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December 6, 1988

Mr. Marvin Jensen
Superintendent
Glacier Bay National Park and Preserve
Bartlett Cove
Gustavus, AK 99826

Dear Mr. Jensen:

The State of Alaska appreciates the opportunity to review the draft Wilderness Management Plan for the Glacier Bay National Park and Preserve. The following page-specific comments are submitted on behalf of state agencies and represent a consolidation of state concerns and comments.

Page 2 - We request that the plan clarify whether the management provisions described in this document would apply to new Wilderness areas, if any are designated by Congress. As referenced in the plan, the National Park Service (NPS) is proposing 38,220 acres within the park and preserve for Wilderness designation. The state is particularly concerned about application of these provisions to the proposed Wilderness area in the preserve. This area is used by guides, sport hunters, trappers, and other local users. Several of the provisions outlined in the plan (e.g., the proposed camping stay limits) could adversely affect these users. We therefore recommend that the NPS explicitly exclude this area from the scope of this plan.

In addition, the state objects to the application of this plan to the marine waters within Glacier Bay National Park and Preserve. As indicated in previous state correspondence to the NPS, the state does not waive or concede its claims of ownership to the submerged lands and marine waters above them in Glacier Bay. (See letter from Sydeman to Evison, dated August 29, 1988.) We therefore request that the NPS also explicitly exclude marine waters from the scope of this plan.

Page 12, paragraph 1 - The first sentence is not entirely accurate. The park's outer coast and adjacent water were used by the Yakutat Tlingit, and continue to be used by residents

of Yakutat, Hoonah, Gustavus, Elfin Cove, and Pelican. We understand that the park boundaries from 1920 to 1939 did not include most areas used for subsistence purposes. However, some fishing by local residents in the area occurs today under state sport and commercial regulations. So, while the sentence in the text is not inaccurate, as far as it goes, it is incomplete and therefore misleading. We request that the plan not incorrectly convey the impression that subsistence uses of the park have not occurred in the recent past, and that such uses were solely restricted to the Hoonah Tlingit. Subsistence uses of the Glacier Bay area are well documented in recent studies by the Alaska Department of Fish and Game (DFG)/Subsistence Division, and in a cooperative research effort by the DFG/Subsistence Division, U.S. Forest Service, and University of Alaska.

Page 13 - We suggest that Item 3 be revised to recognize access by motorboats other than just tour boats.

Page 22 - We request clarification regarding which Wilderness visitor use zone would apply to the commonly used areas near the Alsek River and Alsek Lake. The state is concerned that some of the restrictions proposed in this plan (e.g., mandatory backcountry registration and camping stay limits) would unnecessarily restrict and/or encumber local use of these areas without demonstrated benefit to park resources.

Page 35 - The preferred alternative proposes to limit camping at any one site to three nights per person per visit. This seems unnecessary in Wilderness areas other than the frequently-used Glacier Bay inlets. We suggest that the NPS narrow the scope of this proposed restriction. One way to do this would be to develop criteria to identify areas where such a restriction is needed to protect specific resources.

Page 36 - The required backcountry permit "for all overnight stays on Wilderness areas" appears to be unwarranted, especially for local residents and long-time users of the Glacier Bay area. This could be particularly problematic if applied to local residents in the proposed additional Wilderness areas (e.g., the preserve). We suggest that voluntary registration may be a more appropriate management tool and that it may only be needed in heavily-used areas of the park.

Page 39 - This section, entitled "Resource Inventory," identifies studies such as monitoring of black bear habitat use and marine mammal, wildlife, and seabird populations. Given the DFG's responsibility and concern for the health and management of fisheries and wildlife populations, the state recommends that the NPS work cooperatively with the DFG to

identify and implement resource monitoring and research projects such as these.

Page 40 - The section on "Campsite Impact Monitoring" states that "certain areas of the bay receive an unusually high level of use because of their proximity to camper drop-off points, outstanding scenic areas, or major travel corridors." The paragraph goes on to say, "At this time, camper-related impacts within the park appear to be minimal except for the Riggs, Wolf Point, and Reid drop-off points." Since travel and drop-off points are limited within the park and impact monitoring is on-going, the limits proposed under the preferred alternative do not appear to be necessary at this time and serve as an additional level of regulation that is not needed in areas other than those described above. Therefore, we recommend that the NPS institute these limits only in high-impact areas as needed.

Page 46 - We request that the NPS clarify the statement that "NPS policy has traditionally been that Wilderness should be essentially motorless." The Alaska National Interest Lands Conservation Act (ANILCA) modifies implementation of the Wilderness Act in Alaska, as recognized at other points in the plan, and allows motorized access in Wilderness.

In addition, we question the appropriateness of including a summary of the draft closure regulations in this plan. The regulations were released in draft form in 1983, and were not adopted due to the substantial controversy surrounding them. We recommend that this summary be deleted.

Page 47 - The last paragraph describes aircraft overflights. We support the advisory minimum requested as appropriate in areas where wildlife could be adversely affected, such as harbor seal haulout areas on Muir and Johns Hopkins inlets.

Page 49 - We question the appropriateness of NPS' proposal to allow campfires only below mean high tide. Given the climatic and vegetative conditions of the park, as well as the extensive amount of backcountry included in the Wilderness area (and the difficulty of starting or using campfires under water) this restriction may not be desirable or appropriate.

Page 49 - We request that the NPS closely consult with the DFG in its preparation of the "Bear Management Plan" and other upcoming studies and management plans. We encourage the NPS to contact Dave Anderson, Regional Supervisor, DFG/Game Division, in Juneau at 465-4165 to initiate such consultation.

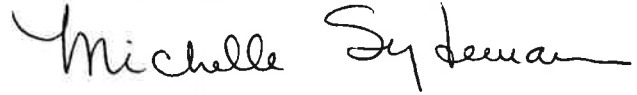
Mr. Marvin Jensen

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We appreciate the opportunity to comment on this draft plan. Please do not hesitate to call this office if we can be of assistance in clarifying these comments.

Sincerely,



Michelle Sydeman
State CSU Coordinator

cc: Commissioner Brady, DNR
Commissioner Collinsworth, DFG
Commissioner Hickey, DOT/PF
Commissioner Kelso, DEC
Mr. Rod Swope, Office of the Governor
Mr. John Katz, Office of the Governor
Alaska Land Use Council Members
Land Use Advisors Committee Members

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