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August 28, 1997

Mr. Jack Mosby  
Lower Sheenjek River Study  
National Park Service  
2525 Gambell Street  
Anchorage, AK 99503-2892

Dear Mr. Mosby:

Re: Lower Sheenjek Wild and Scenic River Study - Scoping

The State of Alaska has reviewed the Public Scoping and Comment Brochure for the above referenced project. The following represent the consolidated comments of the State. Although general in nature, I have numbered them for ease of reference.

1. The current low levels of recreational use of the lower river might expand if this segment of the river receives special designation. Any increase in recreational use could lead to conflicts with local subsistence uses. These subsistence uses are and have been the primary public use for many years. We ask that the revised draft EIS address this issue, including projections of future recreational use of the lower river with and without special designation, the relationship of other factors (such as topography) on recreational use of the lower river, what times of the year recreational use and subsistence use occurs concurrently, and the manner in which the U.S. Fish and Wildlife Service (FWS) would protect existing and future subsistence uses.

2. The Sheenjek River is a state-owned navigable river, per the Gulkana standard (float trip by raft capable of carrying 1000 pounds). The revised draft EIS should therefore address how the FWS proposes to coordinate State management of the water column and shorelands (lands beneath navigable waterways) with FWS management of the designated river corridor. Potential issues of concern include the imposition of fees for use of the river corridor and FWS management of boating activity on the river. This issue of coordinating management with the State is critical to the suitability determination required under the Wild and Scenic Rivers Act.


3. Regarding the Table on page 5, at line item "recreational use", the *criteria* for management under either scenario may be the same but management *actions* may become more restrictive under the Wild River scenario if recreational use increases. It may be helpful to make this distinction on the chart, or reference the discussion in the revised draft EIS on the potential for recreational use increase (per our comment #1 above). It also may be helpful at other line items to identify them as unlikely to occur, either due to limited potential, such as at oil and gas exploration and development, or incompatibility with the Refuge management plan, such as at hydroelectric development.

4. The Alaska National Interest Lands Conservation Act (ANILCA) amended the Wild and Scenic Rivers (WSR) Act as it pertains to WSR designations in Alaska. Federal and State agencies, through the Alaska Land Use Council, adopted a document titled "A Synopsis for Guiding Management of Wild, Scenic, and Recreational River Areas in Alaska" (November 1982) to identify the ANILCA-mandated differences for managing WSR's in Alaska. The draft EIS should reference this document, and provide a summary of these different criteria for Alaska WSR's. For example, transportation and utility corridors can be allowed in designated rivers in Alaska, per Title XI of ANILCA.

5. Although it may be that the "overwhelming majority" of comments received in 1984 supported designation as a wild river, we note that the majority of local public comments preferred the "no action" alternative. We urge you to address and resolve the concerns of these Alaskans most impacted by a potential wild river designation.

We appreciate the opportunity to provide these comments prior to the completion of the revised draft EIS. If you have any questions please do not hesitate to call.

Sincerely,



Alan Phipps  
Project Review Coordinator

cc: John Katz, Governor's Office, Washington D.C.  
Marilyn Heiman, Governor's Office, Juneau  
Diane Mayer, Director, Division of Governmental Coordination  
John Shively, Commissioner, Department of Natural Resources  
Frank Rue, Commissioner, Department of Fish and Game  
Joseph Perkins, Commissioner, Department of Transportation and Public  
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Michele Brown, Commissioner, Department of Environmental Conservation  
William Hensley, Commissioner, Department Of Commerce and Economic  
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