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August 27, 1991

Gary G. Marsh
Recreation and Cultural Resources
Bureau of Land Management
1849 "C" Street NW, Room 3360
Washington, DC 20240

Dear Mr. Marsh:

The State of Alaska has reviewed the Bureau of Land Management's (BLM) Draft Manual Section concerning Wild and Scenic Rivers -- Policy and Program Direction for Identification, Evaluation and Management. This letter contains the consolidated comments of the State's resource agencies.

On July 26, 1991 the State notified you by letter that our comments would be late since we did not receive copies of the document until mid-July. We trust these comments will still be useful to you.

Section 8351.06(F) of the proposed manual states BLM will not identify any wild and scenic rivers in Alaska. The State supports this policy. The policy is consistent with the State's understanding of previous agreements, statutes, and court orders.

For example, Section 101(d) of the Alaska National Interest Lands Conservation Act (ANILCA) states Congress's intent that ANILCA provides "a proper balance between the reservation of national conservation system units and those public lands necessary and appropriate for more intensive use and disposition" and the need for new CSU designations is therefore unnecessary.

In addition, Section 1326(b) of ANILCA specifically states that no further studies to consider establishment of new CSU's shall be conducted without congressional authorization.

Gary G. Marsh

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Finally, the State believes that the BLM has sufficient administrative tools to manage river-oriented recreation and resources on federal lands without a Wild and Scenic River designation.

Thank you for the opportunity to provide these comments. If you have any questions, please feel free to contact this office.

Sincerely,



Paul C. Rusanowski, Ph.D.,
Director

cc: Commissioner Harold Heinze, Dept. of Natural Resources
Commissioner Carl Rosier, Dept. of Fish and Game
Commissioner John Sandor, Dept. of Environmental
Conservation