



Alaska Outdoor Council

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July 27, 2005

Mr. Bruce Rogers
East Alaska RMP Lead Planner
BLM, Glennallen Field Office
P.O. Box 147
Glennallen, Alaska 99588

RE: East Alaska Draft Resource Management Plan and Environmental Impact Statement. (EARMP/EIS)

Dear Mr. Rogers:

Thank you for providing an opportunity for the Alaska Outdoor Council (AOC) to submit public comments regarding the East Alaska RMP/EIS. The AOC represents over 10,000 Alaskans statewide. Thousands of AOC members fish, hunt, trap and recreate on the 7 million-plus acres within the EARMP planning area. Some AOC members have been accessing state and federal public lands within the EARMP for decades and they want to continue to do so.

Access restrictions resulting from the adoption of both Alternative C and D will not allow traditional means of access to continue on portions of public lands in the EARMP area and therefore are not supported by the AOC.

Review of the Evaluation and Findings section for Alternative C make unsubstantiated negative claims regarding the effects of motorized transportation on subsistence uses and needs, as required by The Alaska National Interest Lands Conservation Act (ANILCA) Section 810(a). Specifically, the following comment is not supported by the facts: "Travel and recreation management under the status quo would result in the continued unmanaged and unplanned proliferation of OHV use. Additional and poorly planned OHV trails would continue to compromise the effectiveness of habitat refugia for fish and wildlife by allowing easier and increased access to those areas." (Page 649) It is relevant and important to note that the Alaska Department of Fish & Game area biologists has no documentation that OHV trails have significantly restricted subsistence uses or needs.

The Implementations-Level Planning section for both Alternative C and D will require the significant expenditure of time and funds in the attempt to designate areas and trails as "limited" or "closed. In contrast, Alternative A, based on the Southcentral

Management Framework Plan (MFP), is the only alternative plan that would not require an inventory of all trails within the planning area.

For these reasons, plus the fact that after land conveyances the majority of the EARMP area will be under state management, AOC supports Alternative A with the following amendments:

1. Revising Alternative A to match the State of Alaska's "Generally Allowed Uses on State Land" policy. This policy has a long record of adequately protecting state lands and will allow consistent enforcement between state and federal lands.
2. Revoking all ANCSA d(1) withdrawals, except within the already designated Delta and Gulkana Wild and Scenic River corridors and PLO 5150 (page 107 Alternative B, withdrawals.) Dual management of subsistence hunts in GMU 13 has been a continuous issue since federal managers developed subsistence regulations of their own. Conservation goals and law enforcement of state hunting regulations would be much easier to achieve without federal hunting regulations applying to 1.5 million acres out of the 7 million in the planning area.
3. The construction of recreational facilities (under Alternative B, page 57) for the Denali Highway Area would be highly favored by the AOC. The AOC believes the vast majority of outdoor recreational users are law-biding citizens who are cognizant of environmental issues and they would appreciate outhouse facilities, garbage receptacles, and campground/boat-launches.

The AOC recommends that the lands within the EARMP area that are to be conveyed to the state and native landowners should be conveyed prior to adopting this plan. The planning process for lands that will change ownership in the near future is not a productive use of resources or time.

The AOC believes management of recreational opportunities and the conservation of natural resources values in the EARMP area can be achieved without unnecessarily restricting traditional activities and means of access that have been specifically provided for in ANILCA. Currently, State and Native lands within the EARMP are adequately being managed under a number of plans; the Copper Basin Area Mgmt. Plan (Dec. 1986), the Susitna Area Mgmt. Plan (June 1985), and the Nelchina Public Use Area. The AOC will not support any management alternative that is more restrictive than these plans or the state's "Generally Allowed Uses on State Land" policy.

We appreciate the opportunity to comment on the East Alaska Draft Resource Management Plan. AOC would welcome the participation of the Glennallen BLM Field Office in any planning process to update existing state management plans after land conveyance in the EARMP area have occurred.

Sincerely,

Rod Arno
Executive Director

Cc: The Honorable Ted Stevens, US Senator for Alaska

The Honorable Lisa Murkowski, US Senator for Alaska
The Honorable Don Young, US Representative for Alaska
The Honorable Frank Murkowski, Governor of Alaska

The official State Association of the NRA