

# STATE OF ALASKA

BILL SHEFFIELD, GOVERNOR

CSU Planning Office  
333 Raspberry Road  
Anchorage, AK 99502

Phone: 267-2202

August 30, 1983

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

Dear Mr. Contor:

Thank you for providing the State of Alaska an opportunity to comment on the draft Statement for Management for Cape Krusenstern National Monument. The document was distributed to the State Conservation System Units (CSU) Contacts in each agency. The following comments were received from the Departments of Community and Regional Affairs, Natural Resources, and Fish and Game.

The State CSU Contacts were pleased with the concise discussions of the unit's purposes, existing land uses, potential uses, and management objectives. However, concern was expressed for the lack of detail regarding management intent in the discussions of major issues. We suggest that these discussions be clarified in future revisions of the Statement by including key management constraints or management intent.

Although identified as an issue, possible transportation corridors through the unit were not addressed in the discussions on management objectives. Because access to the Red Dog projects and other mining claims will undoubtedly be an issue, it seems that the inclusion of a discussion on relevant management objectives would be appropriate to provide direction for resolving potential conflict. The National Park Service's (NPS) management objectives regarding RS2477 roads and trails should also be discussed.

The State Historic Preservation Officer (SHPO) looks forward to seeing results of the management objectives for cultural resources. It may be appropriate for your planning staff to coordinate with the SHPO directly by contacting Ty Dilliplane at 276-2653.

On page 12 in the section on commercial fishing, there is mention of a salmon hatchery on the Noatak River. The Alaska Department of Fish and Game (ADF&G) notes that this is presently a pilot hatchery, producing only small numbers of salmon. For further information on their objectives and results, please contact Jim Raymond at 452-1531 in Fairbanks.

The discussion on page 13 under Natural Resources Use vs. Protection implies that ADF&G's continuance of harvest programs for fish and wildlife resources is detrimental to the maintenance of viable wildlife populations. The resources cited include muskoxen and Dall sheep. The ADF&G's management guidelines for Dall sheep in the areas surrounding Cape Krusenstern Monument are restrictive and no legal hunting of muskoxen is presently allowed in the area. Subsistence uses within the monument "shall be permitted" according to the Alaska National Interest Lands Conservation Act (ANILCA) Section 201(3), provided that the continued viability of the population is assured (ANILCA Section 816(b)). Based on these management guidelines and legal mandates, the discussion appears to be inaccurate.

The Public Information section on page 15 includes a discussion of "cooperative arrangements." Any discussions of cooperative lands and resource management in the planning process should include the potential role of coastal management, in this case the NANA Coastal Resource Service Area district program. This regional effort could enhance cooperative management in the area. It would also be beneficial to reference existing cooperative agreements such as the National Park Service/Alaska Department of Fish and Game Master Memorandum of Understanding.

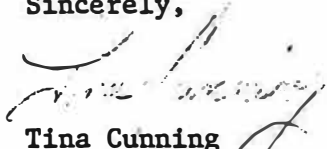
The discussion of facilities on page 22 should also recognize the administrative mandate of ANILCA Section 1306(a), requiring that administrative sites and visitor facilities be located on Native lands in the vicinity of the unit "to the extent practicable and desirable." An important management objective which is missing in this discussion would be to provide the Native landowners an opportunity to provide these facilities.

Planning for the Cape Krusenstern unit will soon involve preparation of a general management plan with management objectives established by the Statement for Management. Although the Statement does not address the Alaska Coastal Management Program, the general management plan must include a Coastal Consistency Determination to fulfill the requirements of the Federal Coastal Management Act of 1972. If you desire further information, please contact Wendy Wolf at 465-3562 in Juneau.

August 30, 1983

We hope that these comments assist your efforts in the planning for the Cape Krusenstern unit. Thank you again for the opportunity to review the draft Statement for Management. Please do not hesitate to contact us if we can be of further assistance in your future planning efforts.

Sincerely,



Tina Cuning  
State CSU Assistant

cc: C. Shaver, NPS  
L. Parker  
R. Foster  
State CSU Contacts  
D. Kelso, DF&G