

Sally  
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STEVE COWPER, GOVERNOR

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December 5, 1986

Mr. Boyd Evison  
Regional Director  
National Park Service  
2525 Gambell Street  
Anchorage, AK 99503

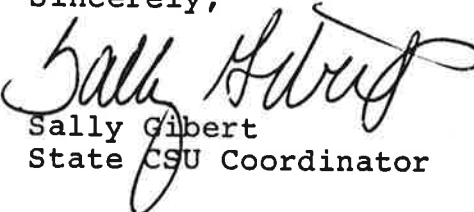
Dear Mr. <sup>Boyd</sup> Evison:

As noted in our letter of November 24, the state is submitting the attached supplemental comments and maps which we hope will be useful to you and your staff during preparation of the range of alternatives for National Park Service (NPS) wilderness recommendations. Most of these comments and observations were generated at the field level by various local Alaska Department of Fish and Game staff. If you or your staff have any questions regarding the attached information, please feel free to contact this office so that we can put you in touch with the appropriate knowledgeable staff. Please be aware that the comments attached are not intended to be comprehensive. State agencies will conduct a more thorough analysis of the alternatives when the draft environmental impact statements are released for review.

The state also wishes to add an additional general comment which would be applicable to all units. Upon reviewing the summary of changes made in the nine General Management Plans (received on December 2) it appears that the final GMPs have not significantly increased the NPS commitment to subsequent planning for access. The state reiterates its long-standing concern that access planning is critical to protecting the long-term access and transportation needs of Alaskans. We thus suggest that the NPS increase its efforts to initiate access plans for all units, with an emphasis on areas where wilderness recommendations are under consideration. At a minimum, the NPS should thoroughly analyze the impacts of any future wilderness designations on the state's access and transportation needs to avoid precluding or unnecessarily restricting important transportation options.

Thank you for the opportunity to provide these supplemental comments. If we may be of assistance in clarifying our comments, please feel free to contact this office.

Sincerely,



Sally Gilbert  
State CSU Coordinator

Attachments:

- Narrative information by NPS unit
- One set hand-colored maps

cc: Robert L. Grogan

# Attachment to state comments of 12-5-86

## Yukon Charley Rivers National Preserve

Please see the state's previous comments regarding the classification or designation of this unit for wilderness management. The importance of the Yukon River as a major transportation corridor needs to be discussed. The distribution of cabins and their uses also need to be portrayed.

## Lake Clark National Park & Preserve

The western side of the unit is extensively used by aircraft, boats, and snow machines for hunting, trapping, and fish and wildlife related recreation. The existing wilderness boundary, which has been interpreted to limit such access as well as cabins and other visitor uses, is very difficult to find in the field. The boundary needs to be readily identifiable in the field so that it can be determined which existing uses of the preserve would remain under wilderness designation.

## Kobuk Valley National Park

The existing wilderness boundary was directed by Congress to lend maximum protection to the Waring Mountains and the Sand Dunes. Unfortunately, the northern boundary follows township lines rather than natural landmarks. We suggest the boundary line follow elevation contours and drainages. The Kobuk sand dunes area has significant potential for caribou and bear hunting and for berry picking. Opportunities for these uses should be clearly identified in the alternative. As for timber harvest in the rest of the unit, this does not presently constitute a problem for wildlife.

## Cape Krusenstern National Monument

Although we cannot attest to the accuracy, we have identified, on the attached map, the approximate location of traditional, mechanized access trails. The identification and location of these trails is based on old maps of trails, journals, an RS2477 trail map, and hearsay from staff who have been in the area. The area game biologist also claims the area is "criss-crossed all over" by trails and various access routes. He could give more accurate trail locations with more time.

## Noatak National Preserve

The wilderness boundary on the T27/28N township line is not locatable in the field. Locatability could be improved by angling to meet the north bank of the Eli River. Doing so would put additional land in wilderness.

The area is relatively well used by aircraft and mechanized vehicles for hunting, fishing, and trapping, and this needs to be reflected in describing the options and other use areas.

#### Katmai National Park & Preserve

Alaska Boundary Series Sheet #2; USGS Iliamna  
Alaska Boundary Series Sheet #4; Mt. Katmai

There should be a decision alternative that does not portray the wilderness extending further into the preserve portion (northwest edge of park). This could be achieved by moving the wilderness boundary to the park boundary line following elevational contours from Sugarloaf Mountain to Nonvianuk Lake. The park boundary can also be moved to the mountain peaks to the south of Nonvianuk Lake to Oakley Peak, along with the wilderness boundary. (Attached maps show existing status.)

The fact that there are some key access lakes within the wilderness and non-wilderness portions of the preserve needs to be explained to readers.

#### Aniakchak National Monument

Wilderness proposals should be consistent with adjacent refuge proposals.

Natural features, rather than section lines, should be used to identify interior wilderness boundaries even where inholdings occur. This is particularly important where existing uses may be affected, so that the public has a complete understanding as to which uses would continue.

#### Bering Land Bridge National Preserve

Most of Bering Land Bridge is criss-crossed with cat trails, ORV and ATV access routes and trails, numerous landing areas, old mining roads, aquaducts, and winter dog sled and village trails. The northern wetlands portions also support some reindeer grazing.

The neck of one township, that extends west and south around two lagoons, may be impractical to manage. There are also

trails in the area and other uses such as the Serpentine Hot Springs Area.

Also, the only access between communities, mining claims or other inholdings is via winter or summer ORV access, dogs, or aircraft. Most of the entire preserve is an "access area" except for the northern wetlands area and some of the lava fields.

#### Kenai Fjords National Park

The enabling legislation for the Kenai Fjords identified recreational uses, including mechanized equipment, as one of the main uses of the area. It is suggested that a decision alternative be included which excludes coastal areas, inholdings, and access sites from proposed wilderness designation.

#### Gates of the Arctic National Park & Preserve

The preserves were not designated by Congress as wilderness, apparently due to existing uses and the intent that those uses continue. The area is accessed by aircraft and other methods.\* The lower left portion of area is only three townships wide, which could render management as wilderness more difficult. Also the upper right corner of the designated preserve has many uses and trails.

Due to the uses and activities occurring along the highway corridor, including extensive aircraft overflights, we suggest a decision alternative be included which moves the wilderness boundary to the ridge top following the eastern boundary and inland, exclude the relatively high use corridor and inholdings.

- \* Aircraft access in the upper Kobuk Valley (southwest preserve of GAAR) is the most practical form of access, although other forms of access have traditionally occurred.

#### Denali National Park & Preserve

Originally, Congress did not place the park additions in wilderness status, most likely to allow for facilities, as well as visitor use, which Congress recognized as needing expansion. We suggest a decision alternative be included where the preserve additions would not be designated as wilderness. We suggest this alternative be included due to the potential impacts of such a designation on existing uses (e.g. aircraft, chainsaws, motorboats, camping, hunting, and trapping).

Also, none of the boundaries for the Denali wilderness follow natural features.

#### Katmai National Park & Preserve

Alaska Boundary Series Katmai No. 3; USGS Naknek

Congress kept much of the shoreline of Naknek Lake nearest King Salmon and the Naknek River in Park, but not wilderness status. One stretch of shoreline is a finger of wilderness surrounded by non-park land and a lake with difficult identifiable features. Because uses in the area including access and fish camps may be affected, it is suggested a decision alternative be included which moves the wilderness boundary to follow prominent inland features as is done on the facing shore. For example, the boundary's last prominent feature is the highest point on a peak in R42W T19S at approximately 30'. The boundary could go from there to the northeast to a lake whose drainage goes to Lake Brooks. Following that stream and the south shore of Lake Brooks, the boundary could then follow a creek from the lake to the existing wilderness boundary along the road corridor. In such an alternative, most pre-wilderness activities could continue in the park, consistent with areas on either side, thereby reducing conflicts and management problems, which increasingly affect visitors and local residents. This change could improve management of the area.

It is also suggested that a decision alternative be included which deletes Naknek Lake, and other key/or navigable access lakes in the unit, and Valley Road from wilderness designation. Congress intended the latter be available for commercial facilities.

#### Katmai National Park & Preserve

There are five locations along the Pacific shore which are presently not designated wilderness to accommodate cabins, fishing camps, inholdings and various uses of the areas. The NPS maps, currently in preparation need to show how these areas are to be designated. It is suggested that a decision alternative be included which specifically deletes these five locations from wilderness designation.

#### Glacier Bay National Park & Preserve

The boundary in the Deception Hills northward to the outlet of Alsek Lake is nearly impossible to locate in the field. Per previous recommendations to NPS, it is recommended that a decision alternative be included that moves the wilderness boundary (and eventually the Park boundary) to the western

edge of the Grand Plateau Glacier. It is our understanding that with such an alternative, the NPS management (enforcement) in the area would be immensely simplified. We are also aware that the owner of a cabin in this area has been severely curtailed in his private and commercial activities because the boundary narrowly includes him.

A lot of boating and aircraft activity is conducted on the Alsek River and Lake. The river and lake are navigable, hence state-owned, a long distance into the park. It would be beneficial to the public in reviewing wilderness alternatives to have the boundaries accurately drawn to exclude these state waters.

Three maps are depicted:

- 1) status quo;
- 2) suggested wilderness boundary changes;\*
- 3) suggested park and wilderness changes.\*

\* with corrected boundaries.

#### Wrangell - St. Elias National Park & Preserve

It is suggested that a decision alternative be included which incorporates the following suggestions:

The wilderness boundary at Disenchantment Bay and Russell Fjord is creating some problems (Hubbard Glacier area). People need to be able to access the area to study the glacier and associated environmental phenomena associated with the glacier's activities. Because of the dynamic nature of the glacier, we suggest that a liberalized policy may be needed by both the NPS and the Forest Service to allow such studies and needed access or that the wilderness boundary be moved away from the immediate area.

The narrow preserve area near the Malaspina Glacier (across Yakutat Bay from Yakutat) is bisected by wilderness. This wilderness boundary is mostly a stair step which is not field locatable. The boundary is also incorrectly drawn on USGS maps to include the inland water body to the southwest of Grand Wash at the face of the glacier. It is suggested that the wilderness boundary be slightly revised to follow natural features as depicted on the attached map. Because of the significant use of the area for mechanized equipment, air and boat traffic, and other activities, wilderness may not be suitable for this area.

The USGS map shows the park/wilderness boundary too far south on the west side of Icy Bay. It should be closer to Kichyett Point, running due west from there.

At the southern juncture of preserve and preserve/wilderness (R6E, 7E, 8E) are several key access sites (lakes, landing strips) which may not be appropriate for wilderness status. This is a heavily used area, criss-crossed with access trails, and contains numerous landing areas.

The park non-wilderness knob in R9E, 10E, 11E and 12E between T7-10N is almost the only subsistence area in the whole region which subsistence users can access from the road (ORV's are commonly used throughout this area). It is suggested that the status of this area be changed. <sup>not</sup>

Throughout this northwestern portion of the unit we suggest the wilderness boundary be moved from township lines to the 4000' elevation line. A small total amount of area would be lost to wilderness total acreage, but all key access areas and sites, conflict areas, and difficult to locate boundaries would be significantly eliminated.

At the park boundary juncture with park/wilderness at Goat Creek (R11E, T6N) we find the boundary particularly difficult to locate. Hence, it is suggested the boundary be moved to follow Goat Creek and Wait Creek until again reaching the 4000' elevation line, then following that elevation line easterly around Gold Hill. Because of the steep terrain at that elevation, the boundary is fairly clear.

From Gold Hill south (going easterly), the present boundary (R13E, T6N through T4N) is a straight line configuration for 15 miles. Because steep terrain runs nearly parallel to the existing boundary at about 4000', we suggest the boundary be changed to follow that elevation, crossing the Nabesna Glacier at 4000' (or at its present location) then proceeding north at the 4000' elevation line. At this point it is suggested that five additional townships be placed in wilderness status. These townships have no major historical developments, access points, or user conflicts. It is suggested the 4000' elevation line follow the ridge northward and east until it reaches Cooper Creek. The boundary could then follow Cooper Creek and Notch Creek (excluding the historical trail alongside both) through Cooper Pass, then follow the 4000' contour crossing both forks of Cross Creek and proceeding along the front (eastern) 4000' contour of Euchre Mountain (R18E, T3N). At this point, the



boundary (opposite Colenda Creek juncture with Chisana River) is the existing boundary, following Bryan Creek to the 5000' elevation line to the peak west of Beaver Lake, dropping east-west to the lake where outlet feeds into Beaver Lake, etc., following the existing boundary.

A decision alternative should also be included which deletes portions of the northern part of the unit from wilderness designation. The uses of this area, both historical and present, may conflict with wilderness extensions.

WRST (Nabesna quads & Gulkana): Additional Comments.

Within T5N R11E there are two lakes near Jacksina Creek which may not be appropriate for wilderness designation unless all aircraft and ORV access, horses, on the lake and trails are allowed to continue per pre-ANILCA uses. Therefore, due to user conflicts, a preserve non-wilderness status may be more appropriate for this lake area. These areas could be excluded by:

1. moving the wilderness line from the park/wilderness and park/preserve junction in R10E T6N to follow the 4000' elevation contour on the west side of Goat Creek to Jacksina Creek and then returning to the existing wilderness boundary at Gold Hill; or
2. deleting the lakes, strips, and trail in the same fashion as is done at Tebay Lakes.

WRST (McCarthy quad)

It is suggested a decision alternative be included which deletes the upper Chitina River valley floor from wilderness designation. This area is heavily used for recreation, including access by aircraft, ORV's, boats, and other mechanized equipment. Two maps are attached. Map 1 is a suggested boundary change, where the boundary would be in contour the 4000' elevation line from Canyon Creek to Barnard Glacier. In this instance, the color yellow indicates preserve and the color blue indicates preserve/wilderness. Map 2 is a second alternative, where the boundary would contour the 2000' elevation line in the same area.

Other potential user conflicts in the area include horse grazing leases (e.g. at Bryson Bar). Horses are also used in the area without grazing leases. Under the proposed designation, use of horses may no longer be feasible even though they have been used throughout the Chitina River

valley for close to 100 years. A wilderness designation could also mean the end of grazing leases.

It is also noted that the USGS map shows the boundary to follow the ridge to the east of Canyon Creek. It is our understanding that this boundary actually follows Canyon Creek itself. Our suggested alternative would put the boundary in its present location at Canyon Creek.

#### WRST (Valdez quad)

In the upper left corner of this quad, the wilderness boundary has dissecting the preserve in straight line cuts that do not follow locatable features and that just barely encompass some traditional landing ships, cabins, and access trails. This may unnecessarily impact activities. A major access trail crosses from high up along the Nadina, Dadina, Chetashina and Cheshnina Rivers to the Kotsina River. The present wilderness boundary cuts back and forth across this trail. To ease management of the area, retain pre-ANILCA uses, and reduce user conflicts while maintaining wilderness boundaries for areas actually of wilderness quality, it is suggested a decision alternative be included where the boundary would continue to follow the 4000' elevation line until it reaches the existing wilderness boundary on the north face of Hubbard Peak (T2S, R7E and R6E). With this alternative, the trail described above, as well as access sites and/or cabins at the head of the Nadina, Chishekna, East Fork, Cheshnina, and Kluesna Rivers would be removed from wilderness status. Also, if NPS is unwilling to include this alternative, it is then requested a decision alternative be included that omits these specific areas from wilderness status in the same fashion as Tebay Lakes.

It is also noted that in this quad, the entire preserve boundary is shown on the wrong side of the Copper River on the USGS maps.

Title: Supplemental NPS Wilderness letter

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[1311] Mr. Bill Allen, Fairbanks  
[1312] Mr. James Barkeley, Esq., Anchorage  
[1037] Ms. Joyce Beelman, Department of Environmental Conservation, Fairbanks  
[1] Mr. Jay Bergstrand, Department of Transportation and Public Facilities, Anchorage  
[1388] Mr. Dave Cline, Anchorage  
[249] Mr. Norman A. Cohen, Department of Fish and Game, Juneau  
[1292] Mr. Frederick O. Eastaugh, Juneau  
[1293] Mr. Bart Englishoe, Anchorage  
[1294] Dr. Hugh B. Fate, Jr., Fairbanks  
[203] Mr. Peter Freer, Department of Community and Regional Affairs, Juneau  
[201] Mr. John Galea, Ketchikan  
[1263] Mr. Joseph W. Geldhof, Department of Law, Juneau  
[359] Ms. Lennie Gorsuch, Juneau Capitol Information Group  
[944] Mr. Clay Hardy, U.S. Department of Interior, Anchorage  
[1243] Mr. Robert D. Heath, Alaska Power Authority, Anchorage  
[1244] Mr. Robert Henderson, Department of Public Safety, Anchorage  
[1386] Ms. Kerry Howard, Department of Fish & Game Habitat Division, Juneau  
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[1298] Dr. John Choon Kim, School of Business & Pub. Affairs University of Alaska,  
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[1270] Mr. Larry Kimball, Alaska Federation of Natives, Anchorage  
[1275] Mr. Jim Kowalsky, Tanana Chiefs Conference, Fairbanks  
[1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks  
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