

STATE OF ALASKA

DEPARTMENT OF FISH AND GAME

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16 April 1982

Mr. Terry Carlstrom
National Park Service
540 West Fifth Avenue
Anchorage, Alaska 99501

Dear Terry:

RE: Wrangell-St. Elias Scoping Document

The State's General Issues List for Conservation System Unit Planning addresses most of the questions in your Wrangell-St. Elias scoping document. The scoping document does not reflect all of the issues and was obviously designed to generate public rather than agency input. Various State agency representatives did provide the following responses to the document:

The last part of the second paragraph on page 2 regarding hunting and trapping allowed in a park is incorrect. It was unfortunate that this major error went out as a public information document. Additionally, no mention was made of the priority of subsistence use on both park and preserve lands.

In paragraph 3 on page 2 regarding subjects that the planning process can not address, we continue to maintain that this is policy of the National Park Service and neither law nor intent of ANILCA. Title XIII, Sec. 1301.(b) National Park Service Requirements--"Each plan for a unit...shall include at least the following:" "(6) A plan for acquiring land with respect to such unit, including proposed modifications in the boundaries of such unit." In addition, Title I, Sec. 103.(b) states "...the Secretary...may make minor adjustments in the boundaries of the areas...". Title XIII, Sec. 1302 further addresses land acquisition authority of the Secretary.

Specific comments to the questions are as follows:

Question 1. Visitor facilities should not be developed by the National Park Service except where there is a serious need and then 1) only through cooperative agreements with State, Native or other private landowners, and 2) only after private enterprise and landowners have been allowed adequate time and cooperation to meet such needs.

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Question 2. All items a through y, except s, are recognized as existing uses of the unit. Past and present primary uses of the unit include: hunting, ATV and snowmobile uses, flying, horsepacking, fishing, boating and trapping. None of these uses have serious conflicts at their present level. The National Park Service should not attempt to "emphasize" activities but recognize present uses; visitors (newcomers) should be made aware of the present and traditional uses and the legal protection for their continuance.

Over time and with increased numbers of unit users, conflicts may develop between motorized and non-motorized uses and users, between consumptive and non-consumptive users, and between subsistence and recreational users and uses. Protection of existing and traditional uses, as provided in ANILCA, should receive priority treatment in resolution of future conflicts. Subsistence Division of Alaska Department of Fish and Game further notes that subsistence "lifestyle" and "trapping" are not "recreational activities", as implied in the document, and ANILCA mandates that subsistence uses be accommodated in park planning.

Question 3. The responses include both a and b. Facilities are addressed in Question 1. Maintaining existing conditions is preferred (in continued allowance of existing cabins) over development of the unit, except when cooperatively determined needs dictate additional provisions.

Question 4. Responses include a, b and d, all opposing a mandatory registration. Local residents have been using the area for years, notifying friends of their whereabouts.

Question 5. Responses include a, e and f. The State's Issues List clarifies these responses by requesting that such services and activities be conducted or planned cooperatively.

Question 6. Responses include a through i; the latter suggestion was for information in avoiding wildlife/human conflicts. "The Federal agencies should continue...cooperative interagency public information programs" and "...shall cooperate in the preparation of announcements, publications, and the public dissemination of fish and wildlife information;..."

Question 7. Responses include a through g, except b. A State response is not appropriate except as stated in questions 5 and 6 responses above.

Question 8. The response a provided in the brochure was very biased in its presentation. Present access and use patterns are adequate, providing all the opportunities inferred in responses a, b and c.

Question 9. Responses include a through d, qualified to state that the road system allows access to all of these items currently. Closer access for such items is provided in many areas of the State.

Question 10. All responses are a, except one c. No National Park Service action is desired.

Question 11. All responses are a, except one that suggested cooperative maintenance.

Question 12. Responses include a, b and a suggested "rural road and bridge."

Question 13. Responses include a, b and c. Existing ATV uses and trails should be allowed to continue to be used as they are now. (The wording of the question indicates NPS has already made up its mind to limit operations.)

Question 14. Work out any possible limitations cooperatively with the State and public through the suggestions in a, b and d, but only when necessary to minimize environmental problems.

Question 15. All responses were basically a, except one b.

Question 16. Take no action except to maintain or replace existing bridges and trams.

Question 17. Responses include a, c and mostly f.

Question 18. Existing uses and use patterns should continue, and the NPS only regulate when there is a serious demonstrated need.

Question 19. Responses all maintain that the National Park Service not close any airstrips. Answers a and b were supplemented by a qualification to c: most airstrips are on private land within the park and may be closed to hunters and other users; a few strategic airstrips may be needed for access to replace those lost or closed as a result of the creation of the unit.

Question 20. The results of the Denali Scenic Highway study will determine the road's status. People can not be expected to answer this question responsibly when they don't know the implications of designation. It should be noted that the road is owned by the State in fee simple.

Question 21. Responses include b, c, d, e, h(cooperatively); basically all of these answers are the same as the response a, "no change" but with increased maintenance. The road is owned by the State in fee simple.

Question 22. Responses include a, b and c! Allow the natural fire regime in most of the unit. The National Park Service should direct prescribed fires as recommended by the State (ADF&G), in areas where wildfire would be dangerous. If some aggressive management is not begun, 1) most wildlife habitat will be lost, and/or 2) vast uncontrollable fires could occur.

Question 23. Responses include a, b & d. The present level of horse use is satisfactory. If horse use becomes a problem with forage, the National Park Service should cooperate with ADF&G on a solution. Is NPS considering leasing?

Question 24. No; unless a cooperative program is needed for representing unique historic resources.

Question 25. No.

Question 26. See answers to questions 1 and 3.

Question 27. See answers to questions 1 and 3.

Question 28. Responses include a and b, as applicable, leaving the private land owners alone.

Question 29. As applicable through cooperative planning.

The following are quoted additional comments which were provided to us:

"It is unfortunate that the Park Service chose to distribute the workbook before it received a thorough review from other agencies. The workbook contains errors of commission and omission which seriously impair its usefulness as an instrument for gauging public opinion and for informing potential users about the park."

"Often, the questions designed to elicit public response employ terms which the general public may not be familiar with, such as "interpretive trails", "traditional trails", and "wilderness". These important concepts are not defined."

"The Sport Fish Division of the Alaska Department of Fish and Game is concerned that the National Park Service provides for continued State management of recreational fishing waters within the Wrangell-St. Elias National Park.

"Recreational angling opportunities within the Park boundaries are limited, primarily due to lack of access to many water bodies. There are numerous water bodies that could provide additional recreational angling if access were to be developed.

"At the present time the Sport Fish Division is stocking fish in Van, Sculpin and Strelna Lakes all located along the Chitina - McCarthy roadway. These lakes presently provide about 3,000 man-days of fishing each year. With improved access these lakes could satisfy a substantial increase in recreational demand that may occur.

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"The present road access to Sculpin and Van Lakes is in private ownership. The present owners have allowed unrestricted access to the lakes and are expected to do so in the near future. Strelna Lake access is along a 1/4 mile trail that apparently crosses native allotments. Anglers have had no access problems in the past but it is uncertain how long this situation will continue. Each of the three lakes are accessible by floatplane and should remain so.

"Also along the Chitina - McCarthy road is Long Lake which provides recreational angling for sockeye salmon, coho salmon, grayling, Dolly Varden, lake trout and burbot. Long Lake is located immediately adjacent to the road and public access should be maintained or improved. Long Lake is also accessible by floatplane.

"Lou's Lake is situated about one mile off the road and is near Sculpin Lake. It contains coho salmon and grayling and would provide recreational angling opportunities if an access trail were developed.

"Numerous small lakes in the Dan - May Creeks area contain grayling, Dolly Varden, and burbot. These lakes are along an old road which has long been isolated due to collapse of the bridge across Mizina River. Excellent recreational fishing would be available in this area if access could be improved. There is presently an old airstrip located near May Creek which may be usable.

"Copper and Tanada Lakes are two large lakes located within the Park and provide recreational angling for lake trout, burbot, kokanee, and grayling. These lakes can be reached by floatplane and ATV. The ATV trail is used during summer and winter months as an access route to these lakes. Snowmachines commonly use the trail during the winter.

"On the Nabesna Road there are several lakes which provide recreational angling for grayling, burbot, and lake trout. Most notable are Twin, Long and Jack Lakes. Although these lakes are adjacent to the road system only Jack Lake has road access which is private.

"We would like to have the National Park Service support the State's recreational fishing program and assist by developing or upgrading access routes whether they be trails or secondary roads.

"We feel strongly that no restrictions should be placed on the use of outboard motors within the Park area until there is a need necessitated by the proliferation of large powerboats. We feel that lack of access and boat launching facilities will preclude use of large powerboats. The remoteness of most lakes in the Park and distance from major urban areas will not attract larger boats.

"Float plane restriction should not be imposed on any lakes within the Park unless for safety reasons. Float planes are the only means of access to many recreational fishing lakes in the Park."

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Another omission was snowmobile usage. Snowmobiles used for recreation, hunting and trapping during fall and winter cause little environmental damage and should be treated separate from ATV's. We recommend that after adequate snowfall has accumulated, snowmachines not be limited to trails and only Alaska Department of Fish and Game identified critical winter habitats be considered for snowmobile restrictions.

The State CSU Contacts thank you for the opportunity to participate and comment on issues for planning of the Wrangell-St. Elias unit. We look forward to working with you throughout the planning process toward the implementation of ANILCA in the public's interests.

Sincerely,



Sterling Eide
State CSU Coordinator

cc: State CSU Contacts