

Caribou Range - Fire Management Option Change 2025  
Attachment 1 to the Appendix E: Change Approval Form  
Agency Rationale and Intent

1. Under the Alaska National Interest Lands Conservation Act of 1980, the Omnibus Public Lands Act of 2009, Bureau policy in manuals 6100 and 6220, and the Eastern Interior Resource Management Plan, the BLM is mandated to manage for conservation, protection, and restoration of caribou range.
2. The Alaska Department of Natural Resources (DNR) is tasked with developing, conserving, and maximizing the utilization of Alaska's natural resources in a manner that aligns with the public interest. Further, Alaska's Division of Forestry and Fire Protection has a mission outlined in AS41.15.170. The purpose of this provision is to safeguard forested land that is privately owned, owned by the state, or owned by a municipality from wildland fires and other destructive agents, accounting for the values at risk in the area.
3. The USFWS seeks to change the fire management option from "Limited" to "Modified (July 10)" for one parcel (approximately 77,342 acres) on the south-central portion of the Yukon Flats National Wildlife Refuge. The Refuge parcel is a narrow band, up to 3 miles wide, that is currently bounded to the north by "Modified (July 10)" lands and would be bounded to the south by "Modified (July 10)" lands as part of this proposal. The location was selected in consultation with the Bureau of Land Management and the State of Alaska. The change aims to eliminate the need for a time-intensive, non-standard fire response in the parcel; reduce resource impacts on subsistence users; bolster the recovery of declining caribou populations; and protect lichen habitats within the parcel and adjacent lichen-rich BLM lands to the south.

This strategy aligns with Refuge-establishing purposes to conserve fish and wildlife populations and habitat in their natural diversity including, but not limited to, caribou (including participation in coordinated ecological studies and management of the Porcupine and Fortymile caribou herds); and provide the opportunity for continued subsistence use of caribou by local residents (Pub. L. 96-487 Stat. 2371). This strategy also supports the mission of the National Wildlife Refuge System to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans (Pub. L. 105-57; 111 Stat. 1252). By elevating the default response to early season (pre-conversion) fires in this area from "Limited" to "Modified (July 10)", it is expected that annual lichen habitat acres burned in the Refuge and SNCA will be reduced resulting in protection of declining lichen communities in the range of the two caribou herds. Finally, in the future as in the past, as new research and information is analyzed the default response can always be changed.

Fruticose lichen, also known as caribou lichen, is a primary component of a caribou's annual diet with increased significance in winter. This lichen is easily damaged by fire and when burned, takes decades to regrow. Many studies show that areas where lichen has burned come back as shrub fields instead, effectively reducing or eliminating lichen populations in those areas. These jurisdictional agencies do not believe that a "Limited" fire management option on lichen-rich lands adequately addresses this interagency resource management mandate in law, policy, and land use plan.

The BLM has considered or requested a non-standard response for lichen protection on over half the fire starts in the SNCA in the past four years due to these lands' current "Limited" management option status. The significant concentration of industrial (mining) and private structures (cabins) along the Steese Highway corridor means the State would likely request a non-standard response in this region. According to the Alaska Interagency Wildland Fire Management Plan (AIWFMP), lands identified under a "Limited" fire management status may only require infrequent aerial monitoring and not resource commitment; also per the AIWFMP, a non-standard response requires the initiation of a WFDSS as well as other decision documentation that can create an additional workload for all involved. Changing specified lichen-rich areas from "Limited" to "Modified (July 10)" will mitigate the need for a non-standard response, bring decision-making into better alignment with legal, policy, and land use plan requirements, and potentially reduce the workload for all involved jurisdictional and protection units.