

STATE OF ALASKA

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ANILCA IMPLEMENTATION PROGRAM

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September 1, 2004

Steve Ulvi
Yukon-Charlie Rivers National Preserve
201 First Avenue
Fairbanks, Alaska 99701

Dear Mr. Ulvi:

The State of Alaska reviewed the Environmental Assessment for Stream and Trail Restoration on Coal Creek, dated August 2, 2004. This letter contains the consolidated comments of the State's resource agencies.

Woodchopper-Coal Creek Trail

Woodchopper-Coal Creek route was serialized as RST 226 as a qualifying RS 2477 route. The case file summary for the Woodchopper-Coal Creek road states: "A major portion of the route is classified as a light duty road and is indicated as such on the USGS map." The State is the primary manager of access on the route. Given its physical/"built" nature, we request NPS refer to the Woodchopper route as a "route" or a "road" rather than a trail, and we request the decision document reflect the state's ownership and right-of-way status of this route.

While not necessarily relevant to the proposed project, please note the excerpt cited on pages 24-25 of the EA from the 1985 General Management Plan (GMP) does not accurately reflect access management along Woodchopper-Coal Creek Road. In the 1985 GMP, NPS committed to cooperating with the State in identifying RS 2477 claims. Given its State right-of-way and RS 2477 status, we request NPS work with the state to refine how this issue is addressed before the decision document is finalized

State Permits Required

Please note that in addition to the fish habitat permit identified in table 1.4 of the EA, leases or other authorizations may be required from the Department of Natural Resources Northern Region Office for the use of materials (gabion rock fill from stream bed), for the placement of a portion of the gabion structure below ordinary high water mark of Coal Creek, and for the excavation and use of material from RST 226. Please contact the Northern Region Office at (907) 451-2740 regarding required authorizations for the proposed project.

ANILCA Section 810 Analysis

Even though the NPS sponsored and conducted several subsistence use studies in the Preserve, none are cited as references for preparation of this EA. We recommend NPS cite studies such as

Rick Caulfield's work from the 1970s and the yet-unpublished NPS subsistence study conducted in the early 1990s as references in this EA.

General Comments

Under "Laws, Regulations, and Policies" on page 6, the text states, "the NPS Organic Act and the General Authorities Act prohibit impairment of park resources and values." We suggest this is clearer if stated, "The NPS Organic Act and the General Authorities Act mandate the management of park resources and values for the public use and enjoyment consistent with the purposes for which park units were established and to leave the units unimpaired for the enjoyment of future generations."

We note the EA lacks cost estimates for the proposed stream and trail restoration. This information would benefit the decision document.

Please contact me at 907-269-7476 if you have questions or need more information.

Sincerely,

Don Perrin
Assistant ANILCA Coordinator

cc: Sally Gibert