



May 5, 2020

Philip Hooge, Superintendent
Glacier Bay National Park and Preserve
P.O. Box 140
Gustavus, AK 99826

Dear Mr. Hooge:

The State of Alaska reviewed the Glacier Bay National Park and Preserve's (Park) newsletter regarding planning efforts that are underway to revise the 1989 Glacier Bay National Park Wilderness Visitor Use Management Plan. The newsletter indicates the scope of the revised plan will include 2.6 million acres of designated Wilderness lands and waters in Glacier Bay National Park; areas excluded from the backcountry planning area include inholdings and non-wilderness waters and lands addressed in other management plans (such as the Park's frontcountry area and the Preserve) and rafting activities associated with the Alsek River. The following comments represent the consolidated views of state resource agencies.

ANILCA Context

The newsletter identifies the Service's Preliminary Planning Vision as "The backcountry of Glacier Bay National Park provides opportunities for people to immerse themselves in an intact, dynamic wilderness, now and forever. There are multiple ways to experience the backcountry ranging from the deck of a cruise ship to a multi-day kayaking or backpacking trip." We support the concept of providing opportunities for accessing the backcountry and request the plan identify the various exceptions to the Wilderness Act that were included in the Alaska National Interest Lands Conservation Act (ANILCA) to ensure the vast and remote wilderness areas designated in Alaska, the majority of which lack road and trail access, would be accessible for use and enjoyment by the public. ANILCA Section 707 specifically directs to Service to manage designated Wilderness in Alaska in accordance with applicable provisions of the Wilderness Act, *except as otherwise provided for in this Act*. Examples of the exceptions referred to in Section 707 include:

- Section 1110(a) – authorizes motorized and non-motorized methods of access for traditional activities and travel to and from villages and homesites.
- Section 1307 – authorizes the continuation of existing visitor services
- Section 1315(c) and (d) – allows for the continuation and maintenance of existing cabins and the construction of new cabins and shelters for the protections of public health and safety
- Section 1316 – authorizes the use of temporary facilities and equipment where the taking of fish and wildlife is permitted

We request this important legal context be included in the plan and help guide a full range of management actions to consider during this planning process.

Similarly, we request the plan also specify the Park's purposes as identified in ANILCA Section 202(1) and the original Monument designation, which are supplemented by the Wilderness Act's purposes, including the public purposes of recreational, scenic, scientific, education, conservation, and historic use. In contrast, the 1989 plan merely quotes from ANILCA Section 101(a) and (b), implying the overarching purpose of designating vast areas across Alaska as conservation system units are the park's specific purposes, and supplemented by a general policy statement from Section 2(a) of the Wilderness Act.

Visitor Access and Park Use

National Parks are important economic drivers for local communities. We support considering different ways to improve access to responsibly increase visitor use. Access to the Park is primarily by watercraft and we support the vital role that commercial transporters and guides play in providing public access. When addressing management concerns, we request the Service employ the least restrictive management tools to minimize the effects on visitors while also protecting the resource.

The newsletter asks the public to provide their perspective on constructing new trails in the backcountry. We support consideration of new trails to access the backcountry to expand recreational opportunities in the park. The park currently only has two trails that lead into the backcountry and one, the Bartlett Lake Trail, was proposed for closure in the Frontcountry Plan. However, the final decision for the Frontcountry Plan indicated the proposed closure for the Bartlett Lake Trail was being reconsidered. We recommend this planning effort consider maintaining the Bartlett Lake Trail and/or constructing other trails as a means to disperse use and increase opportunities for visitors to experience the solitude associated with the backcountry wilderness areas of the park.

The Park's website notes the efforts over the past four years to collect visitor survey data "to further determine travel patterns and areas of high use. Data collected from this survey will be analyzed in the winter to decide what restrictions, if any, should be placed on kayaker/camper use of Glacier Bay." We strongly advocate for science-based decision-making and would like to applaud park staff for grounding this management plan in data collection efforts to guide management decisions and the recognition that use patterns may have come to exceed conditions outlined in the 1989 plan. To mutually meet visitor and Park needs, we request the plan consider alternatives to group size and length of stay limits, such as periodic cleanup of known problem areas or primitive site hardening as means to accommodate camping while minimizing impacts to park resources.

While often overlooked in wilderness/backcountry plans, as mentioned above, ANILCA Section 1315(d) sets out the parameters for new cabins and shelters in designated wilderness. While the Park does not currently contain any cabins or shelters, Alaska's weather extremes often necessitate the use of cabins/shelters for winter use of parks for health and safety concerns. ANILCA sets out the design criteria to ensure cabins/shelters are compatible with the wilderness landscape. We request cabins/shelters be analyzed in the range of alternatives.

State Management Authorities

The Alaska Department of Fish and Game (ADF&G) is responsible for the sustainable management of fish and wildlife throughout the State of Alaska regardless of land ownership. Section 1314 of ANILCA affirms that the state retains its authorities to manage fish and wildlife on public lands. This management authority includes determining population objectives and harvestable surplus and

allocating fish and wildlife – including for subsistence purposes – unless specifically preempted by federal law. ADF&G “administer[s] the state program for the conservation and development of the state’s... sportfish” and manages fish and wildlife in accordance with recognized scientific principles to assure the sustainability of fish and wildlife populations. ADF&G’s management program is extensive, with staff experienced in evaluating the health, nutritional condition, and sustainable harvest of fish and wildlife populations.

As part of our management responsibilities, ADF&G periodically conducts research work within park and Wilderness boundaries. This work includes installations as well as access by motorboats, aircraft, and helicopters. The timing of these activities is largely dependent on biological concerns and weather openings. We request the plan outline any management prescriptions that apply to such administrative uses and the cooperation requirements outlined in the MMOU. We note that both the Wilderness Act and ANLCA provide flexibility in considering the need for administrative uses.

The Alaska Board of Fisheries (BOF) is responsible for the conservation and development of the state’s fishery resources. Codified at AS 16.05.251, the BOF’s authorities include establishing open and closed seasons and areas for the taking of fish; establishing means and methods employed in pursuit, capture, transport of fish, including regulations that are consistent with resource conservation and development goals; and regulating resident and non-resident sport fishers as needed for the conservation, development, and utilization of fisheries resources. We request the Service utilize the (BOF) process and consult with ADF&G regarding any fisheries management concerns as they arise and before proposing any actions.

We request the revised Backcountry Management Plan recognize the role of ADF&G’s fish and wildlife management authority as the Park Frontcountry plan does. That plan states:

If there were a noticeable change in angler harvest and associated catch rates, which may be predictive of harvest concerns and population viability, park staff would consult with Alaska Department of Fish and Game (ADF&G) to determine whether there is a conservation concern and, if necessary, consider proposals to the Board of Fisheries to implement additional management strategies to reduce pressures on fish populations from recreational fishing, such as reducing daily bag limits, limiting gear types, or implementing temporary spatial or temporal closures.

The State of Alaska maintains management authority of fisheries resources. Under all alternatives, ADF&G would use its authority through an Emergency Closure or through the Board of Fisheries process to change sport fishing regulations if a conservation concern was present. Additionally, under the Master Memorandum of Understanding between the NPS and ADF&G, the NPS commits to using the State’s regulatory process to the maximum extent allowed by Federal law in proposing changes in existing State regulations.

We also request the plan reference the ADF&G/NPS 1982 Master Memorandum of Understanding (MMOU) regarding management. Recognition of the respective roles our agencies have, along with a commitment to consultation and cooperation on issues that affect each of our agencies’ responsibilities, will help ensure clear management directives and positive interagency relations.

Thank you for the opportunity to comment. ANILCA Section 1301 directs a collaborative approach when developing and revising management plans for Alaska park units. We look forward to working

with Park staff on the development of this plan and to exploring ways to cooperatively resolve management concerns, including the use of state management tools, where appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Susan Magee
ANILCA Program Coordinator