

STATE OF ALASKA

SEAN PARNELL, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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May 2, 2012

Greg Dudgeon, Superintendent
Yukon-Charley Rivers National Preserve
4175 Geist Road
Fairbanks, AK 99709

Dear Mr. Dudgeon:

The State of Alaska reviewed the draft Yukon-Charley Rivers National Preserve (Preserve) Foundation Statement (draft). The following comments represent the consolidated views of the State's resource agencies.

We understand direction to prepare Foundation Statements comes from the National Park Service 2006 Management Policies and that information included in the documents will provide a basis for future planning efforts. As such, we anticipate certain information and statements will be duplicated in future planning documents. We are therefore requesting modifications we believe will prove beneficial in the long-term. We are available for follow-up questions or discussions.

While we recognize the last significance statement focuses on human use of the Preserve, overall, the draft does not adequately reflect the importance of human uses and activities as an integral element of the Preserve or the significant compromises made in ANILCA to accommodate continued human use.

The document should better illustrate the importance of local residents, while also discussing that non-local visitors are attracted to the area for its rich resources, heritage, and recreational opportunities. To this end, we request the Service identify people as a "fundamental resource and value" in the "human use" section and include a commitment to working with local residents to address their needs. This is consistent with the Service's Alaska Region Mission Statement:

We serve residents and visitors who seek inspiration, recreation and education, as well as those who come for traditional activities, subsistence and scientific study. (Emphasis added)

Several of the following page-specific comments further illustrate this concern.

Page 4, Purpose Statement. The Alaska National Interest Lands Conservation Act (ANILCA) Section 201(10) directs the Service to "maintain" the environmental integrity of the undeveloped Charley River basin; not "protect" it as indicated. To accurately reflect the purposes of the unit,

(as is the case with the history and archeology significance statement) we request “protect” be replaced with “maintain” in this purpose statement and where it also applies on page 4 (first bullet), page 7 (purpose statement), and page 8 (significance statement).

Page 4, Significance Statements, #2. ANILCA Section 201(10) does not direct the Service to protect “species of management concern,” rather it directs the Service to protect “*habitat for, and populations of, fish and wildlife...*” The document should reflect the Congressional intent in ANILCA. As currently worded, it implies that if a particular species is not a management concern, it is not afforded protection under ANILCA. Additionally, “species of concern” is a subjective term, which can be misused in planning documents. This comment also applies on page 9, where the language is repeated.

Page 8, Significant Statement. In addition to the previous request to replace “protects” with “maintains” to accurately reflect Congressional direction, it is unclear what is meant by “protected” in the following excerpt “...*the only designated Wild river to have its watershed protected in its entirety*” [emphasis added]. We request the following revision:

...the only ~~designated~~ Wild River to have its entire watershed protected designated, in its entirety including its major tributaries.

Page 8, Fundamental Resources and Values, Watershed. Stating that the Charley River is “*unhindered by human activity*” could be misinterpreted to mean there is no human use occurring on the river, which is certainly not the case. We also disagree with the implication that human activity is a hindrance in an area with a stated purpose that includes managing for the public benefit. We request the following revision for clarity:

The preserve protects the entire Charley River in a free-flowing natural state and the entire 1.1 million-acre Charley River watershed is seemingly unaffected by human activity ~~unhindered by human activity.~~

Page 8, Charley River Recreation. The public benefit of the Charley River is not limited to recreational floating opportunities. The river serves as a major access corridor into the preserve, providing local area residents and visitors with a variety of opportunities, including subsistence, as well as hunting, fishing, trapping, wildlife viewing, and other recreational pursuits. In addition, ANILCA specifically recognized the importance of continuing to allow aircraft access in the Upper Charley River watershed, which supports float hunting and fishing and other recreational opportunities in the preserve. We recommend the following addition:

Visitors are attracted to the remote and challenging floating conditions the Charley River offers, as well as float hunting and fishing, and other recreational opportunities, such as wildlife viewing. Aircraft access to the upper Charley River is vital to maintaining these opportunities.

Page 9, Fundamental Resources and Values, Predator – Prey Relationships. The document needs to also recognize that humans have been active participants in this landscape for over 10,000

years and a “natural” predator – prey relationship includes the influence of humans, especially given that this unit is a preserve, where hunting is explicitly allowed by ANILCA Section 203.

Page 9, Fundamental Resources and Values, Partnerships. We request the Service also specifically acknowledge its relationship with the Alaska Department of Fish and Game through the Master Memorandum of Understanding in this bullet.

Page 11, Primary Interpretive Theme. The phrasing “contemporary evidence” does not fully capture the living history in the Preserve and may be offensive to local residents. We request the following revision:

An extensive record of human interaction with the landscape can be found in the preserve, including ancient archeology, Han Athabaskan village sites, gold rush-era mines, and contemporary ~~evidence~~ of habitation and use of Yukon River resources which continues to this day.

Page 12, Primary Interpretive Theme. To emphasize the importance of the traditional and customary subsistence lifestyle, we request the following addition:

Many current residents of the area still practice a the-traditional and customary subsistence lifestyle, which is an integral element of the Preserve.

Page 23, Section 1315, Wilderness Management. Since there is no designated wilderness within the Preserve, we question the inclusion of this provision under “selected excerpts from ANILCA that are most relevant for the day to day management” of the Preserve. We request it be removed.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,



Susan Magee
ANILCA Program Coordinator

cc: Joan Darnell, Team Manager