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July 20, 1987

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

Dear Mr. Steiglitz:

The State of Alaska has reviewed the **Final Kodiak National Wildlife Refuge (NWR) Comprehensive Conservation Plan/Environmental Impact Statement/Wilderness Review (CCP)**. This letter is submitted on behalf of state agencies and represents a consolidation of agency concerns and comments.

The state commends the U.S. Fish and Wildlife Service (FWS) for the considerable effort it has devoted to resolving issues raised in the state's March 21, 1986, letter on the draft CCP. Many of the issues raised in the March 21 letter have been resolved. We do, however, have some remaining concerns which we hope can be addressed in the Kodiak Record of Decision (ROD). A discussion of these follows.

1. ACMP Consistency: The state concurs with the FWS determination that management alternatives presented in the CCP are consistent to the maximum extent practicable with provisions of the Alaska Coastal Management Program. However, we note that two of the issues raised in the state's March 21, 1986, letter, although not consistency-related, remain of significant concern to the state and Kodiak Island Borough. We urge the FWS to address these concerns in the ROD, as requested later in this letter. They are described under "Commercial Fishing Support Facilities" and "Fish Hatcheries."
2. Kodiak Wilderness Proposal: Although the state recognizes benefits associated with designating lands within the Kodiak NWR as wilderness, we have several concerns related to the Kodiak wilderness proposal. These are addressed below under the headings: "Fish Hatcheries," "Habitat Manipulation," and "Oil and Gas Staging Facilities."
3. Oil and Gas Studies and Leasing: The state has serious concerns with the process used by the FWS to determine the compatibility of oil and gas leasing with the purposes of the Kodiak NWR. These concerns do not reflect a substantive

position on the compatibility of oil and gas leasing with the purposes of the refuge. Until deficiencies in the determination process are addressed and a more sound basis for evaluation is presented, the state will limit its comments to procedural, as opposed to substantive, matters.

The state's concerns with this process can be summarized as follows: 1) Insufficient justification is provided for the FWS policy that leasing in "core minimal management" areas would be incompatible with refuge purposes. 2) The FWS has not adequately sought the views of the state and public on oil and gas leasing, as required by Section 1008(b)(2) of Alaska National Interest Lands Conservation Act (ANILCA). 3) A compatibility determination was made for the refuge without adequate information on the oil and gas resource potential of the area.

Based on these concerns, the state requests: 1) revision of the FWS policy on core minimal management areas, 2) withdrawal of the Compatibility Determination for Oil and Gas Leasing on Kodiak (Appendix O.), and 3) deferral of decision-making regarding oil and gas leasing to a step-down planning effort. A more detailed discussion follows.

The state has previously commented on the FWS policy concerning core minimal management areas. (See December 12, 1986, correspondence on the Final Togiak CCP; December 23, 1986 correspondence on the Draft Nowitna and Selawik CCPs; and January 30, 1987, correspondence on the Draft Koyukuk CCP.) This policy states "The Service will automatically consider oil and gas leasing to be incompatible with the purposes for which the refuge was established on those portions of the refuge that were designated as minimal management areas in all alternatives of the CCP." (See page 342, Draft Kodiak CCP.) Approximately 1.3 million acres or 82% of the Kodiak refuge fall in this category, as currently proposed in the CCP.

As previously stated, we believe this process for determining whether oil and gas leasing is compatible with refuge resources is significantly flawed. It provides little, if any, justification for closing vast tracts of land to oil and gas leasing. A review of recent refuge plans indicates that a large percentage of refuge lands across the state is being classified as core minimal management. (See table below.)

PERCENTAGE OF FEDERALLY-OWNED REFUGE LANDS IN
EACH MANAGEMENT CATEGORY

<u>Plan</u>	<u>Designated Wilderness</u>	<u>Proposed Wilderness</u>	<u>Core Min. Management</u>	<u>Minimal Management</u>	<u>Moderate/ Intensive</u>	<u>Wild River /Cooperat</u>
Kanuti (F)	-0-	-0-	71 %	-0-	29 %	-0-
Kodiak (F)	-0-	73 %	82 %	12 %	6 %	-0-
Koyukuk/N. Innoko (D)	10 %	-0-	90 %	-0-	-0-	-0-
S. Innoko (D)	35 %	-0-	63 %	2 %	-0-	-0-
Nowitna (D)	-0-	-0-	92 %	1 %	-0-	7 %
Selawik (D)	11 %	-0-	89 %	-0-	-0-	-0-
Tetlin (D)	-0-	-0-	69 %	2 %	29 %	-0-
Togiak (D)	57 %	8 %	33 %	9 %	-0-	1 %
Yukon Delta (D)	10 %	10 %	87 %	-0-	3 %	-0-
Yukon Flats (D)	-0-	8 %	57 %	43 %	-0-	-0-
AVERAGE	12 %	10 %	71 %	7 %	7 %	1 %

In addition to categorically closing most refuge lands to oil and gas leasing through a core minimal management designation, the FWS has included a determination in the Final Kodiak CCP that leasing on any part of the refuge would be incompatible with refuge purposes. Page 446 of the CCP states:

After considering the potential biological impacts of oil and gas exploration and development, as required under Section 304(b), along with the Department of Energy's national energy interest determination, and the views of the groups noted under Section 1008(b)(2) of ANILCA, the Service has reconfirmed that exploration and development of oil and gas would be incompatible with the purposes for which the Kodiak Refuge was established. (Emphasis added.)

The state cannot support this determination for reasons stated above. First, we do not believe the FWS has adequately carried out its responsibilities under Section 1008(b)(2) of ANILCA. Section 1008(b)(2) requires the FWS to ". . . seek the views of the Governor of the State of Alaska, Alaskan local governments, Native Regional and Village Corporations, the Alaska Land Use Council, representatives of the oil and gas industry, conservation groups, and other interested groups and individuals in determining which land should be studied and/or leased for exploration and development of oil and gas." The compatibility determination contained in the final CCP was not, in fact, released for public review in the draft CCP (or any other document). To the contrary, the draft CCP indicated that a refuge-wide compatibility determination would not be made until after an ROD was signed. Page 191 of the draft CCP states:

In the rest of the Kodiak Refuge, where adequate information on oil and gas potential is lacking, leasing will not be considered until the oil and gas potential of the refuge has been assessed, a compatibility determination has been completed, and a national interest determination has been made. No formal leasing program will be initiated prior to issuance of the record of decision, and a determination is made that leasing would be in the national interest, as called for in Section 1008. (Emphasis added.)

The state and other interested parties did not therefore have an opportunity to formally comment on this determination prior to its publication in final form. We do not, therefore, believe the FWS has adequately sought the views of the state and/or other interested parties on this subject.

Second, we agree with the draft CCP (page 191) that "adequate information on oil and gas potential is lacking" for the Kodiak NWR. We do not believe it is appropriate for the FWS to make compatibility determinations absent adequate information on potential. We note that in most, if not all, other CCPs, the FWS states that compatibility determinations will not be made until a Bureau of Land Management (BLM) resource assessment for the refuge has been completed. As stated in the Final Kanuti CCP:

Oil and gas leasing will not be permitted on the refuge until after completion of 1) an assessment of potential; 2) a national

interest determination; and, 3) a compatibility determination. A detailed assessment of the oil and gas potential of the refuge and the viability of development will be completed.

Based on the above, we urge the FWS to withdraw its oil and gas determination for the Kodiak NWR until a BLM assessment is completed and the public has been provided adequate opportunity to review the determination.

In general, the state recommends that the FWS prepare oil and gas compatibility determinations for more specific activities, proposals and land areas. A single determination for an entire refuge may overlook instances or areas where mitigating measures could adequately protect refuge land and resources. We further recommend that all determinations fully consider the effects of stipulations and mitigation techniques on minimizing the impacts of oil and gas development.

4. Oil and Gas Staging Facilities: The state has concerns about whether the 1/4 mile strip of coastline not recommended for wilderness designation adequately considers the potential need for oil and gas staging facilities in the event of a significant off-shore discovery. Because of limitations posed by geography, weather patterns, geological hazards, etc., facility siting could require use of land in excess of the 1/4 mile strip. In addition, in some cases, it may be in the interest of sound refuge management to locate staging facilities further than 1/4 mile from the coast.

Although we have no site-specific recommendations at this time to resolve this concern, we will be reviewing the Kodiak wilderness proposal as it is forwarded to the President and Congress for consideration. We would appreciate any effort by the FWS to address this potential need.

Additionally, we request that the ROD clarify that construction and use of oil and gas staging facilities in non-wilderness areas may be permitted, subject to a compatibility determination and preparation of an environmental impact statement. The management table on page 168 gives the mistaken impression that proposals for oil and gas staging facilities will be summarily dismissed.

5. Fish and Wildlife Management: Several issues of state concern relating to fish and wildlife management were recently discussed in a June 3, 1987, letter from the Department of Fish and Game (DFG) to the FWS (Enclosure 1).

The FWS responded to this letter on June 15, 1987 (Enclosure 2). Subsequently, the DFG has re-evaluated each issue contained in its original letter and has considered possible alternatives for resolving remaining concerns. These are described below.

- A. Fish Hatcheries: The FWS statement on this issue (see Enclosure 2) appears to positively address most of the state's concerns. We are pleased the FWS agrees with DFG's proposed language defining temporary structures. In order to clarify and signify our agreement on the definition of "temporary," we request that the agreed-upon definition be incorporated in the ROD.

Additionally, we request that the ROD acknowledge that fish hatcheries may be built and operated by non-profit associations, provided that they receive state approval. Accordingly, we suggest that the ROD clarify the discussion of fish hatcheries in Table 17, as follows: "The construction and operation of federal, state or state approved facilities for" The proposed language is underlined. This language is consistent with our understanding of the FWS response in Enclosure 2, which states "Non-profit associations are not categorically denied from seeking permits to conduct activities on refuges."

- B. Commercial Fishing Support Facilities: Remaining state concerns regarding this issue were recently expressed to the FWS in a June 19, 1987, letter from the Commissioner of DFG (Enclosure 3). We reiterate the position stated in this letter and request that the FWS respond to the letter's three recommendations in the ROD. In addressing the first of these recommendations, we request that the following statement be included in the ROD:

"Consistent with the Master Memorandum of Understanding between the FWS and the DFG, the FWS will cooperate with the DFG in determining whether the expansion of commercial fishing activities above 1979 levels on the Kodiak Refuge constitutes a significant expansion by forming a task force comprised of representatives from both agencies."

We also request that the policy language for this activity in Table 17 of the CCP be modified in the ROD, as follows:

"May be permitted, subject to reasonable regulations in accordance with provisions of ANILCA."

The management direction for all other land management categories should read "Same as I."

- C. Habitat Manipulation: The state has previously expressed concern over restrictions on the use of habitat manipulation techniques in minimal management and wilderness areas. While there may not be a need to utilize such techniques at present, habitat manipulation options should remain available to wildlife and fish managers for future consideration. Examples of the types of habitat manipulation activities that may be necessary include beaver dam removal, manipulation of water levels, and provision of artificial nest structures. We request that the ROD include a statement that habitat manipulation, while not necessary at the present time, will remain an optional tool for future wildlife and fish management.
- D. Pack Animals: We request that the ROD clarify that presently use of pack animals may be permitted on the refuge. Unless regulations are adopted to the contrary, Section 1110(a) and 811 of ANILCA and 50 CFR 36.21(b) authorize such use. We believe it is premature for the FWS to state that use of pack animals is "not permitted" (page 165). FWS intent to introduce regulations to restrict this use may be reconsidered and/or modified during the course of public review of any draft regulation.
- E. Other Motorized Vehicles: We request that the ROD clarify that the refuge manager may designate routes and areas where off-road vehicles may be used, consistent with 50 CFR 36.22. We recognize that no such routes or areas have been designated to date.
- F. Cabins: We request that the ROD clarify that cabins for subsistence purposes "may be built under special permit," consistent with treatment of this issue in the Final Kanuti CCP. Although there are presently few or no subsistence cabins in the refuge, the ROD should address this use in the event that need for such cabins arise.

We further request clarification in the ROD that construction of new cabins on the refuge may be allowed, if needed for the administration of the refuge or to provide for continuation of an on-going activity or use, per Section 1303(b) of the ANILCA. We recognize that a special use permit would only be issued if the proposed use, construction, and maintenance of the cabin were determined to be compatible with the purposes of the Kodiak NWR.

- G. House Log and Firewood Collection: We request that the ROD clarify that house log and firewood collection is "permitted, subject to reasonable regulations," consistent with treatment of this use in the Final Kanuti CCP.
6. Fish and Wildlife Research: We commend the FWS for its commitment to pursue cooperative studies and research with the DFG, as stated on pages 175-181 of the CCP. We suggest, however, that the ROD clarify FWS intent to consult with the DFG when setting priorities for such studies and research.
7. Sand and Gravel Removal: The draft CCP provided for small-scale sand and gravel leasing in moderate management areas on a case-by-case basis. The final CCP states that this use will not be permitted, although this policy change is neither explained in the CCP nor noted in the Summary of Changes from the Draft Kodiak Refuge CCP/EIS. The state requests the FWS return to its original policy, and that the ROD state that sand and gravel leasing may be allowed on a site-specific basis in moderate management areas, subject to reasonable regulation.
8. Shorelands, Tidelands, and Submerged Lands: The state requests that the following "generic" language be inserted in the ROD to clarify the "Navigable Waters" section (page 186) of the Final CCP:

The Submerged Lands Act of 1953, the Alaska Statehood Act of 1958 and the state constitution provide for state ownership of water (subject to the reservation doctrine) shorelands (the beds of navigable waters), tidelands (lands subject to tidal influence) and submerged lands (lands seaward from tidelands).

Determinations of what waters are navigable is an ongoing process in Alaska at both the administrative and judicial levels. To date, no waters have been determined by the BLM to be navigable on the Kodiak NWR, though some waters may be determined navigable in

the future. Pursuant to Sections 901(g) of ANILCA, those determinations are for the purpose of determining title to lands beneath navigable waters as between the United States and the State of Alaska.

The Service will work cooperatively with the state to ensure that existing and future activities occurring on the shorelands, tidelands and submerged lands are compatible with the purposes for which the refuge was established. In the future the Service may propose management actions to the state for these areas. The Service will pursue cooperative agreements with the state for the management of lands under navigable water bodies (shorelands).

Management of Watercolumns: To further clarify this subject, the state requests that the ROD include the following generic language on management of water columns:

The USFWS has authority to regulate certain activities on watercolumns to protect refuge lands, and for conservation purposes. These authorities stem from two provisions of the United States Constitution (the Property Clause and the Commerce Clause), ANILCA, and other authorities including the National Wildlife Refuge Administration Act of 1968, the 1899 Rivers and Harbors Act, the Fish and Wildlife Coordination Act of 1958, and the Migratory Bird Treaty Act. The state of Alaska also has authority to manage water based on the laws cited in the section on shorelands, tidelands and submerged lands above. These laws provide for water management by both the state and the Fish and Wildlife Service.

The USFWS will pursue cooperative management agreements with the state Alaska regarding public uses on waterways in the refuge. Agreements will be pursued only if a case-by-case resolution of management issues proves unacceptable to the USFWS and the state.

Water Rights: The discussion of water rights on page 186 is largely adequate with the exception of the phrase "reasonable amount of water reasonably necessary . . ." The state has alternatively requested the following substitute language: "minimum amount of water necessary . . ." It is acknowledged by both the state and the FWS that this issue will likely be resolved outside the CCP planning process. However, the state wishes to stay on record that the substitute language above should be used in all CCPs, and that the state will continue to seek an appropriate FWS definition of federal reserve water rights.

9. Hydroelectric Development: We request that the ROD clarify that both Power Project Withdrawals 2434 and 2743 are not within the boundary of the area proposed for wilderness designation. Power Project Withdrawal 2743 was created upon filing of the Terror Lake Federal Energy Regulatory Commission (FERC) License Application and surrounds existing project features that are located outside of Withdrawal 2434. Their boundaries do not coincide with one another. A status plat depicting both withdrawals is attached for your use.

The attached status plat depicts Withdrawal 2743 encompassing the alignment of the Hidden Basin Diversion. We believe this part of the withdrawal will be deleted in the near future on the basis of the as-built boundary drawings (enclosed) for Terror Lake Project filed with the FERC. However, we request clarification in the ROD that this area in Section 6, T30S, R23W, S.M. is excluded from the wilderness proposal to allow for the possible future construction of the Hidden Basin Diversion.

We request affirmation in the ROD that the Alaska Power Authority (APA) will be allowed to continue its FERC mandated studies, particularly on the Terror River, if this area were to be designated as wilderness. These studies cannot be conducted without the support of a helicopter.

We further request clarification of the statement on page 170 of the CCP that mechanical manipulation of fish and wildlife habitats will not occur within areas designated wilderness. By virtue of its basic operation and by FERC stipulation, the Terror Lake Project manipulates fisheries habitat in the Terror River.

10. Outfitters and Guides: We request clarification in the ROD that the proposed ceilings on the numbers of guides and outfitters will serve as guidelines for use in any one season, and that differences in the seasonal use and/or types of use will be considered in managing the actual number of allowable operators. For instance, in cases where the current permits are held by registered hunting guides, it should be possible to consider an additional request by an outfitter for a use such as photography tours during non-hunting seasons.

In addition, we request that DFG staff be included in the upcoming development of outfitter regulations for the Kodiak NWR because these issues are closely related to activities managed by the DFG.

11. Land and Float Planes: We request that the ROD clarify that the restrictions listed on page 165 regarding use of land and float planes are proposed only. In general, we urge the FWS to note proposed restrictions as such in the central management tables. We recognize that elsewhere in the CCP, the FWS lists proposed restrictions and states that the FWS will follow the procedures outlined in ANILCA and the Code of Federal Regulations before implementing proposed restrictions. However, the management tables are used for quick and easy reference and should therefore be clear.
12. Land Exchanges: The state recognizes that the Department of the Interior is currently contemplating land trades which may affect future ownership of 22(g) lands within the Kodiak NWR. Should ownership of these lands change at some point in the future, the state and public should be notified and a revision to the plan prepared. We request that the ROD reference such a process.
13. Public Involvement: We request that the ROD clarify the process for plan implementation and revision. Specifically, we suggest that the ROD incorporate the following language from the Final Kanuti CCP, stating FWS intent to:
 - Every three years, solicit public comments;
 - Review all public comments, local, state and federal recommendations, scientific data, and other information to update plan as needed;
 - Make minor changes as an appendix to the plan after approval by the Regional Director with notification of affected agencies and individuals; and,
 - Make major changes by going through the CCP planning process.

The state further urges that interested parties be notified of proposed minor changes prior to the approval by the Regional Director. We request that the language above be modified for the ROD to incorporate this additional step in the process.

14. Local Concerns: The state wishes to formally recognize the June 5, 1987, "GENERAL COMMENTS" submitted by the Kodiak Island Borough (KIB) to the FWS, and to note the substantial concern expressed by the KIB regarding this plan. (See attached comments.) We urge the FWS to initiate further discussion with the KIB, prior to signature of the ROD, in an effort to resolve these concerns.

We appreciate the opportunity to review the final CCP for the Kodiak National Wildlife Refuge. If you have any questions regarding these comments, please do not hesitate to call this office. We look forward to reviewing the upcoming Record of Decision.

Sincerely,

Robert L. Grogan
Director



By: Michelle Sydeman
CSU Coordinator

cc: Commissioner Judith Brady, DNR
Commissioner Don Collinsworth, DFG
Commissioner Dennis Kelso, DEC
Commissioner Mark Hickey, DOT/PF
Mr. John Katz, Office of the Governor
Mr. Rod Swope, Office of the Governor
Alaska Land Use Council Members
Land Use Advisors Committee Members

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- [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
- [1317] Dr. Robert Baker, Anchorage
- [1312] Mr. James Barkeley, Esq., Land Use Advisors Committee, Anchorage
- [1252] Mr. Michael Barton, U.S. Forest Service, Juneau
- [1037] Ms. Joyce Beelman, Department of Environmental Conservation, Fairbanks
- [1] Mr. Jay Bergstrand, Department of Transportation and Public Facilities, Anchorage
- [120] The Honorable Judy Brady, Department of Natural Resources, Juneau
- [1372] Mr. Al Carson, Department of Fish and Game, Anchorage
- [248] The Honorable Don Collinsworth, Department of Fish and Game, Juneau
- [1373] Mr. Donald D'Onofrio, National Ocean Service, Anchorage
- [1293] Mr. Bart Englishoe, Land Use Advisors Committee, Anchorage
- [1286] Mr. Boyd Evison, National Park Service, Anchorage
- [1117] The Honorable Jan Faiks, Anchorage
- [975] Mr. Darryl L. Fish, Bureau of Land Management, Anchorage
- [837] Ms. Linda Freed, Kodiak
- [203] Mr. Peter Freer, Department of Community and Regional Affairs, Juneau
- [1263] Mr. Joseph W. Geldhof, Department of Law, Juneau
- [1407] Mr. Harold Gillam, Land Use Advisors Committee, Fairbanks
- [944] Mr. Clay Hardy, U.S. Fish & Wildlife Service, Anchorage
- [1268] The Honorable Mark Hickey, Dept. of Transportation & Public Facilities, Juneau
- [9] Ms. Nancy Holguin, Division of Governmental Coordination, Juneau
- [1406] Reverend J. Michael Hornick, Land Use Advisors Committee, Anchorage
- [1413] Mr. Clark Horton, Federal Aviation Administration AAL-4, Anchorage
- [1271] Ms. Sharon Jean, Land Use Advisors Committee, Soldotna
- [444] Mr. John Katz, Office of the Governor, Washington, D.C.
- [1288] The Honorable Dennis Kelso, Department of Environmental Conservation, Juneau
- [1267] Ms. Leslie Kerr, U.S. Fish & Wildlife Service, Anchorage
- [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
- [1254] Mr. Joe Mazzoni, U. S. Fish & Wildlife Service, Anchorage
- [945] Ms. Janet McCabe, National Park Service, Anchorage
- [946] Mr. Ron McCoy, Alaska Land Use Council, Anchorage
- [1400] Ms. Cynthia Meyer, Division of Governmental Coordination, Juneau
- [1269] Mr. Mike Mitchell, Alaska State Library, Juneau
- [1316] Mr. Barry Moorhead, Federal Highway Administration, Juneau
- [947] Mr. Ron Morris, U.S. Department of Interior, Anchorage
- [499] Mr. Donald Nielsen, Bristol Bay Native Corporation, Anchorage

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- [1244] Capt. James R. Nutgrass, Department of Public Safety, Anchorage
- [1408] Mr. Richard Ogar, ARCO Alaska, Inc., Anchorage
- [1290] Ms. Debra Oylear, Division of Governmental Coordination, Anchorage
- [1287] Mr. Michael J. Penfold, Bureau of Land Management, Anchorage
- [1279] Mr. Gerald Rafson, Dept. of Transportation & Public Facilities, Fairbanks
- [1273] Mr. Randy Rogers, Northern Alaska Environmental Center, Fairbanks
- [1299] Mr. Wayne Ross, Land Use Advisors Committee, Anchorage
- [978] The Honorable Jerome M. Selby, Kodiak
- [87] Dr. Lidia Selkregg, 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
- [60] Mr. Jim Stratton, Land Use Advisors Committee, Juneau
- [22] Mr. Rod Swope, Office of Management and Budget, Juneau
- [1377] Mr. Len Vining, Department of Fish & Game, Anchorage
- [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