



ANCHORAGE WATERWAYS COUNCIL

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<http://www.anchoragecreeks.org>

March 16, 2011

Darla Acker
Alaska Department of Environmental Conservation
1700 E. Bogard Rd, #B103
Wasilla, AK 99654

Re: Permit Requested by ARRC to apply herbicides within the Alaska Railroad Anchorage Yard

Dear Ms. Acker:

This letter is in response to the pesticide permit requested by the Alaska Railroad Corporation (ARRC) for its Anchorage yard. The Anchorage Waterways Council (AWC) is greatly disturbed by the potential for issuance just as we were about the previous permit which allowed herbicide spraying along tracks adjacent to the Seward Highway. Our mission is to “protect, restore, and enhance the waterways, wetlands, and associated uplands of Anchorage”. After reviewing the permit application and some of the application materials, AWC does not feel that DEC has adequate information to make an informed decision.

My major concerns follow. First, I find it very unusual for the ARRC to supply a project location map on a USGS topographic map that is not the most recent. The so-called “Vicinity Map” is the 1:63,360 USGS top map from 1952 with minor revisions in 1963. Surely someone on the ARRC staff realizes that the map was updated and re-printed in 1994—and it shows how much more of Anchorage is settled than this old map depicts. That is a minor complaint, but still it tends to show a lack of regard for accuracy in my opinion.

The primary concern I have has to do with the “missing information” that I feel should have accompanied the map titled “Anchorage Yard Storm Drain Manholes”. In reading the permit, it states that there will be a 25’ buffer around these manholes. Whether these are true “manholes” or storm drains, their goal in a stormwater system, such as the Municipality of Anchorage (MOA) has, is to convey runoff into the nearest creek or waterbody. By looking at the attached maps from the MOA Street Maintenance Division (2008) that I have attached, anyone can track the direction stormwater flows from the manholes—and that is to Ship Creek in at least 4 outfalls. The Street Maintenance map shows that the storm pipe system is both Private and Municipal before entering Ship Creek.

Storm drains collect excess water and direct it off property into our creeks—untreated! Even if the ARRC stays 25’ away from one of these manholes/storm drains with its herbicide, what protection is there that rain, water from washing an area down, or some other source won’t direct herbicide-laden water into the storm drain system and directly UNTREATED into Ship Creek? Is someone going to test the outfalls for herbicides? Ship Creek is a major sport fishery in Anchorage. It is a huge part of the tourist industry. There is a hatchery up stream that young smolt will swim down into Cook Inlet right through this potentially herbicide-laden water. Spawning Kings will swim back up through this water while unknowing anglers are yanking them from the water. I do not see that having a 25’ buffer around the entrance to the stormwater system is going to protect Ship Creek regardless of how far the spraying is from the creek. I believe that better safeguards as well as herbicide monitoring from the stormwater outfalls need to be written into the permit at the very least.

Please feel free to contact me if you would like to discuss this further.

Respectfully submitted,

Cherie Northon, Ph.D., Executive Director

Xc: Karin Hendrickson, ADEC
Nancy Sonafrank, ADEC
Sharon Morgan, ADEC
Pam Miller, ACAT
Austin Williams, Trustees for Alaska
AWC E-Board of Directors

Attachments: MOA Street Maintenance Map SW1131, SW1130, SW1231 & SW1230, ARRC Anchorage Yard Storm Drain Manholes