

267-2202

File: CSU-NPS-GAAR

10 January 1983

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

Dear Mr. Welch:

Thank you for the time extension for the State agencies to provide comments on the Statement for Management for Gates of the Arctic National Park and Preserve. The following comments provided by the State CSU Contacts are intended to assist your efforts in revising this document and preparing the General Management Plan.

According to National Park Service Planning Guidelines, NPS-2, "The statement for management gives a concise description of the park's purpose and the way it is currently being managed, operated and utilized; ..." and other analysis, reports, issues and objectives. Reviewers of the GAAR Statement for Management commented that it does not describe current management and operations and only superficially mentions the other requirements. We hope that NPS will prepare and provide a final Statement for Management which fulfills the requirements of NPS Planning Guidelines so that the State and public are informed of management policies and practices. Specific comments are as follows:

Page 4: Gates of the Arctic National Park and Preserve is said to be one of four major Federal reservations in Arctic Alaska. While "major" and "Arctic" are not clearly defined, shouldn't the following 7 CSU's also be included as "major Federal reservations in Arctic Alaska?"

Bering Land Bridge National Preserve  
Cape Krusenstern National Monument  
Kobuk Valley National Park  
Alaska Maritime National Wildlife Refuge;  
    Chukchi Sea and Bering Sea Units  
Kanuti National Wildlife Refuge  
Selawik National Wildlife Refuge  
Yukon Flats National Wildlife Refuge

Page 5: NPS cites two sections of ANILCA as 'outlining the purpose' of the park unit: Sec. 101 and 201. Sec. 101 lists several purposes; NPS cites only one. The other purposes NPS did not recognize include among others: scientific research opportunities; fishing and sport hunting recreational opportunities; opportunities for continuance of a subsistence way of life; and maintenance of sound populations of wildlife. These purposes should have been provided as background for the reviewing public in addition to the one NPS selected.

Under Sec. 201 (4) NPS quotes the administrative directions in subsection (a), describing purposes for which the unit will be managed but omitting the following supplemental direction: "Subsistence uses by local residents shall be permitted in the park, where such uses are traditional, in accordance with the provisions of title VIII." The additional four subsections of Sec. 201 also provide administration directives. The omitted directives should also be reiterated: (b), (c), (d), and (e) identify the need for, require permitting of, and describe procedure for providing access across the unit from Ambler Mining District to the Alaska Pipeline Haul Road.

Page 5 and 6: Descriptions of the unit, derived from ANILCA legislative history, are quoted as part of the 'purposes' section. Many other descriptions and 'purposes,' not cited by NPS, are also found in the legislative deliberations. Included are discussions of the historic Anaktuvuk Paes village and uses of the area, historic and nationally significant mining zone and the lack of developments within the GAAR area. Congressional discussions are interesting but, when only selectively cited, may not be pertinent to a complete discussion of purposes of the unit.

Pages 7 and 8: Legislative and Administrative Requirements. ANILCA effectively amends some of the existing federal laws and regulations, intending management in Alaska to be more sensitive and flexible than in other areas within the park system. NPS should inform its respective publics of this legislated liberalization of NPS management as well as the more stringent management allowance referred to on page 7.

Page 11: Other Research. Subsistence Division of ADF&C requests that the referenced studies be clarified by listing documents and other information sources. These would assist pertinent information searches and decision making, especially regarding land use and subsistence. This request also applies to page 13, Research.

Pages 11 and 12: Maps and Boundaries and Land Status Data. The State agencies request that NPS consider a management priority of producing corrected Land Status maps. The "official" USGS 1:250,000 maps for the unit do not show the private lands encompassed by the unit. Clarification of non-NPS lands needs to be completed for the public's benefit. The existing maps are inaccurate and misleading.

Boundary adjustments may be necessary for improving management of the unit, as directed in ANILCA Sec. 103(b) and 1301(b)(6). The State has requested consultation by NPS for identification of areas needing such adjustments or land exchanges. Pursuing such information and implementing necessary changes should be a management priority in the document, since NPS Planning Guidelines require land acquisition of boundary adjustment requirements to be included in the General Management Plan. This topic should also be included on page 13, sentence 2, as a research topic for the park manager.

Page 13: Research. Referencing "park managers will rely on the guidelines established in this document," where are the guidelines?

Page 14: The last paragraph indicates that this document is intended "to provide interim guidance in the management of the new park and preserve." Most reviewers indicated dissatisfaction with the "guidance." A typical comment follows:

"We're frankly puzzled by this document's purpose which makes review difficult. It certainly doesn't contain guidelines 'to provide interim guidance in the management of the new park' as it professes. Parts read like an advertisement to come view the park, an issues list, or a request for information. Some of it does even sound suspiciously as if they (NPS) are leading up to a guideline, but then stops short of a clear policy statement. My first recommendation is that the authors should determine what use the document is to be put to and rewrite it with the goal(s) clearly in mind. The superlatives and interpretative remarks are not needed unless the purpose of the Statement of Management is determined to be the attracting of visitors who might otherwise go to McKinley."

The parameters of the General Management Plan are clearly established in ANILCA Sec. 1301(b), (c), and (d). The Statement for Management should not and does not "establish them," as stated in this paragraph, nor does it clarify intended management procedure to fulfill those requirements, in most cases.

Page 15-17: Subsistence Division of ADF&G notes that subsistence resources of the unit are as significant as other resources discussed. NPS should recognize that traditional uses by residents of the area are priority considerations which should be discussed in conjunction with significant resources.

Game Division of ADF&G requested the following correction: bears, fox, moose and wolves are not characterized by "spectacular local, seasonal or cyclic abundance."

Commercial Fisheries Division of ADF&G notes that two paragraphs discuss significant wildlife resources but do not mention fish. Chum and king salmon, sheefish, char and many more fish species are "characterized by spectacular local, seasonal, or cyclic abundance." The fish resources have also "been of major importance to man's survival," and "continue to play an important role in the economy of the region." The large chum salmon and sheefish populations in the Noatak and Kobuk Rivers are particularly significant wildlife resources in the area. Chum and king salmon also spawn in the Alatna and North Fork of the Koyukuk Rivers within the park. The salmon and sheefish spawning within the unit contribute substantially to downstream commercial and subsistence fisheries. These fish also are important to the limited subsistence fishery within the unit. Therefore the exclusion of the fishery resources is a major omission in the document.

Page 18: Lines 3-4 under A. Recreation should reference the use of snow machines and other ORV's, which are also important modes of access.

Lines 5 and 6. Alaska Department of Natural Resources (ADNR) asks if the 4,000 users and 576,000 visitor hours listed reflect tourists or residents or both?

Lines 7 and 8. Alaska Department of Commerce and Economic Development, Division of Tourism, informs us that the figure cited for increases "in recreation and tourism during the next five years" needs revising. The 15% annual increase figure is two years out-of-date. Current projections for the next five years indicate a cumulative Statewide annual increase of tourism to be 5 to 10 percent. There are no figures available nor no known method for projecting general recreation in Alaska.

Under 1. River Running, the use of jet boats was omitted.

Page 19: Paragraph 1, second sentence, is not quite accurate, according to Alaska Department of Public Safety, Division of Fish and Wildlife Protection. The Alaska Guide Board assigns "exclusive guide areas" to licensed guides. Assignments are based on occupancy, financial investment and prior use. There may be joint use of an "exclusive guide area" by 3 or 4 guides. In other words, other guides can not guide in the area, but more than one guide may be assigned the same area. NPS should note that the Alaska Guide Board "sunssets" 30 June 1983 unless new State legislation is passed to establish a new Board. The Park manager needs to be aware of the potential change.

Under 3. Hiking and Backpacking, the following comment is incorrect: "Though no trails exist in the Park/Preserve... ." There are many traditional trails, trade routes, and travel corridors within the unit. The following four locations are examples:

1. Kutuk Pass; between July Creek, April Creek and Unakserak River travel routes.
2. Glacier Pass; between Glacier Creek and Wiseman Creek
3. John River; adjacent winter road.
4. Middle Fork Koyukuk River; winter trail adjacent and to the north.

Page 20: Paragraph 2. Subsistence activities also extend into Noatak drainage and Itkillik River area.

Paragraph 3. "Subsistence Management Program" will be developed by the State if it meets the requirements of ANILCA Title VIII. Discussions of cultural and wildlife programs should be included in the General Management Plan, as required by ANILCA Sec. 1201(b)(2), not in a separate planning document.

C. Mining. The transportation corridor discussed in the second paragraph is mandated by ANILCA, regardless of NPS' concern for "affects." Also we are not aware that a study has been completed on the various alternative routes and their impacts. We would appreciate knowing the source of the conclusion in the last sentence of the paragraph.

A transportation corridor from Chukchi Sea to the western boundary of the unit to serve the Red Dog Project in the De Long Mountains is being considered. The resulting additional access and population shifts will necessitate different management guidelines and should have been addressed.

Division of Minerals and Energy Management (DMEM) of ADNR provided the following supplementary information to Mining, page 20 and Oil and Gas Interests, page 24. The northern edge of the CSU overlies the North Slope sedimentary basin. Though State lands within this basin are not presently scheduled for leasing, they may be of future interest for oil and gas exploration and development. Also, the 3/9/82 DMEM status plats (attached) show concentrations of mining claims lying near and adjacent to the southern and southwestern CSU boundaries.

Pages 21-23 and 26: References are made to private lands surrounded by and adjacent to the Park. NPS's intent to acquire, cooperatively manage or influence these lands is intimated but needs clarification.

Page 21: Paragraph D. It is assumed that permits are not needed by ADF&G to conduct routine research and management programs, nor by ADNR and ADEC for conducting water use and study activities.

Page 22: Paragraph 3. Trapping was omitted and is a permitted use.

Page 27 and 28: Transportation and Access Division of Forestry of ADNR requests that traditional transportation methods continue to be allowed without permits. FRED Division of ADF&G also notes that NPS indicated an intent to restrict access. Proper notification, negotiation and public hearings prior to such restrictions should be recognized in this document.

The issue of access methods and means within wilderness units was extensively discussed in ANILCA legislative history. The final intent states that access will be liberally allowed rather than restricted. NPS appears to be ignoring Congressional intent in the second to last paragraph.

NPS only briefly recognizes aircraft access in the entire document. Some place aircraft should be identified as the most feasible and popular access method to most of the unit. Traditional aircraft landing sites exist throughout the unit, including lakes, vegetation clearings and unmarked strips.

Pages 28 and 29: NPS should recognize the related access and resource issues raised in the State's General Issues List. For example, paragraphs 2-4 should be expanded to address other issues such as aquaculture projects and recreational or subsistence timber use.

Paragraph 4. NPS should acknowledge the State as having primary responsibility for managing subsistence and sport uses of fish and wildlife.

Page 30: Paragraph 3. The Final Statement for Management should reflect the Memorandums of Understanding that have been entered by State agencies and NPS.

Pages 31-33: The listed Management Objectives should have been developed to meet the purposes of ANILCA Sec. 201(4) and legislative intent. Some of the objectives appear to be at odds with both. For example, the last paragraph on page 32 is at variance with intent regarding use and restrictions of aircraft.

Page 31: Paragraphs 4-8. Should be included in the General Management Plan as required by ANILCA Sec. 1301(b), not in separate documents as indicated here.

Paragraph 4. Management objectives for the unit should also include cooperation with local governments, such as city councils, as well as other rural affected organizations concerned with resources uses in the unit.

Paragraph 7. This objective should be qualified "in cooperation with the State of Alaska" since this is the State's responsibility.

Page 32: Paragraph 2. Is it NPS' intent to include the river management plans in the GMP or produce these separately?

ADNR requests that paragraph 3 beginning "Assure compliance of mining interests," be re-written to be less biased; 'compliance with State and Federal regulations and laws' would be more objective and appropriate.

Paragraphs 5 and 6; page 33, paragraphs 1-3, 5. Provisions of visitor programs and facilities will cause conflicts with resources. Additionally, legislative intent reflected that the appeal to designate the unit was the lack of these developments and intrusions. Interpretive guides are not needed and will detract from the wilderness nature of the unit. Therefore these objectives do not seem appropriate.

Page 32: Paragraph 6. "Provide visitors with adequate and feasible access" implies creating new or improved access upon visitor demand. This is not consistent with legislative intent in designating this unit. Existing access occurs throughout the unit and should not be restricted or developed. Protection of existing access is consistent with legislative purposes in designating the unit: "provide continued opportunities, including reasonable access, for...recreational activities."

Paragraph 8. ADNR suggests revising "the opportunity" to read "opportunities," since a unit-wide restriction would not be developed as the original wording implies.

Page 33: Management objectives should have included the wilderness review for non-designated Park lands, as required by Sec. 1317 of ANILCA. Since this objective was not included, are we to assume the wilderness review will be done separately from the GMP?

The Alaska Department of Natural Resources, DNEM, reminds NPS 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.

Appendix A: Page 2. NPS indicates that the Wilderness Act "prevails in matters of management and uses" for most of GAAR. It is hoped that the management differences required for wilderness park versus non-wilderness park lands will be clear in the GMP. It is also noted that the Wilderness Act is amended by ANILCA in more than just creating additional units in the system.

Page 7. The State's responsibility and authority to manage fish and wildlife is affirmed here, as well as on page 7 under Legislative and Administrative Requirements. However, there is concern regarding the several references in this document to permits being required. For example, page 11, B. Other Research "Alaska Department of Fish and Game...will continue under appropriate permits;" page 21 within section D. Scientific Research "which requires advance written approval from the Superintendent." These references, along with an unsolicited permit which an employee of Commercial Fisheries Division of ADF&G received,



indicate permits may have to be obtained despite the State's authority. One ADF&G reviewer commented that such permits "have no value beyond taking up filing cabinet space" as well as additional man-time. "It seems that the legislative instruction is a sufficient permit for our continued operations."

Commercial Fisheries Division of ADF&G stated "Our management activities in the area are annual surveys (low level aircraft, boats w/outboard motors and on foot) to assess the distribution and abundance of salmon and sheefish. Temporary tent camps occasionally are required to conduct biological investigations. Periodic aircraft landings on rivers, lakes and gravel bars are needed to deploy and support crews. Other activities that may occur in the future are operation of counting towers, weirs, nets, traps, electroshocking, sonar, egg-alevin pumps, shotguns (to collect tags from spawning salmon). Since our activities are virtually identical to the ones described on page 25 as necessary for the park staff and since we share management responsibility with the park staff; what need is there for special permits? If the purpose of the Management Statement is to 'provide interim guidance to the management staff,' shouldn't there be a clear statement of who, what, when and where permits are required?"

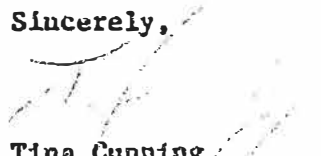
Other State activities, access needs, and management responsibilities are detailed in the attached State's "Resource Management Recommendations for Gates of the Arctic National Park and Preserve, 13 September 1982." Please let us know if your planning team needs additional copies.

The State agencies generally expressed concern over the lack of detail or specific policies within the document. NPS has policies to deal with several issues mentioned, but the policies were not discussed. By not clearly indicating committed actions, alternatives or planning, the "guidelines for management" are not available and management intent must be interpreted between the lines. We hope that the General Management Plan being written for the unit will be detailed and complete as required by ANILCA. We offer our assistance in providing information for, and request participation in, development of the GMP.

We understand that you received comments dated 27 May 1982 directly from the State Historic Preservation Officer and the Land and Water Conservation Fund Grant Program. We have copies if you did not.

Thank you again for the time extension and for the opportunity to participate in this phase of ANILCA conservation system unit planning. We look forward to further opportunities to participate and toward providing additional information from the agencies, as needed. Please do not hesitate to give us a call.

Sincerely,



Tina Cuning  
State CSU Assistant

For: Sterling Eide  
State CSU Coordinator

Attachments

cc: State CSU Contacts  
Lisa Parker, ALUC