

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR

### OFFICE OF MANAGEMENT AND BUDGET DIVISION OF GOVERNMENTAL COORDINATION

WALTER J. HICKEL, GOVERNOR

CENTRAL OFFICE

P.O. BOX AW  
JUNEAU, ALASKA 99811-0165  
PHONE: (907) 465-3562

SOUTHEAST REGIONAL OFFICE

431 NORTH FRANKLIN  
P.O. BOX AW, SUITE 101  
JUNEAU, ALASKA 99811-0165  
PHONE: (907) 465-3562

SOUTHCENTRAL REGIONAL OFFICE

3601 'C' STREET  
SUITE 370  
ANCHORAGE, ALASKA 99503-5930  
PHONE: (907) 561-6131

NORTHERN REGIONAL OFFICE

675 SEVENTH AVENUE  
STATION H  
FAIRBANKS, ALASKA 99701-4596  
PHONE: (907) 451-2818

December 13, 1990

Mr. Glenn Elison  
Refuge Manager  
Arctic National Wildlife Refuge  
Federal Building and Courthouse  
101 12th Avenue, Box 20  
Fairbanks, Alaska 99701-6267

Dear Mr. Elison:

The State of Alaska has reviewed the Arctic National Wildlife Refuge River Management Plan Workbook II. This workbook describes preliminary management alternatives which the U.S. Fish and Wildlife Service (FWS) will use to develop the draft plan. The following consolidated comments are submitted on behalf of State resource agencies.

Some of the issues addressed in these alternatives are similar to those covered by the public use planning effort for the Togiak National Wildlife Refuge. Unfortunately, the knowledge and mutual understandings gained by the State and FWS in the Togiak planning process are not reflected in this Workbook. We will not reiterate all this information here, but refer you to recent State comments on the Togiak Public Use Management Plan. See also the Department of Natural Resources, Division of Land and Water Management, Director's Policy File 90-10 for DNR's policy on managing shorelands within refuges (see attached).

#### Scope of Alternatives

The State appreciates that the FWS has worked closely with the public to identify an unusually wide range of alternatives for management of the refuge. This process, however, has generated some alternatives with goals which are ambiguous and/or unrealistic. A few examples include Alternative I(A) "provide wilderness experiences that offer absolute solitude and no evidence of people", and Alternative IV(C) "maintain wilderness values at 1990 levels or higher". The former goal is clearly unrealistic, and the latter lacks definition or any reference to quantifiable measures, such as use days. The draft plan should include only

those alternatives which are consistent with ANILCA, can reasonably be implemented, and are adequately defined.

Resource values also need to be clearly defined and identified in measurable terms. According to ANILCA Section 1110, the plan must document how resource values are being affected by public uses prior to proposing public use restrictions to protect those resources. Several of the values mentioned in Arctic Refuge planning documents to date include "wilderness qualities", "solitude," and "crowding." These values are undefined, lack the same statutory protection as other values, (e.g. habitat) and their meaning varies greatly among members of the public.

#### Document Existing Public Use

The draft plan needs to document the activities of all user groups that use the river corridors within the refuge. This is especially important if FWS intends to propose restrictions on public use. Based on our experience with the Togiak Refuge, it is also valuable to collect data that differentiates various recreational uses, e.g. boating, hiking, hunting and fishing, especially for high use areas like the Kongakut. Little information on existing public use has been provided to date, particularly for non-commercial use. Harvests of important fish and wildlife species and "effort" (e.g. use days, angler hours) should also be documented where applicable for subsistence, commercial recreation (guided), and non-commercial (unguided) recreational users.

#### Tailor Restrictions to Site-Specific Needs

The plan should take into account notable differences in public use levels of refuge uplands along the major river corridors. For example, the Workbook acknowledges that over 90 percent of the estimated commercial recreational use occurs along just two north slope rivers, the Kongakut and Hulahula. Further, the vast majority of this recreational use occurs during a brief period between mid-June and mid-July. Under these conditions, management proposals for FWS-managed federal land should respond to public use concerns on a site-specific and season-specific basis to minimize impacts on compatible traditional activities and avoid unnecessary regulation.

#### Protect Traditional Activities

The plan should acknowledge that subsistence and traditional recreational activities on FWS-managed federal land, including use of aircraft, chainsaws, existing cabins, and temporary camping facilities, are authorized by ANILCA. Traditional activities are authorized under Section 1110 ANILCA unless such activities are determined to be detrimental to resource values.

Motorboats are another form of transportation specifically authorized by ANILCA Section 1110. Residents from Kaktovik travel by motorboat in several north slope streams to conduct subsistence activities. Residents from Fairbanks and several Yukon River rural communities may travel by motorboat in excess of 600 miles to conduct subsistence and traditional recreational use activities on south slope rivers.

The State owns and has management authority over shorelands, tidelands and submerged lands in the refuge. The State (Department of Natural Resources) also has management authority over all waters in the refuge, regardless of whether the waterbody is navigable. Use of motorboats is an allowed use of State-owned waters.

### Subsistence

When developing the draft river management plan, the FWS should pay close attention to documenting the nature and extent of subsistence use, especially for rivers used extensively for recreation. This information is required by Sections 810 and 811 of ANILCA to insure that subsistence remains the highest priority consumptive use in the refuge. Once again, we refer you to the Togiak Refuge planning staff who have strived to address these ANILCA requirements.

As previously mentioned, documentation of recreational uses is also important. Accurate information about recreational use patterns (both existing and projected under the various planning alternatives) is needed for the Section 810 subsistence evaluation. Such information is also essential for allocating commercial and non-commercial recreational uses as identified in Workbook II.

Since the federal government assumed subsistence management responsibilities on federal public lands on July 1, 1990, planning documents should specify if and how this will affect provisions of this or other step-down plans for the refuge.

### Definitions

Several of the definitions in Workbook II require further clarification as follows:

"Commercial Trip: One in which persons pay for goods or services delivered or transacted on the refuge." This definition places most recreational users in the "commercial use" category since most visitors charter commercial aircraft to gain access to refuge waters. We recommend this definition be changed so that guided and unguided users can be distinguished in the same manner as the Togiak Refuge Public Use Management Plan.

December 13, 1990


"River Corridor: An area that extends approximately one-half mile on either side of a river." First, the term "approximately" makes this definition ambiguous. Secondly, in mountainous terrain a one-half mile corridor could include extensive adjacent uplands which are not commonly used by river floaters. If the river corridor concept is used as a basis for proposed restrictions of public use, we suggest that the FWS explore more site-specific alternatives that consider local variations in use levels and terrain.

Relationship to Other Refuge Plans

As previously requested, the draft plan should contain an explanation of the relationship of this river management plan to other refuge plans, such as the Arctic Refuge Fishery Management Plan. Also, similar to the Togiak plan, there should be a discussion of the scope of the river management plan, including what it will and will not address. We have found that such discussions are particularly helpful to the public and other plan reviewers.

Thank you for the opportunity to provide these comments. If you have any questions, please feel free to call this office.

Sincerely,



Sally Gibert  
State CSU Coordinator

cc: George Constantino, FWS

DISTRIBUTION LIST

December 13, 1990

- [70] Mr. Ron Regnart, Department of Fish and Game, Anchorage
- [589] Mr. Bill Lamoreaux, Department of Environmental Conservation, Anchorage
- [942] Ms. Tina Cuning, Department of Fish and Game, Anchorage
- [1239] Mr. Rob Walkinshaw, Department of Natural Resources, Anchorage
- [1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
- [1266] Ms. Gail Baker, U.S. Fish & Wildlife Service, Anchorage
- [1277] Mr. Norman Piispanen, Department of Transportation and Public Facilities,  
Fairbanks
- [1372] Mr. Al Carson, Department of Fish and Game, Anchorage
- [1419] Mr. Terry Haynes, Department of Fish and Game, Fairbanks
- [1568] Ms. Jenny Olendorff, Dept. of Transportation & Public Facilities, Anchorage
- [1631] Mr. George Constantino, U.S. Fish and Wildlife Service, Anchorage
- [1639] Mr. Steve Jacoby, Division of Governmental Coordination, Juneau
- [1640] Ms. Joyce Beelman, Department of Environmental Conservation, Fairbanks