



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

## ANILCA Implementation Program

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February 1, 2013

Eric R. Veach, Superintendent  
Katmai National Park and Preserve  
P.O. Box 7  
King Salmon, AK 99613-2116

Dear Mr. Veach:

The State of Alaska reviewed the Wildland Fire Management Plan Environmental Assessment (EA) for Katmai National Park and Preserve and the Alagnak Wild River. The following comments represent the consolidated views of the State's resource agencies.

We recognize the Service's need to implement Director's Order 18 and that the EA provides policies and actions related to wildfire within its jurisdictional boundary in an effort to provide implementation consistency. We appreciate that the EA provides an outline of fire-related land use decision-making process and procedures. This formalizes park-specific responsibilities for implementation of the Alaska Interagency Wildland Fire Management Plan.

We support the Service's preferred alternative, which allows for the use of Prescribed Fire and Wildland Fire as management actions to accomplish goals related to hazardous fuel reduction and maintaining the role of fire in the natural environment. These are important tools that will ultimately help protect humans and valuable park resources in a cost-effective manner.

### **Page-specific comments**

Page 3, 1.2.1 Park Purpose and Significance, Park Purpose. We recognize this statement comes from the Katmai Foundation Statement; however, the Foundation Statement also clearly identifies the establishing purposes as described in ANILCA Section 202(2). We request the decision document cite the source of the "park purpose" statement in the EA and identify the park unit's purposes as established by ANILCA.

Page 24, Table 2-2 Summary of Alternative Impacts, Fish and Aquatic Habitat. The impact analysis focuses only on adverse impacts. We recommend the Service also take into consideration the beneficial long-term impacts to fish and aquatic habitat as the result of retaining the role of fire in maintaining riparian habitat.

Page 37, 3.10 Wilderness, third paragraph, third sentence. This section states “*Additional lands, consisting of approximately 643,448 acres, were determined eligible for wilderness designation and are managed under the terms of ANILCA to maintain the wilderness character and values of the lands **until designation recommendations have been proposed.** The full wilderness review process required under ANILCA section 1317(b) **has not been completed on those eligible lands.** Although an EIS was completed, there was no final action taken in the Secretary of the Interior’s office and no record of decision was published in the Federal Register. This leaves the eligible wilderness acreage managed under NPS policies **that protect wilderness character until Congress can act.**” [Emphasis added]*

ANILCA Section 1317 provided the Service with a one-time opportunity to conduct wilderness reviews of areas within Alaska park units not already designated as wilderness by ANILCA. ANILCA also directed the reviews be completed within five years and recommendations be completed within seven years of the enactment of the Act. The Service’s Section 1317 Wilderness suitability and recommendation reviews for Katmai were finalized and the proposed wilderness recommendations are reflected in a signed Record of Decision. While the full process outlined in ANILCA Section 1317(b) may not have been completed, the time limitation for doing so has long passed and ANILCA Section 1326(b) prohibits new studies without Congressional approval.

For clarification, we request the final decision document discuss the wilderness reviews conducted for Katmai in the full context of ANILCA Sections 1317 and 1326(b), recognizing the Service’s final decision and acknowledging the timeframe for submitting recommendations has expired.

In addition, we recognize the 2006 NPS national management policies direct the Service to manage eligible lands to protect wilderness resources and values. However, given the express limitations in ANILCA, we remain on record that we strongly disagree with this policy direction to indefinitely manage lands, which have not been congressionally designated as wilderness or even recommended for designation to Congress, in accordance with provisions of the Wilderness Act.

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

Sincerely,

/ss/

Susan Magee  
ANILCA Program Coordinator

cc: Bud Rice, NPS Alaska Region