



# Alaska Conservation Alliance

## *Uniting for Alaska's Future*

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### **Alaska Natural Gas Pipelines Position Paper**

(Revised 10-9-09)

The Alaska Conservation Alliance (ACA), an umbrella organization comprised of 40 member groups with a combined membership of 38,000 Alaskans, supports an environmentally appropriate natural gas pipeline project.

ACA believes that the United States and the world must actively pursue the development and integration of new energy sources that are clean and renewable in order to strengthen the U.S. economy, reduce dependence on foreign sources of energy, and to reverse global climate change, which is threatening our way of life. Alaska is in a unique position to help shape the energy future of the U.S. while maintaining Alaska's prosperity. Alaska's natural gas, if directed to the United States, can be an essential bridge to a secure, clean energy future.

Integral to Alaska retaining its position as an energy state is the urgent need to begin developing and investing in renewable energy projects throughout Alaska; from geothermal in the Aleutians to wind in the Arctic. If pursued in a timely and vigorous manner, ACA believes that Alaska can be a leader in renewable energy technology and expertise as we are in oil and gas development, and that we can export that energy, technology, and expertise to other northern countries and regions.

Alaska's natural gas supplies are a valuable commodity for its citizens. While not a renewable energy source, natural gas is cleaner burning than other fossil fuels, such as coal, and can provide feedstock and financial capital to spur further innovation in renewable energy. Furthermore, the Prudhoe Bay field has an estimated 23 trillion cubic feet of gas – an amount equal to approximately one-sixth of all U.S. proven reserves and slightly less than two years' worth of nationwide consumption at current levels – and those reserves can be delivered to market while avoiding the controversies associated with gas development in frontier areas and on private land.

In order for the residents of Alaska to be fully engaged in this critical project, full disclosure and transparency is essential. A successful pipeline project will require full and open discussion among lawmakers and the Alaska public, with a range of proposals and potential routes for the pipeline available for serious consideration. Only by comparing proposals and engaging the public can we select the best alternative for Alaska.

Global climate change and ocean acidification are having, and will continue to have, profound impacts on Arctic coastal and marine ecosystems and the people who depend on them. The dramatic decline of seasonal ice cover is also rapidly opening the region to

industrialization that has been absent in the region. Additional stresses to Arctic ecosystems from climate change and lack of a full scientific assessment of the health, biodiversity, and functioning of them means that greater scrutiny of industrial activities is needed, especially development in the Arctic Ocean.

Building on the wisdom of Governor Hammond’s criteria for supporting resource development projects in Alaska and the recognition that a sound economy and a sound environment go hand in hand, ACA has developed six principles and sets of questions to guide our support for Alaska Natural Gas Pipelines, which:

1. Minimize environmental impacts.
  - Does the entire project use best practices for project infrastructure and activities that incorporates adequate reduction of greenhouse gas emissions?
  - Does the project design avoid, where possible, the environmental impacts of project infrastructure and activities?
  - Does the project protect subsistence resources and minimize impacts on local communities?
  - Are Alaska’s public trust resources, such as water, fish, and wildlife, adequately protected?
  - Will the gasline avoid frontier wilderness areas? (We do not support the “over-the-top” route offshore to the Mackenzie River Delta.)
  - Does the project require Best Available Technology<sup>1</sup> and Best Management Practices<sup>2</sup>?
  - Are sufficient funds to be escrowed for Dismantling, Removal and Restoration (DR&R) of natural gas pipelines so that regulatory agencies can ensure that the corridor is restored to its original condition as facilities are taken out of service?
  
2. Protect Alaska’s wild lands and the integrity of parks, refuges, critical habitats, preserves and conservation areas.
  - Do gasline projects – including gas field sources – avoid all established conservation areas, habitats critical to wildlife, and other sensitive areas, including the Beaufort and Chukchi Seas?
  - Does the proposal strive to develop Prudhoe Bay gas within the existing development area, including existing pipeline corridors?
  - Does the project protect the integrity of the Arctic Seas for subsistence resources and access, critical wildlife habitats and populations?
  
3. Provide maximum benefits to the citizens of Alaska.

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<sup>1</sup> Best Available Technology, for purposes of this document, is the most environmentally protective technology that is readily available without regard to traditional “cost-benefit” analysis.

<sup>2</sup> Best Management Practices, for purposes of this document, are the policies, practices, or structures which prevent (as the primary option) or reduce (as the secondary option) pollution or other forms of environmental harm.

- Will the State of Alaska receive an adequate share of revenues from the project?
  - Will there be a Project Labor Agreement (PLA) ensuring skilled workers receive fair wages and will Alaska Natives receive a fair share of jobs?
  - Will there be Best Value Contracting<sup>3</sup> for the construction and maintenance of the gasline?
  - Will the project deliver low-cost gas to Alaska communities?
4. National Need
- If gas is exported out of AK, will it supply a national need for natural gas for the US?
  - Does helping to meet lower 48 gas supplies minimize overall greenhouse gas emissions to reduce the effects and impacts of climate change?
5. Provide incentives for development of clean and renewable sources of energy.
- Are there mechanisms for increased research and development of renewable energy production, storage, and delivery technologies?
6. Provide for full and open public participation, review and comment in all project stages, including planning, construction, operation, and decommissioning.
- Will there be a role for a permanent, adequately funded, independent formal citizens' advisory board?
  - Has the public been engaged and fully informed regarding the project proposal and all terms, conditions, and impacts associated with it?
  - Is the integrity of the public process maintained, including the right of Alaskans to participate in the decision-making process, appeal agency decisions, and pursue judicial recourse and citizen initiatives?
  - Will there be a full environmental impact statement under the National Environmental Policy Act?
  - Will the true financial costs and risks be made known to all Alaskans prior to decisions being made?
  - Is there government-to-government consultation with Alaska's tribal governments in accordance with the executive order on environmental justice?

ACA's support for an Alaska Natural Gas Pipeline project is based on the assumption that Alaska's gas will be used to meet U.S. energy needs and not serve the Alberta Tar Sands project in Canada. ACA does not support allowing Alaska natural gas to feed the Alberta Tar Sands project because it will exacerbate global warming and do nothing to keep natural gas prices down and encourages. ACA strongly encourages incentivizing the flow of gas to the lower 48 market. For more information on the dangers of tar sands development, see [www.nrdc.org/energy/dirtyfuels\\_tar.asp](http://www.nrdc.org/energy/dirtyfuels_tar.asp).

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<sup>3</sup> Best Value Contracting, for purposes of this document, is a competitive contracting process which requires projects to be awarded to the contractor offering the best combination of price and qualifications.

The Alaska Conservation Alliance and its member groups believe that any responsible development of North Slope natural gas resources must answer these key questions in the affirmative. ACA believes it is possible to design a natural gas pipeline within these constraints, and with them, supports the efforts to pursue natural gas pipelines.

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