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August 5, 1993

Gary Vequist
National Park Service
2525 Gambell Street, Room 107
Anchorage, Alaska 99503-2892

Dear Mr. *Gary* Vequist:

The State of Alaska has completed its review of the Resource Management Plan for Bering Land Bridge National Preserve. We appreciate the opportunity to review of this internal draft. This letter represents the consolidated comments of the State's resource agencies.

Overall, the plan is of poorer quality, contains erroneous statements, and lacks adequate specifics compared to others reviewed to date. **We therefore request this resource management plan be substantially updated and rewritten prior to release to the public.** To facilitate the rewrite, the authors should conduct a careful review of parallel sections of the Yukon-Charley Rivers resource management plan which was developed in consultation with State agencies and which satisfactorily addresses a number of the issues discussed in this plan. It should also include current consultation with the Department of Fish and Game's (DFG) fisheries, wildlife, and subsistence staff. A review of more current data is also a necessity. These problems and recommendations are discussed in more detail below.

Priorities

The document does a poor job of identifying priorities among work program components. Specifically:

- * It is difficult to determine what types of resource study and management activities are allowable (or disallowed).
- * Work program options within projects are not prioritized.
- * It is unclear how projects fit into the priorities when they are dependent upon future funding and/or the interests of other organizations.
- * The basis for establishing the existing priorities is not apparent, and appears arbitrary.

We specifically request that the collection of baseline fisheries information and establishment of a cooperative monitoring program be elevated in priority in the natural resources portion of the plan. In those portions of the plan addressing fisheries, a more specific list of phases is necessary for completion of projects which may be pursued dependent upon funding levels.

The plan adequately recognizes the importance of ethnographic and subsistence use data in managing the preserve and implementing the subsistence priority. At the same time, the plan accurately notes the paucity of such information for the preserve area and is committed to seeing that the required work is done. Hopefully, the two subsistence projects will rank high among the numerous natural and cultural resources projects being proposed.

Data Not Current

The natural resources section of the plan is severely out-of-date. This should be corrected by conducting a review of current publications and through consultation with fisheries, wildlife, and subsistence specialists of DFG. The only significant consultation occurred on June 15, 1990, when the Service conducted a scoping meeting with agency representatives. A subsequent review of project statements in August 1990 revealed that numerous projects agreed for inclusion at the scoping meeting were omitted. One additional contact by the Service was made in August 1990 with local DFG staff to outline some of those projects. The present draft contains the bare-bones of those projects, but no further consultation has occurred. Consequently, the plan is missing

specific project designs, current data sources, and details for suggested activities discussed at the 1990 meeting and in the review.

Past Agreements Not Utilized

Even more significantly, the authors have apparently chosen not to include understandings and cooperative approaches to resource efforts which were extensively resolved in preparation of the Yukon-Charley Rivers resource management plan, despite State efforts to point out the benefits of this approach. It is exceedingly frustrating for State staff to re-address issues which have been satisfactorily resolved during earlier efforts. Since the Service is currently preparing numerous such plans, we suggest that each such planning effort include review of earlier plans to reduce plowing old ground.

Access Plans and Traditional Access Baseline Data

We are extremely disturbed that the priority project list on page 14 fails to recognize the high priority need for information on traditional access in the preserve, even though such a plan is proposed on pages 94-95. The Seward Peninsula was traditionally (pre-ANILCA) accessed by many methods of transportation for mining, subsistence, reindeer herding, and general use. Contrary to the statements here, roads at one time did access various areas within the recently-created preserve.

ANILCA Section 1301(b)(4) requires preparation of an access plan within five years of passage of the Act. Although this deadline has long since passed, the Service did commit to development of such a plan in the 1986 general management plan (7 years ago). Furthermore, with the State's heightened interest in RS 2477 rights-of-way, an access and transportation plan would be particularly timely.

Continued use and management of the preserve's resources is highly dependent upon the continuation of traditional access. ANILCA Sections 1110 and 811 guarantee such access will continue. We do not believe it is possible to separate baseline information on resource data without also collecting information on access. We therefore request that the collection and analysis of such information be included **in each related project**, as well as included as a high priority project of its own.

We disagree that the 1964 Executive Order 11644 is the prevailing authority on provisions for allowing ORVs (ATVs) in the preserve. When Congress passed ANILCA in 1980, it specifically recognized traditional methods of access. Subsequent regulations implementing these provisions were adopted for the federal units (43 CFR Part 36); these provide for the continuation of traditional (pre-ANILCA) routes and areas by ORVs. The Service has failed to recognize and conduct studies of the pre-ANILCA access, hence failed to conduct the administrative process necessary to "designate" the routes and areas. In effect, the Service has closed traditional access by failing to designate routes and areas. We request that actions be taken as soon as possible to rectify this situation, including making appropriate changes in the plan.

This proposed project also fails to adequately recognize the existing transportation corridors included in Section 201 of ANILCA in the establishment of the unit. We suggest the Service initiate cooperative evaluation of these corridors with the State as soon as possible and that appropriate funding be described and prioritized in the resource management plan.

Beringia

Throughout the document references are made to the proposed Beringian park as though it already were established. This is not the case. S2088, introduced in 1991, would have authorized designation of the preserve as an international park through presidential proclamation. This bill did not pass, however, in part because of local opposition as well as the inability of the Russian Republic to enact their portion of the international park. Further, ANILCA specifically precludes further administrative land withdrawals or creation of additional conservation system units without action by Congress. We suggest that the Service carefully edit references to Beringia to correct misrepresentations and to give deference to the opposition to the proposed land designation by many local residents. Alaska's congressional delegation has indicated its intent to ensure that local concerns are fully addressed in any enabling legislation for the international park.

We further believe it is inappropriate to prioritize efforts and funding for a project (page 119) entirely dependent upon a possible future Congressional action when there are so many

more pressing baseline information needs. We are also concerned about the proposal on page 125 to prepare an administrative history of the, as yet, non-existent international park. Given other demands on limited funds, it makes little sense to expend funds (\$90,000 for a history and \$50,000 for a conference) on something that has not yet been created.

Project Statements

The extent of problems in the natural resources section as described above resulted in receipt of extensive comments. Rather than providing repetitive page-specific corrections for the entire document, examples of the problems contained throughout the document are discussed below for 5 of the 29 proposed natural resource projects. Based on a review of these projects, the remaining project statements should be similarly revised.

SAMPLE PROBLEMS FROM FIVE NATURAL RESOURCE PROJECTS

Page 39. **ASSESS BROWN BEAR POPULATION**

There are numerous, major errors in the "Problem Statement" discussion. Given the cooperative interagency effort on bear projects which has been invested to date, we are concerned about the Service's misrepresentations of what has occurred and what is known about the bear population. The following are examples of some of the inaccurate statements:

- * *"Each year, residents of the Seward Peninsula make several proposals to the Alaska Game Board for liberalizing the brown bear harvest on the Peninsula."*

Not so, in part because the Alaska Board of Game schedules consideration of bear proposals only every other year.

- * *"These [bear hunting] proposals are not adopted because there is not enough information available on bears to justify any change."*

On the contrary, DFG has had sufficient data to justify changing and/or **not** changing regulations, as appropriate. For example, the regulations were recently changed to allow more opportunity for non-resident permits in Game Management Subunits 22(D) and (E).

- * *"In 1990 the National Park Service assumed subsistence management on preserve lands as a result of Alaska Supreme Court decisions"*

This statement is not correct. The Secretaries of the Interior and Agriculture originally assumed responsibility to provide a priority for subsistence opportunities on federal public lands, not subsistence management. Furthermore, this responsibility is being performed by the Federal Subsistence Board, not the National Park Service. The State is litigating this issue in *State of Alaska vs. Babbitt et. al* because ANILCA clearly did not invest management of fish and wildlife in the federal government. The public should be accurately advised of the facts in this issue in this and all other public informational documents.

- * *"The state defense of life and property laws allow individuals to protect herds, but not food supplies."*

The author is mistaken. We encourage consultation with the Alaska Department of Public Safety, Division of Fish and Wildlife Protection, for an accurate presentation of the defense of life and property provisions.

- * *"The status of the Brown Bear on the northern Seward Peninsula is essentially unknown."*

This statement is inaccurate. The status of the brown bear is known, and the State's recent study provided additional information for the area studied.

- * *"No peninsula-wide survey of bears has ever been made."*

This statement contributes to the gross misrepresentation of the State's conduct of its management responsibilities and knowledge of bear on the peninsula. A peninsula-wide survey has not been done because a survey of such a massive area is inconceivable as well as unnecessary. (Costs of a reliable survey of such a massive area would likely exceed a million dollars.) The State has appropriately focused its efforts in acquiring refined information on populations in areas which are subject to human uses. This approach is more appropriate and useful than doing a massive survey just to do one. We request such absurd statements be edited.

- * *"The Alaska Department of Fish and Game began a survey and population assessment of Brown Bears in the area around Nome (GMU 22C) in 1989. That project is essentially discontinued due to funding shortages."*

This description is a distortion. DFG initiated a three-year study in 1989 on portions of Game Management Unit 22B, 22C, and 22D. It was established and funded as a three-year study; it was funded for the three years and is a completed study.

- * *"Matching genetic data and other biological parameters will help better understand the Beringian population(s) and their interactions."*

This assertion needs explanation and a supportable basis. There is no clear project to acquire biological data, to conduct technical genetic studies, and to define "beringian populations."

- * *"They [bears] have learned, however, to raid human camps, especially subsistence camps, for drying fish or other meat."*

Not all bears do this. Intensive studies conducted in Alaska have documented that such behavior is not a uniform trait. We question the statement that bears "learn to raid . . . especially subsistence camps".

- * *"Wildlife management on the Seward Peninsula is just beginning."*

This is an outrageous allegation. DFG has had competent wildlife managers located on the Peninsula monitoring and managing healthy wildlife populations since the early 1960s. It is the National Park Service's involvement in the State's management activities which has only just begun since permanent staffing of the preserve in 1981.

In summary, there is no justification for this bear assessment project other than an idealistic desire to have more information. The bear population is healthy and satisfactorily managed by the State of Alaska.

No discussion is included of efforts to improve harvest reporting, adherence to existing harvest regulations, or populations studies or surveys. We also request corrections to reflect that harvest of bear is not distinguished as "sport" or "subsistence" in part because the demand for bear hunting is sufficiently below the sustainable yield.

We encourage the Service to consider increased studies and other efforts which would provide further protection and information on the bear population. We also recommend the Service coordinate with the State on any plans it may have concerning bear population studies, rather than independently issuing "a contract for the completion of the project", and hiring an additional resource specialist to oversee it. The State has experienced and competent staff which can conduct such work more efficiently and less expensively through cooperative funding than through the Service and contractors.

We also urge the Service to consult with the cited references and others at DFG for more current information on the status of bear information (1988 and 1991 personal communications are now cited). More recent publications and new consultations also might assist in focusing on specific information needs of the bear population since completion of the State's recent study. We also suggest evaluation of supporting enforcement of existing regulations in developed areas of the peninsula as a positive step toward protecting bear populations.

Page 45. **MANAGE FISHERIES**

We request that the title of this section be revised to "Baseline Fisheries Information". The State of Alaska manages fish, not the National Park Service, on all lands of Alaska. Nowhere does ANILCA invest any management of fish and wildlife in the Service as stated in paragraph 1. To the contrary, ANILCA Section 1314 specifically reaffirmed the State's role as manager of fish and wildlife. Such erroneous statements should be edited out of the plan before it is distributed to the public.

We disagree that "little has been done by either state or federal agencies to assess or manage fish populations". We urge the authors to contact both Sport Fish and Commercial Fish Divisions of DFG. We recognize that little was done by federal agencies during their tenure of responsibility prior to Statehood (1959), but the State has invested considerable effort since. In fact, a full-time State fisheries biologist was stationed on the peninsula beginning in 1961 and related efforts have increased ever since.

Surveys of fish populations and information on water systems have been extensively initiated in recent years on the peninsula. We are concerned that the authors have apparently made no attempt to contact DFG staff for a considerable amount of current information (no sources are cited since 1990 publication).

We are extremely disappointed that the Service has failed to appropriately prioritize the collection of baseline fishery information. This data need was discussed in considerable detail on two occasions with the preserve staff in preparation of the plan during 1990. Such baseline data should be clearly detailed and different programming levels determined based upon funding availability over subsequent years in order to fulfill this basic need of both the Service and the State.

We question the appropriateness of the Service hiring additional staff to conduct activities which are essentially the prerogative and priority of the State, such as fish counts and harvest information. We also suggest that the plan commit a timeline and specific process for cooperative establishment of a monitoring program.

Since management of fish is a State responsibility and management of habitat is the Service's responsibility, we urge the Service to prepare a "fish habitat management plan" instead of the proposed "fish management plan".

Page 77. **MANAGE MOOSE**

The State of Alaska manages moose, not the National Park Service, on all lands of Alaska as established in the State constitution and reconfirmed in ANILCA Section 1314. We urge the title of this project be revised to "Moose".

The discussion of the "Problem Statement" is substantially in error and lacks necessary citations of the information presented. A few examples are listed:

* *"ADF&G surveys in the late 1980s indicated populations well above estimates in four of five subunits of GMU 22."*

The source and data are unknown.

* *"The moose population will probably continue to expand to the west until the population is fully utilizing all available habitat."*

There is little suitable moose habitat in the west.

* *"Subsistence and sport hunting of moose in [sic] still increasing on the Seward Peninsula with sport hunters beginning to travel to Nome to hunt."*

Not so--the total number of hunters has decreased since the middle 1980s.

* *"Several moose are shot each year at Serpentine Hot Springs."*

We question the purpose of this statement. More than one moose may be shot at any given location, particularly in popular or accessible hunting areas such as Serpentine.

In contrast to the "Problem Statement", the "Staffing and Budget" section appropriately recognizes and indicates future cooperation with the State of Alaska.

Page 79. **MONITOR/MANAGE MUSKOX**

This section should be re-titled "Muskox". The State of Alaska manages muskox, consistent with the Alaska constitution and reconfirmed by ANILCA Section 1314.

We urge the authors to update the description of the "Problem Statement". For example, the herd was estimated to exceed 700 in 1992, in contrast to the estimate of 600 in 1990, as cited here.

In addition, inaccurate statements need correcting, such as:

* *"Muskox herds on the Seward Peninsula have not been monitored since the summer of 1989."*

Although DFG has not conducted active monitoring since 1989, activities have included radio-tracking and data collection through other sources. These are adequate to assess population trends.

* *"ADF&G has begun the process of identifying habitat needs."*

DFG is not conducting a habitat project. Perhaps the Service is referring to the study which the Bureau of Land Management was considering a few years ago to determine competition for food between muskox and reindeer.

* *"Monitoring must continue as herd numbers and range increase to allow cooperative management."*

The State of Alaska manages muskox. We do not cooperatively manage muskox, although we welcome opportunities to cooperate in projects which improve information related to the population's status and health. It is unclear whether more refined information is needed at the present time.

Under the recommended action section, the Service's interest in cooperating with the State in monitoring and studying parameters that affect muskox numbers is welcome. However, "10 collars" is insufficient to conduct meaningful studies. We question what the Service was implying in the statement "to maintain approximately 10 collars on each species"--of which there is only one species.

We also question how the Service intends to conduct genuine cooperation with the State in the coordination and conduct of muskox studies, when the work will be done by its own staff and through contracts "to any of several qualified organizations such as ADF&G or the University of Alaska." Cooperation with the State should include prioritization, design, and conduct of the studies.

Page 86. **ASSESS AND MANAGE WOLF POPULATION**

The title needs to be corrected. The State of Alaska--not the National Park Service--manages wolves, consistent with the State constitution and reaffirmed in ANILCA Section 1314.

Numerous misrepresentations and errors are contained in the discussion of the "problem statement", such as:

* *"Wolves in GMU 22 may be taken under a sport hunting license, trapping license or subsistence license."*

There is no "sport" or "subsistence license".

* *"Wolves found near reindeer herds may be shot in defense of life and property under state law."*

This statement is faulty. The wolves have to appear to be doing something to jeopardize the life of a reindeer, not just "found near", in order to be destroyed under this provision of state law.

* *"Neither preserve management nor the Alaska Department of Fish and Game have enough information to manage for this species"*

The preserve managers do not manage this species. Furthermore, we question why the Service does not focus more on assuring the preserve managers have sufficient information on habitat and reindeer herding activities to assist the State in its management of the wolf population.

* *"Estimated total population of wolves on the Seward Peninsula is less than 10."*

What is the source of this data? Did the author mean "on the preserve"? DFG's estimates are considerably higher for the peninsula.

The discussion under "Recommended Action" states *"The NPS would also seek reduction in harvest limits in order to allow natural regeneration of the wolf population."* We suggest that the Service consider assisting in efforts to gather population information and to acquire harvest data before it considers recommending modifications in harvest limits.

Under "Staffing and Budget", it is not clear exactly what project is proposed to justify one and one-third full-time persons for three years. Such monies and management effort might be better spent cooperating with DFG in surveys, harvest data collection, and enforcement of existing regulations.

SUBSISTENCE PROGRAM

Pages 16-17 introduce the direction of the Subsistence program portion of the Resource Management Plan. The "primary subsistence needs of the Preserve" address what DFG views as being among the priority data needs and management directions regarding subsistence activities on the Preserve. The wording of several items, however, needs improvement. For example, we suggest revising number 3 to read: "Document historical and contemporary practices and uses" We are unclear if number 4 ("refine eligibility and customary and traditional determinations") refers to refining the existing determination made previously by the State and adopted by the Federal Subsistence Board or to something else.

We recommend that linkages between the cultural resources and subsistence project statements and issues be established, when appropriate, in the plan. For example, documenting traditional ecological knowledge of resources, including the ecological relationships between species and historical changes in resource abundance, may contribute significantly to long-term subsistence management. Reference to ecological considerations occurs only in the cultural resources section of the plan. The National Park Service subsistence management program also should be designed to document future changes in subsistence use patterns resulting from such factors as changes in resource abundance, settlement patterns, weather conditions, and external harvest pressures.

Examples of such linkages and improvements to projects described within the Subsistence Program portion of the plan include the following:

Pages 97-98. Project Statement BELA-C-101.1. Produce an Ethnographic Overview and Assessment

Linkages should be made between this proposed project and S-102.1 discussed below. Assessing the existing ethnographic information for communities in the preserve area is an essential first step in designing and conducting baseline subsistence studies.

Pages 109-110. Project Statement BELA-S-103.1. Conduct Ethnographic Field Studies

This project also should be linked to S-102.1 described below. In order to minimize the impacts of research and field workers on the study communities, ethnographic and subsistence studies should be combined when possible or, if necessary, conducted at different times. Involvement of local residents in the field studies is recommended, in order to strengthen the credibility of the field team and the resulting study data, and to develop local expertise in social science research.

Pages 140-141. Subsistence Project Statement BELA-S-101.1 Manage Parkwide Subsistence Program

We support the recommended action but are uncertain if one full-time and one part-time subsistence staff positions are needed to accomplish the objectives specified in the problem statement. Park units with broader subsistence management responsibilities (e.g., coordinating the work of subsistence resource commissions) have only one subsistence specialist position. It is difficult to believe that subsistence management on preserves will require additional staff, unless they are assigned to conduct work specified in some of the cultural resources and subsistence project statements.

Pages 142-144. Subsistence Project Statement BELA-S-102.1 Conduct Baseline Subsistence Studies of Key Villages Adjacent to the Preserve

We endorse the recommended action called for in this project statement. The National Park Service and DFG have discussed the possible involvement of Division of Subsistence in conducting the baseline studies described in this proposal. We appreciate the opportunity to contribute to development of the planned subsistence studies and have

knowledgeable staff available in northwest Alaska to conduct the field work. As the Federal Subsistence Board will be unable to make customary and traditional determinations for communities in the preserve area until studies are conducted, this project statement should be assigned high priority. This project could address the traditional ecological knowledge data need discussed above and help to ensure that local knowledge would be available for use in making management decisions.

ADDITIONAL PAGE-SPECIFIC COMMENTS

Page i-iii. A map of the preserve, surrounding area, and geographic locations discussed in the plan would be useful.

Page 3. We urge the Service to introduce the purposes of the park unit in language which more closely follows ANILCA, such as "ANILCA established the preserve to be managed for the following purposes, among others:", then proceed with the quote as written. We specifically object to the plan's prioritization of purposes, i.e. "foremost purpose".

Page 6. SUBSISTENCE RESOURCES The discussion of objectives in this and many other sections of the plan frequently references the Native residents of the preserve area. While recognizing that the Native population and Native traditions may be of particular interest to the National Park Service, Title VIII of ANILCA does not limit its focus to Alaska Native residents of the region.

Page 6, SUBSISTENCE RESOURCES, paragraph 6. The State of Alaska manages "species important for sport or subsistence uses." If the preserve managers believe they need more refined population or harvest information, we strongly urge these needs be discussed and cooperatively addressed with DFG. The State's game management units and subunits are drawn based upon the wildlife populations use of the habitat and other population information. They are suitable and adequate for managing the populations in contrast to political land management boundaries which establish the preserve unit.

Page 7, paragraph 2. The State has consistently pointed out that the "Statement for Management" inappropriately established management guidelines in advance of the General Management Plan. We therefore continue to object to use of these documents in management of Alaska park units. ANILCA established guidelines and specific public involvement for park units in Alaska. The Statements for Management, however,

were developed without the required public and State participation and many statutory differences for Alaska park units were not appropriately incorporated into the guidelines.

Page 7, paragraph 2. We question the statement that the plan "sets priorities" since we were unable to locate prioritization of program activities within the projects.

Page 7, paragraph 3. We appreciate the Service's commitment to public review of this resource management plan. Such public review will provide benefits to both the NPS and the affected publics.

Page 12. ATV use has occurred extensively throughout the preserve area, not just "along the beach".

Use of Serpentine Hot Springs became a traditional activity of native and non-native residents of the area when the miners improved access into the area and dug hot ponds shortly after the turn of the century. Both winter and summer use occurs by natives and non-native alike.

Page 12-13, Section C. This section needs correction to more accurately portray the federal and state government's respective responsibilities regarding provision of a priority for subsistence opportunities versus management of fish and wildlife harvests. See related discussion above. In particular, the "management of the Preserve's natural resources" has not become "the primary responsibility of the National Park Service". The Park Service was vested with no management authority for harvests of fish and wildlife via ANILCA--only the responsibility to assure populations remain healthy. By definition, healthy populations have long been managed to provide harvests.

Page 14. One general suggestion which applies here and throughout the plan is that reference to "sport-hunting" be replaced by terms such as "resident hunting" and "non-resident hunting". This more accurately corresponds with user categories in the State's hunting regulations.

Page 17. The "Subsistence Projects in Priority Order" listing 7 does not coincide with the priorities presented on Programming Sheet II at the end of the plan.

Page 25. The "Expand Baseline Inventory and Monitoring" project inappropriately ignores the need for fisheries information in the preserve. For example, baseline studies of

Imaruk Lake and its outflow would be beneficial to both the preserve and state managers. More information is needed to identify anadromous streams; although this is referenced briefly in a later project, it should be addressed here. General fish habitat mapping is needed and would be appropriately included in this project. Studies are needed to learn which streams flow year around. Studies are also desirable to identify the fish refugia from the last ice age. Similar projects were identified in 1990 but not included appropriately here or elsewhere in the plan.

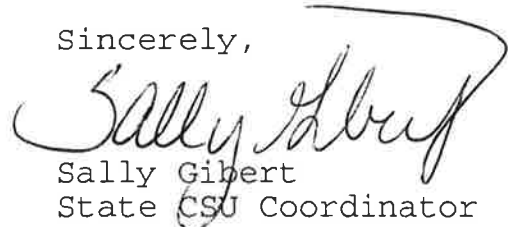
Page 48. In this project statement, the Service proposes to "prepare a coastal zone management plan to supplement those prepared by the BSNC and NANA and bring coastal management strategies within the Preserve under one management plan". First, "BSNC" appears to be an incorrect reference to the Bering Straits Coastal Resource Service Area, not the Native corporation. Secondly, it is not apparent why additional coastal planning is necessary beyond the existing district plans. Are there issues of Service interest that have not been adequately addressed in these two plans? Are there upland portions of the preserve that the Service feels should be included inside a coastal zone boundary? To avoid duplicative planning and potential confusion, the Service should work with the existing district plans, proposing modifications if necessary, to meet the Service's coastal planning goals. Since the Service does not have independent coastal planning authorities under the Coastal Zone Management Act, such cooperation with the districts would ultimately be more effective.

This section should also recognize the State's responsibilities under the Alaska Coastal Management Program, and note that the State also owns all tidelands and submerged lands adjacent to the preserve.

Page 58. Although we certainly appreciate the Service's concern to rid the preserve of toxic wastes potentially located in the numerous drums discarded on the land, the Service also needs to be aware that in some cases fuel drums are used as winter trail markers because they are visible and durable. Since some of these winter trails are extremely important to residents, we urge care in considering which are removed and encourage consultation with users of the trails.

Thank your for the opportunity to review this document. If you have any questions, please call and we would be happy to provide clarification. We look forward to review of an updated and corrected document before it is made available to the public.

Sincerely,

A handwritten signature in cursive script that reads "Sally Gibert". The signature is written in black ink and is positioned above the typed name and title.

Sally Gibert
State CSU Coordinator

cc:

Don Chase, Superintendent, Bering Land Bridge National Preserve

Harry Noah, Commissioner, Department of Natural Resources

Carl Rosier, Commissioner, Department of Fish and Game

John Sandor, Commissioner, Department of Environmental Conservation

Bruce Campbell, Commissioner, Department of Transportation and Public Facilities

Richard Burton, Commissioner, Department of Public Safety

John Katz, Governor's Office, Washington, D.C.

**CSU Distribution List
BELA RMP IRD
August 6, 1993**

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