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April 5, 1991

Sharon Kliwinski
National Park Service
Mining and Minerals Branch
WASO 660
P.O. Box 37127
Washington, D.C.

Dear Ms. Kliwinski:

The State of Alaska has received the proposed rule at 36 CFR part 9, subpart B (Federal Register, March 8, 1991) concerning the Alaska Mineral Resource Assessment Program (AMRAP). This letter represents the consolidated comments of the State's resource agencies.

While the State has few substantive comments on the regulations themselves, we are disturbed in principle by the compressed public comment period and the virtually nonexistent timeframe scheduled for consideration of public comment prior to publication of the final rule. It appears that the National Park Service and the Department of the Interior are not interested in seeking meaningful public involvement.

It has been over 10 years since passage of the Alaska National Interest Lands Conservation Act, including the Section 1010 provision requiring regulations. Under these circumstances it is puzzling why these regulations are being rushed through public review. We understand that there have been internal problems causing delays in getting these regulations out. Unfortunately, the time spent in this interagency debate has occurred at the expense of public review.

For future reference, the State reminds the Department of the Interior and the National Park Service of a June 4, 1987 recommendation made by the Alaska Land Use Council. In their unanimous decision, the Council "urges all federal and state agencies to, whenever possible, issue legal notices in the Federal

Ms. Sharon Kliwinski
National Park Service

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Register and the Alaska Administrative Journal respectively, with a minimum comment period of 45-60 days, which would provide additional time that is often required for communication in Alaska".

Regarding the proposed regulations themselves, the State finds them acceptable as long as they apply only to lands under National Park Service management. Since minerals on national parklands are already managed so restrictively, there would be little to gain by liberalizing the AMRAP program on parklands. The State, however, would be vehemently opposed to application of this rule on other federal lands in Alaska.

Finally, Section 9.81 states that "AMRAP activities shall be performed in accordance with ANILCA,..." The State presumes this means that any required Section 810 analyses will be conducted.

Thank you for the opportunity to submit these comments. If you have any questions, please call me at 465-3562 or Sally Gibert at 561-6133.

Sincerely,



Paul C. Rusanowski, Ph.D.
Director

cc: Judy Alderson, National Park Service
Boyd Evison, Regional Director, National Park Service
Curtis V. McVee, Department of the Interior
Harold Heinze, Commissioner, Department of Natural Resources
Carl Rosier, Commissioner, Department of Fish and Game
John Sandor, Commissioner, Department of Environmental
Conservation
Frank Turpin, Commissioner, Department of Transportation &
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**ALASKA MINERAL RESOURCE ASSESSMENT PROGRAM
DISTRIBUTION LIST**

April 5, 1991

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Ron McCoy, Alaska Land Use Council, Anchorage