



COPPER COUNTRY ALLIANCE

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a 501(c)(3) non-profit corporation
“Protecting the rural and wild natural environment of the
Wrangell Mountains/Copper Basin region.”

June 1, 2009

Commissioner Larry Hartig
AK Dept. of Environmental Conservation
410 Willoughby Ave. #303
Juneau, AK 99811

by e-mail to dec.commissioner@alaska.gov
and aracomments@nukaresearch.com

Re: Alaska Risk Assessment

Dear Commissioner Hartig:

Copper Country Alliance is an all-volunteer conservation organization serving the Copper River Basin and Wrangell Mountains region. Almost all of our members live in the region; all have stakes in keeping this region a healthy place to live, work, hunt, fish, and/or recreate. We feel that the Alaska Risk Assessment is failing us and all those who live along the entire pipeline corridor, because we are the ones who will suffer if there is a major oil spill from TAPS. To make it clear that we have both regional and general concerns, we are submitting this letter as a supplement to the multi-organization letter we have also signed.

TAPS has by no means a perfect record. Over the years, there have been many near-misses and occasional significant spills. Luckily, they haven't put oil into our rivers, but such an event is bound to happen when critical decisions about maintenance, inspection, and containment are in the hands of those whose first duty is to shareholders, not the Alaskan public, and when a risk assessment consists of a literature search instead of field inspections.

As we understand it, the State of Alaska appropriated \$5 million for a three-year risk assessment. Two years and over \$1.5 million have been spent just determining how that assessment will be done. We also understand that there have been no field inspections, and none are part of the proposed assessment.

Does the State of Alaska seriously propose to rely on documents from the oil industry instead of having a truly independent body doing field inspections? Has the State forgotten that it was British Petroleum's shoddy North Slope maintenance that prompted this risk assessment?

Over more than a decade, I have had conversations with TAPS workers in this region. They and their families live in this region; many are Ahtnas for whom Copper River salmon are important both for food and culture. They try to do their jobs well, but they see problems with the system and are genuinely concerned about the risks of an oil spill. The State of Alaska needs an Ombudsman with solid oil transportation experience to whom these workers could report their concerns without fearing for their jobs.

The Joint Pipeline Office should also be doing more field inspections. Most of the staff work from offices in Anchorage (which isn't even on the pipeline). Instead, there should be more field offices. One such office should be in the Copper Basin, where TAPS crosses five major salmon-bearing tributaries of the Copper River.

Copper Country Alliance and many other organizations have long asked for a TAPS Citizens Oversight Group, similar to the Prince William Sound Regional Citizens Advisory Council. PWSRCAC has been key to safe marine oil transport.

We urge that the State of Alaska abandon the current Alaska Risk Assessment. The money could be better spent on an Ombudsman and field inspections. We also request that the State vigorously promote the creation of a TAPS Citizens Oversight Group.

Sincerely,

COPPER COUNTRY ALLIANCE

Ruth McHenry, Volunteer Staff