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October 6, 1986

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

Dear Mr. Evison:

This letter is in response to National Park Service (NPS) preparation of **Mineral Management Plans** (MMPs) and Environmental Impact Statements (EISs) for Denali National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve (as announced in the May 7, 1986 Notice of Intent in the Federal Register). We are providing the following comments to help ensure that these efforts address a range of issues of concern to the state. These comments are submitted on behalf of state agencies and represent a consolidation of agency viewpoints.

The State of Alaska appreciates the opportunity provided state agency representatives on September 17 in Anchorage and September 18 in Fairbanks to meet with MMP/EIS team members. The comments which follow are intended to supplement verbal comments offered by agency representatives during the two scoping meetings. While many of the comments at these meetings stressed the economics of mining in Alaska and the need to consider and provide for the challenges inherent in mining in Alaska, many of the written comments provided here focus on state/federal cooperation and methods to assess the biological impacts of mining. We hope they will be of use to the NPS and look forward to continued contact and consultation with the NPS as the EIS process continues.

As was discussed at the Anchorage meeting, one of our overall concerns is that the NPS has proceeded with data collection in each of the three units before initiating a formal scoping process. We understand NPS's need to collect data during the summer months, however, the National Environmental Policy Act (NEPA) and its implementing regulations (specifically, 40 CFR - Part 1501.7) require the NPS to consult with interested parties as soon as practicable after the decision to prepare an EIS is made. The state regrets that scoping did not occur before field work in support of the EISs was initiated and requests that, in the future, NPS consult with the state and public before

investing resources in EIS data collection. This would better ensure that data needed to assess all significant issues, including any the NPS may have overlooked, is collected.

As was also discussed at the Anchorage scoping meeting, we are interested in assuring that staff working on the EISs have extensive knowledge of mining conditions in Alaska and the technologies and procedures that have been developed in response to these unique conditions. As NPS staff are aware, Alaska's short mining season, cold waters, and permafrost, in addition to such factors as limited access, make mining in Alaska different and often more difficult than mining elsewhere. For instance, reclamation in Alaska can frequently be better accomplished at the beginning of the mining season than at the end; delivery of supplies is often confined to the winter months; considerably more "muck" is produced because of permafrost conditions; and settling time is slower and flocculants more difficult to use because of Alaska's cold waters. Because of these and other differences, the state encourages the NPS to work as closely as possible with local mining experts, including industry and state representatives.

We note, in addition, that the Alaska Departments of Natural Resources (DNR) and Environmental Conservation (DEC) have a report available which summarizes the results of the 1985 DNR/DEC Placer Mining Demonstration Grant Project. Attached is a copy of this report. Resource information which may also be of assistance to the NPS is available in the Alaska Department of Fish and Game's (DFG) Habitat Management Guides. Marianne See of the DFG (267-2300) can be contacted for more information on the Habitat Management Guides.

In addition to the above general concerns, the state recommends that the EISs address the following specific issues and information. (Numbers are for convenience only and do not indicate relative importance. Comments apply to existing and/or anticipated conditions, as appropriate.)

1. Include current land status on maps in documents. The maps and legends should acknowledge state ownership and management of shorelands, tidelands, submerged lands, and other state lands.
2. Include assurances that any management decisions will maintain opportunities for the DFG to conduct necessary habitat improvement or population projects (e.g., in response to or as mitigation for mining activities), including access needed for such activities.
3. As appropriate, identify the state's authorities, regulatory processes and procedures, and provide for

- cooperative enforcement of applicable laws and regulations (e.g., DFG species management policies and plans, Anadromous Stream Act, Alaska Water Quality Standards, Alaska Coastal Management Program).
4. Identify, as appropriate, cooperative agreements with the state and other managers to manage special areas, recognizing that the Master Memorandum of Understanding between the DFG and the NPS (1982) states NPS' intention to consult with DFG prior to entering into any land management agreements.
 5. Involve DFG staff in population data collection and assessments or interpretations, as appropriate.
 6. Address Alaska Native Claims Settlement Act Section 17(b) easements and possible Revised Statute 2477 rights-of-way. The state is concerned about existing or potential use of the easements and rights-of-way for access to mining areas. In addition, the state urges the NPS to consider access corridors to mining areas activity as more than just trails, as they are now considered. Access to such areas needs to be of adequate size and design in order to allow for the movement of equipment, supplies, building materials, etc. If this is not done, the continued use of oftentimes inadequate access for large loads may cause more vegetative and terrain alteration than if adequate access had been provided for in advance.
 7. Address the topic of water appropriation for mining, including acknowledgement of Alaska Statutes 46.15.010 and 45.15.180, which relate to use of waters in the state. (Miners must obtain a permit to appropriate water from the DNR, Division of Land and Water Management, if their activity requires use of water).
 8. Assess the degree and magnitude of stream channel alteration, including past and anticipated restoration, if any.
 9. Identify overland access patterns. Address the degree and magnitude of overland access to mine locations including amount of habitat disturbance, degree of restoration, and current site conditions.
 10. Describe riparian and wetland habitat disturbances, degree of disturbance, existing conditions, and amount of present restoration.

11. Describe water quality, including background water quality compared to water quality conditions during active mining in the past and current conditions of streams (to be compared with existing state water quality standards), and the amount of resuspension of sediments occurring presently without active mining.
12. Address displacement or attraction of wildlife (artificial food sources, noise, visual, aircraft), number of past occurrences involving human/carnivore conflicts, and number of animals lost.
13. Describe solid waste management, and existing conditions at sites.
14. Discuss the presence and management of petroleum products (handling, disposal, spills, etc.).
15. Describe hydrological alterations to waterbodies (flow conditions, changes in surface patterns, subsurface/surface flow changes, seasonal variations, etc).
16. Describe any known chemical contamination, e.g., heavy metals, arsenic.
17. Evaluate past effects on the distribution and abundance of fish and wildlife species, e.g., changes in fish distribution and use.
18. Describe human use of fish and wildlife in areas of mining and address the possible impacts to such use from mining and its associated activities. The state encourages the NPS to gather information on community resource use, as presently there is a minimal amount of information on this subject available. The DFG is interested in exploring opportunities for cooperative data collection.

Of the three EIS project areas, the best documentation of community use of fish and wildlife resources is for the Copper River Basin, including portions of the Wrangell-St. Elias Park and Preserve. Jim Fall of the DFG Anchorage office (267-2359) can be contacted directly about the data obtained from this project.

Comments Which are Specific to Wrangell-St. Elias:

19. Address ways to mitigate water quality problems occurring in certain high energy streams. For example, floodwaters in the Nizina watershed in the area of Spruce Point Creek, Trumpeter Creek, Dan Creek, and May

Creek cause runoff down trails used by heavy equipment. This has resulted in downstream siltation of areas near sockeye and coho salmon spawning areas.

20. Describe the impacts of and possible mitigation measures for siltation of drainages which are occupied by resident fish, such as Dolly Varden. This may apply to all drainages within Wrangell-St. Elias that are relatively clear and flow year-round.

In closing, we reiterate our appreciation of efforts made by the NPS to solicit state input. The state looks forward to continued cooperation with the NPS and urges EIS team leaders to contact state agency staff and/or this office as appropriate throughout the preparation of the MMPs and EISs.

Sincerely,



Michelle Sydeman
CSU Coordinator

cc: Senator Rick Halford, CACFA, Fairbanks
Commissioner Collinsworth, DFG, Juneau
Commissioner Knapp, DOT/PF, Juneau
Commissioner Ross, DEC, Juneau
Commissioner Wunnicke, DNR, Juneau
Robert L. Grogan, DGC, Juneau

- [1272] Mr. Mike Abbott, Resource Development Council, Anchorage
- [1311] Mr. Bill Allen, Fairbanks
- [1317] Dr. Robert Baker, Anchorage
- [1312] Mr. James Barkeley, Esq., Anchorage
- [1037] Ms. Joyce Beelman, Department of Environmental Conservation, Fairbanks
- [1] Mr. Jay Bergstrand, Department of Transportation and Public Facilities, Anchorage
- [994] Ms. Bonnie Borchick, Department of Commerce and Economic Development, Juneau
- [1292] Mr. Frederick O. Eastaugh, Juneau
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- [1243] Mr. Robert D. Heath, Alaska Power Authority, Anchorage
- [1244] Mr. Robert Henderson, Department of Public Safety, Anchorage
- [1271] Ms. Sharon Jean, Alaska Land Use Advisors, Soldotna
- [1297] Mr. Arthur Kennedy, Anchorage
- [1298] Dr. John Choon Kim, School of Business & Pub. Affairs University of Alaska, Anchorage
- [1270] Mr. Larry Kimball, Alaska Federation of Natives, Anchorage
- [1250] Mr. Stan Leaphart, Citizens Advisory Commission on Federal Areas, Fairbanks
- [1258] Mr. Craig Lindh, Juneau Office of Management & Budget
- [946] Mr. Ron McCoy, Alaska Land Use Council, Anchorage
- [594] Ms. Mary Nordale, Commissioner, Department of Revenue, Juneau
- [1314] Mr. Vernon R. Olson, Anchorage
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- [1372] Ms. Marianne See, Department of Fish and Game Division of Habitat, Anchorage
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