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November 26, 1999

Mr. Donald T. King
National Park Service
P.O. Box 908
Martinsburg, WV 25402-0908

Dear Mr. King:

The State of Alaska has reviewed the National Park Service Draft Director's Order concerning Land Protection (land acquisitions) on a national basis. This letter represents the consolidated views of the state's resource agencies. It would have been helpful if the policy had been accompanied by an explanation of how it is different from previous land protection guidance, and request that future draft policy documents include such an explanation. We encourage efforts to monitor use and educate users about all processes dealing with public lands.

The policy appears to be logical, and similar to other land acquisition policies of other agencies. Given the higher level of natural resource protection inherently associated with national park units, however, we caution against granting too much discretion to park managers without additional direction for implementation.

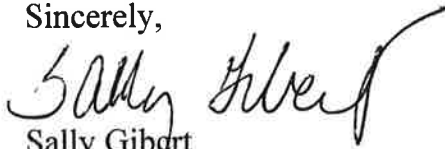
We recognize the Service's desire to acquire land necessary to "...prevent imminent damage or unacceptable threat to park resources." We request, however, additional guidance or a definition as to what levels of damage or threat would trigger this provision either in the context of this order, or as a specific requirement on a park-specific basis prior to taking action. We also request the public have an opportunity to provide input on land protection strategies at the park-specific level.

We are glad to see the numerous references to cooperating with other entities to provide appropriate protection measures when dealing with inholdings and when perceived threats to NPS park resources originate outside NPS boundaries.

In Alaska, which has much larger parks than those in the lower 48 states, we believe this policy should not be used to justify expansion of the exterior boundaries of the parks, but rather should be limited to key inholdings. Relying on land exchanges with willing adjacent land owners, accompanied by public review, is generally a better way to address exterior boundary adjustments.

Thank you for the opportunity to provide these comments. If you have any questions, please feel free to contact me.

Sincerely,



Sally Gibort
State CSU Coordinator

cc: John Katz, Governor's Office, Washington, D.C.
Pat Galvin, 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