

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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August 29, 1988

Mr. Boyd Evison
Regional Director
National Park Service
2525 Gambell Street
Anchorage, Alaska 99503-2892

Dear Mr. Evison:

The State of Alaska has reviewed the National Park Service (NPS) draft Environmental Impact Statement (EIS)/Wilderness Recommendation for Glacier Bay National Park and Preserve. The following letter is submitted on behalf of state agencies and represents a consolidation of state concerns and comments. The state's comments are presented in four sections as follows: Introduction; Wilderness Recommendation; General EIS Comments; and Page-specific Comments.

INTRODUCTION

The State of Alaska recognizes that Wilderness has a legitimate place in the range of public land use classifications which exist in Alaska. However, the state believes that a portion of the NPS Wilderness recommendation contained in this EIS is inappropriate. The state has used the following criteria to review the Wilderness recommendations and suggest modifications. Given the NPS's familiarity with these areas, we also urge the NPS to carefully review its draft recommendations to determine whether any lands included in its proposed actions fall within the categories described below. If NPS finds that certain recommended lands do fall in within one or more of these categories, the state requests that NPS either 1) explicitly identify them in the final EIS and provide compelling reasons for recommending them or 2) delete them from the proposed action(s).

Criteria

1. Areas where Wilderness designation would eliminate, reduce or restrict existing uses, structures or activities that are allowed by the Alaska National Interest Lands Conservation Act (ANILCA) and are not degrading resource values;
2. Areas where there is a current or foreseeable interest in or need for:

- a) NPS visitor facilities or recreational development (e.g., visitor centers, campgrounds, trails, lodges, public use cabins);
 - b) developed access (e.g., roads, airstrips, docks, helicopter landing sites);
 - c) state or federal administrative/management facilities (e.g., ranger stations, air/water quality monitoring stations, research facilities);
 - d) utility corridors or facilities (e.g., pipelines, power transmission lines, remote communications equipment);
3. Areas with valid and/or patented mining claims;
 4. Areas that have reasonable potential for inclusion in land exchanges or where park boundaries are in dispute;
 5. Areas where cabins or other structures are used for commercial (e.g., guiding or commercial fishing) or residential purposes;
 6. Areas where mechanized equipment (e.g., chainsaws, generators) has traditionally been used to support commercial, recreational, subsistence, or management activities;
 7. Areas immediately adjacent to roads, mining activity, recreational facilities, land with oil and gas potential or existing leases, or other existing or proposed development;
 8. Areas where off-road vehicles have been traditionally used; and,
 9. Areas immediately adjacent to state lands, navigable waterbodies, submerged lands, tidelands, and possible Revised Statute (RS) 2477 rights-of-way.

In addition, the state requests that the NPS explicitly evaluate its recommendations for conformance with the following September 1986 Department of the Interior (DOI) guidance regarding lands which merit consideration for Wilderness designation:

1. Areas with unique resources or characteristics that may have been overlooked by Congress when it established the Wilderness designations in ANILCA;
2. Areas that, as a result of user trends, land use patterns, and other influences, may have evolved as integral to the Wilderness experience;

3. Adjustments to the boundaries of already designated Wilderness to make boundaries conform more closely to natural features or to facilitate resource management and protection; and,
4. Areas that possess such unique and special qualities that make it appropriate to preclude future NPS management options.

The state is particularly concerned that the Wilderness recommendations meet DOI's first criteria. The exceptional resource values of these park units have already been acknowledged by the creation of the parks. Adding an additional layer of protection to this must be clearly justified. The state requests that NPS explicitly identify the resources and values in each of the areas proposed for Wilderness designation that warrant this added layer of protection.

THE GLACIER BAY NATIONAL PARK AND PRESERVE WILDERNESS
RECOMMENDATION

The state is appreciative of the substantial effort NPS has invested in working with local user groups to find an appropriate management strategy for Glacier Bay's wilderness waters. We recognize that NPS' proposed action represents an attempt to accommodate diverse interest groups and that no solution will be entirely satisfactory to any one interest.

The state offers the following new alternative with the same objective in mind. We support deletion of certain wilderness waters, designation of a limited acreage of new wilderness waters, closure of certain wilderness waters to motorized vessels and aircraft landings, and seasonal restrictions on commercial fishing activity and motorized vessel use in a limited number of areas. The state's preferred alternative is described below:

* The State of Alaska does not waive or otherwise concede its claims of ownership to the submerged lands in the territorial waters adjacent to Glacier Bay. See *United States v. California*, 436 U.S. 32 (1978) (California has dominion over submerged lands surrounding Channel Islands National Monument established by Presidential Proclamation): cf. *Utah Division of State Lands v. United States*, 107 S. Ct. n 2318 (1987) (Title to submerged lands passes to state upon admission to Union).

WATERS:Areas to be retained as existing wilderness

Adams Inlet (starting 2 miles East of the inlet entrance)

Areas to be deleted from existing wilderness

Beardslee Islands
Adams Entrance
Rendu Inlet
Hugh Miller Inlet
Dundas Bay
Charpentier Inlet
Skidmore Bay

Added wilderness

Muir Inlet above Sealers Island
Wachusett Inlet (starting 3 miles west of the inlet entrance)

LANDS:

The state does not support designation of any additional Glacier Bay lands as wilderness.

Rationale:

Commercial fishing has been occurring in Glacier Bay waters since before the Glacier Bay National Monument was established in 1925. To date, there is no evidence that this activity is harming local resources, and no evidence to this effect is presented in the EIS. Given this, the state supports NPS efforts to delete water areas used for commercial fishing from wilderness.

NPS' proposed action recommends deletion of the Beardslee Islands, Adams Entrance, Rendu Inlet, High Miller Inlet, and Dundas Bay Narrows. The state believes three additional areas should be excluded: the remainder of Dundas Bay, Charpentier Inlet, and Skidmore Bay. Dundas Bay is an important area for commercial crabbing. As the NPS notes in its Commercial Fishing in Glacier Bay National Park (1987), 452 crab pots were counted in Dundas in July 1987. This represents a substantial crabbing effort. In addition, the state supports deletion of Charpentier Inlet and Skidmore Bay. These areas are also used for commercial fishing.

The state recognizes that Charpentier and Skidmore offer significant opportunities for solitude and primitive recreation (e.g., kayaking). The state suggests that NPS consider

implementing seasonal closures on motorized vessel use and aircraft landings in these areas during the summer months. Most commercial fishing occurs during the winter.

The state would also support motorized access closures for Wachusett Inlet and Muir Inlet above Sealers Island. Closure of these areas would provide significant opportunities for solitude and primitive recreation.

The state does not support designation as wilderness of Deception Hills east of Doame River, the two parcels adjacent to Gateway Knob, the island adjacent to Blue Mouse Cove, and Cenotaph Island. Approximately 81% of Glacier Bay National Park and Preserve is already in wilderness status. We do not see the need for adding additional land-based wilderness areas. In addition, we are concerned that, overtime, wilderness designation may lead to restrictions on traditional activities (e.g., use of aircraft), which the state would not support.

Recommendation:

The state requests that the wilderness boundary in the Deception Hills area be moved to the western edge of the Grand Plateau Glacier.

Rationale:

- 1) Section 103(b) of ANILCA states Congressional intent that "wherever possible boundaries shall follow hydrographic divides or embrace other topographic features." The NPS took advantage of the opportunity provided by Section 1317 of ANILCA and included recommended Wilderness boundary adjustments in its Wilderness EIS for the Wrangell-St. Elias National Park and Preserve. The state supports this approach and requests that revisions to the Glacier Bay boundary be recommended in this EIS.
- 2) The boundary in the Deception Hills area northward to the outlet of Alsek Lake is nearly impossible to locate in the field. Consistent with our previous recommendations to the NPS during GMP preparation, we recommend the wilderness boundary (and eventually the Park boundary) be moved to the western edge of the Grand Plateau Glacier. It is our understanding that the NPS management in this area would be simplified by this change. This would also simplify continued use of the area by local citizens who currently have difficulty in identifying the boundary.

Considerable local boating and aircraft activity is conducted on the Alsek River and Lake. The river and lake are navigable for a long way into the park. We believe it

would help NPS management if a portion of the wilderness boundary on the lake shore were deleted. This would reduce conflicts between continued uses of the area and perceived management needs.

GENERAL EIS COMMENTS

- 1) The document does not adequately justify NPS Wilderness recommendations, i.e., why certain lands are recommended for Wilderness designation and others are not. It is not clear how NPS determined which suitable parklands should be recommended for designation. The state recommends that the NPS add a new section to the final EIS which describes the criteria NPS used to develop Wilderness recommendations and identifies the specific resources and values it is seeking to protect.

This is particularly important in the case of proposed actions. We note that the U.S. Fish and Wildlife Service, a sister agency in the Department of Interior, includes in its Comprehensive Conservation Plans a chapter titled "Evaluation of Alternatives" which presents evaluation criteria, compares alternatives, assesses the relative costs of each alternative, and explains why the preferred alternative was chosen. (See draft Arctic National Wildlife Refuge CCP/EIS, pages 384-399.) We request that the final EIS contain such an evaluation.

Because Wilderness limits management options, opportunities for development, and certain public uses of parklands, the state cannot support the designation of additional Wilderness unless a compelling reason exists for such designation. The state urges the NPS to include additional rationale for its Wilderness recommendations in the final EIS.

- 2) The document does not adequately describe the differences between management of Wilderness and non-wilderness parklands. Because these differences are not clearly delineated, the public cannot fully assess the impacts of Wilderness designation. As we have urged in the past (see November 24, 1986, correspondence), the state recommends that the NPS include in each document a table which lists activities, structures, and uses which are affected by Wilderness designation. The table included in the Alaska Land Use Council's Draft Wilderness Review Guide (1987) could be used as a basis for this list. The state suggests that the following items, among others, be included in the list: 1) visitor centers, public use cabins, and campgrounds; 2) roads, airstrips, utility corridors, and docks; 3) guide cabins and camps; 4) use of chainsaws and generators; 5) use

of off-road vehicles and helicopters; 6) use of inholdings and adjacent lands; 7) commercial fishing; and 8) use of temporary facilities.

The state notes that there are many activities, uses and structures which NPS may manage more restrictively in Wilderness than in non-Wilderness parklands, even though there are no laws or regulations which specifically mandate increased restrictiveness for these uses. (See Lake Clark EIS, page 47, paragraph 1.) The state therefore requests that NPS more clearly describe how Wilderness designation will affect NPS management philosophy and policies. The state is particularly interested in how Wilderness designation will affect NPS discretionary decisions, e.g., issuance of special use permits and the conditions attached to these permits.

As an example, the NPS considers development of a 30-room lodge on the Harding Icefield in the Kenai Fjords NP to be a "reasonably foreseeable action" if no adjacent lands are designated as Wilderness. If adjacent lands are designated as Wilderness, the NPS indicates that a 20-room lodge is a "reasonably foreseeable action." The state is not aware of any laws or regulations which specifically address lodge size; however, NPS appears to have a management preference for smaller developments on lands adjacent to Wilderness areas. The state believes it would be useful for the public to better understand the effect of Wilderness designation on discretionary NPS administrative decisions.

- 3) Each of the EISs (page 7) notes that the validity of RS 2477 rights-of-way and the navigability of rivers (as it relates to state ownership) will be determined on a case by case basis, and that navigable rivers and valid RS 2477 rights-of-way would not be designated as Wilderness. This statement should be expanded to explain how navigability determinations and RS 2477 validity determinations will be addressed **after** Congress has acted on these Wilderness recommendations. Specifically, the state requests that the intent of this paragraph be clarified with the following insert at the end of the last sentence: "even if the navigability or validity determination is made after the surrounding area has been designated as Wilderness." Further, we request that this intent be included in any Wilderness legislation forwarded to Congress by the NPS.
- 4) The EIS does not adequately stress that the development and use scenarios presented for each alternative are speculative. Since these scenarios provide the basis for assessing the impacts of Wilderness designation and may affect public opinion regarding the merits of designating Wilderness, the

EIS should repeatedly stress that the scenarios represent the NPS's best guess at future needs and developments. Actual developments and associated impacts may be much greater or less than described. The state suggests that the NPS remind readers at the conclusion of each impact analysis that the scenarios and impacts analyses are hypothetical. The state further suggests that the EIS clarify that some of the developments contained in the scenarios are not consistent with the adopted General Management Plan (GMP) and would, therefore, not currently receive approval from the NPS.

- 5) The EIS does not adequately describe the relationship between the management directions established in the GMP for this unit and the Wilderness recommendations. The state requests that the final EIS discuss this relationship. In particular, the GMPs generally indicate that NPS intends to maintain options for future visitor-related development. The EIS should clearly discuss how this objective is affected by the Wilderness recommendations. The state requests that where Wilderness will preclude opportunities for future visitor developments, the EIS identify alternative development sites; provide clear rationale for proceeding with the recommendation; or exclude the area(s) from the Wilderness recommendation.
- 6) The EIS (page 7) states that "helicopter landings are not permitted in Wilderness except when necessary for administrative purposes such as search and rescue activities, NPS research for management purposes, fire management". The state requests that the EIS clearly indicate that state agencies with management and research responsibilities within park units (e.g., the Alaska Departments of Fish and Game, Public Safety, Natural Resources, and Environmental Conservation) may also land helicopters in designated Wilderness when necessary.
- 7) The maps included in the EIS are not adequate for finding landmarks addressed in the respective texts. The state requests that at least one map be included in each EIS showing pertinent features that are referenced in the text. Further, we strongly urge that the final documents be accompanied by more detailed inset maps showing the proposed new boundaries in greater detail.
- 8) Each EIS presents tables depicting estimated subsistence resource harvest levels. The headings for these tables are inadequate for explaining their content and could be problematic if the tables are taken out of context. The EIS indicate that the subsistence harvest levels depicted in these tables are "very rough estimates extrapolated from a

variety of sources listed in the bibliography." We recommend further discussions of how these figures were developed and their margin of error. The Alaska Department of Fish and Game, Division of Subsistence technical reports are among the sources cited, but it appears that considerable guess work was also used. While we appreciate the effort to estimate subsistence harvest levels in the park units, we believe a more detailed explanation is necessary to assure proper use of this information in the future. If additional explanatory material cannot be added to the text, we recommend deletion of these figures to avoid basing decisions on potentially invalid or poor information. This is especially important since this information may be used for decision-making in other contexts.

- 9) The term "subsisters" should be deleted wherever it occurs in the EIS and replaced with "local rural residents" or similar language. Similarly, references to "commercial hunting" should also be replaced with "guided hunting" or "hunting guide camps". There is no "commercial hunting" in Alaska because wildlife cannot be sold.
- 10) The state objects to the proposed NPS requirement that subsistence users obtain a permit for use of chainsaws in designated Wilderness and non-wilderness areas. The state believes this requirement imposes an unnecessary regulatory burden on local rural residents. The cutting of wood for heating, temporary shelters, and materials for trapping has gone on for decades. In addition, the state notes that the U.S. Fish and Wildlife Service, a sister agency of the NPS, allows subsistence use of chainsaws without a permit in Wilderness and non-wilderness areas.

The state also disagrees with NPS's determination that use of motors (e.g., generators) is prohibited in Wilderness areas in Alaska. As stated in each EIS, ANILCA modifies implementation of the Wilderness Act in Alaska. Numerous sections of ANILCA (e.g., Section 1315) permit uses in Alaska Wilderness that are not permitted in Wilderness areas in the lower 48 states. The state believes that Section 1316 of ANILCA, which provides for the use of "temporary facilities and equipment," authorizes use of motorized equipment in Alaska Wilderness areas if directly and necessarily related to the taking of fish and wildlife. The state supports a policy of allowing limited use of motorized equipment in support of traditional activities (e.g., guiding and subsistence) where it would not significantly detract from Wilderness values.

- 11) The state is uncomfortable with Wilderness recommendations immediately adjacent to state lands. To date, there has

been little indication that an NPS Wilderness designation could be used to restrict development activities on adjacent state lands. However, in the long-term, there are no assurances that legal and/or political pressures will not change this situation. For this reason, the state requests that all the EIS, and any subsequent proposed legislation, contain a statement of intent that the designation of Wilderness will not affect the use and development of adjacent non-federal land.

- 12) The ANILCA Section 810 evaluation contained in the EIS lacking in the specificity needed to facilitate an assessment of the potential effects of the proposed action on subsistence uses. (See page-specific comments.) Our major concerns regarding the 810 evaluation are 1) contrary to what is suggested in the plans, subsistence use "patterns" are not depicted; only harvest estimates are provided and their accuracy is questionable; 2) because subsistence use patterns of the unit and adjoining areas by resident zone communities are not described, the EIS fails to sufficiently evaluate the potential effects on subsistence uses of either the proposed action or other alternatives.

The state recommends that the final EIS include a more thorough discussion of how the proposed Wilderness areas are and have been used for subsistence purposes by local rural residents and communities. This discussion should include, but not necessarily be limited to, months of harvest activities; resources harvested; modes of access for specific activities; and additional material on how harvest data were developed.

- 13) Without adequate justification, the EISs consistently predict degradation of wilderness values if parklands are not designated as Wilderness. The Environmental Consequences section of each EIS includes the following conclusion for the No-action Alternative:

Over the long term this alternative would result in deterioration of Wilderness character, reduction of Wilderness size, and destruction of some Wilderness values that would be irreplaceable. A large part of the study area would become semi-wilderness, and some non-wilderness in character.

This conclusion is not supported by the development scenarios contained in the EISs. In many cases, the differences between the scenarios are negligible (e.g., development of a seasonal ranger station, an interpretative sign, or a primitive campground). The state requests that

NPS revise its conclusions to be consistent with the anticipated effects of each development scenario. Conclusions which are not supported by the scenarios are purely speculative and should be deleted from these EISs. The state further requests that NPS substantiate statements made throughout each EIS regarding the added resource protection Wilderness provides.

- 14) Several of the EISs imply that Wilderness designation would reduce airplane overflights and landings and recreational visits. (See Noatak EIS, page 17, Column 1.) The state objects to this characterization. The Wilderness Act, as amended by ANILCA in Alaska, does not place restrictions on the use of aircraft or the number of people who can visit a particular park. We request that this inference be deleted from the documents.

In addition, each EIS contains the following statement which we believe needs clarification: "Policy over the long term will vary on decisions about such things as road locations and mileage, landing sites, extent and location of facilities, and degree of controls applied to activities such as vehicle use, open and closed areas of use, and physical developments." Although we appreciate NPS' attempt to describe some of the less tangible differences between Wilderness and non-wilderness management, we believe this statement requires further elaboration. Title XI provides a procedure for "road locations and mileage" to be reviewed and approved irrespective of Wilderness designation. In addition, Title XI and NPS regulations guarantee that certain modes of access will be allowed by NPS, subject to reasonable regulation. These regulations must be based on findings of actual impact to park resources. Wilderness designation in and of itself should not result in controls being applied to "activities such as vehicle use" and "open and closed areas of use."

- 15) The EISs consistently dismiss many of the issues raised during the "scoping" meetings for these EISs. We suggest that, prior to preparation of the final EISs, NPS again review the issues raised by the public. Many of these issues are of significant concern to Alaskans, and we believe additional response to them is appropriate.

PAGE-SPECIFIC COMMENTS

Page 10. The state disagrees with the NPS that tide and submerged lands in Glacier Bay, including Alsek Lake and Alsek River, are owned by the NPS. We request that the EIS acknowledge this disagreement.

Page 15. The state strongly objects to the presentation in the EIS of NPS's proposal to close all wilderness waters to motorized vessel use. This proposal is included in each alternative and is treated as a given. The reader is left with the impression that there is no need to comment on this aspect of each alternative. NPS has not done an adequate job of soliciting public input on this proposal as is required by the National Environmental Policy Act.

Furthermore, NPS has gone beyond the intent of Congress in proposing that all wilderness waters be closed to motorized vessel use. As accurately stated on page 15, "...the Senate Committee intended that some waters be managed for non-motorized recreation (Senate Report 96-413, p. 217)." (Emphasis added.)

Page 19. At this time, the state would not support development of a campground in the Gateway Knob area. There are other areas more suitable for a developed campground which would leave this area to picnickings and camping.

Page 19-23. The state opposes designation of additional wilderness in the Deception Hills and mouth of Alsek Lake area. We do not support any further wilderness in the preserve and in the Alsek River and Lake area. (See previous comments.)

Page 47. The final EIS should clarify whether "other recreational visits" include activities such as hunting for moose, bear, mountain goats, and waterfowl, trapping for furbearers, and sportfishing.

Page 49. The last sentence is out of context and potentially misleading. "It (ANILCA) also specifies that the disposition and use of cabins must be compatible with the purposes for which the preserve was established, "to protect a segment of the Alsek River, fish and wildlife habitats, and their migration routes" The purpose for which all preserves were established was to allow continued sport hunting. That is the only difference between park and preserve. The phrase quoted in the EIS is from ANILCA Section 202(1) and in context reads: "The monument addition and preserve shall be managed for the following purposes, among others: To protect"

Page 51. The fourth paragraph of this section suggests that only minor use is made of this park unit for subsistence purposes. A more accurate appraisal would at least summarize available information on traditional and recent historic uses of the park unit, as well as the reasons for the lower use levels today. This paragraph also under-

estimates the level of use of the park unit; even if only moderate use occurs, this is not an adequate indicator of its importance to area residents.

Pages 51-52, Subsistence Uses. The draft EIS presents only a limited selection of the available data on subsistence uses of preserve lands and waters by Yakutat residents. Data on the recent and continued use of Glacier Bay lands and waters by residents of Elfin Cove, Gustavus, Hoonah, Pelican, and Yakutat can be found in the following reports. We suggest that the NPS review these reports and incorporate pertinent information.

Frederica de Laguna, 1972. "Under Mount Saint Elias: The History and Culture of the Yakutat Tlingit." Smithsonian Contributions to Anthropology, No. 7. Washington, DC.

Stephen A. McNeary, 1978. "Local Exploitation of D-2 Lands in the Gulf of Alaska Region." University of Alaska, Cooperative Park Studies Unit, Occasional Paper No. 16.

George Gmelch, 1982. Resource Use in Glacier Bay National Preserve. National Park Service, Division of Cultural Resources.

George Gmelch, 1988. "Two Rivers, Two Cultures." Natural History 97(5):52-63.

Additionally, the DFG/Division of Subsistence has collected land use and harvest data for the communities of Hoonah, Elfin Cove, Gustavus, and Pelican, and further harvest data for Yakutat. This information is not yet in published form, but should be noted for future reference since areas within the Glacier Bay unit are utilized by these communities. For further information on the availability of data for these communities, the NPS should contact Rob Bosworth or Bob Schroeder at 465-2629.

Page 52, Table 11. Table 11 on page 52 and repeated on page 103 contains subsistence harvest figures attributed, in part, to the DFG. The specific source is not cited. Actual harvest figures for Yakutat which appear in the DFG 1986d report listed in the bibliography are considerably higher than those presented. The figure depicted in the draft EIS also may not reflect harvest levels for communities other than Yakutat and, therefore, are of limited utility in evaluating regional subsistence harvest levels. Similarly, the EIS should explain how the preserve portion harvest estimates were derived so that their accuracy can be evaluated. The present discussion is inadequate and of little utility to the reviewer.

We believe it is important to note that the main areas of the Glacier Bay National Park used for subsistence purposes by the residents of Hoonah, Gustavus, Elfin Cove, and Pelican were included in the park in 1939, when the park boundaries were expanded. Until the late 1960s, the NPS did not significantly restrict subsistence hunting, fishing, and gathering, and either paid little attention to subsistence harvesting or instituted harvest monitoring programs. For example, during the 1950s and 1960s, the NPS issued permits to Hoonah residents for seal hunting in park waters. Such harvesting no longer is allowed, despite it being a documented traditional activity formerly authorized by the NPS.

Uses of this park unit by residents of Hoonah are not addressed in the EIS. Subsistence salmon fishing with nets occurs in Excursion Inlet and often extends into park waters; fish removed from commercial catches and fish taken under sport regulations continue to be used for subsistence purposes. Some berries and plants are taken after the close of the tourist season in late August and early September.

Page 53, Subsistence Map. Sources consulted in preparing this map should be cited. The map contains no information on uses of the park unit for salmon fishing by communities other than Yakutat and therefore may be incomplete. The map may be misleading if park unit areas used for subsistence activities other than salmon fishing are more extensive than those depicted. Although we appreciate the presentation of subsistence use area maps for "indicator species" in the draft EISs, we are concerned that they not be interpreted as depicting the only or most extensive areas utilized for subsistence purposes.

Page 59, paragraph 2. We recommend that the final EIS provide percentage figures of lands and waters included and excluded from wilderness.

Page 61, last paragraph. We are concerned that the EIS has misconstrued gray whale research data. For example, the following sentence is inaccurate. "However, in a 1984 study by Malme, it was determined that gray whales would display active surface movements away from a drill ship that was closer than 1 kilometer . . .". The report states that "playbacks" of drill ship noise were used, rather than a drill ship itself. The report also states "The results are inconclusive . . ." on page 7-64. On page 9-5, it states "The behavioral observations . . . suggest that only the loudest and most raucous industrial noises have an observable effect on migrating gray whales." It should be

further noted that the discussion on humpbacks in this section does not recognize the scientific community's assessment that humpbacks are more resistant to human activities, than implied here.

We also suggest that the Malme study be listed in the bibliography and note that the study was conducted in 1982-83, not 1984.

Page 62. The 1983 study on moose and wolves is not listed in the bibliography. In addition, reported results appear to be incorrectly applied to activities and areas not assessed in the original study. Furthermore, we believe that the impacts of camping and recreational activities on wolves and moose in the Alsek Lake, River, and shoreline areas are overestimated. We believe these activities will not significantly affect the use of the area as a migration corridor or wildlife behavior. However, there may be increased human/bear interactions which are not addressed.

Page 63. The state requests that NPS clarify several statements made in the "Impact on Harbor Seals" section. For example, we suggest modification of "Motorized vessel use of the areas in which harbor seals are found may cause changes in the seals' use pattern of those areas." This sentence should be modified to "may cause transient changes . . ." to more accurately reflect study results. The statement "seal pup survival is reduced whenever their mothers leave the pups to seek underwater shelter . . ." is incomplete. The literature indicates that separation becomes less significant after a bond is established during the first hours following birth.

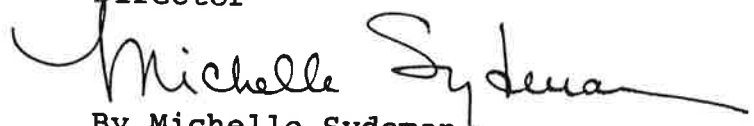
Page 64. To improve the quality of marine mammal information, we encourage the authors of the EIS to review "Selected Marine Mammals of Alaska: Species Accounts with Research and Management Recommendations" by the Marine Mammal Commission, Jack W. Lentfer, Editor, 1988 (publication number PB88-178462 available from National Technical Information Service, 5285 Port Royal Road, Springfield, VA 22616).

Page 98. The EIS has eliminated consideration of reasonable alternatives by determining not to address wilderness waters that allow continued motorized vessel use (e.g. floatplanes, skiffs, commercial fishing boats, tour vessels, etc.). We believe the final EIS should present a range of alternatives which includes motorized access in wilderness waters. (See State of Alaska preferred alternative.)

On behalf of the State of Alaska, thank you for the opportunity to review this draft EIS. If we can be of assistance in clarifying the state's comments, please do not hesitate to call this office.

Sincerely,

Robert L. Grogan
Director


By Michelle Sydeman
CSU Coordinator

cc: Commissioner Judy Brady, DNR
Commissioner Don Collinsworth, DFG
Commissioner Dennis Kelso, DEC
Commissioner Mark Hickey, DOT/PF
Commissioner Tony Smith, DCED
Mr. Rod Swope, Office of the Governor
Mr. John Katz, Office of the Governor
Alaska Land Use Council Members
Land Use Advisors Committee Members

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UNITED STATES OF AMERICA
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

PUBLIC HEARING ON
DRAFT ENVIRONMENTAL IMPACT STATEMENTS
FOR
WILDERNESS DESIGNATIONS
AND
SUBSISTENCE, SECTION 810, ANALYSES
FOR

ANIACHAK NATIONAL MONUMENT AND PRESERVE
CAPE KRUSENSTERN NATIONAL MONUMENT
DENALI NATIONAL PARK AND PRESERVE
GLACIER BAY NATIONAL PARK AND PRESERVE
KATMAI NATIONAL PARK AND PRESERVE
KOBUK VALLEY NATIONAL PARK
NOATAK NATIONAL PRESERVE

National Park Service
2525 Gambell Street, Suite 300
Anchorage, Alaska
July 18, 1988
7:00 o'clock P.M.

Hearing Officer:

MR. JACK ALLEN
Regional Solicitor
Department of Interior

1 not be able to -- what's the word? -- lease or allow a specific
2 land assignment of federal land to a concessionaire for visitor
3 facilities, where we could in the areas that are not wilderness,
4 because it would be a -- if it was -- involved a permanent
5 facility, we could not do that in existing wilderness.

6 MS. MCGUIRE: And what about subsistence hunting?

7 MR. MOSBY: It would still continue. It's a
8 right, the opportunity is there by law.

9 MR. BEAL: Yeah, where subsistence hunting is
10 allowed now

11 MR. MOSBY: Where it is allowed.

12 MR. BEAL: it would continue, and the same
13 thing with sport hunting. Where sport hunting is allowed now
14 in national preserve units, that would also be allowed if those
15 lands were designated wilderness.

16 MS. MCGUIRE: That was my question about the float
17 plane or access. If there is access now, becoming a wilderness
18 area does not -- I've read what you've said, but I just wanted to
19 hear it I guess.

20 MR. BEAL: The special access provisions of
21 ANILCA

22 MS. MCGUIRE: Are allowed in

23 MR. BEAL: for park lands that allow for the
24 use of snow machines, motor boats and airplanes are also applied
25 -- also applied to wilderness lands.

1 MR. BANE: I might just -- if I might complicate
2 the -- that answer a little bit. You're in- -- particularly
3 interested in Katmai?

4 MS. MCGUIRE: Um-hm. 

5 MR. BANE: What he said was true, except that in
6 the old monument boundaries snow machines -- I think it's
7 appropriate -- or ATVs, things of that type are -- snow machines
8 in particular, I don't think are permitted in the old park unit,
9 are they?

10 MR. BEAL: I don't know. I'll have to look into
11 that more.

12 MR. BANE: Yeah. ATVs are certainly not -- are
13 not allowed.

14 MR. MOSBY: ATVs for sure -- yeah, they're not

15 UNIDENTIFIED: For any of the park units?

16 MR. BEAL: Correct. ATVs are not allowed in any
17 of the park units.

18 MR. BANE: But subsistence is not -- there is no
19 subsistence in Katmai National Park. There is in the preserve,
20 but not in the park.

21 UNIDENTIFIED: What's the bias against helicopters?

22 MR. ALLEN: For what purposes?

23 UNIDENTIFIED: Well, they're not allowed at all in
24 any of the preserves or parks. Unless it's something -- a special
25 permit by the National Park Service.

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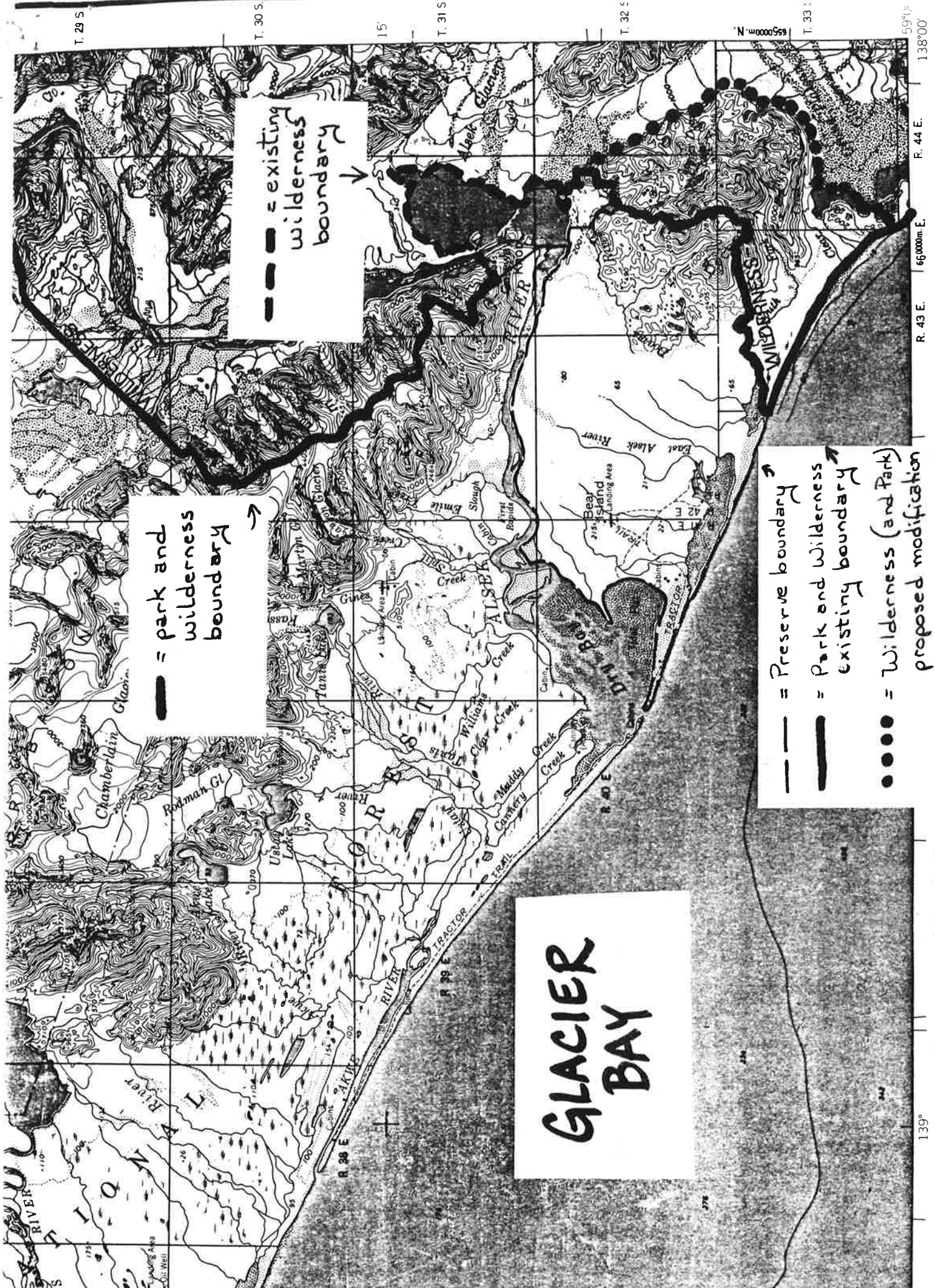
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GLACIER BAY

— = park and wilderness boundary

- - - = existing wilderness boundary

— = Preserve boundary

— = Park and Wilderness existing boundary

● = Wilderness (and Park) proposed modification