

# STATE OF ALASKA

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

**SEAN PARNELL, Governor**

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January 28, 2011

Service Information Collection Clearance Officer  
U.S. Fish and Wildlife Service  
MS 222-ARLSQ, 4401 North Fairfax Drive  
Arlington, VA 22203

Dear Mr. Kilcullen:

The State of Alaska reviewed the November 29, 2010 Federal Register Notice regarding Proposed Information Collection; OMB Control Number 1018-0102; Applications for Special Use Permits on National Wildlife Refuges. The following represent the consolidated views of the State's resource agencies.

We understand the U.S. Fish and Wildlife Service (Service) may require sufficiently detailed information to ensure requested activities are consistent with the National Wildlife Refuge System Administration Act, and that specifically tailored permit applications can theoretically reduce the burden on the applicant and expedite the permitting process. However, the extensive list of information associated with Form 3-YYYY – Research Special Use Application and Permit is significantly greater than the requirements represented in Form 3-1383. Conversely, there are no information requirements listed for Form 3-XXXX - Commercial Special Use Application and Permit, making it unclear as to why the Service determined a separate form is even necessary. Considering the importance of research, and the significant role that commercial guiding, visitor services and cabins serve in the public's ability to access and experience Alaska's remote refuges, we are interested in ensuring that information requests are appropriate and do not create an undue burden to applicants. We, therefore, request that the Service disclose information requirements for both new forms, along with supporting rationale and an explanation as to why the current form will not suffice. We also request the draft forms and accompanying instructions be made available for public review.

Regarding research conducted by the state fish and wildlife agencies, including the Alaska Department of Fish and Game (Department), we request the Service acknowledge that state fish and wildlife research and other administrative actions are exempt from this IC process. The States, including Alaska under ANILCA 1314 and 43 CFR Part 24, need not apply for special use permits from the Service when conducting routine activities covered under a valid cooperative agreement. The Service and the Department have a

Master Memorandum of Understanding (MMOU) in place that states the Fish and Wildlife Service agrees:

*To recognize the right of the Department to enter onto Service lands at any time to conduct routine management activities which do not involve construction, disturbance to the land, or alterations of ecosystems.*

In designated Wilderness Areas, a minimum requirement analysis may be necessary for activities generally prohibited under the Wilderness Act; however, this process is distinct from a special use permit.

Thank you for the opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Magee', written in a cursive style.

Susan Magee  
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator