

# Bering Sea–Western Interior Resource Management Plan Preliminary Alternatives Outreach Issue Summaries by Community

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This document summarizes oral comments from community meetings held during the Bering Sea–Western Interior Preliminary Alternatives Outreach Period. The community meeting summaries are listed in chronological sequence by date of meeting.

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## McGrath, February 23, 2015

### Attendance:

4 residents attended the McGrath community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior Resource Management Plan. Bureau of Land Management (BLM) representatives engaged in discussion with community members around maps. The Iron Dog race was active in town at the time of the meeting on a very warm, sunny day. Many community members were out of town or engaged with race activities.

### Issues and concerns raised:

#### BLM Land

- Regarding discussion of restricted uses and exclusive uses, a resident commented that he did not want to see management actions that would prohibit development in the area.

#### Energy Supply and Mineral Potential

- Energy supply and energy costs are of concern to the community. Commercial peat was investigated in the area years ago. Peat resources were identified, but it was not determined economical for development. The Donlin Gold project could develop a pipeline in the area, but fuel would not be available to the community unless an independent party was identified as a utility. Importing power with long distance transmission lines was also identified as a potential means of supplying power to the region.
- A resident asked if there was potential for oil and gas development in the area. BLM answered the potential is very low due to the geologic formations in the area and the economic feasibility of development.

#### Aquatic Resource Values

- Regarding discussion of riparian conservation areas and aquatic resource values, a resident asked if the proposed Donlin Gold pipeline location played a role in the watershed ratings. BLM responded the proposed project did not influence the ratings; the pipeline location was showed for reference.

#### Additional Community Outreach:

Jorjena Daly (BLM Project Manager) provided a brief interview to Mike Lane of KSKO radio.

Information packets were distributed to:

- Natalie Baumgartner, City Administrator
- Dustin Parker, Mayor
- MTNT, Ltd.
- McGrath Native Village Corporation
- Ray Collins
- Dan Esai, Nikolai

## Holy Cross, March 2, 2015

### Attendance:

20 residents attended the Holy Cross community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior (BSWI) Resource Management Plan (RMP). Bureau of Land Management (BLM) representatives provided a presentation, discussion time around maps, and a sharing session.

## Issues and concerns raised:

### BLM Land

- The community is opposed to the proposed development of a road from Paimiut Slough to the Kalskag area, due to potential increases in access to important subsistence use areas. Summary of discussion:
  - Q: Are roads are a right of way?
  - BLM response: Roads crossing BLM lands are authorized under right of way easements.
  - Q: Is BLM is going to allow the Association of Village Council Presidents (AVCP) proposal for a road from Paimiut Slough to the Kalskags (Kalskag and Lower Kalskag)?
  - BLM response: Some of the proposed route would cross BLM lands. The BSWI RMP will guide BLM decisions on questions like this over the next 20 years. BLM would consider potential impacts to resources such as caribou and moose habitat, waterfowl nesting sites, rivers, and berry picking areas. AVCP has not made a defined proposal to BLM, we are aware of the road proposal. BLM would consider areas to avoid or if the proposed use would be excluded.
  - Comment: I would say to avoid it all together. There are some good hunting grounds down there.
  - BLM response: We heard during scoping that you do not want a road in that area which could provide additional access to the area.
  - Comment: We haven't seen them (AVCP) yet here in Holy Cross.
  - BLM response: Other communities are also concerned about the access that road would provide.

### Wildlife

- The Andy Smith Lake area is important for bird nesting. Sport fishing has been introduced to that area where there is prime bird nesting. Now there are no more birds because there are too many sport fishing boats zooming around in that area now. Fish and game used to band birds there. There were hundreds of ducks and geese down there, but because of this boat ramp they have moved out. This area may be on BLM land.
- The Innoko Bottoms area is prime moose habitat.

### Fish

- Residents are concerned about potential impacts to fisheries. Comments included:
  - Canada issued 150 gold mine permits and we are concerned mining activities could affect our fishing. Can BLM work with Canada for managing fisheries?
  - Global warming is affecting the fisheries.
  - Pollock fisheries impact local fisheries. Now there is only about a quarter of what's left. We cannot manage the number of boats in the river corridor.
  - Does BLM or the State own the water? The state owns the water and manages the fisheries.

### Grazing

- Will BLM need to authorize grazing for the bison reintroduction this spring? BLM can authorize grazing for domestic animals, like reindeer. The grazing authorizations are not for wild animals, such as bison.

## Forestry

- Is there a charge for commercial firewood use? Yes, usually \$10. Personal use is free, but BLM still appreciates residents getting permits for those activities so we can understand how the lands are being used.
- If someone owns an allotment, do they have to have a permit if they are going to harvest wood on their own land for their own use? No.
- If you are giving permission to someone to get resources from BLM lands, and the proposed use is adjacent to an allotment, what happens if they go onto the allotment? It's easy for them to be legal with you, but illegal with us. How do you patrol that? We can use law enforcement rangers and resource staff to do inspections. If we were to authorize a timber permit, usually the trees are marked in advance. If we know there is an allotment in the area, we can provide GPS points to establish use areas.

## Travel Management

- Comments on the low level of snow and the winter definition. Conditions are changing and variable.
- Do weight ratings include both rubber tires and track vehicles?
- I don't think steel tracks should be allowed because it tears up the land. Steel tracks are generally on larger vehicles, which would be excluded from use due to the weight rating.
- I know you have certain restrictions with lines going different ways. I don't think we are too familiar with the different ownerships. I think we would need a pamphlet. The Iditarod and proposed Wild and Scenic Rivers are special areas for travel management.
- The GASH villages (Grayling, Anvik, Shageluk, and Holy Cross) use trails that they have followed for years, mostly using snowmachines. We don't want to see use of these trails prohibited. Many of the historic trails are narrow and you can't fit the bigger vehicles there anyway.
- Who is in charge of the airports? State of Alaska.

## Outfitter Guides

- Increases in hunting from sport hunters (guided or independent) are causing impacts to limited subsistence resources. The community would like to see a broad exclusion zone, not around the community, but buffering around the corporation lands surrounding the community. Summary of discussion:
  - Q: Our Native lands are protected. Will BLM work with the corporations to manage guides and outside hunting impacts in this area? It's happening between here and the corporation lands. We don't allow outside hunting.
  - BLM response: BLM does permit outfitter guides for big game hunting. Fishing guides operate more on the river corridors, which are managed by the state. BLM does not permit transporters, which are where pilots transport sport hunters, drop them off, and then come back and pick them up. Across the state there are Guide Use Areas (GUAs) and there are some on BLM land. We don't have a limit of number of guides per area for BLM land. We are looking at establishing limits within GUAs, and also looking at prohibiting guides within 25 miles of a community. One alternative is for a maximum of 33 for the whole planning area which includes 20 GUAs. Another alternative is for a maximum of 40 guides in the whole planning area. Another idea is to limit any single guide to operate in max of 2 or 3 GUAs.
  - Comment: That's a big decision. Everybody in this area has lost king salmon. Now we have outside people coming in to hunt and we are worried about that. Planes from Bethel or Anchorage are coming in to hunt. It should be restricted. It's affecting waterfowl and fishing and everything.

- Comment: The people were asking to have restricted use areas extended to the hills to take care of our birds. We don't want planes to come and land for the weekend and take what they want and go back to town.
- Q: Did I understand you right that you don't allow guides to fly out?
- BLM response: There guides that accompany hunters and there are also transporters. Transporters are not guiding, they are just dropping people off. We don't presently manage transporters; all they provided is a flight. Some transporters also provide equipment (such as a camp). If the pilot is a licensed guide, then they are under a permit.
- BLM question: Are you getting any meat donated in the communities?
- Community response: No. We don't see any.
- BLM question: Are there any local hires for guides?
- Community response: No. We have seen lots of antlers getting shipped out. We have asked about the meat. We don't have recipes for antler soup.
- BLM comment: We have people check where we know guides are supposed to be operating. The state administers the hunting regulations; BLM does not have authority to make hunting regulations. We can regulate outfitter guides operating on BLM land.
- Community comment: There should be a BLM officer with every guiding camp.
- BLM comment: We are considering an exclusion area for guide activities to include a 25-mile radius around the community.
- Community comment: We would prefer a 25-mile radius around corporation lands.
- Community comment: Up the river in the Koyukuk area, all moose antlers must be cut off the head. That stopped the sport hunting in that area.
- BLM response: That's something to share with the state.
- Community response: We tried.

### General

- We get stopped on the river more than anyone else to check for life jackets.
- It's been like that for a long time. There is no patrolling. Anyone can go poaching all they want and there is nothing done.
- There was a study done last year that showed the State of Alaska spends the most money in the union prosecuting Alaska Natives. We are hoping BLM can take over the waterways for fisheries management. The horns go and the meat stays to rot in the woods. We live here and we live off the land. We are subsistence people.

## Kaltag, March 4, 2015

### Attendance:

13 residents attended the Kaltag community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior (BSWI) Resource Management Plan (RMP). Bureau of Land Management (BLM) representatives provided a presentation, discussion time around maps, and a sharing session.

### Issues and concerns raised:

#### BLM Land

- BLM staff noted the recent boundary change for the BSWI planning area. BLM lands near Kaltag were managed out of BLM's Fairbanks Field Office in the past. BLM lands near Kaltag will now be managed by BLM's Anchorage Field Office with the BSWI boundary change.

- Community remarked that BLM owns some land near Bullfrog Island.
- BLM also has an easement to Unalakleet that goes past Tripod Flats and Old Woman cabins.

### Wildlife

- Western Arctic Caribou Herd (WACH) is generally north of Kaltag, but used to be more common in the area. Waterfowl are important to the community. Kaltag know about the upcoming wood bison introduction, and is not opposed to it. Summary of discussion:
  - WACH is north of Kaltag, but used to be more in the area. One meeting attendee noted seeing the WACH two times in his life.
  - Kaltag has heard about plan for wood bison introduction in April. Wood bison will likely end up on BLM land if they are released in Shageluk.
  - Muskoxen have a lot of feeding grounds. Clarified with community member about the difference between muskoxen and wood bison.
  - The community hunts geese, ducks, and other waterfowl.
  - Kaltag residents generally do not hunt in the Innoko National Wildlife Refuge, due to distance. Instead, they use a slough north of Innoko.

### Fish

- Residents wondered why the Nulato River System was not given a higher aquatic resource rating, and noted its importance to the Kaltag. Summary of discussion:
  - Community member noted interest in discussing local watersheds and aquatic resource values.
  - Kateel River pointed out by community on the Aquatic Resource Value Map; no comment given on its value rating.
  - Community: Why is the Nulato system not given a high aquatic resource value rating? The Nulato has a lot of anadromous species of fish.
  - BLM: There is more than just the species that went into the model—diversity of fish, habitat conditions, and productivity all went into the determination. Points were given for each factor. We do realize that the creeks and rivers on the east side of the Nulato Hills are important for salmon.
  - Community: Is it because you have two forks of the Nulato River? The Nulato system has some of the most diverse and enormous amount of fish utilized for subsistence in this whole area. The other streams don't have large villages right at the mouth of the river. Fish and Game has it as one of its top monitoring streams.
  - Community: There is a lot of activity from our village on the Nulato River and the Kaltag Creek. The numbers don't seem to reflect the local importance of these areas.

### Grazing

- Kaltag does not have a big interest in reindeer grazing. This is partly because the WACH inhabits this area. Residents have not seen them for a few years, but they have been here.

### Trapping

- The community is concerned about wanting to use BLM's Tripod Cabin while setting snowmachine trail since it is a long, rough trip. Kaltag residents do not use the cabin once the trail is set. Kaltag residents do use the trail to access trapping areas. BLM noted that trapping cabins are discussed in the realty section of the alternative packet.

## Forestry

- The community is interested in biomass energy and there are sawmills in Kaltag, but most trees on BLM lands near Kaltag are black spruce that is not marketable or suitable for biomass.
  - We have sawmills in the community.
  - There is talk of a biomass boiler; there is interest in biomass in the community. Biomass projects are becoming more popular. They are going to burn a lot of timber in our area.
  - Community member requested discussion of wildfire management with BLM. BLM noted that fire would be actively managed.
  - Tripod Flats area is mostly black spruce, with some pockets of white spruce. Most of trees are in areas not suitable for timber or biomass (black spruce mostly grows in bogs and is small and wiry). Trees near Kaltag are not very marketable or suitable for biomass energy.

## Travel Management

- Unalakleet Wild River Corridor is near Kaltag and may be traversed by Kaltag residents. Discussed proposed travel weight/width limits for off-road vehicles. Kaltag resident who works for the Tribal Transportation Program would like to improve local trails. Discussion of low probability for a road within the planning area, though Kaltag may put in local roads not on BLM lands to access activities. Summary of discussion:
  - Discussed some reality shows with the community as an example of large trucks that requested permits from BLM.
  - Community: Discussed race sponsored by Camel Cigarettes using large pickup that proposed to go down the Iditarod Trail that did not happen. Someone, possibly BLM, must have denied their permit.
  - Kaltag is aware of the gross vehicle weight rating (GVWR) sticker on snowmachines and ATVs. Snowmachine travel is well within proposed vehicle weight limit restrictions.
  - Community: Do you have a feel for how popular side-by-side OHVs are becoming in this area? BLM did not think they were very common currently. One community member noted seeing them in Unalakleet.
  - Community: A lot of these limits do not apply to Kaltag in summer time. You would have to cross the Kaltag Creek twice to get out to BLM lands. You would not want to cross salmon creeks. The issue for Kaltag would mainly be in winter.
  - Community: I heard near Big Lake that they were enhancing the Iditarod Trail. Is the BLM involved in that? I work in the transportation department here in Kaltag for the Tribal Transportation Program, and I am interested in trail improvements. Is there any other way we can enhance trails aside from federal resources?
  - BLM: For the Iditarod, you would work with the BLM. There may be some funding through Tribal Transportation Program. BLM Iditarod specialist has been out here and other areas to work with communities and discuss maintenance.
  - Community: There has been talk for years about a road to Unalakleet. Will we ever get that road? It is very hard to get a road permitted along a Wild and Scenic River like the Unalakleet River. Perhaps a road could be built along the hills.
  - Paimute Slough to the Kalskags (AVCP proposed road) is a potential road route. The road is far downriver from Kaltag, but Kaltag could see more traffic along the Yukon River if this would be built since more barges would be coming from Fairbanks. This road is not foreseeable to be built in the near future.
  - Community: What if you find some kind of oil or gas? Would you put in a road? BLM discussed the Donlin Gold mine project, and how they looked at putting in a road to the mine. They ended up proposing a pipeline since a road was difficult to permit and build.

- Community: Kaltag puts in roads to access activities. At one time we talked about a road to 8-Mile Flat, which is short of BLM land. Discussed that Kaltag could still install local roads on corporation land or other areas not owned by BLM.
- Community: How far out is BLM land from Kaltag? A community member noted about 17 miles away.

### **Iditarod Trail**

- Community confirmed historic importance of Kaltag Portage, and community pride in the Iditarod Trail. Summary of discussion:
  - Iditarod Trail goes through Kaltag.
  - There is not good timber near Kaltag in the Iditarod Trail corridor.
  - Discussed vehicle use on Iditarod Trail.
  - Brief discussion of Kaltag Portage. Community members noted Kaltag Portage is pretty famous and was used in 1925 Iditarod ceremony and used in the Gold Rush. BLM discussed that the RMP would likely withdraw the Kaltag Portage from potential mining leases.

### **Minerals**

- Kaltag has a very low possibility of mineral development. There is a coal deposit near Kaltag, but there are few facilities in the area to support its development. Summary of discussion:
  - There is a known oil/gas basin (Galena Basin), but potential for commercial development is very low. There are coal deposits near Kaltag, which also has a low potential for commercial development.
  - Community: There are two areas of coal near Kaltag. One is an outcropping at 9-Mile near Nulato. It is a narrow band of about 4-5 feet. The other is about 25 miles south of Nulato. Community member described how he gathered a few buckets of this coal, and tried to burn the coal in his stove last year without success.
  - Community: Do you have any current permits for placer or hard rock minerals anywhere in the Kaltag area? No, the Kaltag area has a very low potential for mineral development. The majority of mineral deposits are much further south of Kaltag. Downriver, there is the Stuyahok Mine near Russian Mission.
  - Community member noted a historic mine near Kaltag near the Bonasila River. Ernie Chase, the owner, was killed in a plane crash and the mine is no longer in operation.
  - Community: If someone was going to come into the area for mineral development, would you notify the community? Yes. This RMP guides general management decisions. There would be another step of review and communication with the community if there would be a mineral development permit application. BLM could set stipulations for developers to follow.

### **Outfitter Guides**

- There is one Kaltag resident who is a registered sport hunting guide. This provides a source of local employment. While not an issue in this area, Kaltag has heard from other areas where sport hunters compete with subsistence hunters. Summary of discussion:
  - BLM: Do you get a lot of sport hunting in this area?
  - Community: There is one registered guide who lives in Kaltag. The guide, Earl Esmailka, is the brother-in-law of a meeting attendee. Community member noted importance of sharing resources. Community member noted importance of Earl's guide service, and that he hires locals.
  - Community: What do you do about people going across BLM lands to access their own lands? BLM authorizes for guide use areas (GUAs). BLM is proposing to manage a certain

number of guides per GUA to alleviate pressure amongst sport hunters and between sport and subsistence hunters when GUA is on BLM lands.

- Community: Have heard of Koyukuk complaining of a lack of moose meat, and of Fairbanks guides competing with subsistence uses along Koyukuk River.

### General

- Suggestions to combine BLM meetings with communities along the Yukon River (for instance, could have a meeting with Grayling and Kaltag in the same day or with Holy Cross and Shageluk in the same day).
- Donna Esmailka with the Kaltag Tribe brought a letter she received in the mail from BLM about permitting activities for TERRA-Yukon microwave repeater towers. Donna voiced Kaltag Tribe's support of the Terra-Yukon project to BLM staff.

## Grayling, March 5, 2015

### Attendance:

24 residents attended the Grayling community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior (BSWI) Resource Management Plan (RMP). Bureau of Land Management (BLM) representatives provided a presentation, discussion time, and a sharing session.

### Issues and concerns raised:

#### BLM Land

- BLM staff noted the recent boundary change for the BSWI planning area. Grayling asked about access easements through Native corporation land, and BLM briefly discussed 17(b) easements. Discussion of proposed Public Land Order (PLO) areas, leasing potential, and clarification of US Fish and Wildlife Service lands and BLM lands. Summary of discussion:
  - Question on access corridor requirement to cross Native allotment or corporation land to access other lands; in particular asked about access to two townships behind Grayling. BLM discussed history of ANCSA 17(b) easements that were based upon historic travel routes. BLM could research specific 17(b) easements if Grayling would like more information about particular ones.
  - Community: The Eastern Interior Plan said there was a very low potential for development, and opened up a lot of the land to leasing. This does not make sense to me. The land should be open to leasing or closed to leasing based upon what is right for the area, and not based upon mineral potential.
  - BLM: Around Grayling there are some withdrawals that close certain uses. Lands closest to Grayling are closed to mining. A little further out from Grayling, lands are open to mining/leasing.
  - Community: Question on presidential action for oil and gas located on the Yukon Delta National Wildlife Refuge. Does this have anything to do with North Slope presidential oil and gas decisions?
  - BLM: No. The BSWI RMP just makes recommendation of areas to be open or closed to mining, and considers public input. The Secretary of Interior would change PLOs open or closed to mining. Discussed avoidance vs. excluding for proposed projects.
  - Community: What kind of withdrawal is on land closest to Grayling? PLO 5184 is closest to communities in the BSWI planning area. PLO 5184 removed lands for Alaska Native corporation land selections.

- Community: PLO 5184 does not allow any oil and gas mining or leasing? Yes. There are 2.4 million acres of this PLO in the BSWI planning area. It is shown with green hash marks on the map.
- Further out from communities, BLM lands are open to mining under PLO 5180.

### Wildlife

- Grayling is not interested in reindeer grazing. The community confirmed that there are not many caribou in the area. Brief informative discussion about wood bison introduction, and the community noted the potential importance of wood bison as a hunting resource for future generations.

Summary of wood bison discussion:

- Community member asked about wood bison introduction. Wood bison would likely end up on BLM lands. The State will allow hunting of the population on BLM lands. Hunting limit will be low at first, but may increase as the wood bison population increases. Wood bison are treated as a nonessential experimental population.
- Wood bison will provide hunting opportunities for Grayling now, but the wood bison could be important to hunting by future generations.

### Fish

- BLM explained the process to develop the aquatic resource condition maps.

### Forestry

- There are sawmills in Grayling. Biomass was a concern raised during scoping.
- Discussion of wildfire and wildfire control by request of Grayling. Summary of discussion:
  - Clarification that Alaska Fire Service manages fire – this plan will not go into large level of detail on fire management. This plan will cover when it would make sense to fight fire.
  - Some meeting attendees are ex-firefighters.
  - BLM is aware of state cutbacks for Alaska Fire Service program.
  - Active management of wildfire on BLM lands if it is close to communities or threatening lichen habitat relied upon by caribou.

### Permits for Personal Use

- A plan alternative proposes a free permit to collect personal use on BLM lands. Summary of discussion:
  - Do I need a permit to get house logs? Yes, you would need a house log permit.
  - How is paperwork for the permit and for reporting? Ones I have seen are fairly simple— usually just one piece of paper front-and-back. When use is complete, the permit is collected by BLM and to report where things were collected, to keep track of use.
  - Comment written on form and submitted at meeting: Many rural people do not have email access, and there would be a lot of unreported use. There would be people who would use BLM land, but not bother with permitting or reporting.

### Travel Management

- Grayling residents are aware of the gross vehicle weight rating (GVRW) sticker on off-road vehicles, and BLM discussed proposed travel weight and width restrictions for off-road vehicle travel for different alternatives. BLM answered a question about why vehicle weight and widths decrease in summer when the ground is not frozen and more prone to damage. Grayling noted 4-wheeler damage in a blueberry harvesting area.

## Minerals

- Grayling has a very low potential for mineral leases because there are very few facilities. The community and BLM are aware of coal deposits north of Grayling. Grayling would not want coal deposits near town to be developed. There is an oil and gas deposit on refuge land near Grayling. There is a very low likelihood of it being developed, and would likely take federal action for it to be developed. Discussion summary:
  - Community: We have seen coal outbreaks along the river. They are north and very close to Grayling. We don't want it developed. The coal does burn.
  - BLM: BLM is aware of the coal deposit Grayling brought up if it is the one closer to Kaltag and Nulato. The coal deposit is mostly on Native corporation land, and not BLM lands. It can be for local use. BLM will leave a map of coal deposits and provide a summary of PLOs.

## General

- Who will make the management decision? Who will make the final decision? We are taking public comment now, but Alan Bittner (BLM Anchorage Field Office Manager) will offer the RMP to the BLM's state director for approval. We have not yet written the plan or made a decision on the alternatives.

## Bethel, March 10, 2015

### Attendance:

10 residents attended the Bethel community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior (BSWI) Resource Management Plan. Bureau of Land Management (BLM) representatives led discussion time around maps and a sharing session.

### Issues and concerns raised:

#### Forestry/Timber Resources

- Responding to discussion regarding the difference between personal use and commercial use, a resident noted Napaimute was selling firewood, substantially more than 10 cords. This is a commercial use and the source of wood is from corporation lands.
- Would the permit (commercial or personal) be for each season? Yes, each year. However, much of the wood harvest areas that are located near the river have been selected by the state and corporations.
- A family from Stony River was gathering about 25 cords of drift wood. They went all the way down to Eek.
- A guy I know wants to go upriver and do some logging. A lot of this maybe needs to be made more accessible so people here know how to get the information. BLM responded, the answer depends on which land you want to use; the answer could be entirely different on state or corporation lands. The resident replied, it would be great if the BLM, state, and corporations got together and made similar rules.
- Are there BLM lands between Bethel and the Yukon? People like to go get wood. They travel from the coast to the Yukon to get their wood. BLM responded, we have not talked about an overland route; we talked about floating it down from as far as Stony River.

#### Subsistence/Wildlife

- Bethel residents sometimes go moose hunting on BLM lands, which are a distance from Bethel.
- For subsistence, is there a federal hunt? Yes.

- In the Innoko Bottoms area, there is a proposal to create wildlife conservation area. Is this something Bethel residents would support? Yes, meeting participants expressed support for stipulations to restrict cutting of willows/browse for moose.
- Meeting attendees expressed general support for restrictions for permitted activities that would affect browse, near wetlands or near river bottoms.
- Musk ox populations are perceived to be increasing; more animals have been seen in the Bethel area in recent years. Discussion related to this topic:
  - If someone sees a musk ox, they go out and kill it. We were told by a lot of federal people that we are poaching.
  - There were 16 musk oxen in this area. There were 7 in the Johnson area, but they were not counted. They haven't counted moose in this area since the moratorium. They had a hunting opening last year and the quota was filled in 4 days. There are lots of moose, but they are not counting them. The first time they opened a 10-day hunt, they didn't fill the quota. There are more musk oxen now, and the hunt was finished quickly. If bison are coming down from Nome, there are a lot of willows in that area.

## Mining

- Should we restrict mining or development in moose habitat in this area? Yes, it will likely just tear up the land.
- If you go to Tuluksak, they will tell you the history of the Nyac mine. There has been a lot of work and restoration activities for that site. For the longest time there were no fish in that river.
- There are restrictions on state land, for example, you cannot change a salmon stream. Does BLM have similar restrictions? For mining on BLM land, are the restrictions similar to restrictions from state land. Are the permit processes similar? BLM responded, there are 3 new instruction memorandums for placer mining. They no longer do placer mining in the lower 48. For the BSWI plan, we are considering management alternatives that would allow only a certain percentage of an area to be disturbed by placer mining at any given time. The mined area must be restored before moving to a new segment. For example, at Nyac, they kept moving from segment to segment, but that project was not required to do restoration before moving to the next segment.
- Tailings, how many miles wide and how many miles long? On the moose level and on the bird level, they don't know how to read. Are they going make a sign saying birds do not land on a tailings pond?
- Concern was expressed about potential impacts on wildlife due to mining activities at the proposed Donlin Gold Mine. Discussion summary includes:
  - With the proposed development of the river, BLM has nothing to do with that. But BLM has property in the vicinity (of proposed Donlin Gold Mine). I know they have been doing exploration up there for a long time, but they have not been blasting yet that I know of. Is the blasting explosives or choppers going to have effects on wildlife?
  - BLM responded: They will analyze impacts to wildlife in the EIS. BLM has the proposed pipeline location on one of the maps for reference. Our part in the Donlin EIS focuses on the permit application for the pipeline.
  - I bring this up because I do a lot of communication with Pebble Partnership and in the Iliamna area, about whatever they are doing with choppers, and digging up, and exploring. People in the Iliamna area people have to go further now to get caribou. Are people here going to have to be travelling further, just like our neighbors in the Iliamna area?

## Fisheries

- The state regulates diversion of water, even on federal lands.
- Residents are concerned about fish populations. It's not just salmon, it's also whitefish, blackfish. Many streams have not been inventoried.
- If BLM requires inventory of fish prior to any kind of stream disturbance, are residents supportive. Meeting attendees expressed general support.

## Wild and Scenic Rivers

- What about Wild and Scenic Rivers? There's one that flows into Yukon near Andreafsky. Does BLM designate that? Yes, but the only one we have now is Unalakleet. There are 23 rivers are eligible; there is another step to determine suitability. We hope to finish the studies a year from now, when they are released with the draft plan.

## Travel Management

- The Association of Village Council Presidents (AVCP) is looking at corridor road planning between the Yukon and Kuskokwim rivers. BLM replied, they haven't settled on a route yet that would cross BLM lands. We looked at analyzing a potential route in this plan, but it is premature, because there is not a firm proposal at this point.
- We are looking at using that road to partner with the barge companies to do back hauling for recyclables. There are possible plans to use that AVCP road corridor. There are already plans going on to possibly use that corridor. Connexes will be stored in that area with lead acid batteries, Freon, and contaminants that will be removed from the villages. We need to consider many risks potentially associated with that road.
- It's easy to make a regulation regarding travel management, but hard to enforce it. Even if there are regulations on the books, it's not like there is going to be someone out there watching. It's more of a gesture. That's a pretty vast area.
- Concern was expressed regarding use of all-terrain vehicles (ATVs) and damage to tundra and subsistence resources. Summary of discussion included:
  - There are some villages that are riding around on the tundra in the summer with their ATVs and snowmachines. Should we have some rules about that? Should we have designated routes? Go on the beach, not on the tundra. It takes 100 years for tundra to recover. I'd rather see no travel on the tundra. We have been trying to educate people to please not use those on the tundra at all. We could make geoblock roads on the tundra for ATVs. We could encourage the communities to make regulations and fine or take away their ATVs. I know that they will get really upset at me when I bring this up, but there is a legitimate reason to let them know that it is the wrong thing to do.
  - BLM noted that 17b easements exist, allowing access across corporation lands to BLM lands. How should BLM lands be managed for ATVs that access via the 17b easements? Just putting weight and width limits can still cause damage to the land.
  - Let the ANCSA villages know that we don't want the land to be damaged. Of course you have to have a route. They can use an environmentally safe road. Have designated trail in tundra areas, with no overland travel. We are going to start losing the geese that lay their eggs there. Once that area is damaged, they (geese) are not coming back.
  - BLM responded, we have had discussions about travel only allowed on existing trails or roads. The issue that comes up is subsistence.
  - The reason we are trying to protect the land is because of our subsistence resources. There will be somebody out there that will say, "How the heck can I go get the food?"

Use the route! You can walk! If our way of life is so doggone valuable, why are they trying to run around on an ATV when we can walk like our ancestors did?

- BLM staff noted that the agency is caught in the middle. BLM cannot get in the way of someone accessing subsistence resources. What does that mean is the bottom line? Can we regulate ATVs by weight or designated route those subsistence users have the right to access?
- Use your BLM markers to establish the route.

### Areas of Critical Environmental Concern

- Are you aware of any endangered species in this area or on the Kuskokwim? No. The Endangered Species Act would take over if there were.
- A resident noted that it looks like there are some ACECs that are overlaying the coal area. BLM agreed and noted the ACECs established in the last planning effort may or may not be retained. The most important thing in those areas is salmon rearing, even if coal development is allowed in the area. There are some areas near Kaltag or Nulato that could be developed for coal. There are a couple other little pockets. It's pretty unlikely oil and gas development would occur.

### General

- There are always many acts. What about the Migratory Bird Treaty Act? We are concerned about Kuskokwim salmon. What does the book say? Any kind of problem we run into, they say, it doesn't say it in the book. There are all kinds of regulations on different things.
- What is the purpose of these meetings? It says "resources." Do you want to know what kind of resources the tribe needs? ANCSA villages? BLM responded, the plan will direct how we will manage these lands for the next 20 years; it will be our guiding document. The protection for moose browse that we discussed earlier. If that is adopted in the plan, the manager would not have discretion; browse would be required to be protected. We are asking communities what they are interested in seeing in the plan.
- Is the state going to know what your plan is? Yes, so are the refuges, the native corporations, just like the public.
- How many people participated during scoping? 8. For a 20 year plan? BLM responded, the BLM lands are farther from Bethel, so this planning process may not generate as much interest in Bethel. In the smaller communities closer to BLM lands we are getting good participation. The online open house is available on the project website. We expect to visit communities again during the release of the draft plan.
- With a proposed pipeline from Cook Inlet to Donlin, and TERRA GCI broadband, I don't get this. What are you expecting to hear from the tribes regarding management that you have now? BLM responded, what we have now is an old framework plan and it does not touch on issues that people care about. For example, in the old plan, we have no restrictions to protect moose browse. We are looking for information for the new plan.
- Discussed Public Land Orders (PLOs) – These are withdrawals, to allow for selection conveyances to take place without encumbrance. Do we recommend retaining those withdrawals or lifting them? Most conveyances are complete and we have recommended removing the withdrawals. The Secretary of the Interior has not taken action on those within recent years. For example, if this high mining potential were on BLM land, there may be a push to remove those withdrawals.
- Coastal erosion, due to climate change – what are your plans for that? What are you going to do to protect your lands that are eroding into the ocean? There's a lot up there by St. Michael's and Unalakleet? Some studies show that in 50 years, that whole area will be covered in water.

- Wood bison will be introduced. Will that be on BLM land? Will it be federally managed? BLM responded the state is handling the wood bison release. They will be released on other lands, but will likely eventually end up on BLM land. The US Fish and Wildlife Service declared non-essential experimental population. They will not be considered a threatened species, unless they go onto a National Wildlife Refuge. The state is expecting they will be used for hunting and subsistence purposes. The state will determine when they will be hunted. On Native corporation, BLM, state lands, and others, they are just another species.
- Did you bring this to Yukon River Watershed Council? They are on our stakeholder list; we will check.

## **Kalskag, March 11, 2015**

### **Attendance:**

16 residents attended the Kalskag community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior Resource Management Plan. Bureau of Land Management (BLM) representatives provided a presentation and listened to community comments and discussion.

### **Issues and concerns raised:**

#### **General**

- Your vision statement is very urban. Wilderness is our home. We are the fourth world. We are not rural; we are in bush Alaska. People in urban areas make these things without living out here. Agencies that come out here that tell us how to live. If you really want to understand our subsistence way of life, you have to live out here, and use those experiences for the rest of your life. BLM response: We don't live out here. Coming out to visit is one of the ways that we can begin to understand how you use the land. We have a responsibility to figure out how to manage these areas as best we can. We will do our best to incorporate your input.
- What kind of relationship do you have with the National Wildlife Refuge System? BLM response: They have a different mission and their own planning efforts. They are a partner with us on this planning effort, paying attention to buffer areas, where their land is close to ours.
- Do you have any regulations for a spill and what kind of a response that might be required? Between here and Paimute is God's country. On that road between the Yukon and Kuskokwim Rivers, if they are hauling fuel, what kind of spill response might there be? BLM response: Whenever anyone makes a proposal that involves transporting or storing large quantities of fuel, the Environmental Protection Agency (EPA) requires a spill plan. It focuses on how to prevent spills, but then if a spill occurs, how to handle it. We require a plan to be in place before we permit activities. It requires reporting to the Alaska Department of Environmental Conservation (ADEC). It is an established program.
- You could do this whole thing in a week, not in 2 hours. There is so much to talk about!

#### **Travel Management**

- I see National Trails on your list of topics. What about winter trails? BLM response: That's under Travel Management. We manage 17b easements through corporation lands and routes across BLM lands.
- From here to Paimute, and from here to Russian Mission, we use those trails. The safety and marking is important.
- Who do we contact for the possibility for designating National Historical Trails? Congress designates them. We can recommend them in the planning process. Kalskag to Russian Mission and Kalskag to

Paimute, these were commercial routes, used for commerce before statehood and before territorial days. There are remnants of travel from those days. Some of these trails are really in need of repair. BLM response: Some of those historic trails that are not part of the Iditarod may be suitable as historic trails. The Iditarod National Historic Trail is not just Iditarod race route. It is part of a network. We will look at these routes to see if they are connected. We can see other trails being historic.

### Invasives

- Invasives? Are you talking about spruce beetles? BLM response: That topic refers to any type of invasive species, including weeds.
- Are you seeing invasive species move more north and west? BLM response: They go where people go, and we are looking at ways to prevent dispersal of seeds. For example, for the Iditarod race, they haul in lots of straw for dog bedding. We require them to bring in weed-free straw so that weeds are not introduced along the race route.

### Vegetation

- Does vegetation include edible plants and berries? BLM response: Yes. On the subsistence side, our responsibility includes wildlife habitat and vegetation is also an important part.

### Fish and Riparian Areas

- What about whitefish spawning areas at Whitefish Lake and Whitefish Creek? Why do you think about sheefish spawning but not whitefish spawning? Are those on BLM land? BLM response: It looks like those are on the refuge, managed by the US Fish and Wildlife Service.
- What is riparian? BLM response: That area close to water, it is swamp lands, near rivers and creeks. It is usually good habitat for animals. Riparian areas support willows and that sort of habitat important for moose. We are looking at limiting the amount of disturbance in riparian areas at any given time. We are considering developing special management areas or Areas of Critical Environmental Concern (ACECs) for some riparian areas, such as Innoko Bottoms.

### Travel Management

- Our surface land is owned by The Kuskokwim Corporation (TKC). If they go on trails there, will you follow the corporation's rules, so it will be the same? BLM response: Not necessarily, but that is a good point. We are hoping to coordinate with adjacent landowners as we develop this plan. We want something reasonable that does not have too much impact on the landscape. Subsistence nowadays is usually by machine. How big should that machine be? Not that we want to set so many rules, but we want to protect the land.
- For example, on Copper River, you can only have 4-stroke motors. Is that on BLM? BLM response: No.
- So the state does all the rivers? BLM response: The state manages all navigable waterways. BLM manages land and non-navigable waterways.
- Maybe there should be no overland travel in the summer. There are two established routes: Kaltag to Russian Mission and Kaltag to Paimute. Those are historic routes. We cannot go off of those in the summer. BLM response: Should we limit travel to those routes? Community response: Yeah! We want to protect that land. We have no control over nature. This is the first winter in 3 years that we have had snow. You don't need paper regulations. We follow nature. BLM response: You do and that is appropriate; we need to make land use regulations.
- When it's all thawed out, common sense says you don't go back there. When it is frozen, it's different. I go back to Big Lake in the summer in my snow machine and it doesn't tear up anything. It has a wide track and I stay on the trail. Use common sense. I don't think somebody is going to come

out from lower 48 in the summer with a bunch of 4-wheelers. BLM response: There is a 17b easement leaving town, which provides public access. How can you stop someone from using it inappropriately? This plan could help to limit those types of uses.

## Forestry

- We use drift logs from the beach after breakup. We get smoke wood, but we do not go all the way to Stony River. We get wood on corporation lands, not on BLM land.
- BLM asked: Are people using BLM lands for cutting firewood? Community response: We don't know where BLM lands are.
- BLM asked: We are considering free permits so we can get information about what timber is coming from BLM land. A lot of people think BLM land is along the river, but BLM land is pretty far back from the river. It seems like the closest area to the community is about half the way to Aniak. Do you have any thoughts about requiring a permit for subsistence or personal use? How would you feel about that? We realize it could be burdensome. Community response: What is the point of getting a permit when we don't know where BLM lands are? How are you going to get the permit, where would they be available? BLM response: Yes, that is something we have not answered yet. Harvest reports would give us some information about use of timber resources.
- On that one (slide 23), go with #3, commercial harvesting would not be permitted along the Iditarod.
- I've seen clearcutting in Washington. They have a hole in their head. Why would anyone do that? The wildlife, fish, plants, and berries all benefit from the forests. Down there, they have to re-establish or replant? BLM response: It depends. If there are enough trees left, it regenerates on its own.
- There's not enough timber in this area to have commercial harvest.

## Mining

- Discussion of placer mining disturbance to riparian areas included a question from BLM regarding potential future management. BLM is considering limits to the percent of a watershed that is disturbed at any one time. Placer mining operations would be required to reclaim areas before moving on to adjacent areas. Would you support that kind of concept? Community response: Our subsistence is so important to us, why even disturb the spawning areas? We are having pressure to not fish. Why even disturb a stream for salmon spawning? There are many impacts in the high seas; they are disturbing everything, even the bottom fish. It's common sense. If you are destroying the spawning grounds, you are destroying the species, and you are destroying our subsistence. Those fish go back to where they were born. Why allow boats to go way up those little streams where fish are spawning? They snag fish and stuff like that. They shouldn't be disturbing fish once they have reached their spawning grounds.
- Some of those streams we may not go there in the summer, but maybe we use an area in the winter. If they say there is no trespassing on this land, will it affect our access to an area? BLM response: If we put limits on mining or other activities, it will not affect subsistence access.
- BLM asked: What do you think about setting limits to how much area is disturbed in a drainage by placer mining at a given time? Does it make sense to have only a certain amount disturbed at a certain time? Community response: What is placer mining? BLM response: It's a dredge within a stream, to get the gold out. Community response: It makes sense to put it back. If they are going to allow it, yes, reclaim it. Put it back.
- Spawning areas, regardless of what kind of fish they are, I would not allow anyone to disturb it. Have you ever been to Nyac? That is 30 miles of devastation, from one side of the drainage to the other. It's unreal. That river has not recovered. They disturbed the headwaters. It's a crime. You cannot

reclaim nature; there is no way to put back what you lost. You cannot regulate, change, or manage nature. No matter how they try to reclaim anything, it will never go back to its original state.

## Lower Kalskag, March 11, 2015

### Attendance:

17 residents attended the Lower Kalskag community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior Resource Management Plan. Bureau of Land Management (BLM) representatives provided a presentation and listened to community comments and discussion.

### Issues and concerns raised:

#### Travel Management

- Where is the Association of Village Council Presidents' (AVCP) proposed road? BLM response: From Paimiut Slough to near Holy Cross. We have seen 4 different possibilities, but it is not a specific proposal. We cannot analyze a specific route when we have not received an application. Community question: Will you go to the villages and see what everyone is saying? Yes. An Environmental Impact Statement (EIS) would likely need to be prepared for the project.
- Donlin Gold will be hauling gravel and materials in for pipeline construction.
- When the mine opens, they will be using the river a lot.
- Are you going to try to regulate a road constructed between Donlin Gold Mine and Aniak? BLM response: We have not seen a proposal for that. If it is proposed, an EIS would be required. A road crossing BLM lands would be subject to BLM management.
- Tundra travel was a topic of extended discussion. Several members of the community strongly supported limiting tundra travel to designated routes, as well as weight and width restrictions. Some residents advocated for more traditional access, walking from designated travel routes to protect vegetation. Continued access to subsistence resources is extremely important. Some residents were wary of limits to ATV access. A summary of the discussion includes:
  - Community: Are you doing any studies with what is happening on the tundra with ATV use? Between Russian Mission and Aniak it is really scarred up. People are going all over the hills and the tundra. You can distinguish between caribou trails and 4-wheel traffic.
  - BLM: Should we have established routes of travel, or allow people to go anywhere?
  - Community: Even with snowmobiles, most people stay on the trails. When they go off exploring, I don't think they realize the impacts they have.
  - Community: Are you going to regulate that? Will you allow permits? Maybe two residents in Aniak are there seasonally, with mines southwest of Aniak. They were going with heavy equipment across the tundra. They thought they were not going to leave any marks, but they did.
  - BLM: What should we do? Do we set routes and require people need to stay on the routes? For heavy equipment, we would not likely allow tundra travel until conditions meet the winter definition, for depth of snow and/or frost to protect the vegetation and soils.
  - Community: With something like that (restricting travel to designated routes), you're going to get a lot of people upset. People use the tundra all the time for hunting and berry picking.
  - Community: Stay on established routes and do not make new ones. Sometimes there might be obstacles, and we will have to go around.

- BLM: Should we keep established routes? Or do we allow people to go all over with vehicles? If we allow people to go anywhere, do we have limits on vehicle size and weight?
- Community: We grew up in this area. You notice big changes from when our grandparents took us out. ATVs ruin tundra and berry picking areas.
- Community: The trails we have now are great and they connect to each other.
- Community: I would like to preserve our subsistence areas and not allow vehicles to be bigger. There are restrictions in other places; in the Holitna, they do not allow anything over 40 horsepower. We do have to make a road/designated route. When people take shortcuts, it ruins the tundra.
- Community: I have witnessed snowmachines hauling a 4-wheeler. It was near where we go get wood. They took it way back where it normally could not go in the summer.
- Community: With the caribou herd, they move around. They do not stay in one route. You would need local enforcement on the trails. If people want to go, they are going to go.
- BLM: Enforcement is difficult. It is a big area. Fish and Game would be a big help for keeping restrictions on trails.
- Community: What would be the logical punishment? A fine?
- BLM: It could be administrative or criminal, so it could have a fine or maybe required restoration.
- Community: In some instances, we will just do it anyway. Some of the rules were passed many years ago. We need to do a Memorandum of Understanding (MOU) to educate our people to work together. I would like to see that. It is not just us that use the trails, it is other villages and we use their trails. We need to educate our young people.
- Community: Would your plan show the original trails?
- BLM: Right now, we are looking at weight and width limits, rather than designating routes.
- Community: My great-grandfather travelled all over. I use his routes. These guys use other routes.
- Community: But we need to use the routes that are already made and not make new ones.
- Community: The Paimiut Trail and the Russian Mission Trail, those routes are used. If I want to go to the Yukon River, I will go by my route.
- Community: I like the idea of showing all the routes on paper. People can see it visually. Maybe you can come to the hunters. These trails are all fairly connected. When we go in the air, we see trails that have been used. We need ongoing education for our young people too. We have to have that. Put those two together with the weight limits.

## Forestry

- Are they planning to take trees down to build the Donlin Gold pipeline? What are they going to do with the trees? BLM response: They are trying to leave as many trees as they can. Wood could be offered to nearby communities.
- Permits would be burdensome for the people that live off the land and normally go to get wood.
- If we go off to the west for firewood, it's not on BLM land.
- Would you have to pay for firewood permits? BLM response: No, only if you are taking it to sell, and only if you are cutting greater than 10 cords.
- Would permits be required for driftwood? No, that is not on BLM land.

- People are using more wood for heating. You are lucky you are paying only \$2.75 per gallon for fuel in Anchorage.

### Fisheries/Watersheds

- Small streams (5th level watersheds) are important areas where people go fishing.
- Aniak River is a high priority; a lot of our fish come from Aniak River. I don't know if it is on BLM land or not. There are a lot of cabins in that area, and that is where the fish spawn. BLM response: If it is on BLM land, we can regulate the numbers of cabins. What kind of cabins are they? Mining? Subsistence? Community response: I don't know if people are keeping track of whose land the cabins are on.
- What about the use of big motors? Sport fishing guides have huge 250 horsepower motors, and sometimes two of them on one boat. You talk about navigable waters. If they did not have the jet units, those rivers would not be navigable. BLM response: They may be going places that are not listed as navigable, due to equipment available nowadays.

### Mining

- Put limits on the harmful minerals that are being drained out into our waterways. I have heard that mercury in our fish is now higher than in the past.
- When they are mining, it should be reclaimed as they go. Or they say we are out of business now, and we are leaving that behind.
- When they are done with the mining, what do they do with the pond? BLM response: The water either evaporates or is absorbed into the ground. The sediment in the pond will be reclaimed, or capped and left in place.
- Will our fish and water still be safe? The spawning grounds are in the Aniak area. Have buffers for mining, staying away from streams.

### Wildlife/Subsistence

- It would be good to set buffers for riparian areas and limits for how much can be disturbed at any given time. If you allow disturbance from mining or other activities, it would ruin the habitat. We do not want to allow disturbance. We want to keep where our animals reproduce and spawn safe, so we continue to have the food. We want to keep our way of life, our food and animals, so we always have a place to go.
- We want to preserve the Kilbuck Mountains, further from Bethel area. That is near the refuge.
- You should permit subsistence uses from village to village. When the state did their allocation, people in the rural communities did not get anything in unit 18 and 19; it went to everyone. The subsistence users should be the first to get the permits. BLM response: I think you are talking about the difference between the state's rural resident requirement versus allocation to communities. Changes to federal permit decisions would need to go through the Subsistence RAC and Federal Subsistence Board. In most areas, they use the qualifier as being a rural resident. They do not have the requirement of being Alaska Native. Community response: Alaska Natives should have more consideration in getting federal subsistence permits. We rely on a subsistence way of life and we want to protect it.

### Lands with Wilderness Characteristics (LWC)

- Is that where they protect the land? BLM response: It is not the level of protection of a national park or a wildlife refuge, but we manage the land a little differently in those areas. Where we are considering this kind of designation is up river (past McGrath), near Denali National Park, and on the east side of Nulato Hills.

- I agree with the idea of LWCs. The area around Nikolai is the area my grandfather homesteaded.

### General

- Grazing – Is that where they are bringing in Wood Bison? BLM response: Wood bison are planned to be reintroduced in the Shageluk area, near the Innoko River. Wood bison are considered to be a non-essential experimental population. They may be released after March 22.
- Townsite lots are not managed by BLM; they are private lots.
- Next time you come, you should put the meetings for Kalskag and Lower Kalskag together, and you should stay longer in the community.

## Russian Mission, March 12, 2015

### Attendance:

7 residents attended the Russian Mission community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior Resource Management Plan. Bureau of Land Management (BLM) representatives provided a presentation and listened to community comments and discussion.

### Issues and concerns raised:

#### BLM Land

- It seems like people around here do not go on BLM lands. We use state and Native corporation lands.
- The land ownership is complex; we do not want to be restricted for subsistence use.
- Talking about a land trade, somebody has a 14(c)1 or 14(c)3 land, one would be homeowners, and the other is city/municipal. Can someone claim BLM land? BLM response: If we identify land for sale or exchange in this plan, we can consider that. If there is something as a community or corporation you want to exchange, let us know. Should BLM put a restriction on certain land that would help us to manage it better?
- The church owns some land in this area, a large parcel around the city.
- Is this plan new, or is there one already existing? BLM response: There is a plan, but it is old. This plan will replace the old plan. We started last year to revised and update the plan.
- Do you have lands in coastal areas? BLM response: A little between Unalakleet and St. Michael.

#### Mining

- Discussion focused several aspects of potential impacts from historic and proposed mines. Concerns were raised concerning management of water quality, potential impacts to spawning areas, and clean-up of contaminated sites. Availability of salable minerals (gravel) is important for community projects.
  - Donlin Gold Mine will be building a pipeline. You mentioned protecting birds and nesting and such. I know they analyze water going down to the Kuskokwim. Does BLM do testing on those sites? BLM response: We are a cooperating agency on the Environmental Impact Statement (EIS) for the project. The application to BLM is for the pipeline and a fiber optic line. We are not responsible for baseline water studies and ongoing evaluation; that will be the responsibility of the applicant and the state. We do not know what the next proposed project might be, but this project will help to make stipulations for management of future projects.
  - We are worried about pollution. We do not know what is coming next. The Kako Mine, on the Stuyahok River, about 14 miles inland and 6 miles upriver. For about 30 years it

was a mine. They dug the ground out, and all of that stream upriver eroded. Can BLM do water samples and tell the public if it is safe? BLM response: Monitoring water quality is the responsibility of State of Alaska, Division of Mining.

- What about panning for gold? Is that allowed on BLM land? BLM response: That is an allowable use on BLM land. A permit is not required for casual use or simple panning. If someone wanted to start a placer mine, or a dredge, then a permit is needed.
- I was wondering about Pebble Mine. There is a lot of conflict. They are mining platinum down near Goodnews Bay. BLM response: Interestingly enough, we have just indicted someone for abandonment of a mine in that area. We are hoping to get someone else to come in and re-mine the tailings, and re-establish the stream as they go. That would help to decontaminate and restore the site.
- Limits on mining sounds like good idea. Stay out of the spawning habitat in streams. BLM response: We would like to see that too! There is still a lot of placer mining interest in this state. In the lower 48, they do not allow placer mining any more. It can completely alter watersheds. We have new guidance for placer mining that we are working to implement.
- What about cleaning up mining for mercury, like at Red Devil? BLM response: Yes, we are working on clean-up efforts at Red Devil and other sites, such as Kolmakof Mine, a smaller site than Red Devil. We did some work last summer where we moved tailings away from Red Devil Creek and developed some settling ponds. It is a temporary fix to keep the tailings out of the Kuskokwim River. We are talking about the proposal for remediating or cleaning up the whole site. We are talking about taking the tailings to a lined facility or moving tailings to Lower 48, but there is risk in the transportation of that material too. There is a conflict of a couple different laws. We are obligated to convey the land to Sleetmute, but we cannot convey the land to the corporation when it is a contaminated site.
- The City of Russian Mission is working with Alaska Native Tribal Health Consortium (ANTHC) to relocate the dump. We need some rock, but we do not have a lot of information on resources in this area. I heard Marshall got funding for a rock quarry. Does BLM do tests for minerals throughout our area? Can we refer ANTHC to you for information? Do you share that type of information? Do you charge for that kind of information? Many villages are expanding and we need more gravel resources. BLM response: I do not know if we have any studies for rock resources in this area. If we have the resource on BLM land, we can authorize it to be developed. I do not know that we have been out looking for the location of gravel deposits. Many times that type of information comes with the development of roads. That information is not typically available in isolated areas.
- We are trying to get a road built to Kako Mine so we can get the waste rock. That would be useful.

### Forestry

- It might be a good idea to have free permits for you to see how much wood is being used. We cannot see the boundaries though. We do not know where BLM boundaries are, so maybe you need to have a little map attached to the permit. People know in general where they are, but they do not know about boundaries. People are used to traditional routes and areas used for generations. What if they are using BLM land all this time and they never knew?

- Most of the land in this area is owned by the corporation or state. No permits are needed in this area yet, unless you are cutting for a business. If it goes to commercial activity, then the corporation would likely get involved.
- The watershed behind town is important and part of that is on BLM land. The community uses the untreated water source. One time we had a fire and it went up that way. It might be good if there were fewer trees around the boundary. Maybe thin the trees in that area. But our animals depend on those trees; do not cut too many. It may be good not to have firewood cutting in that area.
- If someone starts to start something big, they usually ask the landowner and the village nearby for their input. It is village corporation land around the community up to the boundary with BLM land?
- Are there restrictions on harvesting live trees? Or can you only harvest dead wood and drift wood? I think that is the state that might have limits on size and green tree harvests. Cutting of dead or down trees only, unless prescribed the forester? BLM response: I don't know. We have to follow State of Alaska Forestry Best Management Practices. We will look into that a little bit more. In Glennallen, if the forester identifies green trees, they can be cut. Otherwise, it is only dead or down trees that can be cut.
- Russian Mission is looking into biomass heating. BLM response: We will likely address biomass in this plan, as people are starting to get interested in this type of fuel. We may need to find the resources, and then consider potential management for meeting the needs. We usually start with a viability assessment to see if resources are available in the area and how long they would last.
- Which resources are best? Is there a driftwood study about wood that comes down the river? That would be a good source of information for the small villages about alternative sources of heat.
- Usually when you clear an area of trees, they grow back in 20 years. You just don't want to cut too many at one time.

### **Watershed – Area of Critical Environmental Concern**

- We would like to hear your thoughts on this watershed; the management of that land has an effect on your community. You could request that land be part of a Critical Area of Environmental Concern, so it would be managed for the particular resource values. Community response: BLM can be part of our watershed. Watersheds should be areas of Critical Environmental Concern.
- When they first put that water tank up there, it started raining a lot, and it made a deep hole.
- Watch the waters carefully. We depend on them and what is in them. We support you to protect the water.
- We are in favor of an ACEC, especially for fish protection, not landscape wide, but a specific ACEC for an important area. Individualized recommendations for important areas.

### **Subsistence**

- Fish camps are mostly on state lands and corporation lands. They are mostly on allotments and corporation lands. Our corporation owns most of our populated area, fish camp sites, hunting areas, etc.

### **Travel Management**

- We are concerned about the future, about building roads. Do you have plans for that? BLM response. We do not have plans for roads, but we hear about plans for roads. The plan will help to guide our management of proposals for development, including roads. The Association of Village Council Presidents (AVCP) has been talking about a road between the Yukon and Kuskokwim rivers. There are still several routes being considered, but there has not been a permit application to the BLM for a proposal to develop the road. It sounds like you would be in favor stipulations for management of roads. Community response: Sounds good. It is way in the future. We want to make sure they do not ruin the lands.

- BLM is considering restrictions on travel to protect the landscape, which could limit the size and weight of vehicles, or restrict travel to existing routes. Discussion included several topics, including use of existing trails and definitions for winter use:
  - The old trails – we use those with snowmachines to go subsistence hunting. If we don't use the same trails, we will get lost.
  - Everyone usually follows the same trails. We have not gotten into the problem of big vehicles. In summertime we see there are different trails. I like how it is now, where snowmachines and ATVs are allowed but not big trucks.
  - I don't think hovercrafts should be allowed on the tundra.
  - Trails are used for hunting, subsistence use.
  - If you define winter, it has changed so much that sometimes you will not see snow. Maybe the months definition will work the best.
- Make sure that we understand that you are trying to protect the vegetation. Some people cannot read or do not understand well. You need to use simple words. Explain why regulations are made.

### General

- How long is the planning period for comments? BLM response: Technically we are not ever closed to comments, but we try to move along in the planning process too. The comment period is schedule to end on March 20, but we will likely extend to early April because we have had to reschedule some communities.
- We are concerned about oil spills. Ghost ships (abandoned vessels at sea), they shoot and sink them and it makes oil spills.
- Are there restrictions for barging diesel? BLM response: BLM does not manage barging. If fuel is being stored or transported on BLM land, we would have stipulations for fuel management.
- Russian Mission Native Corporation meeting is coming up this week; we can discuss further.

## Aniak, March 16, 2015

### Attendance:

15 people attended the Aniak community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior (BSWI) Resource Management Plan (RMP). Bureau of Land Management (BLM) representatives provided a presentation, discussion time around maps, and a sharing session.

### Issues and concerns raised:

#### Wildlife

- Caribou populations have been low. They used to come by High Fish Lake. They seem to be starting to come back again.
- Whitefish froze this year, possibly because they have no room on the bottom. Maybe it was too shallow this year and they froze.
- There are fewer brown and black bear. They are declining or migrating.
- Moose populations are finally up.
- One time wolves killed a dog in town.

#### Subsistence

- Pike Lake is an important resource.
- There is no interest in reindeer grazing in this area.
- We mostly hunt moose and caribou.

- Did you have any part in the wood bison? BLM: The wood bison will be released this spring in the Shageluk area, and there is a high likelihood that wood bison will end up on BLM lands.

### **Fisheries**

- Big trollers are an issue. It becomes subsistence fishing vs. commercial fishing.
- There are too many chum salmon, and too few king salmon and red salmon.
- There are too many new fishing regulations.
- You should regulate commercial fishing more at the mouth of the river. Regulate the commercial harvest and not the subsistence harvest.

### **Recreation and Guides**

- There are outfitter guides in the Aniak area.
- Written comment received at meeting requested that on jet units, could the BLM stop sport fishermen from operating over the spawning habitat? For instance, the Salmon River, Aniak River drainage, East Fork River, Kichuk River, head of the Buckstock River. These are all tributaries that drain into the Aniak River, which drains into the Kuskokwim River.

### **Wildfire**

- There was a fire by Crooked Creek. Vegetation is coming back the same. We are seeing some game now.

### **Transportation**

- Sometimes barges struggle to get upriver because of gravel.
- We worry about ATV trails in the Russian Mountains. We want gravel on them because vegetation is getting torn up. People should stay on the trail.

### **General**

- Everything is changing now.
- It is good to teach younger generations skills. Note of cultural camp in Kalskag. Meeting attendee in Aniak visiting from Chauthbaluk discussed how Chuathbaluk is trying to start something similar, but do not have a camp site identified. Perhaps it could be on BLM lands.
- BLM staff left information packets with the Aniak Tribe, City of Aniak, and Kuskokwim River Watershed Council.

## **Crooked Creek, March 17, 2015**

### **Attendance:**

21 residents attended the Crooked Creek community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior Resource Management Plan. Bureau of Land Management (BLM) representatives facilitated a discussion around maps, reports, and presentation materials.

### **Issues and concerns raised:**

#### **BLM Land**

- Will this plan cover the Aleutians and Bristol Bay area? BLM: No, there is a separate plan for that area that was just completed.
- We support cell phone towers and other infrastructure that would improve communication in the area.

- Question about restrictions on the Innoko Wildlife Refuge where BLM clarified they do not manage refuge lands.

## Wildlife

- Will this plan change hunting areas? Are you working with federal subsistence on BLM lands? BLM: Staff noted concerns over decline in the Western Arctic Caribou Herd (WACH). The WACH has declined by half in recent years. BLM manages habitat and the Alaska Department of Fish and Game (ADF&G) manages wildlife. BLM follows federal subsistence regulations.
- Notes of caribou in the area about a decade ago, but not recently. Summary of discussion:
  - There used to be caribou in the Crooked Creek area. I am not certain if they were the Mulchatna herd, but they were edible caribou. They were on the south side of the river, by fish camps, and along the Holitna River. It's been about 15 years ago that we saw a caribou herd come through the area. There was a herd about 10 years ago by Napaimiut. There were caribou outside of Aniak about a decade ago.
  - Could people downriver keep them down there now? Now they are by Quinhagak. BLM: I don't think you can necessarily herd them. I have heard up north that the caribou cross the river at various pinch points and hunters know that. Sometimes hunters shoot the first caribou that arrive and they could be lead caribou; still not certain about this.
  - They lost half the herd in one year. BLM: The Mulchatna herd has tremendous variation in how it moves. There are historic variations over the years.
- Aren't there bison by McGrath? Yes, but those are plains bison.
- I have heard about the wood bison being reintroduced. I don't know if they eat the same food as moose. The wood bison will go wherever they want, and it may be different than where they were dropped off. Attendee noted that wood bison do not eat the same thing as moose, and that is why they were chosen for reintroduction. Bison are good food.
- There are some muskoxen in the Russian Mountains right behind Chuathbaluk. There were nine there, and now I am sure there are more.
- Community is concerned about wolf predation. Summary of discussion:
  - Idea to have predator control on wolves by local people who could then sell the pelts for money.
  - We used to see moose on the George River, and now there are more wolves there.
  - We have lost dogs in the village to wolves.
  - Many people view the wolf as a romantic animal to be protected. The Department of Fish and Game needs to listen to us. They cannot say there is not enough data.
  - I remember in the past of men who would find wolf dens and kill the pups to keep the population in check.
  - There is a black wolf that has been around here nearby.
- We had not seen wolverines in the past, but now we do see them.
- We are seeing lynx again.
- There possibly may be more rabbits.
- Black bear predation concerns:
  - There have been some bear hunts here which have helped.
  - We have a huge black bear population around here. We are concerned about bears eating moose.
- Moose observations:
  - There is good habitat in the George River area for moose.

- We find moose with scratches or injured antlers sometimes. We have seen rips in the ears from wolves and bears. Caribou sometimes have the same thing. We have observed more moose than there used to be that have injuries.
- If it was cost effective, they could drop over-populated moose from Anchorage to our area.
- The old trails are connected. If something happens in the Holitna and the George, it affects us too.
- We use the George River and Crooked Creek area a lot for subsistence.

## Fisheries

- There are too many regulations as it is, particularly on fishing. Summary of discussion:
  - We want more local control for subsistence resources.
  - The people who use the resource know what to do to take care of it.
  - We had to wait to go fishing for king salmon here, but commercial fishing was going on by people from Seattle in Bristol Bay.
  - Don't lump us in with more populated areas. There are not enough people here to make a big dent in fish resources.
  - There was a time when we would just ignore regulations, but now there are too many to do that.
  - BLM: Reminder that we manage habitat, and Alaska Department of Fish and Game permit hunts.
  - We have to break laws in order to survive, and it is going to get worse. If our kids are hungry, we are going to break a law to feed them if necessary.
  - Last year a man went to catch a sheefish for dinner, and got a \$250 fine for fishing for king salmon.
- There is more pike in the area than there used to be. There was always a little bit, but now there is a lot. They are impacting the other fish and wildlife. We have seen pike eating ducklings.
- The silvers are the last decent salmon run we have.
- We are catching more chum salmon than before because we are not using king nets anymore.
- They are taking too many fish in the ocean.
- Fish is our staple.

## Subsistence

- Subsistence is important. There needs to be more federal protection of subsistence rights. Sport hunters can chase game from a plane, but subsistence hunters cannot.
- Last year we did not have any berries throughout the state. What causes this? Weather? BLM: What I have heard is because of the reduced snowpack precipitation has been lighter, and that makes for a poor berry year. There are many other issues that could be involved with berry production, including climate, temperature, and wildfire.
- In recent years have had lots of berries in the area, but last year we had none.
- The men in the community are knowledgeable of terrain from hunting and trapping. Women trap too, but more often pay attention to the vegetation.
- We want to be able to feed ourselves.
- Commercial fisheries have more power because they have more money than us. There is so much waste in commercial fishing through the acceptable bycatch. That kind of waste would be unacceptable to us.
- We want to eat wild foods, and do not want to eat beef or chicken.
- Game Unit 19A is very important to us.

- People must travel farther out to catch food than they used to go. This means more time and money for a subsistence lifestyle. There are fewer animals and we must go farther out. It is a chain reaction--no fish means we have to get a moose, which is more expensive.
- There are cumulative effects of health impacts to us if we eat fewer wild foods.

### Forestry

- We do not like the proposal for a wood collecting permit, including the ten cord commercial cutoff point. Summary of discussion:
  - We are afraid it would lead to harassment and tickets for us. Our experience with enforcement is that they will find a way to write us a ticket.
  - The Crooked Creek Council would protest any kind of permit for wood.
  - As an example a man collected driftwood that did not require a permit. He was hassled by The Kuskokwim Corporation (TKC) and questioned.
  - We do have a sawmill here.
  - We need more logs for houses.
  - It depends on the winter how much wood we need.
  - Driftwood is an important wood source.
  - We don't like TKC permits either.

### Minerals

- An issue with minerals is that the mine is often by water.
- Worries about increased activity in the area from mines on animals. Concerned about increased boat traffic and plane activity.
- We support the proposed Donlin Gold Mine because it would bring jobs and hope for the future, in particular for the young men in the community.

### Wild and Scenic Rivers

- We are worried about the spillover of regulations from other rivers to our river. We do not want the rivers we use to become non-motorized areas.

### Sport Hunting

- Resident voiced opposition to proposed aircraft flying height regulations. Summary of discussion:
  - Leave the planes alone—we need them to get in and out. BLM: These regulations would be for flightseeing and sport hunters utilizing BLM lands, not for general flights. These permits would not be for planes for health/cargo, but would be for guide transporters.
  - People depend on planes for things, and we do not want them to go away.
  - We do not want flight operators to be hassled.
  - The proposed flight regulations for aircraft transporters do not seem to be enforceable. If you fly around to enforce them, then the enforcing plane is disturbing planes.
  - We do not want regulations on the height that aircraft may fly; it seems like this regulation would be pointless.
  - We would spend money trying to enforce something we cannot do much about. Most people will fly at a high height, but at times you need a plane to fly lower for safety. Most people would fly at height because they use the resources too.
  - We are worried that all operators would be hassled. The intent of the regulation would not occur. We are worried that enforcement would be broad and overreach the intent. It is best to not have an official regulation and maybe just educate people about flying at a proper height.
  - Initial regulation could lead to more rules in the future.

- What is in place now works. We do not need more federal control.
- I am against sport hunting for trophy animals.
- A couple decades ago we heard of transporters who said they were sharing expenses, and they were able to get into Unit 19A.
- Don't regulate sport hunting to the extent that it would affect subsistence hunters.

### Cabins

- We would be interested in emergency shelter cabins. We have heard of those in other areas.
- BLM: We do not permit subsistence cabins.

### Travel Management

- The proposed Donlin Mine road would be private, but we all know we will cross it at some point. We know the port site would affect us.
- Concerned about additional regulations on ATV use. Summary of discussion:
  - A resident is worried that Alaska will become more like Montana and have greater regulations.
  - How would ATV use affect streams and the water? BLM: Crossing streams may stir up sediment and salmon eggs.
  - Around here, rain may do more damage than ATVs.
  - I can understand regulations for more populated areas on ATV traffic, but here there is not enough use to cause much damage. Why put another layer of regulation? Enforcement may end up not letting anyone use an area.
  - What does no surface occupancy mean? BLM: This refers to infrastructure such as mines.

### General

- The river freezes later than in past years, and there is open water earlier.
- There are too many laws and regulations. They are looking at us more and more because things are changing quickly. Everything we do is being eroded.
- We are worried about interpretation of regulations. The laws and permits you propose may not be enforced in the manner you thought.
- If something is working, don't change it.
- Do no harm to the people who live here.
- For Crooked Creek, less is more.
- It is intrusive to have our boats inspected.

## Chuathbaluk, March 18, 2015

### Attendance:

14 residents attended the Chuathbaluk community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior (BSWI) Resource Management Plan (RMP). Bureau of Land Management (BLM) representatives provided a presentation, discussion time around maps, and a sharing session.

### Issues and concerns raised:

#### BLM Land

Around Chuathbaluk, it is mostly native land. We do not use BLM land much now besides the block on the other side of the river. There is BLM land near Mission Creek.

## Minerals

- Residents commented on the pros and cons of mines and mining. The group talked mostly in general terms, but did mention the proposed Donlin Gold Mine and the former mine in Red Devil. Mines would bring jobs and there are standards in place for mining companies, but there are worries about impacts to natural resources and the community. Summary of discussion:
  - There are many young people without work. I am not totally against mining because it would offer jobs. I am not totally against mining if it is done right. We live in an age where we do need money to get the things we need. Done sensibly, I think it would work to have mining.
  - Do you have guidelines in place like Donlin that dictate hiring practices and mining practices? BLM: Donlin is on Native corporation land, and not on BLM land. Donlin does have strict policies for a safe work environment. I have heard of local hiring by Donlin. There are no BLM policy stipulations on hiring for a permit, but BLM may provide other stipulations if we permit a mine.
  - Discussed an abandoned mine in the Mission Creek area from the 1880s. The Hazardous Materials Specialist in Chuathbaluk has been up there to see if there are hazardous materials. He shared photos of the abandoned mine with BLM staff before the meeting.
  - In 2009, there was drilling behind the mountain for core sampling to identify gold deposits.
  - There was some mining upriver and maybe 2, 3, or 4 years ago some fish were dying. Anything to do with closed mine in Red Devil? Any mercury leaking? BLM: The site is a Superfund area and has had sampling that showed elevated methyl mercury and arsenic levels. BLM broadened the sample area to include soils. Tailings will be pulled out of the creek. Consumption guidance recommends limiting bigger, older pike that has been in the water longer and absorbed more mercury. Young people and woman of child-bearing age should limit their consumption.
  - I am opposed to mining. Even though they say it is safe, it can destroy things. How far would studies go if they develop mineral areas on the map? Could things come down to us? I am concerned about downriver effects from mining and things coming to our village. I am concerned about the proposed Donlin mine. BLM: We are involved in permitting the pipeline for the Donlin mine, and an Environmental Impact Statement that analyzes the impacts will be out soon.
  - I had a negative thought that BLM is redoing this plan so that it would allow roads and mining companies. BLM: Congress has to lift withdrawals on areas that are closed to allow mining. This plan can recommend these changes.
  - Would they have to do cleanup activities if the mine is permitted? Could they just leave? In the past companies have said they would reclaim the land, but then just leave it there and it affects subsistence and hunting. BLM: Reclamation is required today. Companies want to maintain their reputation. BLM inspects mines at least once a year, and can require changes for things that are out of compliance.
  - Mines may be a good thing, but there is also a bad side, too. Mount Polley is a recent tailings dam failure. If the Donlin tailings dam fails, the Kuskokwim River will be one big contaminated site and our natural resources will be gone.
  - We should try to reuse stuff that we are throwing away so that we would not have to have mines.
  - Concerned for when the mining resource runs out and we no longer get money or jobs from the mining company. I don't want to be left with nothing in the long term.

- We must look at things from both the negative and positive sides. We can't undo things once done. We may have to move and we may not have the same plants and animals. We should change not just for sake of change. It must be a good change. I want to put in more guidelines for mines.

## Wildlife

- There are too many beavers. Trap all the beavers. They make too many dams.
- Brown bear populations seem to be average. At certain months there are many bear sightings. Berries and fish resources impact where the bears are. Bears are coming down from the hills for fish. There have been some bears right at the door across the river. There was a brown bear by a bedroom window. Berries and fish affect the bears' food chain. Bears are going in later, coming out earlier, and coming out hungry.
- I saw black bears in the hills early in summer, then did not see them, and thought that they were down on the river. We saw black bears when we traveled on the river to Stony River.
- The ladies do not want bears when berry picking.
- We have seen wolves across river and hear them howling. In certain winters packs come into town and eat dogs. We think they may be more stressed.
- Moose are starting to migrate away from this area. There are not many moose that pass through anymore. We don't think willow heath is an issue for moose.
- We have seen salmon with some sort of worm or parasite in them. Have you heard in other villages about tapeworms? BLM: No, we have not heard this. I will pass this information on to our fish biologist.
- Question on design standards for fish passage, and BLM spoke briefly of proposed requirements.
- Series of questions on fish weirs. Summary of discussion:
  - Where are fish weirs, and does BLM work with them? BLM: There is a weir in Unalakleet where we partnered with Alaska Department of Fish and Game. We intercepted every anadromous fish over a six-week period and wanted to know why king (chinook) salmon populations have declined.
  - Do the weirs affect the spawning of the fish? BLM: Alaska Department of Fish and Game are responsible for weirs. Weirs do funnel fish and that gives some stress, but it is very minimal impact to those going upstream.
  - Were there more fish after the weir? BLM: Chinook runs are still less and less each year. There are many theories for why, but we do not know for certain why they have declined.
  - Why are they using the weir? In past there were no weirs, who use them now? BLM: The state did use sonar in the past, but it cannot travel the distance of a very broad river mouth. A weir is inconvenient to local people because they need to use a special gate. Scientists feel there is a tradeoff from the inconvenience vs. the knowledge gained from the weir. In some places, they feel the knowledge outweighs the inconvenience.

## Subsistence

- Some of the scoping comments were about subsistence use near Aniak. We do not travel to Big Lake or Pike Lake very much. There is a Big Lake near Kalskag.
- We are not seeing more muskoxen. We have heard of muskoxen sightings, but we have not seen them. They are mostly down in the Bethel area.
- Trapping is increasing for some residents, but not all. We are trying to bring back trapping.
- We do not know of anyone here interested in reindeer herding, but it may be a good thing to consider.

- Chuathbaluk means hills where blueberries grow.
- Are we able to trap on BLM lands? Marten trapping season just closed, and we are trying to work with students on trapping. BLM: Alaska Department of Fish and Game determines hunting seasons.

### Climate Change

- Residents noted observations of climate change in the area. Summary of observations:
  - Many hands raised in the room when BLM asked if audience had observed elements of climate change.
  - There is gunk in the trees.
  - Last year was a bad year for berries. There have been dry winters and dry springs. In higher elevations there is deeper snowpack, so that is where berries are.
  - There are earlier breakups and later freeze-ups.
  - Sometimes there are second breakups. In November of 2014, the river froze, thawed, and then refroze.
  - With earlier breakups, later freeze-ups, and refreezing, the river has a rougher surface and is more dangerous. We do not get to travel to get medical care or to stores. More things must be flown here.

### Forestry

- Question about rust colored debris floating on top of water one year. We heard it was from an overpopulation of spruce beetles killing trees, and the color came from the trees. BLM discussed spruce tree die-offs from beetle kill.
- We get our firewood from different areas. It is taken farther back from the river and pulled out in winter with sleds.
- Questions and debate about the proposed forestry permit. Community noted that they have adapted to other permits systems (such as for moose hunting), but are uncertain of their willingness to adapt to a forestry permit. Community voiced support for a commercial harvest permit. Summary of discussion:
  - Where would you get the permit? BLM: We have not finalized this yet since it is not definite, but it would probably be online.
  - Would we need a permit to go berry picking? BLM: Yes, it is what is proposed. This is the standard in the Lower 48.
  - So it would be like moose hunt permits. How would you keep track of how many berries or wood is taken? BLM: We do not know yet, but it may help land management if we know approximately where people are getting wood, and what people need and expect to take. We do not want the burden to be greater than the benefits
  - It would be something like budgeting.
  - It would be good for commercial harvesters to be required to have a permit.
  - For The Kuskokwim Corporation (TKC) land you have to contact them if you will be taking more than a certain amount. BLM clarified that this permit would only be for activities on BLM lands.
  - What is this part about surface disturbance and required vegetation surveys? BLM: Surveys would be required for big, commercial operations that would need to build roads to access timber.
  - Concerned of permitting for berry picking. We have adapted to permits for moose hunting, and we could adapt for berry picking. I believe that the tribe can have a strong voice with corporation lands. We could say we are not willing to adapt to the permitting

process within our area. I think about my son who may have to apply for a permit to go berry picking if he has to go farther out to BLM lands in the future.

### General

- How long are you traveling or are you coming again? BLM: We will be back when we take information gathered from the preliminary alternatives outreach period and have a draft plan.
- Is this updating a plan that you have for BLM lands? BLM: Yes. The plan we have now was written in the 1980s and did not have the detail that we are trying to incorporate now.
- When do comment forms need to be in? BLM: April 19<sup>th</sup>.
- BLM: Tribal resolutions are the strongest form of comment. They create a permanent record as part of the land use planning process. BLM is bound by law to give strong consideration to tribal resolutions.

## Anchorage, March 19, 2015

### Attendance:

17 people attended the Anchorage community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior Resource Management Plan. Bureau of Land Management (BLM) representatives provided a presentation and listened to community comments and discussion.

### Issues and concerns raised:

#### BLM Land

- If there are lands with overlapping or connected multiple resources, are these areas a higher priority for management? BLM: There is a lot of overlap of resources on BLM lands. Sometimes lands have a unique characteristic BLM would want to manage differently. For instance, sheefish spawning creeks on the Kuskokwim River provide special habitat that is important to protect.
- Who is responsible for 17(b) easements? Who designates them? Who takes care of them? Who alerts the public that 17(b) easements can be terminated under certain conditions? BLM: BLM is responsible only for 17(b) easements that cross lands conveyed under ANCSA to Native corporations. The easements are put in place at the time of conveyance. The 17(b) easement that access lands owned by other agencies, such as National Park Service lands, may have management authority transferred to them by the BLM. Only the BLM may terminate a 17(b) easement, regardless of the managing entity. The termination of a 17(b) easement is a public process and is an appealable BLM decision.
- Are you planning for state-selected BLM lands in this plan? How will that work in the draft plan? Will these lands be called out separately? BLM is planning for state-selected lands in this plan. All land is considered BLM land regardless of selection status. When BLM gets a permit application, there must be concurrence for state-selected lands and consultation for Native-selected lands.

### Subsistence

- Waste is an issue for recreational and guided hunts. While game waste is regulated by the state, BLM tries to report and prevent violations. Summary of discussion:
  - Subsistence harvesters often look at harvesting in a different manner than recreational users. I hear about problems with waste. The villages use almost everything. Subsistence hunters have found kills with the head removed and the meat wasted. Is there something BLM could do to educate recreation users and get meat into villages? BLM: BLM only approves access, not hunting. The state oversees hunting, and waste is a state

game violation. It is still considered a waste violation if the meat is spoiled by the time it is donated to a community. BLM does notify State Troopers when they see violations, and recommends reporting if people observe wasted harvests. Education outreach is the state's responsibility.

- If meat is handled better, it could help local villages a lot and reduce conflicts between user groups.

## Wildlife

- Have you mapped ranges of sheep, muskoxen, and goats in the project area? BLM: Yes, we have mapped some areas.
- Wondering about the potential for disease transmission, particularly for goat and Dall sheep. Will you identify areas of concern for wild/domestic sheep and goats? BLM: We will work with Alaska Department of Fish and Game (ADF&G) to improve map coverage of herds. BLM would not allow domestic goats anywhere in the planning area because of the potential for disease transmission.
- Do the wildlife alternative concepts for communication towers and power lines encompass wind turbine projects? BLM: They will eventually, but wind farms are new enough that the standards are still developing. The US Fish and Wildlife Service (FWS) and the wind industry are working together to develop wind farm standards. BLM would follow the lead of FWS. There are some standards in place now, and some are currently in development. When BLM permits communication towers, we do take into account the potential for bird kills. One main standard would likely be to avoid major migration corridors.

## Watershed – Area of Critical Environmental Concern

- It looks like a number of the headwaters of the Kuskokwim River are potential Wild and Scenic Rivers. This area is also where the pipeline for the proposed Donlin Gold Mine would be located. Are these things mutually exclusive? Can you have a Wild and Scenic River and also permit the Donlin Gold pipeline to cross them? BLM: These are eligible river segments, and the next step is to determine if they are suitable for a wild and scenic river rating. Attendee: Title XI of ANILCA allows for such corridors in wild and scenic rivers.

## Recreation

- Subsistence and recreation users are sometimes in conflict. BLM is proposing allocation limits on guide operator access permits. BLM is also proposing guide and transporter use restrictions near communities. Summary of discussion:
  - Would the BLM create a guide use system such as the FWS in refuges and NPS in parks? BLM: BLM is proposing an allocation limit on operators. The allocation numbers were determined from the ten-year average of BLM-permitted guide numbers. The goal is to reduce social conflicts through these allocations. BLM is not proposing recommendations for how many clients a guide outfitter may have.
  - If the Alaska state legislature passes a guide concession program, how would that affect things? BLM: These are only recommendations for BLM lands. A state guide concession program would give guide allocation limits for state lands.
  - What is the difference between a guide outfitter and a transporter? There is a perception in the villages that transporters take subsistence resources from communities and do not contribute to economic activity. BLM: A transporter moves clients, typically by boat, plane, or horse. The State Troopers sometimes are confused about their authority to regulate transporters. BLM does require permits for

transporters in the Squirrel River area. Please let the BLM know if you have another area where transporters should be placed under permit, and we can consider limits.

- Are you currently looking specific areas to regulate transporters outside of the Squirrel River area? BLM: We are recommending a no operating radius of 25 miles around communities for guides and transporters. This is a number for consideration, and it is open to suggested changes. You could request the BLM to make a map that visually displays this proposed recommendation. This restriction is only for BLM lands. Often BLM lands are not located near communities.
- Does the BLM have a map of guide use areas? BLM: The BLM has not made one. The areas are the same as the state's defined guide use areas.

### Travel Management

- How did BLM determine off road vehicle (OHV) weight limits? Concerned weight limits are too low. BLM set proposed numbers to reduce damage and consulted the state's generally allowable land use restriction and other BLM planning areas. ADF&G would like the BLM to set one standard for OHV weights in the planning area as opposed to differing limits. Summary of discussion:
  - How did you come up with the 1,500 pound weight limits for OHVs? Did BLM consider safety and welfare in determining this weight limit? I am concerned that this limit would not be high enough for multi-day hunting trips with family. BLM: BLM reviewed the OHV limits in question with the audience, and the definitions for winter and summer travel. The reason for OHV weight limits are to reduce potential for erosion, trail rutting, and braided trails. The 1,500 OHV weight limit is one alternative being considered. There is also a 2,000 pound weight limit as another alternative. Common types of transportation all fall under the 2,000 pound gross vehicle weight rating (GVWR). This weight rating accounts for the weight of a fully loaded vehicle. The BLM's Ring of Fire and Kobuk-Seward Peninsula planning areas proposed a 2,000 pound GVWR limit. A 1,500 pound curb weight limit is the same as a 2,000 pound GVWR weight limit. These limits match the state's generally allowable land use restrictions.
  - Suggestion to go to a pounds per square inch (PSI) rating instead. The original OHV trails were made by bulldozers and rigs with 3 to 4 times as much as the proposed weight limit. Suggestion to expand these weight ratings. BLM: The BLM planning team discussed internally a PSI rating, and decided against it. The OHV access limits would be for casual and subsistence uses. If there are construction activities that would require larger vehicles, that would be authorized separately. BLM wants to separate monster trucks and army surplus vehicles from more traditional OHV vehicles.
  - ADF&G would like to see one standard for OHV weights in the planning area as opposed to differing limits in various sections. BLM: Resource specialists suggested these limits. BLM would like to be consistent with the OHV management policies of neighboring landowners.

### General

- Will you hold more preliminary alternative meetings when all of the resource reports are finished? BLM: Not all resource areas will have a separate technical report. We anticipate four reports; three are finished now and the fourth (about Areas of Critical Environmental Concern) will be released soon. The rest of the resources will be addressed in the draft Resource Management Plan.

## Nulato, March 24, 2015

### Attendance:

14 residents attended the Nulato community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior (BSWI) Resource Management Plan (RMP). Bureau of Land Management (BLM) representatives provided a presentation, discussion time around maps, and a sharing session.

### Issues and concerns raised:

#### BLM Land

- Where are the BLM lands near Nulato? BLM: It is about 12-20 miles to the closest BLM lands. BLM lands are in the hills behind you.
- Walking or snowmachining is the only access to the Nulato Hills. A few guys trap on backside of the village, but lands behind Nulato are mostly savings to come for the future. The Nulato Hills are where animals grow, and it is kind of a protected area because there is very limited access. We never show anyone our trails to limit access.

#### Minerals

- Nulato knows about coal deposits near the community. They are worried about an outside company that would extract nonrenewable resources in a large-scale operation and ruin the land. Nulato is not opposed to smaller-scale mineral developments that would not bring in many outside people. Summary of discussion:
  - We know there is coal back there near Nulato.
  - Nulato's opinion on oil/gas or coal development really depends on how big the project would be. Development brings extra people in. Nulato is just perfect the way it is now.
  - The biggest worry out here is our lifestyle. We have lived this lifestyle since forever. For a company to come in and produce a mine, it is a nonrenewable resource. If our resources are poisoned, we are done for. We are comfortable here. There is no such thing as a homeless or hungry person here in the village. We take care of each other. We do not have much money, but we have food and a home.
  - We need to keep an eye on the state. They too know where mineral resources are located, and they build roads and other infrastructure important to them but not to us. For us, the land is more important than minerals. We cannot eat nonrenewable resources.
  - There was coal exploration conducted near Nulato on Native allotments or corporation land. There are a few outcroppings of coal on corporation land.
  - What is the development potential? BLM: There is some potential for small-scale coal development on Native corporation land for local use.

#### Wildlife

- We just submitted a proposal to get a fishing weir on the Nulato River with Alaska Fish and Game on village corporation land through Tanana Chiefs Conference (TCC).
- What is BLM policy on predator control? BLM: The state manages the animals and we manage habitat; BLM would not have much authority on predator control.

#### Subsistence

- On the back side of the village closer to BLM land, we may pick berries, set a few trap lines, and harvest moose, caribou, ducks, beaver, wolves, and marten.

- There is no subsistence without development. We need some kind of income to pay bills.  
Summary of discussion of costs of living a subsistence lifestyle:
  - It is about \$3,000 per year for electricity plus another \$5,000 for fuel. There are a lot of people who haul wood to avoid the high cost of fuel oil.
  - For snowmachines, it is about \$7,000 for the machine and about \$3,000 per year for maintenance and gas to hunt/fish/travel. It is \$6.10 for a gallon of gas.
  - Energy and store food are the most expensive things out there. We still live comfortably out here. We can live within our means because of our lifestyle.
- The BLM should allow us to hunt moose on their land if it is a low harvest year, perhaps because of climate change in the future. Our subsistence rights are protected federally, but not really with the state. This is just an idea to put out there to get moose somewhere else. There were 17 households in Koyukuk that did not get a moose. We did okay, but this could happen to us.

### Travel Management

- Discussion of proposed roads, most of which currently have little certainty for construction. Roads brought up in the meeting included the proposed Ambler Road, a road to Nome from Fairbanks, and a road to Tanana. Summary of discussion:
  - Where is the proposed Ambler Road supposed to go? BLM: It is north of this planning area. The proposed Ambler Road is an uncertain project with the change in governor and budget concerns.
  - Nulato is concerned about impacts to fisheries from the Ambler Road.
  - BLM staff discussed the possibility of road development being analyzed in the cumulative effects section of the BSWI RMP. The proposed road to Nome will not be analyzed in the plan. The Alaska Industrial Development and Export Authority supports the Roads to Resources program. If projects seem likely to be completed, impacts will be considered in the BSWI RMP.
  - Is there an EIS for the road to Ambler? No. The proposed road was moving toward an EIS, but the new governor slowed down big projects due to funding concerns.
  - Nulato is also concerned about fisheries effects from a proposed road from Fairbanks to Nome.
  - The Nulato Tribe opposed the Ambler Road because it would cross five spawning creeks, only one of which has data. Up to one third of silver salmon spawning creeks could be affected by the road. Silver salmon are important to us and other villages because of the lack of chinook/king salmon in recent years. The silver salmon are saving us.
  - How about the road to Tanana? BLM: We do not have much information about that road; it is also outside of the BSWI RMP planning area.
- Discussion of all-terrain vehicle (ATV) travel management:
  - There are a couple side-by-sides in town.
  - No pickups with big tracks are in Nulato. Trucks would likely be too heavy for this area because we have a lot of tundra. Nobody out here can afford that stuff.
  - The trails we make are usually for local people. We like to keep the country a bit of a secret.
  - Vehicle use in this area is pretty much determined by season. The land around Nulato is mostly wetlands. Argo makes more sense than a side-by-side to facilitate water travel. I worry about damage to the land from Argos. We do see damage areas. The land is alive just like us, and we do not want to kill the land.
  - Do you need permit for ATV travel on BLM lands? BLM: No. We are considering restrictions on size and weight.

- We want to keep trail use to ATVs and snowmobiles. Why not just restrict it now to 4-wheelers and snowmachines? BLM reminded the community to think about the side-by-side ownership mentioned earlier for restrictions.
- Nulato resident brought up idea to have certain routes where travel would be restricted.

### Wildfire

- There is a lot of old feed for the moose, and the beaver are taking new feed. Could you do a controlled burn in the refuge? Do you manage fires? BLM: The refuge is managed by the US Fish and Wildlife Service, and they would have to do a prescribed burn. BLM does manage fires, but would need direction from Fish and Wildlife Service.
- We are lucky that past fires have stopped before Nulato, but if they spread from BLM land to Native land the fires could affect us.

### Watersheds

- The BLM is looking at aquatic values in different watersheds and identifying priority watersheds.
- The Nulato River provides drinking water for the community of Nulato, and is an important resource to protect.
- The rivers around Nulato are important subsistence resources. All hunting and fishing is done near the Nulato or Yukon River. The Koyukuk River is also important in between Nulato and Galena. Subsistence activities are not done in the village, but on the river. The Koyukuk Flats are also important.
- The entire Nulato watershed is important to us. The Nulato River is an important spawning creek.
- There are berry picking areas only accessible by river.
- The river is important for transportation. I would not want to live where there is no river.

### Guides

- Nulato residents see a lot of guide activity in their area. They are concerned about unpermitted guides on nearby refuge lands and impacts to subsistence hunting. Summary of discussion:
  - Who are guys who have guide permits for BLM land in our area? We see a lot of guide use in our area. Hunters that got squeezed out of other areas are now in Kaltag and Galena.
  - BLM: Some are regulated by the state, but BLM has talked about limiting guides and transporters on BLM lands.
  - We often see guided hunting in refuge areas where there are not supposed to be guides. The refuge does nothing about enforcement. We have a hard time with federal agencies and a lack of action. The refuge is only 50 miles away from us. How do we deal with something like that? Guides and hunters are affecting our lifestyle. We cannot have any say over refuge lands.
  - Nulato mentioned prior communication with Kenton Moos, Koyukuk National Wildlife Refuge Manager, who flew over the area in a plane. If you contact him, please mention our issues with guide permit enforcement in the refuge.
  - Guides in Kaltag may go after grizzly bears in the Nulato Hills where there is BLM land. We don't hunt bear traditionally.

### Forestry

- We harvest most of our wood from the river corridor.

- It would be a couple tanks of gas to gather wood on BLM land. It would be more burdensome to harvest wood from BLM land.
- No one burns over 10 cords of wood here.

### Area of Critical Concern (ACEC)

- The November 2013 notes from scoping show a lot of concern for the Nulato River. We get fish and our drinking water from the Nulato River, and it is very important to our community. There is an ACEC on the Nulato River. We would like to expand this area back there if possible. We discussed a wilderness area designation with Stacey Fritz in the Fairbanks office. Stacey told us it is difficult to get a wilderness designation, but an ACEC is easier to get.
- At meetings like this, I like that I can find out about what protections are offered. I like that the BLM personnel had this dialog. I want to get the best protection I can.

### General

- Projects may go around us unless we say something. We will be affected one way or another by projects around us.
- Development projects threaten us. Money does not do us any good out here. If ruin the land, they ruin our life.
- Our lifestyle is important. All our food is off the land—organic and free range. We do not have to worry about pesticides.

## Unalakleet, March 26, 2015

### Attendance:

13 residents attended the Unalakleet community meeting to discuss preliminary alternatives for the Bering Sea-Western Interior Resource Management Plan. Bureau of Land Management (BLM) representatives provided a presentation and listened to community comments and discussion.

### Issues and concerns raised:

#### BLM Land

- A camp in the area has been abandoned and not been cleaned up.
- There is a desire for additional local ownership of land in the area. Summary of discussion:
  - Is there any way our corporation could get any land above Chirosky?
  - BLM: Land has already been selected. In this planning effort, we could identify land for exchange in the future. We usually don't identify much land for sale or exchange. We will exchange lands to resolve an issue, or for some other benefit to the government.
  - Some of us weren't given land because we were in the military. Then we got letters from BLM saying that we could get land, but then it didn't work when we tried to file for land. A bunch of people got land above Chirosky and we thought we could get land up there too.
  - BLM: I am not sure about that issue, but we would be happy to look into it.
- When the Air Force and the White Alice sites are completely cleaned, does that land go to the corporation? BLM: When those withdrawals have been lifted by Congress and it has been cleaned, and if it has been selected by the corporation, it can be conveyed by BLM. Both sites are still being cleaned.

- A concern was expressed regarding BLM's commitment to provide permit notification to affected communities, relative to commerce and development projects which may occur in the future.
- Do you go offshore too? Or just on the land? BLM: Just on the land.

### Iditarod Trail

- Discussion focused on potential for roads and utilities to cross the Iditarod National Historic Trail. Summary of discussion:
  - Your jurisdiction covers the historic Iditarod Trail? BLM: Yes.
  - We have a trail between here and Egavik and Chirosky, and all the way down to the river.
  - Is there any potential for roads to come through the trail, like between Unalakleet and the Yukon? Is there planning to use the easements? How does that work? BLM: The easements for the Unalakleet River and the Iditarod Trail were set up for those kinds of uses. The state has lots of stripes across BLM land, where they had recommendations for potential roads. We can consider utility corridors and roadways in this plan.
  - What about high tension lines and utilities? And can it be done today, like between here and Powers Creek, for example? BLM: Yes, but we do not really own that land.
  - Everyone nowadays follows the road behind the slough. The question is for several reasons. The current water/utility system is on the ocean side. If there were a way to use the utility corridor from Powers Creek to Unalakleet, it would potentially help the City of Unalakleet with their disaster plan. It would help to get the water line in above sea level. BLM: That particular land we do not manage. Let's look at a 17b easement map.
- We don't need any more markers saying this is a National Historic Trail!

### Subsistence

- Subsistence resources are vital to the community. Maintaining clean land, water, and air is critical to maintaining subsistence resources and healthy communities. Summary of discussion:
  - In living here all my life, I've seen a lot of changes. The State of Alaska abolished the Coastal Management Program a few years ago, which protected subsistence resources. The program was an attempt at keeping the air, water, and land clean. Whatever we harvest and eat, that goes into our body. It would be good if you could work that in under the subsistence category, because it is a historic subsistence economy.
  - I am indigenous to this land. I was here before it became a state. We cannot afford vehicles like a Ford, to have Ford tracking over our land. Neither is Chrysler or Diesel from here. We don't like to invite you. Stay in Nome, where the miners and gold diggers are. We live off the land, not in the land.
  - When we last met, we said it was very important to preserve our land and our Native culture. We are saying it again.
- There are 2 issues relative to operations of programs. We need to identify indigenous traditional use for subsistence to be mapped for each community, showing for historic and customary indigenous use. We need to keep this context for the next 20 years, the life of this plan.
- We need to have consultation as a policy for any programs that are enforced, consultation with the tribe and corporation to develop working relationships, to make sure the land is able to support the living creatures. *WE* are custodians of the land. Make sure we pass on this land to the next generation, it is what we have.
- Regarding caribou hunting north of Shaktoolik, do you have anything for predator control written into the plan? Can something be done? Like today, where there is a rapid decline in the caribou

population, can you do something with that? BLM: We normally work with ADFG. We manage the habitat, and they manage the wildlife populations.

- I am concerned about continued access to subsistence areas have been traditionally accessed. BLM: We are serious about honoring ANICLA and the current rules and rights. There are different rules for subsistence, mining, and recreation transportation. ANILCA requires reasonable access. Community response: Who can define reasonable? Are you hungry?

### Wildlife

- The caribou have not come this far south in quite some time. Take that into consideration in terms of St. Michael and Stebbins. BLM: We are not seeing winter range come as far south.
- People are considering herding reindeer for a meat supply.

### Rural Economies

- Is it possible to consider local organizations, in addition to Alaska Department of Fish and Game (ADFG) and the US Fish and Wildlife Service, for population inventory monitoring or fish monitoring? There are local organizations that do projects within our river already. Norton Sound Economic Development Corporation (NSEDC) is very active in monitoring fish populations. More and more, the state is pulling out of rivers because they do not have the money to monitor rivers. BLM should work with tribe or Native corporation. Within Norton Sound and the whole Seward Peninsula, NSEDC spends equivalent to the state on fisheries management.

### Forestry/Firewood permits

- Discussion regarding firewood permits was mixed, with some people in favor of the idea and others opposed. If permits were to be required, several residents advocated for local staffing, in cooperation with the tribe or corporation. Summary of discussion:
  - It would be good to have a firewood permit available. Maybe it would cut down on trespass on corporation and other lands.
  - There are several issues with free firewood permits, including accessibility to staff for those permits, unless you had someone here year round to issue those permits. If there are any consequences with NOT obtaining the permit? I would rather not see someone subject to a criminal action for heating their home. BLM: This process is definitely not fully developed. The goal of the permits is to gather use information.
  - How far do you want to go? It may not be cost effective to get firewood from BLM lands.
  - You can't cut trees on BLM land? BLM: You can. We are thinking about having free permits to collect information about how much wood is being harvested.
  - The nicer trees are way up there, ones that are good for homes. BLM: Commercial use requires a permit, if you are going to sell the wood.
  - You could hire local people to clean out easement corridors.
  - I am not in favor of a permit. It would create heartburn for people to get a permit for wood that we have been using all of our lives. BLM: There may be other ways that we can obtain that information.
  - You can work with the tribe to get information and to spread the word about harvest available on BLM lands. And we need to know where BLM is located. We don't want trespass on others' land.
  - The permits would be free? That would be easier. Can you pay someone to work part time in the corporation office to hand out the permits? BLM: Those are good ideas. The process would need to be simple and easy.

## Travel Management

- The travel management topic had extended discussion. The community expressed concern about increasing levels of resource damage from off-road vehicle use. Techniques for management were discussed, but a clear preference was not identified. Concerns were expressed regarding enforcement of policies and maintaining access to traditional use areas. Summary of discussion:
  - Protect the land from over-use from off-road vehicles. We are seeing more and more damage from that.
  - Who would do the monitoring for travel management? Just like the permits for tree cutting? BLM: We have a vacant law enforcement position now, and we hope to fill it soon.
  - People think the land belongs to them and they can go anywhere with whatever they have available to them. BLM: 50 years ago, people did not pick berries via all-terrain vehicles. How can we manage this without damaging the land? Legally we cannot restrict subsistence access. We want it to work so it is not damaging the resources you rely upon.
  - Some people use aircraft, boat, snowmachine, and many wheeled off-road things. Whatever technology is available, it will be used.
  - We do not want to damage the resources.
  - The weight and width rating is too much. BLM: I recommended a 2,000 pound gross vehicle weight (GVW) rating to acknowledge 3, 4, 6, and 8 wheel vehicles. We want to manage and allow common vehicles used for subsistence. We want to separate larger vehicles that are damaging wetlands and permafrost. The greatest impact on BLM lands is from unmanaged off-highway recreation. The future of this plan is 20 years.
  - If you allow amphibious types of vehicles, they can go on any waterway and then go to otherwise inaccessible areas. I would not allow those. BLM: Crossing salmon streams requires a permit. That is one way to manage it. We can close, harden, make seasonal use restrictions, or other types of use restrictions. I think GVW is the most consistent way to go. State of Alaska policies include a 1,500 pound curb weight, which is the same as 2,000 pound GVW.
  - Can they go anywhere, or is there an established route? BLM: For casual use, there is a wide variety of alternatives. One is to stay on existing roads and trails. We are working to define that. We are looking at weight limits, and existing roads and trails. Again, the greatest impacts we see are associated with unmanaged off-highway vehicle use.
  - What is the current policy versus the proposed policy? BLM: We have no policy whatsoever for off-highway vehicles right now in this planning area. Recent planning areas include Kobuk-Seward Peninsula, Ring of Fire and the Bay Plan. In two of those three plans we have considered the 2,000 pound GVW; the Bay Plan and KSP Plan.
  - What are your proposed consequences for people who violate this policy? For the most part, someone that could afford that type of vehicle would be bear guides. Will the regulations be written in to this? BLM: It is actually already part of the Code of Federal Regulations, and it is enforceable. However, we have nothing to enforce now, because we have no policy in place for this planning area. In the case of a commercial operator, the how a guide operates is considered when we issue a permit. If we issue a new permit, it is for 1 year, so we can determine if the stipulations are adequate. If all goes well, can consider a 10-year permit.
  - I would like to see heavy consequences for a commercial operator violating travel management rules. They have a greater responsibility to the resource and resource

management. BLM: With a permitted use, we have discretion for whether or not we issue the permit. If there is a violation, we can suspend or terminate the permit.

- Can you do that above Chirosky? BLM: Our jurisdiction is above 10 Mile Creek. Uplands are our responsibility.
- Could we change the wording on summer subsistence cross country travel, like for berry picking and moose hunting, to 4-wheelers, 6-wheelers, and 8-wheelers? Make it for all-terrain vehicles only.
- Some people will take 3 people on their 4-wheeler.
- (Referring to slide 31 in the presentation, regarding use of off-highway vehicles.) I am interested in the alternative regarding special areas within 100 feet of identified airstrips and boat landings. Are you looking at limiting certain areas, so there is not a big concentration in certain areas: BLM: Certain areas may need different restrictions. For example, the Iditarod trail may need different restrictions. The trail to Kaltag is about as wide as a dogsled team. Community response: I am a little concerned, since you don't have someone on the ground here. Our area is so big and the area is so different. There are different conditions, like no snow, or plenty of snow. Will you have active management of when we can use a snowmachine? BLM: Let's use the Iron Dog as an example. It's a 2,000 mile race. The conditions may be favorable in one area, but not in another. That is a management challenge we struggle with. Our proposal is for 10 inches of snow or ground frost to accommodate winter travel without damaging soils and vegetation.

### Special Recreation Permits

- Management of Special Recreation Permits for outfitter-guides was a concern for the community, particularly related to king salmon fishing season. A local presence was recommended for enforcement/compliance. Summary of discussion:
  - Who do you request to check permits during king salmon season? BLM: I'm one person. We also have another outdoor recreation planner doing compliance. We use all other staff: biologists, subsistence coordinators, etc. We get calls from other people bringing issues to our attention during and after hunting season. We try to work together.
  - Our biggest concern is during king fishing. When we see guided boats go way up the North River, that is of concern.
  - Can you restrict guided king salmon fishing? There is value in working with other agencies, including the state.
  - I have concerns not only with the Apples, but also with Vance and his crew. A lot of Vance's crew is not guided. They drive their own boats. That is where my concern lies. If you are guided and the owner of the company, you will tell them to be responsible to the one fish per year. On the unguided operation, they are from Switzerland or Germany, perhaps they do not care as much whether they catch 1 or 10. If they get caught, they are still at home overseas.
  - From my point of view, it would be more beneficial to have a local ranger that knows the land and the boundaries, rather than bringing in someone that has never been here. It would make us feel better to have someone. BLM: We have tried that in the past. Fred Ivanoff worked for us in the summer. We could not find 40 hours of work for him to do. Maybe a half-time employee would work better.
  - Unalakleet Native Corporation (UNC) or the tribe would like to enforce parts of the river, particularly close to the community. We would be willing to take on assistance during king salmon or silver salmon fishing. It could be done with a cooperative agreement.

BLM: We have plans to hire two more employees out of the Nome field office. Maybe they will be able to work more in this area.

- Is there some kind of etiquette that the river guides have to follow to be a river guide? BLM: They have to have an operation plan and a safety plan.
- The guided ones, the boats stay out of the way of our fishing. The unguided ones, they do not care. BLM: If there is something that needs to be investigated, please let us know. BLM will not share your names.
- UNC land is limited. Are there a limited number of guided sport hunting permits on the UNC land? BLM: The state manages guides on state lands, but you have private lands. Community response: It could be trespass then. Our corporation has a right to say whether the state can allow guided hunters on corporation lands. BLM: The state or BLM would not authorize guided activities on private lands, such as Native corporation lands or Native allotments.
- Doyon Corporation allows people on their lands, but with a price, for a permit under authorization via the corporation. BLM: 3 percent of gross commercial fees come back to the office to manage permits, for compliance.

### **Minerals – Locatable and Leasable**

- It is critical to have adequate notification to affected communities important regarding policies and steps, particularly related to proposed mining plans.
- If you find gold in our area, don't tell anyone.
- A lot of it is south, along the Kuskokwim belt.

### **Watersheds/Clean Water/Fisheries**

- For fisheries, protection of spawning grounds is important.
- I am worried about the baseline. What do you consider to be clean water, including mixing zones? Currently, clean water is coming down now. That should be the standard. But we do not know whether it is or not. Subsistence depends on clean water, clean air, and clean land. It needs to be evaluated and set at the standard. BLM: Much of the clean water regulation does not fall within our jurisdiction. We do care about it. The standards that are related to the Clean Water Act are the responsibility of the State of Alaska.
- I would like to see emphasis on the estuary in the watershed to make sure it is in good condition. It might need to be a cooperative effort. BLM: That is a good point. They may encompass Native corporation lands and Native allotments.
- For priority fish species, where does the Unalakleet River rank? Looking at the small population of the Unalakleet, it is very unique. We have like 8 or 9 species here. BLM: We appreciate that feedback. Matt Varner is the lead for fisheries in our State Office. Merlyn Schelske has worked on it too. We are incorporating their evaluations and information from the communities in the planning efforts.

### **Wild and Scenic River**

- Unalakleet is a high quality watershed. The Unalakleet River is already an important watershed, designated as a Wild River.
- Are there plans to make more Wild and Scenic Rivers? BLM: The Wild and Scenic Rivers Eligibility Report identifies 23 rivers as eligible. Then we will need to look at suitability in Resource Management Plan. We could recommend rivers in this plan, and then congress would have to designate them. I haven't seen anything likely to be identified as suitable at this time.

- What is the advantage of a Wild and Scenic River designation? BLM: Additional protection. There could be more labor and funds are dedicated to the area for management. The important features, like subsistence, cultural, and fish resources would be protected and enhanced now and into the future. We have a BLM Administrative site here, due to Unalakleet River.
- When do we have to make the recommendations? BLM: The comment period ends April 19.
- Does BLM designate the rivers? BLM: No, we make recommendations to Congress.
- Can we un-designate the Unalakleet River? BLM: Congress would have to take the designation away.

### **Areas of Critical Environmental Concern**

- An Area of Critical Environmental Concern (ACEC) was recommended by the community on the Unalakleet River. What are they for? BLM: Many are primarily for protection of salmon spawning areas. The Pew Institute has recommended a couple ACECs. Some are looking at the whole watershed, rather than a river corridor. We will likely look at common themes, and maybe will combine some together. We will make recommendations for ACECs in the draft plan.
- Is that funded by the Pew Project? BLM: They recommended ACECs in this planning effort.
- They did it because they are interested in conservation of this area? BLM: They are a conservation organization that has worked with other villages.
- That ACEC designation would do what? BLM: It would pick key resources for management. Most are focused on salmon spawning or rearing areas. The designation does not necessarily put restrictions or prohibitions on the area. If we do apply special management restrictions, it would be through a public process.
- Do you do consultation when you are deciding? BLM: Yes, it would be a more focused planning process, just for that ACEC, not such a big area like we are looking at now.