

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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August 12, 1988

Mr. Walter O. Stieglitz  
Regional Director  
U.S. Fish and Wildlife Service  
1011 East Tudor Road  
Anchorage, Alaska 99503

Dear Mr. *Walt* Stieglitz:

The State of Alaska has reviewed the U.S. Fish and Wildlife Service (FWS) Draft Supplemental Environmental Impact Statement (EIS) and **Wilderness** Proposal for the **Becharof** National Wildlife Refuge. The following letter is submitted on behalf of state agencies and represents a consolidation of state concerns and comments.

The State of Alaska recognizes that Wilderness has a legitimate place in the range of public land use classifications which exist in Alaska. Based on the resource inventory and analyses compiled during development of the Bristol Bay Cooperative Management Planning Process, the state believes that the proposed Wilderness recommendation for the Becharof Refuge is appropriate. This cooperative state/federal planning effort considered most of the following Wilderness review criteria that the state is currently using to review both park and refuge Wilderness proposals. Each of these criteria should also be addressed in the EIS.

### Criteria

1. Areas where Wilderness designation would eliminate, reduce or restrict existing uses, structures or activities that are allowed by the Alaska National Interest Lands Conservation Act (ANILCA) and are not degrading resource values;
2. Areas where there is a current or foreseeable interest in or need for:
  - a) FWS visitor facilities or recreational development (e.g., visitor centers, campgrounds, trails, lodges, public use cabins);
  - b) developed access (e.g., roads, airstrips, docks, helicopter landing sites);
  - c) state or federal administrative/management facilities (e.g., ranger stations, air/water quality monitoring stations, research facilities);

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- d) utility corridors or facilities (e.g., pipelines, power transmission lines, remote communications equipment);
  - e) habitat manipulation or permanent fisheries improvement facilities;
  - f) mariculture, commercial fishing, and/or oil and gas support facilities;
  - g) core sampling or seismic studies;
  - h) hydroelectric or geothermal development;
  - i) sand and gravel removal;
  - j) commercial timber harvest;
  - k) oil and gas leasing.
3. Areas with valid and/or patented mining claims;
  4. Areas that have reasonable potential for inclusion in land exchanges or where unit boundaries are in dispute;
  5. Areas where cabins or other structures are used for commercial (e.g., guiding or commercial fishing) or residential purposes;
  6. Areas where mechanized equipment (e.g., chainsaws, generators) has traditionally been used to support commercial, recreational, subsistence, or management activities;
  7. Areas immediately adjacent to roads, mining activity, recreational facilities, land with oil and gas potential or existing leases, or other existing or proposed development;
  8. Areas where off-road vehicles have been traditionally used; and,
  9. Areas immediately adjacent to state lands, navigable waterbodies, submerged lands, tidelands, and possible Revised Statute (RS) 2477 rights-of-way.

PAGE-SPECIFIC COMMENTS

Page 3. The lead-in sentence to the Purposes section refers to "the following major purposes for which the Becharof Refuge was established . . .". We request that this sentence be revised to more closely parallel ANILCA, i.e., "sets forth the purposes for

which Becharof Refuge was established and shall be managed. These include . . .".

Page 6. Paragraph 1 addresses mechanized equipment in Wilderness. The statement "use of chainsaws is permitted only for traditional uses in Wilderness" is correct. References later in the EIS, however, restrict chainsaws only to subsistence uses or indicate they are not allowed in Wilderness altogether (pp. 18, 88, 91). Similarly, the EIS states that generators are not allowed in Wilderness areas. The EIS then states that few persons are involved in hunting and fishing activities that use such equipment and, therefore, will not be significantly affected. We disagree. For example, a guide with a lodge facility that uses a generator for lights, refrigeration, etc. will be significantly affected. Similarly, there could be impacts to fishing support facilities. We believe the Alaska Land Use Council's 11-24-87 recommendations to the FWS should be reflected in these various policy statements.

Pages 10-19. The Proposed Action includes designating Wilderness along Portage Bay. This bay may be used by commercial fishermen for various support activities, although no such use is recognized in the text. We therefore request assurance that the proposed Wilderness designation will not affect access and existing uses of the area between Portage Bay and Becharof Lake, including Bear Creek and the lake itself. We also request that the Proposed Action alternative address the proposed dock facilities near Kanatak Village and at Becharof Lake. If the Wilderness designation will preclude these developments, impacts on the community's future should also be addressed.

Page 45, "Mammals". This paragraph contains the following statement: "Wolves are wide-ranging but because of their secretive habits, their status is uncertain". Studies to determine actual numbers, productivity, food habits, etc. have not been done in the area, however their status is generally monitored by the Alaska Department of Fish and Game (DFG) on a routine basis. We request this sentence be deleted.

Page 50, Way of Life -- Subsistence Orientation. The state does not concur with the following unsubstantiated statement: "subsistence seems to be more a matter of preference than a need for most local residents." The high use of subsistence resources described in the second paragraph is associated with both dietary preference and economic factors. The second and third paragraphs should be rewritten to reflect that subsistence is, and will remain, an important economic activity as well as having social and cultural significance.

Page 51, Perceptions, Values, and Response to Change. We request revision of the second and third sentences in the third

paragraph. There are numerous reasons why some rural Alaskans "have difficulty accepting change" that are not discussed in this section. In addition, many, if not most, local residents are already directly or indirectly involved in commercial fishing. Furthermore, we suggest that the last sentence in the third paragraph be deleted. If this paragraph is not revised, we request that appropriate documentation be provided.

Page 52, third paragraph. There also is a public school located in South Naknek.

Page 52, Local Economy. This section begins with the sentence: "Many local residents have year-round jobs in the Borough's relatively diversified economy." We suggest that the FWS re-evaluate this statement since employment opportunities in Naknek and South Naknek are highly seasonal. Also, we recommend that the EIS avoid such general statements as a "relatively diversified economy". Instead, the EIS should rely on specific information available in current reports, such as Judith M. Morris' "The Use of Fish and Wildlife Resources by Residents of the Bristol Bay Borough, Alaska" (DFG/ Division of Subsistence Technical Paper No. 123, Juneau, 1985). This report may also include relevant information for use in the "Subsistence" section of the EIS and should be cited in the bibliography.

Pages 55-62, Subsistence. This section is generally informative and accurate. However, we request that the final EIS contain maps of subsistence use similar to maps presented for recreational hunting and sport fishing. Maps depicting subsistence resource harvest areas for the target communities are available in the Alaska Habitat Management Guide, Southwest Region Map Atlas (DFG, 1985).

Page 58, first paragraph. As noted in the EIS, residents of King Salmon and Naknek use vehicles for hunting in the northern portion of the refuge. We request that the final EIS specify how this mode of access would be affected by wilderness designation, since "vehicles" are not specifically authorized in Section 1110(a) of ANILCA. (See "Access" on page 7.)

Pages 75-76. Nowhere in the discussion of the Wilderness Act is there reference to the fact that ANILCA effectively amended the Wilderness Act and provides guidelines for Wilderness in Alaska that differ from the "lower 48". We request that appropriate recognition be inserted.

ANILCA Section 810 Evaluation. The state notes that no ANILCA Section 810 Analysis accompanies this document. In the years since the Comprehensive Conservation Plan was written, new information has become available regarding subsistence. Based on

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this new data and the analyses presented in this document, we request that an updated 810 Analysis accompany the final EIS.

On behalf of the State of Alaska, thank you for the opportunity to review this draft EIS. If we can be of assistance in clarifying the state's comments, please do not hesitate to call this office.

Sincerely,

Robert L. Grogan  
Director



By Sally Gibert  
State CSU Coordinator

cc: Commissioner Judy Brady, DNR  
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