

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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April 11, 2012

Ms. Clara H. Conner, Division Engineer
Western Federal Lands Highway Division
U.S. Department of Transportation, Federal Highway Administration
610 East 5th Street
Vancouver, Washington 98661

Re: State of Alaska Comments on Draft Alaska Federal Lands Long Range Transportation Plan

Dear Ms. Conner:

The State of Alaska reviewed the Alaska Federal Lands Long Range Transportation Plan (LRTP). This type of broad perspective and long-term approach to transportation planning is useful to help guide the development of sorely needed transportation infrastructure within the State. We are aware that the Alaska Department of Transportation and Public Facilities (ADOT&PF) had the opportunity to work with the Western Federal Lands-Highways and the Alaska federal land management agencies in the development of this plan. While the legislative directive for this planning effort found in 23 USC §204 calls for participation of state departments of transportation on the core planning team, we recommend planning efforts for future revisions of the LRTP include other state and local resource management and community development agencies' participation earlier in the process to avoid some of the inaccurate assumptions made in this plan, and further delays to the public review.

More specifically, we also encourage a more robust effort to engage transportation stakeholders in plan development, such as the advisory body employed in ADOT&PF's *Let's Get Moving 2030*. Our experience has been that gathering a group of interested individuals typically provides valuable feedback to planners, builds support for the plan, and allays suspicions about plan intentions.

We recognize that the LRTP is not intended to address project-level issues; however, we are concerned that there is a growing disconnect between the LRTP's goals of "User Experience and Mobility" and the trend for federal land management agencies to increasingly limit rather than promote public access to federal lands in Alaska. The Bureau of Land Management (BLM), US Fish and Wildlife Service (FWS), and the National Park Service (NPS) are increasingly using access limitation as a tool to address real or perceived resource impacts from visitor use. The LRTP does not address the dynamic between transportation systems, visitor use, and resource impacts, yet this is typically a major concern of most recent management plans for individual parks and refuges.

We support the plan's overarching goals to maintain or improve existing transportation assets and to increase intermodal opportunities for access to and across federal lands for visitor use, yet the agency drop-down plans appear to emphasize asset management and lose sight of the long term improvement goals set in the overall plan. We suggest further clarification of the plan's purpose that accurately describes what the plan seeks to accomplish. The goals and objectives introduced in the front section suggest a level of planning and management decision-making that are not actually found throughout the LRTP. The goals and objectives also imply an analysis of the connectivity of transportation systems across federal lands, which does not exist in the plan.

We acknowledge that transportation systems are integral to federal land management agency goals, and that these goals have historically differed from those of the State. A discussion addressing these historic differences to lend some context would be of value, as we look toward future opportunities for cooperative transportation planning. In particular, the plan should recognize that resource development is a primary component of the state's economy and should be discussed as a major consideration in the historic context and future development of the state's transportation network. Incorporating this discussion into federal land management agency planning could prove beneficial in terms of agency missions through improved access and mobility, lower administrative costs, and greater management efficiencies. The plan appears to have ignored this aspect of Alaska's economy, instead presenting a vision of Alaska transportation built around visitation trends. While resource development may be an uncomfortable topic for federal land management agencies, it is clearly a principal factor for Alaska's economic future and its associated transportation development, and should be considered at length in this plan.

The plan also places insufficient emphasis on important rural transportation networks such as airports, unimproved airstrips, trails, navigable waterways and winter travel routes that are essential for travel and commerce between communities within and near federal lands. These communities can be located great distances from one another and from the state's road system, or may be separated by a short distance across federal lands with no other means of access.

We are concerned that the inaccuracies throughout the plan indicate an overall lack of familiarity with Alaska's transportation needs. Several examples follow. The main umbrella plan contains inaccuracies such as listing only 5,497 miles of inland water ways on federal land in Alaska. In the Recreational Trails Program, canoeing is listed as one of the uses but not skiing, even though the subject appears to be terrestrial trails and waterways. The Forest Service plan erroneously states that National Forests are inaccessible by boat or seaplane. As mentioned above, the plan mistakenly states that Alaska has a tourism-driven economy. And finally, BLM designated wilderness does not exist in Alaska.

Addressing system needs and gaps in agency funding for national leadership as the Forest Service LRTP does in Chapter 6 of its drop-down plan is appropriate. We recommend a similar chapter for all drop-down plans.

Roads and Trails on BLM Land

The BLM LRTP asserts that primitive roads and motorized or mechanized trails within lands with wilderness characteristics will not be identified as transportation assets. We strongly disagree with this approach. By doing this BLM is going against congressional intent, which is

abundantly clear in the Alaska National Interest Lands Conservation Act (ANILCA), to preserve access across federal lands, including designated wilderness (See ANILCA Title XI). As this plan is written, lands in Alaska with wilderness characteristics would be managed more restrictively than wilderness areas Congressionally designated through ANILCA. We request rewrites in our page specific comments to align this plan with ANILCA exceptions to the Wilderness Act. The State's ANILCA Implementation Program staff is available to assist in this effort.

Air Access

The plan and drop-down plans should better address air access, in particular for the remote refuges and parks, as it provides the most reliable means of access to these areas. While an increasing number of visitors are relying on this mode of access to federal lands, federal land managers are trending toward limiting access by air taxis in certain parks and refuges throughout Alaska (e.g., NPS Noatak Outfitter Plan, USFS Outfitter Guide Plans, Selawik NWR Revised Comprehensive Conservation Plan), which is counter to the goals of this planning process. The plans do not include counts of unofficial airstrips, yet unofficial airstrips or landing areas are the main visitor access points for many refuges and parks. Likewise the plans address neither agency-provided nor user-provided maintenance of unofficial airstrips. The plans should highlight the role of state-owned airports as gateways to many land management units, the condition of landing facilities on federal land management units and the necessity of aviation to agency missions and function. The plans as written have missed an important opportunity to stress the need for additional aviation facility management staff and funding within each land management agency.

Winter Trails

We have concerns with the plans' limited discussion of winter trails. Extensive areas of Alaska rely on snowmachines as the primary method of surface transportation for much of the year. Federal agencies, in particular the BLM and FWS, maintain winter trail markers, tripods, and shelter cabins to assist winter travel. Yet the majority of winter trails are not accounted for in the plan. The LRTP's lack of accounting for this use and the funds needed to maintain and improve the existing network raises serious concerns about the plan's applicability to Alaska's transportation needs.

Material Sources

The construction of roads, trails, airports and other transportation infrastructure requires construction grade materials. Therefore, the State would support a coordinated planning effort that inventories gravel sources suitable for infrastructure improvements within potential transportation corridors.

Highway Safety

Access control along Alaska's major highway routes is an ongoing concern as the state's population increases, and is an area where cooperative planning efforts to address entering and exiting federal land management areas could reduce potential for crashes and improve traffic flow along Alaska's highways. The recently issued *Alaska Strategic Traffic Safety Plan* <http://dot.alaska.gov/stwdplng/stsp/plan-2011documents.shtml> provides action oriented strategies for addressing access control in its "Roadways" emphasis area. We recommend reviewing and including these strategies in the Alaska Federal Lands LRTP. ADOT&PF is

working toward establishing corridor preservation and access management policy for major road facilities (National Highway System and Alaska Highway System routes) and the recognition of such policies by our federal partners would illustrate to all stakeholders that the State is systematically advancing such policy.

Project-level Coordination

The State looks forward to continued coordination with the federal agencies as specific projects are proposed. At the project-level, the State is likely to have comments on site-specific resource effects. Likewise, increased access may create concerns regarding the allocation of fish and wildlife. These concerns should be addressed through the existing authorities of the Alaska Boards of Fisheries and Game, or the Federal Subsistence Board. We look forward to continuing to work with the agencies at the project-level to address resource issues and to identify transportation assets important to the State, such as RS 2477 rights of way and ANCSA 17(b) easements.

Page Specific Comments

Alaska Federal Lands Long Range Transportation Plan

Cover and title page. ADOT&PF logo is blurry and unreadable compared to all the other logos shown.

Inside cover. Caption for the front cover photo should read “Cruise ship at Sitka National Historic Park, NPS” to align with the NPS drop-down plan inside cover.

Page 1, Executive Summary, 2nd para. We recommend citation of the federal legislation that requires all federal land management agencies conduct long range transportation planning.

Page 2, second bullet, last bullet. Please add the State of Alaska to included entities.

Page 5, second para. The text states that a key objective is to develop and maintain a coordinated, “seamless” transportation system for public and administrative access to federal lands. There should be further discussion of the linkage with the State of Alaska’s transportation planning process. For example, the LRTP should explain the role of ADOT&PF area transportation plans in more detail and discuss how these area transportation plans are integrated with the efforts of the federal land management agency regional coordinators.

Page 6, 1.2 Supporting Livable and Sustainable Communities, bullets. Alaska’s economy is resource driven, not tourist driven. We suggest the following edits.

- *Many of the Federal lands in Alaska are tourist destinations ~~in a tourism driven economy~~*
- *FLMA transportation systems support access to resources, subsistence, and inter-village travel*

Page 8, second para. “Shorter-term plan” appears to miss the point of *plan level activities*. Rather than discussing Statewide Transportation Improvement Program (STIP), Metropolitan Planning Organization (MPO) Transportation Improvement Program (TIP) and Federal Lands Highway TIP, which are programming tools, this section should highlight medium-range or long-range plans that *analyze specific transportation needs and identify potential project solutions*. Land use management plans, comprehensive conservation plans, area long-range transportation plans, MPO LRTPs, borough transportation plans, corridor studies for specific highways or local transit development plans are all appropriate examples of plan-level activities. The STIP and TIP are programming documents that implement plans and use adherence to plans as a criteria for priority ranking of programmed projects.

Pages 8-9, Section 1.6. We recommend a concluding sentence stating the total percentage of Alaska land managed by the four federal agencies.

Page 9, Section 1.7 ADOT&PF Mission Statement. Please capitalize the “m” in “moving” per ADOT&PF official mission statement.

Page 10, very last line. Seismic activity and tsunamis are a constant consideration in Alaska and should not be yoked with climate change.

Page 10, System Management, Objective – Interagency coordination, 2nd Strategy. We request replacing the word “consultation” with “coordination and cooperation” to bring the intent into greater alignment with Federal Highway Administration (FHWA) definitions included in the federal transportation planning regulations (23 CFR 450.104).

Page 11, Mobility, Objective – Coordinated planning. We request the addition of a new strategy to work cooperatively with owners of major roadway facilities to preserve corridor mobility through development of corridor plans.

Page 11, Mobility, Objective – Safety. We request the addition of a new strategy to assist with implementation of the State of Alaska Strategic Traffic Safety Plan.

Page 12, Environment, 3rd Objective. While we recognize this was likely just a typographical error, we request the following rewrite,

Air quality: Maintain or ~~and~~ improve air quality.

Page 12, Climate Change, 2nd Objective: We request deleting this objective as it is too vague to be of any practical value. Is the objective to mitigate, or to provide for compatible uses given assumed agency mandates to mitigate? Each agency is likely to have top-down performance measures driving mitigation of “activities related that may contribute,” making further reinforcement in the LRTP moot and any measures insignificant on a global scale.

Page 15-22 Baseline Conditions. We recommend a discussion of the important role played by public transportation, given the intent of the federal land managers to reduce the ecological footprint of personal vehicles, and the significant role already played by public transportation in accessing some federal lands in Alaska.

Page 15, Section 2.2, 2nd para. We request a discussion of road miles in Alaska per square mile of land compared to other states, to showcase how sparse Alaska's total road network is and how inaccessible by road most of Alaska remains. Based on FHWA 2010 public road mile statistics, Alaska has 1 mile of public road for every 40 square miles of land as compared to 1 mile of road for every 1 square mile of land in the rest of the U.S.

Page 17, Figure 3. Map shows a ferry terminal and ferry route in Seward. AMHS no longer serves Seward. Map is also missing the ferry route to Gustavus.

Page 19, Section 2.3. Although air travel is described as “critical,” there is room to strengthen this section as to just how critical aviation is in Alaska. Looking at the preceding map (Figure 3), an enormous amount of federal land is not accessible from the road grid, and much of it is inland of any coastal waterway access. Aviation is the only year-round means of access to many places in Alaska. Identification and registration of mission-serving unregistered aviation facilities (lakes, airstrips) could be beneficial to the agencies and to the public overflying these lands. We suggest including an objective to support access to public lands by both air taxi and general aviation.

Page 19, Figure 5. With 28% of the registered airport facilities located on federal lands, it would seem important to further clarify who owns these facilities, how they are used, and how better partnerships might be established to make use of and maintain these facilities – possibly providing greater opportunity to accomplish federal land management agencies' missions through their use. Figuring out how to make best use of these existing registered facilities in partnership with the sponsors/owners would be a worthy pursuit.

Page 20, Section 2.5. The word “system” in Alaska Marine Highway System should be capitalized. The number of ports listed should be 33, not 32, and the mileage figure listed (3,500 miles) should be either 3274 nautical miles or 3765 statute miles.

Page 22, first sentence. Per our general comments, we request the following edit: “...travel corridors for subsistence, access to resources, and recreation.”

Page 22, Section 2.7. When discussing seasonal variations, aviation also stands out as one of the modes of access that is less constrained by the seasons than some others.

Page 23, Table 4. We note that the FS and FWS do not have trail improvements on the list.

Page 25-30, Funding. This section would be improved by the inclusion of a narrative discussing the Corps of Engineers (federal) funding mechanism, Federal Transit Administration (FTA)-funded rural and tribal transit programs (managed by ADOT&PF and FTA, respectively) and the state-funded Municipal Harbor Facility Grant Program (managed by ADOT&PF).

Page 26, Table 5. There should be an “X” in the State National Scenic Byways Program for Marine.

Page 27, National Scenic Byways Program, 2nd sentence. Change to read: “Designation is awarded to certain roads and the Alaska Marine Highway System based on one or more...”

Page 29, Airport Improvement Program 1st para, 2nd to last sentence. Add at end “including non-ADOT&PF-owned airports.”

Page 31, Section 4.3 Funding Gaps, 1st para, last sentence. Replace “differed” with “deferred”.

Page 33, Section 5.1 Outreach Levels, 2nd para. Needs revising per earlier comment on Page 8.

Page 36, Table 6. Project team should strive to include the Federal Aviation Administration (FAA) and FTA regional offices in the external outreach efforts, in addition to outreach efforts conducted during the draft plan review and comment period.

Page 39, Modal Plans. Replace second paragraph (Alaska Strategic Highway Safety Plan) with the following:

The Alaska Strategic Traffic Safety Plan (<http://dot.alaska.gov/stwdplng/stsp/index.shtml>), developed in consultation with federal, state, local, and private sector safety stakeholders, used a data driven, multidisciplinary approach involving the 4 E’s of safety – engineering, education, enforcement, and emergency medical services, to identify the plan’s statewide goals, objectives, and key emphasis areas of Driver Behavior, Roadways, and Special Users. The March 2012 updated plan emphasizes in its title (formerly Strategic Highway Safety Plan) that Alaskans travel on more than highways. Alaska’s unique climate and transportation modes mean crashes occur on alternative facilities such as off-highway trails and frozen waterways. Traffic infers that we are looking at all public roads, not just highways, and the many modes on the public road network.

Page 39-40, Modal Plans. Add new paragraph:

ADOT&PF currently does not have a system plan for Alaska Marine Highways or for Alaska’s National Highway System (NHS) routes but may develop plans for these systems. Long-range transportation planning for the Alaska Marine Highway System (AMHS) is addressed in the Southeast Alaska LRTP, Prince William Sound LRTP, and Southwest Alaska LRTP, while NHS routes are addressed in MPO LRTPs, area transportation plans, corridor studies and the Alaska Strategic Traffic Safety Plan.

Page 40, Statewide Transportation Improvement Program. The STIP also includes projects of regional significance as per federal planning regulations.

Page 40, Partner Outreach. Last paragraph should include mention of the role played by the Alaska Railroad and its planning section. Examples include the Spencer Glacier Self-Propelled Motorized Unit in the Chugach National Forest and the role played by the train depot at Denali National Park.

Appendix A, Page 1. The title incorrectly lists ANILCA Title VII instead of Title VIII.

Appendix B, page 4, Figure 2. Delete ferry routes to and stop at Seward. Add ferry stop at Gustavus.

Appendix B, page 7, para 3.1.2 Travel to Alaska, 2nd sentence. Ferry visitation is not currently declining. It would be more correct to say that out-of-state visits to Alaska by ferry have shown a generally declining trend since 1996.

Appendix B, page 20, para 4.2, 4th bullet. The ferry will not soon connect Annette Bay to Saxman, it will go Annette Bay to Ketchikan.

Appendix B, page 21, para 5.3. AMHS provides service to 31 communities in Alaska, not 30 as listed (perhaps this was written pre-Gustavus).

Appendix D, page 2, Contact Information. Rob Campbell and his contact info should be with Central Region. Al Clough and his contact info should be with Southeast Region.

National Park Service Alaska Long Range Transportation Plan

General observations:

The plan is broad policy level, and the NPS relies on various sub-plans to ensure transportation developments are compatible with the NPS mission and the mission of individual parks. In the NPS system, individual unit superintendents have power to develop their own temporary regulations for the specific park unit they manage under a park “compendium” of rules.

The State is concerned with the plan’s selective application of ANILCA access provisions to subsistence and recreation use only. ANILCA, as federal legislation, established or redesignated all of the lands managed by the Service. As such, the access provisions in ANILCA cannot be disregarded by the Service in policy or any other administrative effort; they may only be altered by the consent of Congress.

The NPS drop-down plan states it is not intended to prescribe direction to parks on individual transportation projects, but rather to make determinations on “park clusters” or parks sharing common attributes. NPS puts Alaska parks into four categories: 1) Remote North parks, 2) Remote South parks, 3) Road parks, and 4) Cruise Ship parks, and identifies transportation needs and gaps in mobility for each classification of park. It would be beneficial to note the geographic alignment of clusters with particular ADOT&PF area transportation plans to reinforce the likelihood these needs are considered in the next update of the appropriate ADOT&PF area transportation plan(s).

Gateway Communities: Stronger language is needed in the beginning of the document regarding partnering with ADOT&PF, FAA, FTA, and Federal Railroad Administration (FRA) and other local governments (similar to FWS plan) for transportation facilities in gateway communities. Note under mobility strategies, page 32, the idea to “coordinate with the ADOT&PF and local

governments on transportation planning and projects” is mentioned. This is in keeping with FHWA’s emphasis on consultation, coordination and cooperation and we support this approach.

Rail and Rivers: There is only passing mention of the Alaska Railroad and its importance in visitor access to Denali National Park and Kenai Fjords National Park. This is a primary mode of access that bears a stronger mention, particularly as federal funding for its passenger transportation function cannot be taken for granted. There is similarly little acknowledgment of barge/river access as a mode of transportation. These should be addressed as they form a means of access to specific units in the federal system (e.g., Kobuk Valley National Park, Yukon-Charley Rivers National Preserve, Yukon Delta National Wildlife Refuge, etc.)

Airports: The Plan acknowledges that certain parks rely on ADOT&PF roads for access. It may be prudent to list the predominant reliance (though not in every single unit) on state airport facilities for park access, e.g., King Salmon for Katmai, Port Heiden for Aniakchak, Nome for Bering Land Bridge, Coldfoot for Gates of the Arctic, Gulkana for Wrangell St. Elias National Park, Skagway for Klondike Gold Rush, and for helicopter fuel caches for the necessary administration of these units by state and federal agencies. NPS has leased lots at many of these facilities for hangar facilities and ranger pilot headquarters. National Park Service Aviation facilities play key roles in the aviation system in some areas. At the north end of Broad Pass, McKinley Park airstrip is an important “port in the storm” on one end of a heavily traveled mountain pass. Similarly, Chisana, May Creek and Kantishna airports provide potential landing sites for aircraft transiting large undeveloped areas. Other backcountry airstrips exist in national parks and preserves such as Wrangell St. Elias, Bering Land Bridge, Katmai, and all serve equally important roles.

Page V List of Acronyms. “ATTPL” (Alternative Transportation in Parks and Public Lands) should be “ATPPL” instead (used extensively on page 57, section 3.3.2).

Page 1 NPS Alaska Region LRTP Goals. Typo under System Management Goal “...satisfy cResource Protection.”

Page 5, Introduction, bullets. This bulleted list should include “Transportation and Utility System Corridors” under Title XI of ANILCA.

Page 6, Section 1.1 Relationship to Other Plans. NPS indicates that one of the things General Management Plans (GMPs) accomplish is “identification of existing or proposed Congressionally designated transportation routes.” We suggest NPS include a blanket statement acknowledging existing claims of Congressionally authorized state rights of way under RS 2477, as a guiding component of GMPs for individual park units in Alaska. Additionally, this section would benefit from a brief description of the National Environmental Policy Act (NEPA) process as it applies to NPS transportation plans and projects.

Page 9, Mobility 5. Access. ANILCA access provisions for other than subsistence and recreation need to be considered as well.

Page 12, Figure 3. Shows AMHS service to Seward. AMHS no longer serves Seward.

Page 12, Table 1. Lists Sitka NHP in Road Parks and Yukon-Charley Rivers National Preserve in Cruise Ship Parks. Please switch these designations.

Page 15, Figure 6. We caution averaging the Asset Priority Index across the state because the access needs of the parks are diverse. Roads are categorized as Band 3, “Assets where only some essential operations are important”, yet roads are very important to the Road Parks, and not important to the Remote Parks.

Page 19, Remote North Parks. “With the addition of several visitor centers, Remote North Parks have had a significant increase in the value of their transportation asset portfolio.” We request clarification of this statement. Are the visitor centers themselves counted as transportation assets, and if so, why? What types of buildings are categorized as transportation assets?

Page 24, Table 8 Road Park Transportation Asset Portfolio. We question how the number of trail assets was compiled and subsequently the deferred maintenance and current replacement value. There are nearly 19 trails in the Nabesna Road area of Wrangell St. Elias National Park (WRST). Does the deferred maintenance total include bringing the Nabesna area trails back to a sustainable condition?

Page 26, 2.1.4 Strategies. We request that the Service take into account the lack of access to Alaska’s parks when prioritizing assets. For example, given the few opportunities for road and trail access, those transportation facilities may be higher priority than fuel systems. We also request that the Service factor in the increased costs to rehabilitate a transportation asset after several years of deferred maintenance.

Page 29, Section 2.2.5 Conditions Summary. Indicates that park access is deemed adequate with no significant issues within the region. We disagree with this statement. ADOT&PF has been working on a public airport master plan for the Lake Clark National Park and Preserve gateway community of Port Alsworth, which may be an exception as current park access depends on a private airstrip with safety issues. Additionally, sections of off-road vehicle (ORV) trails accessed by the Nabesna Road in Wrangell St. Elias National Park and Preserve are closed due to severely degraded sections. The trail conditions causing these closures is a significant issue.

Page 30, Conditions Summary, Safety. Why are boat safety issues believed to be increasing in Cruise Ship and Remote South Parks?

Page 31, Table 13. We question how all-terrain vehicle/off-road vehicle (ATV/ORV) trail improvements, hardening, and maintenance is rated lower than ATV/ORV access management. The funds for management have already been secured; however, trail improvements and maintenance have been identified.

Page 32, 2.2.7 Strategies. We support improvements to winter trail safety and airstrips.

Page 34-38, Section 2.3 User Experiences. Both Remote North and South parks are stated to have “unreliable aviation access” involving weather issues, poor airstrip conditions, etc. Airstrip mapping is a stated need for all classifications of parks, and for this some coordination with the

Alaska Aviation System Plan effort and the Statewide Digital Mapping Initiative (SDMI), managed by the ADOT&PF, may be beneficial.

Page 34, 2.3.1, Remote North Parks, Identified Needs, 1. Travel safety. We support safety cabins along winter trails. The maintenance and construction of safety cabins is an important aspect of making winter trails a safe part of the multimodal system. We also support trail markers for intervillage travel.

Page 34 & 36, 2.3 Remote North Parks, Identified Needs, Access. “Issues related to the Alaska National Interest Lands Conservation Act (ANILCA) and State of Alaska Revised Statute 2477 access issues are managed on an individual park rather than regional basis, and are not addressed in this document.” We question the decision to exclude ANILCA access issues from this plan, considering ANILCA created these Conservation System Units and guides access decisions and management. While ANILCA does detail some specific access issues, ANILCA also provides broad guidance for Alaska as a whole. The State considers it a significant oversight for NPS to ignore this formative federal law for Alaska parks and access in a statewide NPS transportation plan. At the very least, ANILCA access requirements should be described as referenced in the Act itself.

Page 36, 2.3.3 Road Parks, Identified needs. Deferred ATV/ORV trail maintenance is a significant issue in the Nabesna area and maintenance and construction need to be high priorities.

Page 41, 2.4.2 Park Unit Surveys and Planning Documents by Cluster, 1st paragraph. The three bullets after this paragraph may be issues; however, they are not needs. We suggest the following rewrite “*The following ~~needs~~ issues were identified:*”

Page 41, 2.4.2 Park Unit Surveys and Planning Documents by Cluster, 3rd bullet. What is the basis for these statements? While dust from the Dalton Highway may have a negligible to minor impact on fish habitat on a localized basis and the highway segments the range of several species, including caribou, it has not been demonstrated that the Dalton Highway impairs the sustainability of any species. We request the document either cite a specific scientific study or remove this bullet entirely.

Page 43, 2.4.3 Needs and Gaps. We question this summary of transportation issues and the lack of needs relating to resource protection. With the low levels of boat use on rivers that flow through National Parks, we doubt motor boat use is causing bank erosion or fish rearing issues. Lichen entering the food chain is beneficial and not an issue. The most important food for caribou is lichen. There are major issues with deferred maintenance of ATV/ORV trails in NPS units in Alaska. Another issue is the lack of connectivity between ferry/airport terminals and Glacier Bay National Park and Denali National Park for independent travelers.

Page 43, 2.4.4 Strategies. We request the NPS prioritize funding to maintain and improve authorized ATV/ORV trails and question the need to “*research the effects of transportation studies on resources.*” Also, perhaps this sentence is meant to read “*research the effects of transportation studies on resources.*”

Page 47, 3rd para. “Lake Clark National Park and *Reserve*.” Change “Reserve” to “Preserve.”

Page 63, Table 23 Prioritized Needs, Strategies, and Cost Estimations, Mobility. There is currently a need for ATV/ORV trail maintenance and improvements as well as access management plans. We request that the table identify a strategy and cost estimate for ATV/ORV trail maintenance and improvements.

Page 63, Table 23 Prioritized Needs, Strategies, and Cost Estimations, Resource Protection. Since transportation studies have a negligible effect on resources, we recommend replacing this priority with improving ATV/ORV trails where they traverse wetlands.

Appendix B, Page 200, Figure 3. Shows AMHS service to Seward. AMHS no longer serves Seward.

Fish and Wildlife Service Region 7 Long Range Transportation Plan

General observations:

The State agrees with the FWS drop-down plan's emphasis on cooperative transportation planning, as it benefits the system as a whole. The plan states that FWS desires a planning process that involves partner agencies (federal, state, and local) that is consistent with State and local transportation planning processes, and that clearly defines and offers opportunities for public input. It further provides that the key objective of such planning process is to develop and maintain a coordinated transportation system for public use, ranging from ferries to vehicle access, summer and winter trails, airports and landing strips, and parking lots.

The State is concerned with the plan's selective application of ANILCA access provisions to subsistence use only. As ANILCA established or redesignated the very lands managed by the Service, the other access provisions in ANILCA cannot be set aside by the Service in policy or otherwise. The State recognizes that transportation access is perceived by some as incompatible with the mission of FWS land management, and yet that very mission is dependent on transportation for its successful execution. We encourage the Service's continued exploration and cooperative development of transportation options that benefit both the public and the agency's mission.

The Figure 1 map very starkly shows how much of USFWS land is not directly accessible by road or waterway. Aviation would seem to naturally have a larger role in transportation considerations, and should receive greater emphasis in this plan.

Page 7, Figure 1. Map shows a ferry terminal and ferry route to Seward. AMHS no longer serves Seward.

Page 9, 1.3 Plan Purposes. One of the plan purposes is "Suggestions for decommissioning roads." Decommissioning roads should not be a main purpose, but rather should be one of the tools employed to meet other management priorities. Given that there are very few roads in the refuge system in Alaska, we question the need to decommission roads at all.

Page 11, Goal 3. Why is this goal restricted to fulfilling the Service’s ANILCA obligations as they relate to only *subsistence use and access*? Other ANILCA access provisions are equally important, such as those found in Sections 1002, 1110, 1310, 1315 and 1316. We suggest the following rewrites,

Goal 3. Fulfill the Service’s Alaska National Interest Lands Conservation Act (ANILCA) of 1980 obligations. For example, as they relate to access or subsistence ~~use and access~~.

Objective 2. Consider access, including subsistence access needs when making transportation decisions.

*Objective 3. Document **traditional** uses of off-road vehicles for traditional subsistence activities ~~access~~.*

Page 18. Recommend replace photo of individual unsafely walking on river ice without lifejacket or flotation device.

Page 21, Table 4 Region 7 Transportation Assets by Refuge. Winter trails with markers have not been accounted for on several refuges in this table, including Innoko, Selawik, Togiak, Yukon Flats, and Yukon Delta. In addition, many summer trails exist on Izembek NWR and throughout the Aleutian Islands Unit of the Alaska Maritime Refuge.

Page 36-39 Erosion. The State is encouraged to see that FWS has listed communities with potential erosion in and near refuges, and plans to monitor climate changes in these areas. Climate monitoring information may prove beneficial for future ADOT&PF plans and projects.

Page 44, Table 17 Subsistence. We understand that the information presented here is from Refuge Interviews; however, information related to “Allowable Subsistence Off-road Travel” is missing. We request follow-up interviews to fill in the blank columns for “Traditional Uses” and “Snow Machine.” Traditional Uses, snow machines, and ATVs are all allowed for Subsistence off road travel under Sec. 811 of ANILCA, unless specifically closed by 50 CFR 36.12.(c).

Page 49, Table 19. What is the source for the total number of visitors? The numbers do not comport with other sources for Arctic Refuge, for example. Do these numbers indicate actual visitors to the refuge, or do they indicate visitors to the public information centers in towns outside the refuge?

Page 51 Table 20. The listing of “Gateway Communities” to units is an important determinant of transportation facility importance and is a welcome inclusion. Further development of this information as to what type of facility these gateway communities use as ingress points and the owner of the facility would be helpful to statewide and regional transportation planning efforts. Coordination with these facility owners (whether local, state or federal) is important to the FWS mission, and the value of state facilities to the FWS mission could be beneficial to the State in its project development and scoring efforts.

Page 51 Table 20. Transit is not included for any of the refuges as an alternate mode of access (or on page 55 Table 22, Mobility). For Kenai and Kodiak NWR in particular, partnership with local transit service is an option that could be explored.

Page 52, 3.5.1 Identifying Mobility Needs and Opportunities. We disagree with the premise that refuges need to demonstrate historic airplane crashes to best justify an airstrip. Airstrips should be justifiable based on the known conditions and uses, without having to wait for an accident to happen.

Page 55, Table 22, Mobility. Table discusses access to the refuge, though a more comprehensive view would show that access to many refuges is through state airports (Cold Bay, airports in Buckland, Selawik, Noorvik, Ampler, Kiana, Kobuk, etc.) that provide access gateways, in addition to highways such as the Sterling and Alaska Highways. As applicable, barge and riverine transportation and related facilities should be fully discussed.

Pages 55-57, Table 22 Mobility, Alternative Transportation Opportunities. We question the data in the Alternative Transportation Opportunities column. We have previously noted that winter trails and some summer trails have not been accounted for in several refuges. Throughout Alaska, refuges are responsible for administering 17(b) easements that access the refuges through Native lands. Bikes, including winter biking, and kayaks are allowed transportation opportunities under Sec. 1110 of ANILCA and we request that these allowed uses be acknowledged as opportunities in this table.

Page 63, Table 23, Tetlin NWR, Partnership Examples. Change “Department of Community and Economic Development” to “Alaska Department of Commerce, Community and Economic Development.”

Page 65-70, Funding and Project Selection. The detailed description of transportation funding and allocation is beneficial to understanding FWS funding avenues and project scoring.

Appendix C Kenai National Wildlife Refuge fact sheet. Shows AMHS service and Ferry Terminal in Seward. AMHS no longer serves Seward.

Forest Service Alaska Region Long Range Transportation Plan

Inside Front Cover. The caption for the front cover should be “Alaska Marine Highway System Ferry *Aurora*”

Page IV Acronyms. For LRTP, the word “range” should be capitalized. “WFL” is not consistent with the umbrella plan acronym “WFLHD” (same definition, different acronym).

Page 6, Figure 1. Map incorrectly implies that the AMHS (black dashed line) serves Seward, which it no longer does.

Page 7, Figure 2. Map incorrectly shows Seward as an AMHS ferry terminal and route (it is not) and fails to show Gustavus as a ferry route.

Page 10, Goal 3 Safety, 2nd Strategy. Inclusion of ferry systems in this list seems unrealistic for the agency. Recommend delete.

Page 11, Section 1.7. In the description of Chapter 6, replace “described” with “describes.”

Page 20, 3.4 Other Transportation-Related Assets. The plan states that “forests are generally inaccessible to seaplanes and boats due to a lack of infrastructure,” yet seaplanes and boats are extensively used to access the forest both for administrative and visitor use. Air charter operators frequently use float plane accessible beaches to drop off and pick up passengers. Boaters use improvised anchoring and retrieval systems to leave boats for extended periods in areas without docks. Infrastructure would certainly improve access, but it is inaccurate to state that the forests are generally inaccessible to seaplanes and boats.

Page 21, Section 3.5. “Sixty-two percent” in text does not match graph showing 65% in good or better condition.

Page 22, Figure 5. Shows AMHS service route and a ferry terminal in Seward. AMHS no longer serves Seward.

Page 22, Figure 6. AMHS does provide service to Gustavus, but that is not shown in this figure.

Page 37, Needs and Gaps. This is an appropriate chapter that addresses Alaska-specific concerns to agency national leadership.

Bureau of Land Management Alaska Long Range Transportation Plan

General Observation: The State is encouraged to see access to mining and energy resources included in the Introduction and “Potential Partners” Discussion.

Inside Cover, Photo. This does not promote safety as the bicycle rider is not wearing a helmet.

Page 2, Asset Inventory. We encourage the BLM to retain access to areas currently reached by roads or trails when considering reroutes of roads and trails which are not sustainably located or designed.

Page 6 Figure 1. Indicates an AMHS route into Seward. AMHS no longer serves Seward.

Page 6, Figure 1 BLM-Alaska Planning Areas. Figure 1 lists the “NPRA RMP,” which is incorrect. The planning document for NPR-A is an Integrated Activity Plan, not an RMP.

Page 9, Goal 1. BLM must go through the appropriate closure process to limit or close motorized activities otherwise allowed by ANILCA.

Page 9, Goal 1, Objective 2. “Develop a funding strategy to repair, replace, or close linear transportation assets in poor or fair condition.” What criteria will be used to close roads and trails in poor or fair condition? We question the closure of roads and trails in fair condition. We also request implementing other management actions short of closures.

Page 11, Existing Conditions. The road and trail mileages noted in this section do not align with what the Alaska Department of Natural Resources (ADNR) has on record.

Page 11-12, Section 2.1 Trails, 2nd para. Add “commerce” to user groups included in first sentence. We also suggest including a sentence describing trail access to mining claims. A discussion of trail inventories comparing BLM and State differences would be helpful.

Page 16, 2.5 Water Conveyance. Many of the waterways listed are state navigable waters. We request that the plan acknowledge ownership of navigable waters through application of the Submerged Lands Act and the Alaska Statehood Act.

Page 17, 2.6 ANCSA Section 17(b) Easements. 17(b) airstrip easements are not mentioned in this section and we request they be included.

Page 18, 2.7 Use and Visitation. Please denote the location and length of operation of the public use cabins that are reportedly causing interest in recreational winter travel to increase—are these new public-use cabins?

Page 20, 3.1.1 Land Use Plan Decisions and Considerations, Designation of OHV Management Areas, Closed Areas, 1st paragraph, last two sentences. As previously stated, there are no BLM wilderness areas in Alaska. In addition, Section 811 of ANILCA provides for motorized OHV use, and ANILCA Section 1110 provides for mechanized use in designated wilderness. We request deletion of the last two sentences of the first paragraph and the citation at the bottom of the page.

Except as otherwise provided by law, congressionally designated wilderness areas are statutorily closed to motorized and mechanized use. Routes and modes of travel in these areas need to be identified by BLM.

Page 20, 3.1.1 Land Use Plan Decisions and Considerations, Designation of OHV Management Areas, Open Areas. We question the applicability of the following statement to BLM lands in Alaska, and request the BLM state specifically which lands have had an increase in volume of motorized recreation that led to this policy shift.

“Technological advances in OHVs and the volume of motorized recreation on public lands have required a shift in policy where the designation or retention of large areas open to unregulated cross-country travel is no longer a viable management strategy.”

Page 21, 3.1.1 Land Use Plan Decisions and Considerations, Presidential and Congressional Designations, fourth bullet. As stated earlier, this information is incorrect. There is no BLM-managed designated wilderness in Alaska. Furthermore, ANILCA provisions allow for other means of surface transportation, including bicycles, as well as snowmobiles, motorboat, and airplane use. ANILCA also provides for subsistence OHV use (see ANILCA Section 811). We request deletion of this bullet as it does not apply in Alaska.

- ~~*Wilderness management plans (non motorized and non mechanized trails only⁶ required by the Wilderness Act. Refer to the Wilderness Manual and Handbook Series for supplemental guidance.*~~

Page 23 Revised Statute 2477 Assertions. This should not be the only reference to RS 2477 in the plan. Recommend adding a new section in Chapter 2 Existing Conditions to explain what they are and why they are significant, and add an appendix containing national guidance issued to FLMA's on the topic.

Page 25, 3.2.4 Route Designation Limitations Relating to Wilderness Study Areas. ANILCA provisions provide for mechanized travel and motorized OHV use for subsistence. We request deletion of this section as it does not apply in Alaska.

~~*In WSAs, motorized and mechanized use may be permitted to continue on existing routes identified in the wilderness inventory conducted in support of sections 603 and 202 of the Federal Land Policy and Management Act of 1976. In these cases, final route classification is delayed until Congressional action is taken or a land use plan decision is made to close routes to motorized and mechanized use. Primitive roads and motorized/mechanized trails are not designated and classified as an asset within a WSA. Any motorized/mechanized linear transportation features located within these areas is identified in a transportation inventory as a motorized/mechanized "primitive route."*~~

~~*Primitive routes are not a part of the transportation system, classified as a transportation asset, or entered into the FAMS unless one of the following conditions is met:*~~

- ~~• *The routes are designated as non-motorized and non-mechanized trails.*~~
- ~~• *Congress releases the WSA from Wilderness consideration and the routes are designated.*~~

Page 26, 3.2.5 Route Designation Limitations in Lands with Wilderness Characteristics Designated for Protection. As this plan is written, lands with wilderness characteristics would be managed more restrictively than lands with wilderness character/designated wilderness. We request the following rewrites to align this plan with ANILCA.

~~*Primitive roads and motorized/mechanized trails are not designated and classified as an asset within lands with wilderness characteristics designated for protection in land use plans. Any motorized/mechanized linear transportation feature located within these areas shall be identified in a transportation inventory as a motorized/mechanized "primitive route" unless a land use plan decision is made to close the routes to motorized/ mechanized use. Primitive routes are not part of the transportation system, classified as a transportation asset, or and entered into FAMS, unless one of the following conditions is met:*~~

- ~~• *The routes are designated as nonmotorized and non-mechanized trails.*~~
- ~~• *An RMP decision is made to no longer protect the wilderness characteristics and the routes are designated.*~~

Thank you for your consideration of these comments. We look forward to working with you on future revisions of the LRTP. If you have questions, please contact me at (907) 334-2563.

Sincerely,

A handwritten signature in black ink that reads "Nina Brudie". The signature is written in a cursive, flowing style.

Nina Brudie
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator