

August 22, 2003

From: Lake and Peninsula Borough
PO Box 311
King Salmon, AK 99613

Subject: Proposed change to 15 CFR Part 930 Coastal Zone Management Act Federal Consistency Review

TO: Mr. David Kaiser
Federal Consistency Coordinator
Coastal Programs Division
Office of Ocean and Coastal Resource Management; NOAA
1305 East-West Highway; 11th Floor
Silver Spring, MD 20910

Dear Mr. Kaiser,

The purpose of this letter is to comment on the proposed rule published in the *Federal Register* on June 11, 2003 in which the National Oceanic and Atmospheric Administration (NOAA) proposed changes to sections of the Coastal Zone Management Act (CZMA) Federal Consistency regulations.

The Lake and Peninsula Borough encompasses approximately 23,782 square miles of land (roughly the size of West Virginia) and 7,125 square miles of water, extending 400 miles from Lake Clark in the north to Ivanof Bay in the south. There are 17 villages within the Borough all located on the Alaska Coastline or on major fresh water lakes within the Borough. Within the Borough there are three National Parks (Lake Clark National Park & Preserve, Katmai National Park & Preserve and Aniakchak National Monument & Preserve); two National Wildlife Refuges (Becharof NWR and the Alaska Peninsula NWR); and numerous designated Wild and Scenic Rivers and State Critical Habitat Areas. Through the federal, state, and local partnerships created by the CZMA and the Alaska Coastal Management Program (ACMP), the Lake and Peninsula Borough currently participates in the management of Alaska's coastal resources. This opportunity for participation is highly valued and frequently utilized by the Borough as we are directly involved in coastal consistency reviews within our Borough and bordering Boroughs and Coastal Resource Service Areas consistency reviews that could affect the Borough.

The proposed rule would (1) make federal agencies the experts on environmental impacts to a state's coastline; (2) exempt some major oil and gas proposals from state review; and (3) give greater weight to the opinion of federal agencies, thereby eliminating the historical deference given to states and local governments such as our Borough. Due to the partnerships inherent in the CZMA and ACMP, these changes would significantly reduce state, and by default local, participation in the management of Alaska's coastal resources. The Lake and Peninsula Borough strongly supports resource and economic development in our Borough and the Bristol Bay region, but do not believe that this development should be at the expense of state and local participation. After all, when it comes to resource development in the State of Alaska and our Borough, Alaskans are in the best position to

determine which proposals are the most economically viable and least beneficial/detrimental to the surrounding communities.

Therefore, the Lake and Peninsula Borough strongly urges you to withdraw the proposed rule changes. Thank you for your time and consideration.

Sincerely,

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