



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Natural Resources
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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September 25, 2025

Bureau of Land Management
Attention: Jorjena Barringer
Planning and Environmental Coordinator
Glennallen Field Office
P.O. Box 147
Glennallen, Alaska 99588

Submitted online at <https://eplanning.blm.gov/eplanning-ui/project/2031076/570>

Re: Thompson Pass and Valdez Guided Helicopter Skiing Preliminary Environmental Assessment (DOI-BLM-AK-A020-2024-0007-EA)

Dear Ms. Barringer,

The State of Alaska (State) reviewed the Thompson Pass and Valdez Guided Helicopter Skiing Preliminary Environmental Assessment (EA). The preliminary EA considers the issuance of up to eight special recreation permits (SRPs). The comments below incorporate input from the Departments of Natural Resources (DNR) and Fish and Game (ADF&G).

Incorporated by reference are the ADF&G scoping comments (letter of April 12, 2024) which stated concerns regarding the goat population in the area. The primary scoping comment asked BLM to work with ADF&G to develop valid baseline data on goats in the area and a monitoring program for these special recreation permits (SRP). Responses to the scoping comments were not included in the preliminary EA.

The State also offers the following comments to be considered in the EA and decision processes.

State Topfilings and Permit Administration

The preliminary EA correctly states that “many of the lands under BLM administration are encumbered by pending selections by the State of Alaska ... and may in the future be transferred to those entities.” Additional information should be added to the preliminary EA that will detail 1) the conditions and processes under which conveyance of selected or topfiled lands to the State of Alaska is most likely to occur, 2) permitting requirements on lands that have been selected or topfiled but not yet conveyed, and 3) the impacts of conveyance on the administration of BLM Special Recreation Permits (SRPs).

Conveyance of State Selections and Topfilings

The lands within the BLM permitting area include those withdrawn by Public Land Order (PLO) 5150. The BLM and the State of Alaska are currently coordinating the revocation of PLO 5150. If the portion of PLO 5150 from the south bank of the Yukon River to Prince William Sound is

lifted, topfiled lands within the PLO 5150 corridor State shall become effective selections without further action by the State upon the date that the lands included in such application become available¹. The State intends to acquire selections adjacent to the Richardson Highway immediately upon revocation of PLO 5150, but selected lands further from the Richardson Highway are lower priority and are not likely to be pursued for acquisition in the foreseeable future. The EA and future planning documents should provide this context and describe the conditions and processes by which BLM permitted areas would be conveyed to the State.

Permitting Requirements on State Selected or Topfiled Lands

On BLM lands that have been selected by the State, a letter of concurrence is required pursuant to Section 906(k) of the Alaska National Interest Lands Conservation Act (ANILCA). DNR already has received requests for concurrence from operators, and these permitting requests are currently being adjudicated. Questions regarding 906(k) concurrence letters or general permitting requirements should be directed to the Department of Natural Resources, Division of Mining, Land & Water, South-Central Regional office: dnr.scro@alaska.gov.

Impacts of Conveyance on BLM Permits

Permits issued for activities on lands that are anticipated for conveyance to the State of Alaska may contain a termination clause that would take effect upon conveyance. If the SRPs being considered under this EA do not contain termination clauses, either a waiver of administration or a succession of interest would be required for the State to assume administration of these permits, depending on the specifics of the authorizations and whether the permitted area extends beyond the conveyance area. The EA must include specific information detailing whether the BLM intends to include a termination clause in the SRPs issued for guided helicopter skiing, and if not, how administration of permits would be transferred to the State in the event that permitted areas are conveyed to the State.

Wildlife Impacts

ADF&G is the primary authority responsible for managing fish and wildlife populations across the state, regardless of land ownership or designation. This includes jurisdiction over sustainability, regulation, and subsistence use—unless expressly preempted by federal law. The final EA must acknowledge the distinct legal authorities that State fish and wildlife agencies hold on federal lands.

The 2007 East Alaska approved Resource Management Plan (RMP) identifies the protection of wildlife, including game species like mountain goats and their important habitat as one of its goals², yet this EA fails to demonstrate how the proposed action alternatives align with that goal. The EA does not identify trends in mountain goat populations and fails to analyze whether the four existing permitted operations are a contributing factor to this decline. Given the observed population decrease and the lack of data on cumulative impacts, ADF&G finds no wildlife data to support the proposed increased number of operators.

¹ ANILCA, Section 906(e)

² East Alaska Record of Decision and Approved Plan, Section Y. Wildlife including Special Status Birds and Mammals, Y-1 Goal 1: In cooperation with ADF&G, ensure optimum populations and a natural abundance and diversity of wildlife resources, including those species that are considered BLM sensitive status species.

ADF&G has concerns about the proposals in Alternatives B and C to add additional permitted operators to the area, as the preliminary EA did not address whether existing operations may be impacting the local goat population. Recent ADF&G surveys show the goat population in the Tiekel-Tasnuna area has declined. The ADF&G's 2023 data indicate the population is lower than in previous surveys from 2012 and 2016.

ADF&G disagrees with the decision to dismiss Wildlife – Mountain Goat and Dall sheep populations and Wildlife – Mountain Goat Reproduction as issues analyzed in detail for the following reasons.

- The EA's assumption that simply maintaining a visual distance from wildlife is enough to prevent negative impacts is flawed. Helicopter pilots can often find themselves within closer proximity to goats and sheep than allowed³ before an animal is even seen.
- The final EA fails to address the energetic costs to animals that may be inadvertently impacted over the winter, a crucial time for conserving energy.
- BLM has not identified any efforts made, in accordance with the East Alaska RMP, to identify important wintering areas for goats in the larger permitted area, nor shown whether the previously permitted activities have displaced goats within the permitted area.
- Isolating operations to times outside of kidding and mating periods does not ensure that reproduction is not impacted. The proposed mitigation measures, though good in theory, are not proven to work effectively at all levels of activity. The EA fails to address a critical question: Is there a certain amount of activity beyond which elevation minimums and other mitigation measures are no longer adequate to protect the goat population? This question should be addressed in the final EA and decision.

The State does not oppose the continuation of current activities with four operators while additional information is gathered. However, ADF&G cannot support any action that would double the level of activity, given that the EA did not address whether the level of current operations may be contributing to the decline of the goat population. The East Alaska Record of Decision in Object Y-3, #10, indicates that Heli-ski landings or skiing is “not permitted in mountain goat or Dall sheep critical ranges, as identified based on ADF&G maps **and refined by monitoring.**”⁴ [emphasis added] The ADF&G 2024 Scoping Comments requested, in accordance with the RMP: “A proposed monitoring plan as well as an adaptive management proposal that clearly identifies the adjustments that will be made when monitoring during project implementation indicates the action is causing unintended and undesirable impacts to mountain goats.” Please see the ADF&G scoping letter (attached) for further information. The final EA should include a discussion of any monitoring that has been conducted to date, as well as a monitoring plan and adaptive management proposal. These proposals should be discussed with ADF&G local area staff prior to inclusion in the final EA.

³ EA Section 2.2.5, Feature 2, outlining a horizontal distance of ½ mile and vertical distance of 1,500 feet.

⁴ East Alaska Record of Decision and Approved Plan, item Y-3.

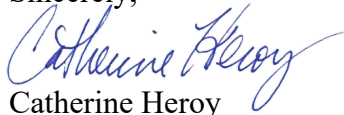
In summary, BLM fails to justify the proposal to double the number of permitted operators in the area, especially given the decline in goat numbers and the current lack of additional data. The State concurs with BLM's decision to maintain existing wildlife closure areas.

These comments are focused on wildlife, however, ADF&G appreciates that BLM included an alternative that tries to mitigate the user conflicts they identify in the EA (which could increase with twice as many permitted operators). At this time, ADF&G can only support Alternative A as the preliminary EA does not address whether the observed decreases in the mountain goat population in the area are related to heliski activities nor does the EA include a monitoring and adaptive management proposal. Without some sort of a monitoring program in place, BLM has not demonstrated, in accordance with the RMP, that the mountain goat critical habitat areas have not changed.

Closing

Thank you for the opportunity to review and comment on this proposed project. Please contact me at (907)269-0880 or by email at catherine.heroy@alaska.gov to coordinate any follow up discussions.

Sincerely,



Catherine Heroy
Federal Program Manager

Attachment: April 12, 2024, ADF&G Scoping Comments Regarding Valdez and Thompson Pass
Guided Helicopter Skiing EA



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Fish and Game

Division of Wildlife Conservation
1255 West 8th St.
PO Box 115526
Juneau, Alaska 99811-5526
Main: 907.465.4190
Fax: 907.465.6142

April 12, 2024

Glennallen Field Office
P.O. Box 147
Glennallen, AK 99588

Sent via email: cnfheli@usda.gov

Attn.: Scoping Comments Regarding Valdez and Thompson Pass Guided Helicopter Skiing EA

To whom it may concern,

The Alaska Department of Fish and Game (ADF&G) reviewed the scoping information for the Bureau of Land Management (BLM) Valdez and Thompson Pass Guided Helicopter Skiing Environmental Assessment (EA). ADF&G staff appreciated being able to attend the Valdez public presentation by phone. ADF&G provides the following comments on the BLM's plan to issue Special Recreation Permits (SRPs) for guided helicopter skiing (heli-skiing). These SRPs will be valid for up to a ten-year period, from 2026 through 2035 (some permits may be a renewal and some permits may be awarded to new operators in the area). The areas proposed for authorization include BLM managed lands in the Chugach Mountain range in the Valdez, Thompson Pass, and Tikel Block areas. The intent is to make approximately 150,000 acres of BLM land available for heli-ski operations.

We request additional interagency discussions on this project prior to the EA's public release as the project has the potential to negatively impact mountain goat population. Specifically, we would like to discuss a valid baseline and monitoring program associated with the SRPs. This will ensure any mountain goat population impacts that develop over time are caught early and mitigated.

ADF&G is about to launch a study in collaboration with the U.S. Forest Service Cordova Ranger District on the effects of heli-skiing on their lands in the Cordova area. Location data for flight paths and touchdowns on BLM lands would be a huge benefit to the study. Pooling our resources for survey and collaring activities and working together on these studies will result in the best outcomes for goats and heli-skiers. At a minimum, we should ensure our survey areas are standardized and our collaring activities are coordinated so that we are all talking about the same things when looking at results.

ADF&G is the agency responsible for the management of all wildlife populations in Alaska and the Master Memorandum of Understanding (MMOU) that exists between our two agencies recognizes the ADF&G as the primary agency responsible for policy development and management direction relating to the uses of wildlife resources on BLM lands.

We request the draft EA include the following information:

- Please include reference to ADF&G authority to manage fish and wildlife on all lands in Alaska regardless of ownership, unless specifically superseded by federal law and how that management overlays with the BLM's land management responsibilities. We are happy to assist you with crafting this language.
- Please include a commitment to cooperate as outlined in the Master Memorandum of Understanding between our agencies. A copy of the MMOU is attached for your reference.
- Is the proposed land area planned for opening (150,000 acres) the same area currently permitted? If not, please describe the existing conditions that need to change, if any, and the reasons why the change(s) are needed.
- Any changes to the number of operators allowed to hold heli-skiing SRPs in this area.
- The number of client days current operators are using on average and any changes proposed in the number of client days that will be allowed.
- Information on what dates the season will be open. Seasons in the Lower 48 often run from December 1 until April 30, In Alaska, heli-ski season generally run from February to the end of April due to the lack of daylight hours¹.
- A no action alternative. Our primary concern is the potential for negative impacts from any increased flight activity on existing mountain goat populations. Negative impacts, as outlined by the Northwest Sheep and Goat Council can include: reduction of foraging, increase in movement rates and energetic expenditure, and spatial displacement from important habitats during critical period.²
- A proposed monitoring plan as well as an adaptive management proposal that clearly identifies the adjustments that will be made when monitoring during project implementation indicates the action is causing unintended and undesirable impacts to mountain goats.
- The effects of the proposed action and the effects of the adjustment must also be described.
- Information on baseline winter habitat and mountain goat population numbers in the proposed project area.
- Information on who will collect data on winter habitat and numbers of goats encountered/observed during heli-ski operations. Will BLM and/or individual permit holders collect data?
- If the permit holders are collecting data, how will BLM ensure accurate data is being collected? What will trigger permit adjustments? What will the timeline on adjustments be?
- Please explain if there will be any "zoning" done in association with the proposed permits (e.g., areas where no heli-skiing is allowed, areas where no heli-skiing is allowed during certain time periods, etc.).
- Does BLM have sufficient baseline data to be able to determine if the goat population is declining as a result of the permitted activities? Baseline information for surveys is critical to ensure surveys are carried out in a scientifically valid and standardized manner.
- What will trigger a permittee needing to change locations (i.e., distance from observed mountain goat)? Will a buffer distance from observed mountain goats be included in the permits? The size of the buffer distance and how it was determined should be included in the EA.
- How will BLM determine goat movements? Will individuals and/or groups be followed?
- How will you quantify areas of habitat that support mountain goats? Will you look at polygon change? If so, what will you do if the size of the polygon just changes?

¹ <https://blog.heli.life/ski-ride/the-best-time-to-go-heli-skiing-in-alaska>
<https://majesticheliski.com/weather/>
<https://www.alaskaheliskiing.com/>

² Northern Wild Sheep and Goat Council. 2020. Northern Wild Sheep and Goat Council position statement on commercial and recreational disturbance of mountain goats: recommendations for management. Proceedings of the Biennial Symposium of the Northern Wild Sheep and Goat Council, 22:2.

- How often will BLM fly mountain goat surveys? What will you do if weather grounds flights, how will these surveys be made up?
- How will search intensity be standardized?
- Does BLM believe the snowpack will impact goat movement? If so, how will that be measured?
- Will BLM use collared goat data and aerial survey data? How will that data be acquired and analyzed?
- How will BLM monitor operator compliance to ensure the information obtained is valid.
- Please consider and include an analysis of potential impacts to goat hunters (both those hunting under federal subsistence regulations as well as those hunting under State regulations).
- An 810 Analysis will be required in the EA, evaluating whether the proposed heliskiing will have a significant effect on subsistence resources or uses. This analysis is required by the Alaska National Interest Lands Conservation Act (ANILCA), Section 810.
- We recommend prioritizing research on those areas with the highest anticipated use. If BLM is proposing to use an adaptive management strategy, the areas to be surveyed can increase if determined necessary as time goes on.

ADFG is a natural partner for the collection of these data. We are cognizant of the scope of the possible research and the cost involved in conducting surveys or collaring studies. We are happy to discuss opportunities to collaborate and pool resources.

ADF&G appreciates the opportunity to offer scoping comments for this EA. We look forward to working with BLM staff to develop a baseline study and monitoring program that provides opportunities for operators while protecting the mountain goat population. Should you have any questions or concerns, please feel free to contact me, Charlotte Westing, ADF&G Prince William Sound Area Wildlife Biologist (907-424-3215, charlotte.westing@alaska.gov) or Heidi Hatcher (907-822-3461, Heidi.Hatcher@alaska.gov) at your earliest convenience.

Sincerely,

Ryan Scott

Ryan Scott
Director, Division of Wildlife Conservation

MASTER MEMORANDUM OF UNDERSTANDING
BETWEEN
THE ALASKA DEPARTMENT OF FISH AND GAME
Juneau, Alaska
AND
THE U.S. BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR
Anchorage, Alaska

This Master Memorandum of Understanding between the State of Alaska, Department of Fish and Game, hereinafter referred to as the Department, and the U.S. Department of the Interior, Bureau of Land Management, hereinafter referred to as the Bureau, reflects the general policy guidelines within which the two agencies agree to operate.

WHEREAS, the Department, under the Constitution, laws, and regulations of the State of Alaska, is responsible for the management, protection, maintenance, enhancement, rehabilitation, and extension of the fish and wildlife resources of the State on the sustained yield principle, subject to preferences among beneficial uses; and

WHEREAS, the Bureau, by authority of the Constitution, Laws of Congress, executive orders, and regulations of the U.S. Department of Interior has a mandated responsibility for the management of Bureau lands, and the conservation of fish and wildlife resources on these lands; and

WHEREAS, the Department and the Bureau share a mutual concern for fish and wildlife conservation, management, and protection programs and desire to develop and maintain a cooperative relationship which will be in the best interests of both parties, the concerned fish and wildlife resources and their habitats, and produce the greatest public benefit; and

WHEREAS, it has been recognized in the Alaska National Interest Lands Conservation Act (ANILCA) and subsequent implementing Federal regulations that the resources and uses of Bureau lands in Alaska are substantially different than those of similar lands in other states; and

WHEREAS, the U.S. Congress and the Alaska Legislature have enacted laws to protect and provide the opportunity for continued subsistence use of Alaska's fish and wildlife resources by rural residents; and

WHEREAS, the Department and the Bureau recognize the increasing need to coordinate resource planning, policy development, and program implementation;

NOW, THEREFORE, the parties hereto do hereby agree as follows:

THE DEPARTMENT OF FISH AND GAME AGREES:

1. To recognize the Bureau as the Federal agency responsible for multiple-use management of Bureau lands including wildlife habitat in accordance with the Federal Land Policy and Management Act, ANILCA, and other applicable law.
2. To regulate and manage use of fish and wildlife populations on Bureau lands in such a way as to maintain or improve the quality of fish and wildlife habitat and its productivity.
3. To consult with the Bureau in a timely manner and comply with applicable Federal laws and regulations before embarking on enhancement or construction activities on or which would affect Bureau lands.
4. To act as the primary agency responsible for management of all uses of fish and wildlife on State and Bureau lands, pursuant to applicable State and Federal laws.
5. To notify the Bureau of any animal damage control activities on Bureau lands; and to obtain Bureau approval for the use of pesticides, herbicides, or other toxic chemical agents in the course of animal damage control.
6. To provide all maintenance on facilities, structures, or other construction owned by the Department on Bureau lands; and to hold the Bureau harmless for liability claims resulting from these constructions, facilities, and/or structures.

THE BUREAU OF LAND MANAGEMENT AGREES:

1. To recognize the Department as the primary agency responsible for management of use and conservation of fish and wildlife resources on Bureau lands.
2. To recognize the right of the Department to enter onto Bureau lands at any time to conduct routine management activities which do not involve construction, disturbance to the land, or alterations of ecosystems.
3. To recognize the Department as the primary agency responsible for policy development and management direction relating to uses of fish and wildlife resources on State and Bureau lands, pursuant to applicable State and Federal laws.
4. To incorporate the Department's fish and wildlife management objectives and guidelines in Bureau land use plans unless such

provisions are not consistent with multiple use management principles established by FLPMA, ANILCA, and applicable Federal law.

5. To adopt the State's regulations to the maximum extent allowed by Federal law when developing new or modifying existing Federal regulations governing or affecting the taking of fish and wildlife on Bureau lands in Alaska.
6. To notify the Department of any portion of the Department's fish and wildlife management objectives, guidelines, or State regulations that the Bureau determines to be incompatible with the purposes for which Bureau lands are managed.
7. To manage Bureau lands so as to conserve and enhance fish and wildlife populations.
8. To inform the Department of proposed development activities on Bureau lands which may affect fish and wildlife resources, subsistence and other uses, and to provide or require appropriate mitigation where feasible.
9. To permit, under appropriate agreement or authorization, the erection and maintenance of facilities or structures needed to further fish and wildlife management activities of the Department on Bureau lands, provided their intended use is not in conflict with Bureau policy and land-use plans.
10. To recognize that the taking of fish and wildlife by hunting, trapping, or fishing on Bureau lands in Alaska is authorized in accordance with applicable State and Federal law unless State regulations are found to be incompatible with Bureau regulations.

THE DEPARTMENT OF FISH AND GAME AND BUREAU OF LAND MANAGEMENT MUTUALLY AGREE:

1. To coordinate planning for management of fish and wildlife resources on Bureau lands and adjacent lands having common fish and wildlife resources so that conflicts arising from differing legal mandates, objectives, and policies either do not arise or are minimized.
2. To cooperate in planning, enhancement, or development activities on Bureau lands which require permits, environmental assessments, compatibility assessments, or similar regulatory documents by responding in a timely manner with requirements, time tables, and any other necessary input.
3. To consult with each other when developing or implementing policy, legislation, and regulations which affect the attainment of wildlife resource management goals and objectives of the other agency.

4. To cooperate in the management of fish and wildlife resources and habitat (including planning, regulation, enforcement, protection, restoration, research, inventories, and habitat enhancement) on Bureau lands and adjacent lands having common fish and wildlife resources consistent with the species and habitat management plans and objectives of both agencies.
5. To develop specific plans for cooperative development and joint management of habitat areas determined to be essential to the continued productivity or existence of fish and wildlife populations.
6. To consult with the Department prior to entering into any cooperative land management agreements which could affect fish and wildlife resources.
7. To cooperate in the development of fire management plans which may include establishment of priorities for the control of wild-fires, or use of prescribed fires.
8. To make facilities, equipment and assistance mutually available on request for use in fish and wildlife work and habitat improvement consistent with Bureau and Department requirements.
9. Neither to make nor sanction any introduction or transplant of any fish or wildlife species on or affecting Bureau lands without first consulting with the other party and complying with applicable Federal and State laws and regulations.
10. To provide to each other upon request fish and wildlife data including subsistence and other uses, information, and recommendations for consideration in the formulation of policies, plans and management programs regarding fish and wildlife resources.
11. To cooperate in the preparation of announcements and publications and the dissemination of fish and wildlife information; any material obtained from cooperative studies may be published or reproduced with credit given to the agencies or organizations responsible for its acquisition or development. Any news release relating specifically to cooperative programs will be made only by mutual consent of the agencies.
12. To cooperate and coordinate in the issuance of permits to persons, industry, or government agencies for activities affecting designated anadromous fish streams on Bureau lands, in accordance with Alaska Statute 16.05.870 and to cooperate in the formulation of comments and recommendations on permits issued by other governmental agencies in accordance with the Fish and Wildlife Coordination Act, Clean Water Act and other applicable laws.

13. To resolve, at field office levels, all disagreements pertaining to the cooperative work of the two agencies which arise in the field and to refer all matters of disagreement that cannot be resolved at equivalent field levels to the State Director and to the Commissioner for resolution before either agency expresses its position in public.
14. To meet annually at the Director/Commissioner level and discuss matters relating to the management of fish and wildlife resources and their habitats on, or affected by, respective programs; to provide for other meetings at various administrative levels for discussion of law enforcement, educational programs, cooperative studies, research, fish and wildlife surveys, habitat development, hunting, fishing, trapping seasons, and such other matters as may be relevant to fish and wildlife populations and their habitats.
15. To develop such supplemental memoranda of understanding and cooperative agreements between the Bureau and the Department as may be required to implement the policies contained herein.
16. That this Master Memorandum is subject to the laws of the State of Alaska and the United States. Nothing herein is intended to conflict with current directives, laws or regulations of the signatory agencies. If conflicts arise or can be foreseen, this Memorandum will be amended or a new Memorandum of Understanding will be developed.
17. That this Master Memorandum of Understanding is subject to the availability of appropriated State and Federal funds.
18. That this Master Memorandum of Understanding establishes procedural guidelines by which the parties shall cooperate, but does not create legally enforceable obligations or rights.
19. That this Master Memorandum of Understanding supersedes all previous Master Memoranda of Understanding between the Bureau and Department and all supplements and amendments thereto.
20. That this Master Memorandum of Understanding shall become effective when signed by the Commissioner of the Alaska Department of Fish and Game and the State Director of the Bureau of Land Management and shall continue in force until terminated by either party by providing notice in writing 120 days in advance of the intended date of termination.
21. That amendments to this Master Memorandum of Understanding may be proposed by either party and shall become effective upon approval by both parties.

STATE OF ALASKA

Department of Fish and Game

By Don W. Collinsworth

Don W. Collinsworth

Commissioner

Date 6-28-83

U.S. DEPARTMENT OF THE INTERIOR

Bureau of Land Management

By Curtis V. McVee

Curtis V. McVee

Director

Date 8/3/83

Supplement to the
MASTER MEMORANDUM OF UNDERSTANDING
between
THE ALASKA DEPARTMENT OF FISH AND GAME
AND
THE BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR, ALASKA

SIKES ACT IMPLEMENTATION

This supplemental memorandum of understanding is pursuant to the Master Memorandum of Understanding between the Alaska Department of Fish and Game (ADF&G) and the Bureau of Land Management (BLM), Alaska, dated AUG 3 1983, Public Law 93-452, of October 18, 1974, 16 U.S.C. 670a et seq., commonly referred to as the Sikes Act, provides the broad authority to: 1) Plan and carry out fish and wildlife conservation and habitat rehabilitation programs on Bureau lands consistent with overall land use plans; 2) Protect significant habitat for threatened and endangered species; and 3) Enforce regulations to control off road vehicle (ORV) traffic or other public use of lands subject to conservation and rehabilitation programs conducted under the Act.

The Act in no way diminishes the authority of the State of Alaska to manage resident fish and wildlife populations.

It is the purpose and intent of this supplement to provide a working relationship and procedure for implementation of the Sikes Act on Bureau lands in Alaska between ADF&G and BLM.

Terms used in this supplement are defined as follows:

- 1) Conservation and rehabilitation program - Includes programs necessary to protect, conserve, and enhance wildlife resources to the maximum extent practicable on Bureau lands consistent with any overall land-use and management plans for the lands involved.
- 2) Habitat Management Plan (HMP) - BLM's intensive, detailed action plan for wildlife management on a specific geographic area of biological interest on Bureau lands. The HMP is a cooperative plan with the State Wildlife agency and is based on current public input. The HMP shall be the implementing document for the Sikes Act.
- 3) Bureau Lands - These are public lands under the jurisdiction of the Bureau of Land Management.

THEREFORE, BE IT RESOLVED THAT FOR THE PURPOSE OF IMPLEMENTING P.L. 93-452, ADF&G and BLM mutually agree to the following:

- 1) HMPs will be implemented for areas where land-use plans have been prepared, unless otherwise authorized by the State Director, BLM.
- 2) HMPs will be based on priorities within Alaska, as mutually selected by the Commissioner, ADF&G, and the State Director, BLM. Guidelines for establishing HMP priorities shall be based on the following:
 - a) The basic resource values which may be enhanced and benefits produced by implementation of active management programs and/or regulations.
 - b) The identification, through the BLM or ADF&G planning systems, of areas having a need for intensive wildlife management.
 - c) The potential for wildlife habitat to be altered by land use activities such as energy and industrial development, urban expansion, road construction, and ORV traffic.
 - d) The need to protect important and/or critical fish and wildlife habitat such as salmon spawning areas, moose winter range, or the habitats of endangered or threatened species.
- 3) Protection will be afforded to those fish and wildlife species designated as threatened or endangered by the Alaska Department of Fish and Game or by the Secretary of the Interior pursuant to Section 4 of the Endangered Species Act of 1973.
- 4) HMPs will specify fish and wildlife habitat improvements or modifications needed.
- 5) Rehabilitation of Bureau lands will be undertaken where necessary to support HMP recommendations and consistent with the availability of funds for that purpose.

- 6) Hunting, fishing, and trapping of resident fish and wildlife on HMP areas will be in accordance with applicable laws and regulations of the State of Alaska.
- 7) It is herein recognized that the Secretary of the Interior has the authority to promulgate regulations to control the public use of Bureau lands consistent with the HMP, including, but not limited to ORV use. BLM and ADF&G will coordinate federal land use and state hunting, fishing and trapping regulations during Sikes HMP development.
- 8) Funds authorized and appropriated for HMP implementation on Bureau lands in Alaska shall include, but not be limited to all activities associated with scientific resource management, such as the following: protection, research, census, law enforcement, habitat management, propagation, live trapping, transplantation, and regulated taking. Funds may be allocated for hiring of personnel, contractual services, physical habitat improvement projects, and grants to colleges. It shall be the joint responsibility of the Commissioner, ADF&G, and the State Director, BLM, to define areas and projects for priority funding under the Sikes Act. It shall be the responsibility of the State Director, BLM to secure funding through BLM's program funding procedures. Final disbursement of Sikes Act Funds shall be made through the State Director, BLM, after consultation with the Commissioner, ADF&G.
- 9) Plans and programs initiated on Bureau lands under the Sikes Act in Alaska shall not conflict with comprehensive plans required of the State under any Federal or State Acts.
- 10) BLM and ADF&G will discuss the following Sikes Act items during the course of their annual coordination meeting:
 - a) A progress report on the current status of HMP implementation.
 - b) The review of wildlife values produced under the existing conservation and rehabilitation programs.

- c) The priorities for HMP implementation.
- d) The program and budget recommendations for the upcoming and succeeding fiscal years.

This supplement shall become effective on the date when last signed and shall remain in force until terminated by mutual agreement, by amendment or abolishment of the Act by Congress, or by either party upon thirty days notice in writing to the other party of its intention to terminate upon a date indicated.

STATE OF ALASKA
Department of Fish and Game

By Don W. Collinsworth
Don W. Collinsworth
Commissioner

Date 6-28-83

U.S. DEPARTMENT OF THE INTERIOR
Bureau of Land Management

By Curtis V. McVee
Curtis V. McVee
State Director

Date 8/3/83