

# STATE OF ALASKA

TONY KNOWLES, GOVERNOR

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June 14, 2001

Barry Stieglitz  
Acting Chief, Division of Conservation Planning and Policy  
National Wildlife Refuge System  
U.S. Fish and Wildlife Service  
4401 N. Fairfax Drive, Room 670  
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Dear Mr. Stieglitz:

We appreciate the Service's decision to extend the comment period an additional 30 days for four draft policies that implement the Refuge System Improvement Act of 1997: (1) Refuge System: Mission, Goals, and Purposes, (2) Appropriate Refuge Uses, (3) Wildlife-Dependent Recreational Uses (hunting and fishing), and (4) Wilderness Stewardship. Under separate cover we will be providing specific concerns for each of these policies. We urge the Service to seek satisfactory resolution with the states, fully recognizing and incorporating our collective management responsibilities for fish, wildlife, and related uses on refuge lands in any final policies as clearly directed in the Act.

We are exceedingly disappointed that the Service has not yet chosen to consider revisions to the three sets of regulations and policies adopted in the past year for Planning, Compatibility, and Biological Diversity. We hope you will reconsider. In an undated response to the State of Alaska's April 19, 2001 letter, the Service claims a desire "*to ensure that our policies are consistent with our statutory authority.*" Yet no attempt was made to reconcile our comments on the drafts and finals of the latter policies and regulations that noted numerous inconsistencies with Congressional intent. Further, the State of Alaska and others have articulated significant problems with implementation of these policies/regulations which, in combination, create a morass of cumbersome, unnecessary steps that lack clear guidance for decision making by refuge managers and do not assure genuine cooperation with state fish and wildlife managers.

As we noted previously, “*We see a critical need to look at all the above regulations and policies in a coordinated context.*” All the above referenced policies, and the compatibility regulations, should be rewritten in total to provide a clearly detailed step-by-step approach and criteria for refuge managers rather than each policy representing an additional layer of independent and burdensome evaluations that are confusing to the public and dilute the role of state fish and wildlife managers.

The undated response to us professes a desire to have dialogue with the states in order to meet the objectives of the policies, yet dismisses our serious and significant issues raised in reviews of the previous policies. The Service’s deference to dialogue initiated with the International Association of Fish and Wildlife Agencies in March is, to date, a hollow defense. Each discussion has largely addressed specific issues of state fish and wildlife management agencies in response to presentations by the Service, whose representatives merely continue justifying the proposed policies. No significant changes in response to the problems raised by the states have resulted. Only this past week has the Service contacted the International Association to reopen discussion. Despite the lack of success at achieving meaningful dialogue so far, we remain open to the prospect of future discussions toward a more unified set of regulations and policy.

With approximately three-quarters of the nation’s refuge system in Alaska, our concerns should be genuinely reviewed and resolved prior to adoption of final policies. We again request that the previously adopted policies be rescinded and redrafted in close consultation with the states.

Thank you for the opportunity to provide these comments. We remain hopeful that a path can be found that meets both the Services' and the states' objectives, consistent with the Refuge Improvement Act.

Sincerely,  
/s/

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