



VIA EMAIL ONLY

Murray.Walsh@alaska.gov

February 28, 2014

Murray Walsh, Roads to Resources Manager
Alaska Department of Transportation & Public Facilities
PO Box 112500
Juneau, AK 99811-2500

RE: West Susitna Access Reconnaissance Study Transportation Analysis Report

Dear Mr. Walsh:

Cook Inletkeeper is an Alaskan organization dedicated to protecting water quality and salmon habitat throughout the Cook Inlet watershed. Please accept these comments on the West Susitna Roads Study on behalf of our Board, staff and more than 2500 members and supporters throughout Alaska.

As a preliminary matter, Inletkeeper notes the irony in providing government subsidies—through the study and possible construction of large road systems - to corporate interests that will reap the private benefits of such efforts. Alaska's oil, gas, hard rock and coal tax and royalty rates already provide significant incentives for investment, and the burden should not fall on Alaskans to further subsidize the profits of largely Outside corporations. If we truly are to embrace a market-based economy, then individual projects should stand or fall on the profitability of those projects, including transportation costs.

The Study team also made no effort to collect information from Alaskans who use and rely on the sustainable resources in and around the study area, and as a result, the Study rests wholly on a one-sided, extractive development perspective. The study team did not interview or collect any information from commercial fishermen, sports fishermen, Alaska Native Tribes, conservation organizations, hunters, trappers. Instead, only corporations – with a smattering of conversations with local government employees – inform the Study. This bias reflects an ongoing trend to dismiss everyday Alaskans from meaningful consideration in resource development decisions, and points us down a continuing path toward conflict and litigation.

Furthermore, the Study elevates the economic importance of extractive development, with little or no attention to the undeniable value in the sustainable natural resources that will invariably be destroyed by the proposed road projects. I will not labor to cite the litany of studies that show how road building, wetlands filling and water crossings adversely affect wild salmon and their habitat, but one need only look at the development patterns in the

Mat Su Valley – or in California, Oregon and Washington State - to understand the consequences of such thoughtless development. Furthermore, the Study makes no attempt to recognize the value of sport, commercial, personal use or subsistence harvests in the study area. If the State of Alaska has any desire to retain wild salmon runs in the coming decades, the Study should at a minimum map and quantify the types and amounts of fish habitat that would be lost from the various scenarios presented, and attach an economic value to them.

Finally, the Study highlights the opportunities surrounding coal development, yet fails to mention any deleterious effects from coal production and use, including climate change. Because Alaska is already reeling from the direct effects of rapid climate change, and because coal is a notoriously carbon-intensive industry, it's telling the Study refuses to mention atmospheric impacts. Furthermore, the Study fails to discuss the loss of fish and game habitat that will naturally flow from large scale open pit or strip mining. The state and the authors may dismiss these comments as beyond the scope of the Study, but these are precisely the types of considerations that should be reviewed at the reconnaissance level. Otherwise, plans and investments will unfold that lock in development scenarios that will destroy the magnificent natural legacy of the Susitna basin.

Inletkeeper research over the past decade shows marked warming trends in non-glacial salmon streams throughout the Cook Inlet watershed. We know from peer-reviewed science that such warming conditions create stress in cold water fish, such as salmon, and make them more vulnerable to pollution, predation and disease. Accordingly, ADOTPF and the people of Alaska would be best served if the state took a comprehensive look at potential impacts from large-scale road and industrial project development to try to avoid the pitfalls experienced in the Lower 48.

Yours for Cook Inlet,

A handwritten signature in black ink, appearing to read "Bob Shavelson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bob Shavelson
Inletkeeper