



VIA EMAIL ONLY
(candice.snow@alaska.gov)

January 25, 2012

Ms. Candice Snow
Alaska Department of Natural Resources
Division of Mining, Land and Water
550 West 7th Avenue
Anchorage, AK 99501

RE: THE ALASKA WET DOG RACE (LAS 28297)

Dear Ms. Snow:

I. Introduction

Cook Inletkeeper is a community-based nonprofit organization formed by Alaskans in 1995 to protect the Cook Inlet watershed and the life it sustains. Please accept these comments on the above-referenced project on behalf of Inletkeeper's more than 1200 members and supporters throughout southcentral Alaska.

II. Comments

As a threshold issue, the project proposal is not ready for public review. As a result, Inletkeeper will not devote significant time and energy to these comments until an application sufficient for review reaches public comment.

The size and scale of the proposed effort promises sweeping impacts on ocean and coastal resources throughout the project range. Other than superficial information about possible impacts and a cursory map, the public is left with little or no substantive information on which to base meaningful comments. For example, the application contains no substantive information to understand the far reaching impacts that will occur in the various state and federal refuges and critical habitat areas included within the project area, and on the many fish and game resources relying on those protected areas.

Jet-craft are renowned for their exceptional speeds, yet the proposal pays little heed to the inevitable marine mammal and bird strikes that would flow from such an endeavor, and contains no information suggesting the state and federal agencies with jurisdiction over such resources have been engaged and consulted. Additionally, the application wholly ignores the vast range of impacts that will flow not only from the armada of speeding jet-craft, but also from the massive array of support vessels and personnel needed to sustain such a venture, including such issues as oil and fuel spills, tideland and intertidal habitat impacts, human waste and garbage, and

disruption of marine mammal and bird populations. Finally, the proposal route would include a procession of jet craft up a major Alaskan salmon stream, and the proposal contains virtually no discussion on the implications of such activities for water quality or fish habitat.

It's clear from the breadth and scope of this project proposal, and the myriad state and federal resources it will affect, that other agencies, including NOAA, NMFS, USFWS, EPA, ADEC and ADFG must provide input and review pursuant to a variety of laws, including but not limited to the Endangered Species Act, the Clean Water Act, the Marine Mammal Protection Act, the Magnuson-Stevens Act and the Alaska Fish Act. Furthermore, due to the broad implications for public resources and uses in the proposed project area, DNR should hold public hearings in affected communities to ensure the local communities which will bear the burden of the project impacts will be fully informed.

The Department of Natural Resources routinely touts the state's so-called rigorous permitting system, yet the fact DNR allowed this application to go to public review strongly belies any notion of meaningful project review. As projects such as Pebble and Chuitna move further into the permitting process, and in the wake of yet another embarrassing revelation involving the state's habitat protection agency, public confidence in the state's capacity to honestly and fairly adjudicate project proposals is ebbing. As a result, Inletkeeper strongly encourages DNR to reject this project application, conduct the necessary reviews and public hearings, and take a hard look at the undeniable impacts such a project will entail.

III. Conclusion

Thank you for your attention to these comments and please do not hesitate to contact me if you have any questions.

Very truly yours,



Bob Shavelson
Inletkeeper

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