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August 5, 1993

Jack Mosby
Klondike Gold Rush Alternatives Comments
National Park Service
2525 Gambell Street
Anchorage, Alaska 99503

Dear Mr. Mosby: *Jack*

The State of Alaska has reviewed the General Management Plan Alternatives for the Klondike Gold Rush National Historical Park. This letter represents the consolidated comments of the State's resource agencies. Given the existing Memorandum of Understanding between the State and the National Park Service concerning the state-owned Chilkoot Trail and Dyea areas, most of our comments focus on this aspect of the alternatives.

Management Options

The State of Alaska favors maximum recreational development and development consistent with appropriate protection of the natural, cultural and historical resources. The tourism industry and the State benefit substantially from recreational use of the Chilkoot Trail and the Dyea Campground on the flats. Because of the limited capacity of the campground and trail camping sites, some controls will be necessary concerning the number of people staying overnight in any one location. However, the State would rather see more emphasis placed on improving facilities to handle more people than establishing limits on use through permits and carrying capacities.

Alternative C assumes that backcountry registration will be required to limit the number of hikers on the trail during the peak visitor period. The State would prefer hardening of trailside camping sites and providing drinking water and latrines

to increase capacity. Since access to the trailhead is limited, and therefore enforceable, the Service could consider charging a use fee. The Service should also consider concession-operated sleeping and eating establishments along the trail. Such facilities would reduce camping impacts, although the delivery of provisions and handling of water and wastewater would create major new impacts that would need to be addressed. Any concession operation should be required to pay for appropriate technology to solve these problems, and there should be no proprietary interest vested after expiration of any concession contract. Similarly, any such contract should be long enough to justify the potentially substantial private investment.

Based on the experience of the State Division of Parks, free campgrounds along the road system compete with local businesses more than a campground with fees. In light of this consideration, and to better serve the public, the State would prefer to see the Dyea campground improved and enlarged with water, latrines, and good site facilities -- with accompanying fees.

The State also recommends that the Service devote a high priority to improved interpretation of the historical resources to provide greater protection, and to offer visitors an improved understanding and appreciation of the area. The interpretive services proposed in Alternative C meet this need.

Natural Resource Information

We presume that the draft General Management Plan will have a more complete description of fish, wildlife, and other non-mining cultural resources of the area. These resources and their uses must be addressed in the plan. For example, the Dyea River is well-known as a sportfishing destination in addition to its historical attributes, yet the Alternatives document includes no mention of this compatible use. Cultural resources include possible historic and prehistoric Indian sites in the area. Inventory work (page 9) should also be expedited to precede development of management plans for the park. The plan should also indicate how fish and wildlife and their uses may be affected, and how impacts will be minimized.

Nelson Slough

Page 21 contains an erroneous statement that the Alaska Department of Fish and Game is closing vehicle crossings of Nelson Slough. Please refer to the attached letter of clarification from DFG to the Skagway City Manager on this subject.

Public Use Restrictions

A statement at the bottom of page 11 discusses the possibility of public use restrictions, such as group size limits. For consistency with other park units in Alaska, any public use restrictions contemplated in the General Management Plan should be pursued under the Alaska National Interest Lands Conservation Act Title XI regulations.

Ivory Ban

While this issue is not addressed in this document, we wish to take this opportunity to remind the Service of the State's opposition to the Service's policy that bans the sale of ivory products from park concessions. We do not believe such a policy is justified since, contrary to Service claims, there is little evidence that protected archaeological sites on federal lands would be damaged in the absence of this policy. We believe such a policy is misdirected and inappropriate.

In closing, State agencies note that the National Park Service has provided an outstanding level of service to the areas covered under the MOU with the State. The State looks forward to continuing a productive working relationship on the land and resource management issues addressed in this letter. Thank you for the opportunity to submit these comments. If you have any questions, please feel free to call this office.

Sincerely,



Sally Gibert
State CSU/Coordinator

cc:

Janet McCabe, Acting Superintendent, Klondike Gold Rush National Historical Park

Harry Noah, Commissioner, Department of Natural Resources

Carl Rosier, Commissioner, Department of Fish and Game

John Sandor, Commissioner, Department of Environmental Conservation

Bruce Campbell, Commissioner, Department of Transportation and Public Facilities

Richard Burton, Commissioner, Department of Public Safety

John Katz, Governor's Office, Washington, D.C.

**CSU Distribution List
GMP-Klondike
August 6, 1993**

Tina Cunning, Department of Fish & Game, Anchorage

Terry Haynes, Department of Fish & Game, Fairbanks

Priscilla Wohl, Department of Environmental Conservation, Anchorage

Alice Iliff, Department of Natural Resources, Anchorage

Jeff Otteson, Department of Transportation/Public Facilities, Juneau

Paul Rusanowski, Division of Governmental Coordination, Juneau

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