



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

ANILCA Implementation Program

Office of Project Management and Permitting

550 West 7th Avenue, Suite 1430
Anchorage, AK 99501-3561
Main: 907.269-7529
Fax: 907-269-5673

May 2, 2019

Adam Carr, Field Manager
Bureau of Land Management
Eastern Interior Field Office
222 University Avenue
Fairbanks, AK 99709

Dear Mr. Carr:

The State of Alaska accepts your invitation to participate as a cooperating agency in the preparation of the travel and transportation management plan for the White Mountains National Recreation Area, the Steese National Conservation Area and other Bureau of Land Management (BLM) managed lands within the planning area identified on Map 0826, dated March 8, 2019. We also reviewed the materials made available at the public meetings for this inventory review phase of the planning process. The following comments represent the consolidated views of state agencies.

New maps were posted to the planning website yesterday, May 1, 2019. Given the late posting, our review did not include information provided on these new maps. It is also likely that public comments received by BLM to date would not have considered these new materials. Although the website indicates these maps were from the April 2019 public meetings, the maps we saw at the Anchorage public meeting were from the Eastern Interior Resource Management Plan (EIRMP) and did not include routes identified in the new maps. It appears the new maps may reflect the type of information the BLM contractors and resource specialists requested at the public meetings.

The State worked with BLM on the development of the EIRMP. Travel management was a significant issue for the State and others, especially with regard to implementation of the access provisions in the Alaska National Interest Lands Conservation Act (ANILCA), which have been summarized in Section 2.2.1 of each of the EIRMP subunits. Given that most of the travel management decisions were deferred to step-down plans, we look forward to working with BLM to ensure these provisions are appropriately recognized and implemented during this planning process. The BLM 2009 Alaska Travel Management Guide also includes guidance for implementing these and other applicable ANILCA provisions.

We request the plan provide for access along motorized routes that align with the State of Alaska Generally Allowed Uses (GAU's), as well as the conditions for GAU's found in 11 AAC 96.025. Use of this approach in previous BLM plans has been beneficial for maintaining connectivity across different land ownerships. Please note that entirely prohibiting off-trail use in any part of

the planning area is not consistent with these guidelines and would unnecessarily restrict game retrieval.

Aligning uses on BLM trails with the State's GAU's would provide needed consistency for hunters, anglers, and trappers recreating and gathering subsistence resources across public lands. Many areas of the plan are accessed by first crossing state lands. For example, Colorado Creek Cabin via the trailhead at the Tolovana Bridge or from the Elliott Highway (following the ridge between O'Brien Creek and Globe Creek), Moose Creek Cabin by the Trail Creek Trail from Haystack Subdivision at 11 Mile Elliott Highway, McKay Creek Trail, and Lee's Cabin by the Wickersham Creek Trail and Trail Creek Trail are all accessed through state/state selected lands.

Information resources developed by the Alaska Department of Fish and Game (ADF&G) may also prove useful in analyzing stream crossings, fish and wildlife habitat, distribution, and use within the planning area. Documents that may be of assistance include:

- Alaska's Wildlife and Habitat, ADF&G, Jan. 1973.
http://www.adfg.alaska.gov/static-sf/GIS/AHMGB/AHMG_Alaskas_Wildlife_And_Habitat.pdf
- Alaska Habitat Management Guide Series
<https://www.adfg.alaska.gov/index.cfm?adfg=maps.habitatmanagement>
- Anadromous Waters Catalog, (available on line)
<http://www.sf.adfg.state.ak.us/SARR/FishDistrib/anadcat.cfm>

These documents and other information on fish and wildlife habitat, distribution, and use for each Game Management Unit (GMU) within this planning area are available at the local ADF&G Fairbanks office. Trails crossing anadromous streams may require a fish habitat permit from ADF&G.

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

Sincerely,



Susan Magee
ANILCA Program Coordinator

cc: Eric Yeager, Outdoor Recreation Planner