

# STATE OF ALASKA

**SARAH PALIN, Governor**

## **ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting**

550 W. 7<sup>TH</sup> AVENUE, SUITE 1430  
ANCHORAGE, ALASKA 99501  
PH: (907) 269-7529 / FAX: (907) 334-2509  
[susan.magee@alaska.gov](mailto:susan.magee@alaska.gov)

April 3, 2009

Pete Griffin, District Ranger  
Juneau and Admiralty National Monument Ranger District  
8510 Mendenhall Loop  
Juneau, AK 99801

Dear Mr. Griffin:

The State of Alaska reviewed the Juneau and Admiralty National Monument Ranger District Access and Travel Management Scoping Notice. 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.

As you know, we have been working with the Forest Service on coordinating implementation of the subsistence access provisions of ANILCA on the Tongass National Forest with implementation of the National Travel Management Rule. We encourage the District to follow the guidance in the May 23, 2008 *Interim Guide – Providing Access for Subsistence Purposes (ANILCA 811) During Access and Travel Management Planning*. We remain available to provide technical assistance as needed. In the meantime, we appreciate the effort to fully capture current use on the District road system and to provide the public an opportunity to submit detailed information in the matrix form provided in the notice.

It is our understanding the District identified resource impact concerns in the Herbert River spur road area. We look forward to discussing these issues and, if necessary, are available to assist in developing an appropriate range of alternatives to address any mutual concerns. In addition, the Alaska Department of Fish and Game (ADF&G) continues to monitor the relationship between road access and harvest of big game throughout the District. At this time, we do not have concerns in that regard; however, should that change, we will address game management issues through the appropriate state management authority (e.g., emergency closure, Alaska Board of Game Proposal) as outlined in the Master Memorandum of Understanding between the Alaska Department of Fish and Game and the Forest Service.<sup>1</sup>

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<sup>1</sup> 04MU-111001-024

We also request the Service identify all stream crossings in the project area and include the proposed management prescription, e.g., maintain, repair, or remove, for each crossing in the Environmental Assessment. It is also important to identify whether anadromous and/or resident fish are present in these streams.

The ADF&G, Division of Habitat looks forward to working with the District to reach concurrence prior to conducting any activities in fish bearing waters. As outlined in the Master Memorandum of Understanding<sup>2</sup> (MOU) between the Division of Habitat and the Forest Service, state habitat biologists will coordinate with District staff to confirm best management practices are applied at each crossing, including, conducting instream activities to avoid sensitive fish life stages, immediately stabilizing disturbed stream banks to prevent erosion and sedimentation, and using materials treated with preservatives that do not contain creosote or pentachlorophenol for structures that cross fresh water.

The MOU also calls for cooperation in updating the *Catalog of Waters Important for the Spawning, Rearing, or Migration of Anadromous Fishes* by providing nominations to the *Catalog*. We encourage District field staff to submit nominations for the annual *Catalog* updates. For additional information on this process or to coordinate fieldwork associated with specific crossings, please contact Jackie Timothy, Regional Supervisor at (907) 465-4275 or [jackie.timothy@alaska.gov](mailto:jackie.timothy@alaska.gov).

Thank you for this opportunity to comment. We look forward to reviewing the upcoming Access and Travel Management Plan and associated Environmental Assessment. If you have any additional questions, please contact me at 269-7529.

Sincerely,



Susan E. Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator

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<sup>2</sup> 04MOU-111011-094