

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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Greg Siekaniec
Chief, National Wildlife Refuge System
U.S. Fish and Wildlife Service
1849 C Street NW, Room 3331
Washington, DC 20240-0001

Dear Mr. Siekaniec:

The State of Alaska reviewed the draft vision document “*Conserving the Future: Wildlife Refuges and the Next Generation.*” The following comments represent the consolidated views of the State’s resource agencies.

The State is generally supportive of this ambitious effort to address the future needs of the Refuge System; particularly as it relates to changing public interests, the environment, and the agency’s ability to support its core functions related to administering the Refuge System for the benefit of the American people. We have concerns regarding substantial reliance on the internally developed document, “*Fulfilling the Promise,*” which is neither regulatory direction nor approved Service policy; however, where “*Conserving the Future*” follows the Congressional intent of the Refuge Improvement Act, we find it provides the agency with excellent guidance. In particular, we appreciate the direction to seek ways to inform the public of the many benefits the Refuge System provides, including the “big six” priority public uses, and direction provided in the following goal:

The Service must ensure basic employee training [that] explains the North American Model of Wildlife Conservation while offering training courses on hunter safety and managing hunting programs on national wildlife refuges.

This training will ensure Service personnel are well-versed in the primary purpose behind the development of the National Wildlife Refuge System, which is to provide opportunities for hunting and fishing and science-based conservation of fish and wildlife.

We also appreciate the document includes the following introductory intent to work with other conservation agencies, including state agencies, as directed by Congress and pursuant to Department of Interior regulations on State-Federal Relations at 43 CFR Part 24.

The Refuge System; however, does not operate in isolation. The Service cooperates closely with State fish and wildlife agencies in planning and administering the Refuge System. Both the Service and the State fish and wildlife agencies have authorities and responsibilities for management of fish and wildlife on national wildlife refuges. Effective conservation of fish,

wildlife, plants and their habitats depends on the professional relationship between managers at the State and Federal level. The Service acknowledges the unique expertise and role of State fish and wildlife agencies in the management of fish and wildlife.

The Refuge System also depends on the expertise of many partners in the conservation community including federal land management agencies, other federal conservation agencies, tribes, Friends organizations, and numerous non-governmental organizations with varying interests. Without these partners, the Refuge System would be unable to accomplish a great deal of its conservation work.

The document, however, includes other statements that appear to elevate the Service's role in conservation at the expense of the ongoing conservation efforts of other agencies and organizations, which dilutes the earlier message of collaboration and diplomacy. For example:

As the world's premier scientifically based wildlife conservation agency, the Service... (page 54)
[Implies other wildlife agencies are less scientific or effective.]

The era is over when the Refuge System could focus only on protecting land and water inside refuge boundaries, and leave to a roll of the dice what happened outside the boundaries. (page 17)
[Implies that wildlife management outside refuges is reckless or unprofessional.]

We strongly recommend the final document avoid unqualified, potentially inflammatory statements, and instead mirror the intent of the introduction throughout. We also request the second paragraph recognize state management agencies as a partner in the conservation community, and recommend the document provide examples of successful partnership projects. In Alaska, examples include the Mat-Su Basin Salmon Habitat Partnership and the continuing cooperative efforts to monitor migratory birds for avian influenza.

The document indicates a need to review and potentially revise several significant policies developed over the past ten years that stem from the Refuge Improvement Act, including the Biological Integrity, Diversity and Environmental Health Policy; the Wilderness Stewardship Policy; the Appropriate Use Policy; and the Compatibility Policy. While the driving force behind the review is attributed to climate change, we request the scope be broadened to ensure there is comprehensive integration among the policies on all levels. Based on our experience with implementation, many of these policies, in particular the Biological Integrity Policy, need improvement to provide clearer and more consistent direction that takes into account the purposes of individual refuges.

We also request the Service ensure state participation in policy reviews so that state interests and responsibilities, including fish and wildlife management, are taken into consideration. Currently, the document falls short in providing this essential guidance. We encourage the Service to also afford the public an opportunity to review and comment on any policy revisions. Public input affords the Service the benefit of outside expertise and encourages partnerships and cooperation, which is the cornerstone of this document. Soliciting public input for policy development is also consistent with the President's Memorandum on Transparency and Open Government, which directs specific actions be taken "...to implement the principles of transparency, participation, and collaboration."

With regard to the various climate change initiatives, we recommend initiating a step-down plan for *The Strategic Plan for Responding to Accelerating Climate Change* as the highest priority. More guidance is needed before regions, refuges, and Landscape Conservation Cooperatives are charged with developing Acquisition Plans, Wilderness Stewardship Plan updates, Invasive Species Plans, Ecosystem Service Programs and Comprehensive Conservation Plan revisions. The initial *Strategic Plan* has not provided sufficient direction for refuge and planning staff to develop cohesive plans for future management of natural resources impacted by climate change.

Comments on Specific Recommendations

Recommendation 2.9: Include climate change adaptation criteria in the overhaul of the Land Acquisition Prioritization System.

We recommend incorporating this recommendation into Recommendation 2.4 in the Strategic Growth section. Alternatively, it could be removed. The proposed overhaul of the Land Acquisition Prioritization System (LAPS) should include climate change adaptation criteria.

Recommendation 2.12: Review the farming program and identify opportunities to reduce carbon emissions and sequester carbon by restoring native vegetation.

While not specific to any Alaskan refuges, we have concerns regarding the recommendation to review the Farming Policy. We request the Service ensure that any review of agriculture on refuges remain consistent with the purposes of individual refuges and flyway management objectives. Many small refuges use agriculture as a mitigation measure to boost production of wildlife species in areas where land development limits natural production. Switching to natural foliage may inhibit meeting objectives and conflict with refuge purposes.

Recommendation 2.15: Seek conservation funding for cooperative management projects.

We recommend deleting this recommendation as it seems redundant and too vague for a vision statement. The narrative does not expound on the funding sources to be sought, and there are other recommendations that include goals for obtaining Farm Bill funding for conservation management and acquisition.

Recommendation 2.21: Develop a comprehensive communications and outreach strategy regarding Refuge System's coastal and ocean areas management paradigm to help land managers understand its place within the suite of options for conservation.

The section that includes this recommendation does not include any recognition that coastal states (Alaska has over 30,000 miles of coastline) have jurisdictional responsibilities for submerged lands three miles from shore and, in specific instances, retain management responsibilities for fish and wildlife resources within those areas, as well as further offshore, such as salmon and herring. We request this section include such recognition and a commitment to work cooperatively with state management agencies.

Recommendation 2.27: Complete wilderness reviews for all national wildlife refuges within two years and make recommendations for wilderness designation of appropriate areas during the second round of CCPs.

Wilderness studies pursuant to Section 1317(a) of the Alaska National Interest Lands Conservation Act (ANILCA) were completed for Alaska's national wildlife refuge units in the 1980s. While we recognize the original recommendations were not submitted to Congress, there is no need to revise or conduct new administrative wilderness reviews in Alaska. The State remains strongly opposed to further wilderness reviews as more than half of all designated Wilderness is located in Alaska. In addition, efforts to seek new designations are contrary to the no more clauses of ANILCA, Section 1326(b) in particular:

No further studies of Federal lands in the State of Alaska for the single purpose of considering the establishment of a conservation system unit, national recreation area, national conservation areas or for related or similar purposes shall be conducted unless authorized by this Act or further Act of Congress. [emphasis added]

We request this recommendation include a specific exemption for Alaska refuges.

Recommendation 3.1: Ensure that resources are sufficient to make investing in the application of science-based wildlife and habitat management a priority and promote a science-based approach consistently throughout the system.

While the intent of this recommendation and the associated narrative is admirable, it is unrealistic and implies that all Refuge System decisions will be based on science alone. Many decisions are philosophical in nature. For example, many are based on the policy components embedded in the Wilderness Act or the Biological Integrity, Diversity and Environmental Health Policy. While we support the intent to base all decisions on sound science, we encourage the Service to be realistic in its portrayal of the role of science in Service decisions by recognizing the inherently subjective influence of policy.

Recommendation 3.5: Institutionalize a nationally coordinated program to inventory and monitor wildlife and habitats across multiple spatial and temporal scales, and Recommendation 3.6: As part of a National Conservation Strategy, collaborate with other federal land management agencies to integrate inventory and monitoring programs.

We agree with the narrative associated with these two goals that the Refuge Improvement Act directs the Service to monitor trends of fish, wildlife and plants; however, in the context of the Refuge Administration Act, Congress recognized state responsibilities for the management of fish and wildlife and required the Service to cooperate and collaborate with States in refuge management. As such, we request this section be revised to recognize state agencies as full partners in inventory and monitoring programs.

Recommendation 3.9: Support Land Management Research and Demonstration wildlife refuges that have been established and establish and least one Land Management Research and Demonstration wildlife refuge in each Landscape Conservation Cooperative to increase research and strengthen the demonstration of science.

We recommend using the proposed Alaska Federal Lands Management Demonstration Project Act as a model for current and proposed Land Management Research and Demonstration wildlife refuges in Alaska. The language of the Act directs the Secretary of the Interior to establish a pilot program for Alaska Native tribes or tribal consortia to apply for contracts to perform certain services on federal lands in Alaska. This will further the unique purpose of the conservation system units as they relate to subsistence practices, Alaska Native culture, and the conservation of fish and wildlife habitat.

Recommendation 4.2: Work cooperatively with state fish and wildlife agencies to prepare a strategy for increasing quality hunting and fishing opportunities on national wildlife refuges with the goal of doubling youth participation in hunting and fishing on national wildlife refuges by 2020.

We suggest including a focus on participation by women in hunting and fishing on national wildlife refuges. Women's participation in outdoor activities is a significant factor in developing children's interest in these same activities. Additionally, many organizations and state agencies support programs to engage women in outdoor activities. Including women would increase partnership opportunities and the likelihood for meeting the goal of doubling youth participation in hunting and fishing.

Recommendation 4.17: Engage communities to identify what is important to them and articulate the ecosystem services that their wildlife refuge(s) provide(s). As a pilot effort to quantify these benefits, the Refuge System will prepare an ecosystem services benefit report for 10 wildlife refuges in every region within the next 10 years. If successful, these benefit reports will become a standard part of the Refuge System comprehensive conservation planning.

Preparing ecosystem services benefit reports on ten Alaska refuges in ten years seems overly ambitious. With the exception of Izembek, refuges in Alaska are all over one million acres in size. Further, there are only fifteen refuges in the Alaska region, thus this recommendation far exceeds the parameters of a pilot program. We suggest scaling back this program in Alaska.

Recommendation 4.18: Every staffed national wildlife refuge should have a friends organization, Recommendation 4.19: The Service will support Friends organizations with education, training, and capacity building resources and provide incentives for Service staff to work closely with Friends and volunteers, and 4.20: The Service will provide assistance and networking opportunities to fledgling Friends groups in marketing and diversifying their membership and leadership.

Consistent with our comments dated December 2, 1010 on the draft Friends Policy, we expect the majority of Friends efforts and activities nationwide support the Refuge System's mission by providing valuable services and information to the public, such as volunteer weed pulls, assisting with interpretive programs, or providing funds or labor for trail construction. However, the Service needs to maintain an arms-length relationship with the advocacy side of Friends groups to ensure partnership activities are not only consistent with Department of Interior ethics guidelines, but are also transparent and beyond reproach. We are unable to fully support these recommendations until this is clarified in the final Friends Policy and by extension, applies to documents that promote partnerships with Friends organizations.

Lastly, given the substantive nature of many of our comments, especially those that relate to Congressional intent, we request the revised document receive an additional round of public review before it is finalized.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

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

Susan Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator