

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SARAH PALIN, Governor

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

April 6, 2009

Richard Voss, Refuge Manager
Arctic National Wildlife Refuge
101 12th Avenue, Room 236
Fairbanks, AK 99701-6237

Dear Mr. Voss:

The State of Alaska reviewed the Compatibility Determination (CD) for the proposed core sampling and transport of equipment on Alaska Native Claims Settlement Act (ANCSA) 22 (g) lands located within the Arctic National Wildlife Refuge. 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 the 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 Alaska Department of Natural Resources, Division of Coastal and Ocean Management.

We agree the proposed activities would not impact adjacent refuge lands nor materially interfere or detract from the fulfillment of the purposes of the National Wildlife Refuge System mission or the purposes of the Refuge. As such, we recommend the Refuge issue a positive compatibility finding for the proposed activities.

Of separate issue, under "Refuge Purposes," the CD indicates the purposes of the Wilderness Act of 1964 also applies to refuge non-designated wilderness lands "...in any way that a proposed use might affect the area's suitability for designation as wilderness." While we understand the intent of this statement relates to protecting wilderness *values* on non-designated wilderness lands, we caution against using this intent to create de facto buffer zones, to indirectly extend wilderness purposes beyond designated wilderness areas, or to manage non-wilderness under a wilderness mandate.

Thank you for this opportunity to comment. Please contact me if you have any questions.

Sincerely,



Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator