



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT & PERMITTING

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September 10, 2012

Bill Overbaugh, Alaska State Office
Bureau of Land Management
222 West 7th Avenue, Suite 13
Anchorage, AK 99513

Dear Mr. Overbaugh:

The State of Alaska reviewed the scoping notice for the Hunting Guide Capacity Environmental Assessment (EA). The following comments represent the consolidated views of the State's resource agencies.

The State has been working cooperatively with the Bureau of Land Management (BLM) in its efforts to develop a Guide Concession Program (GCP) to implement on state lands. The mission of the State's GCP program is to encourage land stewardship, support wildlife conservation, and to promote a healthy guiding industry to benefit the people of Alaska. We encourage BLM to continue to work closely with the State during the development of this EA. Close cooperation will benefit both programs, as well as users, by providing a consistent approach across State and BLM lands.

The scoping notice indicates the goal of the analysis in the EA is to "...*determine the proper allocation of commercial hunting guide permits per Guide Use Area based on user conflicts and social issues associated with commercial hunting guides*" and that BLM is seeking public input through scoping on user experiences in specific guide use areas on which to base the EA analysis and alternatives. We request the EA clearly identify known and anticipated user conflicts, by providing examples of past and current conflicts; or those identified by the public through scoping comments. If BLM receives limited input through scoping, we recommend conducting additional public outreach, such as public meetings similar to the State's efforts, to ensure issues are accurately identified and addressed the EA.

The State of Alaska is responsible for the sustainability of all fish and wildlife within its borders – regardless of land ownership or designation – and has the authority, jurisdiction, and responsibility to manage, control, and regulate fish and wildlife populations, including for subsistence purposes, unless specifically preempted by federal law. The Alaska Department of Fish and Game, if necessary, utilizes emergency orders to maintain that sustainability. We request the EA recognize the State's authority and clarify that issuance of Special Recreation Permits under BLM's authority will not indirectly allocate fish and wildlife.

Additionally, the Alaska Boards of Fisheries and Game allocate fish and wildlife among all user groups, provide a subsistence preference on all lands, and can address both direct and indirect effects pertaining to fish and wildlife. The Federal Subsistence Management Program (i.e., Federal Subsistence Board) may regulate the opportunity for rural residents to harvest fish and wildlife on federal lands, as provided under Title VIII of the Alaska National Interest Lands Conservation Act. These federal regulations, at times, may supersede state harvest regulations. Any unilateral action by BLM under the proposed Guide Concessions Program to minimize user conflicts, based solely on allocation concerns, would circumvent these existing regulatory processes. We therefore request the EA recognize these existing authorities and processes and commit to utilize them to the greatest extent possible.

Lastly, while we recognize fees will be charged, we recommend against a cost prohibitive fee schedule. High fee structures could result in decreased participation in Alaska and transference of effort to other areas such as Canada and Russia, which could have significant economic impacts that warrant consideration.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Susan Magee
ANILCA Program Coordinator