



Public Scoping Report

Backcountry and Wilderness Stewardship Plan

General Management Plan Amendment and Environmental Assessment

December 2015



ON THE COVER

Photograph of the Skolai Pass area.

Photograph by Nyssa Landres, National Park Service

Contents

	Page
List of Tables	v
Introduction.....	1
Public Scoping Process	3
Interviews	3
Public Meetings	4
Briefings Provided.....	4
Tribal Consultation.....	4
Summary of Comments Received	5
Airstrips	5
Cabins	6
Motorized Use	6
Visitor Use & Impacts.....	8
Commercial Use	10
Subsistence	10
Cumulative Effects	11
Miscellaneous	12
How Comments Will Be Used	13
Summary of Future Steps in the Planning Process	14
Proposed Action Development.....	14
Development of Management Alternatives.....	14
Draft EA	14
Final EA and Plan.....	14
Opportunities for Public Participation	15
Staying Up to Date	15
Submitting Comments.....	15
Appendix A – Interview Content.....	16

List of Tables

	Page
Table 1. Airstrip use and management – interview content.....	16
Table 2. Cabin use and management – interview content.....	17
Table 3. Motorized use – interview content.....	18
Table 4. Visitor use and impacts – interview content	19
Table 5. Commercial use – interview content.....	23
Table 6. Subsistence – interview content.....	25
Table 7. Cumulative effects – interview content	26
Table 8. Miscellaneous – interview content.....	27
Table 9. Outside scope of plan – interview content.....	28

Introduction

Wrangell-St. Elias National Park & Preserve is in the process of preparing a Backcountry and Wilderness Stewardship Plan and Environmental Assessment (hereafter referred to as ‘the plan’). The purpose of this plan is to guide the stewardship of backcountry and wilderness character and resources in Wrangell-St. Elias within the legal framework of the Wilderness Act of 1964, the Alaska National Interest Lands Conservation Act of 1980 (ANILCA), and National Park Service (NPS) policy and regulations.

The plan will encompass the entire Wrangell-St. Elias Wilderness, the largest wilderness in the National Wilderness Preservation System with 9.4 million acres, as well as 1.7 million acres of backcountry (Figure 1). The backcountry areas included in the plan are remote, inaccessible areas that share many characteristics with the Wrangell-St. Elias Wilderness, but are not designated as wilderness. “Backcountry” is broadly defined as areas that are not accessible within one day of travel from the road system using non-motorized or non-mechanized means of travel. Management prescriptions developed for these backcountry areas will most likely be different than those prescribed for designated wilderness. “Frontcountry” areas, which are generally more developed areas accessible within one day of travel from the road system, are not included in this plan. The plan is not a wilderness eligibility assessment and will not evaluate additional lands to be recommended or designated as wilderness.

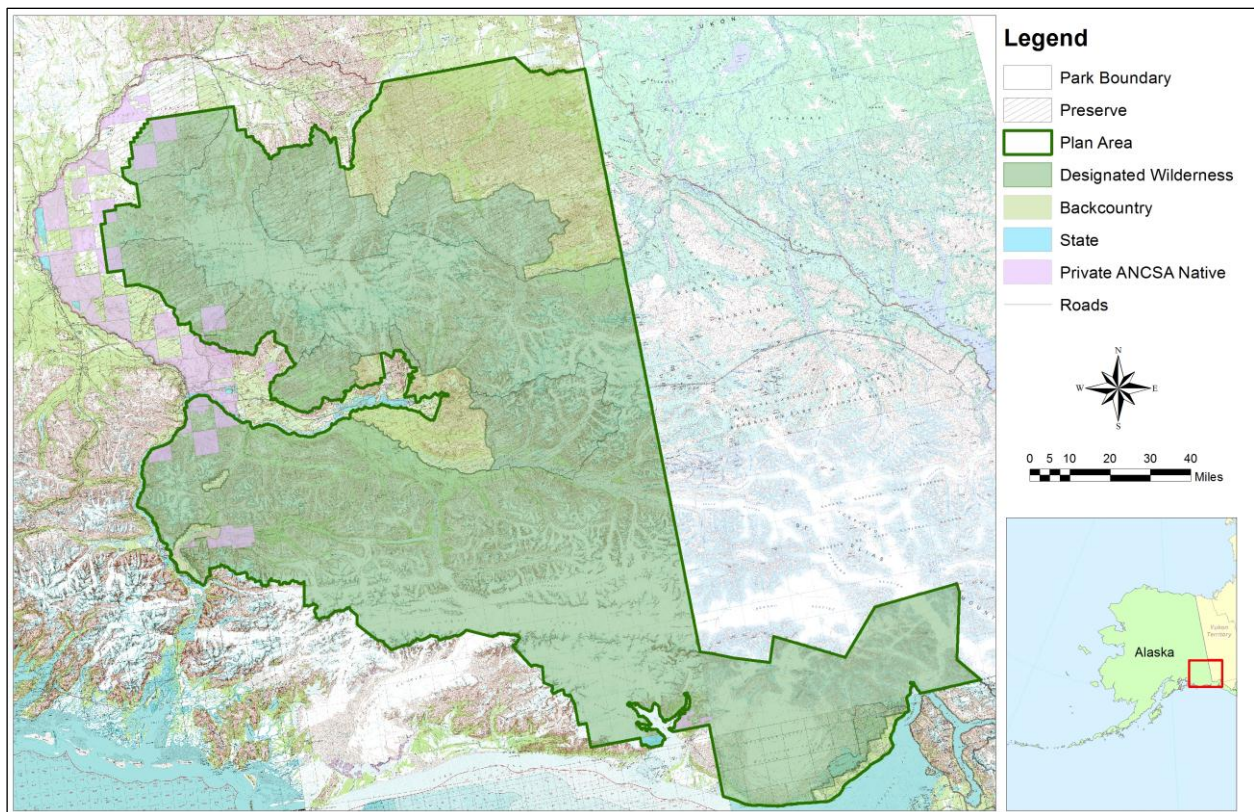


Figure 1. Plan area.

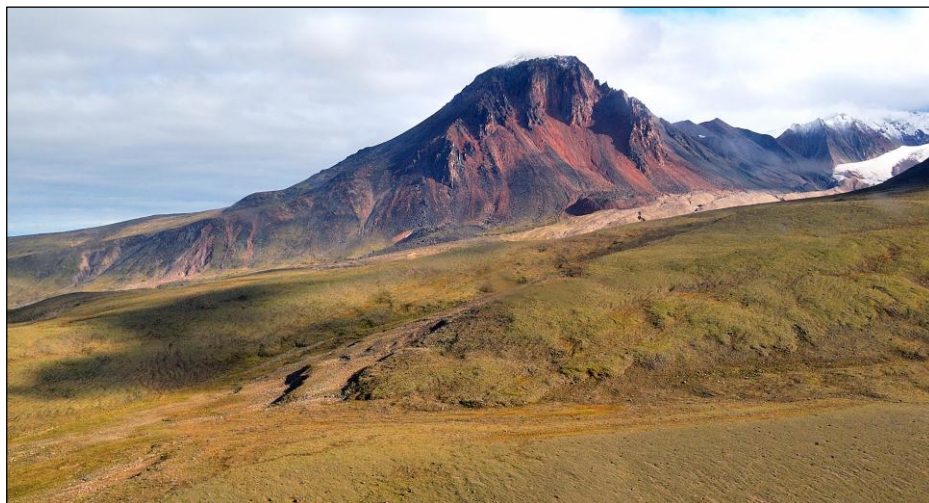
Wrangell-St. Elias is undertaking this plan because the General Management Plan for the park, completed in 1986, is outdated and does not adequately address the protection and stewardship of backcountry and wilderness. Park management needs guidance for how to approach management issues specific to backcountry and wilderness in a consistent and transparent way. This guidance needs to facilitate the preservation and use of these areas in accordance with desired conditions defined through public input and in compliance with NPS policy.

This plan will provide long-term guidance for various management topics within the backcountry and wilderness, including: management and maintenance of remote airstrips; maintenance of cabins; visitor use and impacts; providing continued reasonable access to subsistence opportunities and resources; commercial use; motorized use, including off-road vehicles (ORVs) and snowmachines; cumulative effects incurred by the combination of these factors, including uses by the NPS; and other topics as needed.

To provide this guidance, the plan will:

- identify desired future conditions for the backcountry and wilderness;
- provide comprehensive management prescriptions;
- develop specific management indicators and standards to protect wilderness character and protect opportunities for high quality visitor experiences; and
- identify management tools to address recreational and commercial uses and provide for customary and traditional subsistence activities.

This document summarizes the public scoping phase of the planning process. The steps in the planning process are directed by the National Environmental Policy Act of 1970 (NEPA) and guidance outlined in recent NPS directives on wilderness stewardship as found in Reference Manual 41, namely the *Wilderness Stewardship Plan Handbook* released in 2014.



Wrangell Foothills. Photo by Bryan Petryl, NPS.

Public Scoping Process

Wrangell-St. Elias National Park & Preserve engaged in public scoping for the Backcountry and Wilderness Stewardship Plan from May 2015 through November 2015. A Notice of Intent was not published in the Federal Register as this plan is intended to be conducted as an Environmental Assessment (EA). The results of internal and public scoping have affirmed that the plan will proceed as an EA, as opposed to an EIS. NPS does not anticipate that proposed management actions will result in significant impacts to the human environment; nor does it anticipate a high level of controversy in regards to impacts to the human environment. If transitioning the plan to an EIS becomes necessary at any point during the planning process, a Notice of Intent will be issued in the Federal Register, along with other requirements under NEPA.

Public scoping consisted of three primary components – interviews held with stakeholders, public meetings, and briefings to stakeholder groups. Information on the plan was available on the NPS Planning, Environment, and Public Comment (PEPC) site for comment by any individuals over the duration of the public scoping period.

Interviews

Interviews were conducted to engage individuals who may not otherwise be involved in the planning process.

Individuals were sought out based on extensive knowledge and experience in Wrangell-St. Elias and with the topics being addressed in this plan. The planning team approached most of the individuals to request interviews, but also responded to recommendations of additional individuals and when individuals requested to be interviewed. The purpose of the interviews was to help identify and clarify potential issues and opportunities within the scope of this plan from the perspective of local residents, subsistence users, native/tribal community members, commercial operators, and other stakeholders.

The interviews began in the summer of 2014 and initially focused on commercial operators. By 2015, the scope of the

interviews expanded to include long-time residents of communities surrounding the park and various other users of the park. Interviews were conducted with stakeholders from diverse geographic areas surrounding the park, ranging from Tok, to Chitina, to McCarthy, to Yakutat. The interviews



Chitistone River. Photo by Neal Herbert, NPS.

themselves were structured with flexible questions, allowing the interviewee to steer the conversation. Topics the planning team attempted to bring up in every interview included the interviewee's knowledge and experience in Wrangell-St. Elias, what the interviewee perceived as threats to the backcountry and wilderness areas of the park, and what recommendations they have to address those threats and any other actions this plan should take. By November 30, 2015 a total of 61 interviews were completed.

Public Meetings

The park held a total of 8 public meetings between June and July 2015 in various locations surrounding the park, including: Kennecott/McCarthy, Copper Center, Slana, Valdez, Anchorage, and Tok. A total of 59 attendees were present at the 8 meetings. At the first round of public meetings the planning team held open-house style discussion with attendees and displayed posters that described the planning process, the legal framework of the Wilderness Act and ANILCA, anticipated management challenges, a map of the plan area, and the intersection of people and wilderness. Two additional meetings were held in locations that expressed interest in additional outreach and education. At these meetings, the planning team gave a presentation on the legal framework of the plan provided in the Wilderness Act and ANILCA, followed by discussion. These meetings were held in Kennecott/McCarthy and Copper Center. Public meetings were advertised using flyers posted in local communities, a newspaper article, and radio public service announcements.

Briefings Provided

Briefings on the plan were provided as requested and as opportunities arose. Briefings were provided to the Wrangell-St. Elias Subsistence Resource Council (SRC), the Southcentral, Eastern-interior, and Southeast Regional Advisory Councils (RACs), the Ahtna Corporation, the State of Alaska, the Citizen's Advisory Council on Federal Areas (CACFA), the McCarthy Area Council, and Copper Country Alliance.

Tribal Consultation

The NPS has held government to government meetings with the Mentasta Village Council, the Cheesh'na Village Council, and Tazlina Village Council to briefly describe the planning initiative and ask for their participation. A meeting with the Yakutat Tlingit Tribal Council is forthcoming. Ongoing consultation will be sought as the planning process continues.

Summary of Comments Received

Content from the public scoping process is summarized below, including 1) comments received as part of the official scoping process required under NEPA and 2) feedback and input received in the interviews. Content is organized based on the primary management topics that will be addressed in this plan. Within each topic, feedback from official comments and the interviews are summarized separately.

Official public comments received as part of this scoping process were submitted through four primary channels: letters sent via regular mail, email, the NPS PEPC website, and at a public meeting. A total of 32 official comments were received.

For the summary of the interviews, general sentiments held by individuals are not included as “comments” unless these views were explicitly stated. All comments received in the interviews are available in [Appendix A](#), which also shows the number of people who said which comments. Comments that were outside of the scope of this plan are not included in the summary below, but are available in [Table 9](#).

Airstrips

Official Comments

Most comments regarding airstrips focused on designating a limited number of airstrips for use, potentially limiting airstrips to those already in use, and not allowing new landing sites to be established.

Additional comments asserted that existing airstrips need to be maintained, as they are vital portals of access into the park. One comment requested that the construction of new airstrips be considered, and another comment requested that airstrips be marked on maps.

Interview Content

Interview discussion on airstrip maintenance predominately emphasized the need for maintenance to occur, but differed on the preferred approach for how maintenance occurs. The two primary suggestions for how maintenance should be completed were: 1) increased coordination between the NPS and commercial operators to perform maintenance, wherein commercial operators would perform many maintenance activities on airstrips; and 2) increased maintenance by the NPS. Some interviewees requested that the amount of maintenance increase, but did not specify how to achieve this goal. Very few comments asserted that airstrips should not be maintained at all, though some interviewees suggested that airstrips should only be maintained for emergency and safety purposes. Concerns over increased



Supercub with Mt. Blackburn in the background. Photo by NPS.

growth of brush on many airstrips, potentially correlated with the effects of climate change, were raised by a few interviewees.

Regarding airstrip management more broadly, some interviewees asserted that the NPS take a “hands-off” approach. A few individuals requested that information about where airstrips are located not be published by the NPS or others. Some comments asserted that new airstrips should not be developed or were not needed, whereas other interviewees stated that the development of additional airstrips could be a valuable tool to disperse use from popular areas.

Cabins

Official Comments

Comments regarding cabin management generally asserted that cabins should be limited in number. One comment to regulate cabins suggested that cabins not be available for use by fly-in users or individuals accessing the cabin via motorized transport, and that a reservation system be implemented for use of all cabins. In general, comments asserted that cabins provide less of a wilderness experience, but can play an important role in some circumstances, such as winter use or when visitors would otherwise be unable to visit the wilderness.

One comment requested that the plan maintain and make available as many cabins as possible, including consideration of additional cabins in wilderness. The value of cabins for safety and as examples of the park’s cultural history was cited as rationale.

Interview Content

Comments regarding cabin maintenance predominately asserted that at least some cabins should be maintained, though recommendations on which cabins should be maintained varied. The rationale typically expressed for why cabins should be maintained focused on the importance of cabins for safety and for making the area more accessible to less experienced users. Interviewees also expressed that cabins are valuable historic resources. Most commonly, interviewees requested that existing cabins be maintained, but no new cabins be constructed.

Most comments implied that the NPS should perform cabin maintenance, but some interviewees suggested that commercial operators or users coordinate with the NPS to perform repairs. The value of cabins as important for public safety was prevalent across many user groups that were interviewed, including long-time users who value cabins for safety during winter use, and commercial operators that use cabins to make visiting this park more practicable. Suggestions for managing cabin use were not consistent, with some comments supporting permit systems and others opposing permit systems.

Motorized Use

Official Comments

Comments regarding motorized use predominately affirmed the role of these methods of transportation in support of subsistence use and traditional activities. Simultaneously, many comments asserted that the impacts of motorized use by all individuals need to be managed so as to

leave park resources and wilderness character unimpaired. One comment asserted that any restrictions should address on-the-ground management issues.

Many individuals asserted that recreational snowmachine use should be prohibited and should not be considered a traditional activity. These comments were typically followed by a caveat that if recreational snowmachine use is allowed, use should be subject to regulations potentially including requirements to stay in designated areas or on trails, establish speed limits, prohibit high marking, among others. One comment asserted that recreational snowmachine use should be managed to minimize impacts, but not prohibited.

As technology develops, some comments identified significant potential for increasing snowmachine use in the future. Some comments were concerned that snowmachine access is essentially unlimited in winter months given the developments in modern technology. These comments generally requested that the NPS be proactive to restrict recreational snowmachine use before it becomes problematic or causes resource damage. Likewise, some comments asserted that snowmachines negatively affect wildlife and vegetation, and introduce pollutants into environment. Concerns about noise resulting from snowmachines were also prevalent.

Comments on ORV use asserted that use should be restricted or prohibited. Damage caused by ORV trails, impacts to natural soundscapes, and the cost of maintaining trails were cited as rationale for this restriction.

Many comments stressed the need for quiet landscapes in Wrangell-St. Elias. These comments generally identified motorized uses, including snowmachines, ORVs, helicopters, jet skis, and airboats, as the primary threats to natural soundscapes. A soundscape plan was requested in some comments, citing the negative impacts of motorized sounds on humans and wildlife.

Helicopter use was identified as problematic and as a use that is incompatible with wilderness values. Some comments advocated for prohibiting helicopter use as authorized by the NPS and disallowing landings except in emergency situations.

Interview Content

Comments on motorized use focused on three primary types of use: ORV use, snowmachine use, and helicopter use. Comments relating to ORV use generally identified ORV access as a threat and supported restricting ORV access, often citing designated trails as a good method to limit access.

Snowmachine use was generally perceived as having changed in nature since the creation of the park, with the capabilities of modern machines being more advanced than machines available in the 1970s and 80s. Many comments asserted snowmachine use is not a problem as long as there is adequate snow cover. Conversely, many comments also suggested that snowmachine use constitutes a threat to the backcountry and wilderness of the park. Threats identified from snowmachine use included noise, expanded access due to new snowmachine technology, diminishing use of traditional skills, and negative effects to wildlife. Suggestions regarding the management of snowmachine use included designating routes, closing areas with sensitive sheep habitat, and requiring use of the best available technology (such as 4-stroke engines).

Helicopter use, namely by the NPS, was raised as a threat by many interviewees. It was asserted that NPS helicopter use should be limited and that current NPS use often occurs when other means of transport are available. Interviewees also raised concerns associated with the impacts of helicopters on wildlife and opportunities for subsistence and hunting.

Visitor Use & Impacts

Official Comments

Comments asserted the need for adaptive management if impacts exceed acceptable limits, and the important role of education in minimizing the need for restrictive closures or limitations. Human waste was identified as an issue at popular locations. Requests for establishing limits on group size, including for commercial groups, were also made.

One comment identified that the NPS needs to understand how many visitors are coming to the park and where they are going. Likewise, a request was made that impacts from human activity be quantified and made available as part of this plan.

More stringent regulations on fixed-wing aircraft were requested to prevent negatively impacting visitor experiences and wildlife. Overflights were identified as a threat to visitor experiences. In particular, flight-seeing was identified as a potentially problematic use. Certain uses, such as those for thrill or joy riding should not be allowed in wilderness. Specifically identified uses include jet skis, skydiving, parachutes, and wingchutes.

One comment called for more information on wilderness to be readily accessible – potentially including more information on the website or more focus in the visitor centers.

Interview Content

Comments regarding visitor use encompassed a wide variety of topics. Many comments focused on the undeveloped and solitary character of Wrangell-St.

Elias and asserted that preserving these qualities is desirable. Developments such as trails and signs were predominately advocated against, though a few comments supporting the development of trails and signs were also received.

Campsites were generally perceived as being more impacted by base camping trips and by large groups. Interviewees suggested that camping be discouraged at airstrips, especially for base camping groups. Suggestions also included establishing primitive hardened areas at popular airstrips and instating camp clean-up requirements. Campfires and campfire rings were identified as a threat and it was recommended that their use be regulated or subject to guidelines. In a number of comments,



Hiking through a field of fireweed. Photo by NPS.

garbage was identified as a threat, including garbage and items left behind at old camps, and debris washing up on beaches in the southern portion of the park (e.g., the Malaspina Forelands).

Some interviewees were concerned about overuse, particularly in popular locations which are receiving concentrated use (e.g. Skolai Pass). Temporal concentration of use was also raised, namely regarding overlap of recreational and hunting/trapping use during certain times of the year. Likewise, the disparity between winter and summer use was raised as something to consider in this plan. Generally, comments asserted that seeing a few groups was okay, but after a certain threshold, which varies for different people, seeing others in the backcountry detracts from the experience. Ideas regarding use of a registration or permit system were raised, primarily as a tool that may be needed in the future. Some interviewees requested that regulation and permitting not become similar to Denali National Park & Preserve, wherein emulating that model would not be positive. The freedom and lack of regulations at Wrangell-St. Elias was affirmed as a valuable part of the character and experience here for local and non-local visitors alike.

The idea of Wrangell-St. Elias as a different type of National Park experience was commonly raised. Suggestions focused on how the Backcountry and Wilderness Stewardship Plan needs to acknowledge this difference. The fact that visitors can easily get in over their heads was also frequently brought up and how perceptions of difficulty here, in comparison to the lower 48, can be very different.

Many interviewees called for more education and often specified certain topics, including the history of use in the area, the difference between this park and other National Parks, ANILCA, and specific uses such as packrafting and winter camping. It was expressed that it is important for NPS employees to be knowledgeable about the parklands so they can be a resource for visitors. The general decline in population and decline in the economy of the region was frequently identified as a threat. Interviewees perceived that fewer people are using and experiencing the backcountry and wilderness now than historically. At the same time, many interviewees identified that more visitors are coming to the area because of the park itself.

Various uses of the park such as aircraft use by private pilots, packrafting, mountaineering, pack animals, caving, sportfishing, among others, were also addressed in comments. Most of the comments on these topics were perceptions of how the use had changed over time. Interviewees generally affirmed that these uses are self-limiting, but under certain circumstances, may require regulation at a future date. Aircraft use by private pilots was identified as a threat, and it was recommended that access by private pilots be documented, potentially using a permit or registration system.

Some comments were specific to the southern region of the park, where comments described the consumptive type of uses occurring there and the need for the park to provide economic stimulation.

Commercial Use

Official Comments

Most comments regarding commercial use focused on air taxi use, suggested that air taxis are contributing to overcrowding and other impacts in some areas. One idea for this suggested the NPS work with air taxi operators to identify sensitive areas and prevent overuse of specified areas.

One comment asserted that commercial services are vital to the accessibility of the park by the public, and requested that the plan support existing commercial services.

Commercial filming was addressed in a comment, suggesting that filming is a valuable way to help people see and care about the park, but should only be allowed when “wilderness is the star of the film.”

Interview Content

Comments on commercial use focused on topics that affect commercial operations and pertain to types of commercial activity. Commercial operations include guided sport hunting concessions and commercial use authorizations (CUAs). Air taxis, which operate as CUAs, were also addressed.

Interviewees often perceived conflict between sport hunting guides and air taxis and identified this conflict as a threat to the backcountry and wilderness. The primary suggestions to remedy the conflict were for air taxis to be subject to tighter regulations, and that air taxis operate under a concessions contract. Requests that commercial flight-seeing not be limited in the park were also made. Another common request was for commercial operators to increase the dispersal of their use across the park. The converse of this idea, to concentrate use in some areas and allow the remaining areas of the park to be virtually untouched, was also raised.

Comments regarding commercial operations typically advocated for self-regulation and increased coordination between services, but concerns were also raised about the ability of commercial operations to do so effectively. A common example of this was described to the planning team of how gentlemen’s agreements can work effectively to coordinate use, but if an operator refuses to cooperate, then the system does not work for anyone.

Comments on commercial activities such as commercial filming were also addressed. Interviewees generally perceived an increase in commercial filming activities and identified this increase as a threat.

Of commercial use as a whole, interviewees perceived that there is still some space for additional commercial activity in the park. Likewise, comments reflected a general trend of increasing eco-tourism in operations park-wide.

Subsistence

Official Comments

One comment asserted that subsistence use should be the foremost objective of this plan, and that language declaring preference for subsistence use must be included. This comment also identified meaningful consultation with tribes as a needed component of this plan. Citing Title XIII of

ANILCA, a comment stressed that the terms “frontcountry” and “backcountry” as used in this plan have no legal foundation and must be defined with meaningful input from the public.

Other comments supported ongoing subsistence activities in the park, including one comment that supported use of motorized transport for subsistence uses.

Interview Content

Most of the comments regarding subsistence use were made by a relatively few number of people. These interviewees identified restrictions on ORV and snowmachine use as a threat to subsistence and hunting activities as it would limit access to these resources. However, the sound of ORVs and snowmachines were identified as potentially harmful to subsistence and hunting activities.

Some comments requested additional education for recreational users about subsistence and the traditional uses of this area that continue today.

Cumulative Effects

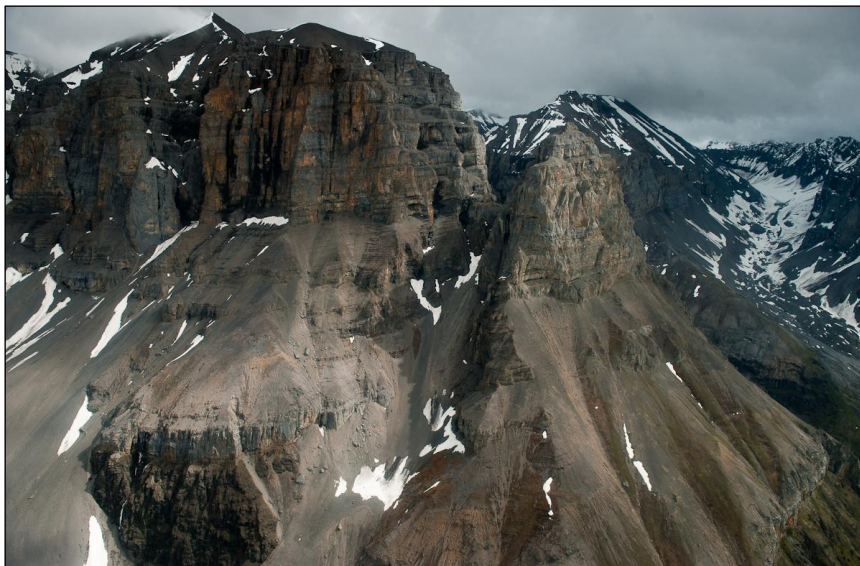
Official Comments

Some comments asserted that cumulative effects needed to be considered. A comment requested that the park’s size and scale be considered when evaluating cumulative effects.

No comments specifically identified methods to do this and rather identified that cumulative effects are incurred from impacts included in the other categories.

Interview Content

The majority of the comments made in the interviews address, and contribute to, cumulative effects. The summary below correspondingly only shows comments that directly address cumulative effects.



Cliffs in Canyon Creek. Photo by Neal Herbert, NPS.

Many interviewees identified the National Park Service as the biggest threat to the backcountry and wilderness of Wrangell-St. Elias. As part of this, many interviewees recommended and requested that this plan not create additional regulations. Interviewees also asserted that the NPS’s own activity needs to be monitored more closely and staff needs to obtain a better understanding of the landscape itself.

Interviewees also identified a need to foster trusting relationships with stakeholders by increasing transparency, communication, and collaboration.

Miscellaneous

Official Comments

A proliferation of scientific instrumentation was identified as an issue in a comment. Likewise, a comment requested that research projects be rigorously examined for their need to occur in wilderness and be evaluated in a consistent method. A few comments identified negative experiences stemming from encountering effects of research (e.g., collared caribou). At the same time, comments requested a need to understand and monitor the effects of climate change and to address the spread of invasive plants and animals.

One comment identified new and developing technology as a threat, including drones, asserting that new technologies should be prohibited by default unless regulations are passed to allow their use. The spread of communications was also identified as a threat and a comment stated that no new communication towers should be built – limited communications are a key part of a wilderness experience.

Multiple comments requested limits on horse use in the park, citing erosion concerns, pathways for invasive species, and other impacts to ecosystems.

Suggestions regarding wildlife included increasing signage of traplines and making publicly available maps of where traplines are located. These comments described incidents between recreational users and traplines as rationale for this request of increased regulation. Regarding wildlife management more generally, one comment asserted that natural wildlife populations should be maintained without emphasizing the population of any particular species, while still providing for subsistence activities. Pertaining to wildlife, one comment suggested that a fact sheet on recreation and wildlife encounters should be made publicly available.

Finally, one comment acknowledged the reality that many activities are difficult to regulate or enforce in Wrangell-St. Elias due to the size of the area and logistics of enforcement. However, this comment asserted that the difficulty of regulation and enforcement is not a valid reason to shy away from actions that are needed to protect wilderness character and resources.

Interview Content

Interviewees asserted that access is predominately self-regulating, between increasing brush levels over time, the difficulty of crossing rivers, and other limiting factors of the landscape. Access in this park is expensive – in terms of money required to fly in, but also the cost in time that a trip here requires. Interviewees generally requested that no new restrictions be placed on access.

How the park is advertised was frequently commented on. Comments requested that the park not become too commercialized. While “too commercialized” is a subjective determination, interviewees asserted that this park should not be advertised and visitors should be able to “discover” it on their own – from finding out that the park exists, to finding out where to go in the park. Likewise, interviewees discouraged sharing information on trips or routes by the NPS and on social media. Conversely, some interviewees requested that the park engage in more advertising. These comments requesting more advertising were generally received from residents of Yakutat.

Comments on the activities of the park itself focused on where the park should expend time and effort. These included increased education for new employees on ANILCA, Alaskan parks and wilderness, and the history of Wrangell-St. Elias. Interviewees requested that the park spend more time and money researching wildlife populations.

Climate change was identified as a threat to the backcountry and wilderness by many interviewees. A few interviewees identified poaching as a threat. Some interviewees asserted that inholdings posed a threat, and should be acquired when possible.

How Comments Will Be Used

Comments received in the public scoping process will inform the next steps of the planning process by refining topics that will be addressed in the plan. Themes in the comments received will drive the management strategies proposed. These comments will inform the development of the Proposed Action, and later will contribute to the Draft Management Alternatives, and Draft Environmental Assessment.



Hiker on the Goat Trail. Photo by Kristi Nelson, NPS.

Summary of Future Steps in the Planning Process

Proposed Action Development

Based on the feedback received in public scoping, a Proposed Action will be developed. This Proposed Action will include delineation of management zones, and will identify the following for each zone:

- desired future conditions of park resources;
- indicators, measures, standards, and thresholds beyond which specified management actions will be taken to reduce human impacts;
- management actions that are practical and appropriate in the event that standards or thresholds are exceeded; and
- mitigation measures that may prevent standards or thresholds from being reached.

It is anticipated that the Proposed Action will be released by the summer of 2016. Public comments on the Proposed Action will be solicited.

Development of Management Alternatives

Based on the comments received on the Proposed Action, a suite of Management Alternatives will be developed. The Management Alternatives will articulate a variety of approaches regarding desired conditions, indicators, measures, standards, and adaptive management actions. Public comments on the Management Alternatives will be solicited.

Draft EA

Based on the comments received on the Management Alternatives, a Draft EA will be developed. The Draft EA will synthesize the management alternatives into a comprehensive document that analyzes the impact topics, environmental effects, and identifies an NPS preferred alternative. Public comments on the Draft EA will be solicited.

Final EA and Plan

Based on the comments received on the Draft EA, a Final EA will be released, accompanied by a Finding of No Significant Impact statement. The Backcountry and Wilderness Stewardship Plan will consist of a short document describing elements of the selected alternative and how they will be implemented.

Opportunities for Public Participation

Staying Up to Date

The plan email list is the best way to make sure you are kept up-to-date about the planning process and opportunities for participation. If you have attended a public meeting, submitted comments, or have been interviewed, you were automatically added to the mailing list and will receive future correspondence. If you want to verify that you are on the mailing list or wish to receive updates via mail, please contact us at the information provided in the “Submitting Comments” section below.

All public involvement opportunities will be publicized through press releases, radio public service announcements, and in project newsletters.

Submitting Comments

Formal comments will be accepted at several stages of the planning process, as outlined above. You can submit comments via email, regular mail, or on the internet at:

<http://parkplanning.nps.gov/projectHome.cfm?projectID=44299>

Written comments may be mailed to:

Wrangell-St. Elias National Park & Preserve

ATTN: Bruce Rogers

P.O. Box 439

Copper Center, Alaska 99573

Comments may be emailed to:

Bruce_Rogers@nps.gov

For more information about the plan or planning process, please contact Bruce Rogers, project manager, at 907-822-7276.



Hidden Lake. Photo by Ed Eberhardy, NPS.

Appendix A – Interview Content

Table 1. Airstrip use and management – interview content

Sub-topic	Type of comment	Comment	# of comments
Airstrip maintenance	Perception	Maintenance of strips degrades the wilderness	1
	Recommendation	Work with CUAs to maintain airstrips	6
		Airstrips need some maintenance by the NPS	6
		Does not want big, well-brushed airstrips as that would open the area up to any pilot or plane	6
		Airstrips should only be maintained for safety & emergency purposes	5
		Do not need more airstrips	5
		Not the park's responsibility to maintain strips; the park shouldn't encourage or discourage airstrips	2
		Focus maintenance on the most important airstrips	1
Airstrip use	Perception	Good strips are important in emergency situations	1
	Recommendation	Airstrips police themselves - overuse damages them and don't receive much use if they're bad strips	2
		Do not manage airstrips or limit number of users at strips	1
Airstrip location	Perception	Wishes there were more airstrips that provided river access	1
	Recommendation	Disperse airstrips to disperse use	4
Advertising	Recommendation	Don't publish info about the airstrips (on website or otherwise)	2

Table 2. Cabin use and management – interview content

Sub-topic	Type of comment	Comment	# of comments
Cabin maintenance	Recommendation	Public use cabins should be maintained – not building new ones, but keeping existing ones	12
		Focus maintenance on historical cabins	3
		CUAs and NPS should cooperate to fix up cabins	2
		Don't actively destroy un-used cabins	2
		Only preserve cabins that are in good shape – let the others go	1
		The public needs cabins and the NPS needs to maintain them; new cabins should be built where needed	1
		Cabin users should be allowed to perform maintenance	1
		Cabins do not need to be maintained	1
		No opinion	1
Cabin use	Recommendation	Should have permit system and fee for use of cabins to offset upkeep costs	2
		Should not be regulated within a permit/reservation system	1
		Remove the prohibition on use of park cabins for more than 7 days in 30 day period and don't prohibit commercial use of cabins	1
		More education on use of cabins	1
Trends	Perception	Cabins are important for winter use and safety; also helps many people feel safer when travelling here	5
		Some cabins are seeing increased activity due to packrafting	1
Miscellaneous	Recommendation	Would like to see a hut-to-hut system along historic trails	1

Table 3. Motorized use – interview content

Sub-topic	Type of comment	Comment	# of comments
ORV use	Perception	ORV use is self-limiting	1
	Threat	ORV access, including to new areas	6
	Recommendation	Restrict ORV access, or at least limit them to designated trails	13
		Restrict non-subsistence ORV use	1
Snowmachine use	Perception	Changing nature of recreational snowmachine use – more powerful machines, no need to break trail, can access areas that were previous inaccessible	10
		Snowmachine use is self-limiting – most of the wilderness is not desirable for snowmachining; rivers, other natural features, and the approach distance keep people out	7
		Snowmachine use is not a problem as long as there is adequate snow cover	5
		Snowmachines are being used for more diverse activities now (e.g., ice climbing, ice fishing, etc.)	1
	Threat	Snowmachine use negatively effects wildlife	2
		Unrestricted snowmachine use	1
		Commercial snowmachine use is a threat	1
	Recommendation	Snowmachine use shouldn't be prohibited, just managed - one way to do this is to designate routes and potentially close some areas	2
		Regulate snowmachines by requiring use of best available technology	2
		Since plane access is prohibitive to many folks, ORV & snowmachine access are important to preserve	1
		Identify critical habitat areas for sheep and prohibit snowmachine access to that area	1
		Commercial snowmachine trips should not be regulated	1
	Helicopters	Perception	Helicopter use for intensive research projects has made bears skittish
Helicopter use is huge impact on hunters			1
Threat		NPS helicopter use	5
Recommendation		Limit helicopter use by the NPS	4
		Get the FAA involved to deal with airspace issues with helicopters	1
Trends	Perception	Increasing levels of motorized use	1

Table 4. Visitor use and impacts – interview content

Sub-topic	Type of comment	Comment	# of comments
Aircraft	Threat	Increased use by private pilots	11
		Overflights and over-use from planes (fixed wing and jets)	4
	Recommendation	Require private pilots to obtain permits from the NPS	1
		Restrict private plane access	1
Campfires	Threat	Use of campfires	2
	Recommendation	Regulate campfire use, or at least provide guidelines	3
Campsites	Perception	Larger groups have more impacts	4
		Base camping has greater impacts than point-to-point trips	3
	Recommendation	Encourage campsites away from airstrips	3
		Consider primitive hardened camping areas at popular airstrips	3
		Prohibit camping with a certain distance of airstrips	2
		Instate camp clean-up requirements and a leave no trace policy	2
Caves	Recommendation	Cave use and users should be considered	2
Cultural resources	Threat	Need for more monitoring to prevent loss of cultural resources	1
Education	Recommendation	More education – topics include: 1) subsistence uses; 2) winter camping; 3) NPS mission and ANILCA; 4) winter camping; 5) packrafting; 6) historic trails and cabins; 7) guide camps and facilities; 8) how people should act around bears; 9) river use	18
Garbage	Threat	Garbage and human impacts; sometimes brought by hunters traveling with air taxis	10
	Recommendation	Some old camps need to be cleaned up	1
Horses	Perception	Horse use has decreased	1
		Horse trails and use are not negative impacts	1
Miscellaneous	Threat	Huge potential for growth off the Nabesna Road and are concerned about it	3
	Recommendation	Minimize use of fuel caches and monitor their use	1

Table 4 (continued). Visitor use and impacts – interview content

Sub-topic	Type of comment	Comment	# of comments
Mountain-eering	Perception	Mountaineering and its effects are limited, and self-limiting	2
NPS	Threat	People are coming here <i>because</i> it's a park	5
		Concerns relating to resident zone communities	4
	Recommendation	Increased ranger presence to assure regulations are being followed; increased backcountry ranger presence in high use areas	3
		More contact with park personnel	1
		NPS should change how it perceives "threats" – social trails and campfire rings are not threats	1
		Should remove historical "trash"	1
Overuse	Threat	Concentrated use in certain areas	7
		Number of people is a threat	2
		Temporal concentration of use during the hunting season	3
	Recommendation	Need more guidance for popular areas and "portals"	3
Packrafting	Threat	Increasing packraft use – could lead to less experienced boaters on difficult rivers	4
Registration	Perception	Flexibility associated with not being restricted to a permit is a positive	1
	Recommendation	Suggests use of zones and a registration system – zone quotes can vary over the year to account for subsistence and other uses	1
		May need to register backcountry users at a future date	2
Regulations	Perception	People are surprised and excited by the minimal regulations here	1
		Freedom and lack of regulations is particularly important to local users	7
	Threat	Concerns about lack of law enforcement	5
Signs	Recommendation	Never install signs	4
Sportfishing	Threat	Increase in day-use sportfishing that will need to be regulated at some point	1

Table 4 (continued). Visitor use and impacts – interview content

Sub-topic	Type of comment	Comment	# of comments
Technology	Perception	Changing and developing technology benefits safety	1
		Many visitors enjoy having minimal communications and leaving their work life behind	1
	Threat	Visitors bring satellite phones, SPOT devices, and GPS devices more often now	4
Trails	Perception	People are looking for a “no trails” experience	2
	Recommendation	No trails should be developed in the wilderness	7
		Need more trail maintenance and hardening of trails in the backcountry and wilderness	1
Trends	Perception	Consumptive purposes are the primary use of the Malaspina Forelands area	5
		Visitation isn’t increasing much, if at all	3
		Increased numbers of hikers on the Malaspina Forelands and outcoast	3
		Increase in moose hunters on the Malaspina Forelands	2
		Huge disparity between winter and summer use	2
		Visitor use is down in the Yakutat area	1
		Visitation has already increased – there’s less solitude, there’s identified travel routes, etc.	5
	Threat	Declining regional population and economic situation has correlated with decreases in use and decreased impacts; includes fewer people engaging in subsistence use	8
Visitor experience	Perception	Visitors can easily get in over the heads and sometimes do – this place is more challenging than expected	7
		Low competition for hunting	6
		Visitors like to feel like they’re the first ones there	4
		Different type of “National Park” experience – Wrangell-St. Elias is a different kind of park and this plan should treat it as such	4
		Recreation use is self-limiting	3
		People have a bad experience when they’re inadequately prepared	3
		Use of technology and increased availability info creates feelings of a "safety blanket" which makes this place more accessible and we will see increased visitation	1

Table 4 (continued). Visitor use and impacts – interview content

Sub-topic	Type of comment	Comment	# of comments
Visitor experience (continued)	Perception (continued)	Visitor use is not a threat	1
		The “unknown” aspect of Wrangell-St. Elias is really appealing	1
	Threat	Visitor use levels – seeing one group is okay, but after a certain threshold seeing other people is negative	4
	Recommendation	Don’t make it like Denali	7
		Have staff that are knowledgeable about the backcountry so they are able to engage with visitors and provide helpful information	4
		Should have no development, including bear boxes, cabins, etc.	1
		Consider hauling out human waste – especially for areas like Donoho Basin	1
		Judicious use of rock cairns to mark trails is not a bad thing - should be allowed	1
		Don’t build facilities for winter use – would increase winter population	1

Table 5. Commercial use – interview content

Sub-topic	Type of comment	Comment	# of comments
Access	Recommendation	People have to see this place to care and want to protect it; commercial operators provide that	1
Air taxis	Perception	Self-regulation between air taxis works in some places and not in others	2
	Threat	Increase commercial use, in particular by air taxis	2
		Air taxis and associated conflicts with concessionaires	8
	Recommendation	Tighter regulations on air taxis, need more accountability for garbage, how many clients they take, and being responsible about their operations	7
		Have air taxis operate as concessions	5
Aircraft	Recommendation	Limit where pilots can land, not the number of pilots	1
Commercial filming	Threat	Commercial filming and increased activity by ‘average joes’	2
	Recommendation	Make more info on commercial filming readily available so it’s harder to break the rules	1
		The park should encourage more, low-impact filming so people can see this place	1
Commercial use levels	Perception	Commercial use is not yet at levels where it would need to be limited	2
	Recommendation	Shouldn’t allow many more, if any, air taxis and commercial operators	1
Commercial use miscellaneous	Perception	NPS generally acts as a neutral party for the CUAs	1
	Threat	Transporters (boat and air) are not adequately regulated and have no incentive to act responsibly	1
	Recommendation	Commercial use is necessary in this park	1
		Keep commercial operations local – keep chain and large businesses out	1
		Not interested in sharing trip info on a calendar	1
		Wishes the permitting process for commercial operations was advertised more	1
		Limit non-consumptive users during hunting season	1
		Implement limits on commercial guides in Donoho, but no limits on private use	1
		If you’re going to limit commercial use, limit the number of operators, not the number of flights	1
		Don’t allow concession owners to have a both a guide business and a transport business	1
Don’t place limits on flight-seeing		1	

Table 5 (continued). Commercial use – interview content

Sub-topic	Type of comment	Comment	# of comments
Concessions	Perception	Concessions are able to “manage” their units to preserve client experiences; this is positive	2
	Threat	Competition with air taxis	4
		Some conflict with air taxis (as opposed to lots of conflict)	1
	Recommendation	Do not allow new guide outfitters when the original owners move on	1
		Supports the current level of NPS management of concessions	1
		Restrict the number of clients and harvest limits for guides	1
		Concessions (and inholders) should be a partnership with the NPS and should work together to address potential threats	2
CUAs	Perception	Idea of volunteer coordination between CUAs is a nice idea, but not realistic	3
		Gentlemen’s agreements can work and have for many years, but can fall apart if someone doesn’t want to play	6
	Recommendation	Need accountability and tighter regulations for CUAs – should be held responsible to take care of the area they are taking people to	1
		CUAs should expect regulation – operating in a National Park comes with it	2
		CUAs should disperse their use across the park	5
		Advocate self-regulation of the CUAs	3
		Need a 3 rd party coordinator for CUAs	2
		Need to increase coordination between guide services	1
		CUAs need to disperse their impacts on popular routes	1
		Use a volunteer coordination system between CUAs – would allow, and maybe prevent, the need for regulations	1
Education	Recommendation	Better, and more, education provided by commercial operators	3
		CUAs should have an annual training on park protocol and ethics	1
Group size	Recommendation	Current group size limits don’t make sense and should be revised – recommends revising group limit to 16	2
		Group size should be based on a client-to-guide ratio	

Table 5 (continued). Commercial use – interview content

Sub-topic	Type of comment	Comment	# of comments
Horses	Recommendation	Don't adopt lower 48 template for horse care here	1
NPS	Recommendation	Need for the NPS to be a participant in the discussion, not a driver	1
		Visitors' expectations have changed – want more comfort; the NPS needs to allow commercial operators to provide that	1
		Hope that permitting here does not become like the Denali model	1
Trends	Perception	Fewer trophy hunters	1
		Guided hunting activity is decreasing	1
		Trend towards increasing eco-tourism park-wide	7

Table 6. Subsistence – interview content

Sub-topic	Type of comment	Comment	# of comments
Subsistence	Threat	Sound of ORVs and snowmachines negatively affects subsistence resources and the ability to hunt in some places	4
		Restrictions on hunters and subsistence activities, including access via ORVs and snowmachines	1
		Not being able to use resource in the ways they have been traditionally used	1
	Recommendation	Prevent recreational use from affecting hunters and subsistence users	2

Table 7. Cumulative effects – interview content

Sub-topic	Type of comment	Comment	# of comments
Desired condition	Recommendation	Request (by interviewee or clients) to keep it the way it is	2
NPS	Perception	The park is too focused on trying to please locals and needs to focus more on the attitude and philosophy of wilderness preservation	1
	Threat	The NPS - as a regulator and bureaucracy, presence of rangers is sometimes negative, managed for the employees themselves, spends money unwisely	11
		Less enforcement, fewer rangers, and less NPS staff presence	1
		Impact of noise by NPS activities	1
	Recommendation	No more regulations	5
		Should not do as many, or as intensive, SARs	1
		Monitor NPS admin activities more closely to prevent resource damage - agency often has a larger impact than the public	5
		Monitor changes on the land by the NPS and get out more - can base any changes on hard facts	4
		NPS needs more transparency and more collaboration with local users	4
	Stakeholders need to be engaged in a meaningful way for this plan to succeed and for the backcountry and wilderness of WRST to be preserved	2	
Regulations	Threat	All park regulations are too complicated	1
Trends	Perception	"...what's acceptable today would've been unthinkable 20 years ago."	1
		No threats	2

Table 8. Miscellaneous – interview content

Sub-topic	Type of comment	Comment	# of comments
Access	Threat	A “rich man's” park since cost of access is so expensive	8
		Lack of access is problematic (people can't get to the park and enjoy it)	1
	Perception	Access is self-regulating / self-limiting	3
		The rivers do a good job of keeping people out and restricting access	1
		Access is decreasing as brush fills in many areas that were previous accessible	1
	Recommendation	No new restrictions on access	1
		Access needs to be more equitable - public lands need to stay public	1
More access and increased winter use		1	
Advertising	Perception	Word of mouth has recently become a more significant factor in attracting people to come here	1
	Recommendation	Don't let the park become too commercialized - the less advertising of the park, the better	4
		Discourage sharing of information – no published routes	4
		NPS should do more advertising (of the Yakutat side)	2
		Promote park visitation, especially in the hard park (lessen burden on preserve areas)	1
Bikes	Recommendation	Allow fat biking (at least in backcountry)	1
Climate change	Threat	Climate change effects as a threat (including brush levels)	7
Horses	Threat	Uncontrolled horses on some inholdings	1
Inholdings	Threat	Inholdings	3
	Recommendation	Purchase isolated inholdings	1
NPS	Perception	Threats change a lot and vary a lot over the years - very diverse; what is a problem today might not be tomorrow	1
	Threat	Impacts of scientific research on wildlife	1
	Recommendation	More training for park rangers on ANILCA, AK, and history of this park	5
		Local users and residents should have more say in the planning process than national voices	1
		Increase coordination with Kluane – make more joint decisions	1

Table 8 (continued). Miscellaneous – interview content

Sub-topic	Type of comment	Comment	# of comments
NPS (continued)	Recommendation (continued)	Emphasize use of science as the basis for decision making	1
		Involve the SRC prior to any rule/boundary changes	1
		No limitations on visitation – the park is for everyone to use	1
The plan	Recommendation	Plan should use zones	1
		Any thresholds developed should be relative to individual site conditions - what one site can accommodate with minimal impact is different than another site	1
Wildlife	Threat	Poaching	2
	Recommendation	Spend more time and money to research and accurately monitor wildlife populations	3
		Change hunting regulations within the existing processes, don't create a work-around	2

Table 9. Outside scope of plan – interview content

Sub-topic	Type of comment	Comment	# of comments
Frontcountry	Recommendation	Development of campground in Kennicott frontcountry (RGT/Jumbo Creek or other location)	2
		The park needs to develop a Frontcountry Plan	2
NPS	Recommendation	Remove all restrictions	1
Wildlife	Threat	Wildlife management by the NPS is inadequate	8
		Changing game regulations	2
		Wildlife regulations are too complicated	1
	Recommendation	Regulate sheep harvest based on number of hunters, not access	1
		Engage in more habitat enhancement for wildlife	1

National Park Service
U.S. Department of the Interior



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