

CSU Planning Office
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267-2215

July 26, 1983

Carl Johnson
District Manager
Bureau of Land Management
P. O. Box 1150
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Dear Mr. Johnson:

The State Conservation System Unit (CSU) Contacts have completed their review of the Steese National Conservation Area and White Mountains National Recreation Area Land Use Plan Alternatives. Reviewers appreciated the plans' references to cooperative management with State agencies. However, the draft was often difficult to evaluate due to lack of detail. Hence, no preferred alternative was chosen.

Summaries of these plans were helpful for comparing alternatives but correlations between the summaries and the maps were somewhat confusing. Alternative evaluation was hindered by the lack of natural features on maps. Because of the proximity of these areas to the second largest population center in the state and the spectrum of oftentimes conflicting uses which could occur in the areas, it is important to indicate clearly how each alternative will affect various users in various areas. Detailed land use alternative maps, such as those available in the Bureau of Land Management (BLM) office, should be adapted for inclusion in these public briefing documents.

The plans do not clearly indicate BLM's management intentions for the areas. As an example, page 5 of the White Mountains plan states, "ANILCA [Alaska National Interest Lands Conservation Act] permanently closed the White Mountains National Recreation Area to mineral entry, location and patent under U. S. mining laws. Existing mining claims must be administered according to the provisions of Sec. 404 of ANILCA," yet alternatives B, C and D all suggest opening areas to mineral development. A similar discrepancy occurs in the Steese plan. ANILCA Sec. 404(b) states:

Any mining operation undertaken pursuant to this subsection, including but not limited to exploration, development, and extraction, shall be subject to such reasonable regulations as the Secretary may prescribe to assure that such operations will, to the maximum extent practicable, be consistent with protection of the scenic, scientific, cultural, and other resources of the Steese National Conservation Area or the White Mountains National Recreation Area or any affected conservation system units established or expanded by this Act.

The BLM should detail how they intend to carry out the mandates of ANILCA Sec. 404(b), Sec. 1312 and other applicable legislation.

Although there may be areas that might support mineral development with very little influence on local wildlife populations, undoubtedly there are other areas that should not be leased or areas that will require special mitigative requirements to avert major impacts from occurring. We are unable to evaluate such impacts adequately or to identify these areas at this time. Any decision to lease these lands, or any procedures to establish lease terms for these areas should be based on the outcome of the National Environmental Policy Act process. Therefore, we suggest that all future mineral lease activities be conducted independent of these plans under the normal BLM leasing process so as to allow the State the opportunity to review these actions separately and provide specific land use recommendations as they may apply.

ANILCA Sec. 401(b) states, " Special values to be considered in planning and management of the area (Steese) are: caribou range...". Although special wildlife management areas are provided in the White Mountains National Recreation Area (WMNRA) and part of the southern section of the Steese National Conservation Area (SNCA), no recognition is given to former caribou calving and summering areas in the upper drainages of Preacher Creek. During the late 1940's through the early 1960's, the section between Beaver Creek and Upper Preacher Creek was heavily used by the Fortymile Caribou Herd as calving and summering range. State wildlife management plans, currently scheduled for final revisions and implementation by early 1984, call for a population goal of 50,000 caribou for the Fortymile Herd, a significant increase over the current population of about 10-12,000. When this population goal is achieved, caribou will use range not currently utilized, probably including most of the WMNRA and SNCA. As caribou populations increase, their home ranges also increase to accommodate the larger numbers of animals. Any land use plan adopted should recognize this possibility and make the necessary accommodations.

We recognize Congress intended mining to occur in both areas; however, the legislation also specifically mentions protecting wildlife. Regardless of the alternative finally adopted, protection of wildlife habitat must be given a high priority. Although some habitat is not fully used at present, historical use has been documented and as populations increase, historically used habitat will again receive use.

Little or no mention of bears, either black or grizzly, is made in the drafts. We believe that consideration should be given to protecting their habitat. Consideration must also be given to the expected conflicts between development (mining, cabins, campers, and recreationists, etc.) and grizzly bears. Where developments have occurred bears are often shot in order to prevent potential bear depredations. Plans should recognize this fact and attempt to minimize its occurrence.

With the special management zones (Alternatives C and D), several wildlife use areas deserve special consideration and protection:

- 1) Sheep mineral licks, lambing areas, migration routes and winter range. Although some of these important use areas have been identified, others have not. Studies are currently underway to identify these important ranges. It will be necessary to collect several years' data before these areas of important habitat are identified. In the meanwhile, BLM should avoid land use commitments which may preclude the protection of valuable wildlife habitat.
- 2) Caribou migration routes, calving and post-calving aggregation areas. As with sheep, some of the areas currently in use have been identified, others have not.
- 3) Grizzly denning areas, important feeding sites, travel routes.
- 4) Peregrine nesting sites. Nearby feeding areas should also remain relatively undisturbed.

In previous correspondence regarding Steese/White Mountains planning activities, the State was concerned that resource use patterns in or near these National Areas be carefully evaluated vis-a-vis the kinds of development activities permitted therein. It is difficult to ascertain whether our concerns have been given consideration in preparation of the Alternatives--the summaries do not mention subsistence at all, while the complete plans address it only in very general terms. We wish to bring these additional matters to your attention.

- 1) We are uncertain what input was provided regarding these plans and land use alternatives by residents of Beaver, Birch Creek, Central, Circle and Fort Yukon.
- 2) The BLM planners should solicit further information from the Alaska Department of Fish and Game (ADF&G), Division of Subsistence. For your information, a report by Richard Caulfield is scheduled for release later this month. This report will illustrate subsistence uses of Birch and Beaver Creeks outside the Steese and White Mountains areas by some area residents.

- 3) It is unclear whether the Steese/White Mountains alternatives are in compliance with Section 810 of ANILCA. For example, as we have emphasized in previous comments, has consideration been given to the potential effects of mining activities within the Steese/White Mountains Areas on subsistence resources and harvesting outside these areas? Our points are that areas on Birch and Beaver Creek downstream from the Steese/White Mountains boundaries will be affected by activities occurring upstream, and these areas outside the Steese/White Mountains boundaries are used for resource harvesting activities.
- 4) Are planned or potential land uses within the Steese/White Mountains boundaries coordinated with the purposes for which the Yukon Flats National Wildlife Refuge has been established [see ANILCA, Sec. 302(9)(B)(i)]?
- 5) As examples of the ambiguous nature of sections addressing subsistence in the Land Use Plan Alternatives, we note these cases:
 - a. Subsistence Alternative C in each plan notes that "Human use of subsistence species will be facilitated by improved access." In fact, ease of access to resources increases pressure on resources and may have just the opposite effect on local users.
 - b. Steese Land Use Plan Alternative A for subsistence notes the importance of caribou and grayling as subsistence resources primarily outside unit boundaries and accords them "the same consideration as subsistence resources utilized within the unit." Whether or not sufficient protection to subsistence uses can be provided with "environmental assessments" and unspecified "enforcement surface management regulations" is unclear.

We recommend that BLM not narrow its scope in Steese/White Mountains Planning only to those areas within each unit. Certain development activities within will be felt in adjacent areas and may be disruptive to existing resource use patterns or to the objectives of other nearby areas. The BLM should work with the State and local governments in planning multiple access routes into the areas from the Steese and Dalton highways which will minimally impact these resource use patterns.

Future drafts should detail management intent for the areas and indicate how BLM will cooperate with adjacent land managers with regard to access, resource management and other important issues. Future drafts should also demonstrate a close cooperation with the State in planning for recreational use and management as is mandated by ANILCA Sec. 403.

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Thank you for the opportunity to review these plans. We look forward to working with you to improve these documents to fulfill the need of the resources and their users and the mandates of ANILCA.

Sincerely,

Dennis D. Kelso
Deputy Commissioner
Alaska Department of Fish and Game

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