



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

ANILCA Implementation Program

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July 29, 2019

Marnie Graham, Glennallen Field Office Manager
Bureau of Land Management
Glennallen Field Office
Milepost 186.5 Glenn Highway
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Dear Ms. Graham:

The State of Alaska reviewed the BLM Supplemental Draft Environmental Impact Statement (SDEIS) for the Haines Amendment to the Ring of Fire Resource Management Plan (RMP). The following comments were provided by the Alaska Departments of Fish and Game and Natural Resources.

Alaska Department of Fish and Game (ADF&G)

We appreciate BLM's effort to understand potential negative effects on wildlife in the updated May 2019 Draft RMP A/SDEIS. We also note that the SDEIS clarifies that the plan would only apply to commercial recreational use of helicopters, and not to administrative or other use of helicopters, a concern we pointed out in our scoping comments. We provide the following comments.

Wildlife Resources:

We have been studying mountain goat and brown bear habitat selection in the Haines area for many years. As a result, we provided the BLM with maps of important winter habitat modeled for mountain goats and denning brown bears (Maps 6, 8, and 9, Chapter 7.0) so that land managers can better understand tradeoffs among recreational and natural resources. For clarity, we will use the same habitat labels as those in the Draft RMP A/SDEIS. When we refer to "mountain goat winter habitat" or "brown bear winter habitat" this indicates areas in which our models predict that the relative probability of use by these species is high.

Mountain Goats:

The plan states that mountain goats are the "target" species for mitigation efforts. We use The Northern Wild Sheep and Goat Council (NWSGC) as a guiding document and synopsis of the current literature describing anthropogenic impacts to mountain goats. The NWSGC recommends that helicopter activity not occur within 1,500 m of occupied/suspected nursery groups from May 1 to June 15 or important winter range from November 15 to April 30 (Côté 1996, Hurley 2004, Cadsand 2012, Côté et al. 2013). However, the stipulations in the plan do not consistently follow these recommendations. The plan prohibits landing within 1,500 m of "known" mountain goat kidding areas but offers no restrictions on flights over or around known

kidding areas unless goats are “visible” (Table 2.1 and section 2.2.2 on pg. 14). The plan does not include any stipulations for “suspected” kidding areas as recommended by the NWSGC (Hurley 2004). Determining all known kidding habitat in the Planning area may not be feasible. We recommend that BLM apply the NWSGC guidelines to modeled kidding/nursery habitat predicted to have high relative probability of use (when this information becomes available for the Planning area).

Although the plan prohibits landings within mountain goat winter habitat, helicopters can land immediately adjacent to and fly 500 m above ground level (AGL) over mountain goat winter habitat without restrictions. This goes against the NWSGC recommended 1,500 m minimum buffer around winter habitat (Hurley 2004). The winter timing window (Dec. 1 to Apr. 15) for stipulations that apply to winter habitat in the plan is narrower than the NWSGC recommendations, which are to avoid helicopter activity with 1,500 m from winter habitat from Nov. 15 to April 30 (Hurley 2004). The plan also allows operators to fly 500 m AGL over visible mountain goats which is only one third of the recommended minimum distance (Hurley 2004). Our estimates of sightability during aerial surveys indicate that goats can be difficult to detect in certain types of terrain and are particularly difficult to see when camouflaged by snow. Therefore, helicopters could disturb overwintering mountain goats without the pilot becoming aware. One study found that mountain goats reacted to helicopter activity up to 48 hours after the disturbance occurred even when the goats couldn’t see the helicopter (Cadsand 2012), demonstrating that using visual observations of mountains goats may not be sufficient to protect this sensitive species.

Brown Bears:

Allowing helicopter activity near denning brown bears may have negative effects on brown bear populations. A study on Admiralty and Chichagof Islands found that bears denned between sea level and 3,904 ft. (mean 1,981 ft.) and noted that aircraft traffic may lower the suitability of brown bear denning habitat (Schoen et al. 1987). Brown bears on the Kenai denned in areas “isolated from human activity and development” which was consistent with other studies (Ciarniello et al. 2005, Elfström et al. 2008, Goldstein et al. 2010). Disturbance during the denning period can cause den abandonment which increases energy expenditure and reduces cub survival (Swenson et al. 1997, Linnell et al. 2000). Allowing helicopter landings that provide recreation access to habitats favored by denning brown bears poses a safety risk to skiers, which was demonstrated when a skier was mauled near the BLM South Block in spring of 2016. The Draft RMP A/SDEIS states that conservation benefits applied to mountain goats will also benefit brown bears because there is “much overlap” between mountain goat and brown bear winter habitats (Section 1.4, pg. 9). Despite the numerous measures intended to mitigate potential effects on mountain goat populations (e.g., adaptive management, disturbance buffers, timing windows), there is very little effort to mitigate effects on brown bears in the plan. No further analysis of impacts or attempts at mitigation were conducted for brown bears. While there is some overlap of habitat used by brown bears and mountain goats in winter, these species select very different terrain, clearly evidenced in the Draft RMP A/SDEIS (Map 8, page 103). In fact, of the 421 km² of brown bear denning habitat identified in the aerial survey area, 177 km² (42%) are not overlapped by winter goat habitat. In particular, brown bears extensively select dens in areas where mountain goats do not use winter habitat near Porcupine, Glacier, Cahoon, McKinley, Cottonwood, Summit, and Big Boulder creeks, and Little Salmon, Tsirku,

and Chilkoot rivers. In areas where brown bear and mountain goat winter habitat do not overlap, operators would be allowed the maximum authorized number of landings. Operators would also be allowed to fly over brown bear winter habitat without any restrictions. In cases where mountain goat and brown bear winter habitats overlap, no buffer is required unless the landings occur in “known mountain goat kidding areas” between May 1 and June 15 (Table 2.1, pg.14). If the operators are willing to land outside a 1,500 m buffer around mountain goat winter habitat, then they could be permitted to increase the number of allowable landings up to 5,500 in year 1 (alternative G) whether brown bear winter habitat occurs there or not.

In 2018 ADF&G began a 5-year research project to estimate abundance, obtain population demographic information, and determine habitat preferences for brown bears in Game Management Unit (GMU) 1D. Understanding spatial movement patterns and habitat preferences of brown bears will provide insights into species habitat requirements, areas where conflicts with humans exist, and allow assessment of the vulnerability of denning bears to disturbance.

Wolverines:

Harvest data and anecdotal reports indicate that wolverines occur in the Chilkat Valley region. Wolverines in Alaska are born between February and April. Natal dens are usually in snow caves at elevations from 984–4101 ft. (Magoun & Copeland 1998). Den abandonment after human disturbance at maternal dens has been documented (Copeland 1996). Habitat selection data from a study conducted in Berners Bay, near Juneau, indicated that wolverines selected for shrub and unvegetated habitats that were farther up slopes and covered in snow during winter (Lewis et al. 2012). Wolverines are among the most important scavengers of mountain goat overwinter mortalities in the Lynn Canal area (White et al. 2011, White, unpublished data), and in other areas where mountain goats are abundant (Lofroth et al. 2007).

Adaptive Management (pg. 102):

Given the known effects to goats from disturbance by helicopters, we understand BLM’s rationale for using population estimates and trends and adult:kid ratios as management indicators for the collaboration with the Department on adaptive management. While it is reasonable to use population indicators under the premise that a small or shrinking population may face higher consequences from disturbance than a large or stable population, we also point out that other factors also drive population changes and these factors may be unrelated to disturbance from helicopters. BLM suggests using soft and hard triggers (in addition to other mitigation measures) allowing managers to respond to changing population dynamics. However, none of the triggers include a minimum population size. It is important to include a minimum population size (or minimum survey count) in order to minimize the risk of extirpation of small populations. Simulation results indicate that smaller populations have a higher risk of extinction than larger populations, and that harvested populations with fewer than 70 mountain goats have a greater than 50% probability of decline or eventual extirpation (White et al. 2018, White & Levi, unpublished memo). The Department recommends BLM consult with us to assess viable population size, determine trigger cutoff values, the level of precision needed to detect whether triggers are met and investigate the efficacy of these population measures as this is a new strategy for mountain goat management in Southeast Alaska. The length of time required to conduct the necessary population simulations and compute estimates can be considerable depending on availability of staff and funding. The adoption of this plan by the BLM will require

a substantial time and financial commitment because the triggers have not been tested (i.e. specific trigger values have not been clearly biologically justified) and the analytical process has not been developed to calculate and assess these population measures. A flexible strategy for dealing with those scenarios should be included in the plan so these methods can be developed as the program is initiated.

Another limitation of the adaptive management approach is that the triggers depend on aerial surveys. These surveys require adequate flying weather, pilot and staff availability, and funding resources. The number of goats observed is influenced not only by population size but also survey conditions (i.e., weather, aircraft type, etc.). In the past ADF&G has conducted minimum counts with population estimates available only from areas with collared goats that allow for the estimation of sightability. We have developed models which enable estimation of actual population size using minimum count data collected during aerial surveys (White et al. 2016). However, this requires that resources be available to conduct the surveys. Aerial surveys have not been successfully conducted in some areas on an annual basis due to weather, funding, or other factors. Additionally, some portions of BLM land have not been prioritized for surveys because of low hunting pressure (i.e. ADF&G preferentially allocates limited aerial survey funding to areas with the highest hunting pressure). When surveys are not completed, an alternative approach should be considered.

Current Permit Stipulations (Section 2.2.2):

The plan states that all operations “will maintain a 500-meter separation distance from...mountain goat, brown and black bears, wolves, wolverine, moose, sea lions, and other marine mammals...”, but also states that operators should “maximize” the distance where possible (pg. 15). We agree with this recommendation. The plan requires pilots to maintain “a minimum separation of 500 m AGL and 500 m horizontal distance from wildlife over “near level terrain”. In rolling terrain with less cliff cover, or narrow canyons, the NWSGC suggests a buffer larger than 1,500 m may be appropriate.

The plan includes stipulations specifically for the Nourse region to help mitigate effects on mountain goat kidding areas (item number 4). It recommends that access to the Chilkat Ice Fields be through the West Creek area. It may be useful to review this recommendation as the number of mountain goats observed in the West Creek drainage has been low for several years. We note that mountain goat winter habitat occurs in proximity to Nourse Glacier. Yet, the plan does not include any stipulations specific to the Nourse region during the mountain goat overwintering period. We are pleased to note that BLM states a willingness to incorporate further stipulations as new data from mountain goat radio-collaring studies becomes available. We recommend that BLM follow the NWSGC guidelines for the Nourse region and establish a 1,500 m buffer around winter habitat between November 15 and April 30 (Hurley 2004).

Chapter 4.3 Wildlife:

BLM applied a 1,500 m horizontal buffer around known or projected drop-off and pick-up locations to analyze potential impacts on mountain goats. The plan notes that not all high-use winter mountain goat habitat would experience the same levels of intensity and that “nearly ¼” of recent landings in the South Block occurred in “one geographic location”. If this pattern remains consistent, ultimately that “one geographic location” may receive up to 400 additional

landings in year 1 (under alternative G). More intense use of specific areas may disproportionately disturb mountain goats within 1,500 m. We recommend the BLM consider a more gradual increase in the number of authorized landings than those described in alternative F and G of the plan (e.g. Table 4.3).

The plan states that a 3-year period between incremental increases in activity was incorporated based on mountain goat biology after consultation with ADF&G. We agree that a lag period may help determine if a specific level of activity is influencing mountain goat populations. Based on our knowledge of mountain goat reproductive life history, a 4 or 5-year lag would be more appropriate. A longer evaluation period is necessary because mountain goats do not first reproduce in coastal Alaska until 4 or 5 years of age (White et al. 2012, 2018), and thus the effects of a given helicopter management strategy will not be fully evaluated for 4 or 5 years. Thus, if a 3-year evaluation period is used, it will not be possible to clearly determine if subsequent effects are related to a given management strategy.

Alternative E (pg. 56) states “At this current level of use since 2014, population level effects to mountain goats have not been identified.” This statement is incorrect because our studies have focused on identifying important habitat and not population impacts of helicopter use on mountain goats. Also, we have not been provided the data necessary for an impact study that identifies flight patterns, frequency, timing, and locations of landings. Thus, without such data it is not possible to clearly determine whether population level effects have occurred. The plan will allow incremental increases up to 5,500 landings in summer (alternative G) if they occur at least 1,500 m away from known kidding areas. This would be a 113% increase in landings than currently authorized. BLM assumes most landings in summer will occur in the North Block and be focused on Glacial Landing Tours and be “point-to-point in nature.” Therefore, BLM concludes “much of the impacts can be avoided or minimized by predetermined or predicted flight routes.”

The strategy that BLM suggests for avoiding impacts in summer (i.e. predetermined, predicted flight routes) should also be used in winter. We recommend BLM require operators to provide landing zone/ski run in formation in advance of the heli-skiing season and use that information to design flight routes to minimize helicopter activity within 1,500 m of mountain goat winter habitat (Hurley 2004). The number of winter landings in the plan varies considerably among alternatives. For example, alternative E would continue to authorize up to 300 winter landings in the South Block (the same number that has been authorized since 2014). In contrast, alternative G (BLM’s preferred alternative) would authorize up to 1,600 landings (a 433% increase) in year 1 and up to 5,500 landings (a 1,733% increase) in year 9. The plan states that most of these landings would occur in the South Block and BLM estimates that (under alternative G) a total of 26,174 acres of mountain goat winter habitat (62% of all winter habitat in the Takhinsha region) will be affected. In addition, they predict that in the North Block, if all mountain goat winter habitat in the Chilkoot-Ferebee regions (including Haines Borough approved areas) is impacted, then 11,840 acres or 17% of mountain goat winter habitat will be affected (alternative G). With the percentage and rate of increase in landings of the preferred alternative G, it will be difficult to document mountain goat impacts so that any negative impacts can be assessed, and mitigation implemented in time to preserve a healthy mountain goat population.

Section 4.5 (pg. 62) states that helicopters have “no effect on the landscape, result in no ground disturbing activities...”. Helicopters and skiers can cause avalanches inadvertently and intentionally. Avalanches have the potential to kill or injure wildlife and remove trees changing habitat in the avalanche path. Avalanches are a common cause of mortality among radio collared mountain goats in the Haines area with 45% of all mortalities being caused by avalanches (White, unpublished data). Brown bear mortality due to avalanche has also been documented in Alaska (Hilderbrand et al. 2000).

Wildlife Resources Conclusions and Recommendations:

Increases in helicopter activity within 1,500 m of mountain goats and in proximity to important habitat may have proportional cumulative effects of disturbance. Alternatives A and E do not increase helicopter activity beyond past use, therefore potential impacts to wildlife disturbance would not change. Because establishing an ERMA authorizes the most helicopter activity, those areas have the most potential to negatively affect wildlife. For example, the ERMAs within alternatives F (317,096 acres) and G (251,629 acres) each allow a significant increase in helicopter activity during both summer (Table 4.1) and winter (Table 4.2), potentially having a negative effect on wildlife populations through increases in disturbance. Given that aerial survey data has not been consistently collected on some BLM land and helicopter flight/landing data has not been provided to ADF&G, it may be prudent to consider a more gradual increase in helicopter activity. This would allow more time to assess the effects of increases in activity and the planned mitigation measures.

Helicopter and fixed-wing aircraft are both excluded in the North Block within the MCA (alternatives A and F). Having an exclusion zone is important and will assist in analyzing the effects of helicopter activity on wildlife. Alternative F would retain the MCA for only a 5-year period and would not allow enough time to assess the effects of incremental increases which continue for 9 years with the greatest impacts to goat populations expected to occur near the end of the 9 years when the largest number of landings would occur. Alternative G creates a SRMA (65,467 acres) in the North Block, which would exclude helicopter use but not fixed-wing aircraft, and is smaller in size than the MCA (98,004 acres). The SRMA for Alternative G would provide long-term exclusion of helicopter-assisted recreation. This would eliminate that source of disturbance on mountain goats and other wildlife. However, the stipulations for the SRMA are not identical to the MCA (fixed-wing landings would be allowed). Alternative F would include an MCA for a period of 5 years. Maintaining the existing MCA shown in alternative A with the same stipulations at least through the period necessary to investigate the impacts of increasing helicopter use would provide consistency for use as a control to assess effects of increasing activity on mountain goats and other wildlife. Alternative E includes an ACEC (77,797 acres), which excludes all motorized or mechanized use. The objective of the ACEC would be to serve as a “wildlife refugia” (pages 21, 83, 88), recognizing the unique genetic characteristics of mountain goats in the area (Shafer et al. 2012, Shafer 2013), and could also be used as an MCA. Although smaller than the MCA, it is 12,330 acres larger than the SRMA. Because it eliminates motorized activity, the ACEC has the least potential for disturbing wildlife of all the land management types offered in the Draft RMP A/SDEIS.

Overall, helicopter landings are indiscriminately assigned to large blocks of the landscape and may allow for highly concentrated use of specific areas. A more appropriate strategy would

involve cross-referencing mapped wildlife habitat with helicopter skiing areas at a finer spatial scale in order to ensure that spatial overlap of areas is minimized and that landing intensities are appropriate for given areas. Such an approach would provide a strategy for minimizing conflicts while simultaneously optimizing the multiple use needs of the landscape.

BLM recognizes that ADF&G mountain goat research is ongoing, and the plan states that new information will be considered and applied to permit conditions as needed. We think this flexibility in the plan is important and can help mitigate potential effects on mountain goats as well as benefiting permittees. We add that ADF&G brown bear research is also ongoing and in the future information about other species may become available. We look forward to our continued collaboration with BLM and the Haines Borough. We hope that the BLM will consider and attempt to mitigate potential negative effects on all wildlife when authorizing permits in the future.

The plan states that as new authorizations occur on BLM land, use in some areas may shift away from land managed by the Haines Borough. It's also possible that use will remain the same or even increase on Haines Borough land in the future. Some mountain goat populations in the area utilize land managed by both the Haines Borough and the BLM (e.g. Takshanuk Range) further complicating resource management. If BLM continues to collaborate with the Haines Borough and ADF&G, this may improve efficiency of information sharing and a coordinated management strategy may benefit the operators. We appreciate the effort and outreach that went into developing the Draft RMP A/SDEIS and we thank you for the opportunity to comment.

Recommendations:

1. Create a 1,500 m disturbance buffer (include AGL for flights) around brown bear winter habitat and known bear den sites from November 15–June 1.
2. On page 14, Table 2.2 and Section 2.2.2 item number 1 add the words “or fly” as follows: “...not land [or fly] within 1500 meters of known kidding areas.” Adjust all other mountain goat stipulations to be consistent with the NWSGC recommendations (Hurley 2004). For example, ensure operators use a 1,500 m vertical and horizontal distance from mountain goat winter habitat per the NWSGC. Use models to determine kidding habitat with a high probability of use and apply stipulations to those areas.
3. Adjust the time period between incremental increases in helicopter landings to at least 4 years based on mountain goat reproductive life history (White et al. 2012, 2018). This will facilitate monitoring effects on mountain goat populations. Consider a more gradual level of increase in activity levels until potential effects on wildlife can be better understood.
4. Require operators to provide ski route, landing zone, and flight path GPS data to all interested parties to facilitate understanding of potential effects on wildlife (including triggers) and other potential tradeoffs. In addition, information is needed regarding the number of landings, and intensity of use, of each specific area. Monitor all flights for compliance and work with operators to ensure stipulations are clearly understood.
5. Require operators to provide desired areas of operation prior to the ski or summer tourism seasons. Require operators to follow flight paths which avoid flying within 1,500 m of winter habitat for mountain goats and brown bear denning habitat, as well as kidding areas for mountain goats where feasible.

6. As part of the adaptive management process consult with ADF&G to conduct simulations to determine if triggers are appropriate and add an appropriate minimum population size as an important trigger.
7. Maintain the current MCA and associated stipulations to allow for more consistent monitoring of potential effects. If this is not feasible consider adding the same stipulations to the SRMA (Alternative G).

Fish Resources:

Although fuel storage is not described in the SDEIS, given proper fuel storage and handling procedures are followed, we do not expect any of the alternatives will impact fish resources in the Haines/Skagway Area.

Page Specific Comments:

3.7 Environmental Justice, page 50, 1st paragraph, last sentence. The SDEIS reads “However, community harvest data from the State of Alaska’s Community Subsistence Information System (CSIS) does not include specific information about the harvests of mountain goats by the village of Klukwan (ADFG 2018).” The CSIS does have harvest data for goats for Klukwan in 1996. It looks like the reference is for DWCs goat registration hunt statistics web page and not the CSIS.

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Alaska Department of Natural Resources (DNR)

With a few exceptions noted below DNR is generally supportive of BLM’s efforts via this planning document to regulate helicopter access to the area. As noted in the SEIS in section 1.7 ‘Related Plans’, the State of Alaska adopted the Haines State Forest Management Plan in August 2002 (HSFP). The State Forest was established by the legislature for the purpose of the utilization, perpetuation, conservation, and protection of the land and water, including, but not limited to, the use of the renewable and nonrenewable resources through multiple use management, and the continuation of other beneficial uses, including traditional uses and other recreational activities. Additionally, the HSFP established the Special Use Area (SUA) within the planning area to regulate commercial helicopter flights. This special use designation was proposed to establish specific areas and dates for heli-skiing operations and set standards for these operations, as well as prohibiting helicopter landings on state lands for the purpose of commercial recreational tours (such as glacier landing tours). For various reasons, the regulations pertaining to Heli Skiing operations within the SUA were not adopted and helicopter operations continue to occur under the State’s generally allowed uses regulations.

That said, BLM’s intention to increase helicopter access and use less prescriptive management designations in the planning area is consistent with the State’s management intent for these blocks of land. According to the State’s Northern Southeast Area Plan, these areas should be managed for General Use, and BLM’s land management direction, as indicated in this SEIS is

consistent with the State's General Use designation. Whether increased helicopter traffic would be too detrimental to wildlife and habitat in the planning area, however, is a matter for the Alaska Department of Fish and Game, and we therefore defer to their expertise on these matters.

Consolidated Agency Comments

Areas of Critical Environmental Concern for Cultural Resources:

The BLM proposes designating an ACEC for cultural resources for mountain goats for the purpose of securing mountain goat wool for “Chilkat Blankets” or “Naaxéin,” but BLM has not justified that special management of mountain goat habitat is needed for weavers to obtain mountain goat wool. There appears to be little demand for mountain goat wool since the plan states there are few traditional weavers in Klukwan and it takes three traditional weavers approximately eight years and three mountain goats to make a blanket. We note that Rofkar (2014) reported obtaining portions of wool from seven mountain goats over 17.5 years to gather enough wool to weave one robe. Rofkar also stated that late winter is the best time to harvest wool for weaving. Currently there are no barriers to subsistence harvest of mountain goats within the area proposed for the ACEC (i.e. GMU 1D); in GMU 1D, subsistence harvest of mountain goats is by a registration hunt and not a drawing hunt, which is awarded by lottery and used for high demand hunting permits. Also, there is no local rural preference currently under federal subsistence regulations; if the harvestable surplus of mountain goats needed to be limited in the future, the subsistence hunt in GMU 1D would first be restricted to only local rural residents. This is the current situation in nearby GMUs as mountain goat hunting under federal subsistence regulations is only allowed for local rural residents in GMU 1B and 1C, but in GMU 1D it is open to “all rural residents.” The ADF&G has primary management responsibility for the management of wildlife within the state and mountain goat populations are sustainable. It appears that the limiting factor for “Chilkat Blankets” or “Naaxéin” is not the availability of mountain goats for wool, but the availability of traditional weavers. While blanket weaving has had a recent resurgence, it appears unlikely that mountain goats will become the limiting factor within the lifetime of the RMP amendment. In any event, an ACEC would not address harvest timing or allocation issues related to weavers' ability to obtain wool; the appropriate entities to address any such issues would be the Alaska Board of Game and the Federal Subsistence Board. Also, BLM does not explain why this specific place is important for taking goats for wool, as opposed to other areas of goat habitat.

We are also concerned that a fish or wildlife species is being used as a cultural ACEC. After reviewing the BLM Manual 8100 – The Foundations for Managing Cultural Resources we did not find fish and wildlife species in the definition of cultural resource. As described in the handbook, cultural resources are concrete, “material places and things,” not fish or wildlife species:

Cultural resource or cultural property: a definite location of human activity, occupation, or use, normally greater than 50 years of age, identifiable through field inventory, historical documentation, or oral evidence. The term includes archaeological, historical, or architectural sites, structures, places, or sites or places with important public and scientific uses, and may include definite locations (sites or places) of traditional cultural or religious importance to specified social and/or cultural groups (cf. “traditional

cultural property”). Cultural resources are concrete, material places and things that are located, classified, ranked, and managed through the system of identifying, protecting, and utilizing for public benefit described in laws, regulations, and the BLM Manuals.

While we do not think it is appropriate to designate this area as a cultural ACEC, as noted in the above comments, we support management actions that conserve wildlife habitat.

Thank you for this opportunity to comment. Please contact me at 907-269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with a large initial "S" and a long, sweeping tail.

Susan Magee
ANILCA Program Coordinator