

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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August 29, 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 Statement (EIS)/Wilderness Recommendation for Denali National Park. 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: Introduction; Wilderness Recommendations; General EIS Comments; and Page-specific Comments.

### INTRODUCTION

The State of Alaska recognizes that Wilderness has a legitimate place in the range of public land use classifications which exist in Alaska. However, the state believes that a portion of the NPS Wilderness recommendation contained in this EIS is 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 EIS and provide compelling reasons for recommending them or 2) delete them from the proposed action(s).

### Criteria

1. Areas where Wilderness designation would eliminate, reduce or restrict existing uses, structures or activities that are allowed by the Alaska National Interest Lands Conservation Act (ANILCA) and are not degrading resource values;
2. Areas where there is a current or foreseeable interest in or 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 activities;
  7. Areas immediately adjacent to roads, mining activity, recreational facilities, land with oil and gas potential or existing leases, or other existing or proposed development;
  8. Areas where off-road vehicles have been traditionally used; and,
  9. Areas immediately adjacent to state lands, navigable waterbodies, submerged lands, tidelands, and possible Revised Statute (RS) 2477 rights-of-way.

In addition, the state requests that the NPS explicitly evaluate its recommendations for conformance with the following September 1986 Department of the Interior (DOI) guidance regarding lands which merit consideration for Wilderness designation:

1. Areas with unique resources or characteristics that may have been overlooked by Congress when it established the Wilderness designations in 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.

#### DENALI NATIONAL PARK AND PRESERVE WILDERNESS EIS:

##### Recommendation:

The State of Alaska opposes designation of the northern park addition as wilderness.

##### Rationale:

- 1) Designation of this area as Wilderness would make development of a northern access route from the Parks Highway to Kantishna more difficult. Such a route would alleviate pressure on the existing park road, provide additional opportunities for visitors to enjoy the park, and facilitate mineral development in the Kantishna area.
- 2) There are numerous possible RS 2477 rights-of-way within the northern park addition. (See the map provided on page 189 of the Denali General Management Plan.) Although Wilderness designation would not affect validity determinations for these rights-of-way, Wilderness management could conflict with future uses and/or development of these routes.
- 3) The state asserts that portions of the Tokositna, Muddy, and Kantishna rivers are navigable. Designation of lands adjacent to these rivers as wilderness could increase the potential for state/federal management conflicts.

##### Recommendation:

The State of Alaska opposes Wilderness designation of the southern park addition from the east side of the Eldridge Glacier to the eastern boundary of the park, near Cantwell.

**Rationale:**

- 1) This area encompasses the Cantwell/Dunkle Mine area and contains more than 100 unpatented mining claims. Designation of this area as Wilderness would likely make development of these claims more difficult.
- 2) This area also contains state and regional and village corporation lands and selections. Future use and development of these lands may not be consistent with Wilderness management. The state urges NPS to avoid potential Wilderness conflicts by deleting this area from the Wilderness proposal.
- 3) Both this area and the northern park addition are used regularly by local rural residents engaged in traditional activities. The state is concerned that, over time, Wilderness designation may lead to restrictions or access methods and activities currently allowed within Wilderness. The state therefore does not support Wilderness designation in these areas.

**GENERAL EIS COMMENTS**

- 1) The document does 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 EIS which describes the criteria NPS used to develop Wilderness recommendations and identifies the specific resources and values it is seeking to protect.

This is particularly important in the case of proposed actions. We note that the U.S. Fish and Wildlife Service, a sister agency in the Department of Interior, includes in its Comprehensive Conservation Plans a chapter titled "Evaluation of Alternatives" which presents evaluation criteria, compares alternatives, assesses the relative costs of each alternative, and explains why the preferred alternative was chosen. (See draft Arctic National Wildlife Refuge CCP/EIS, pages 384-399.) We request that the final EIS contain such an evaluation.

Because Wilderness limits management options, opportunities for development, and certain public uses 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 EIS.

- 2) The document does 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 urged in the past (see November 24, 1986, correspondence), the state recommends that the NPS include in each document 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 (1987) 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; 6) use of inholdings and adjacent lands; 7) commercial fishing; and 8) use of temporary facilities.

The state notes that there are many activities, uses and structures which NPS may manage 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 more clearly describe 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 effect of Wilderness designation on discretionary NPS administrative decisions.

- 3) Each of the EISs (page 7) notes that the validity of RS 2477 rights-of-way and the navigability of rivers (as it relates to state ownership) will be determined on a case by case basis, and that navigable rivers and valid RS 2477 rights-of-way would not be designated as Wilderness. This

statement should be expanded to explain how navigability determinations and RS 2477 validity determinations will be addressed **after** Congress has acted on these Wilderness recommendations. Specifically, the state requests that the intent of this paragraph be clarified with the following insert at the end of the last sentence: "even if the navigability or validity determination is made after the surrounding area has been designated as Wilderness." Further, we request that this intent be included in any Wilderness legislation forwarded to Congress by the NPS.

- 4) The EIS does not adequately stress that the development and use scenarios presented for each alternative 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 EIS should repeatedly stress that the scenarios represent the NPS's best guess at future needs and developments. Actual developments and associated impacts may be much greater or less than described. The state suggests that the NPS remind readers at the conclusion of each impact analysis that the scenarios and impacts analyses are hypothetical. The state further suggests that the EIS clarify that some of the developments contained in the scenarios are not consistent with the adopted General Management Plan (GMP) and would, therefore, not currently receive approval from the NPS.
- 5) The EIS does not adequately describe the relationship between the management directions established in the GMP for this unit and the Wilderness recommendations. The state requests that the final EIS discuss this relationship. In particular, the GMPs generally indicate that NPS intends to maintain options for future visitor-related development. The EIS 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 EIS identify alternative development sites; provide clear rationale for proceeding with the recommendation; or exclude the area(s) from the Wilderness recommendation.
- 6) The EIS (page 7) states that "helicopter landings are not permitted in Wilderness except when necessary for administrative purposes such as search and rescue activities, NPS research for management purposes, fire management". The state requests that the EIS clearly indicate that state agencies with management and research responsibilities within park units (e.g., the Alaska Departments of Fish and Game, Public Safety, Natural Resources, and Environmental Conservation) may also land helicopters in designated

Wilderness when necessary.

- 7) The maps included in the EIS are not adequate for finding landmarks addressed in the respective texts. The state requests that at least one map be included in each EIS showing pertinent features that are referenced in the text. Further, we strongly urge that the final documents be accompanied by more detailed inset maps showing the proposed new boundaries in greater detail.
- 8) Each EIS presents tables depicting estimated subsistence resource harvest levels. (See pages [ #8 insert] The headings for these tables are inadequate for explaining their content and could be problematic if the tables are taken out of context. The EIS indicate that the subsistence harvest levels depicted in these tables are "very rough estimates extrapolated from a variety of sources listed in the bibliography." We recommend further discussions of how these figures were developed and their margin of error. The Alaska Department of Fish and Game, Division of Subsistence technical reports are among the sources cited, but it appears that considerable guess work was also used. While we appreciate the effort to estimate subsistence harvest levels in the park units, we believe a more detailed explanation is necessary to assure proper use of this information in the future. If additional explanatory material cannot be added to the text, we recommend deletion of these figures to avoid basing decisions on potentially invalid or poor information. This is especially important since this information may be used for decision-making in other contexts.
- 9) The term "subsisters" should be deleted wherever it occurs in the EIS and replaced with "local rural residents" or similar language. Similarly, references to "commercial hunting" should also be replaced with "guided hunting" or "hunting guide camps". There is no "commercial hunting" in Alaska because wildlife cannot be sold.
- 10) 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 heating, temporary shelters, and materials for trapping has gone on for decades. 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.

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.

- 11) The state is uncomfortable with Wilderness recommendations immediately adjacent to state lands. To date, there has been little indication that an NPS Wilderness designation could be used to restrict development activities on adjacent state lands. However, in the long-term, there are no assurances that legal and/or political pressures will not change this situation. For this reason, the state requests that all the EIS, and any subsequent proposed legislation, contain a statement of intent that the designation of Wilderness will not affect the use and development of adjacent non-federal land.
- 12) The ANILCA Section 810 evaluation contained in the EIS is lacking in the specificity needed to facilitate an assessment of the potential effects of the proposed action on subsistence uses. (See page-specific comments.) Our major concerns regarding the 810 evaluation are 1) contrary to what is suggested in the plans, subsistence use "patterns" are not depicted; only harvest estimates are provided and their accuracy is questionable; 2) because subsistence use patterns of the unit and adjoining areas by resident zone communities are not described, the EIS fail to sufficiently evaluate the potential effects on subsistence uses of either the proposed action or other alternatives.

The state recommends that the final EIS include a more thorough discussion of how the proposed Wilderness areas are and have been used for subsistence purposes by local rural residents and communities. This discussion should include, but not necessarily be limited to, months of harvest activities; resources harvested; modes of access for specific activities; and additional material on how harvest data were developed.

- 13) Without adequate justification, this and other NPS EISs consistently predict degradation of wilderness values if



parklands are not designated as Wilderness. The Environmental Consequences section of each EIS includes the following conclusion for the No-action Alternative:

Over the long term this alternative would result in deterioration of Wilderness character, reduction of Wilderness size, and destruction of some Wilderness values that would be irreplaceable. A large part of the study area would become semi-wilderness, and some non-wilderness in character.

This conclusion is not supported by the development scenarios contained in the EISs. In many cases, the differences between the scenarios are negligible (e.g., development of a seasonal ranger station, an interpretative sign, or a primitive campground). The state requests that NPS revise its conclusions to be consistent with the anticipated effects of each development scenario. Conclusions which are not supported by the scenarios are purely speculative and should be deleted from these EISs. The state further requests that NPS substantiate statements made throughout each EIS regarding the added resource protection Wilderness provides.

- 14) Several of the EISs imply that Wilderness designation would reduce airplane overflights and landings and recreational visits. (See Noatak EIS, page 17, column 1.) The state objects to this characterization. The Wilderness Act, as amended by ANILCA in Alaska, does not place restrictions on the use of aircraft or the number of people who can visit a particular park. We request that this inference be deleted from the documents.

In addition, each EIS contains the following statement which we believe needs clarification: "Policy over the long term will vary on decisions about such things as road locations and mileage, landing sites, extent and location of facilities, and degree of controls applied to activities such as vehicle use, open and closed areas of use, and physical developments." Although we appreciate NPS' attempt to describe some of the less tangible differences between Wilderness and non-wilderness management, we believe this statement requires further elaboration. Title XI provides a procedure for "road locations and mileage" to be reviewed and approved irrespective of Wilderness designation. In addition, Title XI and NPS regulations guarantee that certain modes of access will be allowed by NPS, subject to reasonable regulation. These regulations must be based on findings of actual impact to park resources. Wilderness designation in and of itself in Alaska should not result in controls being applied to "activities such as vehicle use"

and "open and closed areas of use."

- 15) The EISs consistently dismiss many of the issues raised during the "scoping" meetings for these EISs. We suggest that, prior to preparation of the final EISs, NPS again review the issues raised by the public. Many of these issues are of significant concern to Alaskans, and we believe additional response to them is appropriate.

#### PAGE-SPECIFIC COMMENTS

Page 5, third paragraph. This paragraph indicates that 62% of the park and preserve was found suitable for Wilderness. This statement should be clarified to acknowledge the additional 35% of the park and preserve is already covered by Wilderness designation.

Page 8. Paragraph 3 states "ANILCA 701(1) designated . . . Denali National Park as wilderness, to be managed in accordance with provisions of the 1964 Wilderness Act." We recommend this statement be expanded to acknowledge that management of wilderness in Alaska is modified by various provisions in ANILCA.

Page 9, last paragraph. This paragraph notes that "there are approximately 25 potential RS 2477 rights-of-way in the study area, and should any of these be validated, they will become ineligible for Wilderness designation." The paragraph should go on to clarify how that process would be applied to RS 2477 rights-of-way which are determined to be valid after Wilderness has already been designated. For example, would affected lands be withdrawn from Wilderness designation? The state believes it would be more appropriate to exclude possible RS 2477 rights-of-way from Wilderness designation in the first place. In addition, it should also be made clear that waters determined to be navigable in the future would automatically be excluded from Wilderness.

Page 19, first paragraph. This paragraph states that future mining is anticipated to occur only in the Kantishna mining district. The Dunkle area also offers significant mineral potential and is covered by existing claims. It, too, should be addressed here as well as under alternatives 2, 3 and 4.

Pages 18, 24 and 28, Use of the Stampede Trail. According to the Alaska Department of Transportation and Public Facilities, the implied current level of use (ten trips per year) of the Stampede Trail in the park is much too low. It is probably not uncommon for that many trips to occur within a single weekend during the spring season. Where such volumes of use are indicated, they

should be documented.

Page 19. We suggest that the bottom paragraph of this page be revised to reflect the current status of state/federal efforts with regard to south-side development.

Page 44, Subsistence Use. The text accurately lists the resident zone communities for Denali National Park. It would, however, be appropriate to delete reference to the preserve and to clarify that only the Denali Park Addition is involved. In addition, those who, in the recent past, were authorized to hunt and trap in the park on a permit basis are not mentioned. We request that the plan indicate whether any NPS permits are currently being issued to people outside the resident zone communities, who otherwise are qualified to hunt or trap in the park addition.

Page 45, first full paragraph and Table 4. We request that the text clarify what area is included in the "Annual Regional Harvest" column. The following questions would be appropriate to address. Do the estimated harvest levels refer only to the resident zone communities? If so, are the harvested estimates only for the park area, or for all areas used by the community? If data are presented only for resident zone communities, why are other local communities like McKinley Park and Healy excluded? Do the harvest figures include data for residents of Kantishna?

The 1984 Alaska Department of Fish and Game (DFG) reference cited in the bibliography on page 197 clearly indicates that more than the five caribou indicated in the EIS were taken during a recent regulatory year by Cantwell residents alone. DFG also believes the estimated moose harvest levels that are cited in the EIS are too low. Nikolai and Telida alone have taken between 50 and 70 moose annually since the mid-1960s. (See page 113 of Jeff Stokes, "Natural Resource Utilization of Four Upper Kuskokwim Communities," DFG/Division of Subsistence Technical Paper No. 86, Juneau, Alaska, 1985.) Without further documentation, we cannot accurately evaluate the "park/preserve portion" harvest estimates cited in Table 4, and suggest that such figures should not be presented without further explanation of how they were developed. Our concern is that they could be used to arbitrarily establish harvest ceilings within the park addition and preserve at some future point.

As we have noted in previous comments, the information presented in table 4 does not depict the "overall pattern of subsistence resource use . . ." Instead, only estimated harvest levels are presented. A discussion of subsistence patterns would involve examining such topics as seasonality of harvest, harvest methods, means of access, processing and preservation techniques, and sharing and exchange of resources.

Page 46, Subsistence Map. We are curious to know why furbearer trapping areas are depicted rather than hunting areas or all areas used by local communities. It is also unclear why areas for Healy are shown on this map when no other discussion in this section pertains to Healy. Furthermore, it is unclear what communities are contained in the "other" designation on the map. There is also some question whether areas used by McKinley Park and Kantishna residents are identified on the map. The source or sources of information are also not identified on this map and the text lacks any associated discussion. We recommend the NPS clarify these concerns in the final EIS.

Page 47-48. The description of "Recreation and Visitor Use Trends" would be more comprehensive by adding several additional recreational activities that occur in Denali. Additional activities that need recognition here include hunting, fishing, trapping, and camping particularly in the preserve and park additions. We note that these uses are listed on page 49 under the discussion of the economy.

Pages 72-73, Alternative 2; pages 81-82, Alternative 3; and pages 81-88, Alternative 4, Impact on Subsistence. The fact that an estimated 1/4 or less of the subsistence harvests of the four resident zone communities occur within the preserve and park addition might imply to some readers that the park unit is of minor importance to local rural residents. In fact, no discussion is provided which describes resource harvest patterns for the resident zone communities. The final EIS should recognize that the park unit may be especially important to certain communities or to certain households in the area.

Page 91-94, Issues Dismissed in Scoping. We recommend that the final EIS address the effects of Wilderness on subsistence use of ORVs. Use of ORVs for subsistence purposes within Denali is recognized in paragraph 5 on page 92.

Pages 102-105, ANILCA 810 Evaluation. Mountain goat harvest should be deleted from this table because goats do not occur in the Denali National Park.

A six-fold increase in sport hunting effort in the preserve seems to have the potential to generate increased competition with local rural residents over time. More discussion concerning current sport hunting and where it occurs in relation to subsistence hunting would facilitate better analysis of this important relationship.

Page 105. Paragraph 1 makes reference to the Yakutat area and obviously is out of place in this EIS.

Page 107. Bibliography. Steve Behnke authored the 1977c report attributed to Richard Bishop under the University of Alaska entry.

On behalf of the State of Alaska, thank you for the opportunity to review this draft EIS. 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



By Michelle Sydeman  
CSU Coordinator

cc: Commissioner Judy Brady, DNR  
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