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Phone: 267-2215 File: CSU-NPS-Kanektok

28 February 1983

NAUIGABILITY

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Hr. Jack Hosby Kanektok Study Teen Leader National Park Service 540 West Fifth Avenue Anchorage, Alaska 99501

Dear Jack:

The State CSU Contacts reviewed the Kanektok Wild and Scenic River Study brochure for their respective State agencies and provided the following comments:

The Alaska Department of Natural Resources (DNR) is concerned about the lack of land status information included in the brochure. The State will probably assert that the Kanektok River is navigable and, therefore, State owned. The National Park Service (NPS) has not recognized this probability. Attached is the State's Position on Navigability Criteria for Determining Ownership of Submerged Lands in Alaska.

DNR is also concerned about the presence of private land in the river corridor. Although the brochure's map includes mining claims (hopefully all are included) and village corporation lands, it does not specifically identify native allotments. What are the "private land selections" referred to on the map?

The Alaska Department of Community and Regional Affairs has developed a position: supports a "no action" alternative, i.e. no designation of the river. Wild and Scenic River designation is opposed by residents of Quinhagak. They feel increased use of the river will cause greater competition for subsistence resources and unavoidable friction between local people and recreationists. The economic benefits to the community from recreational use of the river will not be nearly enough to mitigate anticipated adverse impacts.

The Alaska Department of Fish and Game (DF&C) questioned the recreational use figura of 750 visitors and requests identification of the source of this estimate. Please contact Kim Francisco at 267-2120 in Anchorage or Keith Schultz at 543-3433 in Bethel. DF&G requests that

NPS assess or mention in the brochure the impact of increased recreational users drawn by designation. If omitted from brochures, they request NPS address the impacts in the Environmental Impact Statement. There is considerable concern that increased tourism would interfere with subsistence users and uses. DF&G is also concerned about the impact of designation on the six or seven fishing guides who use the system.

DF6G further requests that their management authority and responsibility for fish and wildlife resources be mentioned in the management alternatives. This emission may lead the public to be misinformed when reviewing and commenting on the management alternatives.

Since the State agencies and Fish and Wildlife Service are member participants of the Bristol Bay Cooperative Management Plan, the Study Group's recommendation regarding the Kanektok River should be included in the designation study and brochure. The Bristol Bay Study Group has recommended that the Kanektok River not be considered for wild and scenic river designation based on the following factors:

- 1. The portion of the river which qualifies as wild and scenic under the definition is presently in the Togiak National Wildlife Refuge Wilderness and is presently afforded the protection desired in a wild and scenic designation.
- 2. Village residents are opposed to the designation in as much as a wild and scenic river attracts additional recreational users to compete with local subsistence use of the river.

The State agencies appreciate this opportunity to participate in the Kanektok River Wild and Scenic River study. Please do not hesitate to contact us If we can provide additional information or participate further in the study efforts.

Sincerely,

Sterling Eide

State CSU Coordinator

by: Tima Cumming

State CSU Assistant

attachment

cc: L. Parker, ALUC

Bristol Bay Study Group

State CSU Contacts

(see file Navigability for complete mems)