

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SARAH PALIN, Governor

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April 27, 2009

Joel Hard, Superintendent
Lake Clark National Park and Preserve
240 W. 5th Avenue
Anchorage, AK 99501

Dear Mr. Hard:

The State of Alaska reviewed the Lake Clark National Park and Preserve Foundation Statement. 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 primarily technical clarifications we believe will prove beneficial in the long-term. We are available for follow-up questions or discussions if needed.

Page 4, Fundamental Resources and Values, second bullet: Although the listed species are part of ecosystems that overlap areas designated as wilderness, these species are not dependent on a wilderness designation for survival, as may be inadvertently implied. Therefore we request the following clarification:

...and unimpaired habitats for ~~wilderness-dependent~~ populations of fish and wildlife...

The term "unimpaired" comes from the National Park Service 2006 Management Policies, Section 1.4.4 *Prohibition of Impairment* in combination with 1.4.6 *What Constitutes Park Resources and Values*. This comment also applies on page 6 where the purpose statement is repeated and on page 14 where the language is similar.

Lake Clark protects intact habitat for ~~wilderness-dependent~~ wildlife populations including Dall's sheep, brown bears, caribou, bald eagles, and Peregrine falcons.

Page 4, Significance Statements, #3: While the slang term "red" salmon is defined as "sockeye" salmon in this section, we recommend using the more accepted terminology, "sockeye," exclusively throughout the document.

Page 6, Purpose Statement: We recommend adding another bullet under the second paragraph that addresses subsistence uses permitted under the Alaska National Interest Lands Conservation Act (ANILCA) Section 201(7)(b).

Page 7, Wilderness Character: We note this explanation for “wilderness character” is different from the version provided on page 14. We recommend either using the page 14 version or similarly using language that comes from the Wilderness Act in place of “*absent of built environments and intrusive artificial light.*”

Page 9, Healthy Salmon Populations: To avoid confusion with the Endangered Species Act, we recommend not referring to “critical” habitat. We instead recommend using the term “important” or simply not modifying “habitat.”

Page 10: Predator/Prey Relationships: Since predator/prey relationships are an integral part of the wildlife resources and values for Lake Clark, we recommend integrating the Predator/Prey statement into the Wildlife statement. This approach would also be consistent with the purposes for Lake Clark and the intent of the Master Memorandum of Understanding between the Service and the Alaska Department of Fish & Game concerning management of fish and wildlife. Our suggestion keeps the Park’s intent intact, while avoiding any between-the-lines state jurisdictional concerns:

Wildlife

The park protects intact habitat for, and populations of, fish and wildlife that include bears, ungulates, furbearers, a variety of bird assemblages, and naturally functioning predator/prey relationships.

Page 13, Fundamental Resources and Values, third bullet: As written, this statement may be confusing to the reader. While we value the recognition of subsistence uses, the federal subsistence priority under ANILCA Title VIII only affects allocation when determined necessary by the Federal Subsistence Board (not the park). It may also be appropriate to address subsistence access separately as it is not necessarily a “preference.” As such, we suggest the following revision:

In accordance with ANILCA, The park works to ensure that the local subsistence uses needs receive the highest are afforded priority and access to the authorized over other consumptive uses. Local subsistence users are also ensured reasonable access to subsistence resources.

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

Sincerely,



Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator