



Proposed East Alaska Resource Management Plan Amendment and
Environmental Assessment
September 28, 2021
DOI-BLM-AK-A020-2020-0037-RMP-EA

**Glennallen Field Office
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Glennallen, Alaska 99588**

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United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Alaska State Office
222 West Seventh Avenue, #13
Anchorage, Alaska 99513-7504
www.blm.gov/alaska

In Reply Refer To:
1600 (9301)

Dear Reader:

Attached are the East Alaska Environmental Assessment (EA) and signed Finding of No Significant Impact (FONSI) for the Proposed Resource Management Plan (RMP) Amendment. The EA/FONSI/Proposed RMP Amendment were prepared by the Bureau of Land Management (BLM), considering public comments received during this planning effort. This amendment analyzes the impacts of making lands available for exchange in the Thompson Pass Area, managed under the East Alaska RMP. The amendment is necessary for the East Alaska Approved RMP to comply with BLM policy. The Proposed RMP Amendment would amend the 2007 East Alaska RMP to make additional lands available for a potential exchange.

Pursuant to the BLM's planning regulations at 43 CFR 1610.5-2, any person who participated in the planning process for this Proposed RMP Amendment and has an interest which is or may be adversely affected by the planning decision may protest approval of the planning decision contained therein. The BLM will accept protests to the EA/FONSI/Proposed RMP Amendment for 30 days.

The regulations specify the required elements of your protest. Take care to document all relevant facts. As much as possible, reference or cite the planning documents or available planning records (e.g., meeting minutes or summaries, correspondence, etc.).

Instructions for filing a protest with the Director of the BLM regarding the Proposed RMP Amendment may be found online at <https://www.blm.gov/programs/planning-and-nepa/public-participation/filing-a-plan-protest> and at 43 CFR 1610.5-2. All protests must be in writing and mailed to the appropriate address, as set forth below, or submitted electronically through the BLM ePlanning project website at <https://eplanning.blm.gov/eplanning-ui/project/2003781/570>. The BLM encourages submission of protests using ePlanning rather than mail.

Protests submitted electronically by any means other than the ePlanning project website protest section will be invalid unless a protest is also submitted in hard copy. Protests submitted by fax will also be invalid unless also submitted either through the ePlanning project website protest section or in hard copy.

Mailed protests must be in writing and sent to one of the following addresses:

Regular Mail:

Director (210)
Attn: Protest Coordinator
P.O. Box 261117
Lakewood, CO 80226

Overnight Delivery:

Director (210)
Attn: Protest Coordinator
2850 Youngfield Street
Lakewood, CO 80226

All protests must be received within 30 days, by October 28th. Before including your address, phone number, email address, or other personal identifying information in your protest, be advised that your entire protest - including your personal identifying information - may be made publicly available at any time. While you can ask us in your protest to withhold from public review your personal identifying information, we cannot guarantee we will be able to do so.

Pursuant to the BLM's Delegation Manual (MS-1203 Delegation of Authority, Rel. 1-1779) the BLM Director or BLM Assistant Director, Resources and Planning, will make every attempt to promptly render a decision on each protest. The decision will be in writing and will be sent to the protesting party by certified mail, return receipt requested. The decision of the BLM Director or BLM Assistant Director, Resources and Planning, shall be the final decision of the Department of the Interior on each protest. Responses to protest issues will be compiled and formalized in a Director's Protest Resolution Report made available following issuance of the decisions.

Upon resolution of all land use plan protests, the BLM will issue a Decision Record (DR). The DR will be available to all parties on the ePlanning project website.

Sincerely,

**ERIKA
REED**

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FOR Thomas A. Heinlein
Acting State Director

1.0 Introduction

The Bureau of Land Management (BLM) Glennallen Field Office (GFO) has prepared this Proposed Resource Management Plan (RMP) Amendment and Environmental Assessment (EA) to analyze the effects of making lands within the East Alaska Resource Management Plan (2007 East Alaska RMP) available for potential exchange.

The proposed action to amend the 2007 East Alaska RMP is needed to address Section 1113(b)(2)(B) of the John D. Dingell, Jr. Conservation, Management, and Recreation Act (Dingell Act), which requires BLM to identify “sufficient acres of accessible and economically viable Federal land” within the Chugach Region that can be offered in a potential exchange with Chugach Alaska Corporation (CAC). The Chugach Region of Alaska encompasses the lower Cook Inlet and Prince William Sound. It includes the communities of Cordova, Valdez, Whittier, and Seward, and the Alaska Native Villages of Eyak, Chenega, Tatitlek, Nanwalek (formerly known as English Bay), and Port Graham.

This planning process advances the objectives of the Dingell Act by analyzing the effects of making lands within the Chugach Region available for exchange which were prohibited from exchange under the Approved East Alaska RMP. Section 1-5-b of the East Alaska RMP states, “No exchanges would take place [within the RMP Planning Area] until all Native and State entitlements are met. Afterwards, exchanges would be considered in the Chistocina/Slana, Tiekel, and Denali Planning Regions.” (2007, p. 24).

This RMP Amendment/EA is tiered to the environmental impact statement (EIS) associated with the East Alaska RMP (2007). The Final EIS for the East Alaska RMP provides an overview of impacts that were expected to occur in the East Alaska Management Area within which the project area falls (see Map 1).

Through this RMP Amendment/EA the BLM will determine whether lands within the East Alaska planning area near Thompson Pass, Alaska can be made available for any type of exchange (See Map 2). Specifically, this RMP Amendment/EA is looking at making land available for potential exchange of two sections of land, section 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska (see Map 2). These two sections are currently selected by the State of Alaska (State) for potential conveyance; however, the State has provided a conditional relinquishment if these parcels are exchanged with CAC. Each section is 640 acres, for a total of 1,280 acres.

This RMP Amendment/EA would not carry out a land exchange, but rather considers the impacts of making lands available for exchange. Future land exchanges, either those that are in support of the Dingell Act, Alaska Native Claims Settlement Act (ANCSA), Alaska National Interest Lands Conservation Act (ANILCA) or Federal Land Policy and Management Act (FLPMA) of 1976, would be carried out through a separate action which requires a public notice of the exchange. Those carried out under FLPMA would require additional analysis pursuant to the National Environmental Policy Act (NEPA). Implementing regulations can be found at 43 CFR Part 2200.

This RMP Amendment/EA was prepared using the BLM’s planning regulations (43 CFR Part 1600) and guidance issued under the authority of the FLPMA. The associated EA is included in this document to meet the requirements of the NEPA, the Council on Environmental Quality

(CEQ) regulations for implementing NEPA (40 CFR Parts 1500-1508), Department of the Interior (DOI) Implementation of the National Environmental Policy Act of 1969 Final Rule (43 CFR Part 46), and the requirements of BLM's NEPA Handbook H-1790-1 (BLM 2008) and Land Use Planning Handbook H-1601-1 (BLM 2005), as amended by subsequent Instruction Memorandums (IM). FLPMA requires the BLM to amend the RMP and analyze the environmental impacts of making lands available for a potential exchange.

1.1 Purpose and Need

In order to comply with the Dingell Act, the BLM needs to amend the 2007 RMP to address the ability to make exchanges before all Native and State entitlements are met. The purpose of this action is to identify lands the BLM can make available for exchange as required under the Dingell Act. The need is to determine whether BLM-managed public lands within the East Alaska planning area near Thompson Pass, Alaska can be made available for an exchange.

While the Dingell Act also required a Chugach Region Land Study be completed, at this time it is not complete. This study is currently being prepared in collaboration with multiple federal agencies and in consultation with Chugach Alaska Corporation and covers the entire Chugach Region; it is unknown when this study will be finalized and available to the public. However, the aspect of the Study to identify the BLM managed lands that meet the criteria of being 1) accessible, 2) economically viable, and 3) capable of being offered for exchange has been completed. This identification drove the purpose and need of the Amendment, not just in regard to any future exchange which may be identified as possible in the Chugach Region Land Study, but also for any future exchange as the same criteria will likely be used to identify lands that a party would want to receive in an exchange. The recommendations for land exchange options required by the Dingell Act are not required to be linked to the results of the socioeconomic impact analysis in the Chugach Region Land Study. They are separate requirements of the Dingell Act.

The BLM has considerable discretion to define the purpose and need of a project. The NEPA requires that an agency must briefly specify the purpose and need for the action (40 CFR 1501.5, 40 CFR 1502.13). There is no basis for the BLM to wait for the completed Chugach Region Land Study before the BLM develops the Purpose and Need to amend a Land Use Plan for the purposes of making lands available for potential future exchange.

1.2 Project Area

The project area for this RMP Amendment/EA comprises 1,280 acres in Sections 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska, administered by GFO and selected by the State of Alaska. The project area is located east of the city of Valdez, Alaska at approximately Mile 23 of the Richardson Highway (see Map 4).

1.3 Decision to be Made

The decision to be made is whether BLM-managed public lands within the East Alaska planning area near Thompson Pass, Alaska can be made available for an exchange, and under what terms and conditions.

1.4 Reasonably Foreseeable Future Actions

If lands are exchanged, it is reasonably foreseeable that some development in the project area could take place. While it is difficult to speculate on the type of development, access roads and some loss of vegetation is likely if development does occur. Development could be visible from the highway. Development that has occurred in the area is typically adjacent to the highway and includes campgrounds, visitor waysides, lodges and restaurants, helicopter-pads, parking, pull-outs, scenic overlooks, and an Alaska Department of Transportation (AKDOT) maintenance camp. There are rights-of way (ROW) for power lines and for oil transportation in the vicinity. There is a rock quarry at the entrance to Keystone Canyon and gravel sources readily available in Valdez, making gravel development unlikely. The State Heiden View subdivision is located nearby; however, the steep terrain in the project area does not seem conducive to subdivision development. Most businesses that have developed in the area operate seasonally, either in the winter or summer. Any development that would occur would be challenged by access over a large and deep ravine, limits of the steep terrain, winter snow loads and conditions, and cost of development. These sections of land are sub-alpine with short willow and some dwarf birch, and there are no known timber resources. Therefore, timber operations are not likely to occur. The BLM has issued land use permits, authorizations, and special recreation permits for commercial operations in the area of Thompson Pass, but not for these specific parcels of land.

If the lands are not identified for exchange, the lands could be conveyed to the State of Alaska under their current selection. If lands were conveyed to the State, lands are likely to be managed for recreation purposes under the State's Copper Basin Area Management Plan (1986). If State selections were lifted, rejected, or relinquished, the lands would become unencumbered BLM-managed public lands and would be managed in accordance with the East Alaska RMP general management guidelines, or under the East Alaska RMP as amended.

1.5 Public Input and Issue Development

The BLM uses a scoping process to identify potential issues in the preparation for effects analysis. The principal goals of scoping are to identify issues, concerns and potential impacts that require a detailed analysis.

Public notification of the development of this RMP Amendment/EA was initiated on November 24, 2020, on the BLM NEPA ePlanning website (https://eplanning.blm.gov/eplfrontoffice/eplanning/nepa/nepa_register.do). The BLM also issued a press release soliciting scoping comments from the public on November 23, 2020, and again on December 21, 2020, when the scoping period was extended. Additionally, the BLM sent letters directly to potentially impacted federally recognized tribes and Alaska Native Corporations within the project area informing them of the scoping period and inviting them to consult on a government-to-government or government-to-corporation basis. The BLM accepted public scoping comments for 41 days, closing the comment period on January 4, 2021.

The BLM received approximately 143 scoping comment submissions. There were 129 unique comment letters. The BLM reviewed and categorized the public scoping letters and used the planning issues raised in the scoping comments to help guide the development of the range of alternative management strategies for this RMP Amendment/EA. For a detailed description of

those resources of concern identified through public scoping and internal scoping, please refer to Appendix B, Table B-1.

The BLM also solicited public input on the draft East Alaska RMP Amendment/EA/FONSI by conducting a 37-day review and comment period on the draft RMP amendment, which started on June 2, 2021, and held virtual public meetings, in which the BLM presented on the project and environmental analysis and verbally collected comments on the draft RMP amendment. The comment period on the draft RMP amendment was extended by 7 days to allow the public additional time to provide comments, the comment period closed on July 9, 2021.

The scoping period, draft comment period, and virtual scoping meetings were advertised on the BLM web site, through email, on Facebook, Twitter, press releases and in local newspapers. Interested parties were provided four different methods to submit comments, these methods included submitting comments through: letters sent via physical mail, letters submitted via fax, written statements or electronic letters submitted via the BLM's ePlanning project website, and verbal statements at one of the two public meetings held during the 37-day review and comment period. The BLM received comments on the draft from approximately 40 individuals and organizations. All substantive comments from the public have been considered and either incorporated into the EA or the FONSI. Appendix F of this EA summarized the public comments and the BLM responses.

1.5.1 Issues/Concerns Identified for Analysis

Through internal scoping and in consideration of public comments, the BLM has identified the following issues to be considered in the RMP Amendment/EA:

Issue 1 – How would the proposed action described in the alternatives affect recreation management and public access?

Issue 2 – How would the proposed action described in the alternatives affect cultural resources?

Issue 3 – How would the proposed action described in the alternatives affect social and economic conditions?

Issue 4 – How would the proposed action described in the alternatives affect landownership and uses?

1.5.2 Issues Identified but Eliminated from Further Analysis

The BLM has determined that no further analysis is required for the following issues or concerns raised during internal scoping and from public scoping comments for the amendment. These issues were considered in the 2007 East Alaska RMP; that analysis is incorporated by reference where appropriate.

Lands with Wilderness Characteristics

The East Alaska RMP of 2007 did not contain an inventory for Lands with Wilderness Characteristics within the project area. An inventory for presence or absence of wilderness characteristics was completed for the project area in February of 2021 (BLM 2021a). This inventory concluded that Lands with Wilderness Characteristics are not found within the two

sections of land in the project area. The project area does not meet the minimum size criteria (5,000 acres contiguous lands) defined in BLM manual 6310 *Conducting Wilderness Characteristics Inventory on BLM Lands* since it contains only two sections of lands totaling 1280 acres (BLM 2021b). Furthermore, consistent with Section C-2, "There may be some circumstances under which an inventory of the entire area is not required. For example, if a proposed project would only cross a small corner of an inventory unit and would be confined to previously disturbed land that is an unnatural condition, a full inventory may not be necessary" (BLM 2021b, p. 6). In this instance, the project area encompasses only a small corner of the overall managed lands (two sections of land totaling 1,280 acres out of 15,135 acres of BLM managed lands within the area). The lands are not contiguous or adjoining with other lands which have been formally determined to have wilderness or potential wilderness values, or any federal lands managed for the protection of wilderness characteristics. Additionally, the lands are currently managed by the BLM as an Extensive Recreation Management Area (ERMA) (EARMP P. 38). ERMA lands which are also selected by the State of Alaska, as is the case for the land in the project area, are managed as "limited" by BLM and follow the State of Alaska's Generally Allowed Uses (GAU) framework. The GAU framework allows for motorized cross-country travel of OHV's up to 1500 lbs. and large vehicles up to 10,000 lbs. The two sections of land contained within the project area are in close proximity (between .45 and 2.45 miles) to the Richardson Highway, are used by snow machine, OHV's, and tracked vehicles. This known motorized use contributes to disturbances such as vegetation stripping, vegetation crushing, and erosion. Due to these factors, this issue has been eliminated from further analysis.

Water

Within the project area are unnamed lakes/ponds, the Lowe River, and unnamed tributaries to the Lowe River. According to the State of Alaska Department of Natural Resources (AKDNR) water estates mapper, there are no surface or subsurface water rights within the two proposed sections (AKDNR Mapper). There are no sites indicated in the State of Alaska Department of Environmental Conservation (AKDEC) contaminated sites database which might indicate water quality issues or contaminated sites (AKDEC Mapper). In addition, BLM does not have any specific water management projects/plans for the water bodies within the project area.

The East Alaska FEIS/PRMP analyzed and disclosed impacts to water quality from uses such as road and trail construction, recreational use, fire management, vegetation management, and exploration of locatable minerals; this analysis is incorporated herein by reference (pp. 450-463). The FEIS concluded that development could have a negative impact on water quality. During periods of disturbance to vegetation and soils, water quality could be degraded in nearby lakes and streams as turbidity and total dissolved solids (TDS) increase. The amount of increased turbidity and TDS would be a function of the sediment that reaches the water, the volume of water, and the natural amounts of turbidity and TDS. It is assumed that future development that could occur if lands are exchanged would be low intensity and in line with the limited infrastructure and development in the Thompson Pass region. Based on the limited development in the reasonably foreseeable scenario, this plan amendment does not put forward management alternatives that would have a measurable effect on water resources; therefore, this issue was not considered in detail and has been eliminated from further analysis.

Fisheries

The headwaters of the Lowe River, which are primarily fed by Deserted Glacier, flow through Marshall Pass, about 20 miles east of Valdez. From there, it flows through Heiden Canyon, downstream of the BLM-managed public lands. Within the project area there are unnamed lakes/ponds, Lowe River, and unnamed tributaries to the Lowe River. There have not been any fisheries inventories on these waterbodies, but they are not known to support BLM identified sensitive species or contain populations of Threatened or Endangered species. The section of Lowe River that flows through the project area is extremely fast-flowing with heavy glacial sediment during the summer.

The nearest documented salmonid fisheries resources to the project area are Bear Creek and the mouth of Wortmann's Creek. Coho salmon spawning and rearing were documented in Bear Creek near mile 16 of the Richardson Highway. Bear Creek has been formally recognized as anadromous under Alaska state statute AS 16.05.871(a) in the Alaska Department of Fish and Game's (ADF&G) Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes (AWC) as waterbody number 221-60-11370-2321 for coho spawning and rearing (Johnson and Blossom 2019). Wortmann's Creek was also formally recognized as anadromous under Alaska state statute AS 16.05.871(a) in the Alaska Department of Fish and Game's (ADF&G) Catalog of Waters Important for Spawning, Rearing, or Migration of Anadromous Fishes (AWC) as waterbody number 221-60-11370 for coho spawning and rearing (Johnson and Blossom 2019).

There are two lakes nearby the project area that have a fish stocking history. The Alaska Department of Fish and Game, Sport Fish Division stocks rainbow trout in Blueberry Lake and Thompson Lake. These lakes are north of the Richardson Highway and the project area. Grayling were also historically stocked in Thompson Lake. There are no known fisheries inventories in the Thompson Pass Area, except for these stocked lakes. Unnamed lakes and streams in the project area fall within the general range of longnose sucker, Arctic grayling, slimy sculpin, and resident Dolly Varden. This plan amendment is not putting forward management alternatives that would have a measurable effect on fisheries; therefore, no further analysis is necessary.

Visual Resources

The BLM includes four Visual Resource Management (VRM) inventory classifications in the 2007 East Alaska RMP for managing scenic values (BLM 2007, Section V). Through its VRM classification, the BLM ensures that the scenic values of public lands are considered before authorizing uses that may result in adverse visual impacts. The visual resources and aesthetics information classes below provide a baseline for analyzing potential impacts of the Proposed Action. Management objectives for the VRM classifications:

- Class I Objective: "To preserve the existing character of the landscape. The level of change to the characteristic landscape should be very low and must not attract attention."

- Class II Objective: “To retain the existing character of the landscape. The level of change to the characteristic landscape should be low.”
- Class III Objective: “To partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate.”
- Class IV Objective: “To provide for management activities, which require major modification of the existing character of the landscape. The level of change to the characteristic landscape can be high.” VRM classes and their associated resource management objectives apply to all BLM-managed lands.

For this EA, there are no VRM Class I, II and III lands (e.g., Wilderness and Wilderness Study Areas) in the project area (East Alaska FEIS/PRMP pp. 303- 305). It is assumed that future development that could occur would be low intensity, and in line with the limited infrastructure and development in the Thompson Pass region. As such, they are not projected to rise above the impacts expected for VRM Class IV areas. Considering the current limited development and infrastructure in the Thompson Pass region and any reasonably foreseeable development even if an exchange took place, the effects on visual resources would be consistent with BLM Class IV VRM management objectives. Therefore, the impacts to visual resources were not analyzed in further detail in the EA.

Paleontological Resources

The Potential Fossil Yield Classification for the project area is 3a with Moderate Potential for the local geologic strata. The area contains Upper Cretaceous aged volcanic and metamorphosed marine flysch strata from the Valdez Group. This structure may contain invertebrate fossils but has no known vertebrate fossils that would be considered scientifically significant (USGS 2021). Volcanic strata present are unlikely to contain any fossils. The Upper Cretaceous metamorphosed marine flysch has been heavily altered by heat and pressure, likely damaging, warping, or altering any embedded fossils. There are no reported fossils or collections localities in or around the project area. For these reasons, no further analysis is necessary.

Subsistence Use

The lands in the project area are currently selected for conveyance to the State and are not considered “public lands” as defined in the ANILCA Section 102(3). Therefore, these lands do not fall under the regulatory authority of the Federal Subsistence Board and appropriate federal subsistence regulations for harvest of wildlife, fish, and shellfish on federal public lands in Alaska. If the State were to relinquish their selections on these lands, they would become unencumbered BLM-managed public lands and would fall under both ANILCA regulations and State hunting regulations. The State has indicated they would relinquish their selection on these parcels if they were approved for exchange through this planning process. However, the State’s relinquishment is conditional to a conveyance to CAC and would occur simultaneously with conveyance to CAC. If the conveyance to CAC does not occur, the lands would remain as State-selected, BLM-managed public land until the lands were either conveyed to the State or the selections were relinquished or rejected. Hunting would still be permitted and available under

state hunting regulations. Comments received during the scoping period indicate the area is used mainly for berry picking and hunting for hare and ptarmigan. These activities may still occur as long as the area remains under BLM or State management, or the user gets permission from the future landowner. Access to other BLM land for federal subsistence or hunting purposes under State regulations would remain intact through reserved public access easements across any exchanged lands. This plan amendment is not putting forward management alternatives that would have a measurable effect on federal subsistence uses; therefore, no further analysis is necessary.

Wildlife Management

Wildlife expected to be in the area may include grizzly bear, black bear, moose, bald and golden eagle, mountain goat, waterfowl, a variety of migratory birds, and various small mammals and many species of invertebrates (East Alaska FEIS/PRMP, Map 32, 35, 36, 37 and 38). Development would likely displace wildlife species into surrounding suitable habitat, potentially increasing competition locally with individuals of the same species and/or other wild or domestic species utilizing the same ecological niche. Due to the scale of potential development, the sparsely populated surrounding area, and the ample natural habitat in the surrounding area, it is unlikely that displacement of wildlife species would have any significant impacts to wildlife. More detailed species accounts can be provided in the East Alaska Resource Management Plan (2007). Due to lack of potential for significant impacts, not all species receive a full analysis. The East Alaska RMP does not designate any special areas of concern for any wildlife species in the area.

There are no known Endangered Species Act (ESA) Threatened or Endangered species or designated critical habitats present in or near the project area (Environmental Conservation Online System). The area surrounding Valdez is considered bald eagle nesting habitat (East Alaska FEIS/PRMP Map 38); however, the change in land management would not likely affect any of the population in the area as eagles are protected under the Bald and Golden Eagle Protection Act. Migratory bird species are also protected by the Migratory Bird Treaty.

One comment in the scoping period asked the BLM to address trumpeter swans nesting in the project area. Trumpeter swan nesting pairs have high nest site fidelity and will often return to the same nest site year after year. If there were loss of or disturbance to a nesting site, with the amount of suitable habitat in the surrounding area, it is likely the pair would move to another suitable nesting area. If a pair of swans were to need to find a new nesting site, there may be a slight increase in mortality risk and decrease in potential nest success due to the time and energy expenditures necessary to find a new nesting site, which also could be less suitable nesting habitat. Since any habitat disturbance should take place outside of nesting season due to the Migratory Bird Treaty Act, there should be no direct mortality to trumpeter swans related to the project area. There would be no population-level risk to trumpeter swans from the proposed action since there is only potential to disturb the nesting habitat of a few nesting pairs outside of nesting season.

One of the BLM Sensitive bumblebee species, *Bombus bohemicus*, is generally considered to occur in the habitat types found in the project area (BLM 2019). While not known to occur in the

action area, it is possible it could occur onsite. The proposed action would not have any measurable impact on this species due to the limited potential scope of habitat impacted compared to the surrounding potentially suitable habitat. No other known BLM Sensitive species would be impacted by the proposed action.

Hunting within the project area is currently regulated under State hunting regulations. If the State relinquishes its selection or it is rejected, the hunting regulation would fall under both ANILCA subsistence regulations and State hunting regulations. If these lands are exchanged and become privately owned, members of the public would be required to gain permission from the landowner prior to hunting these lands and therefore, wildlife is likely to experience lessened hunting pressure. The plan amendment is not putting forward management alternatives that would have a measurable effect on wildlife resources; therefore, no further analysis is necessary.

Forest and Vegetation Management

Productive timber resources are not present in this project area. The lands in the project area are in a sub-alpine zone, an elevated ecosystem band which exists above the timber line. Sub-alpine ecosystems consist of stunted, clumped balsam poplar and other dwarf willow species and dwarf birch. These stunted trees and shrubs do not exceed 3 meters in height and are no more than 12 cm in diameter at breast-height, therefore, are not considered to be productive timber resources (Pojar and MacKinnon 2013). Further, there is no record of forest disturbance from timber harvest or special forest product harvest in the project area nor do there exist any active timber harvest authorizations in similar alpine ecosystems in Alaska.

The 2007 East Alaska FEIS/PRMP analyzed and disclosed impacts to forest and vegetation from uses such as road and trail construction, recreational use, fire management, vegetation management, and exploration of locatable minerals; this analysis is incorporated herein by reference (pp. 464-473). Possible impacts to vegetation from development could include the direct removal of vegetation, the fragmentation of habitat and habitat loss, and a facilitation of weed invasions. If land within the project area were exchanged in future and development occurs, it is reasonably foreseeable that the proposed action would affect shrubs in the project area. However, the total bio-mass, type and vegetation density precludes them from being viable timber and thus does not warrant further consideration. Other vegetation species present in the project area include those typical of alpine environments such as berry-producing, low-growing bushes, Labrador tea, grasses, and other flowering herbaceous species. Long Leaf Arnica and Arctic Poppy are considered sensitive species by the BLM. The GIS dataset in the Alaska Rare Vascular Plant Database, managed by the University of Alaska Center for Conservation Science, does not have these species recorded in the project area. These species could exist in the project area. If lands were to be exchanged out of federal management, these sensitive species would lose protection as State agencies and private landowners do not have regulatory requirements to protect them. The impacts to these BLM sensitive species, if they are in the area, would only occur with vegetative/ground disturbance. There are no other BLM Sensitive Plant Species found within 45 miles of the project area to consider (AKNHP 2020).

It has been concluded that this action would not introduce any invasive species which might adversely affect the forest. Although occurrences of invasive species have been recorded along

the Richardson Highway in the past, invasive plants have not been found to propagate off the roadway or disturbed areas of the Trans-Alaska Pipeline. Vegetation removal or alteration would not have lasting overall effects to the sub-alpine ecosystem. The shrub classes that exist propagate by aerial seeding and therefore will regenerate naturally and erosion is not expected to occur other than natural rates of erosion and soil deposition processes; therefore, this issue was not considered in further detail. Based on the limited development in the reasonably foreseeable scenario some loss of vegetation is likely if development does occur, however this plan amendment does not put forward management alternatives that would have a measurable effect on vegetation; therefore, this issue was not considered in detail and has been eliminated from further analysis.

Soils

Soils in the plan amendment area have been previously surveyed in 1979 on a very broad scale and lack detail except for use in general land use planning. The USDA Natural Resource Conservation Service (NRCS) is in the process of conducting more intensive soil surveys that will include BLM's planning area. This soil survey and associated ecological site descriptions are within the NRCS North Copper River Area (AK659) of the Southern Alaska Coastal Mountains Major Land Resource Area. No information is publicly available yet except the survey area boundary.

Soil resources may be affected by natural forces and by human activities. Soils also support other resources such as vegetation, water quality, and recreation. There are no sites indicated in the ADEC contaminated sites database (<https://dec.alaska.gov/spar/csp.aspx>) which might indicate soil resource issues or contaminated sites within the planning area. The East Alaska FEIS/PRMP analyzed and disclosed impacts to soils from uses such as road and trail construction, recreational use, fire management, vegetation management, and exploration of locatable minerals; this analysis is incorporated herein by reference (pp. 438-450). The FEIS concluded that development could result in increased soil compaction, soil loss, and erosion. Compaction of native soils could occur through construction activity and excessive vehicle traffic in unpaved areas. Excessive surface water runoff or loss of protective vegetation cover could cause erosion. It is assumed that future development that could occur if lands are exchanged would be low intensity and in line with the limited infrastructure and development in the Thompson Pass region. Based on the limited development in the reasonably foreseeable scenario, this plan amendment does not put forward management alternatives that would have a measurable effect on soil resources; therefore, this issue was not considered in detail and has been eliminated from further analysis.

Public Health and Safety

Amending the East Alaska RMP to make lands available for exchange within the East Alaska RMP planning area would not adversely affect public health or safety. This amendment would not authorize a land exchange, rather it would identify lands that would be available for exchange. The lands potentially available for exchange do not contain any known contamination and would not pose a risk to public health if the lands were developed. Based on the limited development in the reasonably foreseeable scenario, this plan amendment does not put forward

management alternatives that would adversely affect public health and safety. Effects on public health and safety were not considered in further detail and have been eliminated from further analysis.

Mineral Resources

Research has not revealed a comprehensive mineral potential report for the areas of this amendment. The project area is within the Prince William Sound Mining District. This region's primary mineral resources are gold and copper (Koschmann and Bergendahl 1968). Gold bearing quartz veins are widespread in the Southeast Valdez quadrangle. Country rocks to gold bearing quartz in Valdez Group metalflysch can be variably silicified, carbonitized, and sericitized (Goldfarb et al. 1997). Placer gold has been historically mined in the Lowe River which flows through the planning area according to Winkler et al. 1981, though the precise location of mining activity on the river is unknown. There are currently no mining claims within the project area. These sections are State-selected, BLM-managed public lands which are closed to mineral exploration and development at the current time. If lands are conveyed to the State of Alaska or exchanged to a private entity, mineral resources could be developed under state mining regulations; however, it is assumed that if future development were to occur it would be low intensity and in line with the limited infrastructure and development in the Thompson Pass region. The mineral potential classification of low for the East Alaska RMP Amendment is based upon a review of geologic and mineral occurrence reports obtained from several sources (USGS Alaska Resource Data File on Unnamed 2021). Based on the reasonably foreseeable future actions, this plan amendment does not put forward management alternatives that would have a measurable effect on mineral resources; therefore, this issue was not considered in detail and has been eliminated from further analysis.

Environmental Justice

Environmental justice impacts would be present if there is expected to be a disproportionate, negative impact on minority or low-income populations. Visitors to the project area come from a wide variety of locations in Alaska, and elsewhere, and there is no data on the extent to which they may come from low-income or minority populations. If there are local economic or social effects from any changes in recreation use patterns, they would likely be felt most strongly in Valdez. Valdez is not considered to be a minority population. In 2018, 88 percent of the population was "white alone" (not Hispanic or Latino), considering both race and ethnicity; no minority comprised 50 percent of the population, nor was the percentage of minorities present meaningfully greater than that of the surrounding area (data in this section from Economic Profile System 2021). Valdez would not be considered a low-income community because the percent of people below poverty, 9 percent, was lower than that of the State, 11 percent. Valdez also had a much lower percentage of residents who received public assistance income than the statewide percentage. In addition, there would not be a measurable impact on subsistence uses. Therefore, there is no potential for disproportionate, negative impacts to environmental justice populations and no further analysis is needed.

1.6 Planning Criteria

The BLM planning regulations require the development of planning criteria to guide the preparation of an RMP Amendment/EA. Planning criteria are the standards, rules, and other guidelines developed by BLM staff, with public input, for use in forming judgements about plan level decision-making, analysis, and data collection. These criteria guide the development of a plan by helping define decision space or sideboards:

The BLM identified the following planning criteria for this project:

- The RMP Amendment/EA will cover BLM administered, State-Selected lands within sections 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska;
- The RMP Amendment/EA will consider a reasonable range of alternatives;
- The BLM will consider current scientific information, research, new technologies, and monitoring;
- The BLM will ensure consistency with Secretarial Order 3373 (SO 3373) *Evaluating Public Access in Bureau of Land Management (BLM) Public Land Disposals and Exchanges* and BLM Information Bulletin No. 2020-010, which requires documentation of impacts to recreational access as well as a comparison of acres disposed of and exchanged since 2017; and
- The RMP/EA will comply with all applicable law, regulation, policy, executive orders, BLM policy and program guidance.

1.7 Planning Process

When amending an RMP, the BLM uses a multi-step planning process identified in 43 CFR 1600 and the BLM Land Use Planning Handbook (BLM 2005). The following outlines the planning process being adhered to for this project:

- As described in Section 1.5, the BLM provided a 41-day public scoping period after publication of a Notice of Intent in the *Federal Register*.
- Release of the draft RMP Amendment/EA and an unsigned draft FONSI initiated a 37-day public comment period during which the BLM hosted two virtual public meetings.
- The BLM considered substantive and relevant comments received during the public comment period, revised the alternatives and/or impacts analysis as needed, and has publish this PMRPA/EA along with an approved FONSI.
- Release of this Proposed RMP Amendment and EA triggers a 30-day public protest period and 60-day Governor's Consistency Review. The RMP Amendment/EA will not be approved by a Decision Record (DR) until all protests and any consistency issues identified by the Governor's office have been resolved.
- Following the issuance of a DR, implementation-level decisions shall be subject to a 30-day appeal period to the Interior Board of Land Appeals (IBLA).

1.8 Relationship to Statutes, Regulations, Other NEPA Documents

The proposed action complies with federal environmental statutes and regulations, Executive Orders, and Department of Interior (DOI) and BLM policies. Key statutes, regulations, plans and policies with bearing on the planning criteria for the RMP Amendment/EA are listed below:

- East Alaska Resource Management Plan and Approved ROD (2007)
- National Environmental Policy Act (1969)
- Alaska National Interest Lands Conservation Act (1980)
- Federal Land Policy and Management Act (1976)
- Section 106 of the National Historic Preservation Act (1966, as amended)
- Native American Consultation per Executive Orders 13007 and 13175
- BLM Manual and Handbook 1780, Tribal Relations
- Secretarial Order 3373 Evaluating Public Access in Bureau of Land Management (BLM) Public Land Disposals and Exchanges
- Information Bulletin 2020-010 – Implementation of Secretarial Order 3373: Evaluating Public Access in Bureau of Land Management Public Land Disposals and Exchanges
- Section 1113 of the John D. Dingell, Jr. Conservation, Management, and Recreation Act
- State of Alaska Copper River Basin Area Plan (1986)

2.0 Alternatives

2.1 Alternative 1 - No Action Alternative

Under the No Action Alternative, the East Alaska RMP would not be amended to allow land exchanges prior to all Native and State entitlements being met nor in any new geographic areas. For externally generated exchange proposals or applications, the No Action Alternative is generally to reject the proposal or action. Sections 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska (see Map 2) would remain as State-selected, BLM-managed public land until the lands were either conveyed to the State or the selections were relinquished or rejected and became BLM-managed unencumbered public lands. Lands would be managed under the existing East Alaska RMP. The Final EIS for the existing East Alaska RMP provides an overview of impacts that were expected to occur in the East Alaska Management Area within which the project area falls (see Map 1).

2.2 Alternative 2 – Exchange Sections 5 and 6

This alternative identifies two parcels of land in Thompson Pass area, sections 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska (see Map 2), to make available for a potential land exchange through a plan amendment. These two sections are currently selected by the State. If the State selections are relinquished or rejected, these lands would be available for exchange. Each section is 640 acres, for a total of approximately 1,280 acres. A future land exchange would be carried out through a separate action which requires a public notice of the exchange. Those carried out under FLPMA would require additional analysis

pursuant to the National Environmental Policy Act (NEPA). Implementing regulations can be found at 43 CFR Part 2200. Public access and or easements would be reserved for both sections 5 and 6 through the land exchange process. This amendment would not otherwise affect the RMP for these lands.

2.3 Alternative 3 – Exchange Section 5 only

This alternative would amend the East Alaska RMP so that only section 5, Township 9 South, Range 2 West, Copper River Meridian, Alaska (see Map 3) is available for exchange. This alternative was developed based on scoping comments received from the public that Section 6 is heavily used for recreation activities. As in Alternative 2, a future land exchange would be carried out through a separate action which requires a public notice of the exchange. Those carried out under FLPMA would require additional analysis pursuant to the National Environmental Policy Act (NEPA). Implementing regulations can be found at 43 CFR Part 2200. Public access would be reserved across the exchanged lands. This amendment would not otherwise affect the RMP for these lands.

If a land exchange were to occur and lands became privately owned, it is reasonably foreseeable that some development and loss of vegetation could occur. While development could be visible from the highway, it would likely be less visible than Alternative 2, as development would occur further away from the highway, in section 5 only. Any development occurring in section 5 would likely require a ROW or some form of public access from the highway to section 5. Public access and or easements would be reserved for section 5 through the land exchange process. Development that has occurred within the vicinity of Thompson Pass is the same as described in Alternative 2.

2.4 Alternatives Considered but not Analyzed in Detail

An alternative suggested by public scoping comments asked the BLM to consider other lands for exchange instead of the two proposed sections under Alternative 2. The BLM manages relatively few public lands in the Chugach Region. The Dingell Act requires the BLM to identify lands it can make available for land exchange with CAC that are accessible and economically viable. The BLM was unable to identify any lands under its management in the Chugach Region which meet these requirements of the Dingell Act to analyze other than the two proposed sections under Alternative 2. During the development of the purpose and need for this East Alaska RMP Amendment, the BLM considered all BLM-managed lands throughout the Chugach Region within the East Alaska RMP planning area. First, the BLM excluded lands that did not meet the definition of vacant, unappropriated, and unreserved because the land has been designated to a purpose and cannot be offered for exchange. Second, it removed lands which were not considered to be accessible and economically viable, for instance lands located on a mountain top or a glacier. This process led BLM to identify the lands near Thompson Pass as the only lands within the East Alaska Planning Area which meet the requirements of the Dingell Act. The criteria used to identify potential lands for exchange in the Dingell Act would likely also drive the consideration for any future exchange.

3.0 Affected Environment and Environmental Consequences

3.1 How would the Proposed Action Affect Recreational Opportunities and Public Access?

3.1.1 Affected Environment

Lands within the Thompson Pass area are heavily used, road accessible, and provide year-round recreational opportunities. The project area lands, sections 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska are classified as Primitive and Semi Primitive Non-Motorized within the East Alaska Resource Management Plan of 2007. The project area lands are primarily utilized for berry picking, hiking, limited skiing, limited snow machining and snowcat use, and hunting. While exact recreation usage is unknown, 91 people commented during the public scoping period regarding access, recreation management, and general recreation, indicating Thompson Pass is a popular public use area. However, when compared to other lands in Thompson Pass the project area lands are not as highly utilized due to topographical features which limit use. The lands contain a large ravine which runs roughly north to south through the project area. This ravine has steep sides and contains 100-to-200-foot elevation drops and gains east to west which limits the ability of users to access the lands (see Map 2). Since Section 6 is located 0.45 miles from the Richardson Highway and Section 5 begins 1.40 miles from the highway, the project area can be accessed from a north and south highway pullout, as well as the highway shoulder providing access for short duration (a few hours to day-long) recreational pursuits. Thompson Pass is a popular location for hunting of upland game birds, such as ptarmigan, rabbit hunting, and occasional moose hunting. However, in comparison to use occurring throughout Thompson Pass, use in the project area for hunting is minimal. Thompson Pass and the project area offer exceptional views to road travelers. The average annual daily traffic count on the Richardson Highway near the project area is 338 cars per day (Alaska DOT 2021). Currently all portions of the 1,280 acres within the project area are State-selected, BLM-managed public lands. There are an additional 12,800 acres of state lands which are comparable in accessibility and recreational opportunity located within Thompson Pass along the Richardson Highway from milepost 19-37. There are private lands immediately east of the project area. The surface estate of that land is owned by Tatitlek Corporation and subsurface estate is owned by Chugach Alaska Corporation. There is an ANCSA 17(b) public access easement (EIN # 77, C5, G, M) which provides access from the eastern border of the project area through these private lands to public lands further east towards Marshall Pass and the Copper River, (See Map 5).

Secretarial Order 3373 is intended to enhance the DOI efforts to support conservation stewardship; increase outdoor recreation opportunities for all Americans, including opportunities to hunt and fish; and encourage the enjoyment of land and waters managed by the Department. The order ensures that recreational public access is an important value now and in the future as BLM makes decisions involving the disposal or exchange of lands. Public access for purposes of this order should be construed broadly as publicly available access to Federal or State lands (SO 3373). The order also requires discussion of existing access utilized by the public, anticipated impacts to adjacent tracts of publicly accessible lands, and potential increased access to existing

public lands from the proposed exchange. This analysis would be conducted at the time of a proposed exchange.

3.1.2 Environmental Impacts—No Action Alternative

Under the No Action Alternative there would be no effects to recreational opportunities and public access. Existing and future use of the area would remain relatively unchanged. Recreational opportunities and public access, including hunting and fishing as well as encouraging the enjoyment of land and waters managed by the BLM would remain unimpeded. Lands within the project area would remain in public use, selected until such time as they are conveyed to the State, or the selection is relinquished or rejected. If conveyed, the lands would likely be managed under the State's Copper River Basin Area Plan (1986), which recognizes the area as "having very high recreational value" (A-5).

If selections were relinquished, they would become BLM unencumbered public lands and would be managed under the guidance of the East Alaska RMP (2007). "The lands would be managed as Extensive Recreation Management Areas, with recreation based on maintenance of existing Recreation Opportunity Spectrum (ROS) classes in the area. Inventory and monitoring could occur, and standards may be identified for trail density in these areas based on monitoring and inventory information. Some education/interpretation at trailheads may occur, particularly at 17 (b) easement trailheads within these areas." (EARMP, p. 38, 2007). If these lands were retained under BLM management, it is unlikely trail development would occur. There are no developed trails in the project area.

3.1.3 Environmental Impacts—Alternative 2

Alternative 2 would make available for exchange 1,280 acres of BLM-managed public lands currently available for recreation opportunities, hunting, and public access. These lands are accessed from the Richardson Highway and support a wide array of year-round users. However, when comparing overall use of the project area lands in relation to State of Alaska lands in Thompson Pass, use and access is limited by topographical constraints.

The Thompson Pass area is known for its skiing opportunities. However, research and public comments has revealed no formal or well used ski routes within the project area lands. Numerous established ski routes on surrounding State of Alaska lands exist to include Odyssey Arena (Alaska Backcountry Skiing, pages 72-73, Kinney) directly north of the project area and the "Road Run" to the west. Neither of these areas are accessed through or by the lands within the project area. The State manages 12,800 acres of lands in the Thompson Pass area which are comparable in accessibility and recreational opportunity to the project area. It is expected that some users would become displaced and seek other areas for recreational and hunting opportunities, including adjacent state lands. These adjacent state lands would offer essentially the same recreational experiences in a similar setting. The 12,800 acres of publicly accessible State land does include some south facing slopes, lower angle terrain, and is fully road accessible. The surrounding state lands contain fourteen documented ski runs compared to zero documented runs in the project area lands. ([The Map to Alaska's Wilderness - Alaska Guide](#)) The 12,800 acres of land would also offer opportunities for ptarmigan hunting. Alternative 2 would result in approximately a 9 percent loss of lands of similar access and recreational opportunity available for public use. This alternative would link together private lands starting at

about 0.45 miles east of the Richardson Highway continuing in a southeasterly direction down the Tasnuna River to the Copper River.

An exchange would put the lands into private ownership. Alternative 2 would reserve public access at the time of exchange to ensure continued access to public lands and easements beyond the project area. An ANCSA 17(b) public easement (EIN #77, C5, G, M) is currently reserved and accessed via State lands in section 33 of Township 8 South, Range 2 West, Copper River Meridian, Alaska, which then provides access through Marshall Pass and public lands east of the project area. Under this alternative, current users will be displaced, and the entire 1,280 acres currently available for recreational pursuits may no longer be available for public use unless a public easement is retained as a condition of any land exchange. If recreational use is displaced onto nearby State lands, then no change in recreational impacts would be expected, other than some users changing physical locations to conduct similar activities. There would be no significant effects to recreational use or access as a result of this alternative.

3.1.4 Environmental Impacts — Alternative 3

Alternative 3 would make available for exchange all 640 acres of BLM-managed public lands in section 5, Township 9 South, Range 2 West, Copper River Meridian, Alaska which are currently available for recreation opportunities, hunting, and public access. Under this alternative, the 640 acres of BLM-managed public lands in section 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska would be retained by the BLM until such time that the selected parcels are conveyed to the State, or the selections are relinquished or rejected. Both section 5 and 6 can be accessed from the Richardson Highway and support a wide array of year-round users. However, when comparing overall use of the project area lands in relation to other lands in Thompson Pass, use and access is limited by topographical constraints. Research and scoping have revealed no formal or well used ski routes within the project area lands. Numerous established ski routes on surrounding State of Alaska lands exist to include Odyssey Arena (Alaska Backcountry Skiing, pages 72-73, Kinney) directly north of the project area and the "Road Run" to the west. Neither of these areas are accessed through or by the lands within the project area. The surrounding state lands contain fourteen documented ski runs compared to zero documented runs in the project area lands. ([The Map to Alaska's Wilderness - Alaska Guide](#))

Alternative 3 would result in less impact to recreational opportunities and public access than Alternative 2. Due to the proximity of section 6 to the Richardson Highway (.45 miles) versus the proximity of section 5 (1.40 miles), a higher degree of recreational use occurs in section 6. The State manages 12,800 acres of lands in the Thompson Pass area which are comparable in accessibility and recreational opportunity to the project area lands and the 640 acres of BLM managed land in section 5 would remain available for recreation. Alternative 3, which includes 640 acres, would result in approximately a 5 percent loss of lands of similar access and recreational opportunity available for public use.

This alternative would link together private lands starting at about 1.45 miles east of the Richardson Highway continuing in a southeasterly direction down the Tasnuna River to the Copper River. Alternative 3 would reserve public access at the time of exchange to ensure continued access to public lands and easements beyond the project area. An ANCSA 17(b) public easement (EIN #77, C5, G, M) is currently reserved and accessed via State lands in section 33, Township 8 South, Range 2 West, Copper River Meridian, Alaska, which then

accesses Marshall Pass and public lands east of the project area (see Map 5). Current users will be displaced; however, they will not be displaced to the extent of Alternative 2. Alternative 3 includes provisions for establishing a public access easement to allow public travel across section 5. Regardless of the establishment of a public access easement, current users could be displaced from 640 acres in section 5. However, they will not be displaced to the extent of Alternative 2. Displaced users will be able to use other areas for recreation and hunting opportunities, including adjacent State lands. Hunting opportunity specifically would be most affected under this alternative. The section retained is closer to the Richardson Highway, receives more use, and likely contains less overall hunting opportunity due to proximity to noise disturbance and human presence. There would be no significant effects to recreational use or access as a result of this alternative.

3.1.5 Mitigation and Residual Impacts

Establishment of public access easement(s) within sections of land under consideration for exchange would allow for continued access to the Lowe River, through the project area to Marshall Pass, and/or for other uses.

Before any future exchange, the Federal government will determine whether the land it receives in exchange meets the statutory requirements of the authority for the exchange and whether the exchange is in the best interest of the United States (43 CFR 2200.0-6). The EA helps to inform any future decision on an exchange as it analyzes what resources values are lost if the land is conveyed out of Federal ownership.

3.2 How Would the Proposed Action Affect Cultural Resources?

3.2.1 Affected Environment

Historically the Thompson Pass area was a boundary region between the coastal Pacific Eskimo, or Chugach, and the interior Ahtna Athapaskans (Athabascans) (Clark 1984; De Laguna and McClellan 1981). The two groups were reportedly hostile to each other, conducting raids on each other up and down the Copper River for most of the 19th century. However, the Thompson Pass area, reportedly, did not see much use by either group for either travel or subsistence. The State's Alaska Heritage Resource Survey (AHRs 2021) database does not list any prehistoric archaeological sites within several miles of Thompson Pass.

As part of an "All American Route" to newly discovered gold fields in the Copper River Basin and near Eagle City, the U.S. Army sent Captain W.R. Abercrombie to the region in 1898 to locate a more viable route than the Valdez Glacier trail he reported after his 1884 expedition to the interior (Lethcoe and Lethcoe 1996). In June of 1898, an expeditionary party lead by Hospital steward John Cleave located a route above Keystone Canyon, along the Lowe and Tasnuna Rivers through Marshall Pass. However, this route reached the Copper River below an impassible Woods Canyon, between them and the Copper River Basin. Thompson Pass, or "Thomson Pass" as Abercrombie named it, was identified as part of a route to the interior by a member of his party, Corporal Heiden in September 1898, who located and brushed a path around Keystone Canyon, through Thompson Pass into the headwaters of the Tsaina River. The majority of documented or reported historic sites in the Thompson Pass area are related to either

the 1898 “Military Trail,” the “Valdez Trail” or later “Richardson Road,” as well as the roadhouses constructed to serve travelers of the route (AHRs 2021).

The Valdez Trail passed largely to the west and north of the project area. However, a branch trail over Marshall Pass to the Tasnuna River, discovered by Cleave in 1898, was used in 1907 for hauling a 70-ton steamship and related supplies to the Copper River and Northwestern Railroad, which was not yet under construction (Janson, 1975). Horses and sleds were used during the winter of 1907 to freight the steamer, broken down into its parts, from Valdez to the Tasnuna River, where it was reassembled. The steamer, renamed the Chitina, was used on the Copper River, ferrying passengers, and freight from Copper Center down river as far as Abercrombie Rapids. This historic route has been identified by the State of Alaska as traversing from west to east in the two identified sections. It is further identified locally as the “Marshall Pass Trail” or by the State of Alaska as the “Keystone Canyon Thompson Pass Trail”. The Thompson Pass area is named "Tatit'aa Tates" or "back water pass" by the Ahtna, showing that it was recognized by them as a part of a travel route. However, no cultural resource investigations have occurred within the project area to locate or document historic remains associated with this trail.

3.2.2 Environmental Impacts—No Action Alternative

Under the No Action Alternative, the BLM would retain in public ownership approximately two linear miles of the un-surveyed and uninvestigated historic “Marshall Pass Trail” or “Keystone Canyon Thompson Pass Trail”, unless the selected parcels are conveyed to the State. Under the current East Alaska RMP, any BLM discretionary actions that could impact the trail and any associated historic properties would be subject to review under Section 106 of the National Historic Preservation Act (NHPA) before the action occurred; therefore, there are no anticipated environmental impacts.

3.2.3 Environmental Impacts—Alternative 2

Alternative 2 would identify both sections 5 and 6 as available for exchange and could lead to the conveyance from public ownership to private ownership of approximately two un-surveyed and uninvestigated linear miles of the historic “Marshall Pass Trail” or “Keystone Canyon Thompson Pass Trail”. The transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of a property’s historic significance is considered an “adverse effect” (36 CFR 800.5). This alternative has the most potential to adversely impact approximately two miles of historic trail as well as any other undiscovered historic properties, including artifacts and camp sites from the Gold Rush or early 1900’s.

However, prior to any land exchange, and in consultation with the Alaska State Historic Preservation Officer (SHPO), the BLM is responsible for complying with NHPA Section 106: identifying cultural resources on the affected lands (36 CFR 800.4), determining whether there are any adverse effects to eligible cultural resources (36 CFR 800.5), and resolving those adverse effects (36 CFR 800.6).

3.2.4 Environmental Impacts—Alternative 3

Alternative 3 would identify only section 5 (see Map 3) as available for exchange and could lead to the conveyance from public ownership to private ownership approximately one un-surveyed

and uninvestigated linear mile of the historic “Marshall Pass Trail” or “Keystone Canyon Thompson Pass Trail”. The transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of a property’s historic significance is considered an “adverse effect” (36 CFR 800.5).

Approximately one mile of this trail near the Richardson Highway would be retained in public ownership and would not be affected. This alternative has the potential to adversely impact approximately one mile of historic trail as well as any other undiscovered historic properties, including artifacts and camp sites from the Gold Rush or early 1900’s.

However, same as Alternative 2, prior to any land exchange, and in consultation with the Alaska State Historic Preservation Officer (SHPO), the BLM is responsible for complying with NHPA Section 106: identifying eligible cultural resources on the affected lands (36 CFR 800.4), determining whether there are any adverse effects to identified eligible cultural resources (36 CFR 800.5), and resolving those adverse effects (36 CFR 800.6).

3.2.5 Mitigation and Residual Impacts

Compliance with NHPA Section 106 (36 CFR 800) is required prior to any exchange of lands. This process would include cultural resource surveys of the affected lands with the potential for cultural resources or historic properties as well as the documentation of those resources. Mitigation for any adverse effects to eligible properties arising from the exchange of lands with a private owner would require specific consultation about those eligible properties with the Alaska SHPO and any other affected tribes or interested parties, such as the City of Valdez or a local historical society.

3.3 How Would the Proposed Action Affect Social and Economic Conditions?

3.3.1 Affected Environment

The main social and economic consideration for lands under consideration for exchange is existing recreational use and how it could change under the alternatives. Visitors to the project area come from a wide variety of locations in Alaska (and elsewhere) and there is no data on their place of residence. If there are local economic or social effects from any changes in recreation use patterns, they would likely be felt in Valdez more than in any other single community. In 2018, the population of Valdez was about 3,870, a 1.7 percent decrease from 2010 (data in this paragraph from Economic Profile System 2021b). Nearly 90 percent of the population is “white alone” (not Hispanic or Latino) and the per capita income was about \$47,000, considerably above the statewide per capita income of about \$36,000. The population had higher levels of education than statewide averages, with a higher percentage of residents graduating from high school and obtaining bachelor’s or advanced degrees. The industries employing the highest proportion of residents were public administration (24 percent); education, health care, and social assistance (20 percent); transportation, warehousing, and utilities (14 percent); professional, administration, management, and waste management (11 percent); retail

trade (6 percent); and arts, entertainment, recreation, accommodations, and food (5 percent). Valdez is known for its wide variety of outdoor recreation opportunities.

3.3.2 Environmental Impacts—No Action Alternative

As described in Section 1.4, if the lands are not identified for exchange, and are conveyed to the State of Alaska, they would likely be managed for recreation purposes under the existing State plan for the area. If the lands stay as State-selected, BLM-managed lands, or if the lands were to be relinquished by the State of Alaska and become BLM unencumbered lands, they would be managed by the BLM under the EARMP of 2007. In all scenarios, there would be no effects to recreational opportunities and public access. Existing and future use of the area would remain relatively unchanged. Lands within the project area would remain in public ownership and available for recreation use and activities. Because the land usage would not change from its current status, there would be no associated effects on social or economic conditions.

3.3.3 Environmental Impacts—Alternative 2

As described in Section 3.1.3 of this RMP amendment/EA, Alternative 2 would make available for exchange 1,280 acres of public lands currently available for recreation opportunities, public access, and hunting opportunities from BLM management. These lands are accessed from the Richardson Highway and support a wide array of year-round users. It is expected that some users would become displaced and seek other areas for recreational and hunting opportunities, including adjacent state lands. Scoping comments suggested that many current users highly value recreational opportunities in the Thompson Pass area, which includes both the project area and State lands. Commenters identified a variety of winter recreation opportunities to include skiing, snowboarding, and snow machining.

Displaced users could find similar opportunities in the greater Thompson Pass area, although the number of users impacted is not known. Therefore, no social or economic impacts would occur. Local users from Valdez or nearby communities would still be able to have similar recreation experiences, and more-distant users would still travel to the Thompson Pass area, maintaining current spending patterns. If displaced local users were not able to find comparable recreational opportunities in the general area, then they would either have to travel farther or find substitute activities, possibly with a loss in quality. However, with little data on current use patterns by local residents, including how important opportunities in the project area are compared to other current recreational opportunities, it's difficult to say whether quality of life would be affected. Similarly, without data on use patterns from visitors who live farther away, it's not possible to say whether current spending in the local area would be affected if those more-distant visitors were displaced from the exchanged lands. If recreational use is displaced onto nearby State lands, then no change in social or economic impacts would be expected. In summary, the expected social and economic impacts would be minor.

Another complication in estimating social and economic impacts is that we do not know how a potential entity that would receive these lands in exchange would manage the lands. As described in Section 1.4, it is reasonably foreseeable that some development in the project area would take place. Access roads and some loss of vegetation is likely if development does occur and could be visible from the highway. Development in the area is typically adjacent to the highway and includes campgrounds, visitor waysides, lodges and restaurants, helicopter-pads,

parking, pull-outs, scenic overlooks, and an Alaska Department of Transportation (AKDOT) maintenance camp. Rights-of way (ROW) for power lines and for oil transportation exist in the vicinity. Any development that would occur would be challenged by access across a large ravine, limits of the steep terrain, winter snow loads and conditions, and cost of development. There are no known timber resources. The future use is not known with any certainty, however, given the limitations of the terrain, the type and degree of social and economic effects are expected to be minor.

3.3.4 Environmental Impacts— Alternative 3

As described in Section 3.1.4 of this RMP amendment/EA, Alternative 3 would make available for exchange 640 acres of public lands in section 5, Township 9 South, Range 2 West, Copper River Meridian, Alaska, which are currently available for recreation opportunities and public access. Due to the proximity of section 6 to the Richardson Highway (.45 miles) versus the proximity of section 5 (1.40 miles) a higher degree of recreational use occurs in section 6. Current users may be displaced, but not to the extent of Alternative 2.

The social and economic impacts of Alternative 3 would therefore be similar to those described under Alternative 2 but present to a lesser degree.

3.3.5 Mitigation and Residual Impacts

The mitigation measures described in Section 3.1.5 of this RMP amendment/EA would decrease the likelihood of changes in use patterns that could result in social and economic impacts, any social or economic impacts are expected to be minor.

3.4 How Would the Proposed Action Affect Land Ownership and Uses?

3.4.1 Affected Environment

The lands identified in this plan amendment, sections 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska, are State-selected, BLM-managed public lands located about a tenth of a mile east of the Richardson Highway at approximately Milepost 23.5. They are not open for exchange under the current East Alaska RMP. Because these lands are State-selected, the selection would have to be relinquished or rejected before they could be made available for exchange. Exchanges may be proposed to the BLM by any person, State, or local government (43 CFR 2201.1(a)).

The lands north and west of sections 5 and 6 are State conveyed lands (see Map 2). There is a parcel of State-selected, BLM-managed public lands, (6.66 acres) in section 31, Township 8 South, Range 2 West. The lands to the east are patented to the Tatitlek Corporation, and the lands to the south are selected by the Tatitlek Corporation, top filed by the State and BLM-managed public lands.

The vast majority of residential areas and businesses occur from approximately Mile 11 Richardson Highway, on into Valdez. At approximately Mile 16.5 of the Richardson Highway, is other private property, some of which is utilized for recreation and rafting the Lowe River. At approximately Mile 19 Richardson Highway, there is an AKDOT maintenance facility that provides equipment storage for work on Thompson Pass and on into Valdez. From Mile 19 to 20

This a residence and the State Heiden View Subdivision with approximately 15 residences. At approximately Mile 24 Richardson Highway, across the road from the proposed land exchange area, there is a State campground (Blueberry Lake) that is utilized for camping, fishing, and berry picking. At approximately Mile 26.5 Richardson Highway, there is an AKDOT camp to provide equipment storage and crew housing for work on Thompson Pass. At approximately Mile 28.5 Richardson Highway, there is a State recreational area for the Worthington Glacier. At approximately Mile 34.7 Richardson Highway, there is a privately owned lodge, this is also a base for heliskiing activity. At approximately Mile 46 Richardson Highway, there is a privately owned lodge and a residential area. This lodge is also a base for heliskiing activity.

3.4.2 Environmental Impacts—No Action Alternative 1

Under the No Action Alternative, both sections would remain as State-Selected, BLM-managed public lands and would be managed under the direction currently provided for in the East Alaska RMP unless the land is conveyed to the State of Alaska.

3.4.3 Environmental Impacts—Alternative 2

Alternative 2 identifies two parcels of land in the Thompson Pass area, sections 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska, to make available for a potential exchange. If an exchange occurred, these sections would no longer be public lands managed by the BLM. If sections 5 and 6 are exchanged to a private entity there is the possibility that casual use public access would either be restricted or denied. The BLM would negotiate and reserve, at the time of exchange, public access easement(s) within sections 5 and 6. Under Alternative 2, a public access easement would be reserved to ensure continued public access through private property to reach public lands and resources.

3.4.4 Environmental Impacts—Alternative 3

Alternative 3 identifies one parcel of land in the Thompson Pass area, section 5, Township 9 South, Range 2 West, Copper River Meridian, Alaska, to make available for a potential land exchange. If an exchange occurred, section 5 would no longer be public lands managed by the BLM. If section 5 is exchanged to a private entity there is the possibility that casual use public access would either be restricted or denied. The BLM would negotiate and reserve, at the time of exchange, public access easement(s) within section 5. Under Alternative 3, a public access easement would be reserved to ensure continued public access through private property to reach public lands and resources.

3.4.5 Mitigation and Residual Impacts

If lands become available for exchange, at the time of any exchange, the BLM would carry out a Determination of Public Interest per 43 CFR 2200.0-6(b) and would make reservations and restrictions in the public interest, per 43 CFR 2200.0-6(i), such as negotiating and reserving public access easement(s). Public access easements would be reserved through any lands leaving federal management to ensure continued access to public lands and resources adjacent to or beyond the project area.

4.0 Consultation and Coordination

4.1 Federal and State Government Agencies.

The State of Alaska Department of Natural Resources (AKDNR) submitted a conditional letter of relinquishment to the BLM on April 20, 2020. The BLM notified AKDNR, and AKDOT Thompson Pass area managers via email on December 12, 2020, and on December 20, 2020, of the public scoping effort for the RMP Amendment. The State was notified of the comment period on the draft RMP amendment/EA on June 1, 2021. Comments were received from AKDNR during the comment period on the draft RMP amendment/EA.

The City of Valdez is a cooperating agency on this project.

4.2 Government-to-Government Consultation and Regional and Village Native Corporations

Invitations to consult, either on a government-to-government basis or government-to-corporation basis, were sent to the Federally Recognized Tribes and Alaska Native Corporations within the Chugach Region and project area on November 23, 2020, and again on June 1, 2021.

The following Federally Recognized Tribes, Tribes, Tribal Corporations, and Alaska Native Corporations were mailed and called:

Native Village of Eyak, Alaska
Native Village of Chenega, Alaska
Qutekcak Native Tribe, Alaska
Valdez Native Tribe, Alaska
Eyak Corporation, Alaska
Chugach Alaska Corporation, Alaska
English Bay Corporation, Alaska
Port Graham Corporation, Alaska
Tatitlek Corporation, Alaska
Chenega Corporation, Alaska

In response, the BLM received an email from Native Village of Eyak on December 28, 2020, stating that the project was not in their traditional use area and that they would not be further participating in this planning effort. No other comments from Tribes or Alaska Native Corporations were received.

4.3 Media

Use of local and social media is essential in providing adequate notice for the varying stages of the planning process. Radio, Facebook, Twitter, and print media of local and statewide circulation were used to disseminate information concerning scoping and draft RMP amendment public comment period and the planning schedule. The BLM used Valdez public radio station,

KCHU, and KCAM Glennallen, that has a listening area that covers the planning area and broadcasts to all of Prince William Sound and the Copper River Basin. Additionally, press releases were sent to the Statewide news media, including to the Copper River Record, the Copper River Country Journal, the Fairbanks Daily News Miner, the Anchorage Daily News, Alaska Public Meeting, and the Alaska News Source

5.0 List of Appendices

Appendix A—List of Preparers

Appendix B—Table of Issues Considered

Appendix C—Acronyms and Abbreviations

Appendix D—List of References

Appendix E—Maps

Appendix F – Public Comments and BLM Responses

Appendix A: List of Preparers

Name	Title	Resource Area
Cory Larson	Outdoor Recreation Planner	Recreation, LWC, ROS, SO 3373
John Jangala	Archaeologist	Cultural Resources, Paleontology
Casey Burns	Wildlife Biologist	Wildlife, T&E, Subsistence
Brenda Becker	Lands and Realty Specialist	Lands and Realty
Tim Sundlov	Fisheries Biologist	Fisheries
Mike Sondergaard	Hydrologist	Water Quality
Rhonda Williams	Lands and Realty Specialist, CDSO	Public Health and Safety
Stewart Allen	Socioeconomic Specialist	Socioeconomics, Environmental Justice
Denton Hamby	Outdoor Recreation Planner	Visual Resources
Tim Skiba	Forester	Forests and Rangelands Forestry Resources and Woodland Products
Kyle Kraynak	Environmental Protection Specialist	Mineral Resources

Appendix B: Table of Issues Considered

Table B-1: List of Issues Considered

*Possible determinations:

NP = not present in the area impacted by the proposed or alternative actions

NI = present, but not affected to a degree that detailed analysis is required

PI = present and may be impacted to some degree. Will be analyzed in affected environment and environmental impacts. (NOTE: PI does not necessarily mean impacts are likely to be significant, only that there are impacts to this issue, resource, or use. Significance will be determined through analysis and documented in a Finding of No Significant Impact or Environmental Impact Statement.)

Determination*	Issue	Rationale for Determination
NI	Air Quality	As stated in the East Alaska RMP the air quality in the planning area is pristine. This plan is not putting forward management alternatives that would have a measurable effect on air quality; therefore, this issue was not considered in further detail.
NP	Areas of Critical Environmental Concern	There are no areas of critical environmental concerns within the project area.
PI	Cultural Resources	The National Register Eligible Valdez to Eagle gold rush trail as well as a historic branch of that trail through Marshal Pass are located in or near the project area. The proposed Area of Potential Effects has not been archaeologically investigated and could contain cultural resources that would be eligible for the National Register of Historic Places.
NP	Environmental Justice	Low-income or minority populations would not be affected (as described in Section 1.4.2)
NP	Fire Management	Fire Management Specialist does not consider this an issue in the project area. There is no recorded fire history in the area and vegetative fuel types are not conducive to wildfire.

Determination*	Issue	Rationale for Determination
NI	Fish Habitat	<p>The headwaters of the Lowe River flow through Marshall Pass primarily fed by Deserted Glacier about 20 miles east of Valdez. It then soon flows through Heiden Canyon downstream of the BLM-managed land. Within project area there are unnamed lakes/ponds, Lowe River, and 1 unnamed tributaries to the Lowe River. The section of Lowe River that flows through the project area is extremely fast-flowing with heavy glacial sediment during the summer. The nearest documented fisheries resources are Bear Creek and the mouth of Wortmann's Creek. Coho salmon spawning and rearing are documented in Bear Creek near mile 16 of the Richardson Highway. See the Fisheries section of this Amendment for additional information on this resource. This plan amendment does not put forward management alternatives that would have a measurable effect on fisheries; therefore, this issue was not considered in further detail.</p>
NP	Floodplains	<p>No issues identified for floodplains in the project area.</p>
NP	Forests and Rangelands	<p>No issues were identified through public input or internal scoping. There are no valued timber products present in the project area. The proposed action does not put forward management alternatives that would have a measurable impact to forestry resources or products; therefore, no further analysis is required.</p>
NP	Forestry Resources and Woodland Products	<p>No issues identified, and no valued timber products exist on the proposed selected lands; therefore, no further analysis is required.</p>
NI	Invasive, Non-native Species	<p>It has been concluded that this action would not introduce any invasive species which might adversely affect the forest. Although occurrences of invasive species have been</p>

Determination*	Issue	Rationale for Determination
		recorded along the Richardson Highway in the past, invasive plants have not been found to propagate off the roadway or disturbed areas of the Trans-Alaska Pipeline. Reasonably foreseeable vegetation removal or alteration would not have lasting overall effects to the sub-alpine ecosystem, the shrub classes that exist propagate by aerial seeding and therefore will regenerate naturally and erosion is not expected to occur other than natural rates of erosion and soil deposition processes; therefore, this issue was not considered in further detail
PI	Lands and Realty	These two sections of land are selected by the State and are BLM-managed public lands. Any subsequent exchange proposal would include public scoping and recommendations for public access.
NI	Lands with Wilderness Characteristics	The East Alaska RMP of 2007 did not contain an inventory for Lands with Wilderness within the project area. An inventory for presence or absence of wilderness characteristics was completed for the project area in February of 2021 (BLM 2021a). This inventory concluded that Lands with Wilderness Characteristics are not found within the two sections of land in the project area. The project area does not meet the minimum size criteria (5,000 acres contiguous lands) defined in BLM manual 6310 <i>Conducting Wilderness Characteristics Inventory on BLM Lands</i> since it contains only two sections of lands totaling 1280 acres (BLM 2021b). Furthermore, consistent with Section C-2, "There may be some circumstances under which an inventory of the entire area is not required. For example, if a proposed project would only cross a small corner of an inventory unit and would be confined to previously disturbed land that is an unnatural condition, a full inventory may not be necessary" (BLM 2021b, p. 6). In this instance, the project area

Determination*	Issue	Rationale for Determination
		<p>encompasses only a small corner of the overall managed lands (two sections of land totaling 1,280 acres out of 15,135 acres of BLM managed lands within the area). The lands are not contiguous or adjoining with other lands which have been formally determined to have wilderness or potential wilderness values, or any federal lands managed for the protection of wilderness characteristics. Additionally, the lands are currently managed by the BLM as an Extensive Recreation Management Area (ERMA) (EARMP P. 38). ERMA lands which are also selected by the State of Alaska are managed as "limited" by BLM and follow the State of Alaska's Generally Allowed Uses (GAU) framework. THE GAU framework allows for motorized cross-country travel of OHV's up to 1500 lbs. and large vehicles up to 10,000 lbs. The two sections of land contained within the project area are in close proximity (between .45 and 2.45 miles) to the Richardson Highway, are used by snow machine, OHV's, and tracked vehicles and are located within a heavily utilized helicopter supported recreation corridor. This known motorized contributes to disturbances such as vegetation stripping, vegetation crushing, and erosion. Due to these factors, this issue has been eliminated from further analysis.</p>
NI	Migratory birds	<p>The area surrounding Valdez is considered Bald eagle nesting habitat (East Alaska FEIS/PRMP Map 38); however, the change in land management would not likely affect any of the population in the area as eagles are protected under the <i>Bald and Golden Eagle Protection Act</i>. Migratory bird species are also protected by the Migratory Bird Treaty Act. One comment in the scoping period asked the BLM to address Trumpeter swans nesting in the project area. Trumpeter swan nesting pairs have high nest site fidelity and will often return to the same nest site year after year. If there were</p>

Determination*	Issue	Rationale for Determination
		<p>loss of or disturbance to a nesting site, with the amount of suitable habitat in the surrounding area, it is likely the pair would move to another suitable nesting area. If a pair of swans were to need to find a new nesting site, there may be a slight increase in mortality risk and decrease in potential nest success due to the time and energy expenditures necessary to find a new nesting site, which also could also be less suitable nesting habitat. Since any habitat disturbance should take place outside of nesting season due to the Migratory Bird Treaty Act, there should be no direct mortality to trumpeter swans related to the proposed action. There would be no population-level risk to trumpeter swans from the proposed action since there is only potential to disturb the nesting habitat of a few nesting pairs outside of nesting season.</p>
NI	Mineral Resources	<p>Research has not revealed a comprehensive mineral potential report for the areas of this amendment. The project area is within the Prince William Sound Mining District. This region's primary mineral resources are gold and copper (Koschmann and Bergendahl 1968). Gold bearing quartz veins are widespread in the Southeast Valdez quadrangle. Country rocks to gold bearing quartz in Valdez Group metaflysch can be variably silicified, carbonitized, and sericitized (Goldfarb et al. 1997). Placer gold has been historically mined in the Lowe River which flows through the project area according to Winkler et al. 1981, though the precise location of mining activity on the river is unknown. There are currently no mining claims within the project area. These sections are State-selected, BLM-managed public lands which are closed to mineral exploration and development at the current time. If lands are conveyed to the State of Alaska or exchanged to a private entity, the mineral resources could be developed under state mining regulations; however, it is assumed</p>

Determination*	Issue	Rationale for Determination
		that if future development were to occur it would be low intensity and in line with the limited infrastructure and development in the Thompson Pass region. The mineral potential classification of low for the East Alaska RMP Amendment is based upon a review of geologic and mineral occurrence reports obtained from several sources (USGS Alaska Resource Data File on Unnamed 2021). Based on the reasonably foreseeable future actions, this plan amendment does not put forward management alternatives that would have a measurable effect on mineral resources; therefore, this issue was not considered in detail and has been eliminated from further analysis.
NI	Native American Religious Concerns	Consultations are/will be conducted and there is no indication of Native American Religious Concerns.
NI	Noise Resources	Based on the limited development in the reasonably foreseeable scenario this amendment is not putting forward management alternatives nor is approving any action that would have a measurable effect on noise; therefore, this issue was not considered in further detail.
NI	Paleontological Resources	The PFYC classification is 3a with Moderate Potential for this area. The area contains Upper Cretaceous aged volcanic and metamorphosed marine flysch strata from the Valdez Group. This structure may contain invertebrate fossils but no known vertebrate fossils (USGS 2021). Volcanic strata present are unlikely to contain any fossils. The Upper Cretaceous metamorphosed marine flysch has been heavily altered by heat and pressure, likely damaging, warping, or altering any embedded fossils. There are no reported fossils or collections localities in or around the planning area. For these reasons, no further analysis is necessary.

Determination*	Issue	Rationale for Determination
PI	Recreation Resources	The area is accessible and utilized by recreational users. Future exchanges or conveyances could limit or restrict recreational uses or access to the project area.
PI	Socioeconomics	If there are significant changes in use patterns, there could be an economic effect in Valdez. Quality of life could be affected for Valdez residents (and others) if recreational access or opportunities are lost that could not be replaced.
NI	Soils	<p>Soils in the plan amendment area have been previously surveyed in 1979 on a very broad scale and lack detail except for use in general land use planning. The USDA Natural Resource Conservation Service (NRCS) is in the process of conducting more intensive soil surveys that will include BLM's planning area. This soil survey and associated ecological site descriptions are within the NRCS North Copper River Area (AK659) of the Southern Alaska Coastal Mountains Major Land Resource Area. No information is publicly available yet except the survey area boundary.</p> <p>The soils resource may be affected by natural forces and by human activities. Soils also support other resources such as vegetation, water quality, and recreation. There are no sites indicated in the ADEC contaminated sites database (https://dec.alaska.gov/spar/csp.aspx) which might indicate soil resource issues or contaminated sites. BLM does not have any specific projects or plans within the project area that would affect the existing soils. Based on the reasonably foreseeable future actions this plan amendment is not putting forward management alternatives that would have a measurable effect on soil resources, this issue was not considered in further detail and has been eliminated from further analysis.</p>

Determination*	Issue	Rationale for Determination
NP	Threatened, Endangered or Candidate Plant or Animal Species	<p>According to the U.S. Fish and Wildlife Service (USFWS) Environmental Conservation Online System there are no known Endangered Species Act Threatened or Endangered species or designated critical habitats present in or near the project area. No consultation with the USFWS is considered necessary pursuant to section 7 of the Endangered Species Act and none will be undertaken. As such, no further analysis is necessary.</p>
NI	Vegetation	<p>Productive timber resources are not present in this project area. The lands in the project area are in a sub-alpine zone, an elevated ecosystem band which exists above the timber line. Sub-alpine ecosystems consist of stunted, clumped balsam poplar and other dwarf willow species and dwarf birch. These stunted trees and shrubs do not exceed 3 meters in height and are no more than 12 cm in diameter at breast-height, therefore, are not considered to be productive timber resources (Pojar and MacKinnon 2013). Further, there is no record of forest disturbance from timber harvest or special forest product harvest in the project area nor do there exist any active timber harvest authorizations in similar alpine ecosystems in Alaska.</p> <p>The 2007 East Alaska FEIS/PRMP analyzed and disclosed impacts to forest and vegetation from uses such as road and trail construction, recreational use, fire management, vegetation management, and exploration of locatable minerals; this analysis is incorporated herein by reference (pp. 464-473). Possible impacts to vegetation from development could include the direct removal of vegetation, the fragmentation of habitat and habitat loss, and a facilitation of weed invasions. If land within the project area were exchanged in future and development occurs, it is reasonably foreseeable that the proposed action would affect shrubs in the</p>

Determination*	Issue	Rationale for Determination
		<p>project area. However, the total biomass, type and vegetation density precludes them from being viable timber and thus does not warrant further consideration. Other vegetation species present in the project area include those typical of alpine environments such as berry-producing, low-growing bushes, Labrador tea, grasses, and other flowering herbaceous species. Long Leaf Arnica and Arctic Poppy are considered sensitive species by the BLM. The GIS dataset in the Alaska Rare Vascular Plant Database, managed by the University of Alaska Center for Conservation Science, does not have these species recorded in the project area. The species could exist in the project area. If lands were to be exchanged out of federal management, these sensitive species would lose protection as State agencies and private landowners do not have regulatory requirements to protect them. The impacts to these BLM sensitive species, if they are in the area, would only occur with vegetative/ground disturbance. There are no other BLM Sensitive Plant Species found within 45 miles of the project area to consider (AKNHP 2020).</p> <p>It has been concluded that this action would not introduce any invasive species which might adversely affect the forest. Although occurrences of invasive species have been recorded along the Richardson Highway in the past, invasive plants have not been found to propagate off the roadway or disturbed areas of the Trans-Alaska Pipeline. Reasonably foreseeable vegetation removal or alteration would not have lasting overall affects to the sub-alpine ecosystem. The shrub classes that exist propagate by aerial seeding and therefore will regenerate naturally and erosion is not expected to occur other than natural rates of erosion and soil deposition processes; therefore, this issue was not considered in further detail.</p>

Determination*	Issue	Rationale for Determination
NI	Visual Resources	<p>BLM includes four Visual Resource Management (VRM) inventory classifications in the East Alaska RMP for managing scenic values. Of the four, Class I is the most restrictive; Class IV is the least restrictive. The proposed project is within Class IV. In accordance with the East Alaska RMP, VRM Class IV objective is "... to provide for management activities which require major modifications of the existing character of the landscape. The level of change to the characteristic landscape can be high. Management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of these activities through careful location, minimal disturbance, and repeating the basic elements." The effects of the proposed action on visual resources would be consistent with BLM Class IV VRM management objectives. Based on the limited development in the reasonably foreseeable scenario this plan amendment is not putting forward management alternatives that would have a measurable effect on visual resources; therefore, this issue was not considered in further detail.</p>
NP	Wastes, Hazardous or Solid	No issues identified
NI	Water	<p>Within the project area are small unnamed lakes/ponds, the Lowe River, and unnamed tributaries to the Lowe River. According to the State of Alaska Department of Natural Resources (AKDNR) water estates mapper, there are no surface or subsurface water rights within the two proposed sections (AKDNR Mapper). There are no sites indicated in the State of Alaska Department of Environmental Conservation (AKDEC) contaminated sites</p>

Determination*	Issue	Rationale for Determination
		<p>database which might indicate water quality issues or contaminated sites (AKDEC Mapper). In addition, BLM does not have any specific water management projects/plans for the water bodies within the planning area.</p> <p>The East Alaska FEIS/PRMP analyzed and disclosed impacts to water quality from uses such as road and trail construction, recreational use, fire management, vegetation management, and exploration of locatable minerals; this analysis is incorporated herein by reference (pp. 450-463). The FEIS concluded that development could have a negative impact on water quality. During periods of disturbance to vegetation and soils, water quality could be degraded in nearby lakes and streams as turbidity and total dissolved solids (TDS) increase. The amount of increased turbidity and TDS would be a function of the sediment that reaches the water, the volume of water, and the natural amounts of turbidity and TDS. It is assumed that future development that could occur if lands are exchanged would be low intensity and in line with the limited infrastructure and development in the Thompson Pass region. Based on the limited development in the reasonably foreseeable scenario, this plan amendment does not put forward management alternatives that would have a measurable effect on water resources; therefore, this issue was not considered in detail and has been eliminated from further analysis.</p>
NP	Wetlands/Riparian Zones	There are no wetland zones.
NI	Wild and Scenic Rivers	There are no designated WSR's within the proposed project area.

Determination*	Issue	Rationale for Determination
NP	Wilderness and Wilderness Study Areas	There are no congressionally designated Wilderness or Wilderness Study Areas within the project area.
NI	Wildlife	<p>Wildlife expected to be in the area may include grizzly bear, black bear, moose, bald and golden eagle, mountain goat, waterfowl, a variety of migratory birds, various small mammals, and many species of invertebrates. (East Alaska FEIS/PRMP, Map 32, 35, 36, 37 and 38). Development would likely displace wildlife species into surrounding suitable habitat, potentially increasing competition locally with individuals of the same species and/or other wild or domestic species utilizing the same ecological niche. Due to the scale of potential development, the sparsely populated surrounding area, and the ample natural habitat in the) surrounding area, it is unlikely that displacement of wildlife species would have any significant impacts to wildlife. More detailed species accounts can be provided in the East Alaska Resource Management Plan (2007). Due to lack of potential for significant impacts, not all species receive a full analysis. The East Alaska RMP does not designate any special areas of concern for any wildlife species in the area.</p> <p>One BLM Sensitive bumblebee species, <i>Bombus bohemicus</i>, is generally considered to occur in the habitat types in the project area. While not known from the action area, it could occur onsite. The proposed action would not have any measurable impact on this species due to the limited potential scope of habitat impacted compared to the surrounding potentially suitable habitat. No other known BLM Sensitive species would be impacted by the proposed action.</p> <p>Hunting within the planning area is currently regulated under State hunting regulations. If the</p>

Determination*	Issue	Rationale for Determination
		<p>State relinquishes its selection or it is rejected, hunting regulations would fall under both ANILCA subsistence regulations and State hunting regulations. If these lands are exchanged and become privately owned, members of the public would be required to gain permission from the landowner prior to hunting these lands and therefore, wildlife is likely to experience lessened hunting pressure.</p>

Appendix C: Acronyms and Abbreviations

AKDEC	Alaska Department of Environmental Conservation
AKDOT	Alaska Department of Transportation
AKDNR	Alaska Department of Natural Resources
AKNHP	Alaska Natural Heritage Program
ANCSA	Alaska Native Claims Settlement Act
ANILCA	Alaska National Interest Lands Conservation Act
BLM	Bureau of Land Management
CAC	Chugach Alaska Corporation
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DOI	Department of the Interior
DR	Decision Record
EA	Environmental Assessment
EA RMP	East Alaska Resource Management Plan
EO	Executive Order
ESA	Endangered Species Act
FLPMA	Federal Land Policy Management Act of 1976, as amended
FONSI	Finding of No Significant Impact
GFO	Glennallen Field Office
IM	Instruction Memorandum
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
RMP	Resource Management Plan
ROD	Record of Decision
ROW	Right-of-way
SHPO	State Historic Preservation Officer
State	State of Alaska
USGS	U.S. Geologic Survey
VRM	Visual Resource Management

Appendix D: List of References

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Appendix E: Maps

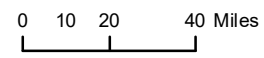
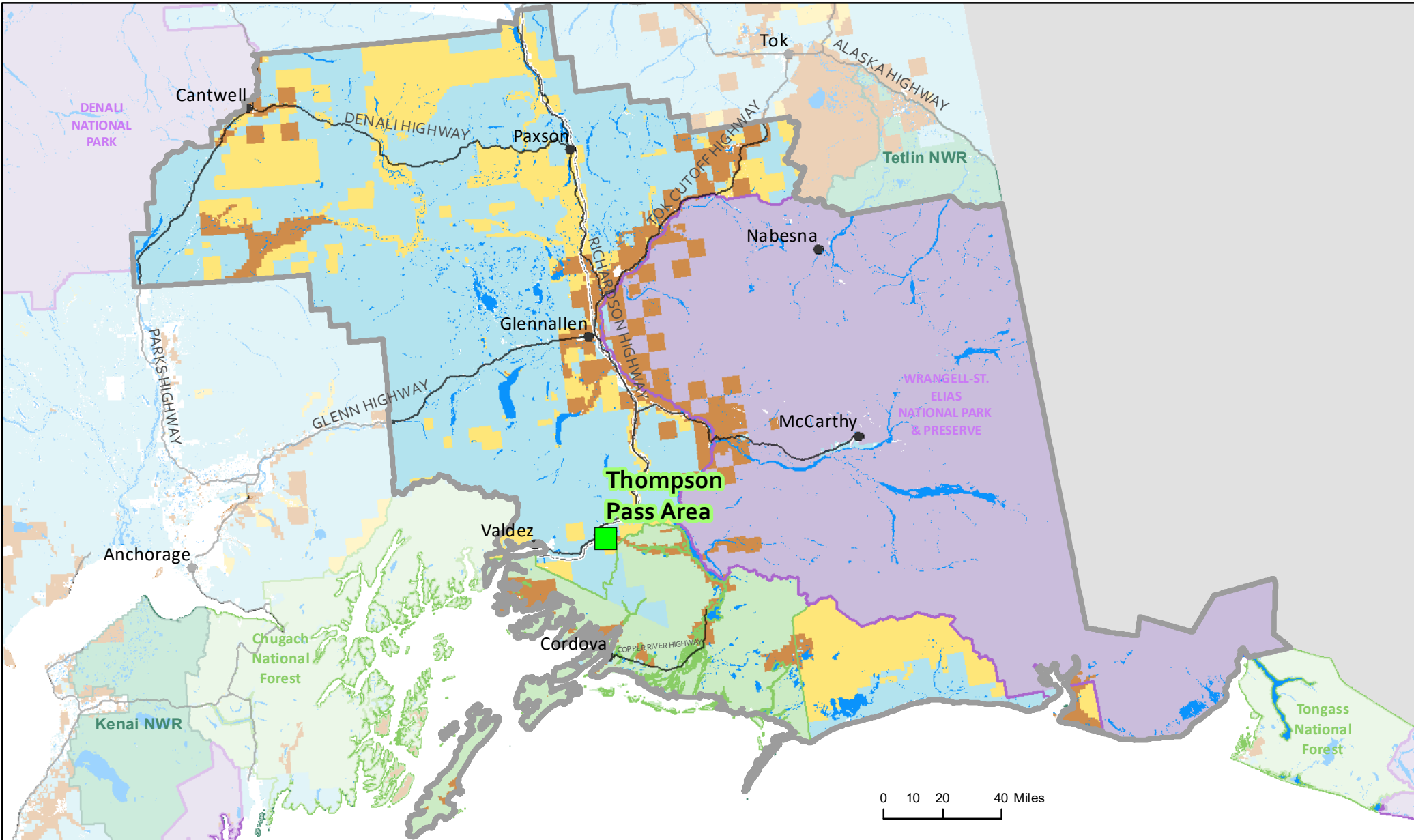
Map 1 - Map of Alaska BLM RMP boundaries

Map 2 – Map of Alternative 2

Map 3 – Map of Alternative 3

Map 4 – Map of Valdez and the planning area

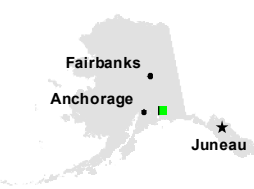
Map 5 – Map of Alternative 2 w/ 17(b) Easement



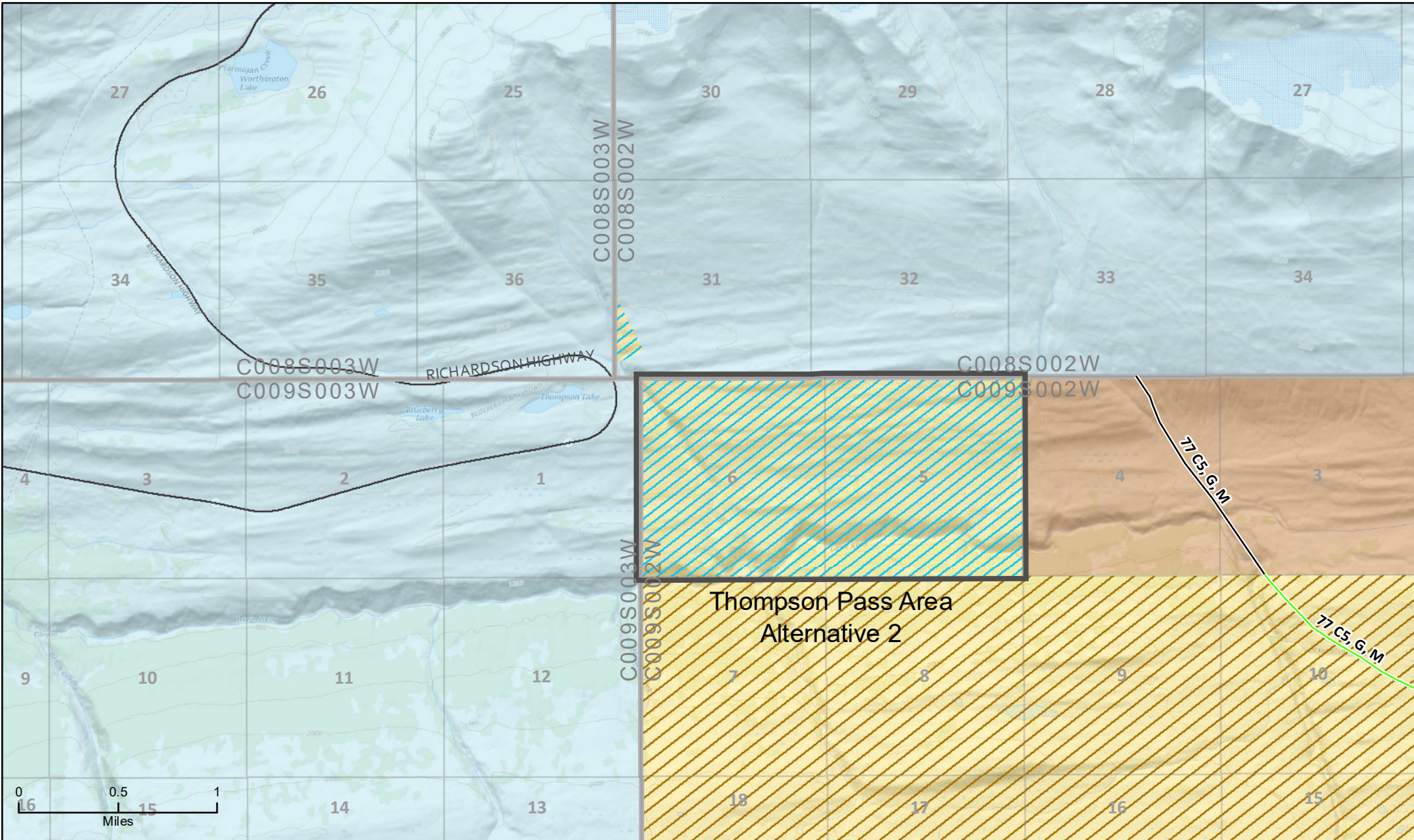
- | | | | |
|------------------------------|---|---------------------------|---------------------------|
| Land Exchange Area | U.S. Fish and Wildlife Service Boundary | Administered Lands | State |
| East Alaska RMP Boundary | U.S. Forest Service Boundary | Bureau of Land Management | Fish and Wildlife Service |
| Trans-Alaska Pipeline (TAPS) | National Park Boundary | National Park Service | Forest Service |
| | | Native Lands | Water |

Disclaimer: No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification. The information displayed on this map should be used for graphic display only. For official land status information, refer to Cadastral Survey plats, Master Title Plats, and land status case-files.

Print date: 8/25/2021



Map 1

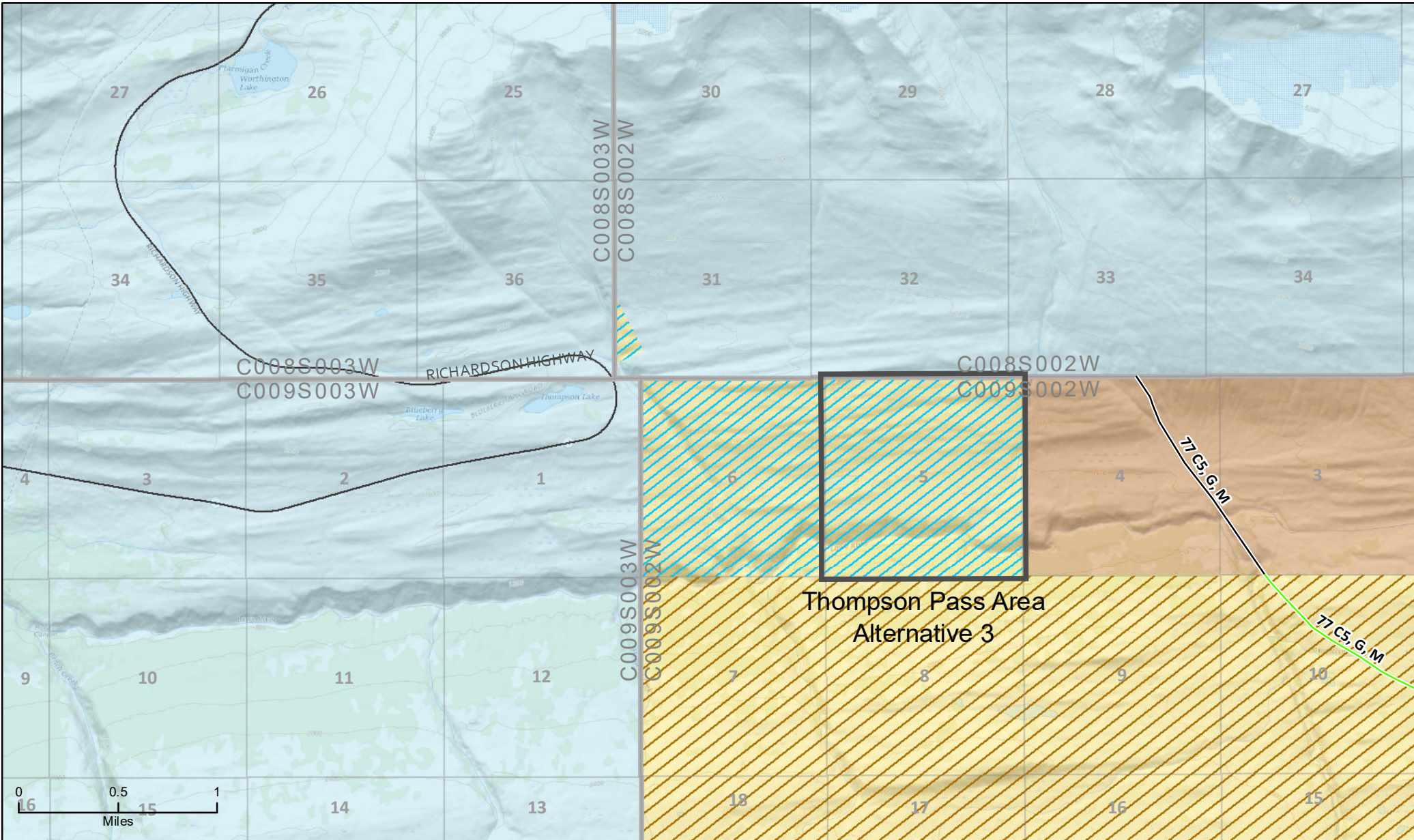


- | | | |
|---------------------------|------------------|--------------|
| Administered Lands | Native Selection | Project Area |
| Bureau of Land Management | State Selection | Section |
| State | 17(b) Easement | Township |
| Native Lands | Nominated | Reserved |

Service Layer Credits: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed June, 2020.

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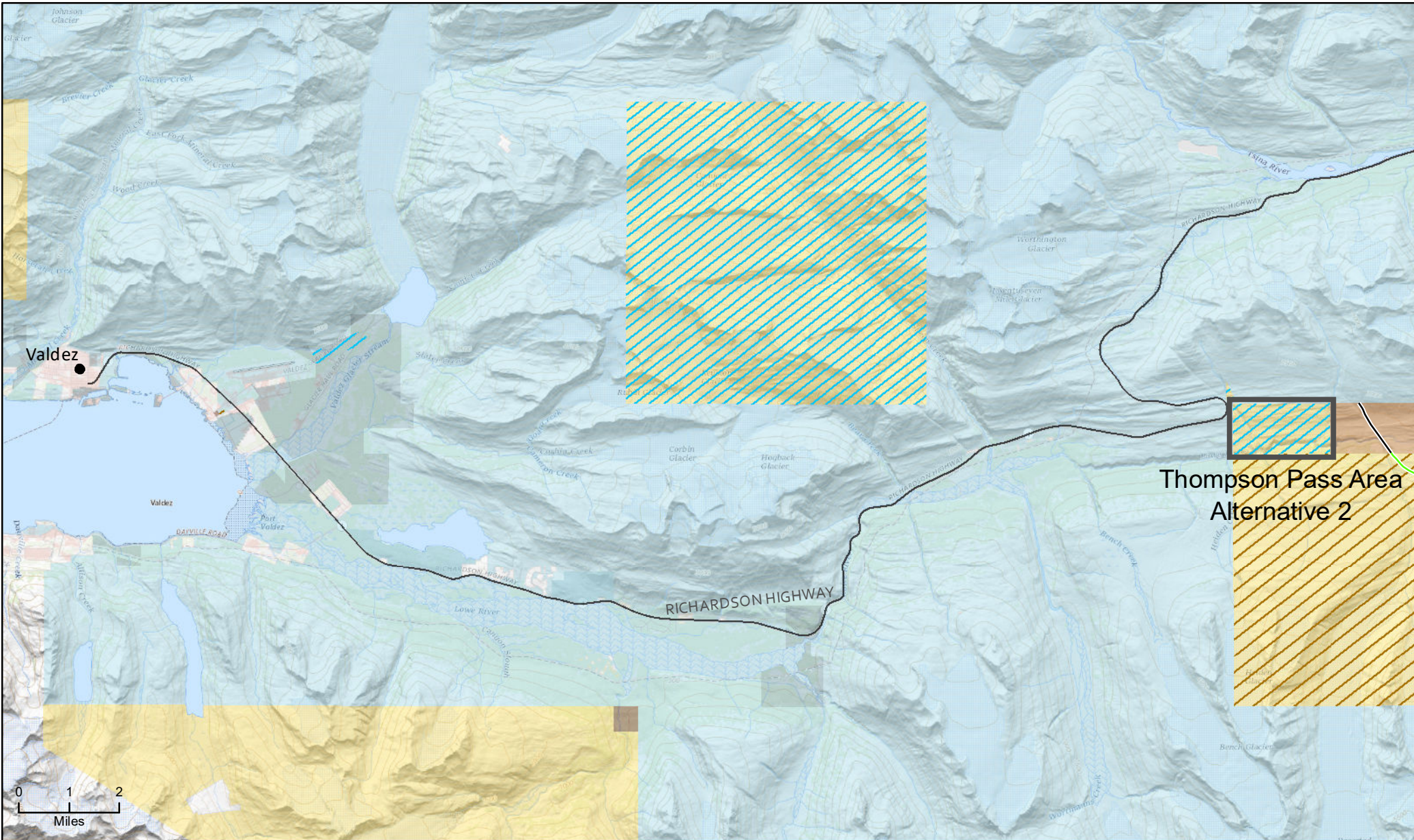


- Administered Lands
- Bureau of Land Management
- State of
- Native Lands
- Native Selection
- State Selection
- 17(b) Easement
- Nominated
- Reserved
- Project
- Section
- Township

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Service Layer Credits: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed June, 2020.



**Thompson Pass Area
Alternative 2**

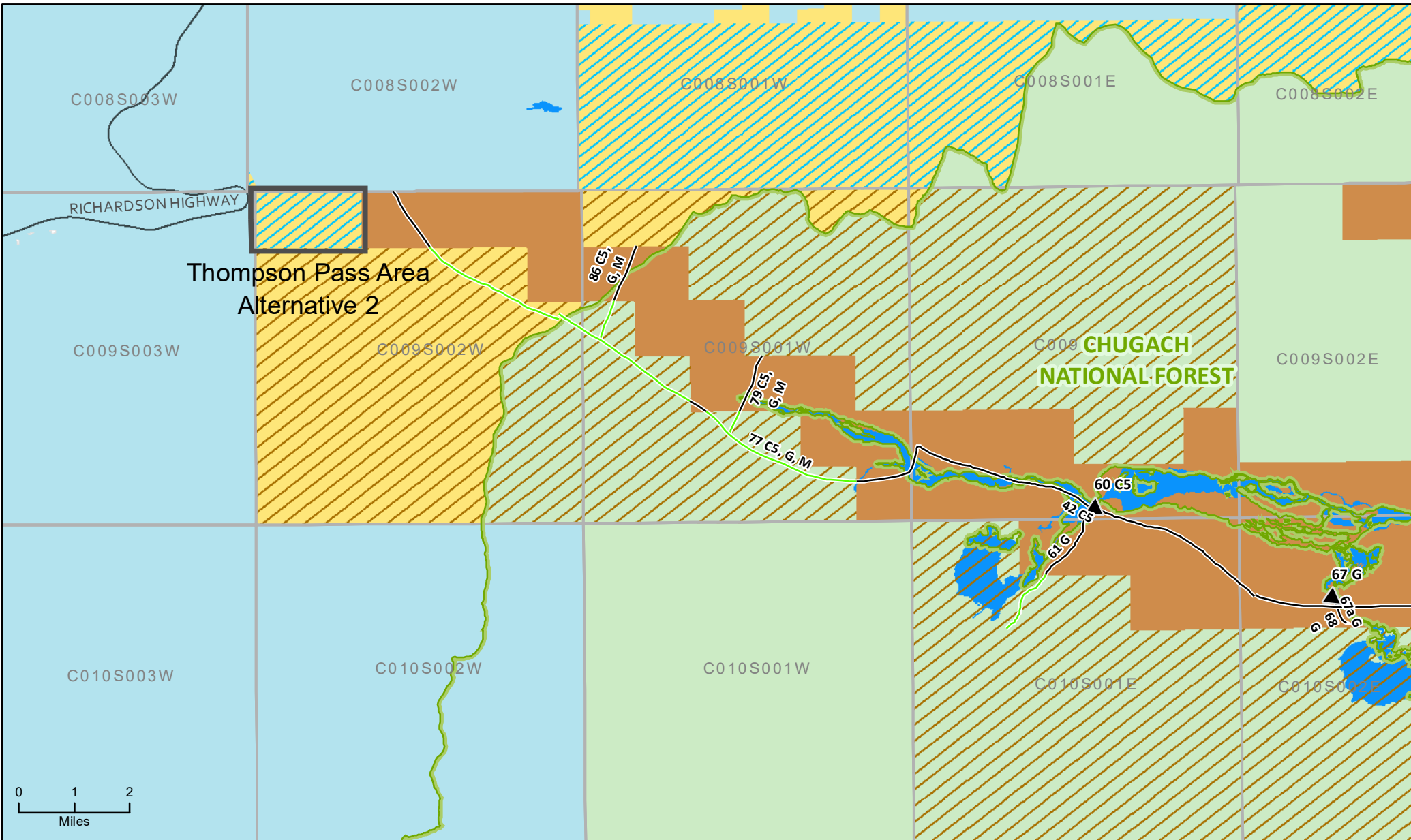
- | | | |
|---------------------------|------------------|----------------|
| Administered Lands | Local Government | 17(b) Easement |
| Bureau of Land Management | Private | Nominated |
| State | Native Selection | Reserved |
| Native Allotment | State Selection | Project Area |
| Native Lands | | |

Service Layer Credits: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed June, 2020.

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Map 4



Administered Lands

- Bureau of Land Management
- Forest Service
- State
- Native Lands

Private

- Water
- State Selection
- Native Selection

17(b) Easement Site

- Reserved
- 17(b) Easement
- Nominated
- Reserved

Project Area

- Township
- U.S. Forest Service Boundary

Disclaimer: No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual or aggregate use with other data. Original data were compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification. The information displayed on this map should be used for graphic display only. For official land status information, refer to Cadastral Survey plats, Master Title Plats, and land status case-files.



Map 5

Appendix F: Public comments and BLM responses

Appendix F: Public comments and BLM responses

Introduction:

After publishing the Draft East Alaska RMP Amendment/Environmental Assessment (EA), the Bureau of Land Management (BLM) held a 37-day public comment period to receive feedback from the public beginning on June 2, 2021. The BLM received comment letters by mail and submissions through the ePlanning website. Comments covered a spectrum of thoughts, support, opinions, ideas, and concerns. The BLM received comments from 40 individuals and organizations/associations.

The BLM recognizes that commenters invested considerable time and effort to submit comments on the Draft EA. For this reason, the BLM developed a comment analysis method to ensure that all comments were considered and then chose to summarize and respond to the public comments in this appendix, see below. Comments similar to each other were grouped under a topic heading, and the BLM drafted a statement summarizing the issues and themes contained in the comments. The responses were crafted to respond to the comments, and, if warranted, a change to the Proposed RMP Amendment/EA was made.

- 1. Multiple comments were received that asserted the BLM violated FLPMA by amending the current RMP to address the environmental impacts of making lands available for a potential exchange.*

The FLPMA requires the BLM to amend an RMP when there is a “change in circumstances or a proposed action that may result in a change in the scope of resource uses or a change in the terms, conditions, and decisions of the approved plan” (43 CFR 1610.5-5). The current East Alaska RMP states, “No exchanges would take place until all Native and State Entitlements are met” (EA, p. 2). The BLM needed to consider whether it was appropriate to amend the current RMP following the passage of the Dingell Act and the requirement for the BLM to “identify sufficient acres of accessible and economically viable Federal land [in the Chugach Region] that can be offered in exchange...” through the Chugach Region Land Study (EA, p. 2; Dingell Act, Section 1113(b)). The Dingell Act’s requirement created a change in the policy to only consider exchanges after all Native and State entitlements are met. Therefore, the BLM initiated this process to review whether lands should be made available for exchange in the East Alaska Planning Area and receive public involvement in the process to inform the decision.

The consideration of the environmental impacts is an integral and necessary step in determining whether BLM should amend an RMP. The BLM performs this analysis through the NEPA process, in this case using an Environmental Assessment, to analyze the foreseeable impacts if the BLM amended the plan to allow a future exchange.

Both of these processes are important and necessary for informed decision-making and are required by the FLPMA and NEPA.

- 2. Multiple comments were received that asserted the BLM failed to properly justify the purpose and need for the East Alaska Plan Amendment because the Dingell Act does not*

require the RMP to be amended and the Chugach Region Land Study is not complete.

The BLM has considerable discretion to define the purpose and need of a project. The NEPA requires that an agency must briefly specify the purpose and need for the action (40 CFR 1501.5, 40 CFR 1502.13). The BLM provides the Purpose and Need for the East Alaska RMP Amendment on page 3 of the EA.

Commenters are correct that the Dingell Act does not specifically require the BLM to amend the RMP. However, the Dingell Act does require the BLM to “identify sufficient acres of accessible and economically viable Federal land [in the Chugach Region] that can be offered in exchange...” through the Chugach Region Land Study (EA, p. 2; Dingell Act, Section 1113(b)). Without a Plan Amendment, the BLM would not be able to identify any lands within the East Alaska RMP area that could be offered for exchange as part of the Chugach Region Land Study because the approved East Alaska RMP states “No exchanges would take place until all Native and State Entitlements are met” (EA, p. 2).

Commenters are also correct that the that the Chugach Region Land Study is not complete. This study is currently being prepared in collaboration with multiple federal agencies and in consultation with Chugach Alaska Corporation and covers the entire Chugach Region; it is unknown when this study will be finalized and available to the public. However, the aspect of the Study to identify the BLM managed lands that meet the criteria of being 1) accessible, 2) economically viable, and 3) capable of being offered for exchange has been completed. This identification drove the purpose and need of the Amendment, not just in regard to any future exchange which may be identified as possible in the Chugach Region Land Study, but also for any future exchange as the same criteria would likely be used to identify lands that a party would want to receive in an exchange.

As stated above, Section 1113 of the Dingell Act created a need for the BLM to consider amending the East Alaska RMP to address potential future exchanges now, instead of after the Native and State entitlements are met. This need formed the underlying basis for the BLM’s Purpose and Need. Section 1.0 *Introduction* of the EA provides additional support and context for the rationale (EA, p. 2). The BLM prepared a reasonable purpose and need and properly justified the purpose and need in the EA.

3. Commenters asserted that the BLM failed to provide an adequate range of alternatives because the BLM did not consider opening all the lands within the EARMP for disposal.

The purpose and need statement dictates the range of alternatives in an EA because action alternatives are not considered “reasonable” if they do not respond to the purpose and need for action; the BLM can only define whether an alternative is “reasonable” in reference to the purpose and need for the action (BLM NEPA Handbook H-1790-1, p. 50). The BLM Purpose and Need for the East Alaska RMP Amendment states, “The purpose of this action is to identify lands the BLM can make available for exchange as required under the Dingell Act. The need is to determine whether BLM-managed public lands within the East Alaska planning area near Thompson Pass, Alaska can be made available for an exchange.” (EA, p. 3).

Action alternatives are described on page 12 and 13 of the EA. Two action alternatives were considered in detail, Alternative 2 that would make available Sections 5 and 6, Township 9 for a

potential land exchange through this plan amendment and Alternative 3 that would make available Section 5, Township 9 for a potential exchange through this plan amendment. Both alternatives are located “within the East Alaska planner area near Thompson Pass...” Any action alternative considered that falls outside of the area near Thompson Pass would not be “reasonable” per BLM National NEPA Policy (BLM NEPA Handbook H-1790-1, p. 50).

The BLM described in Section 2.4, *Alternatives Considered but not Analyzed in Detail* an alternative suggested during public scoping that BLM consider other lands for exchange instead of the action alternatives considered in detail in the EA (EA, p. 13). Section 2.4 is incorporated here by reference. The Dingell Act requires the BLM to identify lands within the Chugach Region that could be available for land exchange with CAC that are “accessible and economically viable”, During the development of the purpose and need for this East Alaska RMP Amendment, the BLM considered all BLM-managed lands throughout the Chugach Region within the East Alaska RMP planning area. First, the BLM excluded lands that did not meet the definition of vacant, unappropriated, and unreserved because the land has been designated to a purpose and cannot be offered for exchange. Second, it removed lands which were not considered to be accessible and economically viable, for instance lands located on a mountain top or a glacier. This process led BLM to identify the lands near Thompson Pass as the only lands within the East Alaska Planning Area which would meet the requirements of the Dingell Act. The criteria used to identify potential lands for exchange in the Dingell Act would likely also drive the consideration for any future exchange.

The BLM has included an adequate range of alternatives in the EA as defined by the BLM’s stated purpose and need.

4. The BLM failed to provide adequate public involvement.

The BLM has provided ample time and opportunity for public involvement. The BLM solicited input from affected community stakeholders by conducting a 41-day scoping period, conducting a 37-day review and comment period on the draft RMP amendment, and holding virtual public meetings in which the BLM presented on the project and environmental analysis and verbally collected comments on the draft RMP amendment. The comment period on the draft RMP amendment was extended by 7 days to allow the public additional time to provide comments. The scoping period, draft comment period, and virtual scoping meetings were advertised on the BLM web site, through email, on Facebook, Twitter, press releases and in local newspapers. Interested parties were provided four different methods to submit comments, these methods included submitting comments through: letters sent via physical mail, letters submitted via fax, written statements or electronic letters submitted via the BLM’s ePlanning project website, and verbal statements at one of the two public meetings held during the 37-day review and comment period. Additional information on the BLM’s outreach effort can be found in section 1.5 of the Proposed RMP Amendment. All substantive comments from the public have been considered and either incorporated into the EA or the FONSI. The BLM adequately involved the public in the EA process.

5. The BLM’s description of reasonably foreseeable future actions is insufficient and therefore does not adequately address effects to BLM-managed resources that would result from making lands within the East Alaska RMP Planning Area available for

potential future exchange.

The BLM received multiple public comments stating the description of reasonably foreseeable future actions needs to be more specific to adequately address potential effects from the action alternatives. Reasonably foreseeable future actions are those for which there are existing decisions, funding, formal proposals, or which are highly probable, based on known opportunities or trends (BLM NEPA Handbook H-1790-1, p. 59). The action alternatives in this EA are limited to making lands within the planning area available for potential future exchange. While Section 1113 makes it more likely the CAC would be the recipient of any future exchange, that Act does not require any exchange actually take place. Therefore, defining a specific exchange or development scenario would be speculative and therefore does not meet the criteria of a reasonably foreseeable future action.

The BLM discloses in Section 1.4 *Reasonably Foreseeable Future Actions* that some development within the 1,280 acres considered for disposal could occur but that any development would be challenged by steep terrain, winter conditions, and cost (EA p. 3). For these reasons, the BLM assumed “low intensity” development for the purposes evaluating the effects of making additional lands available for potential future exchange and to evaluate the differences between action alternatives. This development assumption contains the appropriate level of detail with respect to the BLM’s proposed action.

6. Multiple commentors questioned the need to know what would be offered in exchange for the parcels of lands that were being analyzed in the RMP amendment.

Response (#26-4) The Proposed Action considers making lands in the East Alaska RMP planning area available for potential exchange. In doing so, the BLM does not know what future exchange will occur or is even highly likely to occur but does know with certainty what land could leave Federal ownership as part of the future exchange. Thus, the EA analyzes all of the impacts of this land leaving Federal ownership via an exchange. However, since any future exchange is purely speculative at this stage, the BLM cannot form a reasonably foreseeable scenario for what the Federal government would receive in exchange for these lands. For the purposes of land use planning, it also is not necessary. The question before the Field Manager and State Director is only whether it is proper to make lands available for exchange. Before any future exchange, the Federal government will determine whether the land it receives in exchange meets the statutory requirements of the authority for the exchange and whether the exchange is in the best interest of the United States (43 CFR 2200.0-6). The EA will help inform any future decision on an exchange as it analyzes what resources values are lost if the land is conveyed out of Federal ownership.

7. Multiple comments were received that asserted the BLM should not conduct a land exchange.

The plan amendment looks at adding these two sections to the category of lands that are potentially available for exchange in the RMP. Any subsequent exchange proposal would include public scoping and recommendations for public access. Exchange proposals and terms and conditions of an exchange would be considered subsequent to this planning effort and at the time of an exchange. Exchange regulations and processes are outlined in 43 CFR 2200.

8. Multiple commentors questioned the BLM’s conclusion that similar recreation opportunities exist nearby and the loss in recreation would be significant.

Similar opportunities do exist in the Thompson Pass area. Numerous established ski routes on surrounding

State of Alaska lands exist to include Odyssey Arena (Alaska Backcountry Skiing, pages 72-73, Kinney) directly north of the project area and the "Road Run" to the west. Neither of these areas are accessed through or by the lands concerning this EA. Approximately 500,000 acres of these lands touch the road system. North of the project area, approximately 18 road miles is the BLM's Tielke Special Recreation Management Area. This 60,848-acre management unit is widely known and highly utilized for winter recreation activities to include heli skiing, human powered skiing, snow machining, ice climbing, cross country skiing, and mountaineering. The BLM currently authorizes 7 commercial special recreation permits in this area for winter recreation activities. The 12,800 acres of land used for comparison does include some south facing slopes, lower angle terrain, and is fully road accessible. The 12,800 acres of land would also offer opportunities for ptarmigan hunting. There would be no significant effects to recreational use or access if an easement allowing for access to surrounding public lands was reserved.

9. Comment "Sensitive plant species which appear to be on the land include long leaf arnica, arctic poppy (the bumblebee's favorite hangout, their fit in the petals provides optimal heat absorption) and pacific buttercup."

Long Leaf Arnica and Arctic Poppy are considered sensitive species by the BLM. The GIS dataset in the Alaska Rare Vascular Plant Database, managed by the University of Alaska Center for Conservation Science, does not have these species recorded in the area of the proposed action. The species could exist in the proposed action area. If lands were to be exchanged out of federal management, these sensitive species would lose protection as State agencies and private landowners do not have regulatory requirements to protect them. The impacts to these BLM sensitive species, if they are in the area, would only occur with vegetative/ground disturbance. Using the reasonably foreseeable development scenario in Section 1.4, the EA found this level of development would not have a significant impact on sensitive plant species.

10. A commenter asserted that the BLM did not consider Trumpeter swans using the areas ponds and lakes.

Trumpeter swan pairs have high nest site fidelity and will often return to the same nest site year after year. If there were loss of or disturbance to a nesting site, with the amount of suitable habitat in the surrounding area, it is likely the pair would move to another suitable nesting area. If a pair of swans were to need to find a new nesting site, there may be a slight increase in mortality risk and decrease in potential nest success due to the time and energy expenditures necessary to find a new nesting site, which also could also be less suitable nesting habitat. Since any habitat disturbance should take place outside of nesting season due to the Migratory Bird Treaty Act, there should be no direct mortality to trumpeter swans related to the proposed action. There would be no population-level risk to trumpeter swans from the proposed action since there is only potential to disturb the nesting habitat of a few nesting pairs outside of nesting season. The BLM included this information in the proposed RMP amendment/EA (EA, p. 9, 31-32).

11. A commenter asserted that the BLM failed to consider endangered species in the area.

There are no Endangered Species Act Threatened or Endangered species impacted by the proposed action. The commenter is correct that there are numerous BLM Sensitive Species in Alaska, including 5 bumblebees and a total of 37 animals and 51 plants. These sensitive species are often rare and use specialized habitats. Many BLM sensitive species are unknown in their full distribution in Alaska. One bee species, *Bombus bohemicus*, is generally known to occur in the habitat types in the project area. While not known from the action area, it could occur onsite. The proposed action would not have any significant impact on this species due to the limited potential scope of habitat impacted compared to the surrounding potentially suitable habitat. No other known sensitive species will be impacted by the proposed action. Watchlist species do not have additional review or mitigation requirements but are listed in order to promote monitoring and conservation. Bird species are also protected by the Migratory Bird Treaty Act and eagles

are also protected under the Bald and Golden Eagle Protection Act.