

STATE OF ALASKA

SEAN PARNELL, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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October 26, 2009

Alan E. Watson
Aldo Leopold Wilderness Research Institute
Forest Service
Rocky Mountain Research Station
790 E. Beckwith Ave.
Missoula, MT 59801

Dear Mr. Watson:

The State of Alaska reviewed the Federal Register Notice dated August 25, 2009 regarding Information Collection for the Arctic National Wildlife Refuge Recreation Visitor Study. The following comments represent the consolidated views of the State's resource agencies.

The State supports gathering information with respect to public uses within national wildlife refuges to inform decision making efforts, such as the revision of the Arctic National Wildlife Refuge (Refuge) Comprehensive Conservation Plan. We urge close coordination and cooperation with state agencies that have overlapping management responsibilities within the Refuge, such as the Alaska Departments of Fish and Game and Natural Resources, in the development, implementation and interpretation of the proposed survey. Close coordination during survey development will contribute to mutual understandings about the scope and limitations, and better serve the management planning process. We therefore request an opportunity to review the survey questions prior to their finalization.

The Notice proposes to expand on the 1977 survey by seeking feedback on major factors that influence the range of recreational experiences in the area. These factors include, among others, encounters with other visitors and subsistence use. Since the focus of the survey is recreation, we encourage surveying all user groups that engage in recreational pursuits – not just “*non-local recreation visitors*” and “*non-local, non-subsistence users.*” For example, local users (who are also bona fide Refuge visitors) enjoy recreational opportunities on the refuge, sometimes in combination with other uses, such as subsistence. By surveying only non-local users, the survey results may be skewed. Shedding additional light on the relationship between recreation and other uses without biasing one against the other could be addressed with the addition of neutral questions, such as:

- *What is the purpose of your visit to the Refuge? Choose all that apply. Then provide a range of activities such as river floating, hiking, general hunting, subsistence hunting, etc. – or –*
- *Does the purpose of your visit include subsistence activities or other non-recreational purposes? If so what are these additional non-recreational purposes?*

Relationships between user groups need not be looked at solely through the lens of recreation, since all Refuge users will have an interest in, and may be affected by, subsequent planning decisions. Also, targeting non-local users may prove challenging since many of these visitors are unaware of the differing laws, regulations and policies that guide management of Alaska refuges. We also recognize the difficulty in distinguishing between subsistence and recreational uses in the field, which is all the more reason to provide more equitable survey opportunities.

While maintaining some continuity with the 1977 survey to shed light on long-term trends, the expanded 2009 survey also presents an opportunity to more broadly identify the physical locations visited by recreational visitors. This objective could be accomplished by allowing survey participants to trace their path or identify their visit locations on a small, simple map included with the survey materials.

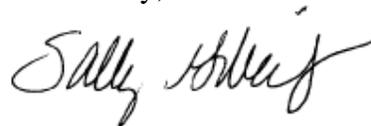
We also recommend the survey address opportunities for compatible wildlife-dependent recreational uses as directed by the Refuge System Improvement Act, including hunting, fishing, wildlife observation, photography, environmental education and interpretation.

The Notice includes mention of “*encounters with other visitors.*” Social conflicts in recreation areas are not always density related, even though managers commonly rely on encounter rates as a measure of such user conflicts. For example, specific behaviors (e.g., irresponsible disposal of human waste, littering, loud voices or other inconsiderate behaviors) can sometimes be the primary problem. Carrying capacity (and corresponding use limits) does little to address these concerns. For these reasons, we appreciate the additional references to vegetation damage, difficulty in finding campsites, litter, etc. as quantifiable measures of visitor satisfaction. We also appreciate questions that address the value and effectiveness of education programs to modify human behavior in ways that benefit all users.

Finally, when the actual survey is crafted, we recommend avoiding use of the term “*high*” quality. Service direction found in Service Manual 605 FW 1, Wildlife Dependent Recreational Policy provides for “*quality recreation programs,*” without a hierarchy, which can be inferred with the *high* qualifier. Similar terms such as *rewarding* can suffice for general discussion purposes without intending a particular standard.

Thank you for this opportunity to comment. Please contact me at (907) 269-7477 if you have any questions. We look forward to working with you as the survey is finalized.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Gibert". The signature is fluid and cursive, with a prominent loop at the end.

Sally Gibert
ANILCA Program Coordinator