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DIVISION OF GOVERNMENTAL COORDINATION

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*Sent 5-31-88
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May 27, 1988

Mr. Boyd Evison
Regional Director
National Park Service
2525 Gambell Street
Anchorage, Alaska 99503-2892

Dear Mr. Evison:

The State of Alaska has reviewed the National Park Service (NPS) draft Environmental Impact Statements (EISs)/Wilderness Recommendations for the Bering Land Bridge National Preserve (NPr), Kenai Fjords National Park (NP), and Yukon-Charley Rivers NPr. The following letter is submitted on behalf of state agencies and represents a consolidation of state concerns and comments. The state's comments are presented in four sections as follows: Introductory Comments; Comments on the Specific Wilderness Recommendations; General Comments which Apply to All Three EISs; and Page-specific Comments.

INTRODUCTORY COMMENTS

The State of Alaska recognizes that Wilderness has a legitimate place in the range of land use classifications which exist in Alaska. However, the state believes some of the NPS Wilderness recommendations are inappropriate. The state has used the following criteria to review the Wilderness recommendations and suggest modifications. Given the NPS's familiarity with these areas, we also urge the NPS to carefully review its draft recommendations to determine whether any lands included in its proposed actions fall within the categories described below. If NPS finds that certain recommended lands do fall in within one or more of these categories, the state requests that NPS either 1) explicitly identify them in the final EISs and provide the compelling reasons for recommending them or 2) delete them from the proposed action.

CRITERIA:

1. Areas where Wilderness designation would eliminate, reduce or restrict existing uses, structures or activities that are allowed by ANILCA and are not degrading resource values;
2. Areas where there is a current or foreseeable need for:

- a) NPS visitor facilities or recreational development (e.g., visitor centers, campgrounds, trails, lodges, public use cabins);
 - b) developed access (e.g., roads, airstrips, docks, helicopter landing sites);
 - c) state or federal administrative/management facilities (e.g., ranger stations, air/water quality monitoring stations, research facilities);
 - d) utility corridors or facilities (e.g., pipelines, power transmission lines, remote communications equipment);
3. Areas with valid and/or patented mining claims;
 4. Areas that have reasonable potential for inclusion in land exchanges or where park boundaries are in dispute;
 5. Areas where cabins or other structures are used for commercial (e.g., guiding or commercial fishing) or residential purposes;
 6. Areas where mechanized equipment (e.g., chainsaws, generators) has traditionally been used to support commercial, recreational, subsistence, or management (e.g., habitat improvement) activities;
 7. Areas immediately adjacent to roads, mining activity, recreational facilities, or other existing or proposed development;
 8. Areas where off-road vehicles have been traditionally used for recreational purposes; and,
 9. Areas immediately adjacent to navigable waterbodies and other state lands within park boundaries.

In addition, the state requests that the NPS explicitly evaluate its recommendations for conformance with Department of Interior (DOI) guidance regarding lands which merit consideration for Wilderness designation. The state understands that the following criteria were provided by DOI in September 1986 to the guide NPS recommendations:

1. Areas with unique resources or characteristics that may have been overlooked by Congress when it established the Wilderness designations in the Alaska National Interest Lands Conservation Act (ANILCA);

2. Areas that, as a result of user trends, land use patterns, and other influences, may have evolved as integral to the Wilderness experience;
3. Adjustments to the boundaries of already designated Wilderness to make boundaries conform more closely to natural features or to facilitate resource management and protection; and,
4. Areas that possess such unique and special qualities that make it appropriate to preclude future NPS management options.

The state is particularly concerned that the Wilderness recommendations meet DOI's first criteria. The exceptional resource values of these park units have already been acknowledged by the creation of the parks. Adding an additional layer of protection to this must be clearly justified. The state requests that NPS explicitly identify the resources and values in each of the areas proposed for Wilderness designation that warrant this added layer of protection.

COMMENTS ON BERING LAND BRIDGE NPr, KENAI FJORDS NP, AND
YUKON-CHARLEY RIVERS NPr WILDERNESS RECOMMENDATIONS

Based on the considerations described above, the state has identified the following areas that should not be recommended for Wilderness designation. The state notes that additional areas may be identified for deletion following review of the final EISs.

Bering Land Bridge National Preserve:

Exclude Imuruk Lake and lands within one half mile of the lake from the Wilderness recommendation.

Rationale:

- 1) Options for future development in this area would be restricted if designated Wilderness. Possible developments include visitor facilities, docks, campgrounds, trails, research structures, and cabins. The EISs, in fact, list several "reasonably foreseeable" developments which would be precluded by Wilderness designation, including a dock at Imuruk Lake, a permanent air/water quality monitoring station, a permanent research structure, a 5-site campground, 30 miles of trail, an interpretive sign, and a permanent reindeer herders cabin. While it may be premature to decide to develop these facilities, the state believes that these options should not be precluded.

- 2) The state asserts that Imuruk Lake is navigable and therefore holds title to the submerged lands. Wilderness designation of uplands surrounding the lake could increase the potential for conflicts between the NPS and state regarding state management of the lake.

Yukon-Charley Rivers National Preserve:

Exclude the Charley River corridor (one half mile on either side of the river) from the Wilderness recommendation.

Rationale:

- 1) The state asserts that the Charley River is navigable. Designation of the corridor as Wilderness could increase the potential for conflicts between the NPS and state regarding state management of the river.
- 2) The Charley River is a National Wild and Scenic River. This designation provides adequate protection of federal interests in the river corridor.

Exclude from the Wilderness recommendation the proposed Circle Hot Springs to Eagle road corridor and one half mile on either side of the proposed alignment.

Rationale:

Development of a road from Circle Hot Springs to Eagle has been discussed for years. The Alaska Department of Transportation and Public Facilities recently completed a reconnaissance study on the route. If this area were designated as Wilderness, it would be more difficult to receive approval for any future road development. (Congress must approve Title XI applications for projects within Wilderness areas.)

The state notes that it will be continuing to review the Yukon-Charley Rivers recommendation based on information currently being requested from the NPS. Following this review, the state may have additional comments on this proposal.

Kenai Fjords National Park:

Exclude the Nuka River drainage from the Wilderness recommendation.

Rationale:

The Alaska Power Authority (APA) and the NPS signed an agreement on June 16, 1986, regarding the diversion of Nuka River headwaters to provide water for the Bradley Lake hydroelectric

project. There is a re-opener clause in the agreement which would allow NPS to modify the agreement after ten years if it is determined to be in conflict with park purposes. The APA is concerned that, if this area were designated as Wilderness, it could be argued that the purpose of the park is to preserve Wilderness and therefore natural flows should be restored. Although the state would disagree with this position, we believe it is prudent to avoid this potential conflict by deleting the Nuka River drainage from the Wilderness recommendation.

Exclude Aialik Bay, McCarty Fjord, and West Arm from the Wilderness recommendation.

Rationale:

- 1) The state believes NPS should retain the option of developing visitor facilities along some portions of the Kenai Fjords coastline. Wilderness designation would preclude development of most visitor facilities.

The state recognizes that excluding Aialik Bay, McCarty Fjord, and West Arm from the Wilderness recommendation may not be the only way to retain NPS management options for visitor developments. These exclusions are proposed as one example of an appropriate mix of Wilderness and non-Wilderness lands.

- 2) The state owns all tide and submerged lands adjacent to the park and is responsible for issuing tideland leases and permits for docks, mariculture facilities, temporary camps, and other activities. Designation of coastal uplands as Wilderness may increase the potential for conflicts between the NPS and state regarding state management of tide and submerged lands. Reducing the amount of coastline recommended for Wilderness may minimize this potential for conflict.
- 3) There are eight unpatented gold mining claims near West Arm and McCarty Fjord within the area recommended for Wilderness. Wilderness designation in this area may make it more difficult to mine these claims.

GENERAL COMMENTS WHICH APPLY TO ALL THREE EISS

- 1) The EISS do not adequately justify NPS Wilderness recommendations, i.e., why certain lands are recommended for Wilderness designation and others are not. It is not clear how NPS determined which suitable parklands should be recommended for designation. The state recommends that the NPS add a new section to the final EISS which describes the

criteria NPS used to develop proposed actions and identifies the specific resources and values it is seeking to protect.

Because Wilderness forecloses many future management options, limits opportunities for development, and restricts public use of parklands, the state cannot support the designation of additional Wilderness, unless a compelling reason exists for such designation. The state urges the NPS to include additional rationale for its Wilderness recommendations in the final EISs.

- 2) The EISs do not adequately describe the differences between management of wilderness and non-wilderness parklands. Because these differences are not clearly delineated, the public cannot fully assess the impacts of Wilderness designation. As we have suggested in the past, the state recommends that the NPS include in each EIS a table which lists activities, structures, and uses which are affected by Wilderness designation. The table included in the Alaska Land Use Council's Draft Wilderness Review Guide could be used as a basis for this list. The state suggests that the following items, among others, be included in the list: 1) visitor centers, public use cabins, and campgrounds; 2) roads, airstrips, utility corridors, and docks; 3) guide cabins and camps; 4) use of chainsaws and generators; 5) use of off-road vehicles and helicopters; and 6) use of inholdings and adjacent lands; 7) commercial fishing; and use of temporary facilities.

The state notes that there are many activities, uses and structures which will likely be managed more restrictively in Wilderness than in non-Wilderness parklands, even though there are no laws or regulations which specifically mandate increased restrictiveness for these uses. The state therefore requests that NPS describe as clearly as possible how Wilderness designation will affect NPS management philosophy and policies. The state is particularly interested in how Wilderness designation will affect NPS discretionary decisions, e.g., issuance of special use permits and the conditions attached to these permits.

As an example, the NPS considers development of a 30-room lodge on the Harding Icefield in the Kenai Fjords NP to be a "reasonably foreseeable action" if no adjacent lands are designated as Wilderness. If adjacent lands are designated as Wilderness, the NPS indicates that a 20-room lodge is a "reasonably foreseeable action." The state is not aware of any laws or regulations which specifically address lodge size; however, NPS appears to have a management preference for smaller developments on lands adjacent to Wilderness areas. The state believes it would be useful for the public

to better understand the affect of Wilderness designation on descretionary NPS administrative decisions.

- 3) The EISs do not adequately stress that the development and use scenarios presented for each alternate are speculative. Since these scenarios provide the basis for assessing the impacts of Wilderness designation and may affect public opinion regarding the merits of designating Wilderness, the EISs should repeatedly stress that the scenarios represent a best guess at future needs and developments. Actual developments and associated impacts may be much greater or lesser than described. The state suggests that the NPS remind readers at the conclusion of each impact analysis that the scenarios and impacts analysis are speculative.
- 4) The EISs do not adequately describe the relationship between the management directions established in General Management Plans (GMPs) for these units and the Wilderness recommendations. The state requests that the final EISs discuss this relationship. In particular, the GMPs indicate that NPS intends to maintain options for future visitor-related development. The EISs should clearly discuss how this objective is affected by the Wilderness recommendations. The state requests that where Wilderness will preclude opportunities for future visitor developments, the EISs identify alternative, develop sites; provide clear rationale for proceeding with the recommendation; or exclude the area from the Wilderness recommendations.

PAGE-SPECIFIC COMMENTS

Yukon-Charley Rivers NPr:

Page 53, paragraph 2 - This paragraph indicates that the state rescinded its application for a right-of-way from Circle Hot Springs to Birch Creek (west of the preserve) and that the Circle Hot Springs to Eagle route is not identified for further study in the "Interior Transportation Study." The implication is that the route will not be built, which is misleading.

The state's application for a right-of-way from Circle Hot Springs to Birch Creek was rejected by the Bureau of Land Management. The rejection was based on the failure of the state to meet all of the requirements of Title V of the Federal Land Policy and Management Act of 1976 and of Title XI of ANILCA. Rejection of the application does not indicate that the state no longer wants the right-of-way. Also, this paragraph should reference the existing trail running from Circle Hot Springs to Birch Creek and east into the Preserve, and also note the possibility of a Revised Statute 2477 right-of-way on that trail.

As clearly indicated in our earlier comments, the state requests that this proposed route be deleted from the Wilderness recommendation.

Page 61, paragraph 2 - Given the lack of definitive recreation use trends, as discussed on pages 47-48, the impact of projected boat and airplane use may be overestimated.

Page 78 - We do not agree with the statement in the ANILCA Section 810 evaluation that "The NPS has found that all-terrain/off-road vehicles are generally not traditional means of access for subsistence pursuits." We are unaware of any joint research or studies conducted to determine whether traditional uses of ATVs occurred in this area before the passage of ANILCA. Therefore, we continue to object to this NPS position. This objection applies to the findings in all three EISSs.

Page 15 - The document states that the existing airstrips "would remain in periodic use but undeveloped and unmaintained." We suggest that this statement be clarified, consistent with the General Management Plan, to mean that these airstrips will not be maintained by NPS, and that these strips may be maintained by entities other than NPS with NPS authorization.

Pages 19 and 71 - The NPS states that helicopters are not permitted in the preserve now, and will not be under the preferred alternative. This contradicts the General Management Plan, which allows helicopter use to continue under permit for recreational access to the Upper Charley River. Our understanding is that this policy evolved because the airstrip which ANILCA mandated be developed (as described on page 46) will not be allowed under NPS policy. We request that this contradiction be corrected.

Page 42, Subsistence use - The first paragraph indicates that about twenty families regularly use the preserve for subsistence purposes. The state requests clarification regarding whether the harvest estimates for the preserve, presented in Table 4, are associated with these twenty families or with the area residents. Furthermore, we suggest that the table be clearly labeled an "Estimate," and accompanied by an explanation that it is subject to revision when further information becomes available.

Page 43, Subsistence Moose Hunting Areas map - The Alaska Department of Fish and Game Regional Habitat Guide is cited as a source of information for this map. However, the Guide contains no maps depicting subsistence moose hunting areas in the preserve and these communities are not discussed in the subsistence narrative. Consequently, it is unclear how the Guide was used in developing this map. The map's accuracy would be increased if the time period depicted was included in the legend. (The

disclaimer in the text at the top of page 44 is helpful in this regard.)

Page 52, paragraph 2 - In the second line, and elsewhere in the draft plan, (e.g., page 75, final paragraph and pages 78-79) "local, rural residents" should replace "subsisters."

Page 56, paragraph 7 - The document projects that use of the preserve by sport hunters each year is expected to reach 4,500 by the year 2020. We are uncertain how this figure was determined, or how it compares to current uses of the preserve by sport hunters. Should sport hunting use rise to this level, however, there would be negative impacts on local, rural residents who use the refuge for subsistence purposes. If NPS continues to believe that these increases are realistic, the state would disagree with the finding of no impact made for this alternative on page 59.

Page 62 - The anticipated impacts based on increased aircraft use for sport hunting contradict the ANILCA 810 evaluation (page 79) where NPS anticipates no increase in number of hunters. We request that this apparent contradiction be rectified.

Page 79, ANILCA 810 evaluation - Competition for resource users. We disagree that a 2900 percent increase in visitor use (page 62, final paragraph) particularly including 4,500 sport hunters per year by 2020 (page 56, next to last paragraph), will not significantly increase competition with local, rural residents. We recognize that increased use of the preserve may occur independent of Wilderness designations. However, the potential for conflicts with subsistence users should be acknowledged if visitor use rises to the levels projected in this document.

Kenai Fjords NP:

Page 18 - The state request clarification regarding how administrative use of helicopters (e.g., for marine mammal and game surveys) will be managed in Wilderness areas. The EIS states that "helicopter landings would be permissible only outside Wilderness, and then only on a site or sites designated by special regulations."

Bering Land Bridge NPr:

Page 5, paragraph 1 - The state disagrees with the statement that "under this alternative, there would also likely be an increase in the taking of moose for subsistence and sport hunting purposes because of the development and use of all-season transportation corridors." It is the State's experience in similar developments elsewhere in Alaska that new access may initially result in increased harvest. However, because access is easier the moose

populations are more vulnerable to over harvest. The two major long term consequences that we recommend be noted in the EIS are reduced subsistence and sport harvest of moose in order to maintain desired population levels, and a loss of habitat productivity from the road and the attendant increase in human activities.

Page 7 - The state objects to the proposed NPS requirement that subsistence users obtain a permit for use of chainsaws in designated Wilderness and non-wilderness areas. The state believes this requirement imposes an unnecessary regulatory burden on local rural residents. The cutting of wood for fires, temporary shelters, and trapping materials has gone on for decades without significant impact on Wilderness values. In addition, the state notes that the U.S. Fish and Wildlife Service, a sister agency of the NPS, allows subsistence use of chainsaws without a permit in Wilderness and non-wilderness areas. This comment applies to NPS management of all wilderness areas.

The state also disagrees with NPS's determination that use of motors (e.g., generators) is prohibited in Wilderness areas in Alaska. As stated in each EIS, ANILCA modifies implementation of the Wilderness Act in Alaska. Numerous sections of ANILCA (e.g., Section 1315) permit uses in Alaska Wilderness that are not permitted in Wilderness areas in the lower 48 states. The state believes that Section 1316 of ANILCA, which provides for the use of "temporary facilities and equipment" authorizes use of motorized equipment in Alaska Wilderness areas if directly and necessarily related to the taking of fish and wildlife. The state supports a policy of allowing limited use of motorized equipment in support of traditional activities (e.g., guiding and subsistence) where it would not significantly detract from Wilderness values.

Page 10 - A map showing the locations of the communities and places addressed in the text should be included in this document and the other two EISs. Many place names are difficult, if not impossible, to locate on the topographic map used as a base for the document's graphics. In addition to the communities, important locations to show include Macklin Creek, Serpentine Hot Springs, Imuruk Lake, Lava Lake, Kuzitrin Lake, Cape Espenberg, Devil Mountain, Killeak Lake and the Nome-Taylor Highway.

Page 37 - The proposed action takes a realistic approach to the possibility that some existing routes through the preserve serve a transportation need and may be improved in the future. While it is impossible at this point to know when such improvement will be needed, their historic use and their future potential provide a logical basis for addressing them in the Wilderness

recommendation process. We hope subsequent Wilderness recommendations will take a similar approach to future transportation system improvements.

Page 54, paragraph 2 - The state requests that the first sentence be revised to read "those providing skins for sale or domestic use..."

Pages 60-62, 85-87, and 104-105 - The state requests that the methods used for estimating resources harvested overall and for subsistence purposes be presented. In addition, the headings for Tables 9 and 10 should indicate the estimated harvest levels in pounds for the selected communities. Otherwise, their content could be misinterpreted as characterizing the overall extent of preserve use for subsistence purposes. Also the map on page 62 would be more accurate if it specified the time period portrayed. Since subsistence patterns are dynamic and subject to change over time, this map should not be interpreted as depicting the only areas of the preserve that are, have been, or may be, used for moose hunting by local, rural communities. A more useful map would depict areas in and adjacent to the preserve used by local communities for a wider range of subsistence activities.

Page 66 - We request clarification of the statement that the NPS does not currently "license" any hunting guides within the preserve. Our understanding is that NPS issues permits to licensed hunting guides in accordance with the areas assigned by the Guide Board. The state requests clarification of this issue in the EIS.

Page 87 and 125 - The moose season opening date presented in the first full paragraph should be changed to August 1.

Page 77, 96 & 116, Routes and Access Roads - The Environmental Consequences Section, Alternatives 1-3, states that "barrow (borrow) pits are not permitted within the preserve boundary, gravel ... would come from outside the preserve." We suggest that, because of the haul distances involved and the possible scarcity of adequate material, it may not always be prudent and feasible to obtain borrow material from outside of the preserve. When construction occurs, it may be necessary to look for sources within the preserve and to take practical measures to mitigate possible impacts on preserve values and resources. We believe that Section 1102(4)(b) of ANILCA provides for such sites.

Pages 151-156, ANILCA 810 evaluation - We again recommend replacing the term "subsisters" with "local rural residents." This change should be made elsewhere in this plan as necessary.

May 27, 1988

On behalf of the State of Alaska, thank you for the opportunity to review these draft EISSs. If we can be of assistance in clarifying the state's comments, please do not hesitate to call this office.

Sincerely,

Robert L. Grogan
Director

A handwritten signature in cursive script that reads "Michelle Sydeman". The signature is written in black ink and extends across the width of the page.

By Michelle Sydeman
CSU Coordinator

cc: Commissioner Judy Brady, DNR
Commissioner Don Collinsworth, DFG
Commissioner Dennis Kelso, DEC
Commissioner Mark Hickey, DOT/PF
Commissioner Tony Smith, DCED
Mr. Rod Swope, Office of the Governor
Mr. John Katz, Office of the Governor
Alaska Land Use Council Members
Land Use Advisors Committee Members

TITLE: NPS Wilderness Recommendations

- [1272] Mr. Mike Abbott, Resource Development Council, Anchorage
- [1304] Ms. Susan Alexander, The Wilderness Society, Anchorage
- [1266] Ms. Gail Baker, U.S. Fish & Wildlife Service, Anchorage
- [1252] Mr. Michael Barton, U.S. Forest Service, Juneau
- [1037] Ms. Joyce Beelman, Alaska Department of Environmental Conservation, Fairbanks
- [1400] Ms. Mary Bixby, Division of Governmental Coordination, Juneau
- [1490] Mr. Rex Blazer, Northern Alaska Environmental Center, Fairbanks
- [120] The Honorable Judy Brady, Department of Natural Resources, Juneau
- [1372] Mr. Al Carson, Department of Fish and Game, Anchorage
- [248] The Honorable Don Collinsworth, Department of Fish and Game, Juneau
- [1491] Mr. Steve Colt, Institute of Social and Economic Research University of Alaska, Anch, Anchorage
- [942] Ms. Tina Cunning, Department of Fish and Game, Nome
- [1373] Mr. Donald D'Onofrio, National Ocean Service, Anchorage
- [1492] Ms. Judith W. Eckholm, Juneau
- [1286] Mr. Boyd Evison, National Park Service, Anchorage
- [499] Mr. Roy S. Ewan, Ahtna, Inc., Copper Center
- [1493] Mr. Don Finney, Alaska Loggers Association, Inc., Ketchikan
- [975] Mr. Darryl L. Fish, Bureau of Land Management, Anchorage
- [203] Mr. Peter Freer, Department of Community and Regional Affairs, Juneau
- [1274] Mr. Thomas Gallagher, University of Alaska, Fairbanks, Fairbanks
- [1407] Mr. Harold Gillam, Land Use Advisors Committee, Fairbanks
- [1325] Mr. Charlie Green, Department of Commerce and Economic Development, Fairbanks
- [303] Mr. Robert L. Grogan, Division of Governmental Coordination, Juneau
- [1419] Mr. Terry Haynes, Department of Fish and Game Subsistence Division, Fairbanks
- [1268] The Honorable Mark Hickey, Dept. of Transportation & Public Facilities, Juneau
- [1494] Mr. William J. Holman, National Parks and Conservation Assoc, Ketchikan
- [1406] Reverend J. Michael Hornick, Land Use Advisors Committee, Anchorage
- [1413] Mr. Clark Horton, Federal Aviation Administration AAL-4, Anchorage
- [1271] Ms. Sharon Jean, Land Use Advisors Committee, Soldotna
- [1244] Col. Jack Jordan, Department of Public Safety, Anchorage
- [1288] The Honorable Dennis Kelso, Department of Environmental Conservation, Juneau
- [1297] Mr. Arthur Kennedy, Anchorage
- [1298] Dr. John Choon Kim, Land Use Advisors Committee, Anchorage
- [1270] Mr. Larry Kimball, Alaska Federation of Natives, Anchorage
- [1377] Mr. Mark Kuwada, Department of Fish & Game, Anchorage
- [1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
- [937] Ms. Janie Leask, Alaska Federation of Natives, Anchorage
- [1243] Mr. Robert LeResche, Alaska Power Authority, Anchorage
- [1258] Mr. Craig Lindh, Division of Governmental Coordination, Juneau
- [1] Mr. Mark Mayo, Department of Transportation and Public Facilities, Anchorage
- [945] Ms. Janet McCabe, National Park Service, Anchorage
- [946] Mr. Ron McCoy, Alaska Land Use Council, Anchorage

TITLE: NPS Wilderness Recommendations

- [847] Mr. Curtis McVee, Alaska Miners Association, Inc., Anchorage
- [1269] Mr. Mike Mitchell, Alaska State Library, Juneau
- [947] Mr. Ron Morris, U.S. Department of Interior, Anchorage
- [1508] Rear Admiral Edward Nelson, Jr., U.S. Coast Guard District 17, Juneau
- [1420] Ms. Kris O'Connor, Department of Natural Resources Division of Oil and Gas, Anchorage
- [1408] Mr. Richard Ogar, ARCO Alaska, Inc., Anchorage
- [1290] Ms. Debra Oylear, Division of Governmental Coordination, Anchorage
- [1287] Mr. Michael J. Penfold, Bureau of Land Management, Anchorage
- [1277] Mr. Norman Piispanen, Dept. of Transportation & Public Facilities, Fairbanks
- [469] Mr. Jim Powell, Department of Natural Resources, Juneau
- [1409] Mr. John Rense, NANA Development Corporation, Anchorage
- [1273] Mr. Randy Rogers, Northern Alaska Environmental Center, Fairbanks
- [1299] Mr. Wayne Ross, Land Use Advisors Committee, Anchorage
- [501] The Honorable Jim Sampson, Commissioner Department of Labor, Juneau
- [87] Dr. Lidia Selkregg, Land Use Advisors Committee, Anchorage
- [1495] Mr. Robert Senner, Anchorage
- [1378] Mr. Thyes Shaub, Department of Commerce and Economic Development, Juneau
- [948] Mr. Walt Sheridan, U. S. Forest Service, Juneau
- [1275] Mr. Ron Silas, Tanana Chiefs Conference, Fairbanks
- [1285] Mr. Walter Stieglitz, U.S. Fish & Wildlife Service, Anchorage
- [1496] Mr. Reed Stoops, Juneau
- [1421] Ms. Lisa Sutherland, Senator Steven's Office, Washington
- [22] Mr. Rod Swope, Office of the Governor, Juneau
- [1242] Mr. Ike Waits, Department of Community & Regional Affairs, Anchorage
- [1239] Mr. Rob Walkinshaw, Department of Natural Resources, Anchorage
- [940] Mr. Vernon R. Wiggins, Alaska Land Use Council, Anchorage
- [1240] Mr. Dan Wilkerson, Department of Environmental Conservation, Anchorage
- [994] Mr. Geoff Wistler, Department of Commerce and Economic Development, Juneau