

# Middle and Upper Kuskokwim Watershed Council

**Applicant:**

Native Village of Georgetown  
5313 Arctic Blvd – 104, Anchorage, AK  
99518-1111  
DUNS: 086132649  
SAM: NEGFGEZRN BK6

**Program Manager:**

Barbara Johnson  
Environmental Coordinator  
Native Village of Georgetown  
5313 Arctic Blvd – 104, Anchorage, AK  
99518-1111  
[Barbara.johnson@georetowntc.com](mailto:Barbara.johnson@georetowntc.com)  
(907) 274 2195 x 26

## Contents

Executive Summary .....	3
Project Location .....	3
Technical Project Description .....	4
Eligibility of Applicant .....	5
Preliminary Goals and Objectives.....	5
Approach.....	7
Evaluation Criteria.....	9
E.1.1. Evaluation Criterion A—Watershed Group Diversity and Geographic Scope .....	9
Description of Stakeholders.....	9
Ensure Stakeholder Diversity .....	11
Stakeholder Support.....	11
Geographic scope.....	13
E.1.2. Evaluation Criterion B—Addressing Critical Watershed Needs.....	14
E.1.3. Evaluation Criterion C—Implementation and Results .....	19
Building on Relevant Federal, State, or Regional Planning Efforts.....	22
E.1.4. Evaluation Criterion D—Presidential and Department of the Interior Priorities .....	23
Combating Climate Change.....	23
.....	25
D.2.2.9. Overlap or Duplication of Effort Statement .....	27
D.2.2.10. Project Budget.....	27
Budget Proposal .....	27
Budget Narrative .....	28
D.2.2.11. Environmental and Cultural Resources Compliance.....	30
D.2.2.12. Required Permits or Approvals .....	31
D.2.2.13. Letters of Support.....	32
D.2.2.14. Official Resolution.....	35
D.2.2.15. Conflict of Interest Disclosure .....	37
D.2.2.16. Single Audit Reporting Statement .....	37
D.2.2.17. Certification Regarding Lobbying .....	38

## Executive Summary

Date: March 31, 2022

Applicant Name: Native Village of Georgetown

Location: Administrative Offices are in Anchorage, Municipality of Anchorage, AK, and the village of Georgetown is in western Alaska, in the Unorganized Borough

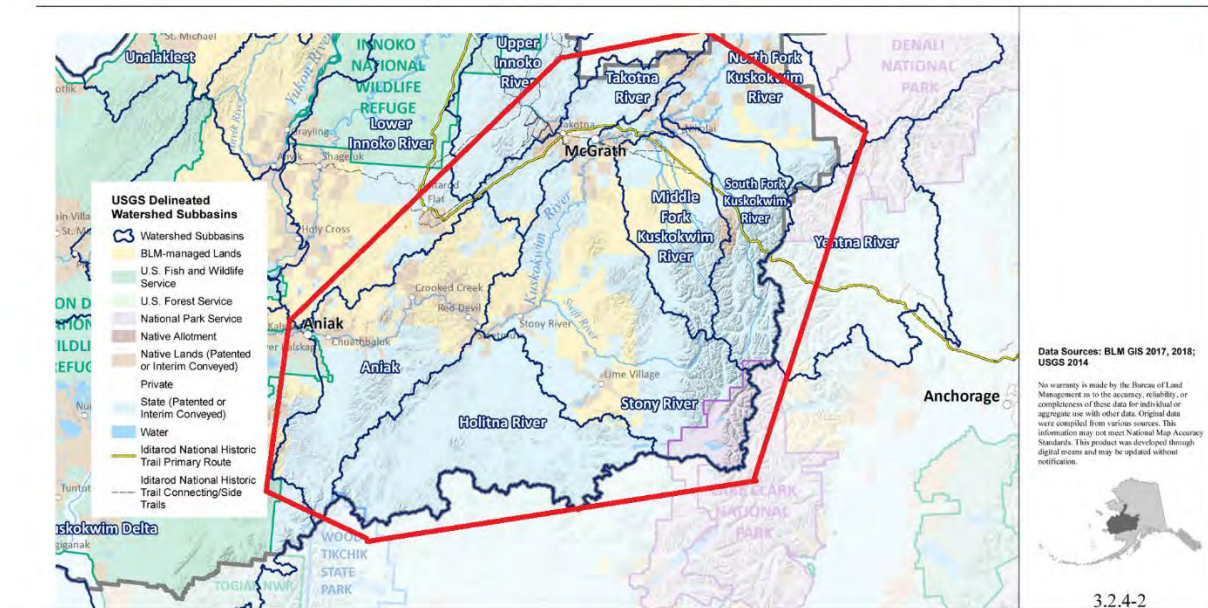
In western Alaska, the Native Village of Georgetown will establish the Middle and Upper Kuskokwim Watershed Council. The Tribe will engage diverse stakeholders, including landowners, the Native Village of Napaimute, The Kuskokwim Corporation, and other affected stakeholders. A changing climate, erosion, wildfires, and declining fisheries are threatening ways of life along the Kuskokwim River. The Kuskokwim River is intrinsic to the communities' ways of life on its shores. It is a source of drinking water, is a highway in this off-road region, and is the habitat of several fish species with significant cultural importance. The Tribe will facilitate the development of the watershed council, including the development of mission and vision statements and the collection of baseline information to identify restoration needs for the watershed.

The development of the Advisory Group is expected to take 24 months and will be completed by September 2024. Lands in the Middle and Upper Kuskokwim Watershed are owned by the Bureau of Land Management, Alaska Native Claims Settlement Act for-profit Corporations, and the State of Alaska.

## Project Location

The Middle and Upper Kuskokwim Watershed is located in western Alaska, in the Unorganized Borough in the Bethel and the Yukon-Koyukuk Census areas, approximately 200 miles west of Anchorage. The Kuskokwim region is off the road system and is only accessible by plane, snowmachine, and boat. The Middle and Upper Watershed Council will cover HUCs 19030401 (North Fork Kuskokwim River), 19030403 (Takotna River), 19030407 (South fork Kuskokwim River), 19030406 (Middle Fork Kuskokwim River), 19030405 (Stony River), 19030404 (Holitna River), 19030501 (Aniak). This area contains 12 rural communities with a population of approximately 1,082. Of these communities, nine communities are in the vicinity of BLM-managed public land within the planning area. These communities range in population from 2 (Georgetown) to 301 (McGrath—the largest population center in the region), with 10 having a 2020 population under 100 and two with a population between 100 and 500. The State of Alaska's primary administrative divisions are referred to as boroughs. The planning area is

within the Unorganized Borough.



**Figure 1** – The watersheds within the red polygon will be included in the Middle and Upper Kuskokwim Watershed Council. Map adapted from the 2020 BLM for the Bering Sea – Western Interior Resource Management Plan.

## Technical Project Description

### Applicant Category

The Native Village of Georgetown is applying as a new watershed group. The new watershed group category is chosen as there is a need for substantial support for building the capacity of the watershed group, including creating its bylaws and mission statement and completing outreach to stakeholders. The Middle and Upper Kuskokwim Watershed Council will build on the now-defunct Kuskokwim River Council (KRC) work, which ceased operations in 2016. The KRC covered the entirety of the Kuskokwim Watershed and only included Tribes. The Middle and Upper Kuskokwim Watershed Council will focus on a smaller section of the watershed and will consist of different groups of stakeholders, including but not limited to Tribes, villages, private landowners, businesses, and government agencies.

A new watershed council is the logical progression of decades of partnerships and collaboration along the Middle and Upper Kuskokwim on watershed planning activities. As local communities and organizations work to assess, manage, and restore the watershed, coordination is needed. Past efforts to create a coalition have waned, requiring communities and organizations to

invest significant time and effort in outreach to share their information, results, and projects. Partnerships and collaborations are developed piecemeal without an umbrella organization, and data is easily siloed. For decades, Tribes, villages, and other researchers have been working on various watershed planning activities. Past activities include:

- Inter-tribal effort to establish the water quality baseline through the region's EPA General Assistance Program (GAP);
- Identification of sources of pollution originating from abandoned mines. Of note is BLM and EPA's work on identifying pollution at Red Devil Mine, an abandoned mercury mine
- Educational and outreach efforts by Tribes and federal agencies regarding pollution, water quality, and safety of subsistence foods;
- Erosion and flood monitoring control and mitigation in communities.

### Eligibility of Applicant

The Native Village of Georgetown will facilitate the development of the watershed group and will coordinate activities and meetings. The Native Village of Georgetown will also be a member of the watershed group. The Native Village of Georgetown will act as a boundary spanner. Thanks to its existing programs, the Native Village of Georgetown already has contacts with diverse groups of stakeholders. The Native Village of Georgetown has taken a neutral stance concerning mining, placing it uniquely to facilitate conversations between watershed stakeholders.

The Native Village of Georgetown meets the eligibility criteria to be an applicant. The Native Village of Georgetown is a federally recognized Tribe located in Alaska. The Native Village of Georgetown is also significantly affected by the quality and quantity of water in the Kuskokwim Watershed. The Native Village of Georgetown depends on the Kuskokwim Watershed to engage in subsistence, including fishing. The Kuskokwim River is also a transportation corridor connecting communities in the region. Barges carrying fuel and other items must travel on the Kuskokwim to reach Georgetown. The Native Village of Georgetown can promote the sustainable use of water resources. The Native Village of Georgetown Environmental Department has focused on establishing the water quality baseline for the Kuskokwim River for over a decade. It has been involved in partnerships to manage the watershed sustainably. The Native Village of Georgetown has a quarterly environmental newsletter and a dedicated environmental website to promote environmental best practices.

### Preliminary Goals and Objectives

The development of the Council directly meets the goals of the R22AS00163 – WaterSMART Cooperative Watershed Management Program Phase I, which aims to promote water reliability and cooperation between stakeholders to reduce conflict, facilitate solutions to complex water issues, and stretch limited water supplies.

Our long-term goal is to develop a Middle and Upper Kuskokwim Watershed Council ("the Council") that facilitates projects planning, development, and implementation to maintain and restore the Kuskokwim Watershed by increasing stakeholder cooperation. Watershed councils have proven to be highly effective in managing and protecting watersheds. Unfortunately, the closure of the Kuskokwim Watershed Council in 2017 created a void that has left individual stakeholders to coordinate activities. Following Western principles of environmental management, the Middle and Upper Kuskokwim Watershed Council covers only two eco-regions in the watershed: the Kilbuck-Kuskokwim mountain Tanana-Kuskokwim Lowlands eco-regions. According to the 2013 EPA publication "Engaging Stakeholders in Your Watershed," this will help ensure that interests are similar. Again, as per EPA guidelines, the scale was chosen using a common-sense analysis of the watershed's people, issues, and activities.

To accomplish our main objective above, we propose the following preliminary goals:

1. Development of a watershed group. The Native Village of Georgetown will facilitate the creation of a Middle and Upper Kuskokwim Watershed Council by 2024. The Native Village of Georgetown will accomplish this by organizing bi-monthly meetings with a diverse array of stakeholders.
2. Sustainable group development. By the end of the grant, the Council will have developed a mission and vision statement, bylaws, and long-term goals to govern the Council's future work and operations. Participants will have met multiple times in-person and virtual meetings, helping develop
3. Watershed group diversity. Within the first six months of the grant, participants will complete a stakeholder analysis to identify stakeholder groups and points of contact in each group. The Native Village of Georgetown will then reach out to the identified point of contact and invite them to join the watershed development group or suggest someone else.
4. Representation across the watershed. The Council will review every six months which region participants represent. Outreach efforts will then focus on areas with little to no representation at watershed group development meetings.
5. Youth Participation. The Upper and Middle Kuskokwim Watershed Council will prioritize youth participation in the watershed. Youth participation will be facilitated through an internship where the youth will participate in the watershed group development. The Native Village of Georgetown will also encourage the group to create a Youth position on the Council.
6. Development of a stakeholder outreach strategy. The Native Village of Georgetown will facilitate the outreach activities by creating a website to share information and group developments news and regularly creating outreach material such as newsletters, flyers, and pamphlets to be shared with stakeholders.

7. Conduct pre-planning activities. The Native Village of Georgetown will conduct pre-planning activities by identifying and reviewing existing watershed plans and baseline water quality data. In addition, the Native Village of Georgetown will regularly update the Council website throughout the grant to share the information collected.
8. Apply for additional funding. The Native Village of Georgetown will apply for funding to continue the operations of the watershed group after the Bureau of Reclamation grant is completed.

## Approach

The watershed group will be developed by addressing Task A: Watershed Group Development projects. Healthy watersheds depend on healthy and robust organizations. Seeing to administrative needs, such as writing bylaws, is vital to starting an organization and will set the ripple effect for building a solid foundation. Watershed group developed through stakeholder involvement result in stronger working relationships and enhanced communication and coordination of resources. This helps ensure that any concerns, including environmental justice, are identified early. A comprehensive approach to resource management takes time to develop and needs to understand stakeholders' interests and fears and have a process that is appropriate to the time and place. With these considerations in mind, the watershed group will:

- Recruit Stakeholders. Local stakeholders, especially residents, often know more of what is going on in the watershed than agencies, particularly in the Kuskokwim, a remote region with little systematic monitoring of environmental parameters. Involving stakeholders builds trust and support for the process and outcome. In addition, stakeholders share responsibility for decisions and actions, resulting in solutions more likely to be adopted, leading to better and more cost-effective solutions. The Native Village of Georgetown, the Native Village of Napaimute, and The Kuskokwim Corporation will recruit stakeholders to participate in the first meeting through their contacts and partnerships. They will conduct a stakeholder analysis to identify stakeholder groups and ensure that the group encompasses diverse stakeholders and covers the geographic scope of the watershed. Participants will review the stakeholder analysis during the first in-person meeting and add to it. After the first meeting, newly identified stakeholder groups will be invited to attend group development activities. Keeping in mind that an optimum number of participants is likely to be around 10-15, participants will also discuss how to ensure representation.  
Note: stakeholders who participate in group development activities will be called participants throughout this application.
- Develop a mission, vision, goals, and bylaws. The mission, vision, goals, and bylaws of the group will depend on the issues and needs of stakeholders. During the first meeting, participants will identify issues and needs in the watershed and rank those

issues with the assistance of a facilitator. During the project's first year, issues and ranking will be reviewed regularly as new participants join the group. After, the Council will review the issues and ranking annually. Once there is a consensus on the most pressing issues, participants will start working on the vision, mission statement, and short and long-term goals. The Council will finalize these during their second in-person meeting. Participants will write the bylaws in the second year of the project. Participants will also decide on membership and how to ensure proper representation from stakeholder groups while ensuring the Council group is not too large.

- Develop partnerships. The underlying philosophy behind the formation of the watershed group thinks in horizontal terms rather than a hierarchical structure. To successfully navigate the complex challenges facing the Kuskokwim, we must leverage the existing network of stakeholders. Therefore, the focus of the group development activities will be on communication and collaboration through a flexible arrangement. Ultimately, the group development must enhance and incentivize partnership development to ensure the long-term viability of the Council. Given the diversity of the stakeholders, it is likely that there will be contrasting needs, priorities, and goals. Allocating a year to develop the mission and vision statement and identifying issues will allow time for discussion, compromise, and consensus-building. The consensus process and partnerships have a positive impact on serious watershed problems. And participants will continue to be active in the Council. Furthermore, the group development activities will be an opportunity to bring together different stakeholders who rarely work together.
- Conduct outreach activities. Throughout the project, the Native Village of Georgetown will conduct outreach activities. For example, at the beginning of the project, the Native Village of Georgetown and the other participants will develop an outreach plan which will include handouts, a website, a newsletter, advertising stakeholder meetings, publicizing issues, and promoting the best watershed management practices and presenting the results of the group development activities at Alaska based conferences such as the Alaska Tribal Conference on Environmental Management and the Alaska Forum on the Environment.
- Perform pre-planning activities. The Native Village of Georgetown and other group participants will identify and research existing watershed management plans and data concerning the Middle and Upper Kuskokwim Watershed. The information collected will be shared during meetings and on the website of the watershed group. The Native Village of Georgetown and other participants will also analyze and synthesize the collected information.

The Middle and Upper Kuskokwim is a remote region in western Alaska. There are no roads, and travel to and between communities is via plane, snowmachine in the winter, or boat in the summer. Travel is also highly dependent on weather. In addition, broadband access is erratic and dependent on weather and outages. As such, communication and partnership building



requires time and intentionality. Being able to dedicate two years to building a new watershed council through collaboration with a diverse group of stakeholders will likely result in stronger institutional foundations, more buy-in, and the long-term sustainability of the Council. Time is also an investment to build trust among stakeholders and partnerships. This can increase the number of opportunities available to the Council and allows to align more assets in support of the strategic mission of the Council.

All of the communities in the region are disadvantaged communities. Most communities have high and persistent poverty rates, high unemployment and underemployment, high housing cost burden, high transportation cost burden, limited water and sanitation access and affordability, high energy cost burden. Therefore, to fulfill the goal of direct involvement in the environmental justice community, it is necessary to engage these communities directly. Several environmental justice issues in the watershed include:

- Localized groundwater and land contamination from past mining operations;
- Water utilities lack the resources to upgrade their infrastructure and provide up to date treatment technologies;
- The Native Village of Georgetown and the Native Village of Napaimute are rebuilding their villages. Tribal members return seasonally to the villages to engage in subsistence, but only two people live year-round in each community.

## Evaluation Criteria

### **E.1.1. Evaluation Criterion A—Watershed Group Diversity and Geographic Scope**

#### Description of Stakeholders.

The Native Village of Georgetown has identified the following group of stakeholders. At the start of the project, the Native Village of Georgetown, the Native Village of Napaimute, and The Kuskokwim Corporation will complete a stakeholder analysis and present it to the other group participants for review at the first in-person meeting. The following stakeholder categories are not present in the Middle and Upper Kuskokwim Watershed: hydroelectric producers, livestock grazing, irrigated agriculture. All stakeholders depend on the Kuskokwim River to travel and receive supplies. Many also depend on the river for food, to conduct culturally essential activities, as a drinking water source. Finally, erosion and flooding impact users and owners of buildings and infrastructure in the watershed. The Stakeholders of the Middle and Upper Kuskokwim include, but are not limited to:

- Subsistence Users: The Middle and Upper Kuskokwim residents frequently engage in subsistence, continuing their traditional way of life. The river is a source of subsistence foods, and a means to travel to subsistence grounds.

- Youth: the youth in region depend on a healthy watershed for their future.
- Kuskokwim River Ice Road: In the winter, the Native Village of Napaimute and other Tribal transportation departments and the State of Alaska maintain an ice road on the Kuskokwim River. The ice road provides an affordable transportation method between communities.
- Communities (villages): The proposed Council would encompass twelve communities: Chuathbaluk, Napaimute, Crooked Creek, Georgetown, Red Devil, Sleetmute, Lime Village, Stony River, Takotna, Nikolai, McGrath, and Telida. These communities depend on the river for travel, water, and food. Residents typically refer to their communities as "villages."
- Municipal government: The City of McGrath is the only municipal government within the watershed area.
- Tribes: Each community has a federally recognized Tribe and tribal government. The Tribes are Native Village of Chuathbaluk, Native Village of Napaimute, Village of Crooked Creek, Native Village of Georgetown, Village of Red Devil, Village of Sleetmute, Lime Village, Village of Stony River, Takotna Village, Nikolai Village, McGrath Native Village, and Telida Village.
- ANCSA For-Profit Corporations: The Alaska Native Claims Settlement Act (ANCSA) resulted in the creation of regional and village for-profit corporations, which are landowners. Calista and Doyon, two regional ANCSA corporations, own the subsurface rights in the watershed. Two village corporations, The Kuskokwim Corporation and MTNT Ltd, own the surface rights.
- Mines: There are numerous operating artisanal mines within the watershed. A proposed large-scale mine, Donlin Gold, near Crooked Creek, has started building infrastructure in the watershed but is not yet operating.
- Businesses: Businesses such as lodges, community stores, barge operators, guides, timber producers are stakeholders. These businesses depend on the river to travel and get supplies. The watershed is intrinsic to the appeal of the lodges to their customers.
- School District: The watershed includes the Iditarod Area School District and the Kuspuk School District. Both school districts use the river to travel and own property along the river shores threatened by flooding and erosion. Some schools also use the river as a water source.
- Federal and State Agencies: BLM owns some of the lands in the watershed. Additionally, BLM is responsible for remediating the contamination at the site of Red Devil Mine. The Alaska Department of Fish and Game has several fishing weirs in the watershed. The U.S. Fish and Wildlife Service manages the Yukon-Delta Refuge in the lower section of the Kuskokwim. The Federal Aviation Administration maintains several airport landing strips and meteorological equipment throughout the watershed. The USGS operates gauging stations and conducts research throughout the Kuskokwim.

- Utilities: The Middle Kuskokwim Electric Cooperative (MKEC) is the electric utility for most communities. MKEC is dependent on the river for travel to the communities. Some of the MKEC infrastructure is threatened by flooding and erosion. The McGrath Water Utility is another stakeholder. The remaining communities do not have a centralized piped water distribution system and depend on wells or haul their water.
- Non-profits: The Kuskokwim River Intertribal Fisheries Commission represents subsistence users across Kuskokwim, including the middle and upper sections of the watershed. Excel Alaska is an educational non-profit that coordinates natural resource management field internships throughout the watershed.

#### Ensure Stakeholder Diversity

It is important that the watershed group include a diverse array of stakeholders to ensure meaningful and impactful decision-making and group development. At the beginning of the project the Native Village of Georgetown, Native Village of Napaimute and The Kuskokwim Corporation will perform a stakeholder analysis to identify stakeholder groups. They will then invite at least one representative from each group to participate in group development activities. At the first meeting, all participants will review the stakeholder groups identified. Additional stakeholders may be invited after the meeting. Since the watershed has less than 1,100 year-round and seasonal residents, personal connections are the best way to invite people to participate. Each of the three supporting organizations takes on many roles in the watershed, creating a solid and long-term network that will be used to reach out to stakeholders and ensure stakeholder group diversity.

#### Stakeholder Support

Below is a description of the affected stakeholders within the watershed that support the formation of a watershed group:

- Native Village of Georgetown (applicant): Georgetown is located on the Kuskokwim River, in the Kilbuck-Kuskokwim Mountains, at its convergence with the George River. Georgetown Tribal Council (GTC) is the governing body for the federally recognized Tribe of the Native Village of Georgetown, Alaska. Under the Alaska Native Claims Settlement Act (ANCSA) of 1971, 38 individuals enrolled, securing GTC's status as a federally recognized tribe. GTC has since enrolled children of original descendants, which brings current tribal membership to about 150. Though the enrollees are scattered for economic reasons, they retain a strong connection to their land and desire to repopulate Georgetown. As mining declined, members were forced to leave Georgetown due to a lack of employment opportunities. Many of our members still live in the area, in other nearby Kuskokwim River villages or in Bethel. It wasn't until the passage of ANCSA and the opportunity to take ownership of ancestral lands that former Georgetown residents and their descendants had an opportunity to plan to move back home. The mission of the Native Village of Georgetown is to protect the health of the Kuskokwim and George Rivers and rebuild the village. The Tribe prides itself in the

timely submission of all narrative and financial reports required by funding agencies. The Native Village of Georgetown only applies for and administrates programs the Tribe can manage. In keeping with this philosophy, quarterly, annual, and biennial reports are submitted promptly to State, Federal, and private grant funders.

**Stakeholder groups: Tribe, Community, Subsistence Users**

- Native Village of Napaimute (Provided Letter of Support): The Native Village of Napaimute is a federally recognized Tribe. The goal of the Native Village of Napaimute is to promote job growth, create sustainable employment opportunities within the region, and develop a locally based industry and help provide affordable, energy efficient housing. The Native Village of Napaimute has for many years contributed significantly to fisheries-related partnerships and outreach efforts throughout the Kuskokwim Region. Dan Gillikin is the current Environmental Director for the Native Village of Napaimute and has had an extensive career as a Fisheries Biologist working with multiple organizations and for several federal agencies for over 25 years, including the Yukon Delta National Wildlife Refuge as the Refuges Fisheries Biologist for 6 years.

**Stakeholder groups: Tribe, Community, Subsistence Users, Business (Timber Producer, Sawmill Operator, Barge, Lodge)**

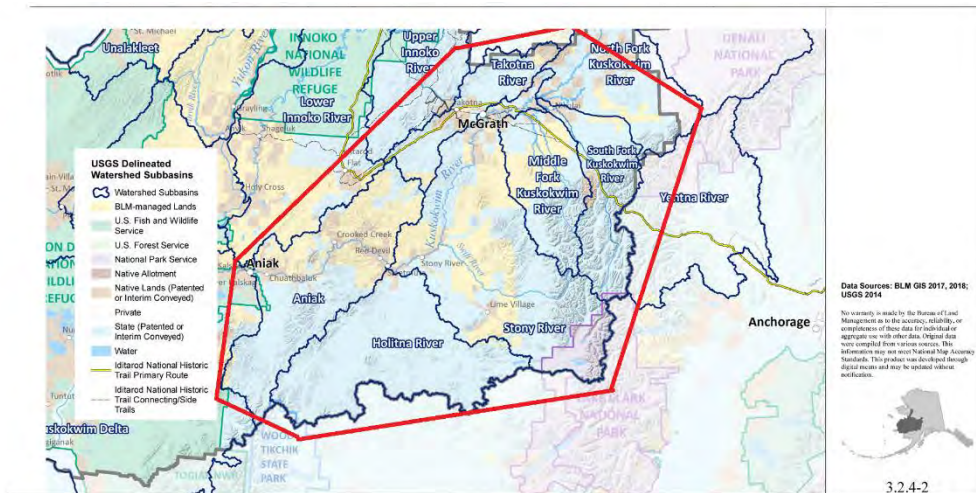
- The Kuskokwim Corporation (Provided Letter of Support): TKC is a for-profit Alaska Native Corporation governed by ANCSA, which continues to support our culture and tradition through scholarships, donations, and other activities. The surface area estate, to which TKC has the title, lies along the Kuskokwim River and its tributaries, from about 20 miles below Lower Kalskag to 20 miles above Stony River. Combined, TKC owns more than 950,000 acres of surface estate in the middle Kuskokwim region. TKC carefully pursues new opportunities that benefit all Shareholders. A board of 12 directors is committed to responsibly establishing the development of TKC's land, business ventures, resources, and diversification strategies to best benefit Shareholders. All decisions made by the Board of Directors are strategically made by considering and applying TKC's defined purpose, commitment, and vision. The peoples' connection to the land helps define who we are, as our Shareholders practice hunting and trapping, gathering, arts and crafts in their daily lives. TKC is deeply respectful of the historical lands in the region as Shareholders practice subsistence activities that depend on animal migratory patterns and hunting seasons. In the middle Kuskokwim region, animals and fish are woven into the subsistence way of life. TKC is rich in culture and comprises more than 4,000 shareholders. TKC carefully pursues new opportunities that benefit Shareholders in its villages and across the United States. Shareholders have unlimited access to TKC land for all traditional activities. TKC provides campsites to Shareholders and their families under the permit program to provide year-round access to our lands for traditional fish camps and other subsistence activities. TKC utilizes indigenous knowledge as a decision-making tool, as well as recognized best practices. TKC values its land and resources and strives to be good stewards to provide for its future generations.

**Stakeholder groups: Land Owner, Business (Timber, Store), owner of land used by Donlin Gold**

In addition, other Tribal stakeholders have expressed interest in the formation of the Middle and Upper Kuskokwim Watershed Council. Only some of the interested stakeholders were able to provide letters of support due to the timing of their Council meetings. Several Tribes have expressed interest in participating and establishing the Watershed Council to facilitate collaboration across the watershed and share information.

Geographic scope.

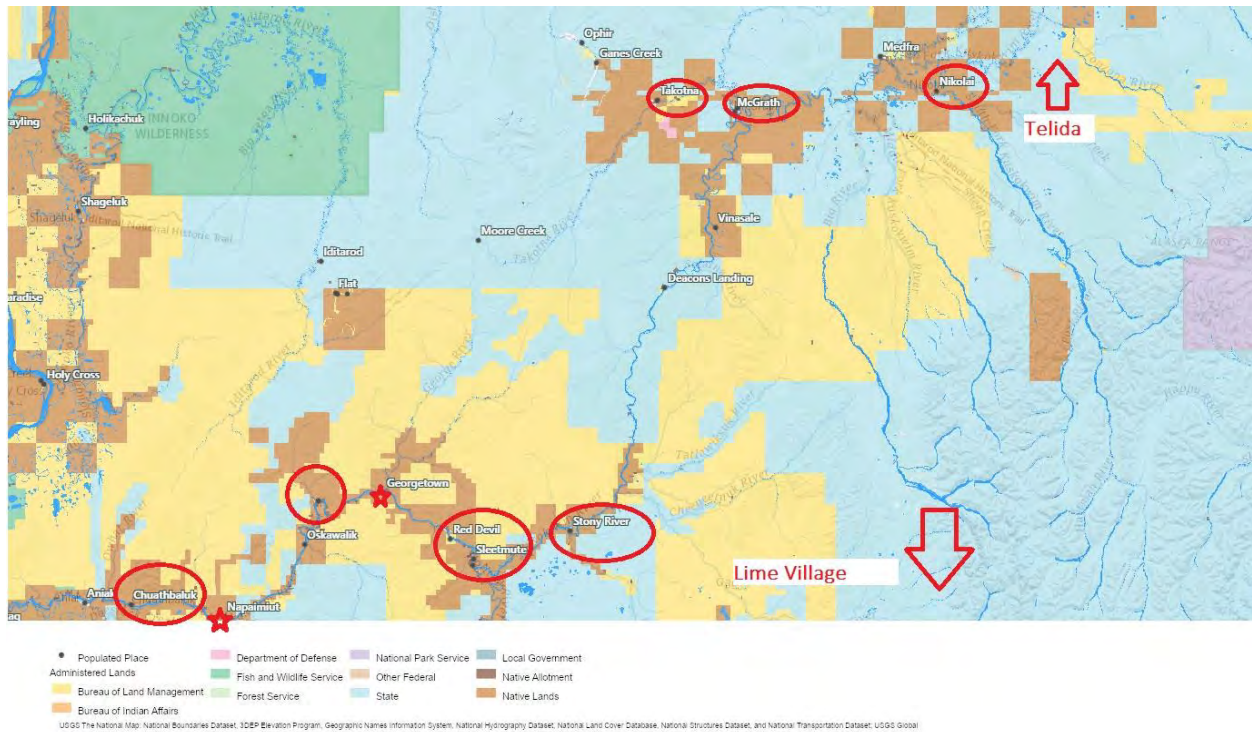
The Middle and Upper Watershed Council will cover HUCs 19030401 (North Fork Kuskokwim River), 19030403 (Takotna River), 19030407 (South fork Kuskokwim River), 19030406 (Middle Fork Kuskokwim River), 19030405 (Stony River), 19030404 (Holitna River), 19030501 (Aniak) (Figure 2). The entire area has less than 1,100 year-round and seasonal residents and so it is necessary to include several HUCs to ensure capacity to participate in group development activities.



**Figure 2** – The watersheds within the red polygon will be included in the Middle and Upper Kuskokwim Watershed Council. Map adapted from the 2020 BLM for the Bering Sea – Western Interior Resource Management Plan.

The communities in the watershed are identified in Figure 3. The red stars indicate the location of the two communities currently involved in the group: Napaimute and Georgetown. These two communities are in the Middle Kuskokwim. The Kuskokwim Corporation (TKC) and MTNT own the brown land near the communities. TKC is currently involved in the group, and owns the land in the Middle Kuskokwim. The red ovals indicate the location of populated communities and Tribes. Artisanal mines are distributed across the Middle and Upper Kuskokwim. Donlin Gold mine will be situated between Napaimute and Georgetown, just a few miles from Crooked Creek. Outreach efforts will focus on inviting stakeholders from the Upper Kuskokwim to ensure

geographic representation.



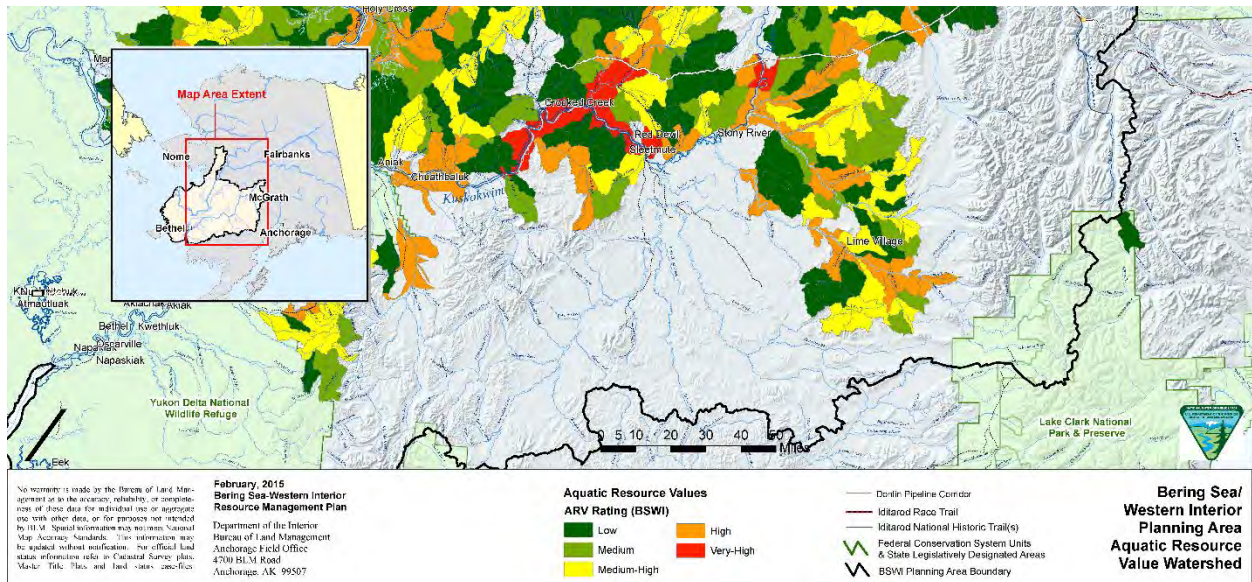
**Figure 3** - Map showing location of communities in the watershed. Map adapted from the 2020 BLM for the Bering Sea – Western Interior Resource Management Plan.

### E.1.2. Evaluation Criterion B—Addressing Critical Watershed Needs

High-Value Watershed. The Middle and Upper Kuskokwim contains several very high and high-value watershed areas as determined by the BLM (Figure 4). To identify the highest resource value aquatic habitats BLM developed a priority ranking system using a combination of automated GIS modeling and professional judgment. Priority ranking was based on a variety of factors using an Aquatic Resource Values (ARV) model. The primary aquatic factors considered in the model were: priority fish species presence, diversity of species, habitat conditions, and productivity. The ARV scores were then grouped into four distinct classes with similar scores described as: Low, Medium, Medium-High, or High. High value watersheds have been determined to contain the highest fisheries and riparian resource values.

Water Quality. Water quality in most of the lakes and rivers is in a natural state, and existing impairments are due to natural conditions. Turbidity levels are naturally elevated in most Alaska streams, regardless of land use, during high-flow events. According to Alaska's Final 2012 Integrated Water Quality Monitoring and Assessment Report , segments of Red Devil Creek and

Kuskokwim River are on Alaska's list of impaired water bodies (i.e., Clean Water Act Section 303(d) list). Both are in the Kuskokwim watershed near the Red Devil mine site and exceed water quality standards for antimony, arsenic, and mercury. Other impaired waterbodies may exist in the planning area that is not currently 303(d) listed. A search of the Alaska Department of Environmental Conservation Contaminated Sites Database indicates two active contaminated sites on BLM-managed lands in the planning area: Red Devil Mine and Kolmakof Mine.



**Figure 4-** High Value Watersheds as identified by the BLM framework. Map adapted from the 2020 BLM for the Bering Sea – Western Interior Resource Management Plan.

Permafrost Thawing and Erosion. Permafrost In the Middle Kuskokwim region, communities along the river have documented the increase of arsenic, antimony, and mercury in the river water as the permafrost thaws and the river banks. In some communities, such as Stony River, the eroding coast is coming closer to homes and other community infrastructure. Stony River residents are adapting to the erosion by using brush, shrub, and other vegetation to reduce soil exposure, educating community members about how cutting trees affects erosion, and continually monitoring river bank reduction and water levels. Since 2005, the City of McGrath and The Native Village of McGrath have collaborated on on erosion and flood control measures. Through their collaboration, they have started annually, hinders emergency access, and threatens the community's fuel tank farm, electric powerhouse and water plant. Flooding threatens the environmental and public health, damages to infrastructure and private property, and recovery and repairs are really expensive.

Away from the river, permafrost is changing the landscape in other ways. Permafrost freeze and thaw causes the ground to heave. In some areas, this can shift houses, and damage roads.

Road repair is expensive, but can also lead to vehicle damage or interruptions in road access if not addressed.

Environmental Justice. A 2015 epidemiological study of Alaska Native Yup'ik pregnant women documented higher mercury levels in blood than is typically measured in America, and reflects the fish and marine mammal intake of the population, rather than point-source contamination from an industry source. To date, the Alaska Department of Health and Social Services (DHSS) have not found any cases of unsafe mercury exposures that are the result of consuming Alaska fish. However, measurements of mercury levels found in pike and burbot (luch) from the Middle Kuskokwim were used by DHSS to create region-specific consumption guidelines.

Fishing. Concerns about the health of fish are related to concerns about water quality. Warmer waters stress the fish and allow more parasites and diseases to thrive, and residents say that more salmon are caught with internal worms and physical abnormalities such as small bumps and growths. Warmer water also leads to low levels of dissolved oxygen, a phenomenon that was responsible for the deaths of pre-spawned dogs and pink salmon across Alaska during the summer of 2019. Salmon are also observed to be smaller. A common method of cutting fish to dry is called the "butterfly cut," or the "blanket cut," where the backbone is removed and two similar-sized salmon are tied together, dried and smoked. Some women are noticing that these cuts are not being used or taught with the smaller-sized salmon.

A decrease in the snowpack will result in low water levels as the river is snow dominant in the middle of Kuskokwim. The Kuskokwim River is a vital salmon migration corridor, while the gravel beds in smaller streams and tributaries provide essential spawning and rearing habitat. Residents have observed that some smaller streams have dried up and can no longer support spawning salmon. Young salmon depend on riverbank vegetation to rest and avoid predators, but some salmon streams in the region have also become completely grown in as the water flow is reduced over time. Cold river water is an important cue for king (Chinook) salmon to begin running upriver. Residents are concerned that changes in the timing of breakup and snowmelt might cause the fish to miss this cue, leading to smaller runs. Increasing air temperatures during the summer cause the river water temperature to fluctuate and create additional pressure on fish species. Warm water holds less oxygen for fish and can also allow parasites and water-borne diseases to thrive.

Travel. Decreased snow cover, impeding travel and subsistence in winter. Ice conditions throughout winter are more variable and the river is freezing later and breaking up earlier. The Kuskokwim River Ice Road is a cost-effective travel option during winter. Changes in freeze-thaw timing, depth of ice, and frequency of open water increase the risk of accidents and injury during travel. The ability to travel safely is important for maintaining relationships between families, people, and communities in the region.

Shallow water in the rivers and tributaries prevents people from traveling up to camps, which



have great cultural and emotional importance. When the river levels are low, the barge carrying a fuel cannot reach some communities. This drives up the price of an already expensive commodity. which is causing river banks to erode more rapidly and heaving the ground, invasive vegetation is pushing out plants used for traditional medicines, declining salmon fisheries, especially chinook and chum salmon, more diseased salmon, changing moose migration patterns. Permafrost thaw is increasing the levels of arsenic, antimony, mercury in river water, leading to concerns about bio-accumulation of mercury and other metal in pike and burbot.

Mining and Red Devil Mine. The watershed area has a long and colorful mining history, dating back to the late 1830s when Russian traders discovered mercury-bearing minerals along the Kuskokwim River near Aniak. Gold was discovered in the Flat area in 1908, driving one of the last great gold rushes in Alaska. Documented mineral production in the planning area totals 3.2 million ounces of gold, 151,750 ounces of silver, 2.1 million pounds of copper, and 41,767 flasks of mercury. Twelve separate companies or individuals were estimated to be producing metals (predominantly gold) in the planning area in 2014. In 2015, there were 19 active placer mines and one active lode mine. On August 13, 2018, the U.S. Army Corps of Engineers and BLM issued a joint Federal Record of Decision, along with the Clean Water Act Section 404/Rivers and Harbors Act Section 10 permit and the Offer to Lease for the pipeline ROW at Donlin Gold. The project is currently seeking State permit approval for initial mine startup.

The Red Devil mine, abandoned in 1971, was the largest, but Cinnabar Creek also produced substantial mercury. The Red Devil Mine, which was a mercury mine on the middle Kuskokwim River, was mined from 1933 to 1971. It was the largest mercury mine in Alaska during its operational years. The mine closed in June 1971 due to a drop in mercury price, and then it was formally abandoned. There has not been any production at the mine since that time. Site investigations and sampling were conducted three times before 1990, and these investigations documented the presence of antimony, arsenic, and mercury in on-site tailings, soil, and surface water. Two waste removal actions were conducted at the site in 1999 and 2001. In 2002, the BLM demolished all the remaining site structures and constructed two monofills. In 2004, BLM performed environmental sampling. Soils investigations detected petroleum hydrocarbons and groundwater samples containing antimony, arsenic, and mercury at concentrations above Alaska Department of Environmental Conservation cleanup levels. Kuskokwim River sediments near the mouth of Red Devil Creek and in nearby downstream locations contain eroded tailings/waste rock materials that have migrated through Red Devil Creek into the river. Based on the findings of the human health and ecological risk assessments, the BLM has determined that action is necessary to protect human health and the environment from potential risks associated with exposure to actual and threatened releases of antimony, arsenic, mercury, and other metals at the site. The Bureau of Land Management is developing a Record of Decision. The BLM continues to monitor groundwater and surface water at the Red Devil Mine twice a year. Monitoring will continue indefinitely.

The Kolmakof Mine site is an abandoned cinnabar mine on the north bank of the Kuskokwim River, located approximately 19.5 miles east of Aniak and approximately 10 miles west of Napaimute. The site was mined from 1838 to 1970. BLM conducted a CERCLA Environmental Engineering and Cost Analysis for the site from 2008 through 2012, with a Removal Action Memorandum signed in May 2013. Since then, BLM has achieved all cleanup/removal objectives except at the former mercury retorting area.

Endangered, Threatened and Other Species of Importance. The Upper and Middle Kuskokwim watershed is host to endangered and threatened species and other culturally important species:

- The Kuskokwim River Raptor. The Kuskokwim River Raptor was on the endangered species list until 2000. The area between Aniak to McGrath continues to remain a critical cliff-nesting habitat and provides cliff-nesting habitat for at least 20 peregrine falcon pairs annually.
- Sheefish. Sheefish are a culturally important fish species along the Kuskokwim River; they are harvested for subsistence use by many, especially in the middle and upper river. Sheefish are often caught before salmon in the spring and offer an opportunity for fresh fish early in the season. In recent years, king salmon have been in decline, and there has been an even more significant shift in harvest patterns away from king salmon and more toward whitefish and other salmon species. Sheefish spawning grounds have particular needs and occur in small numbers on the Kuskokwim River. Eighty percent of the sheefish spawning in the Kuskokwim River spawn in a 15.5-mile section of the Big River. Disturbance to this watershed could impact the entire Kuskokwim population. Sheefish are an essential species targeted by sport fishers in streams and tributaries within the Kuskokwim River drainage, with the largest fishery occurring in the Holitna River.
- Whitefish. Broad and humpback whitefish are culturally significant species along the Kuskokwim River; they are harvested for subsistence use by residents of many communities up and down the entire river and throughout the annual whitefish cycle. Whitefish are often caught before salmon in the spring and offer an opportunity for fresh fish early in the season. In recent years, Chinook salmon have been in decline, and there has been a resulting increase in the harvest of whitefish and other salmon species. Even before the recent decline of Chinook salmon, however, whitefish were a consistently important component of the Kuskokwim River subsistence harvest, comprising between a quarter to nearly 60% of the annual non-salmon subsistence harvest. Despite the extensive distribution of whitefish in the Kuskokwim River drainage, spawning grounds are limited in number and size. Only four and two spawning areas have been identified for humpback and broad whitefish, respectively. Whitefish spawning areas are scarce in the Kuskokwim watershed and are concentrated in the

Upper Kuskokwim. Traditional ecological knowledge has indicated that whitefish abundance and size have declined in recent decades.

- Moose Calvin Ground. Known calving concentrations are mapped along the Kuskokwim River between Lake Minchumina and Sleetmute and south of Sleetmute in the Kuskokwim Mountains and Lime Hills. Known rutting concentrations are along the Kuskokwim River between Bethel and Aniak, west of the Kuskokwim River south of McGrath, and in an area west and south of the Alaska Range. Moose provides a significant amount of healthy meat to the Middle Kuskokwim communities, but changes in moose populations and health are concerning residents. Moose populations are below the Board of Game regulatory objectives due to low calf-to-cow ratios and low bull-to-cow ratios. Although moose populations have begun to recover in this area some successful hunters find that harvested moose are skinnier than usual, or have worms in the meat.

### E.1.3. Evaluation Criterion C—Implementation and Results

The proposed scope of work will be completed over a two-year time frame, during FY23 and FY24. The Native Village of Georgetown has defined the major tasks and milestones and start and end dates in the Gantt chart in Figure 5. The following narrative expands on the Gantt chart and provides an overview of costs.

Project Initiation. The project initiation phase will be from October to December 2022 (Quarter 1). As part of the project initiation, the Native Village of Georgetown will:

- Issue a press release in October 2022 announcing the watershed group development; Estimated Costs: \$40 (Labor)
- Create a Facebook page in October 2022 to easily share information related to the watershed group; Estimated Costs: \$40 (Labor)
- Invite stakeholders in October 2022 to attend the kickoff meeting and organize the kickoff meeting for November 2022 in Anchorage. The meeting could be held during the Alaska Tribal Conference on Environmental Management (ATCEM), which many stakeholders attend. The Native Village of Georgetown will hire a facilitator for the kickoff meeting. Estimated costs to organize meeting: \$4,400 (Labor).
- In November 2022, participants will meet at the kickoff meeting with a facilitator. The kickoff meeting will last a day. With the help of a facilitator, participants will set priorities, establish a date for the next meeting, identify and rank watershed issues, review the stakeholder analysis and establish a plan to research existing management

plans and data.

Estimated Costs: \$22,000 (Facilitator, Travel, and Participant Stipend).

Group Development. Group development activities will start in January 2023 (Quarter 2) and continue until September 2024. Group development activities include:

- 9 Bi-monthly meetings during which participants work on group development activities and discuss concerns and strategies for the next steps.  
Estimated Costs: \$29,000 (Participant Stipend)
- The Native Village of Georgetown will organize an in-person check-in meeting in October 2024 for participants to meet and discuss progress to date. A facilitator will be hired for the in-person meeting.  
Estimated Costs: \$26,000 (Organization, Facilitator, Travel, and Participant Stipend)
- The mission and vision statement will be developed and refined by group participants at bi-monthly meetings from March 2023 to June 2023. They will be finalized and adopted during the check-in meeting in October 2023.  
Estimated costs: Included in cost estimates of previous tasks.
- The bylaws will be developed during bi-monthly meetings from October 2023 through June 2024. The bylaws will be finalized during the August 2024 final meeting. The bylaws may include a definition of the geographic area covered by the watershed group, a statement of shared values, community and stakeholder representation, goals, general membership guidelines, quorum, decision-making, powers of members, removal of members, leadership body, powers of the leadership body, removal from the leadership body, quorum, board of directors, the election process, term of office, power of the board of directors, removal from the board of directors, quorum, policies, officers, and committees.  
Estimated Costs: Included in cost estimates of previous tasks.
- Active recruitment of stakeholders for participation in group development activities will continue from the project initiation until the check-in meeting in October 2023. Following the meeting, new participants may be invited to join group development activities based on the consensus of active participants.  
Estimated Costs: \$1,000 (Labor)

Youth Participation. The Native Village of Georgetown will organize an internship to facilitate the involvement of stakeholder youth in watershed group development activities and, once it is established, the Middle and Upper Kuskokwim Watershed Council. Intern recruitment will occur during the first quarter of the project, with the help of other watershed group participants. The intern position will start in January 2023 and run through the project's end. The intern will be remunerated with a participant stipend equal to that of the other participants. The Native Village of Georgetown staff will mentor the youth and meet with them regularly.

Estimated Costs: \$4,000 (Labor, Participant Stipend already included in cost estimates of

previous tasks)

Research (Pre-Planning Activities). From November to July 2023, The Native Village of Georgetown and other group participants will identify and research existing watershed management plans and data concerning the Middle and Upper Kuskokwim Watershed. The information collected will be shared during meetings and on the website of the watershed group. The Native Village of Georgetown and other participants will also analyze and synthesize the collected information from February 2023 to July 2024.

Estimated Costs: \$21,000 (Labor)

Funding. The Native Village of Georgetown will develop a grant funding strategy and apply for funding to ensure the continuation of the watershed group activities once the grant has ended.

- The Native Village of Georgetown will develop a grant funding strategy from October 2022 to February 2023. Developing a grant funding strategy will include developing template material for applications, identifying grants and their associated deadlines and eligibility requirements, and reaching out to funders to discuss the grant's objectives.  
Estimated Costs: \$10,000 (Labor)
- The Native Village of Georgetown will present the grant funding strategy at the March 2023 meeting and ensure all group participants approve of the strategy. Once approval is obtained, the Native Village of Georgetown will apply for grants. This task may run from March 2023 until the end of the current grant in September 2024.  
Estimated Costs: \$20,000 (Labor)

Outreach. The Native Village of Georgetown will be responsible for outreach activities throughout the grant. Outreach will start in October 2023 and conclude when the grant ends in September 2024. Outreach activities will include:

- The Native Village of Georgetown will create and update a website throughout the project. The website will include meeting information, newsletters, resources related to the watershed, and other material.  
Estimated Costs: \$10,000 (Labor, Website Hosting)
- The Native Village of Georgetown will publish five digital newsletters throughout the grant to share information regarding the watershed group development and issues and projects related to watershed management and best practices.  
Estimated Costs: \$1,000 (Labor)
- The Native Village of Georgetown will present the watershed group development at Alaska-specific conferences during the FY2024, including the Alaska Tribal Conference on Environmental Management and the Alaska Forum on the Environment.  
Estimated Costs: \$1,000 (Labor)

- The Native Village of Georgetown will prepare three handouts detailing the work performed by the watershed group.  
Estimated Costs: \$1,000 (Labor)

Project End. The project will end in September 2024, although the watershed group will continue to meet. To conclude the project:

- Participants will meet in person at a final project meeting in August 2024. A facilitator will be hired to facilitate the discussion. Participants will establish future steps, given the funding secured to date, and conduct any outstanding group development activities.  
Estimated Costs: \$26,000 (Organization, Facilitator, Travel, and Participant Stipend)
- The Native Village of Georgetown will close out the grant and prepare the final report for the Bureau of Reclamation in September 2024.  
Estimated Costs: \$3,000 (Labor).

Building on Relevant Federal, State, or Regional Planning Efforts. The proposed project will build on relevant federal, state, and regional planning efforts. The watershed group will encourage collaborative planning and implementation, and coordination among stakeholders. As part of the project, the watershed group will identify and review existing plans relevant to watershed planning. The information will be compiled and disseminated through watershed group meetings and the website. By its nature, the watershed group will collaborate across stakeholder groups and help share knowledge and build relationships that are important to the successful implementation of adaptation, mitigation, and management activities. This will ensure stakeholder and institutional understanding of existing plans. The review will include, but will not be limited to, the following plans:

- Alaska Department of Natural Resources Division of Mining, Land, and Water 2019 Kuskokwim Area Plan;
- Bureau of Land Management 2020 Bering Sea- Western Interior Resource Management Plan;
- Federal Emergency Management Agency 2017 Discovery Report for the Kuskokwim Delta Watershed;
- U.S. Army Corps of Engineers 2014 Kuskokwim River Mitigation Bank Proposal;
- Native Village of Napaimute 2013 Forest Management Plan;
- Community development plans including the plans of the Native Village of Georgetown, Native Village of Napaimute, Crooked Creek, and McGrath;
- State of Alaska Kuskokwim River Salmon Management Plan;
- 2006 Arctic-Yukon-Kuskokwim Salmon Research and Restoration Plan;
- U. S. Fish and Wildlife Service (FWS) Kuskokwim River In-Season Management Strategy
- The Kuskokwim Corporation 1997 Forest Stewardship Plan;

- 2020 Adapting to Climate Change in the Middle Kuskokwim: A Collaborative Effort by the Community of Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, Napaimute, Crooked Creek, Georgetown, Red Devil, Sleetmute and Stony River;
- The McGrath Multi-Jurisdictional Hazard Mitigation Plan.

#### E.1.4. Evaluation Criterion D—Presidential and Department of the Interior Priorities

Combating Climate Change. The development of a watershed group will help combat the climate crisis by bringing together stakeholders to develop scaled strategies to add resiliency to the watershed. The Kuskokwim River provides food, water, and transportation for communities in the region. A healthy watershed is essential for maintaining the quality of life and Indigenous cultures in the area. It is known that the watershed is experiencing rapid changes, including increasing ambient and water temperatures, higher annual precipitation, a short season for ice on the river as the river is freezing later and thawing earlier, permafrost thaw, erosion, and invasive vegetation. Effective adaptation strategies necessitate collaborations and partnerships between stakeholders, data, and local knowledge to guide decision-making and action.

Establishing a watershed group will help develop partnerships and coordinate adaptation and mitigation strategies to climate change. Through the group development process, stakeholders will work together, building trust and knowledge of each other's work, concerns, and strategies. Given the small population of the Upper and Middle Kuskokwim, there is a high likelihood that participants in the watershed group will continue their partnership outside of the group.

At a minimum, the watershed group will implement an outreach strategy to inform residents of known issues and projects occurring in the Kuskokwim. Currently, there is no uniform and systematic monitoring, research, and outreach on matters concerning the Kuskokwim watershed. Crucially, the watershed group can help coordinate monitoring and data analysis. It is hard to overstate the lack of information and data on the Kuskokwim watershed. Individual initiatives drive existing efforts to coordinate research and data collection. Institutional solid support and a framework to coordinate research will expand these efforts. The successful development of the watershed group can also result in the development and adoption of adaptation strategies, including planning, communication, and preparedness for extreme weather events; incorporating expected changes into land-use decision-making processes; improving the resiliency of shorelines, natural systems, and critical infrastructure; and applying cost-effective green technologies and using biological systems to reduce vulnerabilities.

Disadvantaged or Underserved Communities. Disadvantaged communities are identified using Executive Order 13985 and Interim Implementation Guidance for the Justice40 Initiative. Executive Order 13985 defines underserved communities as populations sharing a particular characteristic and geographic communities that have been systematically denied a full

opportunity to participate in aspects of economic, social, and civil life. Per the executive order, underserved communities include Indigenous and Native American persons, persons who live in rural areas, and persons otherwise adversely affected by persistent poverty or inequality.

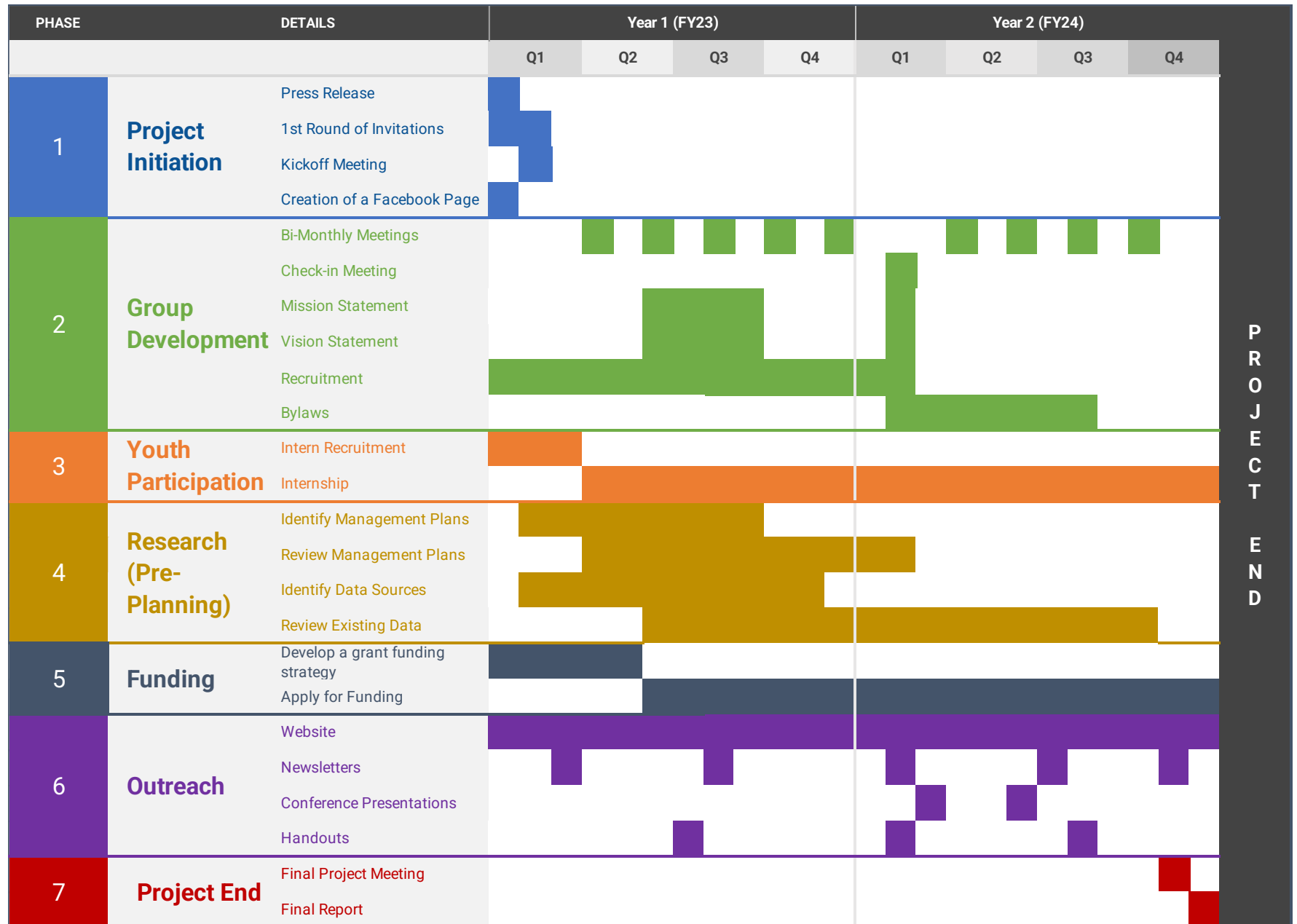
The Middle and Upper Kuskokwim communities are adversely affected by persistent poverty and inequality. The communities are remote and rural. Alaska Native people comprise most of the population in 10 of the 12 communities covered by this project. In five of the communities, over 50 percent of homes lack running water and rely on a communal shower facility and a laundromat (often combined as a "washeteria. These communities also have a high energy burden. In 2021, gas in the Middle Kuskokwim cost \$7 per gallon, compared to \$3.50 per gallon in Anchorage. None of the communities have grid access. They rely on consumer-owned electric cooperatives for their power which use diesel-fueled electricity generators for some or all of their power supplies. Per the Alaska Energy Authority, a state agency, households in the Kuskokwim region pay upwards of \$300/month for electricity.

To set thresholds, we look at the United States as a whole as reported in the 2020 United States Census and at the Census data for the communities included in the project. There is no Census data for three communities: Georgetown, Napaimute, and Telida. Per Census data, the United States has a mean household income of \$88,607, a median household income of \$62,843, 13.4 percent of the population lives below the poverty level, and the unemployment rate is 3.4 percent. We consider any community with income levels below the national average and poverty and unemployment rates higher than the national average to be low income. Eight of the nine communities within the planning area for which there is data are low-income. In these communities, the mean household income ranges from \$30,195 to \$68,940. Median household income is only reported for six of the communities. Five have a median household income below the national average (\$30,000-\$53,750). In the eight low-income communities, poverty level rates range from 19.9 percent to 75 percent, and unemployment rates range from 4 percent to 51.1 percent.

**Tribal Benefits.** The project will directly serve and benefit Alaska Native Tribes. A federally recognized Tribe is associated with each of the twelve communities this project covers. The Native Village of Georgetown is a Tribe and the applicant and will lead the development of the watershed group. The Native Village of Napaimute, another Tribe, supports the project and will also participate in group development activities. Tribes in the Middle and Upper Kuskokwim are concerned about the impact of past, current, and future mining operations and climate change on the watershed and subsistence. The watershed group will improve the ability of Tribes in the region to protect the Kuskokwim River and its tributaries by enhancing and facilitating research, monitoring, and watershed remediation. The watershed group will also support Tribal resilience to climate change by strengthening Tribal capacity to monitor and manage the watershed and by creating an information source for past and current watershed management data and projects.



**Figure 5 – Gantt Chart of Project Milestones and Dates**



PROJECT END



### D.2.2.9. Overlap or Duplication of Effort Statement

There is no overlap between the proposed project and any other active or anticipated proposals or projects in terms of activities, costs, or commitment of key personnel at the time of submission.

### D.2.2.10. Project Budget

#### Budget Proposal

Georgetown's requested Budget for the project from 10/2022 to 09/2024 totals \$199,994.10. Table 1 summarizes funding sources for the requested Budget, which covers planning, staffing, and continuation of the previously described activities. The project will be entirely funded with funding from the Bureau of Reclamation.

**Table 1** - Summary of Funding Sources

<b>Funding Sources</b>	<b>Amount</b>
Non-Federal Entities	\$0
Requested Reclamation Funding	\$199,994.10

Table 2 provides a summary of the total project cost. The entirety of the project will be funded with the requested Federal funding.

**Table 2** – Total Project Cost Table

<b>Funding Sources</b>	<b>Amount</b>
Costs to be reimbursed with requested Federal funding	\$199,994.10
Costs to be paid by the applicant	\$0.00
Value of third-party contributions	\$0.00
Total Project Cost	\$199,994.10

**Table 3 – Native Village of Georgetown's (NVG) Proposed Budget for the project period 10/2022-12/2024**

Budget Item Description		COMPUTATION		Quantity Type	Total Cost
		\$/unit	Quantity		
Salaries & Wages					
NVG	Environmental Coordinator (Barbara Johnson)	\$27.60	1,560	Hours	\$43,056.00
	Program Director (Eric Dietrich)	\$28.80	325	Hours	\$9,360.00
	Tribal Administrator (Adrian LeCornu)	\$30.00	200	Hours	\$6,000.00
	Environmental Assistant (Fredrika Prince)	\$24.00	300	Hours	\$7,200.00
Participant Stipend		\$2,667	11	Participant	\$29,333.00
Fringe Benefits					
Full - Time Employees (@ 31.25%)		-	-	-	\$18,255.00
Part - Time Employees (@ 31.25%)		-	-	-	\$11,417.81
Equipment					
N/A					
Supplies and Materials					
Website Hosting		\$200.00	2	Years	\$400
Contractual/Construction					
Facilitator		\$2,000.00	3	Meetings	\$6,000.00
Third-Party In-Kind Contributions					
N/A					
Other					
Travel		\$16,929.00	3	Meetings	\$50,787.00
Indirect Costs					
De Minimis		10%	Base: \$181,812.80		\$18,181.28
<b>TOTAL ESTIMATED PROJECT COSTS</b>					<b>\$199,994.10</b>

Budget Narrative

Georgetown's requested budget for the project for the period 10/2022-09/2024 totals \$199,994.10. Table 3 details Georgetown's requested funding, covering planning, staffing, and continuation of the previously described activities.

Salary & Wages and Fringe Benefits. Salary cost is for Barbara Johnson, Georgetown's Environmental Coordinator, three Georgetown support staff, and 11 participant stipends at \$3600/each, assuming participation in 12 meetings throughout the project duration and including fringe benefits of 31.25%. One of the participants will be a youth intern. Native Village of Georgetown staff will not perceive a stipend.

All personnel costs include benefits and overtime and were estimated using the State of Alaska salary calculator. Fringe benefits vary by position and are included in the salary cost; they include: FICA (6.5%), Medicare (1.45%), Workers Comp (9.49%), Unemployment (1.5%), and Health (12.3%) insurance.

- NVG Environmental Coordinator (Barbara Johnson) is the project coordinator. Her hourly cost is \$27.60, excluding fringe benefits at 31.25%. The Environmental Coordinator will spend 1,560 over the project period planning, assisting with participant recruitment, participating in group development activities, conducting research, analyzing data, youth mentoring, applying for additional grants, and final report submission.
- NVG Program Director (Eric Dietrich) will provide general project support. The hourly cost is \$28.80, excluding fringe benefits at 31.25%. The Program Director will spend 325 hours on the project to assist with recruitment, build and update a website, develop GIS maps, and grant applications.
- NVG Tribal Administrator (Adrian LeCornu) will help draft bylaws, support recruiting participants, and review funding applications. The Tribal Administrator will spend 200 hours on the project at an hourly cost of \$30.00, excluding fringe benefits at 31.25%.
- NVG Environmental Assistant (Fredrika Prince) will assist in recruiting participants, keeping the website updated, identifying grant opportunities, and mentoring the youth participant. The Environmental Assistant will spend 300 hours on the project at the hourly cost of \$24.00, excluding fringe benefits at 31.25%.
- Participants are stakeholders participating in group development activities, including meetings, preparing for meetings, research, drafting bylaws, and outreach. Georgetown budgeted for 11 participants to attend 12 meetings throughout the project. Participants will receive \$222 per meeting attended, covering activities and work before and during the meeting, excluding fringe benefits at 31.25%.

Supplies and Material. Georgetown will purchase a website hosting subscription at an annual cost of \$200 for the Watershed Council website. This estimate is based on the yearly cost of a Squarespace and WordPress website.

Contractual. Georgetown will contract with a facilitator to facilitate the three in-person meetings at \$2,000 per meeting. The estimate is based on a quote from the University of Alaska Anchorage Business Enterprise Institute for facilitation services.

Other. Participants will be invited to attend three in-person meetings throughout the project. The meeting will be hosted at The Kuskokwim Corporation offices in Anchorage, and the grant will be used to cover lodging, airfare, and per diem. Budgeting for 11 round trip airfares for each meeting at \$600 per R/T for a total airfare cost of \$19,800 (11 flights @ \$600 = \$6,600 for three meetings = \$19,800). Using the DOD Per Diem Rates, we estimate per diem at

\$339/person/meeting and lodging at \$600/person/meeting for a total per diem cost of \$11,187 for the duration of the project and a total lodging cost of \$19,800.

Indirect Cost Rate. Georgetown will use the de minimis rate of 10% as detailed in the NOFO.

#### **D.2.2.11. Environmental and Cultural Resources Compliance**

**Q: Will the proposed project impact the surrounding environment (e.g., soil [dust], air, water [quality and quantity], animal habitat)? Please briefly describe all earth-disturbing work and any work that will affect the air, water, or animal habitat in the project area. Please also explain the impacts of such work on the surrounding environment and any steps that could be taken to minimize the impacts.**

A: The proposed project will not impact the surrounding environment. Any monitoring work will be done using minimally invasive techniques, such as temperature sensors and YSI meters.

**Q: Are you aware of any species listed or proposed to be listed as a Federal threatened or endangered species, or designated critical habitat in the project area? If so, would they be affected by any activities associated with the proposed project?**

A: There are some critical habitats in the Middle and Upper Kuskokwim (See section E.1.2.1 - Critical Watershed Needs) but they will not be affected by any activities associated with the proposed project.

**Q: Are there wetlands or other surface waters inside the project boundaries that potentially fall under CWA jurisdiction as "Waters of the United States"? If so, please describe and estimate any impacts the proposed project may have.**

A: The monitoring activities would occur on the Kuskokwim River, near some wetlands. The monitoring is not expected to have any impact on the wetlands.

**Q: When was the water delivery system constructed?**

A: This question is not relevant as the project does not include a water delivery system.

**Q: Will the proposed project result in any modification of or effects to, individual features of an irrigation system (e.g., headgates, canals, or flumes)? If so, state when those features were constructed and describe the nature and timing of any extensive alterations or modifications to those features completed previously.**

A: The project will not result in any modifications of or effects on, individual features of an irrigation system.

**Q: Are any buildings, structures, or features in the irrigation district listed or eligible for listing on the National Register of Historic Places? A cultural resources specialist at your local Reclamation office or the State Historic Preservation Office can assist in answering this question.**

A: This question is not relevant as the project is not in an irrigation district.

**Q: Are there any known archeological sites in the proposed project area?**

A: The water monitoring will not be done near any known archeological sites.

**Q: Will the proposed project have a disproportionately high and adverse effect on low income or minority populations?**

A: The proposed project will not have a disproportionately high and adverse effect on low income or minority populations.

**Q: Will the proposed project limit access to, and ceremonial use of, Indian sacred sites or result in other impacts on tribal lands?**

A: No

**Q: Will the proposed project contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area?**

A: No

#### **D.2.2.12. Required Permits or Approvals**

No permits or approvals are required.



Native Village of Georgetown  
5313 Arctic Blvd – 104  
Anchorage, Alaska 99518

Dear President Traci Maczynski,

I am writing to express my support for the application of the Native Village of Georgetown to the Bureau of Reclamation WaterSMART Cooperative Watershed Management Program Phase I grant. This letter of support also serves to express our interest and willingness to participate in activities to develop a Middle and Upper Kuskokwim Watershed Council.

The Kuskokwim Corporation (TKC) is a for-profit ANCSA corporation formed by merging 10 village corporations from the middle Kuskokwim Region in 1977. The ten villages that make up TKC include Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, Napaimute, Crooked Creek, Georgetown, Red Devil, Sleetmute, and Stony River. TKC is involved in the Kuskokwim Watershed through its work as landowners and managers, subsistence and cultural advocacy, collaborative efforts with our tribes and communities in the region, including the Native Village of Georgetown.

As one of our original villages, Georgetown and TKC have been long-time collaborators. Whether through our community contributions program, education and advocacy of land related issues, and even shared office space at one time, we are glad to support the efforts of our tribes. The Native Village of Georgetown's initiative to develop a regional Watershed Council will benefit people far beyond the tribal citizens of Georgetown and we fully support their application.

Sincerely,

Jonathan Samuelson  
Community Relations & Projects Director,  
The Kuskokwim Corporation





*P. O. Box 1301 Bethel, AK. 99559  
Ph: (907)543-2887, Fx: (907) 543-2892  
Email: napaimute@gci.net*

From: Dan Gillikin, Environmental Director  
Native Village of Napaimute

3/18/2022

To: President Traci Maczynski  
Native Village of Georgetown  
5313 Arctic Blvd – 104, Anchorage, AK 99518

Dear President Traci Maczynski,

It is my pleasure to write a letter in support of the application of the Native Village of Georgetown to the Bureau of Reclamation WaterSMART Cooperative Watershed Management Program Phase I grant. This letter also serves to express our interest and willingness to participate in activities to develop a Middle and Upper Kuskokwim Watershed Council.

For many years, the Native Village of Napaimute has contributed significantly to outreach efforts and watershed management partnerships throughout the Kuskokwim Region. Partners have included; US Fish and Wildlife, Alaska Department of Fish and Game, Pacific States Marine Fisheries Commission, the Environmental Protection Agency, The Kuskokwim Corporation, Artic Yukon Kuskokwim Sustainable Salmon Initiative, Kuspuk School District, Excel Alaska, and Donlin Gold. These partnerships have funded a host of projects from monitoring salmon abundance, in-season and post-season harvest, collection of environmental data, stakeholder and youth outreach, technical support, and structured decision making workshops.

The Native Village of Napaimute and the Native Village of Georgetown frequently collaborate on environmental projects. In the past decade, we have worked together to monitor the watershed by collecting environmental data and through a data analysis workgroup and on a regional climate change adaptation plan.

In conclusion, the Native Village of Napaimute supports the efforts of the Native Village of Georgetown as they seek funding for this project and looks forward to any opportunities to continue collaboration on future projects. The communities of the Middle and Upper Kuskokwim would benefit greatly from a Watershed Council.

Best regards,

/s/ *Daniel D. Gillikin*

Daniel Gillikin  
Environmental Director / Partners Biologist  
Cell #: 907-545-0564  
dangillikin@gmail.com

**D.2.2.14. Official Resolution**

**RESOLUTION 22-03**



**A RESOLUTION APPROVING AND SUPPORTING SUBMISSION OF AN APPLICATION FOR THE BUREAU OF RECLAMATION WATERSMART COOPERATIVE WATERSHED MANAGEMENT PROGRAM PHASE I GRANT**

**WHEREAS**, the Native Village Georgetown is fully authorized to act on behalf of the Native Village of Georgetown in matters arising out of the WaterSMART Cooperative Watershed Management Program; and

**WHEREAS**, the Governing body of the Native Village of Georgetown is a five-member council empowered to act for and on behalf of its Tribal Members in adopting this resolution; and

**WHEREAS**, Chairperson Traci Maczynski has legal authority to enter into an agreement with the Bureau of Reclamation; and

**WHEREAS**, the mission of the Native Village of Georgetown Environmental Department is to protect the health of the Kuskokwim River and George River; and

**WHEREAS**, villages in the Middle and Upper Kuskokwim regions have collected and continue to collect data to establish the water quality baseline of the Kuskokwim River; and

**WHEREAS**, the creation of a Middle and Upper Kuskokwim Watershed Council to promote the sustainable use of water resources in the watershed would enhance and complement the current water monitoring work along the Kuskokwim; and

**WHEREAS**, the Native Village of Georgetown will work with the Bureau of Reclamation to meet established deadlines for entering into a grant agreement; and

**NOW, THEREFORE BE IT RESOLVED**, that the Native Village of Georgetown authorizes, approves and supports the Environmental Department staff to submit a WaterSMART Cooperative Watershed Management Program Phase I Grant application on behalf of the Native Village of Georgetown; and

**BE IT FURTHER RESOLVED**, this resolution shall remain in effect until such a time as this resolution has been expressly rescinded.

**CERTIFICATION**

**ATTEST THAT THE RESOLUTION ABOVE WAS PASSED AND APPROVED BY A CONSTITUTED QUORUM OF THE COUNCIL BY A VOTE OF 3 IN FAVOR, 0 AGAINST, AND 1 ABSTAINING ON MARCH 26, 2022.**

ATTESTED:

A handwritten signature in black ink, appearing to read 'Traci Maczynski', followed by a horizontal line.

Traci Maczynski, Chairperson

A handwritten signature in black ink, appearing to read 'Valerie Dudley', followed by a horizontal line.

Valerie Dudley, Secretary

**D.2.2.15. Conflict of Interest Disclosure**

No actual or potential conflict of interest exists at the time of submission.

**D.2.2.16. Single Audit Reporting Statement**

The annual expenses of the Native Village of Georgetown are below \$750,000 so there is no requirement to submit a Single Audit Report.

### **D.2.2.17. Certification Regarding Lobbying**

#### Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.



Barbara Johnson  
Environmental Coordinator  
Native Village of Georgetown