

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SEAN PARNELL, Governor

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Kent Nicholson, Acting District Ranger
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P.O. Box 19001
Thorne Bay, AK 99919-0001

Francisco Sanchez, District Ranger
Tongass National Forest, Craig Ranger District
P.O. Box 500
Craig, AK 99921

Dear Mr. Nicholson and Mr. Sanchez:

The State of Alaska reviewed the March 2012 Prince of Wales Island Outfitter and Guide Management Plan Environmental Assessment (EA). The following comments represent the consolidated views of the State's resource agencies.

We appreciate the Plan's clear acknowledgement that the public and the commercial transporters they depend upon will not be affected by this plan, and recommendations for increased allocation of service days to outfitters and guides, with the exception of a few highly utilized areas. Outfitters and guides provide unique opportunities to the visiting public and local residents who may not have the means or skills to access public lands on their own, particularly for hunting or fishing.

Although the Wilderness Needs Assessments are now available for public review, as we noted in our scoping comments, the plan still lacks clearly identified user conflicts in the low use designated wilderness areas to justify closing specific areas to certain types of outfitting and guiding. We recommend leaving these low use areas available for all types of outfitter and guide activities. A monitoring process and adaptive management would likely address any future issues that develop, i.e., a specific conflict can be adaptively addressed by the appropriate administrative entity (federal or state) using the appropriate tool. In certain instances, state management tools may be more effective than federal tools, so we recommend looking at all available options.

The EA indicates that service days will be restricted where there are fish "species of concern" in the proposed action (Page 40). We understand that the Service considers steelhead, sockeye, and coho species of concern due to their importance to subsistence users, relatively low abundance,

and run timing. The Alaska Department of Fish & Game (ADF&G), which is responsible for the sustainability of fish and wildlife on all lands in Alaska, identifies fish stocks of concern using three categories: yield, management, and conservation. If fish stocks of concern require regulatory action, we request the Service utilize the appropriate regulatory entity, i.e., the Alaska Board of Fisheries or the Federal Subsistence Board. Any unilateral efforts by the District to minimize user conflicts, based solely on allocation concerns, would circumvent these existing regulatory processes. ADF&G is available to assist the Service during preparation of Board proposals, if necessary.

Lastly, the Affected Environment Wilderness discussion (Page 87), which focuses on “generally prohibited” activities in designated wilderness is incomplete and inaccurate. While the Alaska National Interest Lands Conservation Act (ANILCA) is referenced, there is no recognition of several relevant provisions, including Sections 1315 regarding cabins, and 1316 regarding temporary facilities and equipment related to the taking of fish and wildlife, which provide exceptions for wilderness areas in Alaska. In addition, Section 1110(a) states, “*the Secretary shall permit, on conservation system units...nonmotorized surface transportation...subject to reasonable regulation*” which includes mechanized modes of transportation, such as bicycles. Section 811 provides for subsistence access, “*The Secretary shall permit on public lands... surface transportation traditionally employed...subject to reasonable regulation.*” Any restrictions to ANILCA protected access in designated wilderness, including group size limits, must be implemented by formal regulation. While the Forest Plan may “generally prohibit” groups greater than 12 individuals, to our knowledge no such limit has been implemented by regulation. We request the final plan provide a broader discussion of ANILCA exceptions and recognize that the encounter rates and group size limits addressed in the Forest Plan are guidelines and, unless implemented by regulation, are not prohibitions.

Thank you for the opportunity to comment. Please contact me at (907)334-2563 if you have any questions or concerns.

Sincerely,



Nina Brudie
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator