



31 August 2005

Mr. Jerry Brabander
Field Supervisor
U.S. Fish and Wildlife Service
Oklahoma Ecological Field Services Office
222 South Houston
Tulsa, OK 74127-8909

RE: Comments on the Proposed Designation of Critical Habitat for the Arkansas River Basin Population of the Arkansas River Shiner

Dear Mr. Brabander:

Our Firm serves as legal counsel to the Arkansas River Shiner Coalition (the "Coalition"). Please find enclosed the Coalition's comments on the proposed designation of critical habitat for the shiner and the associated draft economic analysis. The Coalition's submittal includes the following items:

1. Master set of comments on legal issues and other matters of concern;
2. A roster of Coalition members (Exhibit A);
3. Comments on the economic analysis prepared by David Sunding, Ph.D., of the University of California at Berkeley (Exhibit B);
4. Comments on the economic analysis prepared by John Williams of the Canadian River Municipal Water Authority (Exhibit C);
5. the Management Plan for Unit 1a coordinated by the Canadian River Municipal Water Authority (Exhibit D);
6. the Management Plan for Units 1b and 3 coordinated by the Oklahoma Farm Bureau Legal Foundation (Exhibit E); and
7. Comments on the proposed designation and economic analysis prepared by the Oklahoma Independent Petroleum Association (Exhibit F).

If the Service has any questions regarding the Coalition's comments or any of the enclosed materials, please contact me at your convenience at the phone number or e-mail address listed above.

Very truly yours,

A handwritten signature in black ink, appearing to read 'C. M. Douglas', followed by a horizontal line extending to the right.

Craig M. Douglas

Enclosures

cc: Coalition Executive Committee