

2/14/11

OVERVIEW:

DEPARTMENT

OF LAW



Department of Law

Photo by Sheena Scott, Department of Law Webmaster ©



Civil Division Overview
for the Joint Senate-House Judiciary
Committees of the 27th Alaska Legislature
Attorney General Designee John J. Burns

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MISSION

The mission of the Alaska Department of Law is to prosecute crime and provide legal services to state government for the protection and benefit of Alaska's citizens.

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- ## Core Services
- I. Protecting the Safety and Financial Well Being of Alaskans
 - II. Fostering Conditions for Responsible Development of Our Natural Resources
 - III. Protecting the Fiscal Integrity of the State
 - IV. Promoting Good Governance
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Key Statistics

| Attorneys | FY12 | FY11 | Change |
|-------------------------|------------|------------|----------|
| Civil | 163 | 162 | 1* |
| Criminal | 122 | 121 | 1** |
| Administrative Services | 1 | 1 | 0 |
| Total | 286 | 284 | 2 |

| Support Staff | FY12 | FY11 | Change |
|-------------------------|------------|------------|----------|
| Civil | 140 | 139 | 1 |
| Criminal | 118 | 118 | 0 |
| Administrative Services | 21 | 21 | 0 |
| Total | 279 | 278 | 1 |

Department offices: *Anchorage, Barrow, Bethel, Dillingham, Fairbanks, Juneau, Kenai, Ketchikan, Kodiak, **Kotzebue, Nome, Palmer, and Sitka

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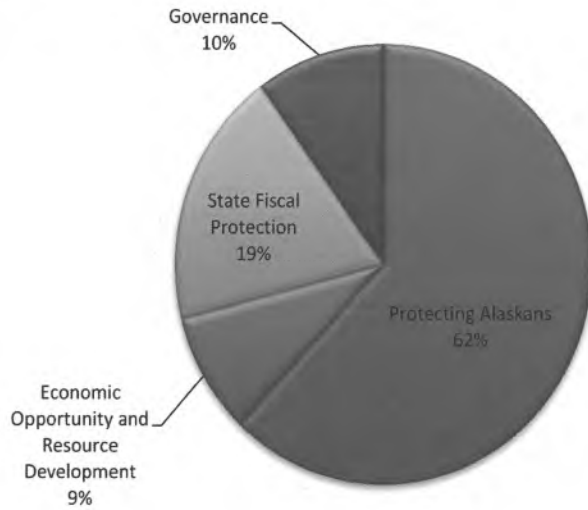
FY 12 Budget Request by Core Service

(In Millions)

| Priority Programs | UGF Funds | DGF Funds | Other Funds | Federal Funds | Total Funds | Percentage of Total Funds |
|---|-------------|------------|-------------|---------------|-------------|---------------------------|
| Protecting Alaskans | 39.1 | 2.0 | 10.6 | 1.5 | 53.2 | 62.0% |
| Economic Opportunity and Resource Development | 4.2 | -0- | 3.2 | .1 | 7.5 | 8.7% |
| State Fiscal Protection | 8.1 | .7 | 7.6 | -0- | 16.4 | 19.2% |
| Governance | 4.4 | -0- | 4.2 | -0- | 8.6 | 10.1% |
| Department Totals | 55.8 | 2.7 | 25.6 | 1.6 | 85.7 | 100% |

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Core Services



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FY 10 Return on Investment

(Millions)

| | Awards & Collections | Costs (FY 10 Authorized) | Benefit to Cost Ratio |
|-------------------------------------|----------------------|-----------------------------|-----------------------|
| Return on Total Department Budget | \$576.0 | \$85.4 | 6.75 |
| Return on the Civil Division Budget | \$576.0 | \$48.9 | 11.77 |

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Criminal Division

- Carries out core function of Protecting Alaskans
 - **13 District Attorney's Offices** - Ketchikan to Kodiak to Kenai to Kotzebue, Barrow to Bethel, Anchorage, Dillingham, Palmer, Fairbanks, Nome and Sitka
 - **Office of Special Prosecutions** – Cold cases; Medicaid, welfare, PFD and insurance and workers' compensation fraud; cybercrimes; fish and game crimes; environmental crimes; alcohol interdiction; criminal non-payment of child support; violations of state tax law
 - **Appeals**
 - **Rural Prosecution Unit** – assists rural offices when work load demands outstrip available prosecutor resources

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I. Protecting Alaskans Criminal Division

- *State v. Lepping*
 - Fish and Game prosecutor Andrew Peterson tried and convicted Wasilla guide Keith Lepping on 23 counts of fishing and hunting violations including bear baiting
 - Lepping jailed for almost a year, forfeited a C-206 and Super Cub, fined \$85,500, lost his guide and transporter licenses
- *State v. Torian*
 - Cold case prosecutor Paul Miovas charged former Anchorage resident with murder in 2000 stabbing death of Genevieve Tetpon
 - One of a series of alleged murders involving Alaska Native women in 1999 and 2000

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Prosecutors in Statewide Offices



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How the Civil Division
Supports the Department
of Law's Four Core
Missions

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Assistant AG's in Statewide Offices



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I. Protecting Alaskans Civil Division



- Child Protection (23 attorneys)
- Commercial and Fair Business (18 attorneys)
- Human Services (9 attorneys)
- Regulatory Affairs and Public Advocacy (3 attorneys)
- Environmental (10 attorneys)
- Labor and State Affairs (19 attorneys)

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I. Protecting Alaskans
Child Protection Section

- Child Protection attorneys represent the Office of Children’s Services when the welfare of a child is at risk
 - 3,000 Child in Need of Aid cases yearly
 - 2,000 cases ongoing at any time
 - Child protection attorney case load is 113 per attorney—exceeding the recommended national average of 100 cases

I. Protecting Alaskans
Child Protection Section

- Prevailed in **all eleven recent Alaska Supreme Court appeals** of superior court orders terminating parental rights, thereby freeing children for adoption by safe families



I. Protecting Alaskans Commercial and Fair Business Section

- Consumer Protection Unit suits or settlements
 - Publishers Clearing House, DIRECTV, Dannon Yogurt, “Average Wholesale Price” Drug litigation
 - Local auto dealer making illegal advertisements about “guaranteed trade in allowances”
 - Juneau jewelers falsely advertising “40-75% off” sales



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I. Protecting Alaskans Commercial and Fair Business Section

- 2010 Department of Law Fuel Price study
 - Why are rural fuel costs so high?
 - Small volumes
 - Remote locations
 - Difficult weather
 - No evidence of price-fixing
 - ISER concurred in separate Western Alaska report



Rural Alaska fuel storage tanks

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I. Protecting Alaskans

Human Services Section, Labor and State Affairs Section
Commercial and Fair Business Section

- *Patient Protection and Affordable Care Act (PPACA)*
 - Litigating constitutionality with 25 other states
- Ongoing advice to DHSS and Divisions of Insurance and Retirement and Benefits on how PPACA—if constitutional -- will affect Alaska
 - AlaskaCare, the state health care plan
 - Insurance exchange
 - Medicaid expansion



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I. Protecting Alaskans

Human Services Section

- Defending State DHSS in lawsuits for program payments
 - Medicaid
 - Foster care
 - Public assistance
- Representing DHSS in facilities licensing investigations and enforcement actions
 - Hospitals
 - Nursing homes
 - Assisted living facilities
 - Child Care centers
 - Foster homes
- Representing DHSS in Medicaid overpayments
 - Independent auditor said provider service charges excessive
 - Potential recoupment \$1.9 million+

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**I. Protecting Alaskans
Environmental Section**

■ ***State v. BP Exploration
Alaska (BPXA)***

- Suit to recover civil assessments and revenue losses from the 2006 Prudhoe Bay pipeline shutdown due to corrosion



Leak and spill



Sludge buildup prevented corrosion detection equipment from working

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**I. Protecting Alaskans
Environmental Section**

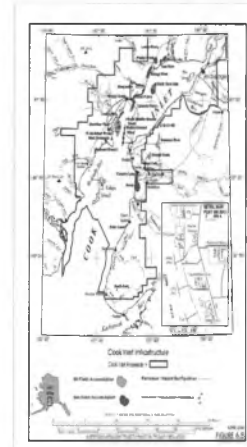
- ***Cruise Ship Initiative***
- **HB 134 regulating wastewater discharges allows cruise ship owners and operators until 2016 to fully comply with new water quality standards**
 - State defending lawsuit challenging DEC's new permit



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I. Protecting Alaskans
Regulatory Affairs and Public Advocacy Section

- RAPA advocates public interests in regulated utility matters before the Regulatory Commission of Alaska (RCA)
 - *Cook Inlet Natural Gas Storage Alaska (CINGSA)*
 - RCA's decision approving underground gas storage facility issued January 31, 2011



I. Protecting Alaskans
Regulatory Affairs and Public Advocacy Section

- *Enstar* Billing Error Refunds
 - RCA ordered Enstar to pay \$5.7 in refunds
 - RAPA monitoring to assure refunds paid to eligible customers



I. Protecting Alaskans Civil and Criminal Division

- Played a key role in developing the 10-year Sexual Assault/Domestic Violence Initiative
- Collaborating with agencies and non-profits to support the Initiative
- Coordinated PSA's for the "Choose Respect" campaign
- Sponsored pro-bono summits



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II. Fostering Responsible Development

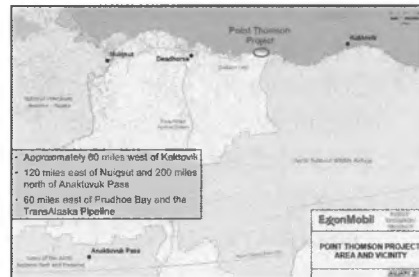


- Oil Gas and Mining (14 attorneys)
- Transportation and Public Facilities (8 attorneys)
- Environmental (10 attorneys)
- Natural Resources (13 attorneys)

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II. Fostering Responsible Development Oil Gas and Mining Section

- *Point Thomson litigation*
 - Continuing to pursue resolution with ExxonMobil



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II. Fostering Responsible Development Transportation and Public Facilities Section

- Advising DOTPF and defending state on building projects
 - Goose Creek Prison
 - Alaska Marine Highway System HQ and Ketchikan dry dock expansion
 - Juneau Access Road
 - Knik Arm Crossing
 - In-state gas pipeline and propane projects

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II. Fostering Responsible Development Environmental Section

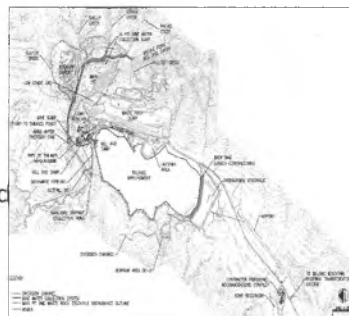
- Joined Couer Alaska and defended Army Corps of Engineers Clean Water Act permit authorizing disposal of mine tailings
- Prevailed in the United States Supreme Court, allowing **Kensington Mine** to open
- **Mine opening created and preserved hundreds of jobs**



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II. Fostering Responsible Development Environmental Section

- Red Dog Mine
 - EPA withdrew key components of water pollution discharge permit
 - Assisted DEC in promulgating new regulations
 - Incorporated into a revised Clean Water Act permit
 - Mine operations continued
 - Jobs preserved

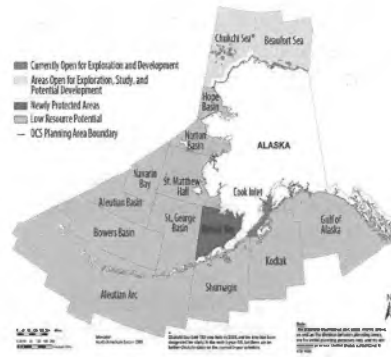


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II. Fostering Responsible Development Oil Gas and Mining Section

■ Defended Outer Continental Shelf (OCS) leases in court challenges

- Opposed a challenge to Interior's grant of Lease 193 to lessees
 - Court clarified that injunction on Lease Sale 193 pending further Interior review did not enjoin seismic testing
- Defended Interior's approval of Shell's Beaufort and Chukchi Sea OCS exploration plans in lawsuits in federal courts
- Filed an amicus brief in support of Interior's approval of OCS 5-year plan



April 6, 2010 Department of Interior
Outer Continental Shelf Strategy

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II. Fostering Responsible Development Oil Gas and Mining Section

■ Challenged Interior's purported imposition of a "moratorium" on development in Alaska OCS

- In *Alaska v. Salazar*, based on Interior's unequivocal denial of a "moratorium," clarity achieved



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II. Fostering Responsible Development Natural Resources Section

■ Tongass Timber

- State partners with U.S. Forest Service in management of Tongass National Forest
 - State intervenes to defend timber sales where appropriate
 - Supported "Tongass Exemption" to USFS "Roadless Rule"
 - Supported Forest Service authorization of Logjam sale



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II. Fostering Responsible Development Natural Resources Section

- **Endangered Species Act
Developing Comprehensive
Strategy**
 - Challenging unwarranted listings
 - Challenging unwarranted critical habitat designations
- Listings and designations can affect shipping, transportation, oil and gas development, mining, commercial, sport and subsistence fishing and hunting



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II. Fostering Responsible Development Natural Resources Section

□ Endangered Species Act

□ Listing petitions

- Polar bears
- Beluga whales in Cook Inlet
- Steller sea lions
- Humpback whales
- Pacific walrus
- Seals (ringed and bearded)
- SE Alaska Pacific herring



□ Critical Habitat Designations

- Polar bear
- Cook Inlet Beluga whale

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II. Fostering Responsible Development Natural Resources Section

□ Endangered Species Act

□ Pending Lawsuits and appeals

- Polar bear
- Beluga whales
- Steller sea lions
- Humpback whales
- Ribbon seal



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II. Fostering Responsible Development Natural Resources Section

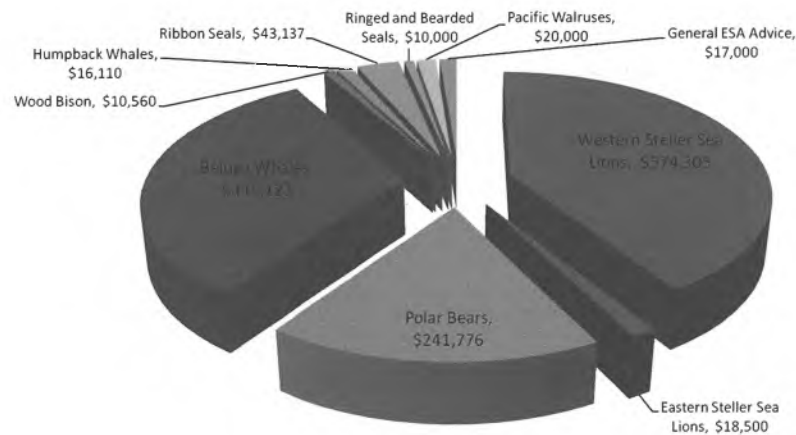
Endangered Species Act

- Threatened lawsuits
 - State's notice of intent to sue to challenge 187,000 square miles of critical habitat designation for polar bear



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ESA FY11 Budget Expenditures (\$1,396,875)



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II. Fostering Responsible Development Oil Gas and Mining Section

- Assisting DNR and DEC in requesting prompt federal review of challenges to petroleum exploration in the **National Petroleum Reserve-Alaska (NPR-A)**
 - Clean Water Act wetlands fill permit for CD-5 project



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II. Fostering Responsible Development Natural Resources Section

- Advising DNR on response to BLM Wilderness and "Wild Lands" designations
 - Interior Secretary Salazar ordered the evaluation of **72 million+ acres of federal land in Alaska for wilderness characteristics, potentially** allowing federal government to create de-facto wilderness in Alaska without congressional oversight
 - Affects permitting and right of way determinations
 - Changes the multiple use mandate otherwise applicable to BLM lands
- U.S. Fish and Wildlife Service revisions to the Arctic National Wildlife Refuge (ANWR) Comprehensive Conservation Plan, evaluating wilderness
 - Dept. of Law provided legal advice to Governor who wrote President Obama urging him to respect ANILCA



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II. Fostering Responsible Development Environmental Section

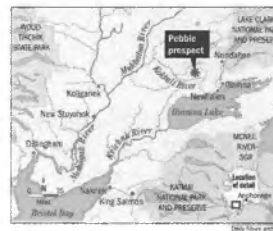
- Assisting DEC's request for prompt EPA action on Shell's Clean Air Act permit application after Environmental Appeals Board (EAB) remanded application for further work
 - EAB questioned EPA's analysis of impacts of nitrogen dioxide emissions from drill ships
 - Shell now postponing plans to drill exploratory wells this summer



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II. Fostering Responsible Development Environmental and Natural Resources Sections

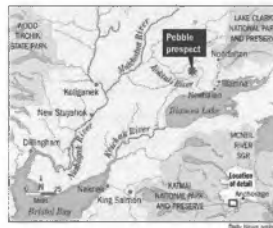
- Clean Water Act 404(c)
 - EPA by MOA with Corps of Engineers may invoke 404(c) to veto some Corps permit decisions
 - EPA usually exercises veto authority sparingly (only 13 times since 1972)
 - Southwest Alaskans asking EPA to invoke 404(c) process before companies at Pebble prospect apply for development permits on state mining claims
 - Assisting DEC and DNR in evaluating response to EPA's agreement to review



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II. Fostering Responsible Development Environmental Section

- *Nunamta Aulukestai v. State*: Defending the State in a suit alleging constitutional violations in statutes and regulations that authorize temporary land and water use permits for mineral exploration at the Pebble project



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II. Fostering Responsible Development Natural Resources Section

- Defending Alaska's Fisheries Management
 - *In Upper Cook Inlet Drift Association v. Locke*, state intervened (with U.S.) in lawsuit where UCIDA wanted to preempt state management of salmon fisheries in Cook Inlet (state waters)
 - UCIDA and U.S. settlement requires UCIDA to submit allocation proposals to state Board of Fisheries
- ADF&G request exclusive management



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III. Protecting Fiscal Integrity



- Collections and Support (8 attorneys)
- Oil Gas and Mining (14 attorneys)
- Labor and State Affairs (19 attorneys)
- Torts and Workers' Compensation
(15 attorneys)

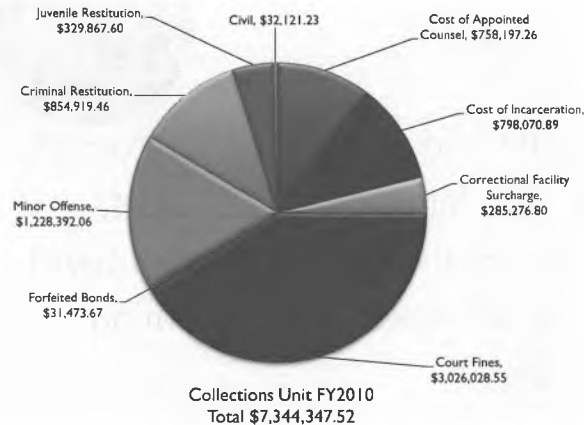
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III. Protecting Fiscal Integrity Collections and Support Section

- Collects criminal fines and surcharges owed the State and restitution owed to 3rd parties
 - Collected \$7.3 million in FY 10, of which \$1.1 million was for victim restitution

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Collections and Support Recoveries FY 10



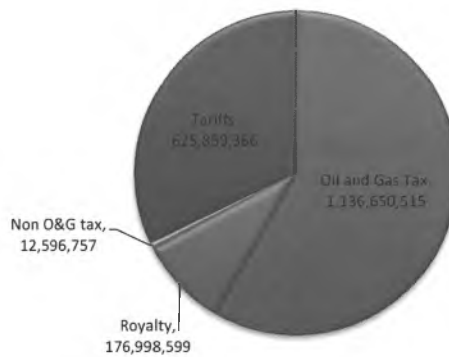
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III. Protecting Fiscal Integrity Oil Gas & Mining Section

- ❑ Oil and Gas Royalties and Taxes - Summary
 - State operating revenues come from oil and gas corporate income taxes, production taxes, property taxes and royalties on Alaska North Slope crude oil
- ❑ Collected nearly \$82 million in additional taxes and royalties in *calendar* year 2010
- ❑ Collected \$95.9 million in FY 11 through February 8, 2011

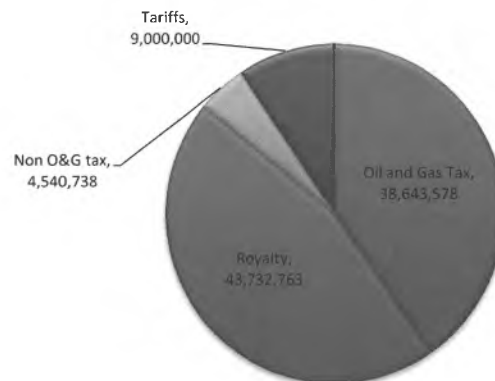
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**Oil, Gas and Mining
Decisions and Settlements
FY00-FY10 (\$1.95 billion)**



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**Oil, Gas and Mining
Decisions and Settlements
FY11 Though February 8, 2011
(\$95.9 million)**



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III. Protecting Fiscal Integrity Oil Gas and Mining Section

■ TAPS Tariff Litigation

- State protested TAPS tariff rates for 2005 and following years before the Federal Energy Regulatory Commission (FERC) and Regulatory Commission of Alaska (RCA)

 - TAPS Strategic Reconfiguration case concurrently before FERC and the RCA
 - State challenge to TAPS' Owners inclusion of hundreds of millions of dollars in imprudently incurred capital project expenditures in the tariffs.
 - Eight-week hearing before the FERC and RCA scheduled for November 2011
-

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III. Protecting Fiscal Integrity Oil Gas and Mining Section

■ TAPS Property Tax Litigation

- Represented Dept of Revenue in Superior court trial on 2006 TAPS property tax valuation
 - Court said State Assessment Review Board (SARB) methodology correct
 - Outcome increased property tax revenues for affected municipalities and state
 - TAPS Owners appealed
 - assessment too high
 - Municipalities also appealed
 - assessment too low
-

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**III. Protecting Fiscal Integrity
Oil Gas and Mining Section**

- **More TAPS Property Tax litigation**
 - Representing Dept of Revenue in Superior Court appeals from SARB's 2007-2009 TAPS property tax assessments
 - Eight-week trial in September 2011

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**III. Protecting Fiscal Integrity
Commercial and Fair Business and Labor and State
Affairs Sections**

- **Cruise Ship Initiative Passenger Tax**
 - Cruise ship initiative made income from cruise ship water activities subject to Alaska Net Income Tax and imposed a gambling tax and a "head" tax of \$46
 - Cruise industry sued state over the "head tax"
 - Defended Dept of Revenue and assisted in negotiating a settlement
 - Legislature passed new law reducing the tax rate to \$34.50
 - Preserves payment of about \$34 million per year to defray costs of services and facilities to accommodate passenger visits

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III. Protecting Fiscal Integrity Labor and State Affairs Section

- State lawsuit against Mercer, actuary for state pension plans (PERS) and (TERS)
 - Lawsuit settled
 - Mercer paid \$500 million

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III. Protecting Fiscal Integrity Natural Resources Section

- *Carlson v. State*
 - 26 year old lawsuit by non-resident fishermen
 - They sought refunds of commercial fishing permit fees
 - Nonresident fees used to be 3x higher than resident fees
 - Court ruled against state
 - Judgment is \$12 million in principal
 - \$82.3 million total
 - Much of it due to 11% prejudgment interest compounded quarterly
 - plus attorney's fees
 - Case on appeal to Supreme Court
 - Successful outcome could be worth \$60 million in savings

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III. Protecting Fiscal Integrity Transportation Section

- State suing the boat builder and the manufacturer of the state's two fast ferries (*M/V Fairweather* and *M/V Chenega*) for engine defects
- Engine defects have cost the state hundreds of thousands of dollars in repairs
- *M/V Fairweather* still out of service

Greenberg: "consequential damages"



Figure 1. Fairweather Engine MEH. 3-D view of piston, head, valves and wall degradation.

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III. Protecting Fiscal Integrity Tort and Workers' Compensation Defense Section

- In 2010, Department successfully defended over 200 tort claims with **no adverse judgments** against the state

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IV. Promoting Good Governance

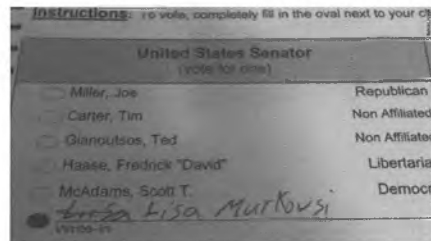
- Natural Resources (13 attorneys)
- Opinions, Appeals and Ethics (11 attorneys)
- Labor and State Affairs (19 attorneys)



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IV. Promoting Good Governance Labor and State Affairs Section

- Defended Federal Elections (November 2010) lawsuits
 - Write-in candidate's name lawsuit
 - Miller public records lawsuit
 - Miller federal lawsuit (part 1)
 - Miller state lawsuit
 - Miller federal lawsuit (part 2)
 - Other lawsuits
 - Voting Rights Act lawsuit
 - Fairbanks suit filed 1/10/11 (state moved to dismiss as untimely)
 - Law advised and defended Division of Elections



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IV. Promoting Good Governance Labor and State Affairs Section

- **Nick v. State**
 - Defended and settled elections lawsuit in Western Alaska
 - Enhancements to language assistance for Yup'ik speaking voters will be available at elections in Bethel area



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IV. Promoting Good Governance Opinions, Appeals and Ethics, Labor and State Affairs Sections

- Defending the Initiative Process
 - *Planned Parenthood v. Campbell*
 - State defended lawsuit to overturn certification of ballot initiative to require parental notification of minor daughter's abortion
 - Alaska Supreme Court ruled initiative should appear on the ballot
 - Alaska voters enacted parental notification law by initiative in 2010
 - Constitutionality of that law now being challenged in *Planned Parenthood v. State*
 - *Natural Right to Life (10NRTL)*
 - Department opined initiative should not be certified because proposal "clearly unconstitutional" under federal and state law

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IV. Promoting Good Governance Opinions, Appeals and Ethics Section

- *Executive Branch Ethics Act* advice and enforcement
 - Adopted new regulations, including standards governing state reimbursement of attorneys fees incurred by state officers exonerated in an ethics complaint proceeding
 - Similar to Rep. Gruenberg's HB 14 authorizing state reimbursement only after exoneration
 - Ethics training for senior managers and boards
 - Advisory opinions and investigations
-

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IV. Promoting Good Governance Opinions, Appeals and Ethics Section

- **Public Records Requests**
 - 26,500 pages of former Governor Palin's emails
 - Legal review to be completed by 3/31/11
 - Governor's Office review to be completed by 5/31/11
 - In 2010, Department of Law
 - Addressed 43 separate voluminous public records requests directed to Law
 - Provided privilege reviews for records requests to other state agencies
-

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CHALLENGES AND OPPORTUNITIES

WHAT'S AHEAD FY 12 AND BEYOND



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- ❑ **Continue to Advance Core Services**
- ❑ **State-Federal Relations**
 - Areas where state and federal cooperation is working well
 - Areas where a core state interest requires federal challenge



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General Examples where State-Federal Cooperation is Working Well

- Department of Environmental Conservation's (DEC) air permitting program
- DEC assumption of National Pollutant Discharge Elimination System (NPDES) permit program under the federal Clean Water Act
- Cleanups at federal facilities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and other federal and state laws

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Specific Examples of State Cooperation with Federal Programs

- Defended Army Corps of Engineers Clean Water Act permit authorizing disposal of mine tailings, allowing Kensington Mine to open
- Worked with EPA to incorporate revised DEC regulations into Red Dog Mine Clean Water Act permit
- Intervened on side of U.S. in *Point Hope v. Salazar* and *Center for Biological Diversity v. U.S.*
 - Outer Continental Shelf cases
 - challenging the OCS 5-year plan
 - challenging to OCS Lease Sale 193 (Chukchi Sea)
 - Challenging Shell's Beaufort and Chukchi Sea OCS exploration plans
- Supported U.S. Forest Service authorization of Logjam timber sale

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Areas Where a Core State Interest Requires Challenge Because of Federal Overreach

- **Endangered Species Act**
 - U.S. Fish and Wildlife Service
 - Species listings
 - Critical habitat designations
- **Clean Water Act**
 - Environmental Protection Agency
 - Wetlands fill permit 404(c) elevated scrutiny
 - CD-5
 - Tanana River Bridge
 - Pre-permit scrutiny
 - Pebble prospect
- **Clean Air Act**
 - Environmental Protection Agency
 - Offshore oil and gas exploration
 - Shell Beaufort Sea drilling plans
- **Wilderness and "Wild Lands" designations**
 - Bureau of Land Management
 - Designations could tighten permit requirements
- **Patient Protection and Affordable Care Act**
 - Constitutionality

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Challenges and Opportunities

- **Support--as legally appropriate--responsible resource development**
 - **Develop a comprehensive long term development strategy**
 - **Endangered Species Act**
 - Unwarranted listings
 - Unwarranted designations of critical habitat
 - **Outer Continental Shelf exploration**
 - Challenges when warranted
 - **Clean Air and Water Acts**
 - Challenges when warranted

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Challenges and Opportunities

- Develop a 5-year **interdepartmental** plan
 - Coordinate and cooperate
 - Legislative and executive branches of state government
 - All executive agencies
 - Department of Natural Resources
 - Department of Environmental Conservation
 - Department of Commerce Community and Economic Development
 - Department of Law
 - Department of Fish and Game
-

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Challenges and Opportunities

- Cooperate and coordinate with stakeholders **outside and inside** state government
 - Municipalities
 - Boroughs
 - Native corporations and tribes
 - Other states
 - Washington and Oregon joined to de-list the Stellar sea lions
 - Allies like National Association of Attorneys General and Association of Fish and Wildlife Agencies
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- Thank you

Attorney General Designee
John J. Burns



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