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June 9, 1986

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

Dear Mr. Gilmore:

The State of Alaska has reviewed the draft Kanuti National Wildlife Refuge (NWR) Comprehensive Conservation Plan/Environmental Impact Statement/Wilderness Review (CCP). This letter is submitted on behalf of state agencies and represents a consolidation of department concerns and comments. Our comments primarily address fish and wildlife management, transportation and access, navigability, management of watercolumns, cooperative agreements, and water rights. If the state's concerns as noted in this letter are adequately addressed in the final CCP, we believe that the preferred alternative (C) is an appropriate management strategy for the Kanuti NWR.

FISH AND WILDLIFE MANAGEMENT

To be consistent with one of the refuge's key purposes: "to conserve fish and wildlife populations and habitats in their natural diversity", we believe that the FWS and the Alaska Department of Fish and Game (ADF&G) should be able to conduct any necessary, biologically sound, and mutually acceptable method of maintenance or improvement of fish and wildlife populations, regardless of which alternative is selected. These include not only those activities currently listed in Tables 14 and 15 and Appendix D of the CCP, but additional methods which are not addressed. This flexibility is particularly appropriate when considering the large gaps in fish and wildlife data that exist and that are described on pages 13 and 127-129 of the CCP. Imposition of restrictions on potential management tools at this point in time would thus appear premature. These restrictions may also be inconsistent with FWS' stated management priority of restoring fisheries populations on the refuge.

The CCP currently proposes to disallow permanent fish hatcheries, physical manipulation of fish habitat and physical manipulation of wildlife habitat under one or more of the land management categories. We believe that these are valid management activities which should not be precluded during this stage of

management planning. We do recognize, however, that it may be appropriate to include a provision in the CCP that these activities will be generally discouraged and only be permitted on a case-by-case basis, subject to a cooperative FWS and ADF&G determination of their acceptability.

A greater effort should be made to stress cooperative planning, research, and management efforts between the FWS and the ADF&G. Although this is described on page 123 and mentioned in other locations, it should be emphasized and reiterated as appropriate in portions of the CCP that address fisheries- and wildlife-related management decisions and activities. Instead, we find inconsistent acknowledgement of the closely interrelated roles of the FWS and the ADF&G, as noted in the page-specific comments that follow.

We are concerned that the CCP does not adequately identify and describe a resolution of the public use Potential Problem 1 described on page 12. We request that the CCP identify a program to achieve public cooperation and education in adhering to resource harvest regulations on the refuge. A commitment to improved enforcement, education, and the achievement of local support to reduce and eventually prevent the problems of illegal harvest should be included.

ACCESS AND TRANSPORTATION

We recommend that the FWS make the following revisions to the portions of the plan that address transportation and access. These proposed additions are to help clarify the issues of traditional access, Revised Statute (RS) 2477 rights-of-way and Alaska Native Claims Settlement Act (ANCSA) 17(b) easements. We recognize that the CCP has already incorporated some of our suggestions; however, the plan as currently written still contains some ambiguity on these issues. Most of the information requested below addresses concerns which we have with all of the Alaska National Interest Lands Conservation Act (ANILCA) plans for the National Park and Wildlife Refuge Systems in Alaska.

General Organization of Access Issues

The sections on access and transportation in the Affected Environment chapter should include a more detailed summary of the existing roads, trails, airstrips and waters used at one time or another for transportation in the refuge, including a brief discussion about the historical use, current use and management status of each. The information in this section should include, but not be limited to, 17(b) easements and RS 2477 rights-of-way, as noted in our page-specific comments. The Management Alternatives chapter should also address 17(b) easements, RS 2477 rights-of-way and non-exclusive use easements.

If the FWS cannot at this time explain in detail how it intends to address each RS 2477 right-of-way and 17(b) easement, the CCP

should refer to a process that the FWS will use to determine how 17(b) easements and RS 2477 rights-of-way will be addressed in the future in more specific terms. The current discussion in the CCP should confirm that the state and other interested parties will be involved in the development of this process.

ANCSA 17(b) Easements

The Affected Environment section of the CCP should include a discussion of ANCSA 17(b) easements of the ANCSA and a description of the easement types and uses for which each easement was designated. A list of all ANCSA 17(b) easements within the refuge boundary or on adjacent lands that terminate at the refuge boundary should also be included. A complete list and additional information about these easements may be obtained from the Bureau of Land Management (BLM) or an affected ANCSA corporation. We also suggest referencing the section of the CCP which will be addressing management of these easements.

The section on 17(b) easements in the Management Alternatives chapter should reference the list of easements in the Affected Environment chapter of the CCP, as described above. It should then indicate the FWS management intent for these easements. The discussion should also explain what modifications to the terms of conveyance, if any, FWS intends to propose for these easements. If no modifications are intended, the plan should state that policy for refuge management does not apply to 17(b) easements, and that all uses that are authorized in the conveyance document are allowed. This would serve as interim policy guidance to refuge managers until final policy is developed.

RS 2477 Rights-of-Way

A discussion of RS 2477 in the Affected Environment chapter should briefly describe the nature of these rights-of-way in the NWR. The current and historical use and the management status of each should be described. The section should also include a reference to the section of the CCP where FWS addresses RS 2477 management concerns. The Management Alternatives chapter should similarly reference the rights-of-way listed under Affected Environment and address management intent.

Because it is important that the FWS recognize that valid RS 2477 rights-of-way may exist within national wildlife refuges, the state has suggested in the past that the CCPs include maps of possible RS 2477 rights-of-way (ROWS). Since our recommendation last summer, it has become clear that private landowners are concerned that the depiction of possible RS 2477 ROWs in the CCPs may lead to unauthorized use of adjacent private land or inholdings. Furthermore, since the CCPs acknowledge that the units are subject to valid existing rights, including RS 2477 ROWs, and the state has provided information to FWS concerning possible routes, including their location, the state believes

that it is no longer necessary to include such maps in the CCPs. Rather, the state recommends that these maps be kept on file in the FWS office and be available for public review. Additionally, the state recommends that each CCP include a statement that additional RS 2477 ROW information is available from the FWS regional office or the State of Alaska.

Even though we feel it is no longer necessary to include maps of possible RS 2477 ROWs in the CCPs, we reiterate our request that all CCPs continue to acknowledge valid existing rights. Therefore, we request that the language on page 125 be replaced with the following:

RS 2477 (formally codified as 43 U.S.C. 932; enacted in 1866) provides that: "The rights-of-way for the construction of highways over public lands, not reserved for public uses, is hereby granted." The act was repealed by P.L. 94-579 as of October 21, 1976, subject to valid existing claims.

The Kanuti National Wildlife Refuge is subject to valid existing rights, including rights-of-way established under RS 2477. The validity of these rights-of-way will be determined on a case-by-case basis. The following list identifies rights-of-way that the state contends may be valid under RS 2477:

(List of potential RS 2477 ROWs)

A map of these possible RS 2477 rights-of-way has been provided by the state and is on file at the refuge manager's office and the regional office. This list and map are not necessarily all inclusive. Private parties or the State of Alaska may identify and seek recognition of additional RS 2477 rights-of-way within the Kanuti National Wildlife Refuge. Supporting material regarding potential rights-of-way identified by the state may be obtained through the Alaska Department of Transportation and Public Facilities or the Alaska Department of Natural Resources.

Identification of potential rights-of-way on the list and map does not establish the validity of these RS 2477 rights-of-way and does not necessarily provide the public the right to travel over them.

NAVIGABILITY

The section of the Management Alternatives chapter titled Navigable Rivers on page 137 should be replaced with the following paragraph:

At the time of statehood, the state received ownership of the beds of navigable waters to the "ordinary high water

mark." At present, the (name of waterways) have been determined navigable.

The FWS will seek cooperative agreements with the state concerning the management of submerged lands under navigable waters. FWS will make requests for the use of these lands to the appropriate state agencies.

Page 24 - Table 1 should include the acreage of submerged lands beneath navigable waters that are in state ownership. It should also include a footnote that acknowledges the unresolved navigability status of many of the waterbodies in the refuge.

Page 25, Land Status Map - Rivers within the refuge that have been determined to be navigable should be identified. Additionally, the legend to the map should identify the uncertain status of lands in other drainages. At a minimum, a footnote should be included in the legend of the map mentioning the possibility that other rivers in the refuge may also be determined to be navigable.

MANAGEMENT OF WATERCOLUMNS

The FWS should include a section on page 137 titled "Management of Watercolumns." The discussion should acknowledge that watercolumns remain subject to management authority by the state, although the state may choose to cooperatively manage such areas with the FWS on a case-by-case basis.

Additionally, the section titled "motorboats" on page 112 and 118 needs to be clarified. The management of these uses may require cooperative management agreements with the state. This needs to be acknowledged in the discussion about these uses.

COOPERATIVE AGREEMENTS

The section on page 125 regarding "Cooperation with other Government Agencies" should address RS 2477 rights-of-way, navigable rivers, and tide and submerged lands as topics where future cooperative management agreements may be appropriate.

WATER RIGHTS

Federal reserved water rights are created either expressly or by implication when federal lands are withdrawn from entry (by Congress or other lawful means) for federal use. It is the state's position that federal water rights, both instream and out-of-stream, are either generally or specifically reserved for the primary purposes of the reservation. Characteristics of a federal reserved water rights include:

1. it may be created without actual diversion or beneficial use,

2. it is not lost by non-use,
3. its priority date is from the date the land is withdrawn for the primary purpose(s) involved,
4. it is the right to the minimum amount of water reasonably necessary to satisfy both existing and reasonable foreseeable future uses of water for the primary purpose(s) for which the land is withdrawn. Water for secondary purposes must be obtained under state law, AS 46.15.

Discussion at the March 1985 meeting of the Alaska Water Resources Board, emphasized the importance of two aspects of federal reserved water rights. First, they are recognized only for the primary purposes for which the land was withdrawn, and second, they apply only to the minimum amount of water reasonably necessary to satisfy the primary purposes of the withdrawal. Legislation establishing the withdrawal of land is critical, because it establishes the priority date for the federal reserved water rights, and often expressly states the primary purposes of the withdrawal. All of these aspects of federal reserved water rights--the priority date, the primary purposes, and the minimum amount of water reasonably necessary to maintain the primary purposes--are important concepts that should be reflected in the CCP.

Page 135 - We suggest that the first paragraph (three lines) be replaced with the following:

"The water resources of the Kanuti National Wildlife Refuge will be managed to maintain the primary purposes for which the unit was established. The primary purposes of this NWR are _____, as cited in the following legislation establishing this national wildlife refuge (reference to legislation). Specific water resource requirements for the primary purposes of the refuge will be identified and the minimum amount of water reasonably necessary to maintain these purposes will be quantified in cooperation with the State of Alaska. Once federal reserved water rights have been quantified, the Fish and Wildlife Service will file this information with the state in accordance with state laws. Water for secondary purposes and all other uses within the NWR will be applied for under AS 46.15."

PAGE-SPECIFIC COMMENTS

Page x, PLANNING PROCESS, last paragraph and page 13 - Discussion of "intercept harvests" as a "potential problem" implies that commercial and other off-refuge harvests are a major management problem for the FWS. We request that the CCP clarify that the state manages the fisheries, regardless of type or location of harvest, for the health and maintenance of fish populations.

- Page xi, Implementation and Revision of the CCP - We request that this discussion address state and public participation in detailed management planning and other aspects of the CCPs implementation, such as refuge-specific regulations. Statements regarding state and public participation also are requested for page 8, paragraph 9; page 9, Figure 3; and page 10, Figure 4.
- Page xi-xii - We request that items 2, 3, 5 and 6 reflect intent to coordinate with ADF&G management programs.
- Page 4 - We recommend showing Alatna, Allakaket, Bettles, and Evansville as separate communities to avoid confusion.
- Page 12, Item 2 - We request clarification of which peregrine is being referenced. The American is "endangered" and the Arctic is "threatened." Management decisions may depend upon which peregrine is present.
- Page 12, Item 4 - The discussion of subsistence as a "special value" needs clarification. We suggest that the value being described is the cultural value of the subsistence way-of-life. We recommend changing the section heading accordingly.
- Page 13 - We request that this section be rewritten to avoid the implication that the ADF&G recommends harvest levels and regulates human uses in an unsound manner.

Regarding information on subsistence uses, we note the importance of not restricting subsistence use studies to the refuge itself because customary and traditional uses by local residents occur both within and outside of the refuge. We also urge the FWS to carefully consider the impact of conducting additional subsistence studies. Although more detailed and precise data are always desirable, efforts to obtain such detailed information should carefully consider local communities' willingness to actively participate in further data collection efforts.

- Page 13, Item 5, paragraph 2 - It appears that the first sentence is a misquote from ADF&G Informational Leaflet No. 239 published in 1984 entitled "Yukon River Fall Chum Salmon Biology and Stock Status" written by Lawrence S. Buklis and Louis H. Barton. However, this is not verifiable because the cited reference does not appear in the CCPs reference section. If the source is leaflet No. 239, then the sentence is misleading in the context presented. The information presented in the CCP should pertain to the Kanuti portion of the Yukon River drainage. The above-mentioned source pertains only to fall chum salmon and discusses escapements to the Sheenjek and Fishing Branch rivers in the Porcupine River system and to the Tanana River system. Information concerning the Koyukuk drainage is extremely limited in terms of fall chum salmon escapement estimates,

and it is not recommended that the FWS attempt to apply data from other portions of the Yukon River drainage to that portion found on the Kanuti NWR.

Page 13, 20,21, and 71 - Discussion on these pages should reflect the possible impacts, if any, on water quality within the refuge of potential mining on Doyon lands.

Pages 16-20, Wilderness Designations - Alaskan residents have expressed concerns that lands designated as wilderness in the future will eventually be directly or indirectly closed to consumptive uses of fish and wildlife resources. Policy regarding uses and activities in Alaskan wilderness areas and discussion of special provisions to be included in any potential legislative action should be clearly discussed in the CCP. (See the attached "NPS Wilderness Recommendation: The State of Alaska's Perspective.")

Page 18 - We request that this discussion of mechanized access reference ANILCA Section 811, in addition to 1110(a). Section 811 allows for "other means of surface transportation traditionally employed" for subsistence purposes. Similar recognition of Section 811 provisions should also be added on page 131 under Recreation and Access, page 132 paragraph 2, page 141 last sentence of Public use and access management, and page 147 Public use and access management.

Page 25 - Because the content of Figure 5 is subject to major change, we recommend adding a date to the map, specifying that land status designations are current as of January 1985, for instance. We appreciate the inclusion of the important information presented on this map.

Page 41, Paragraph 3 - Reference to the Dietrich Highway should be changed to the Dalton Highway.

Page 57, Bears - Residents of Allakaket and Alatna reported harvesting 21 black bear in 1982, while residents of Bettles and Evansville reported a total harvest of 5 black bears. The portion of these black bears taken within Kanuti NWR was not reported.

Page 58, top of page - The Marcotte and Haynes reference cited here is a 1985 (not 1984) publication; this citation also appears on pages 68, 72, 75-77, 88, 90-92, 94, and 193-194.

This reference indicates that beaver harvest levels were second only to marten, but it does not discuss the importance of beaver in the subsistence economy. The statement should be reworded unless data are available to substantiate the wording used.

Pages 61-65 - We request that mention be made of Lt. Henry T. Allen, who in 1885 made the first non-Native reconnaissance

of the Koyukuk River and mapped more than 500 miles of territory. Inclusion of references used in preparation of the text in this section would be useful. On page 62, we recommend noting that Figure 15 presents historical information. On page 64, the term "Christian era" is not generally used in discussions of archaeology of the New World.

Page 66 - We question the source of the listing of "five major forces affecting settlement patterns in the area."

Page 67, Table 4 - To make this report more current, we suggest using the following population estimates:

	<u>1984</u>
Alatna and Allakaket	175
Evansville and Bettles	92
Hughes	97
Galena	894

Page 67, Table 5 - It would be more accurate to use American Indian, Eskimo, and Aleut in the place of "Total Native." Table 5 requires three corrections to more accurately reflect statistics for Bettles and Evansville. Total population, according to the 1980 Census, should be 100; "Native" population should be 28; year round housing units occupied should be 32.

Page 67 - Table 5 indicates the "average family size" in Hughes as 9.2 persons. This appears to be in error when considering the total number of families given and total community population in 1980. In addition, on page 93, the CCP identifies 5.2 as the average family size in Hughes.

Page 68, Table 6 - These population projections may need to be re-evaluated in light of the 1984 population estimates.

Page 68, Table 7 - Current annual per capita income statistics in Table 7 do not match data from the 1980 Census. The following figures come from the 1980 Census:

	<u>Alatna and Allakaket</u>	<u>Evansville and Bettles*</u>	<u>Hughes</u>	<u>Galena</u>
1908 Annual Per Capita Income	\$2,965	\$8,783	\$3,423	\$9,169

*Bettles data suppressed due to confidentiality.

Page 68, Final paragraph - The second sentence is incorrect. Marcotte and Haynes (1985, page 21) state that 90 percent of household heads had some employment, not 90 percent of all

residents. The third sentence is also correspondingly incorrect.

Page 69, Final paragraph - We request clarification or deletion of the statement "their presence in the area may prove catalytic in the formation of local government." As the CCP notes, local governments are already present in the form of village and/or city councils.

Page 70, paragraph 3 - We request that the distinction between commercial and subsistence timber be made clear in this section.

Pages 72-73 - The discussion accompanying Tables 8 and 9 requires some clarification. We recommend noting the number of occupied households in each community and the number of households surveyed. Our assumption is that interviews were not done with 301 of 350 residents. In the final paragraph on page 72, spring waterfowl hunting should be addressed.

Footnote 2 of Table 9 cites the reference "Ancerhon 1982," which may be a typographical error as it is not included in the bibliography. Although we do not object to the total number of fish harvested being presented in Table 9, this figure could be misleading, given the varying weights and uses made of harvested fish.

Page 74, Paragraph 1 - In 1982, 78 percent (and not 90 percent) of the households in Allakaket, Alatna, and Hughes harvested moose. This information is reported in the Marcotte and Haynes (1985) reference on page 52. We again question the assumption that a direct association exists between "importance" of certain species and the levels at which they are harvested. Such a determination should be based on survey questions which directly ask for such information.

Page 75, Paragraph 1, Transportation - We request clarification of the statement that Bettles Airport is not as important as it once was.

Page 75, Paragraph 5 - The notation that the Galena runway is state-owned could be interpreted to mean that it is the only state-owned airport in the area. Actually all of the airports listed in this paragraph are state-owned and maintained.

Page 75, Last paragraph - We request that the relationship between Prospect and a possible future route to Ambler be clarified. Also, routes to Ambler and Sithylenkat would be new routes and not extensions of the Dalton Highway.

Pages 81-85, Figures 17-21 - We recommend adding the names of the communities whose use areas are depicted in these figures to the figure headings. The source(s) of

information presented in the figures also should be noted (e.g., What methodology was used? Are the data derived from interviews with all community households?). Does Figure 20 refer to the 1982-83 or the 1983-84 trapping season? We question how the "more important" waterfowl hunting areas were determined in Figure 19. We recommend that a qualifier be added to these maps, specifying that areas used for harvesting resources change over time and may occur in areas not used in 1983. Also, the dynamic aspect of subsistence use areas should be acknowledged in the text accompanying these maps.

Page 87, Paragraph 2 - We question whether 4.7 is the average size of families or households in Allakaket and Alatna.

Page 88, Paragraph 9 - We request deletion of "trapping" as a source of employment. Local trappers are not employed as trappers as would be the case in "commercial trapping" operations. Local trapping is an activity that yields a source of fresh meat and/or raw materials for making handicrafts and supplements the cash flow. Cash income derived from trapping is not substantial in these communities. We request that equivalent corrections in the discussion in the final paragraph on page 93.

Pages 90-91 - The CCP should note that Bettles recently gained status as an incorporated city. In addition, it should note that access to Bettles is provided seasonally by a winter road (trail) linked to the Dalton Highway.

Page 91, second to last paragraph - The Division of Aviation (Department of Public Works) no longer exists. It has been assimilated into the Department of Transportation and Public Facilities.

Page 94, paragraph 5 - The Koyukuk Controlled Use Area does not extend to the mouth of the Kanuti River; this error should be corrected.

Page 111 - Table 14 indicates that house log and firewood collection for subsistence purposes is not permitted under any of the management alternatives. This contradicts the discussion in the accompanying text on pages 109-110.

Page 112, Table 14 - We request that the provisions of ANILCA Title XI be noted under the Public Facilities section of this chart.

Page 114, Table 15, Marking and Banding - We request adding "ADF&G and" before "other scientific institutions." The described overall management of the species is a primary responsibility of ADF&G, which relies upon such specific data for management decisions. We request that the paragraph under the management categories should also state

"Service and ADF&G" in each location where "Service" is stated.

Page 115, Table 15 - Wildlife stocking may also be necessary to restore, rehabilitate, improve, or maintain native populations. Provisions for all related activities should be included.

Page 116, Table 15 - We oppose restrictions on management tools that may be necessary for fisheries management, such as permanent fish weirs and physical habitat manipulation. We request modification of the CCP to allow for these activities on a case-by-case basis subject to cooperative assessment and coordination.

Page 119, Table 15 - We request clarification of the statement that other motorized vehicles "are permitted only on designated trails." This statement includes airboats which are prohibited on refuge land in national regulations. Proposed Alaska regulations define airboats as off-road vehicles (ORV), which are provided for by ANILCA Section 811 for subsistence purposes. Accompanying regulations also permit use of ORVs on designated areas rather than just trails (as stated on page 129).

Pages 120-121, Table 15 - We request that the provisions of ANILCA Title XI be noted under Public Facilities, as they are under Access on pages 118 and 119.

Page 121, Table 15 - Under Airstrips, we request that the issue of maintenance be addressed.

Page 125, Paragraph 4 - This section should also state that possible RS 2477 rights-of-way, in addition to those shown in Appendix F, may exist in the refuge.

Page 127, Paragraph 1 - This discussion of species management plans does not adequately recognize existing ADF&G management plans, as well as FWS agreement to adopt state management plans whenever possible. If ADF&G management plans do not meet FWS budget or program requirements, cooperative efforts should be pursued to facilitate FWS meeting its requirements.

Paragraph 4: We request adding "in cooperation with ADF&G" after "will participate" and deletion of "with other agencies." No other agencies are responsible for the study and management of the Western Arctic caribou herd.

Page 127, Paragraph 2 - The statement that "possible coho salmon" are found on the Kanuti Refuge conflicts with statements on pages 99 and 101 to the effect that coho salmon are found on the refuge.

Page 127, Paragraph 4 - The statement that it has been 12 years since the Western Arctic caribou herd last migrated onto the refuge conflicts with the statement on page 99 indicating that it has been 15 years since the last migration.

Pages 128-130 - We compliment this discussion and particularly compliment the second paragraph on page 129. The ADF&G Division of Subsistence is prepared to assist the FWS with its data needs to the extent possible, given study priorities and staffing constraints.

Page 131, Wilderness - Future access needs should be considered prior to designation of wilderness areas. Improvement of access between Bettles/Evansville and Allakaket/Alatna or other private or state land should not be precluded by wilderness designation.

Page 131, Recreation and Access - The discussion in paragraph 1 could render the impression that certain transportation methods will be restricted or prohibited regardless of the input received at public hearings. We request its clarification.

Paragraph 5: We note that trapping is not a categorized use by either federal or state regulations. We request that the CCP remove all references to "recreational trapping."

Cabins: We request that cabin policies be clearly described.

We are unable to find any statements of management intent regarding temporary facilities. Policies regarding such facilities are not directly related to cabins, but for the benefit of the public should be discussed in a proximate location.

Page 135, Paragraph 2- We are unable to determine what criteria are being used for making compatibility determinations. Numerous discussions refer to uses or activities being subject to compatibility tests. In particular, we object to the determination that commercial fishing activities are incompatible uses of the refuge while ANILCA Section 304(d) allows such activities. We also note that contradictions exist between what is listed as incompatible on pages 116-124 and the list in paragraph 2 of this page.

Page 138, Refuge Administration and Facilities - It might be cost-efficient to include the state (e.g., the ADF&G) in the desired cooperative administrative facilities.

Pages 139 and 142, Fish and Wildlife Management - We request that these discussions be clarified to reflect that the ADF&G sets primary management directions for fish and wildlife populations, consistent with state law.

We also note that other sections of the CCP make reference to a primary management intent to restore or actively manage populations (e.g., page 174); however, this intent is excluded here.

Page 144, Paragraph 8 - Alternative C includes intent to restore fish and wildlife populations to historic levels. As previously requested, the ADF&G desires opportunities to cooperatively define historic levels in cooperation with the FWS. We request that this also be addressed in paragraph 3 on page 147.

Page 145, Fish and Wildlife Management - This discussion omits recognition of the state's management of fisheries and wildlife or cooperative state and FWS efforts, such as habitat assessment.

Paragraph 3: We request clarification that "maintenance of fish and wildlife populations" under Alternative C includes recognition of the cyclic nature of some species.

Page 147, paragraph 2 - We request recognition in the CCP that planned removal of beaver dams will include consultation with affected communities and/or local residents.

Page 148, Management Costs - We request discussion of the possibility that the biological activities described in pages 145-147 could be conducted more appropriately and efficiently through cooperative agreement, using existing ADF&G personnel.

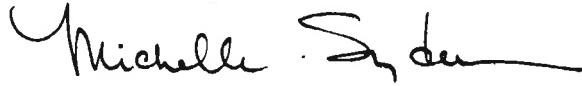
Page 149, Paragraph 2, last sentence - We request "Alaska Board of Game" be corrected to "Alaska Boards of Fisheries and Game."

Page 213, Summary of Permitted Management Activities. . . - As stated earlier, we believe prohibiting permanent fish weirs, permanent fish hatcheries, fish rearing ponds, and physical habitat manipulation in minimal management areas (71% of the refuge under the preferred alternative) is inappropriate. We request the CCP be amended to permit these management tools on a case-by-case basis, subject to cooperative agreement.

Page 217, Appendix F - We request that, in addition to trail location numbers, this appendix include a listing of the trails and available background information on each one. The appendix should also note that other possible RS 2477 rights-of-way may exist within the refuge.

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



Michelle Sydeman
CSU Coordinator

cc: Senator Rick Halford, CACFA, Fairbanks
Attorney General Brown, Law, Juneau
Commissioner Collinsworth, ADF&G
Commissioner Knapp, DOTPF, Juneau
Commissioner Lounsbury, DCED, Juneau
Commissioner Notti, DCRA, Juneau
Major General Pagano, DMVA, Anchorage
Commissioner Robison, Labor, Juneau
Commissioner Ross, DEC, Juneau
Commissioner Sundberg, DPS, Juneau
Commissioner Wunnicke, DNR, Juneau
Robert Grogan, OMB/DGC, Juneau
John Katz, Office of the Governor, Washington, D.C.
Molly McCammon, Office of the Governor, Juneau