

STATE OF ALASKA

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OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

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October 29, 1984

Roger Contor
Regional Director
National Park Service
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Anchorage, AK 99503-2892

Dear Mr. Contor,

The State has completed its review of the National Park Service's (NPS) draft statement for Management for Noatak National Preserve.

As we have stated in the past, the Management Objectives portion of the document is so general that most meaningful specific comment is precluded. The management objectives presented in this draft consist of the standard listing of objectives for all NPS units in Alaska. We have provided comments on these in the past, yet they remain essentially unchanged. Rather than restating our concerns, we reiterate that our previous comments apply.

The following comments regarding resources and issues are intended to assist your efforts in the eventual revision of this document and preparation of the forthcoming General Management Plan (GMP).

Page 2, paragraph 2 - Local residents from the villages of Kiana, Ambler, Shungnak, and Kobuk also enter the Preserve by snowmachine in winter. There are also a few local village residents who use aircraft.

Page 8, paragraph 2 - The list of important subsistence fish species should include whitefish along with salmon and char. Also, the listing of winter subsistence activities should include fishing for char through the ice.

Page 9, paragraph 1 - The 10 August-20 September sheep season in Game Management Unit 23 is for all hunters, not "...all other hunters." The only hunters not eligible are those who qualify for the permit sheep hunt and who actually take a sheep on that permit.

- Page 9, paragraph 2 - "Villages south of the upper Noatak River and from Anaktuvuk Pass hunt and trap in the upper river corridor, principally upstream from the Cutler River" (emphasis added). This statement would be more accurate if it read "villages south of the middle Noatak River and from Anaktuvuk Pass hunt and trap the river corridor, principally upstream from the Kugururork River" (emphasis added). This section could also note that residents from Kiana trap along the middle Noatak River from Kelly River to Nimiuktak River.
- Page 13, paragraph 2 - As a point of information, same-day-airborne caribou hunting has been legal longer (from pre-Statehood to 1975, and 1983 to present) than it was illegal.
- Page 14, paragraph 1 - To the sentence "Adding to these inducements [was] were the provisions for same-day-airborne hunting of caribou" add "and shooting caribou while caribou are swimming."
- Page 15, paragraph 1 - Add whitefish to the list of species sought by sport fishermen.
- Page 16 - In the section regarding issues, no mention is made of the State's authority over submerged lands and navigable waters. Such a discussion is necessary for a complete treatment of river management issues.
- Page 18, paragraph 5 - We question the statement that there has been "increased subsistence harvests on a per capita basis." We request that this statement be substantiated with data. If this assertion cannot be supported with specific data, it should be deleted.
- Page 20, paragraph 1 - With regard to motorized access, the statement that "many recreation groups are advocating" restrictions should be changed to "some recreation groups..." This change removes any editorial connotations about the relative strength of such advocacy. To further focus on the scope of the issue, we suggest adding the following sentence to this paragraph. "Currently, river use consists mostly of local residents who use motorized access for hunting and fishing."
- Pages 22 and 23 - We feel that the most important goal of any NPS public information campaign is informing the non-local residents and non-residents about laws and regulations, private land, and avoiding conflicts with subsistence activities.

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Page 25 - paragraph 1 - Use of "above the Arctic Circle" as an indicator of environmental fragility is misleading and inaccurate. Certainly many northern environments are more sensitive than some to the south, however, the Arctic Circle is an artificial boundary that is irrelevant in this case.

Finally, the State Office of Historic Preservation comments that the document adequately covers concerns for the extensive and significant cultural resources in the Preserve.

Thank you for the opportunity to comment on this draft Statement for Management. If you have any questions about these comments, do not hesitate to contact us.

Sincerely,



Sally Gibert
State CSU Coordinator

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