

BILL SHEFFIELD, GOVERNOR

CSU Planning Office
333 Raspberry Road
Anchorage, Alaska 99502

Phone: 267-2202
File: CSU-BLM-Delta
Subject: Draft Management Plan,
Delta River

2 May 1983

Mr. Wayne Bodeu
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 Delta River Management Plan. The State CSU Contacts were complimentary of the plan's content, including presentation of management intent. The following comments are offered to assist your planners in addressing areas of concern identified by 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 Delta 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 identifies placer claims within the Delta corridor, but fails to plot them on the map.

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? Incidentally, restricting aircraft on the river below Tangle Lake is in direct conflict with your objective to preserve valid existing rights.

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.

Page 1 and 9: BLM appears to have internally determined to pursue specific classifications of the Tangle Lakes and Tangle River. Why was "scenic" chosen over "recreational"? Access and use of that area has probably changed since the BOR report.

Public participation and an updated evaluation should be conducted prior to classification determination. Please advise.

Page 7: Regarding discussions on subsistence use:

"The Division of Subsistence" within ADF&G "currently has very limited information regarding resource utilization patterns in or near the proposed Wild and Scenic River corridor. With the exception of berry picking, limited spearing of whitefish, and gathering of firewood," which you discussed, "the Draft River Management Plan implies that other harvesting activities are not for subsistence uses. It is unclear on what basis this determination was made.

"We recommend that the planning team be more specific as to the composition of user groups who reside in or near the proposed Delta Wild and Scenic River corridor. The ADF&G staff in Delta Junction and the Delta Junction Fish and Game Advisory Committee probably would be key sources of information in this regard."

Page 9: Correct paragraph 2 to read "640 acres per river mile."

Page 11: 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 14: BLM states that aircraft landings would compromise the primitive qualities of the river. It should be stated how the primitive qualities would be diminished.

Page 24: Action 1.1 states that off-road vehicles will be limited to certain trails, while the "Discussion" section states that no restriction is necessary on the recreational section of the river. We feel that this particular statement should be included in the "Action" statement itself.

Action 1.2; add to list of exceptions: "Motorized equipment may be used by the State of Alaska for law enforcement and to perform fish and wildlife research and management."

Page 25, Action 2.1: Why isn't aircraft use on the Delta Wild River considered valid existing rights? Aircraft have landed there in the past. Action 2.1 needs to be modified to allow aircraft operation on the water surface, and especially recognize its use for search and rescue operations, fire suppression and law enforcement.

Page 28: Action 6.2 refers to material sources needed for the Richardson Highway; we would add that material sources are also needed for the Denali Highway. The "Discussion" section states the need for realignment of various portions of the highway in the lower corridor. We would add that both the Denali and Richardson Highways have proposed reconstruction projects and replacement of bridges.

Page 32: There should not be complete fire suppression along the river corridor. The modified suppression category affectively meets the fire protection needs of the Delta 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.

Appendix: If navigability has not been determined for even the Tangle Lakes as you state, you should note how the approximate limit of navigability shown in Figure 3c of the Appendix was determined.

We appreciated the opportunity to review this plan and look forward to working with you in the future. Please contact our office if we can be of any assistance to you or your staff.

Sincerely,

Tina Cuning
State CSU Assistant

Attachments

cc: State CSU Contacts