



March 18, 2015

Chad Van Ormer  
Monument Ranger  
Admiralty National Monument  
8510 Mendenhall Loop Road  
Juneau, AK 99801

Dear Mr. Van Ormer:

The State of Alaska reviewed the February 2, 2015 scoping notice for the Angoon-Mitchell Bay Outfitter Guide Environmental Assessment (EA). The following are consolidated State agency comments.

We support the effort of the U.S. Forest Service (Service) staff to involve the public and organize meetings in Angoon very early in this planning effort. We also support, in general, increased opportunity for recreational activities, including guided recreational activities. Outfitting and guiding opportunities are extremely important to the economy of Angoon and the remainder of Southeast Alaska.

We support the inclusion of the Kootznoowoo Wilderness Commercial Needs Assessment (WCNA) and the Angoon-Mitchell Bay Visitor Capacity Analysis (VCA) in the scoping material. As these documents are the basis for several decisions proposed by the Service, doing so will provide the public with its first opportunity to review and meaningfully comment on the recommendations in the documents.

As your Notice referenced, the Alaska National Interest Lands Conservation Act (ANILCA) Section 506(a)(3)(E) requires the Service to consult and cooperate with Kootznoowoo, Inc. in the management of the Mitchell, Kanalku, and Favorite Bays and provides the Service with the authority to enter into cooperative agreements with Kootznoowoo, Inc. **We encourage the Service to continue conversations with Kootznoowoo, Inc. to reach consensus on public access to their corridor lands consistent with ANILCA access provisions (which allow motorized access under Section 810 and 1110) and to establish a cooperative agreement with them on management of these areas.** We also note that Section 1307 of ANILCA provides for the continuation of existing visitor services in conservation system units (CSUs). This section also requires the Service to give, notwithstanding other provisions of law, preference to the Native Corporations most directly affected by a CSU and to local residents in contracting for the provision of any type of visitor service, except guided fishing and hunting activities.

We are concerned that the proposals outlined in this scoping document do not fully consider the implications of the land status in the planning area. Much of the tourism and recreation that will occur in the area of the proposed action will be on state owned waters and Kootznoowoo corridor lands. As referenced in the scoping document, corridor lands are specifically exempt from the provisions of the Wilderness Act (ANILCA Section 506(a)(3)(D)). Yet, the tone of the scoping documents emphasize wilderness practices: "All outfitter and guide use will be non-motorized activities." "Maximum commercial recreation group size is seven (7) including guide." We recognize how the group size was determined from the VCA; however, we believe that at this point in time, group size is self-limiting in the area (amount of people who can fit in a floatplane or six-pack vessel) and does not need to be regulated. **We request that group**

size not be limited through this document and instead follow the group size limit of 12 found in the current Forest Plan (Chapter 3 Management Prescriptions, Wilderness and National Monument Recreation Use Administration: REC3, Recreation Management and Operations C.1. and Outfitter/Guide Operations A.4.). If, in the future, the need for consideration of more stringent limits develops, we would encourage the Service to work with Kootznoowoo, Inc., as outlined in ANILCA Section 506(a)(3)(E). Instead of limiting recreational opportunities through this document, we encourage the Service to look at ways to work with Kootznoowoo to develop compatible recreational facilities, concessions, and educational kiosks on corridor lands that can assist the community of Angoon with their economic development interests and challenges, and provide additional opportunity for local employment.

**We recommend that instead of using “the concept of ecotourism for allocating recreation commercial services in Mitchell Bay”, the direction found in ANILCA Section 506(a)(3)(E) be used, and the wording be changed to : “Tourism will be developed in a manner that preserves the natural and recreational values of the Monument with economic and cultural needs and expectations of Kootznoowoo, Inc.”** We request that the Service work with Kootznoowoo, Inc. to determine the characteristics they desire in local tourism activities instead of imposing characteristics determined by the United Nations Education, Scientific and Cultural Organizations, as indicated in the scoping notice.

To enable the user to determine where the plan applies on the ground and for future enforcement purposes, **please include a map in the EA that delineates the boundary of the Monument and corridor lands.**

#### Fish and Wildlife Management

We remind the Service that the State is responsible for the sustainability and management of all fish and wildlife, including for subsistence purposes, regardless of land ownership or designation, unless specifically preempted by federal law. The Alaska Department of Fish and Game manages on the sustained yield principle, and when necessary, utilizes emergency orders to ensure sustainability of fish and wildlife. The Alaska Boards of Fisheries and Game determine issues related to the allocation of fish and wildlife among all user groups, including for subsistence.

The Federal Subsistence Board assures a priority, under ANILCA Title VIII, for subsistence opportunities among consumptive uses of fish and wildlife by rural residents on federal lands. At times, the state and federal boards have worked together to address issues of mutual concern. Please note that these existing regulatory processes are the appropriate venue for addressing any issues related to harvest allocation or methods, in the event that such issues are raised during the planning process.

#### Angoon Airport EIS

We request that the EA address how the proposed Angoon Airport may or may not affect the proposal for Favorite Bay.

We look forward to reviewing the forthcoming EA. Please add me to your project distribution list. If you have any questions, please contact me at (907)334-2563.

Sincerely,



Jennifer Wing  
ANILCA Project Coordinator

cc: Susan Magee, ANILCA Program Coordinator, Darrin Kelly, Permit Administrator, Admiralty Island National Monument