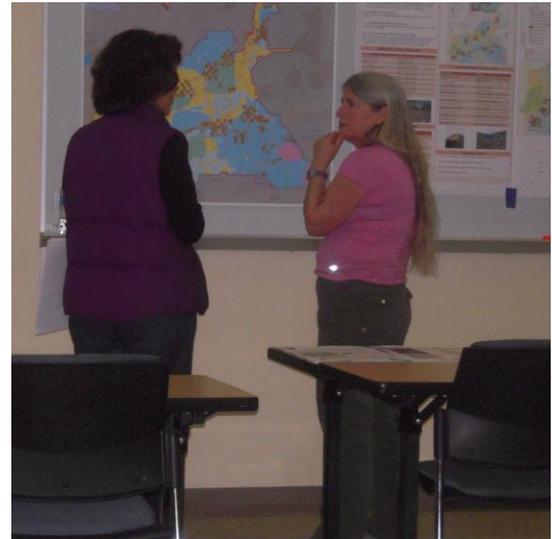


Central Yukon Resource Management Plan Public Scoping Summary Meeting Notes Fairbanks * October 28, 2013



Planning Team

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Questions and Comments during the Presentation:

NEPA/EIS Process

After the Record of Decision is published [for the Central Yukon Resource Management Plan Environmental Impact Statement (EIS)], what authority does the plan have? *BLM explained that future BLM decisions to issue permits and projects must be in compliance with the plan. It acts like a pact with the public about the way that the lands will be managed for the next 20 years.*

Allakaket wants to be a cooperating agency for the CY RMP EIS, and they are going to request Government-to-Government consultation. The Tanana Chiefs Council represents 7 or 8 federally recognized Tribes within the study area.

BLM must have a list of ideas about their future plans that are being floated around internally that the public cannot comment on because we do not know what you guys are planning. [After this scoping process] BLM will come back to the public with a big stack of books and we are expected to wade through those books [the Draft EIS] to make comments on everything in the books. We need you to tell us now what BLM is planning and the items that are changes for the area because you have more ideas than what your presentation says here.

The Central Yukon RMP is incredibly massive and should be broken into smaller parts or small books for the public to review.

The Central Yukon RMP should coordinate with Western Arctic Caribou Working Group, Yukon River Intertribal Watershed Council, and Porcupine Caribou Management group.

BLM's lands are one part of a complicated land management regime that contains a large scale of natural intact ecosystems. Natural intact ecosystems are a really important value that should be acknowledged when talking about the setting and scope for the Plan.

Land Ownership and Land Use

Is there a land trade going on right now between Bettles and BLM or BLM and the State? How does that relate to this Resource Management Plan? *BLM explained they were not aware of a land trade between Bettles and BLM, but there could be some conveyances occurring. BLM explained the conveyance process and the State's "top file" request for Dalton Highway area lands. The Central Yukon RMP can set the stage for land exchanges in the future.*

The public is concerned about impacts associated with the road to Ambler and the road to Umiat. There need to be studies on the potential cumulative impacts associated with these roads and the resource development that would occur because of these roads because these projects will go through the Central Yukon planning area. Cumulative impacts also need to consider the huge new issue of climate change.

Is it okay when submitting comments to reference stuff outside of BLM's land and authority? Like for example, when you say 'designated area' that is sensitive because if you don't it's going to allow access to an area that's sensitive culturally or there is subsistence use or in the case of BLM, when I talk to you about a specific part of BLM land. Can I focus questions only on that? *BLM described reasons for partnering with adjacent land managers to be compatible as possible with different land use plans. It is not always possible to be in perfect sync with the land owners but the more we understand the goals and management plans of our neighbors, we try to do things are compatible. It is valid to reflect on other lands as well when submitting comments.*

The more access that is allowed off of the Dalton Highway, the more the rest of the State is affected. The Dalton Highway is a gateway to other state and federal lands that may need protection.

There should be no new development nodes along the Dalton Highway. We are very concerned about roads that might lead off of this corridor. Most of this area is already open to mining. The balance is already tipped toward much more development.

Federally recognized Tribes within the RMP are concerned with the road to Ambler and what it brings: \$540 million in minerals but it will cost \$400+ million to get to the minerals. Economically, it might not be feasible. The caribou, all the whitefish, the sheefish, the 300,000 chum salmon that spawn in the Hinshaw River by Allakaket...all the animals, the moose and the tourism. There is a lot of tourism up there in the Evansville area.

The Arctic is a national gem to everybody in America; 320 million Americans. It should stay undeveloped.

The issue of access is about more than just what happens on BLM lands, but also access to adjacent lands (especially for the Dalton Corridor). Wild land recreation along the Dalton is possible because of the state's non-motorized buffer zone, five miles on each side. This is important for protecting the type of access that we have, for access to hunting and fishing. Wild land recreation is a broad issue that should be addressed in the RMP.

Conflicts with subsistence should be addressed in the RMP. So we clearly understand the uses and concerns many people had long ago about opening the Dalton Highway to the public. Originally it was closed to the public and was only an industrial use road. Now it is open to the public. It is a well touted recreation area as well as a tourism resource. How will those things change with the other activities proposed in the RMP? As well as the increasing pressure of the tourism and wild land recreation impose to other uses. Those are important to the quality of life of Alaskans. As the tribal representative mentioned, to all Americans that own the federal lands.

Subsistence and Traditional Way of Life

The Yukon River watershed is a backbone of subsistence to several Athabaskan Indian communities and a major source of food of these communities. There is much concern about increased development which would increase contamination or the possibility of contamination of those food sources.

There is a little needle-like strip of land that is poking to the east from the Dalton Highway close to the Chandalar Mine. It is currently closed to mining according to the BLM's land status map and it should be kept closed. If the State gets a hold of it, they would change the land status. It is a heavy subsistence-use area; Native hunters from the community of Venetie use it heavily for moose hunting. This area has the nickname "Moose Highway". The Chandalar Mine threatens Venetie. Because of the 1998 Supreme Court decision, it has become a symbolic village for all villages. *BLM refers to this as the Venetie block.*

There was mention of the subsistence standard to mitigate harmful activities on subsistence. Avoidance is one manner of mitigation. Avoidance should be a higher standard for BLM to set in this plan because of how important subsistence uses are throughout most of the plan area, the central Yukon part of it especially.

I want to make one comment on what is work and what is not working. For quite a few years, I have fed my family on moose and caribou that come from either BLM lands or access via the Dalton corridor. So that has been working really well for me. I love our parks and national wildlife refuges, but to be able to behave like an Alaskan, like so many of us like to behave, that involves interacting a little bit more intensively with the

land than many of our parks or refuges allow. Yet, the way I do subsistence is sustainable. My grandchildren or great grandchildren could do much the same things that I do now. We have had an experiment over three centuries over what we can and can't do sustainably. We have 49 other examples of ways not to manage our state. We have something really, really special here. We Alaskans use it and share it with the rest of the world. I would really urge you to focus intensively on the sustainability of the actions you permit and ask yourself if the management is leaving this country in as good a shape as inherited it.

Planning Area and Planning Process

The BIA conducted ancient land use mapping of the area [Venetie block or "Moose Highway"] near Chandalar Mine last winter which included old trapping trails. BLM may be interested in this information; although it is tribal information so not too much should be revealed. *BLM: I will follow up with BIA to see if we can get that information. We will be looking for all kinds of information like that.*

Including the Central Arctic Management Area (CAMA) lands in this plan needlessly adds to the complexity of the plan; CAMA is pending congressional action for a good part of the lands.

Public Safety

My comments are specifically about Dalton Highway Health and Safety. There are people in the area that need services. Whether its law enforcement (who did a great job this year), search and rescue, medical, running out of gas, or the need for vehicle repairs. All of those things should be considered as potential impacts in the area. Those who work at the Toolik Field Station often end up helping these people. People don't have money, what do you do with them? People need gas, or have a flat tire. Just the other day, I was part of a rescue team for a motorcycle that tipped over...he was lying out in the Haul road. What do you do? All those things should be considered in the plan. If there are going to be more roads connected to the Dalton Highway, there will be an impact on the local community.

Special Areas

The Toolik and Galbraith Lake areas are stunningly beautiful as well as their research uses. We very much want to see those continue and not be further degraded.

We need to protect the Central Arctic Management Area (CAMA) wilderness study. BLM has only this one in Alaska and it's important to maintain for future generations. We're going to have a long term understanding of the actual natural cycles in that area and the only way that is going to continue is if we fully protect CAMA wilderness study area.

The Nigu Block (CAMA wilderness study area) is a very small wilderness study area that should be enlarged.

Hinshaw Creek, near Allakaket, has a large numbers of spawning salmon and sheefish spawn on the Allakaket River. Would these rivers be appropriate to nominate as an ACEC or wild and Scenic River? *BLM: Yes*

Can areas of critical environmental concern (ACECs) be planned for protection of critical subsistence areas? Or protected for cultural significance? *BLM: We don't have ACECs for subsistence, but the subsistence resource that could serve that purpose (for example there could be an ACEC for caribou or salmon). There is a type of ACEC for cultural values, so I think that is possible.*

Subsistence is critical to cultural integrity so you can make the argument that subsistence is a cultural resource that qualifies for an ACEC.

The Native Village of Chalkyitsik nominated an ACEC in the Eastern Interior RMP in the Upper Black River Subunit for cultural, subsistence, fish, and wildlife purposes. The Northern Alaska Environmental Center is hoping BLM will grant it. We also hope that area will not be opened to oil and gas leasing, or mining because it is currently withdrawn. The BLM should make it clear to the public that scoping is the time for a citizen or Tribe to propose an ACEC through the RMP planning process. This is also a good time to recommend Wild and Scenic River areas.

The Alatna River goes through mostly state land, but there are a couple small parcels of BLM land. Can it still be nominated as a wild and scenic river or is it a waste of time to nominate an area that mostly falls within state land? It would seem a worthy designation if a river crosses large parcels of BLM land. The Alatna River is worthy of consideration for possible scenic river status. Designation also might prevent the BLM from trading to the State in the future too. *BLM: BLM's land use decisions do not apply to state lands, but state-selected lands may not ultimately go to the state so we appreciate comments about those lands.*

A good number of the ACECs in the Utility Corridor are quite small. The BLM should retain these and consider making them larger.

Fish and Fish Habitat

The BLM needs to provide better and more maps. We need maps to understand exactly where mining claims are, where there is mining activity, where there is abandoned mining activity and be overlain with fisheries resources in particular. It is hard to provide scoping comments without some of those maps. I am concerned in these tight budget times that the level of information that BLM has available to them for doing this Plan will not be sufficient. The public needs an opportunity to comment before the Draft EIS on other information (i.e. mapping overlay type of analysis) that might really be needed.

According to the BLM's Preparation Plan for the Central Yukon and Utility Corridor RMPs, the purpose and need for the plan update includes Governor Parnell's Roads to Resources and the greater interest in minerals. An additional reason for updating the plans should be the fate of Yukon River Chinook Salmon which is facing a crisis. This planning area as well as the adjacent plan (Bering Sea Western Interior) which is being launched simultaneously for the rest of the Yukon River to the coast, is a massive, many million acre area where there could be actions taken that would be positive for salmon habitat and stronger than the existing plans. The Central Yukon RMP contains a good part of the spawning areas, headwater, streams, as well as portion of the Yukon River area. Actions taken on BLM lands could be positive for salmon habitat.

Water Resources

For minerals, in the purpose and need planning document [BLM's Preparation Plan] it listed meeting state and federal water quality standards in areas open to as an issue. How should these activities be managed to meet these water quality requirements? Is a data set available? The answer in the Preparation Plan was unsure. That's a pretty big issue and if BLM does not know if there is a data set available, it really seems hard to see if impacts to fisheries and other wildlife could be avoided. In areas that are already open to mining let alone opening new areas.

Has the BLM determined the navigability of some of the waterways in the planning area? As you know, under the Statehood Compact and ANILCA and probably the Constitution, navigable waterways in the state of Alaska accrue to the State of Alaska, as does the management of those streams. At the present time, the State is trying to determine the navigability of all these streams. Is the BLM also trying to determine this navigability, and are they working with the State in determining this navigability so that the jurisdictions either don't overlap or result in lawsuits? *BLM discussed the work of the navigability section at the BLM state office when the State asserts that a river or stream is navigable. BLM may disagree with the State's assertion and must go to court to resolve it. There are no waterways in the Central Yukon Field Office, that we are currently being litigated on navigability. BLM will not be doing a comprehensive study on the navigability of all the streams in the planning area as part of the planning process.*