

OFFICE OF THE GOVERNOR

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

SOUTHCENTRAL REGIONAL OFFICE
3601 "C" STREET, SUITE 370
ANCHORAGE, ALASKA 99503-2798
PH: (907) 561-6131/FAX: (907) 561-6134

CENTRAL OFFICE
P.O. BOX 110030
JUNEAU, ALASKA 99811-0300
PH: (907) 465-3562/FAX: (907) 465-3075

PIPELINE COORDINATOR'S OFFICE
411 WEST 4TH AVENUE, SUITE 2C
ANCHORAGE, ALASKA 99501-2343
PH: (907) 278-8594/FAX: (907) 272-0690

June 7, 1993

Scott L. Schiebe
Marine Mammals Management
U.S. Fish and Wildlife Service
4230 University Drive, Suite 310
Anchorage, AK 99508

Dear Mr. Schiebe:

The State of Alaska has reviewed the Draft Final Management Plan for the Polar Bear in Alaska. This letter represents the consolidated comments of the State's resource agencies.

During the previous public comment period, Commissioner Carl Rosier of the Alaska Department of Fish and Game (ADF&G) provided comments to the U.S. Fish and Wildlife Service (FWS) on the draft management plans for polar bear, walrus, and sea otter in Alaska. In those comments, ADF&G noted that the plans should be strategic documents, and should not be directly tied to Marine Mammal Protection Act (MMPA) amendments that the FWS is proposing. Unfortunately, the plans are still written in such a way that they will become outdated as soon as the MMPA reauthorization is completed. The FWS should seriously consider revising the documents and producing separate conservation plans and management option papers for each species.

Our previous comments about State ownership of tidelands, shorelands, submerged lands and watercolumns in Alaska are also still applicable. Based on a brief review of the Polar Bear Management Plan, we found no references to State land plans and authorities as requested. We again request recognition of these issues in the final plan.

Specific Comments on Draft Final Polar Bear Management Plan

Page 17, section D--It is not necessarily true that "oil exploratory activity is declining in Alaska's Arctic" as is stated in the first sentence. The level of exploratory activity fluctuates, and has been low in recent years. However, there is still considerable activity in the Beaufort Sea region, both onshore and offshore. It is possible that exploration and other related industrial activity may increase as a result of

discoveries at the Kuvlum prospect. This statement should be deleted or modified.

Page 19, item 1--It is not self evident why the effectiveness and acceptance of regional agreements would be enhanced by granting regulatory authority to the FWS. This statement should be explained and justified.

Page 20, item 4--It is not clear why sport hunting of polar bears in Alaska would be limited to U.S. citizens by the International Polar Bear Agreement. If the Agreement does not prevent hunters from the U.S. or elsewhere from hunting bears in Canada, why would it prevent people from other nations from hunting the Alaska?

Page 26, item 131--Reference is made to a workshop to look at OSP, but it is not clear whether or not a workshop is being recommended.

Page 33, item 253d--Some explanation should be given for this item.

Page 33, item 311--It is not clear what is meant by "regulate harvests" in the title of this item. This is a critical issue, and the methods and options for harvest regulation should be discussed fully.

Page 35, item 33--The first sentence is incomplete.

Page 36, item 351--This item is dependent on MMPA amendments and should not be a specific requirement of the management plan. In contrast, items 352 and 353 could be implemented either by amendment to the MMPA or through the Secretarial waiver process, and they should be included as options in the plan. However, they should not be linked to a requirement for FWS management authority.

Page 39, item 431--In contrast to the plans for other species, this section does not link information and education programs to amending the MMPA. The discussion of information and education needs in the walrus and sea otter plans should be changed to parallel this section in the polar bear plan.

Page 39, item 433--Some explanation should be given for this item.

Pages 47-54, Management Options--In contrast to the walrus plan, this section describing the FWS desire for regulatory authority is separate from the rest of the management plan. That is much more appropriate. However, it would be better yet if this material were presented in a separate options document. That

document would be very useful for consideration during MMPA reauthorization. If it is left as part of the management plan then it will be confusing and out of place when the plan is being looked at 2-4 years in the future. In any event, all of the options for major changes in polar bear management should not be linked to FWS obtaining regulatory authority. It seem very likely that changes such as limited sport harvest and import of hides could be developed through cooperative agreements or the Secretarial waiver process. It is incorrect to assume that federal regulatory authority is an absolute necessity for developing those options while still providing for proper conservation of polar bears.

Thank you for the opportunity to provide these comments. If clarification is needed on any of our technical concerns, please feel free to contact Lloyd Lowry in the Fairbanks office of DFG at 456-5156.

Sincerely,



Sally Gibert
State CSU Coordinator

cc:

Carl Rosier, Commissioner, Department of Fish and Game
Glenn Olds, Commissioner, Department of Natural Resources
John Sandor, Commissioner, Department of Environmental
Conservation

Bruce Campbell, Commissioner, Department of Transportation and
Public Facilities

Richard Burton, Commissioner, Department of Public Safety
John Katz, Governor's Office, Washington, D.C.