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December 23, 1986

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

Dear Mr. ^{Bob}Gilmore;

The State of Alaska has reviewed the draft Selawik 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.

Alaska Coastal Management Program

The state has completed an advisory coastal consistency review of the draft Selawik CCP. Based on the information presented in the draft document it appears that the plan will be consistent with the Alaska Coastal Management Program. A conclusive review of the U.S. Fish and Wildlife Service (FWS) determination will be made after the final CCP has been issued for public review.

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 Selawik 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 Selawik 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 89% (1,190,000 acres) of the Selawik Refuge through a core minimal management designation. The remaining 11% (240,000 acres) of the refuge is already designated as wilderness. Thus the entire refuge 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 has a further concern 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 others. However, in the range of alternatives for the Selawik Refuge there are no alternatives with any moderate or intensive management categories, thus all lands are, by definition, more sensitive. The only measurable difference between the alternatives is the amount of proposed wilderness. The state does not consider this to be a full range of management alternatives.

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 state acknowledges that the draft CCP does identify certain possible environmental effects of exploration and development (pages 175-179), however, we believe that the discussion is not adequate for the purposes of a compatibility determination. In particular, the scenario is based on inaccurate information and assumptions, does not address

key aspects of likely development activity, and fails to address site-specific stipulations. Specific examples of these concerns may be found under "Other Technical Comments."

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
- options for on-shore support facilities 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 provisions 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 expand the compatibility analysis to explore 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 I) 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 15 page 149: 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.

Regarding on-shore support facilities for off-shore oil development, we understand that current FWS policy is unclear

regarding whether or not such facilities are allowed in minimal management areas. We strongly urge that clear provision be made in the plan for the siting of such support facilities, subject to compatibility with refuge purposes.

Regardless of other changes made regarding oil and gas, 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). 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 to 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 Statute (RS) 2477 rights-of-way, shorelands, tidelands, 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 51-53 include a specific acreage

figure for, and reference, state owned shorelands, tidelands and submerged lands.

Transportation and Utility Corridors

The State wishes to emphasize that discussions and planning for transportation corridors should include simultaneous recognition of possible future utility needs. Whenever transportation corridors are established, FWS should be aware that acquisition of rights-of-way for accompanying utility corridors at the same time, over the same ground, is highly desirable. Simultaneous acquisition of the utility right-of-way will reduce bureaucratic paperwork and will minimize duplicative efforts by several agencies wanting to use the same ground. Using one right-of-way for a combined transportation and utility corridor will reduce the amount of space required by two independent rights-of-way.

As the cost of new or enlarged power facilities increases, it will make more sense to interconnect existing small diesel generation systems via transmission intertie, which will need to rely on utility corridors. Interconnecting two or more independent systems can reduce capital required for upgrade, as one system can then be retired to standby capacity. Consumers would have more reliable, better quality power available from a larger plant operated more efficiently than from two small, independent plants.

Maintenance of Access Improvements

Consistent with the state's policy as found on pages 43-44 of the CCP, the state continues to believe that a liberal approach be taken to ensuring public access, and that all existing roads, trails, waterways, and landing strips 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. 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.

The scenario presented on pages 180-185 of the CCP is for the environmental impacts associated with a major transportation corridor, and consequently an ANILCA Title XI action. While we appreciate this discussion, it would be beneficial for the CCP to also address the above-referenced maintenance of existing facilities. Such activities are at least as likely to occur on or near the refuge as the need for a new corridor. Adverse environmental impacts associated with facility maintenance can be mitigated through careful planning. For example, gravel can be obtained from an existing source pit, appropriate drainage structures can be installed, and ice roads can be constructed in winter months for the transportation of gravel. Most maintenance-type projects are relatively small, requiring fewer trucks and heavy machinery than major construction projects.

Proposed Management Directions

Page 42, last "o": We request clarification of fisheries management options discussed in this section. The following statement is inconsistent with Table 15 and other descriptions of fisheries management and research prohibitions that would accompany Wilderness designation. "Wilderness designation in and of itself does not affect fisheries management activities -- so long as the action is compatible with the purposes of the refuge it could be permitted in a Wilderness area." The text then quotes ANILCA Section 304(e) which provides for fisheries maintenance, enhancement, and rehabilitation where compatible with the purposes of the refuge. However, the next paragraph (page 43) includes administrative determinations to not permit permanent fisheries facilities in Wilderness areas. The text also implies that only restoration activities will be allowed.

The statement that "most fishery management actions... could be accomplished with temporary facilities" is not necessarily accurate. As discussed in our review of the Kodiak CCP, we believe that temporary facilities can, at times, be more environmentally disruptive than permanent structures. The most feasible, desirable, and environmentally sound management tool should be available to the FWS and the state in fulfilling fisheries management responsibilities. Limiting the management options to only temporary facilities is not consistent with these objectives or with Section 304(e).

The last sentence in this discussion needs clarification. "In addition, at this time no permanent facilities have been

proposed in the refuge." While no formal proposals have been advanced, we request that this discussion clarify that some possible fisheries research, restoration, maintenance, or enhancement sites were identified to FWS in the January 2, 1984 "State of Alaska Resource Management Recommendations for the Selawik Refuge" (page 13).

Page 20, last paragraph: If "major changes" in the plan are proposed, we request that the state and public be notified, particularly those who participated in the development of the CCP. We therefore suggest the following revision to the second sentence in this paragraph.

"If major changes are proposed, the public and state will be notified. Public meetings may be held, depending on the need and nature of the project . . ."

Page 141, Minimal Management (I): The summary of permitted access, activities, and facilities in this paragraph is not consistent with other sections of the CCP. For example, the provision that "traditional motorized access via snowmobiles and motorboats would be permitted" should also include aircraft. Another is that in Minimal Management, "no new permanent support facilities would be permitted for guiding/outfitting." We note that Congress intended that such facilities be permitted (SR 96-413, p. 308, 11/14/79).

Page 142, Table 15, Wildlife Stocking: The wording in column I should be modified to include "or rebuild stocks."

Page 142, Table 15: Regarding "Marking and Banding" in minimal management, we believe these activities should be conducted by DFG as well as by FWS. We suggest the paragraph begin with "Marking and banding" and that "Service" be deleted.

In the section on "Wildlife Habitat Manipulation," prescribed burning is the only allowed technique for habitat manipulation. We request that the FWS allow other techniques because it is essential that a full range of management tools be available to both the FWS and DFG. This would be consistent with the last sentence on page 159 which reads, "Determination of need for habitat manipulation would be made on a case by case basis." Without the flexibility to address site-specific situations, necessary habitat management programs would be hampered. (This comment also applies to the description of wilderness management on page 150.) The limitation to prescribed burning also may not be consistent with the regional interagency fire management plan. We suggest a revision of the description of the purpose for conducting habitat modification to include

restoration of habitat to mixed successional stages or restoration of seral plant communities.

The last two columns on each page of the table (except page 148) indicate that Wilderness Management and Wild River Management are identical, yet the ALUC guidelines for management of wild rivers in Alaska appear to be more closely related to Minimal Management than proposed Wilderness classifications. Furthermore, previous CCPs have stated that Wild River Management is similar to Minimal Management (e.g., see draft Nowitna Plan, page 121). We therefore request that Wild River Management and Wilderness Management be identified throughout the Table as separate categories, and that the management statements for the Wild River category be the same as those identified for Minimal Management.

Page 142, Public Facilities: "Temporary Facilities" should be added to the table under Public Facilities and 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 purpose." Further intent in the text of management plans should closely paraphrase the clear directions in ANILCA Section 1316, including definition of "significant expansion."

An additional topic, Wildlife and Fisheries Management and Facilities, should be included in the central table under Resource Management and should be further discussed in the table.

Page 143-145: We request that the last column on each page be revised to remove the prohibition of permanent facilities for enhancement activities, and to indicate that all columns are identical to column I. Also, in all locations where it appears in Table 15, we request that the following wording be deleted:

"... but permanent facilities for enhancement not permitted."

Page 144, Chemical Habitat Modification: We request that this section be revised to include the use of chemical habitat modification techniques for studies.

Page 145, Fire Suppression: This section needs clarification. The discussion implies that management will be consistent

with the refuge fire management plan rather than the regional interagency fire management plan. Prescribed burning is not mentioned in the text for land management classification, although page 142 indicates that it is allowed. Conversely, the minimum tool concept to protect private property is mentioned on page 145, yet it is missing from page 142.

Page 145, Physical Habitat Modification: We request that the minimal management provisions also apply to Wilderness and Wild River Management.

Page 146-147: The description of access under Subsistence Activities and Access headings can be confusing. We suggest all types of access be addressed under one heading with distinctions between subsistence, recreation, and Section 1110(b) access to inholdings as appropriate.

Page 146, Public Uses: It would be appropriate to address temporary facilities that are permitted by ANILCA Section 1316 within this section.

Page 146, Primitive Campgrounds: It is unclear whether "not provided" means the same as "not permitted". While we recognize that FWS may not see a need for primitive campgrounds at this time, we believe it would be more appropriate to state that they are "permitted" in the Table, and explain in the narrative that the FWS currently has no plans to provide such sites.

Page 149, Fly-in Tent Camps: In order to be consistent with the ANILCA legislative history, we request that this topic be broadened to include both temporary and permanent facilities.

Page 162, paragraph 3: We request that the statement that reads, "These populations ... will be managed to maintain existing levels" be modified to include restoration or other improvement activities, including restoration to previous levels. As written, it also conflicts with the subsequent discussion under Fish Population Objectives.

Page 164, (L) Fire Management: It is not clear whether the referenced Kobuk Fire Management Plan is also the regional interagency plan. We request that management provisions also be made for prescribed fires, mechanical manipulation, and other tools that may be necessary to achieve mixed successional stages of vegetation.

Page 167, paragraph 1: We request that this paragraph be revised to more fully express management intent that is consistent

with Section 811. As presently written it omits traditional activities involving aircraft, pack animals, or ORVs.

Page 169, (a) Recreation Management, paragraph 2: If, in the future, FWS feels that the refuge is suffering from "overcrowded conditions", we suggest that any subsequent management decisions be developed through detailed management plans that include state and public participation, such as the public use plan envisioned for the Togiak Refuge.

Page 170, (c) Cabin Management, paragraph 2: Public recreational use cabins also need to be addressed in this paragraph. It is also not clear whether the remainder of the paragraph addresses cabins used for trapping, hunting, and guiding, as well as other activities.

Within the public use section, we suggest that temporary facilities also be addressed as permitted by ANILCA Section 1316. We were unable to locate management intent regarding these facilities within the CCP.

Page 187, 14) Wild River Management: This section should be revised to clarify that the Wild and Scenic Rivers Act was modified by ANILCA. For example, Titles VIII and XI changed access provisions for wild river corridors. We also request that the guidelines adopted by the Alaska Land Use Council entitled, "A Synopsis for Guiding Management of Wild, Scenic, and Recreational River Areas in Alaska" be acknowledged in this discussion.

Page 194, Fish and Wildlife Management: We agree with the statement that "mechanical habitat manipulation would generally not occur." However, this appears to conflict with Table 15 on page 142 and 145 which only allows prescribed fires. As previously discussed, we request that Table 15 be modified to be consistent with the text on page 194.

Page 196, Public Use and Access Management: Consistent with our previous comments on the organization of subsistence and other access provisions in Table 15, we suggest that this discussion of motorized access also be revised to include access for subsistence purposes.

Page 200, Subsistence Management, paragraph 2: The state believes that the management objectives in this paragraph would be highly desirable regardless of the preferred alternative. We therefore suggest that this statement be added to page 194 and pages 205-6.

Inclusion and Interpretation of Data

We request that complete citations be indicated for data in Tables 6, 7, 9, and 10-14 and in Figures 8, 16-27, and 29-33. Once we know the origin of the data we may provide further comments.

We suggest modifying the maps in Figures 29-33 to include the total harvest area represented in the corresponding Tables 9-13. The areas currently depicted are misleading because they do not represent the total harvest area for the resources presented in the tables.

Page iii, iv; page 3, Planning Process, paragraph 4; and page 46, Lack Of Resource Data: In previous reviews of CCPs we have requested that the FWS delete references to "the lack of resource data" as a significant problem. In subsequent revisions of those CCPs, they have been revised to focus instead on the lack of detailed resource data. We urge that such language be adopted for all CCPs.

Consistent with this request, we suggest that the last sentence on page 46 be revised from "Adequate research and monitoring are required to record baseline conditions, determine management needs..." to "Additional research and monitoring are necessary to refine resource use information, baseline conditions, management needs, potential impacts..." This would eliminate the implication that current management is based on inadequate information.

Page 15, The Wild and Scenic Rivers Act: The last sentence on this page indicates that: "The river, including the river corridor designated in this plan, will be managed under the policies and guidelines developed in this document." We request that this paragraph also mention that numerous activities involving the river are also subject to management jurisdiction and policies of the state.

Page 22, Selawik River and its Tributaries: Although the CCP references the legal wild river designation and includes the detailed description in Appendix M, the actual location of the river boundaries is not clear. It would be desirable to include a map to show, for example, which of the 3 forks of the headwaters is the beginning of the wild river.

Page 42, first "o": We believe that historical use studies, documents, and local residents' statements would not support the claim that "the only use of ORVs within refuge boundaries occurs on Native lands." Because the text indicates that ORVs will be prohibited in Wilderness or on any other federal land unless used prior to ANILCA, the

above quoted statement implies that ORVs are prohibited on the refuge. We request that the discussion be clarified. For example, if the Native overselections revert to refuge and Wilderness designation, would ORV use continue to be allowed throughout present use areas?

Page 88, Figure 22: According to the state's data, there are additional areas that should be included under "Major Wintering Zone in Recent Years". Under separate cover we are sending a map showing approximate areas which the state believes are of equal significance to those noted in Figure 22. Additional information is available from the area game management biologist, David James, at 443-3420 or Box 686, Kotzebue, 99752-0686.

Page 92, last paragraph: David James is cited as the source for the information regarding wolf and wolverine levels. This information should be corrected to read that both populations have declined in the past but are not continuing to decline. Currently both populations are remaining at low levels.

Page 93, Figure 25: Based on the CCP narrative, an overlay for moose range in the upper Tagagawik River appears to be missing. The text describes maximum population and high-density areas in the Tagagawik and south boundary area but these are not reflected on the map.

Page 103, Population Patterns and page 103, Population Trends, paragraph 3: State data indicates uses of the refuge by additional communities than those listed in these two paragraphs. The upper Selawik area has been used by Huslia residents as a major caribou hunting area since 1975, and other people have flown to Ambler to hunt caribou. Some residents move back and forth between various communities but return to the same use areas each year. Galena residents have traditionally used the upper Tagagawik River area, as did Koyukuk residents from the 1920's through the 1940's.

Page 106 and 108, Population Tables: The state questions some of population figures in the draft CCP. Since the source, methods and assumptions are not provided, it is difficult to provide a meaningful review of the data. However, we specifically question the population projections on page 108 and the population estimates, especially for Kotzebue, on page 106.

Generally in population projections, the assumptions and methods will make one set consistently higher or lower than projections created with different assumptions and methods.

This is not the case with the table of projections shown on page 106. There is not a consistent relationship between the columns of projections.

Attached for your information are tables comparing the data shown in the Selawik Refuge CCP with 1984 population estimates prepared by the Alaska Department of Labor.

We note that the CCP predicts that while most villages will increase in population by 1990, Ambler, Buckland and Kobuk are predicted to lose population. We request that the CCP discuss these differing patterns in the text.

Page 145, Water Management: We request that the description address restoration and maintenance of waterfowl, furbearer, and other animal populations.

Page 170: Under the narrative for "Economic Use Management Directions," we request an additional section discussing the current status of commercial fishing activities and the conditions under which their potential expansion would be managed.

Page 194, Subsistence Management: We suggest that the FWS revise this discussion with information from the detailed Huslia study carried out by Jim Magdanz (Subsistence Division, Fairbanks, 452-1531).

Page 225, Table 20: We suggest this table be modified to address existing Wilderness as well as proposed Wilderness. For example, under Alternative A, the existing 11 percent designated Wilderness should be listed next to the 0 percent proposed. Under Alternatives B and C, the amount of Wilderness should be revised accordingly. As written, the table could give a misleading impression of the amount of refuge in Wilderness thus appearing to contradict Table 22 on page 228.

Page 226, Table 21: We note that the cumulative impacts under each alternative for the topics of "Fish," "Wildlife," "Habitat diversity," and "Water quality and quantity," are not consistent with the summaries in Table 20 under Alternatives B and C for the heading, "Fish and Wildlife." Information in the two tables should be reconciled. Pursuant to this revision, for "Habitat diversity" in Table 21, the state maintains, for example, that there is an impact from Wilderness designation if habitat manipulation cannot be used to reverse the effects of many years' of fire suppression.

Other Technical Comments

Page 1, last paragraph and Page 13, paragraph 1: The lead-in statements for the management purposes of the refuge should be replaced by the wording from ANILCA Section 302(7)(B), "The purposes for which the Selawik National Wildlife Refuge is established and shall be managed include..." (emphasis added).

Also the quoted paragraph (iv) needs to be corrected from "subparagraph" to "paragraph" on both pages.

Page 5, item 10: We suggest that this discussion of access should be revised to more fully address the methods, means, and users addressed under items 9 and 10 in the text (pages 165-170). Specifically, we request that the permitted use of other general motorized surface transportation methods, specific transportation methods and means to inholdings, and the administrative prohibition of roads and airstrips that are detailed on page 167 be listed in this summary.

Page 18, Figure 3: We request that the outline of the CCP process be revised to be consistent with text on page 4 (paragraph 1) and page ii (last paragraph) that describes necessary steps to fulfill the plan requirements of ANILCA Section 304(g). Previous CCPs have been similarly modified for consistency with ANILCA.

Page 32, continued paragraph: The statement, "Wilderness designation prohibits new roads other than for valid existing rights" should be clarified to reflect the provisions of ANILCA Title XI.

Page 35, Hot Springs and page 131, Recreational Uses: The descriptions of recreational use of the springs and the cabins may be inaccurate. It is our understanding that one cabin was built by Huslia residents and the other by Ambler residents. We also note that some residents of Galena use the area.

Page 36, continued paragraph: We note an apparent conflict between the statement, "Noorvik and Shungak residents were interested in constructing an airstrip for summer access to the hot springs" and the one on page 167, (10) Public Access Management Directions, paragraph 2, which states that "None of the alternatives would permit the development of roads or airstrips for public access. No groups have identified the need for these facilities."

Page 49, paragraph 4: The statement, "The use of motor vehicles will be limited to those types in use prior to December 2,

1980," is not consistent with ANILCA legislative history and should be revised. We suggest that this paragraph be modified to reflect technological advances in transportation methods.

The last sentence of this paragraph may be correct but also needs clarification regarding airboats and jetboats. The noise levels, impacts, and use of jetboats may be significantly less disruptive than airboats.

Page 133, paragraph 1: A summary of current hunting regulations is being provided under separate cover so that the season and bag limit information can be updated.

Page 141, Management Categories, paragraph 2: In the last sentence after the statement, "All references to access on the refuge are subject to the provisions of Section 1110(a)," we request that Sections 1110(b) and 811 also be added.

Page 141, Minimal Management (I), sentence 4: To avoid the implication that trapping is not recreational, we suggest revising this sentence as follows, ". . .for subsistence purposes, trapping, and recreational activities such as hunting and fishing."

Pages 153-154, 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. This section may be an appropriate location.

Page 172, Oil and Gas Scenario: As referenced in the introduction to this letter, the state has concerns regarding this discussion. Examples of these concerns are as follows:

- It is highly unlikely in this instance that a gas discovery east of Inland Lake would be produced if the only demand for the natural gas was in Kotzebue. The costs of producing and transporting the gas would be too high relative to the small demand.
- Even if a gas discovery were made and developed, the pipeline would likely be buried, not elevated.
- Even if an elevated pipeline from east of Inland Lake were constructed, measures would be taken to minimize potential impacts to fish, wildlife and their habitat.

- Based on information provided in the analysis, one cannot determine the impacts that oil and gas development in the Selawik Refuge would have on fish, wildlife and their habitat.
- Guidelines should be presented regarding the specific 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 a 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.

It is the state's belief that substantial revisions to this analysis are warranted. State agency personnel are available to meet with you or your staff to discuss the analysis and to offer additional recommendations for improvements, if so desired.

Page 192, Alternative A: In the last paragraph, we question the phrase "least protection." In the state's view, the other alternatives offer more restrictions on management options for maintaining the natural diversity of populations and habitat.

Page 203 and 207, Public Use and Access Management, line 4: We request revision of the third sentence to eliminate the impression that motorized access to inholdings will be prohibited.

Page 219, continued paragraph: We question the assumption in the last two sentences. The state believes that Wilderness designation can affect fish and wildlife resources through restricted options for management. Also, public use and access may be affected by additional restrictions regarding access methods, temporary facilities, and cabins.

Page 220, Impacts on other resource values: As noted above, this discussion should be revised to describe specific impacts of designated Wilderness on the management of fish and wildlife resources.

Page 223, paragraph 1: We request that this discussion be revised to avoid the implication that minimal management

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does not offer similar "long term protection" as designated Wilderness.


Page 224, Evaluation Criteria, paragraph 5: We request revision of the statement that reads, "any possible habitat alteration would probably be the result of wildfire," to more clearly recognize other necessary management tools as approved on a case-by-case basis, for example, "most habitat alternation will likely result from wildfire."

Page 224, Paragraph 6: This paragraph needs to be revised to eliminate the impression that there will be no impacts on recreational uses under any alternative. There would be an effect, for example, if cabins were eliminated under one alternative.

On behalf of the State of Alaska, thank you for the opportunity to review this draft Comprehensive Conservation Plan for the Selawik 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 Gilbert
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

Attachments



United States Department of the Interior

IN REPLY REFER TO

BUREAU OF LAND MANAGEMENT

1730 (910)

Alaska State Office
701 C Street, Box 13
Anchorage, Alaska 99513

APR 26 1985

Memorandum

To: ALUC Staff Committee

From: Sal DeLeonardis, Staff Committee ad hoc group member *SD*

Subject: 1008 Implementation Plan Project Group

In May 1982, Council approved the formation of a project group to prepare an implementation plan for the Memo of Understanding (MOU) concerning ANILCA Section 1008 planning studies, and subsequent oil and gas leasing, and other land disposals. The project group was also charged with the responsibility to determine if supplemental agreements to the master MOU were necessary to assure or simplify coordination and to prepare draft supplemental agreements for Council consideration if such were deemed necessary or appropriate.

Because of internal agency personnel changes and reorganizations, the project group has been relatively inactive in pursuing the Council's goals. Nevertheless, the Bureau of Land Management has proceeded to complete five separate ANILCA 1008 studies encompassing approximately 14.1 million acres. Of the total acreage studied, about 7.7 million acres of public lands have been opened to leasing under the Mineral Leasing Laws by the Secretary of Interior. Several areas were also made available for disposal under the headquarters, homesite, and trade and manufacturing site laws.

The project group members are in agreement that the coordination process established in the master MOU appears to be working smoothly, given the experience of the five already completed studies. The project group members believe that if the agencies involved in future studies continue to adhere to the coordinating mechanisms and processes established in the master agreement, no supplemental agreements will be necessary.

With no apparent need for supplemental agreements and the past experience of trouble-free completion of the five plans to date, the project group feels that further action is neither necessary nor warranted. The project group recommends that the Council find that there is no further need for the group. Should problems surface at some future time, the Council may wish to establish a new project group with specific objectives identified for accomplishment.

Title: State Comments to Selawik Draft CCP

- [1389] NANA Regional Corporation , Anchorage
- [1272] Mr. Mike Abbott, Resource Development Council, Anchorage
- [1075] The Honorable Albert P. Adams, Kotzebue
- [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
- [1118] The Honorable Frank R. Ferguson, Kotzebue
- [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, Anchorage
- [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
- [182] Ms. Jan Mills, Office of Management and Budget, Juneau
- [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

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- [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 Planning, Fairbanks
- [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. Thyes 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