

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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March 16, 1990

Mr. George Constantino
Associate Manager, Refuges and Wildlife
U.S. Fish and Wildlife Service
1011 East Tudor Road
Anchorage, AK 99503

Dear Mr. Constantino: *George*

The State of Alaska has reviewed the Internal Review Draft of the Public Use Management Plan for the Togiak National Wildlife Refuge. The following consolidated comments are submitted on behalf of State resource agencies. We appreciate the opportunity to comment at this phase of the planning process. Given the short review time, there may be additional comments that arise after a more thorough review of the public review draft.

Except for limits on non-guided use, the State generally supports the overall direction outlined in the plan for recreational river management in the Togiak Refuge. State agencies have, however, identified concerns regarding the scope, the inadequate ANILCA Section 810 Analysis, and some of the specific management tools and supporting justification. These topics are discussed in more detail below.

The State looks forward to reviewing the public responses to the plan and working with the U.S. Fish and Wildlife Service (FWS) to modify the plan to address public concerns. The State is further committed to working with FWS to ensure that provisions of the plan are effectively implemented in a manner consistent with applicable State law.

Scope and Title of Plan

The plan generally focuses on management of uses associated with sport fishing and other recreational river uses; however the title and introductory pages paint a much broader picture. Based on the thrust of management proposals in the plan, the State urges that the title be changed to "Recreational River Use Management Plan."

The State also strongly recommends inclusion of an introductory section that explains the purpose of the plan, lists issues that are addressed, and issues that are not addressed. This section

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should explain the relationship of this plan to other step-down plans required to address the other important public use issues, including the management of big game, waterfowl, furbearers, marine mammals, and commercial fishing. Attachment II of this letter provides additional information for some of these other public use issues.

The introduction should also state that the plan does not propose any new guidelines for the management of subsistence, but acknowledge that the impacts of the proposed plan on subsistence will be addressed. (Right now the document does not adequately assess subsistence impacts, but we hope the draft can be improved before it receives public review. See more detailed comments on this topic elsewhere in this letter.)

Such an introduction could go a long way toward facilitating more meaningful public review.

STATE RESPONSE TO PROPOSED REFUGE POLICIES

Commercial Use Levels

The State generally supports the concept of limiting commercial use levels on the refuge; however to avoid appearing arbitrary, Section II of the PUMP should provide justification and explanation of the proposed use levels and the number of operators and camps to be allowed in each planning unit.

Non-Guided Use

The State does not support establishing limits proposed on non-guided use for the Kanektok, Goodnews and Togiak rivers. The State does not believe that there is adequate justification at this time for such limits. The FWS should treat the Kanektok, Togiak and Goodnews similar to other units where there are no limits proposed for non-guided use.

Recreational Use Allocation System

The State will work with the FWS on the details of implementing the plan's allocation system to ensure consistency with Alaska Statutes.

In addition, as you know, the Alaska Department of Fish and Game (DFG) is currently re-vamping the State's management programs for commercial guiding operations, such as big game guiding. DFG will continue to work closely with FWS to maximize common ground

regarding these programs, including proposed licensing of sport fish guides.

Horsepower Restrictions

The State supports in concept restricting horsepower size on rivers in the refuge where it can be shown that larger motors cause significant safety and environmental problems. We are interested in the public's response to the size of motors and locations where restrictions are proposed. After the public meetings, State agencies will work with FWS to ensure that implementation is consistent with applicable State law.

Float-Only Rivers

The proposal for making the upper Kanektok a float-only river may have merit. However, restrictions that apply to State land and waters must apply to all user groups, not just non-subsistence users. State agencies are interested in the public response to the proposal and will work with FWS on this proposal in the final plan to ensure that its implementation is consistent with the Alaska Constitution.

Public Use Sites

The plan should identify and include a list and map of important public use sites for each planning unit throughout the refuge. If managers and users know where these sites are, activities can be managed to protect the sites and ensure their availability for public use.

We realize that there is not enough time to identify all sites for inclusion in the public review draft. Attachment I contains a preliminary list of Public Use Sites for two of the planning units. The State recommends that the FWS use the upcoming public review phase to fine-tune the locations of these sites and seek additional information about other public use sites that should be identified.

The State also recommends that FWS include a sixth objective on page 11 of the PUMP: "Ensure availability of public use sites to meet the needs of all users."

Camping Restriction in Wilderness Planning Units 5, 9, and 12

The proposed 3-day limit on tent camps at one location in designated Wilderness may be useful to ensure that a few parties don't monopolize prime fishing sites. It seems, however, to unnecessarily restrict other recreational activities including hunting, trapping, and back country use. Further, use of tent camps for more than 3 days may be necessary to ensure public

health and safety during periods of inclement weather. It also seems unnecessary to maintain the 3-day limit year around. Finally, restricting the use "at the same location" is easily circumvented by moving a short distance and, therefore, difficult to enforce. We recommend that this proposal be fine-tuned to address these concerns. At a minimum, the restriction should only apply to the few weeks representing the peak season of river use.

As an alternative, the FWS should consider identification of Public Use Sites for selected sites or portions of the river. It is a less-restrictive approach that nonetheless addresses the FWS intent to prevent a single party from monopolizing a prime camping or fishing spot.

Possible Policy Gaps

The following comments generally point out sections of the plan where insufficient information or discussion results in confusing or incomplete management policies. In some cases a simple clarification will resolve the question. In other instances, these comments may highlight management concerns that need further attention.

- o Not all local use is subsistence use. How will this plan affect local residents engaged in sport fishing and other recreational pursuits?
- o We recommend standardization of the charts in the planning unit sections titled, "Recreational Use Levels During Fishing Season." As currently written, some units have limits on both floatboat and motorboat use. Others address limits on just one use. In units where limits are set for only one use, does this mean there are no limits on the other type of use? This should be clarified and presented more consistently.
- o Regarding the contract award process, Schedule 1 on page 15 proposes to allocate total amounts of motorboat, floatboat, and fly-in "use days" for the major refuge river systems. The plan should specify what type(s) of associated recreational use is targeted by these levels; e.g., fishing trips, hunting trips, and/or other uses.

Consistency With ANILCA

This plan includes several proposals that would restrict various types of public uses related to access for traditional activities. Setting aside the merits of each proposal, the State wishes to emphasize the importance of complying with Section

1110(a) of ANILCA, which requires a finding that "such use would be detrimental to the resource values of the unit".

For example, current motorboat use on the Kanektok River totals 686 use days. Several provisions of ANILCA protect traditional access methods, including access by motorboats. According to ANILCA Section 1110(a), FWS should make a determination of how the use of motorboats is detrimental to resource values of the refuge prior to initiating such a prohibition. Information supporting such a determination should be included in the plan if it is to be the vehicle for implementing this proposal. The analysis should include documentation of the number of motorboat operators currently using this unit and the potential impacts of the proposed closure on motorboat use in both the upper and lower river area. If any of this information is not available, the plan should include a description of studies that will be conducted to meet ANILCA's requirements.

To the extent that access for traditional activities is affected by other provisions of the plan, the above procedures should be followed for these restrictions as well.

PROPOSED MANAGEMENT FOR STATE UNITS

The following proposed management recommendations are provided by the Alaska Department of Natural Resources for inclusion in the Togiak PUMP public review draft for the following refuge planning units:

- UNIT 1 (IGUSHIK/SNAKE RIVERS)
- UNIT 4 (LOWER TOGIAK RIVER)
- UNIT 8 (LOWER KANEKTOK RIVER)
- UNIT 10 (AROLIK RIVER SYSTEM)
- UNIT 11 (LOWER GOODNEWS RIVER)

For these units, the following text should be inserted on pages 21, 27, 37, 42, and 44:

Proposed Management

Management of the (insert name of planning unit) will be directed toward maintaining access and ensuring access is not denied to the navigable or public waters of the State for any citizen of the United States or resident of the State (Article VIII, Section 14 of the Alaska State Constitution).

(continuation of insert for Refuge Planning Units 1, 4, 8, and 11:)

Short Term Uses (uses that take place at one site on State land for 14 consecutive days or less)

Short-term uses are allowed. Permits are not required for short-term uses. Camping, hiking and fishing are examples of short-term uses.

There are no established limits on the level of short-term use allowed in this planning unit.

Long-term Uses (uses that take place at one site on State land for longer than 14 consecutive days)

DNR currently issues permits and leases for permanent camps and lodges, temporary base camps, floating facilities, boat storage sites, primitive tent sites and other uses that occur at one site on State land for longer than 14 consecutive days. Long-term uses require a DNR permit or lease.

Permanent camps and lodges, and temporary base camps are prohibited in this planning unit. Shorelands in the unit flood periodically. Authorizing facilities in places that are likely to flood can jeopardize public safety and environmental protection.

Floating facilities, boat storage sites, and primitive tent camps located at one site on State land for more than 14 consecutive days may be allowed in this planning unit on a case-by-case basis.

Public Use Sites

Public use sites are any sites identified that are important for public access (including important float and wheeled plane landing areas), camping, hunting, fishing, or other recreation.

The management intent for these sites is to protect the opportunity for users to use the sites, and to protect the public values of the sites.

Short-term uses (uses that take place on State land for 14 consecutive days or less) are allowed at public use sites.

The following long-term uses (uses that occur at one site on State land for more than 14 consecutive days) are prohibited at public use sites: permanent camps and lodges, temporary

(continuation of insert for Refuge Planning Units 1, 4, 8, and 11:)

base caps, floating facilities, boat storage sites, and primitive tent camps.

The public use sites identified in this planning unit are: (list sites). [See accompanying maps and descriptions (Attachment I) for sites within planning units 4 and 5 which have been identified to date].

Coordination With Adjacent Upland Landowner

Application for shoreland uses that require use of private uplands will not be considered until there is a written agreement between the applicant and the upland owner(s) approving the necessary use. The term of the lease or permit should not be longer than the term of agreement between the applicant and the upland owner. If the applicant has not applied for use of the adjacent uplands, the application must show how all necessary associated uses will be accommodated on the shorelands.

Defining the location of ordinary high water and, therefore, the boundary of state-owned shorelands is often difficult and may require technical expertise. If DNR issues a permit, DNR will require applicants to use areas that will reduce the likelihood of possible land ownership disagreements with upland owners (such as unvegetated gravel bars).

ADDITIONAL COMMENTS ON THE PROPOSED PLAN

Definitions

Terms such as "guides" and "guiding" used throughout the document (especially the planning unit management proposals) should be replaced wherever possible with more specific terms, such as sport fishing guides, recreation guides, marine transporter, etc. Without more specific terminology, it is difficult to know which type of activity is being managed in each unit.

The following revisions to some of the definitions (pages 16-18) are necessary to be consistent with state law:

BIG GAME GUIDE. A big game guide-outfitter means a person licensed by the State of Alaska to conduct guide-outfitted hunts and services in Game Management Units 17 and 18 within the Togiak Refuge.

OUTFITTER. An outfitter means a State of Alaska licensed interim big game outfitter authorized to conduct outfitting services in Game Management Units 17 and 18 within the Togiak Refuge. All interim outfitter licenses will terminate by mid-1991.

(Note: FWS may wish to eliminate the definition of outfitters because the category of an interim outfitter license will sunset soon.)

It is also suggested that the definition for "recreation guide" be changed to clarify whether river guides are included. Assuming they are included, the definition should be changed to read as follows: "A recreation guide means a commercial operator who accompanies clients on trips into the refuge for photography, sightseeing, river trips, or other activities not related to hunting or fishing."

In addition to the above revisions, please add the following new definitions:

FLOATING FACILITY. Includes floathomes, floatcamps, floating lodges, floating caretaker facilities (including mariculture), floating recreational facilities, and other floating residential or commercial facilities located on State shorelands, tidelands, or submerged lands.

NAVIGABLE. Waterbodies that are capable of transporting people or goods. The land beneath them is owned by the State. These waterbodies extend to the line of the ordinary high water (usually the vegetation line). The adjacent uplands may be in private ownership and not available for use without permission.

ORDINARY HIGH WATER MARK. The mark along the bank or shore up to which the presence and action of the nontidal water are so common and usual, and so long continued in all ordinary years, as to leave a natural line impressed on the bank or shore and indicated by erosion, shelving, changes in soil characteristics, destruction of terrestrial vegetation, or other distinctive physical characteristics [from 11 AAC 53.900(23)].

PUBLIC USE SITE. Any site identified that is important for public access (including important float and wheeled plane landing areas), camping, hunting, fishing, or other recreation.

SHORELANDS. Land belonging to the State which is covered by nontidal water that is navigable under the laws of the

United States up to the ordinary high water mark as modified by accretion, erosion, or reliction [from AS 38.05.965].

SUBMERGED LAND. Land covered by tidal water between the line of mean low water and seaward to a distance of three geographical miles [from AS 38.05.965].

TIDELAND. Land that is periodically covered by tidal water between the elevation of mean high and mean low tides [from AS 38.05.965].

Section IV, Description of the Alternatives

This section contains charts describing each of the alternatives. For the units where the State has primary management authority, please revise these charts as follows:

Replace "Floathomes" with "Floating Facilities" for consistency with the definitions and guidelines in Section II.

Also, on pages 60, 61, 64, 65, 68, and 69, change "NL" (no limit) for boat storage sites to "MBA" (may be allowed). For clarity, these abbreviations should be defined in a footnote to each chart.

Impacts of the Plan on Subsistence and Other Uses

One of the plan's objectives listed on page 11 is "to provide public use programs which minimize possible conflicts between and among subsistence, recreational and commercial uses." To accomplish this objective requires a high degree of understanding of the impacts of various management options on each of these user groups. The State recognizes that the FWS is trying to achieve a land management strategy that balances the needs and desires of these user groups. Unfortunately the planning document does not adequately reflect the thinking and rationale behind the various proposals, nor does it assess them in a meaningful way. The sparse attention to impact analysis and rationale allows the possible interpretation that the proposed policies may not be well thought out or appropriate.

The superficial discussion of the impacts on subsistence is particularly troublesome since ANILCA Section 810 contains special requirements to insure that such impacts are fully understood and minimized prior to making decisions. We recognize that FWS has done a considerable amount of work in this area. It is not, however, reflected in the document in general, or the 810 Analysis in particular. Thus, it is difficult for State agencies (or the public for that matter) to evaluate the proposals and impacts.

For example, the 810 Analysis should more adequately assess the effects of displacement of subsistence fishers from traditional subsistence fishing sites by the proposed allocation of guided sport fishing opportunities. This displacement concern applies to non-refuge lands, such as the lower rivers, and to those refuge planning units where increases in use are proposed, e.g. Units 13A and 13B where a 140% increase in guided use days is proposed. The secondary impacts of recreational use, such as trespass and litter, should also be addressed. [DFG indicates that Kuskokwim River subsistence users annually harvest a moderate (not low) amount of fish and wildlife in this unit.] Without documentation of such analyses, it is difficult to evaluate whether the management scheme proposed will have a net increase or decrease of overall subsistence impacts.

The ANILCA 810 Analysis should also reflect the management actions proposed by the State for the lower river units where the State has primary management jurisdiction. It could be argued that the 810 Analysis should directly assess the impacts of the proposals for the lower rivers since they are within the Refuge boundary and speak to the same overall management concerns. But since these are State management proposals, it is not immediately clear if this would be appropriate. However, at a minimum, the 810 Analysis should assess the FWS proposals in light of the State's management proposals.

Further, the proposed policies do not appear in the full context of the public use conflicts known to be occurring in and around the refuge. Obviously the plan itself cannot solve all the current problems. But, once again, an understanding of this context is critical to constructive participation in the planning process.

Perhaps the new introductory section we have previously recommended (see comment regarding "Scope") could be structured to address this concern. Examples of issues that should be acknowledged (even if the plan may not be able to address them) include differing cultural perceptions regarding catch and release; trespass, litter, and sanitation concerns; the difficulties imposed by mixed landownership patterns; etc.

Implementation and Future Planning

The plan should identify significant planning needs and how progress toward program objectives will be evaluated in anticipation of an updated plan within the next five to ten years.

Criteria should also be developed for determining threshold levels, if any, of important public uses that would trigger permitting restrictions or regulations for the protection of refuge resources.

REMAINING TECHNICAL COMMENTS

Page 2, Fourth Paragraph, Purposes: We suggest insertion of the word "include" at the end of the introductory statement in this paragraph, consistent with the language in ANILCA. This change indicates that the described purposes are not exclusive and also provides for the full range of objectives described in this draft.

Page 4-5, Special Values of Togiak Refuge: This section currently discusses only those special values of the refuge that are related to wilderness, scenic values, and fishing opportunities. Other special values from the CCP are not mentioned. The section should clarify that the list is limited, or be expanded to include the following:

Cape Peirce, Cape Newenham, Chagvan Bay, and Nanvak Bay were identified in the CCP as special values of the refuge. Walruses, including the Cape Peirce walrus haulout, were identified in the CCP as a resource of national importance that would receive special attention by the FWS. Both Cape Peirce and Cape Newenham support several hundred thousand seabirds that provide significant opportunities for viewing and scientific study. According to the CCP, Nanvak and Chagvan bays are popular, high use waterfowl hunting areas with potential for public viewing, scientific study, and/or hunting.

Page 4, Literature Cited: Three documents are referenced on page 4 (Gordon and Shane 1978, Young and Walters 1982, Hoare and Coonrad 1978), but the plan appears to lack a Literature Cited section except one specific to Appendix B.

Page 6, Fourth Paragraph, Existing Recreational Activities: The background information currently describes trends in the levels of public use between 1981 and 1984. However, since trends have changed since 1984, information should also be provided on more recent public use levels, including where guided and unguided use has stabilized, increased or decreased since 1984.

This paragraph refers to 22 permitted sport fish guides on the refuge but Table 1 on page 50 indicates there are currently 37 permitted guides on the refuge. Clarification should be made whether this reflects an error or a different definition of guides in each instance.

Page 7, Second Paragraph, Lands and Resources Affected by this Plan: Since "Resources" occurs in the title of this section, the state's primary role as manager for fish and resident wildlife on the refuge according to the Master Memorandum of Understanding (MMOU) between FWS and DFG should be referenced in this paragraph. If the intent of this section is to simply describe land

status, the word "Resources" could be dropped from the title as an alternative.

Page 9, Togiak Comprehensive Conservation Plan: The last sentence in this subsection incorrectly states that the CCP prohibits permanent commercial facilities on refuge lands. The Record of Decision signed by the FWS Regional Director on December 12, 1987, amends the CCP by allowing commercial fishing facilities on the refuge subject to reasonable regulations and the provisions in ANILCA.

Page 9, Last Paragraph, Existing Policy for Managing Federal and State Land and Waters Within the Refuge: A more complete reference is Section 14 "in Title VIII."

Page 14, Recreational Use Allocation System: The State is aware that FWS considered several options for awarding commercial recreational use contracts. We suggest that additional discussion of the considerations surrounding this issue be included in the plan to facilitate public understanding of the reasons for this significant provision.

Page 11, Public Use Goals and Objectives. The first paragraph acknowledges that the ANILCA enabling legislation for Togiak Refuge does not include purposes directly related to recreation, interpretive, or educational uses. Yet the PUMP goals and objectives are based on providing for "high-quality fish and wildlife oriented recreation, interpretive and educational opportunities consistent with the refuge's resource oriented purposes." The State supports these objectives, although we suggest that this section of the introduction further develop the link to the Refuge's purposes.

Page 22, Unit 2 - Kulukak River, Existing Public Use Characteristics: Dillingham and Aleknagik residents also conduct seasonal subsistence activities in this unit. Resources harvested from this unit include herring, clams, marine mammals, and waterfowl. The following report contains pertinent information:

John M. Wright and Molly Chythlook, 1985. Subsistence Harvests of Herring Spawn on Kelp in the Togiak District of Bristol Bay. Alaska Department of Fish and Game, Division of Subsistence Technical Paper No. 116.

Page 23, Unit 2 - Kulukak River, Proposed Management: Statements in the "Proposed Management" section for this and the other units refer to maintaining discrete anadromous fish runs and wild fishery stocks. Since this plan is distinct from the Fisheries Management Plan, such objectives should be re-stated with a human use orientation. It would also be valuable to explain the

relationship of this plan to the Fisheries Management Plan in the introductory section.

Page 28, Unit 3 - Upper Togiak River, Existing Public Use Characteristics: Residents of Manokotak also use this unit for subsistence purposes.

Pages 33-35, Unit 7 - Cape Peirce/Cape Newenham Proposed Management: Page 33 lists the "wasteful taking of marine mammals" as a management concern. Page 34 then calls on the FWS to "work with local villages to establish mutually supported guidelines for harvest of marine mammals." DFG would welcome further dialogue on the details of this management concern and of any proposed harvest guidelines that may be under development by the FWS.

The second paragraph on page 34 should indicate that an existing commercial herring fishery in this area is also of special management interest to the State.

The last paragraph beginning at the bottom of page 34 states that the FWS will work closely with DNR to close the tidelands to commercial fishing sites. This statement should also acknowledge the need for coordination with the Board of Fisheries. More detailed rationale for proposed closures of the existing commercial fishery, if needed, would be necessary before the Board would likely be able to act.

Page 45, Unit 12 - Upper Goodnews River, Existing Public Use Characteristics: Clarification is needed regarding the total number of guides currently operating in this unit.

Page 66, Water Quality. Alternative D refers to the development of "an effective visitor information program" to minimize impacts on water quality. This provision should be implemented regardless of which management alternative is selected.

Pages 66-67, Alternatives D - Balanced Use Scenario (Preferred), Effects on Anadromous Fish: A statement is made in this and the other alternatives that "allocation conflicts between user groups will continue to occur since a specific escapement goal has not been established, a sufficiently accurate forecast method has not been implemented, and inseason escapement monitoring is not available for most rivers and fish species in the refuge." This statement should be revised to acknowledge that many of these measurements and activities are being undertaken for a majority of the important refuge fish stocks. For example, salmon escapement goals have been established and are monitored for the following stocks: all species except pink salmon in the Kanektok and Goodnews Rivers and chinook, coho, and sockeye salmon in the Togiak and Kulukak Rivers. Although these measurements and

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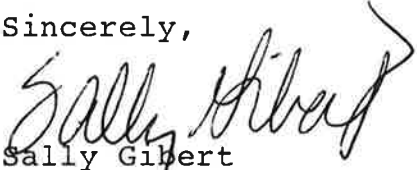
activities provide for greater fishery management precision, they will not necessarily resolve user group allocation conflicts.

Page 74, Mitigation: The reference in paragraph 1 regarding DFG responsibility for regulation of the fish harvest should also include responsibility for regulation of resident wildlife harvests. We suggest the Master Memorandum of Understanding between FWS and DFG also be cited in this paragraph.

Page 75, Appendix A: The State recommends including a summary of the results of public input collected from the FWS workbooks on alternatives.

Thank you for the opportunity to provide these comments which we believe will help make the upcoming public review phase more productive. If we can be of assistance in clarifying our comments, please do not hesitate to contact this office. State agencies look forward to the results of the public review of this document.

Sincerely,


Sally Gibert
State CSU Coordinator

Attachments

cc: Dave Fisher, Togiak Refuge Manager, Dillingham
Dave Menke, FWS, Kodiak
Mikel Haase, FWS, Anchorage

Attachment I

Proposed Public Use Sites for Inclusion
in the Togiak Public Review Draft

<u>MAP #</u>	<u>DESCRIPTION</u>
<u>Sites in Unit 4, Lower Togiak River</u>	
1	Aircraft parking/loading/unloading
2	Fishing access
3	Fishing site
4	Fishing site
5	Fishing site
6	Fishing access; Aircraft parking/loading/unloading
7	Fishing site
8	Fishing access
9	Aircraft parking/loading/unloading
10	Fishing site
11	Aircraft parking/loading/unloading
12	Aircraft landing area/loading/unloading
13	Aircraft landing area/loading/unloading
14	Fishing site
15	Fishing site
16	Fishing site
17	Aircraft pick-up/drop-off
<u>Site in Unit 5, Upper Togiak River</u>	
18	DFG/FWS camp site; Public aircraft access: loading and unloading

PUBLIC USE SITES
Units 4 and 5
Preliminary

↗ Aircraft/Boat
Transfer Areas

⊗ Major
Sport Fishing
Location

(Refers to State-owned
shorelands only)

T12 S
T13 S

Landing Field
Togiak

R66 W
R65 W

TOGIAK

Togiak

Nemes

PUBLIC USE SITES
Units 4 and 5
Preliminary

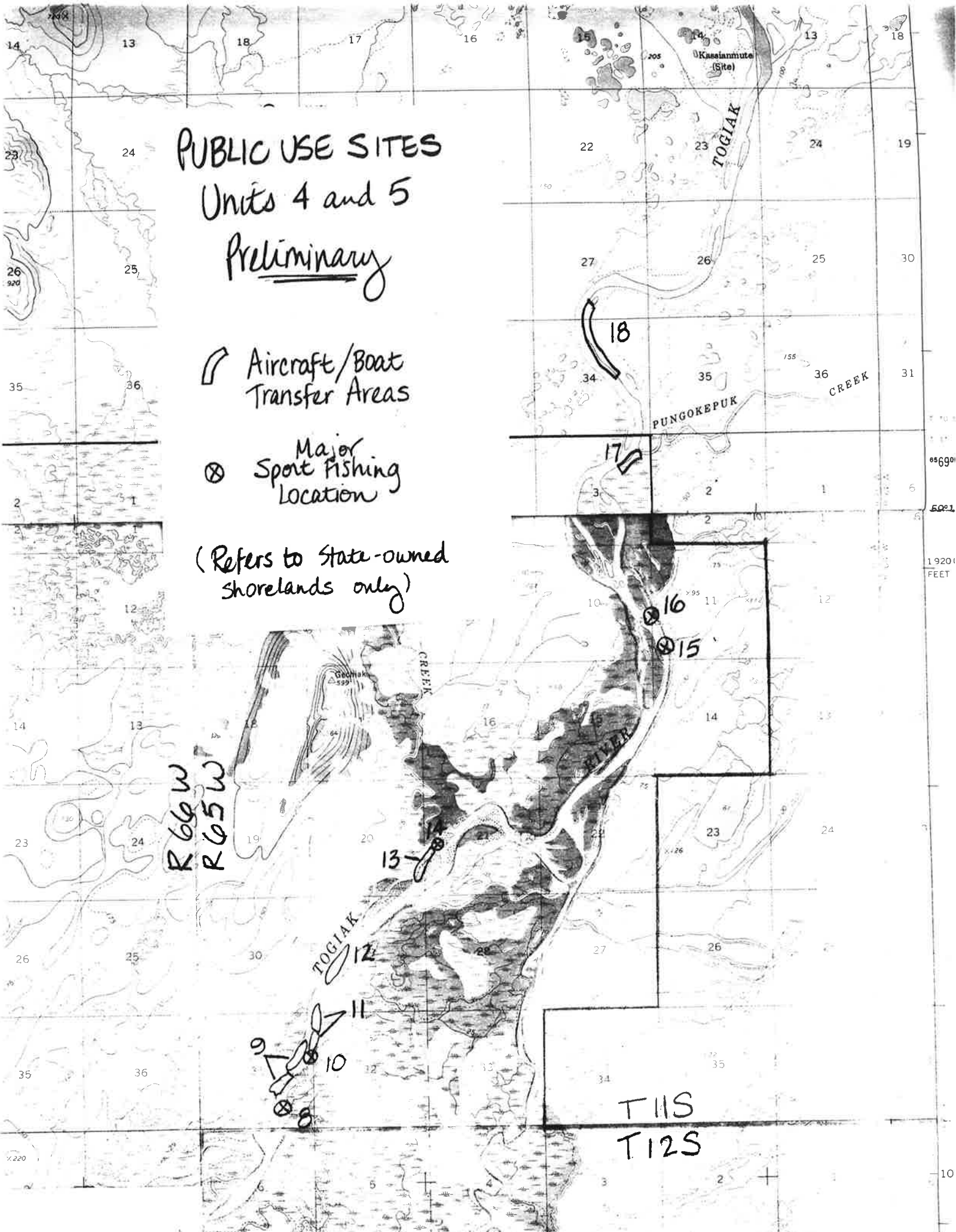
↷ Aircraft/Boat
Transfer Areas

⊗ Major
Sport Fishing
Location

(Refers to State-owned
shorelands only)

R 66 W
R 65 W

T 11 S
T 12 S



ATTACHMENT II

Examples of public uses not addressed in the Togiak Refuge step-down plan:

- Sport Hunting: Compared to many parts of the state, sport hunting is not a major public use on the refuge at this time. However, most of the refuge was identified in the CCP as a popular, high use area for brown bear hunting. An area of some 100 square miles around Kagati Lake was identified as a popular, high use area for moose hunting. Jacksmith, Chagvan, and Nanvak bays, the mouth of the Osviak River, and the southern and eastern coastline of the Nushagak Peninsula were identified as popular, high use areas for waterfowl hunting. As areas near the more populated areas of the state receive more hunting pressure and more sport hunters are willing to pay for remote and scenic hunting trips, the refuge will continue to grow in popularity. Therefore, sport hunting should be addressed in a step-down plan.
- Conflicts Between Public Uses: Despite its current, relatively low level of use by sport hunters, the Togiak Refuge hosts sport hunting and subsistence hunting and trapping issues that rival some of the sport fishing issues discussed in the current plan.
- Goose Management: Half of the world's black brant and most of the North American west coast emperor goose, king eider, and Steller's eider populations stage in Chagvan and Nanvak bays. Subsistence and recreational harvest of these waterfowl in spring is a nationally significant public use issue that should be addressed in a step-down plan. While some data on subsistence harvests have been collected on the Yukon-Kuskokwim Delta, no concrete data are available from the Togiak Refuge. This issue should be acknowledged in other step-down plans along with the need to acquire harvest data.
- Caribou Management: Caribou were transplanted to the Togiak refuge to provide public hunting opportunities. Managing the harvest of caribou, particularly in the Kilbuck Mountains, is a significant public issue that should be recognized in a step-down plan.
- Furbearers vs. Fish: Apparently the communities in and adjacent to the refuge are split on whether to control beaver populations because they block fish migration or maintain a high beaver population for trapping. This is a significant public use issue that overlaps trapping with sport, subsistence, and commercial fishing uses of the refuge. It should be addressed in a step-down plan.

DISTRIBUTION LIST

July 6, 1989

- [1372] Mr. Al Carson, Department of Fish and Game Habitat Division, Anchorage
- [1636] Mr. Joe Chythlook, Board of Fisheries, Dillingham
- [942] Ms. Tina Cuning, Department of Fish and Game, Nome
- [1635] Ms. Shocky Greenberg, Juneau
- [1419] Mr. Terry Haynes, Department of Fish and Game Subsistence Division, Fairbanks
- [1639] Mr. Steve Jacoby, Division of Governmental Coordination, Juneau
- [1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
- [1258] Mr. Craig Lindh, Division of Governmental Coordination, Juneau
- [469] Mr. Jim Powell, Department of Natural Resources, Juneau
- [1588] Mr. C. Rankin, Department of Public Safety Fish and Wildlife Protection, Kodiak
- [70] Mr. Ron Regnart, Department of Fish and Game Habitat Division, Anchorage
- [1185] Mr. Ron Swanson, Division of Land and Water Management Resources Allocation
Section, Anchorage
- [1239] Mr. Rob Walkinshaw, Department of Natural Resources Resources Allocation Section,
Anchorage
- [1240] Mr. Dan Wilkerson, Department of Environmental Conservation, Anchorage