



THE STATE
of **ALASKA**
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ANILCA Implementation Program

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Alan E. Watson
Aldo Leopold Wilderness Research Institute
USDA 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 January 31, 2013, regarding Information Collection: Arctic National Wildlife Refuge Recreation Visitor Study -- 2013. 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 upcoming Arctic Refuge Visitor Use Management Plan (VUMP) and Wilderness Stewardship Plan (WSP). We appreciate the efforts extended by the Service to coordinate with the State on development of the survey, both currently and in 2009. Close cooperation is especially important considering state resource agencies have overlapping management responsibilities for resources within the Refuge.

The Alaska National Interest Lands Conservation Act (ANILCA) established the Arctic Refuge and the Mollie Beattie Wilderness Area, and as such, both are subject to the unique provisions of ANILCA. However, the Federal Register Notice highlights direction from the Wilderness Act and only references ANILCA in the context of providing recreation experiences. To ensure the integrity of the survey and its subsequent analysis, the study plan must include a full discussion of how ANILCA amends the Wilderness Act in Alaska, including uses not generally allowed in designated wilderness elsewhere, such as motorized access for subsistence and traditional activities.

The following comments are in response to the issues identified in the Federal Register Notice.

- (1) Whether this collection of information is necessary for the stated purposes and the proper performance of the functions of the agency, including whether the information will have practical or scientific utility.**

Need for information

The last OMB-approved visitor survey was conducted in 1977 for the Arctic National Wildlife Range, prior to the establishment of the Arctic National Wildlife Refuge and designation of the Mollie Beattie Wilderness. A subsequent survey was conducted by Aldo Leopold Wilderness Research Institute in 2008; however, it did not receive OMB approval. Further, the 2008 survey did not obtain a representative sample; was disproportionately focused on wilderness experiential values over experiences and activities supported by the Refuge Improvement Act and ANILCA; and lacked rigorous, objective data analysis. While we agree information is needed to inform management planning, and support collection of information in the context of an objective, representative, recreation-based study, we caution the Service about repeating flaws in the 2008 survey.

In addition, as expressed in our comments on the proposed visitor use survey in 2009, we remain concerned about the survey's ability to capture all recreational users of the refuge if the survey is limited to "*non-local recreation visitors*" and "*non-local, non-subsistence users*." In response, in a letter dated December 10, 2009, the Refuge Manager outlined the reasons for not including local residents as part of this survey, as well as describing efforts that would be made to obtain interests and concerns of local residents. However, neither the current Federal Register Notice nor Supporting Statement A outline alternative methods to obtain local interests and concerns, or explain how information obtained from local residents would be incorporated into the data stored and analyzed at the Aldo Leopold Wilderness Research Institute. Without local use information, the survey results may be skewed and lack data on use demographics necessary for refuge planning efforts.

Practical utility of applying wilderness research to the entire refuge

Although less than half the refuge is designated wilderness, the Federal Register Notice emphasizes the Wilderness Act and wilderness-related experiences. The notice further states "*Agency personnel use the collected information to ensure visitor recreational activity does not harm the natural resources of the refuge and to **guarantee the protection of wilderness-type recreation experiences***" (Emphasis added). Given this intent, we are concerned the survey will place too great an emphasis on wilderness values. The survey must ensure the priority public uses of the refuge system, as required through the Refuge Improvement Act, and the Refuge's ANILCA purposes and uses are appropriately addressed. In particular, the survey must be structured to gather information on all types of visitor activities, including the ability for respondents to provide site-specific information.

Practical utility of comparing 1977 and 2013 surveys

The Federal Register notice states "*The Agency intent is to compare 2013's recorded visitor responses to the previous survey responses, dated in 1977 before Refuge status and Wilderness designation.*" The 1977 survey was a vigorous survey well-founded on social science principles. We support comparing the 2013 responses to the 1977 survey responses, provided the surveys are similar.

The description in the Federal Register notice gives the impression that the Service has not fully consulted the 1977 survey. Survey questions regarding encounters and information sources used to plan the trip were included in the 1977 survey yet the Federal Register notice states the scope of the 2013 survey will be expanded to include that same information.

...to include visitor feedback to understand major dimensions of visitor experiences there and factors that influence those experiences. Potential factors of influence could include encounters with other visitors, subsistence users, researchers, and agency personnel, and information sources used to plan the trip.

In addition, the objectives for the 2013 survey appear similar to those identified in the flawed 2008 survey and several objectives found in the 1977 survey have been omitted, including: obtain a representative sample of visitors; compare sampled hunters and non-hunters with regard to activities, attitudes and management preference; determine socio-economic characteristics of sampled visitors; determine degree of trip satisfaction. To maintain an objective continuity between the two studies, these or similar objectives need to be incorporated into the 2013 study.

The practical utility of direct comparisons of visitor use trends between the 1977 and 2013 surveys will also be affected by the significant increase in size of the Refuge following passage of ANILCA. Any comparison of visitor use must be framed in the context of the *Arctic Refuge*, which encompasses an area more than double that of the *Arctic Range*. In addition, expansion of the Refuge's western boundary made ground-based access to the Refuge from the Dalton Highway possible, which altered the available recreation opportunities.

Lastly, the 1977 survey included questions to obtain visitor's opinions on access restrictions. However, in 1980, ANILCA established the Arctic National Wildlife Refuge and included provisions that protected various uses and modes of access for subsistence and traditional activities, including within designated wilderness. The process and justification necessary to restrict ANILCA protected uses and access are addressed in ANILCA implementing regulations at 50 CFR Part 36 and 43 CFR Part 36. Therefore, any survey questions intended to determine the "appropriateness" or how a visitor "feels" about these uses and access are irrelevant and must be removed from the 2013 survey.

(2) the accuracy of the Agency's estimate of the burden of the collection of information, including the validity of the methodology and assumptions used;

Burden of collecting information from independent visitors not identified

The notice states "*Visitors will be contacted as they enter the Refuge, or upon exit...*," yet the supporting statements do not discuss other methods of contacting visitors (including local users) who enter the refuge independently by foot, boat, or plane. A major change since the 1977 survey is the expansion of the Refuge boundary westward to within walking and boating distance from the Dalton Highway. Collecting information from these visitors, as well as other independent visitors accessing the Refuge via aircraft is important; however, it is unclear whether doing so is included in the burden estimate. While the burden from collecting information from independent visitors is likely higher than collecting information from organized commercial visitors, the value of obtaining a representative sample of all types of

visitors would justify the additional burden. We strongly support an organized and meaningful effort to distribute the survey to independent visitors and recommend the burden estimate factor in the collection of this information.

(3) ways to enhance the quality, utility, and clarity of the information to be collected;

Enhance the quality of information through improved distribution methods

The Federal Register notice references contacting visitors upon entering or exiting the Refuge and Supporting Statement A includes hunting licenses as an additional source for obtaining contact information. While the additional hunting license source is useful, we are concerned that the limited 2013 survey distribution methods will again exclude independent visitors, as occurred with the 2008 survey, which relied upon the same contact methods currently proposed - air taxi pilots and registration cards at visitor centers and kiosks in places independent visitors may not visit. This concern is supported in the 2008 study report “...*the apparently low rate of registration raises concern about the representativeness of the study data*” and “...*we can not attach any probability or precision to how well the statistics actually estimate the population parameters.*” In particular, we are concerned the 2008 survey was not representative of hunters and, as discussed in the next section, the survey schedule may preclude obtaining responses from hunters. To ensure a representative sample, we recommend additional survey distribution methods, including those used in the 1977 survey.

In addition to relying on voluntary sign-up kiosks at regional transportation hubs and air taxi services to distribute postcards as in the 2008 visitor study and 2013 study plan, the 1977 survey used data from the Alaska Department of Fish and Game (ADF&G) to contact visitors who hunted on the Range. Local air traffic radio transmissions and observation of aircraft tail numbers during fly-over surveys also resulted in visitor contacts and should be included as a means of contact in the updated survey. Voluntary sign-up kiosks were used at the Kaktovik Post Office and at airstrips at Barter Island, Fairbanks, and Fort Yukon. Other contact methods included responding to letters written to the Service and contacting visitors at Kaktovik and Fort Yukon from June to the middle of September. In addition to the 1977 distribution methods, we recommend establishing registration stations at the Galbraith Lake and Happy Valley airstrips, and the Atigun River put-in on the Dalton Highway. We also recommend considering establishing kiosks at common entry points along the Dalton Highway, notices at hub airports, and contacts through private pilot clubs, sportsman’s groups and retailers, and web forums dedicated to activities such as hunting, fishing, and boating.

Enhance the quality of information through appropriate survey timing

To ensure a representative sample, we request that the survey schedule accommodate the timeframe necessary to contact hunters. Most hunting activities on the Refuge occur during the latter part of the sampling period and ADF&G-derived hunter contact information may not be available until after the end of the State of Alaska regulatory year for hunting (June 30, 2014). If the survey schedule cannot accommodate including 2013 hunters, we request researchers instead contact hunters from the 2012 regulatory year.

Clarity of information collected in regards to the 2008 Survey

Even though it was not OMB approved, the 2008 survey should still be acknowledged in the survey plan. The Federal Register notice states “*Data collected in this information collection are not available from other sources and have not been collected since 1977.*” Supporting Statement A states “*most areas have never had a study of visitor preferences, characteristics, and behavior conducted,*” and Supporting Statement B indicates the last year the number of commercial visitors was estimated was 2004. While we have concerns regarding the methods and format used for the 2008 survey, some limited information regarding simple use numbers may prove useful, and anecdotal information gathered may help inform the development of survey questions.

Enhance the utility and clarity of information regarding visitors versus workers

The 1977 study excluded the responses from visitors who were on the Range for work purposes, while the 2008 study included responses from all visitors, including guides and those who were there for work purposes. In addition, the analysis for the 2008 visitor study did not separate the results of recreational visitors from working visitors, who comprised almost ten percent of the total visitors. We request the 2013 survey and final report identify and separate the responses of all individuals working on the Refuge, including guides, researchers, and Service employees, from recreational visitors’ responses.

Enhance the utility of information regarding socioeconomics/demographics

Supporting Statement A clearly states the importance of including household income and size in order to understand “*the segment of society being served by these federal services,*” and notes that OMB recommends its inclusion. We support obtaining this information for the reasons cited in Supporting Statement A, as well as for consistency with Objective 4 from the 1977 survey.

Enhance the utility of information regarding user group preferences

The 1977 study found distinctly different attitudes towards wildlife, wilderness, and management preferences between hunters and non-hunters visiting the Range. We request the 2013 survey similarly analyze whether different attitudes continue to exist between these or other predominant user groups. This information would be useful when developing management strategies in the VUMP and WSP to better manage for all user groups’ expectations.

Enhance the quality, utility, and clarity of information regarding areas used by visitors

The 1977 survey provided a map and asked respondents to mark their route and campsites, along with locations where trash was found. To aid in the development of the VUMP and WSP, we recommend the 2013 survey instrument include a similar opportunity for respondents to provide this level of detailed information.

(4) ways to minimize the burden of the collection of information on respondents, including the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

On-line survey

The Federal Register Notice indicates that respondents will be able to complete the survey on-line. Respondents to the 2008 survey complained that the survey could not be completed without installing Adobe Acrobat Reader. The need to download software unnecessarily increases the burden on respondents. We therefore recommend the on-line version of the survey not require installation of software.

Remove repetition and streamline for utility

To minimize the burden on respondents, we recommend repetitive questions be removed or combined. To further streamline the survey, we recommend prioritizing those questions that have practical utility for refuge management.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions. We look forward to continuing to work with you as the survey progresses.

Sincerely

/ss/

Susan Magee
ANILCA Program Coordinator

cc: Jeff Brooks, USFWS Alaska Region

