

STATE OF ALASKA

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET DIVISION OF GOVERNMENTAL COORDINATION

BILL SHEFFIELD, GOVERNOR

STATE CSU COORDINATOR
2600 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2798
PHONE: (907) 274-1581

October 3, 1984

IRD
Sandy Rabinowitch
Outdoor Recreation Planner
National Park Service
2525 Gambell St., Rm. 107
Anchorage, AK 99503

Dear Mr. *Sandy* Rabinowitch:

Thank you for the opportunity to review of the National Park Service's (NPS) draft table of contents for the Cape Krusenstern National Monument General Management Plan (GMP). This draft table of contents for the GMP indicates a solid start for the planning process. While it is difficult to anticipate the specific content of a document based solely on the table of contents, it appears that there may be some subjects which need to be expanded upon or added. Therefore, we suggest inclusion of some additional, specific items to assure consideration of certain issues in the planning and management of the Monument. Many of our comments reflect items we wish to see addressed in all GMP's, hence the length and specifically of these comments. Consequently, I am sending a copy of these comments to other NPS staff who are currently working on draft GMP's so that they also may have the benefit of these thoughts.

Chapter 1 INTRODUCTION

Planning Process and Public Involvement

The NPS planners for the Gates of the Arctic National Park and Preserve have indicated that they are planning to take their draft management plan to the public with an already identified preferred alternative and a listing of other considered, but not preferred, alternatives. This procedure is being followed with the rationale that there is insufficient time to meet the Congressional deadline if too many alternatives are presented to the public without indicating the direction that NPS wants to go. We are concerned that the remaining plans may also follow the same course, thereby decreasing the opportunities and time for public review and comment compared to earlier plans which utilized Alternative Workbooks.

Chapter 2 AFFECTED ENVIRONMENT

Natural Resource Management Policies

The categorical subsections under this heading relate primarily to addressing management policies which focus on human use of the resources. While we support the inclusion of these subsections, we urge that consideration also be given to addressing specific management policies, species-specific management objectives for fish and wildlife, and/or reference and inclusion of the MOU between NPS and ADF&G. We also suggest consideration and inclusion of the State of Alaska's Resource Management Recommendations for Cape Krusenstern National Monument and Surrounding Area, dated February 24, 1984.

Additionally, we suggest NPS include information on:

Water quality and Hydrology - include the identification of anadromous streams located within and adjacent to the Monument.

Wildlife and Fish - consider expanding this discussion to more specifically discuss and identify terrestrial mammals, marine mammals, threatened and endangered species, birds, and fish - (anadromous, fresh water, and marine).

Cultural Resources

We suggest adding two other categories of cultural resources for consideration in management and planning decisions. These categories exist in law (e.g. Alaska National Interest Lands Conservation Act (ANILCA)) or are important in understanding the ways in which lands are used by local residents (travel, subsistence, etc.):

Sites Associated with Oral History and Culture
(Intangible Resources)

Alaska Native Claims Settlement Act Section 14(h) 1 sites
(Native Cemetery and Historical Sites)

Socioeconomic Characteristics

In order to adequately characterize the region, a section describing the Inupiat (Eskimo) culture of the region is needed, such as adding a section called "Regional Cultural Characteristics."

Subsistence Use, Activities, and Trends

The Monument is located in a geographic area that is presently, and has been in the past, intensively used for subsistence purposes. The archaeological record within and adjacent to the Monument bears strong testimony to the long term use of the area for subsistence purposes and residence. Based on planning activities in other park units we are concerned that the NPS may utilize existing subsistence information that is not current or was not rigorously collected with sound methodologies, and that missing data for an area or use will be incorrectly interpreted as no use for an area or resource. We suggest adding a section called "Scope and Adequacy of Existing Data."

The same comments and concerns apply to the section on Uses and Activities on Adjacent Lands.

We request clarification of NPS's meaning and intent in trying to identify recreation and subsistence trends in the area. Baseline data for these activities are insufficient to assess trends for management purposes. In addition, we know of no ongoing monitoring program on subsistence harvest from which trends can be established in this region.

Chapter 3 MANAGEMENT POLICIES

Management Zoning

Based on our understanding of the Management Zoning concept for national parks, we feel strongly that there is not enough information available to adequately define management zones at this time, especially for the northern region parklands. We suggest deferring this decision until a more comprehensive understanding of the areas' traditional and evolving use patterns has been developed.

Instream Flow Workplan

Because Federal water policy requires deferral to Alaska's water management policy and statutes (AS 46.15) for all federal lands, including Congressionally established reservations, the GMP should include a specific section which outlines NPS's proposed policies and workplan for securing such instream flow reservations, such as on page 83 of the draft final Yukon-Charley Rivers GMP.

Research

Because of its importance to the understanding and management of resources, and because of the high degree of use that the Monument and adjacent area receive for subsistence uses, commercial fish, and travel, we strongly urge that an additional

chapter be added that addresses "Research." Items to consider in this chapter include:

Vegetation research, removal, and study

Fisheries and wildlife research - access methods, timing, radio collaring, tagging, and other marking of fish and wildlife. Planning and research should include ADF&G in accordance with the Master Memorandum of Understanding between ADF&G and NPS.

Enclosures and Exclosures, other Temporary Research Structures

Cooperation with Other Agencies, Institutions, Universities, and Native Corporations

Subsistence Research

Access to Data and Timely Dissemination of Research Results

Policy on Research within the Monument

Renewable Resources

Non-Renewable Resources

Human Subjects

Visitor Use - we suggest adding:

Access - a consolidation of all policies relating to access, including management objectives for Revised Statute 2477 roads and trails.

Commercial Operators - current use patterns and management policies.

Cabins - This section should also address temporary and seasonal use structures such as caches and fish camps.

Administration of the Monument - we suggest adding:

Access for Operations

Method for Operations

Search and Rescue Policies

Access and Transportation Corridor Management Policies

Although an assessment of existing access characteristics, both to the Monument itself and to private lands within the Monument, are addressed under Chapter Two - Socioeconomic Characteristics, there does not appear to be a section specifically addressing possible transportation corridors through the unit. In recognition of the proposed Northwest Alaska Native Association.

(NANA)/NPS land exchange and because access to the Red Dog projects and other mining claims in the western Brook's Range will undoubtedly remain a central issue in the management of this Monument, it is imperative that the GMP specifically address the relevant management intents and objectives.

Chapter 4 DEVELOPMENTS

It is not clear whether or not the GMP is addressing operations, visitor, or commercial operations' facilities in the Monument and Kotzebue. NPS should consider the establishment or provision for temporary or seasonally used facilities and sites in connection with fish and wildlife research, subsistence research, archaeological and historic sites investigations or other research activities in the Monument.

Chapter 5 LAND PROTECTION

Land Status

The Department of Natural Resources is now finalizing a state-wide regional land status map at the same scale that is used in most NPS planning documents (1:1 million). We would be pleased to share the results of this extensive research project if requested. In previous plans, we have frequently noted significant errors on the land status maps.

We suggest adding the following categories:

State Lands within and adjacent to the Monument

Native Allotments

Other Small Tracts

Rights-of-Way, Roads and Trails

Coordination and Cooperative Agreements with Adjacent Land Managers

Coordination with Other Land Use Planning Efforts (e.g., Department of Natural Resources, Northwest Alaska Area Plan, NANA Regional Strategy, etc.)

Coordination with Other Land Use Planning Efforts (e.g.,
Department of Natural Resources, Northwest Alaska Area
Plan, NANA Regional Strategy, etc.)

We have no comments on the sections entitled Environmental Assessment and Wilderness Suitability Review since no specific subheadings were given. However, if outlines of these sections are available in the future, we would be pleased to review these also.

We hope that these comments will assist you in the preparation of the draft GMP for Cape Krusenstern National Monument. If you would like any additional information or clarification, please feel free to contact me. Once again, thank you for the opportunity to provide these comments in this early phase of your planning process.

Sincerely,



Sally Gilbert
State CSU Coordinator

cc: L. Beal, NPS
C. Gilbert, NPS
S. Stutzman, NPS
J. Mosby, NPS
L. Nebel, NPS
B. Welch, NPS
State CSU Contacts

Draft Table of Contents attached

CAPE KRUSENSTERN GENERAL MANAGEMENT PLAN

CONTENTS

General Management Plan

Chapter 1 INTRODUCTION:

Mandates for Management of the Monument
Management Objectives
Monument Issues
Planning Process and Public Involvement

Chapter 2 AFFECTED ENVIRONMENT:

Regional Overview:

Surrounding Lands
Brief Description of the Monument
Access to the Region

Natural Resources:

Air Quality
Climate
Geology
Paleontology
Oceanography
Soils
Hydrology
Vegetation
Wildlife and Fish
Scenic Character

Cultural Resources:

Historic
Archeologic

Socioeconomic Characteristics:

Regional Economy
Regional Population Statistics
Access
To the Monument
Circulation in the Monument
To Private Lands in the Monument
Historic Uses and Activities
Commercial Fishing

July 87

Current Recreation Uses, Activities and Trends
Subsistence Use, Activities and Trends
Uses and Activities on Adjacent Lands
Water Rights

Chapter 3 MANAGEMENT POLICIES: (alternatives)

Management Zoning:

Wilderness Zone
Natural Zone
Development Zone
Archeologic Zone

Natural Resources Management:

Wildlife and Fish
 Hunting
 Fishing
 Trapping
Fire Management
Naviagable Waters
Historic Uses
Commercial Fishing
Recreation Uses
Subsistence Uses
Water Rights
Pollution Control and Abatement
Waste Disposal
Research Recommendations

Cultural Resources Management:

Archeologic Resources
Research Recommendations

Visitor Use:

Information and Interpretation
Existing Facilities in the Monument
 Cabins
 Airstrips

Administration of the Monument:

Staffing
Local Hire
Administrative and Maintenance Facilities
Cooperative Agreements

Chapter 4 DEVELOPMENTS: (alternatives)

Facilities in the Monument
Facilities in Kotzebue

Chapter 5 LAND PROTECTION PLAN:(alternatives)

Land Status
-Private Lands
Federal Lands
Alternatives

Environmental Assessment:

(subheadings to follow later)

Wilderness Suitability Review

(subheadings to follow later)

Appendixes:

Alaska Coastal Zone Management Consistency Determination
NPS/ADF&G Master Memorandum of Understanding
(additional as appropriate)

Bibliography:

Planning Team and Consultants: