

STATE OF ALASKA

TONY KNOWLES, GOVERNOR

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 21, 1997

Mr. Robert Barbee
Regional Director
National Park Service
2525 Gambell Street, Room 104
Anchorage, Alaska 99503

Dear Mr. Barbee:

The State of Alaska has reviewed the draft set of Strategic Plans prepared by National Park Service (NPS) for national park units in Alaska. This letter represents the consolidated comments of the State's resource agencies. Due to the short review period at the height of the summer season many state staff were unable to spend adequate time reviewing these important documents. Given more time, we would likely have been able to provide more depth and detail.

To reduce our preparation time, the following comments are mostly cut and paste from agency comments, with only moderate editing for clarity and style. General comments are listed first, followed by park-specific comments. If you have any questions about any aspect, please call.

General Comments

Consistency. The plans as a group are very uneven in providing scope, detail and explanation of goals, even though all cover essentially the same goal categories. Some of this may be a product of park size and the extent of visitor use, but more consistency would be appropriate. Is the Denali Strategic Plan more of what might be expected as a final product, or are the much shorter and to the point plans likely to be the models? The format of the Denali plan is preferable over the others for reasons of depth of coverage, style of presentation, comprehensiveness, and lack of jargon.

Context. The reason and context for these plans is missing. An introduction which includes basic information such as provided in the July 3 news release's first two paragraphs is necessary. To further define the context, we suggest listing the key purposes in Public Law 103-62 (attached). Most plans appear to rely on a numbering system and menu of goals and objectives that are not explained. There is no discussion of the intended audience, anticipated use of the

plans, their relationship to existing plans required by ANILCA, or discussion of public and state participation in preparation and revision of plans for Alaska's park units. With some exceptions, the plans appear to superficially address a legislative requirement by reflecting philosophical goals of current management without reflecting the entire balance of activities that must be protected (and managed) in Alaska park units consistent with ANILCA. It would be highly desirable to see some measurable goals to achieve the latter requirements.

Quantification of Goals. We are aware that plan authors have struggled with this requirement. In some cases it works, e.g. Denali says, "buy all 14 patented Kantishna mining claims by 2002." In other situations, such quantification does not work. We recommend working with Interior officials and Congress, if necessary, to refine this system so that it is more useful and realistic. Stan Leaphart's comments for the Citizens Advisory Commission on Federal Areas contain good examples where quantification is problematic. A few aspects of the problems we noted:

- Wrangells Goal IIa1F. "50% of local populations are Wrangell-St Elias NP supporters." This goal is meaningless unless you know how many people currently support the park. We suspect this baseline information does not exist and would be difficult to obtain.
- How will some of these goals will be measured? For example, Goal Ia12 for Yukon Charley states: "50% of activities occurring on the external boundaries or on private lands in the preserve will be managed to be compatible with the purposes of the preserve." How will this be measured? 50% of the acreage will be managed compatibly? Within what distance? etc. Why try to quantify this?
- Quantification, especially in percentages, will require NPS to develop and many factors to monitor, requiring visitor surveys, resident surveys, etc. The money would be better spent elsewhere. In general, some plans try to quantify too much.

Compatible Management. In several plans, a long-term goal states that a designated percentage of activities on the external boundaries of the park unit will managed to be compatible with the purposes of the park unit (e.g. YUCH, GAAR, WRST). Care should be taken to avoid the impression that NPS is extending its boundaries or jurisdiction beyond park boundaries or onto inholdings. Cooperation and compatible management are laudable goals. To avoid incorrect perceptions, however, they should be portrayed in terms of voluntary cooperation and maintaining mutual "good neighbor" relations.

Subsistence. Subsistence considerations are addressed unevenly in the Strategic Plans. The subsistence resource commissions are identified in some, but not all, plans. Only the draft plans for Denali, Wrangell-St. Elias and the Western Alaska park units have included any goals related to subsistence. Are such inconsistencies consequential? This important category of public use merits adequate attention in long-range planning. In addition, the Alaska Support Office should cover this topic at a statewide level. The goal statement for subsistence found in the Wrangell-St. Elias draft plan is a good example of how subsistence should be addressed.

Application. The concept of strategic planning may be useful to the state and public in proactive evaluation of federal actions rather than just reacting to issues. This usefulness depends upon NPS intent to actually use the process, rather than just resorting to surveys and “bean counting,” and to be truly accountable for their activities. It also depends upon future ability to revise the plans, including active public and state participation in such revisions. Presently there is no discussion of a revision process should one of the plans need issues added or modified in the future, although we are aware this is a “first cut.” Usefulness of the plans could be improved by adding a process for further plan review and evaluation, including a mechanism for the public to assess the federal agencies accountability. Several questions remain unanswered; e.g., as presently written, will activities not included in the strategic plans not be allowed? and what will happen to an agency that fails to meet the goals and accountability requirements?

The actual strategic planning component of the plans (plan segments associated with land management decisions) will be useful, but other components of the plans do not seem to fit the strategic planning mold (more operational in nature) and may not prove useful when evaluating accountability. We urge careful editing out of operational targets; replace them with specific products of cooperative land management efforts.

Relationship to ANILCA. ANILCA contains many requirements for management of the conservation system units designated and expanded by that Act in Alaska. We recommend inclusion of a thorough acknowledgment of these requirements as measurable goals and objectives, including:

- **Management Plans:** Section 1301 of ANILCA required detailed general management plans for each park unit, to be developed and revised with active participation by the public and state. Although the general management plans were adopted in the mid to late 1980s, some portions of these plans are yet to be completed after 17 years, such as the Section 1301(b)(4) requirement for detailed documentation and plans for transportation and access. Several NPS resource management plans and Subsistence Resource Commissions have prioritized the need to complete these plans, but only one of the strategic plans addresses the need to do such a plan.
- **Access for pre-ANILCA activities:** Section 1110 of ANILCA guarantees access to and on the park units for the conduct of traditional (pre-ANILCA) activities generally occurring in the general vicinity. These access guarantees specifically protect motorized access, such as snowmachines, airplanes, and motorboats, except where a finding is made of resource damage. Most of the strategic plans fail to recognize these access guarantees. The plans instead tend to focus on philosophical orientation to “preserve”, to favor only one side of management constraints, and pursuit of studies toward reducing public uses rather than ways to accommodate such uses. We urge each plan to commit to protecting pre-ANILCA activities and associated access in order to fully implement ANILCA and, where studies indicate a finding of resource damage, identify public processes to address access impacts while reserving prohibitions (closures of access methods) as a last resort.

- Management of fish and wildlife: Section 1314 of ANILCA confirms the state as the manager of fish and wildlife. In this role the state assesses the health and welfare of the fish and wildlife populations, as elaborated in the Master Memorandum of Understanding between the NPS and the Alaska Department of Fish and Game. This statutorily clarified role and subsequent cooperative agreement should be included in each strategic plan (as it was in each general management plan) with a measurable goal for implementation.
- Wilderness Management: Section 1110(a) of ANILCA specifies congressional intent for management of access in all conservation system units including wilderness areas in Alaska park units. Congress specifically protected the use of motorized access and pack animals for traditional (pre-ANILCA) activities. These are reflected in the regulations adopted by Department of the Interior in 43 CFR Part 36 regulations for units in Alaska. Section 1316 also protects the use of mechanized equipment necessary for the taking of fish and wildlife (e.g. camps water pumps, generators) in all conservation units including wilderness. A policy implementing this intent was adopted by the Alaska Land Use Council, of which NPS was a member. In contrast, the strategic plans reflect intent to reduce aircraft and other motorized activities in wilderness areas without the appropriate context that these activities can be compatible with wilderness management.
- Consumptive uses natural part of ecosystems: During development of each of the general management plans in Alaska, we urged the NPS to educate visitors that consumptive uses, particularly subsistence activities, were recognized by Congress as legitimate uses. Gates of the Arctic and Western Alaska plans acknowledge this in the introduction but only Wrangells acknowledges ongoing human consumptive uses as part of the natural ecosystem throughout the plan. The Wrangells' "Mission, Significance, and Purpose" discussions of the role of humans as a natural part of the ecosystem is well-written, balanced, and succinct. We urge other units to include comparable language. We also request that all units with protections for subsistence and other consumptive uses of fish and wildlife include both short and long term goals to increase visitor understanding. The only goals presently address "understand and appreciate the preservation of parks and their resources" without the consumptive uses being recognized as a natural and carefully managed part of the parks and preserves in Alaska.
- Training of new and current staff in the legislative differences for park units in Alaska by those with ANILCA/ANCSA expertise should be included in plans for all park units. So far such training has primarily focused on high level administrators. It should also reach seasonal visitor contact personnel and those persons preparing interpretive materials.
- Goal Category IV "Ensure Organizational Effectiveness" should include missions goals that do not duplicate research and management activities already conducted by the State of Alaska and/or should be oriented toward cooperative funding strategies. This is particularly true for activities associated with subsistence research and information regarding harvests and health of fish and wildlife populations, where the state already has expertise and responsibilities.

The likelihood of successful strategic plans for Alaska park units would be increased if reviewers and land managers were made aware of specific ANILCA provisions acknowledging the unique management constraints on Alaska's public lands. To accomplish this, we recommend that all the strategic plans for the Alaska units include up-front a summary of ANILCA provisions and also include how each unit measurably intends to implement these provisions. (A review of the general management plans and possibly the resource management plans, their recommendations for implementation, followed by an assessment of what specifically needs yet to be done would be a good starting point.)

COMMENTS SPECIFIC TO INDIVIDUAL PLANS

ALASKA SYSTEM SUPPORT OFFICE

Several general comments above should be directly addressed as goals for the regional office, such as:

- assuring consistency of state and public participation in step-down planning to implement the general management plans
- educating visiting public about the natural and legislated role of consumptive uses in and adjacent to park units
- committing to support the subsistence resource commissions in reviews of all decisions which affect hunting opportunities in the parks.
- ANILCA/ANCSA training in cooperation with the state agencies and public having expertise and responsibilities which overlay park units.

Goal IIIb.1 "NPS (Alaska), with partnership assistance, has conserved 200 additional miles of trails including those protected by easements or reservation on master title plats, 100 additional miles of protected river corridors, and 200 additional acres of parks, open space, from 1997 totals." The plan should identify whether these areas are within or outside the park units and clarify the nature of "partnership assistance"

DENALI

We recommend adding a goal addressing a land exchange with the state along the common boundary with Denali State Park (previously attempted in the 1980's). The object of this trade would be to redraw park boundaries along rivers rather than townships lines, to help in field management and public recognition of the different jurisdictions and their differing rules and regulations. Since considerable documentation exists from the first attempt, a new proposal would not be starting from scratch.

We understand that the stated Northern Access goal for 2002 to "preclude development of a road or railroad along the Stampede corridor" was included in error in the draft document and that this does not represent park or NPS policy.

The South Side Development Goal for 2002 starts out with "By 2002, a studies plan ... is completed". We hope it does not take 5 years to do a studies plan, as this goal implies. Further down it implies the study plan will be done sooner than 2002, as we have assumed.

GATES OF THE ARCTIC

Goal Ia.1 "25% of the identified park populations of listed threatened and endangered species with critical habitat on park lands or requiring NPS recovery actions have an improved status and an additional 25% have stable populations." Any listed threatened or endangered species should be noted. We are unaware of any threatened or endangered species found within the park or preserve.

"(GAAR LTG Ia 9) 100% of the key wildlife species . . . will be managed so that the populations are natural and healthy. There are no significant human influences on population structure or dynamics." This goal is inconsistent with ANILCA. Congress specifically recognized subsistence uses in the parks and additional consumptive uses in the preserve units. The "natural and healthy" criteria applies only to the park portions of the units and is not defined to exclude human influences, which have been ongoing for centuries. Furthermore, the plan should recognize that the State of Alaska manages fish and wildlife.

"GAAR LTG Ia 12) By 2010, 100% of park wilderness lands are preserved for their wild and undeveloped character." Wilderness designations in Alaska under ANILCA provisions were established for large acreages, some of which already contained developments, access routes, trails, airstrips, homesteads, spike camps, trapper and public use cabins, among others. ANILCA also protected ongoing use of motorized equipment for access and related to fishing and hunting activities. The presentation of this goal implies an inappropriate focus on only one facet of the Wilderness Act's directions without recognition of ANILCA amendments that modify wilderness management in Alaska. For the many readers who are not familiar with ANILCA it is important for the NPS to avoid inaccurate assumptions about wilderness management.

GLACIER BAY

Park Mission Goal Ib. We request this section be amended to include a genuine and measurable commitment to cooperating with the State of Alaska in the prioritization, design, conduct, and evaluation of natural resource studies and management.

We request some recognition of the existing and/or developing sport fisheries that take place in the Dry Bay area. Currently the purpose section only acknowledges the commercial fishery. There are two sport fishing lodges on the East Alsek River in the preserve that cater to primarily coho anglers in the fall, but there is a king salmon fishery that occurs there in late May also.

Additionally, there is interest in developing a king salmon sport fishery on the main Alsek River. This will depend on negotiations with Canada to implement changes resulting from new research directed at establishing a valid king salmon escapement goal for the Alsek River system.

KATMAI

All the introductory quotes of pre-ANILCA legislation establishing Katmai park unit should be deleted. There is no recognition that ANILCA redesignated this unit with contemporary purposes. The text beginning "Section 202(2) of ANILCA" is a more appropriate beginning point. Similarly the section entitled "Park Significance" should be revised to reflect ANILCA and general management plan directions. In particular, the fifth paragraph of this section addressing the Alagnak river should reflect the management provisions for designated rivers in Alaska supersede the Wild and Scenic River Act and are addressed in the "Synopsis for Management of Wild, Scenic, and Recreation Rivers in Alaska" adopted by all Interior agencies to provide guidelines for management of such rivers under ANILCA.

All sections addressing Goal 1b should reflect cooperation with the State of Alaska in subsistence and natural resources issues, studies, and management planning. For example, the references to the Bear Management Plan fail to recognize the state's role as wildlife manager. Commitments to cooperative studies and management recommendations should be included.

Goal IIb. "By 1999, a guided Brooks Falls interpretive program as a primary means of facilitating visitor access and interpretation of the Brooks Falls area has been completed." Does this mean that people will be allowed at the falls only with a guide? Is this proposal consistent with the GMP and/or DCP?

KENAI FJORDS

This plan references wildlife species important in the strategic plan including Stellar sea lions, harbor seals, dall porpoises, sea otters, and gray, humpback, killer fin and Minke whales and five species of Pacific salmon that stage in bays. These marine mammals reside in state waters, not the park, since the area waters were not withdrawn at the time of statehood.

ANILCA lists these species but refers to these animals in terms of hauling and breeding areas, e.g. land based habitats, not marine habitats. Management of these species rests with the US Dept of Commerce, NOAA (National Marine Fisheries Service) and - for sea otters - the U.S. Fish and Wildlife Service. Overall management is under the Marine Mammal Protection Act and to the extent they are classified as threatened or endangered, under the Endangered Species Act. NPS jurisdiction is limited at best--especially since several of the animals travel thousands of miles annually away from the Park. The plan should clarify that the waters adjacent to the park are state owned. Such clarification could be made on line 5, para 2 by noting that the fjord waters are not in the Park.

KLONDIKE GOLD RUSH

The plan should mention the desire by NPS to trade with the State of Alaska for state-owned lands inside the national park. The State is willing to consider such an exchange if local community support exists and suitable exchange lands can be identified, although it is not a top priority of the state.

“Goal 111b2. 80% of communities served are satisfied with NPS partnership assistance in providing recreation and conservation benefits on lands and waters.” What communities are served?--residences of all visitors? Or is this referring to just local communities of the park, i.e., Skagway and Seattle? If the reference to waters means marine waters, this park has none. This goal need better definition of what is being measured to have been done with whom and where.

“Ivb4 Increase by 20%, over the 1997 level, the amount of receipts from park entrance, recreation, and other fees.” The derivation of current interpretive fees and other fee authorities should be clarified because ANILCA does not allow the NPS to charge “admission fees”.

The recently completed general management plan addresses a number of management issues in requiring close cooperation with major land managers, e.g. oversight by the NPS of the community’s zoning and development plans and state ownership of a significant amount of the acreage within the exterior boundary of this unit. Management is primarily focused on recreational uses such as camping and fishing. The strategic plan for this park unit should reflect the many commitments that were made in the GMP in addition to measuring visitor satisfaction.

LAKE CLARK

All the introductory quotes of pre-ANILCA legislation establishing Katmai park unit should be deleted. There is no recognition that ANILCA redesignated this unit with contemporary purposes. “Section 202(7) of ANILCA” is a more appropriate beginning point.

WESTERN ALASKA NATIONAL PARKLANDS

Page 7. How will the NPS measure whether or not 50% of subsistence users felt they played a meaningful role in the management of subsistence resources and uses? We applaud to goal but wonder how it will be evaluated.

The plan for these four units should focus on cooperation with other land and resource managers in the area and to reflect the protections for existing uses of all residents, not just “Native Alaskans”. In particular, we urge Mission Goal 1A to reflect that “human influence” (see page 4) is a recognized part of the ecosystem, including state management of fish and wildlife.

WRANGELL-ST. ELIAS

This plan devotes a considerable attention to obscure topics like "cultural landscape initiatives" and obtaining 2,287 different "data sets", but very little to this park's ability to serve visitors, Alaskans and tourists. Many people in Alaska are looking to Wrangell-St. Elias to be the next big venue for visitation. We see only one mention about visitors being satisfied with their experience. Nothing about improving the quantity and quality of visitor facilities and services in the park, even though we are aware that this is an important aspect of current park management.

Goal Ib2B. It seems rather arbitrary to target a percentage increase in National Register nominations. Nominations should be based on the merits of the individual property, not on an arbitrary target.

Goal Ib2C. What is a CR-MAP and what deficiencies is this referring to?

Page 3, long term goal Ib1A. Managing wildlife used for sport and subsistence purposes as natural and healthy populations is appropriate only for park lands and not for the preserve.

WRST long term goal Ib1A: We question the goals defining management strategy of wildlife populations without including the role of the State of Alaska and without explaining what is believed to be a management strategy inconsistent with "natural and healthy".

Many goals under long term goal IIa1 reflect trying to achieve some level based on 1997 use levels. The park and preserve were established in 1980 following a "monument withdrawal" status in 1978. It would be more appropriate to evaluate and measure pre-ANILCA activities. We also question why use levels should be targeted to not exceed 1997 levels, since given the size and accessibility of the park unit, there is considerable interest in providing increasing uses for visitors. Also, some uses were significantly reduced during early management years because of unknowns regarding uses protected by ANILCA, such as motorized access, subsistence, and recreational activities.

YUKON-CHARLEY RIVERS

Long term goals 1a 8 through 12 need to be rewritten to appropriately reflect that human use is a natural part of the ecosystem and that the State of Alaska manages fish and wildlife populations so they remain healthy. We strongly encourage cooperative efforts as defined in the Resource Management Plan for this unit. We also urge rewriting these goals to more accurately reflect ANILCA intent and the cooperative studies, needs, and goals already adopted in the RMP.

Thank you for the opportunity to provide these comments. We recognize that you are under an extremely tight time frame to get these documents completed. To the extent the various authors are unable to address some of our concerns in this round, we are available to work with you on next year's effort.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sally Gibert".

Sally Gibert
State CSU Coordinator

cc: John Katz, Governor's Office, Washington, D.C.
Marilyn Heiman, Governor's Office, Juneau
Diane Mayer, Director, Division of Governmental Coordination
John Shively, Commissioner, Department of Natural Resources
Frank Rue, Commissioner, Department of Fish and Game
Joseph Perkins, Commissioner, Department of Transportation and Public Facilities
Michele Brown, Commissioner, Department of Environmental Conservation
William Hensley, Commissioner, Dept of Commerce and Economic Development

bcc: Tina Cunning, DFG-Anch
Terry Haynes, DFG-Fbx
Patty Bielawski, DNR-Anch
Priscilla Wohl, DEC-Anch
Joyce Beelman, DEC-Fbx
Clyde Stoltzfus, DOT/PF-Jun
Norm Piispanen, DOT/PF-Fbx
Elizabeth Barry, AG's-Anch
Tom Garrett, DCED Tourism-Jun
Raga Elim, Gov's Office-WDC
Stan Leaphart, CACFA-Fbx

ATTACHMENT

The NPS Strategic Plans were developed pursuant to Public Law 103-62 in order to:

1. improve the confidence of the American people in the capability of the federal government, by systematically holding federal agencies accountable for achieving program results;
2. initiate program performance reform with a series of pilot projects in setting program goals, measuring program performance against those goals, and reporting publicly on their progress;
3. improve federal program effectiveness and public accountability by promoting a new focus on results, service quality, and customer satisfaction;
4. help federal managers improve service delivery, by requiring that they plan for meeting program objectives and by providing them with information about program results and service quality;
5. improve congressional decision making by providing more objective information on achieving statutory objectives, and on the relative effectiveness and efficiency of federal programs and spending; and
6. improve internal management of the federal government.

We urge including the above congressional intent to assist the reviewers, the public, and the park managers in assuring the plans are both adequate and realistic.