



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

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December 4, 2013

Carol Goularte, District Ranger
Sitka Ranger District
Tongass National Forest
204 Siginaka Way
Sitka, Alaska 99835

Dear Ms. Goularte:

The State of Alaska reviewed the United States Forest Service (USFS) Draft Scoping Notice for allocation of recreation capacity for commercial outfitter/guide services on North Kruzof Island trails, located near Sitka, Alaska. This letter provides consolidated comments from State agencies.

We strongly support increased opportunities for recreational activities, including guided recreational activities on national forest lands. However, the information provided with the scoping notice makes it difficult to determine how the proposed management strategy for authorizing commercial use of the Kruzof Island road and trail system was determined, and how it will affect current use of the existing systems.

We recognize the scoping document states: *“Additional documentation, including more detailed analyses of project area resources, may be found in the project planning record located at the Sitka Ranger District Office in Sitka, Alaska.”* However, to provide important context for the proposed action, we recommend the EA include the following information:

- The basis for the outfitter/guide’s 20% allocation of the estimated visitor capacity across the board;
- Any potential effects to public access and use of the area, including potential user conflicts.
- To whom the closure described for the Large Group Area (LGA) near Eagle Creek during the 11 additional days of the brown bear hunting season for outside drainages in Game Management Unit 4 applies (That is, does it apply to guided hunters, the non-guided public, and/or non-hunting outfitters and guides?).
- An ANILCA Section 810 analysis, which describes subsistence resources in the area and the potential effects of the proposed action on subsistence use and access.

We understand the proposed plan appropriately focuses on outfitter/guide use of USFS uplands; however, we request the document include recognition of the following state requirements to provide a more complete context:

- Related outfitter/guide incidental activities occurring below mean high water on state-owned tide and submerged lands and shorelands must meet the State's "generally allowed use" criteria (11 AAC 96.020) or authorization from the Alaska Department of Natural Resources, Division of Mining, Land and Water (DMLW) will be required.

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

Sincerely,



Jennifer Nolan Wing
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator
Clay Davis, USFS, Lands Minerals, Special Uses Administrator