

National Parks Conservation Association • Alaska Conservation Alliance
Denali Citizens Council • The Wilderness Society
Cook Inlet Keeper • Alaska Center for the Environment
Wrangell Mountain Center • Alaska Wildlife Alliance
c/o 750 West Second Ave. #205, Anchorage AK 99501

30 January 2009

M. Colleen Starring
President
ENSTAR Natural Gas Company
P.O. Box 190288
Anchorage AK 99519-0288.

Re: Denali National Park & Preserve Title XI process

Dear Ms. Starring,

Thank you and your staff for reaching out to the Alaska conservation community early on in your process to obtain permits to build a bullet gas pipeline from either the Foothills or Prudhoe Bay into the existing Southcentral gas pipeline system. In your presentation to us, your identified immediate concern was location of the right-of-way either through or around the Nenana Canyon and Denali National Park & Preserve. We appreciate the two briefings you have provided to the community on the options at Denali.

Based on the information you have provided to us at these two briefings, the apparent logical environmentally preferable choice for the gas pipeline through Denali National Park & Preserve is the six miles along the Parks Highway. This would seem to make the most sense from both an engineering and an environmental perspective as going around the park would necessitate construction in currently undeveloped lands. While the signers of this letter agree that bringing the gas pipeline along the Parks Highway through Denali seems to be the environmentally preferable alternative, we reserve final judgment until completion of the environmental review.

As mitigation for the pipeline through the park, we were pleased to hear you discuss the opportunity for a pathway constructed atop the pipeline ROW and a new pedestrian bridge across the Nenana River at McKinley Village. We feel this expansion of the existing front-country trail system would be a benefit to park visitors and would link the many visitors at McKinley village into the park entrance area by trail. We strongly encourage continuation of this part of the plan. In addition, we encourage you to work with the Park Service to see if they would benefit from a lateral line into the park to

support both the energy needs of the park headquarters complex and also possible use of natural gas for park buses.

Assuming the preferred gas pipeline right-of-way is along the Parks Highway, there will need to be a Title XI review for the six miles through Denali, which we anticipate will be included in your environmental review. Currently the National Park Service is not authorized to issue a right-of-way permit for gas pipelines anywhere in the country, which means final approval of the Title XI permit would need to go to the President and then to Congress. While our preference would be to complete the environmental review and, assuming the Parks Highway route is the best, follow the existing Title XI process, we understand that Enstar is developing legislation to give the National Park Service authority to issue a right-of-way permit for the six miles within Denali IF the environmental review shows it to be the environmentally preferable route.

This would not negate the need for a Title XI review, but it would allow the Park Service to make the decision without any additional review by the administration or Congress. We need to withhold any position on this proposed legislation until we see specific language. In keeping with your pattern of outreach early in the process, we would very much like to be a part of crafting this legislation to ensure that it is specific to this project only and it only provides authority to the Park Service to issue the right-of-way should the environmental review show it is the environmentally preferable alternative.

Furthermore, this letter should not be construed as anything more than an understanding of how to get through the six miles inside the boundaries of Denali National Park & Preserve. There are many unanswered questions about the routing and construction of the pipeline beyond these six miles that remain of interest and concern to many conservation groups in Alaska. We strongly urge you to expand your right-of-way and source of gas discussions with many of these same groups to cover the entire project.

Signed:

Jim Stratton
Alaska Regional Director
National Parks Conservation Association

Kate Troll
Executive Director
Alaska Conservation Alliance

Nancy Bale
President
Denali Citizens Council

Eleanor Huffines
Alaska Regional Director
The Wilderness Society

Toby Smith
Executive Director
Alaska Center for the Environment

Jeremy Pataky
Executive Director
Wrangell Mountains Center

Bob Shavelson
Executive Director
Cook Inlet Keeper

John Toppenberg
Director
Alaska Wildlife Alliance

cc:

Sue Masica, Alaska Regional Director, National Park Service
Paul Anderson, Superintendent Denali National Park