STATE OF ALASKA

SEAN PARNELL, Governor

CITIZENS' ADVISORY COMMISSION
ON FEDERAL AREAS

3700 AIRPORT WAY
FAIRBANKS, ALASKA 99709

PHONE: (907) 374-3737
FAX: (907) 451-2751

November 10, 2010

Bruce Rogers, Project Manager
Wrangell–St. Elias National Park and Preserve
P.O. Box 439
Copper Center, AK 99573

Dear Mr. Rogers:

The Citizens' Advisory Commission on Federal Areas has reviewed the Nabesna Off-Road Vehicle Management Plan Draft Environmental Impact Statement (DEIS). We offer the following brief comments for consideration during the development of the final EIS and management plan.

The Commission commends the staff of Wrangell-St. Elias National Park & Preserve for their efforts to involve and inform the public during the development of this plan and DEIS. We particularly appreciate the briefings provided to Commission members and staff on several occasions during the planning process. The Commission shares your disappointment about the very limited attendance at some of the public meetings scheduled following release of the DEIS. At the same time we appreciate your willingness to present information and answer questions about the plan and DEIS at other forums such as meetings of the Wrangells-St. Elias Subsistence Resource Commission, regional advisory councils and community organized meetings in Slana and elsewhere in the area.

At its October 21 & 22, 2010 meeting in Anchorage, this Commission unanimously passed a motion to endorse the overall objective of the preferred alternative (Alternative 5), which is to provide for the continuation of off road vehicle use by subsistence users, general hunters and other recreational users. However, the Commission also suggests certain revisions to Alternative 5. We discuss those revisions in more detail below.

Commission members support the proposal in the preferred alternative to improve the degraded segments of the nine trails in the Nabesna area to a maintainable condition in order that ORV use can continue. As the original General Management Plan acknowledged, off road vehicle use has occurred in this and other areas encompassed by the park and preserve prior to its creation in

1980. Off road vehicle use, for subsistence hunting and fishing, access to inholdings, general hunting and other recreational activities is provided for by ANILCA and its implementing regulations and represents a legitimate and traditional use within the park and preserve. We fully support continuation of ORV use for these purposes.

The Commission recognizes that improvement of area trails along with a reasonable and workable management plan under the preferred alternative provides the best opportunity for ORV use to continue while also protecting park and preserve resources. The obvious key to successful implementation is adequate funding for trail improvements, trail realignments, trail maintenance, monitoring and other management activities. The Commission is committed to providing assistance to the National Park Service to secure funding through the Federal budget process and through grants from both public and private sources.

Given the estimated 10-15 year timeframe for completion of all proposed trail improvements, we are concerned about the continuation of existing restrictions on recreational users and the increased potential for restrictions on subsistence users. According to the DEIS, until trail improvements are done, recreational ORV use would only be permitted on trails in fair or better condition. We encourage the NPS to consider interim measures that could restore degraded trail segments to useable condition until such time as funding is provided for final permanent improvements.

The Commission has submitted a request to our Congressional delegation to pursue legislation to restore the ANILCA Section 1308 Local Hire Program. If this can be accomplished, we strongly encourage the NPS to utilize this program to hire local residents for trail construction and maintenance. We are also aware that a number of local residents and other organizations have expressed an interest in volunteering to help with trail maintenance. Recruiting volunteers through cooperative efforts with various groups or organizations can provide labor to supplement a modest investment in materials or equipment for short term improvements. The NPS has a long history of these types of cooperative agreements.

The final management plan should look at ways to prioritize trail improvements projects to direct available funding where it will provide the most benefit. Motorized trails should be given the highest priority and no new non-motorized trails should be constructed until such time as all existing trails are improved to at least a maintainable condition.

Another major component of the preferred alternative would revise the amount of acreage in the Nabesna area originally determined by the 1986 General Management Plan to be eligible (suitable) for wilderness designation. The result would be an increase of 16,929 acres classified as eligible for designation. In our comments on the original GMP for Wrangell-St. Elias as well as the subsequent 1988 Wilderness Recommendation DEIS, this Commission did not support designation of any additional wilderness. While we agree that portions of the Nabesna area which included existing ORV trails were incorrectly determined eligible (suitable) under the 1986 criteria, we cannot support an action that would increase the amount of acreage subject to wilderness management.

The preferred alternative proposes to classify a one half mile wide corridor along 9 trails as ineligible for wilderness designation. We would suggest that a more workable solution would be to classify the general area as ineligible. This would recognize the longstanding motorized use of the area and reduce potential conflicts with other park and preserve visitors engaged in activities not supported by motorized uses.

ORV use by subsistence users in designated wilderness would be required to remain on trails under the preferred alternative. We recommend that off-trail ORV use be allowed in designated wilderness for subsistence users. Such use is consistent with the provisions in ANILCA Section 811 and the regulations at 36 CFR 13.460(b). The area involved is limited, but important to local subsistence users and there appears to be little need to confine use to trails. Adequate monitoring, with appropriate restrictions, when determined to be necessary, will provide sufficient protection.

The Commission appreciates the opportunity to comment on this management plan and DEIS. We look forward to working with the National Park Service and the staff at Wrangell-St. Elias as the plan is finalized and implemented.

Sincerely,

Stan Leaphart

Stan Leaphart
Executive Director