

# MEMORANDUM

State of Alaska

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TO: Joe Cladouhos  
Division Director  
Environmental Quality Management  
Department of Environmental Conservation

DATE: July 7, 1983  
JUL 11 1983

FILE NO:

TELEPHONE NO:

Alaska Dept. of Fish & Game  
Habitat - Region III  
Stream Reclassification  
Requests: Hammond River  
& Nolan Creek - Wiseman  
Area

FROM: *JB*  
Bruce Baker  
Acting Director  
Habitat Division  
Department of Fish and Game

SUBJECT:

83-1398

The Alaska Department of Fish and Game has reviewed the referenced requests to reclassify tributaries of the Middle Fork Koyukuk River near Wiseman, Alaska.

The Middle Fork Koyukuk River is a major contributor of chum and king salmon to the Yukon River fishery. Both species of salmon spawn in the Middle Fork (MF). Chum salmon spawn in the MF to Coldfoot (Slate Creek) and king salmon have been observed spawning in the MF above its confluence with the Hammond River. The MF is considered to be important to fishes year round and supports other fishes such as Dolly Varden, grayling, sheefish, round whitefish, slimy sculpin, longnose sucker, and likely other species of resident fishes.

## I. Hammond River/Vermont Creek

The Hammond River is known to support grayling and perhaps other resident fish and is a king salmon spawning and rearing stream from its mouth upstream to the vicinity of King Creek.

We object to the requested reclassification of the waters of Vermont Creek and a portion of the Hammond River as industrial because:

1. The Hammond River is a designated anadromous water (AS 16.05.870(a)) and is known to support resident fish. We do not view the drainages as "inconsequential" to the biotic process (18 AAC 70.058(e)).
2. We do not believe the intent of the reclassification process was to reclassify the upstream segments of a drainage to a use that would not afford protection of the most stringent use of water downstream; to do so would not be realistic.

We would not object to reclassification of the requested waters to the standard affording protection to aquatic life (18 AAC 70.020(a)(1)(c)), provided the standard is monitored and enforced.

## II. Nolan Creek, Archibald Creek, Fay Creek, Thompson's Pup, Nutmeg Gulch and Smith Creek

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The Department has no first-hand knowledge of fishery values of the referenced drainages of Wiseman Creek. Nor are we familiar with the values of Wiseman Creek. Our professional judgement that the lower reaches of Wiseman Creek upstream to the canyon above Wiseman should host resident fishes was supported by public testimony at the hearing in Fairbanks on June 14, 1983.

We concur with the testimony provided that residents of Wiseman usually draw their water from the spring located south of Wiseman Creek. We have been advised, however, that residents of "North Wiseman" (north of Wiseman Creek) do obtain their water from Wiseman Creek.

Our focus is again on the area of the watershed downstream from the actual area of proposed reclassification. At the June 14 public meeting a statement was made by ADEC that the quality of water in Wiseman Creek must not be degraded beyond the acceptable standards for drinking water. We do not believe such an expectation is realistic if the requested reclassification is granted. Our major concern, however, is again for the fishery values of the Middle Fork of the Koyukuk River.

Although this request comes closer to being a suitable candidate for classification as industrial than the Hammond or Tolovana River requests, we object to its reclassification as industrial on the basis of affording protection to the entire watershed as elucidated above in our discussion of the Hammond River. Again, our major concern is for the protection of the quality of water in the Middle Fork of the Koyukuk River.

Thank you for this opportunity to comment.

cc: D. Lowery - ADEC  
J. Brossia - ADNR