

STATE OF ALASKA

SEAN PARNELL, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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March 26, 2010

Greg Dudgeon, Superintendent
Gates of the Arctic National Park and Preserve
Fairbanks Administrative Center
4175 Geist Road
Fairbanks, Alaska 99709

Re: Scoping Comments for GMP Amendment

Dear Mr. Dudgeon:

The State of Alaska received the first Scoping Newsletter for the upcoming Gates of the Arctic National Park and Preserve General Management Plan (GMP) Amendment and Wilderness Study. As articulated in the newsletter and the associated Notice of Intent in the Federal Register on January 27, 2010, this GMP Amendment may consider, among other topics, direction for protecting wilderness values, evaluation of possible new recommendations for additional wilderness designation, new visitor development, and other visitor use and access issues that have arisen since adoption of the 1986 GMP. The letter represents the State's consolidated views at this stage in the planning process.

Wilderness Reviews

The State strongly opposes developing new recommendations for wilderness designation. Alaska is already home to half of the designated wilderness in the United States. Furthermore, fully 86% of Gates of the Arctic is already designated wilderness. Federal management of designated national park wilderness in Alaska, while moderated somewhat by the Alaska National Interest Lands Conservation Act (ANILCA), is nonetheless more restrictive than non-wilderness and subjected to far more public pressure to place limits on the special accommodations provided by ANILCA to recognize the unique Alaskan lifestyle. The State will firmly oppose formal wilderness studies or reviews developed to support wilderness recommendations.

Agency wilderness studies pursuant to ANILCA 1317(a) were completed for Alaska's national park units in the 1980s. While we recognize those original recommendations were not submitted to Congress, there is no need to conduct a new wilderness review. The two non-wilderness preserve areas subject to renewed wilderness review are currently effectively managed to protect and maintain their wilderness character. Seeking additional wilderness designations would therefore be redundant and an inefficient use of scarce management resources. We view the proposal to initiate a wilderness review as an added obstacle to the planning process, as it will

draw public attention away from other issues of importance. We recommend focusing on resource and visitor management issues that can be more effectively addressed in the context of a GMP Amendment.

We are particularly concerned about a recommendation for wilderness designation of the Western (Kobuk River) unit of the preserve. This unit is subject to an expedited decision making process for a right-of-way between the Ambler Mining District and the Dalton Highway, pursuant to Section 201(4)(b)-(d) of ANILCA. While a wilderness recommendation will not preclude consideration of such a right-of-way, it will certainly make it more difficult to adhere to the congressionally mandated timelines in ANILCA. ANILCA Sections 201(4) and applicable sections of Title XI indicate that, unlike other transportation and utility systems considered under Title XI, an Ambler right-of-way would not be subject to additional congressional authorization if it is designated wilderness in the future. We request this point be clearly stated in the draft GMP Amendment. Such clarification that a wilderness designation in this area would not preclude the Ambler right-of-way will be of interest to wilderness advocates who may seek designation for this purpose.

Backcountry Planning

Based on our experience with development of the Denali Backcountry Plan and its subsequent implementation, we recommend use of simpler methods of monitoring and more refined and realistic standards and indicators. The Denali Plan, while well-intentioned, is difficult to implement due to the lack of data and the challenge of using quantitative measures to achieve inherently subjective goals.

Thank you for your consideration of these comments. If you have any questions, please contact me at 907-269-7477, or Sue Magee at 907-269-7529.

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