

BRISTOL BAY CRSA
Box 849
DILLINGHAM, AK 99576
907. 842. 2666/FAX 907. 842. 2776.
BBCRSANT@NUSHTEL.COM

August 25, 2003

Mr. David Kaiser
Federal Consistency Coordinator
Coastal Programs Division, Office of Ocean and Coastal Resource Management
National Oceanic and Atmospheric Administration
1305 East-West Highway, 11th Floor
Silver Spring, MD 20910

RE: CZMA Federal Consistency Regulations, 15 CFR Part 930
Proposed Rule, 68 Federal Register 34851

Mr. Kaiser:

The Bristol Bay Coastal Resource Area, based in Dillingham, Alaska, opposes the proposed rule changes to the Coastal Zone Management Act referenced above and endorses the assessment made and submitted by the Coastal States Organization.

The Bristol Bay CRSA has within its boundaries 400 miles of coastline plus anadromous rivers and streams stretching far inland that support one of nature's great migrations, the annual return of millions of sockeye salmon to their natal streams and lakes. Consequently we have historically been extremely wary of anything that could jeopardize this miracle of nature.

We occupy the bottom of the CZMA chain but, we think, we are the very place for which the Coastal Zone Management Act was written. We are the point of contact where the affects of a proposed development meet reality. We are a local district, one that could ultimately pay the price wrought by these changes proposed so far away in Washington, D.C.

We have recently been through a similar reworking of coastal management within our own state that is centralizing coastal management powers in one state agency, much as these proposed rules would take power from the states and centralize it in the Department of the Interior. In combination, these changes further isolate the local districts, making us more vulnerable to forces greater than ourselves. These changes contravene the spirit and practice of the Coastal Zone Management Act.

Typically, what makes people in this region nervous is the suggestion of offshore drilling for oil – just the sort of work that the rule changes would affect, and for the worse, in our opinion. These proposed rules appear to us short-sighted and narrowly focused: By accelerating timelines; de-emphasizing working with the states on matters of local concern; limiting states' rights in reviewing existing federal projects and activities that would likely affect coastal resources; and in limiting the states' ability to seek additional information when necessary, you seem to be inviting delay through confusion and contention.

The law as written balances various interests, as intended, and if altered, should be along the lines suggested by the CSO. Thank you for the opportunity to comment.

Andrew deValpine

Director, Bristol Bay CRSA

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