

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES OFFICE OF PROJECT MANAGEMENT/PERMITTING

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November 4, 2003

Bruce Rogers
Land Use Planner/Environmental Coordinator
Glennallen Field Office
P.O. Box 147
Glennallen, Alaska 99588

Dear Mr. Rogers

RE: Environmental Assessment for Revision of the 1983 Gulkana River Management Plan

The State of Alaska has reviewed the internal review draft "Environmental Assessment for Revision of the 1983 Gulkana River Management Plan." We appreciate the opportunity to review this draft and BLM's commitment to involve state agencies as partners in addressing issues affecting management of the Gulkana River and the adjacent upland corridor. The opportunity for the state to provide resource and public use data, participate in evaluations of the Bureau's data collection and management decisions, and to discuss impacts of the Bureau's management alternatives on state management prior to completing a draft will help assure accurate information is available to the public during the formal review period. While concerns remain that we hope will be resolved prior to publication, cooperative efforts to date have contributed to a significantly improved document and improved coordination between the agencies.

GENERAL COMMENT

Special Use Land Designation

We are pleased to see that the EA references the State's Special Use Land Designation (SULD) and clarifies that some management actions are contingent upon adoption of the SULD by the state. The Draft Proposed SULD was developed as a parallel document to provide consistent management actions for state lands adjacent to the Gulkana River corridor. The Alaska Department of Natural Resources (DNR) intends to provide the SULD for public review and comment in conjunction with the release of the EA for public review.

Key management actions identified in the EA should be consistent with the state adoption of the SULD. While the actions contained in the EA are representative of what has been discussed previously (with some exceptions), BLM should be aware that the SULD is subject to change through internal review and through the public process.

Given the level of public confusion about jurisdiction of the river following earlier public meetings, we request changes be made to the EA to further distinguish proposed actions within the jurisdiction of BLM and actions proposed by DNR. We believe the EA can be revised to help clarify authorities

without abandoning the cooperative planning process. Management actions proposed for state lands should be clearly identified while the EA focuses more closely on the actions the Bureau is proposing for federal lands, along with an explanation of how those actions are expected to dovetail with possible state actions.

SPECIFIC ISSUES

Action Common to All Alternatives

BLM should include a section in the text that includes Bureau management actions that will be implemented regardless of monitoring, standards, or river segments.

Clarification of Authorities

Similar to the discussion on authorities above, the EA should clarify that the Bureau's proposed management actions are for the corridor (uplands) although we recognize that these actions vary by river segment because of the types of uses occurring on the adjacent state-owned river and shorelands. EA text should note that while monitoring occurs on both BLM administered uplands and State shorelands, some management actions associated with site impacts are only applicable to upland sites. Shoreland sites are typically free of large vegetation, consist of sandy or rocky soils which do not compact easily, and are frequently "swept clean" of evidence of past human use after spring breakup or high water flow events. A brief section could be added to the EA text outlining the need for a Cooperative Management Agreement between the agencies.

Impacts at Upland Sites

For the "heavy impact sites," hardened campsites or tent platforms may be appropriate to direct use and help discourage development of satellite sites because the overused sites have rocks, roots, poor drainage, charcoal in the soil or some other factor which hardening or tent platforms may resolve.

Human Waste

Our January 9, 2003, letter contained certain of recommendations that were not addressed (see EA page 27). We request reconsideration of our recommendation for "*regular enforcement [of] state waste standards and increasing the monitoring period from one year to two consecutive years before measuring against the standard.*" This would give the education component time to take effect before implementing, if necessary, the management action proposed for various river segments. We advised "*education and enforcement of current laws may go a long way to bringing the current situation into the identified standards for acceptability.*" We also recommended "*placement of additional outhouses*" in areas where standards are constantly being exceeded and "*frequent monitoring and maintenance of these facilities*" to alleviate concerns with waste disposal in those areas.

We look forward to meeting with BLM staff to further discuss these recommendations.

Camp Encounters (Limits on Group Size and Mandatory Registration System)

As previously discussed with the Bureau, this proposed management action tends to mischaracterize the trip registration requirement as a scheduling system for camp encounters when it actually is a permit (tag) system for which registration is required to obtain the tag. If registration is required and is based on launching, those users who do not register and are not in possession of the tag would be in violation. The State views this as a restriction (closure) of public activities within a CSU addressed in ANILCA Sec. 1110 (a) and 43 CFR 36.11.

We recommend implementation of a voluntary registration system, instead of the mandatory registration in Phase I management action for the various segments. Such a program would provide users with the opportunity to “self regulate” before more restrictive measures are considered (such as mandatory registration or permits). Implementing a voluntary registration program would also be a good test to determine if such a system could be successfully applied to other rivers in the state. With the wide use of the internet and cell phones, a voluntary system has a higher chance of success than just a few years ago. If such a system does not achieve standards outlined in the EA, then the state will consider supporting a mandatory registration or permit system for launches. This initially could include a registration system only for floaters (since they are more sensitive to crowding on the upper reaches) but no registration system for launches from Sourdough. Our hesitation to support BLM’s mandatory registration/permit system under Phase I or II is also based on DNR’s concerns about implementing a mandatory registration or permit system through an SULD. It’s difficult to state at this time whether or not at some time in the future DNR could enter into a parallel mandatory registration or permit program with BLM or whether it would be solely a BLM program. If BLM requires a permit/registration as part of Phase II, hopefully it would be contingent on DNR’s concurrence and additional public process.

Several of the proposed actions include limits to river users based on the number of available campsites or the ability of existing campsites to accommodate larger groups. These actions propose to limit use of BLM upland campsites within the Gulkana corridor. Such limits could result in campers “spilling over” onto state shorelands. DNR would like to discuss including a recommendation in the SULD and EA calling for a cooperative management agreement between the two agencies that would assist in implementing the two plans. An agreement could address management strategies for addressing increased use of campsites on both BLM uplands and State shorelands under existing management as well as under Phase I and Phase II (if and when they are implemented).

While there may be congestion during brief periods of the fish runs at some preferred camping locations, experience and survey data indicate that alternate camping locations are preferred over a complicated registration system. We wonder if the costs of either a voluntary or mandatory registration system are justified for such short seasonal high use periods. Damage to the upland resources and experiences of the campers might be better addressed through identification of locations suitable for camping through brochures, GPS information, and signage.

As stated in our earlier comments on the proposed action, the indicator “*Percent of nights on river within sight and sound of other campers*” is a qualitative assessment that must have established measurement protocols to ensure data are collected and interpreted in an unambiguous manner. This monitoring condition should have clearly defined criteria of distances for camping within sight or sound of another user that can be duplicated and reproduced in most circumstances. An example of these criteria would be “sights or sounds within ¼ mile of your campsite.”

Fire Rings

We appreciate the Service’s desire to address physical and social impacts associated with camping within the Wild River corridor. However, Phase II management should allow for placement of BLM-constructed fire rings at some upland sites where 1) use is occurring regularly, 2) the sites are heavily impacted, and 3) the placement of rings at such sites is not likely to impact the aesthetics of the site (since the site is already heavily impacted). Potential sites include the outlet of Paxson Lake, confluence of the Middle and West Forks with the main stem, and below canyon rapids. The

establishment of permanent fire rings (as opposed to user-developed rock fire rings) and hardened tent sites may encourage consistent ethical use of these sites.

We look forward to meeting with BLM staff to further discuss educational strategies aimed at protecting campsites from further degradation.

Please email or call Don Perrin at 269-7476 if you have questions regarding these comments.

Sincerely,

Sally Gibert
State ANILCA Coordinator

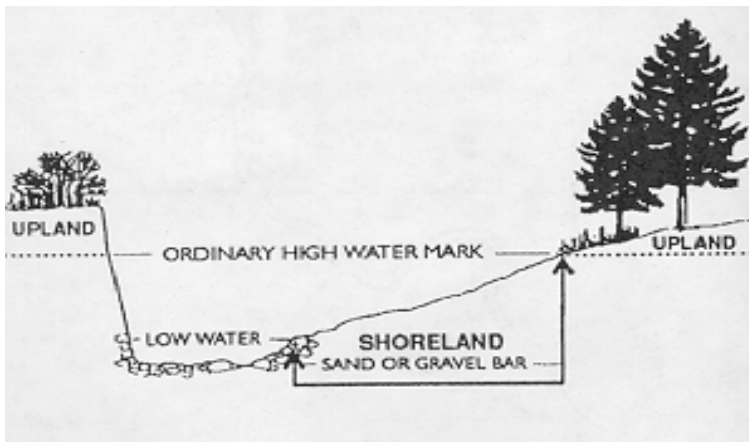
cc: Tina Cuning, ADF&G
George Weekley, ADF&G
John Westlund, ADF&G
Brandon Ducsay, DNR
Bruce Talbot, DNR
Odin Brudie, DCED
Thomas Chapple, DEC
David R Eberle, ADOT/PF

PAGE SPECIFIC COMMENTS AND SUGGESTED EDITS

Corridor definition

We applaud BLM for using the correct terminology throughout most of the text. However, there are several sections where the public may be confused about who manages the river.¹ The document needs to be clear throughout that BLM manages the river corridor which only includes the uplands. We suggest minor editing to clarify this point, not a complete revision of the EA. It would also be helpful if BLM includes a definition of the term “corridor,” such as, “Under ANILCA, Wild and Scenic River corridors in Alaska include an average of not more than 640 acres per mile on both sides of the river and do not include any lands owned by the state, or private lands, including navigable waterways below ordinary high water mark.”

Such a definition would be helpful in the first few pages of text in the EA (such as on Pages 3-4, D. Scope of Analysis) to clarify the fact that the term refers to the uplands which are mostly BLM owned on the upper river and Ahtna owned on the lower river. Also, a cross-section schematic of the corridor and river should be included early in the EA that portrays “corridor,” “uplands,” “shorelands,” “water,” and “ordinary high water.” This diagram is used in all state management and area plans and has helped reduce public misunderstandings about these terms.



Page 2, B: Please include action taken by the Alaska Land Use Council to provide guidelines for management of Wild and Scenic Rivers under ANILCA in Alaska and the adoption of the Memorandum of Understanding for cooperative management of the corridor in 1985. (The latter is mentioned on page 16.) These are significant actions that contribute to the present situation.

Page 3, paragraph 1: Delete “*excellent*” in last sentence. See earlier state correspondence regarding the survey and its analysis.

Page 3, C, paragraph 3: The statement “*there is a strong need . . . to address increased visitor use,*” should be supported with factual information concerning numbers and types of visitor use.

In addition, we suggest use of the term “*quality*” should only be used in concert with a definition or criteria; no land manager intends to manage for “poor” or “low” quality. We further suggest that if

¹ One example includes the first sentence of the third paragraph on page 2.

the Bureau intends to manage for a specific range of social experiences, those need to be identified. In turn, many users may not like some specific experience but if asked, would rather accept the experience over management restrictions. Others who are seeking a more remote experience will voluntarily go elsewhere, especially during the height of the season.

Page 5, c., bullet 5: This objective, or an additional objective might recognize “Accurate monitoring of fish escapement” (e.g. the fish counting tower) as an objective.

Page 5, e: This objective recognizes the variety of waters the Gulkana offers to floaters and powerboaters but barely mentions other recreation values. The recreation values should be broadened and read something like, “The Gulkana provides a variety of recreation values. The corridor provides a remote setting for recreation activities such as boating, fishing, hunting, trapping, camping, hiking, snowmachining, skiing, photography, and wildlife viewing.” It would be difficult to make the list all-inclusive therefore the “such as” preface. Alternately, harvest-related values could be listed separately from the recreation values and include activities such as hunting, fishing, trapping, berry picking and subsistence?).

Page 6, carryover paragraph: The description of scenery extends well-beyond the river corridor. Based on this we recommend the first listed management objective be revised to read, “Management activities will retain the existing character of the landscape within the river corridor.”

Pg. 6, 2. Proposed Action Part 2: Change “*The State of Alaska*” to “*Alaska Department of Natural Resources*” to match the acronym “(DNR)”.

It would be helpful to include a table defining the different experiences from primitive to social before describing each section of the river corridor. This is discussed generally in each section but would be helpful to have the definition and comparison early on.

Page 6, a. Upper River: Rephrase canyon segments to state, “Included in this segment is the Canyon Rapids area (1/2 mile segment), which will be managed to provide a semi-developed (replaces “undeveloped”) recreation experience...” Should state that the remainder of the upper river segment will be “undeveloped.” This change recognizes that outhouses, improvements to the portage trail, and hardened sites are compatible in this ½ mile portion of the river segment. It would be helpful to include a table in the EA that provides the public with a general idea of management intent for river segments. An example of this table can be seen in the Susitna Basin Recreation Rivers Management Plan (1991), page 3-3. The addition of “nodes” of higher use management will allow agencies to better address problems associated with a few sites within the mostly “primitive” setting of the upper river.

Pg. 6 and under all segments - aa. Litter: A specific definition and standard of a “site” is needed beyond a general area of use. If the clean up crew finds a piece of garbage 50 feet from a campsite, is that considered litter for that site or a separate site? A set distance from the site should be used for consistency.

Pg. 6 and under all segments for Monitoring: All monitoring sections for each issue should include a rationale for all management action phases.

Page 8, ee, Camp Encounters (during King season, 6-1 – 7-20): Management Actions, Phase I, proposes regulations that would ban use of chainsaws in all segments of the corridor: Does this

include firewood gathering for subsistence? The 1983 Gulkana management plan allows subsistence collection for firewood and house logs. Please elaborate on the effects of any proposed regulations in the upcoming ANILCA 810 analysis.

Pages 8-9 and 14, gg. Powerboat Encounters: In the indicator section, the term “*encounters*” needs definition; e.g., what does the “number of encounters” mean, does it include sound encounters or sight? at what distance?

Under Management Actions (Phase I), it is unclear whether motorized kickers would be allowed during the 5-15 to 8-15 proposed closure. We suggest: *Motorized “kickers” would be allowed to get across Paxson Lake, but their use would not be authorized on the remaining portions of the segment during the 5-15 to 8-15 closure.*

Page 9, first bullet: Change one sentence to: “Work with DNR to determine which existing stream crossings are currently permitted under AS 41.14.870.” As a result of Executive Order 107 which took effect 4/15/03, the Fairbanks DNR Office of Habitat Management and Permitting now maintains these files and is responsible for issuing general permits to the public for stream crossings under AS 41.14.870.

Page 10, ee. Camp Sharing: The standard for the management indicator is unclear. It only mentions that the standard is 0.5. Is this the number of nights sharing a campsite with another group? Is the standard a percentage or is it saying that the standard is half of the groups sharing a campsite?

Limiting access to the river by limiting parking does not address the concerns of camp sharing. This action only limits the number of users in the Sourdough segment and does not consider whether the users are camping in the corridor. In addition, Phase III is unclear how the permits will be distributed. Are these permits for boat launching on the segment or do you have to apply for a permit to camp at a certain area?

Additionally, we question why the regulations for the use of chainsaws and recreational shooting aren't the same as for other segments. The Sourdough segment has more users than the others so presumably recreational shooting is more dangerous. Concerns about the rate of consumption of scarce dead and down firewood supplies near campsites would also be greater. In addition, we recommend that the draft EA not base the proposed regulations on recreational shooting and chainsaws on camp sharing/encounter standards being exceeded (although there is a noise component to these two issues), but rather be based on safety concerns (recreational shooting) and resource concerns (scarcity of firewood). Furthermore, these proposed restrictions would be implemented as an action common to all alternatives, not wait for implementation under Phase I. This change would make the draft EA and SULD consistent on these two issues.

Pg. 11. aa. Litter, Indicator: This section did not have the number of sites listed, but on page 27 lists 10-15 sites for this segment. An actual number of sites is helpful to determine what the standards will impact.

Pg. 11. bb. Human waste: There is no monitoring section under this component that addresses a timeline or condition for monitoring. Who is conducting the monitoring for this issue and what is the timeline for when the management actions would kick in, i.e. if the standard were exceeded for two years?

Page 11, gg. Fishing competition and limits on guides: There are concerns that efforts to manage guided use may unnecessarily restrict only fishing guides. When the Bureau instituted the recently expired moratorium on guide permits, it was for all guides including eco-tourism, canoe/kayak guides, etc. We understand that fishing guides and fishing pressure are the Bureau's focus, but if (?) all use on the river has increased since 1983, all guided use needs to be addressed.

Page 11, bulleted item under gg.: Quality is a subjective term that is undefined. Consider revising language to, "...that measure the level of satisfaction of commercial and non-commercial anglers."

Page 12, ee. Camp Encounters: Implementation of mandatory registration for float trips is excessive as the first management action. The Middle Fork has low use numbers, and requiring mandatory registration may lower those numbers further. Additionally, there is little difference between Phase I and Phase II. Voluntary registration of the Middle Fork (and other segments that use the Middle Fork management actions) for the first phase is less intrusive and may achieve the desired conditions for the segment.

Page 13, first paragraph under d.: Consider changing text to read, "The Upper West Fork segment is 109 miles long and includes both the North and South branches of the West Fork of the Gulkana, *however*; only a portion of the South branch of the West Fork is part of the Wild and Scenic River system.

Page 14, third bullet under gg.: "...and certain administrative motorized uses..." could be stated more clearly as "*The operation of powerboats in non-motorized areas is allowed by State and Federal government agencies for the purposes of law enforcement, emergency search and rescue, medical evacuations, fire suppression, or for fish, game, recreation and natural resource management.*"

Page 14, bb. Human Waste, Management Actions, Phase I: As mentioned on other segments of the river, education of the users on human waste disposal and state law is an important component of the management action. Include education in this management action for consistency with other segments.

Page 15, dd. Site impacts, Management Actions, Phase II: Rationale should be provided that shows how limiting group size will address campsite impacts on a section wide basis. We are concerned this action may unnecessarily restrict use on that section of the river and cause groups to break up, possibly forcing users to camp in areas that aren't hardened or to develop new sites.

Pg. 15. ff. Camp encounters: Please provide a monitoring section under this component.

Page 16, Decision Framework, 2nd paragraph: In addition to "*provides specific guidance*" for management issues specific to Alaska, ANILCA amends the Wild and Scenic Rivers Act.

Page 16, G. ANILCA Section 810 Findings: It is unfortunate that an ANILCA 810 analysis was not included in this internal draft. Some of the proposed management actions may affect subsistence users and a thorough review of this document would be incomplete without an 810 analysis. We would appreciate an opportunity to review and assist in the preparation of this component prior to public release of the EA.

Page 17, Issues, b: “... *natural and primitive character of the Gulkana.*” See our previous comments regarding use of the term “quality”. (Pages 3 and 11)

Page 17, third bullet under b: consider revision similar to that as on pages 3 and 11 stated above.

Page 17, Issues, c: “... *habitat for resident and anadromous fish species.*” The effects of erosion from prescribed burning on fish habitat through sedimentation also should also be discussed.

Page 17, Issues, e: “... *floaters and powerboaters’ ability to experience a diversity of recreational experiences on the Gulkana.*” Under the second bullet, please include anglers and hunters, in addition to floaters, trail users, and powerboaters, as recreation users who access the corridor, or rephrase the bullet to refer to all users who access the river corridor by these means.

Page 19, sections c. and e.: Both of these sections should have a bullet added that states: “No power boat restrictions, except for jetskis.”

Page 20, Sourdough segment, last bullet: The last bullet states that a process described above would remain in place for fishing competition and limits on guides. It is unclear what process will be used. Any restrictions that affect fishing opportunities are under management of the State and need to be cooperatively evaluated and accurately described.

Page 20, fourth bullet under b.: Please remove reference to airboats restrictions in the Sourdough segment. Airboats are a traditional use on the Gulkana River; therefore, they will be addressed the same as motorboats.

Page 22, fifth bullet: The third sentence of this bulleted item should be changed to read, “*Department of Natural Resources (DNR) may consider pursuing a State Wild and Scenic River designation for the river segment added through plan amendments contained in the SUL. A decision to pursue the State Wild and Scenic River designation would be consistent recommendations for river segments in Unit 27C in the CRBAP. Also consistent with the CRBAP, they are suitable for legislative designation as a State Recreation River.*”

While early discussions with BLM included the possibility of the State pursuing a federal designation on the South Branch of the West Fork, Gulkana River, subsequent internal DNR discussions have resulted in the elimination of this proposal. The last sentence of this bulleted item should be removed as the state would no longer consider pursuing the federal designation as a wild river.

Pg. 22 – Comparison of alternatives: It would be helpful to include more of an explanation of how the effectiveness rating was done in the table showing the comparison of alternatives. The values on the table appear to be subjective, considering the alternatives are implemented only if standards are exceeded. Also, to ease the reader’s review, it would be helpful if the table were condensed onto one page.

Page 27, last sentence of the second paragraph in section iii) Human waste: Change to “In 2002, a dump station...”

Page 27, third paragraph of section iii) Human waste: Suggest revising text to, “...education on Leave No Trace camping, *increasing education and enforcement of existing state laws and regulations that deal with human waste*, and alternate means...”

Page 28 continuing to page 29: The following text should be added. “*These management actions are proposed by the State of Alaska in the Public Review Draft of the SULD for the Gulkana River Shorelands and Water.*”

Pg. 33, Fisheries, Resident Fish Populations: 1st paragraph: The last sentence states: “*It has been documented that the average size of the Gulkana grayling has been decreasing over the last 20 years (Stark, in press)*”. There are concerns with the baseline data used in this study. Is the study based upon actual statistically valid data sets? ADF&G studies have not indicated this trend, and they are unfamiliar with the study cited.

Pg. 34 – Chinook Salmon: Include the Middle Fork and mainstem Gulkana as other known spawning areas for chinook salmon.

Pg. 35 – 2nd paragraph before d: Change the first sentence to “*ADF&G sport and commercial fisheries management provides for a minimum spawning escapement of 24,000 chinook salmon to Copper River tributaries.*”

Pg. 36 – paragraph before iv), last sentence: Change last sentence to: “*ADF&G currently has a no fishing regulations on the Middle Fork from Dickey Lake downstream 3 miles to protect spawning steelhead and rainbow trout during the spawning period (April 15-June 14).*”

Page 37, Black Bears: In the first paragraph, please correctly cite the source of the information as “*(ADF&G Wildlife Series Notebook, 1994)*”.

Page 37, Grizzly bears: The correct scientific name is *Ursus arctos*

Page 38, e. Wolves: The Department considers wolves as a furbearer and not a large mammal. We recommend that section e be placed below the furbearers section and renumbered accordingly.

Page 43, section ii): To our knowledge, swans do not nest on the South Branch of the West Fork. If this is true, would increasing use on the West Fork increase adverse effects to swan populations?

Page 45, 52, 56, 57, and 60 (there may be other places it occurs): Replace “scenic quality” with “*scenic resources.*”

Page 52, first partial paragraph: Define “wildlife security area.”

Page 53, Effects of the Proposed Action, Alternative 2, Powerboating: We suggest the following revision: “*This alternative proposes a formalized, seasonal (5-15 – 8-15) motorized closure on the main stem one mile above the confluence with the west fork if monitoring conditions are exceeded*”.

Page 53, section b.; Trails: Anadromous stream crossings would be permitted by the Department of Natural Resources, Office of Habitat Management and Permitting.

Page 55, 58, 59, 60, and 61 - Text should be revised to read "...limitations on motorized use *implemented through the state SULD* and potential..."

Page 55, section d. Cumulative effects...: Should be re-lettered to "e." Additionally, text states that winter recreation would adversely impact wildlife habitat outside of the corridor. We suggest deleting winter recreation from the list, or providing a description of how it adversely impacts wildlife habitat.

Page 56, Effects of the Proposed Action, Alternative 2, Cumulative effects, wildlife habitat: Please provide a definition of "wildlife security areas" and additional information regarding "disturbance of critical habitat areas."

Page 56, Effects on access to recreational or subsistence activities for floaters, powerboaters, and trail users, River: The second paragraph describes who may be restricted by a seasonal closure on the Upper West Fork. The closure would affect subsistence users around Fish Lake. Under Section 811 of ANILCA, rural residents engaged in subsistence uses shall have reasonable access to subsistence resources on public lands. A temporary closure for motorized access on the Upper West Fork will restrict subsistence use in the area, especially during periods of optimum use.

Pg. 50, 54, 58, 61: Any references to potential powerboat use in the Middle Fork via the Swede Lake trail are unrealistic. Powerboat use is physically constrained due to the natural conditions. As stated in the draft EA "*natural barriers exist within the river,*" and the "*narrow channel and typically shallow water*" which would generally preclude motorboat use. This is the same reason why powerboats cannot go down the outlet of Paxson Lake to the lower Middle Fork and upper Main-stem of the Gulkana.

Page 60, last paragraph in section 2. b.: Airboats would not be eliminated under this alternative, nor would restrictions on horsepower be proposed in the SULD. Text should be changed to reflect this accordingly.

Page 61, section b. paragraph: Text refers to "horsepower limits", however, the state would not propose horsepower restrictions through the SULD. Text should be changed to reflect this.

Appendix A. Lower River: Change the first paragraph, second sentence to "*This segment is not within the Wild River corridor.*" Additionally, many of the general concerns that we have for particular proposed actions on the Wild River, also apply to the lower river which we would like to discuss with you further. A revised version of Appendix A is provided which clarifies the role of DNR in management actions proposed for the Lower River.

Appendix A should be consistent with the draft SULD by either cross-referencing it or incorporating some of the draft SULD's management actions into Appendix A. We're willing to help with this. We also recommend that Ahtna review the draft before it's released to the public (since many of the management actions are for their lands).

High use sites: The areas where the public is concentrated (Sailors Pit, Poplar Grove, Richardson Hwy Bridge/ Village of Gulkana) need different management intent (including indicators, standards, and management actions) than the remainder of the river. Appendix A should contain more specific on these areas that recognize their special needs based on the high public use they are receiving and they are the primary access points to the river. Each of the landowners at these four

locations, has different issues and responsibilities at these sites that need to be more clearly described: BLM (17(b) easements), Ahtna (uplands), DNR (shorelands), and DOTPF (Richardson Bridge). The overriding theme for the management actions proposed to be implemented by each of the four landowners should be “close coordination and cooperation,” although it may be premature to spell out in the EA solutions in anything more than general terms.

Human waste: Prior to releasing the EA for public review, we need to talk with DOTPF and DPOR more to determine if their plans for the Richardson Bridge have changed since we talked with them last. The potential facilities at this location would be a welcome addition and would go a long way toward mitigating many of the parking, trash, human waste, and access problems occurring there now. With DOTPF’s concurrence, potential improvements recommended by the EA for the site (in addition to “vault toilets” and a “waste disposal and cleaning system” already mentioned) should be “improved parking, campground, dumpsters and an improved road to the river for launching boats.”

Site impacts: Indicators, standards and management actions for site impacts are primarily directed at Ahtna’s uplands. Currently, Ahtna’s management strategy seems to be posting “no trespassing” signs at all the sites the public is currently using (except for their established campgrounds where they charge fees). We encourage Ahtna to consider using the site impact management actions for the upper river as an alternative to posting all their uplands.

Fishing competition and limits on guides: Additional discussion is needed to better define monitoring, standards and initial management actions for both the lower river and the Sourdough segment.

Appendix C. III. Resource Monitoring, 3. Fish monitoring: Change last sentence to: *“Monitoring of steelhead/rainbow trout is also occurring on the Middle Fork.”* Add the following sentence: *“Sport fish harvest, catch and effort is monitored by ADF&G via the Statewide Harvest Survey.”* Some creel census also occurs.