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June 7, 1993

Anthony R. DeGrange
Marine Mammals Management
U.S. Fish and Wildlife Service
4230 University Drive, Suite 310
Anchorage, AK 99508

Dear Mr. DeGrange:

The State of Alaska has reviewed the Draft Final Management Plan for the Sea Otter in Alaska. This letter represents the consolidated comments of the State's resource agencies.

During the previous public comment period, Commissioner Carl Rosier of the Alaska Department of Fish and Game (ADF&G) provided comments to the U.S. Fish and Wildlife (FWS) on the draft management plans for polar bear, walrus, and sea otter in Alaska. In those comments, ADF&G noted that the plans should be strategic documents, and should not be directly tied to Marine Mammal Protection Act (MMPA) amendments that the FWS is proposing. Unfortunately, the plans are still written in such a way that they will become outdated as soon as the MMPA reauthorization is completed. The FWS should seriously consider revising the documents and producing separate conservation plans and management option papers for each species.

Our previous comments about State ownership of tidelands, shorelands, submerged lands and watercolumns in Alaska are also still applicable. Based on a brief review of the Sea Otter Management Plan, we found no references to State land plans and authorities as requested. We again request recognition of these issues in the final plan.

Specific Comments on Draft Final Sea Otter Management Plan

Page 17, item 31--This section should be reworked to directly state what needs to be done and how it should be accomplished.

Pages 19-20, item 41--This section has three sub-items that deal with take of otters during commercial fishing operations. While it is true that the level of take is probably biologically insignificant, the MMPA requires progress toward the goal of a zero mortality rate. Therefore, items 412 and 413 should be dealt with regardless of the results from 411. Item 411 could be removed or combined with 412.

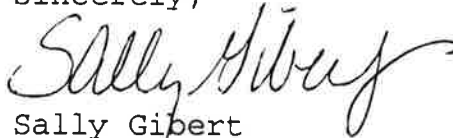
Page 28, item 535--As noted previously, it is not clear why the MMPA needs to be amended to direct FWS to develop information and education programs.

Page 29, item 54--As noted previously, it would be better not to include amendment of the MMPA to allow regulation of Alaska Native harvest as part of the management plan. FWS should emphasize development of cooperative management programs with Alaska Native groups (e.g., the Alaska Sea Otter Commission). If cooperative efforts fail to provide for effective conservation of sea otters in Alaska, then FWS should ask for regulatory authority under MMPA provisions.

Page 29-30, item 58--The NMFS attempt to develop guidelines for approaching pinnipeds and cetaceans has resulted in much debate and little progress. FWS should very carefully evaluate whether sea otter approach guidelines are necessary and practical before beginning the process of developing them.

Thank you for the opportunity to provide these comments. If clarification is needed on any of the technical concerns, please feel free to contact Lloyd Lowry in the Fairbanks office of DFG at 456-5156.

Sincerely,



Sally Gibert
State CSU Coordinator

cc:

Carl Rosier, Commissioner, Department of Fish and Game
Glenn Olds, Commissioner, Department of Natural Resources
John Sandor, Commissioner, Department of Environmental
Conservation

Bruce Campbell, Commissioner, Department of Transportation and
Public Facilities

Richard Burton, Commissioner, Department of Public Safety

John Katz, Governor's Office, Washington, D.C.