

# STATE OF ALASKA

JAY S. HAMMOND, GOVERNOR

## DEPARTMENT OF FISH AND GAME

333 RASPBERRY ROAD  
ANCHORAGE, ALASKA 99502

12 January 1982

Carl D. Johnson  
District Manager  
Fairbanks District Office  
P. O. Box 1150  
Fairbanks, Alaska 99707

Dear Mr. Johnson:

Thank you for the opportunity for the State of Alaska to participate in the issues scoping phase of your planning of the Steese National Conservation Area, White Mountains Recreation Area, Birch Creek and Beaver Creek Wild and Scenic Rivers.

Attached is a Draft Issues List prepared by State agency representatives for the four federal agencies to address in ANILCA conservation unit planning. The list is subject to further State review and modifications; therefore, we look forward to working with you to resolve any conflicts prior to finalization.

We distributed the issues handout, which you provided, to the State conservation planning representatives for review. The following is our tentative response, subject to future modifications and additions as the plans develop:

1. The issues scoping packet provided by the Bureau of Land Management had insufficient information about the areas in question for some agencies to adequately respond. They also felt that the time allowed for comment was too short to allow acquisition of more detailed information. Considering the vast size of the area involved, more complete descriptions of the resources of the areas are requested in order to make informed comments.
2. Several agencies expressed varying concerns regarding access. The attached Draft Issues List provides the State's tentative position on this issue. Additionally, the Alaska Department of Commerce and Economic Development is specifically concerned about the potential for the plans to unilaterally limit resource product development and surface transportation access to resources in and through the units. The Alaska Department of Natural Resources requests that access to State lands adjoining the Bureau of Land Management units be guaranteed, except where other plans for management are agreed to by the State.

3. The waterways which flow across a conservation unit and adjoining State land are considered highly important from recreation, access and habitat standpoints. Therefore the Alaska Department of Natural Resources requests that continuity of management be established along these waterways, regardless of ownership.
4. Several complaints were received that the items listed as issues in the Bureau of Land Management scoping document were too broad to be adequately addressed. Rather than attempting to address the issues, it was requested that the following broad topics be added to the list to be addressed in the planning process:
  - a) habitat enhancement
  - b) oil and gas leasing and exploration
  - c) geophysical operations
  - d) mineral leasing
  - e) land trades
  - f) fish and wildlife research and management activities
  - g) hydroelectric facilities and utility corridors
  - h) land use policies affecting harvest of fish and wildlife
  - i) public access on leases and utility corridors
5. Provided that the State of Alaska meets the requirements of ANILCA Title VIII, the Boards of Fisheries and Game will define and regulate subsistence of fish and wildlife within conservation units. The Alaska Department of Fish and Game requests that the management plans address the effects of other resource uses on fish and wildlife resource uses, including subsistence activities. This includes the effects that land uses may have on fish and wildlife uses in areas adjacent to, or downstream of, the designated units, ie. water quality related to fishery resources. Caribou habitat protection and access to the Fortymile herd will also be important concerns of the Department's which should be addressed in the planning process.
6. The following comments specific to the White Mountains National Recreation Area should be addressed in the management plans:
  - a) It is recommended that this area be managed under a primitive recreation area policy rather than a developed one.
  - b) The development of recreational facilities in this area will increase human/wildlife conflicts, specifically bears.
  - c) Roads should remain open to all users, ie. mining roads for fishermen, hunters, trappers, and other recreationalists.
  - d) The development of recreational facilities may actually decrease the recreational qualities of the area and contribute to higher use levels than desirable.
  - e) With the development of recreational facilities there is a tendency to control wildfires. This may conflict with fire management for habitat of moose and other species.
  - f) The State is opposed to blanket restrictions on the use of ORV's and aircraft.

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- g) Fish and wildlife management goals may vary from area to area within the unit and should be a major factor in the development of land use policies with the Alaska Department of Fish and Game.
  - h) The Alaska Department of Fish and Game is concerned with mineral leasing and regulation of existing mining claims involving sheep habitat in the White Mountains and northern Steese areas. Because the sheep population is small and isolated, any habitat loss is critical. Therefore, the Department prefers to see no new leasing, and tight stipulations aimed at minimizing conflicts with sheep habitat, applied to existing mining activities in the area.
7. The Alaska Department of Fish and Game has the following specific concerns regarding the Steese National Conservation Area:
- a) Protection and management of caribou range: 1) prevent burning over large portions of winter range, and 2) avoid intensive development (roads, mining activities, etc.) in calving areas. It should be noted that fire on winter range is not necessarily bad, and the impact of burning depends on a number of factors including availability of alternate winter range, location of alternate ranges, desired human use of caribou while on various winter ranges, frequency of burning, and proportion of range burned.
  - b) The long-term impact of development such as roads and mineral extraction operations on caribou migration corridors.
  - c) Basically the same concerns expressed in #6 above.
8. Both Beaver and Birch Creeks are used, and/or occupied, by recreational and subsistence users for fishing, hunting, and trapping. Management of these Wild and Scenic Rivers should allow these users, and the methods and means used, to continue.
9. Any traditional access points within the Beaver and Birch Creek corridors to private or State lands, as well as to use the corridor, should be retained including the use of mechanized air, water, and land transportation.
10. Existing facilities (ie. cabins) within Beaver and Birch Creek corridors should be allowed to remain as provided in ANILCA Titles VIII and XIII.
11. Provisions should be made in the Bureau of Land Management's management plans to involve the State in future planning and revisions of the plans.

The State of Alaska's representatives wish to remind you that these are preliminary comments subject to future revisions. We also wish to plan an active role in the development of the management plans. Therefore, we look forward to the opportunity to work closely with the Bureau of Land Management during the entire planning process.

Sincerely,

  
Tina Cuning  
Acting Coordinator  
Conservation System Unit Planning