

# STATE OF ALASKA

BILL SHEFFIELD, GOVERNOR

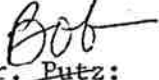
## OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET  
DIVISION OF GOVERNMENTAL COORDINATION

2600 Denali St., Suite 700  
Anchorage, AK 99503  
274-1581

July 16, 1984

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

Dear Mr.  Putz:

The State has completed its review of the Becharof National Wildlife Refuge (NWR) Draft Comprehensive Conservation Plan, Environmental Impact Statement and Wilderness Review. This plan provides a good review of refuge resources and an effective representation of the various management options and their effects. In most cases, it also presents the reader with a clear exposition of the intentions of the U. S. Fish and Wildlife Service (F&WS) in the future management of the refuge. We are taking this opportunity to offer some comments, technical corrections, and suggested changes which will improve the final plan.

We are concerned with the range of options and the definitions of the various management alternatives. As noted in our comments on the Kenai NWR plan (7 May 1984, page 18), alternative scenarios such as these frequently require the reviewer to accept undesirable requisites when suggesting management methods. This hampers the formulation of any "preferred" management alternative. For example, enhancement of recreational opportunities isn't considered except in combination with extensive oil and gas leasing. We suggest that F&WS be more flexible in the management options presented to reviewers in future refuge plans.

With the corrections or clarifications noted below, we believe that Alternative C's management actions will adequately fulfill the purposes of the refuge and the agreements presented in the Bristol Bay Cooperative Management Plan (BBCMP).

### Alternative C Management Intent

In Table 24 on page 117, the following statement is made: "Fish and Wildlife are assured a moderate level of protection under Alternative C." Considering that the refuge was created for its outstanding fish and wildlife resource values, continued subsistence lifestyles, and maintenance of water resources, the level of protection must be sufficient to prevent any significant impact to these resources. We question whether the term "moderate protection" adequately reflects the degree of protection contemplated.

Alternative C should continue to maintain the opportunity for oil and gas exploration and leasing (consistent with BBCMP), however, there should be greater emphasis on better maintenance and protection of primary refuge values. For example, given the speculative nature of oil and gas development, it does not seem appropriate to "discourage" recreational access or public facilities throughout the "Intensive Management" area (p. 61). Any limitation of this nature should be site specific.

An additional concern over this alternative can be found in the discussion of caribou on pp. 109-111. Because the entire "Intensive Management" area is key winter habitat for caribou, we believe that the impacts on wintering caribou have been underestimated in the event that commercial oil fields are developed.

### Enhanced Public Use Management Area

The "Enhanced Public Use" management category consists of one 300-acre site which may not be needed. That particular area already seems to have adequate public access by boat up the Egegik River, floatplane in the river lagoon, and wheelplane at sand blowouts on the southside of the river. Page 92 notes that the proposed enhancement site might include "campsites with tent pads and fire rings, trails, picnic tables, shelters, boat docks, and visitor interpretive displays." We do not object to such development, however, we question the need for these facilities in the next 10 years. We also suggest that adjacent state and private lands be considered if such recreational facilities are determined to be necessary.

### Cooperative Management Area

We request that this management category be renamed and the narrative describing it substantially rewritten. As currently written on p. 72, it implies that F&WS/State cooperative management is only applicable on those areas which are state controlled. We suggest that the category be changed to "State waters," and that the narrative indicate that F&WS will seek cooperation with the State including Alaska Department of Fish and Game (ADF&G), Department of Natural Resources and Department of Environmental Conservation so that the waters will be managed in a manner compatible with refuge purposes. It is also important to recognize that the State already has some existing management authority and cooperative agreements on refuge lands.

The revision of this narrative should note that maintenance of "existing natural fish and wildlife populations" will not automatically avoid the need to enhance the lake fishery. However, future cooperative agreements which take into account harvests on these populations when they are outside refuge boundaries will assist in minimizing the need for enhancement activities.

#### Fisheries Restoration

The State is concerned that a full range of fisheries restoration techniques will not be allowed on the refuge. Becharof Lake is Alaska's second largest lake and supports a significant commercial salmon fishery. From an economic perspective, it has in the past and continues to provide many fishery-related dollars in both the local and statewide economy. Due to natural phenomena such as earthquake, volcanic activity, and landslides, hatcheries or spawning/incubation channels might at some future date prove beneficial in restoring or maintaining existing salmon fisheries. The management plan as proposed on page 66, Table 18 would not allow such activities to occur. We request that these options not be administratively precluded.

As reflected in the State's Resource Management Recommendations, ADF&G, Fisheries Restoration Enhancement and Development Division has proposed a fish passage on Featherly Creek and an incubation facility and egg/fry plant for Becharof Lake. These and other possible habitat manipulations may be necessary in the future to maintain existing fisheries and their benefits to the people of Alaska through production from Becharof Lake. We request that these proposed projects be recognized by the plan.

#### Fisheries Enhancement

We request that this portion of the plan more accurately reflect the intent and mandates of the Alaska National Interest Lands Conservation Act (ANILCA) Section 304(e) which allows fisheries enhancement activities in refuges (page 65, Table 18). The plan should also recognize that Becharof Lake (both the lake bed and the water) is State-owned. Consequently, if F&WS desires to influence State fisheries management activities on Becharof Lake, it should not administratively prohibit some activities, but should seek cooperative management agreements as the plan suggests on page 72.

#### Big Creek Management Category

The map on page 91 shows a part of Big Creek in the "moderate management" category. We request that the entire riparian zone of the main channel be placed in the "minimal management" category. We are not inferring that this land be classified as "wilderness," but important wildlife values suggest that this area should be afforded the protection of the "minimum management" category. The fisheries values of Big Creek are well documented and this particular stretch of Big Creek also supports up to 50 moose in the late winter-early spring.

July 16, 1984

Conclusion


We appreciate the opportunity to comment on this draft. With resolution of the concerns we have identified in these comments, we believe F&WS will be able to submit a final plan which both protects the refuge resources and provides for the multiple uses of those resources. The attached list of specific comments provides additional technical information, corrections, and suggested modifications which are intended to improve the final Becharof NWR Comprehensive Conservation Plan.

The Division of Governmental Coordination has also completed the coastal consistency review of this plan. Based on our review, the Division agrees with your consistency determination that the plan is consistent with the Alaska Coastal Management Program.

Thank you for the opportunity to comment. If we can be of any assistance in clarifying our concerns, do not hesitate to contact our office.

Sincerely,

Robert L. Grogan  
Associate Director

  
By: Sally Gibert  
State CSU Coordinator

Attachment with specific comments

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

ATTACHMENT  
Specific Comments from the State of Alaska  
Becharof NWR Draft Comprehensive Conservation Plan  
July 16, 1984

- Page 1, col. 2, para. 1 - "Becharof contains approximately 1.5 million acres..." ANILCA Section 302(2)(A) says "approximately 1.2 million acres" this discrepancy should be clarified. Also, the statement "1.5 million acres (390,000 ha)" contains an incorrect conversion, it should be "(604,500 ha)."
- Page 3, col. 1, para. 1 - "...ANILCA expands the federal conservation system throughout the State (including refuges, parks, forests, wilderness areas, and rivers and trails)" (emphasis added). "Forests" are not considered Conservation System Units (CSU) in ANILCA Section 102(4), therefore, this statement should be corrected to read "forest monuments."
- Page 3, col. 2, para. 3 - The conversion is incorrect.
- Page 4, Vicinity Map - This map would be more useful to the reader if it included other CSU's in the vicinity.
- Page 9, Wilderness - It would seem more appropriate to cite ANILCA Section 1317 (general wilderness review) rather than Sec. 1310 (navigational aides). Is this citation correct?
- Page 11, col. 2, para. 3 - Local residents report that the first frost is no later than early September, and ponds will normally freeze by mid-October to early November.
- Page 15, col. 1, last para. - "Aniakchak Caldera National Monument and Preserve" should be "Aniakchak National Monument and Preserve."
- Page 15, Geothermal Occurrences - There are known hot springs at Gas Rocks in the vicinity of Mt. Peulik.
- Page 27, Table 3, Marine Aquatic - Waters below mean high tide are not in the refuge. To be accurate, the title of this table should be "Descriptions of ecosystems and subcomponents on Becharof Refuge and adjacent areas" (emphasis added).
- Page 30, Table 4 - Additional clarification is required for "total species" and "dependent species."
- Page 31, para. 3 - ADF&G recommends the use of a 20-year average escapement of 834,000 sockeye rather than the 695,000 figure used.
- Page 33, col. 2 - ADF&G has no reports of either Canada geese or common eiders nesting on Becharof NWR. They would appreciate any information of such sightings, if available.

- Page 34, Marine Birds - Due to the specificity of the population figures presented here, it would be appropriate to cite the data source.
- Page 36, Land Mammals - River otters and beaver should be added to the second sentence. It would also be appropriate to cite the "harvest" section of the plan at this point or mention harvest patterns comparable to the "Fish" section on page 31.
- Page 36, Brown (Grizzly) Bears - This section suggests that the entire refuge bear population (300) concentrates on Island Arm (also about 300); is this the case?
- This section, and others concerning wildlife could be improved further by presenting summary data on populations trends. ADF&G can provide these data if not available at F&WS.
- Page 37, Figure 22 - Based on field surveys and other observations, ADF&G biologists feel that the entire area north of Becharof Lake and east to the Kejulik River drainage should be shown as "key" winter habitat for caribou.
- Page 37 and 109, Caribou - Here and throughout the plan, the caribou herd should be called the Northern Alaska Peninsula herd. This herd ranges between Port Moller and the Naknek River and Lake and in June 1983 was censused at 18,000 animals.
- Page 38, Moose - We request that a range of numbers be used in presenting moose population data rather than to say "a few." There should also be mention of important moose habitat along the western border of Katmai National Park and along Big Creek.
- Page 40, Population Trends - The Bristol Bay Borough sponsored a census in 1981 which provides more accurate population figures: Naknek 369, King Salmon 374, and South Naknek 136.
- Page 40, Population Composition - Due to the specificity of these population figures, the source and methods used to determine the ethnic composition of the communities should be included.
- Page 41, col. 2. para. 1 - The sentences "This law has changed who commercially fishes for salmon. Future entrants will be mostly crew members on vessels of permit holders, and not vessel operators, unless new fisheries are developed" is misleading. Limited entry limits the number of units of gear fished, not who fishes. Furthermore, crew members already consider themselves to be commercial fishermen.
- Page 41, Table 6 - The "total" column should be underlined or spaced as in Table 7.

Page 42, col. 2, Way of Life - Subsistence Orientation - This section should avoid vague and value-laden terms such as "need" and "true dependence." The projected change that "fewer people will likely depend solely on traditional subsistence resources..." ignores the mixed subsistence/cash economy which has traditionally existed in the area and ANILCA's protection of this lifestyle. Hunting and fishing are essential to continuing this way of life, and the related cash flow is consistent with it.

Page 42, col. 3 - "Payne, 1981" should be "Payne and Associated, 1981."

Page 43, col. 1 - Kinship and Social Organization - In addition to Egegik residents, some residents of Naknek and South Naknek also have Scandanavian and Native ancestors. Some people in all three villages, as well as Natives living in King Salmon, also have Russian ancestors. Also, there have been interethnic marriages in communities besides Egegik.

Page 43, col. 3 - This paragraph reflects a false assumption that local residents follow either a subsistence way of life or participate in a cash economy. The reality of a mixed economy with a range of lifestyle and income patterns does not support the statement that "Those who rely on a subsistence economy, however, have difficulty adjusting to change."

Page 44, col. 2 - Local Economy - This section is confusing in that the first sentence refers to many "year-round" jobs. Then the discussion turns to "full-time" positions, including those in the fishing industry which are certainly seasonal, not "year-round."

Page 44, table 8 - There should be some distinction between the two rows labeled "Transportation." Also, a definition of the difference between "primary" and "secondary" fishing would be desirable.

Page 45, col. 1, para. 2 - This section should recognize that the economic effects of oil and gas development would depend in part on the location, type, and duration of such development, and may not be minor.

Page 45, table 10 - A definition of "personal income" is needed.

Page 47, table 11 - This table would be more helpful if it reflected averages (as on page 46) rather than a single year's data.

Page 47, Access and Transportation - Projected Changes - An airstrip at the outlet of the lake could affect local use patterns. Recent fieldwork revealed that spawned-out salmon and freshwater fish are taken out of this location.

Page 47, col. 3, Subsistence - Contrary to the statements in this section, ADF&G does not make "subsistence determinations." We suggest the following rewording of the first paragraph: "For purposes of resource allocations, the Alaska Board of Game has not found it necessary to make a distinction between subsistence and recreational hunting by local residents of King Salmon, Naknek, South Naknek, and Egegik. Regulations are currently broad enough to accommodate all uses. Therefore, for the purposes of this section, all local harvest of game will be considered subsistence."

In the second paragraph, the sentence "Many fishermen set up nets to the west of the refuge" would be more accurate if it stated "Subsistence gill nets are set in the vicinity of Egegik to the west of the refuge."

Page 48, col. 2, para. 1 - The sentence, "While no known subsistence fishing takes place in the refuge..." should be modified to note the reported use of spawned-out salmon from the "Rapids" area and local use of freshwater fish.

Page 48, table 12 - This table (and the corresponding "Public Use" discussion on pp. 46-47) inappropriately calculates total visitor use days by including each activity engaged (e.g., hunting, fishing, camping) during an outing as a separate use day. For instance, if a visitor went caribou hunting for three days and also fished, he would be credited with nine visitor-days. This system over emphasized activities that are incidental (like camping) to the primary purpose of the trip (usually hunting or fishing). In the Becharof NWR, this system tends to over-rate the relative significance of non-consumptive uses.

We note that the line for brown bear hunting in October 1981 should show some activity since there was a bear season during that time period.

Page 49, figure 24, - The wheelplane access on the southern side of the outlet of Becharof Lake should be shown, as well as land based vehicle use of the Jensen Airstrip Road and a wheelplane strip just west of Whale Mountain (approximately halfway between the "WP" and "FP" shown just north of the lake or due north of the "A" in Becharof Lake). There is also floatplane access at Ruth Lake and along the southwest border of the refuge.

Page 50, col. 1 - References to caribou and fish harvest "off-refuge" should read "outside refuge boundaries" to avoid the possible assumption that these hunting and fishing activities are taking place primarily on non-refuge lands within the refuge boundaries (i.e. state or private inholdings).

Page 50, para. 4 - "The traditional way of life" should read "traditional means of generating income" since this is not meant to refer to the overall concept of subsistence.



Page 50-57, "Areas Used for..." map series - We have significant reservations about the the accuracy and usefulness of these maps. The actual representation of this information tends to be subjective and open to interpretation. Intensity of use does not constitute importance. While these maps may be a useful planning tool they are potentially misleading and should be used only to identify general harvest level patterns.

The qualifying statements, such as the one on page 48 which relates to the maps on pages 50-51, should be expanded and located clearly on the same page with each map, along with a citation of the data source. It should be clear to the reader that these maps are not products of ADF&G.

Finally, to improve the accuracy of these maps, ADF&G has suggested the following specific modifications to the harvest level use patterns.

page 50: The area east of Big Creek, and the area east of Becharof Lake should show 11-20% of harvest.

page 51: Same as above.

page 54: The unshaded area along the eastern and southern side of the refuge should show 2-10% of harvest.

page 55: The unshaded area along the western side of Katmai National Park should show 11-20% of harvest.

page 56: The area along the western side of Katmai National Park should show at least 2-10% of harvest, as should the Big Creek and Salmon River corridors. (It also appears that this map may be incomplete and/or the legend categories in error).

page 57: Big Creek should show 11-20% of harvest and the Kejulik River should show at least 2-10% of harvest.

Page 52, col. 1, para. 1 - Reference to aircraft could imply a great deal of aircraft use by Egegik. There are only three locally owned planes and we believe few Egegik people access the refuge by air. We suggest the third sentence begin with "Aircraft are occasionally used..."

para. 2 - Duck and goose hunting also takes place in the fall.

Page 52, col. 2, para. 2 - This section states that, "Dramatic growth in the taking of salmon on the Naknek and Kvichak Rivers led to a recent closure of those rivers to all but local subsistence users." This should be clarified to reflect that it was not the growth of numbers of salmon harvested, but competition for fishing sites and general disruption of established patterns (brought by increasing numbers of nonlocal users) that brought about this regulation.

- Page 52, table 13 - The subsistence harvest data presented for moose and caribou are misleading, especially the degree of precision indicated. The residents of Egegik, South Naknek and King Salmon may take about 30 moose per year and in the neighborhood of 400 caribou.
- Page 53, col. 3 Hunting - It should be made clear that moose hunting season does not overlap with the bear season.
- Page 54, col. 1, para. 1 - This paragraph suggests that the moose and caribou seasons run from August-November. It should be clarified that moose season is only 10 days during September and a significant harvest of caribou occurs after November 1 when the limit increases to 4 caribou.
- It would also be appropriate to mention in this section that all brown bear hunting in the Naknek drainages (which includes Big Creek) is under a registration permit which prohibits the use of aircraft. Thus, much of the area adjacent to Katmai National Park is impractical to hunt legally.
- Page 58, Projected Changes - To supplement the statistical data in the first two paragraphs, ADF&G biologists note the following trends. Past hunting pressure would show a peak of activity from 1972-74 for all three big game species. Moose hunting effort declined steadily from then until 1981 and has since become relatively stable. Brown bear hunting effort dropped off significantly in 1974-1976 and has grown slowly since then. Caribou hunting effort dropped during the mid-70's and then grew rapidly in the late 1970's. It has become relatively stable over the past three years.
- Page 58, col. 3, Economic Uses - Again, it should be clarified that moose season does not overlap with bear season.
- Page 60, Land Status Map - Inclusion of land status adjacent to the refuge would be helpful and desirable.
- Page 62, table 17 - There is a discrepancy between this table and Table 18 on page 64 regarding wildlife stocking, predator control, pest control, disease prevention, and fire suppression. We also suggest expansion of the pest and disease control justifications.
- Pages 63 and 70 - Geophysical exploration as defined here (includes rock collecting and mapping) should be allowed in Becharof Lake.
- Page 65 - We would appreciate clarification of how ADF&G research studies would be affected by these management categories.
- Page 66, Subsistence Activities - ANILCA Title VIII does not limit subsistence activities to "personal" use of the resources.
- Page 67, Sport Fishing - Column VI should note that this activity is "permitted" rather than "not applicable" on Becharof Lake.

- Page 67, Recreational Trapping - Does "private use" indicate that pelts taken from the refuge cannot be sold?
- Page 68, Cabins - It is important to address existing cabins as well as new cabins.
- Page 69, Airplanes, Snowmobiles, Other Motorized - We request that F&WS express its management intent regarding access in cases other than "recreational" use (e.g., commercial, administrative, subsistence).
- Page 69, Other Motorized Vehicles - Column V would be clearer if it said "not permitted" rather than "not applicable."
- Page 71, Commercial Fishing - A refuge-wide prohibition of commercial fishing facilities is contrary to ANILCA Section 304(d). F&WS should clarify the basis for their apparent management decision in this matter.
- Page 72 - BBCMP does not prohibit oil and gas leasing of Becharof Lake; existing State Statutes (AS 34.05.140(F)) prohibits surface entry for oil and gas. The BBCMP only prohibits leasing in the tide and submerged lands within the Fisheries Reserve created by this statute.
- We also note that research studies by themselves do not generally constitute a management effort. Management usually entails the active use of information gained from these studies.
- Page 72, col. 2, para. 3 - This paragraph provides a good overview of the current ADF&G/F&WS relationship--the authors should be commended. To improve the paragraph, we suggest the statement on pg. 73, col. 3, para. 1 regarding Department of Interior policy be moved to this section.
- Page 73, col. 1, Wildlife Management - It should be clarified that the moose population is not healthy (in terms of recruitment) or stable. It would be highly desirable to stop the decline, and ADF&F encourages a cooperative research project with F&WS to evaluate this problem.
- Page 73, table 19 - To be consistent with F&WS intentions to delineate minimum wildlife population objectives for the refuge, we suggest inclusion of moose in this table. The table should also be annotated to reflect that migratory species such as caribou may not use the refuge in some years, thereby causing the refuge population to be below the "minimum population objective level."
- Page 75, col. 3, continuing para. - "ADF&G subsistence office" should be "ADF&G, Division of Subsistence."

- Page 77, Wilderness Suitability - We believe it necessary for F&WS to clarify how it intends to manage these "minimal management" lands if Congress decides not to classify them as wilderness; the plan is incomplete without addressing this possibility.
- Page 83, Alternative Maps - All four of the alternative maps lack the geographic detail necessary for an understanding of the impacts of each alternative. At a minimum, these maps should identify those landmarks referred to in text.
- Page 92 - ANILCA guarantees traditional access for inholders as well as subsistence users; this should be reflected in this section, and in the other alternatives as well.
- Page 102, Socioeconomic Effects of Alternative A - Under "Subsistence Way of Life," the reference to "political activity" should be clarified. The last sentence in this paragraph also allows the incorrect implication that subsistence is only a Native interest.
- Page 105, Socioeconomic Effects on Alternative B - This section predicts a 23% decline in local subsistence harvest. We cannot evaluate this estimate without information about how the "important" areas were identified. We would be interested to know if the harvest data used for this evaluation is for one year's hunting, two years, or a long term average.
- Page 107, figure 42 - The "12-inch pipeline" depicted on this map is referred to as a "20-inch pipeline" in the text--which is correct?
- Page 108, col 3, continuing para. - "80,000 to 100,000 yd<sup>3</sup>" converts to "61,000 to 76,500 m<sup>3</sup>" not "20,000-25,000m<sup>3</sup>" as noted here.
- Page 109, col, 3, Caribou - Although, it is unlikely that oil and gas development on the refuge will be substantial, F&WS should recognize the potential impacts on caribou. If the herd avoided a major portion of this area (as well as winter habitat on state lands which will probably be leased in sale 41) for the 20-25 year life expectancy of the field, we suspect there would be long term major impacts. Caribou have not crossed the Naknek River in modern times, and consequently, their winter range is more restricted than many other mainland herds. If excluded from a significant portion of their winter habitat on state and federal land, the impact would probably be more than the 5% reduction suggested. To avoid such a potential reduction, F&WS should monitor any potential oil and gas development.
- Page 111, Water Quality - Considering the importance of the fisheries resources within the refuge, any resource development involving activities such as gravel extraction and waste muds and fluids disposal could pose a detriment to water quality and to fisheries stocks. While opportunities considered for seismic exploration and recreational development be accommodated without major risk

to refuge resources, detailed planning for such activities needs to be addressed at the earliest opportunity to respond to facilities permitting and engineering plan review requirements. Also considering the remoteness of the management unit and the proximity to commercial navigation in Shelikof Straits, attention should be given in the management plan to addressing oil spill contingency response planning.

Page 112, col. 3, Subsistence Way of Life - In our view, the assumption that a 300 acre "enhanced public use" area will increase subsistence caribou harvest by 12% is incorrect. Current access in this region is adequate, especially in the winter when lakes are frozen and there is virtually unlimited aircraft access. However, should roads and airstrips associated with commercial oil/gas development be constructed in areas currently available for access, and public use of these areas is restricted, subsistence users will be forced to bypass traditional harvest areas. Development of the proposed "enhanced public use" area will not compensate for this reduced access. In addition to the restriction of available harvest areas, subsistence users will face increased competition for resources if personnel associated with oil/gas development also hunt in the area. (This argument applies also on pages 123 and 127).

Page 129, col. 2, State Agencies...This list should be modified to reflect CSU coordinator's distribution (see the Kenai NWR Plan).

Page 139, col 3, Mammals - "masked shrew" should not be italicized. We also suggest that arctic fox and marten be dropped from this list.

Page 148 - This reproduction of the F&WS/ADF&G Memorandum of Understanding should note that Mr. Skoog and Mr. Schreiner signed the document on 13 March 1982.