



**COMMENT ANALYSIS REPORT
COOK INLET BELUGA WHALE
PROPOSED RULEMAKING
CRITICAL HABITAT DESIGNATION**

May 2010

**Prepared by
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ACRONYMS AND ABBREVIATIONS

CAR	Comment Analysis Report
CFR	Code of Federal Regulations
ESA	Endangered Species Act
NMFS	National Marine Fisheries Service
SOC	Statement of Concern
USFWS	United States Fish and Wildlife Service

1.0 INTRODUCTION

The National Marine Fisheries Service (NMFS) published a proposed rulemaking to designate critical habitat for Cook Inlet beluga whale (*Delphinapterus leucas*) distinct population segment in the *Federal Register* on December 2, 2009 (50 Code of Federal Regulations [CFR] part 226) (NMFS 2009). The notice outlined that NMFS proposed to designate two areas in Cook Inlet, Alaska as critical habitat for the endangered Cook Inlet beluga whale (beluga whale) under the Endangered Species Act (ESA) and solicited comments regarding the proposed rulemaking. The initial public comment period was 60 days and concluded on February 1, 2010. Following several requests to extend the public comment period, NMFS moved the deadline to submit comments to March 3, 2010 making the comment period 90 days in total.

During the public comment period four public hearings were held in Alaska to solicit public testimony on the proposed rulemaking. The public hearings were held in Soldotna on February 3, 2010, Homer on February 4, 2010, Wasilla on February 11, 2010, and Anchorage on February 12, 2010. A total of 87 people provided testimony at the hearings including local, state and federal government officials; public councils; environmental groups; commercial organizations; Native organizations; and members of the general public.

NMFS received 135,463 individual submissions (including public testimony during the four hearings) in response to the proposed rule. This comment analysis report (CAR) provides an analytical summary of these submissions. It presents the methodology used by NMFS in reviewing, sorting, and synthesizing substantive comments within each submission into common themes. As described in the following sections of this report, a careful and deliberate approach has been undertaken to ensure that all substantive public comments were captured and can be documented through assignment of a specific submission and comment assignment tracking codes.

2.0 THE ROLE OF PUBLIC COMMENT

The Endangered Species Act (ESA) of 1973 was signed into effect on December 28, 1973 to “provide for the conservation of endangered and threatened species of fish, wildlife, and plants, and for other purposes.” The responsibility for carrying out the ESA is shared between the United States Fish and Wildlife Service (USFWS) and NMFS. NMFS may initiate a status review under the ESA if a petition is made to list a species as threatened or endangered, reclassify a species, or designate the critical habitat of a species. When a status review of a species indicates that a listing is warranted, a proposed rule must be issued by NMFS in the *Federal Register* within one year of the petition to announce the intention to implement the listing. Comments are then solicited from the public and public hearings may be held.

In regards to the listing of a species as endangered or the designation of critical habitat, Sec. 4(a)(5) of the Endangered Species Act of 1973 states:

(5) With respect to any regulation proposed by the Secretary to implement a determination, designation, or revision referred to in subsection (a)(1) or (3), the Secretary shall— (A) not less than 90 days before the effective date of the regulation— (i) publish a general notice and the complete text of the proposed regulation in the Federal Register, and (ii) give actual notice of the proposed regulation (including the complete text of the regulation) to the State agency in each State in which the species is believed to occur, and to each county or equivalent jurisdiction in which the species is believed to occur, and invite the comment of such agency, and each such jurisdiction, thereon; (B) insofar as practical, and in cooperation with the Secretary of State, give notice of the proposed regulation to each foreign nation in which the species is believed to occur or whose citizens harvest the species on the high seas, and invite the comment of such nation thereon; (C) give notice of the proposed regulation to such professional scientific organizations as

he deems appropriate; (D) publish a summary of the proposed regulation in a newspaper of general circulation in each area of the United States in which the species is believed to occur; and (E) promptly hold one public hearing on the proposed regulation if any person files a request for such a hearing within 45 days after the date of publication of general notice. (16 U.S.C. 1533)

This framework establishes the need for public comment in the listing process. Once the public comment period is concluded, NMFS considers all comments received as well as any new information that may have emerged in that time.

3.0 ANALYSIS OF PUBLIC SUBMISSIONS

Public comment on the proposed rule were submitted in three formats: hardcopy submissions, public testimony, and electronic submissions at Regulations.gov. All submissions on the proposed rule were read, reviewed and logged into a database where they were assigned an automatic tracking number (Submission ID). Submissions were reviewed for specific substantive comments (herein referred to as ‘comments’), which were then recorded into the database and given a unique Comment ID (with reference to the original Submission ID) for tracking and synthesis. Substantive comments were then coded into seven issue categories that were developed for coding during the first step of the analysis process (see Table 1).

The coding phase was used to divide each submission into a series of ‘comments’, each having a unique Comment ID number. The goal of this process was to ensure that each sentence and paragraph in a submission containing a substantive comment pertinent to the proposed rule was entered into the database. Substantive content constituted statements, suggested actions, data, background information or clarifications relating to the critical habitat designation for beluga whales.

Once substantive comments were coded, a second review of the comments within each issue category was conducted to identify specific concerns within those categories. These were synthesized into succinct “statements of concern” (SOC’s) that are intended to capture the general issues raised in comments with similar themes. SOC’s are frequently supported by additional text to further explain the concern, or alternatively to capture the specific comment variations within that grouping. SOC’s are not intended to replace actual comments. Rather, they summarize for the reader the range of comments on a specific topic. Each category of comments may have more than one SOC. For example, there are 28 SOC’s under the issue category Impacts for Consideration (IMP 1, IMP 2, IMP 3, etc.). Each comment was assigned to one SOC. The complete list of SOC’s can be found at Section 7.

TABLE 1: ISSUE CATEGORIES

Issue Category	Symbol	Overview
Impacts for Consideration	IMP	Includes comments on the economic impacts, impacts on national security, and other relevant impacts of designating critical habitat that need to be considered by NMFS.
Exclusion from Critical Habitat	EXC	Includes comments on areas and activities that should be excluded from the critical habitat designation.
Extinction	EXT	Includes comments on the whether the exclusion of an area as critical habitat will result in the extinction of the Cook Inlet beluga whale.
Primary Constituent Elements (of Critical Habitat)	PCE	Includes comments on the primary constituent elements (physical or biological features that are essential to the conservation of the Cook Inlet beluga whale and which may require special management considerations or protection).
Inclusion in Critical Habitat	INC	Includes comments on areas that should be included in the critical habitat designation.
Regulatory Process and Legal Issues	REG	Includes comments about the regulatory process and legal issues for the designation of critical habitat. This category includes comments on NMFS' designation process including the economic analysis, supporting science, and existing regulations.
Acknowledged	ACK	Applies to submissions in which comments were determined not to be substantive and warranted only a comment acknowledged response.

4.0 FORMAT OF SUBMISSIONS

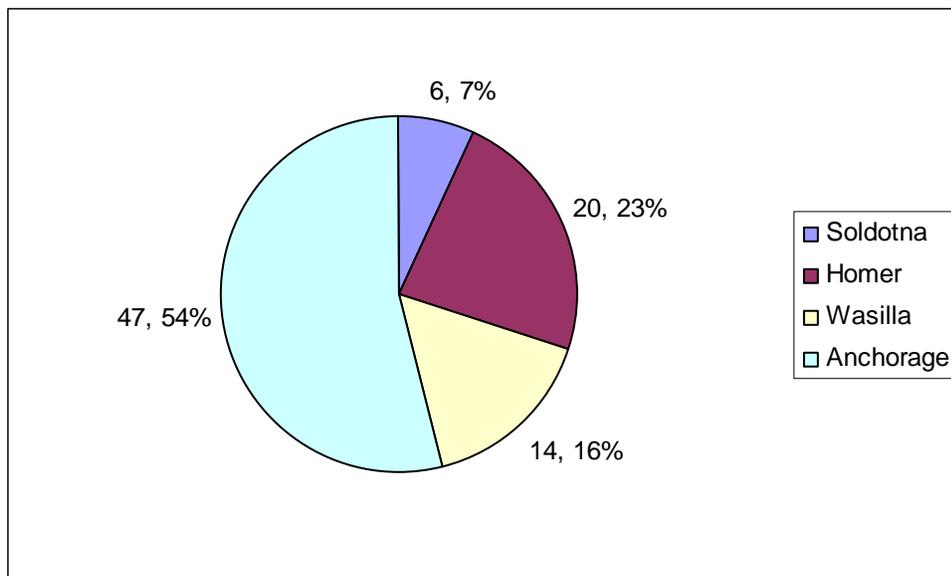
NMFS received a total of 135,463 submissions in response to the proposed rule. The majority of submissions (99.63 percent) were submitted electronically through the [Regulations.gov](http://www.regulations.gov) website (Table 2). Other submissions were submitted by hard copy such as letters, faxes and post cards (415, 0.31 percent), and in testimonies at public hearings (87, 0.06 percent).

TABLE 2: FORMAT OF SUBMISSIONS RECEIVED

Format	Number	Percentage
Hard Copy (letter, postcard, fax)	415	0.31%
Public Testimony	87	0.06%
Regulations.gov	134961	99.63%

Testimonies were recorded at public hearings that were held in Soldotna on February 3, 2010, Homer on February 4, 2010, Wasilla on February 11, 2010, and Anchorage on February 12, 2010. A total of 87 people gave testimony at the public hearings including from local, state and federal government officials; public councils; environmental groups; commercial organizations; Native organizations; and the general public. The largest numbers of testimonies were given at the Anchorage public hearing, 47, comprising 54 percent of the total public testimonies (Figure 1). There were 20 testimonies given at the Homer public hearing (23 percent of total testimonies), 14 at the Wasilla public hearing (16 percent of total testimonies), and six at the Soldotna public hearing (7 percent of total testimonials).

FIGURE 1: TESTIMONY AT PUBLIC HEARINGS



5.0 CATEGORY OF SUBMISSIONS

Submissions were grouped into two separate categories: 1) ‘Form letter submissions’ that contained standardized text, the majority of which were generated by non-governmental environmental organizations; and ‘unique submissions’ in which the content was distinct. The majority (99.62 percent) of submissions received were form letter submissions as shown in Table 3.

TABLE 3: SUBMISSIONS BY CATEGORY

Submissions Category	Number of Comments
Form Letter Submissions	134,959
Unique Submissions	504

5.1 Form Letter Submissions

There were 13 different form letter submissions received from 10 different organizations and two from unknown sources. Organizations that submitted form letters were the Center for Biological Diversity, Cook Inlet Keeper, Defenders of Wildlife, EEIS Consulting Engineers, National Audubon Society, Natural Resource Defense Council, The North Star Terminal and Stevedore Co. (submitted two different

form letters), and the Sierra Club. The remaining two form letters were from unknown sources, and took the form of a letter and a postcard.

Table 4 shows the number and percentage of form letter submissions from each organization. The largest number of form letters were submitted by the Sierra Club, 46,403 comprising 34.38 percent of the form letters received. The second and third largest number of form letters submitted were from the Natural Resource Defense Council, 39,955 (29.61 percent) and the Center for Biological Diversity, 27,478 (20.36 percent).

TABLE 4: FORM LETTER SUBMISSIONS BY ORGANIZATION

Form Letter	Number of Submissions	Percentage of Form Submissions
Care 2	7615	5.64%
Center for Biological Diversity	27,478	20.36%
Cook Inlet Keeper	13	0.01%
Defenders of Wildlife	9,712	7.20%
EEIS Consulting Engineers	12	0.01%
National Audubon Society	38	0.03%
Natural Resource Defense Council	39,955	29.61%
North Star Terminal & Stevedore Co. 1	12	0.01%
North Star Terminal & Stevedore Co. 2	3	0.00%
Ocean River Institute	3458	2.56%
Sierra Club	46,403	34.38%
Letter Unknown Source	16	0.01%
Postcard Unknown Source	244	0.18%

5.1.1 Coding Form Letter Submissions

For the purpose of coding comments, form letter submissions from each organization were grouped and coded collectively. In other words, the comments in the 46,403 Sierra Club were analyzed and counted as one submission. The SOC's that address each of the form letter comments are shown in Table 5.

TABLE 5: FORM LETTER SUBMISSION SOC'S

Form Letter	SOC's
Care 2	REG 3
Center for Biological Diversity	INC 1, REG 2
Cook Inlet Keeper	IMP 7, INC 3, INC 19, INC 20, REG 3
Defenders of Wildlife	REG 3
EEIS Consulting Engineers	IMP 2, REG 1, REG 12
National Audobon Society	IMP 7, REG 3
Natural Resource Defense Council	IMP 7
North Star Terminal & Stevedore Co. 1	EXC 3, IMP 8, REG 10, REG 12, REG 13
North Star Terminal & Stevedore Co. 2	EXC 10, IMP 14, IMP 24, IMP 8, REG 12
Ocean River Institute	IMP 6, IMP 15, IMP 22,
Sierra Club	IMP 22, IMP 27
Letter Unknown Source	IMP 15, IMP 8
Postcard Unknown Source	INC 3

5.2 Unique Submissions

There were a total of 504 unique submissions received. Of these, 158 were from organizations and 346 from individuals. In some instances, organizations or individuals re-sent submissions from the comment period on the advanced notice of proposed rulemaking to designate critical habitat for Cook Inlet beluga whales. These were not coded as they are incorporated by reference in the CAR for the advanced notice published in June 2009.

Table 6 lists the organizations from which unique submissions were received. Note that ConocoPhillips and Resource Development Council also submitted independent economic analyses.

TABLE 6: UNIQUE SUBMISSIONS FROM ORGANIZATIONS

Organization	Number of Submissions
Air Liquide America LP	1
Alaska Big Village Network	1
Alaska Center for the Environment	1
Alaska Department of Fish and Game	1
Alaska Earth Sciences	1
Alaska Health Quest	1
Alaska Maritime Agencies	1
Alaska Miners Association	1
Alaska Natural Gas Transportation Projects	1
Alaska North Pacific Shipping	1
Alaska Oil and Gas Association	1
Alaska Railroad Corporation	1
Alaska SeaLife Center	1
Alaska State Chamber of Commerce	3
Alaska State Legislature, House District 35	1
Alaska State Legislature, House of Representatives	1
Alaska State Legislature, Legislative Affairs Agency	1
Alaska Support Industry Alliance	1
Alaska Survival	1
Amak Towing Company, Inc.	1
Anchorage Chamber of Commerce	2
Anchorage Water and Wastewater Utility	2
Audubon Alaska	2
Bowman's Bearcreek Lodge	2
Center for Biological Diversity	1
Center for Water Advocacy	2
CGGVeritas Land (US) Inc.	1
Chugach Electric Association, Inc.	1
Citizens' Advisory Commission on Federal Areas	2
City of Houston	1
City of Kenai	1
ConocoPhillips Alaska, Inc. ¹	1
Conservative Patriots Group	5
Cook Inlet Fishermen's Fund	1
Cook Inlet Keeper	1
Cook Inlet Marine Mammal Council	3
Cook Inlet Region, Inc.	1
Cook Inlet Tug & Barge Co	2
Crowley Marine Services	1
EcoDelMar.org	1
Energy API	1
Escopeta Oil Company	1
Export Council of Alaska	2

Organization	Number of Submissions
Four All Direction Foundation	1
Friends of the Anchorage Coastal Wildlife Refuge	2
Gimarc Consulting	1
Horizon Lines	1
J&S Services, Inc.	1
Judy Patrick Photography	1
Kachemak Bay Conservation Society	3
Kenai Peninsula Borough	1
Kenai Peninsula Borough Clerk's Office	1
Kenai Peninsula Fishermen's Association	2
Kenaitze Indian Tribe	1
Knik Arm Bridge and Toll Authority	2
Knik River Watershed Group	1
Law Office of Dane E. Johnson, LLC	1
MAP Consulting, LLC	2
Marathon Oil Company	1
Marine Mammal Commission	1
Matanuska-Susitna Borough	2
MatSu Business Alliance	2
Millrock Exploration Corp.	1
Municipality of Anchorage	5
National Humane Education Society	1
National Ocean Industries Association	1
Native Village of Eklutna	1
Native Village of Tyonek	1
Natural Resource Defense Council	1
New York Whale and Dolphin Action League	1
North Gulf Oceanic Society	1
Ocean Renewable Power Company Alaska, LLC	1
Ocean River Institute	1
Old Town Kenai	1
PacRIM Coal, LP	2
Personal Watercraft Club of Alaska	1
Port of Anchorage	3
Renewable Energy Alaska Project	1
Resource Development Council for Alaska, Inc. ¹	4
Seater & Company	1
Seldovia Village Tribe	1
Senator Mark Begich's Office	2
Silver Salmon Creek Lodge	1
Snug Harbor	1
State of Alaska	1
STEELFAB	1
Stellar Oil & Gas, LLC.	1
Survey Point Holdings Incorporated	1
Tacoma-Pierce County Chamber	1
Temsco Helicopters Inc.	1

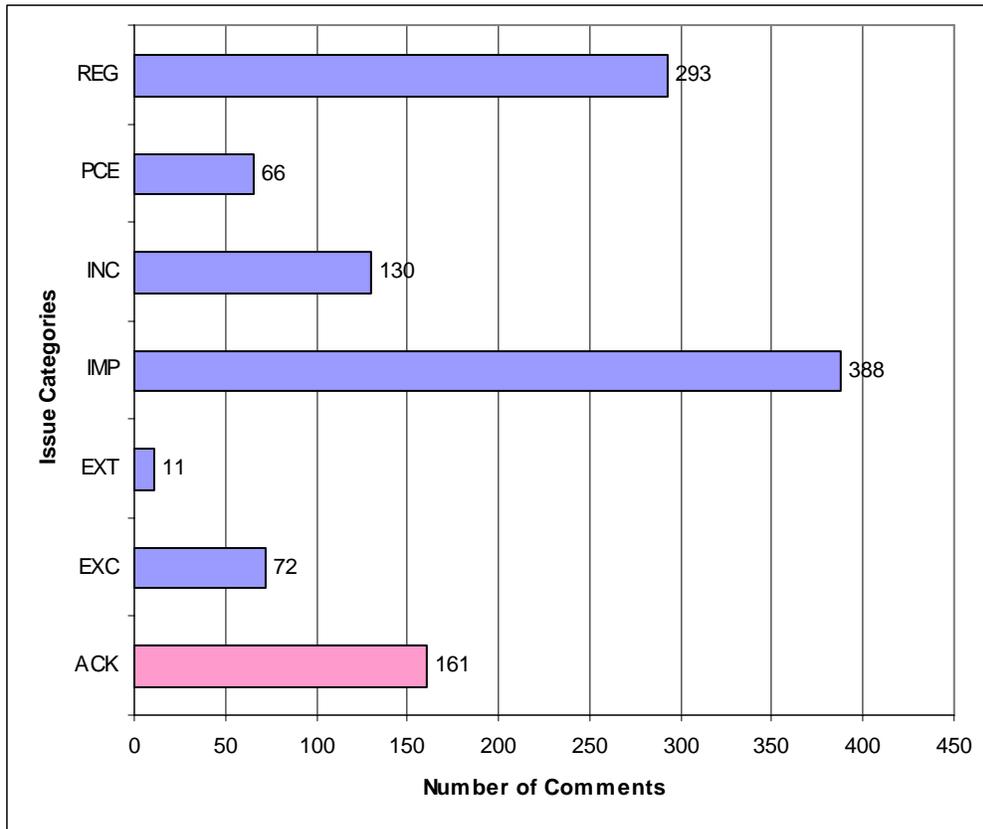
Organization	Number of Submissions
The Humane Society of the United States	1
The Laughlin Company, LLC.	1
The Odom Corporation	1
The Pebble Partnership	1
The Trust Land Office	1
Totem Ocean Trailer Express, Inc.	7
Transportation Institute	2
Trustees for Alaska: Includes a joint submission (Submission No. 756) from Defenders of Wildlife, North Gulf Oceanic Society, Alaska Community Action on Toxins, Center for Water Advocacy, and the Sierra Club Alaska Chapter.	2
Turnagain Arm Conservation League	2
Turnagain Arm Tidal Energy Corp.	1
Tyonek Native Corporation	2
United Cook Inlet Drift Association	2
United State Coast Guard	1
United States Air Force, Elmendorf Air Force Base	2
United States Air Force, Western Regional Environmental Office	3
United States Navy	1
United States Senate	1
Virginia Commonwealth University	1
Whale Watching Alaska	1

¹ Submission includes an independent economic analysis.

6.0 COMMENT ANALYSIS

A total of 1121 comments were coded from the unique and form letter submissions (keeping in mind that all form letter submissions from an organization were coded as one submission). Figure 2 shows the number of comments under each issue category. The issue category IMP contained the largest number of coded comments at 388. The top three issue categories following IMP were REG (293), and INC (130), and EXC (72). As mentioned in Table 1, ACK is a code that applies to submissions in which comments were determined not to be substantive and warranted only a comment acknowledged response. Figure 2 shows that there were 161 submissions that were coded as ACK.

FIGURE 2: COMMENTS IN ISSUE CATEGORIES



7.0 STATEMENTS OF CONCERN

This section presents the SOC's developed for each issue category which summarize substantive comments received. To assist in finding which comments were contained in each submission, a submission index (Appendix A) was created. The submission index lists all unique submissions received. Appendix A contains three tables. Table 1 presents the unique submissions received from organizations presented alphabetically by name of the organization, and Table 2 presents the unique submissions received by individuals presented alphabetically by the last name of the individual. Both of these tables also present the Submission ID(s), and the SOC's which were assigned to their specific comments. Table 3 lists each SOC in the first column and the organizations and individuals to which these can be attributed in the second column.

To find which comments are contained in a submission, search for the submission of interest in Appendix A, note which SOC codes are listed under the submissions, and then read the text next to that SOC in Section 7.

Impacts for Consideration (IMP): Includes comments on the economic impacts, impacts on national security, and other relevant impacts of designating critical habitat that need to be considered by NMFS.

-
- IMP 1 The Port of Anchorage is fundamental to the public welfare and economy of the state of Alaska. The critical habitat designation would have adverse impacts on the port, such as:
- Freight diverted to other ports, rail or highway would cause significant inefficiencies and increase carbon dioxide emissions from additional handling.
 - Existing and future operations of all transport companies bringing goods to and from the port would be hindered.
 - Additional costs of transporting goods would be born by Alaskan consumers, particularly rural Alaskans.
 - Expansion of the port is necessary for the future economic viability of the State and may be slowed or halted by the designation.
 - Plans for future operations by the cruise industry may be abandoned or diminished.
- IMP 2 The critical habitat designation in Cook Inlet would have a negative impact on human activities without providing any direct benefits to the beluga whales. These impacts include: litigation, increased permitting, increased mitigation measures, reduced development proposals, protracted process, unnecessary protection measures, new restrictions, costly delays
- IMP 3 The Port of Anchorage is one of 19 strategic seaports that serves as a strategic global military hub for the Alaska mission and national security/defense in general. Critical habitat designation would compromise national security because it would constrain:
- Movement of equipment and material through the Port to Alaska's five major military installations by train, truck or plane
 - Deployments, operations, and throughput for commodities into Alaska's installations; all wartime and peacetime deployments and equipment go through this port without exception
 - U.S. Flag Merchant Marines that provide vessels and logistical support
 - Its strategic seaport status by limiting its cargo staging areas and birthing

capacity

- The military's primary source of daily operating supplies including jet fuel from the valve yard and fuels tank
- The ability to berth deeper-draft Navy ships to the growing their presence in the Gulf of Alaska
- Entry to Alaska's remote ground maneuver and airspace training areas
- Operational cost increases would be passed onto the taxpayer
- Vessel movement, safety, and cause delays

IMP 4 Industry in and around Cook Inlet already complies with regulatory oversight and requirements and expensive mitigation in order to comply with the MMPA and ESA.

- The Port of Anchorage already has to comply with 25 requirements to protect beluga whales which add significant costs (\$5 million operating/\$10 million capital) to the expansion project. Officials are concerned about additional requirements.
- Knik Arm Crossing - It is estimated complying with noise regulations cost \$5 million/year for monitoring and construction shut-downs when belugas appear, plus twice the amount in contractor risk of shutting down.

IMP 5 The completion of Port projects is critical to shipping vessel operation and should not be stopped or delayed. The project in its current state does not have adequate berth due to siltage- dredging is already required 8 months of the year. Cargo discharge must be stopped during extreme low tides.

IMP 6 The critical habitat designation would benefit Cook Inlet local ecology, recreation, quality of life, resident retention, hunting, tourism, seafood value, subsistence fishing, commercial fishing, and sport fishing because it enables resources to remain viable for future generations. Further development of Cook Inlet would not benefit Alaskans because monies accrued would be lost in clean-up, spoiled environment, and loss of natural resources. NMFS analyses show that mitigation costs are relatively low compared to the benefits of a viable, healthy beluga whale population.

IMP 7 Critical habitat designation will not unduly restrict responsible development or human activities in Cook Inlet. Alaska has numerous species on the ESA list and none have stopped responsible development. Projects can and must accommodate critical habitat designation. An example would be the large Knik Arm Crossing project which can accommodate the needs of this endangered species.

IMP 8 The following existing and future projects, businesses, and organizations will be negatively impacted by the critical habitat designation while providing no clear benefit to the beluga whale:

- Citizens - Costs of commodities and utilities will increase
- Port of Anchorage - limit port expansion; ship traffic and operations (shipping industry); ongoing dredging
- Knik Arm Bridge - construction and use
- Oil and Gas Exploration and Development - New and replacement gas & oil pipelines and associated facilities; New off-shore drill platforms; Pipelines for distribution of fuel products, petrochemicals and CO₂ from coal liquefaction and gasification facilities; ANGDA spur pipeline to Cook Inlet; Enstar bullet pipeline
- Renewable energy projects - Turnagain Arm Tidal Energy Generation pilot

project near Fire Island, Mt. Spurr Geothermal project; Chakachamna Hydropower Plan

- Tourism - cruise industry
- Proposed Pebble Project - port facilities for shipping concentrates and receiving of equipment, supplies, fuel, etc.
- Major coal resources and other bulk commodity exports - including Chuitna Coal Project mine and port facilities; CIRI In-Situ coal gasification; PacRIM Beluga coal field (coal to liquids plant)
- Commercial and Sport fishing
- Utility upgrades (including AWWU) - increasing treatment would increase consumer costs
- New and replacement sewage facilities for all communities on Cook Inlet
- McKenzie Port, Alaska Railroad Intertie and the associated ship traffic
- Military base maintenance and expansion
- Commercial, private and military aircraft operations.
- Ports for shipping gravel from Tyonek, Anchorage, Point McKenzie, and the associated vessel traffic (North Forelands Dock and Industrial Area aggregate mining and export)
- Other Mat-Su Borough future marine development
- Cook Inlet Ferry ports and traffic between Anchorage, Point McKenzie, Ladd Landing, Tyonek, Nikiski, Kenai, Homer, Iniskin Bay, etc.
- City of Kenai River Bluffs Stabilization project (\$30mil erosion control project)
- Entire Municipality of Anchorage, Matanuska-Susitna Borough, and Kenai Peninsula Borough
- Shipping - any changes to safe and efficient operation of commercial vessels would be passed onto consumers and cause additional pollution
- Kenai Peninsula - already struggling- cannot lose jobs, investment, income and taxes
- The entire Railbelt because of its tie to Point MacKenzie
- Wastewater Treatment Plants - Anchorage, Kenai
- Commercial fish processing plants - Kenai
- Electricity - all derived from Cook Inlet natural gas
- Heating - Anchorage and Matsu homes

IMP 9 Natural gas is the local, affordable energy source for more than half the state's population. Additional offshore exploration is needed because of a pending gas supply crisis for Anchorage and the Valley. Exploration and development in Cook Inlet will suffer significant impacts:

- Loss of business activity (jobs and revenue) related to exploration (both seismic and drilling)
- Blackouts could be experienced while literally sitting on a known source of gas
- If offshore activities were restricted between April and November, which is the Ice free season, exploration (both seismic and drilling) would effectively be cancelled as these activities must be conducted during ice free conditions.
- Alaska will have to import natural gas instead of using local sources.
- We are approaching a natural gas supply crisis from Cook Inlet.

IMP 10 The negative impact created by this designation creates an anti-development stigma that

is contrary to the national energy policy to move towards energy independence and job creation. Alaska's ability to explore and develop its natural resources responsibly for the benefit of all Alaskans.

- IMP 11 Emerging renewable energy developers in Cook Inlet will be disproportionately disadvantaged by the creation of critical habitat because they are not as well financed.
- IMP 12 NMFS should evaluate the benefits of the habitat designation following its implementation.
- IMP 13 Beluga whale watching is important to both Alaskans and visitors. If these whales and their habitat are not protected, the tourism industry will suffer. We have already received negative publicity for failing to protect the polar bear and for aerial predator control.
- IMP 14 The beluga whale population was depleted from subsistence hunting and not from any development activity. Since the cause of their decline was already addressed, there is no need to designate critical habitat and restrict development in Cook Inlet.
- IMP 15 Current diminished population estimates and or range contraction of beluga whales may be the result of external factors such as shark and killer whale predation, increased water temperatures from global warming, loss of experienced adults, continued illegal harvest or migration out of Cook Inlet.
- IMP 16 The critical habitat designation will likely reduce the consumptive value of fishing in critical habitat areas (because fish stock will be eaten by belugas rather than contribute to sports, commercial, and subsistence fishing).
- IMP 17 Commercial, recreational, and subsistence fishing is disruptive to beluga whales because it may be lowering beluga prey densities. Nets, buoys, anchor lines, pulleys, and boats make it harder for belugas to navigate through the Inlet and increase their risk of collisions. Noise and oil pollution on land and water associated with fishing is also disruptive to belugas. More effort should be entertained to identify which fisheries impact anadromous stocks utilized by Cook Inlet beluga and alleviate pressure on these.
- IMP 18 Critical habitat Areas 1 and 2 intersect with exempted EEZ Fisheries.
- IMP 19 Primary constituent elements 1, 2, and 5 will have an adverse economic effect on set-net fishing. The economic analysis has not adequately assessed these impacts.
- IMP 20 Designating critical habitat for the beluga whale will help protect commercial, recreational, and subsistence fishing harvests of salmon, halibut, razor clams and other species.
- IMP 21 The critical habitat designation could increase shipping costs, delay delivery of cargo, effect water recreation, and create safety risks by any required speed reduction, restrictions to daylight hours of operation, delays in dredging operations at the port, marine mammal observer requirements, or other actions threatening operation. Having a consistent and reliable schedule for the arrival and departure of cargo will be difficult. Maritime infrastructure in Cook Inlet is very limited compared to other major ports yet the region is heavily dependent on maritime transportation and it needs every possible help rather than increased restrictions and regulations. A designation would be a serious

impediment to current and potential import/export opportunities. Any increased costs to ships, trucks, or trains would be passed on to consumers.

- IMP 22 Beluga whales are facing threats and possibly cumulative impacts from oil and gas exploration and development, mining, inadequate sewage treatment, runoff, fishing, increased shipping, urban expansion, climate change, glacial melt, invasive species, military activity, and past spills. Many proposed projects (Port of Anchorage expansion, Knik Arm Bridge, Port MacKenzie, Pebble Mine, Chuitna Coal Mine) will pollute Cook Inlet with toxic substances, create more vessel traffic, and increase habitat and noise disturbance. Designating critical habitat would require accountability for any actions that could affect belugas and is necessary for their recovery.
- IMP 23 Bank erosion and construction detritus in streams may be impacting belugas by limiting their prey.
- IMP 24 There is no evidence to indicate that oil and gas operations, current marine activities, or any development activity have impacted beluga whales or their habitat. Further exploration and development of Cook Inlet resources can occur without adversely affecting beluga whales.
- IMP 25 Responsible development and beluga whale protection can coexist. The critical habitat designation should not hamper responsible development.
- IMP 26 The critical habitat designation is not necessary as the beluga whale population has been steadily recovering (4 to 10 percent per year) in recent years due to environmental controls and subsistence hunting cessation.
- IMP 27 Subsistence harvesting is not the reason for the decline of the beluga whale population. There are other manmade causes that factor into the decline.
- IMP 28 Additional costs and uncertainty that would result from the critical habitat designation will discourage future investment in the affected areas.

Exclusion from Critical Habitat (EXC): Includes comments on areas and activities that should be excluded from the critical habitat designation.

- EXC 1 NMFS should reduce or exclude the entire Cook Inlet from critical habitat designation.
- EXC 2 NMFS should exclude the following activities based on economic reasons: Current and planned oil and gas activities; commercial, sport, personal use and subsistence fishing; current and proposed transportation projects including, but not limited, to the Port of Anchorage, shipping, roads and bridges, rail, and air; current and planned sanitation projects.
- EXC 3 As a result of a flawed economic analysis, NMFS failed to adequately consider the possibility of excluding certain activities from the proposed designation based on its true economic cost. The critical habitat designation should exclude areas where the benefits of exclusion outweigh the benefits of designation. These areas include those around structures and near areas of significant human activity, including projects that are currently proposed, and areas adjacent to CIRI lands.
- EXC 4 The areas proposed as critical habitat should be reconsidered to include only those areas that are essential to the recovery of the species and that actually contain primary constituent elements.
- EXC 5 There are specific areas around existing ConocoPhillips facilities that warrant exclusion from critical habitat designation based on economic impacts including the Beluga River Unit, Tyonek Platform and Kenai LNG Plant.
- EXC 6 The critical habitat designation should exclude the ports (deep-draft and barge docks) and future ferry sites of Cook Inlet (including Port of Anchorage, Port MacKenzie, and Tyonek) and vessel transit corridors into and out of Cook Inlet. Excluding these areas would ensure safe and effective shipping navigation, reduction in green house gases, jobs creation, and national security.
- EXC 7 The critical habitat designation should exclude the Port of Anchorage for reasons of national security.
- EXC 8 The decision to include the west and east side of the Cook Inlet is not supported by recent scientific data being compared to critical habitat needs versus economic needs.
- EXC 9 NMFS should consider excluding an economic/commercial corridor in the vicinity of the proposed Knik Arm Bridge, the Port of Anchorage, Port Mackenzie, and the nearby deep water shipping channel because of the potential detrimental economic impact.
- EXC 10 The critical habitat designation should be reduced to areas only in upper Cook Inlet where the beluga whales are most concentrated and should not include areas of historical use.
- EXC 11 The critical habitat designation should exclude the area near the City of Kenai to allow for needed capital projects.
- EXC 12 The critical habitat designation should exclude Kachemak Bay.

EXC 13 NMFS should exclude state special areas from the critical habitat designation. Because these areas were established by Alaska statute and the accompanying management plans were developed with a strong stakeholder process and full cooperation and involvement of local, state, and federal agencies, there is almost no risk that current protections will be diminished in the future. Areas which do not require “special management considerations or protections” are not “critical habitat” and are not to be designated as such under the ESA. 16 U.S.C. § 1532(5)(A). State special areas that should be excluded include:

- Kachemak Bay State Critical Habitat Area
- Fox River Flats State Critical Habitat Area
- Anchor River and Fritz Creek State Critical Habitat Area
- Clam Gulch State Critical Habitat Area
- Kalgin Island State Critical Habitat Area
- Redoubt Bay State Critical Habitat Area
- Trading Bay State Game Refuge
- Susitna Flats State Game Refuge
- Goose Bay State Game Refuge
- Palmer Hay Flats State Game Refuge
- Anchorage Coastal Wildlife Refuge
- McNeil River State Game Refuge
- McNeil River State Game Sanctuary.

EXC 14 The critical habitat boundary should be defined as the tidal boundary for Elmendorf AFB and Fort Richardson to avoid a potential overlap.

Extinction (EXT): Includes comments on the whether the exclusion of an area as critical habitat will result in the extinction of the Cook Inlet beluga whale.

- EXT 1 Cook Inlet beluga whales will become extinct if not protected from human activities.
- EXT 2 Species with designated critical habitat are more likely to recover.
- EXT 3 There must be protections put in place to prevent further losses in genetic diversity among the population of Cook Inlet beluga whales.
- EXT 4 Adding more regulations intended to protect Cook Inlet beluga whales will negatively impact the residents of Alaska and may elicit a backlash resulting in harm to or extinction of the species.
- EXT 5 The proposed habitat areas are irreplaceable and each provides a unique element necessary for the beluga whale's survival.
- EXT 6 NMFS may not exclude an area from designation if the exclusion will result in the extinction of the species. NMFS should adopt a precautionary approach by declining to exercise its discretion to exclude any proposed critical habitat.
- EXT 7 Limiting the designation to the species' current range would be inadequate to ensure the conservation of the species.

Primary Constituent Elements (PCE): Includes comments on the primary constituent elements (physical or biological features that are essential to the conservation of the Cook Inlet beluga whale and which may require special management considerations or protection).

- PCE 1 The presence of the primary constituent elements within the critical habitat designation is not uniform and NMFS should consider only those specific areas and times within these broader geographies that actually contain the primary constituent elements rather than the areas in their entirety as proposed.
- PCE 2 There is a lack of specificity in the primary constituent elements and what they actually mean such as the absence of toxins, the absence of in-water noise levels or the primary prey species. NMFS should provide further specificity of identified thresholds as part of the designation of the primary constituent elements.
- PCE 3 NMFS lacks the scientific information necessary to accurately designate all of the extensive areas proposed as critical habitat. More research is needed on the primary constituent elements of the belugas to accurately differentiate between critical habitat and general habitat.
- PCE 4 Without further clarification about the nature and function of the primary constituent elements the designation will be vulnerable to mischaracterization, erroneous application, and needless litigation.
- PCE 5 NMFS should provide a better description of the function of the designation in the ESA consultation process generally and specifically the role of the primary constituent elements as simple generic indicators of the important features of habitat of the species.
- PCE 6 Primary constituent element three needs to be amended to recognize that substances have toxic effects at different concentrations, depending on the type of substance, and that potential for harm to the beluga population is only relevant when the type and amount of a constituent are considered together. Furthermore, to properly gage the risk of toxic effects, the potential for exposure and uptake of toxins must be taken into account.
- PCE 7 The model used in primary constituent element one to predict a habitat preference for large expanses of mudflats and shallow tidelands northwest of Point Campbell and Woronzof, and southwest of Anchorage in lower Turnagain arm are not corroborated by beluga sightings reported by Goetz, et al. NMFS should revise this model by including all appropriate variables, particularly for fish stocks and physical properties.
- PCE 8 NMFS should revise the anthropogenic noise primary constituent element to properly reflect the bioacoustics literature as well as NMFS' own determinations that in-water noise must be maintained at levels that do not interfere with important life history functions and behavior of Cook Inlet beluga whales. Suggestions include:
- Reduce the noise levels permitted to 120 dB or lower.
 - Reduce the duration of allowable noise
 - Reduce the frequency that anthropomorphic noise-makers are permitted to perform.
- PCE 9 NMFS needs to clarify why existing regulations are not adequate to protect the primary constituent elements. Since it is clearly possible to protect beluga whale habitat in this

way, it is very difficult to see what need or benefit would be served by layering on an additional regulatory framework though the designation of critical habitat.

- PCE 10 The primary constituent elements are unnecessary because:
- The US Army Corps of Engineers already regulates discharge of materials below Mean Higher High Water under the Clean Water Act and this regulation should be sufficient to protect Cook Inlet beluga whales. (In reference to PCE 1)
 - NMFS has recorded blubber thickness of up to 18 cm (7.1 inches) in Cook Inlet beluga whales, or up to a foot thick, according the Native hunters, compared to a worldwide blubber layer of 15 cm (5.9 inches.) This suggests that a more than usual prey source is available to the Cook Inlet beluga whales. (In reference to PCE 2)
 - At present belugas in Cook Inlet are not known to contain any toxins, nor are the waters of Cook Inlet known to contain any detectable amount of toxins. (In reference to PCE 3)
 - There are no barriers to the passage of beluga whales now, or in the foreseeable future. In terms of need to manage this issue, the USACE and the US Coast Guard would regulate any proposed barriers to navigation (or passage), such as dams on the waters of the Cook Inlet. (In reference to PCE 4)
 - The belugas surfacing within the Level B take of 160 dB isopleths at the Port of Anchorage did not appear to be annoyed or harassed by it. Even the beluga themselves have vocal sounds around 219 dB, which are surely not causing harassment to their own species. (In reference to PCE 3)
- PCE 11 NMFS should include additional important prey species under primary constituent element two, such as: pink salmon, long-finned smelt, and Pacific herring.
- PCE 12 The primary constituent elements are so broad that the proposed rule cannot identify where they are located in the critical habitat designation.
- PCE 13 NMFS should further define primary constituent element five. This primary constituent element should not be the absence of in-water noise that results in abandonment, but rather, the absence of in-water noise that results in adverse impacts to the species' survival and recovery. Many noise impacts may adversely affect the species, impeding its ability to recover, yet not result in abandonment of habitat.
- PCE 14 In-water noise levels should not be included as a primary constituent element for Cook Inlet beluga whale critical habitat as it was previously considered and rejected as a primary constituent element for Southern Resident Killer Whale. In the final rule for designation of critical habitat for this species NMFS concluded that the effects of sound in the water were a direct effect to the animals themselves and not to their habitat.
- PCE 15 NMFS should clarify paragraph 226.200 (c) (1) by listing all medium and high accumulation rivers and including all tidal water within 5 miles (8km) of these rivers. This wording will avoid having to know what tidal level is relevant, and will avoid the necessity to define "medium and high flow accumulation rivers," and will provide for the shallow and deep waters (to include ebbing-tides) within these feeding areas.
- PCE 16 In relation to primary constituent element two, NMFS should adopt minimum escapement goals for eulachon (hooligan) and salmon, as the primary anadromous prey species of the beluga whale, in measurable rivers, in a manner similar to what has been

established by the State of Alaska in their fisheries management plans.

- PCE 17 NMFS should remove the term "absence of toxins and other agents," from primary constituent element two as it implies that a pristine environment is essential for species conservation.
- PCE 18 The primary constituent elements in the proposed rule accurately reflect the physical and biological attributes needed to sustain a healthy beluga population.
- PCE 19 The proposed rule identifies in-water noise as a primary constituent element but does not clearly identify which agency is responsible for enforcing regulations pertaining to this issue. NMFS should take the lead in providing leadership and the required regulation to protect them.
- PCE 20 The eradication of northern pike should be included as a special management consideration.
- PCE 21 The list of primary constituent elements in the proposed rule infers that other elements are not necessary for the conservation and recovery of Cook Inlet beluga. In this instance the primary constituent elements leave important gaps that are critical to the survival and recovery of Cook Inlet beluga.
- PCE 22 The concept of "high and medium flow accumulation anadromous fish streams" is not definitive and should not be used as a prescriptive delimiter of habitat function. If retained, NMFS should clarify this concept. Suggestions for clarification include:
- Listing all medium and high accumulation rivers and including all tidal water within 5 miles (8km) of these rivers.
- PCE 23 Prey availability has a strong influence on the distribution and relative abundance of Cook Inlet beluga whales.
- PCE 24 The determination that the primary constituent elements may require special management in the proposed rule is contradicted by the economic analysis, which does not identify a single project modification that would result from the critical habitat designation that would not already take place under existing management regimes.
- PCE 25 NMFS has not demonstrated that any of the primary constituent elements are actually limiting beluga whale production or their recovery in Cook Inlet. NMFS should further rationalize the inclusion of the identified elements in terms of their current impact to beluga whale survival and recovery in Cook Inlet.

INC of Critical Habitat (INC): Includes comments on areas that should be included in the critical habitat designation.

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- INC 1 The critical habitat designation should include all valuable habitat areas identified in the Conservation Plan for Cook Inlet Beluga Whales (Type 1, Type 2 and Type 3).
- INC 2 The critical habitat designation should be expanded to include corridors that connect alternate habitats to which belugas travel within Cook Inlet.
- INC 3 The critical habitat designation should include upstream areas of rivers whose mouths are designated as critical habitat because they support beluga prey habitat where prey breed, spawn, and travel. These rivers include: Big Susitna, Little Susitna, Kasilof, Yentna, Kenai, 20-Mile, Beluga, McCarthy, Tuksedney Bay, Crescent, and Eagle.
- INC 4 The critical habitat designation should be expanded to include upper and lower Cook Inlet.
- INC 5 The critical habitat designation should be expanded to include Ft. Richardson Eagle River Artillery Range and Eagle River Flats.
- INC 6 The critical habitat designation should be expanded to include historically used areas.
- INC 7 The critical habitat designation should be expanded to include Hudson Bay, near Churchill, Canada.
- INC 8 The critical habitat designation should be expanded to include Iniskin Bay.
- INC 9 The critical habitat designation should be expanded to include the Knik Watershed.
- INC 10 The critical habitat designation should be expanded to include Matanuska, Knik, and Eklutna Rivers and Cottonwood Creek.
- INC 11 The critical habitat designation should be expanded to include rearing habitat along Turnagain Arm, 20 Mile and Placer River.
- INC 12 The critical habitat designation should be expanded to include the Campbell and Ship Creeks and Knik Arm
- INC 13 The critical habitat designation should include the Central Inlet and Kachemak Bay.
- INC 14 The critical habitat designation should be expanded to include the entirety of Turnagain Arm and Knik Arm, the Kenai river, the Susitna river and submerged lands and waters from Homer to Kenai.
- INC 15 The critical habitat designation should be expanded to include the waters of Nanwalek.
- INC 16 The critical habitat designation should be expanded to include the lower reaches of Eagle River.
- INC 17 The critical habitat designation should be expanded to include all of Cook Inlet.

- INC 18 The critical habitat designation should include all coastal waters of Cook Inlet.
- INC 19 The critical habitat designation should include all proposed areas, with no exclusions or exemptions for economic benefit or national security including the Port of Anchorage, the military live-fire practice range on Fort Richardson, the Eagle River Flats range, the Knik Arm Bridge, the Asplund Waste Water Facility, and Iniskin Bay. The benefits of including these areas in the critical habitat designation outweigh the benefits of exclusion.
- INC 20 The critical habitat designation should include both Areas 1 and 2 as proposed by NMFS.

Regulatory Process and Legal Issues (REG): Includes comments about the regulatory process and legal issues for the designation of critical habitat. This category includes comments on NMFS' designation process including the economic analysis, supporting science, and existing regulations.

- REG 1 The existing data does not support or is insufficient to justify this critical habitat designation. Issues include:
- It does not establish a relationship between habitat conditions and changes in the population of beluga whales
 - the Cook Inlet beluga whales have not been proven to be a distinct population segment
 - There are natural fluctuations in population and distribution
 - Relying on data from the Gulf of St. Lawrence population of beluga whales incorrectly implies that beluga whales are experiencing similar conditions.
- REG 2 The proposed critical habitat designation should be finalized quickly without change.
- REG 3 NMFS should now develop a Recovery Plan for the Cook Inlet Beluga whale.
- REG 4 Local, State, and Federal coordination is important to this critical habitat designation and should be strengthened. Local coordination should include the municipality, fishing industry, businesses, organizations, native tribal groups, and other user groups.
- REG 5 NMFS should extend the public comment period on the Cook Inlet Beluga whale critical habitat designation.
- REG 6 NMFS should conduct a public hearing at a certain location, including Anchorage, Homer, Kenai, Wasilla and Tyonek.
- REG 7 Cook Inlet Beluga whales are not a “species” and should not be afforded the same protection under the Endangered Species Act.
- REG 8 The existing data does not establish a relationship between habitat conditions and changes in the Cook Inlet Beluga whale population. Therefore, the critical habitat designation is not justified or necessary.
- REG 9 Current survey efforts are inadequate to properly determine the Cook Inlet beluga whale population and/or distribution.
- REG 10 Existing State and Federal regulation and associated mitigation measures are adequate to protect Cook Inlet Beluga whales and the critical habitat listing is not necessary.
- REG 11 Insufficient data was made available prior to the public hearings.
- REG 12 The economic analysis is inadequate and does not properly quantify the true costs associated with critical habitat designation for the Cook Inlet beluga whales such as the costs of management activities, consultation, mitigation measures, compliance, legal council and associated lost tax and permitting revenues to the State of Alaska. This makes it impossible to determine whether certain areas should be considered for economic exclusion. NMFS must conduct a more robust economic analysis before any critical habitat designation is finalized. Specific projects and categories of projects that

must be addressed in the economic analysis include:

- New and replacement gas & oil pipelines and associated facilities.
- New off-shore drill platforms.
- Pipelines for distribution of fuel products, petrochemicals and CO₂ from coal liquefaction and gasification facilities.
- Chuitna coal mine and port facilities for shipping coal and receiving equipment, supplies, fuel, etc.
- CIRI In-Situ coal gasification.
- Port of Anchorage Expansion.
- Port of Anchorage ship traffic and operations.
- Port of Anchorage dredging.
- Utility upgrades (including AWWU).
- New and replacement sewage facilities for all communities on Cook Inlet
- Knik Ann Bridge construction and use.
- McKenzie Port, Alaska Railroad Intertie and the associated ship traffic.
- Military base maintenance and expansion.
- Commercial, private and military aircraft operations.
- Pebble project port facilities for shipping concentrates and receiving of equipment, supplies, fuel, etc.
- Ports for shipping gravel from Tyonek, Anchorage, Point McKenzie, etc. and the associated vessel traffic.
- Cook Inlet Ferry ports and traffic between Anchorage, Point McKenzie, Ladd Landing, Tyonek, Nikiski, Kenai, Homer, Iniskin Bay, etc.
- Energy projects (that could have lowered the cost of energy in the Cook Inlet area).
- Fishing industry and seafood processing.

REG 13 Additional research is needed to support proper management of the Cook Inlet Beluga whales including this critical habitat designation.

REG 14 Traditional and local historic knowledge of the Cook Inlet Belugas should be used in the critical habitat designation.

REG 15 The proposed critical habitat designation for Cook Inlet Beluga whales is inconsistent with the Endangered Species Act.

REG 16 The critical habitat designation should not be finalized until pending legal rulings on the status of the Cook Inlet Beluga whales are made.

REG 17 The reasons for the population decline are irrelevant to the critical habitat designation. The designation should be in place while additional studies are conducted.

REG 18 The analysis exaggerates the benefits of critical habitat designation for the Cook Inlet Beluga whales.

REG 19 Clarification is needed on how management of the proposed critical habitat and primary constituent elements will affect human activities in the designated areas (such as navigation, operations, and other activities authorized under existing permits).

REG 20 NMFS economic analysis is rational and properly addresses the costs of the critical

habitat designation apart from costs associated with other regulatory compliance.

- REG 21 Because NMFS has not yet complied with all of the applicable directives, such as the National Environmental Policy Act, Executive Order 13211, and Public Law 108-199, the proposed rule is unlawful.
- REG 22 The economic analysis should better quantify the values and benefits associated with the proposed critical habitat designation.
- REG 23 Stakeholder consultation for the proposed rule was inadequate.
- REG 24 NMFS will face litigation from the following entities if critical habitat is finalized without a more robust economic analysis: residents, class action suits, Alaska's business community, every local government, every utility, and the State of Alaska.
- REG 25 The economic analysis should have a repeatable method to compare quantitative and qualitative valuations of costs and benefits.
- REG 26 NMFS' choice of ten years as a period for evaluating economic impacts is insufficient. Such impacts are likely to continue for at least double that time.
- REG 27 NMFS should revise its weighing of the benefits of designation by recognizing the reality that a critical habitat designation and subsequent section 7 consultations will not offer protections to beluga whales or their habitats above those already in place, will have no effect on delisting beluga whales, will add significantly to the federal administrative burden, could have a negative effect on beluga and other environmental education efforts, as well as a negative effect on other environmental regulatory and management programs and efforts.
- REG 28 During its presentation at the public hearings on the proposed critical habitat designations for beluga whales, NMFS provided potentially misleading statistics on the number of consultations nationwide that have resulted in decisions of "no adverse modification". These statistics likely do not reflect the number of projects for which changes were required in order to receive a determination of "no adverse modification" nor do they include projects which were abandoned due to increased project costs.
- REG 29 NMFS analysis is limited to the potential for "significant generation of non-consumptive use benefits". Since the only consumptive use of belugas is by Alaska Natives for subsistence, which is tightly regulated, one can assume that the potential marginal increase by society of non- consumptive use is fully realized. Furthermore, most non-consumptive uses do not take place in a market, so assigning value is subjective.
- REG 30 The analysis indicates that marine and shore-side users may benefit from a more aesthetically appealing environment, and that is associated with a higher value. It is inaccurate to assume that this is the case. Users of an already pristine environment may realize minimal or no marginal benefit resulting from CHD. This is also contradictory to the cost side of the analysis that indicates little economic cost as development will continue.
- REG 31 The section on non-use or passive use benefits focuses on the very controversial practice of assigning society benefits by estimating a monetary value to consumers through

“Willingness to Pay”. The major issue with this analysis is that people do not accurately assess the maximum amount they are willing to pay, since it is hypothetical. In many cases, it is easy for people to overestimate the price they are willing to pay because there is no monetary consequence to their answer.

- REG 32 There are inconsistencies and deficiencies in the documentation and data provided by NMFS in support of its proposed rule. These include:
- NMFS uses different definitions of Area 1 and Area 2 in different sections of the proposed rule,
 - The maps NMFS provides in its proposed rule are at such low resolution that it is impossible for the public to infer that the proposed designations include waters of several important rivers,
 - The map coordinates NMFS provides in the proposed rule for defining its critical habitat boundaries are ambiguous (e.g. the coordinates “61.33.33 N” could be interpreted as degrees, minutes, and seconds or as decimal degrees), and
 - The spatial data NMFS provides on its website do not match the coordinates given in the critical habitat boundary descriptions.
- REG 33 The NMFS must provide justification for the designation of critical habitat inconsistent with comments provided to it by the State of Alaska and its political sub-divisions.
- REG 34 Once NMFS addresses the identified issues with the critical habitat designation, the public comment period should be reopened to allow for public and agency review and comment.
- REG 35 The proposed rule mischaracterizes the Cook Inlet Area as a densely populated urban area with development crowding the entirety of its shores and waters, and unregulated contaminants being discharged from a host of large industries.
- REG 36 There is a direct federal nexus with the critical habitat designation through the Magnuson-Stevens Act (MSA) to anadromous species. These anadromous species include hooligan, smelt and salmon.
- REG 37 NMFS should consider establishing a number of zones of critical habitats ranked in decreasing order of importance by feeding, calving areas, nursing areas, wintering areas, etc. with in-between higher ranked, critical areas or movement areas of lesser importance. These critical habitat zones could also be listed as seasonably important rather than of year round important.
- REG 38 While the proposed rule recognizes the importance of river mouths for feeding, it fails to adequately address the role of upriver hunting grounds and the need for their inclusion within the critical habitat designation and fails to clearly identify which "lower reaches" are included and to what extent the critical habitat area extends up the river.

Acknowledged (ACK): Includes submissions determined not to be substantive and warranted only a submissions acknowledged response.

8.0 REFERENCES

National Marine Fisheries Service. 2009. Endangered and threatened species: Designation of critical habitat for Cook Inlet beluga whale. Wednesday, December 2, 2009. 74 FR 63080 – 63095.

APPENDIX A
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<i>Kachemak Bay Conservation Society</i> Wolf, Elise	102, 759	ACK, IMP 6, IMP 7, EXT 6, INC 3, REG 22
<i>Kenai Peninsula Borough</i> Carey, David Robert	680	IMP 15, EXC 8
<i>Kenai Peninsula Borough Clerk's Office</i> Sprague, Pete	88	IMP 8, REG 5
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<i>Knik Arm Bridge and Toll Authority</i> Niemiec, Andrew	317, 738	IMP 4, EXC 9, PCE 2, PCE 9, PCE 10, PCE 11, PCE 12, REG 1, REG 10, REG 12, REG 14, REG 15, REG 19
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<i>MAP Consulting, LLC</i> Pease, Mary Ann	332, 698	REG 1, REG 12
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<i>Native Village of Eklutna</i> Lamoureaux, Marc	690	IMP 15, IMP 17, IMP 22, INC 3, INC 6, INC 10, INC 20
<i>Native Village of Tyonek</i> Sandstol, Angela	699	EXC 2, REG 4
<i>Natural Resource Defense Council</i>	710	IMP 14, IMP 25, INC 19, INC 20

Commenter	Submission ID	SOC's
Kiekow, Taryn		
<i>New York Whale and Dolphin Action League</i> Williams, Taffy	789	IMP 22
<i>North Gulf Oceanic Society</i> Matkin, Craig	796	IMP 7, INC 3, INC 20
<i>Ocean Renewable Power Company Alaska, LLC</i> Worthington, Monty	707	IMP 8
<i>Ocean River Institute</i> Moir, Rob	723	IMP 22
<i>Old Town Kenai</i> Peters, Bob	793	IMP 8, IMP 14, EXC 11
<i>PacRim Coal, LP</i> Graham, Daniel	101, 135544	ACK, EXC 4, REG 10, REG 19
<i>Personal Watercraft Club of Alaska</i> Mentzel, Rachel	369	IMP 8, IMP 14
<i>Port of Anchorage</i> Ribuffo, Stephen	628	EXC 6, REG 19
<i>Port of Anchorage</i> Sheffield, William	21, 308	IMP 1, IMP 3, IMP 4, EXC 6
<i>Renewable Energy Alaska Project</i> Rose, Chris	732	IMP 11
<i>Resource Development Council for Alaska, Inc.</i> Brune, Jason	25, 26, 306, 763	IMP 2, IMP 14, IMP 24, IMP 26, EXC 1, EXC 3, EXC 4, PCE 10, PCE 12, REG 5, REG 6, REG 12, REG 15, REG 21
<i>Seater & Company</i> Seater, Lee	95	ACK
<i>Seldovia Village Tribe</i> Collier, Crystal	752	EXC 12
<i>Senator Mark Begich's Office</i> Howard, Kim	166, 173	REG 12
<i>Sierra Club Alaska</i> Fehrenbacher, Emily	649, 708	ACK
<i>Silver Salmon Creek Lodge</i> Coray, David Alan	92	IMP 13
<i>Snug Harbor</i> Dale, Paul	176	ACK
<i>State of Alaska</i> Parnell, Sean	755	IMP 1, IMP 8, IMP 10, IMP 14, IMP 21, IMP 24, EXC 2, EXC 3, EXC 7, EXC 10, EXC 12, EXC 13, PCE 1, PCE 2, PCE 7, PCE 25, REG 1, REG 5, REG 10, REG 12, REG 18, REG 23, REG 27, REG 28, REG 29, REG 30, REG 31, REG 32, REG 33, REG 34, REG 35
<i>STEELFAB</i> Faulkner, Richard	685	ACK
<i>Stellar Oil & Gas, LLC.</i> Watt, James	757	EXC 3, REG 12
<i>Survey Point Holdings Incorporated</i> Berto, Bob	79	IMP 8
<i>Tacoma-Pierce County Chamber</i> Brackett, Gary D	625	ACK
<i>Temasco Helicopters Inc.</i> Hicks, Joe	747	REG 12

Commenter	Submission ID	SOC's
<i>The Humane Society of the United States</i> Young, Sharon	441	INC 14
<i>The Laughlin Company, LLC.</i> Laughlin, Kaye	658	IMP 4, IMP 8, REG 12
<i>The Odom Corporation</i> Odom, Jim	693	IMP 21
<i>The Pebble Partnership</i> MacCay, Charlotte	447	IMP 24, REG 1, REG 12, REG 15
<i>The Trust Land Office</i> Menefee, Marcie	748	IMP 8, IMP 28, REG 10
<i>Totem Ocean Trailer Express, Inc.</i> Kessler, Greg	300, 498	IMP 1, IMP 3, IMP 8, EXC 9, REG 8
<i>Totem Ocean Trailer Express, Inc.</i> Lowery, George	299, 675	IMP 1, IMP 2, IMP 5, IMP 8, IMP 14, IMP 21, IMP 24, EXC 6, EXC 9, PCE 2, REG 12
<i>Totem Ocean Trailer Express, Inc.</i> Morrell, Phil	715	IMP 5, IMP 21, EXC 9, REG 8
<i>Totem Ocean Trailer Express, Inc.</i> Thrasher, Mike	301, 676	IMP 21, EXC 9
<i>Transportation Institute</i> Berkowitz, Richard	342, 780	IMP 1, IMP 3
<i>Trustees for Alaska</i> Litmans, Brian	96, 756	ACK, PCE 14, INC 3, INC 6, INC 19, REG 22, REG 38
<i>Turnagain Arm Conservation League</i> Barnett, Gabrielle	103, 689	ACK, INC 11
<i>Turnagain Arm Tidal Energy Corp.</i> Lee, Dominic	691	EXC 10
<i>Tyonek Native Corporation</i> Harris, Tom	626	REG 12, REG 25
<i>Tyonek Native Corporation</i> Stephan, Michaelene	438	REG 5, REG 6
<i>United Cook Inlet Drift Association</i> Maw, Roland	178, 209	ACK, INC 3, REG 36
<i>United State Coast Guard</i> Wandelt, Edward F	681	PCE 14, REG 19
<i>United States Air Force, Elmendorf Air Force Base</i> Atkins, Dana	122, 671	ACK, IMP 3
<i>United States Air Force, Western Regional Environmental Office</i> Lamb, Mary	90	REG 5
<i>United States Air Force, Western Regional Environmental Office</i> Mendelsohn, Clare R	472, 671	ACK, EXC 14, PCE 14, PCE 15, PCE 16, PCE 17
<i>United States Navy</i> Shelanski, Herman	442	PCE 14
<i>United States Senate</i> Begich, Mark	717	IMP 1, EXC 2, REG 12
<i>Virginia Commonwealth University</i> Wegelin, Jacob A	353	ACK
<i>Whale Watching Alaska</i> Jameson, Robert E	148	ACK

Submissions Index – Table 2 Unique Submissions from Individuals

Commenter	Submission ID	SOC's
Abe, Michieal	84	IMP 22
Alex, Unknown	16	ACK
Anderson, David S	114707	IMP 22
Aplin, Dave	165	INC 6
Archibald, Robert	158	IMP 15
Bailey, Nina Faust and Edgar	143	ACK
Bailey, Theodore N	428	PCE 23, REG 37
Barber, Patti Lynn	465	IMP 8
Barnett, Gabrielle	314	INC 11
Barr, Mary F	69	IMP 8
Bartko, Sarah Lee	128	ACK
Bartko, Theodore D M	451	IMP 22
Becker, Charles Frederick	507	IMP 14, EXC 1
Beilfuss, Randy	655	IMP 8
Beltrami, Marja	497	INC 3
Bennett, Mel	192	IMP 1
Bergt, Steven	667	ACK
Bevis, Carol D	500	INC 3, REG 22
Birch, Jerome	656	IMP 1, IMP 8, IMP 9, IMP 14, IMP 16, IMP 28, REG 12
Bitter, Daisy Lee	630	INC 3
Bixby, Jerry Leonard	648	EXC 12
Black, Preston Samuel	60	ACK
Blatchford, DJ	315	ACK
Blau, Patricia	477	IMP 22
Bloechl, Mike	145	REG 13
Blossom, Doug	172	IMP 15
Bonds, Julia	149	INC 3
Brashers, Melissa	29	INC 4, INC 17
Braun, Eric D	659	IMP 2
Breeden, Timothy	294	IMP 28, REG 12
Bryant, Rick	746	IMP 8, IMP 15
Bundtzen, Robert Wayne	495	IMP 8, REG 1
Button, Karen	114714	INC 3
Caban, Doris	450	ACK
Cabana, Tim	670	IMP 15
Cameron, Neil M	714	IMP 8, REG 1
Campbell, Greg	82	IMP 6
Campodonico, Dean	445	ACK
Cannava, Mathew Michael	6, 175	ACK, IMP 7
Capozzelli, J	142	IMP 15, IMP 22
Capozzelli, R	351	ACK
Carlson, Michael	624	IMP 7, INC 12
Carlson, Rachael Diana	65	ACK
Casey, Larry P	647	IMP 22
Castner, Ken	153	ACK
Chickos, Lisa Ann	83, 307	ACK
Childs, Jeff	653	PCE 21, REG 13
Christiansen, Sue Ellen	668	ACK
Christopherson, Tim	180	IMP 9

Commenter	Submission ID	SOC's
Cicccone, Victoria	105	IMP 7, IMP 13
Clarke, Nova	454	IMP 22
Clifford, Margi	683	REG 3
Cohen, Ben	288	IMP 22
Cohen, Matthew	86	IMP 8
Cole, Fred James	291	ACK
Cook, Kenneth Howard	66	ACK
Cooper, Tom	87	IMP 22
Copoulos, Art	61	IMP 14, REG 1
Coray, Craig	93	IMP 22
Coray, Gail	91	ACK
Cornelius, Gene	67	ACK
Cornelius, Michele Suzanne	63	ACK
Cotogno, Sharron Anne	27	ACK
Cox, William M	730	ACK
Coyle, Darlene	136, 488	ACK
Cross, John W	186	IMP 22
Cummings, Terry	77	ACK
Dale, Phillip Gregory	4	EXC 12, REG 1
Daniels, Larry K	662	IMP 14, REG 13
De La Cruz, Yolanda	475	IMP 6
Delic, Danielle	325	ACK
DeMers, M H	50	INC 19
Dolese, Patty	486	ACK
Dolma, Brenda	80	ACK
Doyle, Bob	196	IMP 14, REG 7
Dushane, Jen	334	IMP 6
Dutton, Karla	338	IMP 25
Dyson, Gene	49	IMP 14
East, Katherine A	463, 600	EXT 1
Eley, Thomas J	505	ACK
Exline, Nicholas D	358	IMP 22, INC 1
Fair, Jeff	350	IMP 6
Faulkner, Brad	146	IMP 15, IMP 17, INC 4, INC 8, REG 9
Federico, Ken	112	EXC 10
Fischbach, Tracy Ann	458	IMP 25
Fletcher, Valerie	135534	INC 19, REG 3
Foster, Frederick Anthony	71	ACK
Fox, Sheila D	213	INC 1
Frank, Kreger	286	ACK
Frank, Mike and Diane	620	INC 14, INC 19
Frazier, Loran	203	ACK
Fystrom, Jo Anne	183	INC 7
Galt, Joan	212	ACK
Gentemann, Jim	28	IMP 10, REG 1
George, Davina Lyn	436	ACK
Gerken, Gene	367	IMP 2, IMP 8, IMP 14
Gloudant, Walter A	749	ACK
Gluth, Duane and Nancy	99	ACK
Gonzalez, Julian	618	ACK
Graber, Mark A	190	IMP 1
Graham, Nina	74	IMP 13

Commenter	Submission ID	SOC's
Gray Wolfe, Carrie	293	INC 3
Greenfield, Kevin	692	IMP 14, REG 12
Greenwalt, Arthur E	466	ACK
Grenier, Stuart H	705	ACK
Grey, Howard	323	IMP 14
Hall, Wayne	182, 210	ACK, IMP 22
Hays, Brenda	51	ACK
Herron, Richard	191	IMP 22
Herzog, Megan Marie	187	ACK
Highland, Lynn	106	ACK
Hiland, Robert	155	IMP 22
Hodges, Clinton	341	ACK
Hoffman, Bob	663	EXC 6, REG 1
Hofseth, Pauline	744	IMP 15, IMP 26
Hooper, John A	8	EXT 1
Horne, Charlotte	619	ACK
Houser, Marilyn	207	ACK
Howe, Duane L	46, 724	ACK, IMP 7
Hudson, Virginia	324	IMP 27
Hull, Andrew	135501	IMP 22
Hull, Arthur	135502	ACK
Iliff, Doris Blanche	666	IMP 7
Iliff, Dr. Charles Hunter	665	ACK
Irwin, Kathy Sarns	650	INC 17
Jackson, James	427	IMP 25, INC 3
Jed, Whittaker	289	IMP 15, IMP 16, REG 9, REG 12
Jeffress, Bill	320	REG 1
Jenkins, Roger	322, 790	ACK, IMP 14, REG 9, REG 12
Jensen, Andrea Lee	22	ACK
Jensen, Carol A	736	ACK
Jensen, John T	462	IMP 20, IMP 25
Johnson, Jill M	484	INC 3, INC 19
Johnson, Lisa	348	ACK
Kacher, Kathy L	62	IMP 14
Kandrор, Elizabeth	214	ACK
Keddall, Paul	309	ACK
Kichler, Staci	116	PCE 2, PCE 19
Kilcher, Maurice	171	ACK
Kilkenny, Anne	343	ACK
Klein, Janet	453	INC 13
Knauf, Jeffery G	114705	IMP 14, REG 12, REG 15
Lakosh, Tom	330	INC 3
Landi, Barbara	15	IMP 14
Landstrom, Lori J	615	INC 3
Lasselle, Bo Morgan	657	ACK
Lauster, Robyn	494, 609	IMP 6, IMP 7, INC 3
Lawson, John Robert	141	IMP 22
Lazarus, Jonnie	78	ACK
Lecso, Patrice Michelle	770	IMP 22
Lee, David	460	REG 13
Lemus, Nancy	139	IMP 14
Lentfer, Jack	452	INC 3

Commenter	Submission ID	SOC's
Leonard, James	501, 612	ACK, REG 17
Levesque, Daniel	321	EXT 4
Lilja, D K	89	ACK
Long, Becky	448	ACK
Lopez, Irene	354	ACK
Lord, Nancy	359	INC 3, INC 13, INC 20, REG 3
Lorente, Dominique	17	ACK
Lowe, Whitney	168	IMP 7
Lund, Rob	48	ACK
Lyon, Doug Martin	53	ACK
Lyon, Rebecca Ann	677	ACK
Maack, Christine	467	IMP 6
Mader, Thomas Henry	73	IMP 6
Markwardt, Darin	296	REG 1, REG 12
Marsh, Kenneth L	185	IMP 7
Martin, David	154	IMP 17, PCE 20, INC 3
Martin, Mildred M	197	INC 3, INC 15
Massey, Julian	318	REG 13
Matz, George	167	ACK
Mauger, Sue	737	INC 3, INC 19, INC 20, REG 3
Maykuth, Levi	138	ACK
McBride, Shannon	159	INC 3, INC 19
McCargo, David	114716	IMP 22
McCausland, Heather	284	REG 14
McCutcheon, Jerry	791	REG 24
Mellott, Barbara	652	ACK
Merkel, Nate	489, 608	ACK
Merkes, Grace Ellen	198	IMP 14
Milkeraitis, Emma	305	ACK
Miller, Douglas	651	ACK
Miller, Fred Arthur	81	IMP 8, REG 1
Miller, Leonard	504	IMP 14
Mitchell, Ruth A	127	INC 13
Mjos, Brita	118	ACK
Mohrbacher, Jesse	771	IMP 9
Moore, Apayo	772	IMP 13
Moore, Blake	56	IMP 2
Moore, Nancy Jean	664	INC 3
Moreno-Hinz, Lynette	327	IMP 27
Mulesky, Jay	360	IMP 15, EXC 1, PCE 23
Murray, L	195	INC 20
Narita, Kimiko	188	ACK
Nasif, Maria	47, 20185, 20652	IMP 7, IMP 25, PCE 18, INC 19
Nelson, Dan	44	ACK
Nelson, Emil	431	EXC 10
Nelson, Jessie	432	REG 1
Nelson, Jessie (Beaver)	163	IMP 15
Neumann, Elizabeth	162	ACK
Neumeister, Bill	179	ACK
Nevin, John	642	ACK
Nicholson, Melanie	502, 613	ACK, IMP 22
Nolan, John K	24	ACK

Commenter	Submission ID	SOC's
Northon, Cherie A	493	ACK
O'Brien, John Adrien	2	ACK
O'Meara, Michael S	157, 704	IMP 25, INC 3, INC 20
Ohse, Lilli	776	ACK
Okonek, Brian J	366	IMP 25
Okonek, Diane C	194	ACK
Oliveira, Lurdes de	13	ACK
Olsen, Susan	456	IMP 7
Olson, Marvin	193	IMP 8
Oslund, Mark D	766	PCE 23
Oslund, Suzette M	761	IMP 17
Pahl, Jen	464	ACK
Paniptchuk, Earl	104	ACK
Parr, Crawford	333	ACK
Pawlowski, Bob	303	REG 12
Pease, Nancy	361	IMP 22
Perera, Emil	1	ACK
Polonowski, John	125	IMP 6, IMP 13
Polunc, Joseph	23	REG 1
Portman, Carl	177	IMP 2, IMP 14, IMP 28, EXC 3, REG 10
Poths, Gina	346	IMP 14, PCE 3, REG 10
Praetorius, Pete W	775	ACK
Public, Jean	110	ACK
Ransdell, Rebecca Jane	785	ACK
Ransdell-Green, Joseph Elias	52	IMP 22, EXT 2, EXT 3
Ransy, Denis	205	IMP 25, INC 3, INC 20
Rasy, Michael	459	IMP 6, IMP 7, REG 3
Rauhala, Tracey	120	ACK
Raynor, Diane	113	ACK
Reardon, Julius Charles	364	IMP 2, EXC 4, REG 1, REG 12, REG 13
Reed, Lewis	64	IMP 8
Reilly, Barbara	750	IMP 6
Renick, Charles Kiel	741	ACK
Rennick, P R	449	ACK
Rijn, Shathi	18	ACK
Romano, Denette Justus	76	REG 7
Rose, Sam	758	IMP 22
Rothe, Thomas	483	PCE 2, PCE 24, INC 5, REG 4, REG 24
Rude, Steven M	779	IMP 24
Rush, Vernon W	768	REG 19
Ryan, Shirley Catherine	499	ACK
Sack, Janet	457, 599	ACK, REG 3
Saner, Stanley L	678	IMP 8
Sankar, Pooja	355	ACK
Sanner, Carol Jo	70	REG 13
Sawyer, Rebecca	147	ACK
Schlein, Will	137, 160	IMP 7, IMP 25
Schmidt, Joshua	434	INC 20
Schooley, Marcia Ann	646	ACK
Schopf, Randy (Tiny)	68	ACK
Schubert, Stacy	337	IMP 14
Scoresby, Bryan	347	IMP 1, IMP 8, IMP 15

Commenter	Submission ID	SOC's
Sczawinski, Timothy M	59	REG 3
Seaver, Timothy	508	IMP 6, IMP 7, IMP 13
Sennett, Cheryl	461	ACK
Shavelson, Bob	161	REG 22
Shea, Maura J	72	IMP 13
Sheshunoff, Alex	45	ACK
Smith, Kim Randolph	640	ACK
Smrdel, Jack J	773	IMP 13
Snipes, Bridgit	439	ACK
Spears, Tina	622	ACK
Spector, Helena Nancy	114, 362	ACK
Sperbeck, Nicole	115	REG 19
Spittler, Peggy M	117	IMP 14
Spotts, Mary Jo	706	IMP 13, INC 3
Springer, Heinrich	694	IMP 8, REG 1, REG 12
Stacey, J Dennis	787	IMP 3, IMP 8, IMP 14, IMP 28, EXC 2, REG 12, REG 13
Standish, Robert J	654	ACK
Stanek, Ronald Ted	311, 661	IMP 17, PCE 11, INC 3, REG 13
Stange, Jay A	753	ACK
Stark, Douglas	170, 797	IMP 2, IMP 9, IMP 14, IMP 15, EXC 10
Stevens, Ruth	302	ACK
Stohl, Judy	718	ACK
Stokes, Peter	720	IMP 8, REG 1
Strasenburgh, John	474	INC 3, REG 3
Strickland, Dan	686	IMP 22
Sullivan, Deborah M	54	ACK
Surve, Triptaa	135508	INC 19
Sutton, James Hepburn	491	INC 19
Swift, Kase	745	ACK
Tarbox, Kenneth	57, 174	IMP 17, PCE 23, INC 3, INC 14
Theodore, Chief Paul	292	IMP 22, REG 14
Thompson, Deborah A	126	INC 13
Thompson, Everett Leroy	684	ACK
Thompson, Michael James	85	ACK
Thompson, T	356	IMP 17, INC 14
Tollefsrud, DeWaine	733	INC 3
Tollefsrud, Jane	777	IMP 6, INC 3
Trasky, Lance Link	492	IMP 25
Trefon, Brenda	616	ACK
Tuten, Craig	58	IMP 7
Unknown	3	EXT 1
Unknown	94	ACK
Unknown	111	IMP 22
Unknown	444	REG 12
Unknown	660	ACK
Vanderburg, Kelly Dufort Isaac	368	IMP 6, IMP 7, INC 3
von Reitz, Anna M	75	ACK
Vondersaar, Frank	144	ACK
Walker, Karen	124	ACK
Walker, Tara	211	IMP 7
Wall, Renae	199, 206	IMP 14, REG 11, REG 24
Wall, Robert K	181, 200, 208	IMP 14, REG 4, REG 11

Commenter	Submission ID	SOC's
Wasserman, Elizabeth	326	IMP 6
Webb, Bruce D	595	IMP 8, IMP 10, IMP 16, IMP 24, IMP 26, REG 10, REG 12, REG 18, REG 24, REG 25
Weiss, Miranda	164	ACK
Whitney, Clark G	634	REG 1
Williams, Danielle S	719	IMP 6, INC 3
Williams, Stephen F	485	INC 3
Willis, Wade	335	INC 20
Wilson III, Verner Stor	781	ACK
Winkley, Barbara	313, 433	ACK
Wolf, Elise	169	IMP 12, EXT 1, REG 22
Wolter, Erika B	695	ACK
Woods, Noel W	435	ACK
Worthington, L	769	ACK
Zager, John	621	IMP 2, REG 10
Springer, Heinrich	629	REG 1, REG 12
Wieland, Ame	340, 410	IMP 3, REG 12

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SOC	Organization and Individuals
IMP	
IMP 1	Bryan Scoresby (347) Jerome Birch (656) Mark A Graber (190) Mel Bennett (192) Alaska Railroad Corporation - Bruce Carr (606) Alaska State Chamber of Commerce - Caroline Higgins (298) City of Houston - Roger Purcell (455) Horizon Lines - Kenneth Privratsky (476) Port of Anchorage - William Sheffield (308) State of Alaska - Sean Parnell (755) Totem Ocean Trailer Express, Inc. - George Lowery (299) Totem Ocean Trailer Express, Inc. - George Lowery (675) Totem Ocean Trailer Express, Inc. - Greg Kessler (300) Transportation Institute - Richard Berkowitz (342) United States Senate - Mark Begich (717)
IMP 2	Blake Moore (56) Carl Portman (177) Douglas Stark (170) Eric D Braun (659) Gene Gerken (367) John Zager (621) Julius Charles Reardon (364) Alaska Earth Sciences - Robert Retherford (627) Alaska North Pacific Shipping - Les Cronk (133) Alaska Railroad Corporation - Bruce Carr (606) Alaska State Legislature, House of Representatives - Charisse Millett (357) Alaska State Legislature, Legislative Affairs Agency - Jeff Turner (697) City of Houston - Roger Purcell (455) Crowley Marine Services - Robert Cox (674) Energy API - Richard Ranger (701) Resource Development Council for Alaska, Inc. - Jason Brune (306) Totem Ocean Trailer Express, Inc. - George Lowery (675)
IMP 3	J Dennis Stacey (787) Ame Wieland (340) Alaska Miners Association - Steven Borell (727) City of Houston - Roger Purcell (455) Municipality of Anchorage - Daniel Sullivan (751) Municipality of Anchorage - George Vakalis (297) Port of Anchorage - William Sheffield (21) Totem Ocean Trailer Express, Inc. - Greg Kessler (300) Totem Ocean Trailer Express, Inc. - Greg Kessler (498) Transportation Institute - Richard Berkowitz (342) Transportation Institute - Richard Berkowitz (780) United States Air Force, Elmendorf Air Force Base - Dana Atkins (122)
IMP 4	Alaska Maritime Agencies - Robert Arts (108) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) Port of Anchorage - William Sheffield (308) The Laughlin Company, LLC. - Kaye Laughlin (658)
IMP 5	Totem Ocean Trailer Express, Inc. - George Lowery (299)

SOC	Organization and Individuals
	Totem Ocean Trailer Express, Inc. - George Lowery (675) Totem Ocean Trailer Express, Inc. - Phil Morrell (715)
IMP 6	Barbara Reilly (750) Christine Maack (467) Danielle S Williams (719) Elizabeth Wasserman (326) Greg Campbell (82) Jane Tollefsrud (777) Jeff Fair (350) Jen Dushane (334) John Polonowski (125) Kelly Dufort Isaac Vanderburg (368) Michael Rasy (459) Robyn Lauster (494) Thomas Henry Mader (73) Timothy Seaver (508) Yolanda De La Cruz (475) Alaska Survival - Becky Long (204) Kachemak Bay Conservation Society - Elise Wolf (759) Kachemak Bay Conservation Society - Roberta Highland (468)
IMP 7	Craig Tuten (58) Doris Blanche Iliff (666) Duane L Howe (46) Kelly Dufort Isaac Vanderburg (368) Kenneth L Marsh (185) Maria Nasif (47) Mathew Michael Cannava (175) Michael Carlson (624) Michael Rasy (459) Robyn Lauster (494) Susan Olsen (456) Tara Walker (211) Timothy Seaver (508) Victoria Ciccone (105) Whitney Lowe (168) Will Schlein (160) Alaska Survival - Becky Long (204) Audubon Alaska - John Schoen (743) Bowman's Bearcreek Lodge - Kent Bowman (121) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487) Kachemak Bay Conservation Society - Elise Wolf (759) North Gulf Oceanic Society - Craig Matkin (796)
IMP 8	Bruce D Webb (595) Bryan Scoresby (347) Fred Arthur Miller (81) Gene Gerken (367) Heinrich Springer (694) J Dennis Stacey (787) Jerome Birch (656) Lewis Reed (64) Marvin Olson (193) Mary F Barr (69) Matthew Cohen (86) Neil M Cameron (714)

SOC	Organization and Individuals
	Patti Lynn Barber (465) Peter Stokes (720) Randy Beilfuss (655) Rick Bryant (746) Robert Wayne Bundtzen (495) Stanley L Saner (678) Air Liquide America LP - Brian D Benson (623) Alaska Maritime Agencies - Robert Arts (108) Alaska Miners Association - Steven Borell (727) Alaska State Chamber of Commerce - Wayne Stevens (365) Anchorage Chamber of Commerce - Sami Glascott (510) City of Houston - Roger Purcell (455) City of Kenai - Rick Koch (709) ConocoPhillips Alaska, Inc. - Dan Clark (754) Cook Inlet Tug & Barge Co. - Bradley Kroon (603) Cook Inlet Tug & Barge Co. - Carl Anderson (40) Crowley Marine Services - Robert Cox (674) Escopeta Oil Company - Danny Davis (602) Export Council of Alaska - Anthony Follett (352) Kenai Peninsula Borough Clerk's Office - Pete Sprague (88) Matanuska-Susitna Borough - Cheryl Marino (130) MatSu Business Alliance - Kay Slack (201) MatSu Business Alliance - Kay Slack (739) Municipality of Anchorage - Daniel Sullivan (19) Municipality of Anchorage - Daniel Sullivan (20) Ocean Renewable Power Company Alaska, LLC - Monty Worthington (707) Old Town Kenai - Bob Peters (793) Personal Watercraft Club of Alaska - Rachel Mentzel (369) State of Alaska - Sean Parnell (755) Survey Point Holdings Incorporated - Bob Berto (79) The Laughlin Company, LLC. - Kaye Laughlin (658) The Trust Land Office - Marcie Menefee (748) Totem Ocean Trailer Express, Inc. - George Lowery (675) Totem Ocean Trailer Express, Inc. - Greg Kessler (498)
IMP 9	Douglas Stark (170) Jerome Birch (656) Jesse Mohrbacher (771) Tim Christopherson (180) CGGVeritas Land (US) Inc. - Scott Nish (721) Judy Patrick Photography - Judy Patrick (512)
IMP 10	Bruce D Webb (595) Jim Gentemann (28) State of Alaska - Sean Parnell (755)
IMP 11	Renewable Energy Alaska Project - Chris Rose (732)
IMP 12	Elise Wolf (169)
IMP 13	Apayo Moore (772) Jack J Smrdel (773) John Polonowski (125) Mary Jo Spotts (706) Maura J Shea (72) Nina Graham (74) Timothy Seaver (508) Victoria Ciccone (105)

SOC	Organization and Individuals
	Kachemak Bay Conservation Society - Roberta Highland (468) Silver Salmon Creek Lodge - David Alan Coray (92)
IMP 14	Art Copoulos (61) Barbara Landi (15) Bob Doyle (196) Carl Portman (177) Charles Frederick Becker (507) Douglas Stark (170) Gene Dyson (49) Gene Gerken (367) Gina Poths (346) Grace Ellen Merkes (198) Howard Grey (323) J Dennis Stacey (787) Jeffery G Knauf (114705) Jerome Birch (656) Kathy L Kacher (62) Kevin Greenfield (692) Larry K Daniels (662) Leonard Miller (504) Nancy Lemus (139) Peggy M Spittler (117) Renae Wall (199) Renae Wall (206) Robert K Wall (181) Robert K Wall (208) Roger Jenkins (790) Stacy Schubert (337) Alaska State Chamber of Commerce - Wayne Stevens (365) Alaska State Legislature, House of Representatives - Charisse Millett (357) City of Houston - Roger Purcell (455) City of Kenai - Rick Koch (709) ConocoPhillips Alaska, Inc. - Dan Clark (754) Gimarc Consulting - Alex Gimarc (140) Horizon Lines - Kenneth Privratsky (476) Kenai Peninsula Fishermen's Association - Paul Shadura II (788) Matanuska-Susitna Borough - Dana Duffy (679) Natural Resource Defense Council - Taryn Kiekow (710) Old Town Kenai - Bob Peters (793) Personal Watercraft Club of Alaska - Rachel Mentzel (369) Resource Development Council for Alaska, Inc. - Jason Brune (763) State of Alaska - Sean Parnell (755) Totem Ocean Trailer Express, Inc. - George Lowery (675)
IMP 15	Brad Faulkner (146) Bryan Scoresby (347) Doug Blossom (172) Douglas Stark (797) J Capozzelli (142) Jay Mulesky (360) Jessie (Beaver) Nelson (163) Pauline Hofseth (744) Rick Bryant (746) Robert Archibald (158) Tim Cabana (670)

SOC	Organization and Individuals
	Whittaker Jed (289) Alaska State Legislature, House District 35 - Paul Seaton (703) Conservative Patriots Group - Calli Donn (290) Horizon Lines - Kenneth Privratsky (476) Kenai Peninsula Borough - David Robert Carey (680) Kenai Peninsula Fishermen's Association - Paul Shadura II (788) Millrock Exploration Corp. - St.Philip George (119) Native Village of Eklutna - Marc Lamoureaux (690)
IMP 16	Bruce D Webb (595) Jerome Birch (656) Whittaker Jed (289) Export Council of Alaska - Anthony Follett (352)
IMP 17	Brad Faulkner (146) David Martin (154) Kenneth Tarbox (57) Ronald Ted Stanek (661) Suzette M Oslund (761) T Thompson (356) Cook Inlet Tug & Barge Co. - Carl Anderson (40) Native Village of Eklutna - Marc Lamoureaux (690)
IMP 18	Kenai Peninsula Fishermen's Association - Paul Shadura II (788)
IMP 19	Kenai Peninsula Fishermen's Association - Paul Shadura II (336) Kenai Peninsula Fishermen's Association - Paul Shadura II (788)
IMP 20	John T Jensen (462)
IMP 21	Alaska Maritime Agencies - Robert Arts (108) Cook Inlet Tug & Barge Co. - Bradley Kroon (603) Cook Inlet Tug & Barge Co. - Carl Anderson (40) Export Council of Alaska - Anthony Follett (109) State of Alaska - Sean Parnell (755) The Odom Corporation - Jim Odom (693) Totem Ocean Trailer Express, Inc. - George Lowery (299) Totem Ocean Trailer Express, Inc. - George Lowery (675) Totem Ocean Trailer Express, Inc. - Mike Thrasher (301) Totem Ocean Trailer Express, Inc. - Mike Thrasher (676) Totem Ocean Trailer Express, Inc. - Phil Morrell (715)
IMP 22	Unknown (111) Andrew Hull (135501) Ben Cohen (288) Chief Paul Theodore (292) Craig Coray (93) Dan Strickland (686) David McCargo (114716) David S Anderson (114707) J Capozzelli (142) John Robert Lawson (141) John W Cross (186) Joseph Elias Ransdell-Green (52) Larry P Casey (647) Melanie Nicholson (502) Michieal Abe (84) Nancy Pease (361) Nicholas D Exline (358) Nova Clarke (454)

SOC	Organization and Individuals
	Patrice Michelle Lecso (770) Patricia Blau (477) Richard Herron (191) Robert Hiland (155) Sam Rose (758) Theodore D M Bartko (451) Tom Cooper (87) Wayne Hall (182) Cook Inlet Marine Mammal Council - Delice Calcote (295) Cook Inlet Marine Mammal Council - Delice Calcote (114706) Four All Direction Foundation - Debra Pieplow (287) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487) Kachemak Bay Conservation Society - Roberta Highland (468) Native Village of Eklutna - Marc Lamoureaux (690) New York Whale and Dolphin Action League - Taffy Williams (789) Ocean River Institute - Rob Moir (723)
IMP 23	Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487)
IMP 24	Bruce D Webb (595) Steven M Rude (779) Alaska State Chamber of Commerce - Wayne Stevens (365) Alaska Support Industry Alliance - Graham Smith (604) Anchorage Chamber of Commerce - Sami Glascott (510) Cook Inlet Tug & Barge Co. - Bradley Kroon (603) Crowley Marine Services - Robert Cox (674) Horizon Lines - Kenneth Privratsky (476) Resource Development Council for Alaska, Inc. - Jason Brune (306) State of Alaska - Sean Parnell (755) The Pebble Partnership - Charlotte MacCay (447) Totem Ocean Trailer Express, Inc. - George Lowery (675)
IMP 25	Brian J Okonek (366) Denis Ransy (205) James Jackson (427) John T Jensen (462) Karla Dutton (338) Lance Link Trasky (492) Maria Nasif (47) Michael S O'Meara (157) Tracy Ann Fischbach (458) Will Schlein (137) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (312) Natural Resource Defense Council - Taryn Kiekow (710)
IMP 26	Bruce D Webb (595) Pauline Hofseth (744) Air Liquide America LP - Brian D Benson (623) Alaska Maritime Agencies - Robert Arts (108) Alaska Miners Association - Steven Borell (727) Alaska State Legislature, House of Representatives - Charisse Millett (357) Alaska State Legislature, Legislative Affairs Agency - Jeff Turner (697) Resource Development Council for Alaska, Inc. - Jason Brune (306)
IMP 27	Lynette Moreno-Hinz (327) Virginia Hudson (324)
IMP 28	Carl Portman (177) J Dennis Stacey (787)

SOC	Organization and Individuals
	Jerome Birch (656) Timothy Breeden (294) CGGVeritas Land (US) Inc. - Scott Nish (721) Cook Inlet Tug & Barge Co. - Bradley Kroon (603) The Trust Land Office - Marcie Menefee (748)
EXC	
EXC 1	Charles Frederick Becker (507) Jay Mulesky (360) Air Liquide America LP - Brian D Benson (623) Alaska Maritime Agencies - Robert Arts (108) Alaska North Pacific Shipping - Les Cronk (133) Alaska State Chamber of Commerce - Wayne Stevens (365) City of Kenai - Rick Koch (709) ConocoPhillips Alaska, Inc. - Dan Clark (754) Export Council of Alaska - Anthony Follett (352) Judy Patrick Photography - Judy Patrick (512) Municipality of Anchorage - George Vakalis (297) Resource Development Council for Alaska, Inc. - Jason Brune (763)
EXC 2	J Dennis Stacey (787) Alaska Miners Association - Steven Borell (727) Native Village of Tyonek - Angela Sandstol (699) State of Alaska - Sean Parnell (755) United States Senate - Mark Begich (717)
EXC 3	Carl Portman (177) Alaska Railroad Corporation - Bruce Carr (606) Cook Inlet Region, Inc. - Margaret Brown (782) Resource Development Council for Alaska, Inc. - Jason Brune (763) State of Alaska - Sean Parnell (755) Stellar Oil & Gas, LLC. - James Watt (757)
EXC 4	Julius Charles Reardon (364) Amak Towing Company, Inc. - John Thompson (702) ConocoPhillips Alaska, Inc. - Dan Clark (754) PacRim Coal, LP - Daniel Graham (135544) Resource Development Council for Alaska, Inc. - Jason Brune (306) Resource Development Council for Alaska, Inc. - Jason Brune (763)
EXC 5	ConocoPhillips Alaska, Inc. - Dan Clark (754)
EXC 6	Bob Hoffman (663) Cook Inlet Tug & Barge Co. - Bradley Kroon (603) Matanuska-Susitna Borough - Dana Duffy (679) Port of Anchorage - Stephen Ribuffo (628) Port of Anchorage - William Sheffield (21) Totem Ocean Trailer Express, Inc. - George Lowery (675)
EXC 7	Horizon Lines - Kenneth Privratsky (476) State of Alaska - Sean Parnell (755)
EXC 8	Kenai Peninsula Borough - David Robert Carey (680)
EXC 9	Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) Totem Ocean Trailer Express, Inc. - George Lowery (299) Totem Ocean Trailer Express, Inc. - Greg Kessler (300) Totem Ocean Trailer Express, Inc. - Greg Kessler (498) Totem Ocean Trailer Express, Inc. - Mike Thrasher (676) Totem Ocean Trailer Express, Inc. - Phil Morrell (715)
EXC 10	Douglas Stark (170)

SOC	Organization and Individuals
	Emil Nelson (431) Ken Federico (112) State of Alaska - Sean Parnell (755) Turnagain Arm Tidal Energy Corp. - Dominic Lee (691)
EXC 11	Old Town Kenai - Bob Peters (793)
EXC 12	Jerry Leonard Bixby (648) Phillip Gregory Dale (4) Seldovia Village Tribe - Crystal Collier (752) State of Alaska - Sean Parnell (755)
EXC 13	State of Alaska - Sean Parnell (755)
EXC 14	United States Air Force, Western Regional Environmental Office - Clare R Mendelsohn (472)
EXT	
EXT 1	Unknown (3) Elise Wolf (169) John A Hooper (8) Katherine A East (463)
EXT 2	Joseph Elias Ransdell-Green (52)
EXT 3	Joseph Elias Ransdell-Green (52)
EXT 4	Daniel Levesque (321)
EXT 5	Kachemak Bay Conservation Society - Roberta Highland (468)
EXT 6	Kachemak Bay Conservation Society - Elise Wolf (759) Marine Mammal Commission - Tim Ragen (114713)
EXT 7	Marine Mammal Commission - Tim Ragen (114713)
PCE	
PCE 1	Alaska Department of Fish and Game - Douglas Lang (316) State of Alaska - Sean Parnell (755)
PCE 2	Staci Kichler (116) Thomas Rothe (483) Alaska Department of Fish and Game - Douglas Lang (316) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) State of Alaska - Sean Parnell (755) Totem Ocean Trailer Express, Inc. - George Lowery (675)
PCE 3	Gina Poths (346) Alaska Earth Sciences - Robert Retherford (627) Alaska State Chamber of Commerce - Caroline Higgins (298)
PCE 4	Anchorage Water and Wastewater Utility - Brett Jokela (319) Anchorage Water and Wastewater Utility - Brett Jokela (764)
PCE 5	Anchorage Water and Wastewater Utility - Brett Jokela (319)
PCE 6	Anchorage Water and Wastewater Utility - Brett Jokela (764)
PCE 7	Anchorage Water and Wastewater Utility - Brett Jokela (764) State of Alaska - Sean Parnell (755)
PCE 8	Center for Biological Diversity - Rebecca Noblin (722) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487)
PCE 9	Knik Arm Bridge and Toll Authority - Andrew Niemiec (317) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) Municipality of Anchorage - Daniel Sullivan (751)
PCE 10	Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) Resource Development Council for Alaska, Inc. - Jason Brune (763)
PCE 11	Ronald Ted Stanek (311)

SOC	Organization and Individuals
	Ronald Ted Stanek (661) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738)
PCE 12	Chugach Electric Association, Inc. - Bradley Evans (479) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) Resource Development Council for Alaska, Inc. - Jason Brune (763)
PCE 13	Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487)
PCE 14	Trustees for Alaska - Brian Litmans (756) United State Coast Guard - Edward F Wandelt (681) United States Air Force, Western Regional Environmental Office - Clare R Mendelsohn (472) United States Navy - Herman Shelanski (442)
PCE 15	United States Air Force, Western Regional Environmental Office - Clare R Mendelsohn (472)
PCE 16	United States Air Force, Western Regional Environmental Office - Clare R Mendelsohn (472)
PCE 17	United States Air Force, Western Regional Environmental Office - Clare R Mendelsohn (472)
PCE 18	Maria Nasif (47)
PCE 19	Staci Kichler (116) Alaska Center for the Environment - Valerie Connor (632)
PCE 20	David Martin (154)
PCE 21	Jeff Childs (653)
PCE 22	Anchorage Water and Wastewater Utility - Brett Jokela (764)
PCE 23	Jay Mulesky (360) Kenneth Tarbox (57) Mark D Oslund (766) Theodore N Bailey (428)
PCE 24	Thomas Rothe (483) ConocoPhillips Alaska, Inc. - Dan Clark (754)
PCE 25	Alaska Department of Fish and Game - Douglas Lang (316) State of Alaska - Sean Parnell (755)
INC	
INC 1	Nicholas D Exline (358) Sheila D Fox (213) Cook Inletkeeper - Bob Shavelson (643)
INC 2	Audubon Alaska - John Schoen (743) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487)
INC 3	Carol D Bevis (500) Carrie Gray Wolfe (293) Daisy Lee Bitter (630) Danielle S Williams (719) David Martin (154) Denis Ransy (205) DeWaine Tollefsrud (733) Jack Lentfer (452) James Jackson (427) Jane Tollefsrud (777) Jill M Johnson (484) John Strassenburgh (474) Julia Bonds (149) Karen Button (114714)

SOC	Organization and Individuals
	Kelly Dufort Isaac Vanderburg (368) Kenneth Tarbox (57) Kenneth Tarbox (174) Lori J Landstrom (615) Marja Beltrami (497) Mary Jo Spotts (706) Michael S O'Meara (157) Michael S O'Meara (704) Mildred M Martin (197) Nancy Lord (359) Nancy Jean Moore (664) Robyn Lauster (494) Robyn Lauster (609) Ronald Ted Stanek (311) Shannon McBride (159) Stephen F Williams (485) Sue Mauger (737) Tom Lakosh (330) Alaska Big Village Network - Carl Wassilie (331) Alaska Center for the Environment - Valerie Connor (632) Alaska Survival - Becky Long (204) Center for Biological Diversity - Rebecca Noblin (722) Center for Water Advocacy - Nikos Pastos (329) Cook Inlet Marine Mammal Council - Delice Calcote (295) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (312) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487) Kachemak Bay Conservation Society - Elise Wolf (759) Native Village of Eklutna - Marc Lamoureaux (690) North Gulf Oceanic Society - Craig Matkin (796) Trustees for Alaska - Brian Litmans (756) United Cook Inlet Drift Association - Roland Maw (209)
INC 4	Brad Faulkner (146) Melissa Brashers (29) Center for Water Advocacy - Nikos Pastos (329) Law Office of Dane E. Johnson, LLC - Dane Johnson (7)
INC 5	Thomas Rothe (483)
INC 6	Dave Aplin (165) Marine Mammal Commission - Tim Ragen (114713) Native Village of Eklutna - Marc Lamoureaux (690) Trustees for Alaska - Brian Litmans (756)
INC 7	Jo Anne Fystrom (183)
INC 8	Brad Faulkner (146)
INC 9	Knik River Watershed Group - Robert V Howard (509)
INC 10	Native Village of Eklutna - Marc Lamoureaux (690)
INC 11	Gabrielle Barnett (314) Turnagain Arm Conservation League - Gabrielle Barnett (689)
INC 12	Michael Carlson (624)
INC 13	Deborah A Thompson (126) Janet Klein (453) Nancy Lord (359) Ruth A Mitchell (127) Kachemak Bay Conservation Society - Roberta Highland (468)

SOC	Organization and Individuals
INC 14	Kenneth Tarbox (57) Mike and Diane Frank (620) T Thompson (356) Bowman's Bearcreek Lodge - Kent Bowman (121) The Humane Society of the United States - Sharon Young (441)
INC 15	Mildred M Martin (197)
INC 16	Kachemak Bay Conservation Society - Roberta Highland (468)
INC 17	Kathy Sarns Irwin (650) Melissa Brashers (29) Cook Inlet Marine Mammal Council - Delice Calcote (295)
INC 18	Cook Inlet Marine Mammal Council - Delice Calcote (114706) Marine Mammal Commission - Tim Ragen (114713)
INC 19	James Hepburn Sutton (491) Jill M Johnson (484) M H DeMers (50) Maria Nasif (47) Mike and Diane Frank (620) Shannon McBride (159) Sue Mauger (737) Triptaa Surve (135508) Valerie Fletcher (135534) Alaska Center for the Environment - Valerie Connor (632) Center for Biological Diversity - Rebecca Noblin (722) Kachemak Bay Conservation Society - Roberta Highland (468) Natural Resource Defense Council - Taryn Kiekow (710) Trustees for Alaska - Brian Litmans (756)
INC 20	Denis Ransy (205) Joshua Schmidt (434) L Murray (195) Michael S O'Meara (704) Nancy Lord (359) Sue Mauger (737) Wade Willis (335) Alaska Center for the Environment - Valerie Connor (632) Alaska Survival - Becky Long (204) Audubon Alaska - John Schoen (310) Center for Biological Diversity - Rebecca Noblin (722) Kachemak Bay Conservation Society - Roberta Highland (468) Native Village of Eklutna - Marc Lamoureaux (690) Natural Resource Defense Council - Taryn Kiekow (710) North Gulf Oceanic Society - Craig Matkin (796)
REG	
REG 1	Art Copoulos (61) Bill Jeffress (320) Bob Hoffman (663) Clark G Whitney (634) Darin Markwardt (296) Fred Arthur Miller (81) Heinrich Springer (694) Jessie Nelson (432) Jim Gentemann (28) Joseph Polunc (23) Julius Charles Reardon (364)

SOC	Organization and Individuals
	Neil M Cameron (714) Peter Stokes (720) Phillip Gregory Dale (4) Robert Wayne Bundtzen (495) Heinrich Springer (629) Alaska Railroad Corporation - Bruce Carr (606) Alaska State Legislature, House District 35 - Paul Seaton (703) Citizens' Advisory Commission on Federal Areas - Stan Leaphart (633) City of Houston - Roger Purcell (455) Conservative Patriots Group - Calli Donn (282) Conservative Patriots Group - Calli Donn (290) Cook Inlet Tug & Barge Co. - Bradley Kroon (603) Cook Inlet Tug & Barge Co. - Carl Anderson (40) Energy API - Richard Ranger (701) Kenai Peninsula Fishermen's Association - Paul Shadura II (336) Kenai Peninsula Fishermen's Association - Paul Shadura II (788) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) MAP Consulting, LLC - Mary Ann Pease (698) National Ocean Industries Association - Jeffrey Vorberger (669) State of Alaska - Sean Parnell (755) The Pebble Partnership - Charlotte MacCay (447)
REG 2	Law Office of Dane E. Johnson, LLC - Dane Johnson (7)
REG 3	Janet Sack (457) John Strassenburgh (474) Margi Clifford (683) Michael Rasy (459) Nancy Lord (359) Sue Mauger (737) Timothy M Sczawinski (59) Valerie Fletcher (135534) Alaska State Chamber of Commerce - Wayne Stevens (365) Audubon Alaska - John Schoen (310) Audubon Alaska - John Schoen (743) Center for Water Advocacy - Nikos Pastos (329) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (312) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487)
REG 4	Robert K Wall (208) Thomas Rothe (483) Alaska SeaLife Center - Ian Dutton (641) Center for Water Advocacy - Harold Shepherd (152) Kenai Peninsula Fishermen's Association - Paul Shadura II (788) Municipality of Anchorage - Daniel Sullivan (19) Native Village of Tyonek - Angela Sandstol (699)
REG 5	Export Council of Alaska - Anthony Follett (109) Kenai Peninsula Borough Clerk's Office - Pete Sprague (88) Matanuska-Susitna Borough - Cheryl Marino (130) MatSu Business Alliance - Kay Slack (201) Municipality of Anchorage - Daniel Sullivan (19) Municipality of Anchorage - Daniel Sullivan (202) Resource Development Council for Alaska, Inc. - Jason Brune (25) State of Alaska - Sean Parnell (755) Tyonek Native Corporation - Michaelene Stephan (438) United States Air Force, Western Regional Environmental Office - Mary Lamb (90)

SOC	Organization and Individuals
REG 6	Export Council of Alaska - Anthony Follett (109) MatSu Business Alliance - Kay Slack (201) Municipality of Anchorage - Daniel Sullivan (20) Resource Development Council for Alaska, Inc. - Jason Brune (26) Tyonek Native Corporation - Michaelene Stephan (438)
REG 7	Bob Doyle (196) Denette Justus Romano (76)
REG 8	Totem Ocean Trailer Express, Inc. - Greg Kessler (498) Totem Ocean Trailer Express, Inc. - Phil Morrell (715)
REG 9	Brad Faulkner (146) Roger Jenkins (790) Whittaker Jed (289) Conservative Patriots Group - Jennie Bettine (285)
REG 10	Bruce D Webb (595) Carl Portman (177) Gina Poths (346) John Zager (621) Alaska Earth Sciences - Robert Retherford (627) Alaska State Chamber of Commerce - Caroline Higgins (298) Alaska State Legislature, House District 35 - Paul Seaton (703) Alaska State Legislature, House of Representatives - Charisse Millett (357) Citizens' Advisory Commission on Federal Areas - Stan Leaphart (633) ConocoPhillips Alaska, Inc. - Dan Clark (754) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) PacRim Coal, LP - Daniel Graham (135544) State of Alaska - Sean Parnell (755) The Trust Land Office - Marcie Menefee (748)
REG 11	Rena Wall (199) Rena Wall (206) Robert K Wall (181) Robert K Wall (200)
REG 12	Unknown (444) Bob Pawlowski (303) Bruce D Webb (595) Darin Markwardt (296) Heinrich Springer (694) J Dennis Stacey (787) Jeffery G Knauf (114705) Jerome Birch (656) Julius Charles Reardon (364) Kevin Greenfield (692) Roger Jenkins (790) Timothy Breeden (294) Whittaker Jed (289) Ame Wieland (340) Heinrich Springer (629) Alaska Department of Fish and Game - Douglas Lang (316) Alaska Earth Sciences - Robert Retherford (627) Alaska Maritime Agencies - Robert Arts (108) Alaska Miners Association - Steven Borell (727) Alaska Natural Gas Transportation Projects - Thomas Barrett (490) Alaska Railroad Corporation - Bruce Carr (606) Alaska State Chamber of Commerce - Caroline Higgins (298)

SOC	Organization and Individuals
	<p>Alaska State Legislature, House of Representatives - Charisse Millett (357) Alaska State Legislature, Legislative Affairs Agency - Jeff Turner (697) Anchorage Chamber of Commerce - Sami Glascott (510) CGGVeritas Land (US) Inc. - Scott Nish (721) City of Houston - Roger Purcell (455) City of Kenai - Rick Koch (709) ConocoPhillips Alaska, Inc. - Dan Clark (754) Conservative Patriots Group - Jennie Bettine (285) Cook Inlet Tug & Barge Co. - Bradley Kroon (603) Energy API - Richard Ranger (701) Export Council of Alaska - Anthony Follett (352) Kenai Peninsula Fishermen's Association - Paul Shadura II (336) Kenai Peninsula Fishermen's Association - Paul Shadura II (788) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) MAP Consulting, LLC - Mary Ann Pease (332) MAP Consulting, LLC - Mary Ann Pease (698) Matanuska-Susitna Borough - Dana Duffy (679) MatSu Business Alliance - Kay Slack (201) MatSu Business Alliance - Kay Slack (739) Municipality of Anchorage - Daniel Sullivan (751) National Ocean Industries Association - Jeffrey Vorberger (669) Resource Development Council for Alaska, Inc. - Jason Brune (763) Senator Mark Begich's Office - Kim Howard (166) Senator Mark Begich's Office - Kim Howard (173) State of Alaska - Sean Parnell (755) Stellar Oil & Gas, LLC. - James Watt (757) Temsco Helicopters Inc. - Joe Hicks (747) The Laughlin Company, LLC. - Kaye Laughlin (658) The Pebble Partnership - Charlotte MacCay (447) Totem Ocean Trailer Express, Inc. - George Lowery (299) Tyonek Native Corporation - Tom Harris (626) United States Senate - Mark Begich (717)</p>
REG 13	<p>Carol Jo Sanner (70) David Lee (460) J Dennis Stacey (787) Jeff Childs (653) Julian Massey (318) Julius Charles Reardon (364) Larry K Daniels (662) Mike Bloechl (145) Ronald Ted Stanek (661) Alaska Miners Association - Steven Borell (727) Alaska SeaLife Center - Ian Dutton (641) City of Houston - Roger Purcell (455) Cook Inlet Tug & Barge Co. - Bradley Kroon (603) Cook Inlet Tug & Barge Co. - Carl Anderson (40) Kenaitze Indian Tribe - Rose Tepp (617) MatSu Business Alliance - Kay Slack (739)</p>
REG 14	<p>Chief Paul Theodore (292) Heather McCausland (284) Center for Water Advocacy - Nikos Pastos (329) Cook Inlet Marine Mammal Council - Delice Calcote (114706) Friends of the Anchorage Coastal Wildlife Refuge - Barbara Švarný Carlson (487) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738)</p>

SOC	Organization and Individuals
REG 15	Jeffery G Knauf (114705) ConocoPhillips Alaska, Inc. - Dan Clark (754) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) Marine Mammal Commission - Tim Ragen (114713) Resource Development Council for Alaska, Inc. - Jason Brune (306) Resource Development Council for Alaska, Inc. - Jason Brune (763) The Pebble Partnership - Charlotte MacCay (447)
REG 16	Conservative Patriots Group - Jennie Bettine (285)
REG 17	James Leonard (501)
REG 18	Bruce D Webb (595) ConocoPhillips Alaska, Inc. - Dan Clark (754) Export Council of Alaska - Anthony Follett (352) State of Alaska - Sean Parnell (755)
REG 19	Nicole Sperbeck (115) Vernon W Rush (768) ConocoPhillips Alaska, Inc. - Dan Clark (754) Knik Arm Bridge and Toll Authority - Andrew Niemiec (317) Knik Arm Bridge and Toll Authority - Andrew Niemiec (738) PacRim Coal, LP - Daniel Graham (135544) Port of Anchorage - Stephen Ribuffo (628) United State Coast Guard - Edward F Wandelt (681)
REG 20	Cook Inletkeeper - Bob Shavelson (643) Marine Mammal Commission - Tim Ragen (114713)
REG 21	ConocoPhillips Alaska, Inc. - Dan Clark (754) Resource Development Council for Alaska, Inc. - Jason Brune (763)
REG 22	Bob Shavelson (161) Carol D Bevis (500) Elise Wolf (169) Alaska SeaLife Center - Ian Dutton (641) Center for Biological Diversity - Rebecca Noblin (722) Cook Inlet Marine Mammal Council - Delice Calcote (295) Kachemak Bay Conservation Society - Elise Wolf (759) Kachemak Bay Conservation Society - Roberta Highland (468) Trustees for Alaska - Brian Litmans (756)
REG 23	Kenai Peninsula Fishermen's Association - Paul Shadura II (788) State of Alaska - Sean Parnell (755)
REG 24	Bruce D Webb (595) Jerry McCutcheon (791) Rena Wall (199) Thomas Rothe (483)
REG 25	Bruce D Webb (595) Export Council of Alaska - Anthony Follett (352) Tyonek Native Corporation - Tom Harris (626)
REG 26	ConocoPhillips Alaska, Inc. - Dan Clark (754)
REG 27	State of Alaska - Sean Parnell (755)
REG 28	State of Alaska - Sean Parnell (755)
REG 29	State of Alaska - Sean Parnell (755)
REG 30	State of Alaska - Sean Parnell (755)
REG 31	State of Alaska - Sean Parnell (755)
REG 32	State of Alaska - Sean Parnell (755)
REG 33	State of Alaska - Sean Parnell (755)

SOC	Organization and Individuals
REG 34	State of Alaska - Sean Parnell (755)
REG 35	State of Alaska - Sean Parnell (755)
REG 36	United Cook Inlet Drift Association - Roland Maw (209)
REG 37	Theodore N Bailey (428)
REG 38	Trustees for Alaska - Brian Litmans (756)