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October 12, 1999

Chief, Division of Refuges
U.S. Fish and Wildlife Service
4401 North Fairfax Drive, Room 670
Arlington, Virginia 22203

Dear Sir or Madam:

The State of Alaska has reviewed the U.S. Fish and Wildlife Service draft refuge planning policy, published in the Federal Register on 8/13/99. This policy will establish requirements and guidance for refuge planning, including Comprehensive Conservation Plans and step-down management plans, and will replace Part 602 Chapters 1-3 of the Fish and Wildlife Service Manual. The comments in this letter represent the consolidated views of State of Alaska resource agencies.

The State appreciates this opportunity to review the draft policy, as well as the Service's continuing efforts to integrate state involvement in refuge planning. The State offers the following chapter-specific comments:

Chapter 1 Refuge Planning Overview

602 1.7 B states, in part, "To the extent practicable, the plans will be consistent with the fish and wildlife conservation plans of the State . . ." We are concerned that, without further clarification, the phrase "to the extent practicable" provides too much discretion in determining the consistency of the many and diverse fish and wildlife conservation management and research plans state fish and wildlife agencies have developed and implemented. We request that you pattern a revision to this language in 602 1.7 B, and like language elsewhere in the draft policy, after the 1982 Master Memorandum of Understanding between the Alaska Department of Fish and Game (ADF&G) and the Service, wherein the Service agrees:

To adopt refuge management plans whose provisions are in substantial agreement with the Department's fish and wildlife management plans, unless such plans are determined formally to be incompatible with the purposes for which the respective refuges were established.

We believe the MMOU language more adequately addresses the missions and objectives of the Service and state fish and wildlife agencies nationwide.

Chapter 2 Comprehensive Conservation Planning Process

602 2.4 C (1)(a) Planning Team We request that the Service revise this policy language to provide that the planning team **shall** issue an invitation for a representative from state fish and wildlife agencies to participate on the team. While we commend recent Service efforts to integrate state involvement in refuge planning in Alaska, we believe requiring an invitation would help ensure that conflicts arising from differing legal mandates, objectives and policies either do not arise or are minimized. This, in turn, would facilitate the completion and success of the final refuge management plan.

To be consistent with recent FACA amendments, we request the final policy explicitly allow state fish and wildlife representatives to participate in all phases of plan development to assure resolution of fish and wildlife management issues related to biological data and analysis.

In closing, we wish to express our desire for continued dialogue between the Service and state agencies in order to identify and mutually resolve current and potential issues prior to finalizing the CCP policy. If our suggestions appear problematic, we hope to be able to discuss the underlying issues before the Service proceeds. Efforts that facilitate improved Service/state coordination will assist in expeditious development of sound refuge management plans. Thank you again for this important review opportunity.

Sincerely,



Tom Atkinson
Assistant State CSU Coordinator

cc: Ken Rice, Planning Chief, USFWS, Anchorage
John Katz, Governor's Office, Washington, D.C.
John Sisk, Governor's Office, Juneau
Frank Rue, Commissioner, Department of Fish and Game, Juneau
John Shively, Commissioner, Department of Natural Resources, Juneau
Joseph Perkins, Commissioner, Department of Transportation, Juneau
Patrick Galvin, Director, DGC, Juneau