



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

## ANILCA Implementation Program

OFFICE OF PROJECT MANAGEMENT & PERMITTING

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July 1, 2013

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

Dear Mr. Obernesser:

The State of Alaska reviewed the Shamrock Group Mining Plan of Operations (MPO) Environmental Assessment (EA), which evaluates granting an Alaska National Interest Lands Conservation Act (ANILCA) Right-of-Way Certificate of Access to unpatented mining claims, within Wrangell-St. Elias National Park and Preserve, and approving a mining plan of operations for suction dredge and highbanker placer gold mining in the Gold Hill/Bonanza Creek area. The following comments represent the consolidated views of the State's resource agencies.

ANILCA established a right of access for economic and other purposes to inholdings within or effectively surrounded by conservation system units and other areas designated by the Act. The State is generally supportive of the proposed action, which would grant ANILCA Section 1110(b) access and authorize operations on unpatented, previously mined, mining claims on and around Bonanza Creek and its floodplains. The MPO also includes maintenance and repair of historic structures consistent with the *Secretary of Interior Standards for the Treatment of Historic Properties* for use as the mine support camp.

We appreciate the EA indicates the proposed MPO must also comply with state regulations. We request the applicant be advised to contact the Alaska Department of Environmental Conservation prior to the start of operations to obtain the appropriate wastewater discharge permit (likely General Permit AKG375000 for small size suction dredge placer mines). We also request the Service notify the State of any significant changes to the MPO.

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

cc: Bruce Rogers, NPS/WRST