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October 21, 1992

Walter Stieglitz
Regional Director
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503

Dear Mr. Stieglitz:

The State of Alaska has reviewed the U.S. Fish and Wildlife Service (FWS) September 1992 Public Use Management Plan Update for the Alaska Peninsula/Becharof National Wildlife Refuge Complex. This letter represents the consolidated comments of the State's resource agencies.

The State is pleased to see that the FWS has developed and distributed the proposed alternatives to ensure that the full range of issues and options are being addressed. In general, state agencies believe that the range of options is reasonable and sufficiently broad.

The State will reserve general comments on the relative merits of the alternatives until the draft plan is completed and the FWS has selected a preliminary preferred alternative. We do, however, have comments about a few specific options, as follows:

Page 8, Sport Fishing & Sport Fish Guiding: Alternatives B, C, D and E would propose to cap sport fishing guides at 50 for the duration of a 5-year sport fish guiding study. The State has several concerns with this proposal. First, since there are only 18 guides currently using the refuge, such a cap appears to be unnecessary. Secondly, by proposing the cap, the refuge will be creating a premature and artificial demand for permits. Thirdly, the State urges that no caps be proposed without documentation of need and specific justification for the number chosen. It appears that this number is arbitrary.

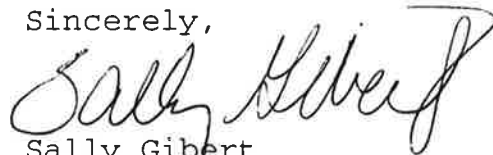
Walter Stieglitz, Regional Director, FWS

Page 12, Tent Frames, Alternatives B, D and E variously restrict or prohibit tent frames and temporary facilities. The draft plan should clarify that any such FWS proposals do not apply to state-owned shorelands. Like the Togiak Public Use Management Plan, we presume that a separate section of the plan will include the Department of Natural Resources' policies for the management of shorelands, tidelands, submerged lands and watercolumns within the refuge.

Note: The State does not give preference to one type of user and does not restrict generally-allowed activities (those that take place on state-owned land for fewer than 14 days), unless fewer than 14 days is necessary to protect the opportunity for all users to use the site.

Thank you for the opportunity to review the alternatives update for the Alaska Peninsula/Becharof Public Use Management Plan. We look forward to participating in development of the draft plan. If you have any questions, please contact this office.

Sincerely,



Sally Gibert
State CSU Coordinator

cc:

Ronald Hood, Refuge Manager, Alaska Peninsula/Becharof Complex
Carl Rosier, Commissioner, Department of Fish and Game
Glenn Olds, Commissioner, Department of Natural Resources
John Sandor, Commissioner, Department of Environmental
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Frank Turpin, Commissioner, Department of Transportation and
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Richard Burton, Commissioner, Department of Public Safety

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Alaska Peninsula/Becharof PUMP Update**

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