

STATE OF ALASKA

SEAN PARNELL, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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November 20, 2009

William Freeland, Environmental Protection Specialist
U.S. Coast Rescue 21
Project Resident Office Alaska
100 Savikko Road
Douglas, AK 99824

Dear Mr. Freeland:

The State of Alaska reviewed the scoping notice regarding the proposal to permit, construct, operate and maintain search and rescue communication facilities in the Middle Cape area of the Kodiak National Wildlife Refuge. The following consolidated state agency comments were compiled by the State's Alaska National Interest Lands Conservation Act (ANILCA) Implementation Program and cover issues relative to ANILCA and other state interests, including preliminary comments relative to the Alaska Coastal Management Program (ACMP). The Alaska Department of Natural Resources, Division of Coastal and Ocean Management (DCOM) is responsible for implementing the ACMP. Any future correspondence or project submission relative to the ACMP must be directed to DCOM.

The State is supportive of the Coast Guard's intent to modernize and replace its maritime search and rescue communications systems, which will increase security and public safety in Alaska. When preparing the draft environmental assessment, it would be helpful to clarify that the proposed facilities, which enhance maritime safety, are considered under ANILCA Section 1310(b) as navigation aids.

We recommend the following actions to help reduce negative bear/human encounters and impacts to wildlife.

- Require construction crews to use bear safety protocols while in the field.
- To protect both bears and facilities, secure sites with adequate fencing to prevent bears from entering. Fences should be gated and locked to keep hunters from using the fenced areas to hang meat or camp (a problem we have seen elsewhere under similar circumstances).
- Adopt appropriate mitigation measures to help prevent bird strikes with the tower and any associated guy wires.
- Hazardous materials necessary for the construction or operation of the facility must be appropriately contained and securely stored for removal in accordance with applicable state and federal laws.

The Alaska Department of Fish and Game, Division of Habitat has permitting authority for projects occurring below the ordinary high water mark of fish bearing water bodies. During the initial site selection process, we recommend the Coast Guard avoid areas identified under the Alaska Coastal Management Program *Habitats Standard* (11 AAC 112.300). If construction activities are proposed within any of the identified areas, the project must be designed to avoid, minimize, or mitigate significant adverse impacts to resources.

We appreciate this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions or need assistance determining appropriate state contacts.

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
Gary Wheeler, Refuge Manager, Kodiak National Wildlife Refuge