



Denali Citizens Council
PO Box 78
Denali Park, Alaska 99755

August 14, 2014

Marsha Lambert, Borough Planner
PO Box 480
Healy, Alaska 99743
RE: Permits #MS 3D-H(B), MS 4A-A(A), MS 4A-A(B)

Dear Ms. Lambert and Mayor Walker,

On behalf of the board and more than 300 members of the Denali Citizens Council, thank you for opening the above permits to public comment. We understand that you can decide on them without public comment and we appreciate your sensitivity to public opinion. The Denali Citizens Council (DCC) represents the public interest in state and municipal lands surrounding Denali National Park. We believe in an informed and active public, especially when large projects and important land management decisions are at stake.

The motivation behind this particular permit, the Alaska Standalone Pipeline Project (along with the Liquid Natural Gas Pipeline Project), is still very early in the planning phase, and many of its details and its potential local benefits remain unknown. It is difficult to comment intelligently about these permits without having a sense of the larger implications of a gasline through the Denali Borough, especially when its route takes it past large concentrations of tourist businesses, next to a major national park destination, across deep glacial rivers and through rural areas that are used widely for recreation and appreciated for their rural character. Therefore, although the wider implications of this permit request are not the current issue, our members and local citizens are certainly concerned about them as we comment on the permit.

DCC urges you to deny the two permits in the Yanert Valley, MS 4A-A(A), MS 4A-A(B). The permit stipulations are too general and vague to give the public confidence that activities under these permits will be conducted with sufficient care, adequate mitigation and meaningful rehabilitation. We note the following concerns:

1. Use of Yanert Road for access is inappropriate

- a. This is a small, local road, meant to be used for access to homesites.
- b. The citizens of this subdivision have placed a Sub Area Use Plan in Denali Borough Code. The plan specifically discusses the desired uses of the road and that traffic is to be light.
- c. It is not clear to us that this road could take the weight of the drill rig, as no weight or psi specifications are listed in the permit.
- d. There is no indication that ASAP representatives knew about the Sub Area plan or contacted anyone in the area before determining that the road would be used for access.

- 2. Stipulations for clearing a cross-country access route are vague and inadequate**
 - a. Promises to operate “in a manner” to avoid disturbance of roots and aquatic habitat are insufficient. Specific mitigations should be listed.
 - b. The attempt to avoid establishment of new or inappropriate trails “to the extent practicable” offers little assurance to locals who already may use parts of this area for access to recreation. Have ASAP folks actually sought out locals to learn about existing trails and uses?
 - c. Deviations of up to a half mile to avoid dense vegetation provide little assurance to those who’d prefer a small footprint, if any from this access trail.
- 3. Drilling rig and activities are inadequately described in the permit**
 - a. Weight and psi for the equipment is important but not included in the application.
 - b. Clearing at borehole sites seems excessive – up to 50 foot radius for **32 boreholes (!)** constitutes thousands of square feet of clearing in a relatively small area.
 - c. Use of helicopters is not described. They are only listed. Although we have called and learned that helicopters would be used for staff transportation twice daily for drilling period of about ten days, the permit should have contained this information. No information on whether an area for helicopter landing will be cleared or where the helicopter activity will be staged is included in the permit.
- 4. Noise**
 - a. No information on noise generated by clearing equipment, drilling or helicopter is given.
 - b. Such information is important when activities are being conducted within a mile of several private residences.
- 5. Indemnification is not offered**
 - a. If the borough accepts this permit, it must accept the fact that the Alaska Gasline Development Corporation has no money to pay for any damages caused.
 - b. Thusly the borough or private citizens may be forced to conduct costly litigation in the event of a spill, an accident, or damage.
 - c. The permit should be more forthcoming on whether this project is insured in any way.
- 6. Rehabilitation of the site is not discussed**
 - a. Perhaps the permittee intends to rehabilitate the site in some way, but the permit gives no hint of what will be done.
- 7. The Yanert Valley is valuable to the Denali Borough without industrial development**
 - a. The Denali Borough, beyond the Sub Area Use Plan, has just begun to provide comprehensive planning for this area.
 - b. Local citizens have stated that they would like to keep the Yanert Valley as undisturbed as possible, given its value as scenic landscape, for backcountry recreation and as habitat.
 - c. A pipeline project in this area would introduce much greater impacts than the current intertie corridor, as a pipeline would likely require acres of gravel sites and at least one access road.
 - d. Local citizens are not ready to abandon their vision for a quiet, rural, wilderness Yanert. This vision has value to the economic engine of tourism that currently drives the Denali area, sustainable through generations.

Not only is this permit application vague on important details, the entire ASAP project is currently vague and poorly described to local citizens. Many are unaware of the details for choosing the Yanert route over the Parks Highway route. Representatives of the project have been unable to answer many questions about the design and life cycle of this project, and whether it is likely to benefit locals in any way. Before more such questions are answered, locals do not have much choice but to oppose this permit. We at DCC **urge that you not approve** the two Yanert permits.

As to the Antler Creek permit application, MS 3D-H(B), we cannot provide adequate comment on activities there, as they are not described in the written materials we have, beyond a map that shows the extent of the area to be drilled. It looks, from the map, as if the intent of borehole drilling would be to determine if it is appropriate to significantly enlarge an existing gravel pit. The location and access to the Parks Highway of this gravel pit are in an important scenic area. We ask **that you deny this permit** until the visual and traffic-flow impact of an enlarged gravel pit can be more thoroughly studied.

Again, thank you Ms. Lambert and Mayor Walker, for your interest in our comments.

Sincerely,

/s/ Nancy Bale

Denali Citizens Council Board of Directors

DCC Board

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