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FILE: CSU-BLM-UNALAKLEET

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5 April 1983

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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."

Page 13, paragraph 2: The statement "Commercial Fishing is not conducted within the Wild River section" is incorrect. There is a small (1 or 2 man depending on the year) commercial char fishery conducted through the ice in the Unalakleet River. Some of this fishing occurs within the Wild River section. There is a 2,500 pound catch guideline in effect for the char fishery. Catches are highly variable but usually under 300 pounds.

In reference to the salmon fishery, it does not occur in the lower reaches of the river. The river is closed upstream of the mouth to the commercial harvest of salmon.

Page 14, paragraph 2: Some lynx trapping may also occur along the river corridor.

Page 14, paragraphs 1-3: This section should also describe nongame wildlife species such as raptors and other non-game birds (referenced on page 16), endangered species or feral reindeer. It would also be appropriate to include a brief discussion on wildlife population sizes and harvest pressures.

Page 15, paragraph 1: The Plan correctly identifies cultural resources as an area of concern in the wild and scenic river corridor. However, it does not propose any specific management objectives. In order to properly manage this corridor for cultural resources, it is necessary to have a basic comprehensive inventory and a plan to protect and preserve those resources. The State Historic Preservation Officer requests that such a plan be included in your final Management Plan.

The draft mentions, but does not describe, known cultural resources in the area. Plans need to be included in the final Management Plan for protecting, preserving, or interpreting these sites. The Iditarod Trail (a National Historic Trail) is also mentioned, but again no plans have been provided. In general, more attention should be placed on actual planning for identifying, protecting, preserving and interpreting cultural resources.

Page 16, paragraphs 1 & 4: Trapping should be included in the listing of activities along the river.

Page 17, paragraph 2: There is a need for a cross-country ski trail system in a hilly, wooded area for school ski programs near Unalakleet. If any portion of the Unalakleet Wild & Scenic River System meet this criteria, development and maintenance of a trail system should be addressed in the management plan.

Page 18, paragraph 2: The appendix maps indicate some private lands adjoining the river are surrounded by the unit. Has BLM assessed whether any of the landowners use access routes, other than the river, which need to be excluded from the unit?

Page 19, paragraph 5 and Page 21, paragraph 2: See the attached letter from Alaska Department of Natural Resources regarding land status and navigability.

Page 20, paragraph 4: Last sentence is unclear.

Page 22: The management policy for the watershed (Management Framework Plan, SW Planning Area, McGrath) should be included as an appendix. Does this management policy include any limitations on fisheries enhancement, rehabilitation or development?

Page 23, paragraph 1: "It is to remain generally inaccessible except by trail..." Does this mean that aircraft and boat access will not be allowed? These latter modes of transportation are allowed (p. 39 para. 3). Or are they only allowed for use by local people going to inholdings or for subsistence activities? The report gives two conflicting statements. On p. 6 it says "float plane and ski plane access is possible but is restricted to the wider, straighter sections of the lower river." Does the "lower river" mean the area lower than the corridor? Then it states on p. 26, "The only means of access to the Wild River corridor is ...float plane in summer...or airplane in winter." If plane or helicopter access is available to the upper river, the public or state may eventually want to take advantage of this mode of access. Planned and potential access development should be addressed in the management plan rather than at a later date.

Page 23, Objectives: Add; #6. To provide opportunities for the continuation of subsistence and other traditional activities.

Page 24, paragraph 4: "excessive" is misspelled.

Page 26, paragraph 3: "affects" should be "effects."

Page 26 and Page 39, item 3: The description of the Surface Transportation Situation is inaccurate in its statement that, "Roads do not exist in the region and none are expected to be developed in the near future." The Department of Transportation and Public Facilities (DOT&PF) has scheduled for FY85 in the Six-Year Transportation Improvement Program, a route reconnaissance for a 90 mile road from Unalakleet to Kaltag. This project was initiated by a request from the City of Unalakleet. Should it be decided to construct the road, it is likely that it will be necessary to cross the river at a section that has been designated Wild. The River Management Plan should specifically address restriction that new access routes will face.

In addition to the Unalakleet to Kaltag corridor, there are a number of traditional and existing trails that traverse the Unalakleet River. These trails are used to transport people and supplies, and many are fishing and hunting routes. DOT&PF has been requested to improve these trails to raise their standards to a level acceptable for year around use.

Travel on the river itself has traditionally been the primary means of access on and around the Unalakleet River. However, the River Management Plan should not preclude availability of lands that may be used for other modes of local transportation development. Transportation is a major factor in the determination of economic stability in rural areas. Wild and Scenic River management should take this into consideration when placing restrictions on development within the management boundaries.

Page 32, paragraph 3: Report reviewers would have a clearer idea of the "considerations" if examples were given of uses that would not be compatible with Wild & Scenic River designation.

Page 35, paragraph 11.1: The Plan states that inventories will be made prior to any ground disturbing activities. This type of inventory will not produce the comprehensive information necessary for implementing a management plan. Rather, it will result in a hodge-podge or checkerboard of information that will be inadequate for management purposes.

Page 39, paragraph 2: The last sentence should include State and private lands as well as Native allotments.

Page 39, Action 3.1: Use of motorized vehicles for travel is also recognized in ANILCA Sec. 1110(a).

Other forms of motorized access such as the "three wheeler" have become traditional in and on the Unalakleet River. Winter use is particularly widespread and the vehicles are used in subsistence and recreational activities. The prohibition of ATV's should be relaxed to allow "traditional three wheelers." There also have been reports of one of the local residents building a hovercraft. We do not know if he was successful and if so; when, where and for what it was used or if this use would qualify hovercraft as a "traditional means of access."

Page 41, paragraph 4: Some provisions for visitor information, whether in Anchorage or Unalakleet, should be addressed. The public may need some specific maps and suggestions for using the area without harassing the local people. The precaution of developing brochures before "demand warrants" may save litter, trespass and other problems before they arise. It is reasonable that local people do not want publicity but the BLM should publicize the availability of information and brochures at their offices. Perhaps this could be done in one general brochure on all Alaskan Wild and Scenic Rivers.

Page 41, paragraph 5-6: The action and discussion seem to conflict. The "action" states BLM has no control and the "discussion" states the native use must be consistent with the purpose of the Wild & Scenic River designation. If native allotments or State land are in the viewshed, are they managed according to the Management Framework Plan (p.22)?

Page 42, paragraph 4: "Required" misspelled.  
If ADF&G determines that a fishery enhancement, research, or rehabilitation project is necessary, are there any limitations? For example would temporary or permanent structures or camps be allowed?

Page 42: This section is lacking a related discussion on wildlife management. Among other items, BLM should address the issue of reindeer grazing within the river corridor. Unalakleet village and river were once the center of the reindeer industry; we understand that NANA Regional corporation has considered renewing reindeer herding in the area.

Page, 43, paragraph 1: If all of these documents deal with conservation responsibility then the responsibilities of the State and BLM could be clearly listed.

Page 44, item 7: BLM may wish to consider using the local fish and game advisory committee as a contact point for local community input.

Thank you for providing an opportunity for the State to review the management plan. We look forward to assisting you in preparing final management plans for this and other Wild and Scenic Rivers managed by BLM. Please do not hesitate to contact us for any further information or participation by the State agencies.

Sincerely,

Sterling Eide  
State CSU Coordinator

by: Tina Cuning  
State CSU Assistant

cc: C. McVee  
State CSU Contacts