

STATE OF ALASKA

OFFICE OF THE GOVERNOR

DIVISION OF GOVERNMENTAL COORDINATION

STEVE COWPER, GOVERNOR

STATE CSU COORDINATOR
2600 DENALI STREET, SUITE 700
ANCHORAGE, ALASKA 99503-2798
PHONE: (907) 274-3528

November 16, 1987

Mr. Walter 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 U.S. Fish and Wildlife Service (FWS) Draft Policy for Cabin Management on National Wildlife Refuges in Alaska and offers the following comments for your consideration. This letter is submitted on behalf of state agencies and represents a consolidation of agency views.

Before offering specific comments, the state would like to express its appreciation for the approach FWS is taking to development of new cabin regulations. We believe that public review of this draft policy will facilitate greater agreement between the general public, affected user groups, and state and federal agencies on appropriate cabin management policies. We commend the FWS for this effort and look forward to working with the FWS on solutions to the various management issues related to cabin use in Alaska.

SUMMARY OF CONCERNS

The state finds that sections of the draft policy conflict with (1) provisions of the Alaska National Interest Lands Conservation Act (ANILCA), (2) congressional intent as recorded in ANILCA's legislative history, and (3) recommendations adopted in November 1984 by the Alaska Land Use Council (ALUC), including the FWS, regarding use and occupancy of cabins on public lands in Alaska. (See attached.) Specifically, the state objects to:

- proposed restrictions of construction of commercial and subsistence cabins in Wilderness areas and Wild and Scenic River corridors;
- the definition of "immediate family member" as it applies to permit renewal;
- the definition of "non-use" as it applies to permit revocation;

- the requirement that users with permits for year-round use must occupy the cabin "for a substantial portion of the year" and use it as their "primary place of residence";
- procedures related to permit revocation which are more restrictive than provided for in ANILCA;
- restrictions on use of cabins by guests;
- the requirement that applicants for new cabins must be participating in an activity which has "historically been supported by the construction and use of cabins in the geographic area"; and,
- the requirement that individuals must have pursued traditional activities for a minimum of 3 years in order to be eligible for a cabin permit under Section 1303(b)(1).

In sum, the state does not believe FWS has adequately complied with congressional intent, as stated below, to protect the traditional Alaskan way-of-life:

"The Committee intends that the Secretary utilize this permitting system to permit continuation of this lifestyle wherever possible and where there is no real conflict or danger to the resources for which the units have been established." (Senate Report 96-413, November 14, 1979.) (Emphasis added.)

The state therefore requests numerous revisions to the draft policy, as specified below.

SPECIFIC COMMENTS

II. SCOPE:

The state requests that the FWS clarify that this policy does not apply to Alaska Native Claims Settlement Act Section 22(g) lands.

III. AUTHORITY:

B. paragraph 2. The state recommends adding Section 1306 to the list of sections within ANILCA which address use of cabins. Section 1306 provides for the construction and use of administrative and visitor facilities.

IV. DEFINITIONS:

2. Immediate Family Member. The state requests revision of the proposed definition to conform with the definition of family member contained in Section 803(1) of the ANILCA and 50 CFR 36.2(m)(1). This definition includes "all persons related by blood, marriage, or adoption, or any person living with the household on a permanent basis." This definition is more appropriate to the extended family structure which exists in rural Alaska, as stated in the following legislative history:

"The definition of "family" recognizes extended family patterns common in the subsistence culture of Alaska. It also includes within its coverage any person living in a household on a permanent basis, as well as all local rural residents living outside the household who are related by blood, marriage, or adoption (legal or equitable)." (Congressional Record-Senate, July 23, 1980, Page 9592.) (Emphasis added.)

The proposed definition also states that in order to qualify as an immediate family member, a person must have resided in the cabin at the time the original permit was issued. This restriction fails to provide for legitimate absences associated with education, health, seasonal employment, or military service, or other circumstance (including choice). The state does not believe it is reasonable to require that an immediate family member reside with the claimant at any particular point in time to be eligible for permit renewal.

The policy also must provide for the inclusion of additional family members who may become members of the household after the issuance of the original permit. ALUC recommendation #3 deals with the definition of "immediate family member" for the purpose

of renewing permits under Section 1303 of ANILCA. This recommendation states:

"In renewing permits under Section 1303 of ANILCA for life of claimant and immediate family, federal agencies in Alaska are encouraged to adopt by regulation a definition of eligible immediate family members as follows: 'last immediate family member of the claimant residing in the cabin or structure under permit' means any person related by blood, marriage, or adoption and whose eligibility as an immediate family member is so declared by the claimant as a part of the initial permit application or as a part of the claimant's subsequent renewal applications." (Emphasis added.)

In addition, the state objects to FWS' position in the draft policy that a common law relationship will not be recognized for the purpose of renewing a cabin permit. Common law relationships frequently involve joint ownership of assets, including real properties. For example, both parties in a common law relationship may be able to provide the necessary proof of ownership or possessory interest in a cabin to qualify for a permit. While a permit may only be issued to a single person, the other common law partner should not be denied the right to have the permit re-issued in his/her name should the original permittee die or move from the cabin.

Finally, the state notes that the proposed FWS definition is even more restrictive than the definition contained in the final National Park Service (NPS) cabin regulations. The NPS definition recognizes grandparents, parents, brothers, sisters, children or adopted children of the claimant or spouse.

9. Non-use. The state has questions and serious reservations about this definition and implementation procedures related to it [e.g., (B)(4)], including the following:

- (1) Under what circumstances can the FWS assume ownership of a privately-owned cabin (i.e., an existing cabin for which a permittee has reasonably demonstrated a possessory interest or right of occupancy)? Can the FWS legally assume ownership of a cabin if the permittee does not use it for a year without notifying the refuge manager, as indicated on page 11, top paragraph, of the draft policy? This provision does not appear to be consistent with Section 1303(c) of ANILCA, which directs the FWS to renew permits unless use of a cabin "is causing or may cause significant detriment to the principal purposes for which the unit was established."
- (2) The requirement that permittees notify the refuge manager if they will not be using their cabin during a particular year is unnecessarily burdensome, given the rural Alaskan

lifestyle. There are many legitimate circumstances which could result in non-use of a cabin (e.g., medical problems or closure of hunting, trapping, or fishing seasons). In addition, not all refuges have staff residing in or near communities where permittees live. As a result, permittees must make expensive telephone calls or write the refuge manager to report non-use. This requirement does not appear to be warranted, given that non-use will not result in detriment to refuge resources. Furthermore, it is not reasonable to revoke a permit based on a permittee's failure to notify the refuge manager of non-use after one year, especially if the permittee owns the cabin.

- (3) If the FWS believes a cabin has been abandoned, the state suggests that the refuge manager attempt to contact the permittee to verify this. If the permittee no longer wishes to use the cabin, he/she may voluntarily relinquish the cabin permit.
- (4) Under what circumstances, if any, would the FWS revoke and/or refuse to renew a permit based on non-use, if notification has been provided? The state requests that this be addressed in the final policy.
- (5) Revocation and/or non-renewal of permits for reasons of non-use is not consistent with the 1984 FWS-endorsed ALUC cabin recommendations. These recommendations state that granting and renewal of permits should not be based on criteria other than those explicitly identified in Section 1303 of ANILCA.

The state recognizes that cabins, especially "new" cabins, facilitate the continuation of on-going activities, as indicated in Section 1303 of ANILCA. However, the proposed definition and related implementation procedures appear to more severely restrict cabin use than was intended by Congress or is necessary to protect refuge resources.

11. Public Use Cabin. The state recommends that this definition be expanded to recognize that public use cabins can be used by hunting and fishing guides, trappers, and subsistence users, as well as the general public. Alternatively, the state suggests deletion of the phrase "for recreational purposes."

In addition, there may be circumstances where a cabin which is (a) not "owned" by the FWS or (b) under permit seasonally could be available part of the year for public use. The state suggests that the policy provide for public use of privately-owned cabins or seasonally permitted cabins, where the owner or permittee is amenable to such an arrangement.

13. Year-Round Use or Occupancy. The state notes that "traditional and customary uses of existing cabins and related structures" (ANILCA, Section 1303) should not be limited to year-round use or occupancy. We do not believe this is FWS' intention, but suggest that the final policy make this explicit.

In addition, the state would strongly object to any requirement that individuals who have "traditionally" resided within a unit (including traditional intermittent residency) must use their cabin as their "residence for a substantial portion of the year" and as a "primary place of residence" or lose their permit. The state does not believe Congress intended to restrict traditional and customary cabin users to a particular regimen, or to disallow annual fluctuations in use. Furthermore, as previously noted, there are many legitimate reasons (e.g., medical, education, military service, etc.. . .) why a user would need to change his/her pattern of use.

The state requests further clarification of this definition and related implementation procedures [e.g., (A) (6) on page 6 of the draft policy]. Specifically, we request that the state's concerns be addressed, and the terms "substantive portion of the year" and "primary place of residence" be clearly defined in the final policy. We additionally refer the FWS to ALUC recommendation #2A, which states that permittees should not be required to prove their actual occupancy of a cabin during specific periods or for a minimum length of time.

V. POLICY:

A. Existing Cabins. The state requests that the FWS describe the various factors that it will consider in making compatibility determinations.

B. New Cabins. The state recommends expanding this policy to address Sections 1303, 1306, 1310, 1315, and 1316 of ANILCA. As currently written, this policy prohibits new administrative and public use cabins. In addition, we request that the FWS specify the types of activities for which cabin use may be necessary (e.g., subsistence hunting or fishing, guiding, trapping, etc.).

VI. OBJECTIVES:

A, B, C, and D. The state suggests that the FWS review these objectives to ensure that the various types of cabin use addressed in ANILCA are referenced. (See citations listed above.)

D. The state questions the accuracy of the statement "new cabins for commercial activities are prohibited in wilderness." Although ANILCA does not explicitly address this topic, ANILCA's legislative history contains numerous references to congressional

intent in this regard. For example, Senate Report 96-413, dated 11/14/79, contains the following language:

"It is recognized that some uses which are allowed within wilderness areas designated by the bill, most notably guiding and trapping, may in some areas require the use of rudimentary line cabins, shelters, caches, and other minimal facilities. Without recognition of these incidental uses and facilities, guiding, trapping, and other allowed uses, while technically allowed, would be impossible to conduct as a practical matter. Therefore the Committee intends that those related uses and facilities required to accomplish uses otherwise allowed within wilderness areas shall also be allowed, consistent with the allowed use and the purposes of the areas designated as Wilderness."

In addition, Sections 304(d), 1303(b)(1), 1306, 1310, and 1316(a) of ANILCA modify the Wilderness Act in Alaska and allow various types of cabin use (including construction of new commercial cabins) in Wilderness. Wilderness areas (and Wild and Scenic River corridors) are considered "public lands" and "conservation system units" as indicated in Sections 102(3) and (4) of ANILCA. The state therefore urges the FWS to allow the construction and use of cabins in Wilderness where necessary to support commercial activities which are allowed by ANILCA and compatible with refuge purposes.

In addition, the state requests reconsideration of the policy that new cabins within Wild and Scenic River corridors will be subject to the same criteria as cabins in Wilderness areas. Wild and Scenic River corridors are not subject to the same statutory restrictions as designated wilderness, particularly with respect to commercial activities.

The state also notes that trapping is allowed throughout all refuges in Alaska. Therefore, we recommend that the phrase "where trapping is a customary and traditional use" be deleted.

GUIDELINES:

Page 5, paragraph 3. The state supports the guideline that a cabin permit may be based on more than one activity (e.g., subsistence and guiding). Issuance of multiple use permits is consistent with congressional intent and will help to accommodate the rural Alaskan way-of-life.

Page 5, paragraph 4. This section states that cabins and related structures must be within the size limits set forth on page 12. However, the discussion on page 12 indicates that "In general, cabins will be 200 square feet or less." (Emphasis added.) We suggest that the size guidelines remain flexible and be based on

what is reasonably necessary to accommodate the permittee's activity.

VIII. IMPLEMENTATION PROCEDURES:

A.4. Guests. The provision that the permittee must be in the proximity of the cabin during use by guests or provide guests with a written explanation regarding the permittee's absence does not appear to be justified. Guests often assist permittees in carrying out the activity(s) for which the cabin is needed (e.g., commercial fishing, guiding, subsistence, etc. . .). In addition, there are numerous legitimate circumstances which could result in guests being present in the permittee's absence (e.g., to feed a dog team). The state requests deletion of these requirements.

In addition, the state requests that additional information be provided in the final policy on the special conditions which may be placed on permits to limit the activities of guests and the circumstances which may warrant such action.

A.5. Use Patterns. The state notes that Congress recognized that traditional activities are subject to change over time and intended that these changes be recognized by managing agencies. This policy should allow for the evolution of traditional patterns of use, subject to compatibility with refuge purposes.

A.6. Year-Round Residency. The state requests that this policy recognize that rural Alaskans often use the same cabin in the spring and summer for fishing, fall for hunting, and winter for trapping. This can result in year-round use of cabins.

A.8. Non-compliance. The state requests revision of this policy to conform with ANILCA Section 1303(c)(2). This section indicates that "the Secretary, after notice and hearing, may revoke a permit . . . if he determines, on the basis of substantial evidence in the administrative record as a whole, that the use under permit is causing or may cause significant detriment to the principal purposes for which the unit was established." (Emphasis added.)

A.9. 22(g). As previously indicated, the state requests clarification that these policies do not apply to lands that are subject to Alaska Native Claims Settlement Act Section 22(g).

A.12. Additions to the Refuge. The state recommends that any cabins located on lands that become part of a refuge after December 2, 1980 should be dealt with under the provisions of Section 1303(d). The final policy should clearly state that continued use of any cabins in this category will be permitted

unless the continued use of the cabin would constitute a direct threat to or a significant impairment of refuge purposes.

A.13. Periods of Use. The state recommends that the final policy direct refuge managers to be flexible in specifying activities and periods of use in cabin permits. Activities and periods of use can change based on the availability of resources, harvest closures, evolving use patterns, etc.

A.15.g. The final cabin policy should provide additional guidance on what constitutes remodeling versus repairs. Any work on a cabin that does not result in a change to the general outward appearance of the structure should not require written permission from the refuge manager.

A.16. Existing regulations at 50 CFR Section 36.15(b) allow for the use of dead or downed timber for firewood without a permit. Existing regulations at 50 CFR Section 36.15(a) require a permit for cutting live timber over a certain size, with no permit required if the timber is under that size. It should not be necessary to attach special conditions to the cabin permit in order to authorize the use of timber.

A.17. The statement that the "appeals procedure will be provided by the refuge manager upon request at the time of denial" is not satisfactory. Applicants should be informed by the refuge manager of all of their appeal rights at the time of denial and the procedures should be provided automatically. The applicant should not have to request this information.

B.2.f. This section requires permittees to vacate cabins within one year of receipt of a non-renewal or revocation notice. The state recommends that provision be made for permittees who appeal the notice, ensuring that they are not required to vacate a site before a final decision is made.

B.2.h. The state requests deletion of this policy. ANILCA does not require that a claimant use a cabin for "a substantial portion of the time since acquiring possession or right of occupancy."

In addition, this policy is in direct contradiction to ALUC recommendation 2(A) which states: "Proof of actual occupancy during specific periods or for a minimum length of time should not be required."

B.2.i. See earlier comments regarding the definition of immediate family member. In addition, the state notes that not all "traditional and customary" cabin use includes residency. We therefore suggest substitution of the phrase "residing with the

claimant within the cabin for which the application is being submitted" with "of the claimant."

B.3. See earlier comments regarding remodeling and repair.

B.4. See earlier comments on the definition of non-use.

B.5. The state requests that the FWS indicate the criteria that a new owner must meet in order to use an existing cabin. We further suggest that all permits reference this criteria to decrease the incidence of unusable permits being sold.

B.6. Are trapping partners considered guests for the purposes of Implementation Procedure A.4. on page 5?

C. Applicable to New Cabins. The state requests that this section address use of new cabins by multiple permittee, the public and/or government. For example, new cabins authorized for a seasonal use, such as trapping, may be available for public and/or government use during the summer.

C.2. The state notes that ANILCA does not require subsistence activities to be traditional by individual, but rather by community. The requirement that an applicant must "have participated in the activity for a minimum of three years in the geographic area in order to establish his customary and traditional use" is inconsistent with the state's subsistence law, which has no minimum residency or participation requirement, and with congressional intent, as stated below:

"The Committee recommends that traditional uses be allowed to continue in those areas where such activities are allowed. This is not a wilderness type pre-existing use test. Rather, if uses were generally occurring in the area prior to its designation, those uses shall be allowed to continue and no proof of pre-existing use will be required."

(SR 96-413, 11/14/79)

In addition, the state requests that the FWS expand the first sentence of the second paragraph to explicitly include trapping and commercial cabins, and define "legitimate subsistence activity," "local resident," and "geographic area."

C.3. See earlier comments regarding cabins in Wilderness areas and Wild and Scenic River corridors. Also, the state requests that the FWS evaluate this policy in light of the ALUC Guidelines for Management of Wild and Scenic Rivers in Alaska (attached).

C.4. The state requests that this policy be clarified to indicate that existing cabins reconstructed by the permittee after loss due to fire, vandalism, etc . . . are the property of the permittee. In addition, we request clarification regarding whether cabins which have been destroyed can be reconstructed in new locations, if necessary.

C.6.b. As previously indicated, the state recommends that FWS maintain flexibility in specifying cabin size, so that cabin uses are adequately accommodated.

C.6.c. The location of new cabins should consider "adequate and feasible access," in addition to the other factors named here. Furthermore, the state requests that the FWS consult with the Alaska Department of Fish and Game regarding the location of new cabins to minimize conflicts with fisheries, wildlife, and habitat values.

D.3. See earlier comments regarding criteria as they apply to new owners.

D.5. ANILCA Section 304(d) does not limit the exercise of valid commercial fishing rights, including use of cabins, to "non-wilderness lands," as indicated here. The state requests revision of this policy.

ADDITIONAL COMMENTS

Access. The state requests that the final policy address access for cabin users. Section 1110(b) of ANILCA guarantees access to inholdings. The most commonly accepted definition of "inholding" involves the private or non-federal ownership of land within a conservation system unit. Section 1110(b), however, recognizes a "valid occupancy" as another type of inholding which has a guaranteed right of access.

Temporary Facilities. The state requests that the final policy address the continuance of existing uses and future establishment and use of temporary campsites, tent platforms, shelters, and other temporary facilities directly and necessarily related to the taking of fish and wildlife. Section 1316 of ANILCA authorizes such use on all refuge lands, including Wilderness areas and Wild and Scenic River corridors. In addition, the state requests that FWS define "significant expansion" as it relates to Section 1316(b) and 304(d) of ANILCA.

810 Evaluation. The state requests that the FWS prepare a draft 810 evaluation for public review, prior to finalization of the cabin policy. Such an evaluation will be helpful in determining the effects of this policy on subsistence use. Attached is a

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copy of the ALUC Guidelines for Compliance with ANILCA Section 810.

Citations. The state requests that the FWS review this policy to ensure that policies are appropriately cited. Several sections of the policy [e.g., VIII.C.2 and VIII.C.2 and 3] attribute proposed administrative decisions to ANILCA.

Reporting Requirements. The state notes that several of the reporting requirements for permittees do not seem to reflect congressional intent to protect rural residents from unnecessary regulatory burden. For example, Section VIII.A.14 (page 7) requires permittees to inform FWS "in a timely manner" of any changes in the individuals who will be using the cabin regularly. In addition, Section VIII.A.4 (page 6) states that "In the case of short term absences of the permittee for reasonable cause, the guest will be furnished with a document by the permittee explaining the absence and expected time of return." These requirements are not consistent with Congress' intent that:

". . . rural communities and cultures will not be burdened by implementation of a complex, and in many instances, culturally disruptive regulatory system . . ." (SR 96-413, November 14, 1979)

We request review of these policies to ensure that the above stated intent is met.

"Traditional and Customary" vs. "Private Recreational." The state requests that the FWS clearly define the terms "traditional and customary uses of existing cabins" and "private recreation use" prior to finalization of the cabin policy. We suggest that the FWS provide parties which have commented on this draft policy and other interested individuals and agencies with the opportunity to review and comment on these definitions. This process is recommended because there may be considerable overlap between these terms, resulting in important management implications.

Because of the complexities involved in cabin management and the importance of cabins in the traditional Alaska way-of-life, the state urges the FWS to distribute a written response to comments it receives on this draft, prior to finalization of the policy. We believe this will help facilitate greater understanding and agreement between interested parties on appropriate management policies.

On behalf of the State of Alaska, thank you for the opportunity

Mr. Walter Stieglitz
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to review this draft policy. If we can be of any assistance in clarifying these comments, feel free to contact this office.

Sincerely,

Robert L. Grogan
Director



by Michelle Sydeman
CSU Coordinator

cc: Commissioner Brady, Department of Natural Resources
Commissioner Collinsworth, Department of Fish and Game
Commissioner Hickey, Department of Transportation and Public
Facilities
Commissioner Kelso, Department of Environmental Conservation
Ms. Dorothy Jones, Citizens Advisory Commission on Federal
Areas
Mr. John Katz, Office of the Governor, Washington, D.C.
Mr. Rod Swope, Office of the Governor, Juneau

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Title: FWS Draft Cabin Management Policy

h[1272] Mr. Mike Abbott, Resource Development Council, Anchorage
 hh[1075] The Honorable Albert P. Adams, Kotzebue
 hh[1304] Ms. Susan Alexander, The Wilderness Society, Anchorage
 hh[1266] Ms. Gail Baker, U.S. Fish & Wildlife Service, Anchorage
 hh[1317] Dr. Robert Baker, Anchorage
 hh[1312] Mr. James Barkeley, Esq., Land Use Advisors Committee, Anchorage
 hh[1252] Mr. Michael Barton, U.S. Forest Service, Juneau
 hh[1037] Ms. Joyce Beelman, Department of Environmental Conservation, Fairbanks
 hh[1335] The Honorable John Binkley, Bethel
 hh[120] The Honorable Judy Brady, Department of Natural Resources, Juneau
 hh[1372] Mr. Al Carson, Department of Fish and Game, Anchorage
 hh[1079] The Honorable Bette M. Cato, Valdez
 hh[1327] The Honorable John B. Coghill, Nenana
 hh[248] The Honorable Don Collinsworth, Department of Fish and Game, Juneau
 hh[942] Ms. Tina Cunning, Department of Fish and Game, Nome
 hh[1373] Mr. Donald D'Onofrio, National Ocean Service, Anchorage
 hh[1293] Mr. Bartz Englishoe, Land Use Advisors Committee, Anchorage
 hh[1286] Mr. Boyd Evison, National Park Service, Anchorage
 hh[499] Mr. Roy S. Ewan, Ahtna, Inc., Copper Center
 hh[1116] The Honorable Bettye Fahrenkamp, Fairbanks
 hh[1117] The Honorable Jan Faiks, Anchorage
 hh[1118] The Honorable Frank R. Ferguson, Kotzebue
 hh[975] Mr. Darryl L. Fish, Bureau of Land Management, Anchorage
 hh[203] Mr. Peter Freer, Department of Community and Regional Affairs, Juneau
 hh[1407] Mr. Harold Gillam, Land Use Advisors Committee, Fairbanks
 hh[1122] The Honorable Rick Halford, Chugiak
 hh[1419] Mr. Terry Haynes, Department of Fish and Game Subsistence Division, Fairbanks
 hh[1091] The Honorable Adelheid Herrmann, Naknek
 hh[1268] The Honorable Mark Hickey, Dept. of Transportation & Public Facilities,
 Juneau
 hh[1384] The Honorable Lyman Hoffman, Bethel
 hh[1406] Reverend J. Michael Hornick, Land Use Advisors Committee, Anchorage
 hh[1413] Mr. Clark Horton, Federal Aviation Administration AAL-4, Anchorage
 hh[1271] Ms. Sharon Jean, Land Use Advisors Committee, Soldotna
 hh[444] Mr. John Katz; Office of the Governor, Washington, D.C.
 hh[1288] The Honorable Dennis Kelso, Department of Environmental Conservation, Juneau
 hh[1298] Dr. John Choon Kim, Land Use Advisors Committee, Anchorage
 hh[1270] Mr. Larry Kimball, Alaska Federation of Natives, Anchorage
 hh[1377] Mr. Mark Kuwada, Department of Fish & Game, Anchorage
 hh[1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
 hh[937] Ms. Janie Leask, Alaska Federation of Natives, Anchorage
 hh[1258] Mr. Craig Lindh, Division of Governmental Coordination, Juneau
 hh[1] Mr. Mark Mayo, Department of Transportation and Public Facilities, Anchorage

LABELS

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Title: FWS Draft Cabin Management Policy

hh[945] Ms. Janet McCabe, National Park Service, Anchorage
hh[946] Mr. Ron McCoy, Alaska Land Use Council, Anchorage
hh[1400] Ms. Cynthia Meyer, Division of Governmental Coordination, Juneau
hh[1269] Mr. Mike Mitchell, Alaska State Library, Juneau
hh[1316] Mr. Barry Moorhead, Federal Highway Administration, Juneau
hh[947] Mr. Ron Morris, U.S. Department of Interior, Anchorage
hh[1408] Mr. Richard Ogar, ARCO Alaska, Inc., Anchorage
hh[469] Mr. Larry Ostrovsky, Department of Natural Resources, Juneau
hh[1287] Mr. Michael J. Penfold, Bureau of Land Management, Anchorage
hh[1277] Mr. Norman Piispanen, Dept. of Transportation & Public Facilities, Fairbanks
hh[1409] Mr. John Rense, NANA Development Corporation, Anchorage
hh[1273] Mr. Randy Rogers, Northern Alaska Environmental Center, Fairbanks
hh[1299] Mr. Wayne Ross, Land Use Advisors Committee, Anchorage
hh[501] The Honorable Jim Sampson, Commissioner Department of Labor, Juneau
hh[87] Dr. Lidia Selkregg, Land Use Advisors Committee, Anchorage
hh[1378] Mr. Thyas Shaub, Department of Commerce and Economic Development, Juneau
hh[948] Mr. Walt Sheridan, U. S. Forest Service, Juneau
hh[1275] Mr. Ron Silas, Tanana Chiefs Conference, Fairbanks
hh[1391] The Honorable Henry Springer, Alaska State Legislature, Nome
hh[1285] Mr. Walter Stieglitz, U.S. Fish & Wildlife Service, Anchorage
hh[60] Mr. Jim Stratton, Land Use Advisors Committee, Juneau
hh[1421] Ms. Lisa Sutherland, Senator Steven's Office, Washington
hh[22] Mr. Rod Swope, Office of the Governor, Juneau
hh[1242] Mr. Ike Waits, Department of Community & Regional Affairs, Anchorage
hh[1239] Mr. Rob Walkinshaw, Department of Natural Resources, Anchorage
hh[1371] The Honorable Kay Wallis, Fort Yukon
hh[940] Mr. Vernon R. Wiggins, Alaska Land Use Council, Anchorage
hh[1240] Mr. Dan Wilkerson, Department of Environmental Conservation, Anchorage
hh[994] Mr. Geoff Wistler, Department of Commerce and Economic Development, Juneau
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Senator Taylor, Wrangell
Senator Zharoff, Kodiak