

# STATE OF ALASKA

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June 17, 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 final draft of the Resource Management Plan for the Yukon-Charley Rivers National Preserve. This letter represents the consolidated comments of the State's resource agencies.

The State appreciates the additional opportunity to review the final Yukon-Charley Rivers Resource Management Plan (RMP). Much sensitivity to the State's and public's interests is reflected throughout the document. If the other park units adopted the document as an RMP template and made changes only as necessary to fit the particular unit's differences, duplicative issues would be greatly reduced during our reviews.

The project statements for N19 and N20 (Section III, Page A-4) have been significantly rewritten since the last time we reviewed this document. The earlier language was the product of considerable discussion and rewrites between the State and the NPS and was better than this version. As had previously been acknowledged and corrected by the NPS, this statement once again emphasizes the specifics of harvest information. Consequently, it inappropriately deflects attention from the real issue of the necessity to collect population information. We request the earlier language be adopted. If the old language is somehow problematic, we request a brief opportunity to discuss the present proposed language (Tina Cuning, 349-5671).

There are a few references to trails, airstrips, and roads which cause some concern about whether the resources staff adequately recognize the nature and extent of protection of the public's use of such access under ANILCA. For example, N-023.0, Page 1 states "Access routes such as the Buhlenberg Winter Trail, damaged by

unauthorized movement . . .". In other places, project descriptions appropriately discuss intent to reroute parts of trails to reduce erosion but provide for the continued traditional (pre-ANILCA) access. We are not asking for any specific language changes but without checking line-for-line against the original "final" plan, the impression is left that recognition of access rights and the necessity to complete the access plan required in ANILCA 1301 have been dropped from this version. Perhaps this could be addressed by a statement in the introductory part of the plan.

Project Statement YUCH-C-007.0: Prepare Ethnographic Overview and Assessment. We recommend the NPS not restrict the focus of this assessment only to the Han Athabaskans. Their traditions should be documented more completely, but to imply that "rising numbers of Caucasian residents" have been a disruptive force to Han culture is misleading. Non-Native people have been a significant presence in the region for nearly a century and are part of its socioeconomic and cultural fabric. To allocate \$105,000 for this project and not have it address all residents in the area would be inappropriate.

We are also concerned about the timing and need for such a project in view of the subsistence use study currently in progress. Presumably some of the data requirements of this proposed study are being addressed in the subsistence study.

In view of the difficulties experienced by the NPS and the Cooperative Park Studies Unit in carrying out the subsistence study still in progress, the NPS should seriously consider contracting with an Alaska-based organization to conduct the ethnographic overview and assessment. NPS oversight is appropriate, but the data collection probably can be done more efficiently by other entities.

Project Statement YUCH-S-001.0, Determine Historic and Contemporary Subsistence Resource Use Patterns. The RMP should clarify the extent to which the objectives of this proposed study are addressed in the subsistence project currently being conducted in the preserve area communities of Eagle, Circle, and Central. The State's Division of Subsistence appreciates the role proposed for one of their subsistence resource specialists.

Section I, Pages 4 and 5: The State appreciates the RMP's acknowledgement at the bottom of page 5 that sport hunting and furbearer trapping are allowed in the preserve, in addition to traditional subsistence uses. We also note that NPS regulations at 36 CFR 13.41 specify that subsistence uses by local rural residents are allowed in the preserve. The page 5 language, however, appears to differ from that on page 4 (last dot) which refers to rural Alaska residents with a personal or family history of subsistence use as being eligible. The page 4

reference appears to set more restrictive eligibility requirements for subsistence use in the preserve, and therefore should be corrected to more closely reflect the statute and regulations.

Section II, Page B-1: The first paragraph on this page should be corrected to reflect that the tour boat operation cited has since gone into bankruptcy.

Section III, Page A-3, second paragraph: The correct title of the first legislation is the "National Environmental Policy Act".

N-011.0, Page 1, second paragraph: The RMP should clarify whether the acreage cited for state lands includes navigable waterways, and if so, which ones.

N-018.0, Page 1, second paragraph: The scope of this document does not include making recommendations regarding airshed classifications. To properly reflect the role of the RMP regarding this issue, we suggest rephrasing the beginning of the second sentence as follows: "The area should be assessed for recommendations concerning a Class I designation to provide..."

N-031.0, Page 1, paragraph 5: The RMP should reflect that the Kandik and Nation rivers, at their headwaters, have recently been recognized as navigable by the IBLA, which assures that they are navigable as they pass through the preserve. The paragraph should also recognize that there may be other waterways which are determined to be navigable in the future.

Appendix J: Bibliography of References Cited. This bibliography is incomplete. References for at least the following authors cited in the text are missing: Andrews 1986; Bacon 1986; Crow and Obley 1981; Dixon 1985; Haynes 1977; Hopkins 1979; Janes 1975; McKennan 1969; Pahlke 1985; Vinson, Simeone 1982; Simms 1992; Worthington and Brown 1992;. The document is of limited use as a technical resource without a complete bibliography.

Section VI, Page J-6: The citation for Caulfield 1983 incorrectly lists as a Cooperative Park Studies Unit document a report in the Alaska Department of Fish and Game, Division of Subsistence, Technical Paper Series.

Due to the exceedingly short time frame given for our review during the height of field season activities for wildlife staff, a few of the new or expanded project statements were not able to be reviewed by appropriate staff. Specifically, we may provide additional comments on Project Statement and description YUCH-N-014.1 (N-014.1, Pages 1-4) and YUCH-N-014.2 (N-014.2, Pages 1-3) before the final plan goes to print.

The Statement for Management for the preserve was adopted without full public review and participation as required of the general management plan. Therefore, we continue to object to its use as a planning guideline for this or any other park unit. We note with interest that the plan indicates that the Statement for Management has been revised since its initial adoption (Section IV, Page A-3) but apparently neither the State (nor the public?) were provided opportunities for review and participation.

In conclusion, we commend the NPS for retaining nearly all aspects of the RMP that were successfully and cooperatively developed several years ago. We again suggest that this document be used as a template for RMPs in all other park units.

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

Sincerely,



Sally Gibert  
State CSU Coordinator

cc:

Paul Guraedy, Superintendent, Yukon-Charley Rivers NPr  
John Morehead, Regional Director, NPS  
Harry Noah, Commissioner, Department of Natural Resources  
Carl Rosier, Commissioner, Department of Fish and Game  
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Bruce Campbell, Commissioner, Department of Transportation and  
Public Facilities  
Richard Burton, Commissioner, Department of Public Safety  
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