



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

## Department of Natural Resources

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April 11, 2013

Lenore Heppler  
Eastern Interior Field Manager  
Bureau of Land Management  
1150 University Avenue  
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Dear Ms. Heppler:

The Citizens' Advisory Commission on Federal Areas (CACFA) reviewed the Eastern Interior Proposed Resource Management Plan (RMP) and Draft Environmental Impact Statement (DEIS) as well as the Supplement on Hardrock Mineral Leasing in the White Mountains National Recreation Area (NRA). We offer the following comments for consideration by the Bureau of Land Management (BLM) in finalizing the management plan for this area.

### **Public Participation**

This Commission commends the Eastern Interior Field Office and the planning team for the extensive public outreach and participation program associated with all phases of this planning effort. The initial 120 day scoping period was extended an additional 45 days. Eight public open house scoping meetings were held during that time. The original 150 day public comment and review period for the proposed RMP and DEIS, while essential for a plan of this size and complexity, and the extensive public meeting schedule, were adequate. We also appreciate the willingness of you and other members of the planning staff to provide updates and briefings for this Commission, other State agencies, interest groups and organizations when asked.

These same opportunities for public participation were subsequently extended into the review and comment period for the White Mountains NRA Mineral Leasing Supplement. The additional time BLM needed to prepare and review the Supplement, extending the public comment period another 8 months, was a much needed bonus. Unfortunately, we are concerned that the effectiveness of this unprecedented public outreach may have been undercut by the planning document itself.

### **Structure and Complexity of the RMP/DEIS**

When the BLM made the decision to prepare a single resource management plan and environmental document for the Eastern Interior planning area, this Commission was concerned that the result would be an overly lengthy and complex document that would be difficult for the public to understand and for the BLM to implement effectively. We were also concerned that

including the ANILCA designated Birch Creek, Beaver Creek and Fortymile Wild and Scenic Rivers (WSR), the Steese National Conservation Area (NCA) and the White Mountains NRA in the same resource management plan with several millions of acres of undesignated BLM lands could result in the inadequate recognition of key management provisions applicable to these ANILCA designated areas.

Even with considerable experience in reviewing and analyzing planning and environmental documents, Commission members and staff, as well as other State agency personnel, found the plan extremely challenging. For many members of the public the task of reviewing such a large and complex plan was daunting and even insurmountable. A primary goal of every agency's planning effort should be to engage the public in the planning process in order to gain acceptance of the resulting plan and management strategies. We suggest that crafting a document that can be readily understood and digested by the public is the best way to achieve that goal.

Plans should present and interpret important information on a level where it can be understood by the average person who has an interest in using and enjoying the wide range of resources available on Federal public lands. With the creation of ever larger and more complex plans, agencies are approaching a point where they are "planning" out their most important partner in the management of our public lands – the individual public user.

For the Eastern Interior RMP/DEIS, dividing the planning area into four subunits helps only to a point. However, at more than 1,200 pages, with four alternatives for each subunit, more than 100 maps, multiple resource categories and programs analyzed under each of the alternatives for each subunit, and a virtually limitless number and variety of possible management scenarios, the plan was still challenging to understand. Comparing the alternatives was very complicated, although the tables in Chapter 2 - *Summary of Action Alternatives* – for each subunit do provide some help. The individual summaries for the 4 subunits also helped considerably. Nevertheless, this has proven to be a difficult plan to review and understand.

Our critique of the structure and complexity of the plan is not a criticism of the Eastern Interior planning team. We are familiar with the array of handbooks, manuals, instruction memos and guidelines that dictate the format and content of land and resource management plans and environmental documents. We also appreciate that agency planners are given little latitude in deviating from the formal template for how information must be presented and analyzed in a plan. Unfortunately, this results in management plans and documents that have grown in size and complexity to the point of being unmanageable and incomprehensible to non-professionals.

### **Commission Supports Alternative D**

After completing our review of the alternatives in the proposed RMP/DEIS, the Commission has determined that Alternative D, with some adjustments, will provide a reasonable balance of resource protection, opportunities for resource development, subsistence uses, access and travel management, recreation, including hunting and fishing and scientific research. It is also consistent, again with some adjustments, with the provisions of ANILCA that designated the Steese NCA, White Mountains NRA, Birch Creek, Beaver Creek and Fortymile WSR.

## Withdrawals

As the RMP (pg. 353) points out, virtually all of the BLM managed lands within the planning area are under some type of withdrawal pursuant to the Alaska Native Claims Settlement Act (ANCSA), Alaska National Interest Lands Conservation Act (ANILCA), the Wild and Scenic Rivers Act or other federal law. The Commission supports revoking or modifying the remaining ANCSA (17)(d)(1) withdrawals, as well as other withdrawals that are no longer necessary, within the Eastern Interior planning area.

The issue of withdrawals under ANCSA, ANILCA or a long list of Public Land Orders (PLO) is complicated, particularly when there are frequently several layers of withdrawals over the same acre of land. The BLM addressed the issue of the ANCSA 17(d)(1) withdrawals in a 2006 report to Congress. This report was required by Section 207 of the Alaska Land Transfer Acceleration Act (Public Law 108-452). That report, which we note is not in the references cited for this RMP/DEIS, summarized the issues as follows:

*The ANCSA withdrawals were intended to protect resources, to prevent encumbrances that could interfere with State or Native entitlements, and to study lands for further inclusion into conservation units. In the early 1970s when the lands were withdrawn under Section 17(d)(1) and (d)(2) of the ANCSA, there were few regulations to oversee the development of the public lands and protect important natural resources. Since then Congress has passed significant legislation for the orderly development of the public lands and to protect the environment from adverse impacts. The BLM has 1) developed extensive oil and gas lease stipulations, required operating procedures (ROPs), and surface management regulations for miners, which are now in place and sufficient to assess and protect the resources in most situations, 2) the selection period is over and the BLM is completing conveyance of State and Native entitlements, and 3) more than 102,097,900 acres have been withdrawn by ANILCA and incorporated into CSUs sufficient to protect those lands.*

*In summary, there are more than 158,958,000 acres of d-1 withdrawals in Alaska. Many of these d-1 withdrawals have outlived their original purpose. It may be appropriate to lift many of d-1 withdrawals and the most effective and preferred means in managing this process is through BLM's land use planning process. Approximately 152,181,400 acres or 95% of these withdrawals could be lifted consistent with the protection of the public's interest. Many of these lands would remain segregated or require additional administrative procedures (NEPA/decisional) before any development can take place. Because remaining segregations overlap the d-1 withdrawals, lifting these withdrawals would provide immediate entry on only 21,459,700 acres or 14% of the d-1s recommended to be lifted. A majority of these lands have low to medium locatable mineral potential with a few scattered areas of high potential. Very few of these lands have any known potential for coal, oil or gas. Most lands with medium to high locatable mineral potential, or known leasable mineral potential, were previously opened, or selected by the State of Alaska or Native corporations. This and more stringent requirements for managing development, means the original protections from the d-1 withdrawals are no longer critical for the protection of the public's interest. The d-1 withdrawals are an unnecessary encumbrance on the public land records complicating interpretation of the title records by the public. In contrast, it is apparent that the retention of approximately 6,776,600 acres of d-1 withdrawals is warranted to provide temporary*

*protection on specific sensitive areas. Maintenance of these withdrawals is appropriate until another withdrawal is put into place. (pgs. 5-6)*

At the time of the 2006 Report, there were a total of 6,758,000 acres of BLM managed d-1 withdrawals in what was designated as Area 2 in that report. This area appears to coincide with the boundaries of the Eastern Interior planning area. Approximately half of this acreage (3,154,500 acres) is selected by the State of Alaska or a Native Corporation. Since the report some of the selected lands have been conveyed.

The report recommended maintaining the d-1 withdrawals that overlap other withdrawals for Beaver Creek, Birch Creek and the Fortymile Wild and Scenic Rivers until “*a more appropriate withdrawal is put into place through the land use planning process.*” We do not agree that “a more appropriate withdrawal” is necessary, as the ANILCA withdrawal is more than adequate to protect the values of these rivers.

The report also recommends maintaining the d-1 withdrawals for the Steese NCA and the White Mountains NRA “*until their existing RMP’s are reviewed and updated to reflect current management objectives.*” Our analysis of Alternative D indicates that lifting the d-1 will provide for a reasonable level of use and development of the resources in these areas while protecting the other values, including recreation and the other purpose for which the areas were designated.

In reviewing the plan, we found the fragmented discussions and sometimes disjointed proposals regarding existing and possible future withdrawals under the various alternatives difficult to follow. In some instances, a reference is made to retaining existing withdrawals and in others it appears that new or additional withdrawals are being proposed. The entire issue of withdrawals will require further clarification in the final plan and/or record(s) of decision.

For example, for the Steese subunit, under Alternative D (pg. 132) the plan proposes to retain the ANILCA withdrawal on approximately 550,000 acres in the Steese NCA, to keep that portion of the NCA closed to locatable mineral entry and mineral leasing. In addition, the plan proposes recommending opening approximately 646,000 acres to locatable mineral entry and leasing in the Steese NCA, pursuant to ANILCA 402(b), but does not inform the reader that a modification to PLO 5180 would be required for both actions. PLO 5180 is mentioned briefly in Section 2.6.1.2.6 (pg. 100) as applying to the Steese subunit, but the actual steps necessary to make the proposed changes are not explained until Section 3.3.8 *Withdrawals* (pg. 354).

Alternative D (pg. 132) also proposes that: “*Outside of the NCA, approximately 1,600 acres would be closed to locatable mineral entry, to include lands within the Birch WSR Corridor that are not withdrawn under ANILCA or the WSR Act, for the purposes of protecting the Outstandingly Remarkable Values of the river.*”

It further states: “*Outside of the NCA, approximately 15,200 acres would be closed to locatable mineral entry in those parts of Birch Creek and Pinnell Mountain Trail RMZs that are not withdrawn under ANILCA.*” This would include 15,130 acres in the Birch Creek RMZ that are adjacent to the Birch Creek WSR Corridor.

It is not clear if the action to close the 1,600 acres or the 15,200 acres represents new withdrawals or the retention of an existing withdrawal(s). The Commission would not support

new withdrawals adjacent to the river corridor, as the corridor boundaries are established to provide protection for the river. Additionally, we are unaware of any lands within the designated WSR corridor that are not already withdrawn under ANILCA. Section 606 of ANILCA withdrew “...*the minerals in Federal lands which constitute the bed or bank or are situated within one-half mile of the bank of any river designated a wild river...*”

In addition to the ANILCA withdrawal, PLO 5179 withdrew all lands within one mile of the bank of Birch Creek WSR from all forms of appropriation under the public land laws and from location and entry under the mining laws and from mineral leasing under the mineral leasing laws. The original Birch Creek River Management Plan (1983) proposed modification of this PLO “*to describe only those lands included in the final boundary of the wild river corridor, and that the land order be revoked for those lands not included within this boundary. This proposal in combination with one-half mile withdrawal established by Section 606 of ANILC will maintain the withdrawal of all federal lands within the final river corridor boundary.*”

A similar example is found in the Fortymile subunit, Alternative D would retain the existing withdrawals under ANILCA and administered pursuant to the Wild and Scenic Rivers Act. The plan states in Section 2.4.2.8, *Management Common to all Subunits and All Action Alternatives - Withdrawals* (pg. 57) states that “*wild river segments within one-half mile of the bed and bank of the rivers are withdrawn from all forms of appropriation under the mining laws and from operation of the mineral leasing laws.*”

The plan (pg. 88) states that approximately 51,000 acres would be closed to locatable mineral entry in the subunit, including the areas within one-half mile of all identified mineral licks, as well as “*The wild segments of the Fortymile Wild and Scenic River Corridor, to include any lands within the river corridor that are not withdrawn under ANILCA and the WSR Act for the purposes of protecting the Outstandingly Remarkable Values of the river.*” Also to be closed to locatable mineral entry is “*The portion of the ‘recreational segment (Wade Creek) of the Fortymile WSR Corridor, below the dredge...*”

As with the Birch Creek WSR Corridor, the withdrawal in ANILCA Section 606 applies to the wild segments of the Fortymile and PLO 5179 applies to the entire corridor. The 1983 River Management Plan for the Fortymile contains similar proposals for modifying PLO 5179 and the effect of the ANILCA section 606 withdrawals on the WSR corridor. The Eastern Interior plan does not state which lands within the corridor are not included in the ANILCA withdrawal. Again, it is not clear if this proposed action represents the retention of the existing withdrawals or a new one. In addition, the final plan should specify the acreage figures for each of the proposed closure areas, i.e.: the number of acres affected around the mineral licks, the wild river segment of the corridor and the recreational segment at Wade Creek.

The withdrawals under ANILCA and the Wild & Scenic Rivers Act apply only to the minerals in Federal lands which are part of the system and constitute the bed or bank or are situated within one-half mile of the bank of a wild river. In the case of a navigable river, which includes some wild river segments of the Fortymile under previous navigability determinations and may include other segments as well, the river bed belongs to the State of Alaska. Similarly, the river bed of a navigable segment of a river would not be subject to existing or future withdrawals under the authorities of ANILCA or the WSR Act, neither are State owned submerged lands or uplands part of the WSR corridor.

Finally, should any of the proposals in the plan constitute new closures or withdrawals of the planning area to mineral entry or the application of the public land laws, ANILCA Section 1326(a) applies. This sections states:

*“No future executive branch action which withdraws more than five thousand acres, in the aggregate, of public lands within the State of Alaska shall be effective except by compliance with this subsection. To the extent authorized by existing law, the President or the Secretary may withdraw public lands in the State of Alaska exceeding five thousand acres in the aggregate, which withdrawal shall not become effective until notice is provided in the Federal Register and to both Houses of Congress. Such withdrawal shall terminate unless Congress passes a joint resolution of approval within one year after the notice of such withdrawal has been submitted to Congress.”*

Having already criticized the size and complexity of the plan, we are reluctant to suggest inclusion of any additional material in the final. However, we suggest the BLM consider including a separate appendix that address the issue of withdrawals, how existing withdrawals will be handled in the various alternatives and whether new or additional withdrawals are proposed in one or more of the alternatives. More clarity on the issue of withdrawals is needed in the final plan.

The Commission also encourages the BLM, based on the decisions and recommendations made in the Records of Decision for this planning area with regard to withdrawals to actively pursue implementation of those recommendations with the Secretary of the Interior. Previous resource management plans for East Alaska, Kobuk-Seward and Bay planning areas have recommended lifting the d-1 withdrawals. To our knowledge the Secretary has taken no action on those recommendations. The Alaska State Office should work through the national office and the Director of the BLM to complete the process of lifting these withdrawals that have outlived their purpose.

### **Wilderness Characteristics**

The Commission appreciates that the BLM planning guidelines and policy require that a wilderness characteristics inventory be conducted for this planning area. It is no surprise that most of the area was found to possess wilderness characteristics. Although Alternative D, of the 3 action alternatives, has the smallest percentage of acreage that would be managed to maintain wilderness character, we suggest further reductions in the total acreage.

We support the decision under Alternative D to not explicitly manage any of the Black River subunit to maintain wilderness character.

In the Fortymile subunit, the proposal to maintain the wilderness character of the lands within the designated river corridor for the Joseph Creek segment of the Fortymile WSR is appropriate, given its designation as a wild segment.

For the Steese subunit, we support maintaining wilderness characteristics only within that segment of the Birch Creek WSR corridor that lies within the Steese NCA. Managing for wilderness characteristics in other portions of the Steese could create conflicts between that

management strategy and the ANILCA mandate to manage the NCA “*within a framework of a program of multiple use and sustained yield and for the maintenance of environmental quality.*”

In the White Mountains subunit, we suggest reducing the acreage on which wilderness characteristics would be maintained to those lands within the Beaver Creek WSR corridor.

The plan recognizes that ANILCA allows certain uses in Wilderness areas in Alaska and that since these uses are allowed in designated wilderness in Alaska these uses could also occur on lands with wilderness characteristics while still maintaining those characteristics. The Commission appreciates the BLM recognition of the ANILCA authorizations, as required under BLM Manual 6320.

We are compelled to point out, however, that within the ANILCA designated areas (Steese NCA, White Mountains NRA, Birch Creek, Beaver Creek and Fortymile WSR) uses such as snowmachine and motorboat use, aircraft landings, temporary structures for the taking of fish and wildlife and public use cabins should not be subject to any restrictions based on an administrative determination that an area has wilderness characteristics. The criteria in ANILCA, particularly for restricting snowmachine, motorboat and aircraft use is based on a finding that the use would be detrimental to the resource values of the area. Because each of these ANILCA areas were designated for specific values and purposes, any identified “wilderness characteristics” would only be a part of the determination process for implementing closure of an area or restriction of these uses.

### **Wild and Scenic River Review**

The Commission supports the finding in Alternative D that no rivers in any of the subunits be recommended as suitable for designation under the Wild and Scenic Rivers Act.

While we support the finding, we repeat our longstanding opposition to agencies conducting eligibility and suitability reviews or studies of rivers for the purpose of recommending their designation as wild and scenic rivers. Inclusion of these reviews is inconsistent with the provisions of Section 1326(b) of ANILCA, which states:

*“No further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, national conservation area, or for related or similar purposes shall be conducted unless authorized by this Act or further Act of Congress.”*

By definition, a wild and scenic river is a conservation system unit and any study of rivers within the Eastern Interior Planning Area for possible designation is a violation of Section 1326(b). As such, any wild and scenic river suitability/eligibility review and possible recommendation for designation violates both the letter and the intent of this section of ANILCA and should not be included in the final RMP under any of the alternatives.

### **Access and Travel Management**

Access and travel management on the BLM managed lands in the Eastern Interior Planning Area will affect a greater segment of the public than any other issue. We have already discussed

ANILCA protected access means (snowmachines, motorboats, airplanes and non-motorized surface transportation) and the requirements for restricting their use in the ANILCA designated areas. We note that the plan recognizes that prior to restricting access to the ANILCA units; the procedures found in 43 CFR 36.11(h) must be followed.

The 2012 BLM *Alaska Long Range Transportation Plan* recognizes the importance of access in rural Alaska:

*“Not only are trails the predominant transportation network within BLM lands, they are of great importance to various user groups for recreation, subsistence, permitted commerce, and daily travel. For some remote communities, winter trails are the primary means of accessing neighboring communities, and the transportation of goods and services where no constructed roads exist. For these communities, winter trails are not recreational, but the primary means of overland transportation and commerce. Trails are also significant travel resources for participating in subsistence related activities by connecting villages to remote reaches of BLM lands. Trails support numerous modes of travel, which are influenced by seasonal conditions. Trails support travel by OHVs, hiking, horses, and bikes in the summer, and snowmobiles, dogsleds, and cross-country skiing in the winter.”* (BLM Alaska Long Range Transportation Plan, section 2.1 Trails, p. 11-12)

The *BLM Alaska Long Range Transportation Plan* has a priority list and a schedule for completion of Travel Management Plans (Appendix A, pg. 1.); and a list of transportation assets, including 24 named roads and 37 named trails in the Eastern Interior planning area (Appendix C). Our review found that only about half of these trails identified by name on the maps in the plan. Most of the identified trails are in the White Mountains subunit, with a few in the Steese subunit.

The *BLM Alaska Long Range Transportation Plan* (pg. 2) also points out: *“A formal documented BLM transportation network is needed for all levels of planning and would greatly improve the management of impacts through comprehensive travel and transportation management and unit-level transportation management plans.”*

We understand that these transportation assets, including roads, primitive roads and trails, are not fully inventoried. However, many of these roads and trails are inventoried and the absence of information such as trail names on the maps found in the plan creates confusion. Including this information, where it is available, in the final plan would be helpful to the public. We particularly note that quite a few trails are shown on the maps for the Steese subunit, but almost none are identified by name.

The Eastern Interior RMP contains a Travel Management Plan for the White Mountains subunit. For this subunit it is appropriate to include travel management proposals in the range of alternatives. For the Steese, Fortymile, and Upper Black River subunits, final decisions on travel management under any of the alternatives should be deferred until a Comprehensive Travel Management Plan has been completed. This is particularly true for any alternative that would place limits beyond those already in effect under the existing resource management plans. For these units, we suggest Alternative A, the No-Action alternative, be adopted until further definition of the asset can be achieved. There is no functional way to apply restrictions and



limitations on a network of trails and roads in advance of all the information being gathered, evaluated and presented.

We suggest inclusion of the “*2009 Alaska Travel Management Guide*” and “*BLM Land Use Planning Relationship to Travel Management Planning*” found in Appendix B of the “*BLM Alaska Long Range Transportation Plan*” in the list of reference materials.

### **Fortymile Subunit**

Currently in the Fortymile subunit there are no designations for OHV use outside of the Fortymile WSR Corridor where vehicular traffic is allowed only on established trails. The existing trail network has never been defined. (Section 2.5.1.2.5, p.63-64) As trails are the main delivery method for recreation and other access needs in this area, designation of final boundaries and management guidelines for Recreation Management Zones (RMZ), Recreation Opportunity Spectrum (ROS) Settings, OHV Designations and Travel Management Zones should be delayed until the Travel Management Plan can be completed. Interim Travel Management Prescriptions along with the Fortymile River Management Plan should be adopted.

### **Steese Subunit**

The current OHV area designation for the Steese subunit is limited with the exception of two Research Natural Areas, Mt. Prindle and Big Windy Hot Springs, which are closed to OHV use. The subunit is divided into Primitive and Semi-Primitive Motorized and Motorized Special Management Areas with the exception of the Pinnell Mountain National Recreation Trail, which is closed to motorized uses, and Birch Creek WSR, where motorized uses are allowed in specific circumstances. (Section 2.6.1.2.5, p. 99) A map of existing routes for the Steese subunit can be found on Map 54 where trails are depicted but not labeled. We agree with the statement that, “*It is not practical to define or delineate a comprehensive travel management network for the Steese subunit in this plan due to the incomplete route data...*” (Section 2.6.1.2.5, p. 108) Therefore, until this data is collected, evaluated and made available, further designations should be delayed until a Comprehensive Travel Management Plan can be completed.

### **Upper Black River Subunit**

As there are no existing land use plans for the Upper Black River subunit, there are no OHV designations and the use of motorized vehicles, mechanized equipment, motorized water craft and aircraft is currently unrestricted. (Section 2.7.1.2.5, p. 139) Current OHV use is reported as low due to the remoteness of the area; and there are no reported negative impacts from OHV uses in this subunit. There is no need to further restrict what little access this subunit receives by applying OHV weight restrictions unless indicated.

### **White Mountains Subunit**

This is the only subunit for which a Comprehensive Travel Management Plan has been prepared. We note that in the discussion of travel management for the other subunits that include ANILCA designated units, the plan acknowledges that the closure procedures under 43 CFR 36.11(h) would be followed to implement any restrictions to snowmachine, motorboat and airplane access. We find no recognition of this procedure in the White Mountains Travel

Management Plan. That plan refers to the temporary emergency closures under 43 CFR 8341.2, which may apply, however, as with the ANILCA portions of the other subunits, any permanent restrictions or regulations must follow the procedures under 43 CFR 36.11(h).

### **Designation of Special Recreation Management Areas**

The Commission does not support the designation of Special Recreation Management Areas (SRMA). Each proposed SRMA includes one or more ANILCA designated unit(s). These ANILCA units were created for various purposes, to provide for certain activities and to protect a range of resources. Recreation was certainly one of the purposes for which these units were created, but it is not the only purpose or, even in the case of the White Mountains NRA, the primary purpose. In addition, the three Wild and Scenic Rivers and the Steese NCA are components of the National Landscape Conservation System. Adding another administrative designation on top of the existing statutory designations serves no real purpose and may actually detract from the mandated purposes for which the areas are to be managed. The Resource Management Plan, travel management plans, along with other BLM management guidelines are more than adequate to both manage public uses of these areas and protect their resources and values. A Special Recreation Management Area Plan, such as the one prepared for the Delta Wild and Scenic River would serve no real purpose.

### **White Mountains Mineral Leasing**

The Commission fully supports the decision to prepare a supplement to the RMP to examine the possibility of mineral leasing in the White Mountains NRA. Examining this issue was an essential part of this planning process in light of the management provisions in ANILCA. Our support of Alternative D includes providing the opportunity for future mineral leasing in this area. We are aware of the concerns that many members of the public have about mineral leasing in this popular area. However, Congress clearly intended for the possibility of mineral leasing to be considered. The BLM and the Secretary of the Interior should objectively examine the issue.

The Commission appreciates the opportunity to comment and we would like to thank you and your staff again for your time over the last 4 years to meet with this Commission and the public. We hope you find these comments constructive and helpful in finalizing this plan. Please contact us if you have questions or if we can clarify any of our comments.

Sincerely,



Stan Leaphart  
Executive Director

cc: Governor Sean Parnell  
Daniel Sullivan, Department of Natural Resources  
Sue Magee, State ANILCA Program Coordinator  
Samantha Carroll, Office of Project Management and Permitting