

# STATE OF ALASKA

## ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

**SARAH PALIN, Governor**

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July 21, 2009

Lee Dickinson  
NPS Special Park Program Manager  
National Park Service  
1849 C St., NW.  
Washington, DC 20240

Dear Mr. Dickinson:

The State of Alaska reviewed the Policy on Special Park Uses, Draft Directors Order 53. The following comments represent the consolidated views of the State's resource agencies.

We appreciate the inclusion of the *Special Considerations for NPS Units in Alaska* section, which references key provisions of the Alaska National Interest Lands Conservation Act (ANILCA). We request the section also include ANILCA Section 811(a) and (b), which addresses subsistence access:

Section 811(a) ensures rural residents reasonable access to subsistence resources on public lands. Section 811(b) authorizes the use of snowmobiles, motorboats, and other means of surface transportation traditionally employed for subsistence purposes, subject to reasonable regulation.

The *Wilderness* section on page 16 states “no permanent road, structure, or installation....is allowed within any study, eligible, proposed, recommended, or designated wilderness area, except as specifically provided by law.” For clarification, we recommend the document specifically recognize, either in this section or section 12, that the ANILCA Title XI process for transportation and utility systems also applies to designated wilderness (see similar recognition for *Access to In-holdings* on page 22).

For additional information about ANILCA Section 1110(b) access to inholdings, we recommend also referencing the Alaska Region's “*Interim Guide to Accessing Inholdings in National Park System Units in Alaska*” in the *Access to In-holdings* section on page 22.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'M'.

Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator