

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

STEVE COWPER, GOVERNOR

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September 28, 1988

Mr. Michael Penfold  
State Director  
Bureau of Land Management  
701 'C' Street, Box 13  
Anchorage, AK 99513

Dear Mr. Penfold:

The State of Alaska has completed its review of the Alaska National Interest Lands Conservation Act (ANILCA) Section 1001 Draft Report and offers the following comments for your consideration:

### I. State Selections

The state urges the Bureau of Land Management (BLM) to differentiate, throughout the report, between federal land that is selected by the state or Native corporations and federal land which is unencumbered with such selections. The draft report refers to 3.6 million acres of federal land, but almost 2 million acres of this land has been selected by other parties. Pursuant to Section 906(k)(1)(B) of ANILCA, the BLM should take no actions regarding land selected by the state without state concurrence. Specifically, the plan should not propose federal oil and gas leasing on any land that is encumbered by state selections. To fulfill the objective of making oil and gas resources in this area available, BLM should convey the selected lands to the state so that the state can offer leases for oil and gas exploration and development.

### II. Completion of the Central Arctic Management Area Resource Management Plan

The state requests that the BLM include a written commitment in the draft report to complete the Resource Management Plan for the Central Arctic Management Area. The state believes this is an important planning effort which will provide a context for the wilderness and oil and gas leasing provisions contained in the 1001 report.

### III. Minimum Altitude Requirements for Aircraft

The state urges the BLM to reconsider its recommendation that aircraft be required to maintain a minimum altitude of 1000 feet above ground level, except for takeoffs and landings (recommendation number 5 on page v). The state questions BLM's authority to regulate airspace, especially on such a broad scale. In addition, weather conditions on the North Slope do not always allow aircraft operation at such an altitude. Often low ceilings make operation under 1000 feet necessary. No rule which creates hazardous conditions should be implemented.

#### Specific Comments

List of Abbreviations. "ADGGS" is Alaska Division of Geological and Geophysical Surveys within the Department of Natural Resources. "BBL" is the customary abbreviation for a barrel of oil, not a billion barrels of oil as defined in this abbreviation. If readers do not refer to the abbreviations list before reading the report, they could be misled by the oil and gas resource estimates expressed as BBLs.

Map 1.2 shows the Utility Corridor and the east-west ANILCA Section 143(j) corridor as "unencumbered BLM land". As indicated in Alaska's land conveyance priority list, the state urges BLM to convey this selected, or encumbered, land to the state.

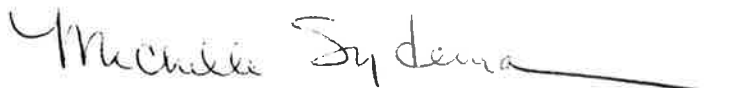
Page ii and 4.1. As previously noted, BLM can only open the approximately 2 million acres of federal land that is not selected by the state or Native corporations to oil and gas leasing and development.

Page 5.2. The state notes that it was not given an opportunity to review the revised 1001 report during the "Phase Two Review" in January and February of 1988.

The state appreciates the opportunity to comment on this draft report. We urge the BLM to revise the draft to accommodate the state's concerns.

Sincerely,

Robert L. Grogan  
Director



By: Michelle Sydeman  
Project Analyst

Mr. Michael Penfold

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