

STATE OF ALASKA

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June 29, 2001

Mr. Steve Carwile, Compliance Officer
Denali National Park and Preserve
Backcountry Management Plan
P.O. Box 9
Denali Park, AK 99755

Dear Mr. Carwile:

The State of Alaska has reviewed the Denali National Park and Preserve Environmental Assessment (EA) that evaluates the impacts of reclaiming and restoring about 517 acres of mining-disturbed floodplain and wetlands in 10 Kantishna area drainages. We appreciate this review opportunity and the Service's continuing efforts to integrate State involvement in national park planning. We generally concur with the EA's conclusions, but would prefer more detail in some sections.

Resource Protection

To establish baseline conditions, develop restoration designs that mimic natural conditions, and evaluate proposed impacts to aquatic and terrestrial resources, the Finding of No Significant Impact (FONSI) should include more detailed information than the EA does regarding stream characteristics and aquatic resources. This information could also be used to determine optimal times for minimizing impacts and avoiding peak flows while performing instream restoration activities.

Detailed information about stream characteristics should include available historical data on stream flow, hydraulics, and channel morphology. Detailed information about aquatic resources should include any available habitat inventories of the affected streams, including species of fish present and their life phases, distribution and periodicity.

We recommend that the Service apply to the Alaska Department of Natural Resources for Water Rights in order to protect resource values, which may include fish and wildlife, water quality, recreation and navigation, and to protect the public's investment in reclamation and restoration efforts.

Access and Service/State Cooperation

We recognize that future active mining in the Kantishna area is unlikely. However, Title XI of the Alaska National Interest Lands Conservation Act (ANILCA) requires the Service to allow reasonable access for mining and for other non-mining uses of patented claims. Completion of reclamation work should not preclude subsequent inholder access through these areas.

We encourage the Service to work closely with the State's Abandoned Mine Lands program, which coordinates with other agencies to reclaim old mine sites.

Thank you again for the opportunity to comment. We look forward to receiving a copy of the FONSI.

Sincerely,

/s/

Tom Atkinson
Project Review Coordinator

cc: Tina Cuning, ADF&G
Johanna Munson, ADNR