CSU Planning Office 333 Raspberry Road Anchorage, AK 99502

Date:

10 June 1983

Phone:

267-2215

Mr. Wayne Boden

Anchorage District Manager Bureau of Land Management 4700 East 72nd Avenue

Anchorage, AK 99507

File:

CSU-BLM-FORT

Subject:

Fortymile River

Draft Management Plan

Dear Mr. Boden:

State CSU Contacts have completed their review of the Draft River Management Plan for the Fortymile River. Reviewers found the plan to be concise and well-written with excellent maps. Management actions proposed in the plan addressed major State concerns and appear to have been developed in an equitable manner, giving consideration to the diversity of user groups in the area.

The Draft Management Plan acknowledges use of the area by the resident population for subsistence purposes and appears to offer the safeguards necessary for continuation of existing barvest practices. However, little attention is paid to the potential development of an asbestos mining operation by Doyon, Ltd., on Slate Creek, in the North Fork drainage near the River corridor. This project could attract hundreds of reople to the area and perhaps double the present population in the overall Fortymile River-Upper Tanana region. A project of such magnitude involving a material with which many health risks are associated warrants further examination for the impacts it may have on management of the Wild and Scenic River and wildlife resources in the regiou.

It should also be noted that many historical artifacts have been removed from the River corridor in recent years, either by souvenir collectors or the Bureau of Land Management. We would hope that special precautions are taken to ensure that new visitors to the region do not continue this practice, and that those artifacts now in BLM hands are placed on display for all to enjoy. As the site of the first gold rush in Interior Alaska a century ago, the Fortymile Wild and Scenic River has special historical significance and should be seconded the attention and protection it deserves.

The Department of Transportation and Public Facilities is encouraged by Item 1 of the Management Action section. We are particularly pleased with the reference to Revised Statute (RS) 2477 roads and trails in Action 1.4. The Department would look forward to working cooperatively with the Bureau of Land Management and other agencies in determining RS 2477 rights-of-way for administrative purposes. An administrative determination of RS 2477s would aid the planning processes of all agencies involved, and begin to clarify this issue.

Specific comments on the draft are as follows:

- Page 14, paragraph 5: "Eechumstuck" and "Kechumstuk" are both correct spellings; however, there should be consistency within this section.
- Page 33, paragraph 1: ANILCA Sec. 1323(b) is also applicable in your discussion of access.
- Page 65, paragraph 7: It would be helpful to provide a brief overview of 43 CFR 3809 provisions at this point.
- Page 74, Action 8.3: How will RLM manage cabin construction on Scenic and Recreational sections of the river?

We appreciate the opportunity to review this and other management plans for BLM components of the Wild and Scenic River system. Although the above statements reflect our reviewers comments to date, we have been notified that some further comments may be forthcoming after the deadline. We will forward any such comments to you as an addendum to this letter as soon as we receive them.

Sincerely,

Tina Cunning State CSU Assistant

cc: M. Green, BLM

L. Parker, ALUC

R. Foster, CACFA

State CSU Contacts