

STATE OF ALASKA

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DIVISION OF GOVERNMENTAL COORDINATION

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March 2, 1989

National Wildlife Refuge EIS Team
Division of Refuges
U.S. Fish and Wildlife Service
2343 Main Interior Building
18th and C Streets, NW
Washington, DC 20240

To Whom It May Concern:

The State of Alaska has reviewed the Draft Programmatic Environmental Impact Statement (EIS) for the Management of National Wildlife Refuges and offers the following two comments for your consideration.

- 1) Although neither Alternative "C" nor "D" is designated as the preferred alternative, the State of Alaska wishes to express its opposition to both of these alternatives. Alternative "C" would eliminate the optional use of resource management practices (e.g., prescribed burning and mechanical habitat manipulation), prohibit all consumptive uses (e.g., hunting, fishing, trapping, and berry picking), and severely restrict economic uses (e.g., commercial fishing, timber harvesting, and trapping). Alternative "D" would prohibit the taking, capture, or killing of any animal for recreational purposes, population control, or habitat protection. As noted on page 45-49 of the EIS, several of these provisions could not be implemented in Alaska because they would violate requirements of the Alaska National Interest Lands Conservation Act (ANILCA). Other provisions could be implemented (e.g., restrictions on resource management practices), but are not needed to protect refuge resources, would conflict with state policy, and/or would negatively affect the economic and social well-being of many Alaskans.
- 2) As noted on page 8 of the EIS, the U.S. Fish and Wildlife Service recently completed comprehensive conservation plans for the 16 national wildlife refuges located in Alaska. These plans were developed through a lengthy process that

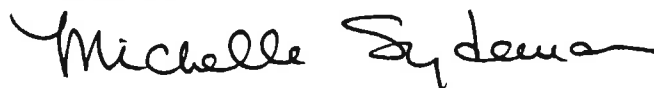
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included extensive public participation. While the state does not endorse all of the decisions made in these plans, we believe national wildlife refuges in Alaska should be managed in accordance with the plans. We therefore would oppose any attempt to substantially deviate from the management directions outlined in the plans without completing the extensive public involvement process required for major plan revisions.

The State of Alaska appreciates the opportunity to comment on this draft programmatic EIS. If we can be of assistance in clarifying any of these comments, please do not hesitate to call.

Sincerely,

Robert L. Grogan
Director



By: Michelle Sydeman
State CSU Coordinator

cc: Commissioner Collinsworth, DFG
Commissioner Kelso, DEC
Commissioner Gorsuch, DNR
Commissioner Hickey, DOTPF
John Katz, Office of the Governor
Denby Lloyd, Office of the Governor
Walter Stieglitz, FWS

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