

STATE OF ALASKA

SARAH PALIN, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

550 W. 7TH AVENUE, SUITE 1430
ANCHORAGE, ALASKA 99501
PH: (907) 269-7477 / FAX: (907) 334-2509
sally.gibert@alaska.gov

February 13, 2009

Sue Masica
Regional Director
National Park Service
240 West 5th Avenue
Anchorage, AK 99501

Dear Ms. Masica:

The State of Alaska reviewed the draft 2009 Superintendent's Proposed Compendiums for all park units in Alaska, as posted on the National Park Service web site. This letter represents the consolidated views of the State's resource agencies.

We appreciate the Service's continued commitment to annual public review of park compendiums and the opportunities for dialogue throughout the year as issues develop. With the exception of the general recommendation regarding group sizes, the following comments primarily offer suggestions for clarification purposes.

Katmai

2.13(a)(1) Fires: Designated areas and conditions: For clarification and enforcement purposes we recommend specifying how the fire's diameter will be measured (e.g. interior or exterior fire ring, active fire).

4.11(a): Load weight and size limits: permit requirements and restrictive conditions:

We understand the permit requirement for use of the Valley of Ten Thousand Smokes Road is for the specific purpose of public safety and we support that intent. Since 36 CFR 1.2(d) already explicitly excludes the Park Service and its agents from this requirement, we suggest deleting the unnecessary "non-government" reference.

13.25(a) Temporary closures and restrictions to camping

We support the Hallo Bay Meadows camping closure to protect both bears and humans. As you know, a temporary closure in this general area has been in effect for several years. Based on interim observations in the field and dialogue between state and federal biologists, we recommend moving this temporary closure to a permanent regulation at the next available opportunity.

Lake Clark

1.5 Closures and public use limits – (a)(1) Visiting hours, public use limits, closures:

We understand the primary purpose for this permit requirement is to avoid and minimize impacts of large groups on park resources. We are aware of similar restrictions in other Alaska park units and the variations in affected group size; however, the basis for the individual park group sizes is not always clear. We recommend such a clarification. See also our general comment about non-commercial group size limits.

Klondike Gold Rush

36.11(c) Temporary closures to the use of snowmachines for traditional activities:

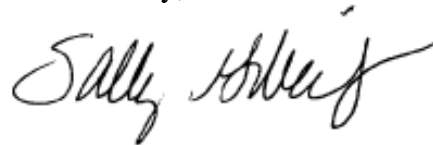
First, consistent with 43 CFR 36.11, we recommend this section be re-titled “Special Access.” Second, we noted a revised map was posted to the website during the public review period. We appreciate the area boundary of the current map follows the road, to the extent the two coincide, which makes it easier for both the public to follow and for enforcement purposes.

Non-Commercial Group Size Permits and Limits

We note that Denali has non-commercial group size limits established in regulation, while Glacier Bay has a group size limit residing in the Compendium. Starting in 2009, Lake Clark is proposing a permit (but not a limit) on larger groups. We are also aware group size is an emerging issue in Wrangell-St. Elias, and that other parks are considering some type of permit or limit. Under the circumstances, we recommend establishment of an interagency working group (with state participation) to evaluate the issues associated with group sizes and identify opportunities for consistency and well as reasons for flexibility, if necessary, to address park-specific needs or conditions. We also wish to address the appropriate implementation tool for various group size limits or permits. For example, if the Service determines a need to retain a public use limitation for the long term, a regulation is the appropriate tool. On the other hand, there may be times when greater flexibility is needed through the compendium, or through a regulation that defers specified parameters to a compendium. We look forward to addressing these issues with the Service in a comprehensive way.

Thank you for this opportunity to comment. Please contact me at (907) 269-7477 if you have any questions.

Sincerely,



Sally Gibert
ANILCA Program Coordinator