

STEVE COWPER, GOVERNOR

OFFICE OF THE GOVERNOR

OFFICE OF MANAGEMENT AND BUDGET
DIVISION OF GOVERNMENTAL COORDINATION

STATE CSU COORDINATOR
2600 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2798
PHONE: (907) 274-3528

July 21, 1987

Mr. Walter Steiglitz
Regional Director
U.S. Fish & Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503

Dear Mr. Steiglitz;

The State of Alaska has reviewed the draft Yukon Delta 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 agency concerns and comments.

In general, we find the Yukon Delta CCP to be well organized and consistent with the provisions of the Alaska National Interest Lands Conservation Act (ANILCA). Given the large area covered by the refuge and the numerous villages it encompasses, the refuge and planning staff have clearly made an effort to consider the region's needs.

Most of the issues presented in this letter have been previously raised in state comments on other refuge plans (e.g., comments on fish and wildlife management, and the decision-making process for oil and gas development). The state has some additional concerns, however, regarding the long-term opportunities for continued subsistence uses under the proposed plan. These concerns are more fully explained in the "Subsistence" section below. Also note that agency comments of a more technical nature are included as an Appendix accompanying this letter.

Alaska Coastal Management Program

Based on the information presented in the draft Yukon Delta CCP, it appears that the state will agree with the U.S. Fish and Wildlife Service (FWS) determination that the plan is consistent with the applicable standards of the Alaska Coastal Management Program. A conclusive review of the FWS determination will be made after the final CCP has been issued for public review.

Subsistence

Pages 211-212, Resource Management. The state is pleased to see the CCP's description of subsistence harvest surveys as a "current and ongoing" research activity. The DFG Division of

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

Subsistence continues to be interested in coordinating with the FWS on subsistence studies necessary for guiding related aspects of refuge management. We are particularly supportive of baseline studies that have sufficient detail to serve as foundations for the more focused harvest monitoring surveys.

Additionally, we commend FWS for including several specific references to cooperation with DFG in other text locations. In the passage on page 211, we request additional clarification that cooperation also includes the establishment of research priorities and conduct of the studies listed. We also request that cooperation with DFG be referenced on page 351, Relative Costs of Alternatives.

Page 244, Alternative B, first paragraph, and page 248, Subsistence Use Management. We are very concerned with the potential effects of this alternative on subsistence activities and patterns on the refuge; namely, that "increased economic and recreational use in some areas of the refuge could alter harvest patterns and adversely affect fish and wildlife populations." We request that the discussion address the rationale for appearing to allow a purpose of the refuge (e.g. providing opportunities for continued subsistence use) to be placed at risk due to activities that are not primary purposes, such as "increased economic and recreational use." This comment also applies to the first paragraph on page 252 discussing Alternative C. We agree that adoption of preferred alternative will require careful study of fish and wildlife resources and subsistence use patterns in areas of moderate management.

Pages 296-298, Section 810(a) Finding. The state questions FWS's apparent assumption that restrictions on subsistence use must be "refuge-wide" in order to be significant. This concern is based on statements made in several locations in the CCP. For example, on page 297, the FWS acknowledges that Alternative B (the preferred alternative) "has the potential to significantly affect the subsistence way of life in communities near the areas where commercial activities would occur." The FWS then concludes its 810(a) finding for Alternative B by stating that this alternative "would not result in significant refuge-wide restrictions to subsistence uses on the Yukon Delta Refuge," (page 298). The state does not believe impacts must be refuge-wide in order to be significant.

Even if impacts will be to one community only, there may not be alternative harvest areas or economic alternatives for these residents. In such a scenario, there could be a significant impact to the community involved if competing land uses were allowed. We urge the FWS to address this concern in the final CCP.

July 22, 1987

In addition, the FWS appears to be balancing "positive" against "negative" impacts to subsistence users when making its 810(a) finding. We question whether this is a legitimate process for arriving at a finding, particularly when the "positive" impacts would accrue to users in one part of the refuge (e.g., in the Yukon-Kuskokwim coastal plain) and the "negative" impacts to users in other parts (e.g., near the Kisaralik River). The state does not believe "negative" impacts to one group of subsistence users can be offset by "positive" impacts to another. We find no basis in Section 810 of ANILCA for this balancing process or for assuming that significant impacts must be refuge-wide.

Pages 350-351, final paragraph. The conclusion states that subsistence activities on the refuge would not be affected significantly under any of the proposed alternatives, yet Tables 37-39 suggest that Alternatives B, C, and D: (1) have the potential for adverse impacts to and increased competition for subsistence resources; (2) will increase competition for limited resources, and (3) would create "localized" short-term and long-term impacts from commercial and recreational activities. We again request that the FWS clarify its position on the significance of these impacts.

Oil and Gas

One of the state's long-standing concerns with the planning effort for refuges in Alaska has been the lack of opportunity to conduct certain exploratory activities on most refuge lands. Therefore, the state wishes to commend the FWS for the new policy of providing opportunities for core sampling and seismic studies on lands in the minimal management category. For the Yukon Delta NWR, this means that 90% of the refuge will be open to these exploratory activities, subject to special use permit.

The state is still concerned, however, with the "core" minimal management category (87% of the Yukon Delta NWR) wherein oil and gas leasing is automatically determined to be incompatible with refuge purposes. Consistent with previous comments (see letter of December 23, 1986 regarding the Selawik CCP), the state continues to believe that the decisions regarding oil and gas leasing in this CCP are premature and unsubstantiated by adequate data regarding resource potential, an analysis of environmental effects, and a national interest determination.

The state also continues to urge that Table 18, Oil and Gas Leasing (page 205) be revised to be consistent with the FWS Oil and Gas Policy (Appendix M) and the management provisions on page 229. Specifically the minimal management column should include the following provision for oil and gas leasing, "may be permitted subject to assessment of potential, national interest determination, and a site-specific compatibility determination."

July 22, 1987

Public Participation

Page 10, Periodic Updating of CCP. The state appreciates the FWS's commitment to solicitation of public comments regarding revisions to the CCP. We suggest that prior to approval of minor revisions, interested parties should be notified of the proposed changes. We request that the outline on this page be modified to incorporate this additional step in the planning process.

Page 17, The Role of Local Residents in Refuge Management. The state commends the FWS for its commitment to employ local residents on its staff, and urges the FWS to continue to identify additional strategies to enhance the role of local residents.

Tide and Submerged Lands at Nunivak Island

Page 42, Table 2. The first item lists Federal lands and notes that this entry includes 2,242,000 acres of submerged lands around Nunivak Island. The State of Alaska asserts that it holds title to the tidelands surrounding Nunivak Island pursuant to the Equal Footing Doctrine and the Alaska Statehood Act, and that such title vested in the state upon its admission into the Union on January 3, 1959. The state further asserts that title to the submerged lands surrounding Nunivak Island is held by the State of Alaska pursuant to the Submerged Lands Act of 1953 and Section 6(m) of the Alaska Statehood Act and such title vested in the state upon its admission into the Union on January 3, 1959.

Fish and Wildlife Management

Page 213, Muskox, paragraph 1, last sentence. As stated previously, we urge the FWS to develop a muskox management plan prior to making decisions involving or affecting the muskox population. We encourage the FWS to actively involve all affected land owners and resource managers in the development of this plan and to include public hearings, similar to the current process for the Public Use Management Plan for the Togiak National Wildlife Refuge.

Pages 193-207, Management Categories. The category descriptions in this plan contain several minor alterations in language that differ from language that has been mutually acceptable in the past (e.g., Kanuti Final CCP). Rather than reiterate the list of these variations, we request that the current language more closely follow or be replaced with the language from the Kanuti plan. In the event that this is not a viable approach due to legitimate differences between these plans, we ask that you consult with the DFG/FWS liaison for clarification.

Pages 195-206, Table 18, Wildlife Management Activities. We appreciate the continuing efforts of the FWS to work toward resolution of numerous policy-related concerns regarding fish and

July 22, 1987

wildlife management on national wildlife refuges. With the following modest changes, the state's remaining concerns could be readily resolved.

1) Definition of Temporary. A recent letter (June 15, 1987) from the FWS to the DFG ANILCA Coordinator (attached), stated that the FWS can agree to the definition of "temporary" as proposed by DFG. In light of this agreement, we request that the definition be included as a footnote to Table 18.

2) Wildlife Habitat Manipulation. The state reiterates the viewpoint that restriction of wildlife habitat manipulation activities is inconsistent with the FWS fisheries policy and is an inappropriate restriction of wildlife management options. We request that the fisheries language be used to describe policy for wildlife habitat manipulations, as follows: "may be permitted on a case-by-case basis, subject to provisions of NEPA compliance and a compatibility determination." Also, we request modification of the language regarding this issue on pages 212-214, removing the restriction of habitat manipulation in minimal management and wilderness areas. We further request that the phrases "depending on the management category" and "population management activities . . . are not planned" be deleted. Similar changes are sought for paragraph 2 of page 348 to remove restrictions for categories other than moderate and intensive.

3) Pack Animals. We request that this activity be addressed in Table 18 and referenced in the text. We suggest the topic description include all types of traditionally used pack animals, including dogs, and that the management direction for all management categories in Table 18 be as follows: "Permitted subject to reasonable site-specific closure regulations to protect natural resources."

Motorized Equipment in Wilderness

We request clarification of the circumstances under which use of motorized equipment in Wilderness would be allowed. We note that 50 CFR 35.5 provides for the use of motorized equipment:

- if specifically provided for and subject to existing private rights;
- as necessary to meet minimum requirements for the administration of the area;
- in emergencies; and,
- at places where such uses were established prior to the date the wilderness was designated.

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

We request that these provision be specifically cited.

In addition, ANILCA Section 1316 permits the use of equipment directly and necessarily related to the taking of fish and wildlife in wilderness area, unless such use "would constitute a significant expansion of existing . . . uses which would be detrimental to the purposes for which the affected conservation system unit was established." We request that the discussion be modified to reflect this provision as well.

The state is concerned that the FWS may be interpreting these statutory and regulatory mandates for the management of wilderness areas in an overly restrictive manner. In particular, we are concerned about limiting uses of certain motorized equipment to subsistence users only.

Point Romanzof DEW Line Site

According to the FWS report "Contaminate Issues of Concern and Action Plans" for Alaska refuges in Region 7, the Yukon Delta refuge encompasses an abandoned radar installation (DEW line site) at Point Romanzof. Based on inspections of similar sites in other areas of the state, it is possible that the Point Romanzof site contains hazardous wastes such as PCBs. The state recommends that the discussion in the FWS contaminate report be referenced in the CCP, and that the Common Management Directions section include an intent to field test the site for possible hazardous materials and initiate follow-up clean up efforts if warranted.

Fire Management

Page 197, Fire Management. The state requests that the CCP reference the two existing Interagency Fire Management Plans which encompass the refuge and clarify that fire management on the refuge will be in accordance with these plans.

The state understands that reindeer grazing needs were considered when these plans were developed. We encourage the FWS to continue to work with local communities to identify important reindeer habitat as fire management issues on the refuge are further discussed.

Generic Language

In recent months, the state and the FWS have discussed generic language in addressing a number of management topics. We note that in a few cases the generic language does not appear in the draft Yukon Delta CCP (presumably due to publication deadlines). Consequently, we request that the final CCP include the most current mutually acceptable language.

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

Pages 221-222, Shorelands, Tide and Submerged Lands and Navigable Waters and Water Column. See Innoko draft CCP, page 118, for appropriate discussions of "Shorelands, Tidelands and Submerged Lands" and "Management of the Watercolumns."

Land Status map and table on pages 42-44. The map should be accompanied by the following note: "This figure does not indicate the location of Native allotments, navigable waters, or tide and submerged lands." As currently written, the table's discussion of lands beneath navigable waters is adequate, however offshore tide and submerged lands are not adequately addressed. Therefore the map or table should also indicate that tide and submerged lands are under the jurisdiction of the State of Alaska. Also, we suggest adding the modifier "To date . . ." to the beginning of the last sentence on page 43.

The discussion of water rights on pages 135-136 is largely adequate with the exception of the phrase "reasonable amount of water reasonable necessary . . ." The state has alternatively requested the following substitute language: "minimum amount of water necessary . . ." It is acknowledged by both the state and the FWS that this issue will likely be resolved outside the CCP planning process. However, the state wishes to stay on record that the substitute language above should be used in all CCPs, and that the state will continue to seek an appropriate FWS definition of federal reserve water rights.

We appreciate the opportunity to review the draft CCP for the Yukon Delta National Wildlife Refuge. If you have any questions regarding these comments, please do not hesitate to call this office. We look forward to reviewing the final document.

Sincerely,

Robert L. Grogan
Director


By Sally Gibert
State CSU Coordinator

Attachment

cc: Commissioner Judy Brady, DNR
Commissioner Don Collinsworth, DFG
Commissioner Dennis Kelso, DEC
Commissioner Mark Hickey, DOT/PF
Mr. Rod Swope, Office of the Governor
Alaska Land Use Council Members
Land Use Advisors Committee Members

APPENDIX:
STATE OF ALASKA'S TECHNICAL COMMENTS
ON YUKON DELTA DRAFT CCP.

Page xi and page 4, Purposes of the Refuge. To accurately reflect Congressional intent, we request that the actual language from ANILCA, rather than a paraphrase, be used here.

Page xii, Planning Process, paragraph 3. We request that the second of the "seven potential problems" be modified to read "need for more detailed or site-specific data on wildlife" This revision would remove any potential misunderstanding that the Alaska Department of Fish and Game (DFG) has no data on wildlife of the area. We request that a similar modification be made in the discussion on page 21, paragraph 2, under "Lack of Detailed Data"

Page 14, Declining Populations of Arctic-Nesting Geese, paragraph 4. The third sentence should be modified to read "Under this plan, the signature parties agreed to prohibit the hunting of cackling Canada geese and the taking of their eggs. The parties also agreed to limit the . . ." (emphasis indicates modified language). We request that a similar correction be made to page 74, paragraph 2. The related language on Page 215, as an example, is appropriately phrased.

Page 22, Depressed Wildlife Populations, paragraph 3. We request modification of the the phrase "it is probable" in lines 4-5 to "it is possible" because the conclusion is not substantiated by the discussion. We further request that this section reference the problem discussed on page 24 concerning the enforcement of existing fish- and game-related regulations. While over-harvesting may contribute to depressed populations, a greater problem involves achieving compliance with harvest reporting requirements and other harvest regulations.

Page 22, Reindeer Grazing. We encourage FWS to include an overview of caribou and reindeer use in six lower Yukon River communities, using information from a 1984 report by Robert J. Wolfe and Mary Pete entitled "Use of Caribou and Reindeer in the Andreafsky Mountains" (ADF&G, Division of Subsistence Technical Paper No. 98).

Page 26, paragraph 2. According to the definition contained in the FWS policy manual, muskox qualify as an indigenous species,

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

although they are not known to have occupied the mainland in recent history. We request clarification of the text accordingly.

Page 27, Subsistence. We note that alternatives B, C, and D all provide for activities that could alter subsistence resource harvest patterns and adversely affect fish and wildlife populations. (See discussion on pages 296, 311 and 328.) We also note that recreation, guiding and outfitting are considered significant issues. In the state's opinion, subsistence use is much more prevalent and may be more important economically. In light of this, we request clarification of the assertion that subsistence is not a significant issue in this plan.

Page 44, et al. Resource maps. The maps in this draft document are presented at a scale of one inch to 45 miles. It would be helpful if future documents presented larger-scale maps in the interest of providing better planning and review information.

Page 47, Geology. The statement that the geology of the refuge is "relatively uniform" over much of the area is misleading. We suggest that this section be revised to better reflect the known geological variations of the refuge.

Page 48 (continuing paragraph.) We note that mesozoic strata should not be described as "sediments." Sixty-million year old (and older) strata are more properly described as "sedimentary rocks." Also, the report by G. Ganapole applies only to the Clarence Rhode NWR and Nunivak Island. This report appears to have been inappropriately interpreted to apply to the entire Yukon Delta refuge.

Page 50, Surficial Geology. We request recognition that the conclusions presented here are based on conjecture and limited data. We further note that the "Lyle" report is of limited scope and covers only a portion of the refuge.

Page 51, Petroleum Resources. We suggest discussing the results of two deep exploratory tests in this paragraph. The Pan Am Napatuk Creek Well was drilled west of Bethel in 1961. The Benedum Nulato Well (1960) might provide information about the Cretaceous deposition in the northeast portion of the refuge. Bureau of Land Management (BLM) or U.S. Geological Survey (USGS) geologists should be able to assist in analyzing the results of these exploratory well tests.

Also, Federal agency geologists have performed field work within the refuge, and we suggest that a general discussion of their work should be incorporated here. Two USGS geologists who have performed studies in the area are W.L. Coonrad and Joe Hoare.

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

Page 69, Waterfowl, paragraph 1. We request clarification of the statement "Alaskan wetland habitats are probably producing far fewer birds than their potential." We note that northern habitats have relatively limited productivity, and increased production would be possible only if bird populations regained historic levels. Such levels are in turn dependent on factors which are not directly related to Alaskan wetlands, such as adequate habitat in wintering grounds, harvest regulations, and enforcement of regulations.

Page 69, paragraphs 4 and 8; and page 73, paragraph 1. For accuracy, we suggest that the CCP refer to scientific names when discussing geese because B. c. taverneri and B. c. parvipes are collectively known as "lesser" Canada geese.

Page 73, paragraph 2. We suggest revision of the discussion of declining geese populations to indicate that the brant population as a whole has not "declined drastically" as have populations of the other three species of geese. However, the number of brant nesting on the Yukon-Kuskokwim Delta has declined significantly (Garrett and Wege 1985, summary of 1984 data).

Page 73. We suggest that the title of Table 6 be modified to indicate that the figures are annual indices of total goose populations, not levels of geese "on the Yukon Delta Refuge." In addition, we note that the footnote information is applicable only to cacklers and whitefronts in Klamath Basin (1965-1980) and in the other areas (1981-1985). The emperor index is based on spring counts along the Alaska Peninsula and the brant index is based on January counts in Mexico and Pacific coast states.

Page 74, paragraphs 3-4. We suggest placing more emphasis on the importance of the Yukon Delta refuge to duck populations. For example, the refuge supports nearly one-third of the pintails surveyed in Alaska and also produces more pintails than most areas in the state. We also suggest expanding Table 7 to include the last ten years of data and the estimated percentages of the statewide breeding duck populations.

Page 74, paragraph 5. We suggest expanding the discussion of swans to clearly describe the significance of the refuge habitat for tundra swans. The area supports at least 80-90% of the western population of tundra swans. To substantiate this point, a 10-year summary of data would be helpful.

Pages 78-80, Sea Mammals, paragraph 1. We request that the CCP include documentation for the statement "During the rest of the year beluga feed on fish near the ice pack." The state is not aware of such data on the movements and activities of belugas that use this area, other than in late spring to early summer.

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

Paragraph 2: We suggest modifying the last sentence to indicate that breeding occurs in ice areas to the west and south of the refuge rather than on "Nunivak Island and the marine waters around the island," as stated here.

Paragraph 3: We suggest revising the second sentence to say ". . . these species are associated with sea ice in winter/spring; harbor and spotted seals haul out on land during other seasons." In the fourth sentence, the phrase "seals and sea lions" should be used to clarify that the latter are also marine carnivores.

Paragraph 6: We suggest adding "and damage gear" to the last sentence.

Page 80, Caribou. We request revision of the statement that "there are rarely more than about 200 animals on the refuge at anytime" to reflect that the current high count of caribou in the Kilbuck Mountains is 280 animals. This figure has been substantiated in two separate counts conducted in the fall 1986 and spring 1987. These survey results indicate that, following two years of hunting prohibitions, the population appears to be recovering. The last sentence should also be clarified to indicate that the Western Arctic Herd will probably utilize the northern Andreafsky Mountains rather than the undefined "refuge lands." Furthermore, it appears that the information in the paragraph is derived from Patten's published DFG caribou reports from 1984-1986, which we suggest be cited.

We suggest similar revisions be made in Table 19 on page 213 and the caribou discussion on page 273, paragraph 3 under Wildlife. Due to the harvest closures by the Alaska Board of Game, it is unlikely that caribou will "be eliminated." The text should clarify this point and note that caribou populations in the Kilbuck Mountains are presently recovering from previous over-harvests.

Page 80, Moose, third paragraph. We suggest replacing the words "legally harvested" with "reported harvested." Research across rural Alaska suggests that some moose taken in season are unreported for a variety of legitimate reasons, and that some harvest does occur outside the established seasons. The incomplete data base noted on page 21 is further reason that speculation about out-of-season harvest should be avoided.

Page 81, Figure 19. We suggest modifying the mapped moose distribution to show that most of the moose in the Kuskokwim drainage are not in the Kuskokwim River corridor itself, but instead are in the upper portions of its tributaries (Johnson, Kwethluk, Kisaralik, and Tuluksak drainages).

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

Page 83, Figure 20. We suggest modifying the moose habitat analysis map to show that the key winter habitat for moose along the Yukon River extends downstream to the village of Pilot Station. In addition, the middle of the lower Kuskokwim River should not be depicted as summer moose habitat.

Page 86, paragraphs 5-7. We recommend mentioning the presence of feral reindeer in the Yukon-Kuskokwim Delta in this discussion.

Page 88, Figure 23. We suggest revision of this map to indicate that the Baird Inlet does not provide winter habitat for caribou.

Page 92, Muskox. We request that the discussion of muskox include a citation for Patten's DFG published reports on muskoxen, 1984-1986. The muskox maps on pages 93, 95, and 96 could be made more accurate by deleting water areas that are depicted as muskox habitat. Baird Inlet, the lower Kuskokwim River, and large lakes are neither summer nor winter habitat. Frozen inlets and rivers are not "moderate" winter habitat although muskox occasionally use small frozen lakes where grass protrudes above the ice.

Page 97, Bears. We suggest noting that black bears are common to abundant in riparian habitats along the Yukon River and adjacent sloughs in the eastern portion of the refuge. The discussion could also describe food habits and population parameters.

Page 100, Furbearers. We suggest deleting river otters from the list of "less common" inhabitants of the refuge. River otters are more common than lynx or wolverines and few areas in Alaska have denser populations of river otters than the Yukon-Kuskokwim Delta.

Page 105, Fish, 2nd paragraph, lines 8-9. We request explanation as to why the FWS believes that the subsistence fishery has "given way somewhat" to commercial fishing endeavors. Tables 12 and 13 clearly indicate an increase in commercial salmon harvests in the Kuskokwim and Yukon rivers, but do not show a corresponding decline in subsistence harvest levels.

Page 108, lines 4-6. We do not agree that chinook salmon harvest has increased "significantly" in the study area since 1969. It would be inappropriate to arrive at such a conclusion by comparing single-year (1985) harvest levels with a 10-year average figure. We recommend that FWS review and utilize information from the following reference: Elizabeth Andrews and Michael Coffing, December 1986. Kuskokwim River Subsistence Chinook Fisheries: An Overview. Report to the Alaska Board of Fisheries. ADF&G, Division of Subsistence, Western Region.

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

Page 109-110, Pacific Herring. The subsistence herring fishery in Hooper Bay should be added to this list. In addition, we suggest citing an informative report describing subsistence uses of herring by nine planning area communities: Mary C. Pete, 1984. Subsistence Use of Herring in the Nelson Island Region of Alaska. DFG, Division of Subsistence Technical Paper No. 113. A second report that merits attention is: Mary C. Pete and Ronald E. Kreher, 1986. Subsistence Herring Fishing in the Nelson Island District, 1986. DFG, Division of Subsistence Technical Paper No. 144. Information in these reports was presented to the Alaska Board of Fisheries when the Board established local commercial herring fisheries in the area, and when herring regulations were reviewed by the Board earlier this year.

Page 110, Arctic Grayling. We suggest noting that grayling is a subsistence resource obtained for human consumption in some households. Furthermore, the description of grayling distribution should be revised from ". . .in the Kuskokwim River upstream of Kalskag" to ". . .and throughout the Kuskokwim River Drainage." Arctic grayling are present in the Eek, Tuluksak, Kisaralik, Kasigluk, and other rivers that are downstream of Kalskag.

Page 111, Humpback Whitefish. We suggest noting that extensive human use of this species occurs in the study area.

Page 111, Alaska Blackfish. We recommend modifying the text to indicate that this species remains important in the subsistence economy of Yukon-Delta communities.

Page 112, Other Fish Species. We suggest acknowledging that all of the species listed here are harvested and used to varying degrees for subsistence purposes in most study area communities.

Page 118, Population Trends, paragraph 4, sentence 2. We suggest indicating that Umkumiut is a seasonal hunting and fishing camp.

Page 121, end of third paragraph. The citation should read "Fienup-Riordan 1982" to correspond with the bibliographic entry. We also note the availability of a revised version of the Fienup-Riordan 1983 reference, as follows:

Ann Fienup-Riordan, 1986. When Our Bad Season Comes: A Cultural Account of Subsistence Harvesting and Harvest Disruption on the Yukon Delta. Aurora Series No. 1. Alaska Anthropological Association, Anchorage.

Additional citations that pertain to this entire section on Sociocultural Systems appear in the Alaska Habitat Management Guide, Western and Interior Regions: Distribution, Abundance, and Human Use of Fish and Wildlife, pp. 771-780.

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

Page 129, first paragraph, sentence 2. We suggest clarifying this statement to avoid the possible implication that non-resident fishermen are becoming a major component of the commercial salmon fishery. In fact, only six of approximately 700 permittees in 1986 were not state residents. The number of non-local Alaskans has risen gradually in recent years to a total of 86 in 1986.

Page 131, paragraph 2, line 5. We suggest revising the text to indicate that salmon is the most important species taken throughout much of the area. In the fourth paragraph, the text should note that other factors also influence the location of harvest activities, such as weather conditions, water levels, and economic considerations.

Pages 131-178, Human Environment, Subsistence. In the absence of detailed subsistence land use and associated sociodemographic, economic, and cultural information for most refuge communities, we appreciate the "snapshots" that are presented. However, the reader should be encouraged to note that this presentation does not adequately characterize the multi-faceted dimensions of subsistence use patterns of the predominantly Yup'ik communities of the study area.

This section of the plan could be strengthened through addition of information derived from the Alaska Regional Habitat Management Guide narrative, "Subsistence and Other Local Use in Western Alaska," the Cenaluilriit Coastal Management Program, and from ethnographic and subsistence studies available for the Yukon-Kuskokwim Delta area. We also encourage citation of specific references that were used for developing the individual community summaries.

In addition, we note that the descriptions of community use areas and harvest activities generally are restricted to those occurring within the refuge boundaries. This leaves an incomplete overview for those communities within the boundaries whose residents pursue some activities outside of the refuge. We encourage the FWS not to restrict their attention only to areas used within refuge boundaries when presenting subsistence use area information.

Pages 132-146, Figures 37-50. One important piece of information that could be added to the harvest area map is the time period depicted. Since these maps may be used in a variety of ways over a long period of time, we encourage the FWS to describe their content as precisely as possible. The maps also should note that information for Kipnuk is not presented. The maps do not depict uses of the Tuluksak River drainage by the community of Tuluksak; this could lead to misinterpretations, such as for salmon fishing areas (Fig. 46). We refer the FWS to a report that will provide

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

important information on Tuluksak and recommend that it be added to the bibliography: Elizabeth Andrews and Raymond Peterson, 1983. Wild Resource Use of the Tuluksak River Drainage by Residents of Tuluksak, 1980-1983. ADF&G, Division of Subsistence Technical Paper No. 87.

We suggest referring the reader here to maps appearing in the Interior and Western Region Habitat Management Guide Reference Map Volumes because they provide considerable detail on areas used by the communities for subsistence purposes. In addition, given that areas used by individual communities are not identifiable on the FWS maps, we urge the FWS to clearly specify where the public can view the community maps and obtain a more detailed perspective.

Page 139, Figure 43. DFG data indicate that the subsistence harvest areas for waterfowl includes the Andreafsky, Eek, Kwethluk, and Kisaralik drainages. Although these areas do not contain unusually high numbers of waterfowl, they do have boat access which results in harvests of many ducks and geese.

Page 147, Table 17. We suggest modifying the bear hunting period in the Upper and Lower Kuskokwim to include April and May as "likely." Moose hunting in the Yukon River area should be classified as "likely" during January through March. Very little furbearer trapping occurs during October.

Pages 150-151, Russian Mission. We suggest that FWS add the following information which is based upon our research in this community. The first Russian Orthodox mission was established there in 1851. In 1984, the community had 236 residents. Bear hunting occurs primarily in areas used for fall moose hunting; bear also are sought in the Fish Village area. Trapping would be more accurately described as occurring in one extensive area rather than in two discrete locales. Fiddlehead and sourdock are other plants gathered. Salmon are caught from near Emmonak on Kwikluak Pass upstream to Pearl Island.

Pages 157-158. We suggest adding the following information about Stebbins and St. Michael: Moose hunting in the refuge occurs primarily in the Pitmiktalik and Andreafsky drainages. Wolverine and wolf are also taken. Seabirds are harvested but not within the refuge.

Pages 161-162, Tununak. We suggest the following revisions and additions to this narrative. In line 4, the spelling should be corrected to "Izaviknak." Puffin are among the seabirds taken in the area around Kagalurpak Lake, as well as west of it. Mares tail is another plant species gathered. Salmon also are harvested in the Tununak River drainage. Tomcod, halibut, and codfish are taken by jigging. Capelin are caught with dipnets in

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

front of the village and on beaches to the north up to Nelulugak. Smelts and needlefish are caught with dipnets. "Roe and kelp" should be replaced with "roe-on-kelp." Cisco is another freshwater species that is harvested in rivers and lakes.

Pages 161-164. We suggest reporting the harvest and use of herring by the communities of Tununak, Newtok, Toksook Bay, and Nightmute. The Division of Subsistence Technical Paper No. 144 cited earlier in our comments provides further information in this regard. We also refer the FWS to the Division of Commercial Fisheries for further information, such as the report entitled Pacific Stocks and Fisheries in the Eastern Bering Sea, Alaska, 1986.

Pages 172-173, Kwethluk. We suggest incorporating the following information, provided by Michael Coffing, pers. comm., Division of Subsistence, Bethel, into this section:

Kwethluk is located 1/2 mile from Kuskokwak Slough. Moose are hunted along the Kuskokwim River from the north end of Church Slough upriver beyond the refuge boundary near Aniak. The many sloughs, tributaries, and lakes adjacent to the Kuskokwim River also are hunted. Moose are hunted along the Kwethluk and Kisaralik river drainages from the Kuskokwim River to the eastern refuge boundary in the Kilbuck Mountains. Hunters also utilize the area along the upper refuge near the Eek Mountains and Kanektok River, and on the upper Johnson River between Lower Kalskag and Russian Mission. Caribou are hunted in the Kilbuck Mountains from Eluwaktak and Nukluk Mountains eastward beyond the refuge boundary. This area includes the upper reaches of the Kisaralik, Kwethluk, and Salmon rivers.

Both black and brown bears are hunted in essentially the same area as moose and often during the fall moose hunting season. Bears also are harvested on the upper Kisaralik and Kwethluk river drainages in the Kilbuck Mountains during early spring.

Small game is hunted within an approximate 12-mile radius of the community. Ptarmigan, porcupine, hare, and grouse are the main species harvested. Squirrel are taken in the upper Eek, Kwethluk, and Kisaralik river drainages, and often are harvested in conjunction with bear hunting.

Furbearer trapping and hunting occurs west of the Kuskokwim River from Bethel north to the Johnson River, as well as northeast to the Portage Lakes area west of Lower Kalskag. Areas used that are east of the Kuskokwim extend from the Fog River Drainage southeast of Tuluksak to Karl Creek, southward along the Kilbuck Mountains to the Eek River, then northward to Eek Lake and Bethel. The Kisaralik, Kwethluk, and Eek rivers lie within this use area. Mink, otter, beaver, fox, and muskrat are harvested

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

from the tundra and upland areas of the refuge. Wolves, wolverine, marten, lynx, and fox are taken in the foothills and mountainous regions of the refuge.

Waterfowl harvests occur along the many tributaries, sloughs, and lakes of the lower Kuskokwim River area from Akiachak southward to Kuskokwim Bay. The Eenayarak River drainage, including the many lakes near Eek Lake south of Napaskiak, and the lower portion of the Ishkowik River on the west side of Kuskokwim Bay receive significant use. Waterfowl also are hunted along the coast from Kongiganak to Kinak Bay near Kipnuk.

Plant materials are gathered from Tuluksak west to Takslesluk Lake, then south to the mouth of the Kuskokwim River. Virtually all of the refuge east of the Kuskokwim and from Tuluksak south is used for harvesting plants and berries. Residents often travel as far as Hooper Bay, Chevak, and Russian Mission to harvest salmonberries and blackberries. Lowbush cranberries are found in the higher elevations of the refuge, while salmonberries, blackberries, blueberries, highbush cranberries, crowberries, rosehips, rhubarb, stinkweed, and "mousefoods" are harvested at the lower elevations.

Five species of salmon are harvested in areas that include the Kuskokwim River, Kuskokuak Slough, and the Kwethluk, Akuklikutak, Kasigluk, and Kisaralik rivers. Fishing in the Kuskokwim River occurs generally from the mouth of the Gweek River upriver to just below Akiachak. Family fishcamps are situated along this portion of the Kuskokwim River, Kuskokuak Slough, and the lower Kwethluk River. Both drift and set nets are used in the Kuskokwim River and Kuskokuak Slough. Set nets commonly are used in the Kwethluk River. Salmon also are harvested by rod and reel in these areas.

Freshwater fish are harvested from the Kuskokwim River, Kuskokuak Slough, and from the entire lengths of the Kwethluk and Kisaralik rivers. Fish are also taken from the many small lakes and tributary streams within a 15-mile radius of Kwethluk and adjacent to the Kwethluk and Kisaralik rivers. Harvest methods include set nets, hooking through the ice, rod and reel, and traps. Trout, grayling, and dolly varden are caught in the upper 2/3 of the Kwethluk and Kisaralik drainages. Whitefish, sheefish, smelt, pike, and burbot are taken primarily in the Kuskokwim River near the community. Blackfish, pike, and whitefish also are harvested from the smaller streams and lakes near Kwethluk.

Seals are hunted in the lower Kuskokwim River downriver from Napaskiak and in Kuskokwim Bay from Quinhagak west to Kinak Bay near Kipnuk. Walrus are harvested opportunistically by hunters in search of seals.

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

In further comments about the Kwethluk discussion, we question the statement in paragraph 4 that eiders and scoters are the main species taken, and request additional information in the text to explain how this determination was made.

Preliminary information from Division of Subsistence research in Kwethluk suggests that in terms of pound of usable product from waterfowl, ducks ranked highest and are followed in decreasing order by swans, geese, and cranes.

We understand that FWS has not mapped those areas used for harvesting seabirds, and suggest that the text note that this activity is underrepresented in the community summaries and on the resource harvest area maps.

Page 168, Nunapitchuk, last paragraph. Pike also are important during the ice-free months.

Page 169, paragraph 1. We recommend the following to replace the third sentence: "Chinook, silver (coho), chum, and sockeye salmon are the main species harvested, although a few pinks are also taken."

Page 171, Bethel, second sentence. We suggest noting that Bethel was also a Yup'ik settlement prior to being established as a trading post.

Page 172, Bethel, first full sentence. We suggest revising the first part of this sentence to read "While more residents of Bethel rely more on a cash economy than in any other community in the area"

Page 179, Overland Access. Although portions of the ice-covered Kuskokwim River are plowed by the villages, those sections are not designated as a state highway.

Page 184, Criteria for Wilderness Review and Evaluation. We request that a statement be added to this section similar to that on page 190, which states "Subsistence harvest of resources has occurred here for thousands of years and is a natural part of the ecosystems." Such a statement is important to include under the refuge-wide narrative, as opposed to including it only in the regional narrative on page 190.

Page 200, Table 18, Subsistence Activities. Line 3 of the left column would be more accurate if modified to read "personal and family consumption"

Page 213, Table 19. We concur with the notation in the table that the information needed to establish minimum population levels for moose and caribou is not available. We are concerned,

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

however, that the text indicates that populations would be managed in order to achieve maximum carrying capacity, and suggest that additional clarification be provided. There are no actual data regarding optional populations or carrying capacities for moose and caribou. Game Management Unit 18 could possibly support 3000 or more moose if all available habitat was "filled." Similarly, we believe the Kilbuck Mountains could potentially support at least 10,000 caribou and the Andrafsky Mountains could potentially support 5-10,000 caribou. However, such figures would need to be discussed in light of other considerations including specific area management objectives. We would appreciate the opportunity to discuss any proposed revision that addresses quantitative figures for carrying capacities.

Page 219, lines 2 and 4. We suggest replacement of the word "suppressed" with "depressed."

Page 224, lines 9 and 10. We request the replacement of the term "subsistence office" with "Division of Subsistence."

Page 224, Access and Transportation, first paragraph. The marking of trails for safe winter travel between villages is frequently necessary. Marking with signs, tripods and other highly visible methods should be allowed in all management categories.

Pages 226-228, Public Uses. We request adding a paragraph addressing "temporary facilities" and closely paraphrasing ANILCA Section 1316 here. While adequately described in the introductory sections, it would be appropriate to include a statement in the Common Management Directions section.

Page 229-230, Transportation and Utility Systems. The end of the first sentence ". . . when valid existing rights are involved" should be deleted. The most advantageous location for a transportation or utility facility need not coincide with a possible valid existing right.

Pages 230-232, Wild River Management. Attached for your information is a copy of the Alaska Land Use Council guidelines entitled "A Synopsis for Guiding Management of Wild, Scenic and Recreation Rivers in Alaska." We request that these guidelines, adopted by the ALUC in November 1982, be acknowledged in this section.

Page 273, paragraph 5. We suggest modification of the discussion of furbearers. River otter harvest approached record levels in 1983-84; these levels were associated with favorable trapping conditions in November-December. River otters are not "a suppressed population," but remain common. Also, the data for annual harvests reflect weather conditions occurring in

Mr. Walter Steiglitz
Yukon Delta NWR
Draft CCP

July 22, 1987

November-December, rather than indicating population trends. The reference to red fox on Baird Inlet should be deleted.

Pages 291, 302, 308-309, 317, 325, 333, 339, 342 and 347. Alternatives B, C, and D discuss gas/oil/mineral/subsurface developments on the tundra ridges east of Dall Lake. This area provides habitat for a growing herd of mainland muskoxen (12-20 animals) that could potentially be affected by such development. We suggest that potential impacts be addressed and pertinent information presented, including available data on the movements of this herd. The herd is resident year-around in this area, and moves north-south primarily on the low tundra ridges between Dall Lake, Tuntutuliak, and the Johnson River.

Several times in the draft plan and on page 351, the suggestion is made that local perceptions "of intrusion by outsiders on their way of life and the ensuing loss of control" will be the major adverse effect felt locally. In fact, such intrusion and loss of control are real and noteworthy impacts. We request that the text be revised to clarify that these impacts have tangible and pronounced effects on local residents and communities.

Page 351. In the continuing paragraph, the statement is made that "Actual resource impacts under all the alternatives will probably only have minimal adverse impacts to the subsistence activities of local residents." This statement inappropriately implies that localized adverse impacts, habitat loss, and wildlife displacement only affect communities in the immediate area.

Page 372. We suggest adding the following names to the species listing of mammals of the refuge area: Killer whale, Orcinus orca; Harbor porpoise, Phocoena phocoena; Minke whale, Balaenoptera acutorostrata; and Gray whale, Eschrichtius robustus. These species of cetaceans are known to occur in very nearshore waters of the refuge. References are:

Frost, K. J., L. F. Lowry, and J. J. Burns. 1983. Distribution of marine mammals in the coastal zone of the Bering Sea during summer and autumn. Pages 365-561 In: Environmental Assessment of the Alaskan Continental Shelf, Final Reports of Principal Investigators, Vol. 20. OCSEAP. Juneau, AK.

Lowry, L. F., R. R. Nelson, and K. J. Frost. 1987. Observations of killer whales, Orcinus orca, in western Alaska: sightings, strandings, and predation on other marine mammals. Canadian Field-Naturalist 101:6-12.



Attachment to YUKON DELTA CCP state letter of
July 22, '87

United States Department of the Interior

FISH AND WILDLIFE SERVICE
1011 E. TUDOR RD.
ANCHORAGE, ALASKA 99503

IN REPLY REFER TO:
PL/PSS 0283Y

Alaska Department of Fish and Game
Attention: Marianne G. See
333 Raspberry Road
Anchorage, Alaska 995181-1599

Dear Ms. See:

Thank you for your continued efforts to resolve the issues that have been nagging the Alaska Department of Fish and Game (Fish and Game) and the Fish and Wildlife Service (Service) during the refuge planning process. Because these are policy decisions, the planning branch forwarded your concerns to me for response. I am pleased with our progress toward reaching understanding on these issues.

Our responses to the specific issues raised by Fish and Game are as follows:

Fish Hatcheries

Definition of temporary: The Service can agree.

The supplied wording: The Service suggests, that as only Fish and Game will be constructing hatcheries, and that any hatchery must be constructed under either a special use permit or cooperative agreement, that all language be dropped, and simply state, "The construction and operation, by the State, of required facilities for incubation of fish eggs and/or rearing of fish would be subject to the National Environmental Policy Act, compatibility, and a special use permit."

Non-profit associations are not categorically denied from seeking permits to conduct activities on refuges, and those that are compatible and meet National Environmental Policy Act requirements could be permitted.

Commercial Fishing Support Facilities

The Service stands on the wording as written.

The plan was the vehicle that began the public notice process to limit shore-based support facilities to those currently existing. The Service, after public notice, conducted a hearing on May 13, 1987, as required by Section 304 (d) of The Alaska National Interest Lands Conservation Act (Act) to accept comments from the public. Once the public testimony and comments are reviewed and considered, this proposal may ultimately lead to no new permits for shore-based facilities. I understand Fish and Game's concerns for harvest opportunities. The matter of future value of permits was not brought up at the public meeting when the issue of no more shore-based facilities was discussed. By indicating in the preferred alternative what the intention is, we feel the public is better served.

Fish Rearing Pools

The language from the Kanuti plan can be added.

Mariculture

Definition: At this time the Service stands on the definition as written.

Shellfish mariculture, when and where legal, appears to have little negative biological impact. Expanding the definition to include salt-water organism is far too broad. Too little is known of the impacts of waste products from finfish mariculture at this time. As the Service has stated, this is a dynamic plan that can be revised, and does not have to cover every eventuality at this time.

Wildlife Manipulation

The Service stands by the language in the plan.

Habitat manipulation on Kodiak National Wildlife Refuge is extremely unlikely at anytime. No precedent will be set by not including it as an activity on a refuge where it will serve no purpose. Except in rare cases mechanical manipulation will be precluded in designated wilderness areas on all refuges.

Grazing

The Service stands by the language as written.

As discussed on page 357 of the plan the Service intends to limit this activity after proper procedures, and has opted to take a clear approach that the activity is not permitted even though in the present situation the manager could issue a permit. It is more forthright to take this approach than have a plan say it is permitted when in a short time it would not be permitted. The Record of Decision can reemphasize that position.

Pack Animals

See page 357 and answer given above.

Guiding, Outfitting, Transporting

For the duration of this version of the plan the Service stands by the current wording.

Temporary Facilities

It is the intent of the Service to limit this activity. See page 357 and the answer given above.

Recreational Cabins

The Service appreciates the proposed change and could accept it for non-wilderness areas. However, the Act is specific on new cabins in wilderness (See section 1317), therefore the language as written is correct.

Other Motorized Vehicles

The language, as written, is correct. Title 50 of the Code of Federal Regulations prohibits such use. The Service does have the option to designate routes or areas for other motorized vehicles. To date no such routes have been identified and it is not the Service's intent to do so during the life of this version of the plan.

Cabins (Subsistence)

There are no subsistence cabins on Kodiak and there is no apparent need for them so it is appropriate to not include them in this version of the plan.

House, Log and Firewood Collection

Given the fact there is little need to cut firewood, and there are very few house logs on Kodiak Island this category seems unnecessary. Further, while there are logs on Afognak Island, there is no need on Afognak Island, and it is too far away from Kodiak Island to make subsistence taking practical.

Motorboats

The Service stands on the language as written. See page 357 and the answer given under "Grazing."

Land Planes and Float Planes

The Service specifically identified two types of landing capability and added restrictions to wheeled planes to keep them out of certain areas. To implement this closure the necessary steps will be taken to promulgate regulations to carry it out.

The Service has a concern that the plans are beginning to contain so much "boiler plate" that the differences between management alternatives are being eliminated and soon there will not be enough difference between alternatives to satisfy the National Environmental Policy Act requirements.

I hope this adds to your understanding of, not only the positions the Service is taking, but also why we have taken those positions. If you have further questions, do not hesitate to contact us.

Sincerely,



Regional Director

cc: Refuges South
Kodiak National Wildlife Refuge

Title: Yukon Delta NWR draft CCP

[1272] Mr. Mike Abbott, Resource Development Council, Anchorage
[1304] Ms. Susan Alexander, The Wilderness Society, Anchorage
[1266] Ms. Gail Baker, U.S. Fish & Wildlife Service, Anchorage
[1317] Dr. Robert Baker, Anchorage
[1312] Mr. James Barkeley, Esq., Land Use Advisors Committee, 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
[120] The Honorable Judy Brady, Department of Natural Resources, Juneau
[1372] Mr. Al Carson, Department of Fish and Game, Anchorage
[248] The Honorable Don Collinsworth, Department of Fish and Game, Juneau
[1373] Mr. Donald D'Onofrio, National Ocean Service, Anchorage
[1293] Mr. Bart Englishoe, Land Use Advisors Committee, Anchorage
[213] Ms. Joaqlin Estus, Division of Governmental Coordination, Juneau
[1286] Mr. Boyd Evison, National Park Service, Anchorage
[1117] The Honorable Jan Faiks, Anchorage
[975] Mr. Darryl L. Fish, Bureau of Land Management, Anchorage
[203] Mr. Peter Freer, Department of Community and Regional Affairs, Juneau
[1263] Mr. Joseph W. Geldhof, Department of Law, Juneau
[1407] Mr. Harold Gillam, Land Use Advisors Committee, Fairbanks
[944] Mr. Clay Hardy, U.S. Fish & Wildlife Service, Anchorage
[1268] The Honorable Mark Hickey, Dept. of Transportation & Public Facilities, Juneau
[1406] Reverend J. Michael Hornick, Land Use Advisors Committee, Anchorage
[1413] Mr. Clark Horton, Federal Aviation Administration AAL-4, Anchorage
[1271] Ms. Sharon Jean, Land Use Advisors Committee, Soldotna
[444] Mr. John Katz, Office of the Governor, Washington, D.C.
[1288] The Honorable Dennis Kelso, Department of Environmental Conservation, Juneau
[1267] Ms. Leslie Kerr, U.S. Fish & Wildlife Service, Anchorage
[1298] Dr. John Choon Kim, Land Use Advisors Committee, Anchorage
[1270] Mr. Larry Kimball, Alaska Federation of Natives, Anchorage
[1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
[937] Ms. Janie Leask, Alaska Federation of Natives, Anchorage
[1243] Mr. Robert LeResche, Alaska Power Authority, Anchorage
[1258] Mr. Craig Lindh, Division of Governmental Coordination, Juneau
[1284] Mr. Bryan MacLean, Bering Straits CRSA, Unalakleet
[1254] Mr. Joe Mazzoni, U. S. Fish & Wildlife Service, Anchorage
[945] Ms. Janet McCabe, National Park Service, Anchorage
[946] Mr. Ron McCoy, Alaska Land Use Council, Anchorage
[1400] Ms. Cynthia Meyer, Division of Governmental Coordination, Juneau
[1269] Mr. Mike Mitchell, Alaska State Library, Juneau
[1316] Mr. Barry Moorhead, Federal Highway Administration, Juneau
[947] Mr. Ron Morris, U.S. Department of Interior, Anchorage
[499] Mr. Donald Nielsen, Bristol Bay Native Corporation, Anchorage

July 20, 1987

Title: Yukon Delta' NWR draft CCP

- [1244] Capt. James R. Nutgrass, Department of Public Safety, Anchorage
- [1408] Mr. Richard Ogar, ARCO Alaska, Inc., Anchorage
- [469] Mr. Larry Ostrovsky, Department of Natural Resources, Juneau
- [1290] Ms. Debra Oylear, Division of Governmental Coordination, Anchorage
- [1287] Mr. Michael J. Penfold, Bureau of Land Management, Anchorage
- [124] Ms. Anna Phillips, Bethel
- [1279] Mr. Gerald Rafson, Dept. of Transportation & Public Facilities, Fairbanks
- [1409] Mr. John Rense, NANA Development Corporation, Anchorage
- [1273] Mr. Randy Rogers, Northern Alaska Environmental Center, Fairbanks
- [1299] Mr. Wayne Ross, Land Use Advisors Committee, Anchorage
- [87] Dr. Lidia Selkregg, Land Use Advisors Committee, Anchorage
- [1378] Mr. Thyas Shaub, Department of Commerce and Economic Development, Juneau
- [948] Mr. Walt Sheridan, U. S. Forest Service, Juneau
- [1275] Mr. Ron Silas, Tanana Chiefs Conference, Fairbanks
- [60] Mr. Jim Stratton, Land Use Advisors Committee, Juneau
- [22] Mr. Rod Swope, Office of Management and Budget, Juneau
- [1377] Mr. Len Vining, Department of Fish & Game, Anchorage
- [1242] Mr. Ike Waits, Department of Community & Regional Affairs, Anchorage
- [1239] Mr. Rob Walkinshaw, Department of Natural Resources, Anchorage
- [940] Mr. Vernon R. Wiggins, Alaska Land Use Council, Anchorage
- [1240] Mr. Dan Wilkerson, Department of Environmental Conservation, Anchorage
- [994] Mr. Geoff Wistler, Department of Commerce and Economic Development, Juneau