

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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August 21, 1989

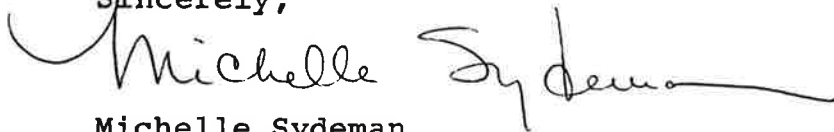
Mr. Steve Breerer
Refuge Manager
Tetlin National Wildlife Refuge
Box 155
Tok, AK 99780

Dear Mr. Breerer:

The State of Alaska offers the enclosed comments in response to the Tetlin National Wildlife Refuge Public Use Management Plan worksheet. Several of these comments are similar to issues raised by the State in a June 15, 1989, letter to you and other refuge managers. Due to the early stage of the planning process, the State's comments are general in nature and have been organized using the same topic headings as the worksheet.

On behalf of the State of Alaska, thank you for the opportunity to provide these comments. Please feel free to call this office to discuss these comments or other related issues. The State looks forward to working with the Fish and Wildlife Service on the development of a public use management plan for the Tetlin Refuge.

Sincerely,



Michelle Sydeman
State CSU Coordinator

cc: Mr. Walter Stieglitz
Fish and Wildlife Service

Dr. Gail Baker
Fish and Wildlife Service

Mr. Norman Olson
Fish and Wildlife Service

Commissioner Don Collinsworth
Department of Fish and Game

Commissioner Lennie Gorsuch
Department of Natural Resources

Commissioner Mark Hickey
Department of Natural Resources

Commissioner Dennis Kelso
Department of Environmental Conservation

Mr. Denby Lloyd
Office of the Governor

Distribution List

ENCLOSURE

Access

1. The State encourages the FWS to document traditional use patterns prior to considering any restrictions on access. Existing access routes and modes of transportation, including airboats, should be permitted unless they pose a significant threat to refuge resources or uses. Restrictions should be tailored to actual management needs using site- and season-specific methods.
2. The State encourages the FWS to provide for continued use and maintenance of existing airstrips.
3. The plan should acknowledge the State's jurisdiction over shorelands (lands under navigable waters) and watercolumns.

Interpretation and Recreation

1. The State encourages the FWS to consider developing facilities (pullouts, campgrounds, nature trails, visitor centers, etc.) along the Alaska Highway to meet the needs of highway travelers. Facility development should be done in consultation and cooperation with the State and interested local residents.
2. The State recommends that interpretative programs include information on allowable refuge uses, including the importance of subsistence and other established uses of fish and wildlife resources by local residents.

Consumptive Recreation

1. The State would like to work with the FWS to conduct baseline studies to expand information on the distribution, migration, abundance, life history, and uses of the major refuge fish and wildlife species. Studies of highly migratory species should include areas outside of refuge boundaries.
2. The State recommends that existing uses of fish and wildlife resources be allowed to continue unless they pose a significant threat to these resources. FWS proposals to restrict these uses should be as site- and season-specific as possible to minimize disruption of traditional uses.

3. The FWS should continue to allow the existing fish stocking program on the refuge. Expansion of this program should be closely coordinated with the Alaska Department of Fish and Game (DFG) and only be considered after the necessary baseline studies are conducted. Fish stocking and restoration activities should also consider the impact on established uses and the potential for increased trespass on private inholdings.
4. The State recommends that existing and potential disputes involving the use of cabins, especially those on traplines, be addressed in this plan.

Subsistence

1. In order to provide the opportunity for continued subsistence uses by local residents, it is important that harvest levels and patterns be documented for all user groups. For highly migratory fish and wildlife species, this should include harvest surveys in areas outside of refuge boundaries and should be done in cooperation with the DFG and other agencies.
2. The current harvest data base should be examined to determine if proposed public uses conflict with existing subsistence activities in the refuge. If the existing data are inadequate for this purpose, then the FWS should work closely with local residents and the DFG to determine how the required data can be obtained.
3. The State encourages the FWS to consider the impacts of all development proposals (e.g., for new facilities along the Alaska Highway) on local use of the refuge. Even an expansion of non-consumptive uses (hiking, camping, etc.) may impact local consumptive uses.

Other Issues

1. Since the draft fisheries management plan (FMP) for this refuge indicates the existence of several valid mining claims, it is important that the plan include guidelines for mineral extraction that address protection of fish and wildlife habitats.
2. The plan should acknowledge refuge fire management plans and the function of the Alaska Interagency Fire Management Council. In addition, the fire management policy should be flexible. The reference in the Comprehensive Conservation Plan to allowing 75,000 acres of prescribed burns and

wildfires over a ten-year period conservation plan should be regarded as an index, not an absolute maximum figure.

3. The State requests that the plan acknowledge State of Alaska regulatory authority over the taking of fish and wildlife resources on the refuge. The plan should also clarify that the FWS will work with the Alaska Boards of Fisheries and Game on any fish and wildlife harvest allocation issues that may arise.
4. The State recommends that the plan clearly indicate its relationship to other step-down plans being considered or developed for the refuge. For example, the May 1989 worksheet omits specific reference to the draft FMP.
5. References in the plan to ANILCA purposes should avoid any implication that the purposes set out for this refuge in Section 302(8) are the only purposes applicable. For example, the refuge also provides for trapping and recreational hunting and fishing.
6. The State recommends that refuge environmental education programs be expanded to all communities in and adjacent to the refuge.

DISTRIBUTION LIST

July 6, 1989

- [1372] Mr. Al Carson, Department of Fish and Game Habitat Division, Anchorage
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