



Cascadia Wildlands Project

Alaska Field Office

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State of Alaska, State Pipeline Coordinator's Office
Gas Pipeline Group
411 West 4th Ave. Suite 2C
Anchorage AK 99501

VIA FAX: 907.646.5012

To whom it may concern,

I would like to submit these brief comments on behalf of Cascadia Wildlands Project, and myself as an individual, regarding the Proposed Decision and Action on ADL 229297, issuing a conditional right-of-way lease for a gas spur line from Glennallen to Palmer, Alaska.

Our primary interest here is conservation of wildlands. That means healthy habitat for a diversity of wildlife, clean water, and clean air. It also means abundant subsistence opportunities for residents, and excellent recreation opportunities for everyone. A sustainable human economy is also part of this equation, but we can easily afford to treat this land well.

It makes no sense to approve a spur line for a gas line that doesn't exist. The project is a long-shot at best. The decision encumbers state land and state agency effort (and thereby taxpayer money) for an unlikely use. This spur line has no value to the public unless it is actually built, which it won't be. The state shouldn't just give rights to speculators to raise investment with. Permits should only happen for projects that are realistically proposed to happen, and to entities that actually build things. This proposal fails both those simple tests.

This decision should wait until the real gasline is proposed. This is the only way to really consider cumulative impacts. It is better not to commit ourselves too early. Since the route crosses BLM land and requires federal permits, it appears that an Environmental Impact Statement would be necessary anyway. It might be best for the state to link its right-of-way to the other in the interests of a more comprehensive review.

I'm concerned that building the proposed gasline could cause substantial environmental impacts that are not being adequately represented. Our greatest area of concern is the portion of the route where it veers off the highway around Chickaloon. This area has high habitat and recreation values that we'd like to conserve. A route that followed the highway would be vastly preferable.

In any case new roads and trails should not be allowed. Opening the right-of-way to ATV and recreational vehicle traffic would cause substantial impacts in terms of disturbance, hunting

pressure, pollution and habitat loss. A simple "road closed" sign won't do the trick, either. If the right-of-way is cleared, people are going to use it.

The other big area of concern relates to the cumulative impacts of the whole project. Do we really want Mat-Su sucking on the little bit of gas that is available in the Copper River basin? It would be better to use any gas locally or not at all. This area has fragile wetlands. Widespread drilling caused by outrageous demand from Mat-Su and Anchorage would cause lasting damage in the Copper River watershed. If a gasline from the North Slope were built, then a route down the Parks Highway makes a lot more sense.

Salmon are rightfully given lots of attention in the Draft. From the Copper to the Matanuska and Sustina watersheds, we insist that salmon habitat be completely protected. Water withdrawals, and pollution from spills are two areas of special concern. Just requiring "plans" is not good enough. Neither is just saying that applicable laws will be followed. We can do a lot better than that. Please include a substantive requirement that salmon be given highest priority.

I urge you to not issue the lease or right-of-way. Failing that, please:

- Condition the lease and right-of-way on thorough environmental review. Environmental problems should be dealt with first in order of priority. They should not left to vague "mitigation" down the line.
- Build continuing public, tribal and agency review into the lease by including
 1. ten-year ROW renewal requirement, and
 2. a citizen advisory council, along the lines of RCAC or Cook Inlet Keeper.
 3. ongoing tribal consultation
- Require a thorough applicant-funded, agency-implemented monitoring regime. This should include 1) baseline, 2) performance and 3) effectiveness monitoring.

Thanks for thoughtfully considering these comments.

Sincerely,



Gabriel Scott
Alaska Field Representative
Cascadia Wildlands Project