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Appendix D: ANILCA Section 810 Analysis of Subsistence Impacts

On January 30, 2004, the Bureau of Land Management (BLM) issued a Notice of Intent in the Federal Register to prepare a Resource Management Plan (RMP) and associated Environmental Impact Statement (EIS) for public lands administered by the Fairbanks District Office. As defined by the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, “public lands” are those federally-owned lands and interests in lands (such as federally-owned mineral estate) that are administered by the Secretary of the Interior through the BLM. In this case, public lands also include lands selected, but not yet conveyed, to the State of Alaska and Native corporations and villages.

Current management of these lands is guided by the Northwest Management Framework Plan (MFP) (BLM 1982). Since approval of the MFP in 1982, new regulations and policies have created additional considerations that affect the management of public lands. In addition, new issues and concerns have arisen over the past 20 years. Consequently, some of the decisions in the MFP are no longer valid or have been superseded by requirements that did not exist when the MFP was prepared. Through the completion of an RMP/EIS, the BLM proposes to provide a comprehensive land use plan that will guide management of the public lands and interests administered by the Fairbanks District Office and the Anchorage Field Office.

Chapter III: Affected Environment and Chapter IV: Environmental Consequences of the Kobuk-Seward Peninsula Resource Management Plan provide a detailed description of both the affected environment of the Planning area and the potential adverse effects of the various alternatives to subsistence. This appendix uses the detailed information presented in the Proposed RMP/Final EIS to evaluate the potential impacts to subsistence pursuant to Section 810(a) of the Alaska National Interest Land Conservation Act (ANILCA).

A. Subsistence Evaluation Factors

Section 810(a) of the ANILCA requires that an evaluation of subsistence uses and needs be completed for any federal determination to “withdraw, reserve, lease, or otherwise permit the use, occupancy or disposition of public lands.” As such, an evaluation of potential impacts to subsistence under the ANILCA Sec. 810(a) must be completed for the Proposed RMP/Final EIS. ANILCA requires that this evaluation include findings on three specific issues:

- The effect of use, occupancy, or disposition on subsistence uses and needs;
- The availability of other lands for the purpose sought to be achieved; and
- Other alternatives that would reduce or eliminate the use, occupancy, or disposition of public lands needed for subsistence purposes (16 USC Sec. 3120).

The evaluation and findings required by the ANILCA Sec. 810 are set out for each of the four alternatives considered in the Proposed RMP/Final EIS.

A finding that the proposed action may significantly restrict subsistence uses imposes additional requirements, including provisions for notices to the State of Alaska and appropriate regional and

local subsistence committees, a hearing in the vicinity of the area involved, and the making of the following determinations, as required by Section 810(a)(3):

- Such a significant restriction of subsistence uses is necessary, and consistent with sound management principles for the utilization of the public lands;
- The proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of use, occupancy, or other disposition; and
- Reasonable steps will be taken to minimize adverse effects upon subsistence uses and resources resulting from such actions.

To determine if a significant restriction of subsistence uses and needs may result from any one of the alternatives discussed in the Proposed RMP/Final EIS, including their cumulative effects, the following three factors in particular are considered:

- The reduction in the availability of subsistence resources caused by a decline in the population or amount of harvestable resources;
- Reductions in the availability of resources used for subsistence purposes caused by alteration of their normal locations and distribution patterns; and
- Limitations on access to subsistence resources, including from increased competition for the resources.

A significant restriction to subsistence may occur in at least two instances: 1) when an action substantially reduces populations or their availability to subsistence users, and 2) when an action substantially limits access by subsistence users to resources. Chapter III: Affected Environment of the Proposed RMP/Final EIS provides information on areas and resources important for subsistence use, and the degree of dependence of affected villages on different subsistence populations. Chapter IV: Environmental Consequences provides much of the data on levels of reductions and limitations under each alternative, which was used to determine whether the action would cause a significant restriction to subsistence. The information contained in the Proposed RMP/Final EIS is the primary data used in this analysis.

A subsistence evaluation and findings under ANILCA Sec. 810 must also include a Cumulative Impacts analysis. The following section begins with evaluations and findings for each of the four alternatives discussed in the Proposed RMP/Final EIS. Finally, the cumulative case, as discussed in Chapter IV: Environmental Consequences of the Proposed RMP/Final EIS is evaluated. This approach helps the reader to separate the subsistence restrictions that would potentially be caused by activities proposed under the four alternatives from those that would potentially be caused by past, present, and future activities that could occur, or have already occurred, in the surrounding area.

When analyzing the effects of the four alternatives, particular attention is paid to those communities who have the potential to be most directly impacted by the proposed actions. These communities are located within or adjacent to the Kobuk-Seward Peninsula planning area. The cumulative case expands the analysis to include lands outside, but near the planning area, including indirect effects to communities located in other areas of the state, to assess any impacts to subsistence that may result because of negative effects to migratory subsistence species.

In addition to ANILCA, Environmental Justice, as defined in Executive Order 12898, also calls for an analysis of the effects of federal actions on minority populations with regard to subsistence. Specifically, Environmental Justice is:

The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.

Section 4-4 of Executive Order 12898, regarding the Subsistence Consumption of Fish and Wildlife, requires federal agencies to collect, maintain, and analyze information on the consumption patterns of populations who principally rely on fish and/or wildlife for subsistence, and to communicate to the public any risks associated with the consumption patterns from activities that they are proposing. To this end, the description of subsistence use as presented in Chapter III: Affected Environment, as well as the subsistence analyses of the alternatives located in Chapter IV: Environmental Consequences of the Resource Management Plan, have been reviewed and found to comply with Environmental Justice requirements.

B. ANILCA Sec. 810(a) Evaluations and Findings for All Alternatives

The following evaluations are based on information relating to the environmental and subsistence consequences of alternatives A through D of the Proposed RMP/Final EIS and the cumulative impacts analysis as presented in Chapter IV: Environmental Consequences. The oil and gas lease stipulations and required operating procedures discussed in Appendix A of the Proposed RMP/Final EIS are also considered for the alternatives to which they apply. The evaluations and findings focus on potential impacts to the subsistence resources themselves, as well as access to resources, and economic and cultural issues that relate to subsistence use.

1. Evaluation and Finding for Alternative A

Selection of Alternative A would result in continued management of the Kobuk-Seward Peninsula planning area as specified in the 1982 Northwest Management Framework Plan. Valid decisions contained in the Northwest MFP would be implemented if not already completed. Direction contained in existing laws, regulation and policy would also continue to be implemented, sometimes superseding provisions in the Northwest MFP. The current levels, methods and mix of multiple use management of public land in the planning area would continue, and resource values would receive attention at present levels. In general, most activities would be analyzed on a case-by-case basis and few uses would be limited or excluded as long as they were consistent with State and Federal laws. Fire would be managed consistent with the Alaska Land Use Plan Amendment for Wildland Fire and Fuels Management (BLM 2004b, 2005c).

a) Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Uses and Needs

Under Alternative A, the primary impacts to subsistence would be associated with proposed inventory and monitoring efforts for a variety of resources, as well as the continuation of the current management of Recreation and Off-Highway Vehicle (OHV) use in the planning area as described within the 1982 Northwest Management Framework Plan.

Extensive research projects, such as those conducted for inventory and monitoring purposes, have the potential to affect subsistence species and use in the planning area. Specifically, the following activities associated with data collection could displace subsistence resources from traditional harvest areas for the duration of the activity: temporary or long-term camps and associated facilities; the use of aircraft, especially helicopters, for aerial surveys; and the use of boats or ATVs. This activity is expected to be temporary and localized, and not affect any fish or wildlife at the population level. However, the most frequent complaint voiced by subsistence users on the North Slope of Alaska concerns the large amount of aerial disturbance to animals that occurs each field season in conjunction with scientific studies (BLM NPR-A Subsistence Advisory Panel 2002). At the same time, many of the proposed inventory and monitoring efforts would serve to benefit subsistence resources by providing valuable baseline information that would be used to maintain or improve habitat as well as wildlife and fish populations. Similarly, because every action in the planning area would be evaluated on a case-by-case basis under Alternative A, each research project could have BLM-imposed required operating procedures in order to minimize impacts to subsistence use.

Under Alternative A, the greatest impact to subsistence would likely result from continuing the current management standard of OHV and recreational use in the planning area. At present, both commercial and non-commercial recreational use on BLM lands in the planning area is relatively minor. However, there are a few heavily used areas where these activities compete directly with subsistence use, namely in the Squirrel River corridor and in the area around the community of Koyuk on Norton Bay. During scoping, residents from these areas expressed concern over the large number of sport hunters and guiding operations that not only compete with the subsistence users for resources, primarily moose, but also degrade the habitat due to the associated concentration of OHV use in a relatively short amount of time (BLM 2004c). Subsistence hunters from Kiana and Kotzebue maintain that the increase in air traffic and the presence of sport hunters in the Squirrel River area during the hunting season has resulted in the displacement of migrating caribou eastward, away from the traditional use areas for those communities and Noorvik. Under the current management plan, there is little that the BLM can do to limit the amount and type of use in these areas.

According to ADF&G, the amount reasonably necessary for subsistence uses of moose in Game Management Unit 23 is between 325-400 moose annually (Dau 2002a, 2004a), a number that is considered relatively low, in part, due to the large number of Western Arctic Caribou Herd (WACH) animals that are harvested annually. Should the WACH experience a rapid decline, subsistence hunter reliance on moose would increase throughout the planning area.

b) Evaluation of the Availability of Other Lands for the Purpose Sought to be Achieved

The purpose sought to be achieved under Alternative A would be to continue the current management of BLM-managed lands in the planning area under the 1982 Northwest Management Framework Plan. Lands managed by other federal agencies in the planning area are managed under National Park Service or Fish and Wildlife Service planning documents. Other BLM lands in the State either already have land use planning documents in place, or are being addressed by separate planning processes. State and Native corporation lands cannot be considered in a BLM plan, and under BLM policy other BLM lands outside of Alaska are not considered under ANILCA.

c) Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes

Alternatives that would reduce or eliminate the use of public lands needed for subsistence include the three action alternatives (A, B, and C) that are presented and analyzed in Chapters II and IV of the main body of the Proposed RMP/Final EIS. These alternatives were created to represent a wide-range of potential activities that could occur on BLM-managed lands, along with management actions that would serve to protect specific resource values following current national guidelines. Additional alternatives that were considered but not analyzed in detail are also discussed in Chapter II.

d) Finding

Alternative A may significantly restrict subsistence use and needs in the Squirrel River area. The impacts to subsistence users of moose by increased competition in this heavily used area, as well as the associated displacement of resources and OHV issues discussed above meet the threshold of “may significantly restrict subsistence use.” This finding applies to the communities of Kiana, Kotzebue, Noorvik and possibly Ambler.

2. Evaluation and Finding for Alternative B

Alternative B lays the groundwork for active management to facilitate resource development on BLM lands in the planning area. In this alternative, constraints to protect resource values or habitat would be implemented in very specific geographic areas rather than across the planning area. All ANCSA (d)(1) withdrawals would be revoked on lands retained in long-term Federal ownership, increasing the potential for mineral exploration and development. Seasonal stipulations for oil and gas leasing in caribou habitat would not apply under this alternative (Appendix A). Travel and trail restrictions would be minimized. One Special Recreation Management Area would be identified in the Squirrel River to focus management on recreational use. In other areas recreation management would focus on dispersed recreation and management of permits. Management of State- and Native-selected lands would be mostly custodial.

a) *Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Uses and Needs*

Under Alternative B, the primary potential impacts to subsistence would be associated with the proposed management of the Livestock Grazing and Leasable Minerals programs. Impacts to subsistence could also result from mineral exploration and development under the Locatable Minerals program, as well as from proposed inventory and monitoring efforts under a variety of resource programs (see Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Uses and Needs beginning on page D-6). However, unlike Alternative A, inventory and monitoring efforts under Alternative B would be guided by a standard set of Required Operating Procedures that serve to protect habitat and resources from potential impacts as a result of permitted activity within the planning area (see Appendix A).

Alternative B has the greatest potential for impacts to subsistence resources from grazing because of the potential impacts to the Western Arctic Caribou Herd (WACH), which is the primary source of large land-mammal protein for most communities in the planning area. Under this alternative the entire planning area would be open to reindeer grazing, which could result in a reduction of grazing habitat for the WACH. However, it is unlikely that new reindeer grazing operations would be established outside of the Seward Peninsula during the life of the plan, due to the documented difficulties of managing a reindeer herd in the presence of caribou (Koskey 2003).

Under Alternative B, oil and gas leasing would be allowed on all BLM lands, except for within “no surface occupancy” zones established along the Pah, Shaktoolik, Ungalik, Inglutalik, Tubutulik, Kuzitrin, and Fish rivers, and along the west bank of the Noatak River. Oil and gas leasing can result in three associated activities: seismic exploration, exploratory drilling, and development. Under Alternative B, no seasonal restrictions would be imposed on oil and gas activity, however, oil and gas exploration would only be allowed to occur during the winter months under specific conditions (see Chapter II).

Subsistence activities that occur during the winter season, and therefore could be affected by seismic exploration or exploratory drilling include: furbearer trapping and hunting, fishing, and hunting of large mammals such as caribou, moose, and muskox. Recent testimony by subsistence hunters in the National Petroleum Reserve-Alaska, where seismic activity is a common yearly occurrence, has indicated that seismic exploration does interfere with overland travel by snowmobile (Brower 2002). Specifically, the deep ruts left in the snow by seismic vehicles create difficult terrain to traverse, and result in excessive wear-and-tear on both snowmobiles and the sleds that are pulled behind them. Replacement or repair of these tools that are used for subsistence harvesting is costly. However, despite the hindrance and annoyance, seismic exploration does not create a substantial barrier between communities and subsistence resources. Additionally, seismic exploration or exploratory drilling are only expected to result in the temporary displacement of subsistence resources and will not effect on the population as a whole.

Impacts from oil and gas development and associated infrastructure are greater than for exploration, given the permanent and year-round nature of operations. If a development were to occur in the calving area of the WACH, or if infrastructure was constructed in such a way as to impede movement of the herd to important insect-relief habitat, then there would be significant impacts to this important subsistence resource. However, for the purposes of this planning effort, it is expected that one oil and gas developmental facility would be constructed in the northern portion of the planning area under Alternative B, outside of the WACH calving area. Other subsistence

species that could be affected by oil and gas include moose, brown bear and muskox; however, impacts to these species as a result of Alternative B are considered negligible (See Wildlife, Alternative B, Impacts to Wildlife from Leasable Minerals discussion in Chapter IV). Although specific parameters concerning the projected development are not discussed, associated roads, pipelines, and docking facilities all serve to potentially displace animals until which time they become acclimated to the infrastructure. Additionally, roads, docks, and even remote airstrips constructed to aid production may serve as potential inroads for nonlocal hunters, increasing the amount of competition to resources in the area. Adequate stipulations and ROPs concerning the use of infrastructure by nonlocals would serve to minimize this type of impact.

Impacts to subsistence uses and wildlife from other potential industries, such as Locatable Minerals (hard-rock or placer mining), Mineral Materials (gravel pits), and Forest Products (timber sales) are expected to be minor given the anticipated levels of these activities. Under Alternative B, the Squirrel River would be designated as a Special Recreation Management Area (726,000 acres) and conflicts between users would be addressed by limiting the number of guides and outfitters allowed to operate in the area, and the number visitor use days. In this way, Alternative B has less impact than Alternative A with regard to subsistence use in this heavily-utilized area (see discussion under Alternative A).

b) Evaluation of the Availability of Other Lands for the Purpose Sought to be Achieved

The purpose sought to be achieved under Alternative B would be to manage BLM lands in the planning area in order to optimize resource development, with little or no restraints on commercial activity. Lands managed by other federal agencies in the planning area are managed under National Park Service or U.S. Fish and Wildlife Service planning documents, and wide-scale development of these lands is limited or disallowed by the mission and goals of these federal lands as conservation system units. Other BLM lands in the State, such as the National Petroleum Reserve Alaska, are managed primarily to allow for oil and gas development under specific planning documents. Additional BLM lands are managed by current planning documents that allow a mixture of development and conservation following the BLM multiple-use mission, or are currently being evaluated through the planning process. State and Native Corporation lands cannot be considered in a BLM plan, and under BLM policy other BLM lands outside of Alaska are not considered under ANILCA.

c) Evaluation of Other Alternatives that would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes

Alternatives that would reduce or eliminate the use of public lands needed for subsistence uses include the three action alternatives that are presented and analyzed in Chapters II and IV of the Proposed RMP/Final EIS. These alternatives were created to represent a wide-range of potential activities that could occur on BLM-managed lands, along with management actions that would serve to protect specific resource values following current national guidelines. Additional alternatives that were considered but not analyzed in detail are also discussed in Chapter II.

d) Finding

Alternative B would not significantly restrict subsistence use by communities in or near the planning area given the management parameters outlined in Chapter II of Proposed RMP/Final EIS and including the Stipulations and ROPs found in Appendix A. Should the amount of oil and gas exploration or anticipated area of potential development expand, then this finding may need to be revised to take into account unmitigatable impacts to the WACH, and, therefore, to subsistence use.

3. Evaluation and Findings for Alternative C

Alternative C emphasizes active measures to protect and enhance resource values. Production of minerals and services would be more constrained than in Alternatives B or D and in some areas, uses would be excluded to protect sensitive resources. Areas of Critical Environmental Concern (ACEC) and Special Recreation Management Areas (SRMA) are identified, and specific measures proposed to protect or enhance values within these areas. Several rivers are recommended suitable for designation under the Wild and Scenic River Act. Additional limitations on Off Highway Vehicles are proposed to protect habitat, soil and vegetation resources. Most ANCSA (d)(1) withdrawals are revoked but some would be replaced with new withdrawals in order to protect or maintain resource values. Standard Oil and Gas Lease Terms, Oil and Gas Lease Stipulations, and Required Operating Procedures would be implemented to protect resource values, should oil and gas leasing or activity occur. Several areas of caribou and salmon habitat would be unavailable for mineral entry and leasing. This alternative treats lands selected by the State and by Native or village corporations as if it were to be retained in long-term Federal ownership.

a) Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Uses and Needs

The analysis of the effects of Alternative C on subsistence uses finds little impact as a result of management actions or designations within the planning area. In fact, many of the proposed actions serve to positively impact subsistence use in that management would emphasize habitat and resource protection. While development activity could occur under this alternative, areas of crucial habitat would be protected by special designation, and by the stipulations and ROPs as presented in Appendix A. Actions such as the creation of new SRMAs, ACECs, and/or the designation of rivers under the Wild and Scenic Rivers Act, do not limit or impose any restriction on subsistence use.

b) Evaluation of the Availability of Other Lands for the Purpose Sought to be Achieved

The purpose sought to be achieved under Alternative C would be to manage BLM lands in the planning area in order to optimize conservation. Lands managed by other federal agencies in the planning area are managed under National Park Service or U.S. Fish and Wildlife Service planning documents, and are considered conservation system units. Other BLM lands in the State either already have land use planning documents in place that specify the amounts and types of activities that can or can not occur, or are currently being evaluated by separate planning processes. State

and Native Corporation lands cannot be considered in a BLM plan, and under BLM policy other BLM lands outside of Alaska are not considered under ANILCA.

c) Evaluation of Other Alternatives that would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes

Alternatives that would reduce or eliminate the use of public lands needed for subsistence uses include the three action alternatives that are presented and analyzed in Chapters II and IV of the Proposed RMP/Final EIS. These alternatives were created to represent a wide-range of potential activities that could occur on BLM Lands, along with management actions that would serve to protect specific resource values following current national guidelines. Additional alternatives that were considered but not analyzed in detail are also discussed in Chapter II.

d) Finding

Alternative C would not significantly restrict subsistence use by communities in the planning area. Most impacts to subsistence resources would be beneficial, and any impacts by way of the limited amount of development allowed to occur under this alternative would be minimized by Standard Oil and Gas Lease Terms, Oil and Gas Lease Stipulations, and Required Operating Procedures.

4. Evaluation and Finding for the Proposed Resource Management Plan (Alternative D)

The Proposed RMP (Alternative D) emphasizes a balanced level of protection, use, and enhancement of resources and services. Constraints to protect resources would be implemented, but would be less restrictive than under Alternative C. This alternative would designate six ACECs, and two SRMAs. No rivers would be recommended as suitable for designation under the Wild and Scenic River Act. This alternative would revoke all remaining ANCSA (d)(1) withdrawals, leaving the planning area open to mineral entry and location. Standard Oil and Gas lease terms, Oil and Gas lease stipulations and Required Operating Procedures would be implemented to protect resource values, should oil and gas leasing or activity occur. This alternative includes additional leasing stipulations and required operating procedures that provide additional protection to caribou and salmon habitats. This alternative describes interim and long-term management strategies for lands selected by the State, or Native regional or village corporations.

Under the proposed RMP (Alternative D), goals have been identified for every program managed by the BLM, and various strategies have been identified and described to guide the BLM in achieving these goals, including inventory and monitoring, management actions, and land use requirements. This updated framework alone is an improvement over the former Northwest Management Framework Plan, which was completed in 1982, and, therefore, does not reflect the issues and management concerns that are currently present in the Planning Area. The Proposed RMP represents the mix and variety of actions that the BLM believes best resolves the identified issues and management concerns in consideration of all values and programs, and is thus considered the BLM's Preferred Alternative and Proposed RMP.

a) Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Uses and Needs

The Proposed RMP (Alternative D), much like the draft action alternatives, finds little impact to subsistence use as a result of management actions. All lands within the planning area would be available for oil and gas leasing and impacts similar to those discussed under Alternative B could occur. However, protective measures in the form of Standard Oil and Gas Lease Terms, Oil and Gas Lease Stipulations, and Required Operating Procedures (see Appendix A), including the seasonal restriction of activity, as well as the creation of special areas and ACECs, serve to protect wildlife and habitat from undue stress, thereby reducing potential impacts to subsistence use from a reduction in the amount of available resources. No reduction in or interference to access by subsistence users is anticipated under the Proposed RMP.

Under the Proposed RMP (Alternative D), 726,000 acres of the highly utilized Squirrel River would be managed as a Special Recreation Management Area, and a Recreation Area Management Plan (RAMP) would be developed with substantial local involvement to address recreational use, taking into consideration current use levels, safety, resource impacts, operator tolerance, and quality of recreational experience. Until which time the RAMP would be completed, outfitters and guides would be managed at the 2004/2005 use level, and air taxis and transporters would be required to obtain land use permits to operate on BLM lands. While impacts to subsistence users from competition for resources may still occur along the Squirrel River, the new permit system will allow the BLM to manage and respond to impacts from this type of use. As a result, impacts to subsistence users should be lessened. Once the RAMP is in place, it is envisioned that improved management of both casual and commercial recreation would result in reduced impacts to wildlife and their habitat, and thus, to subsistence.

The primary impact to fish (all species) as a result of the Proposed RMP (Alternative D) is the potential for permitted activities to increase sedimentation and siltation in fish-bearing streams. Direct threats to fish from sediment include changes to physical habitat, subsequent decreased reproductive success, and loss of rearing habitat (see Chapter IV section (B)(3)(a)). The primary activities that can lead to increased erosion and subsequent sedimentation are: recreation, gravel and mineral mining, and fire management. Most of the potential impacts from these activities would be mitigated by the Required Operating Procedures, Stipulations, and Lease Terms found in Appendix A, including ROPs for: Soils, Vegetation, Water, Fish and Wildlife, Minerals Materials, and Mining Law Administration. A 300' setback along streams is considered less protective of fish habitat than a closure to mineral entry and leasing. However, according to the analysis in Chapter IV, impacts to fish as a result of the Proposed RMP would be negligible, and would not result in a population-level decline or a reduction in habitat.

The primary impact to wildlife, especially large mammals (e.g., caribou, moose, musk oxen), as a result of Proposed RMP is the temporary displacement and disturbance of animals from areas of permitted activity, including oil and gas exploration in the northeastern portion of the Planning Area, and mineral entry. These impacts are minimized by the Required Operating Procedures, Stipulations, and Lease Terms found in Appendix A, especially those ROPs that require seasonal restrictions on activity in special areas during key periods, such as the core calving area or insect relief area of the Western Arctic Caribou Herd. In addition, the designation of six ACECs (Area's of Critical Environmental Concern) provides additional protection of key habitat for wildlife resources. The Proposed RMP is not anticipated to result in population-level declines to wildlife in the Planning Area.

