

STATE OF ALASKA

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

SARAH PALIN, Governor

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March 21, 2008

Will Meeks, Deputy Refuge Manager
Alaska Maritime National Wildlife Refuge
95 Sterling Highway, Suite 1
Homer, Alaska 99603

Dear Mr. Meeks:

The State of Alaska received the Environmental Assessment (EA) and draft Compatibility Determination regarding a proposal from the University NAVSTAR Consortium, Inc. (UNAVCO) to install and maintain high-precision geodetic monitoring stations on the Alaska Maritime National Wildlife Refuge. Except for a response from the Division of Coastal and Ocean Management relative to the Alaska Coastal Management Program, the following comments represent the consolidated views of the State's resource agencies.

The State is highly supportive of the Plate Boundary Observatory Project and this proposal to add four continuously-operating global positioning system (GPS) stations and one seismometer to the Alaska network. This program will provide important and otherwise unattainable information that will aid the State and others in understanding the driving forces behind hazardous earthquakes. We also appreciate the Service's efforts to work with UNAVCO to facilitate permitting for these additional sites.

We are concerned, however, about the omission of a GPS station within designated Wilderness from the proposal. The EA states on page 5 that *"Ideally, a GPS station would have been placed on one of the Semidi Islands, but these islands were avoided because they are designated wilderness areas."* Given the limited discussion it is unclear if or how the omission of this location will affect the project's overall effectiveness. It would be unfortunate if the decision was made without fully exploring the allowances within the Wilderness Act and the Alaska National Interest Lands Conservation Act (ANILCA) that supported the placement of several other GPS stations within designated Wilderness in Alaska, as referenced in Section 1.4 on page 7 of the EA. ANILCA Section 101(b) particularly recognized the value of maintaining scientific research opportunities in conservation system units, which includes designated Wilderness. If the Semidi Island site is considered an "ideal" location as indicated, we strongly encourage the Service to work with UNAVCO to evaluate whether the additional site could similarly be

accommodated to maximize the project's intended purpose and effectiveness. For reference purposes, we recommend reviewing the Minimum Requirements Decision Guide prepared by the National Park Service in their evaluation of proposed GPS stations within designated Wilderness in the Lake Clark and Katmai national park and preserve units.

Thank you for the opportunity to comment. Please contact me at 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Magee', written in a cursive style.

Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator