

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET  
DIVISION OF GOVERNMENTAL COORDINATION

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January 11, 1984<sup>15</sup>

Mr. Roger Contor  
Regional Director  
National Park Service  
2525 Gambell St., Room 107  
Anchorage, AK 99503

Dear Dr. Contor:

The State has completed its review of the draft Environmental Impact Statements (EIS) and Wild and Scenic River (WSR) studies for the Squirrel and Lower Sheenjek Rivers. Although a number of our previous concerns have been addressed in these documents, we find that several significant State concerns remain. Based on these concerns, as noted below, we do not support the proposed Wild River designation on either of these two rivers.

### Lower Sheenjek River

In reviewing correspondence that was sent to the National Park Service (NPS) by the State on April 2, 1982 and October 31, 1983, we find that the State has consistently asserted numerous concerns regarding WSR designation in general and has not supported a Wild River designation of the Lower Sheenjek River. Although we appreciate that this draft EIS addresses many of the questions previously raised, there remain several significant State concerns. These include the effects on the management of the State-owned river bed and the effects of designation on future expansion, improvements or maintenance of transportation systems.

We also reiterate our concern that additional attention drawn to the area will likely result in increased user conflict, eventually resulting in added regulations and restrictions for users of the area (potentially affecting a variety of public uses, including hunting and fishing). This concern has also been reflected in the majority of local public comments who prefer the "No Action" alternative as noted in the summary.

We note that while NPS acknowledges State jurisdiction over the appropriation and reservation of waters for all streams included within the WSR system, there is a need to make explicit that NPS will work with the State regarding water appropriations. The plan should specifically identify the proposed policies and a work plan for securing such instream and out-of-stream reservations necessary to promote the primary purposes of the system. We recommend that the following statement be included in the document:

"The Federal administering agency will work cooperatively with the State of Alaska, Department of Natural Resources, Division of Land and Water Management, to quantify and apply for reservations of minimum flows to support the values for which the river area is designated."

On page 19 of the EIS, the NPS states that land use in the area is "occasional and intermittent." We request that this language be clarified due to the different connotations for subsistence versus other land uses; "occasional and intermittent" uses of an area for subsistence purposes should not be inferred to mean that an area is relatively less important than others. It may be very important one year or part of the year and less the next depending upon a variety of factors. The NPS should be aware of the following additional references which address relevant information on land uses in the area by local residents to better evaluate contemporary resource use patterns in and near the river corridor. Subsistence Land Use in Upper Yukon-Porcupine Communities by Richard Caulfield (ADF&G Division of Subsistence Technical Paper No. 16, June 1983) and Hunters of the Northern Forest by Richard K. Nelson (University of Chicago Press, 1973). We note that the Caulfield report was recommended to the NPS as a resource reference in a June 14, 1984 response from Terry Haynes to Roger Contor on a Section 810 Evaluation. The NPS was also alerted to the Nelson book and several other references in an April 2, 1982 letter from Sterling Eide to Jim Morris, which referred to the historical importance of the lower Sheenjek River to Arctic Village residents.

The Cultural Values section of this draft EIS states that there are no sites in the corridor eligible for the National Register "...possibly due to the absence of significant survey (pg. 28)." It should, in reality, state that the absence of such eligible sites is probably and/or most likely the result of insufficient survey. This suggestion constitutes a substantial shift in meaning and better reflects the current state of knowledge about the study area. This revision would be more consistent with some statements made in the section such as:

1. "The Sheenjek River served as a major north-south route for travel and trade between Athabaskans and Eskimos."

- 09 2. "Some of the highlights...the establishment of a major trading post at Fort Yukon...the growth of the fur trade until Fort Yukon became the company's most valuable post west of the Rock Mountains...; gold prospecting in the late 1800's; and the temporary resurgence of fur trapping in the area in the 1920's.

These statements imply that the area was quite important to both the prehistoric and historic component. It is, therefore, probable that the lack of sites known to be eligible for the National Register is caused by the lack of sufficient information. The conclusion stated on page 39 that "no appreciable change in the condition of sites would be expected" is, perhaps, a little premature and too broad given the lack of data on sites in the study area. Another statement made on page 39 also poses some questions. What is the supporting documentation for the statement "Surviving archaeological sites are probably far enough off the river...? One would expect sites associated with the gold mining exploration as well as with the fur trade to be found both on and off the river. Sites associated with the Sheenjek River as a major north-south trade and travel route would be expected to be found on the river as well.

#### Squirrel River

We appreciate that many of the State's previous concerns have been addressed. However, some concerns noted above for Lower Sheenjek also apply to the Squirrel. In particular, we are concerned about the lack of consideration for increased user conflicts that will likely occur with designation and with the accompanying additional restrictions on potential transportation corridor development which a Wild River designation would impose.

The Environmental Consequences section (p. 56) of the draft EIS addresses "Impact on Future Development of Transportation or Utility Corridors" and identifies the possibility of transportation access to the Ambler Mining District via a crossing of the lower Squirrel River. Designation would result in restriction of a transportation and/or utility crossing unless no feasible and prudent alternative exists. There are federal lands immediately north and south of the Squirrel River study corridor (i.e. Noatak National Preserve and Selawik National Wildlife Refuge), not referenced in the discussion, that already restrict transportation access. A crossing of the lower Squirrel River is, therefore, probable to provide access to the Ambler mining district. This needs to be so stated in the document.

The document also needs to be expanded to address instream and out-of-stream water reservations. (See comments for Lower Sheenjek). We also request that the document acknowledge that there is a lack of agreement about the navigability status of the Squirrel River. The State believes that the river is

navigable under federal criteria to North Fork, rather than only to the Omar River as stated in the study. Under State criteria, the State believes that all but 6 to 10 miles of the river are navigable, since motorboats go above the Omar River to Native allotments.

The map depicting "Potential Influences" (p. 44) is misleading in that it does not clearly show which portion of the Squirrel River is likely to be affected by a transportation corridor. It is impossible to get an idea from this map how the proposed corridor might relate to the preferred alternative proposed by the National Park Service.

The land ownership map (p. 27) should show the exterior boundaries of the conservation system units.

The Division of Governmental Coordination has also completed the coastal consistency review of these draft EIS' and wild and scenic river studies. Based on our review, the Division agrees with the NPS' determination that the proposals in these documents are consistent with the Alaska Coastal Management Program.

Thank you for the opportunity to review these documents. If we can be of any assistance in clarifying these comments, please feel free to call this office.

Sincerely,

Robert L. Grogan  
Associate Director



By: Sally Gibert  
State CSU Coordinator

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