

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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October 14, 1988

Mr. Walter Stieglitz
Regional Director
U.S. Fish and Wildlife Service
1011 E. Tudor Road
Anchorage, AK 99503

Dear Mr. ~~Stieglitz~~ ^{Walt}:

The State of Alaska has completed its review of the final Supplemental Environmental Impact Statement (SEIS) and Wilderness Recommendation for the Kenai National Wildlife Refuge. As discussed in more detail in the state's comments on the draft, dated July 22, 1988, the state continues to oppose this wilderness recommendation on the basis that designation of the additional wilderness would:

- ° prohibit oil and gas leasing and exploration within the designated areas which may have significant oil and gas potential;
- ° inhibit construction of the planned Anchorage-Bradley Lake transmission line intertie; and
- ° preclude additional opportunities for recreational development in an area of high demand.

Therefore the state urges the U.S. Fish and Wildlife Service (FWS) to select the No Action (no new wilderness) Alternative in the Record of Decision (ROD) for this proposal.

In addition, the state requests that the ROD address the following remaining issues, regardless of which alternative is selected.

Subsistence

The state acknowledges that no subsistence use has been specifically identified on the Kenai Refuge. However, we reiterate our request that the ROD recognize that subsistence is a major purpose (priority use) of all federal lands in Alaska. At the state's request, such recognition was added to the ROD (Item 8) for the Kenai Comprehensive Conservation Plan (CCP). For the consistency purposes, we again request that the following

language, as it appears in the CCP ROD, be included in the current ROD:

Although the FWS considers hunting and fishing to be primarily recreational activities on the Kenai Refuge, Title VIII of ANILCA established subsistence as a priority use of fish and wildlife resources on all federal land in Alaska.

Habitat Manipulation

In the state's comments on the draft SEIS, we expressed concern about the appearance of an arbitrary acreage ceiling on the use of mechanical manipulation in Moderate Management areas. No change was made in the final SEIS, and there was no substantive response to our original comment. Based on recent conversations with the FWS planning staff, the SEIS does not intend the 40,000 acre limit as a ceiling, but is rather an estimate based on terrain constraints. To confirm this point, we reiterate our request that the ROD contain the following (or similar) language to modify the last paragraph on page 84 of the SEIS:

"Mechanical manipulation is currently impractical to employ on approximately half of the moderate management area due to terrain and vegetation limitations."


Cabins

In response to the state's request for additional policy clarification regarding cabins, the final SEIS indicates that the FWS feels it is not necessary to include "generic" cabin language from recent CCPs. (See number 7 on page 153 of final SEIS.) We disagree with this approach. Any document which discusses cabins should do so in the context of the FWS' current cabin policy. We request reconsideration of our original comment, including recognition that temporary facilities will be allowed. At a minimum, we request that the policy clarifications in the FWS response to comments be included in the ROD.

Thank you for the opportunity to comment. If you have any questions, please feel free to call this office.

Sincerely,

Robert L. Grogan


By Sally Gibert
CSU Coordinator

Mr. Walter Stieglitz

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October 14, 1988

cc: Commissioner Brady, DNR
Commissioner Collinsworth, DFG
Commissioner Hickey, DOT/PF
Commissioner Kelso, DEC
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Mr. Rod Swope, Office of the Governor
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