

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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Aug. 12, 1988

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

Dear Mr. *Boyd* Evison:

The State of Alaska has reviewed the National Park Service (NPS) draft Environmental Impact Statement (EIS)/Wilderness Recommendations for Cape Krusenstern National Monument. The following letter is submitted on behalf of state agencies and represents a consolidation of state concerns and comments.

In summary, due to the numerous potential conflicts and lack of compelling rationale for a Wilderness designation in Cape Krusenstern, the state recommends that NPS select the no action alternative in the final EIS. The state's comments are presented in four sections as follows: Introduction; Wilderness Recommendations; General EIS Comments; and Page-specific Comments.

INTRODUCTION

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 that a portion of the NPS Wilderness recommendation contained in this EIS is 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 EIS 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;

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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.

Cape Krusenstern National Monument Wilderness Recommendations

Recommendation:

Delete state lands, including state-owned tide and submerged lands, from the Wilderness recommendation.

Rationale:

It is unreasonable to consider that the state might someday convey ownership of the state-owned lagoons to the NPS, as could be implied by the discussion on page 17. The state has very limited authority to convey tide and submerged lands, and this authority rests only with the state legislature. Since there is virtually no chance that the NPS will acquire these lands, such a contingency-based recommendation is misleading and inappropriate.

If NPS has certain management preferences for state-owned lands, a cooperative agreement would be a more reasonable and potentially productive method of influencing management of these areas.

Recommendation:

Delete coastal areas from the Wilderness recommendation.

Rationale:

- 1) The coastal fringe contains numerous inholdings, including over 70 Native allotments. These inholdings and associated

uses will make Wilderness management more difficult. The coastal fringe is also used extensively for commercial and subsistence fishing support facilities, ORVs, and mechanized equipment.

- 2) A well-used trail (and possible RS 2477 right-of-way--the Coastal Winter Trail) runs along the coast. Associated with this trail are other access trails and shelters. Avoiding Wilderness in the vicinity of this trail will help insure that year-round traditional activities and access patterns are protected from more stringent regulation.
- 3) If state lands (e.g., offshore oil and gas activities in the Hope Basin), are ever developed, a modified boundary would protect the Wilderness area from the possible visual and other impacts of adjacent development. While no oil and gas lease sales in the Hope Basin are currently scheduled, they have been discussed and could occur in the future.

Recommendation:

Delete from Wilderness the portions of the monument that are crossed by other trails that have been used for subsistence and other traditional uses. (See attached map.)

Rationale:

Wilderness would not automatically preclude the extensive use and access patterns in Cape Krusenstern. However, we believe that, over time, management of these uses may become unnecessarily stringent under a Wilderness designation. The state's December 5, 1986, letter to the NPS provided information on trails used for access to inholdings, subsistence and other traditional uses. In the absence of a thorough discussion of these trails and related cabins and fishing sites, it appears that Wilderness designation could significantly impact these uses. Thus, we recommend that the NPS delete these trails from Wilderness, or provide assurances that existing patterns of use and mechanized access (including ORVs and snowmobiles) will be maintained in the future if any areas are recommended for Wilderness.

Recommendation:

Delete upland areas of the monument which are underlain by bedrock similar to those containing the Red Dog deposits. (See attached map.)

Rationale:

The state recognizes that park lands, regardless of Wilderness status, are closed to new mineral entry. However, Wilderness designation would likely make it more difficult for adjacent

landowners to conduct geological investigations. Such studies could be integral to understanding the mineral potential of adjacent non-federal lands.

Recommendation:

Delete the portion(s) of the Wilderness recommendation covering possible routes of a transportation corridor from the Red Dog port facility to the Ambler mining district.

Rationale:

Maximum flexibility should be maintained for a corridor from the Red Dog port to the Ambler mining district. Technically, Title XI does provide a mechanism for developing such a corridor within Wilderness. There is no doubt, however, that a Wilderness designation would make a successful application of Title XI more difficult.

Summary Recommendation:

In light of the specific recommendations above, the numerous conflicts identified, and the lack of compelling benefit from designation of any Wilderness, the state suggests that the no action alternative may be the most appropriate in this instance. The attached map roughly outlines the potential conflict areas identified in Cape Krusenstern. It appears that the remaining areas would not be manageable or particularly valuable if placed in Wilderness status.

GENERAL EIS COMMENTS

- 1) The document does 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 EIS 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, a sister agency in the Department of Interior, includes in its Comprehensive Conservation Plans 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.) We request that the final EIS contain such an evaluation.

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 EIS.

- 2) The document does 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. [#5(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[# 6 see inserts]) 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 will be addressed **after** Congress has acted on these Wilderness recommendations. 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 EIS does 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 EIS 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 EIS clarify that some of the developments contained in the scenarios are not consistent with the adopted General Management Plan (GMP) and would, therefore, not currently receive approval from the NPS.
 - 5) The EIS does not adequately describe the relationship between the management directions established in the GMP for this unit and the Wilderness recommendations. The state requests that the final EIS discuss this relationship. In particular, the GMPs generally indicate that NPS intends to maintain options for future visitor-related development. The EIS 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 EIS identify alternative development sites; provide clear rationale for proceeding with the recommendation; or exclude the area(s) from the Wilderness recommendation.

- 6) The EIS (page 7) states 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". The state requests that the EIS 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 EIS are not adequate for finding landmarks addressed in the respective texts. The state requests that at least one map be included in each EIS showing pertinent features that are referenced in the text. Further, we strongly urge that the final documents be accompanied by more detailed inset maps showing the proposed new boundaries in greater detail.
- 8) Each EIS presents tables depicting estimated subsistence resource harvest levels. (See pages [#8 insert] The headings for these tables are inadequate for explaining their content and could be problematic if the tables are taken out of context. The EIS 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 their margin of error. 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. This is especially important since this information may be used for decision-making in other contexts.
- 9) The term "subsisters" should be deleted wherever it occurs in the EIS and replaced with "local rural residents" or similar language. Similarly, references to "commercial hunting" should also be replaced with "guided hunting" or "hunting guide camps". There is no "commercial hunting" in Alaska in the sense that wildlife cannot be sold.
- 10) 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 materials for trapping 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.

- 11) The state is uncomfortable with Wilderness recommendations immediately adjacent to state lands. To date, there has been little indication that an NPS Wilderness designation could be used to restrict development activities on adjacent state lands. However, in the long-term, there are no assurances that legal and/or political pressures will not change this situation. For this reason, the state requests that all the EIS, and any subsequent proposed legislation, contain a statement of intent that the designation of Wilderness will not affect the use and development of adjacent non-federal land.
- 12) The ANILCA Section 810 evaluations contained in the EISs are lacking in the specificity needed to facilitate an assessment of the potential effects of the proposed actions on subsistence uses. (See page-specific comments.) Our major concerns regarding the 810 evaluations are 1) contrary to what is suggested in the plans, subsistence use "patterns" are not depicted; only harvest estimates are provided and their accuracy is questionable; 2) because subsistence use patterns of the unit and adjoining areas by resident zone communities are not described, the EIS fails to sufficiently evaluate the potential effects on subsistence uses of either the proposed action or other alternatives.

The state recommends that the final EIS include a more thorough discussion of how the proposed Wilderness areas are and have been used for subsistence purposes by local rural residents and communities. This discussion should include, but not necessarily be limited to, months of harvest activities; resources harvested; modes of access for specific activities; and additional material on how harvest data were developed.

PAGE-SPECIFIC COMMENTS

Pages 9-27, Alternatives. The range of alternatives containing Wilderness recommendations in this EIS is particularly narrow. The proposed action (Alternative 2) contains 74% Wilderness. The primary difference between the proposed action and Alternatives 3 and 4 is the amount of private land included in the recommendation. At least one alternative containing less than 74% Wilderness would be more reasonable.

Page 11. The Study Area map (and other maps in the EIS) incorrectly show state-owned lagoons and tidelands to be part of the monument, even though tide and submerged lands are not federally-owned. Each map should include a footnote regarding state-ownership of these areas.

Pages 12-27, Alternatives and Development Scenarios. There is an apparent need for coordination between federal land managing agencies in Northwest Alaska regarding future access to and from the Ambler Mining District. While the Fish and Wildlife Service indicates (page 80 of the Kanuti Refuge Comprehensive Conservation Plan) that access to Ambler from the Red Dog port facility is currently favored over access from the Dalton Highway, the National Park Service is recommending Wilderness designation for land in the Krusenstern, Noatak, and Kobuk units, over which a route to Red Dog would have to cross. Given the scope of the Ambler District mineral deposits and the likelihood that they eventually will be developed, we suggest that the need for such future access be discussed.

Page 15. The EIS includes the following statement under each alternative: "State owned land along the northern boundary is a remnant tract with low development potential." This statement is incorrect and unsupportable given existing data. An attached technical memo indicates this area contains host rock similar to that surrounding the Red Dog area.

Page 17. Paragraph 2 indicates that 353 acres of state land in the northern portion of the monument are recommended for Wilderness. The map should more clearly label this parcel as state land. Further, the map shows several large lagoons recommended for Wilderness. The state asserts ownership of all tide and

submerged lands adjacent to monument land. Previously in this letter the state has urged that these areas be dropped from the Wilderness recommendation. Regardless of the NPS response to this recommendation, we request that the map and text further elaborate on the status of these lagoons.

Page 32. The top of the page contains the following statement: "Although some cabins and buildings do exist, they are mostly on private lands." The EIS should address how Wilderness designation would affect existing and future use of these cabins. Such discussion is particularly important since Alternatives 3 and 4 would encompass these cabins.

Page 33. We request that the discussion of bears be updated based on current studies. A joint NPS/DFG project adjacent to the northern boundary includes bear research. A census in 1987 resulted in a density of 1 bear per 19.4 square miles. Further information can be found in "Demography of Noatak Grizzly Bears in Relation to Human Exploitation and Mining Development" by Ballard, Roney, Larsen, and Ayres, June, 1988. Also, during recent years there have been frequent local resident reports of bears seen along the coast in the spring.

Page 34. We request that the Dall Sheep discussion be updated based on recent surveys. Doug Larsen, Kotzebue area biologist, reports that sheep populations have stabilized.

Page 41, Subsistence Uses. The first paragraph asserts that the "overall pattern of subsistence-resource use" is depicted in Table 3. As with Aniakchak, we again note that a description of subsistence patterns involves discussing far more than estimated harvest levels. The two paragraphs devoted to a discussion of subsistence do not adequately characterize the role and importance of fish and wildlife resources in area communities.

Page 42, Table 3. It is unclear what constitutes the "region" referred to in this table. We request that the technical reports used as a source of information be specifically identified. Also, sheefish should be added to the list of fish taken. This species is a significant resource in Kotzebue and Kobuk River communities.

Recent research conducted by DFG/Division of Subsistence in Kotzebue indicates that fish constituted about 40 percent of the resources harvested there in 1986. This research also found that 28 percent of the harvest was terrestrial big game and 27 percent was sea mammals. Further information on these as yet unpublished findings is available from Susan Georgette in DFG's Kotzebue office (telephone 442-3420).

Page 43, Subsistence Map. This map is incomplete and, therefore, misleading. For example, Noatak residents hunt moose, caribou, and small game all along the Noatak River. Additionally, a wide range of fishing activities occur near Kotzebue, Noatak, Sisualik, along the Cape Krusenstern coast, and on the Kelly River. Whitefish and salmon are important fish species. Brown bear, waterfowl, small game, shorebirds, eggs, and furbearers are also harvested within the monument boundaries. Sea mammal hunting areas should also be depicted. We request that the NPS refer to the following reference for more complete information on subsistence harvest areas for most of the communities of interest (excluding Kotzebue, whose subsistence harvest areas are believed to overlap those of many other area communities): Robert Schroeder, Dave Andersen, and Grant Hildreth, 1987. Subsistence Use Area Map Atlas for Ten Kotzebue Sound Communities. DFG/Division of Subsistence, Juneau, and Maniilaq Association, Kotzebue. If this map cannot be revised to portray the correct information, we request it be deleted to avoid perpetuating an incorrect picture of subsistence use areas.

Page 45. We request that paragraph 5 recognize pre-ANILCA ORV access and ORV access allowed under ANILCA Section 810. Paragraphs 5 and 6 should also recognize other trails used over the years to cross the monument for subsistence, recreation, and access to inholdings. (See attached map.)

Page 46, first sentence. The final EIS should clarify that the number of recreational visits cited refers to visits by non-local residents. Use by local residents is much higher.

Page 46, second paragraph. The DFG Division of Subsistence estimates that approximately 15 people reside in the unit during the winter months. At least three households are known to reside there year-round and several others live there intermittently.

Pages 51-52. We request clarification of the following statement: "Policy over the long term would vary on decisions about such things as road locations and mileage, landing sites, extent and location of facilities, and degree of controls applied to activities such as vehicle use, open and closed areas of use, and physical developments." "Road locations and mileage" in the monument can only be approved by Congress (Title XI). The extent and location of facilities should be consistent with the General Management Plan (GMP). "Degrees of controls on vehicle uses, open and closed areas, and related developments" are subject to Title XI regulations, public hearings, etc. The statement as written does not clarify the difference between Wilderness and non-Wilderness designation overlapping monument and preserve status.

Page 52. Throughout the EIS, archaeological resources are identified as the key element needing additional protection. For example, under the no action alternative, the EIS states "Potential for indirect threats to archaeological resources would increase in the beach ridge complex and throughout the monument." However, the Kobuk Valley EIS (page 59) says "The topic of archaeological resources was not selected for impact analysis because Wilderness designation provides for both preservation and minimum tool excavation for research. This is identical to current park management and would thus cause no change to be analyzed." The discrepancy between these two EISs illustrates the lack of clarity in these documents regarding what Wilderness management offers that is not already achievable through other NPS authorities.

Page 53, Impacts on Subsistence Use of Resources (see also corresponding discussions on pages 58, 64, and 68). We request that the harvest percentages in the first paragraph be revised consistent with our earlier comments. The second sentence in the final paragraph indicates that "only caribou and moose are taken within monument boundaries". On the contrary; brown bear, ptarmigan, waterfowl, seals, muskoxen (suspected), furbearers (wolves, arctic fox, red fox, muskrat, hare, lynx, land otter, wolverine, and possibly marten and mink), porcupine, ground squirrels, snowy owl, salmon, dolly varden, whitefish, grayling, tomcod, fish, eggs, berries and roots are also taken and should be addressed in this analysis. In nearshore waters, beluga, bearded seal, ringed seal, and spotted seal are commonly taken. Clams and crabs are picked up along the beach after big storms. NPS already has most or all of this data, and we are concerned that it is not being used or interpreted in a thorough manner. We strongly urge that this analysis be expanded. DFG staff are willing to assist in this effort, if needed.

Pages 58, 64, and 68. These pages indicate that caribou, moose, and marine mammals are the key species taken in the region for subsistence purpose. We do not dispute these statements, but we note that other resources are seasonally important (e.g., whitefish, waterfowl and berries) and should not be underestimated as contributors to the local diet.

Page 70. Although the document notes that the development scenarios are not NPS proposals, all except one of the developments described under the alternatives are NPS ranger facilities. The EIS then portrays the impacts associated with the identical ranger facilities in each of the four alternatives. This may lead the reader to the conclusion that no additional development will occur in the monument regardless of whether Wilderness designations occur or not. To further support this conclusion, the EIS states on page 70:

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Construction of other structures was not discussed because regardless of Wilderness designation only public health and safety cabins, structures necessary for park administration, and temporary structures for subsistence use are allowable and would not be affected by Wilderness designation or the lack of it.

An additional element of confusion stems from the lack of a concise statement clearly portraying the existing levels of protection accorded to the monument by Congress. The EIS presents little justification or need for designated Wilderness in Cape Krusenstern.

Page 70, last sentence. The phrase "sport hunting and trapping" incorrectly appears, by implication, to categorize "subsistence trapping" and "sport trapping." Trapping is allowed in the monument (restricted to subsistence zone residents) and is not categorized by ANILCA or state regulations.

Pages 70-71, Issues Dismissed. As noted in our comments on this document, we believe that access, cabins and airplane use are, indeed, important issues that the EIS should address. This is true in part because Wilderness could affect these activities in the long run, and in part because the public would benefit by a discussion clarifying common misconceptions.

Page 71. Under ALTERNATIVES CONSIDERED BUT REJECTED, the EIS notes "The other alternative that was rejected considered a smaller area (413,440 acres) of Wilderness that would exclude monument lands along both the southern and western coasts. This alternative was dropped because it would not provide protection to any coastal resources which contribute to the pristine character of the monument." This statement erroneously implies that monument status does not provide protection to coastal resources. Neither the draft EIS nor the preceding GMP provide documentation of damage to monument resources that would be obviated if Congress designates it as Wilderness.

On behalf of the State of Alaska, thank you for the opportunity to review this draft EIS. 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


By Sally Gibert
State OSU Coordinator

Draft Wilderness Comments
Cape Krusenstern National
Monument

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August 12, 1988

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
Mr. John Katz, Office of the Governor
Alaska Land Use Council Members
Land Use Advisors Committee Members

MEMORANDUM

TO: Sally Gibert, Division of Governmental Coordination

FROM: C.G. Mull, Geologist
Alaska Division of Geological
and Geophysical Surveys

SUBJECT: Cape Krusenstern wilderness

DATE: 5 August, 1988

In response to your request, I have examined the available geologic mapping in the area of the northern part of State owned or selected lands in northern part of Cape Krusenstern National Monument. This mapping consists of a published U.S. Geological Survey map at a scale of 1:63,360 and some old reconnaissance mapping of my own.

The mapping shows that the northern part of Cape Krusenstern National Monument is on the north flank of a regional uplift that forms much of the Mulgrave Hills and Tahinichok Mountains. Bedrock on this uplift is dominantly the Kanayut Conglomerate. On the north flank of the uplift, scattered exposures of black shale and chert indicate that the Kuna Formation is probably widespread in the lowlands of the northern part of the Monument and adjacent areas. Regional exploration in the western Brooks Range has shown that the Kuna Formation is the host rock for a number of zinc-lead-silver deposits, including the nearby Red Dog mine that is currently under development. In addition, a number of lead-zinc occurrences have been reported in the Kanayut Conglomerate in the western Brooks Range.

From the geological standpoint, an important aspect of the wilderness proposal in Cape Krusenstern National Monument as well as other units of the national conservation system, is the need for access to surface outcrops for the purpose of scientific studies. Geological data from many areas are synthesized and extrapolated in the development of regional geological concepts. Some of these concepts may be strictly of a technical and academic nature; other concepts may have bearing on exploration for economic resources in areas far removed from the area of the wilderness designation. Inclusion of many areas into the conservation system has had the effect not only of removal of potential economic resources from consideration in the national resource base, but in many cases also severely inhibits the process of exploration for resources outside the conservation units. Wilderness designation can potentially be one additional layer of regulation that inhibits scientific access to many areas of Alaska.

Attached is a generalized map that outlines the areas of bedrock exposures or bedrock thinly mantled by tundra cover in the northern part of Cape Krusenstern National Monument. Note, however, that adjacent lowland areas may also be underlain at shallow depths by bedrock similar to that of the uplands

cc: Robert Forbes, Director

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- [1304] Ms. Susan Alexander, The Wilderness Society, Anchorage
- [1266] Ms. Gail Baker, U.S. Fish & Wildlife Service, Anchorage
- [1252] Mr. Michael Barton, U.S. Forest Service, Juneau
- [1037] Ms. Joyce Beelman, Alaska Department of Environmental Conservation, Fairbanks
- [1400] Ms. Mary Bixby, Division of Governmental Coordination, Juneau
- [1490] Mr. Rex Blazer, Land Use Advisors Committee, Fairbanks
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