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August 25, 1998

Mr. Gary Gauthier, Superintendent
Sitka National Historical Park
P.O. Box 738
Sitka, AK 99835

RE: Draft GMP/EIS, Sitka National Historical Park

Dear Mr. Gauthier:

The State of Alaska appreciates the opportunity to comment on the Draft General Management Plan / Environmental Impact Statement for Sitka National Historical Park. The following represent the consolidated general and page-specific comments of the state resource agencies.

General Comments:

1. The GMP clearly and correctly states that the National Park Service (NPS) has leased the adjacent tidelands from the City and Borough of Sitka and the State of Alaska. We suggest that the document further clarify that while the NPS has the authority to regulate use on these leased tidelands, the water above the leased tidelands is navigable and the lease does not grant NPS the authority to regulate these waters. The State retains authority to regulate activities such as motorized or non-motorized transportation, recreation, and resource use occurring in these navigable waters.
2. We suggest the GMP include, as an Appendix, the Master Memorandum of Understanding between the Alaska Department of Fish and Game and the National Park Service. This document contains the general policy guidelines within which the two agencies agree to operate.

3. This fall the Alaska Department of Transportation and Public Facilities (DOT/PF) will be evaluating future improvements to each section of Sawmill Creek Road, including that section which abuts the northeast boundary of the park (see also page specific comments below). If funding is included in the Statewide Transportation Plan, construction could occur sometime after the year 2000.
4. Depending on which alternative is selected and which projects are subsequently implemented, it may be necessary for the NPS to comply with the requirements of the Alaska Coastal Management Program (ACMP) per the Coastal Zone Management Act. We suggest you add a brief discussion regarding the ACMP in the Compliance with Laws and Regulations section of the GMP.
5. Of the four alternatives presented, Alternative 1 appears to best balance the goals of offering a high-quality experience for visitors while protecting and preserving the cultural and natural resources of the park. A number of excellent ideas are presented in Alternative 1, including:
 - a) The concept of funding additional archaeological studies in the park would help yield more historical and cultural information about this area.
 - b) Providing information and orientation to visitors off-site, outside of park boundaries, would help guide visitors to major points of interest throughout the city and park.
 - c) Continued partnerships with private groups and public agencies in Sitka will continue to enhance the overall mission of Sitka NHP. The State is interested in the concept of the Division of Parks & Outdoor Recreation and National Park Service sharing staff and programs in Sitka. Both the state and federal governments have similar missions pertaining to providing opportunities for the public to learn about historical and cultural resources in the Sitka area. The State would like to consider options and opportunities for the agencies to work together in the future and suggest that possibilities for cooperative partnerships be explored.
 - d) Building 29, one of the four remaining Russian time period buildings in North America, may be a worthy addition to the national park system under a willing-seller arrangement. Turning this building into an interagency informational center is also worth consideration.
 - e) Renovating the park visitor center, priests' quarters, and old school will help enhance the visitor experience. The public would benefit from this project.

Page Specific Comments:

Page iv, paragraph 2 – The document here states that Alternative 2 "would lead to continued negative effects on visual resources and land use from adjacent land uses." We suggest that these effects be more adequately discussed in the Environmental Consequences section for Alternative 2.

Page 16, Carrying Capacity – This section discusses the potential for future revisions to the carrying capacities established by this GMP. We ask that any changes to carrying capacities be developed in cooperation with the appropriate state agencies through the Division of Governmental Coordination.

Page 29, Tidal Zone – As per our general comments, we suggest that the GMP more clearly delineate that NPS has the authority to manage the leased tidelands while the navigable waters above these tidelands are managed by the State. Also, the document suggests that motorized uses such as jet skis would be inappropriate in the tidal zone. The jurisdiction for such a closure rests with the State. The State is willing to work with the NPS on considering whether such closures might be appropriate.

Page 35, Natural Resource Management – The GMP here states that natural resources would be managed per the 1994 Resource Management Plan for the park. In our comments regarding the draft RMP (see letter from Sally Gibert to Gary Vequist dated March 26, 1993), we suggested some modifications to language contained in the draft RMP project statement SITK-N-105 (Inventory Bird and Mammal Populations). We again ask that if NPS desires to seek funding to inventory and monitor species outside the park, such studies should be described as possible cooperative efforts with the appropriate state, federal, and local agencies.

Page 37, Visitor Experience, Russian Bishop's House Unit – DOT/PF Southeast Region completed the Sitka Vehicular and Pedestrian Studies in October 1997. This study recommends that Monastery Street between Oja Way and Lincoln Street be made one-way, and a sidewalk five feet wide be constructed within the right-of-way. Excerpts of this Study have already been forwarded to you directly from DOT/PF.

Page 45, Land Protection – The GMP states that the NPS would seek 100-year extensions to the tideland leases. The maximum term for state leases is 55 years.

Page 46, Land Protection – Acquisition of the narrow strip of land between the park boundary and Sawmill Creek Road is discussed. This proposal is also depicted on most maps in the document. Our records indicate that the state right-of-way for Sawmill Creek Road, which is at least 50 feet wide from the roadway centerline, extends to the existing boundary of the park and includes the "City Bicycle Trail" shown on the maps.

Please revise the document to show that the proposed acquisition would extend only to the edge of the state right-of-way. Also note that this "City Bicycle Trail" is actually owned and maintained by the state. Please refer to this on all maps as a "Separated Path" or "Multi-Use Path".

Page 73 – Alternative 4, Visitor Experience – Construction of a new hardened pedestrian/bicycle trail along the northwest park boundary (shown on the map on page 69) appears to improve circulation of bicyclists and pedestrians in Sitka and should be considered for addition to Alternative 1. The local community is in the best position to evaluate whether this trail is needed, and we encourage you to work with local government in considering this project. If included in the final GMP, this proposed trail could be considered for funding as part of the Trails and Recreational Access for Alaska (TRAAK) program administered by DOT/PF. It may be beneficial to combine construction of this trail with improvements to the existing separated path. Selection of this project for funding would depend on review by the DOT/PF Project Evaluation Board; however, this proposal has characteristics that are likely to result in a favorable review.

Pages 101-102, Water Resources –

a) The state has previously suggested specific language pertaining to federal reserved water rights (see letter from Sally Gibert to Gary Vequist dated March 26, 1993, regarding the draft Resource Management Plan). We feel the language we have suggested gives more accurate and comprehensive background information regarding the reserved water rights process relating specifically to the Indian River. Therefore, we recommend that this language be incorporated in the Water Resources section of the GMP.

b) The discussion of the history of water allocation for Indian River should be expanded to clarify that there are three processes to establish Federal Reserved Water Rights under state law as required by the McCarren Amendment. It should also be stated that the NPS has an alternative opportunity to acquire water rights (instream and out-of-stream) independently of the Federal Reserved Water Rights process, through the Alaska Water Use Act (Alaska Statute 46.15).

c) In regards to the NPS application for a declaration of appropriation to establish a federal reserved water right to instream flows on the Indian River, the statement that "[t]o date, the state has not recognized the claim or the right", is an over-simplification of this issue. The state has made, and continues to make, efforts to reach a basin-wide settlement of Indian River water rights. The various claimants are still attempting to work together to seek resolution, as noted in the document, and have agreed to cooperate in reestablishing a stream gage and to review data for completing the adjudication process. We ask that you delete this sentence.

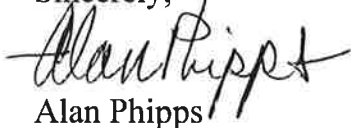
d) We recommend that opportunities be explored to seek funding and develop long-term programs to monitor and protect the health of the Indian River ecosystem in

cooperation with Sheldon Jackson College, City and Borough of Sitka, the Alaska Department of Fish and Game, and other state and federal agencies.

Page 130, Natural Resources – As noted previously, the maximum term for state leases is 55 years. Also, per our general comments, we suggest that the document more clearly delineate the different management authorities in relation to the tidelands (NPS) and the tidal zone waters (State).

Thank you for your consideration of our comments. If you have any questions or comments, or need additional information, please do not hesitate to contact me.

Sincerely,



Alan Phipps
Project Review Coordinator

cc: John Katz, Governor's Office, Washington D.C.
Marilyn Heiman, Governor's Office, Juneau
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