

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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September 30, 1988

Ms. Carol Aten
Office of Policy
National Park Service
P.O. Box 37127, MIB-MS1226
Washington, D.C. 2003-7127

Dear Ms. Aten:

The State of Alaska has received the proposed Criteria for Parklands as published in the Federal Register on August 23, 1988, and corrected on August 31, 1988. We are aware that the Criteria will be incorporated into the National Park Service Management Policies which were available for public review earlier this year. We also understand that these Management Policies are being revised to more fully reflect the provisions of the Alaska National Interest Lands Conservation Act (ANILCA).

The state is unsure of the relationship between these Criteria and ANILCA, thus hampering our ability to effectively comment on the Criteria. For example, ANILCA Section 101(d) would clearly reduce their applicability in Alaska. Section 101(d), commonly referred to as the "no more clause", states that "...disposition of the public lands in Alaska pursuant to this Act are found to represent a proper balance between the reservation of national conservation system units and those public lands necessary and appropriate for more intensive public use and disposition, and thus Congress believes that the need for future legislation designating new conservation system units, new national conservation areas, or new national recreation areas, has been obviated thereby."

As discussed in the State of Alaska's June 10, 1988, comments to your office on the original draft Management Policies, it is difficult to sort out those draft policies which are modified or superceded by ANILCA. Since these Criteria will be incorporated into the overall policy document, we reiterate our request that ANILCA provisions be interwoven into the final document. The state also urges that the revised policy document reflecting ANILCA (including the Criteria) be made available for additional public review. At its September 20, 1988 meeting, the Alaska Land Use Council, established pursuant to Section 1201 of ANILCA, unanimously passed the following motion addressing such additional public review.

September 30, 1988

The Alaska Land Use Council urges the Secretary of the Interior and the Director of the National Park Service to either hold adoption of the policy guidelines in abeyance until a specific section on Alaska national park units and ANILCA is written, subjected to the appropriate public review and comment and included in the larger document; or, amend the proposed management policies to exclude Alaska national park units from application of the policies and develop and publish subsequent or supplemental management policies exclusively for Alaska.

Public review should include, at a minimum, that previous commentors identifying the lack of Alaska-specific discussions be afforded an opportunity to review the revisions before the Management Policies are finalized. Such a review could be coordinated through the Alaska Regional Office of the National Park Service or possibly through the Alaska Land Use Council. Without the additional review, Alaskans will have no opportunity to meaningfully comment on how these Criteria and other policies apply in Alaska.

Thank you for your consideration of these concerns. If we can be of assistance in clarifying these comments, please do not hesitate to call this office.

Sincerely,

Robert L. Grogan
Director



By: Sally Gibert
State CSU Coordinator

cc: Mr. Boyd Evison, Regional Director, NPS
Commissioner Judith Brady, DNR
Commissioner Don Collinsworth, DFG
Commissioner Dennis Kelso, DEC
Commissioner Mark Hickey, DOT/PF
Mr. Rod Swope, Office of the Governor
Alaska Land Use Council Members
Land Use Advisors Committee Members