

# STATE OF ALASKA

**SARAH PALIN, Governor**

## **ANILCA IMPLEMENTATION PROGRAM**

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May 22, 2007

Cyndie Wolfe  
U.S. Fish & Wildlife Service  
Division of Conservation, Planning, and Policy  
1011 E. Tudor Rd.  
Anchorage, AK 99503-6199

Dear Ms. Wolfe:

The State of Alaska reviewed the Draft Land Protection Plan for the Innoko National Wildlife Refuge. We appreciate the opportunity to comment on this draft plan and provide the following chronological page-specific comments on behalf of the State's resource agencies.

**Photo Description**, Page 11. The salmon in the photo appears to be a coho instead of a Chinook.

**Land Status Chapter**, Page 15. We appreciate the acknowledgement of state ownership of submerged lands beneath navigable waterbodies and the status of navigability determinations in the footnote to Table 2 and in the narrative on page 20. We particularly appreciate the intent to work with the State on a case-by-case basis when navigability is not yet determined. Our only suggestion for this chapter is to add a footnote to the land status maps on pages 17 and 23, such as "This map does not address ownership of navigable waters." In addition to – or in lieu of – a footnote, the maps could be renamed "Upland Land Status."

**Wilderness Values**, Page 27, 2<sup>nd</sup> Paragraph. We suggest the following clarifications:

- Since ANILCA's inholder access provisions apply equally to wilderness and non-wilderness areas, change "Wilderness inholding" to "inholding within designated Wilderness"
- To distinguish between physical and experiential impacts, we recommend the following modification: "Access routes across Wilderness lands to private parcels may degrade Wilderness characteristics and motorized travel may disrupt the quietude of refuge visitors seeking a Wilderness experience using non-motorized access methods."

**User Group Conflicts**, Page 27. Please replace the reference to "sport hunting" with "non-local hunting." The term "sport hunting" has developed a negative connotation

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over time and is no longer used in state regulations. The term was also found in the first paragraph on page 45. We recommend doing a word search of the entire document. This comment is not applicable to general references throughout the document to “sport fishing.”

**Access**, Page 40. The first sentence states that most refuges in Alaska are open to public access per Section 1110 of ANILCA. This access provision applies to all refuges in Alaska. We therefore request that “most” be deleted.

Section 811 of ANILCA also includes access provisions for subsistence. However, this level of detail may not be necessary for this type of plan. It may suffice to instead generally indicate there are provisions in ANILCA that provide for access for public and administrative uses subject to development of reasonable regulations as provided by federal law based on a finding of resource damage.

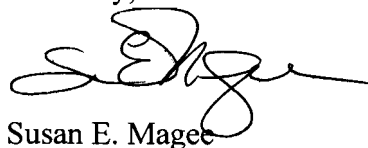
**Effects on the Economy**, Page 44. We request updated information in this section concerning the status of the commercial fishery. Salmon stocks in the Yukon River have improved and the commercial fishery has resumed. In addition, the referenced drop in the harvest of salmon is linked to the decline in demand for chum salmon from the Yukon River, particularly summer chums. The following Board of Fisheries Reports provide additional supporting information.

<http://www.sf.adfg.state.ak.us/FedAidPDFs/sp06-34.pdf>

<http://www.sf.adfg.state.ak.us/FedAidPDFs/sp06-38.pdf>

Please contact me if you have any questions.

Sincerely,



Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator