

LEGISLATIVE FINANCE-HOUSE / SENATE FINANCE COMM. FILES 8879

SJR 22 cont. ; SJR 27 571

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ALASKA OUTDOOR COUNCIL, INC.

3780 MCGINNIS DR. JUNEAU, AK 99801
(907) 789-3450

WILDERNESS POSITION

January, 1989

The Alaska Outdoor Council is taking a firm position against the creation of additional wilderness in Alaska until independent comprehensive studies have been completed to evaluate the impact of existing wilderness areas on Alaskans and outdoor users.

The Alaska Outdoor Council is the largest conservation organization in Alaska with 52 affiliated sportsmen and outdoor user organizations and a collective membership of over 10,000 Alaskans.

The Council wishes to clearly state that it supports the concept of designating some areas as "Wilderness". It is, however, against the indiscriminate designation of wilderness areas just to foreclose all development or to stop traditional hunting, fishing and trapping, or public recreational pursuits. The Alaska Outdoor Council recognizes that representative wilderness parcels are important segments of Alaska's land planning and management systems. It should not, however, be used as a panacea for all land management woes.

In 1980, Congress created 56.28 million acres of instant wilderness in Alaska with the passage of the Alaska National Interest Lands Conservation Act (ANILCA). The legislation also placed in motion the review of another 84.80 million acres of Federal lands for possible inclusion into the Wilderness system.

The question is, what has happened to public uses on the 56+ million acres of wilderness since 1980? Have the implementing regulations followed the intent of Congress? Have traditional outdoor recreational uses and subsistence activities been integrated or systematically restricted or eliminated through implementing regulations? What has been the economic impact of the wilderness classification?

Unfortunately, there has been no comprehensive review of the impact of wilderness designations on the life styles and economies of Alaskans. For that matter, wilderness impact studies are practically non-existent for the entire 90+ million acre Wilderness System in the United States today. Lacking such studies, it seems ludicrous to consider doubling the entire Wilderness system.

The Alaska Outdoor Council has received numerous complaints from its members that the Federal agencies have not complied with the intent of Congress when ANILCA was passed. At least 18 exceptions to the Wilderness Act were built into ANILCA to guarantee that Alaskan life styles would be integrated into any wilderness management system in Alaska.

Affiliated with National Rifle Association

- SPONSOR'S BACKGROUND MATERIALS -

The Alaska Outdoor Council is concerned that although there are positive and distinct habitat protection and other human outdoor values from wilderness classifications, there may be significant negative recreational and other Alaskan uses trade-offs which must be identified and evaluated before proceeding further with any additional "wilderness designations".

A 1988 Idaho study conducted by Trent Clark and Stephen Ford was summarized in a report entitled "Analysis of Wilderness/Non-Wilderness Acreage and Recreation Visitor Day Trends on National Forest System Lands". Some of the conclusions give us great cause for concern about the potential impact of wilderness designation on outdoor recreational opportunities. In particular, it was concluded that "the designation of 1.4 million acres of wilderness this year (in Idaho) could cost Idaho's recreation industry \$730 million a year by the year 2000".

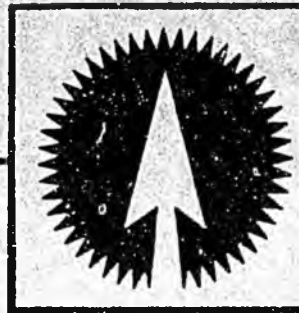
It is also imperative that the Federal managing agencies be forced to comply with the intent of Congress when it designates special exceptions for each wilderness area. Independent evaluations are the only way to carefully scrutinize how accurately the agencies have interpreted the intent of Congress in dealing with special Alaskan problems recognized in ANILCA.

Once Alaskan wilderness areas are carefully evaluated it can be determined if corrective legislative language is needed or whether the wilderness classification is actually suitable for Alaskans. If the legislative intent structured in the 1980 legislation is not being strictly followed then it makes sense to write even tighter legislation for future wilderness designations to guarantee agency compliance.

The Alaska Outdoor Council joins the National Rifle Association of America in opposing any expansion of the National Wilderness System until a comprehensive study of wilderness impacts in Alaska is completed and acceptable guarantees are built into future Wilderness designation legislation which protects outdoor user access, valid outdoor recreation pursuits, subsistence uses and sportsmen hunting, fishing and trapping activities.

It is the intent of the Council to place "Wilderness Designations" as one of its top priorities. Major emphasis will be placed on acquiring State and Federal funds for proposed studies, soliciting assistance from national sportsmen and outdoor user organizations plus directing Council resources towards public education and legislative lobbying in both Alaska and Washington, D.C.

The Council is transmitting this position statement to Alaskan political leaders and the Federal agencies now reviewing wilderness options in Alaska. The intent is to solicit support for our position and to request that our position of opposition be included in any agency reports to Congress.



Alaska Loggers Association Position Statement

SJR 22 - Relating to federal wilderness areas in Alaska

February 22, 1989

The Alaska Loggers Association fully supports SJR 22 in calling for a halt to any increase of federal Wilderness in Alaska. The 57 million acres of current federal Wilderness designations in Alaska makes up 62 percent of all Wilderness in the United States. In Southeast Alaska alone, 40% of all federal land is Wilderness (Forest Service and National Park lands).

Legislation has recently been introduced in Congress by Representative Mrazek which would establish 23 new Wilderness areas in the Tongass, comprising 1.8 million acres. If enacted, this would bring the Wilderness land base to 50% of all federal lands in Southeast Alaska. This addition to already excessive Wilderness would be a senseless addition to blind land management.

The federal land management planning process such as the current Tongass Land Management Plan is the best tool for designating land uses. The land planning process allows more flexibility by providing a variety of levels of use and protection.

The public planning process allows local citizens a better opportunity to say how the land should be used. Congressional Wilderness withdrawals take away the ability of the citizens of Alaska to make future land use decisions. If changes are needed in land plans, they can be revised without an act of Congress.

We fully agree with the resolution language that an increase in Wilderness is "unnecessary, unacceptable and against the best interests of the residents of the state."



Alaska Environmental Lobby, Inc.

P.O. Box 22151 Juneau, Alaska 99802

907-586-2345

ISSUE PAPER: SJR 22 - FEDERAL WILDERNESS AREAS IN THE STATE

The Alaska Environmental Lobby strongly opposes SJR 22. Wilderness is a management option which is extremely valuable for Alaska, and which is strongly supported by many Alaskans. It would be very poor public policy to foreclose so useful an option.

Wilderness is Alaska's most valuable resource. It is a commodity which is growing increasingly scarce, and our state is one of the few places able to satisfy the demand. It is the existence of grand and wild country that is the basis of our thriving tourist industry. Wilderness also gives us a benchmark against which to measure the changes in our world; an issue of greater urgency as words like "ozone" and "greenhouse effect" become part of our everyday life.

Federal wilderness in Alaska is a very flexible classification that allows such activities as traditional airplane and snowmachine access, personal use timber cutting, trapping and hunting, guaranteed access to inholdings, mining on existing claims, and development of visitor facilities such as campgrounds and trails. Subsistence activities are specifically provided for. Those who are not physically able to do more strenuous wilderness activities can fly in and take guided raft trips; handicapped recreation programs commonly go on ski-and-dog sled trips on the wilderness glaciers around Denali. I have personally guided far more people than I can count who were not outdoor types at all, and they have found the wilderness to be both accessible and enjoyable. And I have encountered peniless adventurers in the most remote places; people who found that economics were no barrier to the innovative.

Alaska has plenty of land upon which tourism and other development can proceed, but it is essential to conserve the key wild areas upon which tourism depends. The recent federal proposals are notable mainly for their minimal emphasis on wilderness and their promotion of such major developments as tramways onto the Harding Icefield. A number of Alaskans are actively working to strengthen - NOT weaken - those proposals.

Wilderness enhances, rather than blocks, the opportunities for traditional activities; and ensures a stable base for future options in tourism, science, and human sanity. We ask you to take a positive look at the benefits it offers to our long-term quality of life.

February 22, 1989
by Bill Glude

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STATE OF ALASKA

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OFFICE OF THE GOVERNOR

P.O. BOX AW
JUNEAU, ALASKA 99811-0165
PHONE: (907) 465-3562

DIVISION OF GOVERNMENTAL COORDINATION

February 22, 1989

The Honorable Bettye Fahrenkamp
Chairman, Senate Resources Committee
Alaska State Legislature
P.O. Box V
Juneau, AK 99811

Dear Senator Fahrenkamp:

At your request, I am writing regarding the Administration's position on Senate Joint Resolution 22.

As you are aware, the State has long maintained that wilderness designation is not mandatory to achieve any State interest. The State has pursued the interest of SJR 22 on several fronts. Generally, the State attempts to negotiate area specific recommendations with the Department of Interior (DOI). This is done initially with the federal agency director in Alaska. The Alaska Land Use Council forum is utilized, where appropriate. The State's Washington office has also assisted in bringing these issues to the attention of the Alaska delegation and to continue negotiation efforts with the DOI.

The State's experience has led us to conclude that focusing on wilderness proposals individually is the most effective way to influence DOI's wilderness proposal process. Recent examples include:

- ° 1,000,000 acre deletion from Denali National Park to provide for Kantishna mining area access and tourism development.
- ° A provision to allow access of an electrical transmission line from Bradley Lake to Anchorage across the Kenai Refuge.
- ° Ambler mining district exclusion.

In addition, DOI appears to be willing to recommend to Congress the deletion of several bays (of commercial fishing interest) from the present Glacier Bay wilderness.

The State is likewise attempting to influence the DOI area management planning process. These federal lands exist throughout Alaska. While these management plans do not recommend wilderness

Senator Bettye Fahrenkamp

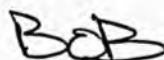
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February 22, 1989

classification, they nonetheless can have serious ramifications for Alaskans. For instance, the State has sought provisions to allow for lake fertilization and hatchery development in the Kodiak Refuge and has secured valuable access rights with navigable rivers arguments. We will continue to advocate for these interests as the federal land planning process evolves.

Thank you for the opportunity to comment. Please call if you have questions.

Sincerely,



Robert L. Grogan
Director

cc: Senate Resources Committee
Members

November 14, 1988

Mr. Boyd Evison
Regional Director
National Park Service
2525 Gambell Street, Room 107
Anchorage, AK 99503-2892

Dear Mr. Evison:

The State of Alaska has reviewed the thirteen final Wilderness Environmental Impact Statements (EISs) prepared by the National Park Service (NPS) pursuant to Section 1317 of the Alaska National Interest Lands Conservation Act (ANILCA). Based on our review of these documents, the state cannot support designation of any additional Wilderness in Alaska's national parks and preserves at this time. The following letter summarizes our primary concerns with the EISs and with NPS' Wilderness recommendations. Our comments are divided into three sections: I. National Environmental Policy Act (NEPA) Compliance, II. EIS Deficiencies, and III. Inappropriate Wilderness Recommendations. Comments on the specific Wilderness recommendations for each park were contained in the state's review of the draft EISs and are attached.

I. MINIMAL NEPA COMPLIANCE - SUPERFICIAL PUBLIC INVOLVEMENT

The NPS has not demonstrated genuine interest in working with the public and state to develop supportable Wilderness recommendations. NPS appears to have sought to meet the minimum legal requirements of the NEPA, without meeting NEPA's intent that the public be provided meaningful opportunities to participate in the development of these recommendations.

A. Public Comments Produce No Changes

Although NPS received extensive public comment on its wilderness proposals, including detailed, site-specific comments from the State of Alaska, NPS did not significantly modify any of its 13 recommendations. Given that NPS is studying approximately 18 million acres for possible wilderness designation and recommending approximately 7 million

acres for designation, one would expect that NPS would make at least a few significant changes to its proposals in response to public comment. Instead, there is little, if any, difference between the proposals contained in the draft and final EISs.

B. Response to Comments Unsatisfactory

The state found NPS' written responses to many public comments to be unsatisfactory. For example, in response to requests from the state and public that the NPS explain why it is recommending certain lands for wilderness and not recommending others, NPS writes: "It is not the purpose of an EIS to justify the proposal. The regulations of the Council on Environmental Quality caution against self-serving justification of proposals. The areas proposed qualify as wilderness and they are proposed because of this qualification." (Gates of the Arctic final EIS, page 141.) The state believes, however, that there is a middle ground between "self-serving justification of proposals" and providing the public with information with which to understand and assess a given proposal. NPS' response is also inconsistent with the fact that NPS is recommending only a third of the acreage which it determined qualifies for Wilderness designation.

C. Accelerated Review Schedule Evident in Quality of Documents

Though the official "task directive" for these EISs called for a 4-month public review period and a full year for the NPS to consider public comments and prepare final EISs, the public was ultimately given 67 to 102 days to review respective draft EISs, and the NPS spent less than three months preparing final EISs. This schedule was developed after the public and state protested a plan, initially defended by the NPS, to release three final EISs one day after the close of the comment period on draft EISs for the same parks. Although the state recognizes that NPS was directed to expedite completion of the EISs, we regret that the EIS project was not managed differently so that public involvement in the EIS process would not have been short-changed.

II. EIS DEFICIENCIES

A wide range of interest groups and individuals, as well as the State of Alaska, found the EISs to be seriously flawed.

A. Important Issues Dismissed

The NPS dismissed as insignificant many important issues raised by the public during preparation of the EISs.

Examples include the effect of wilderness designation on construction of a road from the Parks Highway to Kantishna, and from the Ambler mining district to the Red Dog port facility. (See Kobuk Valley draft EIS, page 59, and Denali draft EIS, page 94.) In both cases, the NPS argued that the effect of wilderness on these potential access corridors did not need to be addressed because road construction was not likely to be feasible. This questionable argument does not justify ignoring such important issues.

B. Description of Wilderness Management Lacking

Although the state recommended during "scoping" that the EISs clearly describe the differences between NPS management of Wilderness and non-Wilderness areas, the draft EISs did not clearly or comprehensively describe these differences. The state reiterated its recommendation following review of the draft EISs. In response, NPS did include a table in the final documents which identifies many of these differences. Though we appreciate the inclusion of this table, we believe it was provided too late in the process to help the public to fully assess the impacts of Wilderness designation.

C. Impacts Overstated

Without adequate justification, the EISs consistently predict degradation of wilderness values if parklands are not designated as wilderness. This conclusion is not supported by NPS' own estimates of future development and use of the parks. In contrast, NPS appears to have underestimated the effects of wilderness on human use of the parks. For example, the EISs state that Wilderness will have no effect on subsistence activities or access. In fact, however, Wilderness designation can effect both of these. For example, Wilderness precludes the designation of routes and areas where off-road vehicles can be used for subsistence purposes.

D. Wilderness Criteria Lacking

The EISs omit basic information regarding the wilderness recommendations, e.g., why the NPS is recommending certain lands for wilderness designation and not others. Little, if any, information is provided regarding the criteria used to develop wilderness proposals or the specific resources and Wilderness values each proposal seeks to protect. The following quotations from public comment letters to the NPS address this deficiency:

"We would like to see greater emphasis on criteria, analysis, and rationale in the wilderness

recommendations Decisions concerning vast land areas such as these, some with millions of acres in question, deserve to be supported by detailed analyses. Yet these recommendations for management units the size of some states contain about the same level of analytic detail as a typical conceptual plan for a town square or city park." (Land Use Advisors Committee, July 15, 1988).

"The draft EIS does not describe any of the methodology, quantitative or qualitative, that was used to generate the alternatives." (Resource Development Council, May 27, 1988, comments on the Yukon-Charley Rivers draft EIS.)

"The real issues of criteria for wilderness/non-wilderness recommendation, alternative formulation, and boundary determination are obscured. What little real information is contained in these questionable documents is endlessly repeated in slightly altered 'boilerplate' fashion throughout each draft EIS. Such capricious waste of public time and money is reprehensible." (Northern Alaska Environmental Center, June 15, 1988.)

III. INAPPROPRIATE WILDERNESS PROPOSALS

As clearly delineated in our comments on the draft EISs, the state objects to inclusion of certain parklands in NPS Wilderness proposals. The following are examples of lands determined by the state to be inappropriate for wilderness.

A. Access

Several areas proposed for wilderness designation may be needed in the future for construction of roads. Examples include the northern addition of Denali National Park and Preserve, where a road connecting the Parks Highway and the Kantishna Hills has been proposed; and portions of Noatak, Kobuk Valley, and Cape Krusenstern, where a road connecting the Ambler mining district with the Red Dog port facility has been proposed. Gaining federal approval for a transportation right-of-way would likely be more difficult through wilderness than non-wilderness parklands.

B. Visitor Facilities/Tourism

Some areas proposed for Wilderness may be needed in the future for visitor facilities, which are not allowed in wilderness areas. Since such a high percentage (65%) of NPS lands in Alaska are already in Wilderness status, the state

believes options for future visitor-related development should be maintained on existing non-Wilderness parklands, unless a compelling reason exists to preclude these options. The NPS has not provided such compelling rationale in its EISs. Examples of where additional or new facilities may be needed include Katmai, Kenai Fjords, and Denali.

C. Incompatible Uses

Several areas proposed for wilderness are currently used in ways that are not compatible with wilderness management. For example, Dundas Bay, Charpentier Inlet, and Skidmore Bay within Glacier Bay National Park and Preserve have been for many years by commercial fishermen. The proposed wilderness area in Cape Krusenstern contains 37 Native allotments and is used extensively by local residents. The nearby Wilderness proposal for Kobuk Valley contains 13 Native allotments and also receives regular use. Much of the activity in these areas is supported by mechanized forms of access, which local residents fear may eventually be regulated more stringently in Wilderness than in non-Wilderness areas. (This concern is supported by the NPS proposal in the Glacier Bay EIS to prohibit motorized access in marine waters within the Wilderness boundaries.) The state has identified areas in Wrangell-St. Elias, Katmai, Glacier Bay, and other park units where wilderness would be inappropriate for this reason.

D. Mining Claims

Several areas proposed for wilderness contain mining claims (e.g., in Katmai, Denali, and Kenai Fjords). Wilderness designation in these areas would likely make mineral development more difficult, since claimants would be required to show that their activities would not degrade the wilderness character of adjoining areas.

E. Navigable Waters and Revised Statute (RS) 2477 Rights-of-Way

Several areas proposed for wilderness include possible RS 2477 rights-of-way and waterbodies which are or will likely be determined navigable. The state opposes inclusion of these areas in NPS wilderness recommendations to minimize the potential for conflicts between the state and federal government over management of these areas. Examples of navigable water bodies within wilderness proposals include the Chitina River, Naknek Lake, and Charley River; examples of possible RS 2477 rights-of-way include the Stampede Trail in Denali and the Kotsina trail in Wrangell-St. Elias.

Based on our comments on the draft EISSs, as well as the concerns summarized above, the State of Alaska urges the NPS to withdraw the Wilderness recommendations contained in these EISSs. We urge the NPS to recommend no additional wilderness unless and until the NPS:

- 1) better analyzes the socio-economic effects of designating more Wilderness in Alaska;
- 2) provides more comprehensive and forthright information on the differences between management of Wilderness and non-Wilderness parklands;
- 3) provides clear rationale for recommending additional wilderness and for recommending particular parklands for designation; and,
- 4) works more closely with the state and public to identify areas where Wilderness designation is and is not appropriate, consistent with the attached state recommendations.

We appreciate the opportunity to summarize our concerns regarding the final EISSs. Please do not hesitate to call this office if we can be of assistance in clarifying these comments.

Sincerely,

Robert L. Grogan
Director

By Michelle Sydeman
State CSU Coordinator

Attachments

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

STATE OF ALASKA

WILDERNESS RECOMMENDATION SUMMARY

DENALI NATIONAL PARK AND PRESERVE

(See State of Alaska comments dated August 29, 1988.)

RECOMMENDATION:

The State of Alaska opposes designation of the northern park addition as Wilderness.

RATIONALE:

- 1) Designation of this area as Wilderness would make development of a northern access route from the Parks Highway to Kantishna more difficult. Such a route would alleviate pressure on the existing park road, provide additional opportunities for visitors to enjoy the park, and facilitate mineral development in the Kantishna area.
- 2) There are numerous possible Revised Statute (RS) 2477 rights-of-way within the northern park addition. (See the map provided on page 189 of the Denali General Management Plan [GMP].) Although Wilderness designation would not affect validity determinations for these rights-of-way, Wilderness management could conflict with future uses and/or development of these routes.
- 3) The state asserts that portions of the Tokositna, Muddy, and Kantishna rivers are navigable. Designation of lands adjacent to these rivers as wilderness could increase the potential for state/federal management conflicts.

RECOMMENDATION:

The State of Alaska opposes Wilderness designation of the southern park addition from the east side of the Eldridge Glacier to the eastern boundary of the park, near Cantwell.

RATIONALE:

- 1) This area encompasses the Cantwell/Dunkle Mine area and contains more than 100 unpatented mining claims. Designation of this area as Wilderness would likely make development of these claims more difficult.
- 2) This area also contains state, regional, and village corporation lands and selections. Future use and development of these lands may not be consistent with Wilderness management. The state urges the National Park Service (NPS) to avoid potential Wilderness conflicts by deleting this area from the Wilderness proposal.

- 3) Both this area and the northern park addition are used regularly by local rural residents engaged in traditional activities. The state is concerned that, over time, Wilderness designation may lead to restrictions or access methods and activities currently allowed within Wilderness. The state therefore does not support Wilderness designation in these areas.

GLACIER BAY NATIONAL PARK AND PRESERVE

(See State of Alaska comments dated August 29, 1988.)

RECOMMENDATION:

The state is appreciative of the substantial effort the NPS has invested in working with local user groups to find an appropriate management strategy for Glacier Bay's Wilderness waters.¹ We recognize that the NPS' proposed action represents an attempt to accommodate diverse interest groups, and that no solution will be entirely satisfactory to any one interest.

The state offers the following new alternative with the same objective in mind. We support deletion of certain Wilderness waters, designation of a limited acreage of new Wilderness waters, closure of certain Wilderness waters to motorized vessels and aircraft landings, and seasonal restrictions on commercial fishing activity and motorized vessel use in a limited number of areas. The state's preferred alternative is described below:

WATERS:

Areas to be retained as existing Wilderness

Adams Inlet (starting 2 miles East of the inlet entrance)

Areas to be deleted from existing Wilderness

Beardslee Islands
Adams Entrance
Rendu Inlet
Hugh Miller Inlet
Dundas Bay
Charpentier Inlet
Skidmore Bay

Added Wilderness

¹The State of Alaska does not waive or otherwise concede its claims of ownership to the submerged lands in the territorial waters adjacent to Glacier Bay. See United States v. California, 436 U.S. 32 (1978) (California has dominion over submerged lands surrounding Channel Islands National Monument established by Presidential Proclamation): cf. Utah Division of State Lands v. United States, 107 S. Ct. 2318 (1987) (Title to submerged lands passes to state upon admission to Union).

Muir Inlet above Sealers Island
Wachusett Inlet (starting 3 miles west of the inlet entrance)

LANDS:

The state does not support designation of any additional Glacier Bay lands as Wilderness.

RATIONALE:

Commercial fishing has been occurring in Glacier Bay waters since before the Glacier Bay National Monument was established in 1925. To date, there is no evidence that this activity is harming local resources, and no evidence to this effect is presented in the Environmental Impact Statement (EIS). Given this lack of substantiating evidence, the state supports the NPS' efforts to delete waters used for commercial fishing from Wilderness.

The NPS' proposed action recommends deletion of the Beardslee Islands, Adams Entrance, Rendu Inlet, High Miller Inlet, and Dundas Bay Narrows. The state believes three additional areas should be excluded: the remainder of Dundas Bay, Charpentier Inlet, and Skidmore Bay. Dundas Bay is an important area for commercial crabbing. As the NPS notes in its Commercial Fishing in Glacier Bay National Park (1987), 452 crab pots were counted in Dundas in July 1987. This represents a substantial crabbing effort. In addition, the state supports deletion of Charpentier Inlet and Skidmore Bay. These areas are also used for commercial fishing.

The state recognizes that Charpentier Inlet and Skidmore Bay offer significant opportunities for solitude and primitive recreation (e.g., kayaking). The state suggests that the NPS consider implementing seasonal closures on motorized vessel use and aircraft landings in these areas during the summer months, as most commercial fishing occurs during the winter.

The state would also support motorized access closures for Wachusett Inlet and Muir Inlet above Sealers Island. Closure of these areas would provide significant opportunities for solitude and primitive recreation.

The state does not support designation as Wilderness of the Deception Hills east of Doame River, the two parcels adjacent to Gateway Knob, the island adjacent to Blue Mouse Cove, and Cenotaph Island. Approximately 81 percent of Glacier Bay National Park and Preserve is already in Wilderness status. We do not see the need for adding additional land-based Wilderness areas. In addition, we are concerned that, overtime, wilderness designation may lead to restrictions on traditional activities (e.g., use of aircraft), which the state would not support.

RECOMMENDATION:

The state requests that the Wilderness boundary in the Deception Hills area be moved to the western edge of the Grand Plateau Glacier.

RATIONALE:

- 1) Section 103(b) of the Alaska National Interest Lands Conservation Act (ANILCA) states Congress' intent that "wherever possible boundaries shall follow hydrographic divides or embrace other topographic features." The NPS took advantage of the opportunity provided by Section 1317 of ANILCA and included recommended Wilderness boundary adjustments in its Wilderness EIS for the Wrangell-St. Elias National Park and Preserve. The state supports this approach and requests that revisions to the Glacier Bay boundary be recommended in this EIS.
- 2) The boundary in the Deception Hills area northward to the outlet of Alsek Lake is nearly impossible to locate in the field. Consistent with our previous recommendations to the NPS during GMP preparation, we recommend the wilderness boundary (and eventually the Park boundary) be moved to the western edge of the Grand Plateau Glacier. It is our understanding that NPS management in this area would be simplified by this change. This would also simplify continued use of the area by local citizens who currently have difficulty in identifying the boundary.

Considerable local boating and aircraft activity is conducted on the Alsek River and Lake. The river and lake are navigable for a long distance into the park. We believe it would help NPS management if a portion of the Wilderness boundary on the lake shore were deleted. This would reduce conflicts between continued uses of the area and perceived management needs.

WRANGELL-ST. ELIAS NATIONAL PARK AND PRESERVE

(See State of Alaska comments dated July 18, 1988.)

The state supports NPS' objective to create more identifiable field boundaries for Wilderness areas and to eliminate the potential for land uses that might conflict with Wilderness and/or park/preserve purposes. To further these objectives, the state requests that the NPS make the following changes to the Proposed Action (Alternative 2).

RECOMMENDATION:

The state requests that the Wilderness boundary in the preserve adjacent to the Malaspina Glacier be modified to follow more recognizable hydrographic features (see Map A).

RATIONALE:

- 1) This recommendation would exclude a large, un-named, state-owned lake from the Wilderness boundary.
- 2) This boundary follows more easily identifiable hydrographic features and elevation contours. The glacier's edge has substantially retreated since the topographic map was made in 1961. The exposed land has re-vegetated in recent years and much of the proposed boundary is no longer recognizable in the field, even though it appears to make sense on the map. The state's proposed boundary follows more definable water bodies or steep slopes.
- 3) The lakes and washes in this portion of the preserve are relatively well used by nearby Yakutat residents for aircraft landings, boats, hunting, fishing, etc. These use levels make this area undesirable for Wilderness.

RECOMMENDATION:

The state requests that the Bremner Bar be deleted from the Bremner River Wilderness recommendation (see Map B).

RATIONALE:

- 1) The Bremner Bar is a broad, sandy, partially vegetated river bar, portions of which are likely state-owned based on the navigability status of the Copper and Bremner rivers. Given that the land status of this bar has not been determined (and it would be difficult to base a Wilderness boundary on such uncertain status), the state recommends that the Bremner River Wilderness boundary end at the point at which it enters the Copper River flat lands.

- 2) The modified boundary would be easier to locate in the field, and would thus be more manageable.

RECOMMENDATION:

The state requests that the northwest Wilderness boundary from the Kotsina River to Copper River and Copper Lake be moved from the 3,000-foot contour, as proposed, to the 4,000-foot contour. (Map C shows a portion of this boundary adjustment.) This revision would exclude the broad valley north of the Copper Glacier and the isolated mountain in T. 6 N., R. 9 E.

RATIONALE:

- 1) Much public use of the flanks of Mount Drum, Mount Sanford, and Mount Wrangell occurs between 2,500-3,500 feet. This band contains numerous winter and summer trails, cabins, and air access points (strips and gravel bars). To reduce management conflicts, these areas should be excluded.
- 2) A major access trail from the Kotsina River crosses several drainages in this area, including the Nadina, Dadina, Chetaslina, and Cheshnina Rivers. Both the existing and proposed Wilderness boundaries cross back and forth over this trail. The trail is used by motorized vehicles, including off-road vehicles (ORVs), and should be excluded from Wilderness.
- 3) The 3,000-foot contour proposed by the NPS generally follows gentle slopes and would therefore be more difficult to identify in the field. The 4,000-foot contour more closely corresponds to steeper slopes, making field identification and management easier.

RECOMMENDATION:

The state requests that the Sheep Lake (T. 6 N., R. 11 E.) and Grizzly Lake (T. 5 N., R. 11 E.) be excluded from the Wilderness recommendation. This could be accomplished by moving the boundary to the 4,000-foot contour along Goat Creek to the junction of Jacksina Creek (see Map D).

RATIONALE:

- 1) These lakes and the access trail to them are heavily used and therefore inappropriate for Wilderness. Access to the lakes and surrounding area has traditionally been gained by aircraft, ORVs and horses, creating a difficult management situation in its present status. Excluding the lakes and trail from Wilderness would help alleviate these management conflicts.

- 2) The 4,000-foot contour boundary would be more easily recognizable in the field than the straight line boundary cutting across Goat Creek.

RECOMMENDATION:

The state requests that the Wilderness boundary between Goat Creek and Gold Hill be redrawn along more easily recognizable features (see Map D). From Goat Creek, the boundary should follow the south side of the valley floor along Pass Creek, excluding the existing trail from Wilderness. At the pass, the boundary should follow Wait Creek to the 3,000-foot contour, then to the north end of Gold Hill at the same elevation.

RATIONALE:

This change would improve identification of the boundary in the field, and exclude Pass Creek trail from Wilderness.

RECOMMENDATION:

The state requests that the boundary from Gold Hill to the Nabesna Glacier be modified along the 4,000-foot contour (see Map E).

RATIONALE:

- 1) This relatively minor change places the Wilderness boundary along the steeper slopes above the Nabesna River, thereby alleviating possible confusion in and south of the Fish Creek drainage. The crossing of the Nabesna Glacier could either remain unchanged, or be moved to the 4,000-foot contour.
- 2) The 4,000-foot contour more nearly approximates the original congressional boundary.

RECOMMENDATION:

The state requests that the portion of the upper Chitina Valley in the vicinity of Bryson Bar be excluded from existing Wilderness (see Map E). Ideally, the state suggests that the Wilderness boundary follow Canyon Creek to T. 7 S., R. 18 E., then to the slope of Canyon Creek at the 4,000-foot contour, then continue east across to Barnard Glacier to the face of the Chitina Glacier before re-joining the park/preserve boundary south of the Chitina River. At a minimum, the land below the 2,000-foot contour in this area should be deleted from Wilderness.

RATIONALE:

- 1) This area is heavily used for recreation, including use of aircraft, ORVs, and other mechanized equipment. It has reportedly been a difficult area for the NPS to manage because of traditional uses, including extensive recreational access. This boundary adjustment would reduce these conflicts.
- 2) This area contains active horse grazing leases, (e.g., at Bryson Bar). Wilderness designation may jeopardize these leases and the historical use of horses in the upper Chitina Valley.

RECOMMENDATION:

The state requests that the remaining section of the Beaver Creek Trail between Beaver Lake and Horsefeld be deleted (see Map F).

RATIONALE:

- 1) We appreciate the fact that the NPS has proposed deletion of Beaver Lake, and that the small addition to the south avoids the Beaver Creek Trail. However, the remaining segment of trail east of Beaver Lake is still in Wilderness, which legally precludes the ORV use this trail has historically accommodated. It would make sense to revise the Beaver Lake deletion to ensure that the entire trail is outside the Wilderness boundary for management consistency.

RECOMMENDATION:

The state requests that the proposed Wilderness recommendation encompassing the south slope of MacColl Ridge and the adjacent Chitina River be deleted.

RATIONALE:

- 1) This area is one of high use, both currently and historically. While the current types of use are technically compatible with Wilderness management according to ANILCA, the state is concerned that these activities (e.g., air access) may be restricted in the future to protect Wilderness values. Further, the state believes existing use levels on MacColl Ridge are not compatible with Wilderness designation.
- 2) The proposed addition includes the navigable Chitina River. The state opposes the inclusion of state-owned navigable waterways in new Wilderness recommendations.

Some of the Wilderness boundaries that the NPS and/or the state are proposing to adjust to ease management and increase recognition in the field are also park/preserve boundaries. In most instances, if the Wilderness boundary is adjusted, the corresponding park/preserve boundary should also be adjusted so that they conform. We recognize that changes to the park/preserve boundaries are not addressed in these EISs; however, we wish to raise the issue for consideration as the Wilderness recommendations are forwarded to Congress. If the Wilderness boundaries are improved to follow more readily discernible geographic features, then it makes sense for the park/preserve boundaries to follow the same features, unless there is some negative consequence to doing so. This rationale applies equally to Wilderness additions as well as deletions, (e.g., at Icy Bay, Goat Creek, Copper Lake, Bremner Bar, and the west flank of Mount Drum).

NOATAK NATIONAL PARK AND PRESERVE

(See State of Alaska comments dated August 29, 1988.)

RECOMMENDATION:

The state opposes designation of 757,175 acres or 100 percent 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 percent 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 the Noatak National Preserve. These three possible corridors are a road, railroad, and 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 areas 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 Northwest Arctic Native Association 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 percent 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, the 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:

The state requests that the boundary of the existing wilderness on the Township 27/28 North township line be modified 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.

CAPE KRUSENSTERN NATIONAL MONUMENT

(See State of Alaska comments dated August 12, 1988.)

RECOMMENDATION:

The state requests that the state lands, including state-owned tide and submerged lands, be deleted from the Wilderness recommendation.

RATIONALE:

It is unreasonable to consider that the state might someday convey ownership of the state-owned lagoons to the NPS, as could be implied by the discussion on page 17 of the draft EIS. The state has very limited authority to convey tide and submerged lands, and this authority rests only with the state legislature. Since there is virtually no chance that the NPS will acquire these lands, such a contingency-based recommendation is misleading and inappropriate.

If the NPS has certain management preferences for state-owned lands, a cooperative agreement would be a more reasonable and potentially productive method of influencing management of these areas.

RECOMMENDATION:

The state requests that the coastal areas be deleted from the Wilderness recommendation.

RATIONALE:

- 1) The coastal fringe contains numerous inholdings, including over 70 Native allotments. These inholdings and their associated uses would make Wilderness management more difficult. The coastal fringe is also used extensively for commercial and subsistence fishing support facilities, ORVs, and mechanized equipment.
- 2) A well-used trail (and possible RS 2477 right-of-way, the Coastal Winter Trail) runs along the coast. Associated with this trail are other access trails and shelters. Avoiding Wilderness in the vicinity of this trail would help insure that year-round traditional activities and access patterns are protected from more stringent regulation.
- 3) If state lands (e.g., offshore oil and gas activities in the Hope Basin) are ever developed, a modified boundary would protect the Wilderness area from the possible visual and other impacts of adjacent development. While no oil and gas

lease sales in the Hope Basin are currently scheduled, they have been discussed and could occur in the future.

RECOMMENDATION:

The state requests that the portions of the monument that are crossed by trails that have been used for subsistence and other traditional uses (see attached map) be deleted from Wilderness.

RATIONALE:

Wilderness would not automatically preclude the extensive use and access patterns in Cape Krusenstern. However, we believe that, over time, management of these uses may become unnecessarily stringent under Wilderness designation. The state's December 5, 1986, letter to the NPS provided information on trails used for access to inholdings, subsistence and other traditional uses. In the absence of a thorough discussion of these trails and related cabins and fishing sites, it appears that Wilderness designation could significantly impact these uses. Thus, we recommend that the NPS delete these trails from Wilderness, or provide assurances that existing patterns of use and mechanized access (including ORVs and snowmobiles) will be maintained in the future, if any areas are recommended for Wilderness.

RECOMMENDATION:

The state requests that the upland areas of the monument which are underlain by bedrock similar to those containing the Red Dog deposits (see attached map) be deleted from Wilderness.

RATIONALE:

The state recognizes that park lands, regardless of Wilderness status, are closed to new mineral entry. However, Wilderness designation would likely make it more difficult for adjacent landowners to conduct geological investigations. Such studies could be integral to understanding the mineral potential of adjacent non-federal lands.

RECOMMENDATION:

The state requests that the portion(s) of the Wilderness recommendation covering possible routes of a transportation corridor from the Red Dog port facility to the Ambler mining district be deleted.

RATIONALE:

Maximum flexibility should be maintained for a corridor from the Red Dog port to the Ambler mining district. Technically,

Title XI does provide a mechanism for developing such a corridor within Wilderness. There is no doubt, however, that a Wilderness designation would make successful application of Title XI more difficult.

SUMMARY RECOMMENDATION:

In light of the specific recommendations above, the numerous conflicts identified, and the lack of compelling benefit from designation of any Wilderness, the state suggests that the no action alternative may be the most appropriate in this instance. The attached map roughly outlines the potential conflict areas identified in Cape Krusenstern. It appears that the remaining areas would not be manageable or particularly valuable if placed in Wilderness status.

KATMAI NATIONAL PARK AND PRESERVE

(See State of Alaska comments dated August 29, 1988.)

RECOMMENDATION:

The state opposes the NPS proposal to designate Battle and Kulik lakes, Lake Colville, the northern portion of Naknek Lake, and Naknek Lake's North Arm and Iliuk Arm as Wilderness.

RATIONALE:

- 1) The state asserts that these waterbodies are navigable and, therefore, the state owns and has management authority over the submerged lands (shorelands) and the watercolumns above them. Designation of these waters as Wilderness would be inappropriate. In addition, designation of adjacent uplands as Wilderness could increase the potential for state/federal management conflicts.

RECOMMENDATION:

The state opposes designation of 2,605 acres at Geographic Harbor and 3,370 acres on the southeast side of Kukak Bay as Wilderness. Furthermore, should the NPS acquire the three small parcels of privately-owned land along the Pacific Coast at Katmai Bay, Kukak, and Kaguyak, the state recommends that they remain in non-Wilderness status.

RATIONALE:

- 1) Each spring, the Alaska Department of Fish and Game uses a cabin at Geographic Harbor as a staging area for fisheries studies. These studies typically require several biologists and the use of a helicopter. To avoid any possible conflicts with Wilderness management, the state opposes inclusion of this area in Wilderness.
- 2) Kukak Bay is used by commercial fishermen harvesting salmon, herring, crab, and clams. As noted in the EIS, the remains of a clam cannery are still standing in the area proposed for Wilderness designation. The state believes it may be advantageous to leave this area in non-Wilderness status to provide for uses incidental to commercial fishing activity.
- 3) In addition, the five sites being proposed for Wilderness designation along the Pacific Coast are the only coastal (e.g., shore-based temporary facilities) areas in Katmai where visitor facilities could be built in the future, if deemed desirable and appropriate. The state believes

opportunities for future visitor development in these areas should be maintained.

RECOMMENDATION:

The state opposes designation as Wilderness of the area north of Battle Lake and the divide between the park and preserve.

RATIONALE:

- 1) A 60-acre mining claim group, which contains three unpatented lode claims, is located in this area. Wilderness designation would likely make development of these claims more difficult.
- 2) There are two private lodges in this vicinity, Battle Lake Camp and Kulik Lodge. Expansion of these facilities in the future may be seen as inconsistent with Wilderness management.

KENAI FJORDS NATIONAL PARK

(See State of Alaska comments dated May 27, 1988.)

RECOMMENDATION:

The state requests that the Nuka River drainage be excluded from the Wilderness recommendation.

RATIONALE:

The Alaska Power Authority (APA) and the NPS signed an agreement on June 16, 1986, regarding the diversion of Nuka River headwaters to provide water for the Bradley Lake hydroelectric project. There is a re-opener clause in the agreement which would allow NPS to modify the agreement after ten years, if it is determined to be in conflict with park purposes. The APA is concerned that, if this area were designated as Wilderness, it could be argued that the purpose of the park is to preserve Wilderness and, therefore, natural flows should be restored. Although the state would disagree with this position, we believe it is prudent to avoid this potential conflict by deleting the Nuka River drainage from the Wilderness recommendation.

RECOMMENDATION:

The state requests that Aialik Bay, McCarty Fjord, and West Arm be deleted from the Wilderness recommendation.

RATIONALE:

- 1) The state believes the NPS should retain the option of developing visitor facilities along some portions of the Kenai Fjords coastline. Wilderness designation would preclude development of most visitor facilities.

The state recognizes that excluding Aialik Bay, McCarty Fjord, and West Arm from the Wilderness recommendation may not be the only way to retain NPS management options for visitor developments. These exclusions are proposed as one example of an appropriate mix of Wilderness and non-Wilderness lands.

- 2) The state owns all tide and submerged lands adjacent to the park and is responsible for issuing tideland leases and permits for docks, mariculture facilities, temporary camps, and other activities. Designation of coastal uplands as Wilderness may increase the potential for conflicts between the NPS and the state regarding state management of tide and submerged lands. Reducing the amount of coastline

CORRECTION

**THIS DOCUMENT
HAS BEEN REPHOTOGRAPHED
TO ASSURE LEGIBILITY**

7W

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- 2) The state owns all tide and submerged lands adjacent to the park and is responsible for issuing tideland leases and permits for docks, mariculture facilities, temporary camps, and other activities. Designation of coastal uplands as Wilderness may increase the potential for conflicts between the NPS and the state regarding state management of tide and submerged lands. Reducing the amount of coastline

recommended for Wilderness may minimize this potential for conflict.

- 3) There are eight unpatented gold mining claims near West Arm and McCarty Fjord within the area recommended for Wilderness. Wilderness designation in this area may make it more difficult to mine these claims.

GATES OF THE ARCTIC NATIONAL PARK AND PRESERVE

(See State of Alaska comments dated July 18, 1988.)

RECOMMENDATION:

The state does not support designation of the northeast preserve as Wilderness, as recommended by the NPS in the preferred alternative.

RATIONALE:

- 1) Approximately 85 percent of the preserve (or 7.3 of 8.5 million acres) is already in Wilderness status. The EIS does not present clear rationale for designating an additional 330,846 acres as Wilderness.
- 2) ANILCA provides the NPS with ample authority to protect the land and resources of the northeast preserve. Section 201(4)(a) of ANILCA directs the NPS to manage the entire park and preserve for the following purposes, among others:

"To maintain the wild and undeveloped character of the area, including opportunities for visitors to experience solitude, and the natural environmental integrity and scenic beauty of the mountains, forelands, rivers, lakes, and other natural features; to provide continued opportunities, including reasonable access, for mountain climbing, mountaineering, and other Wilderness recreational activities; and to protect habitat for and the population of fish and wildlife, including, but not limited to, caribou, grizzly bears, dall sheep, moose, wolves, and raptorial birds."
- 3) The state understands that the northeast corner of the preserve was designated as non-wilderness preserve by ANILCA primarily to protect opportunities for sport hunting. Most hunters reach this area by aircraft. Although technically Wilderness does not prohibit or restrict aircraft access, Wilderness designation may, over time, lead to restrictions on mechanized access, including use of aircraft. Because the northeast preserve is remote and inaccessible, as noted on page 14, the state would not support curtailment of current access opportunities.
- 4) The draft EIS notes on page 55 that the Dalton Highway, part of which was opened to public use in 1981, may spur new development and demands for additional recreational access. Because most of the preserve is in Wilderness status, opportunities for the development of visitor facilities within the preserve near the road corridor are limited to

the northeast preserve. As the EIS states on page 72, "this area would not remain available for possible future development of facilities," if designated as Wilderness. As an example, the docking facilities and primitive campgrounds at Itkillik and Oolah lakes, which are contemplated under Alternative 1, (the no action alternative) would likely not be constructed if this area were designated as Wilderness.

- 5) Local sentiment does not appear to favor the designation of additional Wilderness areas in the preserve. Some residents of Anuktuvuk Pass fear that Wilderness designation will lead to eventual restrictions on subsistence hunting in the area. Residents of Coldfoot, Wiseman, and Nolan expressed their opposition to the Wilderness proposal at NPS' Wilderness public meeting on June 8, 1988, in Coldfoot.

YUKON-CHARLEY RIVERS NATIONAL PRESERVE

(See State of Alaska comments dated May 27, 1988.)

RECOMMENDATION:

The state requests that the Charley River corridor (one half mile on either side of the river) be excluded from the Wilderness recommendation.

RATIONALE:

- 1) The state asserts that the Charley River is navigable. Designation of the corridor as Wilderness could increase the potential for conflicts between the NPS and state regarding state management of the river.
- 2) The Charley River is a National Wild and Scenic River. This designation provides adequate protection of federal interests in the river corridor.

RECOMMENDATION:

The state requests that the the proposed Circle Hot Springs to Eagle road corridor and one half mile on either side of the proposed alignment be excluded from Wilderness designation.

RATIONALE:

Development of a road from Circle Hot Springs to Eagle has been discussed for years. The Alaska Department of Transportation and Public Facilities recently completed a reconnaissance study on the route. If this area were designated as Wilderness, it would be more difficult to receive approval for any future road development, as Congress must approve Title XI applications for projects within Wilderness areas.

The state notes that it will be continuing to review the Yukon-Charley Rivers recommendation based on information currently being requested from the NPS. Following this review, the state may have additional comments on this proposal.

BERING LAND BRIDGE NATIONAL PRESERVE

(See State of Alaska comments dated May 27, 1988.)

RECOMMENDATION:

The state requests that the Imuruk Lake and lands within one half mile of the lake be excluded from the Wilderness recommendation.

RATIONALE:

- 1) Options for future development in this area would be restricted if designated Wilderness. Possible developments include visitor facilities, docks, campgrounds, trails, research structures, and cabins. The EISs, in fact, list several "reasonably foreseeable" developments which would be precluded by Wilderness designation, including a dock at Imuruk Lake, a permanent air/water quality monitoring station, a permanent research structure, a five-site campground, 30 miles of trail, an interpretive sign, and a permanent reindeer herders, cabin. While it may be premature to decide to develop these facilities, the state believes that these options should not be precluded.
- 2) The state asserts that Imuruk Lake is navigable, and therefore holds title to the submerged lands. Wilderness designation of uplands surrounding the lake could increase the potential for conflicts between the NPS and state regarding state management of the lake.

ANIAKCHAK NATIONAL MONUMENT AND PRESERVE

(See State of Alaska comments dated August 12, 1988.)

RECOMMENDATION:

The state requests that the portion of the Wilderness recommendation adjacent to the possible RS 2477 right-of-way from Kujulik Bay to the headwaters of Lava Creek be deleted.

RATIONALE:

While development of this possible RS 2477 right-of-way is not envisioned, the state wishes to preserve maximum flexibility to improve this corridor if needed in the future. A Wilderness designation would not automatically preclude such development, but would undoubtedly make the process more difficult. Wilderness designation would also further complicate management of potential user conflicts.

RECOMMENDATION:

The NPS may wish to modify its proposed Wilderness boundary in the vicinity of state lands to protect Wilderness values from the possible impacts of adjacent development.

RATIONALE:

Wilderness values could be affected by oil and gas development occurring on state lands to the northwest of the unit. No oil and gas lease sales are currently scheduled or anticipated, but the long-term possibility of such activities should be considered by NPS.

LAKE CLARK NATIONAL PARK AND PRESERVE

(See State of Alaska comments dated July 18, 1988.)

RECOMMENDATION:

The state supports adoption of the Proposed Action (Alternative 1), which does not recommend any additional land for Wilderness designation.

RATIONALE:

- 1) Approximately 65 percent of Lake Clark National Park and Preserve (or 2.6 of 4 million acres) is already in Wilderness status.
- 2) Several areas of the park which the NPS identified as suitable for Wilderness designation have complex land ownership patterns. In particular, the Cook Inlet coast between Redoubt Bay and Chinitna Bay includes extensive non-federal interests. Wilderness designation in this area would not be appropriate.
- 3) Wilderness designation could limit the NPS' ability to respond to the increasing level of visitation expected in Lake Clark. The EIS, on page 42, estimates that recreational visits will increase from 22,000 (1987 level) to 133,000 by the year 2020. Wilderness designation would restrict development of visitor facilities (e.g., campgrounds, trails, and public use cabins) and other uses and activities. The EIS, on page 47, describes several effects Wilderness designation can have over the long-term, including effects on "road locations and mileage, landing sites, extent and location of facilities, and degree of controls applied to activities such as mining, vehicle use, open and closed areas of use, and physical developments." The state believes NPS should maintain management flexibility in these areas.

NOTE: This page was inadvertently left off the attachment to State of Alaska comments on the NPS final EISs for the thirteen Alaskan park units, dated November 14, 1988.

KOBUK VALLEY NATIONAL PARK

(See State of Alaska comments dated August 29, 1988.)

RECOMMENDATION:

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

RATIONALE:

- 1) Wilderness designation of the Salmon River drainage would increase the difficulty involved in gaining federal approval for a potential access route from the Red Dog port facility to the Ambler mining district. Given the scope of the Ambler district mineral deposits and the likelihood that they will be developed, the state can not support adoption of a land use designation which could complicate development of the access route.
- 2) Residents of northwest Alaska do not appear to favor designation of additional Wilderness lands. At the public meeting the NPS held on July 29, 1988, in Kotzebue, representatives of the Northwest Arctic Borough, Maniilaq Association, and NANA Regional Corporation spoke against additional Wilderness. In addition, many local residents expressed concern at the public meeting on July 28, 1988, in Kiana about the effects of Wilderness designation on their traditional lifestyles.
- 3) The state is concerned that, over time, public pressures could lead NPS to manage traditional subsistence, recreational and commercial uses in designated Wilderness areas more stringently than is currently envisioned by the NPS or described in the EIS. We are concerned that rural Alaskans who use the park will see rights and opportunities accorded to them under ANILCA (e.g., use of snowmobiles, motorboats, and airplanes) eroded as the NPS responds to pressures from other park users and national constituencies.
- 4) Wilderness management of lands adjacent to the Kobuk River could be complicated by the presence of 13 Native allotments and extensive motorized traffic along the Kobuk River. The state does not believe Wilderness designation would be appropriate in this highly used area.

MAR 2 1989

RECEIVED MAR 2 2/27/89
1989

To: Senate Finance Committee

Subject: Written testimony regarding
S.J.R. - 22 (Relating to federal wilderness areas in Alaska).

I believe the increase of federal wilderness area land in the State of Alaska is necessary, acceptable, and does protect the interests of the residents of Alaska and of the citizens of the United States.

I am a twenty year resident of Alaska and feel S.J.R. - 22 is very inappropriate, and does not support my view.
Please include my testimony in the record.

Thankyou, Jim Miller

JIM MILLER

16335 GOLDENVIEW DR.

ANCHORAGE, ALASKA

99516

- written testimony -

SUR

22

HOUSE COMMITTEE REPORT

(11)

Date Referred: April 26, 1989

FURTHER REFERRALS:

Date of Committee Action: 5/6/89

The FINANCE Committee considered:

SJR 25

SENATE JOINT RESOLUTION NO. 25

[RESURRECTION CREEK ROAD UPGRADE]

Requesting the U.S. Forest Service to upgrade Resurrection Creek Road in the Chugach National Forest.

RECOMMENDATIONS:

- [] be replaced with _____ [] the same title
- [] have attached amendment(s) [] a new title
- [] do pass
- [] do not pass
- [] no recommendation
- [] individual recommendations
- [] additional referral to the _____ Committee

ADOPTS: _____ letter of intent

ATTACHES NEW FISCAL NOTE(S):
(Dept)

APPROVES PREVIOUS: (Date/Dept)

- [] fiscal impact _____
- [] zero fiscal note _____
- [] zero with analysis _____

- [] fiscal note(s) _____
- [] zero fiscal note(s) _____
- [] zero fn/analysis DOTPF 4/5/89

SIGNING DO PASS:

SIGNING:

(Check approp. column)

Do Not
Pass No Rec Amend

Ray Wallis Wallis
Tom Hoff Hoffman
Donald Larson Larson
Cliff Swackhammer Swackhammer
Tay Brown Brown
Koponen Koponen
Ulmer Ulmer
Barnes Barnes
Shultz Shultz
Phillips Phillips
Rieger Rieger

co- Donald Larson
 Chairman's Signature
 co- Tom Hoff

STATE OF ALASKA
1989 LEGISLATIVE SESSION

BILL VERSION: SJR 25
PUBLISH DATE: 4/5/89

FISCAL NOTE

Revision Date:
Title: Upgrade Resurrection Creek Road

Agency Affected: DOT&PF
BRU: Central Region

Sponsor: Kertula and Szymanski
Requestor:

Components:

EXPENDITURES/REVENUES: (THOUSANDS OF DOLLARS)

OPERATING	FY 88	FY 89	FY 90	FY 91	FY 92	FY 93
PERSONAL SERVICES	0	0	0	0	0	0
TRAVEL	0	0	0	0	0	0
CONTRACTURAL	0	0	0	0	0	0
SUPPLIES	0	0	0	0	0	0
EQUIPMENT	0	0	0	0	0	0
LAND & STRUCTURES	0	0	0	0	0	0
GRANTS, CLAIMS	0	0	0	0	0	0
MISCELLANEOUS	0	0	0	0	0	0
TOTAL OPERATING	0	0	0	0	0	0

CAPITAL	0	0	0	0	0	0
---------	---	---	---	---	---	---

REVENUE	0	0	0	0	0	0
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FUNDING: (THOUSANDS OF DOLLARS)

GENERAL FUND	0	0	0	0	0	0
FEDERAL FUNDS	0	0	0	0	0	0
OTHER*	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0

POSITIONS:

FULL-TIME	0	0	0	0	0	0
PART-TIME	0	0	0	0	0	0
TEMPORARY	0	0	0	0	0	0

ANALYSIS: (Attach a separate page if necessary)

See attached.

Prepared by: William R. Snell, Regional Director
Division: Central Region

Phone: 266-1440

Date:

Approved by Commissioner: Mark S. Hickey
Agency: Department of Transportation and Public Facilities

Date: 3/20/89

Distribution (by preparer):
Legislative Finance
Legislative Sponsor
Requestor
Office of Management and Budget
Impacted Agency(ies)

Fiscal Note Analysis
SJE 25

ASSUMPTIONS

The Resurrection Creek Road is not a State owned right-of-way. DOT&PF provide incidental maintenance of the road between the Hope Road and the Hope Airpor in order to ensure access to the airport, especially during the winter months. The lands surrounding this section of Resurrection Creek Road have been selected by the Kenai Borough as part of the Borough's entitlement under Alaska Statehood Act. The remaining lands in this area are in private or federal ownership. In light of these facts, we assume that improvement of the road by the U.S. Forest Service or the Kenai Borough will have no impact on the State's operating budget.

PROGRAM SUMMARY

1. Positions: None required.
2. Other Expenditures: None required.
3. Funding: Not applicable.
4. Section Cost Analysis: Not applicable.

COMPUTATIONS

Not applicable.

ECONOMIC IMPACT

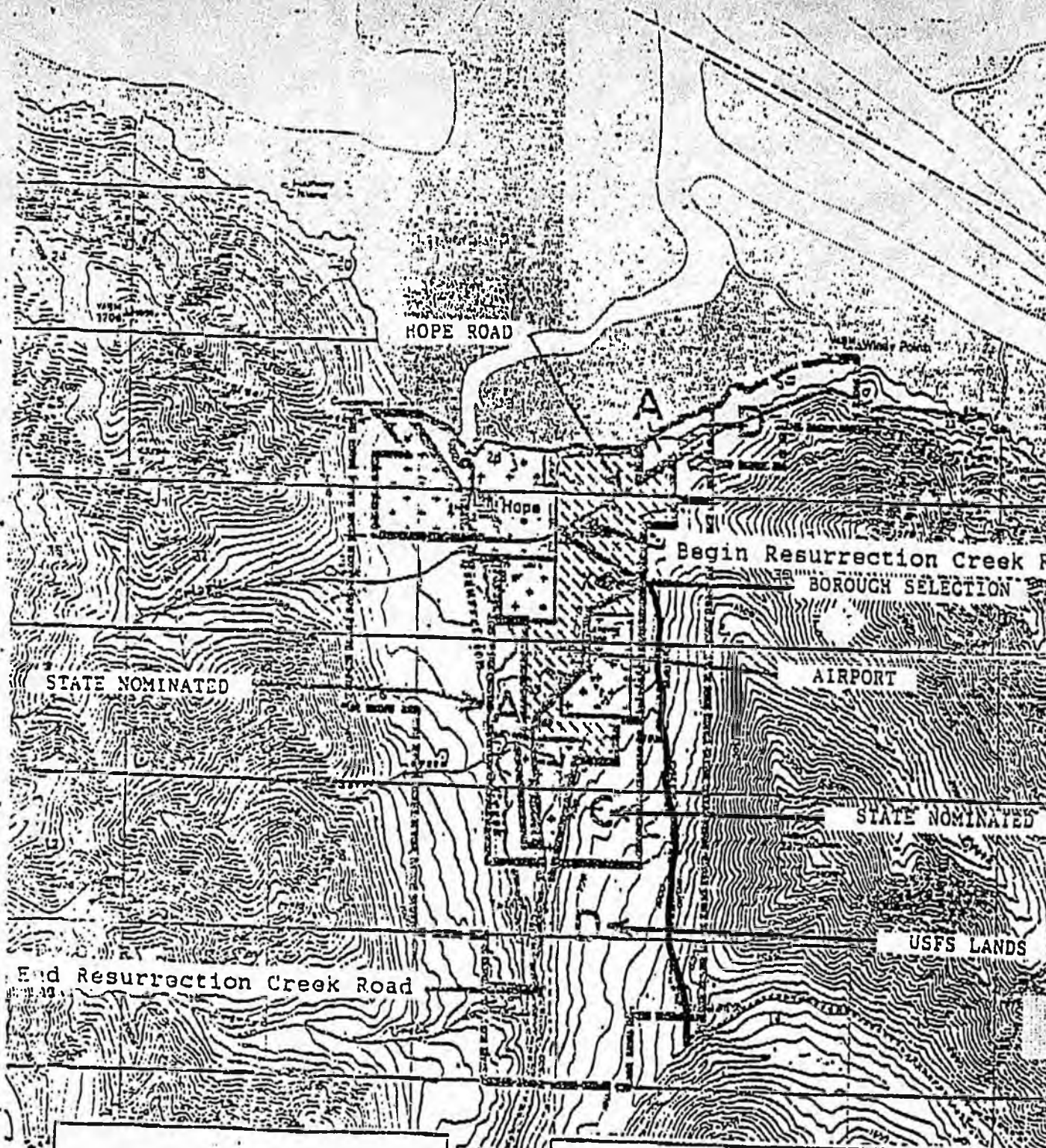
None.

IMPACT ON LOCAL GOVERNMENT






It is likely that the Kenai Borough will become responsible for maintaining those portions of the road passing through their entitlement lands once these lands are conveyed.

ATTACHMENTS

1. Map showing the road and adjacent lands.




LEGEND

-  State owned
-  Existing state selection
-  Private (including Native owned)
-  Boundary of selection
-  Boundary of area not recommended for selection

0 3 6 miles

scale 1:63,360



NFCG NOMINATION FOR SELECTION

HOPE ADDITIONS
740 Acres

SEWARD D-7, D-8
T.9 & 10N., R.2W., S.M.

Chugach National Forest

1 IN THE SENATE

BY KERTTULA AND SZYMANSKI

2

SENATE JOINT RESOLUTION NO. 25

3

IN THE LEGISLATURE OF THE STATE OF ALASKA

4

SIXTEENTH LEGISLATURE - FIRST SESSION

5

Requesting the U.S. Forest Service to

6

upgrade Resurrection Creek Road in the

7

Chugach National Forest.

8

BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF ALASKA:

9

WHEREAS the Resurrection Creek Road provides access to the trailhead

10

of the Resurrection Pass Trail; and

11

WHEREAS the Resurrection Pass Trail traverses the Chugach National

12

Forest between Hope and Cooper Landing and is maintained by the United

13

States Forest Service; and

14

WHEREAS the Resurrection Creek Road is receiving ever increasing

15

volumes of traffic due to increased use of the Resurrection Pass Trail by

16

tourists and recreationists; and

17

WHEREAS the last portion of the Resurrection Creek Road is passable by

18

only one lane of traffic; and

19

WHEREAS the increased use of the Resurrection Creek Road by tourists

20

and recreational users has generated a need to upgrade portions of the road

21

to meet appropriate engineering and safety standards;

22

BE IT RESOLVED by the Alaska State Legislature that the United States

23

Forest Service is respectfully requested to upgrade that portion of Resur-

24

rection Creek Road that provides access to the Resurrection Pass Trail; and

25

be it

26

FURTHER RESOLVED that the Alaska State Legislature supports the ef-

27

forts of the Alaska delegation in Congress to obtain funds for the United

28

States Forest Service budget for upgrading the Resurrection Creek Road.

29

COPIES of this resolution shall be sent to the Honorable Dan Quayle,

1 Vice-President of the United States and President of the U.S. Senate; to
2 the Honorable Clayton Yeutter, Secretary of Agriculture; to the Honorable
3 F. Dale Robertson, Chief of the U.S. Forest Service; to the Honorable Jim
4 Wright, Speaker of the U.S. House of Representatives; to the Honorable
5 Robert C. Byrd, Chairman of the Subcommittee on Interior and Related Agen-
6 cies of the U.S. Senate Committee on Appropriations; to the Honorable
7 Sydney R. Yates, Chairman of the Subcommittee on Interior and Related
8 Agencies of the U.S. House of Representatives Committee on Appropriations;
9 and to the Honorable Ted Stevens and the Honorable Frank Murkowski, U.S.
10 Senators, and the Honorable Don Young, U.S. Representative, members of the
11 Alaska delegation in Congress.

6/881

February 2, 1988

Mr. Dalton Dulac
Forest Supervisor
Chugach National Forest
201 E. 9th Ave, Suite 206
Anchorage, Ak. 99501

Dear Sir,

This letter concerns a proposed upgrading of the Resurrection Creek Road in Hope, Alaska.

The Hope/Sunrise Advisory Planning Commission was appointed by the mayor of the Kenai Peninsula Borough to advise the borough on land related matters in the Hope and Sunrise area. The KPB currently contracts the maintenance of a large portion of the Resurrection Road. The southern portion is Forest Service land and is not maintained. We have been asked to comment on upgrading this road even though much of the road lies outside KPB selected areas.

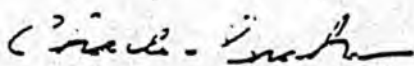
At our meeting of January 6, 1988, we adopted the following resolution:

- (1) that the southern portion of the Resurrection Road, as staked by the USFS in the summer of 1987, be upgraded as staked. This area lies between the Resurrection Valley trailhead (station 69+00) and the Hope Mining Company cabins at the top of the hill (station 33+00). We recommend that the upgrading be limited to this area. We request that this work be expedited.
- (2) that consideration of any further upgrading of the Resurrection Road be included in the current USFS planning process.
- (3) that an inviolable ROW (right-of-way) be secured before further upgrading.
- (4) that historical aspects of the area such as the old tailing piles be recognized, and
- (5) that the question of road maintenance be considered.

This matter was discussed by the community at a town meeting on January 30, 1988, and a resolution was passed recommending an upgrading of the area as described above.

Much appreciation for your interest.

Sincerely,



Charles Graham, Chairman
Hope/Sunrise Advisory Planning Commission
POBox 11
Hope, Ak. 99605

T. 10 N., R. 2 W.

Sec. 27, SW4, and that portion of the SW4SE4
lying south of the Hope Highway;

Sec. 33, E2SE4; and

Sec. 34, W2, NW4NE4;

excluding from the lands herein tentatively
approved U.S. Survey Nos. 1093 (HES 72),
2636 (HES 247) and 4881.

Containing approximately 283 acres.

Aggregating approximately 445.99 acres.

Excepting and reserving to the United States a right-of-way
thereon for ditches or canals constructed by the authority of the
United States under the Act of August 30, 1890 (26 Stat. 391,
43 U.S.C. 945).

The grant is subject to the reservations, limitations, and
conditions of Title VI of the Civil Rights Act of 1964
(78 Stat. 241), and the requirements of the regulations of the
Secretary of the Interior, as modified or amended (43 CFR 17).

This document confirms that all right, title, and interest of the
United States in and to the lands described above is deemed to
have vested in the State of Alaska pursuant to Sec. 906(d)(1) and
(2) of the Alaska National Interest Lands Conservation Act of
December 2, 1980 (94 Stat. 2371).

Elaine O. Wilde

Acting Chief, Branch of State
Adjudication

Introduced by: Skogstad
Date: December 15, 1987
Action: Adopted
Vote: Unanimous

KENAI PENINSULA BOROUGH

RESOLUTION 87-121

SUPPORTING THE ALASKA CONGRESSIONAL DELEGATION EFFORTS TO OBTAIN NECESSARY FUNDS FOR THE UPGRADING OF RESURRECTION CREEK ROAD IN HOPE, ALASKA

WHEREAS, ~~the~~ Resurrection Creek Road is receiving larger volumes of traffic yearly to the trailhead of Resurrection Trail; and

WHEREAS, the last portion of Resurrection Creek Road is passible by one lane traffic only; and

WHEREAS, due to the increase in tourism a need exists to upgrade the necessary portions of Resurrection Creek Road to insure suitable safety standards;

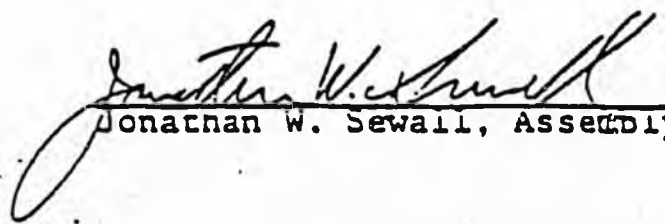
NOW THEREFORE, BE IT RESOLVED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH:

Section 1. That the Kenai Peninsula Borough Assembly supports all efforts by the Alaska Congressional Delegation to obtain the funds necessary into the Dept. of Agriculture's budget for the upgrading of a portion of Resurrection Creek Road.

Section 2. That this resolution be sent to Senators Ted Stevens and Frank Murkowski, Representative Don Young, Senator Robert Bird, Chairman of the Senate Appropriations Committee, Subcommittee on the Interior and related agencies and Representative Sydney Yates, Chairman of the House Appropriations Committee, Subcommittee on the Interior and related agencies.

ADOPTED BY THE ASSEMBLY OF THE KENAI PENINSULA BOROUGH ON THIS 15th DAY OF December, 1987.

ATTEST:


Jonathan W. Sewall, Assembly President


Borough Clerk

Date: January 30, 1988
Action: Unanimous Do Pass

Resolution of Hope Inc./ Hope Village Council

Supporting the upgrading of a portion of Ressurrection Road

Whereas, the portion of Ressurrection Road running South from the Hope Mining Company cabins has been in need of upgrade for many years; and

Whereas, with a minimum of improvements the safety of this portion of Ressurrection Road would greatly increase;

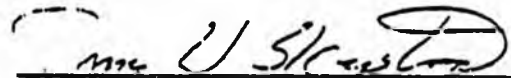
NOW THEREFORE, BE IT RESOVED BY THE HOPEINC./HOPE VILLAGE COUNCIL:

Section 1. That the community of Hope hereby endorses and supports adequate funding to upgrade a portion of Ressurrection Road beginning at Hope Mining Company and ending at the trailhead for Ressurrection Trail.

Section 2. The work endorsed in this resolution should follow the Chugach National Forest Service report titled FDR902.

Section 3. That this resolution takes effect immediately upon adoption.

Adopted by members of Hope Inc./Hope village Council on January 30, 1988.


James W. Skogstad/ President Hope Inc.

P. O. Box 109
Hope, Alaska 99605
October 23, 1987

Chugach Forest Supervisor
Anchorage, Alaska

Dear Sirs:

As a resident I'm writing to express support of the upgrading of Resurrection Creek Road in Hope, Alaska.

The road is in sad shape. It needs more than a grader smoothing it over now and then. Like a cut that won't heal it needs some skin over it. We are wasting time and money trying to maintain a road that needs the once over. In the long run it is cost effective to resurface Resurrection Creek Road.

Local residents as well as visitors will benefit with less wear and tear on cars, less road maintenance expense, and a safer journey.

Sincerely,



Dru E. Walker
Hope Gold

P.O. Box 85
Hope, AK. 99605
October 26, 1987

Re: Resurrection Creek
Road

Chugach Forest Supervisor
Anchorage Alaska

Dear Sir,

I would like to be on record as supporting improved maintenance of the Resurrection Creek Road, Hope Alaska. Currently this road begins as a 24ft. top, changing to a 12 ft. top at mile 3, and finally a 9 ft. top at mile 4 of the 4.5 mile road. This road was built by bulldozer upon native soil or mining spoils and accross soft areas with corduroy.

This road is subject to heavy summer traffic as the only route to a public recreational mining area and to the trail head for the popular Resurrection Trail. With increased summer traffic, many times vehicles must back up when meeting other vehicles. The dust is often so thick that headlights must be on.

These inadequacies are more than an inconvenience but instead pose a safety hazard that must be corrected immediately.

Sincerely,

John Sorenson P.E.

FÜRST SUPERVISOR,

DEAR SIR,

I HAVE JUST RECEIVED
IN THE AMISHA. I HAVE EXPRESSED
A DESIRE TO MY DAUGHTER-IN-LAW,
SHE HAS LIVED IN HERE, FOR THE PAST
YEARS, THAT I WOULD LIKE TO BE
TAKEN FOR A RIDE, UP THE
RESERVATION ROAD AND SHE
WAS VERY NICE THAT SHE CONSIDERS
THE ROAD IS TOO DANGEROUS.

Yours truly,
W. J. ...

NOV 11, 1987

FOREST SUPERVISOR

Resurrection creek
road is not fit
for mules
David Wheel

1000 5 01
Steve Simmons
P.O. Box 30
Hope, AK. 99605

To Whom it may Concern...

Dear Sirs,

I would like to bring to Someones' Attention
the condition of Resurrection Creek road
in hope ALASKA.

the road is in very poor condition!
the potholes and washouts are to Extreme
Proportions. the road is very Hazardous
and needs much work to bring it to
a safe standard.

I would appreciate someone taking
some action to get Resurrection Creek
road upgraded/improved and or rebuilt

Thank you

Steve Simmons

October 18, 1987

Supervisor
Chugach National Forest

Dear Sir:

This letter is in regard to the poor condition of Resurrection Creek Road near Slope, Alaska.

My two daughters and I live on this road and daily travel is becoming increasingly difficult. The road is full of "dick holes", has water running across the surface in several places and because there isn't any gravel on the road it's slick & muddy now. It's impossible to go more than 15-20 m.p.h. without getting the vehicle and passengers "shook up".

Hundreds of cars drove Resurrection Rd. this last summer going to the parking lot where Resurrection Pass Trailhead starts and to Faystake - a replica of an old mining town. Most of the cars were from out of state. Many made comments to, and other residents in Slope about the appalling condition of Resurrection Road.

Several people stopped at my house
inquiring as to how the rest of the
road was. (I live about three miles
on Resurrection from Hope Rd.)

It seems that funds should be
available to grade and gravel Resurrectio.
Creek Road. Especially with the increase
of popularity that Resurrection Pass
Trail is gaining and, also, Fairbanks.

Thank-you

Sincerely,

Marcin DeBuck

Box 66

Hope, AK 99605

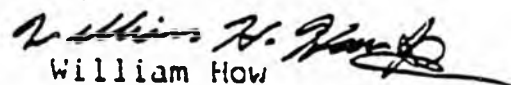
Chugach National Forest
Dalton Du Lac
Forest Supervisor

Dear Sir:

I have lived in Hope, Alaska since 1980. I drive the Resurrection Creek Road many times and I feel the road does not meet public safety standards. The road is very bumpy, nasty road.

I would appreciate if you would upgrading this road very soon.

Sincerely Yours.


William How

Date: Feb 8, 1988

Forest Supervisor
Chugach National Forest

Dear Sir,

I have lived in Hope for
5 years. During this period
I have driven Resurrection
Road numerous times, both
for business and personal
reasons. This road is B+D.
There are pot holes and
"ponds" year round. There
are many places where
culverts are needed. This
road is unsafe, and causes
thousands of dollars in
damage to many vehicles.
The people in Hope would
appreciate anything that
can be done.

Sincerely, Derjick Morgan
and Morgan

Box 114 Hope 99605

Ray Mc Cormiskey
POB 142
HOPE, AK 99605

Forest Supervisor
Chugach National Forest
Dear Sir

I would like to see Resurrection Road improved. The road is too narrow in several places. There are countless potholes, rocks and standing water.

This summer & fall has cost me over \$1,000.00 in repairs due to the condition of the road.

Getting the road condition corrected would save residents & tourist dollars that could be used for better things. Ray Mc Cormiskey

Dear Sir,

People who have travelled on Resurrection Creek Rd. have complained quite a bit about the road conditions.

Working at Discovery Cafe when people ask about the Resurrection Creek Rd. since they want to go to Paydreck I tell them that the road condition is very bad & that going there ~~is~~ in their cars wouldn't be too good.

Improving the road will be greatly appreciated by everyone.

Thank you,

Katy Matye

NOVEMBER 10, 1987

FOREST SERVICE SUPERVISOR

DEAR SIR;

THE RESURRECTION CREEK
ROAD IS TOTALLY UNSAFE FOR
VEHICLE TRAFFIC. IT IS A LONG
DITCH THAT IS FULL OF POTHOLES,
BLIND CURVES, VERY NARROW
PASSAGE. THE ROAD CREATES
ALOT OF VEHICLE REPAIR PROBLEMS.
I WOULD APPRECIATE ANY
MAJOR UPGRADING.

SINCERELY YOURS
DAVID BROWN

USFS Supervisor: Edward R. Cole
Chugach NF: P.O. Box 62
Hope, Ak 99605
Nov. 10, 1987

Dear Sirs:

I have lived in Hope for the past eight years (since 1979) and have a log house near the Hope airstrip about 1 1/2 miles up Resurrection Creek Road.

The road has deteriorated over the years and, except for very rare grading, no maintenance has been done. The road is badly pitted with potholes year round and becomes quite muddy in spring, requiring 4 wheel drive to travel.

Because of the severe jolting & vibration the rear axle was broken, rear door hatch catch

has had to be replaced, and steering column broken on my truck which was brand new. When I came to Hope I'm sure that the rough road conditions are accelerating the wear & tear on it.

lately driving over 10 mph has been risky. Since 1979 population and travel on Resurrection Creek Road has multiplied many fold. Four households lived on the road in 1979-80 Now close to 18 households are occupied year round. During this time no material has been added to the road bed. I strongly urge funding improvement of this road before it becomes worse.

Sincerely,
Ed Cole

Forest Supervisor
Chugach National Forest

Dear Sirs:

I am a resident
of Hope and travel
Resurrection Creek Road
frequently.

This road is in
need of much necessary
repairs. The potholes
just keep getting worse
and multiplying. The
road in the spring is
impassable except with
a 4 wheel drive because
it gets so muddy and
torn up. There are
places where it is so
narrow that two cars
cannot pass each other.

Many families live up
Resurrection Creek Road
and have problems
getting to their homes.
Vehicles are being torn
up from traveling the
road. Many of the repairs
are expensive, and depending
on the cost people have
to leave their vehicles sitting
until they can afford to
repair them. So the road
causes many hardships,
since people in our
community have to carry
their water.

I don't feel that it
is unreasonable to ask
that this repairs be made.
It is not only hard on
the vehicles of the people
in our community, but
also the hikers and
weekend miners that

Forest Supervisor

use the road. It is not uncommon to have a tourist looking for someone to repair a tire after they have traveled the road.

In the winter many people have to change their plans and not go up the trail because parts of the road glaciate over and make it either hazardous or just too much of an inconvenience to continue up the road. This is a problem that the families are facing every year.

Anything that can be done to repair this road and make it

more safe and reliable.
It needs to be widened
in places and have the
potholes fixed, with more
top grade gravel put
where it gets so muddy
and impassable. After
this is done we ask that
it be maintained so
that we don't have these
problems in the future.

Thank you

Debra Logan
P.O. Box 93
Hope, AK 99605

Dear Sirs.

I have been living
up Resurrection Rd. for 3 1/2
years. And I feel that the
amount of activity on
the road that it could
use a great improvement.
Not only would I personally
like to see the road improved,
but see our towns thrive on
tourist business. The road
discourages alot of people

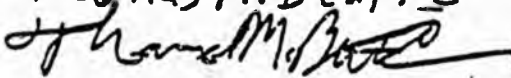
Joe Kruszal
General Delivery
Hope Alaska

11-1-87

To The
Forest Supervisor
Chugach National Forest

Please fix the Resurrection
creek Road for it is the
"Pit". This Road is badly
in need of Repair.

I Drive this Road for Business
and pleasure. Also this
Road does not meet Public
Safety standards according
to your own reports
The People of Hope would
appreciate anything that
can be done.

Sincerely
Thomas M. Beattie


Discovery Gate
Hope, Alaska
10-29-87

FOREST SUPERVISOR
CHUGACH NATIONAL FOREST

DEAR SIR;

ENOUGH TRAVELERS HAVE STOP HERE
AND ASKED ME ABOUT THE CONDITION OF THE
RESURRECTION ROAD TO THE TRAIL HEAD.

SOME DID COMPLAIN ABOUT THE STATE IT
WAS DURING DIFFERENT TIME OF THE YEAR.

I NOTICED SOME UP GRADING HAS BEEN
DONE RECENTLY, BUT MORE SHOULD BE DONE
TO THE ROAD TO MEET SAFETY NEEDS.

ESPECIALLY THAT SECTION AFTER THE LOG
CABIN ON THE HOPE MINING COMPANY.

Sincerely,

J. Kagimoto

SUR

27

HOUSE COMMITTEE REPORT

(11)

Date Referred: March 23, 1989

FURTHER REFERRALS:

Date of Committee Action: 4/7/89

The FINANCE Committee considered:

SJR 27

SENATE JOINT RESOLUTION NO. 27

[VALDEZ ESSENTIAL AIR SERVICE SUBSIDY]

Relating to an essential air service subsidy for the City of Valdez.

RECOMMENDATIONS:

- be replaced with _____ the same title
- have attached amendment(s) a new title
- do pass
- do not pass
- no recommendation
- individual recommendations
- additional referral to the _____ Committee

ADOPTS: _____ letter of intent

ATTACHES NEW FISCAL NOTE(S):
(Dept)

APPROVES PREVIOUS:

(Date/Dept)

- fiscal impact _____
- zero fiscal note _____
- zero with analysis _____

- fiscal note(s) _____
- zero fiscal note(s) _____
- zero fn/analysis DOTPF 3/8/89

SIGNING DO PASS:

Hoffman _____
 Larson _____
 Brown _____
 Koponen _____
 Ulmer _____
 Barnes _____
 Shultz _____
 Rieger _____
 Wallis _____

SIGNING:
(Check approp. column)

Do Not Pass
 No Rec
 Amend

Signature	Do Not Pass	No Rec	Amend
<u>Phillips</u>		<input checked="" type="checkbox"/>	

co- Chairman's Signature
 co- _____

1 IN THE SENATE

BY KERTTULA AND SZYMANSKI

2

SENATE JOINT RESOLUTION NO. 27

3

IN THE LEGISLATURE OF THE STATE OF ALASKA

4

SIXTEENTH LEGISLATURE - FIRST SESSION

5

Relating to an essential air service

6

subsidy for the City of Valdez.

7

BE IT RESOLVED BY THE LEGISLATURE OF THE STATE OF ALASKA:

8

WHEREAS the City of Valdez is a community with a population of 3,700

9

persons and is about 300 road miles and 150 air miles from Anchorage, the

10

nearest urban area; and

11

WHEREAS the current level of scheduled air service to the City of

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Valdez adversely affects the safety and comfort of the residents of the

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city and prevents quick access to Valdez in the event of an emergency

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involving the Trans-Alaska Pipeline System oil terminal; and

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WHEREAS the City of Valdez is unable to further develop its tourist

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industry and to fully utilize its civic center facilities without adequate

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scheduled air transportation services; and

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WHEREAS Valdez is subjected to inclement weather during much of the

19

year, with a high proportion of overcast and rainy days during the summer

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and overcast and snowy days during the winter; and

21

WHEREAS the only aircraft that can provide the City of Valdez with

22

reliable scheduled air service is the DeHavilland DASH-7, which is a four

23

engine aircraft with short take off and landing capabilities and is

24

equipped with microwave equipment that is compatible with the microwave

25

landing system at the Valdez airport; and

26

WHEREAS the DeHavilland DASH-7 aircraft can operate during periods of

27

inclement weather that are frequent in Valdez and has in the past provided

28

Valdez with a scheduled flight success rate of 90 percent; and

29

WHEREAS at least two commercial air carriers have expressed interest

PAS III

ALASKAN POINTS CURRENTLY RECEIVING 419 SUBSIDIZED SERVICE

NIKOLSKI (UMNAK ISLAND) ALEUTIAN AIR, LTD. \$39,570

CORDOVA }
GUSTAVUS }
PETERSBURG } ALASKA AIRLINES, INC. \$1,414,021
WRANGELL }
YAKUTAT }

BOSWELL BAY }
CAPE YAKATAGA } CHITINA AIR SERVICE \$103,386
ICY BAY }

CHISANA }
CENTRAL } 40 MILE AIR, LTD. \$55,466
CIRCLE }

CAPE NEWENHAM }
CAPE ROMANZOF } FRIENDSHIP AIR ALASKA, INC. \$83,141
NYAC }

SAND POINT }
PORT HEIDEN }
PERRYVILLE }
IVANOFF BAY } REEVE ALEUTIAN AIRWAYS, INC \$1,241,985
KING COVE }
FALSE PASS }

ATKA }
ST. GEORGE }
AKHIOK }
AMOOK BAY }
KARLUK }
KITOI BAY }
LARSEN BAY }
LAZY BAY/ALITAK }
MOSER BAY }
OLD HARBOR }
OLGA BAY }
OUZINKIE }
PARKS/UYAK } PENINSULA AIRWAYS, INC. \$700,215
PORT BAILEY }
PORT LIONS }
PORT WILLIAMS }
SAN JUAN/UGANIK }
SEAL BAY }
TERROR BAY }
WEST POINT/VILLAGE ISLE }
ZACHAR BAY }

MAY CREEK }
MCCARTHY } SPORTSMAN FLYING SERVICE \$18,705

SEWARD HARBOR AIR \$53,331

45

\$3,709,820

ALASKAN ESSENTIAL AIR SERVICE POINTS

<u>E.A.S. Point</u>	<u>Service Hub</u>	<u>Miles</u>	<u>E.A.S. Point</u>	<u>Service Hub</u>	<u>Miles</u>
Adak Island	ANC	1192	Deering	OTZ	5
Akhiok	ADQ	84	Dutch Harbor	ANC	79
Akiachak	BET	16	Eagle	FAI	19
Akiak	BET	22	Eek	BET	4
Akutan	CDB	143	• Egegik	AKN	4
Alakanuk	KSM	61	• Ekuk	DLG	1
Aleknagik	DLG	17	Ekwok	DLG	4
→ Allakaket	BTT	40	Elfin Cove	JNU	6
Ambler	OTZ	130	Elim	OME	5
• Amook Bay	ADQ	54	Excursion Inlet	JNU	5
Anaktuvuk Pass	BTT	85	False Pass	CDB	5
→ Aniak	ANC	318	• Farewell	MCG	6
Angoon	JNU	59	• Flat	MCG	8
Annette/Metlakatla	KTN	22	→ Fort Yukon	FAI	14
→ Anvik	ANI	77	Funter Bay	JNU	1
• Arctic Village	FYU	108	→ Galena	ANC	31
Atka Island	ADK	106	Gambell	FAI	20
Atmoutluak	BET	16	Golovin	OME	19
Barrow	FAI	503	Goodnews Bay	OME	1
Barter Island/Kaktovik	FAI	386	→ Grayling	BET	1
→ Beaver	SCC	115	Gulkana	ANI	1
Bethel	FAI	108	Gustavus	ANC	10
→ Bettles	ANC	399	Haines	JNU	1
→ Birch Creek	FAI	179	Hawk Inlet	JNU	1
• Boswell Bay	FYU	27	→ Holy Cross	ANI	1
Brevig Mission	CDV	24	Homer	ANC	1
Buckland	OME	64	Hoonah	JNU	1
• Candle	OTZ	75	Hooper Bay	DEF	1
• Cape Lisburne	OTZ	140	→ Hughes	GAL	1
• Cape Newenham	OTZ	165	→ Huslia	GAL	1
• Cape Romanzof	BET	148	Hydaburg	KTN	1
• Cape Yakataga	BET	156	Icy Bay	CDB	1
Central	CDB	106	• Igiugig	AKN	1
→ Chalkyitsik	FAI	104	Iliamna	ANC	1
Chatham	FYU	41	Ivanoff Bay	PTH	1
• Chernofski	JNU	60	Kake	PSG	1
Chevak	DUT	54	→ Kalskag	ANI	1
Chicken	BET	136	→ Kaltag	GAL	1
Chefornak	TOK	62	Karluk	ADQ	1
Chignik	BET	90	Kenai	ANC	1
Chignik Lake	PTH	46	Ketchikan	SEA	6
Chignik Lagoon	PTH	46	Kiana	OTZ	1
• Chisana	PTH	45	King Cove	KVC	1
Circle	TOK	90	Kipnuk	BET	1
Clark's Point	FAI	248	Kitoi Bay	ADQ	1
Cold Bay	DLG	14	Kivalina	OTZ	1
Cordova	ANC	621	Klawock	KTN	1
Council	ANC	160	Kobuk	OTZ	1
Craig	OME	58	• Koliganek	DLG	1
→ Crooked Creek	KTN	59	Kotlik	SKM	1
	ANI	51			

<u>E.A.S. Point</u>	<u>Service Hub</u>	<u>Miles</u>	<u>E.A.S. Point</u>	<u>Service Hub</u>	<u>Mile</u>
Koyuk	OME	130	St. George	CDB	283
→ Koyukuk	GAL	25	→ St. Mary's	ANC	442
Kwethluk	BET	13	St. Michael	UNK	47
• Kwigillingok	BET	80	St. Paul Island	ANC	767
• Kwiguk/Fmmonak	KSM	63	Sand Point	ANC	557
• Lake Minchumina	FAI	148	San Juan/Uganik	ADQ	32
• Larsen Bay	ADQ	58	Savoonga	OME	162
• Lazy Bay/Alitak	ADQ	89	Scammon Bay	BET	145
Levelock	AKN	31	Selawik	OTZ	74
• Manley Hot Springs	FAI	83	Seward	ANC	74
→ Marshall/Fortuna Ledge	BET	75	→ Shageluk	ANI	7
• May Creek	GKN	104	Shaktoolik	UNK	31
• McCarthy	GKN	97	Sheldon Point	SKM	5
→ McGrath	MCG	221	Shemya	ANC	145
Mekoryuk	BET	154	Shishmaref	OME	12
• Minto	FAI	39	Shungnak	OTZ	14
• Moser Bay	ADQ	64	Sitka	JNU	9
→ Mountain Villagw	KSM	14	Skagway	JNU	8
Naknek	AKN	14	• Skwentna	ANC	6
Napakia	BET	11	→ Sleetmute	ANI	7
Napaskiak	BET	6	South Naknek	AKN	1
New Stuyahok	DLG	50	Stebbins	UNK	5
Newtok	BET	96	→ Stevens Village	FAI	9
Noatak	OTZ	48	→ Stony River	ANI	9
Noorvik	OTZ	43	→ Takotna	MCG	1
→ Nulato	GAL	34	→ Tanana	FAI	12
• Nunapitchuk	BET	23	• Tatalina	MCG	1
• NYAC	ANI	44	Teller	OME	5
• Old Harbor	ADQ	49	Tenakee Springs	JNU	5
• Olga Bay	ADQ	77	Terror Bay	ADQ	2
Ouzinkie	ADQ	11	Tin City	OME	10
Parks	ADQ	57	Togiak	DLG	6
Pelican City	JNU	67	Toksook	BET	11
Perryville	PTH	75	→ Tuluksak	BET	3
Petersburg	JNU	123	Tuntatuliak	BET	4
	KTN	112	Tununak	BET	11
Pilot Point	AKN	84	• Twin Hills	DLG	6
→ Pilot Station	KSM	16	Ugashik	AKN	2
Platinum	BET	123	• Umnak Island/Nikolski	DUT	11
Point Hope	OTZ	150	Unalakleet	ANC	35
• Point Lay	BRW	180	Utopia	GAL	12
• Porcupine Creek	BTT	40	Valdez	ANC	12
Portage Creek	DLG	30	• Venetie	FYU	2
Port Bailey	ADQ	24	Wainwright	BRW	8
Port Heiden	ANC	424	Wales	OME	10
Port Lions	ADQ	16	West Point	ADQ	1
Port Williams	ADQ	47	White Mountain	OME	6
Prudhoe Bay/Deadhorse	ANC	627	Wrangell	KTN	8
• Queen	DLG	12		JNU	11
Quinhagak	BET	71	Yakatat	ANC	3
→ Rampart	FAI	82		JNU	1
• Red Devil	ANI	73	Zachar Bay	ADQ	
→ Ruby	GAL	44	Kongiganak	BET	
→ Russian Mission	BET	71	Manokotak	DLG	
Tatitlek			Seal Bay	ADQ	
• Umiat			Port Alexander		
			Portage Creek		

ESSENTIAL AIR SERVICE

Essential Air Service (EAS) is a U.S. Department of Transportation (U.S. DOT) program for subsidizing air service to generally smaller communities which would not otherwise receive scheduled air service. The U.S. DOT, under this program, makes payments to air carriers to provide EAS to communities determined by the U.S. DOT, using criteria mandated by statute, to be eligible for this service. Generally, carriers, unless they are subsidized, would not provide scheduled air service to certain EAS communities because these communities do not generate sufficient numbers of passengers at fares that cover carrier costs. The U.S. DOT authorizes subsidy for a carrier to provide EAS only when no carrier is willing or able to provide the required level of service without subsidy support.

In 1978, when the Airline Deregulation Act (ADA) took effect, 746 communities in the United States and its territories were listed on air carrier certificates issued under Section 401, Federal Aviation Act. Prior to deregulation, most of these communities were assured a minimum level of air service. In light of the ADA's provisions allowing air carriers to terminate service without prior Government approval, there was concern that communities that generated low traffic levels would lose service as carriers withdrew to larger, more lucrative markets. To address this concern, as part of the ADA the Congress added Section 419 to the Federal Aviation Act, which ensured that these communities would continue to receive EAS for ten years, with Federal subsidy if needed.

Under this program, U.S. DOT determines the minimum level of EAS that these communities require. U.S. DOT will provide subsidy to an air carrier, if necessary, to assure that this minimum level of service is provided. Of the approximately 208 communities for which EAS determinations have been issued in Alaska, 41 communities receive service that is supported by an EAS subsidy.

The ten year service period designated by the Airline Deregulation Act of 1978 was scheduled to terminate on October 24, 1988. However, Congressional interest in ensuring continued service to these communities remained strong, and prior to the expiration date, legislation was enacted (attached) expanding the EAS program and extending it for ten additional years.

In the 1987 legislation, which became effective October 1, 1988, Congress provided for a continuation of EAS guarantees, termed "Basic EAS". Under Basic EAS, any point was to be provided ten more years of basic service if it was (1) eligible for service under the earlier program, (2) actually receiving service during any part of Fiscal Year 1988, and (3) situated at least 45 miles from the nearest "hub" airport -- now defined as an airport enplaning annually at least 0.25% of all enplanements in the United States. Certain other service upgrades were also mandated, such as general employment of aircraft having at least 15 passenger seats, and use of pressurized aircraft if the flight normally flies higher than 8,000 feet above sea level. For Alaska however, the 1987 Act contains language which allows for the use of smaller aircraft to provide service, provided that the community agrees in writing with the U.S. DOT.

The 1987 legislation also established two forms of service enhancement, by which communities could receive more service than basic EAS by (1) agreeing to a subsidy-sharing commitment or by (2) risking loss of basic service if U.S. DOT-funded enhanced service failed to meet agreed levels of passenger usage. The new legislation also provided that any community not entitled to Basic EAS might agree with U.S. DOT on a reasonable service level and receive service as a "new point" on a subsidy-sharing basis.

Under the new Act, each EAS point currently receiving service must be re-evaluated to determine the adequacy of both service and subsidy. At this point, only a handful of Alaskan EAS points have been addressed and it appears that it may be six months until all

points have been re-evaluated.... Until that time, service and subsidies as stipulated under the current agreement between the carrier and U.S. DOT will continue.

Proposed rulemakings to implement the 1987 legislation i.e. subsidy-sharing, are currently under development and are not available at this time. The U.S. DOT Alaska Field Office personnel are not certain when additional information on the implementation of the Act will be available. However, they continue to maintain an open line of communication with the DOT&PF regarding any new developments on both the implementation of the new Act and the status of the FY89 appropriation shortfall.

CORRECTION

**THIS DOCUMENT
HAS BEEN REPHOTOGRAPHED
TO ASSURE LEGIBILITY**

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