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**NPS Wilderness Recommendations:
The State of Alaska's Perspective**

The State appreciates the opportunity to participate and contribute our ideas in this informal setting. This wilderness forum is a good idea, especially because it is occurring early in the process. I understand the purpose of this panel presentation is to conduct a qualitative assessment of existing National Park Service (NPS) wilderness and to discuss the implications of additional wilderness in light of the requirements of ANILCA Section 1317.

As you might imagine, the State's interests are complex. In its support of the ANILCA compromise legislation, the State recognized the role that wilderness can play for selected national interest lands in Alaska. Similarly, as a key part of that compromise, the State supports the special provisions of ANILCA which specifically tailor wilderness to Alaska conditions. The State agencies represent a wide range of Alaska public interests. Various departments and their subdivisions seek to protect opportunities for recreation, mining and other development interests, clean air and water, healthy fish and wildlife populations, subsistence uses, etc. consistent with the compromise ANILCA language. Consequently our statements and policies will reflect an integration of these interests. This is achieved through an effective, if sometimes time consuming, consensus building process.

With that background I can convey that the State has a keen interest in any additional wilderness proposals. A review of recent wilderness designations may not, however, provide enough information to assess the merits of wilderness. It is too soon to judge some of the more far-reaching effects of the existing designations, be they "positive" or "negative." Something more is needed.

To get at the question regarding the implications of additional wilderness, what the State feels strongly is needed is that this basic question must first be addressed by the NPS. Thus today we will indicate what steps should be taken by NPS prior to completing wilderness recommendations as required by ANILCA Section 1317.

While wilderness is, in part, merely another land use designation, it is also a potent concept or management philosophy which conjures up a variety of responses depending on one's point of view and perception of what sort of management accompanies a wilderness designation. How it is measured and judged is, and will be, based largely on how it is perceived. In order to rationally assess wilderness in Alaska the public and the State need to know what the NPS envisions for areas with a wilderness designation. The NPS therefore has the responsibility to clearly and explicitly outline what wilderness means for Alaska and Alaskans. Discussion and review of suitability criteria and specific application will only be productive and meaningful after a common understanding of the implications of wilderness has been developed. Without that common understanding, the wilderness review process will be crippled from the beginning by confusion and different perceptions of the situation.

ANILCA clearly modified the application of the Wilderness Act of 1964 in Alaska. Congress imposed modifications because many

aspects of "lower 48" wilderness, if strictly applied in Alaska, would wreck havoc on rural Alaska. As land managers for wilderness parklands in this State, it is your responsibility to clearly define what this means, i.e. how wilderness is being and will be treated in Alaska. Therefore our first and foremost recommendation is that NPS focus its immediate attention on an analysis that clearly states how wilderness affects management of parklands. This analysis or policy paper should address, among other things, what effects, if any, wilderness will have on the following issues:

Access

- for subsistence,
- to inholdings,
- off-road vehicle use,
- the Title XI process,
- the Section 201(b) corridor (GAAR)
- 17(b) easements
- RS 2477 rights-of-way
- other rights-of-way

Fish and wildlife management,
Use of cabins and temporary facilities,
Use and management of watercolumns,
Federal reserve water rights, and the full spectrum of other management concerns.

As needed, the analysis should make appropriate distinctions between the effects of a suitability determination, an NPS recommendation, and/or a congressional designation. This should not be too difficult to do since the NPS has already begun managing and interpreting wilderness management in areas already designated. The NPS should review the implementation strategies

it already is following on the above issues, and document these policies for the public. This would provide an indication to the public and the State specifically how the NPS interprets its wilderness mandates and management.

Wilderness is permanent. Therefore, the project you are about to begin will not be repeated or revised and, once completed, will set directions that are unlikely to be significantly altered. It is thus critical that the management strategies associated with wilderness be detailed prior to any discussion of suitability criteria or their application to specific areas. Therefore, we urge you to facilitate a clear public understanding of the implications of your work prior to attempting to make recommendations which are intended to be in the best interest of the public consistent with Congressional intent.

Once the common understandings have been developed, clear criteria should be developed for what land, if any, may be suitable for additional wilderness designation. Placing a priority on the criteria itself over application to specific acreage will greatly enhance the efficiency of your overall task.

One final point, we urge the NPS to spell out a wilderness review process that details the steps that will be taken and how public input will be sought and utilized. The process should incorporate a formal or informal mechanism for getting early public and agency involvement on wilderness management intent and subsequent criteria development. A good public involvement process will promote better public trust and understanding of your mandates and objectives; and will give you the benefit of the wealth of information and local knowledge that is collectively held by State agencies and the public. Clear thinking at this early stage of the process is critical in that it will minimize frustration down the road such as we have all

experienced in the GMP process. Under the urgency to get things going, this can be difficult. However as much thought and dialogue as possible (like this forum) should go into discussing and inventing the wheel beforehand rather than improvising and reacting as we go. There is much to learn from the GMP process, and we hope you will take the time to listen to those who have been involved with it and tailor your process to allow for more effective participation and public involvement.

That summarizes the key points the State would like considered as you embark on your wilderness suitability studies. We look forward to reviewing the policy analysis requested above as a starting point in this process. We also look forward to working with you on the subsequent development of the criteria used in determining wilderness recommendations. Various State agency staff are available to discuss any aspect of the process informally any at time. Thank you once again for the opportunity to provide these thoughts.