



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

## ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT & PERMITTING

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Attn: Desk Officer for the DOI  
Office of Management and Budget  
Office of Information and Regulatory Affairs

Re: 1024-SOUND

Dear Sir/Madam,

The State of Alaska reviewed the National Park Service's (Service) Proposed Information Collection; Comment Request: NPS Study of Value of Natural Sounds: A Pilot Study (78 FR 154, pgs 48715-48716). The following comments represent the consolidated views of the State's resource agencies.

Alaska's park units are expansive, remote, and receive relatively little visitation in comparison with lower 48 park units; however, the focus of the survey appears to be geared toward lower 48 parks with heavy recreational and commercial use. The original February 4, 2011 Federal Register Notice stated that: "...the NPS must be sensitive to human activity in parks that can impact the natural landscape. An area of growing concern has been the increasing presence of human-caused sounds at the national parks, including sounds from road vehicles, aircraft, and construction and mining equipment."

In addition to the Service's Organic Act and other related policies and regulations, park units in Alaska are managed in accordance with provisions of the Alaska National Interest Lands Conservation Act (ANILCA), which provides for the use of snow machines, airplanes, and motorboats to access Alaska's remote park units and to provide for travel to and from villages and homesites. Given the expansive size of most of the park units, which envelope numerous state and private inholdings and in some instances entire communities, ANILCA also guaranteed access to inholdings and "*assures adequate and feasible access for economic and other purposes*" (emphasis added). ANILCA also allows for the use of motorized and mechanized equipment directly related to hunting, fishing, and trapping, the harvest of timber for subsistence use, and other activities essential to the rural Alaskan lifestyle...

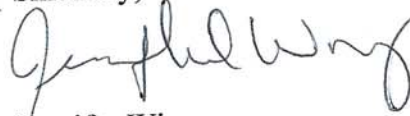
If the Service intends to administer the final survey in Alaska, focus groups must also be conducted in Alaska's cities and remote communities and survey questions must be tailored to take into consideration Alaska's unique conditions and the statutory provisions of ANILCA that provide for noise-generating uses and activities in Alaska park units.

In addition, the following comments are provided to address the quality, utility, and clarity of the information being collected, particularly as it would apply to parks in Alaska:

- We recommend the sound clips be included for both for the on-site survey and the general population survey. The sound clips should reflect the noise levels described in the survey and the actual noise conditions found in park frontcountry and backcountry areas.
- The on-site visitor survey questions seem to not distinguish between maximum volume and length of time. It is unclear how the survey will differentiate the extent to which volume and percentage of time are important to respondents.
- The inclusion of both nighttime and daytime in both the frontcountry and backcountry for questions where conditions only vary for one or the other is unnecessarily confusing. This is an issue in both the on-site and the general population surveys.
- It is unclear why audio clips cannot also be used for the general population surveys, which would enable the two survey instruments to be the same. No explanation was provided as to why the two groups require different survey instruments. In addition, it is not apparent why the scenarios in the general population survey are “*described by a change in the amount of your household’s federal income taxes*” (pg. 3 and in each of the exercises). A change in park fee or of a per person trip cost seem more relevant.
- If the computer tablet survey is used in Alaska, we recommend modifying several of the questions.
  - For question eleven, we recommend including lists of natural features instead of trails for applicable Alaska park units. Many of Alaska park units have very limited trails and hiking routes often do not follow trails. Instead, visitors follow game trails through river valleys or choose their own route over mountain passes.
  - For questions twelve and thirteen, we request that the list of activities be appropriate for individual parks and preserves, as many parks in Alaska are not road accessible.
  - For surveys administered in Alaska, we recommend questions related to air space be deleted or modified to reflect that many parks in Alaska are not road accessible and airplanes are an essential mode of transportation, allowed under ANILCA.
  - When listing attributes relevant to a particular Alaska park unit, please note that subsistence hunters in the parks and general hunters in the preserves are often seeking quality hunting opportunities, airstrips, and floatplane accessible lakes.

Thank you for the opportunity and consideration of our comments. Please contact me at (907) 334-2563 or at [jennifer.wing@alaska.gov](mailto:jennifer.wing@alaska.gov) if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Wing".

Jennifer Wing  
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator