

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SARAH PALIN, Governor

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Elwood Lynn, Acting Superintendent
Denali National Park and Preserve
P.O. Box 9
Denali Park, AK 99755

Dear Mr. Lynn:

The State of Alaska reviewed the Environmental Assessment (EA) for the Construction of Two Replacement Subsistence Use Trapline Cabins on the Herron River and on Live Trap Lake in Denali National Park and Preserve. The following comments represent the consolidated views of the State's resource agencies.

The State supports the proposal to replace two cabins that support trapping activities and appreciates the thorough discussion in the EA of trapping by subsistence users in the Lake Minchumina area and the various Alaska National Interest Lands Conservation Act (ANILCA) provisions and accompanying regulations that allow for the continuance of this established use in a reasonable and safe manner. Although we do not expect the outcome of the EA to be affected by the following comments, they are included for consideration with this proposed action as well as for future reference if the Service addresses these issues again.

Trapping by Subsistence Users

There are several references to "subsistence trapping" as well as other references that tend to distinguish trapping as a subsistence activity from trapping for other purposes. While the Alaska Board of Game has found that, for purposes of state trapping regulation, all resident uses of furbearers are customary and traditional uses, ANILCA does not categorize trapping in Alaska as being a recreation, subsistence or commercial activity. Trapping is simply a public use of wildlife. This is illustrated in the following excerpt from ANILCA Section 1313:

"A National Preserve in Alaska shall be administered and managed as a unit of the National Park System in the same manner as a national park except as otherwise provided in this Act and except that the taking of fish and wildlife for sport purposes and subsistence uses, and trapping...."

Trapping cabins are also not limited to subsistence use; and conversely, subsistence cabins are not limited to trapping uses. However, given the acknowledgement on page 22 that “*The cabins would be established as shared use cabins, and other subsistence users could theoretically benefit from use of the cabin in other ways, but no other subsistence trappers or subsistence activities are known to presently occur in the area...*,” it does not appear the Service intends to limit use of the cabins to trapping and that use of the cabin for other subsistence related purposes would be appropriate should they occur in the area.

Page-Specific Comments

Page 18, first paragraph, second sentence: Although we recognize the term “*sport*” hunting is used in ANILCA, it has developed a negative connotation over time, especially in rural Alaska, and is no longer used in Alaska Department of Fish and Game regulations. We request that “*sport*” be removed from all references to general hunting.

Page 20, Alternative 1 Cumulative Impacts; and Page 23, Alternative 2 Cumulative Impacts: The following sentence is included in both Alternatives’ cumulative impacts discussions: “*Continued harvest of furbearers would depress the populations of marten and perhaps wolves along some traplines during those years when those traplines are used.*” While there may be short term impacts to wildlife populations on a seasonal basis, it is unlikely there would be any long term reductions in area furbearer abundance as a result of the use of these traplines. The term “depress” is more appropriate to a discussion of long term impacts and we recommend it be used only in that context unless otherwise clarified.

Page 28, Subsistence Uses and Needs evaluation, last paragraph, last sentence: Fish and wildlife in Alaska, including those populations in parks and preserves, are managed by the State unless superseded by federal subsistence regulations. We are not aware that such a determination has been made for furbearers in this area.

Thank you for this opportunity to comment. Please contact me if you have any questions.

Sincerely,



Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator