

May 31, 1988

William Knauer
U.S. Fish and Wildlife Service
1011 E. Tudor Road
Anchorage, Alaska 99503

Dear Mr. Knauer:

The Pacific Seabird Group is a scientific organization composed of over 400 seabird researchers and conservationists from 16 countries. Our group is dedicated to the study of Pacific seabirds and their environment. While our group is primarily interested in scientific endeavors, we have a conservation committee and feel we have a tremendous amount of relevant expertise to offer concerning conservation issues. This letter presents our comments on the draft Alaska Maritime National Wildlife Refuge Comprehensive Conservation Plan.

The wilderness designation portion of the plan is the most significant part. We favor the more extensive wilderness of Alternative B, as this designation offers the best protection for nesting colonies. Considering the vastness of the Refuge, adding more wilderness in the future could be difficult.

We are disappointed that Refuge lands which are Native selected but not conveyed are not included in your wilderness proposal. In actuality, only a very small percentage of these selections will ever be conveyed due to extensive over-selection by the Natives. These over-selections include some of the most magnificent and important Refuge islands (e.g., Barren Islands, Shumagin Islands).

We recommend that a list of lands that the Refuge feels are of high priority for acquisition be included in the plans. Also, a list of lands already in the Refuge with low wildlife value and suitable for exchange should be added. We would like to review these lists and feel that they would be helpful in the future as a guide for management of land exchanges.

We prefer the Refuge staffing pattern and visitor center as portrayed under Alternative C. This alternative, providing for the largest staff, still seems highly conservative. Having one biologist assigned to an area as large as the Aleutian Islands or Bering Sea is inadequate for simply monitoring populations of wildlife, let alone determining causes of declines.

We thank you for the opportunity to comment on the Alaska Maritime National Wildlife Refuge draft comprehensive plan, and we wish you the best of success with its implementation. We are particularly interested in this Refuge and will be glad to offer our further comments in any future public reviews.

Sincerely,

Scott A. Hatch
Chair

cc: Chair, Conservation Committee

HATCH/sr 5-31-88