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File: CSU-NPS-YUCH

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Bill Welch
National Park Service
540 West Fifth Avenue
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Dear Bill,

State CSU Contacts have reviewed the Yukon-Charley Rivers National Preserve Alternative Workbook. We received many favorable comments on the quality of the document, however some reviewers would have preferred a more conventional size (8½ x 11). Generally, reviewers could not recommend adoption of any of the alternatives presented. The following comments contain suggestions which can be incorporated into the State's "Preferred Alternative."

Department of Transportation and Public Facilities (DOT/PF): In a letter to David Mihalic on 30 December 1982, DOT/PF states:

We would like to mention, in regards to adjacent land use, that a Salchaket to Chicken Road proposal was never mentioned in the Interior Transportation Study (ITS) and that DOT/PF has not conducted any sort of study for this road. As was noted in the workbook, ITS has studied two means of access to the mineralized area near Twin mountain (not "Twain" Mountain as written in the workbook). ITS has concluded that the route extending Chena Hot Springs Road would be more practical than the route along the Salcha River, but no recommendation was made regarding right-of-way acquisition. A copy of the project identification and evaluation report will be available for your review in the very near future.

Alaska Power Authority (APA):

The Federal Power Sites within the Preserve should be retained. Among these are USGS Power Site Classification No.'s 445, 447, 448 and 451, dated 1/4/65, 10/15/69, 10/30/72 and 1/7/74; Yukon River Basin No. 14, Alaska.

The wording under the "Alternatives" section's "Opportunity for Management" sentence 4 should read, "to increase man's knowledge, and to protect significant archeological and paleontological resources." NPS is also reminded that ANCSA and ANILCA Cultural Resource Management agreements with Native Corporations must be complied with on lands owned by Native Corporations, in all alternatives.

Finally, APA noted that BLM limitations on development apply only to Federal lands or Federally funded projects. It should also be made clear that access to State and Native owned lands within the Preserve will be retained in accordance with ANILCA statutes.

Department of Natural Resources:

NPS should seek clarification on the issue of the land status of the Charley and other navigable rivers designated as Wild and Scenic prior to developing any plans for these rivers. NPS is also reminded that they are required to apply for instream flow reservations, once the regulations become effective, and for diversionary federal reserve water rights prior to making developments in rivers.

Department of Fish and Game (ADF&G):

The preferred alternative should include "continue all other public use activities," assuming that this includes the commercial fishery that occurs in the Preserve. While it is a very small fishery it is important to the local residents and should not be interfered with.

It is unclear whether NPS has information on subsistence users and uses within the Preserve boundaries more recent than that contained in Richard Caulfield's report, "Subsistence Use in and Around the Proposed Yukon-Charley National Rivers." The character and distribution of the human population in that region may have changed markedly in the five-year interim. If so, this must be taken into account in the GMP.

As is evident in the Alternatives Workbook, the Preserve and surrounding areas may be affected by major development activities in the next decade (e.g., mineral exploration, mining, and road construction). Whether such activities occur on or near the Preserve, they will significantly alter the circumstances regarding resource use for all user groups on the Preserve. Construction of the Taylor Highway in the early 1950's and its impact on the Fortymile Caribou Herd is an example.

The Workbook does not address the potential implications of any or all proposed development activities on either the resource base or user groups. Certainly we cannot ignore the impact of a community of 2,000 - 5,000 people on Slate Creek, which would more than double the current population in eastern interior Alaska. We can assume this would be an impetus for increased use of the Preserve by new residents and by a growing visitor population. Careful study of this and other development activities is essential in order to protect and manage the existing resource base on and near the Preserve, and to retain existing use patterns by subsistence and other user groups.

We applaud the planning team for its commitment to archaeological/paleontological research and preservation of historical and cultural resources. All such activities, however, must be examined more carefully for their effects on current resource use patterns. For example, would preservation of cultural resources conflict with existing trapping activities? Generally speaking, would research and preservation activities conflict with subsistence users opportunities to pursue subsistence activities on the Preserve?

Yukon-Charley should be managed as a Preserve, not a Park. ADF&G suggests no NPS commercial development, seasonal visitor contact sites or additional forms of visitor protection. This management should not interfere with private land developments or State opportunities to develop the Yukon Ferry.

Hunting, fishing and trapping activities should be considered primary uses of the area and access necessary to conduct such traditional activities should not be restricted. NPS should not encourage new roads in the Preserve, but they should retain unrestricted access by all traditional means not specifically prohibited in the Preserve, by ANILCA. Specific traditional access sites are presented in the State's "Resource Management Recommendations" for Yukon-Charley Preserve.

To protect healthy (NPS mandate) and productive (ADF&G mandate) wildlife populations, it may be necessary to manipulate some populations and/or habitats. One method for doing this would be the maintenance of the natural role of fire in the ecosystem, including prescribed burns in areas where wildfires cannot be tolerated. NPS should also allow ADF&G to manage selected wildlife populations to maintain natural species diversity and healthy populations.

Game Division supports protection of critical Peregrine falcon and falcon prey habitat, protection of critical habitats receiving high visitor use, and encourages cooperative scientific research and inventories.

Page "3", paragraphs 3 & 4 refer to "subsistence use cabins"; since the Preserve is open to both recreation and subsistence uses there is no need to classify these cabins for "subsistence use."

Page "4", paragraph 4 should conform to ANILCA and read "the Charley (and its major tributaries within the Preserve) a wild river."

Page "5", paragraph 2: ANILCA Title XI (particularly Section 1107(b)) describes the processes by which rights-of-way across Alaskan Wild Rivers can be applied for. This paragraph should reference this statute and not claim that crossings of the Charley River watershed are illegal.

We hope these comments will assist you in developing future alternatives for managing Yukon-Charley Rivers National Preserve. Thank-you for the opportunity to comment on these alternatives, and we look forward to working with you in preparing the GMP for the unit.

Sincerely,


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