

CHANGES FROM DRAFT TO FINAL

A. Introduction

This section summarizes changes that have occurred from the Draft RMP/EIS to the Proposed RMP/Final EIS. Editorial changes will not be described here. It is assumed that all changes needed for accuracy, clarity, consistency, improved readability, and incorporation of improved GIS data have been made based on public comment and internal review.

For a more detailed description of the comments received on the Draft RMP/EIS, the content analysis process, and BLM's responses to those comments see *Appendix J: Responses to Comments* in Volume II of the Proposed RMP/Final EIS.

Throughout the Proposed RMP/Final EIS, any change that has taken place between the Draft and the Final is highlighted in grey. Any new table has only the Table Title highlighted, not all of the information presented in the table. Any new section added (e.g. a new Appendix) has only the Appendix title highlighted, not all of the information in the Appendix. The Table of Contents at the beginning of each chapter highlights new sections added in grey. The master Table of Contents highlights any new map, table, figure, or section of the document in grey.

B. Summary of changes from draft to final

1. Changes to the Draft's preferred alternative that are now a part of the Final's Proposed RMP (Alternative D)

NOTE: These changes required additional analysis in Chapter IV and changes to Chapter II narrative or comparison tables in the Appendices.

- **OHV Management:** Specific trail designations for OHVs for the Delta and Gulkana Wild and Scenic River corridors have been moved from "Implementation-level considerations" to RMP decisions. This change is based on public comment and the need to comply with ANILCA, which allows OHV use in Conservation System Units if OHVs are on designated routes (43 CFR, 36.11).
- **OHV Management:** McCallum Creek drainage has been added to the Delta Mountain sub-unit with appropriate boundaries and acreage changes adjusted in

all tables and on all maps referring to the Delta Mountains sub-unit. This area will be managed to maintain the traditional non-motorized backcountry skiing and mountaineering experiences through a closure on snowmachines. The addition of McCallum Creek is based on supportive public comment as well as a resolution from the BLM Resource Advisory Council. Additional analysis has been added to Chapter IV to consider the effects of the action.

- **Wild and Scenic Rivers:** Wild and Scenic River Suitability determination will be deferred until ANCSA and State entitlements are met. An updated discussion of the eligibility of river segments as well as the addition of Appendix (J) which outlines the Outstandingly Remarkable Values and interim management actions for each eligible river segment are included. This decision (to defer suitability) was based on strong public comment supportive of a valid suitability assessment, something that would be difficult given the current interim land status.
- **Slana:** Disposal actions pertaining to the Slana area have been modified to state that any disposal action taken by BLM after disposal priorities 1 and 2 have been met will be done in close consultation with Ahtna Inc. and the Slana community. Disposals at this stage would be used to consolidate land patterns or provide lands for community infrastructure. Disposal to the general public at large by competitive or modified competitive bid will not be considered. The decision to make this change was based on overwhelming public comment opposing large scale disposal to the public under a competitive bid system.
- **PLO 5150:** Public Land Order (PLO) 5150 will be modified to allow conveyance of approximately 83,000 acres of lands withdrawn for the transportation and utility corridor to the State of Alaska. The area consists of a parcel northeast of Paxson through which the pipeline does not run and several townships to the west of the Delta River by Rainy Creek. This change was made based on comments received from the State of Alaska. Analysis of the effects of this action have been added to Chapter IV and to the ANILCA 810 evaluation.

2. Other changes that required supplementary information added to the Proposed RMP/Final EIS, including minor additions to Chapter III or Chapter IV analysis

- **Access:** RS-2477 routes have been removed from Maps 3 and 4 but not from Map 27. A disclaimer has been added to Map 27 explaining that the routes shown may or may not exist on the ground and encourages consultation with local land owners and managers. The BLM acknowledges R.S.2477s in narrative text in both Chapters II and III. This change was made based on comments by Ahtna, Inc. and others.
- **Access:** Information has been added in Chapters II and III to clearly define BLM's responsibilities in 17(b) easement management, according to law. In addition, text has been added to emphasize that BLM will work cooperatively with Ahtna, Inc. in implementation of a 17(b) easement cooperative plan.

- **Access:** A paragraph has been added in Chapter II to explain BLM's responsibilities in complying with ANILCA as it pertains to transportation and utility systems across conservation system units. This information was added to respond to comments from the State.
- **Access:** A short discussion was added in Chapter III regarding navigable waterways. This is in response to public comment.
- **OHV management/access:** Text added in Chapter II to say that BLM would comply with closure procedures outlined under 43 CFR Part 36.11 in limiting snowmachine use in Conservation System Units (Delta WSR) during implementation-level planning. This addition based on a comment from the State.
- **OHV management:** Trail density information has been added to Chapter III. This information added to respond to public comments asking for more justification to support OHV limitations. This information includes two aerial photos demonstrating high trail density and scale of trail braiding.
- **OHV management:** Justification has been added in Chapter II wherever proposed restrictions to OHV use are discussed under the Proposed RMP. This additional information added to respond to public comment and comment from the State.
- **OHV management/recreation:** Justification has been added for a seasonal motorized closure in the Delta Mountains. This justification was added to respond to comments from the State.
- **Recreation:** Clarification added on motorized use in primitive ROS classes. This addition was in response to several public comments.
- **Recreation:** Appendix H has been added and shows the description of benefits based analysis for each SRMA described in the Proposed RMP (Alternative D). This description is consistent with objectives described for each SRMA in the Draft RMP/EIS. This addition is based on internal (BLM) review of the Draft RMP/EIS and is included to facilitate implementation-level planning for the SRMAs and to provide state-wide consistency in BLM-Alaska land use planning.
- **Recreation:** Discussion of the cumulative effects of the Copper River Princess Lodge on recreation in the planning area is discussed in Chapter IV under Cumulative Effects. This discussion was added based on public comment.
- **Recreation:** Language has been added under specific SRMA descriptions to emphasize that recreation facility development may be avoided in specific areas to maintain primitive recreation experiences. This wording was added to respond to public comment to manage to "keep things the same".
- **Fisheries:** A discussion is included in Chapter III regarding the Gulkana hatchery. Although ADF&G is responsible for population management and oversees the operation of the hatchery, this information is added in response to public comment.
- **Fisheries:** A short discussion of the economic importance of Copper River salmon is added to Chapter III in response to public comments.
- **Fisheries:** ROP F&W-a-6 is modified to include exploratory oil and gas drilling in activities that are excluded within 500 feet of anadromous streams (Appendix C).

This change based on strong public comment for stronger protective measures for anadromous streams.

- **Wildlife:** Information was added to Chapter III Wildlife on the Mentasta caribou herd, Townsend's Warbler, and ptarmigan distribution, based on public comment.
- **VRM:** Visual Resource Management classes changed under Alternative C along the Tok Cut-off Road from VRM Class IV to VRM Class III. Based on comments from Mentasta Village asking BLM to give stronger consideration to the visual resource values in this area.
- **ACECs:** Specific objectives are described for the Bering Glacier RNA under the Proposed RMP. Objectives added to respond to a comment from the State.
- **ACECs:** Added a section in Chapter II, under Alternative Analyzed but not Considered in Detail on why BLM did not consider a Copper River ACEC in it's range of alternatives. This information is added to respond to numerous public comments.
- **Climate change:** More information has been added to Chapter III on climate change and its anticipated effects within the planning area. This information added to respond to public comments.
- **Slana:** The Slana area was added to Chapter II as an area that would be an emphasis area for rights-of-way. Not including this in the Draft RMP/EIS was an oversight on BLM's part.
- **Withdrawals:** Information added to Chapter II to clarify the original purpose of the ANCSA d(1) withdrawals and their review during the land use planning process. In addition, Table 28 was added in Chapter III displaying the major ANCSA d(1) withdrawals. This text added to respond to public confusion about withdrawal review.
- **PLO 5150:** Discussion of potential spill of TAPS on water quality has been added to Chapter IV, Cumulative Effects. Change made based on public comment requesting such a discussion.
- **PLO 5150:** Information added to Chapters III and IV explaining administration of the Trans Alaska pipeline and how revocation of PLO 5150 would effect the administration. This includes a table displaying members of the Joint Pipeline Office. This information added to provided more complete analysis of the alternative B proposal to revoke PLO 5150.
- **PLO 5150:** Text has been added in Chapter II explaining the justification for considering the revocation of PLO 5150 as part of Alternative B.
- **Forestry:** An estimated total anticipated timber harvest (in acres) was added to each alternative in Chapter II. This information added to clarify the scope of the analysis of effects in Chapter IV and added to respond to public concern about acres suitable for timber harvest identified in the Draft RMP/EIS.
- **Minerals:** Wording added in Chapter II and Chapter IV regarding anticipated level of mineral development in different alternatives, based on segregative effects of selected lands, access limitations, and marketability. This information was added to emphasize that revoking a withdrawal and allowing for mineral entry or leasing does not automatically equate to mineral development on every "open" acre. This information added to respond to public concern about effects of mineral development on all areas identified as "open".

- **Minerals:** An additional map has been added showing the specific area of the Bering glacier where existing withdrawals would be revoked. This information provided for clarification.
- **Minerals:** Discussion of the potential for actual mineral development from the opening of eastern 1/3 Bering Glacier RNA to mineral leasing and entry has been added to Chapter IV under Resource Assumptions. This discussion added to address concerns from the Yakutat borough over the likelihood of mineral development in the area and it's potential effects on anadromous streams.
- **Minerals:** More information has been added to Chapter III regarding mining history and activity for the Nicolai Belt and the Chistochina mining district. This responds to public comment and BLM review.
- **Subsistence:** More information has been added to the Chapter III write-up on subsistence, including a description of subsistence use patterns and traditional use areas and subsistence fisheries. This information is added to respond to numerous public comments and to better define subsistence use to provide for a more thorough analysis of the effects of revocation of PLO 5150.
- **ROPs and stips:** Discussion describing monitoring and enforcement of ROPs and Stips has been added to the Introduction of Appendix C. This discussion was added to clarify how ROPs and stipulations are applied in the field and how compliance monitoring takes place. This information added based on public and EPA comment.
- **ROPs and stips:** Required Operating Procedure ROP-Water-c-2 has been modified to not exclude placer mining. This change made based on a comment made by the State.
- **ROPs and stips:** ROP-F&W-a-7 deleted (it was a duplication of 6). ROP-F&W-a-6 modified. It now allows exploratory drilling within 500 feet of fish bearing streams, rivers, and lakes, under frozen conditions, utilizing ice roads. It still excludes oil and gas facilities and roads within 500 feet.
- **Maps:** More location and orientation information has been added to selected maps as scale would allow (meridian lines, township lines, more towns, glaciers, rivers, etc.). This was added in response to public comment.
- **Document Format:** A "How to Read This Chapter" section was added to Chapter II, with an explanation explaining the difference between RMP decisions and implementation-level decisions. This clarification was added to respond to a comment from the State.
- **NEPA:** An alternative comparison table was added to the end of Chapter II. This was added to respond to BLM comments and in order to comply with NEPA.
- **Public Involvement:** Text was added to Chapter V listing the government entities that Glennallen Field Office currently has an MOU with. This was added in response to a request from Ahtna, Inc.
- **Public involvement:** Discussion of public involvement efforts current through the Draft RMP/EIS 90 day public comment period have been included in Chapter I, Chapter V, and Appendix F.
- **Socio-economics:** A more detailed explanation of the expected trend in population growth within the planning area is included in Chapter IV.

3. Minor changes that required only editorial change

- **Access:** Changes have been made throughout the document to recognize and acknowledge valid existing rights. This is in response to a comment by the State.
- **Access:** Clarified language regarding R.S. 2477s in Chapter II and Chapter III . These changes made based on suggestions during BLM review and from the State.
- **Roads:** Miles of existing roads have been added. We have clarified the definition of moderate, slight, and minor as it relates to roads in Chapter IV. These in response to public comment.
- **OHV Management:** Clarified when trails limitations pertain to snowmachines and when they are only for summer OHV use in both the Chapter II narrative and the related tables. Changes made in response to comment by the State.
- **OHV Management:** Included reference to 11AAC 96.025 Conditions for Generally Allowed Uses as well as 11ACC 96.020. This clarification provided in response to a comment from the State.
- **Recreation:** Added consistency in the way commercial use and future limits on commercial use are portrayed throughout the document. Changes made based on a comment received from the State.
- **Recreation:** Updated Recreation Opportunity Spectrum Classes, boundaries and acreages, to reflect improved GIS data.
- **Editorial:** Corrected acreages for Chistochina-Cantwell Travel Management Area in Chapter II. The correct acreage of this area is 683,000 acres. This error was due to inaccurate GIS information.
- **Editorial:** Non-motorized areas in the Delta Range SRMA are referred to as the Delta Mountains Sub-unit, not Canwell and Augustana Sub-units. The management objectives do not change for the different areas and can therefore be expressed as one sub-unit.
- **Editorial:** Clarified roles of BLM and ADF&G with regards to habitat and population management throughout the document. This in response to comments from the State.
- **Selected lands:** Where necessary, we have distinguished between State-selected and Native-selected lands in narrative descriptions. This is particularly important in Chapter II travel management discussions. These changes were made based on comments by Ahtna, Inc.
- **Navigable waterways:** Clarified that all restrictions or limitations on motorized use on navigable waters considered in implementation level planning would be BLM recommendations to the State of Alaska. This is in response to a comment from the State.
- **Water Quality:** Acknowledged all non-point source water pollution prevention measures that are currently in place. This information added to respond to a comment from the State.
- **Wildlife:** The Migratory Bird Treaty Act is cited where appropriate. This in response to comments from Ahtna, Inc.

- **Subsistence:** In Chapter III the percentage of land that is within the Federal Subsistence Boundaries as well as within PLO 5150 is actually 63% not 42% as stated in the Draft RMP/EIS. This figure has been corrected.

Other minor editorial changes are made that are not noted here. Specific changes can be tracked through page references in responses to comments in Appendix J.

4. Summary of additional maps, tables, and figures

- **New maps added to the Proposed RMP/Final EIS:** Map 1 portrays the land managers of the planning area. Map 18 shows the portions of PLO 5150 that will be revoked under Alternative D. Map 26 shows which lands in the Bering Glacier area would be open to oil and gas leasing and mineral entry under Alternative D. Maps 54-57 show Recreation Management Zones for each of the SRMAs. Maps 58-60 show the river segments that are eligible for inclusion into the NWSRS.
- **New Tables added to the Proposed RMP/Final EIS:** Table 12. Subsistence - Alternative Summary; Table 12. Effects Comparison by Issue and Alternative; Table 13. Existing Roads within the Planning Area; 18. Average Trail Densities; Table 28. Major Withdrawals within the Planning Area; Table 29. Members of the Joint Pipeline Office; Table 32. Use of Subsistence Resources; Table 57. Recreation Benefits Based Planning – Delta River SRMA; Tables 58-61 Delta River RMZs 1-4; Table 62. Recreation Benefits Based Planning – Denali SRMA; Tables 63-67 Denali Highway RMZs 1-5; Table 68. Recreation Benefits Based Planning – Gulkana SRMA; Tables 69-72 Gulkana RMZs 1-4; Table 73. Recreation Benefits Based Planning: Tielkel SRMA; Tables 74-76 Tielkel RMZs 1-3
- **New Figures added to the Proposed RMP/Final EIS:** Figure 1. Trail Braiding within the Planning Area; Figure 2. Trail Network within the Planning Area

