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December 23, 1986

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

Dear Mr. ^{BOK}Gilmore:

The State of Alaska has reviewed the draft **Nowitna** National Wildlife Refuge Comprehensive Conservation Plan/Environmental Impact Statement/Wilderness Review (CCP). This letter is submitted on behalf of state agencies and represents a consolidation of state concerns and comments.

Oil and Gas

The state has serious reservations about decisions in the CCP which appear to prematurely close a large portion of this refuge to oil and gas leasing. The state recognizes that ultimately there may be specific portions of the Nowitna Refuge on which oil and gas development activities and support facilities may be incompatible with the purposes of the refuge, however, the process that the FWS has attempted to follow to make this determination is deficient and clearly inconsistent with Section 1008 of ANILCA. The discussion which follows details the nature of our concerns.

ANILCA Section 1008(a) states an oil and gas leasing program shall be established on refuge lands except "where the Secretary determines, after having considered the national interest in producing oil and gas from such lands, that the exploration for and development of oil and gas would be incompatible with the purpose for which the unit was established." (Emphasis added.) No national interest determination has been made for the Nowitna Refuge. Furthermore, the state is not aware that a request for such a determination has been made to the Department of Energy. Yet implementation of this CCP would immediately preclude oil and gas development activities on 92% (1,712,400 acres) of the Nowitna Refuge through a core minimal management designation. The remaining 7% (142,400 acres) of the refuge is within the

congressionally designated Nowitna Wild River corridor. Therefore virtually the entire refuge (99%) would be closed to oil and gas leasing without the congressionally mandated national interest determination.

The state is also concerned about how information regarding oil and gas potential affects compatibility decisions. In the Togiak CCP, for example, it appears that oil and gas potential was a factor in determining that opportunities for leasing should not be foreclosed on the Nushagak Peninsula. This is inferred from the fact that the CCP does not indicate that refuge resources in this area would be affected differently than resources on other portions of the refuge. The only variable appears to be potential. Assuming that oil and gas potential is a contributing factor in determining where leasing may be permitted, then the FWS should base this decision on the best available information, including the Bureau of Land Management (BLM) Resource Assessment for this refuge. This assessment has not yet been initiated and therefore could not have been considered in preparation of the draft CCP.

The state is also concerned with the process used to identify core minimal management areas. The FWS defines core minimal management areas as those lands which are proposed for minimal management in all alternatives. This implies that within a theoretical full range of options, some lands would fall out as more sensitive than other. However, in the range of alternatives for the Nowitna Refuge there is only one alternative with a moderate or intensive management category. (Alternative D contains 1% proposed for moderate management.) Therefore there appears to have been little attempt to meaningfully differentiate more sensitive areas from the perspective of oil and gas development. Since there is little difference between the alternatives beyond the amount of proposed wilderness, the state does not consider that a full range of management alternatives has been presented for public review.

We are also concerned about the automatic determination in the CCP that, for core minimal management areas, the FWS "considers oil and gas development to be incompatible with the purposes for which the refuge was established." The draft CCP does not document the analysis process used to make this determination, not does it address stipulations or other mitigating measures that could effect compatibility.

Lastly, we note that the following aspects of the CCP currently appear to be ambiguous or need clarification:

- the use of the compatibility determination as it relates to oil and gas activities
- options for oil and gas leasing in minimal management areas

In view of the deficiencies identified above, the state urges the FWS to implement the following recommendations:

Since a national interest determination, BLM resource assessment, and more detailed documentation of the compatibility determination are lacking in the draft CCP, the FWS should suspend implementation of the oil and gas provision of the CCP and address these major decisions in a subsequent oil and gas plan. In order for the oil and gas plan to be completed in a timely manner, the FWS should immediately request that the Department of Energy prepare and submit a national interest determination. The FWS should also continue to pursue acquisition of resource data, including the BLM assessment. As part of the oil and gas plan, the FWS should also develop a compatibility analysis which explores the results of stipulations and mitigation techniques to minimize impacts on a site-specific basis.

The state also urges that the FWS clarify that any administrative decisions regarding opportunities for oil and gas leasing are subject to revision, and explain the revision process. It is important to recognize that current decisions could change based on new technologies, changes in national need and knowledge of oil and gas potential. We also request that the FWS clarify how these variables affect compatibility determinations.

Consistent with the current FWS Oil and Gas Policy (Appendix G) the CCP should also clarify that oil and gas leasing is not prohibited in minimal management areas. We suggest the following language for inclusion in Table 16 page 133: Oil and gas leasing "may be permitted subject to assessment of potential, national interest determination, and a site-specific compatibility determination." The current draft CCP gives little indication that non-core minimal management is significantly different from core minimal management.

Regardless of other changes made regarding oil and gas leasing, the CCP should also indicate that the existing Oil and Gas Policy is under scrutiny and an expanded statement will be available in the future. We urge that the review of the current policy also consider the concerns raised in this letter.

The state acknowledges that these recommendations represent a departure from Part IV (B) of the May, 1982 Memorandum of Understanding (MOU) between the Department of the Interior, the Department of Agriculture, and the State of Alaska. (Appendix H in the Selawik CCP.) This provision identifies Comprehensive Conservation Plans as the vehicle for determining if oil and gas leasing and development activities may be compatible with the purposes of Alaska refuges.

While the CCPs may be the logical vehicle for conducting this process, such decisions should not be made without the prerequisite information. The state presumes that the FWS would be reluctant to further delay the refuge planning process to pursue the needed data and analysis, hence our suggestion to defer subsequent oil and gas plans.

When the ANILCA 1008 Implementation Plan Project Group was disbanded by the Alaska Land Use Council in May 1985, such action was taken on the consensus assumption that the coordination process appeared to be working smoothly. According to the closing report of the Project Group, (see attached April 26, 1985 memo from Sal DeLeonardis) "Should problems surface at some future time, the Council may wish to establish a new project group with specific objectives identified for accomplishment."

Generic Issues

Since the draft plan was originally published in July of this year, there have been several revisions to language addressing water rights, ANCSA Section 17(b) easements, Revised Statutes (RS) 2477 rights-of-way, shorelands, tidelands, and submerged lands and management of the watercolumn. We presume that the current language contained in the Togiak final CCP, as modified by the draft Record of Decision (ROD), represents FWS' updated generic language for all plans. Therefore our comments regarding these topics in the draft Togiak ROD apply to this plan as well. (See letter from S. Gibert to R. Gilmore, dated 12/22/86.)

Consistent with previous comments, we request that the land status tables and map on pages 26-27 include a specific acreage figure for, and reference, state owned shorelands, tidelands and submerged lands.

Maintenance of Access Improvements

Consistent with previous comments, the state continues to believe that all existing roads, consistent with previous comments, we believe that all existing roads, trails, waterways, and landing strips should remain open. The ability to keep these facilities open is, however, dependent upon the accessibility of construction materials, particularly gravel. Without the use of gravel from a nearby source, or the ability to haul materials from source to project site, facilities such as an airstrip will eventually deteriorate and become extremely dangerous.

We recommend that the CCP acknowledge the need to maintain, reconstruct, or potentially relocate transportation facilities used by the several communities located in the refuge. Maintenance or reconstruction measures may be required to bring a facility up to federal/state design and safety standards, or to

meet the demand for use of that facility by the traveling public. The CCP should address the fact that gravel and other resources will be needed for public purposes to address the problem of facility deterioration. Adverse environmental impacts associated with facility maintenance can be mitigated through careful planning. Without provisions in the management guidelines ensuring that gravel and other materials can be obtained, the state, local communities and the refuge risk losing important improvements.

Hydroelectric Projects

Table 16 on page 134 specifically excludes full commercial development of hydroelectric projects under all management categories, regardless of the alternative. In an era of dwindling revenues, it is important to explore the potential for low cost energy resources which can provide alternatives to expensive diesel fuel. By precluding hydroelectric development in the Nowitna Refuge, FWS is closing the door to private communities and individuals who may wish to develop small-scale, hydroelectric projects for local use, as well as any state projects which might be considered. We feel that it would be short-sighted to exclude such potentially economic energy resources from future consideration for development.

The state recognizes that the Congressional Wild River designation prohibits hydroelectric development in the Nowitna river corridor, however there are numerous other potential opportunities that should not be precluded. We therefore recommend that, outside of the Wild River corridor, it would be more appropriate to provide for hydroelectric projects on a case-by-case basis where the environmental, economic, and social issues and alternatives can all be considered, rather than a blanket prohibition against a potentially desirable form of renewable energy generation.

Water Quality

Pages 154-156, Water Quality: We request that the Water Quality section on pages 154-156 be revised to more fully address water quality management concerns. As the Yukon River is used extensively for the transportation of materials and fuel, oil spill contingency planning should also be addressed in the CCP. An example of an appropriate discussion addressing water quality management and oil spill contingency planning may be found on page 59 of the final draft Kobuk Valley General Management Plan, (copy attached).

Similarly, the discussion of mining operations would benefit by a more thorough discussion of mining and mining management. We also request that the CCP include a general section concerning

water disposal. Examples of appropriate discussions from recent National Park Service General Management Plans regarding mining and waste disposal are also attached.

Proposed Management Directions

Page 119: Paragraph 5, line 8. We request that fish "enhancement" be included as a purpose for management.

Page 122-135: Table 16. This table needs to be revised to accurately reflect allowed activities for various management categories. "Designated Wilderness" should be "Proposed Wilderness" because currently there is no designated Wilderness in the Nowitna Refuge.

Page 122: Marking and Banding, Under column I. We request that "Service" be deleted to recognize activities by the Alaska Department of Fish and Game.

Pages 123-126: Column IV, Fish Passes, etc. The phrase "except permanent facilities for enhancement not permitted" should also be deleted.

Pages 123-127: Column V. The wording should be changed from "Same as (IV)" to "Same as (III)" because management of Wild Rivers is similar to that under minimal management (see page 121 of the CCP).

Page 127: Predator/Competator Control, Column IV. We request that the words "for restoration" be deleted. We recommend that the guidelines on page 138, paragraph 5 are adequate to protect the purposes of the refuge while maintaining management flexibility.

Page 127: Habitat Manipulation. Column III. Consistent with previous requests, we recommend changing "only prescribed burning permitted" to "Same as (I)."

Page 128: Fire Management. The Column description should be revised to include consistency with the regional interagency fire management plan.

Page 129: Subsistence. We recommend that the narrative be broadened to address nonprivate cabins. Motorized access for other subsistence uses should also be addressed.

Page 129-130: Access. We request that this section be revised to encompass all access. At present it does not address all nonsubsistence access because it limits motorized access to just use "for traditional activities." The revision should include

the uses for other activities that are allowed under Sections 811 and 1110.

Page 130: Snowmobiles, Column I. To be consistent with ANILCA, the wording "on or off designated trails" should be revised to read "on designated routes or areas."

Page 130: Other Motorized Vehicles. The wording "not permitted" under Columns III, IV and V is inconsistent with ANILCA Sections 811 and 110(b). Therefore, it should be changed to read "Same as (I)."

Page 130: Public Facilities. The topic "Temporary Facilities" should be added to the table under Public Uses and be described as follows: "Continued existing use and future establishment and use of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to the taking of fish and wildlife." The intent under all land management categories should read "Permitted so long as not detrimental to the unit's purposes." Further intent in the text of management plans should closely paraphrase the clear directions in ANILCA Section 1316, including a definition of "significant expansion that is cooperatively developed with DFG."

An additional topic, Wildlife and Fisheries Management and Facilities, should be included in the central table under Habitat/Population Management Activities and should be further discussed in the text.

Page 132: We request that boat launch sites be permitted on a case by case basis. It seems inconsistent to prohibit all permanent boat launch sites in minimal management areas when such facilities might have less impact than a proliferation of temporary sites.

Page 134: Transmission Lines/Pipelines. The columns II-V should be revised to reflect the provisions of Title XI of ANILCA.

Page 134: Guiding, etc. The narrative should be clarified to indicate whether cabins for operators are included in this discussion.

Page 135: Commercial Fishing. This section should be reworded to be consistent with ANILCA and with the results of the FWS and DFG Issues Resolution Forum on June 10, 1986. This comment also applies to the first paragraph of page 152.

Page 139: Paragraph 5. A statement should be added to indicate that enhancement opportunities will be allowed.

Page 139: Paragraph 5. We request that the following sentence be reworded: "Restoration efforts will only be initiated to maintain refuge stocks." Because restoration and maintenance are distinctly different management goals, the sentence needs clarification.

Page 142: Paragraph 3. Since airboats and air-cushion boats are defined as ORVs in FWS regulations for Alaska, and ANILCA 811 provides for such forms of access, we suggest that the last sentence be deleted.

Page 145: Paragraph 2. We request that this paragraph be expanded to note that the river will be managed consistent with the river management guidelines adopted by the Alaska Land Use Council entitled, "A Synopsis for Guiding Management of Wild, Scenic and Recreational Rivers in Alaska."

Page 153: Paragraph continued. We request that the following sentence be deleted; "No new permanent facilities will be permitted on the refuge." We note that the next sentence in the paragraph more accurately reflects the provisions of Section 304(d).

Page 160: Refuge Management Plans. We suggest that the sentence, "Public involvement may be required," be revised to read, "The public will be notified of subsequent planning efforts, and public meetings may be required." Such a revision is consistent with the CCP's introduction and the remainder of the paragraph. Also, the preceding sentence ending in "refuge management plans" should be modified to add "and refuge-specific regulations."

Page 166: Alternative B, paragraph 2, p. 169-170, Wilderness Review. We request revision of this paragraph to reflect that ANILCA makes exceptions for motorized access under Sections 110(b) and 811 and that continued use of motorized equipment is not restricted to subsistence users. Both the ANILCA legislative history and Wilderness Act provide for continued use of motorized equipment after an area has been designated as Wilderness. If FWS adopts a Wilderness proposal in the preferred alternative of the final CCP, it is important that all existing uses be recognized and permitted in the proposed legislation.

Page 168: Fish and wildlife management. We recommend that the proposed studies mentioned here be included in the preferred alternative.

Page 169: Commercial use management. We request that this section be revised to indicate that all users of chainsaws can continue these uses under the provisions of minimal management as well as provisions of any subsequent Wilderness designation.

Page 199: Other Alternatives. We suggest that the expanded fisheries management program proposed under Alternatives B, C, and D also be included under Alternative A subject to available funding from DFG or FWS.

Inclusion and Interpretation of Data

Page 14: Item 3. We request clarification that the problem is lack of detailed data rather than lack of any data. It would be desirable to obtain detailed and area-specific resource data which could be utilized to refine recommendations on fish and wildlife harvest levels and for habitat management. We also note that the FWS identifies a need for more information regarding moose and wolf populations and their interrelationships. Based on our knowledge of available literature, brown and black bear predation on moose should also be discussed.

Page 15: Item 4. We suggest that this paragraph be merged with item 3 regarding the need for additional fisheries information. Although intercept fishery harvest is identified as a problem, as we have noted in the past the state believes that there is insufficient data to draw that conclusion.

Page 22: Item 6, Fisheries. Consistent with our comment regarding page 14, we suggest that this also be revised to indicate that more detailed resource data are needed. This would better correspond with the section on pages 56-64 that more intensive surveys are in progress.

Page 28: Geology, paragraph 1. "Rock, cretaceous (75 to 135 million years ago" 75 should be corrected to 65.

Page 41: Geothermal section. The "Geothermal Resources Map of Alaska" (1983), produced by the Alaska Division of Geological and Geophysical Surveys, shows no geothermal occurrences within the refuge. It does show, however, that a basin which may be responsible for the Hornor, Melozi, Dulbai, and Little Melozitna geothermal occurrences may also underlie the northcentral portion of the refuge below Birches, the abandoned telegraph site noted on the "Subsistence" map on p. 75. There is a possibility of locating geothermal resources within this area. We request that the text be revised to acknowledge this.

Page 46: Paragraph 1. We suggest that the use of the headwaters area of the Little Mud River system by arctic grayling be verified. If they do use the area, then it is likely that they use parts of the main channel as a seasonal migrational corridor and could be added to the list of the species that "utilize this section." Also, if specific data are available, we suggest indicating the species of "whitefish" in paragraphs 2 and 3.

This would be consistent with the level of specificity in paragraph 1.

Pages 46 and 47: Water Quality. We recommend strengthening this section by replacing the qualitative limnological terms with actual measured values, if available. We question whether the surface waters were nearly neutral in areas underlain with limestone (p. 47, paragraph 1). We request that the dates and locations of measurements for heavy metal analysis be reported because varying seasonal discharge and configuration of tributaries may continue to marked seasonal and geographical variation.

Page 57: Paragraph 2. We suggest that the time of year of Alt's survey and the life stage that he sampled be indicated.

Pages 58, 60-62: Figures 15-18. We request that the "Fishery Resources" files which are listed as the source for each of the above figures be identified in the accompanying text.

Page 59: Paragraph 3. It would be valuable to indicate the time of year for the surveys by Alt (1984) and Glesne and Johnson (1984). The apparent inconsistency in data may be reconciled by examining the times of survey relative to the seasonal movement patterns.

Page 69: Bears. We suggest that more relevant studies be cited here regarding brown bear as a potential cause of moose and calf mortality. (Copies of these materials have been mailed to FWS under separate cover.)

Page 69: Paragraph 4. We suggest deletion of "large number of" and "from as far away as Fairbanks and Anchorage" because page 91 lists the total numbers, which include local residents, other Alaskans, and nonresidents. The total for recreational hunters is estimated to be 2000, which actually can be considered small for a 2 million-acre unit.

Pages 53-75: Figures 14-24. We request that the dates and times of year represented by the data be presented for each figure. The terms such as low, medium, and high (figures 19-23) should also be defined. In figure 23, the depiction of lynx does not seem to correspond to "the southcentral part" as referenced on page 74, paragraph 4, line 2. also, this paragraph states that lynx were "not abundant." This conflicts with areas of "high abundance" in Figure 23.

Page 74: Wolverines should also be addressed.

Page 74: Last paragraph: As previously mentioned, bears should also be addressed in discussions of predator-prey relationships.

Page 75: Figure 24. Statements that subsistence use areas are clearly mapped need to be reconciled with those indicating a lack of systematic study of local use patterns (text on pages 95, 99, 105, 107). Perhaps the figure caption needs to be more specific.

Page 84, Table 6: The population and economic data sources used in the plan are generally good. We suggest, however, using 1980 census data (below *) as a source for per capita income, rather than data from Louis Berger and Associates (page 84).

<u>Community</u>	<u>Per Capita Income in 1979 (dollars)</u>
Galena	\$9,169
Ruby	3,511
Tanana	5,378

(*Source: Alaska Department of Labor)

Page 88: Paragraph 1: For clarity and accuracy we suggest that trappers be placed in a separate section rather than under Subsistence. Paragraph 2: The specific location(s) of harvest should be indicated. It should also be indicated whether Geiger et al. (1982) reported numbers of sheefish.

Page 90: Paragraph 2, line 4. The percentages of moose hunters reported in this paragraph should be reconciled with those reported in Table 9. If the values in the text are mean values, they should also be reported in the table.

Page 91: We request that the specific game units or subunits be included in Table 9.

Page 92: Paragraph 4. We request that this paragraph include additional data and appropriate documentation. Also, we suggest revising "fur trapping" to "furbearer harvest."

Page 101: To be consistent with Appendices C and D, the word "Loche" should be replaced with the term "burbot."

Page 102: Table 12. We request that a footnote be added to indicate that this information is based on a limited survey. It does not appear to be based on a statewide trapper survey and may not include trapping conducted by other local residents.

Page 121: Cooperation and Coordination with other Government Agencies: The Department of Natural Resources is currently working on development of a land use plan for state lands in northwest Alaska, including lands adjacent to the Selawik Refuge. We request that the state planning effort be referenced in the

CCP. We suggest that this section may be an appropriate location for such a discussion.

Page 155: We request that the last paragraph be expanded to address how methods of habitat manipulation other than prescribed burning will affect water quality.

Page 184: Last paragraph. We request that this section be revised to reflect more relevant literature from the DFG Game Division regarding wolves and human disturbances. This information is being provided under separate cover.

Page 188: Scenario. Paragraph 1. Because the data on page 88 indicates that chum salmon are numerically the most important species, we suggest that chum salmon be included in line 11. We note that sheefish should also be included because they are identified in Alternative B and D, pages 200 and 207, respectively.

Page 191: Paragraph 2. We request that this section be revised to indicate that in addition to the proposed surveys of predators, it would be necessary to study moose mortality to fully assess predator pressure.

Page 205: Paragraph 4. We request a reference regarding the statement that the Nowitna River unit is "the most" productive waterfowl habitat.

Other Technical Comments

Page ix: First paragraph. We recommend including a sentence or two to alert the reader to the importance of the preferred alternative as the most likely management option.

Page x: Planning Process, last paragraph. We recommend rephrasing the reference to "potential problems" to "potential issues," in order to emphasize instead the cooperative implementation of state and federal management authorities.

Page xi: Implementation and Revision of the CCP. We request that this section also address state and public participation in other aspects of plan implementation, such as refuge-specific regulations. We suggest that this also be included on page 10, figure 4; and page 11, paragraph 3.

Page xii: In the last two "o"'s, the impression is created that the Nowitna Wild River will be managed differently than adjacent refuge lands. We understand that management will be essentially the same, regardless of this river corridor, and request clarification of this point in the narrative.

Page xiii: Environmental Consequences, last paragraph. The discussion of "improved surveys" - should be reworded to avoid the impression that there is a direct benefit to wildlife populations from surveys. Such benefits result instead from implementation of management actions that are based upon data from surveys. Suggested alternate wording: "minor benefit to management of . . ." See also the comparable section under each alternative (p.xiv -xvii). Similar references on page 219 should also be revised.

Page 5: Paragraph 5. We suggest that Section 602(40) of ANILCA be referenced in this discussion.

Page 7: Title VIII should also be referenced under Part D of Legal and Administrative Planning Requirements.

Page 9: We understand that the planning chart on this page has been revised since publication of this document. We presume that the updated chart will appear in the final plan.

Page 18: Inset paragraphs regarding trapping and wilderness. To make the statements consistent with the intent of ANILCA, we suggest these sections should be revised to include "does not restrict trapping or the use of cabins and traditional motorized access or equipment uses."

Page 20: Wilderness Designation. This section should be revised to reflect that Congress intended to protect existing uses, including mechanized equipment in Wilderness areas. This protection is not limited to subsistence users but is limited to areas where such uses occurred.

Page 21: Wilderness Designation. The statement, "Wilderness designation prohibits new roads other than for valid existing rights," should be revised to recognize transportation and utility corridor options provided by ANILCA Title XI. Also, the second sentence should be reworded to include "routes and areas of access."

Page 21: Item 4, Timber Harvest. We note that this section is out-of-date with current FWS regulations. We suggest that this point be clarified in the discussion.

Page 64: First three paragraphs. We suggest that these paragraphs would be more appropriately located on pages 88, 89, and 85, respectively.

Page 74: Paragraph 1: The term, "subsistence" should be deleted as a modifier of trapping since it is inappropriate to distinguish the types of trapping in this case.

Page 76: Paragraph continued. We request revision of this discussion of the NEPA process required to conduct predator control programs. The revision should eliminate inconsistencies with other references in the CCP (see page 138 for an accurate description).

Page 99: Subsistence. First sentence. Consistent with our comment for page 74, this statement should be revised to read "Trapping and subsistence hunting, fishing, and gathering."

Page 120-121: Each of the management classifications includes statements regarding traditional motorized access that we request be revised for consistency with ANILCA. We suggest the descriptions of access and activities be rephrased such as "traditional motorized access and other traditional activities are permitted."

Page 130: Public Uses. Consistent with previous comments, we recommend changing the term "recreation" to "activities" because trapping should not be designated as recreational.

Page 142: Paragraph 3. We request that a reference be provided for the FWS policy regarding airboats and air-cushion boats.

Page 148: Paragraph 2. The modifier "subsistence" with reference to trapping is inappropriate. We suggest, "Trapping, and recreational hunting and fishing . . ."

Page 149: Photo caption. The caption needs to be revised to avoid the implication that trapping cabins are exclusive use cabins. Such cabins may be available for general public use at other times of the year.

Page 150-151: We recommend an expansion of this discussion. The FWS should identify a maximum development scenario on the basis of the probable geology of the area. Guidelines should then be presented regarding the type of seismic activities that would be authorized. For example, would explosives be allowed; if so, would they be above the surface or drilled into the ground, and at what time of year? Would several geophysical operations be authorized, or would a single company be mandated to operate and share data? We believe that the discussion of mitigation should address these and similar questions to fully assess compatibility. At the minimum, future analysis should note that geophysical exploration programs would be state-of-the-art, and also contain objectives regarding the proper mitigation of impacts.

Page 161: Alternative A, paragraph 1. We suggest addition of a clarifying phrase such as "as modified by ANILCA" to follow "existing laws, executive orders, regulations, and policies."

Page 161: Fourth "o." Consistent with the previous comment for page 148, we suggest that the word "recreational" be deleted as a modifier of hunting, fishing, and trapping. This comment also applies to the fourth "o" on page 166.

Page 163: To reduce the confusion in this table it seems more appropriate to separate proposed Wilderness acreages as a distinct category rather than including these figures in acreages for minimal management.

Page 165: Paragraph 1. We request that a reference to the MOU in Appendix E be added to emphasize joint management of fish populations in the Nowitna River.

Page 185: Last paragraph. In the last sentence the word "subsistence" should not be used to modify trapping and should be deleted since there is not need to distinguish types of trapping in this case.

Page 193: Paragraph 2. For clarity we suggest that the portions of this paragraph pertaining to fish would be more appropriately included in the fisheries section on the previous page.

Page 198: Paragraph 4. We suggest a revision to this section to eliminate the impression that the opportunity to propose the Nowitna River unit to the National Wilderness Preservation System is "foregone" with completion of the CCP. Such proposals can be made at any time.

Page 214: Paragraph 4. Section 302(4)(B) should be corrected to Section 302(6)(B).

Page 275: We suggest placing the fish information after the wildlife information to avoid interruption of wildlife data presentation. We also note that the letter "N" as used in the table needs to be defined.


Mr. Robert Gilmore
Nowitna Draft CCP

December 23, 1986

On behalf of the State of Alaska, thank you for the opportunity to review this draft Comprehensive Conservation Plan for the Nowitna NWR. If we can be of any assistance in clarifying these comments, please contact this office. The state looks forward to review of the final CCP.

Sincerely,

Robert L. Grogan
Director



by Sally Gibert
State CSU Coordinator

cc: Senator Rick Halford, CACFA, Fairbanks
Commissioner Collinsworth, DFG, Juneau
Commissioner Gutierrez, DOT/PF, Juneau
Commissioner Smith, DCED, Juneau
Commissioner Sampson, Labor, Juneau
Acting Commissioner Kelton, DEC, Juneau
Acting Commissioner Arnold, DNR, Juneau
Mr. John Katz, Office of the Governor, Washington, D.C.
Mr. Rod Swope, Office of the Governor, Juneau

Title: State Comments to Nowitna Draft CCP

[1272] Mr. Mike Abbott, Resource Development Council, Anchorage
[1304] Ms. Susan Alexander, Anchorage
[1311] Mr. Bill Allen, Fairbanks
[120] The Honorable Robert Arnold, Department of Natural Resources, Juneau
[1312] Mr. James Barkeley, Esq., Anchorage
[1252] Mr. Michael Barton, U.S. Forest Service, Juneau
[1037] Ms. Joyce Beelman, Department of Environmental Conservation, Fairbanks
[1] Mr. Jay Bergstrand, Department of Transportation and Public Facilities, Anchorage
[469] Mr. Bob Butts, Department of Natural Resources, Juneau
[249] Mr. Norman A. Cohen, Department of Fish and Game, Juneau
[248] The Honorable Don Collinsworth, Department of Fish and Game, Juneau
[942] Ms. Tina Cuning, Department of Fish and Game, Nome
[943] Mr. Sal DeLeonardis, U.S. Department of Interior, Anchorage
[1373] Mr. Donald D'Onofrio, National Oceanic & Atmospheric Administration, Anchorage
[1292] Mr. Frederick O. Eastaugh, Juneau
[1293] Mr. Bart Englishoe, Anchorage
[1286] Mr. Boyd Evison, Anchorage National Park Service
[1294] Dr. Hugh B. Fate, Jr., Fairbanks
[203] Mr. Peter Freer, Department of Community and Regional Affairs, Juneau
[201] Mr. John Galea, Ketchikan
[1263] Mr. Joseph W. Geldhof, Department of Law, Juneau
[359] Ms. Lennie Gorsuch, Juneau Capitol Information Group
[303] Mr. Robert L. Grogan, Office of Management and Budget, Juneau
[1289] The Honorable Rocky Gutierrez, Dept. of Transportation & Public Facilities, Juneau
[944] Mr. Clay Hardy, U.S. Department of Interior, Anchorage
[1243] Mr. Robert D. Heath, Alaska Power Authority, Anchorage
[1244] Mr. Robert Henderson, Department of Public Safety, Anchorage
[1268] Mr. Mark Hickey, Juneau
[1247] Mr. Steve Hole, Department of Education, Anchorage
[1271] Ms. Sharon Jean, Alaska Land Use Advisors, Soldotna
[444] Mr. John Katz, Office of the Governor, Washington
[1288] The Honorable Keith Kelton, Department of Environmental Conservation, Juneau
[1297] Mr. Arthur Kennedy, Anchorage
[1298] Dr. John Choon Kim, School of Business & Pub. Affairs University of Alaska,
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[1270] Mr. Larry Kimball, Alaska Federation of Natives, Anchorage
[1275] Mr. Jim Kowalsky, Tanana Chiefs Conference, Fairbanks
[1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
[48] Ms. Janie Leask, Anchorage
[1258] Mr. Craig Lindh, Juneau Office of Management & Budget
[594] Mr. Hugh Malone, Commissioner, Department of Revenue, Juneau
[945] Ms. Janet McCabe, Anchorage
[946] Mr. Ron McCoy, Alaska Land Use Council, Anchorage
[1316] Mr. Barry Moorhead, Juneau Federal Highway Administration
[947] Mr. Ron Morris, U.S. Department of Interior, Anchorage
[499] Mr. Donald Nielsen, Anchorage
[1290] Ms. Debra Oylear, Division of Governmental Coordination, Anchorage
[595] Major General Edward G. Pagano, Department of Military Affairs, Anchorage
[1287] Mr. Michael J. Penfold, Anchorage Bureau of Land Management
[1277] Mr. Norman Piispanen, Dept. of Transportation & Public Facilities Northern Region
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- [501] Ms. Eileen Plate, Department of Labor, Juneau
- [1279] Mr. Gerald Rafson, Ak. Dept. of Transportation & Public Facilities, Fairbanks
- [1273] Mr. Randy Rogers, Northern Alaska Environmental Center, Fairbanks
- [1299] Mr. Wayne Ross, Anchorage
- [263] Ms. Laura Schroeder, Dillingham
- [1372] Ms. Marianne See, Department of Fish and Game Division of Habitat, Anchorage
- [87] Dr. Lidia Selkregg, Anchorage
- [1378] Mr. Thyas Shaub, Department of Commerce and Economic Dev., Juneau
- [948] Mr. Walt Sheridan, U. S. Forest Service, Juneau
- [233] Mr. Steve Sorensen, Juneau
- [60] Mr. Jim Stratton, Juneau
- [486] Mr. Robert I. Swetnam, Anchorage
- [1377] Mr. Len Vining, Anchorage
- [1242] Mr. Ike Waits, Department of Community & Regional Affairs, Anchorage
- [1239] Mr. Rob Walkinshaw, Department of Natural Resources, Anchorage
- [1371] The Honorable Kay Wallis, Fort Yukon
- [940] Mr. Vernon R. Wiggins, Anchorage
- [1240] Mr. Dan Wilkerson, Department of Environmental Conservation, Anchorage
- [1249] Mr. David Williams, Dept. of Health and Social Services, Juneau
- [1264] Ms. Vicki Williams, Department of Corrections, Anchorage
- [994] Mr. Geoff Wistler, Department of Commerce and Economic Development, Juneau