

Bering Sea - Western Interior Resource Management Plan

BLM



Wild & Scenic River Study Report

This report evaluates the eligibility and suitability of waterways located within the Bering Sea Western Interior Resource Management Planning Area for potential inclusion in the National Wild and Scenic River System

Anchorage Field Office Office

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Alaska



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LIST OF ACRONYMS

ACEC	Area of Critical Environmental Concern
ADFG	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
AFO	Anchorage Field Office
ANCSA	Alaska Native Claims Settlement Act
ANILCA	Alaska National Interest Lands Conservation Act
AO	Authorized Officer
AWC	Anadromous Waters Catalog
BLM	Bureau of Land Management
BSWI	Bering Sea Western Interior Resource
CSU	Conservation System Unit
EIS	Environmental Impact Statement
FR	Federal Register
HVW	High Value Watershed
INHT	Iditarod National Historic Trail
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service
NOI	Notice of Intent
NRHP	National Register of Historic Places
NRI	National River Inventory
ORV	Outstandingly Remarkable Values
PLO	Public Land Order
RAC	Resource Advisory Council
RMP	Resource Management Plan
SRP	Special Recreation Permit
UAS	Unmanned Aerial System
USFWS	United States Fish and Wildlife Service
WSRA	Wild and Scenic Rivers Act
WSR(s)	Wild and Scenic River(s)

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Executive Summary

This report documents the Wild and Scenic River Study prepared for the Bureau of Land Management (BLM) Bering Sea-Western Interior (BSWI) Resource Management Planning Area (BSWI planning area) pursuant to Section 5(d)(1) of the Wild and Scenic Rivers Act (WSRA) and other relevant laws and policies. It serves as an update to the Wild and Scenic Eligibility Report prepared by the BLM in 2015 (BLM 2015), including a re-evaluation of the eligibility determination provided in that report, and a suitability analysis.

The evaluation of a river(s) for possible inclusion in the Wild and Scenic Rivers System (National System) follows a three-step process (BLM 2012): (1) determination of eligibility, (2) tentative classification as wild, scenic, or recreational, and (3) a suitability analysis. The eligibility determination evaluates rivers or river segments for potential inclusion in the National System based on their status as free flowing and possessing one or more outstandingly remarkable value(s) (ORV). Section 16(b) of the WSRA defines “free-flowing” as: “existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping or other modification. The existence, however, of low dams, diversion works, and other minor structures at the time any river is proposed for inclusion in the national wild and scenic rivers system shall not automatically bar its consideration for such inclusion: *Provided*, That this shall not be construed to authorize, intend, or encourage future construction of such structures within components of the national wild and scenic rivers system” (16 USC § 1286).

ORVs are river-related values or features considered unique, rare, or exemplary, and exceptional at a comparative regional or national scale. The tentative classification of eligible rivers as wild, scenic, or recreational is based on the condition of the river and adjacent lands as they exist at the time of the study. Finally, the suitability analysis provides the basis for determining which rivers to recommend to Congress as potential additions to the National System. The outcome of this Wild and Scenic River Study is a preliminary determination of suitability; the final determination will be made through the environmental impact statement (EIS) prepared for the BSWI Resource Management Plan (RMP).

This eligibility study inventoried 255 rivers and streams within the BSWI planning area for free-flowing qualities and the presence of one or more ORVs. No rivers considered in the inventory were segmented because: (1) river conditions were consistent for the length of the system; (2) there were no major changes in the type or amount of development; and (3) resource values were considered reasonably consistent along each waterway.

The 2015 Wild and Scenic Eligibility Report (BLM 2015) concluded that 22 waterbodies met the criteria for free-flowing condition and possession of one or more ORV. During the suitability study completed in 2017-2018, these criteria were reexamined by a broader Interdisciplinary Team (ID Team). Based on the additional review provided by these subject matter experts, four waterbodies were determined to not possess ORVs considered unique, rare, exemplary, or exceptional at a comparative regional scale: Kuskokwim River, Khuchaynik Creek, McDonald Creek, and the Unalakleet River (excluding the segment designated a Wild and Scenic River [WSR]). Consequently, in this updated eligibility report, these waterbodies were excluded from further consideration.

During the suitability study completed in 2017-2018, these criteria were reexamined by a broader Interdisciplinary Team (ID Team). Based on the additional review provided by these subject matter

experts, four additional waterbodies were determined to not possess ORVs considered unique, rare, exemplary, or exceptional at a comparative regional scale. Consequently, in this updated eligibility report, the waterbodies listed below were excluded from further consideration based on the following rationale:

- **Kuskokwim River** – In the 2015 assessment, this creek was identified as having an ORV for fish, cultural, and historic; however, further specialist review by the ID Team in 2017 determined that there are no known National Register of Historic Places (NRHP) eligible sites in the particular segment and although the waterbody contains important salmon and whitefish species, they are not considered unique in the area. This determination of eligibility for inclusion in the National System was revoked from the initial draft determination.
- **Khuchaynik Creek** – In the 2015 assessment this creek was identified as having an ORV for fish; however, further specialist review by the ID Team in 2017 determined that Khuchaynik Creek is not listed in the Alaska Department of Fish and Game (ADFG) Alaska Anadromous Waters Catalog (AWC) and does not meet the ORV for fish and. This determination of eligibility for inclusion in the National System was revoked from the initial draft determination.
- **McDonald Creek** – The ADFG AWC identifies McDonald Creek as having Chinook salmon rearing habitat, chum salmon spawning habitat, and white fish present on portions that BLM manages. The creek originates in the Nulato Hills and flows south east into the Anvik River for 60 miles. Although 100 percent of the river flows through BLM managed lands, over 90 percent is state-selected. This is a very remote section of creek and seldom visited as boat traffic is usually not possible this far up the Anvik River. Although the waterbody contains important Chinook salmon, the 2017 ID Team determined it is not considered unique in the area.
- **Unalakleet River** – The Unalakleet National Wild River corridor ends at its confluence with the Chirokey River, 24 river miles from the village of Unalakleet. Seventy-four percent of this waterway is already included with the National System, under the management of BLM. The remaining 26 percent of this river crosses Alaska Native-owned lands only and per review by the 2017 ID Team it is therefore not being analyzed for eligibility or suitability by BLM.

Section 3.2(2) of BLM Manual 6400 states that the study of rivers identified by the BLM under Section 5(d)(1) of the WSRA may be discontinued upon a finding of ineligibility; consequently, no further evaluation of these rivers was completed.

One additional change that differed from the 2015 Wild and Scenic Eligibility Report was in the renaming of Otter Creek (Aniak): This waterbody was renamed “Otter Creek (Tuluksak)” to be more representative of its geographic location. This waterbody was considered eligible for inclusion in the National System in the 2015 Eligibility Report and remains eligibility in the 2016-2017 re-evaluation.

The suitability assessment resulted in a preliminary determination of “unsuitable” for all 18 eligible rivers studied. Though rationale for this determination varied by waterway, general conclusions were made based on the lack of local and State support for designation, remoteness, locations outside of areas identified as medium to high mineral potential (therefore less risk for mineral development), and the presumption that ORVs could be protected through existing federal or State management provisions or those management actions being contemplated by the BSWI RMP/EIS.

Existing state-level management provisions for fisheries management are provided through implementation of Alaska Department of Natural Resources (ADNR) Area Plans (ADNR 2016), the Anadromous Fish Act (AS 16.05.871-.901), and the Fishway or Fish Passage Act (AS 16.05.841). Additional federal protections are provided through existing or nominated BLM Areas of Critical Environmental Concern (ACECs) and High Value Watersheds (HVW); management standards associated with these areas are being contemplated by the BSWI RMP/EIS. Review of potential impacts to cultural and historic resources is provided at the implementation-level by the State level through the State Historic Preservation Office (SHPO), and at the federal level through the Section 106 process. The BLM, through the RMP, also provides protection to these resources, as well as to recreation resources, through ACEC designations and applied Visual Resource Management objectives. Management standards aimed at protecting areas with historic, cultural, and recreational ORVs are also being contemplated in the preferred alternative of the BSWI RMP. The protection of these ORVs will be subject to existing authorities of the Federal Land Policy and Management Act, the Clean Water Act, the Archeological Resources Protection Act, and the National Historic Preservation Act.

The final recommendation of suitability for inclusion of the 18 eligible rivers in the National System will be made through the BSWI RMP/EIS process.

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1. Wild and Scenic River Study

1.1 Introduction

Two provisions of the Wild and Scenic Rivers Act (WSRA) direct the study of rivers in the United States for potential inclusion in the Wild and Scenic River (WSR) System (National System):

- Section 5(a), whereby Congress directs the study of select rivers, and
- Section 5(d)(1), whereby federal agencies are directed to identify potential additions to the National System through the land use planning process.

Additionally, within the State of Alaska, Section 604 of the Alaska National Interest Lands Conservation Act (ANILCA) amended section 5(a) of the WSRA to direct the study of eleven Alaskan rivers and river segments. The river studies were to be complete within an identified timeframe after ANILCA passed and study recommendations provided to Congress regarding possible inclusion into the National System. The study teams included multiple federal, state, local, and Alaska Native agencies and corporations. The Yukon River, a segment of which is included in this current study, was also evaluated in the early 1980s as a Section 5(a) river as directed by the ANILCA. The segment of river studied at that time, the Ramparts Section, was not recommended as suitable for inclusion in the National System at that time.

This study was completed per guidance provided in the BLM's Wild and Scenic Rivers Manual (BLM Manual 6400). The results of this study will provide a preliminary determination of suitability for inclusion of river segments within the BSWI planning area in the National System.

1.2 The Wild and Scenic River Study Process

The evaluation of a river(s) for possible inclusion in the National System follows a three-step process, summarized below (BLM 2012):

1. **Determination of eligibility.** The first phase of a WSR study is the eligibility determination, whereby rivers or river segments are evaluated for potential inclusion in the National System based their status as free flowing and possessing one or more outstandingly remarkable value (ORV). Section 16(b) of the WSRA defines “free-flowing” as “existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping or other modification of the waterway.” ORVs are river-related values or features considered unique, rare, or exemplary, and exceptional at a comparative regional or national scale. ORVs are classified as: scenic, recreational, wildlife, fish, cultural, historic, or subsistence resource values. The eligibility determination is an inventory and does not require a decision or approval document. Though jurisdictional or management constraints are not considered, only those values present on BLM-administered lands and related waters are applicable.
2. **Tentative classification (wild, scenic, or recreational).** The second phase of the study is the tentative classification of eligible rivers as wild, scenic, or recreational based on the condition of the river and adjacent lands as they exist at the time of the study. Criteria used in this classification include waterway development, shoreline modification, and access. This

classification also establishes management guidelines for the river or river segment until either a suitability determination or designation decision is reached. The three categories are defined as:

- **Wild River Areas:** Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.
 - **Scenic River Areas:** Those rivers or sections of rivers that are free of impoundments with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.
 - **Recreational River Areas:** Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.
3. **Suitability Analysis.** The third phase of the study, the suitability analysis, provides the basis for determining which rivers to recommend to Congress as potential additions to the National System.

The suitability analysis will address a series of questions aimed at evaluating the benefits and impacts of WSR designation, and what types of alternative protection measures for ORVs may be considered. The results of the suitability analysis are presented in two parts: (1) An objective description of attributes of the river corridor, and (2) a subjective evaluation of “suitability factors” (BLM 2012).

Attributes of the river corridor applicable to this study include (BLM 2012):

- Land ownership and land uses
- Mineral and energy resource activities
- Water resource development
- Transportation, facilities, and other development
- Recreation activities
- Other resource activities
- Special areas
- Socioeconomic environment
- Current administration and funding needs, if designated

The suitability factors evaluated as part of this study included the following (BLM 2012):

1. Characteristics that do, or do not, make the area a worthy addition to the National System. These characteristics (free-flow and ORVs) are described in the WSRA and may include additional factors.

2. The current status of land ownership and use in the area.
3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.
4. The federal agency that will administer the area should it be added to the National System.
5. The extent to which the agency proposes that administration of the river, including the costs thereof, is shared by State and local agencies.
6. The estimated cost to the United States of acquiring necessary lands or interests in land within the corridor, as well as the cost of administering the area should it be added to the National System.
7. A determination of the extent that other federal agencies, the state, or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the National System.
8. An evaluation of local zoning and other land use controls in protecting the river's ORVs and preventing incompatible development.
9. The State/local government's capacity to manage and protect the ORVs on non-federal lands. This factor requires an evaluation of the river protection mechanisms available through the authority of State and local governments. Such mechanisms may include, for example, statewide programs related to population growth management, vegetation management, water quantity or quality, or protection of river-related values such as open space and historic areas.
10. The existing support or opposition of designation. Assessment of this factor will define the political context. The interest in designation or non-designation by federal agencies; state, local, and tribal governments; national and local publics; and the state's congressional delegation should be considered.
11. The consistency of designation with other agency plans, programs, and policies in meeting regional objectives. Designation may help or impede the goals of tribal governments or other federal, state, or local agencies. For example, designation of a river may contribute to State or regional protection objectives for fish and wildlife resources. Similarly, adding a river that includes a scarce recreation activity or setting to the National System may help meet statewide recreation goals. Designation might, however, limit irrigation and/or flood control measures in a manner inconsistent with regional socioeconomic goals.
12. The contribution to river system or basin integrity. This factor reflects the benefits of a "systems" approach (e.g., expanding the designated portion of a river in the National System or developing a legislative proposal for an entire river system—headwaters to mouth—or watershed). Numerous benefits may result from managing an entire river or watershed, including the ability to design a holistic protection strategy in partnership with other agencies and the public.
13. The potential for water resources development. This factor requires identification of any proposed water resource projects that may be foregone, as designation may limit development of water resources projects as diverse as irrigation and flood control measures, hydropower facilities, dredging, diversion, bridge construction, and channelization.

The results of this suitability study will be a preliminary determination of suitability for inclusion in the National System. A final recommendation of suitability for inclusion in the National System will be made through the land use planning process.

2. Eligibility Determination and Preliminary Classification

This eligibility study inventoried 255 rivers and streams within the BSWI planning area for free-flowing qualities and the presence of one or more ORVs (Map 2-1). No rivers considered in the inventory were segmented because: (1) river conditions were consistent for the length of the system; (2) there were no major changes in the type or amount of development; and (3) resource values were considered reasonably consistent along each waterway.

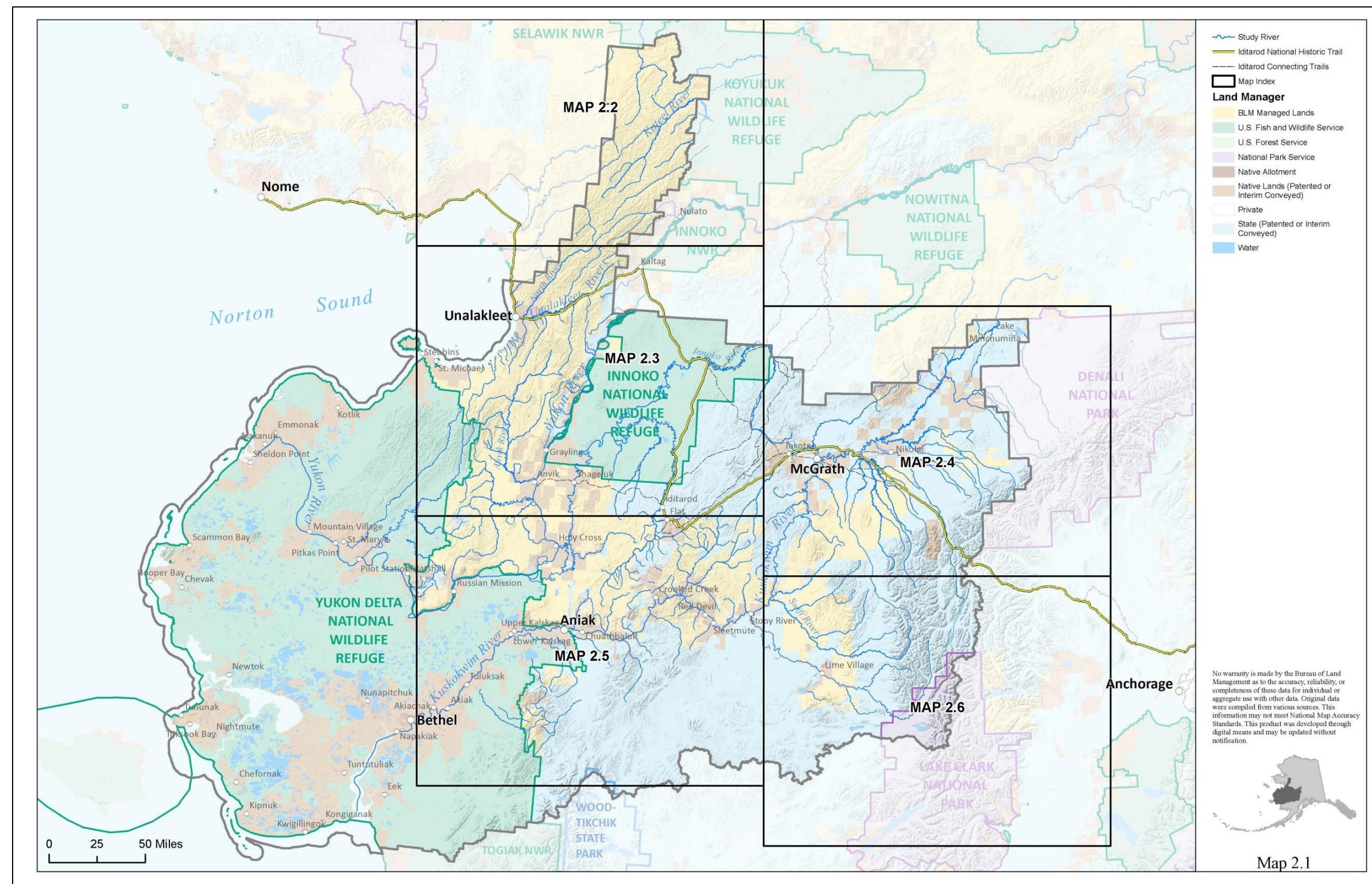
Waterbodies within the BSWI planning area were evaluated using a fixed-wing aircraft during the following periods in 2013: September 10-12, 15-18, and 25-27. Field reconnaissance was scheduled for the month of September, when leaf off begins to occur and the ground becomes more visible. Because all lands within the planning block are only accessible by aircraft, chartered fixed-wing aircraft was used to perform the inventory. Every flight day experienced good to exceptional flight weather, with no mechanical issues with the aircraft. Inventory work included Contour GPS High Definition cameras mounted to the outside and interior of the aircraft. To maintain organization and consistency, camera data and observations were downloaded, processed, analyzed, and recorded daily using Storyteller and Dashware computer software. Additional information used in this assessment drew from the extensive time that subject matter experts had spent in the planning area, and their institutional knowledge of this large geographic area.

It was determined that all study rivers met the “free-flowing” criteria. The ORVs, their evaluation criteria, and the “region of comparison” considered for this analysis is provided in Table A-1, Appendix A. The results of the eligibility study are provided in Table B-1, Appendix B.

A total of 18 waterways were found eligible for inclusion in the National System. The remaining 237 study rivers were found to be not eligible for inclusion in the National System. Section 3.2(2) of BLM Manual 6400 states that the study of rivers identified by the BLM under Section 5(d)(1) of the WSRA may be discontinued upon a finding of ineligibility; consequently, no further evaluation of these rivers was completed as part of this study.

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Map 2.1 Location of Study Rivers



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2.1 Waterbodies Considered Eligible for Inclusion in the National System

All 18 eligible waterways contained an ORV consisting of fish values. Bear Creek, the Salmon River, Sheep Creek, and Sullivan Creek had ORVs associated with history and recreation due to the presence of, and resources associated with, the Iditarod National Historic Trail (INHT). The Anvik River contained prehistory or cultural values, and Salmon River also possessed subsistence values (classified as “other”). These waterways were assigned a tentative classification of wild due to their pristine condition and remoteness. Table 1 summarizes eligible waterways and their identified ORVs. A narrative follows describing the eligibility determination, identified ORVs, and tentative classifications. Maps 2-2 through 2-6 illustrate the location of rivers evaluated for eligibility and the results of this determination.

Table 1 Summary of Eligible Waterways, Approximate Length, Outstandingly Remarkable Values, and Region of Comparison

Watercourse	Approximate Total Length (miles)	Approximate Length on BLM Lands (miles)	Outstandingly Remarkable Value(s)	Region of Comparison
Anvik River	150	119	Fish, Cultural	Yukon River
Bear Creek (Nikolai)	51	41	Fish, Historic	Kuskokwim River
Big River	137	35	Fish	Kuskokwim River
Blackwater Creek	67	12	Fish	Kuskokwim River
Canyon Creek	16	16	Fish	Yukon River
Middle Fork Kuskokwim River	131	52	Fish	Yukon River
North Fork Unalakleet River	48	48	Fish	Unalakleet River
Otter Creek (Anvik)	35	35	Fish	Yukon River
Otter Creek (Tuluksak)	27	5	Fish	Yukon River
Pitka Fork Middle Fork Kuskokwim River	92	62	Fish, Historic	Kuskokwim River watershed
Salmon River (Nikolai)	35	21	Fish, Historic	Regional. Iditarod National Historic Trail (INHT); Kuskokwim River
Sheep Creek	61	36	Fish	Kuskokwim River
Sullivan Creek	22	22	Fish; Historic	INHT; Kuskokwim River
Swift River (Anvik)	32	31	Fish	Kuskokwim River
Tatlawiksuk River	81	17	Fish	Kuskokwim River
Theodore Creek	15	15	Fish	Yukon River
Yellow River	72	70	Fish	Yukon River
Yukon River	1291	447	Cultural	Yukon River

2.1.1 Anvik River

River Segment Location: This waterbody crosses the BSWI Planning Area at S030N058W.

General Description: The Anvik River is a 150-mile tributary of the Yukon River. It flows southeast from the Nulato Hills to its mouth on the Yukon River, located approximately 1.5 miles north of the village of Anvik. The Anvik River is known to have excellent recreation and subsistence fishing for four species of salmon as well as northern pike, sheefish, Arctic char, and grayling. The summer chum salmon that spawn in the Anvik River are considered the largest single wild stock producer of summer chum salmon in the Yukon River Drainage (Bergstrom et al. 1999). The river is rated Class 1 (easy) on the International Scale of River Difficulty; about 121 miles is suitable for floating by open canoes, folding boats and kayaks, and inflatable canoes, and rafts. Floatplanes, riverboats, and wheeled airplanes can land on gravel bars to transport recreational boaters to McDonald Creek, near the headwaters. The Anvik River provides boat

access to federal lands that are important to local subsistence hunters during the fall moose hunting season.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: The annual production of summer chum salmon in the Anvik River is thought to be the largest in the Yukon River basin (Bergstrom et al. 1999). The spawning habitat quantity and quality contributes to this high production. The river has excellent fishing for four species of salmon (Chinook, chum, silver, and sockeye), as well as northern pike, sheefish, Arctic char, rainbow trout, and grayling. This lower section of the river is considered better fishing for northern pike than in the upriver sections. Sheefish are also available near the mouth and are best fished for in early June and September.

Cultural: This river corridor, which appears to provide important access and fishery resources suggest a moderate to high potential for the discovery of cultural resources in areas that have not previously been subject to pedestrian survey. Most areas with high potential for cultural resources are on the lower Anvik, and that includes some BLM lands. Known archaeological sites along the Anvik include UKT-00063, XHC-0070, XHC-00026, XHC-0025, XHC-0024, XHC-0023, XHC-0022, XHC-0021, XHC-0020, and XHC-0019. These sites are primarily historic Native Alaskan settlements and seasonal camps, and nearly all are located on non-BLM-managed public lands; rather, on Alaska Native village and corporation lands. There is also moderate potential to find resources in the area of the Upper Anvik closest to Norton Sound.

2.1.2 Bear Creek (Nikolai)

River Segment Location: This waterbody crosses the BSWI Planning Area at S032N028W.

General Description: Bear Creek (near Nikolai) is an approximately 51 mile, low-gradient, sinuous channel draining the low lands between the South Fork Kuskokwim River and Pitka Fork of the Middle Fork of the Kuskokwim River. The creek drains into the Pitka Fork of the Middle Fork of the Kuskokwim River. Generally located in the Kuskokwim Lowlands, this watercourse specifically is located between the Middle Fork of the Kuskokwim River and the South Fork of the Kuskokwim River and flows from the southeast to the northwest, following the slight gradient toward the main fork of the Kuskokwim River to the north. By Alaskan standards, this area is nearly flat and is dominated by water features: extensive wetlands interspersed with (and drained by) small rivers and streams, with a few lakes and upland forested areas. The waterway, while narrow (less than 20 feet wide), is relatively deep in some locations. The channel is characterized by extensive oxbows and sinuosity. The ADFG AWC identifies Chinook salmon rearing and white fish present in the creek.

There are no Alaska Native allotments or villages present along this segment. The village of Nikolai is approximately 19 air miles and 90 river miles to the north; residents use this segment for subsistence purposes. Overland travel also occurs on this segment for snowmobile access hunting and trapping where the INHT crosses the creek.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: Bear creek contains crucial Chinook salmon spawning and rearing habitat that provides outstanding remarkable value for fisheries habitat. Chinook salmon spawning and rearing habitat is identified in the ADFG AWC documenting a rare habitat through the Kuskokwim River for Chinook salmon.

Historic: Bear Creek overlaps with the Farewell Burn segment of the INHT and its associated cultural resources. The INHT was designated by Congress in 1978 to conserve the rich diversity of climate, terrain, wildlife, historic and recreation resources so contemporary users can duplicate the experiences of the past.

2.1.3 Big River

River Segment Location: This waterbody crosses the BSWI Planning Area at S033N030W.

General Description: Big River flows northwest from rugged terrain of the Western Alaska Range to the Middle Fork of Kuskokwim River, approximately 35 miles above McGrath, Alaska. The river measures approximately 137 miles. At its headwaters, the river is a glacial high-gradient river, as it flows out of the Alaska Range, it develops into a large braided river, eventually spreading out into a lower gradient river with high energy and material as it flows through BLM lands. After leaving BLM lands, the lower section of the river develops into a very sinuous, single channel lower gradient river where it meets the Middle Fork of Kuskokwim River.

The ADFG AWC lists Chinook, coho, and chum salmon spawning and rearing habitat present, humpback whitefish and white fish present, and sheefish spawning habitat present. The Big River accounts for the majority (approximately 80 percent) of all sheefish spawning in the entire Kuskokwim River drainage (Stuby, 2012). It is one of only four identified spawning areas for humpback whitefish in the Kuskokwim River system. The Big River is a substantial producer of Chinook salmon in the upper Kuskokwim River system.

Approximately 60 miles of the lower segment is used for travel, up to the point where the river braids out. Above this section, it is possible to boat with jet or airboats. Floating with airplane supported drop off in the upper and middle river is possible. Snowmobile and airplane ski travel on the river is common in winter for trapping and hunting.

There are no villages or Alaska Native allotments on the lower river. The closest village, McGrath, is about 35 river miles on the Kuskokwim from the mouth of the Big River. This segment is an important subsistence fishing area for sheefish for the villages of Nikolai and McGrath. It is also an important foraging area for brown bear. There are also recreational angling opportunities.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This is an important salmon spawning stream for Chinook and coho salmon. It is critically important spawning habitat for the Sheefish of the Kuskokwim River.

Approximately 80 percent of the Sheefish in the Kuskokwim River spawn in a 12 mile section of the Big River contributing to this ORV. It is also a foraging area for brown bear. This river contains crucial fish habitat.

2.1.4 Blackwater Creek

River Segment Location: This waterbody crosses the BSWI Planning Area at S033N030W.

General Description: Blackwater Creek is an approximately 67 mile low-gradient, highly sinuous creek flowing from the lowlands between the Big River and the Kuskokwim River. The upper portion of Blackwater Creek is on BLM lands. The ADFG AWC lists Chinook salmon spawning and rearing habitat and whitefish presence in the creek. The creek provides important spawning and rearing habitat for Chinook salmon.

Travel on this segment is unlikely by boat on the upper section near BLM lands, but winter over snow travel is highly likely. There are no villages or Alaska Native allotments along the segment. McGrath is 35 river miles away and would use this segment to fish, hunt, trap, and collect berries or firewood.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: Black Water Creek contains crucial spawning and rearing habitat for Chinook salmon. Chinook salmon spawning and rearing habitat is a rare and limited habitat in the Kuskokwim due to the limited number of clear fresh water creeks.

2.1.5 Canyon Creek

River Segment Location: This waterbody crosses the BSWI Planning Area at K026S011W.

General Description: Canyon Creek is an approximately 16 mile steep headwater stream that flows from rugged portions of the Nulato Hills south east into the Anvik River. It drops over 1,500 vertical feet in approximately 16 miles, draining from peaks greater than 2,000 feet to an elevation of less than 500 feet at its confluence with the Anvik River. The ADFG AWC identifies Chinook and chum salmon spawning and coho salmon and whitefish presence in the drainage.

The segment is not likely used for travel due to its steep gradient. As such, there are no villages or Alaska Native allotments present. The closest communities are Grayling and Anvik, approximately 120 river miles or 30 air miles away. It is likely that these communities would use the area for hunting and trapping.

Due to the remoteness of this segment, little else is known about it.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This creek contains crucial spawning and rearing habitat for Chinook, chum, and coho salmon. The spawning and rearing habitat in the Canyon Creek contribute to the overall production of the Anvik River which is considered the largest single wild stock producer of summer chum salmon in the Yukon River Drainage (Bergstrom et al. 1999).

2.1.6 Middle Fork Kuskokwim River

River Segment Location: This waterbody crosses the BSWI Planning Area at S033N030W.

General Description: The Middle Fork of the Kuskokwim River originates from the Western Alaska Range and flows northwest between the Big River to the south and the Pitka Fork of the Middle Fork of the Kuskokwim River to the north. North of the Alaska Range, this approximately 131 mile river drops into a low-gradient, highly sinuous river. The ADFG AWC identifies Chinook salmon, and sheefish spawning and coho and chum salmon presence. Spawning areas for sheefish and Chinook salmon are very important habitat and limited in quantity.

The terrain is rugged where the river flows from the Alaska Range but low gradient in the lower sections. It is very remote and would be considered rugged to traverse while walking.

The segment is used for travel by boat and snowmobile for hunting and trapping. There are approximately four Alaska Native allotments on the lower river. There are no villages along the segment, and Nikolai is the closest village (13 air miles). Nikolai would use this segment for access to subsistence fishing, hunting, and other forest product collection (berries, house logs, firewood).

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This river contains crucial spawning and rearing habitat for Chinook, coho, and chum salmon. The limited number of clear water rivers in the Kuskokwim River watershed makes the spawning and rearing habitat for Chinook salmon an important critical habitat.

2.1.7 North Fork Unalakleet River

River Segment Location: This waterbody crosses the BSWI Planning Area at K017S007W.

General Description:

The North Fork of the Unalakleet River is an approximately 48 mile river that flows out of the Nulato Hills south to the Unalakleet River that is designated wild. Most the river flows through

the Nulato Hills' rugged mountainous terrain. The ADFG AWC identifies Chinook, chum, and coho salmon spawning. Dolly Varden and whitefish are also listed as present. The river has documented important Chinook salmon spawning and rearing habitat that contributes to the productivity of the Unalakleet River. Motorized Boat travel is typically only possible for the first mile up river from the confluence with the Unalakleet River.

The topography is rugged in the upper reaches in the Nulato Hills with higher stream velocities and then transitions to reduced velocities and increased sinuosity in the lower section where it meets the wider valley bottom.

The segment is used for boat travel and winter snowmobile access for subsistence trapping and hunting. There are no Alaska Native allotments or villages present on it. The closest village is Unalakleet, which is 55 river miles downriver and would use this segment for access to subsistence fishing, hunting, and other forest product collection (berries, house logs, firewood).

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This river contains crucial spawning and rearing habitat for Chinook, coho, chum, and pink salmon and is located entirely within the existing and nominated Unalakleet River ACEC. Chinook salmon are an important subsistence species for the village of Unalakleet. This river flows into the Unalakleet River, a national designated “Wild” River 15 to 20 miles above the confluence with the North River.

2.1.8 Otter Creek (Anvik)

River Segment Location: This waterbody crosses the BSWI Planning Area at K026S011W.

General Description: Otter Creek is an approximately 35 mile creek that flows into the Anvik River through the southern Nulato Hills from higher elevations. This segment is not used for travel, as only the lower portions are navigable by boat. There are no Alaska Native allotments or villages present and the closest village is Anvik, approximately 40 miles by air. The village would use this segment for access to subsistence hunting of moose in fall and winter.

Due to the remoteness of this water segment, little else is known about it.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This creek contains crucial spawning and rearing habitat for Chinook, chum, and coho salmon. The annual production of summer chum salmon in the Anvik River is thought to be the largest in the Yukon River basin (Bergstrom et al. 1999) and this Otter Creek tributary to the Anvik also contributes salmon habitat that supports the Anvik River

chum population. Such spawning habitat quantity and quality contributes to this high production.

2.1.9 Otter Creek (Tuluksak)

River Segment Location: This waterbody crosses the BSWI Planning Area at S009N060W and S009N061W.

General Description: Otter Creek (Tuluksak) is an approximately 27 mile river located 28 river miles upstream of the village of Tuluksak. It is tributary to the Tuluksak River with its headwaters in the 2,500-foot-high Kilbuck Mountains, dropping to an outlet elevation of about 150 feet at its confluence with the Tuluksak River. It is approximately 20 miles long. Approximately 6 miles of it are through BLM-managed lands, with the remainder managed by the United States Fish and Wildlife Service (USFWS). There are no Alaska Native patented lands along its length. Otter Creek's first 5 miles of BLM headwater reaches are rugged and steep. It then transitions to a meandering system.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: The ADFG AWC identifies that this creek contains crucial coho and Chinook salmon rearing and coho spawning habitat. These salmon species and habitat found in Otter Creek contribute to the fisheries production in the Tuluksak River. The USFWS has operated a weir on the Tuluksak River to monitor escapement for all five species of salmon from 1991 to 1994 and 2001 to 2017. When a river is chosen as a site for a weir, it indicates that the fish runs are significant enough to determine whether escapement goals have been met for a larger, connected river and serves as an index to determine run strength over time.

2.1.10 Pitka Fork Middle Fork Kuskokwim River

River Segment Location: This waterbody crosses the BSWI Planning Area at S033N029W.

General Description: The Pitka Fork Middle Fork Kuskokwim River is an approximately 92 mile, low-gradient, sinuous drainage that develops between the Middle Fork Kuskokwim River and the South Fork of the Kuskokwim River from low hills west of the Alaska Range and flows to the Middle Fork Kuskokwim River. It is a low-gradient, sinuous river flowing through muskeg lowlands. The ADFG AWC identifies Chinook and chum salmon spawning habitat with coho, sheefish, and whitefish presence in the river. The Pitka Fork is an important producer of Chinook salmon in the upper Kuskokwim River, and there are several other identified eligible rivers that drain into the Pitka Fork.

The segment is used for travel by boat and snowmobile. There are nine Alaska Native allotments present, and no villages along the segment. The closest village is Nikolai, 10 air miles away, and this village would use this segment for access to subsistence fishing, hunting, and other forest product collection (berries, house logs, firewood).

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: The Pitka Fork contains crucial fish spawning and rearing habitat for Chinook, coho, and chum salmon. Sheefish have also been documented to spawn in the Pitka Fork, one of only four known sheefish spawning areas in the Kuskokwim River providing a unique and rare fish habitat for sheefish (Stuby, 2012).

Historic: This area contains several known historic resources, including historic cabins and two INHT connecting trail segments. Sites include: MCG-126, the Salmon River-McGrath Trail (INHT); MCG-0018, the Pitka Fork CAA/FAA cabin; MCG-0020, the Sheep Creek Cabin; and MCG-00127, the Pitka Fork Loop Trail (INHT).

2.1.11 Salmon River (Nikolai)

River Segment Location: This waterbody crosses the BSWI Planning Area at S032N028W.

General Description: The Salmon River is an approximately 35 mile river originating between the lowlands of the South Fork of the Kuskokwim River and the Pitka Fork of the Middle Fork of the Kuskokwim River. It is mainly a single channel, low-gradient river. The ADFG AWC identifies Chinook, coho, chum salmon spawning habitat and rearing habitat for Chinook and coho salmon. It also identifies presence of sheefish and whitefish. The Salmon River provides unique and rare spawning habitat for salmon.

Located in the physiographic province known as the Kuskokwim Lowlands, this watercourse generally flows from the southeast to the northwest, following the slight gradient toward the main fork of the Kuskokwim River to the north. By Alaskan standards, this area is nearly flat and is dominated by water features: extensive wetlands interspersed with (and drained by) these small rivers and streams, with a few lakes and upland forested areas. The waterways, while relatively narrow (less than 20 feet wide), may be relatively deep and exhibit extensive oxbows and sinuosity.

The river was historically accessed by canoe and is currently accessed by motor boat and jet boat, and in winter by snowmobile and sled-dog team. Local Nikolai residents run a sled dog team through here to access a trap line on the foothills of the Alaska Range and to provide maintenance to the INHT.

There are several Alaska Native allotments present at the confluence of Salmon River and Pitka Fork. The confluence is also the location of the remains of Salmon River Roadhouse, a historic site on the INHT, and an important fish camp for Nikolai area residents. There are no villages along the Salmon River. Nikolai is 6 miles by air or 10 miles overland on winter trail (INHT) and approximately 30 miles by river in summer. Nikolai residents use this area for subsistence fishing, hunting, and other forest product collection (berries, house logs, firewood), both in summer and winter. The INHT and the associated Salmon River Roadhouse are nationally important cultural resources.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This river contains crucial spawning and rearing habitat for Chinook, coho, and chum salmon. The Salmon River was historically one of the two best locations for subsistence gathering of Chinook salmon in the region by residents of the village of Nikolai, and is significantly closer than the other important site (which is west of the town of McGrath).

Historic Resources: Historic use at the confluence of the Pitka Fork has been documented for upper Kuskokwim-area residents. The confluence is the site of the remains of a roadhouse, fish camp, and potential archaeological site at the confluence of Salmon River and Pitka Fork, and is located on the primary route of the INHT, which on BLM lands is designated National Conservation Land. The INHT was designated by Congress in 1978 to conserve the rich diversity of climate, terrain, wildlife, historic and recreation resources so contemporary users can duplicate the experiences of the past.

2.1.12 Sheep Creek

River Segment Location: This waterbody crosses the BSWI Planning Area at S031N028W.

General Description: Sheep Creek is an approximately 61 mile, low-gradient, highly sinuous creek originating in the lowlands of the upper Kuskokwim River between the South Fork and Middle Fork of the Kuskokwim River. The ADFG AWC identifies the presence of Chinook and coho salmon.

Generally located in the Kuskokwim Lowlands, this watercourse specifically is located between the Middle Fork of the Kuskokwim River and the South Fork of the Kuskokwim River, and flows from the southeast to the northwest, following the slight gradient toward the main fork of the Kuskokwim River to the north. By Alaskan standards, this area is nearly flat and is dominated by water features: extensive wetlands interspersed with (and drained by) small rivers and streams, with a few lakes and upland forested areas. The waterways, while relatively narrow (less than 20 feet wide), are relatively deep in some locations and exhibit extensive oxbows and sinuosity.

The segment is not likely used for boat travel, but is along the INHT, and snowmobile and other winter methods of travel may be used. There are no Alaska Native allotments present and no villages along the segment. The closest village, Nikolai, is 18 air miles to the north and would use this segment for access to subsistence resources such as fishing, hunting, and other forest product collection (berries, house logs, firewood) in fall and winter.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This creek contains crucial rearing habitat for Chinook and coho salmon. The clear water habitat of Sheep Creek provides important habitat for these species both an important subsistence resource for communities of the Kuskokwim River.

2.1.13 Sullivan Creek

River Segment Location: This waterbody crosses the BSWI Planning Area at S031N027W.

General Description: Sullivan Creek is an approximately 22 mile, low-gradient, sinuous creek that drains the area between Bear Creek and Sheep Creek and flows into the Pitka Fork of the Middle Fork of the Kuskokwim River. The ADFG AWC lists Chinook salmon spawning and rearing with whitefish present. It is an important creek for Chinook spawning habitat.

Topography in the area is relatively gentle. The landscape is dominated by water features: extensive wetlands interspersed with (and drained by) small rivers and streams, with a few lakes and upland forested areas. The waterways, while relatively narrow (less than 20 feet wide), are relatively deep in some locations and exhibit extensive oxbows and sinuosity.

The segment is likely not used for boat travel, and there are no villages present. Nikolai is 15 air miles away and would use this segment for access to subsistence resources fishing, hunting, and other forest product collection (berries, house logs, firewood), especially in fall and winter.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this creek is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This creek contains crucial spawning and rearing habitat for Chinook salmon. The ADFG AWC identifies Sullivan Creek Chinook spawning and rearing habitat present in this clear water creek a rare and unique resource throughout the Kuskokwim River watershed.

Historic: The route of the INHT, established in the early 1900s, crosses Sullivan Creek approximately midway between its headwaters and its confluence with MCG-00127, the Pitka Fork. The remains of a historic trail roadhouse and other associated structures are present at Loop Trail. Site MCG-0014, the Sullivan Roadhouse, is also located slightly downstream from the current day trail crossing of the creek on this river and along the related INHT segment.

2.1.14 Swift River (Anvik)

River Segment Location: This waterbody crosses the BSWI Planning Area at K028S011W.

General Description: This is a major tributary to the Anvik River. It flows east out of the rugged Nulato Hills and has a steep gradient. The ADFG AWC identifies Chinook, coho, and chum salmon spawning habitat in the area, as well as presence of whitefish. The ADFG Fresh Water Inventory identifies presence of Dolly Varden and slimy sculpin.

It is likely that the segment is used for travel by boat at the lower end and snowmobile for trapping and hunting. There are no Alaska Native allotments or villages present along this segment.

Due to the remoteness of this water segment, little else is known about it.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: The Swift River is identified to have Chinook, coho, and chum spawning and rearing habitat, a unique resource within this watershed. Habitat for these species and particularly chum salmon contributes to chum production in the Anvik River being considered the largest single wild stock producer of summer chum salmon in the Yukon River Drainage (Bergstrom et al. 1999).

2.1.15 Tatlawiksuk River

River Segment Location: This waterbody crosses the BSWI Planning Area at S025N033W.

General Description: The Tatlawiksuk River flows southeast from low hills east of the Kuskokwim River and south of the Big River. It is a low-gradient, very sinuous river in the upper watershed and develops into a steeper gradient river on the lower portion where it meets several additional major confluences. The ADFG AWC identifies Chinook, coho, and pink spawning habitat and presence of sockeye and chum salmon, as well as humpback whitefish. The ADFG Fresh Water Inventory identified Arctic grayling, Arctic-Alaskan brook lamprey, longnose sucker, norther pike, sculpin, and round whitefish present in the river. ADFG operates a weir for Chinook salmon escapement on the river, which is a major producer of middle Kuskokwim River Chinook salmon. When a river is chosen as a site for a weir, it indicates that the fish runs are significant enough to determine whether escapement goals have been met for a larger, connected river and serves as an index to determine run strength over time. The upper watershed is in low elevation hills with vegetation throughout. It is not rugged terrain as compared to mountains but is a very rugged terrain to walk through as it has dense vegetation along the riparian areas. Portions of the segment are used for boat travel and winter snowmobile travel for trapping and hunting.

There are four Alaska Native allotments present on the lower river and no villages present. Stoney River is 12 miles downstream of the mouth on the Kuskokwim River. Stoney River residents would use this segment for access to subsistence resources fishing, hunting, and other forest product collection (berries, house logs, firewood).

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: The Tatlawiksuk River is a tributary of the Kuskokwim River has a significant population of Chinook salmon that contributes to the production of the middle Kuskokwim River. ADFG operates an index weir on the river to identify the middle Kuskokwim River escapement of Chinook salmon. When a river is chosen as a site for a weir, it indicates that the fish runs are significant enough to determine whether escapement goals have been met for a larger, connected river and serves as an index to determine run strength over time. Important spawning habitat for Chinook, chum, and coho, salmon is identified in the ADFG AWC. The important spawning and rearing habitat of the Tatawiksuk River produces Chinook, coho, and chum salmon, which contribute to subsistence and commercial salmon fisheries of the Kuskokwim River

2.1.16 Theodore Creek

River Segment Location: This waterbody crosses the BSWI Planning Area at S031N061W.

General Description: Theodore Creek is an approximately 15 mile tributary to the Anvik River. It is a medium-gradient river flowing east from small hills. The ADFG AWC identifies Chinook and chum salmon presence in the creek. The topography is somewhat rugged but not mountainous. The segment flows from an elevation of 500 feet to 150 feet, where it meets the Anvik River.

The segment is not used for travel. There are no Alaska Native allotments present on the segment, but there is one just above and below on the Anvik River. There are no villages on the segment. The closest village is Anvik, 17 air miles and 40 river miles away. Anvik residents would use this segment for access to subsistence resources fishing, hunting, or other forest product collection (berries, house logs, firewood). Due to the remoteness of this water segment, little else is known about it.

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This creek contains habitat for Chinook and chum salmon. The ADFG AWC identifies the presence of Chinook and chum salmon which contribute to the population of chum salmon in the Anvik River considered the largest single wild stock producer of summer chum salmon in the Yukon River Drainage (Bergstrom et al. 1999). There is no specific habitat identified in the ADFG AWC for critical habitat.

2.1.17 Yellow River

River Segment Location: This waterbody crosses the BSWI Planning Area at K027S008W.

General Description: The Yellow River is a major tributary to the Anvik River. The river measures approximately 72 miles, and is characterized as a low-gradient, sinuous river in the valley bottoms. It has some higher gradient areas near Nulato Hills, where it originates. The

ADFG AWC identifies Chinook, coho, and chum salmon spawning in the river and in much of the headwater streams, with whitefish listed as present.

This segment flows through rugged terrain where it drains from the Nulato Hills but is much more gradual once it meets the valley bottom. The lower portion of the segment is possibly used for travel. There are Alaska Native allotments present; one above and one just below the confluence with the Anvik. There are no villages along the segment. The closest village, Anvik, is 23 air miles and over 80 river miles away. Anvik residents would use this segment for access to subsistence resources or fishing, hunting, and other forest product collection (berries, house logs, firewood).

Reasons for Tentative Classification: Per Section 2 of the WSRA, this river is tentatively classified as “Wild” because it is “free of impoundments and generally inaccessible except by trail, with watersheds or shoreline essentially primitive and waters unpolluted.”

Description of Outstandingly Remarkable Value(s):

Fish: This river contains crucial spawning and rearing habitat for Chinook, chum, coho, and pink salmon. Yellow River spawning and rearing habitat for chum salmon provides an important habitat for the production of chum salmon which contribute to the Anvik River which is considered the largest single wild stock producer of summer chum salmon in the Yukon River Drainage (Bergstrom et al. 1999).

2.1.18 Yukon River

River Segment Location: This waterbody crosses the BSWI Planning Area in the following locations: K017S001W, K018S001W, K018S002W, K018S003W, K022S004W, K023S004W, K023S005W, K024S004W, K024S005W, K025S005W, K025S006W, K026S005W, K026S006W, K027S006W, K028S006W, K029S006W, K029S007W, S022N059W, S022N060W, S022N061W, S022N062W, S023N057W, S023N058W, S025N057W, S025N058W, S026N058W, S027N058W, S028N058W, S028N059W, and S031N057W.

General Description: The Yukon River is a major watercourse of northwestern North America. The source of the river is located in British Columbia, Canada. The next portion lies in, and gives its name to, Yukon. The lower half of the river lies in the U.S. State of Alaska. The river is 1,291 miles long and empties into the Bering Sea at the Yukon-Kuskokwim Delta.

This is the longest river in Alaska and Yukon, and it was one of the principal means of transportation during the 1896–1903 Klondike Gold Rush. Paddle-wheel riverboats continued to ply the river until the 1950s, when the Klondike Highway was completed. After the purchase of Alaska by the United States in 1867, the Alaska Commercial Company acquired the assets of the Russian-American Company and constructed several posts at various locations on the Yukon River.

The Yukon River has had a history of gold mining, military installations, dumps, wastewater, and other sources. However, the Environmental Protection Agency does not list the Yukon River among its impaired watersheds, and water quality data from the U.S. Geological Survey shows relatively good levels of turbidity, metals, and dissolved oxygen.

Despite its length, there are only four vehicle-carrying bridges across the river. The closest crossing is the Yukon River Bridge, north of Fairbanks on the Dalton Highway.

The Yukon River is home to one of the longest salmon runs in the world. Each year Chinook, coho, and chum salmon return to their terminal streams in Alaska, the Yukon Territories, and British Columbia.

The villages along the Yukon have historically and continue to rely on salmon for their cultural, subsistence, and commercial needs. The Yukon River provides an outstanding array of recreational opportunities including historical sightseeing, wildlife watching, hunting, fishing, hiking, camping, boating, and paddling in an exceptionally scenic setting. The river provides access to spectacular and diverse scenery unique to the interior arctic region.

The BLM manages approximately 6 percent of the uplands along this entire river, with the remaining consisting of state- and Alaska Native-owned parcels. The lower sections of this river near Holy Cross have been asserted as navigable by BLM. The sections studied include four non-contiguous sections of the Yukon River, that total 13.24 miles. Three segments are located downriver of Anvik and upriver of Holy Cross and the fourth is located downriver of Holy Cross. There is no local interest in WSR designation and management. Visitor use on this river is moderate for this region of Alaska.

In 1993, the National River Inventory (NRI) listed 128 miles of this river (upstream preserve boundary near Calico Bluffs to downstream preserve boundary near Circle) to be potentially classified as Wild and Scenic and containing the ORV of Geologic, Wildlife, and Historic. Historic sites found along the river that is associated with the gold rush era on Yukon River. Geologic features show strata of Precambrian era, consisting of 700 million year old marine fossils.

Reasons for Tentative Classification: This river is tentatively classified as “Recreation” based on the level of shore developments being minor and road accessible near villages along the river. Shore development along this major river will likely continue as population increases. The Yukon River provides an outstanding array of recreational opportunities including historical sightseeing, wildlife watching, hunting, fishing, hiking, camping, boating, and paddling in an exceptionally scenic setting. The river provides access to spectacular and diverse scenery unique to the interior arctic region.

Description of Outstandingly Remarkable Value(s):

Background: BLM (2015) was identified the Yukon River as having an ORV for fish and cultural resources. Both ORVs have been revised and removed. Part of this decision was based on similar findings to the Yukon River study conducted under Section 604 of the ANILCA and had considerations pertinent to this reconsideration (Draft Wild and Scenic River Study Yukon River Ramparts Section, 1983). The location of this river section was between the Dalton Highway bridge crossing over the Yukon, and continued to just upriver of the village of Tanana. The 1983 study indicated that fish and cultural values were examined but determined to be an ORV. The study team included multiple federal agencies, Doyon Ltd. (Regional Corporation), Tanana Chiefs Conference, and other State and local agencies (1983). The draft (1983) and Final (1984) Yukon River study report documented that the river segment was not suitable for the national

system. The study determined that since little or no land within the river section was anticipated to remain in federal ownership after land conveyances were made and that neither the State nor Native Corporations favored designation, it was not suitable.

Similar to the findings presented in the Ramparts section study, further specialist review indicated although salmon species are important (and the entire river supports one of the longest salmon migrations in the world), the fisheries ORV was over-emphasized in BLM (2015). These sections of the Yukon do not contain distinctly different or special habitat supporting salmon species and many other rivers in the region support similar anadromous fisheries. Although the river is a major pathway for migrating fish, the habitat is not considered exceptional and sportfishing was noted to be limited to the tributaries and not exceptional (1983).

Additionally, the area's rich cultural heritage was determined to be evident with people living along the river that pursue many traditional activities and maintain close ties with one another. The river serves as a water highway, tying people together physically and culturally. However, the same phenomenon is true of the entire Yukon River and other rivers in the region. Consequently, this section was not found to contain unique cultural resource values.

History: In the 1983 Draft Wild and Scenic River Study Yukon River Ramparts Section, the study team arrived at the following conclusions:

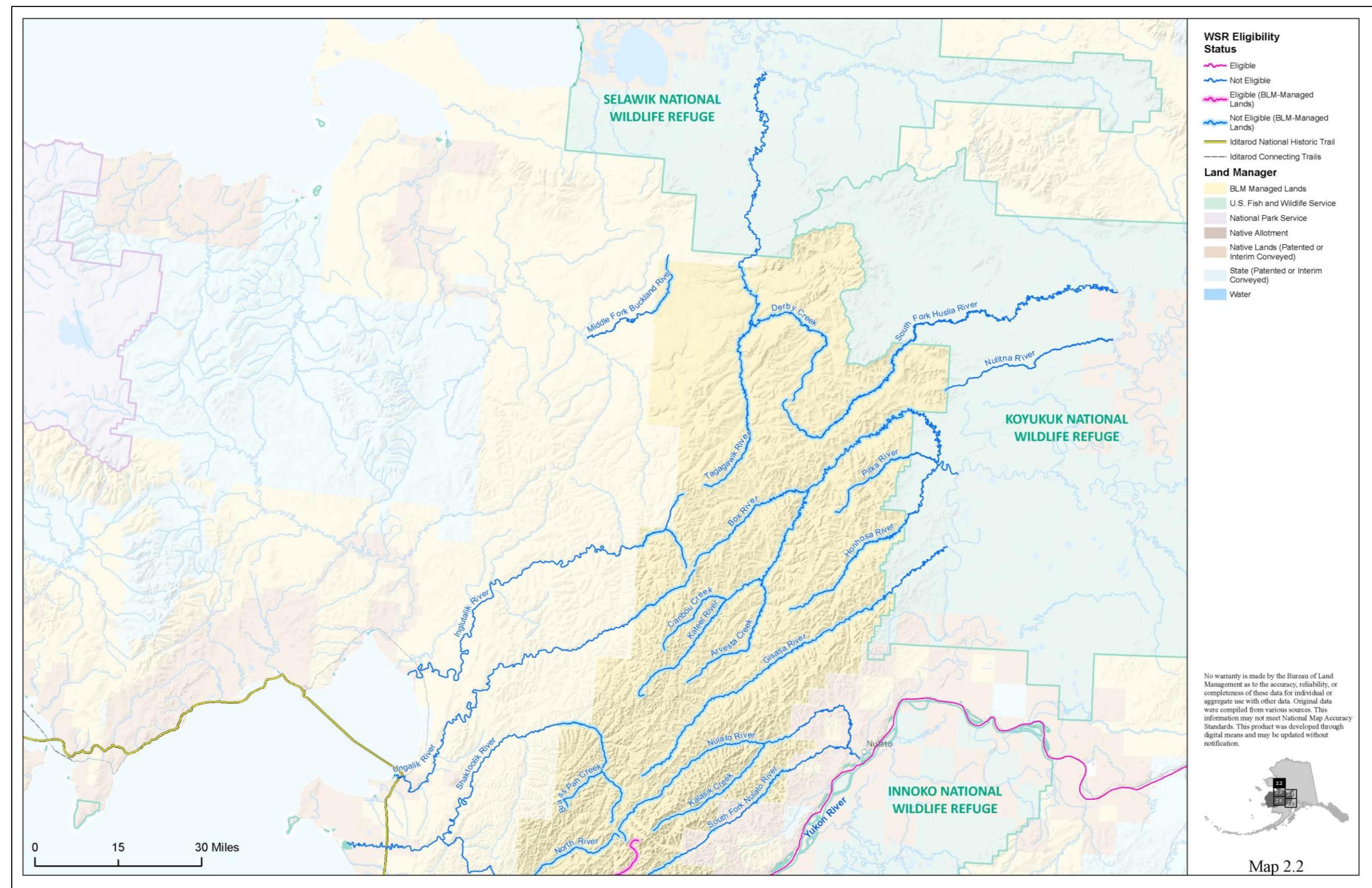
“... study team concluded that the river segment's one outstandingly remarkable value is its history. The entire Yukon River, including the Ramparts section, has served, and continues to serve, as a significant transportation corridor. Because of its usefulness as a transportation corridor, the Yukon River was the center of events associated with the settlement and development of interior Alaska and the Yukon Territory.”

Additionally,

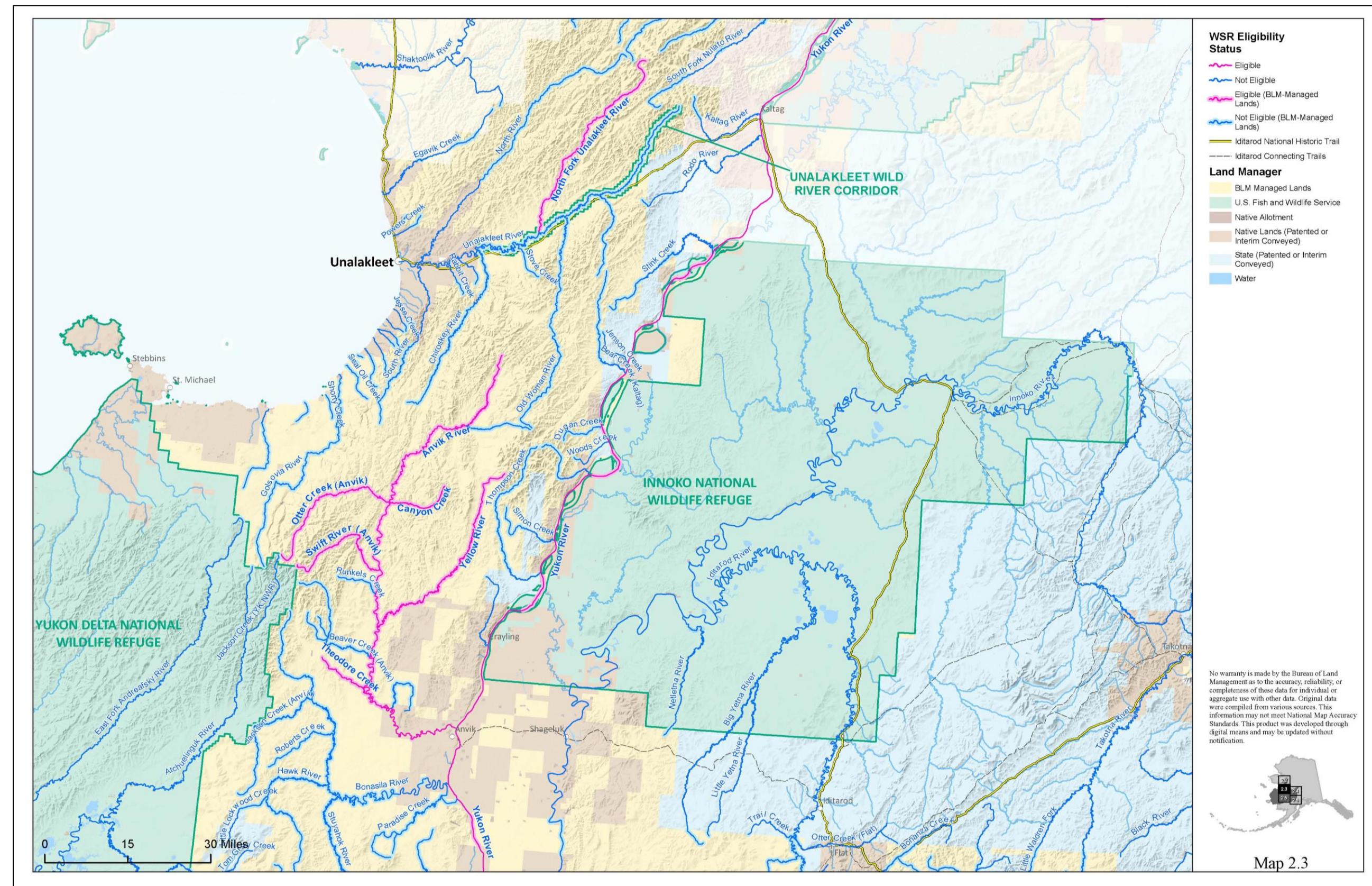
“The Ramparts section is an outstanding demonstration of the historic role of the Yukon River. Most of the river corridor appears today as it did during white man's entry into the area. The historic gold rush era village of Rampart sits on the bank of the river. Other notable historic places include the site of the village of Chief Senatis (a prominent Native leader of the late 1800s) and The Rapids, 11 which marks the generally accepted boundary between the influence and activity of the Russian fur traders and the Hudson Bay Company. Activities along the river, including the use of fishwheels, contribute to the historic value of the area.”

Based on this review, and the applicability of this ORV to the Yukon, this study also finds the Yukon River to be eligible for inclusion in the National System.

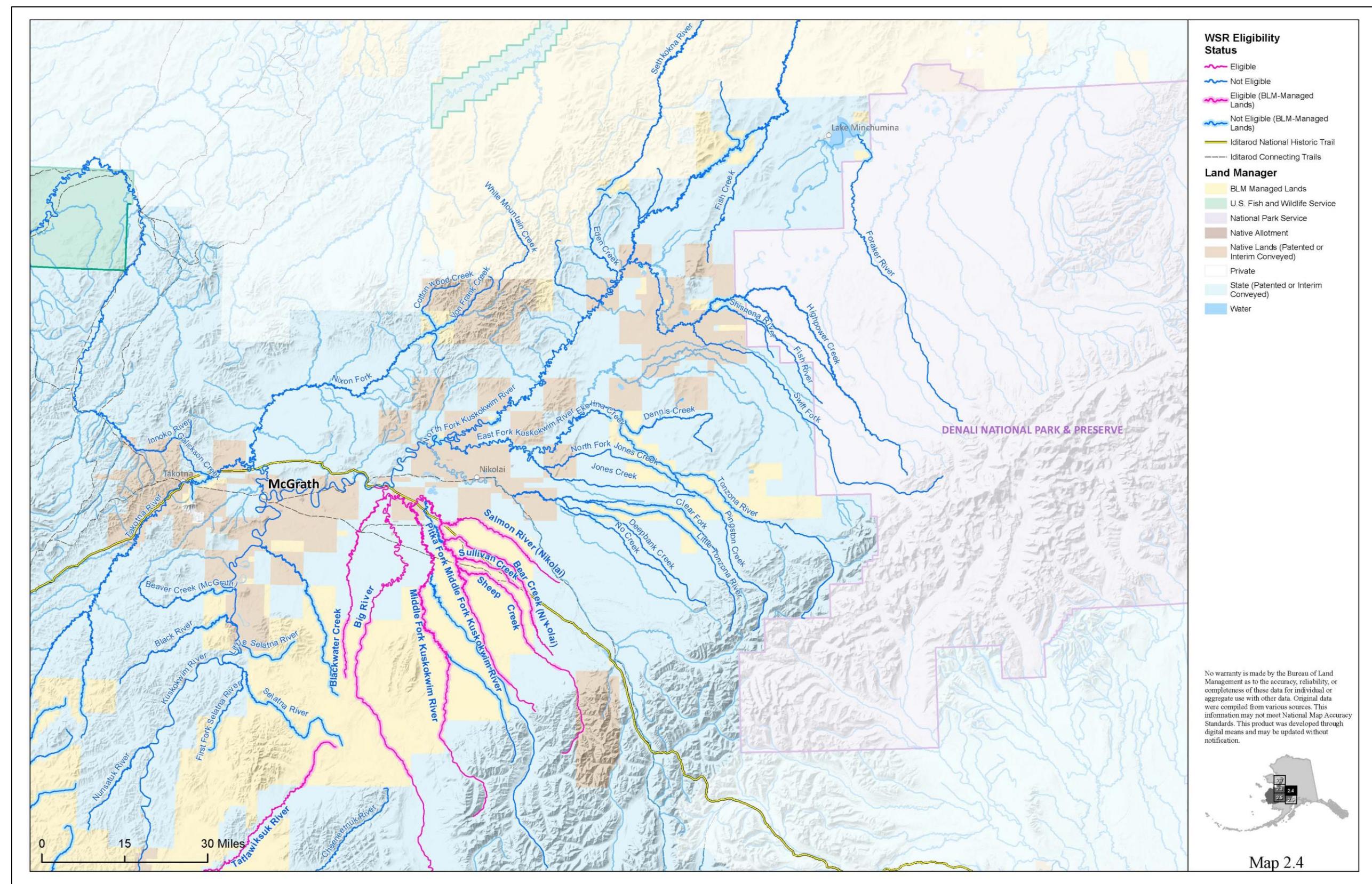
Map 2.2 Location of Study Rivers, including Eligibility Determination



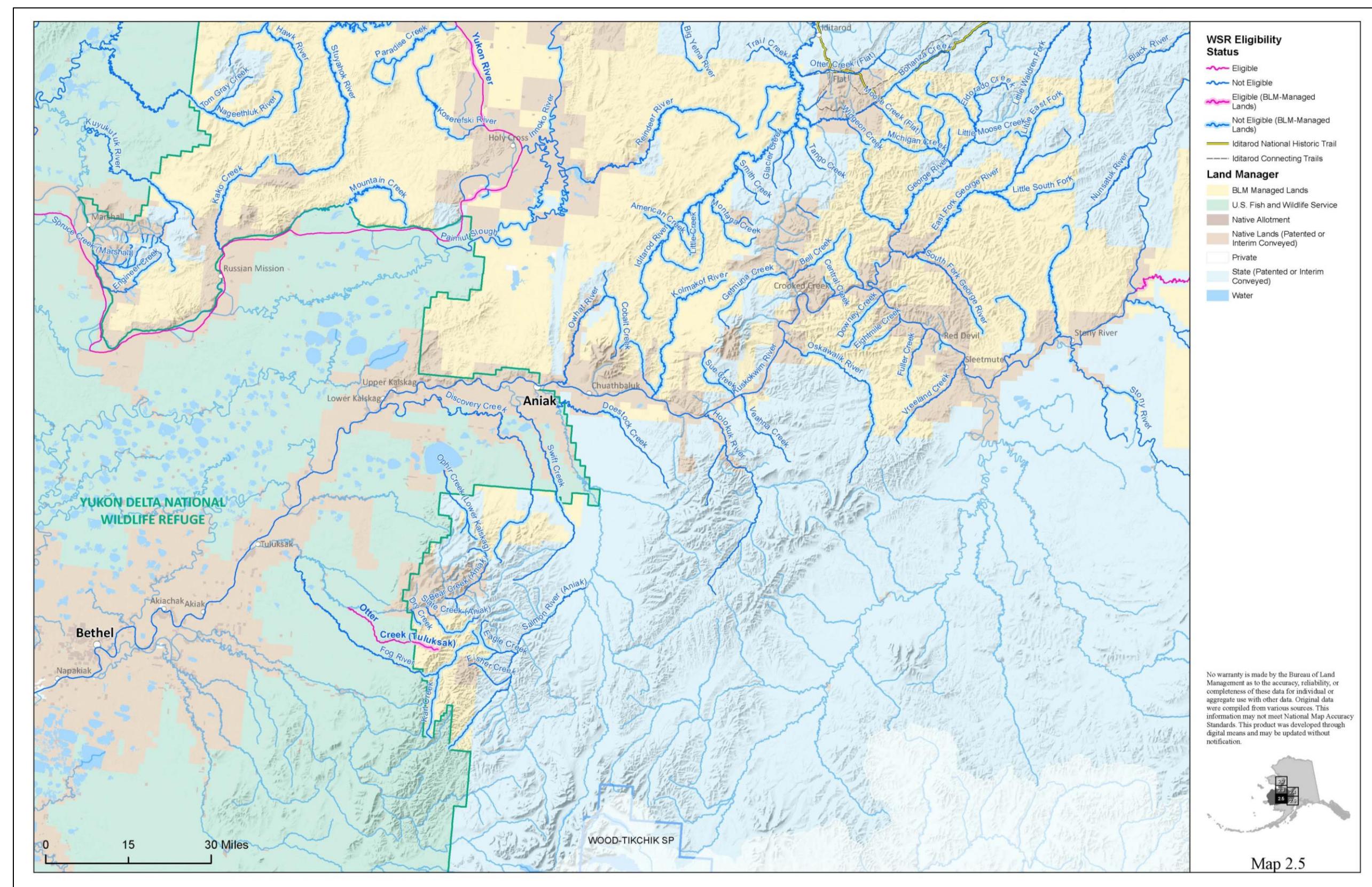
Map 2.3 Location of Study Rivers, including Eligibility Determination



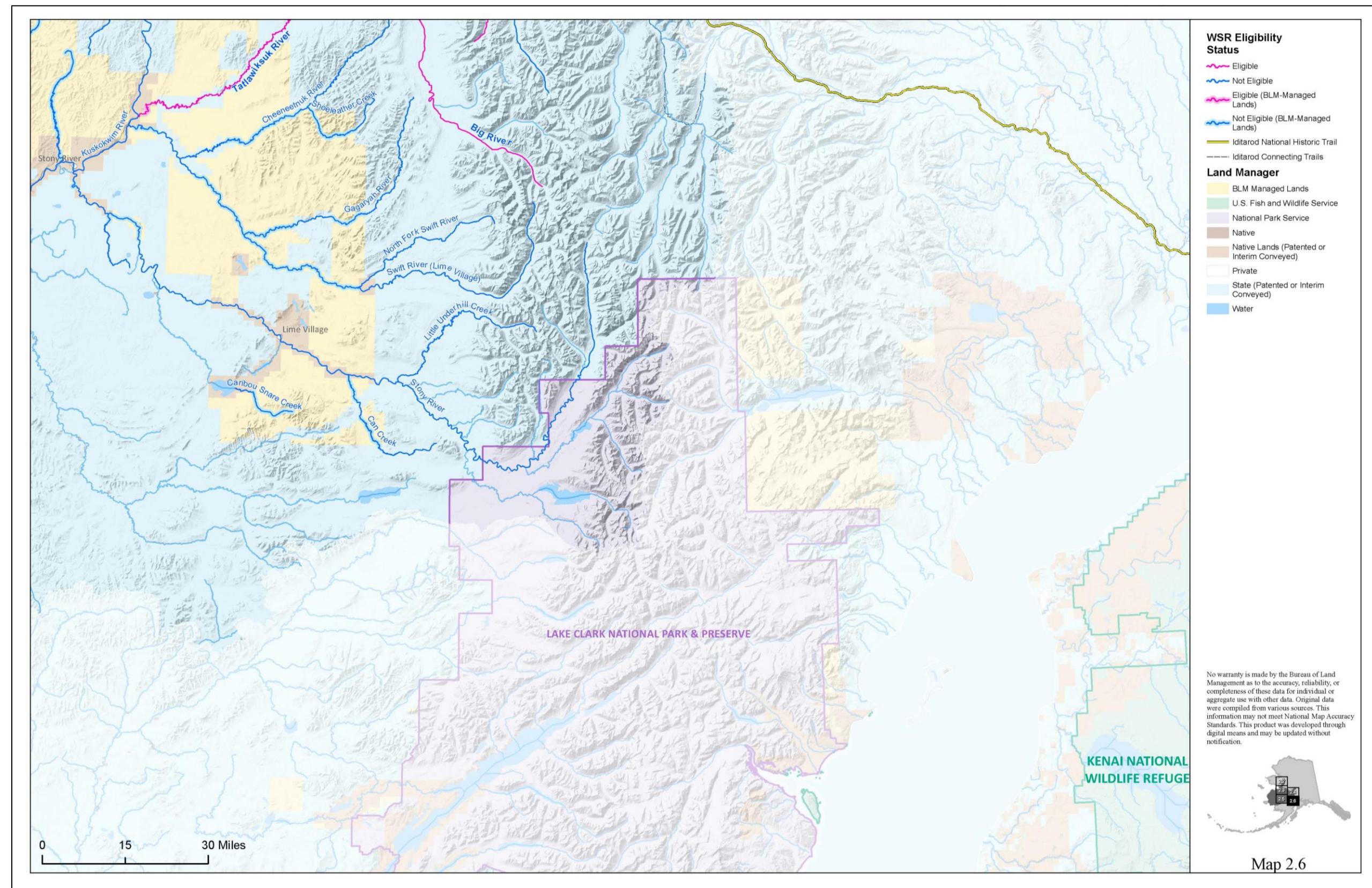
Map 2.4 Location of Study Rivers, including Eligibility Determination



Map 2.5 Location of Study Rivers, including Eligibility Determination



Map 2.6 Location of Study Rivers, including Eligibility Determination



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3. Suitability Assessment

Preliminary Suitability Determinations for each eligible river are provided below. The goal of this suitability assessment is to gather sufficient information, through the evaluation of suitability factors, to answer the following questions:

- Should the river's free-flowing condition, water quality, and ORV be protected, or are one or more other uses important enough to warrant doing otherwise?
- Will the river's free-flowing condition, water quality, and ORV be protected through designation?
- Is designation the best method for protecting the river corridor?
- Is there a demonstrated commitment to protect the river by any non-federal entities that may be partially responsible for implementing protective management?

3.1 Suitability Factors

As described in Section 1.2, the suitability evaluation considered objective attributes of the river and the 13 “suitability factors” provided by BLM (2012). Several objective criteria and suitability factors summarized below were shared across all rivers.

3.1.1 Objective Attributes Shared Across Eligible Rivers

Several objective attributes were shared across all eligible rivers studied and are summarized below:

- **Water Resources Development.** No water resources development currently exists in any eligible river that would affect the river's free-flowing condition. All eligible rivers were considered to have a low potential for hydroelectric development based on their remoteness and lack of electric transmission infrastructure. No historic or current preliminary Federal Energy Regulatory Commission Permits or license applications exist on any eligible river during the time of this suitability assessment.
- **Current Administration and Funding Needs, if Designated.** It is assumed that additional funding would be required to manage any of the eligible rivers as a WSR. The management of an additional WSR special designation would require funds to support aviation access to the remote location for surveys if the river segment is not easily accessible by motor boat. The BLM Anchorage Field Office (AFO) currently stages watercraft on the Yukon River in Holy Cross and on the Kuskokwim River in McGrath. These watercraft are used by multiple programs to access and monitor resources on the limited BLM lands adjacent to the main stems of both rivers as well as access navigable tributaries that are more likely adjacent to BLM lands. River travel opportunities are highly variable due to water, weather, and ice conditions and missions are frequently scrubbed after extensive planning for these reasons. In addition, fuel is extremely expensive in remote river villages and is sometimes completely unavailable. A minimum of two BLM employees are required for all field missions.

Watercraft are generally not the most efficient means of traveling to field office lands due to the sinuosity of most Alaskan rivers and the vast distances that must be navigated to

access most BLM lands and waterways. Snow machines are a much more efficient means for river travel and monitoring as they can cut off the bends of a watercourse with brief intervals of overland travel, greatly reducing the time and mileage associated with reaching ACECs, WSRs and other AFO lands. Although it may be easier to access a WSR or field work site under winter river conditions, the work that can be conducted is limited and generally doesn't provide the monitoring opportunities and data that a non-snow season visit provides.

Aircraft, both helicopters and fixed wing, are the most reliable means of conducting field work associated with WSR work, but these modes also are also frequently impacted by weather delays and river conditions. Similar to watercraft, complex planning and logistics are required to insure that fuel is available to reach and return from field work mission sites with adequate safety margins.

All personnel conducting field work and monitoring on remote AFO lands must first travel to hub villages by seat fare or charter to access their staged snow machines, aircraft, or watercraft and then travel additional distances to their field work sites. Field personnel also carry scientific instruments, communications equipment, and survival gear on all missions, much of which must be packaged and pre-shipped as cargo to hub villages in advance of the mission, and repackaged and shipped back to Anchorage at the end of the mission. Seat fares, charters, fuel, per diem, shipping costs, etc. add up quickly, greatly reducing the amount of work we can do on limited program operations funds.

3.1.2 Suitability Criteria Considered for all Eligible Rivers

The following information on reasonably foreseeable future actions, existing management provisions, ownership of submerged lands, and public support for inclusion of eligible rivers in the National System was considered in the assessment of suitability factors for all eligible rivers. Background information on each of these factors is provided below, and addressed on a case-by-case basis for each eligible river.

Reasonably Foreseeable Potential Future Uses

The extent to which reasonably foreseeable future uses are enhanced, curtailed, or foreclosed are considered in the suitability assessment. Reasonably foreseeable future uses considered in this suitability analysis included:

- **Areas of Leasable, Locatable/Saleable Mineral development.**
- **The proposed Donlin Gold Project.** The proposed Donlin Gold project included a natural gas pipeline that crosses portions of the BSWI planning area (<https://www.donlingold.com/>).
- **The Western Alaska Access Planning Study's Road to Nome or Yukon Delta Corridors.** The corridor being considered would begin just outside of Manley Hot Springs on the Elliott Highway and terminate on the Nome-Council Highway (Dowl HKM, 2010). *It was determined that no eligible river crossed this corridor.*
- **The Association of Village Council President's Yukon-to-Kuskokwim Energy Corridor.** This project is being considered as part of a freight and fuel plan to link Yukon and Kuskokwim River markets to Interior/Railbelt suppliers.

- **17(b) easements.** The 17(b) easements were also considered reasonably foreseeable future transportation routes. Section 17(b) of Alaska Native Claims Settlement Act (ANCSA) requires the federal government to reserve easements for access to public lands or waters whenever land is conveyed to Native corporations in order to ensure access to public lands and waters.
- **Existing and Nominated ACECs within the BSWI Planning Area.** As part of BSWI RMP, existing and nominated ACECs are being analyzed to determine whether designation and special management is required to maintain relevant and important values. These areas were considered geographic areas where potential may exist for protection of ORVs. Maps 3.1 through 3.6 illustrate the location of eligible rivers in relation to existing and nominated ACECs.

Per BLM (2012) the following management guidelines, applicable to rivers classified as “wild”, were considered when assessing the extent to which reasonably foreseeable future uses pertaining to minerals, transportation, right-of-way (ROW) authorization, motorized travel, wildlife or fish projects, vegetation management, livestock grazing, invasive species management, or withdrawal could be curtailed or foreclosed based on inclusion in the National System.

- **Minerals.** Subject to valid and existing rights, the minerals located on BLM-administered lands within the bed or banks or situated within $\frac{1}{4}$ mile of the bank would be withdrawn from appropriation under the mining and mineral leasing laws in Section 9(a) and 15(2) of the WSRA. Existing valid claims or leases would remain in effect and activities may be allowed, subject to regulations that minimize surface disturbance, water sediment, pollution, and visual impairment.
- **Transportation.** New roads are generally not compatible with this classification. New trail construction should generally be designed for non-motorized uses (however, limited motorized uses that are compatible with identified values may be allowed).
- **Motorized Travel.** Motorized and mechanized travel on land and water may be permitted, restricted, or prohibited to protect river values.
- **Authorization of Rights-of-Way and Designated Utility Corridors.** To the greatest extent possible, the BLM will avoid authorizing new ROW or designating/using transportation or utility corridors within the WSR boundary. Through the land use planning process and through project-level reviews, the BLM will determine if the ROW proposal is compatible with the river’s classification and the protection and enhancement of river values. When developing or revising a land use plan that includes a WSR, the BLM would consider designating the WSR boundary as an exclusion or avoidance area.

Existing Management Provisions

State and federal Laws and Regulations: Various federal, State and local laws have been enacted to protect certain key resources that may coincide with identified ORVs. For example, the federal Clean Water Act regulates actions that may affect water quality. The ADFG has the primary responsibility for managing and conserving resident fish and wildlife populations throughout the State. Coastal areas, including the Yukon Delta, are protected through the Alaska Coastal Management Program by specific local provisions provided in local coastal management plans developed for smaller geographic areas referred to as Coastal Resource Service Areas.

The State of Alaska, through the following Title 16 statutes (Fish and Game), provides protection to fisheries and the habitat that could aid in the preservation of fish ORVs:

- **Anadromous Fish Act (AS 16.05.871-901)** requires that “an individual or government agency provide prior notification and obtain permit approval from ADFG before altering or affecting “the natural flow or bed” of a specified waterbody, or fish stream. All activities within or across a specified anadromous waterbody require approval from Habitat, including construction; road crossings; gravel removal; mining; water withdrawals; the use of vehicles or equipment in the waterway; stream realignment or diversion; bank stabilization; blasting; and the placement, excavation, deposition, or removal of any material.”
- **The Fishway or Fish Passage Act (AS 16.05.841)** requires that “an individual or government agency notify and obtain authorization from the ADFG, Division of Habitat for activities within or across a stream used by fish if it is determined that such uses or activities could represent an impediment to the efficient passage of resident or anadromous fish.”

The extent to which existing management provisions provided protection to identified ORVs is also detailed through existing federal and State planning documents, including the ADNR Area Plans (ADNR 2016) and Yukon Delta National Wildlife Refuge Land Conservation Plan (USFWS 2004) Eligible rivers within the planning area are managed per the Kuskokwim Area Plan (1988) and the Northwest Area Plan (ADNR 2008), described below:

Kuskokwim Area Plan (ADNR 1988) – The Kuskokwim Area Plan describes how ADNR will manage State land in the Kuskokwim River basin and a portion of the Innoko River basin. The plan determines land offering locations, remote cabin areas, land classifications, land selections and relinquishments, areas open to mineral entry, and guidelines for leases and permits on State lands. The plan does not make decisions on federal, Native, or private lands. This Plan, and the following management goals and guidelines apply to the Big River, Blackwater Creek, Pitka Fork Middle Fork Kuskokwim River, Sullivan Creek, Middle Fork Kuskokwim River, Sheep Creek, Tatalawiksuk River, Bear Creek, and Salmon Creek. The Plan identifies fish and wildlife harvest as a primary use of the State lands along most rivers, streams, and lakes with anadromous fish and important resident fish populations, stating: *“To protect important salmon spawning and rearing areas, and sheefish spawning areas, certain streams will be closed to new mineral entry. In areas identified for land offerings, buffers are required along streams and wetlands, including staking setbacks along streams that support anadromous fish”*

Goals Pertaining to Fish Management:

- **Maintain and Protect Publicly Owned Habitat Base.** The State will maintain in public ownership and protect the habitat values of sufficient suitable lands and waters to provide for the habitat needs of fish and wildlife resources necessary to maintain or enhance public use and economic benefits.
- **Mitigate Habitat Loss.** When resource development projects occur, reduction in the quality and quantity of fish and wildlife habitat should be avoided or minimized.

- **Contribute to Economic Diversity.** Protect and enhance fish and wildlife resources and habitats to contribute directly or indirectly to local, regional, and State economies through commercial, subsistence, sport, and non-consumptive uses, while working to achieve the economic development of other resources.

Guidelines Pertaining to Fish Management:

- **Habitat Manipulation.** Habitat manipulation through controlled burning, water control, timber management practices, or other measures may be used to improve habitat for certain fish and wildlife species where feasible and compatible with other primary uses.
- **Structures in Fish Habitat.** Structures in fish habitat will, to the extent feasible, be designed to minimize impacts on fish migration, spawning, and rearing.
- **Water Intake Structures.** When issuing appropriations for waters that provide fish habitat, ADNR will require that practical water intake structures be installed that do not result in entrainment or impingement of fish. The most simple and cost-effective technology may be used to implement this guideline. Water intake structures will be screened and intake velocities will be limited to prevent entrapment, entrainment, or injury to fish. The structures that support intakes should be designed to prevent fish from being led into the intake. Other effective techniques may also be used to achieve this guideline. Screen size, water velocity, and intake design will be determined in consultation with ADFG.
- **Water Withdrawal in the Winter.** Water withdrawal during winter months will, to the extent feasible and prudent, avoid fish overwintering areas.
- **Mitigation.** All land use activities will be conducted with appropriate planning and implementation to avoid or minimize adverse effects on fish and wildlife or their habitats.

Northwest Area Plan (ADNR 2008) - The Northwest Area Plan determines management intent, land-use designations, and management guidelines that apply to all State lands in the planning area. The Northwest Area Plan pertains to portions of the North Fork Unalakleet and the Anvik River.

Goals Pertaining to Fish Management:

- **Mitigate Habitat Loss.** When resource development projects or land disposals occur, avoid or minimize reduction in the quality and quantity of fish and wildlife habitat.
- **Contribute to Economic Diversity.** Contribute to Alaska's economy by protecting the fish and wildlife resources which contribute directly or indirectly to local, regional, and State economies through commercial, subsistence, sport and non-consumptive uses.
- **Maintain and Protect Publicly Owned Habitat Base.** Protect and maintain in public ownership and protect habitat for fish and wildlife resource protection to supply sufficient populations or a diversity of species to support commercial, recreational, or traditional uses on an optimum sustained yield basis; and protect

unique or rare assemblages of a single or multiple species of regional, state, or national significance.

- **Manage for Sustained Yield.** ADNR management of State land and resources is to be consistent with the requirements of sustained yield, as expressed in the State Constitution.
- **Manage to Maintain and Enhance the Natural Environment.** ADNR, in its management of habitat on State lands, shall attempt to maintain and enhance the natural environment in areas known to be important as habitat for fish and wildlife.

Guidelines Pertaining to Fish Management:

- **Mitigation.** When issuing permits and leases or otherwise authorizing the use or development of State lands, ADNR will recognize the requirements of the activity or development and the effects to habitat when determining stipulations or measures needed to protect fish, wildlife, or their habitats.
- **Allowing Uses in Fish and Wildlife Habitats (Ha).** These habitats are defined as areas that serve as concentrated use area for fish and wildlife species during a sensitive life history stage where alteration of the habitat and/or human disturbance could result in a permanent loss of a population or sustained yield of the species.
- **Allowing Uses Outside of Designated Fish and Wildlife Habitat Areas.** Important fish and wildlife habitat or harvest areas may exist within units designated other than Ha. In the granting of authorizations, ADNR adjudicators should consult with the ADFG and the appropriate federal management agency (USFWS and National Marine Fisheries Service [NMFS]) to acquire more detailed and more recent information pertaining to fish and wildlife habitat and harvest values.
- **Habitat Manipulation:** Fish and wildlife enhancement or manipulation activities on State lands, whether by ADFG or other parties, may be used to improve habitat for certain fish and wildlife species where ADFG determines that it is beneficial to the species or habitat and ADNR determines that it is compatible with the management intent for those lands. Habitat manipulation through controlled burning, water control, timber management practices, removal of pollution sources, or other measures may be allowed. Enhancement activities likely to attract significant public use, including sport fishing use, will be designed and located to minimize the impact of additional public use on the existing recreation resources, including anchorages, campsites, and existing and intended wilderness values.
- **Hatchery and Aquatic Farm Source Waters.** To preserve the quality of an existing hatchery's water supply, uses should not be located on State land where they would risk reducing water quality or quantity below that needed by an existing or proposed hatchery.
- **Water Intake Structures.** When issuing water rights for waters providing fish habitat, ADNR will require that practical water intake structures be installed that do not result in entrainment or impingement of fish and will maintain instream flows needed to sustain existing fish populations. The simplest and most cost-effective technology may be used to implement this guideline. Water intake structures should

be screened, and intake velocities will be limited to prevent entrapment, entrainment, or injury to fish. The structures supporting intakes should be designed to prevent fish from being led into the intake. Other effective techniques may also be used to achieve the intent of this guideline. ADNR, Division of Mining, Land, and Water, and ADFG should be consulted to determine screen size, water velocity, and intake design if the intake structure is in fish habitat.

- **Alteration of the Riverine Hydrologic System.** To the extent feasible, channelization, diversion, or damming that will alter the natural hydrological conditions and have a significant adverse impact on important riverine habitat will be avoided.
- **Fish and Wildlife Enhancement on State Lands.** Fish and wildlife enhancement activities on State lands, whether by ADFG or other parties, will be consistent with the management intent for those lands. Enhancement activities likely to attract significant public use, including sport fishing use, will be designed and located to minimize the impact of additional public use on the existing recreation resources, including anchorages, campsites, and existing and intended wilderness
- **Transportation and Utility Facilities.** Important fish and wildlife habitats such as those described as anadromous streams, riparian areas, important seasonal habitats for moose or caribou, fish and wildlife movement corridors, important wintering areas, and threatened or endangered species habitat should be avoided in siting transportation routes unless no other feasible and prudent alternatives exist. Where transportation or utility facilities intersect these habitats, and where no feasible and prudent alternative exists, fish and wildlife movement corridors and habitats will be maintained through the use of alternative designs. Location of routes and timing of construction should be determined in consultation with the ADFG.

Management actions being contemplated in the preferred alternative of the BSWI RMP/EIS were also considered in this suitability assessment as they pertain to reasonably foreseeable potential uses, and also provided information on alternative ways to manage identified ORVs.

Ownership of Submerged Lands

Submerged lands located beneath tidally influenced and inland navigable waters were granted to the State of Alaska by the Equal Footing Doctrine, the Submerged Lands Act of 1953, and the Statehood Act of 1958. In some cases, these submerged lands were reserved by the federal government prior to statehood (January 3, 1959) and are therefore retained by the United States. Where this did not occur, ownership of the submerged lands is based on a navigability determination. If the waterbody is determined to be navigable, even if it is within Conservation System Units (CSUs), then the submerged land is the property of the State up to the ordinary high water line.

Public Support

Public involvement is important to the BSWI RMP/EIS planning process, including the Wild and Scenic River Study, because it engages the public in management decisions. It is also a legal requirement outlined under the National Environmental Policy Act (NEPA) and Federal Land Policy and Management Act.

The Federal Register (FR) published BLM's Notice of Intent (NOI) to develop the BSWI RMP/EIS on July 18, 2013 (FR 2013). The NOI started the formal 150-day public scoping period, as required by NEPA. A federal government shutdown extended the BSWI RMP/EIS scoping period from 150 days to 180 days. With the extension, the formal public scoping period for the BSWI RMP/EIS lasted until January 17, 2014. During scoping, the BLM established a project mailing list of interested stakeholders, including federally recognized tribes, Alaska Native corporations, federal, state, and local government, non-government organizations, individuals, and media outlets. Public outreach during scoping included a press release, postcard to the project mailing list, an online open house, public service announcements on multiple radio stations, a public radio interview, and consultation with the Alaska State Historic Preservation Office. In addition, the BLM held public scoping meetings in ten communities during November and December of 2013: Anchorage, Bethel, Aniak, McGrath, Unalakleet, Grayling, Holy Cross, Russian Mission, Lower Kalskag, and Chuathbaluk. The BLM published the Public Scoping Summary Report in May, 2014.

During 2014, the BLM identified planning issues and developed preliminary alternatives based on internal and external scoping. The formal preliminary alternatives public outreach period occurred from February 22, 2015 to May 31, 2015. This preliminary alternatives outreach period was an optional public outreach not required by NEPA and does not have the same formal requirements as scoping and the release of the Draft RMP/EIS. The BLM wanted to conduct this outreach for the BSWI RMP/EIS between the scoping period and the release of the Draft RMP/EIS with the goal of gaining information useful in further refining alternatives for analysis. As part of this effort, the Draft Wild and Scenic River Eligibility Report (BLM 2015) was made available for public review and comment prior to completing this Suitability Study. The BLM sent postcards announcing the preliminary alternatives outreach period to the project mailing list, had an online open house, and sent press releases. Public meetings were held in 14 communities: Anchorage, Bethel, Aniak, McGrath, Unalakleet, Grayling, Holy Cross, Russian Mission, Lower Kalskag, Upper Kalskag, Chuathbaluk, Crooked Creek, Kaltag, and Nulato. Tribal representatives attended public meetings in most communities, but separate government-to-government consultation meetings were held with tribes in Bethel and Unalakleet.

The BLM has sent newsletters and several eNews blasts to the mailing list with updates on the BSWI RMP/EIS planning process. Members of the BLM-Alaska Resource Advisory Council (RAC) are on the mailing list, and the BSWI RMP/EIS planning team has given periodic update presentations to the BLM-RAC. In addition to BLM-RAC and public meetings, the BLM has given presentations about the BSWI RMP/EIS to the following organizations: Iditarod Historic Trail Alliance, Holy Cross Village Council, Anvik Village Council, Crooked Creek Traditional Council, Alaska Miners Association, National Park Service, and the Calista Corporation. The BLM has also presented at the Bureau of Indian Affairs Annual Providers Conference, the biannual Alaska Miners Association Convention, and the Alaska Forum on the Environment. The State of Alaska, the USFWS, and one tribe (the Alaska Native Village of Chuathbaluk) are cooperating agencies for the BSWI RMP/EIS. The BLM has maintained a project website throughout the BSWI RMP/EIS planning process, and members of the public are able to contact BLM staff about the plan by phone, email, or fax.

Outcomes Pertaining to the Wild and Scenic River Study

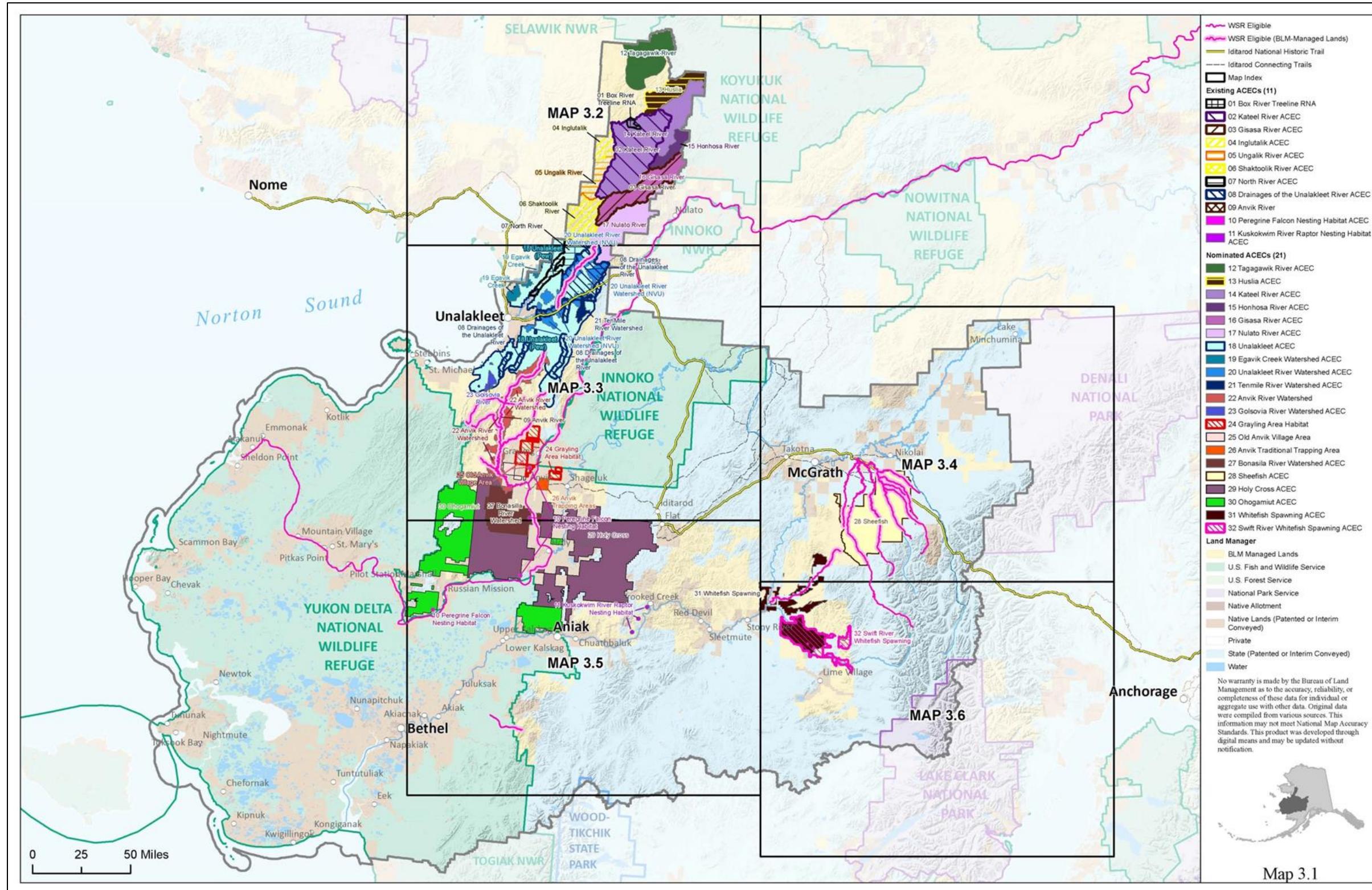
Public comments pertaining to river values are provided in Appendix C. Only one public comment received addresses the concept of WSR designation specifically. The majority of

comments focus on fish values, water quality, validity of ORVs, navigability of waterways (and related State jurisdiction), and support of WSR designation. Specific topics included:

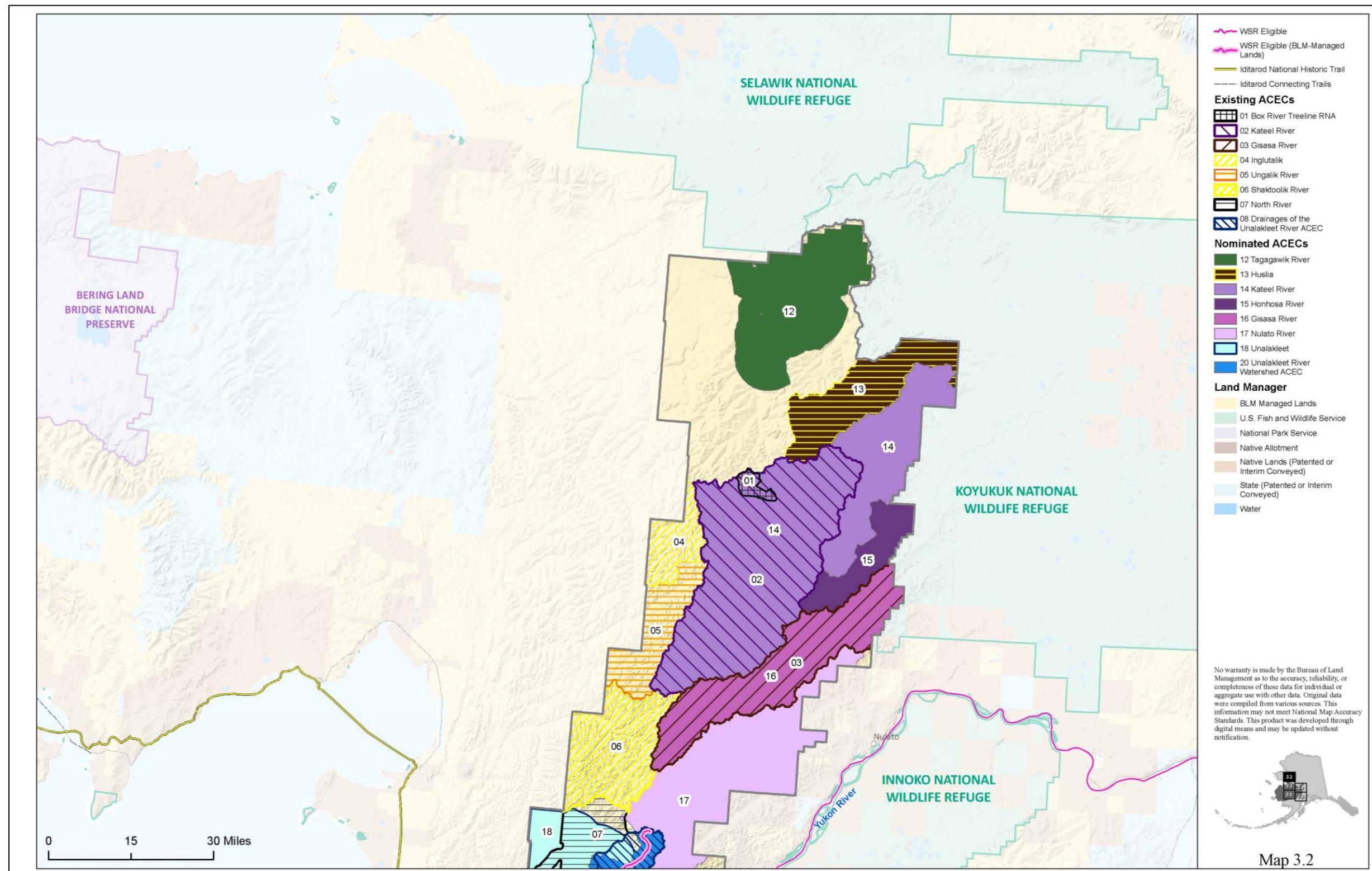
- Conservation and preservation of spawning areas;
- Importance of water quality;
- Concern about regulations pertaining to fisheries;
- Recognition of the Nulato System, Anvik River, the Big River, Tatlawiksuk River, the South fork of the Kuskokwim, and Unalakleet River for its fisheries value;
- Reliance on smelt that spawn in the Upper Kuskokwim;
- Use of areas near the Yukon River, Nualto or Kuyokuk Rivers for subsistence;
- Concern that motorized use in waterways continue as an allowable use;
- Recognition of the state's role in resource protection, including partnership with the BLM;
- WSRs designation as it pertains to authorized ROW, specifically the proposed Donlin Gold Project;
- Concern that the navigable water issue is not finalized in the BSWI planning area, and the relevance of a navigability determination to State ownership of the waterbody;
- Opposition to alternatives that close (withdraw) "suitable" WSRs;
- Support to designate the South Fork of the Kuskokwim from Rhon to Nikolai as a WSR;
- Support and opposition to use of ACECs as a management tool to protect fish and habitat;
- Concern about "layering" management of rivers as WSR and ACEC;
- Concern about the justification of ORVs provided in the Draft Wild and Scenic River Eligibility Report (BLM 2015);
- Concern about the Region of Comparison used in the eligibility analysis provided in the Draft Wild and Scenic River Eligibility Report (BLM 2015);
- Concern that the association of the INHT with a river is not sufficient to justify it as a historic or cultural ORV;
- Questioning consideration of fish resource value on the Kuskokwim as an ORV.
- Questioning consideration of the Yukon River as eligible for inclusion in the National System due to its use as an international travel way;
- Concern that designation of a river as a WSR would encourage visitation and threaten the fishery; and,
- Concern that any recommendations of suitability for inclusion in the National System would be in violation of ANILCA Section 1326(b).

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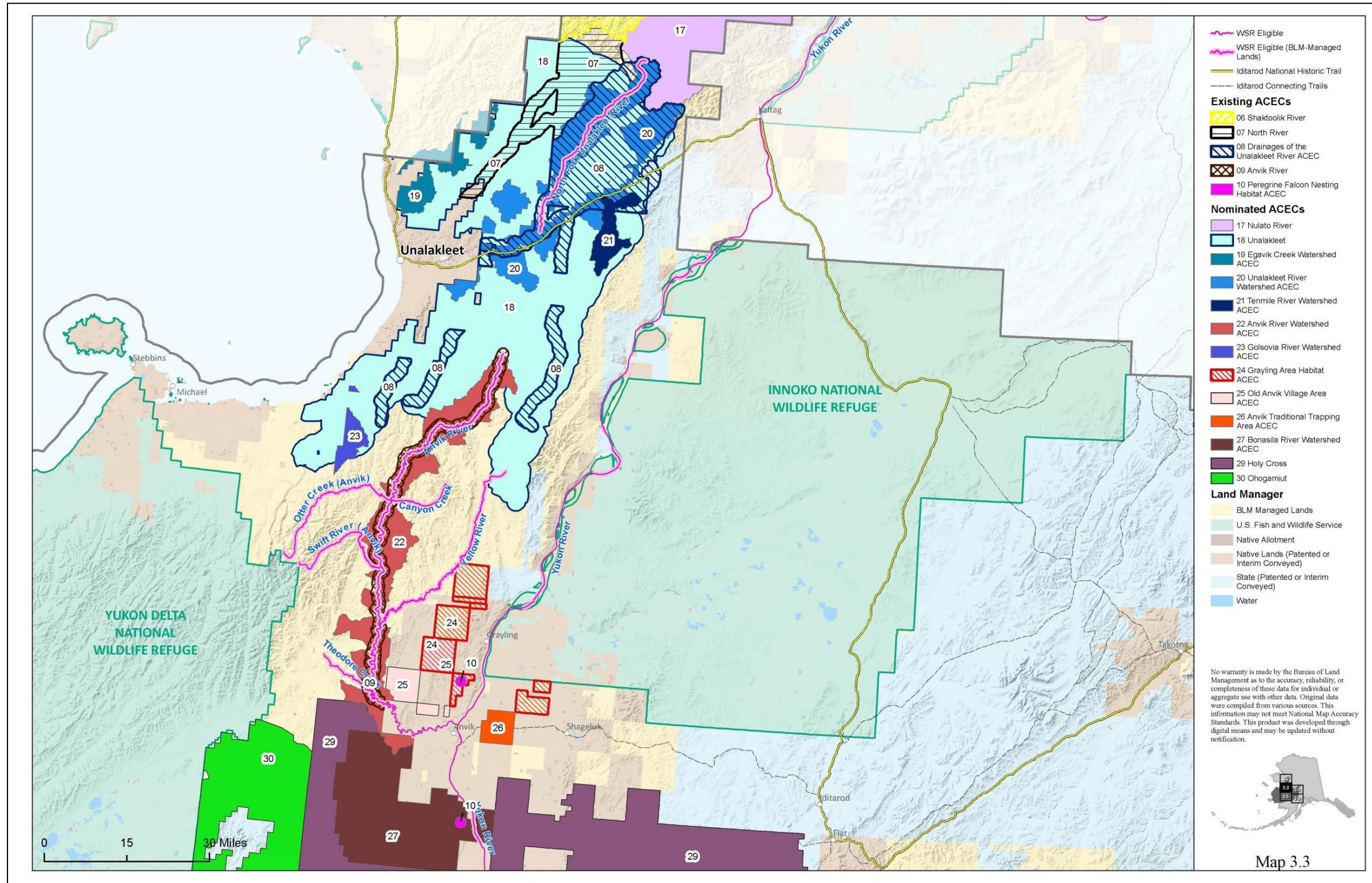
Map 3.1 WSR Eligible Rivers and Streams and Existing and Nominated ACECs (Overview)



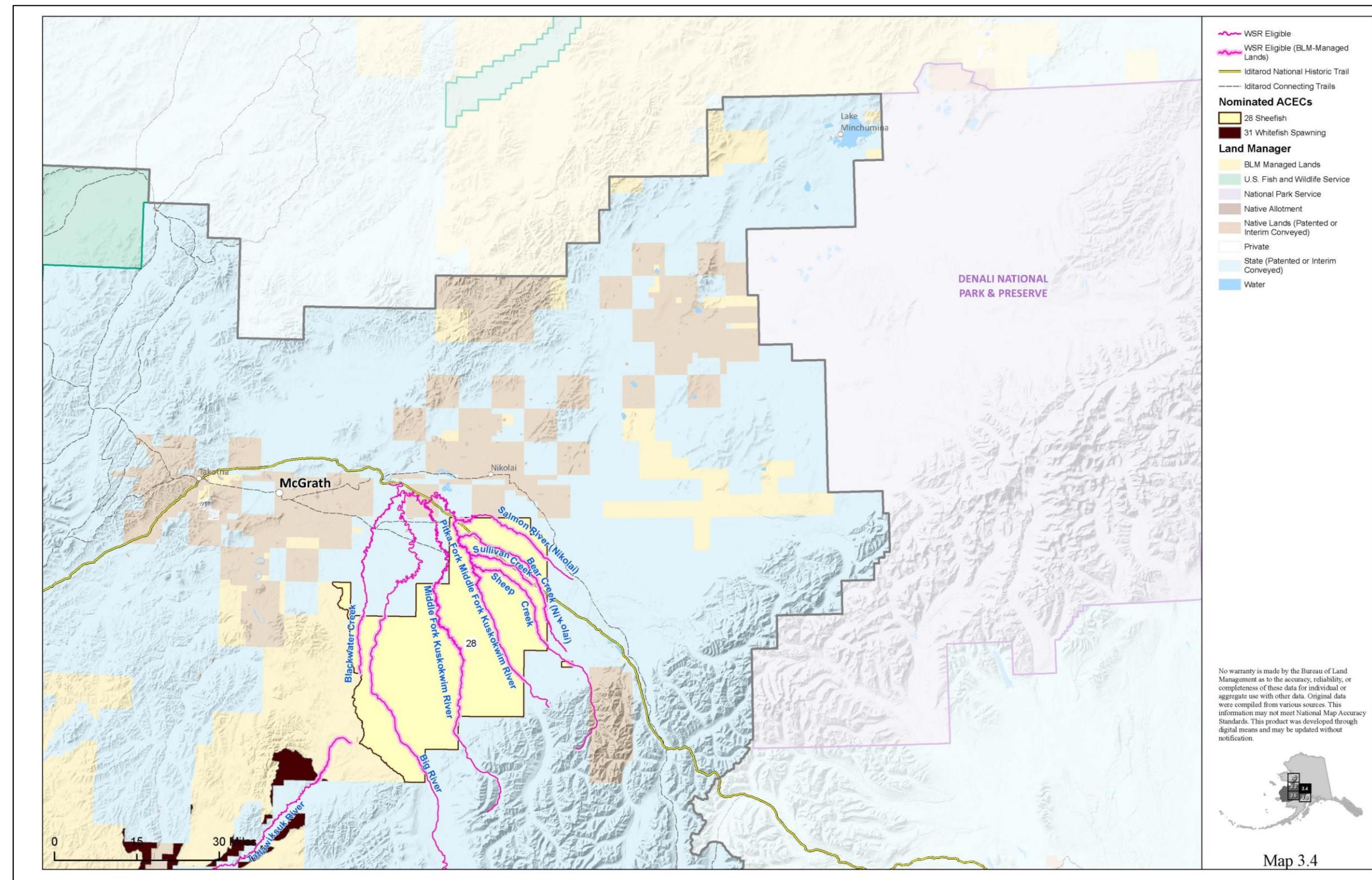
Map 3.2 WSR Eligible Rivers and Streams and Existing and Nominated ACECs



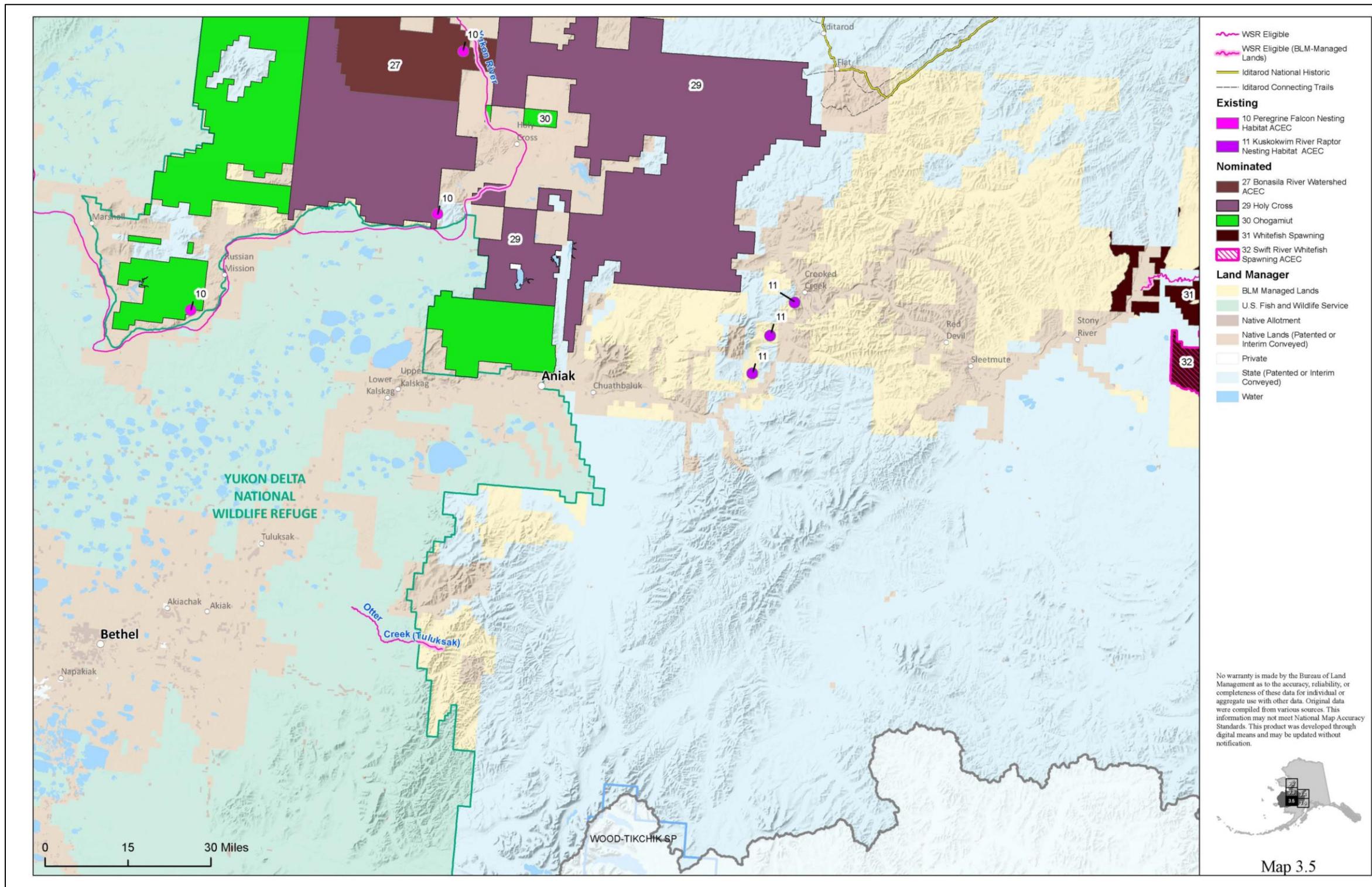
Map 3.3 WSR Eligible Rivers and Streams and Existing and Nominated ACECs



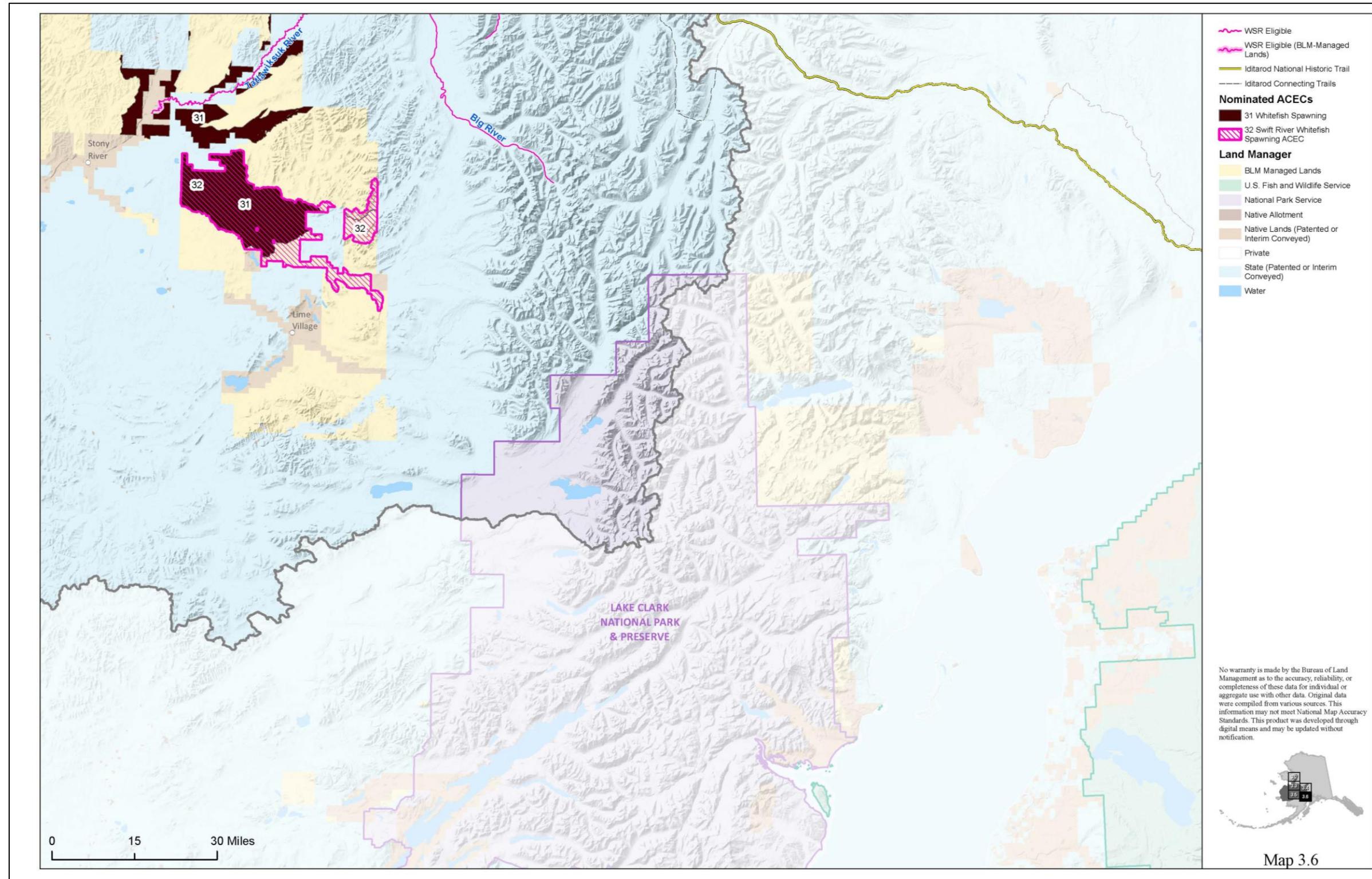
Map 3.4 WSR Eligible Rivers and Streams and Existing and Nominated ACECs



Map 3.5 WSR Eligible Rivers and Streams and Existing and Nominated ACECs



Map 3.6 WSR Eligible Rivers and Streams and Existing and Nominated ACECs



3.2 Suitability Assessment

3.2.1 Anvik River

The Anvik River was determined eligible for inclusion in the National System based on its free-flowing characteristic and presence of ORVs for fish and cultural resources. A preliminary suitability determination was prepared for the Anvik River based on objective attributes of the river and an evaluation of the 13 “suitability factors.”

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: A total of 119 miles (79 percent) of the 150-mile Anvik River travels through BLM-managed lands and 20 percent crosses Alaska Native-owned lands. The lower 31 miles of the Anvik River were determined navigable per a determination completed by the BLM dated March 28, 1980 (BLM 1980). The river was determined navigable from river mile 31 to river mile 90 (Otter Creek confluence) and unnavigable from river mile 90 to river mile 120 (the source) per a navigability determination completed by the BLM dated February 4, 2015 (BLM 2015a). Of the approximately 119 river miles that cross BLM lands, 58 miles (48 percent) are considered navigable; consequently, submerged lands in this segment are the property of the State of Alaska.

Over 99 percent of the eligible segment of the Anvik River is located within the existing Anvik River ACEC. There is one commercial fishing lodge located on private land on the Anvik River.

Mineral and Energy Resource Activities: The Anvik River, through association with the Anvik River ACEC, occurs within lands withdrawn by Public Land Order (PLO) 5180. Portions of the ACEC are not covered by this PLO and are open to the public land laws. PLO 5180 withdrew lands (subject to valid existing rights) from all forms of appropriation under the public land laws, including selections by the State of Alaska under the Alaska Statehood Act and from location and entry under the mining laws (except locations for metalliferous minerals) and from leasing under the Mineral Leasing Act. The lands were reserved for study to determine the proper classification of the lands under section 17(d) (1) of the ANCSA. The lands are currently managed under the 1981 Southwest Management Framework Plan and are open on a case-by-case basis to leases, permits, rights of way, and easements.

This waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: No transportation networks (roads, 17(b) easements) exist within the river corridor.

Recreation Activities: The Anvik River is known to have excellent fishing for four species of salmon as well as northern pike, sheefish, Arctic char, rainbow trout, and grayling. The river is rated Class 1 (easy) on the International Scale of River Difficulty; about 121 miles is suitable for floating by open canoes, folding boats and kayaks, inflatable canoes, and rafts. Floatplanes, riverboats, and wheeled airplanes can land on gravel bars to transport recreational boaters to McDonald Creek, near the headwaters. A remote fishing lodge is located on the Anvik River, approximately 75 miles upriver from Anvik.

Special Areas: The Anvik River is associated with one special management area: the Anvik River ACEC. The Anvik River ACEC was established in 1981 with the original intent of protecting spawning habitat for the largest population of chum salmon in the Yukon River system. The original intent is still applicable today.

Socioeconomic Environment: The Anvik River is a tributary of the Yukon River, flowing from the Nulato Hills southeast. It meets the Yukon River near the community of Anvik. Anvik has a population of 77 (ADLWD 2016). Anvik is a city within the Yukon-Koyukuk Census Area (U.S. Census 2015). The median household income for Anvik is \$26,563, and 16.3 percent of the population is below the poverty level (U.S. Census 2015). Most residents, approximately 93 percent, are Alaska Natives (U.S. Census 2010). Anvik is home to the Deg Hit'an people. Anvik residents rely heavily on subsistence. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. The Anvik River Lodge is 75 miles north of the City of Anvik. It attracts recreationists who sport fish on the Anvik River. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Approximately three-fourths of employed Anvik residents work in local government (ADLWD 2015). The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** Of the approximately 119 river miles that cross BLM lands, 58 miles (48 percent) are considered navigable; consequently, submerged lands in this segment are the property of the State of Alaska. Because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). Current and potential uses of this river are already subject to required operating procedures that protect ORVs, including the existing Anvik River ACEC. Due to the extreme remote location, the cost to access and administer this river would be high.
- 2. The current land ownership in the area.** A total of 119 miles (58 percent) of the 150-mile Anvik River travels through BLM-managed lands and 20 percent crosses Alaska Native-owned lands. The lower 31 miles of the Anvik River were determined navigable per a determination completed by the BLM dated March 28, 1980 (BLM 1980). The river was determined navigable from river mile 31 to river mile 90 (Otter Creek confluence) and unnavigable from river mile 90 to river mile 120 (the source) per a navigability determination complete by the BLM dated February 4, 2015 (BLM 2015a). Of the approximately 119 river miles that cross BLM lands, 58 miles (48 percent) are considered navigable; consequently, submerged lands in this segment are the property of the State of Alaska.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORVs would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the existing Anvik River ACEC and the nominated Anvik Watershed ACEC and Unalakleet ACEC currently contemplated in the BSWI RMP/EIS. Additional protection would be provided though its designation as a High Value Watershed (HVW), also contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed:

- **Minerals.** PLO 5180 withdrew lands (subject to valid existing rights) from all forms of appropriation under the public land laws, including selections by the State of Alaska under the Alaska Statehood Act and from location and entry under the mining laws (except locations for metalliferous minerals) and from leasing under the Mineral Leasing Act. The lands were reserved for study to determine the proper classification of the lands under section 17(d) (1) of the ANCSA. This waterbody is located in a low mineral potential mineral area (BLM 2017).
 - **Transportation.** This river does not cross the proposed Road to Nome or the Yukon to Kuskowkim Energy corridor. No other reasonably foreseeable future uses are identified for this river.
 - **Motorized Travel.** Motorized travel by boat occurs on the Anvik River for subsistence and recreation fishing purposes and for travel.
 - **Authorization of Rights-of-Way and Designated Utility Corridors.** This river does not cross any locations pending ROW applications.
4. **The federal agency that will administer the area should it be added to the National System.** The BLM would administer the area should it be added to the National System.
 5. **The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared-administration of the river should it be included in the National System.
 6. **The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
 7. **A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** Through scoping comment for the BSWI RMP/EIS, the State of Alaska maintained its opposition to WSR studies in the State; therefore, it is assumed the State will not participate in the preservation and administration of the river should it be included in the national system (see Criteria number 10).
 8. **An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** Because of the importance of the Anvik River's fisheries, management measures aimed at monitoring and protection of

this important resource have been applied at both the State and federal level. These measures include:

- **Federal Management:**

- ACECs: Over 99 percent of the eligible segment of the Anvik River is located within the Anvik River ACEC. This designation provides protection to the ORVs for which the river considered eligible.
- Water Reservation: The BLM submitted an application for reservation of water to ADNR on September 14, 2007 (DNR file application LAS 27140) for the middle segment of the Anvik River, from the confluence of Beaver Creek downstream to the border of BLM-managed land. The purpose of this reservation is to maintain year-round flows necessary to sustain fish and wildlife habitat, migration, and propagation within and adjacent to the Anvik River.

- **State Management:**

- Cultural Resource Protection: Management of cultural and historic resources provided by the State Historic Preservation Office.
- Research and Monitoring: ADFG operates the Anvik sonar site on the Anvik River to monitor escapement of summer chum salmon to the Anvik River drainage.
- The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. The Anvik River is also managed, in part, by the Northwest Area Plan (ADNR 2008).

9. **The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional State or local management capacity exists for this river beyond what is already provided.
10. **The existing support or opposition of designation.** There is no State or local interest in including the Anvik River in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
11. **The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b) (*see Section 3.1 and Appendix C*).
12. **The contribution to river or basin integrity.** Inclusion of the river in the National System would contribute to system or basin integrity by protecting the integrity of the waterway and ensuring passage of anadromous fish to its tributaries. The following tributaries have also been identified as eligible based on the presence of ORVs for fish: McDonald Creek, Otter Creek (Tuluksak), Swift River, Yellow River, and Theodore Creek.

13. The potential for water resources development. There are no known water resource projects on the Anvik River.

Preliminary Suitability Determination

Based on this evaluation, **the Anvik River was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's ability to effectively manage ORVs of the Anvik River through the existing Anvik River ACEC and future management decisions being contemplated in the preferred alternative of the BSWI RMP. Future management decisions include designation as an HVW and approval of the Anvik River Watershed ACEC and Unalakleet ACEC. Further, because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and, in part, by the Northwest Area Plan (ADNR 2008).

3.2.2 Bear Creek (Nikolai)

Bear Creek (Nikolai) was determined eligible for inclusion in the National System based on its free-flowing characteristic and presence of ORVs for fish and historic resources. A suitability determination was prepared for Bear Creek (Nikolai) based on objective attributes of the river and an evaluation of the 13 “suitability factors.”

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately 41 miles (80 percent) of this 51-mile waterway travels through BLM-managed lands, with the remainder crossing Alaska Native and State-owned lands. The BLM has not completed a navigability determination for this river.

Mineral and Energy Resource Activities: Bear Creek (Nikolai) is located within the Minchumina oil and gas basin; however this waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: Bear Creek (Nikolai) intersects the Iditarod Sled Dog Race Route, the INHT Primary Route, and the INHT. The routes are the main winter overland routes from the Kuksowkim valley to Southcentral Alaska.

Recreation Activities: Bear Creek (Nikolai) intersects the Iditarod Sled Dog Race Route, the INHT Primary Route, and the INHT CSU.

Other Resource Activities: A flow gauge is located on Bear Creek at Illiamna.

Special Areas: Bear Creek does not cross any special management areas.

Socioeconomic Environment: Bear Creek is approximately 10 miles south of the community of Nikolai. Nikolai has 94 residents (ADLWD 2016) and is an incorporated city within the Yukon-

Koyukuk Census Area (U.S. Census 2015). The regional center city of McGrath has 302 residents and is approximately 30 miles from Bear Creek. Most residents in Nikolai are Athabascan. Just over half of McGrath residents are Athabascan or other Alaska Native. Nikolai has a median household income of \$31,250, with approximately 15.5 percent of persons below the poverty level. McGrath has a higher median household income of \$63,654, and a similar poverty level of 18.2 percent.

Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Important employers include local government, retail stores owned by Alaska Native village corporations, commercial fishing, and fish processing. The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** Bear Creek (Nikolai) intersects the Iditarod Sled Dog Race Route, the INHT Primary Route, and the Iditarod NHT CSU. Inclusion of the river in the National System could enhance historic ORVs, thereby making this river a worthy addition. However, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. Protection of fish and historic ORVs could also be provided through designation of the nominated Sheefish ACEC currently contemplated in the BSWI RMP/EIS. This ACEC encompasses approximately 41 miles of the river, coinciding with the portion of the river located on BLM-administered lands. This waterbody is also located in an area being evaluated as an HVW.
- 2. The current land ownership status in the area.** Eighty percent, or approximately 41 miles, of this 51-mile waterway travels through BLM-managed lands, with the remainder crossing Alaska Native and State-owned lands. The BLM has not completed a navigability determination for this river; therefore, BLM retains management authority of submerged lands adjacent to BLM-administered lands.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Sheefish ACEC currently contemplated in the BSWI RMP/EIS. Additional protection would be provided though its designation as an HVW, also contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed:

- **Minerals** – Bear Creek (Nikolai) is located within the Minchumina oil and gas basin, with potential of leasable mineral development; however this waterbody is located in a low mineral potential mineral area (BLM 2017).

- Transportation – This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors. No other reasonably foreseeable future uses are identified for this river.
 - Motorized Travel – Bear Creek (Nikolai) intersects the Iditarod Sled Dog Race Route, the INHT Primary Route, and the Iditarod NHT. This waterbody is also used for winter subsistence access. Navigability of this river is unknown.
 - Authorization of Rights-of-Way and Designated Utility Corridors – This waterbody does not cross any locations pending ROW applications.
4. **The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be added to the National System.
 5. **The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of the river should it be included in the National System.
 6. **The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
 7. **A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** Through scoping comment for the BSWI RMP/EIS, the State of Alaska maintained its opposition to WSR studies in the State; therefore, it is assumed the State will not participate in the preservation and administration of the river should it be included in the national system.
 8. **An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.**

The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and The Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs.

Bear Creek (Nikolai) is managed per the Kuskokwim Area Plan (ADNR 1988). Additional State and local capacity would be required should the waterbody be included in the National System.
 9. **The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional capacity beyond what is provided by existing statutes and the Kuskokwim Area Plan is available.
 10. **The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).

- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. The contribution to river or basin integrity.** Because the river is owned by the State of Alaska, and there is no known support from the State for its designation, the BLM would have limited ability to manage this river (through WSR provisions) in manner that would contribute to System or Basin integrity.
- 13. The potential for water resources development.** No known water resource projects exist on Bear Creek (Nikolai).

Preliminary Suitability Determination

Based on this evaluation, **Bear Creek (Nikolai) was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the conclusion that the BLM could effectively manage ORVs of Bear River through future management decisions being contemplated by the BSWI RMP. Future management decisions include designation as an HVW and approval of the nominated Sheefish ACEC. Further, there is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and the Kuskokwim Area Plan (ADNR 1988).

3.2.3 Big River

The Big River was determined eligible for inclusion in the National System based on its free-flowing characteristic and presence of ORVs for fish. A suitability determination was prepared for the Big River based on objective attributes of the river and an evaluation of the 13 “suitability factors.”

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately 35 miles (26 percent) of this 137-mile waterway travels through BLM-managed lands, with the remaining majority crossing State-owned lands. No navigability determination has been completed by the BLM for this river.

Mineral and Energy Resource Activities: Big River crosses the Minchumina oil and gas basin; however this waterbody is located in a low mineral potential mineral (BLM 2017). To protect this important spawning area, State lands below ordinary high water in the following sections of the Big River will be closed to new mineral entry: T31N R30W S.M. sec. 33 & 34 and T30N R30W S.M. sec. 4, 5, 7, 8, 9, 17, & 18 (ADNR 1988).

Transportation, Facilities, and Other Development: No transportation networks (including 17(b) easements) exist within the river corridor. Big River intersects the Donlin pipeline alignment.

Recreation Activities: Low potential for recreation use (ADNR 1988).

Other Resource Activities: The number of resource activities for the Big River is generally low (ADNR 1988).

Special Areas: This river does not cross any special management areas.

Socioeconomic Environment: Big River is located approximately 25 miles south of the community of McGrath. The City of McGrath has 302 residents and is within the Yukon-Koyukuk Census Area. Just over half of McGrath residents are Athabascan or other Alaska Native. McGrath has a median household income of \$64,792 and a poverty level of 16.8 percent (U.S. Census 2015).

Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Important employers include local government, retail stores owned by Alaska Native village corporations, commercial fishing, and fish processing. The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** Because the BLM only has management authority in upland areas administered by the BLM (approximately $\frac{1}{4}$ of the length of the river, or 35 miles), long-term protection of ORVs in the majority of the waterbody would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). Current and potential uses of this river are already subject to required operating procedures that protect ORVs, including the nominated Sheefish ACEC. Additional protection would be provided through its designation as an HVW, also contemplated in the BSWI RMP/EIS. Due to the extreme remote location, the cost to access and administer this river would be high.
2. **The current land ownership status in the area.** Twenty-six percent of this 137-mile waterway travels through BLM-managed lands, with the remaining majority crossing State-owned lands. No navigability determination has been completed by the BLM for the Big River.
3. **The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Sheefish ACEC currently contemplated in the BSWI RMP/EIS. Additional protection would be provided through its designation as an HVW, also contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed:

- Minerals – Big River crosses the Minchumina oil and gas basin, with potential of leasable mineral development; however this waterbody is located in a low mineral potential mineral (BLM 2017).
 - Transportation – This waterbody does not cross the proposed Road to Nome or the Yukon Delta Road corridors. No other reasonably foreseeable future uses are identified for this river.
 - Motorized Travel – The lower 60 miles (approximately) of Big Creek is used for motorized travel via boat; above that segment, motorized access is possible by jet or airboat.
 - Authorization of Rights-of-Way and Designated Utility Corridors – Big River intersects the proposed Donlin Mine Project ROW. In contemplating this ROW application, BLM would determine if the proposal is consistent with the river's classification and the protection and enhancement of river values.
4. **The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be added to the National System.
 5. **The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared-administration of the river should it be included in the National System.
 6. **The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
 7. **A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** State participation in the administration of this waterbody as a WSR is not expected.
 8. **An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs.
- The Big River is subject to management guideline provided in the Kuskokwim Area Plan (ADNR 1988).
9. **The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional State and local capacity beyond what is provided through existing statutes and provisions of the Kuskokwim Area Plan (ADNR 1988) is expected should the waterbody be included in the National System.

- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. The contribution to river or basin integrity.** This river is a tributary to the Middle Fork of the Kuskokwim River, an eligible WSR considered as part of this WSR study. Collectively, these tributaries (Salmon River (Nikolai), Bear Creek (Nickolai), Sullivan Creek, Sheep Creek, and the Pitka Fork Middle Fork River are all considered eligible WSRs. Should this collection of eligible rivers, including the main stem Middle Fork of the Kuskokwim River, be included in the National System, a positive contribution to overall system and basin integrity of the Middle Fork of the Kuskokwim River would be achieved.
- 13. The potential for water resources development.** No known water resource projects exist on Big River.

Preliminary Suitability Determination

Based on this evaluation, **the Big River was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the difficulty in effectively managing ORVs given the small portion of the river administered by the BLM. Because the majority of the river is owned by the State of Alaska, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871- .901), the Fishway or Fish Passage Act (AS 16.05.841), and the Kuskokwim Area Plan (ADNR 1988). The BLM is contemplating additional management provisions to protect ORVs through the BSW RMP/EIS, including the nominated Sheefish ACEC and designation of an HVW.

3.2.4 Blackwater Creek

Blackwater Creek was determined eligible for inclusion in the National System based on its free-flowing characteristic and presence of ORVs for fish. A suitability determination was prepared for the Blackwater Creek based on objective attributes of the river and an evaluation of the 13 “suitability factors” described below.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately 12 miles (18 percent) of this 67-mile waterway travels through BLM-managed lands, with the majority crossing State-owned lands. The BLM has not completed a navigability determination for this river.

Mineral and Energy Resource Activities: Blackwater Creek crosses the Minchumina oil and gas basin; however this waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Recreation Activities: The number of resource activities for Blackwater Creek is generally low (ADNR 1988). Southwest Management Framework Plan does not mention Blackwater Creek. It does, however, recommend collaborating with other agencies to promote recreational use of multiple waterbodies in the planning area. The plan also recommends developing a brochure describing opportunities for aquatic recreation in Southwest Alaska to inform the public of the many opportunities available and spread use, rather than concentrate it.

Special Areas: Blackwater Creek does not cross any special management areas.

Socioeconomic Environment: Blackwater Creek is approximately 28 miles south of the community of McGrath. The City of McGrath has 302 residents and is within the Yukon Koyukuk Census Area. Just over half of McGrath residents are Athabascan or other Alaska Native. McGrath has a median household income of \$64,792 and a poverty level of 16.8 percent (U.S. Census 2015).

Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Important employers include local government, retail stores owned by Alaska Native village corporations, commercial fishing, and fish processing. The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** Because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs in the majority of the waterbody would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). Current and potential uses of this river are already subject to management provisions that protect ORVs within the nominated Sheefish ACEC. Due to the extreme remote location, the cost to access and administer this river would be high.
2. **The current land ownership status in the area.** Approximately 12 miles (18 percent) of this 64-mile waterway travels through BLM-managed lands, with the majority crossing

State owned lands. The BLM has not completed a navigability determination for this river.

3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Sheefish ACEC currently contemplated in the BSWI RMP/EIS. This waterbody is not under consideration for designation as an HVW.

Curtailed or Foreclosed:

- Minerals - Blackwater Creek crosses the Minchumina oil and gas basin, with potential of leasable mineral development; however this waterbody is located in a low mineral potential mineral (BLM 2017).
- Transportation –This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors.
- Motorized Travel –Motorized boat travel is unlikely in the upper sections of Blackwater Creek administered by the BLM. Winter travel by snowmobile is highly likely.
- Authorization of Rights-of-Way and Designated Utility Corridors -This river does not cross any locations pending ROW applications.

4. The federal agency that will administer the area should it be added to the National System. The BLM would administer the river should it be added to the National System.

5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies. The BLM is not proposing shared administration of the river should it be included in the National System.

6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System. Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.

7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System. Through scoping comment for the BSWI RMP/EIS, the State of Alaska maintained its opposition to WSR studies in the State; therefore, it is assumed the State will not participate in the preservation and administration of the river should it be included in the national system (see Criteria number 10).

8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development. The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act

(AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs.

At the State level, this waterbody is subject to management guideline provided in the Kuskokwim Area Plan (ADNR 1988).

- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional capacity beyond what is provided by existing statutes and the Kuskokwim Area Plan (ADNR 1988) is available.
- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. The contribution to river or basin integrity.** Because the river is owned by the State of Alaska, and there is no known support from the State for its designation, the BLM would have limited ability to manage this river (through WSR provisions) in manner that would contribute to System or Basin integrity. Blackwater Creek is part of the Kuskokwim River drainage, and a “systems” approach would require inclusion of the Kuskokwim River and other tributaries in the National System.
- 13. The potential for water resources development.** There are no known water resource projects on Blackwater Creek.

Preliminary Suitability Determination

Base on this evaluation **Blackwater Creek was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the difficulty for the BLM to effectively manage ORVs given the small portion of the river administered by the BLM. Because the majority of the river is owned by the State of Alaska, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). Although there is not support for inclusion of this waterbody in the National System, management provisions exist at the federal and State level to protect fisheries resources within Blackwater Creek. The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). Additional protection for ORVs is provided by management guidelines contained in the Kuskokwim Area Plan (ADNR 1988). At the federal level, additional management measures aimed at the protection of this important resource are currently proposed though the nominated Sheefish ACEC being contemplated in the preferred alternative BLM’s BSWI RMP/EIS.

3.2.5 Canyon Creek

Canyon Creek was determined eligible for inclusion in the National System based on its free-flowing characteristic and presence of ORVs for fish. A suitability determination was prepared for Canyon Creek based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: This entire 16-mile waterway travels through BLM-managed lands. No determination of navigability has been made by the BLM.

Mineral and Energy Resource Activities: Canyon Creek does not cross any areas of known high or medium leasable or locatable mineral potential.

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: Canyon Creek does not cross any special management areas.

Socioeconomic Environment: Canyon Creek is approximately 27 miles from the City of Grayling, which has a population of about 189 residents. The City of Grayling has a population of 189 residents and is within the Yukon-Koyukuk Census Area (ADLWD 2016). Most residents, approximately 87 percent, are Alaska Native (U.S. Census 2010). Canyon Creek is approximately 43 miles away from Unalakleet. The City of Unalakleet has a population of 758 (ADLWD 2016) and is within the Nome Census Area. Most residents, approximately 78 percent, are Alaska Native (U.S. Census 2010).

Grayling and Unalakleet area residents rely heavily on subsistence. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. The median household income for Grayling is \$20,417 and 42 percent of the population is below the poverty level (U.S. Census 2015). Unalakleet is larger than surrounding communities and has more opportunity for wage labor. Approximately 14.9 percent of Unalakleet residents are below the poverty level and the median household income is \$68,015 (U.S. Census 2015).

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** Due to the extreme remote location, the cost to access and administer this river would be high. There is no local interest with designating this waterway.
2. **The current land ownership status in the area.** Canyon Creek is administered entirely by the BLM.
3. **The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Protection of ORV for fish is provided by the existing Anvik River ACEC. Canyon Creek also crosses the nominated Anvik Watershed ACEC currently contemplated in the BSWI RMP/EIS; however the intersection is minimal. Collectively, these ACEC designations are not expected to result in measureable enhancement of ORVs due to the limited portion of the river included in these special management areas. The entire waterbody is included in an HVW currently being contemplated by the BSWI RMP/EIS.

Curtailed or Foreclosed: No reasonably foreseeable future uses would be curtailed or foreclosed, as Canyon Creek does not cross any areas of known mineral potential, and does not cross the proposed Road to Nome or the Yukon Delta Road corridors. Due to the steepness and rugged terrain, this river is not likely used for motorized winter or summer travel. Finally, this river does not cross any locations pending ROW applications.

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs.
- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** This waterbody is not managed through an existing ADNR Area Plan. Additional State and local capacity beyond what is provided by existing statutes may be required should the waterbody be included in the National System.
- 10. The existing support or opposition of designation.** No local interest. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA.

- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. The contribution to river or basin integrity.** This river is a tributary to the Anvik River, an eligible WSR considered as part of this WSR study. The main stem Anvik River, from its headwaters to the border of BLM-administered and State-owned lands, approximately 15 miles upriver from the confluence with the Yukon River. Collectively, Theodore Creek, Swift River (Anvik), Otter Creek (Anvik), Canyon Creek, and Yellow River are all considered eligible WSRs. Should this collection of eligible rivers, including the main stem Anvik River, be included in the National System, a positive contribution to overall system and basin integrity would be achieved.
- 13. The potential for water resources development.** No known water resource projects exist on Canyon Creek.

Preliminary Suitability Determination

Based on this evaluation, **Canyon Creek was preliminarily determined to be not suitable for inclusion in the National System**. This determination is based on the extreme remote location, and the high cost to access and administer this river. There is no local interest with designating this waterway. Protection of ORV for fish is provided by the existing Anvik River ACEC. Canyon Creek also crosses the nominated Anvik Watershed ACEC currently contemplated in the BSWI RMP/EIS; however the intersection is minimal. Protection of ORVs could also be accomplished through designation as an HVW, also being contemplated by the BSWI RMP/EIS. The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841). This waterbody is not managed through an existing ADNR Area Plan.

3.2.6 Middle Fork Kuskokwim River

The Middle Fork of the Kuskokwim River was determined eligible for inclusion in the National System based on its free-flowing characteristic and presence of ORVs for fish. A suitability determination was prepared for the Middle Fork of the Kuskokwim River based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately 52 miles (40percent) of this 131-mile waterway travels through BLM-managed lands, with the remaining crossing State owned lands. Per a navigability determination dated May 6, 1980, the BLM determined the river to be navigable from middle fork to the mouth of the Pitka Fork (BLM 1980a); however, this segment does not overlap portions of the river administered by the BLM.

Mineral and Energy Resource Activities: The Middle Fork Kuskokwim River crosses the Minchumina oil and gas basin and medium locatable mineral potential areas; however this waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: The Middle Fork of the Kuskokwim does not cross any special management areas.

Socioeconomic Environment: The Kuskokwim River flows past several Yup'ik communities, including the hub community of Bethel. The eligible river segment is within 1 mile of Red Devil and 10 miles of Sleetmute. Both communities are unincorporated census designated places within the Bethel Census Area. Red Devil has 15 residents and Sleetmute has 98 residents (ADLWD 2016). Residents of Sleetmute, Red Devil, and other communities along the Kuskokwim River rely heavily on subsistence foods. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. The city of Bethel, population 6,244, is a regional center for the area located along the Kuskokwim River.

The Kuskokwim Area fishery is importance to subsistence and commercial fisheries harvests for lower Kuskokwim River communities. Commercial fishing and processing provide important sources of seasonal income. A small number of sport fishing guides operate along the Kuskokwim River, with most located in the hub communities of Bethel and Aniak.

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** Approximately 52 miles (40percent) of this 131-mile waterway travels through BLM-managed lands, with the remaining crossing State owned lands. The BLM determined the river to be navigable from middle fork to the mouth of the Pitka Fork (BLM 1980a); however, this segment does not overlap portions of the river administered by the BLM.

Because the BLM only has management authority on non-navigable portions of the river that cross upland areas administered by the BLM, long-term protection of ORVs within the remaining 61 percent of the waterbody would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). Added protection of ORVs may be achieved through designation of the nominated Sheefish ACEC, which would encompass the 52 mile segment administered by the BLM. Additional protection would be provided though its designation as an HVW, also contemplated in the BSWI RMP/EIS. Due to the extreme remote location, the cost to access and administer this river would be high.

2. **The current land ownership status in the area.** Approximately 39 percent of the upland of the Middle Fork of the Kuskokwim River is administered by the BLM. The remaining waterway is owned by the State of Alaska.
3. **The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Sheefish ACEC currently contemplated in the BSWI RMP/EIS. Additional protection would be provided though its designation as an HVW, also contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed:

- Minerals – The Kuskokwim River crosses the Minchumina oil and gas basin, with potential of leasable mineral development. A small segment crosses medium locatable mineral potential. Per ANDR (1988), all State lands will remain open to new mineral entry. However, this waterbody is located in a low mineral potential mineral area (BLM 2017).
 - Transportation – This waterbody does not cross the proposed Road to Nome or the Yukon Delta Road corridors. However, the river may be used for boating in summer and is used for motorized transportation winter travel for hunting and trapping.
 - Authorization of Rights-of-Way and Designated Utility Corridors – There are no ROW applications that intersect the Middle Fork of the Kuskokwim River.
4. **The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
 5. **The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
 6. **The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
 7. **A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
 8. **The State/local government's capacity to manage and protect the ORVs on non-federal lands.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. This waterbody is also subject to management guideline provided in the Kuskokwim Area Plan (ADNR 1988).
 9. **The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No capacity beyond what is provided for in existing statutes and by the Kuskokwim Area Plan (ADNR 1988).

- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. The contribution to river or basin integrity.** This river is a tributary to the Middle Fork Kuskokwim River, an eligible WSR considered as part of this WSR study. Other waterbodies also considered eligible for inclusion in the National System (Salmon River (Nikolai), Bear Creek (Nickolai), Sullivan Creek, Sheep Creek, and the Pitka Fork Middle Fork River) are tributaries to this waterbody. Should this collection of eligible rivers, including the main stem of the Kuskokwim River, be included in the National System, a positive contribution to overall system and basin integrity of the Middle Fork of the Kuskokwim River would be achieved.
- 13. The potential for water resources development.** No known water resource projects.

Preliminary Suitability Determination

Base on this evaluation, **the Middle Fork of the Kuskokwim River was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's limited ability to effectively manage ORVs given the small portion of the river administered by the BLM. Because the majority of the river is owned by the State of Alaska, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and the Kuskokwim Area Plan (ADNR 1988). The BLM is contemplating additional management provisions to protect ORVs through the BSWI RMP/EIS, including the nominated Sheefish ACEC. Additional protection could be provided though designation as an HVW also being contemplated by the BSWI RMP/EIS.

3.2.7 North Fork Unalakleet River

The North Fork of the Unalakleet River was determined eligible for inclusion in the National System based on its free-flowing characteristic and presence of ORV for fish. A suitability determination was prepared for the North Fork of the Unalakleet River based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: This entire 48-mile waterway travels through BLM-managed lands. No navigability determination has been completed by the BLM for this waterway.

Mineral and Energy Resource Activities: North Fork Unalakleet River crosses the Galena oil and gas basin and the Lower Koyukuk coal basin; however this waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements). **Special Areas:** The entire North Fork of the Unalakleet crosses the existing Drainages to the Unalakleet River ACEC.

Socioeconomic Environment: The North Fork of the Unalakleet River is approximately 20 miles west of Kaltag and 26 miles east from Unalakleet. The City of Kaltag has a population of 172, and the City of Unalakleet has a population of 758 (ADLWD 2016). Kaltag is within the Yukon-Koyukuk Census Area and Unalakleet is within the Nome Census Area. Approximately 13.5 percent of Kaltag residents are below the poverty level and the median household income is \$28,750 (U.S. Census 2015). Approximately 14.9 percent of Unalakleet residents are below the poverty level and the median household income is \$68,015. Unalakleet serves as a hub community for surrounding villages. Most residents in the area are Alaska Natives.

Residents rely heavily on traditional subsistence foods (ADCced 2017). Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Approximately half of employees in Unalakleet are employed in local government (ADLWD 2015).

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** Current and potential uses on sections of this river are already subject to required operating procedures that protect the ORV, which includes critical designated existing Drainages of the Unalakleet River ACEC.
2. **The current land ownership status in the area.** 100percent of the upland of the North Fork of the Unalakleet River is administered by the BLM. No navigability determination for this waterbody has been prepared by the BLM.
3. **The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Protection of ORVs provided by the existing Drainages to the Unalakleet River ACEC. Additional protection ORVs may be provided by the nominated Unalakleet ACEC, the nominated Unalakleet River Watershed ACEC, and the HVWs currently contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed:

- Minerals - The North Fork of the Unalakleet River crosses the Minchumina oil and gas basin; areas of medium locatable mineral potential could be curtailed; however this waterbody is located in a low mineral potential mineral area (BLM 2017).
- Transportation –This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors.
- Motorized Travel –The North Fork of the Unalakleet River is used for year around motorized transportation.

Authorization of Rights-of-Way and Designated Utility Corridors: To the greatest extent possible, the BLM will avoid authorizing new ROW or designating/using transportation or utility corridors within the WSR boundary. Through the land use planning process and through project-level reviews, the BLM will determine if the ROW proposal is compatible with the river's classification and the protection and enhancement of river values. When developing or revising land use plans that include WSR, BLM would consider designating the WSR boundary as an exclusion or avoidance area. This river does not cross any locations pending ROW applications.

4. **The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
5. **The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
6. **The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
7. **A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
8. **An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. Additional protection of ORVs is provided by the existing Drainages to the Unalakleet River ACEC. At the state-level, the North Fork Unalakleet is managed, in part, by the Northwest Area Plan (ADNR 2008).
9. **The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional capacity beyond what is provided through existing statutes and by the Northwest Area Plan (ADNR 2008) is available.

- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. The contribution to river or basin integrity.** Protection of the North Fork of the Unalakleet by including in the National System, combined with the current protection provided by the Unalakleet WSR, could enhance basin integrity.
- 13. The potential for water resources development.** No known water resource projects exist of the North Fork of the Unalakleet River.

Preliminary Suitability Determination

Based on this evaluation, **the North Fork of the Unalakleet River was preliminarily determined to be not suitable for inclusion in the National System**. This determination is based on the lack of support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*), and the BLM's ability to effectively manage ORVs of the Unalakleet River through the Drainages of the Unalakleet River ACEC, the nominated Unalakleet ACEC, the Unalakleet Watershed ACEC, and the HVWs currently contemplated in the BSWI RMP/EIS. Also considered in this preliminary determination is the State of Alaska protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and in part, by the Northwest Area Plan (ADNR 2008).

3.2.8 Otter Creek (Anvik)

Otter Creek (Anvik) was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish. A suitability determination was prepared for Otter Creek (Anvik) based on objective attributes of the river and an evaluation of the 13 "suitability factors."

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: This entire 35 mile waterway travels through BLM-managed lands. No navigability determination has been completed by the BLM for this waterway.

Mineral and Energy Resource Activities: Otter Creek does not cross areas identified for high or medium leasable or locatable mineral potential.

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: Approximately 1.54 miles of this river intersects the existing Anvik River ACEC.

Socioeconomic Environment: Otter Creek is approximately 35 miles southeast of the city of St. Michael and 42 miles south of the city of Unalakleet. Both St. Michael and Unalakleet are within the Nome Census Area. The city of St. Michael has a population of 417 (ADLWD 2016) and about 92 percent of residents are Alaska Native (U.S. Census 2010). The city of Unalakleet has a population of 758 (ADLWD 2016). Most residents, approximately 78 percent, are Alaska Native (U.S. Census 2010).

Residents rely heavily on subsistence foods. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Approximately half of employees in Unalakleet are employed in local government (ADLWD 2015). Commercial fishing is another important industry. The unemployment rate within the Nome Census Area is 13.7 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** The State of Alaska owns 100% of this of this river, including access and use of the water, and subsurface lands; therefore the ability to effectively manage this creek and protect the identified value would be difficult.
- 2. The current land ownership status in the area.** The entirety of the upland of Otter Creek (Anvik) is administered by the BLM. No navigability determination has been completed by the BLM.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced:

Protection of ORV for fish would be enhanced through inclusion in the National System. Protection of ORVs provided by the existing Anvik River ACEC. Additional protection ORVs may be provided by the nominated Anvik River Watershed ACEC currently contemplated in the BSWI RMP/EIS; however it is not expected that either ACEC will provide sufficient long-term protection ORVs due to the low percentage of the river included in this ACEC. Protection of ORVs for fish could be enhanced through inclusion in an HVW, currently contemplated by the BSWI RMP.

Curtailed or Foreclosed: This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors. It does not cross areas identified for mineral potential. No other reasonably foreseeable future uses are identified for this river.

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.

- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. Protection of this important resource may be provided by the existing Anvik River ACEC. This waterbody is not managed per an existing ADNR Area Plan.
- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional capacity for management of ORVs by the State of Alaska beyond what is provided through existing statutes.
- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. The contribution to river or basin integrity.** This river is a tributary to the Anvik River, an eligible WSR considered as part of this WSR study. Theodore Creek, Swift River (Anvik), Otter Creek (Anvik), McDonald Creek, Canyon Creek, and Yellow River are all tributaries to the Anvik River, and are considered eligible WSRs. Should this collection of eligible rivers, including the main stem Anvik River, be included in the National System, a positive contribution to overall system and basin integrity would be achieved.
- 13. The potential for water resources development.** No known water resource projects exist in Otter Creek (Anvik).

Preliminary Suitability Determination

Based on this evaluation, **the North Fork of the Otter Creek (Anvik) was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's ability to effectively manage ORVs through the existing Anvik River ACEC. Additional protection for ORVs may be provided by the nominated Anvik River Watershed ACEC and inclusion in an HVW, both currently being contemplated by the BSWI RMP/EIS. Further, there is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841). This waterbody is not managed per an existing ADNR Area Plan.

3.2.9 Otter Creek (Tuluksak)

Otter Creek (Tuluksak) was determined eligible for inclusion in the National System based on its free-flowing characteristic and presence of ORVs for fish habitat.

A suitability determination was prepared for Otter Creek (Tuluksak) based on objective attributes of the river and an evaluation of the 13 “suitability factors”. Objective criteria are summarized below. The evaluation of suitability factors is provided in Table 3.11.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: An approximately 5-mile segment (18 percent) of this 27-mile waterbody crosses BLM-administered lands. No navigability determination has been completed by the BLM for this waterway.

Mineral and Energy Resource Activities: Otter Creek (Tuluksak) does not cross areas identified for high or medium leasable or locatable mineral potential.

Water Resources Development: No water resources development currently exists that would affect the river’s free-flowing condition. The river has a low potential for hydroelectric development based on its remoteness and lack of electric transmission infrastructure. No historic or current preliminary Federal Energy Regulatory Commission Permits or license applications exist.

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: This waterbody does not cross any special management areas.

Socioeconomic Environment: Otter Creek (Tuluksak) is approximately 33 miles from the community of Tuluksak, which has a population of about 363 residents (ADLWD 2016). Tuluksak is an unincorporated census designated place in the Bethel Census Area. The median household income for Tuluksak is \$23,214 and 75 percent of the population is below the poverty level (U.S. Census 2015). Most residents, approximately 95 percent, are Yup’ik Alaska Natives (U.S. Census 2010). Residents rely heavily on traditional subsistence foods (ADCED 2017). Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for

modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Approximately three-fourths of employed Tuluksak residents work in local government (ADLWD 2015). The City of Bethel is the regional hub for Tuluksak and other communities in the vicinity of Otter Creek. The median household income for Bethel is \$51,012 and the poverty rate is 25 percent (U.S. Census 2015). The unemployment rate within the Bethel Census Area is 14.9 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Current Administration and Funding Needs, if Designated: Additional funding would be required to manage Otter Creek (Tuluksak) as a WSR.

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** Because the BLM only has management authority in upland areas administered by the BLM, long-term protection of ORVs in the majority of the waterbody would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The ORVs may be protected by the inclusion of a segment on BLM lands within in a proposed HVW, as this action is currently being contemplated by the BSWI RMP/EIS. Due to the extreme remote location, the cost to access and administer this river would be high. This river intersects the existing Anvik river ACEC and the nominated Anvik River Watershed ACEC; consequently, protection of ORV's is not expected to be accomplished by designation of ACECs.
2. **The current land ownership status in the area.** Approximately 4.83 miles (18 percent) of this 26.83 mile creek passes through BLM-administered lands. No navigability determination has been completed by the BLM for this waterway.
3. **The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection may be provided through inclusion in an HVW, currently being contemplated through the BSWI RMP/EIS; however this segment would include a relatively small segment of the river.

Curtailed or Foreclosed:

- Minerals – Otter Creek (Tuluksak) does not cross any areas identified as having mineral potential.
- Transportation –This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors.
- Motorized Travel –Motorized boat travel is unlikely in the upper sections of Blackwater Creek administered by the BLM. Winter travel by snowmobile is highly likely.

- Authorization of Rights-of-Way and Designated Utility Corridors -This river does not cross any locations pending ROW applications.
4. **The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be added to the National System.
 5. **The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared-administration of the river should it be included in the National System.
 6. **The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
 7. **A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** Through scoping comment for the BSWI RMP/EIS, the State of Alaska maintained its opposition to WSR studies in the State; therefore, it is assumed the State will not participate in the preservation and administration of the river should it be included in the national system (see Criteria number 10).
 8. **An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. Otter Creek (Tuluksak) is managed, in its entirety, by the Bristol Bay Area Plan (ADNR 2013).
 9. **The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional capacity for management of ORVs by the State of Alaska beyond what is provided through existing statutes.
 10. **The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System (*see Section 3.1 and Appendix C*).
 11. **The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
 12. **The contribution to river or basin integrity.** Preservation of fish ORVs in Otter Creek (Tuluksak) could support larger conservation of fisheries in the Yukon River basin.
 13. **The potential for water resources development.** No known water resource projects exist for Otter Creek (Tuluksak).

Preliminary Suitability Determination

Based on this evaluation, **Otter Creek (Tuluksak) was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on concern for the BLM's ability to effectively manage ORVs given the small portion of the river administered by the BLM. Additional protection may be provided through inclusion in an HVW, currently being contemplated through the BSWI RMP/EIS; however this would include a relatively small segment of the river.

Because the majority of the river is owned by the State of Alaska, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and the Bristol Bay Area Plan (ADNR 2013).

3.2.10 Pitka Fork Middle Fork Kuskokwim River

The Pitka Fork Middle Fork Kuskokwim River was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish habitat and historic resources. A suitability determination was prepared for the Pitka Fork Middle Fork Kuskokwim River based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately 62 miles (68 percent) of this 92 mile waterway travels through BLM-managed lands, with the remaining crossing State owned lands. Per a navigability determination dated May 6, 1980, the BLM has determined this waterbody to be navigable to the confluence of the Salmon River (BLM 1980a); consequently, the submerged lands in navigable segments are the property of the State of Alaska up to the ordinary high water line. Of the 62.6 miles that travel through BLM-administered lands, approximately 1.1 mile was determined navigable by the BLM (BLM 1980a). Therefore, the BLM retains management authority within the majority of the river segment that crosses BLM-administered lands.

Mineral and Energy Resource Activities: The Pitka Fork Middle Fork Kuskokwim River crosses the Minchumina oil and gas basin; however this waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: Pitka Fork Middle Fork Kuskokwim River intersects the INHT Primary Route, the Iditarod NHT, and the Iditarod NHT Connecting Trails. No 17(b) easements are crossed.

Special Areas: Pitka Fork Middle Fork Kuskokwim River intersects the Iditarod NHT – BLM National Conservation Lands (federal ANILCA CSU).

Socioeconomic Environment: The eligible segment is approximately ten miles south of the community of Nikolai. Nikolai has 94 residents (ADLWD 2016), is an incorporated city within

the Yukon-Koyukuk Census Area. The regional center city of McGrath has 302 residents and is approximately 30 miles from the WSR segment. Most residents in Nikolai are Athabascan. Just over half of McGrath residents are Athabascan or other Alaska Native. Nikolai has a median household income of \$31,250, with approximately 15.5 percent of persons below the poverty level. McGrath has a higher median household income of \$63,654, and a similar poverty level of 18.2 percent.

Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Important employers include local government, retail stores owned by Alaska Native village corporations, commercial fishing, and fish processing. The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** Approximately 62 miles (68 percent) of this 92 mile waterway travels through BLM-managed lands, with the remaining crossing State owned lands. The BLM has determined this waterbody to be navigable to the confluence of the Salmon River (BLM 1980a). Of the 62.6 miles that travel through BLM-administered lands, approximately 1.1 mile was determined navigable by the BLM (BLM 1980a). Therefore, the BLM retains management authority of submerged lands within the majority of the river segment that crosses BLM-administered lands.

Because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs on segments of the river outside these areas would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). Protection of the ORV for fish may be provided by the nominated Sheefish ACEC (60.61 miles) and inclusion in an HVW, both currently being contemplated in the preferred alternative of the BSWI RMP/EIS.

- 2. The current land ownership status in the area.** Approximately 62 miles (68 percent) of this 92 mile waterway travels through BLM-managed lands, with the remaining crossing State owned lands. The BLM has determined this waterbody to be navigable to the confluence of the Salmon River (BLM 1980a); consequently, the submerged lands are the property of the State of Alaska up to the ordinary high water line. Of the 62.6 miles that travel through BLM-administered lands, approximately 1.1 mile was determined navigable by the BLM (BLM 1980a). Therefore, the BLM retains management authority within the majority of the river segment that crosses BLM-administered lands.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Sheefish ACEC and inclusion in an HWW, both currently contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed: This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors. No other reasonably foreseeable future uses are identified for this river. The Pitka Fork Middle Fork Kuskokwim River crosses the Minchumina oil and gas basin; however this waterbody is located in a low mineral potential mineral area (BLM 2017).

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the state.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. This waterbody is subject to management provisions of the Kuskokwim Area Plan (ADNR 1988).
- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional capacity is anticipated beyond what is currently provided by existing statutes and provisions of the Kuskokwim Area Plan (ADNR 1988).
- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of

additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).

12. The contribution to river or basin integrity. This river is a tributary to the Middle Fork of the Kuskokwim River, an eligible WSR considered as part of this WSR study. It is one of several tributaries also considered eligible for inclusion in the National System (Salmon River [Nikolai], Bear Creek [Nickolai], Sullivan Creek, Sheep Creek, and the Pitka Fork Middle Fork River). Should this collection of eligible rivers, including the main stem Middle Fork of the Kuskokwim River, be included in the National System, a positive contribution to overall system and basin integrity of the Middle Fork of the Kuskokwim River would be achieved.

13. The potential for water resources development. No known water resource projects.

Preliminary Suitability Determination

Based on this evaluation, **the Pitka Fork Middle Fork Kuskokwim River was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's ability to effectively manage ORVs through future management decisions, including the nominated Sheefish ACEC and inclusion in a designated HVW, both being contemplated in the preferred alternative of the BSWI RMP/EIS. Further, because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and the Kuskokwim Area Plan (ADNR 1988).

3.2.11 Salmon River (Nikolai)

The Salmon River (Nikolai) was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish habitat and historic resources. A suitability determination was prepared for the Salmon River based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately 21 miles (60 percent) of this 35 mile waterway travel through BLM-managed lands, with the remaining crossing Native and State owned. BLM has determined the first 3.5 miles of this waterbody to be navigable, per a navigability determination dated May 22, 1985 (BLM 1985); consequently, the submerged lands in navigable segments are the property of the State of Alaska up to the ordinary high water line. The navigable portion of the river overlaps with BLM-administered lands, thereby reducing the river miles managed by the BLM to approximately 19 miles.

Mineral and Energy Resource Activities: The Salmon River (Nikolai) crosses the Minchumina oil and gas basin. The Pitka Fork Middle Fork Kuskokwim River crosses the Minchumina oil and gas basin; however this waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: The Salmon River (Nikolai) intersects the Iditarod Sled Dog Race Route, the INHT Primary Route, and the Iditarod NHT – BLM National Conservation Lands (federal ANILCA CSU). No 17(b) easements are crossed.

Special Areas: The Salmon River (Nikolai) intersects the Iditarod NHT – BLM National Conservation Lands (federal ANILCA CSU).

Socioeconomic Environment: Sixty-one percent of this waterway travels through BLM-managed lands, with the remaining crossing Native and State owned. The BLM has no management jurisdiction on any section of this waterway; therefore the ability to effectively manage this river and protect the identified value would be difficult. Due to the extreme remote location, the cost to access and administer this river would be high. There is no local interest with designating this waterway.

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** The BLM manages the majority of the lands for this river, and has determined only the first 3.5 miles of this waterbody to be navigable (BLM 1985), and therefore the property of the State of Alaska up to the ordinary high water line.

Because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs would require a partnership with non-government organizations and the State of Alaska for approximately 10 percent of the river. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*).

2. **The current land ownership status in the area.** Approximately 21 miles (60 percent) of this 35 mile waterway travels through BLM-managed lands, with the remaining crossing Native and State owned. BLM has determined the first 3.5 miles of this waterbody to be navigable (BLM 1985); consequently, the submerged lands in navigable segments are the property of the State of Alaska up to the ordinary high water line. The navigable portion of the river overlaps with BLM-administered lands, thereby reducing the river miles managed by the BLM to approximately 19 miles.
3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Sheefish ACEC or through inclusion in an HVW, both currently contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed: This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors. Subject to valid and existing rights, mineral potential in the Minchumina oil and gas basin could be curtailed. However, this waterbody is located in a low mineral potential mineral area (BLM 2017).

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. The Salmon River (Nikolai) is also managed per the Kuskokwim Area Plan (ADNR 1988).
- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional capacity beyond what is provided by the Kuskokwim Area Plan (ADNR 1988) is available.
- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. The contribution to river or basin integrity.** This river is a tributary to the Middle Fork of the Kuskokwim River, an eligible WSR considered as part of this WSR study. It is one of several tributaries also considered eligible for inclusion in the National System (Salmon River [Nikolai], Bear Creek [Nickolai], Sullivan Creek, Sheep Creek, and the Pitka Fork Middle Fork River). Should this collection of eligible rivers, including the main stem Middle Fork of the Kuskokwim River, be included in the National System, a positive contribution to overall system and basin integrity of the Middle Fork of the Kuskokwim River would be achieved.

13. The potential for water resources development. No known water resource projects on the Salmon River (Nickolai).

Preliminary Suitability Determination

Based on this evaluation, **the Salmon River was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's ability to effectively manage ORVs through future management decisions, including the nominated Sheefish ACEC and inclusion in a designated HVW, both being contemplated in the preferred alternative of the BSWI RMP/EIS. Further, because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and the Kuskokwim Area Plan (ADNR 1988).

3.2.12 Sheep Creek

Sheep Creek was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish habitat. A suitability determination was prepared for Sheep Creek based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately 36 (57 percent) of this 61 mile waterway travels through BLM-managed lands, with the remaining crossing Alaska Native and State owned lands. No navigability determination has been completed by the BLM for this waterway.

Mineral and Energy Resource Activities: Sheep Creek crosses the Minchumina oil and gas basin; however, this waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: Sheep Creek does not cross any special management areas.

Socioeconomic Environment: The eligible river segment is approximately sixteen miles south of the community of Nikolai. Nikolai has 94 residents (ADLWD 2016), is an incorporated city within the Yukon-Koyukuk Census Area. The regional center city of McGrath has 302 residents and is approximately 30 miles from the eligible river segment. Most residents in Nikolai are Athabascan. Just over half of McGrath residents are Athabascan or other Alaska Native. Nikolai has a median household income of \$31,250, with approximately 15.5 percent of persons below the poverty level. McGrath has a higher median household income of \$63,654, and a similar poverty level of 18.2 percent. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace

some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Important employers include local government, retail stores owned by Alaska Native village corporations, commercial fishing, and fish processing. The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** Approximately 36 (57 percent) of this 61 mile waterway travels through BLM-managed lands, with the remaining crossing Alaska Native and State owned lands. No navigability determination has been completed by the BLM for this waterway. Because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). Additional protection ORVs may be provided by the nominated Sheefish ACEC and HVWs currently contemplated in the BSWI RMP/EIS
- 2. The current land ownership status in the area.** Approximately 36 (57 percent) of this 61 mile waterway travels through BLM-managed lands, with the remaining crossing Alaska Native and State owned lands. No navigability determination has been completed by the BLM for this waterway.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Sheefish ACEC and HVWs currently contemplated in the BSWI RMP/EIS

Curtailed or Foreclosed: Subject to valid and existing rights, mineral potential at the Minchumina oil and gas basin may be curtailed. However, this waterbody is located in a low mineral potential mineral area (BLM 2017). This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors. No other reasonably foreseeable future uses are identified for this river.

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.

7. **A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
8. **An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. Sheep Creek is located entirely within the Kuskokwim Area Plan planning area (ADNR 1988). The Area Plan provides management goals and guidelines for management of fish resources.
9. **The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional state and local capacity beyond what is provided through existing statutes and in the Kuskokwim Area Plan (ADNR 1988) is expected should the waterbody be included in the National System.
10. **The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (see Section 3.1 and Appendix C).
11. **The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
12. **Contribution to System or Basin Integrity.** This river is a tributary to the Middle Fork of the Kuskokwim River, an eligible WSR considered as part of this WSR study. It is one of several tributaries also considered eligible for inclusion in the National System (Salmon River [Nikolai], Bear Creek [Nickolai], Sullivan Creek, Sheep Creek, and the Pitka Fork Middle Fork River). Should this collection of eligible rivers, including the main stem Middle Fork of the Kuskokwim River, be included in the National System, a positive contribution to overall system and basin integrity of the Middle Fork of the Kuskokwim River would be achieved.
13. **The potential for water resources development.** No known water resource projects are planned for Sheep Creek.

Preliminary Suitability Determination

Based on this evaluation, **the Sheep Creek was preliminarily determined to be not suitable for inclusion in the National System.** This determination was based on the BLM's ability to effectively manage ORVs through future management decisions, including the nominated Sheefish ACEC and inclusion in a designated HVW, both being contemplated in the preferred alternative of the BSWI RMP/EIS. Additionally, because the BLM only has management authority in upland areas administered by the BLM or non-navigable portions of the river that crossed these areas, long-term protection of ORVs would require a partnership with non-

government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and the Kuskokwim Area Plan planning area (ADNR 1988).

3.2.13 Sullivan Creek

Sullivan Creek was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish and historic resources. A suitability determination was prepared for Sullivan Creek based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: This entire 22 mile waterway travels through BLM-managed lands. No navigability determination has been completed by the BLM for this waterway.

Mineral and Energy Resource Activities: Sullivan Creek crosses the Minchumina oil and gas basin; however, this waterbody is located in a low mineral potential mineral area (BLM 2017).

Transportation, Facilities, and Other Development: Sullivan Creek intersects the Iditarod Sled Dog Race Route, the INHT Primary Route, the Iditarod NHT, and the Iditarod NHT Connecting Trails. The routes are the main winter overland routes from the Kuksowkim valley to Southcentral Alaska.

Special Areas: Sullivan Creek intersect the Iditarod NHT – BLM National Conservation Lands (federal ANILCA CSU).

Socioeconomic Environment: The eligible segment is located south of the community of Nikolai. Nikolai has 94 residents (ADLWD 2016), is an incorporated city within the Yukon-Koyukuk Census Area. The regional center city of McGrath has 302 residents and is approximately 30 miles from the WSR segment. Most residents in Nikolai are Athabascan. Just over half of McGrath residents are Athabascan or other Alaska Native. Nikolai has a median household income of \$31,250, with approximately 15.5 percent of persons below the poverty level. McGrath has a higher median household income of \$63,654, and a similar poverty level of 18.2 percent.

Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Important employers include local government, retail stores owned by Alaska Native village corporations, commercial fishing, and fish processing. The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Current Administration and Funding Needs, if Designated: Additional funding would be required to manage Sullivan Creek as a WSR.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** The BLM currently manages the entire waterbody. No navigability determination has been completed by the BLM for this waterway. The INHT, which crosses two sections of this creek, does not contribute to making this river corridor a worthy addition to the WSR system. Additional protection ORVs may be provided by the nominated Sheefish ACEC and HVWs currently contemplated in the BSWI RMP/EIS. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*).
- 2. The current land ownership status in the area.** The waterbody is managed by the BLM as with BLM-managed lands occupying 100 percent of adjacent land.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Sheefish ACEC and HVWs currently contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed: Subject to valid and existing rights, mineral potential at the Minchumina oil and gas basin may be curtailed. However, this waterbody is located in a low mineral potential mineral area (BLM 2017). This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors. No other reasonably foreseeable future uses are identified for this river.

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the

following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. Sullivan Creek is located entirely within the Kuskokwim Area Plan planning area (ADNR 1988). The Area Plan provides management goals and guidelines for management of fish resources.

- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional State and local capacity beyond what is provided in the Kuskokwim Area Plan (ADNR 1988) is expected should the waterbody be included in the National System.
- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. Contribution to System or Basin Integrity.** This river is a tributary to the Middle Fork of the Kuskokwim River, an eligible WSR considered as part of this WSR study. It is one of several tributaries also considered eligible for inclusion in the National System (Salmon River [Nikolai], Bear Creek [Nickolai], Sullivan Creek, Sheep Creek, and the Pitka Fork Middle Fork River). Should this collection of eligible rivers, including the main stem Middle Fork of the Kuskokwim River, be included in the National System, a positive contribution to overall system and basin integrity of the Middle Fork of the Kuskokwim River would be achieved.
- 13. Potential for Water Resources Development.** No known water resource projects exist on Sullivan Creek.

Preliminary Suitability Determination

Based on this evaluation, **the Sullivan Creek was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's ability to effectively manage ORVs through future management decisions, including the nominated Sheefish ACEC and inclusion in a designated HVW, both being contemplated in the preferred alternative of the BSWI RMP/EIS. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and the Kuskokwim Area Plan planning area (ADNR 1988).

3.2.14 Swift River (Anvik)

The Swift River (Anvik) was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish and historic resources. A suitability

determination was prepared for the Swift River (Anvik) based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately the entire waterway travels through BLM-managed lands, with a small portion crossing the Yukon Delta National Wildlife Refuge. No navigability determination has been completed by the BLM for this waterway.

Mineral and Energy Resource Activities: The Swift River (Anvik) does not cross any areas identified for high or medium leasable or locatable mineral potential.

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: Approximately 1.36 miles of the Swift River (Anvik) crosses the existing Anvik River ACEC; the Yukon Delta National Wildlife Refuge.

Socioeconomic Environment: Swift Creek is approximately 23 miles east of Grayling, 34 miles northwest of Anvik, and 40 miles south of St. Michael. The city of Grayling has a population of 189 residents and is within the Yukon-Koyukuk Census Area (ADLWD 2016). Most residents, approximately 87 percent, are Alaska Native (U.S. Census 2010). Anvik has a population of 77 (ADLWD 2016). Anvik is a city within the Yukon-Koyukuk Census Area. Most residents, approximately 93 percent, are Alaska Natives (U.S. Census 2010). Anvik is home to the Deg Hit'an people. The city of St. Michael is within the Nome Census Area and has a population of 417 (ADLWD 2016). About 92 percent of residents are Alaska Native (U.S. Census 2010).

Area residents rely heavily on subsistence. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent and the unemployment rate within the Nome Census Area is 13.7 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** Ninety eight percent of this waterway travels through BLM-managed lands, with the remaining crossing the Yukon Delta National Wildlife Refuge. No navigability determination has been completed by the BLM for this waterway, therefore, BLM retains management of submerged lands within the majority of the river. Some protection may be provided where this river crosses the existing Anvik River ACEC near its mouth. Additional protection ORVs may be provided by the nominated Anvik River Watershed ACEC currently contemplated in the BSWI RMP/EIS; however, collectively the portion of the eligible river segment is small and may not provide protection for ORVs. ORVs may be protected in areas crossing the Yukon Delta National Wildlife Refuge (2 percent).

There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*).

- 2. The current land ownership status in the area.** Approximately all of this waterbody travels through BLM lands, with a small portion crossing the Yukon Delta National Wildlife Refuge.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Some protection may be provided where this river crosses the existing Anvik River ACEC near its mouth. Additional protection ORVs may be provided by the nominated Anvik River Watershed ACEC or inclusion in an HVW, both currently contemplated in the BSWI RMP/EIS; however, collectively the portion of the eligible river segment is small and may not provide protection for ORVs. ORVs may be protected in areas crossing the Yukon Delta National Wildlife Refuge (2 percent).

Curtailed or Foreclosed: This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors. No other reasonably foreseeable future uses are identified for this river. The Swift River (Anvik) does not cross any areas identified for high mineral potential.

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. The Swift River (Anvik) is not managed by the State of Alaska per an Area Plan.

- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional State and local capacity exist to support management of this waterbody as a WSR.
- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (see Section 3.1 and Appendix C).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. Contribution to System or Basin Integrity.** This river is a tributary to the Anvik River, an eligible WSR considered as part of this WSR study. The main stem Anvik River, from its headwaters to the border of BLM-administered and State-owned lands, approximately 15 miles upriver from the confluence with the Yukon River. Collectively, Theodore Creek, Swift River (Anvik), Otter Creek (Anvik), Canyon Creek, and Yellow River are all considered eligible WSRs. Should this collection of eligible rivers, including the main stem Anvik River, be included in the National System, a positive contribution to overall system and basin integrity would be achieved.
- 13. Potential for Water Resources Development.** No known water resource projects exist on the Swift River (Anvik)

Preliminary Suitability Determination

Based on this evaluation, **the Swift River (Anvik) was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's ability to effectively manage ORVs through future management decisions being contemplated in the preferred alternative of the BSWI RMP/EIS, including the existing Anvik River ACEC near its mouth (and the nominated Anvik River Watershed ACEC, and inclusion as an HVW). Additionally, there is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841). The Swift River (Anvik) is not managed by the State of Alaska per an Area Plan.

3.2.15 Tatlawiksuk River

The Tatlawiksuk River was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish resources. A suitability determination was prepared for the Tatlawiksuk River based on objective attributes of the river and an evaluation of the 13 "suitability factors".

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: Approximately 17 miles (21 percent) of this 81 mile waterway travels through BLM-managed lands, with the remaining crossing State and Alaska Native owned. Per the determination dated September 9, 1981, BLM has determined this waterbody to be navigable to Sec. 35, T. 25 N., R. 33 W., S.M. (BLM 1981); consequently, the submerged lands in navigable segments are the property of the State of Alaska up to the ordinary high water line. Approximately 2.2 miles of waterway that crosses BLM-lands was included in the segment determined to be navigable and is therefore the property of the State of Alaska up to ordinary high water mark.

Mineral and Energy Resource Activities: The Tatlawiksuk River does not cross any areas identified for high mineral potential.

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: The Tatlawiksuk River does not cross any special management areas.

Socioeconomic Environment: The Talawiksuk River eligible river segment is approximately 15 miles east of the community of Stony River. Stony River is an unincorporated census designated place within the Bethel Census Area with approximately 41 residents (ADLWD 2016). The median household income for Stony River is \$22,500 and 62.5 percent of the population is below the poverty level (U.S. Census 2015). Most residents are Athabascan or Yup'ik Alaska Natives (85 percent). Residents rely heavily on subsistence foods. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Over half of employed Stony River residents held jobs in local government (ADLWD 2015). The Tatlawiksuk River is a tributary of the Kuskokwim River used by salmon for spawning and rearing. The Kuskokwim Area fishery is importance to subsistence and commercial fisheries harvests for lower Kuskokwim River communities.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** Because the BLM only has management authority in upland areas administered by the BLM, long-term protection of ORVs in the majority of the waterbody would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The ORVs may be protected by the nominated Whitefish Spawning ACEC and the inclusion of the 17 mile segment on BLM lands within in an HVW currently being contemplated by the BSWI RMP/EIS. Due to the extreme remote location, the cost to access and administer this river would be high.
- 2. The current land ownership status in the area.** Approximately 17 miles (21 percent) of this 81 mile waterway travels through BLM-managed lands, with the remaining crossing State and Alaska Native owned. BLM has determined this waterbody to be navigable to Sec. 35, T. 25 N., R. 33 W., S.M. (BLM 1981); consequently, the submerged lands in navigable segments are the property of the State of Alaska up to the ordinary high water

line. Approximately 2 miles of river that crosses BLM-lands was included in the segment determined to be navigable and is therefore the property of the State of Alaska up to ordinary high water mark.

3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Additional protection ORVs may be provided by the nominated Whitefish Spawning ACEC or inclusion in an HVW, both currently contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed: This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors, or areas identified as having high mineral potential. No other reasonably foreseeable future uses are identified for this river.

4. The federal agency that will administer the area should it be added to the National System. The BLM is not proposing shared administration of this river should it be included in the National System.

5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies. Because the river is state-owned, administration of the river would be shared with the State of Alaska. The BLM is not proposing shared administration of this river.

6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System. Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.

7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System. During scoping, the State of Alaska maintained its opposition to WSR studies in the State.

8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development. The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. The Tatlawiksuk River is located entirely within the Kuskokwim Area Plan planning area (ADNR 1988). The Area Plan provides management goals and guidelines for management of fish resources.

9. The State/local government's capacity to manage and protect the ORVs on non-federal lands. The Tatlawiksuk River is managed per the Kuskokwim Area Plan (ADNR 1988). No additional State and local capacity beyond what is provided in the Kuskokwim Area Plan is expected should the waterbody be included in the National System.

10. The existing support or opposition of designation. There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments

adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).

- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. Contribution to System or Basin Integrity.** This waterbody is a tributary to the Swift River, which drains into the Anvik River. When considered alone, inclusion of this waterbody on the National System would not contribute to system or basin integrity. If considered in combination with other waterbodies of the Anvik River drainage also considered eligible (Theodore Creek, Swift River (Anvik), Otter Creek (Anvik), Canyon Creek, and Yellow River), a positive contribution to system integrity would be achieved.
- 13. Potential for Water Resources Development.** No known water resource projects exist on the Tatawiksuk River.

Preliminary Suitability Determination

Based on this evaluation, **the Tatlawiksuk River was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on concern for the BLM's ability to effectively manage ORVs given the low percentage of the river administered by the BLM. Because the majority of the river is owned by the State of Alaska, long-term protection of ORVs under the National System would require partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841), and the Kuskokwim Area Plan. Additionally, protection of ORVs on BLM-administered lands may be accomplished through the proposed Whitefish Spawning ACEC, and inclusion as an HVW, both of which are being contemplated in the preferred alternative of the BSWI RMP/EIS.

3.2.16 Theodore Creek

Theodore Creek was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish resources. A suitability determination was prepared for Theodore Creek based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: This entire 15-mile waterway travels through BLM-managed lands. No navigability determination has been completed by the BLM for this waterway.

Mineral and Energy Resource Activities: Theodore Creek does not cross any areas identified for high or medium leasable or locatable mineral potential.

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: Approximately 3.67 miles of this river crosses the existing Anvik River ACEC.

Socioeconomic Environment: Theodore Creek is approximately 18 miles east of the City of Anvik. Anvik is a city within the Yukon-Koyukuk Census Area. Most residents, approximately 93 percent, are Alaska Natives (U.S. Census 2010). Anvik is home to the Deg Hit'an people (ADLWD 2016). Area residents rely heavily on subsistence. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. The median household income for Anvik is \$26,563 and 16.3 percent of the population is below the poverty level (U.S. Census 2015). The Anvik River Lodge is 75 miles north of the City of Anvik. It attracts recreationists who sport fish on the Anvik River. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. Approximately three-fourths of employed Anvik residents work in local government (ADLWD 2015). The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** The BLM currently manages the entire waterbody, therefore, management decisions to protect ORVs could be considered through the planning process. However, there is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). Protection of ORVs is provided by the existing Anvik River ACEC. Additional protection ORVs may be provided by the nominated Anvik River Watershed ACEC and inclusion as an HVW, both currently contemplated in the BSWI RMP/EIS.
- 2. The current land ownership status in the area.** 100 percent of the upland of Theodore Creek is administered by the BLM. The waterway is owned by the State of Alaska.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Protection of ORVs is provided by the existing Anvik River ACEC. Additional protection ORVs may be provided by the nominated Anvik River Watershed ACEC and inclusion as an HVW, both currently contemplated in the BSWI RMP/EIS; however this area is relatively small.

Curtailed or Foreclosed: This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors, or areas identified as having high mineral potential. No other reasonably foreseeable future uses are identified for this river.

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.

- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** The State of Alaska, through the following statutes, provides protection to fisheries and the habitat: Anadromous Fish Act (AS 16.05.871-.901) and the Fishway or Fish Passage Act (AS 16.05.841). These provisions could assist in the preservation of fish ORVs. This waterbody is not protected by the State of Alaska under an Area Plan.
- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No local or State management capacity exists for this river.
- 10. The existing support or opposition of designation.** No local interest. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA.
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State has expressed that designation may impede or restrict the management of their State owned river.
- 12. Contribution to System or Basin Integrity.** This river is a tributary to the Anvik River, an eligible WSR considered as part of this WSR study. The main stem Anvik River, from its headwaters to the border of BLM-administered and State-owned lands, approximately 15 miles upriver from the confluence with the Yukon River. Collectively, Theodore Creek, Swift River (Anvik), Otter Creek (Anvik), Canyon Creek, and Yellow River are all considered eligible WSRs. Should this collection of eligible rivers, including the main stem Anvik River, be included in the National System, a positive contribution to overall system and basin integrity would be achieved.
- 13. Potential for Water Resources Development: Will proposed projects be forgone?** No known water resource projects exist on Theodore Creek.

Preliminary Suitability Determination

Based on this evaluation, **Theodore Creek was preliminarily determined to be not suitable for inclusion in the National System.** The BLM currently manages the entire waterbody; protection of ORVs is provided by the existing Anvik River ACEC. Additional protection ORVs may be

provided by the nominated Anvik River Watershed ACEC and inclusion as an HVW. Therefore, management decisions to protect ORVs could be considered through the planning process. However, because there is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*), management of ORVs through inclusion as an HVW, currently being contemplated by the BSWI RMP/EIS), and continued implementation of State-level protections is recommended. The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841). This waterbody is not protected by the State of Alaska under an Area Plan.

3.2.17 Yellow River

The Yellow River was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for fish resources. A suitability determination was prepared for the Yellow River based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: An approximately 70 miles (97 percent) of this 72 mile waterway travels through BLM-managed lands, with the remaining crossing Alaska Native owned. No navigability determination has been completed by the BLM for this waterway.

Mineral and Energy Resource Activities: The Yellow River does not cross any areas identified for high or medium leasable or locatable mineral potential.

Transportation, Facilities, and Other Development: No transportation networks exist within the river corridor (including 17(b) easements).

Special Areas: Approximately 3 miles of the Yellow River crosses the Anvik River ACEC.

Socioeconomic Environment: The Yellow River is approximately 12 miles east of the City of Grayling and 25 miles north of the City of Anvik. The City of Grayling has a population of 189 residents and is within the Yukon-Koyukuk Census Area (ADLWD 2016). Most residents, approximately 87 percent, are Alaska Native (U.S. Census 2010). Anvik has a population of 77 (ADLWD 2016) and is within the Yukon-Koyukuk Census Area.

Area residents rely heavily on subsistence. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. The unemployment rate within the Yukon-Koyukuk Census Area is 17 percent (ADLWD 2017). This is higher than the statewide unemployment rate of 6.8 percent and the national unemployment rate of 4.1 percent.

Suitability Factors

- 1. Characteristics that do, or do not, make the area a worthy addition to the National System.** The BLM retains management authority for approximately 70 mile (97 percent) of this 72 mile waterway. Although, management decisions to protect ORVs could be considered through the planning process, there is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*).
- 2. The current land ownership status in the area.** Approximately 97 percent of the upland of Yellow Creek is administered by the BLM. Navigability has not been determined for on this waterbody.
- 3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**

Enhanced: Protection of ORV for fish would be enhanced through inclusion in the National System. Protection of ORVs is provided by the existing Anvik River ACEC. Additional protection for ORVs may be provided by the nominated Grayling Area Habitat ACEC, the Unalakleet ACEC, and the HVWs currently contemplated in the BSWI RMP/EIS.

Curtailed or Foreclosed: This river does not cross the proposed Road to Nome or the Yukon Delta Road corridors, or areas identified as having high mineral potential. No other reasonably foreseeable future uses are identified for this river.

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer the river should it be included in the National System.
- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** This waterbody is not protected by the State of Alaska under an Area Plan. No other land use controls exist to manage identified ORVs.

- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional State capacity is expected beyond what is provided by the Alaska Department of Natural Resources Mining, Land & Water Program.
- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs or recommending additional segments adjacent to Doyon Native lands because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. Contribution to System or Basin Integrity.** This river is a tributary to the Anvik River, an eligible WSR considered as part of this WSR study. The main stem Anvik River, from its headwaters to the border of BLM-administered and State-owned lands, approximately 15 miles upriver from the confluence with the Yukon River. Collectively, Theodore Creek, Swift River (Anvik), Otter Creek (Anvik), Canyon Creek, and Yellow River are all considered eligible WSRs. Should this collection of eligible rivers, including the main stem Anvik River, be included in the National System, a positive contribution to overall system and basin integrity would be achieved.
- 13. Potential for Water Resources Development.** No known water resource projects exist on the Yellow River.

Preliminary Suitability Determination

Based on this evaluation, **the Yellow River was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's ability to effectively manage ORVs through future management decisions, including the existing Anvik River ACEC. Additional protection ORVs may be provided by the nominated Grayling Area Habitat ACEC, the Unalakleet ACEC, and the HVWs currently contemplated in the BSWI RMP/EIS. There is also currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to fisheries ORVs through the Anadromous Fish Act (AS 16.05.871-.901), the Fishway or Fish Passage Act (AS 16.05.841). This waterbody is not protected by the State of Alaska under an Area Plan.

3.2.18 Yukon River

The Yukon River was determined eligible for inclusion in the National System based on its free-flowing characteristic, and presence of ORVs for historic resources. A suitability determination was prepared for the Yukon River based on objective attributes of the river and an evaluation of the 13 “suitability factors”.

Objective criteria and suitability factors considered in this preliminary suitability determination are summarized below.

Objective Criteria

Land Ownership and Land Uses: An approximately 36.5 miles (3 percent) of this 1291.2 mile waterway travels through BLM-managed lands, with the remaining crossing other Alaska Native (251 miles), State (25.6 miles), and lands owned by other entities. The BLM has determined this waterway navigable.

Mineral and Energy Resource Activities: The Yukon River does/does not cross any areas identified for high or medium leasable or locatable mineral potential.

Transportation, Facilities, and Other Development: The Yukon River crosses 17(b) easements, including the Holy Cross to Reindeer/ein 2 C3, D1, D9 Lake and the Yukon River/ein 8 D1

Special Areas: The Yukon River crosses the Iditarod Race Route. The Yukon River does not cross any existing or proposed ACECs.

Socioeconomic Environment: The Yukon River traverses the State of Alaska. Within this broad geography, area residents rely heavily on subsistence. Subsistence is an important part of the local culture for local residents and is a valued way of life in rural Alaska. Subsistence is also part of a mixed economy. Cash inputs are necessary for modern harvest practices, but wild foods supplement or replace some of the need for wage employment. Employment opportunities in rural communities are scarce, with regional centers offering the greatest opportunity for jobs. The unemployment rate within many communities along the Yukon is approximately 6.6 percent (Galena), though may shift locally (ADLWD 2017).

Suitability Factors

1. **Characteristics that do, or do not, make the area a worthy addition to the National System.** The BLM retains management authority for approximately 36.5 miles (3 percent) of this 1291.2 mile waterway. Because the BLM only has management authority in upland areas administered by the BLM, long-term protection of ORVs in the majority of the waterbody would require a partnership with non-government organizations and the State of Alaska. There is currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The ORVs may be protected by the inclusion of an approximately 7 mile segment on BLM lands within in an HVW (currently being contemplated in the preferred alternative of the BSWI RMP/EIS).
2. **The current land ownership status in the area.** Approximately 3 percent of the upland of Yukon River is administered by the BLM. The Yukon River is considered navigable.
3. **The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the National System.**
 - **Enhanced:** Protection of ORV for history would be enhanced through inclusion in the National System. Protection of ORVs is not provided an existing land designation. Additional protection ORVs may be provided by the HVW currently contemplated in the preferred alternative of the BSWI RMP/EIS.
 - **Curtailed or Foreclosed:** This river does not cross the proposed Road to Nome or the Yukon to Kuskokwim energy corridor, or areas identified as having high mineral potential. No other reasonably foreseeable future uses are identified for this river.

- 4. The federal agency that will administer the area should it be added to the National System.** The BLM would administer this river segment should it be included in the National System.
- 5. The extent to which the agency proposes that administration of the river, including costs thereof, is shared by State and local agencies.** The BLM is not proposing shared administration of this river should it be included in the National System.
- 6. The estimated cost to the United States of acquiring necessary lands or interests in lands within the corridor, as well as the cost of administering the area should it be added to the National System.** Due to the remote location, the cost to access and administer this river is estimated to be very high, as discussed in Section 3.1.1 regarding funding needs to manage a WSR.
- 7. A determination of the extent that other federal agencies, the State, or its political subdivisions might participate in the preservation and administration of the rivers should it be proposed for inclusion in the National System.** During scoping, the State of Alaska maintained its opposition to WSR studies in the State.
- 8. An evaluation of local zoning and other land use controls in protecting the river's ORV and preventing incompatible development.** This waterbody is protected by the State of Alaska under the Yukon-Tanana Area Plan (ADNR 2014). This Plan specifies goals and objectives for the protection of heritage (historic) resources per the Alaska Historic Preservation Act. No other land use controls exist to manage this ORV.
- 9. The State/local government's capacity to manage and protect the ORVs on non-federal lands.** No additional State capacity is expected beyond what is provided by the Alaska Department of Natural Resources Mining, Land & Water Program.
- 10. The existing support or opposition of designation.** There is no State or local interest in including this waterbody in the National System. Public comment received during scoping opposed designating additional WSRs because doing so would impose significant restrictions on the access and use of the Doyon Native lands and would prevent the full economic benefits of those lands as intended by ANCSA (*see Section 3.1 and Appendix C*).
- 11. The consistency of designation with other agency plans, programs, policies in meeting regional objectives.** The State of Alaska has indicated that inclusion of additional rivers in the National System is in conflict with State goals and ANILCA Section 1326(b).
- 12. Contribution to System or Basin Integrity.** The Yukon River is a major watercourse in northwestern North America. The Anvik River, Middle Fork Kuskokwim River, Yellow River, Theodore Creek , Otter Creek (Anvik), and Otter Creek (Tuluksak) are each eligible rivers that drain into the Yukon River. Should the Yukon River be included in the National System, a positive contribution to overall system and basin integrity would occur.
- 13. Potential for Water Resources Development: Will proposed projects be forgone?** No known water resource projects exist on the Yukon River.

Preliminary Suitability Determination

Based on this evaluation, **the Yukon River was preliminarily determined to be not suitable for inclusion in the National System**. This determination was based on the BLM's ability to effectively manage the historic ORV through future management decisions, given the limited ownership on the river and its current use as an international commerce shipping route. There is also currently no support for inclusion of this waterbody in the National System by relevant Alaska Native corporations or the State of Alaska (*see Section 3.1 and Appendix C*). The State of Alaska will continue to provide protection to the historic ORV through the Alaska Historic Preservation Act. This waterbody is protected by the State of Alaska under an Area Plan.

4. Next Steps

Although the Wild and Scenic River Study provides a preliminary suitability determination, the final recommendation of eligible rivers as suitable for inclusion in the National System is completed through the RMP/EIS process. In the BSWI DRMP/DEIS, this recommendation was contemplated in the following Alternatives:

- Alternative A: All eligible rivers continue to be managed as such per guidelines provided in BL (2012).
- Alternative B: All eligible rivers are recommended as suitable for the inclusion in the National System
- Alternative C and D: All eligible rivers are eliminated from further consideration for inclusion in the National System.

Management actions common to all action alternatives would apply to those rivers recommended as suitable, and subsequently added to National System through designation by Congress.

Information on management actions common to all and alternative-specific management actions is provided in *Environmental Analysis Report Volume 2: Description of Alternatives* (BLM 2018xb).

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Appendix A

Region of Comparison

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Appendix A Table 1. Outstandingly Remarkable Values Eligibility Criteria and Region of Comparison

Outstandingly Remarkable Values	Criteria (BLM 2012)	Region of Comparison
Scenic	<p>The landscape elements of landform, vegetation, water, color, and related factors result in notable or exemplary visual features and/or attractions. The BLM Visual Resource Inventory Handbook, H-8410-1, may be used in assessing visual quality and in evaluating the extent of development upon scenic values. The rating area must be scenic quality "A" as defined in the BLM Visual Resource Inventory Handbook. When analyzing scenic values, additional factors, such as seasonal variations in vegetation, scale of cultural modifications, and the length of time negative intrusions are viewed, may be considered. Scenery and visual attractions may be highly diverse along the majority of the river or river segment.</p>	<p>The region of comparison for scenery encompasses the entire state of Alaska.</p>
Recreational	<p>Recreational opportunities within the subject river corridor are, or have the potential to be, popular enough to attract visitors from throughout or beyond the region of comparison or are unique or rare within the region. River-related opportunities include, but are not limited to, sightseeing, interpretation, wildlife observation, camping, photography, hiking, fishing, hunting, and boating. Such a recreational opportunity may be an outstandingly remarkable value without the underlying recreational resource being an outstandingly remarkable value (e.g., fishing may be an outstandingly remarkable value without the fish species being an outstandingly remarkable value). The river may provide settings for national or regional usage or competitive events.</p>	<p>The region of comparison for Recreation is the state of Alaska, based on the assumption that recreators will travel long distances to access a particular river segment within the BSWI planning area. Common recreational opportunities are found in the regional area.</p>
Geologic	<p>The river area contains one or more examples of a geologic feature, process, or phenomenon that is unique or rare within the region of comparison. The feature(s) may be in an unusually active stage of development, represent a "textbook" example, and/or represent a unique or rare combination of geologic features (erosional, volcanic, glacial, or other geologic features).</p>	<p>The region of comparison is areas of state or regional geologic importance in Alaska.</p>
Fish	<p>Fish values include either indigenous fish populations or habitat or a combination of these river-related conditions.</p> <p>Populations. The river is nationally or regionally an important producer of indigenous resident and/or anadromous fish species. Of particular significance is the presence of wild stocks and/or Federal or state listed or candidate, threatened, endangered, or BLM sensitive species. Diversity of species is an important consideration and could, in itself, lead to a determination that it is an outstandingly remarkable value.</p> <p>Habitat. The river provides exceptionally high-quality habitat for fish species indigenous to the region of comparison. Of particular significance is habitat for wild stocks and/or Federal or state listed or candidate, threatened, endangered, or BLM sensitive species. Diversity of habitat is an important consideration and could, in itself, lead to a determination that it is an outstandingly remarkable value.</p>	<p>The region of comparison is based on each species.</p>

Outstandingly Remarkable Values	Criteria (BLM 2012)	Region of Comparison
Wildlife	<p>Wildlife values include either terrestrial or aquatic wildlife populations or habitat or a combination of these conditions.</p> <p>Populations. The river, or area within the river corridor, contains nationally or regionally important populations of indigenous wildlife species dependent on the river environment. Of particular significance are species considered to be unique to the area and/or populations of Federal or state listed or candidate, threatened, endangered, or BLM sensitive species. Diversity of species is an important consideration and could, in itself, lead to a determination that it is an outstandingly remarkable value.</p> <p>Habitat. The river, or area within the river corridor, provides exceptionally high-quality habitat for wildlife of national or regional significance and/or may provide unique habitat or a critical link in habitat conditions for Federal or state listed or candidate, threatened, endangered, or BLM sensitive species. Contiguous habitat conditions are such that the biological needs of the species are met. Diversity of habitat is an important consideration and could, in itself, lead to a determination that it is an outstandingly remarkable value.</p>	The region of comparison is the entire range of that species, especially genetically unique, threatened, endangered, and sensitive species.
Cultural	<p>The river or area within the river corridor contains a site(s) where there is evidence of occupation or use by Native Americans. Sites must be rare, have unusual characteristics, or exceptional human-interest value(s). sites may have national or regional importance for interpreting prehistory; may be rare; may represent an area where culture or cultural period was first identified and described; may have been used concurrently by two or more cultural groups; or may have been used by cultural groups for rare or sacred purposes. Likely candidates include sites that are eligible for the National Register of Historic Places at the national or regional level, but are not limited to sites that meet the NHPA definition of a historic property (36 CFR 800.4 and 36 CFR 800.16(l)).</p>	The region of comparison is the area of potential for the discovery of cultural resources and is based on the extent and number of known cultural sites in the area and the type of resources found in the region (e.g., a corridor providing important access and fishery resources, traditional game hunting area, native village). This would increase the likelihood of a discovery if a survey were conducted. To date, approximately 5% of Alaska has been surveyed for historic or pre-historic sites.
Historic	<p>The river, or area within the river corridor, has scientific value or contains a rare or outstanding example of a district, site, building, or structure that is associated with an event, person, or distinctive style. The cultural resource was primarily used by Euroamericans after 1741, the point of European contact in Alaska. Likely candidates include sites that are eligible for the National Register of Historic Places at the national level or have been designated a national historic landmark by the Secretary of the Interior</p>	The region of comparison is the area of potential for the discovery of historic resources and is based on the extent and number of known historic sites in the area and the type of resources found in the region (e.g., a corridor providing important access and fishery resources, traditional game hunting area, native village). This would increase the likelihood of a discovery if a survey were conducted. To date, approximately 5% of Alaska has been surveyed for historic or pre-historic sites.

Appendix B

Eligibility Study Results

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Appendix B Table 1. BLM Anchorage Field Office Inventory Table, Watercourses Analyzed & Tentative Classification

Table Notes:

ORVS = Outstandingly Remarkable Values Studied

1. Shading indicates water course determined eligible as ORV.
2. The letter "Y" indicates "YES", meaning the value was determined to meet ORV criteria. The letter "C" indicates "Considered," meaning the value was considered further but determined not to be an ORV.
3. The letter "W" indicates tentative classification of wild. The letter "S" indicates tentative classification of scenic. The letter "R" indicates tentative classification of recreational.
4. "Region" is defined on the scale of an administrative unit, a portion of a state, or an appropriately scaled physiographic or hydrologic unit.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
American Creek	7.69	7.69	Yes											S022N052W. Not eligible-no ORV found.
Anakeksik Creek	1.00	1.00	Yes											K014S008W. Not eligible-no ORV found.
Anvik River Determined eligible.	150.36	118.97	Yes	C	C		Y	C	Y	Y		W	Yukon River.	S030N058W. Found eligible for its fish, cultural, and historic resource values; tentatively classified as Wild.
Arvesta Creek	41.97	41.97	Yes											K004S001W. Not eligible-no ORV found.
Atchuelinguk River	105.28	0.12	Yes											S026N070W. Not eligible-no ORV found.
Barnhard Creek	12.11	12.11	Yes											S025N044W. Not eligible-no ORV found.
Bear Creek (Aniak)	20.20	3.56	Yes											S011N060W. Not eligible-no ORV found.
Bear Creek (Chuathbaluk)	3.63	0.66	Yes											S018N051W. Not eligible-no ORV found.

Bering Sea-Western Interior Resource Management Plan

Report on Wild & Scenic River Eligibility and Suitability

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Bear Creek (Kaltag)	34.76	25.02	Yes											K021S004W. Not eligible-no ORV found.
Bear Creek (Nikolai) Determined eligible.	51.36	41.03	Yes				Y		Y			W	Kuskokwim R.	S032N028W. Found eligible for its fish and historic resource values; tentatively classified as Wild.
Beaver Creek (Anvik)	37.81	37.81	Yes											S032N061W. Not eligible-no ORV found.
Beaver Creek (Flat)	22.26	22.26	Yes											S026N043W. Not eligible-no ORV found.
Beaver Creek (McGrath)	43.71	9.88	Yes											S030N035W. Not eligible-no ORV found.
Bell Creek	20.99	12.21	Yes											S021N049W. Not eligible-no ORV found.
Benjamin Creek	1.11	1.11	Yes											K022S012W. Not eligible-no ORV found.
Big Bend Slough	11.39	1.07	Yes											S023N059W. Not eligible-no ORV found.
Big River Determined eligible.	136.57	35.14	Yes	C	C		Y	C				W	Kuskokwim R.	S033N030W. Found eligible for its fish resource values; tentatively classified as Wild.
Big Waldren Fork	46.48	12.50	Yes											S029N039W. Not eligible-no ORV found.
Big Yetna River	141.84	4.53	Yes											K027S003E. Not eligible-no ORV found.
Black River	55.47	13.06	Yes											S029N034W. Not eligible-no ORV found.
Blackburn Creek	19.94	12.80	Yes											K024S005W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Blackwater Creek Determined eligible.	67.38	12.16	Yes			Y						W	Kuskokwim R.	S033N030W. Found eligible for its fish resource values; tentatively classified as Wild.
Blueberry Creek	3.95	0.64	Yes											K018S011W. Not eligible-no ORV found.
Bobs Creek	1.61	0.78	Yes											S021N068W. Not eligible-no ORV found.
Bonanza Creek	62.80	14.95	Yes											S026N048W. Not eligible-no ORV found.
Bonasila River	134.45	111.52	Yes			C	C							S028N059W. Not eligible-no ORV found.
Bonasila Slough	7.01	4.59	Yes			C								S028N059W. Not eligible-no ORV found.
Boulder Creek	9.18	4.55	Yes											K024S022E. Not eligible-no ORV found.
Box River	41.69	41.69	Yes											K001S002E. Not eligible-no ORV found.
Brass Pan Creek	12.42	12.42	Yes											K010S005W. Not eligible-no ORV found.
Cale Creek	7.13	2.85	Yes											S011N060W. Not eligible-no ORV found.
California Creek	4.86	3.31	Yes											S021N046W. Not eligible-no ORV found.
Can Creek	38.12	17.19	Yes											S014N032W. Not eligible-no ORV found.
Canyon Creek Determined eligible.	15.58	15.58	Yes			Y	C					W	Yukon R.	K026S011W. Found eligible for its fish resource values; tentatively classified as Wild.

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Report on Wild & Scenic River Eligibility and Suitability

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Caribou Creek	22.11	22.11	Yes											K005S002W. Not eligible-no ORV found.
Caribou Snare Creek	17.55	12.24	Yes											S013N036W. Not eligible-no ORV found.
Cascade Creek	6.94	2.72	Yes											K021S011W. Not eligible-no ORV found.
Central Creek	5.19	2.13	Yes											S021N047W. Not eligible-no ORV found.
Cheeneetnuk River	70.43	21.18	Yes				C							S020N037W. Not eligible-no ORV found.
Chiroskey River	58.27	54.44	Yes											K018S009W. Not eligible-no ORV found.
Clear Fork	39.86	18.02	Yes											S033N024W. Not eligible-no ORV found.
Coal Mine Creek	4.27	0.17	Yes											K020S011W. Not eligible-no ORV found.
Cobalt Creek	17.29	14.05	Yes											S020N055W. Not eligible-no ORV found.
Cottonwood Creek	17.17	6.09	Yes											K024S022E. Not eligible-no ORV found.
Cottonwood Slough	2.15	2.15	Yes											S023N058W. Not eligible-no ORV found.
Crevice Creek	4.25	0.73	Yes											S022N049W. Not eligible-no ORV found.
Dads Creek	2.86	1.03	Yes											S021N068W. Not eligible-no ORV found.
Deep Creek (Denali NP)	1.60	1.60	Yes											F017S028W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Deep Creek (Marshall)	3.14	1.31	Yes											S019N070W. Not eligible-no ORV found.
Deepbank Creek	44.36	6.03	Yes											S033N024W. Not eligible-no ORV found.
Dennis Creek	46.44	8.62	Yes											K027S028E. Not eligible-no ORV found.
Derby Creek	50.22	50.22	Yes											K005N002W. Not eligible-no ORV found.
Discovery Creek	97.39	15.66	Yes											S016N062W. Not eligible-no ORV found.
Doestock Creek	47.37	7.50	Yes											S017N056W. Not eligible-no ORV found.
Doherty Creek	14.80	14.80	Yes											S025N044W. Not eligible-no ORV found.
Downey Creek	16.70	14.38	Yes											S021N046W. Not eligible-no ORV found.
Dry Creek	3.46	1.64	Yes											S010N061W. Not eligible-no ORV found.
Dugan Creek	10.64	9.51	Yes											K023S004W. Not eligible-no ORV found.
Eagle Creek	14.25	5.28	Yes											S009N058W. Not eligible-no ORV found.
East Fork Andreafsky River	143.29	1.23	Yes			C								S023N076W. Not eligible-no ORV found.
East Fork George River	67.27	39.22	Yes											S022N045W. Not eligible-no ORV found.
East Fork Kuskokwim River	72.50	0.02	Yes			C								K027S022E. Not eligible-no ORV found.

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Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
East Fork Kuyukutuk River	9.60	5.38	Yes											S022N068W. Not eligible-no ORV found.
Eden Creek	36.42	0.63	Yes											K020S026E. Not eligible-no ORV found.
Egavik Creek	8.43	7.66	Yes											K014S008W. Not eligible-no ORV found.
Eightmile Creek	11.63	5.86	Yes											S020N046W. Not eligible-no ORV found.
Ekolina Creek	9.00	0.42	Yes											K027S027E. Not eligible-no ORV found.
Eldorado Creek	9.26	0.83	Yes											S027N043W. Not eligible-no ORV found.
Elephant Creek	2.44	1.10	Yes											S021N069W. Not eligible-no ORV found.
Engineer Creek	19.69	7.53	Yes											S019N070W. Not eligible-no ORV found.
Fairbanks Creek	17.99	17.99	Yes											S027N048W. Not eligible-no ORV found.
Faith Creek	5.01	1.03	Yes											S020N069W. Not eligible-no ORV found.
First Fork Selatna River	25.43	7.45	Yes											S028N035W. Not eligible-no ORV found.
Fish Creek	50.87	3.99	Yes											F011S026W. Not eligible-no ORV found.
Fish River	6.90	5.50	Yes											F017S028W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Fisher Creek	13.67	2.83	Yes											S009N058W. Not eligible-no ORV found.
Flat Creek	7.20	0.01	Yes											K023S023E. Not eligible-no ORV found.
Fog River	78.55	18.34	Yes											S012N065W. Not eligible-no ORV found.
Foraker River	7.07	2.46	Yes											F012S023W. Not eligible-no ORV found.
Fuller Creek	16.12	5.17	Yes											S020N045W. Not eligible-no ORV found.
Gagaryah River	63.16	22.67	Yes											S018N035W. Not eligible-no ORV found.
Galickson Creek	9.64	1.30	Yes											K029S015E. Not eligible-no ORV found.
George River	93.25	27.79	Yes											S021N046W. Not eligible-no ORV found.
Getmuna Creek	24.26	11.55	Yes											S021N049W. Not eligible-no ORV found.
Gisasa River	99.25	73.71	Yes							C		Regional		K002S006E. Paleontology. Not eligible-no ORV found.
Glacier Creek	12.59	2.36	Yes											S025N048W. Not eligible-no ORV found.
Goblet Creek	22.12	18.70	Yes											S030N060W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Golsovia River	54.55	52.89	Yes				C							K022S012W. Not eligible-no ORV found.
Grayling Creek	22.18	0.26	Yes											S033N057W. Not eligible-no ORV found.
Hardscrabble Creek	25.09	0.00	Yes											K023S027E. Not eligible-no ORV found.
Hawk River	61.35	61.35	Yes											S028N063W. Not eligible-no ORV found.
Highpower Creek	27.95	17.49	Yes											K024S030E. Not eligible-no ORV found.
Holokuk River	53.65	1.07	Yes											S017N051W. Not eligible-no ORV found.
Home Creek	1.24	0.54	Yes											S021N068W. Not eligible-no ORV found.
Honhosa River	74.92	48.51	Yes							C		Regional		K001N005E. Paleontology. Not eligible-no ORV found.
Hot Spring Creek	3.62	3.62	Yes											S013N059W. Not eligible-no ORV found.
Iditarod River	336.58	116.11	Yes	C										K028S001W. Not eligible-no ORV found.
Innoko River	384.78	11.91	Yes					C						S024N057W. Not eligible-no ORV found.
Innoko Slough	29.64	9.18	Yes											S022N056W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Inowak Creek	30.06	19.19	Yes											S019N042W. Not eligible-no ORV found.
Jackson Creek (Anvik)	47.19	47.19	Yes											S030N063W. Not eligible-no ORV found.
Jackson Creek (YK NWR)	18.83	0.40	Yes											S032N065W. Not eligible-no ORV found.
Jenson Creek	8.87	0.50	Yes											K021S004W. Not eligible-no ORV found.
Jesse Creek	5.00	1.28	Yes											K020S011W. Not eligible-no ORV found.
Joe Wise Creek	2.12	0.79	Yes											S020N070W. Not eligible-no ORV found.
Johns Creek	1.35	0.52	Yes											S021N068W. Not eligible-no ORV found.
Jones Creek	45.45	1.26	Yes											K028S025E. Not eligible-no ORV found.
Kako Creek	41.09	19.00	Yes											S020N066W. Not eligible-no ORV found.
Kalasik Creek	32.33	32.33	Yes											K009S001E. Not eligible-no ORV found.
Kaltag River	30.76	5.01	Yes											K013S001E. Not eligible-no ORV found.
Karl Creek	15.28	14.92	Yes											S008N061W. Not eligible-no ORV found.
Kateel River	158.37	120.42	Yes							C		Regional		K001N006E. Paleontology. Not eligible-no ORV found.

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Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Katlitna River	74.00	38.46	Yes											S032N034W. Not eligible-no ORV found.
Khuchaynik Creek	28.96	20.43	Yes			C							Kuskokwim R.	S029N028W. Not eligible-no ORV found.
Klikitarik River	19.75	16.60	Yes											K023S014W. Not eligible-no ORV found.
Kogoyuk Creek	15.05	0.61	Yes											S016N051W. Not eligible-no ORV found.
Kolmakof River	52.00	49.83	Yes											S017N053W. Not eligible-no ORV found.
Koserefski River	35.27	29.50	Yes											S025N058W. Not eligible-no ORV found.
Kuskokwim River	505.98	1.83	Yes	C	C	C	C	C				W	Regional	S007N073W. Not eligible-no ORV found.
Kuyukutuk River	65.11	14.55	Yes											S024N070W. Not eligible-no ORV found.
Little Creek	12.23	12.23	Yes											S023N051W. Not eligible-no ORV found.
Little East Fork	16.75	16.01	Yes											S026N041W. Not eligible-no ORV found.
Little Lockwood Creek	16.49	10.07	Yes											S027N064W. Not eligible-no ORV found.
Little Moose Creek	10.77	3.43	Yes											S026N043W. Not eligible-no ORV found.
Little Selatna River	17.30	11.71	Yes											S028N035W. Not eligible-no ORV found.
Little South Fork	33.00	33.00	Yes											S024N043W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Little Tonzona River	82.61	21.98	Yes											S033N026W. Not eligible-no ORV found.
Little Underhill Creek	44.65	0.76	Yes											S013N031W. Not eligible-no ORV found.
Little Waldren Fork	16.04	5.77	Yes											S028N041W. Not eligible-no ORV found.
Little Yetna River	62.69	0.94	Yes											S032N049W. Not eligible-no ORV found.
Long Creek	3.89	0.03	Yes											S028N046W. Not eligible-no ORV found.
Lynx Creek	13.26	6.18	Yes											F012S027W. Not eligible-no ORV found.
McDonald Creek	15.30	15.30	Yes			C						W	Yukon R.	K023S008W. Not eligible-no ORV found.
McNeill Creek	4.87	1.68	Yes											S020N069W. Not eligible-no ORV found.
Michigan Creek	26.23	21.66	Yes											S025N043W. Not eligible-no ORV found.
Middle Fork Buckland River	36.65	13.15	Yes											K004N006W. Not eligible-no ORV found.
Middle Fork Kuskokwim River Determined eligible.	131.49	51.94	Yes			Y		Y	C		W	Regional. National (INHT). Yukon R.		S033N030W. Found eligible for its fish habitat and historic resource values; tentatively classified as Wild.
Montana Creek	21.48	19.40	Yes											S023N051W. Not eligible-no ORV found.
Moose Creek (E Fk George R)	20.88	6.27	Yes											S025N041W. Not eligible-no ORV found.

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Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Moose Creek (Flat)	8.47	5.29	Yes											S026N046W. Not eligible-no ORV found.
Moose Creek (Stony River)	44.12	34.58	Yes											S020N041W. Not eligible-no ORV found.
Mountain Creek	30.34	27.74	Yes											S022N062W. Not eligible-no ORV found.
Munther Creek	3.19	3.19	Yes											S026N041W. Not eligible-no ORV found.
Muskeg Creek	23.09	1.67	Yes											S018N039W. Not eligible-no ORV found.
Nageethluk River	99.01	33.11	Yes				C							S026N069W. Not eligible-no ORV found.
Netletna River	46.83	1.79	Yes											K028S001W. Not eligible-no ORV found.
Nixon Fork	110.96	9.05	Yes											K028S017E. Not eligible-no ORV found.
No Creek	34.71	1.93	Yes											S033N024W. Not eligible-no ORV found.
North Fork George River	31.22	29.22	Yes											S023N045W. Not eligible-no ORV found.
North Fork Jones Creek	38.79	11.33	Yes											K028S026E. Not eligible-no ORV found.
North Fork Kuskokwim River	235.12	42.05	Yes											K019S029E. Not eligible-no ORV found.
North Fork Swift River	36.05	0.30	Yes											S016N032W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
North Fork Unalakleet River Determined eligible.	47.96	47.96	Yes			Y						W	Unalakleet R.	K017S007W. Found eligible for its fish resource values; tentatively classified as Wild.
North River	70.99	43.76	Yes	C										K019S010W. Not eligible-no ORV found.
Nulato River	82.59	3.72	Yes											K009S004E. Not eligible-no ORV found.
Nulato River	62.37	47.73	Yes											K005N010E. Not eligible-no ORV found.
Nunsatuk River	39.31	0.15	Yes											S026N037W. Not eligible-no ORV found.
Old Woman River	55.72	55.72	Yes				C							K017S006W. Not eligible-no ORV found.
Ophir Creek (Crooked Crk)	4.84	0.27	Yes											S023N048W. Not eligible-no ORV found.
Ophir Creek (Lower Kalskag)	20.17	6.91	Yes											S015N060W. Not eligible-no ORV found.
Oskawalik River	52.12	24.40	Yes											S019N049W. Not eligible-no ORV found.
Otter Creek (Aniak) Determined eligible.	26.83	4.83	Yes			Y						W	Yukon R.	K026S011W. Found eligible for its fish resource values; tentatively classified as Wild.
Otter Creek (Anvik) Determined eligible.	34.83	34.83	Yes			Y	C					W	Yukon R.	K026S011W. Found eligible for its fish resource values; tentatively classified as Wild.
Otter Creek (Flat)	33.41	3.52	Yes											S027N048W. Not eligible-no ORV found.
Owhat River	42.37	4.59	Yes											S017N056W. Not eligible-no ORV found.

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Paimiut Slough	76.16	26.84	Yes											S021N059W. Not eligible-no ORV found.
Paradise Creek	35.74	35.36	Yes											S028N059W. Not eligible-no ORV found.
Pedro Creek	6.28	6.28	Yes											S025N049W. Not eligible-no ORV found.
Pingston Creek	44.37	13.67	Yes											K028S029E. Not eligible-no ORV found.
Pitka Fork Middle Fork Kuskokwim River Determined eligible.	91.91	62.26	Yes			F					W	Kuskokwim R. watershed.		S033N029W. Found eligible for its fish resource values; tentatively classified as Wild.
Pitka River	44.60	32.05	Yes							C		Regional		K001N005E. Paleontology. Not eligible-no ORV found.
Point Creek	4.55	1.14	Yes											K021S011W. Not eligible-no ORV found.
Poker Creek	9.33	7.11	Yes											K021S012W. Not eligible-no ORV found.
Ponluktule Creek	1.96	1.96	Yes											K022S012W. Not eligible-no ORV found.
Powers Creek	7.71	2.91	Yes											K018S011W. Not eligible-no ORV found.
Quinn Creek	11.28	11.28	Yes											S022N052W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Rabbit Creek	7.79	3.00	Yes											K019S009W. Not eligible-no ORV found.
Rainy Creek	6.63	6.63	Yes											S022N052W. Not eligible-no ORV found.
Red Devil Creek	1.55	1.24	Yes											S019N044W. Not eligible-no ORV found.
Reindeer River	79.25	43.33	Yes						C	C			Regional	S024N056W. Not eligible-no ORV found.
Return Creek	6.99	1.01	Yes											S023N051W. Not eligible-no ORV found.
Roberts Creek	20.04	20.04	Yes											S029N062W. Not eligible-no ORV found.
Rodo River	11.54	1.18	Yes											K016S002W. Not eligible-no ORV found.
Ruby Creek	5.85	5.85	Yes											S027N045W. Not eligible-no ORV found.
Runkels Creek	10.88	10.88	Yes											K029S011W. Not eligible-no ORV found.
Salmon River (Aniak)	52.64	9.50	Yes											S011N056W. Not eligible-no ORV found.
Salmon River (Nikolai) Determined eligible.	34.87	21.33	Yes			F						W	Kuskokwim R.	S032N028W. Found eligible for its fish resource values; tentatively classified as Wild.
Seal Oil Creek	8.78	8.78	Yes						C				Regional	K022S012W. Not eligible-no ORV found.
Selatna River	52.02	38.78	Yes											S028N035W. Not eligible-no ORV found.
Sethkokna River	4.92	4.92	Yes											K019S027E. Not eligible-no

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														ORV found.
Shaktoolik River	106.38	31.47	Yes				C						K013S013W. Not eligible-no ORV found.	
Sheep Creek Determined eligible.	61.09	35.60	Yes			Y						W	Kuskokwim R.	S031N028W. Found eligible for its fish resource values; tentatively classified as Wild.
Shellman Creek	12.78	0.00	Yes											K021S028E. Not eligible-no ORV found.
Shisnona River	15.69	4.07	Yes											K024S030E. Not eligible-no ORV found.
Shoeleather Creek	24.95	14.36	Yes											S022N033W. Not eligible-no ORV found.
Short Creek	4.64	4.64	Yes											S032N062W. Not eligible-no ORV found.
Shorty Creek	4.76	4.38	Yes											K023S013W. Not eligible-no ORV found.
Simon Creek	20.10	12.21	Yes											K026S006W. Not eligible-no ORV found.
Slate Creek (Aniak)	16.61	9.78	Yes											S010N061W. Not eligible-no ORV found.
Slate Creek (Crooked Crk)	2.98	2.98	Yes											S023N052W
Small Creek	6.51	6.51	Yes											S023N052W. Not eligible-no ORV found.
Smith Creek	15.10	4.41	Yes											S024N050W. Not eligible-no ORV found.
South Fork George River	33.48	6.31	Yes											S022N045W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
South Fork Huslia River	188.76	71.39	Yes											K006N010E. Not eligible-no ORV found.
South Fork Kuyukutuk River	9.64	3.24	Yes											S021N068W. Not eligible-no ORV found.
South Fork Nulato River	64.15	27.81	Yes											K009S003E. Not eligible-no ORV found.
South River	44.76	23.79	Yes											K019S010W. Not eligible-no ORV found.
Spruce Creek (Marshall)	12.94	6.63	Yes											S020N070W. Not eligible-no ORV found.
Spruce Creek (Unalakleet)	7.37	2.89	Yes											K021S012W. Not eligible-no ORV found.
Stanstrom Creek	3.84	3.84	Yes											S027N060W. Not eligible-no ORV found.
Starr Creek	5.50	5.29	Yes											S025N044W. Not eligible-no ORV found.
Steamboat Creek	16.28	12.49	Yes											S021N046W. Not eligible-no ORV found.
Stink Creek	31.06	20.07	Yes											K017S002W. Not eligible-no ORV found.
Stone Creek	5.15	0.00	Yes											K022S027E. Not eligible-no ORV found.
Stony River	195.88	17.70	Yes				C	C	C			Local. Regional		S019N040W. Not eligible-no ORV found.
Stove Creek	7.89	7.89	Yes											K018S007W. Not eligible-no ORV found.
Stuyahok River	94.31	89.37	Yes											S028N062W. Not eligible-no ORV found.

Bering Sea-Western Interior Resource Management Plan

Report on Wild & Scenic River Eligibility and Suitability

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Sue Creek	16.62	12.61	Yes											S017N051W. Not eligible-no ORV found.
Sullivan Creek Determined eligible.	21.85	21.85	Yes				Y		Y			W	Regional. National (INHT). Kuskokwim R.	S031N028W. Found eligible for its fish habitat and historic resource values; tentatively classified as Wild.
Summer Camp Creek	5.25	1.30	Yes											K020S011W. Not eligible-no ORV found.
Sunset Creek	3.19	2.03	Yes											S033N036W. Not eligible-no ORV found.
Suter Creek	18.30	12.10	Yes											S017N053W. Not eligible-no ORV found.
Swift Creek	69.16	3.70	Yes											S017N057W. Not eligible-no ORV found.
Swift Fork	76.73	0.50	Yes											K022S028E. Not eligible-no ORV found.
Swift River (Anvik) Determined eligible.	31.76	31.22	Yes				Y					W	Kuskokwim R.	K028S011W. Found eligible for its fish resource values; tentatively classified as Wild.
Swift River (Lime Village)	124.75	51.46	Yes					C						S021N038W. Not eligible-no ORV found.
Tagagawik River	148.81	72.55	Yes											K012N002W. Not eligible-no ORV found.
Takotna River	125.86	6.14	Yes											S033N033W. Not eligible-no ORV found.
Tango Creek	13.40	7.50	Yes											S026N048W. Not eligible-no ORV found.

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes
Tatlawiksuk River Determined eligible.	80.76	17.01	Yes			Y						W	Kuskokwim R.	S021N038W. Found eligible for its fish resource values; tentatively classified as Wild.
Tea Creek	7.38	2.13	Yes											K018S009W. Not eligible-no ORV found.
Tenmile River	24.28	24.28	Yes											K016S005W. Not eligible-no ORV found.
Theodore Creek Determined eligible.	15.35	15.35	Yes			Y						W	Yukon R.	S031N061W. Found eligible for its fish resource values; tentatively classified as Wild.
Thompson Creek	45.85	35.15	Yes											K027S006W. Not eligible-no ORV found.
Timber Creek	14.06	3.33	Yes											S025N048W. Not eligible-no ORV found.
Tom Gray Creek	13.63	5.08	Yes											S024N067W. Not eligible-no ORV found.
Tonlhona Creek	19.99	9.64	Yes											S033N028W. Not eligible-no ORV found.
Tonzona River	81.62	35.46	Yes											K026S027E. Not eligible-no ORV found.
Trail Creek	14.23	0.98	Yes											S028N048W. Not eligible-no ORV found.
Unalakleet River	103.70	76.92	Yes	C	C	C		C	C	C				K019S011W. Undesignated segment found not eligible-no ORV found.
Ungalik River	108.97	19.08	Yes											K011S011W. Not eligible-no ORV found.
Veahna Creek	23.12	2.90	Yes											S017N050W. Not eligible-no ORV found.

Bering Sea-Western Interior Resource Management Plan

Report on Wild & Scenic River Eligibility and Suitability

Watercourse ¹	Total Length (miles)	BLM Length (miles)	Free Flowing Determination	ORVS ² for Scenic	ORVS ² for Recreation	ORVS ² for Geological	ORVS ² for Fish	ORVS ² for Wildlife	ORVS ² for Historic	ORVS ² for Cultural	ORVS ² for Other	Tentative Classification ³	Region of comparison , if value found ⁴	Notes	
Von Frank Creek	13.29	0.02	Yes											K024S023E. Not eligible-no ORV found.	
Vreeland Creek	30.71	4.80	Yes											S019N044W. Not eligible-no ORV found.	
Wagon Box Creek	4.80	4.80	Yes											K023S013W. Not eligible-no ORV found.	
West Fork Shellman Creek	8.81	2.13	Yes											K021S028E. Not eligible-no ORV found.	
White Mountain Creek	2.53	0.02	Yes											K022S024E. Not eligible-no ORV found.	
Widgeon Creek	7.60	2.90	Yes											S026N047W. Not eligible-no ORV found.	
Wilhelmina Creek	4.28	2.33	Yes											S009N058W. Not eligible-no ORV found.	
Willow Creek (Anvik)	8.44	8.44	Yes											S032N062W. Not eligible-no ORV found.	
Willow Creek (Flat)	7.29	1.95	Yes											S026N048W. Not eligible-no ORV found.	
Windy Fork Middle Fork Kuskokwim River	74.79	33.51	Yes											S031N029W. Not eligible-no ORV found.	
Woods Creek	9.36	2.26	Yes											K023S004W. Not eligible-no ORV found.	
Yellow River Determined eligible.	72.27	70.16	Yes	C	C	Y	C			W	Yukon R.			S033N060W. Found eligible for its fish resource values; tentatively classified as Wild.	
Yukon River Determined eligible.	214.29	13.24	Yes	C	C	C	Y		C	C	W	Regional			S021N074W. Found eligible for its fish resource values; tentatively classified as Wild.

Appendix C

Public Comments

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Appendix C Table 1. Public comment pertaining to river values and the Wild and Scenic River Study for the BSWI Planning Area

Comment	Source
<p>Residents wondered why the Nulato River System was not given a higher aquatic resource rating, and noted its importance to the Kaltag. Summary of discussion:</p> <ul style="list-style-type: none"> • Community member noted interest in discussing local watersheds and aquatic resource values. • Kateel River pointed out by community on the Aquatic Resource Value Map; no comment given on its value rating. • Community: Why is the Nulato system not given a high aquatic resource value rating? The Nulato has a lot of anadromous species of fish. • BLM: There is more than just the species that went into the model—diversity of fish, habitat conditions, and productivity all went into the determination. Points were given for each factor. We do realize that the creeks and rivers on the east side of the Nulato Hills are important for salmon. • Community: Is it because you have two forks of the Nulato River? The Nulato system has some of the most diverse and enormous amount of fish utilized for subsistence in this whole area. The other streams don't have large villages right at the mouth of the river. Fish and Game has it as one of its top monitoring streams. • Community: There is a lot of activity from our village on the Nulato River and the Kaltag Creek. The numbers don't seem to reflect the local importance of these areas. 	<p>Kaltag Preliminary Alternatives Meeting, 3/4/15</p>
<p>Spawning areas, regardless of what kind of fish they are, I would not allow anyone to disturb it. Have you ever been to Nyac? That is 30 miles of devastation, from one side of the drainage to the other. It's unreal. That river has not recovered. They disturbed the headwaters. It's a crime. You cannot reclaim nature; there is no way to put back what you lost. You cannot regulate, change, or manage nature. No matter how they try to reclaim anything, it will never go back to its original state.</p>	<p>Upper Kalskag Preliminary Alternatives Meeting, 3/11/15</p>
<p>Some of those streams we may not go there in the summer, but maybe we use an area in the winter. If they say there is no trespassing on this land, will it affect our access to an area? BLM response: If we put limits on mining or other activities, it will not affect subsistence access.</p>	<p>Upper Kalskag Preliminary Alternatives Meeting, 3/11/15</p>
<p>Discussion of placer mining disturbance to riparian areas included a question from BLM regarding potential future management. BLM is considering limits to the percent of a watershed that is disturbed at any one time. Placer mining operations would be required to reclaim areas before moving on to adjacent areas. Would you support that kind of concept?</p>	<p>Upper Kalskag Preliminary Alternatives Meeting, 3/11/15</p>

Comment	Source
<p>Community response: Our subsistence is so important to us, why even disturb the spawning areas? We are having pressure to not fish. Why even disturb a stream for salmon spawning? There are many impacts in the high seas; they are disturbing everything, even the bottom fish. It's common sense. If you are destroying the spawning grounds, you are destroying the species, and you are destroying our subsistence. Those fish go back to where they were born. Why allow boats to go way up those little streams where fish are spawning? They snag fish and stuff like that. They shouldn't be disturbing fish once they have reached their spawning grounds.</p>	
<p>Aniak River is a high priority; a lot of our fish come from Aniak River. I don't know if it is on BLM land or not. There are a lot of cabins in that area, and that is where the fish spawn. BLM response: If it is on BLM land, we can regulate the numbers of cabins. What kind of cabins are they? Mining? Subsistence? Community response: I don't know if people are keeping track of whose land the cabins are on.</p>	Lower Kalskag Preliminary Alternatives Meeting, 3/11/15
<p>It would be good to set buffers for riparian areas and limits for how much can be disturbed at any given time. If you allow disturbance from mining or other activities, it would ruin the habitat. We do not want to allow disturbance. We want to keep where our animals reproduce and spawn safe, so we continue to have the food. We want to keep our way of life, our food and animals, so we always have a place to go.</p>	Lower Kalskag Preliminary Alternatives Meeting, 3/11/15
<p>Limits on mining sounds like good idea. Stay out of the spawning habitat in streams.</p>	Russian Mission Preliminary Alternatives Meeting, 3/12/15
<p>The watershed behind town is important and part of that is on BLM land. The community uses the untreated water source. One time we had a fire and it went up that way. It might be good if there were fewer trees around the boundary. Maybe thin the trees in that area. But our animals depend on those trees; do not cut too many. It may be good not to have firewood cutting in that area.</p>	Russian Mission Preliminary Alternatives Meeting, 3/12/15
<p>Watch the waters carefully. We depend on them and what is in them. We support you to protect the water.</p>	Russian Mission Preliminary Alternatives Meeting, 3/12/15
<p>We are in favor of an ACEC, especially for fish protection, not landscape wide, but a specific ACEC for an important area. Individualized recommendations for important areas.</p>	Russian Mission Preliminary Alternatives Meeting, 3/12/15
<p>"On jet units, can you guys stop the sport fishermen from operating over the spawning habitat—Salmon River, Aniak River drainage, East Fork, Kickuk, head of Buckstock, all tributaries that drain into the Aniak River that drains into the Kuskokwim River."</p>	Aniak Preliminary Alternatives Meeting, 3/16/15 (written comment submission at meeting)
<p>There are too many regulations as it is, particularly on fishing. Summary of discussion:</p> <ul style="list-style-type: none"> • We want more local control for subsistence resources. • The people who use the resource know what to do to take care of it. 	Crooked Creek Preliminary Alternatives Meeting, 3/17/15

Comment	Source
<ul style="list-style-type: none"> • We had to wait to go fishing for king salmon here, but commercial fishing was going on by people from Seattle in Bristol Bay. • Don't lump us in with more populated areas. There are not enough people here to make a big dent in fish resources. • There was a time when we would just ignore regulations, but now there are too many to do that. • Last year a man went to catch a sheefish for dinner, and got a \$250 fine for fishing for king salmon. • It is intrusive to have our boats inspected. 	
<p>We are worried about the spillover of regulations from other rivers to our river. We do not want the rivers we use to become non-motorized areas.</p>	<p>Crooked Creek Preliminary Alternatives Meeting, 3/17/15</p>
<p>Series of questions on fish weirs. Summary of discussion:</p> <ul style="list-style-type: none"> • Where are fish weirs, and does BLM work with them? BLM: There is a weir in Unalakleet where we partnered with Alaska Department of Fish and Game. We intercepted every anadromous fish over a six-week period and wanted to know why king (chinook) salmon populations have declined. • Do the weirs affect the spawning of the fish? BLM: Alaska Department of Fish and Game are responsible for weirs. Weirs do funnel fish and that gives some stress, but it is very minimal impact to those going upstream. • Were there more fish after the wish weir? BLM: Chinook runs are still less and less each year. There are many theories for why, but we do not know for certain why they have declined. • Why are they using the weir? In past there were no weirs, who use them now? BLM: The state did use sonar in the past, but it cannot travel the distance of a very broad river mouth. A weir is inconvenient to local people because they need to use a special gate. Scientists feel there is a tradeoff from the inconvenience vs. the knowledge gained from the weir. In some places, they feel the knowledge outweighs the inconvenience. 	<p>Crooked Creek Preliminary Alternatives Meeting, 3/17/15</p>
<p>The Nulato River provides drinking water for the community of Nulato, and is an important resource to protect. The entire Nulato watershed is important to us. The Nulato River is an important spawning creek.</p>	<p>Nulato Preliminary Alternatives Meeting, 3/24/15</p>
<p>The rivers around Nulato are important subsistence resources. All hunting and fishing is done near the Nulato or Yukon River. The Koyukuk River is also important in between Nulato and Galena. Subsistence activities are not done in the village, but on the river. The Koyukuk Flats are also important. There are berry picking areas only accessible by river</p>	<p>Nulato Preliminary Alternatives Meeting, 3/24/15</p>

Comment	Source
The river is important for transportation. I would not want to live where there is no river.	Nulato Preliminary Alternatives Meeting, 3/24/15
We harvest most of our wood from the river corridor.	Nulato Preliminary Alternatives Meeting, 3/24/15
The November 2013 notes from scoping show a lot of concern for the Nulato River. We get fish and our drinking water from the Nulato River, and it is very important to our community. There is an ACEC on the Nulato River. We would like to expand this area back there if possible. We discussed a wilderness area designation with Stacey Fritz in the Fairbanks office. Stacey told us it is difficult to get a wilderness designation, but an ACEC is easier to get.	Nulato Preliminary Alternatives Meeting, 3/24/15
"Clean water, clean air, protection of habitats"	Unalakleet Preliminary Alternatives Meeting, 3/26/15 (written comment submission from Frances Degnan at meeting)
For fisheries, protection of spawning grounds is important.	Unalakleet Preliminary Alternatives Meeting, 3/26/15
For priority fish species, where does the Unalakleet River rank? Looking at the small population of the Unalakleet, it is very unique. We have like 8 or 9 species here.	Unalakleet Preliminary Alternatives Meeting, 3/26/15
It looks like a number of the headwaters of the Kuskokwim River are potential Wild and Scenic Rivers. This area is also where the pipeline for the proposed Donlin Gold Mine would be located. Are these things mutually exclusive? Can you have a Wild and Scenic River and also permit the Donlin Gold pipeline to cross them?	Anchorage Preliminary Alternatives Meeting, 3/19/15
Smelt – Lower Kusko residents rely heavily upon the smelt that spawn all the way upriver toward and maybe past Kalskag, but never really too far beyond Kalskag. Nobody knows where the smelt go to spawn (Pike Lake) or, if they are river spawners?	Bethel Scoping Meeting, 11/20/13
River traffic from Lower Kuskokwim villages is common very far upriver, above Bethel, for moose hunting	Bethel Scoping Meeting, 11/20/13
Travel occurs by river from Bethel to McGrath to hunt moose as far up as McGrath. Kongiginak, Napaskiak folks boat upriver (September) in fall to McGrath	Bethel Scoping Meeting, 11/20/13
About 99 allotments exist along the Unalakleet River. Concern was expressed for potential management agreement between the State of Alaska and the BLM over river/water management. The BLM and state should manage the river in partnership. The Native Village of Unalakleet indicated they would be willing to be part of any future management agreement.	Unalakleet Scoping Meeting, 11/22/13

Comment	Source
The most important resource in the Unalakleet River and all its tributaries/watershed is the fresh clean water because it supports all life forms. “It provides clean water and clean land” that support fish, berry, bear, and firewood resources.	Unalakleet Scoping Meeting, 11/22/13
There is a connection between Grayling and the “Holicluck” area up the Innoko River (Fish & Wildlife Service lands). Many from Grayling travel up the Innoko for fishing and hunting (on FWS lands).	Grayling Scoping Meeting, 12/17/13
The Anvik River is very important to the people of Anvik. There are some people outside of Anvik who may do some trapping or moose hunting near the Anvik River.	Grayling Scoping Meeting, 12/17/13
The Big River is the primary spawning area for sheefish, also known as incoono, for the entire Kuskokwim. It is very important for the entire Kuskokwim River for the sheefish population. Many studies have been done and ADF&G would have these studies. A large portion of the Big River is on BLM land.	McGrath Scoping Meeting, 1/9/14
The South Fork of the Kuskokwim River is very important for cisco and sheefish.	McGrath Scoping Meeting, 1/9/14
Upstream of Nikolai is the only place that Bering cisco spawn for the entire Kuskokwim watershed.	McGrath Scoping Meeting, 1/9/14
The Cheeneetnuk (lower-portion crosses BLM, upper on State land) and the Tatlawiksuk (small portion of lower and headwaters on BLM) are also very important for fishing.	McGrath Scoping Meeting, 1/9/14
“Nevertheless, Donlin notes that several of the river segments determined to be eligible for classification under the Wild and Scenic Rivers Act do overlap Donlin’s proposed pipeline corridor, in the same area covered by BLM’s proposed Sheefish Spawning ACEC, discussed above. Donlin also notes with concern that BLM’s 2012 Wild and Scenic Rivers Policy guidance provides (at p. 7-5) as follows: To the greatest extent possible, the BLM will avoid authorizing new rights-of-way within the WSR boundary. The BLM will, through appropriate land use planning processes and project-level reviews, exercise its discretion to deny applications for right-of-way grants in WSRs if the BLM determines through appropriate environmental analysis that the right-of-way proposal is not compatible with the river’s classification and the protection and enhancement of river values. Given BLM’s written policy, Donlin is and will remain wary of any Wild and Scenic River classification on river segments that overlap Donlin’s proposed pipeline corridor.”	Written comment submission by Donlin Gold, Anchorage, 5/11/15 (during Preliminary Alternatives)
“The BSWI area needs to address navigable waters issues before contemplating additional reserves such as wild and scenic rivers. This will have a bearing on land ownership access etc. State ownership of waters should also be cited and acknowledged.”	Written comment submission, Alaska Miners Association, Anchorage, 5/28/15 (during Preliminary Alternatives)
“AMA submits the following specific comments on Preliminary Alternatives Concept Report (69 page document issued during Preliminary Alternatives Outreach Period):	Written comment submission, Alaska Miners Association, Anchorage, 5/28/15

Comment	Source
<p>Realty Alternatives – Withdrawals – page 34. This section is very confusing and is not consistent with the alternatives presented for Locatable Minerals in Section 3.6. AMA supports an alternative that would revoke existing, obsolete ANCSA d-1 withdrawals (see previous discussion) and opposes alternatives that close (withdraw) “Suitable” Wild and Scenic Rivers, Riparian Conservation Areas, Sheefish spawning areas and the Nulato Hills Ecoregion as proposed in Alternative 1. BLM has not provided justification for such closures and withdrawals.”</p>	(during Preliminary Alternatives)
<p>“AMA offers the following comments on these specific ACEC proposals.</p> <p>Anvik River – Section 3.3.1 --- On pages 10---11, the “Important Value – More than locally significant” is that the Anvik River drains into the Yukon River, and the Yukon is internationally significant due to the 2002 Yukon River Salmon Agreement. Using this logic, all BLM lands in the entire Yukon River drainage could qualify as an ACEC, which clearly is not the intent of FLPMA. As AMA previously noted, BLM has failed to explain what makes the Anvik River unique on a state or national level, and why can’t these resources be protected under existing state and federal regulations.”</p>	Written comment submission, Alaska Miners Association, Anchorage, 5/28/15 (during Preliminary Alternatives)
<p>“Several Nikolai Citizens own Native Allotments, Hunting and Fish Camps on or near several of the Salmon River, Pitka Fork or other Upper Kuskokwim Drainages that are slated to become Wild and Scenic Rivers. Setting onerous Regulations for activities on these Rivers can only cause serious adverse consequences. These Drainages are more placid than wild. If you really want a Wild River please Designate the South Fork of the Kuskokwim from Rohn to Nikolai. At medium or high water a raft, canoe or kayak trip down that stream would encounter several Sweepers and potential overturned boats. Plus the daily views of the Alaska Range Weather permitting are truly Scenic unlike the proposed Rivers that pass through Alder Jungles and muddy Banks with little Scenic Views. Additional human use of these drainages may also scare off what Wildlife now exists. The Kuskokwim King Salmon Fishery Populations have plummeted to almost nonexistence and a Wild and Scenic Classification may totally destroy the Runs.”</p>	Written comment submission, Roger Jenkins, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“The report indicates several of the rivers determined to be eligible are within an existing ACEC designation. We assume that is considered additional justification for a river’s eligibility determination, although that is unclear. We request BLM consider these designations separately. Layering designations is redundant and is likely to cause unnecessary confusion when considering the hierarchy associated with any competing authorities and management prescriptions.”</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>Further, the eligibility report lacks the detailed information necessary to evaluate a river’s eligibility. Each of the 22 rivers considered eligible identifies fish resources as an Outstandingly Remarkable Values (ORV), and the fish resource was the sole ORV for 17 of the rivers. However,</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and

Comment	Source
<p>the vast majority of the descriptions lack even a brief description of the fish resources beyond saying the river is “crucial fish habitat.” The descriptions for the following 15 rivers lack any identification of the fish resource or why it is outstandingly remarkable, and make no mention of species, habitat type, or any other fisheries-related information: • Page 13, 2.2.2 Bear Creek (Nikolai) • Page 14 2.2.4 Black Water Creek • Page 14 2.2.5 Canyon Creek • Page 14 2.2.6 Khuchaynik Creek • Page 16 2.2.9 Middle Fork of the Kuskokwim River • Page 16 2.2.10 North Fork Unalakleet River • Page 16 2.2.11 Otter Creek (Aniak) • Page 16 2.2.12 Otter Creek (Anvik) • Page 17 2.2.13 Pitka Fork Middle Fork Kuskokwim River • Page 17 2.2.14 Salmon River (Nikolai) • Page 17 2.2.15 Sheep Creek • Page 17 2.2.16 Sullivan Creek • Page 18 2.2.17 Swift River (Anvik) • Page 18 2.2.19 Theodore Creek • Page 20 2.2.21 Yellow River We request that BLM briefly describe the fish resource and why it is outstandingly remarkable for each of the eligible rivers.</p>	Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“We also request BLM describe its area of consideration for comparative analysis per BLM Manual 6400. The table often simply states “Regional” without describing the boundaries of what is considered regional. Also, some areas of comparative analysis appear too small, such as using the Unalakleet River as the area of consideration for evaluating the North Fork of the Unalakleet River.”</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“The only historic resource identified in the report is the Iditarod National Historic Trail. It is unclear why the presence of the INHT constitutes an ORV for these rivers, considering the INHT crosses myriad waterways over its 2300-mile length.”</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“The description of the Anvik River, which has ORVs for cultural and historic values, only states that “This river corridor which appears to provide important access and fishery resources suggest a moderate to high potential for the discovery of cultural resources.” The Middle Fork Kuskokwim and Sullivan Creek have a historic ORV, but the only justification is that the INHT is within the area of those rivers. We request the BLM further describe why these historic and cultural resources are outstandingly remarkable, and describe its area of consideration for comparative analysis beyond simply stating “Regional.””</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“Section 2.2, Explanations of the Eligibility Determination for 22 Waterways, indicates that numerous waterway descriptions simply identify “fish resources” as outstandingly remarkable values yet fail to describe how the fish resources are outstandingly remarkable.”</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and

Comment	Source
	Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
“It would be useful to compare the waterways deemed eligible for WSR designation to other waterways in the area that were found not eligible. There must be a resource demonstrating outstanding remarkable values above and beyond those of other rivers in the region. Something unique must be present in the waterway, and this needs to be fully disclosed and described to support an eligibility finding.”	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
“Pages 8-10. “Table 1. Summary Of River Segment Eligibility And Tentative Classification” lists whether the river is located partially within an ACEC, which is unrelated to river segment eligibility under WSR classification. The inclusion of ACEC status within this table is confusing, and such references should be removed.”	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
“Page 11, “Figure 1. WSR Eligibility Status of all 22 Waterways Analyzed by the BLM.” The 22 eligible rivers should be labeled on the map.”	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
“2.2.2 Anvik River, page 13. The state file on the Anvik River indicates that the state considers this river to be navigable.”	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
“2.2.3 Big River, page 14. Tributary to the Kuskokwim main stem. BLM records show the Big River is navigable 38 miles, while state records indicate the river to be navigable upstream to approximately river mile 137. The description mentions that the Big River is a salmon spawning stream and a foraging area for brown bears, but makes no mention of sheefish, despite BLM’s proposal to designate 700,000 acres for an ACEC because of the Big River’s sheefish spawning habitat. The description also incorrectly describes the Big River mouth as reaching the Pacific Ocean; the Big River flows into the Kuskokwim River, not the Pacific Ocean directly.”	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)

Comment	Source
<p>“2.2.4 Black Water Creek. Tributary to the Middle Fork of the Kuskokwim; confluence with MF in Section 11. T. 33 N., R. 30 W., SM. In an August 11, 1981 determination the Black Water Creek was determined navigable upstream to NE¼SE¼ Section 32, T. 33 N. R. 30 W. SM.”</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“2.2.7 Kuskokwim River, page 15. The entire length of the main stem of the Kuskokwim River is navigable from its mouth upstream to Medfra where it splits into the North, East, and South Forks and the State of Alaska has a RDI on file for the main stem of the river, with the North, East and South Forks of the Kuskokwim also navigable.</p> <p>The Kuskokwim River has been determined navigable and the BLM only manages 0.4 percent of the total uplands. We request that BLM take a hard look to determine if the outstanding remarkable fish resource value occurs on BLM lands in sufficient quantity to qualify as an ORV.</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“2.2.9 Middle Fork of the Kuskokwim River, page 16. Determined by the BLM to be navigable up to the mouth of the Pitka Fork in Section 22, T. 33 N., R. 29 W., SM. based on “Alaska’s Kuskokwim Region a History” (1985). In an August 11, 1981 determination the Middle Fork was determined navigable upstream to its “Juncture with the Windy Fork”.</p> <p>However the Iditarod National Historic Trail is not within the boundary of the Middle Fork Kuskokwim River where BLM manages the uplands, and the historic trail is not directly related to this river, nor does it owe its location or existence to the presence of the Middle Fork Kuskokwim River. We request the historic ORV be removed for the Middle Fork of the Kuskokwim River.”</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“2.2.10 North Fork Unalakleet River. Currently designated WSRC. Administratively determined navigable within the WSRC from its confluence with the Unalakleet River upstream to the northern boundary of Section 26, T. 17 N., R. 7 W., KRM.”</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)
<p>“2.2.11 Otter Creek (Aniak). The Tuluksak River is navigable upstream of the confluence with Otter Creek but there is no navigability data for Otter Creek.”</p>	Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)

Comment	Source
<p>“2.2.13 Pitka Fork, page17. Tributary to the Middle Fork , navigable from the confluence with the Middle Fork upstream to S032N028W06; may be navigable further upstream to S031N028W14 but BLM records just go to S032N028W06.”</p>	<p>Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)</p>
<p>“2.2.14 Salmon River (Nikolai), page 17. A Tributary to Pitka Fork, confluence in S032N028W05; BLM data show a short segment, approximately 3.5 miles, of the Salmon River is navigable from confluence with Pitka Fork up to the forks in S032N028W03.”</p>	<p>Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)</p>
<p>“2.2.18 Tatlawiksuk River, page 18. In an August 25, 1982 Final Easements for The Kuskokwim Corporation the Tatlawiksuk River was determined to be both a major waterway and Navigable. On August 18, 1988 the BLM determined the lower reaches within T. 21 N., R. 38 W., SM. navigable.”</p>	<p>Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)</p>
<p>“2.2.20 Unalakleet River, page 18. State records indicate the Unalakleet River is navigable up to the confluence with Tenmile Creek in K016S005W22. We question the inclusion of the Unalakleet River in this eligibility study since it is already been identified by Congress under Section 5(a) of the Wild and Scenic Rivers Act as a designated wild river. The eligibility study contained in this report is the first step in the evaluation of rivers for possible inclusion in the National System and should not be applied to designated rivers.”</p>	<p>Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)</p>
<p>“2.2.21 Yellow River, page 20. Tributary to the Anvik River; confluence in S033N060W28. There are no navigability records in SDMS, however, there is a Native Allotment (NA) on the river in S034N059W32. The records indicate the NA has been surveyed. The case file number is AKFF 013797. A NA on a river is a good indication that the water body may be navigable because the allottees usually use boats for access to their allotment.”</p>	<p>Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)</p>
<p>“2.2.22 Yukon River, page 21. The Yukon River is navigable from its mouth to the Alaska/Canada border. We question the inclusion of the Yukon River in this report, as it is a heavily used international river.”</p>	<p>Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 5/29/15 (during Preliminary Alternatives)</p>

Comment	Source
<p>“Many large tracts of lands that were conveyed to Doyon from the United States under ANCSA are now surrounded by CSUs. As a result of this planning process, even more Doyon lands could be surrounded by or adjacent to river segments proposed for Wild and Scenic Rivers Act (“WSRN”) designation, lands proposed to be maintained for wilderness characteristics, or Areas of Critical Environmental Concern (“ACECs”). As a result of the location of Doyon’s lands and the location of resource exploration and development activity on those lands, Doyon anticipates that it ultimately will need to obtain access across certain CSUs in Alaska pursuant to Title XI of ANILCA and, more so in the case of the BSWI Planning Area, across other federal, BLM-managed lands pursuant to ANILCA Section 1323(b). Further enveloping Doyon’s lands within Wild and Scenic Rivers, lands to be maintained for wilderness characteristics, and/or ACECs would further complicate access to and use of Doyon lands, and potentially prevent Doyon from fully realizing the economic and other benefits that Congress intended it would enjoy as a result of ANCSA’s settlement of aboriginal land claims.</p>	Written comment submission, Doyon Limited, Fairbanks, 5/28/15 (during Preliminary Alternatives)
<p>“Doyon generally opposes recommending additional river segments for inclusion in the National Wild and Scenic Rivers (“NWSR”) System. NWSR recommendation and designation imposes significant restrictions on the use of, and access to, surrounding lands. Recommendation and designation of additional river segments reviewed in connection with this planning effort could prevent Doyon from reasonably accessing its lands and enjoying the full economic benefit of those lands as intended by ANCSA.”</p>	Written comment submission, Doyon Limited, Fairbanks, 5/28/15 (during Preliminary Alternatives)
<p>“Yukon River In its WSR Eligibility Report, BLM explains that the Yukon River has been found eligible and was assigned a tentative classification of wild. The relevant factors that BLM has identified for consideration as part of a suitability evaluation do not support a suitability determination for the Yukon River. Accordingly, Doyon strongly urges BLM to determine the Yukon River nonsuitable for designation under the WSRA.”</p>	Written comment submission, Doyon Limited, Fairbanks, 5/28/15 (during Preliminary Alternatives)
<p>“Yukon River [BLM Manual, 6400- Wild and Scenic Rivers -Policy and Program Direction for Identification, Evaluation, Planning, and Management (Public), pp. 3-4 (BLM July 12, 2012).] These considerations should weigh heavily against any finding that the Yukon River may be suitable for designation under the WSRA.”</p>	Written comment submission, Doyon Limited, Fairbanks, 5/28/15 (during Preliminary Alternatives)
<p>“Yukon River In addition, designation of the Yukon River as a Wild & Scenic River would adversely impact historical and important uses of the river. As the WSR Eligibility Report states, “[t]he Yukon River is</p>	Written comment submission, Doyon Limited, Fairbanks, 5/28/15 (during Preliminary Alternatives)

Comment	Source
a major watercourse of northwestern North America." Id., pp. 10, 21. As the Report states, "[t]he villages along the Yukon have historically and continue to rely on salmon for their cultural, subsistence, and commercial needs." Id., pp. 10, 21. However, these small, isolated communities have historically relied on and continue to rely on the Yukon River for far more than that."	
<p>"Kuskokwim River</p> <p>Consideration of the relevant questions and factors similarly fails to support a determination of suitability for the Kuskokwim River. Accordingly, Doyon strongly urges BLM to determine the Kuskokwim River nonsuitable for designation under the WSRA."</p>	Written comment submission, Doyon Limited, Fairbanks, 5/28/15 (during Preliminary Alternatives)
<p>"Kuskokwim River</p> <p>Further, designation of the Kuskokwim River as a Wild & Scenic River would adversely impact historical and important uses of the river. As stated in the WSR Eligibility Report, the Kuskokwim River, today, provides a "useful" and "viable transportation route for many types of watercraft, as well as road vehicles during the winter when it is frozen over." WSR Eligibility Report, pp. 8, 15. Like the Yukon River, the Kuskokwim River serves not only as an important source of subsistence resources, but also as a critically important transportation route for remote, isolated communities along the river. As noted above, the road and rail system in Alaska is extremely limited, and this is particularly the case in western Alaska. BLM has determined the entire length of the Kuskokwim River to be navigable from its mouth to the confluence of its North and South Forks. Jack Frost to AA-086371, p. 6. Indeed, BLM has stated that "[t]he navigability of the Kuskokwim River is not in question due to the wealth of information available about use of the river for commerce and the travels of its many users throughout its history." Id. That history of the river's use as a highway for travel and transportation is summarized in a 2013 BLM memorandum summarizing the federal interest in lands underlying the river."</p>	Written comment submission, Doyon Limited, Fairbanks, 5/28/15 (during Preliminary Alternatives)
<p>"The WSRA requires agencies to address potential wild and scenic rivers in all planning efforts. Even if the BLM Specialist, therefore, correctly concluded that river certain river segments did not meet the statutory criteria, by leaving ORV columns blank in Table 3, the public is not provided the opportunity to review, as contemplated by WSRA, the criteria used by the specialist in making these determinations."</p>	Written comment submission, The Center for Water Advocacy, Fritz Creek, 5/31/15 (during Preliminary Alternatives)

Comment	Source
<p>“City of Nikolai Resolution 2015-01B. A Resolutions Stating why the Citizens of Nikolai Subsistence Future will be Threatened if the BLM Establishes Salmon River, Big River, Pitka Fork Et. Al. as Wild & Scenic Rivers and 1,100 Square Mile Sheefish ACEC in the area immediately south of Nikolai...Whereas: Several Nikola Citizens own native Allotments, Hunt and Fish Camps on several drainages that are proposed to become Wild and Scenic Rivers...Whereas: A Wild and Scenic Rivers classification on the Rivers may cause them to be run over by People and Destroy the King Salmon”</p>	<p>Written comment submission, Nikolai City Council Resolution, Nikolai, 5/29/15 (during Preliminary Alternatives)</p>
<p>“The State maintains its long held opposition to Wild and Scenic River (WSR) Studies in Alaska. ANILCA added twenty-six rivers in Alaska to the Wild and Scenic River System and mandated twelve additional rivers be studied for potential designation. The reports required in Section 604 for rivers designated for study have long been completed. ANILCA Section 1326(b) states:</p> <p><i>No further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, national conservation area, or for related or similar purpose shall be conducted unless authorized by this Act or further Act of Congress.</i> [Emphasis added]</p>	<p>Written comment submission, State of Alaska Department of Natural resources Office of Project Management and Permitting, Anchorage, 1/17/14 (during Scoping)</p>
<p>Wild and Scenic Rivers are defined by ANILCA as CSUs. Additionally, in response to the settlement agreement for American Rivers vs. Bruce Babbit, BLM policy was modified and includes language which mirrors ANILCA Section 1326(b):</p> <p><i>Pursuant to section 1326(b)...no study shall be conducted for the <u>single</u> purpose of considering eligibility for wild and scenic river designation in Alaska.</i></p> <p>While BLM apparently does not consider studies which are incorporated into resource management plans to be single purpose studies, the purpose of the wild and scenic review for Bering Sea-Western Interior planning area is clearly stated in the Preparation Plan (page 12) as “<i>Rivers that are found suitable for inclusion in the Wild and Scenic River System may be recommended to Congress for designation.</i>” In Alaska, such studies are in direct conflict with ANILCA Section 1326(b).</p> <p>Furthermore, the intent of Congress in ANILCA was not to authorize an endless cycle of studies but to provide finality to the lengthy studies and deliberations that led to the passage of ANILCA. That intent is clearly stated in ANILCA Section 101(d):</p>	

Comment	Source
<p><i>This Act provides sufficient protection for the national interest in the scenic, natural, cultural and environmental values on the public lands in Alaska, and at the same time provides adequate opportunity for satisfaction of the economic and social needs of the State of Alaska and its people; accordingly, the designation and disposition of the public lands in Alaska pursuant to this Act are found to represent a proper balance between the reservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition, and thus Congress believes that the need for future legislation designating new conservation system units, new national conservation areas, or new national recreation areas, has been obviated thereby. [Emphasis added]</i></p> <p>While maintaining the above objection, when considering river suitability, a study must consider the potential land ownership pattern following completion of State and Native land conveyances. Highly fragmented land ownership does not lend itself to Wild and Scenic river corridor management. In addition, the provisions in ANILCA that apply to CSUs would apply to any new rivers designated by Congress, such as allowing motorized access pursuant to Section 1110(a) and (b) and the Title XI Transportation and Utility System (TUS) process. Any interim management prescriptions applied to rivers identified as suitable for recommendation to protect outstandingly remarkable values cannot be more restrictive than the provisions that would apply to congressionally designated Wild and Scenic rivers.”</p>	
“Numerous rural residents reside along the Yukon and Kuskokwim Rivers and in the Delta. These rural residents are heavily dependent for their livelihood on the fish and game resources of the Rivers and their tributaries. The Rivers are vital transportation corridors in remote areas that have few other means of access. Many villages are located on river banks and are vulnerable to erosion. Impacts to the health and function of the Rivers can have potentially widespread effects downstream of any proposed activities. The RMP should address presence, utilization, and potential effects of proposed activities on subsistence resources along the Yukon and Kuskokwim Rivers and Delta.”	Written comment submission, U.S. Fish and Wildlife Service, 1/17/14 (during Scoping)