

# STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES  
INTERIOR REGION, DESIGN AND CONSTRUCTION

BILL SHEFFIELD, GOVERNOR

2301 PEGER ROAD  
FAIRBANKS, ALASKA 99701  
(907) 452-1911

April 11, 1983

Re: River Plans

River Plans  
Bureau of Land Management  
4700 E. 72nd Avenue  
Anchorage, Alaska 99507

Gentlemen:

Thank you for the continuing opportunity to participate in planning efforts for the Delta River Management Plan. We offer the following comments for your consideration.

It would be helpful to those of us who are not familiar with the Bureau of Land Management's River Management Plan process for you to include an explanation of the steps, time frame, coordination efforts and etc.

The Department of Transportation and Public Facilities has responsibility for two federal aid highways and numerous materials sources in or near the Delta River Corridor. Included is the ongoing responsibility to plan, design, construct, reconstruct, maintain and operate the highway system. We began coordination for including recognition of these responsibilities in your planning process in the original request for input to the Environmental Impact statements years ago. We have provided input and comments several times requesting that you develop the management plan in a complementary manner with our highway needs. We have highlighted a need to reroute parts of the Richardson Highway in the future, to build new bridges, repave worn out wearing surfaces and our continuing need for material.

In this draft management plan, our responsibilities are mentioned in only the most general terms and we cannot tell whether or not we will be able to fulfill our obligations to the public without conflicting with your river management objectives.

Future upgrading on both the Denali Highway and the Richardson can be accomplished without compromising the relative values of the Wild/Scenic River. We ask that your management plan include statements that recognize the needs of the Federal-aid highway system and that future projects to improve grade and alignment, replace old structures and maintain a safe driving surface are or can be compatible with the River Management process.

you  
n.

# STATE OF ALASKA

BILL SHEFFIELD, GOVERNOR

## DEPARTMENT OF NATURAL RESOURCES

DIVISION OF RESEARCH & DEVELOPMENT

555 Cordova Street  
Pouch 7-005  
Anchorage, AK 99510  
(907) 276-2633

March 16, 1983

Curtis McVee, State Director  
Bureau of Land Management  
701 C St.  
Box 13  
Anchorage, Alaska 99513

Dear Curt:

The Department of Natural Resources has recently completed its review of the draft river management plans for Birch Creek, Beaver Creek, and Unalakleet National Wild Rivers. DNR's overall response to those plans, including a copy of this letter, will be sent to the district offices involved as part of the State's standard ANILCA review process. However, our analysis of the three documents revealed an issue so important that it deserves to be brought directly to your attention. That issue concerns the role land status plays in management planning.

It has been DNR's experience that an accurate knowledge of land status is an absolute prerequisite to the preparation of natural resource plans. Potential, probable, and existing land uses, and the nature of the political constraints within which planning is undertaken, are inextricably linked to the question of who owns the land and whether it is subject to third-party interests.

This information is especially critical where the Alaskan components of the National Wild and Scenic Rivers System are concerned, since sec. 606(a) of the Alaska National Interest Lands Conservation Act directs that the upland boundaries of the non-NPS river corridors be drawn so as not to include State or municipal lands and so that private lands are not surrounded or effectively surrounded. Thus the very boundary of the corridor cannot be determined until land status has been analyzed.

Yet all three of the draft management plans contain the statement, "Under policies of the Department of the Interior, only cursory review of State land selections and federal mining claims has been made." Fortunately, the Unalakleet draft goes on to report that, after the entire river was subjected to a navigability determination, it was found navigable up to Mile 21; that there are no federal mining claims or state selections in the corridor; that there are 28 Native allotments and eight historic place selections in the lower corridor; that a sports fishing lodge operates on private lands downstream; and that a site easement has been reserved halfway between the corridor's end and the village of Unalakleet. To supplement the text, detailed maps portray land status region-wide, including village selection and village deficiency areas. A legal description of the corridor is also given.

March 16, 1983

This careful land status work enabled the authors of the Unalakleet plan to foresee what land management conflicts might arise in the future and propose actions to resolve them. For example, upon determining that the majority of the river's course is navigable and therefore State-owned, the plan calls for a cooperative agreement with the State to identify and control incompatible uses on the navigable portions. And the need for the site easement described above became obvious only after discovering that the river's banks downstream from the corridor were nearly solidly in private ownership, leaving few legal campsites for public use.

The Birch and Beaver Creek drafts do not follow this excellent example. The land status information they present is indeed minimal and, in the case of Birch Creek, not even accurate. For instance, despite mentioning significant conflicts between placer mining and restoration of water quality in both creeks, neither plan gives any indication of the dimensions of the problem: the number of valid claims within the corridors or on tributaries outside them, whether any are patented, and how many are complying or not complying with existing water quality requirements. Nor do the plans show the extent to which Native selections, state selections, or Native allotments lie within the corridor. This despite the fact that private entries at both Birch Creek takeouts--a patented site at Jumpoff Creek and allotment applications at the Mile 130 bridge--pose major problems in river management. Although the former is at least mapped, the latter sites are not, and the text does not mention these entries or the public access difficulties that may result. Finally, BLM did not do navigability determinations for either corridor. The plans report the results of some navigability determinations that had been made on downstream reaches of Birch and Beaver Creeks during the course of prior conveyances, but 1981 findings that Birch Creek is navigable through two townships of state land were omitted entirely. And the upper portions of both rivers should have been tested against the same criteria. Once this is done, DNR is convinced that much or all of these portions will be found navigable.

Because the critical issue of who owns which tracts of land was not covered in the Birch and Beaver Creek drafts, the management implications of mixed ownership and ways to resolve potential conflicts were not addressed. It is our belief that this unsatisfactory situation should not be allowed to continue. Both to improve the quality of BLM's management plans and to allow for the early identification and eventual resolution of land use conflicts that may result from complex ownership patterns, DNR strongly recommends that you direct your staff to do the following:

- \* that navigability determinations be made for water bodies in each ANILCA unit under your jurisdiction, with the findings reported in the management plans affected; these determinations should be made by the Navigability Branch within the Division of Conveyances, rather than by district office planning staff;

Curtis McVee

-3-

March 16, 1983

- that land status in and near each unit be investigated and mapped, and its implications on land use be considered, in each management plan; and
- that the Birch and Beaver Creek drafts be revised in accordance with the foregoing, or an addendum prepared, with an opportunity for review by the State and the public before the revised portions are put into final form.

I am certain that these actions will lead to better plans and, in the long run, better management of these important lands.

Sincerely yours,



Roland Shanks  
Director

cc: Bob Arnold  
Jim Barnett

MKH:dc

# STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES  
INTERIOR REGION, DESIGN AND CONSTRUCTION

BILL SHEFFIELD, GOVERNOR

2301 PEGER ROAD  
FAIRBANKS, ALASKA 99701  
(907) 452-1911

April 11, 1983

Re: River Plans

River Plans  
Bureau of Land Management  
4700 E. 72nd Avenue  
Anchorage, Alaska 99507

Gentlemen:

Thank you for the continuing opportunity to participate in planning efforts for the Delta River Management Plan. We offer the following comments for your consideration.

It would be helpful to those of us who are not familiar with the Bureau of Land Management's River Management Plan process for you to include an explanation of the steps, time frame, coordination efforts and etc.

The Department of Transportation and Public Facilities has responsibility for two federal aid highways and numerous materials sources in or near the Delta River Corridor. Included is the ongoing responsibility to plan, design, construct, reconstruct, maintain and operate the highway system. We began coordination for including recognition of these responsibilities in your planning process in the original request for input to the Environmental Impact statements years ago. We have provided input and comments several times requesting that you develop the management plan in a complementary manner with our highway needs. We have highlighted a need to reroute parts of the Richardson Highway in the future, to build new bridges, repave worn out wearing surfaces and our continuing need for material.

In this draft management plan, our responsibilities are mentioned in only the most general terms and we cannot tell whether or not we will be able to fulfill our obligations to the public without conflicting with your river management objectives.

Future upgrading on both the Denali Highway and the Richardson can be accomplished without compromising the relative values of the Wild/Scenic River. We ask that your management plan include statements that recognize the needs of the Federal-aid highway system and that future projects to improve grade and alignment, replace old structures and maintain a safe driving surface are or can be compatible with the River Management process.


We are a bit apprehensive about our transportation systems because you have expressed similar issues in a negative context in the draft plan. As an example, why don't you evaluate aircraft operations from the viewpoint of the need to restrict rather than from the need to allow. Incidentally, restricting aircraft on the river below Tangle Lake is in direct conflict with your objective to preserve valid existing rights.

We are curious why the BLM dump at Tangle Lakes (Rock Creek) is not listed as a facility. There is a significant need for a solid waste disposal area, yet the existing landfill suffers from lack of attention and maintenance. Perhaps your contract for campground cleanup could be expanded to care for the landfill. With proper maintenance, the site would not be visible from the Denali Highway. You have expressed concern about the increasing number of campers and visitors, and providing for the accompanying increase in solid waste should be a management issue.

The Tangle River Bridge is specifically scheduled for replacement in the near future. Since it crosses the Wild/Scenic River and is entirely within the boundary, we request that the Management Plan not complicate that project.

I hope our comments are helpful in your planning process.

Sincerely,



H. Glenzer, Jr.  
Deputy Commissioner  
Interior Region

CSU Planning Office  
333 Raspberry Road  
Anchorage, Alaska 99502

FILE: CSU-BLM-UNALAKLEET

PHONE: 267-2215

5 April 1983

Wayne A. Boden  
Bureau of Land Management  
4700 East 72nd Avenue  
Anchorage, Alaska 99507

Dear Wayne:

State CSU Contacts have completed their review of the Unalakleet River draft management plan. Overall, the agency representatives were satisfied with the content of this plan, especially the clear discussions of management intent. We hope that the following comments on specific items assist you in completing the final plan:

Page 6, paragraph 2: "pursuit" is misspelled.

Page 11, paragraph 3: "withdrawl" is misspelled.

Page 12: Tamaraks should be added to the vegetation list.

Page 13, paragraph 1: According to the Alaska Department of Fish and Game (ADF&G), the discussion of the sockeye run is overstated. Unalakleet salmon runs have received more attention in the past than most of the runs in Norton Sound. Sockeye have been documented, but would be better described as rare, or unusual, rather than "significant". The streams flowing into Norton Sound have been incompletely inventoried and calling the Unalakleet "the only sockeye run in Norton Sound" may be a result of incomplete knowledge rather than a special feature of the Unalakleet species composition. The question is further confused by the lack of any clear outer points for Norton Sound. The Alaska Dictionary of Place Names describes Norton Sound as the area between the Seward Peninsula and the Yukon Delta. Using Cape Prince of Wales and Cape Romanzof as the outer points, the sockeye in the Sinuk River and Port Clarence area are also found in Norton as would be the few that occur in the Yukon. It would also make the Unalakleet the second largest river draining into Norton Sound. ADF&G doesn't record sockeyes on an annual basis in spite of the test fishing, escapement indexing, and catch sampling that occurs in the area. We would be more comfortable acknowledging their existence but prefer not to be referenced as saying they are "the only significant sockeye run in Norton Sound."