

# STATE OF ALASKA

## ANILCA IMPLEMENTATION PROGRAM

**FRANK H MURKOWSKI**  
**GOVERNOR**

550 W. 7<sup>TH</sup> AVENUE, SUITE 1660  
ANCHORAGE, ALASKA 99501  
PH: (907) 269-7470 / FAX: (907) 269-3981  
[Sally\\_Gibert@dnr.state.ak.us](mailto:Sally_Gibert@dnr.state.ak.us)

November 15, 2004

Mary Maxwell  
Acting Refuge Manager  
110 12<sup>th</sup> Street, Room 112  
Fairbanks, Alaska 99701

Dear Ms. Maxwell:

The State of Alaska is an active participant in the scoping process for the revision of the Kanuti Refuge Comprehensive Conservation Plan (CCP). We appreciate the ability to participate in scoping meetings and other opportunities to help identify issues for consideration in the plan. This letter identifies issues, concerns, or interests identified by state agencies through the scoping process to date. These issues are not listed in any order of priority.

### **General Management Trend**

Given the reported low level of commercial and non-commercial on the Kanuti Refuge and the apparent lack of significant issues concerning the natural resources within the area, a substantial change to the current CCP does not seem warranted. Unless a significant issue arises during scoping or elsewhere in the planning process, we suggest that the revised CCP not vary significantly from current management. Management that maintains the integrity of refuge habitat and fish and wildlife resources, and allows for reasonable and responsible access and utilization by the public is in the best interest of both the Service and the State.

### **Public Use Management Actions**

The 1987 CCP did not prescribe limits on public use and access management above and beyond the Management Policies and Guidelines currently used in the revision of other refuge CCPs. Since the current and projected level of public use in Kanuti continues to be lower than most, if not all, national wildlife refuges in the state, we do not see a need for alternatives that restrict the number of commercial or non-commercial visits to the refuge.

We suggest the Service review the State's December 4, 1987 letter documenting additional information and recommendations for the future Kanuti CCP revision. Enclosed is a copy for your convenience. While we expect that most of the concerns the State had in 1987 will be alleviated by the updated general Management Policies, background discussions of transportation and access should be revised, particularly regarding airports in the area, potential access to the Ambler mining district, and impacts of the Trans-Alaska Pipeline System.

### **Application of General Management Policies and Guidelines**

We encourage the refuge to incorporate the general Management Policies and Guidelines that address common issues of statewide significance for other refuges in Alaska. This guidance, developed through considerable effort at the beginning of the Alaska Region's CCP revision process, is a significant improvement over the policies used in the 1987 CCP and EIS. We understand that, in some instances, it may be necessary to tailor these policies to meet the needs of individual refuges, although at this time we do not see a need to do so for the Kanuti Refuge. If the scoping phase raises any issues that might lead to a change in the general Management Policies, we request a consultation opportunity to learn more about the issue(s).

### **Available Data and New Research**

Common to many issues is the need for adequate data to support sound decision-making. The State is interested in the type, source, and scope of the data that will provide the basis of management actions in the revised CCP. When new research is undertaken or developed by the refuge to assist with management decisions, we request early consultation in the objectives, design and conduct of studies. Our experience has shown that controversial issues can often be resolved with the collection and application of defensible objective data, and the State desires to be a partner wherever possible.

### **Studies for Traditional Access**

We encourage the Kanuti Refuge to participate with the State in a cooperative effort to document traditional (pre-ANILCA) access and activities (towards implementing ANILCA Sections 811 and 1110(a)). This information is important for evaluating current and future management of access within the Kanuti Refuge.

### **Commercial Use Permits/Stipulations**

The State is concerned about the potential development of new Commercial Use Permit stipulations that may arise as an outcome of the CCP revision process. Since ANILCA protects the public's ability to visit or otherwise utilize Service administered uplands, stipulations should be the minimum necessary to regulate commercial use and protect resources.

### **Issues Outside the Scope of the Planning Process**

Many of the issues identified in the May 2004 scoping process are associated with uses along the Dalton Highway, the Trans-Alaska Pipeline System and around Sithylenkat Lake. These issues are largely confined to lands that are either outside the refuge boundary or are on Native corporation lands. The CCP does not have the ability to manage activities on non-federal lands directly, and must limit its focus to refuge lands and ways to address external impacts.

### **Designations in the Refuge**

We support continuing the 1987 CCP management designations in which remote portions of the refuge were designated "minimal management" and those areas along the higher use rivers and adjacent to villages as "moderate management." Converting the entire refuge to "minimal management" would fail to recognize opportunities for different levels of management throughout the refuge.

**ANCSA 17(b) Easements**

The CCP should address management (signage, maintenance, etc.) of ANCSA 17(b) easements outside the refuge that provide access to the refuge.

**Fire**

Since fire is the most significant driving force for ecological change in the refuge and the current CCP emphasizes prescribed fires, we recommend the revised CCP recognize or provide an alternative which focuses more emphasis on the “natural fire regime.”

Thank you for considering these scoping comments. If you have any questions, please call me at 269-7477.

Sincerely,

/ss/

Sally Gibert  
State ANILCA Program Coordinator

Enclosure: December 4, 1987 advance scoping letter for future Kanuti CCP revision

cc: Pete Wikoff, Planning Team Leader, Kanuti CCP