

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 III 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 in each volume 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.

- **Squirrel River Special Recreation Management Area:** The boundary of the Squirrel River Special Recreation Management Area was adjusted to exclude some lands conveyed to the State in 2006. Additional interim management actions were added including requiring that air taxi's and transporters using BLM-managed land obtain a commercial permit. A Recreation Opportunity Spectrum (ROS) was developed for the Squirrel River (Table 2-12). These changes were

made in response to public and internal comment, and recent changes in land ownership and selection priorities.

- **Extensive Recreation Management Area:** A Recreation Opportunity Spectrum table was developed for the Extensive Recreation Management Area (Table 2-13). This ROS will provide management goals for the extensive recreation management area, including management controls on commercial use. These changes were made in response to public and internal comment.
- **Mount Osborn:** The Proposed Mount Osborn Research Natural Area was changed to the Mount Osborn Area of Environmental Concern (ACEC). The boundary was adjusted to exclude high-priority state selected lands and to include two additional lakes that support Kigluaik Arctic char (Map 2-21). The proposed mineral withdrawal of the Mount Osborn area was not carried forward into the preferred alternative. Instead four new ROPs were developed to address protection of Kigluaik Arctic char habitat (Appendix A, section B (4) “Special Status Species”). These changes were made in response to both internal comments and public comments.
- **Western Arctic Caribou ACEC:** The boundary was adjusted to exclude lands conveyed to the State in 2006 and other high-priority selected lands that will not remain in BLM ownership over the long-term (Map 2-21). The resulting ACEC incorporates caribou insect relief habitat but not much of the calving habitat. This change was made in response to recent changes in land ownership and selection priorities.
- **Fluid Leasable Minerals:** The recommendation to retain the no surface occupancy setback on eight rivers identified under PLO 6477 was removed. Instead of retaining the PLO, ten high value rivers would be designated as no surface occupancy through the RMP (Map 2-8 and Table 2-8). For the most part, these are the same rivers included as no surface occupancy in the Draft RMP/EIS except, Boston Creek and Fish River were dropped. Most of the Fish River and Boston Creek are no longer under BLM management. The criteria for selecting these key rivers may be found in Appendix H. These changes were made in response to internal comment and changes in land ownership.
- **Solid Leasable Minerals:** The proposed closure of the northern Nulato Hills to solid leasable mineral exploration and prospecting was dropped. The closure was replaced with ROP FW-3e (Appendix A) which would limit exploration and prospecting in this same area. The recommendation to retain PLO 6477 on eight rivers was removed. Instead of retaining the PLO, ROP FW-7a would apply to any proposal for solid leasable mineral exploration or prospecting on ten key rivers (Map H-1, Table 2-9, Appendix A). These changes were made in response to internal comments and changes in land ownership.
- **Locatable mineral withdrawals on rivers:** Proposed locatable mineral withdrawals on the Ungalik River, Kivalina River, and Boston Creek were dropped. Withdrawals were replaced with ROP FW-7a (Appendix A). These changes were made in response to both internal and public comments and also changes in land ownership.
- **Locatable mineral withdrawal – Mount Osborn:** The mineral withdrawal of the Mount Osborn area was not carried forward into the preferred alternative.

Instead four new ROPs were developed to address protection of Kigluaik Arctic char habitat (Appendix A, section B (4) “Special Status Species”). This change was made in response to both public and internal comment.

- **Communication Site Rights-of-Way:** The limitation on the number of communication site rights-of-way in the Kigluaik Mountains was removed. Applications for communication sites in the Kigluaik Mountains will be considered on a case-by-case basis (Chapter II, section B (2)(g) “Lands and Realty Actions”). This change was made in response to public comment.
- **FLPMA and Recreation and Public Purposes (R&PP) leases:** Leasing under FLPMA and R&PP authorities would be allowed in designated ACECs on a case-by-case basis outlined in Chapter II, Table 2-19 and section B (2)(g) “Lands and Realty Actions” versus prohibiting leasing in ACECs. This change was made based on internal comments.
- **Occupancy permits:** The provision to not authorize occupancy permits within designated ACECs was removed from the preferred alternative based on both public and internal comment. Occupancy permits would be considered in ACECs on a case-by-case basis as outlined in Chapter II, Table 2-19.
- **Lands for Retention:** The lands identified for retention on Map 2-18 were modified to leave a buffer along the Nome road system whereby BLM lands adjacent to the road would be available for disposal under various authorities.
- **FLPMA sales:** Sales would be allowed in areas not identified for retention on Map 2-18 if consistent with the disposal criteria in FLPMA as outlined in Chapter II, section B (2)(g) “Lands and Realty Actions”.
- **Required Operating Procedures:** Several new ROPs were developed in response to public comment (Appendix A). These include ROP Water-3g, SS-4a through -4d, FW -7a, and FW-3e. ROP FW-2h, allowing water withdrawal from lakes, was dropped based on internal review. As were ROP MLA-2a and MLA-2b regarding mining law administration. These two ROPs were not necessary as they reiterated federal regulations under 43 CFR 3809. These changes were made based on both public and internal comments. Three subsistence ROPs were combined into a single ROP entitled Sub-1a. Cultural resources ROP C-1a was determined to be unnecessary based on internal review. ROP FW-6a was revised to reflect updated raptor protection standards for powerlines. Other ROPs were reworded or reformatted to clarify. The introductory language in Appendix A was revised and reorganized to clarify and ensure consistency with regulations.
- **Oil and gas leasing stipulations:** Two oil and gas leasing stipulations from Table A-2 were converted to ROPs based on internal review. These requirements are now covered through ROP Soils-1g and Water-5e (Appendix A).

2. Other changes that required supplementary information added to the Final RMP/EIS, including minor additions to Chapter 3 or Chapter 4 analysis:

- **Access:** The legend on Map 3-32 was reworded to clarify that RS-2477 routes as identified in the State's data base may not exist on the ground and/or may not be accurately mapped. The legend also clarifies that this map is only a representation of trails that may exist and their general location. It does not mean that BLM endorses any particular route shown on this map. This change was made based on internal comment.
- **Air:** Additional text has been added to Chapter III, section B (1) "Air Quality", to clarify how average annual temperature was determined.
- **Areas of Critical Environmental Concern:** Additional text was added to Chapter III, section D (1)(a)(3)(b) "Inglutalik, Ungalik, and Shaktoolik Watersheds" to clarify that these areas are also important winter habitat for caribou. This was in response to public concern that the importance of caribou habitat in the southern Nulato Hills was recognized.
- **Assumptions for Analysis:** Based on public comment, the assumptions for analysis were clarified in Chapter IV, section A (2)(a) "General Assumptions" regarding climate change, the life of the RMP, and selected lands.
- **Assumptions for Analysis:** Based on public comment, the assumptions for analysis were clarified in Chapter IV, section (A)(2) "Analysis Assumptions" regarding wildlife, fire management, cultural and paleontological resources, forest products, and coal leasing.
- **Climate change:** Additional analysis has been added in Chapter IV under various resources that may be affected by climate change and under the cumulative case. This information was added to response to public comments.
- **Climate change:** An additional section on climate change has been added to Chapter III, section B (2) "Climate Change". This information was added in response to public comment.
- **Cumulative Impacts:** Chapter IV, section G (1) "Activities Considered in the Cumulative Case" was revised to add additional reasonably foreseeable actions and to update ongoing activities. These changes were made based on public comment.
- **Cumulative Impacts:** A section on climate change has been added to Chapter IV, section G "Cumulative Impacts". The discussion of cumulative impacts to wildlife and special status species has been expanded. These changes were made in response to public and internal comment.
- **Cumulative Impacts:** On May 14, 2007 a decision was made to stop the planning effort for South NPR-A. South NPR-A planning was deleted from the activities considered in the cumulative case and the impact analysis was revised.

- **Fire Management:** Additional text was added to Chapter III, section B (9)(c) “Fire Regimes” describing fire regime condition class modeling for the planning area. The results of this modeling were not available when the Draft RMP/EIS was published.
- **Fish:** Additional discussion on Essential fish habitat was added to chapters II, III and Chapter IV. This information was added in response to internal comment.
- **Fish:** Additional impact analysis was added to chapter IV section B (3)(1) “Fish”.
- **Fish:** Additional text was added to Chapter III, section B (8)(b)(2) “BLM Sensitive Species” regarding Kigluaik Arctic char.
- **Fish:** Text was added to Chapter III section B (7)(a)(3) “Factors Affecting Fish Habitat and Production” describing the 300-foot riparian reserve concept. This was done in response to public comment.
- **Impact Analysis:** The impact analysis under Alternative D for all programs was revised to reflect changes to the preferred alternative in the Proposed RMP/EIS. These changes are outlined above under section B (1) “Changes to the Draft’s preferred alternative that are now a part of the Final’s Proposed RMP (Alternative D).”
- **Hazardous Materials:** Based on public input, mercury was added to Table 3-36 as a hazardous material associated with mining.
- **Impacts to other lands:** Additional analysis of impacts to lands not managed by BLM was added to Chapter IV “Environmental Consequences”.
- **Lands and Realty:** Additional discussion on the process for modification or revocation of ANCSA 17(d)(1) withdrawals was added to Chapter III, section C (7)(c)(2) “Withdrawals”. This was done in response to public confusion about the withdrawal process. Other minor editorial changes were also made to this section.
- **Lands and Realty:** Chapter III, section C (7)(b)(2) “R&PP Sales” was revised to note that there is one pending R&PP sale in Point Lay. This was done in response to internal comment.
- **Lands and Realty:** The Table entitled “Withdrawals for Other Agencies Excluding ANILCA” was removed from Chapter III. Table 2-18 was added to Chapter II.
- **Leasable Minerals:** Additional information on shale-hosted natural gas at the Red Dog mine was added to Chapter III, section C (3)(a)(4) “Coalbed Natural Gas” based on public comment.
- **Leasable Minerals:** Additional text was added to Chapter III, section C (3)(a)(1) “Oil and Gas” describing 19 suspended oil and gas lease offers in the planning area. This information was inadvertently left out of the Draft RMP/EIS.
- **Leasable Minerals:** Additional text was added to Chapter III, section C (3)(a)(1)(a) better describing past oil and gas exploration activities.
- **Leasable Minerals:** Based on internal comment additional description of a coal district was added to Chapter III, section C (3)(a)(2) “Coal”.
- **Leasable Minerals:** Based on public comment, additional discussion of the Cape Beaufort, Lisburne, Kukpowruk, and Chicago Creek coal fields was added to Chapter III, section C (3)(a)(2)(a) “History and Development”.

- **Livestock grazing:** Additional text was added to Chapter III, section C (2) “Livestock Grazing” and Chapter IV, section C (2) “Livestock Grazing” regarding the relationship between livestock grazing and climate change. This was added in response to public comment.
- **Locatable Minerals:** Additional text was added to Chapter III, section C (3)(b)(4) “Recent Activity” to better describe the data shown in Figures 3-5 and 3-6. This was done in response to public comment.
- **Locatable Minerals:** Chapter III, section C (3)(b)(5)(g)(1) “Red Dog HLMP Area” was revised to clarify the discussion on the Red Dog High Locatable Mineral Potential Area in response to public comment.
- **Research Natural Areas:** Regulations applicable to Research Natural Areas was added to the discussion in Chapter III, section D (1)(b)(1) “Background” in response to public comment.
- **ROPs and Stips:** A new Required Operating Procedure ROP-Water-3g (page A-11) has been added to provide additional protection to riparian habitat. This was added in response to public comment.
- **ROPs and stips:** Additional text was added to Appendix A describing how the ROPs and stips interact with requirements of other agencies and governments. This was in response to public comment.
- **ROPs and stips:** Additional text was added to Appendix A describing how the ROPs and oil and gas leasing stipulations were developed and how they are enforced (pp A-5 and A-6). These changes were in response to public comment.
- **ROPs and Stips:** Required Operating Procedure ROP-Wildlife -3c was modified to note that it would not apply to Alternative B. This statement was incorrectly left out of the Draft RMP/EIS.
- **ROPs and Stips:** Required Operating Procedure ROP-Wildlife -3d was modified to apply only to aircraft use associated with permitted activities.
- **Short-term Use vs. Long-Term Productivity:** Section J was added to Chapter IV, discussing short-term uses versus long-term productivity of resources.
- **Soil:** Additional text was added to Chapter III section B(4), “Soil Resources”, to clarify development of thermokarsts terrain as a result of climate change.
- **Special Status Species:** A section on polar bears was added to Chapter III, section B (8)(c)(1) “Threatened, Endangered, and Candidate Species” in response to public comment and FWS December 2006 proposal to list polar bears as threatened under the Endangered Species Act. Additional information was added to Chapter IV on potential impacts to polar bears (pp 4-100 to 4-107). This was added in response to public comment.
- **Special Status Species:** Based on internal comment, a description of State laws regarding state listed species was added to Chapter III, section B (8) “Special Status Species”.
- **Special Status Species:** Based on internal comment, additional text was added to Chapter III, section B (8)(c)(2) “BLM Sensitive Species” describing the Cooperative Agreement for yellow-billed loon. This section was also updated to note which BLM sensitive species also are listed by the State of Alaska as Species of Special Concern.

- **Special Status Species:** Based on public comment additional text was added to Chapter III, section B (8)(c)(1)(d) “Kittlitz’s Murrelet” to better describe the distribution, habitat and threats to Kittlitz’s Murrelet.
- **Special Status Species:** Chapter III, section B(8)(a)(2) “BLM Sensitive Species” was revised to add a description of an additional plant species, Muir’s fleabane, that was inadvertently left out of the Draft RMP/EIS.
- **Travel Management:** Additional description of the Red Dog Mine road was added to Chapter III, section C (5)(a)(1) “Roads” in response to internal comment.
- **Travel Management:** The discussion of R.S. 2477 trails in Chapter III, section C (5)(a)(2) “Trails, R.S. 2477 Routes, and 17(b) Easements” was revised in response to internal comment.
- **Wild and Scenic Rivers:** Based on public input, Chapter III, section D (3)(b)(1)(d) “Suitability” was revised to note that the State of Alaska does not support designation of any wild and scenic rivers in the planning area.
- **Wild and Scenic Rivers:** Based on public input, moose habitat was added to Table 3-35 as an outstandingly remarkable value present in the Agiapuk River.
- **Wild and Scenic Rivers:** Chapter III, section D (3)(c) “Previous Study of the Squirrel River” was revised to note the tentative appropriate classification of the eleven river segments for management as wild river areas.
- **Wildlife:** Chapter IV. section (B)(3)(b) “Wildlife” was expanded to include additional analysis or clarification of impacts based on both public and internal comment. This included additional analysis of impacts from special designations, global climate change, and leasable minerals.

3. Minor changes that required only editorial change.

- **Acronyms:** Several more acronyms were added to the acronym list.
- **Boundary correction:** An error in the planning area boundary was discovered after publication of the Draft RMP/EIS. The planning area boundary shown in the Draft RMP/EIS overlapped slightly with the Central Yukon Planning Area in the vicinity of Koyukuk National Wildlife Refuge. The maps in the Proposed RMP/Final EIS were revised to correct this error. The acreage involved in this change was small.
- **Editorial:** The preferred Alternative described in Table B-2 for the WACH ACEC was corrected to be consistent with Table 2-10 in response to public comment.
- **Editorial:** Chapter III, section B (5) “Water Resources” was changed to clarify text on groundwater.
- **Figures:** Figures 3-3 and 3-4 were reformatted to make the data more understandable. Additional text was also added to better describe the figures.
- **Land Status:** Land status was updated to reflect landownership changes between the Draft RMP/EIS and September 2006. This resulted in changes on the base land status layer displayed on maps, in numerous tables where

acreages were displayed and in the calculated acreage for some areas. New acreage figures were calculated for Alternative D, but not for Alternatives A-C.

- **Leasable Minerals:** Square miles were converted to acreage in Chapter III, section C (3)(a)(1)(c) “Development Potential.” Other minor editorial changes were also made in this section.
- **Leasable Minerals:** Terminology was updated in Chapter II, section B (2)(c)(1) “Leasable Minerals.” For example the category “open to leasing subject to major constraints” was changed to “open to leasing subject to no surface occupancy.”
- **Leasable Minerals:** Chapter IV, section C (3)(a) “Leasable Minerals” was edited for clarification.
- **Livestock grazing:** Chapter II, section B (2)(b) “Livestock Grazing” was revised slightly to clarify that grazing permits would be considered on a case-by-case basis in those areas open to livestock grazing.
- **Maps:** Pilgrim Hot Springs Known Geothermal Resource Area (KGRA) was displayed on Map 1-2 based on public comment.
- **Maps:** The legends of subsistence use maps 3-37 through 3-45 were changed to reflect the date of data depicted on the maps in response to public comment.
- **Maps:** Maps 2-22 and 3-35 were revised to show the correct location of the Nilik River.
- **Travel Management:** Chapter IV, section C (5) “Travel Management/OHV” was edited for clarification.
- **Visual Resources:** Chapter IV, section B (8) “Visual Resources” was reorganized to be more similar to the other sections.
- **Wilderness Characteristics:** Chapter IV, section B (9) “Wilderness Characteristics” was reorganized to be more similar to the other sections and edited for clarification.
- **Wild and Scenic Rivers:** Table 3-35 was expanded to include additional information about eligible rivers.

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

4. Summary of additional maps, tables, and appendices.

- **New maps added to the Proposed RMP/Final EIS.** Map 1-2, a general relief and features map, was added to Chapter I. Maps 2-23 through 2-26 summarize major management decisions (minerals management, special areas, and OHV designations) for Alternative C and D. Map 3-46 shows fall migration routes for the WACH. Map H-1 shows the ten rivers where special management would apply. Map H-1 was added as additional information not available for the Draft RMP/EIS. All other new maps were added in response to public comment.
- **New Tables added to the Proposed RMP/Final EIS.** Table 2-12 shows Recreation Opportunity Spectrum for the Squirrel River. Table 2-13 shows

Recreation Opportunity Spectrum for the Extensive Recreation Management Area. Table J-2 in Appendix J shows public comment and BLM's response to the comments. Table 2-18 was added to Chapter II showing the recommendations for withdrawals by other agencies. This table was added in response to internal comment.

- **New Appendices:** Appendix F includes the Master Memorandum of Understanding (MMOU) between the Alaska Department of Fish & Game and the BLM. Appendix G includes the State of Alaska's Fact Sheet on Generally Allowed Uses. Appendix H outlines the criteria and rationale for selecting the ten key rivers affected by Required Operating Procedure FW-7a. Appendix I shows the recreation and visitor services market analysis for the Kobuk Seward-Peninsula planning area. Appendix J summarizes public comment and BLM's response to the comments.

