

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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STEVE COWPER, GOVERNOR

STATE CSU COORDINATOR  
2600 DENALI STREET, SUITE 700  
ANCHORAGE, ALASKA 99503-2798  
PHONE: (907) 274-3528

February 1, 1990

Mr. Glenn Elison  
Refuge Manager  
Arctic National Wildlife Refuge  
101 12th Avenue, Box 20  
Fairbanks, AK 99701-6267

Dear Mr. Elison:

On behalf of State agencies, thank you for the opportunity to review the first workbook of the upcoming Arctic National Wildlife Refuge River Management Plan. This letter represents the consolidated comments of the State's resource agencies.

As you know, the U.S. Fish and Wildlife Service (FWS) and State agencies have been grappling with the issues raised by this plan in many areas of the State. On one hand, the FWS has a mandate to manage the recreational uses of the refuge. On the other hand, much of the actual use occurs on the State-owned shorelands of navigable waterbodies. Thus the ability to address the issues raised in the workbook involves a complex set of relationships between the FWS, the Alaska Department of Natural Resource (DNR), the Alaska Department of Fish and Game (DFG) and the State Boards of Fisheries and Game.

As a result of a similar planning effort for the Togiak Refuge, State agencies are currently developing a policy for managing State lands and waters within the refuge. These policies are being developed in conjunction with the Togiak Public Use Management Plan. They will serve as the State's starting point for discussions on the Arctic Refuge River Management Plan. We encourage you to work closely with your Anchorage regional office for details on the progress of this effort.

The following general comments should be viewed as additions to the ongoing work that is being done in conjunction with the Togiak Public Use Management Plan.

### General Comments

1. The State appreciates FWS' efforts to identify public concerns at an early stage in the planning process. Achieving high quality public input is a challenging task. Care must be taken to eliminate biases in conducting and evaluating

public opinion surveys associated with planning workbooks and workshops. Questions that solicit public comments on planning issues should be framed to avoid pre-determined conclusions. Reporting of public opinion results should also avoid simple numerical tabulation of individual responses which may represent the opinions of a varying number of people. Finally, FWS should design the public opinion survey so that results are representative of persons from all user groups.

2. Due to insufficient background information for several of the issues, it is difficult to make meaningful comments on the workbook. Additional information on current and projected public use, environmental impacts and definition of terms (e.g. "wilderness quality," "crowded" encounters) should be provided in future planning documents. Where this information is lacking, the plan should address the means for acquiring this information.
3. We appreciate that the workbook provides a brief explanation of the relationship between this plan and the existing comprehensive conservation plan for the refuge. In later documents, explanation should also be provided regarding the relationship of this plan to other scheduled refuge plans, including the fishery management and public use management plans.
4. In June 1989, the State provided comments on generic issues affecting public use management on most national wildlife refuges in Alaska. If you have not already done so, we suggest this document be re-examined to assess its applicability to this plan.
5. It is recommended that subsequent planning documents describe the roles of DFG and FWS in the management of fish and wildlife on the Arctic Refuge according to the Master Memorandum of Understanding signed by both agencies. Reference should also be made that the allocation of fish and wildlife among various user groups is the responsibility of the Alaska Boards of Fisheries and Game.
6. FWS is encouraged to provide adequate notice to the public and the State regarding public meetings and other associated planning events. Timely notice will allow both the State and the public to maximize their participation in the refuge planning process. Workbook 1, which announced the first round of public meetings, was sent to the State after some of the public meetings had already taken place. Also, notice of the December 12, 1989, public meeting in Anchorage appeared in local newspapers just one day in advance of the

meeting. We understand that efforts will be taken to avoid similar problems in the future.

### Specific Workbook Comments

#### 1. Maintenance of Wilderness Values

More information is required before informed comments can be made on this issue. The FWS needs to objectively identify and evaluate the "wilderness values" referenced in this issue. These "values" should comply with the provisions of ANILCA. Planning documents should also make distinctions between "wilderness" as a term describing a value and designated "Wilderness". To avoid confusion, perhaps "primitive values" could be substituted for the former usage.

#### 2. Physical Impacts to the Environment

As indicated in our general comments, additional background information regarding this issue is needed to adequately address this issue, including a description of current and projected public use and physical impacts to the environment.

#### 3. Increasing Number of Users and Encounters Between Users

Additional background information on public use and a discussion of standards for defining terms like "crowding" and "solitude" used to describe the intensity of public encounters should be provided. Current and projected public use for each user group should be reported or estimated on a temporal and spatial basis. If this information is not available, the plan should explain how public use data can be obtained and monitored in the future.

#### 4. Commercial Use

The aforementioned comments regarding the need for additional information on current and projected public use for each user group (commercial, private, or non-commercial) are also applicable to this issue. Attention should also be given to the impacts of long-term or recurrent camp site use, such as sanitation and litter. Fuel storage near river systems, coastal estuaries or inland lakes should also be addressed.

#### 5. Hunting, Non-hunting and Subsistence Users

Refuge staff have previously indicated during informal meetings with DFG representatives that the plan will not address the management of hunting activities. Insertion of this issue in the workbook implies that hunting related

issues may be addressed in the plan. Use of the refuge by hunters, which primarily occurs during late summer-early fall and in upland areas, has remained relatively constant in most areas. It is questionable whether hunting activities are contributing significantly to the public use concerns (crowding and site damage in river floodplains) mentioned in the workbook. Clarification is needed regarding whether and to what extent management of hunting activities will be addressed in the plan.

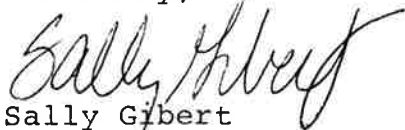
FWS should be aware that the State is establishing new laws and regulations for managing big game guides and outfitters which will be assigned to designated geographic use areas throughout the State, including the Arctic Refuge.

6. Means of Access

Access to and within the refuge has traditionally required the use of some sort of motorized transportation including aircraft, motorboats and snowmachines. Traditional activities are authorized under Section 1110 of ANILCA unless such activities are determined to be detrimental to resource values. FWS is urged to tailor any recommended access regulations to actual management needs using site- and season-specific methods to minimize affects on traditional activities. Whenever possible, FWS is encouraged to precede any access restrictions with studies that document traditional use patterns.

Thank you for your consideration of these comments. If you have any questions, please feel free to contact this office.

Sincerely,

  
Sally Gibert  
State CSU Coordinator

cc: George Constantino, FWS  
Lennie Gorsuch, DNR  
Don Collinsworth, DFG  
Dennis Kelso, DEC  
Robert Grogan, DGC