

# 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 Kobuk Valley 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 Recommendation; 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 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.

#### THE KOBUK VALLEY WILDERNESS RECOMMENDATION

The State of Alaska opposes designation of additional lands within the Kobuk Valley National Park as Wilderness.

#### Rationale:

- 1) Wilderness designation of the Salmon River drainage would increase the difficulty involved in gaining federal approval for a potential access route from the Red Dog port facility to the Ambler Mining District. Given the scope of the Ambler District mineral deposits and the likelihood that they will be developed, the state can not support adoption of a land use designation which could complicate development of the access route.
- 2) Consistent with the state's concern with the effects of land management decisions on local residents, we note that residents of northwest Alaska do not appear to favor designation of additional Wilderness lands. At the public meeting the NPS held on July 29, 1988, in Kotzebue, local residents as well as representatives of the Northwest Arctic Borough, Maniilaq Association, and NANA Regional Corporation spoke against additional Wilderness. In addition, many local residents expressed concern at the public meeting on July 28 in Kiana about the effects of Wilderness designation on their traditional lifestyles.
- 3) The state is concerned that, over time, NPS may manage traditional subsistence, recreational and commercial uses in designated Wilderness areas more stringently than is currently envisioned by the NPS or described in the EIS. We are concerned that rural Alaskans who use the park will see rights and opportunities accorded to them under ANILCA (e.g., use of snowmachines, motorboats, and airplanes) eroded as the NPS responds to pressures from other park users.

- 4) Wilderness management of lands adjacent to the Kobuk River could be complicated by the presence of 13 native allotments and extensive motorized traffic along the Kobuk River. The state does not believe Wilderness designation would be appropriate in this highly used area.

In addition, the state owns and has management authority over the submerged lands (shorelands) and associated watercolumns of the navigable Kobuk River. Designation of adjacent uplands as Wilderness could increase the potential for state/federal management conflicts.

Recommendation:

Modify the existing wilderness boundary to following hydrographic and topographic features. (See enclosed map.)

Rationale:

- 1) Section 103(b) of ANILCA states congressional intent that "whenever possible boundaries shall follow hydrographic divides or embrace other topographic or natural features." The NPS took advantage of the opportunity provided by Section 1317 of ANILCA and included recommended Wilderness boundary adjustments in its Wilderness EIS for the Wrangell-St. Elias National Park and Preserve. The state supports this approach and requests that revisions to the Kobuk Valley Wilderness boundary be recommended in this EIS.
- 2) The entire northern Wilderness boundary is not field locatable.
- 3) This Wilderness area was established by Congress to give maximum protection to the Waring Mountains and the Great Kobuk Sand Dunes. The state's proposed boundary adjustment would not affect the level of protection provided to these two features.

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. 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 that 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 fails 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, the 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 EIS 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 9. The Kobuk River is also used as a transportation corridor for access by ORVs and dog sleds during winter.

Pages 37 and 38. The Kotzebue population is given as 3,600 in 1987 on page 37, and 2,633 on page 38 and elsewhere. We suggest that this discrepancy be resolved.

Page 39, Subsistence Map. The same map appears in the Cape Krusenstern and Noatak EISs, and does not accurately depict areas used for subsistence purposes by local communities. Current mapped data are available for all resident zone communities except Kotzebue and appear in: Robert Schroeder, Dave Andersen, and Grant Hildreth, "Subsistence Use Area Map Atlas for Ten Kotzebue Sound Communities," DFG/Division of Subsistence, Juneau, Alaska, and the Maniilaq Association, Kotzebue, Alaska, 1987. An accompanying report by the same authors is: "Subsistence Use Area Mapping Ten Kotzebue Sound Communities," DFG/Division of Subsistence Technical Paper No. 130, Juneau, Alaska, 1987. These references may not have been available to the NPS when this EIS was drafted, but we do recommend that they be used to more accurately portray subsistence use areas. The present map also

lacks sufficient qualifying information to allow the reader to evaluate the data presented, such as the time period covered and the data collection methods.

Page 41, Table 3. This table does not accurately depict "estimated average annual subsistence use pattern" for the region. Interestingly, the "estimates" are quite specific (e.g., 5,028 waterfowl and 2,477 caribou, rather than 5,000 and 2,500, respectively). The EIS should include background about the population base and geographic area included in the "regional harvest" column, and indicate which published sources of information were consulted. Since harvest levels for some species can vary considerably from year to year (as noted in the EIS), we recommend that harvest ranges be presented. Once again, our concern is that numbers in this EIS at some future point could be used as a basis for establishing harvest ceilings within the park unit, which would not be prudent. With the exception of recent subsistence harvest data collected for Kotzebue, we are unaware of current harvest data sources for other resident zone communities for this park unit; hence, our desire for more specific information on how these figures were developed.

Page 41, Table 4. The accuracy of the percentages in this table are linked directly to the accuracy of the harvest estimates in Table 3, which we think may not be accurate. (See comments above.)

Page 42. Coal gathering (paragraph 7) by local residents within the park is not noted on the map of use areas (page 39). We suggest this use be included on the map to show that "coal or wood gathering" occurs within the park.

Page 45, third paragraph. The NPS estimates that public use of the park will reach about 3,554 recreation visits in the year 2020. However, on page 67 in the first sentence, the NPS estimates no significant increase in the number of recreation/sport fishing visits by the year 2020 above the current average of 50 per year. We recommend the NPS reconcile this discrepancy in the final EIS.

Page 48-49. The proposed airstrip at the confluence of the Salmon and Nikok rivers appears in the GMP as a smaller, user-developed and maintained facility. In Alternative 1 of the EIS, it is NPS-developed and maintained. The description of the strip in the impacts section on pages 48-49 conveys the impression that the airstrip would be more intrusive than envisioned by the state. The area in question is already accessible to aircraft, with landings being made on gravel bars or ridge tops.

Page 51. As previously stated during our review of the Kobuk GMP, we are concerned with the hypothetical development of a permanent ranger station "near Onion Portage", and would oppose this until a cooperative management strategy for the area has been developed.

Page 55, Alternative 3. Our concerns with this alternative focus on the fact that there are 81 Native allotments and 30 cabins situated along the Kobuk River. This river corridor is not "pristine" wilderness, but wilderness designation might well create expectations among recreational users that would not be fulfilled. This in turn could create pressure on local NPS managers to restrict local use, and on the NPS to purchase private lands.

Pages 58-59. The issues raised during scoping are of obvious concern to the affected public and state. However, most of these issues were dismissed by the NPS. We believe several of these issues do have considerable bearing on wilderness proposals, at least in the eyes of the general public, and should be more thoroughly addressed. For example, the construction of a transportation corridor to link the Ambler mining district to the coast should have been addressed in the final EIS.

Page 59. There is an apparent need for coordination between affected federal land managing agencies regarding future access to the Ambler Mining District. While the Fish and Wildlife Service indicates (on page 80 of the Kanuti NWR Comprehensive Conservation Plan) that access to Ambler from the Red Dog port facility is currently favored over access from the Dalton Highway, the National Park Service is recommending Wilderness designation for land in the Krusenstern, Noatak, and Kobuk units, through which a route to Red Dog would have to cross. 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  
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

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UNITED STATES OF AMERICA  
DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE

PUBLIC HEARING ON  
DRAFT ENVIRONMENTAL IMPACT STATEMENTS  
FOR  
WILDERNESS DESIGNATIONS  
AND  
SUBSISTENCE, SECTION 810, ANALYSES  
FOR

ANIACHAK NATIONAL MONUMENT AND PRESERVE  
CAPE KRUSENSTERN NATIONAL MONUMENT  
DENALI NATIONAL PARK AND PRESERVE  
GLACIER BAY NATIONAL PARK AND PRESERVE  
KATMAI NATIONAL PARK AND PRESERVE  
KOBUK VALLEY NATIONAL PARK  
NOATAK NATIONAL PRESERVE

National Park Service  
2525 Gambell Street, Suite 300  
Anchorage, Alaska  
July 18, 1988  
7:00 o'clock P.M.

Hearing Officer:

MR. JACK ALLEN  
Regional Solicitor  
Department of Interior

1 not be able to -- what's the word? -- lease or allow a specific  
2 land assignment of federal land to a concessionaire for visitor  
3 facilities, where we could in the areas that are not wilderness,  
4 because it would be a -- if it was -- involved a permanent  
5 facility, we could not do that in existing wilderness.

6 MS. MCGUIRE: And what about subsistence hunting?

7 MR. MOSBY: It would still continue. It's a  
8 right, the opportunity is there by law.

9 MR. BEAL: Yeah, where subsistence hunting is  
10 allowed now ....

11 MR. MOSBY: Where it is allowed.

12 MR. BEAL: ..... it would continue, and the same  
13 thing with sport hunting. Where sport hunting is allowed now  
14 in national preserve units, that would also be allowed if those  
15 lands were designated wilderness.

16 MS. MCGUIRE: That was my question about the float  
17 plane or access. If there is access now, becoming a wilderness  
18 area does not -- I've read what you've said, but I just wanted to  
19 hear it I guess.

20 MR. BEAL: The special access provisions of  
21 ANILCA .....

22 MS. MCGUIRE: Are allowed in .....

23 MR. BEAL: ..... for park lands that allow for the  
24 use of snow machines, motor boats and airplanes are also applied  
25 -- also applied to wilderness lands.

1 MR. BANE: I might just -- if I might complicate  
2 the -- that answer a little bit. You're in- -- particularly  
3 interested in Katmai?

4 MS. MCGUIRE: Um-hm. 

5 MR. BANE: What he said was true, except that in  
6 the old monument boundaries snow machines -- I think it's  
7 appropriate -- or ATVs, things of that type are -- snow machines  
8 in particular, I don't think are permitted in the old park unit,  
9 are they?

10 MR. BEAL: I don't know. I'll have to look into  
11 that more.

12 MR. BANE: Yeah. ATVs are certainly not -- are  
13 not allowed.

14 MR. MOSBY: ATVs for sure -- yeah, they're not ....

15 UNIDENTIFIED: For any of the park units?

16 MR. BEAL: Correct. ATVs are not allowed in any  
17 of the park units.

18 MR. BANE: But subsistence is not -- there is no  
19 subsistence in Katmai National Park. There is in the preserve,  
20 but not in the park.

21 UNIDENTIFIED: What's the bias against helicopters?

22 MR. ALLEN: For what purposes?

23 UNIDENTIFIED: Well, they're not allowed at all in  
24 any of the preserves or parks. Unless it's something -- a special  
25 permit by the National Park Service.



## DISTRIBUTION LIST

August 29, 1988

- [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, Land Use Advisors Committee, Fairbanks
- [120] The Honorable Judy Brady, Department of Natural Resources, Juneau
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- [1270] Mr. Larry Kimball, Alaska Federation of Natives, 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
- [947] Mr. Roger Mercer, National Oceanic and Atmospheric Administration, Anchorage
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- [1409] Mr. John Rense, Land Use Advisors Committee, Anchorage
- [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, Land Use Advisors Committee, 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
- [1560] Commander Douglas Smith, U.S. Coast Guard, Juneau
- [1285] Mr. Walter Stieglitz, U.S. Fish & Wildlife Service, Anchorage
- [1496] Mr. Reed Stoops, Land Use Advisors Committee, Juneau
- [1A21] 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

# KOBUK VALLEY

— = existing wilderness boundary  
●● = proposed boundary modifications

Park boundary

Park and Wilderness boundary

Park and Wilderness boundary

Park boundary

