

STATE OF ALASKA

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March 4, 1994

Roger Kennedy
Director
National Park Service
1849 C Street N.W.
Washington, D.C. 20240

Dear Mr. Kennedy:

The State of Alaska is aware of efforts to evaluate the Department of the Interior and other federal agencies for the purpose of reducing costs and increasing efficiency. We recognize the value of such an exercise and offer the State of Alaska's perspective and recommendations concerning the National Park Service presence in Alaska for your consideration.

First, the State strongly supports retention of the Alaska Regional Office. While the Alaska NPS budget and visitation numbers are low compared to other regions, Alaska has by far the largest acreage in the national park system (over 65% of the nation's total parklands). **But more importantly, The Alaska National Interest Lands Conservation Act (ANILCA) mandates management prescriptions for all Alaska park units which are very different from those applicable to parks in other regions.** ANILCA's special provisions affect nearly every aspect of park management, sometimes in subtle ways. Without regional office personnel who can become specialists in understanding and implementing these distinctions, Congressional intent for Alaska will be difficult, or most likely impossible, to carry out. If key NPS policy decisions are made outside Alaska, there is no question that ANILCA will be improperly implemented.

Transferring high level policy staff out of Alaska will probably not save very much money after travel and other communication inefficiencies are factored in. It would also be more difficult for the public, State, Native corporations, and other adjacent landowners to effectively communicate and work with the NPS. The State, and this office in particular, relies heavily on day-to-day personal contacts with Alaska Regional Office policy makers. We strive to build and maintain a mutual rapport and respect that facilitates resolution of federal/state management issues. Such trust relationships are difficult to build long distance.

The State recognizes, however, that some program and staff reductions are inevitable. In this vein we support consideration of reductions or consolidation in the following areas.

Personnel and Administration: We support options under consideration to consolidate various administrative functions at the national and regional levels.

Cultural Resources: This is a large division which could probably absorb some staff reductions and still meet its basic responsibilities.

Subsistence: Subsistence staffing has expanded significantly to address NPS subsistence management responsibilities. Personnel have been added to support NPS involvement in the Federal Subsistence Board; and most parks have hired subsistence resource specialists to work with their respective Subsistence Resource Commissions and local communities. These recent expansions preclude the need for a heavily-staffed and centralized subsistence program in the regional office. In addition, we believe significant cost savings could be achieved by exploring alternatives to involvement of the Cooperative Park Studies Unit at the University of Washington in park-related subsistence and ethnographic studies. An expanded working relationship with the Division of Subsistence in the Alaska Department of Fish and Game (DFG) should be given careful consideration.

Monitoring of fish and wildlife populations: NPS monitoring efforts substantially duplicate on-going work by Alaska's DFG. Rather than conducting separate programs, it would be far more cost-effective to develop cooperative fish and wildlife monitoring programs which will meet the needs of both the State and NPS.

Beringia: We suggest that the extracurricular program to establish a proposed Beringia International Park could be substantially reduced or eliminated. Given its high costs, vague benefit to Alaska, and the political uncertainties in Russia, this project appears to be of marginal value at a time when more basic programs are threatened.

On the other hand, there are some functions that should not be reduced or moved out-of-state under any organizational scheme. These are Planning and Lands.

The State has consistently stated that planning for Alaska park units should be conducted in Alaska. Our experience with planning out of the Denver Service Center, for example, in most cases illustrates that non-local planning staff are not sufficiently familiar with ANILCA or Alaska's unique environmental, social and resource management issues to adequately address Alaskan issues. It would also be far more

cost-effective to conduct Alaska-specific planning in Alaska. In addition, Alaska's NPS Rivers and Trails Conservation Program has provided exceptional state and local government and public assistance in planning, such as for the Nenana River corridor adjacent to Denali National Park.

Similarly, the Lands Division has the specific responsibility of working with non-NPS interests and landowners. The loss of effectiveness if this function is moved or significantly reduced cannot be overstated. Given the large amount of non-federal land within Alaska NPS units, and special ANILCA provisions which require effective working relationships with affected interests and adjacent landowners, NPS cannot afford to take reductions in this area.

We also understand that NPS is considering an "ecosystem approach" to park management. While the State has consistently opposed the concept of buffer zones, especially given the vast size of Alaska's park and preserve units, we strongly support efforts to develop cooperative partnerships with other landowners. The State of Alaska owns substantial land within and adjacent to NPS units in Alaska, including tidelands and all lands beneath navigable waterways. Furthermore, the State retains management jurisdiction over fish and wildlife. The potential exists to develop mutually beneficial management programs if NPS approaches the State (and other landowners) as an equal partner.

Thank you for your consideration of these suggestions. In recent years the State of Alaska has also been grappling with reductions in government. It is a painful process, but one which we hope will lead to qualitative improvements.

Sincerely,



Paul C. Rusanowski, Ph.D.
Director

cc:

Bruce Babbitt, Secretary of the Interior
George Frampton, Assistant Secretary for Fish and Wildlife and
Parks
Molly Ross, Special Assistant, Assistant Secretary for Fish and
Wildlife and Parks
John Morehead, Regional Director, Alaska Region NPS
Senator Ted Stevens
Senator Frank Murkowski
Representative Don Young
John Katz, Governor's Office, Washington, D.C.

**CSU Distribution List
NPS Reorganization
March 8, 1994**

Tina Cunning, Department of Fish & Game, Anchorage

Terry Haynes, Department of Fish & Game, Fairbanks

Priscilla Wohl, Department of Environmental Conservation, Anchorage

Joyce Beelman, Department of Environmental Conservation, Fairbanks

Alice Iliff, Department of Natural Resources, Anchorage

Jeff Otteson, Department of Transportation/Public Facilities, Juneau

Norm Piispanen, Department of Transportation/Public Facilities, Fairbanks

Clyde Stoltzfus, Department of Transportation/Public Facilities, Juneau

Cheri Jacobus, Attorney General's Office, Anchorage

Mary Pignalberi, Tourism, Department of Commerce & Economic Development, Juneau

Gabrielle LaRoche, Department of Commerce & Economic Development, Juneau

Dick Swainbank, Department of Commerce & Economic Development, Fairbanks

Stan Leaphart, CACFA, Fairbanks

Nelson Angapak, Alaskan Federation of Natives, Anchorage