

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 the Katmai 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 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 KATMAI NATIONAL PARK AND PRESERVE WILDERNESS RECOMMENDATION:

Recommendation:

The state requests deletion of Battle and Kulik Lakes, Lake Colville, the northern portion of Nakuek Lake, and Naknek Lake's North Arm and Iliuk Arm from the Katmai Wilderness proposal.

Rationale:

- 1) The state asserts that these water bodies are navigable and, therefore, the state owns and has management authority over the submerged lands (shorelands) and the watercolumns above them. Designation of these waters as Wilderness would be inappropriate. In addition, designation of adjacent uplands as Wilderness could increase the potential for state/federal management conflicts.

Recommendation:

Delete the proposed wilderness addition between Naknek Lake and the existing northwest park boundary. (See #1 on attached map.)

Rationale:

- 1) This area is heavily used by residents of nearby King Salmon. One sign of this use is the presence of hunting/trapping cabins which are referenced on page 14 of the EIS. In addition, there are numerous access trails through the area.

- 2) This area contains an 11-acre private tract. The EIS (page 19) states that future use of this tract is unknown at this time.
- 3) A major access route, Pike Ridge Trail, crisscrosses the existing park and proposed Wilderness boundary. The trail and connecting road has historically been used by motorized vehicles, including highway vehicles and ORV's, estimated at 200-400 trips per year. The trail is used to access non-park areas to the north for hunting, fishing, and other activities. The trail area should be excluded from Wilderness designation (and probably should be considered for removal from park status) to ensure these uses can continue, and to minimize management conflicts. Use levels alone make the area undesirable for Wilderness.

Recommendation:

The state opposes designation of 2,605 acres at Geographic Harbor and 3,370 acres on the southeast side of Kukak Bay as Wilderness. Furthermore, were the NPS to acquire the three small parcels of privately-owned land along the Pacific Coast at Katmai Bay, Kukak, and Kaguyak, the state recommends that they remain in non-Wilderness status.

Rationale:

- 1) Each spring, the Alaska Department of Fish and Game (DFG) uses a cabin at Geographic Harbor as a staging area for fisheries studies. These studies typically require use of a helicopter and several biologists. To avoid any possible conflicts with Wilderness management, the state opposes inclusion of this area in the Katmai Wilderness.
- 2) Kukak Bay is used by commercial fishermen harvesting salmon, herring, crab, and clams. As noted in the EIS, the remains of a clam cannery are still standing in the area proposed for Wilderness designation. The state believes it may be advantageous to leave this area in non-Wilderness status to provide for uses incidental to commercial fishing activity. (e.g., shore-based temporary facilities.)
- 3) In addition, the five sites being proposed for Wilderness designation along the Pacific Coast are the only coastal (e.g., shore-based temporary facilities). areas in Katmai where visitor facilities could be built in the future, if deemed desirable and appropriate. The state believes opportunities for future visitor development in these areas should be maintained.

Recommendation:

The state requests deletion of the area just north of Battle Lake and the divide between the park and preserve from the Katmai Wilderness proposal.

Rationale:

- 1) A 60-acre mining claim group, which contains three unpatented lode claims, is located in this area. Wilderness designation would likely make development of these claims more difficult.
- 2) There are two private lodges in this vicinity (Battle Lake Camp and Kulik Lodge). Expansion of these facilities in the future may be seen as inconsistent with Wilderness management.

Recommendation:

Modify the existing Wilderness boundary that stairsteps from King Salmon Creek's headwaters to Naknek Lake to follow hydrographic and topographic features. (See #2 on attached map.)

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 Katmai boundary be recommended in this EIS.

Recommendation:

Provide assurances that the access provisions of ANILCA Section 1110(a) apply to the entire Katmai National Park and Preserve, regardless of Wilderness status and including the former national monument; or

Delete the existing designated Wilderness between Naknek Lake and Lake Brooks. (See #3 on attached Map.) This deletion would begin at the northernmost peak in T. 19 S., R. 42 W., and run to the largest of the lakes in that township that drains into Lake Brooks. The boundary would then follow the outlet stream to the lake, then along a stream at the east of the lake to the existing

Wilderness boundary along the road corridor. Wherever possible, this proposed boundary follows readily identifiable hydrographic features.

Rationale:

- 1) Naknek Lake and Lake Brooks are navigable waterbodies. They are also used extensively by airplanes, motor boats, snowmachines, and ORVs. Adjacent uplands have also been traditionally and extensively used via mechanized access.

We note that the official hearing record for the Katmai Wilderness EIS (excerpt attached) indicates that Superintendent Ray Bane believes that snowmachines (and apparently other access methods covered by Section 1110(a)) applies to all conservation system units and urges that the final EIS and subsequent Wilderness recommendations to Congress reiterate this important provision.

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 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 (pages 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 that 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 evaluations contained in the EIS are lacking in the specificity needed to facilitate an assessment of the potential effects of the proposed actions on subsistence uses. (See page-specific comments.) Our major concerns regarding the 810 evaluations 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 EISs fail 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, this and other NPS 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 in Alaska 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

Pages 6-7. We request that this section clarify that certain commercial enterprises, such as guiding and outfitting, are allowed in wilderness areas in Alaska. We further suggest that NPS review this entire section to ensure that all of the amendments ANILCA makes to wilderness management in Alaska are referenced.

Pages 11, 17, 21, 27, 33. The state requests that the maps of these pages be revised or footnoted to indicate that the NPS does not have jurisdiction over waters along the eastern park boundary.

Page 14. We suggest that this section cite the importance of Kamishak Bay to brown bears.

Page 16. The ORV route described here is not from Lake Camp, but rather along Pike Ridge. It is used year-round and staff roughly estimate it has 200-400 "use days," far more than the NPS proposed limitation of 24 vehicles.

Page 48. The statement "The area has the largest population of brown/grizzly bears in North America" needs qualification. We suggest revision to "The Katmai National Park and Preserve has more brown bears than any other national park in North America."

The sentence "In 1986 there were about 700 bears for the whole Alaska Peninsula" should be supported with documentation or deleted. The discussion of "coastal" versus "inland" bears implies that these are two different species. There is no such distinction. In addition, the food habits/behavior discussion is not scientifically based.

Page 51. We suggest that the NPS include more recent figures on the value of the salmon catch, which is much higher than \$30 million.

Page 52, Subsistence Use. The existing two-paragraph narrative on page 52 is inadequate to characterize subsistence uses of the preserve area by nearby communities. ANILCA does not

specifically authorize subsistence uses of Katmai National Park, but subsistence salmon fishing has occurred on the Naknek River where it exits Naknek Lake, and local residents have expressed interest in seeing this fishery reopened. (See pages 10 and 52 of the Katmai GMP).

Page 53, Subsistence Map. We recommend the NPS cite sources for this map in the final EIS. The following reference should be consulted for further information on subsistence uses, harvest areas, and harvest levels for several of the target communities: Judith Morris, "Subsistence Production and Exchange in the Iliamna Lake Region, Southwest Alaska, 1982-1983." Alaska Department of Fish and Game (DFG)/Division of Subsistence Technical Paper No. 136. For example, Figure 7 of this report depicts the resource harvest areas for the community of Igiugig during the period 1962-1982. Areas within the preserve are shown on this map but not on the one in the EIS.

Page 54, Table 3. The reference cited in the preceding comment contains harvest data for some of the preserve area communities that can be used to improve the accuracy of the regional harvest data in this table. The final EIS should provide an explanation of how the preserve harvest estimates were developed, to facilitate analysis of them.

Page 55. Paragraph 2 appears to refer only to non-Alaska residents, as we believe many more than 200 people/year travel by boat to Brooks Camp, Bay of Islands and other "interior" parts of Naknek Lake.

In addition, the discussion of access fails to recognize the existence of unmarked, unimproved landing areas.

Page 64 - Paragraph 1. We request that the final EIS clarify what is meant by the following statement: "Not designating additional wilderness in Katmai would maintain the current mix of users."

Page 65. The projected impacts on brown bears appears to be drastically overstated (See also p. 72). If the "study area" is managed according to the GMP and standard NPS policies, even without any new wilderness the state believes there will be nearly the same impact under all of the proposals. The discussion indicates that the proposed alternative would reduce human/bear conflicts from "heavy" (Alt. 1) to "moderate" (Alt. 2). This appears to be unfounded, especially since overall visitation and visitor facilities are identical under the two alternatives.

Pages 66-67, Alternative 1, and pages 73-74, Alternative 2, Impacts on Subsistence Uses. In the absence of further discussion as to how the preserve harvest estimates were developed, we caution the NPS to avoid devaluing the preserve's importance to subsistence activities and the local subsistence economy.

We suspect that fish constitute more than 19 percent of the wild resources harvested for subsistence purposes. For example, 1983 harvest data indicate that freshwater fish and salmon comprised 85 percent by weight of the total harvest in Iguigig, and 87 percent in Kokhanok (See the DFG/Division of Subsistence Technical Paper No. 136 cited above, pages 66-70 and 74-78). The NPS is correct in stipulating that subsistence harvests can vary from year to year for a variety of reasons. A more appropriate way to present harvest data would be to depict a range for each species, since only limited data are available and annual fluctuations are commonplace.

We believe further evaluation of the potential effects of proposed park facilities at the Nonvianuk Lake and Kukaklek Lake outlets on subsistence use is warranted. The information presented in the alternative does not indicate the current extent of use of these preserve areas for subsistence purposes, and does not allow the reader to evaluate whether substantial increases in visitor use might affect subsistence uses. We believe that the EIS should not conclude that subsistence uses would not be measurably impacted because the affected communities have alternative areas available.

Page 79, second full paragraph. The text does not indicate whether off-road-vehicle (ORV) use for fall hunting in the Lake Camp area is by subsistence or recreational hunters or both.

Pages 96-101, ANILCA 810 Evaluation. Changes to Table A-1 should be made on the basis of information presented above. We request further information concerning the NPS finding on page 99 that ORVs are not traditional means of access for subsistence pursuits in the preserve, in light of our previous comment.

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.

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ANCHORAGE, ALASKA 99501

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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- [1266] Ms. Gail Baker, U.S. Fish & Wildlife Service, Anchorage
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- [1037] Ms. Joyce Beelman, Alaska Department of Environmental Conservation, Fairbanks
- [1400] Ms. Mary Bixby, Division of Governmental Coordination, Juneau
- [1490] Mr. Rex Blazer, Land Use Advisors Committee, Fairbanks
- [120] The Honorable Judy Brady, Department of Natural Resources, Juneau
- [1372] Mr. Al Carson, Department of Fish and Game, Anchorage
- [248] The Honorable Don Collinsworth, Department of Fish and Game, Juneau
- [1491] Mr. Steve Colt, Land Use Advisors Committee, Anchorage
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- - - = Pike Ridge trail
 - - - = rest of road out
 of King Salmon
 along Creek that
 merges with Pike
 Ridge Trail →

#1

... = proposed
 wilderness
 adjustment

KATMAI

●●● = proposed wilderness
 boundary
 (Existing wilderness
 boundary follows
 Naknek Lake shore
 to north.)

#2

