

Chapter III: Public Involvement

Scope

The BLM developed a communication plan to involve the public in the review process through newspaper ads, press releases, direct mailings, and briefings. The communication plan initially called for a public website, but internet access to BLM's website was interrupted due to the *Cobell vs Norton* litigation. A site was eventually developed and placed on the BLM National website late in the public comment period. Advertisements were placed in the 3 major newspapers, 3 regional papers and the BLM's external newsletter *BLM Alaska Frontiers*, which reaches more than 3,500 individuals and groups interested in BLM resource management issues. The comments from the public and other agencies were incorporated into the area matrix analysis in Chapter II. *See pages 14-37, Area Matrices.*

Newspaper distribution consisted of 4-6 inch ads publishing the week before the public comment period.

Major publications once on Sunday, Wednesday, Friday:
Anchorage Daily News
Fairbanks Daily News Miner
Juneau Empire

Regional publications once only:
Copper Valley Bi-Weekly
Mukluk News
Nome Nugget

BLM Publication once only:
Alaska Frontiers Winter 04-05
Alaska Frontiers Summer 05

BLM reviewing withdrawn lands

The Bureau of Land Management is seeking public comment on withdrawn federal lands which could be lifted to allow mining and mineral leasing. The "d-1 withdrawals," authorized under section 17 (d) (1) of the Alaska Native Claims Settlement Act, closed millions of acres of federal land in Alaska. The BLM will make recommendations in a Congressional Report due in 2006. The public is invited to view maps and obtain more information at BLM offices in:

ANCHORAGE - Alaska State Office
Public Information Center
222 W. Seventh Ave. • 907-271-5960

FAIRBANKS - Northern Field Office
Public Information Center
1150 University Ave. • 907-474-2251 or 907-474-2252

GLENNALLEN - Glennallen Field Office
Mile 186.5 Glenn Highway • 907-822-3217

KOTZEBUE - Kotzebue Field Station
207 Third St. • 907-442-3430

NOME - Nome Field Station
Federal Building, 240 Front St.
• 907-443-2177

JUNEAU - John Rishel Juneau Mineral Information Center
100 Savikko Rd. • 907-364-1554

Send written comments by **Sept. 15, 2005** to:
BLM Alaska State Office
Attn: Sec. 207 Congressional Report
AK-932
222 W. 7th Ave. #13
Anchorage AK 99513-7599

*Questions? Call BLM realty specialist
Dave Mushovic at 907-2713293.*

BLM

Alaska



The mailing included State and local government agencies, federal agencies, Native organizations, industry associations, and environmental groups. An initial 707 stakeholder letters, 84 packets consisting of a fact sheet, the 2 statewide maps, and 12 area maps were mailed. *See pages 45-58, Mailing List.*

No public meetings were held, but briefings were provided upon request. The BLM briefed affected federal agencies, the Alaska Congressional delegation, the Special Assistant to the Secretary for Alaska, the State of Alaska, Lake Peninsula Borough, Yakutat Borough, Eyak

Sec. 207 of the Alaska Land Transfer Acceleration Act

Tribal Council, Alaska Coalition, and the Alaska Miners Association. In addition the BLM regularly briefed the BLM Resource Advisory Council (RAC), who also reviewed the report at critical junctures.

Summary

The BLM's public outreach generated approximately 102 inquiries or requests for information packets and maps. Seven news organizations including radio and newspapers conducted interviews with BLM staff which resulted in additional statewide coverage. *See pages 45-58, Mailing List.*

The BLM received only 10 written comments from government agencies, or the public, including one which was a compilation from 10 major environmental groups (Alaska Coalition). In general, the comments were split with 5 supporting lifting all d-1 withdrawals, and 5 supporting maintaining all d-1 withdrawals. All comments included some specific qualifications or concerns for certain geographic areas. Specific concerns are addressed in the individual area analysis where applicable. *See pages 60-114, Public Comments.*

Although a strong advocate of the original Section 207 proposed legislation, the Alaska Miners Association (AMA) did not submit any comments during the comment period. In briefings with the AMA, their preference was to expedite the report process to coincide with the current federal budget cycle and they stated that a 90 day public comment period was too long.

The AMA originally surmised a great deal more public lands were actually affected by d-1 withdrawals. The AMA acknowledged that lifting d-1 withdrawals in national parks or refuges would not open the lands to locatable mineral entry. The AMA was primarily focused on BLM-administered lands, particularly the Steese National Recreation Area and Forest Service-administered lands. The AMA is most interested in areas with known mineral potential. The majority of these lands are already opened to entry or selected by the State of Alaska or Native corporations, and the selections segregate the land to entry independent of the d-1 withdrawals.

The commonality in many of the comments received is the preference for the land use planning process as the appropriate mechanism for reviewing withdrawals. Some comments from environmental groups concern recommendations developed during current RMP efforts. The RMP efforts that have progressed sufficiently to address d-1 withdrawals have been incorporated in the analysis portion of this report. Other comments from the environmental groups challenge the legality of the report process and the need for additional review of a draft report. These comments are outside the scope of the report and are not addressed.



News

Bureau of Land Management, Alaska State Office, External Affairs
222 W. 7th Avenue #13, Anchorage AK 99513-7599
Tel: 907-271-5555 Fax: 907-271-5421

FOR IMMEDIATE RELEASE

**Contact: Dave Mushovic, 907. 271.3293
Or Susan Lavin, 907.271.3826**

News Release No. 05-16

Date: 6/22/05

Public Has Opportunity to Comment on Opening of BLM Withdrawn Lands

Anchorage-Until September 15, the Bureau of Land Management will accept comments from the public on whether withdrawn public land in Alaska should be open to entry under public land laws which includes mining and mineral leasing. Currently millions of acres of federal land are withdrawn under public land orders for study and classification purposes. Although these lands are reviewed for opening under the current BLM planning process, its timeframes and schedules can be lengthy and many stakeholders want a more expeditious process. In response, BLM has been asked to submit a report due to Congress in 2006 recommending whether withdrawn lands can be open to entry.

Many of these withdrawn lands, referred to as d-1 withdrawals because the public land orders withdrawing these lands were authorized under Section 17(d) (1) of the Alaska Native Claims Settlement Act, are selected by the State of Alaska or Native corporations and are included in other administrative or Congressional withdrawals. Even if withdrawals are lifted, selected lands will remain segregated until the land is conveyed or selections are relinquished. Some lands under study include national wildlife refuge, park and forest systems and conservation units which may have more restrictive or additional administrative procedures to follow before mining or leasing can occur.

The public can review maps depicting withdrawn lands at BLM offices in Anchorage, Fairbanks, Kotzebue, Nome and Juneau. A 90-day comment period ends September 15 and people are encouraged to visit those BLM offices to view maps of the withdrawn areas. Additional information and copies of the maps can be obtained by calling Dave Mushovic at 271-3293 or Susan Lavin at 271-3826.

The report BLM is preparing is advisory in nature and no environmental analysis is required under the National Environmental Policy Act. The BLM will focus its recommendations on BLM managed lands, but will incorporate recommendations from other federal land management agencies into the report.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Alaska State Office

222 West Seventh Avenue, #13

Anchorage, Alaska 99513-7599

<http://www.ak.blm.gov>



Dear Stakeholders:

The Bureau of Land Management (BLM) is preparing a report for the Secretary of the Interior to submit to Congress. The report will review certain Public Land Orders (PLOs) that withdrew millions of acres of Federal land in Alaska for study and classification purposes. The report will consider whether any of these withdrawn lands should be opened to entry under the public land laws, including mining or mineral leasing. Through this letter and other public notice, BLM is requesting comments regarding opening the withdrawn lands during a 90-day comment period ending Sept. 15, 2005.

The PLOs under review are a series of orders issued by the Secretary of the Interior in the 1970's under the authority of Section 17(d)(1) of the Alaska Native Claims Settlement Act (ANCSA) and are referred to as "d-1" PLOs or withdrawals. Most of the original d-1 withdrawals closed or segregated the lands from entry under all the public land laws including mining and mineral leasing laws. One exception was 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. The BLM's current land use planning process serves as the means to review the d-1 withdrawals and make determinations regarding opening lands. However, schedules, time-frame requirements, and priorities for this process are a frustration for many stakeholders. In response to this concern, Congress, through the Alaska Land Transfer Acceleration Act of Dec. 10, 2004, directed the Secretary to submit a report that determines if any lands withdrawn by the d-1 PLOs can be opened to entry.

In many instances, the lands withdrawn by the d-1 PLOs are included in other administrative or Congressional withdrawals or are selected by the State of Alaska or ANCSA Native corporations. Each additional withdrawal or selection has its own independent authority and closes or segregates the lands to certain uses based on its own terms. Many d-1 withdrawals include lands that have now been added to the National Wildlife Refuge, Park and Forest systems or other conservation system units. The federal managing agency for these units will be asked to review and submit comments.

The BLM will make recommendations for d-1 lands managed by BLM and is responsible for preparing the overall report. Preparation and submission of the report is advisory only and not an action requiring environmental analysis under the National Environmental Policy Act (NEPA).

Maps showing the d-1 withdrawal lands are available for review at the following BLM offices:

- Alaska State Office, Public Information Center, 222 W. 7th Ave, Anchorage, tele. 907.271.5960
- Northern Field Office, Public Information Center, 1150 University Ave, Fairbanks, tele. 907.474.2251 or 907.474.2252
- Glennallen Field Office, Mile 186.5 Glenn Highway, Glennallen, tele. 907.822.3217
- Kotzebue Field Station, 207 Third Street, Kotzebue, tele. 907. 442.3430
- Nome Field Station, Federal Building, 240 Front Street, Nome, Alaska, tele. 907.443.2177
- Juneau Mineral Information Center, 100 Savikko Road, Douglas, tele. 907.364.1554

A set of maps can be provided upon written request at the address listed below.

Send written comments and maps requests to:

Bureau of Land Management
Alaska State Office
Attn: Section 207 Congressional Report (AK-932)
222 West Seventh Avenue, #13
Anchorage, Alaska 99513-7599

Direct questions to Dave Mushovic, 907-271-3293 or Susan Lavin, 907-271-3826.

Sincerely yours,

Henri Bisson
Alaska State Director

Sec. 207 of the Alaska Land Transfer Acceleration Act

Fact Sheet

What is the action?

The Bureau of Land Management (BLM) is preparing a report for the Secretary of the Interior to submit to Congress in accordance with Section 207 of the Alaska Land Transfer Acceleration Act of Dec. 10, 2004, Public Law 108-452. This law requires:

Not later than 18 months after the date of enactment of this Act the Secretary shall:

- Review withdrawals made pursuant to Section 17(d)(1) of the Alaska Native Claims Settlement Act (ANCSA) hereafter “d-1” to determine if any portion of the withdrawn lands can be opened to entry under the public land laws
- Provide for public notice and comment
- Submit to House and Senate committees a report that makes recommendations as to lands that can be opened

What are “d-1” withdrawals?

The d-1 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 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. It will be many years before BLM can complete land use plans on all of the d-1 lands it currently manages.

What will happen?

There are millions of acres of Federal lands withdrawn by the d-1 PLOs. The BLM will review and map the d-1 PLOs and identify the specific closures authorized by each order. The BLM will assess each BLM-managed area 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.

Other Federal agencies also manage lands subject to d-1 withdrawals. Many of the additions to the National Wildlife Refuge System, the National Park System, and the National Forest System created by the Alaska National Interest Lands Conservation Act (ANILCA) were previously included in d-1 withdrawals. These Federal agencies will be asked to make recommendations on whether to lift or maintain the d-1 withdrawals on lands under their jurisdiction.

The report to Congress will contain recommendations as required by Section 207. This report is advisory only and does not require environmental analysis under the National Environmental Policy Act (NEPA).

Many d-1 lands are also included in other administrative withdrawals or Congressional withdrawals established under independent authorities other than d-1. Also many d-1 lands are segregated from appropriation under the public land laws by State of Alaska or ANCSA Native corporation selections.

Sec. 207 of the Alaska Land Transfer Acceleration Act

Overlapping withdrawals independent of d-1 PLOs and selection applications will continue to keep lands closed under their own terms regardless of any recommendation or action on the d-1 withdrawals.

How is the public involved?

The law requires the Secretary to provide an opportunity for public notice and comment. Public notice of the report is being done through direct mailing, newspaper ads, agency publications, and press releases. The BLM is providing a 90 day public comment period.

What information is displayed on the maps?

The two statewide maps display lands that are affected by the d-1 withdrawals, the location of existing federally recorded mining claims, and pending selections filed by the State of Alaska and ANCSA Native corporations. One map shows BLM-managed lands located outside of conservation system units and special areas designated by ANILCA. The other map shows d-1 lands located within conservation system units (refuges, parks, wild and scenic rivers), national conservation and recreation areas, and national forests. Please note on the legends for both statewide maps that the green and purple colors indicate the two general categories of the segregation of the land created by the d-1 withdrawals.

Both statewide maps are divided into 12 geographic areas. For each of these 12 areas, there is a map that identifies individual d-1 withdrawals, conservation system units, and pending State and Native selections. For the area maps, the lands previously denoted in purple are further broken down and each d-1 withdrawal is individually identified by color. The map legend identifies the PLO number and the extent of the segregation created by the individual d-1 withdrawal.

How do I make comments?

We suggest you use the two statewide maps to locate areas of interest and importance to you to determine whether these areas are affected by d-1 withdrawals. Then review the specific area map for those locations to obtain more detailed information.

Please submit your comments and supporting rationale as to which lands withdrawn by the d-1 PLOs can be opened to entry or if the d-1 withdrawal should be maintained. To help assess the comments please include:

- Area map number(s) 1 through 12 as well as other geographic references that would help identify specific lands that concern you. *For example: Area Map 2, twelve miles due north of Chicken.*
- Reference to PLO number for the specific d-1 withdrawal
- Specific information or knowledge of the area or its resources that concerns you

Send written comments to:

Bureau of Land Management
Alaska State Office
Attn: Section 207 Congressional Report (AK-932)
222 W. Seventh Ave., #13
Anchorage, Alaska 99513-7599

BLM Alaska Section 207 Congressional Report Mailing List 06/10/05 (707 total/84 letters & maps/623 letters only)													
First Name	Last Name	Suff.	Organization	Address1	Address2	City	ST	Zip	Group Name	Received Maps	Requested Info or Maps	Submitted Comments	Undeliverable
RESOURCE ADVISORY COUNCIL													
1	GREGORY		BRISTOL ENV & ENG SERVICES CORP	2000 W INTERNATIONAL AIRPORT RD #C1		ANCHORAGE	AK	99502	AKRAC	X			
2	CHARLIE		USIBELLI COAL MINE INC	100 CUSHMAN ST STE 210		FAIRBANKS	AK	99701	AKRAC	X			
3	TOM		ALASKA DNR	9501 NETTLETON DRIVE		ANCHORAGE	AK	99507	AKRAC	X			
4	PHILIP		MIDNIGHT SUN ADVENTURES	1306 E 26TH AVE		ANCHORAGE	AK	99508	AKRAC	X			
5	RANDALL		SOURDOUGH FUEL	PO BOX 81109		FAIRBANKS	AK	99708-1109	AKRAC	X			
6	TERESA		ARCTIC SLOPE REG CORP	3900 C ST STE 801		ANCHORAGE	AK	99503-5963	AKRAC	X			
7	SANDRA		KEY	PO BOX 790		COOPER LANDING	AK	99572	AKRAC	X			
8	JUNE		CALISTA CORP	301 CALISTA CT # A		ANCHORAGE	AK	99518-3028	AKRAC	X			
9	SUZANNE		RIVER WRANGELLERS	PO BOX 146		GLENNALLEN	AK	99586	AKRAC	X			
10	SUSAN		AK QUIET RIGHTS COALITION	8601 SULTANA DR		ANCHORAGE	AK	99516	AKRAC	X			
11	JIM		MUNICIPAL LIGHT POWER	1200 E FIRST AVE		ANCHORAGE	AK	99501	AKRAC	X			
12	LARRY AND JUNE		FORTYMILE RIVERBOAT TOURS	PO BOX 101		EAGLE	AK	99738	AKRAC	X			
13	KEITH		TRYCK CONSULTING	3060 ADMIRALTY BAY DR		ANCHORAGE	AK	99515	AKRAC	X			
14	DAVID		ARCTICWILD	PO BOX 80562		FAIRBANKS	AK	99708	AKRAC	X			
STATE OF ALASKA													
15			AK COASTAL MGMT PROGRAM	302 GOLD ST STE 202		JUNEAU	AK	99801	STATE OF ALASKA	X			
16			AK COASTAL MGMT PROGRAM	550 W 7TH AVE STE 1660		ANCHORAGE	AK	99501	STATE OF ALASKA	X			
17			OFC OF THE GOVERNOR	550 W 7TH AVE STE 1700		ANCHORAGE	AK	99501	STATE OF ALASKA	X			
18			OFC OF THE GOVERNOR	PO BOX 110001		JUNEAU	AK	99811-0001	STATE OF ALASKA	X			
19	BOB	LOEFFLER	DNR DIV OF MINING LAND & WATER	550 7TH AVE STE 1070		ANCHORAGE	AK	99501	STATE OF ALASKA	X	X	X	
20	RICHARD	HUGHES	AK MINERALS COMMISSION	211 CUSHMAN ST		FAIRBANKS	AK	99701	STATE OF ALASKA	X			
21			COMMISSIONERS OFC DNR	400 WILLOUGHBY AVE 5TH FL		JUNEAU	AK	99801-1724	STATE OF ALASKA	X			
22			COMMISSIONERS OFC DNR	550 W 7TH AVE STE 1400		ANCHORAGE	AK	99501	STATE OF ALASKA	X			
BOROUGH & CITIES													
23			ALEUTIANS EAST BOROUGH	PO BOX 349		SAND POINT	AK	99661	BOROUGH/CITIES	X			
24			BRISTOL BAY BOROUGH	PO BOX 189		NAKNEK	AK	99633	BOROUGH/CITIES	X			
25			CITY AND BOROUGH OF JUNEAU	155 S SEWARD ST		JUNEAU	AK	99801	BOROUGH/CITIES	X			
26			CITY AND BOROUGH OF SITKA	100 LINCOLN ST		SITKA	AK	99835	BOROUGH/CITIES	X			
27	SKIP	RYMAN	CITY AND BOROUGH OF YAKUTAT	BOX 160		YAKUTAT	AK	99889	BOROUGH/CITIES	X		X	
28			DENALI BOROUGH	PO BOX 480		HEALY	AK	99743	BOROUGH/CITIES	X			
29			FAIRBANKS NORTH STAR BOROUGH	PO BOX 71267		FAIRBANKS	AK	99707	BOROUGH/CITIES	X			
30			HAINES BOROUGH	PO BOX 1049		HAINES	AK	99827	BOROUGH/CITIES	X			
31			KENAI PENINSULA BOROUGH	144 N BINKLEY ST		SOLDOTNA	AK	99669	BOROUGH/CITIES	X	X		
32			KETCHIKAN GATEWAY BOROUGH	344 FRONT ST		KETCHIKAN	AK	99901	BOROUGH/CITIES	X			
33			KODIAK ISLAND BOROUGH	710 MILL BAY RD		KODIAK	AK	99615	BOROUGH/CITIES	X			
34	MARRE	SMITH	LAKE PENINSULA BOROUGH	PO BOX 595		KING SALMON	AK	99613	BOROUGH/CITIES	X	X		
35			MUNICIPALITY OF ANCHORAGE	PO BOX 196650		ANCHORAGE	AK	99519-6650	BOROUGH/CITIES	X			
36			NORTH SLOPE BOROUGH	PO BOX 69		BARROW	AK	99723	BOROUGH/CITIES	X			
37			NW ARCTIC BOROUGH	PO BOX 1110		KOTZEBUE	AK	99752	BOROUGH/CITIES	X			
38			MATANUSKA SUSITNA BOROUGH	350 E DAHLIA AVE		PALMER	AK	99645	BOROUGH/CITIES	X			
39			CITY OF ADAK	PO BOX 2011		ADAK	AK	99546	BOROUGH/CITIES				
40			CITY OF AKHIOK	PO BOX 5050		AKHIOK	AK	99615	BOROUGH/CITIES				

First Name	Last Name	Suff.	Organization	Address1	Address2	City	ST	Zip	Group/Name	Received Maps	Requested Info or Maps	Submitted Comments	Undeliverable
151			CITY OF SAINT MICHAEL	PO BOX 59070		SAINT MICHAEL	AK	99659	BOROUGH/CITIES				
152			CITY OF SAINT PAUL	PO BOX 901		SAINT PAUL ISLAND	AK	99660	BOROUGH/CITIES				
153			CITY OF SAND POINT	PO BOX 249		SAND POINT	AK	99661	BOROUGH/CITIES				
154			CITY OF SAVOONGA	PO BOX 40		KETCHIKAN	AK	99769	BOROUGH/CITIES				
155			CITY OF SAXMAN	RT 2 BOX 1 SAXMAN		SCAMMON BAY	AK	99501	BOROUGH/CITIES				
156			CITY OF SCAMMON BAY	PO BOX 90		SCAMMON BAY	AK	99662	BOROUGH/CITIES				
157			CITY OF SELAWIK	PO BOX 98		SELAWIK	AK	99770	BOROUGH/CITIES				
158			CITY OF SELDOVIA	DRAWER B		SELDOVIA	AK	99663	BOROUGH/CITIES				
159			CITY OF SEWARD	PO BOX 167		SEWARD	AK	99664	BOROUGH/CITIES				
160			CITY OF SHAGELUK	PO BOX 110		SHAGELUK	AK	99665	BOROUGH/CITIES				
161			CITY OF SHAKTOOLIK	PO BOX 10		SHAKTOOLIK	AK	99771	BOROUGH/CITIES				
162			CITY OF SHISHMAREF	PO BOX 72083		SHISHMAREF	AK	99772	BOROUGH/CITIES				
163			CITY OF SHUNGNAK	PO BOX 59		SHUNGNAK	AK	99773	BOROUGH/CITIES				
164			CITY OF SKAGWAY	PO BOX 415		SKAGWAY	AK	99840	BOROUGH/CITIES				
165			CITY OF SOLDOTNA	177 N BIRCH ST		SOLDOTNA	AK	99671	BOROUGH/CITIES				
166			CITY OF STEBBINS	PO BOX 22		STEBBINS	AK	99671	BOROUGH/CITIES				
167			CITY OF TANANA	PO BOX 77249		TANANA	AK	99777	BOROUGH/CITIES				
168			CITY OF TELLER	PO BOX 548		TELLER	AK	99778	BOROUGH/CITIES				
169			CITY OF TENAKEE SPRINGS	PO BOX 52		TENAKEE SPRINGS	AK	99778	BOROUGH/CITIES				
170			CITY OF THORNE BAY	PO BOX 19110		THORNE BAY	AK	99819	BOROUGH/CITIES				
171			CITY OF TOGIAK	PO BOX 190		TOGIAK	AK	99678	BOROUGH/CITIES				
172			CITY OF TOOKSOK BAY	PO BOX 37008		TOOKSOK BAY	AK	99637	BOROUGH/CITIES				
173			CITY OF UNALAKLEET	PO BOX 28		UNALAKLEET	AK	99684	BOROUGH/CITIES				
174			CITY OF UNALASKA	PO BOX 610		UNALASKA	AK	99685	BOROUGH/CITIES				
175			CITY OF UPPER KALSKAG	PO BOX 80		UPPER KALSKAG	AK	99607	BOROUGH/CITIES				
176			CITY OF VALDEZ	PO BOX 307		VALDEZ	AK	99686	BOROUGH/CITIES				
177			CITY OF WAINWRIGHT	PO BOX 9		WAINWRIGHT	AK	99782	BOROUGH/CITIES				
178			CITY OF WALES	PO BOX 489		WALES	AK	99783	BOROUGH/CITIES				
179			CITY OF WASILLA	290 E HERNING AVE		WASILLA	AK	99654	BOROUGH/CITIES				
180			CITY OF WHITE MOUNTAIN	PO BOX 130		WHITE MOUNTAIN	AK	99784	BOROUGH/CITIES				
181			CITY OF WHITTIER	PO BOX 608		WHITTIER	AK	99693	BOROUGH/CITIES				
182			CITY OF WRANGELL	PO BOX 631		WRANGELL	AK	99829	BOROUGH/CITIES				
183			METLAKATLA INDIAN COMMUNITY	PO BOX 6		METLAKATLA	AK	99526	BOROUGH/CITIES				
NATIVE ORGANIZATIONS													
184			AHTNA INC	PO BOX 649	1230 AGVIK ST	GLENNALLEN	AK	99588-0649	ANCSA REGCORPS	X			
185			ARCTIC SLOPE REGIONAL CORP	PO BOX 129		BARROW	AK	99723-0129	ANCSA REGCORPS	X		X	
186			BERING STRAITS NATIVE CORP	PO BOX 1008		NOME	AK	99762-1008	ANCSA REGCORPS	X			
187			BRISTOL BAY NATIVE CORP	800 CORDOVA ST STE 200		ANCHORAGE	AK	99501-6299	ANCSA REGCORPS	X			
188	ATTN LAND DEPT		CAULISTA CORP	301 CALISTA COURT STE A		ANCHORAGE	AK	99518-3028	ANCSA REGCORPS	X			
189	ATTN LAND DEPT		COOK INLET REGION INC	PO BOX 93300		ANCHORAGE	AK	99509-3330	ANCSA REGCORPS	X			
190	ATTN LANDS AND NAT RES DEPT		DOTYON LTD	1 DOTYON PL STE 300		FAIRBANKS	AK	99701-2941	ANCSA REGCORPS	X			
191			NANA REGIONAL CORP INC	PO BOX 49		KOTZEBUE	AK	99752	ANCSA REGCORPS	X			
192	ATTN JEFF NELSON		NANA REGIONAL CORP INC	1001 E BENSON BLVD		KOTZEBUE	AK	99508	ANCSA REGCORPS	X			
193			SEALASKA CORP	ONE SEALASKA PLAZA STE 400		JUNEAU	AK	99801-1276	ANCSA REGCORPS	X			
194			ALEUT CORP	ONE ALEUT PLAZA	4000 OLD SEWARD HWY #300	ANCHORAGE	AK	99503-6079	ANCSA REGCORPS	X			
195			KONIAK INC	ANGLO ENERGY BLDG	4300 B ST STE 407	ANCHORAGE	AK	99503	ANCSA REGCORPS	X			
196			CHUGACH ALASKA CORP	560 E 34TH AVE STE 300		ANCHORAGE	AK	99503	ANCSA REGCORPS	X			
197			AFOGNAK NATIVE CORP	215 MISSION RD STE 212		KODIAK	AK	99615	ANCSA VILLAGE CORPS				
198			AHTNA INC	CHEESHA NA INC	PO BOX 649	GLENNALLEN	AK	99588-0649	ANCSA VILLAGE CORPS				
199			AHTNA INC	GAKONA CORP	PO BOX 649	GLENNALLEN	AK	99588-0649	ANCSA VILLAGE CORPS				
200			AHTNA INC	KLUTI KAAH CORP	PO BOX 649	GLENNALLEN	AK	99588-0649	ANCSA VILLAGE CORPS				

First Name	LastName	Suff.	Organization	Address1	Address2	City	ST	Zip	Group Name	Received Maps	Requested Info or Maps	Submitted Comments	Undeliverable
675	DEBORAH		AK OIL & GAS CONSERVATION COMM	333 W 7TH AVE STE 100		ANCHORAGE	AK	99501-3539	INDUSTRY	X			
676	ROSS		ALASKA ENERGY AUTHORITY	813 W NORTHERN LIGHTS BLVD		ANCHORAGE	AK	99503	INDUSTRY	X			
677	STEVEN	BORELL	ALASKA OIL & GAS ASSOC	121 W FIREWEED LN # 207		ANCHORAGE	AK	99503-2035	INDUSTRY	X			
678			ALASKA MINERS ASSOC	3305 ARCTIC BLVD STE 105		ANCHORAGE	AK	99503-4575	INDUSTRY	X	X		
679			RESOURCE DEVELOPMENT COUNCIL	121 W FIREWEED LN STE 250		ANCHORAGE	AK	99503-2035	INDUSTRY	X			
ENVIRONMENTAL GROUPS													
680	DEBORAH		AK CONSERVATION FOUNDATION	441 W 5TH AVE #402		ANCHORAGE	AK	99501-2340	ENVIROS	X			
681	COEN		AK FORUM FOR ENVIRO RESP	PO BOX 82718		FAIRBANKS	AK	99708	ENVIROS	X			
682	ROS		AK WILDERNESS CNCL	1589 SUNRISE DR		ANCHORAGE	AK	99504	ENVIROS	X	X		
683	RACHEL	JAMES	ALASKA COALITION	750 W 2ND AVE SUITE #205		ANCHORAGE	AK	99501	ENVIROS	X	X	X	
684	MELISSA	BLAIR	ALASKA COALITION	750 W SECOND AVE STE 205		ANCHORAGE	AK	99501	ENVIROS	X			
685			NATL WILDLIFE FEDERATION - ALASKA	750 W 2ND AVE #200		ANCHORAGE	AK	99501	ENVIROS	X			
686			SIERRA CLUB	333 WEST 4TH AVE STE 307		ANCHORAGE	AK	99501-2341	ENVIROS	X	X		
687	GLENN	ELISON	THE CONSERVATION FUND	6400 ANDOVER DR		ANCHORAGE	AK	99516	ENVIROS	X			
688			THE NATURE CONSERVANCY	715 L ST STE 100		ANCHORAGE	AK	99501	ENVIROS	X	X		
689			TRUSTEES FOR ALASKA	1026 W 4TH AVE STE 201		ANCHORAGE	AK	99501	ENVIROS	X			
690	ELEANOR	HUFFINES	WILDERNESS SOCIETY	430 W 7TH AVE STE 210		ANCHORAGE	AK	99501	ENVIROS	X			
691			AK ASSN FOR HISTORIC PRESERVATION	645 W THIRD AVE		ANCHORAGE	AK	99501-2124	ENVIROS				
692			AK NATURAL HERITAGE PROG	707 A ST		ANCHORAGE	AK	99501	ENVIROS				
693	JIM	ADAMS	AK QUIET RIGHTS COALITION	PO BOX 202592		ANCHORAGE	AK	99520	ENVIROS				
694			AK WILDERNESS RECREATION	2207 SPENARD RD # 201		ANCHORAGE	AK	99503	ENVIROS				
695	STEVE	WELLS	ALASKA NATURAL HISTORY ASSN	750 W 2ND AVE STE 100		ANCHORAGE	AK	99501	ENVIROS				
696			ALASKA WILDLIFE ALLIANCE	PO BOX 202022		ANCHORAGE	AK	99520	ENVIROS				
697			ARCTIC AUDUBON SCTY	BOX 82098		FAIRBANKS	AK	99708	ENVIROS				
698	PAMELA	MILLER	ARCTIC CONNECTIONS	519 W 8TH AVE STE 212		ANCHORAGE	AK	99510	ENVIROS		X		
699	RUTH	MCHENRY	COPPER COUNTRY ALLIANCE	HC80 BOX 306T		COPPER CENTER	AK	99573	ENVIROS		X	X	
700	IRIS	KORHONEN	EARTH JUSTICE	325 4TH AVE		JUNEAU	AK	99801	ENVIROS		X		
701			FRIENDS OF GLACIER BAY	PO BOX 135		GUSTAVUS	AK	99826	ENVIROS				
702	STANLEY	SENNER	NATIONAL AUDUBON SCTY	715 L ST STE 200		ANCHORAGE	AK	99501	ENVIROS				
703	CHIP	DENNERLEIN	NATL PARKS CONSERVATION	750 W 2ND AVE STE 205		ANCHORAGE	AK	99501	ENVIROS				
704			NORTHERN AK ENVIRON CNTR	830 COLLEGE RD		FAIRBANKS	AK	99701-1535	ENVIROS		X		
705			SE ALASKA CONSERVATION COUNCIL	419 6TH ST #328		JUNEAU	AK	99801	ENVIROS				
706	GABRIELLE	BARNETT	TURNAGAIN ARM CONSERV LEAGUE	PO BOX 662		GIRDWOOD	AK	99587	ENVIROS				
707			YUKON RIVER INTERTRIBAL WATERSHED COUNCIL	136 DUNKEL ST #2		FAIRBANKS	AK	99701	ENVIROS				
INQUIRIES & COMMENTS GENERATED BY DIRECT MAILING													
INQUIRIES & COMMENTS GENERATED BY ADS & MEDIA													
TOTAL													
										84	102	10	17
											23	8	
											79	2	

Public Comments

Pages 60-114

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE COMMISSIONER

FRANK H. MURKOWSKI, GOVERNOR

550 WEST 7TH AVENUE, SUITE 1400
ANCHORAGE, ALASKA 99501-3650

PHONE: (907) 269-8431

FAX: (907) 269-8918

September 14, 2005

Henri Bisson
Alaska State Director
Bureau of Land Management
Attn: Section 207 Congressional Report (AK0932)
222 West Seventh Ave., #13
Anchorage, AK 99513-7599

Dear Mr. Bisson;

The State of Alaska appreciates the opportunity to offer comments and suggestions relative to the Public Land Orders (PLOs) that withdrew millions of acres of Federal land in Alaska for study and classification purposes. The State is pleased to see BLM taking steps to evaluate the need for continued withdrawals particularly if the purpose for which they were established has been fulfilled.

Furthermore, during the scoping process for the various RMPs currently being developed for large regions of BLM managed lands within the State of Alaska, the State has consistently requested that BLM review all existing withdrawals and evaluate the purpose for which they were created relative to current needs. The current planning process provides BLM with an excellent opportunity for study and classification of these lands as envisioned in the (d)(1) Public Land Orders. Appropriate land management strategies designed to protect the resource values of lands retained in long-term BLM management can be developed with public and other agency input through the RMP process. The State is pleased to see BLM planning teams conducting reviews of existing withdrawals within the scope of these RMPs. In general the State is pleased with the planning teams' efforts and the results of these reviews, although there are instances in which the State will disagree with BLM's decision to retain some withdrawals. We suggest that appropriate management strategies or program specific withdrawals should replace existing (d)(1) withdrawals so that the appropriate management tools are used to manage BLM resources.

We appreciate that the RMP process has provided, and BLM has taken advantage of, the opportunity for study and classification of the withdrawn lands as envisioned in the (d)(1) withdrawals, thereby eliminating the need for continued (d)(1) withdrawals. The (d)(1) withdrawals unnecessarily complicate land management by placing duplicative broad restrictions on large tracts of land. The development and implementation of site-specific land management strategies is preferable to simplify land status and management and provide clear location specific direction to managers and the public. The following comments and more specific information and priorities may assist BLM in addressing those withdrawals that are not being addressed within a current RMP planning area.

General Comments:

PLOs 5169 through 5178 were all made to provide for ANCSA Village and Regional Deficiency selections. These selections are all in place and no new selections can be filed. Therefore, all of these PLOs should be revoked. These withdrawals are scattered geographically throughout the state and have no relationship to any meaningful contemporary land management strategies.

PLO 5179 was an 80 million acre withdrawal for ANCSA (d)(2) which was settled by ANILCA. Congress has already determined the fate of the lands affected by this withdrawal. If Congress has already acted by designating a conservation system unit (CSU) such as a national park or national wildlife refuge, the remaining withdrawal is meaningless and should be lifted to clarify federal land records. If Congress did not establish the withdrawn area as a CSU, then Congress already made the decision that the land should not be permanently withdrawn and the withdrawal should be revoked. In the event that BLM does not recommend revocation of PLO 5179 in its entirety, in our specific comment section of this letter the state has identified areas within National Wildlife Refuges where we request this withdrawal be revoked.

"Develop, Conserve, and Enhance Natural Resources for Present and Future Alaskans."

PLO 5180 withdrew 47 million acres, some of which overlaps with PLO 5150, a more restrictive withdrawal. Where 5150 overlaps PLO 5180, there is no need to keep PLO 5180. Other portions overlap areas that Congress placed in CSUs through ANILCA, therefore, as was the case with PLO 5179, these withdrawals are no longer relevant and should be revoked. If areas withdrawn under PLO 5180 were not put into CSUs and do not overlap PLO 5150, they should be revoked because as stated previously, Congress has already acted not to permanently withdraw these areas. In addition, the development of Resource Management Plans (RMPs) should provide BLM with sufficient opportunity to ascertain the resource values of lands that need protection and involve the public in the development of appropriate classification and management strategies.

PLO 5181 appears to overlap areas set aside as national wildlife refuges. Congress has already acted upon these areas making the withdrawals no longer necessary.

PLO 5184 contains very scattered, isolated tracts withdrawn for ANCSA villages and should be revoked for the same reasons described for PLOs 5169-5178 above.

Portions of **PLO 5186** conflict with many state selections, and the PLO does not appear to preclude conveyance to the state. Congress set aside other portions of PLO 5186 as ANWR. Again, since Congress has already acted on these lands, the withdrawals should be revoked.

While both PLO 5180 and 5186 provided for location for metalliferous minerals and are not as restrictive as other withdrawals the orders themselves create an unnecessary layer of management that should be removed to clarify federal land records.

Specific Comments and Prioritization Requests:

The state prefers that the Department of Interior revoke all (d)(1) withdrawals that overlap with areas that are designated as CSUs because Congress, through ANILCA, has determined how these lands will be managed. If the Department of Interior is not willing to revoke these PLOs in their entirety, we request that where (d)(1) withdrawals overlap non-Wilderness national wildlife refuges with oil and gas development potential, that the (d)(1) withdrawals in these areas be lifted.. ANILCA and other federal laws specifically provide a process for possible oil and gas exploration and development on non Wilderness Refuge lands. Refuge comprehensive conservation plans would need to separately authorize oil and gas development in these areas, but there is nothing in ANILCA that precludes such development. Hence, these Public Land Orders could prohibit uses of the refuges that are not prohibited under ANILCA. This situation does not apply to designated refuge Wilderness areas nor to national parks since they are already statutorily closed to oil and gas development with the exception of valid existing rights.

The Alaska Peninsula and in the Yukon Flats refuges are a higher priority for revocation of (d)(1) withdrawals due to higher potential for oil and gas development. We realize of course that removal of the (d)(1) does not mean that oil and gas development would necessarily be proposed or would be appropriate in these refuges.

Please consider the following for revocation of withdrawals:

(Map 1, attached)

Alaska Maritime Refuge. BLM's (d)(1) withdrawal map appears to indicate a series of very small withdrawals along the coast near Cape Thompson, south of Point Hope, that are either in or near two large potential oil and gas basins.

Alaska Peninsula Refuge. Several stair-step corners of the northwestern edge of this refuge extend into the oil and gas basin that lies on the north side of the Alaska Peninsula and extends out into Bristol Bay. The state has scheduled an oil and gas lease sale on adjacent state lands for October 2005.

(Map 3, attached)

Koyukuk Refuge. The southwest portion of the refuge, south of the designated wilderness area, overlaps a potential oil and gas basin.

Selawik Refuge. Outside designated Wilderness, over half of the refuge to the north and west overlaps a potential oil and gas basin.

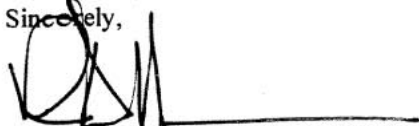
(Map 4, attached)

Kanuti Refuge. The eastern half of this refuge overlaps a potential oil and gas basin.

Yukon Flats Refuge. A substantial portion of this large refuge overlaps a potential oil and gas basin. In light of the possible land exchange between the refuge and Doyon, we request the corresponding d-1 withdrawals between the O&G basin and the southern boundary of the refuge also be lifted.

Thank you for the opportunity to offer comments on the ANCSA Section 17(d)(1) Public Land Orders. We appreciate BLM's efforts to address this issue. Should you have any questions, please don't hesitate to contact me at your earliest convenience.

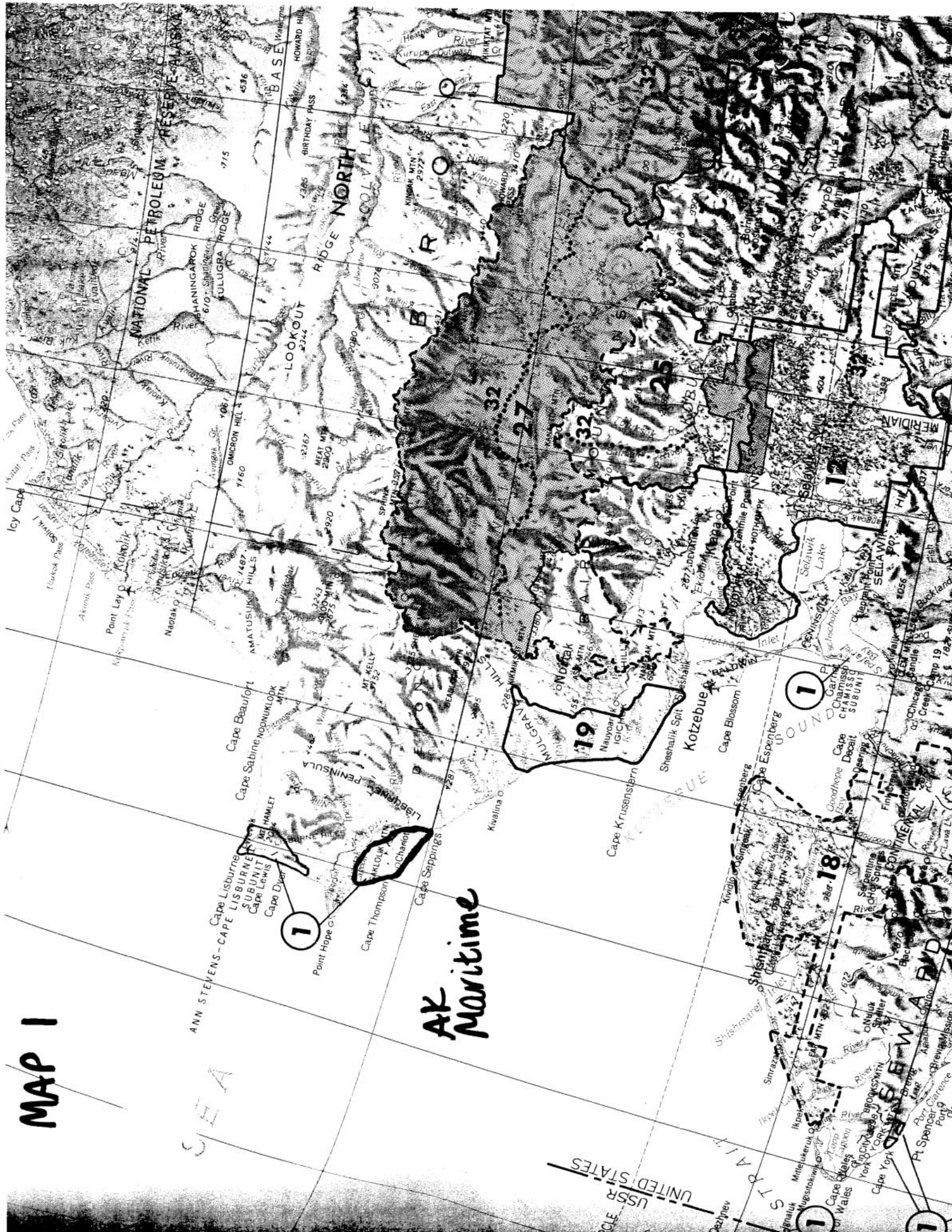
Sincerely,

A handwritten signature in black ink, appearing to read 'Richard LeFebvre', with a long horizontal line extending to the right.

Richard LeFebvre
Deputy Commissioner

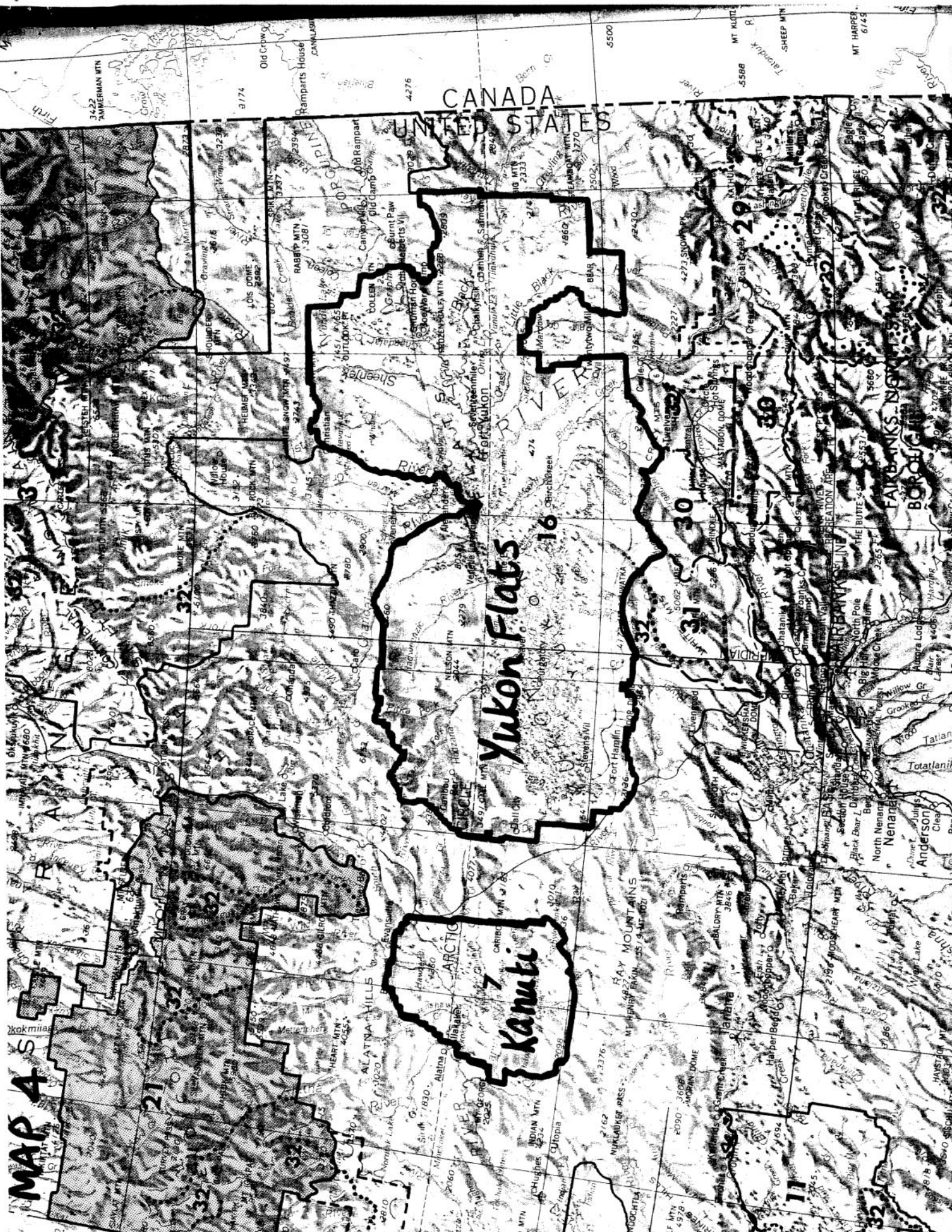
Attachments: Maps 1, 3, and 4.

AK Maritime





MAP 4 S



CANADA
UNITED STATES

Yukon Flats

ARCHIC
Kanut

FAIRBANKS-NORTH
STAR MOUNTAINS

FAIRBANKS-BOROGUCH
MOUNTAINS



United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Rd.

Anchorage, Alaska 99503-6199

IN REPLY REFER TO:

RE/6169.SJ

SEP 14 2005

Memorandum

To: State Director - Bureau of Land Management

From: *Acts* Regional Director - Region 7 *John Edwards*

Subject: Report to Congress Regarding Revocation of Section 17(d)(1) Withdrawals

Your memorandum of June 5, 2005, provides information regarding a report to Congress that the Bureau of Land Management is preparing in accordance with direction provided in the Alaska Land Transfer Acceleration Act of December 10, 2004. The report concerns the review and revocation of withdrawals made pursuant to Section 17(d)(1) of the Alaska Native Claims Settlement Act. Maps of areas affected by the various (d)(1) withdrawals were furnished and an opportunity to comment has been provided.

Your memorandum states that BLM will make recommendations for public lands managed by the BLM **and** that BLM is responsible for preparing the overall report, however, it is unclear as to what information goes into the overall report in regards to Conservation System Units managed by other agencies.

We agree that certain provisions of the Alaska National Interests Lands Conservation Act close Alaskan Units of the National Wildlife Refuge System to operation of public land laws and the Mining Law of 1872 as amended, therefore, consideration of opening these areas by revocation of the (d)(1) withdrawals is moot.

We are concerned, however, with any proposed revocation of the (d)(1) withdrawals on Conservation System Units until final adjudication and conveyance of all Regional selections under Section 14(h)(1) of ANCSA has been completed. We have recently completed an inventory of Section 14(h)(1) applications filed on Refuge System Lands. This inventory found that there are approximately 1,213 pending 14(h)(1) selections, of which 537 selections comprising 33,184 acres, are located within (d)(1) withdrawal areas. A breakdown of these applications by refuge and other related information is attached for your information.

The BLM has not completed adjudication of the validity of these 537 applications as to whether they were filed on available land that was unappropriated and unreserved at the time of filing, consistent with the statutory selection criteria for selections filed under Section 14(h) of ANCSA. Therefore, we believe the (d)(1) withdrawals on Conservation System Units should not be

revoked until this adjudication takes place. Retaining the status quo of (d)(1) withdrawals and notation of the public land records will facilitate this adjudication. We understand from BLM staff that the goal established by the Alaska Land Transfer Acceleration Act is to sunset the ANCSA conveyance program by 2009.

Thank you for the opportunity to provide comments on the draft report to congress on (d)(1) withdrawals. As Conservation System Unit managers, we would like the opportunity to review the report when it is forwarded. For additional information on the inventory provided, contact John G. Brewer, Chief, Branch of Mapping Sciences, Division of Realty, at 786-3462.

Attachment

Region 7 14(h)1 Summary

Refuge	Total # of 14(h)1	Total # w/i D1 Area	Total acres w/i D1 Area
AK Maritime	304	31	20401.2
AK Peninsula	18	16	1194.75
Arctic	30	5	815.18
Becharof	21	21	365.37
Innoko	0	0	0
Izembek	13	0	0
Kanuti	1	1	1591.01
Kenai	6	0	0
Kodiak	6	0	0
Koyukuk	0	0	0
Nowitna	2	2	178.5
Selawik	6	6	2.71
Tetlin	1	1	236.08
Togiak	44	25	303.08
Yukon Delta	760	428	8060.07
Yukon Flats	1	1	36
Total	1213	537	33183.95

Region 7 14(h)1 Summary

Refuge	Total # of 14(h)1 listed on SO 3220	Total # w/ D1 Area
AK Maritime	20	3
AK Peninsula	0	0
Arctic	13	11
Becharof	0	0
Innoko	2	2
Izembek	0	0
Kanuti	1	1
Kenai	3	0
Kodiak	2	1
Koyukuk	1	1
Nowitna	1	1
Selawik	1	1
Tetlin	2	2
Togiak	6	6
Yukon Delta	35	29
Yukon Flats	0	0
Total	87	58



United States
Department of
Agriculture

Forest
Service

Alaska Region

P.O. Box 21628
Juneau, AK 99802-1628

File Code: 2760

Date:

SEP 07 2005

SD: _____

ASD: _____

930

Dore Muelovic

Mr. Henri Bisson
Alaska State Director
Bureau of Land Management
Alaska State Office
222 West Seventh Avenue, #13
Anchorage, AK 99513-7599

Dear Mr. Bisson:

This is in response to your June 15 letter requesting comments regarding opening certain Public Land Orders (PLOs) that withdrew millions of acres of Federal land in Alaska for study and classification purposes. The PLOs under review are a series of orders issued under the authority of Section 17(d)(1) of the Alaska Native Claims Settlement Act and are referred to as d-1 withdrawals. Our following comments are based on comparison of the d-1 withdrawal areas to the management intent for these areas as outlined in the Tongass National Forest Land Management Plan (TLMP) and the Chugach National Forest Revised Land and Resource Management Plan (Forest Plan).

Tongass National Forest

We find that the d-1 withdrawals can be removed from most areas of the Tongass National Forest, with two exceptions. We recommend that the PLO 5186 withdrawal remain in effect on lands north and south of Skagway within the Warm Pass Research Natural Area (RNA) and within that portion of the Katzehein River corridor that is recommended for designation as a Wild River by the Forest Plan (Tongass Land Mangement Plan (TLMP)).

Portions of the Warm Pass RNA are included in the PLO 5186 withdrawal and are therefore, at present, closed to mineral entry. If the withdrawal were lifted, these lands would become available for mineral entry and development; this might be incompatible with the RNA management objectives. Therefore, we recommend that the withdrawal not be lifted for this area. Specifically, we request that the withdrawal be retained for T. 26 S., R. 60 E, CRM and also for T. 27 S., R. 60 E, CRM.

The other area of concern is the Katzehein River. The upper nine miles of this river are recommended for Wild River designation in TLMP. We recommend that the withdrawal be retained on the lands within the Katzehein corridor. Specifically, we request that the withdrawal be retained for these townships: T. 30 S., R. 60 E., CRM and T. 31 S., R. 60 E., CRM. The withdrawal may be lifted on the other lands in the vicinity of the Katzehein.

Chugach National Forest

Forest Plan management direction for areas added by ANILCA Section 501(a) indicates that maintaining the status quo of the lands is appropriate and desirable (Nellie Juan, College Fjord, Copper/Rude River, and Controller Bay). The management direction for these areas is primarily



to maintain and protect the natural character of the areas, allowing natural processes to continue with minimum human intervention. Retaining the withdrawal in the Nellie Juan, College Fjord, and Controller Bay areas would facilitate implementing this direction. Section 502 of ANILCA specifically withdraws the Copper River addition, so the d-1 withdrawal could be relinquished for that addition (the Controller Bay Addition does not appear to be included in the ANILCA 502 withdrawal).

Within the ANILCA Section 501(a) lands, the areas we request the d-1 withdrawal be retained are described in the Forest Plan as Management Area Prescriptions and are named and mapped as:

1. Proposed Research Natural Area (141), specifically the Nellie Juan RNA in T. 4 N., R. 3 E., Seward Meridian.
2. Wild River Management Area (132), specifically the lower Nellie Juan River in T. 4 N., R. 4 E., Seward Meridian.
3. Nellie Juan-College Fjord Wilderness Study Area (131), specifically those areas included in the d-1 withdrawals that overlap with two of the areas added to the Chugach National Forest in the Alaska National Interest Land Conservation Act (ANILCA), Section 501(a)(1). These areas are Nellie Juan and College Fjord.
4. Controller Bay (135), part of the 501(b)-1 Management Area.

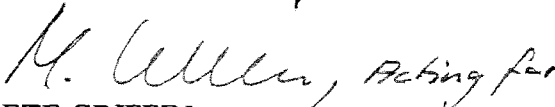
Outside of the ANILCA Section 501(a) lands, we also request retaining the d-1 withdrawals for the Portage Area and the Lost Lake Area. Part of the Portage Area and all of the Lost Lake Area are in the Backcountry Prescription (210) with management direction to limit, as much as possible, direct human influence on ecological processes. These areas provide opportunities for solitude and isolation and are managed to enhance and protect the character of the area for future generations. The Portage Area also has portions in the Scenic River Management Area (231), with direction to maintain its outstandingly remarkable values and classification eligibility for Scenic River designation. Retaining the withdrawals will facilitate meeting this management direction.

We request these d-1 withdrawals remain in effect until we can complete the process through the BLM to have these areas formally withdrawn from entry under the public land laws, including the general mining laws.

If in the future you need maps showing locations of the areas we have identified, please contact Jackie Swanson at (907) 586-7870.

Thank you for the opportunity to provide these comments.

Sincerely,


PETE GRIFFIN
Acting Director, Recreation, Lands & Minerals

cc: Andrew J Schmidt, Barbara Stanley



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

SD: _____

ASD: _____

IN REPLY REFER TO:

L14 (AKRO-L)

930

SEP 14 2005

Memorandum

To: Alaska State Director, Bureau of Land Management

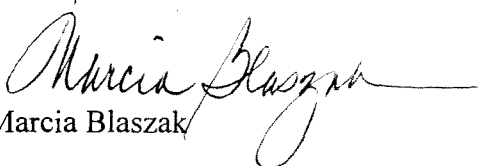
From: Regional Director, Alaska Region

Subject: Section 17 (d)(1) Withdrawal Study

It is the understanding of the National Park Service (NPS) that revocation of land withdrawals made pursuant to Section d(1) of the Alaska Native Claims Settlement Act of 1971 (ANCSA) will have no effect upon land ownership or management within units of the National Park System in Alaska. This matter has been discussed with Bureau of Land Management (BLM) staff working on the study of the possible revocations, and with BLM withdrawal staff, and there is general agreement that such revocation will have no effect on NPS units, and specifically that there would be no effect on any land selections made under Section 14(h) of ANCSA. However, it was recommended that the BLM conveyance staff review the 14(h) selections in relation to the d(1) withdrawals to confirm that revocation of the d(1) withdrawals will have no effect on conveyance of any 14(h) selections.

If the above-mentioned review is performed before the report is finalized, and it is confirmed that revocation of the d(1) withdrawals will have no effect on conveyance of any 14(h) selections within NPS units, the NPS has no objection to the revocation of the d(1) withdrawals in or around NPS units in Alaska. If, on the contrary, the revocations would allow the conveyance of 14(h) selections in NPS units that would not otherwise be conveyed, the NPS opposes the revocation of the d(1) withdrawals.

Thank you for the opportunity to comment. If you have any questions, please contact Charles Gilbert, Chief of our Lands office, at 907-644-3426.


Marcia Blaszk

THE
DOE RUN
COMPANY
SOUTHEAST MISSOURI
MINING AND MILLING DIVISION
VIBURNUM, MO 65566
TELEPHONE 573-244-8622
FAX 573-244-8624

September 14, 2005

Bureau of Land Management
Alaska State Office
Attn: Section 207 Congressional Report (AK-932)
222 W. 7th Ave., #13
Anchorage, Alaska 99513-7599

We appreciate the opportunity to comment on the lands that have been withdrawn by a series of Public Land Orders by the Secretary of the Interior under the authority of Section 17 (d)(1) of the Alaska Native Claims Settlement Act. Comments have been requested on which withdrawn lands may be opened up to entry and disposal under the public land laws. The Bureau of Land Management is preparing a report for the Secretary of the Interior to submit to Congress in accordance with Section 207 of the Alaska Land Transfer Acceleration Act to identify the withdrawn lands that will be opened to entry.

The Secretary issued 15 Public Land Orders that impacted all areas of the State. The Statewide maps provided by the BLM divided the State into 12 geographic areas. All of these 12 areas are significantly affected by the PLOs. The decision on what lands will be part of the Native corporations land base, which will become land segregated from appropriation under the public land laws by selection of the State of Alaska, needs to be completed. It is incumbent on the BLM and Secretary of the Interior to release as much land as possible from segregation after many years of administration under the withdrawal by the Public Land Orders.

All lands outside of the conservation areas should be released, as part of the Report to Congress required is Section 207 of the Alaska Land Transfer Acceleration Act. These lands have been reviewed by the State and Native Corporations and were not selected by either as lands to be removed from segregation of the public land laws. These non-selected lands should all be opened to entry.

Some parts of the Conservation Areas within the State do allow the location of metalliferous minerals under Public Land Order 5180. However, the vast majority of PLOs issued in the Conservation Areas allow no entry, and none allow energy production. It is our view that things have changed since the issuance of the Public Land Orders and that all orders should be reviewed to be consistent with current public needs. This is particularly true with oil, gas and mineral production. We recommend that the Public land Orders for all 12 areas be reviewed for the need to continue the Orders or to a need to modify the Orders. It does appear that the Orders have served their purpose and could be discontinued. We appreciate the opportunity to comment.

Sincerely,


Don Taylor
Vice President Exploration

**Alaska Coalition ~ Deborah Lee Williams and Associates ~ Earthworks
Alaska Conservation Voters ~ Alaska Conservation Alliance ~ Sierra Club
Campaign for America's Wilderness ~ Natural Resources Defense Council
Northern Alaska Environmental Center ~ The Wilderness Society**

September 15, 2005

Dave Mushovic
Bureau of Land Management - Alaska State Office
Attn: Section 207 Congressional Report (AK-932)
222 West Seventh Avenue, #13
Anchorage, Alaska 99513-7599

Dear Mr. Mushovic:

Thank you for the opportunity to comment on the BLM's report to review the ANCSA § 17(d)(1) withdrawals pursuant to section 207 of the Alaska Land Transfer Acceleration Act (ALTAA). On behalf of the Alaska Coalition, Alaska Conservation Alliance, Alaska Conservation Voters, Campaign for America's Wilderness, Deborah Lee Williams and Associates, Earthworks – Mineral Policy Center, Natural Resources Defense Council, Northern Alaska Environmental Center, Sierra Club, and The Wilderness Society we would like to submit the following comments and included maps for consideration.

In summary, we strongly oppose lifting the Public Land Order's (PLO's) from BLM, National Park Service, U.S. Fish and Wildlife Service and U.S. Forest Service lands. Thus, we suggest that BLM recommend Congress take no action on the (d)(1) report that would lift the Public Land Orders (PLOs) on any federal lands in Alaska. We believe that the appropriate procedure for reviewing the (d)(1) withdrawals on BLM-managed lands is through the Resource Management Planning process. We also believe that BLM should refrain from making recommendations regarding withdrawals on lands under National Park Service, U.S. Forest Service, or U.S. Fish and Wildlife Service jurisdictions. We believe the (d)(1) withdrawals should be left in place on these

agencies' lands and, in any event, we believe the proper time to review the (d)(1) withdrawals on these lands is in the context of the agencies' regular planning processes.

Legislative History

In Section § 17(d)(1) of the Alaska Native Claims Settlement Act (ANCSA), Congress withdrew millions of acres of unreserved public lands from "all forms of appropriation under the public land laws, including mining (except locations for metalliferous minerals) and the mineral leasing laws" for a period of 90 days. 43 U.S.C. § 1616(d)(1). Congress ordered the Secretary of Interior to "review the public lands in Alaska and determine whether any portion of these lands should be withdrawn . . . to insure that the public interest in these lands is properly protected." *Id.* Congress also provided that any further withdrawal after the 90-day period would be pursuant to the Secretary's existing authority, and authorized the Secretary to classify or reclassify such withdrawn lands and to open lands to appropriation according to these classifications. *Id.*

Following the passage of ANCSA, the Interior Secretary issued a series of public land orders (PLOs) that withdrew from appropriation millions of acres of public lands managed by BLM. *See* BLM Public Notice, June 15, 2005. In the Alaska National Interest Lands Conservation Act (ANILCA), Congress subsequently included some of these lands in "conservation system units" (CSUs). Many others have never been reviewed or classified as mandated by ANCSA § 17(d)(1).

In 2004, Congress passed ALTAA, which required, among other provisions, that BLM review the withdrawals made pursuant to ANCSA § 17(d)(1) to "determine if any portion of the lands withdrawn pursuant to that provision can be opened to appropriation under the public land laws or if their withdrawal is still needed to protect the public interest in those lands." ALTAA, P.L. 108-452, § 207(1), 118 Stat. 3575, 3585-86 (2004). ALTAA further required BLM to submit to Congress a report that "identifies any portion of the lands so withdrawn that can be opened to appropriation under the public land laws consistent with the protection of the public interest in these lands." ALTAA § 207(3).

We believe that the regular planning processes of Federal land-management agencies are more appropriate venues for reviewing the (d)(1) withdrawals and making appropriate classifications of these vast acreages of lands. Thus, we urge BLM to recommend to Congress that it take no action on the report at this time, but instead allow the (d)(1) withdrawal issues to be resolved in the course of the agencies' regular, legally required planning processes.

Federal Agencies Should Conduct the d-1 Reviews Pursuant to Their Land-Use Management Planning Processes

BLM manages nearly 87 million acres of land in Alaska. It also manages 245 million acres of subsurface mineral estate underlying Federal surface land in Alaska. In the Federal Land Policy and Management Act (FLPMA), Congress directed that BLM "shall, with public involvement and consistent with the terms and conditions of this Act, develop, maintain, and, when appropriate, revise land use plans which provide by tracts or areas for the use of the public lands." 43 U.S.C. § 1712(a). In the policy section of FLPMA, Congress declared that "the national interest will be best realized if the public lands and their resources are periodically and systematically inventoried and their present and future use is projected through a land use planning process coordinated with other Federal and State planning efforts." 43 U.S.C. § 1701(a)(2). FLPMA also requires BLM to provide opportunity for public participation in this planning process. 43 U.S.C. § 1701(a)(5).

The U.S. Fish and Wildlife Service, U.S. Forest Service and National Park Service have similar planning responsibilities, each of which provides for public participation in the process.

ANILCA requires the Fish and Wildlife Service to prepare, and from time to time revise, a comprehensive conservation plan (CCP) for each National Wildlife Refuge in Alaska. ANILCA § 304(g)(1). Among other requirements, the Fish and Wildlife Service must designate areas within each refuge according to their respective resources and values and specify the uses within each such area that may be compatible with the major purposes of the refuge. ANILCA § 304(g)(3)(A). In preparing each CCP, the agency

must publish a notice in the Federal Register, hold public hearings, and provide opportunities for public comment. ANILCA § 304(g)(4)-(5).

In the National Forest Management Act, 16 U.S.C. § 1600 *et seq.*, Congress required the U.S. Forest Service to develop, maintain, and, as appropriate, revise land and resource management plans for units of the National Forest System at least every 15 years. 16 U.S.C. § 1604. The Forest Service must provide for public participation in the development, review, and revision of its land management plans. 16 U.S.C. § 1604(d).

For each unit of the National Park System, Congress mandated that the Park Service prepare and regularly revise management plans that include, *inter alia*, measures for the preservation of resources and indications of the types and general intensities of development. 16 U.S.C. § 1a-7. Park Service internal management policies require the agency to review, revise, or amend every 10 to 15 years its management plans for each unit of each National Park in Alaska. NPS Management Policies, ch. 2. The agency considers these reviews major federal actions that trigger the mandates of the National Environmental Policy Act (NEPA), which requires it to prepare environmental impact statements (EIS) and allow public participation in the process.

BLM Resource Management Planning Processes

BLM is currently revising its Resource Management Plans (RMPs) for many of the lands and mineral estates it administers in Alaska. It is in the process of preparing draft or final environmental impact statements for four such RMPs. These RMPs address the long-term management strategies for BLM-managed lands throughout the state, which include: East Alaska, about 7.1 million acres; Ring of Fire, about 1.3 million acres; Kobuk-Seward Peninsula, 13 million acres; and Bay Area, 3.6 million acres in the Bristol Bay and Goodnews Bay areas.

The draft East Alaska RMP, released for public review in April 2005, addressed the lifting of (d)(1) withdrawals. Alternative D, the “preferred alternative” proposed lifting the (d)(1) withdrawals on over 6 million acres of the 7.1 million-acre planning area. This constitutes a 78 percent increase in the amount of land open to locatable mineral entry. BLM also proposed to open 79 percent of the lands to oil and gas leasing.

In all, BLM statewide RMP revisions may open millions of acres to resource extraction and may significantly impact wildlife habitat, recreational uses of the lands, and subsistence resources. Therefore, BLM is proceeding under its mandates pursuant to FLPMA and NEPA by preparing environmental impact statements and allowing for participation and comment by interested parties.

Federal land-use planning processes are designed to provide for meaningful reviews and impact analyses of multiple land uses, utilize each agency's expertise in managing a broad spectrum of lands and resources, and allow for public participation. This comprehensive approach incorporates rational decisionmaking and provides the public an opportunity to actively participate in an agency's land-use planning, thereby assisting the agencies to consider the interests of all users of the public lands in Alaska. Given that all the aforementioned Federal agencies conduct their land management planning by geographic region or specific CSU, these planning processes are the appropriate forum for considering whether the (d)(1) withdrawals that still exist within these regions or CSUs are still warranted.

BLM Provided Inadequate Public Process for (d)(1) Report

Although BLM provided the public an opportunity to comment generally on the (d)(1) review, this comment period is limited to commenting in the abstract before the agency issues its draft report and recommendations. Thus, in the (d)(1) review, BLM provided less meaningful opportunities for public participation than are provided in the RMP process. Yet public involvement in this report is critical given that the report could lead to dramatic land management decisions regarding mineral resource management. Moreover, BLM is making these decisions without the analytical benefits of the NEPA process. Lifting the (d)(1) withdrawals, which would greatly increase exploration and development of leasable and locatable minerals in the affected areas, may destroy important wildlife habitat, despoil pristine areas, eliminate recreation opportunities, and dramatically restrict or alter subsistence uses and resources.

For these reasons, Congress should allow the BLM, Fish and Wildlife Service, Forest Service, and National Park Service to review the status of the (d)(1) withdrawals on their respective lands, with opportunities for public comment, as part of their normal

planning processes. We believe the (d)(1) withdrawals should be left in place on many of these lands and, in any event, we believe the proper time to review the (d)(1) withdrawals on these lands is in the context of the agencies' regular planning processes. We strongly believe that BLM should recommend that Congress take no action on the (d)(1) withdrawals.

A Legislative EIS May Be Required

BLM should prepare an EIS for the report on (d)(1) lands, as NEPA requires. Federal agencies must include an EIS "in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment." 42 U.S.C. § 4332(2)(C). In the NEPA context, Council on Environmental Quality (CEQ) regulations define environmental effects as:

- (a) Direct effects, which are caused by the action and occur at the same time and place.
- (b) Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonable foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

40 CFR § 1508.8. The CEQ regulations also define legislation as "a bill or legislative proposal to Congress developed by or with the significant cooperation and support of a Federal agency." 40 CFR § 1508.17. The test for significant cooperation is whether the proposal is predominantly that of the agency rather than another source. *Id.*

In this instance, BLM is predominantly responsible for the d-1 report to Congress and the accompanying recommendations. Moreover, the agency's recommendations regarding whether Congress should lift the (d)(1) withdrawals may significantly affect the quality of the human environment by inducing land-use changes in the affected areas. If Congress lifts most or all of the (d)(1) withdrawals as a result of BLM's recommendations, millions of acres of public lands would be opened to exploration and development of leasable and locatable minerals. This action may have serious environmental consequences. Thus, NEPA requires BLM to prepare an EIS before submitting the (d)(1) recommendations to Congress. *See, e.g., Trustees for Alaska v. Hodel*, 806 F.2d 1378, 1381 (9th Cir. 1986) (holding that Department of Interior report

mandated by Congress constituted “proposal for legislation” requiring EIS because it contained specific recommendations on future land use, i.e., whether to allow further oil and gas development in Arctic Refuge coastal plain or designate it for wilderness preservation).

Analysis of (d)(1) withdrawals in BLM Conservation System Units

We request that BLM carefully review the protective authority that the following PLOs have upon the governing authority of the BLM Conservation System Units (CSUs) within which the PLOs exist. Primarily, BLM should examine the consequences of lifting the (d)(1) withdrawals in CSUs.

CSU	Map Areas	PLO's
Beaver Creek Wild & Scenic River	2	5179, 5180
Birch Creek Wild & Scenic River	2	5179, 5180
Delta Wild & Scenic River	1,2	5174, 5178, 5180, 5184
Fortymile Wild & Scenic	2	5173, 5180, 5184
Gulkana Wild & Scenic River	1,2,8	5178, 5180, 5184, 5186
Steese National Conservation Area	2,3	5180
Unalakleet Wild River	5,6,9	5173, 5179, 5180, 5184
White Mountains National Recreation Area	2	5173, 5184

We request that BLM withdraw all portions of all designated and eligible Wild & Scenic Rivers in Alaska from locatable and leasable mineral entry. Similarly, the agency should withdraw and all lands within Steese National Conservation Area and White Mountains National Recreation Area from mineral development. If preserving the (d)(1) withdrawals is not an appropriate method of permanently withdrawing these CSUs from locatable or leasable mineral entry, we request that BLM adopt appropriate withdrawals.

Current demands of multiple user groups on public resources threaten to overwhelm BLM Alaska’s management workload. The impacts of off-highway vehicles on backcountry lands and streams, the demands of the tourism and recreation industries, and the needs for access and protection for subsistence resources are just a few of the myriad challenges BLM faces. Should Congress lift the (d)(1) withdrawals within CSUs or any of the BLM planning regions, the agency would be deluged with the additional pressures of managing commercial leasable or locatable mineral development activities in pristine areas.

For example, should Congress lift the (d)(1) withdrawals, BLM would receive a flood of applications for mineral exploration, development, and other mining activities across millions of acres of federally managed lands. We are concerned that BLM Alaska may not have adequate financial support and staff, including resource specialists, permit administrators, and law enforcement, to handle the additional workload that would accompany such a significant change in mineral management policy. Thus, Congress should not lift the (d)(1) withdrawals until it provides BLM additional permanent funding and personnel resources.

Also, BLM should analyze the long-term potential economic benefits of lifting (d)(1) withdrawals on BLM lands and include its finding in its report to Congress. Representatives of the mining, oil, and gas industries, and BLM staff, have indicated that there is little commercial interest in the leasable and locatable mineral potential of most unencumbered BLM lands. It is widely accepted that the State of Alaska and Native Corporations already have selected most of the Federal land with leasable and locatable mineral potential. These interests consider unencumbered BLM lands to be of only *marginal* mineral value. Thus, we are concerned about the integrity of any entity that would be interested in pursuing exploration and development activities on such marginal-value lands. We also are concerned about the environmental impacts of mining activities on these lands, considering that the financial viability of such activities appears to be questionable. We believe it would be inappropriate for BLM to allow these activities unless it is prepared to cover the costs of remediating hazardous or unsightly mining operations and reclaiming the land if the claimant fails to perform these functions.

We strongly suggest that BLM include in its report to Congress a discussion of the low leasable and locatable mineral value potential of unencumbered (d)(1) lands and the likelihood that any future developments would be financially unsound. On the other hand, there is tremendous potential for conserving natural resource values on these lands. Thus, BLM should recommend that Congress refrain from acting on the (d)(1) report and that it maintain the (d)(1) withdrawals until BLM can systematically analyze the conservation values of these lands through its RMP and NEPA processes. BLM also must inventory multiple-use opportunities, mitigate potential impacts, and assign appropriate land classifications and protective allocations for these lands.

Thank you again for the opportunity to participate in this review of ANCSA 17 (d)(1) withdrawals. We hope that our comments have provided useful recommendations that BLM will incorporate into the report to Congress as per Section 207 of ALTAA. We look forward to continue working with BLM through the Resource Management Planning processes to identify specific areas where (d)(1) withdrawals should be maintained or lifted as appropriate for long-term resource sustainability and multiple uses of the lands.

Sincerely,

Alaska Coalition

Dan Ritzman
Executive Director
750 West 2nd Avenue #205
Anchorage, Alaska 99501

Alaska Conservation Voters

Alaska Conservation Alliance
Tom Atkinson
Executive Director
PO Box 100660
Anchorage, Alaska 99510

Campaign for America's Wilderness

Ken Rait
Campaigns Director
4035 N.E. Sandy Blvd., Ste. 242
Portland, OR 97212

Deborah Lee Williams and Associates

Deborah Williams
Executive Director
308 G Street, Suite 219
Anchorage, AK 99501

Earthworks ~ Mineral Policy Center

Bonnie Gestring
Northwest Regional Staff
114 W. Pine St.
Missoula, Montana 59802

Natural Resources Defense Council

Charles Clusen
Director, Alaska Project
1200 New York Ave., NW, Suite 400,
Washington, DC 20005

Northern Alaska Environmental Center

David van den Berg
Executive Director
830 College Road
Fairbanks, Alaska 99701

Sierra Club

Betsy Goll
Alaska Representative
333 W. 4th Ave, Suite 307
Anchorage, Alaska 99501

The Wilderness Society

Eleanor Huffines
Alaska Regional Director
430 West 7th Avenue, Suite 210
Anchorage, Alaska 99501

Cc: Becca Bernard, Trustees for Alaska
Frances Raskin, Trustees for Alaska
Demian Schane, Earthjustice

Attachments: Table1.;Supplement to Table 1; Area Maps 1,2,5,10,12

East Alaska RMP Planning Area

The following lands and rivers were determined eligible for Wild and Scenic River designation in the Draft East Alaska RMP/EIS. Any additional rivers determined in planning documents to be eligible or suitable for protection under the Wild and Scenic Rivers Act should also have ANCSA 17 (d)(1) withdrawals maintained to help preserve the current resource condition of their outstandingly remarkable river values until land conveyances are completed or a protective management strategy is established.

Bering Region

- Nearly one million acres of BLM lands qualify for protection in the Bering region. The glaciated and high alpine landscape, outstanding biodiversity, and rare plants and animals is unique to BLM managed lands across the nation. Biodiversity includes migratory birds that stage in the Bering region, harbor seals, mountain goats, bears, rare plant species, and the largest and longest glacier in North America, the Bering Glacier. The Alaska Coalition and several other organizations submitted a written nomination specifically for the Bering Region Research Natural Area to the BLM in July 2003.

West Fork Gulkana River

- A large percentage of the world's known population of trumpeter swans, a BLM –Alaska designated Sensitive Status Species, is the focus of this proposed ACEC. A large number of other waterfowl utilize the amazing wetlands of the West Fork for breeding grounds. The ACEC would cover nearly one-half million acres. Trophy-size bull moose inhabit the watershed and would benefit from the ACEC; the moose habitat in the West Fork of the Gulkana is impacted by encroaching off-road vehicle use. Sockeye and king salmon stocks spawn in the tributaries of the West Fork of the Gulkana. The ACEC would compliment the management scheme for the lower portions of the Gulkana, which was designated by ANILCA as a Wild and Scenic River corridor in 1980.

Nelchina Caribou Herd Calving Grounds

- The Nelchina Caribou Herd is an integral part of the functioning ecosystem in Eastern Alaska. Subsistence hunters, wildlife photographers, recreationists, and tourists benefit from a thriving, healthy herd in the region. The northern third of the caribou herd calving grounds are on BLM administered lands. This ACEC of nearly one-half million acres, would protect the calving grounds, which are located in the tundra-covered foothills region of the Talkeetna Mountains. Caribou habitat is shrinking and under pressure from rapidly increasing OHV use and a flood of mining projects in the region.

Delta Bison Habitat

- This ACEC would be created to protect the Delta bison herd in Eastern Alaska. Quality habitat for the Delta Bison becoming scarce as more lands in the Delta Junction region are developed for crop and livestock production. The ACEC would be located in the riparian zone between the Black Rapids and Delta River would protect Delta Bison habitat and the traditional calving range for the herd. The ACEC would compliment the management scheme of the upper portions of the Delta River which was designated by ANILCA as a Wild and Scenic River corridor.

Maclaren River

50 miles, including the East and West Forks

Outstandingly Remarkable Values

- Views of the Alaska Range; habitat for moose and waterfowl
- Lower Maclaren has recreational value as it connects with Tyone River trail system.

Tangle Lakes trail system

12 miles, Tangle Lakes to Maclaren River

Outstandingly Remarkable Values

- Visual qualities; fish, wildlife and recreational values.

Monsoon Creek/Lake

13 miles, Tributary to West Fork Gulkana River

Outstandingly Remarkable Values

- Scenic and fisheries values
- Extension of Gulkana National Wild and Scenic River

Victor Creek

20 miles, Tributary to West Fork Gulkana River

Outstandingly Remarkable Values

- Scenic values
- Major anadromous fish spawning area
- Extension of Gulkana National Wild and Scenic River

South Branch of the West Fork of the Gulkana River

9 miles, tributary to the West Fork of the Gulkana River

Outstandingly Remarkable Values

- Scenic, fish, and wildlife values
 - Recreational opportunities
 - Extension of Gulkana National Wild and Scenic River
- * This river system was determined *suitable* for Wild and Scenic River designation if retained in long-term federal ownership. Draft East Alaska RMP, April 2005

Hungry Hollow Creek

12 miles, Tributary to Middle Fork Gulkana River

Outstandingly Remarkable Values

- Northernmost population of steelhead trout
- Extension of Gulkana National Wild and Scenic River

12-mile Creek,

13 miles, Tributary to main stem of Gulkana River

Outstandingly Remarkable Values

- Extension of Gulkana National Wild and Scenic River. *It is presumed that BLM intended to recognize that 12-mile creek also possesses the same outstandingly remarkable values which the Gulkana National Wild and Scenic River was designated to protect.*

Tyone River

25 miles, Tributary to Maclaren River

Outstandingly Remarkable Values

- Historic and cultural values

Ewan Lake

In Gulkana River watershed

Outstandingly Remarkable Values

- Historic and cultural values

Fish Lake system

In Gulkana River watershed

Outstandingly Remarkable Values

- Scenic, wildlife, and fisheries values
- Extension of Gulkana National Wild and Scenic River

Chistochina River

25 miles, East Fork

Outstandingly Remarkable Values

- Wildlife and fisheries values

Sourdough Creek

21 miles, Tributary to main stem Gulkana River

Outstandingly Remarkable Values

- Extension of Gulkana National Wild and Scenic River. *It is presumed that BLM intended to recognize that 12-mile creek also possesses the same outstandingly remarkable values which the Gulkana National Wild and Scenic River was designated to protect.*

Haggard Creek

13 miles, Tributary to Sourdough Creek

Outstandingly Remarkable Values

- Extension of Gulkana National Wild and Scenic River. *It is presumed that BLM intended to recognize that 12-mile creek also possesses the same outstandingly remarkable values which the Gulkana National Wild and Scenic River was designated to protect.*

Susitna River

152 miles, Portion above Devil's Canyon

Outstandingly Remarkable Values

- Scenic values
- Floatboating opportunities
- Fish and wildlife values

Suslota Creek

24 miles, Slana area

Outstandingly Remarkable Values

- Scenic, recreation, and wildlife values

Tonsina River

55 miles, Tributary to the Copper River

Outstandingly Remarkable Values

- Recreational and wildlife values

Greyling Creek

15 miles, Tributary to Tonsina River

Outstandingly Remarkable Values

- Scenic values (Chugach Mountains)
- Wildlife and fisheries values

Tiekel River

40 miles, Tributary to Copper River

Outstandingly Remarkable Values

- Scenic values, hanging glaciers

Bernard Creek

20 miles, Tributary to Tonsina River

Outstandingly Remarkable Values

- Scenic and recreational values

Liberty Creek

14 miles, Tributary to Copper River

Outstandingly Remarkable Values

- Scenic and recreational values

Kaliakh River

40 miles, Bering Glacier area, flows into Gulf of Alaska

Outstandingly Remarkable Values

- Scenic, recreational, and wildlife values

Clearwater Creek

22 miles, Tributary to Susitna River

Outstandingly Remarkable Values

- Unique clearwater stream
- Recreation, fish, and wildlife values

Brushkana Creek

12 miles, Tributary to Nenana River

Outstandingly Remarkable Values

- Scenic, recreation, historical, fish, and wildlife values

Nenana River

40 miles, Upper portion above Parks Highway

Outstandingly Remarkable Values

- Scenic, recreation, and wildlife values

Ring of Fire RMP Planning Area

The Draft Ring of Fire RMP/EIS has not been released for public review. The following river systems and lands were nominated by the public during the scoping process for consideration as potential Wild and Scenic Rivers and Areas of Critical Environmental Concern. Any additional rivers determined in planning documents to be eligible or suitable for protection under the Wild and Scenic Rivers Act should also have ANCSA 17 (d)(1) withdrawals maintained to help preserve the current resource condition of their outstandingly remarkable river values until land conveyances are completed or a protective management strategy is established.

Iniskin River, Western Cook Inlet

- Wildlife habitat, especially brown bears
- Fisheries, excellent spawning and rearing habitat for salmon
- Scenery within the Iniskin valley is stunning, as well as the views of Cook Inlet, adjacent mountains and nearby St. Augustine volcano.
- Recreational hunting and subsistence values

Kirschner Lake, Western Cook Inlet

- Unique scenic values, including a stunning waterfall that drops over sheer coastal cliffs into Cook Inlet.

Ursus Cove River System, Western Cook Inlet, Bruin Bay

- Wildlife and fisheries values
- Scenic values

McArthur River and Blockade Glacier and Lake, Western Cook Inlet

- Remarkable visual and recreation values
- Wildlife habitat for moose and bears

Harriet Creek, Western Cook Inlet

- Wildlife habitat and fisheries values

Chilligan River, Western Cook Inlet, Tributary of Chakachamna Lake

- Outstanding scenery and recreation resources

Barbara Creek, Port Heiden area

- Critical shorebird habitat for many species, including the Stellar's Eider and Beringian marbled godwit

Reindeer Creek, Port Heiden area

- Critical shorebird habitat for many species, including the Stellar's Eider and Beringian marbled godwit

Tsirku River, Haines area

- Scenery and recreation resources
- Critical wildlife habitat, especially for mountain goats
- Cultural resources

Takhin River, Haines area

- Scenery and recreation resources
- Critical wildlife habitat, especially for mountain goats
- Cultural resources

Ferebee Glacier & River, Haines area

- Scenery and recreation resources

Chilkat River, Haines area

- Scenery and recreation resources
- Critical wildlife habitat, especially for mountain goats
- Cultural resources
- Geologic values

Knik River, Southcentral Alaska

- Outstanding scenic values and recreation opportunities
- Cultural values

Friday Creek, Tributary of Knik River

- Scenery and recreation resources

Hunter Creek, Tributary to Knik River

- Scenery and recreation resources

Neacola Mountains and Blockade Lake

- Remarkable visual and recreation resources on unselected BLM administered lands encompassing the Neacola Icefield and Blockade Glacier and Lake are well-deserving of ACEC designation. The extreme visual beauty of the seemingly endless blue and white glacial expanses, surrounded by the Neacola's jagged mountain peaks is a majestic and awe-inspiring. This scenery embodies the immense spirit of Alaska's vast wildlands. Nearly all the surrounding lands are managed for conservation; the unit is bordered on the south by Lake Clark National Park Wilderness and is located close to Redoubt Bay State Critical Habitat Area and Trading Bay State Game Refuge to the east. The BLM would be consistent with federal, state, and borough land planning in recognizing the outstanding qualities of the area and the need

for conservation-minded management practices through the designation of the Neacola-Blockade Lake ACEC.

- Terrestrial wildlife habitat of high value includes concentrated moose winter areas and post-rutting habitat. The DNR Kenai Area Plan mentions several species in the Neacola Mountain region. Black bear habitat may warrant special designation. A notable Trumpeter swan nesting area is located at the snout of Blockade Lake. There are genetically isolated small mammal species in the vegetated high country on the east side of the block as well.

Ursus Cove-Bruin Bay, Kirschner Lake Complex

- The lands administered by the BLM in the Ursus Cove, Kirschner Lake and Bruin Bay Complex are ecologically diverse; coastal estuary habitats, shellfish concentrations, and marine mammals as well as world-class brown bear habitat make these lands unique. The area has been recognized for its outstanding habitat values; the National Park Service manages lands to the north as Lake Clark National Park Wilderness and the McNeil River State Game Sanctuary lies to the south.
- The terrestrial habitat in the Ursus Cove-Bruin Bay complex is outstanding. The Nature Conservancy has identified the Ursus Cove-Bruin Bay complex as a core area of biological significance. Coastal waters, drainages and streams provide spawning and rearing habitat for salmon. This stretch of southwestern Cook Inlet, including Kamishak Bay, contains some of the most important and biologically productive ecological systems in the Gulf of Alaska. Marine resources are also significant in the Ursus Cove-Bruin Bay complex; the cove provides habitat for a high concentration of spawning Pacific herring.

Port Heiden Units

- The two small parcels of BLM administered land near Port Heiden, which include a segment of Barbara Creek and the upper delta of Reindeer Creek, exist within a region of the Alaska Peninsula noted by the Alaska Department of Natural Resources as critical waterfowl and shorebird habitat. The area is critical habitat for Stellar's eider, a threatened species of international significance. In the spring, the majority of the world's population of Stellar's Eider migrates to the Bristol Bay coast of the Alaska Peninsula. In winter, nearly 80% of the Pacific population winters along the Alaska Peninsula, southern Cook Inlet, as well as other areas in Southwest Alaska. The Port Heiden area is known to host the Beringian marbled godwit, which does not occur elsewhere on the globe—giving it special status bird on the list of Migratory Bird Act. Tens of thousands of dunlin, western sandpiper, bar-tailed godwit and rock sandpiper use this locale as a staging area.

Port Moller Units

- Two parcels of BLM administered lands south of Port Moller contain important bird, mammal, and marine habitat with more than local significance. The Port Moller region is noted for critical waterfowl and shorebird habitat, as well as important habitat for the Southern Alaska Peninsula Caribou Herd, fulfilling the BLM relevance criteria for ACEC designation. Notable bird species are known to inhabit the Port Moller area throughout the year. The area is important habitat for the Stellar's Eider, a threatened species, as well as King Eider. The nearby Nelson Lagoon is critical habitat for Stellar's Eider during molting season. The parcels of BLM are known to have Tundra Swan nesting and brooding concentrations identified by the US Fish and Wildlife Service. Waterfowl are abundant at lakes, ponds and wetlands along the Bering Sea coast south of Port Moller-Herenden Bay.
- Mammal species known to inhabit the uplands of the Port Moller area include Brown bear, wolverine, caribou, and in riparian zones, moose. In 2003 Alaska Peninsula and Bristol Bay Basin Ecoregional Assessment, The Nature Conservancy identified the Port Moller area, located to the north of the BLM administered lands, as a "core area" of biological significance.

Palmer Hay Flats, Knik River Valley and Other Southcentral Lands

- The BLM is the only land-managing agency that has not identified and recognized areas with conservation value in the Cook Inlet Ecoregion.

Haines Area BLM Lands

- The BLM lands in the Haines region represent a unique diversity and assemblages of plants and animals in the where coastal and interior communities mix. The diversity in this area is some of the greatest in Alaska, in terms of bird, animal, and plant communities. Lodgepole pine fire relationships are an example of some of the unique ecosystem functions that are represented in this area of ecological transition. Alaska Coalition supports ACEC or RNA status for the complex of lands managed by BLM in the Haines region. In our management comments, we recommended management objectives must be established for the ACEC/RNA to protect local mountain goat populations.
- The goal of the Alaska Coalition is to effectively protect the local mountain goat populations threatened by commercial helicopter activities, preserve the pristine riverine habitat preferred by Bald Eagles and other waterfowl. In addition, the ACEC/RNA mitigation guidelines would mitigate the effects of any proposed or permitted surface disturbing activities from disrupting the natural scenic beauty of these wild lands and any potentially devastating impacts on the primarily tourism based economies of the local communities.

Southeast Temperate Rainforest Parcels

- Intact temperate rainforests, such as those found in the lower elevations on some parcels of BLM lands are rare in Southeast Alaska, the United States, and globally. Forested lands in Southeast Alaska are subject to potential severe deforestation and ecosystem destruction due to conflicting management practices among their fragmented owners, including the BLM, the US Forest Service, the State of Alaska and various Native Corporations. These lands are at risk of being cleared of all commercially important forests in the near future. Alaska Coalition has requested that BLM use the Ring of Fire planning process to inventory and prioritize for the protection of small parcels of these incredibly ecologically valuable lands. BLM lands in Southeast Alaska include brown bear habitat, fish spawning streams, and small wetlands that are home unique species of amphibians. Each of these small parcels may qualify for ACEC or RNA status.

Bristol Bay RMP Planning Area

The Draft Bay RMP/EIS has not been released for public review. The following river systems were nominated by the public during the scoping process for consideration as potential Wild and Scenic Rivers. Any additional rivers determined in planning documents to be eligible or suitable for protection under the Wild and Scenic Rivers Act should also have ANCSA 17 (d)(1) withdrawals maintained to help preserve the current resource condition of their outstandingly remarkable river values until land conveyances are completed or a protective management strategy is established.

Alagnak National Wild River

The Southwest Alaska Conservation Council has identified the Alagnak River as a *Priority Salmon Conservation Watershed* for five Pacific species, which include 259,000 sockeye salmon and 137,000 pink and coho salmon.¹ Parcels of BLM-administered uplands adjacent to the designated Alagnak National Wild River should be evaluated for their recreational, fisheries, visual, wildlife, and subsistence resources. Management of these parcels for ORV use, mineral development, and commercial and non-commercial recreation activities should be consistent with the NPS management directives for the Alagnak NWR.

Kvichak River Tributaries

Kvichak Bay Area

Kvichak Bay has been identified by Audubon Alaska as an *Important Bird Area in the Bering Sea* for waterfowl and shorebirds (2002). A portion of Kvichak Bay is included in the Bristol Bay

¹ Alaska Peninsula and Bristol Bay Basin Ecoregional Assessment, The Nature Conservancy, 2004.

Fisheries Reserve, which prohibits surface entry permits to develop oil or gas leases on submerged or shore lands on state-owned or controlled land until the legislature specifically finds that the entry will not constitute danger to the fishery.² BLM managed lands and streams adjacent to the Native-patent shore lands of Kvichak Bay should be evaluated for fisheries resources and ecological function. Any proposals for mineral development activities on these lands should be closely analyzed and, if permitted, required to operate under stringent mitigation measures to ensure environmentally sound operating procedures.

Kaskanak Creek

- Critical habitat for salmon spawning and resident fish species, especially the world class trophy rainbow trout population. Kaskanak Flats is a critical rainbow trout spawning area.³
- Essential to proper ecological function of the Bristol Bay fisheries.
- Wildlife habitat for moose, caribou and brown bears.
- Subsistence resources.
- Recreational opportunities.
- Likelihood of cultural and archaeological resources.

Ben Courtney Creek

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Wildlife habitat for moose and caribou.
- Subsistence resources.
- Recreational opportunities.

Ole Creek

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Wildlife habitat for moose and caribou.
- Recreational opportunities.

Nushagak River Tributaries

The Nushagak River watershed provides important habitat to moose, especially in lowland forests near lakes and rivers. Caribou from the Mulchatna herd migrate and calve through the area where tundra and open boreal forest is found. The area also provides habitat for brown and black bears, wolverine, wolves and fox. The Nushagak area provides staging, nesting, molting or year round habitat for some 150 species of birds. These include 32 species of waterfowl, 22 species of shore birds, 55 species of passerine, 17 species of raptors, 5 species of upland birds and 10 species of sea birds. Audubon Alaska considers Nushagak Bay an *Important Bird Area in the Bering Sea* for waterfowl and shorebirds. The rich biological resources of the Nushagak River have also been identified by the State of Alaska. The state has identified the Nushagak Mulchatna Rivers Recreation Area as an Area which Merits Special Attention (BBCRSAB 1990), and the Bristol Bay Plan for State Lands (ADNR 1984) identified the Nushagak River drainage as a priority for conservation. Part of Nushagak Bay is in the Bristol Bay Fisheries Reserve, which prohibits surface entry permits to develop oil or gas leases on submerged lands or shorelands on state owned or controlled land until the legislature specifically finds that the entry will not constitute danger to the fisheries.⁴

Koggiling Creek

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Wildlife habitat for moose and caribou.

² Alaska Peninsula and Bristol Bay Basin Ecoregional Assessment, The Nature Conservancy, 2004.

³ Alaska Peninsula and Bristol Bay Basin Ecoregional Assessment, The Nature Conservancy, 2004.

⁴ Alaska Peninsula and Bristol Bay Basin Ecoregional Assessment, The Nature Conservancy, 2004.

- Recreational opportunities.

Klutuk River

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Wildlife habitat for moose and caribou.
- Recreational opportunities.

Lake Iliamna Tributaries

Upper Talarik Creek

In 1984, the Alaska DNR Bristol Bay Area Plan closed the anadromous portions of Upper Talarik Creek and any state owned uplands 100 feet from ordinary high water mark to new mineral entry for the protection of fisheries and recreational resources in accordance with AS 38.05.185.⁵

- Critical habitat for salmon spawning and resident fish species, especially the world class trophy rainbow trout population.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Wildlife habitat for moose, caribou and bears.
- Subsistence resources.
- Recreational opportunities.
- Likelihood of cultural and archaeological resources.

Iliamna River

In 1984, the Alaska DNR Bristol Bay Area Plan closed the anadromous portions of Iliamna River and any state owned uplands 100 feet from ordinary high water mark to new mineral entry for the protection of fisheries and recreational resources in accordance with AS 38.05.185.⁶

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Remarkable visual resources.
- Wildlife habitat for moose, caribou and bears.
- Recreational opportunities.
- Likelihood of cultural and archaeological resources.

Goodnews River and Tributaries

The Southwest Alaska Conservation Council identified the Goodnews River as a *Priority Salmon Conservation Watershed* for five Pacific salmon species in 2002. The US Fish & Wildlife Service has also identified the Goodnews River drainage as a *Special Value Area* in their 1986 Togiak National Wildlife Refuge Comprehensive Conservation Plan. The upper part of the Goodnews River is included within the Refuge's designated Wilderness Area.⁷

South fork of Goodnews River

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Subsistence resources.
- Potential for current or future ORV use.
- Commercial recreation opportunities.

Middle fork of Goodnews River

⁵ Accessed on-line at http://www.dnr.state.ak.us/mlw/planning/areaplan/bristol.pdf/ch2_minerals.pdf, March 2005.

⁶ Accessed on-line at http://www.dnr.state.ak.us/mlw/planning/areaplan/bristol.pdf/ch2_minerals.pdf, March 2005.

⁷ Alaska Peninsula and Bristol Bay Basin Ecoregional Assessment, The Nature Conservancy, 2004.

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Subsistence resources.
- Potential for current or future ORV use.
- Commercial recreation opportunities.

Main Fork of Goodnews River

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Subsistence resources.
- Potential for current or future ORV use.
- Commercial recreation opportunities.

Barnum Creek – tributary of the main fork of Goodnews River.

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Subsistence resources.
- Commercial recreation and sportfishing activities occur downstream at the stream's confluence with Goodnews River.

Tivyagak Creek – tributary of the South Fork of Goodnews River.

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Subsistence resources.
- Commercial recreation opportunities.

Puyulik Creek – tributary of the Goodnews River.

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bristol Bay fisheries.
- Subsistence resources.
- Commercial recreation opportunities.

Bering Sea Coastal Streams

Jacksmith Creek

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bering Sea fisheries.
- Potential for recreational opportunities.

Cripple Creek

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bering Sea fisheries.
- Critical migratory bird habitat in association with Carter Spit.

Indian River

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bering Sea fisheries.
- Critical migratory bird habitat in association with Carter Spit.

Arolik River and Tributaries

South Fork of Arolik River

- Critical habitat for salmon spawning and resident fish species.
- Essential to proper ecological function of the Bering Sea fisheries.

- Extensive fly-in commercial recreation and sport fishing operations currently occur downstream of the BLM-managed parcels and there is potential for recreation activities to occur on the public lands.

Faro Creek

- Potential for significant cultural and archaeological resources due to the presence of archaeological ruins on neighboring downstream Native patent lands.
- An old mining trail system encompasses these public lands and may provide access routes to off road vehicles.

Kobuk-Seward RMP Planning Area

The Draft Kobuk-Seward RMP/EIS has not been released for public review. The below river systems were nominated by the public during the scoping process for consideration as potential Wild and Scenic Rivers. Any additional rivers determined in planning documents to be eligible or suitable for protection under the Wild and Scenic Rivers Act should also have ANCSA 17 (d)(1) withdrawals maintained to help preserve the current resource condition of their outstandingly remarkable river values until land conveyances are completed or a protective management strategy is established.

Coastal streams on the Seward Peninsula are significant salmon spawning streams that support the needs of local subsistence users, as well as the activities of sport and commercial fishermen. Large populations of resident fish species, particularly Dolly Varden and Arctic Grayling are also present. Considering the historic human use of lands within the planning area over the past 10,000 years, there is a high likelihood that undiscovered cultural or archaeological remains may be present along these river systems. The following streams have been identified through scoping and recommended for evaluation as potential Wild & Scenic Rivers:

Tubutulik River
Inglutalik River
Shaktoolik River
Ungalik River
Koyuk River
Agiapuk River
Fish River
Kivalina River
Wulik River

Lands include:

Western Arctic Caribou Herd Habitat

- Alaska's largest caribou herd, the 450,000-member Western Arctic caribou herd (WACH), relies upon the public lands within the Kobuk-Seward Peninsula planning area for critical habitat. The Lisburne Peninsula represents a large portion of the WACH's summer range and is also an important Insect Relief area for the herd. The BLM managed lands in the Nulato Hills consist of essential WACH winter range. Both of these areas play a critical role in supporting the local subsistence lifestyle. The Western Arctic Caribou Working Group, a collaborative working group of 20 village representatives from Northwest Alaska, has nominated BLM lands throughout the planning area for ACEC status. The Alaska Coalition supports the nomination and will provide support, where necessary, to ensure that the nominations are included in the draft RMP for the Kobuk-Seward.

Kigluaik Mountains

- Within the Kigluaik Mountains, approximately 50 glacially formed cirque lakes support populations of reproductively isolated fish species. These genetically unique Arctic char populations have been identified by BLM as a sensitive species. Spectacular vistas of mountain passes and glacial valleys are available within this area. The Kigluaik Mountains offer a wide variety of road accessible recreational opportunities, including fishing, hiking, backpacking, mountaineering, backcountry skiing, snowmachining, dog mushing, and photographing wildlife. Historic gold mining activity is also known to have occurred within the area.

Windy Cove

- Features of interest include the Kigluaik fault, coastal tundra wetland plant communities, and habitat for migratory Eurasian birds with limited North American distribution. This area is one of the last segments of tidewater shoreline of the northern Seward Peninsula remaining in BLM management. The Kigluaik fault line cliff is the most active and most-recently active of the Seward Peninsula faults.

Mt. Osborne

- Unique geology provides habitat for rare plant species, small mountain glaciers and moraines, highly metamorphosed rocks, and habitat for gyrfalcon and snow bunting populations.

Camp Haven Gap

- Primary features of interest included exposed limestone near the western range extent of white spruce. Rare plant species are supported on the carbonate rock exposures.

Clear Creek Hot Springs

- Unique geologic features and the relatively pristine hot springs provide excellent habitat to support specialized plant species and various vegetation range extensions.

Designated National Wild & Scenic Rivers

Mineral withdrawals should be maintained within all designated Wild and Scenic River corridors and along their tributary streams. These withdrawals will provide additional management tools and authority to ensure that the outstandingly remarkable resource values for which the rivers were designated will be protected from impacts of mineral leasing, entry, and development. BLM Alaska currently manages the following six designated National Wild and Scenic Rivers:

Delta National Wild & Scenic River

Gulkana National Wild & Scenic River

Unalakleet National Wild River

Birch Creek National Wild & Scenic River

Beaver Creek National Wild & Scenic River

40-Mile National Wild River

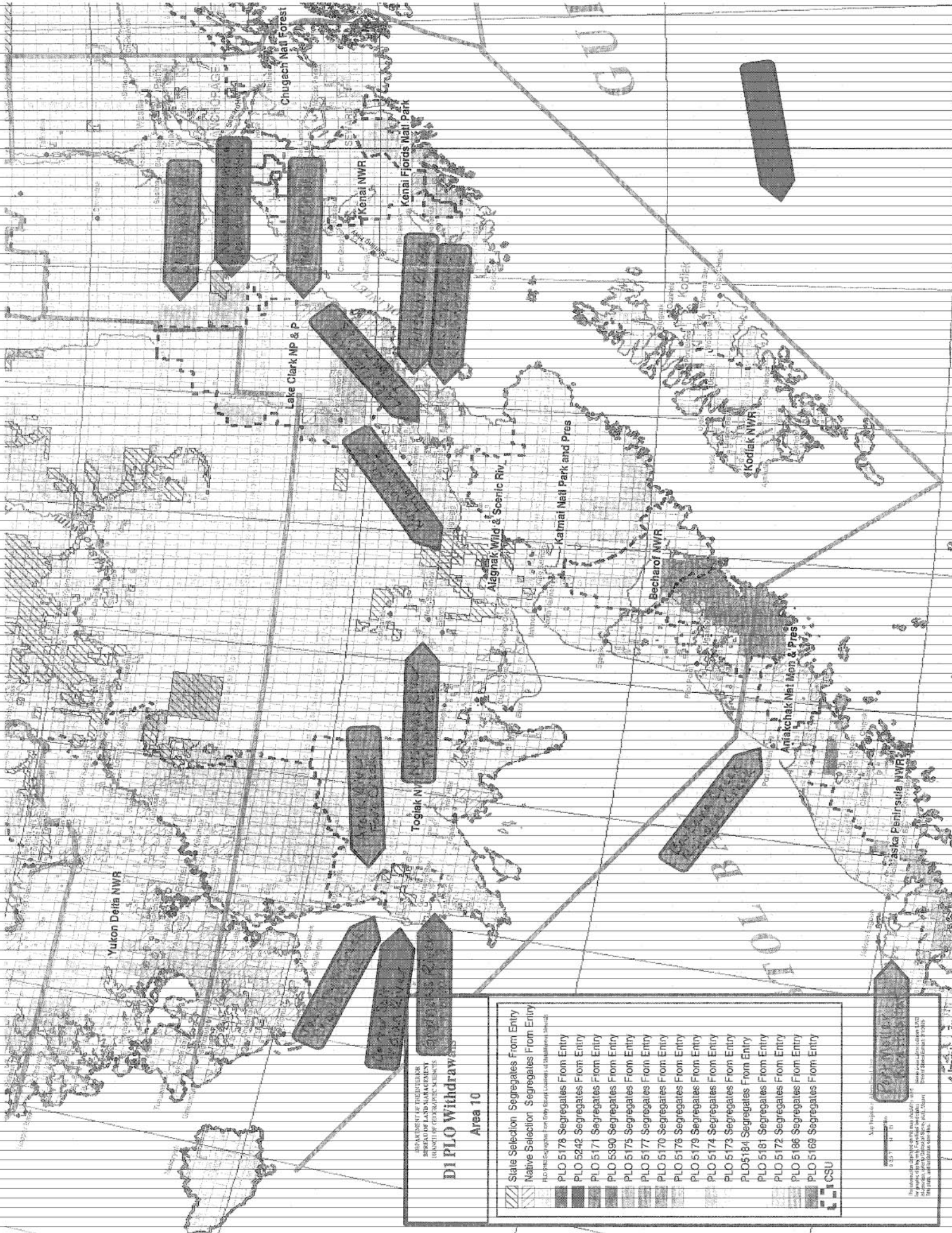
**Table 1. Alaska Coalition et al ANCSA 17 (d)(1)
Recommendations for
Retaining Public Land Orders
15-Sep-05**

This table recommends specific BLM-managed lands that should have ANCSA 17 (d)(1) withdrawals maintained.
The majority of these lands have been identified through the public scoping processes of ongoing Resource Management Plans (RMPs).
These lands contain significant resource values that are being evaluated for conservation potential and/or multiple use allocation.
We believe that the appropriate procedure for reviewing ANCSA 17 (d)(1) withdrawals on BLM-managed lands is through the RMP process.

Map Area	Planning Area	Geographic Description	PLO	Resource Values	Existing or Potential Protective Allocation
2	White Mountains	White Mountains National Recreation Area	5173, 5184	Scenic beauty, primitive recreation opportunities	Designated NRA, several RNAs
2,3	Steele	Steele National Conservation Area	5180	Scenic beauty of national interest, primitive recreation opportunities, caribou calving grounds, large and small mammal habitat	Designated NCA, contains Birch and Scenic River
5,6,9	Central	Unalakleet National Wild and Scenic River	5173, 5179, 5180, 5184	Outstanding salmon fisheries, recreation opportunities, and cultural/historic resources	Designated Wild and Scenic River
2	Fortymile	Beaver Creek National Wild and Scenic River	5179, 5180	Outstanding recreational, fisheries, visual, wildlife, and subsistence resources	Designated Wild and Scenic River
2	Fortymile	Fortymile National Wild and Scenic River	5173, 5180, 5184	Outstanding recreational, fisheries, visual, wildlife, and subsistence resources	Designated Wild and Scenic River
2	Fortymile	Birch Creek National Wild and Scenic River	5179, 5180	Outstanding recreational, fisheries, visual, wildlife, and subsistence resources	Designated Wild and Scenic River
1,2	East Alaska	Delta National Wild and Scenic River	5174, 5178, 5184	Outstanding recreational, fisheries, visual, wildlife, and subsistence resources	Designated Wild and Scenic River
1,2,8	East Alaska	Gulkana National Wild and Scenic River	5178, 5180, 5184, 5186	Outstanding recreational, fisheries, visual, wildlife, and subsistence resources	Designated Wild and Scenic River
1	East Alaska	Bering Glacier	5178, 5179	Migratory birds, harbor seal haulouts, large mammal habitat, paleontological resources, glacier research and primitive recreational opportunities	Resource Natural Area
1	East Alaska	West Fork of Gulkana River	5178, 5180	Trumpler Swan habitat (BLM sensitive species), migratory waterfowl, large mammal habitat, salmon spawning, primitive recreational opportunities	Suitable Wild and Scenic River
1	East Alaska	Nelchina Caribou Herd Calving Grounds	5180	Nelchina Herd Caribou calving grounds, primitive recreational opportunities, large mammal habitat	ACEC
1	East Alaska	Delta Bison Habitat	5180	Delta Bison calving grounds, large mammal habitat	ACEC
1,2	East Alaska	Madison River	5178	Views of the Alaska Range, habitat for moose and waterfowl, recreation values	Eligible Wild and Scenic River
1,2	East Alaska	Tangle Lakes	5180	Visual qualities, fish, wildlife and recreational values	Eligible Wild and Scenic River
1	East Alaska	Monsoon Creek near West Fork of Gulkana	5178	Scenic values, major anadromous spawning, extension of Gulkana Wild and Scenic River	Eligible Wild and Scenic River
1	East Alaska	Victor Creek	5178	Scenic values, major anadromous spawning, extension of Gulkana Wild and Scenic River	Eligible Wild and Scenic River
1	East Alaska	South Branch of the West Fork of the Gulkana River	5178	Scenic values, major anadromous spawning, extension of Gulkana Wild and Scenic River	Eligible Wild and Scenic River
1	East Alaska	Hungry Hollow Creek	5178	Northernmost population of steelhead trout, extension of Gulkana Wild and Scenic River	Eligible Wild and Scenic River
1	East Alaska	12 mile Creek	5178	Extension of Gulkana Wild and Scenic River	Eligible Wild and Scenic River
1	East Alaska	Thorne River	5178	Historic and cultural values	Eligible Wild and Scenic River
1	East Alaska	Ewan Lake	5178	Historic and cultural values	Eligible Wild and Scenic River
1	East Alaska	Fish Lake System	5178	Scenic values, major anadromous spawning, extension of Gulkana Wild and Scenic River	Eligible Wild and Scenic River
2	East Alaska	Chitochina River	5184	Wildlife and fisheries values	Eligible Wild and Scenic River
1	East Alaska	Sourdough Creek	5178	Extension of Gulkana Wild and Scenic River	Eligible Wild and Scenic River
1	East Alaska	Haggard Creek	5178	Extension of Gulkana Wild and Scenic River	Eligible Wild and Scenic River
1	East Alaska	Susitna River	5180	Salmon spawning, recreational opportunities, water quality	Eligible Wild and Scenic River
1	East Alaska	Tonsina River	5184	Recreational and wildlife values	Eligible Wild and Scenic River
1	East Alaska	Grewing Creek	5184	Scenic (Chugach Mountains), wildlife and fisheries values	Eligible Wild and Scenic River
1	East Alaska	Tietel River	5184, 5179	Scenic, hanging glaciers	Eligible Wild and Scenic River
1	East Alaska	Bernard Creek	5184	Scenic and recreational values	Eligible Wild and Scenic River
1	East Alaska	Liberty Creek	5184	Scenic and recreational values	Eligible Wild and Scenic River
1	East Alaska	Kalakli River	5176	Scenic and recreational values, wildlife values	Eligible Wild and Scenic River
1	East Alaska	Clearwater Creek	5180	Unique clearwater stream, recreation, fish, and wildlife values	Eligible Wild and Scenic River
2	East Alaska	Brushkana Creek	5180, 5184	Scenic, recreation, historical, and wildlife values	Eligible Wild and Scenic River
2	East Alaska	Nenana River	5180	Scenic and recreational values, wildlife values	Eligible Wild and Scenic River
10	Ring of Fire	Iniskin River	5174	Wildlife habitat, especially brown bears, salmon spawning, outstanding scenery, recreational hunting and subsistence values	ACEC/RNA Wild and Scenic
10	Ring of Fire	Krischner Lake	5174	Scenic values, primitive recreational opportunities, brown bear habitat, unique cliff waterfall	ACEC/RNA
10	Ring of Fire	Urus Cove River System	5174	Coastal estuaries, brown bear habitat, primitive recreational opportunities, high concentration of herring spawn in adjacent waters	ACEC/RNA
10	Ring of Fire	McArthur River	5174	Wildlife habitat, important subsistence use area, black bear denning, salmon and Dolly Varden spawning, trumpeter swans, visual values	ACEC/RNA Wild and Scenic
10	Ring of Fire	Harriet Creek	5174	Important fish spawning habitat, large mammal habitat, primitive recreational opportunities, harbor seal haulouts, migratory waterfowl	ACEC/RNA
10	Ring of Fire	Chilligan River	5174	Important, large mammal habitat salmon spawning, habitat for Mulchama Caribou Herd, primitive recreational opportunities, visual values	Wild and Scenic River
10	Ring of Fire	Barbara Creek	5184	Critical waterfowl and shorebird habitat, including Steller's Eider habitat	ACEC/RNA
10	Ring of Fire	Reindeer Creek	8184	Critical waterfowl and shorebird habitat, including Steller's Eider habitat	ACEC/RNA
12	Ring of Fire	Tsirik River	n/a	Scenery, recreation resources, critical wildlife habitat for mountain goats, cultural resources	Wild and Scenic River
12	Ring of Fire	Takhin River	n/a	Scenery, recreation resources, critical wildlife habitat for mountain goats, cultural resources	Wild and Scenic River
12	Ring of Fire	Ferebee Glacier and River	5180	Scenery and recreation resources	Wild and Scenic River
12	Ring of Fire	Chikot River	5180	Scenery, recreation resources, critical wildlife habitat for mountain goats, cultural resources, geological values	Wild and Scenic River
1	Ring of Fire	Kuk River	5174, 5184	Outstanding scenic values, recreation opportunities, cultural values	Wild and Scenic River
1	Ring of Fire	Friday Creek	5174	Primitive recreational opportunity, large mammal habitat, scenery	ACEC/RNA
1	Ring of Fire	Hunter Creek	5174	Primitive recreational opportunity, large mammal habitat, scenery	ACEC/RNA

10	Ring of Fire	Neacola Mountains	5174	Scenic values, primitive recreational opportunities, small mammal habitat	ACEC/RNA
10	Ring of Fire	Brockade Glacier and Lake	5174	Scenic values, primitive recreational opportunities	ACEC/RNA
10	Ring of Fire	Bunt Bay	5174	Scenic values, primitive recreational opportunities, brown bear habitat	ACEC/RNA
10	Ring of Fire	Port Hidden Units	5184	Migratory bird habitat including King Eider, Tundra Swans, caribou habitat, and large mammal habitat	ACEC/RNA
10	Ring of Fire	Port Moller Units	5172	Migratory bird habitat including Tundra Swans, Lesser Canada, Great White-Fronted, and Snow Geese, large mammal habitat	ACEC/RNA
1	Ring of Fire	Palmer Hay Fields	n/a	Mountain goat habitat, diversity of plant and animal communities (ie. Lodgepole pine), recreational opportunities, scenic beauty	ACEC/RNA
12	Ring of Fire	Haines Area BLM Lands	5180	Intact temperate rainforests, unique geology, brown bear and large mammal habitat, important salmon spawning streams, wetlands	RNA
12	Ring of Fire	Southeast Temperate Rainforest Parks	n/a		RNA/ACEC
10	Bay	Alagnak National Wild River	5184	Outstanding recreational, fisheries, visual, wildlife, and subsistence resources	Wild and Scenic River
10	Bay	Kichuk Bay	5184	Important subsistence and sport fishery, salmon spawning	ACEC/RNA
10	Bay	Kaskanak Creek	5184, 5179	Salmon and rainbow trout spawning habitat, important wildlife habitat & subsistence hunting, cultural and archaeological resources	ACEC/RNA/Wild and Scenic River
10	Bay	Ben Country Creek	5184, 5179	Important subsistence and sport fishery, salmon spawning, large mammal habitat	ACEC/RNA/Wild and Scenic River
10	Bay	Ole Creek	5184	Salmon, rainbow trout spawning habitat, wildlife habitat & subsistence hunting, recreational, cultural and archaeological resources	ACEC/RNA/Wild and Scenic River
10	Bay	Kogolig Creek	5184	Salmon, rainbow trout spawning habitat, wildlife habitat & subsistence hunting, recreational, cultural and archaeological resources	ACEC/RNA/Wild and Scenic River
10	Bay	Kluluk River	5184	Salmon, rainbow trout spawning habitat, wildlife habitat & subsistence hunting, recreational, cultural and archaeological resources	ACEC/RNA/Wild and Scenic River
10	Bay	Upper Taluk Creek	5180	Salmon, rainbow trout spawning habitat, wildlife habitat & subsistence hunting, recreational, cultural and archaeological resources	ACEC/RNA/Wild and Scenic River
10	Bay	Ilama River	5184, 5174	Salmon, rainbow trout spawning habitat, wildlife habitat & subsistence hunting, recreational, cultural and archaeological resources	ACEC/RNA/Wild and Scenic River
10	Bay	Goodnews River	5184, 5179, 5181	Important salmon spawning watershed for five Pacific salmon species	Wild and Scenic River
10	Bay	Barnum Creek	5179	Important salmon spawning watershed for five Pacific salmon species	Wild and Scenic River
10	Bay	Tryapak Creek	5181, 5184	Important salmon spawning watershed for five Pacific salmon species	Wild and Scenic River
10	Bay	Poyuk Creek	5184	Important salmon spawning watershed for five Pacific salmon species	Wild and Scenic River
10	Bay	Jackson Creek	5181, 5184	Critical salmon spawning habitat, important fishery for the Bering Sea, migratory bird habitat, recreational opportunities	Wild and Scenic River
10	Bay	Cripple Creek	5181	Critical salmon spawning habitat, important fishery for the Bering Sea, migratory bird habitat near Carter Spit, recreational opportunities	Wild and Scenic River
10	Bay	Indian River	5184, 5181	Critical salmon spawning habitat, important fishery for the Bering Sea, migratory bird habitat near Carter Spit, recreational opportunities	Wild and Scenic River
10	Bay	South Fork of the Arctic River	5179	Critical salmon spawning habitat, important fishery for the Bering Sea, migratory bird habitat, recreational opportunities	Wild and Scenic River
10	Bay	Faro Creek	5179	Critical salmon spawning habitat, important fishery for the Bering Sea, migratory bird habitat, recreational opportunities	Wild and Scenic River
10	Bay	Carter Spit		Migratory waterfowl habitat, recreational opportunities	ACEC/RNA
5	Kobuk-Seward	Tubutuk River	5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Inglutuk River	5180, 5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Shakook River	5180, 5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Ungak River	5180, 5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Koyuk River	5180, 5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Agapuk River	5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Fish River	5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Kvalina River	5180, 5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Wulk River	5180, 5184	Coastal salmon spawning streams, subsistence use areas, sport and commercial fishing use area, potential for archeological sites	Wild and Scenic River
5	Kobuk-Seward	Western Arctic Caribou Hard Habitat	5180	Western Arctic Caribou Hard calving grounds, insect relief area, summer range, and winter range	ACEC/RNA
5	Kobuk-Seward	Kigluak Mountains	5180, 5176, 5184	Genetically isolated Char populations, primitive recreational opportunities	ACEC/RNA
5	Kobuk-Seward	Windy Cove		Coastal tundra wetland plant communities, migratory bird habitat, freshwater shoreline	ACEC/RNA
5	Kobuk-Seward	Mount Osborne	5184	Unique geology, rare plant species, gyrfalcon habitat, primitive recreational opportunities	ACEC/RNA
5	Kobuk-Seward	Camp Haven Gap	5180, 5184	Rare plant species, unique geology	ACEC/RNA
5	Kobuk-Seward	Clear Creek Hot Springs		Pristine hot spring, specialized plant communities	ACEC/RNA
3	Utility Corridor	Gabralith Lake	5180	Cultural, rare/sensitive plants, scenic values, lambing areas	ACEC
3	Utility Corridor	Wishak River	5180	Fishery, cultural resources	ACEC
3	Utility Corridor	Jim River	5180	Fishery, cultural resources	ACEC
3	Utility Corridor	Kanul Hot Springs	5180	Hot spring	ACEC
3	Utility Corridor	Niqu-Ilerak	5169	Geology, cultural resources	ACEC
3	Utility Corridor	Nugget Creek	5180	Lambing areas, mineral lick	ACEC
3	Utility Corridor	Poss Mountain	5180	Lambing areas, mineral lick	ACEC
3	Utility Corridor	Sagwon Bluffs	5180	Peregrine falcons	ACEC
3	Utility Corridor	Slope Mountain	5180	Lambing areas, mineral lick, cultural	ACEC
3	Utility Corridor	Snowden Mountain	5180	Lambing areas, mineral lick	ACEC
3	Utility Corridor	Sukapak Mountain	5180	Scenic, geology	ACEC
3	Utility Corridor	Took Lake Research Natural Area	5180	Research activities, cultural	RNA
3	Utility Corridor	West Fork Aliqu River	5180	Lambing areas, mineral lick	ACEC
6	Yukon	Box River Trailline	5180	See Fairbanks District Office Management Situation Analysis, Yukon Final RMPEIS on Research Natural Areas	RNA
7	Yukon	Redlands Lake	5180	See Fairbanks District Office Management Situation Analysis, Yukon Final RMPEIS on Research Natural Areas	RNA
7	Yukon	Arms Lake	5180	See Fairbanks District Office Management Situation Analysis, Yukon Final RMPEIS on Research Natural Areas	RNA
7	Yukon	Ichalling Creek Hot Springs	5180	See Fairbanks District Office Management Situation Analysis, Yukon Final RMPEIS on Research Natural Areas	RNA
7	Yukon	McQuisen Creek	5180	See Fairbanks District Office Management Situation Analysis, Yukon Final RMPEIS on Research Natural Areas	RNA
7	Yukon	Spooky Valley	5180	See Fairbanks District Office Management Situation Analysis, Yukon Final RMPEIS on Research Natural Areas	RNA
7	Yukon	Lake Tadolontien Phingos/South Summit	5180	See Fairbanks District Office Management Situation Analysis, Yukon Final RMPEIS on Research Natural Areas	RNA
5	Yukon	Tegogwak/Buckland River Watersheds	5180	Important wildlife habitat and subsistence use area	ACEC

6	Yukon	Katrel River	5180	Salmon spawning	ACEC
6	Yukon	Inglitak River	5180	Important watershed	ACEC
6	Yukon	Ungpak River	5180	Important watershed	ACEC
6	Yukon	Ghasa River	5180	Salmon spawning	ACEC
6	Yukon	Nulato River	5180	Salmon spawning, Important subsistence use area	ACEC
6	Yukon	North River	5180	Important watershed	ACEC
7	Yukon	Dubu-Kaiyuh Mountain Subunit	5180, 5184	Salmon spawning, Important subsistence use area, threatened and endangered species habitat	These specific ACEC areas are defined on
7.8	Yukon	Kuskokwim Subunit	5180	Salmon spawning, Important subsistence use area, threatened and endangered species habitat	This specific RNA is identified on
8	Yukon	Sulukana River Watershed	5173, 5180	Only known sheepish spawning habitat within planning area	ACEC
7	Yukon	Tozintan River Watershed	5173, 5180, 5184	Caribou calving, salmon spawning	ACEC
7	Yukon	Ray River	5173, 5180, 5184	Identified as important for management constraints /setback zones	na
7	Yukon	Squaw Creek	5180, 5184	Identified as important for management constraints /setback zones	na
7	Yukon	Clear, Bear, Caribou Creek Watersheds	5173, 5180	Salmon spawning	ACEC



DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
 DIVISION OF GEOPHYSICAL RESEARCH
D1 PLO Withdrawals
 Area 10

	State Selection Segregates From Entry
	Native Selection Segregates From Entry
	PLO 5178 Segregates From Entry
	PLO 5242 Segregates From Entry
	PLO 5171 Segregates From Entry
	PLO 5390 Segregates From Entry
	PLO 5175 Segregates From Entry
	PLO 5177 Segregates From Entry
	PLO 5170 Segregates From Entry
	PLO 5176 Segregates From Entry
	PLO 5179 Segregates From Entry
	PLO 5174 Segregates From Entry
	PLO 5173 Segregates From Entry
	PLO 5184 Segregates From Entry
	PLO 5181 Segregates From Entry
	PLO 5172 Segregates From Entry
	PLO 5186 Segregates From Entry
	PLO 5169 Segregates From Entry
	CSU

Scale: 0 5 10 Miles
 0 5 10 Kilometers
 Notwithstanding to what may appear on this map, the Bureau of Land Management does not warrant the accuracy of the information shown hereon. The user assumes all responsibility for the use of this information.

DI PLO Withdrawals

Area 12

State Selection Segregates From Entry
Native Selection Segregates From Entry
PLO 5178 Segregates From Entry
PLO 5242 Segregates From Entry
PLO 5171 Segregates From Entry
PLO 5360 Segregates From Entry
PLO 5175 Segregates From Entry
PLO 5177 Segregates From Entry
PLO 5170 Segregates From Entry
PLO 5176 Segregates From Entry
PLO 5179 Segregates From Entry
PLO 5174 Segregates From Entry
PLO 5173 Segregates From Entry
PLO 5184 Segregates From Entry
PLO 5181 Segregates From Entry
PLO 5172 Segregates From Entry
PLO 5186 Segregates From Entry
PLO 5169 Segregates From Entry



CSU

Map Scale: 1 inch = 10 miles

7.5 15 30

Source: Alaska Department of Land Management
Data: Alaska Department of Land Management
Map: Alaska Department of Land Management
Date: 10/1/2000

Klondike Gold Rush NHP

Tongass Natl Forest

Glacier Bay NP & P

Admiralty Is Natl Mon

Sitka Nat Historical Park

Misty Fjords Natl Mon

DIXON ENTER INC

<input checked="" type="checkbox"/>	State Selection Segregates From Entry
<input checked="" type="checkbox"/>	Native Selection Segregates From Entry

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PL05178 Segregated From Entry

PLI 05242 Segregates From Entry

[illegible]

PLU 5830 Saginaw Area From Italy
PLU 5176 Saginaw Area From Italy

PL05177 Segregates From Entry

PLU 5170 Segregates From Entry

PL05176 Segregates From Entry

PLU 5179 Segregates From Entry

PL05174 Segregates From Entry

P105173 Segregates From Entry

PL05181: Samoties From Entry

PI.O 5172 Segregates From Entry

PLC 5186 Segregates From Entry

PL05169 Segregates From Entry

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D1 PLO Withdrawals

Area 1

State Selection Segregates From Entry
Native Selection Segregates From Entry
PLO 5178 Segregates From Entry
PLO 5242 Segregates From Entry
PLO 5171 Segregates From Entry
PLO 5390 Segregates From Entry
PLO 5175 Segregates From Entry
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PLO 5181 Segregates From Entry
PLO 5172 Segregates From Entry
PLO 5186 Segregates From Entry
PLO 5169 Segregates From Entry
CSU

400 Feet = 1 Mile (1:62,500)

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OF ALASKA

D1 PLO Withdrawals Area 5

	State Selection Segregates From Entry
	Native Selection Segregates From Entry
	PLO 5178 Segregates From Entry
	PLO 5212 Segregates From Entry
	PLO 5171 Segregates From Entry
	PLO 5390 Segregates From Entry
	PLO 5175 Segregates From Entry
	PLO 5170 Segregates From Entry
	PLO 5176 Segregates From Entry
	PLO 5179 Segregates From Entry
	PLO 5174 Segregates From Entry
	PLO 5173 Segregates From Entry
	PLO 5184 Segregates From Entry
	PLO 5181 Segregates From Entry
	PLO 5172 Segregates From Entry
	PLO 5186 Segregates From Entry
	PLO 5168 Segregates From Entry
	CSU

Cape Krusenstern Nat Mon

Bering Land Bridge N Pres

Alaska Maritime NWR

NORTON SOUND

Unalakleet W & S

Innoko NWR

Shukpuk-Ungalik
Inupiatik Rivers

Mount St. Elias

Koyuk River

Selawik NWR

Kobuk Valley N

Noatak Natl Pres

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Scale: 1 inch = 10 miles

1:125,000



September 12, 2005

Bureau of Land Management
Alaska State Office
Attn: Section 207 Congressional Report (AK-932)
222 W. Seventh Ave., #13
Anchorage, AK 99513-7599

Dear Mr. Bisson:

Ahtna is hereby submitting written comments on D-1 Withdrawals.

1. Ahtna Inc. supports retention of all D1 Withdrawals. This would provide the greatest protection for natural resources and wildlife habitat.
2. Ahtna Inc. proposes the maintenance of D (1) withdrawals in areas where there are known and potential cultural sites. Tangle Lake Archaeological District is an important historical place to the Ahtna People, and we would like this area protected from mineral development.
3. Ahtna Inc. does not support the modification of Public Land Order 6329 that is included in Alternative D to allow for mineral entry in the Alphabet Hills area which has traditionally been used for hunting and is part of the migration corridor for the Nelchina Caribou Herd. Ahtna Inc. does not support the availability of the Alphabet Hills area to mineral leasing and it should be closed to such development activities.
4. Ahtna, Inc does not support D-1 lands being revoked and opened for minerals and oil & gas entry, since this will greatly affect our ability to sustain a subsistence lifestyle.

Please read our comments and take them into consideration, when you review D-1 Withdrawals.

Sincerely,

Linda Tyone, Chair

**COPPER COUNTRY ALLIANCE**

HC 60 Box 306T
Copper Center, Alaska 99573
Phone (907) 822-3644 Fax (907) 822-3644
e-mail cca@coppervalleyak.net

*"Protecting the rural and wild natural environment of the
Wrangell Mountains/Copper Basin region."*

September 15, 2005

Bureau of Land Management
Alaska State Office
Attn: Section 207 Congressional Report (AK-932)
222 West Seventh Avenue #13
Anchorage, Alaska 99513-7599

Dear BLM Staff:

Thank you for providing an opportunity to comment on d-1 withdrawals.

Copper Country Alliance is a 501(c)(3) conservation organization based in Alaska's Copper River Basin. Our members are concerned with the long-term maintenance of healthy ecosystems and rural lifestyles in the region. We have provided suggestions and comments at every step of the public process for the East Alaska Resource Management Plan (EARMP), which is nearing completion.

SUMMARY:

We believe that **no** d-1 withdrawals should be lifted...

1. until the 1876 Mining Law is updated;
2. until the United States government does its best to promote recycling and conservation, but still finds that a given mineral or petroleum resource is needed for the country's benefit;
3. as long as so many state lands are open to mining and oil and gas leasing;
4. until the BLM finishes its RMP process.

Some lands in the Glennallen BLM District (**d-1 Area Map # 1**) are so rich in other resources that they should **never** be opened to mineral or oil and gas entry. These include the following units being studied under the East Alaska RMP:

1. Delta Bison Calving Area of Critical Environmental Concern (ACEC)
2. Nelchina Caribou Calving ACEC
3. West Fork of the Gulkana River ACEC
4. Bering Glacier Resource Natural Area (RNA)
5. Delta River Special Recreation Management Area (SRMA)
6. Gulkana River SRMA
7. Delta Range SRMA
8. Denali Highway SRMA
9. Tielke SRMA

Other special areas in **d-1 Area Map #1** which should **never** be opened to mineral or oil and gas entry are:

1. Willow Mountain and Stuck Mountain
2. Eureka Summit/Gunsight Mt./Belanger Pass
3. Tonsina River Bluffs

DISCUSSION:

1876 Mining Law:

The Alaska Land Transfer Acceleration Act (ALTAA) requires BLM to determine if each d-1 withdrawal "...is still needed to protect the public interest in those lands." In the 129 years since the 1876 Mining Law was passed, the concept of "public interest" has changed considerably. Today, we recognize that public lands provide important services such as clean water, flood prevention (by wetlands), habitats for fish and wildlife, recreational opportunities, scenic beauty and wilderness. Large-scale mining, as currently practiced, generally impairs the ability of public lands to provide those services. It is not at all uncommon for mining companies to declare bankruptcy, leaving the cost of clean-up and restoration to the public. A number of "Superfund Sites" are abandoned mines. Furthermore, federal mining claims do not return back to the public a share of the public wealth that is removed from the ground. The only funds the U.S. government receives from hardrock mines is the annual claim maintenance fee of \$125 per claim, totaling about \$25 million per year. It is clear to us that the old law does not meet modern needs and conditions, and that it is detrimental to public lands and the public good for lands to be opened to mining under this archaic system.

Mineral and Petroleum Resources should be Extracted only When Necessary: A large share of the market for precious metals, such as gold and platinum, is for jewelry. Should landscapes be destroyed, should air and water be polluted, so that we can wear more ornaments? We think not. Our government also needs to do a better job of promoting and encouraging metal recycling and oil and gas conservation. It should require greater fuel efficiency and do more to promote public transit. Until then, resources are like "money in the bank". We will have them in times of true need rather than wasting them as we so often do at present.

Availability of State Lands:

Within the approximately 31-million-acre East Alaska planning area, only about 1.6 million acres are "unencumbered" BLM lands, meaning that they have not been selected by the State or by Native corporations. By contrast, 7 million acres have been conveyed to the State, and another 5.5 million acres have been State-selected. (Of those 5.5 million acres, 2.1 million acres have been dual selected by Native corporations, and another .006 million acres are on National Park Service-administered, rather than BLM-administered, lands.) After conveyances are completed--in only four years, if conveyances occur at the pace mandated by ALTAA--the State will control ample acreage for mineral and petroleum development, which the state government is encouraging. By and large, State selections were made for their mineral and oil and gas potential.

Federal lands, if they remain withdrawn, can provide a needed balance in land use, so that there will be wildlife habitats, subsistence opportunities and recreational opportunities, without the constant threat of those uses being lost to mineral and petroleum development.

Resource Management Plan Process:

The BLM is currently working on several in-depth resource management plans (RMPs). The East Alaska Resource Management Plan (EARMP) is nearing completion. Over the course of a couple years, public meetings have been held all over the planning area and beyond, to encourage public input. Copper Country Alliance took advantage of the opportunities to provide such input. A 1 ½ -inch-thick Plan and EIS is the latest product, and it analyzes four management alternatives. Copper Country Alliance favors Alternative C, the "Conservation Alternative", because we sincerely believe it comes

closer to the middle of a conservation/development scale, and will provide better long-term stewardship than Alternative D, the preferred alternative. Even though we take a different viewpoint than the BLM directorship on which alternative is best, we believe that the RMP process is the proper place for addressing the future of d-1 lands.

Areas which should never be opened to mining or oil and gas leasing:

We will confine our remarks to **d-1 Area Map # 1**. The following EARMF study areas are defined by BLM, so you will be able to determine which PLOs pertain to them. We request that d-1 withdrawals remain in place, with the recommendation that permanent closures to entry be made.

1. Delta Bison Calving ACEC: This area is proposed in order to encourage bison to remain for the longest period of time on public lands, rather than invading private agricultural lands. Being undisturbed by resource development on these lands would further that goal.
2. Nelchina Caribou Calving ACEC: Perhaps no biological resource in the EARMF is valued more by the public than the Nelchina Caribou Herd. Alaskans from Anchorage, Fairbanks, and other areas join Copper Basin residents (our members among them) in applying for permits to hunt these caribou. Other Alaskans and visitors enjoy viewing them. They are also an important part of the natural food chain. Protecting this herd on its calving grounds is essential to maintaining a healthy herd.
3. West Fork of the Gulkana River ACEC: This is an important breeding area for trumpeter swans and other waterfowl, and an important salmon spawning area.
4. Bering Glacier RNA: If adopted, this will be the only Research Natural Area in the region. To quote from the EARMF, "the entire Bering Glacier system is considered a national treasure and unique laboratory by researchers and scientists."
5. Delta River SRMA: This area includes the Delta Wild and Scenic River Corridor, comprised of the Tangle Lakes, Tangle River and much of the Delta River. The water bodies are clean and ideally-suited to float trips. The corridor lands are some of the region's most scenic. Tangle Lakes, in particular, is a favorite and long-used destination for many of our members.
6. Gulkana River SRMA: This area includes the Gulkana National Wild River. With its clear water, abundant salmon and scenic corridor, it is a popular float trip for many Alaskans and visitors.
7. Delta Range SRMA: This area is proposed for its scenic beauty and its long-standing popularity among hikers and skiers.
8. Denali Highway SRMA: This is a scenic treasure. Alaskans return here year after year for subsistence hunting, fishing, berry-picking, and many forms of recreation.
9. Tiekil SRMA: In addition to containing important wildlife habitat, this area is proposed because it can provide a great diversity of recreational experiences.

Additionally, we request that d-1 withdrawals (all in **d-1 Area Map #1**) remain in place in the following areas, and that permanent closures to entry eventually be made:

4. Willow Mountain and Stuck Mountain, west of about mile 88 of the Richardson Highway (PLO 5184): These are accessed by an existing hiking trail, and provide great panoramic views.
5. Eureka Summit/Gunsight Mt./Belanger Pass area of the Glenn Highway (PLO 5178): Caribou range here, and recreationists use this area extensively. Because the area is above treeline, mining or petroleum development would be highly visible.
6. Tonsina River Bluffs south of Edgerton Highway (PLO 5184): Hikers still use segments of an historic trail here. Not only are these segments the Kenny Lake community's "back yard", but visitors enjoy the trails, too. Additionally, commercial and non-commercial float trips occur on the Tonsina River. It is important to continue unimpaired use and views.

Again, thank you for this opportunity to comment on this important issue.

Sincerely,

COPPER COUNTRY ALLIANCE

A handwritten signature in cursive script that reads "Ruth McHenry".

Ruth McHenry, Staff



Cascadia Wildlands Project

Alaska Field Office

907.424.3835 • POB 853 • Cordova AK 99574 • cascadia@alaska.com • www.cascwild.org

Sept. 15
~~May 27~~, 2005

Dave Mushovic
BLM Alaska State Office
222 W. Seventh Ave., #13
Anchorage AK 99513-7599

Dear Mr. Mushovic,

Please consider the following preliminary comments, submitted on behalf of Cascadia Wildlands Project and myself as an individual, regarding the report to congress under Section 207 of the Alaska Land Transfer Acceleration Act.

Our primary interests in this report are conservation of public wildlands, and that an adequate public process be followed whatever decisions are made.

We urge that all d-1 withdrawals be maintained to protect the public interest, until the land in question is surveyed and classified through an adequate, public process as specified by BLM regulations and procedures.

The public has not been adequately notified of this action and the opportunity to comment on the Section 207 Report. The preparation of this report should have been noticed in the Federal Register, or some other systematic means. The current ad hoc approach may be well intentioned. But, based on our observation, it is inadequate.

Please release the draft report for public comment, prior to submitting it to Congress. Meaningful public comment is clearly impossible when the recommendations we are commenting on are not available.

Paragraph (2) of ALTAA, Section 207, requires public comment *on the review of withdrawals required in paragraph 1*. Public comment opportunity should come *after* the review and recommendations called for in paragraph 1, before the report to the Committees called for in paragraph 3. It is the review itself that is open to public comment, not the original withdrawals.

Necessary information is not available to adequately review the lands in question, for purposes of submitting comments under ALTAA Section 207(2). What are we commenting on? The only information being released is a packet of rough scale maps showing lands covered by Public Land Orders. It is monumental, given this information and the time allowed, to determine what impact withdrawals have on the land that would affect the public interest. It is very challenging to even surmise what the status of the land is. It is impossible to tell what withdrawals have any

practical impact, and which are just redundant paperwork. Most important, we are given no information at all concerning what recommendations are being prepared for congress.

The appropriate mechanism for lifting withdrawals, if the public interest demanded it, would appear to be the Resource Management Plan. To the extent that they conflict, the Resource Management Plan process that is currently underway across much of this land is undermined by the Section 207 review and report. We have commented to the BLM in the RMP process in regards to many of the d-1 withdrawals in south coastal Alaska, and expect our comments to be considered in that context. This RMP planning process would be severely undermined if any action were taken on the report. The purpose of the PLO's, which reserved these lands "for study and review by the Secretary of the Interior for the purpose of classification or reclassification..." (e.g. PLO 5176) is not met until the RMP process is complete.

The public interest would be violated by lifting any of these withdrawals outside of the orderly, inter-disciplinary, legally accountable RMP process. There is an inherent public interest in transparent, democratic decision-making, and in adequate study.

There is a great deal of confusion about the interrelation between the RMP process, and this Section 207 report, that has not been cleared up. At the recent RAC meeting here in Cordova, State Director Henri Bisson told a public commenter that commenting on the East Alaska RMP would negate any purpose in reviewing or commenting on this Section 207 report. However, the maps of (d)(1) withdrawals show additional lands segregated from entry under PLO 5176, that are within the East Alaska planning area, but that are not addressed in the East Alaska Management Plan. Included under the Section 207 report, but not EARMP, are ecologically, culturally and economic critical lands at Controller Bay, at Cape Suckling, Okalee Spit, and adjacent uplands.

d-1 withdrawals serve the public interest by conserving invaluable wildlands from irresponsible, speculative resource extraction, and by allowing orderly, wise use that is guided by an open, legally accountable and democratic public process. We support maintenance of all (d)1 withdrawals to protect the public interest.

We have attempted to identify some of the lands with outstanding wildland values that require mineral closure below. Please keep in mind this is necessarily a very partial list, which is only intended to offer a sample of the reasons why d-1 withdrawals should not be cut short.

AREA #1

- Cape Suckling/ Okalee Spit (PLO 5176)

This area has outstanding ecological values, including old growth rainforest, alpine tundra, and coastal mudflats that are a key staging area for migratory shorebirds. This is excellent moose habitat. Subsistence use area. Outstanding cultural values to indigenous Eyak and Tlingit people, including burial sites and villages. The cave where Raven was born is here. Shifting sandbars, earthquakes, and routinely furious storms make this dynamic region incredibly difficult and dangerous location for any development. Cape Suckling would be an ideal ACEC because of it's highly unique and irreplaceable cultural landscape, wildlife habitat, and extreme isolation and impracticality of development.

- Forelands and uplands of Bering Glacier, Bagley Ice Field (PLO 5176; 5186)

Most of this land is either covered in ice, or dominated by the advance and retreat of this chunk of ice which is bigger than the state of Rhode Island. This is literal Wilderness. There is no

remotely practicable mode of access for mineral exploration or development. If a method were found, it would come at immense ecological cost.

- Robinson Mountains (PLO 5176; 5186)

This is an extreme alpine and glacial landscape. Access is difficult to impossible. Even a small amount of exploration requires very extensive roadbuilding and port infrastructure. Any benefit would necessarily require a great deal of environmental damage through roads alone. Mountain goats in this area are already down 80%, reflecting extensive loss of winter habitat from logging on state and ANCSA corporation land. The Duktoth River is suitable and should be designated a Wild and Scenic River.

- Icy Bay (PLO 5176; 5186)

This is the flank of Mt. St. Elias, the highest coastal mountain in the world. Access is difficult to impossible. A budding tourism industry would be undercut by mineral exploration. Invaluable habitat for Kittlitz's murrelet, harbor seal, Orca and other marine mammals.

- Wrangell-St. Elias National Park & Preserve (PLO 5179; 5178; 5180)

We aren't at all clear what impact, if any, these PLOs have on the Park and Preserve, or inholdings. None of this area is suitable for federal mineral, oil or gas leasing. This area is part of the UN Biosphere Reserve network--the Wrangell St. Elias-Tatshenshini-Kluane..... Reserve. Included are headwaters of the Copper River Watershed, including culturally and commercially significant salmon runs.

- Gulkana River region (PLO 5178; 5184; 5172; 5180)

The Gulkana river, and the area wetlands, are invaluable habitat for swans and King salmon, among other critters. Even just recreational ATV use causes significant and lasting damage to these sensitive wetlands.

- uplands above Cordova (Power Creek-Ibeck Creek) (PLO 5176)

This area, above the small fishing town of Cordova, is a highly valued wildland and recreation area, which supports mountain goat, deer, brown and black bear, wolf, coyote, trout and salmon. This area includes old-growth spruce and hemlock rainforest, expansive wetland valleys and vast alpine areas. I went for a great hike here just the other day. This place is so important, it is the only place on the entire Chugach National Forest that was given a "Primitive" Prescription, and designated closed to motorized use. The Power Creek watershed has incredible recreation value, provides the town's power through a hydro generator, and is a critical spawning ground of Eyak salmon. Ibeck Creek is a immensely productive and popular stream for Coho salmon and trout. This creek is a substantial contributor to sport, subsistence, and commercial fisheries. These areas should be permanently closed to mineral entry.

Area 10 Cook Inlet- Bristol Bay

- Eastern Kenai Peninsula (PLO 5179; 5176)

With place names like "Paradise Valley," you can see that this area is a wildland recreation gem. Outstanding salmon spawning habitat. Kenai Brown Bear habitat. These are some of the few areas available for non-motorized recreation on the Kenai.

- Southern Kenai Peninsula (PLO 5176; 5174; 5180)

Much of this land is in Conservation, including designated Wilderness in Kenai National Wildlife Refuge, and Kenai Fiords National Park. Even the State of Alaska saw that this place is

beyond the ordinary, and designated the Kachemak Bay State Wilderness Park in this region. Development of any portion of this land, would severely compromise these conservation units.

- Portage Glacier (PLO 5180)

This is one of the state's most visited recreation sites. It is also critical wildlife habitat, including as a pinchpoint of land between the Kenai Peninsula and mainland of Alaska.

- Iliamna Lake Region (PLO 5180; 5184; 5179; 5174)

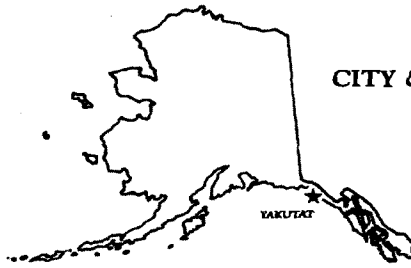
This is outrageously valuable wildlife and fish habitat. Subsistence use areas. What is the meaning of the PLO withdrawing the bottom of Iliamna Lake, in combination with the recordable disclaimer of interest recently filed on this land? The Bristol Bay Watersheds are the world's richest salmon fishery. Mining and drilling are not compatible with salmon.

Thanks for considering these preliminary comments. Again, we would very much appreciate the opportunity to comment on the Section 207 report itself.

Sincerely,



Gabriel Scott
Alaska Field Representative
Cascadia Wildlands Project



CITY & BOROUGH of YAKUTAT

P.O. Box 160
Yakutat, Alaska 99689
Phone (907) 784-3323
Fax (907) 784-3281

12 September 2005

To: BLM

Re: D1 Withdrawals within the City and Borough of Yakutat

This letter is in regard to the comment period on BLM D1 land withdrawals ending on September 15, 2005. The CBY staff has the following comments:

- 1.) ***Transportation corridors to the proposed withdrawal site need to be identified.*** The likely access to the proposed withdrawals is through the existing log Transfer Facility located in Icy Bay. The logical use of this LTF would be for docking mineral barges and/or oil/gas tankers. This is an unimproved site and would require extensive infrastructure to allow efficient entry. In addition, road building to the proposed site would be substantial and would necessitate following river valleys into the mountainous terrain and crossing lands not within BLM jurisdiction. Actual access to the mountains would require heavy blasting and side sloping to keep roads to grade. The activities associated with constructing access would have many effects upon aesthetic quality and fish and wildlife resources.
- 2.) ***Identification of Cultural and Historical sites within the withdrawal area and affected areas associated with resource extraction activities.*** This section supports the concerns of the Yakutat Tlingit Tribal planner. There should be a vigorous assessment of cultural resources in the proposed area and associated transportation corridors previous to recommending withdrawal of protections. There are many undocumented sites throughout the traditional lands of the Yakutat people. When projects are initiated, it has been our experience, that investigation and monitoring are not completed as thoroughly as might be expected, due to time constraints regarding economic efficiencies associated with the project.
- 3.) ***Identification of fish, wildlife, aesthetic and water resources affected by possible future activities of road construction, mining and drilling.*** The proposed withdrawal area and associated transportation corridors are highly valuable both economically and ecologically. There are several sport fishing and guiding businesses that operate within the surrounding areas that depend on abundant fish and wildlife populations of coho salmon, mountain goat, waterfowl, moose and bear. They sell the experience on the remote beauty of the area. In addition, the Icy Bay harbor seal haulout is the largest in the state and possibly the largest in the world hosting 5000 plus animals (Jansen, National Marine Mammal Lab, 2005 pers. communication). Furthermore, the US Fish and Wildlife service has identified a large abundance of Kittlitz murrelets in the waters of Icy bay (Michelle Kissling, USFWS, 2004). This species of murrelet is known to nest in glacial scree and the proposed D1 withdrawal may be a significant nesting area for this bird which is being considered as a candidate for the endangered species act.
- 4.) ***The City and Borough of Yakutat is not opposed to responsible resource development.*** However, the CBY Comprehensive Plan identifies this section of the Borough a "Natural Area". The preferred alternative would significantly alter this designation in the event that resource extraction activities occur. The BLM did not confer with the CBY planning department or Yakutat Tlingit Tribe on this proposal until repeated efforts were made on behalf of local staff to contact the BLM. In order to have a meaningful dialogue with the public, whose land is under



CITY & BOROUGH of YAKUTAT

P.O. Box 160
Yakutat, Alaska 99689
Phone (907) 784-3323
Fax (907) 784-3281

consideration, there should be a BLM community meeting held in Yakutat with all interested parties including the Yakutat Tlingit Tribe, Yak-Tat Kwaan and the CBY Assembly. This meeting should highlight the projected value of the resources located in the withdrawal zone, access and transportation issues, social affects of large mining/drilling activities and the relationship between offshore, inshore and d1 land leases. Furthermore, the gas resources that extend from Yakutat to Cordova are a potential alternative power source for both communities. There may be more value and less impact by tapping these resources for local use. If large scale natural/methane gas extraction efforts in the northern half of the bureau are to be initiated, there should be allowances for both the communities of Yakutat and Cordova to access deposits close to their respective towns.

Thank you for your consideration,

Steve Henry
s// Steve Henry
City Manager

A handwritten signature in dark ink, appearing to be "SH", written over a horizontal line.

Skip Ryman
s// Skip Ryman
Borough Planner

A handwritten signature in dark ink, appearing to be "S. Ryman", written over a horizontal line.

Bill Lucey
s// Bill Lucey
Staff Biologist

A handwritten signature in dark ink, appearing to be "Bill Lucey", written over a horizontal line.