

**Audubon Alaska • Alaska Center for the Environment • Alaska Community Action On Toxics • Alaska Fisheries Incorporated • Alaska Quiet Rights Coalition
Alaska Wild Animal Recovery • Alaskans For Palmer Hay Flats State Game Refuge • Alaska Wildlife Alliance • Anchorage Audubon Society
Cascadia Wildlands • Coal Point Seafoods • Center for Biological Diversity
Cook Inletkeeper • Copper River Watershed • Friends of Alaska National Wildlife Refuges • Friends of Glacier Bay • Friends of the Anchorage Coastal Wildlife Refuge • Friends of McNeil River • Kachemak Bay Conservation Society
Kenai Area Fisherman's Coalition • Knik Canoers and Kayakers • Pioneer Alaskan Fisheries • Northern Alaska Environmental Center • Seaducks Unlimited
Southeast Alaska Conservation Council**

VIA EMAIL ONLY

sean.parnell@alaska.gov

October 27, 2014

Governor Sean Parnell
State of Alaska
PO Box 110001
Juneau, AK 99811

Dear Governor Parnell:

Our organizations represent over 25,000 Alaskans and visitors who are deeply concerned about the responsible management of our state's magnificent fish and game habitat. We're writing to ask you to take action to restore meaningful public involvement and ensure a proper balance in our natural resource decision making process.

Alaska's local economies rely in large part on our incredible natural resources. Tourism, hunting, fishing, hiking, camping and wildlife viewing drive hundreds of millions of dollars into Alaskan communities each year, and our local families and businesses rely heavily on clean water and healthy habitat.

Under your direction, the Alaska Department of Fish & Game (ADF&G) is rewriting the rules governing Alaska's Special Areas, which include 32 legislatively-designated Critical Habitat Areas, State Game Refuges and State Wildlife Sanctuaries.

In the past, the State has worked collaboratively with local citizens and groups to create or revise the management plans for our Special Areas. Now, however, your Administration is revising Special Areas rules behind closed doors, with no public input.

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What we do know about the proposed rules revisions create serious concerns because they threaten to limit public involvement in the development of the management plans which guide our Special Areas, and to open our Special Areas to a broad array of commercial, industrial, recreational or other activities without public notice or comment.¹

That's why over 950 Alaskans and visitors have taken the time recently to write to you, Commissioner Campbell, and Commissioner Balash about their concerns over these Special Areas rollbacks.

We recognize the need for balance in managing Alaska's prized lands and waters. That's why we're asking you to:

- 1) Direct ADF&G to engage local and other pertinent stakeholder groups and hold public meetings in local communities – before formal notice and comment on the proposed rules under the Alaska Administrative Procedures Act – so local Alaskans have a meaningful seat at the table when developing the management plans and rules governing our Special Areas. These stakeholder group meetings should occur, at a minimum, in Fairbanks, Palmer, Anchorage, Soldotna, Homer, Cordova, Dillingham and Juneau, and should reflect the start to a process that will result in local information and local knowledge shaping local management plans and Special Areas rule changes;
- 2) Ensure our Special Areas continue to have management plans that provide clear goals and objectives; the guidance necessary to meet those goals and objectives (including local knowledge about specific area attributes and species); and that Alaskans have a clear voice in defining what activities should and should not occur in our Special Areas through a transparent and accountable public process; and
- 3) Protect our democratic process by ensuring Alaskans receive public notice and adequate opportunity to meaningfully comment on any permits that would authorize commercial, industrial, recreational, or other activities in our Special Areas.

All too often, regulatory and legislative changes are getting rushed through, with little opportunity for meaningful public engagement. With the demise of the Alaska Coastal Management Program, Alaskans have lost an important opportunity to weigh-in on important projects affecting our coastal resources. Furthermore, in the wake of House Bill 77, it's all the

¹ ADF&G does not provide public notice on "Special Areas Permits" for activities in our critical habitats, refuges and sanctuaries, so once the teeth are pulled from the management plans, Alaskans will be in the dark about projects and activities that impact our special habitat areas.

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more important to recognize and act on the rightful role of Alaskans to engage in decisions affecting our publicly-owned fish and game resources.

Alaska's incredible resources can support sustainable communities and businesses for decades to come if we manage them properly and include Alaskans in the process. We hope you agree our Special Areas – and the Alaskans who rely on them - deserve the basic safeguards outlined above.

Thank you and we look forward to your timely response. You may respond to P.O. Box 220196, Anchorage, AK 99522-0196 or bc@farak.org.

Sincerely,

Barbara Švarný Carlson

Barbara Švarný Carlson
Friends of the Anchorage
Coastal Wildlife Refuge (FAR)

On behalf of the following people and groups:

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