



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

ANILCA Implementation Program

Office of Project Management and Permitting

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May 8, 2019

Philip Hooge, Superintendent
Glacier Bay National Park and Preserve
P.O. Box 140
Gustavus, AK 99826

Dear Mr. Hooge:

The State of Alaska reviewed the Draft Glacier Bay National Park and Preserve (GLBA) Frontcountry Management Plan/Renewed Vision for Bartlett Cove Environmental Assessment (EA). The following comments represent the consolidated views of state resource agencies.

We support the intent in the plan's preferred alternative, which enhances visitor opportunities in the frontcountry, restores and strives to increase occupancy of the lodge, and develops sustainable trails that allow people opportunities to experience portions of the park, thereby facilitating recreation and access within the frontcountry area. As a result, the economic driver of the region will continue, and visitor experiences will be enhanced.

Sport fishing

The Alaska Department of Fish and Game (ADF&G) serves as the primary agency responsible for management of fish and wildlife on all lands in Alaska regardless of ownership. Clarification of this role and a commitment to cooperate with the Service in related matters is addressed in the Master Memorandum of Understanding (MMOU) between the Service and ADF&G. We also note federal regulations at 36 CFR 2.3(a) state:

Except in designated areas or as provided in this section, fishing shall be in accordance with the laws and regulations of the State within whose exterior boundaries a park area or portion thereof is located. Nonconflicting State laws are adopted as a part of these regulations.

We request that the respective roles of the State and the Service be fully recognized in the plan along with a commitment to cooperation on issues that affect each agencies' responsibilities. In particular, we request the following modifications to page II-24 of the EA be included in the errata sheet regarding the impacts of the destination (preferred) alternative:

If there were a noticeable change in angler harvest and associated catch rates, which may be predictive of harvest concerns and population viability, park staff would consult with ADF&G to determine whether there is a conservation concern and, if necessary, consider proposals to the Board of Fisheries to implement~~ing~~ additional management strategies to reduce pressures on fish populations from recreational fishing, such as

reducing daily bag limits, limiting gear types, or implementing temporary spatial or temporal closures.

The State of Alaska maintains management authority of fisheries resources. Under all alternatives ADF&G would use its authority through an Emergency Closure or through the Board of Fisheries process to change sport fishing regulations if a conservation concern was present. Additionally, under the MMOU NPS commits to utilizing the State's regulatory process to the maximum extent allowed by Federal law in proposing changes in existing State regulations.

The statement in the document on page II-24 better summarizes the impacts of the preferred alternative:

Therefore, the proposed actions under the destination alternative are not likely to have a significant effect on salmon and anadromous trout at a population level.

Wildlife and hunting

The EA (pages II-24 to II-27) describes how trail construction will have a short-term impact to shorebirds and waterfowl during construction and then a smaller impact and some habitat fragmentation after trails are developed. We concur that these impacts will be minimal even in their cumulative effects and with the extensive habitat available to these species in the area, no impacts to populations would be expected.

The plan (page I-30) also describes development of a trail that would originate in the Dude Creek Critical Habitat Area (CHA) with an associated trailhead. This trail would be a spur or at least join up with the described Point Gustavus Trail. The trail through the Dude Creek Critical Habitat Area is not mapped and so impacts to habitat are not possible to determine at this time. However, the Service should consider the impacts to hunters that use this area extensively. If this trail was built and joined up with the Point Gustavus Trail, it should be expected that bear hunters in the spring and moose and waterfowl hunters in the fall would use both the trail in the Dude Creek CHA and the Point Gustavus Trail to access hunting areas. Interactions among hunters and nonhunter Park visitors may be common especially in the fall at the start of the waterfowl and moose seasons. Signs should be placed where the trail crosses the Park boundary to alert hunters that the Park area is not a hunting area.

ADF&G Division of Habitat permits

Trail building in the Dude Creek CHA will require a Special Area Permit from the ADF&G Division of Habitat. Also, trails crossing streams listed in the Anadromous Waters Catalog may require a Fish Habitat Permit. The Service proposes building several trails crossing streams not listed in the Anadromous Waters Catalog. In 2019, the Division of Habitat staff will survey these streams and update the Anadromous Waters Catalog. Please contact the Division of Habitat Douglas Regional Office at (907) 465-4290 prior to trail construction.

Trails

We support the development of more trails, which are valuable for the public to enjoy wildlife viewing, fishing, and other activities, including in designated wilderness. The plan also proposes to “Widen the entire park entrance road up to 60” and restripe it to support on-grade bike and pedestrian use on one side.” We support this action as the “road would be constructed for year-round active transportation (bike, pedestrian, and ski).”

The plan proposes to deter use and discontinue maintenance for the four-mile trail connector between the Bartlett River Trail and Bartlett Lake (identified as Bartlett Lake Trail on the park website) (page I-26, Excursion Opportunities: Trails). This four mile trail and the very short Bartlett River Trail are the only existing trails within designated wilderness accessed from Bartlett Cove/frontcountry area and the only trails identified on the Glacier Bay brochure map (<https://www.nps.gov/images/Glacier-Bay-National-Park-Map.jpg>). The Bartlett Lake Trail, in combination with the Towers Trail (located outside the frontcountry planning area) and park entrance road, provides a long loop for visitors. Maintaining this trail is supported by the plan’s purpose and need to expand visitor opportunities, and, according to the park website, provides visitors with an accessible wilderness experience: “This primitive trail is a rugged day-hike. During this full-day journey, you may be richly rewarded in wilderness solitude and perhaps the call of loons.” (<https://www.nps.gov/glba/planyourvisit/bartlett-cove-trails.htm>).

We question the reasoning behind the decision to close the Bartlett Lake Trail. While not discussed in the plan, the environmental consequences section of the EA asserts the trail detracts from opportunities for unconfined recreation (page II-37). Closing an existing trail in designated wilderness may affect the undeveloped character of the area but it does not increase its unconfined recreation character. Instead, closing the only trail in wilderness decreases the unconfined recreation character of the area by increasing the management footprint (here in the form of a closure). In addition, keeping the trail open has a positive effect on solitude by dispersing jump-off points for visitors from the frontcountry. Visitors can use the entire length of the Bartlett Lake trail as a jump off point instead of concentrating all off-trail wilderness use at the end of the Bartlett River Trail, or from the road or the Towers Trail.

We therefore request the preferred alternative be amended to maintain the trail for continued use, which will also keep this long loop with the Towers Trail intact. Maintaining the connectivity between the Towers Trail and the Bartlett Lake Trail will also allow this continuous trail system, the majority of which is in the backcountry, to be addressed together in subsequent backcountry planning. We also recommend the following corresponding edits to the plan and EA:

- Page I-26, Visitor Experience, *~~Discontinue~~ Perform minimal maintenance on the four-mile trail connector between Bartlett River Trail and Bartlett Lake. ~~Perform minimal vegetation rehabilitation and place some large rocks on portions to deter use.~~ [EA, CTA]*
- Page II-37, Environmental Consequences, The Destination Alternative. *The development of the proposed Point Gustavus Route and the reroute of the Bartlett River Trail would result in approximately 4.4 miles of new trail, trail improvements, and installations within designated Wilderness near the frontcountry and the removal of 4.0 miles of trail from wilderness (along the Bartlett River ~~and leading to Bartlett Lake~~).*

- Page II-37, Environmental Consequences. *The presence of trails in wilderness detracts from the ~~opportunity for unconfined recreation by potentially limiting self-exploration, self-determination, and~~ reliance on personal skills. Wilderness visitors using trails do not need to have the same skill set as the visitor who is entering wilderness without a trail to explore on their own. In this way, new trails impact the opportunity for ~~unconfined~~ primitive recreation by changing both the skill level the visitor is required to have to encounter wilderness as well as how the visitor interacts with wilderness.*

Public Use Huts

We strongly support the intent to construct two “no-frills” public use huts as a dry and warm option for outgoing and incoming kayakers. Structures such as these are critical to both recreation and subsistence users throughout Alaska. We encourage the Service to determine, in accordance with 1315(d), if similar structures could be used within designated wilderness within the park.

Huna Tlingit Homeland

We support the Service’s intent to partner with the Hoonah Indian Association to present a “living cultural landscape” through the Huna Tribal House and other cultural traditions and stories of the Chookaneidi, Kaagwaantaan, Wooshkeetaan, and T’akdeintaan clans. ANILCA Section 1308 supports the Service hiring local residents with special knowledge or expertise concerning the natural or cultural resources of public lands.

Glacier Bay Purposes

The plan identifies the park unit’s purpose as “Glacier Bay National Park and Preserve protects a dynamic tidewater glacial landscape and associated natural successional processes for science and discovery in a wilderness setting” (page 1-7). This statement is from the Park’s Foundation Statement; it is not one of the park unit’s purposes as provided in ANILCA Section 202(1).

The plan also implies GLBA’s specific purposes are tied to ANILCA Section 101(a) (page 1-11), when Section 101(a) is instead a general statement about the entire Act’s purpose. This section of the plan also describes the park unit’s purposes as:

ANILCA also formalized Glacier Bay National Park as fulfilling two unique purposes within the national park system:

- *A wilderness park, with 2.7 million acres designated to the preservation of wilderness character*
- *A large “sanctuary where fish and wildlife may roam freely, developing their social structures and evolving over long periods of time as nearly as possible without the changes that extensive human activities would cause.” (ANILCA Senate Committee Report 96-413, p. 137)*

This plan complements the ANILCA vision of Glacier Bay as a unique wilderness setting and conservation sanctuary by focusing higher intensity visitor use and development to within a limited zone (7,120 acres) of the 3.2 million acre park.

ANILCA only designated 2.7 million acres of wilderness in GLBA. The entire park should not be described as a “wilderness park,” nor does the quoted Senate Report identify the park unit’s purposes. ANILCA Section 202(1) describes the size and purposes for the expanded Glacier Bay National Monument as follows:

The monument addition and preserve shall be managed for the following purposes, among others: to protect a segment of the Alsek River; fish and wildlife habitats and migration routes, and a portion of the Fairweather Range including the northwest slope of Mount Fairweather.

Further, the purpose outlined for the original monument designation (which does not include the frontcountry planning area), per President Coolidge’s Proclamation establishing the Glacier Bay National Monument on Feb. 26, 1925, described its need for preservation as “...a number of tidewater glaciers of the first rank in a magnificent setting of lofty peaks, and more accessible to ordinary travel; a region that contains a great variety of forest covering ... which should be preserved in natural condition; an area that presents a unique opportunity for the scientific study of glacial behavior and of resulting movements and development of flora and fauna of certain valuable relics of ancient interglacial forests; and as an area of historic interest having been visited by explorers and scientist since ...1794.” We request the first three paragraphs of the ANILCA section be revised for accuracy as follows:

This plan and its actions are consistent with the 1980 Act that designated Glacier Bay as a national park, directing that: for the benefit, use, education, and inspiration of present and future generations, associated with its nationally significant natural, scenic, historic, archaeological, geological, scientific, wilderness, cultural, recreational, and wildlife values (Public Law 96-487, Section 101a). The monument addition and preserve shall be managed for the following purposes, among others: to protect: a segment of the Alsek River; fish and wildlife habitats and migration routes, and a portion of the Fairweather Range including the northwest slope of Mount Fairweather.

ANILCA also formalized Glacier Bay National Park as fulfilling two unique purposes within the national park system:

—A wilderness park, with 2.7 million acres designated to the preservation of wilderness character

—A large “sanctuary where fish and wildlife may roam freely, developing their social structures and evolving over long periods of time as nearly as possible without the changes that extensive human activities would cause.” (ANILCA Senate Committee Report 96-413, p. 137)

The plan also formalizes the early vision of Glacier Bay National Monument as an area “...in a magnificent setting of lofty peaks, and more accessible to ordinary travel than other similar regions of Alaska” and complements the pre-ANILCA vision of Glacier Bay as a unique wilderness setting and conservation sanctuary by focusing higher intensity visitor use and development to within a limited zone (7,120 acres) of the 3.2 million acre park.

Planning and Consultation and Cooperation

ANILCA Section 1301 describes the planning requirements for Alaska park units. Step-down plans, such as this one, can tier off and amend previous plan decisions. Changes to the 1988 Bartlett Cove Comprehensive Development plan are described generally in the plan as “removing some development from sensitive areas” (page I-12). To ensure awareness of proposed changes and eliminate confusion in the future, we request the plan be more specific about previous planning decisions that are being changed or amended during this planning effort.

ANILCA also directs the Service to include the State, to the extent practicable, in the development, preparation, and revision of management plans. We understand recent streamlining efforts by the Department of Interior limited the timeframe associated with completing this plan; however, in 2016 the Service afforded the Alaska State Historic Preservation Officer with an opportunity to provide input on this plan pursuant to the section 106 process (Page II-57). No other outreach to the State occurred during the entire planning process, other than notification of public comment opportunities. The Service has provided the State with opportunities to cooperate in past planning efforts and we reiterate our request for the Service to again be more inclusive in the future, starting with the finalization of this plan.

Thank you for this opportunity to comment. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee", written in a cursive style.

Susan Magee
ANILCA Program Coordinator