Environmental Assessment
Alaska Native Vietnam-era Veterans Land Allotment Program

DOI-BLM-AK-0000-2021-0005-EA

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Alaska State Office

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Acronyms and Abbreviations

ACHP	Advisory Council on Historic Preservation
ADF&G	Alaska Department of Fish and Game
AHRS	Alaska Heritage Resources Survey
ANILCA	Alaska National Interest Lands Conservation Act
ANCSA	Alaska Native Claims Settlement Act
ATV	all-terrain vehicle
ACEC	Area of Critical Environmental Concern
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
CGP	construction general permit
DEC	Department of Environmental Conservation
DOI	Department of the Interior
DOE	determination of eligibility
ESA	Endangered Species Act
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
EFH	Essential Fish Habitat
EO	Executive Order
GIS	Geographic Information Systems
GUA	Guide Use Areas
IM	Instruction Memorandum
MMPA	Marine Mammal Protection Act
MBTA	Migratory Bird Treaty Act of 1918
MCH	Mulchatna caribou herd
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NHD	National Hydrography Dataset
NMFS	National Marine Fisheries Service
NLI	Not Likely Present or Impacted
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OHV	Off-Highway Vehicle
PRPA	Paleontological Resources Protection Act
PFYC	Potential Fossil Yield Classification System
PI	Potentially Present or Impacted
PA	Programmatic Agreement
PLO	Public Land Order
RMP	Resource Management Plan
ROD	Record of Decision
RMIS	Recreation Management Information System
RSC	Recreational setting characteristics
ROW	Right-of-way
SO	Secretarial Order

SRMA	Special Recreation Management Area
SRP	Special Recreation Permit
SSS	Special Status Species
SHPO	State Historic Preservation Office
SWPPP	Storm Water Pollution Prevention Plan
U.S.C.	United States Code
USFWS	U.S. Fish and Wildlife Service
WACH	Western Arctic caribou herd
WSR	Wild and Scenic Rivers

1 Introduction

1.1 Summary of Proposed Project

Section 1119 of the John D. Dingell, Jr. Conservation, Management, and Recreation Act of 2019 (Dingell Act) established the Alaska Native Vietnam-Era Veterans Land Allotment Program (Allotment Program), which provides eligible individuals with the opportunity to select an allotment of between 2.5 and 160 acres from "available Federal land" in Alaska.[1,2] Today, there are approximately 1.2 million acres of available Federal land. The Department of the Interior (DOI) is considering whether to open, in whole or in part, an additional approximately 27.5 million acres of BLM-administered lands, currently withdrawn pursuant to Section 17(d)(1) of the Alaska Native Claims Settlement Act (ANCSA) to allotment selection under the Allotment Program (Appendix A, Map 1). In this environmental assessment (EA), the Bureau of Land Management (BLM) evaluates the environmental effects of opening these additional lands to allotment selections under the Allotment Program. Chapter 1 provides the context for analysis disclosed in this EA, describes the purpose and need for action, and identifies the considerations that the BLM will use for identifying and recommending lands for the Secretary to open for selection under the Allotment Program.

1.2 Background

Land transfers to individual Alaska Natives were first authorized by the Alaska Native Allotment Act of 1906 (1906 Act), which authorized the Secretary to convey up to 160 acres of land to individual Alaska Natives. Many Alaska Natives were unaware of this program, in large part due to communication hurdles such as the difficultly of public outreach at that time and language barriers. The 1906 Act was repealed in 1971 with the passing of the ANCSA. Prior to the repeal, there was a concerted effort to notify Alaska Natives about their allotment right; however this outreach effort took place during the Vietnam War, during which many Alaska Natives were serving in the military and, as a result, not able to apply for an allotment under the 1906 Act before it was repealed. Congress initially attempted to address the issue of Alaska Native Vietnam-era veterans' allotments by passing the Alaska Native Veterans Allotment Act of 1998. However, some components of that statute complicated veterans' ability to claim an allotment, including a personal use and occupancy requirement, a short service window for eligibility (Jan. 1, 1969–Dec. 31, 1971), and an 18-month application period. The Dingell Act addressed these concerns establishing a 5-year period for new applications (slated to expire in December 2025), removing the requirement for personal use and occupancy, and extending the military-service eligibility window (Aug. 5, 1964, and Dec. 31, 1971). Pursuant to the Dingell Act's Allotment Program, the BLM is currently accepting allotment applications and actively working to convey selected allotments within the 1.2 million acres of land currently available for selection.

In 2020 and 2021, the DOI prepared Public Land Orders (PLO Nos.) 7899, 7900, 7901, 7902, and 7903 that would have revoked ANCSA Section 17(d)(1) withdrawals on approximately 27.5 million acres of BLM-managed land within Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas.[3] However, as described in 86 FR 20193 (published on April 16, 2021),

[1] Pub. L. No. 116-9, Title I, 1119, 133 Stat. 630 (2019) (codified at 43 U.S.C. 1629g-1).
[2] The Dingell Act defines "available Federal lands" as vacant, unappropriated, and unreserved lands or lands selected by, but not conveyed to, the State of Alaska or an Alaska Native corporation; where BLM has certified the land as free of contaminants (43 U.S.C 1629g-1(a)(1)).
[3] In 1971, Section 17(d)(1) of ANCSA directed the Secretary to "review the public lands in Alaska and determine whether any portion of these lands should be withdrawn… to insure [sic] that the public interest in these lands is

the DOI subsequently identified legal defects in the decision-making processes that led to these PLOs and as a result, the DOI deferred the opening order for PLO 7899 until April 16, 2023, and deferred publication for the remaining PLOs until further review of those PLOs is complete. In the interim, the DOI directed the BLM to prioritize completing this EA to consider opening lands within those five planning areas to allotment selection under the Allotment Program.

1.3 Purpose and Need

The DOI is considering whether to open approximately 27.5 million acres of BLM-managed lands located within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas to allotment selection by eligible Alaska Native Vietnam-era veterans under the Allotment Program which are currently withdrawn by certain PLOs issued under ANCSA Section 17(d)(1).

While the Dingell Act addressed many issues found in previous allotment programs, during scoping for the regulations implementing the Act, the BLM and the DOI heard from Alaska Natives that the pool of available lands open for selection is not sufficient. The Dingell Act defines "available Federal lands" as vacant, unappropriated, and unreserved lands or lands selected by, but not conveyed to, the State of Alaska or an Alaska Native corporation, where the BLM has certified the land as free of contaminants.[4] In general, vacant, unappropriated, and unreserved lands are lands that are not reserved for other purposes (e.g., withdrawals under Section 11 of ANCSA, permitted cabins, and Federal Highway Administration rights-of-way). Available Federal lands, as defined by the Dingell Act, also exclude lands managed by Federal land management agencies other than the BLM, including the National Park Service, U.S. Forest Service, and U.S. Fish and Wildlife Service. Currently, there are approximately 1.2 million acres of BLM-administered lands available to allotment selection, all of which are located in the vicinity of Fortymile, Bering Glacier, and Goodnews Bay. Some of this land is difficult to access, and in many cases, the land may not be located near an applicant's Native village, or near where an applicant is residing today (Appendix A, Maps 2a through 2c). Furthermore, roughly 67 percent of the 1.2 million acres of land currently available for allotment selection is already selected by the State of Alaska under the Alaska Statehood Act or by an Alaska Native corporation for conveyance under ANCSA, and would need to be voluntarily relinquished by the State or the corporation before the BLM could convey an allotment under the Allotment Program (Appendix A, Maps 2a through 2c). Opening the lands to allotment selection, as analyzed in this EA, would increase the quantity and the geographic diversity of the lands available for selection by eligible Alaska Native Vietnam-era veterans.

The DOI is also responding to the need to make a decision regarding opening additional lands to allotment selection under the Allotment Program expeditiously, separately from any decision that the DOI might make regarding opening the lands at issue for other purposes. First, the Dingell Act provides only a 5-year window during which eligible individuals can submit an application for an allotment—no applications can be accepted after December 29, 2025.[5] Further, because eligible veterans must have served in the U.S. military between August 5, 1964, and December 31, 1971, the youngest eligible veterans are nearly 70 years old today. Any delays in making additional lands available may mean that some eligible veterans will not have the opportunity to receive their allotments in their lifetimes.

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properly protected." It then directed that, "any further withdrawal shall require an affirmative act by the Secretary under his existing authority…" 43 U.S.C. 1616(d)(1). Consistent with section 17(d)(1), the Secretary issued a series of PLOs from 1972 to 1973—under "authority provided for in existing law" and delegated to him by the President in Executive Order 10,355 (17 FR 4831)—that withdrew more than 158 million acres of land in Alaska from appropriation under the public land laws, including the lands at issue in this EA. These are what are generally referred to as ANCSA 17(d)(1) withdrawals.

[4] 43 U.S.C. 1629g-1(a)(1).

[5] 43 CFR 2569.401(a).

Moreover, while the program allows the heirs of deceased eligible Vietnam-era veterans to receive an allotment, doing so requires the heirs to petition the Alaska State Court to have a personal representative appointed for the estate of the deceased individual, which can be a lengthy and burdensome process that is outside of DOI's control and can further delay the submission of applications. Due to these factors, the DOI wants to ensure that eligible individuals have as much time as possible to apply for allotments on the additional lands if it does decide to open those lands to selection.

1.4 Decision to be Made

Based on the analysis contained in this EA, the DOI will decide whether to open certain lands currently withdrawn under ANCSA Section 17(d)(1) to allotment selection under the Allotment Program. Additionally, the BLM will determine if there are any significant environmental impacts associated with opening these lands to allotment selection or if this action warrants further analysis in an environmental impact statement (EIS). The DOI will consider the analysis in this EA when evaluating the following options:

- Open some or all of the 27 million acres of lands currently withdrawn under ANCSA Section 17(d)(1) within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas to allotment selections under the Allotment Program;
- Not open these lands to allotment selections under the Allotment Program; or
- Prepare an EIS before proceeding to a further decision.

1.5 Conformance with Land Use Plans

The Proposed Action is in conformance with the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska approved Resource Management Plans (RMP). Each of these approved RMPs currently includes recommendations to lift ANCSA Section 17(d)(1) withdrawals.

1.6 Relationship to Statutes, Regulations, Other NEPA Documents

The alternatives analyzed in this EA comply with Federal environmental statutes and regulations, Executive Orders (EOs), and Department of the Interior and BLM policies. Key statutes, regulations, and policies with bearing on the Proposed Action are listed below:

- Alaska Native Claims Settlement Act (1971)
- Federal Land Policy and Management Act (1976)
- Section 1119 of the John D. Dingell, Jr. Conservation, Management, and Recreation Act (2019)
- Alaska National Interest Lands Conservation Act (1980)
- Bay Proposed RMP/Final EIS (2007) and Approved Record of Decision (ROD) (2008)
- East Alaska Proposed RMP/Final EIS (2006) and Approved ROD (2007)
- Kobuk-Seward Peninsula Proposed RMP/Final EIS (2007) and Approved ROD (2008)
- Ring of Fire Proposed RMP/Final EIS (2006) and Approved ROD (2008)
- Bering Sea-Western Interior Proposed RMP/Final EIS (2020) and Approved ROD (2021)
- Secretary's Order 3373 Evaluating Public Access in Bureau of Land Management (BLM) Public Land Disposals and Exchanges

- Information Bulletin 2020-010 – Implementation of Secretary's Order 3373: Evaluating Public Access in Bureau of Land Management Public Land Disposals and Exchanges
- National Environmental Policy Act (NEPA) (1969)
- BLM National Environmental Policy Act Handbook 1790
- Endangered Species Act (ESA) (1973)
- Section 106 of the National Historic Preservation Act (NHPA) (1966, as amended)
- Paleontological Resources Protection Act (PRPA) of 2009
- Executive Orders 13007 and 13175
- BLM Manual and Handbook 1780, Tribal Relations

1.7 Scoping and Issue Development

Scoping is the process by which the BLM solicits external and internal input on potential issues for analysis. The BLM published a Notice of Intent to prepare an EA on July 23, 2021 (86 FR 20193) and opened a 60-day public scoping period to receive input on opening certain lands to allotment selection. The BLM received 14 comment submissions. Of these, one letter was received from an Alaska Native Veteran, one letter was received from a Federally Recognized Tribe, and two were received from Alaska Native corporations. The remaining letters were received from non-governmental organizations, State, or Federal agencies.

During October and November 2021, the EA interdisciplinary team reviewed comments received during scoping, reviewed the Proposed Action in the context of their subject matter expertise, and developed issues for analysis (see Section 1.8, Issues Identified for Analysis).

1.8 Issues Identified for Analysis

The BLM identified issues based on applicable law, information gathered during scoping, and review of the Proposed Action. The issues identified point the BLM to possible environmental effects. Issues warrant detailed analysis if: 1) analysis of the issue is necessary to provide the decision maker with information to make a reasoned choice between alternatives presented; or 2) the analysis of the issue is necessary to determine the significance of the impacts (BLM H-1790, p. 41). Analysis of these issues provides a meaningful basis for comparing the environmental effects of alternatives, including the No Action Alternative, aiding in the decision-making process. The following are the issues identified for analysis in detail in Chapter 3 of this EA.

Issue 1.8.1 How would opening lands to allotment selection affect individual and community rights to subsistence uses in Alaska? How would public access changes resulting from potential allotment selections affect subsistence use?

Issue 1.8.2 How would opening lands to allotment selection affect local water quality and aquatic habitat conditions, particularly anadromous fish habitats?

Issue 1.8.3 How would opening lands to allotment selection affect riparian and wetland habitat conditions as well as floodplain function?

Issue 1.8.4 How would opening lands to allotment selection affect cultural resources?

Issue 1.8.5 How would opening lands to allotment selection affect recreation management and public access?

1.9 Issues Identified but Eliminated from Further Analysis

Comments received during public scoping raised resource issues on which the Proposed Action would have only negligible or no effects and therefore did not warrant being presented in detail. Summaries of these issues, the analysis conducted, and the reasons why these issues were not presented in detail are described below.

Issue 1.9.1 How would the Proposed Action affect climate change?

One public comment suggested BLM should "include a robust review of new climate science and an analysis of climate related impacts." Climate change is occurring, and Alaska is on the forefront of the impacts. A detailed discussion on climate change and the changes being experienced in Alaska is available in the 2020 BLM Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends, available at https://www.blm.gov/content/ghg/. The bulk of the potential activities described in Section 3.2, Project Development, are activities that have minimal impact on climate change. Of the activities listed in Section 3.2, only land clearing would have an impact on greenhouse gases and climate change because it would reduce the area's ability to sequester carbon. However, as demonstrated in Table 5, only 0.0027 percent of total acres within existing allotments acres have been cleared. It is expected that any new allotments would be used in the same manner. The number of acres of potentially newly cleared land would be so small that it would not result in a measurable effect of carbon sequestration across 27.5 million acres. There is no potential for the Proposed Action to significantly affect climate change; therefore, this issue was eliminated from detailed analysis in this EA.

Issue 1.9.2 This environmental assessment (EA) should discuss the potential for pre-existing contamination on the subject lands.

The BLM was asked to analyze opening contaminated lands. Per the Dingell Act, the Secretary shall "certify that the available Federal land . . . is free of known contamination."[6] When new lands become otherwise available, like under the Proposed Action, the BLM reviews the land to determine if they are free of known contaminants. Any land with known contaminants is deemed not "available Federal land" per the Dingell Act and will not be available for selection under the Program even if the land is opened to operation of Section 1119 of the Dingell Act under this action.[7]

Issue 1.9.3 How would the Proposed Action affect Special Status plants?

BLM Alaska currently has a list of 51 Special Status Species (SSS) Plants. Of the 695 known occurrences of BLM AK SSS Plants, 14 occurrences were recorded within the lands that could be opened to allotment selection, representing 7 different species (noted by an asterisk in Appendix B, Table 12). Most of Alaska's SSS Plants are listed as Not Likely Present or Impacted (NLI), because their known habitats are limited to steep slopes, wetlands, or water bodies, which are unlikely to be selected for allotments as described in Section 3.2, Project Development, and even if they are part of a selected allotment, the portions of the allotment that contain these habitats are unlikely to be disturbed. Only 14 species are Potentially Present or Impacted (PI), most of which are listed as PI because a lack of adequate surveys for

[6] 43 U.S.C. 1629g-1(b)(5)(B)(i), as implemented in the regulations at 43 CFR 2569.201(b), 43 CFR 2569.602, and 43 CFR 2569.604.
[7] 43 CFR 2569.604.

these species and a lack of information on their habitat and range prevents the BLM from listing them as NLI.

Direct effects to SSS Plants would range from minor crushing of foliage and stems that would have limited effects on vegetative resources to extensive damage or complete removal of parts of plants and whole plants from clearing or cutting, which would inhibit or prevent normal growth and reproduction or result in plant mortality.

The review of 163 randomly selected allotments (1 percent) found that only 25 allotments (15.3 percent) contained any evidence of human use and that 99.9 percent of the total acreage reviewed was unaltered (Section 3.2, Project Development, Table 5). The likelihood that opening lands to allotment selection under Alternative B or C would disturb or permanently remove SSS habitat effecting the fitness of any given SSS is low based on the BLM's expectation that potential allotments would be primarily used for subsistence use. As documented in the review of 163 allotments, subsistence use activities on these allotments is expected to result in minimal disturbance. Additionally, most known SSS Plant habitats are not found in landscapes suitable for typical uses assumed by the BLM, such as clearing land, building a cabin, or developing a camping area. Direct and indirect impacts to SSS Plants would be unlikely to occur and would likely be minor in SSS Plant populations if they were to occur.

Issue 1.9.4 How would the Proposed Action affect Special Status wildlife?

BLM Alaska's SSS wildlife consists of birds, mammals, and invertebrates (Appendix B, Table 13). The types of terrestrial habitat resources that would be potentially impacted by activities the BLM expects could occur as result of allotment selection, such as clearing land, building a cabin, or developing a camping are, are boreal forest and subarctic tundra, and to a lesser extent arctic tundra, glacier, and temperate rainforest. Included in these areas are rivers, streams, lakes, ponds, floodplains, and wetlands, all of which provide valuable habitat for wildlife species. Most of the habitat is subject to a natural disturbance regime that will often include fire, floods, blowdown, and pests and disease. These disturbances provide a variety of vegetational successional phases in a mosaic pattern across the landscape, which maximizes diversity on the landscape scale. Habitat is generally well connected, and species are able to move naturally across the landscape. Direct anthropogenic disturbance is minimal but the impacts of climate change (e.g., shifts in plant and animal ranges, melting permafrost, erosion, saltwater intrusion, phenological mismatch) are affecting all habitats and likely all species (Kobuk Seward PRMP/FEIS Chapter 3, Section 7; Ring of Fire PRMPA/FEIS Section 3.2.9; Bay PRMP/FEIS Chapter 3, Section 6; BSWI PRMP/FEIS Section 3.2.7; and East Alaska PRMP/FEIS Chapter 5, Section 8). This information is incorporated by reference into this EA.

Opening lands to allotment selection under Alternative B and C could result in direct effects to SSS wildlife and their habitats. Direct effects would include crushing or clearing of vegetations, which would have a short-term negative effect on habitat for most wildlife species. However, in the long-term, minor levels of vegetative disturbance could benefit some species that favor early succession habitats (e.g., bumblebees, olive-side flycatcher) while affecting others that prefer later succession habitats. Another potential effect of the ground disturbance is the increased likelihood of the introduction and establishment of invasive plant species, which could negatively impact native wildlife. Disturbance may also include hunting and harvesting of SSS wildlife or their food sources, direct physical harm, visual disturbance, and auditory disturbance resulting in stress, changes in behavior, reduction in reproductive capacity, and/or direct wildlife injury or mortality from disturbance. Effects and magnitude of disturbance will vary by species and season, with many species exhibiting periods when they are more susceptible to disturbance (e.g., nesting season).

Once an allotment is conveyed into private ownership, little protection is provided to SSS wildlife. Portions of ESA, Marine Mammal Protection Act (MMPA), and Migratory Bird Treaty Act (MBTA) would still apply and provide some protections for species on those lists. Alterations to vegetation and physical disturbance during nesting season could reduce bird (including BLM Sensitive and MBTA bird species) nesting success and could cause direct mortality in an area allowing for a disturbance radius that may be over 7,968 acres. It is not likely that there would be any population-level effects to bird species because the disturbances are expected to be well distributed.

Four ESA-listed species (SSS lists include any ESA-listed species) managed by the U.S. Fish and Wildlife Service (USFWS) are present in or near the lands under consideration for opening to allotment selection: polar bear, Steller's eider, spectacled eider, and wood bison. There is no federally designated critical habitat within the lands proposed for opening to allotment selection for any species. Polar bears that inhabit the western Arctic coast of Alaska are from the Chukchi/Bering Sea subpopulation or stock. The 2017 stock assessment estimated the minimum population at 2,000 (USFWS 2017). According to the USFWS polar bear range map (USFWS 2021b), approximately 2,552,000 acres of their range overlaps with the lands in Alternative B. Similarly, approximately 2,548,000 acres within the range of the polar bear overlaps with the lands to be opened in Alternative C.

Some activities the BLM expects could occur as result of allotment selection, such as clearing land, building a cabin, or developing a camping area could temporarily disturb polar bears. However, because polar bears occur at a very low density along the coast and outside of the lands under consideration for opening and because these types of actives would not have the potential to result in injury or death of a bear, opening these lands to allotment selection is not likely to adversely affect list ESA-listed polar bears.

Eiders have an offshore migratory pattern but may pass near some of the lands that would be opened under either of these action alternatives or land between nesting and wintering areas, but eiders do not nest in any portion of the lands proposed for opening. Due to the lack of nesting habitat within the lands under consideration for opening to allotment selection and the offshore migratory patterns that would cause most listed eiders to completely avoid the area potentially opened to allotment selection, opening these lands to allotment selection is not likely to adversely affect ESA-listed eiders.

Wood bison are designated an ESA section 10(j) non-essential experimental population and does not require formal ESA section 7 consultation. There is not designated critical habitat for this species. Land under consideration for opening overlaps with the potential range of the wood bison, however, the habitat for the species is managed collaboratively among many landowners and managers as part of the Wood Bison Management Plan for the Lower Innoko/Yukon River in West central Alaska (Alaska Wood Bison Management Planning Team 2015) under the vision to "...manage a sustainable wood bison herd while ensuring a healthy landscape benefitting all people for future generations".

The northern sea otter and Pacific walrus (described in Table 10, Appendix B), are other marine mammals listed as threatened or endangered under the ESA are found offshore of the project area. These include sub-Arctic whales and ice seals, as well as designated critical habitat for some of these species. Action alternatives would open land to allotment selection and since allotments necessarily would be selected on land, there would be no effect to any marine mammal species listed under the ESA or adverse modification to critical habitat.

Issue 1.9.5 What are the effects on environmental justice populations, and are there any negative and disproportionate effects?

Executive Order 12894 (1994) mandated that Federal actions be assessed for any effects on environmental justice, especially those that would result in negative, disproportionate effects on low-income, minority, and tribal populations. All alternatives, as described in Chapter 2, Alternatives, would have some effect on eligible Alaska Native Vietnam-Era Veterans or their heirs, which is, by definition, an environmental justice population.

Many eligible individuals (although not all) are from communities that participate in a mixed subsistence-cash economy. Often these communities are governed by both State and Federal institutions and informed by traditional knowledge. Subsistence hunting, fishing, and gathering defines economic and social life in rural Alaska. Subsistence activities are supplemented by income derived from typically scarce wage employment that is invested into technologies and resources needed to harvest wild foods.

Under the No Action Alternative, individuals eligible for an allotment would be limited to selecting an allotment within currently available Federal land (approximately 1.2 million acres), located in the vicinity of Fortymile, Bering Glacier, and Goodnews Bay, as described in Section 1.3, Purpose and Need. Some of this land is difficult to access and may not be located near an applicant's Native village or near where an applicant is established today. For some eligible individuals this could result in an individual not fully utilizing the property as they otherwise would if the allotment was closer to their community or easier to access. Individuals that selected an allotment in these areas would own their allotments and could sell their allotment to acquire land in a location closer to their home or community[8]. Local, existing communities in the vicinity of Fortymile, Bering Glacier, and Goodnews Bay could be impacted more than if the allotment selections occurred over a more dispersed land area due to a concentration of new allotments into a smaller geographic area. For example, this could bring more economic opportunities to existing, local populations through providing transportation for the allottees to their land but may increase the pressure on subsistence resources as more people come into the community for subsistence activities.

Under Alternatives B and C, up to 27.5 million acres would be opened to allotment selection, which would provide eligible individuals a better opportunity to identify and select desirable allotments. Allotment selection, as described in Section 3.4, Project Development, would be expected to be more dispersed across the landscape and would therefore not concentrate allotment selection within the vicinity of Fortymile, Bering Glacier, and Goodnews Bay.

If the No Action Alternative were selected, eligible individuals would be limited to the 1.2 million acres currently available from which to select their allotment; this would be an adverse impact on the population of eligible individuals when compared with Alternatives B and C. Local communities within the vicinity of currently available Federal land may experience both beneficial effects (such as increased economic opportunities associated with new allotments) and adverse effects (such as increased pressure on local subsistence activities) when compared with Alternatives B and C. Both Alternative B and C would provide beneficial effects to the population of eligible individuals because there would be more available Federal land to select an allotment from.

[8] Allotment conveyed to eligible individual would have a restriction on alienation, which requires that any transfer of interest be approved by the BIA before it becomes final. An allottee could request the BIA to remove the restriction on alienation (25 CFR 152.10). The BIA would then review whether the person has any known reason that they cannot manage their land, and if no such reason is identified, the BIA would remove the restriction on alienation (25 CFR 152.11).

Issue 1.9.6 How would the Proposed Action affect ACECs?

The BLM received comments during scoping that requested an analysis of the effects of opening lands to allotment selection on proposed or existing areas of critical environmental concern (ACEC). Within the lands under consideration for opening, there are seven existing ACECs and no proposed ACECs. These ACECs are shown in Appendix A on Maps 3a through 3m and listed in Table 1.

Table 1: Existing ACECs Located within Lands under Consideration for Opening to Allotment Selection

ACEC (Associated RMP)	Acres	ACEC Description
Inglutalik River (Kobuk-Seward)	466,000	These three ACECs are managed to protect anadromous fish habitat. The ACECs encompass the Inglutalik, Ungalik, and Shaktoolik rivers, which support populations of Dolly Varden, Arctic grayling, salmon (chum, coho, pink, and, to some degree, Chinook), and whitefish. They provide important habitat for both resident and anadromous fish. There are no roads or existing development within or adjacent to these three ACECs (BLM 2008, p. 3-236).
Ungalik River (Kobuk-Seward)	264,000	
Shaktoolik River (Kobuk-Seward)	234,000	
Mount Osborn (Kobuk-Seward)	82,000	Managed to protect genetically unique Kigluaik Arctic char (BLM 2008, p. 10). Mount Osborn is the highest point on the Seward Peninsula. This range contains precipitous peaks, picturesque cirques, and wild-running waterways. This area is highly accessible to the communities of Nome and Teller, which raises the fragile and unique area's vulnerability to change (BLM 2008, p. 3-237).
Neacola Mountains (Ring of Fire)	230,162	Managed to maintain the visual resources and scenic values (BLM 2008, p. 10). This ACEC changes in elevation from 1,000 feet to nearly 8,000 feet and is characterized by rugged mountains, hanging valleys, and ice and snow fields. It is interspersed with sharp ridgelines. At the core of the ACEC is Blockade Glacier and Lake. Seasonally, Blockade Lake melts enough to reveal "apartment sized" blocks of ice floating in the water (BLM 2013, p. 9). Today, the area is used by skiers; the BLM permits helicopter-supported skier descents. There are no roads within or adjacent to the ACEC.
Nulato Hills (Kobuk-Seward)	1,080,000	This ACEC contains a critical wintering area for the Western Arctic caribou herd (WACH). Although caribou are known for their wandering lifestyle and ever-changing distribution, the Nulato Hills were a critical portion of the WACH winter range during the mid-80s to mid-90s, and has received heavy use during some winters since that time. The herd is one of the most important subsistence resources in the entire northwest portion of the state. Approximately 40 villages utilize the herd for subsistence purposes, with 15,000–20,000 animals being harvested annually (BLM 2008 p. 3-236).
Western Arctic Caribou Insect Relief (Kobuk-Seward)	1,529,000	This ACEC protects the WACH critical insect relief habitat and calving grounds. There is cause for concern due to the potential for future development in the area. The ACEC is adjacent to high quality coal reserves and there is potential for future development of infrastructure to support development of coal resources. Caribou are plagued by numerous insect pests such as warble flies, mosquitoes, and nose bots during this period. They seek windy spots, ground devoid of vegetation, and snow fields to reduce intense insect harassment. (BLM 2008 p. 3-238).

There are four ACECs designated based on anadromous fish habitat. Three of these anadromous fish habitat ACECs—the Inglutalik River, Ungalik River, and Shaktoolik River ACECs—are connected and total about 964,000 acres combined. The Mount Osborn ACEC was designated to protect Kigluaik Arctic char, which is also anadromous. None of these ACECs have developed road infrastructure. Based on the assumptions described in Section 3.2, Project Development, the BLM expects that eligible individuals will select land that can be used for subsistence harvesting and land that is accessible, either by road or waterway, and that these allotments would be used predominantly for personal use. Activities on lands used for personal use and subsistence harvesting would be limited to clearing land, building a cabin, or developing a camping area. Section 3.5, which analyzes local water quality and aquatic habitat conditions, including anadromous fish habitats, showed that most historic allotment selections were located within the 100-year floodplain and that allotments located in these areas would have the potential for increased surface erosion and runoff. Even though the BLM expects allotment selections to be located near rivers

that contain anadromous fish habitats, the analysis of historical use patterns showed limited surface disturbance in these locations and that the subset of examined allotments within the 100-year floodplain was found to average less than 1 acre and affect less than 1 percent of each allotment's overall extent. No stream shoreline impacts were noted during the assessment of existing allotments. In addition, an examination of the entire Native Allotment dataset using Geographical Information System (GIS) found minimal overlap between allotments and sensitive aquatic habitats (i.e., anadromous spawning areas). Given the conclusions found in the local water quality and aquatic habitat analysis and that allotment selections are expected to be dispersed among the lands under consideration for opening to allotment selection, potential negative effects to local water quality and aquatic resources are likely to be minimal. While allotment selections within the Inglutalik, Ungalik, and Shaktoolik rivers, and Mount Osborn ACECs could occur, these selections would have a minimal effect on the resources for which these ACECs were designed to protect.

The Neacola Mountains ACEC is managed to maintain the visual resources and scenic values (BLM 2008, p. 10). This ACEC is a remote location with no roads within or adjacent to the ACEC. The lack of access, remoteness, and the rugged mountain terrain of this ACEC would make development of any allotments challenging. Because development is not likely here, effects on the visual resources and scenic values are expected to be maintained even if the ACEC is opened to allotment selection.

The Nulato Hills and the Western Arctic Caribou Insect Relief ACECs were designated and are managed to protect habitat for the Western Arctic caribou herd (WACH), which is a critical subsistence resource for Alaska Natives. Some existing allotments are located adjacent to rivers that run through these ACECs. Neither ACEC can be accessed by road and these existing allotments are likely to be predominately accessed by boat. These allotments do not appear to have any development and are assumed to be used for subsistence use. The BLM expects little to no effect on the ability for the ACECs to continue to protect habitat for the WACH given the size of the Nulato Hills and the Western Arctic Caribou Insect Relief ACECs (1,080,000 acres and 1,529,000, respectively) and the reasonably foreseeable uses of the allotments including the low likelihood for development.

Issue 1.9.7 How would allotment selection affect valid existing rights of authorized land and realty actions?

Much of the area under consideration is undeveloped. As of February 11, 2022, the BLM has approximately 800 land use authorizations located within the lands under consideration for opening to allotment selection, including rights-of-way, leases, and permits.

Under the Proposed Action, up to approximately 27.5 million acres of additional lands would be opened for selection by eligible Alaska Native Veterans per the Dingell Act.

Generally, existing rights-of-way and authorizations (i.e., permits, leases, easements) we have issued may make the lands unavailable for selection because the land is not considered vacant and therefore it is not available for selection. However, the BLM will consider applications on a case-by-case basis and under certain circumstances, an applicant may be able to select land that includes an existing authorization or right-of-way that does not result in the BLM determining the land is not vacant. For instance, the BLM has historically considered linear rights-of-way such as roads or powerlines to be vacant land and any land conveyed would be made subject to these rights-of-way. Existing authorization holders located within the selected area would be notified upon approval of the application that the lands would be conveyed out of Federal ownership. Prior to conveyance, the grant holder(s) would be offered the opportunity to convert the authorization to a perpetual right-of-way or permanent easement in accordance with 43 CFR 2807.15. Under 43 CFR Subpart 2920, conveyances out of Federal ownership would be made subject to any leases or easements; however, permits would be immediately revoked, and the

conveyance would not be made subject to a permit. The BLM would then issue a Certificate of Allotment subject to any valid existing rights.

When the BLM deems an application to be complete in accordance with 43 CFR 2569.11, the land described in the selection would be segregated. Segregation, as defined by 43 CFR 2091.0-5(b), "means the removal for a limited period, subject to valid existing rights, of a specified area of the public lands from the operation of some or all of the public land laws, including the mineral laws, pursuant to the exercise by the Secretary of regulatory authority for the orderly administration of the public lands." BLM would add the segregated lands to the appropriate master title plat to make the public aware that the land has been segregated from the public land laws (43 CFR 2569.501(a)). The selected lands would be segregated until the land is conveyed or the application is rejected or relinquished. Once segregated, no new land use authorization applications would be accepted or approved on the selected lands.

If the lands considered in Alternative B or C were opened to allotment selection, the BLM would not grant land use authorizations on lands with allotment selections because the lands would first be segregated and unavailable and then conveyed out of Federal ownership and management. All allotments would be subject to valid existing rights. Opening the land to selection of allotments under the Allotment Program will have only minimal impact on valid existing rights and on BLM's ability to regulate realty actions in the lands under consideration given the large amount of land opened and relatively small amount of land that will be conveyed.

Issue 1.9.8 How would opening lands to allotment selection affect scientifically important paleontological resources having potential fossil yield classifications Class 4 or Class 5?

Paleontological resources are any fossilized remains, traces, or imprints of organisms which have been preserved in or on the earth's crust. They provide important information about the history of life on earth. The occurrence of paleontological resources is highly correlated to the geologic units (e.g., beds, formations, or members) that contain them.

On BLM-administered surface lands, the primary authority under which the BLM manages, preserves, and protects paleontological resources, is the Paleontological Resources Protection Act of 2009 (PRPA) (16 U.S.C. 470aaa et seq.). In accordance with the PRPA, paleontological resources on Federal land must be managed and protected using scientific principles and expertise. Among other provisions, the PRPA authorizes collection of paleontological resources from public lands either by a permit for scientific collecting and common invertebrate and plant paleontological resources without a permit as casual collection. It also requires a program for public awareness and education of the importance of paleontological resources from public lands as well as the inventory of Federal lands for paleontological resources. These provisions do not apply on privately held surface lands or those administered or controlled by any entity other than the DOI or the Department of Agriculture.

When assessing impacts to paleontological resources in accordance with NEPA, the BLM is required to use the Potential Fossil Yield Classification (PFYC) System as provided for under BLM Instruction Manual IM-2016-124 (BLM 2007b; BLM 2016) (Table 2). The system provides a consistent and streamlined approach to determine if a potential action may affect paleontological resources on public lands. The PFYC is created from available geologic maps and assigns a class value to each geological unit, representing the potential abundance and significance of paleontological resources that occur in that geological unit. The probability for impacting significant paleontological resources is highest in PFYC Class 4 and Class 5 geological units (Table 2).

Potential paleontological impacts are determined at the geological unit level. Every geologic unit can be assigned a PFYC class based on the probability and abundance of known vertebrate fossils and

scientifically significant invertebrate and plant fossils as well as their sensitivity to adverse impacts (BLM 2007b; BLM 2016). A PFYC model for Alaska is in development. Preliminary PFYC values have been assigned to the mapped geologic units in the planning area and applied to geospatial data sets using ArcGIS software. Mapped geologic units may occur over expansive geographic areas.

PFYC values range from Class 1 (very low) to Class 5 (very high) and indicate the probability for the mapped unit to contain significant paleontological resources and the degree of management concern for the resource. Geologic units without enough information to assign a PFYC value are assigned Class U (Unknown Potential). The PFYC Classes are listed below in Table 2.

Inventories of paleontological materials on BLM-managed lands in Alaska are limited, including within those areas comprising the 27.5-million-acre project area. Nevertheless, a combination of desktop surveys, academic research projects, and other activities that produce field samples and finds (e.g., U.S. Geologic Survey sampling), indicate a wide range of vertebrate, invertebrate, and plant fossils are known to occur within the project area. Additional details on the types of fossils and fossil-bearing geologic units identified within the project area are included in each of the five RMPs encompassing the project area (Kobuk Seward PRMP/FEIS Chapter 3, Section 11; Ring of Fire PRMPA/FEIS Section 3.2.15; Bay PRMP/FEIS Chapter 3, Section 10; BSWI PRMP/FEIS Section 3.2.11; and East Alaska PRMP/FEIS Chapter 3, Section 8). This information is incorporated by reference into this EA.

Table 2: PFYC Classes

PFYC	Characteristics
Class 1 – Very Low	Igneous or metamorphic units; units that are Precambrian or older.
Class 2 – Low	Sedimentary units where significant fossils are unlikely; generally younger than 10,000 years before present; recent aeolian.
Class 3 – Moderate	Sedimentary geologic units where fossil content varies in significance, abundance, and predictable occurrence.
Class 4 – High	Geologic units that are known to contain a high occurrence of significant fossils.
Class 5 – Very High	Highly fossiliferous geologic units that consistently and predictably produce significant paleontological resources.
Class U – Unknown	Geologic units that cannot receive an informed PFYC assignment; fossils could be present, but there is insufficient knowledge about the unit.

Within the 27.5-million-acre project area, approximately 14 million acres (50 percent) overlay geologic units have been assigned a Preliminary PFYC Class 1–5 in the current Alaska model under development. The remaining 14 million acres are either PFYC Class U (approximately 13 million acres) or are covered by water or ice.

Within the 27.5 million acres under consideration for opening under Alternative B, approximately 1 million acres (about 3.6 percent) are within PFYC Class 4 units, and 109,000 acres (about 0.38 percent) are PFYC Class 5 units (see Appendix B, Table 10) for complete breakdown by land status).

If lands within PFYC Class 4 or Class 5 units were to pass out of Federal ownership, they would no longer be subject to management consistent with the PRPA and other applicable agency policies and guidelines which promote the protection and inventory of scientifically important paleontological resources. Consistent with the development scenario described in Section 3.2, surface disturbing activities on selected allotments by eligible individuals could damage or destroy scientifically important paleontological resources or diminish their geological context; however, it is by virtue of such impacting activities that paleontological discoveries are often made, and scientific knowledge is increased.

Although there are at least 1.1 million acres of PFYC Class 4 and Class 5 units within the 27.5-million-acre project area under Alternative B, only about 701,000 acres (2.5 percent of the total project area) are

not State or Native selected and therefore mostly likely to be conveyed out of federal ownership through the Allotment Program. Furthermore, even if all eligible individuals were to select allotments of the maximum size (160 acres) within these PFYC 4 and 5 units, only 480,000 could potentially be conveyed. These parcels would likely be isolated and distributed across a large geographic area. On this basis, impacts to scientifically important paleontological resources would be minimal as those parcels potentially conveyed out of Federal ownership comprise small areas within widespread geologic formations which remain available for study.

Alternative C would have the same impacts as Alternative B but there are fewer lands within PFYC Class 4 or 5 units – approximately 680,000 acres – which could be potentially made available for allotment selection (Appendix B, Table 11)

2 Alternatives

2.1 Alternative A—No Action Alternative

Under Alternative A, the BLM-administered land under consideration for opening to allotment selection within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas would continue to be withdrawn under existing PLOs.

2.2 Alternative B—Proposed Action Alternative

Under Alternative B, the Department would open approximately 27.5 million acres of additional land, currently withdrawn under ANCSA Section 17(d)(1) within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas to selections under the Alaska Native Vietnam-Era Veteran Allotment Program (Appendix A, Maps 3a through 3m). The proposed action would not open lands within endangered species critical habitat or lands administered by other agencies and would not open lands within a quarter mile of certain identified cultural resource sites (see Section 2.2.1, Section 3.7). The BLM is considering, and requests public input on, additional limitations on lands to be opened to allotment selection in order to protect other important resources and designations on the landscape, such as not opening lands adjacent to ANILCA conservation units or other areas that contain sensitive resources; these features could be incorporated into the final decision. Lands would be opened to Native allotment selection under the Dingell Act's Allotment Program only and for no other purposes.[9]

The Dingell Act prohibits allotment selections in, among other lands, the right-of-way for the Trans-Alaska Pipeline; pending rights-of-way for natural gas corridors; lands withdrawn or acquired for purposes of the Armed Forces; national preserves, monuments, or the national trail system (e.g., Cape Krusenstern National Monument and the Iditarod National Historic Trail Corridor); and wilderness designated by Congress.[10] Within the approximately 27.5 million acres under consideration in the EA, the State of Alaska has existing selections on approximately 6,415,000 acres under the Alaska Statehood Act and ANCSA corporations have existing selections on approximately 878,000 acres under ANCSA. State and Native corporation-selected lands are considered available under the Dingell Act, once the underlying ANCSA Section 17(d)(1) withdrawals are opened to selection under the Dingell Act, if the State or Native corporation agree to voluntarily relinquish their selection for the purposes of allowing allotments to be conveyed to eligible individuals. Maps 3a through 3m (Appendix A) provide the location of lands that would become available to allotment selection by land status and Table 3 provides the total amount in acres of each land status by planning area.

The Dingell Act allows an eligible individual to select one allotment between 2.5 and 160 acres in size from available Federal, BLM-administered lands in Alaska through December 2025. The BLM, in consultation with the Bureau of Indian Affairs (BIA) and Department of Veterans Affairs, estimates that up to 3,000 individuals are eligible to select an allotment under the Allotment Program. If Alternative B were selected no more than approximately 480,000 acres out of the approximately 27.5 million acres of land under consideration (or 1.7 percent) could be transferred out of Federal ownership via conveyance to eligible individuals under the Allotment Program.

[9] Some lands may be subject to more than one withdrawal and will still be reserved, and therefore unavailable, after the ANCSA 17(d)(1) withdrawals are opened to selections under the Allotment Program.

The BLM has already received applications for allotments within the 1.2 million acres of Federal land that is currently available. Each selection that occurs outside of this project area would reduce the total amount of acres that could be conveyed from the lands under consideration in this EA.

2.2.1 Lands Excluded to Protect Cultural Resources

During the NHPA Section 106 consultation process, the BLM identified lands containing historic properties where adverse effects could occur as a result of the proposed action. In order to avoid adverse effects to these important cultural resources, these lands were removed from lands under consideration. The BLM will not open lands for allotment selection within a minimum of a quarter mile of important cultural resource sites, including lands applied for by regional corporations pursuant to ANCSA section 14(h)(1) and known cultural resources that the BLM identified as needing protection (see Section 3.7).[11] Based on the same reasoning, the BLM will similarly not open lands for allotment selection within a minimum of 500 feet of the Iditarod National Historic Trail.[12]

[11] ANCSA section 14(h)(1), codified at 43 U.S.C. 1613(h)(1), allowed regional corporations to apply for "existing cemetery sites and historic places.

[12] During Section 106 consultation, the BLM and SHPO identified the need to protect cultural resource sites within the decision area. These sites would include all ANCSA 14(h)(1) sites that have applications on file with the BLM, the Iditarod National Historic Trail, and those sites identified through the process explained in Section 3.7 as having important cultural resources. To protect identified sites, the areas subject to this exclusion would not be marked on a map but would not be opened to allotment selection. If the BLM were to receive an application that overlaps with a protected cultural resource site, it would be denied, and the applicant would have the opportunity to select another site.

Table 3: Acres of Potentially Available Land by Planning Area for Alternative B

Land Status	Total Acres[1]
Kobuk-Seward Peninsula	9,631,000
Potentially Available after PLO Review	7,240,000
Potentially Available after PLO Review – Subject to Native Selection	300,000
Potentially Available after PLO Review – Subject to State Selection	321,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	0
Ring of Fire	822,000
Potentially Available after PLO Review	381,000
Potentially Available after PLO Review – Subject to Native Selection	58,000
Potentially Available after PLO Review – Subject to State Selection	101,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	1,000
Bay	1,289,000
Potentially Available after PLO Review	1,034,000
Potentially Available after PLO Review – Subject to Native Selection	74,000
Potentially Available after PLO Review – Subject to State Selection	181,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	1,000
BSWI	13,395,000
Potentially Available after PLO Review	10,663,000
Potentially Available after PLO Review – Subject to Native Selection	140,000
Potentially Available after PLO Review – Subject to State Selection	1,168,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	1,000
East Alaska	2,416,000
Potentially Available after PLO Review	616,000
Potentially Available after PLO Review – Subject to Native Selection	289,000
Potentially Available after PLO Review – Subject to State Selection	986,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	14,000
Grand Total:	**27,553,000**

Notes: [1] Acres are rounded to the nearest 1,000 acres and based on data managed in a GIS. These data are approximations only and acres reported within text and tables in this EA may vary slightly than actual acres; differences are due to data origination and are inconsequential to analysis within this EA.

[2] Some land under consideration for opening are selected by both the State and a Native Corporation. For the purposes of this analysis, it makes no difference which selected first; an eligible individual would still need to obtain a relinquishment from the first selectee.

2.3 Alternative C—Exclude State of Alaska "Top Filings" and Lands Identified by Calista from the Lands Under Consideration

During the scoping period, the BLM received a letter from the State of Alaska. The State indicated a preference for BLM to proceed with revocation of the applicable ANCSA 17(d)(1) PLOs that was initiated in 2020 to address both the need to make more acres available under the Alaska Native Veterans Allotment program and the State's desire to have more of their top filed lands become effective selections.[13] Under the 1959 Alaska Statehood Act, the State of Alaska is entitled to approximately 105 million acres of Federal land. The BLM has already conveyed the majority of the entitlement, but the State has approximately 5.2 million acres of entitlement remaining. The State currently has approximately 13 million acres of effective selections and 6.5 million acres of top filings[14] across the State.[15] While not

[13] Many of the arguments in the State's letter are similar to claims made in the State's lawsuit, filed in July 2021 against the Department of the Interior, challenging the Department's deferral of the opening of PLO No. 7899 and the publication of PLO Nos. 7900, 7901, 7902, and 7903 (Alaska v. Haaland, 21-cv-00158 (D. AK. Jul. 7, 2021)). On March 14, 2022, the Federal District Court dismissed all of the State of Alaska's claims, without prejudice.
[14] Under ANILCA section 906(e) (43 U.S.C. 1635(e)) the State may "top file" on lands not available for selection because the land was not vacant, unappropriated, or unreserved and if those lands subsequently become available the State's top filing becomes an effective selection.
[15] The State's right to select more land expired in 1994, so there will not be any further top filings or State selections. ANILCA section 906(a), 96 Pub. L. 487 (1980).

all ANCSA Section 17(d)(1) withdrawals preclude the State from making selections, within the decision area there are not more than 583,000 acres that are top filed. [16] If the land is opened solely to allow for allotment selection under the Dingell Act's Allotment Program, an eligible individual could select an allotment from within State top filed lands, without consent from the State, as would be required in the case of allotment selections on lands covered by effective State selections.[17] Therefore, in response to the State's letter, the BLM is evaluating an alternative which would keep the top filed lands which the State of Alaska has identified as Priority 1 or 2 (roughly 318,000 acres acres) withdrawn until a final decision is made on the full revocation of the ANCSA 17(d)(1) withdrawals for the lands.[18]

The Calista Corporation submitted a letter during public scoping that it opposed opening lands in the Calista Region except lands it identified that it would support opening to allotment selection:

> *"Nonetheless, to make suitable land available for allotments for our honored Alaska Native Vietnam War Era Veterans, Calista does not object to the revocation or reclassification of ANCSA 17(d)(1) withdrawal status of federal lands in the following areas of the YK Region in the BSWI, as may be needed to make such lands available for Dingell Act allotments:*
>
> *1. West of the Village of Stony River: All areas that lie south of the Kuskokwim River.*
> *2. East of the Village of Stony River: All areas that lie more southerly than the Village of Stony River."*

Based on Calista's comment, the BLM is evaluating the possibility of keeping the lands important to Calista (~2,237,000 acres) withdrawn; under this scenario, these lands would not be open to allotment selection (see Map 4e). This outcome is currently analyzed under Alternative C, but this could become a standalone alternative or be handled in another way before the decision stage, based on further public and stakeholder input and/or policy considerations.
Alternative C as it currently exists is the same as Alternative B, including lands that would be excluded for protection of cultural resources (see Section 2.2.1), except that Alternative C would not open important State top filed lands, or lands identified by Calista Corporation. The current Alternative C would open approximately 2.5 million acres less than Alternative B. Lands opened under the current Alternative C are presented in Table 4 and shown on Maps 4a through 4m (Appendix A).

The DOI could select any alternative that fits within the range of alternatives/actions analyzed in this EA. The BLM welcomes public and stakeholder input on Alternative C and how it is framed.

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[16] However, the majority of these lands top filed lands would not immediately become effective selections if the ANCSA 17(d)(1) withdrawals in the decision area were opened to state selection; rather they would remain top filed due to other impediments, such as Alaska Native corporation selections.
[17] An application filed under the Allotment Program segregates the land from actions of the public land laws (43 CFR 2569.501(a)). The State's top filed application is a future interest in the land that does not become an effective selection until the land is made available to State selection. Therefore, the segregation of the lands caused by the application under the Allotment Program would bar the State top-filing for those lands from becoming an effective selection even if the public land orders affecting the land were later opened to State selection.
[18] Pursuant to section 906(f) of the ANILCA, the State provides BLM with its list of priorities for its selections. In that priority list, the State categorizes its selections and "top filings" into four priorities—Priority 1, 2, 3, or 4—with Priority 1 being the highest priority for conveyance. In Alternative C, BLM would not open lands to Native allotment selection subject to a State "top filing" that the State has categorized as Priority 1 or 2. The State is currently over-selected, meaning that the State has more land currently selected than its remaining 5.3 million acres of entitlement; for this reason, BLM will evaluate only removing State "top-filed" Priority 1 and 2 lands from consideration, rather than removing all State "top-filed" lands.

Table 4: Acres of Potentially Available Land by Planning Area for Alternative C

Land Status	Total Acres[1]
Kobuk-Seward Peninsula	9,631,000
Potentially Available after PLO Review	7,261,000
Potentially Available after PLO Review – Subject to Native Selection	300,000
Potentially Available after PLO Review – Subject to State Selection	2,031,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	0
Ring of Fire	818,000
Potentially Available after PLO Review	381,000
Potentially Available after PLO Review – Subject to Native Selection	58,000
Potentially Available after PLO Review – Subject to State Selection	378,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	1,000
Bay	1,286,000
Potentially Available after PLO Review	1,030,000
Potentially Available after PLO Review – Subject to Native Selection	74,000
Potentially Available after PLO Review – Subject to State Selection	181,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	1,000
BSWI	13,395,000
Potentially Available after PLO Review	10,665,000
Potentially Available after PLO Review – Subject to Native Selection	140,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection	1,000
Potentially Available after PLO Review – Subject to State Selection	2,562,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	1,000
East Alaska	2,416,000
Potentially Available after PLO Review	624,000
Potentially Available after PLO Review – Subject to Native Selection	289,000
Potentially Available after PLO Review – Subject to State Selection	1,243,000
Potentially Available after PLO Review – Subject to Native Selection and State Selection[2]	14,000
Grand Total:	**25,000,000**

Notes: [1] Acres are rounded to the nearest 1,000 acres and based on data managed in a GIS. These data are approximations only and acres reported within text and tables in this EA may vary slightly than actual acres; differences are due to data origination and are inconsequential to analysis within this EA.

[2] Some land under consideration for opening are selected by both the State and a Native Corporation. For the purposes of this analysis, it makes no difference which selected first; an eligible individual would still need to obtain a relinquishment from the first selectee.

3 Affected Environment and Environmental Consequences

3.1 Methodology and Assumptions

The Proposed Action considers opening approximately 27.5 million acres of BLM-administered lands within five different planning areas to selection of allotments of up to 160 acres under the Allotment Program. The BLM cannot predict precisely where allotments would be selected once lands are opened to allotment selection or what exact activities would occur on the allotments after conveyance. For this reason, the BLM examined past Native allotment locations and used the findings to determine the reasonably foreseeable future development. This description of reasonably foreseeable development and the reasonably foreseeable future actions are used to evaluate the effects of opening lands to Native allotment selection under the action alternatives described in Chapter 2, Alternatives.

3.2 Project Development

Based on historical Native allotment selections, the BLM expects that eligible individuals will select land that can used be used for subsistence harvesting and land that is accessible, either by road or waterway, and that these allotments would be used predominantly for personal use. Generally, activities on lands used for personal use and subsistence harvesting would be limited to clearing land, building a cabin, or developing a camping area. Allotments located adjacent to a road system or near an area with existing development would have a higher likelihood of increased development. Allotments located within cities or villages are more likely to be subdivided and have multiple houses built on the allotments. Some allotments located near a city or village may be developed for sand or gravel materials, as has happened in the past. Sand and gravel development is unlikely in remote locations due to the lack of access or proximity to demand. All other mineral rights, except sand and gravel, would remain reserved to the U.S. and therefore could not be developed without additional environmental review.

To test the assumption that Native allotment selections would likely be used predominantly for personal use and subsistence harvesting, the BLM reviewed the location and uses of Alaska Native Allotments using datasets and analysis tools within a GIS. First, a random subset of existing allotments was identified for detailed visual analysis using high resolution aerial imagery. The BLM has records of 16,269 existing Native allotments across the state issued under the 1906 Alaska Native Allotment Act and the 1998 Alaska Native Veteran Allotment Act. A review of 163 randomly selected allotments (1 percent) found that only 25 allotments (15.3 percent) contained any evidence of human use. This review showed that, despite the evidence of human use on some allotments, 99.9 percent of the total acreage was unaltered (Table 5). The types of uses on these allotments included semi-permanent features such as houses, cabins, ATV trails, and roads. Features that are more short-term on the landscape, such as snowmachine trails, were also noted based on linear depressions documented in the imagery; networks were also seen across the tundra leading to remote structures or subsistence camps. Allotments with greater disturbance, such as roads and houses, were located nearer to communities than allotments with less disturbance (e.g., no disturbance or trails). While this analysis was only focused on a random review of 1 percent of the existing Native allotments, it supports the BLM's assumptions on the level of development expected to occur on lands conveyed as Alaska Native allotments.

Table 5: Percent of Total Disturbance by Disturbance Type across 163 Randomly Selected Existing Allotments

Disturbance Type	Total Acres	Percentage of Total Acres
Cleared Land (early successional)	3.10	0.0027
Old Trails (vegetated)	0.31	0.0003
Roads (gravel)	8.60	0.0075
Snowmachine Trails	3.61	0.0031
Structures (houses, outbuildings, etc.)	2.31	0.0020
Unaltered	115,103.46	99.9844
Grand Total:	**115,121.40**	**100.0000**

As of January 2022, the BLM has also received 122 applications for BLM-administered lands as part of the Alaska Native Vietnam Veteran Allotment Program. Forty-one of the applications received request allotments within the 27.5 million acres currently pending environmental review (Table 6).

These land selections are consistent with BLM's expectations as discussed above. Most of the applications received are for lands along natural waterways or that have another type of access but are otherwise remote and have a low likelihood of development based on historical patterns as demonstrated in (Table 5). For instance, selections have been made in remote areas including the Seward Peninsula, off the Noatak River, outside of Valdez, on Biorka Island, King Salmon, outside of Skagway, and other locations.

The BLM has also received some applications adjacent or near major roads in Alaska including the Denali Highway, Richardson Highway, Sterling Highway, and the Old Glenn Highway, all of which have easy access to population centers like Anchorage, Wasilla, and Kenai. However, these parcels encompass nearly all available BLM-managed land along these major roads. In almost every case, these parcels were already selected by either an ANCSA corporation or the State and would only be conveyed if the Native corporation or the State agrees to relinquish their selection. Although unlikely, if a Native Corporation or the State were to relinquish their selection for conveyance under the Dingell Act, conveyed lands near Anchorage/Wasilla are more likely to be developed with a subdivision or to be developed commercially. Sand and gravel development on Native allotments are unlikely on allotments near Anchorage/Wasilla because the State already owns the mineral rights-of-way on routes that would be needed to transport sand and gravel. Very limited options remain that are road accessible.

Table 6: Allotment Applications Received within the 27.5 Million Acres under Consideration for Opening in this EA, by Meridian[1,2]

Kateel River Meridian, Alaska	Copper River Meridian, Alaska	Seward Meridian, Alaska
T. 21 N., R. 18 W., sec. 13.	T. 20 N., R. 15 E., sec. 34.	T. 13 N., R. 1 E., secs. 4 and 5.
T. 21 N., R. 19 W., sec. 1.	T. 1 N., R. 1 W., sec. 1.	T. 15 N., R. 2 E., secs. 6 and 7.
T. 22 N., R. 20 W., sec. 24.	T. 4 N., R. 1 W., sec. 29.	T. 15 N., R. 2 E., secs. 6 and 7.
T. 23 N., R. 18 W., sec. 32.	T. 4 N., R. 8 W., sec. 10.	T. 16 N., R. 1 E., sec. 3.
T. 4 S., R. 30 W., sec. 28.	T. 4 N., R. 8 W., secs. 11 and 14.	T. 16 N., R. 1 E., sec. 3.
T. 6 S., R. 22 W., secs. 28 and 29.	T. 4 N., R. 8 W., sec. 23.	T. 16 N., R. 1 E., secs. 26 and 27.
T. 7 S., R. 11 W., secs. 16, 17, 20, and 21.	T. 13 N., R. 1 W., sec. 18.	T. 16 N., R. 3 E., sec. 5.
T. 7 S., R. 37 W., sec. 26.	T. 13 N., R. 2 W., secs. 13 and 24.	T. 16 N., R. 3 E., sec. 6.
T. 7 S., R. 37 W., secs. 26 and 27.	T. 1 S., R. 7 W., sec. 21.	T. 16 N., R. 3 E., secs. 24 and 25.
T. 18 S., R. 8 W., secs. 8, 16, and 17.	T. 9 S., R. 8 W., sec. 9.	T. 20 N., R. 9 E., secs. 20, 28, and 29.
	T. 9 S., R. 8 W., sec. 16.	T. 20 N., R. 9 E., secs. 20, 28, and 29.
Fairbanks Meridian, Alaska	T. 9 S., R. 8 W., sec. 17.	T. 2 N., R. 12 W., sec. 21.
T. 18 S., R. 8 W., sec. 14.	T. 9 S., R. 8 W., sec. 17.	T. 3 N., R. 11 W., secs. 4 and 5.
T. 21 S., R. 9 E., sec. 34.	T. 9 S., R. 8 E., sec. 9.	T. 3 N., R. 11 W., sec. 4 and 5.
T. 21 S., R. 11. E., secs. 19, 20, and 30.	T. 20 S., R. 10 E., sec. 13	T. 5 N., R. 11 W., sec. 24.
T. 21 S., R. 11. E., sec. 20.	T. 28 S., R. 59 E., secs. 21 and 22.	T. 5 N., R. 11 W., sec. 24.
		T. 6 N., R 11 W., sec. 21.
		T. 24 N., R. 4 W., sec. 17.
		T. 5 S., R. 14 W., sec. 33.
		T. 12 S., R. 43 W., sec. 6.
		T. 14 S., R., 45 W., sec. 5.

3.3 Other Reasonably Foreseeable Future Actions

Reasonably foreseeable future actions are those for which there are existing decisions, funding, formal proposals, or which are highly probable, based on known opportunities or trends. For the purposes of this EA analysis, the BLM presented what is expected to be reasonably foreseeable development as a result of opening approximately 27.5 million acres of land to Native allotment selection (Section 3.2, Projected Development). The BLM has other reasonably foreseeable actions that are similar in nature that would involve the transfer of lands out of Federal ownership. Currently, the BLM is revising the Central Yukon RMP and has prepared the Proposed Central Yukon RMP and Draft EIS; in each alternative the Draft EIS analyzes the impacts of revoking ANCSA Section 17(d)(1) withdrawals on opening approximately 13,275,000 acres of Federal land, including the potential impacts of conveyance of lands selected under the Alaska Native Vietnam Veteran allotment program and State "top filings" that would become effective State selections (Table 7)).[19]

Table 7: Land Under Consideration for Opening in the Proposed Central Yukon RMP/Draft EIS

Land Status	Total Acres[1]
Central Yukon RMP Revision	**13,275,000**
Potentially Available Lands after PLO Revocation	5,323,000
Potentially Available Lands after PLO Revocation - Native Selection	50,000
Potentially Available Lands after PLO Revocation - State Selection	7,329,000
Potentially Available Lands after PLO Revocation - Native and State Selection[2]	573,000

Notes: [1] Acres are rounded to the nearest 1,000 acres and based on data managed in a GIS. These data are approximations only and acres reported within text and tables in this EA may vary slightly than actual acres; differences are due to data origination and are inconsequential to analysis within this EA.

[2] Some land under consideration for opening are selected by both the State and a Native Corporation. For the purposes of this analysis, it makes no difference; an eligible individual would still need to obtain a relinquishment from the first selectee.

[19] Selections could occur on lands within the Central Yukon RMP area only if those lands were opened to allotment selection before December 2025.

In addition to these potential ANCSA Section 17(d)(1) withdrawal revocations, other Federal lands in Alaska are currently available to allotment selection now (See Section 1.0, Summary of Proposed Project). There are approximately 1.2 million acres currently available within the Fortymile, Bering Glacier, and Goodnews Bay planning areas (Table 8).

Table 8: Land Currently Available to Native Allotment Selection by Land Status

Land Status	Total Acres[1]
Currently Available Lands	397,000
Native Selection	39,000
State Selection	476,000
Native and State Selection[2]	300,000
Grand Total:	**1,214,000**

Notes: [1] Acres are rounded to the nearest 1,000 acres and based on data managed in a GIS. These data are approximations only and acres reported within text and tables in this EA may vary slightly than actual acres; differences are due to data origination and are inconsequential to analysis within this EA.

[2] Some land under consideration for opening are selected by both the State and a Native Corporation. For the purposes of this analysis, it makes no difference; an eligible individual would still need to obtain a relinquishment from the first selectee.

3.4 How would opening lands to allotment selection affect individual and community rights to subsistence uses in Alaska? How would public access changes resulting from potential allotment selections affect subsistence use?

3.4.1 Affected Environment

Subsistence is a traditional way of life for rural Alaskans, both Native and non-Native, and is essential to the physical, economic, and social existence for those engaged in the practice. Section 804 of the Alaska National Interest Lands Conservation Act (ANILCA) provides for a priority consumptive use of fish and wildlife on Federal public lands by rural Alaska residents over other uses (e.g., commercial or recreational uses). Section 811 of ANILCA also ensures reasonable access to subsistence resources by rural Alaska residents. Priority use and means of access give rural Alaska residents the opportunity to harvest subsistence resources on Federal public lands, even in times of resource shortages.

The Federal Subsistence Board (Board), made up of the Regional or State Directors of USFWS, BLM, BIA, and National Park Service, along with three rural resident members, provides for a subsistence priority in several ways, including longer seasons and more liberal harvest limits than allowed under State regulations. The Board can also close Federal public lands to non-federally qualified users for reasons of conservation, to allow for the continuation of subsistence uses, or for reasons of public safety or administration.

Unless specifically closed to non-federally qualified users, Federal public lands and waters are open to these users hunting, fishing, or trapping under State regulations. However, even in Federal public lands in which this dual management regime is allowed, the Federal subsistence priority remains. It is important to note, however, that this priority of use only applies to Federal public lands and waters. All other lands and waters are governed by State regulations.

3.4.1.1 Relevant Subsistence Resources

Kobuk-Seward Peninsula Planning Area

The primary subsistence resources accessed in or from the planning area are marine mammals (bowhead whale, beluga, bearded seal, ringed seal, harbor seal, and walrus), migratory waterfowl, fish, caribou, moose, and muskoxen. Additionally, small mammals such as ground squirrel, Arctic hare, snowshoe hare, and muskrat are used both for their meat and fur. Other animals harvested from the planning area include porcupine, martin, red fox, white fox, wolverine, weasel, mink, river otter, wolf, lynx, marmot, ground squirrel, hare, grizzly bear, polar bear, and mountain sheep (Kobuk-Seward Peninsula RMP FEIS, 2008, Chapter 3, Section F).

Subsistence continues to be an important activity for residents of the planning area. The incorporation of new technologies (e.g., snowmachines, off-highway vehicles, gas-powered boats) has allowed subsistence users to access larger areas of land more efficiently, permitting them to engage in a cash-based economy while also participating in a subsistence way of life. Additionally, residents continue to travel to seasonal camps for specific subsistence activities (BLM 2008, Chapter 3, Section F).

Competition between subsistence users and sport hunters continues to be an issue of concern for many residents. Within the lands under consideration, the Squirrel River SRMA has seen increasing numbers of outside hunters, which has led some federally qualified subsistence users to be excluded from engaging in traditional subsistence activities. Over the last several years, the Federal Subsistence Board has enacted regulatory actions to address these conflicts specific to caribou (e.g., spatially explicit closures to non-federally qualified users), but user conflicts persist, and residents have expressed concerns that activities associated with outside hunters are deflecting the migratory patterns of the WACH from its traditional migratory corridors (OSM 2021a).

Ring of Fire Planning Area

Subsistence harvest of resources is an important source of nutrition for rural communities in the Ring of Fire planning area. Alaska Department of Fish and Game (ADF&G) estimated that the annual wild food harvest in the southwest-Aleutian region of Alaska was approximately 5,114,522 pounds or 373 pounds per person per year; the annual wild food harvest in the Kodiak region was approximately 2,061,607 pounds or 155 pounds per person per year; the annual wild food harvest in the Southeast region was approximately 5,064,509 pounds or 178 pounds per person per year; and the annual wild food harvest in the Southcentral region was approximately 1,688,467 pounds or 153 pounds per person per year (ADF&G 2000b). Subsistence harvest levels vary widely from one community to the next, from year to year, and on a seasonal basis (Ring of Fire RMP FEIS, 2006, Subsistence Section 3.5.6).

For the 22 communities in the Alaska Peninsula/Aleutian Chain region, there are a diverse array of species available including marine mammals, terrestrial mammals, fish, birds, and other resources. Subsistence resources on the upper Alaska Peninsula include the caribou from the Northern Alaska Peninsula caribou herd, moose, brown bears, small mammals (e.g., porcupine, red fox, beavers, wolves, wolverines, lynx, hares, and river otters), sea mammals (e.g., harbor seals, Steller sea lions, and sea otters), migratory waterfowl, salmon, and freshwater fish. Fish, both salmon and non-salmon species, are important to subsistence users, with an average of 88 percent of households harvesting these species. Vegetation is also an important subsistence resource with 81 percent of households harvesting these species, along with birds and eggs (65 percent), marine invertebrates (63 percent), and large land mammals (41 percent) (Ring of Fire RMP FEIS, 2006, Subsistence Section 3.5.6, Table 3.5-18). Most of the seasonal harvest of subsistence resources is centered around the availability of fish, primarily salmon.

The 10 communities in the Kodiak region utilize marine mammals, salmon, non-salmon fish, and some species of land mammals as the primary available subsistence resources. Fish, both salmon and non-salmon, are an important subsistence resource to residents, with 88 percent of households harvesting these species. Vegetation is also an important resource, with 86 percent of households harvesting these species, along with marine invertebrates (65 percent), and large land mammals (52 percent) (BLM 2006b, Section 3.5.6, Subsistence, Table 3.5-23). Seasonal subsistence harvest depends on the availability of resources and subsistence regulations.

The 36 communities in the Southcentral region have a diverse range of subsistence resources available for harvest, including large salmon runs, non-salmon marine and freshwater fish, marine mammals, and intertidal invertebrates. Large terrestrial mammals such as moose, caribou, deer, bear, and mountain sheep and goats provide additional resources. Fish, both salmon and non-salmon, are an important subsistence resource to residents, with 79 percent of households harvesting these species. Vegetation is also an important resource, with 84 percent of households harvesting these species, along with marine invertebrates (35 percent), birds and eggs (32 percent), and large land mammals (27 percent) (BLM 2006b, Section 3.5.6, Subsistence, Table 3.5-27). Seasonal harvest in coastal communities of this region involve similar subsistence resources but with species being harvested at different times or with differing levels of effort and emphasis.

The 31 communities in the Southeast region have large runs of five salmon species, nearshore and offshore fishing for salmon and non-salmon fish species, marine mammals like seals and sea lions, intertidal resources including clams, crabs, seaweeds, and octopus, and upland resources such as bear and deer, are the main subsistence resources for area residents. Fish, both salmon and non-salmon, are an important subsistence resource to residents, with 77 percent of households harvesting these species. Vegetation is also an important resource, with 79 percent of households harvesting these species, along with marine invertebrates (55 percent) and large land mammals (44 percent) (BLM 2006b, Section 3.5.6, Subsistence, Table 3.5-32). Seasonal harvesting of subsistence resources is differentiated between coastal and riverine communities reflecting differences in resource availability and timing of harvest.

Assuming that land-based disturbances associated with allotment conveyance are well distributed among the affected planning areas, terrestrial subsistence species are not likely to be affected by the Proposed Action. As indicated in the Wildlife, Habitat and Special Status Species Section (Appendix B, Table 13), because the Proposed Action is to be limited to terrestrial disturbance, marine mammals used for subsistence in the relevant planning areas are not expected to be affected.

Bay Planning Area

Salmon and freshwater fish are the primary resource for subsistence users in the planning area, with caribou and moose also being dominant subsistence species. In addition to these, upland game, black/ grizzly bears, furbearers, and waterfowl are also important subsistence species, but of lesser importance in terms of biomass harvested for food and fiber compared to the most dominant species. Much of the Bristol Bay region is also dominated by commercial salmon fishing and because of this, subsistence activities are closely tied to the seasonal harvest of these resources (BLM 2007a, Chapter 3, Section F).

Caribou are second in importance only to salmon in terms of subsistence diet of residents of the planning area. The BLM lands in the planning area provide prime caribou habitat and caribou harvest in the region, and between 1983–2002, in Game Management Units 9 and 17, comprised approximately 25 percent of all the caribou harvested in the state, even though the area is largely roadless (BLM 2007a, Chapter 3, Section B6, Fish and Wildlife).

The Mulchatna Caribou Herd (MCH) has experienced dramatic changes in population size and distribution in the past 40 years. In the early 1980s, the population was estimated to include

approximately 20,000 caribou. By the mid-90s, the herd had grown to its peak size of approximately 200,000 caribou. The most recent estimates, obtained in July 2019 and 2020, show that the population is less than half of the State's minimum population objective (30,000 animals) at 13,448 caribou. The reasons for the decline are uncertain, but represent a real concern for this important subsistence species. The Federal Subsistence Board has taken several recent regulatory actions to try to slow the decline, including shortening the season, providing for a bull-only harvest, and delegating management authority to land managers to make in-season management decisions to conserve the MCH (OSM 2021b).

Bering Sea-Western Interior Planning Area

Communities use large portions of the planning area to harvest resources for subsistence, with overlapping use areas between communities. Subsistence activities follow a seasonal pattern that varies from year to year and between communities, based on local traditional knowledge and observations of resources, river and weather conditions, and migratory patterns. Rural residents harvest fish, wildlife, and vegetation resources as a major part of their diet, with river communities tending to harvest larger numbers of fish (primarily salmon), whereas other communities harvest more moose, caribou, and non-salmon fish, and there are extensive sharing networks between Kuskokwim and Yukon River communities (BLM 2020, Subsistence Section 3.5.2).

The summer of 2021 saw very low returns of Chinook Salmon and record low returns of Chum Salmon in the Yukon River, along with similarly low returns of both salmon species on the Kuskokwim River (Carroll 2021, Blihovde 2021). This loss of a traditional subsistence resource was felt far and wide across this RMP and may have long-term consequences for subsistence users in the region.

East Alaska Planning Area

In terms of pounds of edible resources harvested, fish provided the greatest bulk, followed by game, unidentified vegetation, berries, and greens and mushrooms in the East Alaska RMP area. Averages varied greatly between the 18 communities in the planning area, with 12 communities relying more heavily on fish and 6 relying more on game to provide the bulk of their subsistence resources. Use of subsistence resources in the planning area is highly dependent on the seasonal availability and abundance of fish and wildlife populations, with communities taking resources during time periods and locations most conducive to efficient harvest. Other factors influencing harvest patterns include climate, human population density, harvest pressure, and accessibility (BLM 2006a, Chapter 3, Section H).

As in other planning areas, there have been user conflict issues between federally qualified subsistence users and sport hunters in the planning area. Much of this is a result of accessibility to hunt areas due to the exiting road system, specifically in Game Management Unit 13 (located in Southcentral Alaska). On July 16th, 2020, the Federal Subsistence Board closed Units 13A and 13B to the harvest of moose and caribou by non-federally qualified users for the 2020/2022 regulatory cycle, citing public safety and continuation of subsistence uses. Issues related to overcrowding, disruption of hunts, and serious hunter safety concerns all played a role in the decision (OSM 2020).

3.4.1.2 Analytical Methods and Techniques

The relevant unit of measurement used in this analysis is *acres of land*; specifically, the acres of land potentially conveyed to allotment owners. Acreage is an appropriate analysis unit because it helps to describe the geographic scale of the potential removal of Federal public lands subject to Federal subsistence regulations. This is because both issues identified for subsistence relate to the ability of non-allotment owners to use and access lands for subsistence under Federal regulations. Any lands conveyed to allotment owners would no longer be considered Federal public lands in which Federal subsistence regulations apply. Because it is unknown how many acres of land each of the 3,000 potential allotment owners might have conveyed to them, for the purposes of this analysis, it is assumed that each allotment

conveyed will be of the maximum acreage allowed (160 acres), so that the maximum number of acres conveyed under the Proposed Action would be 480,000 acres. Additionally, it is assumed that all other Federal public lands in each planning area are subject to Federal subsistence regulations as described in ANILCA and in 50 CFR 100.

As previously mentioned, there are some Federal lands that would not be subject to Federal subsistence regulations including military lands and some sections of pre-ANILCA parklands, such as Katmai National Park within the Bay RMP. However, due to the broad land base and coarse scale of this analysis, more specific acreage is not needed to convey the degree to which conveyance of land may or may not affect subsistence uses and access by federally qualified subsistence users.

To further describe the scale of potential effects of conveyance of Federal lands, this analysis will include a description of the total acreage of all Federal public lands in each RMP planning area, not just those of the BLM. This is important because the lands subject to this EA are only those under BLM management, and any other Federal public lands managed by other Federal agencies would still be available to rural Alaska residents under Federal subsistence regulations.

3.4.2 Environmental Effects—No Action Alternative

Lands would remain withdrawn under ANCSA Section 17(d)(1) and there would be no impact to individual or community rights to subsistence uses in the lands under consideration. These lands would therefore remain Federal public lands as described in ANILCA Section 102 and 50 CFR 100.3(d) and subject to Federal subsistence regulations. Additionally, since no lands would be conveyed to allotment holders, there would be no change in public access to these lands, and federally qualified subsistence users would be able to utilize and travel on these lands while engaged in subsistence hunting, trapping, and fishing.

3.4.3 Environmental Effects—Alternative B (Proposed Action)

Under the Proposed Action, approximately 27.5 million acres of ANCSA Section 17(d)(1) PLOs within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas would be opened to selection of Native allotments by eligible individuals pursuant to Section 1119 of the Dingell Act. The BLM estimates that up to 3,000 eligible individuals may qualify for allotments under the program. The maximum number of acres that each allotment can be is 160 acres, which would translate into a maximum of 480,000 acres of Federal public lands currently under BLM management being conveyed, or approximately 1.7 percent of the 27.5 million acres that would be opened to selection under this alternative.

There are approximately 9.8 million acres of land potentially available for selection in the Kobuk-Seward Peninsula Planning Area. However, of this total, approximately 2.3 million acres consists of land selected by the State and Native Corporations for which the State or Native Corporation would have to agree to relinquish their selection before an allotment could be conveyed to an eligible individual. Assuming that all 9.8 million acres in this planning area would be available for selection and if all the lands chosen for selection are only in this area as well, this would translate into a maximum of 4.8 percent of lands becoming unavailable for use under Federal subsistence regulations. However, there are approximately 15.6 million total acres of Federal public lands in the planning area. Assuming that all this land is subject to Federal subsistence management, then only 3 percent of the total land in the planning area would be unavailable for subsistence use and access if all potential allotment selections occurred here.

There are approximately 822,000 acres of land potentially available for selection in the Ring of Fire Planning Area. However, of this total, approximately 430,400 acres consists of land selected by the State

and Native Corporations for which the State or Native Corporation would have to agree to relinquish their selection before an allotment could be conveyed to an eligible individual. Assuming that all 822,000 acres in this planning area would be available for selection and if all the lands chosen for selection are only in this area as well, this would translate into a maximum of 58 percent of lands becoming unavailable for use under Federal subsistence regulations. However, there are approximately 39 million total acres of Federal public lands in the planning area. Assuming that all this land is subject to Federal subsistence management, then only 1.2 percent of the total land in the planning area would be unavailable for subsistence use and access if all potential allotment selections occurred here.

It is unlikely that all land selections would take place within a single planning area. Because of this, the amount of affected acreage as described in this section for each RMP is likely to be much lower, as impacts are expected to be more widely distributed among all the potentially affected planning areas in this EA. Given the maximum number of acres of land that could be conveyed to allotment owners relative to the number of acres of Federal public lands available for a Federal subsistence priority in each planning area, the BLM expects effects to individual or community rights to subsistence or access to subsistence resources to be negligible.

There are approximately 1.3 million acres of land potentially available for selection in the Bay Planning Area. However, of this total, approximately 243,000 acres consists of land selected by the State and Native Corporations for which the State or Native Corporation would have to agree to relinquish their selection before an allotment could be conveyed to an eligible individual. Assuming that all 1.3 million acres in this planning area would be available for selection and if all the lands chosen for selection are only in this area as well, this would translate into a maximum of 36.9 percent of lands becoming unavailable for use under Federal subsistence regulations. However, there are approximately 9.4 million total acres of Federal public lands in the planning area. Assuming that all this land is subject to Federal subsistence management, then only 5.1 percent of the total land in the planning area would be unavailable for subsistence use and access if all potential allotment selections occurred here.

There are approximately 13.4 million acres of land potentially available for selection in the Bering Sea-Western Interior Planning Area. However, of this total, approximately 2.7 million acres consists of land selected by the State and Native Corporations for which the State or Native Corporation would have to agree to relinquish their selection before an allotment could be conveyed to an eligible individual. Assuming that all 14.7 million acres in this planning area would be available for selection and if all the lands chosen for selection are only in this area as well, this would translate into a maximum of 3.5 percent of available lands becoming unavailable for use under Federal subsistence regulations. However, there are approximately 31.5 million total acres of Federal public lands in the planning area. Assuming that all this land is subject to Federal subsistence management, then only 1.5 percent of the total land in the planning area would be unavailable for subsistence use and access if all potential allotment selections occurred here.

There are approximately 2.4 million acres of land potentially available for selection in the East Alaska Planning Area. However, of this total, approximately 2.2 million acres consists of land selected by the State and Native Corporations for which the State or Native Corporation would have to agree to relinquish their selection before an allotment could be conveyed to an eligible individual. Assuming that all 2.4 million acres in this planning area would be available for selection and if all the lands chosen for selection are only in this area as well, this would translate into a maximum of 20 percent of available lands becoming unavailable for use under Federal subsistence regulations. However, there are approximately 18.3 million total acres of Federal public lands in the planning area. Assuming that all this land is subject to Federal subsistence management, then only 2.6 percent of the total land in the planning area would be unavailable for subsistence use and access if all potential allotment selections occurred here.

3.4.3.1 Reasonably Foreseeable Actions

Because the allotment sizes are small relative to the number of acres of Federal public lands available for a Federal subsistence priority in each planning area, and allotment selections are expected to be dispersed, effects of the Proposed Action, when considered with other reasonably foreseeable future actions as described in Section 3.3, are also expected be negligible.

3.4.4 Environmental Effects—Alternative C

The land subject to selection under this alternative is approximately 25.0 million acres. Effects to subsistence use and access under this alternative would be substantially similar to those under the Proposed Action, except that the total acreage expected to be made unavailable to federally qualified subsistence users because of conveyance, relative to the total amount of acres subject to a Federal subsistence priority, would be smaller.

3.5 How would opening lands to allotment selection affect local water quality and aquatic habitat conditions, particularly anadromous fish habitats?

3.5.1 Affected Environment

The types of water and aquatic resources within Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas described in this section range from small tundra ponds and wadable streams to large lake complexes and boatable rivers. Fish species diversity varies depending on the type of aquatic habitat and location in the watershed and includes both resident and anadromous species. Riparian and wetland resources, including floodplains, also exhibit a high degree of variability across this large project area with the largest and most diverse riparian and wetland communities located within broad alluvial valleys with well-developed floodplains. These systems are described in more detail within the regionally focused RMPs, which are incorporated by reference.

3.5.2 Environmental Effects—No Action Alternative

Under Alternative A, management of BLM-administered land under consideration for opening to allotment selection the within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas would continue to be withdrawn under existing PLOs.

3.5.3 Environmental Effects—Alternative B (Proposed Action)

In addition to using the methodology and assumptions described in Section 3.1, this analysis includes an examination of the entire Alaska Native Allotment dataset to explore the relationship between allotments and proximity to rivers, streams, and floodplains. Flow lines from the National Hydrography Dataset (NHD, USGS 2019), which represent all stream and river segments in Alaska, were utilized and buffered to approximate the 100-year floodplain extent[20]. Given the difficulty of remotely mapping the 100-year floodplain, stream buffer distances are used as a proxy in this analysis. Buffer distances are given as a distance from the NHD flowline based on stream size as indicated by Strahler stream order (Strahler 1952). Buffer distances are as follows:

- 1st and 2nd Order Streams – 100-foot buffer

[20] The 100-year floodplain is defined by the area subject to flooding by the 1 percent annual chance flood (McCuen 2005) and is used to assess potential impacts consistent with the Executive Order on Floodplain Management (EO 11988) per DOI policy (US DOI 2020).

- 3rd Order Streams – 500-foot buffer
- 4th and 5th Order Streams – 1,000-foot buffer
- 6th, 7th, 8th, and 9th Order Streams – 1,500-foot buffer

These buffer distances, developed from professional judgment and field surveys, are likely to approximate the 100-year floodplain extent and serve as a reasonable basis for assessing potential floodplain related resource impacts across a large project area. Using the 100-year floodplain delineation, approximately 79.2 percent of the existing Alaska Native Allotments (12,883 of the 16,269) were found to be located within this flood zone. These results suggest that it is reasonable to expect future selections to be located in proximity to rivers and streams.

Understanding the relationship of existing allotments to sensitive fish habitats (e.g., spawning areas) is a key aspect of potential impact analysis. Using data from the Anadromous Waters Catalogue (Giefer and Blossom 2021), an analysis was completed to identify existing allotments that include or are located in close proximity (within 500 feet) to spawning habitat. Section 3.1, Methodology and Assumptions, described that the BLM expects that most allotments would be used for subsistence fishing and hunting; therefore, it was anticipated that allotment locations would not be near spawning habitats where the quality of the fish (e.g., salmon) is significantly reduced. The results of the analysis confirmed these assumptions finding spawning habitats within only 113 allotments (0.69 percent) and in proximity to 544 allotments (3.34 percent). Existing allotments within close proximity (within 500 feet) of essential fish habitat (EFH) lakes was also completed. The results of this analysis found that only 14 allotments (0.09 percent) were in close proximity to EFH lake habitats.
The nature and extent of impacts to water and aquatic resources from human disturbance is largely based on site conditions (e.g., slope, vegetative cover, soil type), rainfall, nature of the disturbance activity, and presence and effectiveness of sediment and erosion abatement. Analysis of potential impacts will use the spatial extent and type of land uses identified on the subset of existing allotments as a projection of future uses on conveyed allotments (Section 3.2, Project Development, Table 5). The percent of stream shoreline impacts and percent of land with surface disturbances associated with roads, all-terrain vehicle (ATV) trails, and houses or cabins will be the measures to quantify potential impacts to water resources and aquatic habitats.

Based on analysis of existing allotments, it is likely that most selections (>80 percent) would be within the 100-year floodplain of rivers and streams. It is unlikely that selections would be in close proximity to lakes used by anadromous fish species. Selections outside of this area would have no measurable effect on water quality or aquatic resources, especially considering the limited surface disturbance expected to occur following conveyance of the land. Conveyed lands within the 100-year floodplain would have the potential for increased surface erosion and runoff based on human-caused surface disturbing activities such as land clearing, road or trail development, and the construction of homes, cabins, and outbuildings. Based on an analysis of past surface disturbance within a random subset of existing allotments, only 25 of 163 allotments exhibited signs of human-caused surface disturbance.

Most disturbances were associated with allotments that were located adjacent to existing road networks and communities; however, these allotments were also most often located outside of a 100-year floodplain and as a result would be expected to have minimal influence on aquatic resources and water quality. Additionally, allotments located in proximity to communities where subdivisions and more extensive development are likely would be subject to requirements of the Construction General Permit (CGP). CGPs are issued by the Alaska Department of Environmental Conservation (ADEC) and authorize storm water discharges from large and small construction-related activities that result in a total land disturbance of equal to or greater than 1 acre and where those discharges enter waters of the U.S. The goal of the CGP is to minimize erosion and reduce or eliminate the discharge of pollutants through

implementation of appropriate control measures. These control measures are typically outlined in a project specific Storm Water Pollution Prevention Plan (SWPPP) which is required for projects disturbing more than 1 acre within the Municipality of Anchorage, Fairbanks North Star Borough, City of Fairbanks, City of North Pole, Joint Base Elmendorf-Richardson, Port of Anchorage, and Fort Wainwright. Outside of these areas SWPPPs are required for proposed construction activities disturbing more than 5 acres. Requirements of the CGP would be expected to minimize short- and long-term impacts to water quality and aquatic habitats from surface disturbing activities greater than 5 acres. Additional permitting requirements from the U.S. Army Corp of Engineers and State of Alaska would further minimize impacts to wetlands and streams consistent with the Clean Water Act and Alaska statutes. Some long-term impacts from development may remain and would be closely linked to increased levels of impervious surfaces and concentrated flow paths (e.g., drainage ditches, road beds, etc.) which accelerate runoff and reduce infiltration of precipitation. Increased runoff contributes to soil erosion and can carry a variety of pollutants to nearby waterbodies, thereby affecting aquatic resources and local water quality. The scope and extent of long-term impacts is difficult to predict but would likely be low given current design and construction standards related to roads, ditches, and subdivisions.

Most Alaska Native Allotments would be expected to have minimal land development (less than 5 acres of surface disturbance) based on GIS analysis using a subset of existing allotments (163 of 16,292). Only 25 of the randomly selected 163 existing allotments were found to have any evidence of human disturbance based on an assessment using high resolution aerial imagery (ESRI 2021). This assessment also found that the extent of disturbance activities (e.g., roads or trails, structures, etc.) averaged less than 1.5 acres with only 1 of the 25 allotments having more than 5 acres of total disturbance. Narrowing the analysis to only allotments within the 100-year floodplain found that the extent of disturbance activities (e.g., roads or trails, structures, etc.) averaged less than 0.7 acres with no allotments having more than 5 acres of total disturbance. Overall, human disturbance on a randomly selected subset of existing allotments located within the 100-year floodplain was found to average less than 1 acre and affect less than 1 percent of each allotment's overall extent. No stream shoreline impacts were noted during the assessment of existing allotments.

In conclusion, the GIS analysis of randomly selected allotments found no discernible impacts to stream shorelines and low levels of human disturbance on allotments located within the 100-year floodplain. In addition, an examination of the entire Native Allotment dataset using GIS found minimal overlap between allotments and sensitive aquatic habitats (i.e., anadromous spawning areas). Using the GIS analysis results of both the random subset and entire Native Allotment data, suggests that minimal levels of human disturbance would be expected. The largely intact vegetation community within these areas would further minimize opportunities for surface erosion from limited development areas to impact adjacent water bodies and aquatic habitats. These results suggest that the potential negative effects to local water quality and aquatic resources are likely to be minimal if future land use practices remain similar in scope and scale to historic use levels.

3.5.3.1 Reasonably Foreseeable Future Actions

When considered with other reasonably foreseeable future actions as described in Section 3.3, there would be no measurable effects beyond what is described under Alternative B.

3.5.4 Environmental Effects—Alternative C

Under this alternative, slightly fewer acres of land would be made available for conveyance as Native Alaska Veterans Allotments. The effects of implementing this alternative would be the same as those described under Alternative B.

3.6 How would opening lands to allotment selection affect riparian and wetland habitat conditions as well as floodplain function?

3.6.1 Affected Environment

The affected environment for riparian and wetland habitat is the same as the affected environment for local water quality and aquatic habitat conditions, described in Section 3.5.1, Affected Environment.

3.6.2 Environmental Effects—No Action Alternative

Under Alternative A, management of BLM-administered land under consideration for opening to allotment selection the within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas would continue to be withdrawn under existing PLOs.

3.6.3 Environmental Effects—Alternative B (Proposed Action)

The analysis used to assess potential effects to water quality and aquatic resources was based on the premise that increases in the extent and proximity of surface disturbing activities to water bodies strongly relates to increases in potential negative impacts to water quality and aquatic resources. This relationship is similar for riparian and wetland resources and floodplain functions. Vegetation clearing and development activities (road/trail building, house construction) alter local surface hydrology and soil moisture characteristics. These changes result in the loss or partial loss of wetland/riparian vegetation communities depending on the magnitude and type of human disturbance. Floodplains provide essential ecosystem services across a range of physical and biological processes, as well as providing other benefits to society in general. An extensive review and summary of floodplain benefits can be found in U.S. FEMA (2002). EO 11988 requires Federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. Guidance for complying with the EO is outlined in Departmental Manual Part 520 (U.S. DOI 2020) and the Water Resource Council Floodplain Management Guidelines for Implementing EO 11988. This guidance includes an eight-step process that agencies should carry out as part of their decision-making on projects that have potential impacts to or within the 100-year floodplain. The eight steps, which are summarized below, reflect the decision-making process required in Section 2(a) of the EO:

1. Determine if a proposed action is in the base floodplain (area with a one percent or greater chance of flooding in any given year).
2. Conduct early public review, including public notice.
3. Identify and evaluate practicable alternatives to locating in the base floodplain, including alternative sites outside of the floodplain.
4. Identify impacts of the Proposed Action.
5. Minimize threats to life and property and to natural and beneficial floodplain values.
6. Reevaluate alternatives.
7. Issue findings and a public explanation.
8. Implement the action (520 Department Manual DM 2.6(B)).

Based on the GIS analysis of existing Native Allotments, it is reasonable to conclude that most future allotments would be located in the 100-year floodplain. Initial public scoping for this project did not

identify concerns related to floodplain functions. No practical alternatives exist for locating allotments outside of the 100-year floodplain given that the primary usage of these lands, which strongly relates to subsistence hunting and fishing, is inherently linked to being in close proximity to streams and rivers. Impacts to natural and beneficial floodplain values are expected to be limited based on historic land use patterns on Native Allotments in Alaska. Similar to previous analysis related to the effects on water quality and aquatic resources, potential impacts to floodplain habitats and functions are expected to be minimal. Impacts are expected to include some conversion of riparian/wetland vegetation to other vegetation types or into features such as roads, trails, houses, etc. The greatest impacts to these vegetation communities and floodplains would be in areas connected to road networks and adjacent to existing communities; however, these situations are expected to be limited. Based on an analysis of a subset of existing allotments within the 100-year floodplain, the extent of potential vegetation changes on individual allotments is most likely to be less than 1 acre and affect less than 1 percent of the allotment's overall extent (average allotment size of the subset within the 100-year floodplain was 73.6 acres). In conclusion, the limited development within these allotments would not be expected to measurably diminish floodplain functions or the benefits that they provide.

3.6.3.1 Reasonably Foreseeable Actions

At the landscape scale, riparian/wetland vegetation and floodplain resources are likely to be unaffected by slight incremental increases in human disturbance as a result of allotment conveyance to Native Alaska Veterans, based on past, present, and reasonably foreseeable future actions, within the largely undeveloped project area.

3.6.4 Environmental Effects—Alternative C

Under this alternative, slightly fewer acres of land would be made available for conveyance as Native Alaska Veterans Allotments. The effects of implementing this alternative would be the same as those described under Alternative B.

3.7 How would opening lands to allotment selection affect cultural resources?

3.7.1 Affected Environment

Cultural resources are locations of human activity, occupation, or use identifiable through field inventory, historical documentation, or oral evidence. Cultural resources include both archaeological and historic architectural resources, and may include sites, structures, buildings, objects, artifacts, works of art, architecture, and natural features that were important in past human events. They may consist of physical remains or areas where significant human events occurred, even though evidence of the events no longer remains. They may include definite locations of traditional, cultural, or religious importance to specified social or cultural groups.

Many types of cultural resources may be found on BLM-administered lands in Alaska. These resources are associated with a wide variety of cultures and social groups and span a timeframe from at least 14,000 years ago through the present. Additional details for the cultural resource types, themes, and eras represented within the project area are included in each of the five RMPs encompassing the project area; these RMPs are incorporated by reference.

Based on information provided in the Alaska Heritage Resources Survey database (AHRS), there are 761 known cultural resources within the approximately 27.5 million acres area being analyzed for opening to allotment selection in this EA. Table 9 provides a breakdown of resources by RMP area. However, this

number likely reflects only a small fraction of the total cultural resources encompassed by the project area as most of the land has not been surveyed. Numbers reflected in Table 9 may also appear low because many cultural sites were likely conveyed out of Federal ownership through ANCSA conveyance.

Known cultural resource distribution is primarily influenced by areas where systematic archaeological survey and research has been conducted. Due to the remote nature and sheer quantity of land parcels within the project area, less than 1 percent has been subject to systematic archaeological survey and research. Areas that have been subject to such survey and research tend to be concentrated in urban areas, where development occurs more frequently (e.g., near cities or villages, transportation corridors, mining areas, and military bases), and areas that are more easily accessible (e.g., riverine and coastal areas accessible by boat or areas accessible by road). Accordingly, the majority of known cultural resources within the approximately 27.5 million acres are in more accessible areas. As noted in Section 3.2, Project Development, these areas are also those most likely to be selected as part of the Allotment Program. Nevertheless, based on known distribution of people throughout Alaska in both precontact and historic eras and in consideration of the total number of known cultural resources recorded in the AHRS database, it is assumed, for the purposes of this analysis, that there is potential for additional unrecorded cultural resources to exist across the entire project area.

In its consideration of impacts to cultural resources, the BLM is required to meet its obligations under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations at 36 CFR 800. Section 106 requires federal agencies to consider the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) the opportunity to comment on such undertakings.

While Section 106 compliance addresses a subset of cultural resources known as historic properties (those listed on or eligible for listing on the National Register of Historic Places (NRHP), NEPA takes a broader approach and addresses both cultural resources and historic properties. Accordingly, the discussion presented below is not limited only to historic properties and includes potential impacts to cultural resources, known and unrecorded, regardless of their NRHP eligibility.

Table 9: Cultural Resource Sites within the Approximately 27.5 Million Acres Under Consideration for Opening to Allotment Selection, according to AHRS[1]

Resource Management Plan	Number of Known Cultural Resources
Kobuk Seward	260
Bering Sea Western Interior	113
Ring of Fire	45
Bay	10
East Alaska	333

3.7.1.1 Analytical Methods and Techniques

Data for this analysis was compiled using the Alaska Office of History and Archaeology's AHRS database (ADNR 2020). This digital database includes tabular and geospatial data for known cultural resources in Alaska. Using the most recent AHRS data available, the BLM used GIS to identify known cultural resources within the approximately 27.5 million acres under consideration for opening to allotment selection. These data were then reviewed by archaeologists in the Anchorage and Glennallen Field Offices and evaluated based on the BLM's desire to retain the resource in Federal management. The evaluation was completed using a numerical ranking system including the following categories:

1 - resource is not cultural, no longer exists

2 - resource is not a priority for retention (e.g., site may not have a determination of eligibility (DOE) on the NRHP and is of a type unlikely to meet significance criteria/ retain integrity; or

has been determined not eligible for the NRHP)

3 - resource is a priority for retention (e.g., site may not have a DOE and is of a type that might meet significance criteria and / retain integrity)

4 - resource must be retained (e.g., site is eligible for the NRHP, listed, or serves an important administrative function for the BLM or potentially another owner)

Of the 761 unique, known cultural resources, 339 of these, or approximately 44 percent of all known resources within the project area, were identified in categories 3 and 4 and would be resources for retention. Resources that would be retained in Federal management generally fall into one of the following categories:

- sites that are eligible for or listed on the NRHP eligible, part of NRHP eligible districts, National Historic Landmarks, National Historic Trails
- sites with known or high potential for human remains
- sites identified as having traditional religious or cultural significance to tribes
- sites that include buildings, facilities, spaces that serve a current function to the BLM for which no DOE has been prepared but which are of a type and condition likely to meet criteria of significance and retain sufficient integrity to be eligible
- sites that have a demonstrated high potential for important archaeological or historical data for which no DOE has been prepared but which are of a type and condition likely to meet criteria of significance and retain sufficient integrity to be eligible

While only those sites that have been determined eligible for or listed on the NRHP are properly termed historic properties under 36 CFR 800.16(l)(1), all sites within the categories listed above retain important scientific, historical, or cultural values.

Analytical Assumptions

1. Unrecorded cultural resources exist within the 27.5 million areas of BLM land under consideration to be opened to allotment selection.
2. The BLM will not open lands for allotment selection within a minimum of a quarter mile of certain cultural resource sites, including lands which were applied for under Section 14(h)(1) of ANCSA and known cultural resources ranked as a 3 or 4 priority for retention as described in Section 3.7.1.1, Analytical Methods and Techniques (See Section 2.2.1). The BLM would not open lands for selection within a minimum of 500 feet of the Iditarod National Historic Trail.

3.7.2 Environmental Effects—No Action Alternative

Under the No Action Alternative, management of BLM-administered lands would continue to be managed under existing PLOs for the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea Western Interior, and East Alaska planning areas. All 761 known cultural resources, as well as all unrecorded resources within the project area, would remain under Federal ownership, subject to Federal historic preservation laws and EOs, and would continue to be managed consistent with cultural resource management objectives of the approved land use plans.

3.7.3 Environmental Effects—Alternative B (Proposed Action)

All known historic properties, lands which were applied for under Section 14(h)(1) of ANCSA, and sites identified by the BLM as otherwise retaining important scientific, historical, or cultural value (339

cultural resources) would be excluded from selection under this alternative and would remain under Federal ownership thereby avoiding adverse effects to known historic properties. Nevertheless, the Proposed Action could still result in direct impacts and indirect impacts to other known and unrecorded cultural resources. Of the 761 known cultural resources within the project area, 422 sites would be open to allotment selection. Although these 422 sites are not likely to be eligible for inclusion on the NRHP there is a potential that these resources could be transferred out of Federal ownership. Similarly, there is a potential for some unrecorded cultural resources to be transferred out of Federal ownership. It is possible that these unrecorded cultural resources may be eligible for inclusion in the NRHP.

Once transferred out of Federal ownership, an adverse effect under Section 106, these resources would no longer be afforded certain protections provided under Federal historic preservation law and may not be managed in a manner that provides for their preservation or protection. As a result, it is possible that these resources and the information and cultural, scientific, values they retain, could be damaged, destroyed, or otherwise altered or diminished. Adverse effects to yet unknown historic properties within the project area are being addressed through the Section 106 process by means of the Programmatic Agreement (PA) for the Alaska Native Veteran Allotment Program. This PA lays out mitigation measures, such as the development of educational curricula about stewardship of archaeological resources, that the BLM is responsible for implementing and serves to minimize adverse effects to historic properties. These mitigation measures would also apply to other cultural resources known and recorded which are not or are of a type unlikely to be eligible for inclusion on the NRHP.

A maximum of 480,000 acres of land could be transferred out of Federal ownership as part of this Allotment Program, which is less than 3 percent of the total acres under consideration. The number of known and unrecorded resources within the 27.5 million acres that could be transferred out of Federal ownership likely represents only a small fraction of the total number of known and unrecorded resources that occur within these areas; considering this relative to the millions of acres of lands that would be retained in Federal management, the BLM expects that the total impacts to cultural resources from opening approximately 27.5 million acres of Federal land to allotment selection would be minimal.

3.7.3.1 Reasonably Foreseeable Actions

The Central Yukon RMP could potentially result in opening up to 13,275,000 acres of BLM-administered land for selection of Native allotments by eligible individuals pursuant to Section 1119 of the Dingell Act and to public land laws. As with the lands analyzed under the Proposed Action, it is likely that there are both known and unrecorded cultural resources and historic properties located on these 13,275,000 acres. These resources also have the potential to be transferred out of Federal ownership. Adverse effects to known historic properties, as well as yet unknown historic properties and cultural resources within the Central Yukon planning area, would be addressed through the Section 106 process by means of the PA for the Alaska Native Veteran Allotment Program and the BLM would consult under Section 106 before the PLOs were revoked, if the Department were to revoke the PLOs. The effects of opening approximately 27.5 million acres to allotment selection in the context of other past, present, and reasonably foreseeable future actions, is likely to be minimal.

3.7.4 Environmental Effects—Alternative C

Impacts to cultural resources, including cumulative impacts, under this alternative would be substantially similar to those under the Proposed Action. All known historic properties and sites identified by the BLM as otherwise retaining important scientific, historical, or cultural value within the project area would be excluded from selection under this alternative and would remain under Federal ownership, thereby avoiding adverse effects to known historic properties. It is possible that fewer known and unrecorded

cultural resources would potentially be transferred out of Federal ownership because less land would be made available (approximately 25.3 million acres) to allotment selection.

3.8 How would opening lands to allotment selection affect recreation management and public access?

3.8.1 Affected Environment

BLM Alaska-managed lands contain a wide variety of recreational activities for the public. Year-round activities abound on the more than 70 million acres managed by the BLM in Alaska. Activities such as fishing, hunting, river trips, Off-Highway Vehicle (OHV) use, cross country skiing, heli-skiing, bicycling, camping, and photography are all experienced by the public. Over one million visits were recorded on BLM Alaska lands in fiscal year 2021 via the Recreation Management Information System (RMIS).

There are varied recreational setting characteristics (RSC) across lands under consideration for opening to Native allotment selection such as front country, middle country, and back country zones. Visitor experiences and expected outcomes are generally aligned with these setting characteristics and zones.

Visitor use occurs in a variety of ways from casual use to commercial guided trips and experiences authorized through Special Recreation Permits (SRPs). SRPs are authorized for the commercial or competitive use of BLM lands and waters. They are issued to protect resources, control visitor use, and ensure a fair return of value for the commercial use of the public lands. BLM Alaska has approximately 140 SRPs authorized throughout the state. Approximately 1/3 of the total 140 SRPs throughout the state are for commercial hunting guides. Hunting guides typically have their use area authorized by ADF&G Guide Use Areas (GUAs). GUAs are large parcels of predefined land, and guides are typically authorized for all unencumbered BLM lands within those parcels.

The BLM has several Special Recreation Management Areas (SRMAs) that are within the lands under consideration for opening. SRMAs are administrative units where the existing or proposed recreation opportunities and recreation setting characteristics are recognized for their unique value, importance, and/or distinctiveness, especially as compared to other areas used for recreation. The BLM manages SRMAs to protect and enhance a targeted set of activities, experiences, benefits, and desired recreation setting characteristics. Within SRMAs, recreation and visitor services management are recognized as the predominant land use plan focus, where specific recreation opportunities and recreation setting characteristics are managed and protected on a long-term basis.

The BLM has designated SRMAs in two planning areas affected by this action. The Kobuk-Seward Peninsula RMP designated the Squirrel River SRMA, as well as Salmon Lake-Kigluik SRMA. In the Squirrel River SRMA hunting is the predominant recreational use. In the Salmon-Kigluik SRMA, hunting, berry and subsistence gathering, and recreational use of the Salmon Lake campground are the predominant uses. The Ring of Fire RMP designated the Haines SRMA. Within the Haines SRMA, commercial use through heli-skiing is the predominant use. This area has been identified to possess high-quality sought after heli-ski opportunities for the public.

The Dingell Act does not include components of the National Wild and Scenic River System as available federal land.[21] However, the lands adjacent to the conservation boundaries of the Unalakleet, Gulkana, and Delta Wild and Scenic Rivers would be opened to selection in the proposed action. Section 10 of the Wild and Scenic Rivers Act requires agencies to manage, “Each component of the national wild and

[21] 43 USC 1629g-1(a)(1)(B)(ix)

scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system…"

Regulatory Framework

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

Data and Data Collection

Data used for the analysis in this Proposed Action was obtained through a variety of sources. Geospatial information was obtained through the BLM Alaska ArcGIS Online map system, as well as Citrix ArcMap and ArcCatalog. Visitation data was obtained through the RMIS, personal observations of field users through professional time in the field in BLM Alaska from 2018–2021, as well as a recently conducted 2021 SRP audit for BLM Alaska. An understanding of existing planning decisions was obtained through review of approved RMPs.

3.8.2 Environmental Effects—No Action Alternative

BLM-administered land within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas would continue to be managed under existing PLOs.

3.8.3 Environmental Effects—Alternative B (Proposed Action)

Under the Proposed Action, approximately 27.5 million acres of Federal land would be opened to allotment selection and opening these lands to allotment selection could directly affect recreation users.

Over one million visitors utilized BLM Alaska managed lands in fiscal year 2021. These visitors were recorded by several methods: 1) Use counts at established and designated campgrounds, waysides, visitor centers, or trailheads; and 2) Use counts through SRP post use reports, filed annually, and 3) Recreation Use Permits (fee envelopes) at BLM fee campgrounds. The Proposed Action will not affect recreational use at designated sites because only vacant, unappropriated, and unreserved land is considered available Federal land under the Dingell Act, so these types of sites would be excluded.

The conveyance of parcels of land into private ownership could affect general recreation users and access for those users, such as winter use snowmobilers and year-round hunters, however. Recreation users that have previously utilized BLM lands that may be conveyed as part of the Proposed Action will no longer be able to utilize the conveyed lands without the landowner's permission. There could be situations where a parcel of land allotted is within a travel route to other locations, including cabins, rivers, or trap line locations. Allotments are made subject to known trails, but it is likely that some conveyances will occur where the trail is not noted in the Certificate of Allotment. This could affect travel routes and access to cabins, rivers, or trapping, hunting, or fishing access. However, based on the reasonably foreseeable development described in Section 3.2, Project Development, this is a limited effect because of the remote nature of these lands and because the parcels will likely be surrounded by public lands that would be used

for the same purposes. Opening the lands to the Allotment Program is not expected to increase access to existing public lands from the future allotments.

Current SRP holders could be affected by opening the lands to the Alaska Native Veteran Allotment Program as well. As indicated in the affected environment section, most commercial hunting outfitter and guides authorized through an SRP have their use area determined and authorized via the State of Alaska GUAs. The State of Alaska is divided into 26 Game Management Areas, within which each of these GUAs are determined. There are 211 GUAs throughout Alaska. These areas span large geographic boundaries; for example, GUA 23-06 outside of Kotzebue, Alaska has a total area of 2.6 million acres. In GUA 23-06, BLM unencumbered ownership comprises 35 percent of the land, or approximately 920,000 acres. Using the example of GUA 23-06, the BLM currently has one SRP for commercial hunting, and 5 commercial SRPs for air taxis or transporters. The SRPs would no longer grant use of the land to the parcels of land conveyed as Native allotments because the allotments would be in private ownership. SRP holders are authorized throughout the GUAs, and if allotments were conveyed, the removal from Federal ownership could result in lack of access to historically utilized parcels, undeveloped aircraft landing locations, or preferred hunting areas. Overall, the impact to SRP holders is expected to be minimal due to the unlikelihood of conflict because of the remote nature of these lands.

The effects to BLM's ability to manage the SRMAs are expected to be minimal. The Squirrel River SRMA has the highest recreation use of the SRMAs within the lands under consideration and conveyance of allotments in this area would have the highest chance to block access and use within the unit due to the conveyance into private ownership. The same is true within the Salmon Lake-Kigluik SRMA, but to a lesser degree due to the lower amount of usage in the area. However, given the size of allotments in relation to the SRMAs and expected dispersal of the parcels, the overall effects in these SRMAs are expected to be minimal except in very localized areas and the values and recreational importance for which the SRMA was designated will not be harmed. No effect is expected within the Haines SRMA because the terrain which makes it valuable for heli-skiing is not conducive to allotments.

There are three WSRs in areas where the Proposed Action could occur. Each WSR has specific management decisions related to travel management and OHV use. OHV use within the WSR corridors, which are ½-mile each side of the center line of the river, generally restrict or prohibit OHV cross country travel. Section 10 of the Wild and Scenic Rivers Act mandates that Federal agencies charged with management of these rivers protect the values that were identified at the time of promulgation of each river in the National System. The Proposed Action could affect those values. Specifically, if those corridor boundaries with potential selections on the perimeter were not able to be clearly identified. If individuals who were allotted parcels adjacent to those boundaries used OHVs in an area outside the WSR corridor, where the OHV designation was open to cross country travel by specific resource management plan, and then inadvertently crossed into the WSR corridor where they are limited or closed, those values or protections could be affected. The contribution of new trails, removal of brush, compaction of vegetation, or visual evidence of OHV encroachment could affect the values that BLM is charged with protecting and maintaining.

The possible anticipated effects to recreation access, SRMAs, SRPs, and Wild and Scenic Rivers from opening the land under consideration to allotment selection is not expected to substantially impact these resources primarily because the selection of allotments is expected to be dispersed across the area under consideration for opening. Opening lands to allotment selection is unlikely to substantially change the overall access patterns for the same reason and would not alter the characteristic landscape. Members of the public would still have access to BLM lands and waters, and the level of change to the visual landscape will be minimal, if altered at all.

3.8.3.1 Reasonably Foreseeable Actions

At the landscape scale, recreation on public lands and access to those lands are likely to be minimally affected by the lands entering private ownership and the slight incremental increases in human disturbance as a result of allotment conveyance to Native Alaska Veterans coupled with past, present, and reasonably foreseeable future actions within the largely undeveloped project area.

3.8.4 Environmental Effects—Alternative C

Under this alternative, slightly fewer acres of land would be made available for conveyance as Alaska Native Veterans Allotments. The effects of this alternative would be the same as those described under Alternative B, but the lands conveyed would be in a smaller area of public lands.

4 Consultation and Coordination

4.1 Summary of Public Participation

The BLM published a Notice of Intent on July 23, 2021, to prepare an EA to disclose and analyze the environmental effects of opening certain lands for selection by Native Veterans. The BLM solicited input on issues to be analyzed during the 60-day public scoping period from July 23 through September 21, 2021. No public meetings were held during the comment period. The BLM received 14 comment submissions. Of these letters, one letter was received from a Federally Recognized Tribe and two letters were received from ANCSA corporations (Section 1.7, Scoping and Issue Development).

The BLM released the EA for public review on March 22, 2022 for a 15-day comment period. The BLM invites public comment on the types of areas within the 27.5 million acres of BLM-managed land under consideration that may be of most interest to individuals eligible to receive allotments under the program. Additionally, the BLM would like more information on areas that should not be opened to allotment selection due to resource concerns.

4.2 Tribal Coordination

The BLM first reached out to Alaskan Federally Recognized Tribes and ANCSA corporations in May 2021 to seek input on the preparation of this EA. A letter was sent to Tribes and ANCSA corporations notifying them of four virtual tribal outreach meetings to collect input on opening lands within the Kobuk-Seward, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas to allotment selection. The letters also invited Tribes to engage in government-to-government consultation and ANCSA corporations to engage in ANSCA consultation. The meetings were held via teleconference on May 26 and 27, 2021, and June 14 and 15, 2021.

On December 23, 2021, letters were sent to Tribes and ANCSA corporations again inviting these entities to engage in government-to-government consultation or ANCSA consultation on the Proposed Action and initiating consultation under Section 106 of the NHPA. The BLM received several inquiries from Tribes and ANCSA corporations requesting additional information about the project or the Allotment Program to which the BLM responded. The Calista Corporation submitted a detailed letter that provided the BLM with input on cultural resource sites within the areas under consideration for opening. Upon request, the BLM engaged in formal ANCSA consultation with the Calista Corporation on February 23, 2022.

4.3 Agency Consultation

The BLM has completed informal consultation on Alternative B, the Proposed Action, with USFWS under Section 7(a)(2) of the ESA for the Steller's eider and polar bear on March 14, 2022. The USFWS concurred with the BLM that Alternative B would ***not likely adversely affect*** spectacled and Steller's eider or polar bear.

In accordance with the Magnuson-Stevens Fishery Conservation and Management Act, the BLM consulted on EFH consultation with the National Oceanic & Atmospheric Administration's National Marine Fisheries Service (NMFS) and received a concurrence letter on March 11, 2022 that Alternative B, the Proposed Action, may adversely affect EFH. Although the BLM has no further management responsibilities for lands that are conveyed under the Allotment Program, the agency recognizes the importance of sharing information with the new landowner regarding the conservation of sensitive aquatic resources, like salmon habitat. Accordingly, the BLM has committed to providing a brochure to allotees developed by the Mat-Su Salmon Habitat Partnership, which describes the value of riparian areas for

salmon. Although this document was developed for the Matanuska-Susitna region, it provides broadly applicable information about the important role private landowners play with respect to salmon habitat conservation. The document the BLM would provide to allotees can be accessed at: http://matsusalmon.org/wp-content/uploads/2020/12/Riparian_Summary_1-14-21.pdf Additionally, the BLM would provide new allottees with the following website links to support the understanding of impacts to EFH and conservation of EFH:

- Essential Fish Habitat: An Ecosystem Approach
- Impacts to Essential Fish Habitat from Non-Fishing Activities in Alaska
- EFH Fact Sheet
- NOAA Fisheries Alaska Website

4.4 Section 106 Consultation: National Historic Preservation Act

The BLM initiated Section 106 consultation in December 2021. The BLM sent letters to 484 entities across Alaska including Federally Recognized Tribes, ANCSA Corporations, local governments, and other interested parties inviting them to be consulting parties to the Section 106 process and share information or concerns about historic properties, cultural resources, or places of importance that could be impacted by the project. The Calista Corporation is the only party which expressed interest in engaging as a consulting party to the Section 106 process.

The BLM has determined that opening lands to potential selection under the Allotment Program has the potential to adversely affect historic properties, since the transfer of land out of federal ownership is an adverse effect pursuant to 36 CFR 800.5(a)(2)(vii). In consultation with the Alaska State Historic Preservation Office and the ACHP, the BLM determined that a PA, as described at 36 CFR 800.14(b)(1), is the most appropriate manner to meet its Section 106 NHPA compliance responsibilities. The PA is in development and will include measures to minimize and mitigate adverse effects to historic properties. The PA will be completed prior to the issuance of any decision to open additional lands for potential selection under the Allotment Program.

4.5 Coordination with Future Allottees

If the lands under consideration in this EA were opened to allotment selection, the BLM would provide certain information on specific resources to allottees upon conveyance of an allotment. The following information would be shared with new allottees:

- A pamphlet of information about paleontological resources in Alaska. Additionally, once finalized, a link to BLM Alaska's PFYC report would be included on the Alaska Native Veteran Allotment Program website (see Section Issue 1.9.8, which discusses the potential affects to paleontological resources).
- Maps that denote Wild and Scenic Rivers and the Iditarod National Historic Trail corridor boundaries, and any other Conservation System Unit boundary as well as the applicable travel management decisions for these areas as it relates to OHV travel and area designations.

The BLM would provide information to allottees for the purpose of providing an opportunity to better understand the resource and to understand the ways that a private property owner could help protect these resources if they were found on or near a private allotment.

4.6 Coordination with Special Recreation Permit Holders

If the lands under consideration in this EA were opened to allotment selection, the BLM would send notification letters to all SRP holders in the area to notify them of potential conveyances. SRP holders would be able to view selected and conveyed allotments at the Alaska Native Vietnam-era Veterans Land Allotment Program website.

5 List of Preparers

Team Member(s)	Team Role
Stewart Allen	Environmental Justice, Social and Economic Values
Casey Burns	Migratory Birds, Threatened and Endangered Species, Special Status Species
Carrie Cecil	Cultural Resources, Paleontological Resources, and Archaeology
Ann Erickson	Botany, Special Status Species
Dara Glass	Realty and Lands
Candy Grimes	Alaska Land Conveyance
Racheal Jones	Project Manager/NEPA Specialist/Areas of Critical Environmental Concern
Robert King	Cultural Resources, Paleontological Resources, and Archaeology
Paul Krabacher	Project Lead/Alaska Land Conveyance
Chelsea Kreiner	Land Withdrawals
VJ Maisonet-Montanez	Air Quality
Chris Mckee	Subsistence
Raymund Meliton	GIS, Maps
Zach Million	Recreation, Transportation, OHV, SRPs, Visual Resources, Wild and Scenic Rivers
Craig Perham	Threatened and Endangered Species
Dina Torres	Alaska Land Conveyance
Matt Varner	Fisheries, Flood Plains (EO 13112), Wetlands/Riparian
Shannon Vivian	Technical Editor/Writer

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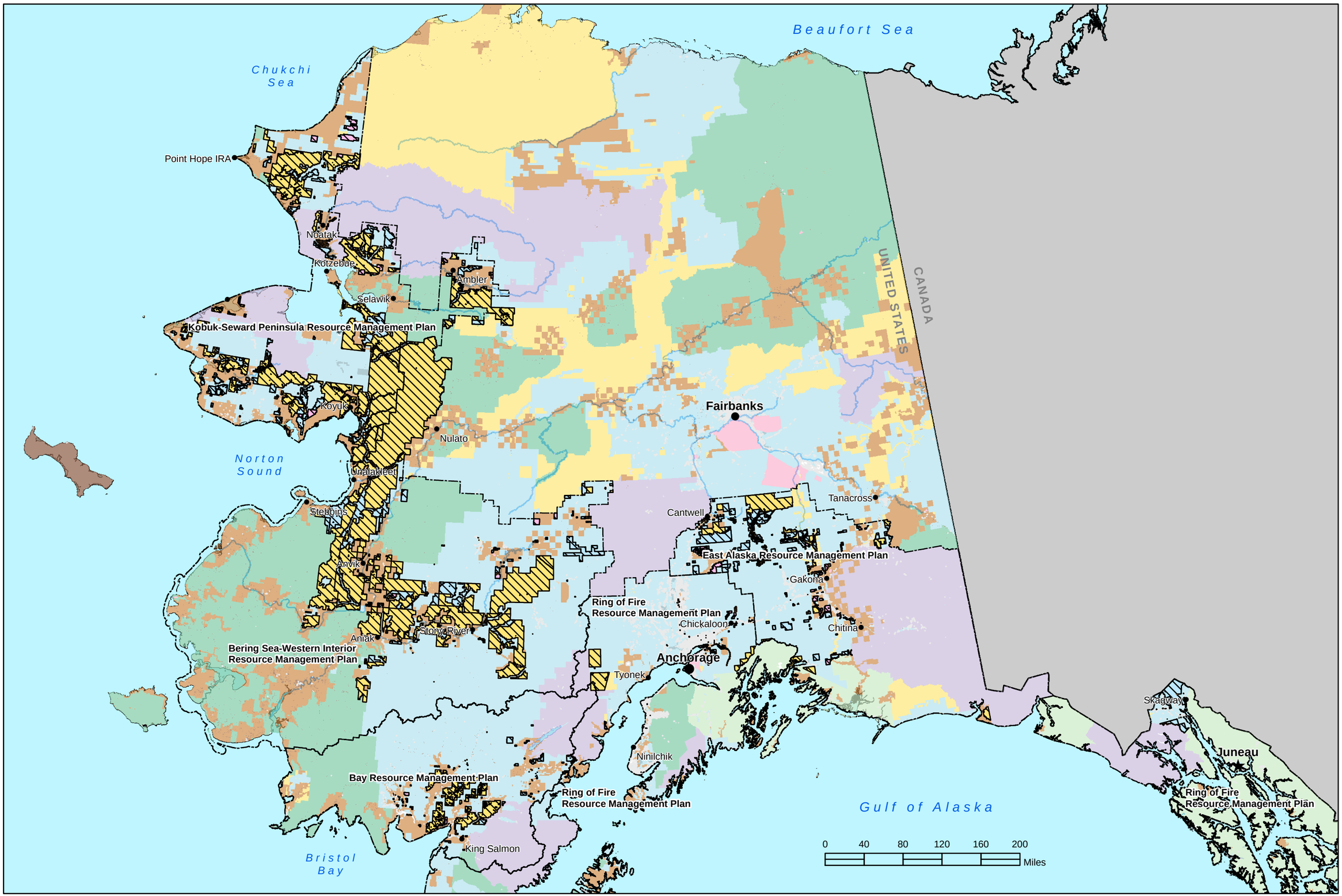
APPENDIX A

Maps

Lands Proposed for Opening to Native Selection - Map 1

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

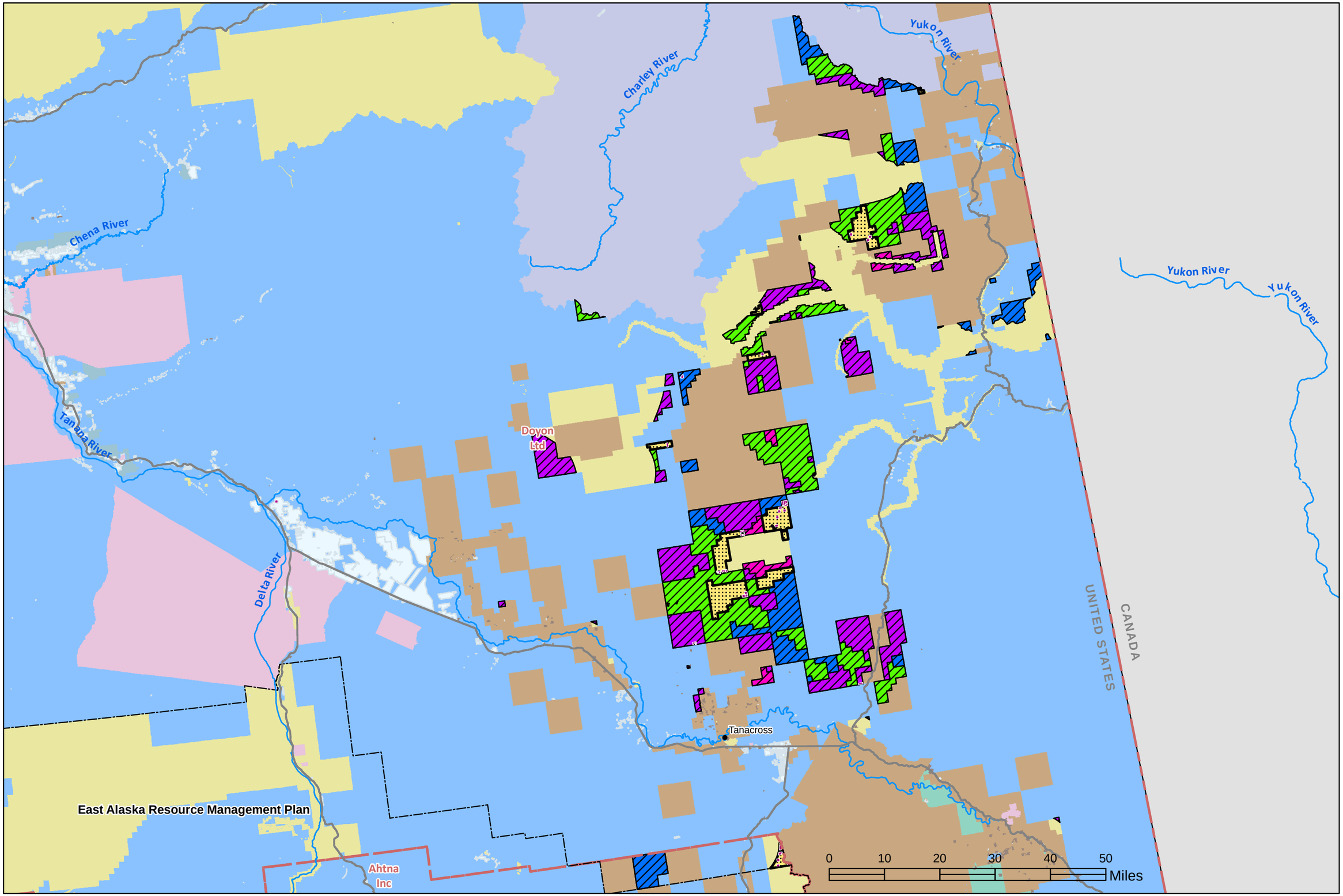


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Potentially Available - ANCSA Selected and State Selection
- Bureau of Land Management
- Bureau of Indian Affairs
- Department of Defense
- Fish and Wildlife Service
- Forest Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- BLM Land Use Planning Boundary

Lands Open to Allotment Selection - Available Lands - Map 2a

2/25/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

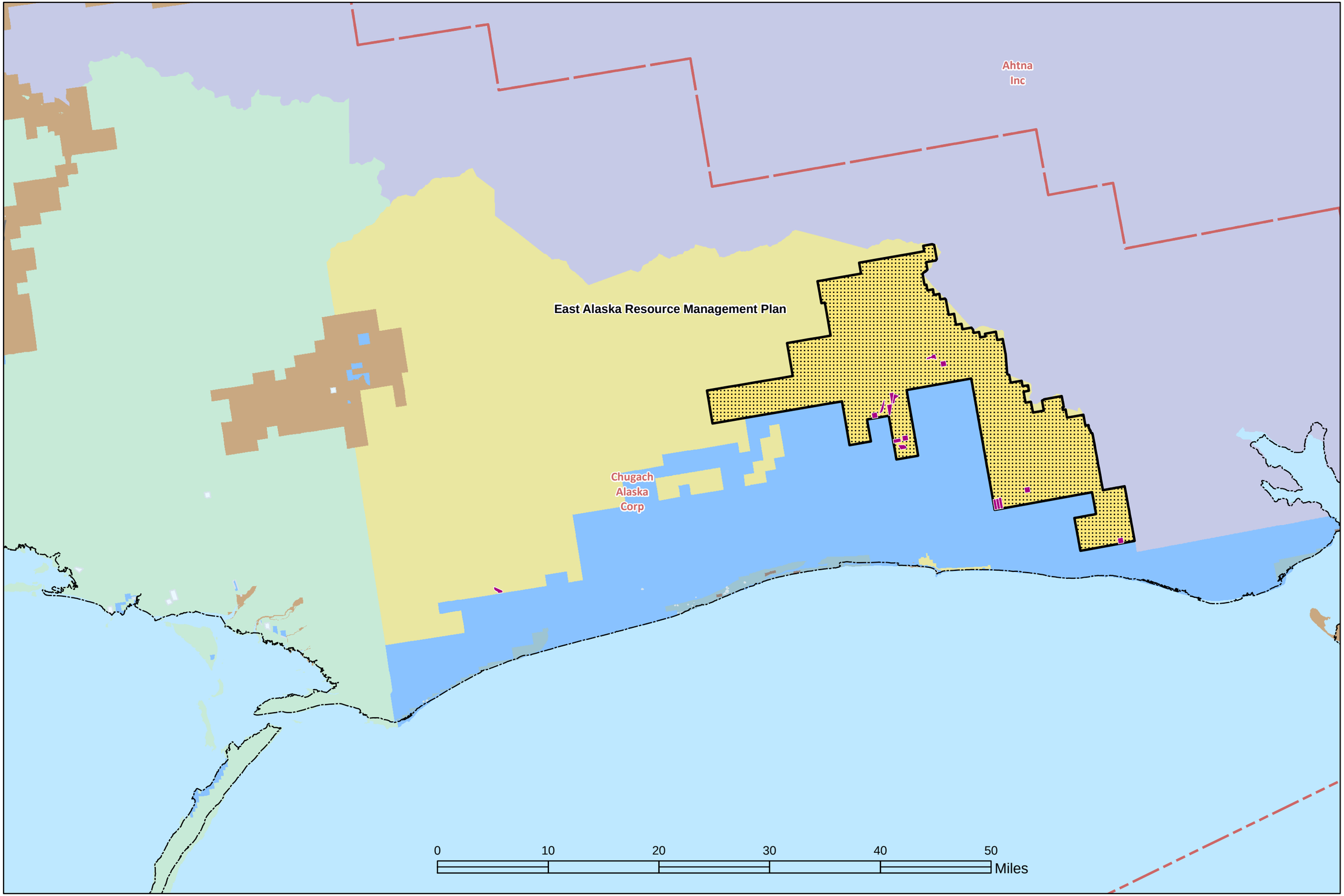


- Currently Available Lands
- Potentially Available ANCSA Selected Land
- Potentially Available State High Priority Selected Land
- Potentially Available State Selected Land
- Potentially Available ANCSA Selected and State Selected Land
- Native Veteran Allotment Selections
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Lands Open to Allotment Selection - Available Lands - Map 2b

2/25/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA



- Currently Available Lands
- Native Veteran Allotment Selections
- Bureau of Land Management
- Fish and Wildlife Service
- Forest Service
- National Park Service
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

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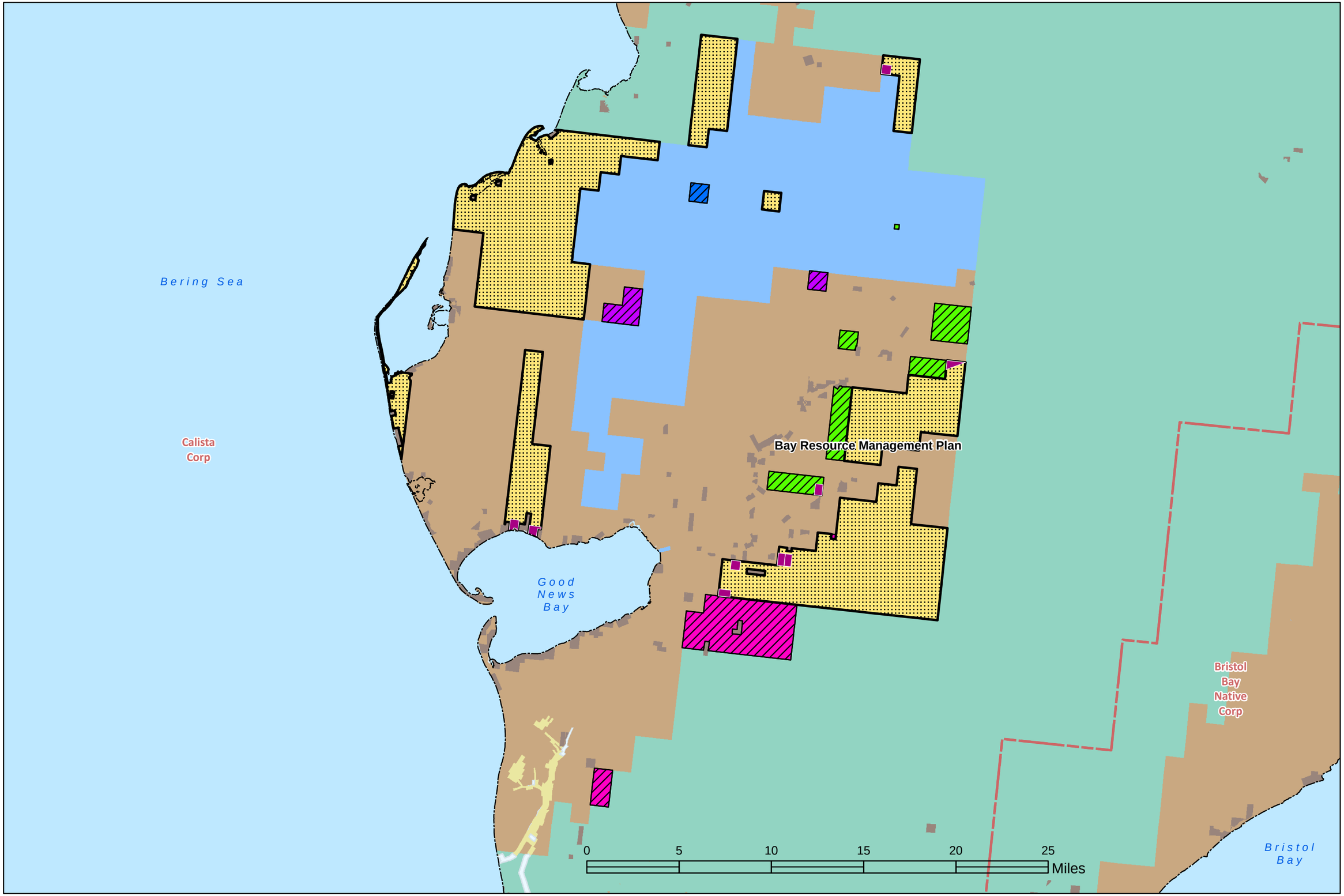
Lands Open to Allotment Selection - Available Lands - Map 2c

2/25/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA



- Currently Available Lands
- Potentially Available ANCSA Selected Land
- Potentially Available State High Priority Selected Land
- Potentially Available State Selected Land
- Potentially Available ANCSA Selected and State Selected Land
- Native Veteran Allotment Selections
- Bureau of Land Management
- Fish and Wildlife Service
- State
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative B - Proposed Action - Map 3a

2/17/2022

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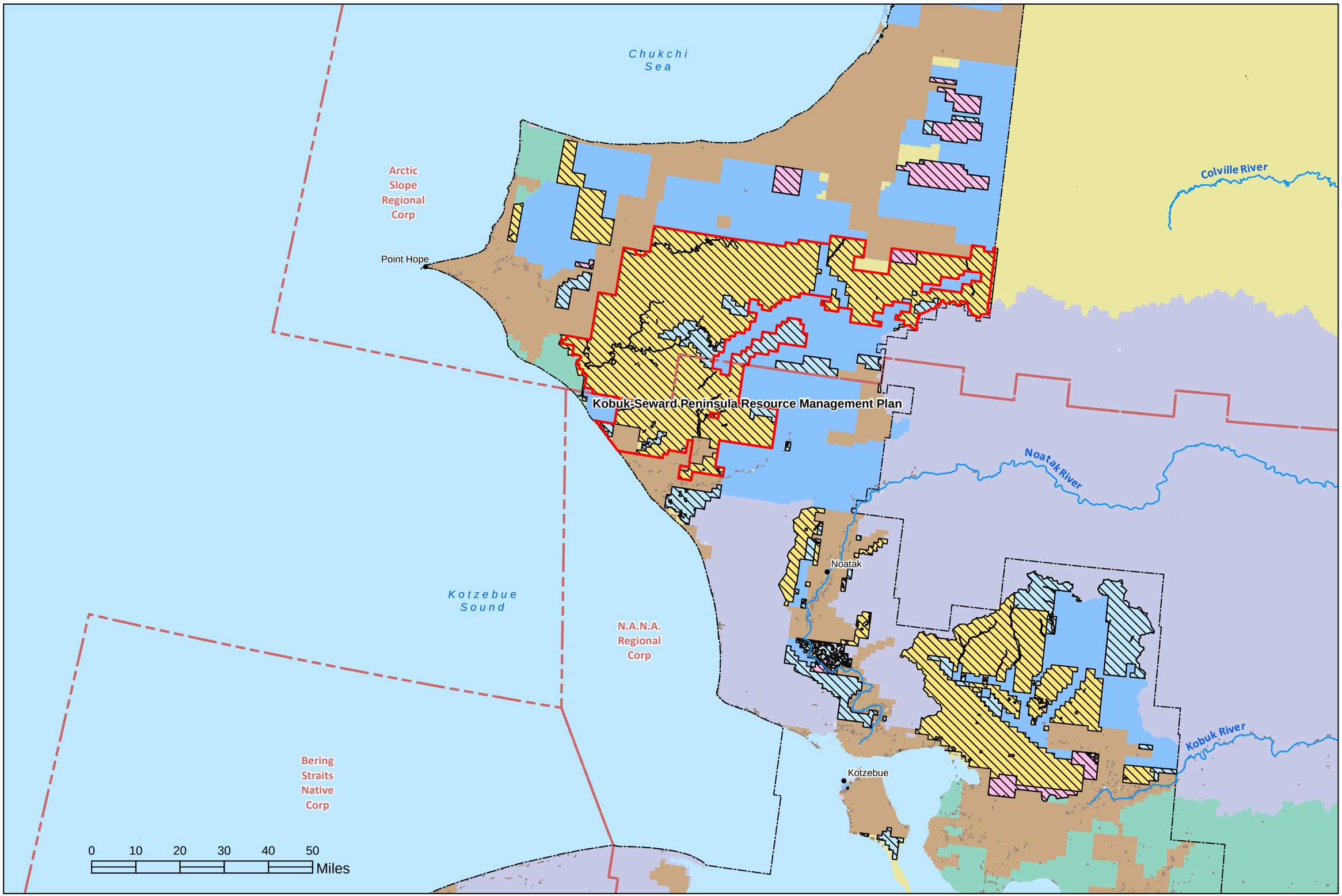

- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative B - Proposed Action - Map 3b

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

Shishmaref
Selawik
Kotzebue Sound
Selawik River
N.A.N.A. Regional Corp
Kobuk-Seward Peninsula Resource Management Plan
Kobuk River
Kugruk River
Agashashok River
Bering Straits Native Corp
Koyuk
Elim
Doyon Ltd
Yukon River
Nulato
Norton Sound
Unalakleet River
Calista Corp
0 10 20 30 40 50
Miles

- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Fairbanks
Anchorage
Juneau

Alternative B - Proposed Action - Map 3c

2/17/2022

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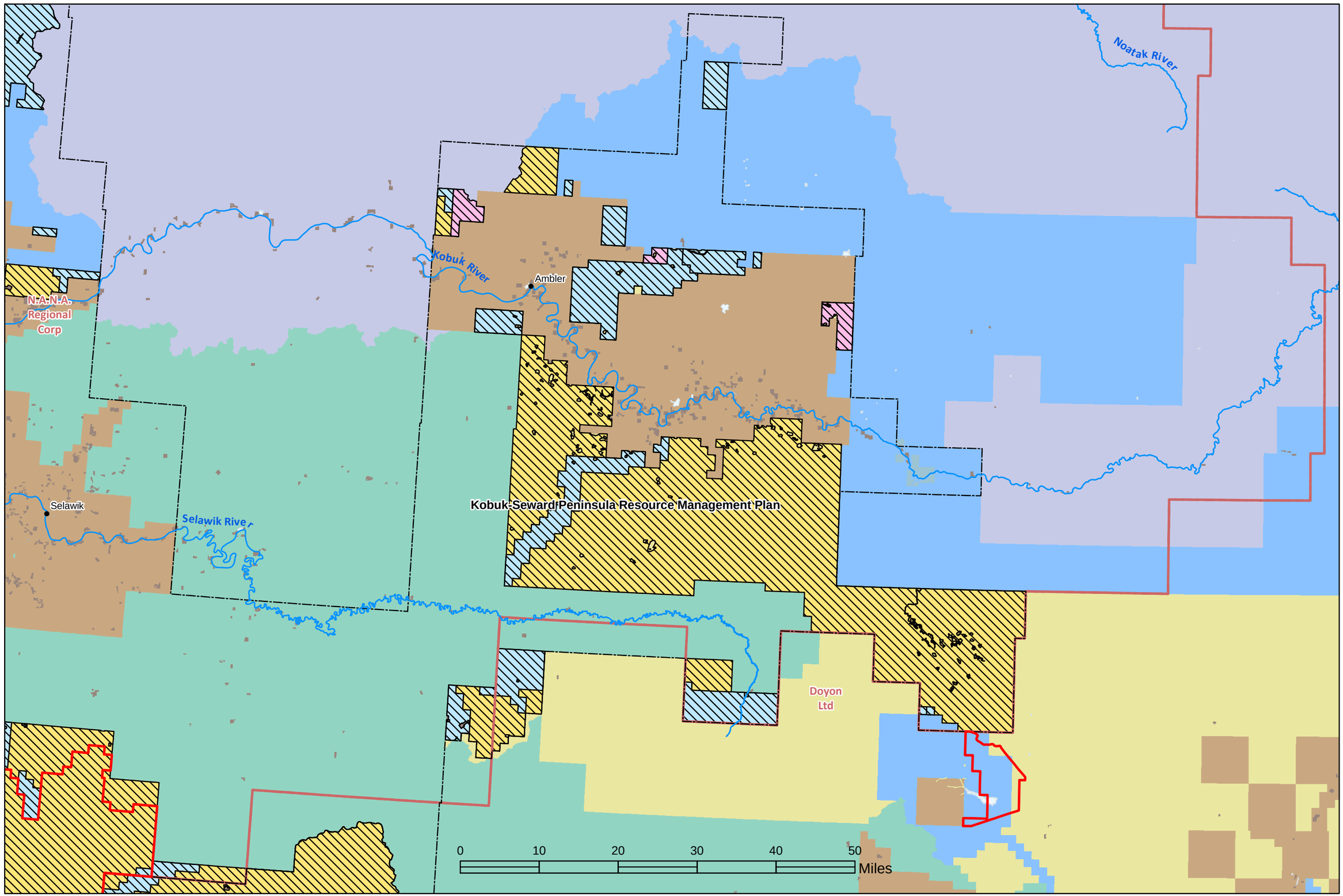

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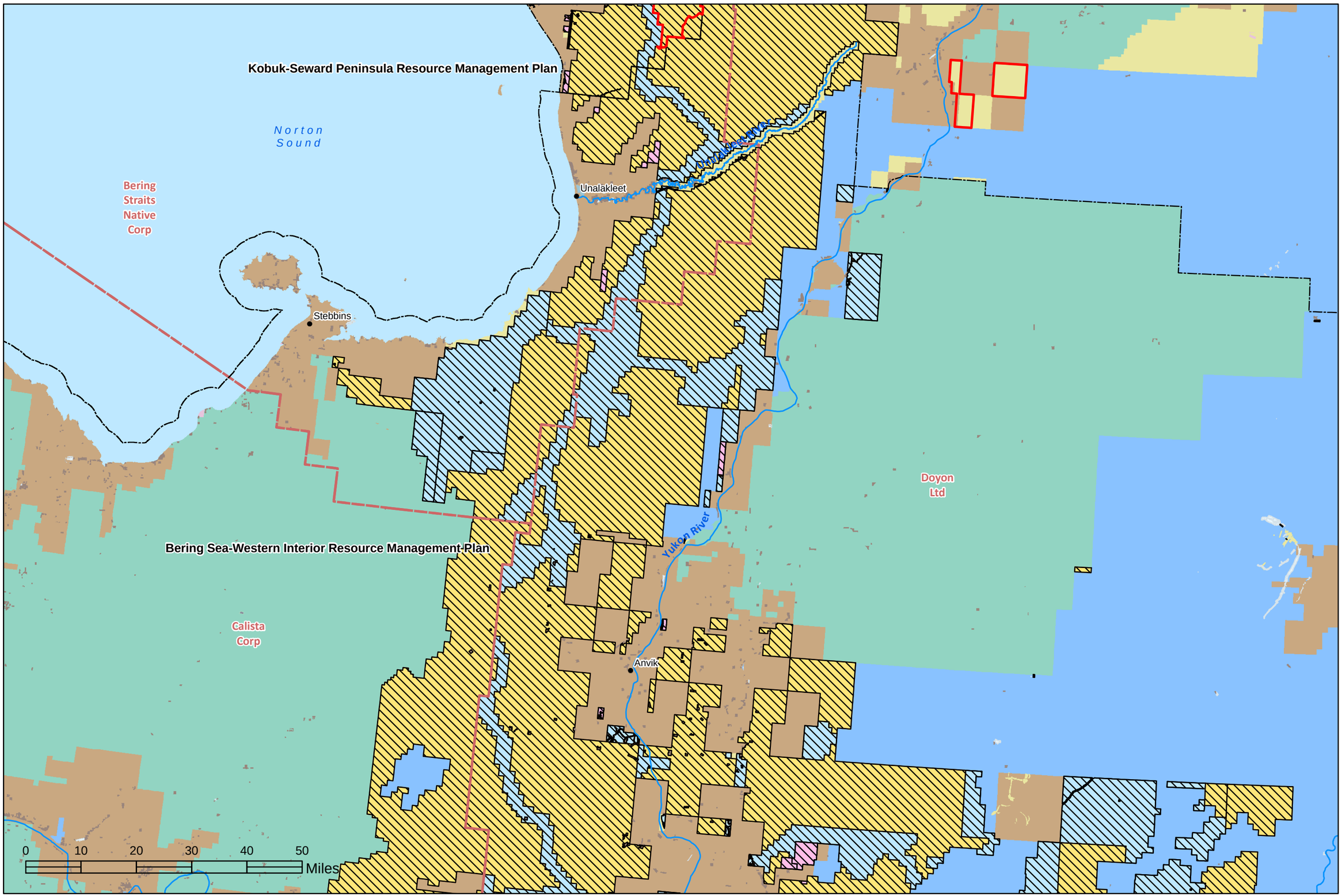
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative B - Proposed Action - Map 3d

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA



- Potentially Available
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- Potentially Available - State Selections
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- Area of Critical Environmental Concern (ACEC)
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative B - Proposed Action - Map 3e

2/17/2022

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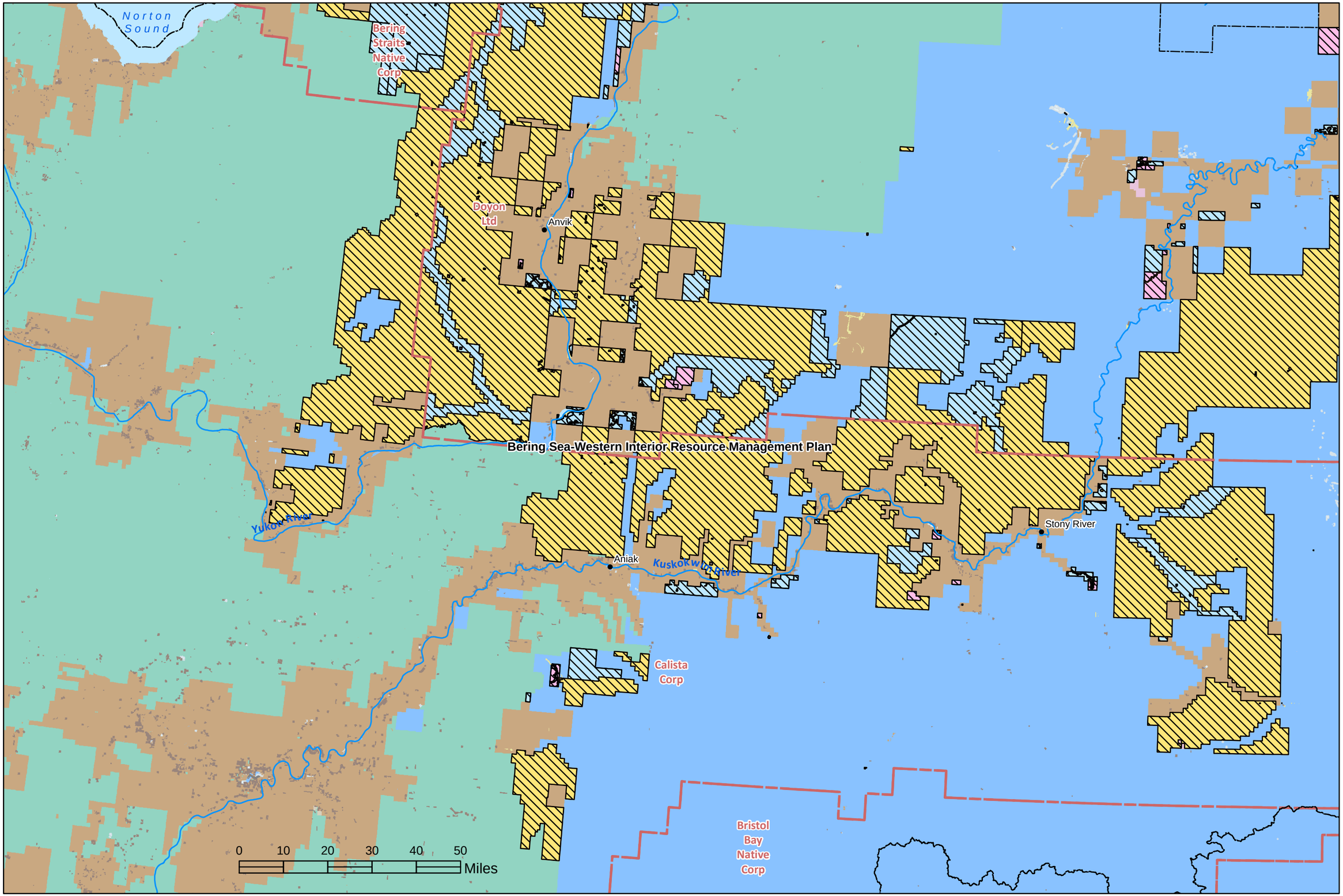

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- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

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Alternative B - Proposed Action - Map 3f

2/17/2022

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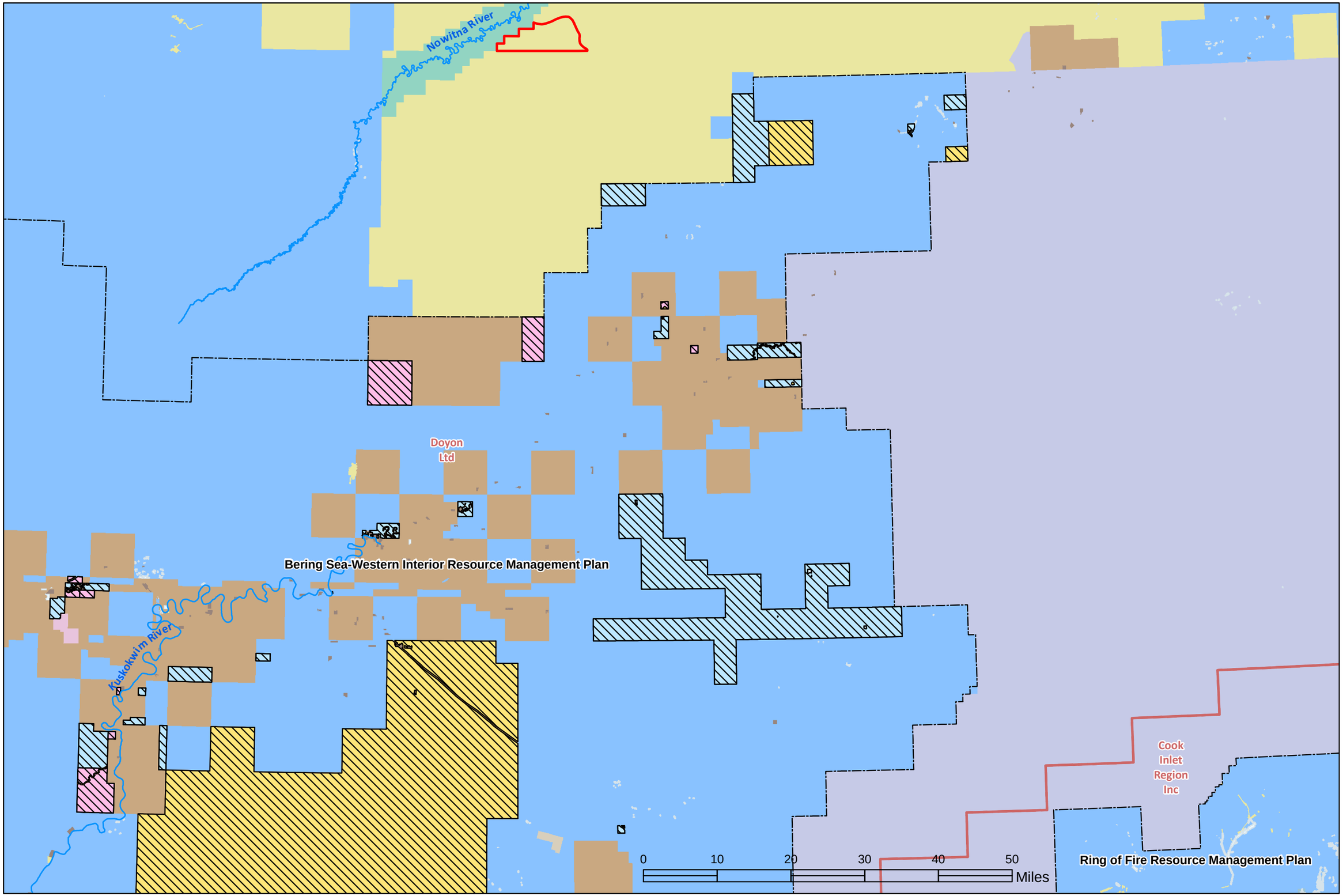

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- Potentially Available - State Selections
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- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative B - Proposed Action - Map 3g

2/17/2022

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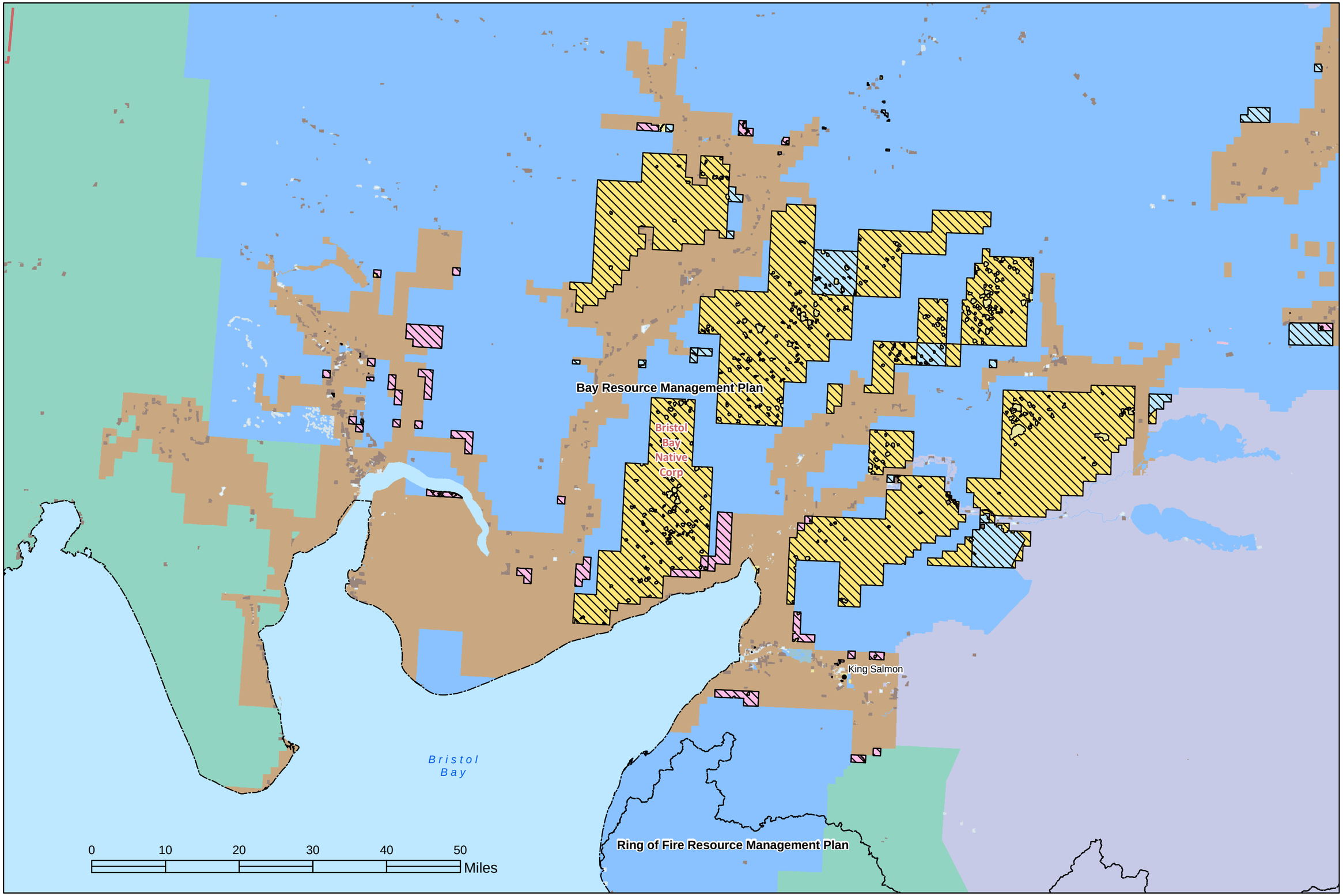

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- Potentially Available - State Selections
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- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative B - Proposed Action - Map 3h

2/17/2022

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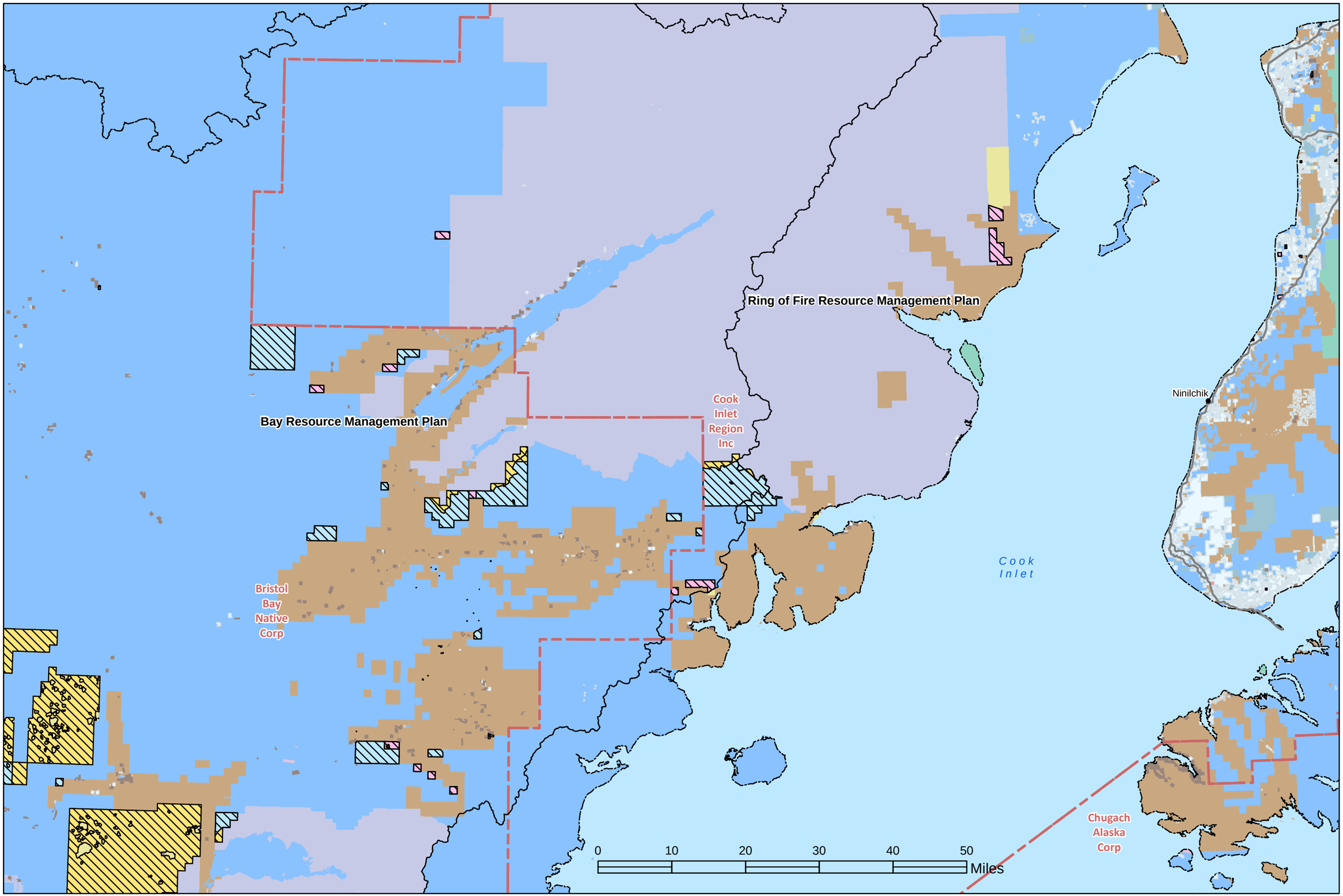

- Potentially Available
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- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative B - Proposed Action - Map 3i

2/17/2022

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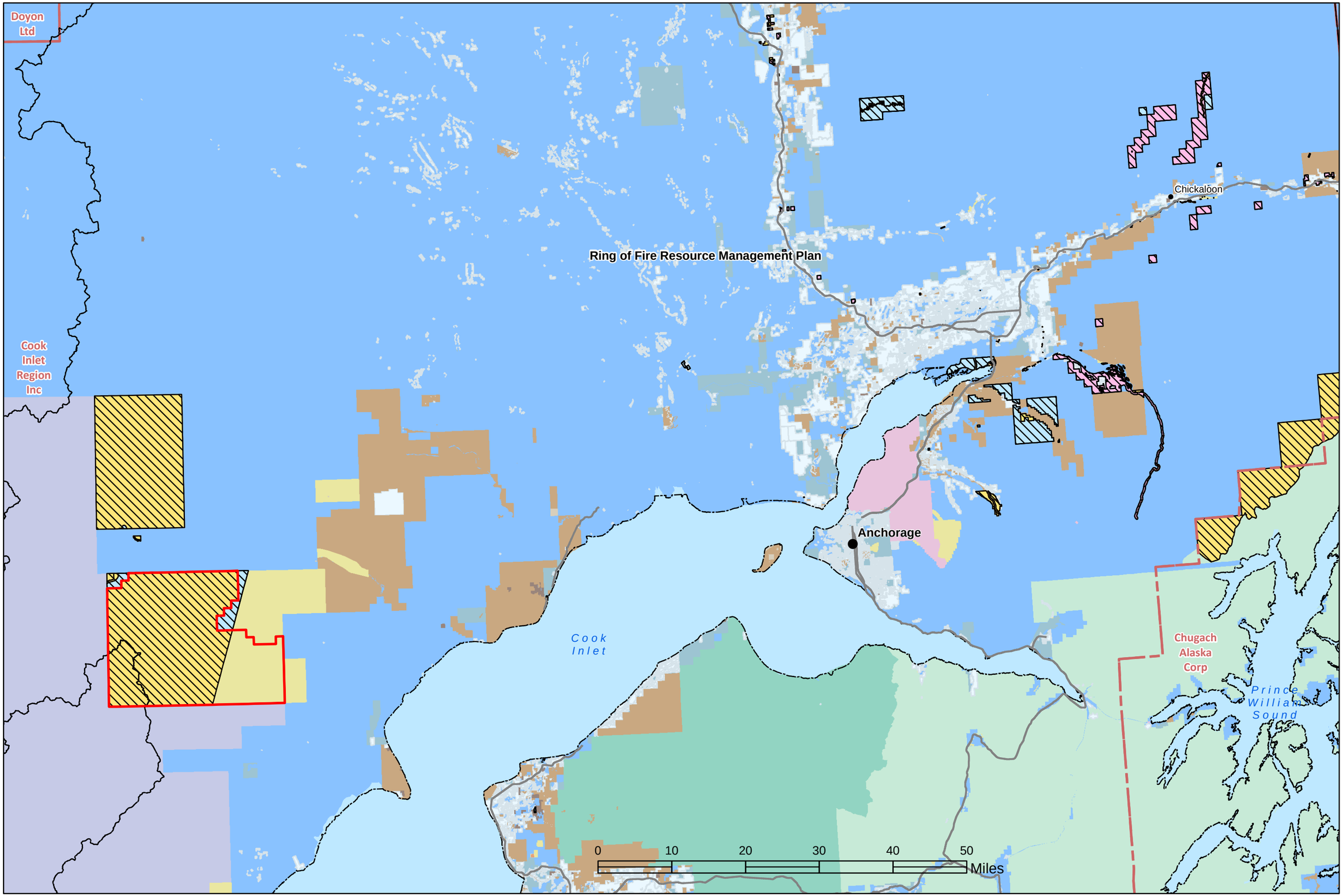

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- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- Forest Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative B - Proposed Action - Map 3j

2/17/2022

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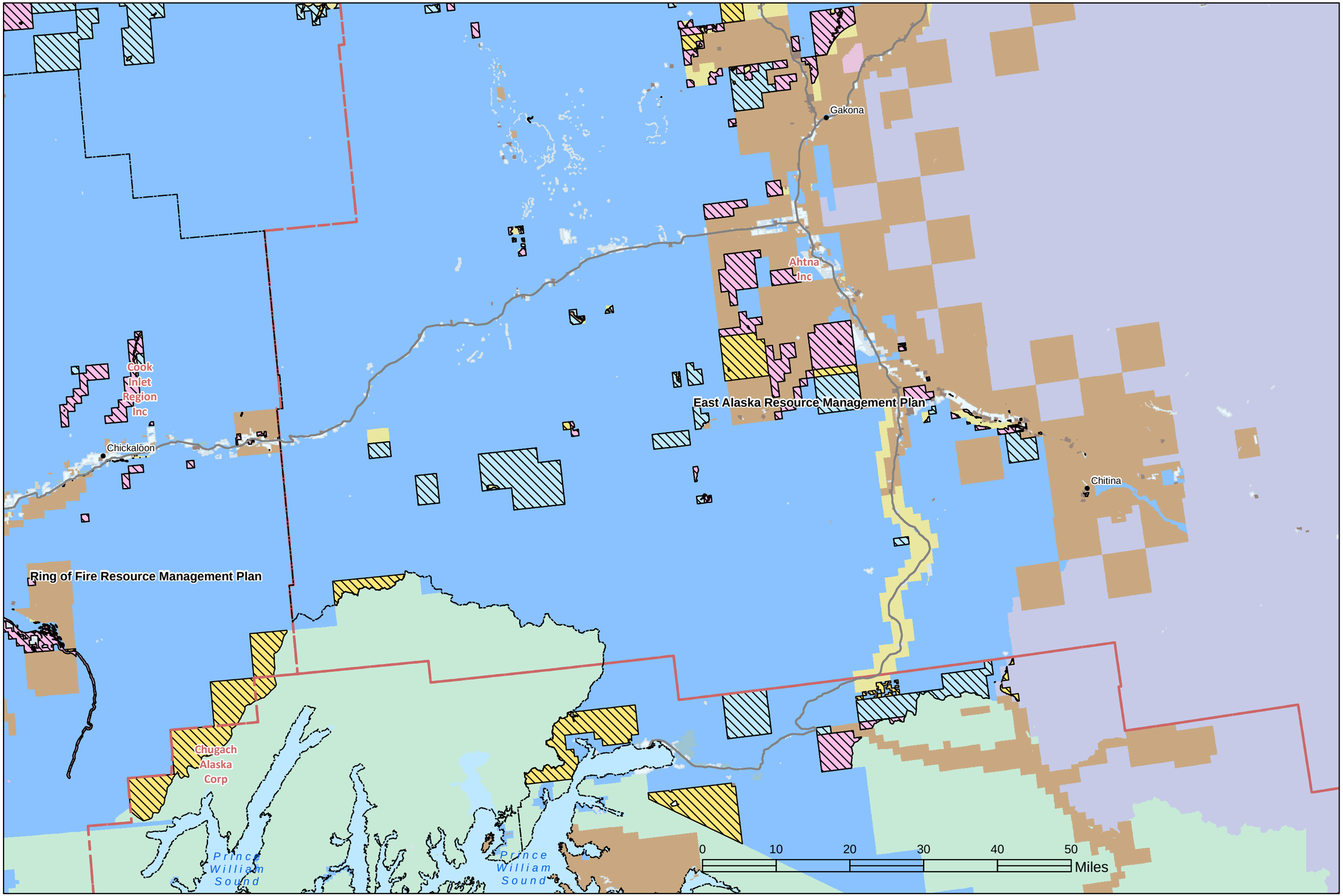

- Potentially Available
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- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- Bureau of Land Management
- Department of Defense
- Forest Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative B - Proposed Action - Map 3k

2/17/2022

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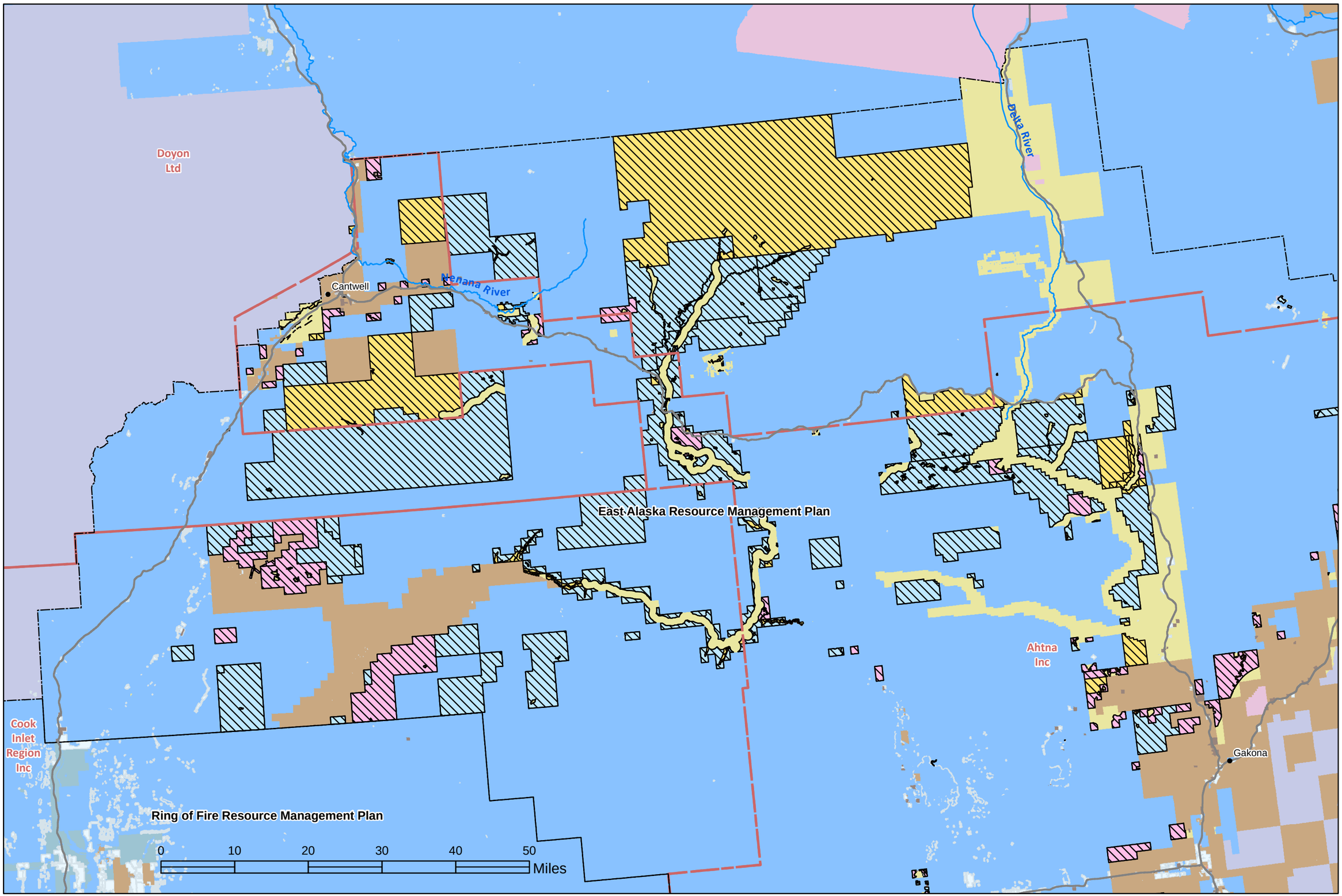
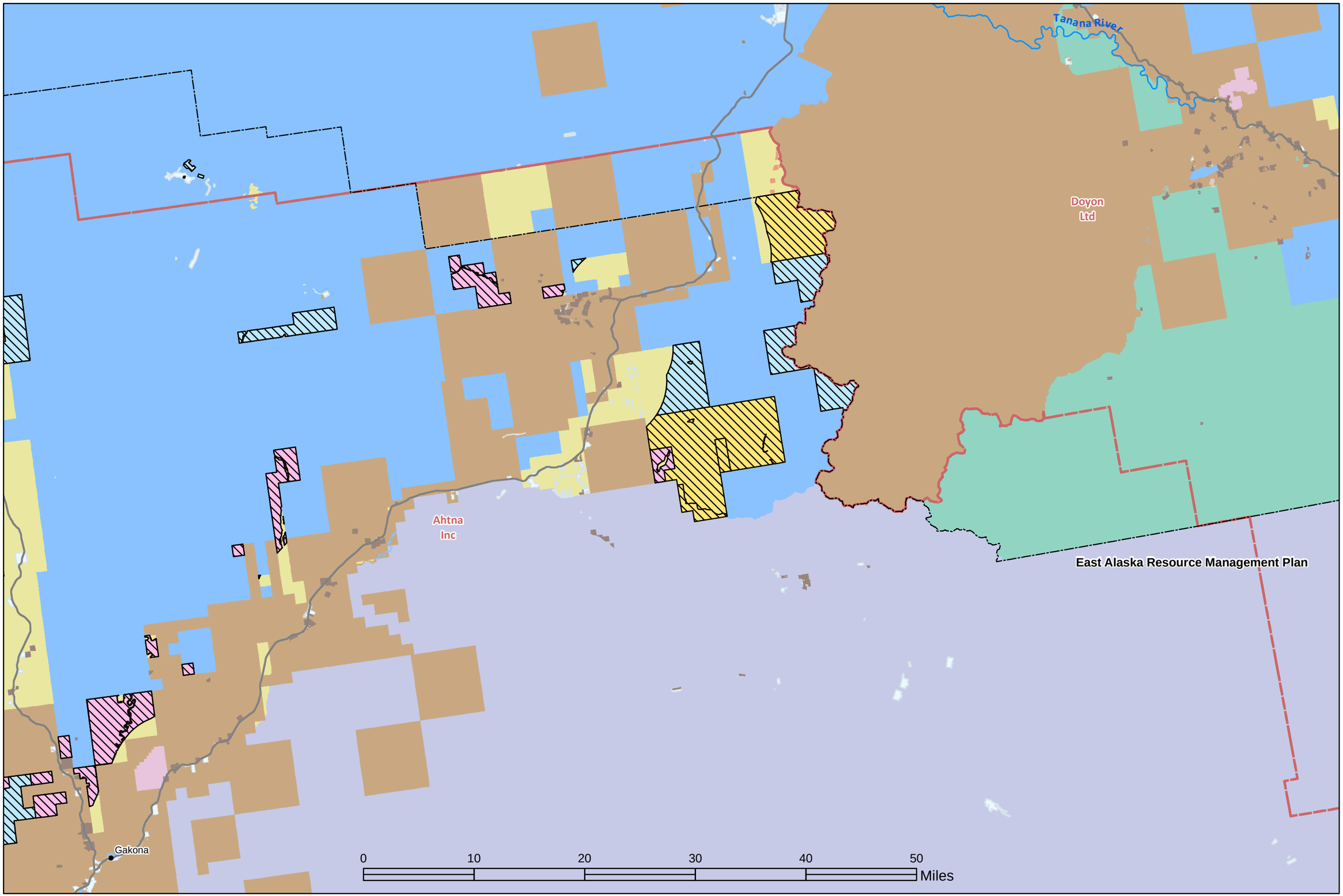


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Bureau of Land Management
- Department of Defense
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative B - Proposed Action - Map 3l

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

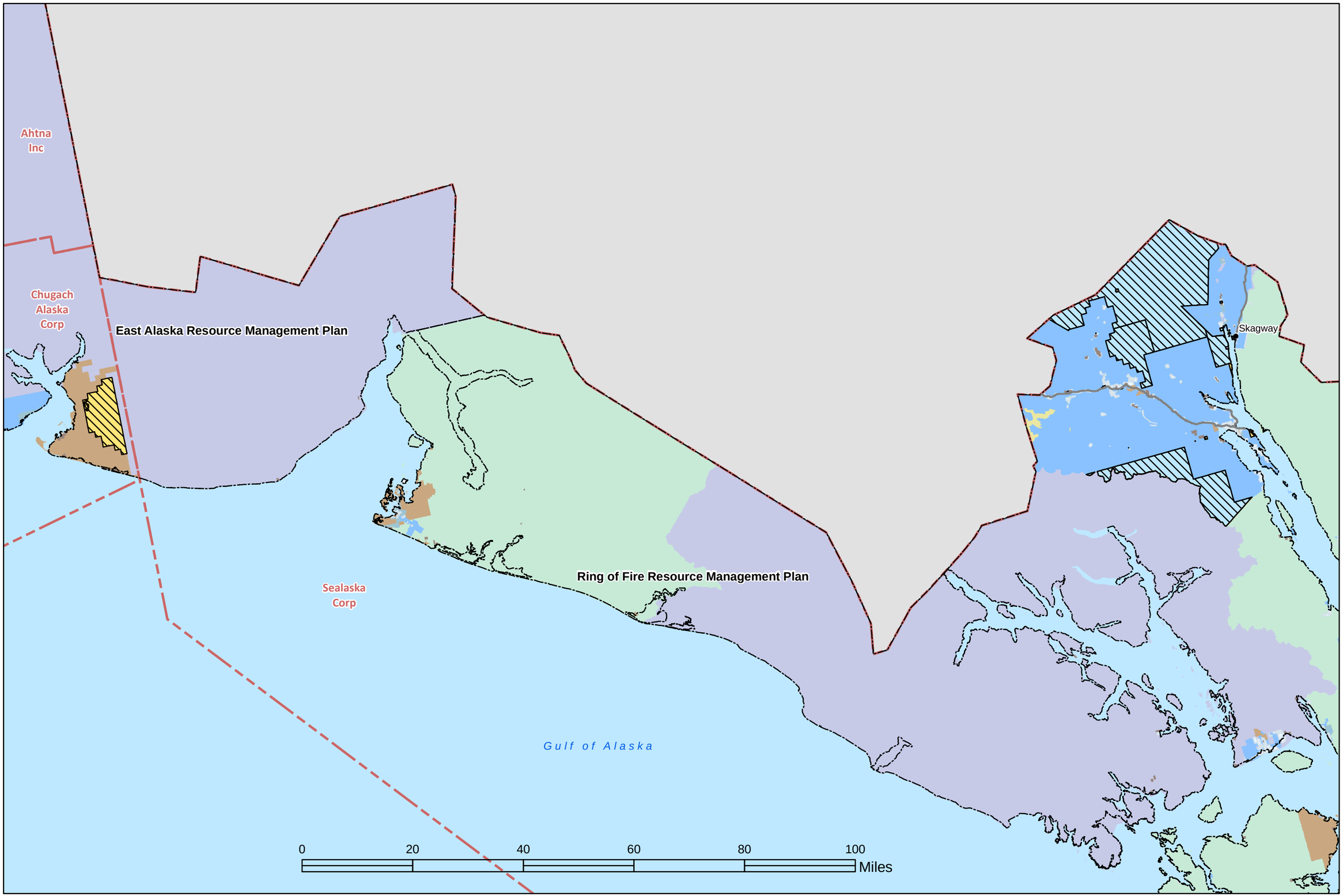


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative B - Proposed Action - Map 3m

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

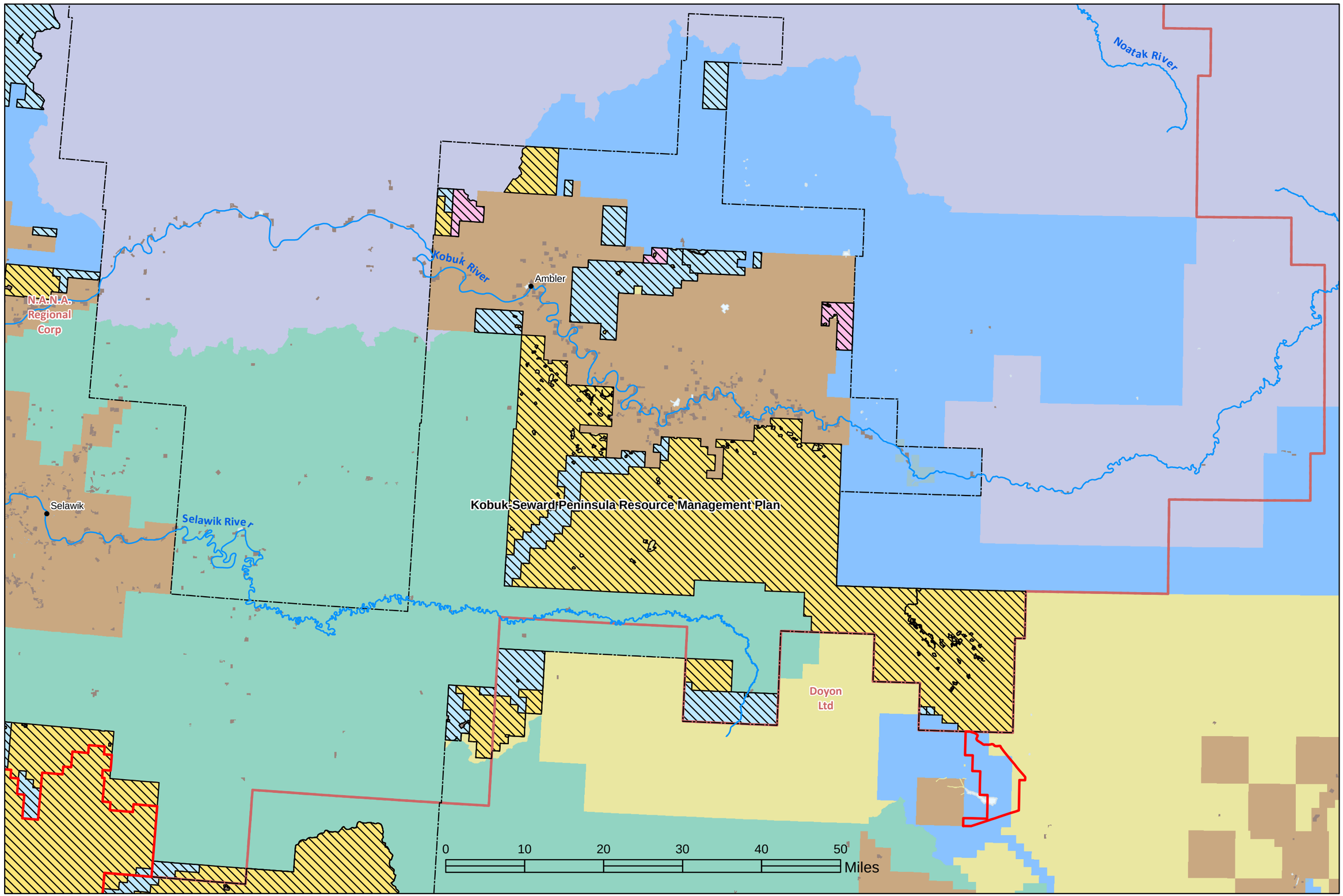


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- Forest Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4c

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA



- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Area of Critical Environmental Concern (ACEC)
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4b

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

Kobuk-Seward Peninsula Resource Management Plan

Shishmaref
Selawik
Kotzebue Sound
Selawik River
N.A.N.A. Regional Corp
Kobuk River
Kuuvanmiut
Bering Straits Native Corp
Agashashok River
Doyon, Ltd
Koyuk
Elim
Yukon River
Nulato
Norton Sound
Unalakleet River
Calista Corp
0 10 20 30 40 50 Miles

- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

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

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4a

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

Chukchi Sea

Arctic Slope Regional Corp

Point Hope

Colville River

Kobuk-Seward Peninsula Resource Management Plan

Noatak River

Noatak

Kotzebue Sound

N.A.N.A. Regional Corp

Bering Straits Native Corp

Kotzebue

Kobuk River

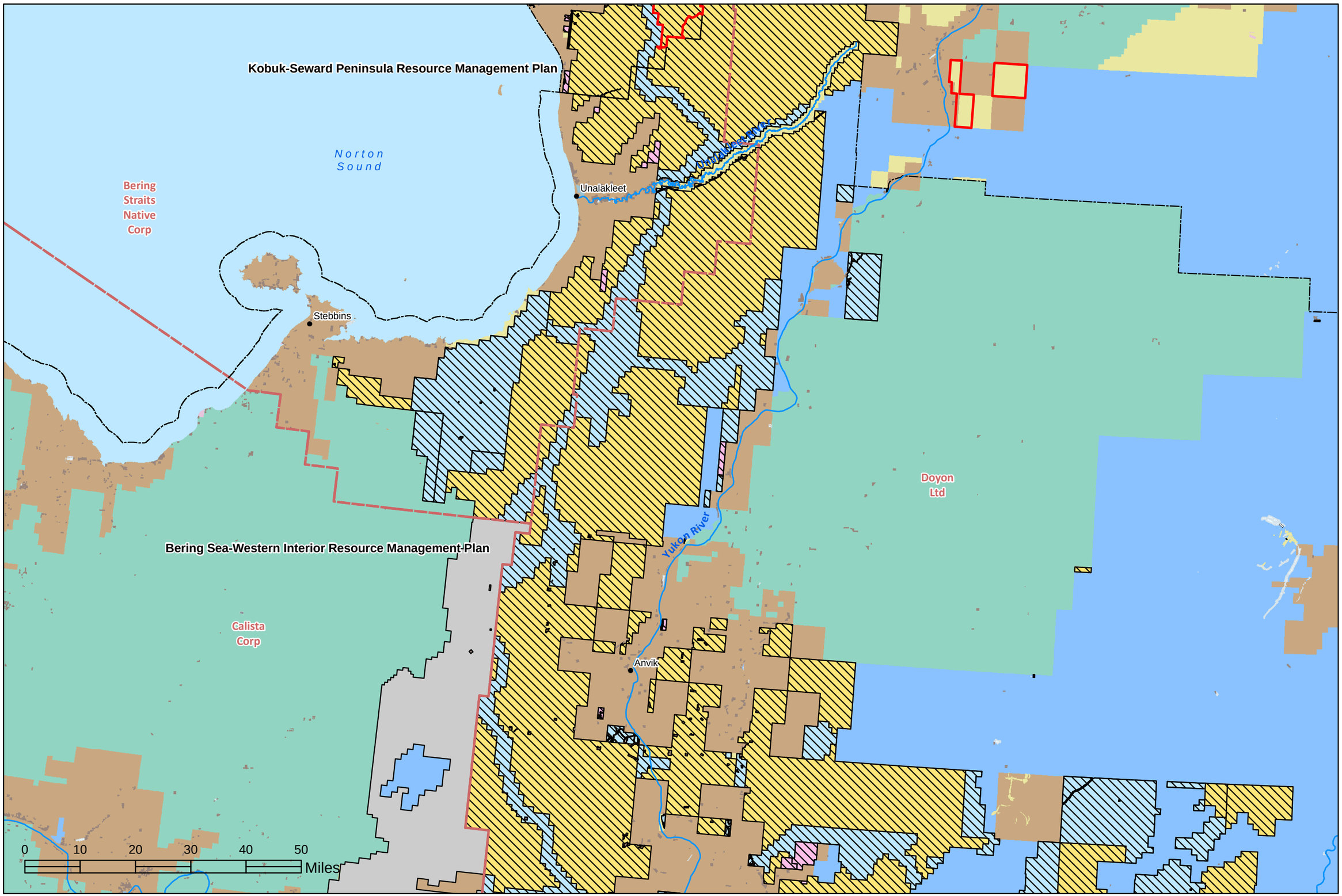
0 10 20 30 40 50 Miles

- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4d

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA



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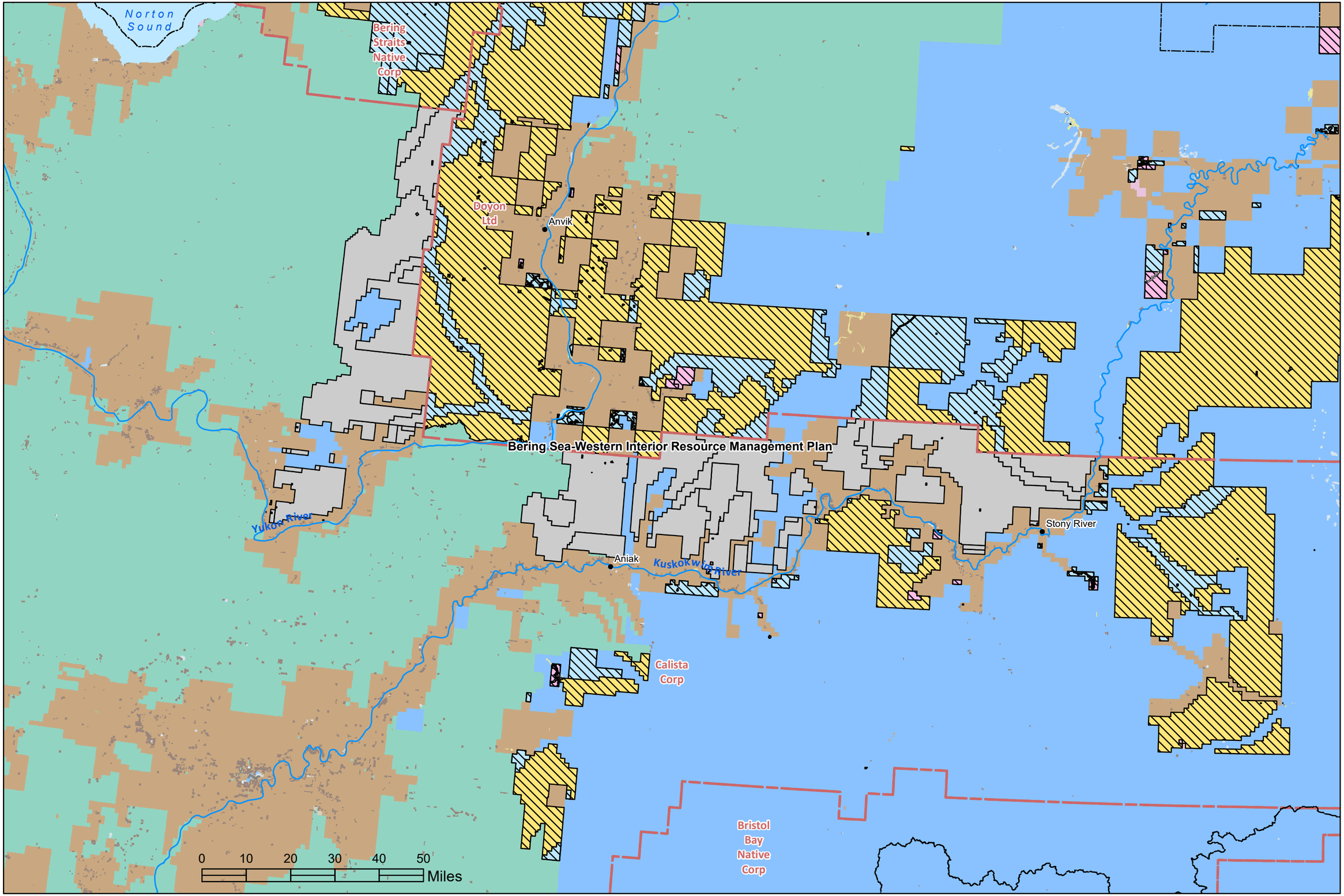
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- State Topfiling Priority 1 and 2 Lands Removed
- Calista Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation Map 4e

3/21/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA



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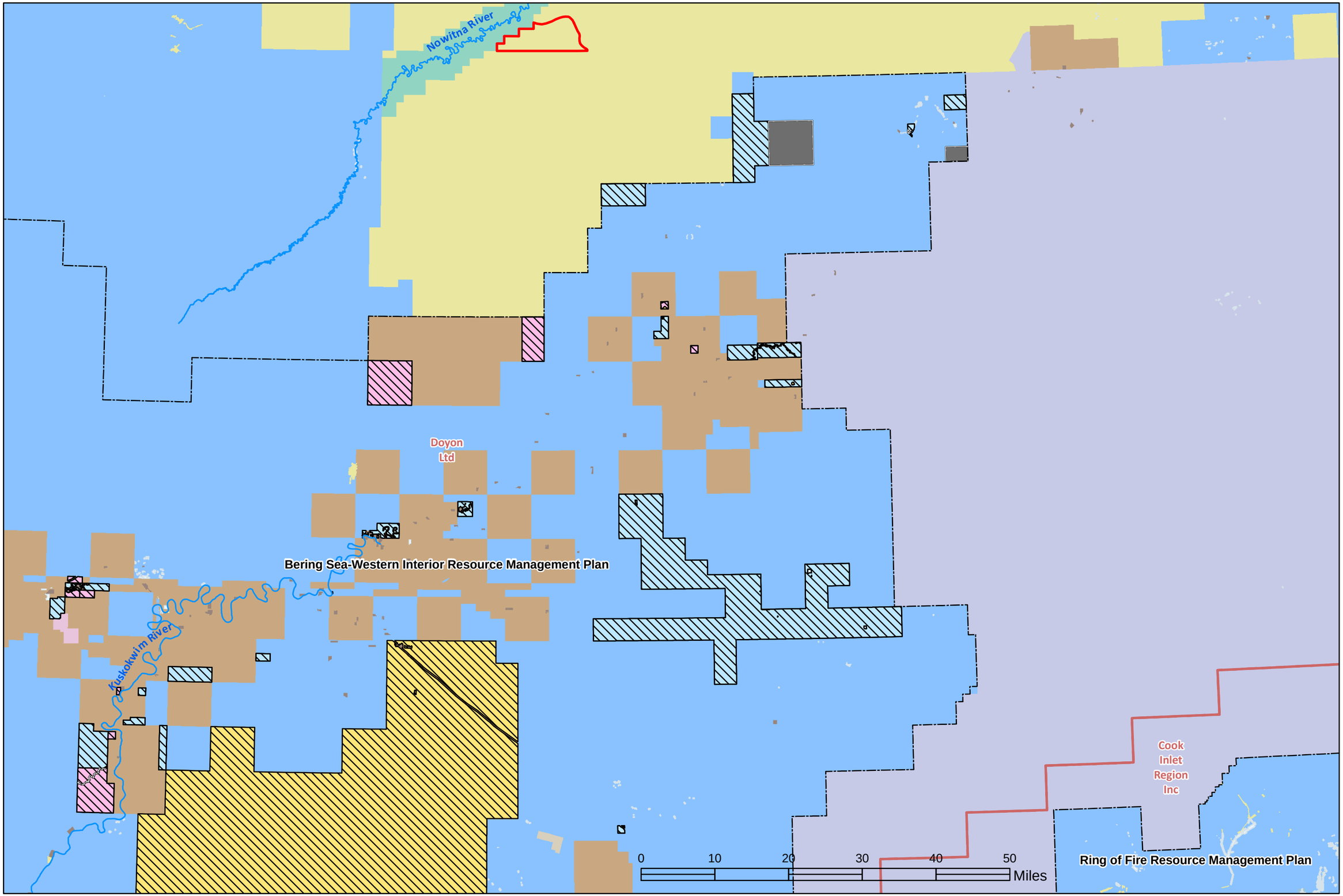
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- State Topfiling Priority 1 and 2 Lands Removed
- Calista Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4f

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA



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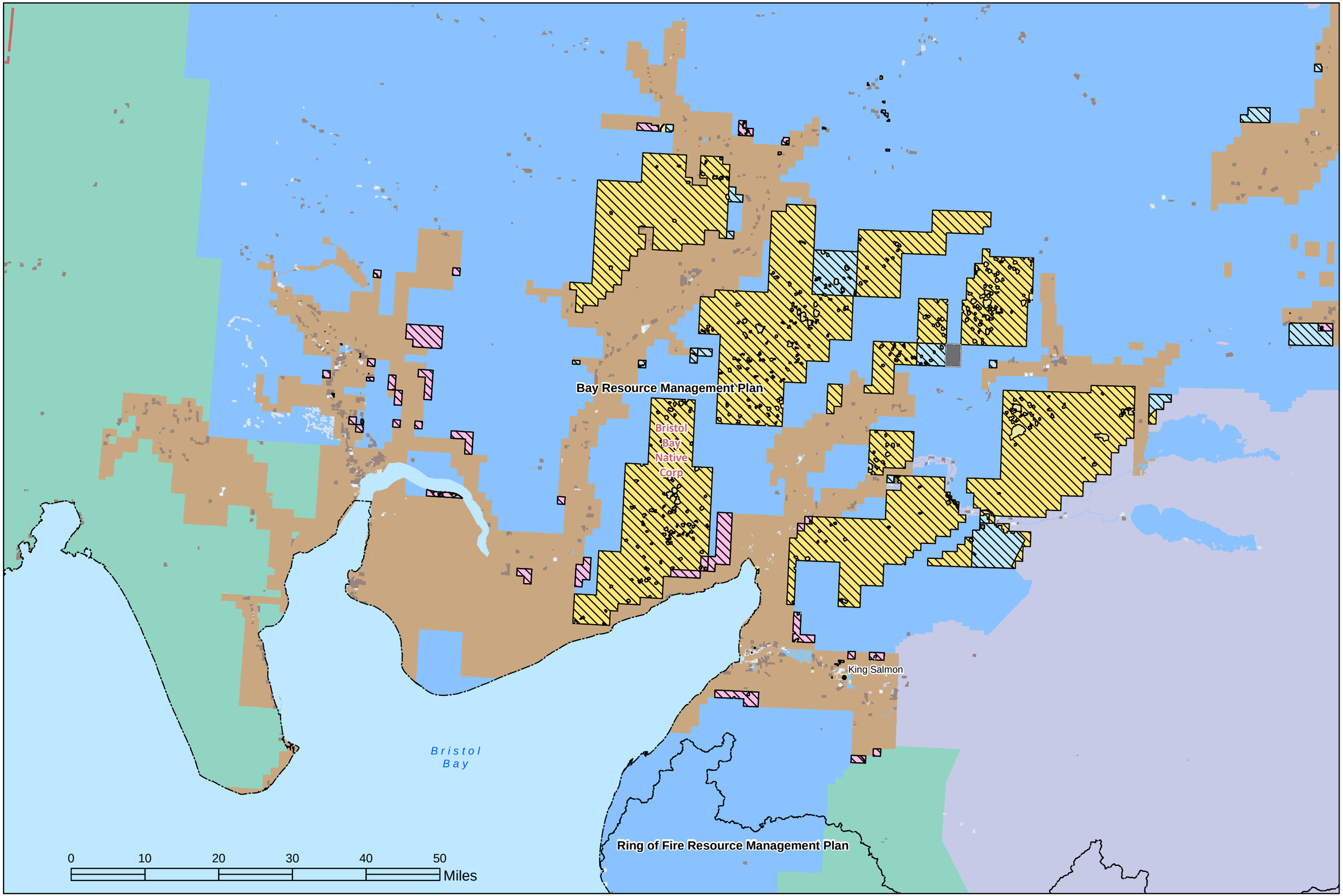
- Potentially Available - State Selections
- Area of Critical Environmental Concern (ACEC)
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4g

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

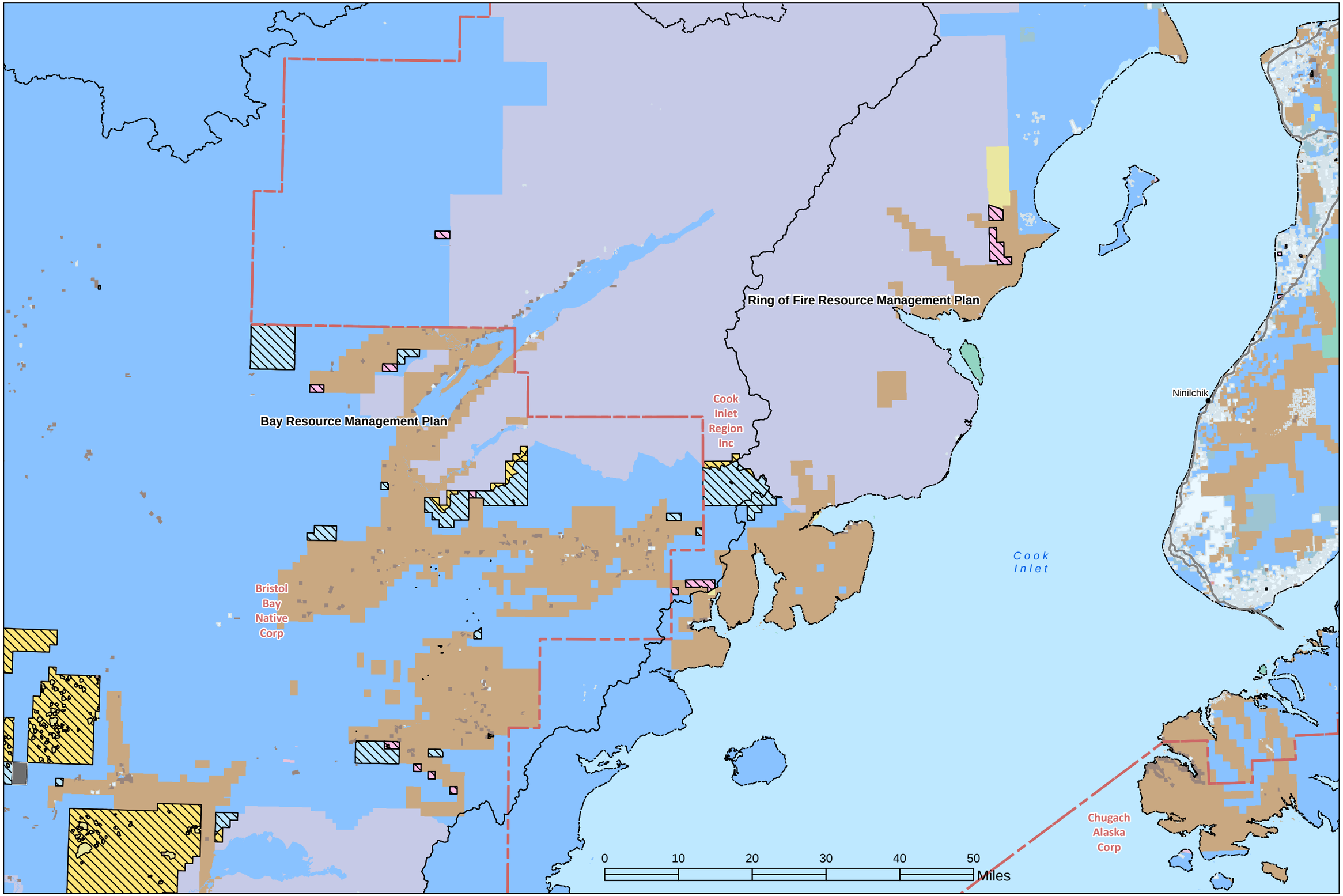


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4h

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

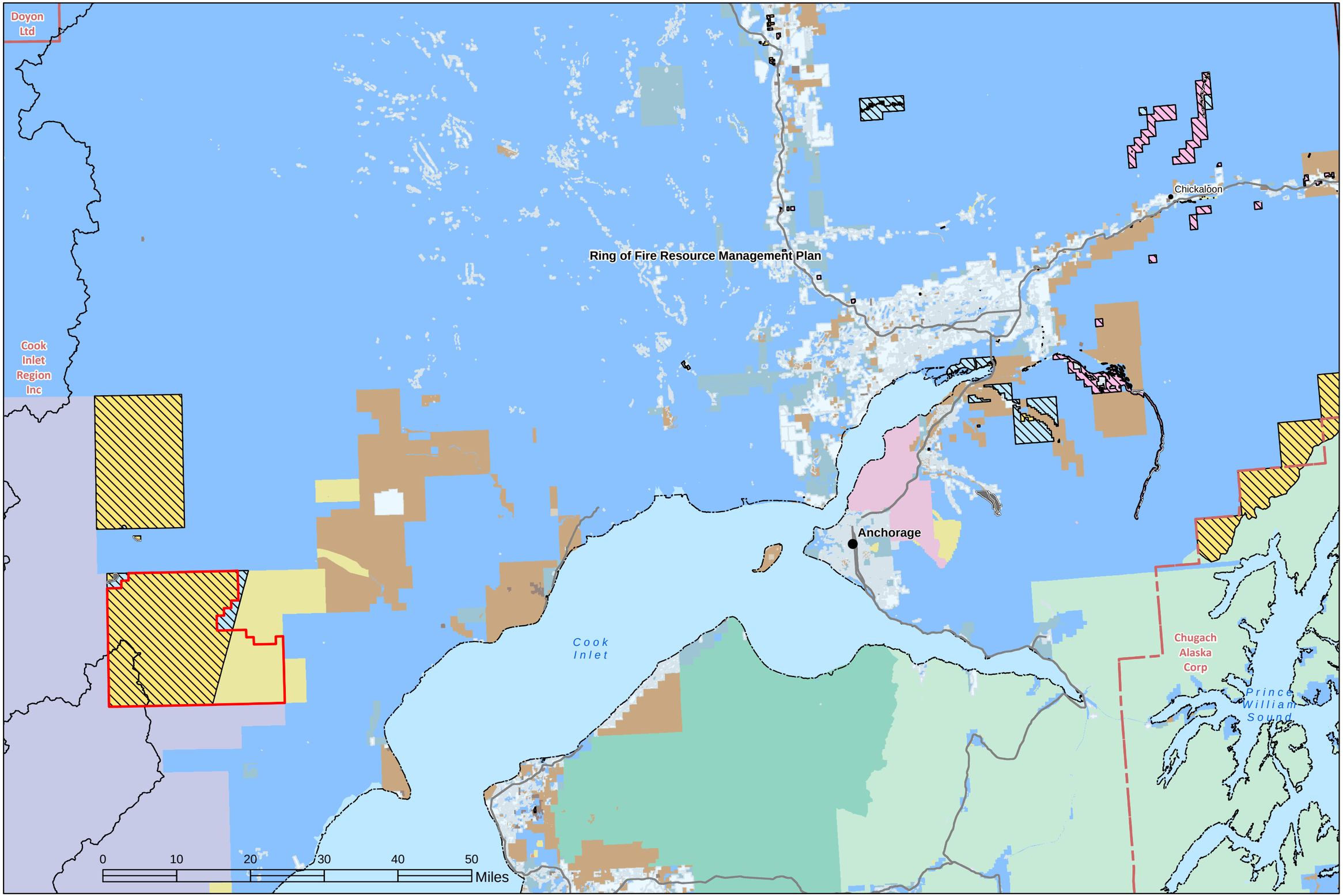


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4i

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

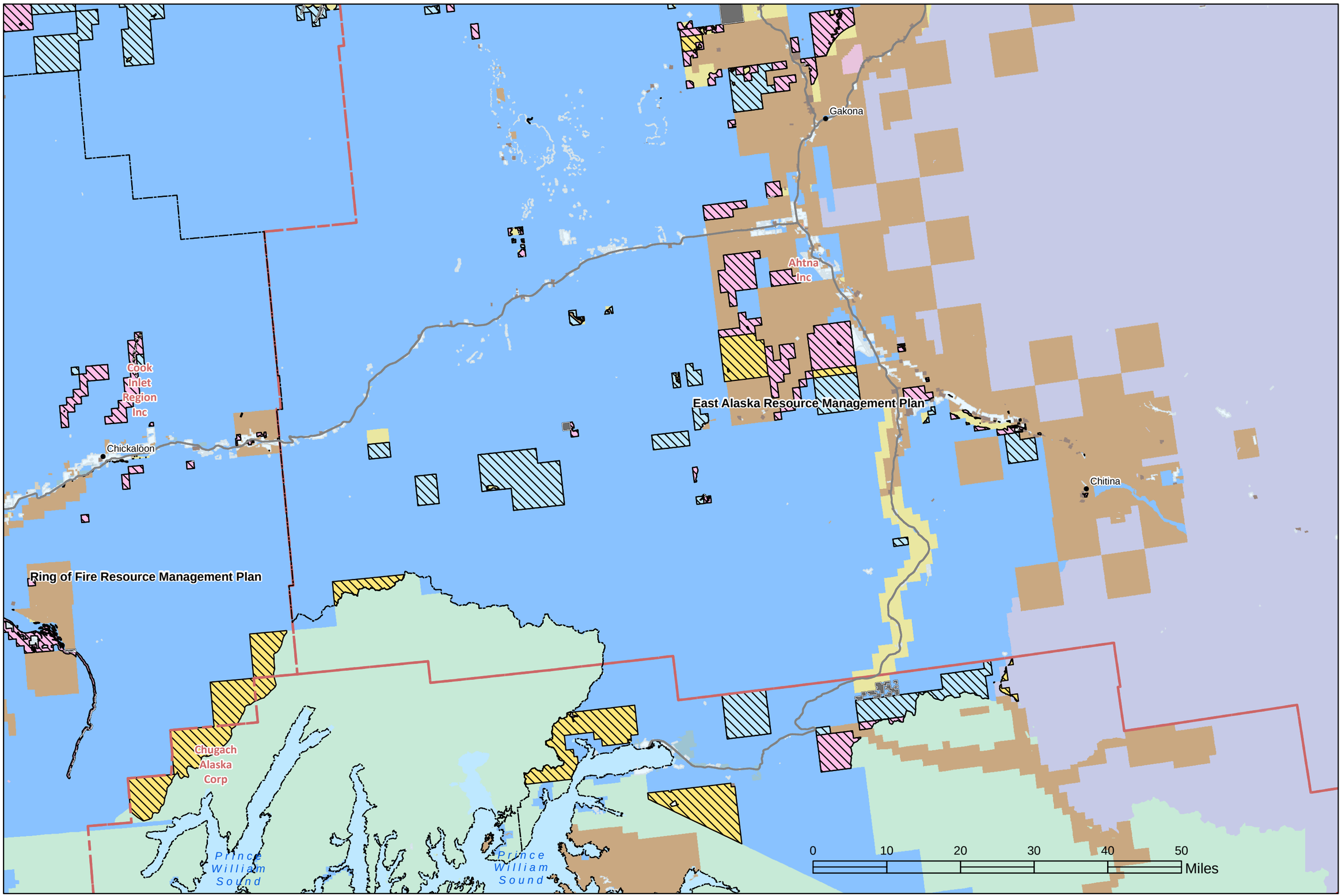


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- Forest Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4j

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

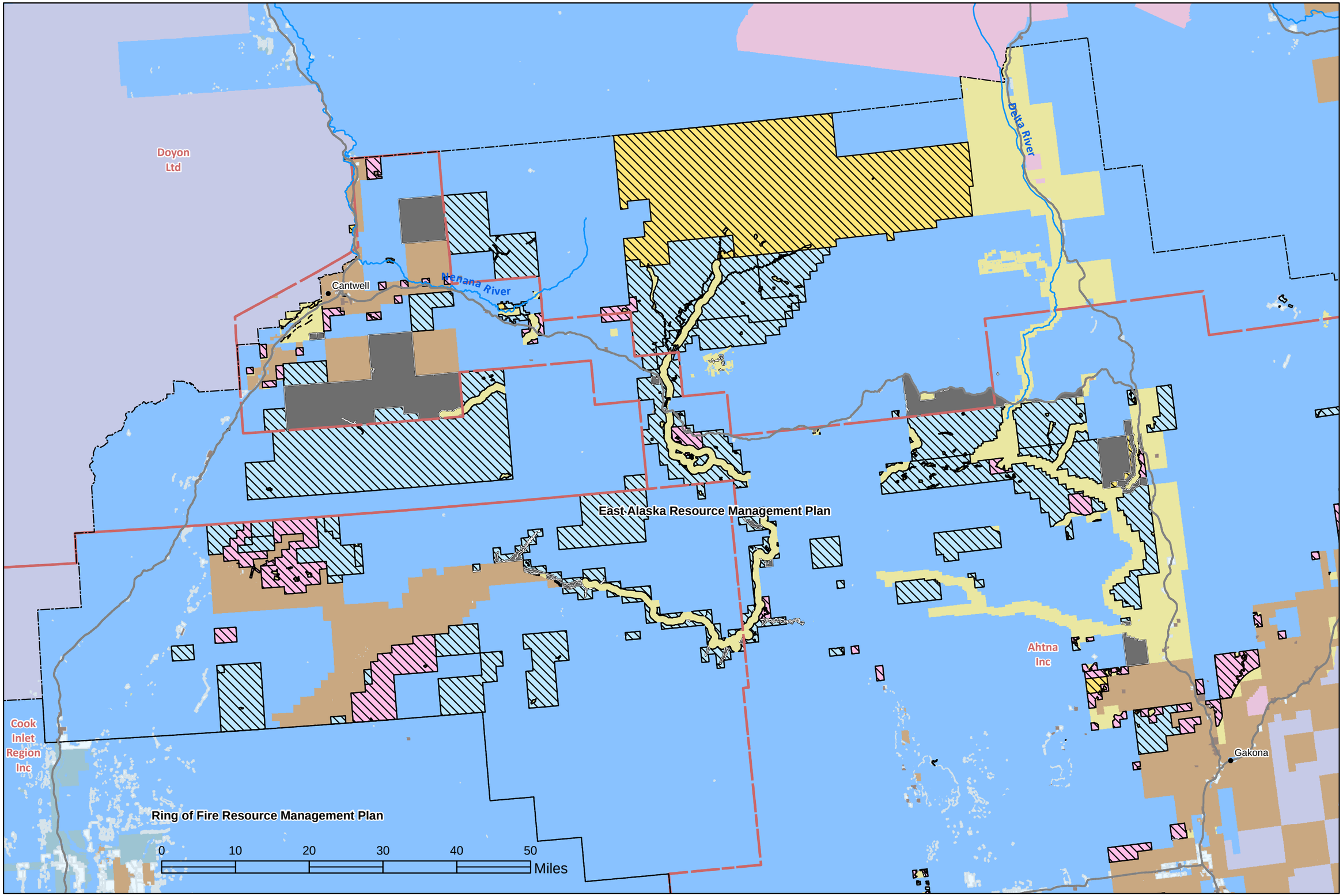


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- Area of Critical Environmental Concern (ACEC)
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Forest Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4k

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

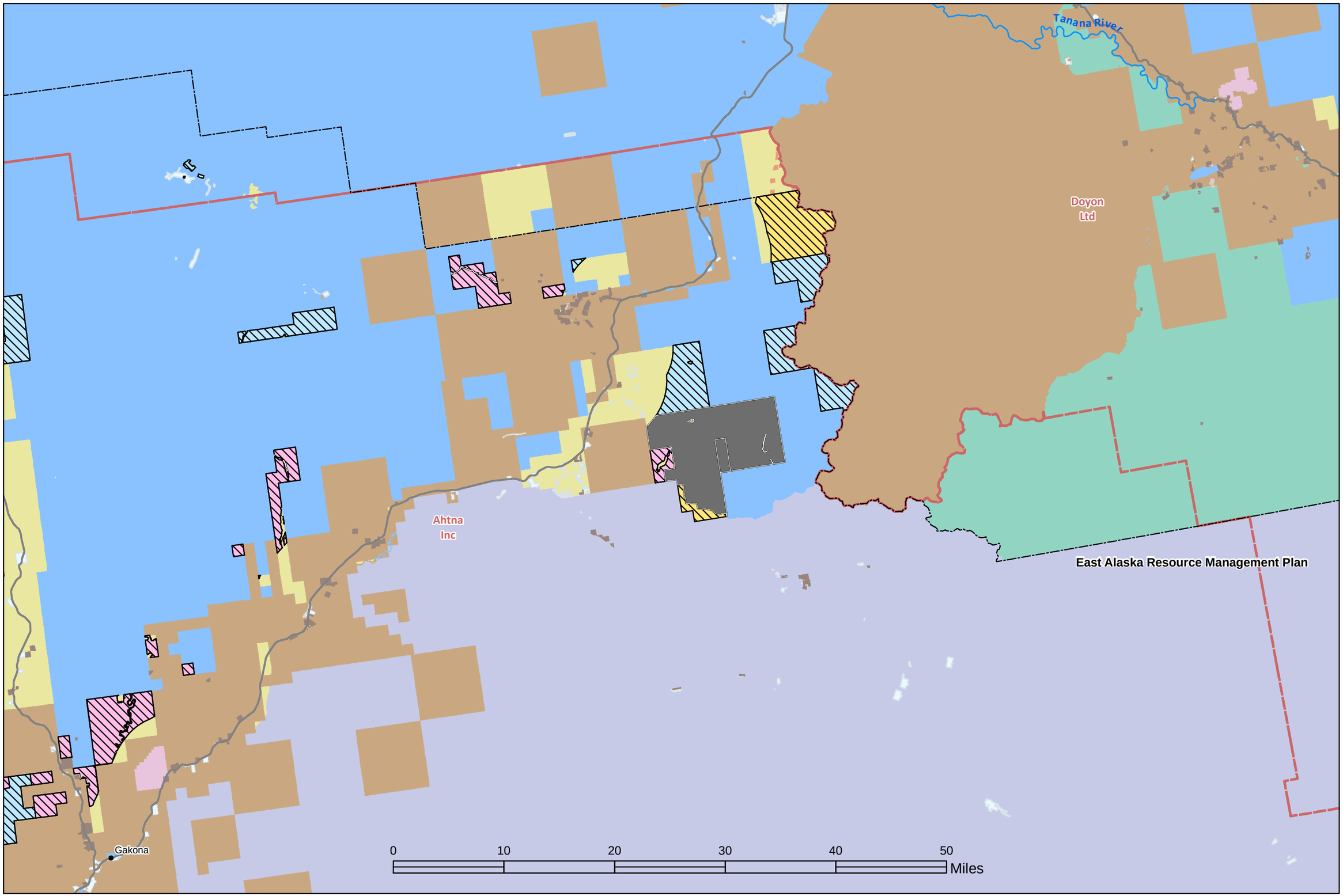


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4l

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

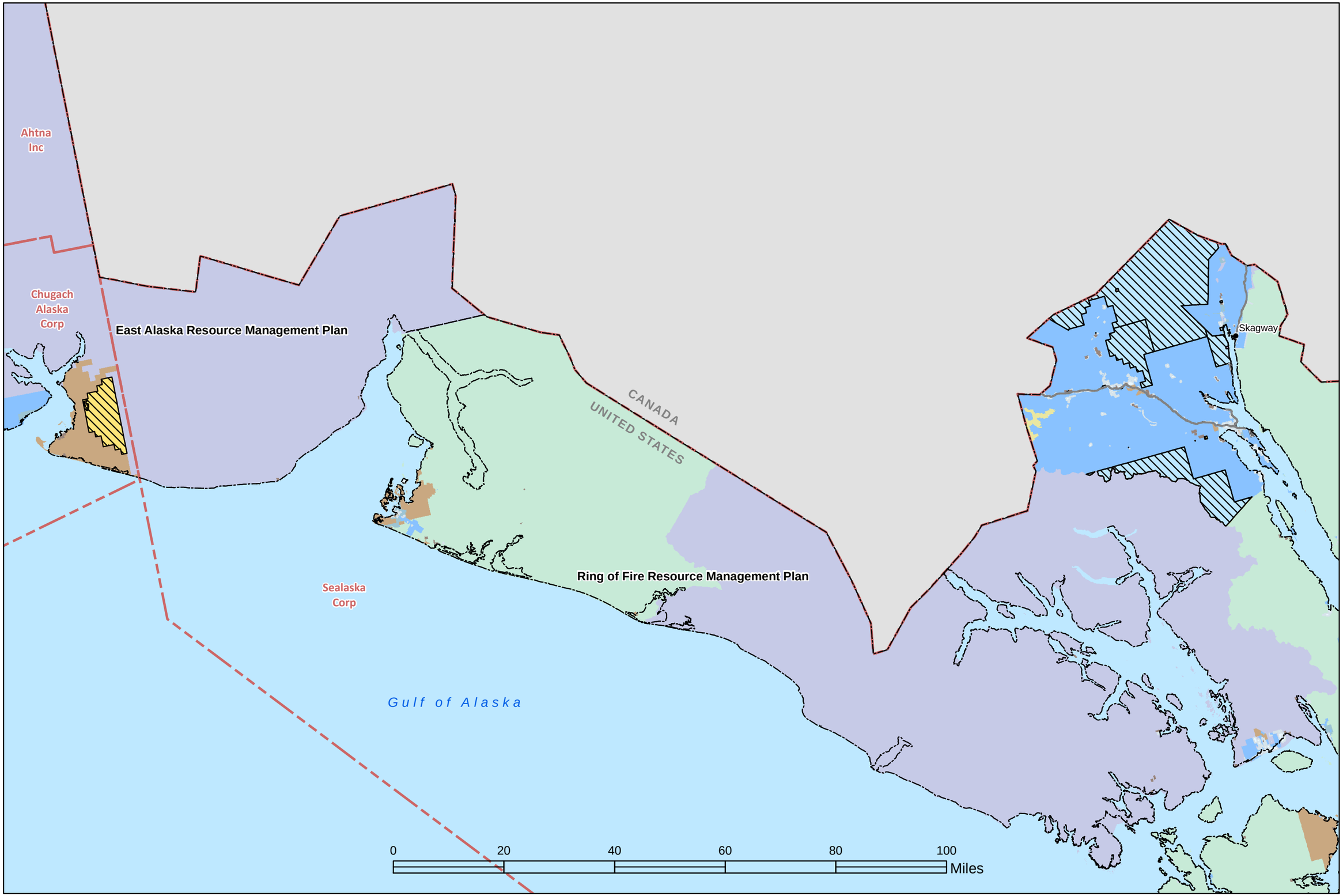


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Alternative C - Retain State of Alaska Top Filings and Lands Identified by the Calista Corporation - Map 4m

2/17/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA

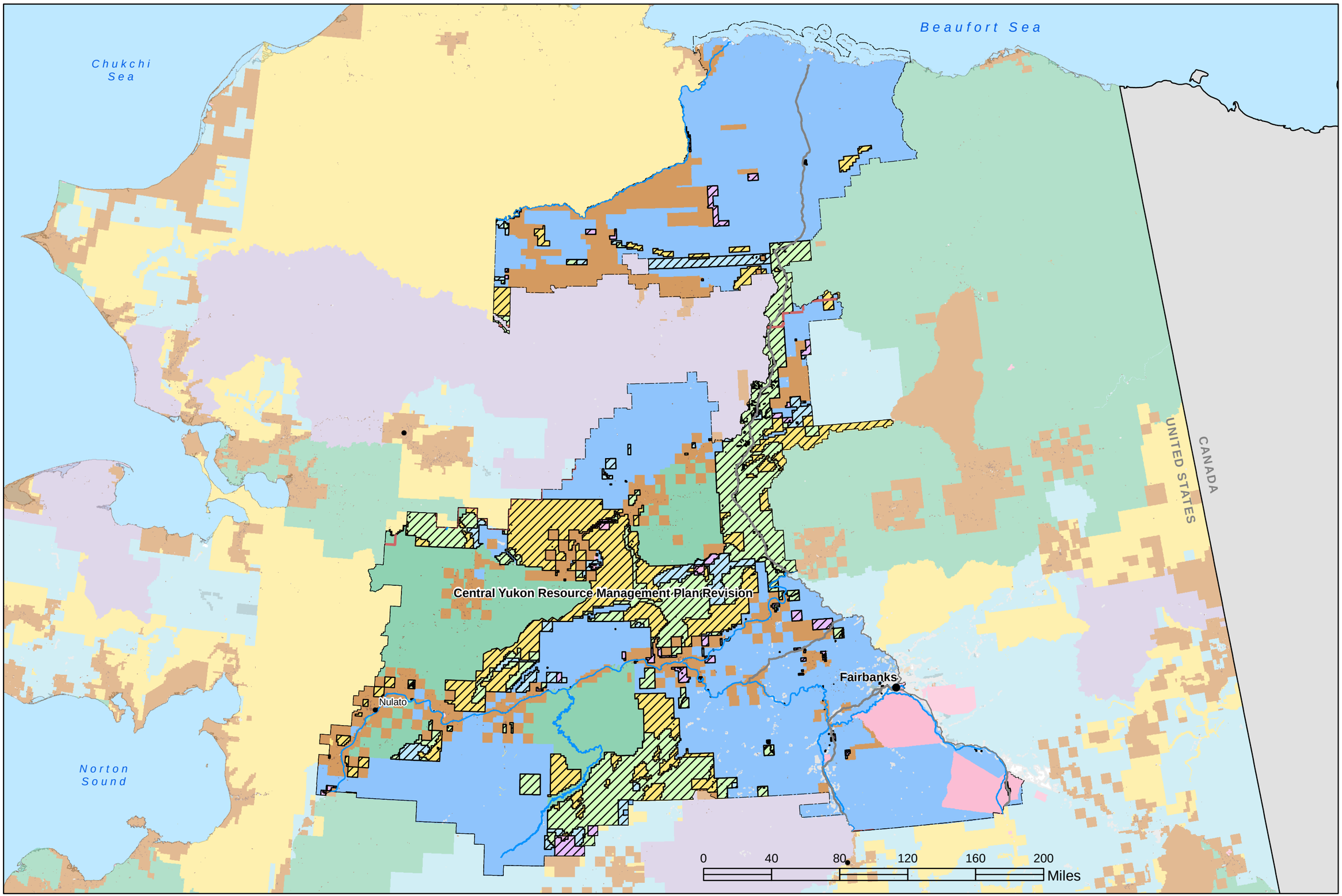


- Potentially Available
- Potentially Available - ANCSA Selected
- Potentially Available - State Selections
- Native Veteran Allotment Selections
- State Topfiling Priority 1 and 2 Lands Removed
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- Forest Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

Land Considered for Opening in the Proposed Central Yukon Resource Management Plan/Draft Environmental Impact Statement- Map 5

2/25/2022

U.S. DEPARTMENT OF THE INTERIOR | BUREAU OF LAND MANAGEMENT | ALASKA



- Potentially Available BLM Land after PLO Revocation
- Potentially Available Native Selected Land after PLO Revocation
- Potentially Available State High Priority Selected Land after PLO Revocation
- Potentially Available State Selected Land after PLO Revocation
- Potentially Available Native and State Selected Land after PLO Revocation
- Native Veteran Allotment Selections
- Bureau of Land Management
- Department of Defense
- Fish and Wildlife Service
- National Park Service
- Other Federal
- State
- Local Government
- Native Allotment
- Native Lands
- Private
- ANCSA Regional Corporation
- BLM Land Use Planning Boundary
- Highway

APPENDIX B

Tables

Table 10: Alternative B – Acres of Potentially Available Land Categorized by Land Status and PFYC

Land Status	Class 1 – Very Low	Class 2 – Low	Class 3 – Moderate	Class 4 – High	Class 5 – Very High	Class U – Unknown	Total
Potentially Available After PLO Review	2,210,000	184,000	7,126,000	698,000	3,000	9,140,000	19,361,000
Potentially Available After PLO Review – Native Selection	86,000	8,000	130,000	39,000	100,000	490,000	853,000
Potentially Available After PLO Review – State Selection	1,615,000	98,000	1,210,000	268,000	6,000	3,013,000	6,210,000
Potentially Available After PLO Review – State Top filing (Priority 1,2)	123,000	0	56,000	0	0	136,000	315,000
Potentially Available After PLO Review – Native and State Selection	1,000	0	0	0	0	17,000	18,000
Total:	4,035,000	290,000	8,522,000	1,005,000	109,000	12,796,000	26,757,000

Table 11: Alternative C – Acres of Potentially Available Land Categorized by Land Status and PFYC

Land Status	Class 1 – Very Low	Class 2 – Low	Class 3 – Moderate	Class 4 – High	Class 5 – Very High	Class U – Unknown	Total
Potentially Available After PLO Review	1,957,000	184,000	7,010,000	339,000	3,000	8,246,000	17,739,000
Potentially Available After PLO Review – Native Selection	85,000	8,000	129,000	36,000	100,000	455,000	813,000
Potentially Available After PLO Review – State Selection	1,470,000	98,000	1,189,000	196,000	6,000	2,682,000	5,641,000
Potentially Available After PLO Review – State Top filing (Priority 1,2)	0	0	0	0	0	0	0
Potentially Available After PLO Review – Native and State Selection	1,000	0	0	0	0	16,000	17,000
Total:	3,513,000	290,000	8,328,000	571,000	109,000	11,399,000	24,210,000

Table 12: BLM Alaska Special Status Plant Species

BLM SSS[2] - Plants	Description of Habitat[3]	Not Likely Present or Impacted (NLI) OR Potentially Present or Impacted (PI)
Antennaria densifolia	Subalpine slopes, alpine slopes, alpine ridges, rock outcrops; Medium-sized talus, scree, gravel, rocky soil, mineral soil; associated with calcareous substrates; Elevation from 600 to 1,580 m in Alaska and Yukon	NLI
Arnica lonchophylla ssp. Lonchophylla	River bars, river banks, mountain slopes, rock ledges; Rocky soil, gravel, sand; occasionally associated with calcareous substrates; Elevation known from 120 to 620 m in Alaska; 0 to 1,500 m elsewhere in North America.	NLI
*Artemisia globularia var. lutea**	Mountain slopes, summits, ridges, stream banks, and floodplains; Sand, gravel, scree; granite, schist; sometimes associated with acidic substrates; Elevation known from 10 to 340 m.	NLI
*Artemisia senjavinensis**	Mountain slopes, ridges, rock outcrops, beach slopes above high tide; Scree, gravel, sand; associated with calcareous substrates; Elevation known from 10 to 960 m in Alaska.	NLI
Botrychium spathulatum	Coasts, stabilized coastal dunes, upper beaches, riparian forests; Sand, gravel; Elevation known from near sea level to approximately 480 m in Alaska; 0 to 2,000 m elsewhere in North America.	PI
*Carex laxa**	Marshes, fens, pond margins, lake shores; Likely organic soil and mud; many species of Carex sect. Paniceae are often associated with calcareous substrates; Elevation known from 580 to 1,080 m in Alaska.	NLI
Carex parryana	Alkaline meadows, lake margins, roadsides, ditches; 200–2,500 m	PI
Claytonia ogilviensis	Open mountain slopes, alpine ridges; Scree; associated with calcareous substrates; Elevation known from 1,200 to 1,860 m in Yukon	NLI
Cochlearia sessilifolia	Shallow flats below high-tide line on sheltered coasts, estuaries; Fine gravel, mud, sand	NLI
Cryptantha shackletteana	River bluffs, rock outcrops, alpine ridges, alpine slopes; Scree, gravel, unstable rubble, rock faces; associated with calcareous substrates; Elevation from 250 to 1,500 m	NLI
Douglasia arctica	Alpine slopes, alpine ridges, subalpine slopes, rock outcrops, bluffs, cliffs; Scree, loam; associated with calcareous substrates; Elevation known from 180 to 1,350 m in Alaska.	NLI
Douglasia beringensis	Mountain slopes, solifluction slopes; Gravel; Elevation 100 to 420 m	NLI
Draba micropetala	Beach ridges, beach fronts, stream banks, frost scars; Sand, gravel; occurs on both acidic and basic substrates in Svalbard; Elevation near sea level to less than 10 m.	NLI
Draba murrayi	Rock outcrops, subalpine slopes, river bluffs, cliffs, ridges; roadsides; Rock, scree, loam; often associated with calcareous substrates; Elevation from 180 to 1,120 m in Alaska	PI
Draba ogilviensis	Alpine slopes, alpine ridges, plateaus; Typically associated with calcareous substrates; Elevation known from 760 to 1,280 m in Alaska; up to 2,200 m in Yukon.	NLI
Draba pauciflora	Coastal bluffs, river bars, pingos, hummocks; Sand, gravel; often associated with calcareous substrates but also found on acidic and carboniferous substrates; Elevation known from sea level to 20 m in Alaska.	NLI
Erigeron muirii	unknown	PI
Gentianopsis richardsonii	unknown	PI
Juncus articulatus	Wet ground in ditches, lake and stream margins, and a variety of other habitats, often a calciphile; 0--3000 m	NLI
Mertensia drummondii	Active sand areas near rivers (not sea shores or river banks), including blowouts and dunes; Usually sand, less commonly gravel; Elevation known from near seal level to 100 m in Alaska.	NLI

BLM SSS[2] - Plants	Description of Habitat[3]	Not Likely Present or Impacted (NLI) OR Potentially Present or Impacted (PI)
Micranthes nelsoniana ssp. insularis	unknown	PI
Micranthes porsildiana	Rock outcrops, alpine slopes, alpine ridges, rocky seeps, stream banks; occurs obligately in late-melting snow areas in Chukotka Peninsula; Mineral soil, scree, rock; known to occur on both ultramafic and acidic substrates; Elevation known from 40 to 2,050 m in Alaska; up to 2,500 m elsewhere in North America.	NLI
Orobanche uniflora	unknown	PI
*Oxytropis kokrinensis**	Alpine ridges, alpine valleys; Scree, sand; found at one location on acidic substrate and another location on calcareous substrate but not typically associated with calcareous or ultramafic substrates; Elevation known from 200 to 1,380 m.	NLI
Papaver gorodkovii	River floodplains, gravel bars, rock outcrops, polygon tundra; Clay, sand, gravel, scree, rubble; sometimes associated with calcareous substrates; Elevation known from near sea level to 1,060 m in Alaska	NLI
Parrya nauruaq	Floodplains, badlands slopes, rock outcrops, river bluffs; Gravel, sand; associated with calcareous substrates, primarily marble but also limestone; Elevation near sea level to 180 m.	NLI
Pedicularis hirsuta	Beach terraces, tundra; also in late melting snow areas in Russia and Canada; Likely organic soils; associated with basic substrates in mountains of Scandinavia but not associated with calcareous substrates in the arctic; Elevation known from near sea level to 20 m in Alaska	PI
Phacelia mollis	Alpine slopes, river bluffs, rock outcrops, river bars, lake shores; also on roadsides and cut banks along Alaska and Taylor Highways; Mineral soil, sand, gravel, scree, rubble; Elevation known from 220 to 1,920 m in Alaska.	NLI
Physaria calderi	Mountain slopes, mountain ridges, rock outcrops; Scree, rock; associated with calcareous substrates; Elevation known from 540 to 1,360 m in Alaska; occurs up to 1,500 m in Yukon and Northwest Territories.	NLI
Pleuropogon sabinei	Lakeshores, stream banks, river banks, floodplains, marshes, mud flats; always found close to bodies of water; Mud, silt, clay, gravel; Elevation known from near sea level in Alaska; known from up to 700 m on Ellesmere Island in the Canadian Arctic Archipelago.	NLI
Poa hartzii ssp. alaskana	Rivers bars, floodplains, active sand dunes; Sand, silt; Usually occurs from near sea level to 20 m; known from up to 860 m in the eastern Brooks Range.	NLI
Poa macrantha	unkown	PI
Poa porsildii	Alpine slopes, alpine ridges, subalpine slopes, seepage slopes, rock outcrops; Scree, gravel; usually associated with calcareous substrates; Elevation known from 900 to 1,480 m in Alaska; up to 1,680 m in Yukon.	NLI
Poa sublanata	unknown	PI
Podistera yukonensis	Mountain slopes, river bluffs, rock outcrops; Scree, rock; less abundant or absent where bedrock is deeply buried in scree; associated with calcareous substrates or shale; 50 to 1,280 m in Alaska; Elevation up to 2,280 m in Yukon.	NLI
Potentilla fragiformis	sand dunes, coastal gravel bars, beach ridges; 0–10 m	NLI
*Primula tschuktschorum**	Stream banks, subarctic lowlands, wet meadows, alpine slopes, solifluction slopes, frost boils, pond shores, lake shores; Sand, mud, gravel, cobbles, scree, boulders; occurs on both calcareous and acidic substrates; Elevation known from 40 to 950 m in Alaska.	NLI
Puccinellia banksiensis	unknown	PI
Puccinellia vaginata	unknown	PI
Ranunculus pacificus	Along streams and in meadows; 0 m	NLI

BLM SSS[2] - Plants	Description of Habitat[3]	Not Likely Present or Impacted (NLI) OR Potentially Present or Impacted (PI)
Ranunculus ponojensis	Alpine slopes, subalpine slopes, stream banks; Organic soil; sometimes associated with limestone substrates; Elevation known from 10 to 580 m in Alaska.	NLI
Ranunculus turneri ssp. turneri	Stream banks, stream terraces, subalpine slopes, seepage slopes, late-melting snowbeds; Sand, gravel, cobbles; associated with calcareous or mafic (basalt) substrates; Elevation known from near sea level to 1,400 m in Alaska; occurs at similar elevations in Yukon and Russian Far East.	NLI
Romanzoffia unalaschcensis	unknown	PI
Rumex aureostigmaticus	Sand areas along river banks, including sand dunes; also on slopes near timberline in arctic Russia; Sand; Elevation known from near sea level to 40 m in Alaska; occurs at least up to 120 m in Russian Far East.	NLI
Rumex beringensis	Alpine slopes, alpine ridges, recently de-glaciated areas, late melting snow beds, ephemeral ponds, lake shores, stream banks; Sand, volcanic ash, silt, gravel, alluvial deposits; often on volcanic substrates; Elevation known from near sea level to 1,720 m in Alaska;	NLI
Rumex krausei	Alpine slopes, frost scars, river terraces; Clay, sand, mineral soil, gravel; often associated with calcareous substrates; Elevation near sea level to 360 m in Alaska.	PI
Smelowskia johnsonii	Alpine slopes, alpine ridges; Talus, scree, unconsolidated rubble; associated with calcareous substrates.	NLI
*Smelowskia pyriformis**	Alpine slopes, alpine ridges; Usually in scree or unstable rubble, less commonly in talus; associated with both calcareous and non-calcareous (including shale and sandstone) substrates; Elevation known from 200 to 1,700 m.	NLI
Symphyotrichum pygmaeum	River terraces, river banks, dunes, pingos; often associated with areas that are regularly disturbed by natural processes; Sand, silt; Elevation known from near sea level to 40 m in Alaska; known from up to 220 m in arctic Canada.	NLI
*Symphyotrichum yukonense**	River bars, river terraces, floodplains, sand blowouts, sand dunes, stream beds; Sand, silt, gravel; Most occurrences in Alaska are known from 40 to 380 m in elevation	NLI

Table 13: BLM Alaska Special Status Wildlife Species

Common Name	*Genus species*	Habitat (from ACCS Conservation Status Assessments unless otherwise noted)	Range in Alaska (from ACCS Conservation Status Assessments unless otherwise noted)	Not Likely Present (NLP), Potentially Present – Potentially Impacted (PI)^
BIRDS				
Kittlitz's Murrelet	*Brachyramphus brevirostris*	Nests on barren ground in scree fields, talus slopes, mountainsides, and cliff ledges. In southcoastal and southwestern Alaska, often associated with glaciers. Also nests on rocks or in depressions on the ground in sparsely vegetated habitat typically consisting of nonvascular plants (lichens, mosses), dwarf-shrub, or short graminoids). Kittlitz's murrelet select for unvegetated or sparsely vegetated areas, though vegetation cover varies from none to >50%. Moreover, nests have been reported from a wide range of elevations (from ~130 m to >2,500m) and a wide range of distances from shore (from ~200m to >70 km inland), and habitat affiliations suggest that the choice of nesting habitat varies with availability and is likely not limited. Typically forages nearshore in protected bays and fjords, but in some areas forages in open water several kilometers from shore. Infrequently seen on freshwater lakes. Wintering distribution and habitat associations are largely unknown, though this species likely overwinters offshore on open water.	Widespread, though disjunct, breeding distribution throughout most of Alaska's coastline from southeast Alaska to Cape Lisburne in northwestern Alaska. Also breeds on the Kodiak Archipelago and some Aleutian Islands. Usually forages in protected waters, but also forages on open water several kilometers from shore. Non-breeding distribution includes open water areas in the Gulf of Alaska and the Bering and Chukchi Seas. Not enough data are available to estimate range size during winter.	PI
Dusky Canada Goose	*Branta canadensis occidentalis*	Restricted to coastlines in southcoastal Alaska. Breeds in tidal and freshwater wetlands (Bromley and Rothe 2003; PFC 2015). Within these broad habitat types, preferences vary over time and space (Campbell 1990). Some researchers have noted that geese prefer to nest in open habitats, while others found that they readily nest in tall shrub cover or under conifers (reviewed in Bromley and Rothe 2003; PFC 2015). Habitat is prone to disturbances and changes in quality e.g., due to earthquakes or spring snowmelt (Bromley and Rothe 2003; PFC 2015).	Breeds on the Copper River Delta, on Middleton Island, and in Prince William Sound. Most of the population overwinters outside of Alaska in Oregon and Washington. Breeding range is estimated to cover 4,015 sq. km, calculated in GIS and based on range map from ACCS (2021).	NLP
Smith's Longspur	*Calcarius pictus*	Preferred habitat in northern Alaska is moist tussock meadows in wide alpine valleys, often surrounding lakes. In central Alaska, prefers dry ridge top tundra (Kessel and Gibson 1978).	Brooks Range and northern foothills (ACCS 2021).	NLP

Common Name	*Genus species*	Habitat (from ACCS Conservation Status Assessments unless otherwise noted)	Range in Alaska (from ACCS Conservation Status Assessments unless otherwise noted)	Not Likely Present (NLP), Potentially Present – Potentially Impacted (PI)^
Dunlin *arcticola*	*Calidris alpina arcticola*	Breeds in coastal graminoid tundra habitats. Typically associated with wet or moist moisture regimes, though nests are often placed on drier or upland sites. Post-breeding, found on intertidal habitats such as mudflats, estuaries, and bays. On migration and wintering grounds outside of Alaska, found mainly on tidal flats, but also use aquaculture ponds.	Found along Alaska's northern coast from the Canadian boundary to the Lisburne Peninsula. Range limits are unknown, especially in western Alaska where its range overlaps with that of *C. a. pacifica*. However, recent geolocator work revealed that birds breeding near Kotzebue belonged to pacifica subspecies; it is assumed that the dividing line between the two species is therefore north of Kotzebue. Overwinters in Japan, China, South Korea, and North Korea.	PI
Red Knot	*Calidris canutus roselaari*	During breeding season, they are associated with alpine and sparsely vegetated dwarf-shrub tundra habitats, often at elevations >100m in sloping terrain such as terraces, ridges, and domes. Little is known about habitat associations on the North Slope. During migration, they are associated with inter-tidal habitats such as deltas, beaches, and mudflats. Given its restricted, coastal distribution and nesting requirements, we rank this species as A- Not Adaptable.	Disjunct distribution. The primary breeding range in Alaska includes the western Brooks Range and the Lisburne Hills, insular mountain ranges in Cape Krusenstern National Monument and Noatak National Preserve (Kessel and Gibson 1978), and the Seward Peninsula. The red knot does not overwinter in Alaska.	PI
Bering Sea Rock Sandpiper	*Calidris ptilocnemis tschuktschorum*	During non-breeding, forages primarily in rocky intertidal zones and has been observed roosting on piers and other anthropogenic structures. During breeding, inhabits both low-lying and alpine tundra meadows dominated by dwarf shrub or dwarf shrub-graminoid vegetation. Usuallys nests close to the coast, though nests have also been found further inland as well as near human settlements.	Breeds on Nunivak and St. Lawrence Islands and along the coasts of the Yukon-Kuskokwim Delta and the Seward Peninsula. Winter range is most restricted: in Alaska, overwinters from Prince William Sound to southeast Alaska.	PI
Buff-breasted Sandpiper	*Calidris subruficollis*	Restricted to the Arctic tundra, typically 80 to 120 km from the coast. Typically nests on dry or upland graminoid meadows such as ridges and bluffs, though nests in wetter habitats have also been documented. When foraging and later in the breeding season, uses riparian and wetlands habitats. Researchers in Alaska and eastern Russia have contended that habitats supporting *C. subruficollis* were rare.	Breeds along the coast from Point Barrow east to Canada. Overwinters in South America.	NLP

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Olive-sided Flycatcher	*Contopus cooperi*	Associated with wetlands, wooded edges near lakes or streams, and open-canopied habitats e.g., early successional forests, recent burns, logged stands that contain a mix of snags and standing live trees. Nests are constructed on tree branches at various heights above ground.	In Alaska, the shrinking and drying of boreal wetlands and lakes is thought to be decreasing habitat. The effects of other, climate-related changes are less certain. For example, forest fires can either create or destroy habitat depending on their size and frequency. Similarly, spruce bark beetle outbreaks, which may increase due to climate change, may also impact habitat quality and extent.	PI
Rusty Blackbird	Euphagus carolinus	Associated with wet coniferous and mixed forests from northern edge of tundra southward to beginning of deciduous forests and grasslands. Frequents fens, alder (*Alnus*)–willow (*Salix*) bogs, muskegs, beaver ponds, and other openings in the forest such as swampy shores along lakes and streams. In Alaska, nests primarily in low (3-6 m), dense black spruce forests, but also in willows near water.	Potentially all boreal forest in Alaska (ACCS 2021).	PI
Yellow-billed Loon	*Gavia adamsii*	Nests on the tundra north of the treeline. Nest-site selection is quite specific: of the 1,291 lakes surveyed in northwestern Alaska, yellow-billed loons used only ~33% of these, compared to ~67% for Pacific Loons. Nests are often in low-lying areas on the shoreline of large, deep lakes. On the Arctic Coastal Plain, yellow-billed loons nested on islands and peninsulas that were sheltered from wind, waves, and predators.	Patchily distributed north of the Brooks Range on the Arctic Coastal Plain and along the coastlines of the northern Seward Peninsula; also breeds on St. Lawrence Island. Estimated breeding range is al. Individuals that breed in Alaska overwinter in eastern Asia. Yellow-billed loons have been sighted in the winter in southcoastal and southeast Alaska, but these individuals likely belong to populations that breed in Canada. We therefore do not consider wintering range or habits in this assessment.	PI
Red-throated Loon	*Gavia stellata*	Limited knowledge of habitat associations. In Alaska, nests in coastal tundra habitats and at lower densities along shorelines of small ponds and lakes. Also nests on alpine lakes in British Columbia, where nests were found on lakes that ranged in size from 1 to 112 ha. Overwinters in coastal waters, but specific habitat requirements have not been studied.	Breeds along coastlines from southeast Alaska north to the Arctic Coastal Plain, though most common in northern and western Alaska. A small portion of the population also breeds in interior Alaska. Individuals that breed in Alaska overwinter as far south as Mexico and Japan, though some remain in Alaska. Wintering range is restricted to the Aleutian Islands and the Gulf of Alaska.	PI

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Marbled Godwit	*Limosa fedoa beringiae*	During breeding, found in moist and wet meadows dominated by graminoids, dwarf shrub and open low shrub. Godwits prefer dwarf shrub-willow habitats. Foraging and staging areas in Alaska are along estuaries and tidal flats.	During breeding, concentrates at less than 25 sites on the Alaska Peninsula. During spring migration, heavily concentrated in Controller Bay, at the far eastern edge of the Copper River Delta. Cinder/Hook and Ugashik Lagoons are particularly important sites during spring, summer, and fall.	PI
Hudsonian Godwit	*Limosa haemastica*	Typically nests in freshwater wetlands including graminoid marshes, spruce bogs, and mixed wood wetlands. On the Yukon-Kuskokwim Delta, also found in dwarf-shrub tundra meadows several kilometers away from wetlands. Individuals nesting near the coast forage in intertidal habitats. During spring and fall migration, stages on intertidal habitats and inland lakes. Despite their seemingly varied habitat preferences, Hudsonian godwits are patchily distributed on the landscape and do not occupy all suitable sites. The reasons behind this spatial pattern are unknown.	Distribution and range limits are not well-known. Breeding has been documented in southcentral Alaska in the upper Cook Inlet region, in western Alaska on the Yukon-Kuskokwim Delta and the Seward Peninsula, and in northern interior Alaska. Nearly the entire Alaskan breeding population overwinters on Isla Chiloé in Chilé.	PI
Bar-tailed Godwit	*Limosa lapponica*	Nests on the tundra in dwarf-shrub meadows at low to mid elevations (sea level up to >400m). Reported from a range of moisture levels and distances from the coast (up to >100km inland). During staging in western Alaska, uses intertidal areas with mud or sand substrates. Birds staging in northern Alaska use wet sedge meadows rather than tidal flats. In all cases, godwits require staging areas that support high densities of marine invertebrates.	During autumn migration, >60% of the entire population stages along a 175 km strip in the southern Yukon-Kuskokwim Delta, while >30% stages at Egegik Bay on the Alaska Peninsula. Large concentrations have also been seen in the central Yukon Kuskokwim Delta (from the Tutakoke River to Kokechik Bay) and at other estuaries on the Alaska Peninsula including Nelson Lagoon and Port Heiden. Number of sites <25.	PI
Whimbrel	*Numenius phaeopus rufiventris*	During breeding, inhabit dwarf-shrub tundra meadows and nest on tussock mounds, often near water. In interior Alaska, nest sites may be in tundra patches within a larger boreal forest habitat. Nesting habitat appears flexible, but there are limited data for Alaska. Interestingly, whimbrels are patchily distributed even within landscapes of suitable habitat, suggesting that additional habitat requirements or social factors may be at play. During spring and fall migration, stage along the coast and forage in intertidal zones.	Aggregate in small flocks in coastal areas during fall migration including along the Yukon Kuskokwim Delta south to the Gulf of Alaska and west to the Aleutian Islands. Number of staging areas is unknown, but given population size and size of flocks i.e., up to a few thousand but usually much smaller ie. 25 or less, number of sites is estimated to be >250.	PI

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Eskimo Curlew (ESA E)	*Numenius borealis*	Treeless, dwarf shrub, graminoid tundra complex habitat within arctic and subarctic phytogeographic regions of Canada and possibly Alaska.	Likely extinct. Not seen in since 1963.	NLP
Bristle-thighed Curlew	*Numenius tahitiensis*	Breed at low elevations in open tundra habitat. Habitats span a range of moisture regimes and vegetation types, and include dry lichen-graminoid meadows, wet sedge meadows, tussock-shrub, and shrub thickets up to 1.5 m high. Habitat preferences differ between sites but are largely reflective of availability and distribution of food resources. Habitat during migration is poorly described, but individuals seem to move towards the coast.	Breeding is known from only two disjunct areas in Alaska: the north-central Seward Peninsula and the southern Nulato Hills on the Yukon-Kuskokwim Delta. Other small breeding areas may exist, based on observations during the summer months at Cape Krusenstern, but no nests have been found. Overwinters on Pacific islands from the northwestern Hawaiian Islands south to Fiji.	PI
Aleutian Tern	*Onychoprion aleuticus*	Nesting colonies are typically restricted to coastal sites such as islands, mudflats, and estuaries, though within this habitat they seem to prefer upland sites further for shore. Nest in dense vegetation dominated by graminoid or dwarf shrub meadows. In the Gulf of Alaska, only found on a small strip of vegetation near mudflats; the patchy, concentrated distribution of these colonies suggest a strong degree of habitat specialization, though nesting habitat is not believed to limiting. Forages in offshore and nearshore marine waters and occasionally freshwater ponds.	Widely distributed along much of Alaska's coastline, from Glacier Bay north along the coast to the Chukchi Sea. Also found on several islands including the Kodiak Archipelago, the Aleutian Islands as far west as Attu Island, and Nunivak Island.	
McKay's Bunting	*Plectrophenax hyperboreus*	McKay's Bunting breeds on vegetated tundra and rocky uplands (rock talus and rock fields) on both islands that it occupies; earlier reports of breeding most commonly on rocky beaches, and coastal cliffs, and shores of coastal lakes and ponds, were not based on systematic sampling. Winters on coastal marshes, shingle beaches, and agricultural fields with exposed vegetation.	Wintering on Seward Peninsula and south withing approximately 30 miles of the coast to the Kuskokwim Delta. Only breeding on St Matthew and Hall Islands (ACCS 2021).	PI
Gray-headed Chickadee	*Poecile cinctus lathami*	Few data available for Alaska. Across its range, inhabits boreal, and particularly spruce, forests near the treeline. Appears to be most common in open canopy forests and tall shrub thickets. Nests are constructed in natural or abandoned tree cavities, and nest boxes where available.	Breeds and overwinters in western and central Alaska. Its distribution in Alaska is uncertain, but it is thought to occur along the southern edge of the Brooks Range east to Canada. Older records suggest it may also occur in interior Alaska between the upper Tanana and Yukon rivers. May range as far south as the Nulato Hills.	PI

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Steller's Eider (ESA T)	*Polysticta stelleri*	Nests in low-lying tundra on grassy edges of shallow lakes and ponds, near streams, and on flooded wetlands. Nest sites are often associated with pendant grass (*Arctophila fulva*) or water sedge (*Carex aquatilis*). During molting, uses intertidal habitat in shallow estuaries and lagoons. Eelgrass habitat, sand flats, and mudflats are often frequented, possibly because they harbor high levels of prey items. Little is known about the wintering habitat, but recent research suggest that they use deep (>30 m) offshore waters.	During breeding, nesting density is highest in the northern portion of the Utqiaġvik Triangle, though individuals occur at low densities on the Arctic Coastal Plain and on the Yukon-Kuskokwim Delta. During molting, most of the population concentrates at a handful of sites on the Alaska Peninsula, as well as on St. Lawrence Island. Observations indicate there are six molting areas used by individuals overwintering on Kodiak Island, and five such areas for birds breeding in Utqiaġvik.	PI
Spectacled Eider (ESA T)	*Somateria fischeri*	Breeds in coastal areas on wetlands, salt marshes, and sedge meadows; habitat is often associated with freshwater such as ponds, lakes, and rivers. Wintering habitat is highly specialized and subject to natural disturbances. Winters in open water on ice leads in the northern Bering Sea in areas with a high abundance of clams. Availability of sea ice for roosting may be particularly important for reducing energetic costs. Wintering habitats are dynamic and highly variable, changing both seasonally and inter-annually.	Breeding is restricted to the Yukon-Kuskokwim Delta and the Arctic Coastal Plain. Historical records suggest that Spectacled Eiders nested almost as far east as the Canadian border and were patchily distributed from the Nushagak Peninsula near Dillingham north to the Arctic Coastal Plain. Current distribution on the Arctic Coastal Plain appears stable based on data from 1992-2006.	NLP
MAMMALS				
Wood Bison (ESA T , 10(j))	*Bison bison athabascae*	The foraging habitats most favored by wood bison are grass and sedge meadows occurring on alkaline soils. These meadows are typically interspersed among tracts of coniferous forest, stands of poplar or aspen, bogs, fens, and shrublands. Wet meadows are rarely used in the summer, probably because of the energy required to maneuver through the mud, but they are used in late summer when they become drier, and in the winter when they freeze (USFWS 2021a).	The core range of these wood bison, known as the Lower Yukon/Innoko Rivers Herd, was within 30 miles of Shageluk, except for two lone bison that have explored habitats along the Yukon River from Russian Mission to Galena (ADFG 2021).	PI
Northern Sea Otter (ESA T)	*Enhydra lutris kenyoni*	Because sea otters feed predominantly on benthic organisms, they are largely restricted to coastal waters. Within coastal habitats, otters forage along a variety of substrate types (e.g., sand, rock, mixed substrate, kelp forests) and wave exposure levels.	Ranges from Attu Island east to the Kodiak Archipelago and the Barrren Islands, and north to the Pribilof Islands. The northernmost extent is variable and dependent on sea ice extent.	NLP

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Polar Bear (ESA T)	*Ursus maritimus*	Sea ice habitat is essential for many aspects of polar bear ecology, including hunting, traveling, migration, resting, and denning. Den sites, which can also be built on land, are strongly tied to the presence of snow and are therefore often in areas that have some degree of topographical complexity and that tend to accumulate more snow than surrounding areas. Terrestrial habitats, such as barrier islands and coastal regions, are typically used in late summer and fall when sea ice is at its minimum. However, recent changes in sea ice have led to associated changes in polar bears' habitat use. Bears are spending less time in their preferred sea ice habitats and more time in suboptimal habitats, with implications to population dynamics. Several authors agree that increased use of terrestrial habitats is unlikely to compensate for the loss of sea ice habitat.	Sea ice habitat used by polar bears has decreased in recent decades because of climate change, and this decline is expected to continue. In some instances, polar bears have responded by increasing their use of terrestrial habitats, but at the population level, this strategy is unlikely to compensate for the loss of sea ice habitat.	PI
Pacific Walrus	*Odobenus rosmarus divergens*	Associated with sea ice and waters off the continental shelf. Foraging sites are typically associated with high prey biomass, such as the Hanna Shoal area. Sea ice is an important habitat requirement for walruses, which use ice habitat to bear offspring, molt, and haul out between foraging bouts. Walruses use terrestrial haul-outs when sea ice is absent, though use of terrestrial haul-out may be maladaptive. In recent years, walrus have responded by following the northward retreat of sea ice into the Chukchi Sea. Although their sea ice habitats are declining, walruses are not uncommon and they are somewhat adaptable in their habitat preferences more information is necessary.	In recent years, the distribution of Pacific walrus has moved north in response to changes in sea ice extent. However, by mid-century, models predict strong declines in sea ice extent in the Bering Sea and moderate declines in the Chukchi Sea and these declines are expected to lead to a contraction in its current distribution.	NLP
INVERTEBRATES				
Wilderness Small Minnow Mayfly	*Acentrella feropagus*	Like other mayflies, this species has a freshwater aquatic larval phase and avian adult phase (Randolph and McCafferty 2005).	Known from the Yukon River Watershed. (Randolph and McCafferty 2005).	PI

Common Name	*Genus species*	Habitat (from ACCS Conservation Status Assessments unless otherwise noted)	Range in Alaska (from ACCS Conservation Status Assessments unless otherwise noted)	Not Likely Present (NLP), Potentially Present – Potentially Impacted (PI)^
Alaska Sallfly	*Alaskaperla ovibovis*	Like other stoneflies, this species has a freshwater aquatic larval phase and avian adult phase.	Nymphs were collected from Moose Creek, at the Glenn Highway bridge west of Glennallen. Adults were also collected from the West Fork of the Dennison River, Hwy 5, 59 km N of Tetlin Junction and Spokane Creek, Hwy 1, 105 km S of Anchorage (Stewart and Dewalt 1991).	PI
Alaska Endemic Mayfly	*Rhithrogena ingalik*	Like other mayflies, this species has a freshwater aquatic larval phase and avian adult phase (Randolph and McCafferty 2005).	Known from Birch Creek, Yukon River Watershed. R. P. (Randolph and McCafferty 2005).	PI
Ashton Cuckoo Bumble Bee	*Bombus bohemicus*	Known Alaskan Floral Resources: *Melilotus, Rubus, Vaccinium*	Occurs in Central Interior, Matanuska Valley, Kenai, Kodiak, Yukon Kuskokwim Delta, and Juneau.	PI
Northern Yellow Bumble Bee	*Bombus distinguendus*	Unknown	Unknown	PI
Bumble Bee	*Bombus kluanensis*	Habitat: Tundra, alpine.	Currently only known from Denali National Park in Alaska but potentially present in similar habitats elsewhere.	PI
Confusing Bumble Bee	*Bombus perplexus*	Habitat: Forests, open parks and gardens known Alaskan floral associates: *Epilobium parviflorum, Melilotus albus, Trifolium repens, Vicia spp*	Limited distribution in Alaska to the Central and Eastern Interior. One occurrence in Matanuska Valley.	PI
Suckley's Cuckoo Bumble Bee	*Bombus suckleyi*	Recent reassessment shows that this species is no longer considered present in Alaska (Sikes and Rykken 2020).		NLP
FISH – see Water, Aquatic, and Riparian/Floodplain Resources section				
PLANTS – see Vegetative Resources section				

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APPENDIX C

Alaska National Interest Lands Conservation Act, Section 810 – Evaluation of Subsistence Impacts

1.0 Introduction

The Bureau of Land Management (BLM) has prepared an environmental assessment to assess the effects of opening up to 27.5 million acres of land to Alaska Native allotment selection. Section 1119 of the John D. Dingell, Jr. Conservation, Management, and Recreation Act of 2019 (Dingell Act) established the Alaska Native Vietnam-Era Veterans Land Allotment Program (Allotment Program). The Allotment Program provides eligible individuals with the opportunity to select an allotment of between 2.5 and 160 acres from available Federal lands in Alaska. Currently there are only 1.2 million acres of available Federal land from which an eligible individual can select an allotment which are geographically limited to three remote areas of Alaska. The BLM is proposing to open approximately 27.5 million additional acres of land to selection under the Allotment Program. This evaluation of subsistence impacts is for the Alaska Native Vietnam-era Veterans Land Allotment Environmental Assessment (EA). Lands under consideration for opening are located within the Bay, Bering Sea-Western Interior, East Alaska, Kobuk-Seward Peninsula, and Ring of Fire planning areas.

Section 810(a) of ANILCA, codified at 16 U.S.C. 3120(a), requires that an evaluation of subsistence uses and needs must be completed for any federal determination to "withdraw, reserve, lease, or otherwise permit the use, occupancy or disposition of public lands." Land being considered for opening to allotment selection involve BLM-administered lands, therefore, an evaluation of potential impacts on subsistence uses and needs under ANILCA Section 810(a) must be completed.

1.1 Proposed Action and Alternatives

In addition to a no action alternative (Alternative A), the EA considers two action alternatives (Alternatives B and C), which differ in the number of acres available for disposition under the Dingell Act (see Section 2 *Alternatives*). Under Alternative B, the BLM would open approximately 27.5 million acres of additional land, currently withdrawn under ANCSA Section 17(d)(1) within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas, to selections under the Alaska Native Vietnam-Era Veteran Allotment Program. Alternative C is the same as Alternative B, except it would not open lands identified as State "top filed" lands and certain lands that the Calista Native Corporation identified and requested the BLM not open to allotment selection under the Dingell Act. The land subject to selection under Alternative C is approximately 25 million acres.

The Alaska Native Vietnam-era Veterans Land Allotment EA describes the current condition of the planning area and potential effects of the alternatives on the physical, biological, and socioeconomic environment. Section **Error! Reference source not found.** of the EA addresses the affected environment and environmental effects for subsistence. This evaluation uses that information to address potential impacts to subsistence uses and needs pursuant to Section 810(a) of the Alaska National Interest Lands Conservation Act (ANILCA).

1.2 Subsistence Evaluation Factors

The Section 810 Compliance Process is effectuated by subsection 810(a). It consists of two levels of subsistence evaluations, referred to as Tier I and Tier II. Tier I, evaluations and findings, serve as the basis for Tier II, notice, hearings, and final determinations.

A Tier I evaluation is completed for all proposed land use actions for which it has been determined that compliance with ANILCA Section 810 is required. ANILCA requires that this evaluation include findings on three specific issues:

1. The effect of use, occupancy, or disposition on subsistence uses and needs
2. The availability of other lands for the purposes sought to be achieved
3. Other alternatives that would reduce or eliminate the use, occupancy, or disposition of public

lands needed for subsistence purposes.

Four factors are considered when determining if a significant restriction of subsistence uses and needs may result from the proposed action, alternatives, or cumulatively:

1. A reduction in the abundance of harvestable resources used for subsistence purposes.
2. A reduction in the availability of resources used for subsistence purposes caused by an alteration in their distribution, migration, or location.
3. A limitation on the access of subsistence users to harvestable resources.
4. An increase in competition from non-federally qualified users resulting in a disruption to the continuation of subsistence uses.

Section **Error! Reference source not found.** of the EA provides the background information on lands and resources important for subsistence uses for the five planning areas that contain lands under consideration for opening to allotment selection. Section **Error! Reference source not found.** and Section **Error! Reference source not found.** of the EA evaluates the effects of the alternatives on subsistence resource availability and access.

A finding that the proposed action may significantly restrict subsistence uses imposes requirements to notify the State of Alaska and appropriate regional and local subsistence committees, hold hearings in affected communities, and make the following determinations before BLM can authorize the use of public lands:

1. Such a significant restriction of subsistence uses is necessary and consistent with sound management principles for the use of the public lands.
2. The proposed activity would involve the minimal amount of public lands necessary to accomplish the purposes of the use, occupancy, or other disposition.
3. Reasonable steps would be taken to minimize adverse effects upon subsistence uses and resources resulting from such actions.

A proposed action or Alternative would be considered to significantly restrict subsistence uses if, after consideration of any project design features, mitigation measures, best management practices or stipulations, or other parameters, it can be expected to result in a "substantial reduction" in a community or group's opportunity to continue subsistence uses. This may be caused by a "large reduction" in the abundance of harvestable resources; a "major redistribution" of harvestable resources; a "substantial interference" with access; or "major increase" in non-rural resident hunting such that a community's opportunity to continue subsistence uses is disrupted.

1.3 Evaluation and Finding for Alternative A (No Action Alternative)

Existing conditions would continue under Alternative A. Lands would remain withdrawn under ANCSA 17(d)(1). There would be no impact to existing subsistence uses or needs. These lands would remain Federal public lands as described in ANILCA Section 102 and 50 CFR 100.3(d) and subject to Federal subsistence regulations.

1.3.1 Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Uses and Needs

Under Alternative A, there would be no reduction in the current availability of harvestable resource area that is used for subsistence, and existing conditions in the five planning areas as described in the EA would continue. BLM-administered lands, totaling approximately 30 million acres within the five planning areas, would continue to be subject to Federal subsistence regulations as described in 50 CFR 100. Since no lands would be conveyed to allotment holders, there would be no change in access to these

lands or to harvestable resources, and federally qualified subsistence users would be able to utilize and travel on these lands while engaged in subsistence hunting, trapping, and fishing. Additionally, there would not be any expected changes to existing harvest levels or reductions in resource abundance or availability, nor would there be any increase in competition from non-federally qualified users that don't already exist as described in the *Subsistence Uses and Resources, Affected Environment* section of this EA.

1.3.2 Evaluation of the Availability of Other Lands for the Purpose Sought to be Achieved

Under Alternative A, no additional lands will be opened to selection of allotments under the Alaska Native Veteran Allotment Program.

1.3.3 Evaluation of Other Alternatives that would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes

The proposed action alternatives are to occur on lands currently administered by BLM and subject to Federal subsistence regulations. For this Evaluation, the five BLM planning areas are the focus. Other Federal lands outside of the planning areas are not subject to the planning process, are outside the scope of the area being evaluated, and therefore would not be considered under this analysis.

Under Alternative A, there would be no change to the status of Federal lands available for subsistence. Hunting, gathering, and fishing were recognized as one of the primary expected uses of allotment lands by eligible individuals. However, under this Alternative, that primary use would not take place.

1.3.4 Findings

Under Alternative A, no additional lands would become available for conveyance of a Native allotment and the Federal Subsistence Board would retain authority to take management action on issues related to take, methods and means, and customary and traditional use determinations as allowed under 50 CFR 100. Because Alternative A would retain current Federal subsistence regulations, it would not result in a substantial reduction in a community or group's opportunity to continue subsistence uses.

1.4 Evaluation and Finding for Alternative B (Proposed Action)

Under the Proposed Action, approximately 27.5 million acres of ANCSA 17(d)(1) PLOs within the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas would be opened to selection of Native allotments by eligible individuals pursuant to Section 1119 of the Dingell Act. The BLM estimates that up to 3,000 eligible individuals may qualify for allotments under the program. The maximum number of acres that each allotment can be is 160 acres, which would translate into a maximum of 480,000 acres of Federal public lands currently under BLM management being conveyed, or approximately 1.7% of the 27.5 million acres open for selection under the Dingell Act if the public land orders in the five planning areas under consideration are amended.

1.4.1 Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Uses and Needs

If each eligible individual chose the maximum amount of acreage for their parcel, the conveyances of the Native allotments would result in a loss of 1.7% of Federal lands available for subsistence across the 27.5 million acres that would be made available under Alternative B. As described in the effects section of the *Subsistence Uses and Resources* section, even if all the land chosen for selection was only in one of the five planning areas, the maximum percentage of *BLM-administered acres* that would become ineligible for use by federally qualified subsistence users would be 58% in the Ring of Fire planning area. However, even here, there are a total of 39 million acres of Federal public lands in this region, resulting in a loss of only 1.2% of Federal public lands. It is unlikely that eligible individuals would only select land

in only one planning area. Therefore, the lands leaving Federal subsistence management will likely not have such a large impact on any one planning area.

Given the small percentage of land that would be taken out of use under Federal subsistence regulations, there should be a negligible reduction in access to harvestable resources by subsistence users under this alternative and it is unlikely that there would be any increase in competition from non-federally qualified users that would disrupt continuation of subsistence uses under this alternative. It should be noted that allotment owners would continue to be allowed to hunt, trap, and fish under Federal subsistence regulations on Federal lands adjacent to their allotments, as they would retain their rural priority off their private lands. Conveyance of allotments would likely not result in an influx of use by non-federally qualified users as the lands would be privately owned, although it could bring in some individuals that are not federally qualified subsistence users.

Marine mammals make up a large percentage of subsistence resources harvested in several of the affected planning areas. However, because the proposed action is to be limited to terrestrial disturbance, marine mammals are not expected to be affected. Furthermore, the minimal amount of acreage to be conveyed under this alternative should not impact either the abundance or availability of terrestrial subsistence resources because the size and distribution of allotments across the five planning areas are minimal compared to the total acres of Federal land that would still be available for subsistence.

1.4.2 Evaluation of the Availability of Other Lands for the Purpose Sought to be Achieved

The evaluation of Alternative B is identical to that provided for in Section 1.3.2 for Alternative A.

1.4.3 Evaluation of Other Alternatives that would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes

The proposed action/alternatives are to occur on lands currently administered by BLM and subject to Federal subsistence regulations. For this Evaluation, the five BLM planning areas are the focus. Other Federal lands outside of the planning areas are not subject to the planning process, are outside the scope of the area being evaluated, and therefore would not be considered under this analysis.

Under Alternative B, 27.5 million additional acres of BLM-administered lands would be available for allotment selection by eligible participants, which could be up to the maximum size of 160 acres. Subsistence has been recognized as one of the primary expected uses of lands by allotment holders and this Alternative would allow recipients to engage in subsistence activities on their own inholdings. However, it should be noted that allotment lands would be privately owned, and therefore, subject to State hunting, fishing, and trapping regulations. Federal subsistence regulations would not apply on these lands, though allotments would likely be located adjacent to Federal public lands and allotment owners could engage in Federal subsistence hunting, fishing, and trapping on these lands, assuming they were federally qualified subsistence users.

1.4.4 Findings

Alternative B would not result in a substantial reduction in a community or group's opportunity to continue subsistence uses. As stated in Section **Error! Reference source not found.** of the EA, the maximum amount of lands that could be conveyed to all eligible participants would be 480,000 acres, which comprises a very small percentage of the 27.5 million acres of BLM-administered lands across all five planning areas relevant to this EA. This percentage becomes even smaller when all other available Federal public lands in the five planning areas are considered, since they would be unaffected and retain the Federal subsistence priority and regulations. No substantial reduction in either the abundance or availability of subsistence resources would occur, nor would there be any substantial reduction in a community or groups ability to continue subsistence uses of these resources. Some reduction in access is possible, but the size of potential allotments relative to the total Federal acreage still available for subsistence is miniscule.

1.5 Evaluation and Finding for Alternative C

Alternative C is the same as Alternative B, except that the BLM would not open lands categorized as State "top filed" Priority 1 or Priority 2 and certain lands identified by the Calista Regional Corporation. The land subject to selection under this alternative is approximately 25.3 million acres.

1.5.1 Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Uses and Needs

Effects to subsistence uses and needs under this Alternative C would be substantially similar to those under the proposed action, except that the total acreage expected to be made unavailable to federally qualified subsistence users because of conveyance, relative to the total amount of acres subject to a Federal subsistence priority, would be even smaller. Approximately 3 million fewer acres would be available for selection under this alternative. Therefore, the already negligible impacts to the abundance, availability and access to subsistence resources would be reduced from those that could occur under the Proposed Action.

1.5.2 Evaluation of the Availability of Other Lands for the Purpose Sought to be Achieved

The evaluation of Alternative C is identical to that provided for in section 4.2 for Alternative A.

1.5.3 Evaluation of Other Alternatives that would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes

The evaluation of Alternative C is identical to that provided for in section 4.2 for Alternative B.

1.6 Evaluations and Findings for the Cumulative Case

Based on historical Native land allotment selections, the BLM expects that eligible individuals will focus on two categories of selections. First, lands that can be used for subsistence activities. Second, lands accessible by road. Most of the lands affected by this EA are in areas with little to no roads or other infrastructure. It can be reasonably expected that the primary use of allotments by eligible individuals will be for subsistence activities. Generally, activities on lands used for personal use and subsistence harvesting would be limited to clearing land, building a cabin, or developing a camping area. Allotments located adjacent to a road system or near an area with existing development would have a higher likelihood of increased development.

Allotments located within cities or villages are more likely to be subdivided and have multiple houses built on the allotments. In areas where sand or gravel materials are present, some allotments located near a city or village have also been developed for sand or gravel materials. Sand and gravel development is unlikely in remote locations due to lack of access or proximity to demand.

The applications that BLM has received to date are for lands along natural waterways or have other access but are otherwise remote and have a low likelihood of development. Areas with relative proximity to Anchorage/Wasilla include selections along the Denali Highway, Richardson Highway, Sterling Highway, the Old Glen Highway or towards lakes or rivers. However, most of these lands are in areas that have already been selected by the State or a Native Corporation, and these lands are unlikely to be relinquished.

1.6.1 Findings

The cumulative case is unlikely to result in a substantial restriction on subsistence. Most use of lands conveyed to eligible individuals can reasonably be expected to be used for subsistence. Most of the allotments would be in remote areas of the state with little to no roads or infrastructure. The maximum size of an allotment would be 160 acres and any development of such land can be expected to be limited

to clearing for cabin building or other small disturbances. Such activity, because it would be limited in size and scope, would not be expected to have an impact on subsistence resources or access to those resources by federally qualified subsistence users.

1.7 Notice and Hearing

ANILCA § 810(a) provides that no "withdrawal, reservation, lease, permit, or other use, occupancy or disposition of the public lands which would significantly restrict subsistence uses shall be effected" until the Federal agency gives the required notice and holds a hearing in accordance with ANILCA § 810(a)(1) and (2). Because the proposed action would not significantly restrict subsistence uses, no notice and hearing is required.

1.8 Subsistence Determinations Under the ANILCA Sections 810(A)(3)(A), (B), And (C)

ANILCA § 810(a) provides that no "withdrawal, reservation, lease, permit, or other use, occupancy or disposition of the public lands which would significantly restrict subsistence uses shall be effected" until the Federal agency gives the required notice and holds a hearing in accordance with ANILCA § 810(a)(1) and (2) and makes the three determinations required by ANILCA § 810(a)(3)(A), (B), and (C). The three determinations are (1) that such a significant restriction of subsistence use is necessary, consistent with sound management principles for the utilization of the public lands, (2) that the proposed activity will involve the minimal amount of public lands necessary to accomplish the purposes of such use, occupancy, or other such disposition, and (3) that reasonable steps will be taken to minimize adverse impacts to subsistence uses and resources resulting from such actions (16 U.S.C. 3120(a)(3)(A), (B), and (C)).

The BLM has determined in this subsistence evaluation that none of the alternatives would significantly restrict subsistence uses.