



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Citizens' Advisory Commission
on Federal Areas**

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August 30, 2016

Via Email

Bruce Rogers
Wrangell-St. Elias National Park & Preserve
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Re: Proposed Action – Wrangell-St. Elias Backcountry and Wilderness Stewardship Plan

Mr. Rogers:

The Citizens' Advisory Commission on Federal Areas in Alaska (CACFA; Commission) has reviewed the Proposed Action for the Backcountry and Wilderness Stewardship Plan amendment to the Wrangell-St. Elias National Park and Preserve (WRST) General Management Plan. The Commission sincerely appreciates this opportunity to comment on the direction of the planning effort at this point in the process. In particular, the range of available methods of submission and the extended time period are accommodating to so many interested Alaskans and others, who have been able to carefully consider and plan their participation during the busy summer months.

The Commission also appreciates the extensive outreach performed to-date regarding this effort, including multiple presentations at CACFA meetings, individual and group interviews and workshops with affected stakeholders, early release of a detailed public scoping report and the consistent availability and openness of planning staff. This degree of public involvement will assuredly provide for a more informed process and outcome. It is also reassuring to know there will be an additional opportunity to comment on the draft Environmental Assessment (EA), with an identified Preferred Alternative, prior to the issuance of a final plan amendment.

The Proposed Action presents a generous amount of substantive information regarding the direction of the planning process, much of which was not included in early outreach efforts and some of which is a bit unexpected. The Commission fully endorses the comments submitted by the State of Alaska in its August 9, 2016 letter and offers the following for your consideration in developing the draft plan and in any associated management efforts.

General Comments

The Commission appreciates the phased approach to user limitations and restrictions, where the least restrictive management actions are adopted first and increased only in response to monitoring and observing specific impacts. However, the baselines appear to be manufactured or theoretical, as little to no studies or monitoring data are presented to justify them. Under the phased approach, these baselines will inform almost every management action taken throughout the life of the plan. Some explanation of how each baseline was derived, and from what information, is critical to analyzing and comparing accuracy, function and reasonableness.

The Alaska National Interest Lands Conservation Act (ANILCA) gave the National Park Service a unique gift in authorizing a more comprehensive suite of management tools, and a greater capacity for public enjoyment, than what you would find in park units and wilderness areas outside Alaska. This plan is a chance to capitalize on that opportunity for more diverse and truly unforgettable visitor experiences, and is all the more important in a place where visitation is already limited due to natural, economic and other barriers. ANILCA also respected the fact WRST is home to thriving communities, landowners, businesses and traditions, and those users are a fundamental part of WRST's character and history. This plan also provides an opportunity to celebrate this rare distinction and provide for its endurance.

Instead, the Proposed Action appears to depict use of the planning area as a problem. This is different than identifying use as a thing to be facilitated, or even just managed. The undertone of use as inherently disfavored is the most unexpected contrast between the Proposed Action and presentations and outreach provided to date, all of which embraced input from park users. Even the components of the Proposed Action which accommodate existing or expanded use do so hesitantly, almost begrudgingly, reinforcing an implicit assumption that non-use is preferred.

As the WRST General Management Plan is being amended, it is interesting to reflect on one thing that has not appeared to change much over time – the planning area receives very little use, almost imperceptible relative to its size. As noted in the description for what constitutes the backcountry, access to the planning area is not practical using non-motorized or non-mechanized means of travel. Therefore, limiting the ability to use those means of travel is effectively eliminating access to and use of the area, yet that appears to be the focus of the Proposed Action.

Airstrip Availability and Maintenance

Out of the 200 documented airstrips in the planning area, the Proposed Action has identified only 32 of them as “necessary and important access points,” 19 in designated wilderness and 13 in the backcountry. These strips will be maintained to a condition allowing landing and take-off, with various stipulations. Any of the remaining 168 documented airstrips located in the backcountry may be considered for maintenance through a permit and, if located in wilderness, will not be considered for maintenance by anyone. Replacement or relocation is not allowed unless the strip provides key support to concessions or satisfies legal access guarantees. No information is given on the creation of new airstrips, which could be allowed throughout the planning area, but the focus on maintenance, replacement and relocation appears to imply these will not be considered.

Despite the fact it is hard to imagine only 32 airstrips provide “necessary and important access” in an area over 11 million acres in size, there is no explanation as to the predicted longevity of 168 airstrips that cannot be maintained, easily or at all, and what that means for accessing the unit. And, even if maintenance is authorized or available, the prohibition on relocation could bear the same result. Remote airstrips can be lost for a lot of reasons, sometimes very quickly. Basic safety concerns could also preclude use permanently unless the airstrip is moved, even if only a partial relocation or short distance away is needed. Sometimes relocation can even result in fewer resource impacts or lessen the risk of impacts. But there is no scope for it to be authorized under these and other scenarios. Over the course of implementation, park visitors and others could come to find 32 or less airstrips at their disposal under the Proposed Action.

The reduction in airstrips (and in guide concessionaires) could readily result in increased use and impacts to the remaining options, creating an accumulation of jump-off and pick-up points

receiving more use and more impacts than experienced under current management, impacts it could be very challenging to minimize or repair. This possibility does not appear to have been considered. Further, as an increasingly limited number of operators are approached to take on more clients, they will be asked to prepare for and possibly be held responsible for the impacts resulting from increased use of their limited areas. The subjective opportunity to relocate or replace an airstrip serving the concession is not a sufficient or certain solution. Both of these scenarios are even more concerning with a decreasing number of available facilities for those jumping off or waiting for pick up. The outhouses, platforms, cabins and bear boxes proposed for prohibition could have been used to incentivize impacts to smaller areas.

Snowmachine Use

This section is by far the most distressing and unexpected. The Commission sincerely hopes its concerns are unwarranted and merely a product of the limited information presented. If not, this entire section will need comprehensive rewrites and adjustment to be consistent with both federal law and responsible land use planning.

For example, the Proposed Action appears to assert that patterns of use were frozen in 1986 under the existing plan. There is no information which can explain why this interpretation exists. Further, this section proposes that any use beyond that occurring in 1986, or possibly since then, is now closed in some self-executing way. Other than present-day use, to be determined through a study, the over nine million acres in designated wilderness are simply closed to snowmachine access guaranteed by law, despite the text, intent and legislative history of ANILCA, the Department of the Interior's regulated closure process, and the General Management Plan itself noting this use occurred throughout designated wilderness.

The contention that no use was or is occurring at any location in the planning area is entirely unsubstantiated. The Proposed Action even implicitly recognizes its lack of information or a general understanding of snowmachine use in the planning area. As such, these blanket assumptions are not appropriate, especially knowing the consequences under a very novel and unsupported interpretation of when an area can be considered closed.

Desired Conditions and Management Frameworks

The Commission realizes the Proposed Action is a preliminary indication of where the plan is headed and may not include the kind of detail that would be necessary in the plan and associated EA to fully evaluate the desired conditions and management frameworks. As just one example, many terms are used but not defined or described, like “trammeling actions” and what it means when the standard (i.e., the baseline condition) is “none.” The concept of a “desired” condition is also difficult to understand without some idea of how it will be used in managing the planning area. Are these ultimate goals to be accomplished during the life of the plan, are they meant to constructively influence administrative decisions, are they simply informing public expectations, or are they some combination of these things and others?

Also, with the sparse and rather informal proposals regarding management of area uses, many standards and desired conditions appear contradictory but may actually be reflecting the more nuanced management approach in development. For example, in the Black Mountain and Upper Kotsina Zone, the desired condition is for visitors to see designated motorized trails but be unlikely to see any additional trails. However, according to the ORV use section, there would be existing, non-designated trails in the Upper Kotsina zone. The Planning Framework table states

no bear boxes will be installed in wilderness, but the narrative just says they will be discouraged near airstrips. The table also makes it look like no installations other than monuments will be allowed in wilderness zones, and no installations will be allowed in the backcountry at all. If true, this would be inconsistent with the main narrative and significantly contravene federal law.

Instead of speaking to each inconsistency at this point, however, the Commission reserves the majority of its specific comments pending more detail in the draft EA and greater understanding of the objectives and terminology. Regarding this section overall, however, the Commission is most concerned at the prolific application of a wilderness aspect to the zones including areas classified as backcountry.

At over nine million acres, the designated wilderness area covered in the plan is the largest in the United States. Its capacity for use is incredibly limited, not by any given management approach, but merely through its inherent vastness and remote nature. This quality is notably shared by the area classified as backcountry, but the designation is not. This is not a semantic or insignificant distinction. In creating such a large area, many guarantees were made to Alaskans, park users and residents and the public as to what designation would mean, particularly when it came to management and use. To attempt to manage or promote a park or preserve area as if it were wilderness, even casually (e.g., requiring minimum tools), is to severely undermine the careful deliberation that led to the balanced establishment of a park, preserve and wilderness in WRST.

Further, while segregating the area into discrete “zones” can provide certain administrative conveniences, particularly reducing the complexity of applying and monitoring standards and indicators, it is important to remember the ascribed boundaries are not based in law and cannot interfere with statutory and regulatory provisions that apply to the entire unit, to the park vs. the preserve or to designated wilderness vs. all non-designated park and preserve areas. While it is understandable to see backcountry and wilderness as similar in character, backcountry can actually share more with the area classified as frontcountry in terms of management authority. In developing the draft EA, please identify and elaborate on the intended use of “zoning” with the appropriate, designation-specific qualifications.

Thank you for this opportunity to comment on the Proposed Action. We look forward to reviewing the draft Environmental Assessment and ensuring the plan amendment best addresses the needs of the administration, the public and this incredible place in our mutual care.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Sara Taylor', with a long horizontal flourish extending to the right.

Sara Taylor
Executive Director