

STATE OF ALASKA

BILL SHEFFIELD, GOVERNOR

CSU Planning Office
333 Raspberry Road
Anchorage, Alaska 99502

August 26, 1983

Roger Contor, Regional Director
National Park Service
2525 Gambell St., Room 107
Anchorage, AK 99503

Dear Mr. Contor:

The State Conservation System Unit (CSU) Contacts have completed their review of the Draft Kenai Fjords General Management Plan (GMP) and Environmental Assessment (EA). Overall, reviewers found the GMP and EA to be well written and to contain excellent maps. The reviewers were also complimentary of the way in which both the Alaska National Interest Lands Conservation Act (ANILCA) requirements and the concerns expressed by the State in their General Issues List are addressed in the GMP.

Although the GMP does not explicitly state that it is written to fulfill ANILCA Section 1301 requirements, State CSU Contacts noted that it complied with most components of that section. To meet the requirements of Section 1301, the final plan should include the following:

- 1301(b)(1): Required maps indicating historical, cultural, archeological and paleontological resources within the park.
- 1301(b)(5): Documentation of plans for hiring local residents for the park staff.
- 1301(b)(6): Any proposed boundary modifications should be discussed in the GMP, including the State's request for boundary changes around Beauty Bay.

General Comments

In discussions regarding the Kenai Fjords draft GMP at an inter-agency meeting on August 4, 1983, it was apparent that references to Park facilities development and operating procedures should be included. The Department of Environmental Conservation is in general agreement with the draft GMP and commends the NPS staff for their efforts to reconcile Park management objectives with State resource management

responsibilities. However, because long-term environmental impacts and resource demands will result from park facilities development and operation, references should be incorporated within the GMP regarding planning for such impacts or demands. Specifically, attracting and providing for visitors will require waste water facilities, potable water systems, and solid waste and litter clean up and disposal. Also, because a major share of visitor activity will be via marine access, a fuel spill response capability needs to be addressed. Potential impacts and monitoring requirements for valid mining claims within or adjacent to the Park should also be addressed. Although it may be assumed that all parties understand that the NPS will comply with existing regulations, we believe that for public information and agency coordination purposes, these requirements should be emphasized. It would be helpful to add a brief narrative under the section on "Affected Environment," entitled "Facilities Operation Plans" discussing the specific intent of the NPS in these matters.

During the August 4 meeting, a NPS representative was asked why the State's request for NPS assistance in expediting conveyance of lands around Delight and Desire Lakes was not addressed in the GMP. He stated that the NPS was informed that Delight Creek had dried-up this summer and the State was no longer interested in the area. While it is true that the creek dried-up, Alaska Department of Fish and Game (ADF&G), Cook Inlet Aquaculture Association, and Port Graham Native Association are still interested in using land around Delight Lake for maintaining the option of building a fish hatchery as well as implementing fishery rehabilitation techniques in both Delight and Desire Lakes. For these reasons, we reiterate our request that this conveyance be assisted by the NPS and be addressed in the GMP.

Topics discussed during the meeting and those presented in the GMP indicate that land status will be a major issue in planning for and managing Kenai Fjords National Park. The GMP mentions the possibility of resolving management problems which may result from Native and State landholdings within the Park by land exchange. Unfortunately, it overly generalizes the potential of this possibility. The GMP should specifically identify and prioritize both Native and State lands within Park boundaries which the NPS believes might conflict with park management objectives. Additionally, the parklands which NPS may be willing to exchange should be identified.

In several instances, the GMP alludes to the possibility of cooperative management agreements being a means by which park objectives might be realized. Although this possibility certainly exists, the GMP should better identify the areas and mutual management objectives to be attained by a cooperative management arrangement. For example, the preferred alternative under Native Corporation Selections (page 65) suggesting cooperative management agreements does not appear to be as effective an alternative for the NPS to achieve park management objectives as acquisition of the land through land exchanges.

Because of the limited amount of National Park land in Alaska which may be available for exchanges, we recommend the Native and State lands which the NPS wishes to acquire be prioritized.

The GMP also seems to take the position that State lands within the designated boundaries of the Kenai Fjords National Park are to be managed by the NPS, consistent with other federal lands within the Park. Inferences that State lands within the boundaries of Kenai Fjords are anything other than State owned and managed lands should be eliminated from the GMP. ANILCA Section 906(o) provides that lands validly conveyed to the State of Alaska are not subject to any provisions otherwise inherent in a CSU. The ANILCA Section 1302 also provides that the only means available for the Federal government to use in order to acquire State lands within a CSU is through a willing seller or mutually agreed to land exchange between the parties. Therefore, although the State has no objection to language in the GMP exploring the possibility of developing a cooperative management agreement and visitor facilities (i.e., Nuka Island), language should be inserted in the GMP which makes it clear that the GMP has no effect on State lands or management thereof.

As an aide to future planning efforts, you are advised that the Division of Land and Water Management has initiated survey and land classification for the Petrof View Subdivision. The subdivision is located on the coast northwest of Nuka Island and south of Petrof Lake. Sale is intended in the spring of 1984. If needed, we will provide you with additional information on the sale.

Specific Comments

Page 5, Region Map: "Cordova" should be "Cordova."

Page 7, paragraph 2: We request that the NPS rephrase its language in the last sentence of this paragraph to reflect the State's authority to manage State lands within the Park boundary.

Page 15, paragraph 1: Although aircraft utilizing the Seward airport provide access to the Park, it should be noted that the airport itself is 10 miles outside of the Park boundaries.

Page 22, paragraph 7: "... research census data is lacking..." should be "... research census data are lacking..."

Page 24, first line: "petrols" should be "petrels."

Page 24, paragraph 1: "Kenai white-tailed ptarmigan" and "Valdez spruce grouse" are currently not considered to be distinct from other white-tailed ptarmigan and spruce grouse in the state.

Page 25, Mammals map: "Wolferine" should be "Wolverine."

Page 33, paragraph 1: Anchor Point could be listed along with other Kenai Peninsula communities.

Page 33, paragraph 4: Halibut Cove could be mentioned as a community across Kachemak Bay from Homer.

Page 45, paragraph 5: This and following paragraphs present a good discussion of the NPS's management intent for wildlife research.

Page 47, paragraph 8: Clarification of the NPS's intentions regarding stream clearing, lake fertilization and other fishery rehabilitation techniques could be included in this paragraph.

Page 48, Cultural Resources Management: The State Historic Preservation Office indicates that the NPS is now in the process of conducting a reconnaissance survey in the Resurrection River. This is in line with the management directives on page 49 of the report. They look forward to receiving the results of this season's investigations and results from other work recommended in the management directives. This ongoing research in Kenai Fjords National Park should add significantly to their data base for the southeast side of the Kenai Peninsula.

Page 54, Staffing: To comply with ANILCA Sections 1301(b)(5) and 1308(a), this section should include a description of the NPS's plans for encouraging the hiring of local residents for Kenai Fjords National Park positions.

Page 58, Tidelands...: We would appreciate a more specific assessment of the "important resource values" on Nuka Island and other nearby State lands. Please delineate the land and access characteristics that make these resources important. The NPS should also clarify its management intentions for State and public use of Nuka Island.

The Department of Natural Resources, Division of Forestry through the Kenai Peninsula Area Office of the Southcentral District is preparing to offer for sale a beachlog salvage license for an area adjacent to a portion of the Kenai Fjords National Park shoreline. The Park Superintendent has been contacted and his concerns accommodated in the specifications for the sale, i.e., salvage operations will occur on State owned tidelands and the Northwest Lagoon area has been excluded from the sale area.

Page 66, paragraph 1: "accomplshied" should be "accomplished."

Page 66, Issue: Overnight Facilities: We would appreciate a clarification regarding the NPS intentions for overnight camping facilities at Exit Glacier. Such facilities are not proposed here, however, the concept plan calls for an evaluation of the need for such a facility.

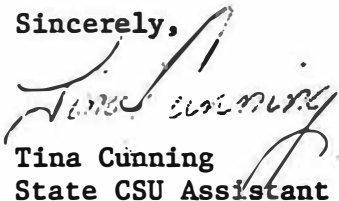
Page 110, Appendix F: Information contained in this appendix should be referenced in the text of the GMP.

Back Pouch, Topography Map: The map should include an arrow indicating north.

State CSU Contacts did not oppose any of the NPS preferred alternatives. Some Contacts recommended, however, that the NPS consider land exchanges to acquire private lands within park boundaries rather than restricting their options to either purchase or cooperative agreement.

In conclusion, we thank the NPS for the opportunity to review this document. We appreciate the cooperation which has been evident in the meetings between the NPS and State CSU Contacts and which is expressed throughout the GMP/EA. If our office can be of further assistance in preparing the final version of this plan, please do not hesitate to call.

Sincerely,



Tina Cuning
State CSU Assistant

cc: L. Parker
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State CSU Contacts
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