



THE STATE
of ALASKA
GOVERNOR SEAN PARNELL

Department of Natural Resources

CITIZENS' ADVISORY COMMISSION ON
FEDERAL AREAS
Stan Leaphart, Executive Director

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Fairbanks, Alaska 99709
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March 29, 2013

Melanie Steinkamp
U.S. Fish and Wildlife Service
3331 MIB
1849 C Street, N.W.
Washington, D.C. 20240

Dear Ms. Steinkamp:

The Citizens' Advisory Commission on Federal Areas reviewed the *Draft Guidance on Selecting Species for Design of Landscape-scale Conservation*. Based on our review, the Commission does not support adoption of the Surrogate Species program within the State of Alaska. We are unconvinced that such a program would provide any substantive benefits for the management of fish and wildlife resources in this state.

There are 16 units of the National Wildlife Refuge System in Alaska, ranging in size from 700,000 acres to more than 19 million acres and encompassing 76.8 million acres. The lands and habits found in these refuges are representative of all ecosystems found in Alaska. Habitat in all of these refuges is intact and resident fish and wildlife populations are healthy and well managed by the State of Alaska. Application of a USFWS surrogate species program to state managed species or to non-USFWS managed lands will interfere with the ability of the State to manage its fish and wildlife resources.

The USFWS has primary management responsibility over migratory waterfowl, endangered species and certain marine mammals found in Alaska. We suggest that if the USFWS is compelled to adopt a surrogate species program, that it select species over which it has clearly delineated statutory and regulatory management authority. Species which are the responsibility of the State of Alaska should not be selected, nor should non-USFWS managed lands be included..

Sincerely,

A handwritten signature in black ink that reads "Stan Leaphart".

Stan Leaphart
Executive Director