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February 27, 1995

Mr. Pete Jerome
U.S. Fish and Wildlife Service
1849 C Street N.W.
MS 670 ARLSQ
Washington, D.C. 20240

Dear Mr.  Jerome:

The State of Alaska has reviewed the U.S. Fish and Wildlife Service draft Planning Chapter of the Policy Manual. This letter represents the consolidated comments of the State's resource agencies.

State agency reviewers generally did not find any major problems with the contents of the planning chapter. Most of our comments stem from encouraging greater recognition of the Alaska National Interest Lands Conservation Act (ANILCA) and providing suggestions to further clarify the relationship of ANILCA and the policy manual.

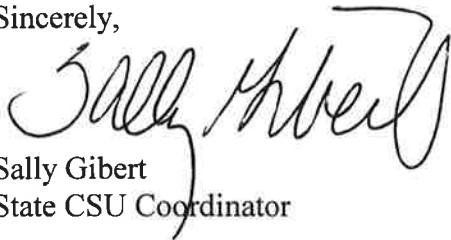
The only mention of ANILCA and Alaska refuges is found on page 5, paragraph D, which indicates that the Alaska comprehensive conservation plans (CCPs) developed pursuant to ANILCA are considered to have satisfied all requirements of the policy manual's comprehensive management plans (CMPs) and will not be converted into CMPs. It is not clear, however, what process will be followed when the Alaska CCPs are revised. The process for developing a CMP is very similar to the CCP process outlined in ANILCA Section 304, but with more detail. Some of the additional detail required in CMPs would be useful in future refuge plan revisions in Alaska; yet the Service must not lose sight of the ANILCA Section 304 provisions which are specific to Alaska. We suggest that the manual clarify that future refuge plan revisions be guided by ANILCA Section 304, and other applicable sections, *and* this refuge manual, with the explicit qualifier that any conflicts between the manual and the statute must be resolved in favor of the statute. Examples of provisions in ANILCA that must be retained include consultation with the State, Native Corporations, and local governments (Section 304(g)(4)); a description of access requirements (Section 304(g)(2)(D)); evaluation of the effects on subsistence (Section 810); and limitations on studies for the purpose of creating new conservation system units in Alaska (Section 1326).

Regarding item #3 on page 11, wilderness reviews, we recommend specific reference to ANILCA Section 1317.

Finally, we suggest the planning requirements include a review of the plans of state and municipal governments and other adjacent landowners. Where possible, the Service should attempt to coordinate with these plans, perhaps as part of issues identification (Section 2.1(b)(2)) or gathering information (Section 2.1(c)(3)).

Thank you for the opportunity to provide these comments. If you have any questions, please call me at 907-561-6131.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Gibert". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Sally Gibert
State CSU Coordinator

cc: Leslie Kerr, Refuge Planning, USFWS Alaska Regional Office
John Katz, Governor's Office, Washington, D.C.

Distribution List
FWS Planning Chapter
February 27, 1995

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