

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

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6 October 1982

Mr. Bill Welch
National Park Service
540 West Fifth Avenue
Anchorage, AK 99501

Dear Mr. Welch:

The State agencies have reviewed the Draft Statement for Management for Kenai Fjords National Park. The following comments are provided to assist your revisions of the Statement for Management and development of the General Management Plan.

The Division of Land and Water Management, Water Management Section of the Department of Natural Resources, reminds the National Park Service that coordination with the Water Management Section is necessary prior to any action that may affect either dam safety or the availability of ground water or surface water. Also, certain activities upstream and out of NPS management area could impair the quality of the area by reducing the flow rate in streams. For these situations, it is suggested that NPS apply to this division for instream flow reservations.

Concerns have been expressed regarding the following statement on page 3 under Legislative and Administrative Requirements: "The federally-owned or controlled land of the park shall be administered..." Please identify the referenced 'federally-controlled but not owned' lands. We have been of the understanding that private and state lands adjacent to, or surrounded by, a unit in Alaska do not come under administrative oversight of the unit manager in the same manner as "inholdings" in other states.

The Alaska Department of Fish and Game notes that the Major Issues listed on pages 6 and 7 exclude two serious concerns previously discussed with your agency:

- 1) The State's desire to conduct fisheries research, management, rehabilitation and enhancement activities.

- 2) The requests that NPS pursue administrative or legislative changes to allow subsistence and sport hunters to resume their traditional uses in the unit.

On pages 8, under Management Objectives, reference is made to NPS' monitoring resource problems in and adjacent to the unit. An additional part of this objective should be to pursue necessary boundary modifications, described in Title I of ANILCA. Such modifications would facilitate ecosystem management based on hydrographic divides and other natural boundaries, consolidate land ownership and could facilitate the public's abilities to continue traditional uses.

NPS should prioritize making corrections to the official maps of the unit so that the public has accurate and updated land status information. Boundaries currently are depicted to extend over State waters and around State and private lands (such as Nuka Island). Such depictions are erroneous and result in public confusion of ownership and allowed uses.

In reference to both Visitor Use and Interpretations and Visitor Protection Safety sections, NPS should address guaranteeing traditional access sites and methods, consistent with the intent of ANILCA. The discussions intimate restricting traditional access while encouraging visitor use. Specifically, retention of existing landing strips which provide traditional access and establishment of emergency aircraft and boat landing areas should be addressed.

A dichotomy is apparent between NPS' administrative objectives (p. 8) and development intents (p. 10 & 11); NPS intends to administer the unit as a "natural" area yet discusses development and construction projects. These projects include headquarters site, visitor contact sites, trails, campsites, shelters, transportation corridors, and maintenance facilities. Such projects will change the undeveloped and "natural" characteristics of the unit which existed prior to designation. Please resolve this dichotomy so that your management objectives are clarified.

We look forward to receiving your revised Statement for Management. If we can provide any further assistance or information on behalf of the State agencies, please do not hesitate to contact us.

Sincerely,



Sterling Eide
State CSU Coordinator

cc: State CSU Contacts
Lisa Parker, State ALUC Staff Coordinator