



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

## ANILCA Implementation Program

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March 26, 2014

Margaret L. Goodro, Superintendent  
Lake Clark National Park and Preserve  
240 W. 5<sup>th</sup> Avenue, Suite 236  
Anchorage, AK 99501

Dear Ms. Goodro:

The State of Alaska reviewed the Draft General Management Plan Amendment (Plan) and Environmental Assessment (EA) for the Lake Clark National Park and Preserve (LACL). The following comments represent the consolidated views of the State's resource agencies.

The State is generally supportive of the Service's intent as represented in the Alternative B, the Preferred Alternative, to provide increased opportunities for recreational activities within the Park and Preserve. We support the recognition and inclusion of commercial services and visitor facilities such as designated public use cabins, trails, and boat storage. We also support the Plan's intent to minimize negative bear-human encounters, using efforts such as the placement of a bear-resistant outhouse and storage facility at Silver Salmon Creek. The four rustic areas identified in the Plan also appear to provide sensible location-specific direction regarding the most heavily used areas of the park, while recognizing both historical and contemporary human use.

The State is concerned, however, that now that the Service intends for the Plan to replace the 1984 GMP, as a stand-alone document it does not fully address the specific provisions in Section 1301 of the Alaska National Interest Lands Conservation Act (ANILCA), as is required in the Service's 2006 Management Policies (2006 NPS Management Policies, pg. 26, section 2.3.1.11).

These and other issues are addressed in more detail below.

### Management Zones

We support aligning the boundaries of the management zones with the boundary of designated wilderness as depicted in Alternative B; however, we are not supportive of extending the primitive backcountry boundary beyond the boundary of designated wilderness as depicted in Alternative C. The management zone boundaries in Alternative B more appropriately reflect the management intent for the wilderness area in contrast to the remainder of the Park and Preserve. In addition, according to the EA, the primitive zone in Alternative C includes additional areas near the coast that are difficult to access because of dense brush. Difficult access is not sufficient justification for a more restrictive management



zone. Precisely because the brush makes access difficult, we support keeping management options, such as trail construction, open in this area by zoning it as backcountry rather than primitive backcountry.

The Legislative History of ANILCA (96 S. Rpt 413, Dec. 14, 1979) discussion regarding Section 701(6): Lake Clark Wilderness, also supports aligning the primitive backcountry boundary with the boundary for designated wilderness, as well as the efforts to increase recreational opportunities within the Park. The report states:

*“Lake Clark Wilderness consists of about 2,468,000 acres within Lake Clark National Park and Preserve.... Lake Clark Park/Preserve has some of the best potential for recreation in the State [emphasis added], because of its easy access from Anchorage. The designation as wilderness of the mountainous core area and some of the key lowland areas ensures that there will be a balance between higher density recreation on the fringes of the area and high quality wilderness public use in the heart of the park and preserve. The Committee modified some of the wilderness exclusions to be left out of wilderness sufficient lands for possible development of recreational sites, while retaining the wilderness qualities of the unit.” [emphasis added]*

### **Visitor Impacts and Facilities**

We support the overall intent to apply a graduated strategy to respond to visitor impacts and the variety of adaptive management strategies listed. As indicated in Alternative B, we support providing additional visitor facilities, such as trails and primitive camping areas, in areas where visitors would most benefit, and where facilities are needed to reduce impacts to resources, regardless of whether the location is within or outside of designated wilderness.

### **Cabins**

We support the proposal in Alternative B to make 3-8 existing cabins available for public use. These cabins are excellent examples of the Park’s cultural history. Designating them for public use will allow visitors a chance to experience the uniquely Alaskan lifestyle that ANILCA sought to maintain. ANILCA Section 1315 provides for retention and maintenance of existing cabins and, as necessary for the protection of public health and safety, construction of new cabins and shelters in designated wilderness.

Alternative B states *“There would be no public use cabins in designated wilderness.”* We request Alternative B instead allow for consideration of public use cabins in designated wilderness, consistent with ANILCA, and provide the public the opportunity to weigh in on whether there is a current or future need for cabins. Alternatively, the Plan could defer the decision to the forthcoming cabin management plan, where site-specific options could be given further consideration.

### **Wilderness**

We support the Service’s decision to not conduct a full wilderness study in conjunction with this plan amendment, while reiterating our previous objections (State of Alaska comments dated 9/1/2011 and 5/7/2012) to conducting any phase of a wilderness study (i.e. eligibility reassessment) or future wilderness studies in Alaska. ANILCA Section 1317 provided the Service with a one-time opportunity to conduct a wilderness study of Alaska park units, which was to be completed within five years



following the passage of the Act. ANILCA Section 1326 prohibits new studies without Congressional approval.

It is unclear why the plan does not reference ANILCA Section 1317 or the prior, well-documented wilderness reviews conducted by the Service for Alaska parks pursuant to ANILCA Section 1317(a). While wilderness recommendations were not forwarded from the Secretary of Interior to the President or Congress, the reviews were conducted and completed in accordance with the National Environmental Policy Act, including issuing Records of Decision for each park unit, including Lake Clark. Further, the eligibility re-assessment in this Plan is based on eligibility determinations conducted pursuant to the ANILCA Section 1317 reviews. We request the Plan include this historical and relevant information.

The Plan does reference direction in the 2006 national management policies which states “...no action will be taken in these eligible areas that would diminish their eligibility until the legislative process of wilderness designation has been completed” (Page 17). As noted, the reviews were completed but resulted in no wilderness recommendations being forwarded to Congress for consideration. It is therefore inappropriate to manage “eligible” areas as wilderness until the completion of a legislative process that was never initiated.

### **Fire Management**

We respect the various land management objectives in the Plan under which the Service, other agencies or private entities manage the lands within the Park and Preserve, including the Alaska Department of Fish and Game (ADF&G), which has the primary responsibility for managing fish and wildlife populations throughout the State. Per the ADF&G Fire Management Policy (see enclosure) the State encourages the Service to maintain a natural fire regime within the Park and Preserve, to the extent possible, consistent with resource management objectives. To be clear, ADF&G advocates that fire suppression efforts focus on the protection of human life, property, and high value resources, and where possible, mitigate undesired effects of fire suppression on the fish and wildlife resources. This policy is in alignment with the Plan’s fire management strategy on page 193-194 under “Desired Condition/Goals,” bullet #4: “*Park fire management programs are designed specifically to meet park resource management objectives – including allowing fire to perform its natural role as much as practicable – and ensure that firefighter and public safety are not compromised.*”

At times, the State identifies specific areas where wildlife management programs could benefit from the use of fire, natural or prescribed, or suppression of fire. In the interest of managing species and supporting their respective habitats, ADF&G requests that the Service consider these opportunities when they arise to help achieve wildlife management objectives in those areas. Communication with ADF&G staff during wildland fire incidents or when planning prescribed fire treatments will foster the coordination and cooperation necessary to adjust fire management strategies with respect to wildlife management needs.

### **Proposed Water Trail**

The Plan provides virtually no information regarding the potential in Alternative B to establish a water route on Lake Clark (Table 3, Trails and Routes, page 71). If the intent is to propose a water trail on Lake Clark as part of the National Recreation Trail System, we request that the plan disclose that the National Trail System Act and Secretarial Order 3319 require support from the landowner to designate



trails on non-federal lands (the State owns the submerged lands of all navigable waterways). In addition, Section 103(c) of ANILCA limits the Service's authority to manage waters within the boundaries of park units in Alaska. We request the Plan state that the Service will coordinate with the State on any future proposals and that no proposals will be forwarded without State support.

### Planning Process Issues

Two changes to the Plan occurred late in the planning process, which we believe are significant.

First, up until the EA was released for public review, the Plan was considered an update to certain elements of the 1984 GMP. The May 31, 2011 Notice of Intent published in the Federal Register, the February 2013 GMP Alternative Newsletter, and earlier versions of the Plan, all indicated that the 1984 GMP would remain in place, subject to the GMP Amendment. In fact, some of the earlier intent is still in the current version of the Plan (e.g. page 3 states "*This GMP Amendment revises and updates much of the 1984 General Management Plan*"). However, the Plan now states and the Service has confirmed that it will "replace" the 1984 GMP (page 7). This is the first time a park unit in Alaska has proposed to replace their original GMP. Previous planning efforts have resulted in step-down plans, which provided guidance to update or supplement the original GMPs.

In addition, the 1984 GMP states "*The plan will be revised and amended as needed subject to the same public review and coordination procedures required by the National Park Service's planning guidelines and relevant requirements of ANILCA.*" The national 2006 NPS Management Policies also direct park units in Alaska to address the specific provisions in Section 1301 of the Alaska National Interest Lands Conservation Act (ANILCA) (Page 26, Section 2.3.1.11). However, the Plan does not specifically reference ANILCA Section 1301, and as indicated in the above quote from page 3, it does not include all of the required elements outlined in Section 1301(a)-(c). In addition, some of the required elements that are addressed in the Plan lack substance and references to important provisions of ANILCA, which are part of the 1984 GMP, are not included the plan amendment.

We also question whether the public meetings held by the Service for the plan amendment meet the requirement to hold public *hearings* in Section 1301(d). Public hearings are distinct from public meetings in that public testimony is transcribed or recorded, which establishes a formal public record for current and historical use. ANILCA Section 1301(d) also requires the Service to include the State and other entities in the planning process, specifically to "*participate in the development, preparation, and revision*" of the required management plans. While the amended plan accurately discloses the Services efforts to consult with the State during the planning process (page 153), the overarching commitment in ANILCA, which is reflected throughout the 1984 GMP (e.g. Page 47)<sup>1</sup>, is not included in the amended Plan.

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<sup>1</sup> "Throughout this plan there has been heavy emphasis on cooperation between the federal, state, and private entities. This is required for effective area management under several ANILCA provisions. Field level operations to date have been accomplished with a great deal of cooperative effort in such areas as fish and game management, search and rescue, fire management, and law enforcement. Under this plan, these activities will continue and expand to meet area resource and visitor needs."



Second, the NPS Alaska Regional Management Guidelines (Guidelines), which are frequently referenced in the Plan and provide the bulk of the ANILCA context, were initially going to be fully incorporated into the amended plan. These Guidelines are essentially a compilation of general and park-specific management direction, based on relevant laws, regulations and policies. However, instead of being incorporated into the Plan, the Guidelines were posted separately on the park's planning website prior to release of the draft plan amendment. The Plan characterizes the Guidelines as "*Additional Alaska policies*" which are supplemental to the Service's 2006 Management Policies (page 12). While the 2006 national policies underwent extensive public review, the Guidelines for Alaska park units have not received any public review.

The Service needs to carefully consider whether the planning elements required by ANILCA Section 1301 have been addressed in this plan amendment. If all required elements have been addressed in the amended plan or some combination of the amended plan and other completed step-down plans, the Plan needs to, at a minimum, describe the elements required in ANILCA Section 1301 and identify how the individual requirements have been complied with. In that case, we also suggest the Plan be referred to as a new GMP and not an "amendment" as the current title is misleading. If not, we recommend either revising the Plan to include these elements, or reversing the stated intent to "replace" the original GMP in its entirety.

We also request the Service incorporate the Guidelines into the Plan as originally intended so that the full ANILCA context is appropriately recognized in this and any subsequent step-down plans. Without the Guidelines, the Plan has essentially been stripped of all relevant provisions of ANILCA that apply to the issues addressed in the plan, which does not help the public or park management understand or comply with the unique provisions of ANILCA that apply only to Alaska's park units. We also request the Service provide an opportunity for public comment on the Plan with the Guidelines (i.e. ANILCA context) incorporated. Doing so would also allow the Service an opportunity to hold public *hearings* as required by ANILCA Section 1301. The Service should also consider whether other portfolio-related documents, which have been posted on the Park's website without public review, are subject to the planning and hearing requirements in ANILCA Section 1301.

### **Regional Management Guidelines**

In addition to the concerns expressed above, we note that the Guidelines reference statements from the 1984 GMP, which the Service states it intends to replace with this Plan. Regardless of whether the 1984 GMP is retained or replaced, two statements in particular "*Off-road vehicles were not found to be a means of surface transportation traditionally employed for subsistence in Lake Clark (ANILCA 811)*" (page 12) and "*...the use of off-road vehicles has not been shown to be a traditional means of access*" (page 17) need to be reconciled with other statements in the 1984 GMP, such as "*Most [subsistence] use occurs by means of boat, three wheeler, snowmachine, and foot travel*" (Page 17, emphasis added) and the current recognition and allowance for subsistence use of ORVs for firewood gathering in the Port Alsworth area.

### **Page-specific Comments**

Page 6, Lake Clark National Park and Preserve Map: The map included here is insufficient to meet the requirements of ANILCA Section 1301(b) (1). Section 1301(b)(1) requires *maps* indicating areas of particular importance as to natural, historic, wildlife, cultural, archeological, paleontological, geological,



recreational, and similar resources. Since the wording in ANILCA specifies maps, not map(s), a specific map discussing each resource/resource area is required. In a park the size and scale of LACL, maps at a smaller scale showing greater detail would be useful. In addition, assigning either figures or numbers and titles would be useful for reference throughout the document.

Page 7, Purpose and Need for the GMP Amendment: This section needs to recognize the planning requirements in ANILCA Section 1301. In addition, this section states that the 1984 GMP did not adequately establish visitor experience goals, nor did it specifically identify indicators, measures, and standards for measuring success. It also states the GMP amendment will provide a framework for assessing whether visitor use is resulting in acceptable changes and take appropriate action. This discussion is incomplete without identifying ANILCA implementing regulations that provide the Service with the authority and sideboards for limiting ANILCA authorized uses and activities. For example, 36 CFR 13.50 gives Superintendents the authority to close an area or restrict an activity on an emergency, temporary, or permanent basis; however, that authority is subject to specific criteria.

Page 7, column 2, 2<sup>nd</sup> sentence: The statement “*it is probable that use levels will increase in the future*” is unsubstantiated. Please provide the data used to reach this conclusion. The same statement was made in the 1984 Plan, and a review of the NPS’s Statistics Annual Park Recreation Visitation Graph for LACL (calendar years 1981 to 2013) shows that overall visitor use last year correlates with the amount of visitor use the Park had during the 1980’s and 1990’s. During the early 2000s Park visitation numbers were actually much lower.

Page 9, Purposes of Lake Clark National Park and Preserve: While we recognize the first bullet is a quote from the Park’s Foundation Statement, it inserts terminology not found in ANILCA, such as “wilderness dependent” when referring to fish and wildlife populations. Consistent with our comments on the draft Foundation Statement (State of Alaska letter dated 4/27/09), there is no qualifier that describes fish and wildlife as “wilderness dependent” in the general purposes in ANILCA Section 101(c) or the explicit purposes for Lake Clark in ANILCA Section 201(7)(a). The NPS General Management Plan Dynamic Sourcebook version 2.1 (with revisions thru the fall of 2009) indicates that the purpose of the park should concentrate on why the park was established, as described in the founding legislation.

*A park’s purpose, significance, and special mandates are derived from and bounded by law and policy....It is important to remember that new decisions are not being made through this process; the park purpose and significance have usually been debated on the floor of Congress.*  
(Sourcebook, pg. 6-5 to 6-6)

To be consistent with ANILCA and Service guidance, we request the first summary bullet be removed from the Plan.

Page 11, Special Mandates and Administrative Commitments Related to Lake Clark National Park and Preserve: We request the following information regarding ADF&G’s management authority be added to this section.



Preserves: ANILCA sections 203 and 1313 direct the Service to allow fishing, hunting, and trapping on national preserves. ADF&G is responsible for the sustainability of fish and wildlife in the State of Alaska, regardless of land ownership, and is the primary management authority for fish and wildlife, which includes determining healthy populations and allocating fish and wildlife – including for subsistence purposes, unless specifically preempted by federal law.

Page 11, Key Laws, Regulations, and Policies: ANILCA Section 707 clearly states the relationship between the Wilderness Act and ANILCA, “*Except as otherwise expressly provided for in this Act wilderness designated by this Act shall be administered in accordance with applicable provisions of the Wilderness Act.*” We request the Plan quote this section of ANILCA in place of the current phrase “...is subject to the provisions of ANILCA and the Wilderness Act.” In addition, we request this section not only identify ANILCA as the establishing legislation, but also add that many provisions in ANILCA provide for management direction unique to Alaska’s park units.

Page 14, Planning Issues: ANILCA Section 1301(b)(2) requires “*A description of programs and methods that will be employed to manage fish and wildlife resources and habitats, cultural, geological, recreational, and wilderness resources, and how each conservation system unit will contribute to overall resources management goals of that region. Such program should include research, protection, restoration, development and interpretation as appropriate.*” Consistent with the above general comment, we question whether the scope of the Plan fully meets these requirements.

Page 14, Visitor Use and Experience: A discussion of how visitor use has changed since the park was designated would assist in documenting how LACL is meeting its establishing purposes, as is required by ANILCA Section 1301(c)(1).

Page 17, Planning Issues and Concerns Not addressed in this GMP Amendment: The last paragraph states that the subsistence use and management directions in the 1984 GMP still apply within the park and preserve. This implies that, contrary to the Service’s stated intent, direction in the 1984 GMP is not being replaced by this plan amendment.

Page 17, Proposals for Wilderness Designation: The discussion here fails to include important information regarding ANILCA Sections 1317 and 1326, which limits the Service’s authority to conduct wilderness studies in Alaska. This information should be included in this section. See above general comment. (This comment also applies to pages 20, 173, and 192)

Page 18, External Pressures and Boundary Issues, last paragraph: The Plan indicates the park’s land protection plan, which is currently under revision, was finalized in 2014. To our knowledge, the final plan has not been released nor has it been posted on the park’s planning website.

Page 20, Table 1, Impact Topics, Wilderness Character: Relevant Law, Regulation, or Policy Please include ANILCA and implementing regulations at 36 CFR 13 and 43 CFR 36.

Page 22, Table 1, Impact Topics, Visitor Use and Experience (including access, recreational opportunities and experiences, and interpretation and education), Relevant Law, Regulation and Policy: Please include ANILCA and implementing regulations at 36 CFR 13 and 43 CFR 36.



Page 29, Portfolio Management Plans for Lake Clark National Park and Preserve: This section needs to discuss the planning requirements in ANILCA Section 1301 and explain how they have been integrated into this Plan.

Page 35, Potential for Boundary Adjustments: See above comment about the completion of the park's land protection plan. Also, the last paragraph references ANILCA Section 1306, which authorizes the Secretary to establish administrative sites outside the boundaries of the unit and directs the Secretary to attempt to locate such sites and facilities on Native lands in the vicinity of the unit. This has little relevance to boundary adjustments. The statement "*In addition, congressional approval is not needed to do so*" is also confusing. The direction in ANILCA, which provides the Secretary with the authority to establish sites and visitor facilities outside a unit's boundary, came from Congress. We recommend this entire discussion be removed from the section.

Page 36, Rustic Areas: We request ANILCA be included in the list of laws, policies and guidance that apply to these areas.

Page 36, Rustic Areas, Richard L. Proenneke Area: We request ANILCA be included in the list of laws, policies and guidance that apply to this area.

Page 37, Rustic Areas...: The character descriptors for the three areas on this page vary. The Silver Salmon Creek Area is being managed for its "wild backcountry character"; the Chinitna Bay Area is being managed to provide a "wild rustic experience" and the Crescent Lake Area is managed for its "wild character." It is unclear whether there is a difference between these descriptors. We recommend using consistent, defined terms to ensure clear management intent.

Page 47, Management Zones: The Primitive Backcountry zone needs to also reference Sections 1315(a) and (c) regarding wilderness management in Alaska, including cabins, and Section 1316 regarding the continuation of existing uses and future establishment and use of temporary facilities and equipment on all public lands where the taking of fish and wildlife is permitted.

Page 47, Management Zones: The Backcountry zone section needs to reference ANILCA Sections 1303(a) regarding cabins and 1316 regarding the continuation of existing uses and future establishment and use of temporary facilities and equipment on all public lands where the taking of fish and wildlife is permitted.

Page 48, Visitor Use Management, Introduction: This section needs to also reference the planning requirements in ANILCA Section 1301, which apply to park units in Alaska.

Page 58, Actions Common to All Alternatives, third bullet: This bullet also needs to reference ANILCA. Specifically, we request "Wilderness Act" be modified to read "Wilderness Act, as modified by ANILCA."

Page 58, Actions Common to All Alternatives, fourth bullet: ANILCA Sections 1303, 1315 and 1316 also need to be referenced. Regulations cited should also include 43 CFR 36.



Page 58, Actions Common to All Alternatives, sixth bullet: We request the State of Alaska be referred to specifically, rather than as part of “other governmental organizations.”

Page 59, Actions Common to All Alternatives, last paragraph: We request ANILCA be specifically referenced as an applicable law and that the Wilderness Act be cited as “the Wilderness Act, as amended by ANILCA.”

Page 75, Table 4 Annual Cost Estimates for the Alternatives: The GMP Sourcebook states that Cost estimates in GMPs are required by the 1978 Parks and Recreation Act and that the public needs to have an overall picture of the estimated costs of the various alternatives. Plans should include estimates of annual operating costs and of one-time costs for facility rehabilitation, new construction, or management projects, maintenance, as well as one time projects such as facilities, research, and resource rehabilitation. Costs estimates also need to include the year in which they were made.

In addition, ANILCA 1301(b)(3) requires cost estimates of any potential or proposed development, to include any visitor services and facilities. For example, what services and facilities will be needed for the proposed “water route” for Lake Clark and what are the estimated costs associated with that route. We recognize that costs provided will be estimates but some greater level of specificity is needed.

Page 65, Management Zoning, second paragraph: To be consistent with the maps and the categories on page 47, the reference to frontcountry zone should be changed to “administrative zone.”

Page 93, Brown and Black Bear, first paragraph, second sentence: The term “substance” should be corrected with the word “subsistence” in the following sentence, “*However, it has been estimated that only 14%-18% of bears taken by substance users are reported.*” Additionally, there is a limited harvest of up to 10 bears, and with only 14-18% reported. What is the actual mean annual subsistence harvest? The document should also clarify the actual harvest of bears by subsistence users.

Page 107, Untrammled, second paragraph: The following sentence is inaccurate and misleading: “*There is a legacy of not taking management actions in order to maintain the untrammled quality of wilderness character.*” Subsistence hunting is allowed within the park and preserve, and general hunting is allowed within the preserve. Both of these allowed uses involve forms of wildlife management through the regulation of hunting. Harvest through regulated seasons, bag limits and other actions are wildlife management tools and are all part of the State’s responsibility to manage wildlife on the sustained yield basis consistent with the Alaska Constitution. The absence of these tools would deviate from the requirement for scientific management and would be unacceptable to the State and likely to the Service as well. Both the Service and ADF&G have ongoing research programs that utilize radio telemetry and other means to make informed management decisions. We are concerned that the current language could negatively impact the State’s ability to fulfill its constitutional mandate regarding wildlife conservation.

Page 134, Richard L. Proenneke Historic Site, Analysis: The Plan should expand the impact analysis to consider the adverse impacts to visitors who prefer an interpretive presence at the Proenneke Site, and



whose experience is enhanced by visitor facilities such as designated public use cabins and primitive camping areas.

Page 185, Mountain Landscapes, Description: We request the second to last sentence be amended as follows:

The State of Alaska has authority to manage water based on the Submerged Lands Act of 1953, the Alaska Statehood Act of 1958, ~~and the Alaska State Constitution, and the Alaska Water Use Act statutes and regulations.~~

Page 185, Mountain Landscapes, Policy/Laws/ANILCA: We request this section recognize ANILCA Section 103(c), which specifically excludes state-owned lands and waters from National Park units in Alaska and prohibits the application of Park Service regulations to state-owned lands and waters.

Page 186, Mountain Landscapes, Strategies, second and third bullets: We request clarification that wilderness character will be protected in designated wilderness.

Page 189, Salmon Fishery, Other Important Resources and Values, Strategies: We request the Service clarify the intent behind the statement “*Minimize human impacts to the red salmon population, ...*” The sockeye salmon population is closely managed by the State under the sustained yield principle to provide for a variety of beneficial uses, including commercial, subsistence and sport uses. Human impacts to the sockeye salmon population are recognized but populations are managed to support these uses. We are concerned that “minimizing human impacts” could be interpreted as seeking “no impacts” or impairment, and reduce or eliminate their long established and managed use by humans.

In addition, ANILCA Section 103(c) specifically excludes state-owned lands and waters from National Park units in Alaska and prohibits application of Park Service regulations to them. We therefore request the following edit to the third bullet:

*The National Park Service will not allow introduction of nonnative species or hatchery fish, lake fertilization, or erection of artificial passageways on NPS lands and non-navigable waters.*

Page 191, Subarctic Fish & Wildlife Populations & Habitats, fifth bullet: Subarctic Fish & Wildlife Populations & Habitats, Strategies: We have concerns with the first part of the following strategy, “***The park avoids wildlife manipulation, and wildlife habitat in the wilderness varies naturally based on complex interactions between recent physical (e.g., precipitation, temperature) and biological (e.g., insect outbreaks, plant disease) factors.***”[emphasis added] For consistency and clarity, we request that the Service instead use language from the 2006 Regional Management Policies Section 4.4.2 Management of Native Plants and Animals. See page 107 comment.

Page 192, Strategies, first and second bullets: A Minimum Requirements Analysis (MRA) is only required when the proposed project in designated Wilderness involves prohibited activities. Particularly in regards to research conducted by the State, the decision point should be the MRA, not whether the research is consistent with the Service’s mandates.



Page 192, Wilderness, Strategies, eighth bullet: See previous comment on Subarctic Fish and Wildlife Populations and Habitats on page 107.

Page 192, Wilderness, Strategies, 9<sup>th</sup> bullet: We request this bullet acknowledge that the wilderness designation process must also comply with ANILCA. See above general comment.

Page 192, Wild Rivers, Policy/Laws/ANILCA, 2<sup>nd</sup> bullet: Any provision in ANILCA that applies to CSUs applies to Wild Rivers. We recommend referencing ANILCA generally, rather than citing only Section 601.

Pg. 193, Appendix C, Fire Management: The Policy/Laws/ANILCA should reference the Alaska Interagency Fire Management Plan 2010, which replaced the 1998 plan. ([Alaska Interagency Wildland Fire Management Plan 2010](#)).

Page 205, Subsistence, Desired Conditions and Goals, Fundamental Resources & Values, Subsistence Resources, second bullet: There is no mandate in ANILCA or Service policies to maintain a “natural balance” of fish and wildlife populations. However, Section 816 of ANILCA details the sideboards for a closure to subsistence uses that include, “reasons of public safety, administration, or to assure the continued viability of such population.” We request the following edit:

*Continued consumptive uses of fish and wildlife populations, and the collection of firewood, edible plants and other materials within the park do not disrupt the viability of populations “natural balance”.*

Page 206, Subsistence, Strategies, fourth bullet: We recognize the following statement stems from the 2006 Regional Management Policies, Section 4.4.3 Harvest of Plants and Animals by the Public:

*Neither habitat manipulation nor the reduction of one species to increase the abundance of another will be undertaken for the purpose of maintaining subsistence uses within the park and preserve.*

We are concerned that the specific reference to subsistence uses implies a disregard by the Service of the area residents’ needs for subsistence. Numerous Sections in ANILCA Title VIII specifically require consultation and coordination with the State of Alaska in providing subsistence opportunities. The State of Alaska strongly supports maintaining subsistence uses, through active management if necessary and appropriate, and is troubled by the Service’s statement to the contrary, which could lead to a failure to provide for subsistence opportunities and subsequent environmental justice issues.

Page 206, Subsistence, Strategies, tenth bullet: The criteria listed apply to subsistence closures affecting plants, fish and wildlife. We request the Plan add the general reference “...pursuant to 36 CFR Part 13 regulations.”

Page 208, Commercial Services, Strategies: We suggest including a bullet that shows support for the ANILCA Section 1308 local hire program. This would also meet a requirement of ANILCA Section 1301.



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

Sincerely,



Susan Magee  
ANILCA Program Coordinator