

STATE OF ALASKA

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ANILCA IMPLEMENTATION PROGRAM

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June 3, 2005

Colleen Matt
Natural Resources Coordinator
Lake Clark National Park and Preserve
4230 University Drive, Suite 311
Anchorage, AK 99608-4626

Dear Ms. Matt:

The State of Alaska reviewed the Environmental Assessment (EA) for the proposal to construct a backcountry ranger station, two outhouses, and a potable water system at the Silver Salmon Creek ranger station site in Lake Clark National Park and Preserve. This letter contains the consolidated comments of the State's resource agencies.

Subsistence

The EA references subsistence uses only in the ANILCA Section 810 analysis in Appendix B. The analysis concludes that "No significant reductions in populations of subsistence fish and wildlife resources are anticipated as a result of the proposed action." This conclusion is based on the premise that: "Silver Salmon Creek is primarily a sport fishing destination and very little subsistence activity takes place on park lands in the area." In view of the relatively long distance of the ranger station site from local communities and small amount of land impacted by the project, we concur with this assessment.

However, the Service can strengthen the 810 analysis by specifically referencing which park resident zone communities or Section 13.44 permittees conduct subsistence activities in the area, rather than making only a general statement. The analysis also indicates that no subsistence harvest data are available for residents of Chinitna Bay and Silver Salmon Creek, which suggests that local rural residents with 13.44 permits may be living at or near the project site. If that is the case, a more complete 810 analysis is needed to describe subsistence uses by these local rural residents, since they would likely be most affected by project-related impacts. However, based on the information presented in the 810 analysis, it is unlikely that the project will detrimentally affect their subsistence uses of the project area.

Page 14, Summary Table of Alternative Impacts, 5. Water Quality and Fish
Pages 27-28, 4.6 Effects on Water Quality and Fish.

We recommend the Service clarify that the Alaska Department of Fish and Game manages the sport fishery at Silver Salmon Creek and that Service employees are involved in monitoring human uses associated with the fishery.

Please contact me at (907) 269-7529 or by email at susan_magee@dnr.state.ak.us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator