STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SEAN PARNELL, Governor

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March 15, 2010

Christopher Savage, District Ranger Petersburg Ranger District Tongass National Forest P.O. Box 1328 Petersburg, AK 99833-1328

Dear Mr. Savage:

The State of Alaska reviewed the Petersburg Outfitter and Guide Management Plan and Environmental Assessment (EA). 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 plan recommends increased commercial recreational opportunities for most areas of the District and support the intent to provide stable business opportunities for the outfitter and guide industry. It appears this intent will best be served by the greater allocation proposed in the preferred alternative. We also appreciate the plan includes the Wilderness Needs Assessments for Duncan Salt Chuck, Tebenkof Bay and Kuiu Wilderness Areas, making them available for public review and comment.

The Alaska Department of Fish and Game (ADF&G) is responsible for the sustainability of fish and wildlife on all lands in Alaska and utilizes emergency orders to protect that sustainability when necessary. Additionally, the Alaska Board of Game is capable of modifying seasons and bag limits. When considering conflicts that pertain to fish and wildlife, we request the District coordinate with ADF&G. We appreciate the communication that has occurred between local ADF&G and District staff and trust it will continue throughout the implementation of this plan.

ANILCA Section 1110(a) permits the use of certain modes of access for traditional activities in designated wilderness, including motorboats and airplanes, subject to reasonable regulation. Access cannot be restricted unless it is determined that such use would be detrimental to the resource values of the unit or area. We realize that management of guided use as a commercial activity is different from managing public access. However, for all practical purposes, without commercial operators, most public access to this area for hunting and fishing would be eliminated for visitors that do not own their own airplanes or motorboats (i.e. non-local Alaska

residents and non-residents). We therefore encourage the District to consider the fundamental intent of Section 1110(a) when making decisions that affect public access.

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

Sally Gibert, ANILCA Program Coordinator Marina Whitacre, Team Leader, Petersburg District