

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

□ 550 WEST 7TH AVENUE, SUITE 1400
ANCHORAGE, ALASKA 99501-3650
PHONE: (907) 269-8431
FAX: (907) 269-8918

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE COMMISSIONER

November 10, 2009

LeRon E. Bielak
DOI Strategic Planning Coordinator
Planning and Performance Management
Office of the Secretary
Department of the Interior
1849 C Street, NW, Mail Stop 5258
Washington, DC 20240-0001

[For submission electronically to StratPlancomments@ios.doi.gov]

Dear Mr. Bielak:

This letter responds to the September 11, 2009 Federal Register Notice, seeking comment on the Department of the Interior (DOI) "*Strategic Plan Framework as Input for Revision and Updating of the Departmental Strategic Plan.*" This Strategic Plan, designed to guide DOI through 2015, covers a broad range of topics. These consolidated state agency comments address selected issues of importance to Alaskans.

Overall, we appreciate DOI's efforts to update its Departmental strategic plan. We recognize that new issues, such as climate change, necessitate a review and update of the plan. Given that many issues are shared by states, we urge greater coordination with states in the development and implementation of the plan. Many of the issues identified will require greater collaboration if the strategic initiatives are implemented. We urge you to work directly with states to insure a coordinated response during subsequent tiers of strategic planning. Direct state participation in development of the plan is more effective than writing a plan internally and submitting it for public review.

We also recognize the challenge of attempting to provide national strategic direction without constraining local and regional efforts to solve problems. Oftentimes, the best solutions are those tailored to respond to specific local or regional circumstances. Too much prescriptive direction limits the ability of field managers to find creative solutions.

Climate Change

While we understand the importance of thinking strategically about climate change, we question the timing of the US Fish and Wildlife Service (USFWS) nearly simultaneous efforts to address the same topic. The draft USFWS *Strategic Plan for Climate Change* was published in the Federal Register just four days after the DOI announcement of the upcoming Department-wide Strategic Plan revision. We are concerned this overlap will cause confusion, potentially hampering both efforts. The State of Alaska's separate comments on the USFWS Plan will also be useful to consider during development of the Department-wide Plan.

"Develop, Conserve, and Enhance Natural Resources for Present and Future Alaskans"

The recently released report titled "*Climate Change Adaptation, Strategic Federal Planning Could Help Government Officials Make More Informed Decisions*" by the U.S. Government Accountability Office noted "*a general lack of strategic coordination across agencies*" in addressing climate change. We see this already within the Department of Interior, with individual agencies/bureaus positioning themselves for future funding opportunities. We applaud the Secretary's initiative to better coordinate the various DOI agencies/bureaus response to climate change through the establishment of the Climate Change Response Council. We urge the Secretary to include state, Native, and regional representation on this Council to assure that strategy development meets local needs.

We also applaud the establishment of the Climate Change Response Centers. The State looks forward to working with these centers on the development of meaningful climate change strategies. State agencies, which have trust responsibilities over fish and wildlife resources, have much to offer. We recommend that DOI efforts also be coordinated with other federal agency efforts, such as those of the Department of Commerce.

The DOI strategy currently calls for the development of a national strategy, which will inform development of regional strategies. Nearly everyone understands that the effects of climate change will differ regionally. This is evident in the consistently identified need for development of step-down climate and decision models. Diverting attention to development of a national strategy will likely hinder regional and local identification and prioritization of issues and associated strategies to address them. This approach will further hinder innovation and local support necessary for implementation. For a national strategy to be successful, we recommend a bottom up approach rather than the top down model reflected in the current plan.

The current Plan seems to rely on Landscape Conservation Cooperatives and Strategic Habitat Conservation Initiatives to frame the conservation strategy. Other conservation programs, many of which are ongoing and successful as strategic conservation programs, appear to be excluded. We suggest expanding the focus to acknowledge the benefits of ongoing programs, such as the existing regional bird conservation efforts or, in Alaska, existing partnerships such as the North Slope Science Initiative.

Because of high uncertainties associated with forecasting, shorter time frames should be examined for development of adaptation strategies. Planning for the next 15-25 years will be the most meaningful.

We recommend recognizing, wherever applicable, the role of the states in fish and wildlife management. We are also concerned that many of the recommended strategies will result in unfunded mandates to States and local governments.

Energy Independence

The United States will be reliant on conventional sources of energy for many years to come. Therefore, developing new sources of conventional energy will remain critical to secure energy independence for our Nation, even as we simultaneously work to develop alternative sources of energy. The Nation's outer continental shelf, especially adjacent to Alaska, holds promise for discovery of significant quantities of oil and gas. DOI should continue to encourage responsible exploration and development of the outer continental shelf.

Non-Energy (Mineral) Resources

As with conventional energy resources, the United States cannot afford to turn its back on the development of domestic mineral resources. Alaska again offers outstanding opportunities for responsible mineral development, complete with a commitment to environmental stewardship to protect other natural resources from harm. To expand on the Nation's existing mineral base, we encourage DOI to facilitate the exploration and development of federal multiple use lands in Alaska.

As with other elements of this Strategic Plan, successful refinement of existing performance measures for the reclamation of older mines will require additional consultation with the states and representative agencies and organizations. Thus the State of Alaska endorses the November 6, 2009 comments from the Western Interstate Energy Board, including formation of a cooperatively developed work plan to evaluate potential improvements to the mining reclamation performance measures.

Access to Resources on Federal Lands

Page 15 of the resource use section of the existing Strategic Plan states:

Managing resources has become increasingly more complex. Today, we are often called upon to determine where, when, and to what extent renewable and non-renewable economic resources on public lands should be made available. That task demands that we balance the economy's call for energy, minerals, forage, and forest resources with our resource protection and recreation responsibilities. Interior conducts research on and assessments of undiscovered non-fuel mineral and energy resources, which assist the Department's land management agencies in their goal of providing responsible management of resources on Federal lands.

In Alaska, access to resources is key component of resource development. Large areas of resource-rich public lands in Alaska lie far from existing roads or other suitable infrastructure. We therefore recommend adding a policy section addressing access to resources on federal lands. In light of provisions in Title XI of the Alaska National Interest Lands Conservation Act that set out a rigorous process for consideration of transportation and utility systems, some Alaska-specific guidance may be warranted.

Alternative Energy

The State of Alaska appreciates DOI's increased attention to alternative energy sources. While the country will remain dependent on traditional fossil fuels for the foreseeable future, DOI can reduce this dependency by supporting locally-based solutions that take advantage of local and regional renewable and alternative resources. A one-size-fits-all approach would stifle innovation and should be avoided. Fostering local solutions will also facilitate economic diversity. We encourage directing existing research dollars to projects that have the greatest potential for positive outcomes. Sometimes projects that lead to the greatest gains in technological innovation are small scale. Alaska has a wide range of alternative energy sources (e.g., wind, geothermal, tidal) that may merit technical or financial assistance to advance economic development and innovation.

Fire Management

A close working relationship between the various DOI agencies via the Alaska Fire Service (AFS) and the Division of Forestry (DOF) is critical for our collective futures. In the past six years over 15 million acres have burned in Alaska with the first, third and ninth largest years for acres burned represented in this timeframe. Joint construction and maintenance of facilities, especially in McGrath, and for a future joint fire warehouse and logistics center in Fairbanks should be considered and encouraged. Joint staffing of offices to ensure appropriate experience levels should

be considered and increased training for rural fire crews should be undertaken to enable crews to attain Type II-IA status where feasible.

Commitment to the Alaska Interagency Fire Management Plan should be affirmed and working relationships with the U.S. Fish and Wildlife Service and the National Park Service should be strengthened and incorporated into existing annual operating agreements and the master agreement between AFS and DOF with regard to initial attack, fire operations and project fire management.

The fire aviation program needs to continue the current flexible approach that allows the use of state contracted aerial retardant tankers (Convair 580s) on federal lands. This arrangement compliments the water scooping capabilities of the federally contracted CL-215s and allows the best-suited aerial resource to be used on fires regardless of the underlying land ownership.

Relations with Alaska Natives

The State of Alaska believes that both the State and Federal relationships with Alaska Natives is, and should be, based on mutual respect and understanding. With this in mind, we recommend robust consultation with the State and Alaska Natives before the DOI takes any action affecting these relationships or the State's interests.

Subsistence use plays an important role in the lives of rural Alaskans. As stewards of fish, wildlife, and their habitat, we recognize and respect the practical and cultural role subsistence plays. Again, we recommend consultation with the State before any action is taken that may alter the way in which the Federal government addresses subsistence.

Instances of domestic violence and sexual assault continue to be of great concern in rural Alaska and to State government. The Governor recently expressed strong support for a law enforcement presence in every community that desires a law enforcement official. This could be accomplished by funding an additional 15 Village Public Safety Officer positions per year for the next 10 years.

An increased law enforcement presence is but one aspect of achieving the goal of combating domestic violence and sexual assault throughout the State. The State will be seeking funding to support this effort. We believe that the DOI has a significant role to play in addressing these issues.

The State recommends that the DOI invest resources to combat domestic violence and sexual assault in Alaska. Such resources may include, but are not limited to, educational and preventive outreach, law enforcement support, and victims' services.

We also urge that the DOI recognize the unique body of law and policy that governs certain aspects of the relationship between the Federal government and Alaska Tribes and Native corporations in the aftermath of the Alaska Native Claims Settlement Act of 1971 and the US Supreme Court's decision in *Venette*. ANCSA established a new approach to US Indian policy in Alaska, and revoked existing reservations except for Metlakatla. In *Venette*, the Supreme Court found that, except in rare instances, there is no Indian country in Alaska. In our opinion, the DOI should recognize this history as it develops policies applicable to American Indians and Alaska Natives.

November 10, 2009

Page 5 of 5

The State of Alaska appreciates the opportunity to submit these comments. If you have any questions, please contact Samantha Carol at 907-269-8431, or by email at samantha.carroll@alaska.gov.

Sincerely,



Thomas E. Irwin
Commissioner