

STATE OF ALASKA

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March 12, 2001

Gary Candelaria
Superintendent, Wrangell-St. Elias National Park and Preserve
P.O. Box 439
Copper Center, AK 99573

Dear Mr. Candelaria:

The State of Alaska has reviewed the Environmental Assessment (EA) for development of the Crystalline Hills Trail in Wrangell-St. Elias National Park and Preserve. This letter represents the consolidated comments of the State's resource agencies.

The State supports National Park Service (NPS) efforts to expand recreational facilities on parklands in Alaska. This trail will become an important addition to this park's repertoire, and taken together with similar improvements underway in other parks, enhances the ability of the NPS to respond to calls for increased park access in Alaska.

The Crystalline Hills has long been recognized as an area with good wildlife viewing, and the local geography lends itself to trail development. The proposed trail is consistent with the McCarthy Road Scenic Corridor Plan which recommends a Crystalline Hills/Moose Lake Wayside "to enhance visual and physical access into the Crystalline Hills for wildlife viewing and recreational hiking opportunities" in this area. The Scenic Corridor Plan, released in November 1997, was prepared jointly by the NPS, the Alaska Department of Natural Resources and the Alaska Department of Transportation and Public Facilities.

We do have a concern about the EA's minimal discussion of existing activities and possible impacts to these activities from trail development. As you know, the Crystalline Hills area has long been used by sheep hunters. The area is currently open for sheep from August 10 – September 20 by state harvest permit or federal subsistence registration permit. Currently, the environmental consequences section states:

Some sport hunting activities, such as bear baiting stations, could be restricted immediately adjacent to the trail, limiting some visitor activities in the area. Access in

general for hunters on foot would be slightly improved by this new access point. Users who currently hike or hunt in the area would encounter other users if they used the trail.

Further, under the Impacts of Alternative Matrix, “additional harvest of grouse, moose, sheep, and or bear may be anticipated due to increased access,” yet the matrix indicates there would be no impact to subsistence. For future reference, the EA should have provided more specific information about past and current use of the area by sheep hunters and anticipated impacts on future use. If you have not already done so, we suggest these topics be discussed with the area Wildlife Division staff prior to issuing a Finding of No Significant Impact (FONSI).

The EA also appears to have left out discussion of possible impacts from avalanches or other geologic hazards. We suggest geologic hazards be assessed prior to issuing the FONSI given the presence of steep slopes above the trail. There is bench above the proposed trail route that may substantially protect the trail from avalanche impact, but an evaluation is needed.

Thank you for the opportunity to comment. Please contact me if you have questions.

Sincerely,

/SS/

Sally Gibert
State CSU Coordinator

cc: John Katz, Governor's Office, Washington, D.C.
Pat Galvin, Director, Division of Governmental Coordination
Pat Pourchot, Commissioner, Department of Natural Resources
Frank Rue, Commissioner, Department of Fish and Game
Joseph Perkins, Commissioner, Department of Transportation and Public Facilities
Deborah Sedwick, Commissioner, Dept of Commerce and Economic Development