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The Citizens' Advisory Commission on Federal Areas (Commission) has reviewed the 2016 proposed compendiums for Alaska and offers the following comments for the superintendents' consideration.

The Commission sincerely appreciates the opportunity to submit one comment letter on the PEPC website, as opposed to having to submit repeat and individual comments for each park unit. We realize this scenario can create more work for the Service and, should that prove unduly challenging, would not be opposed to maintaining the "per unit" comment opportunities alongside the opportunity to submit more general comments. In this way, commenters could choose which option suits their needs and may minimize the segregation effort which must necessarily occur on the Service's end as a consequence of the sole submission platform.

Comments: The Commission renews its request for the Service to revisit additionally providing opportunities for comments on the annual compendium to be faxed and emailed. Telecommunications, shipping, weather and infrastructure in Alaska can present significant challenges to timely comment submissions through the Internet, hand-delivery and mail. Although it will be another ten years before it happens again, at which time it is hopeful those challenges will be overcome, the Commission would like to note the comment deadline has again fallen on a day when offices are closed and mail service is suspended, making PEPC the only available means of submission. And while the Commission was informed that comments would be accepted by mail or hand-delivery on the next business day, as was promised in the 2015 final compendium, that adaptation was not confirmed in any of the compendium notifications. The simplest solution to accommodate many submission challenges in Alaska, the potential for office closures and also the time difference between Alaska and Colorado, is to allow for fax and email submissions.

Prior statements and federal law, including the recent final rulemaking on closure procedures for park units in Alaska, commit to providing the public with a written justification for each non-emergency restriction, opening and closure. While there is no apparent guidance established for the content to be included in each written

justification, the Commission assumes it would include sufficient information for the public to readily understand why a particular management decision is being proposed. At a basic level, this should include a presentation of the issues prompting action, an exploration of alternatives (particularly less intrusive means) and factors considered by the Service in making its proposal, enabling the public to meaningfully comment on the decision-making process and the result.

This written justification is more important now than ever before, considering the breadth of potential uses it can cover and, most importantly, the length of time the restriction, opening or closure can last. Understanding how the compendiums are generally presented each year, it is not apparent that this justification will be provided at any other time than during the initial proposal. As such, while the public may comment annually on the action itself, the intent and purpose of the action must be presented in full at the onset. This allows an informed assessment at the most critical time, as well as significantly enlightens the opportunity to comment on implementation and continued need over the years to come.

Written justifications provided in the 2016 proposed compendiums would not satisfy this basic threshold. Information on the decision-making process is scant to non-existent. Reasons for closures, where given, are often presented in general terms, rarely specific to the needs or circumstances of the area at issue. Few alternatives or less intrusive means were presented for consideration by the public. Even where very little is at stake, it is imperative that significantly more information be provided in each instance. Further, offering a written determination of need “on file at park headquarters” (as noted in the proposed closure for Kenai Fjords National Park) is of almost no value to commenters during the closure process.

While the justification for each proposal merits supplementation, the Commission strongly recommends postponing the proposed camping closure in Katmai National Park and Preserve until a written justification is submitted to the public to fully explain the proposal, the calculus behind it and the potential for less intrusive means short of closure, so that informed comments can be provided for the superintendent’s consideration. Additional stakeholder engagement may also be helpful to draw out shared concerns and increase the potential for buy-in, compliance and sound long-term management.

Thank you for this opportunity to comment, and for continuing to work collaboratively with the Commission. The Commission has long appreciated the Service’s willingness to provide early insights into the proposed compendiums and being consistently available for constructive dialogue. If you have any questions or require more information or dialogue on these issues, please do not hesitate to inquire.

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