

STATE OF ALASKA

SEAN PARNELL, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

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April 5, 2010

William Freeland, Environmental Protection Specialist
U.S. Coast Guard Rescue 21 PRO Alaska
100 Savikko Road
Douglas, AK 99824

Dear Mr. Freeland:

The State of Alaska reviewed the Environmental Assessment (EA) for the proposed 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. Any correspondence or response pursuant to the Coastal Zone Management Act and the Alaska Coastal Management Program will be provided separately by the Division of Coastal and Ocean Management.

The State is supportive of the Coast Guard's intent to improve maritime distress and response communications coverage for the Shelikof Strait area, which will increase security and public safety in Alaska.

The EA indicates that "*Materials would be transported by landing craft from Kodiak to Halibut Bay and unloaded using a beach-tired forklift to just above high water line.*" (Section 2.2.2) The demarcation line for tidally influenced areas is *mean high-tide*, whereas "*high water line*" relates to non-tidally influenced waterbodies. Should unloading activities occur below *mean high-tide*, authorization from the Alaska Department of Natural Resources (DNR), Division of Mining, Land and Water would be required. In addition, if offloading is conducted in a similar manner for the Twin Peaks repeater site at the Alitak production facility, authorization may also be required. For additional information or assistance determining whether an authorization would be required, please contact the DNR South Central Region.

In Section 3.12.1, the EA states "*Fish are likely to be present in the summer when construction activities would take place, although no inwater work is proposed.*" In addition, as previously noted, Section 2.2.2 indicates a mobilization site for the Middle Cape facility will be located at Halibut Bay. Two unnamed specified waterbodies are located adjacent to this mobilization site (Waterbody Nos. 256-30-10020 and 256-30-10010-2001). To protect fish habitat and resources, we request that within 50 linear feet

of the unnamed waterbodies, no fuel be stored, no vehicles be fueled or serviced, and no vehicles leaking fuel, hydraulic fluids, or other pollutants be operated. If construction activities include motorized crossings of anadromous or resident fish streams, in accordance with AS 16.05.87, a Fish Habitat Permit from the Alaska Department of Fish and Game would be required.

A public health and safety concern not discussed in the EA is the possibility of wind turbine icing during winter. Wind turbines that are not outfitted for cold climate installation and operation can be susceptible to malfunction or icing -- a situation where ice forms on the wind turbine blades and is thrown about by the blade movement. Due to the small size of the wind turbine and remoteness of the site, safety issues emanating from icing would likely be limited; however, we recommend selecting a wind turbine that has been vetted in arctic or cold climate conditions.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions or need assistance contacting a state agency representative.

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, Kodiak Refuge Manager
Helen Clough, Chief, Conservation Planning and Policy