



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

June 30, 2021

Re: Draft East Alaska RMP Amendment/Environmental Assessment/FONSI

To whom it may concern,

Winter Wildlands Alliance and Outdoor Alliance submitted scoping comments regarding this project in January 2020, and we appreciate the opportunity to comment on the draft EA. We remain concerned that the BLM is misinterpreting its obligations under the John D. Dingell, Jr. Conservation, Management, and Recreation Act (Dingell Act). While we appreciate that the BLM has backed away from its original proposal to perform or prepare a land exchange, this EA still rests on the faulty premise that a RMP amendment is necessary to comply with the Dingell Act. The Dingell Act requires the BLM to conduct a study of land ownership and use patterns in Alaska's Chugach Region that assesses the social and economic impacts of the Habitat Protection and Acquisition Program of the Exxon Valdez Oil Spill Trustee Council, identifies sufficient acres of accessible and economically viable Federal land that could be offered in exchange for Chugach Alaska Corporation (CAC) land, provide recommendations for land exchange options, and report the results of this study back to Congress.<sup>1</sup> Amending the RMP to allow a land exchange at this time is premature, and we encourage the BLM to adopt the No Action Alternative.

It appears that the study required by the Dingell Act may have already been completed, and it is confusing as to why it was not included in the project record for review. Page 13 of the EA references a Chugach Region Land Exchange Study (Study). To our knowledge the Study is not available to the public, yet it seems to be integral to this EA as well as the requirements of the Dingell Act. The BLM should make the Study available on the project website. If the Study is not yet complete, then this EA is most certainly premature.

The Dingell Act requires that the Study identify accessible and economically viable Federal land that can be offered in CAC land, yet there is no discussion in this EA of why the two parcels identified - sections 5 and 6, Township 9 South, Range 2 West, Copper River Meridian, Alaska – are considered to be economically viable, or why other parcels of BLM land are not accessible or economically viable. Instead, the EA assumes that sections 5 and 6 are accessible and economically viable while offering no explanation or analysis as to how or why this would be true. It is fairly easy to understand the assumption that these sections are accessible – they are adjacent or nearly adjacent to the highway – but while the Study may offer the answers to economic viability, there's no way to know without the Study being part of the project record. Furthermore, the EA seems to make a case that these sections are *not* economically viable. Section 1.4 of the EA, *Reasonably Foreseeable Future Actions*, states that any development that would occur would be challenged by limits of the steep terrain, winter snow loads and conditions, and cost of development.

Although this EA is premature, if the BLM does move forward with finalizing the EA, it should not only explain why sections 5 and 6 are considered to be economically viable (per the Study), but the Study's

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<sup>1</sup>Dingell Act, Sec. 1113 (b) Chugach Region Land Study.



analysis of economic viability (presumably based off of foreseeable use) should inform the BLM's analysis of potential impacts in this EA. In this EA, the BLM has ducked on its responsibility to analyze potential impacts by claiming that they agency doesn't know the specifics of what use would occur if the lands were exchanged. Surely the Study provides some level of detail concerning potential future uses to support the finding that these sections would be economically viable.

In addition to failing to provide an adequate understanding of reasonably foreseeable future actions, the EA fails to fully analyze the environmental impacts of alternatives 2 and 3. The EA primarily considers the environmental impacts of excluding the public from sections 5 and 6, but there is very little analysis of the environmental impacts of whatever anticipated development formed the basis for the conclusion that these sections are economically viable. Presumably, CAC feels there is potential to develop these lands in some manner – mining, a heli-skiing lodge, or some other use. Therefore, the BLM must analyze the environmental impacts of these possible future actions. It is not reasonable to assume that these lands would remain undeveloped if exchanged, considering the requirement to identify economic viability as part of the land exchange study. Instead, the EA's effects analysis of both action alternatives essentially concludes with, "the use cannot be foreseen and therefore the effects are unknown." While excluding the public from these lands is certainly of great concern, and a significant effect of any potential land exchange, there will no doubt be other, significant, effects if these lands were to be developed.

Finally, in our scoping comments we discussed how a RMP amendment tailored to allowing a specific land exchange undercuts and devalues the RMP and future revision processes. The EA does nothing to alleviate this concern – indeed, the EA fails to discuss how this RMP amendment affects management of the larger planning area or the unique value of these parcels in relation to the BLM's goals for the East Alaska planning area. While the area covered by the East Alaska RMP is quite large, there are very few places within the planning area that are road accessible, and even fewer that are both road accessible and provide access to world-class winter recreation opportunities. As we shared during scoping, Thompson Pass is arguably Alaska's most iconic destination for winter recreation. The "Hairpin Turn" on the Richardson Highway – which abuts the proposed parcels – provides essential parking for outdoor recreation. The BLM lands proposed for exchange are the only parcels of BLM land available to skiers who park here, as much of the area is state land and subject to different regulations and land management priorities. Therefore, exchanging these particular parcels will have an outsized, detrimental, impact on the BLM's goal, as stated in the RMP, to enhance recreation opportunities.

Thank you for considering these comments. Please ensure that we are included in any future notifications regarding this, project, as we did not receive notification from the BLM that the draft EA had been published and was available for comment.

Sincerely,

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

Hilary Eisen  
Policy Director, Winter Wildlands Alliance  
[heisen@winterwildlands.org](mailto:heisen@winterwildlands.org)  
PO Box 631, Bozeman, MT 59771

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

Louis Geltman  
Policy Director, Outdoor Alliance  
[louis@outdooralliance.org](mailto:louis@outdooralliance.org)