

## OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET  
DIVISION OF GOVERNMENTAL COORDINATION

SOUTHCENTRAL REGIONAL OFFICE  
3601 "C" STREET, SUITE 370  
ANCHORAGE, ALASKA 99503-5930  
PH: (907) 269-7470/FAX: (907) 561-6134

CENTRAL OFFICE  
P.O. BOX 110030  
JUNEAU, ALASKA 99811-0030  
PH: (907) 465-3562/FAX: (907) 465-3075

PIPELINE COORDINATOR'S OFFICE  
411 WEST 4TH AVENUE, SUITE 2C  
ANCHORAGE, ALASKA 99501-2343  
PH: (907) 271-4317/FAX: (907) 272-0690

July 1, 1996

Clay Alderson, Superintendent  
Klondike Gold Rush National Historic Park  
P.O. Box 517  
Skagway, AK 99840

Re: Final Draft, Statement for Management

Dear Mr. Alderson:

The State of Alaska has completed review of the above referenced document. This letter represents the consolidated comments of the State resource agencies.

Page 13, MOU between the National Park Service (NPS) and the State: This section states in part that "[t]he state land in the park is managed under a Memorandum of Understanding which allows NPS authority to enforce Code of Federal Regulations, Title 36, on state land within the park". This statement is incorrect and contradicts even NPS' own conflicting statements in the Internal Review Draft General Management Plan and EIS reviewed in January 1996. The Chilkoot Trail corridor and six small parcels, along with some undetermined lands in Dyea, are the only state lands conceivably included in the MOU. The MOU will be amended if the state retains any lands within Dyea Flats after municipal selections are finalized.

Page 14, Municipal Entitlements: In the interest of fostering a continuing relationship necessary for the State of Alaska, City of Skagway, and National Park Service to work productively on this issue, we recommend deleting the second paragraph of this section. This section contains the statement that if the state conveys land to the city, NPS will be "in opposition to the city over ownership of land within the park". The city will eventually receive its full entitlement, and some of it will be in the park. Also, the state has previously requested that NPS postpone planning for these areas until the municipal entitlement process is complete.

Under the “Strategy” for the “Cultural Resource Management” and “Natural Resource Management” sections (pages 17 and 20, respectively), NPS states: “Initiate cooperative agreements with universities to accomplish inventories where possible.” We suggest that the NPS not limit itself to universities for the collection of such data. For example, the state in some instances has expertise and staff available already in Alaska who can collect data efficiently as well as cooperatively with park staff and local residents. We also suggest that the NPS establish a preferred direction in the strategy to approach cooperative efforts with the state and local organizations prior to bringing in data collectors from other states.

Page 21, paragraph 3, replace “boards” with “committees”.

Page 21, “Authority”, add “Master Memorandum of Understanding with the Alaska Department of Fish and Game”.

Page 23, under “Land Status”, in “Discussion” explain what is meant by “at risk”. In the last sentence, perhaps “are protected” should be replaced with language such as “are developed consistent with the historic nature of the park”. The communities’ land selections for community development can be an arena for close cooperation rather than confrontation with NPS if such positive orientation is established in this document.

Page 24, under “Utility Corridors”, the extent of federal regulation applicable to this right-of-way should be clearly delineated. In addition, the discussion should include NPS’s intent regarding the abandoned facilities in the utility corridors.

Page 26, “Employee Housing”, should also include options to aid local landowners in providing the needed facilities through various mechanisms made available under ANILCA Section 1306 instead of the NPS owning and constructing its own facilities.

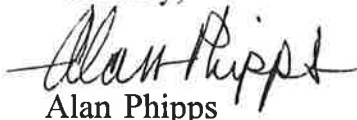
Page 27, first “Strategy”: Correct “other Southeast Alaska NPS coastal parks”, as there is only one in nearby Glacier Bay area. In addition, the reference to management of the Chilkoot Trail neither includes sufficient detail as to provide management direction nor appears to recognize issues which we raised during review of the General Management Plan. We suggest this be carefully considered in depth before preparation of the final document.

Page 27, under “Discussion” we urge that coordination and discussions also include the Alaska Departments of Natural Resources and Fish and Game prior to “establishing and enforcing maximum use limits”.

We also suggest that, prior to publication of the final Statement for Management, the document be edited to spell out the names of referenced organizations rather than using acronyms. This will improve the readability and utility of individual sections.

The State of Alaska resource agencies appreciate the opportunity to provide these comments. If you have any questions please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Alan Phipps". The signature is written in a cursive style with a horizontal line through the middle.

Alan Phipps

Project Review Coordinator

cc: Diane Mayer, Director, DGC  
Frank Rue, Commissioner, DFG  
John Shively, Commissioner, DNR  
Michele Brown, Commissioner, DEC  
Joseph Perkins, Commissioner, DOTPF  
William Hensley, Commissioner, DCED