

# STATE OF ALASKA

## OFFICE OF THE GOVERNOR ANILCA IMPLEMENTATION PROGRAM

**FRANK H. MURKOWSKI**  
**GOVERNOR**

550 W. 7<sup>TH</sup> AVENUE, SUITE 1660  
ANCHORAGE, ALASKA 99501  
PH: (907) 269-7477 / FAX: (907) 269-3981  
[Sally\\_Gibert@gov.state.ak.us](mailto:Sally_Gibert@gov.state.ak.us)

June 21, 2003

Gary Candelaria  
Superintendent  
Wrangell-St. Elias National Park and Preserve  
P.O. Box 439  
Copper Center, AK 99573

Dear Mr. Candelaria:

The State of Alaska has reviewed the National Park Service Environmental Assessment (EA) addressing the Interim Park Operations Support Complex for the Kennicott District of the Wrangell-St. Elias National Park and Preserve. This letter represents the consolidated comments of interested State agencies.

The State generally concurs with the compelling need to establish an area for material staging and storage, along with caretaker and **limited, temporary** employee/contractor housing and associated facilities. The State is concerned, however, about isolating housing for up to 15 longer term employees away from the Kennicott National Historical Landmark. We believe there are substantial advantages, addressed below, for contractors or seasonal employees who expect to work on-site for more than a week or two to be housed closer to or within the Kennicott Landmark developed area. This alternative was not mentioned or considered in the EA.

The EA also does not address the potential for partnering with local businesses or organizations in either Kennicott or McCarthy on the development of seasonal employee housing. Inexpensive seasonal housing is a concern that is not unique to park employees, and some creative partnering with the community could serve multiple interests.

The EA states that most of the work will take place during "summer 2003"; yet the *Consultation and Coordination* section does not indicate there has been any local involvement in the alternative development or decision process. A commitment to such meaningful consultation is an integral component of the Interim Operations Plan (Appendix A). We urge the Service to follow through with this commitment before proceeding – especially the housing component. Additional questions or concerns raised in the State's review include:

- There is little discussion and no mapped information about land status in the affected area, which hampers the ability to understand and comment on how the proposed facilities may affect area landowners and businesses. Has the Park consulted with adjacent landowners?

- What is the timeframe for expected use of the proposed “interim” facilities?
- The costs of the project are not included – an unusual omission for such an EA – especially since one of the reasons for the proposal is related to cost savings. The “no action” alternative states the Park would continue to spend \$40,000 in annual housing rental costs. The preferred alternative says the Park will save \$40,000 annually in housing costs; yet the “Purpose and Need” section indicates that “NPS would continue to use all available options for housing regardless” (presumably a reference to the private housing market). Based on these statements it is not clear how much or if the Park expects to continue the use of leased or rented housing during the life of the plan.
- The Interim Operations Plan discusses the longer term possibility of housing employees (and perhaps other functions) in existing historic structures within the Landmark, such as the West Bunkhouse. How does the EA mesh with this intent? Housing local employees within the Landmark is consistent with the historic use of Kennicott structures as well as the adaptive use philosophy supported by the Park and the community.
- Housing longer term employees on the west side of the Kennicott River would unnecessarily add to the growing “commute traffic” on the pedestrian bridge and the narrow road to Kennicott. This is not addressed in the EA.
- Will gravel be needed? If so, from what sources?
- The “Wildlife” section under “Affected Environment” indicates that *“park visitors were involved in approximately 30 human-bear conflicts during the years 2000 and 2001.”* Is this actually a reference to all local human-bear conflicts? Many problems in recent years have involved local residents, not just “visitors.”
- The McCarthy Road Roundtable Project is mentioned in the text and in several tables, yet it is not included among the References Cited.

Finally, housing a number of longer-term non-local employees in a self-contained housing enclave relatively distant from community mixing points would exacerbate the potential for social division within the community. The Park has made some important strides to diffuse the “us vs. them” mentality by maximizing local hire and using some local housing rentals. We encourage the Park to work with the community on options and alternatives that meet the Service’s needs and are sensitive to local concerns.

Thank you for your consideration. If you have any questions, please call me at 269-7477.

Sincerely,

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Sally Gibert  
State ANILCA Coordinator