

VIA EMAIL (sean.parnell@alaska.gov)
& FIRST CLASS U.S. MAIL

November 20, 2012

Governor Sean Parnell
State of Alaska
P.O. Box 110001
Juneau, Alaska 99811

Dear Governor Parnell:

On January 21, 2010, we filed a petition with your administration to declare the salmon-bearing streams within the proposed Chuitna coal project “unsuitable” for large scale coal strip mining. The rationale for our petition remains simple: the technology does not exist to re-build a salmon stream after the type of intensive disruption coal strip mining would produce.¹

It is now 34 months after our original filing, and to date your administration has failed to make a final determination.

We are writing now to urge you to issue a final decision so Alaskans can better understand whether your administration will prevent the Chuitna coal mine from becoming the first project in state history to mine completely through a wild Alaska salmon stream. As you know, the Chuitna watershed supports all five species of wild Pacific salmon. A final decision to protect salmon habitat would, among other things, demonstrate your administration’s commitment to wild Alaska salmon in the face of depressed Chinook runs across the state.

As ADFG and DNR grapple with salmon habitat protection around the Chuitna project, it is important to recognize your administration already understands the devastating implications coal strip mining will have on salmon streams. For example, in the proposed Best Interest Finding (BIF) for the Canyon Creek coal leases near Skwentna, ADFG recommended 100’ setbacks on salmon streams in the area, and the Department of Natural Resources (DNR) accepted those recommendations in the draft BIF.²

¹ See Testimony of Dr. Margaret Palmer before the Alaska Senate Judiciary Committee (Mar. 2, 2012) (“[T]here is extensive scientific documentation of widespread failures of restoration projects in watersheds far less impacted than what is proposed for the Chuitna watershed; thus the likelihood of reclamation success to support salmon populations is at or near zero.” Available at: <http://chuitna.org/expert-tesimony-dr-margaret-palmer>

² In making this reference, however, we are in no way suggesting 100’ buffers are adequate to protect salmon habitat in the face of intensive land uses such as coal strip mining. In fact, additional considerations, including but

Parnell ULP Letter
November 20, 2012
Page 2

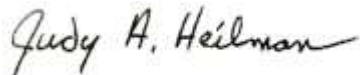
Based on your administration's appreciation of the impacts to salmon streams from coal strip mining, we urge you to create the regulatory certainty industry and the general public demand, and set a positive precedent for salmon management by granting the unsuitable lands petition for the most sensitive parts of the Chuitna watershed.

Few projects in Alaska history have presented the stark choice found at Chuitna: you can either support wild Alaska salmon and the habitat they need to endure, or you can favor salmon habitat destruction so Alaska can send low-grade coal to power China and other Asian economies.

You have promised numerous times you will "not trade one resource for another." The Chuitna coal strip mine is your opportunity to make good on your word.

Thank you for your attention to this pressing issue and we look forward to your timely response.

Very truly yours,



Judy Heilman, President
Chuitna Citizens Coalition



Bob Shavelson, Inletkeeper
Cook Inletkeeper

Cc: (VIA EMAIL ONLY)
Cora Campbell, ADFG
Dennis McLerran, EPA Region 10
Dianne Soderlund, EPA Alaska Operations
Geoffrey Haskett, USFWS
Doug McBride, USFWS
Samuel D Rauch III, NOAA
James Balsiger, NMFS
Doug Mecum, NMFS
Roland Maw, United Cook Inlet Drift Association
Paul Shadura, Kenai Peninsula Fishermans Association
Buck Laukitis, North Pacific Fisheries Association
Mark Vinsel, United Fishermen of Alaska

not limited to groundwater/surface water interactions, hyporheic zone impacts, climate change and hydrological watershed dynamics must be factored in to understand the ultimate effects on salmon and their habitat. We raise this point simply to highlight that your Administration recognizes mining through salmon streams at Canyon Creek is poor public policy, and we urge you to apply the same management philosophy to the Chuitna watershed.