

# STATE OF ALASKA

TONY KNOWLES, GOVERNOR

## OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET  
DIVISION OF GOVERNMENTAL COORDINATION

SOUTH CENTRAL REGIONAL OFFICE  
550 W. 7TH AVENUE, SUITE 1660  
ANCHORAGE, ALASKA 99501  
PH: (907) 269-3980/FAX: (907) 269-3981

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

November 29, 1999

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

Dear Mr. Martin:

In response to the Fall, 1999 edition of the *Denali Dispatch*, this letter contains scoping comments related to the upcoming Denali National Park and Preserve Backcountry Management Plan Revision. These comments represent the consolidated views of the state resource agencies. In addition to the topics identified in the newsletter, we offer the following issues to be addressed in the plan revision. Generally, state agencies encourage opportunities for a range of winter recreation activities.

1) Coordination with state agencies such as the Alaska Department of Fish and Game (ADF&G) and the Alaska Department of Natural Resources in the development of the plan will benefit the process and is consistent with ANILCA Section 1301(d). By initiating such coordination through this office, you will be assured that all interested participants will be appropriately involved. Note that the agency coordination component at the bottom of 5 of the *Dispatch* should be broadened to include "land **and resource** management agencies" to reflect ADF&G's responsibilities for fish and wildlife management in the ANILCA additions. Any activities affecting public use of the state's navigable waters within the exterior boundaries of the park must be addressed in cooperation with the state.

2) Existing opportunities for subsistence access and uses of the park additions and park preserve must be retained, as provided for in ANILCA. We are concerned that given Denali's wilderness values, international prominence, and increasing levels of visitation, subsistence will be given secondary consideration to other uses.

3) State agencies desire opportunities to participate in the implementation of the Visitor Experience and Resource Protection process (VERP). We understand this visitor planning process, used in Arches National Park in Utah, will be used in Denali to revise the backcountry management plan. On the short term, we are interested in the tentative schedule for this process and how and when the interdisciplinary team will coordinate with appropriate state agency staff to gather information and other input. In future publications, it would be helpful if interdisciplinary team members are identified with contact information for inquiries.

At this early stage of the planning process, it seems premature to assume allocation or zoning of the numerous listed uses prior to analyzing and mapping resources and the range of potential visitor experience opportunities. If this step is already completed, we request the opportunity to review the map layers and provide substantive comments. Since defining desired social and resource conditions is the foundation for the VERP process, it would seem that the public should not just have the opportunity to comment on various portions of the planning process, but should be an integral part of developing the plan. Zoning may indeed have value for selected uses, and should be addressed as a viable management tool, but the application of this tool should come out of the VERP process with full public involvement.

4) South side backcountry assessment. The wilderness management project statement of the final Denali Resource Management Plan recommends the development and implementation of a backcountry permit system to "deal with apparent increasing use on the south side". While we acknowledge that use is increasing, additional information is needed to determine if, when, and how a backcountry permit system may be needed. We caution against assumptions this early in the process. Consistent with the comment above, actual implementation of this management tool should be preceded by research and documentation of uses and their impacts.

Thank you for the opportunity to submit these comments. We look forward to working with you in the development of this Backcountry Management Plan.

Sincerely,



Sally Gibert  
State CSU Coordinator

cc: Pat Galvin, Director, Division of Governmental Coordination  
John Shively, Commissioner, Department of Natural Resources  
Frank Rue, Commissioner, Department of Fish and Game

bcc: Tina Cunning, DFG-Anch  
Terry Haynes, DFG-Fbx  
Patty Bielawski, DNR-Anch  
Jim Stratton, DNR-Parks  
Norm Piispanen, DOT/PF-Fbx  
Elizabeth Barry, AG's-Anch  
Ginny Fay, DCED-Tourism  
Anna Kerttula, Gov's Office-WDC