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September 12, 1995

Mr. David Allen
Regional Director
U.S. Fish and Wildlife Service
1011 E. Tudor Road
Anchorage, Alaska 99503

Dear Mr. Allen:

The State of Alaska has reviewed the draft "Public Use Regulations for the Alaska Peninsula Becharof National Wildlife Refuge Complex," published in the July 7, 1995, *Federal Register*. This letter represents the consolidated comments of the State's resource agencies.

The State appreciates that the U.S. Fish and Wildlife Service has taken an open-minded approach to regulation of public use in this refuge. The Service has addressed Alaska National Interest Lands Conservation Act (ANILCA) provisions for continued use of off-road-vehicles (ORVs) for subsistence purposes while at the same time proposing weight restrictions and other constraints to protect the refuge from damage. Earlier comments from the state emphasized the necessity of continued use of the refuge by ORVs for subsistence purposes.

We also appreciate that the Section-by-Section Analysis conveys that these size and weight restrictions will not impact subsistence users and that current levels of ORV use will not adversely affect refuge resources or subsistence uses. However, information is lacking about how ORV use under the proposed regulations compares with traditional patterns of ORV use on the refuge. This is a concern particularly if historic use levels exceed current levels and if ORV use is subject to restriction in the future. We again recommend a more comprehensive study of traditional modes of access on the refuge in cooperation with the state and the local communities.

We look forward to cooperating with the Service in outlining necessary studies and preparing the ORV issue paper proposed in the refuge manager's ~~September~~ ^{May} 23, 1994 letter to this office.

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

Sincerely,

A handwritten signature in cursive script that reads "Sally Gibert".

Sally Gibert
State CSU Coordinator

cc: Ronald Hood, Refuge Manager
Bob Stevens, Refuge Planning
John Katz, Governor's Office, Washington, D.C.
Diane Mayer, Director, Division of Governmental Coordination
John Shively, Commissioner, Department of Natural Resources
Frank Rue, Commissioner, Department of Fish and Game
Joseph Perkins, Commissioner, Department of Transportation and Public Facilities
Gene Burden, Commissioner, Department of Environmental Conservation
William Hensley, Commissioner, Department of Commerce and Economic
Development

bcc: Tina Cuning, DFG-Anch
Terry Haynes, DFG-Fbx
Patty Bielawski, DNR-Anch
Priscilla Wohl, DEC-Anch
Clyde Stoltzfus, DOT/PF-Jun
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