

Kaja Brix, Assistant Regional Administrator,
Protected Resources Division
Alaska Region NMFS
Attn: Ellen Sebastian

RE: Comments 'RIN 0648-XT72'

Dear Ms. Sebastian:

Please accept my comments that dispute the NMFS designation of Cook Inlet as critical habitat. The ESA requires NMFS to designate areas as critical habitat that are truly "essential to the conservation of the species". NMFS has not demonstrated that Cook Inlet is essential to conserve the beluga whales. I have seen photographs of beluga whales in China.

It appears that NMFS is demonstrating a knee-jerk reaction that mirrors the global warming mantra and does not have scientific information to accurately designate Cook Inlet as critical habitat. What methodology and what proof has been documented to demonstrate which is critical habitat and which part of Cook Inlet should be considered general habitat?

Consideration of economic effects should be accounted for in designating the Cook Inlet as critical habitat for beluga whales. NMFS has blatantly disregarded the requirement to conduct an accurate and detailed economic analysis of Cook Inlet and the disastrous economic effects that will occur to humans also inhabiting Alaska.

Industry in and around Cook Inlet already complies with regulatory oversight and requirements as well as onerous and expensive mitigation in place to protect beluga whales. Shipping of basic items required for humans, oil and gas exploration, development and production that is critical to our nation would be even more difficult, less profitable and unlikely to occur due to increased costs and unpredictable governmental requirements. Other resources that are vital to Alaska residents include renewable energy, commercial and industrial coastal development, commercial and sport fishing, military defense operations, and infrastructure including two critical ports.

It is unreasonable to jeopardize national security by designating Cook Inlet as critical habitat.

Alaskans already have higher costs for goods. Additional restrictions imposed from faulty NMFS scientific studies will obviously result in even higher costs for rural Alaska residents who are burdened with extreme prices.

Gas and electricity produced natural gas is produced in Cook Inlet. This critical habitat designation will likely further limit future oil and gas exploration and development. Again, Alaskans would bear the burden of higher prices for heat and electricity.

Electric utilities and the natural gas distributor for Southcentral would have to pass the costs to consumers for added discharges treatment.

Lost development opportunities would harm the State of Alaska financially with impacts of its residents.

It is astounding that NMFS scientists blamed the beluga whale population decline in Cook Inlet on over-hunting during the 1990s and did not identify any community or other activity that was responsible for the tragic and poorly managed subsistence hunting.

NMFS stated: "No information exists that beluga habitat has been modified or curtailed to an extent that it is likely to have caused the population declines observed within Cook Inlet." Based on this statement alone, NMFS proposed designation is tantamount to management irresponsibility.

NMFS should develop a more rational approach - find a way to control beluga "take" by hunters and enlist the aid of other resource agencies, both state and federal, to MANAGE the beluga population to growth and sustainability. I have read that aerial surveys count the belugas that are seen on the surface of the water and obviously are unaware of and cannot count the belugas that are UNDER the water at a rate of 5 whales on the surface with up to eleven whales beneath the water surface when observed.

Finally, a Tyonek representative told me that the beluga decline is because of the decline of salmon that the whales feed on.

Let's get some real and unbiased scientific work on this issue. I encourage you to seek help in preparing unbiased documentation.

Kaye Laughlin . 10719 Tradition Avenue . Eagle River, Alaska 99577