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Growing Alaska Through Responsible Resource Development

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BREAKFAST MEETING

Thursday, December 4, 2014

1. Call to order – Ralph Samuels, President
2. Head Table Introductions
3. Staff Report – Rick Rogers, Executive Director
4. Program and Keynote Speaker:

Nuclear Energy: Pursuing Low Cost Energy in Alaska

Marvin Yoder

Author and former local government administrator

Next Meeting:

Thursday, December 18: TBA

Please add my name to RDC's contact list:

Name/Title: _____

Company: _____

Address: _____

City: _____ State: _____ Zip: _____

E-mail: _____ Phone: _____

ACTION ALERT

Outer Continental Lease Sale 193 SEIS

Deadline for Comment: Monday, December 22nd

Public Hearings: Anchorage: Monday, December 1st, Fairbanks: Thursday, December 4th

Despite repeated calls from the American public to increase domestic oil and gas production and widespread support for development on Alaska's Outer Continental Shelf, access to our abundant U.S. Arctic offshore resources remains uncertain.

Recently, the federal Bureau of Ocean Energy Management (BOEM) issued another draft Supplemental Environmental Impact Statement (SEIS) for Chukchi Lease Sale 193, following litigation that required the agency to revise its study.

On November 7, 2014, BOEM initiated a 45-day public comment period for its draft SEIS on Lease Sale 193. Swift finalization of this document and reaffirmation of the lease sale is critical to preserving the opportunity to explore for Arctic resources. Leaseholders have waited more than five years; it's time for the federal government to move forward.

Energy development in Alaska has long faced significant opposition, and opposition groups are mobilizing to generate tens of thousands of comments on this issue. Therefore, supportive comments to BOEM are critical to ensuring that Lease Sale 193 moves forward. Please support greater domestic energy production by writing to BOEM and expressing support for Lease Sale 193. The comment period closes on December 22, 2014.

Action requested:

A 45-day public comment period is currently underway and it will end Monday, December 22. During this time, BOEM will hold five public hearings in Northwest Alaska and the North Slope and one hearing in both Anchorage and Fairbanks. RDC encourages its members to participate in the process by submitting comments and presenting brief testimony at a public hearing. BOEM will accept comments on the SEIS through regulations.gov. The Draft Supplemental EIS is available at: www.boem.gov/ak193/

In submitting your written comments at regulations.gov, in the field entitled, "Enter Keyword or ID," enter BOEM-2014-0078, and then click "search."

SCHEDULE FOR PUBLIC HEARINGS (all hearings scheduled for 7 p.m. Alaska time)

Dec. 1: ANCHORAGE -- Crowne Plaza Hotel, 109 W International Airport Rd. (This hearing was originally scheduled to be held at the Loussac Library)

Dec. 3: BARROW -- Ilisagvik College

Dec. 4: FAIRBANKS -- Westmark Hotel

Points to consider in your comments and verbal testimony:

- The Bureau of Ocean Energy Management should expeditiously finalize the Supplemental Environmental Impact Statement for Lease Sale 193, reaffirm Lease Sale 193, and allow exploration activities to proceed.
- Lease Sale 193 has undergone exhaustive environmental review, and BOEM has once again acknowledged that exploration can be done with minimal environmental impact. Alaskans have proven that resource development can proceed in a way that protects the environment while providing economic benefits and improving the standard of living for Alaskans, especially those living in the Arctic.

- Alaska has enormous untapped oil and gas potential, especially in its offshore areas. The Chukchi Sea, off Alaska's northwest coast, offers more resources than any other undeveloped U.S. energy basin, and, according to experts, may be one of the largest untapped oil and gas sources in the entire world.
- An assessment by the U.S. Geologic Survey concludes that about 30% of the world's undiscovered natural gas and 13% of its oil are located above the Arctic Circle, with Alaska holding enough oil and natural gas to maintain production for "many years to come."
- A 2014 poll found that 73 percent of voters in Alaska support OCS development.
- There has never been a blowout in the Alaskan or the Canadian Arctic. Since 1971, 84 wells have been drilled in the Alaska OCS – all without incident. For drilling planned in the Chukchi, the water depth is rather shallow – several hundred feet – and is akin to the near-shore shallow-water Gulf of Mexico, where safe drilling practices have led to a long history of safe operations.
- The North Slope and its offshore are now perhaps the most studied energy basins in the United States. In the past decade, over 250 studies have been funded in the Arctic, with the majority focused on the Beaufort and Chukchi Seas.
- Chukchi oil and gas resources are key to sustaining the Trans-Alaska Pipeline System (TAPS) and protecting U.S. energy security.
- TAPS is one of the largest pipeline systems in the world and has transported more than 17 billion barrels of oil since it came online in 1977. At its peak, TAPS carried approximately 24 percent of domestic production to market ensuring West Coast residents received a stable supply of domestic energy.
- Due to declining rates of oil production in the onshore North Slope region, the pipeline now carries an average of 540,000 barrels per day – down from peak levels of nearly 2 million barrels a day in 1988. Offshore resources are desperately needed to fill the pipeline and keep TAPS flowing for decades to come.
- A 2009 study by University of Alaska's Institute of Social and Economic Research and Northern Economics found that new offshore energy production in the State of Alaska would produce an annual average of 35,000 jobs – both directly and indirectly tied to the industry - over the next 50 years for Alaska alone, with a total payroll of \$72 billion over the 50-year period.
- A follow-up study in 2011 by the University of Alaska's Institute of Social and Economic Research and Northern Economics estimated that the jobs and revenue impact from Alaska OCS development on the lower-48 states would be even greater. Economic activity resulting from OCS development in the Beaufort and Chukchi Sea could generate an annual average of 54,700 jobs nationwide, with an estimated cumulative payroll amounting to \$145 billion over the next 50 years.
- Moreover, revenues generated from the development of Chukchi and Beaufort oil and natural gas resources could amount to \$193 billion in revenues to federal, state and local governments over a 50-year period.
- Since 2005, 680 leases have been awarded to companies interested in exploring for oil & gas off the Alaska coasts. Despite years of applications for permits, community consultation, environmental studies and analysis, and more than \$3 billion in bonus payments to the federal government and investment in technology, equipment and personnel, not one well has been drilled to hydrocarbon depth as a result of Lease Sale 193.

- When the federal government awards a lease and accepts payment, it has an obligation to efficiently process permits within a reasonable time period.
- The current regulatory structure and legal gamesmanship are preventing America's ability to access and develop some of its most promising natural resources at a time when America needs jobs, economic growth, reduced dependency on foreign energy sources and a dependable supply of affordable energy.

Testimony of Rick Rogers
Executive Director
Resource Development Council
On SEIS for Lease Sale 193
Anchorage, Alaska
December 1, 2014

Good evening. My name is Rick Rogers, Executive Director of the Resource Development Council for Alaska, Inc.

RDC is a statewide organization made up of all resource sectors, business associations, labor unions, Native corporations, tourism providers, local governments and individuals. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

Lease Sale 193 has undergone thorough environmental reviews and the Bureau of Ocean Energy Management has once again acknowledged that exploration can take place in the offshore waters of the Chukchi Sea with minimal environmental impact. RDC is confident that exploration, development, and production of oil and gas resources can occur in the lease area in a responsible manner that protects the environment while providing immense economic benefits and improving the standard of living for not only Arctic residents, but all Alaskans.

Offshore development on current leases will provide much-needed jobs and revenues to Alaskans. In addition to boosting economic growth, Alaskan offshore development will help extend the life of the Trans-Alaska Pipeline, which continues to play a critical role in our nation's energy security.

The Alaska OCS is an important future source of U.S. energy supply. The potential reserves offshore Alaska is more than all the current total proven U.S. conventional oil reserves. Although domestic production has sharply increased over the past several years, America is still importing significant volumes of oil at a great cost. Development of Alaska's Arctic resources would further reduce America's reliance on foreign oil. It would also generate hundreds of billions of dollars in government revenues.

The industry purchased leases in the Arctic in good faith, and Shell alone has spent more than \$6 billion on purchasing its leases and preparing to drill. After waiting more than five years, leaseholders should be allowed to proceed with exploration efforts.

Alaskans agree that exploration, development, and production of offshore Arctic energy resources should move forward. In a recent poll, 73 percent support OCS development.

In conclusion, the Arctic, both onshore and offshore, is now perhaps the most studied energy basin in the U.S. More than 250 studies have been funded, with the majority in the Beaufort and Chukchi Seas. Moreover, this area was safely explored and

drilled more than 20 years ago.

RDC urges the Bureau of Ocean Energy Management to expeditiously finalize the SEIS, reaffirm Lease Sale 193, and allow exploration to proceed.

Thank you.

ACTION ALERT

Overview:

The Tongass Advisory Committee (TAC) held its fourth meeting in Sitka to continue discussions regarding a transition from primarily old growth to predominantly young growth timber harvest on the Tongass National Forest. During a three-day meeting, the committee discussed key issues that may inform the Tongass Land Management Plan Amendment.

The TAC identified areas of common understanding, including the need for a predictable supply of young growth timber; the importance of preserving infrastructure and expertise appropriate to the pace and scale of implementation of the Forest Plan Amendment; and the potential role for old growth timber harvest through the transition and for future niche markets.

Action Requested

The Committee heard robust public comment both in person and in writing from special interest groups and others urging for a movement away from logging in the Tongass. Given the committee welcomes continued engagement from the public, RDC encourages its members to provide positive comment supporting the timber industry to counter the large volume of anti-timber comments received. Written comments should be submitted to Jason Anderson, Designated Federal Officer, Tongass National Forest, P.O. Box 309, Petersburg, Alaska 99833. Comments may also be submitted via email to jasonanderson@fs.fed.us or via fax to 907-772-5895.

Points to consider for your comments

- The timber industry has long played a key role in the economy of Southeast Alaska. A stable timber industry is an essential part of a balanced Southeast Alaska economy.
- Access to renewable energy resources, timber, mining, recreation, subsistence, and tourism has been severely limited by the 2008 Amended Forest Plan.
- Southeast Alaska benefits from many aspects of healthy forest management that includes a vibrant timber industry.
- If the Southeast Alaska economy is to continue to grow and strengthen, an increase in the size of a sustainable timber industry is essential.
- With 17 million acres, there is room in the Tongass for the residents of Southeast Alaska to earn a living on their lands.
- The residents employed in the Tongass timber industry add socio-economic value and benefits to local communities. A diverse economy is essential to the region's long-term sustainability.
- Last year the timber industry in Southeast Alaska directly supported 325 direct jobs, and \$17 million dollars in wages. With an average wage nearly \$10,000 higher than the average private sector wage, these are important jobs that support families and communities.
- The timber industry also supported 105 federal jobs last year, with an associated payroll of \$8 million.

- Using a jobs and wages multiplier of 1.5, the total economic impact of the timber industry in Southeast Alaska last year was 645 jobs and \$37.5 million in wages.
- These are jobs and wages that disproportionately go to smaller, less wealthy communities, underscoring the fact that these are jobs are critical to the economy.
- The practice of silviculture, coupled with ongoing scientific research, helps protect and nourish the forest ecosystem. Modern silviculture practices help ensure the tradition of land stewardship will be passed down to future generations.
- The timber and wood products industry of today is one that is operating at a high level of environmental stewardship.
- Logging and restoration contracts are being carried out with a high level of integrity by experienced Southeast Alaska men and women that care about the region.
- Southeast Alaska's timber workers have shown that timber harvesting can go hand in hand with wildlife protection and that forest practices can be implemented to protect cultural resources, enable wildlife, and improve the social well being of the region and communities.
- Despite the movement towards a transition to young growth, in order to be economically viable the industry relies on old growth timber to form the backbone both for local milling and log export programs.
- Although a transition is underway, it will take 20-30 years before the Tongass can reasonably transition to young growth.
- The time period of the transition from old growth to second growth should be modified to allow the bulk of second growth stands on the Tongass to achieve their Culmination of Mean Annual Increment (CMAI) as required by the National Forest Management Act.
- In the interim, economic old growth timber harvests should be allowed in a volume sufficient to meet market demand for an integrated timber industry.
- It is not enough to transition away from old growth without transitioning to a new economically viable industry. The levels and locations of young growth are not yet robust enough to support an industry. Old growth harvests must be continued until the time that transition to new growth is practical.
- A transition to young growth harvesting is going to require an investment in new equipment and practices. The USDA needs to pioneer economically sustainable markets in young growth products, provide resources for private industry to transition, and somehow guarantee private industry that making these investments is going to be economically beneficial in the long term
- In order to support a viable timber manufacturing industry, there must be sufficient timber supply to allow local mills to make a profit.
- The current Tongass Land Management Plan (TLMP) has a maximum allowable timber sale level of 267 million board feet (mmbf) annually. In 2013, just 16 mmbf were sold in the Tongass.
- Approximately 85% of all timber sales in the past 20 years have been halted or delayed by lawsuits
- An analysis of the last 51 lawsuits on timber sales in the Tongass show that these lawsuits cost the Federal government nearly \$100 million (after adjusted for inflation) simply to carry out the NEPA process that these lawsuits trigger—at an average cost of nearly \$2 million each. These figures don't include the cost of lost business, bankruptcies, or the lost earning potential of the region's workforce.

- Of all the number of acres logged in Southeast Alaska over the past 60 years, only 2.5% of the Tongass has ever been cut since the industry began in earnest in the 1950's.
- The ultimate closure of the pulp mills and sawmills and the resulting loss of jobs was caused by a lack of timber supply, not markets.
- Despite the size of the Tongass, the 2008 Tongass plan allows potential harvest on only 663,000 acres, about half of which is young-growth currently too young to harvest responsibly.



NOAA FISHERIES

NEWS RELEASE

December 2, 2014

Julie Spegle, 907-586-7032 w., 907-321-7032 c.

NOAA FISHERIES PROPOSES ARCTIC RINGED SEAL CRITICAL HABITAT, SEEKS PUBLIC COMMENT

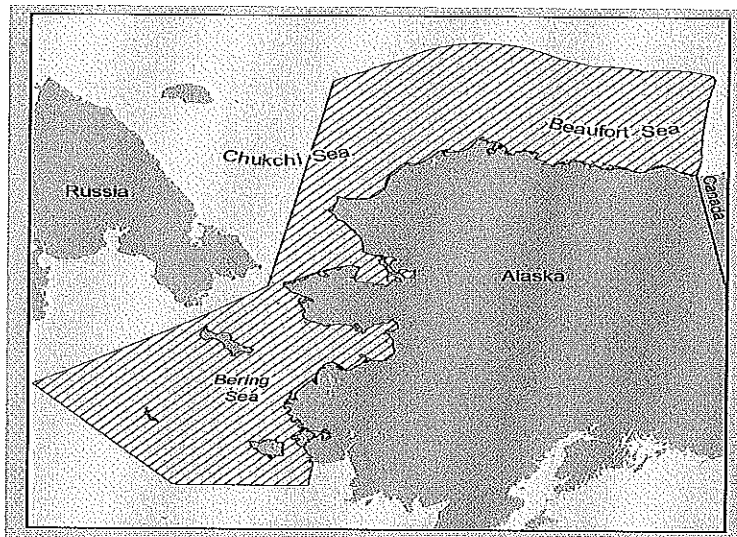
In December 2012, NOAA Fisheries declared four subspecies of ringed seals, including the Arctic ringed seal in Alaskan waters, as threatened or endangered under the Endangered Species Act (ESA). After extensive input from local and state governments, Native partners, and the public to determine proposed critical habitat areas, NOAA Fisheries today is releasing those proposed designations for public comment. The proposed critical habitat designation includes no regulatory restrictions, only a consultation requirement for federal agencies. Arctic ringed seals are also protected under the Marine Mammal Protection Act.

The proposed critical habitat area in the northern Bering, Chukchi, and Beaufort seas provides sea ice conditions that are essential for the survival of Arctic ringed seals. The designation of critical habitat areas, land or water under United States jurisdiction that includes habitat features essential to the conservation of a threatened or endangered species, is required for species listed under the ESA.

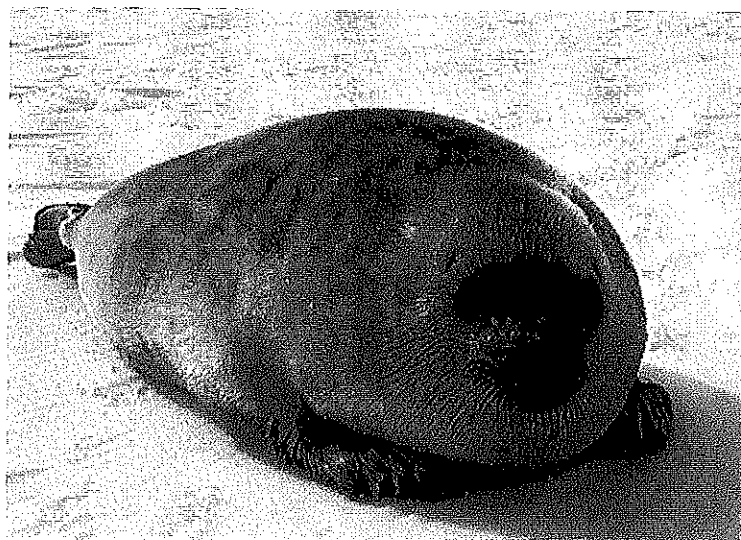
"After reviewing the best available information, our scientists identified the habitat features that are essential for sustaining Arctic ringed seals--a species that is likely to become endangered in the foreseeable future due to climate change," said NOAA Fisheries Alaska regional administrator Dr. James Balsiger. "We look forward to hearing from members of the public on this proposal."

Ringed seals nurse and protect their pups in snow caves, which are threatened by late ice formation in the fall, rain-on-snow events in the late winter, earlier break-up of spring ice, as well as decreasing snow depths, which are projected to be too shallow for snow cave formation by the end of the century. Ringed seals also rely on sea ice for extended periods during molting, breeding, whelping, and nursing. Scientific evidence shows that sea ice is projected to shrink both in extent and duration in the future.

A critical habitat designation must be supported by a full analysis of economic, national security, and other impacts. In 2012, the President directed that any future designations of critical habitat carefully consider all public comments on relevant science and economic impact, including those that suggest methods for minimizing regulatory burdens. NOAA Fisheries is releasing its draft analysis of these impacts for review during the comment period. NOAA Fisheries is also seeking input on whether any particular areas should be considered for exclusion from the proposed critical habitat.



Map of proposed critical habitat



Upon designation of a critical habitat area, federal agencies are required to consult with NOAA Fisheries on actions they

Photo of Ringed Seal

authorize, fund, or carry out to ensure their actions are not likely to destroy or adversely modify critical habitat. Designation of critical habitat would not affect subsistence harvest of ringed seals by Alaska Natives.

There will be a 90-day public comment period on the proposal and NOAA Fisheries will soon announce locations and times for public hearings. The agency will consider comments received as it develops the final critical habitat designation.

The public may submit comments, identified by FDMS Docket Number NOAA-NMFS-2013-0114, via the Federal e-Rulemaking Portal at www.regulations.gov

NOAA Fisheries will also accept written comments addressed to: Jon Kurland Assistant Regional Administrator for Protected Resources Alaska Region NMFS Attn: Ellen Sebastian P.O. Box 21668 Juneau, AK 99802-1668

For more information, visit <http://alaskafisheries.noaa.gov/protectedresources/seals/ice.htm>

NOAA's mission is to understand and predict changes in the Earth's environment, from the depths of the ocean to the surface of the sun, and to conserve and manage our coastal and marine resources. Join us on Twitter, Facebook, Instagram and our other social media channels at <http://www.noaa.gov/socialmedia>.

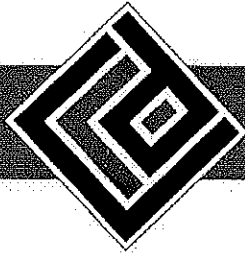
To learn more about NOAA Fisheries in Alaska, visit alaskafisheries.noaa.gov or www.afsc.noaa.gov.

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Mike Satre
Keith Silver
Lorall Simon
Doug Smith
Phil Steyer
John Sturgeon
Casey Sullivan
Jan Trigg
Doug Ward
Sinclair Wilt
Ex-Officio Members
Senator Lisa Murkowski
Senator Mark Begich
Congressman Don Young
Governor Sean Parnell

November 14, 2014

Water Docket
Environmental Protection Agency
Mail Code 2822T
1200 Pennsylvania Avenue NW.
Washington, D C 20460

Re: Attention: Docket ID No. EPA-HQ-OW-2011-0880

Via regulations.gov

To Whom It May Concern:

The Resource Development Council for Alaska, Inc. (RDC) is writing to comment on the U.S. Environmental Protection Agency's (EPA) and the U.S. Army Corps of Engineers (Corps) proposed rule defining the scope of waters protected under the Clean Water Act (CWA).

RDC is an Alaskan business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, tourism and fisheries industries. RDC's membership includes Alaska Native Corporations, local communities, organized labor, and industry support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

RDC urges the EPA and Corps to withdraw the proposed rule for "water of the United States." (WOTUS), and halt efforts to further expand the EPA's jurisdiction of areas in Alaska and across the United States. RDC has many concerns regarding the proposed rule, including many Alaska-specific issues, as well as broader concerns at the national level.

As the CWA triggers the onerous permitting process for areas in Alaska considered "waters of the U.S.," RDC is further concerned the broad expansion that will likely result from this proposed rule will devastate the Alaskan economy.

The expense and uncertainty in the process for obtaining a permit under the CWA discourages investment in Alaska, a place where the cost of doing business is already high and the extreme weather conditions often delay or impact projects. The proposed rule would significantly expand the scope of navigable waters subject to Clean Water Act jurisdiction by regulating small and remote waters – many of which are in Alaska.

The proposal is too fluid, and asserts federal control over waters that were under jurisdiction of Alaska and each individual state. Ultimately, WOTUS includes wetlands, creeks, ponds, lakes, sloughs, and other wet areas. More resource and community

development projects will be subject to additional lengthy and expensive federal permitting, likely without added benefit to the environment.

Background

Alaska contains approximately 174 million acres of wetlands¹ (65% of the nation's total), with nearly 80% of the state underlain in permafrost. RDC is concerned about the potential vast consequences the proposed rule to define "waters of the United States" will have because of the immense wetlands and permafrost.

Alaska has 63% of the nation's jurisdictional waters and is one-fifth of the U.S. land mass, yet EPA's analysis for the definition of WOTUS rule making did not include adequate analysis of Alaska. RDC is further concerned the rule will result in disproportionate impacts to Alaska, and the agencies should address the flawed economic analysis described in the rule. RDC's members, from oil and gas, to maritime, Alaska Native corporations, and rural communities, will be unreasonably burdened by this proposed rule. Alaska and other states should have the authority to develop land use practices and protections, not the federal government.

Clarifications and definitions

The following is an example of areas in the proposed rule where further clarity is necessary, as well as defined examples for terms:

- The rule introduces terms such as "tributary," "riparian area," and "flood plain" and then defines these terms extremely broadly, likely inferring large amounts of intrastate land and waters are always within the agencies' authority.
- The technical definition of permafrost as "soil and/or rock that has remained below 32°F for more than two years, regardless if significant amounts of ice exist or not" will likely cause confusion for Alaska when considering how EPA and the Corps use it to define WOTUS.
- The definition of a "significant nexus" remains unclear, and should have a specific definition applicable to the distinct characteristics in Alaska. Additionally, "floodplain" and "adjacent waters" should be clearly defined, as a "floodplain" could encompass all of the North Slope.
- The rule should offer clarity on ditches and trenches, as well as snowpack, artificial ponds, and ephemeral streams.
- In regards to "permafrost," as the larger part of Alaska is considered permafrost, clarify if the inclusion of permafrost would then put even more of Alaska under the CWA permitting regime.
- Whether or not the rule would make industrial ditches into "tributaries," where maintenance activities in ditches and other "tributaries" would trigger costly dredge and fill permits.

Equally important is the inclusion and use of the best available science, as well as research that includes temperate regions and is reflective of connections in an arctic environment.

Instead of allowing the science to be developed, peer-reviewed, and released for public review, the EPA compiled a Draft Report on the Connectivity of Waters while developing this proposed rule. The draft scientific report was released for public comment at the same time the EPA released the rule to the Office of Management and Budget for inter-agency review. The Science Advisory Board had not finished its peer review, and the public already began commenting.

¹ Source: http://water.epa.gov/grants_funding/wetlands/facts/upload/alaska.pdf

Existing permits and regulations

The EPA and Corps should evaluate the potential impacts approval of the proposed rule will have on existing permits and permit stipulations. The evaluation should be published with potential opportunities for mitigation.

Given Alaska's unique conditions, any revised or new guidance provided by the Corps should include regional guidance with examples or case studies. Development of regional guidance should include broad participation in the process from the regulated and regulatory communities. Likewise, the revised form the Corps and EPA are developing for field regulators for documenting the assertion or delineation of CWA jurisdiction should be specific to Alaska. Development of both national and regional forms should be a public process, open to review and comment.

Agency guidance should recognize Alaska's unique circumstances. While scarcity is an overriding concern elsewhere in the nation, the sheer abundance of wetlands in Alaska is an important element to take into consideration. Further, Alaska is a state with substantial, remote wetlands. Often there are challenges associated with identifying a nexus to traditional navigable waters, especially in ice-rich regions. The limited field season and the lack of understanding of functions for some types of Alaskan wetlands are two other challenging elements that should be recognized.

Additionally, the proposed rule creates more confusion. It does not streamline the process, or provide permitting clarity.

State jurisdiction

The State of Alaska should continue to have existing jurisdiction of waters without a new, additional level of bureaucracy such as this proposed rule.

In the CWA, Congress granted the Corps and the EPA jurisdiction over "navigable waters," defined in the Act as "waters of the United States" without further clarification. The Act grants that all waters not regulated by the federal government fall under the jurisdiction of state and local governments for protection.

Maps prepared by the EPA show that the rule will expand federal jurisdiction over waters from 3.5 million river and stream miles to well over eight million river and stream miles, much of which is in Alaska.

Cost of permitting to public and private sectors

According to the Waters Advocacy Coalition, private and public sectors spend \$1.7 billion a year to obtain Section 404 permits. The timeline to obtain a 404 permit through the Corps takes an estimated 788 days, with an average cost of over \$271,000, excluding additional expenses such as mitigation.

Expanding jurisdiction will cause delays and increase construction costs. Expanding federal authority over water and land use will increase the number of projects required to obtain a federal clean water act permit. The expanded federal permitting process will slow economic growth by increasing the cost of and delay necessary improvements to the public and private infrastructure that forms the foundation of our nation's economy, such as: highways, bridges, airports, schools, and drinking and waste water facilities.

In addition to increased permitting costs, the cost of implementing expansion of the 404 section will unnecessarily increase the federal government budget.

Impacts to future infrastructure, rural Alaska

Alaska, being a relatively young state with vast lands and few inhabitants, is mostly undeveloped. Alaska lacks critical infrastructure for community and resource development. RDC is concerned the proposed rule will further impact projects, given most of Alaska's non-mountainous lands are or would be considered wetlands.

Rural Alaska, which has a vital need for improved infrastructure and projects, such as roadways, power lines, and pipelines, will have to obtain additional permits and be under greater, yet unnecessary scrutiny in order to be approved. RDC notes the impact will disproportionately affect rural Alaska, and in particular, Alaska Natives.

Furthermore, much of Alaska's lands are already owned by the government, with less than one percent in conventional private ownership. As a large percent of wetlands is under public management, it's likely not to be available for development nor for compensatory mitigation.

Under the proposal, even if a project can get a permit, businesses will likely have to agree to costly restoration and/or mitigation projects. Moreover, the proposal does little or nothing to actually improve water quality. Instead, it gives EPA and the Corps virtually limitless authority to control community and development projects, especially in Alaska. This proposed rule is seriously legally flawed and again, RDC urges EPA and the Corps to withdraw it.

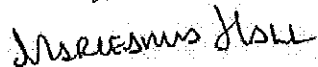
Conclusion

In addition to the concerns listed in this letter, RDC urges you to consider and address the comments of the Waters Advocacy Coalition, National Mining Association, American Exploration and Mining Association, the Energy Producing States Coalition, and the U.S. Chamber of Commerce. These organizations have submitted extensive technical comments detailing issues with legality, clarification, and implementation, and RDC urges you to consider their recommendations.

If ultimately necessary, and to develop a balanced rule to continue to protect wetlands, RDC urges the EPA and Corps to meet with Alaskans and stakeholders in other states. These groups can help the EPA and Corps better understand what is already in place and effectively working in each state, while protecting the livelihood of Americans. It is in the best interest of all Alaskans to protect the lands and waters within Alaska's borders.

RDC urges the EPA and Corps to improve and clarify the proposed rule to avoid litigation and unintended consequences. In an effort to provide a better understanding of the potential impacts to Alaska, RDC appreciates continued communications and opportunities to comment on the proposed rule.

Sincerely,



Marleanna Hall
Projects Coordinator

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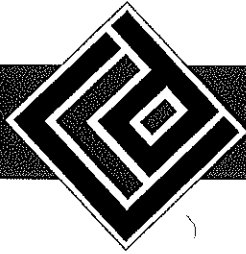
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Growing Alaska Through Responsible Resource Development

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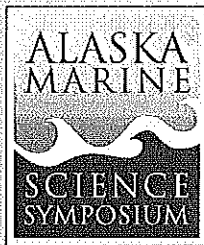
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WHO IS YOUR

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Nominations open through December 8th



**Marine Research Award
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*To be awarded at the
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THE ALASKA
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**Lifetime Achievement Award
Stewardship and Sustainability Award
Ocean Youth Award**

*To be awarded at the
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February 21, 2015*



**To make a nomination for any
of these awards please contact
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THE ALASKA
*Marine
Gala*

**Nominations open
through December 8th
2015 Alaska Ocean
Leadership Awards**



The Alaska Ocean Leadership Awards were established as annual awards to encourage and give recognition to outstanding achievements related to ocean sciences, education and resource management in Alaska.

To be awarded at the Alaska Marine Science Symposium ~ January 19, 2015

Marine Research Award

\$1000 cash prize

Sponsored by: Drs. Clarence Pautzke
and Maureen McCrae

Awarded to a scientist, team of scientists or an institution that is acknowledged by peers to have made an original breakthrough contribution to any field of scientific knowledge about Alaska's oceans.

2010 Recipient: Dr. Gordon Kruse

2011 Recipient: Dr. Jeremy Mathis

2012 Recipient: Jan Straley

2013 Recipient: Drs. Katrin Ilken, Brenda Konar, Russ Hopcroft and Bodhil Bluhm

2014 Recipient: Dr. Tom Weingartner

Marine Science Outreach Award

(Formerly Ocean Literacy and Ocean Media Awards)

\$1000 cash prize

Co-Sponsored by: Alaska Ocean Observing System
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Awarded to a person, team or organization that has made an outstanding contribution to ocean literacy via formal or informal education, media or other communications about Alaska's marine ecosystems.

Ocean Literacy

2010 Recipient: Kenai Fjords Tours

2011 Recipient: Marine Science Explorer Program

2012 Recipient: Elizabeth Trowbridge - CACS

2013 Recipient: Kurt Byers & Sea Grant Staff

2014 Recipient: Bonita Nelson

Ocean Media

2010 Recipient: Elizabeth Arnold

2011 Recipient: Marine Conservation Alliance

2012 Recipient: Deborah Mercy

2013 Recipient: Thomas Litwin and
Lawrence Hott

Marine Science Outreach

2014 Recipient: Laurie "Poppy" Benson

To be awarded at the Alaska Marine Gala ~ February 21, 2015

Walter J. & Ermalee Hickel's

Lifetime Achievement Award

\$1000 cash prize

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Awarded to an individual or institution that has made an exceptional contribution to management of Alaska's coastal and ocean resources over a period of 20 or more years.

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2011 Recipient: Dr. Clarence Pautzke

2012 Recipient: Caleb Pungowiyi

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Awarded to an industry initiative that demonstrates the highest commitment to sustainability of ocean resources.

2010 Recipient: The Marine Conservation Alliance

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2013 Recipient: Holland America Line

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