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March 18, 1994

Gary Vequist  
National Park Service  
2525 Gambell Street, Room 107  
Anchorage, Alaska 99503

Dear Mr. *Gary* Vequist:

The State of Alaska has reviewed the Resource Management Plan for the Klondike Gold Rush National Historical Park. This letter represents the consolidated comments of the State's resource agencies.

Hazardous Materials

Many historical sites within the Klondike Gold Rush National Historical Park may contain hazardous materials or oil products that were used during the gold rush period. Compliance with State and federal regulations concerning exposure to and disposal of used oil and other hazardous substances is important during any rehabilitation or restoration projects. For example, lead based paints may be encountered during the rehabilitation process for historic structures. Additionally, care should be taken to determine appropriate areas for tourists/visitors if hazardous materials are suspected. Additional data is necessary to determine the extent of hazards and the type and level of appropriate mitigation. These issues should be addressed at the outset for any research or rehabilitation projects proposed in the RMP.

Natural Resources

**INTRODUCTION, E. Park Division Overview--**"Natural Resources is responsible for the inventory, monitoring and protection of the parks natural resource base." We suggest a reference be inserted in the accompanying paragraph to clarify that the "minimal National Park Service efforts" supplement the State of Alaska's responsibilities and existing data base for fish and wildlife.

**PRESENT RESOURCE STATUS, D. Natural Resources, Wildlife**--The only reference to the Alaska Department of Fish and Game (DFG) in this section relates hunting information on mountain goats and black bear. DFG manages all of the populations described; such management is not limited to the harvest aspects of populations. To correct this deficiency, we suggest insertion of the language from the Yukon-Charley National Preserve Resource Management Plan explaining the State's management authorities and relationships to the National Park Service's role. For the benefit of readers and park employees, this language would clarify appropriate roles and explain why the Service has not prioritized data collection.

We also suggest this section be retitled "Fisheries and Wildlife". We expressed concerns in the State's August 1993 review of the Draft General Management Plan about the failure to fully recognize the extent and role of fish resources in the park's vicinity (State letter attached). We similarly note that the RMP understates the extent and role of fish resources. We urge this section be expanded to include the following information:

There are fish resources in the streams that enter Taiya Inlet within the park. The Taiya River has fall chums, and West Creek, a tributary to Taiya, has Dolly Varden and coho salmon. Local residents enjoy fishing for Dolly Varden at the mouth of the Taiya. These West Creek-Taiya stocks are relatively important to the area, and seasonal sport fishing at the mouth of the Taiya River and along some of the nearby shoreline is important to residents and some visitors. Additional information may be available from the DFG Sport Fisheries Division in Juneau (contact Mark Schwan at 465-6185).

**IV. NATURAL RESOURCES MANAGEMENT PROGRAM, A. Overview of Current Program and Needs, Natural Resources, Needs**. In light of the park's relatively small size and the responsibilities of the State of Alaska for management of fish and wildlife, the natural resource information needs are primarily terrestrial flora and small animals such as invertebrates. This section does not seem to adequately define research needs that would justify a full time "Resource Management Specialist" in addition to the identified manpower and funding requirements of the individual studies.

The individual projects "KLGO-N-001.000", "KLGO-N-001.020", and "KLGO-N-001.030" appear to have considerable overlap for inventory of flora and fauna in the park. We suggest these proposed inventory projects be combined or the distinctions be made clearer. We also note the continued failure to recognize fishery resources.

Project "KLGO-N-009.000 **FIRE MANAGEMENT PLAN**" should reference the statewide program for interagency fire management plans, for which the proposed park plan would supplement and be consistent.

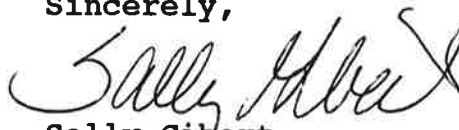
Project "KLGO-N-013.000 **BEAR MANAGEMENT PLAN**" should include "in cooperation with the Alaska Department of Fish and Game" in the recommended action to "prepare a bear management plan" since DFG has primary responsibility for monitoring and maintenance of bear populations as part of its management.

Water Rights

If this plan does not directly change or make recommendations concerning public use, it is not necessary to include the State's guidelines for management of the beds of navigable waterbodies. The plan should, however, acknowledge the role of the State regarding water rights. To do this, we request inclusion of the attached language concerning water rights.

Thank you for the opportunity to review this document. If you have any questions, please feel free to contact me at 561-6131.

Sincerely,



Sally Gibert  
State CSU Coordinator

cc:

Clay Alderson, Superintendent, Klondike Gold Rush NP  
Harry Noah, Commissioner, Department of Natural Resources  
Carl Rosier, Commissioner, Department of Fish and Game  
John Sandor, Commissioner, Department of Environmental  
Conservation  
Bruce Campbell, Commissioner, Department of Transportation and  
Public Facilities  
Richard Burton, Commissioner, Department of Public Safety  
John Katz, Governor's Office, Washington, D.C.

Water Rights

*Please include the following language in the RMP:*

Federal reserved water rights are created when federal lands are withdrawn from entry for federal use. They are created for the minimum amount of water reasonably necessary to satisfy both existing and reasonably foreseeable future uses of water for the primary purposes for which the land is withdrawn. The priority date is the date the land is withdrawn for those primary purposes.

Federal reserved water rights in Alaska can be claimed and adjudicated in basin-wide adjudications in conformance with the McCarran Amendment under state law, AS 46.15.165-169 and 11 AAC 93.400-440, either administratively or judicially. Alternatively, federal water rights may be applied for and granted under state law for either out-of-stream or instream water rights. In any case, water claimed or requested must be quantified.

The Service will work cooperatively with the State of Alaska to inventory and quantify its federal water rights under state law. Water resources of the Klondike Gold Rush National Historical Park will be managed to maintain the primary purposes for which the unit was established.

In addition to federal reserve water rights, the plan should note that a federal agency can apply for water rights through the existing state water rights system. Use of the State's application system will, in many cases, provide the Service with the senior water rights and save both the State and federal government the cost of a federal reserve water right adjudication. The issuance of state water rights will not preclude the Service from applying for its federal reserve water rights in the future if the need arises. The Alaska Water Use Act also allows public agencies to apply for reservations of water for instream uses including fisheries, recreation, and water quality purposes.