STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF PROJECT MANAGEMENT AND PERMITTING

SEAN PARNELL, GOVERNOR

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August 8, 2011

Rick Parkin
Environmental Protection Agency
222 W. 7th Avenue
Anchorage, Alaska 99513

VIA EMAIL

Re: Bristol Bay Watershed Intergovernmental Technical Team Meeting, August 9-10, 2011

Dear Mr. ~~Parkin~~: Rick

On behalf of the State of Alaska, thank you for the recent invitation to participate in the Intergovernmental Technical Team (ITT) formed by the Environmental Protection Agency (EPA) in relation to EPA's proposed "Bristol Bay Watershed Assessment." The State appreciates being included and we are interested in providing relevant technical information and scientifically reliable data. A list of state employees attending the upcoming August 9-10, 2011 is enclosed. . Sharmon Stambaugh is coordinating the State's participation in the assessment effort and can be reached at (907) 269-0880, or sharmon.stambaugh@alaska.gov.

While the State appreciates the opportunity to observe and participate in the ITT, this participation should not be viewed as an endorsement of either the group's activities, or EPA's overall proposal or process, announced this past February, to conduct a watershed assessment. Nor should the State's participation in the group or the assessment be construed as an endorsement of third party information gathered by EPA in this process or EPA's eventual analyses/conclusions/outcome of the assessment.

This assessment and the evolving process that EPA proposes is, frankly, unprecedented and not prescribed in statute or regulation. Indeed, the State believes that if EPA deems a review under Section 404(c) of the Clean Water Act is needed, that review should be conducted in conjunction with a pending permit application where actual activities and potential disposal sites are clearly specified, not in the abstract as it will be in this assessment process. Thus, we reserve the right to raise objections concerning the assessment and process that we may determine is necessary to ensure compliance with applicable law and to preserve the rights of the State in administering its regulatory authorities.

I'm sorry that I'll be unable to attend the meetings due to a prior commitment. Sharmon, however, has assembled a team of experienced representatives who are looking forward to meeting with you and your staff.

Sincerely,

Tom Crafford, Director

Cc:
Ed Fogels, DNR, Dept. Commissioner
List, below

List of State Alaska Employees Participating in the ITT:

Sharmon Stambaugh (DNR, Office of Project Management and Permitting)
Gary Prokosch (DNR, Div. of Mining, Land & Water, Water Section)
Dr. Paul Anderson (DHSS, Division of Public Health, HIA Program)
Mike Daigneault (ADF&G, Division of Habitat)
Kate Malloy (ADF&G, Division of Habitat)
Lynn Kent, (DEC, Division of Water)
Allan Nakanishi (DEC, Division of Water)
William Ashton (DEC, Division of Water)