

# STATE OF ALASKA

*SEAN PARNELL, Governor*

## **CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS**

*3700 AIRPORT WAY  
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December 7, 2009

Kaja Brix, Assistant Regional Administrator  
Protected Resources Division, Alaska Region  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau, Alaska 99802-1668

Dear Ms. Brix:

The Citizens' Advisory Commission on Federal Areas formally requests that the National Marine Fisheries Service (NMFS) schedule public hearings on the proposed regulations at 50 CFR Part 226 to designate critical habitat for Cook Inlet beluga whales (74 FR 63080). The Commission requests that, at a minimum, hearings be held in the following Alaska communities: Anchorage, Homer, Girdwood, Soldotna, Kenai, Homer, Seldovia, Nikiski, Tyonek, Ninilchik, Anchor Point, Palmer and Wasilla.

The NMFS proposes to designate 4 species of Pacific salmon (Chinook, sockeye, chum and coho) as primary constituent elements (PCE) essential for the conservation of Cook Inlet beluga whales. This listing has the potential to dramatically affect future use of salmon by residents of the Cook Inlet Region, as well as those from many other areas of the state. There are a significant number of residents in each of these communities that hold commercial fishing permits to harvest salmon in the Cook Inlet region. All of these salmon species are also harvested extensively by area residents for subsistence and personal use. The recreational salmon fishery on the Kenai Peninsula and the Cook Inlet region generates some \$100 million in revenue per year and provides more than 3000 jobs. In short, the importance of salmon to residents of this region and the state in general cannot be over emphasized.

Because of the potential economic and social impacts from this proposed action, the NMFS has an obligation to hold hearings in all affected communities. It is important that area residents understand the effects this proposed listing may have on their use of salmon. While we have not fully reviewed the draft economic report, the estimated economic impact of \$157,000 to \$472,000 referenced in the notice of proposed rulemaking seems unreasonably low given the value of the fishery.

We suggest that these hearings be scheduled to avoid the holiday season, but as far in advance of the February 1, 2010 comment deadline as possible. Avoiding the holiday the season will help ensure maximum attendance and participation by the public.

Thank you for your consideration of our request. Please contact our offices to advise us of your decision or if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Leaphart", with a long horizontal flourish extending to the right.

Stan Leaphart  
Executive Director

Cc: Governor Sean Parnell  
Comm. Denby Lloyd – ADF&G  
State Board of Fisheries