

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

STEVE COWPER, GOVERNOR

STATE CSU COORDINATOR
2600 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2798
PHONE: (907) 274-3528

June 29, 1989

Mr. Michael A. Barton
Regional Forester
P.O. Box 21628
Juneau, AK 99802

Dear Mr. Barton:

The State of Alaska has reviewed the proposed rule at 36 CFR Part 241, which provides management direction for the conservation of fish and wildlife and their habitat within the Copper River - Rude River and Controller Bay areas of the Chugach National Forest. In general, the state finds the proposed rule to be reasonable and prudent. We do, however, have one comment regarding Section 241.22 of the regulations, in addition to the attached May 11, 1989, comments provided by the Alaska Department of Transportation and Public Facilities.

The state is concerned that implementation of Section 241.22 may be interpreted in a manner which conflicts with the Alaska Department of Fish and Game's (DFG) role in the management of fish and wildlife and their habitats. This section requires the "responsible forest officer" to determine whether activities are consistent with the primary purposes of the area: conservation of fish and wildlife and their habitat. The explanation section cross references another section of Forest Service regulations requiring special use authorizations to "minimize damage to scenic and esthetic values, fish and wildlife habitat and otherwise protect the environment." Under these directions, we believe a forest supervisor could determine that certain management or harvest methods or means authorized by the DFG are not consistent with esthetic values. We understand that either the introduction to the final regulations or the Forest Service's response to comments can effectively resolve this concern without modification to the actual regulations. We thus request that the Forest Service indicate that such determinations by the forest supervisor are intended to apply to activities other than routine fish and wildlife management, research, and harvest methods and means.

On behalf of the State of Alaska, thank you for the opportunity to review the proposed rule. If you have any questions, please do not hesitate to call this office.

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June 29, 1989

Sincerely,

Robert L. Grogan
Director

Michelle Sydemann

by: Michelle Sydemann
State CSU Coordinator

Enclosure

cc: Commissioner Lenny Gorsuch
Department of Natural Resources

Commissioner Don Collinsworth
Department of Fish and Game

Commissioner Mark Hickey
Dept. of Transportation and Public Facilities

Commissioner Dennis Kelso
Department of Environmental Conservation

Mr. John Katz
Office of the Governor

Mr. Denby Lloyd
Office of the Governor

May 11, 1989

Michael A. Barton
Regional Forester
(2600) Forest Service
Box 21628
Juneau, AK 99802-1628

Dear Mr. Barton:

We have reviewed the draft regulations you provided us concerning the management of the Copper River-Rude River addition and Copper River-Bering River portion of the Chugach National Forest. We have no comments on the draft regulations.

We have also reviewed the pre-amble to the regulations (for your reference a copy is attached) and offer the following comments:

Page 3, paragraph 6.

Most development on Native and private lands will require access. The Copper River Highway provides access from Cordova but it only provides usable access as far as Child's Glacier and the Million Dollar Bridge at Mile Post 50. The highway presently is maintained year-round only to Mile Post 14 and receives summer maintenance to the Million Dollar Bridge at Mile Post 50. The state is actively considering the possibility of reconstructing the highway to connect it to the contiguous highway system.

Page 3, paragraph 7.

The Alaska Department of Transportation and Public Facilities completed a study for an access road to Katalla for the city of Cordova, the Chugach Alaska Corporation, and private oil developers. The project has been submitted to the Alaska State Legislature for funding consideration, however, funding is not likely in the near future due to the road's estimated high cost and the limited amount of state general funding to finance capital improvement projects.

Page 3, paragraph 9.

The City of Cordova is not considering a "small fishing village". It is an incorporated city and a major center of the fishing industry on Prince William Sound and the Copper River delta. It is greatly dependent on the five species of

Michael A. Barton

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salmon from these two fishing areas. In view of the environmental damage caused by the recent Prince William Sound oil spill, Cordova may be increasingly reliant on the salmon runs of the Copper River and its tributaries until the Prince William Sound salmon runs recover from this ecological disaster.

Thank you for the opportunity to comment.

Sincerely,

Mark S. Hickey
Commissioner

cc: Craig Lindh, Division of Governmental Coordination, Office
of the Governor
W. Keith Gerken, Deputy Commissioner, Operations
John D. Horn, Acting Regional Director, Northern Region