

STATE OF ALASKA

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET DIVISION OF GOVERNMENTAL COORDINATION

BILL SHEFFIELD, GOVERNOR

STATE CSU COORDINATOR
2600 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2798
PHONE: (907) 274-1581

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Boyd Evison
Regional Director
National Park Service
2525 Gambell Street
Anchorage, AK 99503-2892

Dear Mr. Evison:

The State has completed its review of the National Park Service (NPS) draft General Management Plan (GMP) for the Wrangell-St. Elias National Park and Preserve (NPPr). Our major concern with the General Management Plan (GMP) is the lack of clear management intent and detail regarding transportation and access, valid existing rights and the natural resources. The following clarify these comments and provide suggestions to improve the draft. We look forward to opportunities to clarify these concerns and resolve the issues cooperatively with NPS prior to adoption of the final GMP.

Adequate assessment of the proposed resources management is difficult until data are provided and management intent is more clearly described as required by the Alaska National Interest Lands Conservation Act (ANILCA) Section 1301 (for example, there is no mention of fish anywhere in the Affected Environment section). In contrast management intent directed toward nonresident visitors is over-emphasized, especially regarding facilities and staffing. The GMP also contains confusing inconsistencies and potential contradictions regarding current and projected visitor use. In general, it appears that proposed facility development is not consistent with "low anticipated visitation levels", especially given the five to ten-year life of the plan.

Some of our concerns span several portions of the document and are discussed together; the remaining comments are presented sequentially. Therefore, the order of our comments does not reflect their importance. We realize that some of our comments may appear repetitive. This is due in part to the organization of the GMP itself, which contains discussions of selected topics in different contexts throughout the document. Most of our comments are grouped into three major categories, Access and Transportation (page 2), Visitor Use and Facilities (page 10), and Natural Resource Management (page 14).

ACCESS AND TRANSPORTATION

We recommend that NPS make several changes to the portions of the GMP that address transportation and access. ANILCA Section 1301(b)(4) requires GMPs to include "a plan for access to, and circulation within, such unit..." (emphasis added). Currently statements addressing access are spread throughout the GMP making it very difficult to ascertain NPS management intent. All management intent regarding access and transportation should be consolidated in a single location and logically organized. In this manner, the "plan" required by ANILCA may be more evident. We have the following general recommendations regarding the organization and content under Affected Environment, Proposal, and the Land Protection Plan. Following these comments are page-specific recommendations for additions or revisions and the identification of other State concerns.

GENERAL ORGANIZATION OF ACCESS ISSUES

Discussions of access and transportation in the Affected Environment chapter should contain a summary of the existing roads, trails, airstrips, and waterways used at one time or another for transportation within the NPPr boundaries, including a brief discussion about the historical use, current use, and management status of each. The information in this section should include, but not be limited to 17(b) easements, RS 2477 rights-of-way, and the Chisana Trail.

More specifically, the discussion of 17(b) easements reserved pursuant to Section 17(b) of the Alaska Native Claims Settlement Act (ANCSA) should include a description of the easement types and uses for which each easement was designated. A list of all 17(b) easements within the NPPr or on adjacent lands that terminate at the NPPr boundary should also be included. Enclosed is a partial list of the 17(b) easements that should be included in the plan. A more complete list and additional information about these easements may be obtained from the Bureau of Land Management (BLM) or an affected ANCSA corporation. We also suggest referencing the section of the GMP which will be addressing management of these easements.

The discussion of Revised Statute (RS) 2477 should briefly describe the nature of these rights-of-way and include a list of possible RS 2477 rights-of-way in the NPPr with available information regarding the current and historical use and the management status of each. The Alaska Existing Trail System, 1973 was asserted by the State in April, 1974 and therefore should be considered as a source of possible valid RS 2477 rights-of-way and included in the plan. (Pertinent portions are enclosed). A reference to the section of the plan addressing management of these rights-of-way is also recommended.

In addition to the proposed reorganized sections above, the document should contain a map of access patterns which includes all traditional access routes, airstrips, easements, the above-referenced Alaska Existing Trails System and travelled waterways. This map would assist in meeting the requirements of ANILCA Section 1301(b)(4). This map should be checked against the map being developed for the State's Copper River Basin Area Plan (CRBAP). The CRBAP maps have additional trails that should be included on NPS maps.

Included in this same section should be a detailed description of the historical and current use, and the current controversy over the Chisana Road. The discussion should include a reference to the section of the plan where the management of this route is described.

As in the Affected Environment chapter of the plan, the Proposal chapter should also address 17(b) easements, RS 2477 rights-of-way and the Chisana Trail. Non-exclusive use easements should also be discussed.

The section on 17(b) easements should at a minimum reference the easements described in the Affected Environment chapter of the plan. It should then explain the NPS position on the management of these easements including modifications to the terms of conveyance, if any, NPS intends to pursue for these easements. By law, proper notice is required before any modifications to access are made. If none are proposed, the plan should state that NPS management intent will not affect the terms of these easements.

The discussion of RS 2477 rights-of-way in this chapter should similarly reference the rights-of-way listed under Affected Environment and include the following language:

"The National Park and Preserve is subject to valid existing rights, including rights-of-way established under Revised Statute (RS) 2477 (43 U.S.C. 932). The State may identify and assert additional RS 2477 rights-of-way within the unit.

"The State has authority to manage public rights-of-way and may do so cooperatively with the underlying fee landowner. The National Park Service, as landowner, may petition the State to disclaim an interest in or vacate any rights-of-way and/or may enter into a cooperative management agreement with the State."

Unless a cooperative management agreement between the State and NPS is developed, it is inappropriate to state that users of any rights-of-way must comply with applicable NPS permit requirements.

The discussion of the Chisana Trail in this chapter should acknowledge that the route is a likely RS 2477 right-of-way. The Department of Natural Resources (DNR) has gathered substantial evidence that the trail is a valid RS 2477 right-of-way and has attached this evidence for review by the NPS. The State intends to establish a case file in the near future and note this right-of-way to the public records.

The requested discussion of non-exclusive use easements in the Proposal chapter should outline the NPS position on the use of these easements. Non-exclusive use easements may be reserved by BLM across Native allotments when trails or areas of prior established public use overlap an allotment application. The use of non-exclusive use easements is established in the Regional Solicitor General's Opinion dated December 22, 1983 (attached). We suggest that NPS consider the benefits of requesting that BLM reserve an easement for important trails. The reservation of such easements in appropriate circumstances could protect long-standing public access to adjacent public lands and resources within the NPPr while retaining the allotment holders' property rights. Management questions associated with this land protection alternative should be addressed in this section. Pursuit of this option (and incorporating cooperative agreements or cooperative management with the State) would reduce or avoid confrontation and expensive litigation over RS 2477 rights-of-way that overlap these easements.

PAGE-SPECIFIC COMMENTS

The following recommendations are for changes or additions to specific sections of the GMP. The State's concern that access and transportation is not dealt with adequately in the GMP would be addressed if the following changes were made and the GMP reorganized as recommended above.

Several comments in this section are related to motorized access and we wish to clarify our general intent. Our primary concerns are 1) that uses of the park and preserve (including methods and means of access) be consistent, as well as compatible, with the purposes of the unit as defined by ANILCA, and 2) that restrictions on uses be implemented through appropriate procedures such as those detailed in ANILCA Title XI, ADF&G/NPS memorandum of understanding, and 36 CFR Part 13 regulations. In this latter regard, we are primarily concerned about maintaining resource values, while providing for public uses that are not detrimental, and assuring proper involvement of affected agencies and persons in development of restrictions.

We do not support access methods and means that will result in detrimental impacts on fisheries and wildlife resources. We do not intend to encourage new access methods and locations. Our comments on the plan question the proposed restrictions on access

but do not necessarily support or oppose them except where so stated. We do not wish to be misinterpreted as supporting unrestricted motorized access throughout the unit. We are concerned about retaining those opportunities provided by ANILCA that are compatible with the unit's purposes and not detrimental to the resources.

Pages 9 - 12, Access - We request that the following language (slightly modified from pages 3-25 of the Bering Land Bridge GMP) be included in this and the other GMP's:

Routes and new modes of access for subsistence will be analyzed in terms of potential for impacts on the resources (vegetation, wildlife, soils, etc.) of the unit and upon other uses of the area. New modes of access that originate from technological advances might be permissible in the unit if they do not create unacceptable impacts upon the resources and uses of the unit.

Page 10, paragraph 1 - This paragraph attempts to summarize ANILCA Section 1110 access provisions and corresponding NPS regulations, but needs the following corrections:

The second sentence lists access methods used for traditional activities, "where such activities are permitted by this Act or other law." The sentence as written appears to be inconsistent with ANILCA and we request its deletion. Inclusion of this restriction in management of the area could virtually eliminate all legitimate activities except those adjacent to roads. We also request insertion of the ANILCA Section 1110 provision that such uses (listed access types) shall not be prohibited until after public notice, hearing in the affected vicinity, and a finding that such uses may be detrimental to the resource values.

Sentence 4 describes only one exception for the prohibition of airplane use for subsistence hunting, trapping, and fishing. The ANILCA legislative history indicates Congress' intent for additional exceptions on a case-by-case basis. Provisions for these exceptions exist in NPS regulations 36 CFR 13.45(b) for Alaska park units. We request an appropriate correction.

Page 10, paragraph 3 - The GMP states that an inventory will be conducted to identify areas traditionally used by motorboats, aircraft, horses or other pack animals, snowmachines, and off-road vehicles. The results of this inventory should be incorporated into the final GMP if available at the time of publication.

Page 10, paragraph 5 - If user conflicts do develop, "customary and traditional uses have priority over other uses." If off-road vehicles (ORV) have been used traditionally and are not detrimental to the values, continued use should be allowed. Until the procedures described in ANILCA Section 1110 have been followed, we cannot support the proposed restrictions.

The relationship between the proposed permit system and future regulatory proposals for restricting public access is confusing and should be clarified. We recognize the need for superintendent discretion regarding access, however the regulatory process should be the primary vehicle for instituting restrictions.

The proposed permit system may result in closure of large areas based upon a particular superintendent's philosophy. The resource users would not have appropriate procedures for consideration and appeal, and access could be unnecessarily restricted under this proposal. Access, including ORV use, is permitted for traditional activities including resource uses. Sections of ANILCA guarantee these traditional activities in Alaska even though not allowed by regulations or NPS policies in park units elsewhere. At a minimum we suggest revising the first sentence of paragraph 5 to read: "The use of ORVs will be permitted on designated routes and areas where their use has been customary and traditional, as provided by ANILCA Section 1110."

We request that if an inventory identifying specific traditional access routes is conducted (as referenced on Page 10, paragraph 4), this effort be coordinated with the State. Please note that the State provided preliminary lists of traditional access methods and means in the February 24, 1984 Resource Management Recommendations. Our major concern in limiting access is potential habitat degradation, as described in ANILCA Section 1110 which provides that access may only be limited if found to be detrimental to the resource values.

Pages 10-13 - The discussion should be modified to incorporate information provided on 17(b) easements and RS 2477 rights-of-way. The restrictions that state only local residents can use certain routes even if those routes correlate with 17(b) easements should be changed. 17(b) easements are for public use. Also, this section should acknowledge that the State has management authority on valid RS 2477 rights-of-way, and these rights-of-way will require cooperative management agreements and different treatment than areas of the NPPr where the State does not have valid existing rights.

Page 11, Proposed Chisana Area Access Map - We request that reference be made to the location of maps that identify the roads and trails that are too numerous to show at this scale. The Chisana Road corridor should be checked against the maps being compiled for the CRBAP. It appears there may be a difference between the two maps as to the location of the corridor. The CRBAP has also identified additional trails to those identified in the information provided by DOT/PF and included in this memo. NPS should be aware of, and include this additional information in the GMP. The discussion about the Chisana Trail should reference the corresponding discussion in the Affected Environment section recommended previously.

Page 13, paragraph continued from page 10, and paragraph 1 - Presently, there are areas within Wrangell-St. Elias NPPr where the access method has been primarily the use of ORVs. For example, the Kuskulana Trail is not an "established road" in that two wheel drive vehicles cannot travel along it; however, it is a historical and customary access route. We believe that regulations should be promulgated in a manner consistent with the requirements of ANILCA Section 1110.

The discussion at the top of this page should also state whether or not sport hunting and fishing is included in the reference to recreational use of ORVs.

Page 13, paragraph 2, line 10 - We suggest deletion of "local" in describing landowners. As written, it is not clear whether "local landowner" means residing locally or owner of local lands. This difference could be substantial in designation of access routes.

Page 13, paragraph 3 - We request traditional access and restriction procedures of ANILCA Section 1110 be referenced in the first sentence.

Page 26, last paragraph - The use of horses for pack or saddle stock within Wrangell-St. Elias NPPr is a traditional access method. Therefore, limiting this access method to designated trails should only occur if areas are identified as prone to environmental degradation due to trail use or overgrazing by pack stock.

Page 31, paragraph 2 - We request that RS 2477 rights-of-way be included among the topics identified as a subject for developing cooperative management agreements.

Once the changes outlined above have been made, the Land Protection Plan should be revised accordingly to address all private or other non-federal lands or interests within its authorized boundaries. The State recommends the following changes or additions regarding access.

Page 39 - The summary should acknowledge RS 2477 rights-of-way even though specifics of the corridors and actual acreages affected are not known at this time. A statement should also be included delineating the proposed method of protection of these corridors.

Page 47 - Table 2 should acknowledge that there is an undetermined amount of land that is or may be encumbered with RS 2477 rights-of-way or 17(b) easements. This could be added as a footnote to the table.

Pages 47-50 - A separate section should be included in this portion of the Land Protection Plan on RS 2477 rights-of-way and 17(b) easements.

Page 56, Easements - This section should also address non-exclusive use easements.

Page 63, Land Protection Priorities - The first paragraph should be expanded to reference RS 2477 rights-of-way and 17(b) easements. Additionally, it should address when and how a future tract-by-tract and trail-by-trail evaluation will be made, including how NPS intends to involve the State and the public in these decisions.

The section addressing RS 2477s should include a discussion of non-exclusive use easements as a method of protecting RS 2477 routes. The management intent for RS 2477s should be consistent with the new language proposed for inclusion in the GMP.

Pages 63-75, Recommendations - A separate section should be included in this portion of the plan for each of the following topics: Chisana Trail, other potential RS 2477 rights-of-way and 17(b) easements.

Pages 123-124, Transportation and Access - Although not specifically addressed, access to and use of existing materials sites within or adjacent to the Wrangell-St. Elias NPPr should not be restricted by the GMP. These materials sites are identified on the attached "Materials Site Strip Maps".

The GMP should specifically recognize the possible future needs for road realignment and sand & gravel extraction on those portions of the Richardson Highway, Tok Cut-Off, McCarthy and Nabesna Roads, which lay within or adjacent to the NPPr boundaries.

The GMP should also mention and address the various State maintenance activities that are performed inside the NPPr on the Nabesna and Chitina-McCarthy Roads.

- Page 124, paragraph 6 - The GMP references to the "Alaska Department of Highways" should be changed to the "Alaska Department of Transportation and Public Facilities (DOT&PF)".
- Page 124, paragraph 7 - ORVs are also a commonly used surface access method in both summer and winter, so we suggest that ORVs be listed also.
- Page 140, Impacts on User Experience, paragraph 1 - Here and numerous other locations within the plan refer to possible improvements of the State-owned Chitina-McCarthy Road. However, no mention is made of the cooperative multi-agency agreement currently in effect for activities involving the improvements, etc. for the road. That agreement should be described in the Consultation and Coordination section, including NPS intent to remain a participant.
- Page 151, #4 - The decision regarding the scenic highway study on the Chitina-McCarthy Road should be summarized.
- Pages 172-175, Access Provisions - The CSU units were established in ANILCA subject to valid existing rights, which include RS 2477 rights-of-way. These pages imply that NPS permits are required for use of RS 2477 routes. The sections referring to snowmachines, ORVs, dogs, pack animals, and RS 2477 should acknowledge that all valid RS 2477 rights-of-way are subject to State management authority including the identification of the types of vehicles allowed to use these routes. Unless a cooperative management agreement between the State and NPS is developed, it is inappropriate to state that users of any rights-of-way must comply with applicable NPS permit requirements.
- Page 172, Appendix G - The "No" in the Subsistence columns for ORV should be replaced by "Yes" with the appropriate footnote and the "No" in the Recreation column needs to be clarified. The "No" under Subsistence for Fixed-Wing Aircraft should be "Yes" with the appropriate footnote.
- Page 173, Access Provisions - Only the last sentence in exception D is consistent with ANILCA and regulations adopted for NPS lands in Alaska (36 CFR Part 13). The previous referenced executive orders and portions of 36 CFR are effectively amended or supplemented by ANILCA and its implementing regulations. Clarification and resolution is needed prior to adoption of the final GMP.
- Page 182, Restriction of Access - Please refer to our specific comment for pages 10-13.

Land Status Map (Back Pocket) - This or a similar map should include the various RS 2477 rights-of-way and 17(b) easements identified in the attachments. The map should also include any additional trails that can be found on the maps being compiled for the CRBAP. Additionally, the legend to this map should refer to a document that will be available at various NPS offices where the reader can find the exact location of the 17(b) easements on more detailed maps than those included in the plan. The Department of Interior manual (601 DM 4) requires that this information be made available. The legend to the map should also mention that there may be additional trails that might be asserted under RS 2477 in the future. It should also include a statement that since Native conveyances have not been completed, the total list of 17(b) easements in the NPPr is not yet known.

Land Protection Priorities Map (Back Pocket) - This map should include or reference 17(b) easements and RS 2477 rights-of-way and the priority for protection of these easements and rights-of-way.

VISITOR USE AND FACILITIES

Page 3, paragraph 1, line 5 - We suggest that "... and facilities that will be provided by the ..." be changed to "... and facilities that are proposed by the ..." unless NPS intends all developments to be owned by NPS.

Page 3 - The statement "... long-term potential for high visitation rates" contradicts the statement made on Page 3, paragraph 1, line 12, which states the plan is based on "... low anticipated visitation levels" If this plan is being formulated for a five to ten year period (as indicated on Page iii, last sentence), the sentence should read "Despite its accessibility, there is a low anticipated visitation level".

The statement "... Wrangells already has experienced a relatively high level of use" implies that use has increased to relatively high levels because it is now a park/preserve. We question whether "relatively" means in relation to other parks in the State or in relation to the amount of use previously received. We do not find data to support the implication that visitor use has increased dramatically since 1980. We suggest the following revision: "Because of the State highway system and the Park's easy access by the State's population, use has continued to be higher than in most other national park systems in Alaska."

The sentence "At the present time, only limited visitor facilities and services ..." implies that the demand by park visitors for facilities and services exceeds the supply. The following sentence would be more appropriate: "At the present time, visitor facilities and services are adequately provided by NPS and the private sector." Throughout the plan NPS seems to be generating visitor use by creating services in anticipation that subsequent increased uses may occur.

Page 7, Information/Interpretation - The first sentence of the paragraph indicates where information can be obtained, then the next sentence says such information is often not available. We suggest the first sentence of the paragraph be clarified by insertion of the word "occasionally" between "can" and "get".

Page 8, paragraph 6 - The first sentence says signs will be minimized (we assume so as not to impair the wild character), then the paragraph discusses wayside exhibits, bulletin boards, etc. Page 8, paragraph 3 also discusses additional wayside exhibits. This inconsistency in management intent should be clarified.

If there is a different intent or criteria for signs inside the boundaries, then this too needs clarification. We also request that the plan acknowledge that the interagency task force dealing with the Chitina-McCarthy Road will be consulted on any proposals for roadside signs and exhibits.

Page 13, General Development - The GMP does not present adequate data to support the position that existing facilities are inadequate for visitor use during the life of this GMP. We suggest that the second sentence begin with "Some ..." rather than "Many ...".

Pages 15-16, Draft General Development Plan (MAP) - It is difficult to interpret the GMP's proposals for development at the areas indicated on the map. Various facilities listed are not adequately described in the GMP, such as:

1. ranger station
2. operations base
3. park headquarters
4. visitor center
5. visitor contact center
6. information wayside
7. information/interpretation wayside
8. interpretation wayside
9. cooperative wayside
10. storage cache

Different terms seem to describe identical types of facilities. We request that NPS clarify and provide more specific definition of the categories of facilities.

Pages 14 and 17, - The descriptions of proposed facilities in the various areas include intent to acquire additional lands not presently within Wrangell-St. Elias NPPr boundaries upon which to construct facilities. We request that the priorities granted in Title XIII for the private sector to provide facilities be pursued prior to acquiring additional lands. We question whether NPS is pursuing full use of existing facilities available from the private sector and suitable service lands for construction sites. We suggest that the final plan indicate that NPS has fully pursued alternative options as required in Section 1306 of ANILCA.

Page 17, paragraph 4 - Traditional and customary use of the May Creek area by the public will also continue. If NPS develops facilities there will be an unavoidable demand that their use be available to the public as well as for emergency purposes, requests for information, etc. We request that NPS address how it intends to respond to this demand.

Page 17, Slana-Nabesna Area - No data are presented to support the need for any public facilities or administrative sites along the road. There is an implication that private property is being used for access sites and camping but no supporting information is included.

Page 34, last paragraph - We suggest this management intent also be clearly included on Pages 7-8 and 13-14.

Page 119, Population and Employment - It seems misleading to attribute a 70.7 percent population increase over the last ten years to Valdez and Glennallen. Valdez's population increased 200 percent, from 1,005 to 3,079 people, while Glennallen went from 363 to 511, an increase of 41 percent. We would recommend explanatory wording such as: "Most of this increase was in the community of Valdez, and to a lesser extent in Glennallen, and is generally associated with the Trans-Alaska pipeline."

We also note that Slana and Chitina should be included in the list of principal small communities.

Page 129, paragraph 1 - This paragraph stresses the possibility of increasing visitor use of Wrangell-St. Elias NPPr. By comparing it to Denali, there is an implication that more visitor facilities and services are needed to adequately provide services for an as yet unproven need.

- Page 129, paragraph 5 - A large percentage of Wrangell-St. Elias visitors are also likely to be at the visitor center on the Richardson Highway, which is not in the unit.
- Page 129, paragraph 6 - On Page 7, paragraph 1, NPS states that as many as 48,000 to 67,000 visitors are predicted for the next decade. On Page 129 the lower figure is dropped resulting in an apparent increased justification for visitor facilities and services.
- Page 129, paragraph 7 - "Visits" needs to be defined. Most park planning is based on expected number of visitors, but a visit does not necessarily mean there is a demand for additional services. The NPS should consider that one reason the park/preserve has received such "heavy use for a newly established area in Alaska" is that it is still relatively primitive, and the users want this type of experience. We also question the statement that historical use data is not available. Alaska Journal, Alaska Geographic, and Alaska Magazine have had numerous documentations of historical uses of the area.
- Page 138, Impacts on User Experience - The statement in the first paragraph "Overall, the plan would not meaningfully change the user experience from existing conditions" underestimates the impacts on existing user groups. A remote NPS ranger cabin in a mountain valley occupies only a few square feet of ground but may impact those pursuing a wilderness experience. A visitor center and adjacent parking area may only involve developing a few acres, but many thousands may be impacted because of use restrictions within a certain zone to prevent conflicts with viewers.
- Page 138, Impacts on Area Residents - "NPS facilities and user numbers [under the preferred alternative] would not be much greater than existing conditions." This contradicts all previous discussions of increasing visitors.
- Page 143, paragraph 3 - In numerous locations of the text, there are implications that private enterprise would be inferior in providing visitor services in comparison to NPS facilities. The statement "Thus, the quality of the visitor experience might not be optimal at these facilities." should be substantiated or deleted from the text; similar implications should be substantiated or removed from other locations in the text.

CABINS AND SHELTERS

Page 14, paragraph 2 - In previous paragraphs in this section, NPS supports increased visitor and support facilities. In this paragraph, however, NPS intends to prohibit tent platforms, shelters, and other temporary facilities. This is contradictory and does not seem justified. For example, this implies that a hunter in the Preserve cannot erect a temporary shelter or conceivably even use a tent. As hunting is allowed on preserve lands, temporary shelters (tents, lean-tos, etc.) that are a normal part of camping should not be restricted. Although the incomplete quote on lines 3 and 4 is from ANILCA Section 1316(b), the legislative intent was not to limit camping. To resolve our concern we propose the following sentence be inserted between existing sentences on line 8. "This is not intended to limit the use of tents that are normally a part of backcountry outings."

Given the amount of use the area has historically received, we disagree that facilities and equipment related to the taking of fish and wildlife is a "significant expansion" and we oppose the proposed prohibition.

Page 18, paragraph 4 - The plan proposes that, "Selected cabins will be maintained as shelters." We request clarification regarding permitted cabin usage and what will happen to existing cabins which are not selected. We also request a detailed description outlining criteria by which cabins will be designated as shelters, maintenance responsibilities of those cabins, who will make the designations, allowances for public input and review, and discussion of policy related to usage and ownership of other cabins not selected, their status, and future use. We desire assurance that NPS is implementing a cabin policy consistent with the recommendations adopted by the Alaska Land Use Council.

NATURAL RESOURCE MANAGEMENT

Page 5, Resource Management - The last two sentences of this paragraph should be revised as follows: "The Park Service will cooperate with agencies responsible for park/preserve resources. Should the Park Service direct or cooperate with universities, organizations, and individuals who are concerned with the resources? What resource management actions are incompatible with the purposes of the park/preserve?" The revision is consistent with the Master Memorandum of Understanding (MOU) between NPS and the Alaska Department of Fish and Game (ADF&G) included in Appendix J, ANILCA Section 1314, and Page vi (paragraph 5) of the draft plan which specifically states intent to manage resources in "... cooperation with the State of Alaska." Therefore, the question of whether or not NPS should cooperate with agencies is not appropriate.

Page 26 - Pages 24 and 25 of the draft plan stipulate striving to perpetuate a "natural environment or ecosystem." Wildfires have been a natural part of that ecosystem for centuries and are recognized as an important factor in providing habitat (vegetation) diversity within the Wrangell-St. Elias NPPr. Fires should not be aggressively attacked except where loss of life or property is involved. The first paragraph under Vegetation states that naturally caused fires will continue to influence the natural ecosystems, yet in the next paragraph, a plan for full suppression is suggested for the area south of the Bagley Icefield until a fire management plan is adopted. This approach seems in conflict with the "natural environment or ecosystem" approach. We support a less-stringent interim approach to fire control in the area to the extent that naturally occurring wildfires be allowed to burn uncontrolled throughout most of the area and that, if conditions warrant, the possibility of prescribed burns for increasing diversity and abundance of wildlife species not be prohibited.

It appears that NPS may be formulating a fire management plan for the area south of Bagley Icefield separate from the interagency fire planning process. We request this be clarified in paragraph 2 to reflect continued interagency cooperation in formulating a fire management plan for the area.

Page 88, paragraph 3 - "Leaking 55-gallon drums ..." may have potentially serious consequences with habitat degradation as well as health hazards. The GMP should address this hazard under any alternative, not just Alternative B. Regardless of which alternative is selected, action should certainly be taken to identify the contents. We question why it is perceived as a human health hazard but not of consequence as an environmental contaminant affecting water, fish, or wildlife resources. (This supports our concerns that NPS appears to have developed management alternatives that are primarily visitor oriented rather than directed at habitat and wildlife.)

FISH AND WILDLIFE

Page 8, paragraph 6 - Literature presented to advise visitors of legitimate uses such as hunting within the park/preserve should also include trapping. We suggest "trapping and" be inserted between the phrases "... literature advising visitors that ..." and "... sport hunting occurs in the preserve." Further, the draft plan implies that subsistence activities will occur only in the Park. We request clarification that subsistence uses occur within both the Park and Preserve.

Page 14, paragraph 2 - Given the amount of use the area has historically received, we disagree that facilities and equipment related to the taking of fish and wildlife is a "significant expansion" and we oppose the proposed prohibition.

As requested in the State's Resource Management Recommendations for Wrangell-St. Elias NPPr, clarification of ANILCA Section 205 is needed prior to making the referenced determination. Because user intensity varies from year-to-year, depending on economics and volume of the "run," a multiple rather than single year assessment needs to be completed to better represent the complexity of fisheries harvests. We request an opportunity to work with NPS in completion of this assessment and cooperatively develop the proposed determination.

Page 24, paragraph 4 - The statement regarding the limitations of habitat manipulation is not consistent with the ADF&G/NPS MOU and the State's Resource Management Recommendations. We request that NPS reconsider its intent to propose independent species plans and their prohibition on habitat or management options. Our proposed language for page 25, Fish and Wildlife provides clarification and requested revisions, consistent with ANILCA, the MOU, and the Department of the Interior Fish and Wildlife Policy: State and Federal Relationships.

Page 25, paragraph 1 - This paragraph incorrectly implies that there has been little human activity within Wrangell-St. Elias NPPr. However, considerable consumptive utilization of the area's resources has occurred for many years including intensive harvests of fish and wildlife resources over the past 100 years. We request that the GMP also recognize Congressional intent to provide for human activities throughout the Wrangell-St. Elias NPPr and the role of man as an integral part of the ecosystem.

Page 25, Fish and Wildlife - We request that the GMP acknowledge that Congress mandated NPS to provide opportunities for uses of the Wrangell-St. Elias NPPr resources. We also request assurances that trapping and recreational hunting will be continued uses of Preserve resources. We therefore suggest the first sentence be changed to read: "Sport fishing and subsistence uses, including hunting and trapping, in the Park and hunting, trapping, and fishing in the Preserve are"

Page 25, last paragraph - The ANILCA legislative history also recognizes man's role as a part of the natural environment including uses of the fish and wildlife resources. The quoted statement is incomplete and not necessarily a congressional policy statement. Prohibiting any form of manipulative management is an inconsistent interpretation. The congressman's discussion clearly applies only when manipulations are "to achieve maximum utilization of natural resources" and when solely "for the purpose of maintaining subsistence uses." However, we agree that careful evaluation of resource uses and conditions should precede any new manipulation and we request this management intent be modified accordingly.

Page 26 - The prohibition of any fisheries improvement activity is not consistent with ANILCA, NPS policy, and the NPS/ADF&G MOU. We also request that the GMP discuss current fisheries improvement programs and the status of existing fisheries populations in the Wrangell-St. Elias NPPr.

Existing sport fishing opportunities may become severely limited in the near future without supplemental stocking programs. For example, if artificial stocking of eggs, fry, and brood stock is prohibited, the most popular sport fishery in Wrangell-St. Elias NPPr will be eliminated. Since 1968, the sport fishery at Van, Sculpin, and Strelna Lakes has been maintained by stocking rainbow trout and coho and king salmon. The ADF&G surveys indicate that in 1983, an estimated minimum of 2,300 angler-days were expended to harvest 4,200 land-locked silver salmon and 500 rainbow trout in Van, Strelna, and Sculpin Lakes. The native species in these lakes consist of sculpin in all three lakes plus Dolly Varden in Van Lake. The Dolly Varden population is extremely small; the last recorded catch was made in an ADF&G test netting operation in 1978. The physical and biological characteristics of Van Lake are apparently not adequate to maintain a fishable population of Dolly Varden. Further, because there is no apparent physical connection exists between Van Lake and other Dolly Varden waters in the area, we suspect that Dolly Varden may have been artificially introduced. Therefore, we believe that continuation of the existing program will have an insignificant impact on the natural fish populations of the NPPr while maintaining an important recreational resource.

Other concerns regarding fish populations and uses in the Wrangell-St. Elias NPPr area were provided to NPS in the February 24, 1984 State of Alaska Resource Management Recommendations. We requested that NPS address these concerns and coordinate related management planning with ADF&G. This section of the GMP is inadequate due to failure to discuss the status of existing fish populations, their

uses, or ADF&G management concerns. Consequently, we request at a minimum that the following updated information (replacing the Fisheries section, pages 19-21 of the Recommendations) be addressed in the final GMP. We also request acknowledgement that opportunities for participation with NPS will be provided in related management decisions:

"Recreational angling opportunities within Wrangell-St. Elias NPPr boundaries are limited. We request that NPS support the State's existing recreational fishing program and assist in achieving identified sport fisheries objectives through cooperative planning.

"At the present time, ADF&G [as discussed above] is stocking fish in Van, Sculpin, and Strelna Lakes all located along the Chitina-McCarthy Road. These lakes could satisfy a substantial increase in recreational demand. The present road access to Sculpin and Van Lakes is in private ownership. The present owners have allowed unrestricted access to the lakes (although fees are charged to access Sculpin) and are expected to do so in the future. Strelna Lake access is along a quarter-mile trail that crosses native allotments. Each of the three lakes are also accessed by floatplane.

"Also along the Chitina-McCarthy Road are the following fisheries: Crystal Lake, located about one mile from Lakina River bridge, has a good Dolly Varden population. Current access allows only limited use. Long Lake provides recreational angling for sockeye salmon, coho salmon, grayling, Dolly Varden, lake trout, and burbot. Long Lake is located immediately adjacent to the road and is also accessible by floatplane. Lou's Lake is situated about one mile off the road and is near Sculpin Lake. It contains coho salmon and grayling and provides limited recreational angling opportunities due to its lack of an access trail. Numerous small lakes in the Dan and May Creeks area contain grayling, Dolly Varden, and burbot. These lakes are along an old road which has been isolated due to collapse of several bridges in the area. Excellent recreational fishing is available in this area. An old airstrip located near May Creek may be usable.

"Foot access to Little Billy and Billy Lakes is available along a one-mile trail starting from the Chitina-McCarthy Road, approximately 8 miles east of Kuskulana River bridge. Trail improvement allowing continued access would provide recreational angling opportunities for grayling.

"Louise Lake, in association with several smaller unnamed lakes south of the Chitina River, provides recreational angling for burbot and grayling. Access methods to this group of lakes include floatplane, foot or ORV. A trail leads from the landing area at Jake's Bar on the Tana River to the Bremner mine. At least one cabin on Louise Lake is used by hunters and trappers during the winter months.

"On the Nabesna Road, there are several lakes which provide recreational angling for grayling, burbot, and lake trout. Most notable are Big (Lower) Twin, Little (Upper) Twin, Long, and Jack Lakes. Rainbow trout are stocked in Rock Lake. These lakes are accessible from the road system, and Jack and Long Lakes are accessed by floatplane. Grayling egg takes occur in the Jack Lake system and grayling are subsequently replanted.

"Copper and Tanada Lakes are two large lakes located within Wrangell-St. Elias NPPr which provide recreational angling for lake trout, anadromous sockeye salmon, burbot, and grayling. In addition, a significant natural kokanee population exists in Copper Lake, though not common or abundant elsewhere in Alaska. Tanada Creek has a small population of king salmon. Copper and Tanana Lakes are reached by floatplane and an ORV trail during summer and winter months. Snow-machines commonly use the trail during winter.

"Within the Yukon/Tanana watershed of Wrangell-St. Elias NPPr, fisheries surveys and research have not yet been completed. The following systems and lakes are known to contain fish species: Chum salmon are distributed in the Chisana River downstream of Sheep Creek and additional chum salmon spawning areas occur just downstream of the confluence of Sheep Creek. Lake trout are recorded in Beaver Lake, Beaver Creek, Ptarmigan Lake, Ptarmigan Creek, and Rock Lake. These systems may have potential for future fisheries studies or improvement projects.

"The ADF&G has indicated concern regarding a proposed fish pass and support facilities located at Tebay River Falls, approximately 1.1 km downstream from the outlet of Lower Tebay Lake. This fisheries improvement project has been proposed to allow passage of indigenous anadromous chinook salmon and introduced sockeye salmon over Tebay River Falls to Tebay Lakes. Access for this area is by floatplane to Tebay Lakes, then by foot down the existing trail to Tebay River Falls. A second project involves a Tebay Lakes inventory to determine the feasibility of stocking Tebay Lakes with sockeye fry. This feasibility study involves detailed limnological analysis to determine nutrient availability and primary and secondary productivity characteristics of Tebay Lakes.

"The NPS, U. S. Fish and Wildlife Service (USFWS) and ADF&G have initiated a cooperative study of steelhead in the Chitina River system. This study's purpose should be described in the GMP as well as the status of existing steelhead and lake trout populations in the Tebay and Hanagita portions of the system.

"Anadromous fish streams throughout the State have been cataloged by ADF&G. These catalogs are available in the ADF&G Anchorage office and NPS is encouraged to use them to update this GMP. The ADF&G also welcomes NPS participation in the annual updating of these catalogs.

"The ADF&G has identified the following salmon fishery research needs: The opportunity to conduct scientific sampling and investigations of salmon, salmon spawning, rearing, and migratory habitat in several systems within Wrangell-St. Elias NPPr, such as past and future counting weirs at the outlet of Tanada Lake.

"We request that NPS cooperate in conducting a statewide assessment of commercial fisheries occurring within NPS units. In particular, we request this plan address commercial fishing in relation to ANILCA Section 205. Because user intensity and locations of fisheries have changed over historic time, depending on economics and volume, a multiple rather than single year assessment needs to be done to determine 'beyond the level of such use during 1979'."

The Resource Management Recommendations also request cooperation with NPS in resolving several wildlife issues and resource needs. We would appreciate opportunities to participate in development of associated management intent for inclusion in the final GMP, preferably through cooperative planning efforts.

We request that NPS cooperate with ADF&G in designing survey and census procedures to adequately assess the status of wildlife populations. For example, there are presently no census or survey techniques for bears that produce accurate results without using visual tags or collars. Study design may include marking sufficient bears to produce reliable estimates of the population size, distribution, and movements. This information may be critical in the future in determining the number of bears in Wrangell-St. Elias NPPr.

Several other resource issues identified in the updated State's Resource Management Recommendations (not in order of priority) for possible studies should be included as follows:

Mentasta Caribou Herd: caribou calf, yearling, and adult mortality studies and caribou range studies in the area utilized by the Mentasta herd.

Wrangell Mountains Moose Herd: moose calf, yearling, and adult mortality studies and a census to obtain density estimates.

Wrangell Mountains Wolf Population: wolf densities and predation rates.

Wrangell Mountains Brown Bear Population: research on brown bear populations to determine density estimates and predation rates.

Wrangell Mountains Bison Herds: range studies to determine range carrying capacity for bison and to document long-term effects on their habitat, interactions with native fauna, and predation rates of wolves and bears.

Wrangell Mountains Sheep Herd: habitat and disease investigations and mortality studies.

Mountain Goats: movement and mortality studies.

Malaspina Forelands Coyote Population: food habits and interspecific relationships.

Malaspina Forelands Canada Goose Population: identity study.

Malaspina Forelands Brown Bear: density and food habits studies.

Chisana Caribou Herd: movement and concentration patterns and limiting factors.

The expense of conducting fish and wildlife surveys and research in Alaska requires cooperation between agencies. Such cooperative studies benefit both agencies, the resources, and public and are usually conducive to better working relationships. We suggest that the plan emphasize a commitment to these efforts.

Page 51, items 1 and 2 - Earlier in the plan, NPS recognizes ADF&G responsibility to manage fish and wildlife resources within and adjacent to Wrangell-St. Elias NPPr. The first two paragraphs on this page imply that any resource uses and wildlife management activities adjacent to park/preserve lands would be subject to a NPS determination of compatibility. The ADF&G is equally concerned with the

health of populations of fish and wildlife both within and adjacent to any conservation system unit in the State. To avoid the incorrect implication above, we suggest that NPS combine items 1 and 2 into a single item to read "Activities that result in a substantial or irreversible affect on wildlife populations or their habitat that normally use portions of the park/preserve."

Page 53, paragraph 1 - We suggest that mention of beluga whales be omitted as the species is not known to occur here with any regularity.

Page 71, paragraph 1 - The "prime mountain goat habitat" is almost entirely within designated park lands. Only a small proportion of goat range east of Icy Bay is not designated. This is the only portion of the ADF&G's Game Management Unit 5B where non-locals may hunt goats. Goats have been managed by ADF&G and recreational hunting is a continuing use of the resource. In the February 24, 1984 State of Alaska Resource Management Recommendations provided to NPS, several boundary adjustments and land status changes were requested, including the following which we believe more accurately represents uses of the resources in this location: "The ADF&G requests that the Icy Bay region, specifically the Chaix Hills complex, be removed from Wrangell-St. Elias NPPr or changed to Preserve status. Over 90 percent of the goats harvested in Unit 5 comes from this area. Only a very small portion of one ridge is open to sport hunting, concentrating pressure, while the remaining area cannot be hunted. Additionally the main access point to the ridge is privately controlled, discouraging unguided hunters." We are concerned that this is not addressed in this section nor discussed during development of this plan.

Pages 100-110 - This section briefly describes "Wildlife" in a page of text but fish values are omitted. This is a significant oversight which should be corrected in the final plan. Please see our related comments for pages 25-26.

Page 110, paragraph 1 - Moose are listed as occurring anywhere below 6,000 feet elevation. Research throughout most of interior Alaska has shown that areas above 4,000 feet are rarely used by moose. We suggest that that reference to moose using areas below 6,000 feet be changed to 4,000 feet. This is consistent with the vegetation description (Page 106), indicating alpine tundra exists between 3,000 and 5,000 feet. Above 5,000 feet elevation, NPS indicates that the dominant ground cover consists of rocks, snow and ice, which does not constitute favorable moose habitat.

Page 110, paragraph 3 - It is unclear whether "lower reaches" means lower elevations or southern portions.

Wolverines are frequently found at extremely high elevations so, if the implication is that they occur only in the lower elevations, it should be changed. All the species listed occur throughout Wrangell-St. Elias NPPr. "Martins" should be spelled "martens" in this case.

Pages 111 and 112, MAPS - The wildlife maps are very difficult to interpret and appear to be inaccurate. We recommend that they be deleted unless significantly improved.

Page 124, paragraph 7 - ORVs are also a commonly used surface access method in both summer and winter, so we suggest that ORVs be listed also.

Page 125, paragraph 5 - Nonresidents presently do not need guides for black bear hunting. Line 3 should be corrected "... sheep and grizzly/brown bears." This paragraph further implies that hunting guides are unregulated. We request that NPS clarify the Guide Board procedures for regulations and conduct.

Page 126, paragraph 3, lines 2 and 3 - Although many ADF&G employees have peace officer status, they are not protection officers. The Fish and Wildlife Protection Division of the Alaska Department of Public Safety has primary responsibility as protection officers.

Page 131, Hunting Use Map - No information is given on the source and methodology used in producing the mapped data. No indication is given of how "moderate" and "heavy" uses are gauged. Without some explanation, these data seem questionable. Maps recently completed by the Division of Subsistence, ADF&G, provide information on additional areas used, although they provide no data on use intensity. Use intensity can be derived from ADF&G harvest ticket required reports from hunters. Consistent with subsistence information available we request the following specific corrections to the map: an extension of the heavily used Malaspina Forelands hunting area westward along the shoreline for a distance of approximately one-half inch; a moderate use hunting area should be indicated in the west shore of Icy Bay, inside the Park boundary, including the shoreline to several miles inland from the southern boundary north approximately five miles (on the map this would be drawn as a line around the corner of the Park boundary just opposite of "y" in "Icy Bay").

Here and throughout the GMP, wherever the Malaspina Forelands are mentioned as an important area for hunting and fishing, Icy Bay should be included as well; the entire area from Yakutat Bay along the Forelands to Icy Bay is considered as a nearly continuous hunting and fishing area by Yakutat residents.

Page 137, Environmental Consequences - Throughout this section, the listing of exact acreage that will be disrupted by each alternative should be qualified as rough estimates. For example, under Impacts on Natural Resources only 14 acres are predicted as lost wildlife habitat. Animal populations respond to development and often change area-wide use patterns, possibly decreasing overall carrying capacity. Another example of potential significant impact is provided on Page 113 where NPS selects the only identified high density sheep area as the exact area for constructing two visitor centers.

Page 137, Impacts on Natural Resources - We object to the statement (paragraph 2) that improved administrative facilities improve protection and management of natural resources. We also object to these proposals of boundary changes justified as protecting resources. Those proposals will not offer further habitat protection, only reduce allowed uses.

Subsistence

Page 54, paragraph continued from Page 53 - The sentence "their lifestyle is generally one they have chosen rather than inherited ..." should be amended. Many Yakutat residents who presently live adjacent to the Park and Preserve have in the recent past lived within it. Particularly the Tlingit Indians of Yakutat have not "chosen" a "lifestyle" but rather inherited a subsistence livelihood that is critical to their cultural and economic survival. The Yakutat Tlingit historically have occupied numerous villages from Cape Suckling to Cape Fairweather. They continue to utilize the Malaspina Forelands and both shores of Icy Bay for hunting, fishing, and gathering. This paragraph should be amended to reflect the difference between these users of the Park and Preserve and those to whom the paragraph seems to address.

We also suggest the sentence on lines 5-7 read: "Most residents partake in various subsistence activities which are usually supplemented by a cash income (source: ADF&G - Subsistence Division)."

Page 61, Sociocultural Impacts - The ANILCA does not limit its protection of traditional way-of-life and subsistence activities to "present residents." Man's role in the ecosystem was acknowledged by Congress and recognized as involving dynamic and evolving uses.

- Page 123, Subsistence Uses and Rural Resident Lifestyle, paragraph 3 - The State suggests the same wording as recommended above for page 54. Subsistence use of Icy Bay is currently not noted in the GMP. We also request the section be amended to include recent subsistence research in Yakutat. Field work conducted by Mills and Firman from November 1984 to May 1985 documents the following subsistence activities of Yakutat residents on lands in or immediately adjacent to the Park and Preserve. The Malaspina Forelands are heavily used by Yakutat residents for subsistence hunting of moose, waterfowl, seal, and bear, for trapping and commercial salmon fishing. The Icy Bay area shows continued significant subsistence use by Yakutat residents for moose, waterfowl, seal, and goat hunting, trapping, and commercial salmon fishing.
- Page 123, paragraph 4 - After "... purposes" add "Wild berries and plants are also gathered in substantial quantities." Household surveys by ADF&G, Division of Subsistence, in several communities within the resident zone indicate per capita vegetation harvests almost universally exceeded per capita harvests of waterfowl and snowshoe hare, which are listed as important quantitatively.
- Page 123, paragraph 6 - When the text addresses residents within the park/preserve, the judgement that subsistence hunting and trapping supplements income appears debatable. It may well be that the opposite is true if levels of resource harvests are given a cash value and compared to actual cash income. The ADF&G recommends replacing "means of supplementary income" with "source of food."
- Page 126, User Analysis - The ADF&G, Division of Subsistence, has produced Technical Papers 37 and 75, the Dipnet and Fishwheel Fisheries of the Copper River, 1982, and Copper Basin Caribou: A Research Update, respectively, to describe participants in the Copper River salmon fishery and users of the Mentasta caribou herd. In addition, the recently published Technical Paper 107, The Use of Fish and Game by Communities in the Copper River Basin, Alaska: A Report on a 1983 Household Survey also describes users of resources by a majority of those people within the resident zone of the Wrangell-St. Elias NPPr. Copies of all three reports have been provided to park headquarters in Copper Center. We request that these reports be referenced and summary information correctly included.

In Summary

As a whole, the GMP does not adequately address management intent, direction, issues, or programs regarding fisheries and wildlife. Several implications do not seem consistent with current programs, policies, understandings, or the intent of ANILCA.

We therefore request that the first four paragraphs under Fish and Wildlife (page 25) be deleted. As written, management intent is not clear and numerous issues remain unresolved. We request adoption by the NPS of the following language in this section to resolve many concerns and clarify management intent and policies:

"The National Park Service (NPS) is mandated by the Alaska National Interest Lands Conservation Act (ANILCA) and other laws to protect the habitat for, and populations of, fish and wildlife within the Park and Preserve, ANILCA Section 201(m). The NPS management of fish and wildlife will generally consist of management of the human uses and activities which affect such habitat and populations, rather than the direct management of fish and wildlife resources.

"The Alaska Department of Fish and Game (ADF&G), under the constitution, laws, and regulations of the State of Alaska, is responsible for the management, protection, maintenance, enhancement, rehabilitation, and extension of the fish and wildlife resources of the State. Within conservation system units, including Wrangell-St. Elias National Park and Preserve, State management of fish and wildlife resources is required to be consistent with the provisions of the ANILCA and NPS policy.

"The NPS and the State of Alaska will cooperate in the management of the fish and wildlife resources of the park and preserve. A memorandum of understanding between the NPS and the ADF&G (see Appendix J) defines the cooperative management responsibilities of each agency. The 'Department of the Interior, Fish and Wildlife Policy: State and Federal Relationships' (43 CFR 24) further addresses intergovernmental cooperation in the protection, use, and management of fish and wildlife resources. The closely related responsibilities of protecting habitat and wildlife populations and providing for fish and wildlife utilization require close cooperation of the ADF&G, the NPS, and all resource users.

"Trapping, sport and subsistence fishing and subsistence hunting are allowable uses in the Park and hunting, fishing, and trapping are allowable uses in the Preserve (ANILCA Sections 1313 and 1314, and applicable state law). The ANILCA requires that such harvest activities remain consistent with maintenance of healthy populations of fish and wildlife in the preserve and natural and healthy populations in the park, ANILCA Section 815(1). Congress recognized that programs for the management of 'healthy populations' may differ between the NPS and the U. S. Fish and Wildlife Service due to differences in each agencies management policies and legal authorities (Senate Report 96-413, p. 233).

"The State of Alaska, through the Boards of Game and Fisheries, is responsible for establishing fishing, hunting, and trapping regulations for the park and preserve, consistent with provisions of the ANILCA. The NPS will cooperate with the State wherever possible in establishing those regulations in a manner that is compatible with park and preserve management goals and objectives.

"The ANILCA authorizes the State to manage the taking of fish and wildlife for subsistence purposes on federal lands if a State program is implemented which satisfies certain criteria in the ANILCA Title VIII. Such a State program has been implemented.

"A subsistence resource commission has been established for the park in accordance with Section 808 of the ANILCA. The commission is charged with devising and recommending a subsistence hunting program for the park. Submission of a program is anticipated in (year).

"Customary and traditional subsistence use is considered to be a natural human role, as indicated by the legislative history of the ANILCA: "The NPS recognizes, and the Committee agrees, that subsistence uses by local rural residents have been, and are now, a natural part of the ecosystem serving as a primary consumer in the natural food chain. The Committee expects the NPS to take appropriate steps when necessary to insure that consumptive uses of fish and wildlife populations within the NPS units not be allowed to adversely disrupt the natural balance which has been maintained for thousands of years (Senate Report 96-413, p.171).

"Within the preserve units the NPS ' . . . may designate zones where and periods when no hunting, fishing, trapping, or entry may be permitted for reasons of public safety, administration, floral or faunal protection, or public use or enjoyment', ANILCA Section 1313. Additionally, the NPS ' . . . may temporarily close any public lands . . . , or any portion thereof, to subsistence uses of a particular fish or wildlife population only if necessary for reasons of public safety, administration, or to assure the continued viability of such populations', ANILCA Section 816(b). Except in emergencies, all such closures must be preceded by consultation with appropriate State agencies. If it becomes necessary to restrict the taking of populations of fish and wildlife in the park or preserve, non-wasteful subsistence uses are accorded priority over the taking of fish and wildlife for other purposes.

"The State has developed resource management recommendations containing management guidelines and objectives that were generally developed for broad regions. Therefore, some of the guidelines and objectives may not be applicable to the park and preserve. The master memorandum of understanding indicates that NPS will develop its management plans in substantial agreement with State plans unless State plans are formally determined incompatible with the purposes for which the park/ preserve was established.

'Habitat and animal population manipulation will not be permitted within the park and preserve except under extraordinary circumstances and when consistent with the NPS policy. Congressional intent regarding this topic is presented in the legislative history of the ANILCA: 'It is contrary to the NPS concept to manipulate habitat or populations to achieve maximum utilization of natural resources. Rather, the National Park System concept requires implementation of management policies which strive to maintain the natural abundance, behavior, diversity, and ecological integrity of native animals as part of their ecosystem, and the Committee intends that the concept be maintained.' (Senate Report 96-413, p.171)

"In recognition of mutual concerns relating to protection and management of fish and wildlife resources, the NPS and the ADF&G will continue to cooperate in the collection, interpretation, and dissemination of fish and wildlife data. The NPS will continue to permit and encourage the ADF&G to conduct research projects that are compatible with the purposes of the park and preserve. The NPS will ensure access for state officials for purposes of conducting research and managing fish and wildlife resources.

"The park's informational programs will inform visitors about the occurrence of human use activities in the park and preserve in order to minimize user conflicts. Information will also be provided about activities that can result in disturbance of wildlife and their habitat.

"The NPS Resources Management Plan for the park and preserve will be developed and subsequently revised in cooperation with the State and is anticipated for initial completion by (date). The plan will be reviewed by the public and any major change in direction, philosophy, or goals is subject to public involvement requirements of the ANILCA Section 1301. The plan will describe in detail the scope of scientific research and resource management methods that will be cooperatively employed so that the NPS has a better understanding of park and preserve resources for utilization in future resource-related decision-making. The highest priorities of the resource management plan over the next 5 to 10 years follow." [We request insertion of the list currently located in Appendix C along with appropriate discussion.]

TIDE AND SUBMERGED LANDS

Several additions or changes should be made to the GMP to more adequately address the State's management authority over tide and submerged lands.

The GMP should include a section on tide and submerged lands. We suggest the following paragraph:

All tide and submerged lands in the preserve which vested in the State of Alaska at Statehood are under the jurisdiction of the State of Alaska. The NPS will submit proposals for the management of these lands to the appropriate State agency.

Pages 47-50 - A section should be included titled Tide and Submerged Lands. Appropriate portions of the above paragraph could be included in this discussion.

Page 73 - A fourth item (under State ownership) should be added to address "tide and submerged lands". The Justification discussion should be revised accordingly.

NAVIGABILITY

The GMP proposes to work with the State to close the beds of navigable rivers in the NPPr to mineral location or leasing. The State is willing to consider this and other proposals but only upon application by NPS to the Department of Natural Resources Division of Land and Water Management.

The Affected Environment chapter of the plan should include a section titled Navigable Waters where the current and historical use and the navigability status of the various waterways in the NPPr is indicated.

The GMP should include a section titled Navigable Waters. We suggest inclusion of the following paragraphs:

At the time of Statehood, the State received ownership of the beds of navigable waters to the "ordinary high water mark". At present the (name of waterways) have been determined navigable. Navigability determinations have not been made on other rivers within the NPPr.

The NPS will seek cooperative agreements with the Department of Natural Resources concerning the management of submerged lands under navigable waters. NPS will make requests for the use of these lands to the appropriate State agencies.

Page 39 - The summary should include a footnote or other acknowledgement of the unresolved navigability status of many of the waterbodies in the NPPr.

Page 47, Table 2 - A footnote should be included that acknowledges the unresolved navigability status of many of the waterbodies in the NPPr.

Pages 47-50 - A section should be included in this portion of the plan titled Navigable Waters to address submerged lands beneath navigable waters. The discussion should state that the acreage involved is unknown and that NPS will formally request BLM to make navigability determinations for waterbodies within the NPPr.

Page 73 - The acreage shown for item 3 under State Lands should be qualified to note that the final acreage involved with these lands is unknown.

MANAGEMENT OF THE WATERCOLUMN

We request that the GMP discuss the management of the watercolumn of waterbodies in the NPPr. These watercolumns remain subject to management authority by the State, although the State may choose to cooperatively manage such areas with NPS on a case-by-case basis.

Page 172, Motorboats - The wording should be revised to acknowledge the State's management authority over the watercolumns in the NPPr.

WATER RIGHTS

Federal reserved water rights are created either expressly or by implication when federal lands are withdrawn from entry (by Congress or other lawful means) for federal use. It is the State's position that federal water rights, both instream and out-of-stream, are either generally or specifically reserved for the primary purposes of the reservation. Characteristics of a federal reserved water right include:

- 1) it may be created without actual diversion or beneficial use,
- 2) it is not lost by non-use,
- 3) its priority date is from the date the land is withdrawn for the primary purpose(s) involved,
- 4) it is the right to the minimum amount of water reasonably necessary to satisfy both existing and reasonable foreseeable future uses of water for the primary purpose(s) for which the land is withdrawn. Water for secondary purposes must be obtained under State law, AS 46.15.

Discussion at the March, 1985 meeting of the Alaska Water Resources Board emphasized the importance of two aspects of federal reserved water rights. First, they are recognized only for the primary purposes for which the land was withdrawn, and second, they apply only to the minimum amount of water reasonably necessary to satisfy the primary purposes of the withdrawal. Legislation establishing the withdrawal of land is critical, because it establishes the priority date for the federal reserved water right, and often expressly states the primary purposes of the withdrawal. All of these aspects of federal reserved water rights - the priority date, the primary purposes, and the minimum amount of water reasonably necessary to maintain the primary purposes - are important concepts that should be reflected in the plan. To reflect these concerns, we recommend that the following language be included in the GMP under a subheading titled Water Rights, and referenced or reflected in the Land Protection Plan.

"The water resources of the Wrangell-St. Elias National Park and Preserve will be managed to maintain the primary purposes for which the unit was established. The primary purposes of this NPPr are _____, as cited in the following legislation establishing this national park and preserve (reference to legislation). Water for secondary purposes and all other uses within the NPPr will be applied for under AS.46.15. Specific water resource requirements for the primary purposes of the NPPr will be identified and the minimum amount of water reasonably necessary to maintain these purposes will be

quantified in cooperation with the State of Alaska. Once federal reserved water rights have been quantified, the National Park Service will file this information with the State in accordance with State laws."

Pages 73-74 - Although addressing the water appropriation issue is different from addressing inholdings within the NPPr, some mention of these "non-federal interests" within the unit boundary should be made in the Land Protection Plan. Portions of the language suggested above could be used. NPS water needs above and beyond the minimum amount reasonably necessary to maintain the primary purposes of the unit should accordingly not be considered a federal reserve right or interest.

RIVER MANAGEMENT

This section on page 27 does not adequately reflect river management authorities, nor address the need for cooperative management. Therefore, the following language should be added as an addendum to the last paragraph on this page.

NPS will work with appropriate State and federal resource managers to insure that State water quality standards and other management initiatives, eg. appropriation, are applied through cooperative efforts with the affected administrative agencies.

The Department of Environmental Conservation indicates a continuing interest in working with the NPS concerning water quality issues relative to visitor facilities, as plans become known for such improvements and to address impacts and wastes associated with current or prior mining activities.

The GMP should also indicate how NPS intends to address the impacts of various activities within the NPPr on water quality. Pages 59-60 currently contain a good summary of existing water quality requirements. However, portions of the plan regarding mining (page 26) and facility development (30-34), for example, do not address water quality considerations.

FORESTRY

Page 27 - Firewood gathering is recognized as an important subsistence activity on page 123, but little recognition is given to firewood gathering in the General Management Plan chapter. A section should be added under the heading Vegetation that explains how the NPS intends to manage the forest resources in the NPPr for local use.

Page 67, paragraph continued from 66 and last paragraph - The NPS indicates concern for potential "illegal cutting of timber." However, the GMP does not address restrictions on timber or firewood. We agree that any large-scale cutting would be inappropriate, but liberal allowance may be appropriate for traditional rural use of timber for cabin repairs, trapping, and firewood unless formally determined to be potentially damaging to the environment.

BOUNDARY CHANGES

Page 20 - Nothing in section 103(b) of ANILCA (or anywhere else) allows NPS to "acquire" 3,200 acres of State land at Guyot Glacier as a "minor boundary change". If NPS wants to acquire these lands, it may propose an exchange with the State under their authority in section 1302(h) and under the State's authority contained in AS 38.50. Any application will be properly considered; however, the State currently has no interest in pursuing this exchange. The proposed boundary change should be otherwise abandoned. The section that discusses this issue should be rewritten to reflect this concern.

Page 21, paragraph 3 and 4 - The proposed additions to Wrangell-St. Elias NPPr presently net 21,800 acres. The GMP indicates that it will pursue legislation to automatically add Native corporation lands to the Park if those lands are made available to the federal government through any means. If a substantial amount of land becomes available, this might add sufficient acreage to exceed the 23,000 acre limit set by Congress. To stay within that limit we request that a priority listing of additions be included in the plan.

Pages 139, 140, and 145, Impacts on User Experience, paragraph 2 - Section 103(b) of ANILCA requires the "boundaries shall follow hydrographic divides or embrace other topographic or natural features". Regardless of alternative chosen, needed boundary adjustments should be pursued and impacts of various adjustments described without dependency on selection of any particular alternative.

WILDERNESS SUITABILITY

NPS has determined that in Gates of the Arctic, areas with ATV use easements are unsuitable for wilderness. In Wrangell-St. Elias, this is not one of the criteria. The State requests clarification or justification for this difference.

The Wrangell-St. Elias GMP has identified roads and ATV trails that are improved and regularly used as being unsuitable for wilderness (p. 23). However, the map in the plan that shows areas suitable for wilderness includes corridors that are

regularly used for public access. The State recommends that NPS reevaluate their wilderness suitability map by overlaying this map with a map showing the possible RS 2477 rights-of-way and 17(b) easements that have been provided by the State. Areas that overlap with these easements or trails should not be considered suitable for wilderness.

COOPERATION

Page 30 - The list of cooperative agreements should list the agreement between NPS, DNR, ADF&G, DOT/PF, FHA (Federal Highway Administration), and Ahtna, Inc. to coordinate land management along the Chitina-McCarthy Road to recognize the road's scenic, historic, and recreational values.

Page 31, paragraph 4 - We request the end of this paragraph include examples of interagency cooperative efforts that have either been conducted, are presently underway, or are planned. As an example, NPS has worked cooperatively with ADF&G in collection of data concerning harvests and use of resources in Wrangell-St. Elias NPPr by local residents.

Page 31, paragraph 5 - We suggest that the sentence be restructured more positively as follows: "The 'Consultation and Coordination' section of this plan details the steps taken by the Park Service to develop and maintain ..." .

Page 152 - Under the section on consultation and coordination with the State of Alaska, the Alaska Congressional Delegation should be listed under U.S. Government. There is also no Director of Natural Resources and Subsistence as listed here. Also, the Division of Parks, State Forester's Office and State Historic Preservation Officer should all be listed under DNR.

ANILCA PURPOSES

Page 3, Overall Management - The ANILCA modified traditional NPS management for Alaska and, correspondingly, we suggest the first sentence be revised as follows: "National park system management in Alaska strives to provide resource protection and maintain visitor uses." We note that Title II of ANILCA consistently directs NPS to protect the resources rather than preserve them.

Page 5, Purpose of the Park/Preserve - The location of the ANILCA quote should be referenced. We also request clarification that ANILCA Section 201(9) states that the "park and preserve shall be managed for the following purposes, among others" (emphasis added).

In quoting the purposes of ANILCA, we request insertion of the following phrase regarding maintenance of wildlife species: "of inestimable value to the citizens of Alaska and the Nation,". In the first sentence of the last paragraph describing administration pursuant to the Act of August 25, 1916, we request insertion of "Subject to valid existing rights" and "as amended and supplemented (16 U.S.C. 1 et seq.), and, as appropriate, under Section 1313 and the other applicable provisions of this Act [ANILCA]."

Page 42, paragraph 1 - Insertion of the reference "Section 201(9)" in the first sentence would assist the reader. We request this sentence clarify the ANILCA provisions "The park and preserve shall be managed for the following purposes, among others:" (emphasis added).

Page 52, paragraph 2 - Replace "preservation" with "protection" in order to be consistent with ANILCA purposes.

Page 61, Application, paragraph 2 - Replace "preservation" with "maintenance." The ANILCA emphasizes protection and maintenance of the resources and provisions of their uses.

Page 157, Appendix A: Management Objectives - As described in our reviews of recent GMP's for other NPS units, we are concerned about the location of objectives in the appendix rather than in the beginning of the plan. The location will inadvertently reduce public review of a very key portion which serves as a reference base for management decisions.

Page 168, Habitats - We request "preserve" be replaced with "protect", consistent with the provisions of ANILCA.

LAND PROTECTION PLAN

The Land Protection Plan is not very realistic for two reasons. First, with over one million acres of inholdings, it is not realistic to propose to eliminate or gain some interest (less than fee-simple) in all inholdings. We question whether it is in the national interest that public money be spent to acquire an interest in all inholdings, as some of these inholdings do not have values of national significance worthy of acquisition while other inholdings are likely to remain in the natural and/or historical condition whether or not NPS acquires interest in them. Second, the preferred means to acquire a great majority of these inholdings (primarily the Native corporation lands) is through exchange. An exchange, however, requires that NPS or other federal agencies give up other land of equal appraised value. An exchange could more realistically be used to consolidate inholdings in certain areas of the NPPr, rather than remove them. Exchanges with other federal agencies to remove over 800,000 acres of inholdings from Wrangell-St. Elias NPPr are also not realistic as the FWS or USFS aren't likely to have such vast acreages to exchange and BLM lands often lack values of interest to the Native corporations.

Although the Alaska Statehood Act and ANILCA provided for conveyances or selections (which largely pre-dated the NPPr, the GMP indicates a high level of concern with the future management of those conveyed or selected lands (pages 63-75). Certainly ANILCA provides for the protection of local residents and landowners and ANCSA anticipated that Native landowners are to derive a livelihood from their land selections. Similarly, University lands are expected to provide an income to the University of Alaska. While NPS indicates that use of cooperative agreements is the preferred method of achieving some management control of these inholdings, it is also stated that if they can't agree, NPS will propose fee acquisition or land exchange even though such a position does not seem to reflect Congressional intent. Considering that the proposed GMP adopts, in part, a "wait and see" attitude for the development of the Wrangell - St. Elias NPPr, the attention given to large tract State and Native lands seems misplaced.

The Land Protection Plan should include a rough estimate of the cost of implementation. These figures should then be compiled for all nine GMP's and Statewide recommendations for acquisition reconsidered based on this information. Until this is done, it will be unclear how realistic the acquisition recommendations are for the various NPS units.

In light of budget constraints, we question the viability of the emphasis on acquisition as a preferred method of protection. Greater emphasis on other methods such as cooperative agreements and easements would be more cost effective, increase NPS flexibility, and likely improve working relationships with local landowners.

In discussions of future land acquisitions or boundary changes, the GMP defines areas and presents justification for inclusion of candidate lands into the Preserve. However, nowhere do they stipulate whether those lands are candidate areas for park, preserve or wilderness designation, even near boundaries. This intent may have major ramifications because of potential access, resource use, and other management consequences. We suggest that each of the tracts that are being considered have an accompanying sentence stipulating what status and management intent will be applied to that particular parcel if acquired. We request further opportunities to review this intent prior to adoption of the final GMP.

Pages 44 and 45, - We request that the excerpts of legislative history be quoted completely to more fully clarify legislative intent. For example, the omission at the bottom of Page 44 "as McCarthy," should be reinserted. Also, omitted language on the third line on the top of Page 45 (shown below) should also be reinserted to further clarify a significant portion of congressional intent reflected in the final compromise bill:

"The dissenting views presented in our Interior Committee report, reflecting a version of the bill subsequently passed by a large majority of the House, constitute a significant part of the legislative history of the Alaska National Interest Lands Conservation Act. In discussing the Wrangell Mountains area, these views point out that the existing rustic rural settlements harmonize with and in fact complement the park scene, but they also emphasize that the Secretary shall assure that development of and access to private lands are compatible with the larger national purposes of the park and preserve. The Congress intends that the Secretary take this mandate very seriously.

"Changes made by the Senate regarding land acquisition authority do not affect the intent of this section."

- Page 45, Resource Management and Visitor Use - The Management Objectives are the basis upon which the GMP has been developed. Locating them in the Appendix rather than the beginning of the plan inadvertently reduces adequate public review on a key aspect of the GMP.
- Page 49, Chitina Village, Inc. - Chitina Village, Inc. has recently adopted a program of prohibiting public access across their lands unless a trespass fee is paid. This had led to some reported conflicts between landowners and other local subsistence users. Other regional corporations may also begin requiring trespass fees. This updated information should be noted in the text.
- Page 49, Chitina Valley Corridor - The document states that subdivisions have "led to conflict with those engaged in the rural Alaska lifestyle and subsistence." No evidence exists that such conflicts have occurred as a result of past State land sales in the area (although the potential may be there). Anyone who tries to live on land sold by the State will also be likely to pursue a rural Alaska lifestyle, not conflicting with these lifestyles. The section should be rewritten to acknowledge this.
- Page 51, paragraph 5 - After "character or" insert "impair." We also request a clarification through criteria or defined parameters.
- Page 52, last paragraph - This states that any development adjacent to the NPPr will cause "undesirable development". The GMP should clarify what is meant by this statement.

Page 55, Cooperative Agreements and Alaska Land Bank - When entering into cooperative agreements, we request that NPS notify and coordinate with the State to assure continued public and agency success and consistency in planning and resource management whenever possible. We are also interested in protecting key consumptive and nonconsumptive user access points. We therefore suggest that an additional statement be made specifically assuring continued cooperation between NPS and ADF&G when entering into cooperative agreements because of our interrelated resource management responsibilities. This is consistent with the MOU in Appendix J which discusses the increasing need to coordinate resource planning and policy development.

Page 60, paragraph 2 - We request the following be added:

The ADF&G requires application of permits for activities in specified anadromous fish streams pursuant to Alaska Statutes (AS) 16.05.870. We request this be acknowledged through insertion of the following: "The Act requires any person or governmental agency that desires to construct a hydraulic project, or to use, divert, obstruct, pollute, or change the natural flow or bed of a specified river, lake, or stream, or to use wheeled, tracked, or excavating equipment or log dragging equipment in the bed of a specified river, lake, or stream to notify the Commissioner of ADF&G of this intention and to receive approval from ADF&G before beginning the construction or use. This approval is subject to conditions and stipulations to protect anadromous fish and their habitat."

Concerning mining activities, NPS should reference the current work of the "Placer Mining Task Force", which represents an interagency, industry, public cooperative effort. The following language is suggested.

Current efforts are underway via a "Placer Mining Task Force" which includes federal and State resource managers, and both industry and public interest representatives to develop appropriate field management guidelines applicable to the mining industry. Such guidelines would likely apply to all NPPr units, as well as other CSUs.

Page 61, Methods of Acquisition - Boundary adjustments should also be recognized as a viable method of land acquisition for the protection of resources. We request they also be addressed in this section.

Page 62, Relinquishment - This paragraph indicates relinquished lands allow the relinquishing entity to qualify for other lands outside Wrangell-St. Elias NPPr. The discussion needs clarification to distinguish these actions from exchanges discussed above and should note that most State land in the NPPr is tentatively approved or patented and cannot be relinquished.

Page 63, paragraph 2 - "Eminent domain" had not been discussed as an acquisition alternative. We understood the exercise of "eminent domain" was prohibited by ANILCA in Alaska. We request this be clarified and clear criteria for its application be included.

Page 64 - NPS should include a fourth priority category called "Lands in which NPS does not propose to acquire an interest."

Page 67, State Land in the Chitina Valley - This discussion indicates that NPS desires a cooperative agreement with the State to preclude further subdivision of State lands. The State cannot agree at this time to such an agreement. The CRBAP will be used by the State to determine what the most appropriate uses are for State land in this area.

We also note that "university lands" are owned and managed by the University of Alaska, not the Alaska Department of Natural Resources. These lands are not included in the CRBAP.

This section also states that NPS may try to acquire fee title to the land through donation. The State has no plans to donate land to NPS. This option is therefore not feasible in the foreseeable future. If NPS land can be identified that the State wishes to acquire by exchange (and it is determined to be in the State's interest to proceed) an exchange for the Chitina Valley land may be considered. It is desirable that NPS land needed to equalize the value of this State land in Chitina Valley come from within Wrangell-St. Elias NPPr.

The land protection priorities map includes the McCarthy and Kennicott townsites and other private lands in McCarthy in Priority Group 1. Yet, the description of these lands on page 67 identifies only 28 tracts. Many more than 28 tracts exist between the Lakina River and the Nizina River if McCarthy is included. Are McCarthy and Kennicott included in this category, or does NPS have a different strategy for lands within the community itself? We also question NPS's intent for the area along the Kennicott River, where a considerable amount of private land exists between two large blocks of State land. These private lands are not shown on the map. We request that the land protection plan specifically address these tracts.

ENVIRONMENTAL ASSESSMENTALTERNATIVES

Page 80, ALTERNATIVE A - NO-ACTION ALTERNATIVE - The NPS opposition to this alternative is clearly represented by the tone in the first paragraph. This negative approach seems inappropriate. The intent of ANILCA Section 201(9) is to "maintain unimpaired the scenic beauty and quality" of the area; NPS would obviously not entertain an alternative contrary to that intent. The discussion in Alternative A implies that little has or will be done to change the area from conditions prior to 1980. However, a baseline network of NPS facilities is already in place, and except for those facilities, the Wrangells area is basically wild. For the life of this plan (5-10 years), we also prefer selection of Alternative A; most visitor use will probably remain "self-initiated" for wilderness activities, consistent with the primary purposes for designation of the area. Current uses and activities are generally meeting visitor needs and the GMP does not provide data to support the additional developments nor restrictions proposed in the preferred alternative.

Page 80, Alternative - Narratives for alternatives B through D present a different tone than the negative implications presented in Alternative A. However, Alternatives B through D respond to visitors seeking varying degrees of a controlled (non-natural) environment and a structured visit. Access upgrading and improved visitor facilities could encourage wilderness outings in groups of 100 or more. Alternative B will certainly tend to concentrate visitors and control their activities leading to increased user conflicts, particularly between consumptive and nonconsumptive users.

Page 87, General Development and Access - The second sentence "Ranger stations would be primarily ... outside the park/preserve" contradicts Page 84, where this alternative calls for "... ranger stations within the park/preserve (rather than outside the area" Intent for general development states "Roads would remain essentially in their present condition" but a subsequent paragraph states that the GMP is advocating "minor improvements." We request clarifications.

Page 88, ALTERNATIVE C - This alternative provides significant development and encroachment into the park/ preserve through increased services and facilities to create demand by a group of people not currently utilizing the area. This alternative will undoubtedly increase user-group conflicts if the numbers of users do increase, resulting in increased

wildlife-human interaction problems. However, the only significant difference between this and other alternatives is the degree of facilities provided for users. No management intent for the unit appears different from other alternatives.

Page 94, ALTERNATIVE D - At first glance, this alternative appears potentially disastrous for both current users and certain wildlife subpopulations. Both the proposed road additions and associated facilities (Orange Hill area and Kuskulana-Iron Mountain area) are unacceptably located in close proximity to high sheep concentration areas where hunting activity is intense. Substantial user conflict and sheep displacement would undoubtedly result. Further analysis of the majority of developments, however, indicates little substantive change -- such as minor improvements on stream crossings of existing access roads and existing cabins or shelters. The alternative mentions boundary changes but fails to discuss them.

Paragraph 2 - Tebay River may be clear part of the year; however it is clouded with glacial silt during most of the summer. Tanada Creek qualifies as a major clear water stream that should be included in the last sentence.

ENVIRONMENTAL CONSEQUENCES

Page 139, Impacts of Alternative A - The presentation of Alternative A consists of vague reasons for not selecting it. For example, the first paragraph implies selecting Alternative A will result in such poor management that poaching will run rampant in the park/preserve, yet poaching is not identified as a problem in the plan. The first paragraph also implies that significant impacts on resources will be undetected due to lack of monitoring. We request this be clarified as ADF&G monitors the fisheries and wildlife resources, regardless of political boundary, and desires cooperative efforts with NPS to preclude significant impacts on the resources regardless of alternative selected.

Pages 140, 142, and 144, Impacts on Natural Resources - Improved administrative facilities do not necessarily improve protection and management of natural resources.

Page 144, Alternative D - The impacts describe 20 percent of high density sheep habitat will be disrupted. This is significant and directly contrary to the purposes of the unit, therefore, this alternative is artificial and unnecessary. The NPS states that mitigation for the visitor center and loss of habitat would occur but fails to include

a mitigation plan, such as creation of new habitat or improvements to poor habitat. The latter are active wildlife management tools inconsistent with their previous prohibiting statements in this plan. We are concerned about maintaining the sheep densities on existing habitats regardless of which alternative is selected and oppose any major loss of habitat as proposed in this alternative.

Page 145, Impacts on User Experience, paragraph 6 - The comments regarding minimum conflicts between user groups are not accurate. The proposed developments are in areas of current heavy use already, but for a different purpose than visiting a NPS visitor center. The .002 percent of the park area affected is significant; less than 50 percent of the park area may actually serve as wildlife habitat because the remainder is rock, ice, and snow. If the winter range (often considered a significant limiting factor) is affected, the reduction in carrying capacity could be very significant.

Page 146, paragraph 4 - According to the draft plan's map of permanent residences there are no residents along the route of the proposed Kuskulana Road. Residents on the existing road to Strelna may be affected, but we request clarification of anticipated impacts on lifestyles of nonexistent residents.

Page 146, paragraph 8 - The NPS again proposes habitat and population mitigation options, contrary to previously described management decisions. We request clarification.

Page 147, Table 3: Summary of Impacts - The summary for Natural Resources under Alternative A is incorrect. "Limited management capability would produce an inability to effectively protect or manage natural resources." For example, ADF&G protects fisheries and wildlife resources by numerous measures regardless of money and facility limitations. We request the impacts on Natural Resources be reassessed for all alternatives consistent with existing management capabilities and cooperative agreements.

The status quo alternative may propose no new capital improvements but it certainly costs more than the "\$0" indicated under column "Alternative A." We request operating and capital costs be included for comparison of all alternatives. It would assist reviewers to reference Appendix D and/or merge the tables.

THE ALASKA COASTAL MANAGEMENT PROGRAM


The Division of Governmental Coordination has also completed the coastal consistency review of this draft plan. Based on our review, the Division agrees with the NPS determination that the plan is consistent with the Alaska Coastal Management Program (ACMP). However, we wish to note that the more detailed Resource Management Plan as well as permitted activities and NPS actions on federal lands that "directly affect" coastal resources are also subject to the requirements of the ACMP. In other words, State agreement with the federal consistency determination of the GMP at this time does not automatically guarantee that the recommended activities will be consistent with the ACMP when detailed later in specific management proposals. We therefore recommend that NPS involve the local Coastal Resource Service Area Boards and State agencies in the development of the more detailed action plans.

We request that the final GMP acknowledge the ACMP and outline the process under which NPS will ensure that more detailed management plans, NPS actions, and permitted activities will be consistent with the ACMP. Reference should be made to the MOU between NPS and DGC (currently in draft) which addresses this process.

We have commented only on parts of the plan to which we have concerns. However, State agency reviewers wish to be advised of any changes to other parts of the plan that may result from comments of other agencies or individuals. Many of the comments included here will reappear in our comments on the remaining National Park Service GMPs. Unless there is a reason why the response to these comments should be different, they deserve a consistent response on a statewide basis.

Thank you for the opportunity to review this draft General Management Plan for Wrangell - St. Elias NPPr. As noted at the beginning of this letter, we request that our concerns be addressed as consistently as possible in this and all remaining GMPs. If we can be of any assistance in clarifying these comments, please contact this office. The State looks forward to resolution of our concerns prior to adoption of the final plan.

Sincerely,



Sally Gibert
State CSU Coordinator

ATTACHMENT

cc: R. Davidge, DOI
J. Katz, Governor's Office, D.C.
S. Leaphart, CACFA
J. Leask, AFN
R. McCoy, ALUC
State CSU Contacts

TABLE OF CONTENTS

State Comments, WRANGELL ST. ELIAS

ACCESS AND TRANSPORTATION	2
General Organization of Access Issues	2
Page-Specific Comments	4
VISITOR USE AND FACILITIES	10
Cabins and Shelters	14
NATURAL RESOURCE MANAGEMENT	14
Fish and Wildlife	15
Subsistence	24
In Summary	26
Tide and Submerged Lands	29
Navigability	30
Management of the Watercolumn	30
Water Rights	31
River Management	32
Forestry	32
Boundary Changes	33
Wilderness Suitability	33
Cooperation	34
ANILCA Purposes	34
LAND PROTECTION PLAN	35
ENVIRONMENTAL ASSESSMENT	40
Alternatives	40
Environmental Consequences	41
THE ALASKA COASTAL MANAGEMENT PROGRAM	43