

File

344-0541

20 September 1982

Mr. Bill Welch  
National Park Service  
540 West Fifth Avenue  
Anchorage, AK 99501

Re: Yukon-Charley Rivers Issues Scoping Document

Dear Mr. Welch:

The following comments or opinions were provided by several State agencies.

Alaska Department of Transportation and Public Facilities (DOT/PF) offers the following comments on issues three, eight, and eleven.

#3. Use on or Adjacent to the Yukon River.

The direction and intent of the statements on page six regarding this issue are not clear. Since the Yukon River is a navigable waterway, and navigable waterways, to the mean high water line, were conferred to the state, and since navigation along the Yukon is guaranteed by the 1871 Treaty of Washington; we would suggest that the NPS research their area of jurisdiction. The Yukon-Charley Rivers CMP should address such development as camping sites, moorings, and other facilities along the shore in their jurisdiction.

#8. Upper Charley Fixed-Winged Aircraft Landings.

We fail to understand how aircraft landings at the airstrip has become an issue at all. We are not aware that there is a problem with aircraft landings there. ANILCA does provide for the continuation of such landings. Is the present situation having an adverse affect on the protection of the area? The statement by NPS does not mention that it is, and if it isn't why is this an issue at all? If and when the use of the airstrip increases to where it begins to harm the environment, simply regulating the number of landings or directing them to other areas should solve the problem. Until it is determined that the existing airstrip, whose continued use is provided for under ANILCA, is detrimental

to the environment, there is no need to create an "issue" of landings there.

#11. Change in Access To or Within the Preserve.

We do agree that an increase in access would have its effects on the Preserve. As with anything, increased access has both its advantages and disadvantages. It should be pointed out that the newly completed Circle Hot Springs to Eagle Reconnaissance Study has identified an approximate alignment for a highway through the Preserve. Also we have been requested to upgrade the Seventy mile Trail to channel access to mining in that region. The completion of the Reconnaissance Study does not presuppose that DOT/PP has any plans to progress on this project.

Thank you for the opportunity to review and comment on this information.

Alaska Department of Natural Resources (DNR) has reviewed the issues scoping for Yukon-Charley Rivers and offers the following comments:

The Division of Land and Water Management (DLWM), Water Management Section, suggests that the management agency work DNR, DLWM, to ensure that future development does not affect existing water uses or exceed the availability of the resource. To preclude activities upstream and out of the management area from impairing the quality of the area by reducing the flow rate in streams, DLWM, WMS, suggests that the management agency apply to DLWM for an instream flow reservation.

Game Division of Alaska Department of Fish and Game (ADF&G) provided the following:

Issue I. There does not need to be a conflict between ADF&G and NPS management in the Preserve. If NPS will protect habitat from incompatible development and provide for a natural fire regime, their responsibilities will have been fulfilled. If ADF&G manages game populations, then there will be healthy wildlife populations in the Preserve and annual human harvests as well.

NPS has been given a new responsibility in ANILCA: to provide for both "subsistence" and "sport" hunting in the Preserve. Old NPS policies for managing nonconsumptive parks must be abandoned if Congressional mandates are to be met. The concept of preserves is the nearly ideal management situation of managing game without the pressures brought to bear through incompatible developments.

ADF&G must be allowed to gather data on hunted populations in the preserve and be allowed to undertake timely management programs if management options, including hunting in the preserve, are to be assured.

If the Fortyaile caribou herd is to be rehabilitated, wolf control may have to be accomplished in the vicinity of the calving area in the Preserve. The same applies to moose populations along the upper Yukon River, so important to residents of Eagle. It is not proposed that wolf populations be eliminated in these areas, only that they be temporarily adjusted downward to allow for increased survival of moose and caribou.

By providing for active management programs proposed by ADF&G, potential conflicts between "subsistence" hunters, "sport" hunters and nonconsumptive users may be largely avoided. If, however, NPS takes the position that uncontrolled "subsistence" hunting and nonconsumptive uses are permissible, but that significant predator management and "sport" hunting are undesirable, NPS will set the stage for difficult political and game management situations in the future. Additionally, neither NPS nor their special interest groups (i.e., subsistence, poachers and preservationists) have knowledge and experience to manage for consumptive use of wildlife. ADF&G does and this distinction should be made clear in the GMP.

ADF&G Subsistence Division noted the following:

The Park Service has done an excellent job in identifying the issues and presenting them to the public in their booklet.

From the perspective of subsistence use of fish and wildlife, the Park Service is clearly aware of their responsibilities to ensure a subsistence priority for rural residents on Alaska National Interest Lands and this is made evident in their statement of issues. We will look closely at the alternatives for management of the Preserve which will be identified in Step 2 of the GMP process. We anticipate that Richard Caulfield's 1977 report "Subsistence Use In and Around the Proposed Yukon-Charley National Rivers" will provide much of the data on subsistence resource use for the Preserve at this point in time. Within the coming year, however, we plan to update that study and assess changes in subsistence use of the Preserve area during the past five years. To this end, we would like to pool our resources with those of the National Park Service so that we will have suitable areas, so that management alternatives can be best evaluated.

On this latter point, we understand that a formal agreement would be necessary between both parties for joint research development and research undertakings. This should be addressed in any future planning.

ADF&G Commercial Fisheries Division provided the following comments:

Issue 1 seems to be understated. Since ANILCA Section 1314 gives the Department fish and wildlife management and Section 1316 requires NPS to coordinate and cooperate with virtually everyone, it would seem that coordination and cooperation agreements with ADF&G are required not "may be necessary." In addition, they need to seriously look at our goals, their goals and compare them in the harsh light of reality rather than the darkness of rhetoric. Fish populations have always been managed by the Department to "sustain natural healthy populations" since such populations are necessary to providing a sustained yield. In addition, the Department has also actively managed habitats to this end. In fact, the divisions of Habitat and Fisheries Rehabilitation and Enhancement, specialize in maintaining and protecting habitats. Therefore, NPS perception of differing goals is either mistaken or based on a goal NPS is not presenting; one of the Department's management goals has been "to conserve habitat and populations of fish and wildlife."

Issue 1 can be further resolved by NPS participating in the regulatory process of the Boards of Fisheries and Game. This would satisfy many of the requirements by ANILCA for coordination and cooperation with many diverse groups. Their participation would reduce the number of regulation books that users of the Preserve would have to be familiar with. Issue 1 will not be an issue if NPS realizes that: they are required by ANILCA to coordinate and cooperate with ADF&G; our goals are not different; they should participate in the Boards of Fisheries and Game regulatory procedures that were recently approved by the Department of the Interior.

Issue 3 has vastly oversimplified the use of the Yukon River in the Preserve since transportation is not its only use. Both commercial and subsistence fishing occurs in the Yukon River within this unit. In 1981, 65 families reported a subsistence harvest of 3,232 king and 28,144 chum salmon from the Yukon within the Preserve. The recent 5 year average annual harvest reported for the area is 20,800 salmon. The largest harvest from the area was reported in 1979 by 75 families who took 34,600 salmon.

The commercial fishery in the Preserve has taken an average annual harvest of 1,800 salmon in the last 5 years. Five fishermen fished commercially in the Yukon-Charley Preserve in 1981 and took 749 king and 4,121 chum salmon.

The subsistence and commercial fisheries in the Preserve are important to the local residents. These fisheries and the fish populations that contribute to them need to be considered in the NPS management plans for the Yukon-Charley preserve. King and coho salmon are known to rear in the Kandik, Nation and Charley Rivers in the preserve. Unfortunately, at this time the spawning areas and full extent of the salmon distribution in the area is unknown. NPS in addition to recognize the existence of the fish

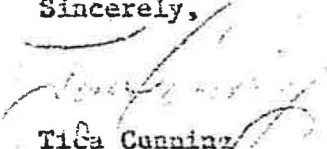
and fisheries in the preserve (totally absent in this document), needs to resolve two other issues:

1. Since commercial fishing does occur within this preserve and reference of this activity is not made in Section 205 of ANILCA, what will be the ultimate impact on commercial fishing?
2. What is meant in ANILCA by "level of such use during 1979?" Does level translate as effort, harvest, or both?

Another issue not addressed is the treaty obligations with Canada concerning the use of the Yukon and other transboundary rivers in the Preserve. These obligations should be presented since they will affect management of the preserve.

Thank you for allowing us the opportunity to respond to this document. Please let us know if assistance is needed in meeting informational requirements of ANILCA in the General Management Plan.

Sincerely,



Tica Cunniff  
Acting CSU Coordinator

cc: State CSU Contacts