

CHAPTER 6:

COMMENT ANALYSIS REPORT



6.0 COMMENT ANALYSIS REPORT

6.1 INTRODUCTION

On September 30, 2005, a Notice of Availability of the Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the Bureau of Land Management (BLM) Ring of Fire planning area was published in the Federal Register (Federal Register 2005), marking the beginning of a 90-day public review period for the document. At the same time, print copies and CDs of the Draft RMP/EIS were made available at public libraries throughout the planning area and by request from the BLM Anchorage Field Office (AFO), and at public hearings held within the planning area. Copies of the document were also distributed to other interested federal and State agencies.

The 90-day public review period was originally scheduled to end on December 29, 2005. A comment period extension was requested as a result of a specific mapping error. BLM produced an errata sheet and new maps, and distributed these to the entire project mailing list. The public comment period was extended by 30 days, and officially ended on January 30, 2006.

In accordance with the National Environmental Policy Act (NEPA), public testimony was recorded at the seven public hearings held in Juneau (Nov. 15, 2005), Skagway (Nov. 16, 2005), Haines (Nov. 17, 2005), Palmer (Dec. 8, 2005), Kodiak (Dec. 12, 2005), Anchorage (Dec. 14, 2005), and Kenai (Dec. 15, 2005). Comments were accepted at any point during the 120-day period and could be submitted via email, United States (U.S.) mail, in person, fax, or through oral testimony at the public hearings. All comments received or post-marked by January 30, 2006 are included in this Comment Analysis Report (CAR).

Section 810 of Alaska National Interest Land Conservation Act (ANILCA) requires an evaluation and findings on whether the proposed Federal land use decisions "may significantly restrict" subsistence uses. If the proposed action may significantly restrict subsistence uses, then notice and special purpose public hearings, referred to as Section 810 hearings or Subsistence Impact hearings, are required. The analysis of potential effects to subsistence uses (Appendix I) concluded that the proposed activities would not significantly restrict subsistence uses. As a result, the Section 810 provisions concerning notice and hearings did not apply, and no separate hearings on subsistence impacts were held. The public was able to review and comment on the information and analysis in the Section 810 Analysis provided in the Draft RMP/EIS (Appendix I) and a number of comments were received. In response to these comments, the language in the Section 810 Analysis for the Proposed RMP/Final EIS was revised to more fully articulate the information base on which analytic conclusions were drawn.

The CAR summarizes the submissions and testimony received during the public review of the Draft RMP/EIS. Most of the testimony and written submittals contained multiple comments about the Draft RMP/EIS. These comments were identified and, where possible, grouped into issue categories (e.g., hazardous materials, fish, visual resources).

Each comment has been assigned a unique identifier so that comments can be referenced back to the originator. Section 6.2 describes the process and methodology used to track and code comments received during the public review period. A brief overview of the number of comments and the general types of comments received on the Draft RMP/EIS is provided in Section 6.3. Attachment A, located at the end of the report, provides an alphabetical list of commenters and their corresponding issue categories that can be used to locate specific comment responses. Attachment D provides an ordered listing of submission numbers and the corresponding commenter, which can also be used to help locate comment responses.

6.2 COMMENT ANALYSIS PROCESS

The analysis of public comments on the Draft RMP/EIS was a multi-stage process that included coding, sorting, and responding to public comment submissions. The process is described in detail below.

6.2.1 Issue Categories

The coded comments in each issue category were reviewed to identify similarities among comments. All similar comments in an issue category were grouped together, assigned an issue code, and a single response that captured the meaning of those comments was prepared. Similar statements were referred back to one comment response where possible. Finally, a global review of the responses was completed to minimize duplication.

6.2.2 Coding

All submissions were assigned a unique identifying number (see Attachment D, Submission Index), and categorized by submission type (email, print copy, or testimony). Each submission was then reviewed to identify all substantive comments within it. Non-substantive and substantive comments are defined in the BLM's Land Use Planning Handbook:

"Non-substantive comments are those that include opinions, assertions, and unsubstantiated claims. Substantive comments are those that reveal new information, missing information, or flawed analysis that would substantially change conclusions" (BLM 2005b: 23-24).

The BLM's National Environmental Policy Act (NEPA) Handbook further clarifies that "comments which express personal preferences or opinions on the proposal do not require a response. They are summarized whenever possible and brought to the attention of the manager responsible for preparing the EIS. Although personal preferences and opinions may influence the final selection of the agency's preferred action, they generally will not affect the analysis" (BLM 1988b: V-12). The planning team also adhered to the Council on Environmental Quality's regulations implementing NEPA at 40 Code of Federal Regulations (CFR) 1503.4 (a) to determine which comments would be included with responses in Attachments B and C of this chapter.

Once identified, each comment was assigned a unique identification number, which was made up of the submission identification and comment number to ensure that each

comment could be readily referenced back to the originator. As seen in the Name Index (Attachment A), each submission can have more than one comment associated with it. Comments were assigned to an issue category (Table 6-1) that reflected the substance of the comment. After all of the submissions were coded, the comment code numbers were transferred into a database along with the name of the commenter, date received, type of submission (i.e. public hearing, email) and any contact information. This allowed comment sorting by various means. Some non-substantive comments were brought to the attention of the BLM during the coding process. These have been included in Attachments B and C, but are responded to as “comment acknowledged.” The substantive comments, and the responses to them, comprise the bulk of this chapter, and can be found in Attachments B and C of this chapter. Comments are included *verbatim*, either as they were submitted in letters or email, or as they were recorded at public hearings.

Many of the comments expressed personal opinions or preferences, had little relevance to the adequacy or accuracy of the Draft RMP/EIS, or represented commentary regarding resource management without any direct connection to the document being reviewed. These comments did not provide specific information to assist in making a change to the proposed action, did not suggest other alternatives, or did not take issue with methods used in the Draft RMP/EIS. They were given in issue code of “ACK” (comment acknowledged), and are not addressed further in this document. Example of non-substantive comments include:

- “I support the SRMA designation for the Haines Block,” and
- “I do not agree with the ‘limited’ OHV designation for all BLM-managed lands.”

Form Letters

There were two different form letters received via email during the comment period. Form letters were analyzed in the same manner as all other comments. Each form letter was analyzed for substantive comments, coded, and entered into the database, and the number of signatures on each form letter, or the instances of each form letter received was recorded. For example, if we received a form letter from 4,000 individuals, the number of submissions was recorded as 4,000 but the comments within the form letter itself are coded once and any substantive comments noted in this appendix. Only one response was prepared for each substantive comment.

In Attachment A, Name Index, if a person submitted a form letter, they will see either “Form Letter #1” or “Form Letter #2” next to their name. To see how the substantive form letter comments were responded to, the person would then go to Attachment B, Form Letter Response Index.

6.3 Public Comment Overview

The public process resulted in 783 submissions received on the Draft RMP/EIS. These 783 submissions were received in the following formats: 732 emails, of which 534 were from Form Letter #1, and 145 were from Form Letter #2; 30 letters; 16 from public hearing testimony; and five from the comment form.

Table 6-1: Issue Codes

Issue Code	Issue
ACC	Access/Travel Management
ACK	Comment Acknowledged
AKN	Alaska Natives
ALT	Alternatives
CEF	Cumulative Effects
CLI	Climate Change
COR	Coordination and Compatibility
CUL	Cultural Resources
DOI	DOI/BLM Compliance
EDI	Edits Requested
EFM	Enforcement and Monitoring
ENJ	Environmental Justice
FIR	Fire and Fuel Management
FSH	Fish
HAZ	Hazardous Materials
LAR	Lands and Realty
LEA	Leasable Minerals
LOC	Locatable and Salable Minerals
MAP	Mapping
NAT	Natural Resources
NEP	NEPA Compliance
OHV	Off-Highway Vehicles
PAL	Paleontological
REC	Recreation
REN	Renewable Energy
ROP	ROPs and Stipulations
SMA	Special Management Areas
SOC	Socioeconomics
SOI	Soils
SUB	Subsistence
TNE	Threatened and Endangered Species
VEG	Vegetation
VIS	Visual Resources
WAT	Water Resources
WET	Wetlands
WIL	Wildlife
WLD	Wilderness
WSR	Wild and Scenic Rivers

The three cities that produced the greatest number of submissions were the Alaskan cities of Haines, Anchorage, and Palmer with 22, 15, and 12, respectively (Figure 6-1). However, the state that produced the greatest number of submissions was California with 108 (Figure 6-2). Upon analysis, as described previously, these 783 submissions produced 922 unique comments.

6.4 ISSUE CATEGORIES

Every substantive comment was assigned to an issue category, which helped group similar comment responses (Table 6-1). Figure 6-3 groups comments by issue, such as Special Management Areas, Visual Resources, and Wildlife. This figure reflects the number of times comments regarding these topics were raised in the submissions.

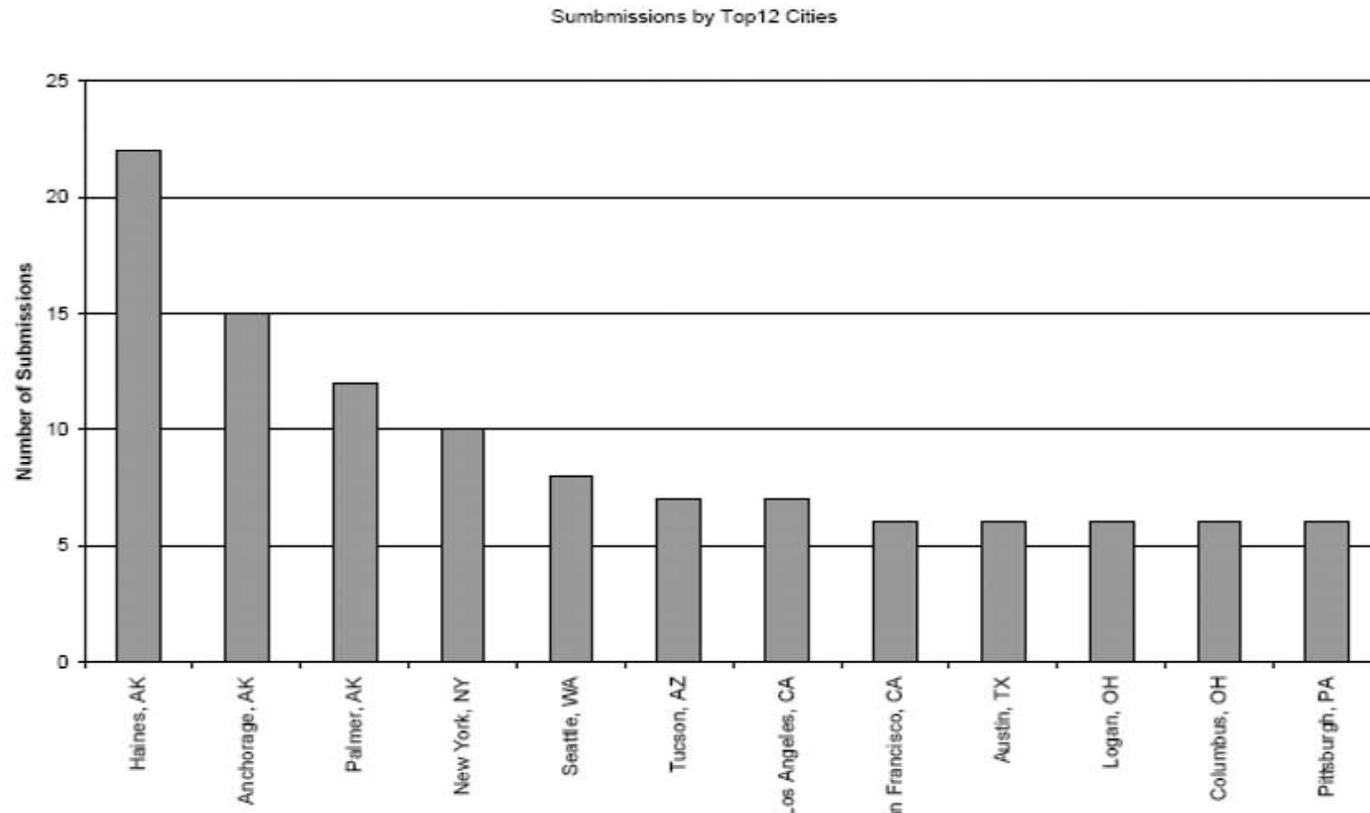


Figure 6-1: Distribution of Submissions by City

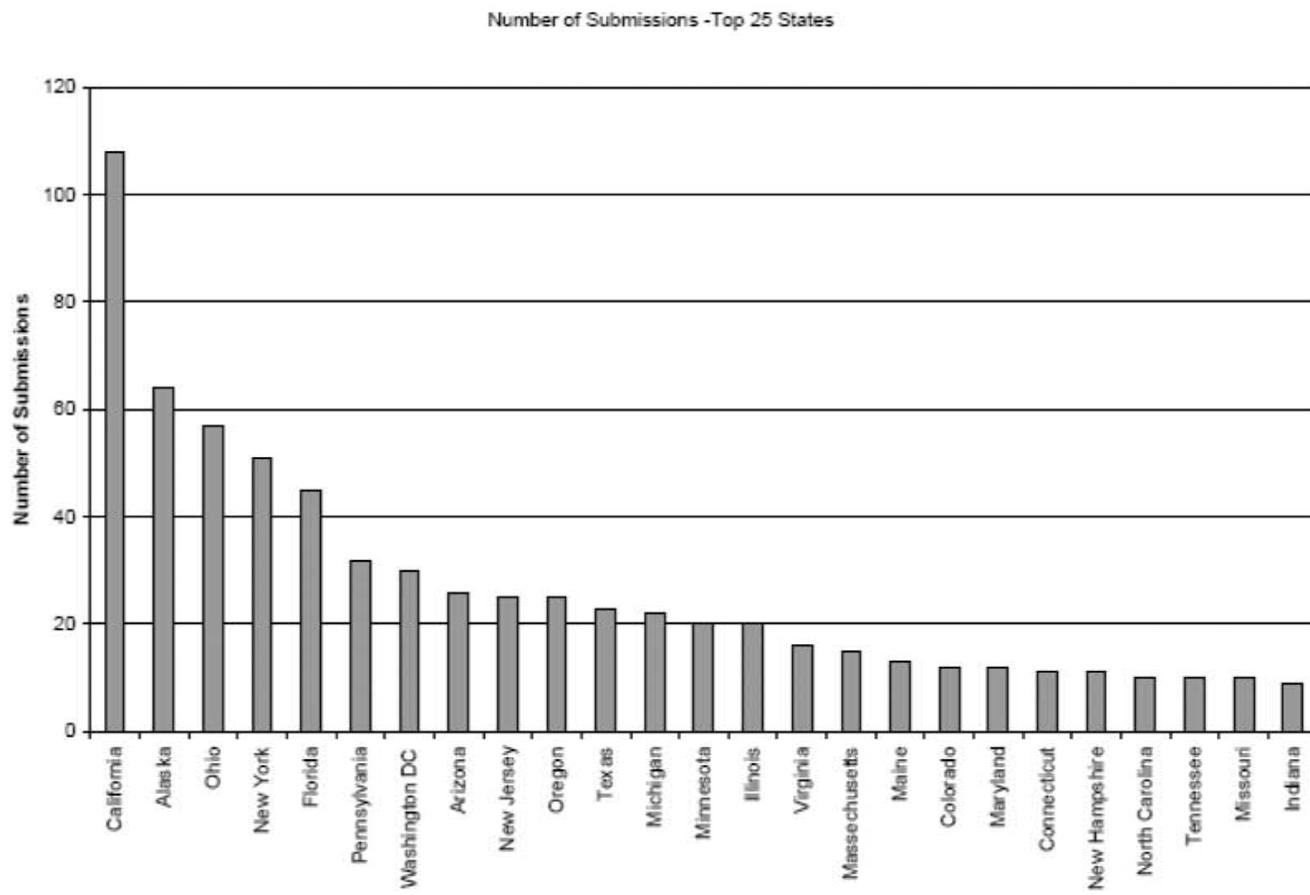


Figure 6-2: Distribution of Submissions by State

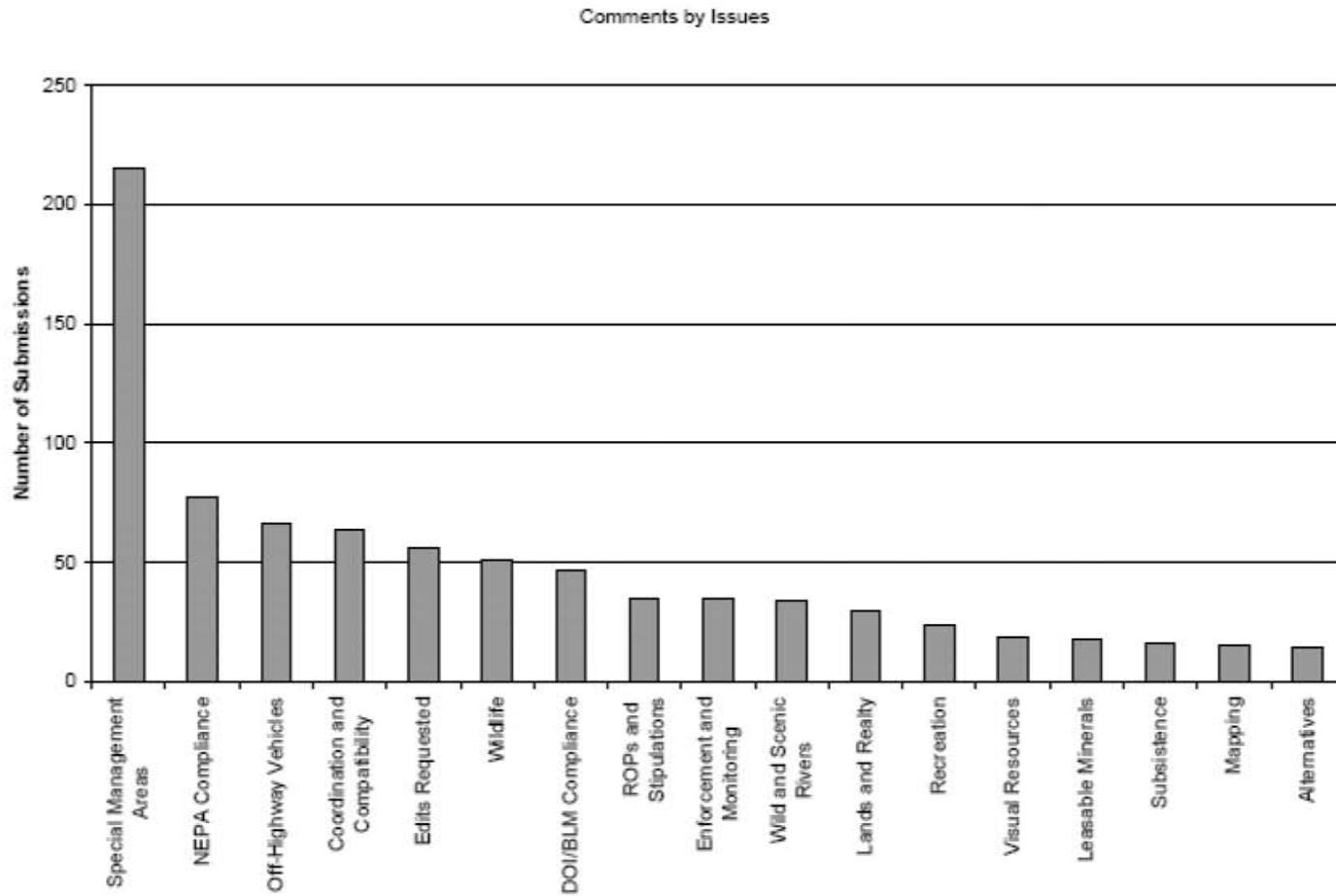


Figure 6-3: Comments Received Grouped by Issue Category

ATTACHMENT A

NAME INDEX

A**Abshire, Kristine A.**

Alaskans for Palmer Hay Flats SGR

Comment#Issue Submitted On

28 - 1	SMA	19 Jan, 2006
28 - 2	LEA	19 Jan, 2006
28 - 3	WIL	19 Jan, 2006
28 - 4	LEA	19 Jan, 2006
28 - 5	SMA	19 Jan, 2006
28 - 6	ACK	19 Jan, 2006
28 - 7	LAR	19 Jan, 2006
28 - 8	NEP	19 Jan, 2006
28 - 9	ACK	19 Jan, 2006
28 - 10	SMA	19 Jan, 2006
28 - 11	ACK	19 Jan, 2006
28 - 12	COR	19 Jan, 2006
28 - 13	ACK	19 Jan, 2006
28 - 14	ACK	19 Jan, 2006
28 - 15	LEA	19 Jan, 2006
28 - 16	LEA	19 Jan, 2006
28 - 17	REC	19 Jan, 2006
28 - 18	SMA	19 Jan, 2006

Adelman, Charlotte

Comment#Issue		Submitted On
F2 - 1	ACK	14 Jan, 2006
F2 - 2	SMA	14 Jan, 2006
F2 - 3	SMA	14 Jan, 2006
F2 - 4	VIS	14 Jan, 2006
F2 - 5	NEP	14 Jan, 2006

Alderson, George

Comment#Issue		Submitted On
19 - 1	ACK	07 Dec, 2005
19 - 2	SMA	07 Dec, 2005
19 - 3	ACK	07 Dec, 2005
19 - 4	OHV	07 Dec, 2005
19 - 5	OHV	07 Dec, 2005
19 - 6	SMA	07 Dec, 2005
19 - 7	SMA	07 Dec, 2005
19 - 8	NEP	07 Dec, 2005

Allred, Frances

Comment#Issue		Submitted On
F1 - 1	ACK	19 Dec, 2005
F1 - 2	SMA	19 Dec, 2005
F1 - 3	ACK	19 Dec, 2005
F1 - 4	SMA	19 Dec, 2005
F1 - 5	ACK	19 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Amato, Gwendoline

Comment#Issue		Submitted On
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006

Acevedo, N. K.

Comment#Issue Submitted On

F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Adams, Kathleen

Comment#Issue Submitted On

F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Amato, Gwendoline

Comment#Issue		Submitted On
F1 - 5	ACK	12 Jan, 2006

Anderson, Corina

Comment#Issue		Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

Anixter, Shelley

Comment#Issue		Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Ashton, Ann

Comment#Issue		Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Ashton, Ann

Comment#Issue		Submitted On
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

B**Babiak, Katherine**

Comment#Issue		Submitted On
F1 - 1	ACK	12 Dec, 2005
F1 - 2	SMA	12 Dec, 2005
F1 - 3	ACK	12 Dec, 2005
F1 - 4	SMA	12 Dec, 2005
F1 - 5	ACK	12 Dec, 2005

Babst, Christina

Comment#Issue		Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Bafik-vehslage, Michelle

Comment#Issue		Submitted On
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006
F1 - 1	ACK	08 Dec, 2005
F1 - 2	SMA	08 Dec, 2005
F1 - 3	ACK	08 Dec, 2005

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Bafik-vehslage, Michelle

Comment#	Issue	Submitted On
F1 - 4	SMA	08 Dec, 2005
F1 - 5	ACK	08 Dec, 2005

Bail, Joseph

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

Baker Mccain, Melanie

Comment#	Issue	Submitted On
F1 - 1	ACK	09 Dec, 2005
F1 - 2	SMA	09 Dec, 2005
F1 - 3	ACK	09 Dec, 2005
F1 - 4	SMA	09 Dec, 2005
F1 - 5	ACK	09 Dec, 2005

Bandy, Paula

Comment#	Issue	Submitted On
F1 - 1	ACK	13 Dec, 2005
F1 - 2	SMA	13 Dec, 2005
F1 - 3	ACK	13 Dec, 2005
F1 - 4	SMA	13 Dec, 2005
F1 - 5	ACK	13 Dec, 2005

Banks, David

The Nature Conservancy		
Comment#	Issue	Submitted On
36 - 1	ACK	30 Jan, 2006
36 - 2	ACK	30 Jan, 2006
36 - 3	SMA	30 Jan, 2006
36 - 4	COR	30 Jan, 2006
36 - 5	LAR	30 Jan, 2006

Banks, David

The Nature Conservancy

Comment#	Issue	Submitted On
36 - 6	ACK	30 Jan, 2006

Barber, Kenny

Comment#	Issue	Submitted On
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25 - 1	ACK	21 Dec, 2005
25 - 2	ACK	21 Dec, 2005
25 - 3	COR	21 Dec, 2005
25 - 4	COR	21 Dec, 2005
25 - 5	OHV	21 Dec, 2005
25 - 6	REC	21 Dec, 2005
25 - 7	LAR	21 Dec, 2005

Barkla, Paul

Comment#	Issue	Submitted On
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F1 - 1	ACK	10 Dec, 2005
F1 - 2	SMA	10 Dec, 2005
F1 - 3	ACK	10 Dec, 2005
F1 - 4	SMA	10 Dec, 2005
F1 - 5	ACK	10 Dec, 2005

Baron, Stewart

Comment#	Issue	Submitted On
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F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005

Barton, Roberta

Comment#	Issue	Submitted On
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F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Bashen, Melinda

Comment#	Issue	Submitted On
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F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Bebber-wells, Rebecca

Comment#	Issue	Submitted On
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F1 - 3	ACK	16 Dec, 2005
F1 - 4	SMA	16 Dec, 2005
F1 - 5	ACK	16 Dec, 2005

Becker, Marilyn

Comment#	Issue	Submitted On
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F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F2 - 1	ACK	13 Jan, 2006
F2 - 2	SMA	13 Jan, 2006
F2 - 3	SMA	13 Jan, 2006
F2 - 4	VIS	13 Jan, 2006
F2 - 5	NEP	13 Jan, 2006

Bell, Ray

Comment#	Issue	Submitted On
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F2 - 1	ACK	25 Jan, 2006
F2 - 2	SMA	25 Jan, 2006
F2 - 3	SMA	25 Jan, 2006
F2 - 4	VIS	25 Jan, 2006
F2 - 5	NEP	25 Jan, 2006
F1 - 1	ACK	13 Dec, 2005
F1 - 2	SMA	13 Dec, 2005
F1 - 3	ACK	13 Dec, 2005
F1 - 4	SMA	13 Dec, 2005
F1 - 5	ACK	13 Dec, 2005

Bellemare, Renee'

Comment#	Issue	Submitted On
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F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005

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Bellemare, Renee'		Berglas, Silvia		Berland, Nancy		Bixler, Simona	
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>
F1 - 5	ACK	14 Dec, 2005	F2 - 2	SMA	17 Jan, 2006	34 - 34	WIL
			F2 - 3	SMA	17 Jan, 2006	34 - 35	REC
Benenati, Scott			F2 - 4	VIS	17 Jan, 2006	34 - 36	NEP
			F2 - 5	NEP	17 Jan, 2006		
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	F1 - 1	ACK	14 Dec, 2005		
F1 - 1	ACK	07 Dec, 2005	F1 - 2	SMA	14 Dec, 2005		
F1 - 2	SMA	07 Dec, 2005	F1 - 3	ACK	14 Dec, 2005		
F1 - 3	ACK	07 Dec, 2005	F1 - 4	SMA	14 Dec, 2005		
F1 - 4	SMA	07 Dec, 2005	F1 - 5	ACK	14 Dec, 2005		
F1 - 5	ACK	07 Dec, 2005					
F2 - 1	ACK	13 Jan, 2006	Berland, Nancy				
F2 - 2	SMA	13 Jan, 2006	Lynn Canal Conservation, Inc.				
F2 - 3	SMA	13 Jan, 2006	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>		
F2 - 4	VIS	13 Jan, 2006	34 - 1	NEP	29 Dec, 2005		
F2 - 5	NEP	13 Jan, 2006	34 - 2	ACK	29 Dec, 2005		
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			34 - 5	SMA	29 Dec, 2005		
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			34 - 7	NEP	29 Dec, 2005		
F1 - 1	ACK	07 Dec, 2005	34 - 8	ACK	29 Dec, 2005		
F1 - 2	SMA	07 Dec, 2005	34 - 9	ACK	29 Dec, 2005		
F1 - 3	ACK	07 Dec, 2005	34 - 10	DOI	29 Dec, 2005		
F1 - 4	SMA	07 Dec, 2005	34 - 11	DOI	29 Dec, 2005		
F1 - 5	ACK	07 Dec, 2005	34 - 12	DOI	29 Dec, 2005		
F2 - 1	ACK	13 Jan, 2006	34 - 13	WIL	29 Dec, 2005		
F2 - 2	SMA	13 Jan, 2006	34 - 14	SMA	29 Dec, 2005		
F2 - 3	SMA	13 Jan, 2006	34 - 15	REC	29 Dec, 2005		
F2 - 4	VIS	13 Jan, 2006	34 - 16	SMA	29 Dec, 2005		
F2 - 5	NEP	13 Jan, 2006	34 - 17	ACK	29 Dec, 2005		
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			34 - 19	ALT	29 Dec, 2005		
			34 - 20	SMA	29 Dec, 2005		
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	34 - 21	ACK	29 Dec, 2005		
			34 - 22	SMA	29 Dec, 2005		
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F1 - 2	SMA	15 Dec, 2005	34 - 24	SMA	29 Dec, 2005		
F1 - 3	ACK	15 Dec, 2005	34 - 25	SMA	29 Dec, 2005		
F1 - 4	SMA	15 Dec, 2005	34 - 26	SMA	29 Dec, 2005		
F1 - 5	ACK	15 Dec, 2005	34 - 27	DOI	29 Dec, 2005		
			34 - 28	SMA	29 Dec, 2005		
			34 - 29	SMA	29 Dec, 2005		
			34 - 30	ALT	29 Dec, 2005		
			34 - 31	ROP	29 Dec, 2005		
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	34 - 32	ROP	29 Dec, 2005		
			34 - 33	ROP	29 Dec, 2005		
F2 - 1	ACK	17 Jan, 2006					
Berglas, Silvia							
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>					
			Berland, Nancy				
			Lynn Canal Conservation, Inc.				
			<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>		
			34 - 34	WIL	29 Dec, 2005		
			34 - 35	REC	29 Dec, 2005		
			34 - 36	NEP	29 Dec, 2005		
Berman, Nancy							
			Bettmann, Joanna				
			<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>		
			34 - 1	NEP	29 Dec, 2005		
			34 - 2	ACK	14 Jan, 2006		
			34 - 3	SMA	14 Jan, 2006		
			34 - 4	VIS	14 Jan, 2006		
			34 - 5	NEP	14 Jan, 2006		
Berg, Samuel							
			Bingham, Carl				
			<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>		
			34 - 1	ACK	07 Dec, 2005		
			34 - 2	SMA	07 Dec, 2005		
			34 - 3	ACK	07 Dec, 2005		
			34 - 4	SMA	07 Dec, 2005		
			34 - 5	ACK	07 Dec, 2005		
			34 - 6	ACK	12 Jan, 2006		
			34 - 7	SMA	12 Jan, 2006		
			34 - 8	ACK	12 Jan, 2006		
			34 - 9	REC	12 Jan, 2006		
			34 - 10	SMA	12 Jan, 2006		
			34 - 11	AKN	12 Jan, 2006		
			34 - 12	LAR	12 Jan, 2006		
			34 - 13	SMA	12 Jan, 2006		
			34 - 14	SMA	12 Jan, 2006		
			34 - 15	NEP	12 Jan, 2006		
			34 - 16	SMA	12 Jan, 2006		
			34 - 17	ACK	12 Jan, 2006		
			34 - 18	WSR	12 Jan, 2006		
Bixler, Simona							
			Bixler, Simona				
			<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>		
			9 - 1	ACK	08 Dec, 2005		
			9 - 2	OHV	08 Dec, 2005		
			Bixler, Simona				
			<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>		
			F1 - 1	ACK	14 Dec, 2005		
			F1 - 2	SMA	14 Dec, 2005		

Ring of Fire Proposed RMP/Final EIS

Blair, Melissa

Alaska Coalition

*Comment#***Issue** *Submitted On*

119 - 28	DOI	30 Jan, 2006
119 - 29	WSR	30 Jan, 2006
119 - 30	DOI	30 Jan, 2006
119 - 31	WSR	30 Jan, 2006
119 - 32	WSR	30 Jan, 2006
119 - 33	CEF	30 Jan, 2006
119 - 34	WSR	30 Jan, 2006
119 - 35	WSR	30 Jan, 2006
119 - 36	SMA	30 Jan, 2006
119 - 37	OHV	30 Jan, 2006
119 - 38	SMA	30 Jan, 2006
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119 - 127	DOI	30 Jan, 2006
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F1 - 1	ACK	12 Jan, 2006	F1 - 1	ACK	12 Jan, 2006		
F1 - 2	SMA	12 Jan, 2006	F1 - 2	SMA	12 Jan, 2006		
F1 - 3	ACK	12 Jan, 2006	F1 - 3	ACK	12 Jan, 2006		
F1 - 4	SMA	12 Jan, 2006	F1 - 4	ACK	12 Jan, 2006		
F1 - 5	ACK	12 Jan, 2006	F1 - 5	ACK	12 Jan, 2006		
Colon, Jannice		Cone, Frances		Cosgriff, Mark		Coviello, Gina	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	09 Dec, 2005	F2 - 1	ACK
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	09 Dec, 2005	F2 - 2	SMA
F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	09 Dec, 2005	F2 - 3	SMA
F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA	09 Dec, 2005	F2 - 4	VIS
F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK	09 Dec, 2005	F2 - 5	NEP
F1 - 1	ACK	12 Jan, 2006	100 - 1	ACK	12 Jan, 2006	F1 - 1	ACK
F1 - 2	SMA	12 Jan, 2006	100 - 2	SMA	12 Jan, 2006	F1 - 2	SMA
F1 - 3	ACK	12 Jan, 2006	100 - 3	SMA	12 Jan, 2006	F1 - 3	ACK
F1 - 4	SMA	12 Jan, 2006	100 - 4	VIS	12 Jan, 2006	F1 - 4	SMA
F1 - 5	ACK	12 Jan, 2006	100 - 5	NEP	12 Jan, 2006	F1 - 5	ACK
			100 - 6	ACK	12 Jan, 2006		
Conn, Craig C.		Conn, Craig C.		Conn, Craig C.		Cox, Vickie	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F1 - 1	ACK	14 Dec, 2005	F2 - 1	ACK	15 Jan, 2006	F1 - 1	ACK
F1 - 2	SMA	14 Dec, 2005	F2 - 2	SMA	15 Jan, 2006	F1 - 2	SMA
F1 - 3	ACK	14 Dec, 2005	F2 - 3	SMA	15 Jan, 2006	F1 - 3	ACK
F1 - 4	SMA	14 Dec, 2005	F2 - 4	VIS	15 Jan, 2006	F1 - 4	SMA
F1 - 5	ACK	14 Dec, 2005	F2 - 5	NEP	15 Jan, 2006	F1 - 5	ACK
F1 - 1	ACK	12 Jan, 2006	F1 - 1	ACK	09 Dec, 2005		
F1 - 2	SMA	12 Jan, 2006	F1 - 2	SMA	09 Dec, 2005		
F1 - 3	ACK	12 Jan, 2006	F1 - 3	ACK	09 Dec, 2005		
F1 - 4	SMA	12 Jan, 2006	F1 - 4	SMA	09 Dec, 2005		
F1 - 5	ACK	12 Jan, 2006	F1 - 5	ACK	09 Dec, 2005		
F1 - 1	ACK	08 Dec, 2005					
F1 - 2	SMA	08 Dec, 2005					

Crane, Steve		Cueny, Colleen		Dadourian, Laurie		Daniel, Shively		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	
72 - 1	LAR		40 - 1	SMA	27 Dec, 2005	F1 - 5	ACK	
72 - 2	REC		40 - 2	WIL	27 Dec, 2005		07 Dec, 2005	
72 - 3	OHV		40 - 3	SMA	27 Dec, 2005			
Cross, Heather		Culbeck, Darsie		Dale, Adrienne		Daniels, J. Scott		
Comment#	Issue	Submitted On	Alaska Mountain Guides	Comment#	Issue	Comment#	Issue	
62 - 1	ACK			62 - 1	ACK	F1 - 1	ACK	
62 - 2	ACK			62 - 2	ACK	F1 - 2	SMA	
62 - 3	ACK			62 - 3	ACK	F1 - 3	ACK	
62 - 4	REC			62 - 4	SMA	F1 - 4	SMA	
Crupi, Lori		Cummings, Terry		Daniel, Shively		Davis, Howard T.		
Haines Borough Assembly		Comment#	Issue	Comment#	Issue	Comment#	Issue	
88 - 1	ACK	28 Dec, 2005	F2 - 1	ACK	13 Jan, 2006	38 - 1	LAR	
88 - 2	SMA	28 Dec, 2005	F2 - 2	SMA	13 Jan, 2006	F1 - 1	ACK	
88 - 3	SMA	28 Dec, 2005	F2 - 3	SMA	13 Jan, 2006	F1 - 2	SMA	
88 - 4	ACK	28 Dec, 2005	F2 - 4	VIS	13 Jan, 2006	F1 - 3	ACK	
88 - 5	WSR	28 Dec, 2005	F2 - 5	NEP	13 Jan, 2006	F1 - 4	SMA	
88 - 6	NEP	28 Dec, 2005	F2 - 1	ACK	13 Jan, 2006	F1 - 5	ACK	
89 - 1	ACK	28 Dec, 2005	F2 - 2	SMA	13 Jan, 2006	F2 - 1	ACK	
89 - 2	SMA	28 Dec, 2005	F2 - 3	SMA	13 Jan, 2006	F2 - 2	SMA	
89 - 3	SMA	28 Dec, 2005	F2 - 4	VIS	13 Jan, 2006	F2 - 3	SMA	
89 - 4	SMA	28 Dec, 2005	F2 - 5	NEP	13 Jan, 2006	F2 - 4	VIS	
89 - 5	SMA	28 Dec, 2005	Curotto, John		Danford, Frank		Defranco, Adam	
89 - 6	ACK	28 Dec, 2005	Comment#	Issue	Comment#	Issue	Comment#	Issue
89 - 7	WSR	28 Dec, 2005	F1 - 1	ACK	12 Dec, 2005	F1 - 1	ACK	07 Dec, 2005
89 - 8	NEP	28 Dec, 2005	F1 - 2	SMA	12 Dec, 2005	F1 - 2	SMA	07 Dec, 2005
90 - 1	ACK	28 Dec, 2005	F1 - 3	ACK	12 Dec, 2005	F1 - 3	ACK	07 Dec, 2005
90 - 2	SMA	28 Dec, 2005	F1 - 4	SMA	12 Dec, 2005	F1 - 4	SMA	07 Dec, 2005
90 - 3	SMA	28 Dec, 2005	F1 - 5	ACK	12 Dec, 2005	F1 - 5	ACK	07 Dec, 2005
90 - 4	WSR	28 Dec, 2005	Curtis, Kevin L.		Daniel, Shively		Name Index	
90 - 5	NEP	28 Dec, 2005	Comment#	Issue	Comment#	Issue	Comment#	Issue
Cueny, Colleen		Comment#	Issue	Comment#	Issue	Comment#	Issue	
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F1 - 1	ACK	13 Dec, 2005	F2 - 2	SMA	14 Jan, 2006	F1 - 2	SMA	
F1 - 2	SMA	13 Dec, 2005	F2 - 3	SMA	14 Jan, 2006	F1 - 3	ACK	
F1 - 3	ACK	13 Dec, 2005	F2 - 4	VIS	14 Jan, 2006	F1 - 4	SMA	
F1 - 4	SMA	13 Dec, 2005	F2 - 5	NEP	14 Jan, 2006	F1 - 5	ACK	
F1 - 5	ACK	13 Dec, 2005	F1 - 1	ACK	07 Dec, 2005			
D			F1 - 2	SMA	07 Dec, 2005			
			F1 - 3	ACK	07 Dec, 2005			
			F1 - 4	SMA	07 Dec, 2005			

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Douglas, Virginia

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Doyle, Patricia

Comment#	Issue	Submitted On
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005
F1 - 3	ACK	15 Dec, 2005
F1 - 4	SMA	15 Dec, 2005
F1 - 5	ACK	15 Dec, 2005

Dubber, Leonard

Comment#	Issue	Submitted On
1 - 1	ACK	17 Nov, 2005
1 - 2	WIL	17 Nov, 2005
1 - 3	ACK	17 Nov, 2005
1 - 4	ACK	17 Nov, 2005
1 - 5	WIL	17 Nov, 2005

Duffy, Abigail

Comment#	Issue	Submitted On
F1 - 1	ACK	23 Dec, 2005
F1 - 2	SMA	23 Dec, 2005
F1 - 3	ACK	23 Dec, 2005
F1 - 4	SMA	23 Dec, 2005
F1 - 5	ACK	23 Dec, 2005

Dugan, Robert G.

Comment#	Issue	Submitted On
93 - 1	SMA	09 Jan, 2006
93 - 2	SMA	09 Jan, 2006
93 - 3	VIS	09 Jan, 2006
93 - 4	NEP	09 Jan, 2006
109 - 1	ACK	23 Jan, 2006
109 - 2	SMA	23 Jan, 2006
109 - 3	VIS	23 Jan, 2006
109 - 4	ACK	23 Jan, 2006
109 - 5	NEP	23 Jan, 2006
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005

Dugan, Robert G.

Comment#	Issue	Submitted On
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Durham, Crystal

Comment#	Issue	Submitted On
F2 - 1	ACK	26 Jan, 2006
F2 - 2	SMA	26 Jan, 2006
F2 - 3	SMA	26 Jan, 2006
F2 - 4	VIS	26 Jan, 2006
F2 - 5	NEP	26 Jan, 2006

E**Eades, Debra**

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Eagle, Nee

Comment#	Issue	Submitted On
F1 - 1	ACK	08 Dec, 2005
F1 - 2	SMA	08 Dec, 2005
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F1 - 4	SMA	08 Dec, 2005
F1 - 5	ACK	08 Dec, 2005
F1 - 1	ACK	08 Dec, 2005
F1 - 2	SMA	08 Dec, 2005
F1 - 3	ACK	08 Dec, 2005
F1 - 4	SMA	08 Dec, 2005
F1 - 5	ACK	08 Dec, 2005

Eiterman, Elisabeth

Comment#	Issue	Submitted On
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005
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F1 - 5	ACK	15 Dec, 2005

Eiterman, Elisabeth

Comment#	Issue	Submitted On

Ekman, Lea

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Ely, Thomas

Comment#	Issue	Submitted On
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005

Enevoldsen, David

Comment#	Issue	Submitted On
F1 - 1	ACK	22 Dec, 2005
F1 - 2	SMA	22 Dec, 2005
F1 - 3	ACK	22 Dec, 2005
F1 - 4	SMA	22 Dec, 2005
F1 - 5	ACK	22 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Engstrom, Neil

Comment#	Issue	Submitted On
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005

Engstrom, Neil		Facette, Jim		Ferguson, Joanne		Figueiredo, Eva		
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F1 - 3	ACK	15 Dec, 2005	F1 - 3	ACK	14 Dec, 2005	F1 - 1	ACK	
F1 - 4	SMA	15 Dec, 2005	F1 - 4	SMA	14 Dec, 2005	F1 - 2	SMA	
F1 - 5	ACK	15 Dec, 2005	F1 - 5	ACK	14 Dec, 2005	F1 - 3	ACK	
Escobar, Annette		Fairfield, John				Fine, Doug		
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F1 - 1	ACK	20 Dec, 2005	F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	
F1 - 2	SMA	20 Dec, 2005	F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	
F1 - 3	ACK	20 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	
F1 - 4	SMA	20 Dec, 2005	F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA	
F1 - 5	ACK	20 Dec, 2005	F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK	
Esra, Nijn		Family, Zmuda				Fitch, James		
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Submitted On</i>	
F1 - 1	ACK	09 Dec, 2005	F1 - 1	ACK	19 Dec, 2005	F1 - 1	ACK	
F1 - 2	SMA	09 Dec, 2005	F1 - 2	SMA	19 Dec, 2005	F1 - 2	SMA	
F1 - 3	ACK	09 Dec, 2005	F1 - 3	ACK	19 Dec, 2005	F1 - 3	ACK	
F1 - 4	SMA	09 Dec, 2005	F1 - 4	SMA	19 Dec, 2005	F1 - 4	SMA	
F1 - 5	ACK	09 Dec, 2005	F1 - 5	ACK	19 Dec, 2005	F1 - 5	ACK	
Evans, Michael W.		Faszczewski, Joan				Flowers, Chris		
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Submitted On</i>	
F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	14 Dec, 2005	F2 - 1	ACK	
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	14 Dec, 2005	F2 - 2	SMA	
F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	14 Dec, 2005	F2 - 3	SMA	
F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA	14 Dec, 2005	F2 - 4	VIS	
F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK	14 Dec, 2005	F2 - 5	NEP	
F2 - 1	ACK	12 Jan, 2006	Fenster, Steven				Ferry, Susan	
F2 - 2	SMA	12 Jan, 2006	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Submitted On</i>	
F2 - 3	SMA	12 Jan, 2006	F1 - 1	ACK	13 Dec, 2005	F2 - 1	ACK	
F2 - 4	VIS	12 Jan, 2006	F1 - 2	SMA	13 Dec, 2005	F2 - 2	SMA	
F2 - 5	NEP	12 Jan, 2006	F1 - 3	ACK	13 Dec, 2005	F2 - 3	SMA	
F		Field, Kimberly				Fogelman, Maxwell		
Facette, Jim		<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Submitted On</i>		
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	F1 - 1	ACK	21 Dec, 2005	F1 - 1	ACK	
F1 - 1	ACK	14 Dec, 2005	F1 - 2	SMA	21 Dec, 2005	F1 - 2	SMA	
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Fogleman, Maxwell

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F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

Fouroux Iii, Henri Andre

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F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005

Fogler, Marah

Comment#	Issue	Submitted On
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F1 - 2	SMA	20 Dec, 2005
F1 - 3	ACK	20 Dec, 2005
F1 - 4	SMA	20 Dec, 2005
F1 - 5	ACK	20 Dec, 2005

Ford, James

Comment#	Issue	Submitted On
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F1 - 2	SMA	14 Dec, 2005
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F1 - 5	ACK	14 Dec, 2005

Foskett, Mary Anna

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F2 - 3	SMA	17 Jan, 2006
F2 - 4	VIS	17 Jan, 2006
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F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005

Fouroux Iii, Henri Andre

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Fries, Carol

Alaska Department of Natural Resources

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33 - 24	ACK	30 Jan, 2006
33 - 25	CLI	30 Jan, 2006
33 - 26	ACK	30 Jan, 2006
33 - 27	EDI	30 Jan, 2006
33 - 28	EDI	30 Jan, 2006
33 - 29	ACK	30 Jan, 2006
33 - 30	EDI	30 Jan, 2006
33 - 31	EDI	30 Jan, 2006
33 - 32	EDI	30 Jan, 2006
33 - 33	EDI	30 Jan, 2006
33 - 34	EDI	30 Jan, 2006
33 - 35	EDI	30 Jan, 2006
33 - 36	MAP	30 Jan, 2006
33 - 37	EDI	30 Jan, 2006
33 - 38	EDI	30 Jan, 2006
33 - 39	EDI	30 Jan, 2006
33 - 40	EDI	30 Jan, 2006
33 - 41	EDI	30 Jan, 2006
33 - 42	ACK	30 Jan, 2006
33 - 43	EDI	30 Jan, 2006
33 - 44	EDI	30 Jan, 2006
33 - 45	OHV	30 Jan, 2006
33 - 46	EDI	30 Jan, 2006
33 - 47	EDI	30 Jan, 2006
33 - 48	EDI	30 Jan, 2006
33 - 49	EDI	30 Jan, 2006
33 - 50	EDI	30 Jan, 2006
33 - 51	EDI	30 Jan, 2006
33 - 52	EDI	30 Jan, 2006
33 - 53	EDI	30 Jan, 2006
33 - 54	EDI	30 Jan, 2006
33 - 55	ACK	30 Jan, 2006
33 - 56	ACK	30 Jan, 2006
33 - 57	MAP	30 Jan, 2006
33 - 58	EDI	30 Jan, 2006
33 - 59	ACK	30 Jan, 2006
33 - 60	ROP	30 Jan, 2006
33 - 61	ROP	30 Jan, 2006
33 - 62	ACK	30 Jan, 2006
33 - 63	MAP	30 Jan, 2006
33 - 64	EDI	30 Jan, 2006
33 - 65	EDI	30 Jan, 2006
33 - 66	ACK	30 Jan, 2006
33 - 67	EDI	30 Jan, 2006
33 - 68	ACK	30 Jan, 2006
33 - 69	NEP	30 Jan, 2006
33 - 70	COR	30 Jan, 2006

Fries, Carol

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Comment#	Issue	Submitted On
33 - 71	ACK	30 Jan, 2006
Fritz, Cecily		
		Knik River Watershed Group
		Comment#
		Submitted On
8 - 1	ACK	08 Dec, 2005
8 - 2	NEP	08 Dec, 2005
8 - 3	SMA	08 Dec, 2005
8 - 4	ACK	08 Dec, 2005
8 - 5	SMA	08 Dec, 2005
47 - 1	ACK	26 Dec, 2005
47 - 2	ACK	26 Dec, 2005
47 - 3	COR	26 Dec, 2005
47 - 4	MAP	26 Dec, 2005
47 - 5	ACK	26 Dec, 2005
47 - 6	NEP	26 Dec, 2005
59 - 1	ACK	03 Nov, 2005

G**Gabrisko, Tracie**

Comment#	Issue	Submitted On
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F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
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F1 - 5	ACK	07 Dec, 2005

Gage, Cathy

Comment#	Issue	Submitted On
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
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F1 - 5	ACK	14 Dec, 2005

Galieti, Ronald J.

Comment#	Issue	Submitted On
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006

Galioti, Ronald J.		Gentile, Ronald		Gibbs-halm, Deborah		Giniewicz, Deborah	
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F2 - 3	SMA	12 Jan, 2006	F1 - 5	ACK	12 Dec, 2005	F1 - 2	SMA
F2 - 4	VIS	12 Jan, 2006				F1 - 3	ACK
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F1 - 1	ACK	07 Dec, 2005				F1 - 5	ACK
F1 - 2	SMA	07 Dec, 2005	Georgiou, Christine		Gintz, Aimee		
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Gannon, Michele							
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F1 - 1	ACK	08 Dec, 2005	Getz, Caroline				
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F1 - 1	ACK	08 Dec, 2005					
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F1 - 1	ACK	08 Dec, 2005					
F1 - 2	SMA	08 Dec, 2005					
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F1 - 5	ACK	08 Dec, 2005					
F1 - 1	ACK	12 Jan, 2006					
F1 - 2	SMA	12 Jan, 2006					
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F1 - 5	ACK	12 Jan, 2006					
Gaydon, Sandra							
Comment##Issue	Submitted On						
F1 - 1	ACK	08 Dec, 2005					
F1 - 2	SMA	08 Dec, 2005					
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Gentile, Ronald							
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F1 - 1	ACK	12 Dec, 2005					
F1 - 2	SMA	12 Dec, 2005					
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Gibbs-halm, Deborah							
Comment##Issue	Submitted On						
F1 - 1	ACK	19 Dec, 2005					
F1 - 2	SMA	19 Dec, 2005					
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F1 - 1	ACK	07 Dec, 2005					
F1 - 2	SMA	07 Dec, 2005					
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F1 - 5	ACK	07 Dec, 2005					
F1 - 1	ACK	12 Jan, 2006					
F1 - 2	SMA	12 Jan, 2006					
F1 - 3	ACK	12 Jan, 2006					
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Giniewicz, Deborah							
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F1 - 1	ACK	12 Jan, 2006					
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F1 - 5	ACK	12 Jan, 2006					
Gintz, Aimee							
Comment##Issue	Submitted On						
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F1 - 5	ACK	08 Dec, 2005					
F1 - 1	ACK	13 Jan, 2006					
F1 - 2	SMA	13 Jan, 2006					
F1 - 3	ACK	13 Jan, 2006					
F1 - 4	VIS	13 Jan, 2006					
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Gols, L.							
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F1 - 1	ACK	07 Dec, 2005					
F1 - 2	SMA	07 Dec, 2005					
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F1 - 3	ACK	12 Jan, 2006					
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F1 - 5	ACK	12 Jan, 2006					
Gille, Greg							
Comment##Issue	Submitted On						
F1 - 1	ACK	07 Dec, 2005					
F1 - 2	SMA	07 Dec, 2005					
F1 - 3	ACK	07 Dec, 2005					
F1 - 4	SMA	07 Dec, 2005					
F1 - 5	ACK	07 Dec, 2005					
61 - 1	ACK	07 Dec, 2005					
61 - 2	SMA	07 Dec, 2005					
61 - 3	ACK	07 Dec, 2005					
61 - 4	SMA	07 Dec, 2005					
61 - 5	ACK	07 Dec, 2005					
104 - 1	ACK	14 Jan, 2006					
104 - 2	SMA	14 Jan, 2006					
104 - 3	SMA	14 Jan, 2006					
104 - 4	VIS	14 Jan, 2006					
104 - 5	NEP	14 Jan, 2006					
Gomez, Maria							
Comment##Issue	Submitted On						
F1 - 1	ACK	20 Dec, 2005					
F1 - 2	SMA	20 Dec, 2005					
F1 - 3	ACK	20 Dec, 2005					
F1 - 4	SMA	20 Dec, 2005					
F1 - 5	ACK	20 Dec, 2005					
Gore, Jesse							
Comment##Issue	Submitted On						

Gore, Jesse			Gray, Carol			Gregory, Branwen			Guthrie, Barbara		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
F1 - 1	ACK	09 Dec, 2005	F1 - 3	ACK	28 Dec, 2005	F1 - 5	ACK	08 Dec, 2005	F2 - 5	NEP	13 Jan, 2006
F1 - 2	SMA	09 Dec, 2005	F1 - 4	SMA	28 Dec, 2005						
F1 - 3	ACK	09 Dec, 2005	F1 - 5	ACK	28 Dec, 2005						
F1 - 4	SMA	09 Dec, 2005									
F1 - 5	ACK	09 Dec, 2005									
Graf, Rosemary			Graziosa, Sara			Griffin, Dorothy			Gutkowski, Marie		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
F1 - 1	ACK	14 Dec, 2005	F1 - 1	SMA	11 Dec, 2005	F1 - 1	ACK	07 Dec, 2005	F1 - 2	SMA	07 Dec, 2005
F1 - 2	SMA	14 Dec, 2005	F1 - 3	ACK	14 Dec, 2005	F1 - 2	ACK	07 Dec, 2005	F1 - 3	ACK	07 Dec, 2005
F1 - 3	ACK	14 Dec, 2005	F1 - 4	SMA	14 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F1 - 4	SMA	07 Dec, 2005
F1 - 4	SMA	14 Dec, 2005	F1 - 5	ACK	14 Dec, 2005	F1 - 4	ACK	07 Dec, 2005	F1 - 5	ACK	07 Dec, 2005
F1 - 5	ACK	14 Dec, 2005	F2 - 1	ACK	12 Jan, 2006	F2 - 1	ACK	12 Jan, 2006	F2 - 2	SMA	12 Jan, 2006
			F2 - 2	SMA	12 Jan, 2006	F2 - 2	SMA	12 Jan, 2006	F2 - 3	SMA	12 Jan, 2006
			F2 - 3	SMA	12 Jan, 2006	F2 - 3	ACK	12 Jan, 2006	F2 - 4	VIS	12 Jan, 2006
			F2 - 4	VIS	12 Jan, 2006	F2 - 4	SMA	12 Jan, 2006	F2 - 5	NEP	12 Jan, 2006
			F2 - 5	NEP	12 Jan, 2006	F2 - 5	ACK	12 Jan, 2006			
Graham, Kimberley			Green, Jason J.			Grover, Ravi			Gutman, Mark		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
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F1 - 2	SMA	10 Dec, 2005	F1 - 2	SMA	12 Dec, 2005	F1 - 2	SMA	12 Dec, 2005	F1 - 2	SMA	12 Dec, 2005
F1 - 3	ACK	10 Dec, 2005	F1 - 3	ACK	12 Dec, 2005	F1 - 3	ACK	12 Dec, 2005	F1 - 3	ACK	12 Dec, 2005
F1 - 4	SMA	10 Dec, 2005	F1 - 4	SMA	12 Dec, 2005	F1 - 4	SMA	12 Dec, 2005	F1 - 4	SMA	12 Dec, 2005
F1 - 5	ACK	10 Dec, 2005	F1 - 5	ACK	12 Dec, 2005	F1 - 5	ACK	12 Dec, 2005	F1 - 5	ACK	12 Dec, 2005
Grasso, Dori			Gregory, Branwen			Grueschow Jr., Kenneth			Hafer, Sarah		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
F2 - 1	ACK	16 Jan, 2006	101 - 1	ACK	12 Jan, 2006	220 -		30 Jan, 2006	F1 - 1	ACK	14 Dec, 2005
F2 - 2	SMA	16 Jan, 2006	101 - 2	SMA	12 Jan, 2006				F1 - 2	SMA	14 Dec, 2005
F2 - 3	SMA	16 Jan, 2006	101 - 3	SMA	12 Jan, 2006				F1 - 3	ACK	14 Dec, 2005
F2 - 4	VIS	16 Jan, 2006	101 - 4	VIS	12 Jan, 2006				F1 - 4	SMA	14 Dec, 2005
F2 - 5	NEP	16 Jan, 2006	101 - 5	NEP	12 Jan, 2006				F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	08 Dec, 2005				F1 - 1	ACK	19 Dec, 2005
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	08 Dec, 2005				F1 - 2	SMA	19 Dec, 2005
F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	08 Dec, 2005				F1 - 3	ACK	19 Dec, 2005
F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA	08 Dec, 2005				F1 - 4	SMA	19 Dec, 2005
F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK	08 Dec, 2005				F1 - 5	ACK	19 Dec, 2005
Gray, Carol			Gregory, Branwen			Guthrie, Barbara			H		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
F1 - 1	ACK	28 Dec, 2005	F1 - 1	ACK	08 Dec, 2005	F2 - 1	ACK	13 Jan, 2006			
F1 - 2	SMA	28 Dec, 2005	F1 - 2	SMA	08 Dec, 2005	F2 - 2	SMA	13 Jan, 2006			
			F1 - 3	ACK	08 Dec, 2005	F2 - 3	SMA	13 Jan, 2006			
			F1 - 4	SMA	08 Dec, 2005	F2 - 4	VIS	13 Jan, 2006			
			F1 - 5	ACK	08 Dec, 2005	F2 - 5	ACK	13 Jan, 2006			

Halligan, Mary		Harlib, Amy		Haugen, Lisa		Hensley, Candi		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	
F2 - 1	ACK	30 Jan, 2006	F2 - 4	VIS	24 Jan, 2006	F1 - 1	ACK	
F2 - 2	SMA	30 Jan, 2006	F2 - 5	NEP	24 Jan, 2006	F1 - 2	SMA	
F2 - 3	SMA	30 Jan, 2006				F1 - 3	ACK	
F2 - 4	VIS	30 Jan, 2006				F1 - 4	SMA	
F2 - 5	NEP	30 Jan, 2006				F1 - 5	ACK	
F1 - 1	ACK	11 Dec, 2005						
F1 - 2	SMA	11 Dec, 2005						
F1 - 3	ACK	11 Dec, 2005						
F1 - 4	SMA	11 Dec, 2005						
F1 - 5	ACK	11 Dec, 2005						
Hand, David		Harrington, Sue		Heasley, Lenora		Herdiska, Robert		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	
F1 - 1	ACK	15 Dec, 2005	F1 - 1	ACK	23 Dec, 2005	F1 - 1	ACK	
F1 - 2	SMA	15 Dec, 2005	F1 - 2	SMA	23 Dec, 2005	F1 - 2	SMA	
F1 - 3	ACK	15 Dec, 2005	F1 - 3	ACK	23 Dec, 2005	F1 - 3	ACK	
F1 - 4	SMA	15 Dec, 2005	F1 - 4	SMA	23 Dec, 2005	F1 - 4	SMA	
F1 - 5	ACK	15 Dec, 2005	F1 - 5	ACK	23 Dec, 2005	F1 - 5	ACK	
Handwerker, Steven		Haskell, Michael		Hedges, Buddy		Hermann, Richard		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	
F1 - 1	ACK	08 Dec, 2005	F1 - 1	ACK	15 Dec, 2005	F1 - 1	ACK	
F1 - 2	SMA	08 Dec, 2005	F1 - 2	SMA	15 Dec, 2005	F1 - 2	SMA	
F1 - 3	ACK	08 Dec, 2005	F1 - 3	ACK	15 Dec, 2005	F1 - 3	ACK	
F1 - 4	SMA	08 Dec, 2005	F1 - 4	SMA	15 Dec, 2005	F1 - 4	SMA	
F1 - 5	ACK	08 Dec, 2005	F1 - 5	ACK	15 Dec, 2005	F1 - 5	ACK	
Hansen, Michael		Hatton, Elizabeth		Heinold, Christian		Herminghaus, Trisha		
Comment#	Issue	Submitted On	Alaska Quiet Rights Coalition				Alaska Quiet Rights Coalition	
F1 - 1	ACK	08 Dec, 2005	Comment#	Issue	Submitted On	Comment#	Issue	
F1 - 2	SMA	08 Dec, 2005	45 - 1	ACK	14 Dec, 2005	F1 - 1	ACK	
F1 - 3	ACK	08 Dec, 2005	45 - 2	SMA	14 Dec, 2005	F1 - 2	SMA	
F1 - 4	SMA	08 Dec, 2005	45 - 3	ACK	14 Dec, 2005	F1 - 3	ACK	
F1 - 5	ACK	08 Dec, 2005	45 - 4	DOI	14 Dec, 2005	F1 - 4	SMA	
			45 - 5	ACK	14 Dec, 2005	F1 - 5	ACK	
			45 - 6	WIL	14 Dec, 2005	F2 - 1	ACK	
			45 - 7	WIL	14 Dec, 2005	F2 - 2	SMA	
			45 - 8	WIL	14 Dec, 2005	F2 - 3	SMA	
46 - 1	ACK	20 Dec, 2005	45 - 9	SMA	14 Dec, 2005	F2 - 4	VIS	
46 - 2	NEP	20 Dec, 2005	45 - 10	NEP	14 Dec, 2005	F2 - 5	NEP	
Harlib, Amy		Haugen, Lisa		Heitman, Carolyn		Hominghaus, Trisha		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	
58 - 1	ACK		F1 - 1	ACK	12 Jan, 2006	Comment#	Issue	
58 - 2	NEP		F1 - 2	SMA	12 Jan, 2006	Submitted On		
F2 - 1	ACK	24 Jan, 2006	F1 - 3	ACK	12 Jan, 2006	17 - 1	ACK	
F2 - 2	SMA	24 Jan, 2006	F1 - 4	SMA	12 Jan, 2006	17 - 2	SMA	
F2 - 3	SMA	24 Jan, 2006	F1 - 5	ACK	12 Jan, 2006	17 - 3	ACK	
						17 - 4	SMA	
						17 - 5	COR	
						17 - 6	ACK	
						17 - 7	SMA	
						17 - 8	COR	
						17 - 9	ACK	
						17 - 10	COR	
						17 - 11	OHV	
						17 - 12	OHV	

Herminghaus, Trisha

Alaska Quiet Rights Coalition

Comment#Issue Submitted On

17 - 13 NEP 11 Nov, 2005

Herndon, Laura

Comment#Issue Submitted On

F1 - 1 ACK 07 Dec, 2005

F1 - 2 SMA 07 Dec, 2005

F1 - 3 ACK 07 Dec, 2005

F1 - 4 SMA 07 Dec, 2005

F1 - 5 ACK 07 Dec, 2005

F1 - 1 ACK 12 Jan, 2006

F1 - 2 SMA 12 Jan, 2006

F1 - 3 ACK 12 Jan, 2006

F1 - 4 SMA 12 Jan, 2006

F1 - 5 ACK 12 Jan, 2006

Hert, Diane

Comment#Issue Submitted On

F1 - 1 ACK 08 Dec, 2005

F1 - 2 SMA 08 Dec, 2005

F1 - 3 ACK 08 Dec, 2005

F1 - 4 SMA 08 Dec, 2005

F1 - 5 ACK 08 Dec, 2005

Hessel, Sue

Comment#Issue Submitted On

F1 - 1 ACK 16 Dec, 2005

F1 - 2 SMA 16 Dec, 2005

F1 - 3 ACK 16 Dec, 2005

F1 - 4 SMA 16 Dec, 2005

F1 - 5 ACK 16 Dec, 2005

Hettinger, Ann

Comment#Issue Submitted On

F1 - 1 ACK 14 Dec, 2005

F1 - 2 SMA 14 Dec, 2005

F1 - 3 ACK 14 Dec, 2005

F1 - 4 SMA 14 Dec, 2005

F1 - 5 ACK 14 Dec, 2005

Heughins, Russ

Idaho Wildlife Federation

Comment#Issue Submitted On

27 - 1 ACK 29 Dec, 2005

27 - 2 NEP 29 Dec, 2005

27 - 3 ACK 29 Dec, 2005

27 - 4 SMA 29 Dec, 2005

27 - 5 ACK 29 Dec, 2005

27 - 6 SMA 29 Dec, 2005

27 - 7 COR 29 Dec, 2005

27 - 8 ACK 29 Dec, 2005

27 - 9 SMA 29 Dec, 2005

27 - 10 NEP 29 Dec, 2005

27 - 11 ACK 29 Dec, 2005

Hill, William Kay

Comment#Issue Submitted On

F1 - 1 ACK 19 Dec, 2005

F1 - 2 SMA 19 Dec, 2005

F1 - 3 ACK 19 Dec, 2005

F1 - 4 SMA 19 Dec, 2005

F1 - 5 ACK 19 Dec, 2005

Hobbs, Melissa

Comment#Issue Submitted On

F1 - 1 ACK 08 Dec, 2005

F1 - 2 SMA 08 Dec, 2005

F1 - 3 ACK 08 Dec, 2005

F1 - 4 SMA 08 Dec, 2005

F1 - 5 ACK 08 Dec, 2005

Hodapp, Natalie

Comment#Issue Submitted On

F2 - 1 ACK 19 Jan, 2006

F2 - 2 SMA 19 Jan, 2006

F2 - 3 SMA 19 Jan, 2006

F2 - 4 VIS 19 Jan, 2006

F2 - 5 NEP 19 Jan, 2006

F1 - 1 ACK 28 Dec, 2005

Hodapp, Natalie

Comment#Issue Submitted On

F1 - 2 SMA 28 Dec, 2005

F1 - 3 ACK 28 Dec, 2005

F1 - 4 SMA 28 Dec, 2005

F1 - 5 ACK 28 Dec, 2005

Holle, Eric

Comment#Issue Submitted On

16 - 1 ACK 17 Nov, 2005

16 - 2 SMA 17 Nov, 2005

16 - 3 ACK 17 Nov, 2005

16 - 4 CEF 17 Nov, 2005

16 - 5 OHV 17 Nov, 2005

16 - 6 ACK 17 Nov, 2005

16 - 7 COR 17 Nov, 2005

16 - 8 ACK 17 Nov, 2005

16 - 9 WSR 17 Nov, 2005

16 - 10 WSR 17 Nov, 2005

16 - 11 REC 17 Nov, 2005

16 - 12 ACK 17 Nov, 2005

16 - 13 LAR 17 Nov, 2005

Horn, Lenora

Comment#Issue Submitted On

F2 - 1 ACK 12 Jan, 2006

F2 - 2 SMA 12 Jan, 2006

F2 - 3 SMA 12 Jan, 2006

F2 - 4 VIS 12 Jan, 2006

F2 - 5 NEP 12 Jan, 2006

Howard, Robert

Comment#Issue Submitted On

22 - 1 ACK 27 Dec, 2005

22 - 2 ACK 27 Dec, 2005

22 - 3 ACK 27 Dec, 2005

22 - 4 ACK 27 Dec, 2005

22 - 5 OHV 27 Dec, 2005

22 - 6 OHV 27 Dec, 2005

22 - 7 OHV 27 Dec, 2005

22 - 8 OHV 27 Dec, 2005

22 - 9 OHV 27 Dec, 2005

22 - 10 ACK 27 Dec, 2005

Howard, Robert

Comment#Issue Submitted On

22 - 11 TNE 27 Dec, 2005

22 - 12 EFM 27 Dec, 2005

22 - 13 REC 27 Dec, 2005

22 - 14 ACK 27 Dec, 2005

22 - 15 ACK 27 Dec, 2005

22 - 16 HAZ 27 Dec, 2005

22 - 17 HAZ 27 Dec, 2005

22 - 18 NAT 27 Dec, 2005

22 - 19 NAT 27 Dec, 2005

22 - 20 COR 27 Dec, 2005

22 - 21 COR 27 Dec, 2005

22 - 22 ACK 27 Dec, 2005

22 - 23 ACK 27 Dec, 2005

Huber, Alycia

Comment#Issue Submitted On

F1 - 1 ACK 19 Dec, 2005

F1 - 2 SMA 19 Dec, 2005

F1 - 3 ACK 19 Dec, 2005

F1 - 4 SMA 19 Dec, 2005

F1 - 5 ACK 19 Dec, 2005

Huggins, William

Comment#Issue Submitted On

F1 - 1 ACK 09 Dec, 2005

F1 - 2 SMA 09 Dec, 2005

F1 - 3 ACK 09 Dec, 2005

F1 - 4 SMA 09 Dec, 2005

F1 - 5 ACK 09 Dec, 2005

F2 - 1 ACK 13 Jan, 2006

F2 - 2 SMA 13 Jan, 2006

F2 - 3 SMA 13 Jan, 2006

F2 - 4 VIS 13 Jan, 2006

F2 - 5 NEP 13 Jan, 2006

Hughes, Judy

Comment#Issue Submitted On

F1 - 1 ACK 07 Dec, 2005

F1 - 2 SMA 07 Dec, 2005

F1 - 3 ACK 07 Dec, 2005

F1 - 4 SMA 07 Dec, 2005

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Hughes, Judy

Comment#	Issue	Submitted On
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F2 - 1	ACK	13 Jan, 2006
F2 - 2	SMA	13 Jan, 2006
F2 - 3	SMA	13 Jan, 2006
F2 - 4	VIS	13 Jan, 2006
F2 - 5	NEP	13 Jan, 2006

Hutchinson, Dr. Terrance A

Comment#	Issue	Submitted On
F1 - 1	ACK	12 Dec, 2005
F1 - 2	SMA	12 Dec, 2005
F1 - 3	ACK	12 Dec, 2005
F1 - 4	SMA	12 Dec, 2005
F1 - 5	ACK	12 Dec, 2005

Hydinger, Carol

Comment#	Issue	Submitted On
F1 - 3	ACK	16 Dec, 2005
F1 - 4	SMA	16 Dec, 2005
F1 - 5	ACK	16 Dec, 2005

Jaslow, Douglas

Comment#	Issue	Submitted On
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

Hyland, Anne

Hutchison, Phyllis

Comment#	Issue	Submitted On
F1 - 1	ACK	10 Dec, 2005
F1 - 2	SMA	10 Dec, 2005
F1 - 3	ACK	10 Dec, 2005
F1 - 4	SMA	10 Dec, 2005
F1 - 5	ACK	10 Dec, 2005

Hunrichs, Paul

Comment#	Issue	Submitted On
F2 - 1	ACK	15 Jan, 2006
F2 - 2	SMA	15 Jan, 2006
F2 - 3	SMA	15 Jan, 2006
F2 - 4	VIS	15 Jan, 2006
F2 - 5	NEP	15 Jan, 2006
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Hunt, Otto J.

Comment#	Issue	Submitted On
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	15 Jan, 2006
F1 - 2	SMA	15 Jan, 2006
F1 - 3	ACK	15 Jan, 2006
F1 - 4	VIS	15 Jan, 2006
F1 - 5	NEP	15 Jan, 2006
F1 - 1	ACK	23 Dec, 2005
F1 - 2	SMA	23 Dec, 2005
F1 - 3	ACK	23 Dec, 2005
F1 - 4	SMA	23 Dec, 2005
F1 - 5	ACK	23 Dec, 2005

Hyatt, Donald

Comment#	Issue	Submitted On
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	20 Dec, 2005
F1 - 2	SMA	20 Dec, 2005
F1 - 3	ACK	20 Dec, 2005
F1 - 4	SMA	20 Dec, 2005
F1 - 5	ACK	20 Dec, 2005

Hydinger, Carol

Comment#	Issue	Submitted On
F1 - 1	ACK	16 Dec, 2005
F1 - 2	SMA	16 Dec, 2005

Hydinger, Carol

Comment#	Issue	Submitted On
F1 - 3	ACK	16 Dec, 2005
F1 - 4	SMA	16 Dec, 2005
F1 - 5	ACK	16 Dec, 2005

Jaslow, Douglas

Comment#	Issue	Submitted On
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

Jerden, Beverly

Comment#	Issue	Submitted On
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005
F1 - 3	ACK	15 Dec, 2005
F1 - 4	SMA	15 Dec, 2005
F1 - 5	ACK	15 Dec, 2005

J

Jacobsen, Paul

Comment#	Issue	Submitted On
F1 - 1	ACK	19 Dec, 2005
F1 - 2	SMA	19 Dec, 2005
F1 - 3	ACK	19 Dec, 2005
F1 - 4	SMA	19 Dec, 2005
F1 - 5	ACK	19 Dec, 2005

Jobe, Susan

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F2 - 1	ACK	16 Jan, 2006
F2 - 2	SMA	16 Jan, 2006
F2 - 3	SMA	16 Jan, 2006
F2 - 4	VIS	16 Jan, 2006
F2 - 5	NEP	16 Jan, 2006

Johnson, Curtis

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	26 Dec, 2005
F1 - 2	SMA	26 Dec, 2005
F1 - 3	ACK	26 Dec, 2005
F1 - 4	SMA	26 Dec, 2005
F1 - 5	ACK	26 Dec, 2005
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005

Ring of Fire Proposed RMP/Final EIS

Johnson, Curtis

Comment#	Issue	Submitted On
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
Jonas, Mark		
Comment#	Issue	Submitted On
106 - 1	ACK	17 Jan, 2006
106 - 2	SMA	17 Jan, 2006
106 - 3	SMA	17 Jan, 2006
106 - 4	VIS	17 Jan, 2006
106 - 5	NEP	17 Jan, 2006

Jones, Sev

Matanuska-Susitna Borough		
Comment#	Issue	Submitted On
24 - 1	NEP	19 Dec, 2005
24 - 2	ACK	19 Dec, 2005
24 - 3	ACK	19 Dec, 2005
24 - 4	COR	19 Dec, 2005
24 - 5	LEA	19 Dec, 2005
24 - 6	COR	19 Dec, 2005
24 - 7	COR	19 Dec, 2005
24 - 8	COR	19 Dec, 2005
24 - 9	COR	19 Dec, 2005
24 - 10	COR	19 Dec, 2005
24 - 11	ACK	19 Dec, 2005
24 - 12	COR	19 Dec, 2005
24 - 13	ACC	19 Dec, 2005
24 - 14	NEP	19 Dec, 2005
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	20 Dec, 2005
F1 - 2	SMA	20 Dec, 2005
F1 - 3	ACK	20 Dec, 2005
F1 - 4	SMA	20 Dec, 2005
F1 - 5	ACK	20 Dec, 2005
F1 - 1	ACK	22 Dec, 2005
F1 - 2	SMA	22 Dec, 2005
F1 - 3	ACK	22 Dec, 2005
F1 - 4	SMA	22 Dec, 2005
F1 - 5	ACK	22 Dec, 2005
F1 - 1	ACK	12 Jan, 2006

Jones, Sev

Matanuska-Susitna Borough

Comment#	Issue	Submitted On
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006
F2 - 1	ACK	13 Jan, 2006
F2 - 2	SMA	13 Jan, 2006
F2 - 3	SMA	13 Jan, 2006
F2 - 4	VIS	13 Jan, 2006
F2 - 5	NEP	13 Jan, 2006

Jud, Daniel

Comment#	Issue	Submitted On
F1 - 4	SMA	09 Dec, 2005
F1 - 5	ACK	09 Dec, 2005
F2 - 1	ACK	13 Jan, 2006
F2 - 2	SMA	13 Jan, 2006
F2 - 3	SMA	13 Jan, 2006
F2 - 4	VIS	13 Jan, 2006
F2 - 5	NEP	13 Jan, 2006

Justice, Stan

Comment#	Issue	Submitted On
69 - 1	SMA	15 Dec, 2005
69 - 2	ACK	15 Dec, 2005

K

Kautz, Katherine

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Keefer, Nina

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Jud, Daniel

Comment#	Issue	Submitted On
F1 - 1	ACK	09 Dec, 2005
F1 - 2	SMA	09 Dec, 2005

Comment#	Issue	Submitted On
F1 - 1	ACK	12 Dec, 2005

Kelly, Wayne

Comment#	Issue	Submitted On
F1 - 2	SMA	12 Dec, 2005
F1 - 3	ACK	12 Dec, 2005
F1 - 4	SMA	12 Dec, 2005
F1 - 5	ACK	12 Dec, 2005
F2 - 1	ACK	14 Jan, 2006
F2 - 2	SMA	14 Jan, 2006
F2 - 3	SMA	14 Jan, 2006
F2 - 4	VIS	14 Jan, 2006
F2 - 5	NEP	14 Jan, 2006

Kennedy, Bill

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Kirby, Alison

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Kirschling, Karen

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Klein, E.

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 3	ACK	10 Dec, 2005
F1 - 4	SMA	10 Dec, 2005
F1 - 5	ACK	10 Dec, 2005

Kosar, Mary Lou

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005

Kuny, Megaera

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	20 Dec, 2005
F1 - 2	SMA	20 Dec, 2005
F1 - 3	ACK	20 Dec, 2005
F1 - 4	SMA	20 Dec, 2005
F1 - 5	ACK	20 Dec, 2005

Kittleson, Marcia

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

Knox, Janet

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	20 Dec, 2005
F1 - 2	SMA	20 Dec, 2005
F1 - 3	ACK	20 Dec, 2005
F1 - 4	SMA	20 Dec, 2005
F1 - 5	ACK	20 Dec, 2005

Kosek, Kateri

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	09 Jan, 2006
F1 - 2	SMA	09 Jan, 2006
F1 - 3	ACK	09 Jan, 2006
F1 - 4	SMA	09 Jan, 2006
F1 - 5	ACK	09 Jan, 2006

Kurland, Miriam Beth

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005
F1 - 3	ACK	15 Dec, 2005
F1 - 4	SMA	15 Dec, 2005
F1 - 5	ACK	15 Dec, 2005

L**Lambrecht, Gretchen**

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006
F1 - 1	ACK	08 Dec, 2005
F1 - 2	SMA	08 Dec, 2005
F1 - 3	ACK	08 Dec, 2005
F1 - 4	SMA	08 Dec, 2005
F1 - 5	ACK	08 Dec, 2005

Kolehmainen, Karol

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
56 - 1	ACK	30 Jan, 2006

Kopp, Helen

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F2 - 1	ACK	24 Jan, 2006
F2 - 2	SMA	24 Jan, 2006
F2 - 3	SMA	24 Jan, 2006
F2 - 4	VIS	24 Jan, 2006
F2 - 5	NEP	24 Jan, 2006

Kosar, Mary Lou

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005

Kulcsar, Michael

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005
F1 - 3	ACK	15 Dec, 2005
F1 - 4	SMA	15 Dec, 2005
F1 - 5	ACK	15 Dec, 2005

Kuny, Megaera

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F2 - 1	ACK	15 Jan, 2006
F2 - 2	SMA	15 Jan, 2006
F2 - 3	SMA	15 Jan, 2006
F2 - 4	VIS	15 Jan, 2006
F2 - 5	NEP	15 Jan, 2006

Klein, E.

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	10 Dec, 2005
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Lancaster, Emily		Lavoie, Monique		Ledgerwood, Lynn		Levy, Andrea	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
			F1 - 1	ACK	07 Dec, 2005	F1 - 2	SMA
Lareau, Audrey			F1 - 2	SMA	07 Dec, 2005	F1 - 3	ACK
Comment#	Issue	Submitted On	F1 - 3	ACK	07 Dec, 2005	F1 - 4	SMA
F2 - 1	ACK	14 Jan, 2006	F1 - 4	SMA	07 Dec, 2005	F1 - 5	ACK
F2 - 2	SMA	14 Jan, 2006	F1 - 5	ACK	07 Dec, 2005		
F2 - 3	SMA	14 Jan, 2006					
F2 - 4	VIS	14 Jan, 2006					
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F1 - 1	ACK	07 Dec, 2005					
F1 - 2	SMA	07 Dec, 2005					
F1 - 3	ACK	07 Dec, 2005					
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F1 - 5	ACK	07 Dec, 2005					
Larson, June							
Pug Lovers Rescue							
Comment#	Issue	Submitted On					
F2 - 1	ACK	15 Jan, 2006					
F2 - 2	SMA	15 Jan, 2006					
F2 - 3	SMA	15 Jan, 2006					
F2 - 4	VIS	15 Jan, 2006					
F2 - 5	NEP	15 Jan, 2006					
Laschiava, Dona							
Comment#	Issue	Submitted On					
F1 - 1	ACK	11 Dec, 2005					
F1 - 2	SMA	11 Dec, 2005					
F1 - 3	ACK	11 Dec, 2005					
F1 - 4	SMA	11 Dec, 2005					
F1 - 5	ACK	11 Dec, 2005					
Latta, Natasha							
Comment#	Issue	Submitted On					
F1 - 1	ACK	08 Dec, 2005					
F1 - 2	SMA	08 Dec, 2005					
F1 - 3	ACK	08 Dec, 2005					
F1 - 4	SMA	08 Dec, 2005					
F1 - 5	ACK	08 Dec, 2005					
115 - 1	NEP	19 Dec, 2005					
115 - 2	SMA	19 Dec, 2005					
115 - 3	ACK	19 Dec, 2005					
115 - 4	NEP	19 Dec, 2005					
Leeson, Mark							
Leach, Tim							
Comment#	Issue	Submitted On					
F2 - 1	ACK	17 Jan, 2006					
F2 - 2	SMA	17 Jan, 2006					
F2 - 3	SMA	17 Jan, 2006					
F2 - 4	VIS	17 Jan, 2006					
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F1 - 1	ACK	17 Jan, 2006					
F1 - 2	SMA	17 Jan, 2006					
F1 - 3	SMA	17 Jan, 2006					
F1 - 4	VIS	17 Jan, 2006					
F1 - 5	NEP	17 Jan, 2006					
F1 - 6	ACK	17 Jan, 2006					
Ledden, Dennis							
Comment#	Issue	Submitted On					
F1 - 1	ACK	07 Dec, 2005					
F1 - 2	SMA	07 Dec, 2005					
F1 - 3	ACK	07 Dec, 2005					
F1 - 4	SMA	07 Dec, 2005					
F1 - 5	ACK	07 Dec, 2005					
F2 - 1	ACK	13 Jan, 2006					
F2 - 2	SMA	13 Jan, 2006					
F2 - 3	SMA	13 Jan, 2006					
F2 - 4	VIS	13 Jan, 2006					
F2 - 5	NEP	13 Jan, 2006					
Lemke, Melissa							
Comment#	Issue	Submitted On					
F1 - 1	ACK	07 Dec, 2005					
F1 - 2	SMA	07 Dec, 2005					
F1 - 3	ACK	07 Dec, 2005					
F1 - 4	SMA	07 Dec, 2005					
F1 - 5	ACK	07 Dec, 2005					
Libenson, Sue							
Alaska Coalition							
Comment#	Issue	Submitted On					
81 - 1	ACK	28 Dec, 2005					
81 - 2	SMA	28 Dec, 2005					
81 - 3	ACK	28 Dec, 2005					
81 - 4	SMA	28 Dec, 2005					
Lien, David							
Comment#	Issue	Submitted On					
F1 - 1	ACK	07 Dec, 2005					
F1 - 2	SMA	07 Dec, 2005					
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F1 - 5	ACK	07 Dec, 2005					
F1 - 1	ACK	23 Dec, 2005					
F1 - 2	SMA	23 Dec, 2005					
F1 - 3	ACK	23 Dec, 2005					
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F1 - 5	ACK	23 Dec, 2005					
Leonard, Richard							
Comment#	Issue	Submitted On					
F1 - 1	ACK	07 Dec, 2005					
F1 - 2	SMA	07 Dec, 2005					
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F1 - 4	SMA	07 Dec, 2005					
F1 - 5	ACK	07 Dec, 2005					
F2 - 1	ACK	12 Jan, 2006					
F2 - 2	SMA	12 Jan, 2006					
F2 - 3	ACK	12 Jan, 2006					
F2 - 4	SMA	12 Jan, 2006					
F2 - 5	ACK	12 Jan, 2006					

Lopez, Carmen

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005
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F1 - 4	SMA	15 Dec, 2005
F1 - 5	ACK	15 Dec, 2005

Lynch, Gail

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F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005

Maddox, Charles

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 4	SMA	12 Jan, 2006
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Marchese, John

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	07 Dec, 2005
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F1 - 5	ACK	07 Dec, 2005

Loria, Steven

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

Lytle, Denise

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	11 Dec, 2005
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F1 - 3	ACK	11 Dec, 2005
F1 - 4	SMA	11 Dec, 2005
F1 - 5	ACK	11 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Luke, Keth**M****M., Lexi**

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
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Lushear, Carol

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
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F1 - 5	ACK	07 Dec, 2005

Maddox, Charles

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	09 Dec, 2005
F1 - 2	SMA	09 Dec, 2005
F1 - 3	ACK	09 Dec, 2005
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F1 - 5	ACK	09 Dec, 2005

Lynch, Gail

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
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F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006

Marchese, John

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	15 Dec, 2005
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Marks, Linda

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

Martin, Donna

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	19 Dec, 2005
F1 - 2	SMA	19 Dec, 2005
F1 - 3	ACK	19 Dec, 2005
F1 - 4	SMA	19 Dec, 2005
F1 - 5	ACK	19 Dec, 2005
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
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Martin-brodak, Diane

<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005

Martin-brodak, Diane		Mastri, Frank		Mccoy, Cherie		Mcguire, Sally	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F1 - 3	ACK	15 Dec, 2005	F1 - 5	ACK	07 Dec, 2005	F1 - 1	ACK
F1 - 4	SMA	15 Dec, 2005	F1 - 1	ACK	14 Dec, 2005	F1 - 2	SMA
F1 - 5	ACK	15 Dec, 2005	F1 - 2	SMA	14 Dec, 2005	F1 - 3	ACK
F2 - 1	ACK	13 Jan, 2006	F1 - 3	ACK	14 Dec, 2005	F1 - 4	SMA
F2 - 2	SMA	13 Jan, 2006	F1 - 4	SMA	14 Dec, 2005	F1 - 5	ACK
F2 - 3	SMA	13 Jan, 2006	F1 - 5	ACK	14 Dec, 2005		
F2 - 4	VIS	13 Jan, 2006					
F2 - 5	NEP	13 Jan, 2006					
Martinez, Doreen E.							
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F1 - 1	ACK	14 Dec, 2005	F1 - 1	ACK	17 Dec, 2005	F1 - 1	ACK
F1 - 2	SMA	14 Dec, 2005	F1 - 2	SMA	17 Dec, 2005	F1 - 2	WIL
F1 - 3	ACK	14 Dec, 2005	F1 - 3	ACK	17 Dec, 2005	F1 - 3	SMA
F1 - 4	SMA	14 Dec, 2005	F1 - 4	SMA	17 Dec, 2005	F1 - 4	WIL
F1 - 5	ACK	14 Dec, 2005	F1 - 5	ACK	17 Dec, 2005	F1 - 5	REC
Mayo, Michael John							
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F1 - 1	ACK	20 Dec, 2005	F1 - 1	ACK	20 Dec, 2005	F1 - 1	WIL
F1 - 2	WIL	20 Dec, 2005	F1 - 2	SMA	20 Dec, 2005	F1 - 2	ACK
F1 - 3	SMA	20 Dec, 2005	F1 - 3	ACK	20 Dec, 2005	F1 - 3	SOC
F1 - 4	WIL	20 Dec, 2005	F1 - 4	WIL	20 Dec, 2005	F1 - 4	FSH
F1 - 5	REC	20 Dec, 2005	F1 - 5	REC	20 Dec, 2005	F1 - 5	WIL
Mcdonough, Tim							
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F1 - 1	ACK	15 Dec, 2005	F1 - 1	ACK	15 Dec, 2005	F1 - 1	ACK
F1 - 2	WIL	15 Dec, 2005	F1 - 2	SMA	15 Dec, 2005	F1 - 2	ACK
F1 - 3	SMA	15 Dec, 2005	F1 - 3	ACK	15 Dec, 2005	F1 - 3	SOC
F1 - 4	WIL	15 Dec, 2005	F1 - 4	WIL	15 Dec, 2005	F1 - 4	FSH
F1 - 5	REC	15 Dec, 2005	F1 - 5	REC	15 Dec, 2005	F1 - 5	WIL
Mcginness, Doris							
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F2 - 1	ACK	12 Jan, 2006	F2 - 1	ACK	12 Jan, 2006	F2 - 1	LAR
F2 - 2	SMA	12 Jan, 2006	F2 - 2	SMA	12 Jan, 2006	F2 - 2	REN
F2 - 3	SMA	12 Jan, 2006	F2 - 3	SMA	12 Jan, 2006	F2 - 3	ACK
F2 - 4	VIS	12 Jan, 2006	F2 - 4	VIS	12 Jan, 2006	F2 - 4	22 Dec, 2005
F2 - 5	NEP	12 Jan, 2006	F2 - 5	NEP	12 Jan, 2006	F2 - 5	SMA
F1 - 1	ACK	08 Dec, 2005	F1 - 1	ACK	08 Dec, 2005	F1 - 1	22 Dec, 2005
F1 - 2	SMA	08 Dec, 2005	F1 - 2	SMA	08 Dec, 2005	F1 - 2	WSR
F1 - 3	ACK	08 Dec, 2005	F1 - 3	ACK	08 Dec, 2005	F1 - 3	ACK
F1 - 4	SMA	08 Dec, 2005	F1 - 4	SMA	08 Dec, 2005	F1 - 4	ACK
F1 - 5	ACK	08 Dec, 2005	F1 - 5	ACK	08 Dec, 2005	F1 - 5	22 Dec, 2005
Mckew, Quinn							
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Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
113 - 1	NEP	30 Jan, 2006	113 - 1	NEP	30 Jan, 2006	113 - 1	ACK
113 - 2	ACK	30 Jan, 2006	113 - 2	ACK	30 Jan, 2006	113 - 2	WSR
113 - 3	WSR	30 Jan, 2006	113 - 3	WSR	30 Jan, 2006	113 - 3	ACK
113 - 4	ACK	30 Jan, 2006	113 - 4	ACK	30 Jan, 2006	113 - 4	WSR
113 - 5	WSR	30 Jan, 2006	113 - 5	WSR	30 Jan, 2006	113 - 5	ACK
113 - 6	WSR	30 Jan, 2006	113 - 6	WSR	30 Jan, 2006	113 - 6	WSR
113 - 7	WSR	30 Jan, 2006	113 - 7	WSR	30 Jan, 2006	113 - 7	ACK
113 - 8	WSR	30 Jan, 2006	113 - 8	WSR	30 Jan, 2006	113 - 8	WSR
113 - 9	WSR	30 Jan, 2006	113 - 9	WSR	30 Jan, 2006	113 - 9	ACK
113 - 10	WSR	30 Jan, 2006	113 - 10	WSR	30 Jan, 2006	113 - 10	WSR
113 - 11	WSR	30 Jan, 2006	113 - 11	WSR	30 Jan, 2006	113 - 11	ACK
113 - 12	SMA	30 Jan, 2006	113 - 12	SMA	30 Jan, 2006	113 - 12	SMA
113 - 13	SMA	30 Jan, 2006	113 - 13	SMA	30 Jan, 2006	113 - 13	SMA
113 - 14	SMA	30 Jan, 2006	113 - 14	SMA	30 Jan, 2006	113 - 14	SMA
113 - 15	SMA	30 Jan, 2006	113 - 15	SMA	30 Jan, 2006	113 - 15	SMA
113 - 16	SMA	30 Jan, 2006	113 - 16	SMA	30 Jan, 2006	113 - 16	SMA
113 - 17	ACK	30 Jan, 2006	113 - 17	ACK	30 Jan, 2006	113 - 17	ACK
Mastenbrook, Marianne							
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	13 Jan, 2006	F1 - 1	ACK
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	13 Jan, 2006	F1 - 2	SMA
F1 - 3	ACK	07 Dec, 2005	F1 - 3	NEP	13 Jan, 2006	F1 - 3	NEP
F1 - 4	SMA	07 Dec, 2005	F1 - 4	ACK	13 Jan, 2006	F1 - 4	ACK
F1 - 5	ACK	07 Dec, 2005	F1 - 5	SMA	13 Jan, 2006	F1 - 5	SMA
McCleary, Harriet							
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F2 - 1	ACK	13 Jan, 2006	F2 - 1	ACK	12 Jan, 2006	F2 - 1	ACK
F2 - 2	SMA	13 Jan, 2006	F2 - 2	SMA	12 Jan, 2006	F2 - 2	REN
F2 - 3	SMA	13 Jan, 2006	F2 - 3	SMA	12 Jan, 2006	F2 - 3	ACK
F2 - 4	VIS	13 Jan, 2006	F2 - 4	VIS	12 Jan, 2006	F2 - 4	22 Dec, 2005
F2 - 5	NEP	13 Jan, 2006	F2 - 5	NEP	12 Jan, 2006	F2 - 5	SMA
F1 - 1	ACK	08 Dec, 2005	F1 - 1	ACK	08 Dec, 2005	F1 - 1	22 Dec, 2005
F1 - 2	SMA	08 Dec, 2005	F1 - 2	SMA	08 Dec, 2005	F1 - 2	WSR
F1 - 3	ACK	08 Dec, 2005	F1 - 3	ACK	08 Dec, 2005	F1 - 3	ACK
F1 - 4	SMA	08 Dec, 2005	F1 - 4	SMA	08 Dec, 2005	F1 - 4	ACK
F1 - 5	ACK	08 Dec, 2005	F1 - 5	ACK	08 Dec, 2005	F1 - 5	ACK
Mcclintock, Cathy							
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA
F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK
F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA
F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK
Mastri, Frank							
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F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	12 Jan, 2006	F1 - 1	ACK
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	12 Jan, 2006	F1 - 2	ACK
F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	12 Jan, 2006	F1 - 3	ACK
F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA	12 Jan, 2006	F1 - 4	SMA
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113 - 19	ACK	30 Jan, 2006
113 - 20	WSR	30 Jan, 2006
113 - 21	WSR	30 Jan, 2006
113 - 22	WSR	30 Jan, 2006
113 - 23	WSR	30 Jan, 2006
113 - 24	NEP	30 Jan, 2006

Meacham, Thomas E.

Comment#	Issue	Submitted On
91 - 1	SMA	29 Dec, 2005
91 - 2	ACK	29 Dec, 2005
91 - 3	SMA	29 Dec, 2005
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Metcalf, Steve

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Metz, Michele

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20 - 1	NEP	10 Jan, 2006
20 - 2	ACK	10 Jan, 2006
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20 - 6	NEP	10 Jan, 2006

Meyer, Robert G.

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Meyer, Robert G.

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Mitchell, Karen

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F1 - 1	ACK	12 Dec, 2005
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Moore, Audrey

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Moran, Kate

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Moreno, Olyme

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Moss, Paul

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F1 - 1	ACK	11 Dec, 2005
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F1 - 5	ACK	11 Dec, 2005

Mullen, Elizabeth J.

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Mullen, Elizabeth J.

Comment#Issue Submitted On

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F1 - 5 ACK 08 Dec, 2005**N****Navarrete, Patty**

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F1 - 5 ACK 14 Dec, 2005**Negri, Regina**

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F1 - 5 ACK 10 Dec, 2005**Neiman, Karl**

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87 - 9 OHV 29 Dec, 2005
87 - 10 ACK 29 Dec, 2005
87 - 11 NEP 29 Dec, 2005**Nissl, Jan**

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F1 - 5 ACK 07 Dec, 2005**O****Oberg, Pamela**

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F1 - 5 ACK 07 Dec, 2005**Nilsson, Gregory**

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87 - 4 OHV 29 Dec, 2005

Obudzinski, Dirk

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Olson, Drake

ECA, Inc.

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82 - 1	ACK	28 Dec, 2005
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Oseman, Nance

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Osterberg, Nils

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O'sullivan, Joseph

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Pan, Pinky Jain

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Pavitt, Bridget

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Pedersen, John

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Pederson, John

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Perlman, Frances

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Perry, Mary-ellen

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Pethers, Katrina		Plato, Barry		Prang, Tom		Quaas, Agnes		
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Ramos, Miguel

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F2 - 1	ACK	13 Jan, 2006
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Reede, Tim

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Rehn, Debra

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Reichgott, Christine B.

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42 - 3	ACK	29 Dec, 2005
42 - 4	ACK	29 Dec, 2005
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42 - 6	NEP	29 Dec, 2005
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42 - 8	ACK	29 Dec, 2005
42 - 9	SMA	29 Dec, 2005
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Reichgott, Christine B.

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42 - 12	SMA	29 Dec, 2005
42 - 13	SMA	29 Dec, 2005
42 - 14	OHV	29 Dec, 2005
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42 - 16	ROP	29 Dec, 2005
42 - 17	EDI	29 Dec, 2005
42 - 18	ACK	29 Dec, 2005
42 - 19	CLI	29 Dec, 2005
42 - 20	CLI	29 Dec, 2005
42 - 21	CLI	29 Dec, 2005
42 - 22	COR	29 Dec, 2005
42 - 23	ACK	29 Dec, 2005
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Riley, Kelly

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Robinson, James

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Rodrigue, Jim

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Ringe, Axel C.

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Riolo, Marion

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Root, Charlene

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F1 - 3	ACK	18 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK
F1 - 4	SMA	18 Dec, 2005	F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA
F1 - 5	ACK	18 Dec, 2005	F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK
Scott, Stephanie K.		Shadrick, Roxann		Silver, Ronald H.		Shively, Daniel	
Haines Borough Assembly							
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Submitted On
26 - 1	SMA	27 Dec, 2005	F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK
26 - 2	SOC	27 Dec, 2005	F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA
26 - 3	SMA	27 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK
Seaman, Richard		Shalat, Harriet				Shohan, Doug	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Submitted On
F2 - 1	ACK	14 Jan, 2006	F1 - 1	ACK	07 Dec, 2005	F2 - 1	ACK
F2 - 2	SMA	14 Jan, 2006	F1 - 2	SMA	07 Dec, 2005	F2 - 2	SMA
F2 - 3	SMA	14 Jan, 2006	F1 - 3	ACK	07 Dec, 2005	F2 - 3	SMA
F2 - 4	VIS	14 Jan, 2006	F1 - 4	SMA	07 Dec, 2005	F2 - 4	VIS
F2 - 5	NEP	14 Jan, 2006	F1 - 5	ACK	07 Dec, 2005	F2 - 5	NEP
F1 - 1	ACK	07 Dec, 2005				F2 - 1	ACK
F1 - 2	SMA	07 Dec, 2005				F2 - 2	SMA
F1 - 3	ACK	07 Dec, 2005				F2 - 3	SMA
F1 - 4	SMA	07 Dec, 2005				F2 - 4	VIS
F1 - 5	ACK	07 Dec, 2005				F2 - 5	NEP
Seth, Barry		Sheldon, Burl		Simmons, Barre		Shook, Amy	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Submitted On
			84 - 1	NEP	29 Dec, 2005		
			84 - 2	ACK	29 Dec, 2005		
			84 - 3	WIL	29 Dec, 2005		
			84 - 4	SMA	29 Dec, 2005		
			84 - 5	ACK	29 Dec, 2005	F1 - 1	ACK
			84 - 6	SMA	29 Dec, 2005	F1 - 2	SMA

Simmons, Barre		Smith, Norman L.		Souza, Michael		Stauffer, Sybil					
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>
F1 - 5	ACK	15 Dec, 2005	F1 - 2	SMA	07 Dec, 2005	F1 - 4	SMA	07 Dec, 2005	F1 - 1	ACK	15 Dec, 2005
Simon, Philip			F1 - 3	ACK	07 Dec, 2005	F1 - 5	ACK	07 Dec, 2005	F1 - 2	SMA	15 Dec, 2005
			F1 - 4	SMA	07 Dec, 2005	F1 - 1	ACK	12 Jan, 2006	F1 - 3	ACK	15 Dec, 2005
			F1 - 5	ACK	07 Dec, 2005	F1 - 2	SMA	12 Jan, 2006	F1 - 4	SMA	15 Dec, 2005
			F2 - 1	ACK	14 Jan, 2006	F1 - 3	ACK	12 Jan, 2006	F1 - 5	ACK	15 Dec, 2005
			F2 - 2	SMA	14 Jan, 2006	F1 - 4	SMA	12 Jan, 2006	Stepanski, Dusty		
F1 - 1	ACK	12 Jan, 2006	F2 - 3	SMA	14 Jan, 2006	F1 - 5	ACK	12 Jan, 2006			
F1 - 2	SMA	12 Jan, 2006	F2 - 4	VIS	14 Jan, 2006	Spotts, Richard					
F1 - 3	ACK	12 Jan, 2006	F2 - 5	NEP	14 Jan, 2006						
F1 - 4	SMA	12 Jan, 2006	F1 - 1	ACK	23 Dec, 2005						
F1 - 5	ACK	12 Jan, 2006	F1 - 2	SMA	23 Dec, 2005						
Singer, Barbara			F1 - 3	ACK	23 Dec, 2005						
			F1 - 4	SMA	23 Dec, 2005						
			F1 - 5	ACK	23 Dec, 2005						
			F1 - 1	ACK	15 Dec, 2005						
			F1 - 2	SMA	15 Dec, 2005						
F2 - 1	ACK	15 Jan, 2006	F1 - 3	ACK	15 Dec, 2005						
F2 - 2	SMA	15 Jan, 2006	F1 - 4	SMA	15 Dec, 2005						
F2 - 3	SMA	15 Jan, 2006	F1 - 5	ACK	15 Dec, 2005						
F2 - 4	VIS	15 Jan, 2006	F1 - 1	ACK	07 Dec, 2005						
F2 - 5	NEP	15 Jan, 2006	F1 - 2	SMA	07 Dec, 2005						
F1 - 1	ACK	07 Dec, 2005	F1 - 3	ACK	07 Dec, 2005						
F1 - 2	SMA	07 Dec, 2005	F1 - 4	SMA	07 Dec, 2005						
F1 - 3	ACK	07 Dec, 2005	F1 - 5	ACK	07 Dec, 2005						
F1 - 4	SMA	07 Dec, 2005	F1 - 1	ACK	08 Dec, 2005						
F1 - 5	ACK	07 Dec, 2005	F1 - 2	SMA	08 Dec, 2005						
Smilyanov, Dimitar			F1 - 3	ACK	08 Dec, 2005						
			F1 - 4	SMA	08 Dec, 2005						
			F1 - 5	ACK	08 Dec, 2005						
Snead, Phyllis			Stahl, Charlotte								

Strebeck, Robert

Comment#	Issue	Submitted On
F2 - 1	ACK	14 Jan, 2006
F2 - 2	SMA	14 Jan, 2006
F2 - 3	SMA	14 Jan, 2006
F2 - 4	VIS	14 Jan, 2006
F2 - 5	NEP	14 Jan, 2006
F1 - 1	ACK	17 Dec, 2005
F1 - 2	SMA	17 Dec, 2005
F1 - 3	ACK	17 Dec, 2005
F1 - 4	SMA	17 Dec, 2005
F1 - 5	ACK	17 Dec, 2005

Street, Griffin

Comment#	Issue	Submitted On
F1 - 1	ACK	10 Dec, 2005
F1 - 2	SMA	10 Dec, 2005
F1 - 3	ACK	10 Dec, 2005
F1 - 4	SMA	10 Dec, 2005
F1 - 5	ACK	10 Dec, 2005

Sulanke, Thom

Comment#	Issue	Submitted On
F1 - 1	ACK	29 Dec, 2005
F1 - 2	SMA	29 Dec, 2005
F1 - 3	ACK	29 Dec, 2005
F1 - 4	SMA	29 Dec, 2005
F1 - 5	ACK	29 Dec, 2005

Sullivan, Kate

Comment#	Issue	Submitted On
F1 - 1	ACK	20 Dec, 2005
F1 - 2	SMA	20 Dec, 2005
F1 - 3	ACK	20 Dec, 2005
F1 - 4	SMA	20 Dec, 2005
F1 - 5	ACK	20 Dec, 2005

Sundberg, Scott

Comment#	Issue	Submitted On
80 - 1	ACC	
80 - 2	LAR	

Sundberg, Scott

Comment#	Issue	Submitted On
80 - 3	ACK	
80 - 4	SMA	
80 - 5	SMA	
80 - 6	SMA	
80 - 7	ACK	
80 - 8	ACK	
80 - 9	REC	
80 - 10	REC	
80 - 11	REC	

Taygan, Will

Comment#	Issue	Submitted On
11 - 2	LAR	14 Dec, 2005
11 - 3	ACK	14 Dec, 2005
11 - 4	OHV	14 Dec, 2005
54 - 1	ACK	
54 - 2	ACK	
54 - 3	SMA	
54 - 4	SMA	
54 - 5	VIS	
54 - 6	SMA	
54 - 7	ACK	
54 - 8	OHV	
54 - 9	OHV	

Swanson, Scott

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Sweel, Greg

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F2 - 1	ACK	12 Jan, 2006
F2 - 2	SMA	12 Jan, 2006
F2 - 3	SMA	12 Jan, 2006
F2 - 4	VIS	12 Jan, 2006
F2 - 5	NEP	12 Jan, 2006

T**Taygan, Will**

Comment#	Issue	Submitted On
11 - 1	ACK	14 Dec, 2005

Taygan, Will

Comment#	Issue	Submitted On
11 - 2	LAR	14 Dec, 2005
11 - 3	ACK	14 Dec, 2005
11 - 4	OHV	14 Dec, 2005
54 - 1	ACK	
54 - 2	ACK	
54 - 3	SMA	
54 - 4	SMA	
54 - 5	VIS	
54 - 6	SMA	
54 - 7	ACK	
54 - 8	OHV	
54 - 9	OHV	

Thompson, Cheryl

Comment#	Issue	Submitted On
F1 - 1	ACK	08 Dec, 2005
F1 - 2	SMA	08 Dec, 2005
F1 - 3	ACK	08 Dec, 2005
F1 - 4	SMA	08 Dec, 2005
F1 - 5	ACK	08 Dec, 2005
F2 - 1	ACK	14 Jan, 2006
F2 - 2	SMA	14 Jan, 2006
F2 - 3	SMA	14 Jan, 2006
F2 - 4	VIS	14 Jan, 2006
F2 - 5	NEP	14 Jan, 2006

Thomson, Arran

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Thornley, Emily

Comment#	Issue	Submitted On
F2 - 1	ACK	13 Jan, 2006
F2 - 2	SMA	13 Jan, 2006
F2 - 3	SMA	13 Jan, 2006
F2 - 4	VIS	13 Jan, 2006
F2 - 5	NEP	13 Jan, 2006

Thu, Eric

Comment#	Issue	Submitted On
F1 - 1	ACK	15 Dec, 2005
F1 - 2	SMA	15 Dec, 2005
F1 - 3	ACK	15 Dec, 2005
F1 - 4	SMA	15 Dec, 2005
F1 - 5	ACK	15 Dec, 2005
F1 - 1	ACK	24 Dec, 2005
F1 - 2	SMA	24 Dec, 2005
F1 - 3	ACK	24 Dec, 2005
F1 - 4	SMA	24 Dec, 2005
F1 - 5	ACK	24 Dec, 2005

Thurmond, Roberta		Tribble, David		Uhde, Eric		Vesely, Sak	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F2 - 1	ACK	12 Jan, 2006	F1 - 1	ACK	07 Dec, 2005	12 - 6	COR
F2 - 2	SMA	12 Jan, 2006	F1 - 2	SMA	07 Dec, 2005	12 - 7	SMA
F2 - 3	SMA	12 Jan, 2006	F1 - 3	ACK	07 Dec, 2005		
F2 - 4	VIS	12 Jan, 2006	F1 - 4	SMA	07 Dec, 2005		
F2 - 5	NEP	12 Jan, 2006	F1 - 5	ACK	07 Dec, 2005		
F1 - 1	ACK	07 Dec, 2005	F2 - 1	ACK	12 Jan, 2006		
F1 - 2	SMA	07 Dec, 2005	F2 - 2	SMA	12 Jan, 2006		
F1 - 3	ACK	07 Dec, 2005	F2 - 3	SMA	12 Jan, 2006		
F1 - 4	SMA	07 Dec, 2005	F2 - 4	VIS	12 Jan, 2006		
F1 - 5	ACK	07 Dec, 2005	F2 - 5	NEP	12 Jan, 2006		
Tildes, Katherine		Triplett, Tia		Updike, Kelley		Vincent, Judith	
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F1 - 1	ACK	15 Dec, 2005	F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK
F1 - 2	SMA	15 Dec, 2005	F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA
F1 - 3	ACK	15 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK
F1 - 4	SMA	15 Dec, 2005	F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA
F1 - 5	ACK	15 Dec, 2005	F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK
Tostenson, Kimberly		Turek, Gabriella		Urani, Thomas		Virgin, Randy	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	07 Dec, 2005	F2 - 1	ACK
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	07 Dec, 2005	F2 - 2	SMA
F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F2 - 3	SMA
F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA	07 Dec, 2005	F2 - 4	VIS
F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK	07 Dec, 2005	F2 - 5	NEP
Trepes, Karen		U		V		Vertrees, Gerald	
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
F2 - 1	ACK	16 Jan, 2006	F1 - 1	ACK	12 Jan, 2006	98 - 1	SMA
F2 - 2	SMA	16 Jan, 2006	F1 - 2	SMA	12 Jan, 2006	98 - 2	SMA
F2 - 3	SMA	16 Jan, 2006	F1 - 3	ACK	12 Jan, 2006	98 - 3	SMA
F2 - 4	VIS	16 Jan, 2006	F1 - 4	SMA	12 Jan, 2006		
F2 - 5	NEP	16 Jan, 2006	F1 - 5	ACK	12 Jan, 2006		
F1 - 1	ACK	24 Dec, 2005					
F1 - 2	SMA	24 Dec, 2005					
F1 - 3	ACK	24 Dec, 2005					
F1 - 4	SMA	24 Dec, 2005					
F1 - 5	ACK	24 Dec, 2005					
Uhde, Eric		Uhde, Eric		Vertrees, Gerald		Vogt, Deborah	
Alaska Center for the Environment							
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue
12 - 1	ACK	14 Dec, 2005	12 - 1	ACK	12 Jan, 2006	74 - 1	ACK
12 - 2	ACK	14 Dec, 2005	12 - 2	ACK	12 Jan, 2006	74 - 2	SMA
12 - 3	SMA	14 Dec, 2005	12 - 3	ACK	12 Jan, 2006	74 - 3	REC
12 - 4	OHV	14 Dec, 2005	12 - 4	SMA	12 Jan, 2006	74 - 4	SMA
12 - 5	ACK	14 Dec, 2005	12 - 5	ACK	12 Jan, 2006	74 - 5	SMA

Voorhies, Bill			Waldron, Robert			Wasman, Donna			Wendt, Diana		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005				F2 - 3	SMA	13 Jan, 2006	F2 - 5	NEP	13 Jan, 2006
F1 - 2	SMA	07 Dec, 2005				F2 - 4	VIS	13 Jan, 2006			
F1 - 3	ACK	07 Dec, 2005				F2 - 5	NEP	13 Jan, 2006			
F1 - 4	SMA	07 Dec, 2005									
F1 - 5	ACK	07 Dec, 2005									
F1 - 1	ACK	14 Dec, 2005									
F1 - 2	SMA	14 Dec, 2005									
F1 - 3	ACK	14 Dec, 2005									
F1 - 4	SMA	14 Dec, 2005									
F1 - 5	ACK	14 Dec, 2005									
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F2 - 2	SMA	12 Jan, 2006									
F2 - 3	SMA	12 Jan, 2006									
F2 - 4	VIS	12 Jan, 2006									
F2 - 5	NEP	12 Jan, 2006									
W			Walker, Elizabeth			Weishahn, Carolyn			Werner, Kirstyn		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
F1 - 1	ACK	08 Dec, 2005				F1 - 1	ACK	07 Dec, 2005			
F1 - 2	SMA	08 Dec, 2005				F1 - 2	ACK	07 Dec, 2005			
F1 - 3	ACK	08 Dec, 2005				F1 - 3	ACK	07 Dec, 2005			
F1 - 4	SMA	08 Dec, 2005				F1 - 4	ACK	07 Dec, 2005			
F1 - 5	ACK	08 Dec, 2005				F1 - 5	ACK	07 Dec, 2005			
F2 - 1	ACK	12 Jan, 2006									
F2 - 2	SMA	12 Jan, 2006									
F2 - 3	SMA	12 Jan, 2006									
F2 - 4	VIS	12 Jan, 2006									
F2 - 5	NEP	12 Jan, 2006									
Wacker, William			Wall, James			Welch, Joanna			Wick, David		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005				F1 - 1	ACK	07 Dec, 2005			
F1 - 2	SMA	07 Dec, 2005				F1 - 2	SMA	07 Dec, 2005			
F1 - 3	ACK	07 Dec, 2005				F1 - 3	ACK	07 Dec, 2005			
F1 - 4	SMA	07 Dec, 2005				F1 - 4	SMA	07 Dec, 2005			
F1 - 5	ACK	07 Dec, 2005				F1 - 5	ACK	07 Dec, 2005			
F2 - 1	ACK	14 Jan, 2006				F2 - 1	ACK	12 Jan, 2006			
F2 - 2	SMA	14 Jan, 2006				F2 - 2	SMA	12 Jan, 2006			
F2 - 3	SMA	14 Jan, 2006				F2 - 3	ACK	12 Jan, 2006			
F2 - 4	VIS	14 Jan, 2006				F2 - 4	SMA	12 Jan, 2006			
F2 - 5	NEP	14 Jan, 2006				F2 - 5	ACK	12 Jan, 2006			
Wade, Doug			Walters, L.			Wells, Kathy			Wieland, Loren		
Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On	Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005				F1 - 1	ACK	20 Dec, 2005			
F1 - 2	SMA	07 Dec, 2005				F1 - 2	SMA	20 Dec, 2005			
F1 - 3	ACK	07 Dec, 2005				F1 - 3	ACK	20 Dec, 2005			
F1 - 4	SMA	07 Dec, 2005				F1 - 4	SMA	20 Dec, 2005			
F1 - 5	ACK	07 Dec, 2005				F1 - 5	ACK	20 Dec, 2005			
F2 - 1	ACK	23 Jan, 2006				F2 - 1	ACK	12 Jan, 2006			
F2 - 2	SMA	23 Jan, 2006				F2 - 2	SMA	12 Jan, 2006			
F2 - 3	AKN	23 Jan, 2006				F2 - 3	ACK	12 Jan, 2006			
F2 - 4	ACK	23 Jan, 2006				F2 - 4	SMA	12 Jan, 2006			
F2 - 5	NEP	23 Jan, 2006				F2 - 5	ACK	12 Jan, 2006			
Waldron, Robert			Wasman, Donna			Wendt, Diana			Wiley, Carol		
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F1 - 1	ACK	07 Dec, 2005				F1 - 1	ACK	12 Jan, 2006			
F1 - 2	SMA	07 Dec, 2005				F1 - 2	SMA	12 Jan, 2006			
F1 - 3	ACK	07 Dec, 2005				F1 - 3	ACK	12 Jan, 2006			
F1 - 4	SMA	07 Dec, 2005				F1 - 4	SMA	12 Jan, 2006			
F1 - 5	ACK	07 Dec, 2005				F1 - 5	ACK	12 Jan, 2006			
F2 - 1	ACK	13 Jan, 2006				F2 - 1	ACK	08 Dec, 2005			
F2 - 2	SMA	13 Jan, 2006				F2 - 2	SMA	08 Dec, 2005			
F2 - 3	ACK	13 Jan, 2006				F2 - 3	SMA	08 Dec, 2005			
F2 - 4	VIS	13 Jan, 2006				F2 - 4	VIS	08 Dec, 2005			
F2 - 5	NEP	13 Jan, 2006									

Wiley, Carol

Comment#	Issue	Submitted On
F1 - 2	SMA	08 Dec, 2005
F1 - 3	ACK	08 Dec, 2005
F1 - 4	SMA	08 Dec, 2005
F1 - 5	ACK	08 Dec, 2005

Williams, Paul

Comment#	Issue	Submitted On
F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Williams-west, Jeanie

Comment#	Issue	Submitted On
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	12 Jan, 2006
F1 - 2	SMA	12 Jan, 2006
F1 - 3	ACK	12 Jan, 2006
F1 - 4	SMA	12 Jan, 2006
F1 - 5	ACK	12 Jan, 2006

Wilmore, Seth

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F1 - 1	ACK	07 Dec, 2005
F1 - 2	SMA	07 Dec, 2005
F1 - 3	ACK	07 Dec, 2005
F1 - 4	SMA	07 Dec, 2005
F1 - 5	ACK	07 Dec, 2005

Wilson, Jennifer

Comment#	Issue	Submitted On
49 - 1	ACK	16 Nov, 2005
F2 - 1	ACK	15 Jan, 2006
F2 - 2	SMA	15 Jan, 2006

Wilson, Jennifer

Department of Transportation & Public

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F2 - 3	SMA	15 Jan, 2006
F2 - 4	VIS	15 Jan, 2006
F2 - 5	NEP	15 Jan, 2006
F1 - 1	ACK	11 Dec, 2005
F1 - 2	SMA	11 Dec, 2005
F1 - 3	ACK	11 Dec, 2005
F1 - 4	SMA	11 Dec, 2005
F1 - 5	ACK	11 Dec, 2005
F1 - 1	ACK	14 Dec, 2005
F1 - 2	SMA	14 Dec, 2005
F1 - 3	ACK	14 Dec, 2005
F1 - 4	SMA	14 Dec, 2005
F1 - 5	ACK	14 Dec, 2005
F1 - 1	ACK	27 Dec, 2005
F1 - 2	SMA	27 Dec, 2005
F1 - 3	ACK	27 Dec, 2005
F1 - 4	SMA	27 Dec, 2005
F1 - 5	ACK	27 Dec, 2005

Wold, Amy

Comment#

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12 Jan, 2006

F1 - 5

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14 Dec, 2005

F1 - 1

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15 Dec, 2005

F1 - 3

ACK

15 Dec, 2005

F1 - 4

SMA

15 Dec, 2005

F1 - 5

ACK

15 Dec, 2005

F1 - 1

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07 Dec, 2005

F2 - 2

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07 Dec, 2005

F2 - 3

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07 Dec, 2005

F2 - 4

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07 Dec, 2005

F2 - 5

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07 Dec, 2006

F1 - 1

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12 Jan, 2006

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F2 - 4

SMA

13 Jan, 2006

F2 - 5

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13 Jan, 2006

F1 - 1

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08 Dec, 2005

F2 - 1

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28 Dec, 2005

F2 - 2

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28 Dec, 2005

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28 Dec, 2005

F2 - 4

SMA

08 Dec, 2005

F2 - 5

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28 Dec, 2005

F1 - 1

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08 Dec, 2005

F1 - 2

SMA

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08 Dec, 2005

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08 Dec, 2005

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F2 - 5</

Wyer, D.		Yates, Joan		Zajic, Daniel		Zimny, Gloria	
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>
F1 - 3	ACK	07 Dec, 2005	F2 - 1	ACK	13 Jan, 2006	F1 - 1	ACK
F1 - 4	SMA	07 Dec, 2005	F2 - 2	SMA	13 Jan, 2006	F1 - 2	SMA
F1 - 5	ACK	07 Dec, 2005	F2 - 3	SMA	13 Jan, 2006	F1 - 3	ACK
Wyse, Frank		Young, Jane		Zalewski, Kimberly		Zimny, Gloria	
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>
F1 - 1	ACK	14 Dec, 2005	F2 - 1	ACK	16 Jan, 2006	F1 - 1	ACK
F1 - 2	SMA	14 Dec, 2005	F2 - 2	SMA	16 Jan, 2006	F1 - 2	SMA
F1 - 3	ACK	14 Dec, 2005	F2 - 3	SMA	16 Jan, 2006	F1 - 3	ACK
F1 - 4	SMA	14 Dec, 2005	F2 - 4	VIS	16 Jan, 2006	F1 - 4	SMA
F1 - 5	ACK	14 Dec, 2005	F2 - 5	NEP	16 Jan, 2006	F1 - 5	ACK
X		Yung, Jackie		Zeinstra, Juanita		Zimny, Gloria	
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>
F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA
F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK
F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA	07 Dec, 2005	F1 - 4	SMA
F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK	07 Dec, 2005	F1 - 5	ACK
Y		Yakel, Michelle		Yurkiw, Dorothy		Zimny, Gloria	
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>
F1 - 1	ACK	09 Dec, 2005	F1 - 1	ACK	15 Dec, 2005	F1 - 1	ACK
F1 - 2	SMA	09 Dec, 2005	F1 - 2	SMA	15 Dec, 2005	F1 - 2	SMA
F1 - 3	ACK	09 Dec, 2005	F1 - 3	ACK	15 Dec, 2005	F1 - 3	ACK
F1 - 4	SMA	09 Dec, 2005	F1 - 4	SMA	15 Dec, 2005	F1 - 4	SMA
F1 - 5	ACK	09 Dec, 2005	F1 - 5	ACK	15 Dec, 2005	F1 - 5	ACK
Yates, Joan		Z		Zajic, Daniel		Zimny, Gloria	
<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>	<i>Submitted On</i>	<i>Comment#</i>	<i>Issue</i>
F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK	07 Dec, 2005	F1 - 1	ACK
F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA	07 Dec, 2005	F1 - 2	SMA
F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK	07 Dec, 2005	F1 - 3	ACK
F1 - 4	SMA	07 Dec, 2005	F1 - 4	NEP	07 Dec, 2005	F1 - 4	NEP
F1 - 5	ACK	07 Dec, 2005	F1 - 5	NEP	07 Dec, 2005	F1 - 5	NEP

ATTACHMENT B

FORM LETTER RESPONSE INDEX

Form #1

<u>Comment #</u>	<u>Comment Text:</u>	<u>Response</u>	<u>Issue(s):</u>
1	I am writing to comment on the Draft Ring of Fire Resource Management Plan. As someone who is very concerned with protecting our country's wild public lands, I was pleased to learn that the BLM's preferred alternative, Alternative D, adopts many of the excellent conservation-minded concepts proposed in the Conservation Alternative, C.		ACK
2	I urge the BLM to adopt the protective measures outlined in Alternative C, including the creation of new Special Recreation Management Areas, and especially the Neacola Mountains Area of Critical Environmental Concern, in order to protect our wild rivers, wilderness-quality landscapes, sensitive wildlife habitat, and other natural resources.	Although Alternative C is not BLM's Proposed Action, Alternative D would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC, designate BLM-managed lands in the Knik River and Haines Block as Special Recreation Management Areas, and would delineate travel management for off-highway vehicle use as "Limited".	SMA
3	I was pleased to learn about the proposed 229,000-acre Neacola Mountains and Blockade Glacier Area of Critical Environmental Concern, such a short distance from Anchorage. Protection of these incredible scenic resources and recreation opportunities for the enjoyment of future generations is absolutely necessary today.		ACK
4	The proposed Knik River and Haines Area Special Recreation Management Areas also afford an excellent opportunity to protect recreation opportunities, as well as mountain goat habitat. I think it's crucial that these management objectives emphasize enforcement of responsible regulations for commercial tourism and off-highway vehicle usage, and take strong steps to minimize adverse impacts to wildlife and wild lands associated with these activities.	BLM recognizes the varied recreation opportunities that the Knik River Valley has to offer, and has assigned the "limited" OHV classification to the area. We intend to further define the management of the Knik River SRMA through the development of an implementation plan, which will incorporate the goals (Appendix F) for the SRMA. BLM is committed to working with all of the interested parties as part of its planning process.	SMA
5	I urge the BLM to adopt and implement these conservation measures as part of its final resource management plan for Alaska's Ring of Fire area.	BLM will assess and manage areas and, if necessary, can use seasonal closures, off-sets, and trail designations to mitigate damage to sensitive areas. BLM may also, during the development of the implementation plan for the Knik River SRMA, determine that there are areas which should be managed to allow additional OHV use.	ACK

Form #2

<u>Comment #</u>	<u>Comment Text:</u>	<u>Response</u>	<u>Issue(s):</u>
1	I am writing to comment on the Draft Ring of Fire Resource Management Plan.		ACK
2	As someone who is very concerned with protecting our country's wild public lands, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	The Proposed Action (D) would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC, but the Chilligan River tract would not be included in the ACEC. The boundaries of the Neacola Mountains ACEC are based on our analysis of the scenic and other resource values of the area. Other areas were considered but not included in the ACEC. BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable laws. BLM will consider the management of the adjoining lands and attempt to be as consistent in our management as allowed by our policies.	SMA
3	I encourage you to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 2 under Form Letter #2. Also, please reference the ACEC decision matrix in Section 2.2.	SMA
4	Additionally, Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	The Proposed Action (D) would designate the Neacola Mountains as an ACEC with a VRM Class of II.	VIS
5	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	Under NEPA (40 CFR 1500-1506), BLM is required to make the Draft RMP/EIS and supporting documents available to the public, agencies, and Native entities for review, with appropriate time for interested parties to provide comments. BLM saw it necessary to extend the comment period in order to provide a thorough review of the Draft RMP/EIS revisions. BLM appreciates your participation in the review process and comment period.	NEP

ATTACHMENT C
RESPONSE INDEX

Access/Travel Management

Comment #	Comment	Response
24 - 13	While transportation and access was considered, but not further analyzed in the study, future development of BLM properties should identify suitable ground transportation and access. Efficient transportation systems can be accomplished by ensuring interconnected roads and adequate road design to accommodate emergency vehicles and equipment.	The Proposed RMP/Final EIS does not identify specific transportation corridors due to the fragmented land ownership and the uncertainty of future land transfers. As land transfers are completed and future planning activities occur, transportation and access would be re-evaluated.
31 - 2	We wish to retain motorized access to the public lands in the Knik River Valley in case of future land transfers to Native Corporations.	ANILCA allows for "appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation." BLM also has the responsibility under ANCSA 17(b) to identify and reserve appropriate public access across private lands to access public lands.
31 - 3	We think it is entirely appropriate to include 17b easements through those potential upcoming land transfers as was done by the BLM in other areas of Alaska including the Butte area such as the Burnt Butte Trail and the RS 2477 right of Way Trail (RS17) to the Knik Glacier. The 17b easements will assure access to the public lands beyond the private land areas. The existing RS17 trail Right-of-Way, as designated by the State of Alaska, passes through the proposed land transfers near Wolf Point.	The process identifying, considering, and reserving ANCSA Sec. 17(b) easements is a required element of land transfer. Currently there is no RS 2477 assertion for RS 17.
41 - 10	2. Include Effective transportation provisions -Broad latitude must be included to allow new transportation infrastructure to be developed in the most feasible ways possible. The need is to establish a straight-forward predictable process to develop future infrastructure. We do not know exactly where all of the mineral and energy resources are located so we cannot predict where and what type of transportation infrastructure will be needed. The need, therefore, is to implement an infrastructure planning process that will readily accommodate future resource discoveries and allow infrastructure to be reasonably developed.	Please see response to comment 24-13 under Access/Travel Management.

Access/Travel Management

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
80 - 1	<p>Access</p> <p>I believe that the preferred alternative D will limit access to these very remote primitive region in which OHV and other means of transportation are not available.</p>	<p>The preferred decision for all areas within this plan is to delineate travel management for off-highway vehicle use as "Limited". This delineation will limit use to existing roads and trails (National Mgt. Strategy for Motorized OHV Use on Public Lands, DOI, January 2001). Implementation of Limited use area designations for OHVs would be effective immediately after signature of the decision record. BLM's goal is to manage and maintain a diversity of recreation opportunities. A key to managing for a primitive recreation experience is the management of motorized use. By taking the management direction indicated in Alternative D (the Preferred Alternative), BLM sets the stage to proactively manage to maintain a range of recreation experiences, particularly on lands managed long-term by the BLM. In some cases this can be done in a non-regulatory fashion by controlling un-managed proliferation of motorized trails. In other cases, particularly where use trends are increasing, some regulation may be required.</p>
119 - 93	<p>The Draft RMP/EIS did not adequately assess the issue of managing existing or future ANCSA § 17(b) public easements. We request that the Final RMP/EIS propose a coordinated strategy to locate, identify and proactively manage ANCSA § 17(b) easements, as established by the BLM Section 17(b) Public Easement Program. This includes prioritizing enforcement. We agree with the criteria and goals put forth in the BLM Resource Advisory Committee Resolution of February 18, 1999.</p> <p>BLM also should address any public easements that were not completed in its 2001 review of all public easements ANCSA § 17(b) easement cases, if any exist.</p>	<p>The Draft RMP/EIS states "realignment of 17(b) easements would be considered with the cooperation of the land owner on lands already conveyed." Where documented resource damage is occurring, BLM will, in consultation and cooperation with the land owner, State and other federal agencies and the public, consider re-location of the 17(b) easement or maintenance of selected areas, based on priorities. These actions are discretionary and will be contingent on funding approval. Please see response to comment 31-3 under Access/Travel Management.</p>
119 - 94	<p>The Final RMP/EIS should address the impacts of the State navigable waters issue as a method of accessing public lands. The Draft RMP/EIS does not adequately assess this issue.</p>	<p>Nothing in the Proposed RMP/Final EIS affects lands that are not managed by BLM. The State of Alaska has the final say on the river's use.</p>

End of section on Access/Travel Management

Alaska Natives

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
20 - 5	<p>The document states that the BLM will maintain contact with appropriate Native tribal governments. In the Haines-Skagway area of Southeast Alaska the BLM should include:</p> <ol style="list-style-type: none"> 1. Chilkat Indian Village 2. Chilkoot Indian Association 3. Skaqua Traditional Council 4. Tlingit-Haida Central Council 	Thank you, comment acknowledged.
35 - 3	<p>We are happy to comment on this issue and look forward to continuing our Government to Government relationship in the future.</p>	Thank you, comment acknowledged.
119 - 11	<p>We commend BLM on its March 2005 decision to establish new procedures to clarify its management responsibility to proactively work with local, state and tribal governments as cooperating agencies during the preparation of planning documents and environmental impact statements (43 CFR Part 1600). These procedures will ensure broader local public participation in federal resource management decisions and ultimately result in more effective on-the-ground, cooperative solutions among adjacent land managers. Throughout the Ring of Fire RMP/EIS public process, we have been reassured by the helpful assistance of the Anchorage Field Office planning staff. We also appreciate the numerous public meetings that BLM has held in local communities and with organizations affected by BLM's proposals in the Draft RMP/EIS. The government-to-government relationships between BLM and the federally recognized Tribes of the region were an essential and appreciated component of the public process. We hope that BLM Alaska's future RMP processes adopt a similar approach to the government-to-government relations.</p>	<p>Please see response to comment 6-2 under NEPA Compliance. BLM will continue to consult with Tribes during implementation of the plan.</p>

End of section on Alaska Natives

Alternatives

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
7 - 8	The next comment is on the Palmer Hay Flats. The no surface occupancy and limited seasonal restrictions in Alternative C, I think, should be a preferred alternative for the Palmer Hay Flats BLM lands due to waterfowl and migratory bird habitats.	Future actions are subject to the application of the ROPs and/or stipulations as appropriate, and will also go through the NEPA process which may develop mitigation measures related to the potential impacts of the activity being considered. Seasonal restrictions on lands open to fluid mineral leasing for the Palmer Hay Flats are contained in the Proposed Action, Alternative D.
34 - 4	1) Mountain Goat Monitoring and Control Area (M&C Area) The DEIS states that "Alternative A represents the continuation of current management practices." See DEIS at 2-3. The M&C Area was created in 2002, and BLM has managed it as a M&C Area ever since. Therefore, Alternative A should be changed to reflect the fact that the M&C Area is a continuation of current management practices. Since no developments are anticipated for the M&C Area under Alternative B, Alternative B should also include the M&C Area, as would Alternatives C and D, as proposed in the DEIS.	BLM has not designated the M&C Area as a Special Management Area, but created the M&C Area in 2002 for the purpose of data analysis as part of its mountain goat study in the Haines area. Continuance of the M&C Area is contingent on the determination that BLM will continue to study the mountain goat population, which will be a consideration during the development of the implementation-level plan for the Haines area.
34 - 19	An ACEC/RNA designation would satisfy the requirement for resolving the helicopter/goat issue by providing truly different management scenarios. In 2004, LCC proposed two Special Management Areas (SMA): a management area north of the existing M&C Area to accommodate increasing levels of helicopter supported recreation, and an ACEC/RNA elsewhere to protect goats and wildlife from impacts of increasing levels of helicopter-supported recreation. In an effort to satisfy the requirements of planning process step 5, we now propose the following: That Alternative C, the conservation alternative, place all Haines Block lands in an ACEC, with the current M&C Area and lands adjacent to Glacier Bay to be managed as an RNA. That Alternative D, a balance between use and protection, contain the following two special management areas - a SRMA to be managed for recreational uses, and an ACEC/RNA to protect Haines' identified outstanding wildlife resources. The ACEC/RNA for Alternative D would include the existing M&C Area and lands adjacent to Glacier Bay National Park. The SRMA would include lands north of the M&C Area. This new proposal creates a range of alternatives that resolve the major planning issue while emphasizing different management scenarios. Alternatives A and B would be as proposed in the DEIS (after modification to correct the DEIS error of omitting the existing M&C Area), Alternative C would provide a conservation alternative, and Alternative D would be a viable balance between resource development and conservation. This approach also complies with BLM's mandate that alternatives address and/or resolve the identified planning issue in different ways. See Handbook at 21.	Please see responses to comments 26-1 and 26-3 under Special Management Areas. It is at the implementation level of planning that distinct alternatives for the management of the Haines Block SRMA will be presented to the public for comment.

Alternatives

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
34 - 30	Consider all reasonable alternatives as mandated by NEPA. See Handbook at 20. Given the rigors outlined in the planning process, the ACEC/RNA is a reasonable alternative and must be considered.	Please see response to comment 26-3 under Special Management Areas.
73 - 2	As I understand it, Alternative C prohibits oil and gas exploration activity or road building on the Palmer Hay Flats from March 15 to June 1, and from September 1 to October 31, as well as No Surface Occupancy to protect waterfowl habitat for migratory birds. I am writing because I would like to see this language included in Alternative D as well (I understand this to be the preferred Alternative).	See response to comment 7-8 under Alternatives.
73 - 5	Please add No Surface Occupancy for Palmer Hay Flats and protection from oil and gas development and road building to Alternative D.	See response to comment 7-8 under Alternatives.
119 - 3	With the understanding that a great deal of community involvement, hard work, and interagency coordination went into this process, we do not find the current preferred alternative to strike a balance between conservation of the resources and development within the planning area.	While the Proposed Action would increase the amount of land available for development when compared to Alternative A or C, we believe that Alternative D balances conservation with development. One ACEC and two SRMAs will be established, and all BLM-managed land will be classified as "limited" to OHV use. Two small parcels and the ACEC will be managed for VRM II. Development, where allowed, will be subject to the ROPs and stipulations in Appendix D which are the minimum guidelines that will be used to ensure that resource impacts will be mitigated, on a site-specific basis, during the NEPA process associated with the Plan of Operations review and approval. Additionally, commercial activities will be subject to permitting and consultation requirements under the Clean Water Act, Clean Air Act, Migratory Bird Treaty Act, and other local, State, and federal requirements.

Alternatives

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 70	<p>Recommended Visual Resource Management Classes</p> <p>VRM Class I</p> <p>-Neacola Mountains ACEC, especially the Blockade Glacier tract.</p> <p>VRM Class II</p> <p>-Portions of the Neacola Mountains ACEC, including the Chiligan River tract.</p> <p>-Haines Area SRMA</p> <p>All other BLM-managed lands should be managed to uphold the objectives of VRM Classes II and III in order to retain and preserve the existing undeveloped characteristics of the visual resources.</p>	Please see responses to comments 13-4 and 119-67 under Visual Resources.
119 - 91	<p>Thus, BLM should maintain the ANCSA § 17 (d) (1) withdrawals in the following areas until similar, appropriate protective measures are instituted:</p> <ol style="list-style-type: none"> 1. The unencumbered BLM lands within the proposed Neacola Mountains ACEC to conserve the pristine nature of the outstanding scenic, wildlife and recreation values. 2. Areas of traditional subsistence activity, and cultural or historical importance, including such unsurveyed locations as, Chiligan River, Iniskin River, Kirschner Lake, McArthur River, Nagishlamina River, Taklin River, Tsirku River, Buskin River, Elbow Creek, Kashwitna River, King's River, Ship Creek, and other areas where there may be moderate to high potential for cultural resource findings due to historic human habitation associated with these anadromous streams, significant waterbodies, and travel corridors. 3. The fourteen rivers identified as eligible Wild & Scenic Rivers for the protection and preservation of their ORVs. 4. The 273,000 acres within the proposed Haines Area SRMA for the protection of the visual resources and wildlife habitat upon which the local tourism industry depends. According to Mr. Lloyd's presentation at public meetings, BLM expects to likely retain permanent ownership of these Haines area lands because there is currently little or no identified State priority for their conveyance. We recommend that BLM also maintain the ANCSA § 17 (d)(1) withdrawals on the proposed Haines Area SRMA lands in the event that the State relinquishes its selections. 5. All lands assigned VRM Class I and II. 	In those areas where the temporary withdrawal of public lands provided by Section 17(d)(1) of ANCSA has fulfilled its purpose of resolving potential land status conflicts, it is appropriate to revoke the withdrawal and manage the lands according to multiple use concepts consistent with the resource values present. It is important to note that for the majority of the planning area the lifting of these withdrawals will have little or no effect on disposition of those lands because the lands have been selected by either the State or by an ANCSA corporation, and BLM is limited in committing use of those lands until selection status is resolved.

Alternatives

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 114	<p>Lands recognized as containing outstanding resource values should not be considered for leasable or locatable mineral entry. The following areas should be closed to leasing, exploration, and development:</p> <ul style="list-style-type: none"> - All portions of eligible Wild and Scenic River corridors ; - All lands within the proposed Neacola Mountains ACEC, and the proposed Haines Area SRMA/RNA; - The Palmer Hay Flats parcels; - Lands within 400 feet of anadromous rivers and streams; - Lands assigned VRM Class I and II throughout the planning area; - Critical brown bear habitat along the Iniskin River; - Lands on the Alaska Peninsula, especially those near or adjacent to Steller's Eider and Steller Sea Lion critical habitat; - Critical moose winter range; areas within ¼ mile of historically active bald eagle and osprey nest sites; lands adjacent to communities and residential areas. 	<p>BLM is a multiple-use agency and as such, is tasked with considering a variety of proposals on public lands. Site-specific mitigation can be accomplished through the application of the NEPA process and through the assignment of ROPs and stipulations (Appendix D), as appropriate to the location and proposal. No locatable mineral development will occur without a Plan of Operations, which contain site-specific ROPs and stipulations, as well as abiding by all federal and state laws and regulations. Mineral activities will be monitored using existing BLM 3809 regulations. Under the Proposed Action, no WSR corridors were recommended as suitable for designation. However, the values of the 14 eligible river segments will be taken into consideration when BLM considers future permit applications in those areas. BLM manages public lands for multiple uses in accordance with the Federal Land Policy and Management Act (FLPMA). Land use decisions are made that protect the resources while allowing different uses of those resources, such as energy development, and recreation. Where there are conflicts between resource uses, or where a land use activity may result in unacceptable or irreversible impacts to the environment, BLM may restrict or prohibit some land uses in specific areas. These are areas where it has been determined that other land uses or resource values cannot be adequately protected, and appropriate protection can be ensured only by closing the land to leasing through either statutory or administrative requirements. While some of these areas contain resources that may warrant special considerations, they will be managed through mitigation measures developed through the NEPA process, and the application and enforcement of stipulations and ROPs. Additionally, BLM considers the management strategies of neighboring land owners and, when determined appropriate, will incorporate those strategies into its management.</p>

End of section on Alternatives

Cumulative Effects

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
16 - 4	Evaluation of impacts on BLM lands also needs to include flight corridors utilized in accessing BLM lands. Permitted landings on BLM land have impacts on non-BLM lands.	The cumulative effects analyses presented in Section 4.4 of the Proposed RMP/Final EIS considers all past, present, and reasonably foreseeable future actions, including overflights, to determine potential impacts from BLM management alternatives. Also, BLM considers impacts to neighboring lands, including impacts to their associated resources and uses, when permitting landings on BLM lands. BLM has acknowledged disturbances created by helicopters and has addressed these by establishing horizontal and vertical distance restrictions as wildlife protective measures in critical areas. BLM also has administrative authority over the permitting of landing locations on its lands. Flight paths or corridors are not within BLM's area of authority. However, as part of the permitting process, the permittee is required to adhere to the standards and regulations of other agencies.
79 - 7	I would strongly suggest that the limited commercial and economic benefits from helicopter use are negated by the visual, social, auditory, and wildlife impacts.	Thank you, comment acknowledged.
87 - 3	Much damage has occurred for the past 25 years on these lands. We have noticed considerable increase (up to 3,000 recreationists on a sunny weekend) of people visiting the area. The cumulative damage to habitat, fish, wildlife and quality of life for residents is widely known.	BLM shares your concern regarding intensive recreation use in the Knik River area. Refer to comment 22-13 under Recreation regarding development of implementation plans for this area.
119 - 33	Finally, the Draft RMP/EIS failed to analyze the direct, indirect, and cumulative impacts of recommending rivers as suitable or un-suitable for designation, as required by NEPA. We request that BLM amend the draft plan to include an analysis of the specific impacts of designation or non-designation of each eligible river segment upon recreation opportunities, fisheries, wildlife, historic and cultural values, local economies, subsistence, scientific and educational opportunities, and all other significant impacts.	See response to comment 113-3 under Wild and Scenic Rivers.

Cumulative Effects

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 116	BLM cumulative impacts analysis for Leasable and Locatable Minerals was similarly flawed. Its analysis of the cumulative impacts of mineral development under each of the four alternatives lacked any identification or analysis of the environmental impacts of the projected increased mineral entry and subsequent mineral exploration and development. Instead, BLM's analysis focused on the "cumulative impacts to oil and gas resources" rather than on the cumulative impacts to the environment. This stands NEPA on its head.	<p>See response to comment 119-99 under Leasable Minerals.</p> <p>Past, present, and reasonably foreseeable mineral developments are considered in the impact analyses for each resource. Section 4.4.4.2 does address the impacts to leasable minerals. However, cumulative impacts from all mineral activities are addressed by resource program in Section 4.4.3 (Resources section). The analysis is structured so that effects FROM potential mineral entry ON other resources are discussed under that particular affected resource (e.g., wetlands). Chapter 4 and the ROPs and stipulations (Appendix D) were written for the protection of sensitive resources on BLM lands.</p> <p>The Fluid Leasable Minerals objective (Section 2.3.2.1) states that all fluid minerals actions will comply with goals, objectives, and resource restrictions (mitigations) to protect other resource values on BLM-managed lands within the planning area. Environmental impacts for leasable and locatable minerals were discussed in the preceding sections by resource. There is no need to restate them if the consequences are the same across all alternatives. No locatable mineral development will occur without a Plan of Operations, which contain site-specific ROPs and stipulations, as well as abiding by all federal and State laws and regulations. Mineral activities will be monitored using existing BLM 3809 regulations.</p>

End of section on Cumulative Effects

Climate Change

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 25	2.5.3 Wildland Fire and Fuels, page 2-34 through 36. We question whether it is reasonable to expect that BLM can maintain key ecosystem components intact and functioning "within their historical range" given our understanding of changes in climate. (page 2-35)	Thank you, comment acknowledged. Climate change may cause changes to vegetative communities that are beyond the control of BLM. BLM will respond to changes in management conditions as deemed necessary. Please also see response to comment 42-19 under Climate Change.
42 - 19	While land use changes are drivers of environmental and climatic changes, climate changes can, in turn, affect land cover and land use. The BLM has the opportunity during their RMP process to develop innovative and effective resource management strategies that recognize and identify changes to land cover due to climate change, which could influence land use and resource development options.	The BLM recognizes the importance of climate change and the potential impacts it may have on the natural environment. BLM land use management practices are based on goals and objectives that are established for different geographical areas. These established land uses are based on numerous criteria, including land cover and historical land uses. If climate change continues to have an effect on BLM-managed resources and programs, or use changes in a management area, BLM will re-evaluate the land management status for that given area and adjust management accordingly.
42 - 20	We acknowledge that the interaction between land use and climate change is complex and not fully understood at this time. However, we recommend the BLM recognize the need for land management strategies that anticipate and monitor for changes in land cover potentially due to climate change, and that consider potential changes to climate due to land use decisions and resource development.	See response to comment 42-19 under Climate Change.
42 - 21	Opportunities to document baseline environmental conditions and monitor for climate change indicators such as glacier cover, wildlife migration patterns and permafrost depths may exist on BLM-managed areas within the Ring of Fire planning area.	See response to comment 42-19 under Climate Change.

Climate Change

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 132	<p>Global climate change threatens to dramatically impact the Ring of Fire planning area during the life span of the Draft RMP/EIS. Thus, BLM should have provided more information on how the agency plans to implement policies tailored to the expected changes. In particular, we encourage BLM to specify how expected changes to permafrost will be incorporated into transportation corridor planning, OHV use, and oil, gas and mineral extraction. This should include expected impacts to water quality from oil, gas and mineral leasing as the permafrost melts and the impacts on wildlife from leasing as migration patterns change. We also encourage BLM to proactively look at how changes to wildlife patterns will affect subsistence use in this area. BLM should address these issues in the Final RMP/EIS.</p>	<p>Thank you, comment acknowledged. Please see Section 3.2.1, and the analyses of cumulative effects located in Chapter 4.</p>

End of section on Climate Change

Coordination and Compatibility

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
12 - 6	Our worries are that the Alaska Department of Natural Resources will be unable to keep these unmanaged activities and damage associated with such activities to solely State land. Surely the effects will be observed on the BLM land if the planning process is not started.	Both ADNR and BLM must deploy limited enforcement resources judiciously. By coordinating where possible, the enforcement capacity can be maximized to prevent adverse impacts to Federal or State managed lands.
16 - 7	Apply science from Yellowstone and other federal lands to Ring of Fire.	Thank you, comment acknowledged.
17 - 5	Further, AQRC is concerned that should pending state legislation to create a Knik River Public Use Area be enacted, BLM will conform its management to it.	Thank you, comment acknowledged. Under the Proposed Action, BLM will develop management measures for the Knik River SRMA through an implementation level plan, coordinated with, but not subservient to, State management approaches.
17 - 8	Finally, AQRC believes tying the designation of "limited" to the state's policy set forth in "Generally Allowed Uses" in the proposed special management areas is misguided. The policy contains a huge loophole by allowing the phrase "whenever possible" to modify the requirement that OHVs must remain on existing roads and trails. This loophole precludes any and all enforcement since it is the user who interprets when it is possible, or not, to stay on the road or trail.	Disagree. Under BLM's use of the "limited" designation, during the development of implementation-level plans (Special Recreation Management Plan for the Knik River), BLM will assess and manage areas and, if necessary, can use seasonal closures, off-sets and trail designations to mitigate damage to sensitive areas. BLM may also, during the development of the implementation plan for the area, determine that there are areas which should be managed to allow additional OHV use.
17 - 10	AQRC believes adoption of the state's policy unnecessarily ties BLM's enforcement actions during the period of time between the ROD, approving the Plan, and the completion of the implementation planning in the special management areas. This could be along period of time since the Plan states that the priority for implementation planning will be the unencumbered lands in the ACEC. During this time, for example, what enforcement action can BLM take on its 80,000 acres in the Knik River SRMA under the state's policy?	BLM recognizes the conditions which currently exist in the Knik River area, including potential risks to the area's resources and public safety. BLM intends to pursue the increased management of this area on a collaborative basis with Law Enforcement staff and the surrounding land owners as an interim management measure.

Coordination and Compatibility

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
22 - 20	Finally (though I have only touched the surface of concerns); it will be impossible for BLM to implement reasonable goals in the watershed should the Huggins/Stoltze bills (HB307, SB 197) become law without a complete makeover. There is no 'wall' between the two properties and the special interest legislation has extreme shortcomings. Please view the attached legal analysis of the bills to understand the weight of this claim.	Your legal concerns with the proposed State Knik River Public Use Area are acknowledged, however BLM has no authority to impose a different management regime on the adjacent state lands. BLM recognizes the non-motorized use of the Knik area and has assigned the "limited" OHV classification to BLM-managed lands in the area. We intend to further define the management of the Knik area through the development of an implementation plan, which incorporates the goals (stated in Appendix F) for the Knik River SRMA. BLM is committed to working with all of the interested parties as part of its planning process.
22 - 21	Planning discussions/interaction with state officials and agencies seem to be an essential component of effective management.	Agree. Consultation will continue, along lines described in Chapter 5 of the PRMP/FEIS.
23 - 3	<p>The Matanuska-Susitna Borough adopted regulations (MSB Chapter 17.62) in October 2004 that requires a conditional use permit for any exploration and development of coalbed methane within the borough. This is separate from Federal and State regulations.</p> <p>The conditional use permit consists of two separate permits: a permit for exploration and a permit for development and production of cbm. Each permit requires a separate application, public notice, public hearing and approval by the MSB Planning Commission.</p> <p>Construction, installation and operation of coalbed methane facilities may not begin until the Planning Commission has approved the permits.</p> <p>At some point, BLM lands within the boundaries of the MSB will be open for oil & gas and coalbed methane lease and we want to be sure all parties involved, including operators within a lease, are aware of MSB regulations pertaining to this type of development.</p>	Thank you, comment acknowledged. Chapter 2, Section 2.3.2.2 addresses development of fluid leasables. The MSB regulations will be added to the plan and it will be noted these activities must be permitted by MSB prior to any activity. However, it is the ultimate responsibility of lessors and operators to comply with local regulations outside the jurisdiction of BLM responsibilities.

Coordination and Compatibility

Comment #	Comment	Response
24 - 4	Alternative D (the preferred alternative) allows for potential increased levels of resource development and extraction. The Matanuska-Susitna Borough regulates gravel extraction operations and coal bed methane exploration and development (MSB Interim Materials District & MSB 17.62); these MSB regulations should be referenced in the plan and it should be noted these activities must be permitted by the MSB prior to any exploration or development activities.	See response to comment 23-3 under Coordination and Compatibility.
24 - 6	Table 1.6-1 of the plan does not include Matanuska-Susitna Borough Plans, such as the Knik-Fairview Comprehensive Plan, Chase Comprehensive Plan, the Talkeetna Comprehensive Plan, the Houston Comprehensive Plan, the Big Lake Comprehensive Plan, the Big Lake Management Plan, the Sutton Comprehensive Plan, the South Denali Plan, or the Matanuska-Susitna Borough Comprehensive Plan.	Thank you. These plans have been added to Table 1.6-1.
24 - 7	Many communities within the Ring of Fire planning area are currently preparing comprehensive plans, such as Trapper Creek and the Y community.	Thank you, comment acknowledged.
24 - 8	In addition, Talkeetna, Nancy Lake State Recreation Area, Palmer Hay Flats Recreation Area, Denali State Park, Point MacKenzie Port, and the City of Houston also have Special Land Use Districts (See MSB Chapter 17) that regulate land uses within those areas.	Thank you, comment acknowledged.
24 - 9	Please note that the Knik-Fairview Planning Area is developing a Special Land Use District for a proposed Sled Dog & Recreation District as outlined in the Knik-Fairview Comprehensive Plan.	Thank you, comment acknowledged.

Coordination and Compatibility

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
24 - 10	While the Telecommunications Act of 1996 and the Executive Memorandum of 1996 and the Executive Memorandum of August 10, 1995 requires BLM to facilitate requests for communication sites, please note that the Matanuska-Susitna Borough regulates cell towers and such facilities require a conditional use permit (See MSB 17.69.140). Borough regulations are also being developed for other essential services and utilities.	BLM will cooperate with the Borough to insure that proponents are aware of the Borough's requirements.
24 - 12	The Matanuska-Susitna Borough fully supports working collaboratively with BLM and other interested agencies in actively pursuing planning development and enforcement strategies for the Knik River Area.	Thank you for your comment. BLM is committed to working with all interested parties as part of the planning process.
25 - 3	Permits to cross streams should be kept in place through the Department of Natural Resources as they are written now. There is no biological reason to close streams to crossings within the public use area. Data from the Alaska Department offish and Game, reveals that there is no damage to salmon populations in the Knik River drainage.	Thank you, comment acknowledged. However, the preferred alternative recommends a Special Recreation Management Area, for which more specific management measures would be developed through an implementation level plan. This plan must, according to BLM's policy, be developed with the involvement of the surrounding land owners and managers and will take into consideration all of the available resource data. As noted in Table 2.3-4 of the PRMP/FEIS, this may involve measures such as seasonal closures, closure of some portion of the SMA to OHVs, designation of trails or limitations to designated trails, and/or opening some portions of the SRMA to OHV use.
25 - 4	Regulations on federal lands that separate state lands should coincide with state regulations. Lands that are currently federal lands and selected by the state and or private corporations should remain in either the state or federal ownership. Privatization would only create elimination for users of these lands unless agreed upon by owners and users.	Coordinated and consistent management among neighboring land jurisdictions strengthens management and reduces confusion. BLM is obliged to convey lands consistent with the entitlements of the State and Native corporations. BLM attempts to be as consistent with the management of the surrounding lands in its plans. Nothing in this plan will affect BLM's obligation to satisfy these entitlements and transfer of title to the State or Native corporations.

Coordination and Compatibility

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
27 - 7	<p>Additionally, we request that BLM adopt strong protective measures for the Neacola Mountains/Chilligan River Area of Critical Environmental Concern (ACEC). This area is adjacent to both state and federally protected lands (the Trading Bay State Game Refuge and Lake Clark National Park). As we are well aware, migratory wildlife do not recognize land ownership boundaries so it is only logical that the BLM should apply conservative wildlife management provisions to the Neacola Mountains ACEC that are consistent and complimentary to those of the National Park Service and State Game Refuge.</p>	<p>Thank you, comment acknowledged. The Proposed Action would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC. The boundaries of the Neacola ACEC are based on our analysis of the scenic and other resource values of the area. Other areas were considered but not included in the proposed ACEC. BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable law. BLM will consider the management of the adjoining lands and attempt to be as consistent in our management as allowed by our policies, and any future actions will be subject to the NEPA process and the ROPs and stipulations developed for BLM lands.</p>
28 - 12	<p>WHEREAS, Palmer Hay Flats State Game Refuge lands have been designated as critical habitat for Alaska's wildlife;</p> <p>WHEREAS, Palmer Hay Flats State Game Refuge lands have been legislatively set aside as a public recreation area for all Alaskans;</p>	<p>Please see response to comment 28-1 under Special Management Areas.</p>
33 - 2	<p>We recognize the difficulty inherent in developing a land use decision-making document designed to provide overall guidance in an area where land status is in flux due to unresolved State and Native land selections. We appreciate BLM's efforts to coordinate with the State throughout the planning process. Through consistent, close coordination with the State, many potential issues have been eliminated or resolved during development of this plan.</p>	<p>Thank you for the comment. BLM seeks to minimize the potential for significant differences or changes in management approaches on selected lands, pending completion of the conveyance process.</p>
33 - 3	<p>Furthermore, BLM's efforts to coordinate proposed management strategies with those on adjacent state lands as described in state planning documents will help to create predictable management schemes for the public now, and following conveyance of selected lands.</p>	<p>Thank you, comment acknowledged. BLM seeks to minimize the potential for significant changes in management approaches of selected lands, pending completion of the conveyance process.</p>
33 - 70	<p>We appreciate the attention BLM has paid to existing State planning documents, regulations, and previously articulated concerns as well as the level of cooperation and coordination extended to the State.</p>	<p>Thank you for the comment. Under the Secretary's 4 "C's" guidance, BLM seeks to maximize cooperation, consultation, and coordination.</p>

Coordination and Compatibility

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
36 - 4	Regardless of designation, we recommend that BLM parcels adjacent to existing state or federal conservation units be managed in a manner consistent with the management of the adjacent unit. The Palmer Hay Flats units are adjacent to the Palmer Hay Flats State Game Refuge and the Iniskin River Valley is adjacent to Lake Clark National Park and Wilderness Area.	BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable law. BLM will consider the management of the adjoining lands and attempt to be as consistent in our management as allowed by our policies.
37 - 1	In the Knik please have the same rules as the state as there is no way to tell where BLM land starts and ends.	Agree with premise that coordinated, consistent management strengthens effectiveness and reduced confusion. However, BLM would have to independently develop management measures through the public process of an activity plan, coordinating closely with State managers, but guided by BLM mandates and procedures.
42 - 22	The BLM may also have opportunities to collaborate and coordinate with other agencies and with educational institutions to conduct research and monitoring of climate change on BLM-managed land within the planning area.	BLM welcomes the opportunity to leverage scarce monitoring funds through cooperative projects.
47 - 3	I am pleased that BLM recognizes the importance of working with the community in developing management plans that will preserve recreation while, very importantly, ensuring resource protection. Everyone will benefit by this approach.	Thank you, comment acknowledged.
119 - 23	At a minimum, we recommend that BLM apply to the proposed Neacola Mountains ACEC management principles consistent with the adjacent Lake Clark National Park and Preserve.	Please see response to comment 36-4 under Coordination and Compatibility.

Coordination and Compatibility

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 89	<p>We request that the Anchorage Field Office follow the example set in the Draft East Alaska RMP/EIS which proposed including selected lands within special management areas should the selections be relinquished and the lands ultimately retained in federal ownership. For example, BLM proposed this management scheme for the “eligible” South Branch of the West Fork of the Gulkana River and the Tiekel SRMA. Likewise, the proposed Neacola Mountains ACEC should include within its boundaries the adjacent block of State-selected lands along the McArthur River. This strategy would provide consistent management and prevent future enforcement problems. For example, if the State’s Generally Allowed Uses are the standard for OHV use on BLM interim-managed lands, it will be difficult for recreational OHV users to adhere to the more restrictive federal guidelines should the State relinquish its selections.</p>	See response to comment 53-2 in Special Management Areas.

End of section on Coordination and Compatibility

Cultural Resources

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
43 - 17	The Chilkoot is also an important archaeological site, being ancestral land of one local Native group and perhaps others in the past. Basic archaeological assessment was done here in 2003 with much more in-depth work yet to be done.	BLM recognizes the important cultural significance of the Chilkoot River and surrounding lands. As noted in Section 3.2.16.5 in the Proposed RMP/Final EIS, "there are approximately 4,800 cultural resource sites in the southeast region." Although not identified by location or name, culturally significant sites along the Chilkoot River are included in the count.

End of section on Cultural Resources

DOI/BLM Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 8	We request that BLM include information about the Alaska Coastal Zone Management Act of 1997 and the Alaska Coastal Management Program in the plan so that land managers as they undertake specific implementation activities are aware that certain federal actions may require a Federal Coastal Consistency Determination. Chapter 2, Section 2.0, page 2-3 may be an appropriate location for this discussion since this federal requirement will pertain to all alternatives. Attachment B contains language excerpted from other Federal land use plans that may be useful.	BLM has an obligation to coordinate applications with the State under ANILCA Section 906(k). Part of this is the coordination of applications for Coastal Zone Consistency review.
34 - 10	Because the DEIS identifies the major Haines Block planning issue as impacts of helicopter-supported recreation to goats and other wildlife, it is essential that BLM analyze the ten years of goat monitoring data gathered from the Haines Block prior to making land use planning decisions that may negatively affect an identified significant wildlife resource. Wildlife specialists acknowledge that increasing levels of helicopter-supported recreation in goat habitat "can result in a variety of negative effects, including habitat abandonment significant enough to affect population status and herd viability, dramatic changes in seasonal habitat use, increased vulnerability to predation, alarm response, decreased bouts of foraging and resting, increased animal movement and energy expenditure, and reduced productivity." See 2004 Northern Wild Sheep and Goat Council ("NWSGC") Position Statement. This professional organization of wildlife biologists, researchers and veterinarians based its Statement on "the best available knowledge." Id. However, this "best available knowledge" is contradicted by the DEIS conclusion that there would be "continued minimal adverse effects from recreation activities" on goat populations. See DEIS at 4-148. That is, negative effects that decrease herd viability can hardly be termed "minimal". It is inappropriate for the DEIS to make that conclusion before analyzing the very data that would determine whether or not this is indeed the case. BLM is required to "document sufficient analysis to support all conclusions." See BLM Land Use Planning Handbook H-1601-1 ("Handbook") Appendix F at 17. There is no documented basis for this conclusion of "minimal adverse effects," particularly when "the best available knowledge" indicates this conclusion is erroneous.	Please see responses to comments 34-11 under DOI/BLM Compliance and 119-57 under Wildlife. Text in Section 4.4.3.4.3 has been changed to indicate that "there would be continued adverse effects of a currently unspecified magnitude from recreation activities."

DOI/BLM Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
34 - 11	<p>The importance of having good data is recognized in the Handbook: "The BLM must analyze available inventory data and other information." See Handbook at 19. This information is used as "the basis for formulating reasonable alternatives." Id at 20. Without this information BLM planners have no idea whether all goat populations are healthy, or whether there are differences between populations in the M&C Area and populations that receive varying levels of helicopter disturbance within the Haines Block. Once compiled, this data would help articulate the "physical and biological processes that affect ecosystem function...and the relative value and scarcity of the resources," as mandated in the BLM handbook. See Handbook at 20. That is, decision-makers would learn about the relative health of goat populations under various levels of helicopter intrusion, and various seasonal habitat use patterns. Inferences could be made about the health of known goat predators such as black and brown bear, wolverine and bald eagles. The effectiveness and adequacy of current mitigation requirements could also be determined.</p>	<p>BLM agrees with the stated comments. The mountain goat inventory data is being analyzed along with other available information, and will be utilized in the preparation of the Haines Block SRMA implementation plan. When compiled and analyzed, the assessment will be made available as a published report.</p>
34 - 12	<p>Additionally this data would not only supply the critical missing information about the current status of goat populations, but also could be used to predict changes in goat and goat predator resources should the current management continue, as required by the Handbook. See Handbook Appendix F at 8. In fact, "a successful land use planning effort always employs rigorous standards for maintaining, managing, and applying data and derived information. Standardized, accurate, and reliable data and information are critical to the development of plan assessments, alternatives, impact analysis, and planning decisions." See Handbook Appendix G at 1.</p>	<p>Please see responses to comments 34-10 and 34-27 under DOI/BLM Compliance.</p>

DOI/BLM Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
34 - 27	<p>"Consider the relative scarcity of the values involved." Id. We made the case in our 2004 ACEC/RNA nomination that the majority of naturally occurring mountain goats on BLM lands nationwide are located in the Haines Block. See LCC 2004 nomination. This scarce BLM resource is put at risk by helicopter-supported recreation. See 2004 ADFG scoping comments and NWSGC Position Statement.</p>	<p>BLM does consider the relative scarcity of resources in an area. This is one of the reasons for the proposed Haines Block SRMA (Figure 2.3-4 and Appendix F of the Proposed RMP/Final EIS). While an ACEC/RNA designation would have some protection function, it is not a viable option at this time. However, a SRMA designation and associated future implementation planning as proposed in the Proposed RMP/Final EIS, would beneficially affect mountain goat populations in the area.</p> <p>BLM considered the nomination of the Haines Block as an ACEC and the remaining lands as an RNA but did not assign those designations in the Draft RMP/EIS. The lands in the Haines Block containing Special Recreation Permits are being designated as a Special Recreation management Area. The subsequent implementation plan for the area will address the effected resources, including mountain goats. Large portions of the lands surrounding Haines have been selected by the State of Alaska and appear on their priority list for 2006. Title to these lands will be transferred by BLM. Although BLM has gathered data over a 11 year period, there are no proposals to study the resources by anyone outside the BLM.</p>
45 - 4	<p>Further, we understand from LCC that it is their belief that BLM's policies and regulations require BLM to make public such requests as part of the planning process and we trust BLM will now provide a means for the public to comment on LCC's ACEC proposal.</p>	<p>This ACEC proposal was not brought forward in the Draft RMP/EIS planning process (see Chapter 2, Section 2.2). The public will have an opportunity to comment on ACECs or SRMAs that are designated as a result of this PRMP/FEIS during the implementation level planning phase.</p>
79 - 8	<p>I have personally witnessed the impacts of a few unethical tour operators on natural and cultural resources. Until the business community can comply with a set of systematic and ethical guidelines, it is wise to limit the locations and types of such activities.</p>	<p>Thank you, comment acknowledged.</p>

DOI/BLM Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
113 - 18	Unfortunately, we are concerned that a de facto suitability analysis has already been completed since Alternatives A, B and D completely fail to account for the possibility that some or all of the eligible Wild and Scenic rivers would ultimately be determined suitable. The Draft RMP even fails to list interim protection measures that would be taken under these Alternatives. Such a de facto decision defies the intent of BLM Manual 8351, which clearly lays out a process for the careful and fully informed analysis of suitability through the planning NEPA process.	Please see response to comment 113-3 under Wild and Scenic Rivers.
119 - 5	This planning process is an opportunity for BLM to fulfill its duty of responsible land stewardship by establishing management goals and desired future natural resource conditions above and beyond maintaining the status quo.	Thank you, comment acknowledged.
119 - 24	In this Draft RMP/EIS, BLM's analysis of the eligibility of rivers and river segments in the planning area for Wild and Scenic designation was inadequate. As discussed below, its analysis flouted its legal mandates pursuant to the Wild and Scenic Rivers Act (WSRA) and NEPA. It also ignored internal agency guidance on conducting WSRA evaluations. Thus, we request that BLM prepare a Revised Draft RMP/EIS that address the various omissions and inconsistencies discussed herein so that the public will have an opportunity to review and comment on this information before a Final RMP/EIS is issued.	BLM disagrees with this comment. Please review the text in Section 2.2 in the Proposed RMP/Final EIS, Alternatives Considered But Not Further Analyzed, as well as the response to comments 113-3 under Wild and Scenic Rivers.
119 - 28	Moreover, pursuant to NEPA, the Interagency Guidelines, and Appendix C of BLM's Land Use Planning Handbook, BLM must include, and fully analyze, a reasonable range of alternatives for the use of these river areas. The Draft RMP/EIS improperly proposed three alternatives that failed to recommend a single river for designation and recommended fourteen rivers in the remaining alternative. To provide a reasonable range of alternatives, BLM must propose alternatives that range from designating all eligible rivers to designating no river, and in the other alternatives propose designations in a range somewhere between these two extremes.	Please see responses to comments 113-3 and 113-20 under Wild and Scenic Rivers.

DOI/BLM Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 30	BLM Manual 8351 sets forth thirteen suitability criteria. In direct contravention of this guidance, for each of the fourteen rivers recommended in Alternative C, BLM provided no discussion of (a) the reasonably foreseeable potential uses of the land and related potential uses of the land which would be enhanced or foreclosed by designation; (b) the degree to which State or local governments might participate in the preservation and administration of the river; (c) public support or opposition to designation under the WSRA; (d) the estimated cost to the United States of designation and administration, or any of the other criteria the Manual requires. Thus, BLM must issue a Revised Draft RMP/EIS that includes discussion of all of the suitability criteria for each eligible river.	Relevant suitability criteria and the rivers that are considered eligible in this planning process are discussed in Section 3.4.1.3.
119 - 55	According to the BLM Land Use Planning Handbook (LUP Handbook), "The BLM must analyze available inventory data and other information." See LUP Handbook at 19. BLM is to use this information to provide "the basis for formulating reasonable alternatives." Id. at 20.	See response to 34-11 under DOI/BLM Compliance.
119 - 101	The Final RMP/EIS also must clarify and provide a detailed explanation of how the BLM may tier off the document for future decisionmaking on resource development or other activities that may damage resources or resource values.	A complete NEPA analysis is required for all proposed projects within the Ring of Fire planning area.
119 - 119	BLM also should clarify two other assertions it made in the Draft RMP/EIS. BLM stated that it will continue to "provide detailed mineral assessment of specific areas." BLM should provide a citation for the source of its authority to conduct such an assessment.	ANILCA Section 1010, Alaska Mineral Resource Assessment Act (P.L. 96-487, 16 U.S.C. 3150) provides the authority for these assessments.
119 - 127	BLM should wait for Congress to revise the 1872 General Mining Law before proceeding with opening public lands to mineral entry. In the meantime, BLM should identify area-wide terms, conditions, and special considerations that would protect natural resource values.	As part of the planning process required by BLM, we have to look and deal with the issues that confront us today, not what may or may not happen in the future. The rules that BLM are required to follow for Locatable Minerals are the 1872 General Mining Laws and 3809 regulations.

End of section on DOI/BLM Compliance

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 14	<p>1.2 Description of Planning Area We suggest adding a clarifying statement following "Because of over selection, BLM will ultimately retain management of some of the selected lands." However, nothing in this plan will encumber state or native selected lands prior to conveyance</p>	The following text has been added to Section 1.2, page 1-1 of the Proposed RMP/Final EIS: "However, nothing in this plan will encumber State- or Native-selected lands following transfer of the title out of Federal ownership."
33 - 15	<p>1.3.2 Issues Considered But Not Further Analyzed, Page 1-6, Consider wilderness designations. Please edit the last sentence to read as follows: "In accordance with all of the above, wilderness inventory is not being conducted as part of this planning effort and wilderness areas designations are not considered in any of the alternatives."</p>	The last sentence on page 1-6 in Section 1.3.2 of the PRMP/FEIS has been edited to read, "In accordance with all of the above, wilderness inventory is not being conducted as part of this planning effort, and wilderness areas designations are not considered in any of the alternatives."
33 - 16	<p>We suggest that a sentence be included in paragraph 3 of the introductory section on the alternatives on page 2-1 that further explains the tenure of RMP decisions on state and native selected lands. It would be helpful to explain that Special Management Designations neither encumber state or native selected lands, nor do they carry forward following conveyance.</p>	The following text has been added to Section 2.0, page 2-1, paragraph 3 of the Proposed RMP/Final EIS: "Special Management Designations on State- or Native- selected lands do not carry forward following conveyance of the lands."
33 - 17	<p>2.1.3 Alternative C We suggest modifying the second sentence (page 2-3) as follows: "One ACE and two SRMAs would be established should these lands remain in long term ELM ownership, plans developed for the areas, and specific measures adopted; to protect or enhance values within these areas."</p>	The third sentence in Section 2.1.3, page 2-3 of the Proposed RMP/Final EIS has been modified: "One ACEC and two SRMAs would be established if these lands remain in long-term BLM ownership, plans would be developed for the areas, and specific measures would be adopted to protect or enhance values within these areas."
33 - 18	<p>2.1.4 Alternative D We suggest modifying the third sentence (page 2-4) as follows: "One ACE and two SRMAs would be established should these lands remain in long term ELM ownership, plans developed for the areas, and specific measures adopted to protect or enhance values within these areas "</p>	The second sentence in Section 2.1.4, page 2-4 of the Proposed RMP/Final EIS has been modified: "One ACEC and two SRMAs would be established if these lands remain in long-term BLM ownership, plans would be developed for the areas, and specific measures would be adopted to protect or enhance values within these areas."

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 23	2.4.1 Fisheries~ Page 2-27, Objectives, 2nd paragraph. For reference, we request the Bureau include a copy of the Master Memorandum of Understanding between the Bureau and the Alaska Department of Fish and Game in the Appendix of the final plan.	A copy of this document is included in the Proposed RMP/Final EIS as Appendix K.
33 - 27	Please edit the first word in bullet number 5 to read "Suppress..." (page 2-36)	"Suppressed" has been changed to "Suppress" in the Proposed RMP/Final EIS.
33 - 28	Table 2.7-1 Summary and Comparison of Effects on Resources by Alternative (p. 2-56) Please modify the sentence "Future planning associated with the SMAs or VRM classifications proposed under this alternative could result in additional restrictions for mineral development within those areas" to indicate that future planning will also involve a public comment period. We suggest: "Future planning associated with the SMAs or VRM classifications proposed under this alternative could result in additional restrictions for mineral development within those areas after a period of public review and comment."	"after a period of public review and comment" has been added to this sentence in the Proposed RMP/Final EIS.
33 - 30	3.2.8.5 Other Aquatic Habitats Page 3-51 Critical Habitat Areas. We recommend the Bureau separate this section into two parts, State Critical Habitat Areas and National Wildlife Refuges. Both areas are exclusive of one another and have differing statutory and administrative purposes.	An additional subheading, National Wildlife Refuges, has been added to Section 3.2.8.5 of the Proposed RMP/Final EIS.
33 - 31	Page 3-52, Critical Habitat Areas, 1st full paragraph. Kenai National Wildlife Refuge may have wildlife-dependent recreation as a purpose of the refuge, but all refuges have this purpose under the Refuge Improvement Act of 1997.	Thank you, comment acknowledged.
33 - 32	Page 3-52, Critical Habitat Areas. We recommend combining the two paragraphs describing Kodiak National Wildlife Refuge into a single paragraph.	This change has been made in Section 3.2.8.5 of the Proposed RMP/Final EIS.

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 33	<p>Page 3-52, Critical Habitat Areas, last paragraph. Is the 65% of total commercial harvest cited in the text referring to the value of fish or the quantity of fish?</p>	Section 3.2.8.5, page 3-52 of the Proposed RMP/Final EIS has been edited to clarify that the percentage is the quantity, not the value, of fish.
33 - 34	<p>3.2.9 Wildlife, Page 3-57, Wildlife, Southeast Region, 4th paragraph, and other similar language elsewhere in the text.</p> <p>We request the Bureau clarify in the text that they manage 12 miles of the Tsirku River uplands, not the actual river itself.</p>	BLM manages the upland portion along 12 miles of the Tsirku River. This clarification has been made in Sections 3.2.4, 3.2.9.1, and 3.2.16.5 of the Proposed RMP/Final EIS.
33 - 35	<p>3.3.4 Lands and Realty, Page 3-131, Lands and Realty, 4th bullet (ANILCA)</p> <p>It is more accurate to state that the Alaska National Interest Lands Conservation Act (ANILCA) (1980) established and redesignated National Parks and Preserves, National Wildlife Refuges, National Conservation and Recreation Areas, Wild and Scenic Rivers, National Monuments, and wilderness areas on federal lands in Alaska.</p>	The 4th bullet of Section 3.3.4 in the Proposed RMP/Final EIS has been edited to read, "Alaska National Interest Lands Conservation Act (ANILCA) (1980) established and redesignated National Parks and Preserves, National Wildlife Refuges, National Conservation and Recreation Areas, Wild and Scenic Rivers, National Monuments, and wilderness areas on federal lands in Alaska."
33 - 37	<p>3.3.10 Off-Highway Vehicles, page 3-165</p> <p>Please modify the second sentence in the fourth paragraph to reflect the fact that vehicles in Chugach State Park are allowed on established parking areas and roads as described in 11 AAC 12.020(g.) Vehicle Control. Snow vehicles are allowed on park lands during times when there is adequate snow cover to protect underlying vegetation as described in 11 AAC 20.040 Snow Vehicles.</p>	Where applicable, text throughout the Proposed RMP/Final EIS incorporates the clarification that vehicles in Chugach State Park are allowed on established parking areas and roads as described in 11 AAC 12.020(g), and that snow vehicles are permitted in designated areas when enough snow is on the ground to protect underlying vegetation (11 AAC 20.040).
33 - 38	<p>3.3.10.2 Off Highway Vehicle Management Page 3-167, Kodiak Region.</p> <p>There are several inaccuracies in this paragraph describing designated wilderness and off- highway vehicle management on the Kodiak National Wildlife Refuge. We request the Bureau revise this paragraph for the final plan.</p>	The following text is included in Section 3.3.10.2 of the Proposed RMP/Final EIS, replacing the Draft RMP/EIS text for the Kodiak Region: "The majority of Kodiak Island is comprised of the Kodiak NWR (Figure 1.2-2); however, there are small, scattered parcels of BLM land spread throughout the island. Within the refuge boundaries, OHV use is allowed on designated routes or areas by special use permit (USFWS 2004e). This would include OHV use on small parcels of BLM-managed lands that fall within the refuge boundaries. Outside the Kodiak NWR boundaries, the highest potential for OHV use on lands south of the City of Kodiak along the road network."

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 39	<p>3.3.11 Recreation.1 Page 3-169.1 6th paragraph (and elsewhere in the document).</p> <p>We request the Bureau revise the text in this paragraph and elsewhere in the document from "sport hunting" to just "hunting." The State subsistence law currently includes all residents as subsistence users in areas where subsistence uses are authorized in State regulation. Federal agencies frequently mischaracterize hunters who are not federally qualified subsistence users to be "sport hunters." Non-federally qualified subsistence users often qualify as subsistence users under the State regulations. It is also important to clarify that State regulations only classify hunters as being "resident" or "non-resident" hunters.</p>	"Sport hunting" has been changed to "hunting" in the Proposed RMP/Final EIS.
33 - 40	<p>3.4.1.4 Wilderness Study Areas, Page 3-175.</p> <p>We request the Bureau include a citation in this section referring back to page 1-6 of the plan regarding wilderness study proposals.</p>	The following text has been added prior to the last sentence of Section 3.4.1.4 of the Proposed RMP/Final EIS: "Also, as discussed in Section 1.3.2, broad support from elected state and federal officials is required before BLM can consider WSA designations in resource management planning efforts, and the State of Alaska has identified no such support.
33 - 41	<p>3.5.6 Subsistence.1 Page 3-200, Definitions of Subsistence.</p> <p>We recommend the Bureau move the second sentence in the second paragraph, "State regulations continue to apply statewide to all subsistence activities unless otherwise superseded by federal regulations" to the first paragraph. In its present location, this sentence appears to apply only to subsistence fisheries and is therefore misleading.</p> <p>The third paragraph of this section notes that the statutory definition of subsistence uses incorrectly references the rural priority that no longer exists in state law. The final sentence in this paragraph, "The state does recognize preferential allocation of resource harvest opportunities for rural or non-rural (e.g., sport, subsistence, urban or rural) user groups where uses are allowed," is incorrect. The state regulations do not distinguish between user groups based on their rural or urban residence in Alaska. All Alaska residents qualify as subsistence users in areas of the state where subsistence uses are authorized.</p>	The first three paragraphs of Section 3.5.6.2 in the Proposed RMP/Final EIS have been revised to eliminate confusing text and to present a corrected discussion of the actual state legal framework.

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 43	<p>4.3.1.2.3 Alternatives for Soils, Water Resources.</p> <p>Off Highway Vehicles Effects on Soils and Water Resources, Please see pages 4-14, 15, 17, 19,23,25,27, etc.</p> <p>Scattered throughout Chapter 4 are numerous statements that contain the phrase "...except for the OHV closures at Campbell Tract and on the BLM parcels located within Chugach State Park." Please note that limited OHV use is allowed within Chugach State Park as described in 11 AAC 20.015 and that snow machine use is allowed in certain areas under certain conditions (11 AAC 20.040). Please consider as an alternative: "...except for the OHV closures at Campbell Tract and restrictions on OHV use on BLM parcels located within Chugach State Park (11 AAC 20..015 and 11 AAC 20.040)." Citations are attached.</p>	<p>Chapter 4, particularly Section 4.3, of the Proposed RMP/Final EIS has been edited to include this change. Applicable text now reads, "...except for the OHV closures at Campbell Tract and restrictions on OHV use on BLM parcels located within Chugach State Park (11 AAC 20.015 and 11 AAC 20.040)."</p>
33 - 44	<p>4.3.1.4 Fisheries and Aquatic Habitat</p> <p>Page 4-34, Wild and Scenic Rivers Effects on Fisheries and Aquatic Habitat, 2nd paragraph (and elsewhere in the text).</p> <p>It is not accurate to state that Wild Rivers typically do not allow motorized use. In Alaska, the Bureau's management of Wild and Scenic Rivers applies only to uplands and restrictions on public uses are subject to the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) and Interior regulations at 43 CFR Part 36. The State of Alaska manages the rivers. In November 1982, the Alaska Land Use Council approved "A Synopsis for Guiding Management of Wild, Scenic, and Recreational Rivers in Alaska" (attached). We suggest the Bureau revise the sentence to the following:</p> <p>Wild Rivers would allow unobtrusive development and activities consistent with the Department of Interior's 43 CFR Part 36 regulations and the Wild and Scenic River guidelines adopted by the Alaska Land Use Council.</p>	<p>While Wild Rivers generally do not allow motorized use, in Alaska ANILCA provisions would generally allow traditional means of access. The sentence has been revised in the Proposed RMP/Final EIS.</p>
33 - 46	<p>Page 4-54, Off Highway Vehicles Effects on Vegetation (Alternative D)</p> <p>Please see earlier comments relative to OHV closures in Chugach State Park.</p>	<p>Where applicable, including in Section 4.3.1.6.5, text in the Proposed RMP/Final EIS incorporates the clarification that limited OHV use is permitted in Chugach State Park (11 AAC 20.015), and that snow vehicles are permitted in designated areas when enough snow is on the ground to protect underlying vegetation (11 AAC 20.040).</p>

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 47	Page 4-57, Off Highway Vehicles Effects on Wetland-Riparian (Alternative A) Please see earlier comments relative to OHV closures in Chugach State Park and the desirability of citing applicable peer-reviewed studies relative to OHV damage.	Where applicable, including in Section 4.3.1.7.2, text throughout the Proposed RMP/Final EIS incorporates the clarification that limited OHV use is permitted in Chugach State Park (11 AAC 20.015), and that snow vehicles are permitted in designated areas when enough snow is on the ground to protect underlying vegetation (11 AAC 20.040).
33 - 48	Page 4-61, Off Highway Vehicles Effect on Wetlands-Riparian (Alternative D) Please see earlier comments relative to OHV closures in Chugach State Park.	Please see response to comment 33-47 under Edits Requested. Edits have been made in Section 4.3.1.7.5.
33 - 49	Page 4-65, Off Highway Vehicles Effect on Wetlands-Riparian (Alternative A) Please see earlier comments relative to OHV closures in Chugach State Park and the desirability of citing applicable peer-reviewed studies relative to OHV damage.	Please see response to comment 33-47 under Edits Requested. Edits have been made in Section 4.3.1.8.2.
33 - 50	Page 4-67,4-69, Off Highway Vehicles Effect on Wetlands-Riparian (Alternative C&D) Please see earlier comments relative to OHV closures in Chugach State Park.	Please see response to comment 33-47 under Edits Requested. Edits have been made in Sections 4.3.1.8.4 and 4.3.1.8.5.
33 - 51	Pages 4-90, 91, Lands and Realty We suggest checking references to Tables. Some of these references appear to be improperly numbered. As an example on page 91, the reference to fluid mineral leasing (see Table 2.3-3) we believe should be Table 2.3-2.	The Proposed RMP/Final EIS provides corrected references to tables.
33 - 52	Page 4-123, Subsistence, Direct and Indirect Effects Common to All Alternatives for Subsistence. The first sentence in the first paragraph of this section is confusing. It is unclear what point the authors are trying to make and we request they revise the sentence to clarify its intent.	The first paragraph of Section 4.3.4.2.1 of the Proposed RMP/Final EIS has been revised to clarify confusing text.

Edits Requested

Comment #	Comment	Response
33 - 53	<p>Page 4-182, Subsistence, Past and Present Effects for Subsistence.</p> <p>The last sentence in the first paragraph states that "Tyonek residents use the Neacola Mountains for federally-managed subsistence harvests of mountain goats, sheep, and other resources." We are unaware of any source for this information and the text does not cite where a reader can find this information. A Division of Subsistence technical report describing subsistence uses in Tyonek does not indicate any harvest or use of goats and sheep by community residents during the period 1978-1984 (Fall et al, 1984, cited on page 3- 221 of the draft plan). In addition, the discussion of subsistence uses in this plan (page 3- 221) also does not provide any evidence supporting the assertion that Tyonek residents harvest goats and sheep in the Neacola Mountains. More importantly, there is no federal subsistence priority for goats or sheep in Game Management Unit 16B, which includes the portion of the Neacola Mountains most accessible to Tyonek residents. We request the Bureau revise this section by either citing the source for this information or removing the information from the plan.</p>	<p>Tyonek residents had a historic use pattern of hunting sheep and caribou in the Neacola Mountains, but this practice ended by the 1940s, as moose became more readily available closer to the village. Since the paragraph refers to contemporary and continuing uses, the portion concerning Tyonek uses in the Neacola Mountains has been deleted from Section 4.4.6.2.1 in the Proposed RMP/Final EIS.</p>
33 - 54	<p>The third paragraph in this section discusses the "wealth imbalance between urban dwellers and rural people" as a factor affecting subsistence users in the south central region. Referring back to the list of communities in the south central region presented in Table 3.5- 25 (page 3-214), it is unclear which rural communities are being impacted by this wealth imbalance. It is also unclear what extent BLM lands are affected or involved, since the plan says unencumbered BLM lands in the south central region "represent a small portion of lands available for subsistence harvests, and subsistence users are not likely to utilize much of these lands for subsistence harvests because they are inhospitable or inaccessible" (page 3-220). We agree that a wealth imbalance between urban and rural residents is one factor that affects subsistence users and uses, but the authors do not make the case that this is a key factor involving BLM lands in the planning area.</p>	<p>Taken at a regional level, population growth and differential financial capacity to purchase and operate highly efficient transportation technologies is contributing to competition for resources and potential displacement of subsistence users. However, the major blocks of BLM- managed land in southcentral are too remote from communities to be affected. The Knik River parcel is affected by this trend and is encompassed within the subsistence use areas displayed in Figure 3.5-3 of the Proposed RMP/Final EIS. However, this land has been selected by an ANCSA corporation, and so is not subject to the Federal subsistence priority. The third paragraph of Section 4.4.6.2.1 of the Proposed RMP/Final EIS has been rewritten accordingly.</p>

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 58	<p>Exceptions, Modifications, and Waivers, page D-I (paragraph 2).</p> <p>The introductory section addressing exceptions, modifications, and waivers, states that the first requirement is that "the circumstances or relative resource values in the area had changed following issuance of the lease." The State is concerned that a lease stipulation may be attached to a lease but the stipulation may not be appropriate for the entire lease area. An exception may be warranted because the specific area of activity does not justify the stipulation. As currently written, however, an exception could not be granted without demonstrating that something has changed.</p> <p>The exceptions themselves, included with each stipulation, are written in such away that this first requirement is inconsistent. For example, Stipulation 2 allows exceptions, if a specific area is not actually used by moose, which has nothing to do with changed circumstances. Therefore, the State recommends that the first requirement for granting an exception be deleted, or established as a separate independent justification for granting an exception.</p>	Thank you, comment acknowledged.
33 - 64	<p>Appendix F, Proposed Special Management Area Objectives. We suggest that an introductory paragraph be created that explains how these objectives will contribute to the development of an Integrated Activity Plan for each SMA and how that planning process will take place and under what conditions. This would also be an appropriate location to further clarify that Special Management Areas will not encumber either state or native selected lands and further planning processes are unlikely to take place until selections are adjudicated.</p>	Appendix F in the Proposed RMP/Final EIS has been revised to provide an overview of the proposed Knik River and Haines Block SRMAs and the Neacola Mountains ACEC.

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 65	<p>We find the Goals and Objectives for the proposed Special Management Areas to be reasonable and designed to provide for flexibility in the development of subsequent Integrated Activity Plans. However, we request that BLM consider revising the 2. Haines Block Special Recreation Management Area Goals and Objectives as follows:</p> <p>Insert new Goal 2. b. iii iii. Improve surface access by cooperating with the State of Alaska in the location and use of a Transportation and Utility Corridor(s) between Haines and Skagway.</p> <p>Insert new Objective 2. c. v. and renumber the current 2.c.v to 2.c.vi. v. Expand recreational opportunities through construction of an access road into the easternmost portion of the block (along the west side of Taiya Inlet).</p>	Appendix F of the Proposed RMP/Final EIS does not include these changes. BLM believes these goals are outside the limits of benefit to the SRMA and are best addressed as part of the transportation plan proposals.
33 - 67	In order to make this section easier to read for people who may skip directly to the appendix, it may be helpful to insert the two maps depicting the proposed special management areas or include a page specific reference to those maps and tables in a paragraph for each SMA.	Thank you. Edits have been made in Appendix F.
41 - 5	The DRMPEIS on page ES-iii makes the following statement under Alternative B "Nearly all unselected...would be relinquished or rejected." This statement is not correct. Nothing in any planning process can in any way affect the Native and State selections or the rights that have been granted to the Native people or the State of Alaska. We suggest rewording to "...would be relinquished by the State or Native selector."	Agreed. The wording has been changed to read "...would be relinquished by the State or Native selector."
41 - 14	a. Pg. G 45-G46 -Mark Peterson, Metallica Resources, reported on 2005 exploration activities by Full Metal Minerals, Ltd. on the Alaska Peninsula at the November 2005 Alaska Miners Association Conference. Work was conducted at a number of deposits mostly located on Native lands (e.g. Mallard Duck, San Diego Bay, Apollo, and Shumagin).	Minerals information obtained for the Draft RMP/EIS only included Alaska Mineral Industry 2003 published data from the State of Alaska. The RFD was written in early 2005, so information reported at the AMA convention in 2005 would not have been available to include in the report, or used in the analysis. Activities occurring on Native lands would have a minimal (if any) effect on BLM unencumbered lands in the Alaska Peninsula region.

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
41 - 15	<p>b. Pg.G 48 -Two U.S. Bureau of Mines reports published in 1986 and 1987 provide significant additional information concerning mineral resources in the Hope/Girdwood/Summit Lake/Moose Pass areas of the Kenai Peninsula in the Chugach National Forest. Estimated placer production from the mid 1890's through 1982 was nearly 134,000 ounces and this fact should be included in the document. Also, resource estimates for several lode gold deposits in those areas were made based upon sampling and mapping of accessible workings. These reports are:</p> <p>i. Hoekzema, R.B. and S.A. Fechner. 1986. Placer Gold Sampling in and Near the Chugach National Forest, Alaska. BOM IC 9091. 42 pp.</p> <p>ii. Hoekzema, R.B., S.A. Fechner, and J.M. Kurtak. 1987. Evaluation of Selected Lode Gold Deposits in the Chugach National Forest, Alaska. BOM IC 9113. 62pp.</p>	Lands within the Chugach National Forest are outside the jurisdiction of the BLM. BLM interacts with the USFS where a request for validity or patent application has been received. BLM is required to sign the "Mineral Examination Report" by a certified BLM Mineral Examiner. The Ring of Fire analysis mentioned the deposits within the area of concern, but only included them as examples of active mineral operations within the planning area boundary. Activities occurring on USFS lands would have a minimal (if any) effect on BLM unencumbered lands in the Kenai Peninsula.
41 - 16	c. Pg. G 56 -RFD needs to be defined (Reasonable Foreseeable Development Scenario?).	Appendix G in the Proposed RMP/Final EIS has been revised to incorporate the appropriate use of "RFD" and "RFD scenario." RFD is the acronym for "Reasonably Foreseeable Development." Attachments A and B present the RFD scenarios developed by BLM to project RFD for oil and gas resources and for locatable and salable minerals in the Ring of Fire planning area.
41 - 17	d. Pg. G 58 -Bob Stiles updated the progress of the Chuitna Coal project at the AMA November 2005 conference and again at the December 8th, 2005 RDC breakfast. He indicated that the intent is to begin construction as soon as 2007 or 2008 on the port facility and access road to the minesite.	Minerals information obtained for the Draft RMP/EIS only included Alaska Mineral Industry 2003 published data from the State of Alaska. The RFD was written in early 2005, so information reported at the AMA convention in 2005 would not have been available to include in the report, or used in the analysis. Activities occurring on State, Native, or private lands would have a minimal (if any) effect on BLM unencumbered lands in the area of the proposed coal project. There are no BLM unencumbered lands in the area, nor along the transportation corridors.

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
41 - 18	e. Pg. G 60 (1st paragraph) -Metal prices have all increased significantly since this appendix was written. Gold is currently (December 2005) selling at or above \$500/oz. If metals prices continue to increase or stay at current levels additional mining activity could result.	Section 4.2.1 of Appendix G in the Proposed RMP/Final EIS has been revised. Minerals information obtained for the Draft RMP/EIS only included Alaska Mineral Industry 2003 published data from the State of Alaska. The RFD was written in early 2005, so rising metal prices were not included in the analysis. As part of the RFD, numerous assumptions are made. It is assumed that metal prices fluctuate and this has been taken into consideration in developing the alternatives. It must be remembered that mineral exploration and development occurs over a long period of time, and numerous forces that are beyond our control have a large effect on the mineral industry; factors which were included in the analysis.
41 - 20	g. Pg. G 61-Alaska Peninsula/Aleutian Chain Region - "Development potential is generally expected to be low..." It must be clarified that this statement refers to development potential on BLM managed lands only and that BLM lands make up only a small portion of the district.	The second paragraph of Section 4.2.3 of Appendix G in the Proposed RMP/Final EIS has been revised to make this clarification.
41 - 21	h. Pg. G 66 Bibliography -This document is not complete. At a minimum, all reports now found in the ARDF (Alaska Resource Data Files) maintained by the USGS should be listed.	Although updated, the bibliography for Appendix G in the Proposed RMP/Final EIS does not include a complete listing of all reports in the ARDF. The bibliography presents only those documents used by the author in writing the appendix.
41 - 22	a. Pg. B-I last sentence -"However, ...the Neocola Mtn..., could remain closed to mineral entry." The AMA supports opening this area to potential exploration and development. Alternative Summary Table 2.6.1 does not indicate that the Neocola Mtn. area would be closed to mineral entry. ACECs do not close lands to mineral entry. This fact must be made known and this apparent contradiction needs to be clarified.	Agreed. ACECs do not preclude mineral entry, they only advise closer scrutiny and tighter restrictions through ROPs and/or Stipulations.

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
41 - 23	b. Pg. B3-2 -Alaska Peninsula/Aleutian Chain Area -The statement "No current exploration activity is occurring..." is incorrect. It may be true that there are few if any active federal mining claims but that may change. There is very active exploration on the lands in the area, both on State and Native and Native selected lands. Alaska Earth Sciences, Full Metal Minerals, Ltd. and Metallica, Ltd. are all actively exploring several prospects on the Alaska Peninsula. Exploration increased significantly in 2005 and it is expected to increase even more in 2006.	Minerals information obtained for the Draft RMP/EIS only included Alaska Mineral Industry 2003 published data from the State of Alaska. The RFD was written in early 2005, so information reported or published after that time would not have been available to include in the report or used in the analysis. Activities occurring on State or Native lands would have a minimal (if any) effect on BLM unencumbered lands in the Alaska Peninsula region. Activities occurring on Native-selected land could have an effect, but the effect would be minimal as well. Native-selected lands are closed to mineral entry until such time that the lands are conveyed to the Native corporation. Thus, mineral activity would need to be restricted to pre-existing active federal mining claims. Native-selected lands within the identified High Mineral Potential areas would most likely be rated "high priority" for conveyance.
41 - 25	c. Pg. B3-2 -Southcentral Region -Full Metal Minerals, Ltd. Is conducting advanced exploration work at the Lucky Shot Mine near Hatcher Pass. Also, various others continue to prospect and sample several of the lode gold prospects in the Hope/Moose Pass area on the Kenai Peninsula. These properties are located on Federal claims managed by the Chugach National Forest.	There are active mining claims in the area, however they are located on State lands. Effects to BLM unencumbered land would be minimal if any mineral activity were to occur. BLM would be involved in the Plan of Operations, and would work closely with the State during the review and permitting process. Also see response to comment 41-15 under Edits Requested.
41 - 26	d. Pg. B 4-1 -Table 2 -There is no reference to several notable lode gold prospects in the Hope and Summit Lake areas of the Kenai Peninsula. Prospects with identified resources (see IC9113) such as the Nearhouse, Gilpatrick, Heaston- Oracle, Hirshey-Lucky Strike, and Gilpatrick Dike prospects should be included on this table.	Please see response to comment 41-15 under Edits Requested addressing Chugach National Forest concerns.
41 - 27	e. Pg.B4-1 -4.1.2- Southcentral Region- Add the underlined: "No current lode development on BLM managed lands." As mentioned previously, this statement is not correct and there is advanced exploration/development work at the Lucky Shot Mine.	The Lucky Shot Mine is located on USFS land. See response to comment 41-15 under Edits Requested addressing Chugach National Forest concerns.

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
41 - 28	f. Pg. B4-1 -4.1.3- Southcentral Region: "Three small placer ..." Small scale placer mining was also conducted on federal mining claims owned by the Hope Mining Company on Resurrection Creek near Hope.	The Resurrection Creek area is located on USFS land. See response to comment 41-15 under Edits Requested addressing Chugach National Forest concerns.
41 - 29	g.0 Pg. B4.1 -4.1.3- Southeast Region -"The Greens Creek Mine was the only. ..." This is not correct. There continues to be some placer gold production from claims in the Porcupine Creek district area near Haines.	Information received from BLM District Office personnel indicated that no permitted mineral activities were occurring on the active federal mining claims in the Porcupine Creek area. BLM would be involved in the Plan of Operations, and would work closely with the State during the review and permitting process. This area contains no BLM unencumbered lands.
41 - 30	h. Pg. B7.1-7.0 RFD Baseline Development Scenario -We understand that the scenarios discussed apply only to the development located on unencumbered BLM lands and State and Native selected lands which have not yet been conveyed. We recognize that development may be limited because of the time to explore and permit projects. However, these lands have been encumbered and restricted for several decades and as a result modern exploration techniques have not been applied to the area. If major deposits are identified, development could move ahead rapidly. It must be noted that metal prices are currently (December 2005) at high levels with gold at or above \$500/oz and copper at or above \$2.00/lb. Such prices will result in new exploration in nearly every district.	Please see response to comment 41-18 under Edits Requested. Until the lands are conveyed, they are closed to mineral entry. No undiscovered mineral potential analysis was conducted for the Ring of Fire planning area. However, areas of High Mineral Potential were identified in the Mineral Occurrence and Development Potential Report (Appendix G) and included in the RFD analysis.
41 - 31	i. Pg. B7-1 -7.3.3- Southcentral Region -To make the table more complete, information included in IC 9113 should be added to the table. Resource calculations are available for several of the prospects listed such as Crown Point, East Point, Skeen Lechner, as well as for several prospects not included on the table (Nearhouse, Jewell, Heaston Oracle,.etc.). An additional target in the Hope/Summit Lake area would be the felsic dikes such as the Gilpatrick dyke which have potential for significant tonnage (>1,000,000 tons) at low grades (.01- .03 opt). Exploration for such deposits has not yet occurred.	See response to comment 41-15 under Edits Requested addressing Chugach National Forest concerns.

Edits Requested

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
41 - 32	j. Pg.B8-1 -8.0- Southcentral Region -"Mineral Activity reported during 2003...". Resurrection Creek had some small scale placer mining occurring on claims owned by the Hope Mining Company. This activity has been nearly continuous since the late 1970's. Total surface disturbance has been relatively small over that time period. Carol Huber at the Chugach National Forest may have more specific information.	See response to comment 41-15 under Edits Requested addressing Chugach National Forest concerns.
41 - 33	k. Pg. B8-1 -8.2- South central Region -"There is expected to be a very small...". This is true on BLM managed and state selected lands. Off these lands, some development work and/or mining can be expected in the Hatcher Pass area at the Lucky Shot Mine and also on Federal placer claims in the Chugach National Forest along Resurrection Creek.	See response to comment 41-15 under Edits Requested addressing Chugach National Forest concerns. Also see response to comment 41-25 under Edits Requested addressing Hatcher Pass concerns.
42 - 17	Please also note a correction needed on page D-1, fifth paragraph: the word "accepted" in the first sentence should be "excepted", in order to accurately describe options for surface stipulations.	"Accepted" has been changed to "excepted" in the first sentence of the fifth paragraph on page D-1 in Appendix D of the Proposed RMP/Final EIS.

End of section on Edits Requested

Enforcement and Monitoring

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
22 - 12	News articles of wanton sheep killing on BLM lands and documented experiences of trying to get wildlife enforcement in the area are testimony to the threat to wildlife in the drainage. Sustainable habitat is a must.	BLM agrees that monitoring and enforcement are important for resource conservation. These issues are ongoing concerns for BLM and are tied to the ability of BLM to adequately fund and staff these efforts. BLM prioritizes the efforts needed across their widely dispersed lands to make the most effective use of their budgetary resources in any given year. BLM objectives include the promotion of healthy, sustainable ecosystems, but also acknowledge that proper enforcement is a continual issue.
32 - 4	We live on the South side of Knik River and can see several miles of the BLM land along the north side of the Knik River. In a year, we can see 20 to 30 cars burning at night, cars which just a couple hours before were stolen in Anchorage or Eagle River and are now burning in the Knik River. When I contact the AST, their response is "we don't have a vehicle to get out there". On a good year 100 burned cars will be removed from this area.	Preliminary management objectives 1(c)iv and v in Appendix F in the Proposed RMP/Final EIS addresses this concern. Specific enforcement policies and responsibilities will be established during implementation-level planning, which will occur after completion of the Proposed RMP/Final EIS. BLM agrees that enforcement is a continual issue in this area.
37 - 3	Many of the problems can be solved by better law enforcement.	See response to comment 32-4 under Enforcement and Monitoring.
79 - 6	I fully support the idea of closely monitoring the impacts to wildlife and traditional human uses of the public lands surrounding these communities. There is steady and increasing pressure for commercial exploitation of the limited area between these communities and the Canada border. Few citizens of the region would want to see the impacts of Juneau, Anchorage, or the immediate vicinity of Skagway in the interior valleys.	Thank you, comment acknowledged.
85 - 13	An argument can be made that one reason for its failure is because the state lacks any mechanism for enforcement or that the public is unaware that such a policy exists. BLM does have enforcement authority so perhaps the policy, with sufficient enforcement, could provide some resource protection. However, the policy has a big ambiguous hole in its center—"whenever possible"—which, in my opinion, makes enforcement and even public education impossible.	The State's statute may be more effective on the ground in some areas than others because State enforcement personnel are called upon to enforce many laws and regulations throughout the state. The State does focus attention on problem areas. It is the BLM's intent, on State-selected lands, to emphasize education regarding the policy and the benefits of using existing trails, but also to enforce where deliberate OHV use off of existing trails is causing resource damage.

Enforcement and Monitoring

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
87 - 7	Public land managers have ignored the problems and admitted that the Knik River Valley has been sacrificed to unchecked recreation.	Comment acknowledged. BLM will work to address these issues in future implementation planning efforts for the Knik River SRMA.
111 - 4	PLEASE REQUIRE GPS COORDINATES FOR ALL LANDING AND PICK-UP SITES IN ORDER TO MONITOR PERMIT COMPLIANCE.	Although the recommendation is outside the scope of the Proposed RMP/Final EIS process, BLM will consider this recommendation when updating permitting requirements.

End of section on Enforcement and Monitoring

Fish

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
43 - 15	The Chilkoot River is also important for sport fishing; that was estimated to have brought in about one million in 2002. The lake, river, and small spawning streams are essential spawning ground for four species of salmon which are important to the Haines fishing fleet as well as to the sport fishermen and the wildlife.	BLM agrees that the Chilkoot River is important for sport fishing. Pursuant to this end, BLM management directives common to all alternatives espouse cooperation with other BLM programs (e.g., wildlife, vegetation, lands and realty, etc.) and other federal agencies and the state identifying need for relocation, closure, or maintenance of OHV trails to avoid key habitat features.

End of section on Fish

Hazardous Materials

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
5 - 3	Unfortunately, what your picture there doesn't show is the burned out loads of cars that are quite often -- and, I believe, that's at the mouth of Jim Creek, quite often out there in the water, polluting the water.	BLM acknowledges that there has been some environmental degradation of natural resources in this part of the Knik River valley (see 1.3.1 of PRMPF/EIS). Relative to these potentially hazardous materials, BLM's management objectives state that impacts caused by past hazardous materials will be mitigated subject to the availability of funds. Moreover, the implementation level planning for the Knik River SRMA (Figure 2.3-5) will have a beneficial impact on the regulation of hazardous materials in the area.
22 - 16	Far to many vehicles are losing fluids-sometimes in their entirety-into anadromous waters.	Please see response to comment 5-3 under Hazardous Materials. BLM agrees that potential pollution from vehicles losing fluid is a problem. Management actions proposed under all alternatives for hazardous materials may have localized, beneficial effects on water quality through prevention measures and mitigation practices as sites become known.
22 - 17	Thousands of rounds of lead are indiscriminately leached into the watershed annually.	BLM acknowledges that leaching of lead poses of potential problem to water quality. Management actions proposed under all alternatives for hazardous materials may have localized, beneficial effects on water quality through prevention measures and mitigation practices as sites become known. Water resources management objectives are described in section 2.5.10.1. Creation of the Knik River SRMA implementation plan will work towards creating a healthy and safe environment for all users and residents of the area.
32 - 3	There are also problems with dumping, often involving hazardous materials. This includes lead acid batteries, unknown chemicals, solid waste materials and used building supplies.	Please see response to comment 5-3 under Hazardous Materials.

End of section on Hazardous Materials

Lands and Realty

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
11 - 2	I'm a little unclear on what's going on down in Haines, so I'll probably try to give written comments on that. I'm a little curious on what's happening on the ridge, the stair step area up above Lake George and what kind of management is going to happen there and whether that deserves some special looks in that it is a large contiguous area	See response to comment 54-3 under Special Management Areas
16 - 13	Haines Area BLM lands that will be transferred to the state should be recommended as low priority for improved access.	BLM will continue to manage lands over which we have responsibility in a manner consistent with the requirements of FLPMA, through the application of the ROPs and stipulations (Appendix D), and other applicable laws. BLM will consider the management of the adjoining lands and attempt to be as consistent in our management as allowed by our policies.
25 - 7	Lands not selected by the State or private corporations and are retained by federal ownership should be managed under the regulations created by the Knik River Public Use Area.	Please see response to comment 16-13 under Lands and Realty.
28 - 7	Finally, it is our understanding that BLM is signatory to an agreement which will convey its lands within the Palmer Hay Flats State Game Refuge, a legislatively designated area (LDA). To date, only the Knik River Access lands have been conveyed. We would request that BLM complete the agreed-to conveyance of these lands to the State of Alaska, Palmer Hay Flats State Game Refuge, preferably before finalization of the RMP/EIS.	Thank you, comment acknowledged. BLM is pursuing this land transfer.

Lands and Realty

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 6	These (d)(1) withdrawals are no longer appropriate for two reasons: 1) most were made to enable ANCSA selections that have long since been completed, and 2) they supported the study of federal lands for possible designation as conservation system units, which was resolved by Congress with the Alaska National Interest Lands Conservation Act (ANILCA).	The withdrawals are a series of Public Land Orders (PLOs) issued by the Secretary of the Interior under the authority of Section 17(d)(1) of ANCSA that withdrew and reserved federal lands in Alaska for study and classification. These ANCSA 17(d)(1) withdrawals closed or segregated the lands from entry and disposal under all the public land laws (including mining and mineral leasing laws) except for PLO No. 5180, which allowed location for metalliferous minerals. The purpose of these orders was to maintain the status quo of the lands in order to complete inventories and assess resources for consideration in land management objectives for present and future public needs. Although the Secretary of the Interior has the authority to modify or revoke these withdrawals, such action usually occurs following the completion of land use plans. Revoking withdrawal orders issued under ANCSA 17(d)(1) is an administrative decision sufficiently guided by laws and regulations. BLM will maintain administrative withdrawals for other Federal agency's use and programs until, and unless, the agency for which the land was withdrawn requests revocation of the withdrawals.
33 - 13	We recommend conditioning the text in the Introduction, Chapter 2, and Appendix F to make it clear that these lands will be managed as special management areas should they be retained in long term BLM ownership. Nothing in this plan encumbers state or native selected lands. More specific suggestions are included in the Page Specific Comments.	Thank you for your comment. Text edits have been made in Chapter 2 and Appendix F.
33 - 20	Since Congress intended federal agencies to not categorize trapping as a commercial activity (unless it meets the criteria above), the decision by the Bureau to categorize trapping as a commercial use and require a lease for use on Bureau lands is incorrect. We request the Bureau correct this oversight in the final plan.	We disagree. BLM manages the leasing of public lands under the authority of FLPMA and the regulations found in 43 CFR 2920 and 43 CFR 8372 and the guidance found in BLM manual 2920.05 A, which addresses the leasing of public lands for trapping cabin purposes.
36 - 5	Some of the nominated parcels have been selected by Native corporations or the state and are awaiting adjudication. Until they are conveyed, we urge BLM to use the recommended protection designations to preserve the unique biological values of these parcels.	Please see response to comment 16-13 under Lands and Realty.

Lands and Realty

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
38 - 1	The map provided at the meeting showed several small (1 acre to maybe 200 acres) scattered all over the Kenai Peninsula. The best use of these small parcels would be sell them to the public. The University of Alaska has been selling by sealed bid. Maybe it will work for BLM.	The sale of public lands through FLPMA Section 203 (43 CFR 2710) is discussed in Chapter 2, Section 2.3.1.2 Management Common to All Alternatives.
41 - 7	The BLM must also continue to expeditiously complete the transfer of remaining State and Native selections so that the land ownership pattern is clear to all interested parties.	Recent legislation has taken steps to speed up the conveyance process, and BLM is committed to fulfilling State and Native corporation entitlements.
41 - 9	1. Open lands to Mineral and Energy Resource Exploration and Development (claim staking, leasing, sales) -This can best be accomplished by expeditiously clearing land title (finalizing State and Native selections), arranging for sale, disposals and exchanges of the many scattered and often isolated small parcels of land, and working to revoke the withdrawal orders issued under Section (d)(1) of ANSCA.	See response to comment 41-7 under Lands and Realty. Land tenure adjustments, disposals and acquisitions are analyzed when in the national interest. Land acquisition or disposal actions will include land transfers, exchanges, and sales as allowed under FLPMA, the Recreation and Public Purposes Act of 1954 and other applicable laws. Revoking withdrawal orders issued under ANCSA Section 17(d)(1) is an administrative decision sufficiently guided by laws and regulations.
41 - 24	Mineral deposits do not follow political or land ownership boundaries so it is entirely possible that deposits primarily on State or Native lands will extend onto BLM managed lands. Nothing should be done with federal lands, including access restrictions, that could adversely impact projects on State or Native lands.	Please see response to comment 16-13 under Lands and Realty.
43 - 20	However much still needs to be done and we could certainly use any help you have to offer, either by designating the river for some more protected status or by transferring BLM land to State Parks which already has management control of most of the land along the lower river.	BLM stands behind its evaluation of the river. The river's status is based on our analysis of the conditions of the river and the area. The consideration of transfer of lands between agencies is beyond the scope of this plan.
72 - 1	Due to the relative small acreages involved in the Kenai Peninsula parcels the best use is private property. Property should be sold.	Please see response to comment 38-1 under Lands and Realty.

Lands and Realty

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
79 - 4	Changes in Land Ownership-I have some concerns with ANCSA withdrawals. Some former public domain lands have been abused under these provisions. While there are clear examples of native use and rights to historic lands, there needs to be some form of safeguard on protecting the integrity of the motivations for certain claims. It would be well to consolidate and streamline holdings and parcels only if the exchanged parcels have some protections, and can be exchanged with other agencies.	There is no requirement for BLM to protect the integrity of the motivations for certain claims. Please see response to comment 119-12 under Lands and Realty.
80 - 2	Changes in Land Ownership I believe that the BLM should give up this area to the state as it has been selected by the Legislature for transfer of ownership. Obviously the BLM does not see this as a priority, and will probably not do this.	Please see response to comment 41-7 under Lands and Realty.
119 - 12	In addition to the specific comments below, we recommend that within all proposed and accepted Areas of Critical Environmental Concern (ACEC) and Special Recreation Management Areas (SRMA) in the Ring of Fire planning area, BLM maintain the ANCSA § 17(d) (1) withdrawals and Public Land Orders prohibiting oil, gas, and locatable mineral entry.	In those areas where the temporary withdrawal of public lands provided by ANCSA Section 17(d)(1) has fulfilled its purpose of limiting land status conflicts, it is appropriate to revoke the withdrawal and manage the lands according to multiple use concepts consistent with the resource values present.
119 - 22	Moreover, for the same reasons that the Neacola tracts should be afforded ACEC status, BLM should consider transferring to the National Park Service (NPS) ownership of the two Neacola Mountains ACEC tracts for inclusion as part of Lake Clark National Park and Preserve. BLM should seriously evaluate for park status administratively protected lands adjacent to existing national parks. We believe that management by the NPS, which has staff living and working in the immediate area, would afford even stronger protections to the remarkable scenic, wildlife and recreation resources identified in the proposed Neacola Mountains ACEC.	The consideration of transfer of lands between agencies is beyond the scope of this plan.
119 - 42	Although recent legislation indicates that the remaining land transfers will be completed within the next five years, BLM has the responsibility to establish the best possible management practices for all land it administers in the interim period.	Please see response to comment 16-13 under Lands and Realty.

Lands and Realty

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 87	BLM should proactively manage all lands it administers, regardless of status, until conveyed. Management of selected lands should err toward conservative stewardship obligations. This will ensure that the lands remain in high quality, minimally disturbed resource condition when, and if, BLM conveys the State-and Native-selected lands. By preserving lands it administers today, BLM is preserving lands it may retain after conveyances, and over-selection issues, are resolved.	Please see response to comment 16-13 under Lands and Realty.
119 - 90	We oppose BLM's plans to lift all of the protective ANCSA § 17 (d) (1) withdrawals in the planning area, thereby opening all available acres to locatable and leasable mineral entry. Neither Alternative D nor the measures proposed in the ROPS and Stipulations for surface disturbing activities would effectively prevent direct and cumulative impacts to existing public resources, such as recreation opportunities, wildlife habitat, and visual resources. Neither would be stringent enough to protect these resources in the event of a blanket removal of the ANCSA § 17 (d) (1) withdrawals. Maintaining ANCSA § 17 (d) (1) withdrawals within areas that are under consideration and/or are recommended for special management will afford the maximum protection for resource values	Please see response to comment 119-12 under Lands and Realty.

Lands and Realty

Comment #	Comment	Response
119 - 118	<p>This section of the Draft RMP/EIS also failed to explain how BLM's planning process – which likely will open to mineral development lands that have been protected for decades – relates to its ongoing review of the ANCSA § 17(d)(1) withdrawals. BLM failed to even mention the d-1 review, even though it identified other plans and planning processes relevant to the Ring of Fire RMP/EIS and included a description of the d-1 withdrawals. By failing to mention the concurrent d-1 review process, BLM misled the public and possibly the decisionmakers, by creating the impression that the Ring of Fire planning process is the only forum where it is reviewing the status of the d-1 withdrawals. Because both the d-1 and the Ring of Fire planning processes address the d-1 withdrawals (or a portion of them) and will likely result in the termination or revocation of some or all of the d-1 withdrawals, the Draft RMP/EIS should have explained the relationship between the two processes. By failing to do so, BLM failed to adequately inform the public about this important issue.</p>	<p>The intent of the ANCSA Section 17(d)(1) withdrawals was not to protect lands from mineral development. The withdrawals are a series of Public Land Orders (PLOs) issued by the Secretary of the Interior under the authority of Section 17(d)(1) of ANCSA that withdrew and reserved federal lands in Alaska for study and classification. These ANCSA Section 17(d)(1) withdrawals closed or segregated the lands from entry and disposal under all the public land laws (including mining and mineral leasing laws) except for PLO No. 5180, which allowed location for metalliferous minerals. The purpose of these orders was to maintain the status quo of the lands in order to complete inventories and assess resources for consideration in land management objectives for present and future public needs. Although the Secretary of the Interior has the authority to modify or revoke these withdrawals, such action usually occurs following the completion of land use plans.</p> <p>Chapter 3, Section 3.3.4.4 Withdrawals clearly discusses the ANCSA Section 17(d)(1) review process.</p> <p>The BLM will assess BLM-managed lands to determine the extent of available information regarding resource values, prior planning decisions, and land ownership patterns. Based on available data and known management objectives, BLM will make recommendations to Congress on lands that can be opened to entry, primarily for mining and mineral leasing. It is important to note that for the majority of the planning area the lifting of these withdrawals will have little or no effect because the lands have been selected by either the State or by an ANCSA corporation. The BLM Report to Congress inventories Sec. 17(d)(1) withdrawals and recommends the decisions to maintain or recommend the lifting of the withdrawal be made as part of the planning process. We have included this information in Chapter 2.3.1, Lands and Realty, Withdrawal review and to the discussion of withdrawals found in Chapter 3.3.4.4 Withdrawals.</p>

End of section on Lands and Realty

Leasable Minerals

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
24 - 5	Moreover, coal bed methane and natural gas activities should be located away from population centers and growth areas.	Comment acknowledged. BLM manages public lands for multiple uses in accordance with the Federal Land Policy and Management Act (FLPMA). Land use decisions are made that protect the resources while allowing different uses of those resources, such as energy development, and recreation. Where there are conflicts between resource uses, or where a land use activity may result in unacceptable or irreversible impacts to the environment, BLM may restrict or prohibit some land uses in specific areas. These are areas where it has been determined that other land uses or resource values cannot be adequately protected, and appropriate protection can be ensured only by closing the land to leasing through either statutory or administrative requirements.
28 - 2	<p>We are very concerned about the proposals for these lands as stated in this study, particularly as they pertain to any oil, gas, or mineral extraction activities. For example:</p> <p>Comparison of Alternatives -Fluid leasable Minerals (page 2-17)</p> <p>"To protect habitat for migratory birds within the Palmer Hay Rats (Figure 2.3-5), no oil and gas exploration activity or road building is allowed from March 15 to June 1, and from September 1 to October 31."</p> <p>This statement does not take into account the breeding and nesting of the thousands of dabbling and diving ducks, sandhill cranes, several species of geese and shorebirds during June, July and August.</p>	<p>Thank you for the comment. To protect habitat for migratory, stopover, and staging shorebirds and waterfowl; and habitat for breeding, nesting, and brooding of waterfowl, shorebirds, raptors, cranes, and song birds within the Palmer Hay Flats (Figure 2.3-5), no oil and gas exploration activity or road building is allowed from March 15 to October 31 (Appendix D).</p>
28 - 4	Additionally, the public's recreation and enjoyment of their Refuge would not be served by extraction activity at any time.	BLM will ultimately convey the Palmer Hay Flats to the State of Alaska. Future actions are subject to the application of the ROPS and stipulations as appropriate, and will go through the NEPA process, which may develop mitigation measures related to the potential impacts of the activity being considered.
28 - 15	WHEREAS, oil and gas leasing is not compatible with the stated mission and intent of the Palmer Hay Flats State Game Refuge Management Plan;	Thank you, comment acknowledged. See response to comment 28-4 under Leasable Minerals.

Leasable Minerals

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
28 - 16	WHEREAS, oil and gas leasing is anathema to critical wildlife habitat on Refuge lands;	Thank you, comment acknowledged. See response to 28-4 under Leasable Minerals.
119 - 99	BLM Failed to Comply with NEPA in analyzing mineral leasing impacts — In direct contravention of its duty to take a “hard look” at potential environmental effects, BLM solely listed general potential impacts. For instance, in Alternative B its analysis of the impacts of leasing on wildlife species constituted a single sentence: “[L]ocalized adverse effects to wildlife species and habitats may occur.” Draft RMP/EIS at 4-40; see also Alternative D at 4-43 (stating effects of Alternative D would be similar to Alternative B). BLM made no attempt to differentiate between species, identify species that may be particularly sensitive to development, or explain which habitats are most likely to be affected. See Draft RMP/EIS 4-38 (“Mining and oil and gas leasing could have adverse effects to wildlife species and important habitat”).	The Proposed RMP/Final EIS was prepared in accordance with applicable law. We took a hard look at the direct, indirect, and cumulative impacts of the decisions that were made. Our actions were in accordance with NEPA, the regulations issued by the Council on Environmental Quality, as well as the Department and our NEPA Handbook, H-1790-1 as well as other applicable environmental laws.

Leasable Minerals

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 115	<p>BLM's analysis of environmental impacts connected with Leasable and Locatable Minerals in each of the four alternatives in the Draft RMP/EIS was patently inadequate. For the reasons stated below, BLM must issue a revised Draft RMP/EIS to correct these deficiencies and to comply with its NEPA mandates.</p> <p>Most fundamentally, the Environmental Consequences chapter of the Draft RMP/EIS failed to identify a single environmental impact associated with the various levels of new leasing and mineral development that BLM proposed under each of the four alternatives. Instead, its analysis of Leasable and Locatable Minerals under each alternative focused entirely on the reduced access to mineral resources that would occur where lands remain closed to mineral entry. This is a perversion of BLM's mandate under NEPA.</p> <p>NEPA requires an analysis of the direct and indirect impacts of the proposed activity on the human environment. The human environment includes the full range of environmental values, including water quality and quantity, air quality, fish and wildlife, wetlands, and so on. Indeed, at the beginning of the Environmental Consequences chapter, BLM identified the "critical elements" of the human environment that must be addressed in its environmental analysis. In its subsequent discussion of the environmental consequences of each alternative treatment of Leasable and Locatable Minerals, however, BLM utterly abdicates this responsibility, not even identifying a single impact to the human environment as a result of opening up new lands to mineral entry.</p> <p>BLM failed to justify its lack of analysis. It cannot justify its failure to comply with its NEPA mandate on the theory that opening new BLM lands to mineral entry will not actually result in any mineral development in the foreseeable future. BLM foreclosed that argument by acknowledging its assumptions that oil and gas development will occur, that small placer mines are likely to be developed within the planning area, that development of nickel and platinum group elements (PGE) may occur, and that there will be increased demand for gravel to support road maintenance and construction. Since BLM assumed that these various forms of mineral development are likely to occur within the planning area during the life of the plan, the Draft RMP/EIS should have analyzed the potential environmental impacts of that projected mineral development.</p>	<p>Environmental impacts for leasable and locatable minerals were discussed in the preceding sections by resource. There is no need to restate them if the consequences are the same across all alternatives. Mineral development will occur on historic mining areas. No locatable mineral development will occur without a Plan of Operations, which contain site specific ROPs and stipulations, as well as abiding by all federal and state laws and regulations. Mineral activities will be monitored using existing BLM 3809 regulations.</p> <p>No placer mining activity is projected to occur outside of existing historical areas. Any placer operation would have a disturbance of 1 to 5 acres and reclamation would be occurring along side the mining operation. Less than 60 acres may be potentially disturbed on BLM lands (Section 4.2, Placer Gold). No hard rock mineral development is projected to occur within the planning boundary (Section 4.2, Other Deposits).</p> <p>Also, refer to Chapter 4, Environmental Effects. Specifically, Section 4.3 addresses direct and indirect effects and Section 4.4 addresses cumulative effects. The analysis is structured so that effects FROM potential mineral entry ON other resources are discussed under that particular affected resource (i.e. wetlands). The impacts analyzed in Chapter 4, Environmental Consequences, are based on land use activities (and their associated disturbances) identified in the Reasonably Foreseeable Development Scenarios for Oil and Gas and Locatable/Salable Minerals.</p> <p>Mitigation to avoid impacts are addressed in Appendix D. Additionally, further NEPA analysis will be conducted on site specific areas associated with any proposal to use lands open to mineral entry as well as being considered in implementation level plans.</p>

Leasable Minerals

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 117	BLM's analysis of Leasable and Locatable Minerals is flawed in several other respects. BLM's stated goal for Leasable and Locatable Minerals was far too narrow and failed to adequately consider the protection of sensitive resources on BLM lands. The goal as articulated emphasized the facilitation of increased resource development with a passing nod to protection of environmental values. BLM's land management mandate, however, extends far beyond resource development. BLM has a duty to protect the sensitive biological resources on its lands and to safeguard the public trust in those resources. Thus, BLM must revise its goal for Leasable and Locatable Minerals and place greater emphasis on protecting sensitive resources such as water quality, air quality, wildlife habitat, subsistence resources, and wilderness values.	Please see response to comment 119-116 under Cumulative Effects.
119 - 120	It also stated in its summary of alternatives for Leasable Minerals, Oil & Gas that all "essential habitat" for threatened and endangered species will be avoided. BLM should provide a definition of "essential habitat."	The term essential habitat was used to describe critical habitat for threatened and endangered species in the alternatives for leasable minerals, and oil and gas in the Draft EIS/RMP. This wording has been corrected throughout the document. USFWS is responsible for the designation of critical habitat for threatened and endangered species.
119 - 131	Should there exist deposits of coal bed methane in the planning area, BLM should seek extensive public input, respect local laws and regulations, and develop stringent mitigation guidelines before allowing development of these resources. For example, BLM should require adherence to the Matanuska-Susitna Borough regulations (MSB Chapter 17.62), adopted in October 2004, that require a conditional-use permit for any exploration and development of coal bed methane within the borough.	Please see response to comment 23-3 under Coordination and Compatibility.

End of section on Leasable Minerals

Locatable and Salable Minerals

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
41 - 6	<p>The four planning regions included in the Rim of Fire DRMPPEIS each include known deposits of locatable, saleable, and leasable minerals. Of potentially even greater significance, is the potential for discovery of additional mineral resources. Substantial lands within the study area have been closed to minera] entry since 1971 by the passage of ANCSA. Since that time new deposit models for mineral resources have been developed and applied to contiguous areas. Major discoveries have resulted, such as Greens Creek in the Southeast Region and Pebble in the South central Region. All section 17(d)(1) lands should be opened as soon as possible.</p>	<p>Please see response to comment 33-6 under Lands and Realty.</p>

End of section on Locatable and Salable Minerals

Mapping

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
23 - 2	<p>The Ring of Fire Draft did not contain adequate maps identifying sub surface ownership so we can only assume that these lands and their sub surface are under the control of BLM and the Federal Government. Not having accurate maps or information on sub surface ownership makes it difficult to address this issue in a comprehensive manner.</p>	<p>Agree. Presently, survey data is incomplete to accurately map all BLM subsurface lands in the Proposed RMP/Final EIS. However, additional subsurface maps were added to the document (Appendix A, Figures 3.7-1 and 3.7-2).</p>
33 - 36	<p>3.3.4.7 Access, Southeast Region, page 3 -143 Please expand upon the last paragraph on page 3-143 by adding the following: "The State of Alaska has prepared the Southeast Alaska Transportation Plan (SA TP 2004), which identifies 34 essential transportation and utility corridors to improve connectivity throughout the region. The ultimate development plan is to construct a highway through each of these corridors. Corridor number 2 extends southerly from Dyea (to the west of Skagway) along Taiya Inlet to Taiya Point, and then on to the Haines road system. This corridor crosses the easternmost portion of the Haines Block Special Recreation Management Area. Although these townships are state-selected, due to over-selections, there is a strong possibility that these townships will remain BLM-managed."</p> <p>Web link to the SATP: http://www.dot.state.ak.us/stwdplng/projectinfo/ser/newwave/SA_TP_FINAL/index.shtml.</p> <p>See in particular Map 16: http://dot.alaska.gov/stwdplng/projectinfo/ser/newwave/SATP_FINAL/assets/Map16.pdf. Our practice with other federal agency plans (i.e. USFS) has been to show a Transportation and Utility Corridor for state-proposed corridors on the associated EIS maps. We request that BLM consider illustrating the proposed transportation corridor crossing the Haines Block Special Recreation Management Area in Figure 2.3-4.</p>	<p>The proposed transportation corridor has been added to Figure 2.3-4 in the Proposed RMP/Final EIS.</p>
33 - 57	<p>Fluid Mineral Leasing, Figures 2.3-17 We were unable to locate a map depicting areas open for Fluid Mineral Leasing - Alternative D for Kodiak and the Alaska Peninsula. We assume that the map would be the same as for Alternative C and E in that all areas are open. However, clarification or insertion of a map for this region would be helpful.</p>	<p>Thank you for your comment. The map for Fluid Mineral Leasing - Alternative B for Kodiak and the Alaska Peninsula would be the same as for Alternative D. The map edit has been made in the Proposed RMP/Final EIS.</p>

Mapping

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 63	Figures D-5 and D-6, Swan Nesting Habitat Map. The maps shown in Appendix D do not apply the multi-year datasets that are available from the US Fish and Wildlife Service Migratory Bird Management Program. Trumpeter swan nesting is much more extensive in these areas than indicated on the map. We recommend the Bureau contact the US Fish and Wildlife Service Migratory Bird Management Program in Juneau for comprehensive maps of swan nesting habitat.	Thank you. The maps have been changed to reflect recent data on swan nesting habitat (Appendix D).
41 - 11	3. Geophysical and Geologic Mapping -We encourage BLM to continue its efforts to conduct modern geophysical, geochemical and water surveys along with geologic mapping and mineral and energy resource studies. Up-to-date information will be needed to properly implement the Final RMPEIS. We especially encourage more detailed assessments of the larger blocks of BLM managed land such as the Knik and Neacola Mountain blocks and, depending on ultimate dispensation, larger State/Native selected blocks such as the Haines block and any other large areas currently closed by ANCSA Section (d)(1).	Thank you, comment acknowledged.
41 - 12	4. Improve Readability of Map Figures -Map color choices along with the extremely small map scales, make it very difficult to distinguish between State Selected lands and water bodies and native selected lands and "other federal" lands (see especially figures G-2-5, G 15-33).	Map color choices and scales adhere to BLM GIS standards.
41 - 19	f. Pg. G 60 (4.2.3) -Maps clearly depicting land status as the underlay, with an overlay of mineral occurrence potential should be included. The small map scales and lack of geographic detail make it difficult to locate individual deposits.	Thank you, comment acknowledged.

Mapping

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
42 - 10	EPA is concerned that the Draft RMP/EIS contains conflicting information regarding the proposed Neacola Mountains ACEC, which should be corrected for the Final RMP/EIS. The text information presented in Volume 1 of the Draft RMP/EIS describes the proposed ACEC as a single area of approximately 229,000 acres, referred to as the southern block. However, the maps in Volume 2 consistently and incorrectly show two separate areas for the proposed ACEC; the southern block that is described in the text and a second northern block that contains the Chilligan River, among other natural features. The map discrepancy also showed up in a poster board that was used during the BLM's Draft RMP/EIS public hearings. The BLM clarified during the Anchorage public hearing, which EPA attended, that the map was in error and the description of the proposed ACEC that was included in the Draft RMP/EIS text was correct.	Notification of the correction was sent to those on the project mailing list and was posted on the BLM website. Both the letters and posting indicated that BLM extended the comment period 30 days (to January 30, 2006) to allow appropriate time for review of the corrections and invite additional comments regarding this matter. Please also see response to comment 53-2 under Special Management Areas.
47 - 4	Your map on Trumpeter Swan nesting indicates that there are no swan nests in the Knik River region. This is inaccurate. I believe that Alaska Department of Fish and Game and the U.S. Fish and Wildlife Service both have data indicating the historical and continued presence of nesting and rearing Trumpeter Swans. A good bit of this data comes from retired biologist/pilot William Quirk who has conducted aerial surveys documenting nesting and migratory swan use since 1998. Local residents and users have observed nesting swans for years. Finally, waterfowl surveys conducted in summer 2005 as part of the USFWS Coastal Management Grant Program, also documented nesting Trumpeters. In fact, one pair successfully reared eight cygnets!	The maps have been changed to reflect recent data on swan nesting habitat (Appendix D). Please see response to comment 33-63 under Mapping.
119 - 130	BLM failed to provide adequate maps identifying sub-surface ownership in the planning area. Thus, it is difficult for the public and the decisionmaker to assess where coal bed methane resource exist on lands BLM administers, either in the long-term or in the interim while it still maintains ownership of State and Native selections.	Please see response to comment 23-2 under Mapping.

End of section on Mapping

Natural Resources

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
22 - 18	As vegetation is destroyed, the glacial winds propel increasing amounts of silt down river.	Thank you, comment acknowledged.
22 - 19	And, as you are aware, dumping of all manner of trash is rampant.	Thank you, comment acknowledged.
39 - 4	Also, airborne particulates reduction is a large expense for Anchorage that should not be made worse by ORV and trailer transfer.	Thank you, comment acknowledged.

End of section on Natural Resources

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
6 - 2	I would like to also say that I do fully support this process, whether or not we restrict or open up any areas. I think this is definitely a very needed thing.	<p>Under NEPA (40 CFR 1500-1508), BLM is required to involve the public through public hearings and/or meetings in order to provide project information to interested parties, as well as to solicit appropriate information. Gathering input on the Draft RMP/EIS from potentially affected members of the public and other stakeholders is essential to the preparation of an effective Proposed RMP/Final EIS. BLM appreciates your participation in the public process.</p> <p>NEPA (40 CFR 1506.6) also requires BLM to make the Proposed RMP/Final EIS available for a protest period. The public will be notified of its availability by mail (if part of the project mailing list), newspaper, BLM website, and Federal Register.</p>
7 - 2	First, I want to thank URS and BLM for taking the time to come up to Palmer and for answering all our questions. And just for all your work along the way. Alaska Coalition has submitted scoping comments and also submitted some nominations for special area status. And I reviewed the draft document, and I found that they addressed the concerns that we submitted, so I really appreciate the public process.	Please see response to comment 6-2 under NEPA Compliance.
7 - 4	We strongly support the community based public process that will occur should this be included in the final.	See response to comment 6-2 under NEPA Compliance.
8 - 2	We appreciate the BLM going through this process. The public process is very important.	Please see response to comment 6-2 under NEPA Compliance.
17 - 13	Thank you for this opportunity to comment.	Please see response to comment 6-2 under NEPA Compliance.
18 - 6	Thank you for considering our thoughts on this project.	Please see response to comment 6-2 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
19 - 8	Thank you for considering our views. Please keep us informed of further progress on this RMP project.	Please see response to comment 6-2 under NEPA Compliance.
20 - 1	Sealaska Corporation appreciates receiving the CD that details the Ring of Fire EIS project and offers the following preliminary comments, which are limited to Southeast Alaska, for your consideration.	Please see response to comment 6-2 under NEPA Compliance.
20 - 4	The EIS mentions Carlana Creek near Ketchikan as a special area. Sealaska urges the BLM to carefully review the comments of those who live in the Ketchikan area.	Please see response to comment 6-2 under NEPA Compliance.
20 - 6	Thank you for providing Sealaska Corporation the opportunity to comment.	Please see response to comment 6-2 under NEPA Compliance.
21 - 2	Thanks for considering my concerns.	Please see response to comment 6-2 under NEPA Compliance.
24 - 1	Thank you for the opportunity to review the draft copy of the "Ring of Fire Draft Resource Management Plan and Environmental Impact Statement" prepared by the U.S. Department of the Interior and the Bureau of Land Management.	Please see response to comment 6-2 under NEPA Compliance.
24 - 14	Thank you for the opportunity to comment on this study; we look forward to working with BLM and the Anchorage Field Office to effectively manage resources within the Matanuska-Susitna Borough.	Please see response to comment 6-2 under NEPA Compliance. BLM appreciates your continued participation in the public process and your commitment to effective management of resources in the southcentral region.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
27 - 2	We thank you for the opportunity to participate in this process and respectfully submit these comments regarding the Ring of Fire Draft Resource Management Plan and Environmental Impact Statement.	Please see response to comment 6-2 under NEPA Compliance.
27 - 10	Once again, thank you for the opportunity to participate in this process.	Please see response to comment 6-2 under NEPA Compliance.
28 - 8	Thank you for the opportunity to review and comment on the Ring of Fire RMP/EIS.	Please see response to comment 6-2 under NEPA Compliance.
30 - 1	We are writing you on behalf of our clients, the Alaska Coalition, Sierra Club, the Wilderness Society, and Campaign for America's Wilderness, to inform BLM of its potential violations of the National Environmental Policy Act in providing inaccurate and misleading information in the Draft Ring of Fire Resource Management Plan and Environmental Impact Statement (RMP/EIS).	BLM is confident that, to the best of our knowledge, the Draft RMP/EIS does not contain inaccurate or misleading information. Additional information will be incorporated and/or changes will be made to the PRMP/FEIS based on public comment in order to reflect the most accurate information and straightforward analysis.
30 - 2	We are concerned that BLM waited until Wednesday, December 14, 2005, 15 days before the end of the comment period on the draft RMP/EIS, to announce errors in the maps of the Neacola Mountains Area of Critical Environmental Concern (ACEC). Moreover, BLM has not as of yet provided adequate public notice of these errors. Thus, BLM has failed to inform the vast majority of the commenters on the draft RMP/EIS who relied on these maps in drafting their comments that they had done so in error.	BLM apologizes for the error presented in the Draft RMP/EIS, maps, and public meetings. However, immediately upon identification of the error, BLM corrected all information presented to the public. Notification of the correction was sent to those on the mailing list. The letters and posting indicated that BLM extended the comment period 30 days (to January 30, 2006) to allow appropriate time for review of the corrections and invite comments regarding this matter. Throughout this process, BLM has adhered to NEPA guidelines in order to provide adequate notification and time for comment.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
30 - 3	<p>All Neacola Mountains ACEC maps included in the draft Ring of Fire RMP/EIS, provided to the public in outreach mailings, and presented for discussion at associated public hearings clearly identify two large tracts of BLM-administered lands as being included in the proposed ACEC. The sum of these two parcels totals approximately 365,000 acres of unencumbered BLM lands. At its December 14, 2005 public hearing, BLM announced the errors in the maps. Agency staff also recognized that the maps conflict with the text of the draft RMP/EIS, which recommends only 229,000 acres of BLM lands for inclusion in the Neacola Mountains ACEC.</p> <p>Thus, the maps provided to the public by BLM depict 137,000 acres more high value public lands within the proposed ACEC than does the text. As BLM is aware, the vast majority of the public that is commenting on this large, comprehensive federal planning document generally relies heavily upon maps for an analytical, visual synopsis of proposed management decisions. Therefore, the public cannot provide meaningful and substantive comments without accurate maps.</p> <p>Unfortunately, as BLM did not reveal the inaccuracy of the maps until the sixth of the seven public hearings scheduled for this RMP/EIS, most of the public is unaware of the inaccuracy. Such a late disclosure provides insufficient time for the commenting public to perform another analysis of the ACEC proposal, or to revise their comments accordingly. Because BLM failed to provide adequate notice of the inaccuracies or to timely circulate revised maps, we believe that it has not complied with its NEPA mandates. Instead, BLM has allowed the public to rely on misleading, inaccurate information that the agency provided, if accidentally.</p>	Please see response to comment 30-2 under NEPA Compliance.
30 - 4	Therefore, we believe that that BLM must revise the Neacola Mountains ACEC maps, provide proper public notice of the erroneous maps, and widely distribute the corrected maps to the public.	Please see response to comment 30-2 under NEPA Compliance.
30 - 5	BLM also should extend the public comment deadline by at least 60 days to provide the public adequate time to analyze and comment upon the new information. If BLM fails to do so, it likely will be found to have violated its NEPA obligations.	Please see response to comment 30-2 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
32 - 6	Thank you for reading about our concerns.	Please see response to comment 6-2 under NEPA Compliance.
33 - 1	The State of Alaska has reviewed the Bureau of Land Management (BLM), Ring of Fire (ROF) Resource Management Plan/Environmental Impact Statement (RMP/EIS). We appreciate the opportunity to offer comments and suggestions in support of the development of this plan pursuant to 43 CFR 1610.3-1. This letter represents the consolidated comments of state agencies.	Please see response to comment 6-2 under NEPA Compliance.
33 - 69	Thank you for the opportunity to offer comments on the Draft Ring of Fire Resource Management Plan/ EIS.	Please see response to comment 6-2 under NEPA Compliance.
34 - 1	Lynn Canal Conservation (LCC) is a Haines-based conservation organization. When we made Ring of Fire scoping comments in 2004, we nominated Haines Block lands to be included in an Area of Critical Environmental Concern (ACEC) to be managed as a Research Natural Area (RNA). We were truly surprised that there was neither acknowledgement nor evaluation of this nomination in the DEIS.	BLM did consider and evaluate this nomination as an ACEC as required by NEPA (40 CFR 1503.1) but did not assign this designation in the Draft RMP/EIS. The PRMP/FEIS elaborates on this consideration in Section 2.2.
34 - 6	The DEIS correctly identifies the primary Haines Block scoping issue as the growth of helicopter-based recreation and potential impacts to mountain goats and other wildlife. See DEIS at 1-4. However, the DEIS fails to mention that the Alaska Department of Fish and Game (ADFG) also expressed concerns about this particular issue in this particular area. See June 16, 2004 letter from Polly Hessing to Robert Lloyd. The Scoping Report was supposed to list public and agency "Wildlife and Habitat" comments. Department of Natural Resources "Wildlife and Habitat" comments are included in the Scoping Report, but not ADFG comments. See DEIS Appendix B at 21 and 22. LCC believes that when ADFG expresses concerns about the impacts of helicopter recreation on mountain goat resources in the Haines area, BLM should consider these concerns because BLM relies on ADFG to manage wildlife populations on BLM lands. See DEIS at 1-11.	The Scoping Report presented in Appendix B of the Draft RMP/EIS reflects public and agency scoping that occurred from March 19, 2003 through July 31, 2003. The ADF&G letter you are referring to would not have been included in the Scoping Report because it was not submitted during this timeframe. BLM has considered all substantive comments from ADF&G and other state, local, and federal agencies received during scoping and other specified comment periods. Generally, these comments are addressed in the Scoping Report, Draft RMP/EIS, and/or Comment Analysis Report.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
34 - 7	A second glaring omission in the DEIS is that there is no mention - in the Scoping Report or elsewhere - that LCC nominated Haines Block lands for an Area of Critical Environmental Concern (ACEC) to be managed as a Research Natural Area (RNA). See DEIS Appendix B at 12. There is also no mention of letters of support for this designation from ADFG, and the Alaska Center for the Environment, Alaska Coalition, Alaska Wildlife Alliance, Defenders of Wildlife, Sierra Club Alaska Chapter, Southeast Alaska Conservation Council, and the Wilderness Society. Not only should our nomination be mentioned in a supplemental EIS, but also considered.	Please see response to comment 34-1 under Special Management Areas. The Draft RMP/EIS has evaluated the comments submitted during scoping, but does not document every nomination. The section dealing with Issues Considered but not Analyzed further consolidates nominations for WSRs, ONAs, ACECs, and is contained in Section 2.2 of the Proposed RMP/Final EIS.
34 - 36	Thank you for the opportunity to provide these additional comments.	Please see response to comment 6-2 under NEPA Compliance.
35 - 5	We appreciate the opportunity to comment on the BLM Ring of Fire RMP/EIS.	Please see response to comment 6-2 under NEPA Compliance.
40 - 7	Thank you for considering these comments.	Thank you, comment acknowledged.
41 - 1	Thank you for the opportunity to comment on the Ring of Fire DRMPEIS.	Please see response to comment 6-2 under NEPA Compliance.
42 - 6	We do have concerns about incorrect and confusing information presented in the Draft RMP/EIS, and the potential for adverse impacts to biological, cultural and subsistence resources under the current suite of required operating procedures (ROPs) and lease stipulations, particularly for future management of lands that will be open to mineral and oil and gas exploration and extraction.	Thank you, comment acknowledged. Future proposals will be subject to the NEPA process, the application of the appropriate ROPs and stipulations, and specifically an evaluation pursuant to ANILCA Sec. 810. Also see response to comment 30-1 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
42 - 11	EPA's review must be based on the Draft RMP/EIS document; however, we also received on December 27 the BLM's letter that corrects the mapping information presented in the Draft RMP/EIS and clarifies the proposed Neacola Mountains ACEC is the single 229,000- acre southern block. The letter also corrects Table 2.4-1, which assigned Visual Resource Management Class III instead of Class II to the proposed ACEC. The letter indicates the BLM has extended the comment period by thirty (30) days (until January 30, 2006) in order to correctly portray the proposed ACEC and allow time for public review of the correction. EPA commends the BLM for its corrective action efforts, and we recommend that the BLM also provide the updated information and corrective action on the agency's external web site, if that has not already been done.	Notification of the correction was sent to those on the mailing list and was posted on the BLM Ring of Fire website. Both the letters and posting indicated that BLM extended the comment period 30 days (to January 30, 2006) to allow appropriate time for review of the corrections and invite comments regarding this matter. BLM appreciates your support of the public process.
42 - 24	EPA appreciates the opportunity to provide comments on the Draft Ring of Fire RMP and EIS.	Please see response to comment 6-2 under NEPA Compliance.
45 - 10	Thank you for this opportunity to comment.	Please see response to comment 6-2 under NEPA Compliance.
46 - 2	Thank you for taking the time to read and consider my viewpoints.	Please see response to comment 6-2 under NEPA Compliance.
47 - 6	Thank you for the opportunity to comment on the BLM Ring of Fire RMP/EIS.	Please see response to comment 6-2 under NEPA Compliance.
48 - 1	Eklutna, Inc. (Eklutna) has land holdings and substantial other selections within the area that is being considered in the above referenced matter. Eklutna has been asked to comment on this matter.	Please see response to comment 6-2 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
53 - 5	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	Under NEPA (40 CFR 1506.6), BLM is required to make the Draft RMP/EIS and supporting documents available to the public, agencies, and Native tribes for review, with appropriate time for interested parties to provide comments. BLM saw it necessary to extend the comment period in order to provide a thorough review of the Draft RMP/EIS revisions. BLM appreciates your participation in the review process and comment period.
58 - 2	Thank you very much for this opportunity to express my views.	Please see response to comment 6-2 under NEPA Compliance.
63 - 1	I appreciate the opportunity to comment as well as your sincere consideration of my comments on this very important matter.	Please see response to comment 6-2 under NEPA Compliance.
66 - 1	Please take the time to regard my concerns.	Please see response to comment 6-2 under NEPA Compliance.
67 - 1	Please take the time to regard my concerns.	Please see response to comment 6-2 under NEPA Compliance.
79 - 1	Thanks for the opportunity to provide input on this process.	Please see response to comment 6-2 under NEPA Compliance.
84 - 1	I have read portions of the Resource Management Plan for BLM lands in the Haines area and I would like my comments considered in your planning decisions.	Please see response to comment 6-2 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
85 - 7	I want BLM to pay as much attention to the Knik River group as it does to the Alaska Outdoor Council or other motorized interests in this regard.	It is a requirement of NEPA (40 CFR 1503) that BLM invite comments from interested parties, as well as consider and address all substantive comments regardless of the commenter's affiliation. Gathering input on the Draft RMP/EIS from potentially affected members of the public and other stakeholders is essential to the preparation of an effective Proposed RMP/Final EIS.
86 - 5	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	Under NEPA (40 CFR 1500-1506), BLM is required to make the Draft RMP/EIS and supporting documents available to the public, agencies, and Native entities for review, with appropriate time for interested parties to provide comments. BLM saw it necessary to extend the comment period in order to provide a thorough review of the Draft RMP/EIS revisions. BLM appreciates your participation in the review process and comment period.
87 - 11	Thank you for the opportunity to make our comments.	Please see response to comment 6-2 under NEPA Compliance.
88 - 6	Thank you for your considering my comments.	Please see response to comment 6-2 under NEPA Compliance.
89 - 8	Thank you for your consideration.	Please see response to comment 6-2 under NEPA Compliance.
90 - 5	Thank you for your considering my comments.	Please see response to comment 6-2 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
91 - 4	Thank you for this opportunity to comment on BLM's Ring of Fire management proposals for the Neacola Mountains/Chilligan River area. Please include my comments in your record of public comments on these management proposals.	Please see response to comment 6-2 under NEPA Compliance. Also see response to comment 70-5 under Special Management Areas.
93 - 4	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	See response to comment 53-5 under NEPA Compliance.
94 - 5	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	See response to comment 53-5 under NEPA Compliance.
100 - 5	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC. I appreciate your sincere consideration of my comments on this most important matter.	See response to comment 53-5 under NEPA Compliance.
101 - 5	Thanks for the extension of the public comment period, which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	See response to comment 53-5 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
104 - 5	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	See response to comment 53-5 under NEPA Compliance.
106 - 5	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	See response to comment 53-5 under NEPA Compliance.
107 - 5	I appreciate the extension of the public comment period which has allowed me additional time to consider the management alternatives presented within the draft Ring of Fire, particularly the alternatives for protecting the proposed Neacola Mountains ACEC.	See response to comment 53-5 under NEPA Compliance.
108 - 1	I would like to thank you for extending the comment period for the Draft Ring of Fire RMP.	See response to comment 53-5 under NEPA Compliance.
109 - 5	Thank you for taking my comment.	Please see response to comment 6-2 under NEPA Compliance.
113 - 1	Thank you for the opportunity to submit comments on the Ring of Fire Draft Resource Management Plan/EIS (DRMP/EIS).	Please see response to comment 6-2 under NEPA Compliance.
113 - 24	Thank you for your consideration,	Please see response to comment 6-2 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
115 - 1	Thank you for seeking public comment on the Ring of Fire region;	Please see response to comment 6-2 under NEPA Compliance.
115 - 4	Thank you for your time and consideration	Please see response to comment 6-2 under NEPA Compliance.
119 - 2	We thank you for the opportunity to actively participate in this resource planning process and assist BLM in tailoring the plan objectives to meet the best interests of the natural resources, wildlife habitat, and all users of these 1.3 million acres of public lands.	Please see response to comment 6-2 under NEPA Compliance.
119 - 15	We are concerned, however, that BLM may have complicated, and possibly discouraged, public comment on this issue by publishing misleading information about the proposed acreage of the Neacola Mountains ACEC. Although the error likely was inadvertent, the text of the Draft RMP/EIS and the graphic representation of the proposal displayed in Figure 2.3-3 provided conflicting acreages for the ACEC. Although we commend BLM for correcting the record and extending the comment period, the burden on the average citizen of preparing a second set of comments may have been too great. Moreover, we were disappointed to see that BLM chose the smaller of the two acreages for inclusion in the proposed Neacola Mountains ACEC.	Please see response to comment 30-2 under NEPA Compliance. Also see response to comment 53-2 in Special Management Areas.
119 - 53	We are disappointed that the Draft RMP/EIS fails to mention or consider the scoping nomination of the Lynn Canal Conservation (LCC), which our organizations also supported, for the designation of BLM-managed lands in the Haines Area as an ACEC to be managed as an RNA.	Please see response to comment 34-1 under NEPA Compliance.

NEPA Compliance

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 85	<p>Moreover, BLM failed to account for, or fully explore, mitigation measures, as it was required to do pursuant to the Council on Environmental Quality guidance governing environmental impact statements, 40 C.F.R. § 1502.14 (EIS must include appropriate mitigation measures not already included in proposed action or alternatives). BLM should re-evaluate and provide analysis of alternatives that would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes, and provide adequate foundation for its analysis.</p>	<p>A detailed set of mitigation measures is examined in Appendix D, including 103 proposed required operating procedures (ROPs) and eight lease stipulations. These specific and feasible mitigation measures represent the result of BLM experience in land use management in Alaska and nationally. The Draft RMP/EIS examined a set of alternatives developed to address issues identified in the scoping process. Some issues were not appropriate for review in the plan (see Chapter 1), and these were not incorporated into alternatives. The current range of alternatives constitutes an analytically sound effort to identify contrasting management approaches to development activity, with some alternatives reducing or eliminating some uses.</p>
119 - 98	<p>BLM failed to analyze mitigation measures — NEPA requires an agency to describe and analyze the effectiveness of proposed mitigation measures. See 40 C.F.R. § 1502.16(h) (EIS "shall include discussions of . . . means to mitigate adverse environmental impacts"). "The requirement that an EIS contain a detailed discussion of possible mitigation measures flows both from the language of the Act and, more expressly, from CEQ's implementing regulations." <i>Robertson v. Methow Valley Citizens Council</i>, 490 U.S. 332, 351 (1989). "Mitigation must 'be discussed in sufficient detail to ensure that environmental consequences have been fairly evaluated.'" <i>Neighbors of Cuddy Mountain v. United States Forest Serv.</i>, 137 F.3d 1372, 1380 (9th Cir. 1998) (citing <i>Carmel-By-the-Sea v. U.S. Dep't of Transp.</i>, 123 F.3d 1142, 1154 (9th Cir. 1997)). Here, BLM failed to provide any analysis of the mitigation provided by the proposed stipulations and ROPs.</p> <p>In its analysis of environmental affects, for each resource BLM merely stated that activities will be subject to stipulations and ROPs. See, e.g., Draft RMP/EIS at 4-18 ("All mineral development would be subject to ROPs and stipulations"). BLM failed to identify the most relevant mitigation measures. Nowhere did BLM attempt to analyze the effectiveness of the stipulations and ROPs or explain how they were developed.</p>	<p>Please see responses to comments 119-95 under ROPs and Stipulations and 119-85 under NEPA Compliance.</p>
119 - 100	<p>BLM Should Clarify Whether it Will Rely on RMP/EIS for Future Decisions — BLM must provide the public with opportunities to provide analysis and input on any proposals for future resource development, or other activities that may damage resources or resource values in the planning area. This includes review of draft documents, such as Environmental Assessments.</p>	<p>Agreed. It is a requirement of NEPA (40 CFR 1503 and 1506) that BLM provide the public with opportunities to review and comment on NEPA documents, such as an EIS or EA.</p>

End of section on NEPA Compliance

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
3 - 2	<p>There are approximately 100 million acres of wild and national parks and 57 million acres of wilderness areas, all set aside for those people who can't stand to listen to the sound of motor vehicles.</p> <p>And with all those millions of acres in Alaska set aside for those people, they got to take this little bit of area in the Knik River Valley, which is mostly mud and sand and gravel bars, and try to restrict it and keep people out of there because they hate four-wheelers.</p>	<p>Thank you for your comment. The Knik River Area is very accessible for many Alaskans because of its proximity to several highly populated communities. BLM recognizes this accessibility and how all types of recreationists are attracted to the area because of it. BLM proposes the establishment of the Knik River SRMA under Alternatives C and D to provide the framework for additional implementation-level planning that will maintain a diversity of recreation opportunities in the area.</p>
4 - 2	<p>They ride their ATVs -- and Don Irwin who was the head of the colonist colony in '35 wrote a book in 1965 and he majored in agriculture and agronomy. And agronomy is erosion. And he stated that with the winds on the Knik and the Matanuska River, if you destroy the vegetation, you are going to have complete erosion. And that is what is happening over there.</p>	<p>The Draft RMP/EIS recognizes the impacts to natural resources from unregulated OHV use (see Chapter 4). Such documented resource impacts, combined with the need to continue to provide for a diversity of recreational experiences, drive the OHV proposals described in the Preferred Alternative (D) and Alternative C. These proposals include designating a majority of BLM-managed lands as limited to OHVs, with site-specific limitations to be determined in implementation level planning.</p>
9 - 2	<p>I'm not around very much, but I can recount a half a dozen times I had bullets slinging by me within 50 feet. I had a bullet hit my metal shop one time, it makes a lot of noise. I had a bullet hit a swing set when I and my two youngest children were out on the trampoline, 20 feet from it.</p> <p>And it's pretty disheartening to tell a little boy when he looks at you and say, dad, was that a bullet? And what do you say? Yes, it was. And then to have kids say, oh, it's okay to the others kids. That's a shotgun. Those bullets can't come over here. Or to be woken up at -- going to bed at 11:00 to be woken up at midnight by a high-powered rifle on a foggy night. It's pretty unnerving. It wakes you up just like that. It's hard for this guy to get back to sleep.</p>	<p>BLM is concerned about the public safety issues in the Knik River Valley and is committed to working with adjacent landowners during the implementation level planning process to come to management solutions regarding this issue.</p>

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
11 - 4	I'd really like to see nonmotorized upland and wetland routes through the area, which would be available for nonmotorized users. I'd like to see motorized use be limited to designated trails, not just simply existing trails because I think that the current situation out there has been fairly out of control. There is a number of trails that are not appropriate that do go into wetland areas and other areas that I'm not aware of in addition to that. And so I think that there needs to be a look at closing some of the existing trails and not grandfathering those in.	BLM recognizes the non-motorized use of the Knik River Valley, and has assigned the "limited" OHV classification to the area. We intend to further define the management of the Knik area through the development of an implementation plan, which will incorporate the goals (stated in Appendix F of the Proposed RMP/Final EIS) for the Knik River SRMA. BLM is committed to working with all of the interested parties as part of its planning process. BLM will assess and manage areas and, if necessary, can use seasonal closures, off-sets and trail designations to mitigate damage to sensitive areas. BLM may also, during the development of the implementation plan for the Knik River SRMA determine that there are areas which should be managed to allow additional OHV use.
12 - 4	And I'd just like to set the record straight that ACE is not opposed to OHV use in this area. We do believe that it is an appropriate use for certain parts of the Knik watershed. Ideally, we would like to see closures, though, to heavily damaged areas and also close attention paid to critical habitat areas within the watershed. Since many of the upland/wetland areas are springfed with open water year-round, seasonal closures I don't think would be effective, especially during times of breakup and the spring melt. We also have some reservations of the grandfathering in of existing OHV trails. The BLM should be careful to allow OHV use on all current trails, for some trails may not be suitable for the planning area.	BLM is committed to working with interested parties during implementation level planning in order to determine site-specific actions, impacts, designations, and mitigation measures associated with motorized and non-motorized activities. BLM has committed to completing specific implementation level planning in the next five years. BLM will assess and manage areas and, if necessary, can use seasonal closures, off-sets and trail designations to mitigate damage to sensitive areas. BLM may also, during the development of the implementation plan for the area determine that there are areas which should be managed to allow additional OHV use.
14 - 3	With that said, commenting on the preferred alternative, Alternative D, it makes a lot of sense, and I commend what you folks have done in sort of embracing the idea of the State's generally allowed uses for off highway vehicles. I think that that's a great step in the right direction, especially considering that so many of these lands are adjacent to State lands. And just the management of what you can do when you cross an imaginary boundary would be hard to keep track of.	Thank you, comment acknowledged.
14 - 4	Most of the people that are members of the alliance are motorized users that do feel that the State's generally allowed uses are appropriate and a decent way of managing that resource. And so embracing that idea and classifying the lands as limited and mentioning the State's generally allowed uses make us more comfortable than not.	Thank you, comment acknowledged.

Off-Highway Vehicles

Comment #	Comment	Response
14 - 5	<p>One thing I'd like to point out about the generally allowed uses, however, is that technically it's not just existing trails. It's -- the generally allowed uses are slightly more liberal than that in what you can do. In other words, it wouldn't be a matter of classifying the trails in terms of -- inventorying the trails in terms of the way the State manages that. It would be more of a matter of using an existing trail where you can. In fact, in the statute it says use existing trails when possible. It puts limitations on what can happen on the off-trail usage. For instance, it would be illegal to tear up the vegetative mat. And I would like to stress that the preferred alternative should fully embrace that idea.</p>	<p>Limitations within the ACEC and two SRMAs would be defined through development of implementation plans. For all other BLM-managed lands, the Proposed Action limits OHV use to existing roads and trails and is the same as The Generally Allowed Uses on State Land, which among other things, requires OHVs to stay on existing trails and prohibits alteration of drainage systems, significant rutting, and ground disturbance.</p>
16 - 5	<p>Snowmobile Impacts – Tourism and Local Recreation The same or similar methodologies used in evaluating helicopter impacts on wildlife need to be applied to snowmobile impacts on sensitive species.</p>	<p>Snowmachines are considered to be an OHV for the purpose of the analysis in the Proposed RMP/EIS (see Section 3.3.10). BLM evaluated the effects of OHVs on wildlife for all alternatives in Section 4.3.1.5 and 4.4.3.4, which includes BLM sensitive species. In addition, Section 4.3.1.5.1 of the Proposed RMP/Final EIS identifies four specific management objectives are common to all proposed alternatives. These objectives acknowledge the special status and management needs of BLM sensitive species.</p>
17 - 11	<p>AQRC recommends that BLM designates its lands within the proposed special management units as "limited" without reference to the state's policy. In that way, BLM would have much more flexibility in managing OHV activity in the interim. For example, it could post its lands and require OHVs to stay on roads and trails, without exception.</p>	<p>The Preferred Alternative (D) is the "limited" OHV classification for BLM-managed lands (including all SMAs). We intend to further define the management of the proposed SMAs through development of implementation plans which incorporate the goals stated in Appendix F.</p>
17 - 12	<p>We note that the Plan does make special provisions for snowmachining (e.g., see page 3-165). In accordance with the "Conditions for Generally Allowed Uses", which modifies the more general statement of policy contained in "Travel Across State Land", snowmachines under this Plan must stay on trails and roads whenever possible. AQRC doubts the snowmachine community agrees with this stance or that this is BLM's intent.</p>	<p>The Proposed RMP/Final EIS does not make special provisions for snowmachining. As discussed on pages 3-165 of the Draft RMP/EIS, BLM is required to provide "reasonable access to subsistence resources on public lands" under Section 811 of ANILCA. This allows for "appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation."</p> <p>Limiting snowmachines to designated trails could change based on public involvement and comment during implementation level planning.</p>

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
18 - 4	ORVs should be allowed only on routes approved BLM where it is clear ORVs will not cause deterioration of the habitat.	Please see response to comment 4-2 under Off-Highway Vehicles.
19 - 4	We ask BLM to include the SRMA in the final RMP, with management prescriptions that will protect the wildlife and fish habitat there from over-use and inappropriate use by off-highway vehicles.	Please see response to comment 4-2 under Off-Highway Vehicles.
19 - 5	If you do not gain control of OHV traffic and direct it to routes where it will do no harm to the resource, it will soon get away from you and cause real damage.	BLM intends to emphasize educating the public on the benefits of using existing trails, but BLM will also enforce adherence to OHV use restrictions where deliberate OHV use off of existing trails is causing resource damage. See response to comment 4-2 under Off-Highway Vehicles.
22 - 5	ORV traffic is invading these wetlands from all sides, including from the adjacent BLM lands, particularly the Friday Creek trails area. Friday Cr. has changed channels in the past few years -roughly 70% of it now flowing directly into the wetlands. Friday Creek is chock full of salmon and has fragile banks currently with no protection (we already have an example of a lost anadromous stream - still listed in the ADF&G catalog -in the watershed).	<p>See response to comment 4-2 under Off-Highway Vehicles. The Proposed Action delineates travel management for off-highway vehicle use as "Limited". This delineation will limit use to existing roads and trails (National Mgt. Strategy for Motorized OHV Use on Public Lands, DOI, January 2001). Implementation of Limited use area designations for OHVs would be effective immediately after signature of the decision record.</p> <p>Additional or site-specific Travel Management Planning will be addressed and implemented within implementation level plans, such as ACEC or Special Recreation Area Management plans, which are produced after the PRMP/FEIS is approved. Through the development of activity-level plans, produced with public involvement, resources may receive further levels of necessary protection from vehicle use.</p> <p>It is not practical to define within the Ring of Fire PRMP/FEIS a specific date or timetable of when future implementation level plans would be processed. Per BLM policy, this work normally should be completed within 5 years of the signing of the ROD (BLM Land Use Planning Handbook - 1601, Comprehensive Trails & Travel Management, 3/11/06).</p>

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
22 - 6	ORV's tend to follow water flows -in the early 80's I witnessed in dismay as unthinking ORV operators completely destroyed an extremely large beaver dam at Wolf Point (BLM land) by using it as a causeway.	Please see response to comment 4-2 under Off-Highway Vehicles.
22 - 7	Ad hoc motorized traffic is threatening to completely encircle the wetlands via the Rippy Tr. and, at the same time invade the extremely narrow wildlife corridor/transitional zone between the rocks and wetlands, is accessible from Friday Creek on BLM lands. Feeder springs that remain open all year around abound, many already in ugly messes.	Please see response to comment 4-2 under Off-Highway Vehicles.
22 - 8	(Special consideration for the waterways, such as horsepower limits are overdue.)	Thank you for your comment; however, BLM has no authority to set horsepower limitations on waterways.
22 - 9	Many branch trails penetrate right into the vegetative mat and into documented waterfowl, fish and moose habitat. BLM is in a position to help turn around the rapid degradation in the entire watershed by virtue of applying sensible and legal management to their portion.	Sections 3.3.10.1 and 4.3 in the Proposed RMP/Final EIS acknowledges that trail braiding is occurring and that OHV use has impacted multiple resources within the planning area to varying degrees. The documented resource impacts drive BLM's proposal to change trail and OHV management from the status quo to a more proactive role. These proposed changes are discussed and analyzed under Alternatives C and D in the Proposed RMP/Final EIS. The Proposed Action delineates travel management for off-highway vehicle use as "limited." This delineation will limit use to existing roads and trails (National Mgt. Strategy for Motorized OHV Use on Public Lands, DOI, January 2001). Implementation of limited use area designations for OHVs would be effective immediately after signature of the decision record. The documented resource impacts that are occurring drive the need for BLM to propose changing OHV management from the status quo to a more proactive role in trail and OHV management. These proposed changes are discussed and analyzed under the Proposed Action and Alternative C in the PRMP/FEIS.

Off-Highway Vehicles

Comment #	Comment	Response
25 - 5	Weight restrictions should not be implemented on the RS 2477 trail or any other existing trail that exists in this area. People retrieving game should not be restricted to the trail system. Restrictions on the trails leads to wanton waste of game animals.	The Proposed Action and Alternative C would consider weight restrictions in specific travel management areas during implementation level planning. This process will determine specific designated trails or restrictions, and will consider the allowance of off-trail use for game retrieval, etc. BLM also intends to use education to inform the public about the benefits of using existing trails as well as the penalties associated with traveling off-trail and causing resource damage.
29 - 2	We applaud and support BLM's effort to bring their "Limited" designation in-line with the State's "Generally Allowed Uses on State Land" policy. However, in the Ring of Fire RMP draft the definition of "Limited" is often stated as simply "existing trails". In the Alaska Administrative code AAC 96.025, the Alaska State law states "vehicles must use existing roads and trails whenever possible". There are no stipulations defined for legitimate reasons for leaving the trail, only that an existing trail must be used when possible. Where the BLM documentation suggests reasons for leaving the trail, such as noted in section 2.3.5, "If necessary (e.g. game retrieval)", we're concerned this may result in a closed list of acceptable reasons for leaving the trail. We request the document be modified to make it clear that those are only examples and that a specific list of approved reasons for leaving the trail is neither defined nor necessary. In other words, it should be legal to be off the trail when it's not possible to stay on an existing trail regardless of the purpose or destination. All other State limitations for off-trail use should also apply to protect the vegetation. This consistency with State law is especially important considering the high percentage of Ring of fire lands that are planned to be conveyed to the state.	You are correct that the "limited" designation is in-line with the State's "Generally Allowed Uses" policy. Both encourage OHVs to use existing roads and trails whenever possible. The "Generally Allowed Uses" are written to allow cross-country travel when there is not an established trail, and that when doing so, care is taken not to disturb the vegetative mat. The key is that travel off of existing routes must minimize "disturbance of vegetation, soil stability, or drainage systems; changing the character of, polluting, or introducing silt and sediment into streams, lakes, ponds, water holes, seeps, and marshes; and disturbance of fish and wildlife resources." (11 AAC 96.025). It is BLM's intent to conduct implementation-level planning in travel management areas within the next five years, which will determine specific designated trails or restrictions, and will consider the allowance of off-trail use for game retrieval, etc. BLM also intends to use education to inform the public about the benefits of using existing trails as well as the penalties associated with traveling off-trail and causing resource damage.
29 - 7	We are pleased with the draft RMP where any OHV limitations are defined to be consistent with the State's "Generally Allowed Uses on State Land". This seems to be the default OHV designation for the Ring of Fire areas.	Thank you, comment acknowledged.
31 - 5	We also believe that any regulations included in the upcoming "Ring of Fire" should be in accordance with the State of Alaska "Generally Allowed Uses" of public land. We believe that the generally allowed uses are appropriate, reasonable, and compatible with most users of public land and with "traditional uses" of land in the Butte area.	Thank you, comment acknowledged. This is the current approach in the PRMP/FEIS.

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
31 - 7	Millions of acres of Alaska lands have been designated as National Parks, Wilderness, Wildlife Refuges, State Parks, etc. Most of these land areas are designated as "non-motorized". We feel that enough has been set aside for those who want a non-motorized "wilderness" experience, and we need our own relatively small area designated for off road motorized use.	Please see response to comment 3-2 under Off-Highway Vehicles.
32 - 2	Our main concern is that this area is being overrun with uncontrolled, careless and destructive use by Off Road Vehicles (ORV) and reckless, destructive shooting. This excessive ORV use is pushing new trails into wildlife nesting grounds, impacting wild life and swans, driving them off their traditional nesting grounds. This includes fireworks, shooting and the use of large air boats as well as ORV's.	The Proposed RMP/Final EIS recognizes the impacts to natural resources from unregulated OHV use (Chapter 4). Such documented resource impacts, combined with the need to continue to provide for a diversity of recreational experiences, drive the OHV proposals described in the Proposed Action (D) and Alternative C. These proposals include designating a majority of BLM-managed lands as limited to OHVs, with site-specific limitations to be determined in implementation level planning. Please also see responses to comments 4-2 and 9-2 under Off-Highway Vehicles.
33 - 22	We recommend the Bureau consider access needs for subsistence uses other than hunting when developing an implementation-level plan for off-highway vehicles.	Thank you for your comment. BLM will consider access needs relative to all subsistence uses during implementation-level planning.
33 - 45	<p>4.3.1.3.1 Direct and Indirect Effects Common to All. Alternatives for Water Resources Page 4-21, and 4-49, Off-highway Vehicle Effects on Vegetation and others.</p> <p>We recommend the Bureau cite actual studies that document off-highway vehicle damage to vegetation instead of an advocacy report on off-highway vehicle damage. There are many studies in peer-reviewed academic journals that document off-highway vehicle damage to vegetation.</p>	Additional references that document OHV damage to vegetation have been added to Sections 4.3.1.3.1 and 4.3.1.6.2 in the Proposed RMP/Final EIS.
39 - 3	If the BLM wishes to co-operate with the Knik recreational ORV sacrifice zone, at least there should be a mandatory pressure wash of dirty vehicles and trailers before and after use to prevent parasite transfer between watersheds that is facilitated by mud transfer.	Thank you for your comment; however, BLM believes this requirement would not be practicable.

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
42 - 14	Like the BLM, we are very concerned about the threats to public safety and the ongoing environmental degradation in the Knik River Flats area, largely due to uncontrolled high OHV use.	Please see responses to comments 4-2 and 9-2 under Off-Highway Vehicles.
54 - 8	The lack of trail inventory and assessment on BLM lands requires a more conservative approach than the "generally allowed uses on state land" on "existing roads and trails" that is proposed. The current level and quality of ORV use in this area is not sustainable and is causing substantial degradation of fish, wildlife and recreational resources.	BLM agrees that accurate and up-to-date trail assessment and inventory is necessary before trail designation can occur. Additionally, the PRMP/FEIS recognizes the impacts to natural resources from unregulated OHV use (see Chapter 4). Such documented resource impacts, combined with the need to continue to provide for a diversity of recreational experiences, drive the OHV proposals described in the Proposed Action and Alternative C. These proposals include designating a majority of BLM-managed lands as limited to OHVs, with site-specific limitations to be determined in implementation level planning.
54 - 9	We ask the BLM to inventory, analyze and assess current ORV use, and designate specific trails for ORV access that will not degrade resources. This would involve closing all lands to ORV use except for designated, posted trails.	See response to comment 54-8 under Off-Highway Vehicles.
72 - 3	OHV use should be limited to vehicles less than 1000 lb.	On 17(b) easements, there is currently a 3,000 pound GVW limit for OHVs on 25-foot wide trail easements. It is the intent of BLM under implementation-level considerations to apply weight limits to some specific trails. These will be determined based on other factors such as resource considerations or maintenance of recreation experiences. Consultation will take place with Native corporations, other land managers and the public.
79 - 3	OHV Use- My specific comments on OHV use are based upon my experiences with the impacts from such activities. While there is a portion of the community that wishes to recreate in such a manner, I find it difficult to legitimize any expansion in this regard due to the myriad impacts from such activities, and would strongly counsel for Alternative C in this regard.	Please see response to comment 4-2 under Off-Highway Vehicles.

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
85 - 9	<p>However, I am deeply concerned that should the pending state legislation be enacted, the primary goal of which is to create a public use area for ATVs, BLM will end up creating and managing this SRMA for that same purpose in accordance with its general policy of managing its lands in a fashion comparable to neighboring landowners. This would be intolerable in light of the fact that many folks in the area have used the area for nonmotorized recreation and want to continue to have such opportunities and, moreover, BLM has the legal responsibility to manage its lands to accommodate all users.</p>	<p>BLM is committed to involving all interested parties in the planning process including the neighboring landowners, as well as communities, recreationists, and conservation groups. BLM is required by FLPMA to manage public lands for multiple uses, and the Proposed RMP/Final EIS intends to provide the guidance to uphold this mandate. Through implementation level activities and planning, BLM will manage to maintain a range of recreation opportunities, for both motorized and non-motorized users, in addition to working with all of the interested parties in an effort to minimize user conflicts.</p> <p>Please also see response to comment 11-4 under Off-Highway Vehicles.</p>
85 - 10	<p>I also believe designation of the area as a SRMA and providing a balance between motorized and nonmotorized opportunities would provide an excellent case study to examine how the RAC, or its OHV subgroup, could work cooperatively with BLM on issues on resource management.</p>	<p>Please see response to comment 85-9 under Off-Highway Vehicles.</p>
85 - 12	<p>Finally, I wish to object to BLM's adoption of the state's "Generally Allowed Uses on State Lands" as its definition of "limited". The major objection is that the evidence on the ground, massive trail proliferation, indicates that the state's policy does not work on general state lands.</p>	<p>Please see response to comment 17-8 under Coordination and Compatibility.</p>
85 - 14	<p>I recommend that BLM adopt the policy in question without the "whenever possible" phrase for the special use areas in which subsequent OHV implementation planning will occur. That would limit OHV use to trails in existence on the date the ROD is signed, would signal to the public that BLM does intend to manage OHV activity on the lands it manages and would provide a level of protection until implementation planning for that area has been completed.</p>	<p>Thank you for your comment; however, BLM recognizes the State's definition of limited, which restricts OHV use to existing roads and trails whenever possible. Currently there are no OHV use designations on BLM-managed lands within the planning area (Table 2.3-4 of the Proposed RMP/Final EIS). A more conservative approach to OHV management is proposed under Alternatives C and D, where OHV use in all areas within the planning area would be designated as "limited" use areas. Implementation of limited use area designations for OHVs would be effective immediately after signature of the decision record. Additional or site-specific Travel Management Planning will be addressed within implementation-level plans, such as ACEC or Special Recreation Area Management plans, which are produced after the Proposed RMP/Final EIS, and include public involvement.</p>

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
87 - 4	Please review the attached maps for the general locations of these activities within Lake George National Natural Landmark. Damage we observed include: Erosion to stream banks and the dunes due to excessive tearing up of the vegetation by ORVs and 4x4s, and the uncontrolled cutting and subsequent burning of trees near the high water mark. Many of these trees have been feeled with bullets. Springs above the wetlands have been destroyed by ORVs. The "vegetative mat" in the wetlands has been criss-crossed and gouged by ORVs, airboats and 4x4s.	BLM acknowledges the damages in this area. Consistent with its OHV management objectives, BLM will ensure protection of natural resources from OHV impacts through various means such as trail inventory and monitoring and use of existing trails whenever possible (see 2.3.5 of Proposed RMP/Final EIS). Specific operating procedures related to OHVs can be found in the ROPs in Appendix D. Also, designation of the proposed Knik River SRMA (see Table 2.3-4 of the Proposed RMP/Final EIS for a comparison of alternatives relative to OHVs) would have beneficial effects on erosion and sedimentation in the Knik area. Please also see response to comment 4-2 under Off-Highway Vehicles.
87 - 5	Anadromous streams feeding into the wetlands have been diverted or closed off by ORVs.	BLM will assess and manage areas and, if necessary, can use seasonal closures, off-sets and trail designations to mitigate damage to sensitive areas.
87 - 8	The Alaska Department of Natural Resources has continued to issue general "Public Use Permits" for crossing anadromous streams such as Bodenburg, Jim and Friday Creeks. These permits are being abused, as ORV riders consider particularly Bodenburg and Jim Creek as a particular attraction in their motocross recreation. Residents' concerns in the past regarding these permits have not received a response.	While BLM has no authority over permits issued by ADNR, we share your concern regarding intensive recreation use in the Knik River area, including on lands managed by BLM. Also refer to comment 22-13 under Recreation, regarding development of implementation plans for this area.
87 - 9	Two roads (trails) have been added to provide unrestricted access on the north side of Knik River into the wetlands leading to Lake George National Natural Landmark: Jim Creek Trail in 1984/85 and Maud Road Extension to Jim Lake in the early 1990s without providing any management.	Thank you for your comment. Neither of these trails are located on BLM lands in the Knik River area.
110 - 8	We ask the BLM to inventory, analyze and assess current ORV use, and designate specific trails for ORV access that will not degrade resources. This would involve closing all lands to ORV use except for designated, posted trails.	As stated in Section 3.3.10.2 Proposed RMP/Final EIS, "Current AFO management practice includes inventory and documentation of OHV trail development and interim management until OHV use classifications are implemented." Also, as discussed in response to comment 22-9 under Off-Highway Vehicles, the preferred decision for all areas within this plan is to delineate travel management for off-highway vehicle use as "limited." This delineation will limit use to existing roads and trails.

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
112 - 2	<p>We applaud and support BLM's effort to bring their "Limited" designation in-line with the State's "Generally Allowed Uses on State Land" policy. However, in the Ring of Fire RMP draft the definition of "Limited" is often stated as simply "existing trails". In the Alaska Administrative code AAC 96.025, the Alaska State law states "vehicles must use existing roads and trails whenever possible". There are no stipulations defined for legitimate reasons for leaving the trail, only that an existing trail must be used when possible. Where the BLM documentation suggests reasons for leaving the trail, such as noted in section 2.3.5, "If necessary (e.g. game retrieval)", we're concerned this may result in a closed list of acceptable reasons for leaving the trail. We request the document be modified to make it clear that those are only examples and that a specific list of approved reasons for leaving the trail is neither defined nor necessary. In other words, it should be legal to be off the trail when it's not possible to stay on an existing trail regardless of the purpose or destination.</p>	See response to comment 29-2 in Off-Highway Vehicles.
112 - 3	<p>All other State limitations for off-trail use should also apply to protect the vegetation. This consistency with State law is especially important considering the high percentage of Ring of Fire lands that are planned to be conveyed to the state.</p>	<p>Thank you for your comment. As discussed in Section 1.6 of the Proposed RMP/Final EIS, "BLM planning regulations require that BLM plans be consistent with officially approved or adopted resource-related plans of other federal, state, local, and tribal governments to the extent those plans are consistent with federal laws and regulations applicable to public lands." In assessing and managing areas, BLM can, if necessary, use seasonal closures, offsets, and trail designations to mitigate damage to sensitive areas. BLM may also, during the development of the implementation plan for an area, determine that the area should be managed to allow additional OHV use.</p>
112 - 9	<p>We also do not support the general notion that when one user group claims to be negatively impacted by another user group, the later group should be restricted.</p>	<p>BLM agrees. When determining use restrictions or designations, BLM makes a great effort to look at current and potential impacts to resources and users of an area objectively.</p>

Off-Highway Vehicles

Comment #	Comment	Response
119 - 37	<p>While BLM acknowledged that it must protect natural resources from off-highway vehicle (OHV) impacts, the Draft RMP/EIS did not ensure that BLM will do so. To fulfill its mandate, BLM shall designate all public lands as open, limited, or closed to OHV use "based on the protection of the resources of the public lands." 43 C.F.R. § 8342.1. BLM also must monitor the effects of OHV use as part of its ongoing duty to evaluate the appropriateness of these designations. 43 C.F.R. § 8342.3. If this monitoring reveals that OHVs "are causing or will cause considerable adverse effects upon soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability, other authorized uses, or other resources," BLM must immediately close these areas to OHV use. 43 C.F.R. § 8341.2. See also Executive Order 11989.</p> <p>In the Draft RMP/EIS, BLM conceded that many of the units in the Ring of Fire planning area are "rarely visited by BLM personnel" and "[c]ompliance checks for permitted actions often do not occur." Draft RMP/EIS at 3-166. BLM nonetheless proposed to designate many of these areas open or limited to OHV use without a definite monitoring and enforcement plan. Without such a plan, BLM cannot adhere to its duty to protect resources from OHV impacts.</p>	BLM takes its duty to protect resources from excessive OHV impacts seriously, but limited enforcement funding and personnel are a reality. BLM intends to emphasize educating the public on the benefits of using existing trails, but BLM will also enforce adherence to OHV use restrictions where deliberate OHV use off of existing trails is causing resource damage.
119 - 39	We encourage BLM to set the precedent for pro-active management of OHV use and mitigation of current and future impacts throughout the planning area. The State of Alaska's Generally Allowed Uses (11 AAC 96.025) should absolutely not be the only means by which BLM administered lands are managed, even if they are selected for conveyance to the State. The widespread proliferation of OHV trails and associated resource degradation on State lands is evidence that the State's policy to limit OHVs to existing trails "whenever possible" is simply not an effective management strategy.	The Proposed Action (D) for all areas within this plan is to delineate travel management for OHV use as "Limited". This designation will limit use to existing roads and trails (National Mgt. Strategy for Motorized OHV Use on Public Lands, DOI, January 2001); and provide numerous options for management, based on site-specific trail inventory and assessment and public input during implementation-level planning within the next five years. It is important to note that the BLM does not adopt the State's statute, but adopts policy consistent with the statute. It is the BLM's intent, on State-selected lands, to emphasize education regarding the policy and the benefits of using existing trails, but also to enforce where deliberate OHV use off of existing trails is causing resource damage.
119 - 41	Regardless of which draft alternative is ultimately selected, trails signage, public education efforts, and OHV impact mitigation measures should be implemented immediately, especially within eligible Wild & Scenic River corridors, sensitive wildlife habitats, non-motorized use areas, and all other special management areas discussed within this document.	Site-specific actions, impacts, designations, and mitigation measures regarding motorized and non-motorized activities on BLM-managed lands will be addressed in implementation level planning for Special Management Areas. BLM has committed to completing specific implementation level planning in the next five years.

Off-Highway Vehicles

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 43	Executive Order 11644, which sets forth general federal policy regarding OHVs on public lands, directs federal agencies 'to minimize conflict' among the motorized OHV users and various other users of the lands. In respect for the BLM's multiple use mandate, we appeal to BLM to fulfill its responsibility to the non-motorized users of the public lands within the planning area.	Please see response to comment 85-9 under Off-Highway Vehicles.
119 - 47	Ideally, in the Knik River SRMA, we would like to see BLM close sensitive areas heavily damaged by motorized use and protect critical habitat areas. Seasonal closures would not be effective, especially during the time of Spring break-up, because many of the upland, wetland areas are spring fed, with open water year round.	Please see response to comment 11-4 under Off-Highway Vehicles.
119 - 48	We also have reservations about BLM's proposed "grandfathering" of existing OHV trails in the area.	Thank you, comment acknowledged.
119 - 49	BLM should use caution when allowing OHV use on all current trails, for some trails located in salmon spawning streams already show severe rutting, braiding and damage from OHVs.	Please see response to comment 4-2 under Off-Highway Vehicles.

End of section on Off-Highway Vehicles

Recreation

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
16 - 11	Commercial jet boat tours are damaging to anadromous fish and should be prohibited.	Thank you, comment acknowledged.
22 - 13	3. I would like to take some issue with the 'recreational classes' example in the plan using the Knik area as 'semi-primitive motorized' because the usage level does easily exceed 'moderate' and is definitely accessible to 'most full sized street four wheel drive vehicles' -any and many four wheel drive vehicles do access the upper valley and your lands. On a busy weekend, hundreds of users access BLM property by all means of transportation, up to and including military convoys practicing stream fords in anadromous streams.	BLM shares your concern regarding intensive recreation use in the Knik River area. While we believe that the Recreation Opportunity Spectrum is a useful management tool, it does have its limitations. With its divergent uses, the Knik River area is difficult to classify. However, we believe that the semi-primitive motorized classification best describes the setting. As implementation plans are developed for the area, seasonal closures, trail designations, or other management techniques could be considered to assist BLM to meet management objectives. BLM is committed to work with all interested parties in developing the implementation plan for this area.
25 - 6	Target shooting is a problem in this area. An established target range located in the public use area, such as the dunes, or the area between Mud Lake and Jim Lake on Maud Road would be an ideal shooting area. Time restrictions for target shooting should be considered for the residents of the adjoining area.	BLM shares your concern regarding shooting in the Knik River area. An implementation plan would be developed for the proposed Special Recreation Management Area. Designated shooting ranges or other management techniques could be considered to assist BLM to meet management objectives. BLM is committed to work with all interested parties in developing the implementation plan for this area.
28 - 17	WHEREAS, oil and gas leasing and development and mineral location is incompatible with public recreation and enjoyment of Refuge lands;	Thank you, comment acknowledged. However, BLM is a multiple-use agency and as such, is tasked with considering a variety of proposals on public lands. Site specific mitigation can be accomplished through the application of the NEPA process and through the assignment of ROPS and stipulations, as well as abiding by all federal and state laws and regulations. BLM is currently pursuing transfer of the lands in the Palmer Hay Flats State Game Refuge to the State of Alaska.

Recreation

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
34 - 15	<p>Planning Process Step 4 – Analysis of the Management Situation</p> <p>The intent of analyzing the current management situation is to identify “problems and concerns resulting from the current management, and identif[y] opportunities to manage these lands differently.” See DEIS at 1-10, emphasis added. Since 2002, BLM created and maintained a M&C Area, and allowed increasing levels of helicopter-supported recreation elsewhere in the Haines Block. That is, in addition to the on-going summer helicopter glacier tours and dog sledding based out of Skagway, 5-year heli-skiing permits were issued to two companies in 2002, and a new 5-year heli-hiking permit was issued in 2005. BLM anticipates significant future increases in the next five years. See DEIS at 4-9. Therefore, keeping the existing M&C Area and creating a Special Recreation Management Area (SRMA) to manage for increasing helicopter-supported recreational use is really just continuing current management practices without resolving the problems and concerns relating to existing and increasing recreational use levels, and without identifying any opportunities to manage these lands differently.</p>	<p>An implementation plan would be developed for the SRMA (see Appendix F for specific goals and objectives outlined for the Haines Block SRMA). BLM would work with all interested parties to identify a range of alternatives for management and to develop specific decisions regarding commercial recreation use limits (including helicopter access). The BLM will consider the M&C area at the implementation plan level.</p> <p>Please also see response to comment 80-10 under Recreation.</p>
34 - 35	<p>4) No helicopter permits should be issued in new areas until such time as managers "have the ability, funding, and mechanism to collect adequate population demographic and habitat use data, to properly manage, mitigate, and monitor this activity." Id.</p>	<p>BLM bases permitting decisions on best available data. As is, current data is sufficient to determine if current and future helicopter permit requests should or should not be granted. BLM will incorporate all new applicable data, as it becomes available, in permit determinations. Also, permitted helicopter-supported skiing activities on BLM-managed lands are monitored. One facet of this monitoring is identification of critical Dall sheep and mountain goat habitat. Within these critical areas, helicopters are not permitted to land and are required to maintain horizontal and vertical distances from goats and sheep. BLM is currently analyzing 10 years of mountain goat data from the Haines Block area. This information will be used in the development of an implementation plan for the Haines area. Please also see response to comment 34-27 under DOI/BLM Compliance.</p>
43 - 3	<p>For this reason alone I would like to see heliskiing banned: there really isn't anywhere near Haines where the helicopters can take off and land without disrupting residents... except the airport, which the heliski companies are not interested in. If it is your power to help with this very serious problem, then I urge you to do so.</p>	<p>The BLM understands that Haines residents have several serious concerns about helicopter use in the Haines area. Please refer to comment 34-15 under Recreation regarding development of activity implementation plans for this area.</p>

Recreation

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
62 - 4	Currently Temsco has a number of landings, but there are none left for other operators. I think this management should change and allow for others to enter this business.	Please see response to comment 80-10 under Recreation. As implementation plans are developed, specific decisions regarding commercial recreation use limits (including helicopter access) would be established. BLM would work with all interested parties as these plans are developed.
71 - 5	Residents of Haines voted not to have summer helicopter use. If the BLM designated the land north of Glacier Bay National Park for inclusion in a ACEC/RNA it would help protect this area from summer heli-tourism expansion that some politicians seem so intent on granting against citizen desires.	Please see responses to comments 34-15 under Recreation and 34-27 under DOI/BLM Compliance.
72 - 2	Public lands should remain open to winter use by foot, skis, snowmachine.	BLM's goal is to maintain a diversity of recreation opportunities. The Proposed Action (D) for OHV travel management in all areas within this plan is "Limited." Additional or site specific Travel Management Planning will be addressed and implemented within implementation plans, such as ACEC or Special Recreation Management Plans.
74 - 3	The Goat Monitoring Area has been managed as such for several years. There is a considerable amount of commercial tour helicopter activity on the Skagway side of the area (summer glacier tours). No such activity has been permitted in the monitoring area. The Haines Borough has recently regulated the locations that commercial helicopter tour activity will be permitted in the borough, and has respected and incorporated the monitoring area.	Please see response to comments 34-15, 34-35, and 43-3 under Recreation. Also see response to comments 26-3 in Special Management Areas.
76 - 2	Rural folks here want no commercial recreational helicopter use in the Haines Borough -- on any land. Please limit or eliminated it on BLM land. For the goats and the rural residents.	Please see responses to comments 34-15 and 43-3 under Recreation.

Recreation

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
80 - 9	Heliskiing takes advantage of a time of year in which users and wildlife are not in the alpine glaciated environment that the SRMP represents. I believe that helicopter activities should be allowed to continue at current levels without the advancement of alternative D. I do believe that activities need to occur outside of current winter goat habitat and should end in late April. This insures that industry can utilize the full winter months and have a prosperous season.	The lands in the Haines Block containing Special Recreation Permits are being designated as a Special Recreation Management Area. The subsequent implementation plan for the area will address the affected resources, including mountain goats.
80 - 10	If Alternative D in the preferred by the BLM, then objectives should be met to maintain helicopter access and use at current and past levels.	Thank you, comment acknowledged. The PRMP/FEIS lays the groundwork for determining what level of commercial recreation use might be appropriate.
80 - 11	I believe that the BLM needs to be aware that tours that originate in Skagway and land inside Haines Borough boundaries should be liable for taxation in the Haines borough. An example would be Temsco helicopters summer operations landing in the Chilkat and portions of the Ferebee Glacier. These landing should generate revenue for the Haines borough.	Data from the Special Recreation Permits, such as landings and visitor use levels, are available for public inspection. The Haines Borough may request this information annually for its taxation purposes.
83 - 3	I would caution however not to let heli ski operations run large volumes of people especially in summer. It is these large volume operations like in Juneau that really, I think, can have an impact at least on the noise quality of an area.	Please see responses to comments 34-15 and 43-3 under Recreation.
85 - 8	I find zero reference in the entire draft RMP/EIS to the provision of nonmotorized recreation; the final RMP/EIS needs to make a clear reference to the provision of balanced recreational management.	BLM's goal is to maintain a diversity of recreation opportunities. The preferred alternative sets the stage to proactively manage to maintain a range of recreation experiences, particularly on lands managed long-term by BLM. See response to comment 17-2 under Special Management Areas.

Recreation

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 9	There is significant need for a new and innovative supply of recreation opportunities and conservation system units to help meet the demands of the current and future population of Alaska and to strengthen the expanding tourism sector, which is critical to the state's economy.	Thank you, comment acknowledged. BLM considers applications for Special Recreation Permits on a case-by-case basis. BLM is also attempting to finalize land selection and transfers so that the public lands may be managed to meet public interests.

End of section on Recreation

Renewable Energy

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
43 - 21	Do please make sure that no power generation is allowed anywhere in the watershed; this would be most inappropriate as things now stand.	BLM shares your concern regarding potential impacts to fish and wildlife resources. Any proposed renewable energy development project would be developed in accord with the NEPA process.
119 - 134	While our organizations support utilizing renewable energy resources, we do not support the development of an energy resource that may cause damaging impacts to critical fish and wildlife resources. For example, wind resources may not be appropriate to develop in areas such as the Cold Bay BLM lands because of the presence of Steller's Eider.	Please see response to comment 43-21 under Renewable Energy.
119 - 135	<p>Wind Power</p> <p>Alaska has some of the best wind resources in the nation. A recent study commissioned by the State of Alaska¹⁷ concluded that about fifty villages have wind resources that could be successfully exploited. Below is a draft version of a high resolution map of the wind resources across Alaska. The final version will be available in February of 2006 on the Alaska Energy Authority (AEA) website. The AEA website has current detailed reports on the wind resource potential for villages across the state.</p> <p>Rural Alaska Energy Plan, prepared by MAFA in collaboration with Northern Economics, Inc., for the Alaska Energy Authority and the Alaska Industrial development and Export Authority, 2003.</p> <p>As is evident from the map, many of those villages are within the Ring of Fire planning area. Wind resource potential is characterized by the Department of Energy (DOE) National Renewable Energy Lab in seven wind classes. Any resource classified at 3 or above is considered to be developable, with a "Class 7" resource being the best. Alaska has a majority of the Class 7 wind resources in the United States. Most of these wind resources are located at or near the coasts, where most of Alaska's population also lives.</p> <p>The Aleutian Islands is the largest area of high wind power in the country. In the Beaufort Sea and Chukchi Seas coastal and offshore areas, wind power on the average is measured at Class 5. Most coastal areas of the Bering Sea have Class 5 or higher wind power. In the Yukon-Kuskokwim Delta, wind power of Class 5 extends inland up to 150 kilometers. The entire Alaska Peninsula, which is located within the Ring of Fire planning area, has wind power over Class 5, with most areas west of 162°W longitude having Class 7. Lower Cook Inlet also has high wind power potential, primarily in the area from Iliamna Lake to Kamishak Bay.</p>	BLM shares your concern regarding research and development of renewable energy resources. Text applicable to the Ring of Fire planning area has been added to Chapter 3.

Renewable Energy

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 136	<p>Geothermal</p> <p>Below is a map from the AEA website of the geothermal resources across the state. The dots illustrate geothermal "hot spots."</p> <p>Alaska has a high level of tectonic activity that guarantees major geothermal resources. There are over 140 hot springs and 40 active volcanoes in Alaska.¹⁸ Most of the volcanoes form the Alaska Peninsula and Aleutian Islands, which run from Southcentral Alaska for nearly 1500 miles southwest across the International Date Line. Several of these volcanoes are relatively close to Anchorage, across Cook Inlet. These areas are included in the Ring of Fire Planning Area.</p> <p>In 2003, the AEA, with the assistance of DOE and its contractors, completed an assessment of geothermal resources in Alaska. That assessment followed up on work performed in the 1980s. It identified two geothermal sites that have a high potential for development as energy sources. Those sights are on Akutan Island in the eastern Aleutian Archipelago, 766 miles southwest of Anchorage, and Mt. Makushin, near Dutch Harbor on Unalaska Island, about 35 miles from Akutan.</p> <p>Other sights with geothermal potential include Chena Manley, and Circle Hot Springs north and west of Fairbanks in Interior Alaska; Tenakee Hot Springs near Juneau, Mt. Edgecumbe Volcano and Goddard Hot Springs near Sitka, and Bell and Bailey Hot Springs near Ketchikan, all in Southeastern Alaska.¹⁹ Another site may exist near Mt. Sanford, in the Wrangell Mountains. There are also several hot springs on the Seward Peninsula between Nome and Kotzebue that are being studied for potential development, including Pilgrim Hot Springs. Additionally, Mt. Spur has geothermal potential and is located close to the existing transmission lines that run from Beluga Power Plant into Anchorage.</p>	Please see response to comment 119-135 under Renewable Energy.
119 - 137	<p>Electricity</p> <p>Chena Hot Springs is planning its own 400 kW geothermal electric system. The \$1.7 million plant is expected to have a 30-year life. Six other resources in Alaska may produce electricity from naturally occurring hot water: Bell Hot Springs and Bailey Hot Springs (both near Ketchikan); Mt. Edgecumbe volcano (near Sitka); Akutan Island (in the eastern Aleutians); Mt. Makushin (near Dutch Harbor); and Mt. Spurr (near Anchorage). Several of these areas are within the Ring of Fire planning area.</p>	Please see response to comment 119-135 under Renewable Energy.

Renewable Energy

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 138	<p>Biomass</p> <p>Biomass is a renewable energy resource derived from the carbonaceous waste of various human and natural activities. While biomass typically is harvested from plant matter, in Alaska an important source of biomass fuel is fish oil. According to DOE, biomass has been the largest U.S. renewable energy source since 2000. Alaska has enormous untapped biomass potential. Three currently proposed or ongoing projects demonstrate the range of potential biomass material that can be made into useful fuel. They also show quite a geographic range. Those three projects are a gas collection and control system to capture methane at the Anchorage Municipal Landfill; a wood waste to ethanol plant in Ketchikan, which is in the Ring of Fire planning area; and a fish oil biodiesel project at a fish processing plant in Dutch Harbor, which is located near the Ring of Fire planning area.</p>	Please see response to comment 119-135 under Renewable Energy.
119 - 139	<p>Wood Waste to Ethanol</p> <p>Biomass provides the only renewable alternative for liquid transportation fuel, ethanol, which can be used either as an alternative fuel or as an octane-boosting, pollution-reducing additive to gasoline. The U.S. ethanol industry produced more than 2.81 billion gallons in 2003, up 32 percent from 2002's record annual production of 2.13 billion gallons.²⁰ Currently, 72 ethanol plants in nineteen states have the capacity to produce more than three billion gallons annually and an additional fifteen plants are under construction to add over 550 million gallons of capacity in 2004.²¹</p> <p>Advanced Bioethanol Technology allows fuel ethanol to be made from cellulose (plant fiber) biomass, such as agricultural forestry residues, industrial waste, material in municipal solid waste, trees, and grasses. This technology turns ordinary low-value plant materials such as corn stalks, sawdust, or waste paper into fuel ethanol.</p> <p>An innovative potential project is located with in the Ring of Fire planning area. Nova Fuels Company announced in 2004 that it may build an ethanol plant in Ketchikan that will convert wood waste and garbage into about 15 million gallons of ethanol per year. The company may take over the Wards Cove site that Ketchikan Pulp Company formerly occupied. The plant, which would cost an estimated \$60 million, would employ between 35 and 50 people.²² The project could take garbage and wood waste from communities around the region.</p>	Please see response to comment 119-135 under Renewable Energy.

Renewable Energy

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 140	<p>Fish Oil and Biodiesel</p> <p>Biodiesel is an engine fuel manufactured from renewable sources, such as vegetable oils, recycled cooking greases or oils, or animal fats. In Alaska, perhaps the greatest potential source of bioenergy is the biodiesel produced by collecting fish oil at fish processing plants. Shore-based and floating groundfish processors produce approximately 8 million gallons per year of fish oil from as a byproduct of fish meal plants. Much of the oil is used in the process as boiler fuel for drying the fish meal or exported to Pacific Rim markets for livestock and aquaculture feed supplements and other uses. In 2001, with the assistance of AEA and the Alaska Science and Technology Foundation, processor UniSea Inc. conducted successful tests of raw fish oil/diesel blends in a 2.2 MW 2-cycle Fairbanks Morse engine generator. Since then, the company has expanded the operation and used over two million gallons of 50-50 raw fish oil-diesel blend for power production between July 2002 and June 2004.</p> <p>Locally produced fish oil biodiesel blend fuels have the potential to create a sustainable energy supply for use in remote regions of Alaska, yielding dramatic cost savings and reducing dependence on imported petroleum products. Easy-to-manufacture, cleaner-burning fish oil biodiesel blends could potentially replace millions of gallons of traditional diesel fuel now used in rural Alaska.</p>	Please see response to comment 119-135 under Renewable Energy.
119 - 141	<p>Harnessing Tidal and Wave Energy</p> <p>Alaska has one of the nation's top tidal energy resources and over half the nation's potential tidal wave energy. Much of this is located within the coastline of the Ring of Fire planning area. Alaska has twice as much coastline as the rest of the United States and tidal fluctuations that could some day be used to produce power. These fluctuations are present near Anchorage (Turnagain and Knik Arms), Prince William Sound, and Lower Cook Inlet near Homer.</p> <p>So far, only the tides near Cordova in Prince William Sound have been studied seriously for their tidal power potential. A study funded in part by AEA found that a six-megawatt tidal power facility near Cordova was technically feasible. However, during the study period, the City of Cordova elected to invest in a conventional hydro plant, thus eliminating the need for more power generation. The Cordova study also found that if the project did not have additional financing, i.e. a subsidy not uncommon to rural power projects, it would not provide a rate of return that would attract private investors. The company that was interested in developing the Cordova tidal plant, Tidal Electric Alaska, remains interested in other potential sites. This small-scale tidal technology may well prove achievable for smaller coastal communities if the right financing and/or incentives are present.</p>	Please see response to comment 119-135 under Renewable Energy.

End of section on Renewable Energy

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 60	<p>ROP Hazardous Materials and Waste Handling (page D-11, Haz 13).</p> <p>Please modify this stipulation to conclude with the words - "unless approved by AO". This would make it consistent with the stipulation above, and would be more consistent with how the state deals with temporary fuel storage facilities.</p>	Agreed. Haz 13 on page D-11 will now read: Fuel storage will not occur closer than 100 feet from any river, lake, stream, or wetland unless approved by AO."
33 - 61	<p>Standard Lease Terms, Section 7, Mining operations</p> <ul style="list-style-type: none"> · To the extent that impacts from mining operations would be substantially different or greater than those associated with normal drilling operations, lessor reserves the right to deny approval of such operations. <p>The above ROP appears to be an example of a previous ROP originally associated with oil and gas development. The State suggests that it is reasonable to assume that the impacts from a mining operation would be substantially different and greater than those associated with mineral exploration drilling. The impacts from a proposed mining operation should be evaluated and minimized through the Plan of Operations Approval process, but they will likely be greater than those associated with the drilling of an exploration drill hole. It is not reasonable to expect mining companies to invest capital in mineral exploration if they cannot expect to develop the mineral resources. The State suggests that this section be deleted.</p>	Agreed. BLM is presently working to develop a ROP for this Standard Lease Term that is more specific to mining operations.
34 - 31	We are concerned that the DEIS stipulation that helicopters maintain 1/2-mile horizontal and 1500-foot vertical distance from mountain goats does not sufficiently protect goats.	Based on monitoring information and identification of critical Dall sheep and mountain goat habitat (see response to 34-33 under ROPs and Stipulations), we believe that the horizontal and vertical distances described in FWH 16 are sufficient.
34 - 32	We are also concerned that the vague wording that heli-ski landings or skiing will not be permitted in critical ranges as identified by ADFG maps and refined by monitoring, does not adequately protect goats. See Appendix D at 5.	Please see response to comment 34-31 under ROPs and Stipulations.

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
34 - 33	<p>We instead request BLM adopt the Northern Wild Sheep and Goat Council's (NWSGC) recommendations in the Ring of Fire management area:</p> <p>1) Helicopter activity should avoid occupied or suspected nursery habitats and critical winter range by 1.5 km during critical periods (November 15 through April 30th for winter habitat and May 1 through June 15 for nursery habitat).</p> <p>2) These restrictions would "require identification and mapping of mountain goat habitats and identifying exclusion zones ~ to the issuance of annual or multi-year helicopter recreation special use permits." See NWSGC recommendations, original emphasis.</p>	<p>Developing specific use limit windows for helicopter (or other commercial recreation activities) for a given area includes characterizing the area's user, knowing their tolerances for certain activities, and setting limits based on those tolerances; along with consideration of resource impacts, economic impacts, and safety concerns. To make those decisions at this level of planning would be arbitrary and capricious. Permitted helicopter supported skiing activities on BLM-managed lands are monitored. One facet of this monitoring is identification of critical Dall sheep and mountain goat habitat. Within these critical areas, helicopters are not permitted to land and are required to maintain horizontal and vertical distances from goats and sheep. Please also see response to comment 34-11 under DOI/BLM Compliance.</p>

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
42 - 16	<p>EPA recommends the following improvements to the ROPs and lease stipulations in order to minimize adverse environmental impacts and provide more effective mitigation:</p> <p>Effectiveness of ROPs and stipulations. While many of the ROPs and stipulations included in the Ring of Fire Draft RMP/EIS should provide adequate environmental protections, there are others that may not be as timely or effective as expected due to vague wording, insufficient or ill-defined decision criteria and exception clauses. It is especially difficult to predict the effectiveness of mitigation measures that rely on decision criteria that include "whenever possible", "where possible", "minimize", and "if feasible" phrases. EPA is concerned that the use, monitoring, and enforcement of some of the ROPs and stipulations as they are currently written will not achieve the desired environmental outcomes or mitigation. EPA recommends the BLM clarify and improve language in the ROPs and stipulations (e.g., FWH I, FWH 14) by including measurable performance-based criteria.</p> <ul style="list-style-type: none"> · Agency Coordination and Consultation. The Final RMP/EIS should include specific details to describe how and when resource and regulatory agencies with resource management authorities would be consulted in a timely manner when the ROPs and stipulations are used in decisions that affect those resources. Consultation with potentially affected tribes should also be conducted and documented prior to future decisions that may impact their subsistence or cultural resources. · Basis for Numerical Requirements. EPA recommends that where specific numerical criteria are presented, such as setback distances, buffer zone areas and aircraft altitudes, additional detail be provided to explain how those criteria were developed, in order to predict their effectiveness. Examples include FWH 6, FWH 16 and Water 1. · Monitoring and Enforcement. EPA recommends that a more detailed description of effective monitoring and enforcement of ROPs and lease stipulations be added to the Final RMP/EIS. It is important that monitoring be designed to ensure that information and data directly related to RMP objectives is gathered and reported in a systematic and predictable fashion. Details regarding the elements of monitoring activities, the frequency of monitoring, and mechanisms for modifying the RMP and/or permits, authorizations and leases when monitoring reveals that desired resource protections are not being achieved should be added to the Final RMP/EIS. 	<p>ROPs and stipulations have been developed since the late 1990s through multiple BLM planning efforts, and were reviewed in this planning effort in consultation with the State of Alaska for their applicability to the Ring of Fire planning area. When a site-specific proposal is evaluated by BLM, BLM solicits comments from affected parties. Government-to-government coordination is part of this process. In addition, each proposal is subject to specific NEPA analysis, a portion of which is the development of appropriate mitigation measures. Monitoring and enforcement requirements are included in the implementation of the decision.</p>

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 81	It also must discuss in detail how its Stipulations and ROPs would protect resource values, including subsistence, as well as its plans for enforcing them.	ROPs and stipulations are the minimum guidelines that will be used to ensure that resource impacts will be mitigated, on a site-specific basis, during the NEPA process associated with the Plan of Operations review and approval. Mineral activities will be required to follow BLM 3809 Regulations as well as federal and state laws and regulations. There is flexibility built into the ROPs so that site-specific analysis and subsequent remedial measures will provide mitigation for the particular proposed project. ROPs and stipulations are applicable to all of the authorizations within the Ring of Fire planning area. In addition, the proposals are subject to further NEPA consideration, within which subsistence would be analyzed.
119 - 95	BLM was over-reliant on ROPs — BLM stated that it will not impose conditions after the fact that interfere with a lessee's ability to obtain oil. See Draft RMP/EIS at D-1. Thus, BLM must impose fully protective measures as stipulations. Yet, BLM proposed only seven stipulations, which do not cover all the resources deserving of protection. These seven stipulations seek to protect swan nesting habitat, moose winter habitat, bald eagle nests, caribou calving areas, steep slopes, occupied structures and threatened and endangered species. Many resources such as water, vegetation, fish and other types of wildlife are not included.	BLM manages the lands and the resource values through the NEPA process, which considers the resource values and allows the development of site-specific mitigation and the assignment of ROPs and stipulations as appropriate for the project.
119 - 96	BLM should convert mitigation measures that seek to protect other resources to stipulations attached to any oil and gas and mineral leases to assure that they are enforceable, especially when they have the potential to impair the value of a lease. For instance, to protect water resources effectively it may be necessary to impose setbacks, such as those contained in ROP Water 1. A company interested in leasable minerals, however, could argue that these setbacks would make the lease less valuable and therefore should not be imposed. BLM must include this type of mitigation measure as a lease stipulation to assure that it can be imposed later.	ROPs and stipulations are the minimum guidelines that will be used so resource issues will be mitigated, on a site-specific basis, during the Plan of Operations review and approval. Mineral related activities are required to follow BLM 3809 Regulations as well as federal and state laws and regulations. There is flexibility built into the ROPs so that site-specific analysis and subsequent remedial measures will be adapted to the particular proposed project.

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 97	BLM should include stipulations requiring that any oil and gas facilities be dismantled and removed upon completion of production and the land restored to its original condition.	Proper abandonment of Federal oil and gas leases is addressed in the Code of Federal Regulations and in BLM Onshore Oil and Gas Order No. 1. 43 CFR 3108.1 states that before a Federal oil and gas lease is relinquished the lessee is obligated to place all wells to be relinquished in condition for suspension or abandonment as BLM requires; and complete reclamation of the leased sites after stopping or abandoning oil and gas operations on the lease, under a plan approved by the appropriate surface management agency. Onshore Oil and Gas Order No. 1 (Approval of Operations on Onshore Federal and Indian Oil and Gas Leases) requires a drilling plan for each well drilled on a Federal lease. Each drilling plan contains a description of the drilling program and surface use program. The surface use program must include adequate measures for reclamation of disturbed lands no longer needed for either drilling or other subsequent operations. Infrastructure can be very expensive to develop. Upon completion of production, BLM will retain the option of keeping the infrastructure in the event it is needed for other activities.
119 - 102	ROP-F&W 1 (D-4): The requirement to "utilize existing roads and trails whenever possible" does not clarify what situation allows travel over pristine fish and wildlife habitat. This ROP should require a site-specific exception from the Authorizing Officer before allowing off-road or off-trail motorized vehicle travel.	Activities will be mitigated by the Plan of Operations and through the ROPs and stipulations and through the NEPA process, which allows site-specific analysis, identification of impacts, and the development of mitigation measures specific to those impacts. Future locatable mineral development activities will require a Plan of Operations that has to be approved by the AO and which will contain ROPs and stipulations. Mineral related activities will be required to follow BLM 3809 Regulations as well as federal and state laws and regulations.
119 - 103	ROP-F&W 6 (D-4): The setback requirement of 500 feet for roads, well pads, and other oil and gas facilities from fish-bearing waterbodies is insufficient. The setback should apply to all waterbodies, and should be from the "Riparian Reserve" area as defined by EPA for all BLM land. A "conservative riparian reserve width" for fish bearing streams is "the stream and the area on each side of the stream extending from the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance (600 feet total, including both sides of the stream channel), whichever is greatest." This definition leads to a minimum setback requirement of 800 feet from fish-bearing waterbodies, with the possibility that the setback would be greater depending on the characteristics of the waterbody.	Buffer distances are considered by resources specialists to be sufficient, when combined with other ROPs and stipulations to minimize impacts to riparian areas, water quality, and fish and wildlife. This determination was made based on knowledge of local soils and vegetation.

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 104	ROP-F&W 12 (D-4): Other than illegal shooting and natural predation, the U.S. Fish and Wildlife Service lists collisions with powerlines as the major source of trumpeter swan fatalities. ⁶ As such, BLM should prohibit overhead powerline construction rather than allow it to merely avoid primary trumpeter swan breeding habitat.	Thank you, comment acknowledged. Additional restrictions and mitigation measures will be considered when evaluating individual projects, in consultation with appropriate parties.
119 - 105	ROP-F&W 13 (D-4): BLM should not permit recreational developments, permits, or leases on lakes or lakeshores with historically active trumpeter swan nest sites or staging areas unless the lessee or permittee can demonstrate on a site-specific basis that impacts will be minimal or if BLM can determine that there is no feasible or prudent alternative. "Swans will not nest on lakes intensively developed for recreation. For example, trumpeter swans have stopped nesting on Wembley Lake and Crystal Lake in the Grande Prairie area. Management	Thank you, comment acknowledged. FWH 13 on pg D-4 states that recreational developments, permits, or leases on lakes or lakeshores with historically active trumpeter swan nest sites will not be allowed.
119 - 106	ROP-F&W 15 (D-5): BLM failed to show that a quarter mile buffer around bald eagle nests will be sufficient to prevent disturbance. According to the Alaska Department of Fish and Game, "minimizing human disturbance near nest sites is necessary in order to protect Alaska's Bald Eagles from the potential harm caused by increasing human development." This ROP also provided for an "exemption" for mining operations but BLM failed to define that exemption. It also failed to include a ROP for other raptor nests, instead merely stating that "appropriate buffers around other raptor nests will be determined on site-specific analysis." BLM should increase the buffer in this ROP-F&W to at least a half-mile around all raptor nesting sites, with the possibility for site-specific increases depending on circumstances.	The 1/4-mile setback is a recommended setback, and can be adjusted as necessary. When an application comes in, BLM can adjust the setback depending on the site-specific situation.
119 - 107	ROP-F&W 16 (D-5): BLM's decision to limit helicopter landings for skiing but not for other activities is arbitrary. Similarly, allowing helicopters to get too close to sheep and goats that happen to be outside of their critical habitat will potentially disturb large numbers of animals. Helicopters should be required to maintain a minimum distance from Dall sheep and mountain goats regardless of what range they are in, and no heli-landings should be permitted in Dall sheep or mountain goat critical habitat regardless of what activity the helicopter is engaged in.	Helicopter activities that require a permit are subject to NEPA analysis. This includes site-specific analysis, identifying potential impacts, and developing appropriate mitigation measures.

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 108	ROP-Water 1 (D-5): Please see the comments for ROP-F&W-a-6 as to why a 500-feet setback from fish-bearing waterbodies and a 100feet setback for non-fish-bearing waterbodies would be insufficient.	Please see response to comment 119-103 under ROPs and Stipulations.
119 - 109	ROP-Water 3 (D-6): Diverting streams around mining operations will cause severe degradation to riparian areas. BLM should not allow mining activities in sensitive riparian wildlife and fish habitat. This includes riparian areas that are important to migratory birds, as well as the Mentasta and Alaska Peninsula caribou calving areas and critical salmon spawning habitat.	Please see responses to comments 119-95 and 119-96 under ROPs and Stipulations.
119 - 110	ROP-Water 6 (D-6): The requirement that all roads etc. will be sited in upland areas if possible needs to be clarified to address when a road may be sited outside of an upland area, e.g., in a riparian area. This ROP should require an exception from the Authorizing Officer before allowing a road, bunkhouse, office, equipment-storage or maintenance facility to be sited in a riparian area.	Please see response to comment 119-102 under ROPs and Stipulations.
119 - 111	ROP-Water 8 (D-6): BLM should require riparian vegetation to be re-established using native species, and the area should be managed for noxious weed infestations.	Veg2 on page D-8 states that vegetation treatments will be designed to prevent introduction of noxious weeds. Veg14 also on page D-8, states that in extreme cases where seeding or plugging may be necessary, use native vegetation and seeds. In addition a rehabilitation plan would be developed, working with the AFO biologists and botanists (Veg14). Soils 9 on page D-3 requires that disturbed areas be revegetated through seeding of native seed, and Soils10 directs that native species must be used; use of non-native vegetation must have specific approval from the AO.
119 - 112	ROP-Water 11 (D-6): Please see the comments for ROP-F&W 6 as to why a 500-feet setback from fish-bearing waterbodies and a 100-feet setback for non-fish-bearing waterbodies is insufficient.	Please see response to comment 119-103 under ROPs and Stipulations.

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 113	ROP-Wetlands 2 (D-7): "Wetlands are considered valuable because they clean the water, recharge water supplies, reduce flood risks, and provide fish and wildlife habitat. In addition, wetlands provide recreational opportunities, aesthetic benefits, sites for research and education, and commercial fishery benefits." ¹⁰ According to a 2001 BLM report describing the status of lands in central Alaska, "[w]here [ATV] trails traverse permafrost and wetland terrain, glistening dark scars contrast starkly with the natural green and rust colors of the tundra. Trails crossing wetlands are often in excess of thirty feet wide. Heavy rutting is common." ¹¹ Thus, road or trail construction in wetlands should be prohibited, not merely avoided.	Please see response to 119-103 under ROPs and Stipulations.
119 - 121	BLM must include specific requirement in all mineral extraction leases and permits to ensure that each lessee and permittee prevents any damage to the environment or to public or private property. It also should include specific requirements designed to prevent hazards to public health and safety.	BLM considers the management strategies of neighboring land owners and, when determined appropriate, will incorporate those strategies into its management.
119 - 122	Stip-1: A quarter-mile buffer around trumpeter breeding areas is insufficient. Studies have shown that trumpeter swans are sensitive to human disturbances within ranges of up to one and a quarter miles. ¹² Additionally, BLM failed to specify a requirement as to what time period a nest must be abandoned before the Authorizing Officer (AO) may grant an exception based on non-occupancy of nests. BLM should allow no exceptions for oil and gas development within a mile and a quarter of trumpeter swan breeding areas.	The setback distance is a recommended setback, and can be adjusted as necessary. When an application comes in, BLM can adjust the setback and seasonal restrictions as necessary, depending on the site-specific situation.
119 - 123	Stip-2: BLM must clarify what constitutes "actual moose use of site-specific areas" and what type of "review and monitoring" of those areas is required before it will grant an exception. The AO should be required to perform systematic monitoring for a period of three years before granting an exception based on non-occupancy.	BLM manages the lands and the resource values through the NEPA process, which allows the development of site-specific mitigation and the assignment of ROPs and stipulations as appropriate for the project. Monitoring to determine the success of the mitigation measures, and the ROPs and stipulations is part of the overall process.

ROPs and Stipulations

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 124	Stip-3: BLM should prohibit any disturbances within a half mile of nests sites, particularly if there is a direct line of sight between the nest and the activity. BLM should not allow exceptions for nests that have been unoccupied for three consecutive years. "Bald Eagles frequently re-use nest structures . . . often for a period of many years." Similar stipulations should apply to swan nests.	Please see response to comment 199-122 under ROPs and Stipulations.
119 - 125	Stip-4: BLM should ensure caribou calving grounds receive year-round No Surface Occupancy stipulations, not merely seasonal limitations.	BLM manages the lands and the resource values through the NEPA process, which allows the development of site-specific mitigation and the assignment of ROPs and stipulations as appropriate for the project. The seasonal limitation is a recommended limitation, and can be adjusted as necessary. When an application comes in, BLM can adjust the restrictions as necessary, depending on the site-specific situation.
119 - 126	Stip-6: BLM's setback distances in this stipulation are patently inadequate.	Buffer distances are considered by resources specialists to be sufficient, when combined with other ROPs and stipulations to minimize impacts to the human environment. Also see response to comment 119-121 under ROPs and Stipulations.

ROPs and Stipulations

Comment #	Comment	Response
119 - 129	<p>In responding to BLM's Draft East Alaska RMP/EIS, EPA expressed specific concerns with the effectiveness of BLM's proposed ROPs and Stipulations for surface disturbing activities. EPA focused on BLM's future management of lands that it planned to open to mineral leasing and extraction and oil and gas exploration, development and production: "Many of the ROPs and stipulations included in the Draft EIS may not be as timely or effective as expected due to vague wording, insufficient or ill-defined decision criteria and exception clauses and stipulations,"</p> <p>EPA then made the following recommendations:</p> <ul style="list-style-type: none"> - Agency Coordination and Consultation. The Final EIS should describe how and when resource and regulatory agencies with resource management authorities would be consulted in a timely manner when the ROPs and stipulations are used in decisions that affect those resources. For example, consultation with U.S. Fish and Wildlife Service should occur prior to determining bald eagle nest buffers as described in ROP-F&W-b-4 and that requirement should be included in the ROP. Consultation with potentially affected tribes should also be conducted prior to future decisions that may impact their subsistence or cultural resources. If this consultation was designed as part of the Memoranda of Understanding (MOUs) that were described in Chapter V of the Draft EIS, additional detail to explain that process would be helpful. - Basis for Numerical Requirements. EPA recommended that where specific numerical criteria were presented, such as setback distances, buffer zone areas and aircraft altitudes, additional detail should be provided to explain how those criteria were developed in order to predict their effectiveness. For example, justification for choosing the 500-foot buffer distance for fish-bearing rivers and lakes in ROP-F&W-a-6, ROP-Water-a-1 and other ROPs should be included. - Monitoring and Enforcement. EPA recommended that a description of effective monitoring and enforcement of ROPs and lease stipulations be added to Appendix III in the Final EIS, or appropriate references to monitoring and enforcement details that were contained in the main text of the EIS should be inserted. <p>EPA also questioned the effectiveness of BLM's ROPs in sensitive habitat in Alaska considering their unproven track record: The rationale in the Final EIS does not support the choice of the new proposed Preferred Alternative, which relies upon experimental and unproven stipulations and ROPs as performance-based mitigation measures. Mitigation measures and management techniques should have a proven track record before we rely on them to protect the environmentally sensitive areas. The potential for impacts could be significantly reduced by gradually phasing in the leases in environmentally sensitive areas after the effectiveness of stipulations and ROPs have been demonstrated in less sensitive areas.</p>	<p>BLM agrees with the suggestion to consult with tribes on actions that may impact subsistence or cultural resources. Section 810 of ANILCA requires that BLM review all land use decisions to determine if they "may significantly restrict" subsistence uses. If so, then public notice, a hearing and additional administrative determinations to minimize impacts are required. The BLM will continue to comply with the requirements of Section 810 of ANILCA.</p> <p>Consultation with USFWS is required under Section 7 of the Endangered Species Act prior to initiation of any project by the BLM that may affect Federally listed or endangered species or its habitat. The bald eagle is not listed as threatened or endangered in Alaska. BLM utilized information from USFWS to determine bald eagle nest buffer distances. A 500 foot buffer from fish-bearing streams, rivers or lakes was considered by resource specialists to be sufficient, when combined with other ROPs and stipulations, to minimize impacts to riparian areas, water quality, and fish and wildlife. This determination was made based on knowledge of local soils and vegetation.</p>

(Source: March 3, 2005, letter from Michelle Pirzadeh, EPA Region 10 Director of Office of Ecosystems, Tribal and Public Affairs, to Henri Bisson, BLM Alaska State Director, on the

Final Amended Integrated Activity Plan/Environmental Impact Statement (Final EIS) for the Northeast National Petroleum Reserve-Alaska (NE NPR-A).)

We were surprised to find that the ROPs and stipulations in Appendix D of the Draft Ring of Fire RMP/EIS were nearly identical to the Draft East Alaska RMP/EIS and that BLM ignored EPA's criticisms. BLM must consider the EPA's suggestions in this Draft RMP/EIS, and in each forthcoming draft RMP/EIS, including the Bay RMP, Kobuk Seward RMP, and South NPR-A Integrated Activity Plan (IAP).

End of section on ROPs and Stipulations

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
7 - 3	The first thing I would like to comment on is the proposed Knik Special Recreation Management Area, in Alternative C and D. I fully -- Alaska Coalition fully supports a designation of the Knik River as a Special Designation Management Area.	Thank you, comment acknowledged.
7 - 9	The third comment I want to make is on the Neacola proposed ACEC. I've done personal mountaineering trips and guided mountaineering in the Alaska Range before, and I think that the Neacolas could offer some great guiding opportunities; however, I think ACEC is an appropriate designation that could work with potential guides and operators.	Thank you, comment acknowledged. The Proposed Action would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC.
8 - 3	I think the one thing that hasn't been mentioned, as I look at the list of things of the SRMA, and I noticed that it was considered on one of the other areas as sort of an item of -- sort of the quality-of-life impacts.	BLM intends to further define the management of the units through development of implementation plans which incorporate the goals stated in Appendix F.
8 - 5	There are some high-use areas that also are very residential areas, and that's an important consideration.	BLM intends to further define the management of the units through development of implementation plans that incorporate the goals stated in Appendix F in the Proposed RMP/Final EIS.
12 - 3	We are happy to see that the BLM's preferred alternative supports a proposed Knik River special recreation management area. The BLM -- the BLM lands at the headwaters of the Knik River watershed could and should be a world-class recreational destination, but it is important that these lands are properly managed and that OHV use is contained to appropriate areas. We agree with the preferred alternative and the BLM that the BLM should closely manage OHV activities in the proposed Knik River SRMA. This area is currently under heavy pressure from unregulated OHV use, and any management and any planning would be very welcome. We would also look forward to being part of this planning process for the Knik River area.	Please see response to comment 11-4 under Off-Highway Vehicles.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
12 - 7	<p>My final point is I'd like to support the Neacola Mountains ACEC. ACE supports this designation for the protection of these scenic Neacola Mountains and I hope to this summer have on-the-ground knowledge of this scenic area.</p>	<p>Please see response to comment 7- 9 under Special Management Areas.</p>
13 - 2	<p>The ACEC that's proposed for this area is fantastic, and we definitely strongly support that management designation. We hope that it will be managed in accordance with the adjacent National Park Service land and the guidelines that they have set forth for their areas. Hopefully, that can be cooperatively managed.</p>	<p>Thank you, comment acknowledged. The Proposed Action would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC. In the implementation plan that will be used to develop specific management measures for the ACEC, BLM will coordinate closely with the neighboring NPS land managers and attempt to be as consistent in our management as allowed by our policies.</p>
13 - 3	<p>And I was also looking at -- I know there has been a little bit of concern about whether ACEC is an appropriate designation for this area. So I did a little searching around and found that there is a national scenic area, which is a non-NLCS site, and I believe it's in Oregon. And I want to recommend that that sort of designation could also be considered for the Neacola Mountains since the primary goal within that area is to protect the scenic values and to enhance them, keep them as they are for the future.</p>	<p>The Columbia River Gorge National Scenic Area was created by a special act of Congress (P.L. 99-663 November 17, 1986 100 Stat.42 76). BLM examined the available designations and determined that the assignment of an ACEC designation was most appropriate for the Neacola Mountains.</p>
14 - 6	<p>And just my final comment is on the Knik River area. The purpose of the State's actions there is to actually set up a management process, and the motorized users have been quite instrumental in that in getting that process moving forward in a way that they are comfortable that they won't throw out the baby with the bath water. But it is very much -- the idea there is to get rid of the riffraff, to be able to have an enforcement mechanism, to educate users, and we see that very compatible with the special management area that you have designated in that location.</p>	<p>We intend to further define the management of the Knik River SRMA through the development of an implementation plan, which will incorporate the goals (stated in Appendix F) for the Knik River SRMA.</p>
16 - 2	<p>Monitoring in this area should be expanded to focus on helicopter impacts to other species known to be sensitive to such intrusions, such as wolverine, brown bear.</p>	<p>Any changes to the monitoring focus will be determined during the implementation-level planning process for the Haines Block SRMA, which will occur only after completion of the Proposed RMP/Final EIS.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
17 - 2	<p>However, we find no reference to providing opportunities for non-motorized activity in the entire Plan. (In fact, we found only one mention of the term, on page 4-112.) In particular, we are very disappointed that the Knik River SRMA contains no reference to, or plans for, non-motorized recreation despite the fact that the area is currently used by both motorized and non-motorized recreationists. We are certain that BLM is aware that people who have historically used this area for non-motorized recreation now feel pushed out by the unregulated motorized activity, vandalism, shooting, etc. AQRC believes BLM has the responsibility to provide recreational opportunities for all users of its lands.</p>	<p>Please refer to Appendix F where the Knik River SRMA goals are outlined, including "maintaining existing recreation opportunities." The implementation-level plan for the SRMA will conform to the goals and objectives outlined in the PRMP/FEIS, including maintaining opportunities for non-motorized use.</p>
17 - 4	<p>We request, therefore, that the Preferred Alternative in the Final Plan affirmatively state that one goal of the Knik River SRMA is to provide opportunities for non-motorized users. It well may be that a corridor along the river could be created and designated open to all type of motorized activity without harming the resource, but we would expect many of the upland areas would be damaged by such activity and should be managed for non-motorized activity.</p>	<p>Please see response to comment 17-2 under Special Management Areas.</p>
17 - 7	<p>But if, in fact, BLM intends to create, and manage, the Knik River SRMA strictly for motorized activity, AQRC objects, strongly, to both Alternatives C and D.</p>	<p>Please see response to comment 11- 4 under Off-Highway Vehicles.</p>
18 - 2	<p>Please approve the Area of Critical Environmental Concern (ACEC) for 229,000 acres in the Neacola Mountains -Blockade Glacier area. This is badly needed to protect wild lands and the recreational values that depend on them. Wildlife habitat is important here, and this area is part of the western panorama seen from Anchorage. Nothing should be allowed to impair its natural character.</p>	<p>Please see response to comment 7-9 under Special Management Areas.</p>
18 - 3	<p>We favor the Knik River Special Recreation Management Area that BLM has proposed. My brother saw this area while he was working in Anchorage. BLM should regulate this area to make sure off-road vehicles (ORV) will not damage the fish and wildlife habitat there.</p>	<p>Please see responses to comments 4-2 and 11-4 under Off-Highway Vehicles.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
18 - 5	The Haines-Skagway Backcountry should be protected in an SRMA of 113,000 acres to protect the natural landscape and wildlife. Commercial tours arriving by helicopter and light airplanes are becoming a problem in this area and could damage wildlife habitat, potentially leading to disappearance of the mountain goats that people now enjoy seeing there.	The lands in the Haines Block containing Special Recreation Permits are being designated as a Special Recreation Management Area. The subsequent implementation plan for the area will address the effected resources, including mountain goats. Large portions of the lands surrounding Haines have been selected by the State of Alaska and appear on their priority list for 2006. Title to these lands will be transferred by BLM. The mountain goat inventory data is being analyzed along with other available information, and will be utilized in the preparation of the Haines Block SRMA implementation plan. When compiled and analyzed, the assessment will be made available as a published report.
19 - 2	Specifically we urge: Knik River Special Recreation Management Area should be approved.	Thank you, comment acknowledged.
19 - 6	Haines-Skagway Back country SRMA should be adopted for this 113,000-acre area to provide management that will prevent excessive impacts from commercial tours using helicopters and fixed-wing aircraft. Wildlife values, including mountain goats, should be given secure protection by management prescriptions in this SRMA.	Please see response to comment 18-5 under Special Management Areas.
19 - 7	Neacola Mountains -Blockade Glacier ACEC of 229,000 acres should be adopted to protect the extraordinary natural landscapes found there and the wildlife habitat (especially for bear) and recreational values such as skiing and ice climbing. This is of special value to Anchorage residents because it includes the city's western view panorama. Management prescriptions should give secure protection to this area against all forms of development.	Please see response to comment 7-9 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
26 - 1	<p>I am writing to comment on the proposed management of the "Goat Monitoring and Control Area" in the Haines vicinity. I am pleased to see that the BLM has continued to designate the area as a monitoring area. However, I am concerned to note that the overall management designation for the surrounding area is that of a Special Resource Management Area (SRMA).</p> <p>The Goat Monitoring Area has been managed as such for several years. There is a considerable amount of commercial tour helicopter activity on the Skagway side of the area (summer glacier tours). No such activity has been permitted in the monitoring area. The Haines Borough has recently regulated the locations that commercial helicopter tour activity will be permitted in the borough, and has respected and incorporated the monitoring area.</p>	BLM will consider the Mountain Goat Monitoring and Control Area when we develop the implementation plan for the Haines Block SRMA.
26 - 3	<p>The SRMA designation for the area seems inappropriate. A SRMA is managed "to meet the strategically-targeted primary recreation market demand." (DEIS at 3-174) A more appropriate designation would appear to be that of a Resource Natural Area (RNA), as part of an Area of Critical Environmental Concern (ACEC). An RNA is a particular ACEC that provides for biological diversity and opportunities for research and education. (DEIS at 3-173).</p>	BLM did consider and evaluate this nomination as an ACEC as required by NEPA (40 CFR 1503.1) but did not assign this designation in the Draft RMP/EIS. The PRMP/FEIS elaborates on this consideration in Section 2.2.
27 - 4	<p>Specifically, we request that BLM adopt the proposed special recreation management designation for the Knik River to allow for community-based planning efforts, involving all multiple user groups, to determine the best balance for managing access issues, protecting critical fish and game habitats, and resolving user conflicts.</p>	Please see response to comment 11-4 under Off-Highway Vehicles.
27 - 6	<p>Impacts to salmon spawning streams, trail damage, safety concerns, and illegal dumping are management issues that must be addressed by the Knik River Special Recreation Management Area.</p>	See response to comment 12-4 in Off-Highway Vehicles.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
27 - 9	Game species, such as caribou, moose, bear, salmon, and dolly varden, are known to inhabit or migrate through the upper Chiligan block, and we support protective measures, such as the ACEC designation, which will help ensure sustainable future management of these populations.	The Chiligan Block was considered but not included in the proposed ACEC. BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable law.
28 - 1	Enclosed please find our reasons and recommendations for designating those BLM lands included in the RMP/EIS which lie within the boundary of Palmer Hay Flats State Game Refuge as Alternative C, with additional provision for withdrawal of these lands as an Area of Critical Environmental Concern (ACEC) designation.	BLM considered the nomination of the Palmer Hay Flats State Game Refuge as an ACEC but determined that it would not be an appropriate designation. For further discussion of this issue, please see Section 2.2.
28 - 5	Elsewhere under "General information on land status and management", the RMP/EIS even acknowledges the "outstanding habitat that supports huge flocks of migrating waterfowl, shorebirds, and sandhill cranes, as well as salmon and moose. The Cook Inlet population of beluga whales is also known to use the estuaries adjacent to this area. Because of its proximity to major population centers, this area receives a great deal of recreational use." These statements alone, should Qualify the Palmer Hay Flats State Game Refuge for ACEC designation.	Please see response to comment 28-1 under Special Management Areas.
28 - 10	A RESOLUTION RECOMMENDING THE DESIGNATION OF ALTERNATIVE C OF THE BUREAU OF LAND MANAGEMENT (BLM) RING OF FIRE RESOURCE MANAGEMENT PLAN (RMP) AND THE ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR LANDS WITHIN AND ADJACENT TO THE BOUNDARIES OF PALMER HAY FLATS STATE GAME REFUGE AND THE DESIGNATION OF SUCH LANDS AN AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC).	Please see response to comment 28-1 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
28 - 18	<p>WHEREAS, Alternative C emphasizes protection and enhancement of resource values, with more constrained oil and gas leasing and mineral exploration and development;</p> <p>WHEREAS, Alternative C has identified one Area of Critical Environmental Concern (ACEC), to be withdrawn from consideration for oil and gas leasing and development and mineral location;</p> <p>WHEREAS, the ecological integrity and biological health of lands adjacent to Palmer Hay Flats State Game Refuge affect the integrity and health of the Refuge's wildlife habitat;</p> <p>NOW, THEREFORE, BE IT RESOLVED, that Alaskans for Palmer Hay Flats recommend lands within and adjacent to Palmer Hay Flats State Game Refuge be given Alternative C designation in the BLM Ring of Fire RMP/EIS;</p> <p>BE IT FURTHER RESOLVED, that lands within and adjacent to Palmer Hay Flats State Game Refuge be designated an Area of Critical Environmental Concern (ACEC), closed to any future oil and gas leasing, development and mineral location.</p>	Please see response to comment 28-1 under Special Management Areas.
29 - 4	We support the Knik River SRMA concept as long as its purpose is to manage these lands in the spirit of the pending State Knik River Public Use area legislation.	Thank you, comment acknowledged. As an implementation plan is developed for the Knik River SRMA, seasonal closures, trail designations, or other management techniques could be considered to assist BLM to meet management objectives. BLM is committed to working with all interested parties in developing the implementation plan for this area. BLM will consider the management of the adjoining lands, and attempt to be as consistent in our management as allowed by our policies.
29 - 5	The AOAA believes that SouthCentral Alaska needs a place designated for motorized recreation. The proposed Knik River Public Use Area maintains the Knik River as a suitable destination for motorized recreation. We would like the draft RMP regarding the Knik River SRMA to reflect that purpose as well.	The purpose of the Knik River SMRA would be to maintain a diversity of uses while protecting the area's resources. See response to comment 25-3 under Coordination and Compatibility regarding implementation planning and possible management measures.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
33 - 11	BLM has identified three large tracts of land that, should these lands remain in long term BLM ownership, will benefit from a more focused management approach provided by the designation of Special Management Areas. The proposals will not encumber any state or native selected lands but will provide BLM with the necessary tools to devote additional resources to management through more site specific planning for these areas should they remain in long term BLM ownership.	Thank you, comment acknowledged.
34 - 3	The articulated planning process was not followed for the Haines Block. Due to a multitude of Haines Block deficiencies, it is likely there are similar planning process deficiencies for other geographical areas. We recommend BLM do a Supplemental DEIS (SDEIS) to correct factual errors, supply missing information, explore reasonable alternatives not considered in the DEIS, modify existing alternatives, and supplement and improve the analysis. A SDEIS will give an interested public the opportunity to comment on new information, new alternatives, and new analysis before BLM decides on a final plan.	<p>The Draft RMP/EIS was prepared in accordance with applicable law. We took a hard look at the direct, indirect and cumulative impacts of the decisions that were made. Our actions were in accordance with NEPA, the regulations issued by the Council on Environmental Quality, as well as the Department and our NEPA Handbook, H-1790-1 and other applicable environmental laws.</p> <p>BLM manages lands and resource values through the NEPA process. ROPs and stipulations have been developed, which considers resource values and allows the development of site-specific mitigation as appropriate.</p> <p>The articulated planning process (Chapter 1) will be followed specifically for the Haines Block SRMA during the implementation level planning phase, and the public will have another opportunity to comment.</p>
34 - 5	2) Planning Process Deficiencies BLM failed to carry out the Planning Process (as articulated in the DEIS at 1-10) for the Haines Block.	Please see response to comment 34-3 under Special Management Areas.
34 - 14	We also request that this information form the basis for a range of alternatives to address Haines Block planning issues, as required. See Handbook at 20.	Please see response to comment 34-3 under Special Management Areas.

Special Management Areas

Comment #	Comment	Response
34 - 16	<p>That said, LCC proposed a different management strategy during the 2004 scoping process that satisfies the rigors of the planning process by creating an opportunity to manage BLM lands differently, as intended. That is, we proposed that the current M&C Area and BLM lands north of and adjacent to Glacier Bay, be designated as an ACEC/RNA. This idea was supported by ADFG: "We support the general concept of naming BLM lands in the Haines and Skagway area as a Research Natural Area (RNA)." See June 16, 2004 letter from Polly Hessing to Robert Lloyd. LCC's nomination was also supported by the Alaska Center for the Environment, Alaska Coalition, Alaska Wildlife Alliance, Defenders of Wildlife, Sierra Club Alaska Chapter, Southeast Alaska Conservation Council, and the Wilderness Society. See 2004 ACEC/RNA support letter. Our ACEC/RNA nomination allowed for lands north of the M&C Area to be managed for recreation.</p>	BLM considered an ACEC designation for this area, but determined that it would not be appropriate. For further discussion of this matter, see Section 2.2.
34 - 18	<p>In terms of resolving the major Haines Block planning issue of conflicts between increasing helicopter use and protecting goats and other wildlife, all alternatives in the DEIS are essentially the same, and all resolve the conflict in the same way. That is, BLM currently has a M&C Area, and all other Haines Block land has been open to increasing levels of helicopter recreation. Whether it's designated as a SRMA or not, BLM has managed Haines Block lands as a SRMA by prioritizing increasing levels of helicopter recreation. Alternatives A, B, C, and D in the DEIS would continue that management strategy and provide no variation in levels of resource production or protection.</p>	Please see response to comment 26-1 under Special Management Areas.
34 - 20	<p>3) Modified Alternatives C and D</p> <p>LCC agrees with the DEIS assessment that there is a need for special management in the Haines Block. See DEIS at 4-177. While a SRMA is the appropriate special management tool for recreation, it is an inappropriate and inadequate special management tool for conserving and protecting the special Haines Block wildlife values identified in the DEIS.</p>	BLM considered the nomination of the Haines Block as an ACEC and the remaining lands as an RNA but did not assign those designations in the PRMP/FEIS. The lands in the Haines Block containing Special Recreation Permits are being designated as a Special Recreation management Area. The subsequent implementation plan for the area will address the effected resources, including mountain goats.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
34 - 22	<p>With this mandate to meet demand and the noted anticipated increase in demand for helicopter-supported recreation, BLM would be hard pressed to manage the SRMA for anything but helicopter-supported recreation. That is, there is an inherent conflict between the demand for new helicopter landing areas and protecting an area from the mandated activity. The appropriate special management designation for managing and protecting wildlife is an ACEC.</p>	<p>Please see response to comment 34-20 under Special Management Areas.</p>
34 - 23	<p>A RNA is the appropriate special management designation for managing and protecting an area with "a particularly diverse and unique set of flora and fauna", and especially when research is needed to understand the long term impacts of helicopter activity on goats: "Research to date has not clearly identified thresholds of disturbance that trigger unacceptable responses." See NWSGC Position Statement. The lack of information on goats was recently corroborated by ADFG biologists in Juneau: "When state biologists started wondering whether planned development east of Lynn Canal would effect mountain goat populations, they realized they didn't know much about the animals, period." See November 6, 2005, Juneau Empire, Getting their goat: State biologists to study effects of gold mine, proposed road on mountain goats.</p>	<p>Designation as a SRMA will provide necessary management, and is proposed in the Proposed RMP/Final EIS. Developing use limits for heli-skiing (or other commercial recreation activities) for a given area includes characterizing the area's user, knowing their tolerances for certain activities, and setting limits based on those tolerances; along with consideration of resource impacts, economic impacts, and safety concerns. To make definitive and long-term mountain goat management decisions at this level of data gathering and analysis would be arbitrary and capricious and is what BLM is trying to avoid.</p>
34 - 24	<p>FLPMA requires BLM "give priority to the designation and protection of areas of critical environmental concern." See 43 U.S.C. 1712. Even though BLM is also required to inventory all resources and values, including recreation, recreation does not rise to the level of being prioritized, as do areas of critical environmental concern. Id. at 1711. Since the "best available knowledge" indicates there is strong scientific evidence that goats are subject to disturbance from helicopter activity that might endanger herd viability (see NWSGC Position Statement), BLM cannot legitimately put the existing M&C Area into a SRMA. The NWSGC states "the sensitivity of mountain goats and their habitats call for a conservative approach until we have more comprehensive, science-based recommendations and mitigation measures identified." Id. It is clear that until more research occurs, it is absolutely essential to maintain a viable baseline or reference area protected by an ACEC/RNA designation. A SRMA only guarantees that demand for helicopter recreation will be met.</p>	<p>BLM disagrees. Designation as a SRMA will also provide protection. See response to comment 34-11 under DOI/BLM Compliance.</p>

Special Management Areas

Comment #	Comment	Response
34 - 25	<p>Therefore, the Haines Block should include two SMA's. In the conservation alternative (C), all Haines Block lands would be designated an ACEC, with the M&C Area and lands adjacent to Glacier Bay designated a RNA. The balanced alternative (D) would include a SRMA to protect existing recreational uses in the northern half of the currently designated SRMA, and an ACEC/RNA for the M&C Area and remaining Haines Block lands.</p> <p>These suggested modifications better meet the planning criteria. That is, both the original and modified Alternatives C and D meet criteria #2,7,8,9, and 14. But only modified Alternatives C and D also meet criteria #5 (consistent management with Glacier Bay National Park where helicopter landings are not allowed), #6 (consistent with suggestions made by ADFG, Chilkat Indian Village, and other interested parties), #12 (RNA provides the opportunity and mandate for needed research), and #15 (management to protect the unique flora and fauna as identified in the DEIS for the Haines Block). Modified Alternative D also meets criteria #11 (focus on the relative values of the resources – that is, there is a value for helicopter-based recreation that's recognized in a SRMA and a differing value for wildlife habitat protection that's recognized in an ACEC/RNA). See DEIS Appendix B at 27 and 28.</p>	<p>BLM considered the nomination of the Haines Block as an ACEC and the remaining lands as an RNA but did not assign those designations in the Proposed RMP/Final EIS (see Section 2.2). The lands in the Haines Block containing Special Recreation Permits are being designated as a Special Recreation Management Area. The subsequent implementation plan for the area will address the effected resources, including mountain goats. Large portions of the lands surrounding Haines have been selected by the State of Alaska and appear on their priority list for 2006. Title to these lands will be transferred by BLM. Although BLM has gathered data over an 11-year period, there are no proposals to study the resources by anyone outside the BLM.</p>
34 - 26	<p>4)ACEC/RNA designations are supported by FLPMA and BLM Handbook</p> <p>“Give priority to designating and protecting areas of critical environmental concern.” See Handbook at 11 and 43 U.S.C. 1712. That is, if BLM takes the NEPA required “hard look” and seriously considers concerns expressed by ADFG, NWSGC, and wildlife conservation advocates, they will prioritize the requested ACEC designation as mandated.</p>	<p>BLM disagrees that the Haines Block is an “an area of critical environmental concern.” BLM believes an SRMA designation and the subsequent implementation plan for the area will address affected resources, including mountain goats, adequately while also providing recreation opportunities.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
34 - 28	<p>· "In developing alternatives, the BLM must consider the relative scarcity of the values involved and the availability of alternative means and sites for realizing those values (43 U.S.C. 1712(c)(6))". See Handbook at 22. In our 2004 nomination we made the case that naturally occurring mountain goat populations are a scarce BLM resource outside of the Haines Block. See LCC's 2004 nomination letter. On the other hand, BLM and US Forest Service offer thousands of helicopter landing opportunities for recreational uses along the entire east side of Lynn Canal from Juneau to Skagway. See USDA Helicopter Landing Tours on the Juneau Icefield 2003 – 2007 EIS, and the May, 1995 USDA and BLM Environmental Assessment for Helicopter landing Tours in the Skagway and Haines Area. In addition, BLM offers landing sites from the west side of Skagway to the Canadian border. Id. A BLM SMA to protect wildlife from helicopter-supported recreation is to date non-existent. It doesn't get any scarcer than that.</p>	BLM has considered mountain goat populations and available recreational opportunities in the development of the Draft RMP/EIS and the Proposed RMP/Final EIS, as well as BLM management objectives. BLM will continue to consider the relative abundance/scarcity of these resources and the agency's management objectives when developing more specific management plans for the area in question.
34 - 29	<p>"Designate research natural areas and outstanding natural areas as types of ACECs using the ACEC designation process." See, Handbook Appendix C at 28. As stated previously, the Haines Block is noted for its goat habitat and diverse and unique flora and fauna and is perfectly suited for a RNA. See DEIS at 3-56.</p>	BLM, under Alternatives C and D, proposes a Haines Block SRMA, and believes a SRMA designation, rather than an ACEC designation, would provide the most appropriate management strategy for these lands. See response to comment 26-3 under Special Management Areas.
35 - 2	<p>More specifically, we support:</p> <ul style="list-style-type: none"> · Neacola Mountains designation as an Area of Critical Environmental Concern · Knik River designation as a Special Recreation Management Area · Haines/Skagway Special Recreation Management Area · Management of motorized use region wide to protect wildlife resources and scenic values. 	<p>Thank you, comment acknowledged. The Proposed Action would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC, designate BLM-managed lands in the Knik River and Haines Block areas as Special Recreation Management Areas, and would delineate travel management for off-highway vehicle use as "Limited".</p> <p>The PRMP/FEIS recognizes the impacts to natural resources from unregulated OHV use (Chapter 4). Such documented resource impacts, combined with the need to continue to provide for a diversity of recreational experiences, drive the OHV proposals described in the Proposed Action (D) and Alternative C. These proposals include designating BLM-managed lands as limited to OHVs, with site-specific limitations to be determined in implementation level planning.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
36 - 3	Four of the BLM parcels listed in the nomination fall within the portfolios that we have identified for the Alaska Peninsula and Cook Inlet Basin ecoregions. We encourage BLM to review these parcels and designate them as Areas of Critical Environmental Concern (ACEC), Research Natural Areas (RNA), Outstanding Natural Areas (ONA), or Wild and Scenic Rivers (WSR) as appropriate. Table 1 outlines the key ecological values of each portfolio area and the recommended protection for the parcel within it.	BLM does not think it is appropriate to designate these parcels as an ACEC, RNA, ONA, or WSR. These parcels do not meet the relevance and importance criteria set forth in 43 CFR 1610.7(a) for designation as an ACEC, nor do they meet the criteria for designation as an RNA (see Section 2.2 for further explanation). The parcels do not possess unique scenic, scientific, educational, or recreational values, and they do not meet the criteria for WSR designation.
40 - 1	Regarding your RMP: Create an ACEC/RNA to protect goats.	Please see response to comment 26-3 under Special Management Areas.
40 - 3	1) Diverse and unique resources such as this need protection from increasing heli-recreation, and ACEC/RNA designation will provide this protection.	Please see response to comment 34-27 under DOI/BLM Compliance.
40 - 4	2) The RMP puts existing Goat Monitoring and Control Area into an SRMA with a mandate to meet public demand for heli-recreation. This conflicts with a control area intended to protect goats.	Please see response to comment 34-11 under DOI/BLM Compliance.
41 - 4	The Alaska Miners Association supports Alternative B. We recognize that the preferred alternative (Alternative D) would allow for increased access to lands for mineral exploration and development when compared to the status quo, however, we oppose the proposed designation of an Area of Critical Environmental Concern (ACEC) in the Neocola Mountains. We see no justification for such a restricted area. Most of the federal land in Alaska is already off limits to nearly all development, especially closed to mining. To add any restrictions to the land that remains is not appropriate.	BLM believes the ACEC designation is appropriate. As reported in Table 2.6-1 of the Proposed RMP/Final EIS, mineral development potential in the area is low. The area, however, provides numerous and diverse recreation opportunities and has other recognized values. BLM believes the ACEC is the most appropriate designation to ensure preservation of identified values, outstanding natural scenery, visual resources, scenic values, and existing recreation opportunities of the area. An ACEC designation does not close the area to mineral entry or development. They offer an additional layer of protection to the critical resource that the ACEC was created for. Additional ROPs or Stipulations may be included as part of the NEPA analysis or the Plan of Operations.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
42 - 9	We support the BLM's proposal to designate the Neacola Mountains ACEC, the Knik River Special Recreation Management Area SRMA and the Haines Block SRMA. On the basis of information presented in the Draft RMP/EIS, we recommend that these designations be carried through for the Final RMP/EIS and Record of Decision (ROD).	Please see response to comment 35-2 under Special Management Areas.
42 - 12	Based on information presented in the Draft RMP/EIS, the northern block of the Neacola Mountains may be appropriate for designation as part of the Neacola Mountains ACEC. During the 30-day public comment extension, EPA encourages the BLM to carefully consider additional public input regarding the relevance and importance of the northern block of the Neacola Mountains and its suitability for designation as part of the Neacola Mountains ACEC, and describe the decision-making process and ultimate outcome in the Final RMP/EIS.	BLM did acknowledge and evaluate this nomination as a substantive comment, as required by NEPA (40 CFR 1503.1). The nomination was considered as an alternative, but eliminated from further consideration (see Section 2.2).
42 - 13	We strongly support the BLM's planned efforts to work with federal, state and local agencies; future potential land owners; and the public to prepare activity plans for the proposed SRMAs and ACEC.	The implementation plans for special management areas provide a more focused opportunity for public and agency involvement in developing a more detailed management framework.
42 - 15	We encourage the BLM to continue planning efforts toward an environmentally protective strategy for that area, which 1) defines appropriate trails for OHV travel; 2) includes an effective monitoring and enforcement program; 3) limits or prohibits OHV use in sensitive habitat areas, areas of high value for quiet recreational pursuits and areas where effective monitoring and enforcement cannot be assured; and 4) commits to an effective and timely notification and education effort to inform the public.	Thank you for your comment. BLM will take these recommendations into consideration during the implementation level planning phase for the Knik River SRMA.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
43 - 12	I live on the Chilkoot River. In the Ring of Fire presentation the Chilkoot drainage was suggested for a possible Wild and Scenic River designation. That would be excellent but I would also suggest that the Research Natural Area might be even better.	The Chilkoot River drainage is included in the Haines Block SRMA proposed under Alternatives C and D in the Proposed RMP/Final EIS. BLM considered the nomination of the Haines Block as an ACEC and the remaining lands as an RNA; however, BLM chose to assign the SRMA designation. In the interim, the State's Recordable Disclaimer of Interest Application for the Chilkoot River and Lake was been approved by BLM on February 1, 2006 (see text box on selected lands in Section 2.3.1.2 in the Proposed RMP/Final EIS). BLM no longer claims an interest in the submerged lands.
43 - 18	There is ongoing fisheries research on the river and lake. Anthony Crupi has done research on bears and bear/human interaction on the Chilkoot since 2000, with five years of data accumulated so far. I believe we could easily support a research designation.	Thank you, comment acknowledged.
45 - 2	We are writing in support of establishing a special use area in the Haines area (ACEC to be managed as a Research Natural Area) to study and protect mountain goats.	Please see responses to comments 34-27 under DOI/BLM Compliance.
45 - 9	AQRC urges BLM to designate the BLM-managed public lands in the Haines area as an Area of Critical Environmental Concern and manage it as a Research Natural Area for the purpose of protecting wildlife, especially mountain goats, by prohibiting helicopter, snowmachine and other mechanized intrusions. This will also allow an opportunity to obtain definitive data which in the future would permit the scientific management of mountain goats. Whether or where BLM could permit helicopter activity in the future would be determined for the first time, by the results of research on this specific goat population. In supporting LCC's request, we recognized that it is in conflict with designating the Haines Block as an SRMA and, accordingly, withdraw our previous support for that area to be a SRMA.	Please see response to comment 26-3 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
50 - 2	And I would recommend that very little restrictions be replaced on that area at this time.	Thank you for your comment. Under Alternative D, BLM is proposing the Neacola Mountains ACEC, south of Lake Chakachamna. BLM will establish use restrictions during the implementation-level planning for the ACEC following approval of the Proposed RMP/Final EIS. We will manage all lands within the planning area through the application of ROPs and/or stipulations, and the NEPA process associated with proposals to use these lands.
50 - 4	It's pretty good fishing there, and I really would recommend that opportunity be there for a certain amount of development. It's a huge area, and a few lodges or cabins are not going to detract from the area. I would appreciate your consideration in that.	See response to comment 50-2 under Special Management Areas.
51 - 2	I urge the BLM to adopt the protective measures outlined in Alternative C, including the creation of new Special Recreation Management Areas, and especially the Neacola Mountains Area of Critical Environmental Concern, in order to protect our wild rivers, wilderness-quality landscapes, sensitive wildlife habitat, and other natural resources.	Although Alternative C is not BLM's Proposed Action, Alternative D would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC, designate BLM-managed lands in the Knik River and Haines Block as Special Recreation Management Areas, and would delineate travel management for off-highway vehicle use as "Limited".
51 - 4	The proposed Knik River and Haines Area Special Recreation Management Areas also afford an excellent opportunity to protect recreation opportunities, as well as mountain goat habitat. I think it's crucial that these management objectives emphasize enforcement of responsible regulations for commercial tourism and off-highway vehicle usage, and take strong steps to minimize adverse impacts to wildlife and wild lands associated with these activities.	<p>BLM recognizes the varied recreation opportunities that the Knik River Valley has to offer, and has assigned the "limited" OHV classification to the area. We intend to further define the management of the Knik River SRMA through the development of an implementation plan, which will incorporate the goals (Appendix F) for the SRMA. BLM is committed to working with all of the interested parties as part of its planning process.</p> <p>BLM will assess and manage areas and, if necessary, can use seasonal closures, off-sets, and trail designations to mitigate damage to sensitive areas. BLM may also, during the development of the implementation plan for the Knik River SRMA, determine that there are areas which should be managed to allow additional OHV use.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
52 - 3	The proposed Knik River and Haines Area Special Recreation Management Areas also afford an excellent opportunity to protect recreation opportunities, as well as mountain goat habitat. I think it's crucial that these management objectives emphasize enforcement of responsible regulations for commercial tourism and off-highway vehicle usage, and take strong steps to minimize adverse impacts to wildlife and wild lands.	Appendix F in the Proposed RMP/Final EIS lists the proposed goals and management objectives for these two areas. The preferred decision for all areas within this plan is to delineate travel management for off-highway vehicle use as "Limited". This delineation will limit use to existing roads and trails (National Mgt. Strategy for Motorized OHV Use on Public Lands, DOI, January 2001). Implementation of limited use area designations for OHVs would be effective immediately after signature of the decision record. However, specific enforcement policies will be established during implementation-level planning, which will occur only after completion of the Proposed RMP/Final EIS. See also response to comment 11-4 under Off-Highway Vehicles.
53 - 2	As someone who is very concerned with protecting our country's wild public lands, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	The Proposed Action (D) would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC, but the Chilligan River tract would not be included in the ACEC. The boundaries of the Neacola Mountains ACEC are based on our analysis of the scenic and other resource values of the area. Other areas were considered but not included in the proposed ACEC. BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable laws. BLM will consider the management of the adjoining lands and attempt to be as consistent in our management as allowed by our policies.
53 - 3	I encourage you to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 53-2 under Special Management Areas.
53 - 4	Additionally, Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Thank you, comment acknowledged. The Proposed Action (D) would designate the Neacola Mountains as an ACEC with a VRM Class II.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
54 - 3	We are concerned at the lack of designated Wild and Scenic Rivers and the lack of protection for the stairstep area above Lake George.	BLM will continue to manage all lands over which we have responsibility, including in the area around Lake George, in a manner consistent with FLPMA and other applicable laws.
54 - 4	<p>Regarding the Neacola Mountains ACEC:</p> <p>We encourage the designation of both blocks of Neacola Mountains area as ACEC, as depicted in the original RMP maps. The outstanding scenery, habitat and recreation values in the Chilligan and MacArthur River areas cannot be adequately protected without ACEC management.</p>	Please see response to comment 53-2 under Special Management Areas.
54 - 6	<p>Regarding the Haines Block SRMA:</p> <p>We support the designation of the Haines Block area as a SRMA. Furthermore, we support designating and managing the proposed Mountain Goat Monitoring and Control Area as a research natural area. SRMA designation alone will not provide adequate protections for mountain goats and other wildlife from the increasing recreational use of helicopters.</p>	Please see response to comment 26-3 under Special Management Areas.
55 - 2	In the Haines area, I would like to see the Goat Monitoring and Control Area removed from the Haines block (which is to be managed for recreation) and be designated an Area of Critical Environmental Concern (ACEC) and be used as a Research Natural Area. A lot of data has been collected in this heli-free area that will be useful to compare to heli-used areas once the 10+ years of data is tabulated and studied. We need this area to remain a study area so that comparison studies can continue.	Please see response to comment 26-3 under Special Management Areas. See also response to comment 40-5 under Wildlife.
55 - 5	Please remove this area from the Haines Block and designate it for use as a permanent Research Natural Area.	Please see response to comment 26-3 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
60 - 3	I urge the BLM to adopt the protective measures outlined in Alternative C, including the creation of new Special Recreation Management Areas, and especially the Neacola Mountains Area of Critical Environmental Concern, in order to protect our wild rivers, wilderness-quality landscapes, sensitive wildlife habitat, and other natural resources.	Please see response to comment 51-2 under Special Management Areas.
60 - 5	The proposed Knik River and Haines Area Special Recreation Management Areas also afford an excellent opportunity to protect recreation opportunities, as well as mountain goat habitat. I think it's crucial that these management objectives emphasize enforcement of responsible regulations for commercial tourism and off-highway vehicle usage, and take strong steps to minimize adverse impacts to wildlife and wild lands associated with these activities.	Please see response to comment 52-3 under Special Management Areas.
61 - 2	I STRONGLY URGE. . . the BLM to adopt the protective measures outlined in Alternative C, including the creation of new Special Recreation Management Areas, and especially the Neacola Mountains Area of Critical Environmental Concern, in order to protect our wild rivers, wilderness-quality landscapes, sensitive wildlife habitat, and other natural resources.	Please see response to comment 51-2 under Special Management Areas.
61 - 4	The proposed Knik River and Haines Area Special Recreation Management Areas also afford an excellent opportunity to protect recreation opportunities, as well as mountain goat habitat. I think it's crucial that these management objectives emphasize enforcement of responsible regulations for commercial tourism and off-highway vehicle usage, and take strong steps to minimize adverse impacts to wildlife and wild lands associated with these activities.	See response to comment 52-3 under Special Management Areas.
65 - 1	I am writing to urge the BLM to adopt and implement the protective measures outlined in Alternatives C and D, including the proposed Knik River and Haines Area Special Recreation Management Areas and the proposed 229,000-acre Neacola Mountains and Blockade Glacier Area of Critical Environmental Concern, conservation measures that are part of its final resource management plan for Alaska's Ring of Fire area.	Thank you, comment acknowledged. Alternative D is BLM's Proposed Action.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
68 - 3	A Research Natural Area (RNA) designation would promote biological diversity and opportunities for research and education. An ACEC/RNA that includes the current Monitoring and Control Area and BLM lands north of Glacier Bay would be ideal.	Please see response to comment 34-27 under DOI/BLM Compliance.
69 - 1	I am writing you in support of an ACEC for the Neacola Mountain blocks.	Please see response to comment 52-3 under Special Management Areas.
70 - 2	I am writing to ask that you manage it for senic values and for the wildlife.	Please see response to comment 7-9 under Special Management Areas.
70 - 3	<p>It is my understanding that the BLM administers two blocks of lands in the Alaska Range: several hundred thousand acres of land in the Neacola Mountains and nearly a hundred thousand acres around the Chiligan River.</p> <p>As this proposal includes the Blockade Glacier and Shamrock Glacier above Chakachamna Lake and the Chiligan parcels that makes it even more important to protect for senic values.</p>	Please see response to comment 53-2 under Special Mangement Areas.
70 - 5	<p>Concerning the BLM Land Use Plan for the Ring of Fire region (1.3 million acres of coastal lands in AK), and your proposal to manage the Chilliagan and Neacolas as special areas with a focus on scenic values, such as wilderness quality, remoteness, and outstanding visual resources, as well as wildlife; I totally support this. I also support the nomination as ACEC (Area of Critical Environmental Concern). I know this would necessarily limit airplane use, hunting/fishing camps & access or lodges, or recreation. We need to recognize the outstanding values and prioritize values when considering future management actions of this area.</p>	<p>The Chiligan River tract would not be included in the ACEC. BLM will manage the resources associated with the Chiligan River and all other lands within the Ring of Fire planning area through the application of the ROPs and stipulations, and the NEPA process associated with proposals to use these lands. Please also see response to comment 51-2 under Special Management Areas.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
71 - 3	The RMP characterizes Haines Borough BLM lands as having "a particularly diverse and unique set of flora and fauna". Diverse and unique resources should be protected from increasing heli-supported recreation, and they are best protected through an ACEC/RNA designation.	Please see response to comment 26-3 under Special Management Areas.
74 - 2	I am pleased to see that the BLM has continued to designate the area as a monitoring area. However, I am concerned to note that the overall management designation for the surrounding area is that of a Special Resource Management Area (SRMA).	Please see response to comment 34-27 under DOI/BLM Compliance.
74 - 4	I believe that the monitoring area is important not only because it has provided, and will continue to provide, important baseline data for measuring the impacts of commercial recreational activity, but also because it holds the possibility of developing into an economic asset to the borough like the Chilkat Eagle Preserve.	Thank you for your comment. See response to comment 26-2 under Socioeconomics. Studies conducted in this area likely have provided useful data that could have multiple scientific applications. Also see response to comment 26-3 under Special Management Areas.
74 - 5	The SRMA designation for the area seems inappropriate. A SRMA is managed "to meet the strategically-targeted primary recreation market demand." (DEIS at 3-174, 174) A more appropriate designation would appear to be that of a Resource Natural Area (RNA), as part of an Area of Critical Environmental Concern (ACEC). An RNA is a particular ACEC that provides for biological diversity and opportunities for research and education. (DEIS at 3-173).	Please see response to comment 26-3 under Special Management Areas.
75 - 2	Therefore we urge the BLM to adopt the protective measures outlined in Alternative C, including the creation of new Special Recreation Management Areas, and especially the Neacola Mountains Area of Critical Environmental Concern, in order to protect our wilderness, wildlife and natural resources. Protection of these incredible scenic resources and recreation opportunities for the enjoyment of future generations is absolutely necessary today.	Please see response to comment 51-2 under Special Management Areas.

Special Management Areas

Comment #	Comment	Response
75 - 3	The proposed Knik River and Haines Area Special Recreation Management Areas also afford an excellent opportunity to protect recreation opportunities, as well as mountain goat habitat. I think it's crucial that these management objectives emphasize enforcement of responsible regulations for commercial tourism and off-highway vehicle usage, and take strong steps to minimize adverse impacts to wildlife and wild lands associated with these activities.	The PRMP/FEIS lays the groundwork for determining what level of commercial recreation use might be appropriate for specific areas. It does this by identifying management objectives based on Recreation Opportunity Spectrum classes. The PRMP/FEIS also identifies, in Alternatives C and D, specific areas where commercial recreation use limits (including heli-skiing) would be established. Developing use limits for heli-skiing (or other commercial recreation activities) for a given area includes characterizing the area's user, knowing their tolerances for certain activities, and setting limits based on those tolerances; along with consideration of resource impacts, economic impacts, and safety concerns. See also response to comment 52-3 under Special Management Areas.
79 - 5	Special Management Areas- I am particularly interested in the proposed Haines/Skagway SRMA.	Thank you, comment acknowledged.
79 - 10	I am particularly concerned about the Chilkoot and Chilkat watersheds. There are increasing incursions into the interiors of these valleys, and such uses are having unforeseen impacts. Until future research and planning can provide a strong protection for the resources in these areas, I favor as much current protection in this area as possible to retain the greatest amount of potential for the future planning process.	Thank you for your comment. The Chilkat, Chilkoot, and Ferebee River valleys are within the Haines Block SRMA that is proposed under Alternatives C and D. BLM will determine use restrictions and resource protections during implementation level planning.
80 - 4	I believe that the alternative, D, proposed by the BLM is excessive and does not merit change. Jeff Denton and other state and BLM biologists have not done enough winter, (February-April) wildlife studies to merit substantial change.	See response to comment 16-2 in Special Management Areas.
80 - 5	I also believe portions of the monitoring control Area need to be opened to heliski operations. This mainly includes all alpine and glaciated terrain above tree line.	The subsequent implementation plan for the Haines Block SRMA will address landings, timing, and the effected resources, including mountain goats.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
80 - 6	I will say as an operator that the preferred alternative, D, lends itself to much regulation without substantial winter wildlife impact data to merit any change.	Thank you, comment acknowledged. BLM has compiled mountain goat data gathered during this project. BLM will consider the data in the development of the implementation plan for the Haines area. More studies or further analysis may be forthcoming.
81 - 2	I support designating BLM lands north of Glacier Bay as an Area of Critical Environmental Concern to protect goat populations and other wildlife.	Please see responses to comments 34-20 under Special Management Areas and 34-27 under DOI/BLM Compliance.
81 - 4	Protecting the lands north of Glacier Bay would provide an important natural baseline for research that has already been lost elsewhere.	Thank you, comment acknowledged.
82 - 2	I would like skiplane access to continue for all glaciated zones of the Haines Block SRMA.	Thank you, comment acknowledged. See response to comment 80-5 under Special Management Areas.
83 - 1	I am writing in comment regarding the Haines Block Special management area and the future of its use. My interest in the geography from the Haines highway to Skagway is not commercial, but related to the tremendous recreational opportunities, specifically climbing and skiing in this area. I feel that first and foremost ski planes should be allowed to access this area for landings. The areas suitable for landing a ski plane are almost exclusively above 3000ft. Because of this I think that it is relatively unobtrusive to wildlife especially in light that these areas are mainly glaciated area without resident animals. Having spent 16 days on the upper Chilkat glacier we saw no animals or tracks in the surrounding area. Ski planes offer a very limited type of access during winter and spring months.	Please see response to comment 80-5 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
83 - 2	In regard to helicopters I would suggest limited use during the winter and spring months, these are the months when the Haines economy is starving and adventure sports are helping to improve business all around.	The Proposed RMP/Final EIS lays the groundwork for determining what level of commercial recreation use might be appropriate. An activity implementation plan would be developed for the Haines Block SRMA. BLM would work with all interested parties to outline a range of alternatives for management and to identify specific decisions regarding economic development, including commercial helicopter access. See also response to comment 80-5 under Special Management Areas.
83 - 4	In regard to the lower regions of this area (i.e. the Chilkat, Ferebee, Kelsall and surrounding drainages) I think significant policy must be implemented to protect the salmon habitat. Jet boats, timber harvests, and mining operations should not be allowed if they may jeopardize the fish habitat. Too many people depend on the fish in these drainages to compromise it.	Not all of the lands in the areas noted are managed by BLM. BLM is a multiple use agency and will attempt to balance the needs of various affected stakeholders on their designated lands. The PRMP/FEIS classifies lands for various purposes, but does not authorize any activities. Future proposals will be subject to the NEPA process and the application of the ROPs and stipulations. Proposals also require the completion of an ANILCA Section 810 evaluation that considers the potential impacts of the proposal on the lands and on the subsistence resources.
84 - 4	I have grave concerns with your plan to locate the "Mountain Goat Monitoring and Control Area" inside of the Special Recreational Management Area. This strategy seems to defy logic and good biological sense. If these high value resources merit "monitoring" and the creation of a "control area", certainly these areas must be separated from the impacts of recreational use. Your integration of the two designations, clearly negates the value of the intent to monitor and control for impacts.	Please see response to comment 26-3 under Special Management Areas.
84 - 6	The Mountain Goat Monitoring and Control area should be managed as both a Research Natural Area and an Area of Critical Environmental Concern. This status will ensure that, in future generations, as the area's economy changes, with new and potentially harmful impacts to goats, the area's goat populations—among the most robust in the world—will have the benefit of a valid control-habitat that allow scientific assessment of impacts to the surrounding regions.	Please see response to comment 26-3 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
85 - 2	I support the creation of the Neacola Mountains ACEC on the grounds that BLM should provide special management for special areas it manages and I assume the area meets the criteria for an ACEC. I lack personal knowledge of the area and suggest that the final version of the RMP/EIS contain sufficient information describing the area to support such a designation.	Please see response to comment 7-9 under Special Management Areas.
85 - 3	I have been made aware of, and have read, the application and supporting material submitted by Lynn Canal Conservation (LCC) to designate the Haines Block as an ACEC, to be managed as a RNA, for the protection of the mountain goat population. I find their submission to be very persuasive and believe it offers BLM a unique opportunity to do the necessary studies so that true scientific management of this species of wildlife could be achieved.	Please see responses to comments 26-3 under Special Management Areas and 34-27 under DOI/BLM Compliance.
85 - 5	Designating the area as an SRMA will encourage increased helicopter recreation/tourism and will mean that helicopter recreational/tourism needs will be the key determinant of BLM management actions. Accordingly, that means that the mountain goat population will have to accommodate this kind of traffic and landings. However, designating the area as an ACEC and managing it as a RNA will mean that helicopter recreation/tourism will have to accommodate itself to the needs of the mountain goats.	Please see response to comment 26-3 under Special Management Areas.
85 - 6	I do support the designation of the Knik River 80,000 acres as a SRMA provided that it is managed in a balanced fashion for both motorized and nonmotorized recreation.	See response to comment 11-4 under Off-Highway Vehicles.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
86 - 2	As someone who is very concerned with protecting our country's wild public lands, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	The Proposed Action (D) would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres an ACEC, but the Chilligan River tract would not be included in the ACEC. The boundaries of the Neacola Mountains ACEC are based on our analysis of the scenic and other resource values of the area. Other areas were considered but not included in the ACEC. BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable laws. BLM will consider the management of the adjoining lands and attempt to be as consistent in our management as allowed by our policies.
86 - 3	I encourage you to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 2 under Form Letter #2. Also, please reference the ACEC decision matrix in Section 2.2.
87 - 2	Our preference is for Alternative "C" for the following reasons: 1) We have been severaly impacted by the "recreation-gone-wild" activities, including dust, nuisance noise from gun fire, airboats, dirt bikes, ATVs; danger from explosions, shooting in the woods, drive-by shootings, car burnings and fireworks. The trails and camping areas are littered with left-over nails from pallet and construction debris fires, glass from shot-up bottles and spent cartridges.	Please see responses to comments 9-2 and 11-4 under Off-Highway Vehicles.
88 - 2	I support the creation of the Haines Block Special Recreation Management Area. As well, it is imperative that the Goat Monitoring and Control Area (GMCA) in the Haines Block is kept though should be managed independently of the SRMA . Please consider creating an Area of Critical Environmental Concern (ACEC) or a Research Natural Area (RNA) designation for this area and the lands within the Chilkoot Lake and Ferebee River watersheds. Please consider the current GMCA lands and the BLM lands north of Glacier Bay National Park for inclusion in this ACEC/RNA area.	Please see response to comment 26-3 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
88 - 3	The people of the Haines Borough voted in 1996 to not allow summer helicopter tours, please respect this vote of the people by not permitting summer helicopter operations on BLM lands in the Haines Borough.	Please see response to comments 34-15 and 43-3 under Recreation.
89 - 2	I support the creation of the Haines Block Special Recreation Management Area. As well, the current Goat Monitoring and Control Area (GMCA) needs to be retained, but not inside the SRMA.	Please see response to comment 26-3 under Special Management Areas.
89 - 3	I suggest creating an Area of Critical Environmental Concern (ACEC) or a Research Natural Area (RNA) designation to promote biological diversity and opportunities for research and education which are so valuable to the tourism economy of Haines.	Thank you, comment acknowledged. BLM agrees that the area has remarkable natural attributes and opportunities for research and education. BLM has proposed the area would be managed as an SRMA; BLM would work with interested parties to develop integrated activity plans to manage the important resources in the area. See also response to comment 26-3 under Special Management Areas.
89 - 4	Please designate the current GMCA lands and the BLM lands north of Glacier Bay National Park for inclusion in this ACEC/RNA area.	Please see responses to comments 26-1 and 26-3 under Special Management Areas.
89 - 5	Please refrain from allowing summer helicopter tours and helicopter based-recreation on BLM lands in the Haines Borough.	Please see response to comments 34-15 and 43-3 under Recreation.
90 - 2	I support the creation of the Haines Block Special Recreation Management Area. As well, it is imperative that the Goat Monitoring and Control Area (GMCA) in the Haines Block is kept, though should be managed independently of the SRMA . Please consider creating an Area of Critical Environmental Concern (ACEC) or a Research Natural Area (RNA) designation for this area and the lands within the Chilkoot Lake and Ferebee River watersheds. Please consider the current GMCA lands and the BLM lands north of Glacier Bay National Park for inclusion in this ACEC/RNA area.	Please see response to comment 26-3 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
90 - 3	Please do not allow summer helicopter recreation.	Please see response to comments 34-15 and 43-3 under Recreation.
91 - 1	<p>I wish to support BLM's proposed Alternative D, to designate an Area of Critical Environmental Concern (ACEC), for the management of the BLM lands in the Neacola Mountains and Chilligan River area, near Chakachamna Lake, Alaska.</p> <p>I believe that despite these mountains' relative proximity to Anchorage, very few people have visited them. They fully deserve the management flexibility and protection that BLM's proposed Alternative D would offer this area, to recognize their unique wilderness and natural values.</p>	Please see response to comment 53-2 under Special Management Areas.
91 - 3	<p>Based on my fairly extensive on-the-ground experiences in the adjacent Tordrillo Range, I believe that all BLM lands in the Chakachamna Lake area should be managed as an Area of Critical Environmental concern, which will recognize their very high wilderness recreational values and their relatively untouched natural condition. This management proposal (BLM's Alternative D) should allow the relatively low levels of existing human activity in this area to continue, but should require more extensive analysis and planning by BLM, if new activities that would significantly alter the present solitude and de facto wilderness condition of this outstanding natural area are proposed in the future.</p> <p>I strongly believe that the unparalleled solitude and wilderness resources of this area should be recognized, managed and preserved for future generations of outdoor recreationists to enjoy. BLM's Alternative D will accomplish this better than any other management proposal being considered at the present time.</p>	Please see response to comment 53-2 under Special Management Areas.

Special Management Areas

Comment #	Comment	Response
92 - 1	<p>I am writing to comment on the proposed management of the "Goat Monitoring and Control Area" in the Haines vicinity. I am pleased to see that the BLM has continued to designate the area as a monitoring area. BUT, I am very concerned to note that the overall management designation for the surrounding area is that of a Special Resource Management Area (SRMA).</p> <p>The Goat Monitoring Area has been managed as such for over 10 years. There is a considerable amount of commercial tour helicopter activity on the Skagway side of the area (summer glacier tours some of which we know, is within the Haines Borough boundaries). We have yet to try to enforce that. The Haines Borough has recently passed ordinances to regulate commercial helicopter tour activity in the borough, and has respected and incorporated the monitoring area. We have spent to past 6 years trying to work out a regulatory procedure that is acceptable to the majority. I think that has finally occurred. Let's not go backwards and toss all that hard work to the wind, for the words of a few.</p>	Please see response to comment 26-3 under Special Management Areas.
92 - 2	<p>The continuation of monitoring the area is important not only because it has provided, and will continue to provide, important baseline data for measuring the impacts of commercial recreational activity, but also because it holds the possibility of developing into an economic asset to the Haines borough.</p>	Please see response to comment 26-2 under Socioeconomics.
92 - 4	<p>The SRMA designation is inappropriate, and I totally disagree with it. A SRMA is managed "to meet the strategically-targeted primary recreation market demand." Anyone can hire a helicopter, and claim they have a lucrative business. That is not a basis to change an already known and thoroughly studied wildlife area, and hunting resource, and turn it into a recreational area for the rich and elite. A more appropriate designation would appear to be that of a Resource Natural Area (RNA), as part of an Area of Critical Environmental Concern (ACEC). An RNA is a particular ACEC that provides for biological diversity and opportunities for research and education. (DEIS at 3-173).</p>	Please see response to comment 26-3 under Special Management Areas.
93 - 1	<p>As a 30 year Alaskan and outdoor enthusiast I support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.</p>	Please see response to comment 53-2 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
93 - 2	I encourage BLM to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 53-2 under Special Management Areas.
94 - 2	I support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	Please see response to comment 53-2 under Special Management Areas.
94 - 3	I encourage BLM to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 70-5 under Special Management Areas.
98 - 1	In the 2004 BLM Ring of Fire scoping process, our organizations supported creating an Area of Critical Environmental Concern, Research Natural Area (ACEC/RNA) to protect mountain goats in the Haines Block from impacts of helicopter-supported recreation. We continue to believe an ACEC/RNA designation would best protect the significant mountain goat resources in this area identified in the Ring of Fire draft environmental impact statement (DEIS).	Please see response to comment 26-3 under Special Management Areas.
98 - 2	We fully support retaining the Mountain Goat Monitoring and Control Area created in 2002. Protecting and preserving goats is best achieved through an ACEC/RNA designation and cannot be achieved if the existing Monitoring and Control Area is placed inside a Special Recreation Management Area (SRMA), as would occur under BLM's preferred alternative. A SRMA is managed to meet the market demand for recreation, which the DEIS identifies as helicopter-supported. This conflicts with the management intent of a Goat Monitoring and Control Area - to act as a control against which impacts of helicopter-supported recreation can be measured.	Please see response to comment 26-3 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
98 - 3	Analyzing ten years of goat monitoring data that BLM has for the Haines Block is a necessary preliminary step to understanding impacts. Placing the existing Monitoring and Control Area inside an ACEC/RNA will allow much needed, in-depth research to occur and give land managers the tools they need to manage helicopter-supported activity in goat habitat throughout Alaska.	See response to comment 26-3 under Special Management Areas. See also response to comment 34-11 under DOI/BLM Compliance.
99 - 2	As someone who is very concerned with protecting our country's wild public lands, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	Please see response to comment 53-2 under Special Management Areas.
99 - 3	I encourage you to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 53-2 under Special Management Areas.
100 - 2	As someone who is very concerned with protecting our country's wild public lands, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	Please see response to comment 53-2 under Special Management Areas.
100 - 3	I encourage you to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 53-2 under Special Management Areas.
101 - 2	As someone who is very concerned with protecting our country's wild public lands, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	Please see response to comment 53-2 under Special Management Areas.

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<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
101 - 3	Today I encourage you to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 53-2 under Special Management Areas.
102 - 1	As someone who is very concerned with protecting our country's wild public lands, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP. The newer map, with 143,000 less acres is unacceptable.	Please see response to comment 53-2 under Special Management Areas.
103 - 1	As someone who is very concerned with protecting our country's wild public lands and a 43 resident of Alaska, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	Please see response to comment 53-2 under Special Management Areas.
104 - 2	As someone who is very concerned with protecting our country's wild public lands, I urge you to support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	Please see response to comment 53-2 under Special Management Areas.
104 - 3	I STRONGLY URGE YOU... to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 53-2 under Special Management Areas.
106 - 2	I support the proposed Neacola Mountains ACEC as depicted in the original maps included in the draft Ring of Fire RMP. Reducing the amount of included land as currently proposed is unacceptable.	Please see response to comment 53-2 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
106 - 3	I encourage the BLM to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 53-2 under Special Management Areas.
107 - 2	I support the proposed Neacola Mountains ACEC, as depicted in the original maps included in the draft Ring of Fire RMP.	Please see response to comment 53-2 under Special Management Areas.
107 - 3	I encourage BLM to include the Chilligan River and McArthur River tracts in the proposed ACEC. I believe that the outstanding scenery and resource values of these lands, as well as the Blockade Glacier and Lake, warrant the enhanced protections from visually disruptive activities that ACEC management would provide.	Please see response to comment 53-2 under Special Management Areas.
108 - 2	I support designating the Neacola Mountains ACEC for the preservation of scenic values on the Blockade Glacier tract. However, I am disappointed by the elimination of 143,000 acres. The original map proposal for 372,000 acres received unanimous public support during the comment period and hearings, according to BLM.	Please see response to comment 53-2 under Special Management Areas.
108 - 3	Because of the outstanding public resources present within the Chilligan River block, I believe it deserves special ACEC management attention as well. Wildlife is abundant in this area which provides important migration corridors and habitat for dall sheep, brown and black bears, moose, and bald eagles, as well as spawning habitat for salmon. There are also many recreation opportunities, typically accessed by small aircraft, feature sport hunting, kayaking, and hiking. Adventurous ice climbers and skiers have immersed themselves in these wild lands and rivers for decades, all within direct sight of Anchorage.	Please see response to comment 53-2 under Special Management Areas.

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<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
108 - 4	I would like to go on record as supporting perservation of all 372,000 acres.	Please see response to comment 53-2 under Special Management Areas.
109 - 2	I support the proposed Neacola Mountains ACEC zoned in the Ring of Fire RMP. Other areas I would like to see included are the Chilligan River and MacArthur River tracts in the proposed ACEC. The Blockade Lake and glacier area also deserves protection that could be offered by the ACEC.	Please see response to comment 53-2 under Special Management Areas.
110 - 2	In general we support the designation of the north and south block of the Neacola Mountains ACEC, the Haines Block SRMA, and the Knik River SRMA.	The Proposed Action (D) would designate the Neacola Mountains - Blockade Glacier tract of 229,000 acres as an ACEC, designate BLM lands in the Knik River and Haines Block as Special Recreation Management Areas. The Chilligan River tract would not be included in the ACEC (see Section 2.2).
110 - 4	Regarding the Neacola Mountains ACEC: We encourage the designation of both blocks of Neacola Mountains area as ACEC, as depicted in the original RMP maps. The outstanding scenery, habitat and recreation values in the Chilligan and MacArthur River areas cannot be adequately protected without ACEC management.	Please see response to comment 53-2 under Special Management Areas.
110 - 6	Regarding the Haines Block SRMA: We support the designation of the Haines Block area as a SRMA. Furthermore, we support designating and managing the proposed Mountain Goat Monitoring and Control Area as a research natural area. SRMA designation alone will not provide adequate protections for mountain goats and other wildlife from the increasing recreational use of helicopters.	Please see response to comment 26-3 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
110 - 7	<p>Regarding the Knik River SRMA:</p> <p>This area is well known and used for non-motorized recreation by our local members. The lack of trail inventory and assessment on BLM lands requires a more conservative approach than the "generally allowed uses on state land" on "existing roads and trails" that is proposed. The current level and quality of ORV use in this area is not sustainable and is causing substantial degradation of fish, wildlife and recreational resources.</p>	Please see responses to comments 11-4, 12- 4, and 54-8 under Off-Highway Vehicles.
111 - 2	<p>There should be a goat monitoring and control area , ACEC/RNA, that is not inside a SRMA that has no mandate for wildlife protection. PLEASE DESIGNATE THE EXISTING MOUNTAIN GOAT MONITORING AND CONTROL AREA AS AN ACEC. Designating BLM lands on the north of Glacier Bay National Park as ACEC/RNA would also protect this highly sensitive area from summer heli supported activity.</p>	Please see response to comment 26-3 under Special Management Areas.
111 - 3	<p>Honor the heli-ski map adopted by the Haines Borough Assembly by REMOVING TAKIN RIDGE LANDINGS FROM BLM PERMITS.</p>	Please see response to comment 80-5 under Special Management Areas.
111 - 5	<p>PLEASE ADOPT NWSGC RECCOMENDATIONS WHEN ISSUING PERMITS THAT ACCESS BLM LANDS BY HELICOPTER.</p>	Please see response to comments 34-15 and 43-3 under Recreation.
112 - 5	<p>We support the Knik River SRMA concept as long as its purpose is to manage these lands in the spirit of the pending State Knik River Public Use Area legislation. The AOAA believes that South Central Alaska needs a place designated for motorized recreation. The proposed Knik River Public Use Area maintains the Knik River as a suitable destination for motorized recreation. We would like the draft RMP regarding the Knik River SRMA reflect that purpose as well.</p>	Please see response to comment 29-4 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
113 - 12	<p>Protect the Chilligan and McArthur Rivers as part of Neacola ACEC</p> <p>American Rivers strongly urges the BLM to adopt the boundaries for the proposed Neacola ACEC as laid out in the original map published in the RMP and not the smaller, revised version. There has never been adequate clarification as to why the ACEC was scaled back, and the larger Neacola ACEC would protect some truly outstanding river segments. We strongly urge BLM to include the 143,000 acre northern tract, which contains the Chilligan River, in the Neacola Mountains ACEC.</p>	Please see response to comment 53-2 under Special Management Areas.
113 - 13	<p>As you know, the Chilligan River watershed is jointly managed by the BLM and the National Park Service (NPS). The 18 river miles managed by NPS were declared eligible for designation as a National Wild and Scenic River in a 1993 study, with a tentative classification as "Wild" for the protection of scenic values. The Draft Ring of Fire RMP/EIS also finds the BLM-managed segments of the Chilligan River to possess outstandingly remarkable scenic and wildlife values, and thereby also eligible for Wild and Scenic River status. These values should be protected regardless of the ultimate suitability determination for the Chilligan due to its continuity with the NPS' portion of the river. Assignment of an appropriate alternative administrative designation, such as inclusion within the Neacola Mountains ACEC or Outstanding Natural Area (ONA), would help to ensure protective management of the Chilligan River's identified ORVs.</p>	<p>Thank you, comment acknowledged. The Chilligan Block was considered but not included in the proposed ACEC (see Section 2.2 for further explanation). The boundaries of the Neacola ACEC are based on our analysis of the scenic and other resource values of the area. BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable law. BLM will consider the management of the adjoining lands and attempt to be as consistent in our management as allowed by our policies.</p>
113 - 14	<p>Along with the Alaska Coalition, American Rivers also believes that the northern Chilligan River tract should be included in the Neacola Mountains ACEC due to its outstanding wildlife habitat, as well as its available opportunities for commercial and private recreation. This 143,000 acre tract serves as a critical wildlife travel corridors, as well as year-round habitat.</p>	Please see response to comment 53-2 under Special Management Areas.
113 - 15	<p>According to the original Figure 2.3-3 map, it appears that this tract was considered for inclusion in the ACEC in the initial stages of this Draft RMP/EIS, however BLM provided no explanation for its eventual exclusion. We request that this omission be corrected.</p>	Please see response to comment 53-2 under Special Management Areas.

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<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
113 - 16	Finally, we also request that BLM include, and provide interim protection for, the 64,000 acres of state-selected lands along the McArthur River as part of the Neacola Mountains ACEC. Due to the uncertainty of future land conveyances, we support providing interim protection for the McArthur River lands consistent with the management objectives of the proposed Neacola Mountains ACEC. According to the September 2005 State of Alaska selection priority map, it appears that this parcel is not prioritized for conveyance. If state selections on the McArthur River lands are ultimately relinquished, we support permanently including these lands within the boundaries of the Neacola Mountains ACEC.	Please see response to comment 53-2 under Special Management Areas.
114 - 2	I would like to say that of the proposed alternatives I would prefer C, the Resource Conservation model. However, even in this alternative the BLM administered land in the Haines area would be designated an SRMA and there seems to be at this point no indication that critical goat habitat would be protected. The potential is there for completely unrestricted heliskiing and summer helicopter tours, which would scuttle ADF&G's work in the study area along the Ferrebee Ridge. It would also run contrary to advisory votes in the Haines that showed the community would prefer that helicopter activity be closely controlled.	Please see response to comment 26-3 under Special Management Areas.
115 - 2	I absolutely support your EIS findings that propose to manage the Chilligan and Neacolas as special areas with a focus on scenic values, such as wilderness quality, remoteness, and outstanding visual resources, as well as wildlife for the Chilligan. I believe that this amazing area deserves its status as ACEC and justly limits airplane use, hunting/fishing camps & access or lodges, or recreation.	Please see response to comment 53-2 under Special Management Areas.
118 - 2	I urge the BLM to adopt the protective measures outlined in Alternative C, including the creation of new Special Recreation Management Areas, and especially the Neacola Mountains Area of Critical Environmental Concern, in order to protect our wild rivers, wilderness-quality landscapes, sensitive wildlife habitat, and other natural resources.	Please see response to comment 51-2 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
118 - 4	The proposed Knik River and Haines Area Special Recreation Management Areas also afford an excellent opportunity to protect recreation opportunities, as well as mountain goat habitat. I think it's crucial that these management objectives emphasize enforcement of responsible regulations for commercial tourism and off -highway vehicle usage and take strong steps to minimize adverse impacts to wildlife and wild lands associated with these activities.	See response to comment 52-3 under Special Management Areas.
119 - 10	The national demand for outdoor recreation and open spaces in Alaska is constantly rising due to the growing resident population and increasing number of tourism visitors to the state. A July 26, 2005, article in The New York Times titled "Race to Alaska Before it Melts," states that many people plan to visit Alaska in the immediate future, "before it disappears" due to the consequences of global warming on our climate, wildlife habitat, and traditional way of life. We hope that BLM also will acknowledge the values of a sustainable approach to using public lands by adopting protective benefit-based management objectives in the Final RMP/EIS that fairly support the needs of all of the users of the southern Alaska BLM lands.	Thank you, comment acknowledged.
119 - 13	We urge BLM to adopt strong protective management directives for each of the special areas proposed in the Draft RMP/EIS in a responsible effort to strike a balance between conservation and development of the Ring of Fire area's public resources.	Thank you, comment acknowledged. BLM is required by FLPMA to manage public lands for multiple uses, and the PRMP/FEIS provides the guidance to uphold this mandate. Through implementation level planning, BLM will manage to maintain a range of recreation opportunities, conservation efforts, and resource development. BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable law.
119 - 14	We strongly support the proposed Neacola Mountains ACEC, particularly the alternative depicted in Figure 2.3-3 of the Draft RMP/EIS. We believe that the area's outstanding scenic, recreation, and wildlife values, in addition to the unselected status of these large tracts of lands warrant BLM's commitment of long-term, special attention to the management of these public resources. We commend BLM for responding with special consideration to our August 2004 scoping nomination for the Neacola Mountains ACEC (see attached ACEC Scoping Nominations). We also appreciate the work of Gary Reimer and the BLM staff in professionally championing this conservation-minded effort, which the general public has strongly supported.	Please see response to comment 53-2 under Special Management Areas.

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 16	<p>We strongly urge BLM to include the 143,000 acre northern tract, which contains the Chilligan River, in the Neacola Mountains ACEC. We nominated this parcel in our scoping comments and nomination packet for study and designation as an ACEC. We also nominated the 229,000 acres of the southern tract, which contains the Blockade Glacier. Our research, then and now, indicates that both tracts of land qualify for and are deserving of ACEC status.</p>	<p>Please see response to comment 53-2 under Special Management Areas. BLM will consider the management of the adjoining lands and attempt to be as consistent in our management as allowed by our policies.</p>
119 - 19	<p>We also believe that the northern Chilligan River tract should be included in the Neacola Mountains ACEC due to the above mentioned wildlife habitat, as well as its available opportunities for commercial and private recreation. This 143,000 acre tract serves as a critical wildlife travel corridor, as well as year-round habitat. It is more frequently visited by the public for hunting and recreation activities, both commercial and non-commercial, than the Blockade Glacier tract. The Chilligan River tract was nominated for ACEC designation in our scoping comments and, according to the original Figure 2.3-3 map, it appears that this tract was considered for inclusion in the ACEC in the initial stages of this Draft RMP/EIS. Moreover, BLM provided no explanation for its exclusion from the Draft RMP/EIS. We request that BLM correct this omission.</p> <p>We understand from discussions with Mr. Reimer that an individual who testified at the public hearing in Palmer on December 8, 2005, requested the establishment of public-use cabins within the "Neacola Mountains ACEC." This is just one example of an individual expressing support for the original Neacola Mountains ACEC designation proposal and special management provisions that include the Chilligan River tract (we assume that the individual was not requesting construction of public use cabins upon the Blockade Glacier). Because of the misleading depictions of the original maps of the proposed ACEC, as noted above, we believe that it would be appropriate for BLM to consider all such comments submitted by the original comment deadline as evidence of the public's support for including all 372,000 acres (both the Blockade Glacier and Chilligan River tracts) in the Neacola Mountains ACEC.</p>	<p>Please see response to comment 53-2 under Special Management Areas.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 20	<p>We also request that BLM include, and provide interim protection for, the 64,000 acres of state-selected lands along the McArthur River, adjacent to the Blockade Glacier tract, as part of the Neacola Mountains ACEC. Due to the uncertainty of future land conveyances, we support providing interim protection for the McArthur River lands consistent with the management objectives of the proposed Neacola Mountains ACEC. According to the September 2005 State of Alaska selection priority map, it appears that this parcel is not prioritized for conveyance. If state selections on the McArthur River lands are ultimately relinquished, we support permanently including these lands within the boundaries of the Neacola Mountains ACEC.</p> <p>As described in supplemental documents provided Mr. Lloyd, the McArthur River possesses ORVs and is eligible for Wild and Scenic designation:</p> <p>"Outstanding and Remarkable Values have been identified for wildlife and ecological function. These include high value moose winter areas and post rutting habitat. The south facing slopes that overshadow the river are high value feeding and denning areas for bears. This is also a known trumpeter swan and shore bird nesting area. These habitat areas are ecologically unique and important to these wildlife values. This river does receive some commercial (hunting via airboat) and non-commercial use (float boaters) during the summer and fall months."</p> <p>Source: December 20, 2005, BLM email from Robert Lloyd to Melissa Blair.</p> <p>We were surprised to see that none of the alternatives in the Draft RMP/EIS included a proposal that the Chilligan Block or the McArthur River lands be included in the Neacola Mountains ACEC. We hope that BLM will reconsider this decision.</p>	<p>Please see response to comment 16-13 under Lands and Realty. The boundaries of the Neacola Mountains ACEC are based on our analysis of the scenic and other resource values of the area. Other areas were considered but not included in the proposed ACEC. BLM will continue to manage all lands over which we have responsibility in a manner consistent with the requirements of FLPMA and other applicable law. BLM will manage the resources associated with the Chilligan River and all other lands within the planning area through the application of the ROPs and stipulations, and the NEPA process associated with BLM processing of proposals to use the lands.</p>
119 - 21	<p>BLM should consider the proposed Neacola Mountains ACEC for potential designation as an ONA or as a National Scenic Area (NSA). These designations may be even more appropriately tailored for allocating special management attention to the area's scenic, recreation and wildlife resources, than the ACEC designation.</p>	<p>See response to comment 27-7 in Coordination and Compatibility.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 36	<p>The State of Alaska is currently considering building a road to the proposed Pebble Gold-Copper Project (see attached map). The planning documents for this proposed mine identify Iniskin Bay as the desired location for a new deep water port (Port Site 1). If this road and deep water port are developed, the new access, activity, and human presence within this pristine river valley will likely have devastating impacts on the wild nature of the area and on previously undisturbed brown bear habitat. As the mining companies (and State of Alaska) proceed with plans to develop and provide infrastructure for the proposed Pebble Gold-Copper Mine Project, threats to the incredible wildlife resources of Iniskin River are becoming tangible and in critical need of management.</p> <p>We request an ACEC designation for the BLM-managed portion of the Iniskin River to recognize the significance of the wildlife, scenery, and recreation values along the river, in addition to providing necessary protections from the critical threats posed by the potential Pebble Gold-Copper mining district's road and port development.</p>	<p>The Iniskin River was considered for ACEC designation, but eliminated from further analysis for reasons discussed in Section 2.2. BLM will retain a very small part, if any, of the Iniskin River; future actions are subject to the application of the ROPs and stipulations as appropriate and will have to go through the NEPA process, which may develop mitigation measures related to the potential impacts of the activity being considered.</p> <p>The Pebble Mine Project is subject to NEPA requirements; therefore, all potential direct, indirect, and cumulative impacts to Iniskin Bay and the surrounding area will be analyzed for each proposed development during the planning phase of each development.</p>
119 - 38	<p>In its preferred alternative, BLM also refrained from making formal designations for OHV use within the proposed Knik River SRMA, the proposed Haines Block SRMA, and the proposed Neacola Mountains ACEC. As justification for the lack of designations in these areas, BLM stated that OHV use will be defined through the eventual development of state activity plans. Until the Special Management Areas (SMA) are finalized and a plan is developed, however, BLM must manage OHVs in these areas in a manner consistent with FLPMA, Executive Orders 11644 and 11989, and 43 C.F.R. Part 8340, and BLM must develop an interim management plan to ensure that OHV use will not adversely impact wildlife, vegetation, soil, and other natural and culture resources in these areas. A date and timetable for the process and completion of Travel Management Planning and implementation level plans should be clearly stated in the Final RMP/EIS.</p>	<p>The Proposed Action (D) for all BLM-managed lands within the planning area is to delineate travel management for off-highway vehicle use as "limited." This delineation will limit use to existing roads and trails (National Mgt. Strategy for Motorized OHV Use on Public Lands, DOI, January 2001). Implementation of limited use area designations for OHVs would be effective immediately after signature of the decision record.</p> <p>Additional or site-specific Travel Management Planning will be addressed within implementation plans for SMAs, which are produced after the PRMP/FEIS is approved. Through the development of implementation plans, produced with public involvement, resources may receive further levels of necessary protection from OHV use.</p> <p>It is not practical to define within the Ring of Fire Proposed RMP/Final EIS a specific date or timetable of when future activity-level plans would be processed. Per BLM policy, this work normally should be completed within five years of the signing of the ROD (BLM Land Use Planning Handbook - 1601, Comprehensive Trails & Travel Management, 3/11/06).</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 46	<p>The Knik River watershed originates high in the Chugach Range and slowly flows toward Knik Arm. This area supports streams filled with salmon, migrating birds, large mammals, glaciers, rivers, lakes and spectacular mountain scenery. It is an area that has an amazing variety of biodiversity, and a numerous recreational opportunities. It is a place that in the past has been nominated for National Park status, and probably in any other state it would be a prize park. This is an area that faces several challenges, highlighted by unruly behavior and irresponsible OHV use. Strong management and good planning are sorely needed in the Knik area.</p> <p>We are happy to see BLM propose in its Preferred Alternative (Alternative D) the Knik River SRMA. BLM lands at the headwaters of the Knik River watershed could be a world-class recreational destination, but BLM must properly manage these lands and contain OHV use to appropriate areas. This area is currently under heavy pressure from unregulated OHV use. We would welcome BLM's management of OHV use, accompanied by planning, and we look forward to being part of this planning process. We urge that this process begin as soon as possible.</p>	Please see response to comment 11-4 under Off-Highway Vehicles.
119 - 51	<p>In compliance with its multiple-use mandate, we request that BLM immediately and actively manage and protect the diverse spectrum of high quality recreation opportunities, including kayaking, canoeing, hiking, and wildlife-viewing, that currently exist on BLM-managed lands in the Knik River drainage, regardless of land status. User group conflict is a major problem along the Knik. We request that BLM also work with Knik River Watershed Group to develop a community-based management plan for the Knik River SRMA.</p>	<p>Thank you, comment acknowledged. BLM is committed to work with all interested parties in developing the implementation plan for this area. BLM is required by FLPMA to manage public lands for multiple uses, and the PRMP/FEIS provides the guidance to uphold this mandate. Through implementation level plans, BLM will manage to maintain a range of recreation opportunities, including those you've listed. It is also BLM's intent to work with all of the interested parties in an effort to minimize user conflicts.</p> <p>We intend to further define the management of the Knik area through the development of an implementation plan, which incorporates the goals (stated in Appendix F of the Proposed RMP/Final EIS) for the Knik River SRMA. BLM is committed to working with all of the interested parties as part of its planning process.</p>

Special Management Areas

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 54	<p>An ACEC is created to enhance resource values and an RNA is created to provide biological diversity and opportunities for research and education. Id. at 3-173. More specifically, an ACEC is an area "where special management attention is required to protect and prevent irreparable damage to important . . . wildlife resources." Id.</p> <p>On the other hand, an SRMA is created to be managed for recreational values and includes no mandate for protecting wildlife resources. Id. Specifically, an SRMA provides different recreational niches "to meet the strategically-targeted primary recreation market demand." Id. at 3-174. While an SRMA is the appropriate management tool for recreational use of the area, it is not an appropriate management tool for conserving and protecting wildlife values. Considering BLM's anticipation of increased demand for helicopter-supported recreation, BLM would be hard pressed to manage an SRMA that includes a Monitoring and Control Area because there is an inherent conflict between the demand for new landing areas and protecting an area from that same recreational activity. It would be more appropriate for BLM to institute the management scheme that would provide for the protection of wildlife and wildlife habitat. This would be an ACEC/RNA. Thus, we believe that the Haines Block should include two special management areas: an SRMA to protect existing recreational uses in the northern half of the proposed SRMA, and an ACEC/RNA for the designated Monitoring & Control Area and remaining Haines Block lands.</p>	Please see response to comment 26-3 under Special Management Areas.

End of section on Special Management Areas

Socioeconomics

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
5 - 2	10, 20, 30 years ago when there was just a few people living in the valley anybody could basically go out and do just about anything they wanted, and it had very little impact on the land. Today there's a lot of people, there's a lot of people that come in from the outside. There's a lot of impact on the land. This is my concern.	Thank you, comment acknowledged.
20 - 3	Over the years, the communities of Haines and Skagway have experienced difficult economic periods including the present time. Resource development would greatly assist in diversifying their economies. Therefore, Sealaska urges that the greatest flexibility be implemented to explore and develop minerals while providing statutory protection for air and water resources.	BLM is a multiple-use agency and as such is tasked with considering a variety of proposals on public lands. Potential mineral activities would be analyzed in future implementation plans, and in accordance with NEPA. In addition, mineral development would require a Plan of Operations, containing site specific ROPs and stipulations. Federal and state laws would also apply to mineral development in this area.
26 - 2	I believe that the monitoring area is important not only because it has provided, and will continue to provide, important baseline data for measuring the impacts of commercial recreational activity, but also because it holds the possibility of developing into an economic asset to the borough like the Chilkat Eagle Preserve.	Thank you, comment acknowledged. The Haines area has developed a diversity of important resource-based tourism opportunities. The BLM acknowledges the potential for future resource-based economic development opportunities in the area. Implementation plans would analyze alternatives for specific proposals in the Haines Block SRMA in the future.
43 - 14	When we first came here in 1985 there was only a gravel road and no tourism. Now the road is paved and tourism growth has pretty much exploded. In 2002 tourism to the Chilkoot, mostly to view brown bears and mountain goats, was estimated to bring in about two and a half million dollars into Haines and it's continued to rise.	Thank you, comment acknowledged.

End of section on Socioeconomics

Subsistence

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 45	In addition, we recommend that each of the proposed SRMAs are specifically managed to mitigate any impacts from recreational use upon subsistence resources.	SRMAs are areas with high actual and potential levels of recreational use, on which special measures are taken to monitor and reduce impacts to stream banks, vegetation, and fish and wildlife resources. The Haines Block SRMA in the Southeast planning region and the Knik River SRMA in Southcentral are both located on State-selected lands, on which the ANILCA Title VIII Federal subsistence priority does not apply. As a result, protection of habitat and fish and wildlife resources benefits local hunting and fishing, but there is no legal mandate to provide a Federal subsistence priority on these two specific areas.
119 - 71	In the Draft RMP/EIS, BLM failed to provide adequate foundation for its threshold, or tier-I, subsistence analyses for any of the four alternatives. It failed to provide sufficient detail about the anticipated activities that would occur under each of the four alternatives, and how those activities would impact subsistence resources and access in the planning area as a whole, much less in any particular area. BLM thus failed to adequately support its conclusion that none of the alternatives would impose a significant restriction on subsistence uses and resources. This analysis does not comply with BLM's mandates under the Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA).	More detailed information on development activities is found in the subject matter sections in the Proposed RMP/Final EIS, and this was the basis for the conclusions drawn in the Section 810 analysis. As an example, Appendix G provides a detailed account of oil and gas resource and development potential, supporting the estimate of 2600 acres affected. Additional discussion of development activities in each of the planning areas was taken from the subject matter sections in Chapter 4 and included in the Section 810 analysis included in the PRMP/FEIS. A regional level of analysis examining four planning regions within the larger planning area is appropriate for the purposes of the plan. In particular, since estimates of potential developments generally lack site-specific parameters at this stage of planning, it is not possible to conduct site-specific analyses of development activities in relation to the small, dispersed BLM unencumbered land and the extensive community subsistence use areas. Site-specific environmental reviews will, however, accompany project permit applications when those occur. In all, at this stage of planning, it is appropriate and reasonable to conclude that low development potential (affecting low total acreage) dispersed across the large planning regions will effect no more than a few percent of village traditional subsistence use areas. This does not constitute a significant restriction on subsistence resources, uses, or access.

Subsistence

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 72	<p>The section of the Draft RMP/EIS that explained the direct and indirect effects on subsistence common to all alternatives was stunningly lacking in detail. For example, although the subsection on leasable, locatable and salable minerals indicated that exploration and prospecting activity would negatively impact subsistence, it failed to provide any detailed analysis of what those impacts would be. This subsection also failed to provide a meaningful discussion of the amount of exploration, prospecting, blasting, road building, or competition that may occur as a result of these activities.</p> <p>Similarly, the subsection on forestry management found that the impacts of the planned activities would "be minor in scale." However, this subsection failed to provide a meaningful discussion of the amount of habitat modification or herbicide and insecticide application that is likely to occur. Nor did it indicate where those activities would take place or how repeated or widespread they would be. It contained no detailed analysis of how or to what extent they would negatively impact subsistence.</p>	<p>More detailed information on development activities is found in the subject matter sections in the Proposed RMP/Final EIS, and this was the basis for the conclusions drawn in the Section 810 analysis. Appendix G provides a detailed account of oil and gas resource and development potential, supporting the estimate of 2600 acres affected. Discussion of the likely extent of timber development is found in Section 4.2.4, supporting the estimate of 20 acres disturbance per year, primarily on BLM lands in the Matanuska-Susitna Valley and the Kenai Peninsula, with little road construction activity. Based on the low resource potential and historic rates of activity, the planning estimate does not predict intensive silviculture applications, such as herbicide and insecticide. Additional discussion of development activities, broken out for the four planning regions, was taken from the subject matter sections in Chapter 4 and included in the Section 810 analysis. The underlying analysis of no significant impacts remains justified.</p>
119 - 73	<p>Pursuant to ANILCA § 810, BLM is required to evaluate whether its land-use decisions in Alaska will significantly restrict subsistence uses and resources, to consider alternatives, and to minimize impacts on subsistence. BLM, however, failed to provide adequate foundation for this "tier-I" subsistence analyses.</p>	<p>The Section 810 analysis evaluated the potential to significantly restrict subsistence uses on BLM unencumbered lands, based on the subject matter expert accounts of likely key development activities (minerals, timber, OHV) and impacts to key subsistence resources, (fisheries and aquatic habitat, and wildlife). Additional discussion of development activities, broken out for the four planning regions, was taken from the subject matter sections in Chapter 4 and included in the Section 810 analysis of the PRMP/FEIS. The underlying analysis of no significant impacts remains justified.</p>

Subsistence

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 74	<p>BLM provided substantial discussion and analysis of subsistence activities in the planning area, i.e., it specified where these activities take place, historically and presently, the important subsistence species in each local area, what access is required, and the nature of the subsistence uses and resources. It also stated that under all alternatives and the cumulative case “[t]imber development, realty actions to grant rights-of-way (ROW), mineral development, OHV management, and growing recreation, all have the potential to adversely affect subsistence uses.” Draft RMP/EIS at I-5. BLM then ignored the question of how these activities, individually or cumulatively, would impact subsistence use and access on local levels (as opposed to the planning area as a whole). Because subsistence is a local activity, this localized information is critical to a proper analysis.</p> <p>At a minimum BLM should have described where the proposed activities, such as timber development, realty actions to grant rights-of-way, mineral development, OHV management, and growing recreation would occur in relation to subsistence resources and activities. For each of the alternatives, BLM should have analyzed and discussed the extent to which these activities would conflict with subsistence uses, resources and access. It failed to do so.</p>	<p>The comment rightly quotes the Section 810 analysis noting the general potential for many activities to restrict subsistence uses, but neglects the subsequent qualification that the “extent of these effects depends upon the configuration of BLM-management lands in relation to community subsistence use areas, BLM management actions to authorize or regulate activities, and the resource potential to support development” (Appendix I). More detailed information on the scale and configuration of development activities is found in the subject matter sections in the Proposed RMP/Final EIS, and this was the basis for the conclusions drawn in the Section 810 analysis. As an example, Appendix G provides a detailed account of the oil and gas resource and development potential, supporting the estimate of 2600 acres affected. Additional discussions of development activities in each of the planning areas were taken from the subject matter sections in Chapter 4 and included in the Section 810 analysis in the PRMP/FEIS. A regional level of analysis, for the four planning regions, is appropriate for the purposes of the plan. Site-specific analyses of development activities in relation to the small portion of BLM unencumbered land and the extensive community subsistence use areas cannot be performed for the non-site specific estimates of development activities. Site-specific environmental review would accompany project permit applications when those occur.</p>
119 - 75	<p>In making a decision, such as a finding of no significant restriction of subsistence uses, resources and access, an agency must examine the relevant data and articulate a satisfactory explanation for its action including a “rational connection between the facts found and the choice made.” Motor Vehicle Manufacturer’s Ass’n v. State Farm Auto. Ins. Co., 463 U.S. 29, 43 (1983). Instead, BLM made broad generalizations to support its findings that no significant restrictions to subsistence would result from the activities proposed under any of the alternatives. For example, each of the alternatives proposed opening about 2,600 acres of BLM land to mining, oil and gas, or associated road development. See Draft RMP/EIS at 4-126, 127, 129, 131. BLM provided no detailed analysis of the effects on subsistence resources, use and access associated with these activities. Instead, it simply stated that “only a small portion of the subsistence resources and use on BLM-managed lands may be affected.” See Draft RMP/EIS at 4-126, 127, 129, 131. Such paucity of information and analysis cannot support BLM’s decision that there would be no significant restriction on subsistence under any of the alternatives.</p>	<p>BLM is committed to conclusions that follow in a rational fashion from the facts identified and disagrees with the view that the conclusions of the Section 810 analysis are not rationally founded. The cited portion of the Draft RMP/EIS (i.e. pages 4-126, 127, 129, and 131) refers to general potential impacts from oil and gas development activities drawn from the very different context of the North East National Petroleum Reserve Alaska, and not qualified as to the land status and likely scale of development in the Ring of Fire Planning area. When the Ring of Fire planning area context is taken into account, the conclusion properly drawn is that impacts are minimal and highly localized in scale. Additional discussion of development activities in each of the planning areas was taken from the subject matter sections in Chapter 4 and included in the Section 810 analysis of this PRMP/FEIS.</p>

Subsistence

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 76	<p>Moreover, the destruction of a “small portion of subsistence resources” could be the difference between feast and famine for subsistence users that rely on that area for their subsistence activities.</p> <p>For example, Alternative B would have the greatest impact on subsistence resources. It would open almost all unselected lands to oil and gas leasing and development, open to mineral development all lands withdrawn pursuant to Section 17(d)(1) of the Alaska Native Claims Settlement Act (ANCSA), and open all BLM-managed lands to OHV use. Draft RMP/EIS at 2 3. It would open as many as 2,600 acres of BLM land to mineral, oil and gas development and road building. Draft RMP/EIS at 4-126. Although BLM found that “the effect of Alternative B to subsistence would be greater than that of any of the other alternatives,” it stated that those impacts “would remain localized and would not significantly affect subsistence species or resources on a population scale.” Draft RMP/EIS at Appendix I-8. This conclusion, without more support, defies logic.</p> <p>Additionally, BLM predicted that, under Alternative B, “the loss of access to lands presently under BLM management could reduce or block subsistence user access to harvest locations and traditional camps and sites.” Draft RMP/EIS at 4-126. This alone could prove to be a significant restriction of subsistence uses, resources and access.</p>	<p>Agree with commenter that all subsistence resources are important, but disagree with proposition that the level of disturbance reviewed in this plan could result in famine for subsistence users in region. Estimated levels of activity in Alternative B are detailed in the subject matter sections of the PRMP/FEIS, based on careful assessment of resource endowments, historic levels of activity, market pressures and logistical challenges. Details on likely levels of development and locations for mineral development are found in Appendix G, including the estimate that this development would amount to approximately 2600 acres of land, not only those managed by BLM, and only within Southcentral Alaska. The depiction of the Cook Inlet Oil and Gas Basin in Appendix G (Attachment A), shows little overlap between this basin and the BLM managed lands in Southcentral Alaska. The quoted sentence of concern on page 4-126 of the Draft RMP/EIS refers to possible impacts, but in the following paragraph the potential effect is qualified in reference to the limited development potential on BLM lands, with somewhat greater risk of impacts on lands conveyed to Alaska Native corporations. More detail has been added the Section 810 assessment of Alternative B to clarify the basis for the conclusion that the estimated activities will not significantly restrict subsistence uses.</p>
119 - 77	<p>Alternative D, BLM's preferred alternative, also proposed revoking all 17(d) (1) withdrawals. Draft RMP/EIS at 4-130. The level of development potential, and overall effects for leasable, locatable, and salable minerals would be similar to that in Alternative B. Id. Like Alternative B, some or all of these 17(d)(1) lands, which are presently under BLM management, would be off limits to subsistence users, eliminating or reducing their access to harvest locations and traditional camps and sites.⁴ To comply with its obligations under Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA), BLM must provide a detailed discussion and analysis of the restrictions on subsistence that would result. It failed to do so.</p>	<p>The detailed analysis of mineral development potential, if the 17(d)(1) withdrawals are revoked, concluded that impacts would occur on approximately 2600 acres of land across the planning region, not just on BLM managed lands, most likely in the Southcentral region. Considering that this would represent less one half of one percent of the land opened by the revocation (if it all occurred on BLM-managed land), it is hardly reasonable to assert that “some or all of these 17(d)(1) lands...would be off limits to subsistence users.”</p>

Subsistence

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 78	BLM provided no support for its finding that Alternative D "would have a negligible effect on subsistence species, access to subsistence resources, or subsistence uses. The effects would be localized, of short duration, and would not significantly affect subsistence species or resources on a population scale."	More detailed information on development activities is found in the subject matter sections in the Proposed RMP/Final EIS, and this was the basis for the conclusions drawn in the Section 810 analysis. Appendix G provides a detailed account of oil and gas resource and development potential, supporting the estimate of 2600 acres affected. Discussion of the likely extent of timber development is found in Section 4.2.4, supporting the estimate of 20 acres disturbance per year, primarily on BLM lands in the Matanuska-Susitna Valley and the Kenai Peninsula, with little road construction activity. Additional discussion of development activities, broken out for the four planning regions, has been taken from the subject matter sections in Chapter 4 and included in the Section 810 analysis. The underlying analysis of no significant impacts remains justified.
119 - 79	It provided no information on the Stipulations and Required Operating Procedures (ROPs) that it claimed would "ensure that significant reduction to subsistence species and resources is unlikely to occur" in finding that Alternative D would not significantly restrict subsistence uses.	Comment acknowledged and additional details from Appendix D on ROPs and stipulations have been added to the Proposed RMP/Final EIS. All permitted activities, including timber and mineral development, are subject to the required operating procedures, including 15 standards to protect soils from erosion, and 20 standards to protect fish and wildlife from disturbance and adverse impacts. Key examples include standards for stream crossings (FWH-3), sets backs from fish-bearing streams and lakes (FWH-6), and buffers from water bodies in timber sales (FWH-10).
119 - 80	To comply with its ANILCA mandates and to allow informed decision-making and public participation, BLM must provide more analysis. It must indicate where the almost 2,000 acres of mineral extraction, as well as the other activities anticipated under this alternative, would occur in relation to subsistence resources and activities and the extent to which they would conflict.	Areas of potential mineral development are identified in Chapter 4.2.4 within the discussion of Locatable Minerals. ROPs and stipulations are the minimum guidelines that will be used to ensure that resource impacts will be mitigated, on a site-specific basis, during the NEPA process associated with the Plan of Operations review and approval. Mineral activities will be required to follow BLM 3809 Regulations as well as federal and state laws and regulations. There is flexibility built into the ROPs so that site-specific analysis and subsequent remedial measures will provide mitigation for the particular proposed project.

Subsistence

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 82	<p>BLM should provide more analysis to support its conclusion that the cumulative case would "have no or negligible additive impact on subsistence resources and their habitats, or on subsistence uses of the unencumbered BLM lands." See Draft RMP/EIS at I-13. The proposed Pebble Copper mining prospect, proposed State of Alaska oil and gas leases, the Kensington and Jualin mines, and heli-skiing operations on the Kenai Peninsula and near Haines may have significant impacts on subsistence species and access. Draft RMP/EIS at I-12. Thus, incremental changes may impose a significant restriction on subsistence resources and BLM's finding of no significant restriction is unsupported.</p>	<p>The assessment of the cumulative effects case for subsistence in the Section 810 analysis builds upon the cumulative effects analysis of key subsistence resources and habitat elements in Section 4.4. Additional details from the discussion of cumulative effects on fisheries and aquatic habitat, wildlife, and subsistence have been added to the PRMP/FEIS. These cumulative effects analyses conclude that activities under the provisions of the Ring of Fire PRMP/FEIS would make minor contribution to overall regional cumulative effects, given the limited development potential and small, dispersed scale of BLM managed lands. The limited proximity of the most significant RFFAs to BLM lands and community subsistence use areas supports the conclusion that together the BLM managed or permitted activities and the RFFAs will not significantly restrict subsistence uses on the unencumbered BLM lands.</p>
119 - 83	<p>As for BLM's second obligation under tier-I, which requires it to assess whether other lands are available for the purposes it seeks to achieve in each of the alternatives, BLM summarily found "that three are no other lands available for the BLM land management purposes sought to be achieved. See, e.g., Draft RMP/EIS at I-10. Such a conclusion, without illuminating how the agency reached its decision and what alternatives it considered, is inadequate and an end-run around the requirement that BLM seriously consider other lands for the purposes it seeks to achieve. See Instruction Mem. at 1-2. Without further information, and a detailed discussion of the activities planned under each alternative, it is not possible for BLM or the public to evaluate the adequacy of the foundation for this determination. BLM should provide the analysis underpinning its decision in adequate detail.</p>	<p>The comment misconstrues the requirement for consideration of "other lands" in the tier-I Section 810 analysis, when the proposed activity under review is a plan for all BLM-managed lands in an area. By definition the PRMP/FEIS addresses all BLM-managed lands within a planning region, and so no other lands in the planning region can be identified as alternatives for BLM activities. The four alternatives in the PRMP/FEIS represent a reasonable spectrum of planning approaches, with varying degrees of authorization and management provisions for a large set of activities. The analysis of these alternatives represents a rational process of considering alternative lands for the various development activities under review in the planning area.</p>

Subsistence

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 84	<p>Finally, in discussing the third prong of the tier-I analysis, the alternatives that would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes, BLM simply stated that "the only alternative that would completely eliminate the use of public lands needed for subsistence would be an alternative that prohibited any activities that conflicted with subsistence uses on the lands used for that purpose." See e.g. Draft RMP/EIS at I-9. BLM then cited its legal mandates as preventing such an action. Id. BLM should not cast the third prong as a paradox: that to eliminate threats to the use, occupancy or disposal of land needed for subsistence, the agency would have to prohibit all other uses of the land. BLM provided no foundation for its decision to ignore the other criteria: that it examine alternatives that reduce the use, occupancy or disposition of those lands. The agency's internal guidance instructs it to evaluate alternatives that "are other ways to accommodate the proposed action or other actions," Instruction Mem. at 1-4. It failed to do so.</p>	<p>Comment acknowledged and language revised to emphasize that the range of alternatives reviewed in the plan constitute an analytically sound effort to identify contrasting management approaches to development activity, with some alternatives reducing or eliminating some uses. It is not logical to propose that each of the four alternatives should be subject to additional development and review in the form of alternatives to the alternatives.</p>
119 - 86	<p>BLM found that there would be no significant restriction (FONSR) on subsistence uses and resources for each of its alternatives, including the cumulative effects of each alternative. By issuing a FONSR for all the alternatives, BLM avoids the need to conduct tier-II analyses, which would require the agency to give notice of and hold public hearings, and make specified findings about, inter alia, the propriety of the proposed action and the measures that would be taken to mitigate adverse impacts on subsistence uses and resources. Because BLM's analysis lacked detailed information on potential impacts on specific subsistence resources, uses and access, it failed to provide adequate support its conclusions. Before issuing a Final RMP/EIS, BLM must provide additional support for its FONSR.</p>	<p>The analysis of impacts to subsistence uses is based on the merits of the resources assessment, development probabilities, land status, and subsistence use patterns, not on an effort to avoid public hearings on subsistence impacts. The BLM routinely conducts such hearings in other planning and environmental review cases, where the nature of the proposed activities and impacts warrant a finding of "may significantly restrict subsistence uses." More detailed information on development activities is found in the subject matter sections in the Proposed RMP/Final EIS, and this was the basis for the conclusions drawn in the Section 810 analysis. Appendix G provides a detailed account of oil and gas resource and development potential, supporting the estimate of 2600 acres affected. Discussion of the likely extent of timber development is found in Section 4.2.4, supporting the estimate of 20 acres disturbance per year, primarily on BLM lands in the Matanuska-Susitna Valley and the Kenai Peninsula, with little road construction activity. Additional discussion of development activities, broken out for the four planning regions, has been taken from the subject matter sections in Chapter 4 and included in the Section 810 analysis. The underlying analysis of no significant impacts remains justified.</p>

End of section on Subsistence

Threatened and Endangered Species

Comment #	Comment	Response
13 - 7	And also we ask that anything that is potential Stellar's Eider habitat on the Alaska Peninsula is managed as such. Seems that on the maps the Stellar Eider identified habitat seems to stop at the BLM boundaries of the land, so we are not sure if that means you guys don't know if they are there yet or if they haven't been documented yet, but I'd like to go ahead and assume that they are present until proven absent and managed as such.	The Steller's eider important habitat in the Ring of Fire planning area consists only of the marine waters offshore of the Alaska Peninsula in three locations, as established by the USFWS. These sea ducks do not come ashore in the winter so there are no BLM lands where they are actually present. BLM will assess the potential for land use activities on adjacent BLM lands that may affect these marine waters on a case-by-case basis, using the NEPA process.
22 - 11	2. Trumpeter swans listed as a 'sensitive species' in the plan indeed depend upon the Knik valley.	Trumpeter swans are listed as a BLM sensitive bird species. They are also resident species of the Southcentral region of the Ring of Fire planning area (Chapter 3). Section 4.3.1.5.1 of the PRMP/FEIS discusses specific management objectives for BLM sensitive species that are common to all alternatives. Future management of this species in the Knik River SRMA will be addressed in implementation level planning.
119 - 59	For species listed as endangered or threatened under the ESA, BLM must formally consult with the Fish and Wildlife Service when taking any action that may affect the critical habitat of those species. 16 U.S.C. § 1536(a)(2) (2004). The ESA requires all Federal agencies to seek to conserve endangered and threatened species. It also requires all Federal agencies to avoid jeopardizing the continued existence of any species that is listed or proposed for listing as threatened or endangered, and to avoid destroying or adversely modifying a listed species designated or proposed critical habitat.	BLM agrees and does consult with USFWS regarding matters pertaining to threatened or endangered species. Under all management alternatives of this Proposed RMP/Final EIS, BLM will ensure that actions authorized by BLM are consistent with the conservation needs of Alaska BLM special status species and do not contribute to the need to list any special status species under the provisions of the Endangered Species Act (ESA) of 1973, as amended (see 2.4.5.2 of the Proposed RMP/Final EIS). The Biological Assessment is being prepared as part of this planning process.

Threatened and Endangered Species

Comment #	Comment	Response
119 - 60	<p>BLM Manual 6840 contains BLM's policy for species listed as threatened or endangered under the ESA as well for species that are candidates for listing. With respect to candidate species, BLM employees must "implement management plans that conserve candidate species and their habitats and . . . ensure that actions authorized, funded, or carried out by the BLM do not contribute to the need for species to become listed." See BLM Manual 6840.06C, Special Status Species Management.</p> <p>Where BLM authorized actions have a "significant effect" on the candidate species status, BLM shall manage the habitat to conserve the species by "implementing range-wide or site-specific management plans, conservation strategies, and assessments for candidate species." The agency must ensure that "BLM activities affecting the habitat of candidate species are carried out in a manner that is consistent with the objectives for managing those species," and monitor "populations and habitats of candidate species to determine whether management objectives are being met." BLM Manual 6840.06(C)(2).</p> <p>BLM Manual 6840.06B, Special Status Species Management, directs agency personnel to consider the needs of candidate species in land use plans. It also directs BLM to develop range-wide or site-specific conservation strategies for each candidate species. With respect to species proposed for listing as threatened or endangered, BLM must manage the species, as well as designated and proposed critical habitat, with the same level of protection provided for listed species except that formal consultations are not required.</p>	<p>BLM agrees. Under all management alternatives of this Proposed RMP/Final EIS, BLM will ensure that actions authorized by BLM are consistent with the conservation needs of Alaska BLM special status species and do not contribute to the need to list any special status species under the provisions of the Endangered Species Act (ESA) of 1973, as amended (see 2.4.5.2 of the Proposed RMP/Final EIS). The Biological Assessment is being prepared as part of this planning process.</p>
119 - 61	<p>The Draft RMP/EIS contains a map that shows that Izembek Lagoon's federally recognized Critical Habitat for Steller's Eider and Steller Sea Lion is located directly adjacent to unencumbered BLM lands near Cold Bay. See Draft RMP/EIS Figure 2.3-9. However, BLM failed to provide maps that depict the BLM-managed lands contiguous with Nelson Lagoon and near the Seal Islands. The draft plan also lacks discussion of BLM's management plans for these threatened species.</p>	<p>The Biological Assessment is being prepared as part of this planning process, and will contain maps depicting Steller's Eider and Steller Sea Lion habitat. Future projects are subject to the NEPA process, which will evaluate the potential effects of these proposals and actions on threatened species, and develop mitigation measures specific to the proposal and location to reduce or eliminate actions that may impact individuals or adversely modify or destroy important habitat. The Proposed RMP/Final EIS includes protective measures (ROPs, stipulations, and lease terms) to reduce or eliminate impacts to fish, wildlife, and vegetation. These protective measures apply to Threatened species and combined with BLM's requirements under Section 7 of the ESA provide adequate management direction to prevent BLM actions adversely affecting threatened species.</p>

Threatened and Endangered Species

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 62	The Draft RMP/EIS should have described the species inventories that have been conducted to document the presence or absence of listed species or those that are proposed for listing. It should have indicated whether BLM, the U.S. Fish and Wildlife Service or other federal agencies have even conducted such inventories on BLM lands and nearby Native selected lands. The BLM should have described in the Draft RMP/EIS the size and location of Critical Habitat for the Steller's Eider and Steller Sea Lion, whether documented or undocumented, on BLM-managed lands in the planning area. At a minimum, BLM must include a discussion of the results of these surveys in the Final RMP/EIS.	The Proposed RMP/Final EIS will include descriptions of inventories conducted by USFWS to determine the distribution and abundance of Steller's Eiders and Steller Sea Lions in the planning area
119 - 63	If special status species inventories have not yet been completed, as required by the ESA, BLM should specify how and when it intends to do so. Special status species inventories should be high priority projects for the upcoming field seasons, and BLM should ensure they are sufficiently funded. BLM must clearly identify the presence and needs of Steller's Eider and Steller Sea Lion populations and habitat on BLM managed lands. BLM it must institute protective management controls before it permits any new development activities on the Alaska Peninsula.	Please see response to comment 13-7 under Threatened and Endangered Species.
119 - 64	As documented by the Draft RMP/EIS, most of the Pacific population of Steller's Eider migrates to wintering grounds in the Ring of Fire planning area. If BLM cannot dedicate sufficient resources to monitor and manage the Eider's potentially critical habitat as such, we believe that BLM should convey its unencumbered on the Alaska Peninsula to either the U.S. Fish and Wildlife Service or the National Park Service.	All known use by this species within the planning area occurs on land or water not managed by BLM. No designated Critical Habitat overlays BLM-managed lands. All designated Critical Habitat in the Ring of Fire planning area is marine. Transfer of land ownership on the Aleutian Chain is an ongoing activity. There are no lands on the Aleutian Chain that are unencumbered- all lands fall within the various Wildlife Refuges, or selected by Native corporations or the State of Alaska (or both). BLM will continue to satisfy these entitlements as part of the Alaska Land transfer Program. Conveyance of BLM unencumbered lands to the USFWS or the NPS would not automatically result in improved monitoring or management of the land relative to the Steller's Eider. Currently, USFWS' migratory bird management division conducts inventories of this species annually and provides the collected data to BLM for use in management decisions.

Threatened and Endangered Species

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 65	In its Alaska Peninsula and Bristol Bay Basin Ecoregional Assessment, The Nature Conservancy identified bird habitat in the Port Heiden area as critical to many species, including the Steller's Eider and Beringian marbled godwit. Barbara and Reindeer creeks and neighboring shorelines are a "highly productive food base" that supports these waterfowl and shorebirds. Audubon Alaska and The Nature Conservancy agree that the Port Heiden region is a "core area" of biological significance. ² The State of Alaska has designated the Port Heiden region as a State Critical Habitat Area, recognizing the importance of protecting these waterfowl and shorebird populations. ³ The Nature Conservancy also identified the Port Moller area, located to the north of the BLM administered lands, as a "core area" of biological significance. Thus, BLM must closely monitor for trends and fluctuations these sensitive bird populations on BLM shores.	Within its management plans, BLM has objectives to manage wildlife habitat to meet the goals of BLM's National Fish and Wildlife 2000 initiatives, ADF&G management plans (Port Moller is also a Critical Habitat Area), federal subsistence mandates, and BLM Alaska Statewide Land Health Standards. Among these objectives are to inventory and monitor BLM-managed lands to determine the status and distribution of sensitive species and their habitats. Please see Section 4.3.1.5.1 of the Proposed RMP/Final EIS for more detail. BLM manages about three and seven miles of Barbara and Reindeer Creeks, respectively, in a manner consistent with fish and wildlife plans. However, BLM is not required to conduct inventories for Special Status Species (i.e., threatened or endangered). These inventories, including habitats within the planning area for Steller's Eiders, are conducted annually by USFWS migratory bird management.

End of section on Threatened and Endangered Species

Vegetation

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
32 - 5	While some say that this area is nothing but sand and rock, nothing could be farther from the truth, as most of the area is vegetated and wet lands. Please review the attached pictures and the captions.	Thank you, comment acknowledged.
119 - 128	BLM should develop guidelines for rehabilitation and re-vegetation in open areas to minimize the introduction of noxious weeds and non-native plants.	It is a BLM objective to promote healthy, sustainable, fully functioning ecosystems. Included in this will be management to prevent the spread of invasive plant species, including noxious weeds. Desired ecological conditions for vegetation are described in the BLM Alaska Statewide Land Health Standards (BLM 2004u). See Section 2.5.13 of the Proposed RMP/Final EIS.

End of section on Vegetation

Visual Resources

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
13 - 4	And I believe that the VRM Class 1 should be applied to Neacola Mountains in certain areas. Potentially VRM Class 2 could be appropriate, but overall, especially in the Blockade Glacier area, there doesn't really seem to be any reason why VRM Class 1 wouldn't be upheld easily enough. I don't know of any proposed development out there, really any interest in it that would drop it down from its current classification, which is incredibly primitive and undeveloped.	The visual resources of the Neacola Mountains were inventoried and classified in accordance with procedures outlined in the BLM Handbook 8410-1 and summarized on page 3-104 of the Draft RMP/EIS. Under the Proposed Action (D), the Neacola Mountains ACEC will be managed as a VRM Class II. This area was assigned this class based on the value of the visual quality and anticipated future land uses. Visual resource classifications were assigned based on our analysis of the areas and the application of BLM's VRM criteria.
54 - 5	Furthermore we ask that VRM Class II be applied to the entire Neacola ACEC areas.	Please see response to comment 53-4 under Special Management Areas.
78 - 5	I encourage the BLM to recognize and protect the scenic beauty of these two areas from any industrial exploitation in order to allow our children to enjoy these lands in their natural wild state, as I have.	The visual resources of the Neacola Mts. were inventoried and classified in accordance with procedures outlined in the BLM Handbook 8410-1 and summarized on page 3-104 of the Draft RMP/EIS. BLM is confident that under the Preferred Alternative (D), VRM Class II would be an appropriate level of management for the Neacola Mountains ACEC. Development, where allowed, would be subject to the ROPs and STIPs in Appendix D which are the minimum guidelines that will be used to ensure that resource impacts will be mitigated, on a site-specific basis, during the NEPA process associated with the Plan of Operations review and approval. Additionally, commercial activities would be subject to permitting and consultation requirements under the Clean Water Act, Clean Air Act, Migratory Bird Treaty Act, and other local, state, and federal requirements.
86 - 4	Additionally, Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	The Proposed Action (D) would designate the Neacola Mountains as an ACEC with a VRM Class of II.
93 - 3	Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Please see response to comment 53-4 under Special Management Areas.

Visual Resources

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
94 - 4	The Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Please see response to comment 53-4 under Special Management Areas.
99 - 4	Additionally, Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Please see response to comment 53-4 under Special Management Areas.
100 - 4	Additionally, Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Please see response to comment 53-4 under Special Management Areas.
101 - 4	I also believe that Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Please see response to comment 53-4 under Special Management Areas.
104 - 4	Additionally, Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Please see response to comment 53-4 under Special Management Areas.
106 - 4	Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Please see response to comment 53-4 under Special Management Areas.

Visual Resources

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
107 - 4	Visual Resource Management Class II should be applied to the Neacola Mountains ACEC, as this will provide sufficient management tools for preserving and enhancing the scenic beauty of the area.	Please see response to comment 53-4 under Special Management Areas.
109 - 3	The Neacola Mountains ACEC should fall under Visual Resource Management Class II.	Please see response to comment 53-4 under Special Management Areas.
110 - 5	Furthermore we ask that VRM Class II be applied to the entire Neacola ACEC areas.	Please see response to comment 53-4 under Special Management Areas.
119 - 66	We support the proposal to assign Visual Resource Management (VRM) Class II to the Neacola Mountains ACEC. VRM Class II will provide appropriate management tools and guidance for mitigating impacts from recreational OHV use and development activities. We recommend that VRM II standards be enforced in land use decisions to reflect BLM's commitment to protect and enhance the area's exceptionally high scenic values.	See response to comment 53-4 under Special Management Areas.
119 - 67	We recommend that BLM assign VRM Class II to the Haines SRMA designation in the Final RMP/EIS to retain and preserve the existing undeveloped characteristics of the visual resources. By contrast, a VRM Class IV designation, according to BLM VRM guidance materials, may "provide for management activities that require major modification to the existing character of the landscape." This would only require BLM to establish a few guidelines to prevent permitted surface-disturbing activities from causing high levels of change to visual resources in areas where there are only minor, if any, existing scenic impacts. Such lenient allocations for the management of surface disturbing activities, such as mineral development and OHV use, as proposed in the Preferred Alternative would be inappropriate.	<p>The visual resources of the planning area were inventoried and classified in accordance with procedures outlined in the BLM Handbook 8410-1 and summarized on page 3-104 of the Draft RMP/EIS. BLM is confident that under the Proposed Action (D), the VRM classifications of II (Neacola Mountains ACEC, Lake Carlanna, and Halibut Cove Forest Study Area) and IV (all other lands) would be an appropriate level of management for the planning area.</p> <p>All surface-disturbing activities are required to go through a NEPA process, which provides additional opportunity to mitigate potential impacts and are subject to the application of the ROPs and stipulations.</p> <p>Visual resource classifications were assigned based on our analysis of the areas and the application of BLM's criteria.</p>

Visual Resources

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 68	<p>Most of the planning area is currently undisturbed and could be classified through Scenic Quality Ratings as meeting VRM Class I and II criteria, especially when compared on a national scale to public lands in the contiguous United States. BLM guidance materials explain that VRM Class V is “applied to areas where the natural character of the landscape has been disturbed to a point where rehabilitation is necessary to bring it up to one of the other four classifications.” Allowing BLM public lands to be degraded to VRM Class IV standards means that they will be only one step away from requiring major “rehabilitation.” Once natural scenery is damaged, it can never be fully restored.</p> <p>We recommend that BLM uphold strong VRM goals, and apply the VRM Class I, II and III standards. These principles will minimize the occurrence of devastation of BLM lands, and minimize the impact of activities that would otherwise diminish scenic values to a point where major rehabilitation would be required. We believe that VRM Class IV is a far too lenient management standard in that it fails to adequately protect visual value, the natural character and the scenic beauty of the vast majority of lands in the planning area.</p>	Please see response to comment 119-67 under Visual Resources.
119 - 69	<p>We understand that BLM will continue to make VRM decisions on a case-by-case basis for proposed activities. Above all, we encourage BLM to require permitted operators to minimize the impacts of surface-disturbing activities on the scenic resources of all public lands, especially within the Neacola Mountains ACEC, the Haines area, and lands adjacent to the highways and commercial flight paths. Any permitted activities must be designed to minimize damage to the landscape so that they do not attract attention or visually clash with the adjacent scenery.</p>	Please see response to comment 119-67 under Visual Resources.

End of section on Visual Resources

Wildlife

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
1 - 2	And so I'd like to see the – if they're going to be – if mountain goats are going to be considered as a wildlife and whether we should have helicopters, I think there should be some serious studies; not some just marginal opinions.	Please see response to comment 34-11 under DOI/BLM Compliance.
1 - 5	We need some serious "has helicopters affected goats in other areas," rather than just a bunch of comments and taking them when they have no value if they don't have any proof.	Please see response to comment 34-11 under DOI/BLM Compliance.
4 - 3	And swans are supposed to be protected, and when they're setting off fireworks at Swan Lake, 4th of July two years ago, and they drove the swans off the nest and the babies could not fly or get out yet.	Thank you, comment acknowledged.
28 - 3	Nor does it address the need for other wildlife to den, forage, hunt and migrate, such as moose, fox, coyote, and wolf during the alternative months without disturbance from extraction/development activity.	<p>Section 4.3.1.5 of the PRMP/FEIS mentions possible adverse effects to wildlife species and important habitat, such as wildlife displacement as the result of direct habitat loss. Also, the PRMP/FDEIS classifies lands for various purposes, but does not authorize any activities. Future proposals will be subject to the NEPA process and the application of the ROPs and stipulations.</p> <p>Lessees and operators have the responsibility to see that their exploration, development, production, and construction operations are conducted in a manner which conforms with applicable federal laws and regulations, and with State and local laws and regulations to the extent that such State and local laws are applicable to operations on federal leases. BLM permitting approval does not alleviate operators from the requirements of obtaining necessary permits from other entities such as the State, other federal agencies or boroughs. It is the ultimate responsibility of lessees and operators to comply with regulations outside the jurisdiction of BLM.</p> <p>Please also see response to comment 28-4 Leasable Minerals.</p>

Wildlife

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
29 - 6	In section 1.3.1 the draft states "...degradation of natural resources has occurred, including impacts to habitat for runs of red and silver salmon and for waterfowl." We're concerned with the implication that the fish and wildlife in this area are negatively impacted in a significant way. According to the State Department of Fish and Game who actively manages fish and game including salmon, waterfowl and large game, they have not determined a significant impact and have written documentation to that effect. In fact, salmon fishing and waterfowl hunting is widely considered to be healthy in the area. We're requesting that the draft include some language that require objective and professional analysis such as by the Alaska Department of Fish and Game for determining any detrimental impact to those natural resources. Also that any limitation imposed to protect natural resources be only as a result of significant declining population numbers as documented by state or federally funded biologists assigned to the area.	The cited comment is a summary of the issue as identified by the public and internal scoping process. It is not an evaluation of the scope, scale, or severity of the perceived impact. The PRMP/FEIS does include language explaining the incorporation of fish and wildlife data from the Alaska Department of Fish & Game. In 1983, a Master Memorandum of Understanding (MOU) BLM and ADF&G agreed to recognize their respective roles in managing fish and wildlife resources and their habitat. According to the MOU, BLM agreed to recognize ADF&G as the primary agency responsible for management of use and conservation of fish and wildlife resources on federal lands (see 1.5.2 of the PRMP/FEIS). As a multiple use and management agency, BLM cannot state that the only limitations imposed to protect natural resources will be the result of documented population declines, as a preemptive management might be appropriate to a particular situation.
29 - 9	Regarding the Neacola Haines and Skagway areas and potential limitations to helicopter and other back country means of access, we are fundamentally opposed to restrictions that may not be based totally on fact. We understand limitations where fish and game species in a given area are proven to be negatively impacted in a measurable and significant way. However, when allegations of long-term impact to species such as goats have not been proven, we oppose restrictions to alleviate or study alleged impact. We do feel that allegations must be supported by objective analysis from state or federally funded wildlife biologists before imposing any restrictions.	BLM agrees that any policy changes should be supported by objective analysis. BLM has compiled mountain goat data gathered during this project. BLM will consider the data, to the extent that the data are pertinent and useful, in the development of the implementation plan for the Haines area. More studies or further analysis may be forthcoming. Please also see response to comment 34-11 under DOI/BLM Compliance.
34 - 13	For the above reasons, we request BLM's ten years of goat monitoring data be analyzed and that analysis be included in a SDEIS.	Please see response to comment 34-11 under DOI/BLM Compliance.
34 - 34	3) Long term wildlife monitoring is essential and also needs to include monitoring the permitted activity for compliance with restrictions. Also essential is providing control areas against which impacts can be measured. Special recreation permit fees should be sufficient to fund compliance monitoring and data collection.	Currently BLM uses revenue from Special Recreation Permit fees to finance compliance and monitoring activities associated with those permits that generate returns. Permit fees are often not sufficient to fully fund these compliance and monitoring activities.

Wildlife

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
40 - 2	Haines has outstanding mountain goat resources that need an appropriate management designation for protection.	BLM agrees with the importance of the mountain goat resources in this area. See response to comment 34-11 under DOI/BLM Compliance.
40 - 5	3) BLM should analyze their data from 10 years of goat monitoring before issuing any heli-recreation permits and before designating a large area of goat habitat for heli-recreation.	Please see response to comment 34-11 under DOI/BLM Compliance.
43 - 6	Mountain goats are ruminants, which means that they eat a lot of food rather quickly and then do the real chewing later on, while they're resting. Bacteria in the rumen break down the chewed food, convert it to sugars and proteins and so on that the goat can digest, and produce a lot of heat in the process. Ruminants are not well designed for running and mountain goats in particular aren't. They eat very large quantities of very rough food: relative to their bodyweight they eat three or four times as much as sheep or cows do. That much fermenting forage plus a kid or two and an incredibly heavy warm coat means that they're about as likely to run as a woman in late pregnancy carrying triplets. As a comparison, horses are not ruminants, eat relatively much smaller quantities of much higher-quality food, and do run when frightened.	Thank you, comment acknowledged.
43 - 7	It's helpful to know this basic biology because it explains why heliskiers think that mountain goats aren't bothered by helicopters. I've heard heliskiers say that they had flown over to about 200' of mountain goats, and "the goats weren't bothered at all". But goats will always stand and face a threat; it's basic goat behavior. It certainly doesn't suggest that the goat doesn't mind or isn't affected.	Thank you, comment acknowledged.

Wildlife

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
43 - 8	<p>Zoos everywhere have come to understand that pregnant animals have to be shielded from stress. Stresses can vary I as can reactions, but diet, lack of privacy, and noise are some of the best documented problems. Effects of the stress can include infertility, miscarriage, stillbirth, suppressed lactation, abandonment and outright killing of the baby. In the wild all you would be likely to see would be lower overall reproduction. (Relative to which, I've heard that would-be goat hunters are already complaining that there are "no goats" on Flower Mountain up in the Haines pass- this is frequently used by heliskiers). There's a chemical pathway by which the reproductive loss occurs: All the different aspects of the reproductive system have their own hormones (estrogen, pregestrone, and prolactin) but there's one overriding hormone, cortisone, which runs the whole show. In a fear type situation, cortisone is released, floods the brain and suppresses the other hormones. Pregnancy can't take much of this; it needs its hormones to carry on. One severe stress might be enough to terminate it, or several repeated, or perhaps a combination.</p> <p>Effects of stress are the same for all mammals.</p>	Thank you, comment acknowledged.
43 - 10	<p>Fish and Game asked that the mountain goat populations in the Chilkoot/Ferreebee ranges be protected from heliskiing in order to use them as a control group to compare with other local populations that do have heliskiing.</p>	Thank you, comment acknowledged.
43 - 16	<p>The entire area is essential habitat for brown bears, with sows and cubs using the lower river more in the summer, and others using the lake and spawning streams that run into it.</p>	Thank you, comment acknowledged.
45 - 6	<p>Scientific studies and personal experiences show that snowmachines, helicopters and personal watercraft have harassed, stressed, displaced, and otherwise negatively affected wildlife. Mountain goats are a particular species that are known to be sensitive to helicopters. Evidence has been gathered that shows that the extensive helicopter activity in Skagway is not adequately mitigated, monitored or controlled to the detriment of wildlife.</p>	Please see response to comment 22-12 under Enforcement and Monitoring.

Wildlife

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
45 - 7	Across the canal in Haines is the heaviest concentration of mountain goats on BLM managed lands in North America and fewer helicopter activities. This is a not-to-be-missed opportunity to study and protect the mountain goat population on BLM lands with a special use designation that would prohibit heli-playing and other invasive activities.	Please see response to comment 34-11 under DOI/BLM Compliance.
45 - 8	As recently as 2002, BLM and USFS, in their joint request to the National Fish and Wildlife Foundation for a grant to study helicopter effects on wildlife, indicated that they did not have comprehensive, scientific guidelines to successfully protect wildlife populations including goats, from helicopter impacts.	Thank you, comment acknowledged.
68 - 2	We also want BLM to protect mountain goats, other wildlife and wilderness values in Haines.	Please see response to comment 34-11 under DOI/BLM Compliance.
71 - 2	I feel the RMP accurately assesses Haines' outstanding mountain goat resources. These resources need to be protected by an appropriate management designation.	Please see response to comment 34-11 under DOI/BLM Compliance.
71 - 4	The RMP puts the existing Goat Monitoring and Control Area into a SRMA with a mandate to meet public demand for helicopter recreation. This designation conflicts with a control area intended to protect goats from helicopter recreation and should be changed to a ACEC/RNA designation. The BLM should analyze the ten years of goat monitoring data they have before issuing any new helicopter landing permits and before designating a large area in goat habitat for helicopter-based recreation, which the SRMA would allow to happen.	Please see responses to comments 34-11 and 34-27 under DOI/BLM Compliance.

Wildlife

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
84 - 3	The goat research by BLM Biologist, Jeff Denton now includes 10 years of data in the Haines area. The BLM would be remiss in considering any new helicopter use permits without first analyzing this important data-base, and the outcome of that analysis certainly will bring new information to bare on how the BLM should best manage its lands for future generations.	Please see response to comment 34-11 under DOI/BLM Compliance.
87 - 6	Waterfowl are being disturbed and destroyed (by our own and our neighbors' observation) continuously because of ORV, airboat, shooting and fireworks activity. Poaching of wildlife is excessive. Ravens are targets for shooters.	Please see responses to comments 4-2 under Off-Highway Vehicles and 22-12 under Enforcement and Monitoring.
112 - 6	In section 1.3.1 the draft states "...degradation of natural resources has occurred, including impacts to habitat for runs of red and silver salmon and for waterfowl." We're concerned with the implication that the fish and wildlife in this area are negatively impacted in a significant way. According to the State Department of Fish and Game who actively manages fish and game including salmon, waterfowl and large game, they have not determined a significant impact and have written documentation to that effect. In fact, salmon fishing and waterfowl hunting is widely considered to be healthy in the area. We're requesting that the draft include some language that require objective and professional analysis such as by the Alaska Department of Fish and Game for determining any detrimental impact to those natural resources. Also that any limitation imposed to protect natural resources be only as a result of significant declining population numbers as documented by state or federally funded biologists assigned to the area.	The cited comment is a summary of the issue as identified by the public and internal scoping process. It is not an evaluation of the scope, scale, or severity of the perceived impact. The Proposed RMP/Final EIS does include language explaining the incorporation of fish and wildlife data from the Alaska Department of Fish & Game. In 1983, a Master Memorandum of Understanding (MOU) BLM and ADF&G agreed to recognize their respective roles in managing fish and wildlife resources and their habitat. According to the MOU, BLM agreed to recognize ADF&G as the primary agency responsible for management of use and conservation of fish and wildlife resources on federal lands (see 1.5.2 of the Proposed RMP/Final EIS). As a multiple use and management agency, BLM cannot state that the only limitations imposed to protect natural resources will be the result of documented population declines, as a preemptive management might be appropriate to a particular situation.
112 - 8	Regarding the Neacola, Haines and Skagway areas and potential limitations to helicopter and other backcountry means of access, we are fundamentally opposed to restrictions that may not be based totally on fact. We understand limitations where fish and game species in a given area are proven to be negatively impacted in a measurable and significant way. However, when allegations of long-term impact to species such as goats have not been proven, we oppose restrictions to alleviate or study alleged impact. We do feel that allegations must be supported by objective analysis from state or federally funded wildlife biologists before imposing any restrictions.	Please see response to comment 29-9 under Wildlife.

Wildlife

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 56	<p>The major Haines Block planning issue is the impact of helicopter-supported recreation on goats and other wildlife, according to the Draft RMP/EIS. Thus, it is essential that BLM analyze the ten years of goat monitoring data gathered from the Haines Block prior to making land use planning decisions that may negatively affect an important wildlife resource. Wildlife specialists recognize that increasing levels of helicopter-supported recreation in goat habitat "can result in a variety of negative effects, including habitat abandonment significant enough to affect population status and herd viability, dramatic changes in seasonal habitat use, increased vulnerability to predation, alarm response, decreased bouts of foraging and resting, increased animal movement and energy expenditure, and reduced productivity." See 2004 Northern Wild Sheep and Goat Council Position Statement. This statement from a professional organization of wildlife biologists, researchers and veterinarians is based on "the best available knowledge. See id. It differs dramatically from the conclusion in the Draft RMP/EIS that managing the Haines Block for heli-supported recreation in a SRMA would have "continued minimal adverse effects from recreation activities." See Draft RMP/EIS at 4-148.</p>	<p>Please see responses to comments 34-10 and 34-27 under DOI/BLM Compliance.</p>
119 - 57	<p>"A successful land use planning effort always employs rigorous standards for maintaining, managing, and applying data and derived information." LUP Handbook Appendix G at 1. "Standardized, accurate, and reliable data and information are critical to the development of plan assessments, alternatives, impact analysis, and planning decisions." Id. We believe that BLM should analyze its ten years of goat monitoring data and include it in a supplemental Draft RMP/EIS as the basis for a range of alternatives that address Haines Block planning issues. This data would not only supply information about the current condition of goat populations, it could be used to predict changes in goat and goat predator resources should the current management continue, as required by the LUP Handbook. See LUP Handbook Appendix F at 8.</p>	<p>BLM agrees with the stated comments. The mountain goat inventory data is being analyzed along with other available information and will be utilized in the preparation of the Haines Block SRMA implementation-level plan. When compiled and analyzed, the assessment will be made available as a published report.</p>

End of section on Wildlife

Wilderness

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 142	<p>In none of the alternatives did BLM specifically identify areas within the Ring of Fire planning area for consideration as Wilderness or Wilderness Study Areas (WSA). This is in contravention of BLM's organic statute, the Federal Lands Management Act (FLPMA). Pursuant to FLPMA, BLM must "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern" 43 USC 1711(a)).</p> <p>Once completed, these inventories become a key criterion in the development of RMPs. 43 USC 1712 (c)(4). As stated in the Alaska Coalition's scoping comments of August 2004, BLM should consider the future designation of wilderness in this planning process and is required to complete resource inventories and land use plans under the authority. See FLMPA §§201-202. FLPMA defines wilderness as a multiple use. 43 U.S.C. §§ 1701(a)(8), 1702(c)).</p> <p>NEPA requires BLM to inventory all resource values, including the impacts to those values in land use plans, and the creation of wilderness is a reasonable alternative. The identification of lands potentially suitable for WSA designation is further clarified in BLM's Wilderness Inventory and Study Procedures Handbook, as follows: Wilderness Inventory. BLM will prepare and maintain on a continuing basis an inventory of certain public lands to determine the presence or absence of wilderness characteristics.</p> <p>Identifying Inventory Areas. BLM will identify those public lands to be inventoried and notify the public of its intent to initiate an inventory to determine the presence or absence of wilderness characteristics.</p> <p>Identifying WSAs. BLM will use the land use planning process to determine which inventory areas are to be managed as WSAs.</p> <p>The Handbook also contains criteria for areas to be considered for WSA designation.</p>	BLM has not analyzed wilderness designations in the PRMP/FEIS for the reasons stated in Sections 1.1 and 1.3.2.

Wilderness

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 143	<p>We understand that BLM conducted an inventory process for the Ring of Fire planning area and that it presently may be incomplete. However, the Recreation Opportunity Spectrum (ROS), while an important aspect of the land use planning process, does not take the place of a Wilderness Inventory. The ROS inventory should be completed and should include a thorough wilderness review and inventory of the Ring of Fire planning area for submission to Congress. We strongly urge BLM to recognize wilderness as a resource category.</p> <p>ANILCA § 1320 also provides guidance for BLM's management of wilderness as a resource. It is imperative at this point in the planning process for BLM to ascertain the resource values on the public lands along the southern coast of Alaska, and one of those resources must include wilderness quality. We support the use of the ROS and designation of qualified areas as "primitive." However, this should substitute for a wilderness inventory, recommendation, and as appropriate, designation.</p>	<p>We understand your comment to mean that this should NOT substitute for a wilderness designation. BLM has not analyzed wilderness designations in the PRMP/FEIS for the reasons stated in Sections 1.1 and 1.3.2.</p>
119 - 145	<p>Should BLM continue the public process without including a wilderness inventory and recommendations, it would be in violation of law. For the reasons discussed above, NEPA and FLPMA require BLM to consider potential wilderness as a reasonable alternative for any resource management plan in Alaska. For this reason, the Draft RMP/EIS must include a reasonable range of alternatives that include recommendations for new wilderness designations.</p>	<p>BLM disagrees. NEPA says nothing about wilderness inventory or consideration in Alaska. FLPMA, Section 603 (43 U.S.C. 1782) directs the Secretary to review roadless areas for wilderness characteristics. However, 43 USC 1784 specifically exempts Alaska from this consideration. However, it does state that "the Secretary may identify areas in Alaska which he determines are suitable as wilderness and may, from time to time, make recommendations to the Congress for inclusion of any such areas in the National Wilderness Preservation System..." This is a discretionary action on the part of the Secretary. By Memorandum April 11, 2003, the Secretary directed BLM not to consider wilderness in its RMPs absent the broad support of the elected officials representing Alaska.</p>

End of section on Wilderness

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
13 - 6	The Iniskin River is another that was in the planning area, has absolutely remarkable brown bear habitat. Anytime flying over this river it is incredible. These resources do not exist anywhere else within the planning area on BLM lands. So we ask that the Iniskin River bear habitat is protected as long as BLM is the interim manager of that area.	BLM will retain a very small part, if any, of the Iniskin River in the long-term. Future actions are subject to the application of the ROPs and stipulations as appropriate, and will go through the NEPA process which may develop mitigation measures related to the potential impacts of the activity being considered.
16 - 9	Tsirku River and Chilkoot River need to be evaluated for wild status. Their value as anadromous streams could benefit from protection under "wild" status.	Thank you, comment acknowledged.
16 - 10	Chilkat River could receive different levels of protection; Chilkat River above Wells Bridge would qualify as a wild river. Below Wells Bridge it would qualify for differing degrees of protection. BLM should evaluate how management of the Chilkat River under Wild & Scenic protection would interface with management of the river as Chilkat Bald Eagle Preserve. The most protective status should be adopted.	Thank you, comment acknowledged. A Recordable Disclaimer of Interest application for the Chilkat River was filed on May 13, 2004 and subsequently amended on June 8, 2005. Even though the application is currently under review, it is predictable that eventually the title to this water body will no longer vest with BLM.
88 - 5	As well, I fully support the Wild and Scenic River designations of the following rivers; Chilkoot River, Ferebee River, Takhin River, Tsirku River and Chilkat River.	Thank you, comment acknowledged.
89 - 7	In addition I fully support the Wild and Scenic River designation of the Chilkoot River (both upper and lower), Ferebee River, Takhin River, Tsirku River and Chilkat River.	Thank you, comment acknowledged.
90 - 4	Additionally, I fully support the Wild and Scenic River designations of the following rivers; Chilkoot River, Ferebee River, Takhin River, Tsirku River and Chilkat River.	Thank you, comment acknowledged. The Chilkoot, Tsirku, and Chilkat Rivers were determined eligible in the Draft RMP/EIS, but not suitable for WSR designation under Alternative C in the PRMP/FEIS. Please see section 3.4.1.3 in the PRMP/FEIS for a discussion of the WSR suitability determination.

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
110 - 3	We are concerned at the lack of designated Wild and Scenic Rivers and the lack of protection for the staircase area above Lake George.	Thank you, comment acknowledged.
113 - 3	We appreciate the effort BLM has undertaken around the country to inventory and protect the nation's last remaining wild and scenic rivers. Unfortunately, the DRMP/EIS in its present form inadequately addresses potential wild and scenic rivers and fails to fulfill the BLM's obligations under NEPA, the Wild and Scenic Rivers Act and the BLM's own management guidelines.	The basis for BLM's determination for WSR eligibility and suitability was adequately disclosed in the Draft RMP/EIS. Clarifications have been made in the PRMP/FEIS in Section 3.4.1.3 to assist with the public review of this process.
113 - 5	The public deserves to have access to the full wild and scenic eligibility analysis and an opportunity to review and comment on this information before a Final RMP/EIS is issued.	See response to comment 113-3 under Wild and Scenic Rivers.
113 - 6	Inadequate documentation and discussion of eligible Wild and Scenic River Overall, American Rivers is disappointed by the slim analysis of eligible wild and scenic rivers and the lack of enumerated protections for identified Outstandingly Remarkable Values in the Ring of Fire DRMP/EIS.	Please see response to comment 113-3 under Wild and Scenic Rivers.

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
113 - 7	<p>To be eligible for inclusion in the National Wild and Scenic River System, a river or segment thereof must be "free-flowing" and it or its related land area must possess at least one "Outstandingly Remarkable Value" (ORV). 16 U.S.C. § 1273 (b). Those are the sole criteria listed by Congress. Under these fairly objective evaluation criteria, a river or segment of river either is or is not eligible and the determination of eligibility should remain constant across all alternatives. Yet, in the DRMP, only a cursory mention is made of 14 eligible river segments that would be recommended for Wild and Scenic designation under Alternative C; under all other Alternatives, including the Preferred Alternative, no river segments would be recommended for Wild and Scenic designation. This approach is inadequate on many levels.</p> <p>First, as mentioned above, a river segment either is or is not Wild and Scenic eligible. If it is determined to be eligible under a 5(d)(1) study process, its eligibility should be noted across all alternatives, since this is an unchanging fact.</p>	<p>Eligibility is only part of the planning process for WSR designation. The alternatives portray a range of possible recommendations for designation. For a discussion, please see Section 2.3.9.</p>
113 - 8	<p>Second, as the rivers have been determined eligible, all Alternatives should discuss management actions that will be taken, if only in the interim, to protect the identified ORVs. The BLM Manual repeatedly emphasizes that all river segments identified as eligible at the outset of the planning process must be managed to protect their free-flowing characteristics and ORVs from any changes that would affect the rivers' eligibility or tentative classification. These interim protective measures must remain in place until final suitability decisions are made at the end of the RMP planning process, or until a final designation decision is made by Congress. See BLM Manual 8351 § .06(D), at 10; § .32, at 18-19; § .33, at 20, 23; § .52(C), at 34. The interim protective measures being implemented by BLM "shall be included in the RMP." Id. § .52(C) at 34. and BLM is required to provide public notification of its protective management measures "no later than public release of the draft RMP." Id. at § .32(C) at 19.</p> <p>The Draft RMP/EIS fails to comply with these requirements in several respects. First, it fails to set forth BLM's commitment to protecting all eligible rivers throughout the planning process. Second, it fails to include any discussion of the protection measures that will be used to safeguard the eligibility and tentative classification of all eligible rivers until a final suitability or designation decision is made. Third, there has been no 'public notification' regarding BLM's protective management of all eligible rivers in the Draft RMP/EIS or in any separate public notice document. Along with the Alaska Coalition, we request that BLM issue a Revised Draft RMP/EIS that complies with these requirements.</p>	<p>BLM was responsible for interim management of the ORVs of the proposed eligible WSR segments between the Draft RMP/EIS and the PRMP/FEIS. During this interim period, BLM monitored proposals for activities that might have impacted the ORVs. No actions were proposed or approved that would have impacted the potential suitability of any river segment analyzed.</p> <p>Please also see responses to comments 113-3 and 113-20 under Wild and Scenic Rivers.</p>

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
113 - 9	<p>An additional reason to issue a Revised Draft RMP/EIS lies with the inadequate documentation of the process arriving at an eligibility determination and the ORVs for each river segment determined eligible for Wild and Scenic designation. The Interagency Guidelines governing river designation under the WSRA provide that, “[w]hile only one outstandingly remarkable value is necessary for eligibility, the study report should carefully document all values of the river area.” In the Draft RMP/EIS, BLM provided a brief summary of its process describing eligibility and suitability in general. This short summary is not a ‘careful documentation’ of the outstandingly remarkable values (ORVs) for each river. BLM’s failure to include this documentation violates its mandate under the WSRA and NEPA. The statute requires BLM to provide a detailed description of the specific ORVs for each eligible river. Each “river study report will be a concise presentation of the information required in sections 4 (a) and 5 (c) of the Act as augmented by the Council on Environmental Quality regulations implementing the procedural provisions of the [NEPA].” 47 Fed. Reg. 39456. Without this information, the public cannot engage in informed decisionmaking.</p>	Please see response to comment 113-3 under Wild and Scenic Rivers.
113 - 10	<p>A Revised Draft RMP/EIS must “carefully document” and describe the unique and outstanding values of each eligible river. For instance, for rivers with ORVs based on the presence of fish and/or wildlife, the Draft RMP/EIS should, at a minimum, identify what fish and/or wildlife species are found within the river corridor and explain why they are outstandingly remarkable. Bare references to these values – e.g., “Scenic and recreational values” – are inadequate.</p>	Please see response to comment 113-3 under Wild and Scenic Rivers.
113 - 11	<p>Furthermore, as touched on above, the BLM should clearly and specifically provide for the protection of identified ORVs through management actions as part of the DRMP.</p>	Please see responses to comments 113-3 and 113-20 under Wild and Scenic Rivers.

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
113 - 20	<p>BLM cannot base its decision to find a river ineligible for consideration on the fact that a portion of the river segment or the adjacent uplands are already owned by the State of Alaska, Native entities, or private landowners. By definition, the only eligible river segments under consideration in this RMP planning process are those that are at least partially on BLM-administered lands. If partial non-federal ownership is the basis for a non-suitability determination, BLM must provide a detailed explanation of how such ownership and jurisdictional issues would interfere with management to protect the river's ORVs.</p> <p>Similarly, it is not sufficient for BLM to rely on the State-selected, Native-selected, or Dual-selected status of rivers in making its proposed non-suitability determinations without providing any discussion of how these potential ownership and jurisdictional issues would interfere with management to protect the rivers' ORVs. The BLM Manual clearly contemplates that there will be some river segments within the NWSRS that are not federally managed or that are only partially federally managed.</p>	Please refer to Section 3.4.1.3 of the PRMP/FEIS for an explanation of the suitability determination.
113 - 21	<p>Finally, the Draft RMP/EIS failed to analyze the direct, indirect, and cumulative impacts of recommending rivers as suitable or un-suitable for designation, as required by NEPA. We request that BLM amend the Draft Plan to include an analysis of the specific impacts of designation or non-designation of each eligible river segment upon recreation opportunities, fisheries, wildlife, historic and cultural values, local economies, subsistence, scientific and educational opportunities, and all other significant impacts.</p>	<p>As per BLM planning guidelines, the Draft RMP/EIS identified 14 river segments that were eligible for WSR designation, and were evaluated for suitability in the PRMP/FEIS, incorporating comments received on the Draft RMP/EIS. Based on suitability criteria discussed in Chapter 3, none of these rivers were determined to be suitable for WSR designation. However, ORVs that were identified in the eligibility process will be taken into account for protection when evaluating permits for future proposed activities.</p>
113 - 22	<p>BLM Should Defer the Final RMP Suitability Decision</p> <p>In addition to the normal delay of suitability until the end of the RMP process, American Rivers also asks that the BLM use this RMP public process to collect information and conduct a preliminary suitability analysis, yet defer the final suitability decisions until after State and Native conveyances are completed. There is substantial uncertainty regarding which river areas will remain in federal ownership and which will be conveyed to the State and/or Native entities, due to over-selections and constantly changing State priorities. By making final non-suitability decisions in the face of such uncertainty, an eligible river's values would be permanently removed from the possibility of protection under the WSRA. Therefore, we submit that it is premature and inappropriate to make final suitability decisions and recommendations within this RMP.</p>	<p>Please see response to comment 113-20 under Wild and Scenic Rivers.</p>

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
113 - 23	<p>Additionally, we request that the BLM commit in the Final RMP/EIS to conduct a future suitability re-analysis for all eligible rivers that are retained under permanent BLM management. At that time, BLM should make the appropriate recommendations to Congress for inclusion in the national system or apply administrative measures to appropriately manage and enhance the outstandingly remarkable river-related values that have been inventoried and presented with this draft plan.</p>	Please see response to comment 113-20 under Wild and Scenic Rivers.
114 - 3	<p>Further, I would like to see the Chilkoot and Tsirku rivers designated as Wild and Scenic Rivers. Both rivers (particularly the Chilkoot) are under the onslaught of increased commercial tourism. Local officials lack either the will or the management authority to control this activity. Designation as a Wild and Scenic River could help provide a management framework. And, of course, both rivers truly are wild and scenic.</p>	Thank you, comment acknowledged.
119 - 18	<p>Thus, we strongly believe that BLM is now responsible for conservatively managing the recognized scenic and wildlife ORVs of the Chilligan River, regardless of whether the river is declared suitable for congressional designation into the National Wild & Scenic River System. Assignment of an appropriate alternative administrative designation, such as inclusion within the Neacola Mountains ACEC or as an Outstanding Natural Area (ONA), would help to ensure protective management of the Chilligan River's identified ORVs.</p>	Please see responses to comments 113-13 under Special Management Areas, and 113-3 and 113-20 under Wild and Scenic Rivers.

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 25	<p>The Interagency Guidelines governing river designation under the WSRA provide that, “[w]hile only one outstandingly remarkable value is necessary for eligibility, the study report should carefully document all values of the river area.” In the Draft RMP/EIS, BLM provided a brief summary of its process for determining whether to classify a river as Wild and Scenic pursuant to the WSRA. See Draft RMP/EIS at 2-32. However, a description of BLM’s process describing eligibility and suitability in general are not adequate to constitute a ‘careful documentation’ of the ORVs for each river.</p> <p>BLM’s failure to include this documentation violates its mandate under the WSRA. The statute requires BLM to provide a detailed description of the specific ORVs for each eligible river. BLM’s failure to do so hinders informed decision-making and deprives the public of an opportunity to provide meaningful feedback.</p> <p>The Draft RMP/EIS must “carefully document” and describe the unique and outstanding values of each eligible river. For instance, for rivers with ORVs based on the presence of fish and/or wildlife, the Draft RMP/EIS should, at a minimum, identify what fish and/or wildlife species are found within the river corridor and explain why they are outstandingly remarkable. Similarly, for rivers with ORVs based on scenic, historic, cultural, and recreational values, the Draft RMP/EIS should, at the very least, include a description of the nature, type, and extent of the scenic, historic, cultural, and/or recreational values found within the river corridor, as well as a discussion of why they are outstandingly remarkable. Bare references to these values, e.g., “Scenic and recreational values,” are inadequate.</p>	<p>The referenced discussion from the Interagency Guidelines refers to reports required for rivers listed in Section 5A of the WSRA, and is inapplicable to the rivers under discussion in this PRMP/FEIS. Please see Section 3.4.1.3 for further information on the eligibility determination process.</p>

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 26	<p>The BLM Manual repeatedly emphasizes that all river segments identified as eligible at the outset of the planning process must be managed to protect their free-flowing characteristics and ORVs from any changes that would affect the rivers' eligibility or tentative classification. These interim protective measures must remain in place until final suitability decisions are made at the end of the RMP planning process, or until a final designation decision is made by Congress. See BLM Manual 8351 § .06(D) at 10; § .32 at 18-19; § .33 at 20, 23; § .52(C) at 34. The interim protective measures BLM is implementing "shall be included in the RMP." Id. § .52(C) at 34. BLM is required to notify the public of its protective management measures "no later than public release of the Draft RMP." Id. at § .32(C) at 19.</p> <p>The Draft RMP/EIS fails to comply with these requirements in several respects. First, it fails to set forth BLM's commitment to protecting all eligible rivers throughout the planning process. Second, lacks any discussion of the protection measures that will be used to safeguard the eligibility and tentative classification of all eligible rivers until a final suitability or designation decision is made. Third, in the Draft RMP/EIS BLM has not notified the public of its protective management of all eligible rivers nor given such public notice separately. We request that BLM issue a Revised Draft RMP/EIS that complies with these requirements.</p>	Please see responses to comments 113-3 and 113-20 under Wild and Scenic Rivers.
119 - 27	<p>BLM Manual 8351 provides that, "all eligible river segments shall be evaluated for suitability or non-suitability using the BLM RMP process." BLM Manual 8351 § .33(A) at 20 (emphasis added). Moreover, the planning records and documents BLM prepared during the RMP process "must carefully describe all analyses and determinations made pursuant to this Manual," and a "narrative and rationale must be a part of the planning record and included as part of the RMP/EIS."</p> <p>Here, BLM failed to identify the number of rivers that were inventoried and reviewed for eligibility. It also failed to explicate its reasons for recommending 14 rivers for classification as wild and scenic in Alternative C. The Draft RMP/EIS lacked any discussion of the values that qualified these rivers for recommended classification in Alternative C or the reasons any others were disqualified. BLM Manual 8351 instructs BLM that "[a]t least one alternative shall provide for designation of all eligible river segments (under assessment in the RMP/EIS) in accordance with their tentative classifications."</p>	Additional information regarding the WSR analysis process is provided in Section 3.4.1.3.

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 29	For the three alternatives that fail to recommend the designation of a single eligible river, we urge BLM to analyze and present options for providing alternative potential means for protecting the ORVs of non-suitable rivers, including, but not limited to, land use designations such as ACECs, RNAs, ONAs, and SRMAs.	Please see responses to comments 113-3, 113-20, and 113-21 under Wild and Scenic Rivers.
119 - 31	We also request an opportunity to review and offer comments on any suitability analysis that may be in the record in which all thirteen factors were considered, including all materials that support that analysis, particularly public comments.	See responses to comments 113-3 and 113-20 in Wild and Scenic Rivers.
119 - 32	BLM cannot designate a river as ineligible for consideration on the basis that a portion of the river segment or the adjacent uplands are already owned by the State of Alaska, Native entities, or private landowners. By definition, the only eligible river segments under consideration in this RMP planning process are those that are at least partially on BLM-administered lands. If partial non-federal ownership is the basis for a non-suitability determination, BLM must provide a detailed explanation of how such ownership and jurisdictional issues would interfere with management to protect the ORVs of each river. Similarly, it is not sufficient for BLM to rely on the State-selected, Native-selected, or dual-selected status of rivers in making its proposed non-suitability determinations without including in the RMP any discussion of how these potential ownership and jurisdictional issues would interfere with management to protect the rivers' ORVs. The BLM Manual clearly contemplates that there will be some river segments within the National Wild and Scenic River System that are not federally managed or that are only partially federally managed.	Please see response to comment 113-20 under Wild and Scenic Rivers, and Section 3.4.1.3 in the PRMP/FEIS.

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 34	<p>There is substantial uncertainty regarding which river areas will remain in Federal ownership and which will be conveyed to the State and/or Native entities due to over-selections and constantly changing State priorities. By making final non-suitability decisions in the face of such uncertainty, an eligible river's values would be permanently removed from the possibility of protection under the WSRA. Therefore, we submit that it is premature and inappropriate to make final suitability decisions and recommendations within this RMP.</p> <p>We recommend that BLM use this RMP public process to collect information and conduct a preliminary suitability analysis, yet defer the final suitability decisions until after State and Native conveyances are completed. Only at that time will the ownership status of the eligible rivers be fully known and the corresponding management challenges, if any, best understood. If eligible river values are managed in accordance with their tentative classifications, as required under BLM Manual 8351, the river status and eligibility will not be diminished in the interim.</p> <p>Additionally, we request that the BLM commit in the Final RMP/EIS to conduct a future suitability re-analysis for all eligible rivers that are retained under permanent BLM management. At that time, BLM should make the appropriate recommendations to Congress for inclusion in the national system or apply administrative measures to appropriately manage and enhance the ORVs that have been inventoried and presented with this draft plan.</p>	Please see response to comment 113-20 under Wild and Scenic Rivers.

Wild and Scenic Rivers

<i>Comment #</i>	<i>Comment</i>	<i>Response</i>
119 - 35	<p>We are disappointed that the Draft RMP/EIS did not acknowledge our 2004 scoping nomination for special protection for the wildlife habitat and brown bear populations along the BLM-managed portions of the Iniskin River. BLM declares in the draft plan that the Iniskin River qualifies as "eligible" for designation as a National Wild & Scenic River, however no protection is allocated for the river's ORVs. In the above cited email authored by Mr. Lloyd, BLM identified wildlife values (specifically the brown bears), recreation values (bear viewing and hunting), and "ecological function" as the river's "outstandingly remarkable values." We again remind BLM that only one ORV need exist to qualify a river as "eligible" for national designation and protection.</p> <p>According to BLM Manual 8351, all river segments identified as "eligible" for the National Wild & Scenic River System must be managed to protect their free-flowing characteristics and ORVs from any changes that would affect the rivers' eligibility or tentative classification. These interim protective measures must remain in place until final suitability decisions are made at the end of the RMP planning process, or until Congress makes a final designation decision. Therefore, we understand that BLM must protect the free-flowing nature and outstanding wildlife (brown bear) resources of the "eligible" Iniskin River lands. In the Draft RMP/EIS, BLM fails to make such a commitment to protect the Iniskin River's ORVs.</p>	<p>BLM was responsible for interim management of the ORVs of the proposed eligible WSR segments between the Draft RMP/EIS and the PRMP/FEIS. During this interim period, BLM monitored proposals for activities that might have impacted the ORVs. No actions were proposed or approved that would have impacted the potential suitability of any river segment analyzed.</p> <p>Please also see responses to comments 113-3 and 113-20 under Wild and Scenic Rivers. The section dealing with Alternatives Considered but not Analyzed Further, (Section 2.2 in the Proposed RMP/Final EIS) consolidated nominations for Special Management Areas, including Wild and Scenic Rivers.</p>

End of section on Wild and Scenic Rivers

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ATTACHMENT D

SUBMISSION INDEX

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
1	Dubber, Leonard	Haines, AK	
2	Woods, Jean	Palmer, AK	Matanuska Valley Sportsman
3	Coutts, Dick	Palmer, AK	Butte Community Council
4	Quaas, Agnes	Palmer, AK	
5	Quaas, Marty	Palmer, AK	
6	Buzby, Stacey	Palmer, AK	
7	James, Rachel	Anchorage, AK	Alaska Coalition
8	Fritz, Cecily	Palmer, AK	Knik River Watershed Group
9	Bingham, Carl	Palmer, AK	
11	Taygan, Will	Anchorage, AK	Knik Group, Alaska Chapter Sierra Club
12	Uhde, Eric	Anchorage, AK	Alaska Center for the Environment
13	Blair, Melissa	Anchorage, AK	Alaska Coalition
14	Clark, Todd	Anchorage, AK	Alaska Outdoor Access Alliance
15	Weishahn, Carolyn	Haines, AK	
16	Holle, Eric	Haines, AK	
17	Herminghaus, Trisha	Anchorage, AK	Alaska Quiet Rights Coalition
18	Robinson, James	Phoenix, OR	
	Robinson, Elizabeth	Phoenix, OR	
19	Alderson, Frances	Baltimore, MD	
	Alderson, George	Baltimore, MD	
20	Metz, Michele	Juneau, AK	Sealaska Corporation
21	Taylor, George		
22	Howard, Robert	Palmer, AK	
23	Wells, Kathy	Palmer, AK	Friends of Mat-Su
24	Jones, Sev	Palmer, AK	Matanuska-Susitna Borough
25	Barber, Kenny	Palmer, AK	
26	Scott, Stephanie K.	Haines, AK	Haines Borough Assembly

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
27	Heughins, Russ Kanrud, Hal Case, Patrick Higdon, Charles DuBord, Jason Slapcinsky, Jodi Estlow, Ed Hesla, Chris Meyer, George Lively, John Zielinski, Ken Robertson, Preston Hovorka, Duane Trimberger, John McGlenn, John Riffle, Lew		Idaho Wildlife Federation Stutsman County (ND) Wildlife Federation Golden State (CA) Flycasters California Division - Izaak Walton League North Dakota Wildlife Federation North Florida Fly Fishers Minnesota Fly Fishers South Dakota Wildlife Federation Wisconsin Wildlife Federation Twin Tiers Five Rivers Fly Fishers (NY) Milwaukee Lake & Stream Fly Fishers (WI) Florida Wildlife Federation Nebraska Wildlife Federation Michigan Division - Izaak Walton League Washington Wildlife Federation Santa Barbara Flyfishers
28	Abshire, Kristine A.	Wasilla, AK	Alaskans for Palmer Hay Flats SGR
29	Clark, Todd	Anchorage, AK	Alaska Outdoor Access Alliance
30	Clark, Vicki	Anchorage, AK	Trustees for Alaska
31	Drehn, Darryl Erickson, Jeanine Frey, Lucille J. Coutts, Dick	Palmer, AK	Butte Community Council Butte Community Council Butte Community Council Butte Community Council
32	Quaas, Marty Quaas, Agnes	Palmer, AK Palmer, AK	
33	Fries, Carol	Anchorage, AK	Alaska Department of Natural Resources
34	Berland, Nancy	Haines, AK	Lynn Canal Conservation, Inc.
35	Wade, Doug	Chickaloon, AK	NAV DINI AA NA (CHICKALOON VILLAGE)
36	Banks, David	Anchorage, AK	The Nature Conservancy
37	Woods, Jean	Palmer, AK	
38	Davis, Howard T.	Clam Gulch, AK	
39	Byrnes, James M.	Eagle River, AK	
40	Dadourian, Laurie	Haines, AK	
41	Borell, Steven C.	Anchorage, AK	Alaska Miners Association, Inc.
42	Reichgott, Christine B.	Seattle, WA	Environmental Protection Agency
43	McGuire, Sally	Haines, AK	
45	Hatton, Elizabeth	Anchorage, AK	Alaska Quiet Rights Coalition
46	Hansen, Michael	Chugiak, AK	
47	Fritz, Cecily	Palmer, AK	Knik River Watershed Group

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
48	Arnesen, Jim	Eagle River, AK	Eklutna, Inc.
49	Wilson, Jennifer	Anchorage, AK	Department of Transportation & Public Facilities
50	Woods, Noel W.	Palmer, AK	Matanuska Valley Sportsman
51	Larson, June	York, SC	Pug Lovers Rescue
52	Wood, Margaret	Suffolk, VA	
53	Brogan, Loretta	Shreveport, LA	
54	Taygan, Will	Anchorage, AK	Knik Group, Alaska Chapter Sierra Club
55	Weishahn, Carolyn	Haines, AK	
56	Kolehmainen, Karol		
57	Sachau, B.	Florham Park, NJ	
58	Harlib, Amy	New York, NY	
59	Fritz, Cecily	Palmer, AK	Knik River Watershed Group
60	Denison, James	Long Beach, CA	
61	Gille, Greg	Bellevue, WA	
62	Culbeck, Darsie	Haines, AK	Alaska Mountain Guides
63	Cone, Frances	Pawleys Island, SC	
64	Huggins, William	Las Vegas, NV	
65	Griffin, Dorothy	Albany, GA	
66	Gage, Cathy	Guelph, ON	
67	Lancaster, Emily	Guelph, ON	
68	Nelson, Hazel	Haines, AK	
	Nelson, Ardis	Haines, AK	
	Piper, Nancy	Haines, AK	
	Nelson, Irene	Juneau, AK	
	Nelson, Paul	Haines, AK	
69	Justice, Stan	Fairbanks, AK	
70	Dixon, Jerry S.		
71	McDonough, Tim	Haines, AK	
72	Crane, Steve	Soldotna, AK	
73	Bragg, Dawn		Alaskans for Palmer Hay Flats SGR
74	Vogt, Deborah	Haines, AK	Haines Borough Assembly
75	Lushear, Carol	Dunedin, FL	
76	Fine, Doug		
77	Brown, Carle L.	Portsmouth, NH	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
78	Flowers, Chris	Anchorage, AK	
79	Prang, Tom		
80	Sundberg, Scott		Southeast Alaska Backcountry Adventures
81	Libenson, Sue	Haines, AK	Alaska Coalition
82	Olson, Drake		ECA, Inc.
83	Wacker, William	Haines, AK	
84	Sheldon, Burl	Haines, AK	
85	Olsen, Susan	Anchorage, AK	Alaska Resource Advisory Council
86	Triplett, Tia	Los Angeles, CA	
87	Lively, Brigitte	Palmer, AK	
88	Crupi, Lori	Haines, AK	Haines Borough Assembly
89	Crupi, Anthony	Haines, AK	
90	Crupi, Elias	Haines, AK	
91	Meacham, Thomas E.	Anchorage, AK	
92	Smith, Norman L.	Haines, AK	
93	Dugan, Robert G.	Girdwood, AK	
94	Dixon, Jerry S.		
95	Thurmond, Roberta	Hixson, TN	
96	McGinness, Doris	Des Plaines, IL	
97	Chasse, Joe	Ocean Park, WA	
98	Deatherage, Karen James, Rachel Virgin, Randy Huffines, Eleanor Toppenberg, John Carey, Scott Kirsch, Katya Forman, Paul		Defenders of Wildlife Alaska Coalition Alaska Center for the Environment The Wilderness Society Alaska Wildlife Alliance Lynn Canal Conservation Southeast Alaska Conservation Council Sierra Club - Alaska Chapter
99	Kittleson, Marcia	Springfield, MO	
100	Cone, Frances	Pawleys Island, SC	
101	Gregory, Branwen	Los Angeles, CA	
102	McCleary, Harriet	Minneapolis, MN	
103	Cummings, Terry	Anchorage, AK	
104	Gille, Greg	Bellevue, WA	
105	Lancaster, Emily	Guelph, ON	

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<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
106	Jonas, Mark		
107	Leach, Tim	Palmer, AK	
108	Wright, Heather	Houghton, MI	
109	Dugan, Tory M.	Girdwood, AK	
110	Taygan, Will	Anchorage, AK	Knik Group, Alaska Chapter Sierra Club
111	Blank, Patricia	Haines, AK	
112	Clark, Todd	Anchorage, AK	Alaska Outdoor Access Alliance
113	McKew, Quinn		American Rivers
114	McGuire, Thomas V.	Haines, AK	
115	Latta, Natasha	Valdez, AK	
116	Danford, Frank		
117	Heitman, Carolyn		
118	Dorstenia, Kaj	Copenhagen,	
119	Gibbins, Jennifer Shavelson, Bob Goll, Betsy Fresco, Nancy Stratton, Jim Scott, Gabriel Bristol, Tim Ritzman, Dan Virgin, Randy Williams, Deborah Huffines, Eleanor Rait, Ken	Cordova, AK Homer, AK Anchorage, AK Fairbanks, AK Anchorage, AK Cordova, AK Juneau, AK Anchorage, AK Anchorage, AK Anchorage, AK Anchorage, AK Portland, OR	Eyak Preservation Council Cook Inlet Keeper Sierra Club Northern Alaska Environmental Center National Parks Conservation Association Cascadia Wildlands Trout Unlimited Alaska Coalition Alaska Center for the Environment Alaska Conservation Solutions The Wilderness Society Campaign for America's Wilderness
120	Jones, David H.	Seattle, WA	
121	Schlacter, Judith	Eugene, OR	
122	Moran, Kate	Bolingbrook, IL	
123	Herndon, Laura	Burbank, CA	
124	Chisholm, Holly	Oxford, MI	
125	Ekman, Lea	Alexandria, VA	
126	Gutkowski, Marie	Ridgewood, NY	
127	Triplett, Tia	Los Angeles, CA	
128	Voorhies, Marilyn Voorhies, Bill	West Tremont, ME West Tremont, ME	
129	Shukla, H.	Cleveland, OH	
130	Swanson, Scott	Austin, TX	

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<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
131	Wall, James	Arnold, MO	
132	Clemens, Kimberly	Shillington, PA	
133	Nissl, Jan	Boise, ID	
134	Rosenkrantz, Stewart	Pompano Beach, F	
135	Thurmond, Roberta	Hixson, TN	
136	Eades, Debra	Greenville, SC	
137	Pratt, Don	Lexington, KY	
138	Waldron, Robert	Austin, TX	
139	Smith, Karen	Eastlake, OH	
140	Lemke, Melissa	Glens Falls, NY	
141	Ashton, Ann	Baltimore, MD	
142	Camara, Tom	Mill Valley, CA	
143	Rozelle, Shanna	Plano, TX	
144	Gilbert, Valerie	New York, NY	
145	Silver, Ronald H.	Atlantic Beach, FL	
146	Rothstein, Richard	Miami, FL	
	Rothstein, Lori	Miami, FL	
147	Acevedo, N. K.	Revere, MA	
148	Kirschling, Karen	San Francisco, CA	
149	Giniewicz, Deborah	North Oxford, MA	
150	Tostenon, Kimberly	Evansville, MN	
151	Turek, Gabriella	Pasadena, CA	
152	Jobe, Susan	Afton, MN	
153	Riley, Kelly	Hummelstown, PA	
154	Tribble, David	Lees Summit, MO	
155	Mohn, Cynthia	Campbell, OH	
156	Shalat, Harriet	Forest Hills, NY	
157	Sanchez, A.J.	Bartlesville, OK	
158	Lavoie, Monique	Amherst, QC	
159	Seaman, Richard	Evanston, IL	
160	Douglas, Virginia	Elyria, OH	
161	Picciotti, Melanie	Rochester, NY	
162	Adelman, Charlotte	Wilmette, IL	

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<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
163	Lareau, Audrey	Redwood City, CA	
164	Strebeck, Robert	Euless, TX	
165	Wall, James	Arnold, MO	
166	Daniel, Shively	Indiana, PA	
167	Smith, Stuart	Olympia, WA	
168	Vincent, Judith	Independence, OR	
169	Leeson, Mark	Orwigsburg, PA	
170	Wilson, Jerry	Finleyville, PA	
171	Moss, Paul	White Bear Lake,	
172	Hunt, Otto J.	Oceanside, CA	
173	Singer, Barbara	Chicago, IL	
174	Conn, Craig C.	Pittsburgh, PA	
175	Hunrichs, Paul	Santee, CA	
176	Larson, June	York, SC	Pug Lovers Rescue
177	Coviello, Gina	Ontario, NY	
178	Jobe, Susan	Atton, MN	
179	Brensinger, Elizabeth	New Tripoli, PA	
180	Trepes, Karen	Hammondsport, N	
181	Rush, Charlene	Pittsburgh, PA	
182	Breiding, Joan	San Francisco, CA	
183	Delker, Jennifer	Salt Lake City, UT	
184	Grasso, Dori	Cockeysville, MD	
185	Young, Jane	Catskill, NY	
186	Neiman, Karl	Arnold, PA	
187	Reina-Rosenbaum, Rose	Hillsborough, NJ	
188	Gabrisko, Tracie	New Lenox, IL	
189	Kirby, Alison	Wooster, OH	
190	DeFranco, Adam	North San Juan, C	
191	Bettmann, Joanna	Torrey, UT	
192	Reina-Rosenbaum, Rose	Hillsborough, NJ	
193	Babst, Christina	West Hollywood, C	
194	Seth, Barry	Deefield, IL	
195	Berglas, Silvia	Highland, CA	

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<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
196	Kautz, Katherine	Northglenn, CO	
197	Fouroux III, Henri Andre	New Orleans, LA	
198	Newman, Roberta E.	Mill Valley, CA	
199	Foskett, Mary Anna	Arlington, MA	
200	Beam, John	Phillipsburg, NJ	
201	Ferry, Susan	Princeton, NJ	
202	Rymer, Carlos	Ithaca, NY	
203	Gols, L.	Natick, MA	
204	Hodapp, Natalie	Mankato, MN	
205	Duncan, Michael	Buena Park, CA	
206	Sayago, Maria Sara	Placerville, CA	
207	McClintock, Cathy	Tucson, AZ	
208	Harlib, Amy	New York, NY	
209	Capotorto, Jeanette	Commack, NY	
210	Rodrigue, Jim	Gardiner, ME	
211	Welch, Joanna	Crescent City, CA	
212	Chesnutt, Judy	Brooklyn, NY	
213	Clift, Philip A.	Fulton, NY	
214	Kopp, Helen	Grafton, OH	
215	Bell, Ray	Bakersfield, CA	
216	Sexton, Mike	Junction City, KS	
217	Durham, Crystal	Reidsville, NC	
218	Burack, Debbie	New York, NY	
219	Halligan, Mary	Houston, TX	
220	Gunn, Mardell	Haines, AK	
221	Hensley, Candi	Kingsport, TN	
222	Osterberg, Nils	White Plains, NY	
223	Daniels, J. Scott	Houston, TX	
224	Hunt, Otto J.	Oceanside, CA	
226	Harrington, Sue	Piedmont, CA	
227	Updike, Kelley	Jacksonville, FL	
228	Ashton, Chris	La Mesa, CA	
229	Strader, Dow	Austin, TX	

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<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
230	Eagle, Nee	Brooklyn, NY	
231	Getz, Caroline	Hollywood, FL	
232	Delker, Jennifer	Salt Lake City, UT	
233	Smith, Diana	Seattle, WA	
234	Busse, Barbara	Phoenix, AZ	
235	Allred, Frances	El Prado, NM	
236	Brenner, Jared	New York, NY	
237	Boldt, Todd	Urbandale, IA	
238	Dale, Adrienne	Ann Arbor, MI	
239	Branyan, Jane	Marysville, PA	
240	Woods, James	Penn Valley, CA	
241	Dugan, Julia	Marysville, PA	
242	Campbell, Alicia	Manhattan Beach,	
243	Blake, Seana	Ellensburg, WA	
244	Pedersen, John	Nampa, ID	
245	Gannon, Michele	Mooresville, IN	
246	Schwartz, Sally	Milwaukee, WI	
247	Dolney, Rachel	Winter Park, FL	
248	Ledgerwood, Lynn	Olympia, WA	
249	Benenati, Scott	Westminster, CO	
250	Zajic, Daniel	North Haverhill, NH	
251	Seaman, Richard	Evanston, IL	
252	Hobbs, Melissa	Grand Ridge, FL	
253	Castellon, Leigh	El Cerrito, CA	
254	Hughes, Judy	Meredith, NH	
255	Rush, Charlene	Pittsburgh, PA	
256	Vesely, Sak	Oakland, CA	
257	Baker McCain, Melanie	Omaha, NE	
258	Gore, Jesse	Nashville, TN	
259	Yakel, Michelle	Turtle Creek, PA	
260	Benge, Regina K.	Brodhead, KY	
261	Bonilla-Jones, Carmen	Venice, FL	
262	Grasso, Dori	Cockeysville, MD	

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<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
263	Phillips, Janice	Kernersville, NC	
264	Kennedy, Bill	Kearns, UT	
265	Pollock, Jeri	Tujunga, CA	
266	Daniel, Marc	Mount Vernon, WA	
267	Devine, Lauren	Boca Raton, FL	
268	Lareau, Audrey	Redwood City, CA	
269	O'Sullivan, Joseph	Flushing, NY	
270	Burch, David Paul Xavier	South Bend, IN	
271	Wright, Heather	Houghton, MI	
272	Zeinstra, Juanita	Belmont, MI	
273	McGinness, Doris	Des Plaines, IL	
274	Daniels, J. Scott	Houston, TX	
275	Updike, Kelley	Jacksonville, FL	
276	Keefer, Nina	Longmont, CO	
277	Strader, Dow	Austin, TX	
278	Eagle, Nee	Brooklyn, NY	
279	Getz, Caroline	Hollywood, FL	
280	Smilyanov, Dimitar	Schenectady, NY	
281	Perlman, Frances	West Paris, ME	
282	Maddox, Charles	Broadway, VA	
283	Ramos, Miguel	Bellingham, WA	
284	Miller, Nancy	Prescott, AZ	
285	Esra, Nijn	Heilig Landstichting	
286	Pavitt, Bridget	London, UK	
287	Jud, Daniel	Eugene, OR	
288	Jaslow, Douglas	Arlington, VA	
289	Silver, Ronald H.	Atlantic Beach, FL	
290	Chriest, Sheryl	Eagle River, AK	
	Chriest, Shawn	Eagle River, AK	
291	Galieti, Ronald J.	San Diego, CA	
292	Miller, Nancy	Prescott, AZ	
293	Silver, Margaret	Atlantic Beach, FL	
294	Guthrie, Barbara	Seattle, WA	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
295	M., Lexi	Seaside, CA	
296	Vertrees, Gerald	Golden Valley, AZ	
298	Heasley, Lenora	Williams, AZ	
300	X, Paula	TX	
301	Rehn, Debra	Portland, OR	
302	Yung, Jackie	Salem, OR	
303	Conn, Craig C.	Pittsburgh, PA	
304	Neiman, Karl	Arnold, PA	
305	Musen, Arthur	Longmeadow, MA	
306	Zalewski, Kimberly	Livonia, MI	
307	Souza, Michael	San Diego, CA	
308	Stepanski, Dusty	Richwood, NJ	
309	Grueschow Jr., Kenneth	Milwaukee, WI	
310	Negri, Regina	Hillsdale, NY	
311	Graham, Kimberley	Coronado, CA	
312	McGlone, Colleen	New Port Richey, F	
313	Hutchison, Phyllis	Paducah, KY	
314	Riolo, Marion	Crotone,	
315	Klein, E.	Portsmouth, NH	
316	Street, Griffin	Seattle, WA	
317	Starr, Julie	South San Francis	
318	Santerre, Roger	New Paltz, NY	
319	Barkla, Paul	River Falls, WI	
320	Levy, Andrea	Toronto, ON	
321	Chasse, Joe	Ocean Park, WA	
322	Berman, Nancy	Berkeley, CA	
323	Sanders, David	Glendora, CA	
324	Cherry, Mary	Bronx, NY	
325	Georgiou, Christine	Bronx, NY	
326	Yates, Joan	Scarborough, ME	
327	Quire, Mark	Nederland, CO	
328	Miller, Janet	Burbank, CA	
329	Leeson, Mark	Orwigsburg, PA	

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
330	Ledden, Dennis	Rancho Murieta, C	
331	Major, Mark	Phoenix, AZ	
332	Halligan, Mary	Houston, TX	
333	Kittleson, Marcia	Springfield, MO	
334	Durham, Crystal	Reidsville, NC	
335	Wilson, Jerry	Finleyville, PA	
336	Lytle, Denise	Fords, NJ	
337	Mikalson, Claire	Pullman, WA	
338	Moss, Paul	White Bear Lake,	
339	LaSchiava, Dona	Phoenix, AZ	
340	Young, Jane	Catskill, NY	
341	Barton, Roberta	Albuquerque, NM	
342	Pethers, Katrina	Brisbane,	
343	Douglas, Virginia	Elyria, OH	
344	Gentile, Ronald	Ozone Park, NY	
345	Mastenbrook, Marianne	Minnesota City, MN	
346	Dollyhigh, Adrienne	Mount Airy, NC	
347	Phillips, Patricia	Kent, OH	
348	Sayago, Maria Sara	Placerville, CA	
349	Marchese, John	Henderson, NV	
350	Curotto, John	Quinebaug, CT	
351	Murphy, Ryan	Berlin, MD	
352	Kelly, Wayne	Ashland, OR	
353	Green, Jason J.	Stanardsville, VA	
354	Reede, Tim	Minneapolis, MN	
355	Gutman, Mark	Meiers Lake, AK	
356	Russell, Matthew	Loxahatchee, FL	
357	Hutchinson, Dr. Terrance A	California City, CA	
358	Wilmore, Seth	Solon, OH	
359	Babiak, Katherine	New York, NY	
360	Snead, Phyllis	Camp Creek, WV	
361	Picciotti, Melanie	Rochester, NY	
362	Boswell, Harold	Seattle, WA	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
363	Lien, David	Colorado Springs,	
364	Modarelli, David	Akron, OH	
365	Mitchell, Karen	Baltimore, MD	
366	Bell, Ray	Bakersfield, CA	
367	Grover, Ravi	Chicago, IL	
368	Premlall, Anandi	South Ozone Park,	
369	Martin, Donna	Chesterville, OH	
370	Rymer, Carlos	Ithaca, NY	
371	Bandy, Paula	Clearwater, FL	
372	Russell, Laura	Tampa, FL	
373	Adams, Kathleen	Hamilton, NJ	
374	Cooper, Jill	Bellevue, WA	
375	Rhoads, Kirk	Mountain Home, A	
376	Colon, Jannice	Lake Hopatcong, N	
377	Brooks, C. Wayne	Port Orange, FL	
378	Seth, Barry	Deefield, IL	
379	Clark, Martina	Westhampton, NJ	
380	Walters, L.	Virginia Beach, VA	
381	Becker, Marilyn	Fords, NJ	
382	Bixler, Simona	Manassas, VA	
383	Zimny, Gloria	Richmond, MI	
384	Rusch, Denyce	Fairfield, IA	
385	Werner, Kirstyn	Riverside, CA	
386	Wilson, John	Woodbury, MN	
387	Hughes, Brendan	Springfield, IL	
388	Baureis, Regina	Whitehouse Station	
389	Graf, Rosemary	Cummington, MA	
390	Navarrete, Patty	Taos, NM	
391	Pan, Pinky Jain	Santa Rosa, CA	
392	Faszczewski, Joan	Springfield, NJ	
393	Thomson, Arran	Portland, OR	
394	Sternberg, Lewis	Tigard, OR	
395	Amato, Gwendoline	East Greenwich, RI	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
396	Breiding, Joan	San Francisco, CA	
397	Lewis, Judi	Omaha, NE	
398	DeSousa, Sarah	Spring Branch, TX	
399	Root, Charlene	Whittier, CA	
400	Ferris, C.	Pollock Pines, CA	
401	Costeas, Lanie	Chicago, IL	
402	Mastri, Frank	Bridgeport, CT	
403	Donnici, Anthony	Kansas City, MO	
404	Fairfield, John	San Francisco, CA	
405	Perry, Mary-Ellen	Cambridge, MA	
406	Johnson, Curtis	Green River, WY	
407	Obudzinski, Dirk	Sedona, AZ	
408	Mastri, Frank	Bridgeport, CT	
409	Bellemare, Renee'	North Berwick, ME	
410	Graziosa, Sara	East Canaan, CT	
411	Ely, Thomas	Haines, AK	
412	Herdiska, Robert	Tucson, AZ	
413	Kosar, Mary Lou	Newton Falls, OH	
414	Voorhies, Bill	West Tremont, ME	
415	Lynch, Gail	Nashua, NH	
416	Lynch, Gail	Nashua, NH	
417	Mustich, Joseph A.	Washington, CT	
418	Ford, James	Southport, CT	
419	Mohn, Cynthia	Campbell, OH	
420	Williams-West, Jeanie	Mer Rouge, LA	
421	Meyer, Robert G.	Flagstaff, AZ	
422	Comeskey, John	Dayton, OH	
423	Sherzer, Harry	Foster, RI	
424	Oberg, Pamela	Somersworth, NH	
425	Reina-Rosenbaum, Rose	Hillsborough, NJ	
426	Baron, Stewart	Tucson, AZ	
427	Hyatt, Donald	Columbus, OH	
428	Olnas, Juli	Lake Bluff, IL	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
429	dePadova, E.	Parsippany, NJ	
430	Koteles, Patty	Broadview Heights,	
431	Hafer, Sarah	Eugene, OR	
432	Fenster, Steven	Piscataway, NJ	
433	Oseman, Nance	Carlotta, CA	
434	Cueny, Colleen	Ferndale, MI	
435	Pattantyus, Nik	Ardmore, PA	
436	Foskett, Mary Anna	Arlington, MA	
437	Kirby, Alison	Wooster, OH	
438	Loria, Steven	Garrison, NY	
439	Dunkleberger, David	Doylestown, PA	
440	Martinez, Doreen E.	Flagstaff, AZ	
441	Fouroux III, Henri Andre	New Orleans, LA	
442	Hval, Patricia	Westerly, RI	
443	Wyse, Frank	Mesa, AZ	
444	Hunt, Becklau	Cincinnati, OH	
445	Hettinger, Ann	Champaign, IL	
446	Buehl, Barbara	Eden Prairie, MN	
447	Woods, Julie	Chelsea, MI	
448	Murray, Cristy	Oregon City, OR	
449	Taylor, LeeAnn	Chico, CA	
450	Figueiredo, Eva	Lisboa, AL	
451	Plato, Barry	Bel Air, MD	
452	Coviello, Gina	Ontario, NY	
453	Simmons, Barre	Springfield, VA	
454	Haskell, Michael	Scarborough, ME	
455	Ploeg, Johan F.	Cloverdale, OR	
456	Fogleman, Maxwell	Prescott, AZ	
457	Eiterman, Elisabeth	Columbus, OH	
458	Yurkiw, Dorothy	Lakewood, OH	
459	Kulcsar, michael	Euclid, OH	
460	Koenig, Stephen	Holland, PA	
461	Cox, Vickie	Enumclaw, WA	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
462	Rosales, Lisa	Chillicothe, OH	
463	Vincent, Judith	Independence, OR	
464	McCoy, Cherie	Kettering, OH	
465	Cail, Bonnie	Kettering, OH	
466	Stauffer, Sybil	Dayton, OH	
467	Mullen, Elizabeth J.	Hamilton, OH	
468	Cosgriff, Mark	Lakewood, OH	
469	Romans, Jennifer	Lake Forest, IL	
470	Kurland, Miriam Beth	Mansfield Center,	
471	Doyle, Patricia	Garrettsville, OH	
472	Engstrom, Neil	Lincoln, NE	
473	Martin-Brodak, Diane	Holly, MI	
474	Smith, Deanna	Phoenix, AZ	
475	Joranko, Roberta	Columbus, OH	
476	Lopez, Carmen	Cham,	
477	Bixler, Simona	Manassas, VA	
478	Berg, Samuel	Newberg, OR	
479	Wolf, Susan	Cherry Hill, NJ	
480	Tildes, Katherine	Athens, OH	
481	Giammatteo, Joseph	Cabin John, MD	
482	Hand, David	Garnerville, NY	
483	Thu, Eric	Tucson, AZ	
484	Jerden, Beverly	Sherwood, OR	
485	Metcalf, Steve	Warwick, RI	
486	McCleary, Harriet	Minneapolis, MN	
487	Stahl, Charlotte	Gresham, OR	
488	Hydinger, Carol	Columbus, OH	
489	Bebber-Wells, Rebecca	Brooklyn, WI	
490	Hessel, Sue	Lyme, CT	
491	Dunham, Christopher	Bridgeport, CT	
492	Strebeck, Robert	Euless, TX	
493	Murphy, Ryan	Berlin, MD	
494	Mayo, Michael John	Syracuse, NY	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
495	Wasman, Donna	Sevierville, TN	
496	Schwarz, Charles	Intervale, NH	
497	Poulson, Judi	Fairmont, MN	
498	Jacobsen, Paul	Dallas, OR	
499	Hafer, Sarah	Eugene, OR	
500	Clark, Stuart G.	Waterford, MI	
501	Cross, Heather	Redford, MI	
502	Rae, Erika	Saint Paul, MN	
503	Hill, William Kay	Portland, OR	
504	Huber, Alycia	Tularosa, NM	
505	Family, Zmuda	Chillicothe, OH	
506	Cassidy, Doris	Yuma, AZ	
507	Hermann, Richard	Richmond, VA	
508	Moore, Audrey	Selma, OR	
509	Burns, David	Bay City, MI	
510	Martin, Diane	Scottsdale, AZ	
511	Mitchell, Glen	Blacksburg, VA	
512	Taylor, LeeAnn	Chico, CA	
513	Gibbs-Halm, Deborah	Grand Blanc, MI	
514	Newton, Peter	Tucson, AZ	
515	Ferguson, Joanne	Sheffield Lake, OH	
516	Hyland, Anne	Falmouth, ME	
517	Knox, Janet	Gainesville, VA	
518	Saecker, John	Edina, MN	
519	Escobar, Annette	Miami, FL	
520	Sullivan, Kate	Satellite Beach, FL	
521	Jones, Gloria	Hialeah, FL	
522	Luke, Keith	New Port Richey, F	
523	Patrello, S.	Hudson, FL	
524	Chinni, Adrienne	Cleveland Heights,	
525	Fogler, Marah	Tucson, AZ	
526	Hyatt, Donald	Columbus, OH	
527	Wieland, Loren	Fort Myers, FL	

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<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
528	Murphy, Emmett J.	Venice, FL	
529	Gomez, Maria	Mountain Home, A	
530	Moreno, Olyme	Miami, FL	
531	Kuny, Megaera	Point Of Rocks, M	
532	Woerpel, D.V.M., Richard W.	Simi Valley, CA	
533	Doran, Bonnie	Placerville, CA	
534	Chapin, Ginger	Greenwich, CT	
535	Field, Kimberly	North Palm Beach,	
536	Coon, Julie	Lima, OH	
537	Enevoldsen, David	San Jose, CA	
538	Newman, Roberta E.	Mill Valley, CA	
539	Wold, Amy	Rochester, MN	
540	Jones, David H.	Seattle, WA	
541	Shively, Daniel	Indiana, PA	
542	Lien, David	Colorado Springs,	
543	Trepes, Karen	Hammondsport, N	
544	Duncan, Michael	Buena Park, CA	
545	Taylor, Melissa	Valparaiso, IN	
546	Chartier, Michele	Warwick, RI	
547	Dale, Adrienne	Ann Arbor, MI	
548	Woods, James	Penn Valley, CA	
549	Blake, Seana	Ellensburg, WA	
550	Pederson, John	Nampa, ID	
551	Gannon, Michele	Mooresville, IN	
552	Manuel, Dave	Arlington, WA	
553	Duffy, Abigail	Quincy, MA	
554	Dolney, Rachel	Winter Park, FL	
555	Ledgerwood, Lynn	Olympia, WA	
556	Zajic, Daniel	North Haverhill, NH	
557	Hobbs, Melissa	Grand Ridge, FL	
558	Facette, Jim	Honolulu, TX	
559	Berglas, Silvia	Highland, CA	
560	Woomer, JoAnna	Tyrone, PA	

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
561	Johnson, Carrie	Eustis, FL	
562	Brogan, Loretta	Shreveport, LA	
563	Cleland, C.	Miami, FL	
564	Wilson, Jerry	Finleyville, PA	
565	Gray, Carol	Bloomington, IN	
566	Hodapp, Natalie	Mankato, MN	
567	Sulanke, Thom	Bloomington, IN	
568	Christofus Blackstone, Deborah	Middlesboro, KY	
569	Maloney, Kristie	Antioch, CA	
570	Kosek, Kateri	Hopewell Jct, NY	
571	Enevoldsen, David	San Jose, CA	
572	Burch, David Paul Xavier	South Bend, IN	
573	Clemens, Kimberly	Shillington, PA	
574	Olsen, Scott	Jenks, OK	
575	Babst, Christina	West Hollywood, C	
576	Santerre, Roger	New Paltz, NY	
577	Herndon, Laura	Burbank, CA	
578	Allred, Frances	El Prado, NM	
579	Pan, Pinky Jain	Santa Rosa, CA	
580	Devine, Lauren	Boca Raton, FL	
581	Lemke, Melissa	Glens Falls, NY	
582	Wood, Margaret	Suffolk, VA	
583	Rodrigue, Jim	Gardiner, ME	
584	Maddox, Charles	Broadway, VA	
585	Burch, David Paul Xavier	South Bend, IN	
586	Koteles, Patty	Broadview Heights,	
587	Amato, Gwendoline	East Greenwich, RI	
588	Gilbert, Valerie	New York, NY	
589	Jones, Gloria	Hialeah, FL	
590	Bafik-Vehslage, Michelle	San Antonio, TX	
591	Bashen, Melinda	Alexandria, VA	
592	Souza, Michael	San Diego, CA	
593	Capotorto, Jeanette	Commack, NY	

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
594	Lytle, Denise	Fords, NJ	
595	McClintock, Cathy	Tucson, AZ	
596	Turek, Gabriella	Pasadena, CA	
597	Wiley, Carol	Victorville, CA	
598	Welch, Joanna	Crescent City, CA	
599	Chalkley, Celena	Palm Coast, FL	
600	Swanson, Scott	Austin, TX	
601	Donnici, Anthony	Kansas City, MO	
602	Riolo, Marion	Crotone,	
603	Keefer, Nina	Longmont, CO	
604	Ashton, Ann	Baltimore, MD	
605	Wieland, Loren	Fort Myers, FL	
606	O'Sullivan, Joseph	Flushing, NY	
607	Acevedo, N. K.	Revere, MA	
608	Donnelly, Stephen	Easthampton, MA	
609	Simon, Philip	San Rafael, CA	
610	Modarelli, David	Akron, OH	
611	Lambrecht, Gretchen	Durango, CO	
612	Poulson, Judi	Fairmont, MN	
613	Dale, Adrienne	Ann Arbor, MI	
614	Giniewicz, Deborah	North Oxford, MA	
615	Vertrees, Gerald	Golden Valley, AZ	
616	Williams-West,	Mer Rouge, LA	
617	Ekman, Lea	Alexandria, VA	
618	Kirby, Alison	Wooster, OH	
619	Ferris, C.	Pollock Pines, CA	
620	Kennedy, Bill	Kearns, UT	
621	Zalewski, K.	Brighton, MI	
622	Ledgerwood, Lynn	Olympia, WA	
623	Gannon, Michele	Mooresville, IN	
624	Phillips, Janice	Kernersville, NC	
625	Haugen, Lisa	Kearney, MO	
626	Desbrow, Stacy	Newport Beach, C	

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
627	Riley, Kelly	Hummelstown, PA	
628	Thomson, Arran	Portland, OR	
629	Comeskey, John	Dayton, OH	
630	Sanders, David	Glendora, CA	
631	Colon, Jannice	Lake Hopatcong, N	
632	Cosgriff, Mark	Lakewood, OH	
633	Bettmann, Joanna	Torrey, UT	
634	Bauer, Kim	Lancaster, CA	
635	Curtis, Kevin L.	Fullerton, CA	
636	Bail, Joseph	Clearwater, FL	
637	Ob Buckley, Todd	Durham, NC	
638	Olsen, Scott	Jenks, OK	
639	Mason, Lorraine	Oxford, PA	
640	Dorstenia, Kaj	Copenhagen,	
641	Burns, Deborah	Dayton, OH	
642	Shadrick, Roxann	Decatur, IL	
643	Chaney, Trish	Colorado Springs,	
644	Patch, Frances	Takoma Park, MD	
645	Gibbs-Halm, Deborah	Grand Blanc, MI	
646	Leonard, Richard	New York, NY	
647	Brensinger, Elizabeth	New Tripoli, PA	
648	Anixter, Shelley	San Francisco, CA	
649	Spotts, Richard	Saint George, UT	
650	Galieti, Ronald J.	San Diego, CA	
651	Desbrow, Stacy	Newport Beach, C	
652	Johnson, Matt	Santa Monica, CA	
653	Ringe, Axel C.	New Market, TN	
654	Mihok, Michael	Bayville, NJ	
655	Fitch, James	Pittsburgh, PA	
656	Williams, Paul	Atlantic City, NJ	
657	Evans, Michael W.	Los Angeles, CA	
658	Wick, David	Jonesboro, AR	
659	Robinson, Tammy	Asheboro, NC	

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
660	Anderson, Corina	Bakersfield, CA	
661	Jorgensen, James H.	Ames, IA	
662	Bluhm, Pamala	Culver City, CA	
663	Shook, Amy	Brookhaven, PA	
664	Burdin, Jared	Camano Island, W	
665	Hunrichs, Paul	Santee, CA	
666	Bond, Alyssa	Rockport, TX	
667	Wyer, D.	Horseheads, NY	
668	Sweel, Greg	Santa Monica, CA	
669	Butler, Darrol	Redding, CA	
670	Davis, William	Carmichael, CA	
671	Marks, Linda	Sunland, CA	
672	Singer, Barbara	Chicago, IL	
673	Davis, Laurie	Carmichael, CA	
674	Smith, Janice	Kingsville, TX	
675	Haugen, Lisa	Kearney, MO	
676	Wiley, Carol	Victorville, CA	
677	Smith, Stuart	Olympia, WA	
678	Gintz, Aimee	Dover, OH	
679	Urani, Thomas	San Francisco, CA	
680	Brown, Michael	Chattanooga, TN	
681	Walker, Elizabeth	Waverly, TN	
682	Thompson, Cheryl	Winthrop, ME	
683	Gregory, Branwen	Los Angeles, CA	
684	Gregory, Probyn	Los Angeles, CA	
685	Gaydon, Sandra	Defuniak Springs,	
686	Prosperie, Johnnie	Nacogdoches, TX	
687	Chalkley, Celena	Palm Coast, FL	
688	Bafik-Vehslage, Michelle	San Antonio, TX	
689	Colon, Jannice	Lake Hopatcong, N	
690	Shelton, Mary	Banner Elk, NC	
691	Becker, Karen	Ventura, CA	
692	Cosgriff, Mark	Lakewood, OH	

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<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
693	Brooks, Pamela	Logan, OH	
694	Handwerker, Steven	Boca Raton, FL	
695	Lambrecht, Gretchen	Durango, CO	
696	Myers, Adele	Meadow Valley, CA	
697	Hert, Diane	Canton, OH	
698	Donnelly, Stephen	Easthampton, MA	
699	Wright, Heather	Houghton, MI	
700	McGinness, Doris	Des Plaines, IL	
701	Clark, Martina	Westhampton, NJ	
702	Kosek, Kateri	Hopewell Jct, NY	
703	Shohan, Doug	Lee, MA	
704	Bail, Joseph	Clearwater, FL	
705	Graziosa, Sara	East Canaan, CT	
706	Manuel, Dave	Arlington, WA	
707	Gutkowski, Marie	Ridgewood, NY	
708	Daniels, J. Scott	Houston, TX	
709	Brown, Michael	Chattanooga, TN	
710	Sweel, Greg	Santa Monica, CA	
711	Evans, Michael W.	Los Angeles, CA	
712	Hermann, Richard	Durham, NC	
713	Mikalson, Claire	Pullman, WA	
714	Mohn, Cynthia	Campbell, OH	
715	Horn, Lenora	AZ	
716	Tribble, David	Lees Summit, MO	
717	Clift, Philip A.	Fulton, NY	
718	Spotts, Richard	Saint George, UT	
719	Dunkleberger, David	Doylestown, PA	
720	Anderson, Corina	Bakersfield, CA	
721	Heinold, Christian	Oakland, CA	
722	Lien, David	Colorado Springs,	
723	Oberg, Pamela	Somersworth, NH	
724	Russell, Laura	Tampa, FL	
725	Fogleman, Maxwell	Prescott, AZ	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
726	Wold, Amy	Rochester, MN	
727	Martin, Diane	Scottsdale, AZ	
728	Gols, L.	Natick, MA	
729	Burack, Debbie	New York, NY	
730	Strader, Dow	Austin, TX	
731	Marks, Linda	Sunland, CA	
732	Loria, Steven	Garrison, NY	
733	Voorhies, Bill	West Tremont, ME	
734	Rehn, Debra	Portland, OR	
735	Fitch, James	Pittsburgh, PA	
736	Jorgensen, James H.	Ames, IA	
737	Jud, Daniel	Eugene, OR	
738	Bluhm, Pamala	Culver City, CA	
739	Wendt, Diana	Oakland, CA	
740	Yates, Joan	Scarborough, ME	
741	Pavitt, Bridget	London, UK	
742	Jones, David H.	Seattle, WA	
743	Maloney, Kristie	Antioch, CA	
744	Prosperie, Johnnie	Nacogdoches, TX	
745	Phillips, Patricia	Kent, OH	
746	Chisholm, Holly	Oxford, MI	
747	Buehl, Barbara	Eden Prairie, MN	
748	Ledden, Dennis	Rancho Murieta, C	
749	Zajic, Daniel	North Haverhill, NH	
750	Becker, Karen	Ventura, CA	
751	Benge, Regina K.	Brodhead, KY	
752	Chartier, Michele	Warwick, RI	
753	Joranko, Roberta	Columbus, OH	
754	Dolney, Rachel	Winter Park, FL	
755	Benenati, Scott	Westminster, CO	
756	Chesnutt, Judy	Brooklyn, NY	
757	Romans, Jennifer	Lake Forest, IL	
758	Hughes, Brendan	Ridgecrest, CA	

Ring of Fire Proposed RMP/ Final EIS

<u>Submission #</u>	<u>Person:</u>	<u>Location:</u>	<u>Organization:</u>
759	Chinni, Adrienne	Cleveland Heights,	
760	Ramos, Miguel	Bellingham, WA	
761	Bauer, Kim	Lancaster, CA	
762	Bonilla-Jones, Carmen	Venice, FL	
763	Huggins, William	Las Vegas, NV	
764	Camara, Tom	Mill Valley, CA	
765	Brenner, Jared	New York, NY	
766	Guthrie, Barbara	Shoreline, WA	
767	Vesely, Sak	Oakland, CA	
768	Ferguson, Joanne	Sheffield Lake, OH	
769	Woerpel, D.V.M., Richard W.	Simi Valley, CA	
770	Martin-Brodak, Diane	Holly, MI	
771	Brooks, Pamela	Logan, OH	
772	Brooks, Bo	Logan, OH	
773	Hedges, Buddy	Logan, OH	
774	Brooks, Winnie	Logan, OH	
775	Hedges, Christopher	Logan, OH	
776	Frank, Harriette	Durham, NC	
777	Zimny, Gloria	Richmond, MI	
778	Rosenkrantz, Stewart	Pompano Beach, F	
779	Wasman, Donna	Sevierville, TN	
780	Gintz, Aimee	Dover, OH	
781	Shukla, H.	Concord, CA	
782	Woomer, JoAnna	Tyrone, PA	
783	Thornley, Emily	Oregon City, OR	
784	Berman, Nancy	Berkeley, CA	
785	Kelly, Wayne	Ashland, OR	
786	Thompson, Cheryl	Winthrop, ME	

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