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Bureau of Land Management  
Glennallen Field Office  
PO Box 147  
Glennallen, AK 99588  
Attn: Bruce Rogers  
Inre: East Alaska RMP – TLAD Implementation Plan  
December 16, 2006

Dear Mr. Rogers and staff,

Thank you for the opportunity to comment on the Tangle Lakes Archeological District (TLAD) proposed implementation plan.

Alaska Backcountry Hunters and Anglers (ABHA) is a dedicated group of hunters and anglers committed to the long-term conservation of wild places for wild animals and fish that we all cherish and depend upon, and to ensuring future generations have the same opportunities for backcountry hunting and fishing that we have now.

ABHA supports the proposed 2006 implementation plan and actions for the Tangle Lakes Archeological District (TLAD), and the efforts put forth by BLM staff to gather the opinions of various user groups and incorporate those opinions into a comprehensive plan that tries to be fair to all.

We would like to comment specifically on some areas of the implementation plan:

➤ Loops

We support the extension of certain trails, such as connecting the Osar Lake and South Landmark Gap trails, and the spur trails that can be done without impacting cultural or natural resources. And we also support maintenance of trails to reduce resource impacts. There are some fears

that installing Geoblocks and improving trails will lead to more motorized use in the TLAD, and that BLM shouldn't make the trails "too good." We recognize the catch-22 here, but it is important that the trails be maintained and even improved in places so that resource damage does not occur, especially in the wetter areas.

➤ Signage

While many users do not want to see signs or markers along trails, we believe that signs are a necessary visual tool to educate users about trail designations and restrictions, and to prevent abuse and non-compliance. Signage and markers are another form of education and help to curb abuse.

➤ Education

The most important role BLM can play in managing the TLAD is to provide education to all user groups and visitors as to the importance and significance of the region and why trail designations and restrictions are in place. Signs and pamphlets should be in place at trailheads and in campgrounds that explain the trail rules and etiquette, why those rules are in place, and why motorized users should obey the trail designations and restrictions for the benefit of all. Trail maps should also be included that outline the mileage of each trail and the seasonal restrictions and weight limits. Text should also include the wildlife safeguard phone number to call in any illegal hunting activity, and visitors should also be given information on how to contact BLM enforcement personnel and encouraged to report any violations.

Furthermore, we would also like to see increased education efforts by rangers and staff that teach visitors about the archeological significance of the area, and why visitors should not remove any archeological finds. The field of archeology has dramatically changed in recent times with the advent of precise gps technology and digital cameras. Archeologists, for the most part, no longer remove finds from the field. Instead, they document the location of any finds and photograph them and return them to where they were found. BLM staff should educate visitors about such things in order to help promote the history of, and respect for, past cultures and to show why the public should not remove any finds.

➤ Trailhead Facilities

Outhouses and bear-proof trash receptacles should be placed at trailheads and regularly maintained, and rules should be posted that inform visitors of proper toilet etiquette and procedures in the field, and reinforce that all trash must be brought out from the field. Trailhead facilities should be confined to trailheads only, and visitors made aware there will be no facilities in the field. Adequate parking areas should be established, but camping should not be allowed in parking areas.

➤ Enforcement

During high visitor use periods, such as the 4<sup>th</sup> of July holiday and hunting seasons, more enforcement personnel should be in the campgrounds and in the field. It has been stated in the Implementation Plan that “contacts will focus on education rather than enforcement,” and while we support that practice initially, we believe that at some point—after widespread education efforts have been in place, to include trail markers and signage and posting of rules and regulations—a zero-tolerance policy should be adopted concerning violations. The motorized user groups are a fairly tight-knit community. If it is known that there will be no tolerance for abuse/violations, this will help in the long run to curb any abuse. ATV and ORV clubs should be encouraged to “police their own ranks” as well, and be made aware that it is the small percentage of “bad guys” that eventually will be the cause for any further restrictions.

➤ Standards and Monitoring

Monitoring of trails and user impacts is of paramount importance. We suggest that aerial photo surveys be flown annually, or every other year, and a baseline of existing trails be established and documented so that any pioneering of new (illegal) trails is evident. A “bird’s-eye” view can often more adequately show what on-the-ground monitoring cannot. We support the use of “photo points,” as suggested in the Implementation Plan, to record and document soil disturbance and vegetation rehabilitation, and to determine what techniques and trail maintenance work in various areas.

User counters should be placed in locations to give the most accurate readings of visitor numbers so that any trends or increased visitor numbers can be evaluated.

➤ Non-motorized trails

We support the expansion and improvement of the non-motorized trail from the Tangle Lakes Campground to Landmark Gap Creek.

➤ Traditional Subsistence Activities

Traditional subsistence activities such as berry picking and hunting and fishing should be recognized as important and valid uses within TLAD. The impacts on wildlife by motorized use in summer and winter should be evaluated, as well as any possible impacts snowmachine use has on berry patches that have been utilized for hundreds of years by subsistence peoples. A balance must be maintained that allows subsistence activities by various user groups to take place while also protecting the fish and wildlife and plant resources of the TLAD for future generations.

Thank you again for the opportunity to comment on the TLAD Implementation Plan.

Sincerely,

Mark Richards

Co-chair Alaska Backcountry Hunters and Anglers

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