



July 6, 2016

Aldo Leopold Wilderness Research Institute
790 East Beckwith Avenue
Missoula, MT 59801

Arthur Carhart National Wilderness Training Center
32 Campus Drive #3168
Missoula, MT 59812-3168

Re: 2020 Vision Draft Interagency Implementation Plan

To Who It May Concern:

The State of Alaska reviewed the Wilderness 2020 Vision Draft Implementation Plan (plan), which is intended to guide collaborative stewardship of America's National Wilderness Preservation System. With over 56 million acres of designated wilderness in the State of Alaska, we are keenly interested in the management of these public lands.

We are supportive of collaborative interagency efforts to make effective use of limited resources, minimize duplication of effort, and ensure consistency and predictability among individual agency practices. The wilderness.net website is an example of such an effort that provides federal and state land and resource managers with useful tools and resources to assist with their respective responsibilities within designated wilderness. For example, the website includes the Alaska Supplement to the Minimum Requirements Decision Guide, which assists managers by identifying the numerous provisions in the Alaska National Interest Lands Conservation Act (ANILCA) that apply to designated Wilderness in Alaska.

Understanding applicable special allowances in a wilderness areas' enabling legislation is crucial to minimizing conflict and developing wilderness management strategies that are consistent with congressional intent. We request the final plan highlight the importance of enabling legislation and individual wilderness area purposes in training efforts and the development of management plans.

The draft plan frequently refers generally to "partners" and we recognize that federal agencies work with a variety of partners, including other federal agencies, state agencies, and affected user groups; however, individual states have mandated management responsibilities on federal lands and we request the draft plan specifically identify state agencies as partners. In the following page-specific comments, we identify sections within the draft plan where we request this important relationship be recognized.

Page-specific Comments

Action 2.1, page 9, Word Revisions - Because of the states' expertise in fish and wildlife management, we request the responsible party "Partners" be revised to specify "Partners, including state partners."

Including the states in the development of this synthesis is integral to creating an up-to-date document, as well as one that will avoid unnecessary management conflicts.

Action 2.2, page 9, Word Revisions - While we are encouraged to see language in the plan for collaborative projects or partnerships with other agencies, we noted only minor passing references to working with the individual states. In consideration of the role the states have for the management of fish, wildlife, habitat and public uses within their borders we request that the plan make a strong statement that ensures federal land managers will fully involve the natural resource managers of all states through coordination meetings, exchange of data, and the internal review of proposals regarding the management and research of fish and wildlife in wilderness areas. This action would be consistent with Sections 4(d)(7) and 4(d)(8) of the 1964 Wilderness Act and various federal agency policy documents, including the U.S. Fish and Wildlife Service Wilderness Stewardship Policy (Section 1.11A-C); the “Policies and Guidelines for Fish and Wildlife Management in National Forest and Bureau of Land Management Wilderness” which was developed by the USDA Forest Service and the Bureau of Land Management in cooperation with Association of Fish and Wildlife Agencies, and the National Park Service’s Director’s Order #41 (Section 6.1 Wilderness Stewardship Consistency).

We recommend revising the following two action items as follows:

Action 2.1: Complete a state-of-knowledge synthesis of law and policy, biophysical, and social sciences related to the management of fish and wildlife in wilderness with the inclusion of state natural resource managers responsible for the management of resident fish and wildlife species.

Action 2.2: Strengthen collaborative partnerships, particularly with those state natural resource managers responsible for resident fish and wildlife, for the management of fish and wildlife species and habitats in wilderness.

Action 3.3, page 9, Word Revisions - The compilation of how and why management interventions are conducted in wilderness should include instances where the enabling legislation for the area (such as ANILCA) provides additional management guidance in addition to that of the Wilderness Act.

Action 4.2, page 10, Word Revisions - The Interagency coordinating group should include active state and federal fish and wildlife managers and researchers in order to provide information on current and evolving fish and wildlife management technologies and guidance on their use.

Action 4.3, page 10, Word Revisions - In their approach to use of aircraft on or above wilderness areas, the interagency aviation working group needs to consider that federal land managers have no authority to manage airspace, and that the enabling legislation for wilderness areas may include exceptions to aircraft landing prohibitions.

Action 5.6, page 11, Word Revisions - Action 5.6 proposes to “*Facilitate inclusion of ecological and social values that wilderness (both designated and other categories of wilderness) contributes to society ...*” As there are no “...other categories of wilderness...” than congressionally designated wilderness, we request that this phrase be removed from the Wilderness 2020 document and that wilderness management only be applied to designated wilderness.

Action 7.1 and 7.2, page 12, Word Revisions - Because native and non-native fish and wildlife cross wilderness and other artificial boundaries, and may predate the designation of wilderness areas, we request state fish and wildlife management agencies be consulted when developing objectives for any management actions of non-native species in wilderness. We request “State Partners” be added as a responsible party.

General Comment, Appendix A, pages 31-32, Word Revisions - To better connect the public to the nation’s wilderness heritage, we request the communication strategies, curricula, and social issues section address subsistence uses, hunting, trapping, sport fishing, and commercial fishing, including the role these users play in supporting the conservation of fish, wildlife and habitat in wilderness landscapes.

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

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