

## **APPENDIX B**

### **Glossary**



Term	Definition
17(d)(1) withdrawal	<p>A Public Land Order (PLO) made under the authority of Alaska Native Claims Settlement Act (ANCSA) 17(d)(1) by the Secretary of the Interior (Secretary) to classify or reclassify lands withdrawn and to open or close such lands to appropriation under the public land laws in accordance with the Secretary's classifications to ensure that the public interest in the lands is properly protected.</p> <p>17(d)(1) withdrawals are generally withdrawn from 1) all forms of appropriation under the public land laws and from 2) location and entry under the mining and mineral leasing laws. . Over the last 50 years, certain withdrawals have been revoked in part and reclassified for specific purposes, meaning that there are 17(d)(1) withdrawals that are not necessarily withdrawn from all forms of appropriation and from location and entry under the mining and mineral leasing laws.</p> <p>In this document, the term specifically applies to those lands withdrawn under this authority in the decision area.</p>
14(h)(1) lands	Lands containing Native historical places and cemetery sites for which regional Alaska Native corporations have submitted applications to obtain title to under ANCSA 14(h)(1).
100-year floodplain	The area inundated by the 100-year flood or the 1-percent-annual-exceedance-probability flood (the flood event that has 1 percent chance of being equaled or exceeded in any single year). The 100-year flood is often mistakenly thought of as the flood that occurs once every 100 years. In actuality, if one has a project located within the 100-year floodplain and the project life is expected to be 30 years, it will have a 25 percent chance of experiencing flood damage due to a 100-year flood. For example, for a project with an anticipated life of 15 years, the chance of incurring flood damage due to a 100-year flood would be 14 percent.
Adequate snow cover	Snow or frost of sufficient depth, generally 6 to 12 inches or more, or a combination of snow and frost depth, sufficient to protect the underlying vegetation and soil.
Alaska National Interest Lands Conservation Act (ANILCA)	A law passed in 1980 designating 104 million acres for conservation by establishing or expanding national parks, wildlife refuges, wild and scenic rivers, wilderness areas, forest monuments, conservation areas, recreation areas, and wilderness study areas to preserve them for future generations.
Alaska Native Claims Settlement Act (ANCSA)	A law passed by Congress in 1971 to settle aboriginal land claims in Alaska. Under the settlement, the Alaska Natives received title to a total of over 44 million acres, to be divided among some 220 Native villages and 12 regional corporations established by the act. The corporations also shared in a payment of \$962,500,000.
Anadromous	Fish that live most of their lives in the sea but return to fresh water to spawn. Anadromous streams are those that support fish species that migrate between freshwater and marine waters, such as salmon.
Anthropogenic	Anthropogenic effects, processes, objects, or materials are those that are derived from human activities, as opposed to those occurring in natural environments without human influences.
Appropriation	A devotion of land for a particular use or purpose.
Area of critical environmental concern	An area within the public lands where special management attention is required to protect important historic, cultural, or scenic values; to protect fish and wildlife or other natural systems or processes; or to protect life and safety from natural hazards.
Artifact	An object that was made, used, and/or transported by humans that provides information about human behavior in the past. Examples include pottery, stone tools, and bones with cut marks.
Bankfull stage	The depth of water in a stream at which incipient flooding occurs as the result of a streamflow that recurs on average every 1 to 2 years.
Conservation system unit	Any Alaska unit of the National Park System, National Wildlife Refuge System, National Wild and Scenic Rivers Systems, National Trails System, National Wilderness Preservation System, or a National Forest Monument.

Term	Definition
Continentality	A measure of the difference between continental and marine climates characterized by the increased range of temperatures that occurs over land compared with water. This generally means the farther you are away from an ocean or large body of water, the greater the seasonal temperature swing.
Conveyed	When the title to land was transferred from one party to another. The United States conveys title to land to Native corporations by patent and interim conveyance and to the State of Alaska by patent and tentative approval.
Cultural resources	Locations of human activity, occupation, or usage that contain materials, structures, or landscapes that were used, built, or modified by people. Cultural resources can include historic and archaeological sites, structures, and districts, traditional cultural places, and locations of sacred or ceremonial value.
Decision area	The 17(d)(1) withdrawals under consideration in this EIS, these are lands that were included in PLOs 7899 through 7903.
Encumbered lands	Lands that are not currently vacant, unappropriated, or unreserved and therefore unavailable for selection under 6(b) of the Alaska Statehood Act. Encumbrances include 17(d)(1) withdrawals, ANCSA selections, other agency withdrawals, Alaska Native veterans allotment selections under the Dingell Act, or mining claims.
Environmental justice	The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (BLM 2022).
Essential fish habitat	Those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. Essential Fish Habitat is defined by the Magnuson-Stevens Fishery Conservation and Management Act (Public Law 94-265).
Ethnographic Site	A site, structure, object, landscape, or natural resource feature assigned traditionally legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it.
Fluid minerals	Oil, gas, coal bed natural gas, and geothermal resources.
Geothermal energy	Natural heat from within the Earth, captured for production of electric power, space heating, or industrial steam.
Geomorphically stable	A stream channel that is in balance with the surrounding landscape, also known as being at dynamic equilibrium. This means that the streambed maintains dimension, pattern, and profile without aggrading or degrading over time, and lateral adjustments do not change the cross-sectional area of the stream, even after flood events. Geomorphically stable streams typically have a mix of pools and riffles, effectively transport and store wood and sediment, and have adequate vegetation to reduce erosion and dissipate stream energy.
High mineral potential	Areas where the potential for minerals is high and the certainty of that potential ranges from high to low. Minerals included are rare earth elements, placer gold, platinum group elements, copper, uranium, tin, and hard rock gold.
High-value watershed (HVW)	Watersheds that contain the highest fisheries and riparian resource values within a planning area. In these watersheds, riparian-dependent resources receive primary emphasis, and management activities are subject to specific required operating procedures. HVWs were developed using the BLM's Aquatic Resource Value (ARV) data, which were updated by the BLM in early 2018 (see Appendix L of the Bering Sea-Western Interior proposed resource management plan (RMP)/EIS for details on the ARV model). The ARV examined all watersheds (6th-level [12-digit] Hydrologic Unit Code [HUC6]) and watersheds specific to the Bering Sea-Western Interior and Central Yukon management plans and assessed different ecological attributes and assigned them scores for different categories of ARV and Watershed Condition Indicator. For the purpose of the Bering Sea-Western Interior RMP, ratings assigned specifically to the planning area were used to develop the HVWs.
Induced impacts	Induced impacts are the values stemming from household spending of income. Induced impacts are generated by the spending of the employees within the business' supply chain.
Land conveyance	In Alaska, <i>conveyance</i> generally means the transfer of Federal lands out of Federal ownership under ANCSA and/or the Alaska Statehood Act or the Native Allotment Act, to ANCSA Corporations, the State of Alaska, or individuals.

Term	Definition
Land disposal	A disposal is where the BLM sells land that is not encumbered by a selection application filed by ANCSA or the State of Alaska. Lands encumbered by the State of Alaska or ANCSA cannot be disposed of by the BLM but can be conveyed; see also land conveyance.
Leasable minerals	Minerals or materials designated as leasable under the Mineral Leasing Act of 1920. They include coal, phosphate, asphalt, potassium, sodium minerals, and oil and gas. Geothermal resources are also leasable under the Geothermal Steam Act of 1970. See also locatable minerals.
Locatable minerals	Minerals subject to exploration, development, and disposal by the staking of mining claims as authorized by the Mining Law of 1872, as amended. These include deposits of gold, silver, and other uncommon minerals not subject to lease or sale. Examples of locatable minerals include both metallic minerals (gold, silver, lead, copper, zinc, nickel, etc.) and nonmetallic minerals (fluorspar, mica, certain limestones and gypsum, tantalum, heavy minerals in placer form, and gemstones). See also leasable minerals.
Maintain	In terms of 17(d)(1) withdrawals, the existing withdrawals established under ANCSA 17(d)(1) would be maintained. That is, any lands currently withdrawn from the public land laws or from location and entry under the mining and mineral leasing laws under ANCSA 17(d)(1) would continue to be withdrawn.
Metalliferous	Metal-bearing; specifically pertaining to a mineral deposit from which a metal or metals can be extracted by metallurgical processes.
Mineral	Any naturally formed inorganic material, solid, or fluid inorganic substance that can be extracted from the earth. Any of various naturally occurring homogeneous substances (such as stone, coal, salt, sand, petroleum, water, or natural gas) obtained usually from the ground, under Federal laws considered as locatable (subject to the general mining laws), leasable (subject to the Mineral Leasing Act of 1920), and salable minerals (subject to the Materials Act of 1947).
Mineral entry	Lands that are open to mineral entry are open to the location of mining claims or sites under the Mining Law of 1872, as defined in 43 CFR 3830.5. Lands that are closed to mineral entry are not available for the location of mining claims or sites because the lands have been withdrawn or otherwise segregated from the operation of the Mining Law of 1872, as defined in 43 CFR 3830.5.
Mineral estate	The ownership of minerals, including rights necessary for access, exploration, development, mining, ore dressing, and transportation operations.
Mineral location	Mineral location is a mining claim filed pursuant to the General Mining Law of 1872.
Mining claim	A parcel of land that a miner takes and holds for mining purposes, having acquired the right of possession by complying with the Mining Law and local laws and rules. There are four categories of mining claims: lode, placer, millsite, and tunnel site.
Mining Law of 1872	Provides for claiming and gaining title to locatable minerals on public lands. Also referred to as the "General Mining Laws" or "Mining Laws."
Multiple use	Includes 1) the management of the various renewable surface resources so that they are used in the combination that will best meet the needs of the American people; 2) making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; 3) the understanding that some land will be used for less than all of the resources; and 4) the harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output (43 United States Code 1702(c)).
National Wild and Scenic River System	A system of nationally designated rivers and their immediate environments that have outstanding scenic, recreational, geologic, fish and wildlife, historic, cultural, and other similar values and are preserved in a free-flowing condition. The system consists of three types of streams: 1) recreational—rivers or sections of rivers that are readily accessible by road or railroad and that may have some development along their shorelines and may have undergone some impoundments or diversion in the past; 2) scenic—rivers or sections of rivers free of impoundments with shorelines or watersheds still largely undeveloped but accessible in places by roads; and 3) wild—rivers or sections of rivers free of impoundments and generally inaccessible except by trails, with watersheds or shorelines essentially primitive and waters unpolluted. See also wild and scenic river.

Term	Definition
Native allotment–selected	BLM-managed lands that have been selected as Native allotments under the Alaska Native Allotment Act of 1906; ANCSA; the Alaska Native Vietnam Veterans Act of 1998; and Section 1119 of the John D. Dingell, Jr. Conservation, Management, and Recreation Act, that have yet to be conveyed
Native selected	BLM-managed lands that have been selected by a Native corporation under the ANCSA and have yet to be conveyed. ANCSA gave Alaska Natives an entitlement of 44 million acres to be selected from a pool of public lands specifically defined and withdrawn by the act for that purpose.
Off-highway vehicle (OHV)	<p>OHV is synonymous with off-road vehicles (ORV). ORV is defined in 43 Code of Federal Regulations (CFR) 8340.0-5 as follows:</p> <p>(a) Off-road vehicle means any motorized vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain, excluding: (1) Any nonamphibious registered motorboat; (2) Any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes; (3) Any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved; (4) Vehicles in official use; (5) E-bikes, as defined in paragraph (j) of this section: (i) While being used on roads and trails upon which mechanized, non-motorized use is allowed; (ii) That are being used in a manner where the motor is not exclusively propelling the e-bike for an extended period of time; and (iii) Where the authorized officer has expressly determined, as part of a land-use planning or implementation-level decision, that e-bikes should be treated the same as non-motorized bicycles; and (6) Any combat or combat support vehicle when used in times of national defense emergencies.</p> <p>OHVs generally include dirt motorcycles, dune buggies, jeeps, four-wheel-drive vehicles, sport-utility vehicles, over-the-snow vehicles, Utility terrain vehicles, and all-terrain vehicles.</p>
Off-highway vehicle area designations	<p>Used by Federal agencies in the management of OHVs on public lands (43 CFR 8342.1). Refers to the land use planning decisions that permit, establish conditions, or prohibit OHV activities on specific areas of public lands. The CFR requires all BLM-managed lands to be designated as “open,” “limited,” or “closed to off-road vehicles” and provides guidelines for designation. The definitions of open, limited, and closed are provided in 43 CFR 8340.0-5 (f), (g), and (h), respectively.</p> <p>Closed: Motorized vehicle travel is prohibited in the area. Access by means other than motorized vehicle is permitted. Areas are designated closed if closure to all vehicular use is necessary to protect resources, promote visitor safety, or reduce use conflicts.</p> <p>Open: Motorized vehicle travel is permitted year-long anywhere within an area designated as “open” to OHV use. Open designations are used for intensive OHV use areas where there are no special restrictions or where there are no compelling resource protection needs, user conflicts, or public safety issues to warrant limiting cross-country travel.</p> <p>Limited: Motorized vehicle travel within specified areas and/or on designated routes, roads, vehicle ways, or trails is subject to restrictions. The “limited” designation is used where OHV use must be restricted to meet specific resource management objectives. Examples of limitations include number or type of vehicles; time or season of use; permitted or licensed use only; use limited to designated roads and trails; or other limitations if restrictions are necessary to meet resource management objectives, including certain competitive or intensive use areas that have special limitations.</p>
Permanent structure	A structure fixed to the ground by any of the various types of foundations, slabs, piers, poles, or other means allowed by building codes. The term also includes a structure placed on the ground that lacks foundations, slabs, piers, or poles and that can only be moved through disassembly into its component parts or by techniques commonly used in house moving (43 CFR 3715.0-5).
Primitive road	A linear route managed for use by four-wheel drive or high-clearance vehicles. Primitive roads do not normally meet any BLM road design standards.
Primitive route	Any transportation linear feature located within a wilderness study area or lands with wilderness characteristics prioritized for management by a land use plan and not meeting the wilderness inventory road definition.
Proper functioning condition	Riparian habitats are at proper functioning condition when adequate vegetation, land form, or large woody debris is present to 1) dissipate stream energy associated with high water flows, thereby reducing erosion and improving water quality; 2) filter sediment, capture bedload, and aid floodplain development; 3) improve floodwater retention and groundwater discharge; 4) develop root masses that stabilize streambanks against cutting action; 5) develop diverse ponding and channel characteristics to provide the habitat and water depth, duration, and temperature necessary for fish production, and other uses; and 6) support greater biodiversity.

Term	Definition
Public Land Order (PLO)	PLOs are issued by the Secretary of the Interior to implement, modify, extend, or revoke land withdrawals under the authority of the Federal Land Policy and Management Act of 1976 or other statutory authorities. Withdrawals of land remove land from the operation of all or some of the public land laws, including from location and entry under the mining laws, leasing under the mineral or geothermal leasing laws or mineral disposal under the mineral materials disposal laws.
Rare earth elements	A group of 16 chemical elements that occur together in the periodic table. The group consists of yttrium and the 15 lanthanide elements (lanthanum, cerium, praseodymium, neodymium, promethium, samarium, europium, gadolinium, terbium, dysprosium, holmium, erbium, thulium, ytterbium, and lutetium).
Reasonably foreseeable development scenario	The prediction of the type and amount of development activity that would occur in a given area. The prediction is based on availability of resource, history of extraction or production, projected demand for the resource, and industry interest.
Relinquish	In reference to land selection, when the selecting party voluntarily relinquishes their selection rights (generally under ANCSA or the Alaska Statehood Act)
Reject	In reference to land selections, when a BLM authorized official rejects an application for title on Federal lands, in the form of an appealable decision. A decision to reject an application can be made if an application is untimely filed, contains lands that are not available for selection, includes defects that are not curable, or the applicant does not furnish required documentation after it has been requested in writing.
Revoke	In terms of 17(d)(1) withdrawals, the existing withdrawals established under ANCSA 17(d)(1) would be revoked in part. I.e., lands currently withdrawn would be opened to public land laws, including selection under the Alaska Statehood Act and location and entry under the mining and mineral leasing laws. Revocation of withdrawals is effectuated by issuance of a PLO.
Riparian area	A form of transition between terrestrial and aquatic ecosystems. These areas are distinctly different from the surrounding lands because of unique soil and vegetation characteristics that are strongly influenced by free or unbound water in the soil. Riparian areas connect waterbodies with their adjacent uplands through surface and subsurface hydrology and are adjacent to perennial, intermittent, and ephemeral streams, lakes, and estuarine-marine shorelines (U.S. Department of Agriculture, Natural Resource Conservation Service 2010).
Riparian buffer	Variable-width buffer applied to each side of a river, stream, or other waterbody. Riparian buffers can protect water quality and ensure wildlife habitat suitability is maintained. In this resource management plan, riparian buffer distances on rivers and streams are used as proxies for the 100-year floodplain. See also 100-year floodplain.
Rights-of-way (ROWs)	Public lands authorized to be used or occupied for specific purposes pursuant to a ROW grant that are in the public interest and that require ROWs over, on, under, or through such lands.
ROW avoidance area	Areas where new ROWs should be placed in other areas if feasible. Determinations to allow a ROW within a ROW avoidance area would be made on a case-by-case basis by the authorized officer after project-specific NEPA has been completed.
ROW exclusion area	Areas where new ROWs are not allowed. A new ROW within a ROW exclusion area would require a plan amendment to approve.
Salable minerals	Minerals subject to the Materials Act of 1947, as amended. Salable minerals include materials such as sand and gravel.
Seasonal rounds	A representation of the timing of traditional activities, including the timing of subsistence resource harvests and other activities such as the processing and distribution (e.g., feasts) of wild foods. Rural communities generally have a well-established seasonal round based on when resources are present and accessible in their region, and the seasonal round is based on a longstanding relationship of rural residents with their environment.
Segregate	Set aside. In public land terms, where a parcel is segregated it is unavailable for other forms of appropriation.
Sensitive species	Those wildlife, fish, or plant species designated by the BLM Alaska State Director, usually in cooperation with the State agency responsible for managing the species, as sensitive. They are: 1) species under status review by the U.S. Fish and Wildlife Service and/or the National Marine Fisheries Service; 2) species whose numbers are declining so rapidly that Federal listing may be necessary; 3) species with typically small and widely dispersed populations; or 4) species inhabiting ecological refuges or other specialized or unique habitats.

Term	Definition
severity (wildfire)	The degree to which a site has been altered or disrupted by wildland fire; loosely, a product of fire intensity and residence time. In Alaska, fire severity refers to the amount of organic layer removed by a wildland fire event.
Special recreation management area	Areas where recreation and visitor services management is 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
Special Recreation Permit (SRP)	A means of authorizing recreational uses of public lands and waters. SRPs are issued for specific recreational uses as a means to manage visitor use, protect natural and cultural resources, and provide a mechanism to accommodate commercial recreational uses. There are four types of permits: commercial, competitive, organized groups/events vending, and individuals or groups in special areas.
Special status species	Special status species include the following: endangered species, threatened species, proposed species, candidate species, State-listed species, and BLM Alaska sensitive species.
State-selected	Formerly unappropriated and unreserved public lands that were selected by the State of Alaska as part of Section 6(b) of the Alaska Statehood Act of 1958 and Section 906 of ANILCA. Until conveyance, State-selected lands are managed by the federal agency with jurisdiction of the lands, including BLM, NPS, FWS, and the First Service. Section 906(f) of ANILCA allowed for overselection by the State by up to 25 percent of the entitlement. Therefore, some State-selected lands will eventually be retained in long-term Federal management.
Stipulations	To provide additional detail or criteria that could be applied to allowable uses or management actions. Examples include no surface occupancy, controlled surface use, and timing limitation. These stipulations apply to fluid mineral leasing and development of Federal mineral estate underlying BLM-managed lands, privately owned lands, and State-owned lands. Another example would include stipulations (or conditions) that could be required in ROW avoidance areas in order to consider those areas available for ROW.
Subsistence use	The customary and traditional uses by rural Alaska residents of wild, renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible by-products of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade. This includes any use of surface use transportation as a means of access to subsistence resources as provided for under ANILCA Section 811 and/or ANILCA Section 1110.
Successional stage	The replacement in time of one plant community with another. The prior plant community creates conditions that are favorable for the establishment of the next community.
Thermokarst	A land surface with karst-like features and hollows produced by melting of ice-rich soil or permafrost.
Top filings	ANILCA granted the State the ability to top file on lands not available for selection because the land was not vacant, unappropriated, or unreserved— if those lands subsequently become available, the State's top filing becomes an effective selection. Examples of lands top filed in Alaska include military reservations and the Trans-Alaska Pipeline System, which are withdrawn.
Traditional cultural property	A cultural resource type notable for its association with cultural practices or beliefs of a living community that a) are rooted in that community's history, and b) are important in maintaining the continuing cultural identity of the community.
Traditional use	This category of cultural resource use may be applied to any cultural property in a planning area known to be perceived by Alaska Natives as important in maintaining their cultural identity, heritage, or wellbeing.
Trail	A linear route managed for human-powered, stock, or OHV forms of transportation or for historical or heritage values. Trails are not generally managed for use by four-wheel drive or high-clearance vehicles.
Transportation linear disturbance	An existing user-made route that is not actively managed by the BLM. The decision regarding whether to retain or close this type of transportation linear feature would be made through implementation-level travel management planning.
Unencumbered	Public lands that have not been selected by the State of Alaska or ANCs or are not withdrawn.



Term	Definition
Visual resource management	A means of managing visual resources by designating areas as one of four classes: 1) Class I—maintaining a landscape setting that appears unaltered by humans, 2) Class II—designing proposed alterations so as to retain the existing character of the landscape, 3) Class III—designing proposed alterations so as to partially retain the existing character of the landscape, and 4) Class IV—providing for management activities which require major modifications of the existing character of the landscape.
Wetlands	<i>Freshwater wetlands</i> are defined as “environments characterized by rooted vegetation that is partially submerged either continuously or periodically by surface freshwater with less than 0.5 parts per thousand salt content and not exceeding three meters in depth.” <i>Saltwater wetlands</i> are defined as “coastal areas along sheltered shorelines characterized by halophilic hydrophytes and macro algae extending from extreme low tide to an area above extreme high tide that is influenced by sea spray or tidally induced water table changes.” This definition is comparable to the Clean Water Act Section 404 definition except that it goes beyond the Section 404 definition in regulating vegetated areas to a depth of 3 meters (Association of State Wetland Managers 2019).
Wild and scenic river	A river that is part of the National Wild and Scenic River System. In Alaska, most wild and scenic rivers were designated through ANILCA. See also National Wild and Scenic Rivers System.
Wildfire	An unplanned ignition of a wildland fire (such as a fire caused by lightning, volcanoes, or unauthorized and accidental human-caused fires) and escaped prescribed fires.
Wildland fire	General term describing any non-structure fire that occurs in the wildland. Wildland fires are categorized into two distinct types: 1) Wildfires—unplanned ignitions or prescribed fires that are declared wildfires; or 2) Prescribed fires—planned ignitions.
Withdrawal	Includes 1) Federal land set aside and dedicated to a present, governmental use; 2) public land set aside for some other public purpose (e.g., pending a determination of how the land is to be used); 3) an action approved by the Secretary of the Interior or a law enacted by Congress that closes land to specific uses under the public land laws (usually sale, settlement, location, and entry), or 4) limits on land use to maintain public values, reserves area for particular public use or program, or transfers jurisdiction of an area to another Federal agency. Usually established through a PLO or enacted by legislation.

## Literature Cited

- Association of State Wetland Managers. 2019. Alaska State Wetland Program Summary. Available at: [https://nawm.org/pdf\\_lib/state\\_summaries/alaska\\_state\\_wetland\\_program\\_summary\\_083115.pdf](https://nawm.org/pdf_lib/state_summaries/alaska_state_wetland_program_summary_083115.pdf). Accessed October 20123
- Bureau of Land Management (BLM). 2022. Addressing Environmental Justice in NEPA Documents: Frequently Asked Questions. BLM/WO/GI-17/010+1790. Washington, D.C.: U.S. Department of the Interior, Bureau of Land Management, Socioeconomics Program, Washington D.C.
- National Park Service. 1998. *NPS-28: Cultural Resource Management Guideline*. Effective Date: June 11, 1998.
- U.S. Department of Agriculture, Natural Resource Conservation Service. 2010. *Part 411 - Riparian Area Recognition and Management*. General Manual, Title 190 - Ecological Sciences. Available at: <https://directives.sc.egov.usda.gov/viewerFS.aspx?id=2640>. Accessed August 23, 2023.



## **APPENDIX C**

### **Alaska National Interest Lands Conservation Act Section 810 Evaluation**



## CONTENTS

<b>Introduction.....</b>	<b>1</b>
<b>Subsistence Evaluation Factors under Section 810(a) of ANILCA.....</b>	<b>2</b>
<b>Evaluations and Findings for All Alternatives and the Cumulative Case .....</b>	<b>3</b>
Evaluation and Findings for Alternative A (No Action Alternative) .....	7
Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need .....	7
Evaluation of the Availability of Other Lands.....	7
Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or	
Disposition of Public Lands Needed for Subsistence Purposes.....	7
Findings .....	7
Evaluation and Findings for Alternative B (Partial Revocation).....	8
Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need .....	8
Evaluation of the Availability of Other Lands.....	27
Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or	
Disposition of Public Lands Needed for Subsistence Purposes.....	27
Findings .....	28
Evaluation and Findings for Alternative C (Partial Revocation).....	32
Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need .....	32
Evaluation of the Availability of Other Lands.....	42
Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or	
Disposition of Public Lands Needed for Subsistence Purposes.....	43
Findings .....	43
Evaluation and Findings for Alternative D (2021 Proposed Action) .....	47
Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need .....	48
Evaluation of the Availability of Other Lands.....	58
Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or	
Disposition of Public Lands Needed for Subsistence Purposes.....	58
Findings .....	58
Evaluation and Findings for the Cumulative Case .....	62
Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need .....	63
Evaluation of the Availability of Other Lands.....	66
Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or	
Disposition of Public Lands Needed for Subsistence Purposes.....	66
Findings .....	66
<b>Notice and Hearings.....</b>	<b>73</b>
<b>Subsistence Determinations Under ANILCA Sections 810(a)(3)(A), (B), and (C).....</b>	<b>73</b>
<b>Literature Cited .....</b>	<b>74</b>

## Figures

Figure C-1. ANCSA 17(d)(1) subsistence analysis communities.....	5
--	---

## Tables

Table C-1. Percentage of Use Areas Overlapping 17(d)(1) Revocations More Likely to Be Developed or Losing Federal Subsistence Priority, Alternative B .....	10
Table C-2. Overall Community Impact Ranking, ANCSA 17(d)(1) Withdrawals Draft EIS, Alternative B .....	14
Table C-3. Summary of Findings, Alternative B .....	28
Table C-4. Percentage of Use Areas Overlapping 17(d)(1) Revocations More Likely to Be Developed or Losing Federal Subsistence Priority, Alternative C .....	34
Table C-5. Overall Community Impact Ranking, ANCSA 17(d)(1) Withdrawals Draft EIS, Alternative C .....	38
Table C-6. Summary of Findings, Alternative C .....	43
Table C-7. Percentage of Use Areas Overlapping 17(d)(1) Revocations More Likely to Be Developed or Losing Federal Subsistence Priority, Alternative D .....	49
Table C-8. Overall Community Impact Ranking, ANCSA 17(d)(1) Withdrawals Draft EIS, Alternative D .....	53
Table C-9. Summary of Findings, Alternative D .....	59
Table C-10. Summary of Findings .....	67

## **ABBREVIATIONS**

ACEC	areas of critical environmental concern
ANC	Alaska Native Corporation
ANCSA	Alaska Native Claims Settlement Act
ANILCA	Alaska National Interest Lands Conservation Act
BLM	Bureau of Land Management
EIS	environmental impact statement
DOI	U.S. Department of the Interior
GMU	Game Management Unit
PLO	Public Land Order
ROW	right-of-way
Secretary	Secretary of the Interior
SRB&A	Stephen R. Braund & Associates



*This page intentionally left blank.*

## INTRODUCTION

This evaluation of subsistence impacts has been prepared for the *ANCSA 17(d)(1) Withdrawals Draft Environmental Impact Statement* (EIS), which analyzes the environmental consequences of opening lands subject to Alaska Native Claims Settlement Act (ANCSA) 17(d)(1) withdrawals within Public Land Orders (PLOs) 7899 through 7903. These PLOs sought to revoke withdrawals on lands in the Kobuk-Seward Peninsula, Ring of Fire, Bay, Bering Sea-Western Interior, and East Alaska planning areas and were signed in 2021; only PLO 7899, which would revoke withdrawals on lands in the Kobuk-Seward Peninsula planning area, was published in the *Federal Register*, and the U.S. Department of the Interior (DOI) subsequently extended the opening order by 60 days to allow for additional review. The DOI identified procedural and legal defects in the decision-making process for PLOs 7899 through 7903, including insufficient analysis under the National Environmental Policy Act, failure to follow Section 106 of the National Historic Preservation Act, and failure to adequately analyze potential impacts on subsistence hunting and fishing. The draft EIS allows the DOI to address these identified deficiencies.

ANCSA 17(d)(1) withdrawals were originally withdrawn in 1972 and 1973 pursuant to passage of ANCSA in 1971. Sixteen PLOs withdrew the 17(d)(1) withdrawals from disposal or appropriation in order to maintain the status quo of the lands to “[e]nsure that the public interest in these lands is properly protected” and until Alaska Native Corporations (ANCs) could make their land selections. The ANCs have completed their land selections.

The resource management plans/EISs for each of the five planning areas covered in the ANCSA 17(d)(1) Withdrawals draft EIS recommended revocation of all 17(d)(1) withdrawals, and PLOs 7899 through 7903 would have implemented these recommendations. Full revocation of withdrawals would allow for the public land laws to be fully implemented, including the selection of Native allotments by Alaska Native veterans, the selection of lands pursuant to the Alaska Statehood Act (including allowing State top filed lands to become effective selections), and the opening of lands to mineral leasing and entry. Because PLOs 7899 through 7903 were put on hold for further review, the Secretary of the Interior (Secretary) has revoked the 17(d)(1) withdrawal in part for 27.8 million acres within the decision area to allow selections of Native allotments by Alaska Native veterans pursuant to the John D. Dingell Jr. Conservation, Management, and Recreation Act of 2019 (PLOs 7912 and 792).

The draft EIS provides a detailed analysis of the No Action Alternative and three action alternatives:

- Alternative A (No Action Alternative): Alternative A would retain the withdrawal of all lands currently subject to ANCSA 17(d)(1) withdrawals within the decision area, preserving the status quo without regard to PLOs 7899 through 7903.
- Alternative B (Partial Revocation): Alternative B would revoke in part withdrawals to allow State of Alaska Priority 1 and 2 top filed lands to convert to Alaska Statehood Act selections where conflicts with natural resources, cultural resources, subsistence resources, recreational resources, or proposed or existing areas of critical environmental concern (ACECs) would be minimized. All other lands would remain withdrawn.
- Alternative C (Partial Revocation): Alternative C would revoke in full the withdrawals for 17(d)(1) withdrawals that have high mineral potential and revoke in part all State of Alaska Priority 1 and 2 top filed lands that are not on high mineral potential lands. All other lands would remain withdrawn.
- Alternative D (2021 Proposed Action): Alternative D would revoke all ANCSA 17(d)(1) withdrawals consistent with PLOs 7899 through 7903.

## **SUBSISTENCE EVALUATION FACTORS UNDER SECTION 810(A) OF ANILCA**

Section 810(a) of the Alaska National Interest Lands Conservation Act (ANILCA), 16 United States Code 3120(a), requires that an evaluation of subsistence uses and needs be completed for any Federal determination to “withdraw, reserve, lease, or otherwise permit the use, occupancy, or disposition of public lands.” Revoking the 17(d)(1) withdrawals would open the lands to the application of the public land laws and can lead to the non-discretionary disposition of public lands. Given this, an evaluation of potential impacts on subsistence under ANILCA 810(a) must be completed for the ANCSA 17(d)(1) Withdrawals draft EIS. ANILCA requires that this evaluation include findings on three specific issues, as follows:

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

Three criteria are considered when determining if a significant restriction of subsistence uses and needs may result from the proposed action, alternatives, or in the cumulative case, as follows:

- Reduction in the abundance of harvestable resources used for subsistence purposes
- Reduction in the availability of resources used for subsistence caused by alteration of their distribution, migration patterns, or location
- Limitations on access to subsistence resources, including from increased competition for the resources

Each alternative must be analyzed according to these criteria. ANILCA 810 also requires that cumulative impacts be analyzed. This approach helps the reader understand how the subsistence restrictions that could be caused by activities proposed under the four alternatives, including the No Action Alternative, add to those that could be caused by past, present, or future activities that have occurred or could occur in the surrounding area.

An alternative would be considered to significantly restrict subsistence uses if, after consideration of protection measures such as lease stipulations or required operating procedures, it can be expected to substantially reduce the opportunity to use subsistence resources. Substantial reductions are generally caused by large reductions in resource abundance, a major redistribution of resources, extensive interference with access, or major increases in the use of those resources by non-subsistence users.

If the analysis determines that the proposed action, alternatives, or the cumulative impacts may significantly restrict subsistence uses, the head of the Federal agency having jurisdiction over the Federal public lands in question is required to notify the State of Alaska and appropriate regional and local subsistence committees. It also must conduct ANILCA 810 hearings in the vicinity of potentially affected communities.

It is possible that the finding may be revised to “will not significantly restrict subsistence uses” based on changes to alternatives, new information, or new mitigation measures resulting from the hearings. If the significant restriction remains, the head of the Federal agency having jurisdiction may prohibit the action or approve the action after making the following determinations:

- Such a significant restriction of subsistence uses is necessary, consistent with sound management principles for the use of the public lands. The proposed activity would involve the minimal

amount of public land necessary to accomplish the purpose of the use, occupancy, or other disposition

- Reasonable steps would be taken to minimize adverse effects on subsistence uses and resources resulting from such actions (ANILCA 810(a)(3))

The head of the Federal agency having jurisdiction can then authorize use of the public lands.

## **EVALUATIONS AND FINDINGS FOR ALL ALTERNATIVES AND THE CUMULATIVE CASE**

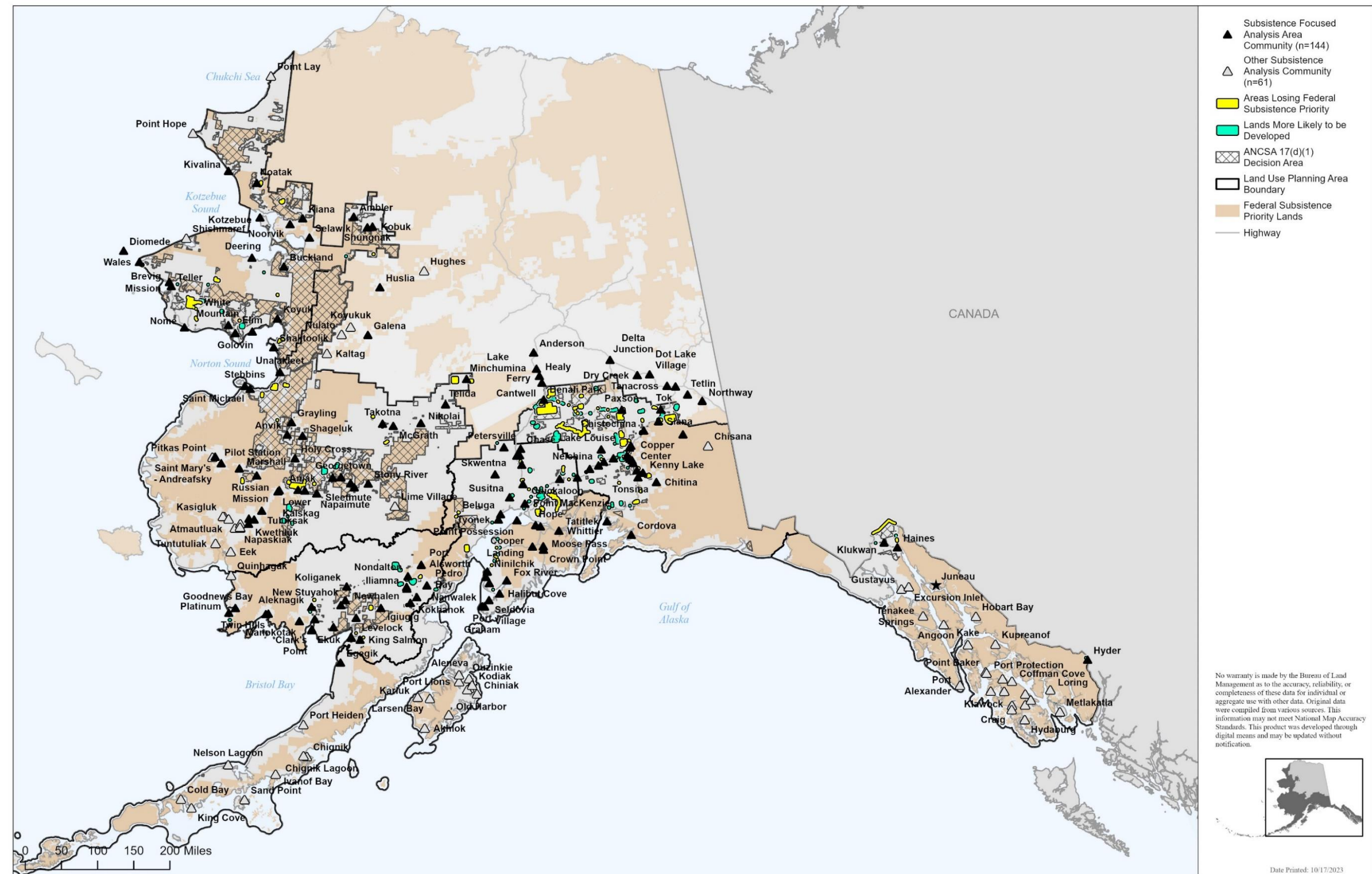
Chapter 2 of the draft EIS includes a description of the four alternatives (including the No Action Alternative), including acres of 17(d)(1) withdrawals retained and revoked by land status (e.g., State top filed, State priority, high mineral potential lands). It also includes a description of the reasonably foreseeable development scenario and land selection assumptions.

Chapter 3 of the draft EIS, Affected Environment and Environmental Consequences, describes the current environmental status of the decision area and the potential effects of the alternative scenarios to the physical, biological, and social environment if the action is taken. In particular, draft EIS Section 3.14, Subsistence, addresses the affected environment and environmental consequences for subsistence under three key issues: subsistence user access, subsistence resource abundance, and subsistence resource availability. That section is organized to inform the Bureau of Land Management's (BLM's) findings of significance based on the factors previously listed (Subsistence Evaluation Factors under ANILCA 810(a)). Other relevant sections include draft EIS Section 3.15, Terrestrial Mammals, draft EIS Section 3.7, Fish and Aquatic Species, and draft EIS Section 3.2, Birds and Special Status Bird Species. This analysis uses the information in the draft EIS to evaluate potential impacts to subsistence uses and needs pursuant to ANILCA 810(a).

In the Affected Environment sections under each subsistence issue statement, the draft EIS provides baseline subsistence data for all 223 rural communities located within 50 miles of the 17(d)(1) withdrawals (Figure C-1). The Environmental Consequences sections focus the analysis on a subset of 139 subsistence analysis communities that would be most likely to be affected by revocation of withdrawals. As indicated in Sections 3.14.1.2, 3.14.2.2, and 3.14.3.2 of the draft EIS (Environmental Consequences), revocation of 17(d)(1) withdrawals would affect user access, resource abundance, and resource availability in two primary ways. First, the revocation would allow State top filings to become effective State selections. These lands would no longer be considered public lands per ANILCA and rural residents would lose Federal subsistence priority on these lands permanently if conveyed or temporarily while the land is effectively selected by the State. If the lands are conveyed, the lands would also no longer be Federally managed to guarantee continued subsistence access or to mitigate the effects on subsistence from development on the adjacent lands subject to Federal subsistence priority. Second, the revocation would open lands to the General Mining Law and mineral leasing, which can lead to development on the Federal lands. The effects of the revocation of 17(d)(1) withdrawals are expected to be greatest where the lands are both more likely to be developed and likely conveyed out of Federal ownership.

Thus, the focused analysis area for subsistence consists of lands more likely to be developed or where there would be a loss of Federal subsistence priority upon revocation of withdrawals. These are the parcels where subsistence users may experience impacts related to development or loss of Federal subsistence priority. There are 139 analysis communities within 50 miles of, or with subsistence use areas overlapping, the subsistence focused analysis area. This Section 810 analysis considers impacts to the 139 focused analysis area communities because these are the communities likely to experience an impact resulting from revocation of 17(d)(1) withdrawals.

*This page intentionally left blank.*



**Figure C-1. ANCSA 17(d)(1) subsistence analysis communities.**

*This page intentionally left blank.*

Under each alternative, impacts are considered for communities in terms of their proximity to the focused analysis area, specifically lands where there would be a loss of Federal subsistence priority upon revocation of withdrawals, and lands more likely to be developed once conveyed.

## **Evaluation and Findings for Alternative A (No Action Alternative)**

Under Alternative A, the BLM would retain all 17(d)(1) withdrawals throughout the five planning areas. Retaining withdrawals would preserve the status quo without regard to PLOs 7899 through 7903.

### ***Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need***

Under Alternative A, all 17(d)(1) withdrawals would be retained, and there would be no change from baseline conditions. Selected or top filed parcels would remain so under Alternative A, and therefore subsistence management on these lands would not change. In the Bay and Ring of Fire planning areas, all 17(d)(1) withdrawals would remain closed to mineral entry, whereas in other planning areas, a portion of retained lands would remain open to mineral entry. The Kobuk-Seward Peninsula planning area would have the greatest amount of land open to mineral entry under the No Action Alternative, and therefore this planning area is most likely to experience ongoing impacts to user access, resource abundance, and resource availability resulting from development infrastructure, activities, and restrictions (see draft EIS Section 3.4.1.2.2, Increased Lands Open to Development). Under the No Action Alternative, there would be a continuation of existing conditions, including ongoing impacts to user access through subsistence management, development activities and infrastructure, security policies, and climate change.

### ***Evaluation of the Availability of Other Lands***

The evaluation for Alternative A regarding the availability of other lands is not applicable because Alternative A does not propose further disposition or use of public lands beyond the status quo.

### ***Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes***

Under Alternative A, revocation of 17(d)(1) withdrawals would not occur. Therefore, there is no need to evaluate other ways to implement the proposed action. Draft EIS Section 2.6 discusses other alternatives that were considered but eliminated from the analysis and the justifications for elimination of these alternatives.

## ***Findings***

Under Alternative A, the BLM would retain all 17(d)(1) withdrawals in the five planning areas. Retaining withdrawals would preserve the status quo without regard to PLOs 7899 through 7903. Top filed parcels would not become effective selections under Alternative A, and therefore subsistence management on these lands would not change. Under Alternative A, there would be a continuation of existing conditions, including ongoing impacts to user access through subsistence management, development activities and infrastructure, security policies, and climate change.



This evaluation concludes that Alternative A would not result in a significant reduction in subsistence uses and would not significantly restrict subsistence uses and needs compared to current conditions. This finding applies to all 223 subsistence analysis communities evaluated in the draft EIS.

## **Evaluation and Findings for Alternative B (Partial Revocation)**

Alternative B would revoke 17(d)(1) withdrawals in part to allow Alaska Statehood Act selections on State of Alaska Priority 1 and 2 top filed lands where conflicts with natural resources, cultural resources, subsistence resources, recreational resources, or proposed or existing ACECs would be minimized. Federal subsistence priority would no longer apply to approximately 44,000 acres of land that become effective selections upon revocation and will likely be conveyed within 10 years of the Secretary's decision. All other lands would remain withdrawn under Alternative B.

Because Alternative B would not revoke withdrawals on State top filed lands that have more than minor conflicts with subsistence, direct impacts to subsistence would be lessened compared to the other alternatives; however, it is likely that subsistence activities do occur on lands where withdrawals would be revoked, and therefore impacts would be lessened but not removed. Primary impacts on subsistence user access, resource abundance, and resource availability would result from a change in subsistence management (i.e., loss of Federal subsistence priority) or an increase in the potential for development. How these may affect subsistence are discussed below.

### ***Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need***

Under Alternative B, 433,000 acres of current 17(d)(1) withdrawals would be revoked in part, allowing State top filings to fall into place and become selections on lands where there are no other encumbrances. It is assumed that State Priority 1 and 2 lands that do fall into place would be conveyed to the State within 10 years of the record of decision. Under Alternative B, State of Alaska Priority 1 and 2 top filed lands would convert to selections in parcels where conflicts with natural resources, cultural resources, subsistence resources, recreational resources, or proposed or existing ACECs would be minimized.

To varying levels, a loss of Federal subsistence priority and an increase in development activity or infrastructure associated with revocation of withdrawals and changes from Federal to State management could affect subsistence user access, subsistence resource abundance, and subsistence resource availability. As discussed above, these impacts would be most likely to occur for communities near or with uses of lands in the focused analysis area, which captures lands where there would be a loss of Federal subsistence priority or where there is a higher potential for development.

Under Alternative B, 65 of the 139 focused analysis area communities have subsistence use areas that overlap with 17(d)(1) withdrawals that would lose Federal subsistence priority (Table C-1). These communities may experience changes in subsistence user access, resource abundance, and resource availability as a result of revocation of withdrawals and loss of Federal subsistence priority. Primary impacts would be to user access and resource availability, with the potential for indirect impacts to resource abundance. The East Alaska planning area has the most communities with a potential loss of Federal subsistence priority on certain lands (28 communities), followed by the Ring of Fire (19 communities), Kobuk-Seward Peninsula (8 communities), Bay (8 communities), and Bering Sea-Western Interior (2 communities) planning areas. The communities with the greatest acreage of use areas where there would be a loss of Federal subsistence priority (more than 4,000 acres) are in the East Alaska, Ring of Fire, and Kobuk-Seward Peninsula planning areas and include Copper Center, Glennallen, Cantwell,

Trapper Creek, Kotzebue, Healy, Ambler, Kiana, and Noorvik (see Table C-1). Under Alternative B, 10 communities would lose Federal subsistence priority in some areas adjacent to (i.e., within 5 miles of) their community (see draft EIS Table 3.14-6). These communities include Glennallen, Gulkana, Slana, Kenny Lake, and Tazlina in the East Alaska planning area; Susitna North and Willow in the Ring of Fire planning area; King Salmon in the Bay planning area; Lake Minchumina in the Bering Sea-Western Interior planning area; and Wales in the Kobuk-Seward Peninsula planning area. In addition, 32 communities would lose Federal subsistence priority in some lands central to their subsistence use areas (i.e., within 25 miles of the community), primarily in the East Alaska and Ring of Fire planning areas (see draft EIS Table 3.14-6). These communities are the most likely to experience impacts from a loss of Federal subsistence priority under Alternative B.

Also under Alternative B, 56 of the 139 focused analysis communities have subsistence use areas overlapping lands more likely to be developed (see Table C-1). These communities may also experience impacts to subsistence user access, resource abundance, and resource availability as a result of revocation of withdrawals and an increase in development activity and infrastructure in those areas. The East Alaska planning area has the most communities with subsistence uses on 17(d)(1) revocations likely to be developed (29 communities), followed by the Ring of Fire (19 communities) and Bay (7 communities) planning areas.

Nine individual communities have more than 20,000 acres of 17(d)(1) revocations with lands more likely to be developed under Alternative B (Table C-1). Under Alternative B, some 17(d)(1) revocations more likely to be developed are adjacent to (i.e., within 5 miles of) ten communities, comprising Glennallen, Gulkana, Slana, Cantwell, Chistochina, and Mentasta Lake in the East Alaska planning area; Susitna North and Willow in the Ring of Fire planning area; King Salmon in the Bay planning area; and Wales in the Kobuk-Seward Peninsula planning area (see draft EIS Table 3.14-6). Some 17(d)(1) revocations more likely to be developed are central to (i.e., within 25 miles) 42 communities, primarily in the East Alaska (15 communities), followed by the Ring of Fire (13 communities), Kobuk-Seward Peninsula (8 communities), Bay (5 communities), and Bering Sea-Western Interior (1 community) planning areas. These communities are the most likely to experience impacts from an increase in development activities and infrastructure under Alternative B.

Table C-2 provides an overall impact ranking for each analysis community based on the quantity of use area acres overlapping lands losing Federal subsistence priority and lands more likely to be developed and based on the distance of these lands from each community. For quantity of use area acres overlapping revoked lands, the table applies a ranking of 0 to 3 as follows: 0 (no overlap with use areas), 1 (< 1,000 acres), 2 (between 1,000 and 10,000 acres; or, if no use area data, assumed “yes” based on 50-mile radius from community), and 3 (> 10,000 acres). For the distance analysis, the table applies a ranking of 0 to 3 as follows: 0 (no overlap with use areas), 1 (community > 25 miles from revocations), 2 (community between 5 and 25 miles from revocations), and 3 (community within 5 miles of revocations). Both the acreage and distance rankings are applied to each community for 1) revoked lands likely to be developed and 2) revoked lands where there would be a loss of Federal subsistence priority. The individual rankings are then summed to provide a final impact ranking of between 0 and 12 (the maximum ranking possible). This provides a measure of the relative impact to individual communities across the five planning areas.

Communities in the East Alaska and Ring of Fire planning areas have the highest impact rankings and include the communities of Glennallen, Gulkana, Slana, Cantwell, Chistochina, Copper Center, and Mentasta Lake in East Alaska and Susitna North and Willow in the Ring of Fire planning area (see Table C-2). In the other planning areas, communities with the highest impact rankings include King Salmon, Naknek, and South Naknek in the Bay planning area; Takotna, McGrath, and Lake Minchumina in the Bering Sea-Western Interior planning area; and Wales in the Kobuk-Seward Peninsula planning area.

Potential impacts to user access, resource abundance, and resource availability for potentially affected communities resulting from revocation of withdrawals and a subsequent change to subsistence management or increase in development are discussed in the following sections.

**Table C-1. Percentage of Use Areas Overlapping 17(d)(1) Revocations More Likely to Be Developed or Losing Federal Subsistence Priority, Alternative B**

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Ambler	Kobuk-Seward Peninsula	4,736	0.01%	0	0.00%
Brevig Mission	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Buckland	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Deering	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Diomedede	Kobuk-Seward Peninsula	0	0.00%	N/A	N/A
Elim	Kobuk-Seward Peninsula	No	No	No	No
Golovin	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Kiana	Kobuk-Seward Peninsula	4,736	0.03%	0	0.00%
Kivalina	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Kobuk	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Kotzebue	Kobuk-Seward Peninsula	4,755	0.04%	0	0.00%
Koyuk	Kobuk-Seward Peninsula	No	No	No	No
Noatak	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Nome	Kobuk-Seward Peninsula	45	0.00%	0	0.00%
Noorvik	Kobuk-Seward Peninsula	4,736	0.03%	0	0.00%
Selawik	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Shaktolik	Kobuk-Seward Peninsula	No	No	No	No
Shungnak	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Teller	Kobuk-Seward Peninsula	Yes	Yes	No	No
Wales	Kobuk-Seward Peninsula	647	0.11%	N/A	N/A
White Mountain	Kobuk-Seward Peninsula	Yes	Yes	No	No
Akiachak	Bering Sea-Western Interior	0	0.00%	0	0.00%
Akiak	Bering Sea-Western Interior	N/A	N/A	No	No
Aniak	Bering Sea-Western Interior	0	0.00%	0	0.00%
Anvik	Bering Sea-Western Interior	No	No	N/A	N/A
Chuathbaluk	Bering Sea-Western Interior	No	No	N/A	N/A
Crooked Creek	Bering Sea-Western Interior	No	No	No	No
Galena	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Georgetown	Bering Sea-Western Interior	No	No	No	No
Grayling	Bering Sea-Western Interior	No	No	N/A	N/A
Holy Cross	Bering Sea-Western Interior	No	No	N/A	N/A

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Huslia	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Lake Minchumina	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Lower Kalskag	Bering Sea-Western Interior	No	No	N/A	N/A
Marshall	Bering Sea-Western Interior	0	0.00%	N/A	N/A
McGrath	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Napaimute	Bering Sea-Western Interior	No	No	No	No
Nikolai	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Pilot Station	Bering Sea-Western Interior	No	No	N/A	N/A
Red Devil	Bering Sea-Western Interior	No	No	No	No
Russian Mission	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Saint Mary's	Bering Sea-Western Interior	No	No	N/A	N/A
Saint Michael	Bering Sea-Western Interior	No	No	N/A	N/A
Shageluk	Bering Sea-Western Interior	No	No	N/A	N/A
Sleetmute	Bering Sea-Western Interior	N/A	N/A	No	No
Stebbins	Bering Sea-Western Interior	No	No	N/A	N/A
Stony River	Bering Sea-Western Interior	N/A	N/A	No	No
Takotna	Bering Sea-Western Interior	Yes	Yes	No	No
Telida	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Tuluksak	Bering Sea-Western Interior	0	0.00%	0	0.00%
Unalakleet	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Upper Kalskag	Bering Sea-Western Interior	No	No	N/A	N/A
Aleknagik	Bay	0	0.00%	0	0.00%
Clark's Point	Bay	3	0.00%	0	0.00%
Dillingham	Bay	1	0.00%	0	0.00%
Ekuk	Bay	No	No	No	No
Ekwok	Bay	20	0.00%	0	0.00%
Igiugig	Bay	0	0.00%	N/A	N/A
Iliamna	Bay	15	0.00%	1	0.00%
King Salmon	Bay	23	0.00%	0	0.00%
Kokhanok	Bay	0	0.00%	72	0.00%
Koliganek	Bay	0	0.00%	N/A	N/A
Levelock	Bay	4	0.00%	0	0.00%
Manokotak	Bay	0	0.00%	0	0.00%
Naknek	Bay	23	0.00%	0	0.00%
New Stuyahok	Bay	0	0.00%	0	0.00%
Newhalen	Bay	0	0.00%	1	0.00%

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Nondalton	Bay	0	0.00%	1	0.00%
Pedro Bay	Bay	0	0.00%	72	0.01%
Platinum	Bay	0	0.00%	0	0.00%
Pope-Vannoy Landing	Bay	No	No	Yes	Yes
Port Alsworth	Bay	0	0.00%	1	0.00%
Portage Creek	Bay	0	0.00%	0	0.00%
South Naknek	Bay	23	0.00%	0	0.00%
Togiak	Bay	0	0.00%	0	0.00%
Twin Hills	Bay	0	0.00%	0	0.00%
Beluga	Ring of Fire	0	0.00%	0	0.00%
Chase	Ring of Fire	174	0.01%	329	0.01%
Chickaloon	Ring of Fire	9	0.00%	0	0.00%
Cooper Landing	Ring of Fire	42	0.00%	568	0.01%
Crown Point	Ring of Fire	Yes	Yes	N/A	N/A
Egegik	Ring of Fire	0	0.00%	0	0.00%
Fox River	Ring of Fire	Yes	Yes	Yes	Yes
Haines	Ring of Fire	0	0.00%	N/A	N/A
Halibut Cove	Ring of Fire	Yes	Yes	Yes	Yes
Happy Valley	Ring of Fire	Yes	Yes	Yes	Yes
Hope	Ring of Fire	0	0.00%	82	0.01%
Klukwan	Ring of Fire	0	0.00%	N/A	N/A
Moose Pass	Ring of Fire	Yes	Yes	N/A	N/A
Nanwalek	Ring of Fire	0	0.00%	261	0.01%
Nikolaevsk	Ring of Fire	0	0.00%	5	0.00%
Ninilchik	Ring of Fire	1	0.00%	147	0.00%
Petersville	Ring of Fire	Yes	Yes	Yes	Yes
Point MacKenzie	Ring of Fire	Yes	Yes	Yes	Yes
Point Possession	Ring of Fire	Yes	Yes	Yes	Yes
Seldovia	Ring of Fire	38	0.00%	349	0.01%
Skwentna	Ring of Fire	0	0.00%	0	0.00%
Sunrise	Ring of Fire	Yes	Yes	Yes	Yes
Susitna	Ring of Fire	0	0.00%	0	0.00%
Susitna North	Ring of Fire	Yes	Yes	Yes	Yes
Talkeetna	Ring of Fire	1,114	0.01%	2,162	0.02%
Trapper Creek	Ring of Fire	4,841	0.08%	1,458	0.03%
Tyonek	Ring of Fire	0	0.00%	0	0.00%

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Whittier	Ring of Fire	183	0.00%	2,418	0.04%
Willow	Ring of Fire	Yes	Yes	Yes	Yes
Anderson	East Alaska	2,222	0.02%	1,370	0.01%
Cantwell	East Alaska	4,849	0.11%	1,365	0.03%
Chistochina	East Alaska	92	0.01%	10,811	0.65%
Chitina	East Alaska	32	0.00%	5,451	0.37%
Copper Center	East Alaska	5,542	0.10%	33,212	0.59%
Cordova	East Alaska	Yes	Yes	No	No
Denali Park	East Alaska	2,344	0.06%	1,351	0.03%
Dot Lake	East Alaska	27	0.00%	614	0.11%
Dry Creek	East Alaska	0	0.00%	N/A	N/A
Eureka Roadhouse	East Alaska	Yes	Yes	Yes	Yes
Ferry	East Alaska	2,962	0.21%	51	0.00%
Gakona	East Alaska	44	0.00%	11,718	0.31%
Glacier View	East Alaska	9	0.00%	5	0.00%
Glennallen	East Alaska	5,534	0.11%	32,095	0.63%
Gulkana	East Alaska	1,770	0.08%	25,239	1.19%
Healy	East Alaska	4,747	0.05%	1,247	0.01%
Kenny Lake	East Alaska	80	0.00%	12,125	0.44%
Lake Louise	East Alaska	0	0.00%	2,954	0.26%
Mendeltna	East Alaska	1,744	0.03%	22,191	0.44%
Mentasta Lake	East Alaska	143	0.00%	21,157	0.23%
Nabesna	East Alaska	92	0.00%	7,045	0.31%
Nelchina	East Alaska	1,744	0.03%	22,191	0.43%
Northway	East Alaska	27	0.00%	3,195	0.13%
Paxson	East Alaska	5	0.00%	2,875	0.14%
Silver Springs	East Alaska	Yes	Yes	Yes	Yes
Slana	East Alaska	27	0.00%	13,069	0.65%
Tanacross	East Alaska	27	0.00%	12,003	0.47%
Tatitlek	East Alaska	0	0.00%	0	0.00%
Tazlina	East Alaska	67	0.00%	5,701	0.18%
Tetlin	East Alaska	0	0.00%	0	0.00%
Tok	East Alaska	143	0.00%	16,972	0.17%
Tolsona	East Alaska	0	0.00%	1,052	0.06%

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Tonsina	East Alaska	1,752	0.04%	28,920	0.68%
Willow Creek	East Alaska	0	0.00%	0	0.00%

Notes: Communities with yes/no entries do not have available subsistence use areas data. Presence/absence of overlap is based on an assumed 50-mile radius of subsistence use around the community.

N/A = Community not within 50 miles/use area not overlapping analysis area.

\* Areas losing Federal subsistence use priority as a result of the decision from the draft EIS are State top filings that are not otherwise encumbered that would immediately become effective selections.

**Table C-2. Overall Community Impact Ranking, ANCSA 17(d)(1) Withdrawals Draft EIS, Alternative B**

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Glennallen	East Alaska	Adjacent	5,534	Adjacent	32,095	11
Gulkana	East Alaska	Adjacent	1,770	Adjacent	25,239	11
Slana	East Alaska	Adjacent	27	Adjacent	13,069	10
Susitna North	Ring of Fire	Adjacent	Yes	Adjacent	Yes	10
Willow	Ring of Fire	Adjacent	Yes	Adjacent	Yes	10
Cantwell	East Alaska	Central	4,849	Adjacent	1,365	9
Chistochina	East Alaska	Central	92	Adjacent	10,811	9
Copper Center	East Alaska	Central	5,542	Central	33,212	9
Mentasta Lake	East Alaska	Central	143	Adjacent	21,157	9
Denali Park	East Alaska	Central	2,344	Central	1,351	8
Gakona	East Alaska	Central	44	Central	11,718	8
Happy Valley	Ring of Fire	Central	Yes	Central	Yes	8
Kenny Lake	East Alaska	Adjacent	80	Peripheral	12,125	8
King Salmon	Bay	Adjacent	23	Adjacent	0	8
Mendeltna	East Alaska	Peripheral	1,744	Central	22,191	8
Petersville	Ring of Fire	Central	Yes	Central	Yes	8
Point MacKenzie	Ring of Fire	Central	Yes	Central	Yes	8
Silver Springs	East Alaska	Central	Yes	Central	Yes	8
Talkeetna	Ring of Fire	Central	1,114	Central	2,162	8
Tazlina	East Alaska	Adjacent	67	Central	5,701	8
Tonsina	East Alaska	Central	1,752	Peripheral	28,920	8
Trapper Creek	Ring of Fire	Central	4,841	Central	1,458	8
Nelchina	East Alaska	Peripheral	1,744	Peripheral	22,191	7
Sunrise	Ring of Fire	Central	Yes	Peripheral	Yes	7

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Tolsona	East Alaska	Central	0.05	Central	1,052	7
Anderson	East Alaska	Peripheral	2,222	Peripheral	1,370	6
Chase	Ring of Fire	Central	174	Central	329	6
Chitina	East Alaska	Central	32	Peripheral	5,451	6
Eureka Roadhouse	East Alaska	Peripheral	Yes	Peripheral	Yes	6
Fox River	Ring of Fire	Peripheral	Yes	Peripheral	Yes	6
Halibut Cove	Ring of Fire	Peripheral	Yes	Peripheral	Yes	6
Healy	East Alaska	Peripheral	4,747	Peripheral	1,247	6
Naknek	Bay	Central	23	Central	0	6
Nikolaevsk	Ring of Fire	Central	0	Central	5	6
Ninilchik	Ring of Fire	Central	1	Central	147	6
Point Possession	Ring of Fire	Peripheral	Yes	Peripheral	Yes	6
South Naknek	Bay	Central	23	Central	0	6
Tanacross	East Alaska	Peripheral	27	Peripheral	12,003	6
Tok	East Alaska	Peripheral	143	Peripheral	16,972	6
Ferry	East Alaska	Peripheral	2,962	Peripheral	51	5
Glacier View	East Alaska	Central	9	Peripheral	5	5
Hope	Ring of Fire	Central	0	Peripheral	82	5
Iliamna	Bay	Peripheral	15	Central	1	5
Nabesna	East Alaska	Peripheral	92	Peripheral	7,045	5
Northway	East Alaska	Peripheral	27	Peripheral	3,195	5
Paxson	East Alaska	Peripheral	5	Peripheral	2,875	5
Whittier	Ring of Fire	Peripheral	183	Peripheral	2,418	5
Chickaloon	Ring of Fire	Central	9	Peripheral	0	4
Cooper Landing	Ring of Fire	Peripheral	42	Peripheral	568	4
Dot Lake	East Alaska	Peripheral	27	Peripheral	614	4
Ekwok	Bay	Peripheral	20	Peripheral	0	4
Lake Louise	East Alaska	None	0	Central	2,954	4
Levelock	Bay	Central	4	Peripheral	0	4
McGrath	Bering Sea-Western Interior	Central	Yes	None	0	4
Nanwalek	Ring of Fire	Peripheral	0	Peripheral	261	4
Pope-Vannoy Landing	Bay	None	0	Central	Yes	4
Seldovia	Ring of Fire	Peripheral	38	Peripheral	349	4
Susitna	Ring of Fire	Central	0	Central	0	4
Takotna	Bering Sea-Western Interior	Central	Yes	None	0	4



Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Tyonek	Ring of Fire	Peripheral	0	Peripheral	0	4
Wales	Kobuk-Seward Peninsula	Adjacent	647	None	0	4
Willow Creek	East Alaska	Central	0	Central	0	4
Ambler	Kobuk-Seward Peninsula	Peripheral	4,736	None	0	3
Cordova	East Alaska	Peripheral	Yes	None	0	3
Crown Point	Ring of Fire	Peripheral	Yes	None	0	3
Kiana	Kobuk-Seward Peninsula	Peripheral	4,736	None	0	3
Kotzebue	Kobuk-Seward Peninsula	Peripheral	4,755	None	0	3
Lake Minchumina	Bering Sea-Western Interior	Adjacent	0	None	0	3
Moose Pass	Ring of Fire	Peripheral	Yes	None	0	3
Newhalen	Bay	None	0	Central	1	3
Nome	Kobuk-Seward Peninsula	Central	45	None	0	3
Nondalton	Bay	None	0	Central	1	3
Noorvik	Kobuk-Seward Peninsula	Peripheral	4,736	None	0	3
Pedro Bay	Bay	None	0	Central	72	3
Port Alsworth	Bay	None	0	Central	1	3
Teller	Kobuk-Seward Peninsula	Peripheral	Yes	None	0	3
White Mountain	Kobuk-Seward Peninsula	Peripheral	Yes	None	0	3
Beluga	Ring of Fire	Peripheral	0	Peripheral	0	2
Clark's Point	Bay	Peripheral	3	None	0	2
Dillingham	Bay	Peripheral	1	None	0	2
Egegik	Ring of Fire	Peripheral	0	Peripheral	0	2
Haines	Ring of Fire	Central	0	None	0	2
Klukwan	Ring of Fire	Central	0	None	0	2
Kokhanok	Bay	None	0	Peripheral	72	2
Skwentna	Ring of Fire	Peripheral	0	Peripheral	0	2
Tetlin	East Alaska	Peripheral	0	Peripheral	0	2
Diomede	Kobuk-Seward Peninsula	Peripheral	0	None	0	1
Dry Creek	East Alaska	Peripheral	0	None	0	1
Koliganek	Bay	Peripheral	0	None	0	1
Lower Kalskag	Bering Sea-Western Interior	Peripheral	0	None	0	1
Noatak	Kobuk-Seward Peninsula	Peripheral	0	None	0	1
Portage Creek	Bay	None	0	Peripheral	0	1
Akiachak	Bering Sea-Western Interior	None	0	None	0	0
Akiak	Bering Sea-Western Interior	None	0	None	0	0
Aleknagik	Bay	None	0	None	0	0

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Aniak	Bering Sea-Western Interior	None	0	None	0	0
Anvik	Bering Sea-Western Interior	None	0	None	0	0
Brevig Mission	Kobuk-Seward Peninsula	None	0	None	0	0
Buckland	Kobuk-Seward Peninsula	None	0	None	0	0
Chuathbaluk	Bering Sea-Western Interior	None	0	None	0	0
Crooked Creek	Bering Sea-Western Interior	None	0	None	0	0
Deering	Kobuk-Seward Peninsula	None	0	None	0	0
Ekuk	Bay	None	0	None	0	0
Elim	Kobuk-Seward Peninsula	None	0	None	0	0
Galena	Bering Sea-Western Interior	None	0	None	0	0
Georgetown	Bering Sea-Western Interior	None	0	None	0	0
Golovin	Kobuk-Seward Peninsula	None	0	None	0	0
Grayling	Bering Sea-Western Interior	None	0	None	0	0
Holy Cross	Bering Sea-Western Interior	None	0	None	0	0
Huslia	Bering Sea-Western Interior	None	0	None	0	0
Igiugig	Bay	None	0	None	0	0
Kivalina	Kobuk-Seward Peninsula	None	0	None	0	0
Kobuk	Kobuk-Seward Peninsula	None	0	None	0	0
Koyuk	Kobuk-Seward Peninsula	None	0	None	0	0
Manokotak	Bay	None	0	None	0	0
Marshall	Bering Sea-Western Interior	None	0	None	0	0
Napaimute	Bering Sea-Western Interior	None	0	None	0	0
New Stuyahok	Bay	None	0	None	0	0
Nikolai	Bering Sea-Western Interior	None	0	None	0	0
Pilot Station	Bering Sea-Western Interior	None	0	None	0	0
Platinum	Bay	None	0	None	0	0
Red Devil	Bering Sea-Western Interior	None	0	None	0	0
Russian Mission	Bering Sea-Western Interior	None	0	None	0	0
Saint Mary's	Bering Sea-Western Interior	None	0	None	0	0
Saint Michael	Bering Sea-Western Interior	None	0	None	0	0
Selawik	Kobuk-Seward Peninsula	None	0	None	0	0
Shageluk	Bering Sea-Western Interior	None	0	None	0	0
Shaktolik	Kobuk-Seward Peninsula	None	0	None	0	0
Shungnak	Kobuk-Seward Peninsula	None	0	None	0	0
Sleetmute	Bering Sea-Western Interior	None	0	None	0	0
Stebbins	Bering Sea-Western Interior	None	0	None	0	0

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Stony River	Bering Sea-Western Interior	None	0	None	0	0
Tatitlek	East Alaska	None	0	None	0	0
Telida	Bering Sea-Western Interior	None	0	None	0	0
Togiak	Bay	None	0	None	0	0
Tuluksak	Bering Sea-Western Interior	None	0	None	0	0
Twin Hills	Bay	None	0	None	0	0
Unalakleet	Bering Sea-Western Interior	None	0	None	0	0
Upper Kalskag	Bering Sea-Western Interior	None	0	None	0	0

Notes:

Distance from Community categorized as follows:

None (no color) = No subsistence use area overlap with 17(d)(1) revocations, or (if use area data not available), community more than 50 miles from 17(d)(1) revocations.

Peripheral (yellow) = Community over 25 miles from 17(d)(1) revocations.

Central (orange) = Community between 5 and 25 miles from 17(d)(1) revocations.

Adjacent (red) = Community within 5 miles of 17(d)(1) revocations.

Acreage categorized as follows:

0 = None

Yes (gray) = Assumed overlap based on 50-mile radius from community.

Low (yellow) = < 1,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

Medium (orange) = between 1,000 and 10,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

High (red) = > 10,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

Impact ranking (calculated by summing the values for each community) categorized as follows:

None (no color) = zero

Peripheral/less than 1,000 acres (yellow) = 1

Central/between 1,000 and 10,000 acres/"yes" (orange) = 2

Adjacent/over 10,000 acres (red) = 3

\* Areas losing Federal subsistence use priority as a result of the decision from the draft EIS are State top filings that are not otherwise encumbered that would immediately become effective selections.

## SUBSISTENCE USER ACCESS

Data on subsistence management, subsistence use areas, and the timing of subsistence activities, all of which could be affected through revocation of 17(d)(1) withdrawals, are provided in draft EIS Section 3.14, Subsistence, and in draft EIS Appendix G, Subsistence Technical Appendix. These data are relevant to understanding how changes in user access could affect individual communities.

## Loss of Federal Subsistence Priority

As discussed above, under Alternative B, revocation of 17(d)(1) withdrawals on lands with State top filings and no ANC selections would allow State top filings to fall into place and become selections. On these lands, rural residents would lose Federal subsistence priority and instead be subject to State hunting regulations. A change from Federal to ANC management on lands where the State top filed over ANC selections would not affect subsistence management because those lands are not currently available for Federal subsistence priority.

On a state-wide basis, the revocation would not lead to any more or fewer acres removed from the Federal subsistence priority management in the long term because the State's entitlement under the Alaska Statehood Act is finite, but the revocation would shift those impacts to communities that would not have

been impacted but for the revocation. In the short term, the revocation would lead to an increase in lands removed from Federal subsistence priority management because it would add to the State-selected land, but it would not automatically cause the reduction of any overselections. This effect would be temporary, however, as the State either relinquishes its overselections or the BLM rejects the State's overselections pursuant to ANILCA 906(f). Although the loss of Federal subsistence priority on State top filed Priority 1 and 2 lands would be permanent, the loss of Federal subsistence priority on State top filed Priority 3 and 4 lands may be temporary because the State is likely to relinquish Priority 3 and 4 lands back to Federal management eventually. However, until these lands are relinquished by the State or rejected by the BLM, Federal subsistence priority would be lost. Despite this being a temporary effect, even a temporary loss of Federal subsistence priority could result in long-term changes to subsistence harvesting patterns, as subsistence users often adapt quickly to changes to access.

Once conveyed to the State, the BLM cannot guarantee continued subsistence access under ANILCA. Although the State provides for generally allowed uses, which can occur without a permit on most lands, subsistence access is not guaranteed like it is under Federal regulations. Therefore, conveyances, even to the State, can restrict subsistence access even to lands that remain under Federal management.

On 17(d)(1) withdrawals with no ANC or State selections, subsistence is Federally managed, and priority is given to subsistence uses by rural residents as opposed to other uses (e.g., non-rural uses and sport hunting). The Federal Subsistence Board identifies communities with customary and traditional uses of certain species (e.g., the caribou's western Arctic herd); where there is such a determination, only those communities have a subsistence priority in the relevant area (see draft EIS Section 3.14.1.1.1, Subsistence Management). In addition, the Federal Subsistence Board oversees management of subsistence hunting and fishing on Federal public lands and makes decisions based on recommendations from Regional Advisory Councils, which include representation by rural residents. In contrast, from the State management perspective, all Alaska residents, regardless of rural or non-rural residency, qualify as subsistence users, and there is no subsistence priority for rural residents.

Therefore, how lands are managed for subsistence can have substantial impacts for rural residents who have a higher reliance on wild resources than non-rural Alaska residents. In areas where rural and urban residents have equal subsistence priority (i.e., State-managed lands), particularly in areas popular to outside (i.e., non-rural) hunters, rural residents may experience greater competition for subsistence resources. In circumstances where resource populations are down (e.g., recent decrease in the size of the caribou's western Arctic herd), differences in subsistence management can affect harvester success.

Although in most cases non-rural residents can hunt on Federal lands according to State regulations, in certain circumstances, Federal regulations supersede State regulations. This is often in response to declines in resource populations. For example, on Federal lands in the Kanuti Controlled Use Area in Game Management Unit (GMU) 24B, taking of moose is only permitted by Federally qualified subsistence users in Unit 24, Koyukuk, and Galena (Alaska Department of Fish and Game 2022; Federal Subsistence Management Program 2020). In GMU 23 along the Noatak River, caribou hunting is closed to non-rural users (Federal Subsistence Management Program 2020). In recent years, there have been similar closures for salmon harvesting along the Kuskokwim River.

In addition to hunting closures for non-rural residents, rural residents sometimes benefit from Federal subsistence priority through expanded or earlier hunting seasons, which increase their access to hunting grounds. For example, in GMU 13, the moose hunting season for Federally qualified subsistence users on Federal lands begins on August 1. According to State regulations, the earliest moose hunt, which is available only by application, is August 20, and all other seasons begin September 1 (Alaska Department of Fish and Game 2022; Federal Subsistence Management Program 2020). The earlier moose hunting

season for rural residents provides an advantage to these residents so that they can begin hunting over 2 weeks before non-rural hunters.

In the examples above, a loss of Federal subsistence priority on certain lands would reduce access and remove advantages for rural residents, resulting in increased competition with non-rural residents and reduced harvesting success.

Under all alternatives, the East Alaska planning area would see the greatest number of communities and lands affected by a loss of Federal subsistence priority. The East Alaska planning area could be particularly vulnerable to a loss of Federal subsistence priority because much of the planning area is roaded and connected to larger urban hubs (Anchorage and Fairbanks), the area is more densely populated, and competition among rural users and between rural and nonrural users is high. As an example of the high use of the area, the Glennallen Field Office, located in the East Alaska planning area, issues approximately 65 percent of all Federal subsistence permits in Alaska, and the Wrangell-St. Elias National Park and Preserve, located in the same planning area, issues an additional 12 percent of all Federal subsistence permits. Other planning areas are less likely to require Federal subsistence permits because they have fewer users overall. Between 2010 and 2022, permits for moose and caribou hunting in Unit 13 were issued primarily to residents of Delta Junction, Copper Center, Glennallen, Gakona, Kenny Lake, Tazlina, Cantwell, Slana, Chickaloon, Glacier View, and Gulkana (BLM 2023). Five of these communities are adjacent to (within 5 miles of) some lands that would lose subsistence priority under Alternative B (see draft EIS Table 3.14-5).

### **Increased Lands Open to Development**

Under Alternative B, revocation of 17(d)(1) withdrawals on lands with State top filings and no ANC selections would allow State top filings to fall into place and become selections. It is assumed the selections could then be conveyed to the State within 10 years of the Secretary's decision. Once these selections have been conveyed, the State would hold the lands free of restrictions by the Federal government of how to use the lands. The State could authorize rights-of-way (ROWs), mineral exploration/development, and other development projects. Under Alternative B, development would be most likely to impact the 55 communities with subsistence use areas overlapping lands more likely to be developed.

Development would affect user access by introducing infrastructure and human activity into previously undeveloped areas, and by imposing security and land use restrictions on local residents. Legal or regulatory barriers would reduce user access to traditional use areas. For example, hunters would be subject to restrictions regarding discharging firearms near pipelines, roads, buildings, and other facilities. Depending on the restricted distance at which a firearm can be discharged, subsistence users could have difficulty hunting in certain areas, particularly where pipelines or roads parallel the coastal or riverine areas. Miscommunication surrounding rules and restrictions around development and unpleasant interactions with oil field, mine, and other workers may dissuade residents from accessing development areas.

Infrastructure associated with mineral (including oil and gas) exploration, development, and production, in addition to other non-oil and gas infrastructure projects, could include future gravel and ice roads, pipelines, gravel pads, bridges, gravel mines, and runways. Infrastructure could cause direct loss of subsistence use areas for analysis communities in the five planning areas. Loss of subsistence use areas could result in 1) residents having to travel farther to access more suitable hunting areas and 2) the loss of opportunities to pass on knowledge regarding particular hunting and harvesting areas to the next generation.

Development of roads, pipelines, and other linear infrastructures can present barriers (either perceived or actual) for subsistence users. Infrastructure such as roads, bridges, and pipelines can act as physical obstructions to subsistence users, particularly if they are not designed to account for overland travel by snowmachine or four-wheeler, or if bridges and causeways obstruct boat travel along rivers or coastlines. For example, hunters traveling overland by snowmachine may not be able to cross over high roads, particularly when pulling a heavy load. In addition, hunters may have to divert around infrastructure (e.g., construction material sites) or mine pits for safety reasons. Bridges can affect boat travel along smaller waterways or in unusually high water conditions. In most regions, subsistence users may travel along coastal areas or rivers by boat to hunt caribou, moose, and other resources. The existence of infrastructure in these areas may affect these hunting activities if hunters are not able to shoot inland due to the presence of roads and pipelines and concerns about safety. Similarly, in areas where residents use roads to access hunting areas, pipelines and other infrastructure placed along roadways can obstruct offroad travel and hunting.

In some cases, roads that are built in support of development projects may be open to local residents to use, and in these cases, roads can provide a benefit to subsistence users by increasing access to new or traditional use areas. Roads can be particularly beneficial to residents with no boats, snowmachines, or four-wheelers. In addition, roads can facilitate access into traditional harvesting areas at times when access is difficult, such as during spring breakup when rivers are not yet navigable and snow conditions are poor. Potential negative effects on user access associated with increased road use include increased competition within and between rural communities, and a shift in use toward road-accessible areas and away from other traditional hunting and harvesting areas. Roads connecting rural communities to one another can increase competition between communities by concentrating hunters along corridors and affecting community use area patterns. In addition, reduced use of traditional areas due to a shift toward road-based hunting can limit opportunities to pass on knowledge to younger generations regarding traditional places and their associated uses.

If roads are constructed but are closed to local access for security or other reasons, then they would have larger direct effects on subsistence user access. If residents are physically unable to cross over roads or under pipelines, or if they are restricted to crossing in designated crossing areas only, they may have to travel farther in order to access harvesting areas. Although road access for local subsistence users may be restricted, it is possible that both residents and nonlocal hunters would use cleared ROWs as travel corridors to access hunting areas, thus increasing local competition along the corridor.

Roads built from the main transportation system into previously roadless areas would have the greatest impact on local communities, subsistence economies, and culture. Local communities and subsistence users would experience both an increase in access in addition to increased competition from outside residents. Studies comparing road-connected to non-road-connected communities show that road-connected communities have substantially lower subsistence harvests than non-road-connected communities (Guettabi et al. 2016; Magdanz et al. 2016).

Although actual infrastructure would likely be limited to a small proportion of communities' overall subsistence use areas, areas excluded from subsistence use would likely be greater than the actual footprint of a development project due to security and firearm restrictions or general avoidance by hunters.

## **SUBSISTENCE RESOURCE ABUNDANCE**

Data on subsistence harvest amounts and participation levels, which could be affected through revocation of 17(d)(1) withdrawals, are provided in draft EIS Section 3.14.2.1, Affected Environment, and in draft

EIS Appendix G, Subsistence Technical Appendix. These data are relevant to understanding how changes in resource abundance could affect individual communities.

### **Loss of Federal Subsistence Priority**

A loss of Federal subsistence priority could impact resource abundance for subsistence users if there is an increase in the number of hunters taking resources or an increase in harvests, particularly where resource populations are already vulnerable and where Federal regulations prohibit hunting by non-rural residents. For example, in GMU 23 along the Noatak River, caribou hunting is closed to non-rural users (Federal Subsistence Management Program 2022). In other cases, the Federal Subsistence Board has approved special actions to temporarily close Federal lands to hunting and fishing (e.g., Kuskokwim River salmon fishery) by non-Federally qualified users. Such restrictions are meant to address declines resource populations and to allow for the continuation of subsistence uses pursuant to ANILCA 815. If these lands changed from Federal to State management, this priority for rural residents would no longer exist, and local residents would likely see an increase in outside hunters on certain lands, thus increasing pressure on resource populations. Impacts on resource abundance would be more likely to occur if revocation of 17(d)(1) withdrawals results in loss of Federal subsistence priority over a large area or in a key habitat for a specific resource.

### **Increased Lands Open to Development**

The analysis communities all rely on harvests of subsistence resources, including large land mammals, marine mammals, salmon, non-salmon fish, furbearers and small land mammals, migratory birds, upland game birds, marine invertebrates, and vegetation. Levels of resource use, in addition to resource focus, vary by community and region and depend on community location, cultural preferences, and the availability of different resources within a community's subsistence use area. In terms of contribution toward the total subsistence harvest, large land mammals, salmon, and non-salmon fish are typically among the top harvested resource categories across all planning areas (see the Harvest Data section in draft EIS Appendix G, Subsistence Technical Appendix). Household participation in subsistence activities is high across all planning areas, with over half of households in all planning areas participating in subsistence harvesting of non-salmon fish, large land mammals, and vegetation (see the Harvest Data section in draft EIS Appendix G, Subsistence Technical Appendix).

As discussed in draft EIS Section 3.15, Terrestrial Mammals; Section 3.7, Fish and Aquatic Species; and Section 3.2, Birds and Special Status Bird Species, mineral and other development on 17(d)(1) revocations under Alternative B could cause individual mortalities for caribou, moose, fish, and birds, although the potential for population-level effects under Alternative B is less likely than under the other alternatives. Localized changes in resource numbers could affect resource abundance for subsistence users. Although changes to resource abundance would be most likely to affect the 61 communities with subsistence use areas overlapping lands more likely to be developed under Alternative B, impacts to migratory resources such as caribou and fish could extend outside 17(d)(1) revocations to subsistence users who harvest these resources elsewhere. Development would be most likely to have population-level effects if it displaces resources from key habitat areas or has a substantial risk of large-scale contamination events (e.g., mining or oil development). Alternative B revokes large areas that overlap the range of the Nelchina, Western Arctic, and Denali caribou herds, including the migratory and winter range of the Western Arctic herd. Alternative B would retain 17(d)(1) withdrawals in high-value watersheds for fisheries and water quality, thus reducing the likelihood of population-level impacts to fish.

Development and other infrastructure (e.g., mines, drill sites, roads, ROWs, pipelines, and buildings) and activities would result in the removal, disturbance, or degradation of habitat for resources such as

terrestrial mammals (caribou, moose), waterfowl, and fish, in addition to causing direct mortality. Construction activities that could affect resource abundance through removal or disturbance of habitat include blasting/mining, operation of construction equipment, excavation, placement of gravel, placement of ice roads and ice pads, construction noise, human presence, water withdrawal, installation of bridges and culverts, and air and ground traffic. Operation activities that could affect resource abundance would include transport of materials, accidental release of contaminants, vehicle and aircraft collisions, and ongoing loss of habitat due to the presence of infrastructure and human activity.

Habitat loss and disturbance can reduce calving rates and survival for terrestrial mammals, thus reducing their overall abundance. Caribou can be particularly sensitive to disturbances to calving grounds. In recent years, several herds within the five planning areas have experienced dramatic declines in herd size; these include the Western Arctic herd, Mulchatna herd, and Nelchina herd (see draft EIS Section 3.15, Terrestrial Mammals and Special Status Species). Moose are relatively widespread across the planning areas. A decrease in forage could affect caribou herd survival rates, particularly during winter when access to foraging grounds is more difficult. Mining could result in accidental discharges of chemicals and heavy metals, as well as dust deposition, which could affect terrestrial mammal (e.g., caribou, moose) health (and the health of humans who consume these resources) and displace these animals from foraging habitat (see draft EIS Section 3.15, Terrestrial Mammals). Increased exposure to aircraft disturbance may also affect body condition through increased energy expenditures (e.g., more time fleeing versus feeding or resting) (Sullender 2017). Furthermore, increased energy expenditures may result in reduced foraging rates and, ultimately, decreased mating success/pregnancy rates.

Certain activities such as pile driving, construction sedimentation, and stream diversions may alter or degrade fish habitat, thereby reducing egg survival downstream. The presence of roads and ROWs in addition to buildings, culverts, bridges, and gravel infrastructure could alter and degrade fish habitat both upstream and downstream from development projects, which could affect fish abundance for subsistence users in certain waterways. Waterfowl nesting and feeding near development infrastructure or mine and gravel sites may also experience direct habitat loss or may ingest chemicals associated with construction activities and dust deposition.

In addition to impacts associated with habitat disturbance, fragmentation, and degradation, development projects may also result in direct mortality of individual animals. Terrestrial mammals such as caribou and moose may experience direct mortality through vehicle strikes, particularly if they use roadways or ROWs as movement corridors or for insect relief. Individual animals may become ill through ingestion of chemicals used during development construction or operation. Clearing and grading along roads and ROWs could cause an increase in wildlife mortality (e.g., due to destruction of dens or clearing of habitat), particularly for resources such as small land mammals. If development activities occur within key habitat areas, such as calving grounds, then they would be more likely to affect herd survival (see draft EIS Section 3.15, Terrestrial Mammals).

Fish could experience direct mortality through construction activities (e.g., driving of bridge piles), through water withdrawals (e.g., for the construction of ice roads or use as a water source), or through release of contaminants (e.g., oil spills). Water withdrawal may kill individual fish but would likely not have population-level effects. Mining could result in degradation of water quality through release of chemicals, heavy metals, and fugitive dust; increased sedimentation and changes in water quality could affect fish spawning grounds and egg survival (see draft EIS Section 3.7, Fish and Aquatic Species). Waterfowl could experience direct mortality through aircraft collisions or collisions with buildings. Accidental discharges of chemicals and heavy metals, in addition to fugitive dust, could result in habitat loss and degradation for waterfowl (see draft EIS Section 3.2, Birds and Special Status Bird Species). Although unlikely, large spills on land or in waterways could kill large numbers of waterfowl and fish. Finally, direct loss of vegetation resulting from gravel mining, gravel placement, infrastructure placement



(e.g., roads, ice pads), accidental spills or discharges, and fugitive dust from roadways would cause decreased local abundance of vegetation (e.g., berries, wild greens) (see draft EIS Section 3.16, Vegetation, Wetlands, and Special Status Plants), a key subsistence resource for many communities, near development projects.

Finally, if development and infrastructure projects result in an increase in local population (e.g., project workers move to the development region, or construction of roads results in more people moving to an area due to increased access), then harvesting pressure on local resources could increase, affecting resource populations.

## **SUBSISTENCE RESOURCE AVAILABILITY**

Data on subsistence harvest amounts and participation levels, which could be affected through revocation of 17(d)(1) withdrawals, are provided in draft EIS Section 3.14.2.1, Affected Environment, and in draft EIS Appendix G, Subsistence Technical Appendix. These data are relevant to understanding how changes in resource availability could affect individual communities.

### **Loss of Federal Subsistence Priority**

Similar to the impacts on resource abundance described above, a loss of Federal subsistence priority could increase the number of hunters taking resources in addition to the number of resources being taken, thus increasing competition and reducing resource availability to local rural users. This would occur primarily in areas where resources are scarce, populations are vulnerable, and Federal regulations currently prohibit hunting of those resources by non-rural residents.

### **Increased Lands Open to Development**

As discussed above (Subsistence Resource Abundance), across all five planning areas, large land mammals, salmon, and non-salmon fish are typically among the top harvested resource categories (see the Harvest Data section in draft EIS Appendix G, Subsistence Technical Appendix). In addition, on average, over half of households in the planning areas participate in subsistence harvesting of non-salmon fish, large land mammals, and vegetation (see the Harvest Data section in draft EIS Appendix G, Subsistence Technical Appendix). Therefore, impacts to the migration, distribution, or behavior of these resources could have substantial impacts on their availability to the analysis communities.

Revocation of withdrawals under Alternative B would result in State top filings becoming effective selections. Once these selections have been conveyed, the State could authorize ROWs, mineral exploration/development, and other development projects. These projects could result in new infrastructure (e.g., roads, pipelines, bridges, culverts, buildings, mine pits) and an increase in activity to support development, including ground and air traffic, construction activity and noise, and an increase in human presence.

Potential impacts on resource availability resulting from the abovementioned development infrastructure and activities include the displacement of resources from areas of development activity, diversion of resources from their usual migratory routes (e.g., caribou), contamination, and skittish behavior, all of which may result in reduced harvest opportunities. This general disturbance of wildlife could result in subsistence resources being unavailable at the times and places that subsistence users are accustomed to finding them. Impacts to resource availability would be most likely for the 55 analysis communities with subsistence use areas overlapping lands more likely to be developed under Alternative B (see Table C-1). If development causes large-scale changes in migratory patterns for resources such as caribou and fish, then more communities could be affected. The magnitude of impacts from development, including the

number of communities impacted, would depend on the types and location of development projects that occur.

Below are resource-specific discussions of potential development-related impacts to resource availability for the communities most likely to be affected. Impacts to the availability of marine mammals and marine invertebrates directly resulting from revocation of 17(d)(1) withdrawals are relatively unlikely, as all withdrawals are on land.

### ***Terrestrial Mammals***

Across all five planning areas, terrestrial mammals are among the top harvested species (see draft EIS Section 3.14) by community. Moose is among the top species harvested in all planning areas. Caribou is among the top species harvested in all regions except the Bering Sea-Western Interior planning area. Deer is targeted only in the Ring of Fire and East Alaska (Prince William Sound subregion) planning areas.

Because of their migratory nature, caribou-related impacts have a greater potential to extend outside the immediate area of a development project. Impacts on the resource availability of caribou may result from changes in caribou migration, distribution, behavior, and health. Air traffic to support development projects has caused a commonly reported and observed impact on caribou on the North Slope and in Northwest Alaska (Georgette and Loon 1988; Stephen R. Braund & Associates [SRB&A] 2009, 2018; Sullender 2017). Air traffic is observed to cause behavioral changes, skittish behavior, and delayed or diverted crossing behavior, which in turn have impacts on caribou hunting success for local hunters. Harvesters report that air traffic can cause skittish behavior in caribou in addition to moose, causing them to stay inland away from riversides or diverting them from usual routes. Because revocation of withdrawals could increase the amount of development occurring on those lands, an associated increase in air traffic could impact the availability of caribou and other resources.

ROWs would have the largest impacts to terrestrial mammal availability because they extend across large areas and can result in changes to resource migrations and availability (see draft EIS Section 3.15, Terrestrial Mammals). Linear features such as roads and pipelines can alter caribou movement (see draft EIS Section 3.15, Terrestrial Mammals). Roads and associated road traffic are believed to cause behavioral and migratory changes in caribou, which can affect hunting success. Deflections or delays of caribou movement from roads and associated ground traffic and human activity have been documented in the traditional knowledge of harvesters (SRB&A 2014, 2018, 2023) and during behavioral studies on caribou, particularly for maternal caribou (ABR, Inc., and SRB&A 2014; see draft EIS Section 3.15, Terrestrial Mammals). Impacts from roads are particularly high during times of high ground traffic. Because ROWs including roads would be a necessary component of any development, the revocation could lead to negative impacts for terrestrial mammals.

Impacts to moose and deer availability would generally be on a smaller geographic scale than for caribou because these resources have smaller ranges and because residents do not rely on seasonal migratory movements when hunting them. Therefore, impacts to hunting would occur primarily near roads and other development areas where these resources could exhibit avoidance, skittishness, or other behavioral changes. Although moose may initially exhibit avoidance of road corridors and development areas, they also tend to habituate relatively quickly to human activity (see draft EIS Section 3.15, Terrestrial Mammals). Moose and deer may also be attracted to ROWs as movement corridors or because of the availability of new vegetation in retained areas, which could affect the distribution of the resources in addition to creating hunting corridors due to a higher concentration of moose within the ROWs.

Development could also affect the availability of furbearers to hunters and trappers. Residents in development areas have reported that furbearers such as wolves and wolverine can be particularly sensitive to noise and human activity and tend to avoid developed areas (SRB&A 2009). This could affect

availability of these resources to furbearer harvesters, particularly if development occurs near existing traplines.

### **Birds**

Analysis communities in the five planning areas harvest both waterfowl and upland birds, with waterfowl generally harvested in greater quantities and by a larger segment of the population (see the Harvest Data section in draft EIS Appendix G, Subsistence Technical Appendix). Impacts to resource availability of waterfowl may include changes in distribution due to removal of habitat and disturbance from development-related noise, traffic, and human activity (see draft EIS Section 3.2, Birds and Special Status Bird Species). Noise; human presence; and ground, vessel, and air traffic during construction and operations of development projects may also cause temporary disturbances to or displacement of waterfowl, causing temporary changes to harvester success, particularly if these activities occur during the spring or fall waterfowl hunting season. Waterfowl hunters often hunt in small, specific locations and at hunting camps. Therefore, although overall disturbance of waterfowl habitat may be low, in certain areas there may be larger impacts to waterfowl hunters if displacement from traditional hunting areas occurs. In general, impacts would likely affect resource availability on an individual level but not at a community level.

### **Fish**

Fish species are among the top species harvested in all five planning areas, with both salmon and non-salmon fish typically making up a substantial portion of communities' annual harvest. Fish are harvested in marine waters, along rivers, and in lakes. Commonly harvested anadromous fish species in the planning areas include salmon, whitefish, smelt, and Dolly Varden. Common marine fish species include halibut, herring, cod, and rockfish. Lake and riverine species include northern pike, grayling, and lake trout.

Construction activities tied to the reasonably foreseeable development that may affect fish availability to subsistence communities include installation of bridges and culverts, related pile installation, stream diversions, stream excavation, water withdrawal, blasting at material sites, and contamination. Fish could be temporarily diverted, displaced, or obstructed due to culvert placement, excavation, or stream diversion. Ice roads and pads may also temporarily block fish passage if the compacted ice takes longer to melt. Construction activities in waterways could also increase stream turbidity that could affect downstream harvesting areas or make these areas less desirable for fishing in the short term.

Streams and riverbeds may experience increased sedimentation or alteration over time due to placer mining or suction dredge mining, or the presence of culverts and bridge piers. If culverts and bridges are not properly maintained or if erosion control measures are not taken, fish migrations could be temporarily disrupted or blocked, which could reduce fish availability for subsistence users (see draft EIS Section 3.7, Fish and Aquatic Species). Ice roads and pads may also temporarily block fish passage if the compacted ice takes longer to melt. The risk of contamination from dust deposition, discharge of chemicals or heavy metals, and fuel or contaminant spills would continue through the life of any project; depending on the magnitude, spills could have far-reaching impacts on upstream and downstream subsistence users. Avoidance of fish and contamination concerns may be particularly likely for subsistence users in drainages that are downstream from mining activities.

The introduction of invasive species (both fish and/or aquatic plants) could also impact fish habitat and/or productivity and impact fish availability to subsistence users. The introduction of invasive species could become a long-term impact if their spread is uncontrolled, reducing fish availability for subsistence users in the planning areas. If fuel or other contaminant spills occur near fish-bearing streams, subsistence harvesters may avoid harvesting fish if they are perceived (or confirmed) to be contaminated or

unhealthy. In the case of larger spills, contamination concerns and avoidance may extend to communities located downstream from project footprints.

Changes in the availability of fish species would be most likely to affect subsistence users in the 61 communities with use areas overlapping lands more likely to be developed under Alternative B. However, communities downstream from the decision area could experience impacts if projects result in changes in fish distribution or the timing of fish migrations. Subsistence users often harvest different fish species at specific times and places, and if these patterns are disrupted, they may experience declines in harvest success or have difficulty accessing traditional use areas when resources become available in those areas (e.g., if the fish arrive late and subsistence users cannot use boats to access them).

### ***Vegetation***

Harvesting of vegetation is a key subsistence activity across all planning areas, particularly in terms of community participation. Across the five planning areas, an average of between 63% and 90% of households participate in vegetation harvesting annually.

Development activities that may affect the availability of vegetation may include clearing of ROWs and other lands for infrastructure, fugitive dust from roadways, and contamination from fuel spills. Infrastructure development would result in the removal of vegetation and could directly affect berry and plant harvesting areas for local communities. Residents often pick berries in small, discrete areas, sometimes with only one harvesting spot for a less commonly found species. Thus, removal of those areas could have impacts on individual harvesters or, in the case of community-wide berry patches, could extend to a community-wide impact.

### ***Evaluation of the Availability of Other Lands***

ANCSA 17(d)(1) withdrawals were originally withdrawn in 1972–1973 pursuant to ANCSA. The purpose sought to be achieved by the BLM is to review the revocation of 17(d)(1) withdrawals as indicated in PLOs 7899 through 7903, and to provide for the orderly management of the public lands in the decision area in a way that is consistent with the purposes of the 17(d)(1) withdrawals to ensure “the public interest in these lands is properly protected.” For Alternative B specifically, the purpose of this alternative would be to provide the State with all of their Priority 1 and 2 top filings so that they can complete their selections and fulfill their entitlements. The State currently has more than adequate effective selections to fulfill its entitlement, but the lands within the revocation would include lands for which the State has expressed a greater desire to receive than its current selections. This alternative revokes all 17(d)(1) withdrawals with State Priority 1 and 2 top filings, except for lands identified as having more than minimal conflict with natural resources, cultural resources, subsistence resources, recreational resources, or proposed or existing ACECs. No other lands within the evaluation area were identified as State Priority 1 or 2 top filings without important natural resources, cultural resources, subsistence resources, recreational resources, or proposed or existing ACECs.

### ***Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes***

Alternative B only revokes the 17(d)(1) withdrawals in part to allow for the selection of lands under the Alaska Statehood Act, which allows the top filed selection to fall into place. The amount of land the State can receive is defined by the Alaska Statehood Act, and no actions taken by the BLM can reduce or eliminate that disposition of the public lands. The only other alternative considered is to not revoke the

17(d)(1) withdrawals, which would not reduce the disposition of public lands but merely shift it to another part of the State.

## Findings

This evaluation concludes that Alternative B may result in significant restriction to subsistence uses affecting user access, abundance, and availability of subsistence resources for 65 rural communities that are peripheral, adjacent, or central to withdrawals. Subsistence user access for those communities may be affected due to a loss of Federal subsistence priority, resulting in an increase in competition for subsistence resources from non-rural, Federally non-qualified hunters. See Table C-3 for a list of the analyzed communities where this action may significantly restrict subsistence uses and where it would not significantly restrict subsistence uses due to the loss of Federal subsistence priority.

In addition, revocation of withdrawals may result in unselected Federal lands becoming open to mineral entry and leasing, which could cause an increase in potential for resource development, which may result in significant restriction to subsistence uses affecting user access and resource abundance and availability for 55 rural communities that overlap or are adjacent to withdrawals. This evaluation assumes that the potential for ROWs, mineral exploration and development, and other development projects would increase when the lands are conveyed to the State, especially in areas identified as more likely to be developed. See Table C-3 for a list of the analyzed communities where this action may significantly restrict subsistence uses and where it would not significantly restrict subsistence uses due to opening lands to mineral extraction in areas more likely to be developed.

**Table C-3. Summary of Findings, Alternative B**

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Akiachak		X		X
Akiak		X		X
Aleknagik		X		X
Ambler	X			X
Anderson	X		X	
Aniak		X		X
Anvik		X		X
Beluga		X		X
Brevig Mission		X		X
Buckland		X		X
Cantwell	X		X	
Chase	X		X	
Chickaloon	X			X
Chistochina	X		X	
Chitina	X		X	
Chuathbaluk		X		X

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Clark's Point	X			X
Cooper Landing	X		X	
Copper Center	X		X	
Cordova	X			X
Crooked Creek		X		X
Crown Point	X			X
Deering		X		X
Denali Park	X		X	
Dillingham	X			X
Diomedede		X		X
Dot Lake	X		X	
Dry Creek		X		X
Egegik		X		X
Ekuk		X		X
Ekwok	X			X
Elim		X		X
Eureka Roadhouse	X		X	
Ferry	X		X	
Fox River	X		X	
Gakona	X		X	
Galena		X		X
Georgetown		X		X
Glacier View	X		X	
Glennallen	X		X	
Golovin		X	X	X
Grayling		X		X
Gulkana	X		X	
Haines		X		X
Halibut Cove	X		X	
Happy Valley	X		X	
Healy	X		X	
Holy Cross		X		X
Hope		X	X	
Huslia		X		X
Igiugig		X		X
Iliamna	X		X	

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Kenny Lake	X		X	
Kiana	X			X
King Salmon	X			X
Kivalina		X		X
Klukwan		X		X
Kobuk		X		X
Kokhanok		X	X	
Koliganek		X		X
Kotzebue	X			X
Koyuk		X		X
Lake Louise		X	X	
Lake Minchumina		X		X
Levelock	X			X
Lower Kalskag		X		X
Manokotak		X		X
Marshall		X		X
McGrath	X			X
Mendeltna	X		X	
Mentasta Lake	X		X	
Moose Pass	X			X
Nabesna	X		X	
Naknek	X			X
Nanwalek		X	X	
Napaimute		X		X
Nelchina	X		X	
New Stuyahok		X		X
Newhalen		X	X	
Nikolaevsk		X	X	
Nikolai		X		X
Ninilchik	X		X	
Noatak		X		X
Nome	X			X
Nondalton		X	X	
Noorvik	X			X
Northway	X		X	
Paxson	X		X	

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Pedro Bay		X	X	
Petersville	X		X	
Pilot Station		X		X
Platinum		X		X
Point MacKenzie	X			
Point Possession	X		X	
Pope-Vannoy Landing		X	X	
Port Alsworth		X	X	
Portage Creek		X		X
Red Devil		X		X
Russian Mission		X		X
Saint Mary's		X		X
Saint Michael		X		X
Selawik		X		X
Seldovia	X		X	
Shageluk		X		X
Shaktolik		X		X
Shungnak		X		X
Silver Springs	X		X	
Skwentna		X		X
Slana	X		X	
Sleetmute		X		X
South Naknek	X			X
Stebbins		X		X
Stony River		X		X
Sunrise	X		X	
Susitna		X		X
Susitna North	X		X	
Takotna	X			X
Talkeetna	X		X	
Tanacross	X		X	
Tatitlek		X		X
Tazlina	X		X	
Telida		X		X
Teller	X			X
Tetlin		X		X



Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Togiak		X		X
Tok	X		X	
Tolsona		X	X	
Tonsina	X		X	
Trapper Creek	X		X	
Tuluksak		X	X	X
Twin Hills		X		X
Tyonek		X		X
Unalakleet		X		X
Upper Kalskag		X		X
Wales	X			X
White Mountain	X			X
Whittier	X		X	
Willow	X		X	
Willow Creek		X	X	X

## Evaluation and Findings for Alternative C (Partial Revocation)

Under Alternative C, 17(d)(1) withdrawals would be revoked in full on all 17(d)(1) withdrawals that have high mineral potential, including the State of Alaska's top filed lands that overlap these lands. Alternative C would also revoke in part withdrawals on Priority 1 and 2 top filed lands that do not have high mineral potential, for the purposes of opening these lands to selection. All other lands would remain withdrawn. Upon revocation of withdrawals, it is assumed that lands would convert to selections and be conveyed within 10 years of the record of decision. Federal subsistence priority would no longer apply to 343,000 acres of land that become effective selections upon revocation.

Because Alternative C does not take resource conflict concerns into consideration (as Alternative B does) and revokes withdrawals on additional lands with high mineral potential, this alternative would increase the potential for direct impacts to subsistence access. Primary impacts on subsistence user access, resource abundance, and resource availability would result from a change in subsistence management (i.e., loss of Federal subsistence priority) or an increase in the potential for development, and are discussed under Alternative B. Differences under Alternative C are discussed below.

### ***Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need***

Under Alternative C, 7,227,000 acres of current 17(d)(1) withdrawals with high mineral potential would be revoked in full, and an additional 361,000 acres of State top filed Priority 1 and 2 lands would be revoked in part, allowing State top filings to fall into place and become selections on lands where there

are no other encumbrances. Alternative C also includes 120,000 acres of Priority 3 and 4 top filed lands. These lands would become effective State selections and lose the Federal subsistence priority, but only until the selections are relinquished by the State or rejected by the BLM within 10 years due to overselection. Thus, the loss of Federal subsistence priority on State Priority 3 and 4 top filings would be temporary. Although the loss would be temporary as defined in the draft EIS, even a temporary loss of Federal subsistence priority could have longer term effects on subsistence uses because local subsistence users may quickly alter land use patterns in response to changes in land management. On the North Slope, for example, access to industrial roads led to documentable changes in subsistence land patterns within several years of road construction (SRB&A 2023). Alternative C would revoke withdrawals on a greater number of lands than under Alternative B, thus increasing the likelihood of potential impacts to subsistence, particularly related to the potential for development.

Under Alternative C, 110 of the 139 focused analysis area communities use areas that overlap with 17(d)(1) withdrawals that would lose Federal subsistence priority under Alternative C (Table C-3), compared to 65 analysis communities under Alternative B (see Table C-1). This analysis includes lands where there would be a permanent loss of Federal subsistence priority, in addition to lands where there would be a temporary loss of Federal subsistence priority (i.e., State Priority 3 and 4 top filed lands that are eventually relinquished). The planning area with the greatest number of communities potentially affected under Alternative C in terms of a loss of Federal subsistence priority is the East Alaska (31 communities) planning area, followed by the Ring of Fire (24 communities), Bay (22 communities), Bering Sea-Western Interior (20 communities), and Kobuk-Seward Peninsula (14 communities) planning areas.

Twenty-two communities would have a loss of Federal subsistence priority of more than 10,000 acres, 18 of which are in the East Alaska planning area (Table C-4). Based on available data, communities losing the highest percentage of use areas that currently have Federal subsistence priority include Ferry (59 percent), Chickaloon (50 percent; 9 acres), Cantwell (31 percent), and Glacier View (20 percent).

Under Alternative C, 15 communities would lose Federal subsistence priority in some areas adjacent to (i.e., within 5 miles of) their community (see draft EIS Table 3.14-5). These communities include Glennallen, Gulkana, Slana, Kenny Lake, Paxson, and Tazlina in the East Alaska planning area; Susitna North, Talkeetna, Trapper Creek, and Willow in the Ring of Fire planning area; King Salmon and Kokhanok in the Bay planning area; Aniak and Lake Minchumina in the Bering Sea-Western Interior planning area; and Wales in the Kobuk-Seward Peninsula planning area. In addition, 50 communities would lose Federal subsistence priority in some lands central to their subsistence use areas (i.e., within 25 miles of the community), primarily in the East Alaska and Ring of Fire planning areas (see draft EIS Table 3.14-6). These communities are the most likely to experience impacts from a loss of Federal subsistence priority under Alternative C.

Also under Alternative C, 95 of the 139 analysis communities have subsistence use areas overlapping lands more likely to be developed (Table C-4). The planning area with the greatest number of communities potentially affected under Alternative C in terms of an increase in development is the East Alaska (31 communities) planning area, followed by the Ring of Fire (19 communities), Bay (16 communities), Kobuk-Seward Peninsula (16 communities), and Bering Sea-Western Interior (9 communities) planning areas. The individual communities with the greatest number of use areas overlapped by 17(d)(1) revocations more likely to be developed under Alternative C (more than 20,000 acres) are Copper Center, Glennallen, Tonsina, Gulkana, Mendeltna, Nelchina, Mentasta Lake, Nome, and Tok (see Table C-4). Under Alternative C, 15 communities are adjacent to (i.e., within 5 miles of) 17(d)(1) revocations more likely to be developed, comprising seven communities in the East Alaska planning area, five communities in the Ring of Fire planning area, two communities in the Bay planning area, and one community in the Bering Sea-Western Interior planning area (see draft EIS Table 3.14-6).

Forty-seven communities are central to (i.e., within 25 miles of) 17(d)(1) revocations more likely to be developed in the five planning areas, comprising 16 in the East Alaska planning area, 10 in the Bay planning area, eight in the Ring of Fire planning area, seven in the Kobuk-Seward Peninsula planning area, and five in the Bering Sea-Western Interior planning area (see draft EIS Table 3.14-6).

Table C-5 provides an overall impact ranking for each subsistence focused analysis community based on the quantity of use area acres overlapping lands losing Federal subsistence priority and lands more likely to be developed and based on the distance of these lands from each community. Under Alternative C, communities in the Ring of Fire and East Alaska planning areas have the highest impact rankings. The communities with the highest ranking are the communities of Glennallen, Gulkana, Slana, Mentasta Lake, Talkeetna, Tazlina, and Trapper Creek (see Table C-5). In the other planning areas, communities with the highest impact rankings include Red Devil in the Bering Sea-Western Interior planning area, King Salmon and Aleknagik in the Bay planning area, and Nome in the Kobuk-Seward Peninsula planning area.

**Table C-4. Percentage of Use Areas Overlapping 17(d)(1) Revocations More Likely to Be Developed or Losing Federal Subsistence Priority, Alternative C**

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Ambler	Kobuk-Seward Peninsula	4,736	0.01%	5,606	0.02%
Brevig Mission	Kobuk-Seward Peninsula	8,621	0.23%	14,683	0.39%
Buckland	Kobuk-Seward Peninsula	162	0.00%	3,874	0.05%
Deering	Kobuk-Seward Peninsula	3,200	0.04%	3,667	0.05%
Diomedede	Kobuk-Seward Peninsula	0	0.00%	N/A	N/A
Elim	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Golovin	Kobuk-Seward Peninsula	0	0.00%	813	0.07%
Kiana	Kobuk-Seward Peninsula	4,736	0.03%	30	0.00%
Kivalina	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Kobuk	Kobuk-Seward Peninsula	0	0.00%	1,909	0.01%
Kotzebue	Kobuk-Seward Peninsula	4,755	0.04%	3,697	0.03%
Koyuk	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Noatak	Kobuk-Seward Peninsula	0	0.00%	0	0.00%
Nome	Kobuk-Seward Peninsula	40,354	0.33%	27,846	0.23%
Noorvik	Kobuk-Seward Peninsula	4,736	0.03%	2,693	0.02%
Selawik	Kobuk-Seward Peninsula	0	0.00%	3,667	0.03%
Shaktolik	Kobuk-Seward Peninsula	Yes	Yes	No	No
Shungnak	Kobuk-Seward Peninsula	0	0.00%	5,576	0.02%
Teller	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Wales	Kobuk-Seward Peninsula	647	0.11%	N/A	N/A
White Mountain	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Akiachak	Bering Sea-Western Interior	732	0.01%	994	0.01%

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Akiak	Bering Sea-Western Interior	N/A	N/A	No	No
Aniak	Bering Sea-Western Interior	3,503	0.04%	994	0.01%
Anvik	Bering Sea-Western Interior	No	No	N/A	N/A
Chuathbaluk	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Crooked Creek	Bering Sea-Western Interior	Yes	Yes	Yes	Yes
Galena	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Georgetown	Bering Sea-Western Interior	Yes	Yes	Yes	Yes
Grayling	Bering Sea-Western Interior	No	No	N/A	N/A
Holy Cross	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Huslia	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Lake Minchumina	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Lower Kalskag	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Marshall	Bering Sea-Western Interior	101	0.00%	N/A	N/A
McGrath	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Napaimute	Bering Sea-Western Interior	Yes	Yes	Yes	Yes
Nikolai	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Pilot Station	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Red Devil	Bering Sea-Western Interior	Yes	Yes	Yes	Yes
Russian Mission	Bering Sea-Western Interior	101	0.00%	N/A	N/A
Saint Mary's	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Saint Michael	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Shageluk	Bering Sea-Western Interior	No	No	N/A	N/A
Sleetmute	Bering Sea-Western Interior	N/A	N/A	Yes	Yes
Stebbins	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Stony River	Bering Sea-Western Interior	N/A	N/A	Yes	Yes
Takotna	Bering Sea-Western Interior	Yes	Yes	No	No
Telida	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Tuluksak	Bering Sea-Western Interior	726	0.02%	994	0.02%
Unalakleet	Bering Sea-Western Interior	5,519	0.31%	N/A	N/A
Upper Kalskag	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Aleknagik	Bay	4,000	0.04%	189	0.00%
Clark's Point	Bay	4,003	0.05%	189	0.00%
Dillingham	Bay	4,021	0.03%	189	0.00%
Ekuk	Bay	Yes	Yes	Yes	Yes
Ekwok	Bay	20	0.00%	0	0.00%
Igiugig	Bay	3,860	0.15%	N/A	N/A
Iliamna	Bay	4,035	0.02%	178	0.00%

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
King Salmon	Bay	3,862	0.09%	0	0.00%
Kokhanok	Bay	3,860	0.09%	72	0.00%
Koliganek	Bay	0	0.00%	N/A	N/A
Levelock	Bay	3,844	0.13%	0	0.00%
Manokotak	Bay	160	0.00%	189	0.00%
Naknek	Bay	3,862	0.06%	0	0.00%
New Stuyahok	Bay	3,840	0.04%	0	0.00%
Newhalen	Bay	54	0.00%	1	0.00%
Nondalton	Bay	21	0.00%	1	0.00%
Pedro Bay	Bay	0	0.00%	72	0.01%
Platinum	Bay	160	0.00%	189	0.00%
Pope-Vannoy Landing	Bay	Yes	Yes	Yes	Yes
Port Alsworth	Bay	3,840	0.02%	1	0.00%
Portage Creek	Bay	2,143	0.03%	12	0.00%
South Naknek	Bay	23	0.00%	0	0.00%
Togiak	Bay	160	0.00%	189	0.00%
Twin Hills	Bay	160	0.00%	189	0.00%
Beluga	Ring of Fire	0	0.00%	0	0.00%
Chase	Ring of Fire	3,834	0.16%	1,199	0.05%
Chickaloon	Ring of Fire	9	0.00%	2,328	0.32%
Cooper Landing	Ring of Fire	42	0.00%	568	0.01%
Crown Point	Ring of Fire	Yes	Yes	N/A	N/A
Egegik	Ring of Fire	0	0.00%	0	0.00%
Fox River	Ring of Fire	Yes	Yes	Yes	Yes
Haines	Ring of Fire	0	0.00%	N/A	N/A
Halibut Cove	Ring of Fire	Yes	Yes	Yes	Yes
Happy Valley	Ring of Fire	Yes	Yes	Yes	Yes
Hope	Ring of Fire	0.1	0.00%	82	0.01%
Klukwan	Ring of Fire	0	0.00%	N/A	N/A
Moose Pass	Ring of Fire	Yes	Yes	N/A	N/A
Nanwalek	Ring of Fire	0.1	0.00%	261	0.01%
Nikolaevsk	Ring of Fire	0.4	0.00%	5	0.00%
Ninilchik	Ring of Fire	1	0.00%	147	0.00%
Petersville	Ring of Fire	Yes	Yes	Yes	Yes
Point MacKenzie	Ring of Fire	Yes	Yes	Yes	Yes
Point Possession	Ring of Fire	Yes	Yes	Yes	Yes

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Seldovia	Ring of Fire	1,702	0.05%	815	0.02%
Skwentna	Ring of Fire	23,692	0.53%	1	0.00%
Sunrise	Ring of Fire	Yes	Yes	Yes	Yes
Susitna	Ring of Fire	0	0.00%	1	0.00%
Susitna North	Ring of Fire	Yes	Yes	Yes	Yes
Talkeetna	Ring of Fire	80,892	0.84%	3,541	0.04%
Trapper Creek	Ring of Fire	114,622	1.98%	2,801	0.05%
Tyonek	Ring of Fire	0.04	0.00%	0	0.00%
Whittier	Ring of Fire	185	0.00%	4,820	0.08%
Willow	Ring of Fire	Yes	Yes	Yes	Yes
Anderson	East Alaska	22,170	0.18%	2,442	0.02%
Cantwell	East Alaska	165,054	3.83%	2,441	0.06%
Chistochina	East Alaska	3,604	0.22%	11,701	0.71%
Chitina	East Alaska	2,222	0.15%	6,194	0.42%
Copper Center	East Alaska	47,249	0.84%	52,040	0.92%
Cordova	East Alaska	Yes	Yes	Yes	Yes
Denali Park	East Alaska	32,574	0.83%	2,418	0.06%
Dot Lake	East Alaska	208	0.04%	795	0.14%
Dry Creek	East Alaska	0	0.00%	N/A	N/A
Eureka Roadhouse	East Alaska	Yes	Yes	Yes	Yes
Ferry	East Alaska	14,312	1.00%	410	0.03%
Gakona	East Alaska	35,893	0.95%	14,388	0.38%
Glacier View	East Alaska	712	0.04%	59	0.00%
Glennallen	East Alaska	61,760	1.22%	49,544	0.98%
Gulkana	East Alaska	37,312	1.76%	42,111	1.98%
Healy	East Alaska	149,874	1.52%	2,287	0.02%
Kenny Lake	East Alaska	8,555	0.31%	15,584	0.56%
Lake Louise	East Alaska	3,778	0.33%	4,035	0.35%
Mendeltna	East Alaska	37,130	0.74%	39,571	0.79%
Mentasta Lake	East Alaska	59,515	0.64%	30,839	0.33%
Nabesna	East Alaska	47,015	2.04%	7,627	0.33%
Nelchina	East Alaska	37,426	0.73%	39,571	0.77%
Northway	East Alaska	209	0.01%	3,798	0.15%
Paxson	East Alaska	33,720	1.67%	4,648	0.23%
Silver Springs	East Alaska	Yes	Yes	Yes	Yes
Slana	East Alaska	46,876	2.32%	14,603	0.72%
Tanacross	East Alaska	849	0.03%	13,525	0.53%

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Tatitlek	East Alaska	0	0.00%	0	0.00%
Tazlina	East Alaska	10,298	0.33%	5,803	0.19%
Tetlin	East Alaska	0	0.00%	0	0.00%
Tok	East Alaska	48,650	0.50%	26,621	0.27%
Tolsona	East Alaska	3,103	0.17%	1,100	0.06%
Tonsina	East Alaska	27,813	0.65%	47,310	1.11%
Willow Creek	East Alaska	343	0.30%	54	0.05%

Notes: Communities with yes/no entries do not have available subsistence use area data. Presence/absence of overlap is based on an assumed 50-mile radius of subsistence use around the community.

N/A = Community not within 50 miles/use area not overlapping analysis area.

\*Areas losing Federal subsistence use priority as a result of the decision from the draft EIS are State top filings that are not otherwise encumbered that would immediately become effective selections.

**Table C-5. Overall Community Impact Ranking, ANCSA 17(d)(1) Withdrawals Draft EIS, Alternative C**

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority*		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Glennallen	East Alaska	Adjacent	61,760	Adjacent	49,544	12
Gulkana	East Alaska	Adjacent	37,312	Adjacent	42,111	12
Slana	East Alaska	Adjacent	46,876	Adjacent	14,603	12
Mentasta Lake	East Alaska	Central	59,515	Adjacent	30,839	11
Talkeetna	Ring of Fire	Adjacent	80,892	Adjacent	3,541	11
Tazlina	East Alaska	Adjacent	10,298	Adjacent	5,803	11
Trapper Creek	Ring of Fire	Adjacent	114,622	Adjacent	2,801	11
Cantwell	East Alaska	Central	165,054	Adjacent	2,441	10
Chistochina	East Alaska	Central	3,604	Adjacent	11,701	10
Copper Center	East Alaska	Central	47,249	Central	52,040	10
Gakona	East Alaska	Central	35,893	Central	14,388	10
Kenny Lake	East Alaska	Adjacent	8,555	Central	15,584	10
Mendeltna	East Alaska	Central	37,130	Central	39,571	10
Nelchina	East Alaska	Central	37,426	Central	39,571	10
Nome	Kobuk-Seward Peninsula	Central	40,354	Central	27,846	10
Paxson	East Alaska	Adjacent	33,720	Central	4,648	10
Susitna North	Ring of Fire	Adjacent	Yes	Adjacent	Yes	10
Tonsina	East Alaska	Central	27,813	Central	47,310	10
Denali Park	East Alaska	Central	32,574	Central	2,418	9
King Salmon	Bay	Adjacent	3,862	Adjacent	0.33	9

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority*		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Aleknagik	Bay	Central	4,000	Adjacent	189	8
Chase	Ring of Fire	Central	3,834	Central	1,199	8
Happy Valley	Ring of Fire	Central	Yes	Central	Yes	8
Healy	East Alaska	Central	149,874	Peripheral	2,287	8
Lake Louise	East Alaska	Central	3,778	Central	4,035	8
Nabesna	East Alaska	Central	47,015	Peripheral	7,627	8
Petersville	Ring of Fire	Central	Yes	Central	Yes	8
Point MacKenzie	Ring of Fire	Central	Yes	Central	Yes	8
Red Devil	Bering Sea-Western Interior	Peripheral	Yes	Adjacent	Yes	8
Silver Springs	East Alaska	Central	Yes	Central	Yes	8
Tok	East Alaska	Peripheral	48,650	Peripheral	26,621	8
Tolsona	East Alaska	Central	3,103	Central	1,100	8
Whittier	Ring of Fire	Peripheral	Yes	Peripheral	Yes	8
Ambler	Kobuk-Seward Peninsula	Peripheral	4,736	Central	5,606	7
Anderson	East Alaska	Peripheral	22,170	Peripheral	2,442	7
Aniak	Bering Sea-Western Interior	Adjacent	3,503	Peripheral	994	7
Brevig Mission	Kobuk-Seward Peninsula	Peripheral	8,621	Peripheral	14,683	7
Chickaloon	Ring of Fire	Central	9	Central	2,328	7
Chitina	East Alaska	Central	2,222	Peripheral	6,194	7
Crooked Creek	Bering Sea-Western Interior	Peripheral	Yes	Central	Yes	7
Elim	Kobuk-Seward Peninsula	Peripheral	Yes	Central	Yes	7
Eureka Roadhouse	East Alaska	Peripheral	Yes	Central	Yes	7
Georgetown	Bering Sea-Western Interior	Peripheral	Yes	Central	Yes	7
Glacier View	East Alaska	Central	7,177	Central	59	7
Iliamna	Bay	Central	4,035	Central	178	7
Kokhanok	Bay	Adjacent	3,860	Peripheral	72	7
Koyuk	Kobuk-Seward Peninsula	Peripheral	Yes	Central	Yes	7
Naknek	Bay	Central	3,862	Central	0.33	7
Napaimute	Bering Sea-Western Interior	Central	Yes	Peripheral	Yes	7
Pope-Vannoy Landing	Bay	Central	Yes	Peripheral	Yes	7
Sunrise	Ring of Fire	Central	Yes	Peripheral	Yes	7
White Mountain	Kobuk-Seward Peninsula	Peripheral	Yes	Central	Yes	7
Willow	Ring of Fire	Adjacent	185	Adjacent	4,820	7
Buckland	Kobuk-Seward Peninsula	Peripheral	162	Central	3,874	6
Clark's Point	Bay	Peripheral	4,003	Central	189	6



Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority*		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Cordova	East Alaska	Peripheral	Yes	Peripheral	Yes	6
Deering	Kobuk-Seward Peninsula	Peripheral	3,200	Peripheral	3,667	6
Dillingham	Bay	Peripheral	4,021	Central	189	6
Ekuk	Bay	Peripheral	Yes	Peripheral	Yes	6
Ferry	East Alaska	Peripheral	14,312	Peripheral	410	6
Fox River	Ring of Fire	Peripheral	Yes	Peripheral	Yes	6
Halibut Cove	Ring of Fire	Peripheral	Yes	Peripheral	Yes	6
Kotzebue	Kobuk-Seward Peninsula	Peripheral	4,755	Peripheral	3,697	6
McGrath	Bering Sea-Western Interior	Central	Yes	Central	0	6
Newhalen	Bay	Central	54	Central	1	6
Nikolaevsk	Ring of Fire	Central	0	Central	5	6
Ninilchik	Ring of Fire	Central	1	Central	147	6
Noorvik	Kobuk-Seward Peninsula	Peripheral	4,736	Peripheral	2,693	6
Point Possession	Ring of Fire	Peripheral	Yes	Peripheral	Yes	6
Port Alsworth	Bay	Peripheral	3,840	Central	1	6
Skwentna	Ring of Fire	Peripheral	23,692	Peripheral	1	6
South Naknek	Bay	Central	23	Central	0.33	6
Susitna	Ring of Fire	Central	0	Adjacent	1	6
Tanacross	East Alaska	Peripheral	849	Peripheral	13,525	6
Teller	Kobuk-Seward Peninsula	Peripheral	Yes	Peripheral	Yes	6
Upper Kalskag	Bering Sea-Western Interior	Central	Yes	Central	0	6
Willow Creek	East Alaska	Central	343	Central	54	6
Hope	Ring of Fire	Central	0	Peripheral	82	5
Kiana	Kobuk-Seward Peninsula	Peripheral	4,736	Peripheral	30	5
Levelock	Bay	Central	3,844	Peripheral	0	5
Manokotak	Bay	Peripheral	160	Central	189	5
Nondalton	Bay	Peripheral	21	Central	1	5
Northway	East Alaska	Peripheral	209	Peripheral	3,798	5
Portage Creek	Bay	Peripheral	2,143	Peripheral	12	5
Seldovia	Ring of Fire	Peripheral	1,702	Peripheral	815	5
Sleetmute	Bering Sea-Western Interior	Peripheral	0	Central	Yes	5
Akiachak	Bering Sea-Western Interior	Peripheral	732	Peripheral	994	4
Chuathbaluk	Bering Sea-Western Interior	Central	Yes	None	0	4
Cooper Landing	Ring of Fire	Peripheral	42	Peripheral	568	4
Dot Lake	East Alaska	Peripheral	208	Peripheral	795	4
Ekwok	Bay	Peripheral	20	Peripheral	0.33	4

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority*		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Igiugig	Bay	Central	3,860	None	0	4
Klukwan	Ring of Fire	Central	0	Central	0	4
Lower Kalskag	Bering Sea-Western Interior	Central	Yes	None	0	4
Nanwalek	Ring of Fire	Peripheral	0	Peripheral	261	4
New Stuyahok	Bay	Peripheral	3,840	Peripheral	0	4
Platinum	Bay	Peripheral	160	Peripheral	189	4
Saint Michael	Bering Sea-Western Interior	Central	Yes	None	0	4
Shaktoolik	Kobuk-Seward Peninsula	Central	Yes	None	0	4
Stebbins	Bering Sea-Western Interior	Central	Yes	None	0	4
Stony River	Bering Sea-Western Interior	None	0	Central	Yes	4
Takotna	Bering Sea-Western Interior	Central	Yes	None	0	4
Togiak	Bay	Peripheral	160	Peripheral	189	4
Tuluksak	Bering Sea-Western Interior	Peripheral	726	Peripheral	994	4
Twin Hills	Bay	Peripheral	160	Peripheral	189	4
Tyonek	Ring of Fire	Peripheral	0.04	Peripheral	0.04	4
Unalakleet	Bering Sea-Western Interior	Central	5,519	None	0	4
Wales	Kobuk-Seward Peninsula	Adjacent	647	None	0	4
Beluga	Ring of Fire	Peripheral	0	Peripheral	0.46	3
Crown Point	Ring of Fire	Peripheral	Yes	None	0	3
Golovin	Kobuk-Seward Peninsula	None	0	Central	813	3
Holy Cross	Bering Sea-Western Interior	Peripheral	Yes	None	0	3
Kobuk	Kobuk-Seward Peninsula	None	0	Peripheral	1,909	3
Lake Minchumina	Bering Sea-Western Interior	Adjacent	0	None	0	3
Marshall	Bering Sea-Western Interior	Central	101	None	0	3
Moose Pass	Ring of Fire	Peripheral	Yes	None	0	3
Pedro Bay	Bay	None	0	Central	72	3
Pilot Station	Bering Sea-Western Interior	Peripheral	Yes	None	0	3
Russian Mission	Bering Sea-Western Interior	Central	101	None	0	3
Saint Mary's	Bering Sea-Western Interior	Peripheral	Yes	None	0	3
Shungnak	Kobuk-Seward Peninsula	None	0	Peripheral	5,576	3
Tatitlek	East Alaska	Peripheral	0	Central	0	3
Tetlin	East Alaska	Peripheral	0	Central	0	3
Egegik	Ring of Fire	Peripheral	0	Peripheral	0	2
Haines	Ring of Fire	Central	0	None	0	2
Selawik	Kobuk-Seward Peninsula	None	0	Peripheral	3,667	2
Diomede	Kobuk-Seward Peninsula	Peripheral	0	None	0	1

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority*		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Dry Creek	East Alaska	Peripheral	0	None	0	1
Huslia	Bering Sea-Western Interior	None	0	Peripheral	0	1
Koliganek	Bay	Peripheral	0	None	0	1
Noatak	Kobuk-Seward Peninsula	Peripheral	0	None	0	1
Telida	Bering Sea-Western Interior	Peripheral	0	None	0	1
Akiak	Bering Sea-Western Interior	None	0	None	0	0
Anvik	Bering Sea-Western Interior	None	0	None	0	0
Galena	Bering Sea-Western Interior	None	0	None	0	0
Grayling	Bering Sea-Western Interior	None	0	None	0	0
Kivalina	Kobuk-Seward Peninsula	None	0	None	0	0
Nikolai	Bering Sea-Western Interior	None	0	None	0	0
Shageluk	Bering Sea-Western Interior	None	0	None	0	0

Notes:

Distance from Community categorized as follows:

None (no color) = No subsistence use area overlap with 17(d)(1) revocations, or (if use area data not available), community more than 50 miles from 17(d)(1) revocations.

Peripheral (yellow) = Community over 25 miles from 17(d)(1) revocations.

Central (orange) = Community between 5 and 25 miles from 17(d)(1) revocations.

Adjacent (red) = Community within 5 miles of 17(d)(1) revocations.

Acreage categorized as follows:

0 = None

Yes (gray) = Assumed overlap based on 50-mile radius from community.

Low (yellow) = < 1,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

Medium (orange) = between 1,000 and 10,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

High (red) = > 10,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

Impact ranking (calculated by summing the values for each community) categorized as follows:

None (no color) = zero

Peripheral/less than 1,000 acres (yellow) = 1

Central/between 1,000 and 10,000 acres/"yes" (orange) = 2

Adjacent/over 10,000 acres (red) = 3

\* Areas losing Federal subsistence use priority as a result of the decision from the draft EIS are State top filings that are not otherwise encumbered that would immediately become effective selections.

## Evaluation of the Availability of Other Lands

ANCSA 17(d)(1) withdrawals were originally withdrawn in 1972–1973 pursuant to ANCSA. The purpose sought to be achieved by the BLM is to review the revocation of 17(d)(1) withdrawals as indicated in PLOs 7899 through 7903, and to provide for the orderly management of the public lands in the decision area in a way that is consistent with the purposes of the 17(d)(1) withdrawals to ensure “the public interest in these lands is properly protected.” For Alternative C specifically, the purpose of this alternative would be to provide for the development of lands with high mineral potential and to provide the State with all of their Priority 1 and 2 top filings so that they can complete their selections and fulfill their entitlements under ANCSA. This alternative revokes all 17(d)(1) withdrawals within lands in the decision area of high mineral potential and revokes the withdrawals in part to allow for Alaska Statehood Act selection for all remaining State Priority 1 and 2 top filings. There are no other available lands within the evaluation area with high mineral potential or that would open the State’s most desirable lands.

## ***Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes***

Alternative C both revokes in full and in part 17(d)(1) withdrawals to allow for State top filed selections to fall into place and to provide for the selection and disposition of lands that have a high potential for development. The amount of land the State can receive is defined by the Alaska Statehood Act, and no actions taken by the BLM can reduce or eliminate that disposition of the public lands. The only other alternatives considered are to not revoke the 17(d)(1) withdrawals (Alternative A) or to only revoke in part State Priority 1 and 2 top filed lands (Alternative B).

### ***Findings***

Because Alternative C does not take resource conflict concerns into consideration (as Alternative B does) and revokes withdrawals on additional lands with high mineral potential, this alternative would increase the potential for direct impacts to subsistence access. Primary impacts on subsistence user access, resource abundance, and resource availability would result from a change in subsistence management (i.e., loss of Federal subsistence priority) or an increase in the potential for development.

This evaluation concludes that Alternative C may result in significant restriction to subsistence uses affecting user access for 111 rural communities that overlap or are adjacent to withdrawals. Subsistence user access for those communities would be affected due to a loss of Federal subsistence priority, resulting in an increase in competition for subsistence resources from non-rural, Federally non-qualified hunters. See Table C-6 for a list of the analyzed communities where this action may significantly restrict subsistence uses and where it would not significantly restrict subsistence uses due to loss of Federal subsistence priority.

In addition, revocation of withdrawals under Alternative C may result in unselected Federal lands becoming open to mineral entry and leasing causing an increase potential for resource development that may result in significant restriction to subsistence uses affecting user access and resource abundance and availability for 91 rural communities that are peripheral, adjacent, or central to withdrawals. This evaluation assumes that the potential for ROWs, mineral exploration and development, and other development projects would increase when the lands are conveyed to the State, especially in areas identified as more likely to be developed. See Table C-6 for a list of the analyzed communities where this action may significantly restrict subsistence uses and where it would not significantly restrict subsistence uses due to opening lands to mineral extraction in areas likely to be developed.

**Table C-6. Summary of Findings, Alternative C**

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Akiachak	X		X	
Akiak		X		X
Aleknagik	X		X	
Ambler	X		X	

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Anderson	X		X	
Aniak	X		X	
Anvik		X		X
Beluga		X		X
Brevig Mission	X		X	
Buckland	X		X	
Cantwell	X		X	
Chase	X		X	
Chickaloon	X		X	
Chistochina	X		X	
Chitina	X		X	
Chuathbaluk	X			X
Clark's Point	X		X	
Cooper Landing	X		X	
Copper Center	X		X	
Cordova	X		X	
Crooked Creek	X		X	
Crown Point	X			X
Deering	X		X	
Denali Park	X		X	
Dillingham	X		X	
Diomedede		X		X
Dot Lake	X		X	
Dry Creek		X		X
Egegik		X		X
Ekuk	X		X	
Ekwok	X			X
Elim	X		X	
Eureka Roadhouse	X		X	
Ferry	X		X	
Fox River	X		X	
Gakona	X		X	
Galena		X		X
Georgetown	X		X	
Glacier View	X		X	
Glennallen	X		X	

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Golovin		X	X	
Grayling		X		X
Gulkana	X		X	
Haines		X		X
Halibut Cove	X		X	
Happy Valley	X		X	
Healy	X		X	
Holy Cross	X			X
Hope	X		X	
Huslia		X		X
Igiugig	X			X
Iliamna	X		X	
Kenny Lake	X		X	
Kiana	X		X	
King Salmon	X			X
Kivalina		X		X
Klukwan		X		X
Kobuk		X	X	
Kokhanok	X		X	
Koliganek		X		X
Kotzebue	X		X	
Koyuk	X		X	
Lake Louise	X		X	
Lake Minchumina		X		X
Levelock	X			X
Lower Kalskag	X			X
Manokotak	X		X	X
Marshall	X			X
McGrath	X			X
Mendeltna	X		X	X
Mentasta Lake	X		X	
Moose Pass	X			X
Nabesna	X		X	X
Naknek	X			X
Nanwalek	X		X	
Napaimute	X		X	

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Nelchina	X		X	
New Stuyahok	X			X
Newhalen	X		X	
Nikolaevsk	X		X	
Nikolai		X		X
Ninilchik	X		X	
Noatak		X		X
Nome	X		X	
Nondalton	X		X	
Noorvik	X		X	
Northway	X		X	
Paxson	X		X	
Pedro Bay		X	X	
Petersville	X		X	
Pilot Station	X			X
Platinum	X		X	
Point MacKenzie	X		X	
Point Possession	X		X	
Pope-Vannoy Landing	X		X	
Port Alsworth	X		X	
Portage Creek	X		X	
Red Devil	X		X	
Russian Mission	X			X
Saint Mary's	X			X
Saint Michael	X			X
Selawik		X	X	
Seldovia	X		X	
Shageluk		X		X
Shaktolik	X			X
Shungnak		X	X	
Silver Springs	X		X	
Skwentna	X		X	
Slana	X		X	
Sleetmute		X	X	
South Naknek	X			X
Stebbins	X			X

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Stony River		X	X	
Sunrise	X		X	
Susitna		X	X	
Susitna North	X		X	
Takotna	X			X
Talkeetna	X		X	
Tanacross	X		X	
Tatitlek		X		X
Tazlina	X		X	
Telida		X		X
Teller	X		X	
Tetlin		X		X
Togiak	X		X	
Tok	X		X	
Tolsona	X		X	
Tonsina	X		X	
Trapper Creek	X		X	
Tuluksak	X		X	
Twin Hills	X		X	
Tyonek	X			X
Unalakleet	X			X
Upper Kalskag	X			X
Wales	X			X
White Mountain	X		X	
Whittier	X		X	
Willow	X		X	
Willow Creek	X		X	

## Evaluation and Findings for Alternative D (2021 Proposed Action)

Under Alternative D, all 17(d)(1) withdrawals would be revoked. No lands would remain withdrawn. Similar to Alternative C, Alternative D would revoke withdrawals on State top filed lands that have been identified as having conflicts with subsistence, in addition to revoking withdrawals on additional lands with high mineral potential. Federal subsistence priority would no longer apply to approximately 343,000 acres of land that would become effective selections upon revocation of 17(d)(1) withdrawals. Approximately 342,000 acres are Priority 3 and 4 top filed lands, which would be rejected or relinquished



within 10 years of the revocation due to overselection; thus, the Federal subsistence priority would apply again. This alternative would increase the potential for direct impacts to subsistence access. Primary impacts on subsistence user access, resource abundance, and resource availability would result from a change in subsistence management (i.e., loss of Federal subsistence priority) or an increase in the potential for development, and are discussed under Alternative B. Differences under Alternative D are discussed below.

### ***Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need***

Under Alternative D, all 27,735,000 acres of current 17(d)(1) withdrawals would be revoked in full. As with Alternatives B and C, when lands are conveyed to the State, the land would lose Federal management. Because of the larger number of 17(d)(1) revocations, Alternative D would have the greatest potential for changes in management and therefore the greatest potential for direct impacts on subsistence user access.

Under Alternative D, 117 of the 139 analysis communities have subsistence use areas overlapping 17(d)(1) withdrawals that would lose Federal subsistence priority, compared to 70 analysis communities under Alternative B and 111 communities under Alternative C (see Tables C-1, C-4, and C-7). This analysis includes lands where there would be a permanent loss of Federal subsistence priority in addition to lands where there would be a temporary loss of Federal subsistence priority (i.e., State Priority 3 and 4 top filed lands that are eventually relinquished). As discussed under Alternative C, even a temporary loss of Federal subsistence priority could have longer term effects on subsistence uses because local subsistence users may quickly alter land use patterns in response to changes in land management. Because both Alternatives C and D revoke withdrawals on all Priority 1 and 2 lands, any differences between these alternatives in terms of loss of Federal subsistence priority are due to the revocation of additional Priority 3 and 4 lands and therefore reflect a temporary loss of Federal subsistence priority.

The planning area with the greatest number of communities potentially affected under Alternative D in terms of a loss of Federal subsistence priority is the East Alaska (29 communities) planning area, followed by the Ring of Fire (21 communities), Bering Sea-Western Interior (25 communities), Bay (23 communities), and Kobuk-Seward Peninsula (19 communities) planning areas. Similar to Alternative C, the communities with the greatest acreage of use areas where there would be a loss of Federal subsistence priority are located in the East Alaska and Ring of Fire planning areas and include Cantwell, Healy, and Trapper Creek (Table C-7). Twenty-four communities, comprising 18 in the East Alaska planning area, three in the Ring of Fire planning area, two in the Kobuk-Seward Peninsula planning area, and one in the Bering Sea-Western Interior planning area, would lose Federal subsistence priority on at least 10,000 acres of documented subsistence use areas (Table C-7). Based on available data, communities losing the highest percentage of use areas that currently have Federal subsistence priority are the same as under Alternative C and include Glacier View, Chickaloon, Ferry, Cantwell, Trapper Creek, Healy, Tolsona, and Paxson. Under Alternative D, 18 communities would lose Federal subsistence priority in some areas adjacent to (i.e., within 5 miles of) their community, comprising seven communities in East Alaska, four each in the Ring of Fire and Bering Sea-Western Interior planning areas, and two each in the Bay and Kobuk-Seward Peninsula planning areas (see draft EIS Table 3.14-6).

Also under Alternative D, 119 of the 139 focused analysis area communities have subsistence use areas overlapping lands more likely to be developed compared to 91 under Alternative C and 55 under Alternative B (see Tables C-1, C-4, and C-7). The planning area with the greatest number of communities potentially affected under Alternative D in terms of an increase in development is the East Alaska (29 communities) planning area, followed by the Ring of Fire (21 communities), Bay (23 communities),

Kobuk-Seward Peninsula (19 communities), and Bering Sea-Western Interior (25 communities) planning areas.

Twenty-two individual communities have more than 20,000 acres of 17(d)(1) revocations with lands more likely to be developed under Alternative D (Table C-7). Under Alternative D, 17 communities are adjacent to (i.e., within 5 miles of) 17(d)(1) revocations more likely to be developed, comprising seven communities in the East Alaska planning area, five communities in the Ring of Fire planning area, three communities in the Bay planning area, and one community each in the Bering Sea-Western Interior and Kobuk-Seward Peninsula planning areas (see draft EIS Table 3.14-6). Forty-six communities are central to (i.e., within 25 miles of) 17(d)(1) revocations more likely to be developed in the five planning areas (see draft EIS Table 3.14-6). These communities are the most likely to experience impacts from an increase in development activities and infrastructure under Alternative D.

Table C-8 provides an overall impact ranking for each analysis community based on the quantity of use area acres overlapping lands losing Federal subsistence priority and lands more likely to be developed and based on and the distance of these lands from each community. Under Alternative D, the East Alaska planning area has the only communities with an impact ranking of 12. These communities are Glennallen, Gulkana, and Slana. Trapper Creek and Talkeetna in the Ring of Fire planning area and Mentasta Lake in the East Alaska planning area have impact rankings of 11 (see Table C-8). In the other planning areas, similar to Alternative C, communities with the highest impact rankings include Aniak and Red Devil (Bering Sea-Western Interior), Aleknagik and King Salmon (Bay), and Nome and Noatak (Kobuk-Seward Peninsula).

**Table C-7. Percentage of Use Areas Overlapping 17(d)(1) Revocations More Likely to Be Developed or Losing Federal Subsistence Priority, Alternative D**

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Ambler	Kobuk-Seward Peninsula	4,881	0.02%	9,511	0.03%
Brevig Mission	Kobuk-Seward Peninsula	20,253	0.54%	20,676	0.55%
Buckland	Kobuk-Seward Peninsula	3,145	0.04%	4,593	0.06%
Deering	Kobuk-Seward Peninsula	6,183	0.08%	4,385	0.05%
Diomedes	Kobuk-Seward Peninsula	0	0.00%	N/A	N/A
Elim	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Golovin	Kobuk-Seward Peninsula	0	0.00%	813	0.07%
Kiana	Kobuk-Seward Peninsula	4,736	0.03%	30	0.00%
Kivalina	Kobuk-Seward Peninsula	2,983	0.03%	15,666	0.14%
Kobuk	Kobuk-Seward Peninsula	145	0.00%	5,095	0.03%
Kotzebue	Kobuk-Seward Peninsula	5,069	0.04%	4,416	0.03%
Koyuk	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Noatak	Kobuk-Seward Peninsula	2,983	0.01%	15,666	0.07%
Nome	Kobuk-Seward Peninsula	53,875	0.44%	33,841	0.28%
Noorvik	Kobuk-Seward Peninsula	4,881	0.03%	18,095	0.12%
Selawik	Kobuk-Seward Peninsula	145	0.00%	4,385	0.04%

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Shaktoolik	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Shungnak	Kobuk-Seward Peninsula	145	0.00%	9,480	0.04%
Teller	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Wales	Kobuk-Seward Peninsula	647	0.11%	N/A	N/A
White Mountain	Kobuk-Seward Peninsula	Yes	Yes	Yes	Yes
Akiachak	Bering Sea-Western Interior	6,989	0.08%	994	0.01%
Akiak	Bering Sea-Western Interior	N/A	N/A	No	No
Aniak	Bering Sea-Western Interior	40,619	0.51%	1,050	0.01%
Anvik	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Chuathbaluk	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Crooked Creek	Bering Sea-Western Interior	Yes	Yes	Yes	Yes
Galena	Bering Sea-Western Interior	15	0.00%	N/A	N/A
Georgetown	Bering Sea-Western Interior	Yes	Yes	Yes	Yes
Grayling	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Holy Cross	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Huslia	Bering Sea-Western Interior	145	0.00%	N/A	N/A
Lake Minchumina	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Lower Kalskag	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Marshall	Bering Sea-Western Interior	1,903	0.08%	N/A	N/A
McGrath	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Napaimute	Bering Sea-Western Interior	Yes	Yes	Yes	Yes
Nikolai	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Pilot Station	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Red Devil	Bering Sea-Western Interior	Yes	Yes	Yes	Yes
Russian Mission	Bering Sea-Western Interior	1,892	0.04%	N/A	N/A
Saint Mary's	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Saint Michael	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Shageluk	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Sleetmute	Bering Sea-Western Interior	N/A	N/A	Yes	Yes
Stebbins	Bering Sea-Western Interior	Yes	Yes	N/A	N/A
Stony River	Bering Sea-Western Interior	N/A	N/A	Yes	Yes
Takotna	Bering Sea-Western Interior	Yes	Yes	No	No
Telida	Bering Sea-Western Interior	0	0.00%	N/A	N/A
Tuluksak	Bering Sea-Western Interior	804	0.02%	994	0.02%
Unalakleet	Bering Sea-Western Interior	6,390	0.36%	N/A	N/A
Upper Kalskag	Bering Sea-Western Interior	Yes	Yes	N/A	N/A

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Aleknagik	Bay	4,000	0.04%	1,720	0.02%
Clark's Point	Bay	4,005	0.05%	239	0.00%
Dillingham	Bay	4,021	0.03%	1,452	0.01%
Ekuk	Bay	Yes	Yes	Yes	Yes
Ekwok	Bay	22	0.00%	28	0.00%
Igiugig	Bay	3,860	0.15%	N/A	N/A
Iliamna	Bay	4,696	0.03%	2,059	0.01%
King Salmon	Bay	3,865	0.09%	28	0.00%
Kokhanok	Bay	3,860	0.09%	690	0.02%
Koliganek	Bay	0	0.00%	N/A	N/A
Levelock	Bay	3,844	0.13%	0	0.00%
Manokotak	Bay	160	0.00%	211	0.00%
Naknek	Bay	3,865	0.06%	28	0.00%
New Stuyahok	Bay	3,840	0.04%	1,866	0.02%
Newhalen	Bay	715	0.02%	1,860	0.05%
Nondalton	Bay	681	0.02%	1,860	0.04%
Pedro Bay	Bay	661	0.06%	72	0.01%
Platinum	Bay	160	0.00%	211	0.00%
Pope-Vannoy Landing	Bay	Yes	Yes	Yes	Yes
Port Alsworth	Bay	4,500	0.03%	1,860	0.01%
Portage Creek	Bay	2,143	0.03%	34	0.00%
South Naknek	Bay	25	0.00%	28	0.00%
Togiak	Bay	160	0.00%	211	0.00%
Twin Hills	Bay	160	0.00%	211	0.00%
Beluga	Ring of Fire	0	0.00%	0	0.00%
Chase	Ring of Fire	4,325	0.18%	5,082	0.21%
Chickaloon	Ring of Fire	17	0.00%	2,341	0.32%
Cooper Landing	Ring of Fire	42	0.00%	581	0.01%
Crown Point	Ring of Fire	Yes	Yes	N/A	N/A
Egegik	Ring of Fire	0	0.00%	0	0.00%
Fox River	Ring of Fire	Yes	Yes	Yes	Yes
Haines	Ring of Fire	0	0.00%	N/A	N/A
Halibut Cove	Ring of Fire	Yes	Yes	Yes	Yes
Happy Valley	Ring of Fire	Yes	Yes	Yes	Yes
Hope	Ring of Fire	0	0.00%	83	0.01%
Klukwan	Ring of Fire	4	0.00%	N/A	N/A

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Moose Pass	Ring of Fire	Yes	Yes	N/A	N/A
Nanwalek	Ring of Fire	0	0.00%	272	0.01%
Nikolaevsk	Ring of Fire	0	0.00%	5	0.00%
Ninilchik	Ring of Fire	1	0.00%	159	0.00%
Petersville	Ring of Fire	Yes	Yes	Yes	Yes
Point MacKenzie	Ring of Fire	Yes	Yes	Yes	Yes
Point Possession	Ring of Fire	Yes	Yes	Yes	Yes
Seldovia	Ring of Fire	1,702	0.05%	815	0.02%
Skwentna	Ring of Fire	23,692	0.53%	1	0.00%
Sunrise	Ring of Fire	Yes	Yes	Yes	Yes
Susitna	Ring of Fire	0	0.00%	1	0.00%
Susitna North	Ring of Fire	Yes	Yes	Yes	Yes
Talkeetna	Ring of Fire	80,892	0.84%	14,973	0.15%
Trapper Creek	Ring of Fire	114,622	1.98%	5,703	0.10%
Tyonek	Ring of Fire	0	0.00%	0	0.00%
Whittier	Ring of Fire	258	0.00%	4,915	0.08%
Willow	Ring of Fire	Yes	Yes	Yes	Yes
Anderson	East Alaska	22,196	0.18%	4,103	0.03%
Cantwell	East Alaska	165,545	3.84%	6,330	0.15%
Chistochina	East Alaska	3,604	0.22%	11,737	0.71%
Chitina	East Alaska	2,222	0.15%	7,067	0.48%
Copper Center	East Alaska	47,323	0.84%	62,530	1.11%
Cordova	East Alaska	Yes	Yes	Yes	Yes
Denali Park	East Alaska	32,574	0.83%	6,306	0.16%
Dot Lake	East Alaska	208	0.04%	795	0.14%
Dry Creek	East Alaska	0	0.00%	N/A	N/A
Eureka Roadhouse	East Alaska	Yes	Yes	Yes	Yes
Ferry	East Alaska	14,312	1.00%	410	0.03%
Gakona	East Alaska	35,894	0.95%	24,681	0.65%
Glacier View	East Alaska	836	0.05%	114	0.01%
Glennallen	East Alaska	61,833	1.22%	56,185	1.11%
Gulkana	East Alaska	37,312	1.76%	52,505	2.47%
Healy	East Alaska	150,124	1.52%	6,175	0.06%
Kenny Lake	East Alaska	8,557	0.31%	16,555	0.60%
Lake Louise	East Alaska	3,778	0.33%	13,599	1.18%
Mendeltna	East Alaska	37,203	0.74%	50,062	1.00%

Analysis Community	Planning Area	Acres of Use Areas Overlapping Revoked Parcels, Areas Losing Federal Subsistence Priority*		Acres of Use Areas Overlapping Revoked Parcels, Areas Likely to be Developed	
		No.	%	No.	%
Mentasta Lake	East Alaska	59,515	0.64%	31,001	0.34%
Nabesna	East Alaska	47,015	2.04%	7,627	0.33%
Nelchina	East Alaska	37,499	0.73%	50,062	0.98%
Northway	East Alaska	209	0.01%	3,798	0.15%
Paxson	East Alaska	33,720	1.67%	6,890	0.34%
Silver Springs	East Alaska	Yes	Yes	Yes	Yes
Slana	East Alaska	46,876	2.32%	14,603	0.72%
Tanacross	East Alaska	849	0.03%	13,525	0.53%
Tatitlek	East Alaska	0	0.00%	0	0.00%
Tazlina	East Alaska	10,298	0.33%	6,036	0.19%
Tetlin	East Alaska	0	0.00%	0	0.00%
Tok	East Alaska	48,650	0.50%	26,781	0.28%
Tolsona	East Alaska	3,103	0.17%	1,101	0.06%
Tonsina	East Alaska	27,813	0.65%	57,646	1.35%
Willow Creek	East Alaska	343	0.30%	54	0.05%

Notes: Communities with yes/no entries do not have available subsistence use area data. Presence/absence of overlap is based on an assumed 50 mile radius of subsistence use around the community.

N/A = Community not within 50 miles/use area not overlapping analysis area.

\*Areas losing Federal subsistence use priority as a result of the decision from this draft EIS are State top filings that are not otherwise encumbered that would immediately become effective selections.

**Table C-8. Overall Community Impact Ranking, ANCSA 17(d)(1) Withdrawals Draft EIS, Alternative D**

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Glennallen	East Alaska	Adjacent	61,833	Adjacent	56,185	12
Gulkana	East Alaska	Adjacent	37,312	Adjacent	52,505	12
Slana	East Alaska	Adjacent	46,876	Adjacent	14,603	12
Mentasta Lake	East Alaska	Central	59,515	Adjacent	31,001	11
Talkeetna	Ring of Fire	Adjacent	80,892	Central	14,973	11
Trapper Creek	Ring of Fire	Adjacent	114,622	Adjacent	5,703	11
Cantwell	East Alaska	Central	165,545	Adjacent	6,330	10
Chistochina	East Alaska	Central	3,604	Adjacent	11,737	10
Copper Center	East Alaska	Central	47,323	Central	62,530	10
Gakona	East Alaska	Central	35,894	Central	24,681	10
Kenny Lake	East Alaska	Adjacent	8,557	Central	16,555	10

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Mendeltna	East Alaska	Central	37,203	Central	50,062	10
Nelchina	East Alaska	Central	37,499	Central	50,062	10
Nome	Kobuk-Seward Peninsula	Central	53,875	Central	33,841	10
Paxson	East Alaska	Adjacent	33,720	Central	6,890	10
Susitna North	Ring of Fire	Adjacent	Yes	Adjacent	Yes	10
Tazlina	East Alaska	Adjacent	10,298	Central	6,036	10
Tonsina	East Alaska	Central	27,813	Central	57,646	10
Willow	Ring of Fire	Adjacent	Yes	Adjacent	Yes	10
Aleknagik	Bay	Central	4,000	Adjacent	1,720	9
Aniak	Bering Sea-Western Interior	Adjacent	40,619	Peripheral	1,050	9
Denali Park	East Alaska	Central	32,574	Central	6,306	9
King Salmon	Bay	Adjacent	3,865	Adjacent	28	9
Lake Louise	East Alaska	Central	3,778	Central	13,599	9
Noatak	Kobuk-Seward Peninsula	Adjacent	2,983	Peripheral	15,666	9
Brevig Mission	Kobuk-Seward Peninsula	Peripheral	20,253	Peripheral	20,676	8
Chase	Ring of Fire	Central	4,325	Central	5,082	8
Elim	Kobuk-Seward Peninsula	Central	Yes	Central	Yes	8
Eureka Roadhouse	East Alaska	Central	Yes	Central	Yes	8
Happy Valley	Ring of Fire	Central	Yes	Central	Yes	8
Healy	East Alaska	Central	150,124	Peripheral	6,175	8
Iliamna	Bay	Central	4,696	Central	2,059	8
Koyuk	Kobuk-Seward Peninsula	Peripheral	Yes	Adjacent	Yes	8
Nabesna	East Alaska	Central	47,015	Peripheral	7,627	8
Nondalton	Bay	Central	681	Adjacent	1,860	8
Petersville	Ring of Fire	Central	Yes	Central	Yes	8
Point MacKenzie	Ring of Fire	Central	Yes	Central	Yes	8
Pope-Vannoy Landing	Bay	Central	Yes	Central	Yes	8
Port Alsworth	Bay	Central	4,500	Central	1,860	8
Red Devil	Bering Sea-Western Interior	Peripheral	Yes	Adjacent	Yes	8
Silver Springs	East Alaska	Central	Yes	Central	Yes	8
Tanacross	East Alaska	Peripheral	849	Adjacent	13,525	8
Tok	East Alaska	Peripheral	48,650	Peripheral	26,781	8
White Mountain	Kobuk-Seward Peninsula	Central	Yes	Central	Yes	8
Ambler	Kobuk-Seward Peninsula	Peripheral	4,881	Central	9,511	7
Anderson	East Alaska	Peripheral	22,196	Peripheral	4,103	7

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Buckland	Kobuk-Seward Peninsula	Peripheral	3,145	Central	4,593	7
Chickaloon	Ring of Fire	Central	26	Central	2,341	7
Chitina	East Alaska	Central	2,222	Peripheral	7,067	7
Crooked Creek	Bering Sea-Western Interior	Peripheral	Yes	Central	Yes	7
Dillingham	Bay	Peripheral	4,021	Central	1,452	7
Fox River	Ring of Fire	Peripheral	Yes	Central	Yes	7
Georgetown	Bering Sea-Western Interior	Peripheral	Yes	Central	Yes	7
Glacier View	East Alaska	Central	7,250	Central	114	7
Kivalina	Kobuk-Seward Peninsula	Peripheral	2,983	Peripheral	15,666	7
Kokhanok	Bay	Adjacent	3,860	Peripheral	690	7
Naknek	Bay	Central	3,865	Central	28	7
Napaimute	Bering Sea-Western Interior	Central	Yes	Peripheral	Yes	7
Newhalen	Bay	Central	715	Central	1,860	7
Noorvik	Kobuk-Seward Peninsula	Peripheral	4,881	Peripheral	18,095	7
Shaktoolik	Kobuk-Seward Peninsula	Central	Yes	Peripheral	Yes	7
Sunrise	Ring of Fire	Central	Yes	Peripheral	Yes	7
Tolsona	East Alaska	Central	3,103	Peripheral	1,101	7
Willow Creek	East Alaska	Adjacent	343	Central	54	7
Clark's Point	Bay	Peripheral	4,005	Central	239	6
Cordova	East Alaska	Peripheral	Yes	Peripheral	Yes	6
Deering	Kobuk-Seward Peninsula	Peripheral	6,183	Peripheral	4,385	6
Ekuk	Bay	Peripheral	Yes	Peripheral	Yes	6
Ferry	East Alaska	Peripheral	14,312	Peripheral	410	6
Halibut Cove	Ring of Fire	Peripheral	Yes	Peripheral	Yes	6
Kotzebue	Kobuk-Seward Peninsula	Peripheral	5,069	Peripheral	4,416	6
New Stuyahok	Bay	Peripheral	3,840	Peripheral	1,866	6
Ninilchik	Ring of Fire	Central	1	Central	159	6
Pedro Bay	Bay	Central	661	Central	72	6
Point Possession	Ring of Fire	Peripheral	Yes	Peripheral	Yes	6
Skwentna	Ring of Fire	Peripheral	23,692	Peripheral	1	6
South Naknek	Bay	Central	25	Central	28	6
Susitna	Ring of Fire	Central	0	Adjacent	1	6
Akiachak	Bering Sea-Western Interior	Peripheral	6,989	Peripheral	994	5
Hope	Ring of Fire	Central	0	Peripheral	83	5
Kiana	Kobuk-Seward Peninsula	Peripheral	4,736	Peripheral	30	5
Kobuk	Kobuk-Seward Peninsula	Peripheral	145	Peripheral	5,095	5



Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Levelock	Bay	Central	3,844	Peripheral	0	5
Manokotak	Bay	Peripheral	160	Central	211	5
McGrath	Bering Sea-Western Interior	Adjacent	Yes	None	0	5
Nikolaevsk	Ring of Fire	Central	0	Peripheral	5	5
Northway	East Alaska	Peripheral	209	Peripheral	3,798	5
Portage Creek	Bay	Peripheral	2,143	Peripheral	34	5
Selawik	Kobuk-Seward Peninsula	Peripheral	145	Peripheral	4,385	5
Seldovia	Ring of Fire	Peripheral	1,702	Peripheral	815	5
Shungnak	Kobuk-Seward Peninsula	Peripheral	145	Peripheral	9,480	5
Sleetmute	Bering Sea-Western Interior	Peripheral	0	Central	Yes	5
Teller	Kobuk-Seward Peninsula	Peripheral	Yes	None	Yes	5
Togiak	Bay	Peripheral	160	Central	211	5
Whittier	Ring of Fire	Peripheral	258	Peripheral	4,915	5
Anvik	Bering Sea-Western Interior	Central	Yes	None	0	4
Chuathbaluk	Bering Sea-Western Interior	Central	Yes	None	0	4
Cooper Landing	Ring of Fire	Peripheral	42	Peripheral	581	4
Dot Lake	East Alaska	Peripheral	208	Peripheral	795	4
Ekwok	Bay	Peripheral	22	Peripheral	28	4
Grayling	Bering Sea-Western Interior	Central	Yes	None	0	4
Igiugig	Bay	Central	3,860	None	0	4
Lower Kalskag	Bering Sea-Western Interior	Central	Yes	None	0	4
Marshall	Bering Sea-Western Interior	Central	1,903	None	0	4
Nanwalek	Ring of Fire	Peripheral	0	Peripheral	272	4
Platinum	Bay	Peripheral	160	Peripheral	211	4
Russian Mission	Bering Sea-Western Interior	Central	1,892	None	0	4
Saint Michael	Bering Sea-Western Interior	Central	Yes	None	0	4
Stebbins	Bering Sea-Western Interior	Central	Yes	None	0	4
Stony River	Bering Sea-Western Interior	None	0	Central	Yes	4
Takotna	Bering Sea-Western Interior	Central	Yes	None	0	4
Telida	Bering Sea-Western Interior	Peripheral	0	Adjacent	0	4
Tuluksak	Bering Sea-Western Interior	Peripheral	804	Peripheral	994	4
Twin Hills	Bay	Peripheral	160	Peripheral	211	4
Tyonek	Ring of Fire	Peripheral	0.04	Peripheral	0.24	4
Unalakleet	Bering Sea-Western Interior	Central	6,390	None	0	4
Upper Kalskag	Bering Sea-Western Interior	Central	Yes	None	0	4
Wales	Kobuk-Seward Peninsula	Adjacent	647	None	0	4

Analysis Community	Planning Area	Lands Losing Federal Subsistence Priority		Lands More Likely to Be Developed		Impact Ranking
		Distance from Community	Acreage	Distance from Community	Acreage	
Beluga	Ring of Fire	Peripheral	0	Peripheral	0	3
Crown Point	Ring of Fire	Peripheral	Yes	None	0	3
Golovin	Kobuk-Seward Peninsula	None	0	Central	813	3
Holy Cross	Bering Sea-Western Interior	Peripheral	Yes	None	0	3
Klukwan	Ring of Fire	Central	4	None	0	3
Lake Minchumina	Bering Sea-Western Interior	Adjacent	0	None	0	3
Moose Pass	Ring of Fire	Peripheral	Yes	None	0	3
Pilot Station	Bering Sea-Western Interior	Peripheral	Yes	None	0	3
Saint Mary's	Bering Sea-Western Interior	Peripheral	Yes	None	0	3
Shageluk	Bering Sea-Western Interior	Peripheral	Yes	None	0	3
Egegik	Ring of Fire	Peripheral	0	Peripheral	0	2
Galena	Bering Sea-Western Interior	Peripheral	15	None	0	2
Haines	Ring of Fire	Central	0	None	0	2
Huslia	Bering Sea-Western Interior	Peripheral	145	None	0	2
Nikolai	Bering Sea-Western Interior	Central	0	None	0	2
Tatitlek	East Alaska	Peripheral	0	Peripheral	0	2
Tetlin	East Alaska	Peripheral	0	Peripheral	0	2
Diomedede	Kobuk-Seward Peninsula	Peripheral	0	None	0	1
Koliganek	Bay	Peripheral	0	None	0	1
Akiak	Bering Sea-Western Interior	None	0	None	0	0
Dry Creek	East Alaska	None	0	None	0	0

Notes:

Distance from Community categorized as follows:

None (no color) = No subsistence use area overlap with 17(d)(1) revocations, or (if use area data not available), community more than 50 miles from 17(d)(1) revocations.

Peripheral (yellow) = Community over 25 miles from 17(d)(1) revocations.

Central (orange) = Community between 5 and 25 miles from 17(d)(1) revocations.

Adjacent (red) = Community within 5 miles of 17(d)(1) revocations.

Acreage categorized as follows:

0 = None

Yes (gray) = Assumed overlap based on 50-mile radius from community.

Low (yellow) = < 1,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

Medium (orange) = between 1,000 and 10,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

High (red) = > 10,000 acres overlapping areas losing Federal subsistence priority or areas more likely to be developed.

Impact ranking (calculated by summing the values for each community) categorized as follows:

None (no color) = zero

Peripheral/less than 1,000 acres (yellow) = 1

Central/between 1,000 and 10,000 acres/"yes" (orange) = 2

Adjacent/over 10,000 acres (red) = 3

\* Areas losing Federal subsistence use priority as a result of the decision from the draft EIS are State top filings that are not otherwise encumbered that would immediately become effective selections.

## ***Evaluation of the Availability of Other Lands***

ANCSA 17(d)(1) withdrawals were originally withdrawn in 1972–1973 pursuant to ANCSA. The purpose sought to be achieved by the BLM is to review the revocation of 17(d)(1) withdrawals as indicated in PLOs 7899 through 7903, and to provide for the orderly management of the public lands in the decision area in a way that is consistent with the purposes of the 17(d)(1) withdrawals to ensure “the public interest in these lands is properly protected.” For Alternative D specifically, the purpose of this alternative is to revoke the ANCSA 17(d)(1) withdrawals consistent with the action described in PLOs 7899, 7900, 7901, 7902, and 7903. Because Alternative D revokes all 17(d)(1) withdrawals within the evaluation area, there are no additional lands available to consider. All lands within the evaluation area would be opened to public land laws, including State selection, and would allow the BLM to fully manage lands pursuant to the RMPs.

## ***Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes***

Alternative D revokes in full all 17(d)(1) withdrawals. The amount of land the State can receive is defined by the Alaska Statehood Act, and no actions taken by the BLM can reduce or eliminate that disposition of the public lands. The only other alternatives considered are to not revoke the 17(d)(1) withdrawals (Alternative A), to only revoke in part State Priority 1 and 2 top filed lands (Alternative B), or to revoke State Priority 1 and 2 top filed lands and lands with a high development potential (Alternative C).

## ***Findings***

This evaluation concludes that Alternative D may result in significant restriction to subsistence uses affecting user access for 117 rural communities that overlap or are adjacent to withdrawals. Subsistence user access for those communities would be affected due to a loss of Federal subsistence priority, resulting in an increase in competition for subsistence resources from non-rural, Federally non-qualified hunters. See Table C-9 for a list of the analyzed communities where this action may significantly restrict subsistence uses and where it would not significantly restrict subsistence uses due to loss of Federal subsistence priority.

In addition, revocation of withdrawals under Alternative D may result in unselected Federal lands becoming open to mineral entry and leasing causing an increase potential for resource development that may result in significant restriction to subsistence uses affecting user access and resource abundance and availability for 119 rural communities that overlap or are adjacent to withdrawals. This evaluation assumes that the potential for ROWs, mineral exploration and development, and other development projects would increase when the lands are conveyed to the State, especially in areas identified as more likely to be developed. See Table C-9 for a list of the analyzed communities where this action may significantly restrict subsistence uses and where it would not significantly restrict subsistence uses due to opening lands to mineral extraction in areas likely to be developed.

**Table C-9. Summary of Findings, Alternative D**

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Akiachak	X		X	
Akiak		X		X
Aleknagik	X		X	
Ambler	X		X	
Anderson	X		X	
Aniak	X		X	
Anvik	X			X
Beluga		X		X
Brevig Mission	X		X	
Buckland	X		X	
Cantwell	X		X	
Chase	X		X	
Chickaloon	X		X	
Chistochina	X		X	
Chitina	X		X	
Chuathbaluk	X			X
Clark's Point	X		X	
Cooper Landing	X		X	
Copper Center	X		X	
Cordova	X		X	
Crooked Creek	X		X	
Crown Point	X			X
Deering	X		X	
Denali Park	X		X	
Dillingham	X		X	
Diomedes		X		X
Dot Lake	X		X	
Dry Creek		X		X
Egegik		X		X
Ekuk	X		X	
Ekwok	X		X	
Elim	X		X	
Eureka Roadhouse	X		X	
Ferry	X		X	
Fox River	X		X	

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Gakona	X		X	
Galena	X			X
Georgetown	X		X	
Glacier View	X		X	
Glennallen	X		X	
Golovin		X	X	
Grayling	X			X
Gulkana	X		X	
Haines		X		X
Halibut Cove	X		X	
Happy Valley	X		X	
Healy	X		X	
Holy Cross	X			X
Hope		X	X	
Huslia	X			X
Igiugig	X			X
Iliamna	X		X	
Kenny Lake	X		X	
Kiana	X		X	
King Salmon	X		X	
Kivalina	X		X	
Klukwan	X			X
Kobuk	X		X	
Kokhanok	X		X	
Koliganek		X		X
Kotzebue	X		X	
Koyuk	X		X	
Lake Louise	X		X	
Lake Minchumina		X		X
Levelock	X			X
Lower Kalskag				X
Manokotak	X		X	
Marshall	X			X
McGrath	X			X
Mendeltna	X		X	
Mentasta Lake	X		X	

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Moose Pass	X			X
Nabesna	X		X	
Naknek	X		X	
Nanwalek		X	X	
Napaimute	X		X	
Nelchina	X		X	
New Stuyahok	X		X	
Newhalen	X		X	
Nikolaevsk		X	X	
Nikolai		X		X
Ninilchik	X		X	
Noatak	X		X	
Nome	X		X	
Nondalton	X		X	
Noorvik	X		X	
Northway	X		X	
Paxson	X		X	
Pedro Bay	X		X	
Petersville	X		X	
Pilot Station	X			X
Platinum	X		X	
Point MacKenzie	X		X	
Point Possession	X		X	
Pope-Vannoy Landing	X		X	
Port Alsworth	X		X	
Portage Creek	X		X	
Red Devil	X		X	
Russian Mission				X
Saint Mary's	X			X
Saint Michael				X
Selawik	X		X	
Seldovia	X		X	
Shageluk	X			X
Shaktolik	X		X	
Shungnak	X		X	
Silver Springs	X		X	

Analysis Community	Loss of Federal Subsistence Priority		Increased Potential for Development	
	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use
Skwentna	X		X	
Slana	X		X	
Sleetmute		X	X	
South Naknek	X		X	
Stebbins	X			X
Stony River		X	X	
Sunrise	X		X	
Susitna		X	X	
Susitna North	X		X	
Takotna	X			X
Talkeetna	X		X	
Tanacross	X		X	
Tatitlek		X		X
Tazlina	X		X	
Telida		X		X
Teller	X		X	
Tetlin		X		X
Togiak	X		X	
Tok	X		X	
Tolsona	X		X	
Tonsina	X		X	
Trapper Creek	X		X	
Tuluksak	X		X	
Twin Hills	X		X	
Tyonek		X		X
Unalakleet	X			X
Upper Kalskag	X			X
Wales	X			X
White Mountain	X		X	
Whittier	X		X	
Willow	X		X	
Willow Creek	X		X	

## Evaluation and Findings for the Cumulative Case

Draft EIS Section 3.14.1.2.7 provides an analysis of cumulative impacts on subsistence user access, resource abundance, and resource availability. Past, present, and reasonably foreseeable future activities,

in combination with revocation of withdrawals on 17(d)(1) withdrawals, would increase the potential for impacts on subsistence user access, resource abundance, and resource availability. Existing impacts on subsistence from past and present actions are discussed in draft EIS Sections 3.14.1.1.4, 3.14.2.1.2, and 3.14.3.1.1. Past and existing impact sources include subsistence management; prior land selections and land conveyances out of Federal ownership; development infrastructure, activities, and security restrictions; and climate change. Reasonably foreseeable future projects within the five planning areas include infrastructure, power, and transportation projects; mining and oil and gas development; recreation; and changes to land and resource management.

### ***Evaluation of the Effect of Use, Occupancy, or Disposition on Subsistence Use and Need***

Past, present, and reasonably foreseeable future activities, in combination with revocation of withdrawals on 17(d)(1) withdrawals, would increase the potential for impacts on subsistence user access, resource abundance, and resource availability. Revocation of withdrawals and associated changes in land management and development opportunities would likely result in impacts to resource abundance, resource availability, and subsistence user access for communities who use 17(d)(1) withdrawals or who harvest resources that migrate through 17(d)(1) withdrawals. In particular, communities near to or with subsistence use areas overlapping lands more likely to be developed or where there may be a loss of Federal subsistence priority are most likely to experience cumulative impacts on subsistence.

Revocation of withdrawals could result in more lands becoming available for development infrastructure and activities. In general, future development of the planning areas would further expand the total developed area, increasing the frequency and likelihood of impacts to subsistence uses. Reasonably foreseeable mining and oil and gas development projects would contribute to impacts associated with noise, traffic, human activity, infrastructure, and contamination. Noise, traffic, and human activity could affect resource availability by diverting resources from their expected migratory routes or causing a shift in resource distribution. Infrastructure such as roads and pipelines could also deflect or delay resource movements, or cause shifts in habitat use. These changes could make certain resources less available to subsistence users in traditional places at traditional times. Development can also contribute to impacts on subsistence user access by causing physical obstructions to overland travel or by introducing restrictions on subsistence uses near development infrastructure.

There are reasonably foreseeable mining projects in all five planning areas, with the Kobuk-Seward Peninsula planning area having the greatest potential for future mining projects. If revocation of 17(d)(1) withdrawals results in the opening of more lands to mining development, then there would be greater cumulative impacts to subsistence users, particularly in the Kobuk-Seward Peninsula planning area, resulting from development activities and infrastructure. Mine pits, roads, pipelines, and associated buildings would contribute to habitat fragmentation, loss of subsistence use areas, and changes in subsistence user access for rural communities. Traffic associated with transport of mine ore and mine workers, including ground and air traffic, would contribute to disturbances of subsistence resources and subsistence hunters, potentially reducing the availability of resources such as caribou and moose to local hunters. Restrictions on firearm discharge around mine facilities as well as security restrictions around development areas would contribute to impacts to subsistence user access. Although less common within the five planning areas, oil and gas development would similarly contribute to impacts related to infrastructure, noise and traffic, human activity, and security restrictions. Reasonably foreseeable oil and gas activities are most common in the Ring of Fire and East Alaska planning areas and include the Beluga River Unit Gas Well (Ring of Fire), Donlin Mine Gas Pipeline (Ring of Fire and Bering Sea-Western Interior), Alaska LNG pipeline (East Alaska, Ring of Fire), and continued maintenance of the Trans-Alaska Pipeline System (East Alaska).



Communication infrastructure, ROW access, power, and transportation projects in four of the five planning areas (Kobuk-Seward Peninsula, Bering Sea-Western Interior, Bay, and East Alaska) would contribute to 1) increased development in the planning areas through an increase in construction noise, traffic, and human activity during infrastructure installation and 2) the creation of ROWs, which could increase access by non-local hunters into previously difficult to access areas. Increased roads and associated traffic would also contribute to changes in resource availability and abundance. ROWs associated with development of the planning areas, in combination with loss of Federal subsistence priority as a result of revocation of 17(d)(1) withdrawals, could increase competition and decrease hunting success for rural subsistence users. Changes to waterways resulting from road, bridge, and culvert construction as well as increased sedimentation could contribute to impacts on fish availability. In the East Alaska planning area, the Susitna Watana Dam could contribute to changes in fish availability through impacts on access to spawning grounds. Reasonably foreseeable transportation projects are most common in the Kobuk-Seward Peninsula planning area and include the Ambler Road, which would facilitate mining access in the planning area, affect subsistence user access, and potentially increase outsider access into the planning area through the creation of ROWs.

Construction of additional roads and infrastructure in the future would contribute to fragmentation of habitat for such resources as caribou, moose, furbearers, and waterfowl. Infrastructure would remove usable habitat for these resources and, in the case of caribou, could cause substantial changes in range distribution. Impacts on migrating caribou increase with density of roads and infrastructure; thus, increased development of the planning areas resulting from reasonably foreseeable development activities and revocation of 17(d)(1) withdrawals would contribute to changes in caribou migration, distribution, and abundance, with resulting impacts on subsistence resource availability to communities that use these resources.

If mining, oil and gas, infrastructure, and transportation projects reduce resource availability for subsistence analysis communities or if they decrease access to traditional use areas, then residents may have to spend greater amounts of time, effort, and money in order to locate and procure these resources. Residents may also have to travel farther to less familiar areas to find resources, with greater risks to health and safety, which may be compounded by similar impacts related to climate change. Although some hunters respond to changes in resource availability or subsistence user access by taking more trips and increasing costs in order to harvest what they need, others may choose to take fewer trips because of lack of funds or reduced success.

The overall area available for subsistence use may shrink over time due to the increasing presence of infrastructure and human activity in traditional use areas. Although subsistence users would adapt, to varying extents, to the changes occurring around them and may continue to harvest resources at adequate levels, their connection to certain traditional areas may decrease over time. Such changes have been documented on the North Slope of Alaska as a result of oil and gas development, particularly for the community of Nuiqsut, which has experienced a gradual shift in subsistence use areas away from the Prudhoe Bay area (SRB&A 2018). An increase in road corridors in traditional use areas could also shift how residents access subsistence harvesting areas, such as via roads, but could also affect resource availability, particularly for those who choose not to use roads. Such changes, including increased use of roads, combined with changes in harvesting patterns and resource availability, have been documented in Alaska (SRB&A 2007, 2023). Roads, if available for use by local subsistence users, could have a positive impact of increased access for residents into areas previously inaccessible during certain times of year. If roads are closed to use by local residents, then the impacts of the roads on resource availability and subsistence user access would be greater.

The above reasonably foreseeable mining, oil and gas, transportation, and infrastructure projects could contribute to contamination of waterways, air, and foraging habitat through oil spills, mine tailings, fugitive dust from roads and construction, and emissions from equipment. In combination with increased

lands open to development as a result of revocation of 17(d)(1) withdrawals, cumulative spills could reduce the abundance of certain subsistence resources including salmon, non-salmon fish, waterfowl, and vegetation.

Increased recreation throughout the five planning areas, including increased opportunities for commercial big game hunting and other recreational activities, could contribute to increased competition for rural users resulting from changes in land management and a loss of Federal subsistence priority. Increased competition and decreased resource availability may result in residents having to travel farther and spend more time, money, and effort to harvest such resources as moose and caribou.

Past and reasonably foreseeable future land conveyances and changes in landownership, in combination with the revocation of withdrawals considered in this analysis, could contribute to impacts on subsistence user access and resource availability across the state. Access to Federal lands varies by community and region. On Federal public lands, rural residents typically have a subsistence priority (unless those lands are State or ANC selected under ANCSA) and, under ANILCA, reasonable subsistence access is guaranteed (see draft EIS Section 3.14.1.1.1). Conveyance of lands out of Federal ownership results in a loss of Federal subsistence priority, which can result in a decrease in access for rural subsistence users, an increase in competition with non-rural users, and reduced harvest success and opportunities to conduct traditional subsistence activities. Ongoing land conveyances have already led to some communities losing Federal subsistence priority on lands used for subsistence harvesting. Communities in the Kobuk-Seward Peninsula planning area have the current greatest amount of subsistence use areas overlapping Federal lands with Federal subsistence priority (see draft EIS Table 3.14-4). Communities in the East Alaska planning area would lose the greatest number of acres of Federal Subsistence Priority under the action alternatives (see Tables C-1, C-4, and C-7).

Alternatives that revoke the greatest acreage of 17(d)(1) withdrawals have the greatest potential contribution to cumulative effects on subsistence uses and resources. This is because they would be most likely to cause an immediate loss of Federal subsistence priority for rural residents, and because they would be most likely to open new lands to development. Thus, Alternative D would have the largest potential contribution to cumulative effects on subsistence uses and resources, followed by Alternative C and Alternative B. However, another action affecting the amount of Federal subsistence priority lands would be the relinquishing of State and ANC selections due to overselection, and the return of those lands to Federal management. Thus, following a temporary loss of Federal subsistence priority on some subsistence lands for up to 113 communities, many Priority 3 and 4 lands would return to Federal ownership and thus gain Federal subsistence priority status. This would happen, eventually, under all alternatives.

As shown in the draft EIS Table 3.14-9, despite the proposed action, most communities would experience a net gain in lands with Federal subsistence priority within their harvesting area once State Priority 3 and 4 lands are relinquished by the State. Additional lands may return to Federal management once the ANC conveyances have been completed and remaining selections are relinquished. Under Alternative B, only two communities (Nikolaevsk and Nabesna) would have a net loss in Federal subsistence priority once Priority 3 and 4 lands return to Federal ownership. Under Alternative C, 12 communities would have a net loss in Federal subsistence priority lands, primarily those in the East Alaska region but also in the Ring of Fire planning area. Under Alternative D, 12 communities would have a net loss in Federal subsistence priority lands once Priority 3 and 4 selections are relinquished by the State, also in the East Alaska and Ring of Fire Planning areas. Communities experiencing the greatest net loss of Federal Subsistence Priority under Alternatives C and D are Trapper Creek, Nabesna, Slana, Gulkana, Glennallen, and Skwentna (see draft EIS Table 3.14-9). Despite the eventual return of many lands to Federal management, the short-term loss of Federal subsistence priority could still have long-term impacts on user access, resource abundance, and resource availability. Local subsistence users may quickly alter land use patterns in response to changes in land management. On the North Slope, for example, access to industrial

roads led to documentable changes in subsistence land patterns within several years of road construction (SRB&A 2023).

In addition to the 17(d)(1) withdrawals being considered in the draft EIS, land management decisions in other planning areas, including the Central Yukon and Eastern Interior planning areas, would contribute to impacts on subsistence users. As shown in the draft EIS Table 3.14-10, 40 communities in four of the five planning areas (Ring of Fire, East Alaska, Kobuk-Seward Peninsula, and Bering Sea-Western Interior) would further lose areas of Federal subsistence priority upon revocation of withdrawals in the Central Yukon and Eastern Interior planning areas. Talkeetna would experience the greatest loss of Federal subsistence priority in terms of acreage (101,211 acres), followed by several communities in the Kobuk-Seward Peninsula planning area (Ambler, Shungnak, Selawik, and Kobuk) and two in the Bering Sea-Western Interior planning area (Huslia and Galena). Communities with the greatest overall loss of Federal subsistence priority due to revocation of withdrawals across all planning areas would likely experience the greatest cumulative impacts on subsistence.

### ***Evaluation of the Availability of Other Lands***

The evaluation of the availability of other lands is identical to that provided above under Alternative D.

### ***Evaluation of Other Alternatives that Would Reduce or Eliminate the Use, Occupancy, or Disposition of Public Lands Needed for Subsistence Purposes***

The evaluation of other alternatives is identical to that provided above under Alternative D.

### ***Findings***

Past, present, and reasonably foreseeable future activities, in combination with revocation of withdrawals on 17(d)(1) withdrawals, would increase the potential for impacts on subsistence user access, resource abundance, and resource availability. Past and existing impact sources include subsistence management; prior land selections and land conveyances out of Federal ownership; development infrastructure, activities, and security restrictions; and climate change. Reasonably foreseeable development within the five planning areas includes communication infrastructure, ROW access, infrastructure, power generation, and transportation projects; mining and oil and gas development; recreation; and changes to land and resource management. Possible reasonably foreseeable actions are summarized in draft EIS Table 3.1-6. All five planning areas in this analysis have reasonably foreseeable planned actions that may contribute to the cumulative impacts to subsistence user access and availability and abundance of subsistence resources.

The cumulative case for the ANCSA (d)(1) withdrawals as presented in this analysis may result in significant restriction to subsistence uses affecting user access and availability and abundance of subsistence resources for the same communities listed in Alternative B, C, and D. Alternatives that revoke the greatest acreage of 17(d)(1) withdrawals have the greatest potential effects to cumulative impacts on subsistence uses and resources, because those alternatives would be more likely to cause the greatest immediate loss of Federal subsistence priority and because those alternatives would be more likely to open new lands to development. Therefore, Alternative D would have the largest potential contribution to cumulative impacts on subsistence uses and resources, followed by Alternative C, and Alternative B, because the greatest amount of land would lose its Federal subsistence priority for users and become open to potential development. See Table C-10 for a list of the analyzed communities where this action may significantly restrict subsistence uses and where it would not significantly restrict subsistence uses for each alternative and cumulative effects.

**Table C-10. Summary of Findings**

Analysis Community	Alternative B		Alternative C		Alternative D		Cumulative	
	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use
Akiak	X		X		X		X	
Akiakchak	X			X		X		X
Aleknagik	X			X		X		X
Ambler		X		X		X		X
Anderson		X		X		X		X
Aniak	X			X		X		X
Anvik	X		X			X		X
Beluga	X		X		X		X	
Brevig Mission	X			X		X		X
Buckland	X			X		X		X
Cantwell		X		X		X		X
Chase		X		X		X		X
Chickaloon		X		X		X		X
Chistochina		X		X		X		X
Chitna		X		X		X		X
Chuathbaluk	X			X		X		X
Clark's Point		X		X		X		X
Cooper Landing		X		X		X		X
Copper Center		X		X		X		X
Cordova		X		X		X		X
Crooked Creek	X			X		X		X
Crown Point		X		X		X		X
Deering	X			X		X		X

Analysis Community	Alternative B		Alternative C		Alternative D		Cumulative	
	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use
Denali Park		X		X		X		X
Dillingham		X		X		X		X
Diomedes	X		X		X		X	
Dot Lake		X		X		X		X
Dry Creek	X		X		X		X	
Egegik	X		X		X		X	
Ekuk	X			X		X		X
Ekwok		X		X		X		X
Elim	X			X		X		X
Eureka Roadhouse		X		X		X		X
Ferry		X		X		X		X
Fox River		X		X		X		X
Gakona		X		X		X		X
Galena	X		X			X		X
Georgetown	X			X		X		X
Glacier View		X		X		X		X
Glennallen		X		X		X		X
Golovin	X			X		X		X
Grayling	X		X			X		X
Gulkana		X		X		X		X
Haines	X		X		X		X	
Halibut Cove		X		X		X		X
Happy Valley		X		X		X		X
Healy		X		X		X		X

Analysis Community	Alternative B		Alternative C		Alternative D		Cumulative	
	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use
Holy Cross	X			X		X		X
Hope		X		X		X		X
Huslia	X		X			X		X
Igiugig	X			X		X		X
Illiamna		X		X		X		X
Kenny Lake		X		X		X		X
Kiana		X		X		X		X
King Salmon		X		X		X		X
Kivalina	X		X			X		X
Klukwan	X		X			X		X
Kobuk	X			X		X		X
Kokhanok		X		X		X		X
Koliganek	X		X		X		X	
Kotzebue		X		X		X		X
Koyuk	X			X		X		X
Lake Louise		X		X		X		X
Lake Minchumina	X		X		X		X	
Levelock		X		X		X		X
Lower Kalskag	X			X		X		X
Manokotak	X			X		X		X
Marshall	X			X		X		X
McGrath		X		X		X		X
Mendeltna		X		X		X		X
Mentasta Lake		X		X		X		X

Analysis Community	Alternative B		Alternative C		Alternative D		Cumulative	
	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use
Moose Pass		X		X		X		X
Nabesna		X		X		X		X
Naknek		X		X		X		X
Nanwalek		X		X		X		X
Napaimute	X			X		X		X
Nelchina		X		X		X		X
New Stuyahok	X			X		X		X
Newhalen		X		X		X		X
Nikolaevsk		X		X		X		X
Nikolai	X		X		X		X	
Ninilchik		X		X		X		X
Noatak	X		X			X		X
Nome		X		X		X		X
Nondalton		X		X		X		X
Noorvik		X		X		X		X
Northway		X		X		X		X
Paxson		X		X		X		X
Pedro Bay		X		X		X		X
Petersville		X		X		X		X
Pilot Station	X			X		X		X
Platinum	X			X		X		X
Point MacKenzie		X		X		X		X
Point Possession		X		X		X		X
Pope-Vannoy Landing		X		X		X		X

Analysis Community	Alternative B		Alternative C		Alternative D		Cumulative	
	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use
Port Alsworth		X		X		X		X
Portage Creek	X			X		X		X
Red Devil	X			X		X		X
Russian Mission	X			X		X		X
Saint Mary's	X			X		X		X
Saint Micheal	X			X		X		X
Selawik	X			X		X		X
Seldovia		X		X		X		X
Shageluk	X		X			X		X
Shaktoolik	X			X		X		X
Shungnak	X			X		X		X
Silver springs		X		X		X		X
Skwentna	X			X		X		X
Slana		X		X		X		X
Sleetmute	X			X		X		X
South Nalnek		X		X		X		X
Stebbins	X			X		X		X
Stony River	X			X		X		X
Sunrise		X		X		X		X
Susitna	X			X		X		X
Susitna North		X		X		X		X
Takotna		X		X		X		X
Talkeetna		X		X		X		X
Tanacross		X		X		X		X



Analysis Community	Alternative B		Alternative C		Alternative D		Cumulative	
	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use	Would Not Result in Significant Restriction to Subsistence Use	May Result in Significant Restriction to Subsistence Use
Tatitlek	X		X		X		X	
Tazlina		X		X		X		X
Telida	X		X		X		X	
Teller		X		X		X		X
Tetlin	X		X		X		X	
Togiak	X			X		X		X
Tok		X		X		X		X
Tolsana		X		X		X		X
Tonsina		X		X		X		X
Trapper Creek		X		X		X		X
Tuluksak	X			X		X		X
Twin Hills	X			X		X		X
Tyonek	X			X	X			X
Unalakleet	X			X		X		X
Upper Kalskag	X			X		X		X
Wales		X		X		X		X
White Mountain		X		X		X		X
Whittier		X		X		X		X
Willow		X		X		X		X
Willow Creek	X			X		X		X

## NOTICE AND HEARINGS

Section 810(a) of ANILCA 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). The BLM will provide notice in the *Federal Register* that it made positive findings pursuant to ANILCA 810 that Alternatives B, C, and D, and the cumulative case presented in the draft EIS, met the “may significantly restrict” threshold. As a result, public hearings will be held in the vicinity of potentially affected communities. because of the large number of communities impacted, the hearings will be held in hub communities associated with each affected community to provide the most opportunity to impacted individuals to participate. Additionally, the BLM will have virtual meetings for those who cannot be physically present. Notice of these hearings will be provided in the *Federal Register*, through the local media, as well as posted to the BLM’s project website at: <https://eplanning.blm.gov/eplanning-ui/admin/project/2018002/510>.

Communities that may experience significant restrictions to subsistence use are listed in Tables C-3, C-6, C-9, and C-10.

## SUBSISTENCE DETERMINATIONS UNDER ANILCA SECTIONS 810(A)(3)(A), (B), AND (C)

Section 810(a) of ANILCA provides that no withdrawal, reservation, lease, permit, or other use, occupancy, or disposition of the public lands that 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 that must be made 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 United States Code 3120(a)(3)(A), (B), and (C)).

The BLM has found in this preliminary ANILCA 810 evaluation that Alternatives B, C, and D and the cumulative case considered in the draft EIS may significantly restrict subsistence uses. Therefore, the BLM will undertake the notice and hearing procedures required by ANILCA 810(a)(1) and (2) in conjunction with the release of the draft EIS to solicit public comment from the potentially affected communities.

Should the proposed action have a positive finding, the determination that the requirements of ANILCA 810(a)(A), (B), and (C) have been met will be analyzed in the final ANILCA 810 evaluation. The final evaluation will integrate input voiced during the hearings by residents of potentially affected communities.

## LITERATURE CITED

- ABR, Inc., and Stephen R. Braund & Associates (SRB&A). 2014. *Assessment of the Potential Effects of an Elevated Pipeline Along the Red Dog Mine Haul Road on Caribou Distribution, Movements, and Crossing Success. Part One: Review of Literature and Expert Opinion*. Prepared for Red Dog Operations, Anchorage, Alaska. Fairbanks, Alaska: ABR, Inc., Environmental Research & Services, and Anchorage, Alaska: Stephen R. Braund & Associates. Available at: [https://srbak.squarespace.com/s/Caribou-and-Linear-Structures\\_Final\\_April-2014\\_new\\_SRBA.pdf](https://srbak.squarespace.com/s/Caribou-and-Linear-Structures_Final_April-2014_new_SRBA.pdf). Accessed September 12, 2023.
- Alaska Department of Fish and Game. 2022. 2022-2023 Alaska Hunting Regulations. Juneau: Alaska Department of Fish and Game.
- Bureau of Land Management (BLM). 2023. Federal Caribou and Moose Subsistence Permit Data, 2010-2022.
- Federal Subsistence Management Program. 2020. Federal Subsistence Management Regulations for the Harvest of Wildlife on Federal Public Lands in Alaska. Anchorage, Alaska: Federal Subsistence Management Program.
- . 2022. Changes in Federal Moose and Caribou Hunting Regulations in Units 23 and 26A. April 6. Available at: <https://www.doi.gov/subsistence/news/general/changes-federal-moose-and-caribou-hunting-regulations-units-23-and-26a>. Accessed September 12, 2023.
- Georgette, S., and H. Loon. 1988. *The Noatak River: Fall Caribou Hunting and Airplane Use*. Technical Paper No. 162. Kotzebue: Division of Subsistence, Alaska Department of Fish and Game.
- Guettabi, M., J. Greenberg, J. Little, and K. Joly. 2016. *Evaluating Differences in Household Subsistence Harvest Patterns between the Ambler Project and Non-Project Zones*. Natural Resource Report NPS/GAAR/NRR—2016/1280. Fort Collins, Colorado: National Park Service Natural Resource Stewardship and Science.
- Magdanz, J. S., J. Greenberg, J. Little, and D. Koster. 2016. The Persistence of Subsistence: Wild Food Harvests in Rural Alaska, 1983-2013. *Social Science Research Network* 2779464. <http://dx.doi.org/10.2139/ssrn.2779464>
- Stephen R. Braund & Associates (SRB&A). 2007. *Subsistence Use Areas and Traditional Knowledge Study for Tyonek and Beluga, Alaska*. Prepared for Drven Corporation. Anchorage, Alaska.
- . 2009. *Impacts and Benefits of Oil and Gas Development to Barrow, Nuiqsut, Wainwright, and Atkasuk Harvesters*. Prepared for the North Slope Borough Department of Wildlife Management, Barrow, Alaska. Anchorage, Alaska: Stephen R. Braund & Associates.
- . 2014. *Assessment of the Potential Effects of an Elevated Pipeline Along the Red Dog Mine Haul Road on Caribou Distribution, Movements, and Crossing Success. Part Two: Report of Traditional Knowledge Workshops, Kivalina and Noatak*. Prepared for Teck Alaska Incorporated, Anchorage, Alaska. Available at: [https://srbak.squarespace.com/s/Caribou-and-Linear-Strucures\\_Vol-2\\_Traditional-Knowledge\\_Sept-2014.pdf](https://srbak.squarespace.com/s/Caribou-and-Linear-Strucures_Vol-2_Traditional-Knowledge_Sept-2014.pdf). Anchorage, Alaska: Stephen R. Braund & Associates.
- . 2018. *Nuiqsut Paisanich: A 2018 Addendum*. Prepared for the City of Nuiqsut. Anchorage, Alaska: Stephen R. Braund & Associates.

———. 2023. *Nuiqsut Caribou Subsistence Monitoring Project: 2021 (Year 14) Report*. Submitted to ConocoPhillips, Alaska, Inc., and North Slope Borough Department of Wildlife Management. May 17, 2023. Anchorage, Alaska: Stephen R. Braund & Associates.

Sullender, B. 2017. *Ecological Impacts of Road- and Aircraft-Based Access to Oil Infrastructure*. Edited by Audubon Alaska.

*This page intentionally left blank.*