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CSU Review
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May 10, 1984

Roger Contor
Regional Director
National Park Service
2525 Gambell Street, Room 107
Anchorage, AK 99503-2892

Dear Mr. Contor:

The State Conservation System Units (CSU) Contacts have completed their review of the March 1984 draft of the General Management Plan for Glacier Bay National Park and Preserve. The current plan has resolved or identified many of the major issues addressed by the State in earlier correspondence. However, before we can endorse the plan as a whole, there are still a few important issues which need to be addressed.

The State's greatest concern is implementation of the recommendation to redesignate certain wilderness waters to a less restrictive designation. This would allow commercial fishing in the Beardslee Islands, Hugh Miller Inlet, and Dundas Bay. In return, the National Park Service (NPS) proposes to enter Muir Inlet as its candidate for addition into wilderness waters designation. These actions are those agreed upon by the NPS, State agencies, and members of the fishing community and environmental groups in a meeting at Bartlett Cove in the fall of 1983. The State feels that this is a reasonable compromise which strikes a balance between commercial fishermen and other interests, although we still have some concern about the 10-year phase-out of cruise ship activity.

We hope and anticipate that the remaining issues noted below can be adequately addressed in a manner which is mutually satisfactory to both the State and the NPS. To accomplish this in a timely manner will require a commitment to close cooperation.

Some of the significant issues which need further discussion include:

1. Clarification and acknowledgment of NPS plans to comply with State and federal laws in instances where proposed NPS activities may affect water quality and pollution control;

2. Further analysis of the impact of the recommended air quality classification redesignation;
3. Clarification of several key issues relating to fish and wildlife use and management.

Attached are the State agencies' specific comments on the Glacier Bay General Management Plan. They are presented in two parts, beginning with specific issues which need additional discussion, clarification, or where the State proposes alternative policy. The second part includes various technical additions or corrections which will increase the plan's accuracy and usefulness.

We are prepared to discuss all of these items and look forward to assisting you in finalizing a mutually acceptable plan consistent with the requirements of the Alaska National Interest Lands Conservation Act.

Sincerely,



Sally Gibert
State CSU Coordinator

Attachments

cc: T. Tollefson, NPS
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State CSU Contacts

Remaining Issues and Policy Clarification
Glacier Bay General Management Plan
May 10, 1984

Revised Statute 2477

The State has previously requested that the following Revised Statute 2477 language, or something similar, be included in the GMP.

The National Park Service (NPS) will work cooperatively with the State to identify all rights-of-way pursuant to Revised Statutes (RS) 2477 within the park and preserve boundaries for administrative purposes. When rights or titles are granted directly by statute, such as RS 2477, these rights can only be adjudicated in the court system. However, for the purposes of carrying out NPS administrative duties, a determination would not affect the legality of a RS 2477 right-of-way, but would provide a basis for administrative actions such as acceptance of right-of-way applications or trespass actions.

Alsek River Use (p. 108)

The State has previously requested that all General Management Plans (GMP) address the issue of potential navigable waters (in this case, the Alsek River). This concern has been suitably handled in the final Lake Clark GMP and could be easily modified to apply to Glacier Bay.

Wilderness Waters Research

One of the offshoots to closure of certain waters to commercial fishing will be the re-establishment of pristine, unexploited benthic communities in these areas. Their study may require the use of motorized transport and mechanized equipment. Some indication of the NPS stance on motorized vessel use in wilderness waters for research would be appreciated.

Glacier Bay Reporting Area Revisions (p. 75)

In reference to the possibility of modifying the reporting areas for commercial fish harvest statistics, NPS should realize that if Glacier Bay fishermen perceive that their interests will be compromised, they will log their catch outside the Bay. Neither the Alaska Department of Fish and Game (ADF&G) nor NPS has the capability of differentiating Bay catch from outside catch. Without the cooperation and understanding of local commercial fishermen, statistical data resulting from reporting area changes or registration systems could be inaccurate.

Local Firewood Concerns (p. 78)

The State has some concern over the restrictions the plan places on the use of beach logs by the people of Gustavus. The demand for firewood in this community is fairly substantial and is likely to increase due to additional land sales in the area. Since the community is surrounded by the park on three sides and by water on the other, their options for obtaining firewood are limited. It would seem that allowing the salvage of beach logs in the upland beaches between Pt. Gustavus and Excursion Inlet would have little impact on the park and would be consistent with actions taken in other wilderness areas in southeast Alaska. Some reference should also be made to the apparent conflict with State policy which allows for beach log salvage on state-owned tidelands adjacent to park uplands.

The salvage of dead and down timber could also have a beneficial effect on the park if the statement on page 78 pertaining to the spruce bark beetle infestation is true. Commercial sales on the infested 4,000 acres should also be considered, particularly if there is danger of the infestation spreading to adjacent lands.

Proposed Land Trade (p. 99)

The State affirms its support of the proposed land trade which would facilitate the possible development of a hydroelectric plant on Falls Creek.

Land Acquisition Policy (p. 97)

The purpose of the land protection plan is not apparent. Specifically, it is not clear what is meant by ensuring "satisfactory protection of conveyed or adjacent lands" with respect to Native allotments.

Motorized Access (p. 109, pp. 118-19)

The GMP should be more specific regarding motorized access. The reference at the bottom of page 109 refers only to commercial fishing. Access for subsistence and sport hunting and trapping in the preserve and motorized access by guides and air taxi operators in wilderness areas need to be addressed. The GMP is also silent on the issue of aircraft beach landings. To enable the public to have a clear representation of both permitted and prohibited access modes and areas, these concerns must be clarified. Ideally, access guidelines should be consolidated to facilitate public understanding and compliance.

Sport Fisheries (p. 77)

The last sentence in the first paragraph should be broadened to include salmon and shellfish for personal use. (For example, there is a fall chum salmon fishery currently used by residents of Hoonah and Juneau in Excursion Inlet.)

Aquaculture (p. 76 para. 1)

While the State acknowledges the NPS goal of maintaining natural, self-sustaining populations, we hope that the statement "aquatic habitat cannot be modified" does not preclude maintenance of established habitat—such as the removal of a log jam in an existing salmon stream. We suggest that the following language (taken from the Lake Clark GMP) be included here:

"In order to achieve the intent of ANILCA and other NPS mandates, the National Park Service will maintain habitat and natural and healthy fish populations. 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 waters. NPS guidelines allow for maintenance of established fish migration routes and spawning areas."

An additional area of clarification which is specific to Glacier Bay involves the use of park fish stocks for hatcheries or other enhancement purposes outside the park. The use of Excursion Inlet fall chum salmon for brood stock has already been proposed.

We also note that the first sentence of the first paragraph on page 76 is inaccurate. Aquaculture activities may be permitted on all ANILCA lands except National Park System Wilderness. (See Senate debate on HR 39, Congressional Record; August 4, 1980; page S-10680).

Habitat Manipulation in the Preserve (p. 67-68)

Generally, the State is willing to support the NPS position with regard to manipulation of habitat in Glacier Bay National Park. However, we request that the plan not preclude the specific possibility of moose habitat manipulation in the preserve. Moose were first documented in the area in the 1930's, in response to emigration from the Yukon and browse growth which was a result of glacier retreat. To not manage this habitat might hamper the ability of moose to sustain themselves. Moose habitat is maintained by the process of alteration. If the NPS wishes to retain a moose population over a long time frame, habitat manipulation should be considered as a possible management tool. This is consistent with the following provision in the NPS/ADF&G Memorandum of Understanding:

"To recognize for maintenance, rehabilitation, and enhancement purposes, that under extraordinary circumstances the manipulation of habitat or animal populations may be an important tool of fish and wildlife management to be used cooperatively on Service lands and waters in Alaska by the Service or the Department when judged by the Service, on a case by case basis, to be consistent with applicable law and Park Service policy."

Air Quality (pp. 31-32)

In reference to the recommended Class I air quality designation, the State has no conceptual concern with this as it affects the park. However, it would be desirable to have some analysis regarding the effect, if any, on the residents of Gustavus, such as possible restrictions on the burning of firewood for heating if smoke and other pollutants drift over into the park.

Water Quality (pp. 30-31)

Although the NPS may have proprietary jurisdiction within the park, the State governs water quality management, water appropriation and retains subsurface ownership of navigable waters. Further, ANILCA recognizes cooperative management responsibilities between agencies of the federal and state governments. Concerning the expansion of facilities at Bartlett Cove, although existing sewer and solid waste facilities may well be in compliance with the Alaska Water Quality Standards, the facilities expansion should be reviewed with the Department of Environmental Conservation (DEC) to determine the need, if any, for upgrading existing sewer and solid waste facilities.

Also, since access to and use activities within and adjacent to the park and preserve are marine oriented, recognition should be given to oil spill contingency planning and response similar to language now included in the Kenai Fjords GMP.

Fish Processing Plant (p. 110)

The State appreciates NPS' willingness to coordinate with DEC on effluent and solid waste disposal. ADF&G is also interested in these matters. One specific concern which we have requested be addressed in the GMP is how bear/human conflicts at the dump will be handled.

Subsistence (pp. 112-113)

The first paragraph on page 112 incorrectly contains apparent implications that all subsistence users are descendants of previous generations of subsistence users and that no new subsistence opportunities will be granted after the date of ANILCA. This needs to be corrected in the final GMP.

In this section, it would be appropriate to mention that the definition of "local residents" (as used at the top of page 8) will be defined by Alaska Boards of Fisheries and Game, especially since 36 CFR 13.65 does not specify a subsistence residence zone for Glacier Bay.

Research (p. 22)

Additional clarification is needed regarding "qualified research." In particular, the GMP should mention any standards or criteria which are envisioned to determine whether research activities or results merit consideration in resource management decisions.

"Significant Habitat Areas" (p. 69)

It would be helpful to specify what significant habitat areas will be monitored, or by what means this determination will be made. ADF&G would be pleased to assist in this process.

Wildlife and Fisheries Management (pp. 66-79)

Management intentions for harbor porpoises and harbor seals are not included in this draft. If this is to be a comprehensive and long-term management plan, some consideration should be given to ensuring that visitor use causes negligible disruption of important habitats for seals and harbor porpoises.

The State appreciates the acknowledgement and inclusion of the Master Memorandum of Understanding between the NPS and the ADF&G. To further strengthen the spirit of cooperation we request that the Department of Interior's Fish and Wildlife Policy on State-Federal Relationships also be referenced.

Technical Additions or Corrections
Glacier Bay General Management Plan
May 10, 1984

GMP Reference

- p. vii "special use zone." It would be helpful to follow this term with a reference to page 93.
- p. 1 para. 4 "new uses" should be "new management responsibilities."
- p. 43 para. 3 The ADF&G knows of no sightings of bowhead whales in the Gulf of Alaska.
- p. 44 para. 1 In April 1984, the arctic peregrine falcon was reclassified by the U. S. Fish and Wildlife Service from "endangered" to "threatened" status.
- p. 56 para. 1 Preserve users also come from Juneau via aircraft.
- pp. 56-60 Hunting, fishing and trapping are existing and legitimate uses of the preserve and should be mentioned in this section.
- p. 66 para. 2 Trapping should be included as one of the ADF&G regulatory responsibilities. Also, since it is actually the Department of Revenue which handles licensing, and the Boards of Fisheries and Game which set the season and bag limits, it would be preferable to begin the second sentence in this paragraph with "The State" "The State" should also be used in the next sentence.
- p. 68 para. 2 The "resource management recommendations" represent a consolidation of recommendations of all State agencies through the State CSU office, not just ADF&G.
- p. 70 ADF&G would appreciate the opportunity to participate in formulation of detailed management plans for the Alsek, Dry Bay, Doame area commercial salmon fisheries. The fishery is dynamic enough that a statement affirming cooperation between NPS and ADF&G in this specific area would be helpful.
- p. 86 para. 1 Section 1110 of ANILCA does not specify that use of motorized vehicles must be recreation oriented.
- p. 92, top The sentence structure inadvertently implies that the zoning changes themselves are subject to congressional action.

p. 103-104 At least one hunting guide operates in the preserve. This service should be mentioned in the "commercial visitor services" section.

pp. 109-111 — Hunting, fishing, and trapping are valid existing uses of the preserve and should be mentioned in this section. A statement that ADF&G has primary management and regulatory authority regarding the taking of fish and wildlife in the preserve would also be appreciated.

p. 112 The first sentence reads more clearly if the word "continued" is inserted before "sport and subsistence hunting" Otherwise there is possible implication that the taking of fish and game (except for subsistence) is a new use.

Species Identification: The following pages contain general references to wildlife that, if possible, should specify which species is being referred to: p. 36 (bear), p. 38 (ptarmigan), p. 40 (seals, whales), p. 42 (crabs, shrimp).