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**BILL SHEFFIELD, GOVERNOR**

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November 24, 1986

Mr. Boyd Evison  
Regional Director  
National Park Service  
2525 Gambell Street  
Anchorage, AK 99503-2892

Dear Mr. *Boyd* Evison:

The State of Alaska has completed its review and analysis of National Park Service (NPS) materials prepared during the **scoping phase of the ANILCA-mandated Section 1317 wilderness study** process. We urge you to consider the following recommendations as you and your staff work toward development of a full range of reasonable wilderness alternatives. This letter also reiterates some of the key suggestions and issues raised by state agency representatives at the scoping meetings held in September.

In general, the state is pleased with the NPS staff effort to collect the views of the public and interested agencies in this preliminary scoping phase. The time invested in public education and the collection of valuable site-specific information at this stage will certainly prove beneficial in the long run. In particular, we are pleased that NPS has worked this past year to define wilderness management and allowable uses in wilderness. We strongly urge that NPS make this information more widely available, even if the analysis is still in draft, in the continuing effort to further refine the definition and educate managers and the public alike.

While Congress will ultimately decide whether additional areas will be designated as wilderness, the NPS should prepare the best possible background data and analysis of each wilderness alternative. From this perspective, we have some suggestions about the overall wilderness study and environmental impact statement (EIS) process.

The state urges the NPS to be as comprehensive and detailed as possible in its identification and analysis of the impacts of wilderness. We are concerned that sufficient time is not being allotted to this effort as the draft EISs are prepared. Our understanding is that the initial drafting of the thirteen draft EISs is scheduled to be accomplished during a minimum 4 or 5 month time period. Based on the state's own experience with the development of major planning documents and review of recent draft NPS General Management Plans (GMPs), we are concerned that

inadequate issue development in the draft EISs will create more work in the development of the final recommendations and EIS. Thus the state recommends that the planning schedule be relaxed slightly to insure that reasonable, substantiated alternatives are developed and that they are accompanied by sufficient analysis.

The state also encourages the NPS to provide all parties who participated in the GMP planning process the opportunity to review the draft wilderness recommendations. We suggest that all participants receive either the recommendations themselves or a notice of the future availability of all thirteen documents a month or so in advance of their publication with an attached response form that can be returned to NPS which indicates what document(s) are requested for review. This will help insure that interested parties will be able to utilize the full comment period for review. Given the importance and complexity of wilderness issues in Alaska, we commend NPS' decision to set aside a 120-day comment period on the draft recommendations.

The remainder of the state's comments address the specific content of the wilderness recommendations and the accompanying EISs. They are organized as follows: General Information; Issues and Analysis; Development of the Alternatives; and Maps.

#### General Information

The state requests that each of the documents contain an explanation of the purpose of the wilderness study, including the congressional intent behind Section 1317 of the Alaska National Interest Lands Conservation Act (ANILCA); a discussion of the wilderness study/EIS process; a discussion of Assistant Secretary Horn's September 30, 1986 policy direction; and an analysis of how the NPS wilderness recommendations meet the guidelines provided by ANILCA and Assistant Secretary Horn. The documents should also identify the steps that will be taken to forward recommendations from NPS to Congress, including anticipated timeframes. This discussion would apply to all NPS units, so it would be appropriate to include generic language in all documents to facilitate public review and understanding of NPS intent.

As stressed in the state's January position paper regarding the wilderness process, it is essential that the documents describe wilderness management in Alaska and indicate how management of recommended wilderness differs from management of designated wilderness, if such differences exist, and at what point wilderness management takes effect. The documents should also describe how a wilderness recommendation and/or designation will affect NPS discretionary decisions, based in part on an analysis of how existing designated wilderness currently affects decision-

making. This discussion should also distinguish, as appropriate, between management of wilderness preserve and wilderness park. As the state noted in January and in the recent scoping meetings, any deliberations regarding wilderness are unproductive without a common understanding of what wilderness means.

The state further recommends that the documents discuss the possibility that NPS may want to recommend to Congress that any wilderness designations in Alaska be accompanied by a clarification of Congressional intent regarding the following points:

The definition of "traditional" as it appears in ANILCA, especially for cabin use, motorized access, recreational uses and commercial recreation activities;

The use of the "compatibility" or "consistency" concepts in reference to uses or activities which are allowed or not allowed (e.g. land protection plans, access provisions which are dependent on "consistency with the purposes of the unit".);

The extent to which the Wilderness Act has been superceded or modified by ANILCA.

Such Congressional clarification could assist in resolving management questions in those cases where existing legislative history is either lacking, overly broad or potentially conflicting.

### Issues and Analysis

The state requests that the draft EISs address the following issues, many of which were included in our January 1986 statement. In addition to identifying the legal differences between how these issues are addressed in wilderness or non-wilderness, it is important to also identify how NPS will exercise it's discretion differently.

#### Access

- for subsistence
- for recreation
- for commercial uses (e.g. guides and outfitters)
- to inholdings
- off-road vehicle use
- aircraft use
- the Title XI process
- the Section 201(b) corridor
- 17(b) easements
- RS 2477 rights-of-way
- other transportation corridors or rights-of-way

Opportunities for developed recreation/visitor use facilities  
Fish and wildlife management techniques  
Use of cabins and temporary facilities  
Use of mechanized equipment (e.g generators, chainsaws)  
Commercial uses (outfitters and guides)  
Commercial fishing support facilities and activities, as appropriate  
Use and management of watercolumns  
Land exchanges  
Federal reserve water rights  
Use of non-federal interests

Once the impacts of wilderness have been identified and analyzed, we suggest that the draft EISs elaborate on how the preferred alternative was selected. The state suggests the following approach as a vehicle for addressing and documenting the decision-making process.

- I. For each alternative the draft EIS should address:
  - A. The goals or purposes the NPS intends to accomplish through this alternative.
  - B. How this alternative meets these goals. In particular, how the wilderness or non-wilderness status of individual parcels meet the goals. This analysis should be as detailed and site-specific as possible. For "sets" of alternatives, such as the "no action" alternative which are essentially the same for each unit, consistent criteria should be provided which links them to their common goals.
  - C. How this alternative meets the intent of
    - ANILCA and the Wilderness Act
    - Assistant Secretary Horn's policy direction
    - General Management Plans(The state is particularly interested in reviewing the latter two analyses.)
  - D. The benefits of this alternative.
  - E. The drawbacks (e.g. foreclosing options) associated with this alternative.
- II. Selection of a preferred alternative would be facilitated by answers to the following questions:
  - A. Indicate compelling reasons, if any, to designate new lands as wilderness.

- B. Indicate compelling reasons not to designate new lands as wilderness?
- C. Are there alternative management techniques which would provide for the benefits of designation without, or with fewer, drawbacks?
- D. If wilderness designation is the best way to meet overall NPS goals, which alternative provides the greatest benefit with the least detrimental impacts?

Since it appears that one of the greatest impacts of wilderness may be on NPS' ability to construct visitor facilities, it is particularly important to discuss facilities-related options which would be precluded by a wilderness designations. Most of the GMPs recognize that it is premature to decide where new facilities would be needed or desirable and recommend that options for development be considered in the future, e.g. through future studies and possible GMP revisions. Because wilderness is not a flexible land use classification, it is critical to address the need to preserve options for the future. Thus the draft EISs should explain how the wilderness recommendations are consistent with GMPs' intent regarding future visitor facility needs.

#### Development of the Alternatives

In order to be consistent with Assistant Secretary Horn's policy direction for future NPS wilderness recommendations, it appears necessary for the NPS to develop additional alternatives for most, if not all, of the units. With a few exceptions, most of the preliminary alternatives look like variations of an all-or-nothing theme. More emphasis should be placed on identifying alternatives with smaller, more discreet wilderness proposals. In addition, these "middle" alternatives will help meet the National Environmental Policy Act requirement that a full range of alternatives be presented.

As expressed at the September scoping meeting, the state also encourages NPS to consider boundary adjustments to existing wilderness. As noted in the Horn memo, certain adjustments would make "boundaries conform more closely to natural features" and/or "facilitate resource management and protection." Through the GMP review process and the state's technical review of the "final draft" legal descriptions of ANILCA park units (see correspondence from the state dated August 4, 1986), it has become apparent that there are numerous site-specific problems that, if not addressed, will complicate wilderness management or prolong jurisdictional disputes.

The state previously requested that deletions of existing wilderness (beyond those that could be accomplished through minor boundary adjustments) also be considered in this process. In particular, the 1984 proposal reviewed by the NPS, state, commercial fishermen, tour boat operators and other interest groups to delete certain navigable waters from wilderness in the Glacier Bay National Park and Preserve illustrates that Congress' initial designations can, in fact, be improved upon in specific instances. The state recognizes that this process was not mandated to seek recommendations for numerous or wholesale deletions of congressionally-designated wilderness. However such deletions may also be appropriate elsewhere.

We also request that the alternatives specifically identify which pending non-federal lands (state selections, native selections, mining claims, etc.) will be recommended for wilderness in the event that they are retained in federal ownership and provide justification for these recommendations. We also recommend that possible land exchanges be addressed and that areas with high potential for a land exchange be excluded from one or more alternative.

In order to fully address the need for future transportation needs within the National Park System, the state requests that at least one of the alternatives that contain wilderness recommendations exclude all potential transportation corridors or major access routes, including those routes that have been identified by the state as possible Revised Statute (RS) 2477 rights-of-way. The general discussion of access should address how wilderness would affect the management of these corridors, routes and possible rights-of-way, and vice versa.

### Maps

The state urges that maps included in the wilderness recommendation documents rely on the most recently drawn boundaries rather than the original 1:250,000 scale USGS maps which contain some major inaccuracies. As noted above, the state has some remaining problems with the current boundary descriptions, however they are more accurate than the USGS maps.

We also suggest that the scale and information shown on the maps be sufficiently detailed to accurately portray wilderness recommendations. Line work and the identification of geographic features should be as detailed as possible. Wherever possible, it would also be desirable to reference place names that are used elsewhere in the documents on the maps.

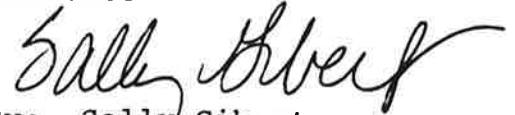
Further, in the interest of clarity, we suggest that all non-federal interests be clearly identified on all maps. If individual parcels are too small, their location could be shown

on an inset map or indicated by a symbol with an accompanying description or table which specifically addresses these parcels. The documents need to be as clear as possible about which lands are recommended and which are not.

On behalf of state agencies, we appreciate the opportunity to provide these general comments on the NPS wilderness recommendation process. We will be forwarding additional site-specific and/or technical questions and comments under separate cover in the next few days. If we may be of assistance in clarifying these comments and recommendations, please do not hesitate to call this office.

Sincerely,

Robert L. Grogan  
Director



By: Sally Gibert  
State CSW Coordinator

cc: Senator Rick Halford, CACFA, Fairbanks  
Commissioner Collinsworth, DFG, Juneau  
Commissioner Knapp, DOTPF, Juneau  
Commissioner Ross, DEC, Juneau  
Commissioner Wunnicke, DNR, Juneau  
Mr. John Katz, Office of the Governor, Washington, D.C.  
Ms. Molly McCammon, Office of the Governor, Juneau

03/LT

## Title: NPS Wilderness Scoping

- [1272] Mr. Mike Abbott, Resource Development Council, Anchorage
- [1075] The Honorable Albert P. Adams, Kotzebue
- [1304] Ms. Susan Alexander, Anchorage
- [1311] Mr. Bill Allen, Fairbanks
- [1312] Mr. James Barkeley, Esq., Anchorage
- [1037] Ms. Joyce Beelman, Department of Environmental Conservation, Fairbanks
- [1] Mr. Jay Bergstrand, Department of Transportation and Public Facilities, Anchorage
- [1335] The Honorable John Binkley, Bethel
- [1079] The Honorable Bette M. Cato, Valdez
- [1327] The Honorable John B Coghill, Nenana
- [249] Mr. Norman A. Cohen, Department of Fish and Game, Juneau
- [1292] Mr. Frederick O. Eastaugh, Juneau
- [1293] Mr. Bart Englishoe, Anchorage
- [1116] The Honorable Bettye Fahrenkamp, Fairbanks
- [1294] Dr. Hugh B. Fate, Jr., Fairbanks
- [1118] The Honorable Frank R. Ferguson, Kotzebue
- [203] Mr. Peter Freer, Department of Community and Regional Affairs, Juneau
- [201] Mr. John Galea, Ketchikan
- [1263] Mr. Joseph W. Geldhof, Department of Law, Juneau
- [359] Ms. Lennie Gorsuch, Juneau Capitol Information Group
- [944] Mr. Clay Hardy, U.S. Department of Interior, Anchorage
- [1243] Mr. Robert D. Heath, Alaska Power Authority, Anchorage
- [1244] Mr. Robert Henderson, Department of Public Safety, Anchorage
- [1091] The Honorable Adelheid Herrmann, Naknek
- [1384] The Honorable Lyman Hoffman, Bethel
- [1247] Mr. Steve Hole, Department of Education, Anchorage
- [1271] Ms. Sharon Jean, Alaska Land Use Advisors, Soldotna
- [1297] Mr. Arthur Kennedy, Anchorage
- [1298] Dr. John Choon Kim, School of Business & Pub. Affairs University of Alaska, Anchorage
- [1270] Mr. Larry Kimball, Alaska Federation of Natives, Anchorage
- [1275] Mr. Jim Kowalsky, Tanana Chiefs Conference, Fairbanks
- [1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
- [48] Ms. Janie Leask, Anchorage
- [1258] Mr. Craig Lindh, Juneau Office of Management & Budget
- [946] Mr. Ron McCoy, Alaska Land Use Council, Anchorage
- [1269] Mr. Mike Mitchell, Alaska State Library, Juneau
- [594] Ms. Mary Nordale, Commissioner, Department of Revenue, Juneau
- [1290] Ms. Debra Oylear, Division of Governmental Coordination, Anchorage
- [595] Major General Edward G. Pagano, Department of Military Affairs, Anchorage
- [501] Ms. Eileen Plate, Department of Labor, Juneau
- [1279] Mr. Gerald Rafson, Ak. Dept. of Transportation & Public Facilities, Fairbanks
- [1273] Mr. Randy Rogers, Northern Alaska Environmental Center, Fairbanks
- [1299] Mr. Wayne Ross, Anchorage
- [263] Ms. Laura Schroeder, Dillingham
- [1372] Ms. Marianne See, Department of Fish and Game Division of Habitat, Anchorage
- [1378] Mr. Thyas Shaub, Department of Commerce and Economic Dev. Minerals & Forest Products, Juneau
- [233] Mr. Steve Sorensen, Juneau
- [89] Ms. Michelle Stearns, Palmer
- [60] Mr. Jim Stratton, Juneau



Title: NPS Wilderness Scoping

- [486] Mr. Robert I. Swetnam, Anchorage
- [1242] Mr. Ike Waits, Department of Community & Regional Affairs, Anchorage
- [1239] Mr. Rob Walkinshaw, Department of Natural Resources, Anchorage
- [1371] The Honorable Kay Wallis, Fort Yukon
- [940] Mr. Vernon R. Wiggins, Anchorage
- [1240] Mr. Dan Wilkerson, Department of Environmental Conservation, Anchorage
- [1249] Mr. David Williams, Dept. of Health and Social Services, Juneau
- [1264] Ms. Vicki Williams, Department of Corrections, Anchorage
- [994] Mr. Geoff Wistler, Department of Commerce and Economic Development, Juneau