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August 12, 1988

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

Dear Mr. *Boyd* Evison:

The State of Alaska has reviewed the National Park Service (NPS) draft Environmental Impact Statement (EIS)/Wilderness Recommendations for Aniakchak National Monument and Preserve. The following letter is submitted on behalf of state agencies and represents a consolidation of state concerns and comments.

In summary, the state recommends that the NPS develop and recommend a new alternative that 1) considers the impacts of development on adjacent state lands and 2) avoids Wilderness in the vicinity of the trail from Kujulik Bay to Lava Creek. The state's comments are presented in four sections as follows: Introduction; Wilderness Recommendations; General EIS Comments; and Page-specific Comments.

INTRODUCTION

The State of Alaska recognizes that Wilderness has a legitimate place in the range of public land use classifications which exist in Alaska. However, the state believes that a portion of the NPS Wilderness recommendation contained in this EIS is inappropriate. The state has used the following criteria to review the Wilderness recommendations and suggest modifications. Given the NPS's familiarity with these areas, we also urge the NPS to carefully review its draft recommendations to determine whether any lands included in its proposed actions fall within the categories described below. If NPS finds that certain recommended lands do fall in within one or more of these categories, the state requests that NPS either 1) explicitly identify them in the final EIS and provide compelling reasons for recommending them or 2) delete them from the proposed action(s).

Criteria

1. Areas where Wilderness designation would eliminate, reduce or restrict existing uses, structures or activities that are allowed by the Alaska National Interest Lands Conservation Act (ANILCA) and are not degrading resource values;

2. Areas where there is a current or foreseeable interest in or need for:
 - a) NPS visitor facilities or recreational development (e.g., visitor centers, campgrounds, trails, lodges, public use cabins);
 - b) developed access (e.g., roads, airstrips, docks, helicopter landing sites);
 - c) state or federal administrative/management facilities (e.g., ranger stations, air/water quality monitoring stations, research facilities);
 - d) utility corridors or facilities (e.g., pipelines, power transmission lines, remote communications equipment);
3. Areas with valid and/or patented mining claims;
4. Areas that have reasonable potential for inclusion in land exchanges or where park boundaries are in dispute;
5. Areas where cabins or other structures are used for commercial (e.g., guiding or commercial fishing) or residential purposes;
6. Areas where mechanized equipment (e.g., chainsaws, generators) has traditionally been used to support commercial, recreational, subsistence, or management activities;
7. Areas immediately adjacent to roads, mining activity, recreational facilities, land with oil and gas potential or existing leases, or other existing or proposed development;
8. Areas where off-road vehicles have been traditionally used; and,
9. Areas immediately adjacent to state lands, navigable waterbodies, submerged lands, tidelands, and possible Revised Statute (RS) 2477 rights-of-way.

In addition, the state requests that the NPS explicitly evaluate its recommendations for conformance with the following September 1986 Department of the Interior (DOI) guidance regarding lands which merit consideration for Wilderness designation:

1. Areas with unique resources or characteristics that may have been overlooked by Congress when it established the Wilderness designations in ANILCA;

2. Areas that, as a result of user trends, land use patterns, and other influences, may have evolved as integral to the Wilderness experience;
3. Adjustments to the boundaries of already designated Wilderness to make boundaries conform more closely to natural features or to facilitate resource management and protection; and,
4. Areas that possess such unique and special qualities that make it appropriate to preclude future NPS management options.

The state is particularly concerned that the Wilderness recommendations meet DOI's first criteria. The exceptional resource values of these park units have already been acknowledged by the creation of the parks. Adding an additional layer of protection to this must be clearly justified. The state requests that NPS explicitly identify the resources and values in each of the areas proposed for Wilderness designation that warrant this added layer of protection.

Aniakchak National Monument and Preserve Wilderness
Recommendations

Recommendation:

Delete the portion of the Wilderness recommendation adjacent to the possible RS 2477 right-of-way from Kujulik Bay to the headwaters of Lava Creek.

Rationale:

While development of this possible RS 2477 right-of-way is not envisioned, the state wishes to preserve maximum flexibility to improve this corridor if needed in the future. A Wilderness designation would not automatically preclude such development, but would undoubtedly make the process more difficult. Wilderness designation would also further complicate management of potential user conflicts.

Recommendation:

The NPS may wish to modify its proposed Wilderness boundary in the vicinity of state lands to protect Wilderness values from the possible impacts of adjacent development.

Rationale:

Wilderness values could be affected by oil and gas development occurring on state lands to the northwest of the unit. No oil and gas lease sales are currently scheduled or anticipated, but the long-term possibility of such activities should be considered by NPS.

GENERAL EIS COMMENTS

- 1) The document does not adequately justify NPS Wilderness recommendations, i.e., why certain lands are recommended for Wilderness designation and others are not. It is not clear how NPS determined which suitable parklands should be recommended for designation. The state recommends that the NPS add a new section to the final EIS which describes the criteria NPS used to develop Wilderness recommendations and identifies the specific resources and values it is seeking to protect.

This is particularly important in the case of proposed actions. We note that the U.S. Fish and Wildlife Service, a sister agency in the Department of Interior, includes in its Comprehensive Conservation Plans a chapter titled "Evaluation of Alternatives" which presents evaluation criteria, compares alternatives, assesses the relative costs of each alternative, and explains why the preferred alternative was chosen. (See draft Arctic National Wildlife Refuge CCP/EIS, pages 384-399.) We request that the final EIS contain such an evaluation.

Because Wilderness limits management options, opportunities for development, and certain public uses of parklands, the state cannot support the designation of additional Wilderness unless a compelling reason exists for such designation. The state urges the NPS to include additional rationale for its Wilderness recommendations in the final EIS.

- 2) The document does not adequately describe the differences between management of Wilderness and non-wilderness parklands. Because these differences are not clearly delineated, the public cannot fully assess the impacts of Wilderness designation. As we have urged in the past (see November 24, 1986, correspondence), the state recommends that the NPS include in each document a table which lists activities, structures, and uses which are affected by Wilderness designation. The table included in the Alaska Land Use Council's Draft Wilderness Review Guide (1987) could be used as a basis for this list. The state suggests that the following items, among others, be included in the list: 1) visitor centers, public use cabins, and campgrounds; 2) roads, airstrips, utility corridors, and docks; 3) guide cabins and camps; 4) use of chainsaws and generators; 5) use

of off-road vehicles and helicopters; 6) use of inholdings and adjacent lands; 7) commercial fishing; and 8) use of temporary facilities.

The state notes that there are many activities, uses and structures which NPS may manage more restrictively in Wilderness than in non-Wilderness parklands, even though there are no laws or regulations which specifically mandate increased restrictiveness for these uses. (See Lake Clark EIS, page 47, paragraph 1.) The state therefore requests that NPS more clearly describe how Wilderness designation will affect NPS management philosophy and policies. The state is particularly interested in how Wilderness designation will affect NPS discretionary decisions, e.g., issuance of special use permits and the conditions attached to these permits.

As an example, the NPS considers development of a 30-room lodge on the Harding Icefield in the Kenai Fjords NP to be a "reasonably foreseeable action" if no adjacent lands are designated as Wilderness. If adjacent lands are designated as Wilderness, the NPS indicates that a 20-room lodge is a "reasonably foreseeable action." The state is not aware of any laws or regulations which specifically address lodge size; however, NPS appears to have a management preference for smaller developments on lands adjacent to Wilderness areas. The state believes it would be useful for the public to better understand the effect of Wilderness designation on discretionary NPS administrative decisions.

- 3) Each of the EISs (page 7 of Aniakchak) notes that the validity of RS 2477 rights-of-way and the navigability of rivers (as it relates to state ownership) will be determined on a case by case basis, and that navigable rivers and valid RS 2477 rights-of-way would not be designated as Wilderness. This statement should be expanded to explain how navigability determinations and RS 2477 validity determinations will be addressed after Congress has acted on these Wilderness recommendations. Specifically, the state requests that the intent of this paragraph be clarified with the following insert at the end of the last sentence: ". . . even if the navigability or validity determination is made after the surrounding area has been designated as Wilderness." Further, we request that this intent be included in any Wilderness legislation forwarded to Congress by the NPS.
- 4) The EIS does not adequately stress that the development and use scenarios presented for each alternative are speculative. Since these scenarios provide the basis for assessing the impacts of Wilderness designation and may affect public opinion regarding the merits of designating Wilderness, the

EIS should repeatedly stress that the scenarios represent the NPS's best guess at future needs and developments. Actual developments and associated impacts may be much greater or lesser than described. The state suggests that the NPS remind readers at the conclusion of each impact analysis that the scenarios and impacts analyses are hypothetical. The state further suggests that the EIS clarify that some of the developments contained in the scenarios are not consistent with the adopted General Management Plan (GMP) and would, therefore, not currently receive approval from the NPS.

- 5) The EIS does not adequately describe the relationship between the management directions established in the GMP for this unit and the Wilderness recommendations. The state requests that the final EIS discuss this relationship. In particular, the GMPs generally indicate that NPS intends to maintain options for future visitor-related development. The EIS should clearly discuss how this objective is affected by the Wilderness recommendations. The state requests that where Wilderness will preclude opportunities for future visitor developments, the EIS identify alternative development sites; provide clear rationale for proceeding with the recommendation; or exclude the area(s) from the Wilderness recommendation.
- 6) The EIS (page 7) states that "helicopter landings are not permitted in Wilderness except when necessary for administrative purposes such as search and rescue activities, NPS research for management purposes, fire management". The state requests that the EIS clearly indicate that state agencies with management and research responsibilities within park units (e.g., the Alaska Departments of Fish and Game, Public Safety, Natural Resources, and Environmental Conservation) may also land helicopters in designated Wilderness when necessary.
- 7) The maps included in the EIS are not adequate for finding landmarks addressed in the respective texts. The state requests that at least one map be included in each EIS showing pertinent features that are referenced in the text. Further, we strongly urge that the final documents be accompanied by more detailed inset maps showing the proposed new boundaries in greater detail.
- 8) Each EIS presents tables depicting estimated subsistence resource harvest levels. (See pages 43-44 in Aniakchak.) The headings for these tables are inadequate for explaining their content and could be problematic if the tables are taken out of context. The EIS indicate that the subsistence harvest levels depicted in these tables are "very rough

estimates extrapolated from a variety of sources listed in the bibliography." We recommend further discussions of how these figures were developed and their margin of error. The Alaska Department of Fish and Game, Division of Subsistence technical reports are among the sources cited, but it appears that considerable guess work was also used. While we appreciate the effort to estimate subsistence harvest levels in the park units, we believe a more detailed explanation is necessary to assure proper use of this information in the future. If additional explanatory material cannot be added to the text, we recommend deletion of these figures to avoid basing decisions on potentially invalid or poor information. This is especially important since this information may be used for decision-making in other contexts.

- 9) The term "subsisters" should be deleted wherever it occurs in the EIS and replaced with "local rural residents" or similar language. Similarly, references to "commercial hunting" should also be replaced with "guided hunting" or "hunting guide camps". There is no "commercial hunting" in Alaska in the sense that wildlife cannot be sold.
- 10) The state objects to the proposed NPS requirement that subsistence users obtain a permit for use of chainsaws in designated Wilderness and non-wilderness areas. The state believes this requirement imposes an unnecessary regulatory burden on local rural residents and others. The cutting of wood for heating, temporary shelters, and materials for trapping has gone on for decades. In addition, the state notes that the U.S. Fish and Wildlife Service allows subsistence use of chainsaws without a permit in Wilderness and non-wilderness areas.

The state also disagrees with NPS's determination that use of motors (e.g., generators) is prohibited in Wilderness areas in Alaska. As stated in each EIS, ANILCA modifies implementation of the Wilderness Act in Alaska. Numerous sections of ANILCA (e.g., Section 1315) permit uses in Alaska Wilderness that are not permitted in Wilderness areas in the lower 48 states. The state believes that Section 1316 of ANILCA, which provides for the use of "temporary facilities and equipment," authorizes use of motorized equipment in Alaska Wilderness areas if directly and necessarily related to the taking of fish and wildlife. The state supports a policy of allowing limited use of motorized equipment in support of traditional activities (e.g., guiding and subsistence) where it would not significantly detract from Wilderness values.

- 11) The state is uncomfortable with Wilderness recommendations immediately adjacent to state lands. To date, there has been little indication that an NPS Wilderness designation could be used to restrict development activities on adjacent state lands. However, in the long-term, there are no assurances that legal and/or political pressures will not change this situation. For this reason, the state requests that all the EIS, and any subsequent proposed legislation, contain a statement of intent that the designation of Wilderness will not affect the use and development of adjacent non-federal land.
- 12) The ANILCA Section 810 evaluations contained in the EISs are lacking in the specificity needed to facilitate an assessment of the potential effects of the proposed actions on subsistence uses. (See page-specific comments.) Our major concerns regarding the 810 evaluations are 1) contrary to what is suggested in the plans, subsistence use "patterns" are not depicted; only harvest estimates are provided and their accuracy is questionable; and 2) because subsistence use patterns of the unit and adjoining areas by resident zone communities are not described, the EIS fail to sufficiently evaluate the potential effects on subsistence uses of either the proposed action or other alternatives.

The state recommends that the final EIS include a more thorough discussion of how the proposed Wilderness areas are and have been used for subsistence purposes by local rural residents and communities. This discussion should include, but not necessarily be limited to, months of harvest activities; resources harvested; modes of access for specific activities; and additional material on how harvest data were developed.

PAGE-SPECIFIC COMMENTS

Page 6. The second paragraph contains the following statement: "In the event that . . . driftwood cutting is proposed, a permit from the Superintendent would be required before chainsaws could be used." Given that driftwood is commonly associated with beaches, the statement should be clarified to indicate that this policy would not apply to state-owned tidelands and navigable waterways.

Page 9, Study Area. We request that NPS acknowledge state-ownership of tide and submerged lands adjacent to the preserve. Such recognition is needed, via a footnote, on this and other maps in the document.

Pages 5, 8, 9, 11, 12-14, 51-53. On these pages, and possibly elsewhere, are references to "commercial hunting" and "commercial

hunting camps". As noted in our general comments, these references should be replaced with more appropriate language.

Pages 11, 13, 19, 46, 52, and 65. Additional background and management intent would be helpful regarding "A cabin, used occasionally by the NPS as a seasonal ranger station and otherwise available for public use, is at the mouth of the Aniakchak River." (page 11). Conversations with NPS staff indicate that this is not a designated "public use cabin", but rather is available to the NPS and public on an equal first-come first-serve basis. The EIS should clarify that if it is in use by the public when NPS personnel arrive, the NPS will not evict the occupants. For pages 46, 52 and 65, it would also be appropriate to clarify that this cabin is "intermittently used" as a seasonal ranger station.

Page 13, last paragraph. The private cabin on the North Fork is on a Native allotment. The description, however, could imply that it will be used as a ranger station and public use cabin. Further explanation would be helpful. The purpose of the "two additional cabins on North Fork allotments" is also unclear. At a minimum, we suggest adding "private" to the first two references to cabin(s) in this paragraph.

The discussion of cabins on page 13 is a good example of the need to make a distinction between hypothetical scenarios and planned NPS activities. (See our general EIS comment #4.) According to NPS staff, the use of the cabin at the mouth of the Aniakchak River has already been determined, while the North Fork cabins and their use are strictly hypothetical. Based on the text alone, this important distinction is not evident. This confusion increases the already difficult task of understanding the difference between the alternatives.

Page 19. The following key policy statement attempts to distinguish the no action alternative from the proposed action alternative:

"The possible development activities associated with Alternative 2 are the same as those described under the no action alternative, except that development might be more restricted around the recommended Wilderness area identified under the proposed actions than under the no action alternative."

It may be more appropriate to simply note that long-term development opportunities are foreclosed under Alternative 2.

Pages 42-43, Subsistence Use. As noted in our general EIS comment #8, the state is concerned about the accuracy of, and procedures used to develop, this table. Neither Table 4, nor the accompanying text, presents an accurate picture of the "overall

pattern of subsistence-resource use around the monument/preserve." Such a discussion would normally include seasonality of harvest patterns, harvest methods, processing and preservation of resources, distribution and exchange of resources, etc. The tables are limited instead to annual harvest levels. We suggest changing the first sentence or expanding the discussion as noted.

Page 43, Table 4. We request that this table be revised consistent with the following technical paper: James A. Fall and Judith M. Morris, 1987. "Fish and Wildlife Harvests in Pilot Point, Ugashik, and Port Heiden, Alaska Peninsula, 1986-1987." ADF&G, Division of Subsistence Technical Paper No. 158, Juneau. Examples of current inaccuracies include the sample population participating in the Pilot Point survey reported harvesting 93 caribou in 1986-1987, nearly twice as many as the NPS estimates being harvested by all area communities. Also, there are no black bears in Aniakchak according to state biologists.

Page 44, Table 5. The conversion factors used in developing this table appear to have been derived from pounds edible weight for species in the Copper River Basin. We recommend that conversion factors in the Division of Subsistence report cited above (see Appendix B on pages 222-223) or in the Fall/Morris 1987 report listed in the bibliography of the EIS be used instead. We also note that the percentages in Table 5 would change based on corrections and updates made to Table 4.

Page 45, Subsistence Map. The area depicted for subsistence harvest of caribou by area communities is incomplete. Maps in the Southwest Regional Habitat Management Guide Map atlas show that the Chignik villages also use areas near their communities to harvest caribou. The Atlas also contains additional mapped information for Ugashik that should appear on this map.

Page 46. We request that discussions of transportation corridors through the unit acknowledge that Title XI procedures involve Congressional approval.

Page 47. We request clarification of the following statement in the sixth paragraph: "A significant amount of guided hunting/fishing in the preserve is not accurately reported . . .". According to conversations with NPS staff, this statement was made because more commercial operators are using the unit than NPS commercial use permits would indicate.

Page 54. We request clarification of the following statement: "Policy over the long term would vary on decisions about such things as road locations and mileage, landing sites, extent and location of facilities, and degree of controls applied to activities such as vehicle use, open and closed areas of use, and physical developments." "Road locations and mileage" in the

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monument can only be approved by Congress (Title XI). The extent and location of facilities should be consistent with the GMP. "Degrees of controls on vehicle uses, open and closed areas, and related developments . . ." are subject to Title XI regulations, public hearings, etc. The statement as written does not clarify the difference between Wilderness and non-wilderness designation overlapping monument and preserve status.

Page 88. A reference to storage of commercial fishing equipment is included here, but the current policy on continuing such storage is not clarified in the EIS. We request that the current policy be included in discussion of the alternatives.


Page 88, Issues Dismissed. As noted in our comments on this document, we believe that access, commercial fishing supply storage, and oil and gas development are, indeed, important issues that the EIS should address. This is true in part because Wilderness could affect these activities in the long run, and in part because the public would benefit by a discussion clarifying common misconceptions.

Pages 93-98, ANILCA Section 810 Evaluation. As noted in our general EIS comments, we request that the Section 810 evaluation be expanded, including a discussion in the Access section that acknowledges the different types of transportation used by area communities within and near the park unit and adjoining areas, as well as aircraft and three-wheelers used for caribou hunting by some area communities. (Our analysis has not determined whether these modes are used in the park unit).

On behalf of the State of Alaska, thank you for the opportunity to review this draft EIS. If we can be of assistance in clarifying the state's comments, please do not hesitate to call this office.

Sincerely,

Robert L. Grogan
Director



By Sally Gibert
State CSU Coordinator

Draft Wilderness Comments
Aniakchak National Monument
and Preserve

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