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May 18, 1993

George Leonard
Associate Chief
U.S. Forest Service
Washington Office
14th and Independence SW
P.O. Box 96090
Washington, D.C. 20090-6090

Dear Mr. Leonard:

Through the efforts of the International Association of Fish and Wildlife Agencies, the State of Alaska is taking this opportunity to provide comments on the Draft Interim Directive concerning U.S. Forest Service review and approval of projects on designated wild and scenic rivers.

It appears the USFS has done a good job of developing appropriate guidelines. We are concerned, however, that the USFS did not seek input from the State of Alaska directly; especially since coordination with State agencies is an important part of the evaluation process as stated in Section 2354.73.

While the State has no substantive comments on the guidelines as written, the directive should include recognition of certain unique aspects of Wild and Scenic River management in Alaska, as follows.

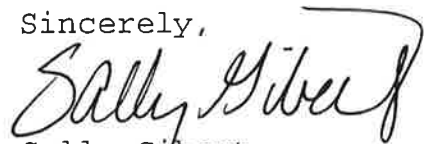
In 1980, Congress passed the Alaska National Interest Lands Conservation Act (ANILCA). This Act designated a number of new conservation system units in Alaska, including Wild and Scenic Rivers, and created special management provisions concerning public uses, access, etc. Consequently, ANILCA effectively amended application of the Wild and Scenic Rivers Act in Alaska.

To clearly define ANILCA's special provisions concerning wild and scenic rivers in Alaska, "A Synopsis for Guiding Management of Wild and Scenic Rivers in Alaska" was developed by the Alaska Land Use Council. [The Council was a cooperative body created by ANILCA with representatives from Alaska Native organizations, and State and federal resource agencies -- including the USFS -- to facilitate ANILCA implementation during its first 10 years.] Through the Council, the guidelines were unanimously adopted in 1982 by all of Alaska's public land managers. They were also reviewed and approved by the federal Solicitor in Alaska. We request that these guidelines be recognized in any effort concerning Wild and Scenic Rivers in Alaska. A copy is enclosed for your reference.

You should also be aware that the Department of the Interior, through the Bureau of Land Management, revised their policy manual concerning Wild and Scenic Rivers in 1992. Section 8351.06(F) states that no further Section 5(d) Wild and Scenic River studies will be conducted in Alaska. The State of Alaska strongly supports this provision since Congress has already comprehensively addressed Alaska river designations in ANILCA, concluding in Section 101(d) that no more conservation system units were necessary in Alaska.

Thank you for your consideration of these comments. If you have any questions, please feel free to call me at 561-6131.

Sincerely,



Sally Gibert
State CSU Coordinator

cc:

Mike Barton, Regional Forester, Alaska Region, USFS
R. Max Peterson, Executive Vice President, International
Association of Fish and Wildlife Agencies
Carl Rosier, Commissioner, Department of Fish and Game
Glenn Olds, Commissioner, Department of Natural Resources
Larry Kimball, Alaska Federation of Natives
Stan Leaphart, Citizen's Advisory Commission on Federal Areas