

# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME

### BOARD of GAME

SARAH PALIN,  
GOVERNOR

P.O. BOX 115526  
JUNEAU, AK 99811-5526  
PHONE: (907) 465-4110  
FAX: (907) 465-6094

March 26, 2008

The Honorable Sarah Palin  
Governor for the State of Alaska  
3rd Floor, State Capitol  
Juneau, AK 99801

Dear Governor Palin:

At our spring Board of Game meeting in Fairbanks, we considered a proposal from the public to create a wildlife refuge to protect the Tangle Lakes area from possible mining activity and the habitat destruction that might result. We heard compelling testimony from the public and the Alaska Department of Fish and Game (ADF&G) about the area's significant value to wildlife. We were impressed by the extent of public support for protecting the Tangle Lakes area in the long term primarily as wildlife habitat and as an important source of long-term opportunities for hunting, fishing, and recreation.

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The Alaska Board of Game shares the public's concern for the future of wildlife habitat in the Tangle Lakes area, but we recognize the limitations on the Alaska Board of Game regarding proactive measures to protect and enhance wildlife habitat. In the absence of a clear and present danger to wildlife, we haven't the authority to act preemptively to create a habitat reserve or a wildlife refuge.

While our legal charter does not allow us to create a wildlife refuge as the proposal requested, we can work proactively with ADF&G and land management agencies, notably the Alaska Department of Natural Resources (DNR). We seek your support for immediate discussions between these and any other appropriate state agencies to thoroughly catalog wildlife-related values, identify important habitat, affirm the extent of hunting, fishing, and recreation activities, document potential threats to those values and activities, and discuss possible courses of action designed to protect wildlife resources and uses in the area. We recognize the potential for mineral extraction in this area and in associated mineral leases, but remain convinced the long-term value of maintaining wildlife habitat far outweighs the potential benefits of possible development projects known at this time.

Thank you for your consideration.

Sincerely,



Cliff Judkins, Chairman  
Alaska Board of Game

cc: Commissioner Denby Lloyd, Department of Fish and Game  
Commissioner Tom Irwin, Department of Natural Resources  
Representative John Harris, Speaker of the House of Representatives  
Representative John Coghill  
Representative Woodie Salmon  
Representative David Guttenberg  
Senator Lyda Green, Senate President  
Senator Gene Therriault  
Senator Albert Kookesh  
Representative Craig Johnson, Co-Chair, House Resources Committee  
Representative Carl Gatto, Co-Chair, House Resources Committee  
Senator Huggins, Chairman, Senate Resources Committee

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# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME DIVISION OF WILDLIFE CONSERVATION

FRANK H. MURKOWSKI,  
GOVERNOR

333 Raspberry Road  
Anchorage, AK 99518-1500  
PHONE: (807) 267-2182  
FAX: (807) 267-2433

### MEMORANDUM

TO: Copper Country Alliance  
FROM: Robert Tobey  
DATE: 19 December 2002  
SUBJECT: Wildlife Resources in the Denali Block

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Thank you for the opportunity to present Wildlife Conservation's perspective on the resource value of the Denali Block. The Denali Block is important both as wildlife habitat utilized by a variety of species and public use land. This area falls within Game Management Unit (GMU) 13 with wildlife management responsibility that of the Glennallen office. The area also has dual federal management on federal lands for subsistence hunting. Land management authority is under the Department of Natural Resources. Land management guidelines were established with public input in the Copper River Basin and Delta Management plans. Both plans call for primary use of the land in question as wildlife habitat and public recreation with only incidental mining activity.

The range around Tangle Lakes is particularly critical to caribou. The Nelchina Caribou Herd is the largest, most important road-accessible caribou herd in Southcentral Alaska, and many caribou from the herd utilize the Denali Block. As many as 5000 caribou have wintered around the Tangle Lakes in recent years. Caribou behavior usually results in caribou selecting different winter ranges every year to take advantage of forage availability on ungrazed range. The fact that caribou have wintered in the Tangle Lakes area on an almost every other year basis shows this range is important. The area is also an important fall staging and rutting area used by up to 20,000 caribou in recent years. The loss of the Denali Block could have a substantial negative impact on the Nelchina Caribou Herd.

The Tangle Lakes is also one of the most heavily hunted areas in GMU 13. Because of the proximity to the Denali Highway and mild terrain, access to caribou in the fall and winter is good, drawing thousands of hunters every year.

The Denali Block also contains good moose habitat. Unlike the majority of GMU 13 where moose numbers are low, moose density in this area is high, making it an important moose hunting area. The Block is especially important to resident subsistence hunters trying to optimize opportunity by subsistence hunting for both moose and caribou at the same time.

The Denali Block also provides the most important small game hunting area in GMU 13. The Tangle Lakes region has been written up in a number of national sporting magazines, and even the subject of a television show, as a major Alaskan ptarmigan hunting destination. I have personally interviewed

numerous small game hunters traveling to the Denali Block just to hunt ptarmigan. This area has been promoted widely to non-resident bird hunters as well as residents because it offers exceptional hunting access.

The other important big game animal in the area is the grizzly bear. Because of the good fall berry crop in the area, and the importance of this dietary component, the Denali Block is important fall grizzly habitat.

Additional species in the area of importance are the wolf and fox. This is some of the best wolf and fox habitat because of the large prey base available to support these carnivores. Extensive hunting and trapping of these furbearers occurs in this area. Trapping is an important yearly source of income for many local residents, and sport hunters converge on the area to try for wolves.

Waterfowl use of the Tangle Lakes is also heavy. The lake system provides a staging area for migrating trumpeter swans, ducks, loons and other water birds. Nesting habitat for waterfowl is abundant and the area is an important waterfowl breeding area. Local waterfowl hunters are drawn to the Tangle Lakes seeking widgeon, mallards, and the less common long-tailed ducks. Since waterfowl are federally managed, I don't have specific survey numbers. Fish & Wildlife Service does swan surveys in the Copper River Basin, and perhaps they could provide some population estimates.

Finally, non-consumptive recreation is also extremely important in the Denali Block for Alaska residents and tourists alike. The upland habitat types and abundance of wildlife has made this area the number one recommended viewing area for those wanting to see both moose and caribou. The Glennallen Fish & Game office recommends this destination for those seeking a high quality wildlife viewing trip. During the winter season, many snowmachiners from across the state are also drawn to the Tangle Lakes area for recreational activities in addition to ptarmigan, caribou and moose hunting. The loss of this habitat as a wildlife viewing and recreational destination could greatly compromise the aesthetics of the Copper River Basin.

It is my position that the importance of the Denali Block as wildlife habitat, tourist destination, sport fishing, subsistence and sport hunting, subsistence food gathering and trapping area exceeds all mining value. All these uses except mining have minimal impact on the land and are renewable yearly. Certainly an impact study and cost benefit analyses are warranted in view of the high value of current uses compared to an unknown mining value.

Sincerely,



Robert Tobey



February 16, 2007

ATTN: BOG COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

RECEIVED

FEB 16 2007

BOARDS

RE: Comment on Proposal 204, March 2007 BOG Meeting, Anchorage

Proposal 204 asks the Board of Game to use its authority to ask the legislature to establish a state wildlife refuge in Unit 13 between the general vicinity of Paxson to the Maclaren River and north of the Denali Highway. The exact boundaries of the proposed refuge are outlined in the proposal and the objective is to protect an area with high wildlife values from development and surface mining.

In the mid-1970s, I spent three summers studying nesting behavior of gyrfalcons in the much of the area defined by this proposal and I know there are excellent wildlife resources, especially for birds, as described in the proposal. Cliff-nesting raptors (including golden eagle and gyrfalcons), tree-nesting or ground nesting species (bald eagle and merlin) are numerous and widely distributed in the area. Game birds and waterfowl are abundant especially in the Tangle Lakes, Glacier Lake, and Landmark Gap Lake areas. And, there are exceptional populations of other bird species including a large colony of long-tailed jaegers nesting in the flatland between the Denali Highway and Landmark Gap, and high numbers of arctic warblers along the Denali Highway.

After learning first hand about the outstanding wildlife resources in the area, I returned periodically for the next 15-20 years to pick berries, hunt ptarmigan, caribou, moose, and fish and canoe in the Tangle Lakes area. Others do the same, and this area is a great place for people, residents or nonresidents, to have exceptional wildlife and recreational experiences.

I am also aware of several archeological sites within the proposed refuge. One was named for stone points that I reported in 1975. They should be protected.

Even 30 years ago, I could see the value of protecting the wildlife values in this area because of its high use for recreation, hunting, fishing and wildlife observation. I support the proposal and encourage the Board to take a proactive step to protect wildlife resources now and into the future. I dream of returning and it is my hope I do not have to look a surface mining developments that rob the area of its unique scenic and wildlife resources.

Please act and pass Proposal 204. Thank you for your consideration.

Peter Bente  
PO Box 1611,  
Nome, Alaska 99762

Peter Bente  
02-16-2007  
Nome, Alaska

COMMENT# 219



# **BACKCOUNTRY HUNTERS AND ANGLERS**

**ALASKA CHAPTER**

**PO Box 47 Homer, AK 99603**



To: Governor Sarah Palin  
State of Alaska  
3rd Floor, State Capitol  
Juneau, AK 99801

July 10, 2008

Cc: DNR Commisioner Tom Irwin  
ADF&G Commisioner Denby Lloyd

Re: Tangle Lakes Refuge Proposal

Dear Governor Palin,

Alaska Backcountry Hunters and Anglers (AK BHA) is a grassroots organization of Alaskans dedicated to working for the protection of fish and wildlife resources for present and future generations. We are residents of the state who hunt, fish, trap, and depend on the living, renewable resources of this great state to sustain us. We believe the future of our hunting and fishing heritage depends on prudent management of intact ecosystems, and habitat protection.

You have heard from the Board of Game, former and current ADF&G biologists, citizens groups such as the Copper County Alliance, and other individuals about the pressing need to protect the Tangle Lakes area. This region has been recognized for years as vital hunting grounds for area residents pursuing Nelchina caribou, and is known to support important, if not critical, caribou winter habitat. Many resident moose hunters, and both resident and nonresident bear and small game hunters also utilize this region. This is a unique area of the state that we believe has its highest value in the renewable fish and wildlife resources, rather than the recoverable minerals. The hunting and fishing residents we represent, and our children and their children, deserve to have this area protected from the long-term damage large scale industrial mining inevitably causes. Because the recreational and subsistence value of this area is so important to current and future Alaskans, we support creating a Refuge in the "Denali block" area of the Tangle Lakes.

Prioritizing the protection of fish and wildlife here makes sense to a diverse group of Alaskan outdoors enthusiasts, from hunters and anglers and trappers, to wildlife viewers, hikers, and snowmachiners.

We respectfully request your support for the protection of this area for subsistence and recreational use by the people, via Refuge status.

Thank you for your time and effort.  
Sincerely,  
Louise Seguela – Secretary AK BHA  
<http://www.alaskabackcountryhunters.org>



# BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



3/15/10

To: Alaska Department of Natural Resources  
Division of Mining, Land, and Water  
3700 Airport Road  
Fairbanks, AK 99709-4699

Attn: Jack Kerin: "<mailto:jack.kerin@alaska.gov>" [jack.kerin@alaska.gov](mailto:jack.kerin@alaska.gov)  
Brent Martellaro: "<mailto:brent.martellaro@alaska.gov>" [brent.martellaro@alaska.gov](mailto:brent.martellaro@alaska.gov)

Re: APMA F109742—Pure Nickel 2010-2015 Exploration Permit Application

Thank you for this opportunity to comment on Pure Nickel's 2010-2015 exploration permit. We understand and appreciate the need to permit hard rock mining exploration in areas likely to hold good mineral resources. However, the area being proposed for large scale hard rock mining is in this case, critically important to the Nelchina caribou herd, one of the most accessible, extensively studied and heavily utilized caribou herds in Alaska. The Nelchina herd has provided food for Alaskans since time immemorial, and is managed to provide thousands of families with food to this day. We believe this property of the land, it's ability to provide a basic need for so many, is more important than the mineral resources that may be found. For this reason, AK BHA opposes granting Pure Nickel the exploration permit that could lead to large scale mineral exploitation.

We believe that mining exploration itself will cause significant negative impacts to the Nelchina herd and the people who utilize it. In all likelihood, the most disruptive result of exploration will be the numerous low elevation helicopter flights and landings, which have been shown to be highly disruptive to caribou, and certainly create an untenable situation for hunters attempting to fill their freezers. Noise from drilling camps, the prolonged presence of workers at these camps, and visual disturbances will also contribute to caribou stress, and will likely cause negative changes to migration habits and foraging behavior.

The Nelchina herd has recently shown signs of nutritional stress. Fires, in particular, have altered summer foraging patterns with the result that many caribou going into the rut are in poor condition, and calves are born small. It is particularly important therefore, that preferred winter foraging and rutting areas within the Tangle Lakes region, be free from disruption that could cause further harm to the herd. **The areas used by the herd in the fall and winter should receive special scrutiny and consideration from DNR during their permit deliberations. This includes the “Beta Complex” which abuts the Denali Highway and the Tangle Lakes/ Delta River Wild and Scenic River System.** These areas are too important to numerous Alaskans to be valued only for their mineral potential.

DNR has a serious responsibility to safeguard the public trust they hold; they must without fail manage the land under their care to respect this trust, and consider the results of their actions not only on current citizens, but on those following. This ethic should be at the forefront of all decisions regarding mineral development in the Tangle Lakes region. The loss of our renewable wildlife resources due to a lack of concern for the same, would be an unforgivable breach of said trust.

Thank you again for your hard work, patience and consideration,

Dave Lyon  
Co-Chair Alaska Backcountry Hunters and Anglers