

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

STEVE COWPER, GOVERNOR

STATE CSU COORDINATOR
2600 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2798
PHONE: (907) 274-3528

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

Dear Mr. Evison:

The State of Alaska has reviewed the National Park Service (NPS) draft Environmental Impact Statements (EISs)/Wilderness Recommendations for the Gates of the Arctic National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Lake Clark National Park and Preserve (NPPr). The following letter is submitted on behalf of state agencies and represents a consolidation of state concerns and comments. The state's comments are presented in four sections as follows: Introductory Comments; Comments on the Specific Wilderness Recommendations; General EIS Comments; and Page-specific Comments.

INTRODUCTORY COMMENTS

The State of Alaska recognizes that Wilderness has a legitimate place in the range of public land use classifications which exist in Alaska. However, the state believes some of the NPS Wilderness recommendations contained in the Gates of the Arctic, Wrangell-St. Elias, and Lake Clark EISs are inappropriate. The state has used the following criteria to review the Wilderness recommendations and suggest modifications. Given the NPS's familiarity with these areas, we also urge the NPS to carefully review its draft recommendations to determine whether any lands included in its proposed actions fall within the categories described below. If NPS finds that certain recommended lands do fall in within one or more of these categories, the state requests that NPS either 1) explicitly identify them in the final EISs and provide compelling reasons for recommending them or 2) delete them from the proposed action(s).

Criteria

1. Areas where Wilderness designation would eliminate, reduce or restrict existing uses, structures or activities that are allowed by the Alaska National Interest Lands Conservation Act (ANILCA) and are not degrading resource values;
2. Areas where there is a current or foreseeable interest in or need for:

- a) NPS visitor facilities or recreational development (e.g., visitor centers, campgrounds, trails, lodges, public use cabins);
 - b) developed access (e.g., roads, airstrips, docks, helicopter landing sites);
 - c) state or federal administrative/management facilities (e.g., ranger stations, air/water quality monitoring stations, research facilities);
 - d) utility corridors or facilities (e.g., pipelines, power transmission lines, remote communications equipment);
3. Areas with valid and/or patented mining claims;
 4. Areas that have reasonable potential for inclusion in land exchanges or where park boundaries are in dispute;
 5. Areas where cabins or other structures are used for commercial (e.g., guiding or commercial fishing) or residential purposes;
 6. Areas where mechanized equipment (e.g., chainsaws, generators) has traditionally been used to support commercial, recreational, subsistence, or management activities;
 7. Areas immediately adjacent to roads, mining activity, recreational facilities, land with oil and gas potential or existing leases, or other existing or proposed development;
 8. Areas where off-road vehicles have been traditionally used; and,
 9. Areas immediately adjacent to state lands, navigable waterbodies, submerged lands, tidelands, and possible Revised Statute (RS) 2477 rights-of-way.

In addition, the state requests that the NPS explicitly evaluate its recommendations for conformance with the following September 1986 Department of the Interior (DOI) guidance regarding lands which merit consideration for Wilderness designation:

1. Areas with unique resources or characteristics that may have been overlooked by Congress when it established the Wilderness designations in ANILCA;
2. Areas that, as a result of user trends, land use patterns, and other influences, may have evolved as integral to the Wilderness experience;

3. Adjustments to the boundaries of already designated Wilderness to make boundaries conform more closely to natural features or to facilitate resource management and protection; and,
4. Areas that possess such unique and special qualities that make it appropriate to preclude future NPS management options.

The state is particularly concerned that the Wilderness recommendations meet DOI's first criteria. The exceptional resource values of these park units have already been acknowledged by the creation of the parks. Adding an additional layer of protection to this must be clearly justified. The state requests that NPS explicitly identify the resources and values in each of the areas proposed for Wilderness designation that warrant this added layer of protection.

COMMENTS ON GATES OF THE ARCTIC, WRANGELL-ST. ELIAS, AND LAKE CLARK WILDERNESS RECOMMENDATIONS

Gates of the Arctic National Park and Preserve (Gates):

The state does not support designation of the northeast preserve as Wilderness, as recommended by NPS in the preferred alternative.

Rationale:

- 1) Approximately 85% of Gates (or 7.3 of 8.5 million acres) is already in Wilderness status. The EIS does not present clear rationale for designating an additional 330,846 acres as Wilderness.
- 2) ANILCA provides NPS with ample authority to protect the land and resources of the northeast preserve. Section 201(4)(a) of ANILCA directs NPS to manage the entire park and preserve for the following purposes, among others: "To maintain the wild and undeveloped character of the area, including opportunities for visitors to experience solitude, and the natural environmental integrity and scenic beauty of the mountains, forelands, rivers, lakes, and other natural features; to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other Wilderness recreational activities; and to protect habitat for and the population of fish and wildlife, including, but not limited to, caribou, grizzly bears, dall sheep, moose, wolves, and raptorial birds."

- 3) The state understands that the northeast corner of Gates was designated as non-wilderness preserve by ANILCA primarily to protect opportunities for sport hunting. Most hunters reach this area by aircraft. Although technically Wilderness does not prohibit or restrict aircraft access, Wilderness designation may over time lead to restrictions on mechanized access, including use of aircraft. Because the northeast preserve is remote and inaccessible, as noted on page 14, the state would not support curtailment of current access opportunities.
- 4) The EIS (page 55) notes that the Dalton Highway, part of which was opened to public use in 1981, may spur new development and demands for additional recreational access. Because most of Gates is in Wilderness status, opportunities for the development of visitor facilities within Gates near the road corridor are limited to the northeast preserve. As the EIS states on page 72, "this area would not remain available for possible future development of facilities," if designated as Wilderness. As an example, the docking facilities and primitive campgrounds at Itkillik and Oolah Lakes, which are contemplated under Alternative 1 -- No Action, would likely not be constructed, if this area were designated as Wilderness.
- 5) Local sentiment does not appear to favor the designation of additional Wilderness areas in Gates. Some residents of Anuktuvuk Pass fear that Wilderness designation will lead to eventual restrictions on subsistence hunting in the area. Residents of Coldfoot, Wiseman, and Nolan expressed their opposition to the Wilderness proposal at NPS's Wilderness public meeting on June 8 in Coldfoot.

Lake Clark National Park and Preserve:

The state supports adoption of the Proposed Action (Alternative 1), which does not recommend any additional land for Wilderness designation.

Rationale:

- 1) Approximately 65% of Lake Clark NPPr (or 2.6 of 4 million acres) is already in Wilderness status.
- 2) Several areas of the NPPr which the NPS identified as suitable for Wilderness designation have complex land ownership patterns. In particular, the Cook Inlet coast between Redoubt Bay and Chinitna Bay includes extensive non-federal interests. Wilderness designation in this area would not be appropriate.

- 3) Wilderness designation could limit NPS's ability to respond to the increasing level of visitation expected in the NPPr. The EIS (page 42) estimates that recreational visits will increase from 22,000 (1987 levels) to 133,000 by the year 2020. Wilderness designation would restrict development of visitor facilities (e.g., campgrounds, trails, and public use cabins) and other NPPr uses and activities. The EIS (page 47) describes several effects Wilderness designation can have over the long-term, including effects on "road locations and mileage, landing sites, extent and location of facilities, and degree of controls applied to activities such as mining, vehicle use, open and closed areas of use, and physical developments." The state believes NPS should maintain management flexibility in these areas.

Wrangell-St. Elias National Park and Preserve:

The state supports NPS's objective to create more identifiable field boundaries for Wilderness areas and to eliminate the potential for land uses that might conflict with Wilderness and/or park/preserve purposes. To further these objectives, the state requests that the NPS make the following changes to the Proposed Action (Alternative 2).

Recommendation:

Modify the Wilderness boundary in the preserve adjacent to the Malaspina Glacier to follow more recognizable hydrographic features. (See Map A.)

Rationale:

- 1) This recommendation would exclude a large, un-named state-owned lake from the Wilderness boundary.
- 2) This boundary follows more easily identifiable hydrographic features and elevation contours. The glacier's edge has substantially retreated since the topographic map was made in 1961. The exposed land has re-vegetated in recent years and much of the proposed boundary is no longer recognizable in the field, even though it appears to make sense on the map. The state's proposed boundary follows more definable water bodies or steep slopes.
- 3) The lakes and washes in this portion of the preserve are relatively well used by nearby Yakutat residents for aircraft landings, boats, hunting, fishing, etc. These use levels make this area undesirable for Wilderness.

Recommendation:

Delete the Bremner Bar from the Bremner River Wilderness recommendation. (See Map B.)

Rationale:

- 1) The Bremner Bar is a broad, sandy, partially vegetated river bar, portions of which are likely state-owned based on the navigability status of the Copper and Bremner Rivers. Given that the land status of this bar has not been determined and it would be difficult to base a Wilderness boundary on such uncertain status, the state recommends that the Bremner River Wilderness boundary end at the point that it enters the Copper River flat lands.
- 2) The modified boundary will be easier to locate in the field, and will thus be more manageable.

Recommendation:

Move the northwest Wilderness boundary from the Kotsina River to Copper River and Copper Lake from the 3,000 foot contour, as proposed, to the 4,000 foot contour. (Map C shows a portion of this boundary adjustment.) This revision would also exclude the broad valley north of the Copper Glacier and the isolated mountain in T. 6 n., R. 9 E.

- 1) Much public use of the flanks of Mt. Drum, Mt. Sanford, and Mt. Wrangell occur between 2,500-3,500 feet. This band contains numerous winter and summer trails, cabins, and air access points (strips and gravel bars). To reduce management conflicts, these areas should be excluded.
- 2) A major access trail from the Kotsina River crosses several drainages in this area, including the Nadina, Dadina, Chetaslina, and Cheshnina Rivers. Both the existing and proposed Wilderness boundary cross back and forth over this trail. The trail is used by motorized vehicles, including ORVs, and should be excluded from Wilderness.
- 3) The 3,000 foot contour proposed by NPS generally follows gentle slopes and would therefore be more difficult to identify in the field. The 4,000 foot contour more closely corresponds to steeper slopes, making field identification and management easier.

Recommendation:

Exclude Sheep Lake (T. 6 N. R. 11 E.) and Grizzly Lake (T. 5 N. R. 11 E.) from the Wilderness recommendation. This could be accomplished by moving the boundary to the 4,000 foot contour along Goat Creek to the junction of Jacksina Creek. (See Map D.)

Rationale:

- 1) These lakes and the access trail to them are heavily used and therefore inappropriate for Wilderness. Access to the lakes and surrounding area has traditionally been gained by aircraft, ORV's and horses, creating a difficult management situation in its present status. Excluding the lakes and trail from Wilderness will help alleviate these management conflicts.
- 2) The 4,000 foot contour boundary would be easier to recognize in the field than the straight line boundary cutting across Goat Creek.

Recommendation:

Redraw the Wilderness boundary between Goat Creek and Gold Hill along more easily recognizable features. (See Map D.) From Goat Creek, the boundary should follow the south side of the valley floor along Pass Creek, excluding the existing trail from Wilderness. At the pass, the boundary should follow Wait Creek to the 3,000 foot contour, then to the north end of Gold Hill at the same elevation.

Rationale:

- 1) Improves identification of the boundary in the field.
- 2) Excludes Pass Creek trail from Wilderness.

Recommendation:

Modify the boundary from Gold Hill to the Nabesna Glacier along the 4,000 foot contour. (See Map E.)

Rationale:

- 1) This relatively minor change places the Wilderness boundary along the steeper slopes above the Nabesna River, thereby alleviating possible confusion in and south of the Fish Creek drainage. The crossing of the Nabesna Glacier could remain unchanged or be moved to the 4,000 foot contour.
- 2) The 4,000 foot contour more nearly approximates the original congressional boundary.

Recommendation:

Exclude the portion of the upper Chitina Valley in the vicinity of Bryson Bar from existing Wilderness. (See Map E.) Ideally, the state suggests that the Wilderness boundary follow Canyon

Creek to T. 7 S., R. 18 E., then to the slope of Canyon Creek at the 4,000 foot contour, then continuing east across to Barnard Glacier, then to the face of the Chitina Glacier, before re-joining the park/preserve boundary south of the Chitina River. At a minimum, the land below the 2,000 foot contour in this area should be deleted from Wilderness.

Rationale:

- 1) This area is heavily used for recreation, including use of aircraft, ORVs, and other mechanized equipment. It has reportedly been a difficult area for NPS to manage because of traditional uses, including extensive recreational access. This boundary adjustment would reduce these conflicts.
- 2) This area contains active horse grazing leases, (e.g., at Bryson Bar.) Wilderness designation may jeopardize these leases and the historical use of horses in the upper Chitina Valley.

Recommendation:

Delete the remaining section of the Beaver Creek Trail between Beaver Lake and Horsefeld. (See Map F.)

Rationale:

- 1) We appreciate the fact that the NPS has proposed deletion of Beaver Lake and that the small addition to the south avoids the Beaver Creek Trail. The remaining segment of trail east of Beaver Lake, however, is still in Wilderness, which legally precludes the ATV use this trail has historically accommodated. It would make sense to revise the Beaver Lake deletion to ensure that the entire trail is outside the Wilderness boundary for management consistency.

Recommendation:

Delete the proposed Wilderness recommendation encompassing the south slope of MacColl Ridge and the adjacent Chitina River.

Rationale:

- 1) This area is relatively heavily used at this time and historically has been used extensively. While the current types of use are technically compatible with Wilderness management according to ANILCA, the state is concerned that these activities (e.g., air access) may be restricted in the future to protect Wilderness values. Further, the state

believes existing use levels on MacColl Ridge are not compatible with Wilderness designation.

- 2) The proposed addition includes the navigable Chitina River. The state opposes the inclusion of state-owned navigable waterways in new Wilderness recommendations.

Some of the Wilderness boundaries that the NPS and/or the state are proposing to adjust to ease management and increase recognition in the field are also park/preserve boundaries. In most instances, if the Wilderness boundary is adjusted, the corresponding park/preserve boundary should also be adjusted so that they continue to conform. We recognize that changes to the park/preserve boundaries are not addressed in these EISs; however, we wish to raise the issue for consideration as the Wilderness recommendations are forwarded to Congress. If the Wilderness boundaries are improved to follow more readily discernible geographic features, then it makes sense for the park/preserve boundaries to follow the same features, unless there is some negative consequence to doing so. This rationale applies equally to Wilderness additions as well as deletions (e.g., at Icy Bay, Goat Creek, Copper Lake, Bremner Bar, and the west flank of Mt. Drum.)

GENERAL COMMENTS WHICH APPLY TO ALL THREE EISs

- 1) The documents do not adequately justify NPS Wilderness recommendations, i.e., why certain lands are recommended for Wilderness designation and others are not. It is not clear how NPS determined which suitable parklands should be recommended for designation. The state recommends that the NPS add a new section to the final EISs which describes the criteria NPS used to develop Wilderness recommendations and identifies the specific resources and values it is seeking to protect.

This is particularly important in the case of proposed actions. We note that the U.S. Fish and Wildlife Service, in its Comprehensive Conservation Plans/Environmental Impact Statements/Wilderness Reviews, includes a chapter titled "Evaluation of Alternatives" which presents evaluation criteria, compares alternatives, assesses the relative costs of each alternative, and explains why the preferred alternative was chosen. (See draft Arctic National Wildlife Refuge CCP/EIS, pages 384-399.)

Because Wilderness limits management options, opportunities for development, and certain public uses of parklands, the state cannot support the designation of additional

Wilderness unless a compelling reason exists for such designation. The state urges the NPS to include additional rationale for its Wilderness recommendations in the final EISs.

- 2) The documents do not adequately describe the differences between management of Wilderness and non-wilderness parklands. Because these differences are not clearly delineated, the public cannot fully assess the impacts of Wilderness designation. As we have urged in the past (see November 24, 1986, correspondence), the state recommends that the NPS include in each document a table which lists activities, structures, and uses which are affected by Wilderness designation. The table included in the Alaska Land Use Council's Draft Wilderness Review Guide (1987) could be used as a basis for this list. The state suggests that the following items, among others, be included in the list: 1) visitor centers, public use cabins, and campgrounds; 2) roads, airstrips, utility corridors, and docks; 3) guide cabins and camps; 4) use of chainsaws and generators; 5) use of off-road vehicles and helicopters; 6) use of inholdings and adjacent lands; 7) commercial fishing; and 8) use of temporary facilities.

The state notes that there are many activities, uses and structures which NPS may manage more restrictively in Wilderness than in non-Wilderness parklands, even though there are no laws or regulations which specifically mandate increased restrictiveness for these uses. (See Lake Clark EIS, page 47, paragraph 1.) The state therefore requests that NPS more clearly describe how Wilderness designation will affect NPS management philosophy and policies. The state is particularly interested in how Wilderness designation will affect NPS discretionary decisions, e.g., issuance of special use permits and the conditions attached to these permits.

As an example, the NPS considers development of a 30-room lodge on the Harding Icefield in the Kenai Fjords NP to be a "reasonably foreseeable action" if no adjacent lands are designated as Wilderness. If adjacent lands are designated as Wilderness, the NPS indicates that a 20-room lodge is a "reasonably foreseeable action." The state is not aware of any laws or regulations which specifically address lodge size; however, NPS appears to have a management preference for smaller developments on lands adjacent to Wilderness areas. The state believes it would be useful for the public to better understand the effect of Wilderness designation on discretionary NPS administrative decisions.

- 3) Each of the EISs (page 7) notes that the validity of RS 2477 rights-of-way and the navigability of rivers (as it relates to state ownership) will be determined on a case by case basis, and that navigable rivers and valid RS 2477 rights-of-way would not be designated as Wilderness. This statement should be expanded to explain how navigability determinations and RS 2477 validity determinations which are concluded after Congress has acted upon these Wilderness recommendations will be dealt with. Specifically, the state requests that the intent of this paragraph be clarified with the following insert at the end of the last sentence: ". . . even if the navigability or validity determination is made after the surrounding area has been designated as Wilderness." Further, we request that this intent be included in any Wilderness legislation forwarded to Congress by the NPS.
- 4) The EISs do not adequately stress that the development and use scenarios presented for each alternative are speculative. Since these scenarios provide the basis for assessing the impacts of Wilderness designation and may affect public opinion regarding the merits of designating Wilderness, the EISs should repeatedly stress that the scenarios represent the NPS's best guess at future needs and developments. Actual developments and associated impacts may be much greater or lesser than described. The state suggests that the NPS remind readers at the conclusion of each impact analysis that the scenarios and impacts analyses are hypothetical. The state further suggests that the EISs clarify that, based on current General Management Plans (GMPs) for these units, many of the developments contained in the scenarios would not receive approval from the NPS.
- 5) The EISs do not adequately describe the relationship between the management directions established in the GMPs for these units and the Wilderness recommendations. The state requests that the final EISs discuss this relationship. In particular, the GMPs indicate that NPS intends to maintain options for future visitor-related development. The EISs should clearly discuss how this objective is affected by the Wilderness recommendations. The state requests that where Wilderness will preclude opportunities for future visitor developments, the EISs identify alternative development sites; provide clear rationale for proceeding with the recommendations; or exclude the area(s) from the Wilderness recommendations.
- 6) The EISs state that "helicopter landings are not permitted in Wilderness except when necessary for administrative purposes such as search and rescue activities, NPS research for management purposes, fire management" (Gates, page 7).

The state requests that the EISs clearly indicate that state agencies with management and research responsibilities within park units (e.g., the Alaska Departments of Fish and Game, Public Safety, Natural Resources, and Environmental Conservation) may also land helicopters in designated Wilderness when necessary.

- 7) The maps included in the EISs are virtually useless for finding landmarks addressed in the respective texts. The state requests that at least one map which shows pertinent features be included in each EIS.

Further, we strongly urge that the final documents be accompanied by more detailed inset maps showing the proposed new boundaries in greater detail. This is especially critical in the Wrangells, for example, where small but significant additions and deletions are proposed to fine-tune existing boundaries. It is impossible to locate the actual boundaries based on the proposed action map and the limited narrative descriptions. The state's specific comments on the Wrangells are accompanied by more detailed maps which could be used as a pattern for the final documents.

- 8) Each EIS presents tables depicting estimated subsistence resource harvest levels. (See pages 51-51 in Gates; pages 36, 48, and 49 in Lake Clark; and pages 44-45 in Wrangells.) The headings for these tables are inadequate for explaining their content and could be problematic if the tables were taken out of context. The EISs indicate that the subsistence harvest levels depicted in these tables are "very rough estimates extrapolated from a variety of sources listed in the bibliography . . ." We recommend further discussions of how these figures were developed and what the margin of error may be. The Alaska Department of Fish and Game, Division of Subsistence technical reports are among the sources cited, but it appears that considerable guess work was also used. While we appreciate the effort to estimate subsistence harvest levels in the park units, we believe a more detailed explanation is necessary to assure proper use of this information in the future. If additional explanatory material cannot be added to the text, we recommend deletion of these figures to avoid basing decisions on potentially invalid or poor information.

In addition, the term "subsisters" should be deleted wherever it occurs in the EISs and replaced with "local rural residents" or similar language.

- 9) The state objects to the proposed NPS requirement that subsistence users obtain a permit for use of chainsaws in designated Wilderness and non-wilderness areas. The state believes this requirement imposes an unnecessary regulatory burden on local rural residents. The cutting of wood for heating, temporary shelters, and trapping materials has gone on for decades. In addition, the state notes that the U.S. Fish and Wildlife Service, a sister agency of the NPS, allows subsistence use of chainsaws without a permit in Wilderness and non-wilderness areas.

The state also disagrees with NPS's determination that use of motors (e.g., generators) is prohibited in Wilderness areas in Alaska. As stated in each EIS, ANILCA modifies implementation of the Wilderness Act in Alaska. Numerous sections of ANILCA (e.g., Section 1315) permit uses in Alaska Wilderness that are not permitted in Wilderness areas in the lower 48 states. The state believes that Section 1316 of ANILCA, which provides for the use of "temporary facilities and equipment," authorizes use of motorized equipment in Alaska Wilderness areas if directly and necessarily related to the taking of fish and wildlife. The state supports a policy of allowing limited use of motorized equipment in support of traditional activities (e.g., guiding and subsistence) where it would not significantly detract from Wilderness values.

PAGE-SPECIFIC COMMENTS

Gates of the Arctic NPPr:

Page 14. The northeast preserve unit description states "There is no record of any ATV access for subsistence activities in the unit." Although this statement may be accurate based on available information, the northeast preserve unit is used for subsistence purposes and ATV use there might at some point become a desired form of access as subsistence use areas change and animal migration routes change. We request that the EIS reference this possibility. In addition, we recommend the NPS cite the ATV study it funded: Edwin S. Hall, Jr., Craig Gerlach, and Margaret B. Blackman, 1985. In the National Interest: A Geographically Based Study of Anuktuvuk Pass Inupiat Subsistence Through Time. Volumes 1 and 2. Barrow: North Slope Borough.

Pages 19-20 & 81-89. The discussion of alternatives 3 and 4, which call for the southwestern portion of the preserve to be included in Wilderness, should address the relationship between the corridor designated by section 201(4)(b) of ANILCA and

possible Wilderness designation. The state strongly opposes designation of the southwest preserve as Wilderness because of this identified access need.

Page 48, second full paragraph. We recommend that Bettles and Evansville be listed as separate communities.

Page 49. The 1985 population estimates for park area communities listed in Table 5 appear on page 51 and should be added to the table to more accurately depict current demographics. The current format implies a high rate of growth, which is not the case in most communities involved.

Page 51, Subsistence Uses, first paragraph. We request that the text clarify whether the harvest data presented reflect the subsistence harvest levels of park and park area residents living outside established communities, but using park resources.

Page 52, final paragraph. We suggest that the NPS cite the source of the statement that most park area residents heat their homes with fuel oil.

Page 53, Community Subsistence Areas Map. This map benefits tremendously from the March 1988 errata sheet that the NPS distributed. In fact, we recommend that the type of information included in the errata sheet be presented in each draft EIS. We are uncertain if the map depicts areas used for caribou hunting by park and park area residents living outside the established communities. In addition, the U.S Fish and Wildlife Service report referenced in the errata sheet should be added to the bibliography.

Page 53, Subsistence area map. It appears that the locations of Alatna/Allakaket and Bettles/Evansville have been reversed on this map.

Page 55, Access and Transportation Section. We request that this section recognize snowmachine access from the Dalton Highway and ATV use.

Page 58, paragraph 5. Harvest tickets are also required to be returned within a specific number of days after a successful hunt.

Page 61, paragraph 7. The state notes that "tundra" airstrips should not be considered abandoned just because they appear to be unmaintained. Such strips are traditional areas protected, in our view, by ANILCA.

Page 69, paragraph 3. The assertion that Wilderness values will shrink, if no additional Wilderness is designated, is

questionable. Since NPS has management authority over all federally-owned land in this area, the only way this land will be developed is under NPS's express authorization. In addition, we note that the development scenarios described in the EIS would not result in a significant reduction in Wilderness acreage.

Pages 76, paragraph 3. We request clarification of the statement: "the northeast would be a Wilderness gateway to the park from these outside developed areas." Access through the preserve to the park is not likely. In addition, access and use of the preserve may over time be restricted by Wilderness designation.

Page 80. We recommend that under "Relationship Between Short-term Use" the NPS acknowledge that approximately 7.3 million acres of this unit are existing designated Wilderness.

Page 83, paragraph 4. We are uncertain as to the meaning of the term "provide a buffer of Wilderness for lands adjacent to the 100-mile upper Kobuk River." Page 96 of the GMP clarifies why special boundaries are not given to the river: "that the park status (being managed as Wilderness) provides the same protection as having the boundary included."

Page 106, Bibliography. We request that the "Alaska Department of Fish and Game, 1985b" citation be attributed to the report authors, James R. Marcotte and Terry L. Haynes.

Wrangell-St. Elias NPPr

Page 7, last paragraph. The typographical error which indicates that RS 2477 is codified as 430 SC 932 should be corrected to read 43 USC 932.

Pages 25 & 26, Alternatives 3 & 4. Both of these alternatives recommend Wilderness designation over each of the trails into Chisana. While the EIS implies that occasional use of these trails would be allowed under Wilderness designation, their existence and possible need for future improvement should eliminate them from consideration as Wilderness.

Page 41, final paragraph. We recommend that the range of community per capita cash income levels be presented to more accurately characterize the role of the cash economy in park area communities. The inclusion of income data for Valdez (which is not a resident zone community for this park unit) substantially skews the overall per capita income levels for the majority of the park area communities, since few of the communities derive substantial benefits from the oil pipeline.

Page 42, Subsistence Use, first paragraph; and page 111, final paragraph. Cordova is not a resident zone community, which

distinguishes it from other communities listed in these sections. The 1980 population of Tonsina was 130. We request that the EIS indicate what years apply to the other figures that are represented.

Page 43, Subsistence Map. Mapped data are not available for all resident zone communities for this park unit (e.g., McCarthy and Tok), so the map should not be construed as a comprehensive depiction of moose hunting areas. We recommend that the years depicted on this map be added to the map legend.

Page 44, Table 3. There appear to be significant errors in this table. For example, the annual caribou harvest for the resident zone communities in the region is considerably higher than 50 animals. More than 67 moose are taken in a typical year. The deer harvest in the park unit for resident zone community residents is minimal. The mountain goat harvest figures seem too high. Few salmon are harvested within the park boundaries and local harvest of sheefish and suckers is very low. Such errors as these illustrate our concern with the presentation of harvest information in the draft EIS, especially when the procedures used are not described. As work proceeds on the computerized community data base files being developed by the Alaska Department of Fish and Game, Division of Subsistence in cooperation with the NPS and other federal agencies, we expect to be in a better position to provide estimates of community resource harvest levels.

Page 46, Access and Circulation. This section states that ferry service is available to Valdez only during summer. Ferry service is actually available to Valdez, on a reduced schedule, from Cordova, the Kenai Peninsula and Kodiak Island during the winter season also. It should also be pointed out that while Haines and Valdez are both served by the state ferry system, there is no direct or indirect service between them. This document states that the park is road-accessible from Haines, which is 500 miles away; it would be more useful to say that the park is accessible from the Alaska Highway via the Tok Cutoff. This would cover traffic coming into Alaska by ferry through Haines as well as by highway through Whitehorse.

Description of the highway system in and around the park should note that consideration is being given to construction of a road from Chitina to Cordova. This route is expected to follow the old railroad grade located directly across the Copper River from the southwest section of the park.

Page 51, third paragraph. We are unaware of any "commercial hunting" activities occurring in the Nabesna Road area or anywhere else in the state. In addition, we note that commercial

fishing activities by local residents do not occur in the Nabesna Road area.

Pages 53-101, Environmental consequences. This section indicates several times that no construction of new access roads within the park is foreseen. We suggest that, given the amount of private and state land within the park, it would be within reason to envision some new access development in the future. The large block of state and Native land selections east of the Copper and north of Chitina is one area where new access may be developed. Year round surface access to Chisana is another example.

Page 60, second full paragraph. Currently, there is a drawing permit hunt for caribou within the preserve.

Page 94, Impacts on Subsistence. Caribou contribute to the household diets of park area residents, and, in some instances, may surpass fish in terms of pounds consumed.

Lake Clark National Park and Preserve:

Pages 15, 19, 21 and 37. These maps portray the boundary of the park crossing state tidelands and navigable waters. The state reiterates its objection to these NPS proposed boundaries. (See state correspondence to NPS, dated August 4, 1986.)

Page 35, Subsistence Uses, first paragraph. The area of prime subsistence is not confined to the relatively small area from Newhalen to Iliamna. A substantially larger area is used for moose hunting alone, based on the map on page 37.

Page 37, Subsistence Map. We recommend that this map also depict areas used in and near the park by the community of Lime Village for harvesting moose. (See Alaska Department of Fish and Game, Subsistence Division, Technical Paper #80, "Land Use and Economy of Lime Village," by Priscilla Kari.) The map legend should also indicate the years reflected on the map since, as the text correctly explains, harvest patterns are dynamic and subject to change over time.

Pages 38 and 39. There appears to be an inconsistency in the NPS position regarding land uses which could adversely affect subsistence harvest levels. In the case of adjacent state-managed land, the NPS opposes remote settlement because it might increase subsistence harvest levels of wildlife populations. In the case of NPS-managed lands, the ANILCA Section 810 evaluation on page 67 does not acknowledge that the predicted increase in sport hunting in the preserve could also affect subsistence harvest levels. It is our opinion that both of these increases in both human occupancy and use would affect subsistence harvest levels.

Page 40, Access and Circulation. Numerous landing sites known as tundra strips also exist. We request that the draft EIS acknowledge the presence of these strips and provide assurance that traditional access on these sites will be allowed to continue, consistent with Title XI of ANILCA.

Page 41, paragraph 2. Boats used by residents and outfitters both within and adjacent to Lake Clark also are sometimes equipped with jet motors. In addition, recreation use of snowmobiles occurred prior to passage of ANILCA.

Page 45, paragraph 2. The EIS includes a long discussion of the impacts of aircraft overflights in areas not recommended for Wilderness designation. However, the document does not clarify that such overflights would not be prevented by Wilderness designation. The EIS also addresses possible developments on private lands in a similarly misleading fashion. Title I specifically excludes private land from regulations applicable to federal conservation units. Therefore, the use of private lands and any associated impacts will not be affected (i.e., minimized) by Wilderness designation.

Page 45, paragraph 2. The last sentence in this paragraph refers to ". . . the additional protection of a Wilderness buffer on adjacent lands . . ." of wild rivers. The document should describe what additional protection would occur as a result of Wilderness designation on these lands.

Page 47, paragraph 1. This paragraph describes additional activities which would negatively affect Wilderness values under the no-action alternative. As previously noted, many of these activities could occur even within a Wilderness area, based on provisions contained in ANILCA. Consequently, the impacts described in this section could occur regardless of whether or not these lands are designated as Wilderness.

Page 47, paragraph 3. This paragraph states that the no-action alternative will "result in major deterioration of Wilderness character." The state questions this conclusion, based on the 30-40 year development scenario provided for this alternative. The scenario includes development of 5 primitive campgrounds, 9½ miles of new or upgraded trails, 5 new ranger stations, 4 air and water quality monitoring stations, and one mining claim group. The EIS estimates that these developments would directly affect less than 15 acres out of the approximately 4 million acre NPPr. In addition, we note that these developments are speculative.

Page 48, Table. If we read this table correctly, residents of the preserve are estimated to have harvested 107 dall sheep" in a relatively typical" year, but only 7 within the park unit. We

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question if local residents actually harvested 107 sheep and suspect this number refers to the number of sheep harvested by all hunters in areas west of the Alaska Range.

Page 61. The statement "hunting is permitted in the preserve" should be expanded to reflect that subsistence hunting is also allowed in the park portion of the Lake Clark unit.

On behalf of the State of Alaska, thank you for the opportunity to review these draft EISs. If we can be of assistance in clarifying the state's comments, please do not hesitate to call this office.

Sincerely,

Robert L. Grogan
Director


Michelle Sydeman
CSU Coordinator

cc: Commissioner Judy Brady, DNR
Commissioner Don Collinsworth, DFG
Commissioner Dennis Kelso, DEC
Commissioner Mark Hickey, DOT/PF
Commissioner Tony Smith, DCED
Mr. Rod Swope, Office of the Governor
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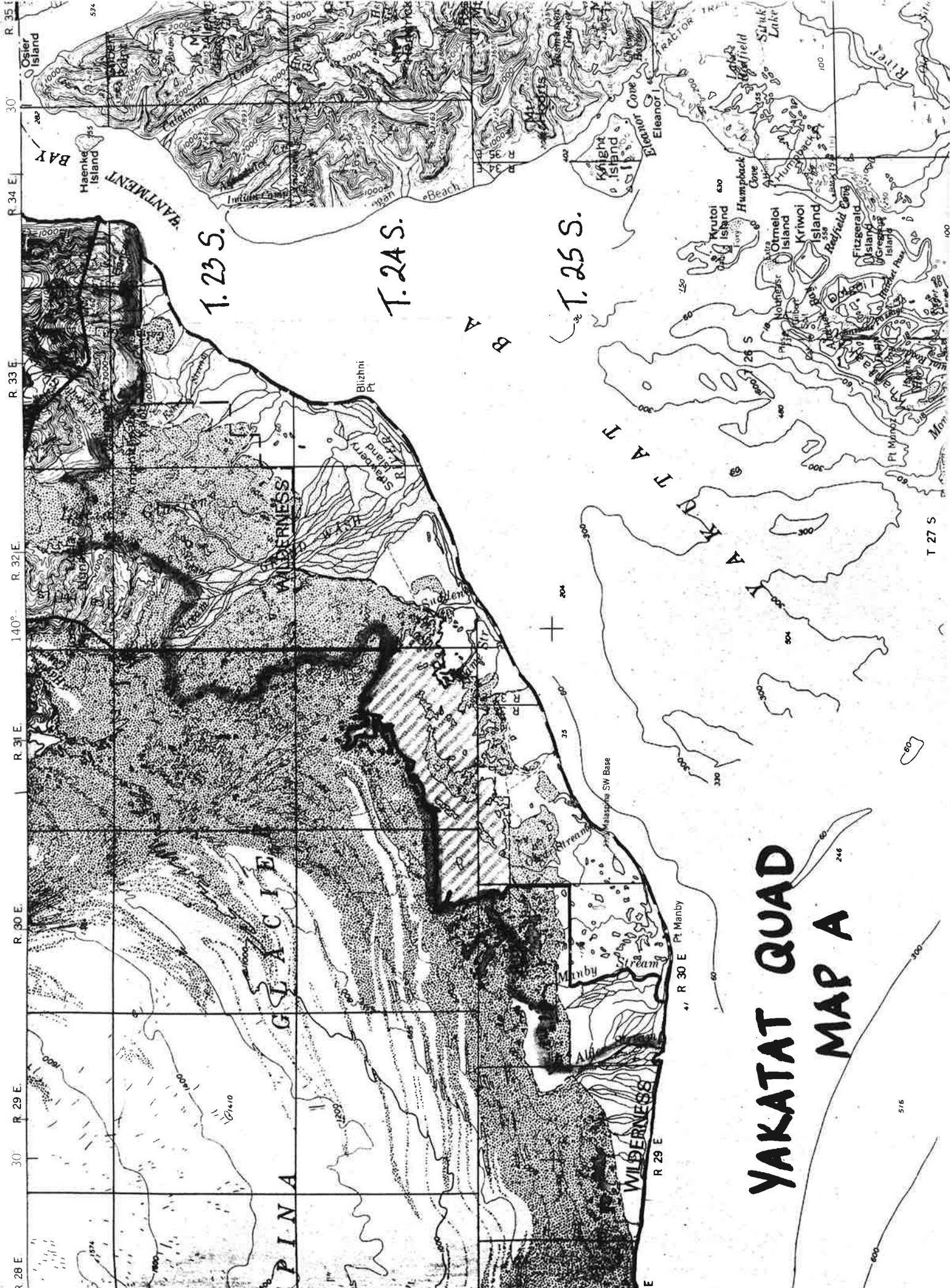
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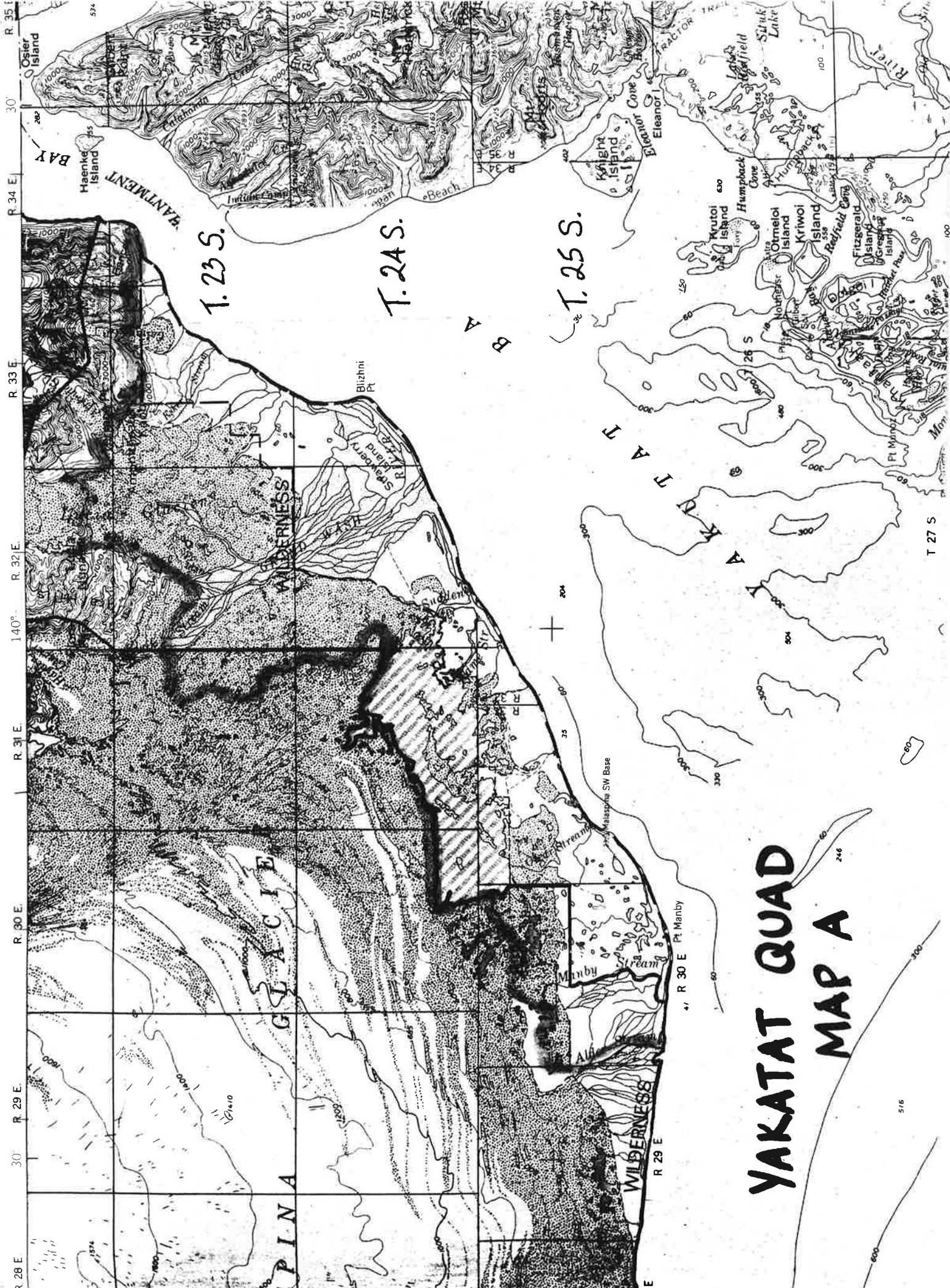


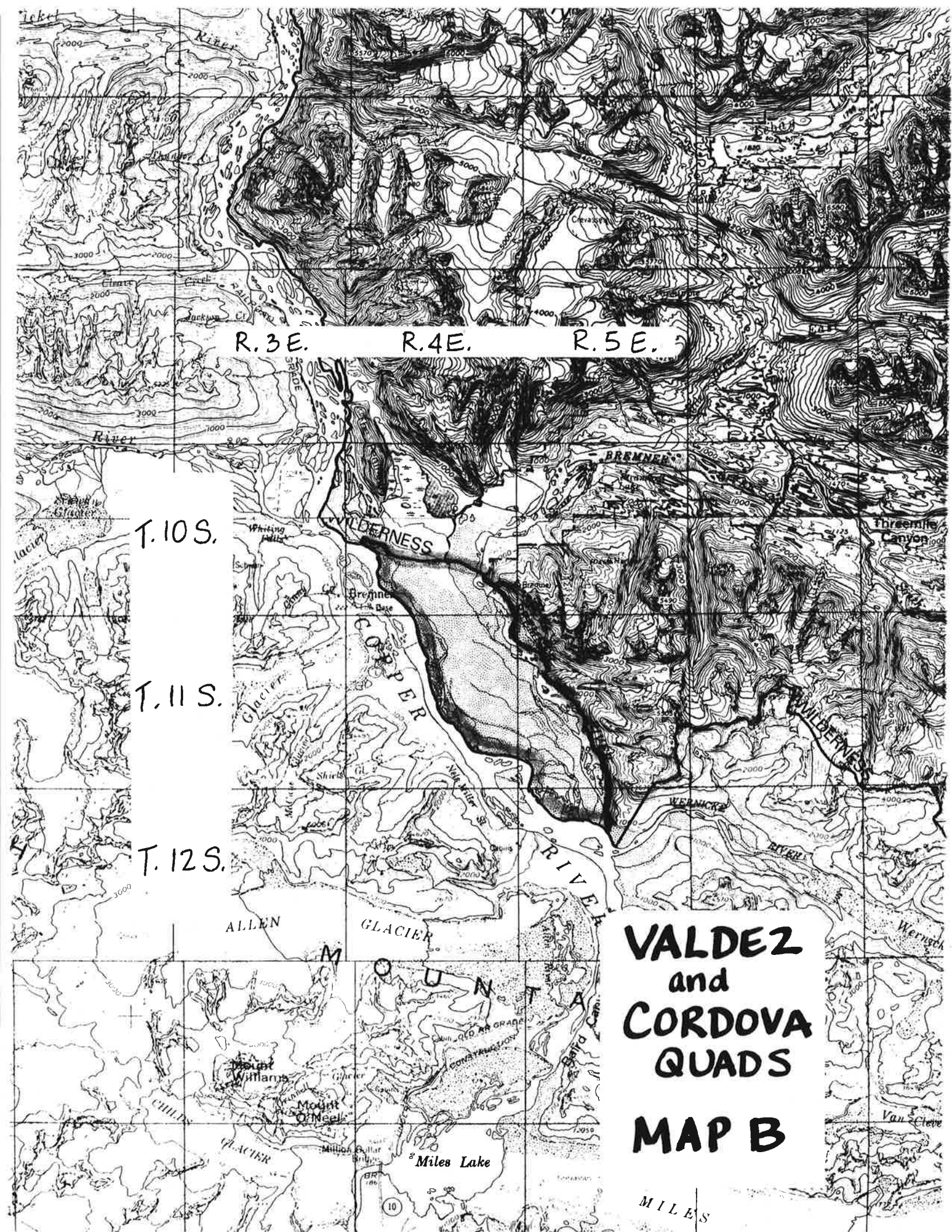
YAKATAT QUAD MAP A

T. 23 S.

T. 24 S.

T. 25 S.





R. 3 E. R. 4 E. R. 5 E.

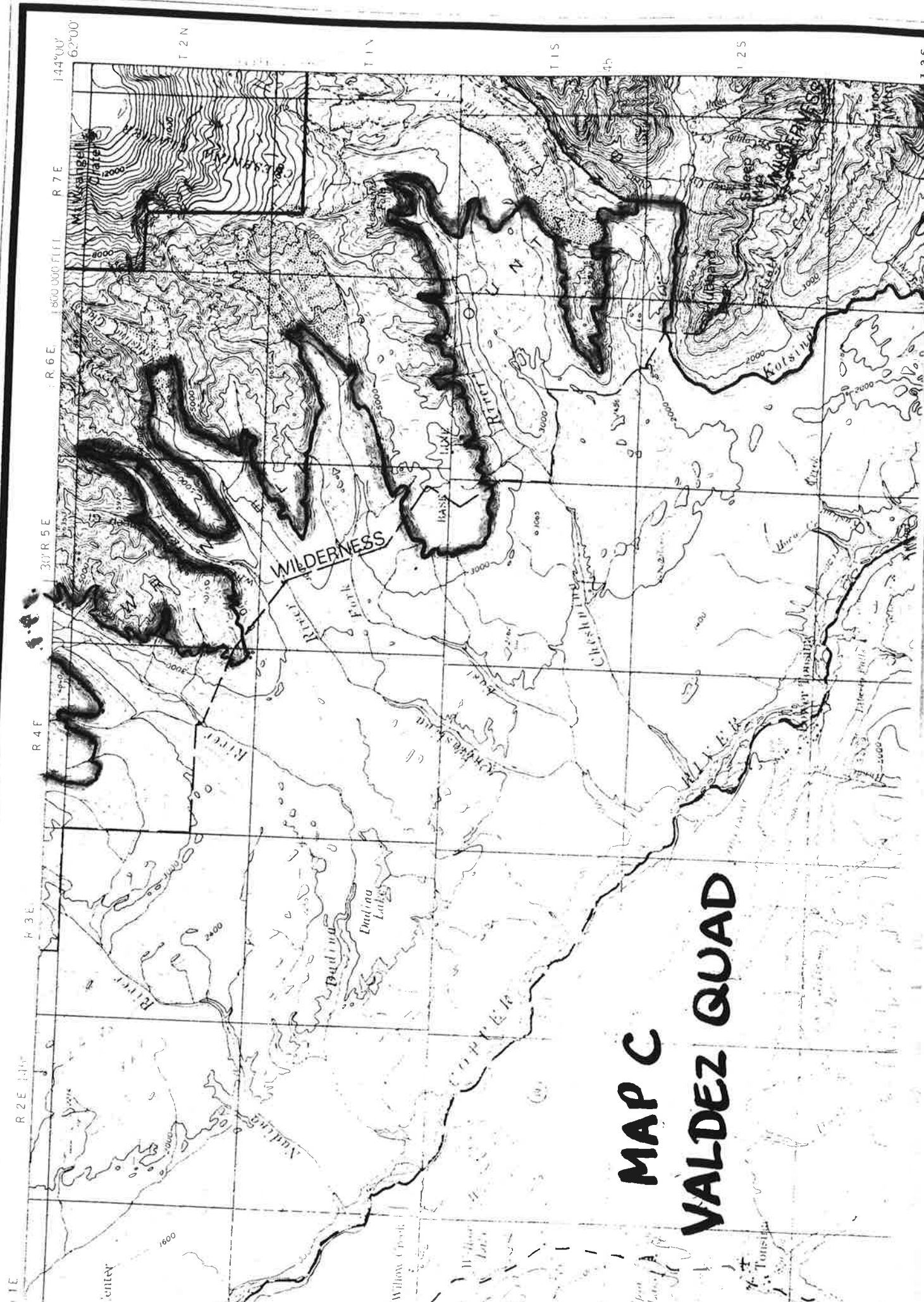
T. 10 S.

T. 11 S.

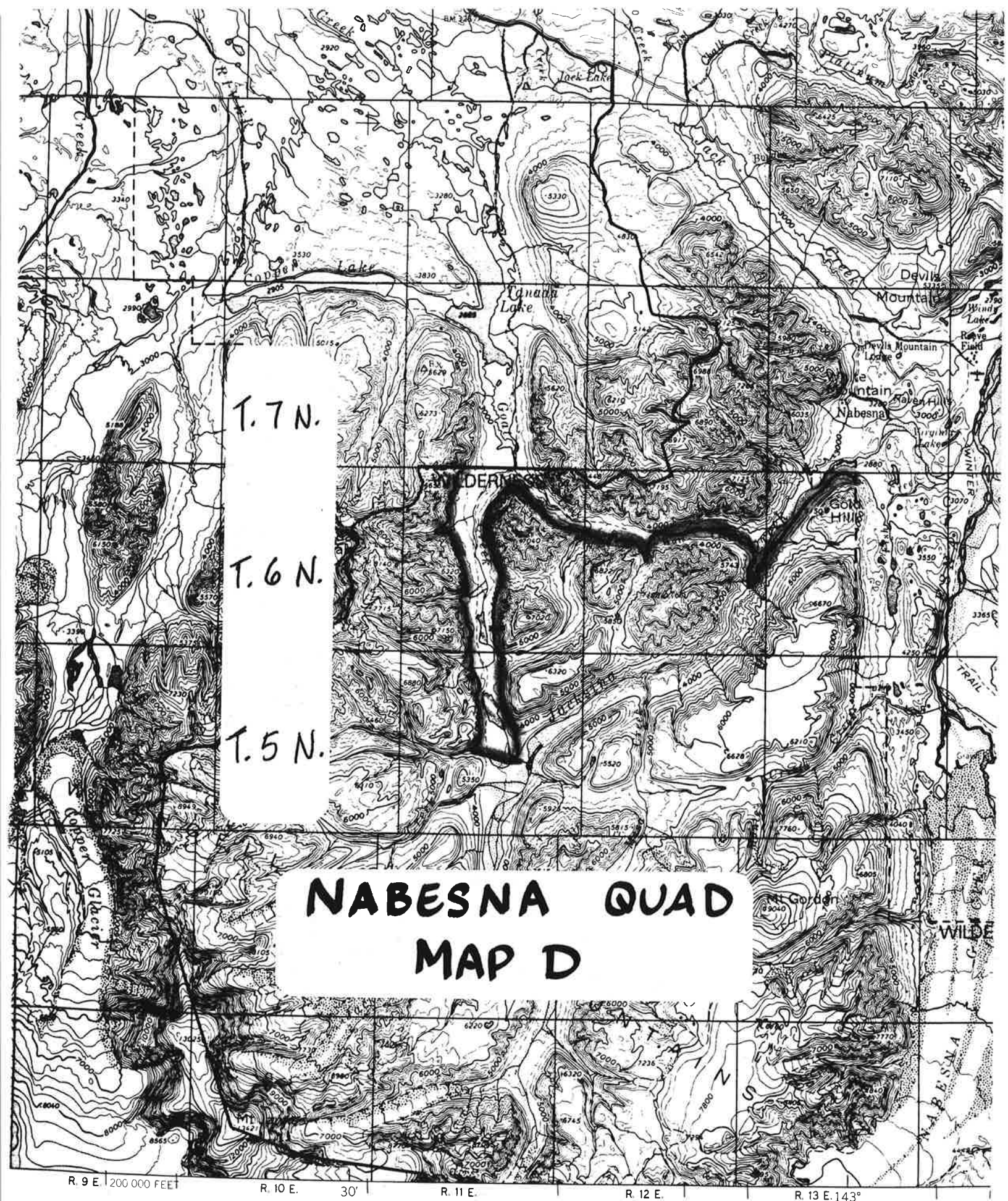
T. 12 S.

**VALDEZ
and
CORDOVA
QUADS
MAP B**

MILES



MAP C VALDEZ QUAD



T. 7 N.

T. 6 N.

T. 5 N.

NABESNA QUAD MAP D

R. 9 E. 200 000 FEET

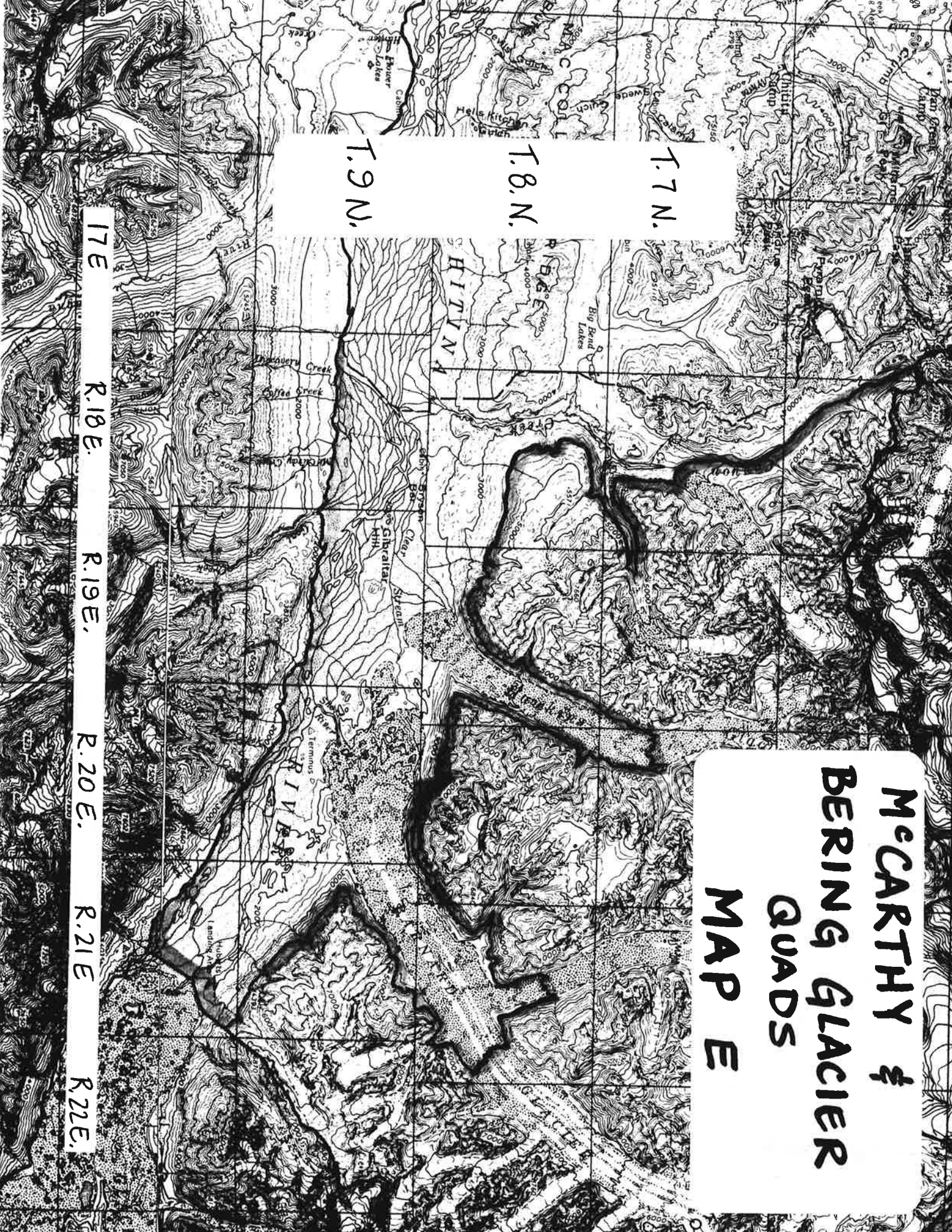
R. 10 E. 30'

R. 11 E.

R. 12 E.

R. 13 E. 143°

**McCarthy &
BERING GLACIER
QUADS
MAP E**



17E R.18E. R.19E. R.20E. R.21E. R.22E.

1.7N.
1.8N.
1.9N.

NABESNA and MCARTHY QUADS

MAP F

