



January 2, 2012

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State of Alaska, Dept. of Natural Resources
Division of Mining, Land & Water,
Southcentral Region, Land Office
550 W. 7th Ave., Suite 900C
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Re: PUBLIC NOTICE LAS 28297 - John Lang dba The Alaska Wet Dog Race

Thank you for the opportunity to comment on this proposed event and for DNR's extending the comment period on this subject, allowing for more opportunity for the affected public to become aware of this proposed activity and be able to make meaningful comment on the proposed Alaska Wet Dog Race (AWDR).

The mission of the Prince William Soundkeeper is to protect water quality and the life it sustains in the Prince William Sound ecosystem. As a community based, nonprofit 501 (c) (3) organization, Prince William Soundkeeper works to monitor, protect, and enhance the waters of Prince William Sound through active stewardship, research, monitoring and fact-based education. The following are comments in general concerning the proposed race, and specifically as it pertains towards PWSK's mission.

General Comments:

Planning Details, Community Support & Safety

There are many impacts and issues to address when considering approval for this permit in general such as: safety issues over a large, remote areas that lack local US Coast Guard or medical presence, a lack of demonstrated support from listed communities to be visited by this race, and lack of a detailed plan for the event, i.e., number of support vessels listed, potential conflicts with other resource users, potential negative environmental impacts, etc. Spring weather in the Sound can be extremely unpredictable; with high winds, fog, rain, sleet and snow and treacherous seas, rendering flying support aircraft and making marine vessel travel extremely dangerous, if not impossible (especially for PWC!).

Economic and Shared Resource Impact

Commercial, recreational and subsistence fishing is one of the largest sources of income for the residents of the Sound. Late April, early May, is the start of the brief fishing season for the

commercial fishermen working the salmon openers, the charter fisherman taking tourists out to catch their first halibut, and the local subsistence fisherman gathering their fish resources for the winter. This time is crucial as fisherman of all stripes have limited opportunities to fill their quotas - or their larders - working between fishing openers and the weather. Any disruption, or difficulty, added to that task could mean economic disaster for that family or community. Tourism, another top economic industry in Alaska, is also starting its season in May. Visitors enter the Sound in all types of vessels from cruise ships to sailboats and kayaks; but they are all seeking the same thing, to enjoy the natural beauty, wildlife and the wilderness experience that the Sound offers. Kayaking and other such low impact recreational activities are very popular. These activities would be occurring at the same time and in the same areas as the AWDR, as shown by the map submitted by the applicant.

Specific Comments

Because Prince William Soundkeeper (PWSK) is primarily concerned with water quality and the wildlife resources of the Sound; the remainder of our comments here will be directed specifically toward that topic.

Impacts to Local Communities and Camping Areas

The focus and scope of the proposed event is quite large, and the applicant does not adequately address many difficulties and issues that this event would experience if permitted. For example, the small, remote communities of the Sound that this race proposes to visit have not been directly contacted to seek their input or support for the event. These communities are not going to be able to provide the infrastructure and physical support that will be necessary. The communities have little to no interest in any kind of “international” exposure, and the suggested economic benefit that is to be gained by hosting racers is unsupported, and extremely questionable.

PWS native communities such as Tatitlek and Chenega Bay have limited or no dock facilities; and no fuel, fuel waste, solid or hazardous waste facilities available to the public. There are no stores, hotels, maintained camping areas or other public conveniences. The influx of outsiders to these small remote communities in order to participate or witness this event would overwhelm the ability of those communities to handle it, resulting in direct negative impacts to the Sound’s water quality through non-point source waste sources such as loose bags of trash dumped or deposited on the docks, oily bilge water improperly disposed of, fuel spills and other such general harbor maintenance issues. Issues regarding where the racers will camp, etc. also have not been adequately addressed. Safe and sheltered landing areas are few and far between along Alaska’s coast. These areas are already receiving high impacts from the regular users of the Sound; additional people competing for, and utilizing these remote camping areas would add a huge burden of environmental impact that has not been addressed for mitigation in the AWDR proposal information submitted.

Incompatibility to Existing Resource Goals

Area Designations

Prince William Sound contains a U.S. Forest Service Wilderness Study Area. The proposed route passes right through this area. The activities of the Alaska Wet Dog Race are incompatible and are in direct conflict with the goals of the Wilderness Study Area.

Wildlife Impacts

The personal water craft (PWC) utilized in this event has many documented negative environmental impacts such as noise, air and water pollution. They are very disruptive to wildlife and to other resource and recreational users.

The 1989 *Exxon Valdez* oil spill (EVOS) did considerable damage to Prince William Sound. Over 20 years later, lingering oil can still be found in many areas of the Sound and it is still directly impacting wildlife. The EVOS Trustee Council has listed wildlife species within the Sound who have suffered from EVOS and list them as “recovering”, “not recovered”, or “recovered”. The species listed as “recovering” are: Barrow’s goldeneyes, black oystercatchers, killer whales, and sea otters. Pigeon gullimots and Pacific herring are listed as “not recovering”. Prince William Sound is home to many of Alaska’s State and Federal listed threatened and endangered species, or are “under consideration” for listing. A few of these species include: humpback whale, sei whale, Stellar’s sea lion, Kittlitz’s murrelet, and the yellow-billed loon. Many of these species utilize near shore areas for nesting, haul-outs and/or feeding.

The AWDR has scheduled the race for late April, early May. This is the prime time for spring migrant bird and mammal activity along Alaska’s coasts. This is also when the herring spawn happens which drives massive numbers of sea birds, sea lions, whales, bears, eagles, etc. to the intertidal and near shore areas throughout the Sound to feed on herring and herring spawn. These same near shore, relatively shallow, “protected” areas are also those same areas in which PWC would normally run. Prince William Sound, like most waters in Alaska, are extremely treacherous with cold, deep water, strong currents, steep cliff and rocky shorelines and unpredictable, severe weather during all seasons of the year. Operating PWC in those few areas which have calm, protected shore lines, will undoubtedly disturb wildlife that are also utilizing those areas.

Environmental Impacts

PWC operate at high rates of speed; usually cruising at 35-50 mph, but are capable of much faster speeds. With their shallow draft, jet skis run a real risk of collision with submerged rocks or wildlife such as humpback whales while operating at high rates of speed in shallow waters. PWC can be extremely loud. Sound over water, especially on calm days, will travel for quite a ways. PWC tend to operate in calm, shallow near shore waters. The proximity to areas utilized by wildlife combined with the noise pollution generated by these craft not only disrupts the enjoyment of other recreational Sound users, but disrupts and disturbs the wildlife as well.

Finally, PWSK is concerned about PWC and the direct impacts of their engines and the fuels used. Until recently, all personal watercraft ran on two-stroke engines. Two strokes are notoriously bad for the environment because they run on a mixture of gas and oil. Traditional PWC two-stroke engines are so inefficient they end up dumping up to 30 percent of their fuel into the water unburned. In a single hour of run time, a 2000-model PWC will dump about 4 gallons (15 liters) of unburned oil and gas into the water. Many of these older model 2-stroke PWC still exist – and could potentially be utilized for the AWDR. Many PWC now have cleaner four-stroke engines, and many older two-stroke models have been updated to have direct fuel injection, catalytic converters and other pollution-control measures. These cleaner PWC are allowed in many recreation areas that have banned the older, dirtier models. However, most national parks and many recreation areas still ban PWC because of pollution concerns from fuel additives such as methyl tertiary butyl ether, or MTBE (an oxygenate added to gasoline), and polycyclic aromatic hydrocarbons, or PAHs (by-products of the combustion process), and because of the previously mentioned problems with disruption of the natural experience for other resource users by PWCs.

In conclusion, Prince William Soundkeeper does not support the approval of a Land/Water Use application for the Alaska Wet Dog Race seeing that the application lacks complete information and documentation; and because of the overall negative impacts of such an activity for the resources and resource users of Prince William Sound would far outweigh any perceived benefits from having the event occur.

Sincerely,

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Resources:

<http://www.evostc.state.ak.us/recovery/status.cfm>
<http://www.adfg.alaska.gov/index.cfm?adfg=specialstatus.main>
<http://www.nps.gov/refdesk/hotdocs.htm>
http://www.nature.nps.gov/YearInReview/yir99/pages/05risks/03vanmouwerik_pwc.htm
<http://adventure.howstuffworks.com/outdoor-activities/water-sports/personal-watercraft4.htm>
<http://science.howstuffworks.com/environmental/green-science/watercraft-destroy-planet1.htm>
<http://www.inmotionmagazine.com/opin/jetskis.html>
<http://www.docstoc.com/docs/6824697/Personal-Watercraft-Safety>
<http://www.adfg.alaska.gov/index.cfm?adfg=ByAreaSouthcentralPrinceWilliamSound.main>

<http://www.sciencenews.org/view/generic/id/42311/title/>

Exxon_Valdez_Tidal_waters_still_troubled

<http://www.evostc.state.ak.us/Projects/SearchResults.cfm?method=current>