# STATE OF ALASKA CITIZENS' ADVISORY COMMISSION ON FEDERAL AREAS

## 2014 ANNUAL REPORT



DEPARTMENT OF NATURAL RESOURCES 101 AIRPORT ROAD PALMER, AK 99645

## **INTRODUCTION**

This Annual Report provides an overview of the activities of the Citizens' Advisory Commission on Federal Areas during 2014. The Commission held its regular meetings in Juneau, Fairbanks and Anchorage, and commented on a variety of federal actions with the potential to impact Alaskans and their interests. More information on comment letters and recommendations submitted by the Commission is provided below, by agency or topic.

Commissioners and staff also initiated and participated in a number of public outreach opportunities and follow-up to the Commission's August 2013 Federal Overreach Summit.

In August, the Commission's Executive Director, Stan Leaphart, retired after being staff to the Commission since its establishment. In September, the Commission appointed a new Executive Director, Sara Taylor, and relocated its office from Fairbanks to Palmer.

## **BACKGROUND**

The Citizens' Advisory Commission on Federal Areas was established originally in 1981 as a temporary advisory agency in the executive branch of the state. Its purpose was to provide assistance to the citizens of Alaska affected by the management of federal lands within the state. The original Commission operated from 1982 until funding was eliminated in 1999.

The Commission was reestablished in 2007 by the Alaska State Legislature and resumed full operations in July 2008. The Commission is attached administratively to the Department of Natural Resources, Office of the Commissioner, but operates independently of the department. Its purpose, duties and responsibilities remain unchanged from the original and are outlined below.

## **DUTIES OF THE COMMISSION**

The duties and responsibilities of the Commission are contained in AS 41.37.220:

(a) The commission shall consider research and hold hearings on the consistency with federal law and congressional intent on management, operation, planning, development and additions to federal management areas in the state.

- (b) The commission shall consider research and hold hearings on the effect of federal regulations and federal management decisions on the people of the state.
- (c) The commission may, after consideration of the public policy concerns under (a) and (b) of this section, make a recommendation on the concerns identified under (a) and (b) of this section to an agency of the state or to the agency of the United States which manages federal land in the state.
- The commission shall consider the views, research, and reports of advisory groups established by it under AS 41.37.230 as well as the views, research, and reports of individuals and other groups in the state.
- (e) The commission shall establish internal procedures for the management of the responsibilities granted to it under this chapter.
- (f) The commission shall report annually to the governor and the legislature within the first 10 days of a regular legislative session.
- (g) The commission shall cooperate with each department or agency of the state or with a state board or commission in the fulfillment of its duties.

The Commission also may establish advisory groups. Members of an advisory group must be broadly representative of individuals involved in activities affected by the establishment or management of units of federal land within the state.

Although the Commission's role is advisory, it is authorized by AS 41.37.240 to request the attorney general to file suit against a federal official or agency if the Commission determines that the federal agency or official is "acting in violation of an Act of Congress, congressional intent, or the best interests of the State of Alaska."

## **COMPOSITION**

The Commission is composed of twelve members, six appointed by the Governor and six appointed by the Legislature. Commission officers for 2012 were: Chairman, Rep Wes Keller (Wasilla) and Vice-Chairman, Mr. Mark Fish (Big Lake). The Chairman, Vice-Chairman and Mr. Rod Arno (Wasilla) and Mr. Charlie Lean (Nome) comprise the Commission's Executive Committee.

## 2014 MEMBERS

Rod Arno Mark Fish Sen. John Coghill North Pole (S) Willow (S) Anchorage (S)

Teresa Hanson Rep. Wes Keller Charlie Lean Fairbanks (G) Wasilla (H) Nome (G)

Kathleen Liska Mike Meekin Warren Olson Anchorage (G) Palmer (H) Anchorage (S)

Ron Somerville Frank Woods Susan Smith Juneau (H) Dillingham (G) Chokosna (G)

- (G) Governor's Appointment
- (S) Senate Appointment
- (H) House Appointment

## STAFF

The Commission currently has two staff positions: Executive Director, Sara Taylor, and Commission Assistant, Karrie Improte. The office is located in the Department of Natural Resources, 101 Airport Road, Palmer, AK 99645. The Commission Assistant is temporarily working out of the Commission's former Fairbanks location pending duty station transfer. PHONE (907) 451-2035. FAX (907) 451-2751. EMAIL dnr.cacfa@alaska.gov.

## NEWSLETTER

Commission staff produces a newsletter Alaska Lands Update that is distributed electronically to several hundred recipients each month. Printed copies are also distributed at the DNR Public Information Centers in Fairbanks, Anchorage and Juneau. Contact the Commission staff if you are interested in receiving the newsletter.

During 2014, due to an increased workload and staff changes, the Alaska Lands Update was issued quarterly instead of monthly. Monthly issuances will resume in 2015. For archived issues, please visit http://dnr.alaska.gov/commis/cacfa/newsletters2.html.

## **COMMISSION MEETINGS**

The Commission holds three regular meetings each year. The meetings are open to the public and testimony is accepted on any issue related to the management of federal public lands in Alaska. There are four public participation segments at each 2 day meeting and the public is provided a toll-free number to participate even if they are unable to attend the meeting. During 2014, regular Commission meetings were held in Juneau, Fairbanks and Minutes of the meetings are available on the Commission's website and any material distributed at the meetings is available to the public upon request.

In addition to the meetings, the Commission held a two day work session in Anchorage in January to refine the issues and recommendations identified at the 2013 Federal Overreach Summit and prior meetings.

## **COMMISSION ACTIVITIES IN 2014**

Following is an overview and summary of comments and recommendations submitted on the federal land management plans, regulations, policies and related issues the Commission addressed during 2014. The full text of all comments and correspondence, as well as previous annual reports, meeting minutes, the monthly newsletter and other information can be found at <a href="http://dnr.alaska.gov/commis/cacfa/">http://dnr.alaska.gov/commis/cacfa/</a>. Printed copies of all Commission documents may also be obtained from the Commission office at the address above.

### NATIONAL PARK SERVICE

#### National Park Service 2014 Compendiums

In January of each year, the National Park Service updates the compendium for each of the Alaskan units of the National Park System. A compendium is a compilation of the designations, closures, openings, permit requirements and other provisions established by the park superintendent under the discretionary authority found in National Park Service regulations. The public is provided a 30-day review period to submit comments on revisions proposed by the agency or to make their own recommendations for changes.

The Commission recognizes that the National Park Service compendium process has seen many improvements since the agency first began using them in Alaska more than 20 years ago. The most significant improvement has been the addition of the 30-day public review period and the opportunity for the public to comment on proposed changes, closures or

restrictions or to suggest other actions. On occasion, public meetings are held to discuss proposed revisions, particularly those involving closures or use restrictions. improvement in the revision process is an annual meeting between the State ANILCA Implementation Program staff and the National Park Service staff, including the chief rangers for each of the park units. At this meeting, potential compendium revisions are discussed along with other management issues before public release of the documents. Commission staff has participated in those annual meetings in each of the last four years.

Despite improvements in the compendium process, significant problems persisted and worsened as the compendiums were consistently used to improperly implement "temporary" or seasonal closures of park areas to activities and uses. The agency's own regulations provide that "temporary" closures do not exceed 12-months in duration and cannot be extended, yet multiple compendium closures carried over from year to year. The National Park Service maintained that, because compendium closures are only 12-months or less in duration, they can be renewed each year and do not require a formal rulemaking.

The Commission has routinely commented that, when a closure or restriction is in apparent indefinite effect, even if it is for only a portion of the year, it constitutes a permanent closure. Permanent closures or use restrictions require initiation of a formal rulemaking process. That process requires publication of proposed regulations in the Federal Register, public notice, public meetings or hearings in the affected area(s), and opportunity for public comment. Most importantly, permanent closures or restrictions require a clear finding by the agency that the proposed action is necessary to protect park resources or values or for protection of public safety. This process was not being provided for the "roll-over" compendium provisions.

Further, the Commission has frequently commented to the National Park Service regarding insufficient public outreach and engagement with affected users, primarily regarding the number and location of public hearings. In 2013, the National Park Service started utilizing social media to gather public comments during the compendium review period. While social media may be an effective means of generating interest and reaching more members of the public outside Alaska, it is not typically effective in some rural areas of the state where residents may not have access to technology or networking capability to participate in online forums or meetings. The Commission recommended that social media compliment as opposed to replace on-the-ground public hearings in the affected vicinity.

#### Proposed Rulemaking Regarding Hunting and Trapping in Alaska

In the September 4, 2014, issue of the Federal Register, the National Park Service proposed to amend its regulations for "sport hunting and trapping in National Preserves in Alaska." Neither the State nor the Commission were provided with advance notice of this proposed rulemaking. In part, the proposed rule sought to do precisely what the Commission had been commenting on in the compendium context for years - to promulgate multiple "roll-

over" compendium provisions as permanent closures; however, the proposed rule did much more than that. A number of new permanent closures were proposed, which had not been in prior compendiums, and, most importantly, the proposed rule significantly altered the closure process that had been in effect for decades.

The proposed rule primarily focused on its preemption of state harvest authorizations; some of which had been "roll-over" compendium provisions, some of which were new, and none of which accompanied any meaningful justification other than a general aversion to perceived predator control management practices. The proposed rule did not acknowledge that the State has consistently stated it does not practice predator control on federal lands and that the authorizations at issue were responsive to local resident requests and consistent with the State's constitutional mandates.

The proposed changes to the closure process eliminated the distinction between "temporary" and "permanent" closures and established the compendium as the means of implementing closures, with some discretionary criteria for when rulemaking is required. This change essentially formalized the closure process the National Park Service had been employing for years in spite of its regulations. Process changes were significantly downplayed and unceremoniously added to a "hunting and trapping" rule, which prompted the Commission to strongly urge the National Park Service to withdraw its proposal and allow the public an opportunity to fully consider the implications of those process changes.

The proposed rule also formalized social media and the Internet as a means of public engagement while eliminating public notice and hearing requirements. The Commission has commented in prior years, and commented again, that the Internet can provide an additive tool but should not replace posted notices and public hearings in the affected vicinity.

#### Nabesna Off-Road Vehicle Regulations

As part of the implementation of its Record of Decision for the Nabesna Off-Road Vehicle Management Plan and Final Environmental Impact Statement, the National Park Service released proposed special regulations for off-road vehicle use in the Nabesna District within the Wrangell-St. Elias National Park & Preserve. The Commission had commented throughout the planning process and submitted its comments on the proposed regulations in March 2014. In those comments, the Commission continued noting its strong opposition to the closure of trails in the area to non-subsistence off-road vehicle use. The National Park Service had been inconsistent in its position on trail closures throughout the planning process, which further reduced opportunities for meaningful public engagement and input.

The Commission has never objected to the reasonable regulation of off-road vehicle use to protect park and preserve resources; however, the regulations at issue severely impacted non-federally qualified subsistence users with a long history of use, limiting their enjoyment

of those traditions and continued access to fish and wildlife resources. The proposed rule also unduly limited access by subsistence users in certain designated areas.

The final rule was published in the Federal Register in August 2014 and became effective in September 2014. No substantial changes were made to the proposed rule as a result of the limited number of comments received; only minor changes were made for clarity.

#### U.S. FISH & WILDLIFE SERVICE

#### Temporary Closure of Brown Bear Hunting Authorization

In August 2014, the U.S. Fish & Wildlife Service temporarily closed the state-authorized harvest of brown bears within the Kenai National Wildlife Refuge. The closure is in effect September 1, 2014, through May 31, 2015. The U.S. Fish & Wildlife Service chose to preempt state harvest authorizations because it perceived the allowance as having a potential negative impact on the resident bear population and further claimed an inconsistency with refuge purposes and wilderness characteristics. The Commission commented on the lack of evidence supporting the need for preemption and the resulting conflicts with cooperative federal-state management.

#### Proposed Rulemaking Regarding Access for Oil and Gas Activities

In the February 24, 2014, issue of the Federal Register, the U.S. Fish & Wildlife Service published an advance notice of proposed rulemaking and intent to prepare an environmental impact statement on non-federal oil and gas development within the National Wildlife Refuge System. The State of Alaska commented on this advance notice, requesting an exemption from this nationwide effort owing to Alaska's unique circumstances and specific guarantees with respect to inholders. The issues the proposal sought to address are already addressed in Alaska under state-specific regulations and seeking to include Alaska would likely lead to confusing cross-references and the potential for inappropriate or illegal undermining of inholder access rights. The proposed rule is scheduled to be published in 2015 and the Commission will be monitoring its advancement.

#### U.S. FOREST SERVICE

#### Sustainable Cabin Environmental Assessment

In late 2013, the U.S. Forest Service published an environmental assessment on the Tongass National Forest Sustainable Cabin Management Program which proposed the removal of nine cabins and the conversion of three cabins into shelters. The Commission urged reconsideration of these actions as cabin use has a long and important history in the

Tongass, including providing for public health and safety, and noted that closures or decreased maintenance should only occur lacking any viable alternative.

The Commission also reiterated its concerns regarding overly restrictive management of designated wilderness as a potential impetus for these actions, causing both the deterioration of the cabins which presented the issue and the preference for closure as the solution. The Commission encouraged the U.S. Forest Service to allow reasonable exceptions to the stringent restrictions it has adopted regarding the use of motorized equipment for maintenance of public cabins in designated wilderness. Providing allowances could decrease impacts to the cabin program while increasing the agency's ability to enter cooperative agreements with groups interested in helping to sustain and enhance the program.

#### **ENVIRONMENTAL PROTECTION AGENCY**

#### Proposed Rulemaking Regarding "Waters of the United States"

In the April 21, 2014, issue of the Federal Register, the Environmental Protection Agency and the Army Corps of Engineers released a highly detailed proposed rule outlining a definition of "waters of the United States" to assist each agency in administering its duties under the Clean Water Act. This proposed rule was the culmination of multiple efforts to clarify agency authorities and procedures following the plurality decision in Rapanos v. United States, 126 S. Ct. 2208 (2006). In that decision, the U.S. Supreme Court created three "tests" for U.S. jurisdiction over waters within a state. The agencies proposed to adopt and significantly expand upon the test articulated by Justice Kennedy in his lone concurrence.

The Commission commented on the proposed rule's inconsistency with federal law, including the U.S. Constitution and the Clean Water Act, as well as legal precedent, including all issued opinions in the Rapanos case. The Commission drew particular attention to the agencies' "jurisdiction per se" concept, which would automatically grant federal jurisdiction over waters satisfying highly discretionary criteria. In this way, and many other ways, the proposed rule would create federal jurisdiction, or jurisdictional confusion, over state waters with any conceivable hydrological connection to the navigable waters that formed the basis for the agencies' authority.

If adopted, the proposed rule would make every project in Alaska impacting lands or waters hostage to a jurisdictional question and create major due process concerns with respect to fines and penalties without efficient or cost-effective recourse. The Commission recommended immediate withdrawal of the proposed rule and reassessment of its approach.

#### DEPARTMENT OF THE INTERIOR

#### Taking Lands Into Trust

In July 2014, the Commission commented on the Department of the Interior's proposal to revise its land-into-trust regulations at 25 C.F.R. Part 151 to remove a provision which currently excludes (with one exception) land acquisitions in Alaska. The Commission noted its strong opposition to the removal of this provision, an ill-advised action with the potential to irreparably undermine the Alaska Native Claims Settlement Act and the significant economic, social and cultural benefits it provided to Alaska Natives. The Commission's comments further described numerous deficiencies in the proposal which inadequately conformed to requirements under the National Environmental Policy Act.

The Commission provided several alternatives to taking lands into trust which would be more effective at improving life in rural Alaska and tribal self-determination. Commission also asked that the rulemaking be suspended pending resolution of directly pertinent lawsuits in the U.S. District Court. Notwithstanding these observations, comments and requests, the Department of the Interior removed the provision in December The Commission will be ardently monitoring the impacts of this action and continuing its support of alternatives to improve opportunities for tribes in Alaska.

#### ALASKA STATE LEGISLATURE

#### **International Designations**

In February 2014, the Commission offered its support to Senate Joint Resolution No. 15, opposing the designation of lands within Alaska under various international initiatives without the full agreement and approval of the U.S. Congress, the Alaska State Legislature and the Governor of Alaska. International designations do not create any regulatory authority; however, the act of designating certain areas invariably influences management decisions by federal agencies.

The Commission provided the Senate with a particular example of where an international designation openly influenced a management decision by a federal agency in Alaska – the designation of the Izembek National Wildlife Refuge as a "Wetland of International Importance" under the Ramsar Convention. The Final Environmental Impact Statement regarding the proposed land exchange to facilitate road construction between King Cove and Cold Bay, which could result in the loss of 0.0001% of the "designated" wetland, made particular note of this loss as impacting a "solemn treaty . . . binding in international law." In disapproving the land exchange, Secretary of the Interior Sally Jewel cited the

"international significance" of the state-owned eelgrass beds in Izembek and Kinzarof Lagoons as the core of the protected area, even though those lagoons are not in the refuge.

The Commission provided other examples, as well, including advocacy efforts by national environmental groups to limit opportunities in Alaska based on perceived incompatibility with international designations. The Commission also commented on associated costs to financially strapped federal agencies that can accompany designations, such as the proposed FY '14 budget of \$661,000 to the National Park Service for its Beringian Heritage Program under an international Memorandum of Understanding, which would comprise 18% of its proposed budget for administering parks and preserves in and near the designated area.

#### Opposing Federal Aid to Certain Non-Profits

Also in February 2014, the Commission offered its support to Senate Joint Resolution No. 16, opposing federal aid to certain non-profits, noting the need for increased oversight and accountability of how and to whom federal grants are awarded. The Commission noted particular attention should be given to funded non-profits taking advocacy positions, lobbying legislative bodies and filing lawsuits against state and federal agencies.

The Commission provided the Senate with a particular example of where stricter guidelines were inarguably wanting – the U.S. Fish & Wildlife Service's 2010 "Friends" policy. The policy was intended to guide employees in engagement with "Friends" groups but lacked necessary safeguards to prevent serious conflicts of interest, improper use of appropriated funds and the potential delegation of prohibited agency actions to these groups (e.g., fundraising, advocacy, lobbying). Increased oversight and more detailed precautions in the policy could serve to prevent these and other potential abuses.

#### PUBLIC OUTREACH EFFORTS

Throughout 2014, the Commission continued fostering productive working relationships with the federal land management agencies and user groups by attending meetings, speaking at conferences and advising state agencies on historical and current issues to further informed discussions and collaborative problem solving.

In March, the Executive Director presented at the Institute of the North ANILCA Training and also presented the issues and recommendations from the 2013 Federal Overreach Summit to the House Judiciary Committee. The Executive Director and several commissioners also met with Governor Parnell and his Chief of Staff. In April, the Executive Director spoke at the Biennial Placer Mining Conference.

The newly appointed Executive Director met with Bureau of Land Management planning staff in October and National Park Service leadership, including its new Regional Director, in November to discuss issues of concern and affirm a shared dedication to working together to provide for Alaskan interests. Also in November, the Executive Director and Commissioner Lean attended a workshop led by the National Marine Fisheries Service regarding conservation and development challenges in Southcentral Alaska related to the endangered Cook Inlet beluga whale population and its critical habitat designation. The Executive Director also spoke at the 75th Annual Alaska Miners Association conference in Anchorage regarding the Commission's lengthy history and continuing availability as a resource for the Alaska mining community.

The Commission also continued its commitment to informing Alaskans on federal issues and the promise of ANILCA by initiating several outreach strategies, including the creation and distribution of several informational brochures and planning for the digitization of the Commission's vast archival history into a searchable database. Commission members also participated in a "Transfer of Public Lands" workshop in Salt Lake City, UT, where representatives from multiple states participated in a multi-day analysis of the potential capacity to transfer federal lands into state ownership and/or management.

## CONCLUSION

During 2015, the Commission will continue to expand its outreach efforts to individuals, user groups and organizations. We will also continue to provide the public with information and updates on federal land management issues and activities. Monthly distribution of the electronic newsletter will continue via e-mail and also be made available on the Commission website. The Commission is also working on developing multiple pamphlets, brochures, videos and a social media presence as educational tools and venues for the public regarding federal laws, management actions and issues.

The Commission will be strenuously engaged throughout 2015 in prioritizing and implementing a number of recommendations from its 2013 Federal Overreach Summit. Subcommittees and a proposed Advisory Group will be involved in researching and developing constructive strategies to address longstanding and evolving issues which unduly prevent Alaskans from realizing the promise of ANILCA and the Statehood Compact.

The Commission will continue to develop and expand its working relationships with federal agencies and will work diligently to keep those relationships productive. The primary focus will be on finding ways to resolve conflicts in a positive and collaborative manner. At the same time, the Commission will closely monitor changes in policy and management that could affect Alaskans' rights and guarantees under ANILCA and other federal statutes.

## Conservation System Units and Federally Designated Areas in Alaska

#### National Park Service

Park Unit	Size in Acres	Wilderness Acreage
Aniakchak National Monument & Preserve	514,000	0
Bering Land Bridge National Preserve	2,457,000	0
Cape Krusenstern National Monument	560,000	0
Denali National Park & Preserve	6,028,200	2,124,783
Gates of the Arctic National Park and Preserve	7,592,000	7,167,192
Glacier Bay National Park & Preserve	3,283,000	2,664,876
Katmai National Park & Preserve	4,268,000	3,384,358
Kenai Fjords National Park	567,000	0
Klondike Gold Rush National Historical Park	113	0
Kobuk Valley National Park	1,710,000	174,545
Lake Clark National Park & Preserve	3,363,000	2,619,550
Noatak National Preserve	6,700,000	5,765,427
Sitka National Historical Park	113	0
Wrangell-Saint Elias National Park & Preserve	12,318,000	9,078,675
Yukon-Charley Rivers National Preserve	1,713,000	0
Alagnak Wild and Scenic River	30,665	0
Aleutian World War II National Historical Area	134	0
Total	51,104,225	32,979,406

#### U.S. Fish & Wildlife Service

National Wildlife Refuge	Size in Acres	Wilderness Acreage
Alaska Maritime National Wildlife Refuge	3,417,756	2,576,320
Alaska Peninsula National Wildlife Refuge	3,563,329	0
Arctic National Wildlife Refuge	19,286,242	8,000,000
Becharof National Wildlife Refuge	1,200,060	400,000
Innoko National Wildlife Refuge	3,850,321	1,240,000
Izembek National Wildlife Refuge	311,075	307,981
Kanuti National Wildlife Refuge	1,430,160	0
Kenai National Wildlife Refuge	1,912,425	1,354,247
Kodiak National Wildlife Refuge	1,980,270	0
Koyukuk National Wildlife Refuge	3,550,080	400,000
Nowitna National Wildlife Refuge	1,560,000	0
Selawik National Wildlife Refuge	2,150,161	240,000
Tetlin National Wildlife Refuge	700,058	0
Togiak National Wildlife Refuge	4,100,857	2,272,746
Yukon Delta National Wildlife Refuge	19,162,296	1,900,000
Yukon Flats National Wildlife Refuge	8,632,224	0
Total	76,807,314	18,691,294

### **U.S. Forest Service**

National Forest	Size in Acres	Wilderness Acreage
Tongass National Forest	16,773,804	5,753,548
Chugach National Forest	5,491,580	0
Total	22,265,384	5,753,548

National Forest Wilderness and Wilderness Study Areas	Size in Acres
Kootznoowoo Wilderness (Admiralty Island National Monument)	956,255
Misty Fjords Wilderness (Misty Fjords National Monument)	2,142,442
Coronation Island Wilderness	19,232
Chuck River Wilderness	74,298
Endicott River Wilderness	98,729
Karta River Wilderness	39,889
Kuiu Wilderness	60,581
Maurille Islands Wilderness	4,937
Petersburg Creek-Duncan Salt Chuck Wilderness	46,849
Pleasant/Lemusurier/Inian Islands Wilderness	23,096
Russell Fjord Wilderness	348,701
South Baranof Wilderness	319,568
South Etolin Wilderness	82,619
South Prince of Wales Wilderness	90,968
Stikine-LeConte Wilderness	448,926
Tebenkof Wilderness	66,812
Tracy Arm-Fords Terror Wilderness	653,179
Warren Island Wilderness	11,181
West Chichagof-Yakobi Wilderness	265,286
Nellie Juan - College Fiord Wilderness Study Area	1,412,230
Total	7,165,778

Bureau of Land Management

Designated Area		Size in Acres
Steese National Conservation Area*		1,208,624
White Mountains National Recreation Area		998,702
Central Arctic Management Area – Wilderness Study Area*		478,700
	Total	2,686,026

BLM Wild and Scenic River Corridors	River Miles	Size in Acres
Beaver Creek Wild and Scenic River*	111.0	71,040
Birch Creek Wild and Scenic River*	126.0	80,640
Delta Wild and Scenic River*	62.0	39,680
Fortymile Wild and Scenic River*	392.0	250,880
Gulkana Wild and Scenic River*	181.0	115,840
Unalakleet Wild and Scenic River*	80.0	51,200
Total	952	609,280

National Trails System	Miles
Iditarod National Historic Trail*	418.0
Total	418.0

<sup>\*</sup> Component of the National Landscape Conservation System (P.L. 111-11)

#### National Wild and Scenic Rivers

Within the National Park System

River	Park Unit	River Miles
Alaganak	Katmai National Preserve	67.0
Alatna	Gates of the Arctic National Park	83.0
Aniakchak	Aniakchak Nat. Monument & Preserve	63.0
Charley	Yukon-Charley Rivers Nat. Preserve	208.0
Chilikadrotna	Lake Clark National Park & Preserve	11.0
John	Gates of the Arctic National Park	52.0
Kobuk	Gates of the Arctic Nat. Park & Preserve	110.0
Mulchatna	Lake Clark National Park & Preserve	24.0
Noatak	Gates of the Arctic Nat. Park and Noatak	330.0
	National Preserve	
North Fork of the Koyukuk	Gates of the Arctic National Park	102.0
Salmon	Kobuk Valley National Park	70.0
Tinayguk	Gates of the Arctic National Park	44.0
Tlikakila	Lake Clark National Park & Preserve	51.0
	Total	1215.0

Within the National Wildlife Refuge System

River	Refuge Unit	River Miles
Andreafsky	Yukon Delta National Wildlife Refuge	262.0
Ivishak	Arctic National Wildlife Refuge	80.0
Nowitna	Nowitna National Wildlife Refuge	225.0
Selawik	Selawik National Wildlife Refuge	160.0
Sheenjek	Arctic National Wildlife Refuge	160.0
Wind	Arctic National Wildlife Refuge	140.0
	Total	1027.0

Citizens' Advisory Commission on Federal Areas Representative Wes Keller, Chairman Sara Taylor, Executive Director