STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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October 31, 1988

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

Dear Mr. Stieglitz:

The State of Alaska has completed its review of the U.S. Fish and Wildlife Service (FWS) final Supplemental Environmental Impact Statements (SEISs) and Wilderness Recommendations for the Alaska Peninsula and Becharof National Wildlife Refuges. As indicated in the state's August 12, 1988, and August 29, 1988, comments on the draft SEISs, the state does not object, from a substantive standpoint, to the Wilderness recommendations for these refuges. We do, however, have a couple of procedural concerns with the SEISs, which are described below.

Wilderness Issues

On three occasions (May 12, 1988, August 12, 1988, and August 29, 1988) the state provided the FWS with a list of potential refuge uses, activities, and structures that could be affected by Wilderness designation. The state asked the FWS to identify which, if any, of these uses occur in the areas proposed for Wilderness designation in the Alaska Peninsula and Becharof refuges. We further asked that where these uses do occur, that the FWS clearly describe the effect Wilderness will have on them.

On each occasion, the FWS failed to provide the requested information. We regret that this is the case. We believe this information would have helped the public evaluate the costs and benefits of designating Wilderness.

EIS Format

Although we recognize that the FWS is under a tight deadline to complete these SEISs, we believe the format of the final documents is less than satisfying. Instead of preparing final EISs, the FWS has provided errata sheets which must be attached to the draft SEISs. We believe this format is cumbersome and suggest that it be avoided in the future.

Oil and Gas

As indicated in the state's Five Year Oil and Gas Leasing Program, the state has tentatively scheduled an oil and gas lease sale (Sale 56) for 1989. For your information, some of the lands scheduled for sale are adjacent to one area proposed for wilderness in the Alaska Peninsula refuge (the Pavlof Unit).

On behalf of the State of Alaska, thank you for the opportunity to review these final SEISs.

Sincerely,

Robert L. Grogan

Director

By Michelle Sydeman State CSU Coordinator

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