



May 28, 2021

Marnie Graham, Field Manager  
Bureau of Land Management  
Glennallen Field Office  
P.O. Box 147  
Glennallen, AK 99588

Dear Ms. Graham:

The State of Alaska reviewed the Alphet Hills Prescribed Burn Environmental Assessment (EA), which evaluates the State's proposal to burn approximately 53,000 acres of land, in three distinct burn units, in the Alphet Hills area near the West Fork of the Gulkana River. The following comments represent the consolidated views of state resource agencies.

The proposed project is located within the East Alaska Resource Management Plan (EARMP) planning area and is consistent with the management direction in the RMP. Completing the Alphet Hills prescribed burn is the primary management action listed in the Fire and Fuels Management Section (Section E) of the 2007 EARMP. We are fully supportive of Alternative 2 as the proposed (preferred) action, providing the changes requested in the following comments are made to ensure Alternative 2 is consistent with the Alaska Department of Fish and Game's (ADF&G) Alphet Hills Fire Management Plan. The proposed project, which is most closely identified with Alternative 2 in the EA, is also consistent with the 2018 BLM Fire Management Plan, the 2021 Alaska Interagency Wildland Fire Management Plan, and the 2006 Gulkana National Wild and Scenic River Plan (i.e., step-down plan to the EARMP).

The State of Alaska owns and manages most of the lands proposed for the prescribed burn; the Bureau of Land Management (BLM) manages a total of 10,865 acres of land within the proposed prescribed burn area. Conducting prescribed burns in this area has been a management action conducted on both State and BLM lands in this area since the 1980s. Working together, burns were attempted in nearby areas in the 1980s and 1990s. These burns failed to meet their objectives because of very narrow burning windows. In 2003 and 2004, fires were successfully ignited, though only the 2004 fire met the burning objectives when 41,000 acres burned a mosaic pattern<sup>1</sup>.

The Alaska boreal forest is a fire dependent ecosystem requiring fire to maintain its viability. Resource managers, as well as fire managers, constantly weigh the long-term effects of fire suppression on ecosystem sustainability.<sup>2</sup> This project is necessary to improve wildlife habitat, especially for moose.

---

<sup>1</sup> Gulkana National Wild and Scenic River Management Plan, page 51

<sup>2</sup> Alaska Fire Service, BLM Alaska 2021,  
[https://akfireinfo.files.wordpress.com/2021/04/2021\\_afs\\_fact\\_sheet\\_final.pdf](https://akfireinfo.files.wordpress.com/2021/04/2021_afs_fact_sheet_final.pdf)

ADF&G studies over the last five years in game management units (GMU) 13A, B, and C indicate a nutritionally limited population in GMUs 13B and C, and a need to gather more information on browse removal and browse quality to better understand moose nutrition in GMU 13. These burn efforts are all key to the State's efforts to fulfill its wildlife management responsibilities, which include providing harvest opportunities.

The State values the 40-year cooperative working relationship that it has with the BLM and looks forward to working together in this upcoming field season on implementing the proposed project, as represented in Alternative 2, with the specific changes identified below.

### **Purpose and Need**

The EA's purpose and need statement is similar to the State's stated project purpose - to use wildland or prescribed fire [to] achieve desired conditions for moose habitat on their winter range. The EA further indicates that the proposed action aids BLM in meeting the Fire Management goals, objectives/desired conditions and management direction in the EARMP, which include meeting the moose habitat objective/desired conditions shown below, as well as management direction to utilize wildland or prescribed fire to achieve desired conditions for moose habitat on moose winter range, with the number one priority action being to complete the Alphabet Hills prescribed burn. However, the overall analysis in the EA fails to recognize that Alternatives 1 and 3 do not meet the intent of the EARMP to complete the Alphabet Hills prescribed burn.

E-1: Goals, bullet 2 "Use wildland fire and fuel treatments to meet land use and resource objectives." (EARMP, page 12)

Section E-3-a: Moose Habitat. Use wildland fire or prescribed burning to achieve the following desired condition: A mosaic pattern of upland spruce woodland cover types interspersed with a lower seral expression dominated by alder and willow. Upland woodland cover types are mixed with stream terraces and flood plains dominated by sedge and mixed age classes of alder and willow. (EARMP, page 14)

Section E-3-b 1. Utilize wildland or prescribed fire to achieve desired conditions for moose habitat on moose winter range... Priority for treatment will be as follows: a) Completion of Alphabet Hills prescribed burn; b) winter range on unencumbered BLM land... and 5. Prescribed burn plans will apply the following Require Operating Procedures, as applicable: ROP-Veg-a-4, ROP-Veg-a-2, ROP-Veg-a-1, and ROP-F&W-a-10. (EARMP, page 14)

Neither Alternative 1 (No Action), nor Proposed Alternative 3, which is referred to as the "Limited Burn" alternative in Chapter 3, will accomplish the project's stated purpose and need. Specifically, Alternative 1 would limit burning activities to state lands, which is not feasible since the Gulkana River is needed as a natural firebreak. Alternative 3 only proposes burning Unit A, or one of the three units in the prescribed burn plan. These alternatives are also not feasible because the likelihood of Units B and C burning are negligible, and Unit A is only 23,198 acres instead of the 53,590 acres proposed for the prescribed burn.

The EA also needs to ensure the description of habitat enhancement in the purpose and need statement is consistent with the following statement in the ADF&G Alphabet Hills Prescribed Fire Plan: "Enhance

forage quantity and quality for moose and increase habitat availability for species needing early to mid-successional forest stages.” This emphasizes that the project is specifically designed to improve moose habitat in accord with the EARMP.

### Standard Operating Procedures

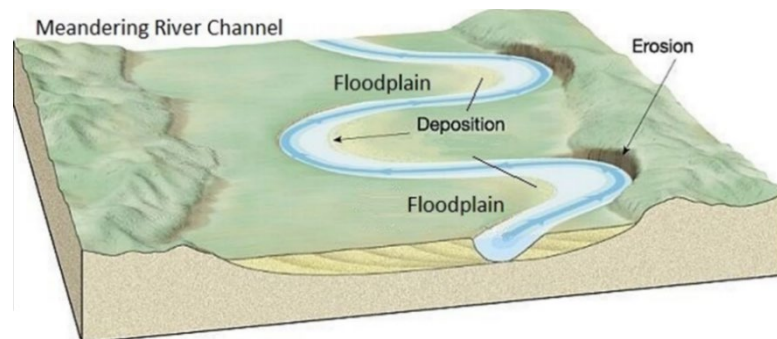
Alternative 2 in the EA fails to identify that many of the standard operating procedures (SOPs) proposed by the State (see excerpt below from the 2021 ADF&G Draft Alphabet Hills Prescribed Fire Plan) and included in the EA, are mitigating actions required by the Gulkana National Wild and Scenic River Plan (Gulkana NWSRP) for prescribed burns.

The Gulkana NWSRP provides that fires may not be ignited (fired) within the Gulkana Rivers active flood plain and requires maintaining a vegetated buffer along the river and specifies that it shall be accomplished by not lighting directly along the river and by allowing for a mosaic pattern of burned/unburned vegetation. According to the Gulkana NWSRP, these SOPs will protect water quality. The plan further states that any water quality impacts from prescribed burns will be short term in duration. (Gulkana NWSRP, Item 10: Fire Management, page 51)

Consistent with the Gulkana NWSRP, the proposed project includes using alluvial context referencing topographic features (and providing a diagram that can be used by the Firing Boss) as seen from the helicopter during the firing operation.

#### Element 15: Ignition Plan, C. Constraints:

Unit boundaries adjacent to the Gulkana Wild and Scenic River Corridor must be fired outside of the river’s active floodplain. See Figure X. below. Where geologic features are discerned from the air, use the river’s bluffs as this boundary. Alluvial terraces can be discerned along some stretches of the river; these will also suffice as boundaries. While firing cannot be done within the river’s meandering channel, fire is allowed to back burn into it. Applying this constraint protects visual resources consistent with a Visual Resource Management Class I. It also protects water quality by providing a vegetation buffer along the river while allowing for a mosaic pattern of burned and unburned vegetation along the river corridor to meet burn objectives for increased moose browse availability. Further, limited fire in this corridor mitigates damage to eagle nest trees thereby increasing survival of eagle young prior to fledging. (2021 ADF&G Draft Alphabet Hills Prescribed Fire Plan, pages 30-31)



*The active floodplain, alluvial terraces, meandering river channel need definitions. Cite from [https://www.geocaching.com/geocache/GC6F2ZA\\_golfing-along-the-grand?guid=cadc55b-ca08-4b78-a646-2f0e0a119f99](https://www.geocaching.com/geocache/GC6F2ZA_golfing-along-the-grand?guid=cadc55b-ca08-4b78-a646-2f0e0a119f99) accessed 5/10/2021.*

### **OHV/ATV Trail Proliferation**

The EA inappropriately hypothesizes the proposed burn will cause an increase in ATV and OHV use in the proposed project area. The EA states this will occur because the project will increase moose habitat, thus increasing the moose population, as well as the number of hunters pursuing moose.

It is reasonable to forecast that if this prescribed burn is successful and moose populations increase in the area, then increased and uncontrolled ATV/UTV use may occur within the WSR corridor. (Page 15)

It is also reasonable to predict that if prescribed fire increases moose density in the area and uncontrolled UTV/ATV proliferation continues to expand, then the water quality ORV associated with the Gulkana WSR would be degraded continually and long into the future. (Page 15)

We disagree with these statements as these impacts are already occurring in the area. Trail expansion has occurred despite the current low moose densities and will continue to occur regardless of whether the moose densities increase from the prescribed fire. The number of hunt permits or hunters in the area is not determined by moose populations as moose hunting in the area is primarily conducted by resident hunters with general harvest tickets, general subsistence registration permits, or federal registration permits, that are not limited, unlike drawing hunt permits, which are based on populations and issued to a specific hunter.

The EA also indicates BLM expects increased trail proliferation 1) because “the burning of trees and vegetation in the area will make portions of the project area more suitable to cross country travel,” and 2) because of “possible increases in caribou and moose populations.” (Alphabet Hills EA, Page 21) These assumptions are not logical because after a fire deadfall is very difficult to travel through by foot and ATV, while prior to a wildfire or prescribed burn, new foot or OHV/UTV trails can often be established easily by threading a route between standing trees.

Trail proliferation is not dependent on wildlife populations and has occurred in the area while wildlife populations have been decreasing. This is a management/enforcement issue, unrelated to the proposed prescribed burn. To address the so-called “uncontrolled” OHV use, BLM could increase its management presence in the area or reinforce trails to protect resources. We request these unfounded assumptions regarding OHV trail expansion be removed.

### **Migratory Bird Treaty Act (MBTA)**

The EA includes a mitigation measure that will restrict burning activities between April 15 to July 15. In doing so, the EA effectively limits the open window for conducting the burn to roughly two weeks as the weather in August and September is generally not conducive to conducting a burn.

This project’s goal is to simulate a natural ecological process, with the intent of improving habitat quality and wildlife in the area by reverting it back to an earlier successional stage. The EA incorrectly states that the proposed timing window, restricting burning between April 15 to July 15, is in accordance with the MBTA. The MBTA and its implementing regulations at 50 CFR 10.14 do not specify timing windows, though we suspect the timing window is based on USFWS guidance designed to minimize incidental take of migratory birds from ground disturbing construction activities in Alaska (Timing

Recommendations for Land Disturbance & Vegetation Clearing: Planning ahead to Protect Nesting Birds, 2017). However, this project is notably different from construction activities, in that it will improve, as opposed to degrade, habitat and species diversity in a fire-driven ecosystem. In addition, most birds will leave their habitat while it is burning yet will return within hours or days of the burn.<sup>3</sup> Effects to migratory birds in the project area will be further reduced as re-vegetation occurs in the proposed project area, resulting in a mosaic pattern of burned and unburned vegetations due to the numerous lakes, streams, ponds, and wetlands throughout the project area.

These timing recommendations are guidelines only and current MBTA regulations (50 CFR 10.14) on incidental take limits a “take” to a direct, intentional action, the purpose of which is to kill or capture migratory birds, their eggs, or their nests. The proposed project does not propose any intentional take and, as documented in the EA, the proposed project has been designed to minimize effects to migratory birds to the greatest extent possible (see Section 3.7.3). In consideration of the mitigation practices already incorporated into the proposed project to protect migratory birds, the lack of endangered species or anticipated population effect to any species of migratory birds, as well as the overall positive benefits the project will have to migratory bird habitat in the project area, we request that BLM remove the timing restriction.

### Page Specific Comments

**Page 1 (1.1 Summary of Proposed Project):** Contemporary prescribed fire language favors the term Project Area (PA) over Maximum Allowable Perimeter (MAP). The EA uses both terms but does not indicate their synonymous context. There are duplicate descriptions of the Project Area because both terms are used. We request an errata sheet note the replacement of the term MAP with the term PA throughout the document.

**Page 2 (1.1 Summary of Proposed Project):** The EA inaccurately identifies a fire line along unit perimeters as mitigating fire holding problems, which is not a feature of the proposed project. While there is no fire line, the preliminary risk assessment remains medium, as this remote setting uses natural features (water bodies, topography, and vegetation) to limit fire spread. We request an errata sheet clarify the remote setting uses natural features (water bodies, topography, and vegetation) to limit fire spread and mitigate fire holding problems instead of a fire line.

**Page 24 (3.4.1 Affected Environment):** The EA incorrectly indicates the Nelchina Caribou Herd (NCH) is always the most abundant large mammal in the interior. The EA states, “Caribou from GMU13’s [*sic*] Nelchina Caribou Herd (NCH) are common throughout the proposed burn area and are the most abundant large mammal in the interior region of southcentral Alaska.” This may be true in some years, depending on the volume of animals moving through GMU 13 but that number varies over time; therefore, this statement may not always be true every year, nor does it apply in the winter. We request the following revision be noted in an errata sheet:

Caribou from GMU 13’s Nelchina Caribou Herd (NCH) are common throughout the proposed burn area and are often the most abundant large mammal in the interior region of southcentral Alaska.

---

<sup>3</sup> <https://www.fws.gov/invasives/staffTrainingModule/methods/burning/impacts.html>

**Page 31 (3.4.6 Recommended Mitigation):** The likelihood that firing operations will affect caribou is minimal. The EA recommends suspending fire operations when 30 or more caribou enter the burn area or within a radius of 330 feet of firing operations during subsistence hunting seasons to minimize impacts to subsistence use of wildlife. The EA also states on page 27 that "...the breadth of the NCH [Nelchina Caribou Herd's] migration range would allow the herd to easily avoid the burned area without expending a notable amount of extra energy."

The burn units are remote with the edge of the burn units more than 24 miles to the nearest roads where subsistence hunting occurs. Hunters generally advance from the Denali Highway and the Richardson Highway if they are monitoring the migration of caribou for harvest. Fire in the Alphabet Hills is unlikely to affect caribou movement near the Denali and Richardson due to the distance from the highways. We request the following mitigation strategy be removed.

Subsistence hunting season for caribou on Federal public lands runs from August 1 to September 30 and October 21 to March 31. Many subsistence hunters rely on the caribou migration and caribou may migrate through this area during these times. The permittee is to maintain vigilance for the presence of caribou during the subsistence hunting seasons listed in this paragraph. If groups of 30 or more caribou enter the burn area or within a radius of 330 feet of firing operations during the subsistence hunting seasons listed in this paragraph, firing is to be stopped until the caribou have passed through the burn units. (Bullet #6)

**Page 50 (3.7.6 Recommended Mitigation):** The first mitigation bullet inappropriately identifies required operating procedures (ROP)-F&W-a-13 as mitigation for prescribed burns.

Consistent with the Migratory Bird Treaty Act, operations that require vegetation removal will avoid the migratory bird nesting period of April 15 to July 15. (ROP-F&W-a-13; EARMP)

ROP-F&W-a-13 mitigation measure is not related to prescribed burns and should be replaced with the appropriate ROP-F&W-a-10 which states:

Prescribed burn ignition patterns will allow for stream buffers. Lighting at stream's edge will be avoided. (ROP-F&W-a-10)

This is consistent with the EARMP Management Actions (Prescribed Fire) which states:

**Prescribed burn plans will apply** [emphasis added] the following Required Operating Procedures, as applicable: ROP-Veg-a-4, ROP-Veg-a-2, ROP-Veg-a-1, and **ROP-F&W-a-10**. [emphasis added] (p. 15, 2007 EARMP)

Also noteworthy is that ROP-F&W-a-10 begins with a capitol letter and ends with a period, whereas ROP-F&W-a-13 instead begins with a comma indicating it does not stand on its own and needs to be considered in the context of the preceding ROP-F&W-a-12 regarding recreational development which states:

Recreational developments, permits, or leases on lakes or lakeshores with historically active trumpeter swan nest sites or staging areas will only be allowed (ROP-F&W-a-12)

ROP-F&W-a-12 does not end in a period and must be read with ROP-F&W-a-13 which starts with a comma stating:

, operations that require vegetation removal will avoid the migratory bird nesting period of April 15 to July 15; If no feasible alternatives exist, an assessment will be conducted to determine bird species present, significance of potential impacts, and possible mitigation measures. (p. 8, 2007 EARMP Appendix C)

Thusly, reading ROP F&W-a-12 and a-13 together indicates the full meaning of the required operating procedures, as follows:

Recreational developments, permits, or leases on lakes or lakeshores with historically active trumpeter swan nest sites or staging areas will only be allowed, operations that require vegetation removal will avoid the migratory bird nesting period of April 15 to July 15; If no feasible alternatives exist, an assessment will be conducted to determine bird species present, significance of potential impacts, and possible mitigation measures. (p. 8, 2007 EARMP Appendix C)

When ROP F&W-a-12 and a-13 are viewed in context holistically it is clear they only apply to recreational developments, permits, or leases on lakes or lakeshores. The EA fails to consider ROP F&W-a-12 and a-13 together and therefore incorrectly applies ROP F&W a-13 as prescribed fire mitigation instead of ROP F&W-a-10. ROP F&W-a-10 is identified as a prescribed fire mitigation in the 2007 EARMP and should be included as mitigation in this EA instead of ROP-a-13.

#### Burn Dates

As discussed above, ROP-F&W-a-13 provides an untenable timeframe for the proposed project. The timing for a prescribed burn is a function of the weather and fuel moisture conditions in the burn units. The proposed project identifies the appropriate burn window to be from June 15 to September 30, which is based on historical records of temperature, relative humidity, wind, and precipitation. It is rare that these conditions all occur in alignment with other decision points for igniting a prescribed fire. As a result, further restrictions on the burn window will likely result in a failure to implement the operation. While the Alphabet Hills prescribed burn plan was first developed in 1981, it appears the ignitions attempted in the first two decades of the program had little to no success. It was not until State and federal staff collaboratively rewrote the burn plan to allow for the current wider prescription window that ignition was finally successful in 2004. We reiterate our request for ROP-F&W-a-10 to replace ROP-F&W-a-13 as mitigation:

- ~~Consistent with the Migratory Bird Treaty Act, operations that require vegetation removal will avoid the migratory bird nesting period of April 15 to July 15. (ROP-F&W-a-13; EARMP)~~
- Consistent with the Migratory Bird Treaty Act, prescribed burn ignition patterns will allow for stream buffers. Lighting at stream's edge will be avoided. (ROP-F&W-a-10)

**Page 50 (Wildlife, 3.7.6 Recommended Mitigation):** The bald and golden eagle mitigation measures in the EA are unnecessary. ADF&G is currently working with the FWS to secure an eagle and eagle nest take permit. Surveys have been completed for bald and golden eagles; the draft take permit application to the FWS is in place for conducting the prescribed fire during the burn window of June 15 to

September 30 and the final permit will be secured prior to commencing the project. We request the following mitigation measures be removed:

- Within one-fourth mile of bald eagle nests, the following uses will not be permitted from April 1 to August 31: a) surface disturbing activities; or b) FLPMA leases or permits. (ROP-F&W-b-4; EARMP)
- Consistent with the Bald and Golden Eagle Protection Act and U.S. Fish and Wildlife Service recommendation, surface disturbing activities will not be permitted within one half mile of golden eagle nests from March 1 to August 31.
- Consistent with the Bald and Golden Eagle Protection Act, bald and golden eagle nests and nest trees will be protected from burns, damage, or other disturbance that could dissuade eagles from returning to the nest.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 or by email at [susan.magee@alaska.gov](mailto:susan.magee@alaska.gov) if you have any questions.

Sincerely,



Susan Magee  
ANILCA Program Coordinator

cc: Tim Skiba, BLM Forester