

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

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Phone: 267-2199
File: CSU-NPS-Porc/Sheen

18 May 1982

Mr. Jim Morris
National Park Service
540 West Fifth Avenue
Anchorage, Alaska 99501

Dear Jim:

Per your request, we circulated the draft Draft EIS, for Porcupine and Lower Sheenjek wild and scenic river studies, amongst the involved State representatives and received the comments below from the available reviewers.

You have also requested that any additional proposals or alternatives also be submitted before the Draft EIS is published. Unfortunately, the State may wish to submit such a position but, as of this date, has not received enough information from the federal agencies, regarding management implications and questions, to be able to do so. The State has requested both formally and informally that the study decisions be delayed until this information has been made available, so that the State can formulate positions.

Draft Draft EIS--informal comments

SUMMARY, Areas of Controversy, para. 1--add: People also fear, from past experience, that USF&WS will not allow them to rebuild existing cabins if they are lost due to accidents.

SUMMARY, Proposals, para. 4: Is there a definition of "natural character" either generally or specifically for these rivers? Or who will define it?

SUMMARY, Proposals, para. 6: The lateral boundary discussion should be better defined, e.g. a maximum distance or a map.

Description of the Proposals and Alternatives

Page 5, para. 2: At no time has the study group addressed the tributaries of the Porcupine for inclusion. Mention of them is not appropriate at this stage.

Page 5, para. 2: The first sentence assumes that congress is going to designate the river area to the National System. It should read as follows: Detailed lateral boundaries will be established by the Fish and Wildlife Service if Congress acts to designate the river area to the National System.

Page 8 (Administration) para. 4: "Continuation of existing uses...including,"--add: trapping

Page 17 (Administration) para. 4: Trapping should be specified under 'continued uses'.

Page 18, para. 2: There should be a provision for replacement of existing cabins lost by accident.

Page 19, para. 1: Should the proposal be treated equally as an alternative and then be discussed as the preferred alternative?

Page 20, para. 1: Change floatboating to just boating. Present wording excludes motorboats which are included in the discussions later in this section.

Page 24, para. 1, line 4: Is the record a "minus" 75°F? (or -75°F)

Page 27, para 1: Trapping is one of the most important land uses and should be addressed as well in this section.

Page 42, para 2: While it is true that recreational floatboating is on the increase statewide, we have seen a tremendous increase in the number of riverboats on Alaskan streams. This paragraph should include both methods of recreational boating.

Page 46: Based on the general knowledge of life history and ADF&G's studies in nearby areas, one would expect to find chinook and coho salmon rearing in backwater habitats. Chum salmon, particularly the fall chums common in these drainages, seek out upwelling spring areas to spawn. These upwellings occur in every habitat type and often are found in "backwater" areas. ADF&G suggests that the scientific names be included. Unfortunately this still will not help the local residents in reading the document since many people refer to the coho as "silvers" and chinooks are also known as "kings".

Page 47, para. 1: The Black River is also an important spawning area in the Porcupine River drainage. Comparative escapement data are lacking because of the "stained" water in the Black River.

Page 48: Commercial salmon fishing is closed on the Porcupine which may have more to do with the lack of commercial fishing effort than the stream's remoteness! However, the fish produced by the Porcupine River contribute to both the commercial and subsistence fishery in the 1,002 miles of the Yukon River downstream of the Porcupine.

Page 48, para. 2: Add new paragraph--"There are no fisheries enhancement/rehabilitation projects identified at this time on the main stem of the Porcupine River by the Fisheries Rehabilitation, Enhancement and Development (FRED) Division of ADF&G. Since salmon utilize the Porcupine River drainage and little research has been done on them, the FRED Division would like to have the option to conduct future investigations, stock assessments, and implementation of established fisheries enhancement techniques along the river and its tributaries. Limited background data shows salmon runs in the Black River and

Salmon Trout River, tributaries of the Porcupine, have been depressed and either of these areas may provide an opportunity for rehabilitation." At this time the Division does not know if their potential projects will be affected by Wild and Scenic River management guidelines. Suggested guidelines for fisheries enhancement are attached to this letter from FRED Division.

Page 53, Para. 1, line 5: In its southward "course", the river...rather than "flight".

Page 55 Geology and Minerals, para. 2: DMEM of DNR points out that a State mining claim is located in T34N R17E S13 FM and is not mentioned.

Page 58 Wildlife, para. 1: "...caribou from the Porcupine herd are sometimes found near...."

Page 58, para. 3, line 1: Sanderlings

Page 59: The use of scientific names for species is not consistent throughout the report.

Page 61: The sentence "Commercial harvest largely occur downstream of the village of Anvik and no upstream commercial fishing is permitted in the Porcupine River drainage which includes the Sheenjek River" is accurate but easily misunderstood. Commercial harvests occur in the Yukon River throughout its length, not just downstream of Anvik where the majority of the harvest does occur. The relative contribution of the upstream tributaries (like the Porcupine) increases in the commercial fishery occurring above Anvik since there are fewer streams contributing to the available number of fish. Commercial fishing for salmon is prohibited in the Porcupine drainage. Commercial fishing for other species could occur legally if there were any interest.

Page 62: The Tanana, Porcupine and White River drainages are not the only ones which produce fall chums. Fall chum populations exist in other areas (Chandalar, for example) but comparative escapement data are lacking due to water conditions, remoteness and incomplete stream surveys.

Page 63: Saying the Yukon River "contributes 1% or less of the total number of Alaskan salmon harvested" is not "somewhat misleading" it is grossly misleading. The Yukon contributes an average of 15% of the king salmon harvest and 18% of the chum salmon harvest.

Page 63: There are no current plans for fishery enhancement projects in the main stem of the Sheenjek River by the FRED Division of ADF&G. However, basic fisheries research has just been started in this remote area and some salmon populations may be depressed. Until such time as all fish distributions, critical fish habitats, and spring locations are known and all water bodies and fish stocks have been evaluated in terms of the need or potential for rehabilitation/enhancement, the FRED Division cannot definitely identify all of its potential needs. As additional data becomes available, the FRED Division requests that the accompanying management guidelines be allowed on Wild and Scenic Rivers.

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Page 71, para. 3: "greyling" should be grayling.

Page 76 (b. Transportation): Will facilities potentially be permitted on federal lands also? This should be specifically addressed.

Page 80 and 87: The increase in recreational use caused by designating the rivers is not mentioned as an adverse impact to subsistence. The testimony at the hearings indicated that the local residents considered an increase in recreational use to be in conflict with subsistence.

General Comments:

This EIS combining the two rivers may be convenient for the writer, but it is confusing for the reader that is unfamiliar with the characteristics of the two rivers. Separation of the two would make the information easier to understand and aid the decision making and public review processes.

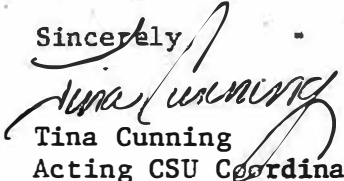
Location maps should be included in this EIS showing the area of Alaska, river corridor, land status, villages, etc.

In general, this manuscript is characterized by poor organization, a lack of editing and proofreading, and a demonstration of poor research techniques. However, a good editor could rework the manuscript so that the document will be of use. The writer should cite references in the text so that the reader knows the source of the data, and, in particular, should present the data upon which the author is basing his conclusions. Overall, this latter point is a noteworthy weakness of the manuscript.

Specifically, the sections which pertain to socio-economics, subsistence activities and the local economy, and land use are inadequate. Little data are presented, the sources of the data are generally lacking, and the method by which the data were derived are never cited. Oftentimes, conclusions are drawn without any presentation of data from which they are derived. Thus, the reader has no means by which to assess the conclusions. In addition, no section of the manuscript addresses subsistence per se. Nor is there any presentation of the potential for facilities (of any kind), development, habitat modification, and enhanced protection and the impact of these actions on subsistence. Because of these shortcomings, the reader cannot weigh the costs and benefits of the proposed wild and scenic river designations.

The State agency representatives who reviewed the draft for you expressed their appreciation of the opportunity and hope that the above informal comments will be of use in your preparation of the final DRAFT EIS. Please let us know if we can be of any further assistance.

Sincerely,


Tina Cuning
Acting CSU Coordinator

cc: S. Eide
Contributing State reviewers