

BILL SHEFFIELD, GOVERNOR

CSU Planning Office
333 Raspberry Road
Anchorage, Alaska 99502

Phone: 267-2199
File: CSU-NPS-BELA

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Bill Welch
National Park Service
540 West Fifth Avenue
Anchorage, AK 99502

Dear Mr. Welch:

The State agencies appreciated the opportunity to comment on the Draft Statement for Management for Bering Land Bridge National Preserve. The following comments provided by State CSU Contacts are intended to assist your efforts in revising this document and preparing the General Management Plan.

In general, our reviewers commented that NPS had followed its Planning Guidelines adequately in preparing this draft. Hopefully, the upcoming General Management Plan (GMP) will present a more detailed discussion of how management plans will address provisions of ANILCA Title II, as mandated by ANILCA Title XIII. We suggest that the GMP also provide more complete documentation when referring to trends and other data, and that it elucidate the distinction between Preserves and Parks (ANILCA Sec. 203).

It was also suggested that for clarification, "Preserve" be capitalized when referring to Bering Land Bridge Preserve and left in the lower case when referring to protection. Finally, we received a comment that the Statement was optimistic and that NPS has not indicated what management priorities will be undertaken if funding proves inadequate to implement the entire plan.

Specific comments are as follows:

INTRODUCTION - The management statement is not sufficiently detailed to be a "current inventory of preserve resources... ." It is more of an "overview of Preserve resources."

Page 2, paragraph 1: The "53,000 acres of State owned tidal and submerged lands" are not part of the Preserve, see ANILCA Sec. 103(a).

Page 2, paragraph 2: The phrase "snowmobiles might be used" should read "snowmobiles are used" (see page 8, paragraph 1 of your document).

Page 3, paragraph 1: "bisons" should read "bison."

Page 3, paragraph 6: It should be noted that the marine mammals identified on the endangered species list are on the Federal endangered species list--not the State list as identified in 5 AAC 81.390.

Page 3, paragraph 6: The mammals species list should include caribou, reindeer and muskoxen.

Page 4, paragraph 2: Although it is not necessary to document, verbatim, the federal laws governing the administration of this Preserve, this section, as it current stands, seriously underplays the relative role of the State, and more specifically the Department of Fish and Game (ADF&G), in the management of the Preserve's fish and wildlife resources. The passage of ANILCA effectively amended several existing federal laws and regulations and provided that federal management in Alaska should be more sensitive and flexible than in other Park Service units outside of Alaska. The description of governing laws and regulations should designate these differences and stipulate the State's role under Sections 1313 and 1314 of ANILCA.

Page 4, paragraph 4: ADF&G and the Boards of Fish and Game currently have the authority and procedures to deal with resource allocations. NPS should acknowledge this when referring to potential conflicts.

Page 4, paragraph 5: ORV should be preceded by "Off Road Vehicle," as this is the first use of the acronym in the document.

Page 4, paragraph 5: ANILCA Sec. 201(2) also restricted reindeer grazing to "within the areas which on January 1, 1976, were subject to reindeer grazing permits" (emphasis added).

Page 5, paragraph 1: The phrase "not a traditional activity with a long history" is a value judgement, as 'traditional' does not reflect a specific time period, and should be deleted.

Page 5, paragraph 2: ADF&G, Habitat Division, notes that the potential for habitat conflicts, particularly on winter ranges, between reindeer and caribou in the eastern portion of the Preserve should be identified.

Page 5, paragraph 2: The last sentence in this paragraph is the only mention of predators in the document. ADF&G, Game Division, requested a more detailed discussion of this matter in the GMP.

Page 5, paragraphs 3-8: Alaska Department of Transportation and Public Facilities indicates that the document does not realistically consider mining potential (ANILCA Sec. 1010(a)) and attendant route corridors (ANILCA Title XI). This Mining Section fails to take into account the possibility of a transportation corridor linking the Ambler Mining District and Nome, a route which is now being evaluated. It also fails to consider the future extension of the proposed Kotzebue to Chicago Creek Road to Nome. Both of these routes would directly affect the Preserve and a possibly resulting in increased tourism.

MAP entitled "ZONES" - Inclusion of a few village names, Trail Creek Caves and Serpentine Hot Springs on the map would be beneficial.

Page 6, paragraph 1: Trapping for "recreation, partly for cash income and partly in pursuit of a subsistence lifestyle" most times cannot be distinguished. Trapping should be viewed as a valid, compatible utilization of the resource which produces an economic return, regardless of the economic system.

Page 6, paragraph 2: Numbers of trappers and trapping harvest data for wolves, wolverine and lynx in the Preserve area are available from ADF&G, Game Division, Nome.

Page 6, paragraph 4: Sections 203 and 1313 clearly authorize the NPS to regulate trapping for reasons "of public safety, administration, floral and faunal protection, or public use and enjoyment." It should be noted, however, that Section 1313 also provides that "except in emergencies, and regulations prescribing such restrictions relating to hunting, fishing, or trapping shall be put into effect only after consultation with the appropriate State agency having the responsibility over hunting, fishing, and trapping activities."

- Page 7, paragraph 4: The primary objective of most hunting, be it sport or subsistence, is to obtain meat. Furthermore, AS 16.30.010 mandates that hunters must salvage edible meat from all big game animals killed, with the exception of bears.
- Page 7, paragraph 4: There is no reason to differentiate between native and non-natives who eat moose meat.
- Page 7, paragraph 5: Guides are assigned exclusive guiding areas, not exclusive hunting areas. NPS should also be aware that the Alaska Guide Licensing and Control Board will "sunset" in June 1983, unless State legislation is passed authorizing the continuation of this Board.
- Page 8, paragraph 6: As visitor use of Bering Land Bridge National Preserve increases, NPS should coordinate with transportation infrastructure providers to effectively handle increased traffic into the area in a manner which avoids proliferation of "unsightly" trails.
- Page 9, paragraph 2: The phrase "throughout the preserve," suggests grazing permits cover the entire Preserve. See our comment on page 4, paragraph 5 regarding grazing limitation.
- Page 9, paragraph 2: ADF&G, Habitat Division, again notes that the potential for reindeer/caribou habitat conflicts, particularly for winter range, needs to be addressed.
- Page 9, paragraph 3: ADF&G, Habitat Division indicated that the fire management policy addresses the issue fairly adequately but could be improved by noting that recent range studies have indicated that reindeer/caribou winter forage areas have also be improved through fire-induced successions in some cases. However, because reindeer herding activities are restricted to a specific area, it may be necessary to control wildfires such that only portions of ranges are allowed to burn at any one time.
- Page 9, paragraph 4: It should be noted that the Board of Game, not ADF&G, sets the seasons, means and bag limits. Also, NPS should recognize and adopt Wildlife Management Plans developed by ADF&G for wildlife occupying the Preserve.
- Page 9, paragraphs 4 and 5: A more complete discussion of the State's authority and the mandatory cooperative management as addressed in ANILCA Sec. 1313 and 1314 should be provided here.

Consistent with past policy, ADF&G is opposed to provisions which restrict the State's opportunity to develop enhancement programs or manipulate habitat for the restoration or production of fish and wildlife.

- Page 10, paragraph 2: "reindeer grazing" should read "reindeer herding."
- Page 10, paragraph 4: The first sentence should be restructured for clarity.
- Page 10, paragraph 5: When referring to the question of access, NPS should reference the applicable sections of ANILCA: Section 811 (subsistence), Section 1323(b) (access to non-federal inholdings) and Title XI (access corridors).
- Page 11, paragraph 2: "for the protection and preservation of resources," should read "for the protection of resources." ANILCA section 201(2) mandates protection, not preservation.
- Page 11, paragraph 5: ANILCA Sec. 1308 mandates the preferential hiring of local residents with specialized knowledge of the area, regardless of certain personnel policies. NPS should reference this Section here.
- Page 11, paragraph 7: Natural resource management objectives should specifically address the mandated role of ADF&G and the ADF&G/NPS Memorandum of Understanding (MOU) regarding the management of Preserve fish and wildlife resources.
- Page 11, paragraph 8: There are several redundant phrases throughout the next few pages which reviewers indicated should be clarified or deleted. Among them are: "long-term perpetuation," (pg. 11, para. 8), "information and data" (pg. 12, para. 2 and 5), "protection and perpetuation" (pg. 12, para. 6), "study and inventory" (pg. 13, para. 3), "protection and safety" (pg. 13, para. 6), "observe and collect data" (pg. 14, para. 2).
- Page 12, paragraph 1: The first sentence should refer to "protection of natural wildlife populations" not "natural wildlife." Also, see our comments on Page 11, para. 2 regarding "preservation."
- Page 12, paragraph 2: This sentence is extremely vague. More specifics should be mentioned as to what species and impacts will be investigated and what methods will be used. The phrase "and thereby determine the shapes and substances of the environment" should be deleted.
- Page 12, paragraphs 1 and 2: These paragraphs should reference the ADF&G/NPS MOU which states that the agencies will conduct research programs cooperatively.
- Page 12, paragraph 3: The ADF&G/NPS MOU already gives the agencies a starting point for cooperative agreements on both consumptive and non-consumptive uses of natural resources. This

entire Natural Resources section should support continued development of close cooperation with the State in conducting its responsibilities in natural resource management and related research on the Preserve.

Page 12, paragraph 4: Man, regardless of lifestyle and residence, is a part of the ecosystem and should be treated as such.

Page 13, paragraph 2: NPS should indicate on which "public" they intend to focus their materials and programs.

Page 13, paragraphs 7 and 9: Existing Search and Rescue authorities already have established procedures for their mission. NPS should adopt these, using existing personnel to the greatest extent possible.

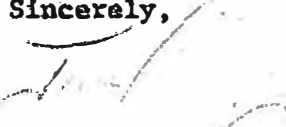
Page 14, paragraph 7: As indicated in NPS response to the State Issue List, NPS does not have the authority to make cooperative agreements with the USSR. The State would appreciate being consulted during the development of such agreements, as agreed to in the ADF&G/NPS MOU.

Page 18, paragraph 4: "Section 303(i)" should read "Section 303(1)(i)."

Hopefully, these comments, along with the Resource Management Recommendations and our General Issues List will assist you in completing your General Management Plan for Bering Land Bridge National Preserve. Thank you again for the opportunity of reviewing this document and for the time extension for the review. We look forward to continued cooperation and providing additional information you may need.

If we can be of any further assistance, please do not hesitate to call on us.

Sincerely,


Sterling Elde
State CSU Coordinator

by: Tina Cuning
State CSU Assistant

cc: State CSU Contacts
Lisa Parker, ALUC
Larry Rose, NPS