

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET DIVISION OF GOVERNMENTAL COORDINATION

SOUTHCENTRAL REGIONAL OFFICE
3601 "C" STREET, SUITE 370
ANCHORAGE, ALASKA 99503-5930
PH: (907) 269-7470/FAX: (907) 561-6134

CENTRAL OFFICE
P.O. BOX 110030
JUNEAU, ALASKA 99811-0030
PH: (907) 465-3562/FAX: (907) 465-3075

PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
PH: (907) 271-4317/FAX: (907) 272-0690

July 16, 1998

Steve Martin
Superintendent, Denali National Park and Preserve
P.O. Box 9
Denali Park, AK 99755

Dear Mr.  Martin:

The State of Alaska has reviewed the draft of the Resource Management Plan for Denali National Park and Preserve. The letter represents consolidated informal comments of the state's resource agencies. We appreciate the opportunity to review this public review document.

The public draft version shows significant changes and improvements from the draft components we reviewed previously. Most of the comments from our April 13, 1998 review letter have been incorporated or addressed in the public draft version. The general tone conveys a more cooperative attitude towards achieving the objectives outlined in the plan, and with a greater sense of prioritization. In addition, emphasis on *management* of the fish and wildlife has been appropriately shifted to *protection and monitoring* by the Service with more coordination of potential management decisions with the Alaska Department of Fish and Game (DFG). We also note that substantial improvement has been made to the sections relevant to implementation of the South Denali Development Concept Plan. We commend those Park Service staff involved in this effort.

Before finalizing this document, we again recommend that for each project that would benefit from coordination with relevant state agencies, specific reference should be made to such consultation and coordination. We recognize this will lead to additional redundancy in the overall document, but since the individual project descriptions are designed to be used separately we believe this step is warranted. For future RMP efforts, we also recommend that copies be made available more widely, and that the public have a longer time period for review.

The following comments are focused on those issues that have not been addressed and areas that still need clarification:

PART ONE: INTRODUCTION

ANILCA legislative history. Concerning areas of the text where ANILCA legislative history excerpts are used, we have been contacted by Service staff and plan to meet to discuss valid and invalid legislative intent regarding ANILCA. We look forward to this opportunity and hope to provide an educational setting not only for Service staff but also for the State's newer staff who require a more thorough background of the complexities regarding ANILCA legislative history.

Page 24, paragraph 5. Wilderness designation and recommendation. This section states that traditional activities allowed by ANILCA "including access and taking of wildlife are not considered issues in the designated wilderness at Denali because they were not traditional." This statement leads the reader to believe that such activities are not currently authorized in designated wilderness, which is not true. In addition, the statement sets a negative tone for traditional uses early in the plan. We believe our April 20~~th~~, 1998 comments regarding designated wilderness provide a succinct explanation of this issue.

Page 34, 1st full paragraph (Also page N-367-3, 4th paragraph and several other places; and Page N-368): Refer to our comments on page 7 of the 4/20/98 letter for Page 27, Subsistence Context and Themes, Problem Statement N-368. We continue to request that NPS refrain from the use of the term "subsistence trapping" for the reasons stated in our previous comments.

Page 62, 2nd full paragraph, and bibliographic entry on page 72. "Karl 1983" should be "Kari 1983."

PART TWO: PRESENT RESOURCE STATUS

Page 41, Water Resource Inventory. We request modifying the first sentence to read:
"Although Denali Park's surface and subsurface water systems are immense, an existing inventory of water resources in the park is limited in scope and extent. Quantifiable data regarding seasonal water quality and quantity relationships are also limited."

Page 63, Resources Harvested, paragraph 3. While DFG has species harvest data by Game Management Units and subunits, more specific harvest data for a particular geographic area such as Denali National Park and Preserve are available through Uniform Code Units. Species harvest data by Uniform Code Units can be provided upon request through the Division of Wildlife Conservation.

PART FOUR: PARK RESOURCES PROGRAM

River Recreation, Project Statement I-630. The state manages navigable waterways and all associated commercial services. NPS manages use of the uplands. We recognize that NPS claims ownership of rivers inside the old park boundaries; however there is no dispute over state ownership and management authority in the ANILCA additions. It is important that this document recognize state jurisdiction. The first full paragraph on page 3 begins with, "Commercial boating operators utilizing the Nenana and Tokositna River are not required to receive authorization from the National Park Service, provided they do not launch, stop or land on park lands during the float trips." We request this paragraph be revised to include not only the two rivers mentioned above, but all state-owned navigable water bodies. Reference should also be made to the boundary between state and federal land at the ordinary high water mark.

Winter Recreation, Recommended Action I-640.051: Snow Machine Regulations. We request the following addition to this sentence: "...consistent with the process defined in Section 1110(a) of ANILCA." Ideally we would like to see this process spelled out:

"the Secretary shall permit, on conservation system units . . . the use of snowmachines (during periods of adequate snow cover, or frozen river conditions in the case of wild and scenic rivers), motorboats, airplanes, and nonmotorized surface transportation methods for traditional activities (where such activities are permitted by this Act or other law) and for travel to and from villages and homesites. Such use shall be subject to reasonable regulations by the Secretary . . . and shall not be prohibited unless, after notice and hearing in the vicinity of the affected unit or area, the Secretary finds that such use would be detrimental to the resource values of the unit or area."

Water Resources Management, N-210. In this entire section there is a consistent need to check where it is appropriate to include "subsurface waters" in addition to surface water when reference is made to surface water systems.

We request the following be inserted in the introductory "Statement of Problem".

Water quantity concerns relate to modification of instream flows that impact aquatic and riparian resources and habitat, navigation, water quality, and recreation/aesthetics. Expansion of coal operations in the area adjacent to the park are an example. Towards this type of concern, it should be noted the Alaska Department of Fish and Game has an instream flow application on file to provide instream flow protection for a portion of the Nenana River.

N-210, Page 3, Recreation. It should be qualified that, "at present" most of the park's water resources receive little, if any, recreational uses. (This may not be the case in the future). Also it should be noted that the glacial source of waters often can dramatically change stream crossing conditions within a 24 hour period.

N- 210, Page 9, Research . We did not note any reference to plans for quantifying instream flow requirements that can be protected for fisheries, wildlife, navigation, recreation/aesthetics, and water quality under state law or Federal Reserved Water Rights or both. A section on this is needed.

Waterfowl, Recommended Action N-361.322: Restrict Activity Around Waterfowl Nesting Areas. This seems unwarranted as well as difficult and expensive to enforce. There are waterfowl nesting around water bodies throughout the state. In addition, any restriction of activity (which we assume would be seasonal) around waterfowl nesting areas occurring on state submerged lands within the park would be dependent on action by appropriate state agencies.

Raptors, Recommended Action N-361.422: Restrict Activity Around Raptor Nest Sites. We request the word "seasonal" be inserted in the first sentence of the statement. In addition, the approximate radius of the closed area could be mentioned. (i.e., no closer than x miles, yards, or feet)

Raptors, Recommended Action N-361.434: Continue Peregrine Falcon Monitoring. We believe that only one visit per year will result in poor data. We also suggest a more thorough literature review in future project statements involving raptors.

Wolves, Project Statement N-364.1. The last sentence of the first paragraph on page 3 states: "The level of harvest that can be allowed without impacting the natural and healthy status of the wolf populations is not known." We suggest that there exists enough data to support the assumption that wolf packs can and do provide for sustained yield and, although prey population and competition from other wolves and bears influence the level, harvest may reach 40% annually. If the NPS statement is intended to imply that social structure is impacted, it should specifically state that this is the concern and cite the appropriate literature.

Wolves, Recommended Action N-364.141: Provide Public Information about Wolves. To ensure dissemination of scientifically based information to the public, we request that any educational information on wolves be cooperatively written by state and park biologists.

Page N-367-9, Table 9. "Sport" should be deleted from the table heading. State regulations apply to resident and non-resident hunters. Not all state resident hunters are "sport" hunters.

Comments related to the South Denali Development Concept Plan (DCP):

We recommend a general search of the document for "south slope," "south side," and South Denali, since these terms are used interchangeably and inconsistently. Final document should be consistent or specifically clarified in instances where variation is necessary (example: P. I-620-12 and I-620.023--unclear which south side).

In general, it is important for the RMP to reinforce that any studies, not just soils, involving the southern part of the Park/Preserve should be coordinated with other studies and subregions with the DCP.

It also appears that various parts of the plan reflect a general misunderstanding of the purpose of the South Side DCP in relation to access to the national park/preserve. Perhaps this is a result of various writers who may not be aware of the goals of the DCP. See specific examples included below.

Page 51-52, Access: This section emphasizes "threats" to the ecosystem, and implies that access is a bad thing; in reality, the National Park Service, the State, and other partners, as identified in the DCP are developing this access on the South Side. This section is in direct conflict with the DCP, and should be reworded to reflect that carefully planned access is not the "threat" the writer of this section expects. The DCP goals should be mentioned.

Page I-100-10, Communications and Partnerships: This section should include the implementation partnership involved in the South Denali DCP.

Page I-410-3, Collaborative Efforts: include the DPC implementation partnership in this section.

Page I-500-2, paragraph 5: Second sentence says increased use is expected because of plan implementation. This is not the reality, since use is and has been increasing regardless of a plan. The section should note that use has been increasing.

Page I-610-3, paragraph 3: Third sentence says the trails "could" result in increased use, possibly implying this is bad. In reality, a purpose of the DCP "is" to provide increased access, and views this as a good thing.

Page I-620-6, New Access Points: Second sentence, delete "major." Just because they are proposed does not mean they will be major. This misleads the reader. Clarify that little resource exists, but DCP implementation already has a framework for coordinated resource studies and actually is collecting data at this time. Otherwise, the implication is that there will be major development without resource data, which certainly is not the case.

Thanks for the opportunity to provide these comments. If you have any questions or need more specific information, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Gibert". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Sally Gibert
State CSU Coordinator

cc: John Katz, Governor's Office, Washington, D.C.
Marilyn Heiman, Governor's Office, Juneau
Diane Mayer, Director, Division of Governmental Coordination
John Shively, Commissioner, Department of Natural Resources
Frank Rue, Commissioner, Department of Fish and Game
Joseph Perkins, Commissioner, Dept of Transportation and Public Facilities