



# BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



AK BHA

[www.alaskabackcountryhunters.org](http://www.alaskabackcountryhunters.org)

April 8, 2013

To: BLM Eastern Interior Field Office  
1150 University Avenue  
Fairbanks, AK 99709  
EasternInterior@blm.gov

Re: Eastern Interior Draft RMP/EIS

## **Comments on Eastern Interior Draft RMP/EIS**

We strongly **OPPOSE** the preferred BLM Alternative C in this RMP, as well as oppose Alternative D. Please consider these comments in conjunction with the extensive comments from the Black River Working Group, as we also have joined with them as a signatory to their comments.

Alaska Backcountry Hunters & Anglers (AK BHA) is a dedicated group of hunters and anglers committed to the long-term conservation and stewardship of our fish and wildlife habitat, and to ensuring future generations have the same hunting and fishing opportunities available to us now. We advocate for “using the Quads God gave you” to access areas and sustaining the wilderness characteristics of our lands and rivers. Many of our members, including our organization’s leaders, have been hunting and fishing, subsisting and recreating, within BLM eastern interior lands for decades.

We find the agency-preferred Alternative C to go against much of what our organization stands for, as well as go against what we believe BLM has stood for in the past in terms of providing adequate protections to the lands and waters it manages.

Alternative C is essentially a pro-development plan that would remove current conservation protections from vast areas of lands and waters in the eastern interior. Alternative C even goes against the very stated purpose and need for this plan, which speaks to the potential need of additional

protections for fish and wildlife populations and the habitat they depend upon, in order to comply with international treaties and sustain subsistence resources and subsistence opportunities.

At a time when our Chinook salmon stocks have rapidly declined, and many subsistence needs are thus not met, as well as the real potential to not meet escapement goals into Canada, removing current protections from vast areas such as the Upper Black River, Salmon Fork, and Kandik Rivers, to allow for new mineral entry and transportation routes and development, is the opposite of what BLM should be advocating for. The same can be said for allowing new dredging and gold mining on other rivers, as well as new development that would be allowed under Alternative C in other eastern interior regions.

### **We Support Alternative B**

We support Alternative B, and support expanding the Salmon Fork Area of Critical Environmental Concern (ACEC) as originally requested by the village of Chalkyitsik and also recommended by the Black River Working Group.

We urge BLM land managers to carefully weigh a decision on this RMP and choose the alternative (B) that will ensure we retain the wilderness characteristics of these eastern interior lands, protect vital fish and wildlife habitat and populations, and continue to provide the kind of primitive recreational and hunting and fishing opportunities that is sorely lacking in other areas.

Thank you for the opportunity to comment.

Sincerely,

Mark Richards

Co-chair AK BHA

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