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December 15, 1995

Mr. Aaron Archibeque  
Refuge Manager  
Togiak National Wildlife Refuge  
P.O. Box 270  
Dillingham, AK 99576

Dear Mr. Archibeque:

The State of Alaska has reviewed the *Update* newsletter concerning the Togiak National Wildlife Refuge Public Use Management Plan (PUMP). This letter represents the consolidated comments of the State's resource agencies.

The *Update* does a good job of identifying likely issues, including growth of unguided use, allocation of guide permits, camping limits, and wildlife viewing at Cape Pierce. The state looks forward to working with the U.S. Fish and Wildlife Service during this revision.

### State-owned Shorelands

As the *Update* acknowledges, the State was a major participant in the development of the original Public Use Management Plan and contributed its own chapter concerning management of State-owned shorelands and waters. As part of this Togiak PUMP revision, the State is interested in revisiting the state management section to determine if refinements are necessary, such as adjusting the camping limits on the lower rivers.

Regarding new levels of management for unguided use, the State does not believe that current levels of unguided use warrant significant additional restrictions of the state-owned shorelands. The levels of use and resulting impacts do not appear to justify additional restrictions, especially in the context of other rivers in the region. As the refuge planning process continues, State agencies recognize that additional data or analysis could lead to a reevaluation of this view.

Subsistence

The State will be looking at how proposed changes to the plan may affect subsistence uses by local residents. The plan should recognize that local residents continue to express cultural concerns about catch and release fishing. We presume that ANILCA Section 810 analysis will be completed as part of the draft plan.

Other Issues

It would also be beneficial to review 1991 state correspondence from the original Public Use Management Plan files to see if there are unresolved issues at that stage that would merit reconsideration at this time.

Thank you for the opportunity to provide these comments. If you have any questions, please call me at 269-7477 after Jan 2, 1996.

Sincerely,



Sally Gibert  
State CSU Coordinator

cc: John Katz, Governor's Office, Washington, D.C.  
Marilyn Heiman, Governor's Office, Juneau  
Diane Mayer, Director, Division of Governmental Coordination  
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