

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

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May 20, 1988

Mr. Walter O. Stieglitz  
Regional Director  
U.S. Fish and Wildlife Service  
1011 East Tudor Road  
Anchorage, AK 99503

Dear Mr. Stieglitz:

The State of Alaska has reviewed the draft Comprehensive Conservation Plan (CCP) for the Alaska Maritime National Wildlife Refuge. This letter is submitted on behalf of state agencies and represents a consolidation of agency comments and concerns. Given the dispersed nature of the refuge, we appreciate the U.S. Fish and Wildlife Service (FWS) efforts to produce such a comprehensive plan.

### Alaska Coastal Management Program

The consistency determination which is normally located in the Appendix of each CCP (e.g., ANWR, page 451) has been inadvertently omitted. We are aware, however, that the FWS has determined that the plan is consistent with the Alaska Coastal Management Program. To assist in preparation of the final CCP, we have provided, under separate cover, a current status report of coastal district implementation of the ACMP. In the interim, the state has completed an advisory consistency review of the plan. Based on the information presented, it appears that the plan will be consistent with the ACMP. A conclusive review will be made after the final CCP has been issued for public review.

### Shorelands, Tidelands, and Submerged Lands

On page III-38, the CCP acknowledges that the state and the FWS disagree over the ownership of certain tide and submerged lands adjacent to the refuge. We request inclusion of a discussion about how these lands will be managed in light of this disagreement. The state has previously suggested the plan discuss pursuit of cooperative agreements when a case-by-case resolution of management issues proves unacceptable to the FWS and the state. Therefore, the state recommends that the following language be included to provide direction to managers in the event that conflicts arise.

"The FWS and the State of Alaska disagree about who owns tide and submerged lands around           (location)          . Based on the Equal Footing Doctrine, the Submerged Lands Act of 1953, and Section 6(m) of the Alaska Statehood Act, the state asserts that it owns all tide and submerged lands adjacent to the refuge, including those lands adjacent to           (location)          . The FWS acknowledges that the state owns all tide and submerged lands, with the exception of those lands adjacent to the           (location)          . The FWS asserts ownership of the submerged land           (location)           based on a pre-statehood withdrawal which has been interpreted by the Department of Interior Solicitor's Office to preclude the passage of title to submerged land to the State of Alaska at the date of Statehood.

"The U.S. Supreme Court recently ruled in a case involving Utah Lake that pre-statehood withdrawals do not defeat the state's title to tide and submerged lands. The state currently is involved in litigation with the federal government on a similar issue on the North Slope which should provide the basis for resolving this ownership question.

"The FWS and the state acknowledge their disagreement on this issue. Until ownership is decided, the FWS agrees to work with the state to manage these lands. The state has expressed a corresponding willingness to work with FWS. Cooperative management agreements may be pursued by either the state or FWS when a case-by-case resolution of management issues proves unacceptable to either party."

The state is concerned about restrictive classifications of refuge uplands adjacent to state-owned tide and submerged lands, as well as those tide and submerged lands where ownership is in dispute. The Department of Natural Resources (DNR) expects that over the next 20 years it will receive an increasing number of requests for use of tidelands for commercial development, e.g., fisheries processing plants and mariculture. Since the state has the ability to issue permits and leases for use of tidelands, conflicts may develop with the upland refuge land classifications. The state is particularly concerned about this issue at Afognak Island, Middle and Women's Bay near Kodiak, and Semedi and Simeonof Islands where permits and leases are most likely to be requested.

For land use activities requiring authorizations for both uplands and tidelands, the state and FWS should coordinate. The relationship between FWS (the upland owner) and DNR (the

tideland and submerged landowner) needs to be clarified in the common management direction section of the plan. Whether or not there is a dispute over ownership of tidelands, the state recommends that the state and FWS pursue cooperative agreements when a case-by-case resolution of an issue proves unacceptable to the state or FWS.

#### Semedi, Simeonof, Kodiak, and Afognak Islands

On pages II-256, II-264, and II-302, the plan says the state disagrees that FWS is responsible for management of tide and submerged lands adjacent to these islands. The state would like to stay on record with this disagreement and encourages the FWS to reference the previous language in these locations. This language should also be included or referenced in the discussion of the preferred alternative on pages III-80 through 87. During the scoping phase of this plan in late 1987, the state also submitted extensive comments regarding state assertion of ownership of areas surrounding Kodiak Island, Women's Bay, and Wolcott Reef to Sturgeon Lagoon.

The state requests that there should be greater consistency between the Kodiak refuge and the Maritime refuge CCPs. Specifically, we request that all Minimal Management areas in the Maritime refuge that are adjacent to the Moderate Management uplands on the Kodiak refuge be classified as Moderate Management.

At Women's Bay, the Kodiak Island Borough is particularly concerned that the plan, as written, will preclude the development of a public sewer system. We request that a special provision be made for effluent discharge in Women's Bay regardless of how the bay is classified. State and federal permitting agencies should be allowed the opportunity to cooperate with the Borough in the design of a system which will not degrade the marine environment.

As explained above, the state believes that the FWS does not have jurisdiction or management authority seaward of the mean high tide line in the refuge. However, since this has not been affirmed by the courts, the state offers the remaining comments on the plan as currently written.

#### Mariculture

The state supports the FWS's plan to provide opportunities for mariculture on the refuge, subject to applicable law and a compatibility determination. However, the FWS has not developed compatibility criteria for analyzing individual mariculture projects on federal lands. Objective criteria are needed to ensure that the permitting process is

uniformly administered and to provide a basis for compatibility determinations. We urge the FWS to develop such criteria as a priority component of step-down planning for the refuge. A state mariculture policy is being developed through the administrative and legislative processes. Detailed permitting criteria will also be developed by the state for the siting and approval of mariculture activities on state lands. We believe that any criteria established by the FWS should be coordinated with state permitting requirements for state-owned tidelands.

The state also requests that coastal areas adjacent to protected bays on Unalaska Island be classified moderate management to provide opportunities for on-shore support of mariculture activities on adjacent state tidelands. These areas, currently proposed for Minimal Management, have many of the same characteristics as the Kodiak Archipelago. While the state has no specific plans to develop mariculture in these areas, we believe that the option should remain available.

Since there is still little information available on a statewide basis regarding suitable mariculture sites, the state recommends that the FWS take a close look at mariculture potential during the three-year revision process, including looking at requests from the public. The Shumigan Islands should be studied in this context. The state also requests a commitment in the CCP that during the revision process, any Minimal Management areas with newly-identified mariculture potential be reclassified to permit mariculture unless specific biological factors suggest otherwise.

In the discussion of mariculture on page II-85 of the CCP, the terms "aquaculture" and "mariculture" appear to be used interchangeably to describe the same activity. We request that the FWS clarify the meaning of these terms if they are not intended to be synonymous. Commonly "aquaculture" refers to fresh water activities while "mariculture" refers to marine activities.

### Fisheries

According to Vol. I, page I-39, "Shore-based facilities in support of commercial fishing would not be permitted in designated wilderness." As previously noted, we believe this policy is inconsistent with ANILCA 304(d), which states that the Secretary "shall permit . . . the exercise of valid commercial fishing rights or privileges obtained pursuant to existing law and the use of Federal lands, subject to reasonable regulation . . . ." This intent is also reflected in ANILCA Section 1316(a):

"On all public lands where the taking of fish and wildlife is permitted in accordance with the provisions of this Act or other applicable State and Federal law the Secretary shall permit, subject to reasonable regulation to insure compatibility, the continuance of existing uses and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities." [Emphasis added.]

Accordingly, we believe that commercial fishing is permissible in both Wilderness and non-Wilderness portions of the refuge.

As previously mentioned, the state does not acknowledge FWS jurisdiction of off-shore submerged lands and waters. Even if the courts determine that FWS has such jurisdiction, however, the state believes that the above ANILCA provisions apply to Wilderness waters as well. Thus the state does not agree with the statement on page III-3 that "In marine environments, commercial fishing is not permitted" (in designated wilderness areas). This comment also applies to the "Commercial Fishing" language on page III-11.

In Vol. II, page III-13, the CCP references a desire to seek cooperative agreements with the state for management of commercial fishing. The state manages these fisheries in a manner which, to our knowledge, is satisfactory to the FWS. The need for formalized cooperative agreements should therefore be addressed if the existing memorandum of understanding with the Department of Fish and Game (DFG) is not adequate.

We also believe that the fisheries management concepts contained in Vol. II, page III-23, are premature and should more appropriately be established during the development of the refuge step-down fishery management plan.

In addition, the state reiterates its request that the CCP clarify that the FWS has the discretion to allow limited use of motors (e.g., chainsaws and generators) within Wilderness areas, if such use was established prior to designation of the area. (See 50 CFR 35.5). We note that the Alaska Land Use Council, at its meeting on November 24, 1987, unanimously urged the FWS to maintain flexibility to allow limited use of mechanized equipment where necessary to support traditional activities, and where it would not significantly detract from Wilderness values within a Wilderness, and where such uses occurred prior to 1980, consistent with FWS regulations.

### Public Participation

The state appreciates the FWS commitment to include public participation in all phases of preparation, revision, and implementation of the CCP, as reflected in the statement in Vol. I, page I-12: "Public involvement and cooperative planning efforts are continued through the completion of the detailed management plans." However, Vol. I, page I-10 states that public involvement in step-down plans will be sought where "management plans deal with a subject of known special interest or controversy." (Similar language occurs in Vol. II, page III-43). The state urges the FWS to solicit public participation for all step-down management plans since public interest and controversy can be difficult to anticipate.

### Geothermal Resources on Atka Island

Recent information compiled by John Reeder, Alaska Division of Geological and Geophysical Surveys, indicates additional geothermal resources beyond those reported on pages II-203 to 204. Based on field work in 1983, Reeder found six previously unreported, active fumaroles and/or hot-spring fields on the northern part of the island which are proposed for Wilderness designation. Reeder describes them as "probably some of the best hydrothermal resources in Alaska." The northern part of Atka Island is the largest volcanic center for the central Aleutian Islands, possibly with a large water-dominated reservoir in the Mount Kluichief region. The principal resource area according to Reeder's report is circled on the attached map.

For more information, please refer to the following:

Reeder, J.W., Hydrothermal Manifestations of the Northern Part of Atka Island of the Aleutian Arc, and their Geologic and Tectonic Setting, Abstracts and Time Schedule for IAVCEI 1985 Scientific Assembly.

There may be some long-term interest in developing these geothermal resources through a land exchange. Wilderness status in this area would likely inhibit an exchange, therefore we request the area be deleted from the Wilderness recommendation.

### Access

In several places (i.e., Table 34; pages III-21; III-68; and III-69), the CCP indicates that low flying aircraft could adversely affect bird populations and habitat and therefore reasonable regulations could be imposed on aircraft operations in the future. If such regulations are

developed, they should not compromise safety. Regulations should not prohibit flying close enough to the coast to maintain visual bearing. This is especially important during marginal weather when the ability to navigate by the coastline is critical. A statement in the plan addressing this situation would be helpful.

Page III-18, second paragraph. The last sentence of this paragraph incorrectly notes that the road across the Safety Sound parcel does not have an official right-of-way. The road is part of the Nome-Council Highway and is on the Federal Aid Secondary Highway System (FAS-130). Public Land Order 601 (8/16/49) established a 200-foot wide right-of-way for the route. Subsequent PLO's and executive orders retained that right-of-way. The Statehood Omnibus Act Quit Claim Deed transferred the right-of-way to the state in 1959.

Page III-45 - Safety Sound Barrier Island. This table refers to the "road bed" which will be subject to Intensive Management. We request that the phrase "road right-of-way" be substituted since it more accurately reflects the property interest involved and avoids potential administrative problems with routine activities, such as snow plowing and ditch maintenance. The Federal interests in the land within the entire width of the right-of-way should therefore be classified for Intensive Management.

We commend the FWS for recognizing, and designating routes for, traditional use of ORVs. We request that the FWS clarify how the traditional use areas identified on page III-25 were derived. We also request that this paragraph acknowledge that new routes could be designated if new information showed additional traditional useage. This provision should also apply to designated Wilderness.

### Cabins

We request that Table 34 in Vol. II (page III-7) indicate that cabins are not for private recreational use. In addition, there may be cabins on the refuge which are not currently under permit. The state encourages FWS to allow intermittent, public use of such cabins on an informal basis for authorized refuge activities. The National Park Service has adopted a policy which allows such use in the Gates of the Arctic National Park and Preserve. (See Gates of the Arctic General Management Plan, page 158).

### Maps and Land Status

The location maps need to distinguish between uplands and tide and submerged lands. To do this, the map notes on

pages II-111, II-143 through 145, II-182 through 184, II-257, and II-303 through 305 should be changed to read:

Note: Refuge area shown in black; the refuge includes uplands on offshore islands, islets, rocks, reefs, and spires.

We appreciate the references to state-owned lands in the legend to the land status maps (pages II-112, II-147, II-186, II-258, and II-306). However, the maps (and legend) would be more clear if they simply contained a note stating that all tide and submerged lands adjacent to the refuge uplands are state owned. It would also be helpful to define these terms in the note. Tidelands are lands subject to tidal influence. Submerged lands are lands seaward from tidelands. This comment applies to the maps located on pages II-111 through 118, II-148 through 155, II-186 through 263.

The tables and discussions of land status should include a statement that all shorelands within the refuge, and tide and submerged lands adjacent to refuge uplands are in state ownership. This statement should be included in the discussion and the tables on pages II-110, II-146, II-185, II-256, II-264, II-302, and II-317.

The map on page II-145 shows Nunivak Island as part of the Yukon Delta National Wildlife Refuge. The boundary includes tide and submerged lands that the state asserts are in state ownership. As previously discussed, this boundary should be drawn to include only the uplands on the island, or alternatively, a footnote should be added to the map that clarifies the status of land ownership of tide and submerged lands adjacent to the refuge.

The FWS should include in its land status discussion for each unit of Wilderness a statement that shorelands within the unit and tide and submerged lands adjacent to a unit are in state ownership.

DNR is currently researching the land status and refuge boundary of Chamisso Island (page II-117), the former Bering Sea NWR (page II-316), Pribilof Reservation (page II-155), Hazy Island (page II-316), and St. Lazaria (page II-316). The state may submit additional comments on these areas at a later date.

Pages III-59, III-73, III-83 - Figures depicting land use designations around Afognak Island should be corrected to indicate that Afognak Lake is not tidal, and that it is not a component of the Alaska Maritime Refuge.



Page II-308 - In light of the reference to Sturgeon Lagoon on page III-25, we suggest that this place name be identified on the corresponding map on this page.

The maps on pages II-308 and II-309 should include a footnote that acknowledges there is a disagreement over the ownership of these lands.

#### Fish and Wildlife Management

We recommend deletion of the following statement in Vol. II, page III-19: "ANILCA obligations to maintain natural diversity by managing indigenous populations so that they do not decline unnaturally below the levels that existed on December 2, 1980 . . . ." We recommend deletion of this statement since the FWS and the DFG should not be bound to an artificial population goal, and ANILCA does not specify management be based upon any single year (1980) population level. In addition, we note that there is little data documenting "natural population levels" and/or levels in 1980.

For consistency, and to clarify that trapping is managed independently of subsistence or recreational uses, we request that "trapping" be added to discussions of hunting, fishing, subsistence, and recreational uses in the following locations: Vol. I--xx, Alternative A paragraph 2; xxi, Management Directions, 8th o; xxv, Alternative B, paragraph 2; xxvi, Management Directions, 8th o; xxxi, Alternative C, paragraph 1; xxxi, Management Directions, 7th o; I-44 through I-45; Vol. II--xix, Common Management Directions, 6th o; III-28, paragraph 1; III-44, Alternative A, paragraph 2 and 7th o; III-70, Alternative B, paragraph 2 and 8th o; III-80, Alternative C, paragraph 2 and 7th o.

#### Subsistence/Section 810 Evaluations

We appreciate the FWS acknowledgement in the Section 810 evaluation of the need to conduct additional assessments if future actions are proposed which might affect subsistence uses.

The CCP has not identified all communities that are known to use the refuge for subsistence purposes (see page-specific comments that follow). This is symptomatic of our general concern that Section 810 evaluations often appear to lack adequate background information for the communities and areas affected, making it difficult to accurately assess impacts on subsistence uses. Alaska Land Use Council (ALUC) guidelines for Section 810 evaluations also call for complete background data.

Page I-27 - Subsistence Monitoring. The second sentence might be more accurate as follows: "Subsistence uses of migratory birds in Alaska have been poorly documented in the past, and only recently have harvest monitoring programs been implemented in some areas for some species."

Page II-130 - Communities. Mapped information recently developed for the state's Northwest Area Plan indicates that the Maritime refuge has been used for subsistence by the communities of Kivalina, Buckland, Noatak, and Noorvik. We recommend the latter three communities be added to the list of those communities presented in the third paragraph. Additional information regarding communities that use the refuge and adjoining areas may be obtained from DFG through the FWS/DFG liaison. The following published source materials are also available from DFG:

Schroeder, R.; D. Andersen; and G. Hildreth. 1987. Subsistence Use Area Map Atlas for Ten Kotzebue Sound Communities. DFG, Division of Subsistence and Maniilaq Corporation. Juneau.

Alaska Department of Fish and Game. 1985. Alaska Habitat Management Guide - Arctic Region. Habitat Division. Juneau.

Page II-169 - Bering Sea Unit, Communities. The DFG Habitat Management Guide for Southwest Alaska indicates that the refuge has also been used for subsistence purposes by the communities of Twin Hills, Manokotak, Clarks Point, and Aleknagik. We recommend specific mention of these communities since documentation of their use of the refuge is available.

Page II-180. Kikegtak Island, et al. In 1987, the Alaska Board of Fisheries created the Cape Avinof herring fishery. The district boundary for this fishery includes the Pingurbek, Kikegtek, and Kwigluk islands.

Page II-236 - We appreciate the comparatively detailed discussion of subsistence uses in Unalaska. Wherever possible, we request that discussion of other communities receive similar attention. We also hope subsistence use studies are given high priority in refuge management and in step-down planning.

Page II-334 - Subsistence. A more current source of information on subsistence uses on Kodiak Island is: Kodiak Area Native Association (KANA), December 1983, Kodiak Island Area Local Fish and Resource Guide (96 pp.). This report was prepared by KANA with assistance from DFG Division of Subsistence and the Bureau of Indian Affairs.

Page II-341 - Sitka, Subsistence. We suggest that the FWS refer to the Division of Subsistence Technical Paper No. 90 for information on resource uses in Sitka. Maps in this report indicate that the southern portion of Kruzof Island and the Sitka Sound areas are harvested by Sitka residents. Specific attention is not given to St. Lazaria Island, but we recommend that the documentation of subsistence uses near the refuge be noted in the CCP, particularly since management actions on the refuge or in adjacent areas may affect overall patterns of subsistence harvest and use.

Pages III-24 through III-26 - Subsistence. We appreciate the FWS commitment to working cooperatively with DFG in its subsistence monitoring efforts. In some instances, however, baseline community harvest data will be required before effective and meaningful monitoring efforts can be initiated. Baseline biological and population data are also necessary prerequisites for decisions concerning harvest regulations.

Page IV-3 - Environmental Consequences, Subsistence 810 Evaluation. We suggest that the second sentence of the third paragraph be revised to read, "continued access of local rural residents . . . ." This wording will more accurately reflect the composition of rural communities being referred to in this section.

### Geology

In general, sections on geology could be improved by modifying the technical language so that the discussion is more comprehensible to the general public. More frequent and updated references would also assist those readers who wish to research the topic more thoroughly. We have informally provided some suggestions for improving these technical discussions.

Page II-89, paragraph 1 - We request that the second sentence be revised as follows: "The exploration process involves preliminary geophysical (seismic) exploration with vessels." The CCP's use of 'usually' and 'some' in this sentence gives the impression that such activity is optional. No exploration for oil and gas by drilling would exclude such initial geophysical exploration. For clarity, we also suggest that the order of sentences 1 and 2 be reversed.

Page II-90, last sentence - For clarity, we suggest this sentence be re-phrased as follows: "Typically, there is low probability of finding enough oil resources to be developed in most of the new lease areas." Then the next sentence at the top of page II-91 could be restated: "For example, there

is only a 20 percent chance of sufficient oil and gas resources for development in the North Aleutian Basin, which is near Unimak Island." We also request that a reference be cited for the probability value.

Page II-119, paragraph 3 - A figure showing these Chukchi Sea geological features would be helpful.

Page II-120, paragraph 2 - The third sentence indicates occurrences of "Limestone of possible cement grade". We suggest that this information be accompanied by a reference.

Page II-202, paragraph 7, sentence 3 - We suggest that a citation be provided for this reference of undiscovered recoverable oil and gas resources.

Page III-29, paragraph 5 - It would be helpful to specify the percentage of the refuge that will be in Wilderness if the areas proposed are designated.

#### Grazing

Grazing occurs on several of the islands within the Alaska Maritime Refuge. Page III-9 says that no new or increased levels of grazing will be permitted, however existing grazing is not addressed. We therefore request that Table 34 be modified to include how existing grazing will be managed. By implication it appears that grazing will be allowed to continue at its existing levels in those areas currently used for this purpose.

#### Kodiak Island Borough Comments


The Kodiak Island Borough has submitted extensive comments on the Alaska Maritime CCP. A number of the Borough's concerns are shared by the state, as reflected in this letter. We urge the FWS to carefully consider the Borough's comments and foster a close working relationship with them as the plan is finalized and implemented.

May 20, 1988

On behalf of the State of Alaska, thank you for the opportunity to review this draft. If we can be of assistance in clarifying these comments, please contact this office.

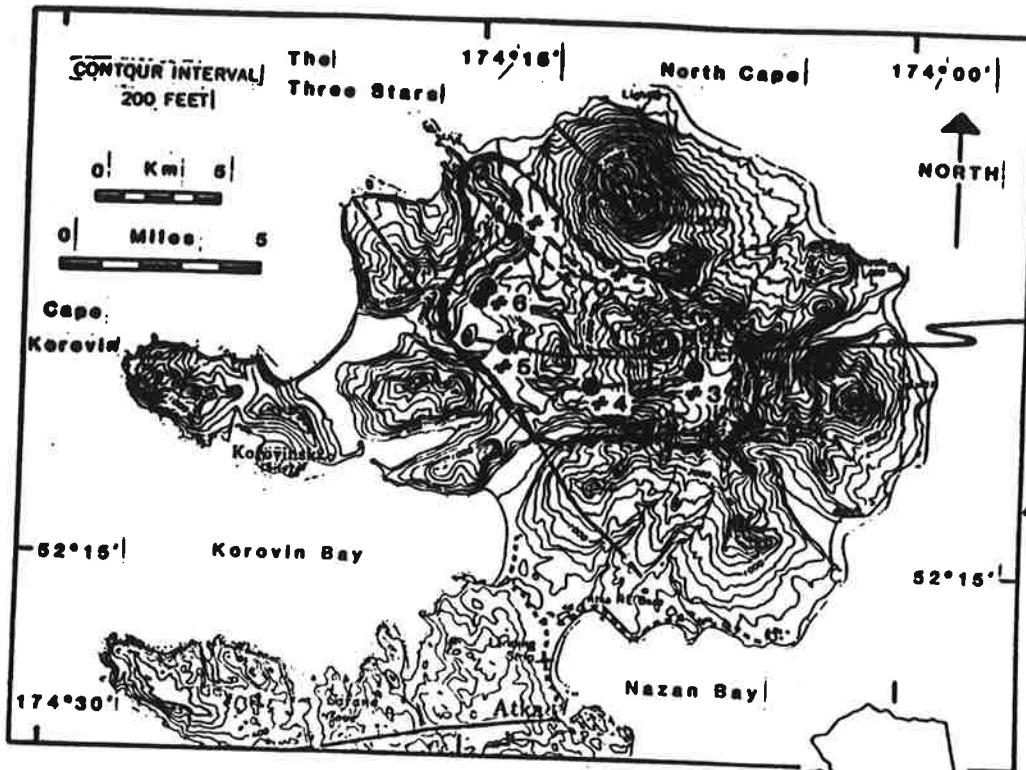
Sincerely,

Robert L. Grogan  
Director



by: Sally Gibert  
State CSU Coordinator

cc: Commissioner Judith M. Brady, DNR  
Commissioner Don W. Collinsworth, DFG  
Commissioner Dennis D. Kelso, DEC  
Commissioner Mark S. Hickey, DOT/PF  
Mr. Rod Swope, Office of the Governor



*Area of principal geothermal resource potential*

**Map Symbols**

- Fault: dashed where approximate
- Fumarole field
- ⊙ Warm and/or hot springs
- ☼ Caldera



**NORTHERN PART OF ATKA ISLAND**

TITLE: Alaska Maritime NWR draft CCP

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[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  
[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  
[9] Ms. Nancy Holguin, Division of Governmental Coordination, 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: Alaska Maritime NWR draft CCP

- [847] Mr. Curtis McVee, Alaska Miners Association, Inc., Anchorage
- [182] Ms. Jan Mills, Division of Governmental Coordination, Juneau
- [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
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- [87] Dr. Lidia Selkregg, Land Use Advisors Committee, Anchorage
- [1495] Mr. Robert Senner, Anchorage
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- [948] Mr. Walt Sheridan, U. S. Forest Service, Juneau
- [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