

**OFFICE OF THE GOVERNOR**

OFFICE OF MANAGEMENT AND BUDGET  
DIVISION OF GOVERNMENTAL COORDINATION

STATE CSU COORDINATOR  
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July 30, 1986

Mr. Robert Gilmore  
Regional Director  
U.S. Fish and Wildlife Service  
1011 East Tudor Road  
Anchorage, AK 99503

Dear Mr. Gilmore:

The State of Alaska appreciates the opportunity to comment on the proposed changes to the management regulations for Alaska national wildlife refuges reflected in the April 30, 1986 Federal Register. This letter is submitted on behalf of state agencies and represents a consolidation of state concerns and comments.

The state supports the relaxation of regulations governing the use of live standing timber for subsistence purposes. However, we find the proposed amendment to Section 36.15(a)(2) to be unnecessarily complicated and restrictive. For example, we question the provision which would limit subsistence users to cutting 20 trees in a 20-acre block. Given the relatively insignificant level of tree cutting, this limitation would appear to be unnecessary. We understand that very few special use permits for tree cutting have been requested in recent years and that most of the need for timber for subsistence purposes is currently being met by timber from private lands within or adjacent to refuge.

In addition, it is not clear why the draft regulations propose a limit of 20 trees in 20 acres, as opposed to any other number of trees in any other number of acres. Portions of some of the affected refuges could support a much greater level of cutting, whereas some portions could not support even this level. The proposed regulation is also not clear on whether this is an annual limit or a per trip limit and whether this applies to individuals, households, or any other group.

We recommend developing a simpler regulation which would provide refuge managers with greater flexibility to respond to needs and conditions on a site-specific basis. One possible approach would be to allow cutting without restriction, except in areas needing special protection. These areas could be mapped and use of timber within them restricted as appropriate, following adequate notice and opportunity for public comment. The state would be interested in working with the U.S. Fish and Wildlife Service to

develop a simpler regulation which would protect resources, provide for the continuation of subsistence use, and maintain management flexibility.

In addition, we note that the proposed changes to Section 36.41(a)(1) give the impression that special use permits must be obtained by making application in person at an appropriate refuge office. We request that this section clarify that applications can be made over the telephone or through the mail. We also request that the regulations clearly state that all special use permits are subject to the application and appeals procedures contained in the new Subpart F - Permits and Public Participation. Further, we recommend restructuring this section to make it easier for refuge users to determine the respective location of refuge offices. It could be restructured as follows:

For Alaska Maritime (except the Aleutian Islands Unit) from Homer

For the Aleutian Islands Unit of Alaska Maritime from Adak

For Arctic, Kanuti, and Yukon Flats from King Salmon

For Alaska Peninsula and Becharof from King Salmon

For Koyukuk and Nowitna from Galena

For Innoko from McGrath

For Izembeck from Cold Bay

For Kenai from Soldotna

For Kodiak from Kodiak

For Selawik from Kotzebue

For Tetlin from Tok

For Togiak from Dillingham

For Yukon Delta from Bethel

July 30, 1986

On behalf of the State of Alaska, thank you for the opportunity to review the proposed management regulations for Alaska national wildlife refuges. If we can be of any assistance in clarifying these comments, please do not hesitate to call this office.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Sydeman". The signature is written in black ink and extends across the width of the page.

Michelle Sydeman  
CSU Coordinator

cc: Senator Rick Halford, CACFA, Fairbanks  
Commissioner Collinsworth, DFG, Juneau  
Commissioner Knapp, DOTPF, Juneau  
Commissioner Ross, DEC, Juneau  
Commissioner Wunnicke, DNR, Juneau  
Robert Grogan, Director, DGC, Juneau  
Molly McCammon, Office of the Governor, Juneau  
Members, Alaska Land Use Council  
Members, Land Use Advisors Committee

- [1272] Mr. Mike Abbott, Resource Development Council, Anchorage
- [1311] Mr. Bill Allen, Fairbanks
- [1317] Dr. Robert Baker, Anchorage
- [1312] Mr. James Barkeley, Esq., Anchorage
- [1252] Mr. Michael Barton, U.S. Forest Service, Juneau
- [1037] Ms. Joyce Beelman, Department of Environmental Conservation, Fairbanks
- [1] Mr. Jay Bergstrand, Department of Transportation and Public Facilities, Anchorage
- [994] Ms. Bonnie Borchick, Department of Commerce and Economic Development, Juneau
- [942] Ms. Tina Cunning, Department of Fish and Game, Nome
- [1373] Mr. Donald D'Onofrio, National Oceanic & Atmospheric Administration, Anchorage
- [1292] Mr. Frederick O. Eastaugh, Juneau
- [1293] Mr. Bart Englishoe, Anchorage
- [1286] Mr. Boyd Evison, Regional Director, National Park Service, Anchorage
- [469] Mr. Ned Farquhar, Department of Natural Resources, Juneau
- [1294] Dr. Hugh B. Fate, Jr., Fairbanks
- [203] Mr. Peter Freer, Department of Community and Regional Affairs, Juneau
- [1313] Mr. John Galea, Ketchikan
- [1263] Mr. Joseph W. Geldhof, Department of Law, Juneau
- [359] Ms. Lennie Gorsuch, Juneau Capitol Information Group
- [1243] Mr. Robert D. Heath, Alaska Power Authority, Anchorage
- [1244] Mr. Robert Henderson, Department of Public Safety, Anchorage
- [1247] Mr. Steve Hole, Department of Education, Anchorage
- [1271] Ms. Sharon Jean, Alaska Land Use Advisors, Soldotna
- [1297] Mr. Arthur Kennedy, Anchorage
- [1298] Dr. John Choon Kim, School of Business & Pub. Affairs University of Alaska, Anchorage
- [1270] Mr. Larry Kimball, Alaska Federation of Natives, Anchorage
- [1275] Mr. Jim Kowalsky, Tanana Chiefs Conference, Fairbanks
- [1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
- [937] Ms. Janie Leask, Alaska Federation of Natives, Anchorage
- [1258] Mr. Craig Lindh, Project Analyst Office of Management & Budget, Juneau
- [1316] Mr. Barry Moorhead, Juneau Federal Highway Administration
- [499] Mr. Donald Nielsen, Anchorage
- [594] Ms. Mary Nordale, Commissioner, Department of Revenue, Juneau
- [1314] Mr. Vernon R. Olson, Anchorage
- [595] Major General Edward G. Pagano, Department of Military Affairs, Anchorage
- [1287] Mr. Michael J. Penfold, State Director, Bureau of Land Management, Anchorage
- [501] Ms. Eileen Plate, Department of Labor, Juneau
- [1279] Mr. Gerald Rafson, Ak. Dept. of Transportation & Public Facilities, Fairbanks
- [1273] Mr. Randy Rogers, Northern Alaska Environmental Center, Fairbanks
- [1299] Mr. Wayne Ross, Anchorage
- [1315] Ms. Laura M. Schroder, Dillingham
- [1372] Ms. Marianne See, Department of Fish and Game Division of Habitat, Anchorage
- [87] Dr. Lidia Selkregg, Anchorage
- [233] Mr. Steve Sorensen, Juneau
- [1300] Mr. James F. Stratton, Anchorage
- [486] Mr. R. I. Swetnam, Anchorage
- [1242] Mr. Ike Waits, Department of Community & Regional Affairs, Anchorage
- [1239] Mr. Rob Walkinshaw, Department of Natural Resources, Anchorage
- [940] Mr. Vernon R. Wiggins, Anchorage
- [1240] Mr. Dan Wilkerson, Department of Environmental Conservation, Anchorage

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August 1986

- [1249] Mr. David Williams, Dept. of Health and Social Services, Juneau
- [1264] Ms. Vicki Williams, Department of Corrections, Anchorage