BLM Ring of Fire Resource Management Plan Amendment/Supplemental Environmental Impact Statement
Scoping Report
September 2009

Mountains east of Ferebee Glacier

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I. INTRODUCTION

A. Overview, Purpose and Need for the Ring of Fire Amendment

The Anchorage Field Office of the Bureau of Land Management (BLM) finalized the Ring of Fire Resource Management Plan (RMP) by signing the Record of Decision (ROD) in March 2008. The Ring of Fire RMP provides a comprehensive framework for managing and allocating uses of the public lands and resources within the Ring of Fire planning area. The Ring of Fire ROD deferred the final determination on whether or not to designate an Area of Critical Environmental Concern (ACEC) in the Haines Block. Designation of an ACEC is made through the land use planning process, therefore the Ring of Fire RMP needs to be amended in order to address the ACEC issue. In addition, land use plan decisions establish goals and objectives for resource management (i.e. desired future conditions and best management practices), the measures needed to achieve these goals and objectives, and the parameters for resource uses on BLM-administered public lands.

The Ring of Fire RMP designated a Special Recreation Management Area (SRMA) in the Planning Area when the ROD was signed. BLM is revisiting the need for this SRMA because SRMA designation criteria have changed and significant land conveyance has occurred in the Planning Area. Lands that were managed by BLM have been conveyed to the State of Alaska causing permits that were issued by BLM on those lands to be terminated. The one permittee who operates in the SRMA has indicated that their most visited landing site is no longer safe due to melting of the glacier. They are in the process of moving those landings, which equal half of all their landings on BLM lands, to Meade Glacier in the Tongass National Forest.

The purpose of the Ring of Fire RMP Amendment/Supplemental EIS is to

1. Make a final determination on the designation of an ACEC in the Haines Block.
2. Re-evaluate the need for an SRMA.
3. Evaluate terms and conditions for special recreation permits in the planning area.

B. Description of the Planning Area

The Haines Block consists primarily of glacially covered mountains in the Coastal Mountain Range to the northwest of Skagway and Haines and in the Chilkat Range to the south/southwest of Haines. BLM-managed lands are bordered by Canada to the north and Glacier Bay National Park and Wilderness to the south with State and private lands bisecting the two Federally-owned portions. There are no roads or trails on BLM-managed lands in the planning area. The only structure managed by BLM is the Dalton Cache located on the Haines Highway at the U.S./Canada Border.

Population centers in the planning area include Haines, Skagway and the native village of Klukwan. All three towns are accessible by road.

C. Description of the Scoping Process

A Notice of Intent (NOI) to prepare the Ring of Fire RMP Amendment/Supplemental Environmental Impact Statement (EIS) was published in the Federal Register on March 26, 2009. The NOI initiated a 90-day formal scoping period that lasted until June 24, 2009. Public meetings were held during the scoping period in the communities of Haines, Skagway, and Anchorage.

The purpose of each meeting was to introduce the public to the Ring of Fire RMP Amendment and elicit public comment. Information presented at the meetings included:

- The purpose for amending the Ring of Fire RMP
- Boundaries of the planning area and changes in land status since the signing of the Ring of Fire ROD
- The Planning Schedule
- Planning Criteria
- A framework for the Plan Amendment including:
    - Specific regulatory criteria for "Relevance and Importance" which relate to the Area of Critical Environmental Concern designation.
    - Criteria used to designate a SRMA.
- Specific examples of decisions that might be made in the amendment.

The format of each meeting was open house. The Anchorage Field Manager, Ring of Fire RMP Amendment Team Lead, and Anchorage Field Office Recreation Planner were on hand at each meeting to explain the purpose of the amendment, answer questions regarding the planning effort and BLM policy and regulations, and elicit public comment on the planning criterion for BLM-managed lands. Maps of the Haines Block were available at each meeting for review. A general letter to the public announcing scoping and explaining the focus of the RMP Amendment was available at each meeting as well as land status maps of the planning area and comment forms for the public to take with them if they preferred to make comments at their leisure.

The BLM contacted the Chilkat Tribal Council regarding their desire for a government-to-government consultation during scoping. The Chilkat Tribal Council was unavailable for consultation during scoping.

Concurrent with the beginning of the scoping period the BLM developed a Ring of Fire RMP Amendment/Supplemental EIS planning website. The website has included the schedule of public meetings, information on the planning process, links to BLM criteria for allocation decisions made through the planning effort, links to all Ring of Fire RMP documents, and information on how to participate during the planning process. All planning-related documents, including this Scoping Report, will be available for online viewing.

D. Cooperating Agencies/Invitees

Cooperating agency status provides a formal framework for governmental units whether local, state, Tribal, or Federal, to engage in active collaboration with the lead Federal agency to implement the requirements of NEPA. BLM invited Federal, State, local and Tribal entities with

interest and/or special expertise to become cooperating agencies for the Ring of Fire RMP Amendment. The Municipality of Skagway has entered into formal cooperating agency status with BLM.

The State of Alaska responded that the current developed strategy for cooperation and consultation on land use planning efforts was working well for them and that they would like to participate through that manner. As part of the strategy, the State of Alaska and the BLM jointly fund a liaison position. Consolidated scoping comments were received on June 23.

The National Park Service submitted scoping comments but declined formal cooperating agency status.

E. Special Interest Groups, Agencies, and Corporations

In an effort to reach as many groups, agencies, and corporations who may have an interest in the Haines Planning Block for the Ring of Fire RMP Amendment/Supplemental EIS a general letter was sent to the entire original Ring of Fire RMP mailing list. This letter gave a brief explanation of the scope and need for the Amendment, announced the dates, time and locations for the upcoming scoping meetings and invited all stakeholders to participate in scoping by attending a meeting, visiting the website, and making comments to BLM by the deadline of June 24, 2009.

F. Federal and State Government Agencies

All of the agencies listed below received the general scoping letter after the NOI was published inviting them to participate in scoping and attend any of the three scoping meetings. These agencies have had opportunities to provide input during the scoping period, and will have additional opportunities throughout the planning process. A representative of the State of Alaska Department of Natural Resources and the State Planning Liaison attended the Anchorage scoping meeting.

National Park Service
State of Alaska, Coastal Zone Management
State of Alaska, Department of Fish and Game
State of Alaska, Department of Natural Resources
U.S. Fish and Wildlife Service
U.S. Forest Service

G. Adjacent Land Owners and Managers

The following land owners and managers were informed about the Ring of Fire RMP Amendment/Supplemental EIS planning process by mail shortly after the NOI was published. Public announcements about upcoming scoping meetings were made via public radio and ads in the local newspapers in both Haines and Skagway for two weeks prior to both meetings. Adjacent land owners and managers will continue to be kept up-to-date regarding the ongoing planning process to ensure coordination across land management boundaries and to ensure consistency with other planning efforts. Opportunities for input have been provided during the

scoping period and at public meetings. Opportunities for input will continue to be available throughout the planning process. These land owners and managers include:

Glacier Bay National Park and Wilderness
Haines Borough
Klondike National Historic Park
Klukwan, Inc.
Municipality of Skagway
State of Alaska
Tongass National Forest

H. Regional and Village Native Corporations

The Regional Native Corporation, Sealaska Corporation, was informed by mail of the start of the Ring of Fire RMP Amendment/Supplemental EIS project and initial scoping period shortly after the NOI was published in the Federal Register. The Village Native Corporation, Klukwan, Inc. was notified by mail that the Ring of Fire Amendment is taking place and asked to comment. No comments have been received to date, but opportunities to participate in the planning process will be afforded throughout the planning process.

I. Government to Government Consultation

Federally recognized Tribes have a special, unique legal and political relationship with the Government of the United States as defined by the U.S. Constitution, treaties, statutes, court decisions, and executive orders. These definitive authorities also serve as the basis for the Federal Government's obligation to acknowledge the status of Federally-recognized Tribes in Alaska. As such, it is the policy of the BLM to formally consult with Federally-recognized Tribes in Alaska prior to taking action or undertaking activities that will have a substantial, direct effect on the Tribes, their assets, rights, services, or programs. To this end, on April 6, 2009 a letter requesting government-to-government consultation was sent to the only Tribe within the planning area, Chilkat Indian Village Council. Follow up phone calls were made to John Brower with Chilkat Indian Village Council prior to the scoping meetings held in Haines and Skagway. The letter and phone calls invited Tribal representatives and their community members to the scoping meetings. Additionally, BLM offered to come to the community to conduct government-to-government consultation either before or after the Haines public scoping meeting, however Chilkat Indian Village Council did not have time for a meeting. They have not requested Government-to-Government Consultation to date but BLM is available for consultation should Chilkat Indian Village Council request it. Consultation will continue to take place with Federally-recognized traditional governments throughout the planning process in order to identify and consider Tribal concerns with regard to all BLM resource management programs.

J. Community Participation

In addition to their participation in the scheduled scoping meetings, Ring of Fire Amendment Team members have continued communicating with community members from Haines and

Skagway. Individuals from these and other communities within the planning area may provide additional data needed for planning purposes. Chilkat Indian Village Council may provide additional data on Traditional Cultural Properties and subsistence uses. Opportunities for their participation was provided at scoping meetings and during the public comment period, and will continue to be afforded throughout the planning process.

K. BLM Resource Advisory Councils

The BLM Alaska Resource Advisory Council (RAC), which advises the BLM State Director and may make recommendations to the BLM Anchorage Field and District Managers, will provide a broad spectrum of input from various interests. The advisory council was informed at their last face-to-face meeting, February 19 and 20, 2009, of beginning of the Ring of Fire RMP Amendment/Supplemental EIS project. Opportunities for input will continue to be made available at advisory council meetings and throughout the planning process.

L. Media

Use of local media is essential in providing adequate public notice for the varying stages of the planning process. Radio and print media of local and statewide circulation were used to disseminate information concerning the scoping meeting schedule. The BLM has utilized the following radio stations and newspapers for announcements of public scoping meetings:

KHNS Public Radio (Haines, Klukwan, and Skagway)
The Anchorage Daily News
The Skagway News
Chilkat Valley News (Haines, Klukwan)

II. ISSUE AND COMMENT SUMMARY

A. Issues Identified During Scoping

The majority of comments received focused on two main issues, ACEC designation and SRMA designation. Issues about the effects helicopters may have on wildlife populations were used to support or oppose these potential designations and are listed under the topic they relate to. Few comments were received on issues outside of the designations. Those comments are listed below under the heading "Other."

The following issues were raised during the Ring of Fire RMP Amendment scoping period.

1. ACEC Designation – Does area meet criteria for ACEC designation with respect to visual, wildlife and geologic hazard resources?
2. SRMA Designation

B. Summary of Public Comments

A total of 33 comments were received during the public scoping period for the Ring of Fire RMP Amendment. Comments were analyzed in detail and resulted in the identification of planning

issues that will be addressed during the development of the RMP Amendment. An issue is defined as a matter of controversy or dispute over resource management activities or land use that is well defined or topically discrete, and has alternatives between which to decide.

Comments are organized by issue. For a summary of the scoping comments please see Appendix A.

1. ACEC Designation

Nominations for ACEC designation were received on all BLM lands within the Planning Area. The current goat Monitoring and Control Area within the northwest portion of the planning area was further nominated as a Research Natural Area (RNA), a type of ACEC. Most comments only expressed their support for ACEC designations without going into how the lands would meet the Relevance and Importance Criteria BLM uses to evaluate the lands for such designation. A few comments did give specific information that the BLM will consider when making the ACEC determination. One comment in opposition to an ACEC was received. It stated that "there is no compelling reason to nominate these areas as an ACEC."

a. Fish and Wildlife

The majority of comments discussed wildlife and their habitat, particularly goats, as the main reason to create an ACEC. Two comments contended that the "overwhelming majority of naturally occurring goat populations on BLM managed lands nationwide are located in the Haines/Skagway vicinity" thereby making them more than locally significant. Many more comments contend that goat populations around Haines and Skagway are on the decline due to helicopter-supported recreation.

While most comments focused on the direct impacts to certain wildlife, some comments focused on the predator/prey relationship and the effects helicopter supported recreation may have on that balance. As an example, a comment said "The Monitoring and Control Area is also in close proximity to the Alaska Chilkat Bald Eagle Preserve, home to the world's largest gathering of bald eagles. Eagles feed on goat carrion. Therefore, protecting goat populations from impacts associated with helicopter-supported recreation in the vicinity of the Bald Eagle Preserve is relevant, important, and more than locally significant."

Goats were also mentioned as an important species for local hunters as well as an economic species for both guiding services and tourist viewing.

In addition to goats, bears, wolverines and eagles were all mentioned as wildlife affected by helicopter-supported recreation activities in the Planning Area and suggested as meeting the importance criteria for creating an ACEC.

b. Cultural

One comment referred to the importance of goat wool as a resource for traditional blankets made by Native weavers. "The Chilkat Tlingit's are historically recognized as master weavers of Chilkat blankets from mountain goat wool. Creating an ACEC designation to protect the existing Monitoring and Control Area from impacts associated with helicopter-supported

recreation would protect an important resource that has significant historic and cultural value in close proximity to the Chilkat Indian Village of Klukwan."

c. Visual

One comment nominated two ACECs within the planning area because of their "significant scenic…resources." The two significant BLM-managed blocks of land in the Planning Area were the areas nominated.

d. Subsistence

Several comments discussed the importance of goats in the Haines Block as a potential food source for local residents.

2. SRMA Designation

Comments varied on whether or not the SRMA designation in the planning area should be kept. Many comments appeared to not know that a SRMA was already designated in the Ring of Fire RMP and that this Supplement is looking at whether or not to retain the designation.

a. Recreation and Visitor Services

Most of the comments received expressed concern about helicopter-assisted, commercially-guided landing tours and their various effects to wildlife, habitat, and lands and resources including those managed by other agencies. Many comments recommended that permitted commercial helicopter-supported tourism not be allowed on BLM-managed lands in the Planning Area. One comment recommended that "the flight corridor along the Dyea and Chilkoot Trail unit of the park not be used for helicopter assisted sight-seeing, especially if other suitable alternatives can be identified." Another suggested that no helicopter activity should be permitted until baseline studies of helicopters effects on wildlife are done.

Two comments were received in support of the SRMA designation. One comment recommended that BLM "apply SRMA status liberally throughout Haines watersheds whenever and wherever adequate baseline data is insufficient." The other comment is supportive of the existing designation because of the "high level of recreational use in the area" and that it meets the objectives and policies of the State of Alaska's Northern Southeast Area Plan.

b. Comprehensive Trails and Travel Management; Access

One comment was received on OHV use in the planning area. The comment focused on climate change and how it may compound the effects of OHV use on trails in the planning area.

3. Other

a. Water Resources/Water Quality

Several comments were received regarding water resources and quality in the Ring of Fire RMP Amendment planning area. Ensuring compliance with the Clean Water Act (CWA) was mentioned. Water quality degradation of water bodies is a primary concern with special emphasis on public drinking water supplies. One comment expressed concern on the effects climate change may have on water resources. It was recommended that BLM consider the

implications that landscape level change may have on the commitment of water resources and the short and long term health of aquatic systems.

b. Wetlands and Riparian Areas

One comment was received regarding wetlands and riparian areas. In particular compliance with the CWA Section 404 requirements which regulate discharge of dredge or fill material into waters of the U.S., including wetlands and other special aquatic sites.

c. Soil

Soils were mentioned in several comments. One comment acknowledged that the melting of permafrost "is known to cause significant changes in the landscape, from thermokarsts across the landscape slumping into rivers to the expansion and loss of water bodies." This comment encouraged BLM to "include plans for better understanding permafrost and soils and to seek funding for such surveys, and ultimately, to incorporate this information into land management planning." Concern about the potential impacts OHV use may have on the landscape and trails in particular was expressed.

d. Vegetation

Several comments discussed vegetation resources in the planning area. One comment talked about vegetation being affected by climate change and requested that BLM establish migration corridors to "allow species movement and vegetation shifts among islands of suitable habitat."

e. Wilderness Characteristics

One comment suggested that BLM evaluate lands within the Haines Planning Block for potential Wilderness designation.

f. Climate Change

Two comments were received regarding climate change. One comment stated that the "problems of anthropogenic climate change must be addressed at the source if we are to preserve a physically and socially acceptable existence. No new development should be contemplated that does not anticipate zero net emissions."

Another comment suggested that BLM make the issue of climate change a priority and incorporate it into all planning and management strategies. Specifically, the comment stated that the following points of discussions should be incorporated into the Ring of Fire Supplemental EIS:

"1) Provide training on climate change and variability for all resource managers;
2) Consider climate change and variability as a component of long-range management plans and strategies, as well as prioritizing adaptive management;
3) Implement monitoring and assessment programs for impacts to wildlife and wildlife habitats expected to be sensitive to climate change;
4) Educate the public about climate change and its effects on Alaska public lands and resources;
5) Establish and maintain migration corridors that allow species movement and vegetation shifts among islands of suitable habitat;
6) Increase buffer zones around identified critical habitat in order to increase options for species under various climate change scenarios;

7) Protect riparian and wetland communities to promote resilience of these important and susceptible habitats;
8) Make the reduction and elimination of human-induced synergistic impacts a top priority for land and resource management."

g. Minerals

One comment was received regarding mineral resources. It stated that they felt the Ring of Fire RMP provided adequate resource protections and opportunities for access to state lands and mineral resources and development of BLM mineral resources.

h. Land and Realty

One comment was received regarding access to non-federal lands. It requested that this plan ensure that access is provided to non-federal lands through BLM lands.

i. Planning

Comments received about planning had to do with BLM acknowledging and/or adopting plans or management intent of other land owners surrounding BLM lands. One comment pointed out that the State of Alaska had prepared a plan for state-selected lands in the area and requested that BLM adopt the State's management intent for all state-selected lands (nearly all BLM lands in the Haines Block). Another comment requested that BLM manage lands adjacent to the Park Service lands in a manner that would provide a "buffer" to Park lands.

j. Studies and Data Gaps

All comments received regarding the need for studies focused on the affects to goats and other wildlife from helicopter supported activities. The following comment is a representative sample of that belief, "After years of issuing helicopter landing permits without understanding the ramifications to wildlife (particularly goats, brown bears, and wolverine), BLM should prioritize doing the necessary research." Many of the comments went on to identify the monitoring and control area as the "last remaining area" without impacts from helicopter supported commercial activities and how important a control area in determining "what impacts are related to helicopter disturbance vs. background environmental conditions such as heavy snowpack, predation etc."

One comment stated that an "assessment of unique plant species" is needed in the planning area. Because without it "there is no way of ascertaining whether or not the Monitoring and Control Area would also qualify for ACEC designation under BLM 1613.1.11A(3)."

One comment stated that BLM should seek funding for soil surveys in order to better understand permafrost and soils in the planning area.

C. Decisions to be Made

The Ring of Fire RMP Amendment will make the following decisions:

1. Whether to designate any BLM lands in the Haines Planning Block as an Area of Critical Environmental Concern.

2. Whether to keep the Special Recreation Management Area designation within the Haines Block.
3. If the SRMA is retained, determine the Recreation Management Zones and adjust the boundary of the SRMA if necessary.
4. Whether to keep the goat Monitoring and Control Area.
5. Whether the current Required Operating Procedures and Stipulations for Special Recreation Permits is adequate.

D. Issues Raised During Scoping that Will Not Be Addressed

Wilderness Designation and access issues are outside the scope of this planning effort and will not be addressed. Both topics have been addressed in the Ring of Fire RMP.

The BLM will manage the river segments within the planning area which have been determined to be eligible for inclusion in the Wild and Scenic Rivers System to protect the identified Outstanding Remarkable Values pursuant to the guidance found for interim management in BLM Manual 8351.32 Classification and Protection Management. Wild and Scenic River suitability determinations were deferred in the Ring of Fire Approved RMP until the ownership patterns within the planning area are better defined. This effort is outside the scope of this RMP Amendment and will be determined in a future RMP Amendment.

The issue of climate change was recognized and previously addressed in the Ring of Fire RMP in Chapter IV, page 4-135. The Ring of Fire RMP says, "Climate change is both a Reasonably Foreseeable Future Action that can result in additive and synergistic effects with BLM management actions in the Ring of Fire planning area, and can also be affected by management actions taken. Evidence is emerging that climate warming in Alaska can be linked to changes occurring in the structure and function of terrestrial ecosystems throughout the State. Since the 1950s, Alaska has warmed by an average of four degrees Fahrenheit (USEPA 2005). The assessment of the impacts of climate change is in its formative phase, and it is not yet possible to know with confidence the net impact of such change. However, observed changes include warming of permafrost throughout the State, the decrease in area of closed-basin lakes in southcentral Alaska, increased water temperature affecting anadromous fish habitat, and the altering of the ranges of some bird species. Climate change has also been linked to changes in disturbance regimes like fire and insect outbreaks in southcentral Alaska (McGuire 2003).

"Development of oil and gas resources would produce some of the common greenhouse gases, primarily as a result of power requirements and fuel consumption, activities that produce CO. Because climate change must be viewed from a global perspective, the magnitude of the emissions potentially contributed by oil and gas activities in the planning area needs to be viewed in that context. The incremental contribution of greenhouse gases resultant from any of the alternatives in the Ring of Fire PRMP/FEIS would be minor when compared to total greenhouse gas contributions from sources outside of BLM actions in the planning area."

The Ring of Fire RMP Amendment/Supplemental EIS is revisiting administrative decisions. Climate change will be analyzed in this Supplemental EIS only to the extent that it is affected by decisions that are developed in the plan. Proposed recreation decisions and possible effects that

may result in climate change will be viewed in a global perspective, as directed in the Ring of Fire RMP. Considerations of effects from other uses and activities that may or may not result in climate change are outside the scope of this planning effort.

E. Valid Existing Management to Be Carried Forward

In addition to the Ring of Fire RMP that was finalized and signed in March 2008, other management policies, Federal Regulations, and guidance exist for the Ring of Fire RMP Amendment Planning Area. The Ring of Fire RMP Amendment will only amend certain parts of the Ring of Fire RMP including ACEC determinations, Special Recreation Management Area designation, and Monitoring and Control Area designation. The Ring of Fire RMP Amendment will evaluate the current Required Operating Procedures and Stipulations for Special Recreation Permit holders and may revise some or all of them.

III. PLANNING CRITERIA

The planning criteria were included in the RMP Amendment preparation plan.

Planning criteria are based on the applicable laws and regulations providing agency guidance as well as on consultation and coordination with all participating agencies and entities. The criteria are also based on the pertinent information and the professional judgment of the planning team. Planning criteria may be amended, supplemented or changed as the need dictates. The Ring of Fire RMP Amendment Planning Criteria are listed below.

1. Multiple-use by the general public is the primary function of BLM administered lands managed within the Haines planning Block.
2. Decisions will be made for the surface lands administered by the BLM in the Haines Block.
3. Decisions will be limited to those related to recreation (i.e., SRMA/ERMA, special recreation permits), wildlife, travel management, and special designations (i.e., ACECs).
4. Valid existing rights will be protected throughout the planning area.
5. Plans and policies of other federal land managers, land owners and State and local governments in and adjacent to the Haines Block will be considered, and BLM's decisions will be consistent with other land manager's and owner's decisions to the degree reasonably practical within existing laws.
6. The BLM will encourage and participate in collaborative planning and management. BLM will provide opportunity for input from other federal agencies, the State of Alaska, Native governments and Tribal members, local government, adjacent private land owners, local residents and other affected and/or interested parties.
7. Identification, designation, and protection of a Special Recreation Management Area (SRMA) and ACEC (area of critical environmental concern) will receive full consideration.
8. The BLM will comply with all relevant laws, statutes, regulations, manuals, and handbooks.
9. Subsistence uses will be considered and adverse impacts minimized in accordance with Section 810 of ANILCA.

10. Resource management plans prepared by BLM will conform to the Bureau's H-1601-1 Land Use Planning Handbook, Appendix C, Program-Specific and Resource-Specific Decision Guidance and supplemental program guidance manual for ACECs
11. The plan will be consistent with the Alaska Land Health Standards.
12. Designations for Off-Highway Vehicles for all public lands within the planning area will be completed according to the regulations found in 43 CFR 8342.
13. Areas of proposed ACEC designation will meet the criteria found in 43 CFR 1610.7-2.

Alternatives for the use and protection of BLM administered lands will be developed in this planning process. The alternatives will reflect the issues identified and will consider a range of opportunities for:

1. recreation objectives, opportunities, and uses;
2. protection of crucial habitat for priority wildlife species; and
3. SRMA/ERMA reevaluation, designation, and delineation
4. Evaluate for potential special management areas (e.g., RNAs, ACECs)-designate and delineate boundary if applicable

IV. SUMMARY OF FUTURE STEPS IN THE PLANNING PROCESS

1. Analyze the Management Situation. Preparation of an Analysis of the Management Situation (AMS) is the next step in the process after scoping. The AMS describes the current condition and trend of resources in the planning area, current BLM management of those resources, and opportunities to resolve issues identified during scoping. This analysis provides the baseline reference for the development and evaluation of alternatives. The AMS for the Ring of Fire RMP Amendment planning area is being developed and should be completed fall 2009.
2. Formulate Alternatives. Alternatives will be formulated by identifying a range of resource objectives and management practices that will address the issues. A no-action alternative will also be included. Alternatives will be developed for the Ring of Fire RMP Amendment in the fall of 2009.
3. Analyze the Effects of the Alternatives. Once the alternatives are developed, the effects of each alternative on the biological, physical, social, and economic environment will be analyzed in the fall of 2009.
4. Issue the Draft RMP Amendment/Supplemental EIS. This step will begin with the release of the draft RMP Amendment/Supplemental EIS for a 90-day public review period. Public meetings will be scheduled during this time. A notice of availability will be published in the Federal Register in fall 2009. The public comment period will begin with publication in the Federal Register.
5. Issue the Proposed RMP Amendment/Supplemental EIS. Based on the information contained in the draft RMP Amendment/Supplemental EIS and public comment received, the BLM will select a proposed alternative and present it to the public as the Proposed RMP Amendment/Final Supplemental EIS. This step will include the public notices of the document's availability, the distribution of the document, and a 30-day protest period on the final document. The BLM will begin this step in winter 2009/2010.
6. Issue the Record of Decision and Approved RMP Amendment. The BLM expects this step to take place in summer 2010.

Appendix A: Scoping Comment Summary

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
ACEC		I wish to strongly support an Area of Critical Environmental Concern designation for the area "Haines Block."	6, 7, 9	Yes	The lands in the planning block will be evaluated against the ACEC planning criteria and a determination of whether to designate an ACEC will be made.
		Protect the "control" area by not putting it into a SRMA, but rather an ACEC in recognition of the significance of a mt goat resource that is currently protected from helicopter landings.	2, 10, 14, 17, 19, 28, 29	Yes	See response to above comment.
		My review of the data presented indicates that there is no compelling reason to nominate these areas as an ACEC. A.) There are no locally significant qualities that give this area special concern. B.) There are no fragile, sensitive or threatened circumstances. C.) There are no topics warranting protection to satisfy national concerns. D.) No proposed management by the BLM using normal land management practices will cause a threat to human life or property.	5	Yes	The lands in the planning block will be evaluated against the ACEC planning criteria and a determination of whether to designate an ACEC will be made.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
	Scenic	The NPS supports designation of the BLM tract adjacent to Glacier Bay National Park and Preserve as an Area of Critical Environmental Concern (ACEC). This area contains significant scenic value and wildlife resources. ACEC designation would complement the park and provide an additional level of protection to lands adjacent to the park.	33	Yes	Lands within the Planning Block will be evaluated for potential ACEC designation.
		The NPS also recommends that the northern tract be considered for ACEC designation due to its scenic and wildlife resources	33	Yes	See above.
Cultural		Relevance: The Chilkat Tlingits are historically recognized as master weavers of Chilkat blankets from mountain goat wool. Creating an ACEC designation to protect the existing Monitoring and Control Area from impacts associated with helicopter-supported recreation would protect an important resource that has significant historic and cultural value in close proximity to the Chilkat Indian Village of Klukwan. Relevance: The Monitoring and Control Area is also in close proximity to the Alaska Chilkat Bald Eagle Preserve, home to the world's largest gathering of bald eagles. Eagles feed on goat carrion. Therefore, protecting goat populations from impacts associated with helicopter-supported recreation in the vicinity of the Bald Eagle Preserve is relevant, important, and more than locally significant.	16	Yes	Information provided will be taken into account when BLM analyzes areas for potential ACEC designation.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		Relevance: Lastly, and of particularly significant relevance, is that the overwhelming majority of naturally occurring goat populations on BLM managed lands nationwide are located in the Haines/Skagway vicinity. (See LCC's original ACEC nomination letter). Nearly all naturally occurring goat populations on BLM lands in the Lower 48 are gone; therefore, BLM is required to "consider the relative scarcity." (43 U.S.C. 1712 Section 202(c)(6)). This makes the Haines/Skagway goat population a significant wildlife resource that is more than "locally significant."	16, 31		See above.
		Importance: We contend that this resource is more than locally significant due to the decline in naturally occurring goat populations on BLM managed lands elsewhere, and the close proximity of the Monitoring and Control Area to the Alaska Chilkat Bald Eagle Preserve and the weavers of Chilkat Blankets.	16		Information provided will be taken into account when BLM analyzes areas for potential ACEC designation.
		Importance: Haines/Skagway goat populations are currently threatened by acknowledged adverse impacts of "unspecified magnitude" from the increasing use of helicopters on and over goat habitat.	16		Information provided will be taken into account when BLM analyzes areas for potential ACEC designation.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		There is also evidence that declines predicted by these studies are indeed occurring in the Haines/Skagway area: "1999: severe winter weather. Helicopter tourism/glacier landing exposure area suffered significant failure of reproduction and population decline whereas control areas stayed about the same as the previous four years. There is a possibility of cumulative stress from pre-winter tourism activities resulting in enough of a body condition deficit that harsh winter stresses resulted in at least a one season reproductive failure and adult mortality above that experienced in control areas. There appears to be declines or abandonment in use of kidding areas adjacent to landing sites in at least one situation."	16		Information provided will be taken into account when BLM analyzes areas for potential ACEC designation.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		Importance Criteria: Bald eagles are predators that rely on goat carrion and young lambs as a food source. Successful eagle nesting "is dependent, in part on available carrion and high protein intake for successful breeding and hatching success." (Id). Healthy goat populations are especially important for nesting eagles in the Haines area because of the proximity of BLM lands to the Alaska Chilkat Bald Eagle Preserve (CBEP), home to the world's largest gathering of bald eagles, with a high density of nesting eagles. Again, the proximity of the CBEP to the Monitoring and Control Area, the national significance of the CBEP, and the dependence of eagles on carrion, make the goat resource more than locally significant.	16		Information provided will be taken into account when BLM analyzes areas for potential ACEC designation.
ACEC – RNA		Establish a RNA to do the long-term studies needed to determine impacts to the goat and other wildlife	2, 12, 17	Yes	The lands in the planning block will be evaluated against the ACEC planning criteria and a determination of whether to designate an ACEC will be made.
		The BLM lands located North of Klukwan to the Canadian Border need to be managed as an NRA (sic).	3	Yes	See above
		I further support including the goat monitoring area in a Research Natural Area (RNA) designation.	7, 24, 25, 27	Yes	The lands in the planning block will be evaluated against the ACEC planning criteria and a determination of whether to designate an ACEC will be made.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		This (RNA) designation would increase the likelihood of obtaining funding for research on the obvious impacts of landing large noise producing machines in the few remote areas the mountain goats still call home.	7	No	The likelihood of obtaining funding is not a criteria used in designating an ACEC/RNA. BLM is mandated to use the criteria set forth in 43 CFR 1610.7-2 Designation of areas of critical environmental concern.
		Establishing an Area of Critical Environmental Concern/Research Natural Area (ACEC/RNA) would be the obvious first step (to understanding ramifications to wildlife from helicopter activity).	11, 17	No	Establishment of an ACEC/RNA does not necessarily mean that the studies needed to determine ramification to wildlife from helicopter activity would be funded.
		The existing Monitoring and Control Area needs to be retained and placed in an Area of Critical Environmental Concern and managed as a Research Natural Area. My reasons for this action are as follow. The existing Monitoring and Control Area is the only significant remaining goat habitat in the Haines/Skagway area currently NOT impacted by helicopter landings. BLM has an obligation to protect it.	11, 12, 13, 15, 17, 20, 21, 22, 23	Yes	The lands in the planning block will be evaluated against the ACEC planning criteria and a determination of whether to designate an ACEC will be made.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		The current Monitoring and Control Area should be designated an ACEC and managed as a RNA… It is the perfect study area because near-by goat populations have been seasonally disturbed in varying intensities, by both summer and winter helicopter use. Since BLM continues to issue helicopter landing permits, the agency has a responsibility to determine impacts caused as a result of issuing permits. Opportunities for education are also a natural fit for the Haines Area. The Alaska Chilkat Bald Eagle Preserve has a mandate to provide continued opportunities for research and education. In addition to studying eagles in Haines, mountain goat research could occur as a result of creating a RNA. Closely situated areas created to protect goats and eagles would offer interesting and creative opportunities for public education.	16	Yes	The lands in the planning block will be evaluated against the ACEC planning criteria and a determination of whether to designate an ACEC will be made.
	Habitat	The goat habitat is critical.	6	Yes	BLM will consider the amount and location of goat habitat during this Amendment and with any future Special Recreation Permit Applications.
		The public lands of the Upper Lynn Canal Area are both heavily used by helicopter-based recreation firms/users and are perhaps some of North America's finest habitat for mountain goats.	3	Yes	BLM will consider the amount and location of goat habitat during this Amendment and with any future Special Recreation Permit Applications.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		The Mountain Goat Monitoring and Control Area is an extremely important public lands area for the protection of habitat for mountain goats and other wildlife including wolverines and brown bears.	20	Yes	BLM is currently abiding by the Monitoring and Control Area. A determination of whether or not to keep it will be made through this planning effort.
		The mountains of Upper Lynn Canal contain some of the worlds premium mountain goat habitat.	22	Yes	Goat habitat will be taken into consideration during this amendment.
		The BLM has an obligation to enhance the habitat and populations of the Haines/Skagway goats; nationally, mountain goat populations are in decline due to a loss of habitat and increased human disturbance.1 1 1997 USDA Helicopter Landings in Wilderness EIS at 4-19	26	Yes	BLM will consider the amount and location of goat habitat during this Amendment and with any future Special Recreation Permit Applications.
		Unfortunately for the local mountain goat population they have little option in their choice of home and habitat. There is much debate about the acceptable level of noise pollution mountain goats can tolerate. This question remains unresolved even though a Monitoring and Control Area was established in 2002 to better understand mountain goat adaptability and limit landings in the Lynn Canal area.	28	Yes	BLM will consider the amount and location of goat habitat during this Amendment and with any future Special Recreation Permit Applications.
Land, Land Use, and Access		Because ADNR Area Plans establish management intent for state-selected lands, we request that BLM adopt the management intent for state-selected lands from the area plans for these areas.	18	Yes	Noted.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		If there are any BLM lands adjacent to state land that are not state-selected, appropriate access should be maintained through these federal areas	18	No	Access is outside the scope of this planning effort.
		While helicopter-assisted recreation is increasing in our area, there are ample areas where these activities are permitted. We don't need to create more at the expense of advancing knowledge.	29	Yes	BLM is currently abiding by the Monitoring and Control Area. A determination of whether or not to keep it will be made through this planning effort.
Research/Monitoring	Data Gaps	A long term mngt plan must be based on detailed biological, physiological and economic aspects of each herd in each watershed of Haines.	4	Yes	Research needs will be identified during this planning effort.
		Not enough has been done to assess the effect of helicopters on goat habitat.	10	Yes	BLM will assess what is known about the effects of helicopters on goat habitat.
		Studies of long and short-term impacts to goats from helicopter activity are long overdue. After years of issuing helicopter landing permits without understanding the ramifications to wildlife (particularily goats, brown bears and wolverine), BLM should prioritize doing the necessary research.	11, 12, 23	Yes	Research needs will be identified during this planning effort.
		there is very little long term reliable info on what the effects of helicopters have on goats. This area seems to be one of the few places that information could be attained and it would be irresponsible to change that.	15	Yes	Research needs will be identified during this planning effort and a determination of whether or not to keep the monitoring and control area will be made.
		We have incrementally permitted more and more helicopter tours without having a baseline of protection or understanding of limits needed to protect goats and goat habitat.	21	Yes	Research needs will be identified during this planning effort.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		Without a control, it is virtually impossible to say what impacts are related to helicopter disturbance vs backgound environmental conditions such as heavy snowpack, predation etc. Such knowledge is essential to understanding where and when it may be appropriate to allow helicopter usage or similar disturbances.	22	Yes	BLM will make a decision on whether or not to keep the monitoring and control area through this planning process.
		Studies have been done to quantify the behavioral response of mountain goats to helicopter traffic, but we need studies that go beyond the temporary observation of a limited number of goats. While behavioral studies provide data about the immediate impact of helicopters, what is really needed are studies on how helicopter traffic affects the long-term survivability of mountain goat populations.	27	Yes	BLM will consider all known data during the planning process.
		The area contains glaciated landforms and to date there has been no assessment of unique plant species. Because no assessment has been done there is no way of ascertaining whether or not the Monitoring and Control Area would also qualify for ACEC designation under BLM 1613.1.11A(3).	16	Yes	All ACEC criteria will be considered.
Monitoring and Control Area		BLM's priority must include securing areas that are unused by helicopter recreationists, so that one day studies can be done to assess impacts. BLM and other state agencies will never be able to assess impacts to m. goats if it does not have sizable "control" area.	3	Yes	BLM will make a decision on whether or not to keep the monitoring and control area through this planning process.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		If you doubt that mountain goats are impacted by the unnecessary landing of helicopters in their habitat then it is even more vitally necessary for the mountain goat Monitoring area to be protected by enclosing it in an area of critical environmental concern. The goat monitoring area should absolutely not be included in the SRMA if the SRMA is to be retained. It must be kept off limits to any helicopter landings in all seasons.	7	Yes	BLM will make a decision on whether or not to keep the monitoring and control area through this planning process.
		It takes a non-impacted control area to study these effects and I see it as a mistake to give up the one already in place that can be used in future years and future studies.	15	Yes	BLM will make a decision on whether or not to keep the monitoring and control area through this planning process.
Recreation		No helicopter activity should be permitted. Baseline studies for a period of years are needed now. Without these, no consideration of disruption by helicopters should be allowed.	6	Yes	
		I support winter heli ski industry in Haines – but not at the expense (impact, stress, disturbance, etc.) of these extremely valuable mtn goat herds.	4	Yes	BLM will re-evaluate the terms and conditions it puts on all recreation permits as part of this planning effort.
		Please apply SRMA status liberally throughout Haines watersheds whenever and wherever adequate baseline data is insufficient.	4	Yes	
		In addition to summer helicopter tours on BLM lands from Skagway, increasing levels of heli-skiing activities are currently permitted on BLM and state lands in the Haines area.	16		

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		The State [of Alaska] is supportive of the existing SRMA designation because of the high level of recreational use in the area and the objectives and policies of the Northern Southeast Area Plan.	18	Yes	BLM will re-evaluate the SRMA designation in the Haines Block and will take into consideration how surrounding non-BLM lands are managed.
		The NPS is concerned about helicopter-assisted, commercially-guided landing tours adjacent to and crossing the park's boundary. NPS recommends that permitted commercial helicopter use be prohibited in this area (GLBA).	33	Yes	Noted.
		Because of the potential for impacts to park resources and values the NPS recommends that the flight corridor along the Dyea and Chilkoot Trail unit of the park not be used for helicopter assisted sightseeing, especially if other suitable alternatives can be identified	33	Yes	Noted.
Wildlife		Due to elevations of BLM lands, my principal concern for management plan by BLM concerns proper protection and management of the mountain goat populations in the Haines region.	4	Yes	Noted.
		These (mtn goat) populations are World Class.	4	Yes	
		Helicopter recreation will impact the goat population and should not be allowed to increase in any way.	7	Yes	
		Recreational activities in this block would certainly impact wildlife populations negatively.	9	Yes	

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		In other parts of the world, it's become clear that, over time, stress from helicopter tours has had negative impacts on wildlife, for example contributing to the endangerment of mountain caribou in British Columbia.	21	Yes	BLM will consider existing data regarding effects that helicopters have on wildlife in the Haines Block.
		Research and monitoring are necessary because Haines/Skagway goat populations are currently threatened by acknowledged adverse impacts of "unspecified magnitude" form the increasing use of helicopters inside and over goat habitat. Specific scientific concerns about impacts to mountain goats include: displacement from prime habitat, acute or chronic reduction in foraging efficiency resulting in nutritional deficiency, reproductive failure, and increased vulnerability to predation. (1995 BLM and USDA EA for Helicopter Landing Toursin the Skagway and Haines Area, pages 3-12 and 3-13).	31	Yes	See above.
		Wolverine populations may also be at risk: "Wolverine natal dens are typically located on the specific kind of areas proposed for heliskiing. Wolverine populations are never considered abundant and natal dens are sparsely distributed." (Id).	16	Yes	See above.
Miscellaneous		suspend all existing activity that may impact wildlife population until you acquire the needed means (to conduct studies on impacts).	19		

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		require user groups to pay for the necessary comprehensive research and monitoring, analyze the results and then permit activities that pose no threat the continued health and welfare to species and habitat of concern.	19, 20		
		These herds are enjoyed by recreationists and hunters alike. They help to support a valuable guiding industry, and though not agency listed as a subsistence specie, goats are certainly utilized as such by a number of local area hunters.	22	Yes	
		We and our neighbors depend on mountain goats as a potential food source.	29		
Climate Change		We recommend that the BLM take this opportunity to identify and remedy the inadequacies through this SEIS process for recreation, wildlife, travel, habitat management and ACEC and SRMA designations – all within the scale of review for the SEIS. (In regards to Climate Change).	26		
		We encourage the SEIS to include plans for better understanding permafrost and soils and to seek funding for such surveys, and ultimately, to incorporate this information into land management planning.	26	No	Understanding permafrost and soils is outside the scope of this SEIS. BLM is in the process of obtaining funding for soil surveys outside of the planning area and agrees with the importance of such studies.

Resource Area	Issues	Comment	#	Addressed in EIS?	Response (does not support or refute comment)
		The BLM needs to consider the impacts of climate change on subsistence resources and practices. Changes in habitat within and beyond BLM managed lands are predicted to stress all of the wildlife, waterfowl and fish populations that serve as subsistence resources. Some populations may increase in abundance within the planning area while others may later their migration and be unavailable. We encourage the BLM to consider Wilderness designation and National Wild and Scenic River Status as tools which can help wildlife populations adapt in a less disturbed environment during climate change while insuring subsistence access to needed resources.	26	No	There is no indication of changes to subsistence in the planning area. BLM will continue to monitor the effects climate change may have on subsistence issues and be responsive when they do arise. Wilderness designation and National Wild and Scenic River Status are outside the scope of this planning effort.
		The problems of anthropogenic climate change must be addressed at the source if we are to preserve a physically and socially acceptable existence. No new development should be contemplated that does not anticipate zero net emissions.	30		

COMMENT NUMBER KEY

#	Name	Address
1	Jean Public	Florham Park, NJ
2	Nancy Berland	Haines, AK
3	Burl Sheldon	Haines, AK
4	Ray Staska	Haines, AK
5	Nicholas Van Wyck	Anchorage, AK
6	Peter Goll	Haines, AK
7	Sherrie Goll	Haines, AK
8	JoAnn Ross Cunningham	Haines, AK
9	Laurie Dadourian	Haines, AK
10	Bob Andrews	Haines, AK
11	Bruce Baker	Auke Bay, AK
12	Tim McDonough	Haines, AK
13	Ann Myren	Haines, AK
14	Ron Jackson	Haines, AK
15	Mardell Gunn	Haines, AK
16	Lynn Canal Conservation	Haines, AK
17	Irene Alexakos	Haines, AK
18	State of Alaska	Anchorage, AK
19	Kip Kermoian	Haines, AK
20	Patricia Kermoian	Haines, AK
21	Sue Libenson	Haines, AK
22	Mike Van Note	Haines, AK
23	Thom Ely	Haines, AK
24	Eric Holle	via email, no address
25	Katey Palmer	Haines, AK
26	Alaska Wilderness League	Anchorage, AK

#	Name	Address
27	Carolyn Weishahn	Haines, AK
28	Ben Kirkpatrick	Haines, AK
29	The Zeiger Family	Haines, AK
30	James M. Byrnes	Eagle River, AK
31	The Wilderness Socitey	Anchorage, AK
	Sierra Club Alaska Chapter	
	Defenders of Wildlife	
	Alaska Quiet Rights Coalition	
	Alaska Wildlife Alliance	
	Alaska Wilderness League	
	Alaska Center for the Environment	
	Southeast Alaska Conservation Council	
32	U.S. Environmental Protection Agency	Seattle, WA
33	National Park Service	Anchorage, AK