

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 the Noatak National Preserve. 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 federal 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 NOATAK WILDERNESS RECOMMENDATION

The state opposes designation of 757,175 acres or 100% of the non-Wilderness lands in the Noatak National Preserve as Wilderness.

Rationale:

- 1) Of the 6.5 million acres comprising Noatak National Preserve, approximately 5.8 million acres, or 89% of the preserve, were designated as Wilderness by ANILCA in 1980. Thus, significant acreage within the preserve is already being managed to maintain its natural undeveloped character and to provide for solitude and primitive recreation experiences. The EIS does not clearly describe why additional wilderness lands are needed.
- 2) The Alaska Department of Transportation and Public Facilities in its 1981 Western and Arctic Transportation Study identified three corridors that could potentially cross and/or affect Noatak National Preserve. The three are a road, railroad, and/or slurry pipeline that would connect the Ambler Mining District with the coast near Cape Krusenstern. The state cannot support Wilderness designation for the southwest preserve since Wilderness would likely make development of an access route more difficult. (Applications for transportation and utility systems in and across Wilderness area require congressional review and approval, per Title XI.)
- 3) Approximately 290,000 acres of land within the area being proposed for Wilderness designation have been selected by native regional and village corporations under the Alaska

- Native Claims Settlement Act (ANCSA) of 1971. In addition, 1,825 acres in the southwest portion of the preserve have been conveyed to native corporations and individuals, and there are 13 native allotments within the proposed Wilderness. Given the potential for a large amount of private land within the study area and the potential for conflicting land uses, the state believes it would be appropriate to avoid Wilderness designation in the southwest preserve.
- 4) At least one possible RS 2477 right-of-way falls within a portion of the proposed Wilderness area. The Noatak Coastal Winter Trail #22 runs two miles north of the village of Noatak, downstream along the Noatak River. The state does not support inclusion of possible RS 2477 rights-of-way in Wilderness.
 - 5) Consistent with our concern regarding 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. Representatives of the NANA Regional Corporation, the North Slope Borough, and the Northwest Arctic Borough have submitted comments and/or testified in opposition to additional Wilderness.
 - 6) Since 89% of the preserve is already in Wilderness status, the state believes it would be prudent to leave some preserve areas as non-Wilderness to provide for the establishment of administrative or interpretative facilities, if deemed desirable and appropriate in the future.
 - 7) The state is concerned that, over time, NPS may manage traditional subsistence, commercial and recreational uses in Wilderness areas more stringently than is currently envisioned by the NPS or described in the EIS. For instance, the NPS may be pressured to impose restrictions in Wilderness on local activities, such as use of mechanized access. The state therefore does not support designation of additional Wilderness in the Noatak Preserve.

Recommendation:

Modify the boundary of the existing wilderness on the Township 27/28 North township line to meet the north bank of the Eli River. (See attached map.)

Rationale:

This adjustment would create a more identifiable field boundary, consistent with Congressional intent as stated in Section 103(b) of ANILCA.

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 recommendation 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. [#5(See Lake Clark EIS, page 47, paragraph 1.)] 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 lesser 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 ANILCA Section 810 evaluation contained in the EIS are lacking in the specificity needed to facilitate an assessment of the potential effects of the proposed actions on subsistence uses. (See page-specific comments.) Our major concerns regarding the 810 evaluations 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 EISs 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.

- 12) Without adequate justification, this and other 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.

- 13) 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 airplanes 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 should not result in controls being applied to "activities such as vehicle use" and "open and closed areas of use."

- 14) 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 9, final paragraph. The following sentence furthers the erroneous belief that rural Alaska is uninhabited and not used by man: "The majority of the study area is untouched by man." Interestingly, this statement contradicts the more accurate description of northwest Alaska presented on page 24: "Northwest Alaska is not the trackless expanse of snow and ice that people often perceive it to be. Humans have continuously explored and lived and used its resources for more than 12,500 years."

Page 22. Comprehensive and current information on brown bears is now available. A brown bear population census was conducted in the Noatak River area in 1987 jointly by the NPS, DFG, and FWS. The census results indicate a bear density of one (1) bear per 19.4 square miles. Further information can be found in "Demography of Noatak Grizzly Bears in Relation to Human Exploitation and Mining Development" by Ballard et al., 1988.

Page 22, sixth paragraph. Coyotes are uncommon in this part of Alaska.

Page 29, fourth paragraph. A recent study by the Northwest Arctic Borough (1988) found an unemployment rate of 63 percent in the borough, as compared to a rate of 13.8 percent reported by the Alaska Department of Labor.

Page 30, Table 4. We request that the NPS be more specific about references used to develop the figures in this table. One source which was not used, according to the bibliography, is Ernest S. Burch, Jr., 1985. Subsistence Production in Kivalina, Alaska: A Twenty-Year Perspective. DF&G Division of Subsistence Technical Paper No. 138, Juneau. Kotzebue subsistence harvest data for 1986 also are available from our Kotzebue office and will appear in a technical report currently in preparation. The Kotzebue study found that in 1986, Kotzebue residents harvested more than 238,000 fish, which far exceeds the regional estimate in the draft EIS. Additionally, 1,916 caribou were reported harvested by Kotzebue residents. Marine mammals, an important food source for northwest Alaska residents, are missing entirely from Table 4, which is an important oversight that must be corrected.

Page 33, Table 5. The percentages in this table are incorrect. Please refer to our comments on the Cape Krusenstern draft EIS for additional information. Fish constitute a higher percentage of the subsistence resources harvested. No estimates for marine mammals are provided. Changes also should be made where this table is repeated in the draft EIS.

Page 38. The only environmental impact difference between alternatives is expected to be an increase in airplane use by 280 flights by the year 2020. Airplane access is provided for by Title XI of ANILCA and can only be restricted through regulation after findings of resource damage and holding public hearings. These are identical processes whether wilderness or not.

Page 39. Because there are no discernible differences between the alternatives, it is difficult to understand why the 11 percent of the unit which is not preserve would deteriorate to "semi-wilderness" or "non-wilderness in character."

Page 40, first paragraph, and page 42, next to last paragraph. Boats also are used to access caribou hunting areas in the fall months.

Page 42, final paragraph. We request clarification regarding how the NPS is defining "key species" used for subsistence purposes. Other species are seasonally important to the local diet and should not be overlooked.

Page 44, Issues Raised in Scoping. As previously noted, we are concerned that most of the issues raised in public scoping meetings are not addressed in this EIS. For example, we believe that permit requirements and access to inholdings are particularly relevant topics and should be given attention. The NPS should explain more fully why such issues are not addressed in this EIS.

Page 46. The last paragraph describes a smaller wilderness proposal which was dropped from the EIS. The reason for dropping it was "it would not provide protection to major wildlife species habitat." We again question, what protection does wilderness provide that is not already provided by preserve status?

Pages 50-55, ANILCA 810 Evaluation. Changes recommended for the text of this EIS should also be made in this section as required for consistency.

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







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- [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
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- [1298] Dr. John Choon Kim, Land Use Advisors Committee, Anchorage
- [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
- [1269] Mr. Mike Mitchell, Alaska State Library, Juneau
- [1561] LCDR Ronald L. Nelson, United States Coast Guard, Anchorage
- [1508] Rear Admiral Edward Nelson, Jr., U.S. Coast Guard District 17, Juneau

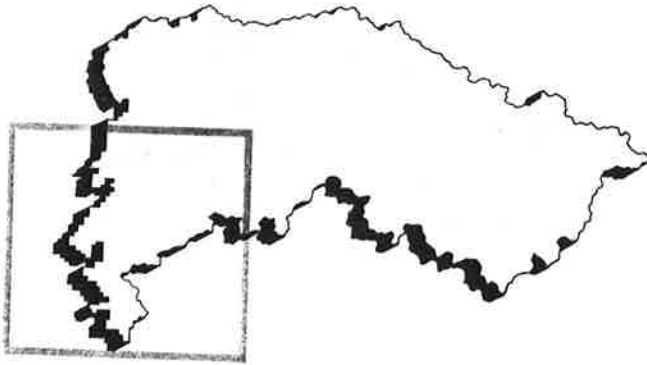
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- [501] The Honorable Jim Sampson, Commissioner Department of Labor, Juneau
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- [1496] Mr. Reed Stoops, Land Use Advisors Committee, Juneau
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- [22] 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

NOATAK NATIONAL PRESERVE

-  Not Suitable for Wilderness
-  Existing Wilderness
-  Preserve Boundary
-  Land Selections, Native and State—includes subsurface and surface estates
-  Native and State-**Owned** Lands—includes subsurface and **surface** estates
-  Small Tract Entries—includes native allotment, homesites, T&Ms, etc.



Note: Nonfederal lands within the study area would not be eligible for wilderness designation unless acquired by federal government.



STUDY AREA

NOATAK NATIONAL PRESERVE
U.S. Department of the Interior / National Park Service

189 20007A APX

