

STATE OF ALASKA

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DIVISION OF GOVERNMENTAL COORDINATION

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April 27, 1990

Mr. Gene R. Keith
Glennallen District Manager
Bureau of Land Management
Alaska State Office (918)
222 West Seventh Avenue, #13
Anchorage, AK 99513

Dear Mr. Keith,

In response to the Bureau of Land Management (BLM) newsletter of March 12, 1990, the State of Alaska offers the following comments regarding the "eligibility" of thirteen possible additions to the National Wild and Scenic River (W&SR) System as identified in BLM's planning effort for Southcentral Alaska. We understand that a more thorough "suitability" determination will be made as part of BLM's draft Southcentral Resource Management Plan (RMP), scheduled for release later this year.

The State recognizes that BLM believes it is required by Section 5(d) of the Wild and Scenic Rivers Act to study possible additions to the W&SR System as part of its resource management planning process. We also understand that BLM has determined that ANILCA Section 1326(b) (the so-called "no-more clause") is not applicable in this instance since the Southcentral RMP is not "for the single purpose of considering the establishment of a conservation system unit."

Notwithstanding these considerations, the State recommends that the draft plan include alternatives to recommended W&SR designations. There are numerous administrative options for managing recreation and/or important resource values without Congressional designation of new CSUs. The Resource Management Plan currently in progress is the appropriate vehicle for accomplishing this.

The State recognizes that "eligibility" (meeting the minimum physical requirements) is just the first step in studying W&SR potential. The "suitability" or desirability of recommending designation is a separate decision. When the draft RMP is released, the State will scrutinize any rivers proposed as suitable under the following criteria, among others.

- o Do these rivers possess unique or outstanding features in the context of the region and Alaska as a whole?

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- Do land status considerations indicate that BLM will have little, if any, role in managing the river corridors?
- Would potentially viable hydroelectric developments be precluded?
- Would existing or potential mining activity or other development activities be unreasonably curtailed or precluded?
- What new recreation opportunities would be created? How would existing recreation use be affected?
- How would potential increases in recreation use affect subsistence/local use, e.g. competition for resources, disturbance of wildlife?
- Would existing or potential access opportunities (for development, transportation, recreation, subsistence, etc.) be unreasonably curtailed or precluded?

BLM should also refer to the "A Synopsis for Guiding Management of Wild, Scenic and Recreational Rivers in Alaska", adopted unanimously in November, 1982 by the Alaska Land Use Council. These guidelines, approved by the Solicitor's and Attorney General's office representatives, address a full range of management concerns that should be addressed in these studies.

Most of the rivers on the proposed list drain the eastern portions of the Yentna-Valdez Creek mining districts. Numerous mining claims have been located on uplands adjacent to these streams and many cover known mineral deposits. It is important to consider whether a W&SR designation of these rivers would effect the development of access into areas with mineral potential.

Similarly, BLM should document existing recreational and subsistence use and analyze management constraints that would likely accompany a W&SR recommendation and/or designation.

In a number of cases we question the appropriateness of including certain rivers. Several segments are or will be owned entirely by the State or Native corporations (i.e. the uplands will be State or Native-owned and the beds of the navigable rivers will be State-owned). For rivers where BLM expects to own little or no land, the State recommends that BLM not pursue further study. For rivers that are selected for further suitability analysis, the draft RMP should discuss the role BLM anticipates in the management of these rivers. Several rivers are also quite small. We question whether they would be able to sustain the type of use that a wild or scenic river designation would undoubtedly encourage.

Mr. Gene R. Keith
National Wild and Scenic River System

April 27, 1990

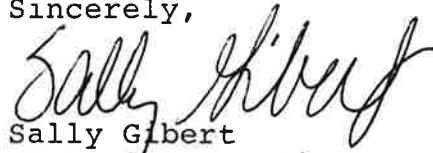
Please note that comments relative to fish and wildlife resources and their uses will be made in response to the suitability determinations in the draft RMP.

Our remaining comments, organized by river segment in the Attachment, provide information that addresses both eligibility and suitability.

When these W&SR proposals are presented to the public in the draft RMP, we suggest that the relationship between the rivers being considered and landownership be explained. There are other rivers in the planning area that have high scenic and recreational qualities that cannot be considered for the federal W&SR System because of land status.

Thank you for your consideration of these comments. We look forward to reviewing more thoroughly-documented proposals when the draft RMP is released. If you have any questions regarding these comments, please do not hesitate to contact this office or the designated contacts in the resource agencies.

Sincerely,



Sally Gilbert
State CSU Coordinator

Attachment

cc: Lynette Nakazawa, BLM, Anchorage
KJ Mushovic, BLM, Glennallen

Attachment
State Comments Regarding W&SR Study Proposals
BLM Southcentral Resource Management Plan

Susitna River, East and West Forks to the Denali Highway

These rivers flow through highly scenic areas. The State's Susitna Basin Area Plan also identified them as having high recreation values.

The West Fork is part of the State's Clearwater selection. As part of the State's General Selections Project, this area and others in the Clearwater block will be reviewed by the State to determine whether or not the State wishes to retain them. We question whether adequate access is available to these river segments. Is it appropriate to designate a W&SR that does not have access to the headwaters?

Susitna River from the Denali Highway to Indian River

This river also flows through a highly scenic area. In addition, portions of the river corridor have potential for hiking and other forms of recreation. It was also identified as having high recreation values in the Susitna Basin Area Plan.

The lower part of this river, however, from T30N R11E SM to the Indian River, has been selected by the State and Cook Inlet Region, Incorporated. The upper part of this river is part of the State's Clearwater selection. Since most of this river will not be federally-owned or managed, it is inappropriate to consider this river for W&SR designation.

In addition, a portion of this river (downstream from the point of influence of the proposed Watana Dam) has hydroelectric potential which should not be foreclosed.

The entire river has existing motor boat use, with access from Tyone or Susitna Lakes or Lake Louise. This use must be addressed in the draft RMP.

Maclaren River

This segment flows through a scenic area. The river was also identified as having high recreation value in the Susitna Basin Area Plan. Most of the adjacent uplands are State-selected, again as part of the State's Clearwater selections. This river, too, has motor boat use, with access from the Lake Louise system and the Susitna. What would the access be to the West Fork?

Dickey Lake West System

The mouth of this river is State-selected (T14N R7W CRM). We are not aware of sufficient recreational value to justify a W&SR designation. Also we are concerned that it may be too small a system to support the kind of use that designation would likely bring. In addition, we advise caution in considering areas with important cultural values. A W&SR designation will result in greater use and such use could result in destruction of the cultural values unless intensively managed.

Hungry Hollow Creek

This creek appears to offer road access to the Middle Fork of the Gulkana and therefore could potentially make a valuable addition to the W&SR system. We question, however, whether its small size would be able to sustain the use associated with designation.

Monsoon Creek/Lake

A portion of this creek runs through the previously discussed Clearwater State selection. Is it big enough to sustain the increased use that designation would likely bring?

Victor Creek

We have little information on this creek. Does it have sufficient recreation values to warrant a W&SR designation? Is it big enough to sustain the increased use associated with designation?

Tyone River

Approximately two-thirds of this river is State-selected or State-owned. The Susitna Basin Area Plan recommended the upper third for legislative or administrative designation to protect its public recreation and wildlife habitat values. This river seems an appropriate candidate for a joint federal-state evaluation and recommendation. It currently has motorboat use from the Lake Louise system to the Denali Highway.

West Fork Gulkana River (south branch and tributaries)

This appears to be a small river; however, because it connects the Tyone River with the West Fork of the Gulkana, already part of the W&SR, it may be a reasonable addition.

Fish Lake System

The portion from Fish Lake to the Gulkana may be a reasonable addition to the system. A significant part of the rest of the

system is Native-owned (the townships surrounding Ewan Lake) and the rivers are State-owned as they are navigable; thus this part of the system is not suitable for designation because there is no federal land. The rest of the system, from Crosswind Lake to Fish Lake, should be evaluated further. It may be too small to be suitable for this designation, and the land around Crosswind Lake itself is either State-owned or State-selected.

East Fork Chistochina River

This is all State or Native-owned and therefore is unsuitable for designation as part of the federal W&SR System. Also we question whether it has suitable recreation values.

Tonsina River

We assume BLM is proposing the portion of the river downstream of Tonsina Lake, since the river above the lake is not accessible. This river unquestionably has recreation value but is all State or Native-owned or selected and therefore is unsuitable for consideration as part of the federal river system.

Upper Middle Fork Gulkana River

What is the access into this system? It may also be too small to sustain the increased use associated with designation.

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April 26, 1990

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