



Aldo Leopold Wilderness Research Institute

790 E. Beckwith Ave.
Missoula, Montana 59801
(406) 542-4190 FAX (406) 542-4196

USDA - Forest Service and USDI - Bureau of Land Management, Fish and Wildlife Service, Geological Survey, and National Park Service

April 9, 2013

Susan Magee, ANILCA Program Coordinator
ANILCA Implementation Program
Office of Project Management & Permitting
550 West Seventh Avenue, Suite 1430
Anchorage, AK 99501

Thank you Susan for compiling the comments from various State agencies on the proposed Arctic National Wildlife Refuge survey of recreation visitors in 2013. We will include your full letter in the final documents we provide to OMB, as well as this response letter. We begin our response with some general comments that we think will be helpful in justifying our responses to your specific input. Then we list some specific things we are doing in response to your comments on purpose of the study, methods proposed and specific items in the survey.

As a general comment, we'd like to clarify the outcome of the 2008 Visitor Survey Pilot Test that you mention in your letter: The process of obtaining OMB clearance for information collection from the public is a vigorous, high integrity process requiring peer review, statistical review and response to public comments, followed by intensive review and negotiation with the Office of Management and Budget. We appreciated the input received from the State of Alaska for planning and testing that took place in 2008. In 2007 and 2008, there was an effort to obtain OMB clearance for longer term monitoring at the Arctic Refuge, but after initial approval of the specific questions and methods proposed for visitor contact, the OMB officer requested we collect only enough data to test the visitor contact process and demonstrate the value of the analysis process. It was a temporary, conditional approval.

While the exercise was helpful in providing greater insight into the complexities of contacting visitors and the data collected were helpful in demonstrating the value of this information to Refuge planning, it was mutually decided not to seek long-term OMB clearance at that time. The original request was for consideration for clearance for a minimum of two data collection years, with the hopes that a long-term monitoring program could eventually be proposed and implemented. OMB did not reject this application for clearance, but was very helpful in working with us to struggle through testing visitor contact methods and demonstrating data analysis methods that could be put into place to allow monitoring change over time, instead of proposing and conducting a visitor study once every 30 years.

OMB, our peer reviewers, and the Agricultural Statistical Service have not expressed concern over the scientific merit of the scales used, the intended effort to approximate the population of visitors (in lieu of carrying out the impossible task of a random sample of visitors to such a remote location), or the proposed analysis process. Rather the weakness, as has been clear from State comments, is mostly in trying to obtain useful information about the current attitudes of

recreation visitors to this place that will help managers in meeting their recreation management responsibilities, without delving deeply into other policy questions that remain in the realm of negotiation between the State and Federal authorities related to subsistence uses, energy exploration, and wilderness designation. It has never been the intent of the visitor survey proposed for the Arctic Refuge to question Federal or State positions on these matters. We appreciate the State's suggestions on wording of survey questions and the stated intent of the study to help us avoid those pitfalls.

The Leopold Institute has engaged with their federal partners in this type of recreation research in many places in Alaska over the last 10 years, always cooperatively with, even sometimes partially funded by, the State of Alaska, most notably in studies at Denali, Wrangell-St. Elias and on the Situk River. In response to the State's suggestion that we introduce a full discussion in the Support Statement of how ANILCA amends the Wilderness Act in Alaska, we have added text directly from a recently published, peer reviewed summary of how ANILCA drives wilderness recreation experience management and research in Alaska, both inside and outside of federally designated wilderness. We are attaching a web location of that article (<http://leopold.wilderness.net/pubs/767.pdf>) for the State and have now referenced it within the Support Statement. Our OMB officer may wish to examine this source as well to gain an understanding of the several projects conducted in Alaska by the Leopold Institute, which have focused on managing special provisions defined in ANILCA. ANILCA is very complicated, described in that article as applying as a special provision to the Wilderness Act, and which carries its own special provisions; many of them. The one most relevant to some of the State's comments on the Federal Register Notice, and that applies to the Arctic Refuge is that provision to protect "wilderness resource values and related recreational opportunities" (ANILCA Section 101b) across the federal system of protected areas established by ANILCA. It appears there remains some differences in beliefs about whether this provision applies across non-wilderness lands of the Arctic Refuge. In the revised questionnaire, however, visitors are never asked about "wilderness recreation experiences," only about the things that influenced their experiences while visiting the Arctic Refuge. We hope this change has solved the concern expressed by the State.

Your specific comments on the Federal Register Notice and the study are truly appreciated and we have made an attempt to address these to improve the data collection effort and the value of information collected.

1. In reference to the State's suggestion that we improve upon the tested method of visitor contact, we have taken two steps that are reflected in the revised support statement. First, a more intense effort to contact visitors through the air pilots is planned. From earlier testing, we know where we were successful and where we were not. Second, we do plan on pursuing contact with the 2012 hunter population, as the State suggested, rather than waiting for the 2013 roster availability. We also believe that by slightly extending the data collection time frame will allow for more of the 2013 hunters to be surveyed. We know that hunting is an important recreational use of the Arctic Refuge and will work had to include hunter responses. Whereas we typically avoid multiple contacts with visitors in a study, in this case, having data from a person on the hunter roster in 2012 and making contact during a visit in 2013 seems okay, asking about two very different trips in different years. They could be to different places, organized in different ways. While the Refuge's resources are limited for conducting the visitor contact tasks, collectively we have been able to add funds in order to hire a project manager that we did not have during testing in 2008 and an additional person to process hunter roster data. The local project

- manager will spend time on the phone with air taxi operators and the visitor center staff at Coldfoot, making sure supplies at kiosks are resupplied, and validating self-issue efforts to contact visitors. Once first contact is made, our testing of methods suggests that we can achieve acceptable response rates through a combination of electronic and mailback methods.
2. While this study is not solely aimed at replicating the 1977 survey, opportunistically, it is desirable to update demographic information, group composition data, trip characteristics like group size, length of trip, activity engagement, method of transportation, etc. However, we never intended to repeat every question from this graduate student project in the 1970s. There are some sections of that research that has not been influential in management decisions at the Refuge, though it may have contributed to the general recreation literature, and will not be repeated in the 2013 study. A new set of management and planning issues is driving this study, mostly the need right now for insight into what current visitors are expecting and prefer in terms of things that influence their experiences on visits to the Refuge, and how they might respond to options for visitor use management in the future. Refuge staff and their partners, including the State of Alaska, will be able to use the results of this study to inform the process of developing a required visitor use management plan and a wilderness stewardship plan.
 3. The data from the 1977 study are not available in the public sector for direct statistical comparisons, though through the use of confidence intervals from the 1977 sample and consideration of the 2013 data as approximating population levels, comparisons can be made and discussed on those variables which are repeated.
 4. We agree that we must be able to identify and separate data from different user groups. While we did not follow up with the analysis of the test data set in 2008 to demonstrate the value of examining all group differences, that is certainly the intent of this more intensive effort to make visitor contact in 2013. Understanding guides engaged in recreation services and others working in the Refuge are interesting, but not the primary purpose of this research. Similarly, a point of contention is on whether to include rural village residents who continuously go back and forth into the Refuge for a variety of purposes related to subsistence or traditional activities. The managers of the Arctic Refuge have other, parallel methods of seeking and considering input from local residents on the range of uses they engage in on the Refuge. There is no plan to expand this survey beyond non-local recreation visitors. The Refuge will capture information about local uses, expectations and preferences during scoping and public involvement, as required by the National Environmental Policy Act, when it develops the two step-down plans previously mentioned. The Refuge will also conduct formal consultations with local tribal governments before public scoping begins.
 5. The State suggested we include the opportunity for visitors to indicate, on a map, locations of trash they encountered, similar to the 1977 study. It is believed by managers that visitor behaviors have changed substantially since the 1970s and while there will always be some trash left by visitors, this is not a high priority information need at this time. Question C2 in the revised questionnaire is designed to capture visitors' expectations for seeing these types of impacts, but it does not capture specific location.

We will know the general location from information collected in items A2 and A3 of the revised questionnaire.

6. It is the intent of the federal government to reduce the burden on the public for information collection activities such as this one, in every way possible. One way to do that is to make the data collection activity available over electronic media, for those desiring and capable of engaging in that response format. Things have changed even since 2008 testing and we believe that the electronic response format will be easier to access without downloading software upgrades by most people. However, every visitor is also offered a written, mailback survey both at the time of contact and when they receive instructions for electronic response. In the 2008 testing, we found a higher proportion of visitors requesting electronic versions of the survey, but the response rates were slightly higher for mailback respondents. Electronic overload for all of us has probably increased since 2008, and although more people have access to electronic applications and the technology is there to make it generally usable, we would still expect those who decide to do the survey in hardcopy to be more likely to follow through on the task.

We thank you again for comments and suggestions. As you know, Dr. Jeffrey Brooks has taken many of your specific wording suggestions and incorporated them into the written form of the questionnaire. I am sending a copy of the revised questionnaire to you for your examination. You will notice that the questionnaire now allows us to more readily identify and separate respondents who were working in the Refuge when they were contacted. The questionnaire has also been revised to more accurately identify sources of information for trip planning purposes. We have removed repetitive questions to streamline the survey and have redesigned it to focus more on refuge management and how it can protect visitor experiences. We are confident that this data collection effort will capture the preferences and expectations of all visitor groups and contribute substantially to the planning process.

Sincerely,

ALAN E. WATSON
Supervisory Research Social Scientist