

STATE OF ALASKA

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April 19, 2001

Barry Stieglitz, Acting Chief
Division of Conservation Planning and Policy
U. S. Fish and Wildlife Service
4401 N. Fairfax Drive, Room 670
Arlington, VA 22203

Dear Mr. Stieglitz:

The State of Alaska requests extension of the comment period for the three draft policies published on January 16, 2001 addressing the National Wildlife Refuge System "Mission, Goals and Purposes," "Appropriate Refuge Uses," and the full policy of "Wildlife-Dependent Recreational Uses" to May 19, 2001, consistent with the extension on the remaining draft policies ("Wilderness Stewardship" and Hunting and Fishing under "Wildlife-Dependent Uses"). All of these policies affect implementation of the National Wildlife Refuge System Improvement Act of 1997. Our concerns apply to all four proposed policies relative to consistency with congressional intent and affect on the state's management of fish and wildlife. Rather than continue a piecemeal review, we would prefer to work with the Service and other states in identifying common concerns and possible solutions.

In addition, we reiterate our request for reconsideration of the Service's final compatibility regulations and policy adopted on October 18, 2000. As noted on November 16, 2000, these regulations and policy fail to provide clear and appropriate guidance to refuge managers in making decisions on refuge purposes, refuge uses; nor is coordination with state fish and wildlife managers adequately addressed.

Furthermore, we request reconsideration of the final policy on "Maintaining Biological Integrity, Diversity, and Environmental Health" published January 16, 2001. As we noted on February 14, 2001, this policy renders refuge management unnecessarily complex; and as noted for the compatibility regulations and policy above, does not provide sufficient guidance to refuge managers regarding appropriate involvement of state agencies in implementation when state responsibilities are affected.

We see a critical need to look at all the above regulations and policies in a coordinated context. For example, the Biological Integrity policy should more appropriately be incorporated as criteria in the compatibility determination process rather than presented as an additional layer of

evaluation. Similarly, each of the separate policies above (regardless of where they are in the comment deadline hierarchy) layer more evaluation processes and considerations on refuge managers -- and often their state counterparts -- creating a confusing and burdensome decision making process.

We recognize the underlying intent and value of many of these policies, and urge that they be reassessed along with the compatibility regulations and policy in a new light. We seek a commitment by the Service to mutually support our efforts to ensure that the Fish and Wildlife Service's refuge management policies are consistent with the National Wildlife Refuge System Improvement Act and the states' goals with respect to fish and wildlife management.

Thank you for your consideration. Please contact me if you have any questions or need additional information.

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