

# **Public Scoping Report**

## **Eastern Interior Resource Management Plans:**

Upper Black River Subunit  
Fortymile Subunit  
Steese National Conservation Area, and  
White Mountains National Recreation Area

Bureau of Land Management  
Eastern Interior Field Office

December 2008

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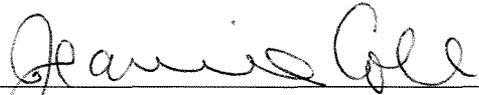
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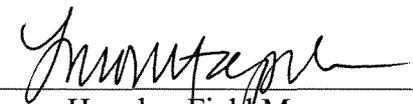
# Public Scoping Report

## Eastern Interior Resource Management Plan

U.S. Department of the Interior  
Bureau of Land Management  
Eastern Interior Field Office  
1150 University Avenue  
Fairbanks, Alaska 99709

December 2008

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## Executive Summary

This report documents the public scoping process for the Bureau of Land Management's Eastern Interior Resource Management Plans (RMPs) and Environmental Impact Statement (EIS). It includes a description of the scoping process and activities, a summary of the comments submitted by the public, an overview of the issues identified through review of all scoping comments, and an overview of the planning schedule.

Public scoping is a requirement of the National Environmental Policy Act (NEPA, 40 Code of Federal Regulations [CFR] 1501.7) and BLM planning regulations (43 CFR 1610.2 and 43 CFR 1610.41). Scoping is the term used by the Council on Environmental Quality in their regulations implementing NEPA (40 CFR Parts 1500 et. seq.) to define the early and open process for determining the extent or "scope" of issues to be addressed in the planning process. The purpose of "scoping" is to identify issues important to the future management of public lands and resources. These issues will guide development of alternatives that will be evaluated in the EIS and will ultimately guide development of the RMPs. The scoping process also provides an opportunity to educate the public about the management of public lands and for BLM to gauge the concerns of those who have an interest in the resources and resource uses of the Eastern Interior Planning Area.

With the publication of the Notice of Intent (NOI) to prepare an RMP and EIS in the Federal Register on February 29, 2008, the BLM Eastern Interior Field Office (FO) initiated the first phase of the public scoping process. The BLM used various methods to inform the public of the initiation of scoping, including the development of an Eastern Interior RMP Web Page, news releases, and direct mailings.

As part of scoping, BLM identified preliminary planning criteria to be used throughout the planning process. Planning criteria establish the decision space in regards to the types of decisions to be made throughout this planning effort. These criteria were published in the Federal Register Notice. The tribes and public were asked to provide comments on issues or concerns regarding the scoping criteria, resources, and resource uses to be addressed in this planning effort.

The BLM then developed an information package which informed the recipients of the public scoping process for the preparation of the EIS and the scheduled meetings. The information package was mailed prior to the first public meeting to a mailing list compiled from data kept by the Eastern Interior FO.

During the eight scoping meetings, 122 people registered their attendance, with one person attending several meetings. The structure of the meetings varied, depending on the location but generally included both an open-house and a formal presentation. The meetings were generally held between 4:00 and 9:00 p.m., with the open-house in the afternoon and the presentation in the evening. This open-house format allowed BLM staff to interact with the public in a casual environment, while the formal part of the meeting allowed for group discussion and for attendees to make oral public comment if they so desired.

Comments were solicited at the meetings through preprinted comment forms or oral testimony. Attendees were encouraged to submit written comments after the meetings via e-mail or the US Postal Service. Approximately 67 pieces of correspondence were received during the formal scoping period.

# **Chapter 1. Introduction**

## 1.1. Overview

The Bureau of Land Management (BLM) is responsible for management of public land—its resources and uses—based on the principles of multiple use and sustained health, diversity, and productivity of public lands for present and future generations. Management direction is provided by land use plans, which are used to determine appropriate uses and allocate resources, develop strategy to manage and protect resources, and establish systems to monitor and evaluate the status of resources and effectiveness of management practices over time.

The BLM's Fairbanks District Office administers public land in the Eastern Interior planning area through its Eastern Interior and Central Yukon field offices. The public land in these areas is currently managed under three existing land use plans. These documents set forth land use decisions and terms and conditions for guiding the management of activities on the public land in the planning area.

Beginning in 2008, the Bureau of Land Management's Eastern Interior FO, began preparation of the Eastern Interior Resource Management Plans (RMPs). The Eastern Interior RMPs will provide a comprehensive framework for managing and allocating uses of the public lands and resources within the boundaries of the Eastern Interior planning area (Map 1.1).

The planning area is divided into four subunits. The Eastern Interior RMPs/EIS will evaluate and make land use decisions on each of these subunits. The subunits are: the Steese National Conservation Area (NCA), the White Mountains National Recreation Area (NRA), the Fortymile Subunit, and the Upper Black River Subunit. Subunit boundaries are currently being reviewed and will likely be revised slightly in the Analysis of the Management Situation.

### 1.1.1. Background

In 2002, the BLM completed plan evaluations for the Fortymile Management Framework Plan (1982), the Steese RMP (1986), and the White Mountains RMP (1986). The evaluations showed that all three plans needed updating to include the new BLM Alaska Land Health Standards, address changes to the T&E species list, and address changes made to the federal subsistence regulations. In addition, all three plans are deficient in addressing the planning guidance found in Appendix C of the BLM Land Use Planning Handbook, H-1601-1 (BLM 2005b). The evaluations also found that some of the decisions in the plans warranted further evaluation to determine if they were still valid. Ongoing land conveyance to the State of Alaska and Native corporations has substantially changed the land base managed by BLM within the Fortymile area.

The White Mountains RMP evaluation found that the off-highway vehicle (OHV) prescriptions did not meet the objectives outlined in the plan. The evaluation recommended that the White Mountains RMP be amended to address this issue. BLM started the plan amendment process with publication of an NOI on March 15, 2005. Scoping meetings were held and a scoping report was prepared (BLM 2005a). After the preparation of the scoping report, a decision was made not to continue with the amendment. Later BLM decided to revise the White Mountains RMP in conjunction with the revision of the Steese RMP and Fortymile MFP. This decision was based on new information such as the Doyon exchange and changes in BLM planning requirements. Appendix A of this document provides a summary of the *White Mountain National Recreation Area Resource Management Plan Amendment Scoping Report*.

While these three plans are out-of-date and may contain invalid decisions, the 2.5 million acres of BLM-administered public lands in the Upper Black River subunit and some scattered parcels in the Fortymile subunit (that are under the administration of the Central Yukon FO) have never had the benefit of being under the direction of a land use plan.

In order to meet requirements under the Federal Land Management Policy Act (FLPMA), the BLM needs to develop a land use plan for these areas. This planning effort will result in four approved RMPs that will provide comprehensive land management direction.

### **1.1.2. Purpose and Need**

The Bureau of Land Management's Fairbanks District Office has determined that the two RMPs and one Management Framework Plan (MFP) it relies on to manage the public land and Federal mineral estate in the Eastern Interior Planning Area (planning area) are outdated. Additionally, there are lands within the planning area that are not covered by any planning document.

Many elements of the two existing RMPs are still relevant. However, the Steese National Conservation Area RMP (1986) and the White Mountains National Recreation Area RMP (1986) need to be revised to respond to changing demographics, resource conditions, and policies. A RMP needs to be developed to replace the Fortymile MFP (1982) to meet BLM planning requirements, respond to changing conditions, and meet new policies. Additionally, an RMP is needed to cover lands in the Upper Black River watershed in the Northeastern portion of the planning area and also scattered parcels east of Fairbanks, that are not covered by an existing land use plan.

In order to reduce costs and streamline the planning process, the BLM is combining planning efforts for the Eastern Interior FO and has begun preparation of the Eastern Interior Resources Management Plans (RMPs). The Eastern Interior RMPs will consist of the revised Steese National Conservation Area (NCA) and White Mountains National Recreation Area (NRA) RMPs, the new Fortymile RMP; and the newly developed Upper Black River RMP. The Eastern Interior RMPs will provide a comprehensive framework for managing and allocating uses of public lands and resources within the boundaries of the Eastern Interior FO and portions of the Central Yukon FO as required by the Federal Land Management and Policy Act (FLPMA).

The planning area includes four distinct geographic and management subunits, corresponding to the RMP boundaries. These four RMPs and associated Environmental Impact Statement (EIS) will evaluate and make land use decisions on each of these subunits. The BLM's policy (BLM 2005b, H-1601-1, page 27) requires that two of the subunits, the Steese NCA and White Mountains NRA, have their own separate RMPs due to their respective status as a national conservation unit and national recreation area. Due to its remote location and lack of access, the Upper Black River Subunit will have a separate management emphasis and it will have a stand alone RMP. The Fortymile unit, which includes scattered parcels along the Alaska highway will also have its own RMP.

BLM will continue to manage public land and mineral estate in accordance with the current, unrevised RMPs and MFP until the Eastern Interior RMPs/EIS is completed and four records of decision (RODs) are signed. Four RODs will be required: one for the Steese NCA, one for the White Mountain NRA, one for the Fortymile Subunit and one for the Upper Black River Subunit (Table 1.1).

**Table 1.1. Summary of Eastern Interior RMPs Planning Process**

<b>Planning Subunit</b>	<b>Existing Plan</b>	<b>Planning Action</b>	<b>End Result</b>
Upper Black River	none	new RMP	Eastern Interior RMPs: Black River Subunit ROD and Approved RMP
Fortymile	Fortymile MFP and none	new RMP	Eastern Interior RMPs: Fortymile Subunit ROD and Approved RMP
Steese NCA	Steese RMP	RMP revision	Eastern Interior RMPs: Steese National Conservation Area ROD and Approved RMP
White Mountains NRA	White Mountains RMP	RMP revision	Eastern Interior RMPs: White Mountains National Recreation Area ROD and Approved RMP

## **1.2. Planning Area**

### **1.2.1. Location**

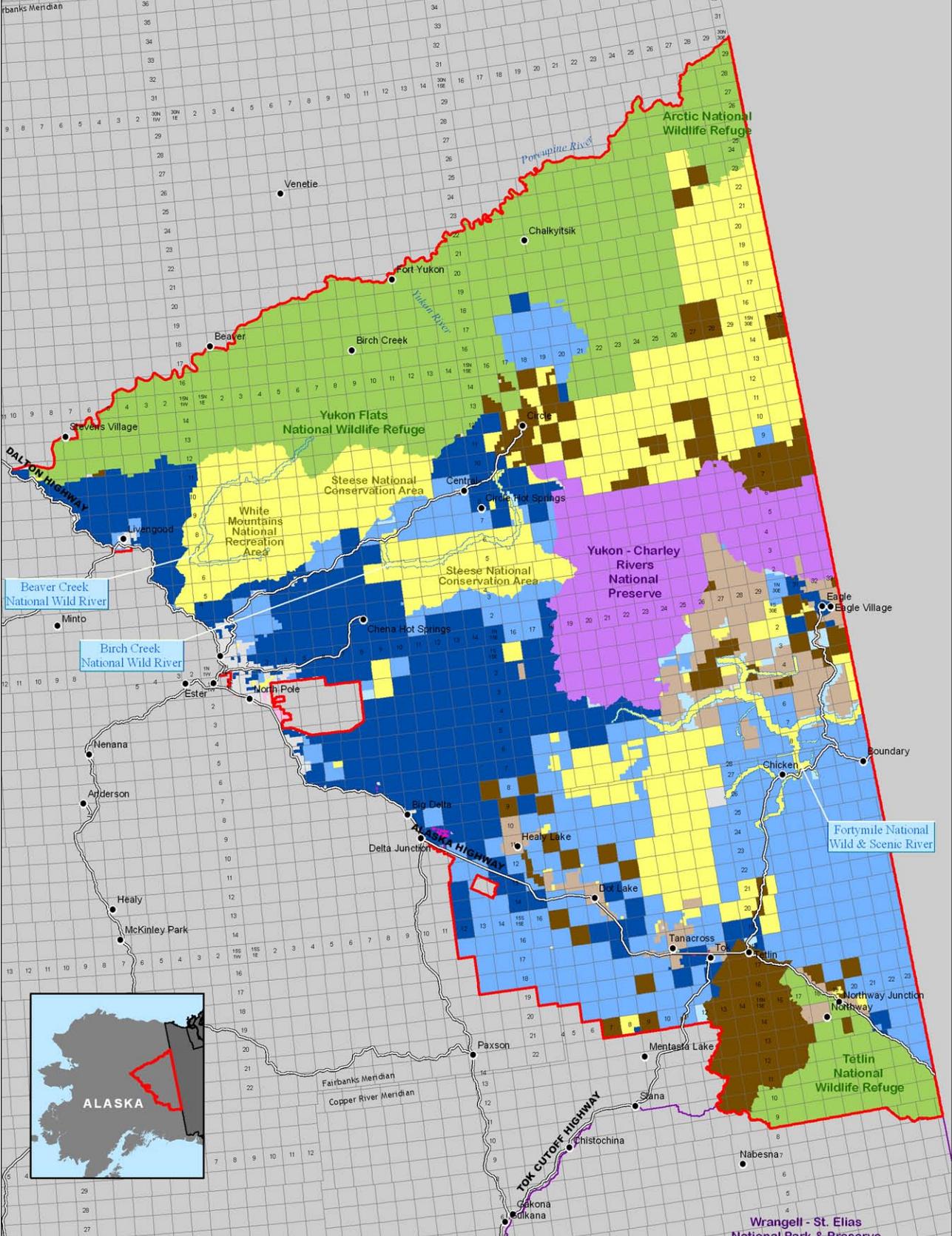
The Eastern Interior Planning Area is located in eastern Alaska (Map 1.1). It is bounded by the Yukon and Porcupine rivers at the north, the Dalton and Elliott Highways on the west, the BLM Fairbanks/Anchorage District boundary on the south, and the U.S. - Canada border on the east (approximately 300 miles of border). The planning area includes some land within northeastern portion of the Fairbanks North Star Borough, but otherwise is unincorporated. The planning area encompasses approximately 31.1 million acres, 8 million acres of which are BLM-managed lands in the Eastern Interior FO and the Central Yukon FO (Table 1.2).

## **MAP 1.1**

# **Land Status in the Eastern Interior Planning Area**



# Eastern Interior Planning Area Land Status



Land Status (07-18-2008)	
Yellow	BLM
Dark Blue	State of Alaska Patent or IC
Light Blue	State of Alaska Tentatively Approved
Light Cyan	State Selected
Brown	Native Patent or IC
Light Brown	Native Selected
Dark Brown	Native Village
Pink	Private / Municipal
Light Purple	National Park Service
Dark Purple	Military
Light Green	Fish & Wildlife Service
Grey	Landstatus Being Researched

\*\*Please note: The land status displayed on this map is not final and does not depict state selected lands in the Black River (northeastern) part of the planning area.

Red outline: Plan Boundary  
 Grey line: Roads

Land status displayed on map is being reviewed and is only intended for cartographic display. For official land status, please consult Master Title Plats or official casefiles.

0 6 12 24 36 Miles

**Map 1.1 Land Status in the Eastern Interior Planning Area**

## 1.2.2. Description

Major blocks of BLM-managed lands in the Eastern Interior planning area are found in the Steese and White Mountain areas, the upper Black River watershed, and the Fortymile River watershed. The planning area includes several Congressionally designated areas including the Steese NCA, White Mountains NRA, and the Fortymile, Beaver, and Birch Creek national wild and scenic rivers. The Pinnell Mountain National Recreation Trail is also in the planning area. Located within the Steese NCA, this trail was designated by the Secretary of Interior under the National Trails System Act of 1968. Additionally, there are four Research Natural Areas that were designated under existing RMPs.

Several other entities have jurisdiction within the planning area (Table 1.2). The planning area encompasses portions of three National Wildlife Refuges (NWR) managed by the U.S. Fish and Wildlife Service (FWS). These are the Yukon Flats NWR, the Arctic NWR, and the Tetlin NWR. The National Park Service (NPS) manages the Yukon Charlie Rivers National Preserve which also lies within the planning area boundary.

The State of Alaska manages approximately 34% of the planning area (Table 1.2), mostly through the Alaska Department of Natural Resources (DNR). The planning area encompasses portions of the Tanana Valley State Forest near Tok and Fairbanks. The BLM continues to convey additional land within the planning area to the State as part of their entitlement under the Alaska Statehood Act. Decisions in this plan will apply to State-selected land within the planning area until conveyance. The State is allowed to over select by 25%, therefore not all of the state-selected lands displayed on Map 1.1 will be conveyed. Final selection priorities were received from the State December 10, 2008. The maps in this document reflect the best land status data as of July 2008. The GIS coverage for land status will be updated before development of the Draft RMP.

The planning area includes approximately 2.5 million acres of private land (Table 1.2). The majority of this is land owned by Native corporations. Decisions in the Eastern Interior RMP will not apply to private surface land. The BLM continues to convey additional land within the planning area to Doyon Native Corporation and various Native village corporations as part of their entitlement under the Alaska Native Claims Settlement Act (ANCSA). Decisions in this plan will apply to native-selected land until conveyance. Doyon Corporation has selected significantly more acreage than their entitlement (Map 1.2). Therefore, some of the native-selected land displayed on Map 1.1 will either be retained in BLM ownership or will become available for selection by the State.

The planning area includes a small amount of split estate (Federal mineral estate under private surface). Subsurface mineral estate under Native corporation land is owned by the Regional Native corporation. Subsurface estate under State land belongs to the State. Some Federal mineral estate remains under native allotments and private lands in the Fairbanks area (Table 1.2).

The U.S. Army's Gerstle River Training Area and the Yukon Maneuver Areas are excluded from the planning area. Although these areas are BLM-administered public land, they are withdrawn from the public domain for military use. Management of the Yukon Maneuver Area is addressed in the Fort Wainwright RMP Amendment (BLM 2002) as required by the Military Lands Withdrawal Act of 1986 (P.L. 99-606). There is no BLM land use planning requirement for the Gerstle River Training Area. Therefore, these areas will not be subject to land use planning decisions resulting from the Eastern Interior RMPs/EIS.

There are 13 communities in the planning area and several other communities are adjacent to or partially within the boundary, including Fairbanks, Circle, Central, Chicken, Eagle, Delta Junction, Tok, and Fort Yukon. The majority of the planning area is roadless, although it is bounded by the Elliott and Dalton Highways on the west, the Alaskan Highway on the south, and has the Steese and Taylor Highways within its boundaries. The planning area is bisected by the Yukon River which serves as a transportation route between communities and subsistence camps during the summer.

BLM-administered public lands in the planning area offer dispersed recreational opportunities to residents and surrounding communities including Fairbanks. Residents of Anchorage also hunt and recreate in the area, particularly along the Taylor Highway.

**Table 1.2. Surface Management Responsibilities and Land Status as of January 2008**

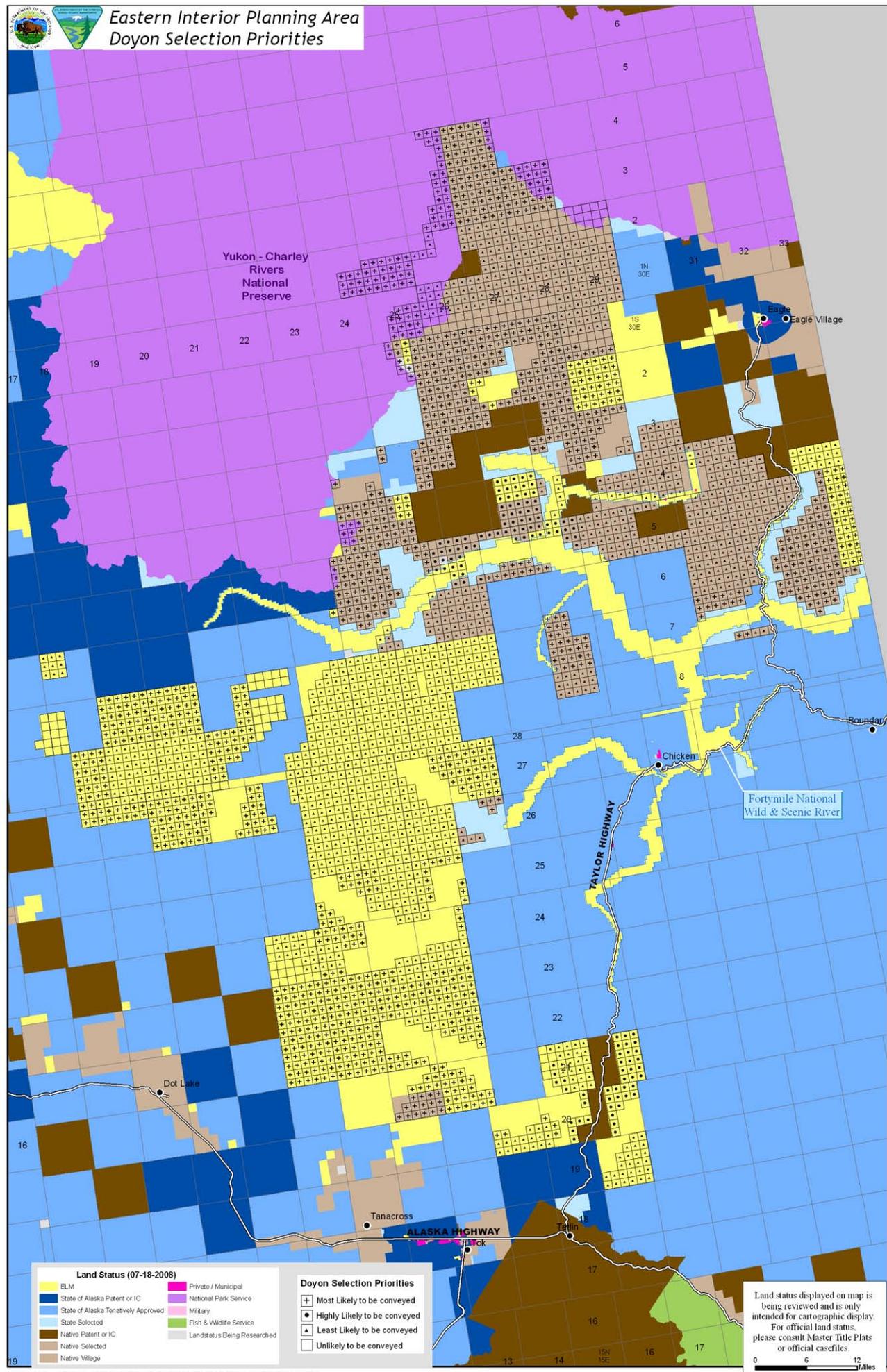
Surface Management Responsibility/Status	Surface Acres	Percentage of the Planning Area
BLM Public Lands (unencumbered)	4,738,000	15
State-Selected (BLM)	1,434,000	4.6
ANCSA Selected (BLM)	1,768,000	5.6
Both State & ANCSA Selected	34,000	
<b>Total BLM</b>	<b>7,940,000</b>	<b>25.2</b>
National Park Service Lands	2,519,000	8.1
Fish and Wildlife Service Lands	7,505,000	24
State of Alaska Lands	10,792,000	34.5
Private (including Native ANCSA Lands)	2,544,000	8.1
<b>Total Lands Within Planning Area</b>	<b>31,300,000</b>	
Split Estate (private surface/Federal subsurface)	64,300*	
* estimated based on acres of native allotments		

## **MAP 1.2**

### **Doyon Selection Priorities in the Fortymile Subunit**



**Eastern Interior Planning Area  
Doyon Selection Priorities**



Land Status (07-18-2008)	
Yellow	BLM
Blue	State of Alaska Patent or IC
Light Blue	State of Alaska Tentatively Approved
Brown	Native Patent or IC
Tan	Native Selected
Light Tan	Native Village
Pink	Private / Municipal
Purple	National Park Service
Light Purple	Military
Green	Fish & Wildlife Service
Grey	Landstatus Being Researched

Doyon Selection Priorities	
+	Most Likely to be conveyed
●	Highly Likely to be conveyed
▲	Least Likely to be conveyed
□	Unlikely to be conveyed

Land status displayed on map is being reviewed and is only intended for cartographic display. For official land status, please consult Master Title Plats or official casefiles.

Map 1.2 Doyon Selection Priorities in the Fortymile Subunit

## 1.3. Scoping Process

This section provides a description of the scoping process, the techniques that were used to notify the public, and a brief summary of the public meetings.

### 1.3.1. Description of Process

A Notice of Intent (NOI) to develop the Eastern Interior RMPs and associated EIS was published in the *Federal Register* (FR 2008). This initiated the public scoping period. A news release was submitted to local and regional media and posted on BLM's Web site.

The Eastern Interior FO hosted several public meetings. Agencies and the public were encouraged to submit oral and/or written comments regarding management of public lands in the planning area. Initially, the formal scoping period ended on July 1, 2008 (approximately 90 days). The scoping period was later extended until August 15, 2008 to ensure adequate time for comment submission. Although the BLM accepts comments at any time during the planning process, comments received during the scoping period are particularly helpful in guiding the development of alternatives. All of the comments received by September 22 were compiled, reviewed, organized, and analyzed. Issues were derived from the comments and documented in this report.

### 1.3.2. Public Notice

The RMPs/EIS and scoping meetings were announced through the *Federal Register*, paid advertisements, direct mailings, the Alaska BLM Web site, and media releases.

#### 1.3.2.1. Federal Register

The Eastern Interior RMPs/EIS public scoping process began with the publication of a NOI in the *Federal Register* on February 29, 2008 (Federal Register 2008). The NOI announced the BLM's intent to revise the RMPs for the Steese NCA and White Mountains NRA, to revise the Fortymile MFP, to develop an RMP for the Black River area, to prepare an EIS, and to conduct public scoping meetings.

#### 1.3.2.2. Mail list, Planning Flyers and Newsletters

An initial mailing list for this planning effort was compiled by updating a list of contacts developed for the 2005 White Mountains NRA plan amendment process. The mailing list for the Eastern Interior RMPs was updated with additional contacts collected at the Fairbanks Winter Trade Show in September 2007. A flyer about the upcoming planning process was distributed to this mailing list in October 2007. Additional contacts were collected at the April 2008 Spring Outdoor Recreation Show held in Fairbanks, at public scoping meetings held in the spring and summer of 2008, and from other mail lists.

An initial planning area flyer suitable for posting, emailing, faxing and mailing was created in October 2007. It was updated in February 2008 and posted on the Eastern Interior RMPs Web page under News. The planning flyer was used at the April 2008 Spring Outdoor Recreation Show booth to alert booth visitors about the plan and upcoming scoping meetings. The flyer text and map were updated several times over the spring and summer. A May 2008 version

of the flyer is posted on the Eastern Interior Planning Web page. The planning flyer was also used at BLM's 2008 Winter Outdoor Trade Show booth to brief show participants, residents in or adjacent to the planning area and other potentially interested individuals and organizations about the planning process.

Information concerning the planning effort was submitted to the Interior Trails Quarterly Newsletter (a private email newsletter dedicated to trail news) in February 2008 and subsequently printed in their March 2008 edition. Information about the planning effort was incorporated into Fortymile News, an Eastern Interior Field Office newsletter published in June 2008, targeting individuals and communities in the Fortymile River area.

An Eastern Interior RMP newsletter will be developed in winter 2008. It will summarize the results of scoping and provide other information about the planning process. It is expected to be available shortly after approval of this Scoping Report.

### 1.3.2.3. Media Releases and Public Service Announcements

BLM prepared a media release to introduce the project, announce the initial scoping meetings, and invite the public to provide input. The news release was issued on March 12, 2008 to local and regional newspapers, television stations, and radio stations. A second news release was issued on May 2, 2008, announcing additional scoping meetings and their locations. Both news releases were posted in the Newsroom section of the BLM Alaska web site. The March news release was resent to media on March 17 and March 24 as reminders of upcoming public scoping meetings. The news releases were sent to the media shown in Tables 1.3 and 1.4.

#### 1.3.2.3.1. Newspapers

Local and regional newspapers were the primary media used to disseminate information about the Eastern Interior RMPs scoping process. Other methods including e-mail, faxes, and flyers were used to supplement information dissemination. BLM also paid for the publication of a display ad in the Anchorage Daily News on April 4, 2008 to announce the public meeting in Anchorage; in the Fairbanks Daily News Miner on April 14 and 15 to announce the Tok, Delta Junction, Fairbanks, and Eagle meetings; and in the Mukluk News on June 5 and 19 to announce the Chicken meeting.

**Table 1.3. Publications where news releases were sent for the Eastern Interior RMPs planning process and scoping meetings.**

Publication	Location (Alaska)	Publication	Location (Alaska)
Alaska Newspapers	Anchorage	Frontiersman	Wasilla
Alaska Post	Anchorage	Empire	Juneau
Anchorage Daily News	Anchorage	Mukluk News	Tok
Associated Press	Anchorage	Reuters	Anchorage
Delta Wind	Delta	The Ester Republic (monthly)	Ester
Fairbanks Daily News-Miner	Fairbanks	The Sun Star	Fairbanks

### 1.3.2.3.2. Television and Radio

News releases were sent to the television and radio stations listed in table 1.4.

**Table 1.4. Television and Radio stations where news releases sent for the Eastern Interior RMPs planning process and scoping meetings.**

Station	Location (Alaska)	Station	Location (Alaska)	Station	Location (Alaska)
ARPN	Anchorage	KKED-FM (104.7)	Fairbanks	KUAC TV/Radio	Fairbanks
KAKQ-FM (101.1)	Fairbanks	KNIK-FM	Anchorage	KATN TV 2	Fairbanks
KBRW	Barrow	KSKA-FM	Anchorage	KTVA-TV	Anchorage
KENI-FM	Anchorage	KYAK-AM	Anchorage	KTVF TV 11	Fairbanks
KFAR-AM (660 am)	Fairbanks	KYSC-FM	Fairbanks	KXD TV Ch 13	Fairbanks
KFQD-AM	Anchorage	KUAC-FM	Fairbanks	KFXF Fox 7	Fairbanks
KIAK-FM (102.5)	Fairbanks	KIMO-TV	Anchorage		
KGOT-FM	Anchorage	KTUU-TV	Anchorage		

### 1.3.2.4. Public Notice

An interested party letter and information package was prepared and mailed to Federal, state, and local agencies; interest groups, including a national list of sporting groups (Table 1.5); Tribes; and members of the general public March 18, 2008. The mailing list was compiled using data maintained by the Eastern Interior FO. This letter informed the recipients of the planning process, the public scoping period, and the initially scheduled meetings. Additional meetings were scheduled later and notice of these was posted on the Eastern Interior RMPs Web page.

**Table 1.5. National sporting groups notified of the Eastern Interior Planning Process (BLM WO-250-2007-03)**

American Sportfishing Association	Delta Waterfowl Foundation	North American Bear Foundation	Safari Club International
Archery Trade Association	Ducks Unlimited	North American Grouse Partnership	Sand County Foundation
Association of Fish and Wildlife Agencies	Foundation for North American Wild Sheep	Pheasants Forever	Sporting Arms and Ammunition Manufacturers' Institute
Bear Trust International	Houston Safari Club	Pope and Young Club	Theodore Roosevelt Conservation Partnership
Boone and Crockett Club of America	Izaak Walton League of America	Public Lands Foundation	U.S. Sportsmen's Alliance
Bowhunting Preservation Alliance	National Assembly of Sportsmen's Caucuses	Quails Unlimited	Whitetail's Unlimited

Campfire Club of America	National Rifle Association of America	Quality Deer Management Association	Wildlife Forever
Congressional Sportsmen's Foundation	National Shooting Sports Foundation	Recreational Boating and Fishing Foundation	Wildlife Management Institute
Conservation Force	National Trappers Association	Rocky Mountain Elk Foundation	Orion-The Hunters Institute
Dallas Safari Club	National Wild Turkey Federation	Ruffed Grouse Society	Texas Wildlife Association

### 1.3.2.5. Web Site

The BLM established the Eastern Interior RMPs Web page on the Eastern Interior FO Web site in early March 2008. The Web page was updated regularly and included posting of all BLM news releases regarding the plan, a planning schedule, a schedule of scoping meetings, a map of the planning area, Frequently asked questions, the NOI, a planning flyer, and other supporting documents as they became available.

### 1.3.2.6. Other

The BLM used other available opportunities to inform the public of the Eastern Interior planning process. A planning flyer was emailed or faxed to the following organizations in October 2007 with a request to post the information and share with their customers and members.

<b>Organization/ Business</b>	<b>Loca- tion</b>	<b>Organization/ Business</b>	<b>Loca- tion</b>	<b>Organization/ Business</b>	<b>Loca- tion</b>
Alaska Dogmushers Assoc.	Fair-banks	Beaver Sports	Fair-banks	Fairbanks Snow Travelers	Cleary Summit
Alaska Fun Center	Fair-banks	Big Ray's Store	Fair-banks	Mountain Sports	Fair-banks
Alaska Outdoor Council	Fair-banks	Chatanika Lodge	Chatanika	Northern Alaska Environmental Center	Fair-banks
Alaska Ski-jor and Pulk Assoc.	Fair-banks	Cold Spot Feeds	Fair-banks	Northern Power Sports	Fair-banks
Alaska Tent and Tarp	Fair-banks	Compeau's	Fair-banks	Play it Again Sports	Fair-banks
Alaska Trappers Association	Fair-banks	Fairbanks Area Hiking Club	Fair-banks	Polaris Outpost	Fair-banks
Apocalypse Design, Inc.	Fair-banks	Fairbanks Paddlers	Fair-banks	Recreational Miners Association	Anchor-age

In April 2008, a flyer listing upcoming public meetings was developed and sent to the Fort Greely public affairs officer who in turn distributed it to the Delta Junction Chamber of Commerce, Delta Junction city officials and to the Ft. Greely community via email. Flyers were also emailed or faxed to all of the communities (city and/or tribal governments and other entities such as the Central Road House) where scoping meetings were scheduled. Recipients were asked to post them in public places.

Information about the planning process was provided at the BLM booth at the Fairbanks Winter Trade Show in September 2007, the Fairbanks Outdoor Show in April 2008, and the Fairbanks Winter Trade Show in September 2008. Additionally, interested parties were notified of the planning process by BLM staff attending regularly scheduled meetings for various special interest groups or advisory councils. For example, the BLM Resource Advisory Council, the Alaska Miners Association, the Eastern Interior Federal Subsistence Resource Advisory Council, the Yukon River Drainage Fisheries Association, and the Council of Athabascan Tribal Governments.

### 1.3.3. Public Meetings

BLM hosted eight public scoping meetings between April 10 and June 24, 2008 as summarized in Table 1.6. During these meetings, 122 people registered their attendance, with one person attending several meetings. The structure of the meetings varied, depending on the location but generally included both an open-house and a formal presentation. The meetings were generally held between 4:00 and 9:00 p.m., with the open-house in the afternoon and the presentation in the evening. The open-house was set up with presentation boards and maps. BLM specialists accompanied attendees around the room and were available to answer questions. This open-house format allowed BLM staff to interact with the public in a casual environment. The formal presentation, consisting of a power point presentation, question and answer, and public testimony generally began a 6:00 p.m. and lasted until all interested parties had an opportunity to make public comment or ask questions. In the smaller communities, the meetings were scheduled and formatted based on recommendations from local residents or the Tribal Council.

**Table 1.6. Public Meetings held during the Eastern Interior RMPs Scoping Period**

Meeting Date	Meeting Location	Number in Attendance
April 10, 2008	Campbell Creek Science Center, Anchorage	11
April 16, 2008	Tok School, Tok	11
April 17, 2008	Delta Junction Community Center, Delta Junction	8
April 22, 2008	Fairbanks North Star Borough Assembly Chambers, Fairbanks	49
May 8, 2008	Red Men Hall, Eagle	11
May 20, 2008	Community Hall, Chalkyitsik	7
May 22, 2008	Steese Road House, Central	9
June 24, 2008	Miner's Hall, Chicken	16
	Total	122

## 1.4. Cooperating Agencies

Cooperating agency status provides a formal framework for governmental agencies to engage in active collaboration with a Federal agency to implement the requirements of the National Environmental Policy Act (NEPA, 42 U.S.C. 4321, et seq.). Federal and state agencies, and local and tribal governments may qualify as cooperating agencies because of “jurisdiction by law or special expertise” (40 CFR 1501.6 and 1508.5).

To date, there are no formal cooperating agencies on the Eastern Interior RMP. BLM invited the State, the Fairbanks North Star Borough, and 12 Federally recognized Tribes to consider becoming a cooperating agencies. The Borough and most Tribes had not responded at the time of writing this report. Chalkyitsik Village has requested cooperating agency status. BLM is currently working with the Tribe to develop a cooperative relationship.

The State declined formal cooperating agency status. However, BLM and the State are coordinating closely through an assistance agreement. The Alaska Department of Natural Resources (DNR) provides a staff position, who acts as the BLM liaison for planning. The DNR acts as a state clearinghouse for BLM by soliciting and coordinating planning input from the 15 state agencies listed in Section 1.5.1. Agency Coordination. Additionally, the DNR provides technical and consistency review of draft documents.

## **1.5. Collaborative Planning**

Collaboration is a process in which interested parties, often with widely varied interests, work together to seek solutions with broad support. Collaboration mandates methods, not outcomes; and does not imply that parties will achieve consensus.

### **1.5.1. Agency Coordination**

Although no scoping meetings were held specifically for agencies, BLM has contacted key Federal, State, and local agencies to initiate coordination and collaborative efforts that will continue throughout the RMPs/EIS process. Representatives of various Federal, State, and local agencies attended public meetings. Staff from the DNR, FWS, NPS, and Fairbanks North Star Borough were invited to participate in BLM land use planning training courses held in Fairbanks but, only the State (DNR) participated.

The BLM has contacted the FWS and the National Marine Fisheries Service (NMFS) regarding threatened and endangered species consultation and essential fish habitat determinations. The FWS responded with a memo on June 23, 2008 stating that there are no threatened or endangered species found in the planning area and that further consultation under Section 7 of the Endangered Species Act is not necessary at this time. The NMFS has not responded as of the date of this report.

The Environmental Protection Agency (EPA), Citizen's Advisory Commission on Federal Areas, and the State of Alaska (through the Department of Natural Resources) submitted comments to the Eastern Interior FO through the scoping process. As of the date of this report, contact has been made with the following agencies:

- U.S. Fish and Wildlife Service
  - Fairbanks Fish and Wildlife Service
  - Tetlin National Wildlife Refuge (NWR)
  - Yukon Flats NWR
  - Arctic NWR
- National Marine Fisheries Service
- National Park Service
  - Yukon Charlie Rivers National Park and Preserve
- Environmental Protection Agency
- State of Alaska
  - The Governor's Office
  - Citizen's Advisory Commission on Federal Areas
  - Department of Natural Resources (DNR) - Acted as a clearinghouse for the following State Agencies
    - Division of Mining, Land, and Water
    - Division of Forestry
    - Division of Geological and Geophysical Surveys

- Division of Parks and Outdoor Recreation
- Division of Oil and Gas
- State Historic Preservation Office
- Office of Project Management and Permitting
- Department of Fish and Game
- Department of Public Safety
- Department of Economic Development
- Department of Environmental Conservation
- Department of Transportation and Public Facilities
- Department of Commerce, Community, and Economic Development
- Attorney General’s Office
- Fairbanks North Star Borough
  - Planning Department
  - Parks and Recreation

## 1.5.2. Tribal Consultation

In Alaska, the villages recognized under the ANCSA were designated as tribes by the Department of the Interior in 1993, and were confirmed by Congress pursuant to the Federally Recognized Indian Tribe List Act of 1994 (Pub. L. 103–454; 108 Stat. 4791, 4792). The Eastern Interior planning area includes 12 federally recognized tribes.

**Table 1.7. Federally Recognized Tribes in the Eastern Interior Planning Area**

Beaver Village	Native Village of Fort Yukon
Birch Creek Tribe	Healy Lake Village
Chalkyitsik Village	Northway Village
Circle Native Community	Native Village of Stevens
Village of Dot Lake	Native Village of Tanacross
Native Village of Eagle	Native Village of Tetlin
<b>Tribe</b>	<b>Tribe</b>

In addition, Executive Order 13175, “Consultation and Coordination with Indian Tribal Governments,” requires the BLM to consult with tribal governments on Federal matters that significantly or uniquely affect their communities. The EPA’s Environmental Justice guidance of July 1999 stresses the importance of government-to-government consultation. Through this government-to-government relationship, BLM may obtain data from interviews with tribal elders, tribal records on cultural resources, and relevant research. The planning area encompasses lands where BLM will not be making decisions, including tribal lands.

BLM initiated consultation with the federally recognized tribes in the planning area by certified mail at the beginning of the scoping period. BLM sent a second letter to the tribes approximately 30 days before the end of the scoping period, to remind them that the end of the formal scoping period was approaching. As part of the scoping effort, BLM attempted to contact the tribes by telephone, letter, and fax to initiate government-to-government consultation and offer the opportunity to be a cooperating agency in the planning process.

To date, only one tribe, Chalkyitsik Village, has requested consultation. As a result, BLM held a meeting in Chalkyitsik on May 20, 2008. Members of the Tribal council provided oral and written comments at that meeting. Additionally, Chalkyitsik Village appointed two members of the Tribal Council to be the points of contact for the planning process. Chalkyitsik Village

recently requested cooperating agency status. BLM is working with Chalkyitsik Village to formalize the cooperative relationship.

In addition to contacting the Tribes, BLM contacted staff at the Tanana Chiefs Conference, a traditional tribal consortium of 42 villages of interior Alaska and Doyon, Ltd. the regional Native Corporation. A BLM staff member attended the Council of Athabascan Tribal Governments meeting in Fort Yukon on May 14, 2008. Tribal leaders in attendance at the meeting were informed of the planning process, ongoing government-to-government consultation requests, and the opportunity to become a cooperating agency. Additionally, BLM offered to meet with village tribal councils and/or to hold public meetings in the villages if requested by the Tribal councils.

### **1.5.2.1. Tribal Issues**

The Federally recognized Tribes within the planning area are small and depend on a subsistence-based economy. Although few scoping comments were received from Tribes, those submitted by the Chalkyitsik Village and tribal members attending other public meetings likely fairly representative. Major issues or concerns include:

- The need for additional research in the Black River region regarding subsistence use, hunting, and fishing, and including the use of Traditional Ecological Knowledge—a recommendation was made to look at the Council of Athabascan Tribal Governments land use documents for the planning area;
- Mineral entry—opening new areas to mining; also keeping areas closed to mining
- Access, including creating transportation routes or corridors, and limiting access to OHVs
- Fire management, allowing the natural fire regime to continue, problems as a result of erosion after fires
- Water quality issues, especially with regard to the headwaters of the Black River, which is the primary water supply for Chalkyitsik
- Protection for historic hunting and trapping trails
- The protection of subsistence resources, including the Fortymile and Porcupine caribou herds, moose, salmon, whitefish, and pike

### **1.5.3. Public Interaction**

BLM continually works with the public, other resource management agencies, and jurisdictions. The relationships established with these entities have developed from the day-to-day management activities conducted by BLM and previous planning efforts. BLM will continue to encourage public involvement throughout the planning process by hosting or participating in informal community meetings, conducting communications through electronic mail, and providing information by means of the Eastern Interior RMPs Web page and other venues. BLM conducted Recreation Focus Groups through the University of Alaska-Fairbanks in October 2008 to obtain additional public input on recreation management in the planning area. This data will be used to help formulate recreation alternatives.

Through the University of Alaska Fairbanks, BLM conducted visitor use surveys in the White Mountains NRA, Steese NCA, and along the Taylor Highway in 2006-2008. The results of these studies will assist the BLM in developing a range of recreational opportunities in the planning area. The surveys used a two-phase approach. The first phase was a short onsite survey that gathered information about the visitors primary destination, the activities they intended to do at that destination, along with the primary activity, and the motivations for visiting their primary

destination. The second phase was a follow up mail survey. The mail survey obtained more detailed information on trip characteristics, the most satisfying zone, experiences obtained in the most satisfying zone, and benefits that should be the focus of management. This study design allowed BLM to assess:

- Experiences sought in the White Mountain NRA, Steese NCA, and Taylor Highway
- Experiences obtained in the White Mountain NRA , Steese NCA, and Taylor Highway
- Settings that facilitated these experiences
- Benefits to be managed for
- Consistency between expectations and obtained outcomes

# **Chapter 2. Issue Summary**

## 2.1. Comment Summary

### 2.1.1. Method of Comment Collection and Analysis

The public submitted comments by speaking at public meetings or by composing written comments in a letter, comment form, or an email message. Oral comments at public meetings were recorded and later transcribed into written form. Oral comments were summarized for each meeting and posted on the Eastern Interior RMPs Web page in the form of scoping meeting reports.

During scoping, BLM received 102 submittals from various agencies, individuals, and/or special interest groups. Of these comment submittals, 35 were oral comments made by individuals, 24 were form letters, and 43 were letters (submitted by either email or conventional mail). All of the submittals received were organized and reviewed, and the comments were analyzed to identify the preliminary issues to be addressed during the preparation of the RMPs and EIS. Two additional letters were received well after the end of the scoping period. These comments will be considered during development of the Eastern Interior RMPs, but are not included in section 2.1.2, Summary of Public Comments. In general, the comments from these two letters were similar to or the same as those received earlier.

Comments from each submission were entered into an Excel database. Each submittal was coded to identify the submitter (e.g., agency, organization, group, or individual), geographic location of submitter (based on address given in the letter or email, or the location of the public meeting for oral comments), and issue category. Seventy percent of all comments received were from residents of Alaska or people physically present in Alaska, 19% were from residents of other U.S. states, and 11% percent were undetermined.

### 2.1.2. Summary of Public Comments Received

During the scoping period (February 29-April 15, 2008) BLM received 67 written submissions and oral comments from approximately 35 individuals at 8 public meetings. Submissions included 24 form letters sent mostly by email. The majority of the comments came from Alaska residents. Besides those from Alaska, comments came from 14 other states - these were primarily email form letters.

**Table 2.1. Number of Submissions by Respondent Type**

<b>Affiliation</b>	<b>Number of Submission</b>
Individual	81
Organization	16
Business	0
Federal Agency	1
State Agency or Organization	2 (submissions of 15 State Departments through DNR counted as one agency)
Local Agency	0
Tribal Government	2
Elected Officials	0 (not including Tribal elected officials)
<b>Total</b>	67 written and 35 oral

**Table 2.2. Number of Submissions by State**

State	Number of Submissions	State	Number of Submissions	State	Number of Submissions
Alaska - written	37	Indiana	1	Pennsylvania	1
Alaska - oral	35	New Jersey	1	South Carolina	1
California	5	New Mexico	1	Texas	1
Delaware	1	New York	1	Washington	2
Iowa	1	North Carolina	1	Unidentified	11
Illinois	1	Oklahoma	1	TOTAL	102

### 2.1.2.1. Summary of Comments by Topic

There were 584 individual comments parsed out of the 67 written comment submissions and 35 oral comments provided at public meetings. A database was developed and individual comments were put into one of 20 subjects. Some were further subdivided into sub-categories as shown below. Comments are listed by category in Appendix B.

**Table 2.3. Number of Individual Comments per Planning Theme**

Major Subject (# comments)	Number of comments by Sub-Category	Number of Individual Comments
Soil Water and Air (33)	Climate Change	16
	Water Quality	11
	Air Quality	1
	Soil/Erosion	1
	Other water Issues	4
Fish (23)	Salmon	12
	Other fish issues	11
Wildlife (23)	Predator Control	4
	Porcupine Caribou	3
	Other wildlife issues	16
Fire Management (6)		6
Cultural and Paleontological Resources (6)		6
Visual Resource Management (3)		3
Wilderness (6)		6
Forest Products/Vegetation (5)		5
Noxious and Invasive Plants (8)		8
Minerals (59)	Locatable Minerals	5
	Leasable Minerals	6
	General or Uncategorized	48
Recreation (34)	White Mountains NRA	6
	General or Uncategorized	28

<b>Major Subject (# comments)</b>	<b>Number of comments by Sub-Category</b>	<b>Number of Individual Comments</b>
Travel Management (110)	White Mountains NRA	6
	17b Easements	6
	RS 2477 Rights-of-way	4
	General or Uncategorized	96
Lands and Realty (73)	ANCSA 17(d)(1) withdrawals	14
	Other withdrawals	4
	Conveyances	7
	Alaska Natural Gas Pipeline	3
	Navigability	7
	Doyon Exchange/Right-of-way	16
	General	23
Special Designations (19)	National Natural Landmarks Program	1
	Research Natural Areas	5
	Areas of Critical Environmental Concern	2
	General	11
Pinnell Mountain Trail (1)		1
Wild and Scenic Rivers (12)	Fortymile National Wild and Scenic River	5
	Beaver National Wild River	2
	Birch Creek National Wild River	1
	General	4
Social and Economic (5)		5
Subsistence (44)		44
Process (85)	Public Outreach	11
	Combining RMPs	12
	Tribal Consultation	7
	Other	55
General (41)	General conservation concern	10
	Black River	6
	General	25
<b>Total</b>		<b>584</b>

## 2.2. Issues Identified During Scoping

Public comment analysis resulted in the identification of 10 planning issues that will be addressed during development of alternatives. An issue is defined as a matter of controversy or dispute over resource management activities or land use that is well defined and/or topically discrete, and entails alternatives between which to decide. Usually, the causal relationship between the activity or use and undesirable results are well defined or can be documented, and the level of controversy is high enough to merit further analysis. Statement of planning issues orients the planning process so that interdisciplinary thought, analysis, and documentation is directed toward resolving the planning issues during preparation of the RMP.

In addition to the 9 planning issues, concerns related to the planning process such as document format, public outreach, and consultation were also raised. These are discussed under Section 2.3. These will be addressed during the planning process but will not assist in development of alternatives.

Comments received during scoping also raised management concerns. A management concern is an apprehension or point of dispute involving resource management activity or land use where the relationship between the activity or use and potential undesirable effects is apparent, but not well defined. Generally a concern is of note to a few individuals, as opposed to a planning issue, which is of general importance. Many of the concerns raised will be addressed but are not enumerated in this report. For a full list of the comments, including management concerns, see Appendix B.

### **2.2.1. Issue 1: Climate Change**

*How will the Eastern Interior RMPs address the impacts of climate change and the development of land management strategies that reduce impacts, incorporate appropriate monitoring, and allow for adaptive management to respond to changes over time?*

Several individuals and groups identified climate change as an important issue to be addressed in the Eastern Interior RMPs. Specific issues of concern included potential impacts on Yukon River salmon, monitoring changes in water flow and quality in the many rivers within the planning area, and the loss of wetlands and lakes due to melting of permafrost. Comments recommended that the best available science be used to address climate change impacts; that climate change impacts are addressed comprehensively throughout the EIS; that the BLM recognize the need for land management strategies that anticipate and monitor for changes in land cover potentially due to climate change; and that the BLM consider potential changes to climate due to land use decisions and resource development. It was noted that opportunities to document baseline environmental conditions and monitor for climate change indicators such as wildlife migration patterns and permafrost depths may exist within the planning area. The BLM was also urged to collaborate and coordinate with other agencies and with educational institutions to conduct research and monitoring of climate change. Some comments also recommended a precautionary approach to management, given the uncertainty of how climate change may impact resources in the planning area.

One comment recommended that the following points of discussion be incorporated into the RMPs: provide training on climate change and variability for all resource managers; consider climate change and variability as a component of long-range management plans and strategies, as well as prioritizing adaptive management; implement monitoring and assessment programs for impacts to wildlife and wildlife habitats; educate the public about climate change and its effects on Alaska; establish and maintain migration corridors that allow species movement and vegetation shifts among islands of suitable habitat; increase buffer zones around identified critical habitat in order to increase options for species under various climate change scenarios; protect riparian and wetland communities to promote resilience of these important and susceptible habitats; make the reduction and elimination of human-induced synergistic impacts a top priority for land and resource management; and educate the public on the respiratory health consequences of increased fires and monitor and mitigate impacts to human health.

Commentors were also concerned about potential impacts of climate change on fish and wildlife habitat and populations. According to Alaska Department of Fish and Game's letter to the Alaska Climate Impact Assessment Commission as quoted in one comment letter, "Changes in

species distribution and behavior may necessitate adjustments of management plans and harvest regulations; the effect of climate change on wildfires is of great interest and concern, since over much of Alaska fire is the predominant habitat change agent and since our main big game species are fire adapted in different ways. Similarly, we may see a trend where the boreal forest will transition toward grasslands, which would favor a different species mix; it will be important to monitor species expanding their ranges into Alaska that could impact hunted species and other wildlife with conservation concerns." Wildlife management must include monitoring, habitat considerations and studies, cooperative management with adjacent land holders, and a holistic approach to ensure diversity of the system.

## 2.2.2. Issue 2: Water Quality

*How will the Eastern Interior RMPs protect existing water quality and improve water quality in areas that are degraded from past or ongoing activities?*

Several agencies, groups, and individuals identified water quality as an important issue to be addressed in the Eastern Interior RMPs. Specific concerns included identification and clean up of point and non-point source pollution sites along the Yukon River; the maintenance of good water quality in the Black River, which is the water source for the Village of Chalkyitsik, and important fish habitat; water quality in Birch Creek National Wild River (WR); identification of all source water protection areas and measures to be taken to protect these areas. It was noted that the EIS should disclose which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters.

The Steese NCA was established under Section 401 of ANILCA. One of the special values to be considered in planning and management of the area is Birch Creek. The Birch Creek National WR was established by Section 603 of ANILCA which amended Section 3(a) of the Wild and Scenic Rivers (WSR) Act. Scoping comments on Birch Creek noted that placer mining operations have impacted water quality the entire length of Birch Creek. The degradation of the values for which a river was designated is prohibited under section 10(a) of the WSR Act. Gold is the most valuable mineral in the NCA and with increases in the market value of gold there is an expected increase in the operation of existing valid claims. With increased mining operations there should be more stringent regulations to ensure that water quality and the aquatic system are not adversely impacted.

Additionally, the Yukon River Salmon Act Treaty (YRSA), ratified in 2002, mandates habitat protection. Specifically that respective water quality standards in Canada and the U.S. be maintained and enforced.

The State suggested specific measures be incorporated into the RMPs to reduce non-point source pollution, to reduce erosion, and to manage stormwater runoff in the planning area. For example: design projects, including roads, trails, and culverts to protect the natural integrity of waterbodies, riparian vegetation, and natural drainage systems; limit disturbance activities such as clearing and grading, and cut and fill to reduce erosion and sediment loss; provide waste management facilities for human and solid wastes at high use areas; retain and protect natural vegetation; and prior to land disturbance, prepare and implement an approved erosion and sediment control plan.

### 2.2.3. Issue 3: Fisheries Management

*How will the BLM manage aquatic habitats that support fish populations (both salmonid and non-salmonid) which are important for subsistence, recreation, commercial use, and international treaty obligations?*

In the *Preplan Analysis for the Eastern Interior RMP/EIS* (BLM 2007), BLM identified Fisheries Management as a potential issue. Two of the questions raised during pre-planning were: 1) What are the desired conditions for habitat to support harvestable populations of salmon? and 2) How will we identify and protect key areas for resident species? During scoping, agencies, groups, Tribes, and individuals identified management of fish habitat, particularly salmon, as an important issue to be addressed in the Eastern Interior RMPs. Comments from the State noted that 75% of rural interior Alaska households harvest fish while 92% use fish for subsistence purposes (ADF&G 2000).

Under the terms of the YRSA, the U.S. is bound to pass a set number of Chinook and fall chum salmon across the Canadian border to provide for Canadian harvests and escapement needs. Chinook salmon escapement requirements have not been met for the past two years. The YRSA also mandates habitat protection. Specifically that: salmon should be afforded unobstructed access to and from, and use of, existing migration, spawning and rearing habitats; respective water quality standards should be maintained and enforced; productive capacity of the salmon habitat on both sides of the Alaska-Yukon border should be maintained; and should access be obstructed, water quality standards be degraded or productive capacity of the salmon habitat be diminished to a degree that affects attainment of the objectives of the YRSA, the Yukon River Panel may recommend corrective actions which may include adjustments to fishing patterns, border escapement objectives and guideline harvest ranges. Management measures adopted in the RMPs must be compliant with the YRSA.

It was noted that commercial salmon harvests provide one of the only sources of income in many Yukon River villages and commercial harvests have declined in recent years. As with subsistence fisheries, impacts to commercial salmon fisheries should be looked at on a riverwide basis, as any impacts to the salmon in the Eastern Interior region will be felt throughout the watershed. Impacts to commercial fisheries should be analyzed not on the basis of economic value alone, but on the role of these fisheries as sources of employment in the affected communities. The Yukon River Chinook are currently listed as a 'stock of yield concern' by the Alaska State Board of Fisheries.

Other areas mentioned frequently in scoping comments were the Black River and the Salmon Fork. These watersheds support several species of fish including grayling, northern pike, sheefish, whitefish, and three species of salmon. Comments from the Native Village of Chalkyitsik noted that the Black River is the only river in this area that produces whitefish, an important subsistence resource for the village. The Black River is a highly utilized subsistence fishing area for local villages and rural residents of the region. As one comment noted, "they don't call it the Salmon Fork for nothing. It is a significant spawning stream for two species of salmon.... The people of Chalkyitsik depend utterly that fall chum run to meet some of their subsistence needs. Later in the fall when the ice is on the river people in Chalkyitsik set nets under the ice for coho salmon." Additionally, "there is historic photographic documentation of king salmon spawning populations in the Salmon Fork of the Black River." One comment noted that a significant salmon spawning hole is located on the Salmon Fork and that this area is similar in importance to the spawning hole on the Fishing Branch at the headwaters of the Porcupine River in the Yukon. The Yukon Government has provided protection to the Fishing Branch by designating it as the

Fishing Branch Ni'iinlii Njik Park. BLM received three nominations for the Salmon Fork of the Black River to be considered as an Area of Critical Environmental Concern (ACEC) in the RMP. Additionally, BLM recommended ACEC designation for this area in an open file report completed in the 1980's (Collin et al. 2002).

## **2.2.4. Issue 4: Wildlife Management**

*How will the BLM manage habitats that support wildlife populations which are important for subsistence and recreational use?*

In the *Preplan Analysis for the Eastern Interior RMP/EIS* (BLM 2007), BLM identified management of the Fortymile Caribou herd as a potential concern. The Fortymile Caribou Herd is another major subsistence resource in the planning area. Some of the questions raised during pre-planning were: 1) How will we ensure that important habitats for the Fortymile Caribou Herd on BLM-managed lands are conserved? and 2) How will we maintain sufficient habitat to support harvestable populations of wildlife for both subsistence and recreational use?

Several agencies, groups, Tribes, and individuals identified wildlife habitat management and potential impacts to wildlife as important issues to be addressed in the Eastern Interior RMPs. Comments from the State noted that 69% of rural interior Alaska households harvest wildlife while 88% use wildlife resources (ADF&G 2000). Of particular importance in this area are potential impacts to authorized uses of Fortymile caribou and moose populations of Game Management Units 12, 20, and 25. Several individuals also noted the importance of the planning area as winter habitat for the Porcupine Caribou Herd. In the Native Village of Chalkyitsik, it was noted that traditional ecological knowledge indicates that the Black River and Salmon Fork are important for maintaining the moose population in the Yukon Flats.

Wildlife diversity is critical for healthy systems and wildlife do not recognize political boundaries. In order to maintain or enhance populations and meet habitat goals on both BLM and adjacent lands, efforts must be coordinated with other agencies. For example migration corridors and species enhancement goals, such as the Fortymile Caribou Herd, require close partnerships with stakeholders.

## **2.2.5. Issue 5: Subsistence**

*How will the BLM manage public lands to provide continued access to subsistence resources and to support subsistence based economies in local communities?*

In the *Preplan Analysis for the Eastern Interior RMP/EIS* (BLM 2007), BLM identified subsistence as a potential issue. For thousands of years, Alaska Natives relied on fish, wildlife and other wild resources for food, shelter, clothing, transportation, and trade. Today, many rural Alaskans continue to live off the land and waters, depending upon wild plants, fish and animals as reliable and economic sources of food. For many Alaskans, the ability to continue these subsistence activities is also an important part of their cultural heritage. Title VIII of ANILCA was designed to ensure continued access to subsistence resources on Federal land. Preservation and availability of subsistence resources is an issue of extreme importance to residents of the planning area.

During scoping the BLM received many comments on subsistence from individuals living within the planning area, Tribal representatives, agencies, and groups. As noted in the State's comments,

lands in the planning area managed by the BLM are important for customary and traditional uses of fish and wildlife resources among a number of areas and communities where subsistence is a principal characteristic of the economy, culture, and way of life. These lands also serve as important habitat for resources used for subsistence purposes by residents of the planning area and those from elsewhere in Alaska.

Many were concerned that the traditional use of BLM lands, for trapping, hunting, and fishing continue. These activities should not only be allowed, but also encouraged. The planning process must take into consideration impacts to federally-protected subsistence users. Impacts to subsistence access and resources should be avoided or mitigated. In addition to potential impacts from development and site-specific management prescriptions, the impacts of climate change on subsistence resources and practices need to be considered. Changes in habitat are predicted to stress wildlife, waterfowl and fish populations that serve as subsistence resources. Changes in habitat and species diversity may change what subsistence foods are available. Some populations may increase in abundance while others may alter their migration and become unavailable. Traditional means of travel may be impacted because of the potential for thinner ice on lakes and rivers, and shorter seasons of frozen ground.

The BLM received numerous comments on the Black River and its importance for subsistence. For example: the lands in the upper Black River "comprise the subsistence base for the people of Chalkyitsik. The Black River (Drahnjik) and its major tributary Salmon River (Teetrahnjik) flow through BLM lands that will be impacted by the RMP. The lives of the people of Chalkyitsik are inextricably connected to these rivers, the surrounding lands and their resources. Their association with these lands goes way back into a distant past, and the rivers and lands are more than just a source of subsistence resources. They provide a sense of community, a spiritual grounding, and hope for the future." "The importance of the Black River lands for subsistence by local people should be well described in the plan and should include the value of this area as critical habitat for migratory species, such as salmon, that are used for subsistence well beyond the region itself." "The Black River is a highly utilized subsistence hunting and fishing area for local villages and rural residents of the region. This area should be offered lasting protection to ensure these opportunities exist."

## **2.2.6. Issue 6: Minerals Management**

*What lands currently withdrawn from mineral entry, location, and leasing should be opened, and what lands should remain closed?*

Management of mineral resources was considered a potential issue in the *Preplan Analysis for the Eastern Interior RMP/EIS* (BLM 2007). Most if not all of the planning area is closed to mineral location and leasing by various withdrawals, including ANCSA 17(d)(1) withdrawals. This has limited mineral exploration and development to pre-existing mining claims and leases in certain areas. Both the Fortymile MFP (BLM 1982) and the Steese RMP (BLM 1986) recommended opening portions of these areas to mineral entry and in the case of the Steese, mineral leasing. However, these decisions were never implemented.

During scoping, the BLM received numerous comments related to management of mineral resources from individuals, groups, Tribal representatives and agencies. Some favored lifting existing withdrawals to allow for mineral entry and leasing to allow access to mineral resources in the planning area; while others recommended retaining withdrawals to protect resources.

Specific areas that commentors recommended keeping closed to mineral entry and leasing included the upper Black River, the Steese NCA, the White Mountains NRA, and the three wild and scenic rivers. Some sample comments are: Mineral and oil and gas development should not be allowed on the upper Black River; necessary withdrawals should be put in place to protect the Chalkyitsik municipal water supply and the Old Salmon Village site; wild and scenic rivers, national conservation areas and national recreation areas are special designations that warrant special protections and management; and close all designated ACECs to mineral development to protect the values of these areas. Another commentor noted "If you go mining in that area [Upper Black River Subunit], all the streams up in that area runs into Black River here. The old Black River runs in here, Grayling River, Drifting Snow, Salmon River, every river in that area runs into this river [Black River] and that's a vital area that we're looking at... are we looking at trying to protect this area for future generation of use, or are we just going to go ahead and develop it and forget about everything else? ...That's the area that most people go into to hunt in the fall. But we know that if we need something to subsist off of, that's the area that we're going to get it and if we go developing it and ruining that area then we're going to end up contaminating our rivers."

Other concerns included the need for cumulative impact analysis, potential impacts of mining operations if areas were opened, and consideration of withdrawal revocation on a case-by-case basis. For example: "The draft plan should provide a thorough analysis of the various "D-I" lands in the planning area and identify environmental impacts that would likely occur if this classification were lifted or modified. Such analysis should include potential impacts to subsistence, wildlife, fisheries, watersheds and the goals and purposes of neighboring conservation units," "recommendations for revoking withdrawals essentially should be done on a really case-by-case basis with the specific cumulative impacts analysis of how that would affect surrounding lands, communities, wildlife," in regards to the Black River and Salmon Fork, anything that affects the health of the stream, the water quality of stream can affect the success and productivity of salmon. So whatever designation eventually is decided for that watershed I would like to see that threats to water quality like mining be taken into consideration."

Some of the comments the BLM received that were in favor of lifting the withdrawals include: "BLM must resolve the land status issues and open lands currently closed to mineral and energy resource exploration and development. This can best be accomplished by working to revoke the withdrawal orders issued under Section (d)(1) of ANCSA ...and evaluating all areas now closed to mineral entry for removal of the closures"; "BLM should comply with the conclusions of the previous Steese NCA Plan and Final EIS and open the lands to mineral entry"; "Significant mineral studies were completed in the Steese NCA in 1987, 1988 and 1989, through special congressional appropriations, by a combined effort of the USGS, State of Alaska Division of Geological and Geophysical Surveys, and the U.S. Bureau of Mines. These studies reaffirmed that significant mineral resources exist in the Steese NCA and that there is also significant potential for new discoveries"; "the new RMP should include a lifting of those PLO's directly affecting the Fortymile basin"; the BLM should "review and recommend revocation of withdrawals made under ANCSA that were intended to be temporary in nature"; "the Plan must focus especially on the pipeline corridor for removal of Outdated Withdrawals. Lands needed for the gas pipeline must be retained and sufficient closure width must be retained so as not to restrict gas pipeline construction"; and "I don't think anybody in the community [of Central] would be against potentially opening up some of the Steese area for locatable mineral entry".

Additionally, some commentors were supportive of small mining operations, but not larger operations: "it is really important that small mom and pop type placer mining be given an opportunity to continue. I think all the safeguards of water quality are all in place but I would

hate to see that stripped away from people as an opportunity... access is slowly slipping away from the private individual to go out there and try and do something"; and "dredging is one of the lowest impact forms of mining there is and prohibiting dredging on the Mosquito Fork seems mostly like tripping a development because these are resources that could be exploited in a very reasonable fashion leaving not a visible mark on the scenery".

### **2.2.7. Issue 7: Rights-of-way Management**

*How would access issues involving a Victoria Creek road and/or pipeline be managed?*

Doyon, Limited (Doyon) is an Alaska Native Regional Corporation established under the authority of ANCSA, Congress granted Doyon land entitlements within an area that became the Yukon Flats NWR. Doyon has ownership interests in approximately 2.14 million acres within the boundaries of the Refuge, including the surface and subsurface estates of 1.25 million acres of land, and the subsurface estate of another 890,000 acres. The Yukon Flats Refuge is located adjacent to the northern boundaries of the White Mountains NRA and Steese NCA.

Doyon and Yukon Flats NWR, Alaska Region, have agreed in principle to provide Doyon title to some lands that may hold developable oil and gas resources. In exchange, the U.S. would receive lands currently owned by Doyon within the NWR boundary (referred to as the Doyon Exchange). To evaluate the Doyon Exchange, the FWS prepared and published a Draft EIS in January 2008 and accepted comments through May 19, 2008. The projected date for a decision on the Doyon Exchange has been delayed until the fall of 2009 due to additional time needed to obtain final appraisals.

If Doyon discovered developable oil and gas resources, the most likely scenario to transport the oil to market is a pipeline from Doyon lands south of Birch Creek Village west to the Trans-Alaska Pipeline. Two potential routes have been identified. One of those routes is south to the NWR boundary and then west through the Victoria Creek drainage in the White Mountains NRA. The other potential route crosses the NWR through the foothills north of the White Mountains.

The BLM received many comments on the Doyon Exchange and potential Victoria Creek right-of-way (ROW) during scoping for the Eastern Interior RMPs. The majority of the comments were in opposition to a ROW in the White Mountains. Reasons for opposition included impacts to wildlife, impacts to Beaver Creek National WR, impacts to recreation, incompatibility with the management goals for the Beaver Creek National WR and the White Mountains NRA, the need to consider this right-of-way in the cumulative impact analysis, and the potential for improper NEPA process regarding this issue while developing the EIS for the Eastern Interior RMPs.

The BLM also received some comments supporting effective transportation planning and recommending broad latitude to allow development of new transportation infrastructure. Broad latitude is needed because it is difficult to predict where and what types of transportation infrastructure will be needed. The State requested that all proposed rights-of-way be considered on a case-by-case basis over the life of the RMP. If any ROW Avoidance Areas are proposed, BLM should make certain that the terms and conditions associated with those corridors are consistent with Title XI of ANILCA which recognized that Alaska's transportation and utility network was largely undeveloped and included a standard process for consideration of transportation and utility corridor proposals that applies to conservation system units, national recreation areas and national conservation areas per Section 1102(4)(A). The State requested that

the plan not preclude any transportation routes especially in light of the Doyon Exchange, which may lead to a ROW application in the White Mountains NRA.

The potential for a ROW application in Victoria Creek area is within the scope of the Eastern Interior RMPs in the sense that the RMPs will make broad decisions on where ROW applications will be considered and under what terms ROW will be granted. Section 1110(b) of ANILCA requires that the BLM allow "adequate and feasible access for economic and other purposes" to State and private land that is within or effectively surrounded by one or more conservation units, national recreation areas, or national conservation areas. Additionally, since the Doyon Exchange EIS process is ongoing, it is likely that the BLM will consider a ROW application reasonably foreseeable. As such, the impacts of a ROW would need to be evaluated in the cumulative impact analysis. However, it is unlikely that the RMP would make a decision on a specific ROW.

Regardless of the outcome of the exchange, Doyon could request a ROW across the White Mountains NRA to access their private land and subsurface estate that they already own within the NWR. This would not likely happen until after completion of the Eastern Interior RMPs. If Doyon requests a ROW through the White Mountains NRA, the BLM anticipates that it will be the lead or co-lead agency for the required EIS. The BLM will make a decision on the ROW application at that time, following site-specific analysis.

## **2.2.8. Issue 8: Travel Management**

*How should BLM manage travel to provide access for recreation, commercial uses, and general enjoyment of the public lands while protecting natural and cultural resources?*

Travel Management is a comprehensive program that addresses all types of access and transportation needs: motorized, mechanized, animal powered, and human powered. Comments regarding easements and RS 2477 rights-of-way were included in this category.

As noted in the *Preplan Analysis for the Eastern Interior RMP/EIS* (BLM 2007), use of motorized off-highway vehicles (OHVs) is increasing throughout the planning area and is a concern for managers, interest groups, and the general public. OHVs, including four-wheelers, Argos, and tracked vehicles are used in Alaska predominantly for hunting and fishing access, but recreational use of OHVs is increasing. Winter use of snowmachines for recreational activities and subsistence access to hunting areas has also increased. Using newer and more powerful machines, riders have expanded use to areas that were not frequently used in the past. Off-road vehicle area designations of "open," "limited," or "closed" are required for public land (43 CFR 8342.1).

The majority of the comments in this category addressed OHVs and many of these were focused on the White Mountains NRA. Comments ranged from those wanting more and almost unlimited motorized access to those wanting less motorized access and/or more opportunity for non-motorized users. Commentors noted that trail and resource damage is occurring; that additional trails are needed; that more non-motorized trails are needed; that all existing motorized trails should remain open to motorized use; that boggy sections of trails need to be improved or rerouted; and that new trails should be built in a sustainable manner. Although some people want more trails, others noted that there are enough trails in the White Mountains and that the current primitive management should be maintained. One comment questioned the long-term value of trail "hardening" techniques, as it enables more riders to go further into the backcountry and invites them to make "new" trails.

Some recommended limits on summer use of OHVs to prevent damage to trails, soils, water, and vegetation. A few comments recommended that OHV use be limited to designated trails. For example: "Not only have the trails, soils and water been damaged by irresponsible riders, but off-road travel has created ever-widening sets of "new" trails, damaging the soils, streams, wetlands, vegetation and adversely impacting wildlife."

Although many of the comments were focused on the Steese and White Mountains, at least one person noted that the use of OHVs on general public lands not in conservation areas must also be addressed in order to establish strong legal authority for enforcement of regulations and restrictions and assure protection of the public resources. The State expressed concern that OHV designations be compatible with the State's generally allowed uses and the State's Long-Range Transportation Policy Plan.

Another issue of concern for some was the potential impacts on subsistence access or resources from increased or improved trail access. For example, ease of access has resulted in a flood of urban hunters and very short caribou hunting seasons along the Taylor Highway, making it more difficult for rural residents to have a successful hunt. Others noted that more motorized access would help disperse hunting pressure over a larger area, thereby reducing conflicts. If motorized trails are limited to winter access only, there is less resource damage, less trail damage, and fewer conflicts. Another comment noted that the Alaska Board of Game has designated non-motorized areas in several sections along the road system as a means of providing a variety of harvest opportunity in accessible areas. These few "walk-in" areas are great for people willing to work more than the average hunter for a high-quality experience or those without special motorized equipment (such as younger hunters). Non-motorized trails or seasonal restrictions on motorized use may be appropriate in these areas.

Commentors also recommended inventory and documentation of existing trails; additional law enforcement; more public education on trail etiquette and resource damage caused by OHVs; more signs; additional parking at trail heads; consideration of air quality and noise impacts from OHVs, and more public involvement in travel management decisions.

A few comments addressed travel by boat. One recommended that some restrictions be placed on the use of motor boats on Birch Creek National WR, such as engine size or distance upstream, or non-motorized weeks/weekends to enhance the river's wild qualities. Additionally it was noted that the brochure for Birch Creek make it sound like the river was a non-motorized river when it is not.

## **2.2.9. Issue 9: Recreation and Visitor Services**

*What range of recreational opportunities should be provided to meet the wide variety of public demand?*

Recreational uses, demands, and impacts are increasing. New technologies are making it easier for visitors to access areas that have not traditionally seen much use. Increasing populations are creating a greater demand for various and sometimes competing recreation uses. The BLM now has official guidance requiring the incorporation of a Benefits Based Management (BBM) approach into RMPs (BLM 2005b, H-1601-1, Appendix C). Program direction is also derived from the Bureau's Unified Strategy (IM No. 2007 – 043, 01/09/07), and the BLM's Priorities for Recreation and Visitor Services, Workplan Fiscal Years 2003-2007, May 2003 (IB No. 2004-072). Instruction Memorandum No. 2006-060 also outlines important recreation program strategy.

The BLM has adopted a strategy to move from an activity-based approach to one which focuses on recreation experiences and benefits (United States Department of the Interior, 2003, p.181). This strategy is based upon the BBM planning framework. Central to BBM are four levels of recreation demand: 1) desired activities, 2) desired settings, 3) desired experiences, and 4) benefits. The BLM contracted with the University of Alaska Fairbanks (UAF) to conduct user surveys in the White Mountains NRA and Steese NCA (Fix 2008). This study was designed to gather information on these four levels of demand. In Fix (2008) findings for each level of demand is presented and the levels of demand is integrated to provide a holistic picture of visitors to the planning area. This study was conducted as a sample of the general population, not just those who participated in the study, and thus the data will be interpreted as such.

Numerous comments relating to recreation were received during scoping. Some were very specific such as recommending dumpsters, new boat launches, handicapped access, additional cabins, or additional interpretive panels in certain areas. Others were more general in nature. Recreational mining was of interest in some areas. For example: the RMP "needs to address the issue of recreational mining by opening more of the area for recreational mining, whether using a gold pan, highbanker or small suction dredge. The Fortymile is a historical mining district and a great part of why people come to see this area."

Comments reflected the importance of the White Mountains NRA to the Fairbanks community. For example: "I think you all have done a great job with the White Mountains. It's probably one of the most visible things around Fairbanks that people participate in and I think everyone pretty much appreciates that"; "I have been a user of the White Mountains Recreation Area and so have many, many people I know. We in Fairbanks really value and appreciate that and I think the management has been pretty good on that"; "Clearly, the White Mountains is in Fairbanks back yard. We do think BLM has done an amazing job of balancing competing interests. I think the hard look does need to be taken for as we go out the next 50 years, how can we protect the area so that we have then what we have today as a value."

Generally, people seemed to be fairly happy with the current recreation management in the White Mountains NRA and Steese NCA, other than OHV management which is addressed under Travel Management. Comments indicated that BLM should keep trails and facilities in the White Mountains NRA and Steese NCA in the relatively primitive condition that currently exists. For example, "building more facilities in the backcountry in an attempt to boost visitation and revenues will degrade the wildland experience most people are seeking. The low density of cabins now spaced somewhat evenly across the White Mountains NRA (including some of the rivers) make for a nice experience in both the summer and winter. The level of signage and trail marking is generally adequate". Some comments recommended that existing primitive and semi primitive recreation zones within the Steese NCA and White Mountains NRA be maintained. Current designations were seen as a balance for outdoor enthusiasts with each area filling a different recreation niche. One organization recommended a focus on the 'undeveloped recreation-tourism market' and were supportive of Special Recreation Management Area designation. Although, another group recommended that BLM not use a Benefits-Based system as it does not accurately represent the opinions of all user groups and the type of management actions they would like to see.

## **2.2.10. Issue 10: Wilderness Characteristics**

*How will BLM manage to retain existing wilderness characteristics in the planning area?*

A few comments recommended that BLM identify wilderness characteristics in the planning area and develop management strategies to maintain existing wilderness characteristics. For example: "the Eastern Interior RMP must identify protections and means to preserve wilderness quality characteristics defined as naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation. ...wilderness qualities should be documented with goals for protection to prevent degradation that would preclude future designations."

The BLM's *Land Use Planning Handbook* (BLM 2005) requires the identification of decisions to protect or preserve wilderness characteristics, goals and objectives to protect the resource, management actions necessary to achieve those goals and objectives, and conditions of use on authorized activities that would avoid or minimize impacts to wilderness characteristics. The Eastern Interior RMPs will identify and describe wilderness characteristics within the planning area and develop the appropriate management for these areas as required in the *Land Use Planning Handbook* (BLM 2005). Wilderness characteristics include naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation. When describing wilderness characteristics, it must first be determined if an area is 5,000 acres in size, or contiguous to a wilderness study area, or an area administratively endorsed for wilderness by another agency. If the unit meets one of these criteria, then it must be determined if it possesses naturalness. If so, then it must also possess outstanding opportunities for solitude and/or outstanding opportunities for primitive recreation in order to be defined as possessing wilderness characteristics.

## 2.3. Planning Process Comments to be Addressed

Many concerns regarding the planning process, impact analysis, public involvement, and layout of the RMPs/EIS were raised during scoping. These comments will be addressed during the planning process and in the development of the Eastern Interior RMPs, but generally will not contribute to development of a range of alternatives. One of the more controversial process issues is discussed below. For a full list of the comments, see Appendix B.

### 2.3.1. Combining Plans

One of the most controversial process issues raised by several individuals and groups was the plan to combine four diverse planning subunits under one RMP. The strategy laid out in the *Preplan Analysis for the Eastern Interior RMP/EIS* (BLM 2007) was that the Eastern Interior RMP/EIS would evaluate and make land use decisions on each of four distinct subunits within the planning area: the Steese NCA; the White Mountains NRA; the Fortymile subunit; and the Upper Black River subunit. Two of the subunits, the Steese and White Mountains would have their own separate Records of Decision (RODs) due to their respective status as a national conservation unit and national recreation area. Decisions on the Fortymile and Black River subunits were to be combined into one ROD.

A few representative comments which sum up the issue are listed below.

- "We question the usefulness of trying to do a single "umbrella" plan for such a diverse set of lands. The BLM already has experience with the existing RMPs for White Mountains NRA, Steese NCA, and a MFP for the Fortymile. You therefore know the specifics of what works and what needs to be revised. We are concerned that combining these disparate areas into a single plan will result in such a general plan as to be without much value to

the land manager trying to make future decisions and would give short shift to the specific mandates establishing the units. We urge you to provide separate planning efforts for the White Mountains NRA and the Steese NCA";

- "...without separate, specific management plans for each conservation system unit, the subsequent planning document will likely become inordinately complex and confusing, and will diminish opportunity for the public to submit constructive comments on the draft plan".
- "The Black River area is really a different area from the standpoint of inventory, previous regulations, and planning process. It's really a frontier and I would suggest you may want to treat the Black River quite differently from the other areas, possibly even need to put it on a separate planning process with a different time frame because of the need for better inventory and background data collection".
- "Our organizations are concerned about the layout and readability of the draft and final documents".
- "The Eastern Interior RMP/EIS should be organized and written in such a manner as ensure clarity and participation. Our organizations recommend that four separate EISs (or one EIS separated into individual volumes for each area) should be printed and distributed, as well as four separate summaries. This will increase clarity and organization of materials, and aid in effective public involvement as well as prevent violation of agency mandates".
- "According to BLM's Land Use Planning Handbook H-1601-1... BLM must 'develop stand-alone RMP/EIS level for all national monuments, and congressionally designated national conservation areas and national recreation areas...'"
- "... a new RMP/EIS is not needed, only a revision to update the information and improve management directives. Originally, revision was the intent for the Eastern Interior RMP and we feel that the BLM may be allowing potentially vast and detrimental changes by conducting a new NEPA process".

In response to concerns raised during scoping and further internal review the BLM will amend the Eastern Interior PrepPlan to reflect that four separate RMPs will be developed as described in Section 1.1.2 Purpose and Need. Planning efforts will be combined under one planning process and one EIS. The Eastern Interior RMPs will consist of the revised Steese NCA RMP, White Mountains NRA RMP, Fortymile RMP; and the newly developed Upper Black River RMP. The Eastern Interior RMPs will provide a comprehensive framework for managing and allocating uses of the public lands and resources as required by the FLPMA. BLM will continue to manage public land and mineral estate in accordance with the current, unrevised RMPs and MFP until the Eastern Interior RMPs/EIS is completed and four Records of Decision (RODs) are signed.

These four RMPs will be developed in a concurrent planning effort and will be covered by a single EIS. The BLM will strive to make the documents as simple as possible, and prepare them in a format which allows the public to select either the entire document for review, or one or more specific subunits. A new NEPA analysis is required, for both RMP revisions and new RMPs. The end result of the planning effort will be a ROD and Approved RMP for each management unit.

The BLM has combined planning efforts in a similar manner in other states. The TriCounty RMPs in New Mexico, is combining an RMP revision and an RMP amendment under a single EIS. The BLM is revising the six western Oregon RMPs tiered to the Northwest Forest Plan. The revised plans will address public lands and resources managed by the Salem, Eugene, Roseburg, Medford, and Coos Bay Districts and the Klamath Falls Resource Area of the Lakeview District. Additionally, step-down plans will be developed for some programs, such as recreation, following completion of the RMPs. These step-down plans will provide more specific management direction than the RMPs.

## 2.4. Special Designations Including Nominations

### 2.4.1. Areas of Critical Environmental Concern and Research Natural Areas

Currently there are four Research Natural Areas (RNAs) in the planning area. Under current planning guidance (BLM 2005b), RNAs are considered to be a type of ACEC. The four designated RNAs in the planning area are: Big Windy Hot Springs, Limestone Jags, Mount Prindle, and Serpentine Slide. These are described in the EIRMPs Analysis of the Management Situation and in RNA reports (Juday 1988, Juday 1989, and Juday 1998).

#### 2.4.1.1. ACEC Nominations

One area was nominated for ACEC designation by the public during the scoping process. The Alaska Wilderness League and Chalkyitsik Village nominated the upper Black River for designation as an ACEC. One individual nominated the watershed of the Salmon Fork of the Black River as an ACEC. BLM has requested additional information from the nominators.

In their scoping comments, the Alaska Wilderness League outlined how they think the upper Black River area meets both the relevance and importance criteria under 43 CFR 1610.7 – 2(a). (1) Relevant: The area is a significant historic, cultural, and scenic value as well as a fish or wildlife resource. The area is a source of subsistence as well as a clean household (municipal) water resource for the village of Chalkyitsik. Historic Old Salmon Village is located along the banks of the Upper Black River. According to BLM's study the area is critical spawning and rearing habitat for anadromous and resident fish. (2) Important: The above values have substantial significance. The area is critically important locally but also has more than local significance and special worth. The area is an important vestige of Alaskan and Native culture. According to BLM the area has potential for recreational value. The remoteness of the area makes this of state or national significance. The Black River is a tributary to the internationally significant Yukon River and the spawning ground is an important contribution to the success of the Yukon's commercial, sport and subsistence fishery.

Chalkyitsik Village also recommended the upper Black River as an ACEC, noting that the area meets both the relevance and importance criteria. They noted that the area is relevant as a source of subsistence resources, municipal water, historic sites, and spawning habitat. The area has importance at the local level and internationally due to its contribution to the success of the Yukon River commercial, sport, and subsistence fishery.

A BLM report, the *Aquatic Resources of the Salmon Fork Black River, Alaska* (Collin et al. 2002), also recommended an ACEC in the Black River area. This document states: "Given the high quality and diversity of this ecosystem, the areas of critical spawning and rearing habitat for anadromous and resident fish populations, and the high potential for future recreational and subsistence use, we should consider giving parts or all of the area a special land designation, such as naming it an Area of Critical Environmental Concern...".

### **2.4.1.2. RNA Nominations**

Although there were no nominations for new RNAs, the Alaska Wilderness League recommended expanding the boundaries of three existing RNAs to ensure that the areas are of an adequate size to protect the integrity of the natural systems. In the development of the Steese and White Mountains RMPs in the 1980's, larger areas than ultimately designated were proposed for RNAs. The success of management related to the size of these areas should be reviewed to determine if the originally proposed larger area is necessary. The Alaska Wilderness League recommended the following RNA expansions discussed below:

Big Windy Hot Springs: This "RNA, in the Steese NCA, is a very small area, 160 acres, and is susceptible to disturbances outside of its boundaries. The 1984 Steese RMP recommended the acreage for the RNA be anywhere from 4,400 acres to 12,733 acres. (Juday, 1998) The Eastern Interior RMP should expand the acreage of the RNA to ensure that the values for which it was designated are not degraded. The surrounding area should remain semi-primitive to prevent proliferation of undesignated trails and damaging impacts to the surrounding vegetation".

Mount Prindle RNA: The RNA is "shared between the Steese NCA and the White Mountains NRA, and a considerably larger area (47,000 acres) was nominated and reviewed for inclusion in the National Natural Landmarks Program (NNLP), under the National Parks Service in the late 1970's. (Juday, 1988) This area still retains the values for which it was reviewed and the RNA boundary should be expanded to ensure proper protections for the values of the area".

Limestone Jags RNA: "The spine of the White Mountains, an area of 180,000 acres that includes the Limestone Jags RNA, was nominated for inclusion in the National Natural Landmarks Program. (WMNRA PRMP/FEIS, 1984) The current Limestone Jags RNA is 5,170 acres and features: caves, underground streams, natural bridges or arches, and emergent cold springs which are rare at such high latitudes. The area is important seasonal habitat for dall sheep and the White Mountains Caribou Herd and has scientific significance. (Juday, 1989)".

## **2.4.2. National Natural Landmarks Program**

There are currently no designated National Natural Landmarks in the planning area. However, Mount Prindle was reviewed for inclusion in this program in the 1980s.

### **2.4.2.1. National Natural Landmark Nominations**

The Alaska Wilderness League recommended that a new review be conducted to determine the potential inclusion of the Mount Prindle area into the National Natural Landmarks Program for the following reasons.

"The 2,800 acre Mount Prindle RNA was designated by BLM for its uncommon bird and vegetation populations as well as important habitat for Alaska's caribou and dall sheep. The area contains examples of both glaciated and un-glaciated alpine terrain and has high potential for education and scientific purposes. (Juday, 1988) Mount Prindle was reviewed in the 1980's for inclusion in the National Natural Landmarks Program, and was considered of local significance and a representative example of the geological and ecological features associated with the Yukon – Tanana Uplands (Young and Walters, 288-292)."

"Mount Prindle was determined under the Young and Walters review to be important and regularly used habitat for the Fortymile Caribou Herd. The area also contains an unusually extensive area of alpine tundra. The area was considered, in the 1980s, to potentially be in danger because of accessibility and mineral development. It's proximity to the Steese Highway and old mining roads that run along creeks that drain Mount Prindle make the area susceptible. Further, though the area is not considered to contain economically important mineralization, Young and Walters directly state that economics change and mineral activity could pose a serious threat to the area".

### **2.4.3. National Trails**

The Pinnell Mountain National Recreation Trail (NRT) is located within the Steese NCA. No additional trails were nominated during formal scoping for the Eastern Interior RMPs. However a one comment relating the Pinnell Mountain NRT were received. "I love the Pinnell Mountain trail and I was sobered to learn that it is right on the boundary of the Steese Recreation Area if not some of it on the outside. I encourage strong management to ensure that the values of that highly accessible and beautiful trail are maintained into the future. It may require either cooperative agreements or somewhat different management of that area that is between the trail and the road. Because it really is a popular place and so easy to get up into the high tundra country and that is kind of rare around here to get there that easily".

### **2.4.4. Wild and Scenic Rivers**

There are three existing designated rivers in the planning area: Fortymile National Wild and Scenic River (Fortymile NWSR), Beaver Creek National WR, and Birch Creek National WR. No nominations for additional river designations were received during scoping. At least one comment was opposed to the designation of any additional rivers. Numerous comments provided recommendations on management of the existing rivers.

There are existing river management plans for all three rivers which were approved in 1983. These river management plans will be reviewed during the planning process and a determination made: if they should be carried forward as valid existing management and incorporated into the Eastern Interior RMPs; if the Eastern Interior RMPs should be used to amend one or more of the river management plans; or if the Eastern Interior RMPs should contain management direction requiring future amendments to one or more river management plans.

Because these three rivers were designated through ANILCA, the outstandingly remarkable values (ORV) for each river have never been identified. These ORVs could either be identified through the Eastern Interior planning process or the determination of ORVs could be delayed to a river management plan. BLM will look at potential ORVs for these rivers during the planning process and make a determination on the most appropriate way to identify the ORVs for Fortymile NWSR, Beaver Creek National WR, and Birch Creek National WR.

The WSR Act requires BLM to assess river and stream segments as part of the planning process. Before a river corridor may be considered for designation as a Recreation, Scenic, or Wild River Area, the WSR Act requires a determination that the river and its immediate environments possess one or more specific, outstandingly, remarkable values. During the planning process, undesignated rivers on BLM-managed lands will be reviewed to determine if they meet the eligibility requirement. A suitability determination and management direction needs to be determined for eligible river segments identified during planning. If any eligible river segments

are identified, a suitability determination will be made in the record of decision. There are opportunities for interested parties and the public to be involved in this process, through the RMP development process.

## **2.5. Concerns or Issues Raised that are Outside the Scope of the RMPs**

During the public scoping period, several concerns or issues raised by the public were outside the scope of the planning effort or do not conform with current policy. Following is a brief discussion of these concerns or issues.

### **2.5.1. Full Metal Minerals**

One comment raised an issue regarding Full Metal Mineral's authorization to conduct exploration activities within the Fortymile Resource Area. This is outside the scope of the RMP and is being addressed administratively.

### **2.5.2. R.S. 2477 Rights-of-Way and ANCSA Section 17(b) Easements**

A few commentors raised the issue of managing R.S. 2477 routes to provide access to public lands. The issue of determining the validity of R.S. 2477 rights-of-way is outside the scope of the RMP. Land use planning does not affect valid R.S. 2477 rights or future assertions. In the absence of specific regulation or law, the validity of all R.S. 2477 rights-of-way is determined on a case-by-case basis through the federal courts.

The Eastern Interior RMPs will include language indicating that the validity of R.S. 2477 rights-of-way will be determined outside of the planning process.

A few comments were received regarding ANCSA section 17(b) easements. Section 17(b) of the ANCSA provided for the reservation of easements across lands being conveyed to Native regional and village corporations primarily to provide access to public lands and waters. Comments on easements noted that access to public land is becoming more important as recreation and subsistence use increases and BLM needs to make sure that necessary easements are established before land is conveyed. Easement identification and reservation is outside the scope of the RMP.

### **2.5.3. Wilderness Review**

A few comments brought up the issue of Wilderness study and designation. Comments ranged from recommending that Wilderness review be conducted during the planning process to recommendations that the RMPs not consider Wilderness review.

Currently the BLM is operating under the policy set forth in the Memorandum from Secretary of the Interior Gale A. Norton to the Director of the BLM, dated April 11, 2003, which states, in part: "As it is the Administration's policy to work closely with Federal, State and local government officials, DOI's policy on this matter should recognize and accommodate the perspectives being expressed by Alaska's State and Federal elected officials....Therefore, ...I instruct BLM to consider specific wilderness study proposals in Alaska, as part of any new or revised resource

management planning effort, if the proposals received have broad support among the State and Federal elected officials representing Alaska. Absent this broad support, wilderness should not be considered in these resource management plans.”

At this time, there is a clear lack of broad support for further wilderness proposals among Alaska’s state and Federal elected officials as noted in the Scoping comments BLM received from the State (Letter from the State of Alaska, Department of Natural Resources, August 6, 2008). Absent a revised policy from the Secretary of the Interior, Wilderness Study is outside the scope of the RMP.

#### **2.5.4. State Mining Claims on the Mosquito Fork**

One issue raised at a public meeting was the validity of state mining claims on the Mosquito Fork of the Fortymile NWSR and authorization of the claim holder to work these claims. This is outside the scope of the RMP and is being addressed administratively.

#### **2.5.5. Management of Taylor Highway Waysides**

Several comments noted a problem with litter and the need to improve interpretive messages at the waysides on the Taylor Highway. Although the Recreation Management Section of the RMPs may address management of waysides, interpretation, or the need for additional facilities, these particular problems are administrative and can be addressed before completion of the Fortymile RMP.

#### **2.5.6. Hunting Regulations**

Several comments were made regarding the length of hunting seasons, the influx of urban hunters into rural areas, and management of access on state lands during hunting season. These issues are outside the scope of the Eastern Interior RMPs. Hunting regulations, seasons, and bag limits are the responsibility of the Alaska Board of Game and the Federal Subsistence Board. Management of trails on State land are the responsibility of DNR. Planning decisions do not change either State or Federal hunting regulations. Management of trails on BLM managed-land will be covered under the Travel Management sections of the Eastern Interior RMPs.

#### **2.5.7. Predator Control and Intensive Management**

One letter raised the issues of predator control and the intensive management, recommending that the BLM should develop and consider alternatives that, as a minimum, close BLM-managed lands to "intensive management," including aerial predator control authorized under Alaska Statute 16.05.783.

These issues are outside the scope of the Eastern Interior RMPs. BLM’s policy on predator control, as described in Instruction Memorandum AK-2006-046 (September 27, 2006) is as follows. Unless control activities conflict with ongoing or anticipated BLM authorized actions, land use plan decisions for a given area, or a threat to the public safety exists from the performance of those activities, the BLM’s position on the State’s predator control program will be as follows: predator control is a State function and the BLM neither supports nor condemns predator control methods approved by the Board of Game.

BLM's policy regarding predator control and intensive management is further outlined in a letter from the Department of Interior (DOI), Office of the Secretary, Assistant Secretary of Fish, Wildlife, and Parks to Mr. Gerald Nicholia, Chair of the Eastern Interior Resource Advisory Council (December 19, 2006). As noted in this letter, each DOI land management agency has differing legal requirements and policy guidelines regarding intensive management, including predator control. BLM's mandates and authorities differ from those of the NPS and FWS. BLM manages its Alaska lands primarily under FLPMA and ANILCA. While the BLM manages land uses and habitat on its lands, management of fish and wildlife on BLM lands is conducted by the State of Alaska, consistent with the traditional role of the State in managing resident species of fish and wildlife. Essentially, predator control activities by the State of Alaska may take place on BLM lands, as long as they do not conflict with ongoing or anticipated BLM authorized actions.

Additionally, the BLM and Alaska Department of Fish and Game (ADF&G) have a Master Memorandum of Understanding (BLM 1983) where BLM agrees to: 1) recognize the right of the ADF&G to enter onto BLM lands at any time to conduct routine management activities which do not involve construction, disturbances to the land, or alterations of ecosystems; and 2) recognize ADF&G as the primary agency responsible for policy development and management direction related to uses of fish and wildlife resources on State and Bureau lands, pursuant to applicable State and Federal laws.

If a field manager determines that the State's predator control activities pose a threat to the public safety, or other management conflict, a response will be coordinated between the State of Alaska and the BLM Alaska State Office. Dealing with such issues is an administrative function and does not require a land use plan decision.

A second issue raised in this same letter was that the BLM has never evaluated the impact of the predator control implementation plans, other Board of Game predator control related regulations, and liberal bag limits for bears and wolves under NEPA. The BLM will evaluate the need to consider impacts from predator control activities in the cumulative impact analysis of the Eastern Interior RMPs/EIS.

### **2.5.8. BLM Employees Abusing Their Authority**

One group raised the issue of conflicts with individual BLM employees. As stated in the comment: "Several reports from members in our mining district have pointed to BLM employees as abusing their positions to make unreasonable and illegal requests of the miners. A tighter rein and clearer instructions in regards to the limitations of the individual officers' authority should be worked into the new management plan."

This is an administrative issue, not a planning issue.

### **2.5.9. Law Enforcement**

Some comments indicated that law enforcement efforts needed to be increased. "Since enforcement is key to curbing established patterns of irresponsible riding, the plan must provide for enforcement staff and equipment."

Law enforcement is a staffing and funding issue and will not be addressed in the RMPs.

## **2.5.10. Old Salmon Village**

A few comments referred to the Old Salmon Village, the historic village of Chalkyitsik, on the upper Black River and the need for BLM to protect and preserve this area, and to consult on it with Chalkyitsik Village.

Management of cultural resources on this site is outside the scope of the RMP because Old Salmon Village and nearby Salmon Village [Sec. 11, T20N, R23E, FM, & Sec. 9, T20N, R23E, FM, respectively] are located on within the Yukon Flats NWR on land managed by the FWS.

## **2.5.11. NEPA Process Issues related to the Doyon Exchange EIS**

### **2.5.11.1. Doyon Exchange EIS**

One organization raised issues related to the adequacy of the Doyon Exchange EIS and how that may be related to the Eastern Interior RMPs/EIS. Some of the comments were: "The potential ROW to the proposed land exchange and future oil and gas development in the Yukon Flats National Wildlife Refuge is inconsistent with the management of the White Mountains NRA and the Beaver Creek NWSR. Our organizations are opposed to the land trade, the oil and gas development and the ROW proposal. The NEPA process that the FWS has conducted is in violation of the NEPA and the Eastern Interior RMP may be in violation as well."; "Decisions for the Yukon Flats Land Exchange and the White Mountains Right of Way were made before the scoping of the Proposed Land Exchange Yukon Flats National Wildlife Refuge EIS ever began and long before the Eastern Interior scoping process began."

The future decision made by the FWS regarding the Doyon Exchange and the validity of their NEPA process is outside the scope of the Eastern Interior RMPs/EIS. Comments in opposition to the Doyon Exchange should be addressed to the FWS as they are the agency making the decision on the exchange. Under the White Mountains RMP (1986) there are provisions to allow ROWs in the primitive area. So a potential ROW is not necessarily precluded by the existing RMP. The Eastern Interior RMPs/EIS is not in violation of NEPA, given that the scoping period just ended in August 2008 and BLM has not even begun preparing the Draft EIS. Doyon has not applied for a ROW across BLM land. Lacking an application, the BLM has not evaluated the merits of such a ROW, and will only make a decision after an application is received and project specific EIS is completed.

### **2.5.11.2. Range of Alternatives**

One organization noted that the "alternatives that are formed for the Eastern Interior RMP may, like the FWS, be in violation of NEPA because the alternatives may not be formulated with their potential for adoption as required but instead for the agency to retrofit the process to meet the requirements of NEPA. As a result the BLM will have failed to meet the range of alternatives requirements because the methods used to derive the alternatives will not be adequate. When presenting and prioritizing the alternatives the agency must articulate why it has exercised its discretion in a particular way and provide an adequate explanation for its action. Mere conclusory statements are not enough". Additionally, the "BLM should put the [Doyon] ROW under 'alternatives considered but not analyzed in detail' with explanation that the ROW is inconsistent

with primitive and WSR management and would prejudice the process as decisions were made before the NEPA review, therefore eliminating the proposal from serious consideration."

The Eastern Interior RMPs/EIS will consider an appropriate range of alternatives. The perceived flaws from another agency's project-specific NEPA process do not automatically attach to the range of alternatives BLM will develop for the Eastern Interior RMPs. To contend that BLM will fail to develop adequate alternatives based on the FWS Draft EIS for the Doyon Exchange lacks merit. Transportation issues will be extremely important in the Eastern Interior RMPs. The above suggestion, if implemented, would inappropriately limit the range of alternatives necessary to adequately analyze the issue and make the informed decision NEPA requires. As stated earlier, BLM has not yet made any decisions regarding a ROW and is not the decision making agency on the Doyon Exchange.

### **2.5.11.3. Simultaneous EIS**

One organization made the following comments: "...for a meaningful EIS to be developed for WMNRA, the RMP/EIS must be completed before development and decisions are made by the USFWS"; "The USFWS and BLM should be completing environmental impact statements for the proposed development and potential ROW simultaneously instead of sequentially. Completing the NEPA process for the land exchange before impacts on the WMNRA are reviewed is illegal and violates NEPA."

These projects will undergo the NEPA process. There will ultimately be up to three EISs developed: the EIS for the Doyon Exchange currently being developed by the FWS; an EIS for the road/pipeline ROW (when and if an application is filed); and the EIS for the Eastern Interior RMPs being developed by the BLM. While the first two EISs will analyze the Doyon Exchange and the connected actions of road and pipeline ROWs, the third EIS will be revising the existing White Mountain RMP/EIS. The Eastern Interior RMPs/EIS do not have to be completed prior to or in conjunction with the Doyon Exchange EIS, or the project-specific EIS for the ROW. If a ROW application is filed before completion of the Eastern Interior RMPs/EIS, the existing White Mountains RMP/EIS will govern any BLM decision on the ROW. If the Eastern Interior RMPs/EIS are completed before the EIS for a ROW then the allocations in the revised White Mountains RMP would govern the BLM decisions. However, given that an EIS is being prepared for the Doyon Exchange, a potential ROW through the White Mountains NRA will likely be considered reasonably foreseeable and as such, will be considered in the cumulative impact analysis of the Eastern Interior RMPs/EIS.

### **2.5.11.4. Incompatibility with Beaver Creek National Wild River**

One group made the following comment. "This development [proposed land exchange and ROW] violates the management goals for the Beaver Creek National Wild River and the White Mountains National Recreation Area. The designated NWSR corridor will be managed as a VRM Class I area. The objective of this class is to preserve the existing character of the landscape so that it appears unaltered by man. The level of change to the landscape should be extremely low because only very limited management activities should occur (White Mountains NRA ROD, page 28). Primary emphasis shall be given to protecting its aesthetic, scenic, historic, archeological, and scientific features (Wild and Scenic Rivers Act section 10(a))."

Since a final route for the road/pipeline has not been determined, it is not known with certainty how close development will come to the Beaver Creek National WR corridor nor what the

impacts on the river would be. The visual resource management (VRM) decision referred to in the comment applies to the wild river corridor on BLM land, not to management of NWR lands. Under the current RMP for the White Mountains NRA (1986), there are provisions to allow ROWs in the primitive area, so the statement that the potential ROW violates the management goals for the White Mountains NRA is not entirely accurate. Additionally, there is no ROW application and the land exchange has not been approved so there is no development at this time. As discussed in section 2.5.11.3 above, if an application for a ROW is filed before the Eastern Interior RMPs are completed and approved, then the existing White Mountains RMP (1986) would govern BLM's decision on a ROW application.

## 2.6. Valid Existing Management

BLM-administered public land in the Planning Area is managed with direction from three documents: the White Mountains RMP (1986), the Steese NCA RMP (1986), and the Fortymile MFP (1982). Since these plans were implemented 22 to 26 years ago, numerous changes have occurred that require reconsideration of certain management decisions. Additionally, some lands in the planning area have never been covered by a land use plan.

In 2002, the BLM completed plan evaluations for the three existing plans. The evaluations showed that all three plans needed updating to include the new standards and changed policies. In addition, all three plans are deficient in addressing the BLM's planning guidance (BLM 2005b, H-1601-1, Appendix C). The evaluations also found that some of the decisions in the plans warranted further evaluation to determine if they were still valid. For example, land conveyance to the State and Native corporations has changed the land base managed by BLM within the Fortymile area, making some of the decisions in this document invalid.

Based on demonstrated experience, some elements of the existing plans work well and remain valid, and BLM intends to carry these management decisions forward. Determining which existing management decisions will be carried forward is a part of the planning process. BLM will review the existing condition of the environment, review the existing management situation, and identify which existing management decisions should be carried forward and where there is a need to modify existing management direction and/or develop new management guidance.

## 2.7. Anticipated Decisions

In accordance with FLPMA, BLM is responsible for management of public land and its resources based on the principles of multiple use and sustained yield. Management direction is provided by a land use plan or RMP. The RMPs are developed to determine decisions regarding appropriate multiple uses and allocation of resources, develop strategy to manage and protect resources, and establish systems to monitor and evaluate the status of resources and effectiveness of these management practices over time. Also, the management direction developed through the planning process needs to be adaptable to changing conditions and demands over the life of the RMP. Development of the RMPs will be in accordance with the guidance set forth in the BLM H-1601-1 – Land Use Planning Handbook (BLM 2005b).

The types of decisions made will follow the requirements of H-1601-1, Appendix C which outlines required planning level decisions for each resource and resource use. Some examples of the types of decisions to be made are listed below:

- How can the BLM accommodate potentially competing interests?

- What types of constraints should be placed on resource uses?
- What areas will be designated as open, closed, or limited to off-highway vehicle use?
- What are the desired resource conditions (e.g. vegetation, soils, water quality, etc.) in the planning area?
- Which lands should be available for mineral entry and leasing?
- Which lands should be available for disposal through sale or exchange?

# **Chapter 3. Draft Planning Criteria**

The draft planning criteria were published in the Notice of Intent on February 29, 2008 (Federal Register Vol. 73, No. 41) and are listed below.

1. Opportunities for public participation by interested groups and individuals will be encouraged throughout the RMP/EIS process.
2. Valid existing rights will be recognized and protected.
3. Subsistence uses will be considered and adverse impacts minimized in accordance with Section 810 of ANILCA.
4. BLM will work cooperatively with the State and Federal agencies, Native corporations, Tribes, and Municipal governments. Agencies (including federally recognized tribal governments) with jurisdiction by law or special expertise will be consulted to determine if cooperating agency status is appropriate and desired.
5. Wildlife habitat management will be consistent with Alaska Department of Fish and Game (ADF&G) objectives and/or the Federal Subsistence Board requirements and mandates.
6. Resource management plans prepared by BLM will conform to the Bureau's H-1601-1 Land Use Planning Handbook, Appendix C, Program-Specific and Resource-Specific Decision Guidance and supplemental program guidance manual for ACECs and Fluid Minerals.
7. The plan will be consistent with the standards and guidance set forth in FLPMA, NEPA, CEQ, NHPA, the Wild and Scenic Rivers Act, the Migratory Bird Treaty Act, ANILCA, and other Federal laws, regulations, and policies as required.
8. The plan will be consistent with the Alaska Land Health Standards.
9. Designations for Off-Highway Vehicles for all public lands within the planning area will be completed according to the regulations found in 43 CFR 8342.
10. Areas of proposed ACEC designation will meet the criteria found in 43 CFR 1610.7-2.
11. The plan will address all of the lands within the Eastern Interior planning area which are managed by BLM.
12. Review and classification of waterways as eligible for inclusion in the National Wild and Scenic River System will follow the guidance found in BLM's 8351 Manual.
13. The Economic Profile System (EPS) developed for BLM by the Sonoran Institute, or equivalent, will be used to characterize baseline social and economic conditions.
14. BLM will incorporate Environmental Justice (EJ) considerations in land use planning alternatives to adequately respond to EJ issues facing minority populations, low income communities, and Tribes living near public lands and using public land resources.
15. The analysis will employ guidance provided in H-1601-1, Appendix D, Social Science Considerations in Land Use Planning Decisions.
16. Wilderness designation will not be considered in this plan unless the Governor or the Congressional Delegation for Alaska recommends a particular area for study.

The BLM did not receive any comments that specifically recommended changes to draft planning criteria or that asked for new criteria. However, a few comments relating to draft planning criteria were received.

Criteria #16 Wilderness designation: The comments pertaining to this criteria suggested that the Eastern Interior RMPs: 1) document important wilderness qualities on a regional, state, national and global scale, and 2) offer the strongest protections possible for identified wilderness quality areas. The rationale offered was that although current policy prescribes that no wilderness designations can be made, policies change. The BLM policy for consideration of wilderness in Alaska has changed with changes in the administrations in the past. In light of this, wilderness qualities should be documented in the RMPs with goals for protection to prevent degradation that would preclude future designations.

Criteria #4 and #5: The State requested that the plan and planning process explicitly recognize the State's authorities that overlay BLM's land management responsibilities.

The State also requested that BLM management intent for selected parcels be as consistent as possible with state management intent. This could potentially be developed into an additional planning criteria.

# **Chapter 4. Data Summary and Data Gaps**

## 4.1. Introduction

At the onset of the planning effort, management direction was to use the best available data and limit collection of new data deemed necessary for the effort. The *Preplan Analysis for the Eastern Interior RMP/EIS*, approved September 2007, identifies these data needs. Since October 1, 2007 the planning team has worked to refine data needs and developed necessary GIS data themes required for this planning effort. Some new data has been collected in the Upper Black River subunit. This process is ongoing.

## 4.2. Data Gaps and Relevant Data Provided or Identified During Scoping

Comments received through public scoping identified a need to collect or obtain new data or information on the Upper Black River subunit, updated subsistence use data, and data for Yukon, Canada. The Eastern Interior FO has been collecting additional data on the Upper Black River subunit since the summer of 2007, regarding rare plant inventory, salmon habitat, and visual resources inventory. Additional field work is planned for 2009. The BLM has contacted the ADF&G, Subsistence Division and has obtained available subsistence data for the planning area. The BLM has also contacted the Yukon Government and has obtained GIS data for the Yukon.

Other comments noted that the GIS coverage for the Porcupine Caribou Herd winter range displayed on maps at the public meetings excluded an area of winter range. The BLM has obtained caribou distribution data from both ADF&G and the Yukon government. BLM will review this data and consult with ADF&G and other parties to determine which is the best data to use.

Other comments identified the need to obtain data on mineral potential and occurrence in the planning area. The BLM is currently reviewing available data and preparing mineral occurrence and development potential reports for both locatable and leasable minerals.

The DNR, a participating agency, brought to the BLM's attention the availability of numerous sources of data available from the State which may be useful for the planning process. The DNR supports a staff member who coordinates input from many state departments and divisions (as outline in section 1.4 of this report) and assists the BLM in obtaining data from these various departments and divisions. Data and important information is being exchanged between the state agencies and BLM.

With these ongoing efforts, sufficient information and spatial data is available to address issues and conduct analysis for this planning effort.

**Table 4.1. Relevant Data Identified as Available During Scoping**

<b>Data</b>	<b>Potential Sources</b>
Fairbanks Non-Subsistence Use Area	Alaska Department of Fish and Game (ADF&G), Subsistence Division
Subsistence use areas	Council of Athabascan Tribal Governments ADF&G Subsistence Division
Mineral potential, mineral exploration	Alaska Division of Geological and Geophysical Surveys (DGGGS)
	Alaska Division of Oil and Gas, Oil and Gas Exploration Licensing
	U.S. Department of Interior, U.S. Geological Survey
	Alaska Division of Mining
	Doyon, Limited. Doyon Land and Natural Resources
Porcupine Caribou Herd distribution	ADF&G, Wildlife Division
	Yukon Government
Land uses in Canada	Yukon Government
Uses of State Land	Alaska DNR, Area Plans
Climate Change	Intergovernmental Panel on Climate Change, <i>Climate Change and Water</i> , IPCC Technical Paper VI (IPCC, 2008)
	<i>Indigenous and Traditional Peoples and Climate Change Issues Paper</i> (Macchi, 2008)
Fish and Wildlife	<i>Our Wealth Maintained: A Strategy for Conserving Alaska's Diverse Wildlife and Fish Resources</i> (ADF&G's Comprehensive Wildlife Conservation Strategy)
	Alaska Habitat Management Guide Series (ADF&G)
	Alaska's Wildlife and Habitat, ADF&G (1973 and 1978)
	Anadromous Waters Catalog (ADF&G)
Travel Management and Access	U.S. Forest Service, <i>Managing Degraded Off-Highway Vehicle Trails in Wet, Unstable and Sensitive Environments</i> (Kevin G. Meyer)
	Alaska DNR, proposed access corridors and historic transportation routes
	Alaska Department of Transportation, <i>Let's Get Moving 2030: Alaska's Statewide Long-Range Transportation Policy Plan</i>
	Alaska Department of Transportation, <i>Interior Alaska Transportation Plan</i>
	Alaska State Parks, <i>Alaska Recreation Trails Plan</i> (2000)
	ADF&G, vehicular use restrictions for the harvest of fish and game
Recreation	Denali National Park and Preserve Backcountry Management Plan (2006)
	DNR, Alaska Heritage Trails Program
Socio-cultural	Alaska Department of Community and Economic Development, Community Information database
Economics	Alaska Department of Commerce, Division of Community and Regional Affairs, Alaska Economic Information System

# **Chapter 5. Summary of Future Steps in the Planning Process**

It is anticipated that the Eastern Interior Draft RMPs/EIS will be published and made available for public comment by September 2009. An Notice of Availability (NOA) will be published in the Federal Register announcing the public comment period. In addition, press releases will announce the availability of the draft RMPs/EIS. Public meetings to review and comment on the draft RMPs/EIS will be held approximately 30 days after the start of the public comment period. Meeting dates and locations will be publicized in local media.

If the draft RMPs/EIS are published as anticipated, the Proposed Plan/Final EIS should be published about August 2010. Delay in release of the draft will result in delay in the release of the final. An NOA will be published in the Federal Register announcing the 30 day protest period with press releases submitted to local media. Signing of the Record of Decision for the Eastern RMPs is expected to follow in late 2010 or early 2011, depending on resolution of protests.

Further information regarding the status of the Eastern Interior FO planning effort and opportunities for public participation may be obtained through the following contacts:

Bureau of Land Management Attention: Jeanie Cole, RMP Project Manager, 1150 University Drive, Fairbanks, AK, 99709 Telephone: (907) 474-2340

Project website: [http://www.blm.gov/ak/st/en/prog/planning/east\\_int\\_rmp.html](http://www.blm.gov/ak/st/en/prog/planning/east_int_rmp.html)

# Appendix A. White Mountains RMP Amendment Scoping Report

The BLM started the plan amendment process for the White Mountains NRA in March 2005 to deal with the issue of summer OHV use in the semi-primitive motorized unit. Because the scope of the amendment was limited, comments received were focused primarily on this issue. The BLM received comments on this issue as well as others which were outside of the identified scope of the amendment. After the formal scoping period and preparation of the scoping report (BLM 2005), a decision was made to stop the amendment process. Later a decision was made to revise the White Mountains RMP in conjunction with the revision of the Steese RMP and Fortymile MFP. The *White Mountains National Recreation Area Resource Management Plan Amendment Scoping Report* (BLM 2005a) is summarized below and incorporated by reference. The entire report is available on the Eastern Interior Web Page at [www.blm.gov/ak/](http://www.blm.gov/ak/).

Only one RMP-level issue within the scope of the amendment was identified during scoping: *How should we manage summer OHV use in the semi-primitive motorized unit to provide for public use and enjoyment of the National Recreation Area, to provide for compliance with applicable laws and regulations, and to provide for protection of natural resources?*

The following concerns or issues were raised but were either outside the scope of the amendment or could be addressed through implementation-level planning.

- Law enforcement: This is a staffing and funding decision, and not an RMP decision.
- User Fees for OHVs: the authority to charge such fees has not been delegated to this decision level.
- Gold panning and suction dredging in the Nome Creek valley: Public interest in this issue is minimal and existing management is adequately and effectively addressing current activity levels.
- Winter use by snowmachines: Public interest in changing the existing RMP guidance for winter use is minimal and existing management is adequate and effective.
- Activity-level planning, site planning, and design decisions, including design details, trail layout, cabin locations and site criteria: These types of decisions are better dealt with case-by-case during RMP implementation rather than in the RMP itself.

The following draft planning criteria were identified during the plan amendment process:

1. Compliance with applicable laws and regulations.
2. Protection of water quality in Beaver Creek, a component of the National Wild and Scenic Rivers System.
3. Eventual development of a sustainable OHV trail system, where adverse impacts from use both on and off trails are mitigated or decreased. .
4. No change from the OHV designations ("limited" or "closed") in the existing RMP.
5. No Change in the basic "zoning" of the Primitive Unit and the Semi-Primitive Motorized Unit travel management areas.
6. Summer OHV will be allowed where appropriate within the Semi-Primitive Motorized Unit

7. The RMP amendment will provide for changes in management in response to new technology, experience with trail management and OHV enforcement, unanticipated resource or social impacts, changes in funding and staffing, and eventual development of sustainable trails. It will not rely on thresholds and emergency closures to limit damage from OHVs.

# Appendix B. Scoping Comments

## B.1. Soil, Water, Air, and Climate Change Comments

<b>Climate Change</b>
<p>The larger issue of climate change should be addressed throughout the RMP/EIS and in the cumulative impacts analysis. While we are not certain what the precise impacts of climate change will be on Yukon River salmon, it is clear that warming waters and changing ecosystems is and will have a profound impact on Yukon River salmon. These impacts, as well as the uncertainty, should be considered and support a precautionary approach to management actions.</p>
<p>Climate Change is one of the greatest threats facing national landscape conservation lands and Alaska's rural communities. The BLM should make this issue a priority, by incorporating it into all planning and management strategies. The following points of discussion should be incorporated into the Eastern Interior RMP: Provide training on climate change and variability for all resource managers; Consider climate change and variability as a component of long-range management plans and strategies, as well as prioritizing adaptive management; Implement monitoring and assessment programs for impacts to wildlife and wildlife habitats expected to be most sensitive to climate change; Educate the public about climate change and its effects on Alaska public lands and resources; Establish and maintain migration corridors that allow species movement and vegetation shifts among islands of suitable habitat; Increase buffer zones around identified critical habitat in order to increase options for species under various climate change scenarios; Protect riparian and wetland communities to promote resilience of these important and susceptible habitats; Make the reduction and elimination of human-induced synergistic impacts a top priority for land and resource management; and Educate the public on the respiratory health consequences of increased fires and monitor and mitigate impacts to human health.</p>
<p>The BLM should fully integrate these discussion points (listed above) in the goals and objectives listed for the Eastern Interior RMP, not as a separate section on climate change. We request that BLM disclose the assumptions that are made about climate change impacts during the planning process and the ways in which it will be factored into the RMP.</p>
<p>Addressing impacts to key resources is critical, as is considering ecosystem and community implications. The BLM needs to coordinate research, management, and planning with adjacent lands to insure that the goals of habitat connectivity and resilience are achieved. The Eastern Interior Planning Area lands are an important component of a greater conservation system, and planning needs to consider the role of these lands beyond their borders now and in the face of climate change.</p>
<p>We refer the BLM to consider and incorporate strategies from the Preliminary Review of Adaptation Options for Climate-Sensitive Ecosystems (CCSP, 2008) for discussion and methods that can and should be incorporated into the management plan in order to promote ecosystem resiliency. Further recommendations include: Climate Change and Water IPCC Technical Paper VI (IPCC, 2008); Indigenous and Traditional Peoples and Climate Change Issues Paper (Macchi, 2008)</p>

<p>A significant number of watershed headwaters and Wild and Scenic Rivers are within the Eastern Interior planning area. These waters are important resources for drinking, subsistence and travel. In light of this, the BLM should incorporate funding and plan for additional research on the impacts of climate change on water resources.</p>
<p>With the growing knowledge and concern for climate change impact, we recommend that the BLM continue (or resume if it has been suspended) on-site water level and inflow monitoring and that these data are analyzed to look for patterns that may suggest alteration in hydrologic regimes. These studies are important for understanding and estimating climate change impacts so that the best decisions for the resource can be made.</p>
<p>Management implications of these landscape-level changes should be considered in the BLM management plan, particularly in the commitment of water resources and the short and long term health of aquatic systems.</p>
<p>The melting of permafrost is known to cause significant changes in the landscape, from thermokarsts across the landscape slumping into rivers to the expansion and loss of water bodies. Clearly, significant changes in the distribution would alter the landscape of the Eastern Interior Planning Area, and if these changes continue at current rates or with greater frequency, the results could be detrimental to many landscape and wildlife resources. Understanding how much of the Eastern Interior Planning Area landscape is underlain by permafrost is critical, and we encourage the management plan to include plans for better understanding permafrost and soils and to seek funding for such surveys, and ultimately, to incorporate this information into land management planning.</p>
<p>Other BLM and federal land management plans in Alaska have failed to address climate change in a quantitative and comprehensive manner, using the unfounded argument that there is too much uncertainty about climate change. Uncertainty is prevalent in all actions and impacts that the BLM considers when planning, and cannot be used as an excuse for failing to develop a range of possible impacts and assessing what the biological and value-based thresholds are for the affected resources, ecosystem and human communities. The CEQ states that “Cumulative effects analysis necessarily involves assumptions and uncertainties, but useful information can be put on the decision making table now. Decisions must be supported by the best analysis based on the best data we have or are able to collect. Important research and monitoring programs can be identified that will improve analyses in the future, but their absence should not be used as a reason for not analyzing cumulative effects to the extent possible now” (p. 3, CEQ 1997).</p>
<p>We urge BLM to incorporate the best available science, using the best available methods, in addressing climate change impacts on the ecosystems and inhabitants of the Eastern Interior Planning Area, as required by law. If there is not sufficient expertise within BLM to achieve this, we encourage BLM to seek outside assistance in order to prepare a reasonable, comprehensive assessment of climate change that will serve the purpose of conservation and sustainable management of the resources entrusted to BLM in this area.</p>
<p>Global warming should be at the top of BLM’s management chart. Global warming, what is going to change? Do you have a way of even measuring what might change? That may be an important part of your management in the years to come.</p>
<p>There is really not a comprehensive look at climate change impacts and as we know that relates to vegetation, habitat concerns, and even impacts as we have seen all across the State on local communities. So I would like the BLM to take a closer look at climate change impacts and a more comprehensive approach to an analysis.</p>
<p>The EIS should consider how resources affected by climate change could potentially influence the RMP and vice versa, especially within sensitive areas.</p>

<p>We [EPA] acknowledge that the interaction between land use and climate change is complex and not fully understood at this time. However, we recommend the BLM recognize the need for land management strategies that anticipate and monitor for changes in land cover potentially due to climate change, and that consider potential changes to climate due to land use decisions and resource development. Opportunities to document baseline environmental conditions and monitor for climate change indicators such as glacier cover, wildlife migration patterns and permafrost depths may exist on BLM-managed areas within the planning area. The BLM may also have opportunities to collaborate and coordinate with other agencies and with educational institutions to conduct research and monitoring of climate change on BLM-managed land within the planning area. We recommend the BLM incorporate available information into the RMP/EIS, and strive to address potential environmental impacts relative to climate change in future monitoring and land use decisions.</p>
<p><b>Water Quality and Water Resources</b></p>
<p>With respect to the Steese Conservation area and Birch Creek, you need to continue monitoring the water quality and restoring the condition of that wild and scenic river.</p>
<p>Suggested goal for the Yukon River: Listen and learn about the concerns for the watershed to identify point and non-point source pollution sites along the river and prioritize these locations for clean-up and remediation.</p>
<p>The Department of Environmental Conservation is responsible for ensuring the quality of State water resources consistent with 18 AAC 70.015, Alaska Water Quality Standards Anti-degradation policy. We request that BLM assist the State in this effort. We suggest the following measures to reduce nonpoint source pollution in the planning area: Nonpoint Source Water Pollution Prevention Measures: • Protect areas that provide important water quality benefits and/or are particularly susceptible to erosion and sediment loss. • Preserve areas that provide important water quality benefits and/or are necessary to maintain riparian vegetation and aquatic biota. • Site development projects, including roads, trails, and bridges/culverts, should be designed to protect the natural integrity of waterbodies, riparian vegetation, and natural drainage systems. • Limit increases of impervious areas, except where necessary. • Limit disturbance activities such as clearing and grading, and cut and fill to reduce erosion and sediment loss. • Limit disturbance of natural drainage features and vegetation. • Provide waste management facilities for human and solid wastes at high use areas.</p>
<p>Stormwater runoff from lands modified by human activities can harm surface water and, in turn, cause or contribute to exceedances of water quality standards by changing natural hydrologic patterns, accelerating natural stream flows, increasing peak stream flows, destroying aquatic habitat, and elevating pollutant concentrations and loadings. Runoff may contain high levels of contaminants, such as sediment, suspended solids, nutrients (phosphorus and nitrogen), heavy metals, pathogens, toxins, oxygen-demanding substances (organic material), and floatables. After a rain, stormwater runoff carries these pollutants into nearby streams, rivers, lakes, estuaries, wetlands, and oceans. Individually and combined, these pollutants impair water quality, threatening designated beneficial uses and causing habitat alteration and destruction. The State suggests the following measures to address stormwater runoff associated with lands modified by permitted activities: • Minimize Clearing and Grading • Protect Waterways • Phase Construction to Limit Soil Exposure • Immediately Stabilize Exposed Soils • Protect Steep Slopes and Cuts • Install Perimeter Controls to Filter Sediments • Employ Advanced Sediment Settling Controls • Certify and Train Contractors on Stormwater Site Plan Implementation • Control Waste at the Construction Site • Inspect and Maintain Best Management Practices</p>
<p>I have a big concern for the watershed areas, that these areas be protected and the potential impacts to them really be examined.</p>

<p>The EIS should disclose which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those waterbodies potentially affected by the RMP that are listed on the State's most current EPA-approved 303(d) lists. The EIS document should describe existing restoration and enhancement efforts for those waters, how the RMP will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality within impaired waters.</p>
<p>Antidegradation provisions of the Clean Water Act (CWA) apply to those waterbodies where water quality standards are currently being met. This provision prohibits degrading the water quality unless an analysis shows that important economic and social development necessitates some degradation of water quality. The EIS should determine how the antidegradation provisions would be met.</p>
<p>The EIS should: Identify all source water protection areas within the project area; Identify all activities and potential contaminants caused by those activities that could potentially affect source water areas; and Identify all measures that would be taken to protect the source water protection areas in the revised RMP/EIS.</p>
<p>The EIS should include data about existing road networks and evaluate the change in road miles and density that will occur as a result of RMP activities and predicted impacts to water quality by roads. The EIS should note that, under the CWA, any construction project disturbing a land area of one or more acres requires coverage under the National Pollutant Discharge Elimination System Construction Stormwater General Permit for discharges to waters of the U.S. The EIS should document the RMP's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality.</p>
<p>The RMP projects that would involve construction of facilities and access roads may also compact the soil, thus changing hydrology, runoff characteristics, and affecting flows and delivery of pollutants to water bodies and ecological function of the area. The EIS should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions within the planning area. The document should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to groundwater and surface water resources. For groundwater, the potentially affected groundwater basin(s) should be identified and any potential for impacts to springs or other open water bodies and biologic resources should be analyzed.</p>
<p>Our people have been hunting and living on this land for, I don't even know a figure to throw out there but a long time and a lot longer than any of us have ever been around here and now we have to fight for our land. We have to fight to keep you out of the headwaters of the Black River or it's going to run brown as that brown square that they've selected on there and I know that mining development does that. They need the water to get at the minerals and they need to discard it somewhere. So where does it get discarded? It gets discarded into the Black River because they say it's not contaminated. That's not the point though. The point is that the river is still not going to be clear anymore.</p>
<p>The Black River is the main water source for the village of Chalkyitsik. Though it's black when you look at it, the water comes out crystal clear and that's the water that everyone here in the community uses for drinking water and for everything else so one of the recommendations is keep that in consideration and offer it the highest possible protection because it is the only real water source here.</p>

<p>In general, water on BLM lands is subject to the State's "Water Use Act" (AS 46.15). The DNR shall determine and adjudicate rights in the water of the state, and its appropriation and distribution. The State of Alaska functions within the prior appropriation doctrine which allows the first appropriator of water a priority right to use water over subsequent appropriators on a "first in time, first in right" basis. A priority date is established at the time of application. On some BLM lands, the State may recognize a Federal Reserve Water Right (FRWR), but only on those BLM lands where Congress or the President withdraws lands from the public domain for a specific purpose(s), e.g. Wild and Scenic Rivers. All other BLM lands are considered part of the public domain and are not subject to FRWR. Unless otherwise specified by Congress, FRWR covers only the minimum amount of water necessary to fulfill the primary purpose of the land withdrawal. FRWR are implied until proven. Upon adjudication by the State, the priority date of a FRWR is the date the federal land was withdrawn from the public domain, and is then incorporated into the state water right system.</p>
<p>The RMP/EIS should describe all waters of the U.S. that could be affected by the project alternatives, and include maps that clearly identify all waters within the planning area. The document should include data on acreages and channel lengths, habitat types, values, and functions of these waters.</p>
<p>Projects affecting waters of the U.S. would need to comply with CWA Section 404 requirements. The U.S. Army Corps of Engineers issues Section 404 permits. If anticipated projects under the RMP/EIS would involve discharge of dredged or fill material into waters of the U.S., the RMP/EIS should include information regarding alternatives to avoid the discharges or how potential impacts caused by the discharges would be minimized and mitigated. This discussion would include the following elements: acreage and habitat type of waters of the U.S. that would be created or restored; water sources to maintain the mitigation area; re-vegetation plans, including the numbers and age of each species to be planted, as well as special techniques that may be necessary for planting; maintenance and monitoring plans, including performance standards to determine mitigation success; size and location of mitigation zones; parties that would be ultimately responsible for the plan's success; and contingency plans that would be enacted if the original plan fails.</p>
<p>Suggested goal for the Yukon River: Ensure that the existing sustainable economies of recreation, sport and commercial fishing, subsistence, and hunting are all prioritized for the lands managed under BLM.</p>
<p><b>Soils</b></p>
<p>The State suggests the following measures for Management Measures for Erosion and Sediment Control:</p> <ul style="list-style-type: none"><li>• Retain and protect natural vegetation particularly at the top and bottom of a slope along the contour, to slow runoff velocity, filter sediment, and reduce the volume of runoff on slopes.</li><li>• Reduce soil erosion and to the extent practicable, retain sediment onsite during and after construction.</li><li>• During development the smallest practical area should be exposed at any one time. When bare soil is exposed during development, the exposure should be kept to the shortest practical period of time.</li><li>• Prior to land disturbance, prepare and implement an approved erosion and sediment control plan or similar administrative document that contains erosion and sediment control provisions.</li><li>• During active mining reduce erosion and runoff from disturbed upland areas by replacing groundcover as soon as practical in the development.</li><li>• Sediments and other pollutants, including but not limited to oil, grease, nutrients, bacteria, and heavy metals generated by development activity, should be removed from runoff waters by appropriate water quality control measures before discharge into streams or lakes. Examples of control measures include sediment basins, silt traps, debris basins, oil/water separators, vegetated swales, and infiltration devices. The development plan should be fitted to the topography and soil conditions so as to create the least erosion potential.</li><li>• Provisions should be made</li></ul>

to effectively accommodate the increased runoff and pollutant loads caused by changed soil and surface conditions during and after development. Such provisions should include both stormwater and water quality control measures.

#### **Air Quality**

EPA notes that OHV and snowmachine use is increasing, and their 2-stroke engines mix the lubricating oil with the fuel and both are expelled as part of the exhaust, and allow up to one third of the fuel delivered to the engine to be passed through the engine and into the environment virtually un-burned. As stated in the U.S. DOI document, Air Quality Concerns Related to Snowmobile Usage in National Parks, Feb. 2000, hydrocarbon emission rates from 2-stroke snowmachine engines are about 80 times greater than those found in a 1995-96 automobile engines. A majority of these hydrocarbons are aromatic hydrocarbons, including polyaromatic hydrocarbons, which are considered to be the most toxic component of petroleum products, and aromatic hydrocarbons are also associated with chronic and carcinogenic effects. Increased air pollutant emissions could be problematic during short periods of poor air dispersion (e.g., river valleys where frequent inversion conditions may trap air pollutants). The NPS Final EIS for Winter Use in Yellowstone and Grand Teton National Parks contains a good summary of the science regarding impacts from snowmachine use. EPA recommends that BLM consider the results of these studies and factor the results into the RMP/EIS. The EPA encourages use of the newer less polluting 4-stroke engine snowmobiles.

## **B.2. Fish and Wildlife Comments**

### **Fish**

Regarding the Salmon Fork of the Black River, that area is an important salmon spawning area and people from Chalkyitsik catch fish on their way up to that area. It is important to realize as well that the salmon that spawn there go all the way to the Bering Sea and the north Pacific Ocean so those spawning areas are part of the support for a broader interest in salmon resources that go beyond the local use. There is an International Agreement with Canada regarding Yukon River Salmon and that should be acknowledged and dealt with appropriately in the plan.

BLM must analyze the impacts to Chinook, summer and fall chum, coho, sockeye and pink salmon in the Yukon River and its tributaries. Analysis should include impacts from increased mineral development including but not limited to: leaching, direct exposure to chemicals at various stages of the salmon life-cycle, and impacts to habitat from mineral development itself and the associated roads. Direct and indirect impacts to salmon should be analyzed for each management alternative, including changes to (d)(1) withdrawal status.

Impacts to [Yukon River] salmon stocks should be analyzed in light of the extremely fragile state of this salmon run, and its extreme importance to subsistence and commercial users. The RMP should embrace a precautionary approach, limiting additional mineral and other development unless it can be shown that there will be absolutely no detrimental impacts to salmon populations.

To ensure that impacts on salmon stocks are adequately analyzed, both the U.S. FWS and the ADF&G should be consulted on this EIS because of their expertise in and shared management responsibility for Yukon River salmon populations.

Commercial salmon harvests provide one of the only sources of income in many Yukon River villages. On the Yukon River, commercial salmon harvests have declined in recent years. In 2008, no directed commercial fishery was allowed for Chinook salmon. The 2007 commercial harvest of 33,629 Chinook was 30% below the recent 10-year average. The recent 10 year average includes several years when Chinook returns were declared disasters by state and federal agencies, and necessitating many millions of dollars of aid. As with subsistence fisheries, impacts to commercial salmon fisheries should be looked at on a riverwide basis, as any impacts to the salmon in the Eastern Interior region will be felt throughout the watershed. Impacts to commercial fisheries should be analyzed not on the basis of economic value alone, but on the role of these fisheries as sources of employment in the affected communities.

Under the terms of the [Yukon River Salmon Act Treaty] YRSA, which was ratified in 2002, the U.S. is bound to pass a set number of Chinook and fall chum salmon across the Canadian border to provide for Canadian harvests and escapement needs. Chinook salmon escapement requirements have not been met for two years in a row. In addition to specific escapement requirements, the YRSA also mandates habitat protection: E.g. In light of the benefits they receive from the salmon originating in their portions of the Yukon River, the Parties agree that: salmon should be afforded unobstructed access to and from, and use of, existing migration, spawning and rearing habitats; respective water quality standards should be maintained and enforced; productive capacity of the salmon habitat on both sides of the Alaska-Yukon border should be maintained in order to achieve the objectives of this Chapter; and should access be obstructed, water quality standards be degraded or productive capacity of the salmon habitat be diminished to a degree that affects the objectives established in this chapter, the Yukon River Panel may recommend corrective actions which may include adjustments to fishing patterns, border escapement objectives and guideline harvest ranges.

Management measures adopted in the RMP must be compliant with the U.S. escapement and habitat obligations under the YRSA.

NEPA requires the analysis of cumulative impacts in addition to direct and indirect impacts. There are many past, present and future actions which have impacts on Yukon River salmon. BLM should consider in particular the impacts from salmon bycatch in the Bering Sea pollock fleet. Chinook salmon bycatch increased steadily from 2004 to 2007, while chum salmon rose dramatically from 2002 to 2005. Chinook salmon bycatch rose from 34,495 fish in 2002 to more than 121,909 fish in 2007, a number which is almost triple the 10-year average. Chinook salmon bycatch levels have decreased substantially to date in 2008, but the 2007 Chinook salmon bycatch number was the highest on record. Chum salmon bycatch rates increased similarly from 80,652 fish in 2002 to a record high of 705,963 fish in 2005, with a decrease to 310,545 fish in 2006 and 94,072 fish in 2007. The chum bycatch numbers were also higher than historic levels: the 2005 number was more than twice the 10-year average chum salmon bycatch. Prior to 2004, the highest chum salmon bycatch on record was 243,246 fish in 1993. The record high in 2005 almost tripled that previous record.

According to scale pattern analysis of bycatch samples from 1997 to 1999 approximately 25% of the Chinook salmon were of Yukon River origin. At the levels seen in recent years, this has likely had and will continue to have a significant impact on Yukon River salmon and should be considered in the cumulative impacts of this RMP

<p>Another issue which should be considered are the impacts of <i>Ichthyophonus</i> on Yukon River Chinook salmon. This fish disease was first reported in Yukon River salmon in 1985 and disease prevalence has reached as high as 45%. Presence of the disease correlates with warming temperatures in the Yukon, although a direct cause and effect relationship has not been shown (Richard Kocan, personal communication). While the precise impacts on spawning are not known, the disease most likely affecting pre-spawning mortality. Because the disease gives salmon a strange flavor and texture and do not dry properly, fish which have developed signs of the disease cannot be used for human consumption.</p>
<p>The impacts of reasonably foreseeable development on non-BLM land on Yukon River salmon should be considered. Other development projects including but not limited to the oil &amp; gas development of the Yukon Flats National Wildlife Refuge/Doyon Land Exchange and the Donlin Creek mine, if developed, will have their own impacts on Yukon River salmon runs which must be considered in combination with the impacts under the BLM RMP.</p>
<p>The draft plan should also address resources such as salmon, and caribou that migrate across the international border in the Black River region. The draft plan should acknowledge land protection and management systems for migratory populations that have been employed for neighboring lands in Canada and describe options that would assure mutual benefits for both countries through the integration of conservation measures.</p>
<p>Management of fisheries and aquatic habitat must be flexible and progressive in order to be effective. Stream reclamation and habitat improvement activities must also incorporate climate change. All habitat and population enhancement projects, particularly those anadromous streams that will have the greatest snow-rain transition, will have increased difficulty in attaining goals and recovery targets. Most recovery plans typically do not account for climate change and as a result inaccurately predicts the success of efforts. Habitat restoration and protection will further help mitigate climate change impacts to healthy fisheries, reduce or slow the result of the warming trends in Alaska's waters. (Ruckelshaus et al, 2007)</p>
<p>The BLM must work closely not only with other federal agencies, but also with state and local authorities. The BLM should consider creating a working group or become more closely involved with an existing working group for current and future management, monitoring and studies. E.g. the Yukon River Drainage Fisheries Association; Yukon River Panel; Yukon River Inter-Tribal Watershed Council; Council of Athabaskan Tribal Governments; and Alaska Native Science Commission.</p>
<p>The Yukon River is fundamental to the Bering Sea ecosystem as it provides nutrients through sediments and dissolved solutes. Processes that influence the Yukon therefore influence the Bering Sea (Barbets et al, 2000). Despite its remoteness and perceived invulnerability, the Yukon River Basin is changing as a result of various sources. The area is experiencing warming on average of 1.4 degrees Fahrenheit per decade which has great impacts on water quality and disease occurrence for resident and anadromous fish species (Chapman and Walsh, 1993). Salmon and other fish species require adequate water quality for their survival as does the abundant wildlife present in the Yukon River basin (Barbets et al, 2000).</p>
<p>Yukon River <i>Ichthyophonus</i> (Ick) has increased in prevalence in Chinook salmon populations of the Yukon River. The prevalence of the disease increases with higher water temperatures in the later summer months, the proliferation of the parasite is shown to be linked to these higher water temperatures. The source of the infection is unknown and juveniles do not appear to be impacted. Resident fish, such as the burbot, that feed on the returning salmon are suffering increased rates of mortality and may become an avenue for juvenile Chinook infection (Kocan et al, 2004).</p>

<p>The Yukon River Chinook are currently listed as a ‘stock of yield concern’ by the Alaska State Board of Fisheries under the guidelines established by the Sustainable Salmon Policy. This summer subsistence fishing has been restricted in Alaska. Canadian access has been limited to aboriginal uses only, who have voluntarily restricted their harvest for the future health of the species.</p>
<p>Studies that examine the impacts of small scale mining tend to define the decreases in water quality as short term – which is defined as the individual summer season within which the operation is functioning – and local – which is defined as within 500 feet downstream of the operation (Field Studies, 2002). But the scale and size of the impacts within a stream are not looked at cumulatively with the number and dispersal of the mining operations nor is the human scale of time and area necessarily the accurate analysis level for these studies. Aquatic invertebrates have a short lifecycle, typically a few weeks to a couple of years making the disturbance term ‘forever’ in terms of many local populations. Similarly, fish populations, particularly in their most susceptible juvenile stages, can suffer greatly in a season. Sedimentation from small scale mining may only reduce spawning habitat for the summer within a certain area downstream of the development but without suitable and adequate spawning habitat one season can lead to long term impacts (Field Studies, 2002).</p>
<p>Oil and gas can be just as destructive as mineral development. According to the Pembina institute, one of many organizations that have reviewed the impacts to fish and fish habitat from oil and gas development, impacts include: Fish kills from leaks and spills - which also impact aquatic insects resulting in food web changes, limitations, contamination and shortages; Sedimentation from road construction and washout – sedimentation increases the stress on fish and can disrupt feeding, growth, social behavior, and susceptibility to disease. Sedimentation also impacts primary production by preventing light penetration and, like mining, clogs streambeds and reduces spawning habitat and survival rates of eggs and juveniles; and Seismic activity can result in damage to swim bladders, livers, kidneys and spleens.</p>
<p>The current management plans for the Fortymile NWSR, White Mountains NRA and Steese NCA prescribe an abundant need for science and monitoring that do not appear to have been completed. We hope that this next RMP will allow for some of these needed studies with priorities on climate change impacts and recommendations for dealing with a changing environment. These studies will aid in ensuring sustainability of the resource for future generations. One example of a necessary study comes from a study prescribed by BLM for the Beaver Creek: Beaver Creek has a small salmon stock that is sensitive to over harvest and environmental factors. Studies are required to determine human impacts on salmon populations. Beaver Creek is a strategic location to study the Yukon River salmon stocks – smaller populations are windows to the larger run and can help determine management objectives (Collin et al, 2002).</p>
<p>In the last five years they’ve been burning up that area [Black River and Salmon Fork] and a lot of the people hunt moose in that area and now you’re see erosion problems from wild fires that have been burning the last few years and in that area is a lot of fish spawning areas and fish migrate up into that area and it’s a wild country.</p>
<p>You get every kind of fish. There’s really good grayling fishing up in that area [Black River and Salmon Fork]. If you get the chance to go up there and study, take your fishing rod with you. There is Northern Pike, sheefish, and three different kinds of salmon that run into that area to spawn.</p>

<p>The Black River is only river in this area that produces whitefish. We have the stream and lakes right over here that go all the way up into that big lake right up there and every fall we got 30-year-old humpbacks coming out of there. Whitefish, is what we live on. We go over there every fall and we allow escapement. We bust the [beaver] dams and let them come out. There are many streams along this entire corridor into the Black River that produce whitefish.</p>
<p><b>Wildlife</b></p>
<p>[Regarding the caribou range map at the meeting] This range boundary for the Porcupine Caribou Herd is kind of a general thing. But, these hills in this region [points to map], right off the line here, have been significant wintering of porcupine caribou in this area that is beyond the range line [shown on the map]. This should be addressed in the plan.</p>
<p>I have a concern about the winter range of the Porcupine Caribou Herd. That the area be protected.</p>
<p>As far as the porcupine caribou herd, there is a lot to be studied in that area with the fish and natural resources.</p>
<p>BLM has never evaluated the impact of the predator control implementation plans and other Board of Game predator control related regulations governing these and other Game Management Units under the NEPA. Nor has the BLM done so under the FLPMA of 1976, Pub. L. 94-579 (90 Stat. 2748), Oct. 21, 1976. That Act requires, among other things, that BLM "manage the public lands under principles of multiple use and sustained yield, in accordance with land use plans" and "shall, by regulation or otherwise, take any action necessary to prevent unnecessary or undue degradation of the lands." Id., § 302(a), (b). The ecological literature from Yellowstone and elsewhere has demonstrated that when predators are greatly reduced, structural and functional changes in ecosystems occur: prey animals become less wary and browse more intensely. Vegetation (such as aspen and willows) is reduced, river shorelines erode and riparian species such including song birds, beavers and amphibians decline: a cascade of negative ecological effects result.</p>
<p>It has been documented that some wolf packs that primarily lived in Yukon-Charley Rivers National Preserve are shot after leaving the preserve. Perhaps as a result, the estimated fall 2006 wolf population in Yukon-Charley reached an all-time low, and was only one-half the size of the fall 2002 population level (source: Federal Subsistence Board meeting materials, April 30-May 2, 2007, page 554). The BLM should coordinate with the NPS to be aware of potential problems caused by state management of wildlife on BLM lands.</p>
<p>The "intensive management regime" authorized in Alaska Stat. 16.05.255(e)-(g), (j) is, in our view, not consistent with federal laws governing wildlife management on federal lands, including those managed by BLM in Alaska. Nor are the extremely liberal bag limits and other rules of behavior currently found in State hunting and trapping regulations which are applicable to wolves and bears. Therefore, when drafting the RMP we ask that BLM carefully analyze and evaluate the impacts of the Board of Game's regulations and Alaska Statutes on the wildlife and wildlife habitat within the Eastern Planning Area and on adjacent federal lands. This should begin with accurate estimates of game populations and habitat carrying capacity, and analysis of the implications for sustained yield of those populations under the Board's current regulations.</p>
<p>The BLM should develop and consider alternatives that, as a minimum, close BLM-managed lands to "intensive management," including aerial predator control authorized under Alaska Stat. 16.05.783.</p>
<p>Trapping at current levels will not impact furbearer populations. However if more trappers were to begin trapping in the Beaver Creek area the population could be over-trapped and reduce the use and value of this resource to current users and future generations.</p>

<p>Trapping should be regulated by federal land managers on federal land to protect the resource from over use in any particular area. Trappers should be required to adhere to the ethics of the Alaska Trappers Association. Under this type of management, trappers could assist resource managers in monitoring and the status and health of furbearer populations.</p>
<p>Trapline rights are personally valuable to individual trappers who have either bought or inherited these rights and they should be entitled to sell these rights as personal property.</p>
<p>Game management units 25C and 25D do not have high enough populations of moose, caribou, and Dall sheep to support hunting guides and outfitters. Individual hunting permits in the Beaver Creek drainage should be reduced. Hunters are already making too big a dent in the caribou, moose, and Dall sheep populations. The populations are too low due to hunting and predation by bears and wolves to support current harvest levels. Guides and outfitters for hunting bears and wolves only may be encouraged.</p>
<p>The EIS should identify the endangered, threatened, and candidate species under ESA, and other sensitive species, within the planning area. The EIS should describe the critical habitat for the species; identify any impacts the RMP will have on the species and their critical habitats; and how the RMP will meet all requirements under ESA, including consultation with the FWS. The EIS may need to include a biological assessment and a description of the outcome of consultation with the FWS under Section 7 of the Endangered Species Act. BLM actions should promote the recovery of declining populations of species.</p>
<p>The ADF&amp;G serves as the primary agency responsible for management of fish and wildlife on all lands in Alaska regardless of ownership. Clarification of this role and a commitment to cooperate with BLM in related matters is addressed in the Master Memorandum of Understanding between the BLM and ADF&amp;G. The State requests that the respective roles of ADF&amp;G and BLM be fully recognized in the plan along with a BLM commitment to cooperation in issues that affect each other's responsibilities.</p>
<p>There is significant caribou habitat within the planning area. Thus, a comprehensive understanding of the cumulative impacts of fire, climate change, landcover, and habitat are needed. Such an analysis needs to be based on the best available quantitative data, and should attempt to identify critical thresholds for habitat and caribou populations. We refer the BLM to Rupp et al. 2002 and 2006 as examples of the types of analysis that can inform the BLM's planning efforts. We encourage BLM to partner with some of the researchers working on such issues in Interior Alaska. For example, Dr. Rupp directs the Scenarios Network for Alaska Planning (SNAP) program at UAF, which can help specify hypothesis regarding fire, climate and vegetation that can be tested in the land management plan.</p>
<p>Wildlife diversity is critical for healthy systems. Boreal song birds, caribou, moose, bear and other animal populations of the interior know no boundaries of state, federal or private lands. In order to enhance/maintain populations and habitat goals both on BLM and adjacent lands, efforts must be coordinated to prevent undermining ongoing efforts. For example migration corridors and enhancement species goals, such as the Fortymile Caribou Herd, require close partnerships with stake holders. According to ADF&amp;G's letter to the Alaska Climate Impact Assessment Commission: 'Changes in species distribution and behavior may necessitate adjustments of management plans and harvest regulations; The effect of climate change on wildfires is of great interest and concern, since over much of Alaska fire is the predominant habitat change agent and since our main big game species are fire adapted in different was. Similarly, we may see a trend where the boreal forest will transition toward grasslands, which would favor a different species mix; It will be important to monitor species expanding their ranges into Alaska that could impact hunted species and other wildlife with conservation concerns.'</p>

We recommend that the BLM review the ADF&G's Comprehensive Wildlife Conservation Strategy, 'Our Wealth Maintained: A Strategy for Conserving Alaska's Diverse Wildlife and Fish Resources.' A resource for prioritizing habitat and wildlife species and to better collaborate with ongoing state efforts.
Wildlife management must include monitoring, habitat considerations and studies, cooperative management with adjacent land holders and a holistic approach to ensure diversity of the system.
Our organizations are greatly concerned about the long term health of certain wildlife populations and wildlife habitat being managed by the State of Alaska's Board of Game within the Eastern Interior Planning Area.
In the last four or five years there's hardly any moose in the Yukon Flats, but this area up here in the Salmon River and Black River area was identified by our late traditional Chief, David Salmon as a moose calving ground and he identified that area for the last 10 years. I look at that area as a corridor for moose into the Yukon Flats and if we go developing it right now, what's the impact of the people in the villages that depend on subsistence and way of living? The whole Yukon Flats depend on moose and that whole area along the Canadian border is like a corridor for moose into the Yukon Flats.
This staging waterfowl staging area [Big Lake Area] is the biggest in the area. The Eastern Interior staging area for waterfowl is the biggest in Eastern Alaska.
The migratory wildlife, their habitat and the subsistence uses of those [should be considered].
I have concerns about the Black River area as far as wildlife inventory goes. It would be prudent to take a hard look at the inventory of wildlife in that area. From what I can tell, there has not been a very thorough inventory in that area yet and if there has I imagine it was quite a while ago. By taking an inventory this late in the game, you can potentially miss some wildlife that occurred in the area before but are not occurring there now. Populations may rebound and come back into that area but since there has not been a strong maintenance of wildlife in that area you would just sort of skip those species that have lived there in the past such as Dall sheep.
The Porcupine caribou herd needs some updates on the range just so that we have some better maps for guiding our planning in the future. Also just noting just how sensitive some of these herds are. From what I understand, the forty mile herd used to be almost 500,000 caribou strong. So maybe just keeping an eye on and keeping in touch just how sensitive populations are and how they can change drastically with plans.

### B.3. Fire Management Comments

EPA's main concern from prescribed fires is that smoke will degrade air quality, a statutory responsibility of EPA.
The biggest health risk arising from prescribed fires is from smoke which contains multiple chemical compounds and particulate matter, one of the six pollutants for which EPA has set National Ambient Air Quality Standards (NAAQS). On May 15, 1998, the EPA issued the Interim Air Quality Policy on Wildland and Prescribed Fires to integrate the public policy goals of 1) using fire to restore healthy ecosystems and 2) mitigating the impacts of air pollutant emissions on air quality and visibility. The policy was written for Federal land managers and state and tribal air quality managers to help ensure that plans by Federal Land Managers to conduct more prescribed burns would not result in exceedances of NAAQS. The policy allows EPA to designate an area as a "nonattainment" one if NAAQS are exceeded and when the state(s) lacks a certified smoke management program. Federal land managers should therefore work with the state to ensure they are operating in accordance with state smoke management programs.

The EIS should describe the smoke management program the BLM intends to follow to avoid public health impacts and potential ambient air quality exceedances. The EIS should describe all applicable elements of smoke management: the process to authorize burns; the requirement that land managers consider alternatives to burning to minimize air pollutant emissions; the requirement that burn plans include 1) actions to minimize fire emissions, 2) evaluations of smoke dispersion, 3) actions to notify populations and authorities prior to burns and to reduce the exposure of people at sensitive receptors if smoke intrusions occur, and 4) air quality monitoring, especially at sensitive sites; a public education and awareness program; a surveillance and enforcement program; and a periodic review of its program for effectiveness.

The Environmental Consequences section should describe the impacts of the planned prescribed fires on air quality and visibility. Section V.A.2.b of the policy, Evaluating Environmental Impacts, lists seven pieces of information that should be included: recent historic and projected emissions from wildland and prescribed fires; evaluations of cumulative impacts of fires on regional and subregional air quality; applicable regulations, plans, and policies (e.g., burn plans, authorizations to burn, conformity); sensitive receptors; description of planned measures to reduce smoke impacts; description of the potential for smoke to intrude into sensitive areas, visibility impacts, and results of air quality modeling; and description of ambient air monitoring plans.

The Alaska Interagency Wildland Fire Management Plan applies to the planning area and is reviewed annually. In addition to traditional fire suppression efforts, there is a growing interest in fuels reduction projects adjacent to communities and finding ways to convert woody biomass into local heating energy sources.

The currently liberal wildland fire protection levels should be retained to maintain a near-natural fire regime so important to wildlife. After many years of attempted fire exclusion, the large fires of 2004 and 2005 were a step in the right direction in restoring wildlife habitat productivity. Numbers of moose and other early to mid successional species are expected to flourish in the future.

## B.4. Cultural Resource Comments

In the event that archaeological or historical sites are identified through this planning process, the State requests that the State Historic Preservation Officer be notified. It should also be noted that the State may request that recreational or commercial uses be precluded in order to protect archaeological and historic sites.

The interior of Alaska contains some of the oldest and most significant archaeological sites in the state. Because much of the interior was ice-free during the last glaciation, this area has increased potential for the discovery of very early sites that may contribute to our understanding of the peopling of the Americas. Thick loess deposits on terraces along the major drainages obscure, but also protect, these ancient sites. Known early sites along the Tanana drainage include the Broken Mammoth, Swan Point, and Meade sites. Ongoing studies of interior sites are addressing questions relating to evolving technologies, subsistence, migrations, and environmental conditions in the Late Pleistocene. These prehistoric settlements are often at risk from impacts from modern development.

The interior of Alaska has had a long mining history beginning at the end of the 19th century and continuing to the present. During the early 20th century, telegraph and trail construction essentially opened up the interior. Remains of historic mining camps, equipment and features such as mining ditches and tailing piles are still evident today. Historic mining remains are often at risk from impacts from modern mining activities.

Only a small percentage of all land in Alaska, including interior regions, has ever been archaeologically surveyed. An absence of reported sites within a project area therefore, does not mean that there are no cultural resources. It may be due to a lack of previous survey. It should also be kept in mind that the deeply buried prehistoric sites along the interior drainages are often difficult to locate, and may require that archaeologists resort to deep core testing to identify site deposits.

The Old Salmon Village, the historic village of Chalkyitsik on the upper Black River, should receive protections under the appropriate act: FLPMA, National Historic Preservation Act, and Archaeological Resources Protection Act. The area should be preserved to protect the significant cultural resources 'for appropriate uses by present and future generations' (BLM Land Use Handbook 1601-1, Appendix C). Under these mandates the BLM must 'seek to reduce imminent threats and resolve potential conflicts or human-caused deterioration, or potential conflict with other resource uses... by ensuring that all authorizations for land use and resource use will comply with the NHPA Section 106. Old Salmon Village should be classified under 'traditional use' for long term preservation. In designating the area as such, the BLM must consult with Tribes to determine limitations and goals for the area. Consultation should be conducted with Chalkyitsik.

Salmon Village Goals; 1) Work closely and cooperatively with the Village of Chalkyitsik and other stake holders. A strong relationship should be developed with two way dialogue and open and honest communication of goals and information. 2) Designate Old Salmon Village with the strongest protections for the historic resource. 3) Have an ongoing relationship with Chalkyitsik Village for flexible management of the village site. Chalkyitsik can act as a monitor of the site and identify hazards or needs for the area. A long cooperative management relationship should be established.

## B.5. Visual Resource Management Comments

The primitive recreation areas in the Steese NCA and the White Mountains NRA should be managed for VRM I or II. Anything higher would not meet the goals to maintain the natural setting and character of the area for the primary users.

VRM Class I is the appropriate designation for Wild and Scenic Rivers. All corridors should be managed for Class I.

When determining the VRM for the upper Black River area, the BLM must work closely with Chalkyitsik to maintain objectives and goals for potential special designations and subsistence resource protection.

## B.6. Wilderness Management Comments

The rolling hills south of the Yukon River and the vistas of the White Mountains were especially inspiring, and this area should be preserved as wilderness.

Alaska has more than its share of land locked up and/or preserved for wilderness, lets not make the new plan any more restrictive on use than it already is.

<p>The State requests that BLM adhere to the policy set forth in the Memorandum from Secretary of the Interior Gale A. Norton to the Director of the BLM, April 11, 2003, which states, in part: “Therefore, ...I instruct BLM to consider specific wilderness study proposals in Alaska, as part of any new or revised resource management planning effort, if the proposals received have broad support among the State and Federal elected officials representing Alaska. Absent this broad support, wilderness should not be considered in these resource management plans.” At this time, there is a clear lack of broad support for further wilderness proposals among Alaska’s state and federal elected officials. In the event that any such proposal is considered by Congress or future administrators, the State requests additional consultation with BLM.</p>
<p>In the event that Congress designates new Wilderness in the planning area in the future, the State requests the RMP include a recommendation for the record that any future designations be managed consistent with the special provisions of ANILCA that amend the Wilderness Act of 1964.</p>
<p>The Eastern Interior RMP must identify protections and means to preserve wilderness quality characteristics defined as naturalness, outstanding opportunities for solitude, and outstanding opportunities for primitive and unconfined recreation. We understand that current management prescribes that no wilderness designations can be made – but we consider this a whim of administrative priorities and have seen a record of back and forth closing and opening for review and designation. In light of this, wilderness qualities should be documented with goals for protection to prevent degradation that would preclude future designations (BLM LUP Handbook, Appendix C).</p>
<p>We would like to present the following goals for the Eastern Interior RMP: Goal 1: Document important wilderness qualities on a regional, state, national and global scale. Rational: Much of these areas have been documented in the previous planning processes and only the Upper Black River will take a large amount of original research. Ideally for future land managers these areas should be clearly ranked. Goal 2: Offer the strongest protections possible for identified wilderness quality areas. Rational: Many of the areas (Research Natural Areas) have ideal management regimes under the 1980’s RMPs– closed to mineral development and OHV use. We would like to see these areas remain closed with a focus on the identifying further wilderness quality areas.</p>

## B.7. Minerals Management

<p><b>Locatable Minerals</b></p>
<p>The BLM is a steward of vast stretches of precious public land. All extraction should be balanced with land set aside as wilderness. Know that the 1872 Mining Act is finally on its way out.</p>
<p>There are many mineral prospects, operating mines, and placer districts located within the Eastern Interior planning area contributing to considerable exploration and development activity. The State requests that the need for access for transportation and utility infrastructure to these mineralized areas be recognized. Planning for BLM lands located near or adjacent to these mineralized areas should take into consideration the need for flexibility in planning for access and supporting infrastructure based on land ownership and physical characteristics of the terrain.</p>
<p>While ANILCA Section 401 identifies caribou range and Birch Creek as special values of the Steese NCA, Section 402 provides that mineral development may be permitted. Therefore, as a part of this planning effort, the State requests that BLM include the Steese NCA in the RMP evaluation of the mineral potential of the planning area.</p>

<p>The State requests that BLM consider the permits associated with the development of locatable minerals in a manner that provides adequate flexibility to address site specific constraints and needs. Provisions that would also consider ground pressure rather than vehicle weight may provide greater protection to sensitive areas. In some instances, longer-term exploration projects may require longer-term camps. Flexibility relative to stream set-backs focusing on site specific, rather than arbitrary determinations, may provide better protection for our water resources and allow reasonable development to occur. We request that BLM consider the following parameters when identifying site-specific setbacks include: the type of activity proposed, the potential impacts of the activity, available remediation methods, terrain, permafrost conditions, stream quality, and fisheries resource values.</p>
<p>The existing Record of Decision for the Steese NCA allows for mineral location, oil and gas leasing, geothermal leasing and leasing of non-energy minerals within certain management units. While we understand that this recommendation was never implemented, any decision to change that management direction should be fully addressed in the RMP/EIS.</p>
<p><b>Leasable Minerals</b></p> <p>The State encourages environmentally sound oil and gas exploration and development throughout the state and would appreciate the opportunity to specifically review and comment on any proposed actions that may limit or discourage exploration and development in this area.</p>
<p>An exploration-licensing program has been initiated by the State in order to stimulate exploration in Alaska's unexplored large sedimentary basins, particularly in portions of the North Slope, Cook Inlet and interior Alaska outside of the known oil and gas provinces. The program is designed to complement the competitive oil and gas leasing program. The Division of Oil and Gas is currently adjudicating a proposal for an oil and gas exploration license in the Circle/Central/Crooked Creek area. The proposed license area encompasses about 72,000 acres lying generally east of Central, bounded by Yukon-Charley Rivers Preserve to the east and Doyon-owned land to the north, about 15 miles south of Circle.</p>
<p>Oil and gas, and mineral development is not compatible with the goals of the majority of designations within the Eastern Interior RMP. Wild and Scenic Rivers, National Conservation Areas and National Recreation are special designations that warrant special protections and management. Allowing new development, through the revocation of ANCSA (d)(1) withdrawals, should be seriously considered and critical areas should have limitations and closures. Special places should have appropriate withdrawals put in place with strong interim management.</p>
<p>Mineral and oil and gas development should not be allowed on the upper Black River. Necessary withdrawals should be put in place to protect the municipal water supply and the historic Old Salmon Village site.</p>
<p>Oil and gas development goals: Goal 4: Increase protections from development with the Steese NCA, the White Mountains NRA and all three WSR corridors. This includes considerations for improving operations standards as technology has improved for development, closures and limitations. Goal 5: Appropriate construction should be timed to avoid sensitive life stages for fish. Goal 6: Monitoring before and after development to be able to measure the impacts of development. Goal 7: Establish adequate perimeters for seismic activity to prevent damage to fish bearing streams.</p>

<p>ANILCA Section 1312(a) directs the BLM to manage the White Mountains NRA to "provide for public outdoor recreation use and enjoyment and for the conservation of the scenic, scientific, historic, fish and wildlife and other values contributing to public enjoyment of such area." Section 1312(b) allows, subject to reasonable regulation, BLM to permit the removal of leasable and nonleasable minerals. The 1986 ROD for the White Mountain NRA allowed for such leasing within some management units and regulations to allow leasing of hardrock minerals were promulgated. However, it is not clear if the public land order which would have revoked the existing mineral withdrawal was ever written or if any leasing has occurred. The RMP/EIS should address this issue.</p>
<p><b>General Minerals Comments</b></p> <p>In regards to the Black River and Salmon Fork, anything that affects the health or water quality of the stream can affect the success and productivity of salmon. So whatever designation eventually is decided for that watershed I would like to see that threats to water quality like mining be taken into consideration.</p>
<p>Don't open too much area to mining. There are already lots of negative impacts to the lands.</p>
<p>What are the basis for opening for oil and gas leasing and mineral study on the Black River? How will these decisions be made? What precautions will be there to protect subsistence?</p>
<p>What areas will be considered to open for mineral development?</p>
<p>How will BLM be making decisions on mineral development and what is its impact on Chalkyitsik and Black River?</p>
<p>What is the impact of mineral development on the Black River?</p>
<p>This planning area covers numerous historic mining districts and areas of substantial interest to the mining industry (e.g. Steese and White Mountain NCAs, Fortymile Mining District, Livengood Mining District, Pogo etc.). This planning area has been the focus of numerous exploration companies for almost two decades and several major new discoveries have been made within this part of the state. A very conservative estimate is that more than \$200 million has been spent on exploration in this area in the past 20 years.</p>
<p>The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, small family miners, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Our members live and work throughout the state and the Eastern Interior Planning Area is of tremendous interest to us.</p>
<p>The primary focus of the plan should be minerals.</p>
<p>The plan should include an appendix with a bibliography of all known minerals and mining reports for the planning area. This should include a compilation of all companies that have operated at each of the sites and references to any private data sources that may exist, even if they are not available to the general public at this time.</p>
<p>A map of all mineral occurrences should be developed for the area and included in the plan. This map should also identify all locations where mining has occurred in the past. Most of this information is available through the USGS.</p>
<p>All active state and federal mining claims should be shown on the maps. This data is readily available in electronic geospatial form for both State and BLM claims.</p>
<p>All sedimentary basins should be shown and identified for their petroleum potential.</p>

<p>The Plan should not include new restricted areas and closures to mineral entry. BLM has the tools to manage its multiple use lands without adding special conservation designations. Alaska already has huge areas of federal conservation system units that are closed to all development, including mining. The intent of ANILCA was that " no more" conservation set asides were needed or warranted. Nearly half of the state is already in some form of federal conservation system unit. The very limited amount of land (only those lands managed by the BLM) that is open to multiple use, including mineral development, must be retained in land status designations that allow resource development.</p>
<p>BLM should continue its efforts to conduct modern geophysical, geochemical and water surveys along with geologic mapping and mineral and energy resource studies. We encourage more detailed assessments of the larger blocks of BLM managed land, especially those areas closed by ANCSA Section (d)(1 ) and within the Steese NCA. Up-to-date information will be needed to properly implement the Final RMP/EIS.</p>
<p>Responsible resource development is a priority of the State. We request that BLM consult with the State before taking any actions that could potentially negatively impact resource development on state lands.</p>
<p>We request Required Operating Procedures not include a requirement to remove all water that has been appropriated for mining operations. Removing the water entirely can appear to be a suitable management prescription to avoid impacts; however, this requirement can have many unintended consequences, such as removing necessary water quantity to maintain base flows within the affected drainages. All surface discharges and drainage from mining operations must meet Alaska Department of Environmental Conservation water quality standards at 18 AAC, Chapter 70.</p>
<p>There are recognized coal resources within the EIRMP area including: resources in the Eagle Field, the Circle District, the Steese District, and the Chicken District (Fortymile District). These resources are indicated on the Map of Alaska's Coal Resources compiled by R.D. Merritt and C. C. Hawley, State of Alaska, DNR, Division of Mining and Geological and Geophysical Survey, in cooperation with the Alaska Coal Association, 1986.</p>
<p>It should be noted that the Governor of any state with an approved regulatory program may request that the Secretary of the Interior enter into a cooperative agreement to grant the State the authority to implement the Surface Mining Control and Reclamation Act of 1977 (SMCRA) on federal lands. At present, Alaska has no such agreement in place. However, should coal operations be developed on federal lands in this area, such an agreement would likely be developed between the Office of Surface Mining (OSM) and the State. The agreement would set out the respective roles of the State and Department of the Interior relative to regulation of mining operations on federal lands (Ref: 30 CFR 745). Management and administration of the leased estate remains with the Secretary per 30 CFR 745. (Ref: AS 27.21.010)</p>
<p>The new RMP needs a greater emphasis on the historical, and current, mining activity in the Fortymile. This should be a primary objective. Not an afterthought.</p>
<p>BLM needs to recognize the need for more mining in the area [Fortymile Area].</p>
<p>BLM needs to be more realistic in assessing fees for small miners and users.</p>

<p>As areas become more costly to develop, environmental and operational exceptions may become more common place as an incentive or simply to offset costs. Reducing standards for any portion of mining operations and reclamation is a practice that we discourage. Cost should not be a factor when reasonable standards have been set, particularly in a high metals market. Quotes regarding increases in mineral interest and development with increases in market prices can be found in the 1984 Steese NCA management plan. These same statements can be seen throughout the various Resource Management Plans within the state, all in various stages of completion. The increased market values for nearly all metals are sparking interest in development. Any increases need to be reviewed for impacts with climate change as a portion of the criteria for safe development and operating practices.</p>
<p>As a result of the ongoing and anticipated changes, mining regulations and operation standards need to reflect our changing environment. An example listed by the DNR is the need to engineer and monitor tailings dams for changing permafrost conditions. The stability of formerly reliable resources is shifting and may result in catastrophic discharges of pollutants. The BLM must work to scrutinize mining proposals for operational changes to ensure best practices and prevent both health hazards and expensive reclamation that would be a burden to the public. Further recommendations from the DNR include accommodating changing patterns in precipitation either from increases in yearly precipitation or elevated seasonal flood risks. Placer mining in particular is anticipated to have amplified erosion due to thawing permafrost for which DNR prescribes monitoring – which should be considered the minimum action to be taken and should include operation alterations.</p>
<p>Travel associated with mineral activities will require closer monitoring to protect permafrost and sensitive vegetation as well as prevent increases in erosion. ‘Shortened winter travel seasons will adversely affect mineral and energy exploration and development programs, requiring the agencies to monitor the freeze-up and break-up periods ever more closely’ (DNR, 2008). Monitoring will require notification and posting for snowmachine and OHV travel restrictions during these time periods.</p>
<p>Nearly all mineral development taking place within the Eastern Interior planning area is within a National Wild and Scenic River corridor, designated to be protected, anything below the appropriate standards would be unlawful and irresponsible.</p>
<p>BLM does not appear to have a surface management notification or a plan of operations on file for Full Metal’s exploration activities within the Fortymile Resource Area. However, since the summer of 2006 Full Metal has been engaged in exploratory activities at the Little White Man (“LWM”) and Fish Prospects located within the Fortymile Project Area. In addition, Full Metal may be conducting hardrock mineral exploration on the Drumstick, Eva, Mitchell, Champion, Weeno, Lead Creek, and Happy Prospects, all located within the Fortymile Resource Area. Our organizations would like to confirm that the BLM has yet to receive notification or a plan of operations pertaining to Full Metal’s exploration within the Fortymile Resource Area. If this is indeed the case, we request that BLM require that Full Metal provide such notification in compliance with 30 U.S.C. § 22 and 43 C.F.R. § 3809.21(a). Furthermore, if Full Metal’s exploration activities exceed 5 acres of disturbed surface area we request that BLM require Full Metal to provide a plan of operations and conduct the requisite environmental analysis in compliance with 43 C.F.R. § 3802.1-1 and § 3802.3-1.</p>
<p>Additional appropriate campsites above the high watermark along navigable portions of the river for dredging operations in the Fortymile is a need that should be addressed in the new management plan.</p>

I don't think anybody in the community [of Central] would be against potentially opening up some of the Steese area for locatable mineral entry. I don't know why they would be. Areas of interest for locatable mineral entry include Woodchopper and Coal creek. Possibly Sheep Creek if you could get across Birch Creek to get to it.
If you go mining in that area [Black River], all the streams up in that area run into Black River. The old Black River runs in here, Grayling River, Drifting Snow, Salmon River, every river in that area runs into this river and that's a vital area. There was an old village up there where people here came from and wildfires took that old village out. There's a grave site right there. There's [native] allotments in those areas. I mean, it's like it's private land, it's BLM land but this is a refuge and are we looking at trying to protect this area for future generation of use or are we just going to go ahead and develop it and forget about everything else? There's bald eagles that nest all the way up Black River into the Salmon River. That's the area that most people go into to hunt in the fall. But we know that if we need something to subsistence off of, that's the area that we're going to get it and if we go developing it and ruining that area then we're going to end up contaminating our rivers.
Your land [BLM land] and where you want to open up for mining development is due north of the headwaters of our [Black] river. Can you look me in the eye and tell me that my river won't run as brown as that dirt out there after they've done this? I don't think you can.
What areas [in the Black River subunit] will be considered to be opened for mineral development? What areas are considered on your map? What is the basis for opening oil and gas leasing and mineral study on the Black River?
State mining claim on the Mosquito Fork can be worked because the Mosquito Fork is a designated trail, the river is navigable, and the Fork was not classified in ANILCA.
Is that the intention of the BLM to lift some of the D1 withdrawals? So once those people have gotten their claims and that's been finalized, technically you could lift all the D1 withdrawals that aren't wild? So the more people that tell you please lift these D1 withdrawals, the better chance someone might listen or does that not matter at all? But the more input you get the better chance that some of the issues that concerns us in this particular area will be acted on.
[Long-term] camping issues on the North Fork are important and that has been brought up before that there are quite a few people [affected]. They don't have a place to stay. They have to try to keep everything below the high water mark and at a meeting last year we all agreed that it is not environmentally sensible for them to be storing all their things below the high water mark.
The Mosquito Fork needs to be at least looked at again because the State and the BLM have a disagreement about that section of the river so that needs to be resolved and of course we would like to see it to be recognized as navigable and open for mining.
Dredging is one of the lowest impact forms of mining there is and prohibiting dredging on the Mosquito Fork seems mostly like tripping development because these are resources that could be exploited in a very reasonable fashion leaving not a visible mark on the scenery up there. So it seems backwards that that's not happening.

I am not a gold miner but these smaller mining operations, mom and pop operations, have always been a way of income for people in Alaska and it's nice to see the small person have a chance versus the big operations. I would like to see that allowed in a safe manner and how they're doing it pretty much now. I just came off the North Slope and it's incredible the amount of environmental laws that we follow up there but it's a pretty good thing in the end. In a big-scale operation I was totally blown away on the amount of care that's taken from in there and out. There's EPA people standing right there. But the small mining operations, it just seems like in a lot of ways they've kind of got a bad deal, in a way for the small operator versus the big operator, the restrictions part of it on the smaller miners. I would like to see that end held up. It just seems like there are good environmental laws that go along with certain areas and it seems like that it is being followed good now over the years by people but it's sure nice to help the small miner out.

It is really important that small mom and pop type placer mining be given an opportunity to continue to do that. All the safeguards of water quality are in place. I would hate to see that stripped away from people as an opportunity. I am concerned that access is slowly slipping away from the private individual to go out there and try and do something. You don't need a lot, but you need a few basic things to get out there and do it. I just see this slowly eroding and it's hard to put a finger on it but when you're here, you know, if you've been out in this country, you know.

Why can't you limit the type of claims that are put out there too? If you have the ability to create a permit for someone to go in, can't you also create limitations on the type of equipment that they use or the volume of land that they can stake or whatever to limit that? [to allow for mom and pop type operations but not larger mines]. Can you limit it through this plan... like maintaining wild and scenic or other designations?

The big concern in this area is oil and gas development or oil shale and what may become of this community [Eagle] if access easements are given to these operations in close proximity to our community. If we are using the general highway and are going to start building a bridge across the Yukon to access Step Mountain or lands in the Eastern Black for oil or oil shale development, that is going to have a dramatic impact on this community. It will kill this community from what it is right now. Those are the kind of concerns I would like to see addressed in this plan for at least the next 20 years because you know there's a big push for new energy and these oil shale and other things are becoming a lot more economically feasible to do.

[If oil and gas development occurs] there is a long track record of any time mining operations come into an area and access is provided, fish and game in that area are affected dramatically. That would be in direct conflict with the subsistence uses in this area. Without a question, that happens every time you have a large scale mining operation. Whether it be for mineral or for oil or whatever and that's a tremendous concern to me. I want to live here for the rest of my life and I don't want to have, big roads and big trucks going by and every yahoo from Texas up here shooting all the caribou and moose. This is hungry country. We have to work really hard in this area to feed ourselves. We have the second lowest moose population density in the entire state in this region. We have a caribou herd that we're trying to rebuild but we're having a hard time doing it. It is coming up but it's slow and that's all due to access and the growing population in these urban areas and the influx into these regions where there is easy access. That is what we're fighting right now and that's what we're going to fight for the next 20 years. We don't want to close everyone out. But at the same time we really want to be careful about how we open up the land to large-scale operations because that has a bigger impact than anything else on us here. We can handle the small stuff but the big companies come in and they lobby and once they're in, you never get rid of them. Once a road or infrastructure is put into place, it never goes away. It's there forever and with it comes all of the things that we moved here to

get away from. I think you probably hear that echoed by most people who live in these small communities in Alaska, that's why they moved out there.
We don't have the ability to go lobby in Washington, D.C. We don't have the funds or the time. It is not our lifestyle and that's why the trapper and the miner, the small guy, has always kind of gotten the raw end of the deal here because he just wants to go out and be left alone. He doesn't want to spend his entire life lobbying in Washington, D.C. or Juneau.
I am member of the Alaska Miners Association and have been involved in quite a few of the previous plans that have been worked up. There are numerous federal mining claims in the eastern region. I notice the state has filed for ownership on lot of the lands in this area however those federal mining claims that are still being worked, they need to be ensured that they will be allowed to continue to operate and that additional restrictions are not put in place that would prohibit or prevent them from developing or mining their claims.
It would be nice if there was a map that showed mineral resources and energy resources on it in the areas that are being discussed. Just to kind of help us understand what possible developments could result with changing land management.
Do not open too much of the area to mining. There are already lots of negative impacts to the land from climate change. Manage conservatively. Keep the Steese and White Mountains in conservation status.
Does BLM have a policy of full reclamation on mining sites? It may not be possible to achieve full reclamation. Does BLM have a policy that provides for mineral development and that recognizes that land will eventually return to a reclaimed state?
Is there potential for coal in the planning area?

## B.8. Forest and Vegetative Products

I am in support of non-commercial natural resource collecting. At current levels, I do not believe the resources are being harmed. However, I am adamantly opposed to commercial collecting, especially commercial tree harvest. This activity would have adverse effects to wildlife populations, their habitats, and people trying to enjoy these resources.
Juday et al. (1998) outlines the potential effects of climate change on boreal forests in Alaska. Of particular importance to the Eastern Interior Planning Area would be (1) decreases in moisture sufficient for forest growth; (2) continued or expanded tree mortality from insect outbreaks; (3) fire intensity and frequency; (4) spruce reproduction; and (5) changes in habitat associated with permafrost thawing. How will the BLM address these issues and impacts during the next management cycle and how is the BLM looking beyond the next 15 years to anticipate changes in key wildlife and habitat resources to help them adapt to rapidly changing conditions? We recommend the initiation or continued monitoring of daily and seasonal weather patterns, including but not limited to max/min/mean daily temperatures, growing degree days and frost-free season length as important parameters for understanding changes in forest ecology that need to be incorporated into management decisions.
Climate change models tell us that boreal forests are in grave danger. It is important to identify significant ecological habitat within the planning area for protection, particularly within river corridors, for fire-suppression management. BLM should continue with the closures to commercial timber harvesting in the planning area – only allowing subsistence harvests.

There's a lot of elderly people here [in Eagle] on set incomes that really without firewood, a lot of them would be – it would be pretty tough for them and it's going to get tougher so just subsistence lifestyle plus also just the area. Each area has its own unique area like you say but what's happening throughout all the Bush is it's getting pretty expensive to live out there, so access to the land for firewood or logs [is important].

Does BLM give out permits for firewood harvest?

## B.9. Noxious and Invasive Plants

The EIS should contain measures that are consistent with EO 13112 on Invasive Species. We suggest including any existing BLM direction for noxious weed management, a description of current conditions, and best management practices that will be utilized to prevent, detect, and control invasives in the RMP/EIS. The EIS should discuss measures that would be implemented to reduce the likelihood of introduction and spread of invasive species with the proposed management activities. EPA encourages BLM to promote integrated weed management, with prioritization of management techniques that focus on non-chemical treatments first, and mitigation to avoid herbicide transport to surface or ground waters, in the RMP. Early recognition and control of new infestations is critical to stop the spread of the infestation and avoid wider future use of herbicides, which could correspondingly have more adverse impacts on biodiversity, water quality and fisheries.

While EPA fully supports control of noxious weed infestations, weed control chemicals can be toxic and have the potential to be transported to surface or ground water following application. It is important that management direction assures that water contamination concerns of herbicide usage be fully evaluated and mitigated. Herbicide drift into streams and wetlands could adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species. All efforts should be made to avoid movement or transport of herbicides into surface waters that could adversely affect fisheries or other water uses (i.e., use mitigation measures avoid herbicide drift to streams and wetlands, during ground and aerial applications of herbicide such as adequate streamside buffers, mechanical weed removal adjacent to streams, flagging aquatic areas on the ground, spray nozzles that produce larger droplets to reduce drift, use of photodegradable dyes in herbicides, use of GPS technology or ground radio contact with pilots, use of spray detection cards, wind monitoring, herbicide monitoring, etc.).

Plant seeds can be carried from a source area by the wind or migrating animals, on equipment tires and tracks, by water, and on the boots of workers and area users, so care should be taken to implement control procedures in all source areas to avoid spread to unaffected areas. Measures we often recommend at the project level for preventing spread from source areas to uninfested areas include: ensure that equipment tracks and tires are cleaned prior to transportation to an uninfested site; focus control efforts at trail heads and transportation corridors to prevent tracking of seed into uninfested areas; attempt to control the spread from one watershed to another to reduce water as a transport vector; reroute trails/roads around the infestation to reduce available vectors for spread if a localized infestation exists and control is not a viable option; establish an education program for workers and users and encourage voluntary assistance in both prevention and control activities; and reseed disturbed sites as soon as possible following disturbance.

<p>The BLM may want to consider some restrictions on vehicles to reduce potential for reinfestation of the area by noxious weeds after treatment. Also, if sufficient vegetation is killed during ground disturbing activities (e.g., by prescribed burning) it may warrant revegetation efforts. We believe that revegetation (reseeding with native grass mix) should be expanded to seed any site within the control area where the vegetation density is low enough to allow reinfestation or introduction of other noxious weeds, or erosion. The goal of the seeding program should be to establish the sustainability of the area. Where no native, rapid cover seed source exists, we recommend using a grass mixture that does not include aggressive grasses, thereby allowing native species to eventually prevail.</p>
<p>Programmatic direction should also assure that the effects of burning on the potential stimulation of noxious weeds be evaluated during site-specific project level analysis. Prescribed fire has the potential to stimulate weed growth, and can destroy insects that provide biological weed control. Burning followed by application of appropriate herbicides can provide effective weed control. We suggest that such considerations be evaluated for during development of direction and plans for prescribed burning.</p>
<p>Hay can be a source of noxious weed seed. Hay/straw is often used as mulch to slow erosion and encourage seed germination. The Federal Noxious Weed Act of 1974 prohibits the interstate transport of noxious weeds or weed parts, such as seed. The BLM may want to discuss the option of requiring use of certified weed free hay in permits or projects.</p>
<p>The proposed plan should also address the introduction of exotic plants as a result of ATV use and the proliferation of trails into the public lands which can accelerate the spread of exotics. It should clearly identify the existing ecological impacts and the potential for additional impacts. The draft plan should provide estimates of the costs to the taxpayers in additional funds that may be necessary to try to deal with increased exotic plants as a result of ATV use in the BLM administered lands.</p>
<p>With climate change BLM must also aid in monitoring the health of the system, by aiding in the identification and prevention of invasive species. Climate change will allow a greater number of species to expand their range and potentially out-compete valuable traditional resources and disrupt the balance of Interior ecosystems.</p>

## B.10. Recreation Comments

<p><b>White Mountains NRA</b></p>
<p>The [BLM] have actually done a relatively good job managing the White Mountains Recreation Area. I have been a user of the White Mountains Recreation Area and so have many, many people I know. We in Fairbanks really value and appreciate that and I think that the management has been pretty good.</p>
<p>Generally the BLM has done a pretty good job managing that area [White Mountains]. I have been learning more and more about from the management end of what is required. I recommend that the area be managed for primitive use.</p>
<p>I too like the White Mountains. You all have done a great job with the White Mountains. Its probably one of the most visible things around Fairbanks that people participate in. I think everyone pretty much appreciates that. Please maintain the White Mountains as a primitive area.</p>

<p>The White Mountains is in Fairbanks backyard. We do think BLM has done an amazing job of balancing competing interests. I think the hard look does need to be taken for as we go out the next 50 years, how can we protect the area so that we have then what we have today as a value. We like the balance of what BLM calls primitive management, that's a management term, for the White Mountains area. We don't want to see any new roads, rights-of-way or utility corridors type things through the White Mountains. Maintaining the natural quality of Beaver Creek and the natural migratory movements of the Dall sheep and the caribou is important.</p>
<p>I would like to see the White Mountains primitive management area maintained as it is now and not have any new utility corridors or roads going through it.</p>
<p>The White Mountains are a unique and special resource that I appreciate more each time I visit.</p>
<p><b>General Recreation</b></p>
<p>Construction and use of tent platforms will result in minimal impacts to natural resources. However, the materials used to construct the platforms should be restricted to wood and the tents should be made of cotton canvas that will naturally decompose should they be abandoned at the site.</p>
<p>Camping sites should be set-up with human waste facilities to reduce impacts to resources. Campers need to carry out their own garbage.</p>
<p>More cabins would be nice (but I realize they are expensive).</p>
<p>We note that both types of users do utilize the cabins in the White Mt. NRA in winter, but only a shelter; not a cabin, has been provided for the user of the non-motorized trails.</p>
<p>Recreational uses should be focused in areas that do not have significant mineral potential.</p>
<p>I ask that BLM keep trails and facilities the White Mountains NRA and Steese NCA in the relatively primitive condition that currently exists. People wishing to experience nature in more developed or "safer" circumstances can stay on the trails near the road or visit some of the state recreation sites along Chena Hot Springs Road. Building more facilities in the backcountry in an attempt to boost visitation and revenues will degrade the wildland experience most people are seeking. The low density of cabins now spaced somewhat evenly across the White Mountains NRA (including some on the rivers) make for a nice experience summer and winter. The level of signage and trail marking is adequate in my experience of having been at all the cabins and down all the trails in winter.</p>
<p>The draft plan should present accurate information regarding current and anticipated trends in public use especially for the Wild Rivers, Recreation and Conservation Areas. It should also provide information regarding how these use levels have affected these areas relative to the legislated mandates for protection.</p>
<p>ANILCA Section 1316(a) allows: "On all public lands where the taking of fish and wildlife is permitted in accordance with the provisions of this Act or other applicable State and Federal law the Secretary shall permit, subject to reasonable regulation to insure compatibility, the continuance of existing uses, and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities..."</p>
<p>We would appreciate including in the plan a note that, in addition to any commercial permits required by the State, commercial guides operating on state lands within the planning area are also required to register with the DNR.</p>

<p>The State’s primary recreational interest in BLM lands both state-selected and non-selected, is continued recreational access for both motorized and non-motorized uses. Equally important is management of these lands so that the land is not subject to damage by such use. The State’s goals and objectives relative to recreation can be found in the Statewide Comprehensive Outdoor Recreation Plan. State area and management plans and the publication Generally Allowed Uses on State Land should also be considered in developing management recommendations for state selected lands and federally owned areas adjacent to state lands.</p>
<p>In previous planning efforts, the State has firmly asserted that limiting general user days is usually not a viable option for managing user conflicts in rural Alaska. This includes such management approaches as mandatory registration or permit systems, and seasonal closures not based on physical resource concerns. The planning area consists of relatively remote areas, as well as more developed locations, providing a diversity of opportunities that may offer something for everyone, and thus reduce the potential for user conflicts. However, where user conflicts do exist, and the plan proposes use limits for mitigation (even if through a subsequent planning process), the BLM is effectively limiting itself to one set of tools. An example of available tools for managing public use is found on page 47 of the 2006 Denali National Park and Preserve Final Backcountry Management Plan. We recommend using the least restrictive tool to address user conflicts including education, voluntary registration systems, and enforceable stipulations for commercial operators.</p>
<p>We request that anywhere the RMP may recommend implementation or “step-down” plans after the RMP, that a Benefits-Based Planning system not be used. We do not believe the one-size-fits-all Benefits-Based system accurately represents the opinions of all user groups and the type of management action they would like to see.</p>
<p>It [the RMP] needs to address the issue of recreational mining by opening more of the area for recreational mining, whether using a gold pan, highbanker or small suction dredge. The Fortymile is a historical mining district and a great part of why people come to see this area.</p>
<p>Our organizations support the current primitive and semi primitive recreation management zones. We would like to see a continued focus on the ‘undeveloped recreation-tourism market.’ A focus on the undeveloped market requires a Special Recreation Management Area designation – for which we advocate and support.</p>
<p>The boundaries of primitive and semi-primitive areas should be maintained. We see the current designations as a balance for outdoor enthusiasts and each area fills a different ‘recreation niche’ within the Steese NCA and White Mountain NRA: motorized and non-motorized recreational opportunities. (BLM Land Use Handbook 1601-1, appendix C)</p>
<p>According to the Land Use Handbook 1601-1, BLM must: [W]rite explicit recreation management objectives for the specific recreation opportunities to be produced and the outcomes to be attained (activities, experiences, and benefits); Prescribe recreation setting character conditions required to produce recreation opportunities and facilitate the attainment of both recreation experiences and beneficial outcomes.</p>
<p>Recreation Goals: 1) Maintain existing primitive and semi primitive recreation zones within the Steese NCA and White Mountains NRA. 2) Recreation management objective should be clearly stated in the RMP, a great example of layout can be found in the Proposed White Mountains RMP/EIS (BLM should focus on clarity in language and presentation. The layout of the EIS should be easy to follow and explicit in its disclosures). 3) Clear disclosure of visitor health and safety, user conflicts, and resource protection issues. 4) Clearly identify management, monitoring and administrative report actions.</p>
<p>The brochures make it sound like Birch Creek is a non-motorized river. It’s non-motorized access to the put-in and take out and full motorized access elsewhere apparently. The brochure should reflect the real situation.</p>

<p>We would like a decent boat launch [on Birch Creek]. The State boat launch is real good for a little 13-14 foot john boat. But if you try and put in a turbine jet boat, sometimes you back all the way across that river and you can't get any deep water. See if you can get permission where we can put a loader in and dig in a spot where we can get into. Birch Creek public access point. It is not a decent launch.</p>
<p>The best place [for a boat launch on Birch Creek] is up higher above the bridge. The waters a lot deeper up there. That is where you folks put in your canoe landing, on this side of the bridge. If they had put a boat launch in there, it would have been perfect. There is a nice deep hole in that area. If we could have a boat launch there it would be ideal. That is what the whole community [Central] wants. At 140 mile, at the canoe launching area. It's a beautiful area there with the bathrooms and everything else [Lower Birch at 140 mile]. We could get enough volunteers here to provide the manpower to build it. A lot of people would like to see it done. It would be ideal because that is a deep spot there.</p>
<p>There is no handicap access there at Birch Creek. When we do something, we have to have handicap access.</p>
<p>Do you have any literature showing where we can go and mine right now say high banking? Recreational mining?</p>
<p>Down at the South Fork Bridge, you have a really nice partition up there and it tells what you can use and what you can't use in that water. I mean, I haven't investigated there at the Mosquito Fork pull off, but that seems like the ideal place to have [the information posted], no dredging, end of discussion. If you go down to South Fork and you look at that board, it is very confusing when you read that paper. It says two different types of dredging there. Why can't you just put up a sign that says, no dredging with a dredge, panning only. That's English. It's clear. There's no question. So many people up here who come up here to enjoy our beautiful state and happen to come out the road where we are, don't get bumped off the Mosquito Fork because there is the gray area. Why not make it black and white. No dredging with a dredge, period. I mean, it makes sense to me. And you got that beautiful partition there. I don't know what it cost the State for that to be there. That's the perfect place to stick it. No dredging.</p>
<p>You all don't do anything to those guys who are parking over there all the way up the road there [Taylor Highway]. They're motorized vehicles. They park all over the place there.</p>
<p>BLM needs to do a better job at letting people know what is and is not allowable. We don't want to be fined.</p>
<p>How about that rest stop at the Mosquito [Fork] right there? There's no dumpster there and from what I heard there was one there last year. You go look at those spots where people have been pulling over on the side. There's garbage all over. If there's no trash can they all just throw it everywhere. If there was a trash can there that would eliminate that.</p>
<p>How about hunting season around here [Taylor Highway]? It closed on Monday after it opened on Friday last year. It was very short. August 10th for Caribou and last year they closed it on the midnight of the 12th.</p>
<p>One of the big concerns that we have in our area here is the impacts and the increased statewide effort for harvesting caribou out of the Fortymile Mile herd and most of this takes place over in the Chicken Ridge area. We've got a lot of concerns about the increased pressure from urban hunters, both Anchorage, Fairbanks, Fort Greely or whatever, flooding into the area and closing the caribou down within the first 24 hours. We have managed through the Fish and Game process to have some special hunts in our area but I think most of us see the writing on the wall. It's just going to continue to increase unless some kind of restrictions are put on that hunting area in the Chicken Ridge area.</p>

## B.11. Travel Management

<b>White Mountains NRA</b>
White Mountains NRA and Dog Musers: If you invited mushers to make the recommendations they could improve the access and staking of animals. For instance, some cabin approaches and departures are dangerous for dog teams. A simple stake out system would make it easier for mushers to stake out animals and would concentrate the area impacted by dogs.
Something has to be done about the damage being done to the trails and ecosystem in the White Mountains by 4 Wheelers. It is a crime against nature and everyone else who uses the area. Manage them properly!
A well-maintained trail from the end of Nome Creek Road to Beaver Creek would be nice.
Our family owns a homestead just beyond the McKay Creek Trailhead, at 43 mile Steese Highway. We occasionally use 4-wheelers to go berry picking or hunting. We sometimes go west from the top of the ridge-which is not a designated trail, but is often times in better condition than the Ophir Creek Trail. I think the existing trail should become a designated trail with improvements in boggy sections to allow one solid trail, to keep people from searching out firmer ground. The result is multiple trails through the bogs, forming a braided system of muddy and messy torn up tundra. The same can be said of the boggy areas of the Ophir Creek Trail. Invest some money in the worst sections of the trail that are either impassible or prone to damage from 4 wheelers attempting to pass in wet weather or trying to create new trails around the torn up areas. By improving the worst sections of trails, more people can access more of the area and there will be less damage to the tundra.
When the conservation plan was developed for the White Mountains, I personally wish that a more conservative policy had been taken with regards to the use of off-road vehicles during the summer time in the White Mountains. I think that most of the staff of BLM are well aware of some of the damage and problems that have developed over allowing off-road vehicles to be used in the summer time in sensitive tundra areas. There has been a significant amount of work done to try to rehabilitate some of these areas and stabilize them, etc. Looking back I think that a more protective, restrictive policy would have been wiser for that area. So what I am recommending is that through this planning process you go forward with the learning that has taken place in the White Mountains on summer use of ATVs in tundra areas. That we try to prevent impacts to the land, the vegetation, the soil, the water that we know happens when these vehicles are allowed to run in the summer time without adequate restrictions.
As far as new trail designations or new motorized activities or new trails in general I would like to see the area pretty much stay status quo. I think what I have heard from BLM is that there is a pretty good idea of use and impacts and it seems to be kind of working. But I would like to see it managed pretty much in the same fashion as now but with a primitive sort of outcome.
<b>17b Easements</b>
This comment is about the 17b easement from the Taylor Highway to Glacier Mountains. It starts near mile post 145 of the Taylor Highway and goes more or less in a westerly direction to Glacier Mountains. My concern is that the land status Fortymile map does not show this easement going all the way across native land to public. The public land is used for hunting.

<p>Hunting has been of great importance to people living in the Eastern Interior. The public supports ADF&amp;G management programs to restore and maintain abundant big game populations and the hunting opportunities such programs provide. The BLM has historically allowed ADF&amp;G and public access on the lands it manages for purposes of management, hunting and trapping. I strongly encourage the BLM to protect public and ADF&amp;G access to public lands for these purposes in the future through the current planning process. To this end all historical trails should be identified and easements reserved to protect public access in the future. This will be especially important to protect public access to public lands and waters in the event of future land conveyances to Native regional corporations.</p>
<p>All 17(b) access routes should be shown on the plan with their identifying name and/number.</p>
<p>In the event that 17(b) easements are proposed for termination, the State requests that interested parties, including the State of Alaska, be given adequate public notice and opportunity to participate and comment. Also note that, in accordance with ANCSA 17(b) and regulations implementing the statute, an easement may not be terminated solely due to lack of use. We suggest the following language address termination/relocation of 17(b) easements: "Easement relocation and termination would be subject to public involvement."</p>
<p>Consistent with other BLM plans, we request that BLM utilize the following language to describe 17(b) easements: "Section 17(b) of ANCSA provided for the reservation of easements across Native Village and Regional Corporation lands to provide public access to publicly owned lands (including waters) for the purpose of recreation, hunting, transportation, utilities, docks, and other similar public uses. The BLM is responsible for identifying and reserving these easements during the conveyance process. The management of these easements lies with BLM or, under a Memorandum of Understanding, the appropriate federal land manager (i.e., USFWS, NPS). The BLM does not have a similar agreement for transferring easement management to the State of Alaska. Consequently, BLM retains management responsibilities for easements reserved to access state lands."</p>
<p>While BLM has management authority for all 17(b) easements we realize that there are challenges associated with the management of these easements. We suggest establishing a mechanism by which to address the sometimes conflicting concerns of landowners, easement users, and easement managers. In addition, the public would benefit from efforts to: more accurately describe easements; ensure that easements are continuous and avoid environmentally sensitive areas; mark easements; and inventory the status and condition of these easements.</p>
<p>As lands are conveyed, we have a real concern about the 17b easements not being where they need to be.</p>
<p>Ensure access across native land through 17b easements.</p>
<p>Consider 17b site easements for airstrips. Two airstrips of concern are Molly Creek and Joseph Creek. ADF&amp;G uses these strips for wildlife work and private individuals also use these airstrips.</p>
<p>Can you store fuel on 17b easements? There may be a need to cache fuel in places for air based survey work.</p>
<p><b>R.S. 2477 Rights-of-Way</b></p>
<p>In the absence of specific regulation or law, the validity of all RS 2477 rights-of-way is determined on a case-by-case basis, either through the federal courts or by legally binding agreement of all landowners. The State requests that easements and rights-of-way be identified in this planning effort.</p>

<p>Consistent with other BLM plans, we request that BLM use the following language to describe RS 2477 routes identified by the State of Alaska: “Under Revised Statute (RS) 2477, Congress granted a right-of-way for the construction of highways over unreserved public land. Under Alaska law, the grant could be accepted by either a positive act by the appropriate public authorities or by public use. “Highways” under state law include roads, trails, paths, and other common routes open to the public. Although RS 2477 was repealed in 1976, a savings clause preserved any existing RS 2477 right-of-way. The State of Alaska claims numerous rights-of-way across federal land under RS 2477, including rights-of-way identified in AS 19.30.400. The validity of all RS 2477 rights-of-way will be determined on a case-by-case basis and outside of this planning process.”</p>
<p>The new management plan should include provision for identifying and rehabilitating historic RS 2477 trails to provide reasonable access for remote miners as well as general access to public lands in accordance with the Fortymile Management Framework Plan of 1980, Lands Decision Lands 5.3 and Recreation Decision R 2.7. Trails recommended for designation are RST 379, RST 1832, RST 656, RST 789, and RST 391 since the case files on these are extensive.</p>
<p>The new management plan we feel should address some of the RS 2477 issues in the area. We have a lot of trails and a lot of them are very old and they’re very well documented and we encourage the BLM to take another look at some of these trails.</p>
<p>Check out the status of RS 2477 Portage from [Circle] Hot Springs to Steese [Highway].</p>
<p><b>General Travel Management Comments</b></p>
<p>Keep and upgrade (and maybe a few additional ones-but only if well planned) existing ATV trails in the White Mountains and Steese Conservation Area.</p>
<p>Maintain plenty of ATV-free hiking trails.</p>
<p>I would like to see more access, “more sustainable trails” available for older people, we still have the spirit, but can’t hike any distance loaded down with a pack etc.</p>
<p>I want the ATV guidelines changed to take in the fact that ATVs have gotten bigger and weigh more and can carry more. For example, Polaris 6x6 sportsmen 500 cc. The rules should allow a higher GVW but limit the cc’s of the engine to say 750 cc and a width of 50 inches for example, so that the size of a unit is restricted.</p>
<p>Any proposed expansion of Off Highway Vehicle (OHV) uses in the planning area should be discouraged. OHV use should be limited to existing designated trails to prevent irreparable damage to vegetation, tundra and valuable wetlands.</p>
<p>Given the Eastern Interior’s location adjacent to on of Alaska’s largest population centers, it would be prudent to allow the residents of Fairbanks and the surrounding areas to have hiking, skiing, snowmachine, or other forms of transportation and none of these should be restricted or limited. I’ve seen the trails caribou migration leaves in the tundra and human forms of transportation are no more destructive than natures to the land. And when considered in the grand scheme of things, the impact a trail/road makes is small and outweighed by the benefits received.</p>
<p>It is my hope and many other Alaskans that you not lock up more of Alaska by creating a new plan for this area that limits access due to the environmental impact or for any other reason. We should be utilizing this land resource for hunting, fishing, exploring, camping, boating, playing, and perhaps even mineral development when done properly. Being able to venture out into the wilds of Alaska is what separates this state from every other. Lets not ruin it by making it all unusable via more rules and restrictions.</p>

<p>The plan should provide for future use of motorized snowmachines, ATVs, UTVs and small tracked vehicles because the area is so vast. It is simply not feasible to disperse hunting pressure and reasonably salvage and transport meat from moose and caribou without the use of motorized vehicles, especially for older hunters.</p>
<p>By no means inclusive, examples of important existing trails that should be identified and protected for future use include the Kechumstuk, Mitchell's Ranch, Caribou Creek, 103 Mile and Liberty Creek Trails. Also, the trail system south of Boundary and trails in the West Fork, Mosquito and Middle Fork drainages are also important for hunting access.</p>
<p>Alaska Quiet Rights Coalition (AQRC) is a statewide nonprofit organization with approximately 600 members/supporters throughout Alaska. We believe that natural sounds and natural quiet are resources deserving the same sorts of protection that land managers provide to other natural resources, such as wildlife or clean air. Management of recreation on public lands needs to be both fair and balanced, and that quiet recreationists deserve equal consideration with motorized recreationists in the allocation of high quality recreational opportunities. AQRC seeks to protect wildlife, home and cabin owners and a wide array of non-motorized users from the noise and other impacts of motorized recreation on our public lands, waters and in the air.</p>
<p>We recognize that BLM is a multi-use agency. We believe this multi-use mandate does not require that every trail or area be open to both motorized and non-motorized users; rather, separate areas and trails, i.e., spatial separations or temporal closures, are well within a multi-use requirement. We continue to maintain that a trail or area designated "open", in fact precludes the non-motorized recreationist, due to the noise, odor and other adverse impacts recreational machines impose on the experience the nonmotorized recreationist seeks. Insofar as BLM manages its lands for recreation, it must provide a fair and balanced allocation to the non-motorized recreationist.</p>
<p>There is a consensus among AQRC members/supporters who have recreated in the White Mountains NRA and the Steese NCA that considerable resource damage has been inflicted by summer OHV users. Not only have the trails, soils and water been damaged by irresponsible riders, but off-road travel has created ever-widening sets of "new" trails, damaging the soils, streams, wetlands, vegetation and adversely impacting wildlife. This damage was verified in BLM's preliminary drafts developed in connection with the efforts in 2005 to revise the White Mt. NRA RMP. AQRC recommends that at a bare minimum, BLM restrict all off-trail riding and limit travel to officially designated trails. Without such restrictions, we question the long-term value of trail "hardening" techniques, for it enables more riders to go further into the backcountry and invites them to make "new" trails.</p>
<p>AQRC is also concerned that BLM will simply adopt the state's "Generally Allowed Uses" policy, which any minimal field work and analysis shows has not worked on state lands.</p>
<p>Since enforcement is key to curbing established patterns of irresponsible riding, the plan must provide for enforcement staff and equipment.</p>
<p>We urge BLM to expand areas and trails and opportunities for winter non-motorized users to recreate without hearing, seeing or experiencing motorized recreation. Only three trails in the White Mt. NRA are designated closed to motorized recreation; two of which are quite short.</p>
<p>The Plan must include effective transportation planning provisions. Broad latitude must be included to allow development of new transportation infrastructure in the most feasible ways possible. The need exists to establish a straight-forward predictable process to develop future infrastructure. We do not know exactly where all of the mineral and energy resources are located so we cannot predict where and what types of transportation infrastructure will be needed. Surface access is a major issue in the planning area and must be treated as such.</p>

<p>All roads, trails and historic access routes should be shown on all maps and identified with their BLM and/or State of Alaska identification numbers. These should include all trails, whether they qualify as RS-2477s or not. Those that do qualify as RS-2477s should be so identified. An appendix should be included to provide a comprehensive list of all trails of every type.</p>
<p>The plan should include and integrate the State of Alaska land selections that were established for access roads, everywhere they exist in the planning area.</p>
<p>The impacts from recreation, subsistence activities, and access should be analyzed and reported in the EIS, particularly those impacts associated with vehicle usage. Impacts from off road vehicle (ORVs) and snowmachine use can result in habitat destruction, increased sedimentation to water bodies, noise and air pollution. The EIS should disclose all impacts associated with such activities and describe what actions will be taken to manage recreational, subsistence and access opportunities in the project area. EPA specifically encourages BLM to control and direct OHV and snowmachine use to protect resources (i.e., wildlife habitat and security) and prevent erosion, including adequate policing and enforcement.</p>
<p>Some federal land management agencies have policies that prohibit off-trail snowmobile use until at least 6 inches of snow has accumulated. Snow in arctic and sub-arctic areas is highly susceptible to wind movement which can leave bare or thinly covered areas that would be difficult or impossible to avoid given the speed of snowmachines. Fragile tundra vegetation may need similar protection against such use.</p>
<p>I would like BLM to continue managing some areas or trails along the road system that are restricted to non-motorized use, either seasonally or year-round. The non-motorized Summit Trail from mile 28 Elliot Highway to Wickersham Dome is an example that provides people with an opportunity for quiet hiking, wildlife watching, or hunting without unduly restricting motorized access to the general area. The Alaska Board of Game has designated non-motorized areas in several sections of state lands along the road system as a means of providing a variety of harvest opportunity in accessible areas. These few “walk-in” areas are great for people willing to work more than the average hunter for a high-quality experience or those not able to afford special motorized equipment (such as younger hunters). There are non-motorized areas in Denali National Park, but these areas limit access for overnight stays by permit, and hunting (even by local subsistence users) is prohibited in much of Denali Park.</p>
<p>I congratulate BLM for building or upgrading trails to sustainable standards and using seasonal closures to avoid damage, especially during the spring thaw. These measures will help ensure good travel conditions for all users, regardless of conveyance.</p>
<p>Adequate funding for law enforcement rangers (including aircraft surveillance) will be necessary to prevent illegal use of trails (thus trail damage) during closures and illegal pioneering of trails into closed areas. Law enforcement is necessary in tundra areas where it is easier to pioneer new trails. Public awareness of closed areas through signage and other education and use of cell or satellite phones to report violations should improve compliance with closed areas.</p>
<p>My observations after moving back to the road system from rural Alaska in 1995 are that the proliferation of OHV use in summer and fall has greatly increased damage to local trail surfaces, many of which were originally winter trails used by miners and trappers when wet ground was frozen. Rutting caused by high traffic volume in summer and poor judgment by riders on wet soils greatly hinders all methods of foot traffic and even snowmachine traffic until enough snow falls to smooth the ruts. Part of the high traffic volume is hunters who use OHVs to endlessly cruise trails in the hope of spotting game. This practice contributes to trail damage caused by traffic volume, and the noise disturbs game as well as other hunters trying to spot and quietly stalk animals.</p>

<p>We are not familiar with all the trails in the Eastern Interior Planning Area, but we ask that trails in the area and public access to those trails be given high priority in the plan. Trails allow access into public lands so that people can take advantage of the resources in the area for a variety of purposes, including recreation, business, and subsistence.</p>
<p>The Eastern Interior Planning Area has some land and water trails that are very popular and important. Among these are the Pinnell Mountain National Recreation Trail, the Yukon Quest Trail, the White Mountains National Recreation Area trail and cabin system, the Fortymile National Wild and Scenic River, Beaver Creek and Birch Creek National Wild Rivers, and the Tanana and Yukon rivers. Those are just the better-known trails in the area. Many other trails and routes are less well known but still loved by those who use them. These include the Horn Mountain Trail to Macomb Plateau, the Tok River, and routes to Mount Fairplay, Mount Prindle, and Mastodon Dome. This collection of land and water trails draw people from all over the state, nation, and world. They are an important resource for many locals as well as an important resource for the state's tourist industry.</p>
<p>We see the following points as being important to the protection of trails and the public access to them: A trail plan within the Resource Management Plan that looks ahead to see how trails can benefit the public in the future; An adequate amount of signs that indicate trailheads, directions at intersections, mileage to significant points, and proper etiquette regarding trail use; Enough funding to keep trails properly maintained to sustainable standards and to improve trails that don't meet those standards; Funds for the development of new trails identified in the trail plan; Sufficient parking at trailheads.</p>
<p>One issue that must be extensively reviewed is use of ATV's (both authorized and unauthorized) during the summer season, when the ground is thawed and unprotected by snow cover. This review should apply to recreational ATV use as well as travel across public lands for other purposes such as access to private holdings or interests (e.g. mining claims). The analysis should include maps, photos and other data regarding conditions that existed in 1980 when the units were established, as well as similar information on current conditions. The plan should provide clear information regarding the nature and scale of resource damage that has occurred, and include both the tangible effects such as erosion, and visual esthetics, as well as the intangible impacts that degrade the public's perceptions of these areas.</p>
<p>It [the plan] should also provide an accounting of the cost to the taxpayers that has occurred from 1980 to present, in efforts to administer ATV use, stabilize damaged areas, harden trails with artificial materials, and monitor and enforce existing rules and restrictions for areas such as the White Mountains National Recreation Area and Steese National Conservation Area. Options and alternatives proposed in the draft plan regarding the use of ATV's should provide similar cost figures that are projected over the expected life of the new plan. Such figures should be compared with costs for administering these same areas if ATV's are prohibited.</p>
<p>All options presented in the draft plan which would allow continued or expanded use of ATV's must reconcile such use with legislated mandates for the conservation areas regarding the maintenance of natural conditions.</p>
<p>The use of ATV's on general public lands not in conservation areas must also be addressed. Restrictions including complete prohibition of ATV's should be applied for areas where there are no specific regulations at this time. These actions should be designed in a manner which will establish strong legal authority for enforcement of regulations and restrictions and assure protection of the public resources. Such rules must be aimed at preventing the type of damage that recently occurred in the Mosquito Flats area, as well as to facilitate adequate enforcement if Anther violations occur.</p>

<p>I would like to advocate that you take a close look at any lands where you do not have regulations in place regarding the weight of off-road vehicles. That you take a close look at that and consider restricting the weight of off-road vehicles in any area where you don't have that regulation at this time.</p>
<p>Some people here are familiar with some rather serious damage that was done a few years ago in the Mosquito Flats area. It is my understanding that when it came to implementing some law enforcement on that it would have been more effective if there were adequate regulations in place on those areas. I hope that this planning process will address any deficiencies along that line.</p>
<p>Section 811(b) of ANILCA, addressing all federal public lands in Alaska, states that: "the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation . . ."</p>
<p>ANILCA Section 1110(a) provides that: ". . . the Secretary shall permit, on conservation system units, national recreation areas, and national conservation areas, and those public lands designated as wilderness study, the use of snowmachines (during periods of adequate snow cover...), motorboats, airplanes, and non-motorized surface transportation methods for traditional activities... and for travel to and from villages or homesites. Such use shall be subject to reasonable regulations by the Secretary to protect the natural and other values of the conservation system units ...and shall not be prohibited unless, after notice and hearing in the vicinity of the affected unit or area, the Secretary finds that such use is detrimental to the resource values of the unit or area."</p>
<p>The State requests that 17(b) trail and site easements be recognized and mapped as part of this planning process so that the public is aware of their location. This will reduce trespass problems and assist the public in gaining legal access to public use areas.</p>
<p>The State requests that BLM consider state transportation planning policies and documents relevant to the Eastern Interior planning area. The State recently released an update of the Statewide Long-Range Transportation Policy Plan and is currently engaged in the development of the Interior Alaska Transportation Plan with completion scheduled for late 2008.</p>
<p>The State of Alaska Department of Transportation and Public Facilities (DOT) is responsible for state airports, transportation corridors, and the ferry system. We request the plan address potential airport expansion for both economic development and for runway expansion as population centers continue to grow and air travel needs of rural communities continue to expand, as well as access roads to such existing and future facilities. Of particular importance in this rural planning area are transportation corridors for resource development and rural airports.</p>
<p>The Aviation Improvement Program makes federal funds available to the State for airport planning and construction projects. Most of the federal dollars spent in the more rural parts of this planning area fall into this category. The State therefore requests the plan support rural airport enhancements and/or expansion where needed for community and economic development.</p>
<p>Of particular interest to the State Department of Transportation in this planning area are the following issues: 1. Material sites – Adequate material sites should be made available where required for existing and future state and local roads and airports. 2. Aircraft landing areas on BLM lands commonly used by the public should be identified and, where not in conflict with land use designations, permitted by the plan. 3. The plan should recognize the State's need for future upgrading, realignment and expansion of its transportation system.</p>

Many of the public lands of the study area are utilized for off-highway vehicle (OHV) use. The State is concerned about protecting continued access to state-owned lands and waters. However, we share BLM's interest in considering management options that reduce, prevent, or mitigate impacts from OHV use in sensitive areas such as wetlands, stream crossings, and important wildlife habitat. We encourage BLM to work with ADF&G and DNR to determine traditional routes of access and protect sensitive areas. Some areas of state lands identified by the Board of Game have vehicular use restrictions for the harvest of fish and game. The Alaska Hunting Regulations describe each area with vehicular restrictions by Game Management Unit. The Board of Game generally addresses OHV management issues in these areas and the State is unlikely to be supportive of further restrictions.

State-selected lands should be managed consistent with DNR policies as outlined in the DNR Fact Sheet "Generally Allowed Uses on State Land". We have found BLM's use of a consistent approach throughout previous plans, consistent with the State's Generally Allowed Uses, to be very beneficial in addressing this potentially contentious issue. We assume this plan will take a similar approach, limiting use to existing trails whenever possible and prohibiting any action that would result in resource damage (see 11 AAC 96.025(2)). Please note that entirely prohibiting off-trail use in any part of the planning area is not consistent with these guidelines.

Please be aware that, in order to implement any OHV restrictions that affect subsistence users, regulations will be needed. Section 811 of ANILCA states: "...the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation..." (emphasis added). OHVs are included as "other means of surface transportation" where they have been traditionally employed for subsistence purposes. As a result, any related limitations must be based on documented resource concerns and require subsequent rule making involving additional public review. This applies to all forms of enforceable prohibitions that are applicable to subsistence users, including vehicular restrictions regarding width, weight, etc., and restricting use to existing or designated trails.

For over 30 years, almost 40, I've hiked, backpacked, cross country skied, gone on backpacking, canoe, and winter camping trips in the White Mountains National Recreation and the Steese National Conservation Areas. I have enjoyed all these times I've spent doing the things I enjoy doing outdoors on these beautiful public lands. Most of all I have enjoyed the peacefulness and quiet, UNTIL, more and more OHVs and snowmobiles began using these public lands. I know that these are public lands for all to use and enjoy, but we can not all enjoy using them anymore when loud, foul smelling snowmobiles and OHVs race up and down all the trails (I have met snowmobiles on the Wickersham Dome trail more than once. Isn't that trail an designated nonmotorized trail?). I've had several very close calls, almost got run over by speeding snowmobilers, had to drag my dog and sled into the brush and deep snow to save our lives.

I'm also very concerned about the overuse and the abuse and damage the OHVs and snowmobiles are causing on these public lands, the trails (boardwalks are falling apart and unsafe to walk on and trails are eroding away into little rivers and ponds in places, vegetation is dying, and I do not see as much wildlife as I use to).

Designate all public lands in your new management plan as "closed" to OHVs or restrict them to a limited area where they can be managed and policed so they do not harass other users and wildlife and do more damage to the trails and the land. If you are going to continue allowing OHVs to use these public lands, only allow OHVs that do not pollute the air and have quiet engines.

<p>There needs to be required education programs for OHV users that covers how to travel safely and the rules of the road. I have never met a snowmobiler that pulled off the trail and turned off his/her engine to let me pass towing my sled with my dog. And never has a snowmobiler slowed down when approaching us from behind and waited until we signaled him/her we were ready to be passed.</p>
<p>Open more areas to nonmotorized users. In the White Mountains NRA there are over 200 miles of winter trails, but only 20 miles that are designated nonmotorized. Why are there over 180 miles of trails for motorized users and only 20 miles for nonmotorized users?</p>
<p>We request that BLM consider increasing legal access to areas included in the plan through relaxing or completely lifting existing restrictions in its full spectrum of identifying lands available for certain uses and restrictions. Specifically we support allowing motorized use and lifting weight restrictions in the White Mountains NRA, Steese NCA, Birch Creek National WR, Beaver Creek National WR, and the Fortymile Resource Area. Hunting and recreational access through various modes of transportation historically occurred in these areas, and we believe it would be prudent for BLM to consider allowing more historical use in its plan alternatives.</p>
<p>We understand BLM must designate all lands either “open”, “limited”, or “closed” to Off-Highway Vehicle use. We request BLM consider designating lands “open” that have not previously been assigned a designation.</p>
<p>We request BLM consider revising restriction for all lands previously designated “limited” to coincide with the State’s Generally Allowed Uses, and not be subject to so many seasonal closures and weight restrictions.</p>
<p>Flexible management is needed to ensure that OHV use do not irreparably damage Alaska’s changing landscapes. Education and monitoring is needed as well as clear trail designation and identification to ensure that unchecked trail widening and expansion does not continue within the planning area.</p>
<p>Recreational OHV use has had major impacts on the planning area. The scarring damage on vegetation and sensitive tundra needs to be ended and strong preventative measures and enforcement need to be put in place. ‘Degraded trails are a significant environmental problem because of their direct effects on vegetation, soils and site hydrology.’ There are also associated effects on wildlife and esthetics. (Meyer, 2002)</p>
<p>Our organizations recommend the study Managing Degraded Off-Highway Vehicle Trails in Wet, Unstable and Sensitive Environments, from USDA Forest Service written by Kevin G. Meyer. Meyer prescribes many ways to deal with and prevent trail degradation including: location documentation, condition assessment, improvement prescriptions, implementation and maintenance and monitoring.</p>
<p>Our organizations feel that there is ample access for OHV uses in the planning area and that current designations of primitive and semi-primitive for the Steese and White Mountains should remain. Ongoing management for these areas needs to be improved to prevent the continued abuse of OHV users and maintain a high quality environment for future users.</p>
<p>As BLM develops and updates travel management, the primary users of the Steese and White Mountains areas must be considered. (BLM Land Use Handbook, Appendix C) For the primitive recreation zones the priority must be placed on the primary user – the backpacker, hiker, skiers, horseback riders, etc. that use the area for quiet enjoyment. The primary means of travel for these individuals should be the only allowed travel in the area to meet the objectives of primitive management and maintain setting characteristics.</p>

<p>A comprehensive travel management plan within the Eastern Interior RMP will establish appropriate travel allowances and restrictions according to prioritized uses and designations. The only appropriate management for the primitive recreation areas is prohibiting all road development. Allowing such development, in some instances may add to the access and enjoyment of primitive users but abuses of road development, such as the proposed ROW through the White Mountains NRA, will only take away from the primitive enjoyment and character of the area.</p>
<p>Inventory existing and designated trails and their condition to identify the level of degradation and prioritize stabilization activities. Once priorities are established improvement prescriptions and implementation must be put in place. Monitoring and maintenance should be a large part of the plan.</p>
<p>Properly document and identify designated trails and prevent the usage and proliferation of undesignated trails. Signs should be created and posted to designate trails and to educate the public on the importance of staying on trails, reporting degraded sites and holding others responsible for the lands we all share.</p>
<p>Education on the impacts [of OHVs] to soils and vegetation should be available to the public.</p>
<p>Due to climate changes there are longer freeze and break-up periods where limitations may be necessary for both snowmachine and OHV uses to ensure that unnecessary damages are not incurred on public lands. This may include more strict weight limits, closures or visitor limitations to reduce traffic in the park.</p>
<p>Prohibit new road development within the primitive recreation zones.</p>
<p>For the Steese NCA, White Mountains NRA, Birch Creek, Beaver Creek and the Fortymile River, the revised RMP/EIS should address current types and levels of access for recreation and other purposes. Existing access restrictions or closures should be fully assessed to determine if they are still needed for resource protection or management purposes. Any decision to implement additional restrictions on types of access or to close areas can only be implemented through the process outlined in 43 CFR 36.10(h). Further, any existing restrictions or closures which may have been implemented without following these procedures should be reassessed and brought into compliance with the regulations.</p>
<p>ANILCA Section 811(b) provides that the Secretary of the Interior "shall permit on the public lands appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation." Because this section applies to all federal public lands in Alaska where subsistence activities are permitted, the RMP/EIS should address this use and how the "reasonable regulation" standard would be applied.</p>
<p>ANILCA Section 1323(b) states: "Notwithstanding any other provision of law, and subject to such terms and conditions as the Secretary of the Interior may prescribe, the Secretary shall provide such access to nonfederally owned land surrounded by public lands managed by the Secretary under the Federal Land Policy and Management Act of 1976 (43 USC 1701-82) as the Secretary deems adequate to secure to the owner the reasonable use and enjoyment thereof: Provided, That such owner comply with rules and regulations applicable to access across public lands." This guarantee of access is similar to that found in Section 1110(b) for conservation system units, but applies to all BLM managed lands in Alaska. The RMP/EIS should address this provision as it applies to future access needs for State lands, Native Corporation, and other private lands within the planning area.</p>
<p>The BLM should consult closely with user groups in identifying the need to make changes to the designated ORV use areas. User groups should also be consulted in developing and implementing a monitoring program and establishing threshold standards that would trigger closures or use restrictions.</p>

<p>Commission staff has reviewed the scoping comments submitted by the State of Alaska on these two important issues [RS 2477 and 17(b) easements]. We encourage the BLM to adopt their suggestions on how these issues should be handled in the RMP/EIS and in the future management of the Eastern Interior.</p>
<p>Alaska Trails welcomes this chance to comment on the Eastern Interior Resource Management Plan. As a nonprofit group that supports sustainable, world-renowned trails in Alaska, our group believes the plan should treat trails as an important resource.</p>
<p>The Eastern Interior Planning Area has many water- and land-based trails. Some of those, such as the Pinnell Mountain Trail, the Yukon River, and the White Mountains National Recreation Area trail system, are popular and known across the nation and even the world. Others, such as the Tok River and routes to Mount Fairplay and Mastodon Dome, are less well known but still used and loved by locals. All of these trails are important resources. They allow people access to wild lands for hunting, fishing, subsistence gathering, and simply to relax and connect with nature. This is important not only for the benefit of locals, but as an important part of the tourism industry that is so important to Alaska.</p>
<p>The Eastern Interior RMP should include a subordinate plan for managing the trails in the 8-million-acre Eastern Interior Planning Area. Such a plan should include providing funding for adequate signage at trailheads and trail intersections, as well as trail mileage markers and proper trail etiquette. It should also plan for improving and maintaining trails to sustainable standards. New trails should be built to those standards. Plenty of parking at trailheads should also be a priority in order to ensure realistic public access.</p>
<p>I floated Birch Creek this weekend [Labor Day weekend 2008]. I ran into 4 motorboat parties in under a half a day in the lower reaches but well within the "wild" corridor. It really didn't feel wild at all. One of the boater bragged about getting his boat all the way up to Wolf Creek the previous week. That makes a majority of this "wild" river accessible by high power motorboats. I would be great to see some restrictions (engine size or distance upstream) or non-motorized weeks/weekends to enhance the river's wild qualities. Also, the brochures make it sound like it is a non-motorized river. It's non-motorized access to the put-in and take out and full motorized access elsewhere apparently. The brochure should reflect the real situation.</p>
<p>To the extent possible, I would like to see the planning objectives meet the State's generally allowed uses. It is really a conundrum when you go from one imaginary border to another and the rules change.</p>
<p>An important part of the scoping process is to get a complete inventory of existing trails. In past RMPs it has been difficult to get a baseline of what those trails are. It should be part of this planning process to generate a complete inventory and allow the public to review that in the planning process. There needs to be a concerted effort to inventory those trails and let the public know where they are.</p>
<p>How can we make proactive comments as far as access in some of these places? I mean asking for more RNAs or ACECs is pretty straightforward and that usually ends up with more restrictions. How can we make a meaningful comment the other way? We want to see some of this stuff opened up. It kind of feels like a one-way door. Also in the past it seems like when we have made more just general comments of at least keep things open at least as much as they are, that looks like such a broad, general comment, it kind of gets disregarded.</p>

I think the trails you do select or the trails that you do have, I have worked a lot on the Knik public use area and our main objective on the whole thing when we started out was not to shut it down to anybody. But to keep it open for all users. In other words, if you are going to have a trail for non-motorized or a trail for motorized, it does not matter, you have both and if they run parallel to each other, so be it. You can separate those trails so they are far enough apart. This user group is not going to hear this user group. Or this user group is not going to see this user group. I think when you do this, you should take that into consideration and make these trails parallel with each other or at least make sure that they are open for both. Don't shut it down for one user group.

If you have to use a multi-user trail, that is good too. Most people can share. I trapped for a long time on the Denali Highway. I heard people say all the time that the snowmachiners mess with the mushers. The mushers don't mess with the snowmachiners. All the time that I trapped out there, I was courteous to everyone of them guys and they will all tell you the same thing and they were courteous to me. It was not like you ran your snowmachine 100 MPH and screamed by them guys. You slowed down when they are passing you coming their way, or you stopped. And that is one of the things that is going on these trail systems is that user groups can get along if they choose to and I think there should be signage out there for that. I think a multi trail will work.

Even in the summer time, you can still stop that conflict [between trail users] if you put the signage up and teach people [trail etiquette].

We would like a recommendation that says every motorized trail that is there remain motorized.

Harrison Creek Road was supposed to be the route that they were going to use for the rest of the trail. It goes through federal and state into the conservation area. It should be shown on the map and should remain a trail, open to the public. That is the only way to get to all this mining ground in here. Historically it was used. They crossed the Steese National Conservation Area so that they could take that part of the road away from us. That's what they done. They did a lot of the studies and measurements but I never heard any more about it.

People have concerns about Frying Pan Creek Road. But, they are not here. They are out working on their mines. There are mining claims along in there. They did put a trail over to the Birch Creek several years ago. It is on the other side of the mountain and goes back. So they [the State] must have some plans for that because otherwise, BLM wouldn't have let them put it in there.

Public access is one of the big issues. Public access is for everybody. It is not for an elite group. It is for everybody. There are rules and regulations for any access and anything you do today. People are responsible for their own actions. If they do something wrong and get caught, that is their problem.

I was wondering about this historic lands. They were talking about historic trails at this one meeting and they were talking about some of the trails, you know, some of the trails and whatever we were using a long time ago and they were trying to identify it and stuff like that, and I was wondering, those historic trails, especially the old side of Chalkyitsik and the ones we use like for hunting and trapping and stuff like that, I was wondering what happens to those because if we use it traditionally I don't think we should give it to the public since it's ours.

Generally speaking, every time a trail is designated it is [designated as] year-around usable. I would look very carefully what impact it makes on the land and the resources around it. Or the subsistence resources around it because that's a big potential problem. If it is limited to winter access, it's way different, way less people will use winter access and the damage is very limited to the ground and to the environment. When if it's [open to] off-road vehicles in the summer or year-around access, then you get into major trouble and here comes the invasive plants. That access should be carefully looked at because most people really if they want to be recreational don't have to go driving for 30 miles on an all terrain vehicle through the countryside.

The thing that scares me about the term management is too often we want to use a definition of denial and call it management. Denied access to any of that area by any specific means other than something ridiculous like a piece of heavy equipment is not managing. The weight of the piece of equipment does not necessarily directly and proportionately equal the impact that it has. What we are talking here and this is a terrible thing for you folks to even try to figure out how to try and manage, and that is individual attitude. Because attitude of use is directly proportional to damage. When I wrote the 1500 gross vehicle weight issue back in 1983, it was the only comment paper of its type that was offered. Thus it was accepted. There could well have been mistakes there. But the reason I chose that was based on footprint pressure of the particular types of vehicles of that time frame. Not on the total weight necessarily that the vehicle displaced. The footprint pressure that was used at that time was less than a snow machine track, even by today's standards with the wide long tracks would exert on the tundra. I hunted that area I have hunted it since the late 70s I would defy a person to follow me given 30-45 minutes of recovery time of where my vehicle rolled over the tundra. But you take any young person or any person period with a bad attitude and a big go fast four wheeler that wants to show off in front of his buddies and squirt dirt and see if he can make it through the mud bog and get suck or not has a definite attitude that he does not give a darn about what damage he occurs. How to you manage that? You can't. You can look at all the uglies that do in fact exist in the White Mountains right now because terrain dictates trail. And you can point the finger at these people who use off-road vehicles and say oh look at those shameful people. And yes there were some shameful people or you would not have that impact.

Think about this and try to come up with some sort of a solution that will allow folks that need ATVs to enjoy that countryside still be able to do it. None of us advocate that the whole thing be blown wide open. I think it is rather good we have the one river basin up there that is no ATVs. The animals need a place to get away from that impact. If any of you have been here for many years you understand what happened just with Chena Hot Springs Road when they went from the narrow road to the road we know of today. You see very little animals along that road when you drive that road back and forth. I used to live out there years ago. It was lets go dodge the moose to get to town this morning. So anytime you do anything like that it affects the wildlife in the area. Road access through there, established trails are the worst thing in the world. Because now you are forcing someone to go over the same terrain time and time again. Regardless of how he uses his vehicle to traverse that area. Most of that area up there, you can run 200 bicycles nose to tail over the same piece of ground and you are going to see the impact. It is that fragile.

Mineralized area near Eagle on Native Corporation Land. Rumor is that there is legal access through Yukon Charlie National Preserve and that a road will be built but no evidence of this in the record. No easement here on the map.

Ensure access across public land to private land for mineral or other development through right-of-way or other appropriate authority.

## B.12. Lands and Realty

Will the RMP look at local energy sources and renewable energy? Proposal in Tok area to get a grant from the State to look at use of biomass for energy generation
<b>Withdrawals</b>
BLM must resolve the land status issues and open lands currently closed to mineral and energy resource exploration and development. This can best be accomplished by working to revoke the withdrawal orders issued under Section (d)(1) of ANSCA, where many areas of these lands are covered by State and Native selections and evaluating all areas now closed to mineral entry for removal of the closures.
The Plan must place a high priority on removal of the numerous Outdated Federal Withdrawals. Some of these are under Section (d)(1) of ANSCA and others are based on other actions. Many withdrawals exist because there has not been a venue to remove them. This planning process now provides that venue .
The Plan should include general intent language regarding removal of Outdated Withdrawals and specific proposals to open the land and return it to pre-withdrawal multiple use land designations.
BLM should comply with the conclusions of the previous Steese NCA Plan and Final EIS and open the lands to mineral entry. According to the Proposed RMP/Final EIS for the Steese NCA dated November 2, 1984, 917,000 acres of the 1,220,000 acres in the Steese NCA would be opened to mineral entry. This was never done even though that decision was made almost 14 years ago. This area should now be opened. The Record of Decision and Resource Management Plan (ROD/RMP) for the SCNA dated February 6, 1986 states that the Semi - Primitive Motorized Management Unit in the Steese NCA (as defined in the ROD/RMP) would be... "opened to entry under the 1872 Mining Law. It will also be opened to oil and gas leasing..." This would include approximately 30% of the total area in the Steese NCA and corresponds with the Semi-primitive area defined in the Proposed RMP. Significant mineral studies were completed in the Steese NCA in 1987, 1988 and 1989, through special congressional appropriations, by a combined effort of the USGS, State of Alaska Division of Geological and Geophysical Surveys, and the U.S. Bureau of Mines. These studies reaffirmed that significant mineral resources exist in the Steese NCA and that there is also significant potential for new discoveries. Secondly, the Record of Decision for the Steese NCA (pg.23) states that the Semi-Primitive Motorized "Special Management" unit in the Steese NCA (as defined in the ROD/RMP) "will be opened under the 1872 Mining Law and to oil and gas leasing.. .." As proposed in the plan but never carried out, it is now time to: 1) open the Semi-Primitive Motorized Unit and 2) evaluate and open the Semi-primitive Motorized Special Management Unit. ANILCA Sec. 401(a) clearly states that multiple use management should be sought for this area. Reopening selected portions of the Steese NCA to mineral entry will help to achieve the original intent of Congress.
The draft plan should provide a thorough analysis of the various "D-1" lands in the planning area and identify environmental impacts that would likely occur if this classification withdrawal were lifted or modified. Such analysis should include potential impacts to subsistence, wildlife, fisheries, watersheds and the goals and purposes of neighboring conservation units.
We've talked a little bit about the d-1 withdrawals and the possibility of changing some. For any of those kinds of changes, we would like to see analysis done of the impacts and either it be addressed in the plan or in some other fashion before the withdrawals are altered, that it be evaluated and dealt rather than just changing without public involvement.

In the BLM 1980 Fortymile Management Framework plan it states; "By 1985, all public land, which has been withdrawn by PLO 5250, and has not been recommended to Congress, should be restored to public land, open to mineral entry." It is now 2008 and virtually none of the land withdrawn under PLO 5250 in the Fortymile has been "restored to public land, open to mineral entry" even though the purpose of PLO 5250 has been satisfied. The new RMP should include a lifting of those PLO's directly affecting the Fortymile basin.
D1 acreage closed to mineral entry awaiting designation must be reopened to promote a more active mining community. In accordance with the Fortymile Management Framework Plan of 1980, Lands Objective 3, Minerals Objective 3, and Minerals Decisions M 3.1. The areas not otherwise designated should have reopened to mineral entry by 1990.
We are extremely concerned that there is really no cumulative analysis impacts to the decision that is being made [regarding withdrawal revocation]. Recommendations for revoking withdrawals should be done on a really case-by-case basis with the specific cumulative impacts analysis of how that would affect surrounding lands, communities, wildlife. What we have seen in a lot of the other planning areas is this sort of blanket approach and a recommendation to lift all of the withdrawals. I understand that there are areas where development will happen and there is areas where development can happen but unless you have a real cumulative analysis, it will be hard to determine. Especially for lands that have been closed to mineral entry for nearly forty years.
As much of those [d(1) withdrawals] that could be opened as possible would be good.
I recommend an in depth, case-by-case analysis of each area that is going to have its d-1 withdrawn or changed as opposed to blanket rules and regulations: Each one a case-by-case analysis to be done. Information given to us about how it is to be done. Facts and predictions about what the impact of the new activities that are going to be there, that are going to affect us and that are going to happen to the land.
I too think that on the d-1 areas that there should be specific analysis on those on a case-by-case basis.
It is my feeling that the 816 acre BLM recreational withdrawal adjacent to the city of Eagle should remain as it is and not be considered to be turned over to the State of Alaska. There is a great deal of recreation that takes place on this land's trails, creeks, and grounds.
All federal withdrawals including Public Land Orders, secretarial orders, congressional acts, etc. should be identified on the maps and the purpose of each should be included in the plan. Those withdrawals for which the defined purpose of the withdrawal no longer exists should be highlighted.
The State requests that BLM review and recommend revocation of withdrawals made under ANCSA that were intended to be temporary in nature for Native land selections but were not, or are no longer selected by corporations; and withdrawals that were made under ANCSA, including ANCSA Section 17(d)(1), for study as potential federal conservation areas, but which were not subsequently designated under ANILCA.
BLM should retain the recreational withdrawal in Eagle because much of the area is of historic value as it was part of Fort Egbert, the water system from American Creek to Fort Egbert, the hospital ruins, and the shooting range are all within the lands in question.
BLM should retain the recreational withdrawal in Eagle because Many campers in Eagle Campground have voiced their praise of BLM campgrounds for being clean and well maintained. Some have also said they aren't impressed with the State campgrounds. I would like BLM to continue providing a positive experience for visitors to this area.
<b>Land Conveyance</b>

<p>BLM must resolve the land status issues and open lands currently closed to mineral and energy resource exploration and development (claim staking, leasing, sales, etc.). This can best be accomplished by expeditiously clearing land title by finalizing transfer of lands to the State and Native corporations.</p>
<p>All State and Native selections should be identified in the plan and shown on the maps. It is important that everyone reviewing the plan know that these selected lands will, in all likelihood, become State or Native lands at some point in the future .</p>
<p>Many of the non-federal parcels in the planning area are state owned, tentatively approved or selected. While land status in this area is more stable with fewer selected lands than in other BLM planning areas, striving for a seamless management transition upon conveyance of state-selected land and consistency in management across ownership boundaries continues to be in the public interest.</p>
<p>The State requests that prior to conveyance, BLM management intent for selected parcels be as consistent as possible with state management intent. Under ANILCA 906(k), the State must concur with authorizations on state-selected lands. State concurrence is based on DNR plans as well as other state policies, regulations, and statutes that address selected parcels. While BLM retains management responsibility for selected lands prior to conveyance, we request that the State of Alaska be contacted, and our views considered, prior to implementing a more specific management program or issuing a permit involving these lands. In addition, we understand that fees collected for special use or right-of-way permits will be held in escrow until the selected lands are conveyed or relinquished, consistent with ANILCA Sec. 906(k)(2).</p>
<p>When will Doyon's selection priorities be determined (Due June 10, 2008) and how soon and where can the public access this information?</p>
<p>How quickly will the land be conveyed? Once these June 10 priorities are conveyed, will the process be finished?</p>
<p>How much BLM land will be left around Tok for public use?</p>
<p><b>Natural Gas Pipeline</b></p>
<p>In planning for uses along the Alaska Highway, I request full consideration be given to designating a corridor that would allow future energy transmission needs to be met. I would allow for electric, oil and gas pipelines, and the lands and resources that might be needed to support these, such as mineral materials and ancillary construction lands.</p>
<p>If the timing of the RMP decisions is determined to be incompatible with expeditious authorization of a gas pipeline project, I would request that consideration be given to delay or postponement of the RMP.</p>
<p>The Plan must focus especially on the pipeline corridor for removal of outdated withdrawals. Lands needed for the gas pipeline must be retained and sufficient closure width must be retained so as not to restrict gas pipeline construction. However, the current width is often five or more miles wide and one or two miles should be sufficient. When the right of way was established, it was not known where TAPS would be sited and the added width was necessary. That is not the case for the gas line. Also, in areas where a second complete alternative right of way was contemplated but not used for TAPS, that area should be opened in its entirety . This planning process now provides the venue to take this action.</p>
<p><b>Navigability</b></p>
<p>All navigable waters should be defined in the plan per the Gulkana decision and so identified on the plan maps.</p>

<p>Other sections [of the Fortymile River] maybe also should be addressed for navigability. You mentioned something yourself about how they're looking at the history and whether or not it's been used as a road of commerce, right, with the rivers. We think the Mosquito Fork needs to be looked at again for navigability determination.</p>
<p>The Equal Footing Doctrine, the Submerged Lands Act of 1953, and the Alaska Statehood Act of 1958 granted lands beneath tidelands and inland navigable waters to the State of Alaska. If water bodies, both inland and marine, were reserved or withdrawn by the federal government prior to statehood on January 3, 1959, lands beneath these waters may have been retained by the United States. Within this framework, if a water body is navigable, the bed of the water body belongs to the State of Alaska. If a water body is not navigable, the bed of the water body belongs to the adjacent landowner(s). Determination of what waters are navigable or non-navigable is an on-going process in Alaska at both the administrative and judicial levels.</p>
<p>The State of Alaska considers any waterway that can be utilized by a traditional native skin boat or other small boat capable of trade and commerce to be navigable. The Kandik and Nation rivers have been determined navigable by the 9th Circuit Court, and any river with equivalent or better physical characteristics is assumed to be susceptible to navigation at this time. To date, Recordable Disclaimers of Interest have been issued for the Porcupine River upstream to the Canadian border (May 9, 2005) and for the Black River upstream to its confluence with the Grayling Fork (October 24, 2003).</p>
<p>The State requests that BLM work with the State on specific water bodies to resolve issues concerning use of rivers, lakes, and streams within BLM-owned lands where management conflicts arise. Cooperative management agreements between the BLM, the State of Alaska, and other landowners may be developed when needed for specific waterways within the planning area. In situations where navigability and the ownership of submerged lands are disputed for a specific water body, the final navigability determination authority rests with the federal courts.</p>
<p>The State requests that the plan reference Section 103 (c) of ANILCA and be clear that BLM management of submerged lands and shorelands is only applicable to the beds of non-navigable federally-owned water bodies within the planning area. Ownership and management of lands below the ordinary high water mark of all navigable water bodies (not reserved prior to Statehood) transferred to the State at the time of Statehood. Clearly describing applicable management authorities in the planning area will help the public understand where proposed management prescriptions are intended to apply.</p>
<p>Sections of the river system, Mosquito Fork between Engle Creek and Chicken Creek in particular, have no official designation. This river section needs to be recognized by the BLM as "navigable". Included is a copy of a letter from Fred 'Whitehead addressing navigability of the Mosquito Fork.</p>
<p>Other river sections [Fortymile River] may also need reconsideration for navigability considering historical and current uses.</p>
<p>The navigability of the Mosquito Fork river from Chicken to Mitchell's Ranch needs to be readdressed. I believe there is sufficient data to support this stretch being navigable. When the WamCats line was put in the route followed from Tanana Crossing (Tanacross) to Mansfield Lake, to Mitchell's Ranch and down the Mosquito Fork. This was an important route into the Fortymile used by miners, trappers, residents of Kechumstuk and Mitchell's Ranch. In the Federal criteria for determining navigability it states that the use of a water way for travel in the winter months can not be the sole criteria for determining navigability, but such use must be considered.</p>
<p><b>General Lands and Realty Comments</b></p>

<p>BLM must resolve the land status issues and open lands currently closed to mineral and energy resource exploration and development. This can best be accomplished by expeditiously clearing land title by arranging for sale, disposals and exchanges of the many scattered and often isolated small parcels of land.</p>
<p>We request that all proposed rights-of-way be considered on a case-by-case basis over the life of the plan, rather than prejudged upon plan approval. If any Right-of-Way Avoidance Areas are proposed, BLM should make certain that the terms and conditions associated with those corridors are consistent with Title XI of ANILCA. ANILCA Section 1101 recognized that Alaska's transportation and utility network was largely undeveloped and included a standard process for consideration of transportation and utility corridor proposals that applies to conservation system units, national recreation areas and national conservation areas per Section 1102(4)(A).</p>
<p>The State requests that BLM recognize the pressing need to provide for the efficient development of utility corridors, including corridors for the transport of oil and gas and other mineral resources, as well as transportation corridors to support continued economic growth both at the state and local levels.</p>
<p>The State asks that all federal withdrawals be identified and mapped, and the purpose for each withdrawal be noted either in annotation or the map legend. The RMP/EIS planning effort presents an appropriate opportunity for BLM to review all Public Land Orders (PLOs) and withdrawals and remove those where the intended purposes are no longer present.</p>
<p>State land sales are generally directed toward areas identified in area plans for "Settlement." The State has several types of disposal programs. At present, two programs are utilized. The first makes state land available for sale through auction and then, if not sold, parcels become available over-the-counter for public purchase by Alaska residents. Remote recreational cabin sites are also available through a staking program.</p>
<p>Please note that in contrast to BLM policy, the State does not consider trapping a "commercially oriented activity." Trapping is categorized as a regulated method of taking wildlife and not as a subsistence or commercial activity. Therefore trapping facilities should not be required to meet the terms of a commercial cabin, i.e., acquisition of a lease under FLPMA at fair market value. During deliberations regarding trapping on national park lands under ANILCA, Congress concluded that trapping is not a commercial activity unless: "...the trapping itself becomes a business with employees paid to support the trapping operation." (Senate Report 96-413) We request that BLM discussions and decisions within the scope of the RMP relative to trapping reflect this legislative history. Please review the attached letter from ADF&amp;G to the State Director of BLM for further description.</p>
<p>Many of the maps don't show Native allotments – all of the allotments that are out there and how can community members give you that information and get those on the maps because People are confused when they look at the maps and they're not seeing allotments that exist. So it would be helpful for people to know how to get that information to you.</p>
<p>How could the Chalkyitsik Tribal Council acquire this land from BLM? And get you out of our headwaters, make us a loan, we'll buy it from you, give us a few years, we'll pay it back. Maybe we'll find a grant from BLM that will help us buy land from BLM, help us buy our own land back. Now I mean, there's ways. Money talks a really loud voice so what do we do? I don't know. I don't believe that you have the answers for us here. I believe that you're here to take our comments back and I pray that you guys act on these. Please. It's disheartening. It really is. I have sat in this hall time and again and watched different agencies come in here and say, we're going to do this to your land but you can give us comments against it or for it but we're going to do this to your land.</p>

It would be nice if there would be a provision for very low impact, meaning you have just like a trapping cabin or something and you wouldn't have to do it illegally because people do it anyway if they really need it. Or if they really need it, they'll do it and you could go to the proper authorities and get a permit of some sorts because it was possible with the State. I don't know whether it still is and what exactly it was but I know you could like lease or something like this and make a deal that they could have a cabin there [on BLM land].

In essence, subsistence is commercial because you can put a commercial value on fish, wildlife and anything else that subsistence people do. State studies have shown that fish and wildlife has a tremendous economic value. Part of the problem in this state is that so much emphasis is being put on commercial development and it's very restrictive on private access as far as a person wanting to just go out and live with the land. So you're promoting something which in the long-term, through commercial activities, is going to be a more detrimental to the land as far as vegetation or wildlife or access, new roads. New roads and trails bring more people in, more people bring more problems and there's very little emphasis being put on subsistence lifestyles and making that easier for people to go out there and try to do that. When you consider what the requirements are going to be for permitting under ANILCA, subsistence has top priority in all aspects. But, it's just not happening that way. ANILCA is a great document and was set up very well to protect subsistence lifestyle and rural use. But it's not being enforced and a lot of the activities that are going on out there are promoting heavy commercialized activities which is a direct conflict with subsistence lifestyles. Some more creative thought needs to be put in [on how to] allow private individuals to get limited permits. Maybe a five-year or a 10-year permit for living in the area, that includes trapping and hunting. You can limit those [permits] so you would only allow a person every 20 or 30 miles on a river drainage so you don't have to worry about conflicts with creating little communities. If people want to go out and try and eke a living with the land out there, they would have the opportunity to do that. That opportunity is going away really fast in Alaska. Between Federal, Native, and BLM lands, there's no land left for people that just want to go out and live with the land. Some people do it for a few years, others do it for the rest of their life. But, that opportunity even to try that lifestyle out is quickly disappearing. That is a big part of what Alaska is all about in most people's minds. I think whether that goes into the subsistence aspect of your plan, there needs to be more emphasis in my mind put on that.

If such a thing happens that one can get a permit for a trapping cabin or anything like this, I think it's very important to have certain rules go with it because I wouldn't like to see a bunch of places spring up here and there and all kinds of things happening on those sites. Because it should be low-impact and there should be regulations with that otherwise you have no control of what's happening. There used to be places where you could stay overnight. I'm not at all opposed to that. I think that's very good because that makes it possible for people to move around in the countryside. But, I would hate to see a commercial aspect or a development aspect on that. It should be low-key for subsistence use.

There is a range of permits that ought to be possible to achieve and some of the permits should allow people to try and live on the land. Give them a two or a five-acre piece of land or a one-acre piece of land just to put a cabin on, permit them for 10 to 20 years and require that they live on that land for more than six months out of the year. That keeps small commercial enterprises and commercialized hunting and trapping operations and things like that out of the picture. Permits that would allow people to live there.

<p>We need permits for travel cabins. Up until 20 years ago there were a lot of cabins in this country that were used regularly by people for traveling. They are and gone now and they can't be replaced. We can't build them in the [Yukon Charlie Rivers] Preserve. You can work with Doyon. But because the lands haven't been selected up to this point they were pretty insecure about granting permits for those types of travel cabins. Most of us travel more in the winter than in the summers and so winter travel and winter accommodations camps or cabins are essential to moving around in this countryside.</p>
<p>It's important that any sort of permitting process that you put in place be efficient and streamlined to the point where if a person is applying for a permit, let's say it's a permit for a trapping cabin or a travel cabin, it doesn't take five years to get it. People being able to get their families out on the land doing subsistence and doing some of these activities as a family. You only have your kids for so long and they grow up and move on so it needs to be quick. You need to be able to apply for a permit and get your cabin.</p>
<p>Most people aren't into wanting to own a bunch of land. Sometimes you're forced to buy it because that's the only way you can do it but most people aren't into owning land. In Canada they actually have a pretty good set up over there on the Crown land where you can get a 100-year lease. We've got friends over in the Yukon Territory where their government goes out of the way to help them get set up out there for trapping or whatever. It's really pretty amazing and they're quite helpful to their people over there when they go out into the woods. We've got friends across the border there and they [Canada] have got a pretty nice way of dealing with it.</p>
<p>One of the things that happens in this area and it probably happens in other communities in Alaska, is when people have common interests to get out in the woods, they band together and work together to build the cabins. It's not always that one person just goes out and does it. It's a group of people and it's almost a cooperative experience between the people that have an interest in traveling or accessing that part of the land So it's not like you're trying to give a permit to one person for ownership of one cabin. It's basically creating almost like a public use cabin and people are willing to go out and put the cabin up and do the work to do it so economically it's very feasible to do it. It doesn't cost the state or the government any money. You just have to allow permits so that they can obtain the raw materials for the cabins which are usually right on site.</p>
<p>We lost a lot of our cabins because they've been burned with these fires and most everybody in this room has sled dogs or they have snow machines and they got kids it's just a way to get them out, you know, it's healthy, it's real healthy.</p>
<p>The map should show in detail, the land ownership. There is village corporation lands, there is some tribal lands. There is Regional Corporation lands. There are lands that are double selected between the State and Native Corporation lands. It is helpful for people to see those conflicts to help think about what might happen in the future. They are not all the same.</p>
<p>Will there be any provisions for school lands in the RMP? BLM needs to consider school lands in conveyances. Sections 16 and 36 of each township were designated by the federal government to be set aside for school purposes. State was in litigation over school trust lands a few years ago. Some of it was consolidated to the coal land down by Healy.</p>

## B.13. Doyon Exchange Comments

<p>FWS Land Exchange with Doyon: I am concerned about the potential impact on the [White Mountains] recreation area and its wilderness quality. I am concerned not just for myself but for BLM since this area is a jewel of the BLM system and should not be compromised.</p>
<p>With the current EIS that has been submitted by Doyon and FWS, they would like to put a road through the area of the White Mountains there. Preferably down a creek called Victoria Creek. Now this Beaver Creek still runs clean versus Birch Creek runs polluted. I would like to see the BLM not allow that road to go through because of the ecosystem. Dall sheep and caribou to cross that creek repeatedly. I think that if anything by them putting a road down that creek, the ecosystem would be impaired upon and the enjoyment of the public would be infringed upon.</p>
<p>If Doyon-USFWS land exchange in Yukon Flats gets through, I would hope any access road could be kept out of the White Mountains Recreation Area.</p>
<p>Opposition to a Right of Way through the White Mountains National Recreation Area to provide access for proposed oil and gas development in the nearby Yukon Flats National Wildlife Refuge.</p>
<p>The White Mountains NRA must be protected from a Right of Way to the proposed Doyon development to ensure lasting recreational opportunities and protect the recognized wilderness values of the lands and rivers.</p>
<p>I am writing in opposition to the proposed Right of Way (ROW) through the White Mountains NRA. The United States should use our mind trust and resources to develop and sustain land use policies with the long view. That long view should balance our economic interests with good stewardship to the plant; these are not mutually exclusive ideas.</p>
<p>The plan should not preclude any transportation routes especially in light of the proposed land exchange between Doyon, Ltd. and the Yukon Flats Refuge, which may lead to the need for new corridor development in the White Mountains National Recreation Area.</p>
<p>The BLM and US Fish and Wildlife Service are in the process of conducting prejudiced NEPA procedures. Decisions for the Yukon Flats Land Exchange and the White Mountains Right of Way were made before the scoping of the Proposed Land Exchange Yukon Flats National Wildlife Refuge EIS ever began and long before the Eastern Interior scoping process began. The closed door meetings with the Doyon Corporation resulted in an Agreement in Principle, in this case known as the Proposed Action and cited simultaneously as such within the Executive Summary of the Proposed Land Exchange Yukon Flats National Wildlife Refuge DEIS at ES-2. The decision reached with Doyon and USFWS came in late 2004 prior to scoping, which did not begin until nearly a year later on October 19, 2005. DEIS at 1-13. NEPA must be completed prior to the decision. (40 CFR 1508.23)</p>
<p>The alternatives that are formed for the Eastern Interior RMP may, like the USFWS, be in violation of NEPA because the alternatives may not be formulated with their potential for adoption as required but instead for the agency to retrofit the process to meet the requirements of NEPA. As a result the BLM will have failed to meet the range of alternatives requirements because the methods used to derive the alternatives will not be adequate. When presenting and prioritizing the alternatives the agency must articulate why it has exercised its discretion in a particular way and provide an adequate explanation for its action. Mere conclusory statements are not enough. Motor Vehicles Mfrs. Ass'n v. State Farm Mutual Autos Ins. Co., 463 U.S. at 48-49, 103 S.Ct. at 2869-70; International Fabricare Inst. V. EPA, 972 F.2d 384, 389, 392 (D.C. Cir. 1992)</p>

The BLM is in danger of violating NEPA by putting the decision before the process. This fatal flaw of the EIS precludes any real public involvement and undermines the spirit of NEPA. The BLM should put the ROW under 'alternatives considered but not analyzed in detail' with explanation that the ROW is inconsistent with primitive and WSR management and would prejudice the process as decisions were made before the NEPA review, therefore eliminating the proposal from serious consideration.

The US FWS and BLM should be completing environmental impacts statements for the proposed development and potential ROW simultaneously instead of sequentially. Completing the NEPA process for the land exchange before impacts on WMNRA are reviewed is illegal and violates NEPA. Doing so creates a pro forma EIS where the agency has prejudiced the decision. *International Snowmobile Manufacturers Association v. Norton*, 340 F.Supp.2d 1249, 1260-61 (D. Wyo. 2004). Making decisions for development within the Land Exchange EIS without reviewing the impacts to the White Mountains RNA makes the public process mute and irrelevant.

The BLM has yet to review the development [Doyon ROW] for consistency within the WMNRA, while decisions have already been made. Accommodating the decisions made for the Yukon Flats before the RMP for White Mountains will result in uninformed decision making that is contrary to the requirements of NEPA. The National Environmental Policy Act serves the purpose to inform both the public and the government of the impacts of federal actions. The Land Exchange and the White Mountains Revision are connected actions. The proposed road to the Doyon development can not be reviewed for impacts after a decision to develop is made. These connected actions must be reviewed within the same EIS or at the very least simultaneously. To not do so then places the decision before the White Mountains public process and is therefore a violation of NEPA. *Western Watersheds Project v. Bennett*, 392 F.Supp.2d 1217, 1225 (D. Idaho 2005), *Thomas v. Peterson*, 735 F.2d 754 (9th Cir. 1985), *Soda Mountain Wilderness Council v. Norton*, 424 F.Supp.2d 1241, 1266-67 (E.D. Cal. 2006). No provision of NEPA allows the USFWS or any federal agency to eliminate a possible environmental consequence from analysis. *Limerick Ecology Action, Inc. v. NRC*, 869 F.2d 719, 754 (9th Cir. 1989). The risk to the White Mountains RNA primitive and semi-primitive areas are not insignificant and thus requires that a "hard look" be taken. The violations of BLM can be avoided by removing the ROW from consideration within the Eastern Interior RMP.

This development [Doyon ROW] violates the management goals for the Beaver Creek National WR and the White Mountains NRA. The designated NWSR corridor will be managed as a VRM Class I area. The Objective of this class is to preserve the existing character of the landscape so that it appears unaltered by man. The level of change to the landscape should be extremely low because only very limited management activities should occur. White Mountains NRA ROD, 28. Primary emphasis shall be given to protecting its aesthetic, scenic, historic, archeological, and scientific features. Wild and Scenic Rivers Act section 10(a). To reverse the hard work and time that went into protecting these places for short term, damaging development is unacceptable. The BLM must thoroughly examine the direction that is being proposed and the implications that the actions have on the surrounding areas. Alaska Wilderness believes that taking a hard look will result in findings that support our conclusions that this development is not compatible in these areas and the ROW should not be granted.

Doyon and Refuge came up here and they did their selection around our area and our village [Chalkyitsik] and our land and they did all this selection and they said, okay here you go and they came to us as a corporation board member over here, and they said okay here's what the Refuge has selected in the land trade for oil development down there. Then they came to us and said okay, now make your selection but you can't touch any of this because it's already selected.

I strongly support the protection of the Victoria Creek area [potential site for Doyon right-of-way], keeping that a pristine area

The potential ROW to the proposed land exchange and future oil and gas development in the Yukon Flats National Wildlife Refuge is inconsistent with the management of the White Mountains NRA and the Beaver Creek National WR. Our organizations are opposed to the land trade, the oil and gas development, and the ROW proposal.

## B.14. Wild and Scenic Rivers (WSR)

40 Mile National Wild and Scenic (NWSR) Corridor is deserving of continued protections and should be managed for its outstanding river values. The number one priority should be the protection of the river corridor to prevent degradation from the short term mineral interest of suction gold mining. These dredge operations may be decreasing water quality by increasing metal and turbidity levels in the water system.

The 1982 management plan for the Fortymile NWSR contains inconsistent management. Mineral and access development is openly welcome and planned for despite the known consequences on the river and surrounding environment. Turbidity has increased substantially on several tributaries of the Fortymile as a result of placer gold mining effluent. (Fortymile River Management Plan at 35) Contamination of the river waters by sewage poses a health hazard for all who use these waters (Fortymile River Management Plan at 36). The BLM proposed two actions to improve water quality: monitoring sewage and grey water disposal and requiring placer mine plans of operation to include measures to achieve established water quality standards – though this was expected to be unachievable and presumably ultimately un-enforced (Fortymile River Management Plan at 47).

The focus on the Fortymile area really should be on the exceptional river values that exist there. My concern is that it has started to shift a lot over the years to mining and we know that there is a lot of [mining] activity there. But the focus should be on the exceptional river values.

We support the continued strong management of the Fortymile Wild and Scenic River for its wild values and encourage you to continue to work things out with the State so that we don't have incompatible activities happening that may harm the water quality.

The Beaver Creek stream drainage should be protected from hard rock mining from its headwaters to its confluence with the Yukon River. Hard rock mining contaminates the water and causes water pollution problems similar to those currently found in Birch Creek. Existing miners and mining claims should be respected. However, no additional claims should be recorded or permitted.

Water quality, quantity and the physical condition of the stream bottom are important features for fish habitat. Water quality on Beaver has been greatly disturbed by placer mining resulting in high levels of turbidity, visible up to 50 miles downstream (BLM WMNRA RMP, 1984). The Nome Creek has been under restoration efforts for nearly 20 years because of the vast amount of disturbance the river has seen – 7 miles of stream bed completely destroyed as a result of mineral development. The difficulty of reclamation has prolonged efforts and reclamation is predicted to continue for several more years (Kostohrys, 2007). During the Fish and Wildlife Service's Biotic Assessment of the Beaver Creek Watershed the highest mercury contents within the watershed were found in the fish sampled from Beaver Creek, compared to tributaries. The recommended levels of mercury for safe consumption are 1 ppm, established by the Food and Drug Administration: the levels of the fish sampled in the Birch were 2 to 7 times higher than the recommended level. (Bertram and Pearson, 2005)

Birch Creek National Wild and Scenic River is plagued with pollution from placer mining operations that leave a lasting impact on water quality the entire length of the Birch. (Birch Creek River Management Plan, 1983) The degradation of the values for which a river was designated under the National Wild and Scenic Rivers Act is prohibited under section 10(a) of the Act. Gold is the most valuable mineral in the NCA and with increases in the market value of gold there is an expected increase in the operation of existing valid claims. With increased mining operations should be more stringent regulations to ensure that water quality and the aquatic system are not adversely impacted.

With regard to the proposed Eastern Interior plan, our most fundamental concern is for protection and proper stewardship of the National Wild Rivers: Beaver Creek, Birch Creek and the Forty-Mile Wild Rivers. In places within these conservation units where the wild values have been compromised by inappropriate stewardship or public use under previous management plans, we urge that the proposed plan address such issues in an effective manner which will restore wild values at least to the level that existed in 1980 when the units were established.

The planning area contains three designated rivers, the Beaver Creek Wild River, the Birch Creek Wild River and the Fortymile Wild and Scenic River. Any additional Wild and Scenic River assessment done for the Eastern Interior plan must consider the potential land ownership pattern following completion of the state and native conveyances, since highly fragmented land ownership does not lend itself to wild and scenic river corridor management. It is also unlikely the State would concur with a federal determination that any rivers in the planning area are suitable for Wild and Scenic River designation.

The current management of Wild and Scenic Rivers in the planning area are inconsistent with the original intention of the designation and goals of the National Wild and Scenic Rivers Act. According to the 1980's management plans for all three of the WSRs; the Birch, the Fortymile and the Beaver, each river has a history of pollution from mining and development. Despite congressional designations, BLM has not afforded the necessary protections to the Wild and Scenic Rivers within the Eastern Interior planning area.

Goal 1: Continue reclamation activities of historic and current damages from development and mining. Goal 2: Prevention of further damages to WSRs by prohibiting stream diversion and enforcing reclamation standards for all existing mineral operations and future mineral. The cost of reclamation should not be passed on to tax payers, as it has been in the Nome clean up, but instead from those who disturbed the national and local resource – owners and operators of mining claims. Goal 3: In order to maintain the values for which the river was designated BLM must more strictly manage placer mining and water quality standards. Goal 4: The Beaver Creeks serves as a drinking water source for Birch Creek Village. The River should be managed for drinking water quality. As advised in the 1984 management plan, placer mines should 'be required to meet a zero percent downstream discharge in order to meet the clear (and/or drinking) water standard set' for the streams. Goal 5: Water quality standards for all three WSR must be consistent with efforts to restore salmon populations on the Yukon River and its tributaries.

The other area that I want to complement [BLM] on is the Fortymile River Corridor I know that it has been difficult to implement management there, particularly the wild and scenic corridors. Almost, I don't want to say in conflict, but the issue of dealing with mining. The miners were there before BLM got there. And so it has be been a real balancing act and things could have gone a lot worse than they have.

## B.15. Special Designations

<b>Areas of Critical Environmental Concern and Research Natural Areas</b>
Current management of the Research Natural Areas (RNAs) in the Steese National Conservation Area and the White Mountains National Recreation Area should be maintained. Keeping these special areas closed to mineral development is a high priority. BLM's Land Use Handbook requires that ACECs must be protected to prevent irreparable damage to resources.
ACECs need to be an adequate size to protect the integrity of the system. During the 1980's management plans, larger areas than ultimately designated were proposed for RNAs. The success of management related to the size of these areas must be reviewed to determine if the originally proposed larger area is necessary.
We recommend the following expansion: Big Windy Hot Springs RNA, in the Steese NCA, is a very small area, 160 acres, and is susceptible to disturbances outside of its boundaries. The 1984 Steese RMP recommended the acreage for the RNA be anywhere from 4,400 acres to 12,733 acres. (Juday, 1998) The Eastern Interior RMP should expand the acreage of the RNA to ensure that the values for which it was designated are not degraded. The surrounding area should remain semi-primitive to prevent proliferation of undesignated trails and damaging impacts to the surrounding vegetation.
We recommend the following expansion: Mount Prindle, shared between the Steese NCA and the White Mountains RNA, and a considerably larger area (47,000 acres) was nominated and reviewed for inclusion in the National Natural Landmarks Program (NNLP), under the National Parks Service in the late 1970's. (Juday, 1988) This area still retains the values for which it was reviewed and the RNA boundary should be expanded to ensure proper protections for the values of the area.
We recommend the following expansion: The spine of the White Mountains, an area of 180,000 acres that includes the Limestone Jags RNA, was nominated for inclusion in the National Natural Landmarks Program. (WMNRA PRMP/FEIS, 1984) The current Limestone Jags RNA is 5,170 acres and features: caves, underground streams, natural bridges or arches, and emergent cold springs which are rare at such high latitudes. The area is important seasonal habitat for Dall sheep and the White Mountains Caribou Herd and has scientific significance. (Juday, 1989)
I am proposing that the watershed of the Salmon Fork of the Black River be studied for designation as an ACEC. If not that, then a natural research area at the very least. I understand that currently talk of wilderness designation is off the table but things can change. I think we would be well served if we think about protecting that watershed. Perhaps there is a time and eventually we may be able to consider wilderness designation for that area. In the meantime, I think it is very important that we protect that area for fish, wildlife habitat and subsistence uses. But I want to summarize that it includes the wintering grounds of the porcupine caribou herd. It has a healthy furbearer population, very healthy moose population and very healthy bear population and a lot of that is dependant upon the health of the stream itself.

<p>Alaska Wilderness League recommends the Upper Black River for designation as an ACEC. Rational: The BLM study, Aquatic Resources of the Salmon Fork Black River, Alaska, states that: Given the high quality and diversity of this ecosystem, the areas of critical spawning and rearing habitat for anadromous and resident fish populations, and the high potential for future recreational and subsistence use, we should consider giving parts or all of the area a special land designation, such as naming it an Area of Critical Environmental Concern...Under 43 CFR 1610.7 – 2(a), the Black River meets both the relevance and importance criteria: (1) Relevant – The area is a significant historic, cultural, and scenic value as wells as a fish or wildlife resource. The area is a source of subsistence as well as a clean household (municipal) water resource for the village of Chalkyitsik. Historic Old Salmon Village is located along the banks of the Upper Black River. According to BLM’s study the area is critical spawning and rearing habitat for anadromous and resident fish. (2) Important - The above values have substantial significance. The area is critically important locally but also has more than local significance and special worth. The area is an important vestige of Alaskan and Native culture. According to BLM the area has potential for recreational value – the remoteness of the area makes this of state or national significance. The Black River is a tributary to the internationally significant Yukon River and the spawning ground is an important contribution to the success of the Yukon’s commercial, sport and subsistence fishery. Goal: Designate the Upper Black River as an ACEC with the strongest protections to ensure sustainability of the resource and it’s historic and current uses.</p>
<p>We have talked about the quality of resources report that BLM actually did back in the 1980’s and, you know, in reading that report, one of the things that really struck me in the last paragraph of that report is that BLM had recommended in the 1980’s that the Black River be considered an area of critical environmental concern and I hope that you’ll take that same consideration and make that same recommendation. And I guess I would ask you and I know it’s early on in the process and decisions haven’t been made but at this point, you know, is there consideration based off that report to designate that Black River as an ACEC? I’m sorry, I said Black River but it was the study on Salmon Fork but it was a BLM study, it was done in the 80’s and in part of that study it did make that recommendation and so I guess my request is that you’ll take a real hard look again at that report and in your other findings and hopefully make that same recommendation.</p>
<p>We understand BLM unencumbered lands in the planning area are generally not considered valuable for preservation of large untouched ecosystems due to selections by the State or native corporations, and lands of unique wildlife and scenic resources have already been placed under the administration of other federal agencies. Therefore we believe the RMP should not include any new proposed Areas of Critical Environmental Concern.</p>
<p>Goal 1: Identify the resources and support necessary to promote and maintain the wild, scenic and scientific qualities of ACECs. Goal 2: Identify (further) rehabilitation and reclamation needs within the ACECs. Goal 3: Develop management objectives that protect and enhance the resource values. This includes prohibiting activities that would degrade the qualities of current and potential designations. Goal 4: Determine if the expansion of existing ACECs is necessary to ensure protection of the natural environment and integrity of the local system. Goal 5: Review specified areas for potential inclusion in the National Natural Landmarks Program. Goal 6: Close all designated ACECs to mineral development to protect the values of the area.</p>
<p><b>General</b></p>
<p>The Steese National Conservation Area should have continued management to focus protection on wildlife and habitat.</p>
<p>What is the highest level of protection BLM will [or can] put on the Black River area?</p>

The 2,800 acre Mount Prindle RNA was designated by BLM for its uncommon bird and vegetation populations as well as important habitat for Alaska's caribou and Dall sheep. The area contains examples of both glaciated and un-glaciated alpine terrain and has high potential for education and scientific purposes. (Juday, 1988) Mount Prindle was reviewed in the 1980's for inclusion in the National Natural Landmarks Program, and was considered of local significance and a representative example of the geological and ecological features associated with the Yukon – Tanana Uplands (Young and Walters, 288-292). Alaska Wilderness League recommends that a new review be conducted to determine the potential inclusion of the Mount Prindle area into the National Natural Landmarks Program.

We are also very concerned that the wild qualities of the White Mountains National Recreation Area and the Steese National Conservation Area are preserved as well. In places within these conservation units where the wild values have been compromised by inappropriate stewardship or public use under previous management plans, we urge that the proposed plan address such issues in an effective manner which will restore wild values at least to the level that existed in 1980 when the units were established.

The plan must be developed in accordance with the provisions of the Alaska National Interest Lands Conservation Act (ANILCA, P.L. 96-487) which, among other things, established conservation system units (CSUs). Conservation system units within this planning area include the Yukon-Charley Rivers National Preserve, the Yukon Flats National Wildlife Refuge, the Tetlin National Wildlife Refuge, Beaver Creek and Birch Creek National Wild Rivers, and Fortymile National Wild and Scenic River. We request that BLM provide a definition for "conservation system units" and "public lands", as defined in ANILCA, as certain provisions only apply to these specifically defined areas. The White Mountains National Recreation Area and the Steese National Conservation Area are not CSUs, although some ANILCA provisions typically associated with CSUs also apply to these areas, specifically Section 1110(a) and (b).

We request that any actions taken to designate special management areas or otherwise manage these lands be coordinated with the State at all stages. This is of particular importance if proposed restrictions, such as seasonal closures or limits on visitor use days, affect state lands, waters, or authorities or if deviations from state plans, such as the Tanana Basin or Upper Yukon area plans, are considered.

Because special management designations have the potential to impose additional limitations or management strategies on public lands, these designated areas should be delineated judiciously in order to balance public use with the protection of public resources. Proposed additions should be for the same purposes, with special attention paid to both relevance and importance per 43 CFR 1610.7-2. We request that proposed designation, and /or additions, focus on the exact amount of land necessary to ensure the appropriate management status for specific resource management issues.

We encourage the BLM to consider Wilderness designation and National Wild and Scenic River Status as tools which can help wildlife populations adapt in a less disturbed environment during climate change while insuring subsistence access to needed resources.

No areas should be studied for further land management restrictions, including wilderness designation, wild & scenic rivers, etc. The ANILCA "no more" clause does not allow such studies. A Secretary's decision prohibits such studies unless the Alaska Congressional Delegation and the Governor agree and so request.

<b>Pinnell Mountain Trail</b>
I love the Pinnell Mountain trail and I was sobered to learn that it is right on the boundary of the Steese Recreation Area if not some of it on the outside. I encourage strong management to ensure that the values of that highly accessible and beautiful trail are maintained into the future. It may require either cooperative agreements or somewhat different management of that area that is between the trail and the road. Because it really is a popular place and so easy to get up into the high tundra country and that is kind of rare around here to get there that easily.

## B.16. Social and Economic

The BLM as a multiple use agency has a responsibility to encourage jobs related to development of mineral resources. The BLM must recognize the important role that minerals development can play in improving the economic well-being of residents in the planning area, Alaska, and the Nation.
BLM needs to recognize the affect their actions have on miners, recreation users, hunters and local businesses [in the Fortymile Area].
Commercial salmon harvests provide one of the only sources of income in many Yukon River villages. On the Yukon River, commercial salmon harvests have declined in recent years. In 2008, no directed commercial fishery was allowed for Chinook salmon. The 2007 commercial harvest of 33,629 Chinook was 30% below the recent 10-year average. The recent 10 year average includes several years when Chinook returns were declared disasters by state and federal agencies, and necessitating many millions of dollars of aid. As with subsistence fisheries, impacts to commercial salmon fisheries should be looked at on a riverwide basis, as any impacts to the salmon in the Eastern Interior region will be felt throughout the watershed. Impacts to commercial fisheries should be analyzed not on the basis of economic value alone, but on the role of these fisheries as sources of employment in the affected communities.
Healthy Yukon River salmon stocks are of vital importance to the primarily Native Alaskan communities who depend on salmon for their sustenance and their livelihoods. Harm to the salmon stocks because of increased mineral development and other changes is use places a disproportionately high burden on these communities because of the central importance of this resource to Native Alaskan communities. The BLM should analyze the disparate impacts placed on Alaska Native communities in the Yukon River as a result of changes to salmon populations, subsistence and commercial fisheries and access to subsistence resources.
The rapidly changing environment and way of life in rural villages is cause for concern. Environmental Impacts Statements ‘avoid any discussion of community health concerns: social ills (domestic violence, drug and alcohol use, suicide, criminality), mental health problems (depression, anxiety, stress), or issues dealing with dietary change and diabetes (because subsistence resources are less available).’ (Lessons Learned, 2008) Certain types of projects and land use changes can cause significant and long term human impacts. There is no statutory requirement for an HIA in NEPA but the integration of important information reflecting social and physical health could improve the process and increase understanding of long term impacts of land management. Dr. Wernham has identified various laws that support the inclusion of HIA. Such as NEPA Section 2 and 101, 40 CFR 1508, EO 12898, and EO 13045.
How come the BLM is making decisions without the input of Chalkyitsik? What I’d like to see on the board is a brown body. I mean, all of you are white and making all the decisions from the city. What do you know about Black River? I’d like to see someone seated in the decision-making that BLM has and don’t give me that bullshit that you guys don’t have enough money. You will wait 20 years for findings for Black River. We can do it without you guys. We’ve done without you guys a lot longer than you have been here. If anything else I think

the State is not being fair to the tribe. I don't know where you guys stand on sovereignty recognition but I don't see much activities going, you know, with tribes. When you guys talk about Black River you need to involve all the tribes.

## B.17. Planning Process

Chalkyitsik Tribal Council is requesting from BLM a seat at the table concerning every decision process concerning the entire Black River area.

At least one geologist from the USGS Alaska Science Center should be part of the planning team to assist in understanding the undiscovered mineral potential.

The EIS should disclose what efforts were taken to ensure effective public participation. If low income or people of color communities will be impacted by the proposed plan, the EIS should disclose what efforts were taken to meet environmental justice requirements consistent with EO 12898 (Federal Actions to Address Environmental Justice in Minority and Low-Income Populations). If applicable, we recommend that the BLM develop a strategy for effective public involvement of minority (e.g., Alaskan Native) and low-income populations in land management considerations, analyzing environmental, social, cultural and economic effects, and developing mitigation measures. Detailed guidance on addressing EO 12898 in NEPA documents is available from CEQ at <http://ceq.hss.doe.gov/nepa/regs/ej/justice.pdf>.

Maybe on the website, just give people kind of what a framework is of what BLM's guidelines is for comments. Because a lot of times, people comment on something that they are interested in. But in respect to BLM you get so many comments if it is really broad, there is not a real action that they can take to meet the comment. The more specific you can be with a solution to what your concern is, is helpful. But for the public I think it would be really helpful to know what those guidelines are. I actually went through and look at what those guidelines are. But there is a specific way to launch a comment to make sure it kind of meets the guidelines and it is not tossed out.

I would like to see information get out to communities well in advance of comment deadlines. One of the things we often see is when a draft of a plan will come out or something. It will come out halfway through the comment period with a 30-day review. With a 30-day window to provide comments. In many cases, it will get there even later than that so I would like for the BLM to really take into consideration how long it takes to get documents out to a village or rural community. And give people and adequate opportunity to really analyze what is in these because I do it full time and it is complex, the information.

As far as mapping information, the more up to date those can be, the more descriptive those maps can be, the better opportunity the public will have to understand some of the conveyance issues and some of the planning areas.

As far as comment deadlines in general when we get to that point on this plan I would like the BLM to just really take into consideration, be respectful of local hunting windows, hunting season. You know on the Bay Plan, the final plan came out for that planning area and it was released on December 7th with a 30-day comment period when there was three major holidays in the Bay region. So you know, nothing will draw more skepticism against the motives of BLM and that may have just been on a bad timing, but I would just recommend you really look hard at local celebrations that are happening, hunting seasons and plan it accordingly to that.

<p>I think that is hard to do [making specific comments]. When you ask for all this information that you are asking for, you know I don't care who you are in this room nobody has been on all those trails or across all that land. So how can you expect the general public to make that comment to address that problem? Because sooner or later, someday down the road, maybe my grandkid, maybe my great, great grandkid might be the one who wants to go across there. I don't know. It is going to take years for this thing to ever grow up to where you know; you have big cities all over. It's not going to happen.</p>
<p>I am glad to hear there is going to be as much public comment in bush areas as you planned. I hope that you will be able to involve the whole community in different places where you go and speak. I know for example, in the land exchange issue that was held something like a 160 people came out in Fort Yukon alone to talk about what was going to happen to the land. Everyone was really concerned.</p>
<p>My hope is that folks that live a subsistence lifestyle out in these areas will be able to participate in this process in a clear and concise manner. I would recommend that an interpreter that is okayed by the local community, that they be involved in this process so that particularly the elders can be involved in the process and pass their ideas and thoughts and concerns along to the folks that are out in the front making the comments. Sometimes that is not always the elders and folks like that.</p>
<p>I would hope that the cultural information, historical, spiritual, those things that the folks out in the communities. That BLM works closely to identify such things and involves people in the process in a manner that people feel comfortable.</p>
<p>Why is the Black River included with other well established areas, such as the White Mountains, Steese, and Fortymile? How can it be on the same time frame?</p>
<p>How come the Black River is included in your plan when the information you have is not complete and thorough?</p>
<p>We question the usefulness of trying to do a single "umbrella" plan for such a diverse set of lands. You already have experience with the existing RMPs for White Mountains NRA, the Steese NCA and a Framework Plan for the Fortymile. You therefore know the specifics of what works and what needs to be revised. We are concerned that combining these disparate areas into a single plan will result in such a general plan as to be without much value to the land manager trying to make future decisions and would give short shift to the specific mandates establishing the units. We urge you to provide separate planning efforts for the White Mountains NRA and the Steese NCA.</p>
<p>The proposed plan will address both general public lands, (that are widely scattered in the eastern interior), as well as specific conservation lands such as the Wild Rivers, Recreation and Conservation Areas which were established by Congressional action in 1980. Previous management planning focused specifically on each individual conservation unit. Our concern is that by combining this planning effort with the other public lands, that specific emphasis that is required for the conservation units may be lost or weakened. This must not happen. Furthermore, we are concerned that without separate, specific management plans for each conservation system unit, the subsequent planning document will likely become inordinately complex and confusing, and will diminish opportunity for the public to submit constructive comments on the draft plan. We recommend that you seriously reconsider the issue of combining conservation units and general public parcels in the proposed plan.</p>
<p>Because the BLM lands located in the upper Black River region have not been studied very well and most resource inventories are lacking for this area, we recommend that the planning schedule be expanded to allow more time to address basic information deficiencies.</p>

With regards to the entire area that is laid out, we are well aware there is an existing history of developing plans for the White Mountains, Steese, and at least for the Fortymile River area. But as has been pointed out earlier, the Black River area is really a different area from the standpoint of inventory, previous regulations, and planning process. It's really a frontier and I would suggest you may want to treat the Black River quite differently from the other areas, possibly even need to put it on a separate planning process and with a different time frame because of the need for better inventory and background data collection for the upper Black River. Where perhaps we don't know as much about that area as some of the other areas that BLM has had more experience in.

The BLM has elected, as a result of financial and staff limitations, to combine what was originally three separate planning areas (and one unplanned area) with three separate management plans, into one large RMP/EIS. Our organizations are concerned about the layout and readability of the draft and final documents. These distinct areas each have special management needs and objectives based on their designations. For BLM to meet the requirements of the NEPA there will have to be: An identified purpose and need for each planning area; A review of four alternatives for each of the planning areas – resulting in 16 total alternatives for review; Four 'affected environment' analyses, one for each planning area; Four 'environmental consequences' analyses, one for each planning area; Four summaries for each of the separate areas; and Four 'Record of Decisions'. The end result of meeting these statutory obligations will be a cumbersome EIS on a scale that is unreasonable for the public, Tribal Authorities, organizations and state and federal agencies to have to analyze, understand and comment upon.

According to BLM's Land Use Handbook H-1601-1 Appendix C page 27, BLM must 'develop stand-alone RMP/EIS level for all national monuments, and congressionally designated national conservation areas and national recreation areas...' By combining these areas BLM is clearly violating the agency prescribed practices.

I definitely have some concerns that each of the four areas and combining all the planning areas into [one] and the way they are being dealt with in this plan is troubling. Especially within the Black River area inclusion, in that there is really no inventory or past document to work off of. So I really would recommend that the BLM in relation to the Black river area specifically really take a long hard comprehensive look at that area and really work to determine cultural and historical significance of that use or of that area, biological significance. It is crucial the livelihoods of the people who live there as it has been for thousands of years. And any disturbance to that area or any shortsighted planning actually would be detrimental to the people that plan on the resources there so much. So I hope if you take a long hard look at that area you will consider it for special protection, designations. I think if you do a comprehensive approach you will find that the values that are found in that area warrant special protection,

Each of these four areas deserves a separate plan: the White Mountains, the Steese because in ANILCA actually it was required that there be a separate plans. Now maybe it was only the first plan had to be a separate plan. But it was a good practice. They have different mandates and different people know different things about those areas and have different concerns. I think the Fortymile River is very different and the Black River. We really do need that inventory. You are starting from ground zero and because it is remote and so important to the local people in that area, I think it would be a lot more effective to separate them. From a practical matter, if you are talking about your alternatives and you have four alternatives for each area, you have a matrix of 16 different alternatives potentially and how do you combine them? It is just overwhelming for the reviewer. We don't want to see a cookie cutter approach of just every alternative is just lift the d-1 withdrawals or as primitive management, we would love to see primitive management for you know most of it probably. But there are site-specific things that

<p>will be different in each one and it will be overwhelming for the public to deal with them in this complicated matrix and I don't think you will get the kind of information you need.</p>
<p>I echo the concerns of people that have spoken before me about ecological sensitive areas, critical subsistence areas, and just really thinking out each step with any changes that occur and looking at each unit as it stands right now, as it stands alone. There is already a White Mountains Management Plan that's been around forever. A Steese Conservation Area plan and just maintaining those. Not somehow getting all this thrown in together in a blanket way in the planning process. I don't think it seems like it is. But just making sure that is not the case.</p>
<p>I work for the Gwitchin tribal government in Fort Yukon. I am glad that BLM is having the scoping meetings and I think BLM in the past has done a very good job in the Steese Mountains. I would like to request scoping meetings within all the villages that are within the area, resource management plan area with the tribal governments. I think that would be very valuable information that BLM could retain.</p>
<p>Why is BLM making decisions without the input from Chalkyitsik, we live here. Chalkyitsik Tribe is requesting from the BLM that they appoint a tribal member seat to sit at every decision making meeting concerning Chalkyitsik or the Black River or any areas concerning our livelihood. MOU agreement possible: Chalkyitsik as a cooperating agency, "memorandum of understanding". How could the tribe be a cooperating agency and what would the commitment be?</p>
<p>If projects under the revised RMP would affect resources of use or concern to tribal governments or their members, then the RMP/EIS document should describe the process and outcome of government-to-government consultation between BLM and each of tribal government involved, issues that were raised, if any, and how those issues were addressed.</p>
<p>Executive Order 13175 directs all federal agencies to consult with tribes before promulgating any regulations which will have "tribal implications." Because of the significant potential impacts to tribes and subsistence resources on the Yukon River from the Eastern Interior RMP, BLM must consult with all of the potentially affected tribes on this matter. Because of the complexity of the issue and the probable length of the EIS, to adequately comply with the requirements for consultation, summary materials should be developed which, along with the full EIS can provide a resource to tribes to adequately participate. Further, BLM should make use of available opportunities to conduct presentations about the matters under consideration at forums including, but not limited to: Federal Subsistence Regional Advisory Councils, Alaska State Fish and Game Advisory Committees and the Yukon River Panel.</p>
<p>Coordination with Tribal government means ongoing communication to resolve any inconsistencies between land management (FLPMA section 202 (c)(9)) and allow ample time for Tribal representatives to comment on BLM management plans (43 CFR 1610.3-1). This means that the BLM must account for the remote nature and unique situations for each Tribal village to allow for delivery and review of planning documents so that meaningful meetings between governments can occur and in depth comments can be created. The BLM must further honor the ongoing efforts of tribes as land owners to restore and protect their surrounding resources. The Council of Athabascan Tribal Governments (CATG) is working on a Traditional Land Use Plan and should be contacted to coordinate efforts, share information and avoid conflicts of future management.</p>

<p>Cooperation between governments is the process of working together to create a land use plan (40 CFR 1501.5 and 1501.6). This cooperation should be formalized through an agreement with a true understanding of expectations and outcomes as a result of the relationship. In this way Tribes and the BLM can work together to create goals and objectives for the land in a cooperative and inclusive manner. This will ensure the balance of stakeholder interests such as public recreation, private development, and subsistence, is properly met.</p>
<p>Consultation is the formal effort to obtain the ‘advice or opinion’ of a tribe. This allows the BLM to utilize the local expertise for a planning area (BLM Land Use Planning Handbook H-1601-1). However, all too often consultation meetings become public presentations from government agencies with little two way conversation – leaving a feeling that no one was listened to and nothing good came of the time spent. Ultimately, these interactions, over time lead to great mistrust and disenfranchisement with the system. When comments are submitted by tribal authorities, either at meetings or in writing, they are labeled as non-substantive because they state preference or opinion. This causes further disenfranchisement as some of the most respected members of the community do not even have their voices heard.</p>
<p>During collaboration Alternative Dispute Resolution should be utilized to ensure successful outcomes. Working to resolve even the most difficult conflicts will help improve the reputation of the BLM and foster ownership of the Resource Management Plan.</p>
<p>You’ve done EIS’s in all the other part of that map that you have down below there but you’ve included this area up here [Black River] without having all of that information that you have on the other lands and you got this one big green area up that there that says Black River area and you don’t have all of the information that you have on them other lands but yet you’ve included that in your plan. Why is that?</p>
<p>You cannot just pick any old day for a public meeting. Since Tok is the service center for the Eastern Interior we have all kinds of meetings, public events, school activities, etc. It would be very easy for you to pick a bad day and have no turn-out. Where and how you post your notice [for meetings] is critical, because the bulletin boards are over crowded with all kinds of notices.</p>
<p>Who is the BLM talking to, and where is their information coming from?</p>
<p>BLM must consider the following Federal mineral policies throughout its decision making process: General Mining Law of 1872 as amended which states: "...mineral deposits belonging to the United States ...shall be free and open to exploration..."; the Mining and Mineral Policy Act of 1970 that states: "...it is in the national interest...to foster...mining...(and) domestic mineral resources..."; the Federal Land Management and Policy Act of 1976 that states "...the public lands shall be managed...(to recognize) the nation’s need for domestic sources of minerals..."; and the National Materials and Minerals Policy Research Act of 1980 that states "...the continuing policy of the United States (is) ... to promote an adequate and stable supply of minerals...to maintain national security, economic well being and industrial production...".</p>
<p>The planning team should include an experienced geologist or mining engineer from the BLM minerals office as a team member, specifically charged with addressing minerals issues.</p>
<p>The minerals and access data should be incorporated as the first phase in the plan development. This data will then provide a base map for all other work and will greatly assist in minimization of future conflicts, both in the planning process and in the actual use of the plan once it is completed.</p>
<p>The new plan should clarify that each of the subsequent individual plans and projects would be subject to separate NEPA analyses.</p>

<p>The RMP/EIS should clearly identify the underlying purpose and need to which BLM is responding to in proposing the alternatives, including the broader public interest and need. The purpose of the proposed action would typically be the specific objectives of the new RMP, while the need for the plan may be to eliminate a broader underlying problem or take advantage of an opportunity. Thus, the purpose and need should be a clear, objective statement of the rationale for the proposed project, as it provides the framework for identifying project alternatives.</p>
<p>The EIS should include a range of reasonable alternatives that meet the stated purpose and need for the RMP and that are responsive to the issues identified during the scoping process.</p>
<p>The Council of Environmental Quality recommends that all reasonable alternatives be considered, even if some of them could be outside the jurisdiction of the agency.</p>
<p>The environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public. The potential impacts of each alternative should be quantified to the greatest extent possible. It would also be useful to list each alternative action's impacts and corresponding mitigation measures. EPA encourages selection of feasible alternatives that will minimize environmental degradation.</p>
<p>EPA recommends that tables, maps, figures, charts, photos, etc., be used as much as possible and wherever appropriate to present and display information and specific features of alternatives so that the various alternatives can be clearly understood.</p>
<p>We believe that an alternatives matrix table that summarizes major features and significant environmental impacts of alternatives should be provided to facilitate understanding of the alternatives, particularly distinctions between alternatives, and to provide a comparative evaluation of alternatives in a manner that sharply defines issues for the decision maker and the public to make in regard to a reasoned choice among alternatives (40 CFR 1502.14).</p>
<p>More specific measures are often developed for individual alternatives to mitigate particular impacts. Such measures, as well as their anticipated effectiveness in accomplishing the planned purpose should be disclosed.</p>
<p>The following is a list of suggested topics for inclusion in the alternative analysis: See EPA letter for list - Not an issue</p>
<p>The EIS should include a discussion of environmental effects and mitigation measures. This would involve delineation and description of the affected environment, indication of resources that would be impacted, the nature of the impacts, and a listing of mitigation measures for the impacts.</p>
<p>The EIS should analyze and disclose the environmental impacts of the management alternatives, including the effect of implementing the alternative on the physical, chemical, and biological resources such as air and water quality, biologic components or ecosystems, and the likelihood of success of mitigation measures.</p>
<p>The discussion should include analysis of impacts resulting from activities on all land ownerships (i.e., including non-Federal lands).</p>
<p>The discussion should consider the issues discussed below as well as unavoidable adverse environmental effects, short-term and long-term environmental considerations, and any irreversible or irretrievable commitments of resources involved with the alternatives should they be implemented.</p>

In accordance with 40 CFR 1502.16 this section [Environmental Effects] should address: Direct effects and their significance; Indirect effects and their significance; Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned; The environmental effects of alternatives including the proposed action; Energy requirements and conservation potential of various alternatives and mitigation measures; Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures; Urban quality, historic and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures; Means to mitigate adverse environmental impacts.

Statements made in the assessment should be substantiated either by data and analysis included in the document, or by reference to readily available supporting documents. When referencing documents or data not included in the NEPA document, information should be included to ensure the reader understands the quality and type of analysis actually completed. Environmental analysis documents should reflect the level of analysis and data compilation actually completed. Unless clearly documented, the reviewer may be unable to establish whether data exists to support conclusions within the analysis. Public accessibility to supporting documents is also important.

The CEQ regulations for implementing the procedural provisions of NEPA state that the environmental consequences section of an EIS should include: "Indirect effects and their significance (40 CFR 1502.16(b))." Indirect effects are defined as "...caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth- or development-inducing effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems" (40 CFR 1508.9(b)). The CEQ regulations also indicate that the EIS should include the "means to mitigate adverse environmental effects," which applies to indirect effects as well as direct effects.

In January 1997 the CEQ published, "Considering Cumulative Effects under the National Environmental Policy Act", guidance that provides a framework for analyzing cumulative effects. In May 1997 EPA published a document entitled, "Consideration of Cumulative Effects in EPA Review of NEPA Documents". This document is available online. EPA considers five key areas of information in reviewing cumulative effects analyses: clear identification of resources being cumulatively impacted and the geographic area where impacts occur; use of appropriate analysis area boundaries for the resource and time period over which the cumulative effects have occurred or will occur; identification of impacts to resources of concern in each area through analysis of cause-and-effects relationships (include scientifically defensible threshold levels); adequate evaluation of all past, present, and reasonable foreseeable future actions that have affected, are affecting, or would affect resources of concern (include adequate evaluation vs. benchmark or baseline conditions); and disclosure of the overall cumulative impacts expected if the individual impacts are allowed to accumulate, including exceedances of any of the established threshold levels in comparison to baseline conditions. Provide comparisons of cumulative impacts for the proposed management direction and the reasonable alternatives in relation to the no action alternative and/or an environmental reference point.

<p>While a broad consideration of resources is necessary for adequate assessment of cumulative impacts, the analysis should be focused on those resources that are significantly impacted. The EIS should identify the resources of concern or ecosystem components that might be affected by the proposed action or its alternatives. The ecological requirements necessary to sustain the resources of concern should be considered when assessing how the project and the other past, present and reasonably foreseeable future actions may cumulatively affect the resources of concern. Often these ecological requirements may extend beyond the boundaries of the project area, but reasonable limits should be made to the scope of the analysis.</p>
<p>A common inadequacy of environmental analyses is the lack of analysis or disclosure of the sum of individual effects of all projects on the local environment. A summary listing of other projects occurring in the vicinity without the accompanying analysis is insufficient. Another frequent oversight is that Agencies often tend to limit the scope of their analyses to those areas over which they have direct authority or to the boundary of the relevant management area or project area. This may not cover the effects to the area or resources of concern.</p>
<p>Because projects under the RMP could potentially impact a variety of resources in the planning area and for an extended period of time, we recommend that the RMP projects be designed to include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The RMP/EIS should describe the monitoring program and how it would be used as an effective feedback mechanism so that any needed adjustments can be made to projects under the new RMP to meet environmental objectives.</p>
<p>A comprehensive discussion of proposed mitigation for direct, indirect and cumulative impacts is required by the CEQ Regulations for Implementing the Procedural Provisions of NEPA (40 CFR Part 1500). The CEQ regulations state that an EIS should include the means to mitigate adverse environmental effects and disclose the effectiveness of mitigation measures in minimizing adverse effects (40 CFR 1508.7). Simply listing the mitigation measures is insufficient to qualify as the reasoned discussion and “hard look” required by NEPA. Mitigation measures must be discussed in sufficient detail to ensure that potential detrimental environmental effects and measures to mitigate those effects have been fairly evaluated. Monitoring plans are also needed for measuring the effectiveness of the mitigation measures (quantitatively-if possible, and/or a qualitatively), and determining the need for modifying mitigation. The RMP/EIS should also address coordination efforts and funding or budget needs required to undertake or implement monitoring and mitigation measures.</p>
<p>EPA recommends that the EIS identify and discuss areas with special characteristics and values that may be suitable or eligible for special designations and recommend these areas for such designations. Areas previously designated should be evaluated for meeting the goals of the designation and where not achieving the goals, additional measures should be identified to ensure attainment within a given amount of time. For example, the RMP/EIS should identify rivers presently designated as Wild and Scenic, and identify and discuss rivers with wild and scenic characteristics and values that may be suitable or eligible for such designation. The Wild and Scenic Rivers Act, Sections 10, 11, and 12, encourages Federal agencies to enter into cooperative agreements with States and local governments in order to protect and manage WSR values. EPA believes that such designations would be appropriate and will protect unique resource values and provide a higher level of natural resource protection.</p>
<p>Maintaining and strengthening biodiversity is a critical consideration in land and resource management plans, especially if special habitats (i.e., wetlands, T species habitat) may be affected. The state of the art for this issue is changing rapidly. CEQ prepared guidance entitled, Incorporating Biodiversity Considerations Into Environmental Impact Analysis Under the NEPA, which can be found at <a href="http://www.eh.doe.gov/nepa/tools/guidance/Guidance-PDFs/iii-9.pdf">http://www.eh.doe.gov/nepa/tools/guidance/Guidance-PDFs/iii-9.pdf</a>.</p>

<p>Site-specific analyses will generally be performed in subsequent project level documents. However, we believe management direction that will influence potential environmental impacts of proposed activities tiered to the RMP should be evaluated to disclose potential environmental impacts from programmatic actions to the extent possible (quantitatively if possible, otherwise qualitatively). The need to complete future site-specific analyses does not preclude the obligation to complete first level screening of reasonably foreseeable environmental effects of the proposed action, similar and connected actions and their cumulative effects at the RMP programmatic level. It is important for the RMP/EIS, although a programmatic document to which site-specific analyses will be tiered, to include adequate evaluation and disclosure of the potential environmental impacts associated with management direction for implementation of proposed projects tiered to the RMP.</p>
<p>The RMP should describe how the NEPA process will be incorporated into future land management decisions for future site-specific projects. The framework for public involvement in future management decisions should also be made clear. Also, a clear decision point at which an appeal or litigation can be initiated should be identified.</p>
<p>Consideration of special land classifications such as Areas of Critical Environmental Concern for areas such as the Salmon Fork of the Black River should be part of this planning process.</p>
<p>See the “Select State Tools” document, dated June 2005. This document helps to illuminate some of the many jurisdictional issues [between BLM and the State] that are often overlooked and which may be relevant within the RMP, such as: a) The Departments of Fish and Game and Natural Resources should both be consulted regarding management of all water bodies within the planning area for issues related to state authorities, including anadromous stream crossings, diversions, public use, placer mining, and dam construction; b) When lands are conveyed to private entities, under provisions of the Alaska Constitution, management of fish and wildlife are retained by the State for the common good of all residents; and c) The Department of Environmental Conservation has numerous regulations used to monitor and mitigate impacts to resources within the state, including human waste disposal, air and water quality standards.</p>
<p>We recommend that BLM include the attached Fact Sheet “Generally Allowed Uses on State Lands and Conditions for Generally Allowed Uses” as an appendix in the RMP. This Fact Sheet summarizes regulations at 11 AAC 96.020 and 96.025 into a clear and practical format and can facilitate a better understanding of the “Generally Allowed Uses” if and when they are referenced in the RMP, particularly in discussions an proposed policies regarding off-highway vehicle use.</p>
<p>In addition to landowner management plans, we recommend BLM consult and integrate the planning documents of local governments. The Department of Community and Economic Development maintains another valuable source of detailed community information using an on-line database. This site also contains detailed community profile maps that may prove useful in reviewing land status and existing infrastructure.</p>
<p>Please ensure that state oversight is sufficiently referenced, particularly in the effects analysis. Oftentimes, the possible effects stated within the plan may already be mitigated by regulations and/or permitting by state resource agencies, which can mischaracterize the overall extent of impacts from the alternatives.</p>

<p>We encourage the BLM to provide a comprehensive, yet balanced, overview of resource development within the planning area. In each industry, such as mining, forestry, etc., there are always both positive and negative effects that are explored in great detail when the activities are proposed and permitted. The economic importance of mining and oil and gas activities can not be understated. Not only can it provide a substantial income to local residents, business and the State, but it helps create valuable job skills and long-term regional investment. There is also the potential for positive impacts to local governments (and indirectly to many residents of the region) by providing a local tax base for funding government programs and projects.</p>
<p>Our organizations feel that a new RMP/EIS is not needed, only a revision to update the information and improve management directives. Originally, revision was the intent for the Eastern Interior RMP and we feel that the BLM may be allowing potentially vast and detrimental changes by conducting a new NEPA process.</p>
<p>To determine the best management for the planning area the BLM must review impacts and the affected environment on a larger scale, beyond the borders of the region. This will help to ‘understand priority resource issues,’ (such as Yukon River fisheries) ‘tailor decisions to specific needs and circumstances, and analyze cumulative impacts.’ (BLM LUP Handbook H-1601-1 at 14)</p>
<p>We recommend prioritizing adaptive management in the Eastern Interior to ensure goals established in this RMP process are met with desirable outcomes. The uncertainty of climate change impacts, changing wildlife considerations, unforeseen shifts at the ecosystem level and possible impacts on human health from future development obligates BLM to ensure the Eastern Interior RMP has ‘clearly identified outcomes, monitoring to determine if actions are meeting outcomes, and, if not,’ the BLM must begin ‘facilitating management changes that will best ensure outcomes are met, or to reevaluate the outcomes.’ (BLM LUP Handbook H-1601-1 at 36)</p>
<p>Mitigation measures should be included to ensure that any post decision adverse consequences can be reduced or avoided for social, cultural, economic and environmental health.</p>
<p>An EIS is a cumbersome read for members of the general public. According to Gallagher and Patrick-Riley, even though the CEQ 1978 Part 1502.8 requires that an EIS be written in plain language, so that the public and decision makers are able to understand the content, the language used in most Land Management Plans requires three to six years of college education. The result of this may limit or bias who participates in agency planning. We recommend modeling the layout after the 1980’s Proposed Resource Management Plan/Environmental Impact Statement for the Steese and the White Mountains. The layout clearly prescribed goals and objectives making it easy to follow and encouraging participation to create the best management plan possible.</p>
<p>The Eastern Interior RMP/EIS should be organized and written in such a matter as ensure clarity and participation. Our organizations recommend that four separate EISs (or one EIS separated into individual volumes for each area) should be printed and distributed, as well as four separate summaries. This will increase clarity and organization of materials, and aid in effective public involvement as well as prevent violation of agency mandates.</p>
<p>Further, due to the extended length of this RMP and the remote nature of village participants we encourage extended comment periods on both the draft and the final RMPs. We understand the limitations of the BLM but hope that the spirit and intent of NEPA will be honored and the highest public participation be achieved during this process. We hope that we can work together with BLM and other stake holders to find solutions to issues as they arise.</p>
<p>The RMP/EIS should fully discuss the NLCS program and how any program guidelines or policies will affect both the planning process and future management direction for those areas included in the system. The resolution of any conflicts between the administrative program’s mission and ANILCA mandates must defer to the statute.</p>

<p>What is the best place to advertise for meetings in Central? The post office or the road house.</p>
<p>The Council of Athabaskan Tribal Governments has done a traditional land usage planning and I ask that BLM go to them and get this traditional land usage plan from them and to look at it and see because they have it documented from our elders who know from way back and the elders before them of who was on this land and did what on our land. Who lived there and who hunted what.</p>
<p>We'd like to be included in all your decision-making so that the information you guys are gathering we need input from the village here in Chalkyitsik because what you guys are planning up there is going to be affecting the people here and we need to be – we're requesting that you guys let us know and have a seat on the decision-making on the plans that you guys are putting together.</p>
<p>[The maps are hard to understand] It was the same thing when Doyon and Refuge came here. They would show us one map that showed all of this and then they would show another map that didn't have it all on there and then there comes another map that didn't have it all on there. They would come in here and show us a bunch of different maps. Then they showed us a map of the first oil well on the North Slope and then they showed a current map of all the oil wells on the North Slope. Then they showed us a map of the Refuge land where they landed to develop oil. I took the one map of the North Slope and all the current oil developments on there now and I put it over the land of the Refuge and it almost fit on there exactly and I said, this is your refuge in about 100 years. They couldn't disagree.</p>
<p>How could our tribe be a cooperating agency and work with you? We do want to work with you. I know you guys are going to do it anyway but we need to be there on the table.</p>
<p>You had mentioned earlier that as a cooperating agency, BLM will allow the Chalkyitsik tribe to sit at the table. What about an uncooperative agency sitting at the table? You let us in only if we agree with you?</p>
<p>The most useful thing for me today is seeing all these maps. Because it is very hard to respond in the scoping process without understanding what we are talking about and since we have not done this process for 25 or more years, most of us go about enjoying the White Mountains. I fly over the White Mountains as much as I am in it, and that sense of vast wild land as God created it is important to me and I know it is important to our members [Northern Environmental Center members] so I think starting with a better sense of the mapped information to let people know here is what the current plan says in a way that is easy to understand and then what are all these resources, what you've got. Now I know this is part of your planning process but it is really hard to even react until we have the map, Oh the Porcupine Caribou Herd is there. You know I might not have thought of that because that is kind of a blank space to me because I have never been in that far east. I know over in Canada though there is the Fishing Branch area, its right on the other side of the border. But if you don't map that other side of the border you are not going to know how the whole ecosystem interacts and why it is so important. Not only to the fish but the people who have lived there forever and the way the wildlife moves.</p>
<p>I request that there be a second round of post scoping meetings before you really get into your plan. Where you have some information pulled together. Come back and talk to us. Go to each of these communities and share your picture of what is there and how it is managed now. Because that would evoke a lot more information about future management. You know we are looking into 50 years from now. What are we going to have as a Nation with these conservation system units?</p>

The RMP covers a broad variety of topics. What will be the priorities in the RMP?
If a small operator applies for a right-of-way or mining permit. Do they have to pay for the cost of the Environmental Assessment? Restrictions and cost recovery should not be such to preclude small operators. BLM should let the applicant know the cost up front, before they do work on the Environmental Assessment.

## B.18. General Comments

Please respect that you have been charged with protecting the lands that belong to the citizens of the United States....not special interest industries that seek to exploit those lands for private profit.
Exploitation is shortsighted and leaves the true value of the lands under your protection diminished or lost altogether. Humans have overpopulated this planet. Ruining habitat, the land that renews the wastes we dump into the air and water, ensures our eventual demise.
We also lose the spiritual and recreational value of those lands when we turn it into industry. Well managed cattle grazing is one thing, oil, natural gas, coal and mineral mining is not acceptable.
Opening BLM lands to industry is a onetime deal; there's no turning back, the damage is done forever. Leaving BLM lands in their natural state generates dividends forever.
Do your job-Protect Our Public lands, waters & wildlife! Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.
Let Alaska stay wild! Why is it that with all we know about raping resources from the earth and its detrimental effect that companies are still trying to start up new programs to do just that? It seems obvious to me that it is greed. The time and energy put into finding ways to ruin Alaska should be put into alternative ways to help support the humans without causing such harm to the wildlife. Let's stop this action on Alaska!
Please remember that the short term gains allowed by access for development into the last vast regions of Alaska, will be overturned by the damages done to the native populations of flora & fauna. We as a nation, have a responsibility to allow the wild places be untouched (as much as possible) so that all of us can appreciate the sheer grandness that is as it currently stands. Please use constraint when deciding how much development you all will allow to occur.
A system for monitoring public use levels and the subsequent impacts should be identified and explained along with a proposed mechanism with measurable thresholds which would trigger management actions to prevent degradation of wild values. Fish, wildlife, habitat, opportunities for solitude, human generated noise, water quality, vegetation and soil impacts, and visual esthetics are some examples of values that should be monitored and protected by this management system.
According to the Federal Land Management Policy Act (FLPMA) Section 103 (c), where there are competing resource uses and values in the same area, the BLM must prioritize the management of the land in a combination that will best meet multiple use and sustained yield mandates. With this in mind, the priorities of primitive management areas, Research Natural Areas, Wild and Scenic River Corridors, and Conservation and Recreation Areas must be reviewed for their impacts to these special designations – with mitigation measures and protection in mind. The best combination of uses must put the natural and wild environment before development in designated areas and critical habitats.

Recreational activities on the Yukon and it's tributaries abound for both residents and tourists. (Brabets et al, 2000) Activities such as rafting, fishing, and hunting are supported all along the vast Yukon. Protection for the subsistence, recreation, commercial fishing and sport economies that exist all along the Yukon should be a priority for the BLM's managed lands along the river.
Most of the comments I want to make deal with the upper Black River area. I understand there is really very little data, very little information on there, and no inventory. It is a very big area and it also has a long tradition and a huge history. There are people living today whose families come from that area and they still depend on that area for subsistence in fact to a very significant degree. So I am very pleased to hear that they are going to be included in this scoping process.
Sites of importance on the Black River: Identify grave sites, animal habitat/nesting ground, historic and prehistoric sites, mineral, traditional use areas, scenic grounds, fishing and hunting areas, subsistence, Salmon Village, salmon spawning, Chalkyitsik's use to live, historic trails, historic structures, subsistence related (within Chalkyitsik & sharing of resources, village-to-village).
What scope of study is BLM required to do [for the Eastern Interior RMPs]?
We are very concerned that the primitive and remote lands of the upper Black River region be addressed very cautiously to assure that sensitive wildlife and wildlands values, which are known to exist there, are preserved.
So other people addressed many of the things in the Black River Plan. I think it is important to think about how you are doing your planning and what work has been done with the subsistence, cultural, historical, sacred, fish and wildlife, vegetation resources. If this is a planning process, how to do it so that you get the best information and there may need to be full blown studies that need to be done in order to accomplish the goals and without that layer, any talk of changing the management from how it is today might be quite hard.
I grew up around Fort Yukon all my life and Chalkyitsik and the Black River area. I would like to see it kept in the condition it is in.
I request that you look at cumulative impacts of your areas and what is going on in adjacent areas that might affect the management schemes on your own lands. What is going around White Mountains or the other areas?
The scandal plagued U.S. DOI, BLM has a plan to let mining profiteers, oil & gas profiteers run rampant to destroy this 8 million acre site in Alaska, which should be preserved for our grandchildren and for wildlife and bird preservation. Lately plans from this agency seem to meet only the needs of mining profiteers, timber barons, oil & gas profiteers, and certainly not what the public wants from this land which is preservation and protection.
It is clear that the present anti environmental administration is most intensely trying to decimate any open space where anything is not covered with macadam or oil rigs.
I want no development plans at all. I expect to be kept advised of all new opportunities for public input. BLM seems like the worst federal agency. I note they want to work with Alaska Fish and Game, which is as venal and vicious a bunch of wildlife exterminators as any American find anywhere.
Keep the Steese and White Mountains in a conservation status.
I would like to see a liberalization as to what activities can be done like hobbyist gold panning, fishing, hunting, looking around.
Public lands are in danger of being compromised for short term and short sighted development, and the BLM's planning activity could irreversibly degrade land with little or no concern for the people who live off the land or those that come after us.

<p>In the waning days of the Bush Administration, drilling applications have become more and more importunate, necessitating a "time-out". To maximize the benefits and minimize the damage, you must follow all the usual protracted procedures, such as those involving EIS's.</p>
<p>Land management and multiple use - The BLM has a mandate from Congress to manage its lands for multiple use. This requirement should be paramount in all aspects of the Plan.</p>
<p>It was largely the efforts of a BLM employee that bird dogged and fought for the Fortymile Wild River, a fellow named Jules Tileston. He is retired now. But if it was not for that BLM person, I don't think there would a Fortymile wild river. He personally worked very hard to get that protection and you have to ask the question well how could you think of getting a wild river in the middle of such a historically heavy mining district and isn't that a recipe for conflict? And perhaps to some degree it was. But I think he was thinking along the lines of both the historic values along the Fortymile river as well as its recreational values and that I believe he was thinking from a standpoint of vision, of seeing the Bureau of Land Management grow into becoming a more proactive land steward of our public lands than the history of BLM had been prior to that time. So I think there was an act of vision involved in his advocacy for the Fortymile River. That said, I guess I look forward to similar professional efforts on the part of BLM through this planning process to take these responsibilities for public land stewardship to the next level, I hope that will be the case here. That we can demonstrate that BLM is capable of doing a fine job of land stewardship that we will all be proud of.</p>
<p>With regard to the established national conservation units to be addressed in the proposed effort, we encourage the BLM to do a thorough review of all public uses on these units as they were governed by the previous management plans and prescribe effective remedies in cases where the previous plans have failed to preserve or maintain the resource qualities for which these units were originally established.</p>
<p>The State requests that the plan and planning process explicitly recognize the State's authorities that overlay BLM's land management responsibilities.</p>
<p>We also ask that BLM carefully review DNR area and management plans that address BLM lands that are state-selected and topfiled. The Tanana Basin and the Upper Yukon area plans include decisions on how state-selected lands are to be managed when they are conveyed. Of particular concern are state-selected lands that have been identified as a high priority for conveyance and are likely to be state-owned over the long term.</p>
<p>Though all provisions of ANILCA are important to the State, Sections 811, 1110(a), and 1316(a), are of particular importance for this planning effort. We recommend that BLM use direct quotes when referencing ANILCA in order to avoid confusion, especially sections 811 and 1110. Paraphrasing may unintentionally exclude specific wording essential to a full understanding of the law.</p>
<p>Section 403 of ANILCA establishes the White Mountains National Recreation Area and states that: "In planning for the recreational use and management of this area, the Secretary shall work closely with the State of Alaska."</p>
<p>Several reports from members [Fortymile Miners Association] in our mining district have pointed to BLM employees as abusing their positions to make unreasonable and illegal requests of the miners. A tighter rein and clearer instructions in regards to the limitations of the individual officers' authority should be worked into the new management plan.</p>
<p>In closing the Fortymile Mining Association encourages the BLM to honor their position as public servant and to recognize the miners in the Fortymile as a section of the public to whom the BLM is beholden and should work hard to serve. Recreational use of the land whom the BLM is beholden and should work hard to serve. Recreational use of the land should not take precedence over other land uses such as mineral entry or access.</p>

<p>The Eastern Interior Planning Area RMP must fully incorporate the applicable provisions of ANILCA. These provisions provide management and planning direction for the Steese NCA, the White Mountains NRA, Birch Creek, Beaver Creek and the Fortymile River. ANILCA contains specific purposes and management directions for each of these areas and also incorporates and amends provisions of the Federal Land Policy and Management Act (FLPMA) and the Wild and Scenic Rivers Act.</p>
<p>Section 403 established the White Mountains NRA and directed that it be managed in accordance with the provisions of ANILCA Section 1312 and other provisions of that act, as well as FLPMA and other applicable law. This section also directs BLM to work closely with the State of Alaska in planning for the recreational use and management of the area.</p>
<p>And maybe to address Scott's concern, a general management intent to maximize or increase sustainable opportunity out there no matter whether they are opportunity for subsistence, recreation, or whatever, resource extraction. What we see in a lot of plans is diminishing opportunity. Where a certain area is, restrictions are imposed to appease a smaller user group. Overall, the opportunity decreases for the residents. And we would like to see a management intent to maximize sustainable opportunity.</p>
<p>I think you had the best idea already, a maximum sustainable opportunity alternative where the management decisions would be centered around making that sustainable opportunity possible. Hardening of trails, public awareness, all things you can do as opposed to restrictions.</p>
<p>There sometimes seems to be issues with individual employees at the BLM, lower down, coming out and trying to tell people, especially people that are dredging, things that they should or shouldn't be doing that are not according to what's publicly known as BLM policy so maybe the new plan could have some language with regards to what exactly is the authority of the individual officers on the ground. Can they really go and tell people, you know, threaten people that you can't do this here or you have to move your camp here. I mean, what is their exact authority because I know we've had issues with it as long as I've been here.</p>
<p>A second scoping meeting, posting all the stuff you have got so far on the ... maps on the web that are not absolutely gigantic. So they look okay on the screen. They might not be great for printing. You can have another quality for printing. But I think that would really help people and then following up these meetings with the people who came and all the communities. Sending them a book that is this stuff that you have put together before you have this next scoping meeting. It would be before you've fleshed out and analyzed all your alternatives. Because it is hard for me to give any sense of what kinds of alternatives I would like to see because I have not really studied what the current management is. So having that information pulled together. Before things are set in stone, basically. The thing we go in the mail told me nothing about. We had to do a lot of homework to figure out what is going on here. BLM staff have been really accommodating in answering a lot of questions and getting documents. I think that is really needed in order to help us through the process.</p>
<p>It might be helpful to have another round of meetings. I know we all hate meetings and we definitely don't want to have public hearings in the summer time because that is when we enjoy the White Mountains. Some people enjoy it in the winter. But I enjoy it in the summer.</p>
<p>How did BLM advertise the meeting in Tok? BLM needs to make a better effort to get the word out about meetings. Get an ad in the Mukluk News. Mukluk News claim they did not get a press release for this meeting. Most of the people getting notice are those involved in some organized group like Alaska Outdoor Council or Sierra Club. Need better notice to individuals. Mini-Mart in Tok is a good place to advertise meetings. Most public radio stations will post public service announcements for meetings.</p>

## B.19. Subsistence

<p>When completed and approved, the Eastern Interior RMP will provide an RMP for BLM lands in the upper Black River. These lands comprise the subsistence base for the people of Chalkyitsik. The Black River (Drahnjik) and its major tributary Salmon River (Teetrahnjik) flow through BLM lands that will be impacted by the RMP. The lives of the people of Chalkyitsik are inextricably connected to these rivers, the surrounding lands and their resources. Their association with these lands goes way back into a distant past, and the rivers and lands are more than just a source of subsistence resources. They provide a sense of community, a spiritual grounding, and hope for the future.</p>
<p>Areas around villages should be set aside for village subsistence uses.</p>
<p>My main concern is the continued “Traditional” use of these lands, primarily for trapping, hunting and fishing. As on State land and Refuge land these activities are not only allowed but encouraged. The State of Alaska and the Yukon Flats Wildlife Refuge have in place permitting for trap line cabins, trail use, and access. My access is by plane and I use trails that were in prior to ANILCA and Historical trails dating back to the Hudson Bay Company days. Should the BLM design this RMP toward these solving these issues that would greatly improve their image of being anti trapping. There is little or no industry in the Bush and the Native and Non-Native people make their living fighting fires, trapping, hunting and fishing. This is a good opportunity for the BLM to improve their image with the Bush Communities. I hope to work with you on this trapping issue in the near future. I look forward to positive results.</p>
<p>[Will BLM] do more study before development, because it is important to protect local subsistence.</p>
<p>How is BLM approaching subsistence study? August deadline for formal comments.</p>
<p>What is the highest level of protection for subsistence and water? What precautions will be there to protect subsistence [during mineral development]?</p>
<p>What is BLM’s plan for subsistence?</p>
<p>The importance of the Black River lands for subsistence by local people should be well described in the plan and should include the value of this area as critical habitat for migratory species, such as salmon, that are used for subsistence well beyond the region itself.</p>
<p>The RMP and EIS must take into consideration impacts to federally-protected subsistence users. Chinook and chum salmon are a vital subsistence resource for rural residents throughout the Yukon River. Without subsistence salmon to feed people and the sled dogs which are an integral part of the subsistence lifestyle on the Yukon, existence in these remote villages would be difficult, if not impossible. Salmon are of irreplaceable value to the cultural, spiritual, and nutritional needs of the Native people of the Western Alaska region. Subsistence salmon literally serve as the “grocery store” for village residents, and also serve vital cultural purposes. In communities where other subsistence resources such as moose and caribou have decreased, the value of salmon as the only subsistence resource is even greater. Under the Alaska National Interest Lands Conservation Act, federally-qualified subsistence uses have priority over other fish and wildlife needs in-river.</p>
<p>Impacts to subsistence users should be analyzed on a Yukon River watershed-wide basis, as any impacts to the salmon in the Eastern Interior region will be felt throughout the watershed given the anadromous nature of the fish. The result of management actions on the availability of and access to subsistence resources should be considered. Because the Chinook salmon run was not strong enough to support even all subsistence needs this year, particular concern should be given to protecting these stocks in the RMP.</p>

<p>The BLM needs to consider the impacts of climate change on subsistence resources and practices. Changes in habitat within and beyond BLM managed lands are predicted to stress all of the wildlife, waterfowl and fish populations that serve as subsistence resources. Some populations may increase in abundance within the Eastern Interior Planning Area while others may alter their migration and be unavailable.</p>
<p>The Department of Fish and Game calls for monitoring of subsistence harvests at the community level to assess necessary adaptations to the changing conditions in resources. The Department of Natural Resources states in their letter to the commission that traditional means of travel may be impacted because of the potential for less ice on lake and rivers and shorter seasons of frozen ground. Increases in fuel costs and changes in habitat and species diversity will change what subsistence foods are available. All of these finding from state based agencies should suit as ample warning of the potential impacts to the traditional way of life, not inclusive of direct impacts from development and other site specific management prescriptions that could promote damage to subsistence resources. We hope that the BLM will work closely with local and state experts to prevent and minimize impacts to habitat and wildlife – and prioritize the existing uses of the region over new incompatible uses.</p>
<p>Traditional ways of knowing should be utilized throughout the planning process to learn more about the history and traditions of the area, the value of resources, and the observed changes. There is a stigma against non-western ways of knowing and a standard that western science is the only means to document, monitor, and make decisions. We encourage the BLM, particularly in areas such as the Upper Black River where no previous management plan and little science exists, to form a hybrid of balanced perspectives with information from both local experts and existing science.</p>
<p>The Native people of Alaska are the keepers of great knowledge and understanding. Working with this knowledge system and incorporating practices and information into the Eastern Interior RMP will help foster stronger working relationships between governments and allow a sense of ownership and genuine participation in the process. The people who live in the villages are the people who will be most impacted by BLM’s planning efforts and should have a strong part in management decisions. Alaska National Interest Lands Conservation Act section 812 mandates that federal agencies ‘ seek data from, consult with and make use of, the special knowledge of local residents engages in subsistence uses.’</p>
<p>The working relationships should extend beyond the creation of the RMP – village resident are monitors of the environment and dependant upon their surroundings and in turn the success of land management actions. Traditional knowledge can help fill the gaps in western science as well as be the base for determining future studies.</p>
<p>The BLM should prioritize the protection of subsistence resources in the Eastern Interior planning area. A reasonable balance must be achieved between the inherent conflicts between mineral development proposals and operations and the protection of subsistence resources and habitats. According to Title VIII of the ANILCA, the federal government has a ‘trust responsibility to protect the hunting and fishing rights of Alaska’s indigenous peoples.’ (ANILCA Citizen’s Guide at 29)</p>
<p>ANILCA was intended to ‘guarantee the protection and continuation of subsistence uses by rural Native people’ (125 Cong. Rec. 9899, 9904, May 4, 1979). Development precludes wildlife as it fragments and eliminates habitat. Critical habitat of ample acreage must be prioritized for wildlife. The goal of section 802 of ANILCA is ‘to cause the least adverse impact possible on rural residents who depend upon subsistence uses of the resources’ on the public lands in Alaska. And section 804 establishes priority for subsistence over all other uses – particularly in times of short supply.</p>

<p>The impacts of time and space are inadequately weighted in 810 analyses. The current approach trivializes the importance of habitat and the reliance on the yearly migration and movement patterns of wildlife. What federal and state agencies consider ‘short term’ impacts – meaning wildlife is only displaced for a single season – can mean year long impacts to subsistence users. Displacing wildlife, even for short time periods, could mean traveling farther for harvest or not harvesting at all. The awareness of subsistence practices (locations, timing, and value) is just the beginning of BLM’s obligation. Suppression or prohibition of activities in critical areas at vital times will ensure that multiple-uses can co-exist. Habitat is also undervalued in 810 analyses. Reviews of harvest locations and migration patterns are not enough. A higher value must be placed on the large amount of habitat necessary to maintain healthy wildlife populations, which in turn ensure healthy people.</p>
<p>BLM must develop a clear strategy for conducting 810 hearings. Thus far, 810 hearings have been conducted in conjunction with public scoping meetings. This is an approved practice but the meetings must clearly define objectives for attendees and segment discussions to allow for appropriate use of time and effective information sharing. This may mean establishing agendas that guide discussions and define the desired outcome. To be most effective BLM should consider sending an outline ahead so time and resources can be allocated to organize and gather information to presentation to BLM and start a two way conversation.</p>
<p>The right tools must be present for the best possible information to be passed between government representatives. To document observed migration patterns, harvest areas and subsistence resources the BLM must have maps of accurate scale and the suitable working materials for appropriate documentation.</p>
<p>An example of a missed opportunity is the Chalkyitsik scoping meeting. Chalkyitsik relies heavily on the resources in the Upper Black River area, where no current management plan and little inventory exists. Despite this, the BLM subsistence specialist and author of the subsistence portion of the Eastern Interior RMP was not present at the meeting. Furthermore the maps presented at the meeting were of insufficient scale to gain scoping knowledge that is helpful for planning. We encourage BLM to take a more comprehensive approach to working with subsistence users throughout the region and develop a realistic model for information sharing that can be properly incorporated into the plan.</p>
<p>The value of subsistence goes beyond economics: ‘these resources are also critical to Native Alaskans’ cultural and social identity. A subsistence lifestyle requires an understanding of the intricate web that links humans, animals, and the environment. Alaskan Natives rely on the subsistence lifestyle, but external forces are threatening this way of life. Foreign values such as wage employment, the accumulation of wealth, and the exploitation of natural resources compete with Native values.’ (Cheyette, 1997) Changes in the availability of subsistence resources also have a profound impact on the sharing of resources from village to village. Throughout history tribes throughout the Eastern Interior have established a complex social network of sharing resources. Further impacts to the availability of resources will undoubtedly change the character for these networks and relationship between tribes throughout the region. (Magdanz and Utermohle, 2005)</p>
<p>We recommend the following for review by the BLM planning staff: <i>Social Networks and Wildlife Management: An Example from Deering Alaska</i> by James S. Magdanz and Charles J. Utermohle. 2005.</p>
<p>Lands managed by the BLM in the planning area of the Eastern Interior are important for customary and traditional uses of fish and wildlife resources among a number of areas and communities where subsistence is a principal characteristic of the economy, culture, and way of life. These lands also serve as important habitat for resources used for subsistence purposes by residents of the planning area and those from elsewhere in Alaska.</p>

Those lands located in the Fairbanks Nonsubsistence Area as defined in 5 AAC 99.015(4) are the exception, where the Alaska Board of Game and Alaska Board of Fisheries may not permit subsistence hunting or fishing because the joint boards determined that customary and traditional uses of wild resources does not characterize the economy, culture, and way of life of this defined area.

Due to the significance of wild resource uses to the economies, cultures, and ways of life of Interior Alaska communities, we [State] request that the plan document and describe the customary and traditional wild resource use patterns in those communities located on or near BLM lands and those that have a pattern of using those lands for subsistence purposes; these communities include, but are not limited to Beaver, Birch Creek, Chalkyitsik, Chicken, Circle, Central, Dot Lake, Eagle, Fort Yukon, Healy Lake, Minto, Nenana, Northway, Stevens Village, Tanacross, Tetlin, Tok, and Venetie.

ADF&G has conducted subsistence research in a number of eastern Interior communities, the results of which are documented in the ADF&G Division of Subsistence's Technical Paper series and the Community Subsistence Information System (CSIS). In 2004, ADF&G conducted subsistence harvest surveys documenting household harvests of non-salmon fish and large and small land mammals in Eagle, Northway, Tetlin, Tok, Tanacross, Dot Lake, Manley Hot Springs, Minto, and Nenana. Similarly, ADF&G documented non-salmon fish harvests in 2005 in Beaver, Birch Creek, Central, Circle, and Fort Yukon, preliminary results of which are available in the CSIS. Older, but still relevant subsistence harvest information also is available in the CSIS and Technical Paper series for many of the communities located in the planning area.

Of particular importance in this area are potential impacts to authorized uses of Fortymile caribou; moose populations of Game Management Units 12, 20, and 25; Pacific salmon species; and resident fish such as whitefish and northern pike. Useful information for each community that uses or has used BLM lands for subsistence activities includes: specific geographic areas involved and the extent of use for particular seasonal harvest activities (vs. other lands); species harvested; seasonality of use; and how the area is accessed for subsistence harvest activities. Comparable data probably are not readily available in published sources for all communities, but the ADF&G Division of Subsistence technical paper series and Community Profile Database are good starting points.

a portion of the upper Black river that I know the best is the watershed of the Salmon Fork of the Black River. It happens to be a very rich area in terms of wildlife and fish. It provides subsistence base for people of Chalkyitsik. I think that those things need to be taken into consideration in developing a management plan for the Salmon Fork of the Black River.

They don't call it the Salmon Fork for no nothing. It is a significant spawning stream for two species of salmon and a vestigial run or at least historically for king salmon as well. I have seen king salmon in there and there is historic photographic documentation of king salmon spawning populations in the Salmon Fork of the Black River. Currently, to my knowledge the population of King salmon is vestigial or very low but that does not mean it cannot rebound. The fall chum run is very strong and the people of Chalkyitsik depend utterly on that fall chum run to meet some of their subsistence needs. Later in the fall when the ice is on the river people in Chalkyitsik set nets under the ice for coho salmon and that is real important too. Those fish that they are catching there in Chalkyitsik are spawning in the Salmon Fork, in the main stem as well as a salmon spawning hole on a tributary of a tributary of the Salmon Fork. In fact, the native name for that salmon spawning hole is the same name that the salmon spawning hole on Fishing Branch at the headwaters of the Porcupine is known by.

If you look at those two salmon spawning holes [Salmon Fork of the Black River and Fishing Branch, Canada] they are in the same geographic area with similar hydrology and similar geology, where there is an upwelling under a bluff and the water remains unfrozen all winter long. Salmon spawn in there until late into December and there is wildlife, furbearers and bears that are plentiful in those locations, both of those locations. So historically, those have both have been extremely important areas for the native people and as far as maintaining those populations, I think it is absolutely critical that the salmon spawning hole in Alaska receives similar protection to the protection that the Canadians and the First Nation of Old Crow has provided to the salmon spawning hole over in the Canadian side.

It used to be that people could just go out and do whatever they wanted and they were just kind of left alone. Some of them stayed and some of them left but generally the social structure is set up that people come into the land, they live that way for a limited amount of time. They have kids. They decide to move to another town or bigger town and they leave. Sometimes they stay. Most of them end up leaving but the way things are set up now, there's no ability for the new young couple to come in and do that lifestyle and continue that lifestyle and that's critical part of Alaska. We are not providing for young people to go out and try and live that lifestyle anymore. That's really important. I think that really needs to be emphasized in the subsistence aspect of this.

My son just turned one and I would really like him to be able to go out and go trapping and put in a fish net and fish in the summer and have fish to catch and be able to go out and put up a cabin somewhere if he wants -- if he chooses to do that and like Andy is saying, it's sort of a slow erosion over time.

We just want to go out there. We are not going to do anything harmful. We want some opportunity. There are a lot of young couples that come up here in the summer and they have this dream of coming to Alaska and living out in the woods. It is hard work. Most of them don't last, maybe a year, maybe two. But it's a lifetime dream of theirs and the skills that they gain make them better people when they get involved in other things. The people that are involved in making policies, if they've lived that lifestyle they have a very good understanding of what it takes to live that way. I think they do a very good job of bringing that human element into the discussion on regulations and a very real view of what it takes to go out there and do it. It's easy to say, oh, we got to close this off because we can't allow people to come in here and destroy the land. But, when you look at what it takes to go out there and do it and most [young] people have no economic resources or infrastructure behind them. They're just out there eking their way through it and some of them are good enough to do it and last and a lot of them don't. But it is a really important cultural aspect to at least have the opportunity to go out and give it a shot.

The Black River area is vital for subsistence (salmon spawning, moose calving and migration route, northern pike, grayling, etc.). Most people hunt moose up there in the fall.

The Black River area is pretty much untouched by man. We know there are moose in that area and if we really need it, we would go that far to hunt in the winter.

Doyon is supposed to be protecting our land, so is BLM. You're supposed to be looking after the well being of the peoples and that Black River down there, that runs clear. I can go down there and have a shot of that water. I swim in it all summer long. It breaks my heart to see this happen and it makes me feel like that our voice is not strong enough and that you guys are going to come in here and step on our land and walk right over us regardless of it and use Congress and the Statehood to hide behind it and it removes the responsibility from either of you guys.

<p>What is the highest level of protection that BLM can put on the Black River area? What will you guys do to protect this land? We are stewards of the land. We live here. We hunt here. We eat here. What are you guys going to do to protect that? What are you going to do to protect our water from running brown? I'd like to know them answers and I'd like to see really this area protected. I mean, completely protected.</p>
<p>How is BLM approaching subsistence study like you guys are going to do in the EIS. Are you going to go out and do new studies?</p>
<p>What's scope of studies is the BLM required to do on subsistence, on BLM land? What is the BLM plan for subsistence?</p>
<p>There are some sites of importance in the Black River, to identify graveyard sites along the river, animal habitat, nesting grounds, historic sites, minerals, fishery use areas that we've been using for long as we've been here. Scenic areas, fishing and hunting areas, subsistence – what we live on, Salmon Village (indiscernible) up here, salmon spawning areas except for the Salmon Fork and the Black River, Chalkyitsik's use of them (indiscernible), historic trails and all the trails that were built a long time ago and they're still around there but it's – and historic structures.</p>
<p>There is a lot of subsistence fishing and hunting in the Central area. Caribou and stuff like that. We have a big turn out when caribou season opens. In November they hunt on federal ground. Federal mining claims are considered federal land and are covered under the federal subsistence regulations. A lot of people hunt caribou off of Birch Creek. They migrate through there in November.</p>
<p>The BLM does not have up-to-date and valuable studies or inventories of the ecological values of the Black River region. To ensure that informed decisions are made, I ask the BLM to make the proper evaluations and utilize local Traditional Ecological Knowledge.</p>
<p>The Black River is a highly utilized subsistence hunting and fishing area for local villages and rural residents of the region. This area should be offered lasting protection to ensure these opportunities exist.</p>

# Acronyms

<b>ACEC:</b>	Area of Critical Environmental Concern
<b>ADF&amp;G:</b>	Alaska Department of Fish and Game
<b>ANCSA:</b>	Alaska Native Claims Settlement Act
<b>ANILCA:</b>	Alaska National Interest Lands Conservation Act
<b>BLM:</b>	Bureau of Land Management
<b>CFR:</b>	Code of Federal Regulations
<b>CSIS:</b>	Community Subsistence Information System
<b>DNR:</b>	Alaska Department of Natural Resources
<b>DOI:</b>	Department of the Interior
<b>EIS:</b>	Environmental Impact Statement
<b>EPA:</b>	Environmental Protection Agency
<b>FR:</b>	Federal Register
<b>FLPMA:</b>	Federal Land Policy and Management Act
<b>FO:</b>	Field Office
<b>FWS:</b>	U.S. Fish and Wildlife Service
<b>MFP:</b>	Management Framework Plan
<b>NCA:</b>	National Conservation Area
<b>NEPA:</b>	National Environmental Policy Act
<b>NOI:</b>	Notice of Intent
<b>NMFS:</b>	National Marine Fisheries Service
<b>NPS:</b>	National Park Service
<b>NR:</b>	National River
<b>NRA:</b>	National Recreation Area

**NRT:**

National Recreation Trail

**NWR:**

National Wildlife Refuge

**NWSR:**

National Wild and Scenic River

**OHV:**

Off-road vehicle

**ORV:**

Outstandingly remarkable value

**ROD:**

Record of Decision

**RMP:**

Resource Management Plan

**RNA:**

Research Natural Area

**ROW:**

right-of-way

**R.S.:**

Revised Statute (as in R.S. 2477)

**T&E:**

Threatened and Endangered

**VRM:**

Visual Resource Management

**WMNRA:**

White Mountains National Recreation Area

**WSR:**

Wild and scenic river

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