

# STATE OF ALASKA

TONY KNOWLES, GOVERNOR

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February 14, 2001

Elizabeth Souheaver  
Chief, Branch of Resources  
National Wildlife Refuge System  
4401 North Fairfax Drive, Room 670  
Arlington, Virginia 22203

Dear Ms. Souheaver:

The State of Alaska has reviewed the Final Policy on Maintaining the Biological Integrity, Diversity, and Environmental Health of the National Wildlife Refuge System, published in the Federal Register on January 16, 2001. This letter represents the consolidated comments of the State of Alaska's resource agencies.

The State appreciates the significant changes that have been made to the draft policy that appeared to steer individual refuge management in inappropriate and unrealistic directions. The new policy clarifies that consideration of "*historic conditions*" is stirred into the mix of other national and refuge-specific directives, but does not assume a counter-productive or overarching position. We also appreciate the clarification that individual refuge purposes remain paramount.

On the other hand, we continue to believe that the whole policy is unnecessary and makes refuge management more complex than it needs to be. What remains in the final policy might best be dealt with, if necessary, as an added consideration in the refuge planning manual. In our view, the goals and underlying intent can be sufficiently achieved within existing law, policies and refuge purposes. This new policy layer demands additional effort and consideration by both managers and the public at a time when government should be attempting to streamline management and decision making.

While we support the modification to Section 3.14 A that recognizes the Service's statutory mandate to be consistent with State fish and wildlife laws to the extent practicable, we are disappointed that other key sections describing how the Service will implement this policy lack specific references to working with the States. We are confident the Service agrees there is more to "cooperation and coordination" than consistency with State fish and wildlife laws, yet the policy does not outline how refuge managers will involve State agencies in implementation.

Please weigh these comments carefully before implementing this policy. We appreciate your additional consideration. If you have any questions, please call me at 907-269-7477.

Sincerely,

/ss/

Sally Gibert  
State CSU Coordinator

cc: John Katz, Governor's Office, Washington, D.C.  
Pat Galvin, Director, Division of Governmental Coordination  
Pat Pourchot, Commissioner, Department of Natural Resources  
Frank Rue, Commissioner, Department of Fish and Game