



January 4, 2020

BLM Alaska
East Alaska RMP Amendment/EA
222 W. 7th Ave.
Stop 13
Anchorage, Alaska 99513

Re: Notice of Intent to Amend the 2007 East Alaska Resource Management Plan and Prepare the Associated Environmental Assessment

To whom it may concern,

Winter Wildlands Alliance is a national non-profit, whose mission is to promote and protect winter wildlands and quality human-powered snowsports experiences on public lands. Our alliance includes 34 grassroots groups in 16 states, including Alaska, and has a collective membership exceeding 130,000. Winter Wildlands Alliance is part of a larger coalition - Outdoor Alliance – which comprises of ten member-based organizations representing the human powered outdoor recreation community. In addition to Winter Wildlands, the Outdoor Alliance coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation. Outdoor Alliance represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes. The lands near Thompson Pass under consideration in this proposal are of extremely high value for outdoor recreation and many of our members, supporters, and constituents travel to this area – from Alaska and across the nation – to backcountry ski and snowboard, hike, climb, ride bikes, and otherwise enjoy the outdoors.

In the Notice of Intent (NOI) published on November 24, 2020 the BLM states that it intends to prepare an Environmental Assessment for a proposed Amendment to the 2007 East Alaska Resource Management Plan (RMP) and that such an amendment is needed to fulfill provisions of the John D. Dingell, Jr. Conservation, Management, and Recreation Act (Dingell Act). However, the Dingell Act does not require the BLM to perform or prepare a land exchange, or to even amend the RMP. Rather, the Dingell Act requires the BLM to conduct a study of land ownership and use patterns in Alaska's Chugach Region and report the results of this study back to Congress.¹ Nothing in the Dingell Act requires the BLM to amend the RMP at this time, much less to prepare a land exchange. Therefore, this NOI rests on a faulty premise and must be revised. The NOI should read that the BLM intends to conduct a study of land ownership and use patterns in Alaska's Chugach Region, and this should be the focus on the EA.

Furthermore, the RMP states that land exchanges will not be actively sought out until State and Native entitlements are fulfilled.² Amending the RMP to allow land exchanges prior to fulfilling these entitlements, while at the same time analyzing a specific exchange is a dual process that clouds the issues at stake, confuses the public, and does a disservice to anybody with an interest in public land

¹ Dingell Act, Sec. 1113 (b) Chugach Region Land Study.

² 2007 East Alaska RMP, Section I-5b



management in southeastern Alaska. RMP revision is lengthy process with extensive public involvement – one in which the BLM, public, and other stakeholders consider the planning area as a whole, and construct a big-picture management plan that considers each piece of the planning area in concert with the rest. An amendment tailored to allowing a specific land exchange is akin to RMP revision with blinders on. It also undercuts and devalues the RMP revision process – why should the public be motivated to participate in a lengthy administrative process to help shape a RMP if the BLM will simply amend the plan whenever it suits them, or whenever the plan “interferes” with a corporation’s desires? At the very least, the BLM should not present RMP amendment as a formality on the path towards a predetermined action.

Rather than conflating these two separate processes into a single issue, if the BLM wishes to revise the RMP, the agency should conduct a NEPA process that is solely focused on amending the RMP. Once that process is completed, and if the RMP is amended to allow for land exchanges prior to seek out land exchanges prior to fulfilling State and Native entitlements, then the BLM can conduct a separate NEPA process to assess specific land exchange proposals. As currently written, the NOI has generated a great deal of public confusion, as people are unclear what exactly the BLM is requesting comment on – a RMP amendment, a land exchange, or both. It is also unclear whether the amendment would apply to the entire East Alaska RMP or just the parcel identified in the map on the project webpage.³ The NOI and associated documents do not provide clarity on this matter. Therefore, the BLM should issue a revised NOI before moving forward with any aspect of this project.

Aside from our concerns above, there are major flaws with the particulars of this potential exchange including impacts to public access and well-established recreation uses on these parcels, a lack of clarity regarding the acres of subsurface that would be transferred for these parcels, and the NOI’s reference to additional lands being considered in the Bering Glacier area. As an organization for winter recreationists, we are particularly concerned about how this proposal will affect access and opportunities for backcountry skiing.

Thompson Pass is arguably Alaska’s *most* iconic destination for winter backcountry recreation. The “Hairpin Turn” on the Richardson Highway – which abuts the proposed parcels – provides parking for outdoor recreation and is crowded with vehicles throughout the year. The proposed exchange parcels are particularly important for early-midwinter backcountry skiers, as their south-facing slope aspects provide sunshine and slightly longer days in the darkest months of the year. The local guidebook, *Alaska Backcountry Skiing*, describes the opportunities available to skiers who park at the Hairpin Corner pullout. The BLM lands proposed for exchange are the only parcels of BLM land available to skiers who park here, as much of the area is state land and subject to different regulations and land management priorities. These parcels are also a major draw for summer recreation and for subsistence uses such as berry picking and ptarmigan hunting.

The RMP specifically states that the BLM will strive to process mutually benefiting public interest land exchanges with full consideration for efficient management of public lands and to secure important objectives including: protection of fish and wildlife, cultural resource, wilderness and aesthetic values, **enhancement of recreational opportunities**, consolidation of mineral and timber holdings for more logical and efficient management expansion of communities, promotion of multiple use values, and

³ <https://eplanning.blm.gov/eplanning-ui/project/2003781/570>



fulfillment of public needs.⁴ If this land exchange goes through then these public lands would become private, and public access could be prohibited. This will have larger implications for public land access on Thompson Pass. We fail to see how privatization of these lands will enhance recreation opportunities or achieve any of the other goals described in the RMP.

In sum, we encourage the BLM to issue a revised NOI that adheres to the plain language of the Dingell Act and conduct a study of land ownership and use patterns in Alaska's Chugach Region. Any additional action is premature at this time and should not be considered until this study is completed.

Thank you for considering these comments. Please ensure that we are included in any future notifications regarding this, or related, projects.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen".

Hilary Eisen
Policy Director
Winter Wildlands Alliance
PO Box 631
Bozeman, MT 59771
heisen@winterwildlands.org

A handwritten signature in black ink, appearing to read "Louis Geltman".

Louis Geltman
Policy Director
Outdoor Alliance
louis@outdooralliance.org

⁴ 2007 East Alaska RMP, Section I-5a