

COALBED METHANE DRILLING APPROVED NEAR HEALY CREEK

Hannah Ragland

In late July 2014 the Alaska Division of Oil and Gas provided public notice for the first coalbed methane well to be drilled within the Healy Basin Gas Exploration License, dubbed the "Healy Creek Exploration Project." The state's notice provided an opportunity for public comment on the Plan of Operations for one well, to be drilled near the confluence of Healy and Cripple Creeks. DCC's comments on this Plan of Operations requested clarification on numerous inconsistencies in the Plan, and asked that the state uphold the standards outlined in the Healy Basin Final Best Interest Finding (BIF). While DCC's focus is on residential lands and sensitive lands west of the Nenana River, we asked that operations move forward only with utmost care and scrutiny.



Locked gate near Suntrana Creek limits motorized access on the road to state and Mental Health Trust Property used for coal mining, and now coalbed methane exploration. Used with permission.

Revised Plan of Operations approved, portions appealed by DCC

A large portion of DCC's comments on the Plan of Operations requested clarifications and correction of inconsistencies throughout the document. For example, numerous areas of the Plan clearly stated that there would be no surface disposal of produced water. However, one section of the Plan suggested that produced water would be used for dust control on gravel roads in the area. Other inconsistencies included scheduling and the number of wells and drilling sites would be formally approved by the Plan. The Division of Oil and Gas (DOG) gave the applicant, Usibelli Coal Mine, a chance to revise the Plan to address inconsistencies and typographical errors. A revised Plan was not released for public review prior to the public comment deadline, but was provided after the approval of the revised Plan was announced. The DOG suggested that changes made were not substantive enough to require additional public notice.

Although DCC appreciated the corrections made to the Plan in order to ensure accuracy and clarity, we did not feel that several of the concerns raised were adequately addressed. For this reason, DCC chose to appeal portions of the decision to approve the Plan by the DOG. Our administrative appeal points out that measures included in the Healy Basin Best Interest Finding were not upheld, and identifies several other portions of the Plan that remain unclear.

State decision conflicts with assurances of high standards

Gas exploration in the Healy Basin has been a priority issue for the DCC Board and members. Supported by numerous donations from members, DCC ultimately brought local concerns to the Alaska Supreme Court in 2013. The judicial appeal challenged the legitimacy of the state's decision in refusing to consider the removal of specific sensitive areas, and weakening several mitigation measure requirements between the Preliminary BIF, issued in 2005, and the Final BIF, released in 2010. One such change involved the conditions in which an exception is granted to the applicant for mitigation measures (such as monitoring and setbacks) that would otherwise be required by the Final BIF.

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FROM THE BOARD

Michael Raffaeli

In one of my recent summer weekends I accompanied Monica Morin, a backcountry ranger in Denali, as a volunteer on one of her park patrols. Along with two other volunteers, we headed out to the glacier that comes down from Mt.



Glacial clean-up crew
Michael Raffaeli

Pendelton and is the headwaters of the East Branch of the East Fork of the Toklat. This is the same river that passes by the wolf den Adolph Murie spent so much time watching, and a den that was once again used by wolves this year. We ended up finding a roundabout way to the glacier because a wildlife closure was in effect around the den.

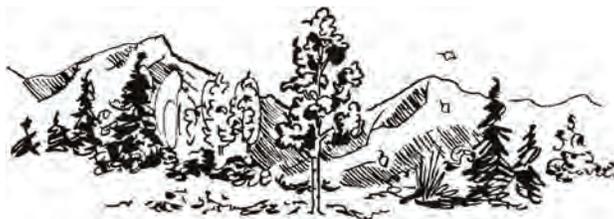
Our patrol had a purpose. Glacier monitoring that had occurred in the 90's left quite a few metal poles that were once inserted into the glacier to gauge its movement laying strewn on the glacier. I had actually seen some of these on my first backcountry trip into the park in 2006. This year, a Geo-Corps intern for the park, Sasha Leidman, had collected as many as he could find. We were the final crew to gather these poles up, saw them in half, and put them in a pile so the park's dog teams could fetch them in the wintertime. It will end up being a fully non-motorized effort to clean up the wilderness in Denali, removing the 31 poles that could be found.

It was one way to honor the 50th anniversary of the Wilderness Act. It was also a chance to do my part, however small, to make a difference. And of course, it was an opportunity to be deep in the park where I find peace.

My recent trip encapsulates what this issue of the DCC newsletter is about. Wildlife and the wolves of Denali were on my mind while I was out in the park. Likewise, wildlife has been on DCC's mind and in this issue, you'll find out more about the Wildlife Forum that was held at the Murie Science and Learning Center as well as the new proposed wildlife regulations for Alaska's Preserve lands. As you'll also see, I wasn't the only one

celebrating the Wilderness Act. The park and surrounding areas were busy with talks, presentations and activities, and they culminated in an essay contest. It is rare that we have the opportunity to do small, tangible and physical projects where the results of making a difference are immediate. While sawing through one of the glacier poles, I thought of the bigger picture, and what it must have taken to create the Wilderness Act. It is hard to contemplate how to make a big difference, but at DCC we are trying when it comes to park planning, wildlife regulations, and gas development. This summer we had an intern, Ian Will, who worked hard to help us get a better grasp of the situation at hand with the latter. Read on to learn what we have discovered about the processes that are in place, and what DCC plans to do about it. Part of our role is to engage you, our members, and the future generations. The park has been doing this too with the upcoming generation. We want to highlight how they have been busy encouraging the stewards of the future, starting in the local communities around Denali.

May your explorations continue to inspire you to make a difference for Denali. ☞



Alaska Native Knowledge Network

THANK YOU, MEMBERS & DONORS

Nancy Bale

As we pass from a busy summer into the fall season, many of our Denali-area members are breathing a sigh of relief. The hoards have departed, snow has blanketed the landscape and settling in next to the stove with a hot beverage feels delightful. Of course, for some of us at DCC the beat has quickened, with winter jobs seizing our time and demanding our energies during most of the diminishing daylight hours.

In addition, the many issues that require our attention and energy have not faded away with the summer tourists. In these pages, you'll read of the important movements afoot both on state and municipal lands next to the national park, and within the park itself. The beating drum of resource development is loud and clear, and DCC must address how to make such development conform to our vision for this area. The challenge of state vs. federal wildlife policy is loud and clear this fall, with the National Park Service facing up to powerful forces in the state of Alaska who would employ inappropriate predator hunting practices on Alaska's 20 million acres of national Preserves.

Not only these issues, but several others occupy the top echelon of DCC concerns. In early November, we're going to hold our annual retreat, where we'll again prioritize our issues, develop a budget for 2015, and have the opportunity for a face-to-face meeting. These retreats are always intense, but fun, too. We'll let you know more about the retreat through member alerts. We'd like all of you to have the opportunity to share your vision with us at this important meeting. We appreciate your participation in our recent membership survey and will take your comments to heart.

Your fall membership renewal letter is on its way to you. If you do not receive it within the week and think you need to rejoin, please email me at nancy@denalicitizens.org. I'll check the member database and let you know. Also, we welcome end-of-year donations from our members. Contributing online is easy. Go to <http://www.denalicitizens.org> and press the Donate button.

I am proud of each and every board member for their contributions in the name of this organization. Hannah is rocking the comments, keeping agencies and developers on task and aware of our presence. Erica is editing the newsletter now, with layout assistance from our wonderful volunteer, Teresa Floberg. Nan still serves on the Middle Nenana Fish and Game Advisory Committee and provides a strong voice for conservation. Michael is competently running the DCC Treasurer's position, Sarah is organizing our meetings and our retreat, David is looking at funding sources and Brian is developing his role as Membership chair, along with running meetings when Sarah is absent. We are all still volunteers and your generosity in supporting our activities is heartwarming. ☺

DONATIONS SINCE OUR LAST NEWSLETTER

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COALBED METHANE DRILLING APPROVED NEAR HEALY CREEK

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According to the Final BIF:

“Exceptions will only be granted upon a showing by the licensee that compliance with the mitigation measure is not practicable or that the licensee will undertake an equal or better alternative to satisfy the intent of the mitigation measure. Requests and justifications for exceptions must be included in the plan of operations.”

The term “practicable” replaced the term “feasible and prudent” that was used in the Preliminary BIF, and appeared to weaken the standard for the consideration of exceptions. The new language eliminated the consideration of environmental or social costs, and instead focused on the economic feasibility of the mitigation measure to the licensee.

Preliminary BIF, 2005	Final BIF, 2010
<p>“Feasible and prudent means consistent with sound engineering practices and not causing environmental, social, or economic costs that outweigh the public benefit to be derived from compliance with the standard.”</p>	<p>“Practicable means feasible in light of overall project purposes after considering cost, existing technology, and logistics of compliance with the mitigation measures.”</p>

DCC requested that the state reconsider this weakened language, and followed through with our concerns to the Alaska Supreme Court. Ultimately, the court decision determined that “as long as the “not practicable” standard is applied so as to be no more permissive than the “not feasible or prudent” standard, there will have been no substantive change to the blanket exception.” This requires a high standard for any exception to mitigation measures that could be considered when exploration operations commence. Yet the Healy Creek Project’s Plan of Operations granted an exception to requirements for monitoring of resource impacts, including water quality and quantity, with no description of why such an exception would be “practicable” or “feasible and prudent.” This exception for monitoring requirements is the first test of the Final BIF’s exception policy, and is not to be taken lightly.

Next steps for coalbed methane exploration in the Healy area

A decision by the Department of Natural Resources (overseeing the DOG) is expected in the near future. Operations have commenced at the Healy Creek well site this fall, located above the confluence of Healy and Cripple Creeks. Although the Plan gives specific information for only one site to be drilled this year, an additional one to three wells could be drilled as early as next year, depending on the first exploration well. It is still unclear whether additional opportunities for public input would be provided for any future exploration wells. DCC asked for clarification in our initial comments, and the DOG responded, “Additional information outlining the proposed operations for 2015 wells will need to be submitted to the Division for review and approval prior to commencing operations.” A request for public notice of future exploration activities was included in DCC’s Administrative Appeal.

As we have maintained for a number of years, any gas exploration or development within the Healy Basin must avoid sensitive areas and adhere to transparent and stringent standards in order to minimize impacts to local residents and sensitive areas. DCC remains committed to holding the state to this high standard. For additional information visit <http://www.denalicitizens.org/healy-basin-gas-exploration-license-2/> or contact hannah@denalicitizens.org. 



According to the Plan of Operations, "Access across Healy Creek is made possible by a twin-span bridge recently installed by the ADNLR Abandoned Mine Lands Program that will be removed after reclamation work on the south side of Healy Creek is complete (no later than 2023)."

Used with permission.

FEDERAL AND STATE WILDLIFE MANAGEMENT: 'RAYS OF HOPE' FOR 'AMERICA'S LAST GREAT INTACT ECOSYSTEM'?

Cass Ray

No one expected new decisions to be announced, and little new information was imparted, but at least one of the three panelists at DCC's August 5 forum on wildlife management at Denali's boundaries said he saw reason for hope and maybe even progress. Near the end of the two-hour forum, John Toppenberg, director of the Alaska Wildlife Alliance (AWA), opined that there were areas in which he and Nate Turner, vice chairman of the state Board of Game (BOG), could agree and cited "rays of hope."



The MSLC classroom filled to capacity for the forum.

Erica Watson

Recognition of those "rays of hope" came two hours after Toppenberg, in his opening remarks, noted that too often the state's response to myriad wildlife management issues is, "No problem. Kill more wolves." The state's Intensive Management predator control program, by which wolves and bears are shot from the air, along with allowing the killing of bear cubs in dens, allowing the killing of sows with cubs, and allowing the use of lights while hunting, amounts to an "extreme approach to wildlife management" that is threatening "America's last great intact ecosystem," said Toppenberg. For his part, Turner, a hunting guide and one of seven members of the BOG, lamented both the "them vs. us" polarization in so many areas of American life today and the dying off of the subsistence lifestyle.

'Backed by credible science'

At the forum in the combined classrooms of the park's Murie Science and Learning Center, moderated by Hannah Ragland, DCC issues president, and attended by a standing room only audience of well more than 100, Toppenberg and Turner were joined on the panel by Don Striker, superintendent of Denali National Park and Preserve. Striker's own closing words included the reminder that wildlife management decisions must be "backed by credible science."

The first of the half dozen members of the audience who asked questions, Bud Rice, environmental protection specialist with the regional office of the National Park Service (NPS) in Anchorage, reminded everyone that a group of concerned citizens has proposed that the federal and state governments exchange land to produce a sort of conservation easement that would replace the closure areas just outside the park that for ten years protected park wolves from hunting and trapping, but which were eliminated by the BOG four years ago. Commenting that the proposal has "a lot of merit," the BOG's Turner stressed that it has "the most merit in my mind." The AWA is "very supportive of the concept," offered Toppenberg.

'When is enough enough?'

Deploring being "the Debbie Downer" of the group, Striker cited the reality of the politics of alleged "federal overreach" and pronounced the proposal "dead on arrival." Many Alaskans' complaints about perceived "federal overreach" and their displeasure with "feds" in general had been cited by Striker and Toppenberg in their opening remarks.

Later noting Denali's growth from 2 million to more than 6 million acres, Striker guessed that many Alaskans' response to a proposal for additional park expansion might be along the lines of, "Holy cow, Denali, when is enough enough?" The park's "relevancy," in the form of its relationship with its neighbors, and in the wake of 1980's Alaska National Interest Lands Conservation Act (ANILCA), which expanded the park and preserve to those more than 6 million acres, remains only "in the experimentation stage," noted Striker.

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FEDERAL AND STATE WILDLIFE MANAGEMENT

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Definition of ‘park wolf’?

The gridlock presently suffered by Congress also was cited as an impediment to any such potential action. Rice noted the Department of Interior, NPS’s parent, also includes the Bureau of Land Management (BLM) and suggested some BLM lands could prove desirable for the state. Barbara Brease, longtime local resident and former member of the DCC board, said the proposed exchange does not have to include only land; there are, she noted, “lots of possibilities.”

When Tom Walker, author and another longtime local resident, asked if the specific number of park wolves killed outside the park was known, Steve Arthur, one of the park’s wildlife biologists, responded that it is “a pretty small amount of harvest...not a large number,” and Don Young, wildlife biologist for the Alaska Department of Fish and Game (ADF&G), agreed the number is “relatively low.” Striker and Arthur noted the question is made more complex by the need for a definition of “park wolf.”

‘Is any level of harvest acceptable?’

Arthur reported that each year two or three wolves that are at least partly resident in the park are killed by hunters or trappers outside the park’s boundaries. Given that the wolf population is a “naturally regulated population,” Arthur posed the question: when the park’s wolf population is declining, as it is now, “is any level of harvest acceptable?”

Bill Watkins, veteran Joint Venture tour bus driver, noted the concern is “not just about wolf numbers” but “also about which wolves,” citing threats to alpha males and females. Why, Watkins asked, are a handful of trappers given more consideration than the hundreds of thousands of park visitors who come to observe the park’s wildlife?

Trappers or park visitors?

Turner responded that the answer was not as simple “as portrayed in the question.” One of the BOG’s mandates is to “promote the history of hunting and trapping”—but, Turner noted, it is not an “exclusive” mandate. Asked why, after eliminating the closure areas, popularly known as “buffer zones,” the BOG prohibited for six years discussion of reinstating them, Turner noted the BOG is “overloaded with our workload,” and the moratorium was implemented “so that we can get the rest of our work done.”

However, Turner added, “things are being monitored. It’s not like the Board just looks away for six years.” Concluding that discussion, Toppenberg disagreed with Turner but agreed with Watkins that three trappers are being favored over hundreds of thousands of park visitors. Only 14 percent of Alaskans have active hunting or trapping licenses, Toppenberg had noted in his opening remarks.

‘Loss of ancient knowledge’

When Brease noted that each wolf death has an impact on the “social dynamics” of the pack, Arthur responded that the park recognizes the “importance of individuals” and that evidence of the park’s concern for its wolves is its sponsorship of the doctoral studies of Bridget Borg. After Arthur noted that “wolves are pretty flexible,” Toppenberg recalled that Gordon Haber, the late wildlife biologist who studied the park’s wolves for decades, was “adamant” about “the importance of ancient knowledge, the loss of ancient knowledge.” Another question posed by Brease was how the park would know that its wolves were suffering a “biological emergency,” given that on the park’s south side, wolves are neither collared nor tagged.

The last issue addressed by the forum’s audience came from an Alaska Geographic employee who noted that the thirty or so domesticated canines in the park’s kennels soon might outnumber the wild canines roaming the park’s more than 6 million acres. Turner responded that it was a “cute analogy, but you can’t compare the two;” that analogy would mean science would “go out the window.” Striker commented that everyone is concerned about the number of wolves in the park, and Toppenberg stressed the value of a healthy wolf population to the health of Denali’s entire ecosystem.

‘Everybody buckle your seatbelts’

DCC members and others attending the August 5 forum may have noted a difference in tone between that forum and its predecessor, in June 2010, less than four months after the BOG eliminated the buffer zones and barely a month after the shooting to death of a grizzly by a park visitor at Tattler Creek (believed to be the first time a park visitor had shot and killed a bear in the “old park” portion of Denali). At that first forum, a regional supervisor for ADF&G cited a “high degree of animosity” between the federal and state governments, as well as plenty of “federal-state head-knocking.” “The politics are

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extreme right now,” agreed another member of the panel, a conservationist who was director of the Science Now Project. Simply put, noted the ADF&G representative, the federal and state governments have “two very different mandates.” “Strong politics” and “grumbling” about the federal government allegedly “moving in on state rights” were predicted by the conservationist. “Everybody buckle your seatbelts,” advised the ADF&G representative.

At the August 5 forum, between the introductions of the three panelists and the audience’s questions, Nancy Bale, DCC board secretary, reviewed the history of wildlife management in the Denali area, noting the park’s current “actionable low density of wolves.” In thirteen years the chances of seeing a wolf in the park fell forty percent, to only four percent in 2013. Bale noted that no areas northeast of the park, where wolves often follow migrating caribou out of the park, are designated for the state’s Intensive Management predator control. The BOG’s 2010 vote eliminating the buffer zones was 4 - 3. The vote remains controversial; within weeks, one of the four members casting those deciding votes was removed from the BOG, when the state legislature overruled his appointment to the board by the governor.

Following the forum, members of the audience were invited to continue the discussion by contributing their thoughts and additional questions to easel pads, and postcards were available to mail to Sean Parnell, the governor, and Sally Jewell, secretary of the interior. ☞

TWO GAS PIPELINE PROJECTS CONTINUE THEIR FOCUS ON DENALI AREA

LOCALS FACE BOTH ASAP AND LNG PROJECT ACTIVITIES TARGETING A PARKS HIGHWAY ROUTE

Nancy Bale and Ian Will

For many years now, Alaska has sought a way to deliver North Slope gas to national and international markets. Alaskans once thought there would be a line from the North Slope, through Canada, to the American Midwest. A host of other options were considered, too, among them a gas pipeline down the Trans-Alaska Pipeline System (TAPS) corridor to Valdez, an LNG plant there, and shipment to Asia. There was a proposal for an LNG line designed to send liquefied natural gas from Cook Inlet via Nikiski to Asia. There were advocates for a completely in-state gas pipeline, which was touted as a way to solve Alaska’s energy needs for decades. Now, Denali locals are faced with two new gas pipeline projects, each of which would put a gas pipeline down the Parks Highway and through their towns, subdivisions and recreation lands.

Line 1: The ASAP line

We at DCC have followed this in-state gas pipeline project since it was envisioned by Enstar Natural Gas Company. Enstar proposed a relatively small line to bring gas from the north slope Gubik field down the TAPS corridor, with a spur to Fairbanks, then down the Parks Highway to Anchorage. The Enstar project gradually morphed into the Alaska Stand Alone Pipeline (ASAP) project, which would bring gas from Prudhoe Bay to Southcentral Alaska. The Alaska Gasline Development Corporation (AGDC), created and funded by the Alaska Legislature, is responsible for developing, funding and building the line. The ASAP line has been proposed as the fastest way to get gas to the Anchorage area, where projected fuel shortages were considered serious a couple of years ago. AGDC has brought the ASAP project to the Denali community during a series of meetings, presentations and permit requests before local government. It was AGDC that requested permits for shovel work along the proposed route, including borehole drilling east of Denali National Park in the Montana Creek and Yanert Valley areas.

An Environmental Impact Statement, conducted by the Army Corps of Engineers, is under way for this project. DCC made comments on the ASAP EIS two years ago, and just recently commented on the Supplemental EIS. If this 36 inch diameter, in-state line were ever to be constructed (with a completion date projected to be in the early 2020s), it would bring “burner tip ready” gas from Prudhoe Bay, down the TAPS corridor to Livengood, then veer from TAPS west of Fairbanks (with a spur to deliver gas to Fairbanks) and join the Parks Highway north of Nenana, traveling near the Parks all the way south to Anchorage. Legislation that could route the line along the Parks Highway through Denali National Park was passed by the United States Congress in September 2013. However, the preferred route still bypasses the National Park and moves through undeveloped lands east of the park in the Montana Creek and Yanert Valleys.

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A COLLECTIVE MEMORY

Erica Watson

This summer, Denali National Park held a wilderness writing contest, inviting writers of all ages and experience levels to submit their response to address the question, “If wilderness could speak, what would it say?”

Along with a few other local writers and readers, I was able to read all the submissions as judge, and appreciated the different approaches writers brought to the prompt. We decided on three winning essays, which were published in the Fairbanks Daily News-Miner on September 13, and are still available online at newsminer.com.

The winning essay in the youth category especially caught our attention, with its creative images, like “the cold ground counting on its muddy fingers,” and creative exploration of the contest’s theme. The writer, sixteen-year-old Savannah Seymour, lives on the outskirts of Baltimore, Maryland, and visited Denali multiple times during a summer she spent staying with her sister at Ft. Wainwright. Savannah says she first developed an appreciation for wild places in a rundown park near her house, “with very old trees and an overgrown baseball field.” The park is “one of the few places she doesn’t feel homesick for Alaska,” and going to her park and crinkling the dried leaves in her hands evokes the same feelings of connection she felt at Denali. Savannah’s respect for nature gives equal weight to these small, hidden places as to the recognized and protected places like Denali. “Even if I don’t get to experience a place, someone else will, and that...means it deserves to be respected and protected,” she says. Savannah knows that writing and advocacy will continue to be a part of her life, and I hope to hear more of what she has to say someday.

For now, Savannah agreed to let us reprint her winning essay/poem, “A Collective Memory.”

If the mountains and the sky and the ground could piece together a collective memory,
What would it hold?

To these great watchers and waiters who have done so for hundreds of years,
what would stand out in their minds as relevant?

Would they remember the first feet that stumbled into their magnificent maze,
the first faces that burned beneath their sun,
the first lips that kissed their waters?

Or would these happenings pass as freely and silently through their memories as clouds fat with rain that never settled over their heads?

Could a river recount every clopping hoof and rolling rock that splashed into it,
Every ripple spread by the thirsty noses of great moose and caribou,

Every blade of grass that floated at its edge,
or would it only recall the grander experiences,

such as ribbons of light dancing on the glittering eyes of waiting winter snow,
or the reflection of a mountain on its surface in a brief moment of calm?

If a mountain could remember,
What would he say he had seen?

Would he recount the day a road began weaseling its way into view?

Would he remember the day I climbed him,

Moving slowly up his ancient brown face like a fly perusing the cheek of a sleeping bear?

Could the cold ground count on his muddy fingers all the bodies buried inside him from days long ago,
when the world seemed a much greater thing that begged exploration,

when the sun was a thing to be praised and a mountain a thing admired,

when roads and trails were barely birthed ideas and the only road maps in existence were the constellations that lit/
dark skies?

Would the stone remember the first sparkling flakes of winter a thousand seasons ago,
could it remember where the rivers were born as trickling streams at the start of summer?
But perhaps an even greater question,
Would the earth around this breathtaking living world remember anything that we ourselves cannot?
For does not rain feel the same painted on your skin now as it would a thousand years ago?
Would the rivers rush in a different direction,
Would the sound of water over rocks sound any different than it does now?
could clouds be bigger and whiter,
Would the sun be any less warm and yellow,
Would the mountains be any less brown and green and magnificent?
What makes this beautiful land so beautiful anyway?
If the mountains and the sky and the ground could piece together a collective memory,
Would it be any different than yours, having experienced the same place?
Cities race, money conquers,
people explore, expand, and then die.
Things change.
But untouched nature,
Raw power and grace and wilderness,
when left to their own remarkable devices,
Remain timeless.
So if the mountains and the sky and the ground could piece together a collective memory,
Would they really be remembering anything at all?
Or would they simply be recounting the present,
Where a thousand years pass in a single day of their lives?

-Savannah Seymour



Photo courtesy of Camp Denali

TWO GAS PIPELINE PROJECTS CONTINUE THEIR FOCUS ON DENALI AREA

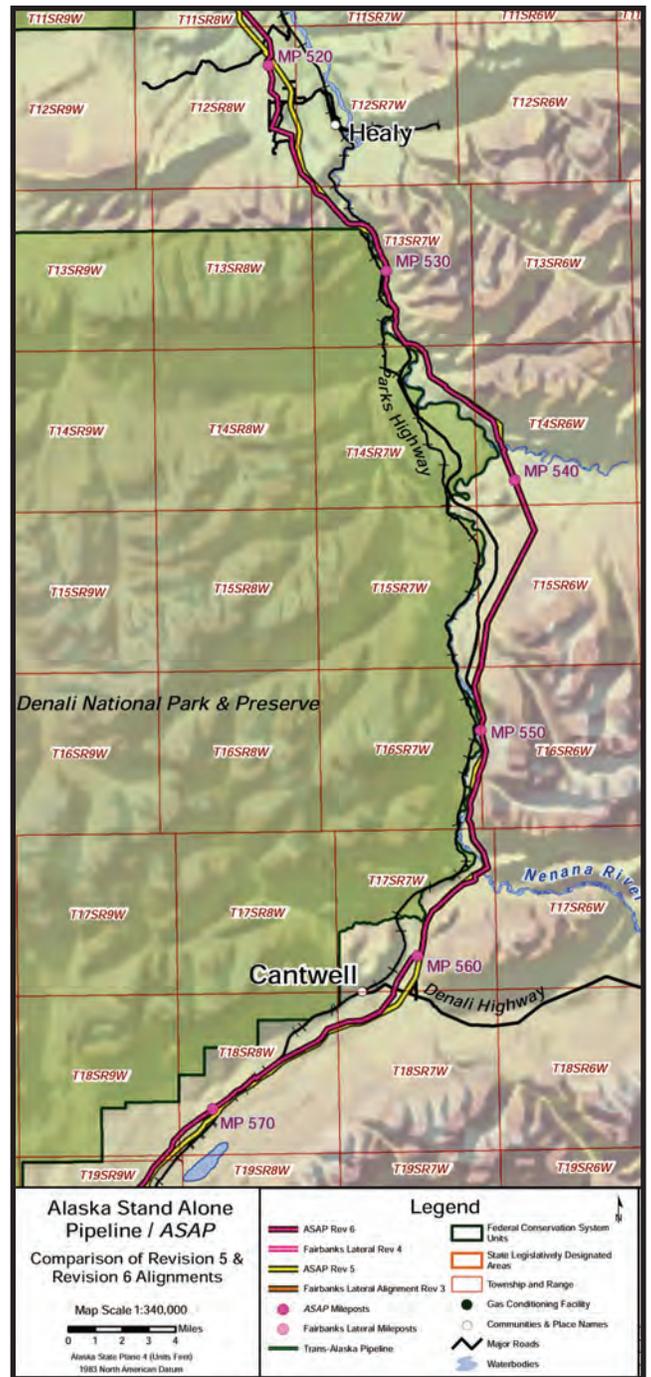
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Would the ASAP line benefit the local community? It is hard to say. Multiple material sites, many “temporary” roads, and a 200 foot construction right of way would forever change those parts of the local community through which this line would travel. Although we are told the gas would be burner tip ready, any take-off or distribution of gas to the local community would have to be paid for by the local community. Roads promised to be temporary would be difficult to rehabilitate. When the ASAP line travels near homes, there would be safety implications. We are told the National Park Service has expressed an interest in taking off some gas, and has even been suggested as a “partner” in this project. Perhaps NPS can afford to build the infrastructure, but the impacts on the already built-out entrance area would be large.

Line 2: The LNG line

More recently, much larger players have entered the local gas pipeline game - a pipeline construction company, TransCanada Alaska Development Inc., three oil companies (the "producers"- Conoco Phillips, BP and ExxonMobil), and the Alaska Gasline Development Corporation (AGDC-the same company running the ASAP project). Their much more ambitious project, the Alaska LNG Project, is designed to be a highway of gas for both Alaskan and international markets. The Alaska LNG Project currently proposes a route “similar to” the ASAP route, but the pipeline would be larger, 42 inches, under higher pressure, have a number of compressor stations along the route and would likely not be available for take-off into small communities, because of the high cost of a take-off plant and associated distribution infrastructure. Gas could be delivered to Fairbanks, Anchorage and the Kenai Peninsula through this line, but much of it (20 million metric tons) would be sent to Asia in specialized tankers, after having been converted to Liquid Natural Gas in Nikiski, Alaska. The decision to make Nikiski the terminus of this line was not made through extensive public involvement, but it met the needs of “the producers” and their LNG partners. Completion date is, again, in the 2020s.

Would the LNG Project benefit locals? It is hard to see a local benefit to this pipeline. What is clear is that there would be great disruption of wild lands, pipeline infrastructure near towns, through the Nenana Canyon hotel area and near residences and subdivisions – all without much chance of obtaining any benefit to individuals or local government. There is a perceived benefit to Alaskans in general, if cheap gas were made available to larger communities and cities, and if state government could benefit from tariffs and taxation. NPS could possibly take off gas, but again with a large infrastructure footprint. Tolerating such local disruption to accept a less specific “general benefit” would be a tough pill to swallow.



Map from ASAP website shows most recent route for the ASAP pipeline in the Denali region. Near Healy the line would cross Hilltop Road in the midst of a residential area. The line would then somehow negotiate the narrow Nenana Canyon and densely populated tourism area. In a move unpopular with locals, it would then veer into prime wildlife habitat and recreation lands, across Montana Creek and the Yanert Valley and then return close to the Highway near Carlo Creek.

Map from asapeis.com

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TWO GAS PIPELINE PROJECTS CONTINUE THEIR FOCUS ON DENALI AREA

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It is fairly likely that the LNG Project will eventually overtake ASAP as the preferred pipeline project, because of the economic benefit of selling some of the gas to Asian markets. However, the choice between these two projects will not be made until early 2016. During the interim, it will be important to attend public meetings and comment on permit requests from both entities. Most recently, the ASAP Supplemental EIS scoping comment deadline sought comments. In mid-October locals were to be interviewed on where, when and how they hunt and harvest resources for a Subsistence Mapping Study, conducted by Stephen R. Braund and Associates. We will keep you informed about opportunities to participate and comment.

Our summer gas resource strategist, Ian Will, looked deeply into both projects. Ian spoke with Department of Natural Resources Commissioner Joe Balash at a public forum on the LNG project in Fairbanks. Mr. Balash informed him that the ASAP pipeline is the backup plan for the LNG line. He referred Ian to the Heads of Agreement document for the LNG project (HOA, signed on January 14, 2014), that states information is being shared between the two projects, although how much information is confidential. Mr. Balash also referred to the ASAP pipeline as the State of Alaska's "ace in the hole," meaning that should the LNG be found uneconomic, then work will resume on the ASAP, a seemingly less controversial and substantially cheaper alternative.

Additional concerns and impacts for locals to consider

Ian gathered a great deal of information on the impacts of gas pipelines, created a database and web content on ASAP and LNG, spoke with a number of locals and attended meetings. More detailed notes and references for the concerns he details below are available by request.

Seismic activity presents numerous problems for either pipeline

The seismicity of the Denali Borough could pose a large risk to the citizens of the Denali Borough. Alaska is the most seismically active state in the union and its tectonic activities are least understood. The Denali Borough is the home to a large number of active fault lines prone to causing earthquakes and other geologic disturbances as well as faults lacking adequate geophysical signatures, making them less predictable. A map of the active fault lines in Alaska and the Denali Borough can be found at <http://maps.dggs.alaska.gov/qff/#-16406115:9298369:7>. In addition, Alaska since the year 1900 has had an earthquake larger than a magnitude of 8 on the Richter scale every thirteen years.

To solve the problem of seismic activity, a pipeline could be located above ground over serious fault lines thus allowing it to move without rupture or breakage. While this has worked in the past on the TAPS pipeline it is not a guarantee of safety in the future. What the concern becomes in this seismically active, tourist-driven borough is that the original promises the project sponsors made that the pipeline would cause limited visual problems are suspect. The pipeline will likely have to remain above ground in many different places, creating viewshed disturbances there.

Line rupture in a high pressure gas pipeline could produce a sentinel event

The LNG pipeline will be kept under pressure by 8 compressor stations along the route of the pipeline. A malfunction in the pipeline would not be the same as it would in an oil pipeline, which would result in a spill. A rupture or leak in a natural gas pipeline would instead create an explosion and probable fire. This kind of accident could destroy valuable wild lands and associated structures and cabins. A study based on a natural gas pipeline with a much lower pressure and smaller diameter than the LNG pipeline found that the adequate safe distance that any structure or humans must be from the pipeline approached 1000 meters. (Sklavounos, Spyros, and Fotis Rigas. "Estimation of safety distances in the vicinity of fuel gas pipelines." *Journal of Loss Prevention in the Process Industries* 19, no. 1 (2006): 24-31).

Much remains to be learned about the two pipeline projects currently being proposed to travel through the Denali region. We urge our members to stay in touch, attend meetings and make contacts. Links to websites are listed below.

ASAP Pipeline: <http://asapgas.agdc.us/>

Alaska LNG Project: <http://www.ak-lng.com/> and <http://www.arcticgas.gov/alaska-lng-project>

As always, we'll send alerts when important comment opportunities occur. 

NPS SEEKS TO BAN UNETHICAL HUNTING PRACTICES IN PRESERVES

PERMANENT REGULATION WOULD BAN BEAR BAITING, FLASHLIGHTING , LATE WOLF SEASONS

Nancy Bale

On September 4th, 2014, the National Park Service (NPS) published a draft Regulation (RIN 1024-AE21) in the Federal Register, and simultaneously published an Environmental Assessment, "Wildlife Harvest on National Park System Preserves in Alaska." Both documents would amend hunting regulations in National Park Preserves to disallow State of Alaska regulations that involve enhanced take of predators. A ninety-day comment period ensued, hearing dates were recently released, and the comment deadline was set as December 3, 2014. We at DCC urge our members to support this Regulation by attending hearings and providing written comments.

NPS - State of Alaska goes too far in authorizing predator hunting

Although the State of Alaska generally sets hunting regulations on Alaska's 19 million acres of National Park Preserves, this draft NPS Regulation would ban certain, recently-adopted predator hunting practices authorized by the Alaska Board of Game (BOG). These practices employ what many consider to be unethical methods – the taking of black and brown bears over bait, the flashlighting of black bear sows and cubs in their dens for hunting purposes, and the extension of the wolf and coyote season into June, during denning time. The draft NPS would ban all these practices, and also the shooting of ungulates while swimming.

How can one reconcile the legal mandates of the State of Alaska and NPS?

The conflict between State of Alaska hunting principles and the policies of the National Park Service has been recognized for years. However, efforts made by National Park Service managers to convince the Alaska Department of Fish and Game to change its policy through state regulations have been unsuccessful. Until now, NPS used the yearly Superintendent's Compendium to ban these practices in the Preserves, but the Compendium process is time-consuming and temporary. With this EA and Regulation, NPS would make the bans **permanent** and establish a process for preventing aggressive predator hunting practices in the future.

The EA and Regulation are available on line at the URLs listed below:

EA - <http://www.parkplanning.nps.gov/projectHome.cfm?parkID=1&projectID=49062>

Regulation - <http://www.regulations.gov/#!documentDetail;D=NPS-2014-0004-0001>

The basic mandate for NPS lands differs substantially in law and history from that of the State of Alaska. NPS lands must be managed for diverse, abundant wildlife populations, even on the Preserves. NPS Management Policies (2006) state, "The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species, nor does the Service permit others to do so on lands managed by the National Park Service" (EA, p. 3).

By contrast, the State of Alaska has interpreted the sustained yield principle (a principle of wildlife management established in the State Constitution) to mean "the achievement and maintenance in perpetuity of the ability to support a high level of human harvest...(AS 16.05.255(k)(5))" (pg. 1, EA). Although many of us feel that recent interpretations of sustained yield go too far by authorizing unethical predator hunting activities, our voices have not yet turned the tide.

State policy, by its nature, supports enhanced predator hunting, for two stated reasons - to promote the survival of prey species (moose and caribou) and to provide additional hunting experiences. Recent assertions by State Division of Wildlife Conservation Director Doug Vincent Lang hint that it may be more important for the agency to support increased hunter opportunity than to consider the ethics of these practices.

Federal Overreach or State Bull-headedness?

The State of Alaska could have cooperated with the National Park Service to resolve the issue of wildlife management in

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NPS SEEKS TO BAN UNETHICAL HUNTING PRACTICES IN PRESERVES

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the Preserves. There is ample precedent for such cooperation. After the Alaska National Interest Lands Conservation Act enlarged the national parks in 1980, then-Commissioner of Fish and Game Ronald Skoog and NPS Regional Director John E. Cook signed a Master Memorandum of Understanding (in October 1982). In the MOU, the two agencies recognized each other's varying priorities and agreed to work together to resolve issues.

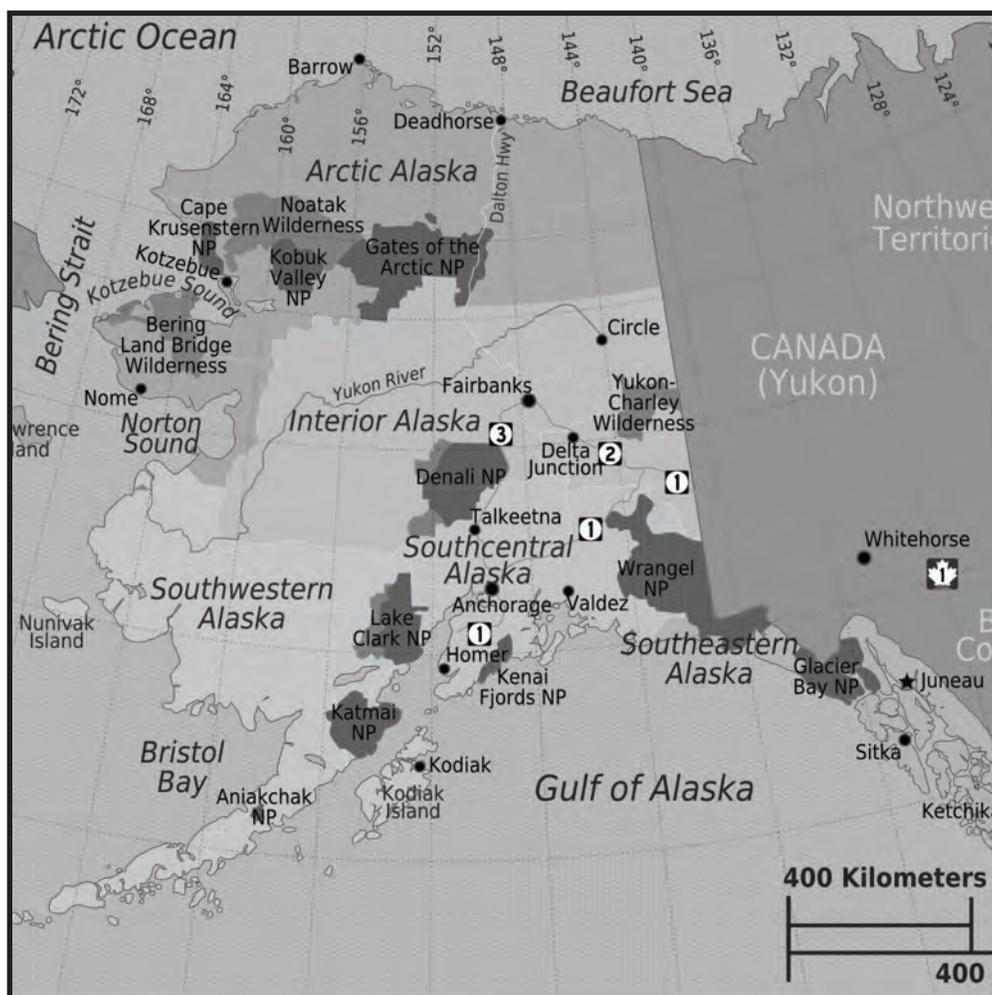
We know that these agencies already work together, at least for purposes of research and science. However, we're concerned by the rhetoric among top officials of ADF&G, including members of the Board of Game and Mr. Vincent Lang himself. The rhetoric oversimplifies this situation as one of "federal overreach" and seeks to demonize NPS, impugn its motives, and ignore the extensive wildlife management research and public education activities performed by national parks. The rhetoric argues that the state's unfair hunting practices are "traditional" and NPS is depriving rural Alaskans from their established hunting practices. However, in the case of Denali, the Denali Subsistence Resource Commission has stated that such methods are not customary and traditional. It is clear – the Alaska Department of Fish and Game hears only those proposals that reflect a highly consumptive attitude toward hunting and hunter opportunity.

Ethical hunting and fair chase vs. hunter opportunity Get out and comment

It is by no means certain that this regulation will have smooth sailing during public hearing and comment, or in the press. We urge our members and interested parties to turn out for hearings and submit written comments by December 3rd supporting this Regulation. With respect to wolf season, we suggest that you argue for an even more shortened wolf hunting season, ending in early March, well before denning time.

There were three opportunities for locals to testify at hearings – at the MSLC on October 22; in Healy on October 23rd; and in Cantwell on October 27th. Anchorage hearings were scheduled for October 28th, Fairbanks on October 30th. For details on opportunities to comment, see the DCC website, <http://www.denalicitizens.org>, or call Brooke Merrell at the NPS Regional Office: 907-644-3397.

To comment in writing, go to the links to the EA and Regulation in this article and submit that way. If you are a member of DCC, you will receive additional email alerts on this issue. Remember the deadline: December 3, 2014. 



Alaska's roughly 20 million acres of National Preserves are usually attached to parks or monuments, however there are three free standing preserves, Bering Land Bridge, Yukon Charley and Noatak. More than 8 million acres of designated Wilderness exist inside these Preserves, and as many more are eligible for Wilderness designation. Denali alone has over a million acres of Preserve lands.

Credit: Map author: Peter Fitzgerald, used with permission

BRIEF NEWS AND VIEWS

DENALI LONG RANGE TRANSPORTATION PLAN TO LOOK AT BIG PICTURE

Details about Denali's upcoming Long Range Transportation Plan (LRTP) were shared at a public meeting on September 24th at the McKinley Village Community Center. A diverse group of agency representatives were available at the meeting, including National Park Service Regional and Denali planners, the Alaska Railroad, and the Alaska Department of Transportation. The plan will not propose specific projects, but instead will look at the larger transportation framework to identify areas of improvement or growth. Specific projects that move forward as a result of the LRTP would be required to go through a public process in the form of an environmental assessment or impact statement. DCC hopes that this plan does not overlap with the tedious Vehicle Management Plan process that has just begun to be implemented. We are hopeful that the LRTP will provide an opportunity to contemplate topics that were not considered in the VMP, such as affordability of the transit system, shoulder season traffic, and winter use of the Park Road. Three specific scoping questions have been presented to guide comments, including:

- Ten years from now, what would you like transportation within the park and its gateway communities to look like?
- What would you like to see the park focus on in a long range transportation plan?
- What about transportation is important to you when entering, using, or leaving the park?

More specific questions under each of these three broad questions are available on DCC's website (search "LRTP").

Commenters are encouraged to discuss topics in terms of what uses or interests they would like to protect (i.e. an affordable transit system or non-motorized winter use). Although there is no formal end to the scoping period, interested individuals are encouraged to submit comments to mary_mckinley@nps.gov as soon as possible, preferably by mid-November. ☞

THE LATEST ON DENALI'S EDUCATION PROGRAMS

DCC understands how important education is to being a well-informed and active citizen. We'd like to highlight the efforts Denali National Park and Preserve is making to educate local students about the park. Sierra McLane, the park's Education Coordinator, strives to help local youth feel like Denali belongs to them. She has worked hard to connect the larger Denali community with the park by engaging its young people.

This summer, McLane decided to use Tri-Valley School's "Intensive" learning format to gear up for the 2016 centennial celebration of the National Park Service. She noted, "Intensives will provide immersive opportunities for our local youth to engage in complex issues and hands-on learning in Denali. The students will explore how and why NPS works to preserve and protect Denali for the enjoyment of this and future generations." The students chose subject areas including physical sciences, biology, building trades, cultural and social sciences, trail crew, multimedia, and resource protection. Including a day of introduction, students spent five days in the park, three focused on learning about the student's program of choice while working with NPS staff, and the final day preparing and giving presentations about their experiences to the greater Denali community.

This fall, McLane also organized a new program, Denali Science School, which brings Alaskan fifth and sixth-grade classes to Denali for overnight field trips. During these three-day programs, students are immersed in Denali's natural wonders through hands-on science activities, hikes, and journeys into the park. One of McLane's goals is that students will "achieve a better understanding of themselves and the ways in which they are personally connected to public lands." We applaud the National Park Service for supporting these programs. ☞

MCKINLEY VILLAGE COMMUNITY GATHERS TO DISCUSS BOREHOLE PERMIT REQUEST

On August 12, about 40 people met in the McKinley Community Center to discuss the permit requested by the Alaska Gas Development Corporation on behalf of the Alaska Stand Alone Pipeline project. AGDC requested permission from the Denali Borough to drill boreholes in the Yanert Valley, with "temporary" access developed off Yanert Road in McKinley Village. The boreholes would test for load bearing and potential for gravel acquisition along the proposed route of the pipeline.

Denali Borough Mayor Clay Walker was in attendance, and helped answer questions about the borough's permitting process, and encouraged people to write comments voicing their opinion about the boreholes. He made it clear that this was a fairly straightforward decision to approve the permit or not, but the Borough needed public input to inform the choice. Main talk-

ing points included the inappropriateness of using the locally maintained residential road for industrial purposes, the vague descriptions of the proposed activities in the permit application, and lack of a plan for rehabilitation. Conversation at the meeting focused mainly on this particular permit, but many questions and concerns related as well to the possibility of ASAP or the concurrently proposed LNG pipeline passing through the borough.

Many long-time McKinley Village residents were at the meeting, and shared their perspectives on strategies that could be used not only to keep this borehole project from happening, but also to stay engaged with the pipeline proposals. Hopefully, we can maintain the energy and momentum of this meeting throughout the permitting processes. 

DCC OFFERS INPUT ON NPS TRAILS POLICIES

In August, the National Park Service requested public input on two trail-related topics in Denali: how to manage the Eielson Area informal trails, and an Environmental Assessment on rerouting and bridge replacement on front country trails.

One of the growing pains associated with increased visitation in Denali is the creation of social trails, especially evident near Eielson. The NPS scoping addressed social trails leading down and away from the visitor center, as well as paths that lead away from the area around Grassy Pass at mile 68.5 on the Park Road. As a result of NPS-sanctioned guided hikes, recommendations in various privately written guides, and information from shuttle bus drivers and park employees, social trails have developed in these areas. Impairment to the resource and the visitor experience has followed.

When ANILCA designated Denali's two million acre core as Wilderness in 1980, NPS committed to maintaining the untrammeled condition of these the lands outside development zones. In the General Management Plan, this commitment was codified as a "no formal trails in wilderness backcountry" policy.

DCC urged NPS to retain this policy, to consider a comprehensive trails plan if this policy is to be changed prior to creating any new trails in a piecemeal fashion, and to consider the long-term costs of trail building and maintenance. We suggested that the NPS intervene to prevent resource damage and that rehabilitation be done on social trails near Eielson Visitor Center.

In the Hotel Creek Bridge EA, the NPS proposed removing two bridges that commonly blocked the flow of aufeis in the spring, to construct a higher single trail bridge and to reroute trail connections in between on the Taiga and Mount Healy Overlook trails. DCC offered our general support of the plan proposed in the EA, as these changes would improve early-season access and minimize the resource damage caused by the ice forced out of its channel by the existing bridge. See more on our website at: <http://www.denalicitizens.org/2014/09/dcc-urges-nps-to-retain-no-formal-trails-in-wilderness-policy-read-more-in-our-comments-on-eielson-area-trails/>. 

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