

CSU Planning Office  
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Phone: 267-2202  
File: CSU-BLM-Gulkana  
Subject: Draft Management Plan,  
Gulkana River

26 April 1983

Mr. Wayne Boden  
Anchorage District Manager  
Bureau of Land Management  
4700 East 72nd Avenue  
Anchorage, AK 99507

Dear Mr. Boden:

The State has completed its review of the draft Gulkana River Management Plan. Generally the State CSU Contacts were complimentary of the plan's content but felt it lacked detail in some areas. The following comments are offered to assist your planners in addressing those areas of concern to the State agencies:

The attached comments from Department of Natural Resources on Birch and Beaver Creeks, concerning how BLM has addressed land status and navigability, are generally appropriate to the Gulkana plan. Private and State land ownership, within and adjacent to the river corridors, is an important issue for the State. BLM has come closer to addressing these issues, but much more information is still needed. For instance, BLM correctly states that the State is challenging in court the federal navigability finding for the Gulkana River but does not discuss management implications of changes in the navigability finding.

Both the Delta and Gulkana plans refer to "public comment" many times. It should be stated how and when this public comment was solicited and how many people responded to create "public comment."

Nowhere in these documents do you mention RS 2477 roads and trails or section line easements. It should be stated how these fit into the management plans.

We are a bit apprehensive about our transportation systems because BLM has expressed similar issues in a negative context in both draft plans. 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?

Page 10: Under "Fish and Wildlife," reference should be made to local subsistence uses which occur along the river.

Pages 13 and 14: The draft plan concludes that "trapping is . . . the most important subsistence use" occurring along the Gulkana River. It mentions a few "minor subsistence uses." Subsistence Division of the Department of Fish and Game (DF&G) requests identification of the data sources. Little mention is made of subsistence uses of moose, caribou, small game, and various fish species. (Please contact Jim Fall at 267-2359.)

The last sentence on page 13 refers to spearing whitefish as a subsistence use. Spearing of whitefish is considered a method of sport fishing, according to DF&G Sport Fish regulations. There has never been a subsistence permit issued for spearing whitefish in the Gulkana River.

Page 18: Regarding your statement "The final boundary was then further adjusted to reference protracted survey section lines in order to simplify the legal description:" this action may not be consistent with ANILCA Sec. 103(b) which states "Whenever possible boundaries shall follow hydrographic divides or embrace other topographic or natural features."

Page 22: "Considerations" - 2nd paragraph: Discussions of whether or not the use of ATV's will be allowed are unclear when comparing this reference with page 41. We realize that ANILCA specifically provided for certain methods of transportation, but it also stated that other methods of transportation would not be prohibited on conservation system units where such use is permitted by ANILCA or other law. Please clarify your management intent.

Page 23: BLM states that aircraft landings would compromise the primitive qualities of the river. It should be stated how the primitive qualities would be diminished.

Pages 25 and 26: Subsistence uses of fish, furbearers and small game which occur in the river corridor should also be referenced.

Page 26, First paragraph: There is no mention of grayling. The Gulkana River grayling sport fishery is the second largest grayling fishery in the state.

Pages 26 and 43 - Water Quality: These sections need clarifying. Is there evidence that water quality is diminishing? What is threatening water quality that makes it necessary to monitor it? How are you going to maintain water quality?

Page 32, Last sentence: Fire also can alter water quality with subsequent impact of biological productivity which may have significant effects on fish populations.

Page 41: Action 1.3 states that vehicle use, other than snow machines, is prohibited without a permit. You should state what criteria was used to establish this Management Action, and how this regulation applies to RS 2477 roads and trails.

ORV use should not be limited by permit only. Access to large areas of public land, specifically the Alphabet Hills, would be restricted under a permit system. This area is one of the most important moose, caribou and bear hunting areas in Game Management Unit 13 and is for the most part accessible only by off-road vehicles.

Timing constraints on heavy equipment for mining access may be acceptable, but BLM should also specify location constraints and other specifics regarding mining regulations. Also, is it BLM's management intent that heavy equipment restrictions (15 April - 1 November) apply to large vehicles used for hunting access as well?

Page 42, Action 1.4: We are unsure as to how you can encourage existing users who are equipped with engines larger than 15 h.p. to reduce their engine size. This statement appears to be an unrealistic approach. It may be more realistic to prohibit a certain size engine in the area above the mouth of the West Fork where present use by large outboards is minimal. This would have a minimal impact on the large boat users but it would allow them continued use below that area. The floaters still have a long stretch of stream where they would not encounter power boats. Both user groups should be accommodated on the river and compromise will be necessary.

Page 42: Action 2.1 prohibits aircraft use for most of the corridor. Aircraft use a valid existing right. Your criteria used in establishing this action should be noted. Aircraft use should not be prohibited in the corridor. There are areas within the corridor used by wheel and float planes that do not adversely impact the river or its users. Aircraft use primarily involves hunting and transporting of meat during the fall hunting seasons.

Page 43, Item 3 - Subsistence: In addition to trapping, other subsistence uses should be acknowledged by the plan in a similar fashion.

Page 48, Action 10.1: There should not be complete fire suppression along the river corridor. The modified suppression category effectively meets the fire protection needs of the Gulkana River system. Under this category fires would be subject to initial attack during periods of peak use. Later in the season suppression activities would then cease and fire could be allowed to play its natural role in the ecosystem.

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If fire is kept out of the area entirely the plant communities will all resemble mature types and plant diversity will be lost. Diversity creates openings that support different wildlife species and allows for interesting views and observations. Additionally the corridor is very important moose habitat, and fire is essential in order to maintain the needed browse species.

Page 51, Action.1: We would note that the section of the utility corridor which is also in the river corridor is a valid existing right.

Has the Federal Highway Administration (FHWA) been involved with the management plan? In addition to DOT/PF, the FHWA has a statutory responsibility for federal-aid highways which is what the Denali and Richardson are designated. It would certainly seem appropriate that coordination exist between the two federal agencies to insure that FHWA regulations for highway safety and other standards are carried out.

For your reference, we have attached a copy of a letter from the DOT/PF's Interior Region Deputy Commissioner to BLM containing additional comments.

We appreciate the opportunity to review this plan and thank you for the deadline extension you granted the State for comments. Please contact our office if we can be of any further assistance to you or your staff.

Sincerely,



Sterling Eide  
State CSU Coordinator

by: Tina Cuning  
State CSU Assistant

Attachment

cc: State CSU Contacts  
D. Fish, BLM Glennallen