

BILL SHEFFIELD, GOVERNOR

CSU Planning Office  
333 Raspberry Road  
Anchorage, AK 99502

267-2215

18 July 1983

Mr. Wayne Boden  
Anchorage District Manager  
Bureau of Land Management  
4700 East 72nd Avenue  
Anchorage, AK 99507

Dear Mr. Boden:

We have received the following additional comments on the draft Forty-mile River Management Plan. These comments have been determined to be consistent to the other comments we have provided from the State Contacts for Conservation System Unit (CSU) planning. Please consider them as an addendum to our review letter of 10 June 1983.

Specific Comments

Page 32, paragraph 1: Even though it may be only preliminary and non-binding, the Bureau of Land Management (BLM) finding that the Fortymile River system is navigable only from the Canadian border to Steele Creek seems extremely conservative. Much of the Forty-mile River system has a history of use for access to mining, trapping, residential use, recreational use, etc. It can be expected to continue to be used for such access.

Page 44, Surface Transportation: This section should address the Alaska Department of Transportation and Public Facilities current effort to upgrade the Taylor Highway from Tetlin Junction to the Canadian border. It should also address the possibility of upgrading the Eagle Spur. This will be especially important along Wade Creek because of its designation as recreational. That designation will make right of way acquisition for even minor realignment along Wade Creek subject to the prudent and feasible test of Section 4(f) of the Department of Transportation Act of 1966, as amended.

Page 68, Water Quality, Action 3.2. The third sentence would read better if written: "Plans that do not show every reasonable attempt to achieve the State's water quality standards will not be approved."

The discussion section should be rewritten. Flushing settling ponds would require a special variance to the required wastewater discharge permit.

A possible wording for the discussion section would be: "Alaska Water Quality Standards must be met on all streams receiving discharges from mining operations. Possible methods to achieve this goal include construction of substantial settling ponds, impervious pond liners and recirculation of water. If terrain or other site specific conditions prohibit the use of adequate wastewater treatment, then mining in such areas should be prohibited."

The Alaska Department of Environmental Conservation would like to be included in the planning stages of any future facilities development. These concerns include wastewater and solid waste disposal. The State also hopes to continue work with BLM and the mining community in the Fortymile area to minimize water impacts from mining discharge effluents.

Page 71, Action 6.2. No. 2. The state allows up to six inch diameter suction dredging on streams without a permit. We request an explanation of BLM's requirement of less than 5 inch diameter dredge intakes on non-navigable streams.

Page 72, Action 6.2. No. 4. Please explain how sound level limits will be enforced.

Page 75, No. 5. The sentence should be rewritten since it is the receiving water not the effluent which must meet State Water Quality Standard Regulations.

Thank you again for the opportunity to participate in your agency's planning. Please do not hesitate to contact us if you have any questions regarding this addendum.

Sincerely,

Tina Cuning  
State CSU Assistant

cc: M. Green, ELM  
L. Parker, ALUC  
R. Foster, CACFA  
State CSU Contacts