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DIVISION OF GOVERNMENTAL COORDINATION



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June 16, 1997

Regional Director  
Attn: Mikel Haase  
U.S. Fish and Wildlife Service  
1011 E. Tudor Road  
Anchorage, AK 99503

Dear Mr. Haase:

Re: Final Public Use Management Plan - Tetlin NWR

The State of Alaska has received the above-referenced document. We have the following comments.

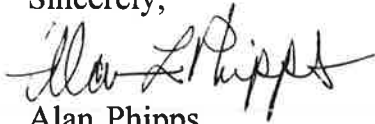
We appreciate the recognition in the document that any future proposed access restrictions will need to undergo the legally required process for establishing refuge regulations. It is our understanding that this PUMP does not propose any new access restrictions. However, we remain concerned about the adequacy of the finding of resource damage, required by ANILCA, enabling the current restrictions on access. For example, while we agree that restrictions on airboat use in sensitive waterfowl nesting areas during certain periods of the year may be appropriate, we disagree that a blanket year-round restriction is justified. We also disagree with the finding by the FWS that there was no traditional use of ORVs, including both land- and water-based modes, for subsistence.

We appreciate the recognition in the PUMP of the ownership by the State of approximately 48,000 acres of uplands, the shorelands under navigable waters, water columns, and the shorelands adjacent to or within Native corporation lands within the boundaries of the Refuge. The ORV restrictions referenced in the plan do not apply to these lands and waters, and it is our understanding that this document does not propose the extension of these restrictions onto these State-owned lands and waters.

Finally, we are concerned that the decision to delete the Cheslina Trail from the list of trails to be signed and maintained will result in resource damage and potential subsequent access restrictions.

We appreciate your consideration of these comments. If you have any questions please do not hesitate to contact me at 269-7476.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Phipps". The signature is fluid and cursive, with the first name "Alan" and last name "Phipps" clearly distinguishable.

Alan Phipps  
Project Review Coordinator

cc: Diane Mayer, DGC  
Tina Cunning, DFG  
Terry Haynes, DFG  
Patty Bielawski, DNR  
Priscilla Wohl, DEC  
Norm Piispanen, DOTPF  
Elizabeth Barry, AG  
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