

# STATE OF ALASKA

## **ANILCA IMPLEMENTATION PROGRAM** **Office of Project Management and Permitting**

**SEAN PARNELL, Governor**

550 W. 7<sup>TH</sup> AVENUE, SUITE 1430  
ANCHORAGE, ALASKA 99501  
PH: (907) 269-7529 / FAX: (907) 334-2509  
[susan.magee@alaska.gov](mailto:susan.magee@alaska.gov)

July 12, 2010

Glen Yankus, Environmental Protection Specialist  
National Park Service, Alaska Region  
240 West 5<sup>th</sup> Avenue  
Anchorage, AK 909501

Dear Mr. Yankus:

The State of Alaska reviewed the Environmental Assessment (EA) addressing the proposed expansion of the remote automated weather station network in the Arctic Alaska Inventory and Monitoring Network, which consists of Gates of the Arctic National Park and Preserve (GAAR), Noatak National Preserve (NOAT), Kobuk Valley National Park (KOVA), Cape Krusenstern National Monument (CAKR) and Bering Land Bridge National Preserve (BELA). The following consolidated state agency comments cover Alaska National Interest Lands Conservation Act (ANILCA)-related issues and other state interests, excluding coastal zone management, which will be addressed, as applicable, by the Alaska Department of Natural Resources, Division of Coastal and Ocean Management.

The State supports the proposal to establish additional network stations to facilitate collection of climatological data and appreciates the discussion in the EA of the associated benefits to researchers and the Park Service, as well as the potential to participate or contribute to other climate monitoring and modeling efforts. For example, the data would potentially be beneficial to ongoing monitoring conducted by the Alaska Department of Natural Resources, Northern Regional Office, in which snow depth, soil and air temperature data are used to make decisions regarding winter off-road travel by heavy equipment on state lands. Currently, these decisions are largely based on data gathered from state monitoring stations located along the road system. Supplemental data from remote weather stations would likely be useful in determining appropriate resource protection measures. While real-time data access appears limited, historic data would still be beneficial for comparison purposes.

The EA indicates soil sensors would be placed in the ground at 10 cm and 40 cm (page 21). To generate data comparable with existing State and Bureau of Land Management monitoring programs, we recommend monitoring to a depth of 30 cm, either additionally or as an alternative to 40 cm. In addition, since wind scouring can affect snow depths and soil temperature readings, we recommend weather stations be located on flat terrain or broad valleys, rather than on exposed ridges.

We appreciate that proposed installation and maintenance activities “*would be timed to avoid sensitive periods, such as nesting season, or caribou migration or subsistence activities involving wildlife.*” (page 27) The Alaska Department of Fish and Game is available to assist with identifying specific avoidance timeframes and locations.

Although we do not expect the outcome of the EA to be affected by the following page-specific clarifications, they are included for the Service’s consideration for future EAs or other documents where such information would be relevant. We are copying Joan Darnell to ensure that authors of other environmental documents have the benefit of these comments.

Page 4, 1.3.1 GAAR Purposes, last sentence: Since ANILCA Section 803 refers to customary and traditional subsistence uses in the definition of subsistence, we recommend revising future references to “traditional” in this context to “customary and traditional.” This change would also avoid confusion with use of the term “traditional” in the context of Section 811(b). If the GAAR narrative is used in other environmental compliance documents, the following revision would address this comment:

*Customary and traditional Subsistence uses by local residents shall be permitted in the park, ~~where such uses are traditional,~~ in accordance with the provisions of title VIII of ANILCA.*

Alternatively, if the phrase “*where such uses are traditional*” is retained, we recommend the following revision to provide the appropriate regulatory context:

*Subsistence uses by local residents shall be permitted in the park, where such uses are traditional, in accordance with 36 CFR 13. 410 ~~the provisions of title VIII of ANILCA.~~*

Page 65, Wildlife, Cumulative Impacts, first paragraph: The last two sentences, quoted below, over-generalize the cumulative impacts of hunting and will be viewed by many as unnecessarily inflammatory.

*“Subsistence and sport hunting also contribute to the disturbance, and destruction, of wildlife. These actions have resulted in long and short-term habitat loss, displacement of wildlife, and increased human-wildlife conflicts.”*

We recommend against including similar unsupported statements in future documents.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,



Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator  
Joan Darnell, NPS Environmental Compliance, Alaska Region  
George Helfrich, Superintendent, Western Arctic Parklands  
Greg Dudgeon, Superintendent, Gates of the Arctic NPP  
Jeanette Pomrenke, Superintendent, Bering Land Bridge NP