

STATE OF ALASKA

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Steve Hunt
Environmental Protection Specialist
Wrangell-St. Elias National Park and Preserve
P.O. Box 439
Copper Center, AK 99573

Dear Mr. Hunt:

The State of Alaska has reviewed the Environmental Assessment for the expansion and improvement of an existing National Park Service campground at Mile 27.8 on the Nabesna Road on the north side of the Wrangell-St. Elias National Park and Preserve. This letter represents the consolidated views of the State's resource agencies.

General Comments

Expansion and improvement of the Twin Lakes Campground has the potential to increase fishing pressure at Twin Lakes and Jack Lake. Angling effort at Twin Lakes and Jack Lake is currently low due to limited access. With improved facilities and access, however, it is likely that angling effort will increase. Several species at Twin Lakes and Jack Lake, such as Lake trout and burbot, are susceptible to fishing pressure. The decision document should consider that such increased pressure would likely lead the Alaska Department of Fish and Game and the Board of Fisheries to revise the regulations for those species to reduce take.

Page Specific Comments

Page 1-6, Subsistence Resources.

This section presents some information about occupancy and past use of the Twin Lakes – Jack Lake area for subsistence uses by one local family, but defers discussion of current subsistence uses to the ANILCA Section 810 Analysis. The presentation is confusing, as it mixes a discussion of current occupancy of the campground with a description of past uses of the area. It also states that because ANILCA provides for the continued opportunity for local rural residents to conduct subsistence activities in the park and preserve, the proposed action “should have no adverse impacts on the site as an ethnographic resource.” We cannot ascertain what constitutes an “ethnographic resource” in this context and what its connection might be to subsistence uses. The second paragraph further confuses the discussion by noting that rehabilitation and expansion of the campground is said to be a potential restriction to subsistence activities, which contradicts the conclusion made later in the Section 810 analysis. We request the Service revise the documentation to clarify these points.

Appendix A, ANILCA Section 810(a) Summary Evaluation and Findings.

The Section 810 analysis of subsistence uses and potential is weak, appears to be contradictory, and does not make a convincing case that subsistence uses will not be impacted. We request the Service revise the Section 810 analysis to properly reflect subsistence impacts.

Contemporary subsistence activities in the vicinity of the Twin Lakes campground are described in general terms on pages A-5 and A-6, with no distinction between activities occurring in the park (open only to local rural residents in the park resident zone under the federal subsistence regulations) and in the preserve (open to harvest under the state regulations). The analysis on page A-7 indicates that increased public use of the existing campground led the local family that had traditionally used the area for subsistence purposes to stop using that area. It is unclear if the family stopped using only the campground site or the surrounding area as well. However, the Service states that a project that will improve and expand the campground, which presumably will attract visitors in the summer and hunters in the fall, is not expected to increase competition for subsistence resources. This assertion seems to contradict what the local family already has experienced. The analysis does correctly acknowledge that completing construction activities outside of the hunting season could minimize impacts to subsistence hunting. However, nothing is said about the potential for increasing public use of the improved and expanded campground facilities during the fall hunting season, which could increase competition in the preserve and impact local subsistence users. The analysis should address this issue.

Thank you for your consideration of these comments. If you have any questions please contact me at 907-269-7477.

Sincerely,

/ss/

Sally Gibert
ANILCA Program Coordinator