

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM OFFICE OF PROJECT MANAGEMENT AND PERMITTING

SEAN PARNELL, Governor

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September 1, 2011

Mr. Joel L. Hard, Superintendent
Lake Clark National Park and Preserve
National Park Service
Alaska Regional Office
240 W. 5th Avenue, Suite 236
Anchorage, AK 99501

Dear Mr. Hard,

The State of Alaska reviewed the Notice of Intent to prepare an Environmental Impact Statement (EIS) for a General Management Plan (GMP) Amendment/Wilderness Study for Lake Clark National Park and Preserve. We appreciate the Service's efforts to meet with the State during the initial phase of the planning process. The following comments represent the consolidated views of the State's resource agencies.

Wilderness Recommendations

The State strongly opposes including a wilderness review in this planning process. The review of lands not already designated in the Park and Preserve, pursuant to ANILCA Section 1317(a), was completed in 1986 and the conclusion to not recommend additional wilderness remains valid. The State does not support recommending additional wilderness in Lake Clark National Park and Preserve.

Wild Rivers

We are aware the Service is proposing to identify outstandingly remarkable values (ORVs) in the Park and Preserve's three designated wild rivers. Since ORVs will be used as the basis for future management direction, it is essential they meet the high standards defined by the Interagency Wild and Scenic Rivers Coordinating Council. According to Council direction, in order for a value to be identified as an outstandingly remarkable value, it must be:

- 1) river-related, and
- 2) a rare, unique, or exemplary feature that is significant at a comparative regional or national scale

We request the Service make the supporting materials, which clearly document how new proposed ORVs meet these criteria, available for public review.

In addition, we support the original GMP's direction to only impose management prescriptions on the public "*when voluntary cooperation among river users is not sufficient to prevent degradation of the riverine ecosystems, their pristine appearance, or the quality of the wild river experience.*"

Local Access

We appreciate the steps already taken by the Service in responding to the needs of local residents by authorizing subsistence, recreational, and in-holder access within the Park and Preserve. We request the planning process identify and take into consideration other areas where further action may be needed to address local access issues. We further request the plan recognize the Service's commitment to addressing the future needs of local residents, consistent with ANILCA and other relevant laws and regulations.

Visitor Access and Park Use

National Parks are important economic drivers for local communities, and we encourage the Service use this planning process to consider how improved access to the Park and Preserve can responsibly accommodate visitor use. Access to the Park and Preserve is primarily by small aircraft, and we support the vital role that commercial air transporters play in providing the vast majority of public access. When addressing management concerns, we request the Service first use the least restrictive management tool to minimize the effects on visitors while protecting park resources.

Cabins

We commend the Service for restoring three historic cabins this past year and request the plan consider the restoration of other cabins within the Park and Preserve. The original 1982 GMP inventoried 149 cabins. We recommend the revised GMP include the current status of these cabins and address any related management issues.

Continued Cooperation

We appreciate the Service's continued cooperation and coordination with regard to our mutual responsibilities of conserving wildlife and their habitats, and request the revised GMP reference the Master Memorandum of Understanding between the Alaska Department of Fish and Game (ADF&G) and the Service to acknowledge this cooperative relationship.

As intended by Section 1301(d)(2) of ANILCA, the State is available to serve as an active participant in the development of the revised GMP and looks forward to working with the Service throughout this planning process to develop cooperative monitoring and inventory projects that will help to fulfill our respective responsibilities.

Thank you for your consideration of these comments. If you have questions, please contact me at (907) 334-2563.

Sincerely,



Nina Brudie
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator