



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**ANILCA Implementation Program**  
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

550 W. 7<sup>th</sup> Avenue, Suite 1430  
Anchorage, AK 99501  
Main: 907.269.7529  
Fax: 907.269.5673

December 1, 2016

Debora Cooper, Associate Regional Director, Resources  
National Park Service, Alaska Region  
240 West 5<sup>th</sup> Avenue, Room 114  
Anchorage, AK 99501

Dear Ms. Cooper:

Thank you for your letter of November 9, 2016, regarding the State of Alaska's April 12, 2016 comments on the proposed subsistence collections rulemaking. I am encouraged to hear that the Service is considering modifications based on the State's and other comments received during the proposed rule's public comment period. I appreciate the Service's efforts to discuss this and other issues with the Alaska Department of Fish and Game (ADF&G) at the various meetings noted in your letter. However, my understanding is that the majority of these meetings touched broadly on a number of topics, including this rulemaking. While certainly an important forum for dialogue and productive overall, the meetings were of limited duration and did not provide an opportunity for substantive discussions on the various technical issues raised in the State's comments.

For clarification, comments submitted on behalf of the State are typically not limited to the interests of one department and most issues relative to the Alaska National Interest Lands Conservation Act (ANILCA) transcend the mandates and responsibilities of individual state agencies. As the State's ANILCA Program Coordinator, my role is to facilitate state agency reviews of federal plans, policies and regulations that affect management of conservation system units and other areas designated by ANILCA, and to consolidate state agency comments so that federal agencies receive one response from the State on actions that affect various state interests. I also serve as a central point of contact for the State and can assist in identifying agencies that are likely to have an interest in particular issues for advance consultation. I can also identify the agencies that participated in a review that would have an interest in follow-up discussions.

With regard to this rulemaking, the Alaska Department of Natural Resources (DNR) also contributed to the State's comments and DNR staff are equally interested in resolving the issues identified. Therefore, on behalf ADF&G and DNR, I request an opportunity to meet with you to discuss the proposed rulemaking further, including obtaining additional information on the modifications that you reference in your letter. ADF&G and DNR staff are also both interested in participating in upcoming discussions intended to better define consultation and cooperation as it applies to state management activities, park management planning, and other federal actions that impact state interests, including the implementation of ANILCA.

I fully agree that we can often find common ground when we share information and different perspectives on issues, and would like to point out that mutually agreeable successes often result from working cooperatively early on to identify issues and discuss potential solutions. Please do not hesitate to contact me, however early in a process, on areas of mutual interest or responsibility that could benefit from our cooperative efforts.

I look forward to hearing from you to schedule meetings with agency staff for further discussions on the subsistence collections rulemaking and consultation.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with a large initial "S" and a long, sweeping tail.

Susan Magee  
ANILCA Program Coordinator

cc: Sam Cotten, Commissioner, Alaska Department of Fish and Game  
Andrew Mack, Commissioner, Alaska Department of Natural Resources  
Bert Frost, Alaska Regional Director, National Park Service