

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR


DIVISION OF GOVERNMENTAL COORDINATION

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December 4, 1987

Ms. Leslie Kerr  
Planning Team Leader  
U.S. Fish and Wildlife Service  
1011 E. Tudor Road  
Anchorage, AK 99503

Dear Ms.  Kerr:

The State of Alaska wishes to provide the following information related to the Final Comprehensive Conservation Plan (CCP) for the Kanuti National Wildlife Refuge for use in future revisions of the CCP. The state recognizes that the final plan has been completed and the Record of Decision has been signed, thus revision of the current document is not anticipated at this time. We nonetheless wish to go on record with these agency comments for your information and future reference to be considered in subsequent revisions.

### Geology

The discussion of geology on page 40 is generally accurate and comprehensive. However, in future references to hydrocarbon potential, the Department of Natural Resources (DNR) would suggest rating the hydrocarbon potential of the refuge as being "low," slightly better than the "little possibility" rating given in the current document. Cretaceous quartz and lithic conglomerates shed from the Brooks range (also noted on page 31, paragraph 4), although strongly folded and faulted, have some hydrocarbon potential.

### Geothermal

As noted in the draft document on page 41, there is geothermal potential in the southeastern portion of the refuge. The preferred management alternative allows (with special use permit restrictions) geothermal and hydrocarbon exploration activities, and hydrocarbon leases on the refuge. If, in the future, geothermal resources are discovered, and interest in development arises, the FWS should consider accommodating geothermal development through a revision to the CCP.

### Access and Transportation

Page 80, Transportation, first paragraph. Response #44 on page 264 of the response to public comments indicates that the

transportation section was revised at the state's request to show that all the airports listed are state owned and operated. However, this change was not made as suggested on page 80. Instead, four of the airports are singled out as state owned and maintained. In future revisions, we request that the plan state that all of the listed airports are state owned and maintained.

Page 80, Transportation, third paragraph. We question the appropriateness of the statement that "State land selections within the pipeline corridor could cause significant impacts by opening up the country." The state presently intends to manage the corridor for the primary purpose of serving development on the North Slope and transporting oil to southern markets. The undefined reference to "opening up the country" implies a level and type of land use which would be unlikely under state management.

We also note that the Red Dog Mine port facility will not be on Hotham Inlet, but just south of Kivalina. Also, we question the statement "Development interests now favor accessing the Ambler area from the Red Dog Port facilities" and suggest that it be documented. The accompanying implication (possibly unintended) that Ambler area access would, or should, be from the west is inappropriate. A more balanced discussion of this topic would recognize that a western route would pass through the Selawik NWR, the Noatak National Preserve, the Kobuk Valley National Park and/or the Cape Krusenstern National Monument. In future revisions to the CCP, we recommend that the CCP discuss the potential of accessing the Ambler District from the Dalton Highway; clarify the relationship between this route and the Kanuti NWR; and note that the route is entirely outside of the refuge boundaries. It should also address the existing use and status of the portion of the route that is a winter road to Bettles. This route is a possible RS 2477 right-of-way, and the alignment near the refuge has been identified for possible upgrading. The discussion should also recognize ANILCA Section 201(4)(b) and (c) which maintain the opportunity for access between the Ambler Mining District and the Dalton Highway through the Gates of the Arctic National Park.

Page 123, Table 15. Construction of roads and airports could be allowed under the provisions of ANILCA Title XI, regardless of which management alternative is adopted. This fact should be indicated in future management tables, making it consistent with the Transportation and Utility Systems section on page 134.

Page 134, Transportation and Utility Systems. This paragraph is well written except that the statement "when valid existing rights are involved" should be deleted from the first sentence. Under Title XI of ANILCA, transportation and utility systems could be constructed on or across refuges, regardless of whether

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Kanuti NWR CCP

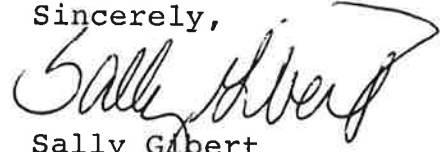
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or not existing rights are involved. In future revisions, this section should be updated to be consistent with modified language which has appeared in subsequent refuge plans.

Thank you for your consideration of these comments in future plan revisions of the Kanuti CCP. If you have any questions please do not hesitate to call this office.

Sincerely,



Sally Gibert  
State CSU Coordinator

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