

# STATE OF ALASKA

## ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

**SARAH PALIN, Governor**

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July 2, 2009

Richard D. Jennings, Hoonah District Ranger  
Tongass National Forest  
P.O. Box 135  
Hoonah, AK 99829-0135

Dear Mr. Jennings:

The State of Alaska reviewed the Environmental Assessment (EA) for the Access and Travel Management Plan (ATM) for the Hoonah Ranger District. The following consolidated state agency comments were compiled by the State's Alaska National Interest Lands Conservation Act (ANILCA) Implementation Program and cover issues relative to ANILCA and other state interests. Any correspondence or response pursuant to the Coastal Zone Management Act and the Alaska Coastal Management Program will be provided separately by the Division of Coastal and Ocean Management.

We appreciate the ATM/EA explains the relationship between the Forest Service Travel Management Rule and access provisions under ANILCA Section 811, and includes a comprehensive table which provides detailed information regarding the various routes, conditions and uses, including subsistence. Taken as a whole, the EA appears to provide the public with sufficient information to assist the District with this important decision regarding access to subsistence resources and other uses, as well as provide a substantive accounting of proposed closures pursuant to ANILCA, Section 811(b).

Given the overall level of coordination that occurred during this planning process with the State, we have few substantive comments. The following comments are primarily informative or technical in nature. In some instances we request inclusion of additional information or clarification in the final decision document.

### **Subsistence**

While the EA thoroughly discusses the Federal Subsistence Program, its relationship to state management is often not included. The State of Alaska is responsible for the sustainability of fish and wildlife and provides for general and subsistence hunting on all lands in Alaska – regardless of ownership – unless specifically superseded by federal law. Federal subsistence regulations only supersede state regulation when determined necessary to implement the federal subsistence priority as provided in ANILCA. For example, on page 3-3 the EA refers to the “...*Federal Subsistence Management*

*Regulations defines seasons, harvest limits, methods, and customary and traditional use determinations for the subsistence taking of wildlife on Federal public lands....”* This sentence should instead reference federal seasons, federal harvest limits, etc. Since it is important for the public to understand that the harvest of fish and wildlife on federal lands, including for subsistence, is not limited to the federal subsistence program, we request such a clarification in the final decision document.

### **Page-Specific Comments**

**Page 2-3**, Snowmobile Use. In addition to of the Alaska National Interest Lands Conservation Act (ANILCA) Section 1110(a), ANILCA Section 811 also addresses the use of snowmachines on forest service lands. We request this be clarified in the final decision document.

**Page 3-37**, third paragraph, last sentence. Although correctly referenced on page 1-6, State of Alaska concurrences for all instream activities are issued by the Alaska Department of Fish and Game.

**Page 3-55**, third paragraph, first sentence. While this statement was generally true prior to 2006, the following three years of hard winters and late spring green-ups have significantly reduced the deer population on Northeast Chichagof Island. We estimate the decline could be as much as 85% from previous population levels. This information will be available to the public in the 2009 Deer Management Report, which is currently in draft review.

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

Sincerely,



Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator