

STATE OF ALASKA

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Roger Contor
Regional Director
National Park Service
2525 Gambell Street, Room 107
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Dear Mr. Contor:

The State has completed its review of the **Kobuk Valley** National Park Draft Statement for Management. The following comments are intended to assist your efforts in the eventual revision of this document and preparation of the forthcoming General Management Plan (GMP). The State Conservation System Unit (CSU) Contacts found the resource uses and issues portion to be fairly complete. However, they also noted that the generic nature of the Management Objectives section precluded most meaningful specific comment.

Throughout the document, it is evident that the National Park Service (NPS) is striving to deal with the difficult management task of providing for recreational use while simultaneously protecting subsistence opportunities. On this subject, we offer the following observations and recommendations.

On page 11, NPS projects that recreational use will increase "because of publicity to the area." Undoubtedly much of this publicity will be generated by NPS itself, and due to the nature of the area, even the most modest public information program may result in a relatively large increase in visitor use. To the maximum extent possible, we urge that NPS avoid creating a market for more intensive recreational use of the park. Instead we suggest that NPS respond to actual demand on an informational level and provide additional visitor services only after they have been deemed necessary.

An important factor in determining the appropriateness of any proposed NPS program or facility is whether it will alleviate problems resulting from conflicting uses, or whether it will attract more opportunity for such conflict. While the discussion of issues begins to acknowledge this distinction, the management objectives which are presented fail to incorporate this sensitivity. Examples of this can be found in the fifth objective on page 22, and the fourth objective on pages 23 and 24, which refer to possible interpretive programs and/or facilities in Kotzebue and at Onion Portage.

State Contacts also requested that the overall tone of the discussion on recreation and subsistence conflicts be modified. While it is appropriate to bring these issues to light, there appears to be a somewhat negative tone expressed in portions of the discussion, and possibly an overstatement of the difficulties. The recreation/subsistence conflict is an issue which can be further aggravated by perceptions of the problem. Therefore, NPS should pay particular attention to it's own perceptions and interpretation of the issue, and favor the fostering of understanding, cooperation and education over proposals for restrictions or permits whenever possible.

Comments specific to particular sections of the document include the following:

Significant Resources. A more appropriate heading for this section would be Significant Natural Features. It is presumed that the future GMP will contain a more thorough inventory of a full range of natural resources in and near the park, their relationship to the park and NPS management intent. The State CSU Contacts have specifically requested that the following resources be discussed in the draft GMP: timber (for houselogs and firewood), fish and wildlife resources and uses, and geothermal resources. (Geothermal resources are known in the vicinity of Kiana and the Reed River.)

Major Issues. The lack of fish and wildlife-related law enforcement is an issue that should be mentioned in this document. Currently, there are few subsistence fishing regulations, and game regulations are enforced only sporadically. Violations are common place. One of the more serious examples is the wanton waste of fish and game, both within and outside the park boundaries. To rectify this situation, the State is interested in exploring cooperative means of enforcement with NPS.

A second issue concerns the socio-economic impacts of increasing recreation use or resource development on non-NPS lands in or near the park. It would be useful to discuss projections of recreation use, local employment opportunities, and growth of local transportation services, especially as they are affected by NPS administration, management, and development. NPS should also recognize that local employment opportunities associated with park development may encourage a gradual shift from a subsistence lifestyle towards an increasing reliance on a cash economy. An inventory of locally available skills would be useful in designing any local hire program. We are encouraged by current NPS plans to provide for education and training to qualified local residents. This is an important consideration and is consistent with State labor objectives.

Other Specific Comments

- P. 4 Para. 4: Reference is made to "...substantial populations of wildlife..." including Dall sheep and arctic hares. Neither of these populations can be called substantial, the subjective nature of the term notwithstanding. It is doubtful that the Dall sheep population will increase substantially unless they are transplanted, and the park does not provide the proper habitat for arctic hares.
- Land Status: In future plans, it would be desirable to include a regional location map which shows adjacent land ownership patterns and the relationship of this park to other conservation system units.
- P. 5 Para. 1: Alaska Department of Fish and Game (ADF&G) biologists report that residents of the villages of Buckland, Candle, Deering, Noatak, and Kivalina use the park for subsistence purposes. NPS management intent with respect to this use should be addressed in the GMP.
- P. 5 Para. 2: We are encouraged by this discussion, however, we request that it be expanded to address how NPS intends to go about interpreting or defining "natural and healthy" specifically for this park.
- P. 13 Para. 4: Fly-in sport fishermen from outside the region are cited as an example of having "the potential to create competition for resources." However, the fly-in sport fishermen have very little direct impact on sport fishing resources since most of these fish are hooked and released. ADF&G Sport Fisheries Division has been monitoring the sport fishery of the Kobuk River and has found that most of the sport fishing effort occurs outside the boundaries of the park and that estimated catches are small.

Of course, the actual numbers of fish caught is not the only impact of sport fishing use in the park. There is also the public perception problem of crowding in an environment where a high quality fishing experience is directly related to the sense of relative solitude. In discussions of "competition for resources" this distinction is important.

A third point in this paragraph which is inadequately addressed is the acknowledgement of the larger systems in the region, including sport, subsistence, and commercial fisheries within and/or outside the park. Discussions in the GMP should reflect an understanding that the park is an arbitrary unit of land and water and is not a closed ecological system. To the maximum extent possible, NPS management activities affecting fish and other wildlife resources should consider these larger systems.

P. 14 Para. 2 and
P. 22 Para. 2:

The State acknowledges the special relationship that NPS is developing with Alaska Natives as specified in the park's purposes in the Alaska National Interest Lands Conservation Act. However, NPS should avoid any inadvertent implications that subsistence use is or will be limited to Natives.

Pp. 14-15:

In this Cooperative Lands and Resources Management section, the Alaska Department of Natural Resources and the Alaska Department of Environmental Conservation (DEC) should also be mentioned. DEC is willing to work with NPS specifically on the maintenance of water quality within the park. Land exchanges and boundary adjustments are additional topics requiring coordination and cooperation with adjacent landowners.

P. 20 Para. 3:

This objective states:

Consider man--particularly the subsistence user--an integral part of the park's total ecosystem and encourage his living in harmony with the system so as to maintain natural balances.

This is a valid goal, yet it may not be possible to achieve and still maintain "healthy and natural" fish and wildlife resources. Modern technology has afforded the subsistence user with greatly increased harvesting efficiency and mobility in recent years. Subsistence users are not subject to the same ecological pressures as other predators. It may take more than "encouragement" for subsistence users to live in harmony and yet maintain natural balances.

- P. 22 Para. 5: It would be more accurate to refer to the "Arctic Caribou Herd" as the "Western Arctic Caribou Herd."
- P. 23 Para. 5: Providing information to visitors about public safety is certainly a valid objective, however it is an unrealistic goal "to prevent injuries," especially in such a remote area.
- P. 24 Para. 2: "...providing visitors with such safety measures as reports of weather...and that subsistence hunting--with possible dangers--occurs in the park," is an example of the possible tone and perception difficulties noted earlier in these comments. The unspecified "possible dangers" inadvertently puts greater emphasis on conflict rather than understanding and education.

We realize that more specific management policies will be discussed in the future draft GMP, and we hope this will include recognition of these comments and the additional state concerns presented in the Resource Management Recommendations of February 24, 1984. We are anxious to assist you and your staff in the ongoing planning of this and other NPS units in the State. Thank you for the opportunity to comment on this Statement for Management.

Sincerely,



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State CSU Coordinator

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