

DNR - Mining, Land & Water Online Public Comment

Bristol Bay Area Plan Amendment 2012

Topic: Bristol Bay Area Plan Amendment 2012

Comment 1 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 2 of 497 - submitted on 04/28/2013 at 04:12 PM:

Please protect the waterways of Bristol Bay, which has such a rich salmon fishery. The fishing industry is very important to the state, and opening this area to mining could devastate it.

Comment 3 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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Comment 6 of 497 - submitted on 04/19/2013 at 12:00 AM:

I was born in Togiak, Alaska, 'Tuyuryak' in Yup'ik Eskimo, and my late parent's Thomas 'Tom' and Naomi Chythlook moved in the early 1950's to Aleknagik, Alaska so the family children can get an education but yet continue our traditional subsistence way of life. Our main livelihood remains to the present time, of harvesting all salmon species beginning mid-May through September annually. The salmon fish has been our traditional sustenance staple food and some species was dried for our dog team when I was a young child. Our family had two fish racks going for two months or more during the summer drying salmon, herring fish, lake trout, Northern pike, Dolly varden, and all other freshwater fish species.

The Chythlook family are Yup'ik Eskimos who have historical traditional use of the marine ecosystem habitat areas, and it's freshwater rivers and freshwater lake tributaries since the early 1950's in the Bristol Bay, Alaska area encompassing from Lake Aleknagik, Alaska all the way to the Tikchik Lakes area as a traditional large land animal hunting, trapping fur bearing animals, freshwater fish harvesting, and gathering edible wild berries, plants, and harvesting all waterfowl, and eggs as part of our traditional foods, and extending to Nushagak Bay area. The traditional subsistence resource harvest cycle was year-round for our late parent's and all nine children participated in living off the land, the sea, freshwater rivers, and freshwater lake tributaries from all the waters including lake system, river tributaries, streams, ponds, and creeks including the tundra fauna and vegetation habitat areas which is presently known as the Wood Tikchik State Park. In our present traditional Yup'ik Eskimo way of life, which includes traditional subsistence harvesting, processing activities of everything we get from the land, the sea, and freshwater lake systems, streams, creeks, ponds, and tundra flora, including edible vegetation, we do not set any boundaries of where we harvest our traditional year-round subsistence resources in the Wood-Tikchik State Park system, Nushagak Bay, Cape Constantine, Walrus Islands, Togiak Bay, Cape Newenham, Cape Peirce, all the way to Security Cove and beyond. The availability of the traditional marine ecosystem subsistence food resources are far and near depending on the type of marine mammals, waterfowl, seabirds, and all fish species and roe we harvest, that's why the areas are mentioned within Bristol Bay and beyond. Part of our traditional culture is to barter and trade for traditional food resources not available in for example, Aleknagik, Alaska. Our traditional culture is to share what we have with other Alaska Natives who are unable to hunt and gather traditional foods due to illness, disabled, or elderly, or do not have a traditional provider. We have traded marine foods and harvested foods as far as the Lake Iliamna tribal communities.

I recommend the 1984 original Bristol Bay Regional Plan remains as is with additional tribal and Bristol Bay, Alaska resident recommendations. As I said, the salmon is our staple food, and they start migrating from the Wood River systems, the Nushagak River systems, and the Kvichak River systems between early May to June every year to live as juvenile salmon in the Bays. I do not support any mining and oil development, as the toxic waste can seep through the fragile permafrost spongy tundra flora ruining our traditional edible berries, and lichen, which is also food source for caribou harvested by all Bristol Bay residents. The environmentalists need to consider climate changes which have caused unusual extreme storms, and heavy rains which have affected the freshwater lake streams where salmon spawning habitats are. The recent heavy rains have strong currents, which have caused flash floods washing some fragile salmon egg habitat areas. If the Pebble Mine, for example is developed, it will be an environmental threat to our tribal communities and all in-land watershed areas harming fragile tundra flora dependent as food for human and large land animals.

To this day, our Alaska Native people travel to harvest their food resources throughout the Bristol Bay and we want to continue to preserve our traditional way of life to freely harvest our marine mammals, all salmon species both in freshwater tributaries, and in the marine ecosystem habitat areas into the millennia.

Comment 7 of 497 - submitted on 05/01/2013 at 10:53 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I visit Bristol Bay. When I first came to see Bristol Bay in the 1980's, I realized that this area was the most beautiful place on earth. I have come back to Alaska

and more specifically Bristol Bay on a regular basis. Please consider a broader approach to the Bristol Bay Area Plan. This is important. As this is one of the last remaining pristine places in the world, an important source of revenue in the salmon fishing industry, I urge you to broaden the approach and protect this most valuable of Alaska's assets. Once you cut away at this area, you can never recover it. This is the most important salmon fishing area in the world and once it is gone, it will never, ever return. Please protect Bristol Bay!!!

Thank you!

Patricia M. Ahneman Jr.

Comment 8 of 497 - submitted on 05/05/2013 at 12:00 AM:

Comments from the Nushagak-Mulchatna Watershed Council to the Department of Natural Resources on the 2005 Bristol Bay Area Plan for State Lands (BBAP) and the 2013 Proposed Amendments

The Nushagak-Mulchatna Watershed Council was formed in 2000 and represents those municipalities, tribal governments, Alaska Native corporations and other organizations working together to foster stewardship of the lands and waters of the Nushagak River Watershed.

In general, the Watershed Council does not consider the 2005 BBAP sufficiently protective of the waters and natural resources of our watershed. The 2005 BBAP represents a significant and unjustified departure from the original 1984 BBAP. Unlike other area plan changes undertaken by DNR, the 2005 BBAP does not start with the previous plan as a foundation. Rather, the 2005 BBAP effectively ignores the 1984 BBAP by changing the emphasis from protecting habitat for fish and wildlife, salmon in particular, to a plan intended to foster mineral development. The proposed 2013 amendments, while providing more habitat protections, do not restore the foundation of stewardship that was fundamental to the 1984 BBAP. For that reason the Nushagak-Mulchatna Watershed Council recommends the Department discard the 2005 BBAP in its entirety and start over. To assist with that effort the people of the region have prepared a Citizens' Alternative BBAP. A copy of that plan has been submitted to you. The Council strongly urges the State to take this alternative plan seriously and consider it in the spirit of cooperation in which it is offered.

The Department is now well aware the people of the Nushagak River watershed do not support the 2005 BBAP. The comments received during public hearings in the communities of the watershed clearly indicate a desire for a plan that protects habitat, protects subsistence, protects water quality, protects salmon and is responsive to the input from the people who live here. Rather than repeat those comments, let it be enough to say the Council generally endorses them. Instead, the Council would like to make specific comments regarding the Citizen's Alternative in relation to the 2005 BBAP. We do so in the context of work the Council has supported since the 2005 BBAP was adopted.

Nushagak River Watershed Traditional Use Area Conservation Plan

The Nushagak River Watershed Traditional Use Area Conservation Plan or TUACP was adopted by the Council in 2007 after two years of research and assessment that began with traditional knowledge surveys and mapping sessions in the communities of the watershed. The TUACP was updated in 2012. The development and implementation of the TUACP has been recognized as a seminal conservation effort. The Watershed Council TUACP was a finalist for the 2012 Theiss International River Prize held in Melbourne, Australia and received special recognition by the International River Foundation. The TUACP also received the 2012 Outstanding Achievement Award of the Alaska Forum on the Environment. A digital copy of the TUACP on disk was provided to the State by the drafting committee for the Citizens' Alternative BBAP. Many of the recommendations offered in the Citizens' Alternative derive from work undertaken for the TUACP, some of these recommendations follow:

Habitat / Subsistence / Recreation Classifications. The TUACP support the analysis of management units in the Nushagak River watershed in the Citizens' Alternative. There is more than enough data to support returning to classifications that protect habitat and activities that rely on the availability of habitat.

The vast majority of State lands in the watershed classified as "Habitat" in 1984 were changed to a "General Use" classification in 2005. General Use (Gu) land is defined as:

. . . land that contains a variety of resources, none of which is of sufficiently high value to merit designation as a primary use or is large enough to accommodate a variety of uses with appropriate siting and design considerations. General Use may also apply where there is a lack of resource, economic, or other information with which to assign a specific land use designation and/or where there is a lack of current demand implying that development is unlikely within the planning period.

The traditional knowledge maps created by the Council from traditional knowledge data obtained in 2005 and 2006 demonstrate that in the 20 years between 1984 and 2005 nothing of substance occurred to alter the high value of the habitat of the watershed. Where moose and caribou roamed in 1984 □ moose and caribou roamed in 2005; where salmon spawned and reared in 1984 □ salmon spawned and reared in 2005; where people hunted and fished in 1984 □ people hunted and fished in 2005. In fact, with respect to hunting and fishing the subsistence use of species has not diminished and recreational use has increased substantially. Further, improvements in technology since 1984, particularly in snow machines and outboard jet units, have made uplands and shallow waters more accessible. Composite traditional knowledge maps are in the appendix to the TUACP.

In addition to the information obtained in the TUACP, other sources also clearly demonstrate the inappropriate use of the Gu classification for lands in the Nushagak River watershed.

- Research conducted by ADF&G, USF&WS and the Lake Clark National Park and Preserve confirm the continued use of the Nushagak River watershed for wintering and calving caribou from the Mulchatna herd.

http://science.nature.nps.gov/im/units/swan/assets/docs/reports/presentations/Symposium2011/wildlife_presentations/NDehma_Mulchatna_Caribou_SWAK_SciSymp_20111104.pdf

- Between 2004 and 2008 The Pebble Partnership undertook extensive studies of the subsistence and recreational use of resources in the Nushagak River watershed. These studies confirm the continued importance of healthy habitat to the subsistence users of the watershed and to the vibrant sport hunting and fishing community. See in particular the Pebble Project Environmental Baseline Document <http://www.pebblesearch.com> Chapter 23 entitled Subsistence Uses and Traditional Knowledge (Bristol Bay Drainages) and Chapter 25 entitled Recreation (Bristol Bay Drainages).

Water Resources Land Classification (Wr). The Citizens' Alternative proposes that all lands that have been classified as Habitat (Ha) by that plan also be co-classified as Water Resources Land (Wr). This classification is used to designate lands that encompass watersheds or portions of watersheds suitable for water supply, watershed protection and hydropower sites. In the Citizens' Alternative this includes headwaters and wetlands. The Council supports this classification as nearly every 6th level HUC watershed in Region 6 produces salmon. See Appendix F to the Citizens' Alternative. Research conducted by the University of Washington in Bristol Bay suggests this productivity is likely attributable to the undisturbed and complex array of headwaters and wetlands to which the salmon the Nushagak River basin have adapted. See Schlindler, et, al. Population Diversity and the Portfolio Effect in an Exploited Species, Nature, pp 609 □ 612 (June 3, 2010).

Since 1984 there has been much more research added to the scientific literature on wild salmon populations. While this research has increased our understanding of salmon, it also suggests there is much we do not know about the sensitivity of this creature to changes in the freshwater habitat that fosters new generations. Our focus in Bristol Bay should not be on managing land as distinct from water, but on maintaining the interaction between land and water. Our understanding of this relationship may be imperfect, but this weakness suggests we err on the side of caution. A Water Resources Land classification for most State lands in the Nushagak and Kvichak watersheds would be the best available expression of this caution.

Special Note: A goal of maintaining the interaction between land and water may not be well served by the boundaries of management units as they are currently drawn for regions 5 through 10. The Council recommends that DNR rethink management unit boundaries and design them around watersheds. The map provided at Appendix F to the Citizens' □ Alternative suggests that 6th level hydrologic units may be the appropriate foundation for re-drawing management unit boundaries.

Anadromous Waters Protection. The Citizens' Alternative recommends four specific actions to protect anadromous waters in Bristol Bay □ 1) Habitat classifications for all anadromous waters regardless of navigability; 2) restoration of the 1984 areawide instream flow reservation for anadromous waters; 3) an additional mineral closing order for anadromous streams not included in MCO 393 that conflict with mineral prospects; and 4) all waters in Bristol Bay should be presumed anadromous for purposes of any permit applications to disturb them. These recommendations are supported by the following research:

- Between 2008 and 2010 The Nature Conservancy, on behalf of the Watershed Council, conducted fish distribution surveys in the vicinity of the mineralized area around the Pebble prospect adding more than 100 miles to the Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes. (AWC) The report, Fish Surveys in Headwater Streams of the Nushagak and Kvichak River Drainages in Bristol Bay, Alaska 2008 □ 2012, can be found at <http://www.bristolbaylandtrust.org/wp-content/uploads/2013/04/Pebble-Area-Fish-Surveys-2008-2010.pdf>

- In 2010 the Bristol Bay Heritage Land Trust conducted fish distribution surveys in the vicinity of Kemuk Mountain and the Humble prospect and added nearly 70 miles to the AWC. A map of the additions can be found at <http://www.bristolbaylandtrust.org/wp-content/uploads/2013/04/Kemuk-Mtn-Area-Fish-Surveys-2011.pdf>

- Between 2003 and 2006 ADF&G conducted extensive fish distribution surveys in the Nushagak River Watershed adding more than 1,288 miles to the AWC. In 2003 the AWC recorded 1,965 miles of anadromous streams in the Nushagak River Watershed. That effort also confirmed the extensive distribution of resident fish species. See the maps submitted with this letter. Since 2003 ADF&G and others have nearly doubled our knowledge of anadromous streams in the watershed. (Wiedmer 2003; Wiedmer 2005; Wiedmer 2006)

Many of the additions to the AWC since 1984 and most of the additions since 2005 made by these referenced studies were for streams that are not navigable. The presumption of anadromy is supported by the simple observation derived from these studies that salmon were found in nearly 75% of streams surveyed that had a 10% gradient or less. Fish, including in many cases potentially anadromous Dolly Varden, were found in 98% of streams surveyed. To adequately protect salmon in Bristol Bay persons issued permits to work in or near any stream should be required to conduct their activities in accordance with ADF&G protocols for protecting anadromous fish, unless the applicant can demonstrate the stream is not anadromous or the gradient is greater than 10%.

DNR Commissioner Esther Wunicke noted in the justification for Mineral Closing Order 393 that "Actual closings more effectively and efficiently achieve the level of fisheries protection required." The greatest change in land use and potential impact to fisheries in Bristol Bay since 1984 has been the proliferation of mining claims. Despite this obvious change and the fact that many of these claims conflict with streams added to the Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes since 1984, the 2005 BBAP did not recommend any additional closing orders. This failure is inconsistent with MCO 393. The Citizens' Alternative does recommend additional streams for closure. Many of these streams were documented as anadromous by the research listed above. DNR should use its 640 acre limitation to close as many of these streams as possible that conflict with known mineral prospects and recommend additional closures to the legislature.

Mineral Classifications. The 1984 BBAP co-classified several areas in the Nushagak River Watershed as Habitat and Mineral. The 2005 BBAP removed these co-classification and reclassified four management units as solely Mineral (Mi) □ Pebble, Sleitat, Shotgun and Kemuk. This reclassification was not justified by the evidence available in 2005 and does not stand up to the evidence cited above that demonstrates these areas still contain essential habitat for moose, caribou and salmon and are heavily used for subsistence and recreation. At a minimum these four areas warrant co-classifications of Habitat (Ha) and Public Recreation (Rd).

However, the Council endorses the position of the Citizens' Alternative that classifying or co-classifying any of these areas as Mineral is premature and likely illegally presumptive. According to 11 AAC 55.130 mineral land is "land where known mineral resources exist and where development is occurring or is reasonably likely to occur, or where there is reason to believe that commercial quantities of minerals exist." (Emphasis added). Development has not been permitted in any of these management units and none of the companies exploring in these units has demonstrated that development is reasonably likely to occur. The commercial viability of any mineral deposit is not certain until permit applications have been filed and granted. Because all state lands are open to mineral claim and exploration the Mineral classification is redundant. State land should become mineral land only upon the approval of permits to develop and approval of a petition for a plan amendment to reclassify the land to be mined to mineral only.

Standards for Responsible Mining. The Watershed Council endorses the standards for responsible mining set out in the Citizens' Alternative Bristol Bay Area Plan, Chapter 2 - Mineral Resources □ Management Guidelines. These standards come directly from a statement made by the Watershed Council in 2011 entitled Standards and Practices for Environmentally Responsible Mining in the Nushagak River Watershed. <http://www.bristolbaylandtrust.org/wp-content/uploads/2012/12/Standards-and-Practices-for-Mining-.pdf>

Many of the guidelines set forth in this document were adapted from industry, in particular the Ten Principles of Sustainable Development Framework adopted by the International Council on Mining and Minerals, <http://www.icmm.com/our-work/sustainable-development-framework/10-principles>; and A Framework for Responsible Mining: A Guide to Evolving Standards, Marta Miranda, David Chambers, and Catherine Coumans (October 19, 2005). <http://www.csp2.org/reports/Framework%20for%20Responsible%20Mining.pdf>

Prohibition of Metallic Sulfide Mines in the Nushagak and Kvichak Watersheds. The Citizens' Alternative recommends the prohibition of metallic sulfide mines in the Nushagak and Kvichak watersheds. The application of strict standards may

be sufficient to protect the renewable resources of Bristol Bay from most mining impacts. However, standards may not be sufficient in the Nushagak and Kvichak watersheds given the important resources at risk, in particular the globally significant productivity of salmon from these watersheds.

Two studies undertaken by the Nature Conservancy with support from the Watershed Council underscore this concern. Given the application of the precautionary principle, also recommended by the Citizens' Alternative, the most effective and efficient means for protecting the renewable resources of these watersheds is to prohibit these kinds of unusually destructive mines altogether.

- In 2010 the Nature Conservancy released a study two years in the making entitled An Assessment of Ecological Risk to Wild Salmon Systems from Large-scale Mining in the Nushagak and Kvichak Watersheds of the Bristol Bay Basin, Ecology & Environment, (October, 2010). The results of the study strongly suggest that metallic sulfide mines have unavoidable risks with uncertain consequences that will be eternally present

<http://www.nature.org/ourinitiatives/regions/northamerica/unitedstates/alaska/explore/ecological-risk-assessment-nushagak-kvichak.pdf>

A summary of this report and the implications it draws for salmon in Bristol Bay can be found at

http://www.nature.org/idc/groups/webcontent/@web/@alaska/documents/document/prd_046281.pdf

- In 2010 the Nature Conservancy conducted another study to determine whether the waters around the Pebble deposit can adequately buffer fish from any toxic releases of copper. In particular, the study examined the likely predictive value of the EPA standard biotic ligand model (BLM). The report concluded that the chemical characteristic of the water tested strongly suggests the water at the Pebble deposit has little capacity to buffer the toxic affects to fish associated with increases in copper concentrations:

The results of our study indicate that surface water streams near the Pebble deposit can be characterized as having low hardness, alkalinity, Ca, Cu, and DOC concentrations. The low measured concentrations of parameters that potentially ameliorate metal toxicity suggest that Cu (and other metals) is likely to be highly toxic to aquatic biota in this region. Although the natural organic matter measured in streams close to the Pebble deposit contains some organic ligands with high Cu binding affinity, the concentrations of these high-affinity ligands in the natural DOM is low. An increase in the Cu concentration while keeping the DOC or DOM constant (i.e., increase Cu:DOM ratios), as would be likely to occur during mining (no DOM is added to streams during mining), will reduce the net binding affinity of natural DOM by shunting added Cu to ligands with lower binding strengths. As a consequence of this relationship, natural DOM is unlikely to be strongly protective against Cu toxicity to aquatic organisms. Moreover, our findings indicate that DOM from streams around the Pebble Project has a lower net Cu binding ability than predicted by the BLM. The results from this study suggest that using the BLM will underestimate Cu toxicity to resident salmonids and other aquatic biota.

The report entitled: Laboratory Estimation of Cu-Dissolved Organic Matter Complexation and Its Relevance to Fish Toxicity in Streams Draining the Pebble Deposit in Alaska is submitted with these comments.

Both of these studies strongly suggest that the acid generated from mining sulfide deposits in the Nushagak and Kvichak watersheds will release copper and other toxic metals into the surrounding waters and that salmon spawning, rearing or migrating through these waters will be mortally affected. Accordingly, in the absence of clear and convincing evidence to the contrary, the application of the precautionary principle supports a total ban on this type of mining in these watersheds.

In conclusion the Watershed Council urges DNR to review the Nushagak River Watershed Traditional Use Area Conservation Plan as updated in 2011 and incorporate the traditional knowledge captured by that plan into the management of State lands within the Nushagak watershed. The Council also refers DNR to the Strategic Conservation Action Plan for Bristol Bay Watersheds adopted in 2011 by the Southwest Alaska Salmon Habitat Partnership. This plan was prepared with the assistance of fisheries biologists from ADF&G and federal agencies and land managers in Bristol Bay. The conservation strategies incorporated in each of these plans informed the development of the Citizens' Alternative Bristol Bay Area Plan. The Watershed Council endorses the Citizens' Alternative not because it is the best possible plan. Rather the Council endorses the Citizens' Alternative largely because it takes advantage of the local knowledge, the science and reasoning underlying these two complementary conservation plans.

Thank you for the opportunity to submit these comments.

Attachments: Maps - Nushagak Watershed fish distribution; Copper Bioavailability Report

Comment 9 of 497 - submitted on 03/18/2013 at 12:00 AM:

RESOLUTION 2013-008

A Resolution requesting that the Department of Natural Resources incorporate all matters specified below into its 2013 Revised Bristol Bay Area Plan, and supporting the Citizen's Alternative Bristol Bay Area Plan, and requesting public meetings and hearings.

WHEREAS, The Ekwok Village Council (EVC) is the federally recognized Alaska Native tribe serving its tribal members and the community of Ekwok; and

WHEREAS, EVC, acting as the duly elected governing body pursuant to the Constitution of EVC, has the authority to establish relationships and enter into contracts; and

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat □

- (1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Kaktuli River, the Upper Talarik River, and eight streams to south of Pebble block,
- (2) navigable anadromous waters in their entirety, including the South Fork of the Kaktuli River to Frying Pan Lake;
- (3) moose calving and some wintering areas to include the North and South Forks of the Kaktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has-

- (1) declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) declined to classify non-navigable anadromous waters as habitat;
- (3) declined to classify much of the moose wintering areas as habitat; and
- (4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, The EVC expects that the Department of Natural Resources will incorporate the other considerations of the EVC in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvichak drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"

(11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the EVC requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the EVC supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the EVC requests that the Department of Natural Resources join with the tribal councils in holding public meetings on both DNR's proposed changes and the Citizen's Alternative in the villages that sued DNR as soon as possible, and in other communities.

CERTIFICATION:

I, the undersigned Secretary of the Ekwok Village Council, do hereby certify that EVC officials passed the foregoing resolution at a duly called and noticed meeting on this 6 day of March, 2013, and that a quorum was present with 7 yes, 0 no, and 0 abstain votes.

Comment 10 of 497 - submitted on 04/01/2013 at 12:00 AM:

Nunamta Aulukestai ("Nunamta") comprises directors appointed by ten tribes and ten Native Corporations, including Ekwok Village Council, New Koliganek Village Council, Clarks Point Village Council, Aleknagik Traditional Council, Curyung Tribal Council, New Stuyahok Traditional Council, Manakotak Village Council, Togiak Traditional Council, Levelock Village Council, Twin Hills Village Council, Ekwok Natives Limited, Koliganek Natives Limited, Saguyak Inc., Aleknagik Natives Limited, Choggiung Limited, Stuyahok Limited, Manakotak Natives Limited, Togiak Natives Limited, Levelock Natives Limited and, Twin Hills Native Corporation. Nunamta represents approximately 6,014 tribal members and 4,775 shareholders from the Bristol Bay region who rely on the land, fish, wildlife, cultural resources and waters of the region for subsistence and their cultural way of life. Since its founding in 2006, Nunamta has actively advocated to protect the natural resources of Bristol Bay from the threats to those resources, namely offshore oil and gas development in Bristol Bay and the proposed Pebble Mine.

Nunamta has worked to give the people of Bristol Bay a voice in the proposed development of extractive industries that can severely impact our subsistence and cultural way of life. For us, our food security is not something that should be jeopardized or risked over an extractive industry that offers short term employment but long term monitoring of contaminants into millennium. Nunamta supports the efforts of our directors who with their own elected tribal governments in their community formally petitioned the Environmental Protection Agency (EPA) to take action under the Clean Water Act, Section 404C.

We support EPA's Bristol Bay Watershed Assessment and actively worked in June, 2012 with EPA staff in six Bristol Bay communities to make sure that the voices of Bristol Bay participated and testified during the initial round of hearings to provide in their own words why they support the draft BB Watershed Assessment. We participated in the public comment period during the Peer Review stage of the watershed assessment. We've met many times with EPA staff and our congressional delegation to get a sense of when the watershed assessment would become a finalized document within EPA. We've heard from EPA that the watershed assessment would go to the peer review members and once again go out for public comment. We support EPA's efforts to have a scientifically sound document that goes beyond fault, however we request that the watershed assessment be released for public comment as soon as possible in order to see the public comment period wrapped up before we start the busy summer season of fishing.

We not only work with the federal government to protect our lands and waters for future generations but watched with disbelief and the shaking of our heads as the State of Alaska started a round of meetings in the region on the draft Bristol Bay Area Plan. With an advance notice of five days and notice that public comment would be taken, the people of Bristol Bay attended and discovered that their public comments would not go into the official record. Another sad reminder that we can't rely on the State of Alaska to listen, act in good faith, nor follow their own rules in their own public process. This adds to the list of reasons why the people of Bristol Bay need EPA to finalize the Bristol Bay Watershed Assessment and move to ensure that Bristol Bay's habitat is protected.

Sincerely

Comment 11 of 497 - submitted on 05/01/2013 at 10:22 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational

fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I work in Bristol Bay.

Comment 12 of 497 - submitted on 05/03/2013 at 06:39 AM:

Why destroy a renewable resource (salmon) for a mine that will only mine for X number of years? 100 years (or even longer) from now we will understand how bad of choice we made to even consider this, unless you are an offspring of one of the mining executives or lobbyist.

Comment 13 of 497 - submitted on 05/01/2013 at 04:53 PM:

Please consider the dire consequences that this mine would have on the environment and the people of Alaska. It will impact tourism at such a heavy level and only pollute many of the rivers and streams that we fish out of and drink from. Do what's right and listen to the people and sign NO to Pebble Mine.

Comment 14 of 497 - submitted on 05/03/2013 at 12:00 AM:

Thank you for the opportunity to comment on the proposed amendments to the Bristol Bay Area Plan. The Borough has a number of comments on the proposed amendments. However, I would like to begin the comments by identifying some of the principles that influence our comments.

Support for Subsistence and Responsible Economic Development. We realize that DNR does not regulate subsistence. Fishing and hunting regulations are set through the Department of Fish and Game's board processes. DNR cannot change who is allowed to fish and hunt on state land, or how one may do it. However, subsistence values are important to the Borough. They provide an important background to our comments, and it is useful to explain our values.

- Subsistence is critical to our people and villages. Subsistence - the ability for our residents to hunt, fish, and gather local resources - is critical to our culture, our communities, and our health. We cannot compromise our access to hunting grounds, the health of fish and wildlife populations, or the quality of the habitat that supports the populations.

Subsistence is an essential part of our culture. It is sometimes difficult for those who live elsewhere to appreciate the importance, but it is a part of the fabric of our lives and beliefs.

Subsistence is a crucial part of our economy. Food and energy are very expensive in the Lake and Peninsula Borough. We survive by eating good quality food that is provided locally through subsistence. It is an economic necessity as well as a culture imperative. Also, subsistence includes more than fish and wildlife. It may include gathering berries, firewood, or whatever local resources are used by nearby villages.

Our stance on the proposed Pebble Mine, which reads in part that we will not trade our fish for a mine, is motivated by the importance of subsistence to our villages.

- Responsible economic development is also critical to our people and villages. While our residents cannot live without subsistence, we also cannot live on subsistence alone. We live in a mixed subsistence/cash economy. We all purchase gas, food, and energy. Even our subsistence activities require money for boats, snowmobiles, and fuel. Our villages need jobs and income to survive, and we need those same jobs and income so that our children will stay here or return. Without appropriate economic opportunities, residents will be forced from the villages. The decade-old school closure at Ivanof Bay, the recent loss of the Pedro Bay School, and precarious school populations in some of our other villages remind us of the need for economic opportunity to support our residents.

Our need for both subsistence and economic opportunity causes us to support responsible economic development. We support economic development that can occur consistent with our lifestyles and with the habitat and populations of fish and wildlife. The area plan must protect this balance.

Support for Local Control and Municipal Entitlements. We believe in the ability of our people to manage our lands. We believe that Borough residents should make decisions about our society and lands.

After the Lake and Peninsula Borough was formed, the legislature granted us 125,000 acres in municipal entitlements to help us achieve a greater measure of local control. Unfortunately, DNR's 1984 Area Plan, which was adopted before the Borough existed, placed essentially all state land in the Borough off-limits to municipal selection. Unlike other boroughs in Alaska and despite the 125,000-acre legislative grant, the Lake and Peninsula Borough could not gain title to our acreage and to the corresponding income and local control. DNR amended the plan in 2005, and the Borough finally - 16 years after we were formed - could select our promised land. Since that time DNR has approved almost 84,000 acres, we still have a little over 40,000 left. The present amendment allows DNR to approve further acreage to the Borough. Any

changes to the amendment must respect the Legislature's promise made to us when we incorporated our Borough: that we may finish our selections.

Specific Comments on the Bristol Bay Area Plan Amendments

The Plan Needs an Area-wide Subsistence Guideline. Because of the importance of subsistence to our residents, we believe that DNR should consider subsistence impacts in all of its decisions within our Borough. While DNR does not regulate subsistence, its decisions may affect local village use of subsistence resources. Therefore, subsistence impacts need to be considered in DNR's decisions no matter what the land's designation or classification - habitat, settlement, minerals, etc. We recognize that changing from one multiple-use label to another does not necessarily change the rules for a DNR decision. But a specific area-wide guideline does make a change for DNR's decisions everywhere in the planning area. For that reason, we recommend a subsistence protection guideline be added the area-wide guidelines of Chapter 2. Specifically, we recommend the following:

Protection for Subsistence Access and Harvest. In all DNR decisions including issuing permits, leases, or otherwise authorizing the use or development of state land, DNR will consider the decision's effects upon access to subsistence resources by local villagers. Examples of these effects could include degrading physical access by villagers, significantly changing locations where wildlife populations are located, or creating undue competition in locations frequently used by local villages.

For any decision with a potential adverse impact on local village use of fish, wildlife, or other subsistence resources, DNR will, to the extent feasible and prudent, require that the activity be designed to avoid, minimize, or mitigate significant adverse impacts to the local use.

Maintain the Borough's ability to acquire its Municipal Entitlement. In any changes to the area plan, DNR must maintain the Borough's ability to acquire the municipal entitlement acreage granted by the Legislature. Any blanket change that eliminates that ability would seem to be inconsistent with legislative intent and possibly illegal.

Addition to Moose Calving and Wintering Habitat in the Copper and Kokhanok River Drainages. Individuals from the Pope-Vannoy and Kokhanok areas have told us that there is moose calving and wintering habitat in the Copper and Kokhanok River drainages within Management Units R09-07 and R09-08. Some of that habitat is documented in the "Resources, Uses" column in the plan, but some is not. In general, the moose winter habitat includes most of the lower elevations of the Copper and Kokhanok River watersheds up to approximately the 400-foot contour and extending to the lower part of Moose Lake and somewhat above that elevation to the lower part of Meadow Lake. This information should be added to the "Resources, Uses" column for those two subunits.

Because much of that area is subject to municipal entitlement application ADL 227016, we do not necessarily recommend that the classification be changed to Habitat. Whatever the classification, we recommend that the management intent in those two units should include the following language. "Authorizations within the lower areas of the Copper and Kokhanok River drainages will avoid significant winter disturbance to areas used for moose calving and winter habitat, and avoid activities that will significantly degrade the ability of moose to use the area for these purposes."

Thank you for the opportunity to comment. Please contact me if you need further information.

Sincerely

Comment 15 of 497 - submitted on 05/06/2013 at 12:00 AM:

The Bristol Bay Native Association (BBNA) is a tribal consortium of 31 tribes in the Bristol Bay region of Alaska. Our region covers an area about the size of the State of Ohio. BBNA was formally incorporated in 1973; however our organization's roots predate the Alaska Native Claims Settlement Act (ANCSA). BBNA and its member tribes have been involved in land use planning and natural resource management prior to ANCSA. Today we continue working collectively with our tribes and partnering organizations to protect the lands and natural ecosystem of Bristol Bay as well as support subsistence opportunities for the people of our region.

BBNA supported the 1984 Bristol Bay Area Plan as its habitat classifications provided protection of the subsistence resources that residents of our region depend upon. Development of the 1984 BBAP included numerous stakeholder meetings in our region and incorporated public input into the final plan. Unfortunately, the 2005 BBAP rewrite was done not only without meaningful public involvement but also effectively ignored the 1984 BBAP by changing the plan's emphasis from protecting fish and wildlife habitat to a plan that fosters mineral development. As such, the Alaska

Department of Natural Resources was sued by a plaintiff group which included six BBNA member tribes which has ultimately resulted in the public comment period we are submitting today.

At its March 2013 meeting, BBNA's Board of Directors adopted Resolution 2013-03 "A Resolution in support of the Citizens' Alternative Bristol Bay Area Plan and requesting public meetings in Bristol Bay." A copy of Resolution 2013-03 is attached. I request it be included with this letter in our public comments.

BBNA is glad DNR hosted public hearings on the latest revisions in our region. Staff in our Natural Resources Department assisted in coordinating local involvement and generating written and oral testimony for the public hearings and also participated in the development of the Citizens' Alternative Bristol Bay Area Plan. On April 19th we also participated in a meeting with yourself and Mr. John Moeller of the Governor's Office regarding the revision process. At that meeting, I designated Courtenay Gomez, BBNA's Director of Natural Resources, to be BBNA's representative to the small working group that DNR and the Governor's Office expressed willingness to establish to review land classifications and other matters. Please contact her in that regard at the above address.

We look forward to continuing to work with you to ensure that the final steps of the BBAP revision process and the BBAP content reflects the collaborative efforts discussed at our April 19th meeting, as well as those statements made in the attached resolution. I request you incorporate the provisions in the Citizens' Alternative Bristol Bay Area Plan into the final BBAP.

Sincerely

RESOLUTION 2013-03

A RESOLUTION IN SUPPORT OF THE CITIZENS' ALTERNATIVE BRISTOL BAY AREA PLAN AND REQUESTING PUBLIC MEETINGS IN BRISTOL BAY

WHEREAS: The Bristol Bay Native Association is an Alaska Native regional non-profit corporation and a consortium of the 31 federally recognized tribes of the Bristol Bay region; and

WHEREAS: In 2009, eight plaintiffs, composed of six BBNA member tribes represented by the tribal councils for Nondalton, Koliganek, New Stuyahok, Ekwok, Curyung, and Levelock, plus commercial and sport fishing groups, sued the Alaska Department of Natural Resources (DNR) to overturn its 2005 Bristol Bay Area Plan (BBAP) on several grounds, including that it (1) used marine criteria to identify inland habitat and thereby eliminated 93 percent of prior habitat classifications, (2) defined recreation as excluding sport hunting and fishing contrary to regulation, (3) lacked a subsistence land use classification category, and (4) defined salmon waters based on whether they were navigable by a boat; and

WHEREAS: The plaintiffs sought to restore land use classifications that protect fish and game habitat and the subsistence, commercial and recreational use of fish and game in the Nushagak and Kvichak Drainages; and

WHEREAS: The Alaska Supreme Court ruled for the plaintiffs and against DNR on its efforts to dismiss the case, and the plaintiffs and DNR thereafter settled the case with DNR agreeing to (1) reopen the planning process on 10.7 million acres, (2) consider moose and caribou in identifying habitat, (3) consider a petition to create a subsistence land use classification category, and (4) make the definition of recreation track regulation; and

WHEREAS: Although the Department of Natural Resources has proposed amendments that would improve the BBAP, the Department has declined to

- (1) establish a Subsistence land classification category comparable to the recreation category;
- (2) classify non-navigable anadromous waters as habitat;
- (3) classify much of the moose wintering areas as habitat; and
- (4) classify caribou calving and wintering areas as habitat; and

WHEREAS: Through the Bristol Bay Regional Visioning Project, Bristol Bay residents stated that access to a subsistence way of life is of the utmost importance to local communities, as is asserting the importance of local voices in managing our natural resources; and

WHEREAS: The 2013 Revision of the Bristol Bay Area Plan allowed for a public comment period which closes on May 6, 2013;

WHEREAS: DNR's failure to address all of the points of action identified in the above mentioned lawsuit demonstrates that the Alaska Department of Natural Resources proposed revisions to the Bristol Bay Area Plan do little to protect the people of the region against threats to Bristol Bay's land, water, fish & wildlife resources, economy and traditional way of life.

WHEREAS: The Citizens' Alternative Bristol Bay Area Plan incorporates the shared values of the tribal communities of Bristol Bay as it follows the Bristol Bay Regional Vision by providing for protection of our land and resources while promoting local involvement in the public processes governing natural resource management; and

WHEREAS: The Citizen's Alternative Bristol Bay Area Plan urges the Department of Natural Resources to incorporate the following considerations into DNR's 2013 Revised Bristol Bay Area Plan:

- (1) Establishing a Subsistence land classification category, or making subsistence a consideration in designating land as habitat and for retention in state ownership;
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not;
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvichak drainages;
- (4) Increasing Habitat Classifications for wildlife and fish;
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages;
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining;
- (7) Encouraging Voluntary Cooperative Planning;
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish;
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages;
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution;"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED by the Board of Directors of the Bristol Bay Native Association that it supports the Citizens' Alternative Bristol Bay Area Plan in concept urges that the Citizen's Plan be incorporated into a revised Bristol Bay Area Plan.

CERTIFICATION:

I, the undersigned Secretary of the Bristol Bay Native Association, do hereby certify that the Board of Directors of the Bristol Bay Native Association passed the foregoing resolution at a duly called and noticed meeting on this 22nd day of March, 2013, and that a quorum was present.

Comment 16 of 497 - submitted on 05/01/2013 at 12:00 AM:

Our family owns 2 BB set net permits and 4 BB drift permits. These investments help support 3 Alaskan households. All together we hire about 11 additional crew for a combined total of 14 households relying on Bristol Bay fishing income.

DNR is tasked with insuring that land uses be compatible with sustained yield use. We rely on you. Salmon is a fabulous renewable resource and a cornerstone of the economy in a very large region of our state. Even though I appreciate DNR's revision of the 2005 BBAP, it does not do enough to restore balance and to protect fish and wildlife habitat. The revised Plan should

1. Reestablish the 1984 Bristol Bay Area Plan.
2. Designate in stream flow for all anadromous water, not just navigable ones.

(I apologize but I must regress for a moment. Only navigable streams? Really? Every summer Alaskans and tourists watch spawning salmon swimming in very small streams. It's not rocket science.)

3. Increase habitat classifications for fish and wildlife.

4. Do no harm. Use the precautionary principle. Do not displace current economic activity.

The unrevised 2005 Plan reclassifying land as only for mining was downright shameful skullduggery. We rely on you for a sustainable, multi-use plan. Please revise the 2005 BBAP again.

Sincerely

Comment 17 of 497 - submitted on 05/05/2013 at 12:00 AM:

On behalf of the Wild Salmon Center, please accept our comments on the Department of Natural Resources' (DNR) proposed amendments to the 2005 Bristol Bay Area Plan (BBAP). Our mission is to promote the conservation and sustainable use of wild salmon ecosystems across the Pacific Rim. We identify science-based solutions to sustain wild salmonids and the human communities and livelihoods that depend on them. We have an office based in Anchorage, Alaska and work extensively in the Bristol Bay region.

The Bristol Bay region supports one of the most productive wild salmon ecosystems on earth. Since statehood, the Alaska state government has recognized the importance of the region and has taken many steps over the years to protect salmon habitat for the benefit of all Alaskans. One instrument the state has used in the past to implement these protections is the BBAP.

Reflected throughout the 1984 BBAP was the notion that while the area must be managed for "multiple use", habitat was highly regarded as the primary use of the area. That led Alaska land managers to co-designate most of the region as habitat. The habitat co-designation and corresponding classification ensures that other uses, if allowed, are compatible and not destructive to essential fish and wildlife habitat. The habitat designation also protects commercial, recreational and subsistence uses of fish and wildlife.

The 2005 BBAP drastically changed DNR's land management approach in Bristol Bay from the previous 1984 plan. The 2005 plan eliminated the habitat designation and corresponding habitat land classification for nearly 94 percent of the region. DNR's proposed amendments to the 2005 BBAP offer some positive changes. However, we believe that the amendments fall well short of implementing the kind of protection for fish and wildlife habitat, and subsistence and recreational uses of fish and game that are necessary in the region.

I. DNR should propose additional substantive changes to its proposed amendments.

We are encouraged by DNR's willingness to revisit the 2005 BBAP and make changes, but we implore DNR to take a hard look at its proposed amendments and make additional substantive changes. The BBAP should implement a balanced approach to land management that truly reflects the primary uses of the area. We address each of DNR's proposed amendments and recommend additional changes below.

A. Cause Action 1: Fish and Wildlife Habitat is the primary use in the Bristol Bay region and DNR should use the Habitat designation accordingly in all units that support essential fish and wildlife habitat.

The major change between the 1984 BBAP and the 2005 BBAP is the widespread application of the "General Use" designation instead of the "Habitat" designation. DNR made this change by looking only to marine-based criteria for fish and wildlife to assess upland habitat uses of fish and wildlife. By doing so, DNR failed to adequately recognize the use of upland habitat by brown bear, moose, caribou, waterfowl and other relevant upland species.

In its amendment, DNR agrees to reclassify certain areas as habitat including riverine areas that are important for moose that were only classified Public Recreation Land but should have been co-classified Habitat. DNR agrees to make a minor change to amend the management guidelines and management intent to include management for moose and caribou wintering and calving habitat, and management for sensitive habitats for units classified as Resource Management Land, Settlement and Minerals. These changes do not go nearly far enough to address the problems with the 2005 BBAP.

Despite DNR's amendment, the "General Use" designation remains in effect for most lands in the Bristol Bay region. The "General Use" designation converts to a "Resource Management Land" classification.

Pursuant to 11 AAC 55.200 Land classified as resource management is either:

1. land that might have a number of important resources, but for which a specific resource allocation decision is not possible because of a lack of adequate resource, economic, or other relevant information; or for which a decision is not

necessary because the land is presently inaccessible and remote and development is not likely to occur within the next 10 years; or

2. land that contains on or more resource values, none of which is of sufficiently high value to merit designation as a primary use.

By definition, the use of the resource management land classification is not supported for a number of reasons.

First, since the development of the 1984 BBAP, which recognized that the major uses in the area included fish and wildlife habitat, and commercial, recreational and subsistence uses of fish and game, very little has changed. The 1984 BBAP was supported by scientific information on fish and wildlife, recreational and subsistence uses in the region. 11 AAC 55.200(1). That data still exists and because very little in the region has changed that data is still relevant. In addition, the Alaska Department of Fish and Game (ADF&G) databases contain plenty of data on upland species to scientifically justify habitat designations throughout the Nushagak and Kvichak drainages. See, Citizens' Alternative BBAP GIS Maps for species information.

Secondly, for this highly productive salmon ecosystem, of which maintaining habitat values is essential, there is absolutely no justification for using the "General Use" default designation instead of identifying and designating a primary use. 11 AAC 55.200(2). The Bristol Bay region and the Nushagak and Kvichak watersheds in particular produce 50 percent of the world's sockeye salmon. That scientifically supported figure should supply ample support for either a "Habitat" or "Water Resources Land" designation. In addition, this salmon-based ecosystem also supports large numbers of moose, caribou, brown bear, waterfowl, resident fish and many other species. For that reason, DNR would be wise to use the scientific and regional information already available to properly apply habitat and/or water resource land designations in essential fish and wildlife habitat areas.

Lastly, it is improper for DNR to rely on the notion that no development is likely to occur in the next 10 years to justify its default "General Use" designation and resource management land classification. 11 AAC 55.200(1). Mining claims are staked in many areas throughout the Bristol Bay region and the proposed Pebble Mine would provide the infrastructure to support a large mining district. Unlike the habitat classification, the resource management land classification will be considered compatible with a broad range of uses including extractive resource activities that degrade essential habitats. A habitat classification would trigger a compatibility test and public process to ensure that other uses do not destroy essential fish and wildlife habitat. The "General Use" designation and resource management land classification essentially eliminates this process which is unacceptable and not defensible.

In addition, DNR's minor proposed changes to the management guidelines and management intent fall short of providing the kind of protection for essential fish and wildlife habitat that a Habitat land classification provides. This is particularly relevant for moose wintering and caribou wintering and calving habitat which should properly be recognized throughout the Nushagak and Kvichak watersheds based on available information and designated as Habitat. See Citizens' Alternative Moose and Caribou Maps.

Finally, DNR states that it uses the Habitat designation and corresponding classification to protect subsistence uses. Yet, DNR eliminated most of the Habitat land designation and has failed to substantially restore the Habitat classification for much of the region. DNR should properly recognize a "Subsistence" classification to protect subsistence uses and use a co-designation of Habitat in relevant areas. See Citizens' Alternative BBAP Chapter 3 Resource Allocation Tables.

B. Cause of Action 2: DNR should co-designate Public Recreation and Habitat in additional units throughout the Nushagak and Kvichak watersheds.

DNR eliminated approximately 86 percent of the Public Recreation land classification in its 2005 BBAP. Recreation is an extremely important use throughout the Bristol Bay region and is important for the regional economy. Although DNR proposed to reclassify or co-classify certain areas, streams and lakes as Public Recreation land, the amendment does not go far enough. DNR is tasked with managing state lands for multiple use and sustained yield. AS 38.04.065(b)(1). DNR must also consider "physical, economic and social factors affecting the area." Id. At (b)(2). In doing so, DNR is authorized to use up to three classifications in any given unit "where the dominance of a particular use cannot be determined." 11 AAC 55.040(d).

Recreational use in the Bristol Bay region is tied to hunting and fishing. We recommend that DNR co-classify Habitat with Public Recreation where appropriate in additional units particularly in the Nushagak and Kvichak drainages. See Citizens' Alternative BBAP Chapter 3 for specific recommended changes.

C. Cause of Action 3 and 6- DNR should properly classify the entire reach of anadromous streams as habitat regardless of navigability and the navigability language in Chapter 3 should be amended accordingly.

DNR's decision to only classify as Habitat navigable portions of anadromous streams is arbitrary. Headwater streams which are often nonnavigable provide essential salmon spawning and rearing habitat. Protecting the navigable portions of anadromous streams but not the upper portions of those same streams makes no sense.

In various iterations, DNR has argued two rationales for making the navigability distinction. First, DNR has argued that legally it can only claim title and designate the portion of the stream that is navigable. That is a flawed argument. The state holds title to the entire reach of the stream bed regardless of navigability.

Secondly, DNR argues that if it classifies nonnavigable portions of anadromous stream as habitat it would affect municipal entitlements. The Lake and Peninsula Borough has approximately 50,000 acres of selected land entitlements in the Bristol Bay planning area that have not yet been transferred. DNR however has an obligation to properly manage the entire 12 million acres of uplands and designate primary uses accordingly. DNR's desire to transfer municipal entitlements can be dealt with separately without making an arbitrary decision that jeopardizes anadromous waters in the Bristol Bay region. We recommend that DNR designate as Habitat the entire reach of anadromous streams and amend the navigability language in Chapter 3 accordingly.

D. Cause of Action 4, 5 and 7: DNR properly proposed amendments to classify as Habitat the western portion of Lake Iliamna, Lower Talarik Creek special use area and the entire reach of streams closed to mineral entry by Mineral Closing Order (MCO) 393.

DNR recognized that the 2005 BBAP and the corresponding maps did not correctly designate and classify as Habitat the western portion of Lake Iliamna and Lower Talarik Creek. These areas provide important fish and wildlife habitat in addition to recreational and subsistence uses of fish and game. We appreciate DNR's willingness to make these changes.

In addition, since DNR retained MCO 393, the streams affected the MCO are now properly classified as Habitat. Protection of the entire reach of the streams closed by MCO 393 is absolutely essential to ensure implementation of the MCO. Because the purpose of MCO 393 was to close important salmon-bearing streams threatened by mineral development, we also recommend that DNR consider another MCO to protect additional streams threatened by new mineral claims in the Bristol Bay region. See, Citizen's Alternative BBAP proposed Mineral Closing Order.

II. DNR should adopt the Citizens' Alternative Bristol Bay Area Plan.

The Citizens' Alternative applies principles that protect fish and wildlife habitat and recognize the importance of commercial, recreational and subsistence uses of fish and game in Bristol Bay. These are the dominant uses in the region and have been for countless generations. While the Citizens' Alternative focuses on the Nushagak and Kvichak watersheds, DNR should apply the principles throughout the Bristol Bay planning area.

We support the Citizens' Alternative because, among other things, it:

- Establishes habitat classifications to protect fish, wildlife and subsistence uses (no General Use classification in the Nushagak and Kvichak watersheds);
- Establishes a subsistence designation;
- Uses the Water Resources designation to keep the hydrology of the Nushagak and Kvichak watersheds intact;
- Establishes an automatic instream flow protection for salmon;
- Directs DNR to use the "precautionary principle" when making any land use decisions that may significantly impact salmon;
- Presumes that all waters in the Bristol Bay region are anadromous;
- Prohibits metallic sulfide mining in the Nushagak and Kvichak watersheds;
- Establishes a process for voluntary cooperative land use planning among major landowners;
- Reinstates the Bristol Bay Advisory Board to review and recommend plan changes; and
- Proposes a new mineral closing order that would ban new mining claims on or along salmon spawning streams potentially threatened by mining.

We encourage DNR to carefully review the Citizens' Alternative BBAP and adopt the recommended changes. We also encourage DNR to include the public in the re-drafting process to avoid unnecessary delays and improve public participation. Thank you for the opportunity to comment.

Sincerely

Comment 18 of 497 - submitted on 05/01/2013 at 12:05 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I (live in, work in, visit) Bristol Bay.

Comment 19 of 497 - submitted on 05/01/2013 at 11:49 AM:

What does the EPA stand for!!! The corporate government we have trys to tell us what the EPA says does not matter!!! Why do we have the EPA? To protect the enviroment for future, not to line he pockets of corporations that could care less about loss of a habitate, way off life that brings in millions of dollars and jobs in the fishing ind. Common sense!! says the mine would be a disaster, just because off the road system they have to put in.

Comment 20 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 21 of 497 - submitted on 04/01/2013 at 12:00 AM:
RESOLUTION NO. 2013 □ 03

A RESOLUTION OF NEW STUYAHOK TRIBAL COUNCIL SUPPORTING AMENDMENTS TO THE BRISTOL BAY AREA PLAN, URGING THE STATE OF ALASKA TO REVISE THE DRAFT BRISTOL BAY AREA PLAN TO INCREASE PROTECTIONS FOR HABITAT AND FISH

WHEREAS, the New Stuyahok Tribe is a federally recognized Alaska Native Tribe in the Bristol Bay region of southwest Alaska, and

WHEREAS, Tribal Members rely on the wild salmon fishery, freshwater fisheries, and other wildlife for subsistence, and many tribal members are also employed in the commercial salmon fishery, which is the economic engine of the region, and

WHEREAS, the Tribal Council watched with concern and weighed in with letters and resolutions against the exploration of the Pebble deposit since Teck Cominco held the lease claim in 1988, some 24 years, and

WHEREAS, the State of Alaska Bristol Bay Area Plan was revised in 2005 to allow for mineral development in the Nushagak and Kvichak Drainages that would destroy significant salmon habitat loss,

WHEREAS, the 2005 Bristol Bay Area plan does not recognize the high subsistence use in the proposed Pebble Mine area for caribou, moose and trapping,

Now Therefore Be It Resolved by New Stuyahok tribal council that we approve the following changes to the 2013 Bristol Bay Area Plan and request that the State of Alaska Department of Natural Resources amend the plan to incorporate these changes:

1. Revise sections for more habitat classifications for wildlife and fish in all sections within the Nushagak and Kvichak planning area,
2. Prohibit any metallic sulfide mines in the Nushagak and Kvichak drainages,
3. Create a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining,
4. Amend the plan to include a voluntary cooperative planning effort that involves local residents from the region.
5. Water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out you, have to prove no harm to fish.
6. Creation of a Bristol Bay Advisory Board
7. Implementation of the Precautionary Principle as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
8. Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.

ADOPTED THIS 14th DAY OF MARCH, 2013.

Comment 22 of 497 - submitted on 03/18/2013 at 12:00 AM:
RESOLUTION

A resolution supporting the Citizen□s Alternative Bristol Bay Area Plan and requesting public meetings in Bristol Bay.

WHEREAS, The New Stuyahok Traditional Council is the federally recognized Alaska Native tribe serving its tribal members and the community of New Stuyahok; and

WHEREAS, The New Stuyahok Traditional Council, acting as the duly elected governing body pursuant to the Constitution of the New Stuyahok Traditional Council, has the authority to establish relationships and enter into contracts; and

WHEREAS, Our tribes, sportsmen, and commercial fishermen have made every attempt to work with the State regarding our concerns. DNR did no consultation with Bristol Bay residents, tribes, local governments, commercial fishing groups, or others before drafting the proposed changes to the plan

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat □

- (1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Koktuli River, the Upper Talarik River, and eight streams to south of Pebble block,
- (2) navigable anadromous waters in their entirety, including the South Fork of the Koktuli River to Frying Pan Lake;
- (3) moose calving and some wintering areas to include the North and South Forks of the Koktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has-

- (1) declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) declined to classify non-navigable anadromous waters as habitat;
- (3) declined to classify much of the moose wintering areas as habitat; and
- (4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, The New Stuyahok Traditional Council expects that the Department of Natural Resources will incorporate the other considerations of the New Stuyahok Traditional Council in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvichak drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the New Stuyahok Traditional Council requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the New Stuyahok Traditional Council supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the New Stuyahok Traditional Council requests that the Department of Natural Resources hold public meetings in the villages that sued DNR as soon as possible, and in other communities.

Adopted this 14th day of March, 2013.

Comment 23 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 24 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish

- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 25 of 497 - submitted on 05/03/2013 at 11:11 AM:

I don't like the 2005 BBAP at all it takes away so much of what we are about, I really like and support the Citizen's Alternative Bristol Bay Area Plan which does more to protect what we all care for. Thank You Greg Andrew Jr.

Comment 26 of 497 - submitted on 03/20/2013 at 01:14 PM:

I see for moose habitat there is nothing much listed for the Kvichak river, we from Levelock use Yellow Creek allot from 156*40'44.37"w 59*52.93"n to 156*30'26.98"w 59*27'26.61"n. Also we hunt all along the Kvichak river both banks, I also see that for calving the Kvichak river is also left out, in the spring they calve from below Levelock up to the No-see-um Lodge. I do not appreciate the State taking away our use areas and changing the classifications, do your job and protect the people of the state, not pushing for the outsiders (not even from this country) coming in and mining our area to line your pockets. You also need to have in the plan subsistence use areas i.e. Moose, Caribou, Fish, water fowl, egg gathering, berry picking, plant gathering, etc. If you really want to get it right get some local people that are from the area (Levelock, New Stuyahok, Ekwok, Koliganek, Igiugig, Kokhanok, Naknek, Dillingham, etc.) in on the formation of the Bristol Bay Area Plan. I grew up in Kokhanok AK and we used to see caribou all the time on the western shore of Lake Iliamna because there near where Pebble is located is the Caribou calving area, now we don't see any caribou in that area at all, the people from Iliamna/Newhalen come to the Levelock area and hunt for them and time after time I see them take over limit and not getting caught but a few times. I am of this State and I do not feel protected by the very people that should be protecting us. Thank you for at least giving us a chance to comment. Greg Andrew Jr.

Comment 27 of 497 - submitted on 05/06/2013 at 02:41 PM:

the state should be backing up the people of the state, especially the indigenous people that were here before all the white man came and started making laws (some ridiculous such as the 2005 BBAP) since the state is not taking care of its people, I hope and am pushing hard for the EPA to step in with the 404c to do the right thing, You say that in an article I read that the decisions you're making are for what's best for the state? If that's the statement then do what's best for the state, its people, the land and the fish and wildlife, what this great state is known for, you allow the mine and you take away the meaning of the great state. Greg

Comment 28 of 497 - submitted on 03/22/2013 at 12:00 AM:

Hello, In looking at the maps for habitat I see you all missed a whole bunch of areas for moose habitat, moose calving and for caribou, when you redo the BBAP you really need to consider adding what I've included on the map. I flew the area as

a private pilot for 15 years and have seen the moose calving as outlined in the orange areas, moose habitat in the pink area, and caribou in the red area. These are just areas used by the local people here from Levelock not including other communities, which would be a much larger area. I also noticed that for the waters, you classify for fish only in navigable waters when actually as you should know fish go much further into non-navigable waters to spawn and that is where the small fish grow- eliminate that and what do we have? do the math.

Pdf of Map attached.

Comment 29 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 30 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
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Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 31 of 497 - submitted on 05/06/2013 at 12:00 AM:

The Iliamna Village Council is the recognized Tribal Governing Body of the Iliamna Village, and is federally recognized by the United States.

After much discussion and attending a Community Meeting learning and understanding what it means to be considered as "Habitat Area", Iliamna does not want to be considered or recognized as "Habitat Area".

On behalf of Iliamna Village Council we are commenting on the Bristol Bay Area Plan Amendment (2012) and Determination of Reclassification. We understand that you are taking comments at this time which will be on the amendment and determination.

Thank you for your time and consideration.

Sincerely

Comment 32 of 497 - submitted on 05/06/2013 at 12:00 AM:

Iliamna Natives Limited is the Village Corporations that owns 97,000 acres closest to the Pebble Project. We have concerns of the requests from special interest groups that "subsistence" activities be managed by DNR, is beyond your jurisdiction. DNR manages habitat, but the Board of Game decides who gets to hunt on that habitat. DNR can assure that habitat is available for moose or caribou, but it is the purview of the Board of Game to decide who can hunt the animals located in that habitat.

Iliamna's concern is that designating such huge swaths of land in Bristol Bay as Habitat and we do not want added regulation to our area. We already are dealing with special interest groups, villages that live 150 miles away from us and federal agencies attempting to put more regulations and restrictions on our surface lands. We are in a very depressed area with limited opportunities and we would respect your agency to consider our opinion. These impacts will only hurt the locals who are already struggling to survive in the Village.

Thank you for your consideration.

Comment 33 of 497 - submitted on 05/06/2013 at 08:13 PM:

May 6, 2013

Re: Bristol Bay Area Plan Amendment 2012

Please consider this letter and know that Alaskan Natives have a right to keep and to hold their traditional subsistence lifestyle.

I am writing this to you and your colleagues today for which traditional subsistence foods is heavily relied upon by Alaskan Natives who have been in the state of Alaska for many, many years and years to come.

Our state should not have to carry out these heavy toxic business(es) that will diminish Alaskan traditional subsistence lifestyle. There are other ways to manage our United States.

This public comment to you is a cry for help from you to ensure our Alaskan traditional subsistence lifestyle is not put into harm's way. What is it to human with no food? Death. Please do not partake in agreeing with the death of our Alaskan traditional subsistence foods and death of our Alaskan Native traditional land.

Comment 34 of 497 - submitted on 03/18/2013 at 12:00 AM:

RESOLUTION NO. 3-6-13A

A Resolution requesting that the Department of Natural Resources incorporate all matters specified below into its 2013 Revised Bristol Bay Area Plan, and supporting the Citizen's Alternative Bristol Bay Area Plan, and requesting public meetings and hearings.

WHEREAS, The Levelock Village Council is the federally recognized Alaska Native tribe serving its tribal members and the community of Levelock; and

WHEREAS, the Levelock Village Council, acting as the duly elected governing body pursuant to the Constitution of Levelock Village Council, has the authority to establish relationships and enter into contracts; and

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat □

- (1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Koktuli River, the Upper Talarik River, and eight streams to south of Pebble block,
- (2) navigable anadromous waters in their entirety, including the South Fork of the Koktuli River to Frying Pan Lake;
- (3) moose calving and some wintering areas to include the North and South Forks of the Koktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has-

- (1) declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) declined to classify non-navigable anadromous waters as habitat;
- (3) declined to classify much of the moose wintering areas as habitat; and
- (4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, The Levelock Village Council expects that the Department of Natural Resources will incorporate the other considerations of the Levelock Village Council in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvijack drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the Levelock Village Council requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Levelock Village Council supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Levelock Village Council requests that the Department of Natural Resources join with the tribal councils in holding public meetings on both DNR's proposed changes and the Citizen's Alternative in the villages that sued DNR as soon as possible, and in other communities.

Adopted this 6th day of March, 2013.

Comment 35 of 497 - submitted on 05/06/2013 at 12:00 AM:

Good Day,

I am of the opinion that more and more information is coming out about development in and around the Bristol Bay Water Shed and it is all pointing to the degradation and harmful effects on the environment.

As a long time Alaskan I realize the need for jobs and economic growth however once development begins it will ongoing and the effects we envision today will be small compared to what future generations will witness. Is this what is best for Alaska? Do we want to see the end to a world class fishing industry and degradation of a vast Alaska Area for the short term gain of Foreign Industry?

I hope that The State of Alaska and DNR will work with the local people of the Bristol Bay Area and consider the Citizen's Alternative Plan for Bristol Bay.

Sincerely

Comment 36 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 37 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 38 of 497 - submitted on 05/06/2013 at 09:16 PM:

I strongly urge that the Citizens' Alternative Bristol Bay Area Plan be implemented. I am not convinced that large scale mining operations in the Bristol Bay drainage are compatible with a sustainable salmon fishery.

In my opinion, strong salmon fisheries are more important in the long term than large scale mines that have the potential to degrade the salmon resource.

Thank you for your consideration.

Jane Aspnes

Comment 39 of 497 - submitted on 05/06/2013 at 11:19 AM:

I strongly support the Citizens' Alternative Bristol Bay Area Plan. I do not support the 2005 Alaska Department of Natural Resources Bristol Bay Area Plan as originally published.

I strongly believe that the salmon resource in the Bristol Bay and its drainage area is too important and too valuable to be potentially damaged by large scale mining operations.

Thank you for your consideration of my concern.

John Aspnes

Comment 40 of 497 - submitted on 05/03/2013 at 12:00 AM:

As an Alaskan resident and business owner whose livelihood depends on healthy ecosystems on the Alaska Peninsula. I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).

" Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.

Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you for considering my comments.

Sincerely

Comment 41 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 42 of 497 - submitted on 05/05/2013 at 09:27 AM:

I've lived in Alaska for over 40 years. I urge both sides in the debate to consider a balanced approach to natural resource development in Alaska. We cannot sacrifice one resource for the development of another, mining for subsistence nor subsistence for mining. If too many regulations are put in place it will push up the cost of mining, which is already high by virtue of our remoteness. Pushing up the costs too much will cause mining operations to decline, costing much needed jobs for Alaskans, particularly in these smaller villages and rural areas of our state where unemployment is high. However, that being said, we cannot allow mining operators to run wild, potentially harming the livelihoods of those who rely on fishing and hunting for their subsistence lifestyle or for their business operations. We cannot have all of one and none of the other and therefore must work together for a compromise that promotes the safe development of both our mineral and wildlife resources.

Comment 43 of 497 - submitted on 05/04/2013 at 12:00 AM:

The 2005 BBAP struck an appropriate balance between those who would lock up our state as a national park, and those desiring development.

To go beyond the changes agreed to in the settlement of Nondalton Tribal et al v. State of Alaska, is just wrong. Using litigation to force further changes to an area plan sets a dangerous precedent and opens the door to allow groups opposing all settlement or development to hold sway. Alaska needs to develop our natural resources to provide a future for this state.

The 2005 BBAP does not favor mining above fishing. No one wants to damage the salmon habitat in Bristol Bay. But there needs to be a balance and the 2005 BBAP, with the litigated changes, strikes that balance.

Alaska is a land that can support multiple uses. Please don't lock up our lands to prevent development of our mineral resources.

I urge you to stand firm and reject narrow proposals that seek to restrict access to our lands and their resources.

Sincerely

Comment 44 of 497 - submitted on 05/06/2013 at 08:32 PM:

This mine is a horrible idea. Even under the best conditions mines pollute! Please protect this incredible protein factory known as Bristol Bay.

Comment 45 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 46 of 497 - submitted on 04/30/2013 at 11:57 AM:

I support the Citizens Alternative to the Bristol Bay Alternative Plan.

Comment 47 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 48 of 497 - submitted on 05/01/2013 at 12:04 PM:

As a former Alaskan resident, I implore you to keep the Bristol Bay area free from any mining development. I have enjoyed the sport-fishing of Alaska and I would be mortified if any proposed development were a possible destruction to this area. Once a mine is established and something goes wrong, it's too late. If anyone is silly enough to think that a mine plan won't or can't have anything go wrong is fooling themselves. What a disaster it would be to have this salmon fishery destroyed!

Comment 49 of 497 - submitted on 04/30/2013 at 11:46 AM:

Hi, Im Brenetta Beltz. I was born and raised in Bristol Bay. I am against the pebble mine for Bristol Bays own good resources. I am for the protection of our subsistence way of life.

Comment 50 of 497 - submitted on 04/22/2013 at 12:00 AM:

I am a lifelong resident of Bristol Bay. My family participate in commercial and subsistence fishing in the Kvichak Bay and Nushagak Bay drainage river systems for over the last 40 years. My family hunts small and large game (moose, caribou, birds, porcupine) we gather berries (salmon, blue, black, red) every fall and use the traditional plants. We also participate in the natural beauty by camping etc. afforded to us by living in Alaska. We also own lands granted to use by our parents in the Nushagak.

I live in Dillingham and am currently able to use all the resources in Bristol Bay with my children and grand children. So with that I am writing to support the Citizen's Alternative Bristol Bay Area Plan (CABBAP). I request you include additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classification for wildlife and fish
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution.
- Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification.

When decisions are made by Dept. of Natural Resources please consider all avenues to protect our natural renewal resources both in our salmon streams and lands, I respectfully ask they be classified as habitat in Bristol Bay. I would like my grandchild, and future generations to be afforded the same opportunities to engage in a subsistence lifestyle that we have today.

Thank you for your consideration.

Comment 51 of 497 - submitted on 05/06/2013 at 12:00 AM:

Thank you for the opportunity to comment. I appreciate being able to express my position that the Bristol Bay Area Plan 2005 was more than adequately vetted the first time and that the resultant plan was well balanced for all users. There is no need to make additional changes as this area is intended for multiple use management. I urge you to adopt the 2005 as it stands and make no changes to them.

Sincerely

Comment 52 of 497 - submitted on 05/01/2013 at 03:37 PM:

Please consider the following comments regarding Bristol Bay Area Plan Amendment 2012 (BBAP)

1. In 2005 the Alaska Department of Natural Resources (DNR) revised the Bristol Bay Area Plan (BBAP) which was drastically different from the 1984 plan.
2. DNR needs to reinstate the habitat classification for non-navigable portions of anadromous streams so that all of the anadromous streams in Bristol Bay would be protected.
3. There is a cultural linking that people of the region have with salmon and wild game. DNR has refused to restore the habitat classification for salmon, caribou and moose, yet recognizes a minerals classification that paves the way for mining
4. DNR failed to consider the affects or consult with the Bristol Bay residents, tribes, local governments, commercial fishing groups or others before drafting the proposed amendments to this plan.
5. Please consider The Citizens Alternative.

- Ø a. An automatic instream flow protection for salmon.
- Ø b. Use of the □precautionary principle□ when making any land use decisions that may significantly impact salmon.
- Ø c. A presumption that all waters in the Bristol Bay region are anadromous.
- Ø d. Prohibition of metallic sulfide mining in the Nushagak and Kvichak watersheds.
- Ø e. A new mineral closing order that would ban new mining claims on or along salmon spawning streams potentially threatened by mining.

Sincerely,

Cindy Birkhimer

Comment 53 of 497 - submitted on 05/07/2013 at 12:00 AM:

Thank you for the opportunity to comment on the Alaska Department of Natural Resources' (DNR) Bristol Bay Area Plan Amendment (BBAP Amendment). Since 1919, the National Parks Conservation Association (NPCA) has been the leading voice of the American people in protecting and enhancing our National Park System. Today we have more than 750,000 members and supporters, of which nearly 2,000 are in Alaska.

NPCA appreciates the work you and your team have done to reevaluate the agency's management direction and land classifications within the Bristol Bay watershed. Unfortunately, we found the Amendment's maps lacked labels for communities and water bodies and their file sizes were unnecessarily large and unwieldy, making the maps difficult to understand and handle. Please improve the maps in the next version of the BBAP Amendment and ensure they indicate the transportation corridors being considered throughout the area.

We support all of the recommended Public Recreation and Habitat classification changes illustrated on Map 3 of the BBAP Amendment. Thank you for affording these additional protections to key habitat and subsistence use areas. We believe that all of the lands and waters identified on Map 1 as moose wintering and calving areas deserve the same habitat classifications, particularly in and around the Chulitna River and Pedro Bay. Please apply MCO 393 to the Chulitna River.

We also support the Citizen's Alternative to the Bristol Bay Area Plan Amendment and find it to be more compatible than the 2005 BBAP or its 2013 Amendment with the management direction of Lake Clark National Park and Preserve, as well as the Integrated Resource Management Plan being developed by Nondalton Tribal Council. We support the Citizen's Alternative's suggestion for cooperative land use planning. For over 45 years, state, federal and tribal leaders have been in agreement that the top management priority in Bristol Bay is protecting and enhancing its outstanding wild salmon fishery. Nearly everyone and everything in Bristol Bay is connected to the fishery. The fish, wildlife, and watersheds of this region do not recognize property boundaries and cooperative land use planning is necessary in order to coordinate and implement meaningful and effective management strategies.

We urge DNR to adopt the Citizen's Alternative's suggested principles and standards, including the prohibition of metallic sulfide mining in the Nushagak and Kvichak River watersheds. We agree with its consistent, common sense methodology of assigning habitat classifications to areas known to have "essential" and "important" habitat and subsistence uses, including the Chulitna River watershed and Pedro Bay area.

In reviewing the BBAP Amendment, we have focused on the potential effects of the BBAP Amendment's proposals upon adjacent Park Service-managed lands and resources. We are concerned that lands and waters upstream of and adjacent to Lake Clark National Park and Preserve are being promoted for intensive development with little regard for the potentially widespread negative cumulative effects that may result. The Environmental Protection Agency's revised Bristol Bay Watershed assessment identifies 15 sites beyond the proposed Pebble Mine where exploration activity occurred during 2011-2012. Clearly, development of an industrial mining district is looming over this salmon-rich landscape.

Just upstream of Lake Clark National Preserve's boundary, DNR has allowed mining claims to be staked across 130,000 acres of the Chulitna River basin. EPA's analysis shows that 3 deposits - Groundhog, Big Chunk North, and Big Chunk South - could be mined here. If Pebble Mine is developed, the likelihood of expanding the mining district and road system to include the Chulitna watershed, Lake Clark's largest freshwater tributary, increases substantially. How do you perceive the potential direct, indirect and cumulative impacts of this decision? How will DNR ensure that park resources will not be impaired by the mining district, especially mining activities in the Chulitna River watershed?

Also, please explain the purpose and need for the settlement area classifications within the Chulitna River watershed and around the eastern half of Iliamna Lake. Some of these settlement areas have essential moose wintering habitat. If

conveyed to private ownership, can these lands be used for industrial, commercial purposes as well as recreational property? What are the direct, indirect and cumulative impacts of allowing settlement and development of these areas?

Created in 1980, the first stated purpose of Lake Clark National Park is to protect a portion of "the watershed necessary for the perpetuation of the red (sockeye) salmon fishery in Bristol Bay," (ANILCA Section 201(7)(a)). Congress recognized the importance of designating Lake Clark National Parks and Preserves' to preserve a portion of the Bristol Bay ecosystem's integrity and productivity, but our national park alone is not enough to ensure the biological health, diversity, and balance of the Nushagak and Kvichak Rivers salmon fishery, especially if park habitat and resource integrity is compromised by mining activity just upstream of its boundary.

If the Pebble mining district is developed, national park managers would face new challenges as roads are carved along park boundaries and adjacent lands are industrialized. Water flowing to Lake Clark could be degraded or diverted, impairing park habitat downstream. Wild salmon swimming to spawning grounds within the park could find contamination and culverts along their migration route. Displaced and stressed wildlife could encounter more poachers and sport hunters. Local Alaska Native cultures, struggling to maintain their traditional ways of life in an ever-changing world, could find fewer fish and wildlife to harvest for their families and face more competition for these limited resources. The area's tourism industry, specializing in the high quality wilderness recreation and wildlife viewing, could see that experience tarnished for many park visitors.

Overall, NPCA would support management directions that prioritize protecting Bristol Bay's wild salmon fishery as the region's top priority. We see the BBAP Amendment as a positive step in this direction, but suggest it be revised with more consideration of cumulative impacts to neighboring land managers and more extensive classifications for important wildlife habitat and subsistence areas. Thank you for the opportunity to comment.

Sincerely

Comment 54 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in a meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Create a Bristol Bay Advisory Board made up of local residents
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wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 55 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 56 of 497 - submitted on 04/30/2013 at 08:35 PM:

BBAP should give full protection to the ecosystem of Bristol Bay. anything less is not acceptable. the long term economic and social well being of the region depends on its sustainable and renewable natural resource of salmon. It is not only an economic necessity but also a moral duty to the future generations to protect it from being ravaged for short term profit.

Comment 57 of 497 - submitted on 04/01/2013 at 12:00 AM:

I am encouraging DNR to restore balance to the Bristol Bay Area Plan. Looking at the maps of 1984 and 2005 is awful! That is essential fish and wildlife land we are talking about. We need to increase habitat classifications for wildlife and fish; prohibit metallic sulfide mines in the Nushagak and Kvichak drainages; Implement a new Mineral Closing order that would ban new mining claims on or along salmon spawning streams threatened by mining; Use voluntary cooperative planning; Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they need to prove no harm to fish; Create a Bristol Bay Advisory Board made up of local residents; Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution; Operate under the presumption that ALL waters in Bristol Bay are needed for Salmon unless proven otherwise.

We are commercial fisherman and we need to protect our waters so the salmon will continue to return every year. Please accept this as my comments for DNR's 2013 Bristol Bay Area Plan.

Thank you

Comment 58 of 497 - submitted on 05/06/2013 at 12:00 AM:

Position: I fully support the Citizen's Alternative Bristol Bay Area Plan

My connection to Bristol Bay: I am a lifetime resident of Alaska. I have commercial fished continuously in Bristol Bay for over 30 years. My family has commercial fished continuously in Bristol Bay since the 1940's. We have subsistence fished there for generations.

The reasons I support the Citizen's Alternative BBAP:

- 1) It more fully protects critical habitat that is essential to the health and survival of the Bristol Bay region
- 2) It provides for more ongoing input by citizens and residents of the Bristol Bay Area.

Of the 2 reasons, habitat protection is the most important.

To have anything short of full protection as provided in the Citizen's Alternative BBAP denies one of the following:

- 1) The importance of renewable resources in the Bristol Bay area to the residents.
 - a) The economic importance of commercial fishing industry. So many are directly or indirectly involved.
 - b) The economic importance of sport fishing lodge/guide industry. Again so many are directly or indirectly involved.
 - c) Subsistence. The residents absolutely rely on a healthy renewable resource for their dietary needs and their culture.
- 2) The danger posed by the large scale mining not prevented in the state BBAP: The dangers posed by large scale metal sulphide mines. The danger posed by large scale gold/copper mines to salmon habitat. The danger of huge impoundment dams constructed of tailings. The location of these structures in an earthquake zone. Huge mine such as Pebble as a precursor to a huge Mining district. All the associated impacts of a Mining district such as roads. power production needs. transport needs. production needs. The high rate of ground water movement in the Bristol Bay area that makes it more vulnerable to ground contaminants. A need for monitoring of the tailings....forever.
- 3) The importance of a healthy habitat in the area of the proposed Pebble mine. This is where salmon are born and reared. This is upstream of so much of the lakes, streams, and rivers critical to salmon survival. This area is important to the wildlife that thrive in this area.

Essentially, the ecological health of the upper waters of the Bristol Bay watershed is not just important to the health of the entire region and the residents...they are all one and the same. The upper waters produce the renewable resource that provides biological, economic, dietary, and cultural life to all that live in Bristol Bay.

The Pebble mine proponents have acknowledged the inherent danger of large scale mines by words and actions:

By promising permanent on-site capability to not only monitor the tailings but to address any problems that occur FOREVER, they acknowledge that the danger from the waste will continue..... FOREVER. Claiming that a mining company will be monitoring the mine site for all time is at best a fantasy and at worst the punch line to a bad joke.

By supporting diminished protection status for such a large and critical area of the Bristol Bay watershed, mine proponents admit they are not capable of developing the upstream area without the likelihood of major damage. Mining proponents are happy to make promises and assurances as long as they are not required to do what they promise.

In short, unless mining interests can develop some Star Trek "beam me up Scotty" technology before they begin mining, the only protection available for the upstream habitat is that provided in the Citizen's Alternative BBAP.

Comment 59 of 497 - submitted on 05/01/2013 at 12:00 AM:

Thank you for the opportunity to comment on this Area Plan. This Area Plan and the entire planning process in Alaska will be impacted by how DNR addresses the issues that have been presented. In the settlement that resulted in this current plan revision, DNR agreed to make six changes to the Bristol Bay Area Plan. DNR should therefore address these six items and no more. To go beyond these six items would be wrong and would set a bad precedent.

The 19 million acres that are included in this plan is a very large area; it is more than 17% of the land owned by the State of Alaska. The State Constitution requires that this land be managed for the "maximum public benefit" and instructs the State " ... to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." Single use designation of large sections of the state for any special use, including wildlife or recreation, violates the constitutional mandate.

Much of this area was specifically selected by the State because of the potential for yet to be discovered mineral deposits. It appears that one such economic deposit has been found and the entire State should be excited about the economic benefits such a mine could bring, especially to this economically depressed area of the State. Mining will help diversify the economy of Southwest Alaska and allow people to continue living in their villages without the need to move away to find a job that will allow them to provide for their families.

Subsistence activities are included in the definition of "Wildlife Habitat Land" and there is therefore no need to have a separate "subsistence" category. Also, subsistence is a generally allowed use on all state land.

I urge the State to address and answer the six items as agreed for the court and to not become distracted by the attempts of mining opponents to expand the review and confuse the general public.

Sincerely

Comment 60 of 497 - submitted on 05/01/2013 at 11:44 AM:

I took a look at the State's 2005 Bristol Bay Area Plan and the proposed amendments, and I found that the State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that drive Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why my boyfriend works in and wants to protect Bristol Bay, and I would strongly encourage you to look at it more closely.

Comment 61 of 497 - submitted on 05/01/2013 at 11:06 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy.

The Citizens' Alternative Plan is a better option. It is more scientifically based and uses mapping effectively to respond to needs of the people. It is more consistent with historical federal, state, local and tribal efforts to balance conservation and development. It improves area-wide management guidelines.

Special consideration should be given to traditional usage of this area by the 31 native peoples who live in this area. The Citizens' Alternative Plan does this.

Comment 62 of 497 - submitted on 05/01/2013 at 11:09 AM:

My husband worked in the Bristol Bay area flying and guiding fisherman from around the world in the 1980's and 1990's. I was fortunate to have accompanied him on several trips to the pristine waters and riverbeds of the area. I cannot imagine having this valuable resource and beauty of nature disturbed for the benefit of others. I want to be able to return to the Bristol Bay area with my grand and great-grandchildren some day to share this rich and valuable natural resource.

Please consider saving the Bristol Bay watershed areas for future generations of Alaskans and our friends throughout the world. We have the choice now and it must be a good decision.

LLBowers (Chugiak)

Comment 63 of 497 - submitted on 05/01/2013 at 02:05 PM:

Please leave Bristol Bay alone. Do not mine, no more fracking. Let the land, the animals, the people and the community heal. Stop destroying the planet and start a process of renewal. we need economics to work for us and the earth. This story of power over planet is tiresome and it hasn't proven to work in the past and it will not work in the present or future. Lets be guided by ecology and for once listen to the needs of our environment. And in hearing, create jobs of those that will sustain a planet and a people.

Comment 64 of 497 - submitted on 05/02/2013 at 12:00 AM:

It is my belief that the 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments are not necessary. Furthermore, the revisions set a dangerous precedent for future area plans.

Comment 65 of 497 - submitted on 04/01/2013 at 12:00 AM:

This letter has to do with my ideas on DNR's 2013 Bristol Bay Area Plan.

First I think the highest priority for your plan should be the preservation and protection of fish habitat. Bristol Bay region is a "salmon factory" and it should be left that way.

No Pebble-type mines should be allowed in the Bristol Bay watershed. ????, no metallic sulfide mines should be allowed in the Bay watershed.

We should also have a Bristol Bay Advisory Board of local residents to help guide the eco-system in Bristol Bay from huge mining companies.

Fish habitat has to be the top priority. Re-establish water levels based in the 1984 plan for the Bristol Bay.

Land management in the Bristol Bay region needs to protect fish & game habitat over everything else. Finally no huge mines like is invisioned for the so called Pebble prospect - wrong place for Pebble - not a good fit in Bristol Bay watershed.

Comment 66 of 497 - submitted on 05/03/2013 at 12:32 PM:

Hi,DNR, Please adopt the Citizens Alternative Bristol Bay Area Plan. We need to value our fishery as much as we value mining. The plan right now is heavily weighed towards mining. As for even considering a mine the size of Pebble above the greatest managed fishery in the world is beyond my comprehension. Maintained and monitored for 250 years is a promise I find hard to believe could ever happen. Those companies will be long gone after the profit is made and everybody knows that. Oh, and" when the levee breaks we got no where to go" Happy Trails, Scott Bredbenner

Comment 67 of 497 - submitted on 04/16/2013 at 12:00 AM:

The Nushagak River, the large river basin encompassed in Region 6 of the Bristol Bay Plan, provides important rearing and spawning habitats for some of the world's largest wild salmon populations. Starting in 2011, we have been characterizing strontium (Sr) isotopic variation ($87\text{Sr}/86\text{Sr}$) in fish otoliths and waters of all major tributaries of the Nushagak River to develop a tool to track natal sources of Pacific salmon, particularly, Chinook salmon (*Oncorhynchus tshawytscha*). Please see the attached map of sampling sites within the Nushagak watershed where we have collected waters and otoliths from Chinook and coho salmon (both juvenile and adult life stages) during the autumns of 2011 and 2012. Alaska Sea Grant funds this project. As indicated in this map, we have successfully captured, and/or documented presence of, Chinook and coho salmon in every major tributary of the Nushagak. The population structure of salmon is typically hierarchical with a strong geographic relationship, whereby there exist stream-specific populations. The aggregate of all stream-specific populations of a watershed (or region) impart significant stability to fisheries resources, such as those of the Nushagak River and Bristol Bay, in a similar fashion to the "Portfolio Effect" in economic stock investments. Large-scale changes in the freshwater environment, such as mineral development pose real threats to the biodiversity and overall productivity of these species, and to communities that rely upon sustainable fisheries (as described by Schindler et al. 2010. Nature 456:609-612). Although current genetic methods are able to accurately identify broad population structure of the large rivers flowing into Bristol Bay, they are unable to identify local breeding populations (the fundamental reproductive unit of salmon) within these large watersheds (e.g., the Nushagak River). A need exists to develop tools that can accurately and cost effectively identify local breeding populations of salmon to better monitor and conserve salmon biodiversity and the natural resource they represent to humans. This project focuses on the Nushagak River, a region proposed for enhanced mineral extraction, as a case study to develop the use of Sr isotope ratios to track salmon natal sources in Alaska. The Nushagak River drains a very diverse geological landscape, making it likely that there exist isotopically unique tributaries and respective salmon breeding populations. Strontium isotope ratios ($87\text{Sr}/86\text{Sr}$) in otoliths (the auditory structure of fish) continually record aqueous environmental variation experienced

during the lifetime of a fish in distinct accretionary bands of calcium carbonate. Our research uses $87\text{Sr}/86\text{Sr}$ analyses of river water and otoliths of salmon (with a primary focus on Chinook salmon) to elucidate Sr-isotopic variation among salmon producing streams of the Nushagak River. Through evaluation of spatial and temporal variability of $87\text{Sr}/86\text{Sr}$ in Nushagak River waters and salmon therein we are creating a Sr-isotopic baseline map of all potential salmon natal sources, which can then be used to track natal origins of salmon caught in mixed-stock fisheries. This research will provide basic knowledge for better understanding the interaction between salmon and their habitat and may compliment other sources of information, such as genetics, used for conserving Pacific salmon biodiversity. Tools which can be used to identify and track salmon population structure within the Nushagak and other watersheds of Bristol Bay will provide fundamental information for conducting accurate cost-benefit analyses regarding competing resources, such as mineral extraction and salmon fisheries, where decisions to develop one or the other directly impact the economic and ecological health of this region's resources and communities.

Sincerely

Comment 68 of 497 - submitted on 03/18/2013 at 12:00 AM:
RESOLUTION

A resolution requesting that the Department of Natural Resources incorporate all matters specified below into its 2013 Revised Bristol Bay Area Plan, and supporting the Citizen's Alternative Bristol Bay Area Plan.

WHEREAS, the Trout Unlimited is non-profit corporation in Alaska and serves it commercial fishermen's members in Bristol Bay; and

WHEREAS, As one of the plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat □

- (1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Kaktuli River, the Upper Talarik River, and eight streams to south of Pebble block,
- (2) navigable anadromous waters in their entirety, including the South Fork of the Kaktuli River to Frying Pan Lake;
- (3) moose calving and some wintering areas to include the North and South Forks of the Kaktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has-

- (1) declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) declined to classify non-navigable anadromous waters as habitat;
- (3) declined to classify much of the moose wintering areas as habitat; and
- (4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, Trout Unlimited expects that the Department of Natural Resources will incorporate the other considerations of AIFMA in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvichak drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages

- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that Trout Unlimited requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that Trout Unlimited supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that Trout Unlimited requests that the Department of Natural Resources hold public meetings on the proposed changes to the Bristol Bay Area Plan in the villages that sued DNR as soon as possible, and in other communities.

Adopted this 11th day of March, 2013.

Comment 69 of 497 - submitted on 04/27/2013 at 12:12 PM:

I support the Citizens Alternative for management of Bristol Bay and then watershed of the waters that feed into it.

Comment 70 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so

salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 71 of 497 - submitted on 05/03/2013 at 10:51 AM:

To Whom It May Concern:

I am connected to Bristol Bay through my mother. I and my family are supported throughout the year by the salmon that I harvest commercially and for subsistence purposes that are reared in the land and water of the Bristol Bay region. My father and brother in law hunt for moose and caribou every fall and winter in Bristol Bay and that also provides a healthy food source for my family.

I would ask that AK DNR manage the lands under the Bristol Bay Area Plan with a priority for protecting the health of the fish and game of the area and for keeping the waters of the region clean.

I would also ask that you give the Citizen's Alternative Bristol Bay Area Plan serious consideration as I believe it represents the vision of all who depend on the renewable fish and game resources of Bristol Bay.

Thank you for considering my comment.

Sincerely,

Melanie Brown

Comment 72 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are

the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 73 of 497 - submitted on 05/03/2013 at 09:01 AM:

I believe we need to protect the vast natural resources we have in the Bristol Bay watershed. While I am not opposed to mining in our state, I am opposed to a mine that will destroy, damage, or decimate the largest returning resources (salmon) and all the entities that rely on that continuous annual return of fish. I believe we should not trade one resource for another. I believe we should protect the resource that will continue to offer jobs, beauty, and sustenance to our lands year after year after year. We need to be the "good stewards" of our precious resources and not let greed or political business lobbying influence a decision that will directly affect current and future generations of Alaskans. We are putting too much faith in an industry that is known for failure, has no vested interest in what happens to our land, and is owned and controlled by foreign corporation. I realize a lot of money is at stake and money talks. But sometimes you have to do the "right thing" and not succumb to the pressure, real or implied. Please reconsider your reasons for allowing this to happen and know that YOU could stop it before it's too late and before our wonderful Bristol Bay watershed becomes a super-fund clean up site.

Comment 74 of 497 - submitted on 05/06/2013 at 08:04 PM:

Please consider the Citizens Alternative Plan to the proposed BBAP . All anadromous streams should be protected ...Not just navigable streams.

My family depends on the health of the Bristol Bay salmon runs for our livelihood. The fact that only a fraction of the world's salmon runs still remain puts the burden on Land managers to Create and enforce comprehensive measures to protect Salmon habitat.

Thanks

Tom Bursch

Comment 75 of 497 - submitted on 05/01/2013 at 09:46 AM:

I support the Citizens Alternative Bristol Bay Area Plan

Comment 76 of 497 - submitted on 05/06/2013 at 09:03 PM:

I am writing to voice my disappointment with the 2013 Revised Bristol Bay Area Plan that has been written and urge you to adopt the Citizens Alternative Bristol

Bay Area Plan submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen, and Bristol Bay based businesses. I don't need to tell you how unique the Bristol Bay salmon runs are not just in the state by in the world. This is the last place on the planet where there is an intact watershed supporting such a vast number of salmon and in turn supports a thriving economy based on commercial and recreational fisheries and has supported for many many year a unique subsistence culture. The priority for land used the the Bristol Bay watershed needs to be put on salmon and other renewable resources.

I recommend the State of Alaska Department of Natural Resources incorporate all of provisions in the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Comment 77 of 497 - submitted on 05/02/2013 at 10:59 AM:

I strongly support the Citizens Alternative initiative for Bristol Bay and am confident I am among thousands of fellow Alaskans who agree.

Comment 78 of 497 - submitted on 05/01/2013 at 12:45 PM:

I support the Citizens Alternative Bristol Bay Area Plan.

Comment 79 of 497 - submitted on 05/01/2013 at 03:36 PM:

Please protect Bristol Bay and prohibit any mining in the area. We need to protect the fish and wildlife for Alaskan's, and future generation.

Thank You,

Candace Carroll

Comment 80 of 497 - submitted on 04/19/2013 at 12:00 AM:

I am a lifelong Dillingham resident, I subsist, and I depend on commercial fishing for my living as a boat and drift permit owner. After reviewing the proposed changes to the 2005 Bristol Bay Area Plan, I have several comments ☐

First of all, I do not agree with DNR's decision to remove the habitat designation from 94% of uplands in Bristol Bay, and I do not consider your proposed amendments adequate. The Resource Management designation you have replaced much of these areas with was a seldom used designation in 1984, and should have remained that way. By DNR's definition ☐ RML lands are remote areas with no significant value, priority, or expected development. These lands are all important habitat to birds, caribou, moose, and other animals important for subsistence and should remain under habitat designations.

I heard you explain that DNR based assumptions on how lands are and likely will be used on permits you have received over time ☐ this methodology explains to me how you would have missed the importance of all these lands for subsistence, but it absolutely does not excuse it. ☐ Please restore all habitat designations back to the 1984 plan. These lands are not remote and they do have a priority use.

I also would like to comment on Mineral Closing Order 393 ☐ I appreciate that DNR amended the '05 plan to include the full reach of anadromous streams but I want to be clear that you use the most current state ADF&G Anadromous Waters catalogue.

Thirdly, please apply the same logic to all Anadromous waters and extend the habitat corridors to every stream in the catalogue. Do not apply an arbitrary Navigability standard to rearing salmon. Please do not take the fact that I am the 100th person to tell this lightly. It would be a perpetuation of your own ignorance to continue to contend that not wanting to get too specific when it comes to protecting salmon rearing areas is a legitimate excuse.

I would also like to request that you apply a mitigation requirement to all large scale mining development in the Bristol Bay region such that mitigation of lost salmon habitat must occur in full in the same drainage or hydrological unit, with the same stocks as are disrupted by development.

Finally I want to request that you re-instate the local advisory committee set up in the 1984 plan. Local knowledge of the lands and uses in the Bristol Bay area should be at the basis of our Area Plan ☐ not at the end of an expensive and drawn out litigation process and limited to 3 minute testimonies. Had DNR started with a local advisory committee in 2005, a lot of time and money could have been saved. The best thing DNR could do at this point is to adopt the Citizens' Alternative Plan as the basis of a new BBAP. Thank you.

Comment 81 of 497 - submitted on 05/06/2013 at 12:00 AM:

The Alaska Department of Fish and Game (ADF&G) reviewed the Department of Natural Resources' (DNR) Public Review Draft (PRD) of the Determination of Reclassification and Plan Amendment to the 2005 Bristol Bay Area Plan (BBAP). These changes to the plan are a result of an agreement reached between the Nondalton Tribal Council and the State of Alaska to resolve a petition to reclassify lands in the BBAP. In this agreement, DNR committed to revise specific definitions in the plan, and reevaluate the classification of certain lands and then determine if reclassification is necessary. Areas classified Wildlife Habitat and Public Recreation in the 1984 plan were the focus of this effort.

In preparation for the proposed plan amendment document, ADF&G provided angler effort data and identified caribou wintering and calving areas for the Mulchatna, Northern Alaska Peninsula, and the Southern Alaska Peninsula caribou herds on lands within the BBAP planning area. We did not identify additional moose seasonal use areas since the information provided for the 2005 plan is representative of current use.

The PRD proposes to classify important recreational and anadromous fish streams and the adjacent riparian areas as Wildlife Habitat Land. It would also reclassify a portion of the calving grounds of the Mulchatna Caribou Herd and some moose wintering areas from Resource Management to Wildlife Habitat Land. ADF&G concurs with the reclassification of lands in this northern section of BBAP; however, we have several remaining concerns regarding land use designations on the Alaska Peninsula, as well as some technical corrections.

ADF&G recommends that additional areas within the historic calving grounds of the Southern Alaska Peninsula Caribou Herd (SAP) and the Northern Alaska Peninsula Caribou Herd (NAP), identified on the attached maps, be reclassified as Wildlife Habitat Land. These lands are currently within larger units that are classified as Resource Management Land. The SAP and NAP have been identified as important for providing high levels of harvest, and population and harvest objectives were established in 5 AAC 92.108. Both herds have failed to meet these objectives in recent years. The calving areas occur on state land which provides the greatest opportunity for ADF&G management. Displacing these animals to calving on federal lands would greatly diminish management options.

The southernmost calving area includes drainages that remain especially important to the SAP. The SAP calving ground has been used consistently since it was described as the traditional calving area by Skoog in 1968; these lands were classified as Wildlife Habitat in the 1984 Bristol Bay Area Plan. The identification of NAP calving grounds is not as well defined, likely due to diminished population size. As herd size has declined in recent years, the area of calving by the NAP has become somewhat more dispersed, as indicated in the PRD. We believe this is most likely due to the dispersed calving strategy we often observe when caribou populations are very low. The NAP calving areas have also been described for decades; however, the two more northern calving areas indicated on the attached map describe specific calving areas that have historically been especially important to the NAP. As the herd increases toward objective levels these areas are expected to once again become important for calving.

In addition, we recommend that the language on page 15 of the PRD be revised to more accurately describe the biology of moose and caribou relative to wintering and calving areas. Caribou do calve in concentrations on traditional calving areas. Use of a common calving area is what defines a population of caribou for management purposes. In general, moose are more likely to disperse to suitable habitat during calving and post-calving and aggregate in suitable wintering areas. We recommend the following revisions:

"Caribou (Calving and - delete) Wintering Areas: These areas show no particular concentration and, in fact, there is a fairly widespread distribution of these habitats throughout the planning area ... The location of caribou (calving and - delete) wintering varies throughout this range from year to year and (seasonally in any one - delete) (within - add) year(s - add), and does not exhibit the same concentrated pattern that is characteristic of moose (calving and - delete) wintering areas."

Thank you for the opportunity to review and comment on this Public Review Draft. Please contact me if you wish to discuss our comments and recommendations in more depth. You can reach me at marla.carter@alaska.gov or 267-2013.

Attachments: 2 Caribou Calving Maps

Comment 82 of 497 - submitted on 04/30/2013 at 10:40 AM:

I would recommend you read your original mission statement if you have not amended it yet.

I would like to keep wild Alaska as wild and natural as possible. As one who has first hand experience viewing the results on streams near the recreational mining district in the upper Mat-Su I already know the result of your planned policy on Bristol Bay.

This Alaskan and his family would like mining to be either prohibited or scaled back considerably especially near salmon spawning areas.

Thank You for the opportunity to comment.

Comment 83 of 497 - submitted on 04/27/2013 at 03:44 PM:

I support the Citizens Alternative Bristol Bay Alternative Plan.

But I also wish to say that I do not wish to see the Pebble Mine developed at all. We cannot afford to take chances with polluting streams, diverting streams, etc. in this area. This would devastate the salmon runs and screw up the ecosystem in this part of Alaska. And I have heard that even a little copper introduced to salmon would kill them. Also, any dam put up to hold back poisonous soils and/or water would not hold up if a major earthquake struck. Even a long rainy season, which we often get in Alaska, would put the dam in danger of overflow.

I am a life-long Alaskan and I honor our Native culture and their subsistence way of life. This mine would be just another step taken against our Natives' lifestyle. They cannot exist without salmon, and Alaska's salmon is already dwindling. This mine would be a terrible thing.

Comment 84 of 497 - submitted on 04/19/2013 at 12:00 AM:

- I believe all non-navigable anadromous streams should also be classified as habitat & be under the same protection as navigable anadromous streams.
- All streams should be presumed anadromous unless proven otherwise.
- All caribou calving grounds must be identified and protected & classified as habitat, especially in the Nushagak, and Upper Talarick Creek.
- Subsistence use should be it's own DNR classification category equal to habitat not under it.
- Subsistence use of fish, animals & birds supports my family of six, and also those we share out catch with. Subsistence should be a priority in classification of land use, and determination in permitting & leasing.
- I support the Citizens Alternative Plan
- Elders should get 5 minutes to testify and be allowed to testify 1st.

Comment 85 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 86 of 497 - submitted on 05/01/2013 at 10:02 PM:

I am thoroughly opposed to the Bristol Bay Area Plan and proposed Pebble Mine in the area. When the evidence states that salmon runs WILL NOT return to usual, as our foreign investors would have us believe and people of the area and across the state of Alaska are working on alternative job opportunities for those individuals living in the area - you DO NOT have my support, as a citizen of Alaska, on this plan.

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I (live in, work in, visit) Bristol Bay.

Thank you.

Comment 87 of 497 - submitted on 05/06/2013 at 12:00 AM:

Thank you for the opportunity to comment on the Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and families in coastal communities whose livelihoods are tied to the use of abundant marine and coastal resources.

Revisions to the revised BBAP do not adequately protect the Bristol Bay salmon resource to ensure good management of this critical resource for the people of Bristol Bay and all Alaskans. Therefore, AMCC supports the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 BBAP:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Re-establish the system used in the 1984 plan that automatically reserved water levels for fish.
- Create a Bristol Bay Advisory Board made up of local residents.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries.
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. The BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds, brown bear denning and caribou calving grounds as habitat.
- Salmon spawning streams, whether navigable or not, should be classified as habitat.

AMCC strongly recommends the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Alaska's fisheries are second to none and provide thriving economies throughout the state. Bristol Bay supports the world's largest wild salmon population in large part because of enlightened management of its habitat. It is in the State's interest to safeguard our salmon, and the jobs and economy that are generated from it.

Sincerely

Comment 88 of 497 - submitted on 04/09/2013 at 12:00 AM:

RESOLUTION 2013-40

A resolution supporting the Citizen's Alternative Bristol Bay Area Plan and requesting public meetings in Bristol Bay.

WHEREAS, The Native Council of Port Heiden is the federally recognized Alaska Native tribe serving its tribal members and the community of Port Heiden; and

WHEREAS, Native Council of Port Heiden, acting as the duly elected governing body pursuant to the Constitution of The Native Council of Port Heiden, has the authority to establish relationships and enter into contracts; and

WHEREAS, Our tribes, sportsmen, and commercial fishermen have made every attempt to work with the State regarding our concerns. DNR did no consultation with Bristol Bay residents, tribes, local governments, commercial fishing groups, or others before drafting the proposed changes to the plan

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat

(1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Koktuli River, the Upper Talarik River, and eight streams to south of Pebble block,

(2) navigable anadromous waters in their entirety, including the South Fork of the Koktuli River to Frying Pan Lake;

(3) moose calving and some wintering areas to include the North and South Forks of the Koktuli west of Pebble block:

(4) Western Iliamna Lake which is downstream from the Pebble deposit: and

(5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has

(1) declined to establish a Subsistence land classification category comparable to the recreation category;

(2) declined to classify non-navigable anadromous waters as habitat;

(3) declined to classify much of the moose wintering areas as habitat; and

(4) declined to classify caribou calving and wintering areas as habitat.; and

WHEREAS, The Native Council of Port Heiden expects that the Department of Natural Resources will incorporate the other considerations of the Native Council of Port Heiden in their 2013 Revised Bristol Bay Area Plan to include:

(1) Establishing a Subsistence land classification category

(2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not

(3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvijack drainages

(4) Increasing Habitat Classifications for wildlife and fish

(5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages

(6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining

(7) Encouraging Voluntary Cooperative Planning

(8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish

(9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages

(10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"

(11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the Native Council of Port Heiden requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Native Council of Port Heiden supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Native Council of Port Heiden requests that the Department of Natural Resources hold public meetings in the villages that sued DNR as soon as possible, and in other communities.

Adopted this 26th day of March 2013.

Unit Habitat Designations map attached.

Comment 89 of 497 - submitted on 05/01/2013 at 12:58 PM:

Port Heiden Public Meeting with DNR 2005 Bristol Bay Area Plan

Port Heiden Public Comments:

Brue Phelps did not provide a copy of the Bristol Bay Area Plan

Bristol Bay Native Association Natural Resources Department - Gala Woods however has provided the tribe (NVPH) with an electronic copy for three documents: BBAP, Plan for State Lands 1984, and the Citizen's Alternative Area for state lands

Participant question - The Bristol Bay Advisory Plan's public process seemed to be taken out and will DNR contact us about changes and add to conduct public meetings by the host who makes changes to the Bristol Bay Area Plan and in due process make allowable changes

DNR response - to write in a comment

Participant question - There are subsistence resource areas that we as a tribe have identified in our TEK maps but they are not reflected in this plan

DNR response - supply the map as written Comment Period over May 6th

Participant stated here: Gerda Kosbruk

Participant question - How is this meeting being documented?

DNR response - I, Bruce Phelps am taking note of what everyone is saying by memory and so is John Moller

Participant response - well that's impossible also considering all the villages being visited besides Port Heiden

Participant stated here: Gerda Kosbruk

Participant question - In the Unit 16 Port Heiden handout it states that grazing is prohibited on surface uses does that include reindeer herds?

DNR response - Yes You can contact Dan Prulx Division of Agriculture in Palmer grazing department

Participant stated here: John Christensen Jr.

Participant question - Does the agency DNR have any authority over the mining claims? When the mining claim takes interest in land for resources they also need access to roads, pipeline, containment areas, water and sewer and power projects for the interest of the mine

DNR response - DNR does not have dominion over mining claims, and agrees that they need access to the infrastructure

Participant stated here: Jeff Bringherst

Participant question - Where do you get the information for the 2005 area plan?

DNR response - Alaska Department of Fish and Game

Participant question - We know where all the habitat locations are but we haven't documented them or were asked where they are and what animals, fish and birds we want to see protected in the plan

DNR response - submit a map with the said areas in a comment

Participant Question- How can co-classified and classified have non-conflicting boundaries with habitat use and general land use for subsistence needs as DNR outlines. How does regulation pass land use classification category claimed under habitat without subsistence references as designated in the 1984 Bristol Bay Plan in comparison with the 2005 BBAP the

data loss is totally negating the hard work and input from rural Alaskans for the previous plan which we want represented in today's BBAP 2013

Participant Referenced here is Alannah Hurley of Dillingham

DNR Response: Bruce Phelps □ Land transfers from classified to unclassified are categorized by DNR. DNR doesn't manage subsistence use areas it's managed by ADF&G there is 9.4 million acres under Subsistence Lands under the 9th Clause of Action

John Moller (Subsistence Section of DNR Hearings) - Sean Parnell is hoping to □ streamline □ the permitting process in suggested revisions and it will take out our possibility to speak out against permitting process, what the HB77 and SB26 during the legislative session, because some amendments that go through the government some 26,000 applications sitting on DNRs shelf and because of the load permits things like Bulk fuel from Asia for Cannery Economic Development gets put aside & what is he intending here as he says this?

Ray's Place Meeting Room Discussion □ Why didn't DNR use the past research (versus the one sided view of ADF&G) to designate lands drawn by BLM, BBNA, WASSIP Study in genetics identify salmon spawning streams and a field survey mandate search of considerable effects by mining lease in habitats of blackfish, land otters, etc. whose habitat in PTH range From Cinder River to Cape Seniavian (designated walrus habitat) and other villages like Ugashik, Pilot Point present at the meeting also commented.

Ray's Place Meeting Room Discussion □ Denali Commission granted our Washerteria Program Funds and used the \$1.2 million award and studied it to death and left us with Village Safe Water funds for water filters per individual household with significantly less funds released. On another note we talked about other resources at the Denali Commission for renewable energy and upgrades and how BBEDC supports our village in so many programs and that we submitted a geothermal proposal to AEA that was denied due to an uneconomical because of the small size of Port Heiden and the cost of geothermal energy integration and project management. We need new power lines for the city electricity or new grid placement especially with erosion hindering the Old Village of Meshik.

Ray's Place Meeting Room Discussion □ On General allowed use and non-permit use areas; What guidelines are being used to protect subsistence use in these reasons in these areas what tells the re-judicators or audience for development that certain guidelines are in place as designed by the local knowledge input and subsistence use for the area of concern/permitting.

Glen Alsworth (Lake and Peninsula Borough, LPB) □ [model] Funded Projects in Tyonek and Sand Point and Mother Goose Lake [and they] got good map, Dog Salmon Valley. Oil lease surveyors Kodiak Mountain in Borough Bay, Aleutians East Borough can give oil lease advice. LPB has no big land classification turn over State land and Federal standards statute 29.65.020 transferable equitable public creation co-classified/ habitat/ vs./ re-classification [if lands are containing contamination] Approve Certified Re-Judicated as clean and returned back to the Borough (Bruce Phelps). Big Mountain Fed-State 5 acre process claim transfer DNR Stat is waiting for federal government land transfer re-judicate 25,000 acres by DNR or Borough after 1989 April Selection previous statute (Glen Alsworth). Oil leases outside 3 mile by Fed waters is cleared by state law and borough, 125,000 acre entitlement legislate impossible for DNR to fulfill law contradicts; Solicit by Lake and Pen Borough new guy selected to hear issues in LPB of not transferred lands Ted* rapid response by the government 1955. LPB project in Chignik Harbor unfinished 2012

Participant James □ Jimmy □ Christensen BBAP final comments □ the BBAP and DNR, plus State and Fed agencies, and LPB needs to decide on to unregulated the land and what type of use to designate on the land. He [Bruce Phelps] was trying to make the land more usable for mines because the state mandates that [DNR] make the issue for land use happen to make the state more money

Comment 90 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 91 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 92 of 497 - submitted on 05/02/2013 at 05:12 AM:

Being an avid outdoors person who cherishes the wilderness, I think it would be a great Loss of such a Magnificent country to allow the Pebble Mine to happen. In the early 1980's I hitchhiked to the Great state of Alaska as it was a childhood dream of mine to one day see Alaska. Now there is some foreign company with roots to the US wanted to rape the land all in the name of Dollars and they say there is little reason for concern to he environment! That is such a joke. I have since being in Alaska traveled to others states and have witnessed the horror of Mining and the left over for the people who stay in the area. There life is never the same and the natural wonder is Gone. I currently reside in the Great state of Wisconsin and we are also now fighting our government as they think it is financial/employment gain to allow an iron ore mine to be dug in the northern part of the state. We are fighting this as the runoff will ruin some great fresh spring creeks and then head in the Great Lake of Superior. With out any forethought to the huge hole left in the ground how can they expect people to buy into there brilliant idea. It appears that as long as there is a dollar to be made, someone somewhere is willing to ruin what can never be replaced. God created this world and we are ruining it at a faster rate than Mother Earth can repair. Let's all stand up and speak and use our voice to be heard and say NO to the MINE! We need salmon for the wilderness and also for man to eat, once it is ruined there is no going back!! Thank you and I hope We as a Nation can say NO to this terrible situation. God created One Earth and we need to Protect her as well as we can....

Comment 93 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

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Comment 94 of 497 - submitted on 04/01/2013 at 12:00 AM:

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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

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Sincerely

Comment 95 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 96 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 97 of 497 - submitted on 05/05/2013 at 04:22 PM:

Please support the citizens alternative Bristol Bay Plan

Comment 98 of 497 - submitted on 05/02/2013 at 07:35 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I visit Bristol Bay.

Comment 99 of 497 - submitted on 04/27/2013 at 04:54 PM:

Please work to prioritize Bristol Bays sustainable resources(Salmon) when you make a plan for this area.Thanks Robbie Coffey

Comment 100 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 101 of 497 - submitted on 05/06/2013 at 12:00 AM:

I'm writing in support of increased habitat classifications for fish & wildlife that live in the Bristol Bay area and a prohibition of metallic sulfide mines in our region. I would also like to see mineral closing orders implemented on all salmon spawning streams regardless of navigability. DNR needs a subsistence classification. Subsistence is our culture, and we need to preserve it for our grandchildren and our future great grandchildren so they can subsist like my parents & grandparents did. Our subsistence resources we harvest feed the whole community not just my immediate family.

Also create a Bristol Bay Advisory Board made up of local residents of the different parts of Bristol Bay, so all Bristol Bay residents are heard. I'm in support of the Citizen's Alternative Bristol Bay Area Plan, as a commercial fishermen and subsistence user.

DNR should work with all the entities in the Bristol Bay region to resolve these issues with the Bristol Bay Area Plan to make it work with the different areas of Bristol Bay.

I want Bristol Bay protected as habitat or subsistence designation for all renewable resources. I can't wait to go King Eider hunting. If the mine is permitted and there is a dam failure the poison will impact the mussels in Etlon Point of Bristol Bay and kill all the mussel beds and therefore the Eider's.

Once again I'm in full support of the Citizen's Alternative Bristol Bay Area Plan and the protection of Bristol Bay's natural resources.

Sincerely

Comment 102 of 497 - submitted on 05/03/2013 at 10:29 AM:

Hello Commissioner and other State oversight,

The current approved plan is based on a narrower field of information regarding maps and resource delegation than past plans. The drastic changes in land uses seemed to be based on this reduction. GO BACK to the gathering of the

information, consider the voices of the directions taken by the previous studies and hear the voices of the people in Bristol Bay. REDO the Planning process. Work to complete a plan with a conscious effort to do it for the area. I believe it will set right with the people of Bristol Bay.

Nina Corbett resident of Bristol Bay

Comment 103 of 497 - submitted on 05/02/2013 at 09:03 AM:

I am opposed to the permitting of Pebble Mine .I believe that there is a huge possibility of irreversible damage to the environment that will not be able to be cleaned up. We have way to many screwed up mining operations that have destroyed beautiful places in the past. We dont need more especially here.

Comment 104 of 497 - submitted on 05/06/2013 at 12:00 AM:

I am writing you to express my support for Public Review Draft of the Determination of Reclassification and Plan Amendment to the 2005 Bristol Bay Area Plan as written. I believe that the state's proposed reclassification and plan amendment will adequately protect wild game, salmon, subsistence activities, sport fishing and other public uses while also allowing for the responsible development of state land within the area.

Classifying certain land as a "mineral area" does not mean that a mine has been permitted or will be built. This classification simply recognizes resource potential that could offer a significant economic boost to the region if that mineral potential can be developed in a clean and safe manner.

The Alaskans I proudly represent are hardworking small business owners as well as those employed in fisheries, tourism, forestry, oil and gas, mining, education, and many other industries. As Alaskans we are proud stewards of our resources, and our economy is dependent on the safe and responsible development of those resources. Alaska must be able to consider all types of development on its land in order to make prudent decisions regarding regional resource management.

The Bristol Bay area is a vast and complex watershed; the plan as amended reflects that complex nature and will allow for the maximum benefit of Alaska's resources through multiple uses.

Sincerely

Comment 105 of 497 - submitted on 05/01/2013 at 05:10 PM:

Please honor the proposals contained in the "Citizen's Alternative Bristol Bay Area Plan for State Lands. I have reviewed the 2005 area plan proposal. The substantial decrease in the habitable areas and their protections are sickening. The input from the locals should be considered first inspite of anything else. If we don't protect these lands from ourselves, there will be grave consiquences for our children, and our childrens children. It is a sad day when we sell our cherished beauty for profit. If our hands our tied about the mine, at least hear us.

Comment 106 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 107 of 497 - submitted on 05/06/2013 at 12:00 AM:

Thank you for the opportunity to comment on the proposed Bristol Bay Area Plan Amendments.

The Alaska Miners Association (AMA) is a non-profit membership organization established in 1939 to represent the mining industry in Alaska. We are composed of more than 1,500 individual prospectors, geologists, engineers, vendors, suction dredge miners, small family mines, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, molybdenum, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, and other materials.

In general: AMA supports the amendments.

In general, we support the six proposed amendments to the 2005 Bristol Bay Area Plan (with the possible exception noted below). We believe the 2005 Area Plan struck an appropriate balance between various and diverse stakeholder interests. It contains significant protection to fish and wildlife resources, but also adopts the multiple-use philosophy that is imbedded in the Alaska Constitution.

The proposed amendments increase protection for wildlife habitat. Specifically, as the amendment proposal correctly notes: the cumulative effect of the proposed amendments is that more land in the Bristol Bay region would be managed for wildlife habitat and public recreation than under either the 1984 or 2005 area plans. Overall, the plan amendments do not greatly change land management in the region.

Changes to the mineral designation.

The mineral designation in the 2005 plan includes the statement "includes surface uses in support of mineral exploration and development, including tailings deposition, waste rock disposal, mineral processing facilities, administrative facilities, and residential living quarters." The amendment proposes to delete that language from the text.

Those opposed to mining in the Bristol Bay area have alleged that that mineral designation does not necessarily mean that the designation supports mine facilities and have argued that it is illegal to locate mine facilities in mineral closures. This argument is, of course, legally incorrect. A mineral closure closes an area to mineral staking only. While a mineral closure prevents a claimant from gaining a property right to the minerals in that area (i.e., a mining claim), it absolutely does not restrict the more detailed permitting process from locating facilities at the most appropriate location, which could be in a closed area. In some circumstances, such as mitigation reasons, closed locations may be appropriate places for mining or mine facilities. A permitting process that is done based on science determines what is best for the environment, wildlife, and human health. Mineral designations should not prevent permitting agencies from making the best decision on placement of facilities, or otherwise.

AMA has concerns that the proposed amendment to modify the mineral designation definition will give unintentional support to these anti-mining groups' erroneous arguments. Therefore, we believe that it is crucial that in the public record that accompanies the plan - the response to comments or other documents, DNR must make it crystal clear to the general public that 1) mineral facilities may still be appropriate as determined by the mine permitting process; and 2) a mineral

closure absolutely does not foreclose facilities or even mining within the closed area if the more detailed permitting process determines that it is appropriate. If the record makes this long-held interpretation clear, then AMA holds no objection to the change. If the record does not make this intent clear, then we strongly object to the change. The change, without the accompanying clarification, will provide support to a dangerous and new interpretation of law.

Changes significantly beyond DNR's proposed amendments are illegal without additional public process.

Changes to the 2005 plan that would go significantly beyond what was proposed in the public notice cannot be legally done without additional public process. It is an abuse of the process and illegal to advertise one change and then adopt something greatly beyond the scope of what was advertised. DNR cannot legally introduce completely new concepts and changes without another entire process. Therefore, proposals such as those made by certain anti-mining groups, such as to classify the entire area as wildlife habitat, cannot legally be adopted without additional public process.

The Lake and Peninsula Borough should receive its Municipal Entitlement.

The 1984 Bristol Bay Area Plan used a broad habitat classification for almost all of the area. The Area Plan was adopted before the Lake and Peninsula Borough was formed. While the Legislature granted the Borough an entitlement of 125,000 acres, the 1984 plan prevented the Borough from selecting its land. One of the main reasons that the plan was revised in 2005 was to allow the Borough to select its land. AMA understands that the Borough has a remaining entitlement of 40,000 acres. Any changes to the plan should not inhibit the Borough's ability to gain its promised entitlement.

No subsistence classification.

The information distributed with the proposed amendment makes clear that DNR does not intend to adopt a subsistence classification or designation, and AMA supports this decision.

In summary, AMA generally supports the amendments to the Bristol Bay Area Plan and a comprehensive management plan for the Bristol Bay region. Thank you for the opportunity to comment.

Sincerely

Comment 108 of 497 - submitted on 05/06/2013 at 12:00 AM:

DNR has a constitutional obligation to manage state-owned lands for the "maximum public benefit" based on the directive in Article VIII Section 1 on the Alaska Constitution: "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." Sole designation of large sections of the state for wildlife or recreation is contrary to constitutional mandates. Banning certain activities in an area plan ignores constitutional mandates that include development and multiple use.

Multiple uses should include mining (exploration, leasing and development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.

Alaska contains known deposits of Rare Earth Elements (REE). Many of these REEs are imported to the United States, often from countries with lesser environmental regulations. According to the Mineral Commodities Summaries 2012 report by the U.S. Geological Survey, the U.S. depended on imports of 50-100% of needs for 43 minerals in 2011, some of which are found in Alaska. Keeping areas open to mineral extraction in Alaska not only provides the opportunity for future responsible resource development, it may also improve national security, and provide economic benefits to the region, as well as improve or add infrastructure and access to areas for multiple use - example is cheaper energy costs.

The area included in the BBAP should be further evaluate for mineral potential before restrictive land designations are implemented. Sufficient mapping and geological information should be acquired, and until then, the area should be left open to all uses.

Sincerely

Comment 109 of 497 - submitted on 05/01/2013 at 12:53 PM:

May 1, 2013

To Whom IT May Concern,

I strongly recommend the State of Alaska to adopt the Proposals contained in -Citizen's Alternative Bristol Bay Area Plan for State Lands.

For the last 25 years I have been traveling to Bristol Bay Region for both work and recreational pleasure. The work in Bristol Bay is as a Commercial Fisherman and the pleasure is as a Salmon/Trout Sports Fisherman.

I Commercially fish in the Kvichak River section of Bristol Bay. The spawning ground for the fish I catch comes from areas that will be negatively affected by the Pebble mine. A drop in fish return would put me and my family out of business. My fishing business supports fishing suppliers in both Alaska and the Lower 48. Adding up the expenses and Taxes spent in Alaska they total up in the Thousands.

I have been fortunate to make the trip from Bristol Bay to Homer, by boat, on several occasions. Each time I do I marvel at the beauty of pristine land and water. What a shame it would be to lose all this to a mine fault or accident.

Reviewing the current Bristol Bay plan I have detected changes needed to protect the 12 million acres and its people from Mine development harm.

Please adopt the Citizens Alternative Bristol Bay Plan for State Lands.

Comment 110 of 497 - submitted on 05/03/2013 at 12:00 AM:

I am writing in response to the Bristol Bay Area Plan. The revised plan does not include consideration for renewable resources and clean water which is vital to a healthy ecosystem and to the people dependent upon these resources.

Land management decisions need to include plans for long term sustainability of the area and the communities in the area. People living in this region have traditionally relied upon clean water and the abundant marine and wildlife resources to maintain their traditional way of living to include fishing and hunting. The commercial fishing industry, which depends on clean water, brings in \$100 million dollars of sustainable revenues into the region. This is economically significant.

Habitat conservation is probably the single most important factor for maintaining healthy salmon runs. It must be considered as a means to protecting these important natural resources. Don't allow outside corporate interests with short term monetary plans to destroy a civilization that has thrived for millions of years on this resource. Learn from the mistakes made from people Outside and see what horrible damage has been done to not only the people, but to entire regions when managers fail in their duty to manage for the public interest.

I urge you to include revisions that an automatic instream flow protection for salmon.

- Use of the precautionary principle when making decision that may significantly impact salmon.
- Use a presumption that all waters of the Bristol Bay region are anadromous.
- Prohibit metallic sulfide mining in the Nushagak and Kvichak watersheds.
- A new mineral closing order that would ban all new mining claims on and around salmon spawning streams potentially threatened by mining.

I urge you to include these revisions in the revised Bristol Bay Area Plan.

Sincerely

Comment 111 of 497 - submitted on 05/01/2013 at 01:38 PM:

Please stop the development of the mine. There is too much to be lost for the state, the people and the animals of the beautiful area only for the benefit of a few people ! The jobs will not last nor will they be created for Alaskans they will only be for the employees of the mine...The waste from the mine will remain in Alaska forever and if there were to be an earthquake their "safe " storage area will falter and pollute and kill the entire area!

Stop the Mine NOW!!!

Comment 112 of 497 - submitted on 05/01/2013 at 02:47 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I work in Bristol Bay.

Comment 113 of 497 - submitted on 05/02/2013 at 08:02 AM:

I support the Citizens Alternative Bristol Bay Area Plan.

Comment 114 of 497 - submitted on 05/02/2013 at 12:00 AM:

Please adopt the Citizen's Alternative Plan for Bristol Bay

Thanks

Comment 115 of 497 - submitted on 05/01/2013 at 12:22 PM:

Please consider taking a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on protecting the rivers, streams, and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I choose to spend my money to travel to and visit Bristol Bay.

Comment 116 of 497 - submitted on 05/06/2013 at 12:00 AM:

Protect Bristol Bay's Renewable LIVING resources and Keep the Water Clean. Many "systems" are being negatively impacted. Adopt the Citizens Alternate Bristol Bay Area Plan.

Comment 117 of 497 - submitted on 05/01/2013 at 10:30 AM:

This project is the wrong mine at the wrong place at the wrong time. Further it is the WRONG PLACE... Save this Bristol Bay from pollution that will happen regardless of promises from anyone. It is truly penniwise and dollar foolish. An EMPHATIC NO to Pebble Mine ... Not Now Not Ever..

Comment 118 of 497 - submitted on 04/30/2013 at 09:43 AM:

The 2005 BBAP did not strike the right balance to protect subsistence, fish and wildlife. The residents of the Bristol Bay region have provided their perspective on the BBAP in the ballot box and in the Citizen's Alternative Bristol Bay Area Plan. I support the Citizen's Alternative Plan as a comprehensive, science-based vision for Bristol Bay land management that is supported by local people.

Comment 119 of 497 - submitted on 04/23/2013 at 12:00 AM:

The 2005 BBAP is an abomination and should be scrapped.

A) In general I strongly support the recommendations of the Citizen's Alternative.

B) I deeply object to Table 1, Third Cause regarding salmon habitat (P 10, 35): DNR's position is irresponsible and will eventually threaten our salmon populations. Salmon habitat does not stop where navigability ends; those smaller waters are extremely valuable for spawning and especially rearing and providing food for juvenile salmon. The vast premium quality salmon habitat of the Bristol Bay uplands underpins our subsistence, commercial and recreational fisheries. This plan should not be allowed to compromise the salmon habitat.

The explanation I received at the April 19, 2013 hearing in Dillingham is NOT sufficient reassurance that salmon habitat will be protected. Restore 1984 plan standards AND add all newly recorded Anadromous Waters as salmon habitat. Better, I support the presumption of anadromous species in all flowing waters.

C) The Lower Talarik Creek: The Special use area should be expanded to include the whole watershed of this world renowned trout and salmon water. It is important to subsistence users as well as recreational users and contributes salmon to the commercial fishery. If the whole watershed cannot be made a special use area: mineral exploration and development must be prohibited. Public access to this area for subsistence and recreational use should be the highest priority. The watershed has been a valuable big and small game hunting area as well. If development occurs in the upper portions of the watershed, it will likely destroy the value and intent of the established Special Use Area, as well as a fishery known world wide.

At the April 19, 2013 hearing I learned there are drilling rigs working in the Lower Talarik drainage. THIS IS CRIMINAL. The Lower Talarik is one of the top 3 to 4 large rainbow trout fisheries IN THE WORLD. As a former state of Alaska fisheries biologist I had numerous anglers tell me so as they fished this small water. Anglers who had the ability (and exercised it) to fish anywhere in the world - yet they claimed there was NOWHERE else like Lower Talarik. To allow mining and or exploration in this drainage is to threaten the prestige of Alaska angling overall. It utterly destroys the credibility of the state of Alaska, DNR and ADFG having any serious interest in responsibly managing Alaskan's resources.

Mine exploration drilling should be stopped immediately in the entire Lower Talarik drainage and mine claims denied. The Lower Talarik watershed should be included or added to the Mineral Closure Order PERMANENTLY. To do any less totally defeats the purpose of the Special Use Area surrounding the lower reaches of Lower Talarik Creek.

C, 1) The history of the Lower Talarik Creek Special Use Area must be included in the plan. The current Special Use Area at Lower Talarik Cr. was a result of a carefully coordinated effort by ADFG Sport Fish, DNR, The Nature Conservancy and a member of the Anelson family who had a Native Allotment claim surrounding THE MOST VALUABLE angling portions of the lower reaches of the creek. Five acres remain in the possession of the Allottee's estate and heirs for access and use for subsistence activities as well.

Many anglers from all over the world contributed something like \$400,000 to secure the rest of the Native Allotment for public use and access. The Orivs company lead much of the fund raising and made a substantial contribution to the effort.

One of the conditions for ceding the allotment was for the state to create a special use area to assure public access to the prime angling waters. As the agreement was made, the Allotment was awarded to the Allottee by the US Government, upon the death of the Allottee (a couple years later), funds were to be awarded to the estate, the allotment ownership transferred to The Nature Conservancy. Then DNR was supposed to create the Special Use Area with guidance and input from the Bristol Bay Area Sport Fish Biologist of ADFG. For several years the Sport Fish biologist submitted information to DNR and there was no subsequent action to create the Special Use Area (SUA). The biologist at the time, Mac Minard sought to get the whole Lower Talarik Creek watershed as a Special Use area; what point is there to create just a small angling area when its the whole watershed that supports the huge rainbow trout? I think the ownership and management of the lands were to be transferred to the State of Alaska upon formation of the SUA.

In 1998 I became the Bristol Bay Area Sport Fish Biologist, moving up from the assistant position. I began working on the stalled SUA. After numerous calls to DNR the old paperwork submitted by Sport Fish was located by Rick Thompson of DNR. After numerous more phone calls Thompson reviewed the application and declared that the whole watershed could not be made a SUA. I discussed options with Thompson and he would only allow me to apply for the area within the current SUA boundaries. I submitted a revised application. And then I called Rick Thompson once a month to get that application moving and through the system. Finally after, a two + year effort, the SUA was finalized and all the terms of the original agreement with the Allottee, TNC, ADFG, and DNR were completed. I feel after an initial good faith effort on DNR's part creating the agreement, DNR dragged its feet and resisted the SUA.

Out of respect for the original Allottee, heirs, and the widespread public support for the SUA, and to protect this unique resource, The Bristol Bay Area Plan should further protect and enshrine the Lower Talarik Cr. WATERSHED as a SUA in its entirety. I may have erred slightly in some details but this is close. I'll be happy to help dig up the exact details if you like.

D) Restore all lands classified as habitat(s) per the 1984 Plan. Its my understanding that this classification does not preclude development eventually but gives the land standing or co-priority use as fish and wild life habitat. The 1984 classifications were carefully developed and should not be discarded. If better habitat data is available it can be considered but there should be references cited and rationale explained in plain English.

E) The Alaska Dept. Fish and Game official comments should be made public as part of the record of the plan draft.

F) State lands in the vicinities of Bristol Bay communities should be designated for subsistence harvest of firewood.

G) Background Section, pp 2-8 BBAP Determination and Amendment: I object to the land designation philosophy / system used in 2005 and prefer the system used in 1984. Lands classified as Resource Management Land or General Use under 2005 plan does not sufficiently convey the importance of these lands as fish and wildlife habitat or as used by local residents. I fear these designations could too easily allow their habitat and subsistence values to be over-looked and lost in the long term.

For instance on Page 5:

"DNR therefore has increased reliance on the General Use designation²⁴ because this designation recognizes that a variety of uses and resources can occur within management units, especially those of large size that are not expected to be developed during the planning period."

It is not enough to have these words claiming to recognize other uses in the definition. I want the reassurance of seeing maps and documents designating lands as Habitat, Recreation etc. very prominently where they demand attention and respect.

H) I agree with Jeff Parker regarding DNR's inconsistent logic in this draft plan: As presented in Dillingham April 19, 2013; in some cases DNR justifies breaking down large habitat units because they are "too big" yet other places claims they want to avoid small units in the plan. An example is DNR's effort to end Salmon Habitat at navigable water ways. Be

consistent. Keep in mind the large wild animals of Bristol Bay, Moose Bears, Caribou, wolves, wolverine need large unfragmented habitats to survive; so do salmon.

I) Maps need to be more consistent in colorations. I found it very difficult to sort out the plan when mineral areas are green on one map and brown on another - like Map 1 and Map 2 on the Amendment website.

J) I support Dick Russell in his April 19, 2013 Anch. Daily News Compass article:

<http://www.adn.com/2013/04/17/2868528/compass-bristol-bay-plan-should.html>

K) A subsistence use priority for some lands and waters should be included in this plan where data shows heavy use.

L) A second public review period of the revised plan should be provided at a time when the public has a reasonable opportunity to reflect on it. Say October 2013.

M) The entirety of Kaskanak Creek and Peck's Creek should be salmon habitat not just a portion. If I'm reading map 3 correctly.

N) Some of the creeks on map 3 show only partially in red. I'm not sure I understand what that means. If some middle portion of a stream is salmon and fish habitat then at minimum, all reaches down stream should also be designated habitat.

O) Upper Talarik Creek should be co-designated as salmon habitat. It supports a very strong return of sockeye salmon annually as well as supporting rainbow trout, grayling, Dolly Varden and other resident species. Probably some silver salmon and other salmon species use this small river.

P) Many if not all of the following units where under "General Use" the priorities are protection of fish and wildlife, should be changed to include a co-designation as habitat.

Q) DNR was lazy writing these proposed amendment tables. The table sections should have been presented in the SAME FORMAT as in the 2005 plan Resource Allocation Tables (like pages 3-73 to 85) with complete column headings: especially Unit Number and Name, Management Intent and Resources, Uses, Additional Info. The format provided in seems designed to discourage comparisons and commenting.

Kisaralik Lake and upper Kisaralik R. R2-02 this area should be designated Public Recreation and Salmon Habitat. This area is incredibly scenic, the small falls is locally known as "the Golden Gate". The Kisaralik is an important salmon producing river for the lower Kuskokwim and is highly valued as a producer of subsistence fish for the nearby communities of Kwethluk, Bethel and others.

Goodnews River: All forks of this river are highly valued for subsistence uses by the villages of Goodnews, upper reaches by Togiak and Twin Hills, possibly Manokotak. The plan should recognize these important uses. Recreational use co-designation would be appropriate as its highly valued for rafters and anglers.

R3-05 Weary River: Should be moose habitat and subsistence/ recreation priorities. This area is heavily used by Manokotak, Dillingham & Aleknagik residents for hunting in the winter some in the summer.

R5-02 Nunavaguluk (Snake) Lake: Ice Creek has strong runs of sockeye and some coho, pink salmon, rainbow trout. Portions of the drainage are important moose habitat much of the year, until the snows get too deep. This area should be considered subsistence/ recreation priority.

R5-03 Table Mt.: Subsistence / recreation uses should be recognized. From the description and recommended use in the 2005 plan, this area should be designated Recreation and Habitat instead of the General Use. This area is heavily used by Aleknagik, Dillingham, possibly Manokotak. The Muklung supports a small but valued king salmon run as well as coho, pink, sockeye, probably some chum.

R5-13 Muklung Hills, Little Muklung: Moose are found and hunted along the Little Muklung as well as waterfowl. Caribou are known to use the area in the summer early fall when the caribou population is large.

R5-20 Nushagak R. east of Dillingham: The lowest reaches of the Little Muklung, and Black Slough and especially tidelands & shores of the Niushagak R (north shore) are extremely valued for subsistence salmon fishing sites particularly during the king salmon run. This area provides important water fowl hunting and probably rearing habitat (north & south shores). Some subsistence eggng may occur in this area. Moose are found in the brushy margins of the streams and are hunted. Caribou are known to use the area at times and brown bear as well. Subsistence designation should be considered. I participate in these uses in this area annually.

R5-22: If I understand the amended list properly, I support the designations of " Rd and Ha - Public Recreation and Tourism-Dispersed, and Habitat" for this area. Good!

R5-23 to 34 except Portage airport and townsite: should have the same designation as R5-22. In fact MOST of the light blue on Map1 including R5, 6, 10, 11, in the Nushagak drainage not immediately adjacent to existing settlements should be salmon, bear, moose and caribou habitat. R5-32 it is silly to have this GU when it so closely adjoins moose calving habitat.

Thank you for the opportunity to comment.

You may contact me if you have questions.

Photo showing Pebble Drill Rig, Lower Talarik Creek & Lake Iliamna included.

Comment 120 of 497 - submitted on 05/01/2013 at 11:45 AM:

I have looked over the 2005 Bristol Bay Area Plan set forth by the state, and as a fisheries technician with the Alaska Department of Fish and Game, I do not believe it focuses heavily enough on protecting the water resources of this area. Recreational and commercial fishing simply can't be ignored as a vital and permanent part of our economy. These boom-bust money-making plans don't do us good in the long run, and the destruction of one multi-million dollar economy for another isn't a balanced way of managing resources.

Comment 121 of 497 - submitted on 05/06/2013 at 06:01 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I work in Bristol Bay.

Comment 122 of 497 - submitted on 04/29/2013 at 12:57 PM:

I support the Citizens Alternative.

Comment 123 of 497 - submitted on 05/01/2013 at 12:00 AM:

It has come to my attention that not only has the 1984 Bristol Bay Area Plan been eviscerated and subsequently supplanted by a Bristol Bay Area Plan doctored in 2005 to pave the way for unwanted mining in Bristol Bay, but also, if your office's 2005 plan is any indication, that democracy and democratic rule have been and continue to be severely and unremittingly impinged by those few-in-number whose act(s) and/or omission(s) have given rise to these issues about which I am now writing.

Be advised that the citizens residing in and around Bristol Bay have created a plan that more closely adheres to the needs and preferences of a vast majority of those natural, human persons in whose trust, in this democracy created by the consent of the governed, you have been granted permission by the consent of the governed to earn some role. Particularly, the Citizens' Bristol Bay Area Plan requests that you and the Department of Natural Resources rely on better science and more accurate and complete mapping to designate primary uses and to improve public participation in these all-encompassing and essential matters; that your division at the Department of Natural Resources commit to area assignments more consistent with both the vision statement of the Bristol Bay Visioning Project and the history of state, federal and local government efforts to balance conservation and development in the Bristol Bay drainages and, consistent with rule-of-law and with and by the consent of the governed, requests that your division commit to a more accurate and broad based definition and application of commonly used definitions on which your division relies which, in turn, encompasses and defines a word such as "habitat" without unduly relying on a single species, namely, walrus.

I have been advised that the recommendations of your office do not end with the aforementioned and rather narrow and strange definition of the word "habitat", which you have made applicable to only a single species but, so too, in other equally important matters. For it appears, if the Department of Natural Resources wishes to continue to act with the consent of the governed, that the Department of Natural Resources should include in the Department of Natural Resources' own revised Bristol Bay Area Plan the following:

- A subsistence land classification category.
- Classification of all anadromous waters as "habitat", regardless of commercial or human navigability of said waters
- Increased habitat classifications for fish and wildlife
- Prohibition of metallic sulfide mines in the Nushagak and Kvichak drainages

- A new mineral closing order banning new mining claims on or along all salmon spawning streams threatened or to be threatened by mining, mining waste, and/or mining operation(s) of any kind(s)
- Voluntary cooperative planning including all human, natural persons in the Bristol Bay Area
- Water level protections for fish at least as stringent and complete as in the 1984 plan, such that in Bristol Bay water is automatically reserved for fish as should have already been codified-in-law
- Conclusive, non-speculative proofs that no harm to fish will result, either directly, indirectly or consequently, as a result of waters having been taken out of or having been modified in any ways in the Bristol Bay Area by any mining operation consisting of human, natural persons of and in any number greater than one (1)
- Creation of a Bristol Bay Advisory Board, codified-in-law to include natural native tribes persons and all natural persons who shall be elected to exclusively represent all of the human, natural-person residents of the Bristol Bay Area
- Immediate and comprehensive implementation of the Precautionary Principle, as the Precautionary Principle was historically first adopted by the Alaska Board of Fisheries
- Rule(s) requiring that if any mining or mining proposal(s) affecting any aspect(s) of the Bristol Bay Area or any area(s) of the State of Alaska is/are not known, that the Alaska Department of Natural Resources and the Alaska Division of Mining, Land and Water Resource Assessment and Development Section will err on the side of caution by prohibiting any aforesaid mining or mining proposal(s) from being created or established or opening.

I do hope that a more balanced view, if adopted by the Alaska Department of Natural Resources, will enable representational, democratic government to flourish in the State of Alaska by the will of the people, the citizens themselves while, simultaneously, preventing recurrence of historical environmental disasters such as that or those attributable to the oil tanker Valdez commencing in the year 1988 or 1989. Please advise.

Sincerely

Comment 124 of 497 - submitted on 03/26/2013 at 12:00 AM:

As a fishing guide in the Bristol Bay region, Environmental Studies major and logical person, it only makes sense to protect the Bristol Bay area from mining operations.

Why put such a blatant risk on your salmon, which are the most essential part of the food chain in your Alaskan ecosystem. In all of history there has never been a mine that had no negative effect on the environment. Pebble Mine and any mine after will be no different.

Please seriously consider revising the Bristol Bay Area Plan by making it more apt for the salmon and wildlife populations to flourish. Life is not all about money. Nature's beauty and conservation for future animals and humans alike should take first priority. Thank you.

Comment 125 of 497 - submitted on 05/02/2013 at 12:00 AM:

I am writing to put my views of the proposed amended Bristol Bay Area Plan on the record. For as long as I have represented Bristol Bay in the State House, I have heard concerns from my constituents about the 2005 Area Plan. I was aware of the lawsuit brought against the Department of Natural Resources by six Bristol Bay tribes as well as commercial fishermen, and I welcomed news in 2011 that the state had agreed to revise the plan.

However, while many of DNR's proposed revisions do improve the plan adopted in 2005, there remain many shortcomings.

Among them, in my opinion, is the failure to include subsistence as a land use category. There are many parties interested in the wellbeing of Bristol Bay, but my outlook is primarily from the perspective of the watershed residents I serve as a legislator. The vast majority of people who live in the region depend on subsistence resources. It is puzzling to me that while the department sees fit to designate specific land use categories for recreation (including recreational hunting and fishing) and minerals, it chooses to fold subsistence use into the habitat designation. In my opinion, subsistence warrants a distinct designation.

When it comes to habitat classifications, the amendments proposed by DNR do not go nearly far enough in restoring the vast tracts of habitat stripped from the 1984 plan in 2005. I am troubled that areas for caribou wintering and calving and moose wintering are not designated as habitat. These areas are obviously critically important to game populations and to the people who rely on this game for subsistence. It seems simply illogical not to designate these ranges under habitat use.

Likewise, it makes no sense to limit salmon habitat designations to navigable waters only. Even the greenest biologist knows that salmon spawning and rearing takes place in streams and reaches that are not navigable to boat. Respected studies have shown that the resilience of Bristol Bay fish populations depends on varied spawning and rearing habitat. Non-navigable waterbodies are part of that crucial diversity. It is irrational to exclude them from the habitat designation.

Finally, I would like to reiterate the concerns that many constituents brought to me regarding public meetings on the amended plan that DNR held in the Bristol Bay region while the official public comment period was open. People were confused over whether statements delivered at the meetings would make it into the official record, and they were frustrated to learn that comments not submitted in writing were merely summarized in note form to be pondered later in aggregate. I encourage DNR to give genuine consideration and weight to the notes they brought away from those meetings. At the very least, I hope that the remarks officials heard have helped the department grasp the depth of Bristol Bay residents' desire to properly protect and manage the watershed they depend on.

Thank you for taking the time to consider my comments. I urge the department to revise its amendments to the Area Plan to more accurately reflect the biological realities in Bristol Bay.

Sincerely

Comment 126 of 497 - submitted on 04/30/2013 at 10:30 AM:

I strongly support the Citizens Alternative Bristol Bay Plan. My business, my livelihood, and my recreation all depend on a healthy Bristol Bay area that is managed with fish and game foremost in mind. I strongly oppose the Pebble Mine.

Comment 127 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. I have floated and fished in this region and it needs the strongest land and water protections as possible. Thank you.

Sincerely

Comment 128 of 497 - submitted on 05/01/2013 at 11:29 AM:

I am against Pebble mine in every way!!!! Thank you

Comment 129 of 497 - submitted on 04/30/2013 at 02:09 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments, along with the Citizens' Alternative Bristol Bay Area Plan. I endorse the Citizens' Alternative and its approach in managing state lands. The State's plan does not emphasize the importance of recreational fishing thus leaving rivers, streams, and lakes unprotected and vulnerable. This is surprising because of the fact that this area supports a well-established multi-million dollar portion of Bristol Bay's local economy. I support and endorse the Citizens' Alternative Bristol Bay Area Plan because it represents the reasons why I *work* toward protecting Bristol Bay.

Comment 130 of 497 - submitted on 05/03/2013 at 11:23 AM:

Our daughter and son-in-law live in Anchorage and my husband's family has lived in Alaska since the 1940's. When we read about the proposed 2005 Bristol Bay Area Plan and proposed amendments we felt we needed to comment. Even though we do not get to enjoy all Alaska has to offer on a regular basis we do travel to Alaska to visit family and to enjoy what nature has to offer, in particular the fishing. We believe the State plan does not place enough emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why we visit Bristol Bay.

Comment 131 of 497 - submitted on 03/27/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the AK-DNR failed to consult in a meaningful way with the people of Alaska during the 2005 B.B.A.P revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral closing order that would ban new mining claims on a or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents.
- Implement the precautionary principle when making and management decisions as it was originally adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.

Subsistence is the heartbeat of our culture in Bristol Bay and Bristol Bay Area plan needs to include subsistence as criteria or land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area plan into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 132 of 497 - submitted on 05/06/2013 at 12:00 AM:

This is an official letter of comment on the Bristol Bay Area Plan from the Nondalton Tribal Council (hereafter, "NTC"). It is the determination of the NTC that the BBAP is currently incomplete and does not meet the minimum state requirements for this document as it relates to Nondalton tribal interests, and will also be inadequate to support anticipated permitting and compliance steps that will necessarily follow implementation of this document.

On April 17, 2013 the DNR held a meeting in Nondalton regarding the 2012 Bristol Bay Area Plan Amendment. As reported at the meeting, the Nondalton Tribal Council (NTC), the governing body of the federally-recognized Nondalton Native Village, has been administering a project for an Integrated Resource Management Plan (IRMP) for the last four years. We are in the preliminary stages of the final plan for this project. We are in possession of data accumulated through the IRMP process that must be included within the BBAP if the latter report is to be complete. This information includes several maps, ethnographic data, and the summary IRMP report. Taken together, this information clearly demonstrates that the survival of our culture and lifeways requires: 1) access to fish, wildlife, plants and subsistence uses of these resources and 2) continued access to and expression of other dimensions of Dena'ina heritage and traditional land/resource use. The BBAP does not address, nor identify protection measures for the significant amount of heritage and subsistence resources within the area of potential effect, including resources not only in the Nondalton area but throughout the Bristol Bay region that are integral to Nondalton social, economic, cultural, and religious practices. Based on our own IRMP documentation for the Nondalton area, it is clear that the BBAP omits reference to significant geographical areas and entire constellations of resources that are necessary for the continuation of these practices. This is vital information that needs to be included in the BBAP so that these areas and resources be fully considered as part of the analysis.

For the IRMP we have focused our efforts on two watersheds, Chulitna River- the "breadbasket" for the residents of Nondalton, which has supplied not only a significant proportion of our subsistence resources, but has also been a center of commercial trapping for tribal members, and is rich in cultural significance, encoded within our oral tradition. We also include in our IRMP analysis the Sixmile Lake area, which sits adjacent to our main village of Nondalton. Together, these two areas constitute a huge watershed that is all connected to the larger study area addressed in the BBAP (with Chulitna River draining into Lake Clark, which drains into Sixmile Lake, which drains through Newhalen River into Lake Iliamna, and on down the Kvichak River to Bristol Bay). The people of Bristol Bay are all connected by this watershed. Our connection to the natural environment surrounding our homelands goes much deeper than the subsistence resources we use and that are documented and reported by the Alaska Department of Fish and Game (ADF&G). The ADF&G reports may show basic harvest statistics, but these numbers scarcely tell the whole story, simplifying our use of the Chulitna-Sixmile area to quantities of meat and fish, which omitting all of the rich social, economic, cultural and religious significance of that area. To rely solely on ADF&G data for the analysis of effects on Nondalton is absurd and does not meet the letter or intent of state and federal laws pertaining to the BBAP.

The State of Alaska has opened a large amount of land in the heart of our subsistence resource use area, an area that is sacred to Nondalton residents, for mining exploration. Already, even at this stage of their work, our community is being profoundly and adversely affected by this exploration by Pebble and other mining companies. Nondalton is one of the closest communities to the Pebble site. We have numerous visits to our community from reporters, researchers, mining companies, and their promotional representatives. Their nearly constant visits, phone calls and emails place a tremendous and uncompensated burden on the Nondalton Tribal Council and staff. Additionally this has added to the stress of the leadership and community residents. We lack the technical staff and financial resources to conduct our own assessments (and have had to secure very small grant support to undertake the IRMP). We see changes in the movement and behavior of subsistence game species that use the proposed Pebble area in response to their exploration and disturbance. The mining companies and their representatives actively lobby in our communities without our consent, seeking to sway public opinion and sometimes dividing the community on highly sensitive issues; it is tearing us apart as a people. DNR has opened the door to a billion dollar effort for mining exploration without providing any resources for the local communities and governments to deal with the influx of people, the ugly politics, and a variety of technical issues that we don't have the expertise to meaningfully address. We are left to watch what takes place in our homeland, with the very resources needed to support the survival of our community and our families, without the opportunity to take a meaningful

and full part in the BBAP process. With the amended BBAP as it is currently written, the doors to mining exploration will be open even wider. The DNR has to consider in this new plan the huge impacts already created by mining in our region.

We therefore make the following minimum recommendations:

- 1) The maps provided at the Nondalton meeting and on the DNR website should show all geographical features and watersheds affected, including the Chulitna-Sixmile watersheds, on a USGS topographic background. The maps provided were not easy to read and understand.
- 2) The entire watershed along Chulitna River up to Long Lake and the entirety of the three Nicovena Lakes need to be protected as habitat for fish, game and plant species essential to Nondalton Dena'ina subsistence, economic, and cultural practices.
- 3) The Sixmile Lake, Newhalen River and land surrounding the village of Nondalton need to be protected as habitat for the same reasons.
- 4) The DNR must conduct or authorize a thorough study on the heritage values of the entirety of Bristol Bay, this needs to include Native place names, burial sites, sacred sites, traditional use over time, and archeological sites that are likely to be affected and are protected under a number of state and federal laws.
- 5) The DNR must conduct or authorize a health assessment with Bristol Bay residents that addresses current project impacts of mining exploration in the region on the physical and psychological health of affected communities, as well as the projected health impacts of proposed mining activities.

Until these elements are seriously considered, and incorporated into the BBAP analysis, we will view that analysis as incomplete and reject the BBAP findings outright.

We thank you for your consideration and await your response.

Sincerely

2 Maps Attached: 1. Nondalton Dena'ina Heritage and Traditional Use; 2. Nondalton Subsistence Use

Comment 133 of 497 - submitted on 03/18/2013 at 12:00 AM:
RESOLUTION # 03-08-13-2

A Resolution requesting that the Department of Natural Resources incorporate all matters specified below into its 2013 Revised Bristol Bay Area Plan, and supporting the Citizen's Alternative Bristol Bay Area Plan, and requesting public meetings and hearings.

WHEREAS, The Nondalton Tribal Council is the federally recognized Alaska Native tribe serving its tribal members and the community of Nondalton; and

WHEREAS, the Nondalton Tribal Council, acting as the duly elected governing body pursuant to the Constitution of Nondalton Tribe, has the authority to establish relationships and enter into contracts; and

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat

- (1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Koktuli River, the Upper Talarik River, and eight streams to south of Pebble block,
- (2) navigable anadromous waters in their entirety, including the South Fork of the Koktuli River to Frying Pan Lake;
- (3) moose calving and some wintering areas to include the North and South Forks of the Koktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has-

- (1) declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) declined to classify non-navigable anadromous waters as habitat;
- (3) declined to classify much of the moose wintering areas as habitat; and
- (4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, The (Tribe) expects that the Department of Natural Resources will incorporate the other considerations of the (Tribe) in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvijack drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the Nondalton Tribal Council requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Nondalton Tribal Council supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Nondalton Tribal Council requests that the Department of Natural Resources join with the tribal councils in holding public meetings on both DNR's proposed changes and the Citizen's Alternative in the villages that sued DNR as soon as possible, and in other communities.

Adopted this 8th day of March, 2013.

Comment 134 of 497 - submitted on 02/11/2013 at 12:00 AM:

I, along with many thousands other people who live in Alaska and in other states, am extremely concerned that our voices are not being heard in regard to the Bristol Bay Area Plan □ Pebble Mine. The State of Alaska is not taking into account our concerns and opinions. Even worse, I am sure scientific facts are being ignored.

When will people such as yourselves recognize that we need to move forward in a whole new direction. The future of our planet and all living creatures who inhabit it demand this action.

Pebble Mine, if allowed to be built, would ultimately be a disaster beyond limits. BE PROACTIVE.

Sincerely

Comment 135 of 497 - submitted on 05/02/2013 at 09:27 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I visit Bristol Bay.

Comment 136 of 497 - submitted on 04/29/2013 at 12:00 AM:

Alaska has very little private and state-owned lands. Most of Alaska is Federally owned and already is some sort of protected status.

Therefore, to sustain our future viability as a resource-extraction dependent state, Alaska needs to identify areas of high potential value and balance development of these areas with other competing interests.

The 2005 BBAP struck just such an appropriate balance between various stakeholder interests. Proposed amendments beyond those agreed to in the settlement of Nondalton Tribal et al v. State of Alaska, are not necessary and are clearly obstructionist in their intent---not balanced as the Alaska Constitution requires.

Further revision of this document sets a dangerous precedent wherein valuable resources will be locked up.

I'm not for destroying salmon habitat, or rural subsistence lifestyles. But "closing the book" before we study what is possible will neither advance our science nor secure our collective futures.

Respectfully

Comment 137 of 497 - submitted on 05/03/2013 at 07:27 AM:

In my consideration, the State's 2005 Bristol Bay Area Plan and its proposed amendments best suit the people of Alaska and those who live and recreate in this area through the Citizen's Alternative. Alaskans, particularly those who live right in the Bristol Bay region, depend on this area for subsistence, but also for recreational fishing, and they require clean water from the rivers, lakes and other waterways that all flow into Bristol Bay. Without adequate protection from competing uses that could pollute these waters, such as industrial mining, Bristol Bay and its valuable fishery will be degraded. Please select the Citizen's Alternative.

Comment 138 of 497 - submitted on 05/01/2013 at 10:57 AM:

I am appalled at the very idea of allowing mining on such a large scale & the so-called "safe" dumping & storage of life killing by-products on such a pristine area of our state for the benefit of a foreign company. Pure insanity fueled by the promise of money!!

They are LIARS! I was lied to & tricked into signing a petition FOR pebble mine at the Palmer AK state fair last year. They do NOT care about Alaska or Alaskans. Anyone who thinks it is a good idea can not see past the dollar signs pebble is dangling for bait. Risking the health of our salmon fishery in that area is akin to the slaughter of buffalo to starve out the Indians, shameful, extremely shameful!

Stop the pebble mine madness!!!

R. Fellman

Comment 139 of 497 - submitted on 05/06/2013 at 12:00 AM:

I am a small business owner here in Anchorage as well as a Permit holder for the Bristol Bay Salmon Drift (permit # S03T 60935V). I am one of the few fisherman that is not opposed to the Pebble Mine as we still do not know how the mine will be developed. What I do believe in is that:

- Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use.
- Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.
- Banning certain activities in an area plan ignores constitutional mandates that include development and multiple use

Please do not change the playing field again.

Comment 140 of 497 - submitted on 05/04/2013 at 10:19 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I (work in, visit) Bristol Bay.

Comment 141 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 142 of 497 - submitted on 04/28/2013 at 01:18 PM:

I support the Citizens Alternative area plan for the Bristol Bay region.

The State's 2005 revised plan was seriously flawed and clearly weighted in favor of mining interests. The state's constitution charges its officers with responsible development of its natural resources. However, the DNR is choosing to ignore that some of Alaska's richest resources are its fisheries and the supporting natural habitat that sustains thousands of people locally, in addition to people throughout the country and even the world who depend on the region's rich seafood resources. The fishing and visitor industries in the area provide jobs and income to the region, and a fair and realistic value should be placed on them.

As an Alaskan citizen vitally concerned with the future health of our state, I call on you to employ the stewardship with which your office is charged. Please support the adoption of the Citizens Alternative Bristol Bay Area Plan, which allows for the coexistence of mining, subsistence and wildlife interests, for the good of the entire state.

Thank you.

Comment 143 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

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- Use voluntary cooperative planning
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 144 of 497 - submitted on 05/06/2013 at 12:00 AM:

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In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 145 of 497 - submitted on 05/07/2013 at 10:43 AM:

Clean land for the Native people, for hunting, & for being in pure nature is the most important thing we can do. It is our only choice. Keep Bristol Bay wild & clean.

Comment 146 of 497 - submitted on 05/01/2013 at 02:54 PM:

My son is a resident of Alaska. I am not. However, I do visit your state every other year, and I strongly protest the 2012 Bristol Bay Area Plan. You must look at the Citizen's Bristol Bay Plan. You must plan for Subsistence hunting and fishing.

No one who cares about the lives of our children, grandchildren, and all the future generations wants the salmon streams polluted or the habitats of the bear, moose and caribou destroyed. How could you dare completely change the study done in 1984? We don't want the Pebble Mine. We don't want any land used by wildlife to be designated for exploration for "Mineral Rights."

You call your state "The Last Frontier". You should be proud of that, and keep Alaska wild and beautiful for we "tourists" who so love to visit and see all the natural scenery and wildlife. Haven't you paid attention to all the desecration and extinctions done in the lower 48? You need to be better than this.

Comment 147 of 497 - submitted on 05/05/2013 at 12:00 AM:

As an Alaskan resident, and 36 year salmon harvester in Bristol Bay, I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.

- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Sincerely

Comment 148 of 497 - submitted on 05/05/2013 at 07:29 AM:

As an Alaskan resident, and 32 year salmon harvester in Bristol Bay, I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

Increase habitat classifications for wildlife and fish.

Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.

Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.

Use voluntary cooperative planning.

Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

Create a Bristol Bay Advisory Board made up of local resident.

Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).

Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.

Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Comment 149 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years

working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 150 of 497 - submitted on 05/07/2013 at 01:21 PM:

I am a life long Bristol Bay Resident and have been hunting fishing and providing for my family in this land On this land and on the waters of this land and in the waters of this land. we started at a young age learning to provide going out with our parents, aunts, uncles, cousin, grandparents to provide for the coming winter we do this by picking berry's, hunting, trapping, fishing these are all things that we do to survive. As early as 10 years old my cousins and I were able to skin a caribou, moose and butcher them by ourselves as well as traveling vast distances going up the Mulchatna River to what we call bull sh!t Ridge which is above marabou landing. where we pick berry and wait for caribou to come across the hills from the Illiamna lake side we always had luck up there. using our patients that was taught to us as kids growing up waiting for the animals to roam across the tundra and provide to us. we never have to bring drinking water because we can drink right out of the streams the crisp cold water that provides the life of the tundra and the people that use it. we go up the Kuktuli River to the hills and pick vast amounts of low bush cranberries and blue berries and keep our eyes on the ever rolling hills for a chance to catch a moose or caribou and even bear. We don't bring much food because we know that we can catch fish and eat berries make tea from the tundra tea that grows out there. when we catch caribou we eat the meat and organs. when the migratory birds come over the hills we hunt them and when they lay the eggs we pick those to. these animals don't all stay close to the river they come they go and as they roam they are in there habitat. moving from place to place to find there sustenance just as you go to the grocery store and get your food they aren't all in one place they are spread out. you might order food online just as in your habitat the animals move all around to find food in there habitat. People look for sales to get the most for there buck the animals look for abundant amounts of food to provide for the

family too. the habitat is all over the the tundra where the animal roam and feed. not just close to the river but all over this land is there habitat and they deserve it to be so they can continue to provide for us the people of the land.

Thank you for reading my comment and letting me voice my concern for the land water and habitat.

Comment 151 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 152 of 497 - submitted on 05/05/2013 at 12:00 AM:

I am writing to support the citizens' alternative that recognizes more land as being important habitat. I know there are many acres, but we must not be careless. I have watched subsistence and enjoyed the harvest: the animals and plants people benefit from are part on intricate ecosystems that deserve our respect.

Comment 153 of 497 - submitted on 04/27/2013 at 08:53 PM:

I would encourage the Department of Natural Resources to consider the Citizens Alternative Bristol Bay Area Plan that will ensure that the region will be valued and managed correctly by carefully assessing and prioritizing Bristol Bay's sustainable resources.

Comment 154 of 497 - submitted on 04/16/2013 at 08:27 AM:

I have concerns over DNR's Bristol Bay Area Plan.

There seems to be a steady movement away from protecting fish and game while I would like to see an increase in the classifications for fish and wildlife habitat. I think mining poses a potential threat to the salmon nurseries that the many rivers and streams serve as. If some one or some organization wants to use water, they should have to prove fish will not be affected. For the health and continued well-being of our ecosystem which supports both subsistence and commercial fisheries and the taking of game, I want a plan that has "do no harm" as a guiding principle.

I support Citizens' Alternative Bristol Bay Area Plan.

Comment 155 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Create a Bristol Bay Advisory Board made up of local residents
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 156 of 497 - submitted on 05/02/2013 at 08:47 PM:

I support the Citizens Alternative Bristol Bay Area Plan

Comment 157 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 158 of 497 - submitted on 05/01/2013 at 05:14 PM:

Please protect the natural resources and renewable resources of Bristol Bay for future generations. Please ban development and mining in the last major wild salmon habitat on the Pacific coast. I urge you to adopt the Citizen's alternative and plan and support responsible sustainable practices in this area. The Bristol Bay area is critical habitat for many species but most importantly salmon. King salmon populations on the Pacific coast have diminished everywhere except this stronghold. The Kenai River showed the poorest return yet last summer and it had a grave effect on the economy and communities of that area. I do not want the same thing to happen in Bristol Bay. Not one gold mine on planet earth has ever not polluted the area it developed for mineral extraction. Please do everything in your power to prevent the demise of this region and do not permit mineral development.

Comment 159 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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Sincerely

Comment 160 of 497 - submitted on 03/26/2013 at 12:00 AM:

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- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 161 of 497 - submitted on 05/02/2013 at 12:00 AM:

I write to assert that the 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments beyond those agreed to in the settlement of Nondalton Tribal et al v. State of Alaska, are unnecessary. Furthermore, the revisions set a dangerous precedent for future area plans.

Our state government is directed, by Article VIII, Section 1 of the Alaska Constitution, "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest."

Our lands are rich in resources, which create wealth and economy, supporting healthy people and communities. Alaska is not a massive park. Alaska is a land which has supported multiple-use resource development for generations.

Please stand firm and reject narrow proposals that seek to restrict access by our people to our lands and its resources.

Respectfully

Comment 162 of 497 - submitted on 04/27/2013 at 02:45 PM:

I live, worked and vote in AK

I do not fish in Bristol Bay, nor have I worked in the fishing industry but I respect Alaskans that do. I support the Citizens Alternative Bristol Bay Area Plan as the more constructive choice to protect and support Alaskans work, culture and future generations

Gordon Glaser

Comment 163 of 497 - submitted on 05/03/2013 at 12:00 AM:

DNR's proposed revisions to the 2005 Bristol Bay Area Plan adequately protect wild game, salmon, subsistence, sport fishing and other public uses and are in concert with Article VIII, Section 1 of the Alaska Constitution. Article VIII mandates multiple-use of the State's lands and resources.

Single use land classification as advocated by the certain entities is not only unconstitutional but is an insult to intelligent land management.

I urge you to reject those narrowly focused alternatives that are being proposed by certain special interest groups that seek to deny Alaskan's full access to and use of our lands.

Sincerely

Comment 164 of 497 - submitted on 04/27/2013 at 02:21 PM:

I support the Citizens Alternative Bristol Bay Area Plan, which will ensure appropriate management and protection of valuable natural resources unique to the region and Alaska. This is a core mission for our state government and the Bristol Bay management plan should reflect those Alaskan values.

Sincerely,

Cathy Gleason

Comment 165 of 497 - submitted on 05/06/2013 at 02:36 PM:

Re: Public Review, Revisions to Bristol Bay Reclassification/planning document

I am a retired biologist who has worked extensively in the Bristol Bay drainage area. I have reviewed this document and wish to advise that 'Navigable waters' have nothing to do with salmon habitat. It is unnecessary to use navigability as part of criteria for anadromous fish habitat. Please move ahead as soon as possible, with a more comprehensive classification of lands for WATERSHED PROTECTION!!

thank you

Valanne Glooschenko, M.Sc.

Anchorage, AK 99504

Comment 166 of 497 - submitted on 05/06/2013 at 12:00 AM:

DNR has a constitutional obligation to manage state-owned lands for the "maximum public benefit" based on the directive in Article VIII Section 1 on the Alaska Constitution: "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." Sole designation of large sections of the state for wildlife or recreation is contrary to constitutional mandates. Banning certain activities in an area plan ignores constitutional mandates that include development and multiple use.

Multiple uses should include mining (exploration, leasing and development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.

Alaska contains known deposits of Rare Earth Elements (REE). Many of these REEs are imported to the United States, often from countries with lesser environmental regulations. According to the Mineral Commodities Summaries 2012 report by the U.S. Geological Survey, the U.S. depended on imports of 50-100% of needs for 43 minerals in 2011, some of which are found in Alaska. Keeping areas open to mineral extraction in Alaska not only provides the opportunity for future responsible resource development, it may also improve national security, and provide economic benefits to the region, as well as improve or add infrastructure and access to areas for multiple use □ example is cheaper energy costs.

The area included in the BBAP should be further evaluate for mineral potential before restrictive land designations are implemented. Sufficient mapping and geological information should be acquired, and until then, the area should be left open to all uses.

Sincerely

Comment 167 of 497 - submitted on 05/06/2013 at 12:00 AM:

My name is Courtenay Gomez; I was raised in Dillingham and that is where my husband and I raise our modern day "yours, mine & ours" family of four children, ages 15, 11, 5 and 2. You had the privilege of hearing public testimony from my husband's daughter, Cate Gomez (11) at the April 19th hearing in Dillingham.

We met in Dillingham through my work as the Director of Natural Resources for the Bristol Bay Native Association however; this is my personal email address and this correspondence serves as my personal public testimony in regards to the Bristol Bay Area Plan revisions and is not affiliated with my employer in anyway.

I support the habitat classifications outlined in the 1984 Bristol Bay Area Plan and did not appreciate that the writers of the 2005 plan did not follow established protocol by using the original plan as the foundation of the new plan.

I serve as a Chief of the Curyung Tribal Council and am therefore part of the plaintiff group that filed the lawsuit that brings us to where we are today.

I support the Citizen's Alternative BBAP and am requesting DNR to adopt all of the suggestions made forth in that document.

I also urge DNR to look to your colleagues at ADFG as a prime example of successful public involvement in natural resource management. ADFG's Board Support staff as well as the local advisory committee process should be used as a resource and also as a public participation model for DNR decision making. The local advisory committees are established groups of local people who are intimately involved in the management of Alaska's resources and work side-by-side with State staff regularly. For DNR to not communicate with this local State group when changing State land classifications in local areas baffles me. These groups are setup to help ADFG and the Board(s) of Fish and Game to make

more informed decisions regarding State management of local resources; DNR decisions would be much more informed and effective if they worked with the local ACs.

Thank you

Comment 168 of 497 - submitted on 05/05/2013 at 09:24 AM:

I am in full support of the Citizens Alternative. I object to re-doing the Bristol Bay plan.

Comment 169 of 497 - submitted on 05/07/2013 at 11:20 PM:

I am a life-long Alaskan resident raised on salmon and clean water. Don't throw away some of the last pure land on Earth. We are running out of time. Alaska is the future. The future is conservation & land-based jobs that are sustainable. The modern mining industry is not. We will show the world how it can heal itself. Alaska has the opportunity to lead humanity, like the bright northern star, by keeping this place pure and wild.

Comment 170 of 497 - submitted on 05/07/2013 at 11:24 PM:

NO PEBBLE MINE. KEEP BRISTOL BAY PURE AND WILD.

Comment 171 of 497 - submitted on 05/07/2013 at 10:35 AM:

Emergency on Planet Earth! Every single living system in our biosphere is in decline! The scientific data clearly illustrate the foolishness, wickedness, & corruption motivating this greedy idea. The value of our wild, robust, & intact watershed will be an infinitely more valuable resource than the single-use, pump & dump philosophy of industrial miners.

Please stop the Pebble Mine project proposal so I stop having anxiety. Please help save the planet. Please help us be better humans. Please help us live our lifestyle simply with salmon & berries.

PLEASE KEEP ALASKA WILD & PURE.

Comment 172 of 497 - submitted on 05/02/2013 at 12:00 AM:

Thank you for the opportunity to comment on the Determination of Reclassification and Plan Amendment- 2005 Bristol Bay Area Plan. While these comments apply to the Bristol Bay Area Plan Amendment as a whole, they specifically address the proposed land use designations in Region 7, with the potential to directly affect resources in Lake Clark National Park and Preserve.

1) The Chulitna river watershed is not recognized in this plan. Two large Settlement designation areas in the proposed plan would directly and negatively affect this watershed. The watershed and entirety of Region 7 containing other drainages feeding into Lake Clark should be designated Fish and Wildlife Habitat. The Settlement area designations should be removed from the Chulitna River watershed. The proposed land use classification in Region 7 cannot satisfactorily protect sensitive habitats.

The Chulitna River is the second largest tributary to Lake Clark and is an extremely important wildlife habitat area and subsistence area for the present day inland Dena'ina. In the early twentieth century the subsistence "bread basket" of the Lake Clark Dena'ina shifted from the Kijik-Lake Clark to an area nearer Nondalton, the Chulitna River-Sixmile Lake district. Subsistence remains vital to the community. A survey in 2005 found a population of 164 residents in Nondalton of whom 90% (147 residents) were Alaska Native (ADF&G 2004). The total harvest for all subsistence resources during 2004 for the community of Nondalton was 58,686 pounds usable weight, or 358 pounds per person. Fish constituted the largest portion of the harvest with 41,566 pounds (71 %), or 253 pounds per person. Other important resources for the Nondalton Dena'ina are moose, small land mammals, migratory waterfowl, ptarmigan, grouse, plants and berries. Sixmile Lake and the Chulitna River watershed are essential hunting, fishing and gathering grounds throughout the year for the Nondalton people.

In 2009, LACL began a partnership with the Nondalton Tribal Council and other interested parties to initiate an Integrated Resource Management Planning (IRMP) effort (BIA-funded) for the Chulitna River -Sixmile Lake watershed in tandem with a cultural landscape/traditional use study (NPS-funded). Over the past four years, we have collected a large amount of data documenting the subsistence and heritage resources within the Chulitna watershed. These data compliment the State's own subsistence studies (which the plan does not seem to have taken into account) and an earlier comprehensive ethnographic study by NPS, Nuvendaltn. Quht'ana the People of Nondalton by L. Ellanna and A. Balluta. The subsistence areas mapped by that study for show the importance of Region 7 to subsistence for the past 100 years. The maps are included here to illustrate the year-around importance of Region 7 to wildlife habitat and subsistence. Our current studies show that the significance of the watershed for wildlife habitat and subsistence continues today.

2) The State's large body of subsistence data collected over the past three decades appears not to have been used to inform the plan nor used to identify sensitive habitats, spawning and rearing areas, waterfowl areas, etc. The proposed Plan Amendment is not in keeping with the planning requirement to give priority to "physical economic, and social factors affecting the area" or to "rely, to the extent it is available, on the inventory of the state land, its resources, and other values." The nearly complete absence of Heritage Sites in the entire BBAP area (see BBAP Amendment Map 1), is evidence of the dismissal of these datasets from the planning effort. The Bristol Bay area is one of the richest concentrations of significant cultural heritage sites in the state. These sites and districts, many of which are listed on the National Register of Historic Places, date from 10,000 years ago to the 20th century, attesting to millennia of sustainable management and use of the land and resources; an impressive record that the BBAP amendment both disrespects and disregards.

3) All streams affected by Mineral Closing Order 393 were found to be appropriate for classification to Wildlife Habitat and should have a Habitat designation along the riparian zone, as with the Mulchatna River.

Again, thank you for the opportunity to comment. Please feel free to contact me at the address above, by email at Margaret_goodro@nps.gov or by phone 907/644-3627 if you have any questions.

Sincerely

6 maps attached.

Comment 173 of 497 - submitted on 05/02/2013 at 12:00 AM:

As an Alaskan resident I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources

or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in

the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Sincerely

Comment 174 of 497 - submitted on 04/28/2013 at 08:32 PM:

I support the Citizens Alternative because I wish to protect the Bristol Bay Watershed. Please do all you can to correctly manage this area's sustainable resources.

Comment 175 of 497 - submitted on 05/03/2013 at 12:00 AM:

I urge DNR to continue using the original 2005 version of the Bristol Bay Area Plan

The original plan provides flexibility for many uses including recreational sports hunting and fishing, subsistence harvesting by local residents, community planning alternatives, minerals exploration and development and other commercial uses. Considering the size of the area and the diverse needs that need to be addressed now and in the future it is imperative to maintain this flexibility.

The 2005 plan provides the DNR and other State agencies continued management authority over land and water uses as development progresses. Protection these resources does not require the sweeping planning restrictions proposed by some local and outside groups to the detriment of the planning process and resultant potential economic hardship to the area.

Most of the area encompassed by the plan is presently remote and unsettled. To contemplate tight land use restrictions at this time would not follow good planning precepts nor conform to the State's, DNR's, mission of providing for future land uses and economic growth. The primary purpose of the Statehood land entitlement was to provide a base for Alaska's economic growth. This growth was never intended to be a singular approach to land use but to include a myriad of economic benefits to the citizenry through development of fishery, timber, tourism, community expansion, and minerals resources.

The State's DNR employs professional planners operating within statutory guidelines to research and develop management plans for state land that are in the best interest of the state and citizens as a whole. This process has been successfully carried on since Statehood. To deviate from this at the urging or threats from a few individuals and outside groups is not in the best interest of the State.

The 2005 land classification plan applied to most of the lands in the area provides for environmental protection through a robust state and federal permitting system including reviews by Fish and Game, ADEC, DNR and a host of federal agencies. Thus proposed uses of any nature are subject to detailed scrutiny whether for mining, fisheries development, community expansion or other purposes. This check and balance system is unavoidable and insures sound development and protection of the environment.

Recent demographic studies in the Bristol Bay area indicate that there is a rather dramatic shrinking of the population. It appears that this is due at least in part to a paucity of jobs or careers particularly for the younger generation. In some cases this will result in threatened school closures when the state's minimum class sizes cannot be met. If we want to reverse this trend it will be necessary to provide longer term careers particularly for the younger generation. This means looking for ways to expand work opportunities through mineral resource development, et al. Creating roadblocks to development at this juncture would be hard on the local population.

I commend DNR for their continued planning and management activities for Bristol Bay area and trust future work will continue to address broad based uses that will benefit the area and entire state.

Thank you for the opportunity to comment on this issue which is so important to the continued progress of our state.

Sincerely

Comment 176 of 497 - submitted on 05/01/2013 at 03:50 PM:

As a 30+ year Alaska fisherman and (former) Alaska resident I strongly urge full consideration of the citizens alternative to the Bristol Bay Area Plan. The 2005 Plan is unsuitable and does not serve the long term interests of the citizens of Alaska, or those of us who work in Bristol Bay. Protect what we have been given.

Comment 177 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

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Comment 183 of 497 - submitted on 04/01/2013 at 12:00 AM:

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In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 184 of 497 - submitted on 04/30/2013 at 09:41 AM:

Dear Alaska DNR,

I am writing to express my strong support for revision of the Bristol Bay Area Plan (BBAP), restoring the highest priorities for preservation of the complex habitat and wildlife which so deeply defines our state's heritage and culture. Please forgive the rough edit, but I want to get my comments to you before the deadline.

We know so much more now about wildlife habitat and the complex and critical elements needed to keep our wild lands healthy. But these systems are also delicate. We should be informing ourselves and be guided by the what we know about biology, relying too on those Alaskans who know the cycles of life along Bristol Bay streams from years of observation. At a time when global fish stocks are declining, our resources remain strong and sustainable. We also know now why our salmon stocks are becoming more valuable. Our salmon, rich in Omega-3 fatty acids, are proving the cornerstone of reducing cardiovascular diseases, which we now understand are significantly dietary diseases. Our long-term health, as a state and possibly as individuals depends on protecting the complex biosystems which form our rich, productive habitat and support life for so many Alaskans in a balanced, sustainable fashion. My interest, hunting and the pursuit of wild trout, are recreational, but have become the source of my outdoor passions. What I read tells me caution is warranted when tampering with the perfection Nature has woven in much of Alaska, but Bristol Bay in particular. Trout eggs are sensitive to the dust generated from installation of a nearby road, which reduces survival of fry. And so goes the web of life already perfected, but needing protection if Alaskans are to maintain our rich traditions and health. Clean, fresh water. It's not complicated.

What is the track record of mines? Perhaps one day, mining technology will improve outcomes, but techniques haven't yet proven themselves and Alaska is not the place to experiment. We also know much more about the long history of mining, including fish kills (Summitville, CO), and other accidents (Bingham Canyon Mine, April 2013). If there is an unforeseen mining catastrophe in the Bristol Bay region, what does history predict might follow? What about scenarios not considered □ what happens to the dust from 10.8 billion tons of toxic debris? What do mining companies do when potential losses exceed their assets? All too often, declare bankruptcy and vacate the mine, leaving state and federal governments holding the bag. Here's one quote from <http://www.abandonedmines.gov/ep.html> under Extent of Problem:

"Abandoned mine lands (AMLs) present serious threats to human health and the environment. Addressing AML impacts is becoming increasingly important due to increased exposure to people and risks of accidents, injuries, and tort claims. There are estimates of as many as 500,000 abandoned mines in our nation". We have to draw the line somewhere.

Alaska needs strong leadership in revising BBAP to emphasize protection of our water and wildlife resources, which provide the rich life and markets our state is famous for. The many Alaskans represented in the recent public outcry against HR77, now ask you to lead the way to protecting our future with a stronger BBAP which preserves what Nelli Williams/Trout Unlimited recently described to me, "...that better matches what the people who live, work and play in Bristol Bay want.... in response to the egregious flaws in DNR's 2005 area plan. For example using marine criteria to exclude uplands from habitat classification, defining recreation in a way that does not include sport hunting and fishing, and using navigability as a criteria to designate anadromous streams as habitat".

Thank you for your time and consideration in this matter.

Dwight Gurley

Eagle River

Comment 185 of 497 - submitted on 05/02/2013 at 12:00 AM:

My family of fly fishermen feel strongly that Pebble Mine would permanently damage the rivers they enjoy fly fishing in Katmai.

Thank you for standing up to Corporate bribery and up for Native Alaskans as they steward the land, water, and air in which they have survived for thousands of years.

Naturally

Comment 186 of 497 - submitted on 05/01/2013 at 06:45 PM:

Please reconsider the mineral designation for the Bristol Bay area. To allow mining with large scale use of arsenic and other refining metals that are toxic to fish and wildlife in an area prone to earthquakes is foolish and short sighted. Please

save our resources for all Alaskans not an outside mining company who has a history of destroying the land then moving on.

Comment 187 of 497 - submitted on 05/05/2013 at 12:00 AM:

Thank you for the opportunity for The Nature Conservancy to provide input to the recently released Determination of Reclassification and Plan Amendment to the 2005 Bristol Bay Area Plan (BBAP). The mission of The Nature Conservancy is to conserve the lands and waters on which all life depends. We have operated an Alaska Chapter for 25 years, bringing a science-based, non-confrontational, and results oriented approach to conservation. Our Alaska Board of Trustees includes business, civic, and conservation leaders from around the state.

Over the past several years The Nature Conservancy has made considerable efforts to better understand salmon distribution and habitat use in the Bristol Bay region. Our recent efforts to improve mapping of freshwater habitats that support salmon have been designed to assist in decision-making regarding land use and development activities. Thus, we appreciate this opportunity to share conclusions from our current habitat modeling in the Nushagak and Kvichak watersheds.

Our comments are related to the methods used to identify anadromous habitats for designation as Wildlife Habitat. In the majority of lands included in the BBAP, criteria used to designate land as Wildlife Habitat included: (1) navigability; and (2) listing in the Anadromous Waters Catalog.

1) While navigability is a useful indicator of recreation and/or subsistence use, it is not related to the extent or quality of habitat for anadromous fish. This criteria eliminates 49% of cataloged anadromous waters from designation as Wildlife Habitat, and it is not clear that the navigable sub-set of anadromous waters are equally important for salmon productivity than many others.

2) The extent of the anadromous waters catalog is most likely a significant underrepresentation of water bodies actually used by salmon for spawning and rearing. Our preliminary estimates suggest that only 22% of streams containing anadromous fish within the planning boundaries in the Nushagak and Kvichak drainages are included in the Anadromous Waters Catalog. Of these potentially anadromous waters, only 31% are included within lands designated as Wildlife Habitat. This analysis suggests that a majority of the regions anadromous waters are currently excluded from the catalog and from the lands designated as Wildlife Habitat in the draft plan.

The significant under-representation of salmon habitat within lands designated Wildlife Habitat is inconsistent with the very high value of salmon production in this region to Alaska's communities and economy. We recommend that DNR revisit the anadromous fish habitat criteria that DNR uses to classify Wildlife Habitat using more biologically relevant methods; a more justifiable approach may be to assume that all water bodies support anadromous fish unless evidence to the contrary is available. We hope that the review, analysis, and data that we have provided here will assist DNR in improving these criteria.

Thank you again for the opportunity to provide input to the 2005 BBAP and 2012 amendment.

Sincerely

Comments on Anadromous Habitat Classification in the 2005 Bristol Bay Area Plan

Summary

This review has been prepared as a response to the public review draft of the Determination of Reclassification and Plan Amendment to the 2005 Bristol Bay Area Plan (BBAP; ADNR 2012), and serves to provide comments and a brief scientific analysis pertaining to the methods used to identify anadromous habitats for designation as Wildlife Habitat in the current BBAP. In the majority of lands included in the BBAP, criteria used to designate land as Wildlife Habitat included: (1) navigability; and (2) listing in the Anadromous Waters Catalog. In this review, we conclude that:

1) While navigability is a useful indicator of recreation and/or subsistence use, it is not related to the extent or quality of habitat for anadromous fish. This criteria eliminates 49% of cataloged anadromous waters from designation as Wildlife Habitat, and it is not clear that the navigable sub-set of anadromous waters are equally important for salmon productivity than many others.

2) The extent of the anadromous waters catalog is most likely a significant underrepresentation of water bodies actually used by salmon for spawning and rearing. Our preliminary estimates suggest that only 22% of streams containing anadromous fish within the planning boundaries in the Nushagak and Kvichak drainages may be included in the

Anadromous Waters Catalog. Of these potentially anadromous waters, only 31% are included within lands designated as Wildlife Habitat. This analysis suggests that a majority of the regions anadromous waters are currently excluded from the catalog and from the lands designated as Wildlife Habitat in the draft plan.

The significant under-representation of salmon habitat within lands designated Wildlife Habitat is inconsistent with the very high value of salmon production in this region to Alaska's communities and economy. We recommend that DNR revisit the anadromous fish habitat criteria that DNR uses to classify Wildlife Habitat using more biologically relevant methods; a more justifiable approach may be to assume that all water bodies support anadromous fish unless evidence to the contrary is available. We hope that the review, analysis, and data that we have provided here will assist DNR in improving these criteria.

Comments on Anadromous Habitat Criteria

In the 2005 BBAP (ADNR 2005), the Habitat designation was defined as "concentrated use area for fish and wildlife species during a sensitive life history stage where alteration of the habitat and/or human disturbance could result in a permanent loss of a population or sustained yield of the species." Criteria in the BBAP to identify areas to be designated as Wildlife Habitat include waters used for spawning and rearing of anadromous fishes. However, in most areas within the BBAP boundaries, fish habitat is only designated as Wildlife Habitat if it is listed in the Alaska Department of Fish and Game's (ADFG) Anadromous Waters Catalog (AWC) and is considered navigable by boat.

Although the BBAP has recognized that spawning and rearing areas for anadromous fish is an important determinant for Wildlife Habitat designation, methods for evaluating which anadromous waters are included in this designation do not seem to be based on relevant aspects of the biology or productivity of salmon populations. It is widely recognized that the extent of waters used for spawning and rearing by anadromous fish within the boundaries of the BBAP is more extensive than reflected in the AWC. We respectfully submit two specific comments intended to strengthen methods used to designate lands and waters as Wildlife Habitat, with the ultimate goal of sustaining long-term salmon production and associated economic, cultural and social values.

Our first critique is based on the use of Navigability as a criterion in designation of Wildlife Habitat. The state defines a water body as "navigable" if it is useable as a highway for the transportation of people or goods. While navigability is a useful indicator of recreation and/or subsistence use, it is not related to the extent or quality of habitat for anadromous fish. Furthermore, it excludes small, tributary streams and off-channel habitats that play a critical role in salmon population productivity.

Map inserted here.

Figure 1. Areas classified as Fish and Wildlife Habitat and/or Recreation do not reflect the full extent of Anadromous Water Catalog within the boundaries of the BBAP.

Small tributary streams and off-channel habitats have actually been shown to be critical to several species and life stages of Pacific salmon (*Oncorhynchus* spp.). Both Chinook salmon (*O. tshawytscha*) and coho salmon (*O. kisutch*) are known to rear in both shallow, narrow tributaries (e.g., ADFG 2012; Mossop & Bradford 2004; Murray & Rosenau 1989; Rosenfeld et al. 2000) and off-channel, backwater areas. Beaver ponds typically not navigable by watercraft are recognized as essential winter habitat for juvenile coho salmon (e.g., Bustard & Narver 1975; Marshall & Britton 1990; Murphy et al. 1989; Nickelson et al. 1992; Peterson 1982; Pollock et al. 2004; Reeves et al. 1989). Even adult spawning fish utilize these shallower and narrower channels. Sockeye salmon (*O. nerka*) can be seen spawning with their backs out of the water in small streams and springbrooks, and both pink salmon (*O. gorbuscha*) and Chinook salmon can be found in shallow areas, with nests at depths as shallow as 10-30cm of water in small tributaries (Groot & Margolis 1991). Coho salmon are generally found spawning in almost all coastal streams regardless of size or remoteness (Groot & Margolis 1991).

Our second critique reflects the inadequacy of the AWC to represent the true extent of anadromous waters in this region. The extent of documentation of anadromous waters in Alaska, especially in remote areas, is mostly a product of sampling effort, and is mostly limited to areas with the easiest access or near potential development projects. Salmon have high adaptability and are considered generalists; in terms of freshwater habitat, they can be found in a very wide range of habitats across their range, and thus it is difficult to accurately document their full extent. The Alaska Department of Fish and Game acknowledges that it is likely that less than 50% of all anadromous water bodies in the state have actually been cataloged (ADFG 2012). In a study of headwater streams in the Nushagak River drainage, researchers found that 7 out of

every 10 streams with less than a 10% gradient contained rearing salmon, suggesting that nearly all headwater areas will contain fish, despite the fact that these areas were previously undocumented in the AWC (Woody & O'Neal 2010).

Alternative methods for defining anadromous habitat

Because we have concluded that using navigability and the AWC to define anadromous habitat is lacking in some regards, we wish to provide an alternative method for defining anadromous habitat. We hope that this can be used to better define and apply the habitat designation within the BBAP. As an alternative method, we applied a physical habitat model to predict likely spawning and rearing habitat within the Nushagak and Kvichak drainages. We believe that this model more accurately represents spawning and rearing habitats within this area as it extends to habitats beyond those previously surveyed and does not include a navigability criteria.

In order to develop a physical habitat model, we reviewed existing literature on the habitat requirements and preferences for both spawning and rearing habitat of all five species of North American Pacific salmon. It was determined that coho salmon has the widest range of habitat preferences of any of the species. Because coho salmon had such a wide range of habitat preferences, it was determined that a physical habitat model modeling coho distribution would be the most appropriate for determining full extent of spawning and rearing habitat within our study area. It is not expected that sockeye salmon, pink salmon, Chinook salmon, nor chum salmon (*O. keta*) would be found outside of the areas predicted for coho salmon.

Coho salmon have been found in habitats as diverse as braided glacial rivers, large mainstem areas, floodplains, estuaries, and slow-moving off-channel habitats, even within the same watersheds; they have long been described as the "least particular" of all Pacific Salmon (Groot & Margolis 1991). Thus, in order to develop a physical habitat model for coho salmon, stream gradient and migration barriers were the only factor used to predict potential spawning and rearing areas. In order to identify barriers to upstream migration, two data sources were used. Included in the AWC is documentation of known physical barriers; for example, beaver dams, vertical falls, and man-made of certain proportions barriers require documentation. We intended to eliminate water bodies located upstream of documented barriers from the analysis; however, examination of the data source revealed that there are currently no documented barriers within the Nushagak and Kvichak drainages. In addition, stream reaches with gradients above 16% have been found to serve as migration barriers (USFS 2001); thus, we eliminated water bodies located upstream of stream reaches with gradients greater than 16%. It is unlikely that coho salmon will be found in streams with gradients exceeding 7% (Burnett et al. 2007); thus all water bodies with gradients exceeding 7% were also eliminated from the analysis.

Final results of potential anadromous streams are shown in Figure 2; they include all water bodies with a gradient of less than 7% and not upstream of a known or predicted barrier.

Map inserted here.

Figure 2. Potential anadromous habitat within the Nushagak and Kvichak drainages, as compared to the current AWC and areas designated as fish and wildlife habitat.

It is clear from figure 2 and from recent sampling of anadromous fish distribution, that the full extent of anadromous water bodies in the Nushagak and Kvichak drainages is likely much larger than that currently described by the AWC or by the BBAP Habitat classification. Table 1 estimates linear distance of potentially anadromous streams within each current land use designation. This analysis suggests that only 31% of all potentially anadromous water bodies are currently included within land designations of Wildlife Habitat.

Table 1. The length of anadromous streams currently cataloged, and those found to be potentially anadromous by our model, by BBAP unit designation categories. The majority of streams that we found to be potentially anadromous are currently designated as General Use, as opposed to Habitat.

Table inserted here.

Recommendations

Although TNC is not advocating for a specific methodology for assigning land use designations for given management units, it is clear that the current methods for defining the wildlife habitat designation in regard to anadromous spawning and rearing habitat is flawed in some regards. We recommend that anadromous fish habitat criteria used to designate Wildlife Habitat rely on a more biologically relevant approach with an explicit goal of maintaining diversity and productivity of regional salmon populations. We hope that the review, analysis, and data that we have provided here and in the appendix will be helpful in this process so that not only this amendment to the BBAP but also future land use

decision making can better reflect life history needs and population-scale considerations for conservation of Alaska's salmon resources.

References inserted here.

Appendix A: Anadromous Habitat By Management Unit

Table A1. Potential anadromous habitat, current extent of the Anadromous Waters Catalog, and current designation by management unit.

Table inserted here.

Comment 188 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Protect Bristol Bay for the culture, the traditions, and the fish!

Comment 189 of 497 - submitted on 05/06/2013 at 12:00 AM:

The Resource Development Council for Alaska, Inc. is writing to comment on the Alaska department of Natural Resources (DNR) Draft Bristol Bay Area Plan (BBAP).

RDC is a statewide, non-profit, membership-funded organization founded in 1975. The RDC membership is comprised of individuals and companies from Alaska's oil and gas, mining, timber, tourism, and fisheries industries, as well as Alaska Native corporations, local communities, organized labor, and industry support firms. RDC's purpose is to link these diverse interests together to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC believes the state's proposed revisions to the 2005 BBAP adequately protect wild game, salmon, subsistence, recreation, sport fishing, or other public uses of land, fish, and game.

DNR has a constitutional obligation to manage state-owned lands for the "maximum public benefit" based on the directive of Article VIII Section 1 of the Alaska Constitution: "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." Sole designation of large sections of the state for wildlife or recreation is contrary to constitutional mandates.

The BBAP will manage approximately 19 million acres of State land. Much of the lands in the BBAP are resource rich and designated for mining.

Alaska contains known deposits of Rare Earth Elements (REEs). Many of these REEs are imported to the United States, often from countries with lesser environmental regulations. According to the Mineral Commodities Summaries 2012 report of the U.S. Geological Survey, the U.S. depended on imports of 50-100% of its needs for 43 minerals in 2011, some of which are found in Alaska. Keeping areas open to mineral extraction in Alaska not only provides the opportunity for future responsible resource development, it may also improve national security.

The area included in the BBAP should be further evaluated for mineral potential before restrictive land designations are implemented. Sufficient mapping and geological information should be acquired, and until then, the area should be left open to all uses. Additionally, resource development in the area would provide economic benefits and bring new jobs to the region, as well as improved or added infrastructure and access to areas for multiple use.

Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.

Alaska already contains more than 150 million acres of conservation system units where most development activities are banned. Specifically, in Southwest Alaska there is already millions of acres of land closed to development activity, including national wildlife refuges, state parks, and other designations.

RDC discourages the DNR from creating a new classification specifically for subsistence, as subsistence activities are managed by the Department of Fish and Game. Subsistence activities are included in the regulatory definition of "Wildlife Habitat Land," so there is no need to add a separate category for "subsistence." Subsistence is a generally allowed use on state land, and area plans do not affect "generally allowed uses."

Furthermore, a new classification such as subsistence will likely prohibit metallic sulfide mines in the Nushagak and Kvichak drainages, and implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams, closing much of the area to resource development.

In its settlement (Nondalton Tribal Council et al. v. State of Alaska, 3DI-09-46CI) DNR agreed to make six changes to the Bristol Bay Area Plan. The original plan went through the normal process of public hearings and review, the changes should be limited to those agreed to in the case.

Many of the issues raised by the plaintiffs in that case concern the management approach and classification changes in the 2005 BBAP from the 1984 BBAP. Plaintiffs and other groups that oppose resource development, particularly mining exploration and development, claim the 2005 BBAP favors mining above all other uses and fails to adequately protect wildlife habitat and subsistence. RDC believes the 2005 BBAP and the 1984 BBAP isn't just in habitat designation, nearly all mineral designations in the region were changed as well. The refined detail of the 2005 area plan necessitated revised designations and is not evidence of any bias - just more detailed management.

Should further changes be made beyond those agreed to, RDC is concerned it will set a dangerous precedent. Using litigation to force further changes in an area plan sets a dangerous precedent to let groups opposing specific projects hold sway, especially over an area plan that impacts 19 million acres.

Thank you for the opportunity to submit comments.

Sincerely

Comment 190 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

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- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 193 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 194 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 195 of 497 - submitted on 05/03/2013 at 07:14 PM:

I live in the Bristol Bay area and run a family owned business there. Upon seeing the 2005 Bristol Bay Area Plan and the proposed amendments, I seriously think the State needs to have a more balanced Bristol Bay Area Plan and place more value on recreational fishing, hunting and subsistence activities. The waterways that provide these opportunities and support our livelihoods, as well as a very important part of Bristol Bay's economy, need to be protected. The Citizen's Alternative takes these considerations into account. I very much hope you will use the Citizen's Alternative to protect the citizens of Bristol Bay' interests.

Sincerely,

Rochelle Harrison

Comment 196 of 497 - submitted on 03/18/2013 at 12:00 AM:

A resolution supporting the Citizen's Alternative Bristol Bay Area Plan and requesting public meetings in Bristol Bay.

WHEREAS, the Alaska Independent Fishermen's Association (AIFMA) is an Alaskan non-profit corporation serving Bristol Bay commercial fishermen members; and

WHEREAS, AIFMA, acting as the duly elected governing body pursuant to AIFMA's bylaws, has the authority to establish relationships and enter into contracts; and

WHEREAS, Our tribes, sportsmen, and commercial fishermen have made every attempt to work with the State regarding our concerns. DNR did no consultation with Bristol Bay residents, tribes, local governments, commercial fishing groups, or others before drafting the proposed changes to the plan

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat

- (1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Koktuli River, the Upper Talarik River, and eight streams to south of Pebble block,
- (2) navigable anadromous waters in their entirety, including the South Fork of the Koktuli River to Frying Pan Lake;
- (3) moose calving and some wintering areas to include the North and South Forks of the Koktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has-

- (1) declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) declined to classify non-navigable anadromous waters as habitat;
- (3) declined to classify much of the moose wintering areas as habitat; and
- (4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, AIFMA expects that the Department of Natural Resources will incorporate the other considerations of AIFMA in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvichak drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that AIFMA requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that AIFMA supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that AIFMA requests that the Department of Natural Resources hold public meetings in the villages that sued DNR as soon as possible, and in other communities.

Adopted this 11 day of March, 2013.

Comment 197 of 497 - submitted on 05/03/2013 at 06:44 PM:

My Father showed me how to Fish & Hunt, showed me that the land and water can give us all we need in life. Keeping them clean is the most important thing we can do for our Health and all of those that we depend on for substance. It was easy as a Kid to realize that all living things need clean water, and a safe place to live, free of contaminants. When I was 7 in 1970 he took me to Alaska, to fish with him on a 32' commercial fishing boat in Bristol Bay. Salmon Summers I call them.

Those first few years I just got in the way. And most likely had him thinking about my safety, I got into everything as most kids do. I know now its because of me that he has so many gray hair's.

It didn't take long for me to know what I was too become. This will be 42 years of Commercial fishing in Bristol Bay, and never in my life have I once thought about doing something else. Bristol Bay and

Commercial Fishing has become part of me. every winter I look forward to summer when I can stretch my net out and harvest my fare share of the catch.

Life as a fishermen is not for everyone, most people try and fail, and half of the rest won't admit that it beats them every summer and still they come back to fish again.

I love Bristol Bay and the life it's given me and my family. the first thing I do every summer is go down to the river and put my hands in the cold fresh water and wash my face. some of my friends make fun of me, I try to explain to them, That this River has given me all I have in life. That every thing I have ever owned was once a Salmon. I owe My life to Her! They just say ya sure Dave. Its hard to explain something that took a lifetime to acquire.

I've been waiting all winter to wash my hands and face in this river I call home. I know its stupid too some and I have tried to convey to them what it means to me, But most just laugh.

I say to myself as I put my hands in the cold river "I've come back for you once more, I am yours, and you are mine, I will only take what I need from you and give you all that I can, I Thank you for supporting me and keeping me Safe. I know one day you might take me and keep me, for good thing never last forever. If this summer is my time I have no regrets I am yours"

And Every summer the first and the last fish I catch I let go. This started from the very first summer fishing with me Dad, he said "You're suppose to eat the first one not let it go" I really don't know why it was something I just did, Its something that goes back to my childhood my first trip on the river with my Dad, the smell and feel of cold salt water of Bristol Bay mixing with the river waters from far up in the mountains. the way his boats hull cut through the waves and salt spray hit my face. The smell of mud at low tide. the feel of slime and blood on my face after a long day or night fishing.

Now after a life of fishing I can sense when the Salmon are in, I can smell them, feel them, I know when its going to be a big day. The feeling is just as strong when the last salmon has swam by on its way to spawn and die. I know deep inside me I too am part of this cycle of life. Yes I am proud and honored to be part of something so magical, I can honestly say I have helped feed way over a million people in my life. All my life I have been, and for the rest of my life I will be, an Alaska Commercial Fishermen in Bristol Bay! But Now as times have changed my future and even more importantly my Son and Daughter's future are at stake I need YOUR HELP because Now its my turn to show my kids how to fish hunt and the importance of a clean life, but more importantly how to Live!

Not so long ago I had a conversation with a nice man that I was Guiding sports fishing, we were taking a break sitting down looking at a Big Brown Bear fishing for salmon in the stream. We were truly enjoying the moment. I told him this river and the land you see gives him all he needs in life.

he said

"wish it was that easy in real life for US!" Soon after he turned the conversation to his needs and the finer things in life. Listening to him talk about his big company and all the things he needed to do on a daily basis to keep it running smoothly. The troubles he was having with his employes telling me that it would all fall apart if it wasn't for his working

long hours almost every day. He told me about his big house, fancy cars, His two kids he wished he had more time for. The trophy wife that he could never seem to make enough money to satisfy her needs.

"Feels like I'm a slave sometimes but its all worth it when I can relax doing stuff like this once a year for a week or two"

Then he asked me what do you do for a living you must do more than this.

I told him I was self employed fishing commercially for Salmon Right here on this river! have been doing it my whole life, sometimes I take people such as yourself fishing but mainly I just fish Commercially for Salmon two to three months a year.

He was quick to point out, "That must be just your summer job" and asked me what I did in the winter. I told him "fishing gives me all I need and all I ever wanted from life and more, way more then you will ever have!

This made him somewhat mad, Not wanting to upset him any further I apologized for being so blunt.

Out of frustration he told me. "I was wasting my life just sitting around, when I should be working and doing more to make money".

I told him Fishing really has given me all I need.

He said "What if you just fished more or get another job fishing!"

I told him that I have in the past, but it takes a lot of time that I would rather be spending with my family.

I asked him what would I get from life, working as hard as you? he was quick to say

"You would be a rich man like me!".

And what would that get me, I said.

"You could sit around and enjoy your life doing what you want"

I just said

"what do you think I'm doing right now!"

For the next five minutes we just sat there with nothing to say, watching the Bear Eating his Salmon.

If you take any of my life story I to heart, please, Please, remember this, Bristol Bay is More than a Watershed It's a way of LIFE!

Sincerely

David Hart

Comment 198 of 497 - submitted on 05/01/2013 at 10:41 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan such as the Citizen's Alternative. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I work and visit Bristol Bay.

Comment 199 of 497 - submitted on 05/06/2013 at 02:19 PM:

Kachemak Bay Conservation Society (KBCS) strongly supports the Citizens Alternative Bristol Bay Area Plan (BBAP) for the following reasons:

1. The Citizens Alternative (CA) is consistent with the vision statement of the Bristol Bay Visioning Project and the history of state, federal, local and tribal efforts to balance conservation and development in the Bristol Bay drainages.
 2. The CA relies on science and better mapping to designate primary uses and improve public participation.
- Ø KBCS thinks it's essential to include GIS maps depicting essential and important habitat, and subsistence and sport hunting and fishing use areas, as reflected in data from ADF & G, DNR and other sources.
3. The Citizens Alternative improves area-wide management guidelines.

The Citizens' Alternative significantly revises the area-wide guidelines to ensure that habitat, recreation, and subsistence are protected. Some of the revisions are:

Ø an automatic instream flow protection for salmon

Ø use of the "precautionary principle" when making any land use decisions that may significantly impact salmon

Ø a presumption that all waters in the Bristol Bay region are anadromous

Ø prohibition of metallic sulfide mining in the Nushagak and Kvichak watersheds

Ø a new mineral closing order that would ban new mining claims on or along salmon spawning streams potentially threatened by mining

Ø

4. KBCS thinks it is imperative to acknowledge and listen to the Bristol Bay residence

Ø Salmon and wild game represents the lifeblood of Bristol Bay communities. These resources are not just the food on our tables; they are fundamental to who we are as Yup'ik, Dena'ina, and Alutiq

Ø Bristol Bay residents created a vision for the Region which DNR has ignored. That vision seeks:

o To protect subsistence;

o To protect salmon, other fish, wildlife, waters and renewable resources;

o To protect and encourage a local economy based upon renewable resources; and

o To allow non-renewable resource development that doesn't threaten these other goals.

Ø DNR's 2005 Bristol Bay Area Plan and its amendments are contrary to that vision.

5. KBCS thinks subsistence resources should be the most important aspect of any BBAP

Ø The protection of, and access to, subsistence resources is of the utmost importance to local communities.

Ø The protection of fish and wildlife habitat and subsistence uses should be given priority in the Region, not mining

Ø DNR claims to protect subsistence resources through its habitat land classification and yet it removed the habitat classification on 94 percent of the land. That decision threatens our subsistence way of life.

Ø DNR refuses to implement a stand-alone subsistence classification and yet it recognizes a "minerals" classification. Without widespread habitat designations and without a subsistence classification there is no protection for subsistence resources. That is unacceptable and just reinforces our view that DNR is choosing mining over salmon.

Ø Very little has changed in the Bristol Bay region since the 1984 Bristol Bay Area Plan was developed. We still use the same areas to hunt and fish. There is no support for DNR's approach to eliminate the habitat classification as it did in the 2005 version of the Bristol Bay Area Plan and the amendments do not do enough to protect subsistence resources.

Ø Although DNR's amendments restored some habitat land classification, the amendments and DNR's overall approach does not go far enough and does little to protect the people of the region or their way of life

6. KBCS does not think DNR's amendments go far enough to protect fish and wildlife, and subsistence and recreational uses.

Ø DNR refused to restore the habitat classification for non-navigable portions of anadromous streams. Just because you can't float a boat on a stream doesn't mean that salmon don't use it. That is a ridiculous distinction to make. The entire reach of all anadromous streams in Bristol Bay should be protected.

Ø DNR refused to restore the habitat classification for moose wintering areas. Moose are an extremely important subsistence resource. The protection of moose wintering habitat is essential to their survival and the overall health of the population. It should be classified as habitat.

Ø DNR refused to restore the habitat classification for caribou calving or wintering habitat. Caribou are an extremely important subsistence resource. The protection of caribou calving and wintering habitat is essential to the survival and overall health of the population. It should be classified as habitat

Ø DNR refused to recognize and implement a "subsistence" classification and yet it recognizes a "minerals" classification that paves the way for mining. This is a slap in the face to those who depend on the subsistence way of life and the cultural connection that people of the region have with salmon and wild game.

7. KBCS supports the Citizens' Alternative because it does the following:

Ø Increases and restores the habitat protections for fish and wildlife;

Ø Prohibits metallic sulfide mining in the Nushagak and Kvichak watersheds;

Ø Incorporates new guidelines to protect subsistence in the Nushagak and Kvichak watersheds;

Ø Directs DNR to use the precautionary principle before making any decisions that could impact anadromous streams and vital salmon and wildlife habitat (i.e., if you don't know how a decision will impact fish and wildlife and their habitat, err on the side of caution);

Ø Proposes a new mineral closing order that would ban new mining claims on or along salmon streams that are threatened by mining;

Ø Establishes an automatic instream flow reservation for fish. Fish need water therefore fish should be given the priority for the water in streams, not mining companies

Ø Creates the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.

Sincerely,

Roberta Highland

Kachemak Bay Conservation Society

3734 Ben Walters Lane

Homer, AK 99603

907-235-8214

kbayconservation@gmail.com

www.kbayconservation.org

Comment 200 of 497 - submitted on 04/28/2013 at 12:55 PM:

My family and I, a 45-year resident of Alaska, support the Citizens Alternative Bristol Bay Area Plan because it ensures that the region will be valued and managed correctly by carefully assessing and prioritizing Bristol Bay's sustainable resources. Thank you.

Comment 201 of 497 - submitted on 04/30/2013 at 09:21 AM:

As a Alaska resident for over 17yrs, and a sport fisherman in Alaska for over 20yrs, I beleve it very important to protect Bristol Bay. Please return balance to Bristol Bay, and support the Citizen's Alternative.

Comment 202 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish

- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages

- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 203 of 497 - submitted on 04/16/2013 at 12:00 AM:

I CARE ABOUT THE FUTURE OF BRISTOL BAY'S FISH AND FAMILIES.

PLEASE, PROTECT THEM!

The past 45 years of protecting the salmon and their habitat has been a very good policy □ "Wild AK salmon" is known all over the world. Let's not change that and therefore destroy the last remaining "salmon culture" in the world. Do everything in your power to make sure the habitat is not affected.

Thanks

Comment 204 of 497 - submitted on 05/06/2013 at 03:32 PM:

May 1, 2013

Dear Mr. Phelps:

I am a long time resident of Bristol Bay writing to provide comment on the State of Alaska DNR's revisions to the 2005 Bristol Bay Area Plan (BBAP). The 1984 BBAP utilized an extensive public participation process to develop an Area Plan which represented fairness to all user groups, and also met the standards established by the Alaska Constitution. It served us well for 20 years. Uncalled for revisions to the BBAP, were made in 2005 in a manner that discouraged public discussion and participation in the planning process. The product of this process reprioritized 94% of the land area covered by the plan to extractive mineral development to the exclusion of all other beneficial users. The State Supreme Court threw out the 2005 BBAP on Constitutional grounds and remanded it to be redone. To comment on the current state version released in early 2013 requires having three plans on the table concurrently, an unwieldy process at best. The current (2013) version fails in numerous ways to provide adequate protection for the Bristol Bay region's valuable renewable resources, its people who use and rely on those resources, or the people of the State who own them. Commenting on specifics is difficult. Therefore, I will begin by formally supporting the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of communities and Bristol Bay-based business interests .

The people of Bristol Bay have recently spent 20 months doing the foundation work for a land use plan. The regional organizations and each of the communities of Bristol Bay did an exhaustive job on a visioning process focused on resource values looking into the future over the next twenty-five years. While the DNR □planners□ did not avail themselves of this wealth of information, the tribes, communities and resident fishermen of Bristol Bay did □ citing in

particular the local emphasis on the importance of subsistence, and the importance of a sustainable economy for the region grounded on renewable resource development.

The Citizen's Alternative recommends that DNR include a number of revisions to the current version of the 2013 Bristol Bay Area Plan:

" Consider the importance (social, cultural, economic, physical, emotional and spiritual) placed upon subsistence by local residents and school children: Increase habitat classifications for wildlife and fish. I recommend that DNR establish a distinct classification for subsistence, with its own criteria. My daughter age 18, says that subsistence not only puts top quality nutrition on our table, but is where she learned a reverence for life, community helping and sharing, family values about conservation and preservation, how to work together in groups and as a family, who can be relied upon to get out of bed at 3am and demonstrate a work ethic. This is how we teach the next generations our values, and spend quality time together.

" Recognize and incorporate the precautionary principle in implementing the land management plan. Adopted by the State Board of Fish, this principle states that if the consequences of a decision are not clear, the decision maker must err on the side of conservation. Therefore one must presume that all waters of Bristol Bay are necessary for salmon unless proven otherwise. It must be understood that nothing about fishing, habitat, or recreation threatens mining. Mining however because of its non-renewable nature, threatens all of the renewable beneficial uses.

" Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat. Reestablish the system used in the first BBAP that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

" Create a Bristol Bay Advisory Board made up of local residents, industry groups (fishing, mining, tourism, transportation, etc.), State agency representatives, and federal conservation unit representatives. The purpose of this advisory is, using voluntary cooperative planning, to provide for the preparation and implementation of a comprehensive and systematic plan cooperative management plan.

- (1) to conserve the fish and wildlife and other significant natural and cultural resources within the region;
- (2) to provide for the rational and orderly development of economic resources within the region in an environmentally sound manner.
- (3) the identification of the significant resources of the region;
- (4) the identification of areas within the region according to their significant resources and the present or potential uses within each such area
- (5) identify consistent purposes, goals, and implementation strategies whereby, consistent with the internal agency imperatives, government agencies will seek to promote sustainable renewable resource values important to the local community/ies..

" Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

" Because of their potential to create irreversible acid mine drainage, prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.

Once again, I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Sincerely,

Terry Hoeffler

PO Box 825

Dillingham, AK

99576

Comment 205 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 206 of 497 - submitted on 05/03/2013 at 11:52 AM:

No Pebble mine!!

Comment 207 of 497 - submitted on 05/04/2013 at 12:00 AM:

To Whom It May Concern:

At this time the State of Alaska Department of Natural Resources home page is no accessible to the public because your server is reportedly shut down.

This circumstance is prohibiting Alaskans from giving comment regarding the use of their natural resources in the Bristol Bay area.

I am submitting my comments to you in this email as a result of your failure to provide me with fair access to comment and to exercise my rights as an Alaskan, a shared owner of our state's resources.

I support the Citizen's Alternative Bristol Bay Area Plan that will ensure that the region and its resources will be sustained, valued and managed for the benefit of all Alaskan's for generations to come.

State government has grossly undervalued Bristol Bay's fish and wildlife habitat and the resource they offer to Alaskans.
The State government must represent the people of Alaska and re-do their original plan.

I support the Citizen's Alternative Bristol Bay Area Plan.

I await response to this message.

Respectfully

Comment 208 of 497 - submitted on 05/04/2013 at 12:00 AM:

To Whom It May Concern:

At this time the State of Alaska Department of Natural Resources home page is no accessible to the public because your server is reportedly shut down.

This circumstance is prohibiting Alaskans from giving comment regarding the use of their natural resources in the Bristol Bay area.

I am submitting my comments to you in this email as a result of your failure to provide me with fair access to comment and to exercise my rights as an Alaskan, a shared owner of our state's resources.

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State government has grossly undervalued Bristol Bay's fish and wildlife habitat and the resource they offer to Alaskans.

The State government must represent the people of Alaska and re-do their original plan.

I support the Citizen's Alternative Bristol Bay Area Plan.

I await response to this message.

Respectfully

Comment 209 of 497 - submitted on 05/04/2013 at 12:00 AM:

To Whom It May Concern:

At this time the State of Alaska Department of Natural Resources home page is no accessible to the public because your server is reportedly shut down.

This circumstance is prohibiting Alaskans from giving comment regarding the use of their natural resources in the Bristol Bay area.

I am submitting my comments to you in this email as a result of your failure to provide me with fair access to comment and to exercise my rights as an Alaskan, a shared owner of our state's resources.

I support the Citizen's Alternative Bristol Bay Area Plan that will ensure that the region and its resources will be sustained, valued and managed for the benefit of all Alaskan's for generations to come.

State government has grossly undervalued Bristol Bay's fish and wildlife habitat and the resource they offer to Alaskans.

The State government must represent the people of Alaska and re-do their original plan.

I support the Citizen's Alternative Bristol Bay Area Plan.

I await response to this message.

Respectfully

Comment 210 of 497 - submitted on 05/04/2013 at 12:00 AM:

To Whom It May Concern:

At this time the State of Alaska Department of Natural Resources home page is no accessible to the public because your server is reportedly shut down.

This circumstance is prohibiting Alaskans from giving comment regarding the use of their natural resources in the Bristol Bay area.

I am submitting my comments to you in this email as a result of your failure to provide me with fair access to comment and to exercise my rights as an Alaskan, a shared owner of our state's resources.

I support the Citizen's Alternative Bristol Bay Area Plan that will ensure that the region and its resources will be sustained, valued and managed for the benefit of all Alaskan's for generations to come.

State government has grossly undervalued Bristol Bay's fish and wildlife habitat and the resource they offer to Alaskans.

The State government must represent the people of Alaska and re-do their original plan.

I support the Citizen's Alternative Bristol Bay Area Plan.

I await response to this message.

Respectfully

Comment 211 of 497 - submitted on 04/28/2013 at 02:56 PM:

I strongly support the Citizen's Alternative Bristol Bay Area Plan to ensure that this incredible natural treasure is valued and managed appropriately.

Comment 212 of 497 - submitted on 05/06/2013 at 12:00 AM:

I am writing to comment on the State of Alaska Department of Natural Resources revision of its Bristol Bay 2005 Area Plan. The 2005 plan fails to adequately protect the resources in the Bristol Bay area from excessive or irresponsible commercial development. In order to see that the resources are adequately protected for the future use and benefit of Alaska citizens the previous 2013 plan should be seriously upgraded as recommended by the Citizen's Alternative Bristol Bay Area Plan. An ounce of prevention early could prevent a cure that could come all too late or not at all.

Sincerely

Comment 213 of 497 - submitted on 05/02/2013 at 09:11 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I have a home and business in Bristol Bay.

Thank you,

Eli Huffman

Nushagak Salmon Camp LLC.

Comment 214 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 215 of 497 - submitted on 05/05/2013 at 04:20 PM:

The Bristol Bay watershed is an irreplaceable area that has supported wildlife as well as humans for thousands of years. All of these values would be decimated by permitting the proposed mining operation in the region.

Comment 216 of 497 - submitted on 05/06/2013 at 01:11 PM:

I'm writing in full support of the Citizen's Alternative Bristol Bay Area Plan submitted to DNR by the plaintiff tribes and their allies.

Comment 217 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 218 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 219 of 497 - submitted on 05/01/2013 at 07:25 PM:

I do not want Pebble Mine to happen. No matter how safe their mining practices may be, at some point there will be an environmental problem and in such a remote and sensitive ecosystem, the damage will be irreparable. Are we willing to risk the Bristol Bay fishing future and the ecosystem of the area for one mine?

Comment 220 of 497 - submitted on 04/27/2013 at 03:55 PM:

I am in support of the Citizens Alternative Bristol Bay Area Plan.

Comment 221 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
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Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 222 of 497 - submitted on 04/30/2013 at 12:00 AM:

I am not of the area of the Pebble Mine, but I am an Alaska native as everyone knows we are the first people here in Alaska. We take pride in our land, air and water have always made sure to protect the resources to see a plan such as this at the head waters of one of the major streams that produces some of the finest salmon world wide is unheard of. There is no way that anyone can guarantee us that there would not be contamination into this river, that could cause this major river to stop producing all the salmon that many native and non natives alike depend for food and income. This river has been untouched for thousands of years lets keep it that way say NO to the Pebble mine keep Bristol Bay pristine for the generations to come

Comment 223 of 497 - submitted on 04/19/2013 at 12:00 AM:

Re: Public Comment on Bristol Bay Area Plan Revisions

As a forty-six year resident of Alaska, I'm writing to provide comment on the State of Alaska's DNR revisions to the 2005 Bristol Bay Area Plan.

The DNR enacted drastic changes in the existing BBAP in 2005, without due public input.

DNR's action reduced the area to a clearly inadequate, tiny portion of the area that had been designated in 1984 and seems to specifically accommodate the Pebble Mine Project.

Given the inevitability of water contamination and compromise of the fish stocks and other animal species if the Pebble Mine is approved, the BBAP of 2005 is contrary to common sense and public trust.

Under the mantle of corporate protection, once any area is contaminated, the corporation merely files for bankruptcy and dumps the problem on the public - us.

I urge you to void the BBAP of 2005, issue no permits or licenses under the provisions thereof and carefully revise the BBAP in accordance with Article 8 of the Alaska Constitution.

Sincerely

Comment 224 of 497 - submitted on 04/29/2013 at 11:35 AM:

DNR,

I believe that the only sensible plan for the Bristol Bay area is to protect the fish and wildlife first and foremost. Mining in this area can and probably will lead to a huge disaster that will devastate one of the last pristine areas in the world. I strongly support the Citizen's Alternative Bristol Bay Area Plan, which is a much improved approach to direct the usage of the Bristol Bay area resources.

Best regards,

Bill Jaidinger

Comment 225 of 497 - submitted on 05/01/2013 at 10:31 AM:

This is SO VERY IMPORTANT! We have a chance NOW to protect and do the right thing. I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I strongly recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I live in Alaska, work in Alaska, and in America.

Comment 226 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 227 of 497 - submitted on 05/05/2013 at 12:00 AM:

I urge you to not make additional changes to the 2005 Bristol Bay Area Plan. The plan currently has a good balance of uses listed and does not favor mining or any other use over another.

Based on the State Constitution the DNR (Department of Natural Resources) has an obligation "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." (Article VIII Section 1 of the Alaska Constitution)

Maximum use does not mean the DNR should set aside land for "Subsistence Use".

Regulating subsistence is outside of the DNR's purview, that job falls to the Board of Game. The DNR should consider how state lands can be used to benefit the largest number of Alaskan's. While sport fishing and subsistence hunting is important neither activity benefits the majority of Alaskans. Development of State lands on the other hand benefits ALL ALASKANS by improving the economy and generating revenue for the State.

Further development of land in the "Bristol Bay Region" would lead to increased infrastructure thus allowing for easier access to and use of State lands for activities such as "subsistence" and sport fishing. Designation of an area for mineral exploration doesn't prevent use of that land for subsistence. Thus mineral exploration and possible mining will actual enhance use of State lands for substance.

It is true the 2005 land management plan included more area designated for mineral exploration than the 1984 plan. This is in part due to the increasing need for "rare earth elements" and their discovery in Alaska.

Please do not allow special interest groups to scare or push you into changing a good plan. Do not allow such groups to restrict use of State Land to their narrow definition of beneficial use. Instead let the 2005 Bristol Bay Area plan stand, let the free and fair market decide if further mineral exploration is worth wile.

While market forces decide what level of economic interest there is in the BBA, all of the land remains available for Subsistence and other uses.

Respectfully

Comment 228 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 229 of 497 - submitted on 05/06/2013 at 12:00 AM:
RESOLUTION 2013-02

A resolution supporting the Citizen's Alternative Bristol Bay Area Plan.

WHEREAS, Portage Creek Village Council (PCVC) is the federally recognized Alaska Native tribe serving its tribal members and the community of Portge Creek; and

WHEREAS, (PCVC), acting as the duly elected governing body pursuant to the Constitution of (PCVC), has the authority to establish relationships and enter into contracts; and

WHEREAS, Our tribes, sportsmen, and commercial fishermen have made every attempt to work with the State regarding our concerns. DNR did no consultation with Bristol Bay residents, tribes, local governments, commercial fishing groups, or others before drafting the proposed changes to the plan

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat:

(1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Koktuli River, the Upper Talarik River, and eight streams to south of Pebble block,

- (2) navigable anadromous waters in their entirety, including the South Fork of the Koktuli River to Frying Pan Lake;
- (3) moose calving and some wintering areas to include the North and South Forks of the Koktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has:

- (1) declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) declined to classify non-navigable anadromous waters as habitat;
- (3) declined to classify much of the moose wintering areas as habitat; and
- (4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, The (PCVC) expects that the Department of Natural Resources will Incorporate the other considerations of the (PCVC) in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvichack drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the Portage Creek Village Council requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Portage Creek Village Council supports the Citizen's Alternative Draft Bristol Bay Area Plan;

Adopted this 6th day of May, 2013

Comment 230 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 231 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 232 of 497 - submitted on 01/11/2013 at 10:48 AM:

As I look at the map of this area and read the proposed changes to the area plan I do not see a need the change any of the designations of the area habitat or water ways designations. As this would make it more restrictive to the already limited areas of use, that most Alaskans have access. There are those of us that do live a subsistence lifestyle that do not benefit from being shareholders in corporations that control most the other lands around the area. So being able to have full access to these areas are very important to all alaskans.

Comment 233 of 497 - submitted on 04/11/2013 at 03:16 PM:

I would like to comment on DNR plan for the bristol bay area. I feel that this area has been designated for mineral development for many year now. The public has had many years to express any disapproval of the proposed use for this land. So waiting until someone wants to develop it and create some kind of business oppurtunity on that land is not fair to the user groups that try to follow the DNR's area plans. I am speaking from my experience as a planning and zoning commisioner for the Bristol Bay Borough. what DNR has designated the land for was mining or more specifically mineral development. So it has been through a process of what it should be used for, now if developers were wanting to do something different. Then there should be public comment and a variance process.

Comment 234 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish

- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages

- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining

- Use voluntary cooperative planning

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 235 of 497 - submitted on 04/17/2013 at 12:00 AM:

I CARE ABOUT THE FUTURE OF BRISTOL BAY'S FISH AND FAMILIES.

PLEASE, PROTECT THEM!

The salmon fishery of Bristol Bay is a planet treasure and source of livelihood to native Alaskans and their predecessors for several thousand years. Please fo all you are able to protect this resource.

Comment 236 of 497 - submitted on 05/05/2013 at 08:16 PM:

I am a 30 year resident of Alaska. I do NOT support the development of Pebble Mine in the Bristol Bay fisheries area.

I believe our fisheries are critical for Alaskans, they are critical to the Native people of the area, they are important for tourism. I believe those needs far outweigh the mineral wealth gained by an outside corporations, who will not invest in Alaska or provide sustainable development, as do our fisheries and tourism.

Furthermore the science is weighing in and its clear the development of the mine can have dramatic harmful effect on the environment, waters and fisheries.

I have not testified on this issue before but I can no longer remain silent.

Comment 237 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Use voluntary cooperative planning

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 238 of 497 - submitted on 03/18/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the AK-DNR failed to consult in a meaningful way with the people of Alaska during the 2005 B.B.A.P revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral closing order that would ban new mining claims on a or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents.
- Implement the precautionary principle when making and management decisions as it was originally adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.

Subsistence is the heartbeat of our culture in Bristol Bay and Bristol Bay Area plan needs to include subsistence as criteria or land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou

calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area plan into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 239 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 240 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 241 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 242 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 243 of 497 - submitted on 05/01/2013 at 01:23 PM:

We support the Citizens Alternative Plan and request reconsideration of a plan adopted by the Commissioner.

Comment 244 of 497 - submitted on 05/01/2013 at 10:11 AM:

Because the State has been ordered to redo the Bristol Bay Area Plan, I strongly support the State consider the Citizens Alternative Bristol Bay Area Plan. The Bristol Bay watershed is an immense treasure of this state and needs to be embraced as such. Do the right thing by listening to the people's wisdom and conserving the intact habitat of the Bristol Bay watershed. Again, I support the Citizens Alternative Bristol Bay Area Plan.

Comment 245 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 246 of 497 - submitted on 05/01/2013 at 10:41 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments.

My family of four owns two Bristol Bay Salmon Drift Gillnet permits and a 32 ft. aluminum gillnetter, the FV "Starship", and associated gear. We have a significant investment in this fishery, not to mention that we rely on it for our livelihood. We have consistently fished in the Bay since 1991.

I recommend the State consider a broader approach to their Bristol Bay Area Plan. The State's plan places too little emphasis on recreational, commercial, and subsistence fishing and protecting the rivers, streams and lakes that support this established multi-million dollar Bristol Bay's local economy. The Citizen's Alternative includes many, not all, reasons why my family works in Bristol Bay.

Moreover, we are shocked at the unilateral changes the State DNR made in 2005 to the 1984 BBAP. We had no idea of the depth and breadth of the unsound and unscientific changes made to promote the mining industry - aka Pebble. It is a lesson learned for us to review these plans and not assume the State is doing the right thing. Specifically, if permitting for this hugely destructive mine proceeds, along with the funding cuts Gov. Parnell will impose on the State permitting departments, the salmon fishing industry, e.g. commercial, recreational, and subsistence in Bristol Bay, will decline precipitously or cease to exist altogether.

Further, I am fully aware of the "One Voice" policy the State administration has imposed on ADFG and other resource Departments. This amounts to muzzling of long-time and well-respected biologists and violates NEPA. Please be put on notice: Purging information concerning habitat and species concerns, maps etc. from NEPA documents prevents the decisionmaker from taking a "hard look" at a proposed project's impacts. Removal of vital information regarding habitat, species viability and population sustainability of species violates the full disclosure requirements of NEPA. Further, such removal violates the Administrative Procedures Act by diminishing the content of NEPA documents and substituting information of lesser detail and quality than the information State agencies already had.

We do not believe you can "have it all" but are fully aware that the DNR/Parnell administration is spinning their BBAP to that effect. Saying so does not make it so.

Comment 247 of 497 - submitted on 03/21/2013 at 01:18 PM:

As a 69 year old resident of Bristol Bay I have been Commercial fishing since I was eight years old.... I have been hunting, fishing and trapping the Naknek, Egegik, Kvichak, Ugashik, and Nushagak Rivers since I started drift gill-netting when I bought my first gill-netter when I turned sixteen. The Naknek/Kvichak drainages have been my source of subsistence foods in the fall, winter and spring months since as long as I can remember. I have traveled the rivers by skiff in the fall hunting moose up to Naknek Lake and also up to Iliamna Lake. I traveled by snowmachine up to Naknek Lake and Iliamna Lake and up the Branch River in the winter to the winter grounds of the Caribou and Moose. These are vital areas for my subsistence hunting and could not survive in this area without them. The Caribou travel great distances depending on food source and snow coverage and it is necessary for subsistence hunters to travel where ever is necessary to provide food for families. It is very important that subsistence use be considered first as a land use priority.

Comment 248 of 497 - submitted on 04/30/2013 at 11:52 AM:

I have lived and worked in Naknek since 1975. My husband is a life-long resident of this area and has been commercial fishing for salmon since he was 8 years old. I have worked with him as a crewmember on our boat since 1978. Commercial and subsistence salmon fishing and moose and caribou is our main support enabling us to live a good life here.

I consider protection of salmon streams and habitat for moose and caribou as the most important management goals for the Nushagak and Kvichak watersheds. Renewable resources and clean water should always have precedence over non-renewable resources.

I believe we should use the precautionary principle in all our resource management decisions. Therefore, I am in support of the Citizen's Alternative to the Bristol Bay Area Plan. All waters in these watersheds should be treated as anadromous unless proven otherwise. ADF & G should have the final determination on this. Metallic sulfide mining and mining waste storage should be prohibited in these watersheds. Guidelines for protection of subsistence uses in these watersheds must be incorporated and habitats important for subsistence resources should be designated and protected from incompatible development.

I would also support returning to the original 1984 plan as suggested in the letter written by Dick Russell. I am in total agreement of the views expressed by Mr. Russell, especially when he states that state lands in the Bristol Bay watershed should be managed for fish and wildlife as the No. 1 priority and naturally pure waters as the No. 2 priority.

Thank you for considering my comments.

Comment 249 of 497 - submitted on 05/02/2013 at 12:00 AM:

As an Alaskan resident I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

I support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

Increase habitat classifications for wildlife and fish.

Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.

Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.

Use voluntary cooperative planning.

Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

Create a Bristol Bay Advisory Board made up of local resident.

Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).

Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.

Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 250 of 497 - submitted on 05/03/2013 at 10:54 AM:

I support the Citizen's Alternative Bristol Bay Area Plan.

Comment 251 of 497 - submitted on 04/27/2013 at 04:18 PM:

I would like to ask the commissioner to vote for the Citizens Alternative plan for Bristol Bay. I believe that it is important to protect the natural resources that are unique to Alaska. It is my belief that the scientific evidence supports the Citizens Alternative plan.

Cheryl Konter

Comment 252 of 497 - submitted on 05/01/2013 at 12:53 PM:

I am a retired wildlife biologist familiar with much of the area involved. I was appalled with the shallowness of your existing plan and sincerely hope that you will carefully and openly consider the revisions suggested by the various local national and international organizations who have deep concerns and offer valid and constructive alternatives. Thank you.

Comment 253 of 497 - submitted on 03/20/2013 at 06:55 PM:

Wetlands and waterbodies, such as the entire Nushagak and Kvichak Watersheds, should be off-limits to large-scale mining. Salmon and other sustainable resources should have priority over the development of finite resources.

Comment 254 of 497 - submitted on 05/04/2013 at 06:56 PM:

As an Alaskan and outdoor enthusiast, I would like to see more consideration to the broader spectrum. Please consider the citizen's plan, consider the future of the salmon and the lives of so many. These decisions should be made to protect what we have at all costs. Money can buy diamonds, but not wild salmon.

Thanks,

Kirsten Kremer

Comment 255 of 497 - submitted on 05/06/2013 at 04:24 PM:

I agree with and support the - Citizen's Alternative Bristol Bay Area Plan - submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay based business interests.

I am especially concerned and disappointed that the State of Alaska 2005 Bristol Bay Area Plan blatantly disregarded and changed the provisions of the 1984 plan that identified critical natural habitat for fish and wildlife. The appearance is that this happened without honest public notice and no attempt to solicit meaningful public input for these drastic changes, especially from the residents of Bristol Bay. The 2005 plan designated mining zones that trump critical fish and wildlife habitat which is especially troubling because metallic sulfide mining which will produce water, wind and noise pollution will affect a much larger area than the "zone" on the map. Metallic Sulfide mining activity and related construction will start the destruction of sensitive salmon spawning habitat and over time, or in one catastrophic event, the salmon for which Bristol Bay is known will be destroyed.

Also consider:

- 1 - The wind, which cannot be controlled, will blow sulfide dust from an open pit mine which will be dispersed and accumulate in the ecosystem and migrate to the watershed.
- 2 - If a mine requires a large holding dam to contain sulfuric acid producing rock material, what will the effects be on migratory birds or other wildlife coming in contact with the sulfuric acid water withheld by the dam?
- 3 - The destruction of the subsurface water table by mining activity - how can the long term effects of this be studied? and is it even possible to understand how important this might be to salmon habitat?

Thank you for the opportunity to comment on this important Plan.

Comment 256 of 497 - submitted on 02/25/2013 at 12:00 AM:

I realize that I do not live in AK, so my voice is perhaps of lesser importance. However, I do live on a creek in CA and have been extremely involved in trying to restore steelhead in it for the last 10 years, so far without success. I encourage you to change the current plan for this area to allow not only subsistence fishing for the native tribes, but also that ALL streams where salmon are or may be found are classified as supporting wildlife. As you would know as well as anyone, salmon spawn in streams that are NOT navigable by boat. If we're going to preserve the species, every stage of their life cycle must be protected.

Finally, I believe a policy that states "water cannot be taken out unless it can be proved that the withdrawal will not harm fish" should be adopted. The dam above my creek is holding back as much as 85% of the water. No wonder the steelhead are listed as an endangered species. Ten years of constant labor has failed to rectify this situation. You have an opportunity to prevent this kind of harm to the biggest industry AK has, commercial fishing, I urge you to act now to correct your current plan, rather than face the consequences of trying to repair the damage at a later time.

Comment 257 of 497 - submitted on 04/24/2013 at 12:00 AM:

Please accept my comment apposing any revision to the 2005 BBAP. I don't think I can say it better than the points submitted by the Pebble Partnership, please read below. I believe they are the only "good stewards" of the land operating out there. The lodges don't hire Alaskans and Trout Unlimited is an out of state entity. Please manage these lands for Alaskans. One of the most egregious points is the elimination of staking mining claims that impact salmon spawning streams in the entire state. That effectively eliminates all mining in the state of Alaska.

- DNR has a constitutional obligation to manage state-owned lands for the "maximum public benefit" based on the directive in Article VIII Section 1 of the Alaska Constitution: "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." Sole designation of large sections of the state for wildlife or recreation is contrary to constitutional mandates.

- DNR agreed to a settlement, which led to this plan revision, to make six changes to the Bristol Bay Area Plan. Considering that the original plan went through the normal process of public hearings and review, the changes should be limited to those agreed to in the case.

- Using litigation to force further changes in an area plan sets a dangerous precedent to let groups opposing specific projects hold sway, especially over an area plan that impacts 19 million acres.

- Area planning should be seen in the context of the broader permitting scheme □ this does not mean, for example, that because an area has been classified as "mineral" that a mine has been or will be permitted □ the classification identifies resource potential, not fully permitted activities.
- Banning certain activities in an area plan ignores constitutional mandates that include development and multiple use.
- The 2005 BBAP does not favor mining above other uses. More lands were classified as "mineral" lands in this version because of the additional inventories done between 1984 and 2005 that reflected this potential use. "Mineral" lands are still managed for multiple use, and in most cases are still available for recreation, hunting, fishing, and subsistence activities.
- Subsistence activities are included in the regulatory definition of "Wildlife Habitat Land," so there is no need to add a separate category for "subsistence." Additionally, subsistence is a generally allowed use on state land, and area plans do not affect "generally allowed uses."
- Managing "Subsistence" activities is outside of DNR's jurisdiction. DNR manages land, and the Board of Game decides what subsistence and hunting activities occur in that area.
- Alaska contains known deposits of Rare Earth Elements (REEs). Many of these REEs are imported to the United States, often from countries with lesser environmental regulations. According to the Mineral Commodities Summaries 2012 report by the U.S. Geological Survey, the U.S. depended on imports of 50-100% of needs for 43 minerals in 2011, some of which are found in Alaska. Keeping areas open to mineral extraction in Alaska not only provides the opportunity for future responsible resource development, it may also improve national security.
- Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use.
- Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.
- The area included in the BBAP should be further evaluated for mineral potential before restrictive land designations are implemented. Sufficient mapping and geological information should be acquired, and until then, the area should be left open to all uses.

Sincerely

Comment 258 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 259 of 497 - submitted on 05/01/2013 at 10:46 PM:

I am a subsistence user and oppose pebble mine and the downside of what that mine represents. If that mine is allowed to operate it will be the last of what we used to know as Bristol Bay and what it now represents. You can eat and feed people on fish, berries, moose, edible plants and berries but you would die trying to live on the minerals they are trying to extract from the region. IF THIS MINE GOES THROUGH IT WILL DESTROY WHAT WE HAVE THERE NOW FOREVER.

Comment 260 of 497 - submitted on 05/07/2013 at 12:29 PM:

I'm submitting this comment as a supplement to the public testimony I gave in April. I am a supporter of the Citizens Alternative plan, and urge the DNR to have the plan incorporate the Anadromous Streams Catalog and allow the catalog's future expansion to be included in the plan.

Comment 261 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 262 of 497 - submitted on 03/29/2013 at 12:00 AM:

Please accept and record the attached letter as my comment regarding the 2005 Bristol Bay Area Plan. Thank you.

It is MANDATORY that you talk to and more importantly listen to the people of this state. You have acted as if we do not exist, then ignored us, then attempted to pacify us. We are not going away and expect that our concerns based on our collective and generational knowledge be a vital planning tool in any and all plans the state considers.

You first made drastic changes to OUR Bristol Bay Area (Land Use) Plan by reclassifying most of the area as "general use" in 2005 from the mostly habitat classifications in the original plan of 1984 without public scoping, information sharing, or knowledge. Very little has changed in the Bristol Bay region since the 1984 Bristol Bay Area Plan was developed; we still use the same areas to hunt and fish. There is no support for DNR's approach to eliminate the habitat classification as it did in the 2005 version of the Bristol Bay Area Plan and the 2013 amendments do not do enough to protect subsistence resources: General Use does not provide accurate direction for land use planning and management in a Habitat area.

We asked you to rectify these "misclassifications" by listening and incorporating our knowledge and concerns into your revised plan, which you refused to do. This resulted in us having to file a lawsuit against you to even be heard. After the Alaska Supreme Court rejected DNR's efforts to block the courts from hearing the case, DNR agreed to amend the 2005 Bristol Bay Area Plan.

You seemed to see the error of your ways in some aspects of this plan and accepted some of our recommended changes to the plan, but fell way short by not including proper and real land use classifications and by using absurd considerations to make other land use classification decisions that do not provide for the protection of fish and wildlife habitat nor support subsistence, commercial, and recreational uses of fish and game.

We again asked you to reconsider and listen to the past and present "users" of these lands to formulate your revised plan and assure that we would be able to use this area in the same ways in the "future". Bristol Bay residents have created a vision for the Region which DNR has ignored. That vision seeks:

- To protect subsistence;
- To protect salmon, other fish, wildlife, waters and renewable resources;
- To protect and encourage a local economy based upon renewable resources; and
- To allow non-renewable resource development that doesn't threaten these other goals.

DNR's extensive use of the General Use designation, on the basis that not enough information exists to determine a priority use in the region, is a cop out and unjustified. Fish and wildlife and subsistence and recreational use data for the region was readily available in 2005 when DNR revised its plan. In fact, the Citizens' Alternative Bristol Bay Area Plan uses the State's data as the basis for all habitat classifications.

Upon our request for public input, you made hasty and immediate travel plans, with a 4 to 6 day notice to several communities within the affected area, said that you would provide information and a forum for which to make public comment in these visits, and did NEITHER. You came to us with very little information and no mechanism to document public comment.

As a tribal member of one of the Tribal Plaintiffs in the lawsuit brought against you, I understand that the State of Alaska does not recognize tribal sovereignty and does not have a government to government relationship with the tribes of Alaska. The State of Alaska, however, has the responsibility and regulations that require it to adhere to a public process. Tribes are both governments and the public and the State of Alaska cannot circumvent their responsibility to the public process because they do not recognize tribes as sovereign governments.

You ask that the State of Alaska be trusted with planning for and managing our own lands and resources without external interference or intervention by other governmental entities, yet you still operate in a vacuum, ignoring those most affected by these plans. This will not be tolerated.

I ask that you adopt the Citizen's Alternative Bristol Bay Area Plan, in whole, as your 2013 Revised Bristol Bay Area Plan. I also request a Cooperative Management Team be established to plan for land management in Bristol Bay as is also recommended in the Citizen's Alternative Bristol Bay Area Plan.

Comment 263 of 497 - submitted on 05/06/2013 at 04:06 PM:

Support the Citizens Alternative Bristol Bay Area Plan.

Comment 264 of 497 - submitted on 05/05/2013 at 11:54 AM:

As a commercial fisherman and outdoor enthusiast I am strongly against the proposed pebble mine. I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on commercial/recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I live and work in Alaska.

Comment 265 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving

grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 266 of 497 - submitted on 05/04/2013 at 10:24 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I visit Bristol Bay.

Comment 267 of 497 - submitted on 05/05/2013 at 07:48 PM:

May 5, 2013

RADS/DMLW

Alaska DNR

550 W. 7th Ave

Anchorage, AK 99501

Dnr.bbapamend@alaska.gov

Re.: Comments on the Bristol Bay Area Plan and amendments.

As a 30-year Alaska and Bristol Bay area resident I feel compelled to provide comments concerning the BBAP amendments. I would like to encourage the State to adopt the alternatives recommended in the Citizen's Alternative to the BBAP, restore many of the provisions from the 1985 BBAP and restore the public participation process as outline in State law (AS. 38.04.065) and DNR regulation.

I attended the BBAP community meeting in Dillingham to discuss the DNR's plan amendments as a result of the lawsuit. The stated purpose of the meeting was to clarify the purposes for the 2005 plan revision. Instead I became more confused. The stated purpose for revising the 1984 plan was a need to take a broad scale approach to land classification, yet the plan needed to refine management classification down to smaller areas(?). This statement is used to justify why broader habitat classifications and multi purpose management classification were replaced with mineral extraction as the sole purpose for much of the area affected by the plan.

In response to questions and lawsuit Causes regarding the non-designation of small, non-navigable anadromous stream sections as habitat, DNR states in the briefing materials from the meeting

a) "...that it is not practical to classify all streams as Habitat since it would not be possible to depict them on plan maps, which are the basis for our official records (status plats)".

This seems like a ludicrous explanation for not adequately designating and displaying lands and waters afforded Habitat protections. I would suggest using larger scale maps to adequately display the management classifications, especially if the maps are for the official record.

b) state owns the water associated with navigable streams, and area plans only affect state land;

The state does also own the land associated with the non-navigable streams as well.

c) it would preclude the conveyance of land to municipalities;

The state should not relinquish ownership or responsibility of lands and waters important as habitat for anadromous fish and other wildlife.

d) it is unnecessary since Chapter 2 management guidelines affect all anadromous streams and provide protection.

This discussion referred to the State's Title-16 protection authority, yet it was stated that DNR had no enforcement program. A case in point was the contamination that has already occurred in many areas (especially the Pebble prospect)

where test drilling associated with mining exploration has taken place and drilling mud has been deposited on surface vegetation.

I support the amendments in the Citizen's Alternative Bristol Bay Area Plan (CABBAP) that was developed by BB area tribes, commercial and sport fisherman, and business interest. I especially support:

" Restore protection for fish and wildlife Habitat; Subsistence Use; and Recreational Use. Nearly the entire area addressed in the plan is important for one or more of these Use categories. The plan should include these as the priority management designation.

" Restore Habitat classification to the majority of the BB planning area because the entire area is important habitat for fish and wildlife. Other uses should be secondary to habitat protection. Changing land use designations over time leads to the destruction of habitat. You only need to review man's history from the Atlantic Ocean, California, Pacific Northwest and Canada where development has been given priority over habitat protection. Atlantic and Pacific salmon runs have been severely reduced or extirpated from these areas. Alaska should learn from the mistakes others have made, and protect our renewable resources that the State holds in trust for the use of the people.

" Designate all anadromous waters as habitat including non-navigable waters. All waters are important. Even if fish are not present during the entire year these waters are the sources for the habitat downstream. Just because the State has not looked at all this habitat doesn't mean that it is not important. Until the effort is put into surveying all the waters in the BB area, the State should err on the side of caution and consider all waters as important habitat until proven otherwise. Having spent many hours in the doing fisheries field research I can attest that it is rare to not find adult and juvenile salmon or anadromous Dolly Varden in most non-navigable waters during some time of the year.

" Reestablish the system from the 1984 BBAP that automatically reserves water levels for fish and require any proposed use of water extraction to prove to have no harm to fish before it can be permitted.

" Areas identified as calving, overwintering, migration, denning, or summer feeding for moose, caribou and bears should be designated as Habitat.

" The BBAP should restore subsistence use as a land use management classification and provide a priority for this designation over other uses.

" Sulfide rock mining should be prohibited from all BB drainages that have waters important for anadromous fish, especially salmon. There should be an immediate ban on any new mining claims in any of these watersheds. Worldwide, mining has been proven detrimental to surface and ground water quality. Most of that activity occurs in desert environments, whereas the BB region is a swamp by comparison. The amount of short-term income to be realized by the state from any new mineral extraction does not warrant the risk to the long-term sustainable salmon resource extraction and economic benefit.

" Restore public involvement in the state planning process. The 2005 BBAP revision and the 2013 amendments did not adequately involve the people in the region that the plan effected. The DNR BBAP does not seem to adequately represent the people of the region's, the state's, or habitat's best interest.

DNR's BBAP seems to ignore much of the data that is available for the region and the past history of public and state cooperative planning efforts. I support the CABBAP and feel that it provides a more balanced approach to management of State resources and habitat protection.

Thank you for this opportunity.

Mark Lisac

Dillingham, Alaska.

Comment 268 of 497 - submitted on 05/07/2013 at 10:09 PM:

May 5, 2013

RADS/DMLW

Alaska DNR

550 W. 7th Ave

Anchorage, AK 99501

Dnr.bbapamend@alaska.gov

Re.: Comments on the Bristol Bay Area Plan and amendments.

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I attended the BBAP community meeting in Dillingham to discuss the DNR's plan amendments as a result of the lawsuit. The stated purpose of the meeting was to clarify the purposes for the 2005 plan revision. Instead I became more confused. The stated purpose for revising the 1984 plan was a need to take a broad scale approach to land classification, yet the plan needed to refine management classification down to smaller areas(?). This statement is used to justify why broader habitat classifications and multi purpose management classification were replaced with mineral extraction as the sole purpose for much of the area affected by the plan.

In response to questions and lawsuit Causes regarding the non-designation of small, non-navigable anadromous stream sections as habitat, DNR states in the briefing materials from the meeting

a) "...that it is not practical to classify all streams as Habitat since it would not be possible to depict them on plan maps, which are the basis for our official records (status plats)".

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The state does also own the land associated with the non-navigable streams as well.

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The state should not relinquish ownership or responsibility of lands and waters important as habitat for anadromous fish and other wildlife.

d) it is unnecessary since Chapter 2 management guidelines affect all anadromous streams and provide protection.

This discussion referred to the State's Title-16 protection authority, yet it was stated that DNR had no enforcement program. A case in point was the contamination that has already occurred in many areas (especially the Pebble prospect) where test drilling associated with mining exploration has taken place and drilling mud has been deposited on surface vegetation.

I support the amendments in the Citizen's Alternative Bristol Bay Area Plan (CABBAP) that was developed by BB area tribes, commercial and sport fisherman, and business interest. I especially support:

" Restore protection for fish and wildlife Habitat; Subsistence Use; and Recreational Use. Nearly the entire area addressed in the plan is important for one or more of these Use categories. The plan should include these as the priority management designation.

" Restore Habitat classification to the majority of the BB planning area because the entire area is important habitat for fish and wildlife. Other uses should be secondary to habitat protection. Changing land use designations over time leads to the destruction of habitat. You only need to review man's history from the Atlantic Ocean, California, Pacific Northwest and Canada where development has been given priority over habitat protection. Atlantic and Pacific salmon runs have been severely reduced or extirpated from these areas. Alaska should learn from the mistakes others have made, and protect our renewable resources that the State holds in trust for the use of the people.

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" Restore public involvement in the state planning process. The 2005 BBAP revision and the 2013 amendments did not adequately involve the people in the region that the plan effected. The DNR BBAP does not seem to adequately represent the people of the region's, the state's, or habitat's best interest.

DNR's BBAP seems to ignore much of the data that is available for the region and the past history of public and state cooperative planning efforts. I support the CABBAP and feel that it provides a more balanced approach to management of State resources and habitat protection.

Thank you for this opportunity.

Mark Lisac

Dillingham, Alaska.

Comment 269 of 497 - submitted on 05/02/2013 at 02:29 AM:

Dear Sir:

As you are aware, the courts have ordered the State of Alaska to re-do the plan proposed for the Bristol Bay area. This is one of the few areas left in the World wherein an intact ecosystem still fully functions and provides both economic and cultural benefits for the citizens of Alaska as well as other people in the United States of America. I urge you to adopt the Citizens Alternative Bristol Bay Area Plan which was based on genuine scientific studies and supported by six local tribes in Alaska and commercial and sport fishing organizations.

Sincerely,

John Lisowski

Juneau, Alaska

Comment 270 of 497 - submitted on 04/19/2013 at 12:00 AM:

Re: Suggestions to improve DNR's public meetings on proposed amendments to 2005 BBAP.

Several of my clients, which are the tribal councils of Nondalton, Koliganek, New Stuyahok, Ekwok, Dillingham (Curyung) and Levelock, the Alaska Independent Fishermen's Marketing Association (AIFMA), and Trout Unlimited, are concerned about the procedures and substance of DNR's public meetings on its proposed amendments to the 2005 Bristol Bay Area Plan (BBAP). They and others asked me to offer suggestions.

I obtained a recording of most of the meeting at Iliamna. I also received notes from an attorney who attended the meetings in Igiugig, Naknek and Port Heiden. I sent a draft of this letter to my clients, to communicate the substance of the recording. Several wanted to sign this letter with me. I am providing that opportunity below.

The planning statutes require meaningful public participation in the planning process. With that in mind, I and my clients offer the following suggestions for (A) DNR's procedures for notice and comment, and (B) the substance which DNR communicates at these meetings.

A. Suggestions regarding the procedures for notice and comment.

1. DNR must provide notice calculated to inform.

DNR gave only a few days notice of the meetings at Iliamna, Igiugig, Naknek and Port Heiden. I understand that Dillingham protested a short notice, and that DNR rescheduled that meeting with better notice. The law requires notice reasonably calculated to inform. The first four communities had inadequate notice since it was not reasonably calculated to inform. I appreciate that the next round of meetings, including at Dillingham, will have better notice.

2. DNR must make an adequate administrative record.

You should make recordings of the meetings, conduct them as informal hearings, record the entire meeting, make sure all oral and written comments received at the hearings become part of the administrative record, document who the speaker is for each comment, etc. And, you should probably conduct a hearing in Anchorage.

B. Suggestions regarding the substance which DNR communicates at these meetings.

1. Avoid misleading the public about the parties to the litigation.

The tribal councils of Nondalton, Koliganek, New Stuyahok and Ekwok sued in May 2009. In June 2009, tribal councils for Dillingham (Curyung) and Levelock joined as plaintiffs. In August 2009, AIFMA, which is an association of commercial fishers in Bristol Bay, and Trout Unlimited, joined as plaintiffs.

In the Iliamna recording, you created a false impression that Trout Unlimited was the lead plaintiff. You did not mention "tribe," "tribes" or "tribal councils." You garbled Nondalton as "Noldotten" or "Nol Dotten," did not identify it as a tribe or tribal council, did not identify the other villages, tribes or tribal councils that were plaintiffs and simply referred to them as "other organizations." You did not name AIFMA in any manner and mischaracterized it as a "seafoods processor." Trout Unlimited was the only plaintiff you identified correctly.

When someone in the audience asked why Trout Unlimited sued and whether it wanted the area to be its "playground," you never disabused that person of the false impression you created that Trout Unlimited was the lead plaintiff. In fact, it was the last to join the case. So, it appears that you were trying to create tension between local and non-local people. You must avoid doing so in the future.

2. Avoid misleading the public about the issues in the litigation.

The 2005 BBAP, at p. 2-9, lists fourteen "fish and wildlife categories" which the 2005 BBAP says it used to identify and designate land as habitat. The plaintiffs challenged the use of such criteria with respect to uplands because most of these "fish and wildlife categories" related to the marine environment.

At the Iliamna meeting, you claimed that DNR did not do what the BBAP itself says DNR did do. You should not deny what the 2005 BBAP says. Similarly, you asserted in Iliamna that DNR did not use the definition of "recreation" in the glossary for purposes of land designation, classification and management. That definition defines "recreation," absurdly, as excluding sport hunting and sport fishing. You need to explain why DNR drafted that definition to exclude sport hunting and fishing if you are going to claim that DNR did not use it.

3. Keep the relationship between designated and undesignated uses simple by focusing on conflict between uses.

You need to state clearly that, in the event of conflict between a designated use and an undesignated use, the designated use trumps the undesignated use. Doing so helps people to understand the importance of designated uses and corresponding classifications.

At Iliamna, you did not do so. Instead, you claimed that some people believe that a habitat designation bars mining, and you then asserted that all mines on state lands are on land classified as habitat. That may or may not be true, but that is not the point. The point is that when conflict occurs between uses, a designated use trumps undesignated use.

By focusing on that point, you can be clear and avoid overstating or understating that a habitat designation always or never stops mining. DNR's draft determination and amendment, at p. 22, overstate by asserting that habitat classifications prevent development projects. At Iliamna, you understated by asserting or implying that habitat classifications are not capable of precluding mining. Neither is true. A habitat classification does so only if the development is incompatible with habitat as a designated use and classification. A classification is essentially a priority use.

4. Avoid garbling navigable and non-navigable waters.

At Iliamna, you misleadingly asserted that the state owns the waters of "navigable" streams, but that the state does not own the waters of "non-navigable" streams, and that "somebody else does." This implied falsely that the tribes and their co-plaintiff-petitioners err in seeking habitat classifications of non-navigable anadromous waters. The state owns the

waters regardless of navigability. The State has owned the beds of navigable waters since statehood. The State owns the beds of non-navigable waters if selected and conveyed under the Statehood Act or a land exchange, such as the Cook Inlet land exchange by which the State acquired the land at Pebble, including that of non-navigable anadromous fish streams (Upper Talarik and North and South Fork Koktuli) to protect fish.

5. You misled the public by claiming that the BBAP does not affect subsistence.

At Iliamna, you claimed that the BBAP does not affect subsistence. Although area plans do not set seasons, bag limits or other regulations adopted by the boards of fisheries and game, the plans do affect land management which affects subsistence. That is why EPA's draft Watershed Assessment addresses subsistence. You should avoid misleading the public by claiming that the BBAP does not affect subsistence. With respect to Pebble and similar mines in the area, it is not credible to claim that increased competition and access will not affect subsistence.

6. Your assertion that DNR has little control over mining on mining claims supports EPA's use of 404(c) and state legislation to address metallic sulfide mining in the Kvichak and Nushagak drainages.

At Iliamna, you asserted that because a mining claim is a property right, a claimant has the right to develop consistent with state law, and that "DNR has relatively little control of that particular aspect." You asserted that "DNR does not have authority to make a decision on a mining claim," and that it "takes a legislative act to close an area to mining." You asserted further that "if you're trying to affect mining, it's difficult to do through authorizations, because we [DNR] really don't have the authority," and it "has to be a legislative act, not an act of DNR."

Though I do not view DNR's authority as so limited as you state, I appreciate that you steered people to other authority, including that of the legislature. You might explain that "if the public is trying to affect mining" (as you said in discussing DNR's authority), or that if the public seeks to "preclude" Pebble or similar mines (as you put it in discussing habitat classifications), then the public might consider supporting federal and state actions to do so. On the federal side, that would be an express prohibition by EPA in a § 404(c) determination. On the state side, that would be state legislation. You can help people understand that even if DNR lacks authority to prevent Pebble and other metallic sulfide mines, EPA and the Alaska Legislature do not lack such authority. Pointing that out would be useful information once you have taken that position, as you have, that DNR lacks authority to prevent Pebble and similar mines.

CONCLUSION

DNR's 2005 BBAP and proposed amendments have resulted in DNR asserting that it has little authority over mining authorizations on mining claims. That undermines contrary assertions that the State has a rigorous permitting process. That, in turn, bolsters the likelihood that EPA will act under § 404(c) of the Clean Water Act. That, in turn, may prompt the Alaska Legislature to act to conserve the Kvichak and Nushagak drainages or face a federal takeover of the issues of permitting metallic sulfide mines in those drainages.

In the meantime, you should: (1) acknowledge that the 2005 BBAP erred by using mostly marine criteria to identify habitat, by defining recreation to exclude sport hunting or fishing, and by defining mineral land more expansively than regulations provide; (2) identify the plaintiffs correctly as mostly tribes or tribal councils; cease claiming or implying that Trout Unlimited was lead plaintiff when Nondalton Tribal Council was; cease garbling Nondalton Tribal Council as "Nol Dotten"; and cease claiming that AIFMA is a seafood processor; (3) cease misleading the public about the relationship between designated and undesignated uses; (4) cease misleading the public about navigable and non-navigable waters by claiming or implying that someone other than the state owns non-navigable waters and their beds; and (5) cease misleading the public by claiming that the BBAP does not affect subsistence.

Sincerely,

Ekwok Village Council, Curyung Tribal Council, Nondalton Tribal Council, Levelock Village Council, New Stuyahok Traditional Council, New Koliganek Village Council, Alaska Independent Fishermen's Marketing Assoc, Trout Unlimited, and Geoffrey Parker, Attorney, Co-Counsel to the above Six Tribes, AIFMA and TU

Comment 271 of 497 - submitted on 03/18/2013 at 12:00 AM:

RE: A preliminary draft of the Citizens' Alternative Bristol Bay Area Plan

Enclosed is our preliminary draft of the Citizen's Alternative Bristol Bay Area Plan. The cover letter and preliminary draft commence our comments on DNR's proposed amendment to the Bristol Bay Area Plan ("BBAP").

In 2005, the Alaska Department of Natural Resources ("DNR") drastically changed its land management approach in Bristol Bay and eliminated the habitat land classification for nearly 94 percent of the region. In response, the tribal councils of Nondalton, Koliganek, New Stuyahok, Ekwok, Curyung and Levelock, and the Alaska Independent Fishermen's Marketing Association and Trout Unlimited filed suit. The case was ultimately settled when DNR agreed to amend the 2005 Bristol Bay Area Plan.

DNR's proposed amendments are currently available for public review and comment. Although DNR made some improvements, the revisions did not go far enough. In response, the aforementioned parties, created the Citizens' Alternative which seeks to restore protections for vital fish and wildlife habitat and subsistence and recreational uses. The purpose of the preliminary draft is to promote meaningful public participation, open a dialog with DNR and fully inform DNR of our efforts.

Towards those ends, we have invited DNR to hold meetings in Bristol Bay with Bristol Bay residents. DNR has not responded. However, we have held regional scoping meetings for a Citizens' Alternative. As DNR is well aware, meaningful public participation is required by law and we look forward to its full participation in that effort before the amended BBAP is finalized.

A draft Citizens' Alternative is an unusual "public comment," but, nevertheless, a comment we felt was necessary because neither the 2005 plan nor DNR's proposed amendments go far enough to adequately address the vision the vast majority of local residents have for Bristol Bay. We encourage DNR to use our draft and its proposed amendments to make a better plan.

The Citizens' Alternative offers a new and better plan. It rests upon these core principles.

1. The Citizens' Alternative relies on science and better mapping to designate primary uses on State lands and improve public awareness and participation.

The Citizens' Alternative contains GIS maps depicting essential and important habitats, and subsistence and sport hunting and fishing use areas. It is derived from data generated by ADF&G, DNR and other sources. We used this information for three purposes: (1) to designate primary uses, (2) to inform DNR adjudicators and the public about the resources and uses that should be considered within the particular units during future decision-making processes, and (3) to improve the unit-specific statements of management intent and the unit-specific inventories of resources and uses.

In contrast, DNR's 2005 BBAP did not contain a single map of any habitat type or subsistence or recreation use areas. DNR's 2013 proposed amendments contain only one habitat map, and it is for moose. The lack of such maps departs from the previous 1984 BBAP, frustrates meaningful public participation, and leads to inconsistent results. For example, DNR proposes to designate some moose wintering areas as habitat, but not those areas near Pebble in the Upper Talarik Creek. Our reliance on ADF&G data and maps avoids inconsistent, subjective judgments that lack foundation in the record and appear to be arbitrary.

Unlike DNR's approach, the draft Citizens' Alternative justifies each designated use and corresponding classification using maps to avoid confusion and fully inform the public. We hope DNR will adopt this approach. To do otherwise, hinders management decisions and frustrates the public process.

2. The Citizens' Alternative is consistent with the vision statement of the Bristol Bay Visioning Project and the history of state, federal, local and tribal efforts to balance conservation and development in the Bristol Bay drainages.

The Citizens' Alternative implements the vision statement adopted by the Bristol Bay Visioning Project. The Visioning Project was a multi-year scoping project sponsored by Bristol Bay Native Association, Bristol Bay Native Corporation, Bristol Bay Economic Development Corporation, Bristol Bay Housing Authority, and Bristol Bay Area Health Corporation. <http://www.bristolbayvision.org>. The visioning Project convened meetings in every village of the region and gathered detailed input from the people of each village on a variety of issues. The results from the Visioning Project clearly showed that the vast majority of the people living in Bristol Bay seek:

- To protect subsistence;
- To protect salmon, other fish, wildlife, waters and renewable resources;
- To protect and encourage a local economy based upon renewable resources; and
- To allow non-renewable resource development that doesn't threaten these other goals.

The Citizens' Alternative is also consistent with past state, federal, local and tribal efforts to balance conservation and development in the Bristol Bay drainages and to conserve the Kvichak and Nushagak drainages in particular. Historically, the State pursued many actions, from 1967 to 2005, to foster conservation of the Kvichak and Nushagak drainages. In fact, DNR's historical record makes it crystal clear that the State acquired the lands at the Pebble deposit, not by selection under the Statehood Act, but by land exchange in order to protect fish. (Please see attached timeline for further detail).

3. The Citizens' Alternative improves area-wide management guidelines.

The Citizens' Alternative significantly revises the area-wide guidelines to ensure that habitat, recreation, and subsistence are protected. These revisions include:

- Reinstating the areawide instream flow protection for fish from the 1984 Plan;
- Incorporating the use of the "precautionary principle" when making any land use decisions that may significantly impact salmon;
- Establishing a presumption that all waters in the Bristol Bay region are anadromous;
- Prohibiting metallic sulfide mining in the Nushagak and Kvichak watersheds; and
- Adopting a new mineral closing order to ban new mining claims on or along cataloged anadromous streams potentially threatened by mining.

We look forward to working with DNR to finalize a 2013 Bristol Bay Area Plan that incorporates our recommendations.

Sincerely

Comment 272 of 497 - submitted on 05/01/2013 at 03:57 PM:

After reviewing the State's 2005 Bristol Bay Area Plan and thinking about the proposed amendments, I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative is a far better plan and includes many of the reasons why I live in the Bristol Bay borough.

Comment 273 of 497 - submitted on 04/19/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in a meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

I drink and eat out of this as yet clean water!

Sincerely

Comment 274 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish

- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages

- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining

- Use voluntary cooperative planning

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 275 of 497 - submitted on 05/06/2013 at 12:00 AM:

I was born and raised in Togiak. I am the President of the Togiak Traditional Council, Member of the Ice Seal Commission, Quassiq Walrus Commission, Bering Sea Fisherman's Association and the Yuqimiutt Kulutstii Council.

First, I don't like the change of 1984 Bristol Bay Area Plan without letting each village know or visit them and change in 2005 Bristol Bay Area Plan Primary Land-use Designations. A lot of people in each village weren't aware of this change. That's why I would like to see more habitat classifications for wildlife and fish because even though I'm from Togiak we are Native people and we travel long distances to harvest tradition foods. We, the Native people of Togiak, travel as far as Mulchatna Hills and Aniak river areas for red meat. Also since commercial fish started, people from Togiak go fish in Nushagak and Naknek, Egigik and Ugashikto this date.

That's why we, the Native people of the Bristol Bay region, do not agree with DNR's decision and a lot of people in the Bristol Bay region will be hurt or affected. DNR's decisions have surprised a lot of people because DNR made those decisions without consulting us.

Our Traditional hunt and fish area needs to be protected. Not just salmon but all different kinds of fish, wildlife, and renewable resources. I don't like the 2005 decision. Because once (if) the mining starts it will affect our renewable resources that we use every day since time memorial. If its destroyed it will never be replaced as it was before. We, the Native people of Alaska don't go down to the Lower 48 to make these kinds of regulations and try to destroy the land and renewable resources down there.

Lastly, different agencies always come in a hurry and leave right away before we really understand and they don't give us much time to respond.

Thank you for giving me this short time to say what I think of. I would also appreciate if you can come to Togiak and listen to my Native people comments

Sincerely

Comment 276 of 497 - submitted on 05/02/2013 at 12:00 AM:

The draft is an improvement over the old one, but does not give due consideration to renewable resources. We must protect our clean water, salmon and other elements of the Bristol Bay ecosystem. Please adopt the Citizens Alternative Bristol Bay Area Plan. Thank you.

Comment 277 of 497 - submitted on 04/15/2013 at 07:17 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. I have also reviewed the Citizens' Alternative Bristol Bay Area Plan, and I endorse its approach for managing state lands. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative, while not perfect, does a much better job of addressing the reasons why I work in and visit Bristol Bay.

Comment 278 of 497 - submitted on 04/27/2013 at 09:48 PM:

I don't want mining in Bristol Bay. You know all the reasons why. Please consider all of us who oppose Pepple. Thank you. We are all in the same boat - fishing boat or not :)

Comment 279 of 497 - submitted on 04/26/2013 at 12:00 AM:

I respectfully submit the following comments concerning the Bristol Bay Area Plan for your consideration.

I am Nanci Morris Lyon a resident of King Salmon Alaska. I have been a sport fishing guide and subsistence user in the area for 29 years. I now own and operate Alaska Sportsman's Bear Trail Lodge, located on the confluence of King Salmon Creek and the Naknek River. I sit on several area boards, but I feel the one most relevant for this application might be the Regional Advisory Council for the Federal Subsistence Board, of which I am vice chair.

I was extremely unhappy with the new plan that was put into place in 2005 and have decided to make sure NOT to make the same mistake I did back then, by not speaking up and making my voice heard. Those of us who live and make our

home here MUST have the ability to subsist in a safe, clean environment and that needs to be the priority of the land. Everyone else who has an interest and lives elsewhere has many more choices than those of us who depend on the lands ability to provide for our needs. This realization needs to become the priority of the lands within our reach.

Instead of promoting development the land needs to promote life first, offering clean air, crystal clear water and a safe environment for animals and humans to continue to flourish. I think it might be wise to consider protecting the waters first as that will lead to everything else remaining pure. That could be accomplished by implementing a Mineral Closing Order that would ban new mining claims on any flowing waters. We definitely need to prohibit metallic sulfide mines and we also need to consider reestablishing the system used in 1984 that automatically reserved water levels for fish and when someone wanted to remove water from a stream, they had to prove no harm to fish.

If we do not acknowledge the subsistence need in the area by increasing the habitat classifications for wildlife and fish we will soon be without villages in the region. High quality winter habitat is essential for healthy moose and caribou populations and must be included and acknowledged in your plan. Without the winter habitat, we will lose our herds that are such a large part of our subsistence dependency.

I have sat on the Regional Advisory Council of the Federal Subsistence Board for 10 plus years and throughout the years concerns have continued to escalate about the ungulate populations in Bristol Bay. Concerns about herds diminishing and moving off, about moose being less available and those concerns have been present with only current developments in the area. I would not look forward to hearing the number of complaints and concerns from the area subsistence users should your new plan take effect and full implementation be realized by mining interests.

I look forward to seeing a revised plan, from your current efforts to listen to the bay area residents. I am hoping that it will include all of the essential elements those of us, who depend upon the land, will need to survive. Thank you for your consideration and I welcome any calls or contact to answer questions about my thoughts or clarification of any points.

Respectfully

Comment 280 of 497 - submitted on 05/06/2013 at 12:00 AM:

The Associated General Contractors of Alaska (AGC) is a trade association representing over 650 Alaskan businesses in the construction industry. On behalf of the AGC, those businesses and employees, I offer the following comments on the Alaska Department of Natural Resources (DNR) Draft Bristol Bay Area Plan (BBAP).

DNR has a constitutional obligation to manage state-owned lands and resources for the "maximum public benefit" based on the directive in Article VIII Section 2 of the Alaska Constitution. Sole designation of large sections of the state for wildlife or recreation is contrary to constitutional mandates. Alaska presently contains over 150 million acres of conservation units where most development activities are banned. In Southwest Alaska there are already millions of acres of land closed to development by federal action. Do not further restrict the use of land in Alaska through State action.

The BBAP will manage approximately 19 million acres of State land. Much of the lands in the BBAP are resource rich and presently designated for mining. It has been shown in every instance of recent resource development in Alaska that development and fish and wildlife abundance coexist well.

We believe the proposed revisions to the 2005 BBAP adequately protect wild game, salmon, subsistence, recreation, sport fishing, or other public uses of land, fish, and game.

Thank you for the opportunity to comment.

Sincerely

Comment 281 of 497 - submitted on 05/06/2013 at 12:00 AM:

I am against restricting any and all banning of specific activities and the selective slicing of uses of an area because the perceived consequences. Specifically I see this as restricting mining on land listed as mineral rich in our inventory. The 2005 BBAP struck a balance between various stakeholder interest and I do not believe alteration beyond those agreed to in the lawsuit, Nondalton Tribal Council v. State of Alaska is needed.

It's odd that we continue to restrict anything that will produce a job and a means of supporting Alaskans without a government handout.

Thank you for your time.

Comment 282 of 497 - submitted on 05/01/2013 at 09:28 AM:

I support the Citizen's Alternative plan.

Comment 283 of 497 - submitted on 05/02/2013 at 12:00 AM:

Hello. It is my opinion that the 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments are not necessary. Furthermore, the revisions set a dangerous precedent for future area plans.

Comment 284 of 497 - submitted on 05/04/2013 at 07:17 AM:

The EPA needs to protect Bristol Bay NOW! We don't want to ruin our last native salmon runs and ruin our precious state of Alaska all in search of gold and copper for a FOREIGN company! This is outrageous! If we went abroad and tried to do something of this magnitude in someone else's country they would NEVER allow it! This will devastate the native peoples and homelands let alone their traditional ways of life. NO PEBBLE MINE EVER!

Comment 285 of 497 - submitted on 05/06/2013 at 12:00 AM:

Living in Alaska the past 33 years, I know how valuable the Bristol Bay area fisheries are. I know how important they are to the families of Bristol Bay and all around the State, for those who take part. The richest fishery in the world.

Although the Revised Bristol Bay Area Plan is a slight improvement to the 2005 plan, I would much prefer to see the State DNR adopt the Citizen's Alternative Plan for Bristol Bay. Who knows the area better than the Citizens? Their views, their input needs respect from the State.

Please adopt the Citizens Alternative Plan for Bristol Bay.

Thank you

Comment 286 of 497 - submitted on 05/05/2013 at 06:51 PM:

I love salmon

Comment 287 of 497 - submitted on 05/06/2013 at 04:45 PM:

I would like to submit the following comments regarding the Bristol Bay Area Management Plan Amendment 2012.

While I am certain that you will receive many comments regarding the environmental and cultural impacts of the current area Bristol Bay Area Management Plan as opposed to the previous plan, I would like to focus just on a generally overlooked but very important factor; that is fiscal impact. The current management plan clearly favors extractive resource development, such as hard rock mining, over the harvesting and management of renewable resources. While DNR apparently believes that this sort of development will provide substantial economic value and jobs, it fails to recognize where the benefits of this value goes, where many of the job holders will come from, and what the cost will be to the State of Alaska, and all of its residents, to support these benefits.

It is well recognized that in Alaska resource development which attracts a non-resident labor force generally has a negative fiscal impact on the state. New families that move here will need new schools, infrastructure, and other state services. But, because we don't have a state income tax and our other taxes tend to be low, these new residents will not be paying for much of these new services. The rest of us Alaskans will be paying due to less funding per capita for existing governmental services. This fiscal liability is worsened by the virtual give-away of hard rock minerals by the state because of the current tax structure. Unlike the oil industry, mining in Alaska does not pay its way.

Adding to the fiscal liability of extensive hardrock mining in the Bristol Bay region will be the cost of the big ticket infrastructure that the mining industry will be asking the State to pay for. Industry will want the State to build roads, harbors, power lines, and power plants, etc. They will, in part, base their argument for state subsidies on the questionable assumption that these facilities might also serve others. But what they will fail to say is that the scope and costs of these facilities would not be needed if the mines were not developed.

Given the red flags that are now being waved regarding Alaska's fiscal future, DNR needs to carefully look at the fiscal impacts that might occur, given current taxes etc, if one or more large mines are developed in the Bristol Bay Area. Apart from all the other arguments, DNR needs to be certain that we can afford this.

Comment 288 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 289 of 497 - submitted on 05/01/2013 at 10:39 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I (live in, work in, visit) Bristol Bay.

Comment 290 of 497 - submitted on 04/30/2013 at 11:43 AM:

Mining is a bad idea in Bristol Bay and I support the Citizens' Alternative Bristol Bay Area Plan. Especially from a foreign owned mining company with a terrible track record for protecting the environment. Once more it generates little or no revenues for the state or local citizens. We need to toughen our environmental protections and increase state taxes on mining. Mining is devastating to the environment and miners seem to think they answer to no one. I have witnessed them put in illegal ATV trails, take game out of season and set up permanent camps and threaten by passers on land they do not own.

Mark L McKinney

Comment 291 of 497 - submitted on 04/28/2013 at 09:19 PM:

This email is to say that I support the Citizens Alternative Bristol Bay Area

Plan and urge the Dept. of Natural Resources and those state officials to work together to establish and implement an area plan that is suitable for the whole of Bristol Bay and it's environs.

Comment 292 of 497 - submitted on 05/03/2013 at 12:00 AM:

It is baffling to me that as resident and member of the business community in Alaska that we are constantly fighting to keep lands accessible for development.

The agreement struck in the 2005 BBAP does have a good balance for everyone involved and does not need amendment.

Revising this agreement would set a very bad precedent for the future.

I encourage the DNR to stick with the well thought out and negotiated plan that is place. To go through a lengthy and expensive "re-review" does not make good fiscal or governmental sense.

Regards

Comment 293 of 497 - submitted on 01/15/2013 at 12:00 AM:

Thank you for releasing the draft Determination of Reclassification and Plan Amendment for the 2005 Bristol Bay Area Plan (BBAP). I write to request that DNR hold public meetings in the Bristol Bay region to solicit input on these documents.

The planning process for area plans, as laid out on DNR's website (<http://dnr.alaska.gov/mlw/planning>), specifically includes public meetings as part of the public review process. Moreover, previous proposals to create or amend the BBAP included meetings in Naknek, King Salmon, Dillingham, New Stuyahok, and Newhalen. Holding public meetings on the current public review draft in the Bristol Bay region will facilitate meaningful involvement in your proposal, which, as you know, is one of the fundamental tenets of the area planning process. Doing so is particularly important in the Bristol Bay region, where subsistence, culture and the economy are inextricably linked to the State's management of its land. Additionally, many residents and BBNC shareholders use English as a second language and come from cultures that value and use the spoken word as the primary means of communication. Holding hearings in the region will thus help facilitate the important contribution that these individuals can make to the public review draft.

Given the importance of the area plan to Bristol Bay residents and BBNC shareholders, and the central role public meetings play in the planning process, I urge you to hold public meetings throughout the Bristol Bay region early in the public review and comment period. These meetings offer the best means of introducing valuable regional input to the planning process.

Sincerely

Comment 294 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.

- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

Additionally, I am concerned about potential oil and gas exploration licensing and Areawide oil and gas leasing in this region, as well as offshore oil and gas leasing, exploration, and development (including onshore infrastructure) because it poses risks to clean water, would require vast quantities of water, would cause harmful disturbance of caribou, migratory bird, fish and other habitats. Therefore, I urge that no lands within the Bristol Bay Fisheries Reserve be leased for oil and gas (including exploration licensing), nor any lands and waters classified for habitat by the plan. Alaskans have spoken out time and time again in support of protecting the habitats for fish and wildlife, including the vital nearshore waters within the Bristol Bay Fisheries Reserve. Please uphold this Alaskan tradition in the plan.

Again, I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan, and respond to my additional concerns. Thank you.

Sincerely

Comment 295 of 497 - submitted on 05/03/2013 at 12:00 AM:

I am an Alaska resident and commercial setnet fisherwoman. I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

I am writing in support of the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

Increase habitat classifications for wildlife and fish.

Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.

Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.

Use voluntary cooperative planning.

Reestablish the system used in the 1984 plan that automatically reserved water levels for fish, and if someone wanted to take water out of a stream, they had to prove no harm to fish.

Create a Bristol Bay Advisory Board made up of local resident.

Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).

Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.

Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Sincerely

Comment 296 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years

working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 297 of 497 - submitted on 05/01/2013 at 10:43 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I (live in, work in, visit) Bristol Bay.

Comment 298 of 497 - submitted on 05/06/2013 at 12:00 AM:

As a cannery workers of Dillingham, Alaska I affix my signature to this petition requesting that DNR include in the revised Bristol Bay Area Plan, the following:

- A subsistence land classification category
- Classification of all anadromous waters as habitat, regardless of navigability
- Increased habitat classifications for fish and wildlife
- Prohibition of metallic sulfide mines in the Nushagak and Kvichak drainages
- A new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining

- Water level protections for fish as they were in the 1984 plan, such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- A new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Voluntary cooperative planning
- Creation of a Bristol Bay Advisory Board
- Implementation of the Precautionary Principle as it was adopted by the Alaska Board of Fisheries
- Operate under the presumption that all waters in Bristol Bay are needed for salmon, unless proven otherwise

We trust that the DNR recognizes the importance of the Bristol Bay salmon habitat to the livelihoods of the thousands of cannery workers whose incomes support the basic needs of food, shelter, clothing, education and health of themselves and their dependents. That these cannery workers have dedicated their lives to the seafood industry of Bristol Bay as will the many cannery workers for generations to come as their way of life.

Looking forward to a positive response to this petition, I remain

Sincerely

-a decade of service in Bristol Bay, Alaska-

"will be my way of life and my children's for decades to come"

Comment 299 of 497 - submitted on 04/03/2013 at 12:00 AM:

I am writing in regards to the 2013 Revised Bristol Bay Area Plan.

Please make sure the plan includes the following:

- 1 A subsistence land classification category
- 2 classification of all anadromous waters as habitat, regardless of navigability.
- 3 increased habitat classifications for fish and wildlife.
- 4 prohibition of metallic sulfide mines in the Nushagak and Kvichak drainages.
- 5 a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- 6 voluntary, cooperative planning
- 7 water level protections for fish as they were in the 1984 plan, such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish.
- 8 creation of a Bristol Bay Advisory Board.
- 9 implementation of the Precautionary Principle as it was adopted by the Alask Board of Fisheries, meaning that "If you don't know, err on the side of caution"
- 10 operate under the presumption that all waters in Bristol Bay are needed for salmon, unless proven otherwise.

We must use all tools we have to protect clean fresh water - vital for our very existence on this planet.- sustainable fisheries in the largest remaining wild salmon run on earth. Nothing can replace these. Please add my comments to the public record and use them as official written public comment for the discussion of the upcoming revision of the Bristol Bay Area Plan.

Sincerely

Comment 300 of 497 - submitted on 05/03/2013 at 11:48 AM:

I am a long-time Alaska resident and I support the Citizen's Alternative Bristol Bay Area Plan. Thank you.

Comment 301 of 497 - submitted on 05/01/2013 at 03:52 PM:

Dear Folks at DNR-

I am submitting the following comments in regards to the review and revision of the Bristol Bay Management Plan. I am an Alaskan resident of 26 years, and I have fished commercially in the Ugashik District of Bristol Bay for 5 years, this summer will be year 6. I intend to work in this industry as long as I am able. I am commercial fishing with my two children ages 9 and 12, and anticipate that they will be involved in the commercial salmon fishery in Bristol Bay in some form as they become adults. The revisions to the Bristol Bay management plan need to put the highest priority on maintaining a healthy habitat for returning salmon. As a world community, we have made many mistakes in regards to other salmon populations which have disappeared as a result of habitat destruction due to human activities. We can do the right thing in Bristol Bay to be sure that the salmon which live there continue to thrive.

I suggest that The Citizens Alternative significantly revises the area-wide guidelines to ensure that habitat, recreation, and subsistence are protected. Some of the revisions are:

an automatic instream flow protection for salmon

use of the precautionary principle when making any land use decisions that may significantly impact salmon

a presumption that all waters in the Bristol Bay region are anadromous

prohibition of metallic sulfide mining in the Nushagak and Kvichak watersheds

a new mineral closing order that would ban new mining claims on or along salmon spawning streams potentially threatened by mining.

Thank You for your attention to my concerns.

Sincerely, Howard Mozen

Comment 302 of 497 - submitted on 04/30/2013 at 02:20 PM:

I want to add my name in support of the Citizens Alternative Bristol Bay Area Plan. Although I live in the Interior of this state, I feel that the Bristol Bay ecosystem deserves strong protection from large-scale mining operations because its productivity is so vulnerable. So valuable, yet vulnerable.

Comment 303 of 497 - submitted on 05/06/2013 at 10:51 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I live, work and raise my family in Bristol Bay. Our lifestyle is important to use and when it is all gone we cannot eat the money that was made or the waste that was left behind.

Comment 304 of 497 - submitted on 05/06/2013 at 10:45 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I Live, work and raise my family in Bristol Bay. Our lifestyle is important to use and when it is all gone we cannot eat the money that was made or the waste that was left behind.

Comment 305 of 497 - submitted on 05/01/2013 at 10:00 AM:

To Whom it Concerns,

As an Alaskan, I am submitting my support towards amending the 2005 BBAP back to it's 1884 stated principle of protecting stream flows for the fish that are the lifeblood of Bristol Bay. This needs to be included in any decisions which might adversely affect salmon spawning or rearing. In particular, large scale metallic sulfide mining poses a real and great threat to the watersheds flowing into Bristol Bay. International mining interests need to take a backseat to preserving our greatest resource that is pristine waters and the salmon that thrive in it. Our State is under huge financial pressure to take short-term jobs over the preservation of subsistence rights and the economics of the Sport Fishery. I hope that Alaskan's public input trumps political ideology and special interest monies.

Regards,

Bruce Neeno

Comment 306 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 309 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident, I'm writing to provide a comment on the State's DNR revisions to the 2005 Bristol Bay Area Plan.

The State of Alaska hasn't involved to consult with the tribes of Bristol Bay; subsistence and commercial user groups; sport fish groups; Borough governments; and those that may be involved and public.

- recent revisions to the BBAP; didn't provide protection for the BB region
- increase the habitat protection for wildlife and fish
- did not take in ??? for protection of its habitat; caribou and moose calving; brown bear
- did not take in considering the protection of anadromous streams and its species
- did not take in considering the protection of Bristol Bay watershed and its eco-system
- did not take in consideration of the public due process in allowing mining companies to conduct exploratory drilling and ??? at Lower Talarik; the Koktuli area and Mulchatna/Nushagak; and where areas are allowed; due to its anadromous system; especially the Fry Pan area and its affiliated areas that are linked

Recommendations for Review:

- link certain sections of 1984 plan to be incorporated to existing plan
- create steering committee board
- Implement precautionary principle when making land management decisions adopted by the Alaska Board of Fisheries
- include criteria for subsistence for land use planning

The State of Alaska has the following: "World Class Fishing"/"World Class Hunting" "World Capitol of Bristol Bay Sockeye." Protect and involve due process when it affects/effects the area or region.

Comment 310 of 497 - submitted on 03/15/2013 at 11:32 AM:

Revert back to its original plan and have the public process involved, rather than the State of Alaska high level workers conduct, which in my opinion was insufficient, to create a mining district in Bristol Bay without the public's involvement. This document was created by the Bristol Bay watershed residents, interested folks, agencies and should have been involved when the mining district was created. But this process never happened.

Now, we have mining companies, making claims and now lawsuits are being brought up. One example: save our salmon initiative, by Pebble.

Comment 311 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 312 of 497 - submitted on 04/19/2013 at 12:00 AM:

I am a lifelong resident of Dillingham and Bristol Bay. I am on the Board of Directors of the Bristol Bay Native Corporation.

I would like to thank DNR for undertaking the Bristol Bay Area Plan amendment and for coming to Dillingham to talk to folks about it. I am happy to see that you are re-designating some areas of our watershed to protect habitat and recreation. I am also glad that it leaves in the place mineral closing order and leasehold location order# 1.

However the plan should go much further to protect subsistence habitat and resources. DNR should re-consider its decision to not create a separate subsistence designation. The recreation and habitat designations do not adequately protect subsistence.

The small headwater feeder streams are just as important to protect as the larger downstream segments. DNR should designate as subsistence or habitat the non-navigable anadromous streams. This is important habitat to subsistence species and these species don't care weather the State thinks that it is navigable or un-navigable. It is important for them and they utilize it.

If it is DNR's objective to protect fish habitat it makes little sense to protect only the navigable sections of streams. It is important to keep the mineral closing order and leasehold location order in the final plan. They are important management tools.

I would encourage DNR to hold more meetings before the plan is finalized. Get out to the West side of Bristol Bay. You should take all of the comments that you have heard at these meetings and re-draft the amendment to include local concerns and have another round of public comment.

As a bottom line the plan needs to protect Bristol Bay Waters, culture and fishing jobs. The proposed plan is a start but more work needs to be done to create a plan that the region will support.

This is really important to the region. Thank you for coming here.

Comment 313 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 314 of 497 - submitted on 03/29/2013 at 12:00 AM:

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 315 of 497 - submitted on 03/29/2013 at 12:00 AM:

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In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 316 of 497 - submitted on 03/18/2013 at 12:00 AM:
RESOLUTION 2013-

A Resolution requesting that the Department of Natural Resources incorporate all matters specified below into its 2013 Revised Bristol Bay Area Plan, and supporting the Citizen's Alternative Bristol Bay Area Plan, and requesting public meetings and hearings.

WHEREAS, (New Koliganek Village Council) is the federally recognized Alaska Native tribe serving its tribal members and the community of (Koliganek); and

WHEREAS, (New Koliganek Village Council), acting as the duly elected governing body pursuant to the Constitution of (New Koliganek Village Council), has the authority to establish relationships and enter into contracts; and

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat

(1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Kuktuli River, the Upper Talarik River, and eight streams to south of Pebble block;

(2) navigable anadromous waters in their entirety, including the South Fork of the Kuktuli River to Frying Pan Lake;

(3) moose calving and some wintering areas to include the North and South Forks of the Kuktuli west of Pebble block;

(4) Western Iliamna Lake which is downstream from the Pebble deposit; and

(5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has-

(1) declined to establish a Subsistence land classification category comparable to the recreation category;

(2) declined to classify non-navigable anadromous waters as habitat;

(3) declined to classify much of the moose wintering areas as habitat; and

(4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, The (New Koliganek Village Council) expects that the Department of Natural Resources will incorporate the other considerations of the (New Koliganek Village Council) in their 2013 Revised Bristol Bay Area Plan to include:

(1) Establishing a Subsistence land classification category

- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvijack drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the (New Koliganek Village Council) requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the (New Koliganek Village Council) supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the (New Koliganek Village Council) requests that the Department of Natural Resources join with the tribal councils in holding public meetings on both DNR's proposed changes and the Citizen's Alternative in the villages that sued DNR as soon as possible, and in other communities.

Adopted this 4 day of March, 2013.

Comment 317 of 497 - submitted on 05/07/2013 at 12:19 PM:

Although I live in Anchorage now, I grew up in Dillingham and it will forever be my "home". Many of my family and friends still live in Dillingham and I visit every summer. When I go "home", I help my family put up fish to smoke, prep and can fish, and filet & seal fish filets to keep in the freezer. It would break my heart to go home and not enjoy these things that have been passed down to me from my ancestors. Please hear our concerns when we say NO to the Pebble Mine. This mine has the possibility to distinguish our way of life and it is not fair to take something away from us that has been ours for hundreds of years. By allowing this mine to be built, you are taking away our way of life, our jobs, our nourishment, our home.

Comment 318 of 497 - submitted on 05/01/2013 at 07:17 PM:

I support the Citizen Alternative, and I hope you will also.

Comment 319 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 320 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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Sincerely

Comment 321 of 497 - submitted on 05/06/2013 at 10:43 AM:

NO PEBBLE MINE. NO DESTRUCTION. NO TOXIC POISONS.

NO TO INHUMAN GOVERNMENTAL PRACTICES. NO IGNORANCE AND GREED.

YES TO NATURE. YES TO FISH AND FAUNA.

YES TO HUMANITY ALIGNED WITH THE EARTH'S NATURAL PROCESSES.

Comment 322 of 497 - submitted on 05/06/2013 at 12:00 AM:

I wish to extend my support for the Citizen's Alternative Plan for Bristol Bay and strongly encourage the State of Alaska DNR to consider adoption of this plan in its revision. Some of the strong points are:

1. an automatic instream flow protection for salmon
2. use of the "precautionary principle" when making any land use decisions that may significantly impact salmon
3. a presumption that all waters in the Bristol Bay region are anadromous
4. prohibition of metallic sulfide mining in the Nushagak and Kvichak watersheds
5. a new mineral closing order that would ban new mining claims on or along salmon spawning streams potentially threatened by mining

Thank you

Comment 323 of 497 - submitted on 04/26/2013 at 12:00 AM:

The Native people have been here and around Lake Iliamna since time began.

The hunt, gather, preserve and save for long periods of time,

People of Lake Iliamna, Don't sportfish and hunt, what natives do / subsistence is way of-life, not sport.

Time now-to-preserve and save, because of price on everything will raise,

The wild animals/plants, berries will-provide for people who know the-way of life-subsistence, not sport.

Comment 324 of 497 - submitted on 01/11/2013 at 10:42 AM:

The proposed open-pit gold mine would devastate the watershed, the salmon populations, and the livelihoods of commercial fishermen, fishing guides, and Native Alaskans. The Pebble Mine should not be allowed to develop this sensitive region. The Alaska DNR seems obsessed with justifying this ridiculous plan to mine Bristol Bay, despite widespread public opposition on the local, federal, and international level.

The Bristol Bay Area Plan Amendment 2012 does not provide sufficient protections for spawning salmon. Using "navigability" of streams as the sole qualifier for wildlife habitat is arbitrary and capricious. Anadromous and resident fish often use small, non-navigable streams as spawning habitat. This foolish notion of "navigability" implies that the Alaska DNR has a cozy relationship with industrial interests and little interest in protecting the Bristol Bay watershed. The public good is being trampled in order to allow the narrow interests of a private corporation to profit. What for? So a CEO can earn another hundred million dollars?

This is not only an environmental issue. It is a civil rights issue. The mine would cause inordinate and grievous harm to the Native Alaskans in the region.

What is more important, gold or salmon? You can't eat gold. Alaska's true wealth is its salmon.

This plan for the Bristol Bay shows that we have learned little since the time of the conquistadors. We are throwing away a place of matchless value for some fool's gold. It's ridiculous. Posterity is not going to judge us kindly.

Comment 325 of 497 - submitted on 04/26/2013 at 12:00 AM:

I CARE ABOUT THE FUTURE OF BRISTOL BAY'S FISH AND FAMILIES.

PLEASE, PROTECT THEM!

Save the salmon!

Comment 326 of 497 - submitted on 05/06/2013 at 01:00 PM:

The revisions to the 2005 Bristol Bay Area plan do not provide adequate protections for the region's lands and waters. I urge you to increase habitat classifications for wildlife and fish.

Please incorporate the Citizen's Alternative Plan in the final Bristol Bay Area Plan.

I attended a luncheon with Sen. Ted Stevens shortly before he died. Regarding large scale mining in the Bristol Bay region (notably, Pebble) he commented:

I am not opposed to mining. But Pebble is the wrong mine in the wrong place."

I believe that is how most Alaskans feel about mining in the Bristol Bay Watershed. Please protect this region forever! Do not have its destruction be your most lasting legacy.

Comment 327 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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Sincerely

Comment 328 of 497 - submitted on 04/19/2013 at 12:00 AM:

I am a life long resident of Dillingham and the greater Nushagak River watershed area. I along with my family operate a setnet operation on Ekuk beach in the Nushagak Bay. There I have spent my summers since being born in 1963. Being born here was something akin to winning the lottery on the day you were born. We have 5 generations of family fishing here. You might say that fishing agrees with us. We depend heavily on fishing for our income while each of us has other jobs & endeavors that we do throughout the year, we are first fishermen & everything in our lives needs to work around that. In general, DNR seemed to agree back in the 1980's. The 1985 Bristol Bay Area Plan seemed to have our backs. Jay Hammond had been our governor til 1982 and as a young man I had found a lot of comfort in that. I wanted him to run for president but I think he was too smart for that. It seemed to me that the state was looking out for the interests of the people from Bristol Bay, and put high priority on various fish and other renewable resources, as we did. Protecting fish was job one. More then came Governor Murkowski. It didn't take long for things to change. Than that its hope for the future. I first received a letter that the governor had chosen not to fund the shore fisheries division of DNR, and it wasn't long before it was apparent that he had something more than saving a buck in mind. He made one decision after another that adversely affected the fish and the fishery. Since that time I haven't had that same feeling of security as during the Hammond years, when it comes to the state looking out for my way of life. Out of Murkowskis administration came the 2005 Bristol Bay Area Plan along with the Pebble Mine prospect and the mother lode of insecurity with it. Im also a current member of the Nushagak Advisory Board to Fish and Game and wonder how close you will work with Fish and Game to fulfill your obligation to revamp the plan. Please consider that our community was founded and lives on fish and game and proceed accordingly. I would like to indicate my support for the Citizen's Alternative. Thank you for your time.

Comment 329 of 497 - submitted on 05/06/2013 at 12:00 AM:

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Sincerely

Comment 330 of 497 - submitted on 05/06/2013 at 12:00 AM:

I am writing to submit comments regarding the revised 2005 Bristol Bay. I am a freshwater ecologist with fifteen years of international experience in salmon ecosystems. For the past five years, I have had the great fortune to work in Bristol Bay on various salmon projects. In doing so, I have become familiar with what-as you know-is one of the world's last strong, self-sustaining salmon ecosystems. These are systems that are sustainable specifically because of their myriad of small-sometimes intermittent-headwater habitats that are particularly vulnerable to impact from development (Meyers et al. 2007), and crucial to maintaining the biodiversity of the system (Hilborn et al. 2006, Schindler et al. 2010).

Headwater streams, which are often intermittent, dominate the region surrounding the proposed Pebble deposit; an area prioritized as a priority for mining in the current Area Plan revision. Although headwater streams may compose almost 80% of total stream length in many drainage networks (Richardson and Danehy 2007), they are often unmapped and overlooked due to their small size and sometimes intermittent flow (Meyer and Wallace 2001). In the North Fork and South Fork Kaktuli Rivers and Upper Talarik Creek watersheds, headwater streams comprise more than twice the stream kilometers of mainstem habitat (746 headwater km and 306 mainstem km; The Nature Conservancy, personal communication 15 March 2012).

Because headwater and intermittent streams vary widely in physical, chemical, and biological characteristics, they provide varied and abundant habitats crucial to maintenance of diverse aquatic ecosystem function downstream (Meyer et al. 2007, Wipfli et al. 2007, Vannote et al. 1980). Headwaters may be influenced by groundwater or subsurface (hyporheic) flow and/or variable shade conditions, producing variable water temperatures often providing warm refuges during winter and cool refuges during summer (Power et al. 1999). Due to inputs of organic matter, headwater streams determine downstream nutrient dynamics (Richardson et al. 2005). Consequently, they foster a diversity and abundance of headwater species which provide source populations for colonization of downstream habitat as well as prey for fish species (Wipfli and Gregovich 2002).

Because they provide refuge from predators and competitors, rich feeding grounds, and thermal refuge, fish species often exploit low order and ephemeral streams as either residents (e.g., sculpin) or migrants (e.g., salmonids) (Brown and Hartman 1988). Salmonids may use headwater streams as rearing (e.g., coho, Chinook), (Brown and Hartman 1988, Wigington et al. 2006) and spawning (e.g., chum) habitat (Woody and O'Neal 2010). In a survey of 108 low gradient, headwater streams in the Nushagak and Kvichak drainages (Woody and O'Neal 2010):

- 96% of streams supported resident fish-many of which are important to subsistence,
- 75% of streams supported anadromous salmon species, and
- Most headwater streams surveyed were less than 0.5 m deep.

Headwater streams can also be important habitat for amphibians, birds, mammals, and other biota (Meyer et al. 2007). Headwater and intermittent streams are sites of enormous biological diversity, hosting hundreds to thousands of species (Meyer et al 2007).

Conservation of Bristol Bay salmon productivity relies in large part on the continued ability of headwaters-intermittent and not-to sustain them. Salmon use small headwater habitats for spawning, incubation and rearing. Some species remain in small non-navigable streams one to two years (Chinook, coho) prior to seaward migration making them particularly susceptible to watershed management practices. Because salmon adapt to natural flow regimes in their natal habitats, and

because natural flow regimes strongly influence thermal, chemical, physical and biotic regimes of natal habitats, significant alteration in these parameters can potentially reduce salmon productivity. It is widely recognized that loss and alteration of once productive salmon habitat has led to their extirpation and endangerment in US waters.

I appreciate your efforts to revise the Area Plan, and your consideration of public comment.

Thank you kindly

Brown, T. G. and G. F. Hartman. 1988. Contribution of seasonally flooded lands and minor tributaries to the production of coho salmon in Carnation Creek, British Columbia. *Transactions of the American Fisheries Society* 117:546-551.

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Comment 331 of 497 - submitted on 05/03/2013 at 09:00 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. It's clear to me that the State's plan places too little emphasis on recreational fishing & tourism and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The preferred Citizen's Alternative includes many of the reasons why I live and work in the Bristol Bay watershed, and why my adventure tourism business succeeds in the area. By not truly and honestly emphasizing tourism in the region, the 2005 plan is both inadequate and short-sighted. It is my strong recommendation that the State consider a broader approach to the Bristol Bay Area Plan.

Comment 332 of 497 - submitted on 04/28/2013 at 12:33 PM:

I support a Citizens Alternative Bristol Bay Area Plan as a better option for managing the Bristol Bay area.

Bristol Bay ia a natural resource that needs to be protected from any possible man made disaster, namely the Pebble Mine project.

Comment 333 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years

working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 334 of 497 - submitted on 05/02/2013 at 12:00 AM:

I would like to express my concerns that any amendments to the 2005 BBAP set a dangerous precedent for future area plans. The original 2005 BBAP struck an appropriate balance between various stakeholder interests and any proposed amendments are not necessary and will negatively impact responsible economical development.

Thank you for your time and consideration.

Comment 335 of 497 - submitted on 05/06/2013 at 12:00 AM:

On behalf of my clients, I am submitting a copy of the Citizens' Alternative BBAP as comments regarding DNR's proposed amendments to the 2005 BBAP. I'll highlight two categories of differences between the Citizens' Alternative and DNR's proposed amendments.

First, the Citizen's Alternative quantifies many habitat characteristics for each of the larger planning unit, i.e., those other than public use sites. To do so, we GIS mapped much of the data to quantify habitat types and then overlaid the planning units. This allows us to state, for example, the length of anadromous streams in each unit or the percentage of a unit that corresponds to moose wintering habitat, moose calving habitat, caribou wintering habitat, etc. Doing so increases consistency by designating similar habitats similarly across planning units. For example, DNR's proposals would designate moose wintering areas in the Nushagak drainage as habitat along the Mulchatna River, but would not do in the Kvichak drainage along Upper Talarik Creek. Our approach eliminates this inconsistency. Our approach reduces the risk

that designations appear arbitrary. Our approach results in co-designations of most land as habitat or subsistence/harvest, public recreation land and water resources land.

Second, the Citizens' Alternative employs more detailed area-wide guidelines in order to be more protective of habitat, fisheries, subsistence, recreation and other public values. Chiefly, we put more emphasis on (1) requiring that development be compatible with habitat and public uses of fish and game, and (2) requiring higher evidentiary standards for decision-making, such as that a decision be supported by clear and convincing evidence.

My clients and I appreciate that staff of DNR and the Governor's Office have been receptive to additional changes to the BBAP. We will work with you throughout the process.

Sincerely

Comment 336 of 497 - submitted on 03/19/2013 at 12:00 AM:

Re: Notice for DNR's public meetings on proposed amendments to 2005 BBAP.

I appreciate that DNR has extended the comment period until May 6, 2013 on its proposed amendments to the 2005 Bristol Bay Area Plan (BBAP). However, DNR's notice of the public meetings is too short to afford meaningful public participation as required by AS 38.04.065. Last week, DNR announced that it would hold a meeting on March 25 in Dillingham. Yesterday, at our meeting, DNR informed us that it was trying to arrange additional meetings. Today, we learned that DNR is arranging meetings in Newhalen on March 24, Igiugig and King Salmon on March 25, and Port Heiden and Dillingham on March 26, and from our phone conversation today that the places of such meetings are still being established.

This amounts to only a few days notice of the meetings and reflects insufficient effort to provide for meaningful public participation, particularly given that the comment period is now extended. DNR should take advantage of that extension of time.

DNR should also hold meetings in more of the communities represented by the six tribes which sued DNR over the 2005 BBAP. Dillingham is the only such community scheduled for a meeting. We recommended yesterday that DNR have a meeting in each of the plaintiffs' villages, and that if that is not possible, then DNR should consider alternatives such as a meeting in an up-river village in the Nushagak drainage, and in Nondalton because it so close to the Pebble deposit and was the lead plaintiff on the litigation.

I urge you to reconsider whether DNR is, or is not, providing meaningful public participation when DNR gives only a few days notice of public meetings.

Sincerely yours

Comment 337 of 497 - submitted on 03/18/2013 at 12:00 AM:

Re: (1) Request for Extension of Comment Period on DNR's Proposed Amendments to 2005 Bristol Bay Area Plan, and (2) Preliminary draft of the Citizens' Alternative Bristol Bay Area Plan.

On behalf of the tribal councils of Nondalton, Koliganek, New Stuyahok, Ekwok, Curyung and Levelock, and the Alaska Independent Fishermen's Marketing Association and Trout Unlimited, I am requesting an extension of the comment period, for at least 30 days, regarding DNR's proposed amendments to the 2005 Bristol Bay Area Plan ("BBAP"). The comment period currently ends April 4, 2013. DNR has yet to schedule public meetings on its proposed amendments. My clients, others, and I are also preparing a Citizen's Alternative BBAP.

Please consider the enclosed preliminary draft of the Citizens' Alternative. This cover letter and the preliminary draft commence our comments on DNR's proposed amendments. Absent an extension, we will submit the formal draft Citizens' Alternative with further comments on or before April 4, 2013. The purpose of this preliminary draft is to promote meaningful public participation and dialog with DNR, and to inform DNR of our efforts.

We encourage DNR to use our draft and DNR's proposed amendments as a basis for meaningful public participation and for a better plan. Toward those ends, we have held regional scoping meetings for a Citizens' Alternative. After gathering further public input, my clients intend to finalize the Citizens' Alternative over the next several months.

A draft Citizens' Alternative is an unusual "public comment," but, nevertheless, a comment my clients felt is necessary because neither the 2005 plan nor DNR's proposed amendments go far enough to adequately address the vision the vast majority of local residents have for the Bristol Bay drainages.

The Citizens' Alternative BBAP revises Chapters 1, 2, and 4, the Appendices of the 2005 BBAP, and the text and allocation tables of Chapter 3 for Regions 5, 6, 7, 8, 9, and 10, which include the Kvichak and Nushagak drainages. Most of our focus has been on the area-wide guidelines in Chapter 2 and the Kvichak and Nushagak drainages in Chapter 3. If tribes and residents of other regions in the Bristol Bay area want us to suggest revisions for their regions, then we will do so.

The Citizens' Alternative offers a new and better plan. It rests upon these core principles.

1. The Citizens' Alternative relies on science and the spatial application of resource data generated by the State to designate primary uses on State lands and to improve public awareness and participation.

The Citizens' Alternative contains GIS maps depicting essential and important habitats, and subsistence and sport hunting and fishing use areas, derived from data generated by ADF&G, DNR and other sources. By overlaying the unit boundaries, we computed the percentage of a given unit that supports a particular type of habitat, or level of public use. We then used this information for three purposes: (1) to designate primary uses, (2) to inform DNR adjudicators and the public about the resources and uses that should be considered within the particular units during future decision-making processes, and (3) to improve the unit-specific statements of management intent and the unit-specific inventories of resources and uses.

In contrast, DNR's 2005 BBAP did not contain a single map of any habitat type or subsistence or recreation use areas. DNR's 2013 proposed amendments contain only one habitat map, and it is for moose. The lack of such maps departs from the previous 1984 BBAP, frustrates meaningful public participation given the data available, and leads to inconsistent results. For example, DNR proposes to designate some moose wintering areas as habitat, but not those areas near Pebble in the Upper Talarik Creek. Our reliance on ADF&G's data and maps avoids inconsistent, subjective judgments that lack foundation in the record and appear to be arbitrary.

Unlike DNR's approach, the draft Citizens' Alternative justifies each designated use and corresponding classification using maps generated from publicly available data from DNR and ADF&G to avoid confusion and fully inform the public. DNR would be wise to adopt this approach. To do otherwise, hinders management decisions and frustrates the public process.

2. The Citizens' Alternative is consistent with the vision statement of the Bristol Bay Visioning Project and the history of state, federal, local and tribal efforts to balance conservation and development in the Bristol Bay drainages.

The Citizens' Alternative implements the vision statement adopted by the Bristol Bay Visioning Project. The Visioning Project was a multi-year scoping project sponsored by Bristol Bay Native Association, Bristol Bay Native Corporation, Bristol Bay Economic Development Corporation, Bristol Bay Housing Authority, and Bristol Bay Area Health Corporation. See <http://www.bristolbayvision.org>. The Visioning Project convened meetings in every village of the region and gathered detailed input from the people of each village on a variety of issues. The Visioning Project clearly showed that the vast majority of the people living in Bristol Bay seek:

- To protect subsistence;
- To protect salmon, other fish, wildlife, water and renewable resources;
- To protect and encourage a local economy based upon renewable resources; and
- To allow non-renewable resource development that doesn't threaten the above.

The Citizens' Alternative is also consistent with past state, federal, local and tribal efforts to balance conservation and development in the Bristol Bay drainages and to conserve the Kvichak and Nushagak drainages in particular. Historically, the State pursued many efforts and actions, from 1967 to 2005, to foster conservation of the Kvichak and Nushagak drainages including acquiring the lands at the Pebble deposit, not by selection under the Statehood Act, but by land exchange in order to protect fish.

3. The Citizens' Alternative improves area-wide management guidelines.

The Citizens' Alternative significantly revises the area-wide guidelines in Chapter 2 to ensure that habitat, recreation, and subsistence are protected. These revisions include:

- Reinstating the area-wide instream flow protection for fish from the 1984 Plan;

- Incorporating the use of the "precautionary principle" when making any land use decisions that may significantly impact salmon;
- Establishing a presumption that all waters in the Bristol Bay region are anadromous;
- Prohibiting metallic sulfide mining in the Nushagak and Kvichak watersheds;
- Encouraging voluntary cooperative land use planning among major landowners;
- Reinstating the Bristol Bay Advisory Board to review and recommend plan changes; and
- Adopting a new mineral closing order to ban new mining claims on or along cataloged anadromous streams potentially threatened by mining.

Please review carefully this preliminary document. We look forward to talking with you regarding DNR's proposed amendments and the Citizens' Alternative BBAP.

Sincerely Yours

Comment 338 of 497 - submitted on 05/01/2013 at 02:27 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and proposed amendments. I would recommend the State consider a broaden approach to the Bristol Bay Area Plan. The State's Plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support the established multi-million dollar segment of the Bristol Bay's local economy. The Citizens Alternative includes many reasons why I visit and fish in the Bristol Bay.

Comment 339 of 497 - submitted on 05/01/2013 at 04:25 PM:

To whom it may concern.

I'm writing this comment to the Alaska Department of Natural Resources to formally state that the 2012 amendment to the 2005 Bristol Bay Area Plan does not adequately identify the true value of the state owned lands in and around Bristol Bay. The 1984 Bristol Bay Area Plan accurately identified state owned lands in and around Bristol Bay as significantly important for hunting, fishing, and recreation. The 2005 Bristol Bay Area Plan was a poorly disguised complete giveaway of the area at the Pebble deposit to foreign mining interests. Mining at the headwaters of the Kuktuli and Upper Talarik creeks directly threatens the Nushagak and Kvichak rivers as well as Lake Iliamna. Mining is not compatible with sport, commercial or subsistence fishing in Bristol Bay.

I would like to see the Department of Natural Resources adopt the recently drafted Citizens Bristol Bay Area Plan. In the very least the Alaska Department of Natural resources should consider implementing the following list of priorities in their amendment to the 2005 Bristol Bay Area Plan:

1. Establish a subsistence land classification category.
2. Classify all anadromous waters as habitat regardless of navigability.
3. Increase habitat classifications for fish and wildlife.
4. Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
5. Establish a new mineral closing order banning new mining claims on or along salmon spawning streams threatened by mining.
6. Engage in voluntary cooperative planning with all of the stake holders of Bristol Bay regarding any future reclassifications of the lands there.
7. Restore water level protections for fish to their original status under the 1984 plan such that we automatically reserve water for fish in Bristol Bay. If you want to take water out, you must prove no harm to fish.
8. Create a Bristol Bay advisory board comprised of stake holders in the commercial, sport, and subsistence fisheries, and other vested parties.
9. Implement the precautionary principles as they were adopted by the state board of fisheries wherein we err on the side of caution when we are uncertain of the outcome of our actions regarding development of lands surrounding salmon habitat.
10. Operate under the presumption that all waters in the Bristol Bay are important to salmon until proven otherwise.

Thank for your time in considering my recommendations regarding the use of state lands in Bristol Bay.

Sincerely yours,

Crawford Parr.

Comment 340 of 497 - submitted on 05/05/2013 at 09:37 AM:

Local Bristol Bay Native organizations and fishing groups have cooperated in creating a Citizens Alternative Bristol Bay Area Plan to ensure sustainable management of the region's resources. I support this plan.

Comment 341 of 497 - submitted on 05/07/2013 at 10:10 PM:

Growing up in Alaska taught me that wildlife are the backbone of Alaska, especially the salmon that are famous throughout the world. Damaging the habitats of salmon not only hurts the lives of the people that rely on subsistence to survive, but in effect damages the Alaskan economy as salmon is one of the biggest exports of the state. Even if the salmon keep living the taste may not be as great, and could end up damaging the reputation of Alaskan salmon as one of the best tasting fish in the world. I'm proud to be an Alaskan, and want to continue to tell my friends that Alaskan seafood can't be beat.

Comment 342 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 343 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
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- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 344 of 497 - submitted on 03/15/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
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- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

P.S. I was involved with the 1984 Plan when DNR came to New Stuyahok. We classified where we get our fish & game also prioritized which lands we use.

To this day we still use the areas that were classified in 1984.

Comment 345 of 497 - submitted on 05/03/2013 at 05:40 PM:

It is my strong and humble opinion that the Bristol Bay watershed is unique and vitally important to all the citizens of Alaska and that its habitat designation must be one that ensures the region is properly valued and managed correctly. This wild salmon fishery provides food to people around Alaska and the world, as well as economic and cultural benefits for millions of people. I implore you to support the Citizens Alternative and uphold the wishes of the local tribes, commercial and sport-fishing organizations to carefully prioritize Bristol Bay's sustainable resources. All of this magnificent bounty can be so easily destroyed by improper management and a large scale mine operation. I hope the State of Alaska does the right thing here and ensures that Bristol Bay remains a fully intact ecosystem that supports the life and health of the region, the state, and beyond. Thank you for the opportunity to comment on this extremely important issue.

Comment 346 of 497 - submitted on 05/01/2013 at 12:00 AM:

As an Alaskan resident I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.

- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Sincerely

Comment 347 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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Sincerely

Comment 348 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

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Comment 350 of 497 - submitted on 05/01/2013 at 08:10 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on protecting the rivers, lakes and other environmentally sensitive resources that are located along Bristol Bay. Speaking as a state resident who has firsthand experience in monitoring the environmental impacts of historic/current mining operations on sensitive resources (such as rivers, soils, wildlife -fish especially- and heritage sites), I feel that there is no way for the State to avoid negative impacts within the area of potential affect. The local economy of Bristol Bay and future generations of Alaskans and visitors will benefit much more if these resources stay unpolluted, preserved, and available to the public. Such actions will allow future generations to experience the land as we were able to experience it in this day and age. A review of the Citizen's Alternative includes a multitude of the reasons why I value the Bristol Bay area.

Comment 351 of 497 - submitted on 02/12/2013 at 12:00 AM:

The 2005 BBAP was a crude attempt by DNR at disenfranchising the people of the Bristol Bay region and their way of life. The following comments are what I consider important to restore land classifications to allow the continued traditional use of our area.

Bristol Bay is a world-renowned gem teeming with the largest wild sockeye salmon population in the world. To protect this we must establish that all waters are anadromous in Bristol Bay. Furthermore, DNR should use the "precautionary principle", established by ADFG Board of Fish: If you don't know what the outcomes your actions might have, error on the side of caution.

Subsistence is necessary in the bush to allow the people to provide for their families. Subsistence as a criteria for land use planning is a must. Subsistence allows locals to subsidize their food requirements with local game saving their cash income to pay for necessities such as heating fuel, gas, and utilities.

Habitat for big game is essential. All the tributaries on the Kvichak River provide wintering moose habitat. Mulchatna Caribou move from their calving area north of Iliamna Lake and west of Lake Clark to the southwest in the winter, nearer the coast, where there is less snow, allowing easier feeding. When the caribou cross the Kvichak it allows the people of Unit 9C an opportunity to hunt, when a special registration hunt is opened by ADFG. This is our only opportunity to hunt caribou at present.

Aside from these comments I support the Bristol Bay Area Plan Citizen's Alternative that will be given to DNR as a comment.

Thank you for the opportunity to comment and please keep Bristol Bay clean and wild.

Yours in good fishing

Comment 352 of 497 - submitted on 05/02/2013 at 08:25 PM:

Please consider carefully what recourses we have to recoup our loss of the native salmon once the Pebble mine partnership has taken our minerals, made millions of dollars, raped the land and left us with a huge slag heap, that will for centuries leech pollutants out into the waterways of Bristol Bay. Look how long it took for Exxon to pay pennies on the dollar to the folks in Valdez that lost their way of life and their livelihoods. After they have made their money they don't care about the "little people", and then they are long gone, with nary a backward glance. Tell them to go dig up Canada and leave our land alone.

Comment 353 of 497 - submitted on 05/02/2013 at 12:00 AM:

The 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments are not necessary. Furthermore, the revisions set a dangerous precedent for future area plans.

Thank you for taking my comments

Comment 354 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 355 of 497 - submitted on 05/03/2013 at 01:08 PM:

Re: Bristol Bay Area Plan

Alaska's resources are to be developed and utilized by and for the benefit of the people of the state. This means various uses should all have a seat at the "how-to" table.

Please reject any attempt to transfer our ownership property rights to narrow self interest groups to the detriment of other uses.

thank you.

Comment 356 of 497 - submitted on 05/03/2013 at 12:00 AM:

I CARE ABOUT THE FUTURE OF TRISTOL BAY'S FISH AND FAMILIES. PLEASE, PROTECT THEM!

An outside mining project with so many unknown and irreversable impacts on such a complex and economically important resorce to both Alaska and the rest of the world's salmon consumers is too important to give away to Pebble Partnership. Consider the consequences for our state and its people.

Thank you.

Comment 357 of 497 - submitted on 05/02/2013 at 12:00 AM:

It is of great importance that Alaska's Department of Natural Resources adopt the Citizen's Alternative for Bristol Bay.

Sincerely

Comment 358 of 497 - submitted on 05/02/2013 at 10:06 AM:

It is clear when looking at the 1984 Bristol Bay Area Plan, and the 2005 version that the revisions to the designation of vast areas of State Land as being of "General Use" constitute a dramatic change in what's possible for development.

I emphatically urge the State of Alaska to adopt the Citizens Alternative Plan because it takes into account the complexity of the situation as it relates to land and water use, and it's relationship to the habitat of of wildlife and the residents of the region.

It's against common sense and against meaningful science when such a hugely complex and abundant area such as the Bristol Bay region is divided up in an arbitrary way, such as the previous mapping suggests.

We live in an age when all of the world is struggling with Man's need for resources and energy. Bristol Bay is a chance to take a new approach for the future that values what is responsible and intelligent use of a pristine and vastly abundant area, an approach that says we find sustainable use more valuable than short term profits with long-term negative consequences.

Thank you.

Tyone Raymond

Comment 359 of 497 - submitted on 05/03/2013 at 09:43 AM:

I support the citizen's alternative for the BBAP; it will embrace residents concerns for how this area shouldbe managed

Comment 360 of 497 - submitted on 03/29/2013 at 12:00 AM:

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Sincerely

Comment 361 of 497 - submitted on 04/04/2013 at 12:00 AM:

I would like to submit the following comments on the Bristol Bay Area Management Plan for consideration in resource planning for our region.

1. Fish and wildlife (especially sockeye salmon) are essential components of the ecosystem, economy and culture of the region and have significance to the state and nation. Additionally, the food security of some of our upriver (non-coastal) villages is dependent on strong salmon runs. Habitat classifications that protect fish and wildlife should be the most important component of the plan.
2. All waters that drain into 6 mile, Iliamna Lake, and the Kvichak River should be designated for habitat and subsistence in order to protect the salmon runs, culture of local people, and food security of the region.
3. Subsistence classifications should be designated in important subsistence resource locations. Collaborative planning with local subsistence users to identify those regions (which will be large) should be undertaken and subsistence classifications designated. Large portions of the landscape should have subsistence priority.
4. Reestablish the system used in the 1984 plan that automatically reserved water for fish and required that no harm to fish be proven before water is taken from streams.

5. Establish a new Mineral Closing Order that would ban new mining claims on or along salmon spawning grounds or streams.
6. Prohibit metallic sulfide mines in the Nushagak and Kvichak watersheds in particular but would probably be a good idea in all five of the Bristol Bay river systems. The salmon runs are too important to expose to known risks. Ban it.
7. Implement the precautionary principle when making land management decisions in the same way it was adopted by the Alaska Board of Fisheries. Err on the side of caution.
8. Make decisions that assume that all waters in Bristol Bay are needed for salmon unless proven otherwise.
9. Designate all portions of the upper Chulitna watershed for habitat, subsistence and recreation. The lower portion of this watershed is protected by Lake Clark National Park. The upper portion needs to be protected. This watershed is a subsistence "bread basket" and needs to be wholly protected. Additionally it drains into Lake Clark, 6 Mile Lake, and Iliamna Lake which means the water quality and quantity is essential to down stream habitat quality.
10. Use voluntary cooperative planning.

The priorities of the Bristol Bay Area Management plan should be to protect the health of the environment and the culture of the people who live here. Habitat and subsistence classifications should take priority over anything else.

Thank you for your consideration

Comment 362 of 497 - submitted on 05/02/2013 at 12:53 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. There has also been very little information on the impact of long term mining on the salmon and environment. The Citizen's Alternative includes a much more reasonable plan and is considerable more comprehensive. I enjoy Alaska and I would like my children and my grandchildren to be able to enjoy Alaska including Bristol Bay.

Comment 363 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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Comment 364 of 497 - submitted on 05/06/2013 at 12:00 AM:

Testimony about the Bristol Bay Area Plan by the Department of Natural Resources of to the state of Alaska and the United States of America 29 April 2013

My name is Adolph J. Roehl, Sr. I was born August 30, 1939 in Dillingham, Alaska to Henry, Sr. and Alma Roehl, both Indigenous Persons of Alaska. Although I have been a Member Chief of the Curyung Tribal Council of Dillingham for 17 years, my testimony will be as a private individual.

Under the United Nation's Charter and international human rights law of which the United States of America is signatory, the Traditional-Use-Subsistence resource rights of Alaska's Indigenous People must be protected. The denial and destruction of Alaska's Indigenous Peoples' Right to subsistence also includes the denial to protect our environment and habitat to sustain the subsistence resource on our territory, land, lakes and submerged lands. The destruction of the salmon spawning and rearing streams must be considered as a "Crime Against Humanity" and an act "with the intent to destroy in whole or in part" the Indigenous Peoples of Alaska under the United Nations Genocide Convention and United States P.L. 100-606 □ November 4, 1988 102 Statute 3045.

As an International Lawyer explained it: Any person who has knowledge of Acts of Genocide is equally guilty of Crimes against Humanity.

The United States of America and its political subdivisions have not acquired title and jurisdiction to Alaska and is acting as a State under occupation of the Indigenous Peoples of Alaska.

This testimonial has already been forwarded too Professor James Anaya, Special Rapporteur on Indigenous Issues appointed by the Human Rights Council and to the Independent Expert of a Democratic and Equitable International Order and to other United Nations Special Procedures and bodies and to Ambassador Ronald Barnes. I am submitting United Nations Shadow Reports and complaints for you information.

Sincerely

3 Attachments: 1. IPNC Koani Submission JS6-Joint submission 6; 2. IPNC2006 HRC Shadow Report CERD Submission; 3. CERD Alaska 2008 Shadow Report

Comment 365 of 497 - submitted on 05/07/2013 at 11:25 PM:

Bristol Bay is a place like no other. It has to be protected by Alaska. This needs to be a wake up call for us. The Pebble Mine is truly a disgusting idea. Protect Bristol Bay for food, hunting, fishing, hiking, camping, and just enjoying in it's pristine state. That is becoming the rarest commodity on our planet. Failure to protect this pristine resource from this psychopathic development proposal is failure to recognize it's true value. Save our salmon! NO Pebble Mine! You came to Alaska for the "Bristol Bays," now get real and protect them.

Comment 366 of 497 - submitted on 05/06/2013 at 05:51 PM:

Dear SOA DNR I am a college student writing this letter during my semester finals week to express my concern regarding my home of Bristol Bay. The 2005 Bristol Bay plan is flawed. Bristol Bay should be classified as primary land for fish and wildlife habitat. This will ensure protection of sport, commercial, and subsistence fishing. Bristol Bay doesn't need any mineral mines. If the state allows one mine in Bristol Bay it will blaze a path for other mines in the region to open. I don't know why the state would consider having mineral extraction as a source of state income. Especially from a untouched wilderness such as Bristol Bay. Mineral extraction gets around 2.5% of revenue that goes to the state. Alaska oil gives the state around 30% of its revenue. It is simple math, the state will get ripped off and will have to deal with

perpetual waste forever. Please allocate the land in the best interest of residents, fishermen, hunters, subsistence users, and the state. Please don't allocate land in the best interest of foreign mining companies.

Comment 367 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 371 of 497 - submitted on 04/30/2013 at 06:34 AM:

As a concerned citizen and resident of Alaska I feel compelled to express my opinion regarding Pebble Mine and Bristol Bay. We must value the fishery over the mine because fishing is (potentially) forever while mining lasts only until the resource is depleted. The mine may safely store its wastes for months, years, or decades, but it would only take one major spill to destroy the Bristol Bay fishery. Please take the longer view on this.

Comment 372 of 497 - submitted on 05/01/2013 at 12:00 AM:

RESOLUTION NO. 2013-20

A RESOLUTION OF THE DILLINGHAM CITY COUNCIL APPROVING TO SUPPORT THE CITIZEN'S ALTERNATIVE BRISTOL BAY AREA PLAN

WHEREAS, City of Dillingham (COD) is a 1st class City serving its residents of the community of Dillingham; and

WHEREAS, COD has the authority to establish relationships and enter into contracts; and

WHEREAS, COD, tribes, sportsmen, and commercial fishermen have made every attempt to work with the State regarding our concerns. DNR did no consultation with Bristol Bay residents, tribes, local governments, commercial fishing groups, or others before drafting the proposed changes to the plan; and

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, after settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat-

- (1) 64 Streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Kaktuli River, the Upper Talarik River, and eight streams to south of Pebble block;
- (2) Navigable anadromous waters in their entirety, including the South Fork of the Kaktuli River to Frying Pan Lake;
- (3) Moose calving and some wintering areas to include the North and South Forks of the Kaktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) The Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, the Department of Natural Resources has-

- (1) Declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) Declined to classify non-navigable anadromous waters as habitat;
- (3) Declined to classify much of the moose wintering areas as habitat;
- (4) Declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, the COD expects that the Department of Natural Resources will incorporate the other considerations of the COD in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category;
- (2) Classify as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not;
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvichak drainages;
- (4) Increasing Habitat Classifications for wildlife and fish;
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages;
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining;
- (7) Encouraging Voluntary Cooperative Planning;

- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish;
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages;
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution";
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW, THEREFORE, BE IT RESOLVED that the COD requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the COD supports the Citizen's Alternative Draft Bristol Bay Area Plan.

Passed and adopted by a duly instituted quorum of the Dillingham City Council this 25 day of April, 2013.

Comment 373 of 497 - submitted on 04/30/2013 at 04:20 PM:

I am in support of the Citizens' Alternative Plan for management of the Bristol Bay watershed area. It is my belief that State and Federal resource management agencies should manage resources with the objective to protect the lands, waters, fish, and wildlife from any development that could cause a loss of any of these natural resources. Agencies should be protecting the resources for use by future generations. Despite misguided agency objectives changes proposed by the Governor, agencies should not be doing the private sector's role in development proposals. It is the private sector's role to prove that their proposed development will not harm the natural resources of the development area and the agencies should ensure that the resources will not be harmed. Protect the resources of Alaska for your children and grandchildren rather than sacrificing the resources for current jobs.

Comment 374 of 497 - submitted on 04/01/2013 at 12:00 AM:

The time approaches for commenting on the revised Bristol Bay Area Management Plan. The enclosed are my comments as a 43-year resident of the Bristol Bay area ... with extensive experience in the biological resources of the area.

I helped with the development of the "1984 Plan" that was based on numerous "Public" drafting meetings in the Bristol Bay area villages (and elsewhere in the state), and was submitted, and accepted as our Bristol Bay Management Plan ... until an arbitrary decision was made behind closed doors by the top administrators of DNR ... without the Bristol Bay public's involvement ... to scrap the plan in favor of something more favorable to the mining industry. The result of that decision is extremely objectionable to many of us that reside in the Bristol Bay area. My recommendation to you is to return to and re-adopt the original plan we devised and submitted in 1984. If the DNR personnel cannot find suitable mechanisms to work within our original framework ... then its time to get some new personnel at DNR. We specified Fish & Wildlife Habitat to be the prime function of most of the state land units in the Bristol Bay area. Its pretty damned hard to envision fish & wildlife (moose, bears, caribou, salmon, trout, whitefish, ptarmigan, aquatic insects, zooplankton, cranes, swans, hares, fur-bearers, etc) living, feeding, reproducing, raising young, or even migrating across or through open-pit mines, waste-rock dumps, detoxification settling-ponds, explosive materials storage areas, landfills, fenced-off areas, etc the types of land uses around mines. Its also hard to envision how local residents could subsist within the "security zones" that would be imposed around such mineral developments by the industrial developers of these sites. These types of activities should be restricted to an absolute minimum in the Bristol Bay area ... the world's largest remaining producer of wild sockeye salmon, one of the world's most favored areas for recreational angling for large native salmonids (primarily for its world-class native rainbow trout and salmon species), and an area still known for its mostly pristine lands and waters.

We already have ample evidence in the Bristol Bay area of the length of time necessary for local watersheds to recover from major environmental disruptions. The eruptions of Aniakchak volcano on the Alaska Peninsula about 3,000 years before present, the emption of the Mount Katrnai/Novarupta volcano in Katmai National Park in 1912, & the acid discharge from Chiginagak volcano in the King Salmon River drainage near Ugashik Bay in June 2005 have all given us direct examples of the recovery/recolonization time-lines that even natural serious ground and water contamination can present. Several fish species present in other areas on the Alaska Peninsula have still not returned naturally to the drainages around Aniakchak after 3,000 plus years. Ukak River in Katmai Park still lacks its salmon run and there is scant vegetation and very little wildlife in the Valley-of-10,000 Smokes 100 years after that eruptive event. The sulfuric acid that drained from the overflow of Chiginagak Volcano's crater lake caused the complete acidification of Mother Goose Lake and the death of all the resident zooplankton in the lake. The chinook salmon, chum salmon, sockeye salmon, & sea-

run Dolly Varden backed out of King Salmon River (the outlet stream from Mother Goose Lake) during the acid event and have only begun to recover a bit in the years since. These are some of the kinds of natural events that the local native peoples refer to when they stress how important subsistence is and has been to their way of survival in the Bristol Bay region. When these types of disruptions have occurred in the past people have had to rely on other nearby lands and waters (ie the nearby Fish & Wildlife Habitat) to provide food, shelter, and the natural materials necessary for survival...or they had to either move away or perish. In their oral histories they pay particular attention to surviving "the starvation times". It was very important to those of us working on the original 1984 Plan to emphasize protecting the Fish & Wildlife Habitat throughout nearly the entire area in recognition of the fact that in the future we may have to depend even more dearly than usual on it at some point in response to another eruption, cold period, acid-rain event, or other major environmental reason. We did not make that designation lightly! Many of the local native "elders" whose insight and advice were especially meaningful in those decisions have now passed away ... their insights are no longer available to those who have scrapped or would revise the carefully crafted 1984 Plan. Those of us who survive them do not wish to see their wisdom scrapped in favor of mineral interests or DNR's bureaucratic expediency.

In Summary, again I am advocating a return to the publically vetted 1984 Bristol Bay Area Management Plan over the administratively gutted pro-mineral development version ... and Only As A Last Resort should any industrial-scale mineral development occur on the State lands feeding the Bristol Bay watersheds. If there is some rare mineral available locally that is in such scarcity worldwide that it is absolutely imperative that the last remnant of it be ripped from the lands or waters of the Bristol Bay State lands ... then please regulate that specific situation to the maximum ... keep its local impacts to the minimum ... and be done with it after cleaning up after its removal. Otherwise the State lands in the Bristol Bay watershed should be managed for Fish & Wildlife Habitat as the Number-1 priority ... and pristine naturally pure waters as the Number-2 priority. Ultimately, within just a few decades, our clean waters will be a far more valuable commodity to the world at large than all the extractable minerals from this area combined ... and I suspect we'll again have to figure out how to protect our fish & wildlife and their habitats from those that would seek to sell off our waters for short -term profits.

Sincerely

Comment 375 of 497 - submitted on 03/28/2013 at 12:00 AM:

I am writing to urge you to protect the habitat in and surrounding Bristol Bay. I find the 2005 changes to the Bristol Bay Area Plan to be hugely disappointing. And I thank you for being willing to consider changes. We need to assure that our short term needs, urgent as they might seem, do not override the long term needs of our children and our children's children and of the natural environment. Nothing is more important than food. Our desire to destroy habitat should be balanced carefully with the need to protect habitat for the use of those foodstocks. We are overfishing already. How can we even consider risking the habitat of the salmon? Many of our actions, even though well planned, have unintended consequences. Please be very careful and conservative.

Please restore habitat protection to the majority of the area around Bristol Bay. The requirement that a stream be navigable to be protected seems ridiculous. Protect even non navigable waters needed by salmon. Protect the areas needed by the moose and caribou for both calving and wintering. And

please, also, protect those areas that are needed by the native peoples that have been living in the area for hundreds of years without destroying their environment.

Please use caution.

Thank you.

Comment 376 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 378 of 497 - submitted on 05/06/2013 at 12:00 AM:

To whom it may concern;

Please take in to consideration my comment on the proposed Bristol Bay Management Plan.

I feel the proposed plan falls short, in the protections needed to maintain the WORLDS largest wild salmon runs. Please adopt the citizens plan, or at least put in the safeguards to maintain the natural sustainable resorses we rely on.

Thank you

Comment 379 of 497 - submitted on 04/30/2013 at 12:49 PM:

It is obvious that Bristol Bay citizens want a more balanced approach to their areas resources than your 2005 plan. Please balance the plan with consideration for fish, wildlife, and Alaska people other than mining. The 2005 was far too brazen in its lack of balance.

It is obvious too by the neutral science of the EPA that Pebble mining will destroy thousands of wetland acres and 100 miles of streams, and that is just one mine. Be a true state leader and balance our resources instead of pandering to one industry.

Comment 380 of 497 - submitted on 05/06/2013 at 04:29 PM:

It's with sincere concern out and my deepest fears that I gratefully request that the zone containing the Pebble Mine be reclassified as Land & Wildlife Habitat.

This area is no place to experiment with "new technology" for a mine. This is more than "subsistence", more than "Land & Wildlife Habitat", this is our Lifeblood!

Please, do anything you can to listen to the people. Please, do not let this area be developed for Mineral Use.

Sincere thanks,

Michael Santelli

Comment 381 of 497 - submitted on 05/06/2013 at 09:37 AM:

It is of great concern to me that the current plan has decreased the habitat classification so necessary for the survival of Salmon Habitat. The use classifications that promote mining and mineral exploration are in direct conflict with the land use designation of habitat, for not only salmon but all other species such as caribou, moose, birds and wild plants used for food.

I feel that the decrease in land use designations for recreation, and habitat over the years has not been decided with the publics best interests in mind. The decrease in habitat and the current proposed land use designations are promoting mining and mineral exploration on lands previously designated as habitat/recreation.

I am not in favor of the proposed changes in land use as set forth in the Bristol Bay Area Plan Amendment 2012. Please listen to the residents of Bristol Bay and the users of this land, not outside business interests.

Comment 382 of 497 - submitted on 05/07/2013 at 12:13 PM:

Please listen to the people of Bristol Bay. We are only here because we can live a subsistence lifestyle. If something happens and that is jeopardized there is no going back from it and many people will lose their way of life, and we would have to move because living off the land helps us afford to live here. Prices for everything are so high and we love it here. We love the fish, berries, and many other things we live off of. Please protect it from Pebble Mine and anything else that could jeopardize our way of life. Our Salmon are worth more than their weight in gold and once all the copper is gone it's gone but as long as we protect our Salmon they will continue to come back for millions of years to come.

Thank You

Heather Savo

Comment 383 of 497 - submitted on 05/03/2013 at 09:17 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I noticed the substantial decrease in Wildlife Habitat designation, a striking increase in Settlement designation, and found the transportation corridor to the proposed Pebble mine particularly appalling. I would recommend the State consider renaming this plan, the Bristol Bay Area Pebble Mine Facilitation Plan. I can see that Pebble and other mining entities must have an interest in the Nikabuna Lakes area, Pile River, Canyon Creek, Chekok Creek and Pope Vanoy areas. The State's plan ignores its own long term subsistence data and does not recognize the importance of the area for subsistence and for the survival of indigenous people. I urge you to show some sensitivity to the area's first people's needs, to the great recreational and non-mineral economic assets of the BBA.

Comment 384 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in a meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
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- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 385 of 497 - submitted on 05/04/2013 at 07:53 PM:

I would like to see the state place more emphasis on the recreational value of the region. In reviewing the 2005 plan I do not feel those interests are represented or protect at level that they are valued.

Thanks,

Todd S.

Comment 386 of 497 - submitted on 04/30/2013 at 07:54 AM:

I support the Citizen's Alternative.

I am absolutely opposed to the Bristol Bay mining project.

The consequences of such a project are far reaching...and impossible to plan for. The waste will be with us for centuries and is not safe. The mine is shortsighted.

Thank you for considering my comments.

Mrs. Doreen Schumacher

Comment 387 of 497 - submitted on 05/04/2013 at 07:02 PM:

I support the citizens alternative action plan that will ensure prioritizing sustainable resources in Bristol Bay. Thank you Katrina

Comment 388 of 497 - submitted on 04/28/2013 at 08:21 PM:

As a longtime visitor to the bristol bay region, I see the specialness that the area offers. I have used much of the area for recreation. I have floated the mulchatna, tikchik lake system, and fished many of the rivers that flow into lake illiamna.

I wholeheartedly support the "Citizens Alternative Bristol Bay Area Plan" and was appalled when the State of Alaska forced their pro-mining plan down our throats in 2005.

I have been a resident of Alaska for 47 years and am here to enjoy the beauty and tranquility of our beautiful state.

Thank you.

Comment 389 of 497 - submitted on 05/06/2013 at 12:00 AM:

Our committee recently met, after many of us had attended at least one of the informational meetings held by DNR to explain the revised Bristol Bay Area Plan, and would like to offer our input.

As you are well aware the Bristol Bay area is not only large but also very diverse with all of resources, including our people, dependent on each other for sustainability.

We strongly urge DNR to incorporate the following into the 2013 Bristol Bay Area Plan to help not only allow development but also allow our culture, residents and habitat to be sustainable:

Incorporate ALL of the streams identified, through the DNA samples pulled, in the 2013 WASSIP study that having spawning populations of salmon. We were very distressed to not see a full accounting of those very important streams included in the revised plan. Our strong salmon runs depend not only on the multitude but also diversity of these streams to be a sustainable fishery, as it is known world wide,

Include information on our native high value fish populations such as lake Trout, Steelhead, Grayling and Shee. These fish populations are vital to both our economy and villages sustainability. Not including these fish population, which can be supplied via the ADF&G, guides and villagers, is a vast oversight and does not show the diversity of the bay.

Although subsistence hunting and gathering is allowed even with the 'new' plan it is not specifically protected which we feel is a gross oversight by this revision. We strongly urge that the majority of the areas suggested in the Citizen's Alternative Bristol Bay Area Plan be included in the revision.

We understand this does encumber those lands and make it almost impossible for some uses but without it our entire region and way of life is threatened. The lands to be incorporated in the Habitat classification should be determined with specific input from boroughs, villages, the wide variety of users and the science that determines area critical for both our animal and fish populations to remain sustainable. Areas where possible future activities, such as energy development and agriculture need to be taken into consideration, but not at the cost of destroying fish and animal habitat.

We also strongly support voluntary community involvement in any plan revisions and updates, done both now and in the future.

In closing we ask the DNR to realize we are pragmatic enough to know that future development does need to happen for our coming generations but not at the expense of destroying the resources we have now that sustain our villages, residents and businesses.

Respectfully

Comment 390 of 497 - submitted on 05/06/2013 at 12:00 AM:

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- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 392 of 497 - submitted on 05/01/2013 at 12:00 AM:

Cook Inletkeeper is a community-based non-profit organization that works to protect salmon and water resources throughout the Cook Inlet watershed and beyond. On behalf of our more than 1200 members and supporters in southcentral Alaska, please accept these comments on the State of Alaska's revisions to the 2005 Bristol Bay Area Plan (BBAP).

Revisions to the BBAP released in early 2013 fail to provide adequate protection for Bristol Bay's incredible renewable resources or for the people who use and rely on them.

As a result, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.

- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan.

Thank you and please do not hesitate to contact me with questions.

Very truly yours

Comment 393 of 497 - submitted on 05/01/2013 at 12:00 PM:

Dear Sir: I am an annual Alaska visitor (fishing) and always enjoy it's unique fish and wildlife resources. I spend a lot of money there.

After my review of the 2005 Bristol Bay Plan, I couldn't help thinking of the constant pressure on our irreplaceable natural resources for the benefit of short term mining, drilling, etc. interests. Please consider what has happened to so much of our natural environment, perhaps the reason I feel the need to come all the way to Alaska from Tennessee, when you contemplate issuing permits for this mining. I would think the best long term interest of Alaska would be to protect these unique fish and wildlife resources and resist those who lobby to take one-time resources at the expense of our sustainable resources.

Thank you for considering this view. Dan Sherry

Comment 394 of 497 - submitted on 05/02/2013 at 09:11 AM:

To the Great State of Alaska's Representatives,

I have lived in Alaska all my life, commercial fished, worked in the oil field and love to sport fish. I have no problem with responsible development of resources. I believe insurances and penalties for failure of safe development and accidents should be large enough to repair the environment and all harmed. I believe insurance policies should be in place and 100% legally binding on corporations and individual alike. If in the end, there is no one that can be blamed, the state and individual persons employed for the oversight be held liable. It is time for accountability, we do not need or deserve another Exxon Valdez. I believe as we lose our houses, so should all those responsible, whether state employee, citizen of a different state or country, I believe they should all be held accountable on a business, professional and personal level.

Thank you,

Glen Shier

Comment 395 of 497 - submitted on 05/05/2013 at 12:00 AM:

The risks are far to great for Pebble's detrimental project. PLEASE do not allow Pebble to proceed!!!!

Comment 396 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. During the 2005 BBAP revision process, Alaskans were concerned that DNR did not adequately consult with Bristol Bay residents, tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Citizen's Alternative Bristol Bay Area Plan (CABBAP), submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the CABBAP recommends D.N.R. to include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution.
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.
- Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan.

Sincerely,

6 signature pages attached.

Comment 397 of 497 - submitted on 03/18/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the AK-DNR failed to consult in a meaningful way with the people of Alaska during the 2005 B.B.A.P revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral closing order that would ban new mining claims on a or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.

- Create a Bristol Bay Advisory Board made up of local residents.
- Implement the precautionary principle when making and management decisions as it was originally adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.

Subsistence is the heartbeat of our culture in Bristol Bay and Bristol Bay Area plan needs to include subsistence as criteria or land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area plan into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 398 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstones of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 399 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 400 of 497 - submitted on 05/02/2013 at 07:48 PM:

Re: Bristol Bay Area Plan Amendment

The Citizens' Alternative improves area-wide management guidelines.

The Citizens' Alternative significantly revises the area-wide guidelines to ensure that habitat, recreation, and subsistence are protected. Some of the revisions are:

an automatic instream flow protection for salmon

use of the precautionary principle when making any land use decisions that may significantly impact salmon

a presumption that all waters in the Bristol Bay region are anadromous

prohibition of metallic sulfide mining in the Nushagak and Kvichak watersheds

a new mineral closing order that would ban new mining claims on or along salmon spawning streams potentially threatened by mining

Comment 401 of 497 - submitted on 04/30/2013 at 09:32 AM:

I believe that mining interests should be a much lower priority than citizen and environmental interests. I support the Citizen's Alternative Bristol Bay Area Plan.

Comment 402 of 497 - submitted on 05/02/2013 at 12:00 AM:

I am a longtime Alaska resident and commercial gillnetter. I am writing you today to support the Citizens Alternative Bristol Bay Area Plan. I don't believe the 2013 revisions to the 2005 BBAP go far enough in protecting the incredibly productive and sustainable fisheries resource that is Bristol Bay. Let's not underestimate the true value of this area for all Alaskans, and for that matter, the rest of the world!!

Sincerely

Comment 403 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in a meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 404 of 497 - submitted on 04/19/2013 at 12:00 AM:

Resolution 13-12

A Resolution requesting that the Department of Natural Resources incorporate all matters specified below into its 2013 Revised Bristol Bay Area Plan, and supporting the Citizen's Alternative Bristol Bay Area Plan, and requesting public meetings and hearings.

WHEREAS, The City Council of the City of Aleknagik is the political subdivision of the State of Alaska and local governing body serving its resident members of the community of Aleknagik; and

WHEREAS, The City Council of the City of Aleknagik, acting as the duly elected governing body pursuant to the State of Alaska Title 29 and its cities municipal code, has the authority to establish relationships and enter into contracts; and

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat -

- (1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Koktuli River, the Upper Talarik River, and eight streams to south of Pebble block,
- (2) navigable anadromous waters in their entirety, including the South Fork of the Koktuli River to Frying Pan Lake;
- (3) moose calving and some wintering areas to include the North and South Forks of the Koktuli west of Pebble block;
- (4) Western Iliamna Lake which is downstream from the Pebble deposit; and
- (5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has -

- (1) declined to establish a Subsistence land classification category comparable to the recreation category;
- (2) declined to classify non-navigable anadromous waters as habitat;
- (3) declined to classify much of the moose wintering areas as habitat; and
- (4) declined to classify caribou calving and wintering areas as habitat.; and

WHEREAS, The City of Aleknagik expects that the Department of Natural Resources will incorporate the other considerations of the City of Aleknagik in their 2013 Revised Bristol Bay Area Plan to include:

- (1) Establishing a Subsistence land classification category
- (2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not
- (3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvijack drainages
- (4) Increasing Habitat Classifications for wildlife and fish
- (5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages
- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"

(11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the City Council of the City of Aleknagik requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the City Council of the City of Aleknagik supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the City Council of the City of Aleknagik requests that the Department of Natural Resources join with the tribal councils in holding public meetings on both DNR's proposed changes and the Citizen's Alternative in the villages that sued DNR as soon as possible, and in other communities.

PASSED AND APPROVED by a duly constituted quorum of the City Council of the City of Aleknagik this 9th day of April, 2013.

Comment 405 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 406 of 497 - submitted on 05/03/2013 at 12:00 AM:

Bristol Bay Native Corporation ("BBNC") appreciates having this opportunity to comment on the Alaska Department of Natural Resources ("ADNR") Public Review Draft of the Amendment to the 2005 Bristol Bay Area Plan and Land Classification Order ("Proposed BBAP Amendment").

I. BBNC'S COMMITMENT TO RESPONSIBLE RESOURCE MANAGEMENT

BBNC is the Alaska Native Claims Settlement Act regional corporation for the Bristol Bay region. BBNC owns approximately 3 million acres of subsurface resources and 100,000 acres of surface lands within the Bristol Bay region and has spent the past forty years carefully assessing the mineral and oil and gas potential of those lands. BBNC is committed to managing and developing its lands and resources in a responsible manner for the benefit of current shareholders as well as their descendants. BBNC is also committed to promoting economic development by working in partnership with the twenty-eight village corporations, private landowners, and other entities which own surface lands and subsurface resources throughout the Bristol Bay region.

BBNC believes responsible resource development must be of the right size and scale for the region, community, and environment, must be carried out in the right place and at the right time, and must bring both short-term and long-term benefits to the corporation, shareholders, and villages. With these criteria in mind, BBNC supports the responsible exploration, development, and use of the region's minerals, materials, onshore oil and gas, and other energy resources, including wind, solar, hydroelectric tidal, and geothermal.

BBNC has participated in and supported projects which strengthen the economic productivity of the region without harming its natural resources or cultural heritage. For example, BBNC supported and provided land for the development of the Tazimina Hydroelectric Facility which produces power for the communities of Iliamna, Newhalen and Nondalton. Located in a sensitive wilderness area twelve miles northeast of Iliamna, it was designed to be a "run-of-the-river" facility rather than a traditional impoundment structure. By diverting water two hundred fifty feet upstream of the Tazimina River Falls and taking advantage of a hundred feet of natural head, the hydroelectric facility generates enough electricity to supply nearly all of the power used by the three communities.¹ BBNC also supported the construction of the Bristol Bay Borough dock which serves the region's thriving commercial fishing industry, facilitates fuel delivery for eleven Bristol Bay communities and receives materials for the King Salmon Air Force Station. Naknek is a major regional hub and the fourth busiest seafood port in the country. The volume of cargo passing through Naknek has quadrupled since 1995. With the new dock, super-barges measuring 400 by 100 feet are now able to offload at Naknek.²

BBNC does not support resource development that poses an unacceptable risk to the region. When development is of a size, scale, or design that threatens subsistence resources, culture and traditional practices, or the region's successful commercial and sport fishing industries, BBNC considers the development to present unacceptable risk and contrary to its "Fish First" policy. BBNC's position on any project ultimately reflects its assessment of whether the project has the potential to cause unacceptable levels of harm to the region's environment, economics, or social makeup. For example, BBNC opposes the proposed Pebble Mine and other large-scale metallic sulfide mining in the Nushagak and Kvichak watersheds because of the threats such projects pose to the wild salmon fisheries that are the cultural and economic foundation of the region.³

BBNC is an advocate for its shareholders, as well as a respectful partner alongside the many tribal and community entities within the region's boundaries. It is important that our local communities are fully involved in all decision-making processes that may affect their well-being. BBNC supports the right of Bristol Bay residents to fully participate and be consulted in all Bristol Bay land use and permitting decisions.

II. BBAP History and Context

The State's first major planning effort for the Bristol Bay region led to the adoption of the first Bristol Bay Area Plan ("BBAP" or "Plan") by ADNR in 1984. The Plan divided the Bristol Bay planning area into regions, based largely on river drainages, identified nearly all of the State-owned uplands as "essential" or "important" habitat, and recognized the importance of recreation, hunting, and fishing in the region as a vast majority of uplands also included a co-designation for public recreation.

In 2005, ADNR approved a revision of the BBAP which reflected a major shift in the State's land use management policies and priorities for the region. The vast majority of the land that the 1984 Plan designated for habitat or recreation was re-classified for general use. ADNR did not make any changes to MCO 393 or LLO 1 in 2005, and they remain in effect today.

III. ADNR'S PROPOSED AMENDMENT TO THE BRISTOL BAY AREA PLAN

ADNR released a Proposed BBAP Amendment for public review and comment on January 4, 2013. BBNC supports the changes proposed by ADNR and believes they improve the BBAP. ADNR's proposal does not, however, go far enough in restoring the more balanced approach to land management that existed in the 1984 Plan. In particular, ADNR's proposal fails to adequately protect the subsistence resources and way of life that are central to the culture and traditions of the people in the Bristol Bay region. Moreover, ADNR has failed to provide adequate opportunities for public participation and input in the land management decisions that will affect numerous communities in the region for many years to come.

Strengths of Proposed BBAP Amendment. ADNR's proposal (1) re-classifies or co-classifies approximately 724,000 acres of land in or near the Nushagak River, Mulchatna River, Kvichak River, Talarik Creek and Koktuli River drainages with wildlife habitat or public recreation designations; (2) designates all salmon stream corridors already closed to mineral entry under MCO 393 as wildlife habitat; (3) clarifies that all of Iliamna Lake is a single management unit designated as wildlife habitat; and (4) amends the plan text and accompanying management intent statements to better ensure ADNR's management accounts for sensitive habitats, and revises the criteria used to define sensitive habitat to specifically include moose and caribou wintering and calving habitat. BBNC commends ADNR for proposing these changes. They represent improvements to the BBAP that are geared toward protecting salmon streams and the aquatic habitats that support them, and that offer some additional protection for other key subsistence resources, such as moose and caribou. BBNC supports these wildlife habitat designations because they will ensure careful consideration of salmon, moose, caribou and other subsistence resources in future land use and permitting decisions. This is consistent with BBNC's fundamental belief that economic development is essential in order to ensure a bright future for Bristol Bay, and its equally firm conviction that such development can and should be carried out in a manner that respects and preserves the subsistence way of life that so many Bristol Bay residents rely on.

The Proposed BBAP Amendment also states, without exception, that development projects are precluded on lands designated as wildlife habitat:

... the Wildlife Habitat classification would effectively preclude conveyances to municipalities since these streams and their riparian area cannot be conveyed under the Wildlife Habitat classification. Development projects would be precluded for this same reason.⁴

BBNC supports this conclusion given that areas designated as wildlife habitat are important for the long-term sustainability of salmon resources and other subsistence resources and because many types of development projects—especially large-scale metallic sulfide mining—would indeed be incompatible with the preservation of these fish and wildlife resources.

Shortcomings of Proposed BBAP Amendment. Unfortunately, the Proposed BBAP Amendment stops short of fully acknowledging and addressing the fundamental importance of the subsistence way of life in the Bristol Bay region. The proposal (1) rejects the request for a distinct "subsistence" land use designation; (2) fails to utilize subsistence as a distinct planning criterion; (3) rejects the request to designate the non-navigable portions of salmon streams (other than those included in MCO 393) as wildlife habitat; (4) fails to designate the areas covered by LLO 1 as wildlife habitat, even though it has designated the areas protected by MCO 393 as wildlife habitat; and (5) rejects the request to include within the wildlife habitat designation the vast majority of lands identified as important as moose wintering habitat, and all caribou calving and wintering habitat.

Subsistence. At recent public meetings hosted by ADNR to discuss the Plan Amendment, hundreds of Bristol Bay residents attended and asked ADNR to better protect subsistence resources and habitat. BBNC was pleased to hear in response that ADNR will consider additional protections for subsistence uses.⁵ BBNC supports this potential modification and respectfully urges ADNR to reconsider its decision not to create a separate subsistence designation. Contrary to ADNR's stated position, "recreation" and "wildlife habitat" are not adequate proxies for subsistence and do not fully capture all that is needed to ensure subsistence opportunities that are sufficient to ensure the continuation of ancient cultural practices, traditional lifestyles, and adequate nutrition for subsistence-based communities.⁶ For instance, it is well established that the areas surrounding the communities of Nondalton, Newhalen, and Iliamna are used heavily for subsistence, as shown on the enclosed map.⁷ Yet the majority of these areas are not included in ADNR's proposed wildlife habitat designations. Accordingly, BBNC urges ADNR to designate or co-designate planning region 8 and management unit 1 within region 10 in a manner that explicitly protects subsistence uses.

More generally, protection of areas that are important for the survival of key fish and wildlife species is an important component of protection for subsistence, but it is not sufficient on its own. Adequate protection for subsistence opportunities must take into consideration a number of important factors, such as access to subsistence resources for

harvesting at appropriate locations and times of the year, and reasonable distances for transporting subsistence resources after they have been harvested. Moreover, a subsistence designation should ensure the protection of the character of areas important for the cultural, traditional, and spiritual values associated with subsistence. A true subsistence designation would take into account the need for protections against excessive industrial-scale noise, light, vibration, pollution, structures, water channeling, ground disturbance, and aesthetic degradation in order to avoid diminishing the quality of the subsistence experience.

If ADNR refuses to adopt a distinct subsistence designation or co-designation, it should at a minimum analyze the subsistence-related issues discussed above as part of its analysis and rationale for the wildlife habitat designation in order to address the full scope of what is needed to protect subsistence opportunities. Failure to do so would undercut ADNR's claim that the wildlife habitat designation alone is sufficient to protect subsistence opportunities.

Wildlife Habitat. While ADNR is proposing to increase the acreage of areas designated for wildlife habitat, these proposed areas still remain very small in comparison to the acreage designated for the protection of habitat values in 1984. BBNC urges ADNR to expand its wildlife habitat designations further in order to ensure consistency with the priorities of local communities and with Alaska's constitutional protections for public resources.⁸ In particular, BBNC believes ADNR has offered no valid justification for excluding the non-navigable portions of salmon streams from its wildlife habitat designations.⁹ Headwaters and small tributaries within a watershed are, in fact, some of the most important habitat for ensuring the successful propagation of salmon. We urge ADNR to reconsider its determination on this issue and revise its wildlife habitat designations to include the non-navigable portions of important salmon streams.

In addition, BBNC urges ADNR to expand the wildlife habitat designations in the Proposed BBAP Amendment in order to ensure that moose wintering habitat and caribou calving and wintering habitat are given careful consideration in future land use and permitting decisions. BBNC's shareholders and many others in the region rely heavily on moose and caribou as a part of their diet, as well as for cultural and traditional values associated with the subsistence harvest. As discussed above, BBNC supports the expansion of wildlife habitat designations in the planning area because, while economic development is vitally important, it can and should be carried out in a manner that respects and preserves the subsistence way of life.

BBNC also encourages ADNR to designate the areas covered by LLO 1 as wildlife habitat. ADNR has made a wise and prudent decision to expand its wildlife habitat designations to encompass the salmon stream corridors protected by MCO 393, and it should likewise expand its wildlife habitat designations to include the lands covered by LLO 1. As discussed above, LLO 1 does not preclude any particular type of economic development. It simply requires such development to be conducted under ADNR's leasing process, and this gives ADNR an opportunity to impose conditions designed to prevent and minimize harmful impacts on salmon and other wildlife and the people who depend on these resources. In adopting LLO 1, ADNR determined that "[m]ineral development in the upper Mulchatna and eastern Iliamna Lake drainages has the potential for surface use conflicts with the fish and wildlife resources, especially with the propagation and production of salmon," and that "[t]hese conflicts could also jeopardize the economy of the Bristol Bay region."¹⁰ These findings provide strong support for the designation of these areas as wildlife habitat.

Public Involvement. BBNC appreciates that ADNR came out to the region after it drafted the Amendment¹¹ and held a series of public information meetings to explain its proposed changes. We know DNR received a lot of feedback from Bristol Bay residents, engaged in a constructive dialogue and committed itself to further modify the Amendment to incorporate local opinion. We support those efforts.

Going forward, ADNR should provide more meaningful opportunities for Bristol Bay residents to engage with ADNR in a culturally appropriate oral manner through well-planned and well-documented public hearings. These hearings should be held at times and locations that will maximize participation by the people who reside in the Bristol Bay region and who will be most affected by the plan. People should also be given enough advance notice to plan and prepare for such meetings, and the hearings should be considered an integral part of the planning process and the administrative record, not merely informal information sessions.

IV. MCO 393 and LLO 1

In conjunction with the 1984 Plan, ADNR issued a mineral closing order ("MCO 393"), which closed to mineral entry about 214,000 acres of land along the corridors of 64 streams important for the spawning and rearing of salmon.¹² ADNR also issued a leasehold location order ("LLO 1") as an additional means for preventing conflicts between mining and other uses.¹³ LLO 1 subjects mining claims in the covered area to a leasing process (rather than a more truncated location

process) and thereby ensures the State will have the opportunity to impose conditions on mining activities to protect other uses or resources, such as salmon.¹⁴

BBNC supports the Proposed Amendment in so much as it keeps MCO 393 and LLO 1 in full force and effect. In adopting the orders ADNR recognized the tremendous importance of salmon and other fish and wildlife resources to the Bristol Bay region as well as the threats mining activities pose to those resources. For instance, ADNR's findings emphasize that:

... [t]he Bristol Bay salmon fishery is, and historically has been, the most valuable economic resource in the Bristol Bay region Bristol Bay residents rely heavily on this salmon resource to support their livelihood and economy through commercial, sport, and subsistence fishing activities. The existence and future success of the Bristol Bay salmon fishery depends on the maintenance of anadromous stream habitat for salmon spawning and rearing The subsistence harvest of fish and wildlife is essential to the way of life in Bristol Bay communities ...¹⁵

ADNR's findings further explain that "[m]ineral development in the upper Mulchatna and eastern Iliamna Lake drainages has the potential for surface use conflicts with the fish and wildlife resources, especially with the propagation and production of salmon" and that "[t]hese conflicts could also jeopardize the economy of the Bristol Bay region."¹⁶ Today, the salmon and other fish and wildlife resources in these areas remain just as vital to the region's culture and economy as they have always been. Moreover, large-scale metallic sulfide mining activities currently being proposed pose significant threats to salmon and wildlife resources and their habitat. It follows that the justification for these orders is now as strong as, if not stronger than, it was in 1984.

MCO 393 encompasses uplands along Upper Talarik Creek, the mainstem of the Koktuli River, and portions of the North and South Forks of the Koktuli River.¹⁷ In establishing this order, ADNR relied on its statutory authority to close lands to mineral entry based on a finding that "mining would be incompatible with significant surface uses on the state land."¹⁸ Consistent with this statutory authority, ADNR's issuance of MCO 393 was based on the Commissioner's finding that "[t]he development of mining claims within the active stream channel of designated anadromous streams and adjacent uplands ... creates an incompatible surface use conflict with salmon propagation and production, and jeopardizes the economy of the Bristol Bay region and the management of the commercial, sport, and subsistence fisheries in the Bristol Bay area."¹⁹ BBNC believes that this precludes all surface uses and activities associated with mining, including, but not limited to, the discharge of dredged or fill material, the installation of structures, and the disposal of mining waste. ADNR should specifically state that MCO 393 has this preclusive effect.

According to Pebble Limited Partnership itself, all of the Pebble deposit mining claims post-date ADNR's adoption of MCO 393.²⁰ According to PLP:

Cominco Alaska Exploration (CAE) began investigations in the Pebble Deposit area in 1986 and filed its claims for the Pebble Deposit with the State of Alaska in 1988. Early exploration focused on color anomalies visible from aircraft. The near-surface Pebble West deposit was discovered during the first drilling season in 1988. ... Northern Dynasty Minerals Ltd. (NDML, the parent company of Northern Dynasty Mines Inc.) optioned the property from Teck Cominco (the successor company to CAE's parent company) in 2001 and, in 2002, began an extensive exploration program that is still in progress 9 years later. ... In 2005 NDML discovered the deep-underground Pebble East deposit. Also that year, NDML acquired 100 percent ownership of the Pebble mining claims from Teck Cominco. ...²¹

Given these facts, Pebble's claims cannot be considered "valid existing rights"²² outside the application of MCO 393 and, to the extent the claims encompass areas within the MCO, they should be deemed null and void.²³ In addition, all surface uses and activities relating to the development of the claims should be prohibited.

Similarly, to the extent Pebble's claims encompass areas covered by LLO 1, the claims should not have been made available through the mineral location process. All mining claims and mining-related surface uses and activities in areas covered by LLO 1 should have gone through a leasing process and must comply with conditions imposed for the protection of salmon and other resources and uses.²⁴

V. Conclusion

BBNC is the owner of substantial land and subsurface resources in the Bristol Bay region and, over the past several decades, has engaged in the careful assessment of the mineral and oil and gas development potential of those lands. BBNC has developed strong working relationships with the numerous village corporations, private landowners, and other entities in the region who share BBNC's interest in responsible economic development. BBNC also supports the efforts that State has taken and is taking to encourage development in the Bristol Bay region. We believe there is a wide range of

development activities that are appropriate for the region and these comments should not be considered as any retreat from that viewpoint.

BBNC is also an advocate for communities who value their traditional culture and subsistence way of life and participate in the region's vibrant commercial and sport fishing industries. BBNC thus has a strong interest in ensuring that land use planning in the region encourages economic development while at the same time protecting the region's abundant fish and wildlife resources. ADNR's Proposed BBAP Amendment is a good start, but does not yet achieve a balanced approach to land use planning that adequately protects subsistence resources and subsistence opportunities. We encourage ADNR to incorporate the additional changes recommended in these comments. Doing so will result in an Area Plan the community and people of Bristol Bay will be able to support.

Very truly yours

Enclosures: 1. Callaway Subsistence Report; 2. Subsistence Use Map

1 See INN Electric Cooperative, Inc., About Us, available at <http://www.innelectric.com/about-us/> (last visited April 12, 2013).

2 See Bristol Bay Times, Naknek's Dock Gets Official Welcome (June 29, 2012), available at http://www.thebristolbaytimes.com/article/1226nakneks_dock_gets_official_welcome (last visited April 12, 2013).

3 See Callaway, Don, A Statistical Description of the Affected Environment as it Pertains to the Possible Development of the Pebble Mine-17 Communities in Bristol Bay (July 23, 2012), attached as Enclosure 1.

4 Proposed BBAP Amendment, at 22 (Jan. 4, 2013) (footnote omitted, emphasis added).

5 ADNR's representative mentioned, by way of example, including a management intent statement that would require the consideration of subsistence uses in land-use decisions regarding particular areas.

6 At informational meetings in Igiugig, Naknek, and Port Heiden, ADNR also asserted that subsistence uses are protected by virtue of the fact that subsistence is a generally allowed use under 11 AAC 96. The fact that ADNR's regulations deem subsistence a generally allowed use does not, however, equate with the protection of subsistence values on that State land. ADNR acknowledges that subsistence is an important value in the Bristol Bay region and therefore its area plan should reflect that importance and adequately protect subsistence opportunities. To the extent that ADNR accurately relayed the agency's formal position on subsistence at these meetings, the position is wholly unjustified and should be explicitly rejected in the final plan amendment.

7 See Map 3, Subsistence Use in Nushagak-Kvichak Communities, attached as Enclosure 2. See also Callaway, Don, A Statistical Description of the Affected Environment as it Pertains to the Possible Development of the Pebble Mine-17 Communities in Bristol Bay (July 23, 2012), attached as Enclosure 1.

8 At recent informational meetings in the Bristol Bay region, ADNR asserted that many of the changes contained in the 2005 Plan were required so that the state could convey 125,000 acres of land to the Lake and Peninsula Borough. That justification is suspect. How could a need to convey 125,000 acres of land justify the re-designation of many millions of acres of state land? During the creation of the 2005 Plan, ADNR took the position that it would designate approximately 620,000 acres of land as suitable for settlement in order to meet its obligation to the borough. See Memorandum from Bruce Phelps to Rick Frederickson re Public Review Draft BBAP (October 13, 2004). Those lands designated for settlement still are still so designated and should be sufficient to make the necessary conveyances to the Land and Peninsula Borough.

9 At recent informational meetings in the Bristol Bay region, ADNR has offered several reasons for why it cannot designate as habitat all anadromous streams, including, (1) the state does not own non-navigable waters and (2) needs the acreage to complete conveyances to the Lake and Peninsula Borough, and (3) that would result in mapping too fine for area planning purposes. These explanations are either entirely false or pretty meager justifications.

10 LLO 1, at 3 (Findings of the Commissioner).

11 While BBNC supports ADNR's use of the public information meetings, it would have been better if the agency had utilized a scoping process or otherwise gathered regional input before preparing the Proposed Plan Amendment.

12 See Alaska Dept. Natural Resources, Mineral Order No. 393 Closing Lands to Mineral Entry (effective Sept. 13, 1984) ["MCO 393"].

13 See Alaska Dept. Natural Resources, Mineral Leasehold Location Order No. 1 (effective Sept. 13, 1984) ["LLO 1"].

14 See LLO 1, at 1 ("After the effective date of this order ... rights to locatable minerals in the land covered by this order may be acquired only under the leasehold location system, AS 38.05.205, and may not be acquired by locating a mining claim under AS 34.05.195."). See generally Alaska Dept. Natural Resources, Fact Sheet: Upland Mining Leasehold Location (June 2010), available at <http://dnr.alaska.gov/mlw/factsht/>.

15 MCO 393, Attachment 2, at 1-2. Accord LLO 1, Attachment B, at 1-2.

16 LLO 1, at 3 (Findings of the Commissioner). Accord MCO 393, at 2 (Findings of the Commissioner).

17 LLO 1, Attachment 1 and Attachment 1.1.

18 AS§ 38.05.185(a) (1984) (emphasis added).

19 MCO 393, at 2 (emphasis added). Similarly, ADNR issued a mineral closing order for State lands in the Matanuska-Susitna Valley based on its findings that "certain stream systems in the area and their adjacent riparian uplands were 'used extensively by the public for fishing, floating, boating, transportation to hunting, and public access corridors;" that "salmon and other fish populations in these river systems not only supported substantial sport fishing, but were also major contributors to the Upper Cook Inlet commercial salmon fishery;" that "these activities constituted 'significant surface uses' of state land under AS 38.05.185(a);" and that "mining was incompatible with these significant uses and thus threatened an important segment of the economy of the Susitna basin." *Ellis v. State of Alaska*, 944 P.2d 491, 494 (Alaska 1997) (emphasis added). In a lawsuit challenging that mineral closing order the court upheld the order, which precluded mining activities that interfered with such surface uses, as "reasonable and supported by the evidence in the record." *Id.* at 495.

20 See Pebble Limited Partnership, Environmental Baseline Document, Ch. 1 § 1.3, at 1-2 (Sept. 8, 2011).

21 *Id.* (emphasis added).

22 MCO 393, at 1.

23 See *Kile v. Belisle*, 759 P.2d 1292, 1295 and 1295 n. 5 (Alaska 1988) (applying the "general rule" that "mining claims located upon lands withdrawn from mineral entry are void ab initio") (citations omitted).

24 See note 14, *supra*.

Comment 407 of 497 - submitted on 05/03/2013 at 09:39 PM:

The Bristol Bay Area Plan Amendment 2012 DOES NOT put enough emphasis on the protection of lakes, rivers, and streams. The salmon of Bristol Bay are an important source to the economy of that region. It is also a heritage to the people that live there. Once the salmon run is gone, it is gone forever. Please be a little more strict with your plan. I also would like to thank you for giving me this opportunity for my comment.

Thomas Soltis, Soldotna

Comment 408 of 497 - submitted on 04/29/2013 at 11:59 AM:

it's very stupid to poop where you eat

given our experience with the oil business, how could anyone with an IQ over 10 trust "development" interests to protect such a sensitive natural asset?

Comment 409 of 497 - submitted on 05/05/2013 at 11:59 AM:

There appears to be no protection afforded to the Chulitna River, which is the main subsistence area for Nondalton, as well as a major tributary to Lake Clark. The "settlement area" in the basin would affect the stream and wildlife habitats of the entire watershed, on downstream into Lake Clark National Park. Major impacts include water quality, fisheries habitat, air quality, bear, moose, wolf, ptarmigan, waterfowl and furbearer habitats, caribou calving and wintering areas in the watershed, and water quality, migratory paths for whitefish and pike, salmon spawning on lower 6-mile and Lake Clark, and migratory routes for salmon bound for middle and upper Lake Clark drainages.

Another concern is the settlement areas located flush against Lake Clark on the south in the valleys of Chikok and Canyon Creeks and the Pile River. All of these areas are rich moose habitat, and support many furbearers and bear.

This entire plan appears to be a thinly veiled mining plan of operations and access.

Thank you

Page Spencer, Ph.D.

Retired, Chief of Natural Resources

Lake Clark NP&P

Comment 410 of 497 - submitted on 05/03/2013 at 12:00 AM:

It is urgent you adopt the Citizens Plan for Bristol Bay. Please don't allow special interests to destroy vital Alaskan salmon habitat. If we allow Pebble Mine to proceed, as is, it will be a sad day in Alaskan history.

Comment 411 of 497 - submitted on 04/17/2013 at 12:00 AM:

The 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments beyond those agreed to in the settlement of Nondalton Tribal et al v. State of Alaska, are not necessary. Furthermore, the revisions set a dangerous precedent for future area plans.

Using litigation to force further changes in an area plan sets a dangerous precedent to let groups opposing specific projects hold sway, especially over an area plan that impacts 19 million acres.

Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use.

Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.

Thank you

Comment 412 of 497 - submitted on 04/17/2013 at 12:00 AM:

The 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments beyond those agreed to in the settlement of Nondalton Tribal et al v. State of Alaska, are not necessary. Furthermore, the revisions set a dangerous precedent for future area plans.

Using litigation to force further changes in an area plan sets a dangerous precedent to let groups opposing specific projects hold sway, especially over an area plan that impacts 19 million acres. Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use. Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.

Thank you

Comment 413 of 497 - submitted on 05/06/2013 at 09:04 PM:

May 6, 2013

Mr. Ray Burger(Resource Assessment and Development Section(

Alaska Department of Natural Resources(

550 West 7th Avenue, Suite 1050(Anchorage, Alaska 99501-3579

Email: dnr.bbapamend@alaska.gov

Fax: (907) 269-8915

Dear Mr. Burger

As members of Alaska's thriving business community, Copper River Seafoods recognizes that the fisheries in Bristol Bay are vital to the economic stability of the region and nation.

We in the fishing community have much appreciated the continued effort to protect the "national treasure" that is Bristol Bay. Copper River Seafoods and other sustainable seafood companies believe administrative action must be implemented to insure permanent protection for the prospering industry and fragile ecosystem.

Sustainability must be fought for; we fight for it and you have fought for it. We are now asking you for continued support. Your actions could ensure a positive and sustainable economic environment for the Alaskan coastal community. We respectfully urge you to protect Bristol Bay permanently, for the betterment of Alaska and our nation.

Sincerely,

Cassandra Squibb, Chief Business Development Officer

Copper River Seafoods

Comment 414 of 497 - submitted on 04/18/2013 at 12:00 AM:

To Whom It May Concern,

The 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments beyond those agreed to in the settlement of Nondalton Tribal et al v. State of Alaska, are not necessary. The following are points that I believe are important;

- 1) DNR has a constitutional obligation to manage state-owned lands for the "maximum public benefit" based on the directive in Article VIII Section 1 of the Alaska Constitution: "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." Sole designation of large sections of the state for wildlife or recreation is contrary to constitutional mandates.
- 2) DNR agreed to a settlement, which led to this plan revision, to make six changes to the Bristol Bay Area Plan. Considering that the original plan went through the normal process of public hearings and review, the changes should be limited to those agreed to in the case.
- 3) Using litigation to force further changes in an area plan sets a dangerous precedent to let groups opposing specific projects hold sway, especially over an area plan that impacts 19 million acres.
- 4) Area planning should be seen in the context of the broader permitting scheme - this does not mean, for example, that because an area has been classified as "mineral" that a mine has been or will be permitted - the classification identifies resource potential, not fully permitted activities.
- 5) Banning certain activities in an area plan ignores constitutional mandates that include development and multiple use.
- 6) The 2005 BBAP does not favor mining above other uses. More lands were classified as "mineral" lands in this version because of the additional inventories done between 1984 and 2005 that reflected this potential use. "Mineral" lands are still managed for multiple use, and in most cases are still available for recreation, hunting, fishing, and subsistence activities.
- 7) Subsistence activities are included in the regulatory definition of "Wildlife Habitat Land," so there is no need to add a separate category for "subsistence." Additionally, subsistence is a generally allowed use on state land, and area plans do not affect "generally allowed uses."
- 8) Managing "Subsistence" activities is outside of DNR's jurisdiction. DNR manages land, and the Board of Game decides what subsistence and hunting activities occur in that area.
- 9) Alaska contains known deposits of Rare Earth Elements (REEs). Many of these REEs are imported to the United States, often from countries with lesser environmental regulations. according to the Mineral Commodities Summaries 2012 report by the U.S. Geological Survey, the U.S. depended on imports of 50-100% of needs for 43 minerals in 2011, some of which are found in Alaska. Keeping areas open to mineral extraction in Alaska not only provides the opportunity for future responsible resource development, it may also improve national security.
- 10) Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use.
- 11) Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.
- 12) The area included in the BBAP should be further evaluated for mineral potential before restrictive land designations are implemented. Sufficient mapping and geological information should be acquired, and until then, the area should be left open to all uses.

Sincerely

Comment 415 of 497 - submitted on 04/17/2013 at 12:00 AM:

To Whom It May Concern,

The 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments beyond those agreed to in the settlement of Nondalton Tribal et al v. State of Alaska, are not necessary. The following are points that I believe are important;

- 1) DNR has a constitutional obligation to manage state-owned lands for the "maximum public benefit" based on the directive in Article VIII Section 1 of the Alaska Constitution: "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." Sole designation of large sections of the state for wildlife or recreation is contrary to constitutional mandates.
- 2) DNR agreed to a settlement, which led to this plan revision, to make six changes to the Bristol Bay Area Plan. Considering that the original plan went through the normal process of public hearings and review, the changes should be limited to those agreed to in the case.
- 3) Using litigation to force further changes in an area plan sets a dangerous precedent to let groups opposing specific projects hold sway, especially over an area plan that impacts 19 million acres.
- 4) Area planning should be seen in the context of the broader permitting scheme - this does not mean, for example, that because an area has been classified as "mineral" that a mine has been or will be permitted - the classification identifies resource potential, not fully permitted activities.
- 5) Banning certain activities in an area plan ignores constitutional mandates that include development and multiple use.
- 6) The 2005 BBAP does not favor mining above other uses. More lands were classified as "mineral" lands in this version because of the additional inventories done between 1984 and 2005 that reflected this potential use. "Mineral" lands are still managed for multiple use, and in most cases are still available for recreation, hunting, fishing, and subsistence activities.
- 7) Subsistence activities are included in the regulatory definition of "Wildlife Habitat Land," so there is no need to add a separate category for "subsistence." Additionally, subsistence is a generally allowed use on state land, and area plans do not affect "generally allowed uses."
- 8) Managing "Subsistence" activities is outside of DNR's jurisdiction. DNR manages land, and the Board of Game decides what subsistence and hunting activities occur in that area.
- 9) Alaska contains known deposits of Rare Earth Elements (REEs). Many of these REEs are imported to the United States, often from countries with lesser environmental regulations. according to the Mineral Commodities Summaries 2012 report by the U.S. Geological Survey, the U.S. depended on imports of 50-100% of needs for 43 minerals in 2011, some of which are found in Alaska. Keeping areas open to mineral extraction in Alaska not only provides the opportunity for future responsible resource development, it may also improve national security.
- 10) Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use.
- 11) Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.
- 12) The area included in the BBAP should be further evaluated for mineral potential before restrictive land designations are implemented. Sufficient mapping and geological information should be acquired, and until then, the area should be left open to all uses.

Sincerely

Comment 416 of 497 - submitted on 05/05/2013 at 09:51 AM:

I support a more balanced approach to planning for the Bristol Bay area than your agency has written. The more balanced plan, the Citizens Alternative Plan, incorporates all stakeholders, and ensures that the region will be valued and managed by assessing and prioritizing Bristol Bay's sustainable resources.

Comment 417 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years

working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 418 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

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- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 419 of 497 - submitted on 04/30/2013 at 04:34 PM:

I support the Citizens Alternative to the Bristol Bay Area Plan.

We need to do a better job of managing our State resources for the benefit of Alaskans, not for outsiders. Protect our water, our wildlife, and our way of life.

Listen to the people of Alaska, not those who want to strip us of our resources for their private gain.

Sincerely,

Beverly Stephens

Big Lake, AK

Comment 420 of 497 - submitted on 04/29/2013 at 05:21 PM:

I support the Citizens Alternative, re: Bristol Bay and the potential problems with the Pebble Mine, located so close to the waters of the greatest Salmon fishery in the world. We cannot take the risk of allowing this mine to go through the steps toward enactment of their plans. Why take the risk of shutting down the harvesting of the fish for subsistence, commercial and sports fishing. Too many problems with the remaining wildlife which also depend on the streams and rivers in the contested areas for a healthy ecosystem.

From the start, I wanted to help "Stop the Pebble Mine" for a lot of reasons, stated above. The planet doesn't exist to dig up all the resources for the detriment of another resource's possible demise.

Mary Helen Stephens

Comment 421 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
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Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 422 of 497 - submitted on 04/23/2013 at 12:00 AM:

- DNR has a constitutional obligation to manage state-owned lands for the "maximum public benefit" based on the directive in Article VIII Section 1 of the Alaska Constitution: "to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest." Sole designation of large sections of the state for wildlife or recreation is contrary to constitutional mandates.
- DNR agreed to a settlement, which led to this plan revision, to make six changes to the Bristol Bay Area Plan. Considering that the original plan went through the normal process of public hearings and review, the changes should be limited to those agreed to in the case.
- Using litigation to force further changes in an area plan sets a dangerous precedent to let groups opposing specific projects hold sway, especially over an area plan that impacts 19 million acres.
- Area planning should be seen in the context of the broader permitting scheme - this does not mean, for example, that because an area has been classified as "mineral" that a mine has been or will be permitted □ the classification identifies resource potential, not fully permitted activities.
- Banning certain activities in an area plan ignores constitutional mandates that include development and multiple use.
- The 2005 BBAP does not favor mining above other uses. More lands were classified as "mineral" lands in this version because of the additional inventories done between 1984 and 2005 that reflected this potential use. "Mineral" lands are still managed for multiple use, and in most cases are still available for recreation, hunting, fishing, and subsistence activities.
- Subsistence activities are included in the regulatory definition of "Wildlife Habitat Land," so there is no need to add a separate category for "subsistence." Additionally, subsistence is a generally allowed use on state land, and area plans do not affect "generally allowed uses."
- Managing "Subsistence" activities is outside of DNR's jurisdiction. DNR manages land, and the Board of Game decides what subsistence and hunting activities occur in that area.

- Alaska contains known deposits of Rare Earth Elements (REEs). Many of these REEs are imported to the United States, often from countries with lesser environmental regulations. According to the Mineral Commodities Summaries 2012 report by the U.S. Geological Survey, the U.S. depended on imports of 50-100% of needs for 43 minerals in 2011, some of which are found in Alaska. Keeping areas open to mineral extraction in Alaska not only provides the opportunity for future responsible resource development, it may also improve national security.

- Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use.

- Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.

- The area included in the BBAP should be further evaluated for mineral potential before restrictive land designations are implemented. Sufficient mapping and geological information should be acquired, and until then, the area should be left open to all uses.

Best Regards

Comment 423 of 497 - submitted on 05/02/2013 at 12:00 AM:

The 2005 BBAP struck an appropriate balance between various stakeholder interests, and proposed amendments are not necessary. Furthermore, the revisions set a dangerous precedent for future area plans.

Best Regards

Comment 424 of 497 - submitted on 05/06/2013 at 12:00 AM:

I support resource development of the State Lands in the Bristol Bay area that can by permit can coexist with the area's salmon industry. The additional development will allow for local jobs to help the rural communities with jobs that don't currently exist. The permit conditions placed on the mine will ensure that no impacts will occur to the fishery.

I urge you not to change the 2005 Bristol Bay Area Plan (BBAP) for the following reasons:

- The 2005 BBAP does not favor mining above other uses. More lands were classified as "mineral" lands in this version because of the additional inventories done between 1984 and 2005 that reflected this potential use. "Mineral" lands are still managed for multiple use, and in most cases are still available for recreation, hunting, fishing, and subsistence activities.

- Subsistence activities are included in the regulatory definition of "Wildlife Habitat Land," so there is no need to add a separate category for "subsistence." Additionally, subsistence is a generally allowed use on state land, and area plans do not affect "generally allowed uses."

- Managing "Subsistence" activities is outside of DNR's jurisdiction. DNR manages land, and the Board of Game decides what subsistence and hunting activities occur in that area.

- Alaska contains known deposits of Rare Earth Elements (REEs). Many of these REEs are imported to the United States, often from countries with lesser environmental regulations. According to the Mineral Commodities Summaries 2012 report by the U.S. Geological Survey, the U.S. depended on imports of 50-100% of needs for 43 minerals in 2011, some of which are found in Alaska. Keeping areas open to mineral extraction in Alaska not only provides the opportunity for future responsible resource development, it may also improve national security.

- Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use.

- Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.

Very Truly Yours

Comment 425 of 497 - submitted on 05/05/2013 at 12:00 AM:

These are my comments on the proposed amendments and reclassifications determination to the 2005 Bristol Bay Area Plan ("2005 Plan").

My views are aligned with the 1984 Plan as opposed to the 2005 Plan and these proposed revisions to that Plan ("2013 Plan revisions"). The purpose of the 1984 plan contains two bullet points:

- to conserve the fish and wildlife and other significant natural and cultural resources within the region;
- to provide for the rational and orderly development of economic resources within the region in an environmentally sound manner.

The 2005 Plan's purpose excerpts from AS 38.04.005 and the proposed 2013 Plan revisions expand on that.

The 2005 Plan and the 2013 Plan revisions may reflect statute, but the 1984 Plan gets to the heart of the issue. The 1984 Plan puts fish and wildlife as the number one priority, with rational, environmentally sound, and orderly resource development subordinate.

Page 2-7 of the 1984 Plan states:

The Bristol Bay Area Plan places fish and wildlife habitat and harvest as a primary use throughout the Bristol Bay study area. Commercial fishing, sport fishing and hunting, and subsistence activities are all based on fish and wildlife resources. The harvest and nonconsumptive use of these fish and wildlife resources are a major economic resource value to residents of the Bristol Bay area, the State of Alaska, and the Nation. Through implementation of the plan (including plan guidelines), fish and wildlife resources and the income and employment generated from the harvest of fish and wildlife resources can be expected to continue indefinitely, thereby providing a sound economic base for Alaska and the Bristol Bay area.

I couldn't agree more with the 1984 Plan on this point. The Bristol Bay watershed, with its enormous and diverse sockeye salmon runs and healthy populations of fish and wildlife are, in fact, "world class." The salmon provide so much benefit, not only to fishery related economies such as sport fishing, tourism, seafood processing, and commercial fishing, but also to subsistence and cultural values. The salmon also are essential to maintaining the health, diversity, and productivity of the watershed ecosystem on which so much depends.

The state has a duty to protect the biological health and integrity of the watershed, as recognized in the above two bullet cite from the 1984 Plan.

For example, a 700 foot high, several mile long earthen dam that is intended to contain up to 10 billion tons of mine waste; located in the pristine and high value environment of the Bristol Bay watershed; to be in place, maintained, and monitored for a hundred years or more; is not environmentally sound. It does not represent orderly development. And, it is not rational.

The risk of failure of the earthen dam, whether from earthquake, inadequate design and/or construction, extreme weather event, sabotage, deterioration over time, ineffective monitoring and maintenance over the next 100 or more years, is close to a sure bet. The risk is too high; the consequences too great, with Alaskans in all likelihood bearing the cost of the impacts and of the clean-up. Not only would a development project of this scale and scope be irrational in this place, so would DNR's failure to protect the area's land, water, fish and wildlife by providing the necessary management policy and guidance in these 2013 Plan Revisions.

I have read the summaries of the Citizen's Alternative Bristol Bay Area Plan and on that basis, and because I think that a Plan of the people who live in Bristol Bay should carry significant weight, I support the Citizen's Alternative. Bristol Bay watershed provides so much; it must be protected.

Sincerely

Comment 426 of 497 - submitted on 05/01/2013 at 01:01 PM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I work in Bristol Bay. Please understand that the true treasure of Bristol Bay lies in it's pristine and unaltered state.

Comment 427 of 497 - submitted on 05/01/2013 at 12:25 PM:

I feel that as a state we should be protecting our natural resources instead of investing in a short term plan to make money.

Comment 428 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 429 of 497 - submitted on 04/29/2013 at 07:12 AM:

Hello and I appreciate the chance to comment on this important issue:

First, I acknowledge that I have fished the Bristol Bay region, the Lake Iliamna area, and other inland and coastal waters of southwestern Alaska.

Secondly, I am a graduate degreed Ecologist with 40 years of experience in environmental issues, mining issues, and regulatory compliance in all matters related to land use, water quality, water pollution protection, and mine engineering and design.

Finally, as an interested tourist, with plans THIS SUMMER to take my extended family on a cruise in waters along the Alaska Coast, and plans to visit the state about once per year for the rest of my life, I believe I have some standing to comment.

Please allow for the regulatory process to proceed, on lands that are not already decreed or regulated as wilderness, national monument, state park, national park, or wildlife refuge.

THIS means that the important concept of diversity, which all ecologists almost worship in the natural community, must also be honored in the human community. diversity of employment, diversity of resource production, diversity of

development, diversity of wildlife and fisheries... these can and do coexist where thoughtful land use regulation and land development planning are held to the highest standards.

This can happen in Alaska, as elsewhere, and the very tight gauntlet that all development projects must now go through presents a very compelling case that new projects, approved under new and stringent permit processes and public review processes, will be conceived and executed well.

If given the chance.

DNR has a constitutional obligation: to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest.

dedicate some lands as wilderness, dedicate some lands as wildlife refuges, but also realize that other lands must provide access to the diversity of real goods our future generations will need access to.

Resource development in the area could provide economic benefits to the region, as well as improved or added infrastructure and access to areas for multiple use.

Multiple uses should include mining (exploration, leasing, development), as well as recreational and other potential uses. With less than one percent of Alaska in conventional private ownership, access should be available on other lands.

The area included in the BBAP should be further evaluated for mineral potential before restrictive land designations are implemented. Sufficient mapping and geological information should be acquired, and until then, the area should be left open to all uses.

keep balance and stability in our social systems will also allow us to keep diversity in our natural environment.

best regards,

Jamie Sturgess

Comment 430 of 497 - submitted on 03/13/2013 at 12:00 AM:

Please note the recent 2 earth quakes in the Naknek/Iliamna area. Toxic by products of mining stored at the upper end of these pristine watersheds cannot be allowed, because safe storage cannot be guaranteed. Please work to protect all waters (including non navigable streams where the Salmon spawn) in the Iliamna and Nushagek watersheds, and return protections to the 1984 Bristol Bay Area Primary Use Designation Plan.

I have worked at the Bristol Bay Area Health Corporation as a registered nurse since 1991. Dillingham and the 26 villages which exist in Bristol Bay depend on Salmon for food and income. The health and well being of these hardy, wonderful, subsistant people, is dependant on clean water.

Sincerely

Comment 431 of 497 - submitted on 05/01/2013 at 06:13 PM:

Economic benefit of Pebble Mine go primarily to foreign corporations while causing hardships on a large number of Alaskan residents. The economic benefits of the Bristol Bay fisheries and tourism industries go far beyond that of the Pebble mine, and stay primarily in Alaska!

Comment 432 of 497 - submitted on 05/01/2013 at 03:37 PM:

I strongly urge, recommend, and beg the State to take a broader approach to the Bristol Bay Area Plan than the State's 2005 Bristol Bay Area Plan and the proposed amendments. I've reviewd the plan and think it is not in line with the best land use for the most number of people. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why I (live in, work in, visit) Bristol Bay.

Comment 433 of 497 - submitted on 03/26/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 434 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

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- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 435 of 497 - submitted on 05/01/2013 at 10:40 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative includes many of the reasons why Bristol Bay is visited yearly by people from all over the world. Alaska has a "salmon economy" ...be it subsistence, recreational fishing, or commercial fishing. Our people use subsistence and we have a huge commercial fishing industry, but people from all around the world come here for recreational fishing/adventures. This has become a huge part of the Alaskan economy. We are famous the world over for salmon. We need to remember that.

Sincerely,

Cathy Teich

Comment 436 of 497 - submitted on 04/16/2013 at 12:00 AM:

To Whom It May Concern:

RE: In Support of the Citizens' Alternative Bristol Bay Area Plan

The 2005 Bristol Bay Area Plan (BBAP) used marine criteria to exclude inland habitat far from the coast. It defined recreation excluding hunting and fishing and used navigability as a criterion to designate anadromous streams as habitat. This is not acceptable for the region. It bypasses many things that are critical to the Bristol Bay region. The Citizens' Alternative Bristol Bay Area Plan takes into consideration the habitat and its importance for a variety of activities, making it the better of the two plans.

The Citizens' Alternative Bristol Bay Area Plan (CABBAP) offers better mapping to designate primary uses and improve public participation. It relies on science. Each designated use and corresponding classification is justified using maps to avoid confusion and fully inform the public.

The CABBAP is consistent with the history of state, federal, local and tribal efforts to balance conservation and development in the Bristol Bay drainages. It is consistent with the vision statement of the Bristol Bay Visioning Project. The vision statement seeks to protect and encourage a local economy based upon renewable resources and to allow non-renewable resource development that DOESN'T THREATEN THE RENEWABLE RESOURCES.

The CABBAP improves area-wide management guidelines to ensure that habitat, recreation and subsistence are protected.

The first plan for the Bristol Bay area was adopted in 1984. It emphasized protecting fish and wildlife habitat, as well as hunting and fishing. DNR's 2005 revision of the Bristol Bay Area Plan was drastically different. It eliminated nearly all

prior classifications of the land for habitat, hunting and fishing and classified the lands with mineral deposits only as mineral lands (including the land at the Pebble deposit). Under this plan, mineral development doesn't have to be compatible with the habitat or with traditional hunting and fishing. This is just blatant disregard for the stakeholders and □legislating for mineral companies□. The 2005 plan transformed habitat, subsistence, and recreation into □prohibited uses□ when they conflict with mining or mineral exploration. The 2005 plan is ridiculous...and SHOULD BE ILLEGAL. The Citizens' Alternative Bristol Bay Area Plan is based on science and is in line with the 1984 plan. The lands have not changed. The uses have not changed. The 2005 plan was an inside job to consider only big mining industry. This is an embarrassment to our state.

Alaska is Salmon. That's what we have been known for...forever. Bristol Bay is the richest salmon fishery in the world. Anything that would threaten it...in any way...should never even be considered. To do so would be insanity. As time marches on, our food and water supplies will be our greatest resources. Any person, or group of people, who tries to weaken our protections for our food and water do not have the best interests of Alaskans at heart (or citizens of the U. S. or the world, for that matter).

Adapt the Citizens' Alternative Bristol Bay Area Plan. It is the only ethical option.

Sincerely

Comment 437 of 497 - submitted on 05/01/2013 at 07:58 AM:

Please return to a science based plan for the Bristol Bay region that takes into consideration the long term needs of the residents of this region and all Alaskans. Please do not jeopardize our heritage for short term financial gain that will put the streams and lakes and their abundant fish populations at grave risk.

Thank you for your consideration, John Thomas

Comment 438 of 497 - submitted on 05/05/2013 at 10:04 AM:

As an Alaskan resident and a fisherman, I am very upset by the DNR's bias towards mining in the Bristol Bay region over Alaskan fishermen. The claims of jobs that will be provided by the Pebble mine are not true. Alaskans hear this every time some big outside corporation wants to come in and exploit our resources. They may hire a couple of local businesses for concessions and janitorial work, but they will fly in their people, take our minerals, and then fly out leaving us a big toxic mess. The salmon however will be gone forever. It is puzzling how the state could even be considering this. Aren't you supposed to be representing Alaskans? There is no benefit to Alaskans in the Pebble mine. The only benefit in this huge environmental disaster is to a Canadian mining company. All these mining contracts will go to the lowest bidder. Everything will have to be shipped in. Will any Alaskan firms win those bids? No. This is not going to create jobs, the Pebble Mine isn't going to train local residents, they are going to fly in their own people. If Pebble Mine gets their way, these won't even be Americans.

The salmon that spawn in the Bristol Bay, however, do benefit Alaskans from all over the state. Alaskans have boats, we do fish for salmon, we do have local industry around that. If you let the Pebble Mine go through, you will be destroying local industry that has existed for centuries in favor of a Canadian mining company that will take our jobs and our natural resources and leave Alaska with a toxic mess.

Comment 439 of 497 - submitted on 05/03/2013 at 11:44 AM:

Dear Sirs,

My name is Everett Thompson. I am a Bristol Bay resident from Naknek. I am a co-chair on our ADF&G advisory council, Naknek Tribal Council Vice President, ex board member of BBEDC and a lifelong commercial fisher. I am also an avid sport/subsistence hunter and fisher in the area and a land owner. My family has native allotment from South Naknek all the way up the Kvichak river and into Lake Iliamna. I am writing you on behalf of myself and my family to support changes in the new BBAP that better protect Fish and Game.

I have a hard time knowing that non-navigatable streams are not protected as habitat. Anyone that has ever been around salmon know that small streams around here are chalk full of salmon in the summer.

I have a hard time knowing that moose and caribou calving grounds are not fully protected.

I have a really hard time knowing that DNR cut the habitat classification by over 90% from 84' to 2005.

DNR is an agency for the people of the state of Alaska. It seems more often than not that DNR act like a granting agency for corporations giving little thought to the real resources of the state, which are the People and their means to Subsist, to

Live. Yes, jobs are great, but I have a job that has provided me and my family for generations and DNR is threatening my job and the marketability of my product by what seems to be catering to big business before its own people.

I would like to see DNR's new 2013 to adopt the "Citizen's Alternative Bristol Bay Area Plan"

At the very least I would like DNR to:

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning areas.
- Prohibit metallic sulfide mines in the Nushigak and Kvichack drainages.....BBEDC passed a resolution against all metallic sulfide mines in and around salmon spawning grounds.
- Create a BB Advisory board, this should have been in effect this whole time. There was a total disconnect when doing the 2005 Plan...
- Reserve water levels for fish.
- increase habitat for fish and wildlife.
- Make sure all new classifications have Fish First! Everything needs to be compatible with fish.

A resident of King Salmon recently wrote an op ed in the ADN, Dick Russell. He helped with the 84' Plan. This 2005 Plan was a joke. Make sure the 2013 Plan is built for the people, the real resources of the State, not for Big Money.

Sincerely, Everett Thompson

Everett Thompson F/V Chulyen

PO Box 151

Naknek, Alaska 99633

Comment 440 of 497 - submitted on 05/04/2013 at 05:43 PM:

Dear Mr. Burger,

I live in Naknek with my husband and two children and am writing to express my concerns over the revision of our Bristol Bay Area Plan. I was disappointed to learn that the 2005 plan eliminated nearly all prior classifications of land for habitat, hunting and fishing and made mining and mineral exploration the only designated use on 9.4 million acres within Bristol Bay's drainages. It is also distressing that now mineral development like the proposed Pebble mine DOES NOT have to be compatible with habitat, public hunting and fishing, or subsistence use. These drastic changes to our area plan are very alarming.

I'm most discouraged by DNR's refusal to include a subsistence land classification category, even though you have a classification for recreational hunting and fishing. Subsistence is not just a hobby for people out here. Catching, smoking, canning, and freezing our fish means food on the table. Not just any food, but healthy and affordable wild Alaskan salmon. Hunting moose and caribou is a privilege we don't take for granted. It means meat on the table. And not just any meat, but wild, free-range game that we harvest properly ourselves. The alternative in the store is over-priced, factory-raised, hormone and antibiotic-filled mystery meat. We prefer to feed our children natural, high-nutrient foods instead of garbage. Subsistence hunting and fishing makes this possible, even though it's hard work. I'm fortunate my husband has the skills and desire to provide this way. Out here in Bristol Bay, we hold our fish and wild game in high regard. We hunt and fish with great respect for these animals that feed us, which is why we will always fight to protect them and the habitat they depend on.

I respectfully ask you to recognize subsistence as important enough to make it a land classification category and include areas that are of high use and value to local residents. Please classify both moose and caribou calving and wintering grounds as habitat. Allowing uses of state land that disrupt moose and caribou activity will likely make these wild game even more scarce. In Bristol Bay, all streams where salmon spawn should be classified as habitat, whether they are navigable by boat or not. This is common sense. If spawning grounds are not protected, these delicate nurseries holding the next generation of salmon are in jeopardy. Subsistence is not just a lifestyle choice, it's a means of survival here and I hope that the 2013 Bristol Bay Area Plan will acknowledge that.

I fully support all elements of the Citizen's Alternative Bristol Bay Area Plan because it was created in collaboration with Native tribes, commercial & sport fishermen, and residents who are most affected by land management decisions here in Bristol Bay. I ask that you incorporate the Citizen's Alternative into the 2013 Bristol Bay Area Plan.

Thank you for considering my comments.

Sincerely,

Sharon Thompson

Comment 441 of 497 - submitted on 03/18/2013 at 12:00 AM:
RESOLUTION 2013-11

A resolution supporting the Citizen's Alternative Bristol Bay Area Plan and requesting public meetings in Bristol Bay.

WHEREAS, The Curyung Tribal Council is the federally recognized Alaska Native tribe serving its tribal members and the community of Eillingham; and

WHEREAS, The Curyung Tribal Council, acting as the duly elected governing body pursuant to the Constitution of the Curyung Tribal Council, has the authority to establish relationships and enter into contracts; and

WHEREAS, Our tribes, sportsmen, and commercial fishermen have made every attempt to work with the State regarding our concerns. DNR did no consultation with Bristol Bay residents, tribes, local governments, commercial fishing groups, or others before drafting the proposed changes to the plan

WHEREAS, Plaintiffs, Nondalton Tribal Council, Koliganek Tribal Council, New Stuyahok Traditional Council, Ekwok Village Council, Levelock Village Council, Curyung Tribal Council, the Alaska Independent Fishermen's Marketing Association, and Trout Unlimited brought suit against the State of Alaska, Department of Natural Resources based on Nine Causes of Action, in order to restore land use classifications that protect fish and game habitat and public uses of fish and game in the Nushagak/Kvichak Drainages; and

WHEREAS, After settling the lawsuit, the Department of Natural Resources is proposing to classify as habitat □

(1) 64 streams closed to new mining claims in 1984 by Mineral Closing Order 393 to protect salmon habitat, including the North and South Fork of the Kaktuli River, the Upper Talarik River, and eight streams to south of Pebble block,

(2) navigable anadromous waters in their entirety, including the South Fork of the Kaktuli River to Frying Pan Lake;

(3) moose calving and some wintering areas to include the North and South Forks of the Kaktuli west of Pebble block;

(4) Western Iliamna Lake which is downstream from the Pebble deposit; and

(5) the Lower Talarik Creek Special Use Area which is south of the Pebble deposit; and

WHEREAS, The Department of Natural Resources has-

(1) declined to establish a Subsistence land classification category comparable to the recreation category;

(2) declined to classify non-navigable anadromous waters as habitat;

(3) declined to classify much of the moose wintering areas as habitat; and

(4) declined to classify caribou calving and wintering areas as habitat; and

WHEREAS, The Curyung Tribal Council expects that the Department of Natural Resources will incorporate the other considerations of the Curyung Tribal Council in their 2013 Revised Bristol Bay Area Plan to include:

(1) Establishing a Subsistence land classification category

(2) Classifying as habitat those anadromous waters designated as important in the Anadromous Waters Catalog regardless of whether they are navigable or not

(3) Classifying as habitat the moose wintering and caribou wintering areas in the Nushagak and Kvichak drainages

(4) Increasing Habitat Classifications for wildlife and fish

(5) Prohibiting metallic sulfide mines in the Nushagak and Kvichak drainages

- (6) Approving a new mineral closing order that would ban new mining claims on or along salmon spawning streams threatened by mining
- (7) Encouraging Voluntary Cooperative Planning
- (8) Providing for water level protections for fish as they were in the 1984 plan such that in Bristol Bay we automatically reserve water for fish. If you want to take water out, you have to prove no harm to fish
- (9) Creating a Bristol Bay Advisory Board for the Nushagak/Kvichak Drainages
- (10) Operating under a "Precautionary Principle" as it was adopted by the Alaska Board of Fisheries, i.e. "If you don't know, err on the side of caution"
- (11) Operating under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise by those who wish to use it.

NOW THEREFORE BE IT RESOLVED that the Curyung Tribal Council requests that the Department of Natural Resources incorporate all matters specified above in their 2013 Revised Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Curyung Tribal Council supports the Citizen's Alternative Draft Bristol Bay Area Plan; and

BE IT FURTHER RESOLVED that the Curyung Tribal Council requests that the Department of Natural Resources join with the tribal councils in holding public meetings in the villages that sued DNR as soon as possible, and in other communities.

Adopted this 12 day of March, 2013.

Comment 442 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving

grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 443 of 497 - submitted on 04/19/2013 at 12:00 AM:

I'm representing the tribal government of Aleknagik Traditional Council; we as a tribal government would like to ask DNR to either re-implement the 1984 BBAP to recognize the habitat area of conservation of our natural resources such as the salmon, caribou, and moose or consider the revised 2013 Citizen's Bristol Bay area Plan. In the 2005 DNR had designated this area as for general use which would include any large scale resource developments.

We are the original people of this land and have used this land to hunt, subsist fish, collect our berries and to keep our traditional way of life. Community members of Aleknagik have often traveled long distances for subsistence purposes; for example many residents travel to the Iliamna area when the caribou migrate over to that area.

My co-worker has worked with Carol Anne Woody's team to collect information on the salmon streams to further protect and add the streams into ADF&G's anadromous salmon streams catalog for protection. On the North Fork of the Talarik River it has been noted that even if certain parts of the river dries up the Coho still redds within that area. The waters are still viable and juvenile cohos are present there due to the ground water being present in that area. When it dries up DNR considers this as a non-navigable part of the river. But, when spring arrives it gets replenished from the melting snow; revitalizing the dry section of the river, allowing the hatchlings to swim back to the main part of the river system to grow and eventually migrate downstream to the ocean to feed off the oceans nutrients needed for growth, and return as adult cohos to spawn and continue the cycle.

We have used and will continue to use this land as our "store" to provide spiritual nourishment to our families, so this area needs to be protected and set aside for future generation to enjoy as we have done so.

Thank You for your time

Comment 444 of 497 - submitted on 04/29/2013 at 09:41 AM:

I support the Citizens Alternative plan.

Comment 445 of 497 - submitted on 05/03/2013 at 02:05 PM:

Please do not allow mining in this area it is to fragile and beautiful to be destroyed for monetary gain. I grew up in Naknek Alaska and its not like everywhere else and the people do not want it to be. There are not many places left where you can live a subsistence type of lifestyle and enjoy the beauty of wildlife, we would like to keep this beauty and life alive and do not want to risk or chance it for minerals. It is not in the best interest of Alaska its land nor its people,

Comment 446 of 497 - submitted on 05/03/2013 at 07:07 PM:

I support The Citizens Alternative Plan. I am a lifelong resident of the Bristol bay region. I commercial fish for sockeye in the summer, out of Naknek. Large scale mining operations and foreign corporate interests have no place in this region. They do not have the interest of the people and ecology in mind, nor do they assume and summarize the proper image that is Alaska. Bristol Bay is a valuable and unique space on earth that requires protection. Thank you.

Comment 447 of 497 - submitted on 04/26/2013 at 12:00 AM:

I am from Manokotak.

My family relies on the lands and waters of Bristol Bay for many resources. From the lands we hunt moose, caribou, rabbit, and porcupine. We collect blueberries, salmonberries, black berries, red berries and high bush cranberries. We use several types of greens, fiddle head ferns and wild celery. From the air we take all kinds of birds. And from the waters, we take king, red, pink and silver salmon as well as pike and white fish.

We use these species to survive and eat. I show my grandchildren how to prepare and preserve these resources so they can sustain us through the year. These foods are better than anything we can buy at the store. They are natural and free of preservatives. In the tradition of my culture, we eat what we hunt or collect.

For these species to remain healthy and feed my family, our lands and waters must stay clean.

Please Amend the Bristol Bay Area Plan to better protect the subsistence resources that my family relies on for food. Protect more state land and designate all salmon streams as habitat. Create an Area Plan that reflects the values of the people who live in Bristol Bay and that will sustain our subsistence lifestyle for our children and grandchildren.

Thank You

Comment 448 of 497 - submitted on 05/02/2013 at 08:53 AM:

I support adopting the Citizens Alternative Bristol Bay Area Plan as the land use plan for Bristol Bay. Bristol Bay is the largest salmon producing area remaining in the world. The primary use of Bristol Bay should be fish and wildlife production. There is no scientific support for the claim that fisheries production and heavy metals mining can coexist. It is irresponsible to sacrifice portions of the worlds greatest salmon fishery for the short benefit of foreign mine owners with very little return to the state.

Comment 449 of 497 - submitted on 05/05/2013 at 12:00 AM:

Attached is a pdf of the Citizens' Alternative Bristol Bay Area Plan dated May 2013. This plan represents the comments of the Nondalton Tribal Council, New Koliganek Village Council, New Stuyahok Traditional Council, Ekwok Village Council, Curyung Tribal Council, Levelock Village Council, Trout Unlimited and the Alaska Independent Fishermen's Marketing Association. The Nushagak-Mulchatna Watershed Council and the Bristol Bay Heritage Land Trust also endorse this Citizens' Alternative.

Also attached is an excel workbook that is a summary of the management unit classifications recommended for regions 5 through 10 in the Citizens' Alternative Bristol Bay Area Plan.

A hard copy of the Citizens' Alternative Bristol Bay Area Plan will also be delivered to you.

If you have any questions please contact me at this email, or call.

Comment 450 of 497 - submitted on 05/05/2013 at 12:00 AM:

I am writing on behalf of the Board of Directors of the Bristol Bay Heritage Land Trust (BBHLT) to provide comments to the State on the Bristol Bay Area Plan (BBAP). As you know BBHLT is a principle contributor to the local effort to provide your agency with a thoroughly researched alternative to the existing BBAP. That alternative, called the Citizen's Alternative Bristol Bay Area Plan, more closely represents the actual uses of State land today and captures the vision shared by most people who live in the region. BBHLT recommends DNR give serious consideration to the recommendations contained in the Citizens' Alternative. Failure to do so may lead to an uncomfortable impasse and erode even further the lack of confidence the people of the region have in their State government.

Rather than comment generally on the BBAP or the Citizens' Alternative I would like to focus my comments on two specific topics: 1. The classification of four areas as Mineral (Mi), in particular the classification of Management Unit R06-36 to which I spoke at the public hearing in Koliganek, and 2. The general policy of the BBAP regarding instream flow reservations.

1. Management Unit R06-36, Kemuk, 108,390 Acres.

The 1984 BBAP co-classified several areas in Region 6 of the Nushagak River Watershed as Habitat and Mineral. The 2005 BBAP removed these co-classifications and reclassified four management units as solely Mineral (Mi) □ Pebble, Sleitat, Shotgun and Kemuk. This reclassification was not justified by the evidence available in 2005 and does not stand up to the evidence submitted with the Citizens' Alternative that demonstrates these areas still contain essential habitat for moose, caribou and salmon and are heavily used for subsistence and recreation. At a minimum these four areas warrant co-classifications with Habitat (Ha).

However, BBHLT endorses the position of the Citizens' Alternative that classifying or co-classifying any of these areas as Mineral (Mi) is premature and is likely an illegally presumptive determination. According to 11 AAC 55.130 mineral land is "land where known mineral resources exist and where development is occurring or is reasonably likely to occur, or where there is reason to believe that commercial quantities of minerals exist." (Emphasis added). Development has not been permitted in any of these management units and none of the companies exploring in these units has demonstrated that development is reasonably likely to occur. The commercial viability of any mineral deposit is not certain until permit applications have been filed and granted. Because all state lands are open to mineral claim and exploration the Mineral (Mi) classification is redundant. State land should become mineral land (Mi) only upon the approval of permits to develop and approval of a petition for a plan amendment to reclassify the land to be mined to mineral only. Until such time the land should be classified to reflect how the land is being used. In all of these cases that use remains Habitat (Ha).

The Kemuk unit, R06-36, is a case in point that demonstrates the inappropriate and premature use of the Mineral (Mi) classification. The Kemuk deposit is described on page 3-93 of the 2005 BBAP as being in "an area of extensive surficial deposits with few conspicuous topographic features. Buried below 90 to 140 feet of unconsolidated Quarternary deposits, the deposit consists of a large, composite ultramafic and mafic pluton." In plain English this sentence says the deposit is in a very flat area and there is at least 90 to 140 feet of overburden to penetrate before bedrock is reached. What is not stated but is obvious upon visual observation is that the Kemuk claim block is in a huge wet area close to the main stems of the Nushagak and Nuyakuk Rivers at an elevation barely 10 feet, if that, above the surface of these rivers. Even if a Pebble size deposit was found at Kemuk developing it would require feats of hydrologic engineering to deflect these massive rivers that, even if possible, would likely render the deposit uneconomic. Despite these obvious challenges, the management intent language says this unit "is to be managed for the exploration and development of mineral deposits."

All state lands are subject to mineral claims and accordingly are managed for the exploration of mineral deposits. Therefore, a Mineral (Mi) classification is not justified solely by the existence of a deposit that warrants exploration. As noted above a Mineral (Mi) classification is justified only if there is a reasonable likelihood that development will occur or if there is reason to believe commercial quantities of a mineral exist. In fact, the active exploration of Kemuk and the expansion of claims in this area did not begin until after the 2005 BBAP was adopted. It was not known in 2005 whether the deposit could be mined and whether commercial quantities of a mineral existed. Kemuk falls far short of this threshold and it was premature to give this area a Mineral (Mi) classification.

In contrast, there is a wealth of information to support designating the highest and best use of this land as Habitat (Ha) and, as recommended by the Citizens' Alternative, managing land in this unit for the protection of fish and wildlife resources. Data from ADF&G suggests this unit contains "essential" habitat for moose, caribou and salmon. Moose winter in over 50% of the unit, caribou calve and winter in over 40% of the unit and anadromous fish are recorded in more than 75 miles of streams that flow through the unit. In 2011, just prior to exploration of claims in this unit by Millrock Resources, Inc. BBHLT surveyed streams in the unit and added 68 of the miles now recorded in the Anadromous Waters Catalog. A summary map of this survey follows:

Map included here.

This map contains another feature indicating the importance of the area for fish and wildlife. Koliganek Natives LTD village corporation selected as much of the corridor of Napatoli Creek as possible to protect its natural resources □ primarily moose. Residents of the village hunt Napatoli creek for moose in the winter and fish at its mouth for salmon in the summer.

In summary, BBHLT recommends removing the Mineral (Mi) classification from management unit R06-31. The Mineral (Mi) classification should also be removed from units R06-03 (Shotgun), R06-18 (Sleitat), R06-23 (Pebble) and R06-24 (Pebble Streams) for the same reasons. All of these units should be reclassified to reflect their current use and value as Habitat (Ha), Public Recreation (Rd), Water Resources (Wr) and Subsistence (Su) as recommended in the Citizens' □ Alternative Bristol Bay Area Plan.

2. Policy of Bristol Bay Area Plan on Instream Flow Reservations

The Department of Natural Resources adopted the following as part of the 1984 Bristol Bay Area Plan:

Except for public water supply and domestic use, the maintenance of fish stocks is generally the highest priority water use in the [Bristol Bay] study area. Therefore, the DNR will not allow an appropriation of water to cause the instream flow of any waterbody in the planning area to fall below the amount determined necessary by ADF&G and/or USFWS to protect fish habitat and production and waterfowl habitat, unless, under the procedures outlined in AS 46.15.080, the Commissioner of DNR makes a finding based on public review that the competing use of water is in the best public interest and that no feasible and prudent alternative exists.

Under the 1984 Bristol Bay Area Plan the duty was placed on ADF&G to make determinations of instream flow requirements for fish and waterfowl before applications for appropriations of water for private use could be adjudicated.

In 2005 DNR changed the Bristol Bay Area Plan and relieved ADF&G of this duty. Instream flow reservations were consigned to the system we have today at AS 46.14.145 that requires an affirmative application by a government agency or person in the form of an application to establish a reservation for such common uses as fish and wildlife, recreation, water quality or navigation. Now, in Bristol Bay, if ADF&G chooses not to affirmatively apply for an instream flow reservation in a river system whose water may be needed for a private appropriation, there is effectively no one other than a private person to stand in for these common uses of water.

Almost contemporaneously with the public release of DNR's proposed amendments to the 2005 BBAP, the Governor and DNR introduced the permit reform bill (now HB 77) to eliminate even this sliver of instream flow protection. Without the vigilance of private parties like BBHLT and various tribes in Bristol Bay the removal of private parties from the law for filing instream flow reservations puts fish at great risk. BBHLT has raised more than one million dollars to support data collection for pending instream flow reservations on the Koktuli River, the Stuyahok River, the Mulchatna River and Kaskanak Creek. For this reason, BBHLT supports the recommendation of the Citizens' Alternative that the protection afforded to instream flow in 1984 by the language quoted above be restored to the Bristol Bay Area Plan

Sincerely

Attached Map - Fish Survey Results - August 2011 Nushagak/Nuyakuk River Tributaries - Kemuk Mountain Area

Comment 451 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in a meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 452 of 497 - submitted on 05/06/2013 at 12:00 AM:

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working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 453 of 497 - submitted on 05/02/2013 at 10:51 AM:

I support the Citizens Alternative. This area is a vital and sustainable natural resource area and should not be risked in any way for short-term material gain.

Comment 454 of 497 - submitted on 05/02/2013 at 12:00 AM:

I urge you to adopt the citizen's Alternative Plan for Bristol Bay.

Comment 455 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are

the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 457 of 497 - submitted on 04/24/2013 at 09:33 AM:

I have reviewed the State's 2005 Bristol Bay Area Plan and the proposed amendments. I would recommend the State consider a broader approach to the Bristol Bay Area Plan. I have also reviewed the Citizens' Alternative Bristol Bay Area Plan, and I endorse its approach for managing state lands. The State's plan places too little emphasis on recreational fishing and protecting the rivers, streams and lakes that support this established multi-million dollar segment of Bristol Bay's local economy. The Citizen's Alternative, while not perfect, does a much better job of addressing the reasons why I (live and work in,) Bristol Bay.

Comment 458 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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Comment 459 of 497 - submitted on 03/29/2013 at 12:00 AM:

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Comment 461 of 497 - submitted on 05/06/2013 at 12:00 AM:

United Fishermen of Alaska is the largest statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and its offshore federal waters. The single largest salmon fishery in Alaska is the Bristol Bay sockeye salmon fishery, comprised of set and drift gillnet gear types. Altogether, these Bristol Bay salmon fisheries supported 1,488 active Alaska resident and 1,340 non-resident permit holders in 2012, generated ex-vessel value of \$121 million. Each of these represents an independent, mostly family-owned small business, that also employ crew members and support the economies of Alaska and U.S. communities. The importance of the Bristol Bay salmon fishery to future generations should not be compromised by relatively short term benefits of non-renewable extraction activities.

UFA offers the following comments on the Public Review Draft (PRD) of the Determination of Reclassification and Plan Amendment to the 2005 Bristol Bay Area Plan.

The plan describes Alaska regulation 11 AAC 55.230 which classifies Wildlife Habitat Land as "land which is primarily valuable for:

1. fish and wildlife resource production, whether existing or through habitat manipulation, to supply sufficient numbers or diversity of species to support commercial, recreational, or traditional uses on an optimum sustained yield basis; or
2. a unique or rare assemblage of a single or multiple species of regional, state, or national significance."

We believe that there is very little land in the Bristol Bay area that would not fit in both these definitions, based on the importance of all waters in the Bristol Bay area to the world's largest sockeye salmon runs that originate in the area's waters.

UFA recommends that the entire reach of all anadromous streams in Bristol Bay should be protected through classification as wildlife habitat land. Navigability should not be a factor in whether or not an anadromous stream is classified as wildlife habitat, as it is irrelevant to the ability of fish to use these waters. Also, the reliance on the anadromous waters catalog is also not completely reliable or accurate in assessing whether waters are important to salmon populations. It is well known that most biological surveys of fish bearing waters occur in the summer months, and would be lacking in capability to assess the utilization of upstream remote waters during other times of year.

A current Fish and Game website notes: "Although the database contains about 16,000 bodies of water across Alaska, it is believed that this number represents less than 50 percent of the streams, rivers, and lakes actually used by anadromous species." (Where The Fish Are - The Fish Distribution Database http://www.adfg.alaska.gov/index.cfm?adfg=wildlifeneews.view_article&articles_id=186)

UFA also supports reestablishing the system used in the 1984 plan that automatically reserved water levels for fish upholding the standard that if someone wants to remove water from a stream they must prove no harm to fish.

UFA supports a precautionary approach when making land management decisions with potential impacts on water and fisheries values, as adopted by the Alaska Board of Fisheries in the State's Policy for management of sustainable salmon fisheries (5 AAC 39.222):

(5) in the face of uncertainty, salmon stocks, fisheries, artificial propagation, and essential habitats shall be managed conservatively as follows: (A) a precautionary approach, involving the application of prudent foresight that takes into account the uncertainties in salmon fisheries and habitat management, the biological, social, cultural, and economic risks, and the need to take action with incomplete knowledge, should be applied to the regulation and control of harvest and other human-induced sources of salmon mortality&

Considering the extent and value of the Bristol Bay salmon fishery, we should err on the side of caution.

UFA supports the mandate that DNR Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.

Thank you for your consideration of our comments.

Sincerely

Comment 462 of 497 - submitted on 04/29/2013 at 09:38 PM:
KEEP BRISTOL BAY PRESTINE !!!!!

Comment 463 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

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Sincerely

Comment 464 of 497 - submitted on 05/07/2013 at 12:00 AM:

Thanks for the opportunity to comment on the Bristol Bay Area Plan.

I note that you state that the reason the plan is being revised is that the old plan is out-of-date, and was written to reflect the values and attitudes of the local people when it was written. You go on to explain why the revisions are necessary, but leave out any mention of the current values and attitudes of the local people, and it seems to me that this should be the overriding reason to develop this plan. Thus far, the public meetings and receipt of public comment appears to simply meet agency planning requirements, rather than actually being listened to.

The plan seems to be written to facilitate the development, with special emphasis on mineral development, of the plan area. It seems to be written by the same authors of the recent federal Bureau of Land Management Bristol Bay Plan, which received strong public opposition from local communities. By a strong majority, local people want the natural values of the planning area protected.

I ask you to revise the plan to increase the level of protection from development, with special emphasis on mineral development, of the state lands covered by this plan. Please restore the previous habitat classification designed to allow a continuation of subsistence lifestyle by local residents. Protection of the ecological values of these lands has both immediate and long-term benefits to most Alaskans, while area development helps a small fraction of the people.

Thanks for listening

Comment 465 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

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- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining

- Use voluntary cooperative planning

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
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Sincerely

We the people of Bristol Bay love our land & water.

Comment 470 of 497 - submitted on 04/30/2013 at 11:03 AM:

Please protect Bristol Bay land and water! If anything it should go back to the old 1984 Land protection. We use all the land. The animals use all the land. They live on the land, we live on the land. I've hunted my whole life. I have fished my whole life. And i want the same for my kids also. Where would the animals live in the winters and summers if the land is destroyed forever. Huge chunks of land changed... Not for the good but for the bad. Sadness fills my heart and many others that think the land could possibly be destroyed for good. Please protect Bristol Bay land and water!(yes like i said in the beginning.. To remind you)Have A catagory for subsistence living. Protect the land for the people. Not just the people but for the animals and plants. Years ago Indians from the lower 48 came to Alaska during AFN to talk about their land and what mining did to it. They showed before and after pictures and it was horrible and saddening. They said "do whatever you can to stop the pebble mine from destroying the land, protect it."

Comment 471 of 497 - submitted on 03/26/2013 at 12:00 AM:

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Sincerely

Comment 472 of 497 - submitted on 05/06/2013 at 12:00 AM:

I am from the village of Clark's Point, born and raise there in Bristol Bay I'm 59 yrs old and ever since I was 6 years old been going out commercial fishing with my father and brothers every year and too I do have my own boat/permit which this is my livelihood along with being a subsistence user both my wife and childrens we live off our lands hunting and picking berries both all the way up Nushagak river and the most important concern is our wild salmon and where the State want to allow mining at the head waters of our Bristol Bay Region that I would like for DNR please do not allow mining which will ruin the salmon and their habitat areas if there may be a leakage from the tailing pond would have a bad affect to our salmons.

Comment 473 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 474 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).

DRAFT ACTION ALERT to be sent to ALASKA RESIDENTS April 26, 2013

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Sincerely

Comment 475 of 497 - submitted on 04/06/2013 at 12:00 AM:

I am a resident of the Bristol Bay watershed area; I was born and raised here. As a resident, as a commercial fisherman, and as an Alaska Native subsistence user, I have some deep concerns over the DNR Bristol Bay Area Plan.

It is my understanding that the DNR 2005 BBAP reclassifications drastically reduced the fish and game habitat. I find the trend towards reducing the fish and game habitat classifications very alarming. The criteria used to designate habitat in the

2005 BBAP does not make sense. For example, why would nonnavigable waters get excluded when determining what areas qualify as sensitive habitat?

Reducing the fish and wildlife habitat designations is not in the best interest for those of us who have lived off the bounty of this area for both subsistence and commercial use. I strongly advocate for throwing out the 2005 BBAP that the 2013 rewrite is based on and implementing the Citizens' Alternative Bristol Bay Area Plan.

We all benefit from the fish and game that come out of the water and off of the land. The state should protect local citizens by ensuring the habitat is protected for generations to come. It is backwards that citizens should have to prove our natural resources need protection. It is not in the best interest of current or future generations.

Sincerely

Comment 476 of 497 - submitted on 03/18/2013 at 12:00 AM:

My family and I have fished in Alaska (Cook Inlet, Bristol Bay, Kodiak) for 35 years.

I find it inconceivable that we would not do everything in our power to protect the wilderness and salmon streams of Bristol Bay. It is a planetary treasure that should not be squandered in any way.

Therefore, regarding the 2005 BBAP, I fully support re-classification of the streams as Wildlife Habitat, as well as any and all means to put salmon spawning streams at the highest priority.

Thank you for your consideration.

Comment 477 of 497 - submitted on 05/01/2013 at 11:09 AM:

After reading the 2005 Bristol Bay Area Plan, I am disturbed that it does not contain enough language that protects the land itself: rivers, forest, that we rely on for work and pleasure. The land needs protection forever, for my children and theirs, and theirs. This should be the top priority when considering the land usage--this is what will be our legacy.

I strongly support the Citizens Alternative BB Plan.

Thanks for your consideration.

Chris White

Comment 478 of 497 - submitted on 04/30/2013 at 04:13 PM:

As an Alaska resident since 1954, I have enjoyed the pristine quality of the air and water. As a family, we have had recreation trips to many areas of Alaska.

Having viewed a number of pictures of copper mining and tailing piles in other areas and mining in other countries, I do not want mining ventures in Alaska to destroy spawning and wildlife wetland for short term gain. The Bristol Bay area has produced food sources and fishing income sources for many generations of Alaska residents.

Gloria L. White

Comment 479 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining

- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 480 of 497 - submitted on 04/30/2013 at 03:05 PM:

This Pebble Partnership is another London based conglomerate who have been exploiting the World's people and their Resources from the time of Capt. Cook. In the olden days, they lobbed a few cannon shells into the villages to secure domination, but today that approach is now met with non-truths and exaggerated promises and when the last shovel is turned, all will be well, when in fact they will be long gone and besides they don't live there anyway, and like others before them, don't really care.

I fear at the present time there is a climate in Juneau that is so Development Oriented and Beholden to so called Big Business that they will sanction this disaster. SS/ Stewart E White

Comment 481 of 497 - submitted on 05/02/2013 at 06:57 PM:

I am writing to provide comment of the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. As an Alaskan resident, I'm dissappointed in the failure of the DNR to effectively consult with the people of Alaska when so many changes were made to the Bristol Bay Area Plan. The 1984 BBAP was a result of collaboration between the State, tribes and local residents of Bristol Bay to provide the best future for the area based on everyone's knowledge of the resources. As far as I can see, the only thing that has changed since that time is that a large mine now wants to be in the area as well. The way the DNR has gone about the process without putting much effort into involving the public through adequate notices or that they even wanted to make such drastic changes to the BBAP without consultation from the local tribes, governments, and sport and commercial fishing groups tells me that the DNR gives preferece to mine companies over the State's own people.

The recent revisions to the BBAP released by the DNR in early 2013 provide inadequate protection for the Bristol Bay region for many reasons. That is why I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes commercial and sport fishermen and a various other Bristol Bay business interests. The bulleted items below are just highlights of some of the many things that the CABBAP recommends the DNR include as additional revisions in the 2013 Bristol Bay Area Plan:

I Reestablish the system used in 1984 plan that automatically reserved water levels for fish and if anyone proposes to remove water from a stream, they will first have to prove there will be no harm to fish.

I Increase habitat classifications for wildlife and fish. The system used to reclassify land in the 2005 plan was seriously flawed and drastically reduced the amount of land classified as habitat. This is where local knowledge can be extremely important if only the DNR is willing to use it.

I Operated under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.

I Include subsistence as a criteria when classifying land. Areas that are of high value to residents for subsistence should be classified as such and be protected. Local residents of Bristol Bay value their subsistence way of living provided by the fish, wildlife and land and they should have the right to choose this lifestyle and pass on their culture to their children.

I The DNR should use the same precautionary principle when making land management decisions as used by the Alaska Board of Fisheries: If you don't know the outcomes of your actions, err on the side of caution.

I Create a Bristol Bay Advisory Board made up of local residents and use cooperative voluntary planning.

I Create and implement a new Mineral Closing Order that would prohibit new mining claims on salmon spawning streams.

I Prohibit metallic sulfide mines in the Nusagak and Kvichak drainages. The importance of these drainages to salmon, wildlife and the people and economy of Alaska means that this is NOT the place for a metallic sulfide mine that could potentially damage and destroy them is something goes wrong. No one in the mining industry can guarantee that there will never be an accident, that is why they are called accidents.

I look forward to the chance for the people of Alaska, specifically those from Bristol Bay, to be included in their own land management plan. Once again, I support the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan.

Sincerely,

Dawn Wilburn

Comment 482 of 497 - submitted on 04/16/2013 at 12:00 AM:

I CARE ABOUT THE FUTURE OF BRISTOL BAY'S FISH AND FAMILIES.

PLEASE, PROTECT THEM!

Comment 483 of 497 - submitted on 05/03/2013 at 12:00 AM:

Nunamta Aulukestai is a consortium of 10 Alaska Native Claims Settlement Act Village Corporations and 10 Federally Recognized Tribal Governments. Nunamta advocates for approximately 6,014 tribal members and 4,775 shareholders from the Bristol Bay region who rely on the land, fish, wildlife, cultural resources and waters of the region for subsistence and their cultural way of life. Since its founding in 2006, Nunamta has actively advocated to protect the natural resources of Bristol Bay from the threats to those resources, namely offshore oil and gas development in Bristol Bay and the proposed Pebble Mine.

In general, Nunamta Aulukestai does not consider the 2005 BBAP sufficiently protective of the waters and natural resources of our watershed. The 2005 BBAP represents a significant and unjustified departure from the original 1984 BBAP. Unlike other area plan changes undertaken by DNR, the 2005 BBAP does not start with the previous plan as a foundation. Rather, the 2005 BBAP effectively ignores the 1984 BBAP by changing the emphasis from protecting habitat for fish and wildlife, salmon in particular, to a plan intended to foster mineral development. The proposed 2013 amendments, while providing more habitat protections, do not restore the foundation of stewardship that was fundamental to the 1984 BBAP. For that reason, Nunamta Aulukestai recommends the Department discard the 2005 BBAP in its entirety and start over. To assist with that effort the people of the region have prepared a Citizens' Alternative BBAP. A copy of that plan has been submitted to you. Nunamta Aulukestai strongly urges the State to take this alternative plan seriously and consider it in the spirit of cooperation in which it is offered.

The Department is now well aware the people of the Nushagak River watershed do not support the 2005 BBAP. The comments received during public hearings in the communities of the watershed clearly indicate a desire for a plan that protects habitat, protects subsistence, protects water quality, protects salmon and is responsive to the input from the people who live here. Rather than repeat those comments, let it be enough to say the Nunamta Aulukestai generally endorses them.

Land Classifications:

Now to the classification of land in Alaska and all state planning documents are important because land classifications represent management intent, and some classifications can limit how the land is treated. For example, land classified as Wildlife Habitat cannot be selected for municipal entitlement. Our members and many of the residents in the region believe that there needs to be a separate subsistence classification. Shame on the State that our use of land to provide food on the dinner table whether you live in Anchorage or in Portage Creek is through the land classification of Wildlife

Habitat. While we recognize that municipal selections are granted entitlements, we believe that residents who live in Aleknagik or in the Lake and Peninsula Borough, still rely on the subsistence for providing for their family. That economic benefit is not recognized in this plan. Yet, because we ask for protections under "subsistence" our only recourse is through a habitat classification which then hamper the municipal selections. The State of Alaska can fix that through the development of administrative regulations and a designation for subsistence.

Regarding changes in from the 1984 plan that had 3 designated land classification, habitat, recreational and mineral which required the state to balance uses and not harm one over the other. Moving into the 2005 BBAP, the State moved toward a mineral only classification that gave mining companies more weight over the residence who used these lands for to provide food on their table. Bristol Bay people saw the state remove the habitat classification to over 10 million acres. And a gain of 9.4 million acres to mining or oil and gas with that being the sole designation. Forget anything about compatibility with other uses such as food for our dinner table or recreation.

In Region 6 Management Unit 36 the area around Kemuk Mountain - this is used by local people from Koliganek, New Stuyahok and Ekwok for hunting and fishing yet it only contains a designation solely for Mineral purposes. We believe the State errors with the implementation of AS 38.04.005 when the State bases a classification on one type rather than thoroughly analyzing the unit for its value to local people and recreational users.

In Region 6 Management Unit 03 Shotgun Near the King Salmon River - this is a known area of moose calving and brown bear denning. This unit is designated solely for Mineral purposes. We believe the State errors with the implementation of AS 38.04.005 when the State bases a classification on one type rather than thoroughly analyzing the unit for its value to local people and recreational users.

In Region 6 Management Unit 18 Sleitat Mountain. The State's own data reflects this area contains brown bear denning. This unit is designated solely for Mineral purposes. We believe the State errors with the implementation of AS 38.04.005 when the State bases a classification on one type rather than thoroughly analyzing the unit for its value to local people and recreational users.

In Region 6 Management Unit 23 and 24 Pebble. The site supports anadromous fish, it's known caribou calving area, resident fish, moose wintering and calving and prime caribou habitat. This unit is designated solely for Mineral purposes. We believe the State errors with the implementation of AS 38.04.005 when the State bases a classification on one type rather than thoroughly analyzing the unit for its value to local people and recreational users.

The state's proposed revisions to the 2005 BBAP does not adequately protect wild game, salmon, subsistence, recreation, sport fishing, or other public uses of land, fish, and game.

The State of Alaska should review the latest Anadromous Fish Catalogue and include the latest additions into the Mineral Closing Order that would ban new mining claims on or along salmon spawning streams. For us this is a line in the sand, that if our elected politicians spout a "fish first" or "will not trade fish for a mine," then where there are documented streams with fish in them, they need to be protected as habitat as the primary classification. Bristol Bay is known for its "wild salmon populations" and we should protect that no different than late Governor Hammond did in 1972 by establishing the Bristol Bay Fisheries Reserve.

It is Nunamta's belief that DNR did not strike a balance in 2005 BBAP between various stakeholder interests, and further amendments are necessary. This planning document is in our opinion, "one sided that favors the mining industry" over the voices of residence in Bristol Bay. We urge the State of Alaska to fully incorporate the Citizens' Alternative in the revised 2013 Bristol Bay Area Plan.

Sincerely

Comment 484 of 497 - submitted on 04/02/2013 at 12:00 AM:

Once again, I will try to express my concerns about ??? Fisheries & Pebble Mine and I hope & Pray that you would understand me. I know you are from Outer State, and here I am, born & raised in Alaska, & nearly 80 yrs young. Many people, come from Outer State, do not have any idea, how it was for us, in the early years, of Alaska. We lived very isolated. We depended very much on our land. We lived on all of our wild game & fish, & berries. There wasn't any grocery stores around. All of our groceries were brought from the Cannery, right after the fishing season. Our family had a large cellar, where our groceries were kept. 40 cases canned milk, all of the canned fruits & vegetables 2 cases each 24 or 48 cans to a case. Eggs, potatoes, onions, oranges, apples were in crates. We would have barrels of Salt Meats slabs of bacon, 100# bags flour & sugar. These groceries had to last a whole year. We depended a lot on subsistence. We would get out wild ducks, greese Spruce hen, ptarmigan, plus the seagull eggs in the summer.

Winter we would always have moose, beaver, porcupine. Back in those days caribou were very scars. Everything off the land we would use. And this is the kind of life I am use to.

I am deathly afraid of Pebble Mine. Fishing been around for 100s of years. My grandfather came over from Norway & started fishing in the 1800s hundreds. My father came from Denmark early 1900 hundreds. My whole family depend on fishing Bristol Bay. I raised my family in fish. Commercial fish I've done for 51 years. Salmon is very important to me. We cannot allow Pebble Mine to build in that area. That area is the spawning grounds for our salmon. If you care for the people of Bristol Bay, you will not allow this to happen.

Our moose & caribou use this land, its their habitat. My papa had his trapping cabin on the Lower Talarik Creek. And spent many years trapping out of that area. This is prime habitat for the moose & caribou, and spawning grounds for our salmon. Which gave us income for many many years. Please protect our salmon as the state is for the habitat area on Izembek National Wildlife Refuge area.

For all of us against Pebble Mine. If the 1984 habitat plan was left alone, it would have been in our favor. 94% was taken away in the 2005 habitat plan.

I would like to invite you to come to Naknek for special meetings before a final decision is made. I have a couple of rooms. I would gladly put you up for as long as you would like to stay.

Best regards.

Comment 485 of 497 - submitted on 04/30/2013 at 01:09 PM:

I support the citizens initiative which is s more balance plan rather than the current plan which is bias to the mining industry.

Comment 486 of 497 - submitted on 03/29/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality

winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 487 of 497 - submitted on 05/03/2013 at 12:00 AM:

As an Alaskan resident, who lived in Bristol Bay for 14 yrs., I am writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan (BBAP). Revisions to the BBAP released in early 2013 fail to provide adequate protection for the Bristol Bay regions valuable, living renewable resources or for the people who use and rely on those resources. My Daughter, her husband, and my 4 Grandchildren still live there and fish commercially and for subsistence. I now have a Great Granddaughter there also, to further attest to my interest in this issue.

Therefore, I am writing to formally support the Citizen's Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay-based business interests. The Citizen's Alternative recommends that DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local resident.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries (this principle states that if you don't know what outcomes your actions might have, err on the side of caution).
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Salmon are the cornerstone of the region's economy and culture and the BBAP should include additional mineral closing orders so salmon streams documented after 1984 are classified as habitat.
- Classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I recommend the State of Alaska Department of Natural Resources incorporate the Citizen's Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan. Thank you.

Sincerely

Comment 488 of 497 - submitted on 05/06/2013 at 06:04 PM:

May 6, 2013

Re: Comments on the Bristol Bay Area Plan Amendment 2012

Dear Mr. Phelps and DNR Staff,

My name is Verner Wilson III and I was born and raised in Dillingham, have been a Bristol Bay salmon fisherman my entire life along with members of my family, am a Bristol Bay Native Corporation shareholder and Curyung Tribe member. Salmon is not just important for me for commercial reasons, but also for subsistence reasons. I am 27 years old and want to be able to go salmon fishing in Bristol Bay well into the future. I obtained an Environmental Studies Bachelor's degree from Brown University, and am very concerned about proposed mining in Bristol Bay and want to

express my concerns about the revised Bristol Bay Area Plan (BBAP) and potential large scale mining in my home-region.

Policy from your changes in 2005 to the BBAP resulted in a re-classification of land for the region, and paved the way for an unpopular project in Bristol Bay. While it is the mission statement of DNR to "responsibly develop Alaska's resources by making them available for maximum use and benefit consistent with the public interest," which is similar language to Article 8 Section 1 of Alaska's constitution, I do not believe that the Pebble project is in the public interest and there are public opinion polls to prove it. In 2012, the Bristol Bay Native Corporation conducted a statewide poll that shows 54% of Alaskans oppose the development of Pebble Mine, while only 32% support it (see http://www.bbnc.net/index.php?option=com_content&view=article&id=194:poll-shows-most-alaskans-oppose-proposed-pebble-mine-project&catid=36:news-a-events&Itemid=44). DNR and the Pebble Partnership have yet to prove that this project is in the public interest, and until that proof is shown, I believe you are not abiding by your own mission statement and the Alaska Constitution by designating state land at the Pebble deposit for mineral development. Further, 81% of my fellow Bristol Bay Native Corporation shareholders support protecting our region from the proposed Pebble Mine (see http://www.bbnc.net/images/stories/bbnc_pebble_results.pdf), as well as dozens of Alaska Native tribes and organizations. The Lake and Peninsula Borough has outlawed any sort of development that is the sheer size and magnitude of the proposed Pebble Mine through a citizen's initiative because of local concerns for the fishery. Many tribes, communities and regional organizations have passed resolutions opposing the proposed Pebble Mine. I hope that the State of Alaska and Department of Natural Resources hears us and that you take a proactive approach in protecting our fishery. One way to do this is to adopt the recommendations in the Citizens' Alternative BBAP.

First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 BBAP revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan. In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region. Further, the conduct in which the DNR has tried to fix the problems with the original 2005 BBAP is unacceptable. Public meeting notices released just a few days before they were scheduled did not allow enough time for people to prepare for the meetings. There were no copies of the BBAP to review, public comments were not recorded, and participants said that the presentation given by DNR staff were misleading and did not address their concerns. Even more insulting was that the state did not provide language translation for elders and other Alaska Natives who do not speak English.

In response, I am hoping that DNR will improve its outreach in the future so it is a little less insulting to your fellow Alaskans. I am also writing to formally support the Citizens' Alternative Bristol Bay Area Plan, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the CABBAP recommends DNR include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.
- Re-establish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution.
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for

wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

Your regulatory decision-making on this matter will have huge implications for our future. In 2010, the Pebble Partnership companies were found by the State of Alaska to have already violated their exploratory water-use permits, showing that even in the early stages of exploration, they could not even comply with DNR and the State of Alaska's exploratory regulations. What can we expect in the future if DNR and other government agencies give the necessary permits to Pebble to proceed with development, as a result from an inadequate Bristol Bay Area Plan?

I would like to point out a report from fisheries reporter Laine Welch and her findings on Bristol Bay's sockeye in July 2012. In her report, she states that Bristol Bay's sockeye are by far Alaska's most valuable salmon fishery; well over one-third (sometimes as much as half) of the state's total salmon fishing earnings come from Bristol Bay. The bay also has the most fishermen, with more than 2,800 salmon permit holders. The report can be found at: <http://www.adn.com/2012/07/15/2542740/bristol-bays-red-salmon-harvest.html#storylink=cpy>. Furthermore, the value of Bristol Bay salmon may increase over time as more consumers may prefer to consume more wild salmon for health reasons, as salmon is full of omega-3 fatty acids and protein, and is considered by many nutritionists as a super food. It is the responsibility of DNR to protect this fishery and to do that by adopting the recommendations of the Citizen's Alternative BBAP.

In conclusion, as someone who was born and raised in Bristol Bay, has been a Bristol Bay salmon fisherman my entire life along with members of my family, as a Bristol Bay Native Corporation shareholder and Curyung Tribe member, I hope DNR will adopt the recommendations of the Citizen's Alternative of the Bristol Bay Area Plan, and adopt better outreach plans in the future. Thank you for considering these comments.

Sincerely,

Verner Wilson III

P.O. Box 905

Dillingham, Alaska 99576

Telephone: 907-360-8591

E-mail: vernstor@yahoo.com

Comment 489 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents

- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise. Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 490 of 497 - submitted on 05/01/2013 at 04:39 PM:

I am very concerned over the Pebble Mine issue, and I'm asking the state to strongly consider the proposals contained in the "Citizen's Alternative Bristol Bay Area Plan for State Lands." We cannot allow Pebble to go into an area that is rich in fishing, tourism and wildlife and have some "ACCIDENT" happen. Alaska should have learned that lesson from the EXXON VALDEZ - never could have happened there either. And who is going to want to visit then. We would be forfeiting our beautiful state for a dirty hole in the ground so someone other than Alaska would profit. No amount of money can replace natural beauty.

I will continue to be against the Pebble mine and any organization that tries to "damage" our Alaska and its resources.

Respectfully submitted,

Susan Winton

Comment 491 of 497 - submitted on 04/01/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
- Use voluntary cooperative planning
- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution

- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise

Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 492 of 497 - submitted on 05/07/2013 at 02:03 PM:

Dr. Mr. Phelps,

My name is Gayla Woods and I am an Alaskan Native living in Dillingham, AK. I have traveled to a lot of the communities with you here in the Bristol Bay Area. The overall message that I have heard from all the communities and residents here in Dillingham is how important our subsistence lifestyle is to our people. A subsistence classification is also something very important to the people of Bristol Bay. Please take the time to review the Citizens Alternative Bristol Bay Area Plan. I am in support of the Citizens Alternative Bristol Bay Area Plan. Please listen to our people. Please listen to the residents of Bristol Bay. Please hear our plea for letting us have a part in this important area plan that is going to affect us who live here. We are the ones who live here and we are the ones who should give input on the decisions being made for Bristol Bay. I look forward to hearing what decisions are going to be made and I really hope a Bristol Bay Advisory Board is developed to make this plan a success. If you have any questions or would like to talk, my number is: 907-843-0838. -Gayla Woods

Comment 493 of 497 - submitted on 05/03/2013 at 12:00 AM:

The Nushagak Fish and Game Advisory Committee that operates under the Alaska Statute 16.05.260 would like to know if the Alaska Department of Fish and Game submitted comments for the 2005 Bristol Bay Area Plan. If so, were the comments or data submitted by the Alaska Department of Fish and Game considered before establishing the 2005 BBAP and are they available to the public?

The sole purpose of our Advisory Committee is to provide a local forum for fish and wildlife conservation and use, including matters relating to habitat. There are 82 committees throughout the state established under the Joint Board of Fisheries and Game, each with expertise in a particular local area. We have direct access to traditional knowledge of the region and local scientists that guide us to manage our resources properly. Considering our intellectual wisdom of the resources in Bristol Bay, we request to be involved in the planning process of the Bristol Bay Area Plan when it is revised every twenty years.

The Bristol Bay residents were disappointed with the 2005 BBAP revision process and felt that DNR did not adequately consult with our people and all user groups. In addition, the recent revisions to the BBAP released in early 2013 provide inadequate habitat classifications for the protection of our resources within the Bristol Bay region.

After analyzing scientific studies and listening to all user groups of the Nushagak watershed, the Nushagak Fish and Game Advisory Committee supports the Citizens Alternative Bristol Bay Area Plan (CABBAP), submitted by Bristol Bay area Alaska Native tribes, commercial and sport fishermen and a variety of Bristol Bay based business interests. Among other things the CABBAP recommends D.N.R. to include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish.
- Prohibit metallic sulfide mines in the Nushagak and Kvichak drainages.
- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining.
- Use voluntary cooperative planning.

- Reestablish the system used in the 1984 plan that automatically reserved water levels for fish and if someone wanted to take water out of a stream, they had to prove no harm to fish.
- Create a Bristol Bay Advisory Board made up of local residents.
- Implement the precautionary principle when making land management decisions as it was adopted by the Alaska Board of Fisheries. The principle states that if you don't know what outcomes your actions might have, err on the side of caution.
- Operate under the presumption that all waters in Bristol Bay are needed for salmon unless proven otherwise.
- Subsistence is the heartbeat of our culture in Bristol Bay and the Bristol Bay Area Plan needs to include subsistence as criteria for land use planning and include areas that are of high use and value to local residents in a subsistence classification. Salmon are the cornerstone of our region's economy and culture and the BBAP needs to include additional mineral closing orders so salmon streams documented after 1984 have the protection they deserve. Also, high quality winter habitat is essential for wildlife survival so classify all moose and caribou wintering grounds; brown bear denning areas and caribou calving grounds as habitat. Also in Bristol Bay all streams where salmon spawn (whether navigable or not) should be classified as habitat.

The Nushagak Fish and Game Advisory Committee would like to be involved in any future revision process for the Bristol Bay Area Plan, because we have the expertise and wisdom of the resources that all user groups depend on within the Nushagak drainages. Furthermore, we recommend that the State of Alaska Department of Natural Resources utilize the knowledge of all 82 Advisory Committees when revising Area Plans throughout the State of Alaska. In closing, the Nushagak Fish and Game Advisory Committee would like the State of Alaska Department of Natural Resources to incorporate the Citizens Alternative Bristol Bay Area Plan into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 494 of 497 - submitted on 05/06/2013 at 12:00 AM:

I am submitting the following comments for consideration in support of increased habitat protection for salmon relative to the PRD of the 2005 BBAP. As a fisheries scientist I have conducted fish surveys and studies in the Bristol Bay region since 1991 for the US government, Alaska Native entities, and non-profits. During 2008-2010, I conducted and supervised a census of fish populations and habitat in and near Bristol Bay mine leases near Iliamna Lake. We surveyed 108 headwater streams of 10% gradient or less, on lands reclassified in the 2005 BBAP from a habitat to a mineral priority (Woody and O'Neal 2010 1). We documented:

- Salmon in 75% or 3 of every 4 streams.
- Species important to subsistence in 96% of streams.
- Most headwater streams surveyed were less than 0.5 m deep.

Headwater streams in the United State comprise about 53% of total stream/river mileage and represent a critical element of an integrated functioning hydrological system. Many small streams can be intermittent and many are not navigable. However, they are still critical to a functioning watershed as summarized by Nadeau and Rains (2007) 2:

"Hydrological connectivity allows for the exchange of mass, momentum, energy, and organisms longitudinally, laterally, vertically, and temporally between headwater streams and downstream waters. Via hydrological connectivity, headwater, intermittent and ephemeral streams cumulatively contribute to the functional integrity of downstream waters; hydrologically and ecologically, they are a part of the tributary system."

To fish, all streams are navigable if there is sufficient water depth to allow their survival and/or movement among essential feeding, rearing, breeding areas, etc., but what is navigable to a small salmon may not be navigable to a human in a boat. It is important to recognize that non-navigable streams comprise important salmon habitat in Bristol Bay and that it is important to conserve those areas to sustain salmon production. If those habitats are reduced in quantity, then overall salmon productivity will diminish.³ I recommend DNR classify all anadromous habitat as habitat, whether a human can navigate it or not.

It is important to note that many streams in the region have never been surveyed, or surveyed only once, and salmon may be present in an even greater percentage of streams than our surveys show, but data are lacking. Since Bristol Bay is the world's most productive sockeye salmon system (~37 million/yr), is likely now the world's most productive Chinook salmon producer (100,000-200,000/yr), and produces coho, pink and chum salmon all of which contribute to valuable

commercial, sport, and subsistence fisheries of the region, and since productive fisheries are a product of high quality habitat, the State should ensure that salmon habitat is protected and conserved in the final revised BBAP by:

* Assuming all streams of 10% gradient or lower in the Bristol Bay region support salmon, unless proven otherwise by scientific studies.

* Restoring automatic 1984 instream flow reservation for anadromous waters- salmon need water to survive and minimum flows should be guaranteed.

* Riparian areas of all anadromous streams in current mine leases should be protected under Mineral Closing Order 393, as they are most vulnerable to harm at this time.

In order to conserve Bristol Bay salmon production it is important to recognize that many streams in the region are groundwater fed, and hydrologic connectivity between ground and surface waters is often not considered, but important in order to maintain provide fish cool thermal refuges in summer and ice-free overwintering habitat when surface waters freeze.⁴ Reserving in-stream flows, including natural groundwater flow in winter is critical to sustaining salmon productivity in this region.⁵

Conservation of Bristol Bay salmon productivity relies in large part on the continued ability of freshwater natal habitats to sustain them. Salmon use small headwater habitats for spawning, incubation and rearing, and some species can remain in small non-navigable streams one to two years (Chinook, coho) prior to seaward migration ⁶ making them particularly susceptible to watershed management practices. Because salmon adapt to natural flow regimes in their natal habitats, and because natural flow regimes strongly influence thermal, chemical, physical and biotic regimes ⁷ of natal habitats, significant alteration in these parameters can potentially reduce salmon productivity. It is widely recognized that loss and alteration of once productive salmon habitat has led to their extirpation and endangerment in US waters.⁸ Conservation of salmon depends in large part on conservation of their essential freshwater habitats.⁹

Thank you for your consideration of these comments in your efforts to revise the Bristol Bay Area Plan. Please ensure that the future productivity of salmon habitat is conserved for future generations.

Sincerely

1 Woody and O'Neal. 2010. Fish surveys in headwater streams of the Nushagak and Kvichak River drainages, Bristol Bay Alaska, 2008-2010. Fisheries Research & Consulting for The Nature Conservancy. Anchorage Alaska. Available at: www.pebblescience.org/reports.html

2 Nadeau and Rains. 2007. Journal of the American Water Resources Association. Vol. 43(1)118-133.

3 ADFG. 2013. Anadromous waters catalog. Available at: <http://www.adfg.alaska.gov/sf/SARR/AWC/>

4 Winter, T.C., J.W. Harvey, O.L. Franke, and W.M. Alley. 1998. Groundwater and surface water — a single resource. US Geological Survey, Circ. 1139. 87 pp. AND Power, G., R.S. Brown, and J.G. Imhof. 1999. Groundwater and fish: Insights from northern North America. Hydrological Processes 13: 401-422

5 Woody and Higman. 2011 Groundwater as Essential Salmon Habitat In Nushagak and Kvichak River Headwaters: Issues Relative to Mining. And references therein.

6 ADFG. 2013. Anadromous waters catalog. Available at: <http://www.adfg.alaska.gov/sf/SARR/AWC/>

7 Winter, T.C., J.W. Harvey, O.L. Franke, and W.M. Alley. 1998. Groundwater and surface water — a single resource. US Geological Survey, Circ. 1139. 87 pp. AND Power, G., R.S. Brown, and J.G. Imhof. 1999. Groundwater and fish: Insights from northern North America. Hydrological Processes 13: 401-422 AND Hilborn, R., Quinn, T. P., Schindler, D. E. & Rogers, D. E. 2003. Biocomplexity and fisheries sustainability. Proc. Natl Acad. Sci. USA 100, 6564-6568 (2003) AND Fraser, D.J., L.K. Weir, L. Bernatchez, MM Hansen and EB Taylor. Extent and scale of local adaptation in salmonid fishes: review and meta-analysis. Heredity. 106, 404-420

8 Mclure, MM, SM Carlson, TJ Beechie, GR Pess, JC Jorgensen, SM Sogard, SE Sultan, DM Holzer, J. Travis, BL Sanderson, M.E. Power, and R. W. Charmichael. 2008. Evolutionary consequences of habitat loss for Pacific anadromous salmonids. Evolutionary applications. 1752 - 4571.

9 Schindler, D. E., R. Hilborn, B. Chasco, C. P. Boatright, T. P. Quinn, L. A. Rogers, and M. S. Webster. 2010. Population diversity and the portfolio effect in an exploited species. Nature 465:609-612. AND Hilborn, R., Quinn, T. P.,

Schindler, D. E. & Rogers, D. E. 2003. Biocomplexity and fisheries sustainability. Proc. Natl Acad. Sci. USA 100, 6564-6568 (2003).

Comment 495 of 497 - submitted on 05/06/2013 at 12:00 AM:

As an Alaskan resident I'm writing to provide comment on the State of Alaska's Department of Natural Resources revisions to the 2005 Bristol Bay Area Plan. First and foremost, the DNR failed to consult in meaningful way with the people of Alaska during the 2005 B.B.A.P. revision process. Despite the fact Bristol Bay residents have spent years working on a vision for the future of Bristol Bay, there was no consultation with tribes, local governments, sport or commercial fishing groups while drafting the proposed changes to the land management plan.

In addition, recent revisions to the BBAP released by the agency released in early 2013 provide inadequate protection for the Bristol Bay region.

In response, I'm writing to formally support the Bristol Bay Area Plan Citizen's Alternative, submitted by Bristol Bay area Alaska Native tribes, commercial & sport fishermen and variety of Bristol Bay based business interests. Among other things the BBAPCA recommends D.N.R. include these additional revisions in the 2013 Bristol Bay Area Plan:

- Increase habitat classifications for wildlife and fish
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- Implement a new Mineral Closing Order that would ban new mining claims on or along salmon spawning streams threatened by mining
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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 496 of 497 - submitted on 05/06/2013 at 12:00 AM:

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I look forward to the voices from Bristol Bay being included in our own land management plan process and once again I fully recommend the State of Alaska Department of Natural Resources incorporate the Bristol Bay Area Plan Citizen's Alternative into the final 2013 Bristol Bay Area Plan.

Sincerely

Comment 497 of 497 - submitted on 04/30/2013 at 04:50 PM:

We need to be very careful and realize we won't get any 2nd chances. Hunting, Fishing, and subsistence is more important than any inedible metal out of the ground. Track records do not bode well for Alaskans!