

STATE OF ALASKA

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May 5, 2006

Steve Hunt
Environmental Protection Specialist
Wrangell-St. Elias National Park and Preserve
P.O. Box 439
Copper Center, AK 99573

Dear Mr. Hunt:

The State of Alaska reviewed the Environmental Assessment (EA) for the St. Elias Erosion and Tectonics Project, proposed by the Alaska Earthquake Information Center, which addresses expanding the seismic monitoring station network in Wrangell-St. Elias National Park and Preserve (WRST). The following comments represent the consolidated views of State resource agencies.

The State is supportive of the need for additional seismic stations in the WRST network. This region is one of the most complex tectonic areas in Alaska, where interaction between the Pacific and North American plates make the transition from strike-slip to subduction environments. Also, large glaciers in the region and their rapid retreat result in an additional complex set of stresses on the crust. Understanding the interaction of these surficial processes with the tectonics of the area, as well as the plate interactions, will greatly improve our understanding of earthquake processes in this region and the rest of the state, allowing for improved assessments of seismic hazards. As the Totschunda fault is also a very likely location for the next major earthquake on the Denali system, we support the maximum number of seismic stations as reflected in Alternative "C". These additional stations will enhance the ability to monitor earthquakes and accurately locate causative faults. According Table 2-2 in the EA, the environmental effects cited for both action alternatives are similar. As such, implementing Alternative "C" will maximize the effectiveness of the project without significantly contributing to further environmental impacts. We appreciate that the National Park Service (Service) recognizes the value of gathering this important data relative to the negligible impacts of these passive seismic stations on resources and values of the park.

The EA does not discuss subsistence activities that might be occurring in areas where the new seismic monitoring stations would be located. The Alaska National Interest Lands Conservation Act (ANILCA), Section 810 analysis only provides general statements regarding areas where subsistence hunting occurs in the park unit and refers readers to other Service documents for more information about subsistence uses. Although we don't

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believe this proposal poses any potential conflicts with subsistence uses, as a general rule we question the adequacy of an 810 analysis that does not present at least general information about subsistence activities in area(s) affected by the proposed action. In this case, referring readers to 1986 General Management Plan (GMP), the 1988 Wilderness Environmental Impact Statement (EIS), and the WRST Subsistence Plan, which is updated annually, is problematic for three reasons: (1) some reviewers may not have access to these documents; (2) the GMP and Wilderness EIS are dated and don't contain subsistence use data collected since they were published in 1986 and 1988, respectively, and (3) the Subsistence Plan is essentially an ongoing record of actions taken by the WRST Subsistence Resource Commission pursuant to its mandates, and contains little, if any, specific information about areas used for subsistence purposes within the park unit. We recommend that future 810 analyses be strengthened by including at least a short description of the subsistence activities, if any, occurring in the affected areas.

Thank you for this opportunity to comment.

Sincerely,



Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator