



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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February 12, 2021

Don Striker, Acting Alaska Regional Director  
National Park Service  
240 West 5<sup>th</sup> Avenue  
Anchorage, AK 99501

Dear Mr. Striker:

The State of Alaska reviewed the 2021 Proposed Compendiums for Alaska park units. The following comments represent the consolidated views of state resource agencies.

We have one comment on a provision proposed in 2020 and only a few comments on this year's proposed park compendiums, which are discussed in more detail below. The posting of proposed compendiums on the National Park Service's Planning, Environment and Public Comment website (PEPC) is a recent development and we support providing the public with additional methods for commenting. However, it is still unclear how the public receives notice of the proposed compendiums when they become available for the 30-day public review. PEPC postings do not automatically generate notices and there are no individual press release notices posted on any of the individual compendium sites on PEPC or the general compendium website: <https://www.nps.gov/locations/alaska/proposed-compendiums.htm>. The undersigned State ANILCA Program Coordinator received a press release from Glacier Bay National Park and Preserve, and only after inquiring, from the Regional Office. However, despite the efforts to be included on other park unit's individual distribution lists, the coordinator did not receive any other press releases. While they may very well have been sent out, because the Alaska Region is increasingly divesting itself from providing centralized coordination on the compendiums, there is no way to know without inquiring with each individual park unit.

As always, we appreciate the efforts of staff in the Alaska Region to organize the annual compendium meeting between Chief Rangers and state staff and we understand the practical reasons why the Region encourages more direct communication with park staff on issues that arise during the year. However, during this year's review of the proposed compendiums, we found a variety of posting methods on the individual PEPC sites and variations among common entries (i.e., e-bike entries). We encourage the Region to re-establish a single point of contact for the public and other inquiries about the compendiums to better consider the position this new decentralized park-centric system places on the public, especially those that do not have the technical skills that many take for granted in today's increasingly electronic world, and create standardized procedures and formats for noticing, accessing, and presenting individual park compendiums.

We also reiterate concerns we have expressed in previous years that email submissions are not allowed and hard copies of consolidated comments on letterhead, such as the State's comments, must be either

hand delivered to the Regional Office, which has an unmanned lobby and during the pandemic may not even be a viable option, or mailed; it is unclear if they need to be postmarked or received by the comment deadline. The limited submittal options make an already too short comment opportunity less meaningful.

### **Katmai National Park and Preserve**

#### **36 CFR 13.1242 Brooks Camp Developed Area (BCDA) Closures and Restrictions**

It is our understanding that due to the pandemic, the Park has not implemented a permit system for entry into the river as discussed at the 2020 annual compendium meeting with the State. We continue to recommend as an alternative to a permit system, the Park work to address visitor behavior issues by communicating the inherent risks present in the BRCDA corridor (e.g., wildlife, proper gear and attire, etc.) and collaborate with commercial operators on potential solutions and to assist with gathering additional information needed to support the ultimate decision. If you do go forward with the permit system as park staff recently indicated, we also understand that you will be sending the State a draft of your proposed permitting process for review and related efforts in accordance with 36 CFR 13.50(e) (*consultation with the Alaska Department of Fish and Game (ADF&G) on fish and wildlife related restrictions*) and that the draft process will also be available for public review. We also reiterate our suggestion to conduct public outreach both in the King Salmon area and beyond, such as in Homer and Anchorage, where many of the air transporters and tourism operators are located.

### **Lake Clark National Park and Preserve**

#### **36 CFR 13.50 Closures and restrictions**

“An approximately 3.7-acre area of sedge meadow in the Silver Salmon Creek area is closed to all off trail entry from August 1 to September 30. (See attached map.)”

- Issue: Map and proposed compendium language generally identify a closed meadow area at Silver Salmon Creek and do not identify previously developed trails constructed and maintained by the NPS where visitor use is allowed.
- Recommendation: Update map and compendium language to identify by name the Pedestrian and the Pedestrian Fish Box Carts trail providing visitor access to Silver Salmon Creek.

We understand the Park’s concern with the creation of social trails in a meadow area seasonally used by brown bears. Reasoning in the 2021 proposed compendium indicates the sedge meadow in the Silver Salmon Creek area “is currently bounded on two sides by developed trails constructed and maintained by the NPS,” (LACL NPS Proposed Compendium, 2021) yet the associated map does not identify the developed trails constructed and maintained by the NPS. The map only identifies one authorized ORV trail that borders the east side of the meadow.

This proposed closure appears to be an expansion of a prior compendium trail closure that closed a trail crossing the northern portion of the meadow. A map of this previous closure is found on the Park website (<https://www.nps.gov/lac/planyourvisit/silver-salmon-creek.htm>). The map shows the meadow

bounded on the south and west sides by the Pedestrian/Fish Box Carts Trail, identified in yellow, and on the east and north side by the Pedestrian Trail, identified in purple. It would be helpful to the public if the Pedestrian Trail and the Pedestrian/Fish Box Carts Trail were depicted on the trail closure map for the 2021 LACL Proposed Compendium.

The 2021 LACL Proposed Compendium trail closure map depicts the meadow closure in red without identifying the existing pedestrian trails. Because the pedestrian trails are not depicted on the map, this depiction could imply the closure applies to the Pedestrian/Fish Box Carts Trail where it bounds the west side of the meadow and the Pedestrian Trail on the north boundary of the meadow. Our understanding from our recent compendia meeting with the Chief Rangers and reading of the proposed compendium text, which notes the closure pertains to “off trail entry,” is that this appears to be a mapping error and the existing Pedestrian/Fish Box Carts Trail and Pedestrian Trail are still open to the public.

To help the visiting public plan their visit and ensure continued sport fishing access, we request the maps and description in the final compendium be updated to identify that the two existing pedestrian trails in the meadow area are open to the public. We request the following edits:

#### 13.50 Closure and restrictions

- An approximately 3.7-acre area of sedge meadow in the Silver Salmon Creek area is closed to all off trail entry from August 1 to September 30. (See attached map of the Pedestrian and the Pedestrian/Fish Box Carts trails open to use.)

The reason for the proposed addition is as follows:

- Habitat protection. The area is used seasonally by brown bears as a critical food source. It is currently bounded on two sides by developed trails constructed and maintained by the NPS. Concentrated visitor use that occurs during this time period each year has led to loss of vegetation through trampling and the creation of social trails between the Pedestrian and the Pedestrian/Fish Box Carts trails as well as between the developed trails and Silver Salmon Creek.

### **Sitka National Historical Park**

#### **36 CFR 13.50 Closures and restrictions**

- Issue: Compendium entry for electric bicycles was not updated in 2021 to align with 2020 NPS regulatory changes to 36 CFR 4.30.
- Recommendation: Update compendium entry for electric bicycles consistent with the Alaska Region.

All 2021 Alaska National Park and Preserve units, except Sitka National Historical Park (SITK), proposed changes to update electric bicycle entries in the compendiums to reflect NPS regulatory changes to 36 CFR 4.30, which were published in the Federal Register on November 2, 2020 and effective December 2, 2020. To reflect NPS regulatory changes to 36 CFR 4.30 and for consistency with

other park units that do not have any designated roads, parking areas, or trails where e-bikes are allowed, we request the SITK compendium also include an e-bike entry.

Thank you for this opportunity to comment. Please contact me at (907)269-7529 or by email at [susan.magee@alaska.gov](mailto:susan.magee@alaska.gov) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the first name being a large, stylized 'S'.

Susan Magee  
State ANILCA Program Coordinator