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June 9, 1986

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

Dear Mr. ^{BOYD} Evison:

The State of Alaska has completed its review of the April 1986 Review Copies of the National Park Service (NPS) General Management Plans (GMPs) for the following units:

Aniakchak National Monument and Preserve (ANIA)
Bering Land Bridge National Preserve (BELA)
Cape Krusenstern National Monument (CAKR)
Denali National Park and Preserve (DENA)
Gates of the Arctic National Park and Preserve (GAAR)
Katmai National Park and Preserve (KATM)
Kobuk Valley National Park (KOVA)
Noatak National Preserve (NOAT)
Wrangell-St. Elias National Park and Preserve (WRST)

We note that these documents are much improved from the previous Revised Drafts and have addressed a number of specific state concerns. It is clear that NPS has made a good faith effort to respond to state and public concerns. Below is a list of several ways that the GMPs have been improved which merit recognition.

- The GMPs, as a group, are far more consistent and better organized than earlier drafts. It is clear that NPS has made great strides in this direction.
- The GMPs recognize the value and necessity of future planning and the importance of involving the state and public in future decision-making at the local and regional level. Follow-through in this area is absolutely essential to the successful implementation of these plans.
- By and large, the GMPs do an excellent job of clarifying the regulatory process and accurately portray most of the

existing laws and regulations which govern management of NPS lands.

- The GMPs exhibit increased awareness of and sensitivity to Alaskan conditions and lifestyles.

However, the GMPs still do not (1) provide policy guidance on a wide range of important issues; (2) adequately protect existing and traditional uses consistent with ANILCA and Congressional intent; and (3) adequately address several other remaining issues of state concern. These broad concerns were addressed in detail in the state's February 9, 1986, letter regarding the previous Revised Drafts.

1. The GMPs do not provide policy guidance on a wide range of important issues. Resolution of many policy questions is deferred to future planning efforts (some of which may not occur due to severe limitations on NPS funding and staffing) and/or to the discretion of park superintendents. This deferral risks limiting state and public participation in the decision-making process. Too much discretion can also lead to arbitrary and capricious restriction of traditional uses.
 - a. For management decisions that rely on superintendent's discretion, policy guidance to establish the framework for case-by-case decisions is lacking (e.g., the issuance of permits for such uses as: business operations, helicopter landings, cabin use, subsistence use of aircraft, ORV use, and tree cutting.)
 - b. The GMPs do not provide sufficient assurances (e.g., targeted timeframes) that referenced future planning efforts for access and transportation, resource management, public use management, etc., will occur in a comprehensive and timely manner. Further, the GMPs do not clearly describe what proposed actions or decisions will be subject to public review.
 - c. Criteria are rarely provided regarding the type and degree of resource damage which may trigger restrictive rule-making (e.g., aircraft access).
 - d. The Land Protection Plans do not provide clear guidance on what uses of non-federal lands the NPS considers to be compatible or incompatible with park purposes. In addition, the land protection recommendations for acquisition and other protective measures are not sufficiently justified.

- e. The GMPs do not adequately describe overall management direction for lands identified as suitable for wilderness designation, as previously indicated in our January 14, 1986, statement to NPS. We are particularly concerned about the possible effect on the management of public uses.
2. The GMPs do not adequately protect traditional and existing uses.
 - a. Traditional uses are not adequately acknowledged or documented (e.g., subsistence use of ORVs). The GMP definition of "traditional", which affects what uses NPS will and will not allow, does not address basic questions such as who qualifies and what activities are traditional. The definition is so narrow as to exclude many pre-ANILCA uses and thus is not consistent with the intent of Congress. The NPS should seek resolution of this on-going concern in cooperation with other federal agencies which share ANILCA mandates as well as the state and public.
 - b. In certain cases, NPS appears to be short-cutting the regulatory process which must precede restriction of traditional uses (e.g., NPS is proposing restrictions on airstrip maintenance and the establishment of temporary facilities without going through formal rule-making).
 - c. Rationale for use restrictions is not adequately documented or substantiated and/or proposals appear unnecessarily restrictive (e.g., use of pack animals, cabins and temporary facilities.)
 - d. Alternatives to proposed restrictions on traditional uses have not been analyzed (e.g., proposed unit-wide visitor group size limits in Gates of the Arctic may be more appropriately applied to specific sites.)
 3. The GMPs do not adequately address several other remaining issues of state concern.
 - a. Several GMPs inappropriately state or imply that the development of roads under Title XI of ANILCA would be incompatible with the protection of park resources, thereby prejudging issues prior to submission of a Title XI application (e.g., development of a northern access route in Denali, and the development of roads and airstrips in Gates of the Arctic and on inholdings in Wrangell-St. Elias).

- b. The GMPs have not adequately addressed water rights. In connection with this concern, the primary purpose(s) of the units need to be cited.
- c. The GMPs have not adequately addressed remaining technical and biological concerns related to the management of fish and wildlife (e.g., the genetic consequences of bear removal in Denali).
- d. The GMPs do not acknowledge the state's willingness to consider possible cooperative agreements regarding management of rights-of-way.
- e. The GMPs identify as suitable for wilderness designation lands which are not suitable for wilderness according to GMP criteria (e.g., Serpentine Hot Springs in Bering Land Bridge and the Kakagrak airstrip in Cape Krusenstern).
- f. The GMPs do not provide for flexibility in deciding whether new additions to the units will be designated as park or preserve.
- g. NPS has not actively involved the state in the utilization of the Subsistence Resource Commissions (SRC) as is called for in Title XIII of ANILCA and has not facilitated SRC involvement in the development of subsistence management plans beyond the required hunting program.
- h. The GMPs do not indicate that any proposed changes to the negotiated agreements regarding the allowed uses of ANCSA Section 17(b) easements must be approved by the state and other participants.

Thank you for the opportunity to comment on these review documents. We urge that these issues be addressed as fully as possible prior to adoption of these GMPs.

Sincerely,



Robert L. Grogan
Director

cc: Senator Rick Halford, CACFA, Fairbanks
Alaska Land Use Council Members
Land Use Advisors Committee Members
John Katz, Office of the Governor, Washington, D.C.
Molly McCammon, Office of the Governor, Juneau