



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Natural Resources

CITIZENS' ADVISORY COMMISSION ON
FEDERAL AREAS
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Senator Cathy Giessel
Chair, Senate Resources Committee
Alaska State Legislature
State Capitol Building
Juneau, Alaska 99801-1182

Dear Senator Giessel:

The Citizens' Advisory Commission on Federal Areas supports passage of **SJR 15 - *Oppose International Designations***. The Commission shares your concerns about designations of lands within Alaska under various international initiatives such as the United Nations Educational, Scientific and Cultural Organization (UNESCO) Man in the Biosphere Program and World Heritage Program; and the Ramsar Convention. No designations should be made without the full agreement and approval of the United States Congress, the Alaska State Legislature and the Governor of Alaska.

While technically, these international designations do not establish any regulatory authority over land owners or managers, they are always considered and invariably influence agencies' management decisions affecting designated areas. A recent example of this influence is found in the final environmental impact statement (FEIS) analyzing a proposed land exchange and road construction within the Izembek National Wildlife Refuge (NWR). The designation of the Izembek NWR as a Wetland of International Importance under the Ramsar Convention was a notable factor in the analysis of the proposal and in the decision to reject the land exchange and the road.

The FEIS concluded that direct and indirect effects of road construction would result in the loss of less than 5 acres of wetlands and would be considered "moderate" within the 416,193 acre Ramsar site. However, under the articles of the Ramsar Convention, even this moderate impact to the wetlands must be reported. Although the FEIS states that the Ramsar Convention is "*not regulatory and has no sanctions for violating treaty commitments, the terms of the Ramsar Convention constitutes (sic) a solemn treaty and are binding in international law.*" (*Izembek NWR Land Exchange/Road Corridor Final EIS- pg.4-123*)

In disapproving the proposed land exchange and road, Secretary of the Interior Sally Jewell, cited the “internationally significant” eelgrass beds in the State owned Izembek and Kinzarof Lagoons as the core of the protected area, even though the lagoons are not part of the Izembek NWR.

It is important to point out that the U.S. Senate ratified the Ramsar Convention in 1986 and the Izembek wetlands were designated concurrently with that ratification. The designation was supported by the State of Alaska. While the Ramsar designation in Izembek NWR was only one factor in the final decision disapproving the land exchange and road, this example emphasizes the importance of both Congressional and State approval before these types of designations are made.

In the 1990’s national environmental groups advocating the elimination of commercial fishing in Glacier Bay National Park cited the designation of the park as both a Biosphere Reserve and a World Heritage Site as one of the reasons they considered the State managed fishery in the bay to be an incompatible use.

The Commission is also opposed to the proposed Memorandum of Understanding (MOU) between the United States and the Russian Federation which would form an International Protected Area in the Bering Strait region until such time as Congress and the State of Alaska have been fully consulted and given the opportunity to thoroughly assess all potential social and economic impacts resulting from the formation of the area. We find no requirement in the MOU for consultation with the State of Alaska. There is a growing lack of trust between the State and Federal government over the implementation of MOU’s and other agreements. Consequently, no MOU should be signed without approval of Congress and the State of Alaska.

The idea of an international park in this region has been around for more than 25 years, as have significant local and regional concerns about creation of such an area. In 1992, the original Commission opposed a bill that would have created a Beringian Heritage International Park. The Alaska Federation of Natives also passed a resolution at its 1991 annual convention calling for meaningful participation in the Beringian Conservation Program which had been proposed by the National Audubon Society.

The Commission appreciates that the National Park Service Shared Beringian Heritage Program has funded numerous projects over the last 12 years. These projects have collected useful archeological, cultural, historical, natural resource and environmental data. We note, however, that many of these projects are undertaken not in Alaska, but within the Russian Federation. At the same time, the Commission regularly hears complaints from Federal agencies about declining budgets for managing the lands in Alaska for which they are statutorily responsible.

An examination of the proposed FY 2014 National Park Service budget, indicates that the budget for the four National Park Units managed as the Western Arctic National Parklands – Bering Land Bridge National Preserve, Noatak National Preserve, Cape Krusenstern National Monument and Kobuk Valley National Park – is approximately \$3.7 million. The Cape Krusenstern National Monument and the Bering Land Bridge National

Preserve are included in the Bering Strait region identified in the proposed MOU for formation of the International Protected Area.

The proposed budget for the Beringia program is \$661,000. While this is not a large budget, these funds would be better spent on the national park units in this region for which the National Park Service has direct management responsibility than used to support an administratively created program.

In its 2013 Annual Report the Commission included the following:

Recommendation: Avoid spending scarce federal funds and resources on special, non-designated areas such as the Beringia International Park or administratively created programs such as the National Water Trails System, National Blueways System, and the BLM Wildlands Program.

The Commission is also concerned about the potential for any international park or heritage area designation to adversely affect the ability of the State of Alaska and ANCSA Regional and Village Corporations to manage their lands without interference. The creation of an International Protected area, as envisioned in the proposed MOU, could affect the future of economic development in the region. For these reasons, the Commission supports the passage of SJR 15.

Sincerely,



Stan Leaphart
Executive Director