



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT &
PERMITTING

550 West Seventh Avenue, Suite 1430
Anchorage, Alaska 99501
Main: 907.269.8690
Fax: 907.269.5673

April 30, 2013

Rick Obernesser, Superintendent
Wrangell-St. Elias National Park and Preserve
P.O. Box 439
Copper Center, AK 99573-0439

Dear Mr. Obernesser:

The State of Alaska reviewed the Kennecott Operations Plan and Environmental Assessment (EA), which addresses management of the Kennecott Mines National Historic Landmark (NHL) in the Wrangell-St. Elias National Park and Preserve. The following comments represent the consolidated views of the State's resource agencies.

We commend the Service for its collaborative efforts to involve the local community and other stakeholders in the development of this plan, and the extensive outreach intended to obtain public input at various stages of the planning process. The plan reflects the strong historical and contemporary connection between the community and the NHL, and appears responsive to the management concepts outlined by the local community and Friends of Kennecott. We also appreciate the plan recognizes the value that the Alaska National Interest Lands Conservation Act local hire provision has had on park programs, particularly in the McCarthy/Kennecott area, and the Service's continued commitment to look for additional local hire opportunities.

We support the construction of a campground in the McCarthy area and recognize public input will be solicited prior to a final determination of site location. Campground facilities, such as bear-resistant trash receptacles and food storage boxes will help minimize bear human conflicts. However, the plan indicates that due to the presence of an abundance of soapberry bushes in the proposed location, the campground may need to be closed during July and August when bears are feeding in preparation for hibernation. Given the limited visitation window for the McCarthy/Kennecott area and July and August being high visitation months, we question whether the proposed location is appropriate. Alternatively, to avoid a campground closure, the Service should evaluate the availability of soapberries throughout the general area and consider clearing the campground vicinity of the attracting vegetation. In addition, we recommend considering if there is another viable location closer to the footbridge. Transporting camping equipment approximately two miles from the parking area and footbridge may be challenging for

some visitors, including those who are physically unable to carry the needed equipment, and could also preclude use of the campground.

The EA contains inaccurate information regarding permitting requirements for construction-related storm water discharge. The Environmental Protection Agency (EPA) transferred the authority to administer the Storm Water Program to the Alaska Department of Environmental Conservation (DEC), under the state's Alaska Pollutant Discharge Elimination System Program (APDES) on October 31, 2009. Since that time EPA has had no authority to issue a Storm Water Permit to a facility where jurisdiction has transferred to the State (Denali National Park and the Annette Islands Indian Reservation (Metlakatla) are the only areas of the State that remain subject to EPA authority). Please submit an electronic Notice of Intent (NOI) to ADEC prior to initiation of construction activities

(<http://www.dec.alaska.gov/water/wnpssc/stormwater/APDESeNOI.html>) and prepare the Storm Water Pollution Prevention Plan in accordance with ADEC's General Permit (GP) Number AKR100000, Storm Water General Permit for Large and Small Construction Activities. The GP can be found

at: http://www.dec.alaska.gov/water/wnpssc/stormwater/docs/2011_ACGP_20110519_wapp.pdf

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In addition, when designing the drinking water systems, please consult with ADEC's Division of Environmental Health regarding the need for plan approvals. When designing the sewer systems, please consult with ADEC's Division of Water in Wasilla for the sanitary sewer system and any permanent storm water disposal systems.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

/ss/

Susan Magee

ANILCA Program Coordinator

