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February 24, 2010

Kaja Brix, Ass't Regional Administrator
Protected Resources Division
Alaska Region NMFS
P.O. Box 21668
Juneau, AK 99802

RE: RIN 0648-XT72, Cook Inlet Critical Habitat Designation

Dear Ms. Brix:

I am writing to oppose the designation of 3,000 square miles of Central Alaska's Cook Inlet as critical habitat for the beluga whale. Such a designation appears to reflect a failure of NMFS to differentiate between whale habitat and that habitat that is truly critical to the survival of the species. In addition, the decision to list the whale is based upon a problematic estimate of beluga population.

NMFS research concludes that the decline in beluga population in Cook Inlet is totally a function of the unsustainable subsistence harvest of the 1990's. The threat has now been eliminated and the whale population appears to be rebounding within biological limitations.

Industrial and community activities in the Inlet have not been identified as a threat to the recovery of the beluga. The greatest threat would appear to be predation by orca and grounding; neither of which can be addressed nor resolved by a critical habitat designation.

The designation of Cook Inlet as a critical habitat will have a profound impact upon the economy of Southcentral Alaska and I urge you to engage in a defensible cost benefit analysis of such impacts. NMFS cost estimate of these impacts at \$600,000 over the next ten years is totally inadequate.

Sincerely,



Paul S. Glavinovich