



VIA EMAIL ONLY

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May 23, 2019

Jason Brune, Commissioner  
Alaska Department of Environmental Conservation  
555 Cordova Street  
Anchorage, Alaska 99501

RE: ADEC's Capitulation to Industry & Toxic Dumping in Cook Inlet Fisheries

Dear Commissioner Brune:

Attached please find our comments recently submitted on the draft Clean Water Act permit for oil and gas industry dumping in Cook Inlet.

I can safely say in the 24 years I have been engaged in conservation issues in Alaska, ADEC's proposed permit for oil and gas wastes in Cook Inlet is the worst written, most scientifically indefensible permit I have ever seen.

You can review the attached comments to better understand the litany of serious problems with the permit, but suffice to say, it ignores basic science, contains flagrant violations of the law and treats Cook Inlet like a giant personal toilet for the oil and gas industry.

I expect better from ADEC under your leadership.

In your short time as Commissioner, ADEC has already come under heavy criticism for its anti-science approach to the PFAS drinking water contamination across the state. Now, your agency has proposed a permit for oil and gas discharges in Cook Inlet that turns science on its head, and makes a mockery of the state and federal laws and rules governing water pollution.

In fact, it appears ADEC did nothing more than ask the oil and gas industry what it wanted to dump into Cook Inlet, then back-calculated a permit to legitimize it. For example, ADEC's proposed permit increases the size of the mixing zone at Trading Bay more than 80%, creating a

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sacrifice zone nearly 3 miles long where ADEC allows industry to violate basic standards designed to protect Alaska's water, fish and people.

It's also important to recognize ADEC's actions here toss Alaska's states' rights under the bus of the federal government. The State of Alaska clearly has the authority to require zero toxic discharge standards in Cook Inlet – to protect our fisheries, to protect our waters and to protect human health - but it's chosen to cede our state powers to the feds. All too often we hear industry groups and politicians decry the heavy-hand of federal overreach, but in the case of toxic dumping in Cook Inlet, that hypocrisy apparently gets lost.

During your confirmation hearings, over two thousand Alaskans expressed serious concerns about your willingness and ability to apply facts and science to your permitting decisions. One commenter noted “[p]utting Brune at the helm here in Alaska will make it impossible for Alaskans to trust that fair, science based and honest decisions will be made in permitting for Pebble.”

So, the question becomes, if you're willing to ignore science and law with toxic industry dumping in Cook Inlet fisheries, what confidence should Alaskans have in your decisions regarding Pebble or any other project?

The answer to this question will define your tenure at ADEC, and I truly hope your past embrace of rigorous science and the rule of law prevail.

As always, I'm happy to meet at your convenience to discuss these and other matters.

Yours for Cook Inlet,

A handwritten signature in black ink, appearing to read "Bob Shavelson". The signature is fluid and cursive, with a prominent "B" and "S".

Bob Shavelson  
Inletkeeper

Enc. a/s