



December 3, 2015

Eric Veach, Superintendent
Wrangell St. Elias National Park and Preserve
P.O. Box 439
Copper Center, AK 99573

Dear Mr. Veach:

The State of Alaska reviewed various scoping materials for the Wrangell-St. Elias National Park and Preserve Backcountry/Wilderness Stewardship Plan. The following comments represent the consolidated views of state resource agencies.

We understand this will plan will be an amendment to the park's 1986 General Management Plan. This early plan includes recognition of the unique provisions in the Alaska National Interest Lands Conservation Act (ANILCA), which direct management of park units in Alaska, such as provisions that recognize the importance of subsistence to local residents, establish rights of access for inholders, allow for cabins and motorized methods of access for subsistence and other traditional activities, including within designated Wilderness. We are impressed with the scoping materials that provide that important context and request the plan amendment carry forward that recognition and specifically identify the unique provisions in ANILCA that apply to the park's backcountry and designated Wilderness.

Outreach

We commend the Service for its extensive outreach efforts in this initial scoping phase of the planning process. Multiple public meetings and one-on-one interviews with commercial operators, residents, Subsistence Resource Council members and others who are knowledgeable about the park and its history will provide a good foundation for identifying and evaluating various strategies to resolve management issues. We also appreciate the effort by the planning team to reach out to the State to provide an overview of the plan's scope and related issues. We look forward to working collaboratively with the Service throughout the planning process.

Anticipated Management Challenges

The following comments address issues identified in the scoping materials as relevant to this planning effort.

Visitor use and impacts

We support the Service's intent to use education and adaptive management to minimize undesirable impacts from human activity in the park, including impacts from campsites, social trails, human waste, and trash to the greatest degree possible to minimize the need for closures or use limitations. The scoping documentation indicates that visitor use is increasing and that monitoring efforts have found

increasing impacts from human activity in the park. We request that those impacts be quantified in the plan to provide context and justification for proposed response strategies and ultimately, defensible management decisions.

Airstrip management and maintenance

Airstrips are vital portals of access into the park. We encourage including proposals that will continue maintenance of existing airstrips as well as consider new airstrip construction as necessary in the future.

Commercial services

Due to the massive size and sheer inaccessibility of much of the park's designated Wilderness areas, it is both important and necessary for commercial service operators to be available to the public as a means to provide access for recreation and other uses. Existing operators in the park are currently providing that essential service and we request the plan support them in those efforts.

Cabins management

We support the park's cabin program and request the plan maintain and make available as many cabins as possible, as well as consider permitting additional public use cabins within designated Wilderness, consistent with applicable provisions of ANILCA. Cabins within designated Wilderness are not only necessary for human health and safety; they can be excellent examples of the park's unique cultural history.

Motorized transport

ANILCA provides for motorized transport for subsistence use and traditional activities, consistent with protecting park resources. We request that the plan only address on-the-ground management issues and refrain from imposing any restrictions that would unnecessarily limit access to the park's remote backcountry and designated Wilderness or impose hardships on local residents.

Cumulative effects of use

We request the plan take into consideration the size and scale of park's designated Wilderness areas when evaluating the cumulative effects of resource impacts. Cumulative effects that may be considered unacceptable in smaller park units may be acceptable given the vast size of Wrangell-St. Elias.

Wilderness Management

We are encouraged by the scoping documentation that describe designated Wilderness as an "inhabited wilderness" and the acknowledgement that while the Wilderness Act expresses the ideals of wilderness conceptually, humans are a part of and not separate from the wilderness environment. With that recognition, the following comments stem from discussion in the Wilderness Character Narrative.

Untrammelled Quality

We agree that hunting, trapping, and fishing are a part of the cultural and historic fabric of the park and that they require management of harvest and the need for monitoring. The Service is encouraged to comply with the intent of the Master Memorandum of Understanding and federal policy at 43 CFR Part 24 (State-Federal Relations) to work in a cooperative manner with the State to understand the intent of state management objectives for fish, wildlife and their uses. This includes those benefits afforded all subsistence users, including those hunting in park areas under general state hunting regulations.

Natural Quality

We request the Service be more specific and provide examples and scientific data to support the statements within this section such as “*Predator control programs outside and adjacent to park boundaries..., in turn causing changes that ripple through the entire ecosystem that we are just now beginning to understand.*” Specifically, we request that the Service consider and describe all impacts, including positive, negative and inconsequential. All uses by humans have impacts and it is the job of managers to manage for those impacts within the prescribed legislative purposes for the area.

Undeveloped Quality

We agree with the description of the undeveloped quality of designated Wilderness and that the use of fixed wing aircraft and the presence of cabins are vitally important for visitor access and safety and that this is a position consistent with ANILCA. We support continued maintenance and new construction of airstrips and cabins as is provided in ANILCA.

Eligible Wilderness

The narrative indicates “eligible” wilderness will be considered in the planning process. We understand national policy directs the Service to manage areas determined to be eligible for recommendation in a wilderness study to be managed to preserve the opportunity to recommend designation in the future. However, we request the Service fully consider the limited timeframe allowed for wilderness reviews in ANILCA Section 1317¹ and the historical context associated with the reviews that were conducted in compliance with that provision. Since none of the recommendations were ever forwarded by the Secretary of Interior to the President or Congress, there are no pending recommendations. There has also been no further direction from Congress to conduct future studies;² therefore, the intent behind the Service’s national policy is moot in Alaska. We do not support management strategies that blur or erase the distinction between administratively defined “eligible” wilderness and congressionally-designated Wilderness under ANILCA.

Access

The scoping materials appropriately recognize the size and scale of the park and preserve, noting the importance of various methods of transportation that allow local residents and visitors to access and

¹ ANILCA Section 1317. (a) **Within five years** from the date of enactment of this Act, the Secretary shall, in accordance with the provisions of section 3(d) of the Wilderness Act relating to public notice, public hearings and review by State and other agencies, review, as to their suitability or unsuitability for preservation as wilderness, all lands within units of the National Park System and units of the National Wildlife Refuge System in Alaska not designated as wilderness by this Act and report his findings to the President. (b) The Secretary shall conduct his review, and the President shall advise the United States Senate and House of Representatives of his recommendations, in accordance with the provisions of sections 3(c) and (d) of the Wilderness Act. The President shall advise the Congress of his recommendations with respect to such areas **within seven years** from the date of enactment of this Act. (c) Nothing in this section shall be construed as affecting the administration of any unit of the National Park System or unit of the National Wildlife Refuge System in accordance with this Act or other applicable provisions of law unless and until Congress provides otherwise by taking action on any Presidential recommendation made pursuant to subsection (b) of this section. [emphasis added]

² ANILCA Section 1326. (b) **No further studies** of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, national conservation area, or for related for similar purposes shall be conducted **unless authorized by this Act or further Act of Congress.** [emphasis added]

enjoy park resources. To assist park staff in this planning effort, we are providing a map that identifies various existing access routes in the park, including RS 2477s, ANCSA 17(b) easements, Alaska Department of Transportation Rights-of-Way, and navigable waterbodies. If access by any of these routes would be affected by actions contemplated during the planning process, we request the Service consult with the State in advance.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with a large initial "S" and a long, sweeping tail.

Susan Magee
ANILCA Program Coordinator

cc: Bruce Rogers, Park Planner