

STATE OF ALASKA

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

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December 3, 1984

Dr. Robert Putz
Regional Director
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503

Dear Dr. ^{Bob}Putz:

The State has completed its review of the Alaska Peninsula National Wildlife Refuge (NWR) draft Comprehensive Conservation Plan, Wilderness Review and Environmental Impact Statement. We commend the Fish and Wildlife Service (FWS) for producing this well-written comprehensive document. Overall, this draft addresses the major issues facing the refuge and fulfills Alaska National Interest Lands Conservation Act (ANILCA) requirements. It provides adequate information for reviewers to judge the merits of each management alternative, and clearly indicates FWS management intent. This degree of clarity and specificity has greatly assisted the review of this draft refuge plan.

This letter addresses the following State concerns: Consistency with the Bristol Bay Regional Management Plan (BBRMP), the preferred alternative, management categories, recreation, fisheries management, consistency with the Alaska Coastal Management Program, and other specific comments. Some of our concerns and several of the specific items noted later in this letter are similar to our comments on the Becharof NWR draft plan. However, we recognize that the comments on the Becharof plan were submitted to the FWS after the drafting of this Alaska Peninsula plan. We, therefore, look forward to seeing revisions of both of these plans which will accommodate our concerns.

Consistency with the Bristol Bay Regional Management Plan

Three of the draft plan alternatives (B, C and D) are generally consistent with the federal BBRMP with one very notable exception. The BBRMP, which was unanimously approved in September by the Alaska Land Use Council, identified three "preferred" trans-peninsula transportation corridors; yet

alternatives B, C and D find only one of these (Herendeen Bay to Balboa Bay) to be compatible with the refuge's objectives, and out-rightly prohibit the Pilot Point to Wide Bay and Port Heiden to Kujulik Bay routes. This is totally inconsistent with the transportation provisions of the BBRMP and the State's Bristol Bay Area Plan (BBAP).

The U.S. Fish and Wildlife Service supported the provisions of the BBCMP, including transportation corridor provisions, at the Land Use Council meeting on September 13, 1984. After considerable analysis, the BBCMP concluded that the three identified corridors are the environmentally preferred routes. Based on this finding, transportation guideline #2 of the BBCMP and BBRMP states that the FWS will "to the extent legally allowed avoid actions such as land sales or recommending wilderness designations that preclude or impede construction of pipe-lines, roads or other transportation development in these corridors until such time as a final decision is made on the feasibility or appropriateness of the routes" (proposed BBCMP and RDEIS, April 1984, pages 5-25 and 5-26, emphasis added).

The refuge plan includes the Port Heiden to Kujulik Bay and the Pilot Point to Wide Bay corridors in the "minimal management" category in all four alternatives. The plan states on page 97 that "areas designated for minimal management in each of the Alaska Peninsula Refuge alternatives provides the basis for wilderness recommendations." While the corridors may be eligible for wilderness status from a physical standpoint, they are clearly not suitable because of their potential use for transportation. Including these transportation corridors in wilderness recommendations is in direct conflict with the BBRMP. The FWS must identify these three corridors in the refuge plan and specifically exclude them from any possible wilderness recommendations.

Further, to rule that these corridors are incompatible and prohibit the use of these transportation corridors is in direct conflict with the BBCMP, and its successor, the BBRMP. An incompatibility determination for these corridors is premature given that no specific development proposals exist. Title XI of ANILCA, The National Environmental Policy Act, refuge mandates, and a host of other state and federal requirements assure that any transportation development in this area would be conducted in an environmentally sound manner. By ruling that the corridors are incompatible, FWS has essentially cut off future access from adjoining State and Native corporation lands to potential deepwater ports on the Pacific Ocean. Such access may be needed to develop oil and gas and other resources on these lands.

Concern over access to local communities and to Native corporation lands is demonstrated in the petitions

(attached) from Pilot Point and Egegik and letters and testimony (attached) from the Bristol Bay Native Corporation, Alaska Peninsula Corporation, Pilot Point Native Corporation, Pilot Point Council, Egegik Village Council, Becharof Corporation and Bristol Bay Borough.

The State finds it disturbing that after spending three years working with FWS to develop the cooperative plan, the Service has rejected one of the most significant elements of the cooperative planning effort relating to federal land. Identification of the three preferred corridors was based on considerable analysis of physical and environmental resources of the peninsula, as well as negotiation and compromise. The transportation corridors are one of the few specific recommendations for management of National Wildlife Refuges contained in the BBCMP and the BBRMP, and the Service has unilaterally rejected two-thirds of this recommendation.

The prohibition of the Port Heiden to Kujulik Bay corridor also rejects one of the provision of the ANCSA 11(a)(3) lands settlement (see specific comment for page 90).

Preferred Alternative

The "Environmental Consequences" section suggests that the preferred alternative (C) has the potential for major adverse impacts on fish and wildlife populations which use the refuge. Such impacts could be compounded by similar developments on adjacent non-refuge lands used by many of these same populations. We recommend that the FWS re-evaluate the recommendations or the analysis of environmental consequences because of inconsistencies between the analysis, the preferred alternative, and the purposes of the refuge as described in the plan. For example, the "Environmental Consequences" section states moderate to major short-term impacts on caribou could occur during the development, and moderate long-term impacts during the operations, of gas fields near Port Moller. According to the FWS, Alternative C could result in a decline in caribou numbers sufficiently severe that it would take several generations to recover to their former level.

Further, we note that the discussion of alternatives underplays other potential impacts of resource extraction activities, e.g. an oil spill from adjacent Outer Continental Shelf (OCS) lease areas or from a pipeline break. Considering the extensive coastal areas adjacent to or encompassed by the refuge, attention should be given to oil spill contingency planning in conjunction with other agencies.

Management Categories

We generally support the management intent of the Minimal Management category which emphasizes fish and wildlife values and accommodation of public uses associated with these resources. We want to insure that these traditional uses are maintained, along with opportunities for agency research and other management activities. To clarify the provision for traditional uses, we request identification of how "traditional access areas" will be designated. Similarly, any wilderness proposals in the refuge should also specifically provide enough flexibility to maintain traditional uses and research/management activities.

We request that the Cooperative Management category be renamed and the narrative describing it be substantially rewritten. It presently implies that FWS/State cooperative management is only applicable in State controlled areas. We suggest that the category be renamed "State waters". The narrative should indicate that the FWS will seek cooperation with the State, including the Alaska Department of Fish and Game (ADF&G), DNR and The Department of Environmental Conservation (DEC), so that the waters will be managed in a manner compatible with refuge purposes. It is also important to recognize that the State has existing management authority and cooperative agreements applicable to refuge lands.

Revision of this narrative should also note that maintenance of "existing natural fish and wildlife populations" will not automatically avoid the need to enhance the lake fishery unless future cooperative agreements take into account harvests on these populations when they are outside refuge boundaries.

Recreation

The plan gives inadequate attention to the growing recreational demands of the region and the State. Whereas considerable development improvements are discussed regarding oil and gas activities, little enhancement is considered for visitor access, tourism, and related recreational activities (see specific comment for page 147 in the attachment). Further, the plan's statement on page 96 that "non-wildlife oriented recreation generally will not be permitted" seems inappropriate. There are many forms of recreation (hiking, photography, skiing) which would not be wildlife oriented but would be compatible with refuge objectives. We suggest that the final plan be more responsive to the recreational opportunities of the refuge. We also suggest that the administrative offices of the refuge also function as visitor contact points for disseminating information about recreational use and access.

Fisheries Management

The ANILCA Section 304(e) indicates that fisheries enhancement activities are permitted on refuges, but the plan, as written, prohibits these activities on refuge lands. The refuge contributes to a significant commercial fishery that provides many fishery-related dollars in the local and statewide economies. Due to natural phenomenon such as earthquakes, land slides, and volcanic action, habitat enhancement and/or hatcheries might at some future date prove necessary in maintaining existing salmon fisheries. This plan should not rule out these possibilities and we strongly urge deletion of the enhancement prohibition from the plan.

Most of the southern Alaska Peninsula is open to set gill-netting and, although most fishermen use their boats for living quarters, several cabins have historically been used for this purpose. As recognized in the plan, fishing is the mainstay of the economy. If interpreted to the letter, the commercial fishing policy in Table 17 (page 78) prohibits fishermen from using land based sites. There are a number of places along the Pacific Coast where gear is temporarily stored on land. This policy needs to be modified to provide for temporary use of refuge lands and allow for historical or traditional use of refuge lands. Prohibition of these existing commercial fishing facilities on the refuge is inconsistent with the intent of ANILCA Section 304(d). We strongly urge FWS to revise this policy.

Consistency With The Alaska Coastal Management Program

The Division of Governmental Coordination has also completed the coastal consistency review of this draft plan. Based on our review, the Division agrees with the FWS determination that the plan is consistent with the Alaska Coastal Management Program. However, we would prefer fuller treatment describing the basis for making this determination. In the last few months, we have provided your office with a suggested evaluation format which would accomplish this objective.

We have a further general concern that the Alaska Peninsula NWR document fails to acknowledge the Alaska Coastal Management Program review process. Permitted activities on federal lands that "directly affect" coastal resources are subject to the coastal management program in effect at the time the project is permitted, yet the plan does not address this. We request that the final plan correctly reflect the process under which actual development would occur in the Aleutians East and Bristol Bay Coastal Districts.

We are also concerned that this plan only outlines general intent with details to follow in a more specific management

plan. It is the State's position that more detailed management plan must also undergo a formal consistency review and public comment before implementation. In other words, a favorable consistency determination for the plan at this time does not automatically guarantee that the recommended actions will be consistent with the Alaska Coastal Management Program when detailed later in the specific management plans. We therefore recommend that FWS involve the local Coastal Resource Service Area Boards and State agencies in the development of the more detailed management plans.

We appreciate the opportunity to provide comments on this draft plan. If we can be of assistance in clarifying any of these comments, do not hesitate to contact this office.

Sincerely,

Robert L. Grogan
Associate Director

By:



Sally Gibert
State CSU Coordinator

Enclosure: Attachment with Specific Comments

cc: S. Leaphart, CACFA
J. Leask, AFN
R. Davidge, DOI
M. Frankel, ALUC
R. McCoy, ALUC
State CSU Contacts

ATTACHMENT

Specific comments from the State of Alaska
Alaska Peninsula NWR Draft Comprehensive Conservation Plan
December 3, 1984

- Page 1, paragraph 1 - We request that the FWS reference specific supplemental management plans and specify the review process and anticipated planning schedule.
- Page 19, The document seems to suggest that prospects for locating petroleum resources within the refuge are high to moderate. The text should be revised to describe the area as having low to moderately low petroleum potential, according to DNR's Division of Oil and Gas.
- Page 32, Table 4 - This table should be titled "Description of ecosystems and subcomponents on Alaska Peninsula Refuge and adjacent areas" (emphasis added). This change more accurately reflects the land status of the area described, including state and private up-land areas and state lands below mean high tide.
- Page 36, paragraphs 3 and 4 - To be consistent with the remainder of this section and for clarification, the titles of these paragraphs could be changed to "Sockeye (Red) Salmon" and "Chum (Dog) Salmon" (emphasis added).
- Page 39, paragraph 4 - The figure of 100,000 emperor geese and 40,000 cackling Canada geese may be an overestimation. The population of emperor geese which migrates along the Alaska Peninsula is estimated at 71,000 geese and the population of cackling Canada staging in the Ugashik Bay/Cinder River area is about 14,000. It should also be mentioned that these goose populations are experiencing a long-standing decline.
- Page 43, Brown (Grizzly) Bear - Reference to brown bear "territories" exceeding 400 mi² should be corrected to read "seasonal" or "home ranges" (a territory is generally defined as a defended area). Glenn and Miller (1980, Fourth International Conference on Bear Research and Management, pp. 307-312) found that seasonal home ranges averaged from 100-300 mi² on the Alaska Peninsula.
- Page 43, Caribou - The "Alaska Peninsula caribou population" is considered to have two distinct segments - the Northern and the Southern Alaska Peninsula herds. The Northern herd is estimated to contain 19,000 caribou and is located between King Salmon and Port Moller. The Southern herd ranges between Port Moller and False Pass and possibly includes the several hundred to a few thousand caribou

on Unimak Island. There are approximately 10,000 caribou in this herd. We disagree with the phrase stating that the herd "is one of the few that has not experienced a drastic population decline in the last decade". It should be replaced with "All segments of the Alaska Peninsula population are increasing from low population levels of the 1940's."

Page 46, Moose - Plant succession toward climax is not a suspected cause of recent low moose calf recruitment. This statement should be deleted from the draft.

Page 50, paragraph 3 - The statement that Natives east of Port Moller are not Aleuts should be deleted or some ethnic identification should be provided.

Page 50, column 3, paragraph 3 - This paragraph mentions that recreation and tourism provide jobs in "larger communities" yet no specifics are given. We request clarification.

Page 50, column 3, paragraph 4 - This paragraph incorrectly implies that Cold Bay is the only community with an economy that is affected by outside forces. Any community whose economy is based on commercial fishing is also controlled by outside forces over which there is little local control.

Page 51, Projected Changes - A statement is made that the dependence on subsistence resources will eventually decline. It is further stated that hunting, fishing and trapping activities will remain an important activity for recreation, socializing and expressing personal identity. The statement incorrectly implies that the only dependence is economic, and that eventual decline in subsistence resource dependence will come within the life of the plan (10 to 15 years). Nebesky et. al. (1983) state that the communities in and near the refuge, more than the vast majority of other Bristol Bay villages, will be likely to sustain existing patterns of resource use (page III-46).

Page 52, column 2, paragraph 2 - The residents of the Chigniks are strongly independent and the communities are quite distinct. Chignik Lake has stronger ties to Perryville than it does to Chignik Bay. Residents of Chignik Lake move to "CWF" side of the lagoon, not the "flat" side where year-round residents live during the fishing season. There is not a tremendous amount of travel between the three Chignik villages as one might suppose. Chignik Lagoon and Chignik Bay have kinship ties to Kodiak, more so than the other communities. Chignik Lake, Perryville

and Ivanof Bay tend to look to Anchorage for medical, shopping and vacationing purposes. All regional residents tend to look to Anchorage or Seattle for shopping and boat services, but Chignik Lagoon and Chignik Bay more so to Seattle than the rest of the communities.

Page 52, Interethnic Relations - We question the basis for the statement "Many peninsula residents have attempted to shed the visible signs of the traditional culture" and the reason for including it in this draft.

Page 52, Perceptions... - Public meetings for the BBCMP revealed unanimous concern regarding oil and gas development in upland areas, but no general opposition. People were strongly opposed to offshore oil and gas development. Economic diversity is desired by some residents, provided the fisheries can be protected.

Page 53, column 2, paragraph 3 - Perryville is an Indian Reorganization Act (IRA) tribal council chartered in 1934, the only one in the Bristol Bay area.

Page 55, paragraph 2 and Table 9: For a more accurate representation of the value and numbers of salmon originating from the refuge, 5-10 year averages should be included rather than one year's (1981) data. The source for Table 9, "ADF&G, 1981 preliminary data" is outdated. Commercial catch and ex-vessel value figures for the identified drainages are available for the 1982 and 1983 commercial salmon season from ADF&G's Commercial Fisheries Division. Preliminary data is available for the 1984 commercial season as well.

Page 56 and 57, Tables 10 and 11 - We request identification of the source of these data. In reviewing ADF&G (Mills, 1983) data for the refuge area, we found 4,754 days spent sport fishing. Assuming only 3 hours per day, we calculate over 14,000 hours per year - almost twice the FWS estimate (7,478). Given this example and the difficulties in separating dependent uses, we question the validity of these data.

Page 57, Subsistence - A reference should be included for the source of the subsistence harvest data presented.

Page 61, paragraph 1 - Reference to the harvesting of trees for firewood would be more accurate if it stated that driftwood is the primary source (although alder is used in smokehouses).

The paragraph also states that sea mammals are not a significant subsistence resource. We have reason to

believe that the communities of Perryville and Ivanof Bay may use substantial numbers of seals and other sea mammals.

Page 61, Unit classification - We assume that the unit breakdown (Ugashik, Chignik, Pavlof) refers to refuge management units; however, on page 52 Port Heiden is referred to as an upper peninsula village and in this section it is included in the Chignik unit.

Page 61, Figure 25 - "Marine invertebrate gathering" could include a dashed line from mid-March through May. We also note that the titles do not coincide with the units listed. We suggest listing communities on the seasonal rounds or making an adjustment in the way the units are organized.

Page 62, paragraph 1 - Most seals harvested by residents of Chignik Lake and Chignik Lagoon might be taken in the Lagoon, but this is not true for residents of Ivanof Bay, Perryville, or Port Heiden.

When discussing the Chignik region, it should be clarified that there are more communities involved than just the three beginning with "Chignik." Also, if data used in this section are to include Port Heiden, waterfowl should be added to the resources.

Page 63, Projected Changes - Salmon harvests on the Naknek and King Salmon Rivers have not dramatically increased. We suggest this section be deleted from the draft.

Page 64, Table 13 - As discussed in our comment for Table 9, the information presented is outdated. More recent information on salmon escapement goals and escapement levels is available from ADF&G's Commercial Fisheries Division. To avoid any misinterpretation of ADF&G escapement data, ADF&G should be identified as the original source and not the Institute of Social and Economic Research.

Page 64, Recreation - The estimate that 26% of moose harvested on the refuge are taken by recreational hunters is probably too low. The ADF&G information indicates that in Subunit 9E local harvest accounts for only 14% of the reported moose harvest. There is no evidence to suggest that it would be higher in the refuge and it may actually be lower. The figure of 70% for local caribou harvest might also be high, although how these figures were calculated is not given. It should be noted that the areas immediately around Port Heiden and Pilot Point are not in the refuge and an area considered important for caribou hunting by Chignik Lake residents, the Wildman Lake area, is also outside the refuge.

- Page 66, Hunting - Brown bear and moose seasons do not overlap on this refuge, therefore there are no moose-bear multi-species hunts. Additionally, the bear seasons alternate between spring and fall each year.
- Page 68, Sport fishing - It is noted that Ugashik Lake is renowned for trophy grayling and excellent salmon and Dolly Varden fishing. Although there is good grayling fishing, ADF&G surveys reported that salmon fishing is only excellent for small periods of time in the late summer and early fall. This section should also note that there are Arctic char, not Dolly Varden, in Ugashik Lake.
- Page 68, Other Wildlife Related Activities - Camping is included twice in this section as 16% and 13% of public use. We suspect one of these refers to hunting.
- Page 68, Projected Changes - If overcrowding of the refuge is perceived as a potential problem, it would be desirable to outline how FWS intends to define the problem and what actions are proposed to avoid or correct it.
- Page 70, Guide Services - A reference for these data should be cited.
- Page 70, Other Activities - The assessment work section should be discussed in greater detail to reflect the increase in exploration work in the refuge area and the implications for road access, water quality degradation, reclamation, etc.
- Page 73, Paragraph 3 - Navigable waters are mentioned briefly in this section on land status, but no explanation or discussion is given. The plan should recognize that the State owns navigable waters and submerged land. It should also note the process for making navigability determinations and identify which rivers have been determined to be navigable. (See comment for page 76)
- Page 75, Moderate Management - This management category attempts to accommodate increased recreational use, industrial use and active wildlife management in the same area. To avoid user conflicts with these potentially incompatible uses and possible resources degradation, FWS should carefully consider temporal and/or spatial separation of these uses and users.
- Page 75, Minimal Management - The statement "Existing fish and wildlife populations would be maintained in their present state" is unrealistic from a biological perspective. Fish and wildlife populations, by their nature, are not static nor can they be maintained

static. We recommend that this sentence be deleted or revised to reflect the dynamic conditions inherent to these populations.

Page 76, Column 1 - The plan indicates that navigable waterways within the refuge are included in the Cooperative Management category. Portions of the Dog Salmon, Meshik, and Alec rivers are navigable and should either be shown on the alternatives maps or specifically mentioned here.

In our opinion, research studies by themselves do not constitute a management effort. Management is the application of information gained from these studies.

The BBCMP does not prohibit oil and gas development in Ugashik Lakes. Rather, it restates Alaska Statute 38.05.140(f) which prohibits surface entry for oil and gas development in any State-owned submerged lands within the State fisheries reserve. It does not prohibit leasing and developing via directional drilling from upland areas.

Pages 76-87 - As the Cooperative Management areas involve joint management by the State and FWS, the plan needs to more clearly describe who will regulate uses in these areas. As noted earlier, fisheries enhancement should be permitted based on site specific evaluation.

Page 77, Table 16 - "Roads" and "Airstrips" are noted as "not permitted" in the intensive and moderate management categories of the summary. This is inconsistent with the descriptions of the management categories (p. 75) and the more specific information on page 85. Also, the asterisk on "Economic Uses" is not foot-noted on this table.

Page 78, Fisheries Enhancement - We request that the plan recognize important existing management and enhancement projects such as Chignik/Black Lakes and the Russell Creek hatchery. Although it appears doubtful that new ones would be built in the near future, FWS should not propose restrictions that would close the door completely. Numerous sites could be developed along the Peninsula in the future, particularly one in Pavlof Bay. A fish ladder project has been approved for Middle Creek, however the ladder is not yet built. This project has the potential of adding several hundred thousand pink salmon to the commercial harvest. Another continuing necessary activity is stream clearance which includes removal of log jams and beaver dams.

- Page 81, Table 17, Airplanes - The phrase "Includes both float planes and fixed-wing planes..." should be changed to "Includes float, wheel and ski-equipped fixed-wing aircraft..." We request clarification of any proposed aircraft restrictions which may be imposed in permitted areas and whether the "recreational use" provision applies to air-taxis, industrial and administrative flights.
- Page 81, Table 17, Helicopters - This section should mention or reference the "use restrictions" which are proposed for helicopter activities. We request that FWS recognize the State's continuing need to use helicopters in research and management activities on the refuge.
- Page 83, Table 17, Trapping - The FWS should clarify the definition of "recreational trapping".
- Page 84, Table 17, Cabins - The FWS management intent for existing cabins and their maintenance should be clarified at this point or there should be reference to page 96 of this draft.
- Page 84, Table 17, Boat Launch Sites - The FWS should clarify why these sites are "not applicable" to Ugashik Lakes.
- Page 85, Table 17, Roads and Airstrips - See our comments for page 77. The difference between "not permitted" and "not provided" is the primary source of confusion.
- Page 85, Table 17, Geophysical Exploration - This use should not include geologic mapping. This can be done in many areas without extensive (or any) ground work.
- Page 86, Table 17 - Transmission Lines/Pipelines - The transportation corridors should be independent from the oil and gas management options. The option to build a corridor should remain open regardless of the management scheme.
- Page 87, Table 17, Timber Harvesting - This section should be expanded to include FWS' management intent regarding the use of timber for cabin repair, firewood and in support of other activities (e.g. camping, fishing, trapping). It should also be noted that driftwood is the primary source of wood used for the purposes above.
- Page 88, Boundaries - The reorganization of the three Alaska Peninsula refuges is a logical administrative action which should aid in management of NWR lands. The placement of USFWS/National Park Service personnel in Chignik, an important aspect of the reorganization,

would also help facilitate management of this large land area.

Page 89, photo caption - "Alaska Peninsula caribou herd" should be "Southern Alaska Peninsula caribou herd" and the phrase "one of 13 in Alaska" should be deleted or changed to "one of 25 in Alaska."

Pages 89-91, Land Exchanges and Cooperative Agreements - Because of the variety of land owners and managers around the refuge, we are pleased with FWS' recognition that land exchanges and cooperative agreements are a key to the success of any alternative. We would like to note that several of these exchanges should have been proposed as part of the Bristol Bay Cooperative Planning Process.

Page 90, Column 2, 11(a)(3) lands - If the BBRMP is signed by the Secretary of the Interior, the 147,0000 acres of land in the Port Moller area would be conveyed to the State. The BBRMP does not merely result in FWS support for conveyance as stated here.

The four alternatives also fail to recognize one of the terms of the ANCSA Section 11(a)(3) settlement in the BBRMP, specifically that "the USFWS will take no action to stop port site development" on the 11(a)(3) lands at Kujulik Bay (page 4-67 and 6-18 of Proposed BBCMP and RDEIS, April, 1984).

Regarding relinquishments of State selections at DNR sites in the Alaska Peninsula NWR, since the State's relinquishments will occur regardless of Native land claims, delete "pending resolution of Native claims to some of these lands." The State also has agreed to relinquish certain selections around Balboa Bay (see page 4-28 of Proposed BBCMP).

The State Critical Habitat Areas (SCHA) at Ugashik Bay, Port Heiden and Nelson River were established by the State Legislature, not ADF&G. The Nelson Lagoon area is in the Port Moller SCHA, which also includes other essential waterfowl habitat around Port Moller.

Page 91, Cooperation and Coordination With Other Government Agencies - The plan should be expanded to include the interrelationships of the Alaska Peninsula management plans and those for Izembek NWR, Becharof NWR, Aniakchak National Monument and Preserve and adjacent state and private lands. The plan should also note that the Alaska Statute establishing the Bristol Bay Fishery Reserve, AS 38.05.140(f), prohibits surface entry for oil and gas in the Ugashik Lakes.

Page 92, Resource Management Directions - According to the Memorandum of Understanding between the FWS and the ADF&G signed in 1982 and outlined here, "...the ADF&G has the primary responsibility for managing resident fish and wildlife resources on the Refuge and Service has primary responsibility for managing habitats." More specifically, the plan states "The Service will concentrate its resources on enhancing fish and wildlife habitats by managing access, recreation, vegetation, fire and economic activities on refuge lands. The Service will also carry out studies and basic research relating primarily to habitat management and the impacts of management activities and public uses on refuge resources." However, under this section the plan lists 10 FWS priorities, none of which relate specifically to the study of vegetation, habitat inventory, range carrying capacities, or other habitat specific research. We recognize that the refuge staff can provide valuable assistance to the ADF&G in conducting game surveys and in cooperating in the management of resident game species, though we are concerned about avoiding duplication of effort. We request that the list of FWS priorities be revised to be consistent with the primary responsibilities as stated in the Memorandum of Understanding.

Page 92, Data Collection and Research - Inventory of mineral resources should be included. The description of the Alaska Mineral Resource Assessment Program (AMRAP) is not sufficient to address this issue, as the plan does not actually propose any inventory of these resources by the U.S. Geological Survey, Bureau of Mines or FWS. Exploration by the private sector is unlikely as the area is closed to mineral entry.

Page 93, Wildlife Management - The first paragraph refers to the "current healthy condition of wildlife populations." This should be amended to note that the moose population cannot be considered "healthy" if "healthy" refers to historical abundance. We also request addition of the phrase "at this time" to the last sentence of this paragraph.

The last 2 paragraphs refer to wildlife population objectives. As agreed in the 1982 Memorandum of Understanding, this section should also include reference to the adoption of ADF&G species management plans for the refuge area unless these plans are formally determined incompatible with refuge purposes. These plans have been provided to the FWS staff in the "Alaska Peninsula National Wildlife Refuge Resource Management Recommendations" (February, 1984).

Page 94, Historical and Cultural Resources - The State Office of Historic Preservation has no comments on these general statements about protection of historical /cultural resources, but intends to offer substantive comments when more detailed plans are prepared in the future.

Page 94, Air and Water Quality - DEC is the only State agency which establishes and enforces air or water quality standards. DNR is responsible for maintaining instream flow of waters and for allocating water use. ADF&G is responsible for the protection of anadromous fish habitat and other fish and wildlife related water resources. The three agencies cooperate where these responsibilities are interrelated.

Page 95, last paragraph - "ADF&G subsistence office" should be "ADF&G, Division of Subsistence."

Page 96, Cabin Management - This section should include a statement about the maintenance of existing cabins.

Page 98, Wild and Scenic River Management Directions - The ANILCA Section 101(d) states that the Act provides for all necessary Conservation System Units (CSU's) in Alaska. The legislative history of this section further emphasizes that any new CSU's must be approved by Congress. Designation of the Meshik as a Wild River would be creation of a new CSU and would, therefore, be subject to the provisions of this section. Although the BBCMP endorses this study, the FWS should carefully consider these provisions and explain them to the public prior to formally proposing to study the Meshik River for this designation.

Further, we request clarification about what is meant by "water resource projects". Also, the BBRMP requires this study to deal with potential trans-peninsula transportation development in the corridor from Port Heiden to Kujukik Bay.

Page 101, Other Economic Uses - The plan should state that there is little to no potential for either agriculture or timber harvest in the Alaska Peninsula NWR refuge. Furthermore, the rationale for prohibition of grazing contained in the BBCMP should be included here.

Pages 103, 108, 113 & 116, Alternative Maps - The plan's alternatives fail to exclude State-owned lands that are within the refuge boundaries. There are several small tracts of State TA'd (or patented) land near Ugashik Lakes and Wide Bay, and several townships

near Herendeen Bay (T.51S., R.72W.; T. 51S., R73W., and T.51S., R74W. (a small part may be in the refuge)) which have been TA'd to the State. Depicting most State selected land as part of the refuge is probably appropriate as the State proposes (through the BBAP) to relinquish all selections in the refuge except the so-called 11(a)(3) lands near Port Moller.

The village of Nelson Lagoon should be depicted on the maps of alternatives. Also, we note that the colors used on these maps for the categories "Enhanced Public Use" and "Moderate Management" are virtually indistinguishable from each other.

Page 111, Column 2 - The text indicates that 5% of the refuge is proposed for moderate management, while Table 21 indicates 1%. Also, it would be appropriate to mention the location of the enhanced public use management area in the text in a manner similar to the references to the other categories.

Page 127, Column 2 - Private lands within or on the periphery of the refuge, rather than refuge lands, could accommodate any tourist facilities needed. Cooperative agreements should be considered to ensure compatible operations.

Page 135, Alternative C - We question the assumption that a road would be built from Egegik to the production site within the refuge: a more reasonable assumption might take into account the existing rolligon trail from Pilot Point to the general area. AMOCO Production Company is currently drilling an exploration well in Section 10, T28S, R48W, and has made extensive use of this 23 mile trail. Directing impacts to those areas already disturbed even if only for analytical purposes should be encouraged by all land managers.

Also the assumptions used for each alternative should be standardized. All alternatives should assume production of oil on the Bering Sea OCS, with transport via pipeline across the Alaska Peninsula. If production of natural gas is used as an assumption, the location should be kept constant in each alternative.

Page 147, Evaluation of Alternatives. It seems that one of the underlying assumptions in this assessment is that the only (or primary) cause for increased use of the refuge's resources will be the increased access that would result from oil and gas exploration and development. This is inconsistent with what the ISER and others predict for the Bristol Bay region as a whole. Current population trends in the region and State, combined with increasing

statewide tourism and recreation, will lead to a significant increased demand of the region's resources by both consumptive and nonconsumptive users. This evaluation fails to address this issue, and incorrectly implies that oil and gas exploration is the only factor causing environmental impacts on the refuge.

Also, the assessment should acknowledge that the action of allowing oil and gas leasing and transportation corridors does not assure that these events will occur, nor does the lack of designation of pipeline corridors on refuge lands preclude all oil and gas development. Oil and gas development can occur on state lands, Native corporation land and the Federal OCS. Alternative A, for example, assumes that since the refuge plan prohibits a trans-peninsula corridor at Balboa Bay, one will not be necessary. However, the reason for building a corridor would be an oil and gas discovery on state or federal OCS lands on the Bristol Bay side of the Peninsula. This need for a corridor is, therefore, not exclusively a function of the corridor's designation.

Page 150, Column 2 - It is stated that "the activities of all federal agencies should be consistent, to the maximum extent practicable, with the approved State coastal management plan." For the sake of accuracy, federal actions not only should be consistent, they must be consistent with the Alaska Coastal Management Program and any district plan.

Page 152, Table 28, Fish - This section should include an analysis of environmental impacts of the various alternatives on salmon resources and the potential for salmon rehabilitation and enhancement.

Page 162, Appendix B - In the introduction to this section "Becharof" should be "Izembek."

Page 186, Appendix H - This copy of the ADF&G/FWS Memorandum of Understanding should indicate that it was signed by both parties on March 13, 1982.