

## **APPENDIX E**

### **Comment Summary Report**

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## **ACC Access to Land/Property**

*Comments that discuss property/land access.*

- ACC 1 Comment expressing concern that an access road proposed just south of their property will create unwanted access for people to start using.
- ACC 2 Land on the west side of Willow, much of which is private property, is not a road as it appears in Google/Garmin Maps but actually an old trail with a considerable amount of clay beneath the moss. The access road also crosses an active runway listed in the FAA database prior to the "road" (AK08).
- ACC 3 Comments related to concerns about access to land owner property. AGDC requested permission to access the land for preliminary studies including clearing a 15-foot trail for drill rig access to bore hole sites. Permission was not granted. The landowner requests that access be limited to 5 specific acres of their parcel and limited to foot traffic and non-mechanized hand tools only. The landowner also restricts access on or around the ponds and beaver dams on their property.
- ACC 4 A comment was received stating that AGDC constructed a trail from the Parks Highway to 200 feet from landowner's house. The landowner had previously asked for no trails to be built.
- ACC 5 Making a new right-of-way corridor will provide additional access for people to wildlands. This will increase potential for wildfires by people hunting, trapping, driving ATVs, and partying along the corridor.
- ACC 6 After the pipeline is built, what is the status of the right-of-way as far as a public right-of-way?
- ACC 7 The proposed route will cut into one corner of my property. Will I be able to farm over the top of the line? Will there be an easement or is it going to be fee simple?
- ACC 8 Construction camps may limit access to public and private lands.
- ACC 9 Can snowmachiners and four-wheelers use the pipeline corridors?
- ACC 10 Can you comment on using this right-of-way and the upkeep of it after it's built and keeping it up and maybe using it as a fire break for the State and the local area? I would like all projects to be built with as many uses as they can.
- ACC 11 Will section line easements be honored for every mile and allow crossings?

## ACC Access to Land/Property

*Comments that discuss property/land access.*

- ACC 12 How much impacts land is federal and how much is state and local government? Has the proponent been working to acquire any land at this point?
- ACC 13 A natural gas pipeline does not qualify as a legal use within a Federal Aid Highway right-of-way. During the course of the ASAP DEIS planning process no involvement was requested from either NYC or Ahtna pertaining to allowable right-of-way uses, vacations, or monetary determinations for property. Of the 4,063 acres impacted by the project, approximately 264 acres will be directly impacted with the proposed easement on Ahtna conveyed or selected ANCSA lands and an additional 137 acres of private, ANCSA land ownership. A right-of way, A-052629 (Parks Highway), for a Federal Aid Highway. Act of August 27, 1958, as amended, 23 U.S. C. 317, located in Sees. 1, 11, 15, 21, 22 and 28, T. 19 S., R 9 W., Fairbanks Meridian, Alaska.
- ACC 14\* In the letter from Project Manager Mary Romero dated November 14, 2012 Ahtna's concern over the appropriate and allowable use of the Parks Highway Right of Way (ROW) was dismissed. Ahtna would like to go on record stating that the plan of placing the pipeline corridor on the highway and power line ROWs is not within the allowed uses of the reserved right of way. Further, the ROWs are surface reservations, and the placement of the pipeline will be a subsurface activity. Ahtna is the owner of the subsurface of Village lands. As the private land owner, Ahtna feels it should have been consulted over the use of these routes.
- ACC 15\* Ahtna continues to support our customary and traditional use position as it was documented in Ahtna's memorandum dated February 28,2012, in the Draft Alaska Stand Alone Gas Pipeline EIS.
- ACC 16\* The ASAP DEIS identifies 4,063 total acres the pipeline easement will impact. Of the 4,063 acres approximately 33-miles or 264 acres will be directly impacted with the proposed easement on Ahtna conveyed or selected ANCSA lands and an additional 137 acres of private, ANCSA land ownership. The reserved right-of-way for existing highways is clearly defined and identified within the United States Patents. Through expert attorney-client consultation a natural gas pipeline does not qualify as a legal use within a Federal Aid Highway right-of-way. During the course of the ASAP DEIS planning process no involvement was requested from either NVC or Ahtna pertaining to allowable right-of-way uses, vacations, or monetary determinations for property.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

**ACK**

**Acknowledged**

*Acknowledges the receipt of the communication that may be related to another topic other than the proposed ASAP project.*

- ACK 1      Comments regarding transfer of project information to stakeholders.
- ACK 2      Communications unrelated to project
- ACK 3      Out of scope comments on regarding an ADOT&PF project (Foothills West Transportation Access).
- ACK 4      Comments opposed to the project.
- ACK 5      Commenter provided the name of an interested individual to add to the mailing list.
- ACK 6      Comments expressing opposition to a port in Nome.
- ACK 7      Consider a road to connect Nuiqsut to the Dalton Highway if this project goes forward.
- ACK 8      Consider providing any leftover lumber that may be used to transport GCF modules to the local communities where lumber is scarce.

**AIR      Air Quality or Emissions/ Climate Change/ Green House Gases**

*Comments related to air quality, air emissions, climate change, or green house gas (GHG) emissions.*

- AIR 1      Identify the physical, climatological, meteorological, and visibility characteristics of the project area, which are important to understanding air pollution and transport. Include the representative climate data in the vicinity of the project, including mixing height information, a discussion on whether the data is representative enough to characterize movement of the air mass in the area of interest, and a discussion of variables that affect air pollution and the fate and transport of pollutants, including air dispersion patterns, complex terrain interactions, extreme temperature affects, seasonal variations, and presence of other atmospheric phenomena
  
- AIR 2      Discuss surrounding topography, pollutant transport and dispersion, and potential secondaryformation of air pollutants
  
- AIR 3      Provide existing baseline air quality data, including on a map the locations and terrain elevation of all past and present air quality and meteorological data collections stations, methods and frequency of monitoring, criteria air pollutants (e.g. SO<sub>2</sub>, NO<sub>2</sub>, CO, O<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>. and Pb), measured maximum, minimum, and average concentrations, data quality assurance and quality control
  
- AIR 4      Describe the natural resources, ecosystems and human communities that may be adversely affected by any additional air emissions, including critical habitat areas or sensitive areas, wildlife refuges or sanctuaries, sensitive wetlands and water bodies, threatened and/or endangered species or species of special concern, water resources, or archeological or cultural resources
  
- AIR 5      Discuss project area air quality designations (i.e., attainment, non-attainment or unclassified), if any and the need to conduct conformity analysis
  
- AIR 6      Discuss and provide a map showing the project definition of ambient air
  
- AIR 7      Summarize and discuss the representativeness of the measured air quality data used for background levels

## **AIR      Air Quality or Emissions/ Climate Change/ Green House Gases**

*Comments related to air quality, air emissions, climate change, or green house gas (GHG) emissions.*

- AIR 8      Develop an air emissions inventory to provide a comprehensive accounting of the sources and the total quantities of air pollutant emissions from all aspects of the proposed project and alternatives. Emission sources considered should include support activities, such as site preparation, project construction and start-up, as well as operations, and maintenance activities. An emissions inventory should cover all potential pollutant releases and cover a specific geographic area for a certain timeframe. Include scaled schematics and process flow diagrams that identify product flow and emission-generating activities and points. Fugitive emission points, emission leaks, gas flaring, and ancillary activities that have the potential to generate air emissions should also be included
- AIR 9      Provide emission inventories of all project combustion and non-combustion, mobile and stationary sources. This would include sources of emissions during the construction and operation phases, and the total quantity of air pollutants emitted (e.g., GCF, diesel engines, turbines, mobile sources, aircraft, marine tugs/barges, pipeline, and fugitive road dust)
- AIR 10     Identify sources of potential gas flaring and describe the gas flaring system for the proposed pipeline and GCF. Evaluate the air emissions associated with the source of gas flaring
- AIR 11     Identify any nearby sensitive receptors (i.e., schools, hospitals, churches, etc.) and vulnerable populations (i.e., children, elderly, asthmatics, pregnant women, etc.); Consider various pathways of exposure, such as direct contact, inhalation of particles or gaseous pollutants and potential impacts to receptors as a result of pathway exposure
- AIR 12     Identify and discuss applicable air quality laws, regulations, standards, and guidance. Verify the data meets the National Ambient Air Quality Standards (NAAQS) and/or State standards, increments and thresholds. Provide date(s) for any monitoring data that indicates an air quality violation. Identify and discuss required air quality permits.
- AIR 13     Include a plot plan/facility layout showing the ambient air boundary, location of all emission sources, buildings, structures, north arrow and scale.
- AIR 14     Provide tables summarizing the data and model results, and graphics/isopleths to display the locations of predicted concentration. This applies to both a project only analysis and a cumulative analysis. There should be reference sections for sources of assumptions, information and data.

**AIR            Air Quality or Emissions/ Climate Change/ Green House Gases**

*Comments related to air quality, air emissions, climate change, or green house gas (GHG) emissions.*

- AIR 15            Hazardous Air Pollutants (HAPs) - Include a list of project specific HAPS emitted, estimated quantity, and the mobile (e.g., trucks, vehicles, heavy equipment, tugs/barges and marine vessels, airplanes) and stationary (e.g., the GCF, diesel powered generators) sources
- AIR 16            Compare the emissions to the National Emissions Standards for Hazardous Air Pollutants (NESHAP). Discuss whether the HAP standards would be achieved or explain why the standards would be exceeded
- AIR 17            Identify mitigation measures, and control technologies that would be implemented to minimize the emission of HAPs. Mitigation measures could include the use of natural gas to power heavy equipment and vehicles during project construction and operations
- AIR 18            Any pollutants not considered in the analysis, there should be a discussion for their omission and an explanation why omitted pollutants are not expected to contribute to reasonable significant impacts
- AIR 19            In the emissions inventory, include estimates of PM2.5 and PM10 (particulate matter) emissions from project sources during construction, operation, and maintenance, such as the gravel roads and pads, gravel source sites, etc
- AIR 20            Evaluate the magnitude and significance of fugitive dust emissions (e.g., gravel roads and pads, construction activities, etc.) and impacts on human health and sensitive populations (e.g., children and elderly)
- AIR 21            Identify mitigation measures, such as wetting the source material, installing barriers to prevent dust from leaving the source area, and halting operations during high wind events
- AIR 22            Provide monitoring of fugitive dust during construction, operations, and maintenance to ensure effectiveness of mitigation measures
- AIR 23            Evaluate the air quality impacts within the non-attainment area, including direct emissions from pipeline construction and operation and indirect emissions from the increase in population and activities due staging within the non-attainment area
- AIR 24            Evaluate whether the proposed project would improve or hinder progress in air quality attainment for PM2.5

**AIR            Air Quality or Emissions/ Climate Change/ Green House Gases**

*Comments related to air quality, air emissions, climate change, or green house gas (GHG) emissions.*

- AIR 25            Provide mitigation and monitoring to ensure that air quality effects are neutral or beneficial in the Fairbanks area
- AIR 26            The Supplemental EIS should discuss whether transportation and general conformity analysis is required (i.e., whether the relevant emissions for PM2.5 exceed the de minimus thresholds) and how this proposed action would comply with the Alaska SIP
- AIR 27            If a general conformity analysis is determined to be necessary, it should be integrated with the NEPA process and incorporated into the Supplemental EIS
- AIR 28            Evaluate whether there would be any adverse effects to a designated Class I area
- AIR 29            If a PSD review for pollutants is determined to be necessary for this project, it should be integrated with the NEPA process and incorporated into the Supplemental EIS
- AIR 30            Develop mitigation measures to minimize adverse impacts
- AIR 31            Include a monitoring plan to ensure effectiveness of the mitigation measures
- AIR 32            The air quality analysis should identify the location and emission estimates from gas flaring
- AIR 33            Develop mitigation measures to minimize adverse impacts from gas flaring
- AIR 34            Develop a GHG emission inventory that includes baseline emissions, direct and indirect projected related emissions, and emissions from reasonably foreseeable activities over the life of this project. Identify the sources of GHG emissions and evaluate their contributions
- AIR 35            Characterize and quantify the expected annual and cumulative emissions due to construction and operation of the GCF and ancillary facilities, and the pipeline using CO2-equivalent as a metric for comparing the different types of GHG emitted over the life of the project
- AIR 36            Evaluate future needs and capacity of the GCF and ancillary facilities, and the natural gas pipeline to adapt to project climate change effects. Establish reasonable spatial and temporal boundaries for this analysis.

**AIR            Air Quality or Emissions/ Climate Change/ Green House Gases**

*Comments related to air quality, air emissions, climate change, or green house gas (GHG) emissions.*

- AIR 37            Disclose the differences between GHG emissions associated with each alternative analyzed in detail.
  
- AIR 38            Describe the link between GHG and climate change, and the potential impacts of climate change on the structural integrity of the proposed project, such the melting of the permafrost on gravel pads and roads, etc.
  
- AIR 39            Estimate the extent that melting permafrost associated with this project would contribute to GHG emissions
  
- AIR 40            Describe efforts to monitor for GHG emissions and climate change impacts throughout the lifecycle of this project
  
- AIR 41            Concerns about air emissions affecting forest health. Suggesting analysis of air emissions impacts on habitat.

**AKN Alaska Native Issues**

*Comments on the analysis of the cultural and social impacts of the alternatives on Alaska Natives.*

AKN 1 Work with the State Historic Preservation Office and the Office of History and Archaeology to identify cultural and archaeological resources within the project area, within Denali State Park and Willow Creek State Recreation Area.

AKN 2 I did not see the Bureau of Indian Affairs or Native cooperations on the list of parties involved. They have a lot of land and should be coordinated with.

AKN 3 Consider impacts of climate change on vulnerable communities, such as to Alaska native communities and their traditional way of life

AKN 4 Develop a Tribal government-to-government (G2G) Consultation Plan (G2G Plan) which would outline the process for working effectively with tribal governments during the Supplemental EIS development process. The G2G Plan should include a schedule with agreed upon timelines and milestones for consultation, meetings, and decision points

AKN 5 The G2G Plan should determine the best timing for conducting the consultation meetings which would avoid conflict with Alaska Native Village subsistence, cultural and religious seasons, which varies with each community

AKN 6 The G2G Plan should be developed in collaboration with the affected and/or interested tribal governments. Tribes should have the opportunity to review, provide comments and concurrence with the G2G Plan

AKN 7 Tribal government-to-government consultation and coordination should be open, meaningful, and occur throughout the Supplemental EIS process until the Record of Decision (ROD) is issued

AKN 8 Discussion how tribal government concerns and issues raised during government-to-government consultation meetings will be recorded, whether or not the tribe wishes that information to be made publicly available and an opportunity to correct any information prior to it being included in the record should be discussed and agreed up front for each meeting. Some tribes may wish to have their comments entered into the record or wish the meeting to be held confidentially as it is a government-to-government consultation. Therefore discussing this up front prior to the meeting is critical

AKN 9 The Supplemental EIS should document the tribal consultation and coordination process by providing a chronology with the dates and locations of meetings with tribal governments, and results of the meeting

**AKN Alaska Native Issues**

*Comments on the analysis of the cultural and social impacts of the alternatives on Alaska Natives.*

- AKN 10 The Supplemental EIS should discuss how the tribal governments' comments were addressed through changes in the project design, evaluation of alternatives and impacts, and development of mitigation measures
- AKN 11 Meetings, milestones, and decision points in the Supplemental EIS process should avoid conflicts with subsistence, cultural, religious, and other traditional activities, whenever possible
- AKN 12 Tribes should be notified of the key decision points and milestones in the Supplemental EIS process
- AKN 13 The consultation and coordination process should be used as an opportunity to provide educational outreach and technical exchange of information regarding the project. Fact sheets and workshops (either in person, teleconference, or webinar) should be provided to Tribes throughout the NEPA process
- AKN 14 The consultation and coordination process should be used as an opportunity to gather Traditional Ecological Knowledge and Wisdom (TEKW) from the local tribal members who may be affected by this project. This should be done in partnership and close consultation with the federally recognized tribal governments
- AKN 15 Coordinate with the communities in the project area to identify special habitat areas, migration corridors and seasonal patterns, current and historical traditional and cultural uses, timelines and schedules for subsistence, hunting, fishing, harvesting, trapping, recreation, etc. and their way of life
- AKN 16 Review current information available from previous EISs and databases regarding subsistence resources. Identify TEKW data gaps, and conduct additional TEKW studies as necessary to clearly identify concerns and potential impacts, including cumulative, from the proposed project and proposed alternatives
- AKN 17 TEKW should be incorporated into the Supplemental EIS to evaluate project modifications, alternatives, environmental and human health impacts, and to develop mitigation and monitoring measures

## **AKN Alaska Native Issues**

*Comments on the analysis of the cultural and social impacts of the alternatives on Alaska Natives.*

- AKN 18 In working with the communities to document and incorporate TEKW into the Supplemental EIS, it is important to acknowledge up front appropriate tribal protocols for how this information could be used and how to ensure that sensitive information is protected. The Alaska Native Science Commission has principles that were developed in regards to appropriately working with TEKW, <http://nativescience.org/issues/tk.htm>
- AKN 19 Scheduling meetings and decision points in the Supplemental EIS process should avoid conflicts with subsistence and other traditional activities whenever possible
- AKN 20 Provide more frequent opportunities to involve the tribal governments and the public (between the Scoping and the Draft Supplemental EIS stage)
- AKN 21 Conduct educational workshops on various subjects that would bring in the Traditional Ecological Knowledge and Wisdom and local knowledge of the people of the region (e.g., information to help shape the NHPA Section 106 process, the emergency response planning, characterizing impacts from potential failure scenarios, impacts to subsistence resources, and timing of the subsistence calendar and any special habitat areas for wildlife)
- AKN 22 Consider historical impacts to health and overall cultural well-being
- AKN 23 NHPA Section 106 consultation should be conducted with tribal governments, local governments, the public, in addition to SHPO
- AKN 24 Evaluate the Native Alaskan historical and traditional significance of the project area, the importance of ethno botany, hunting, fishing, and gathering uses of the area by Alaska Natives, any long term traditional ecological management of the area, and any significant historic events that took place in the area
- AKN 25 The scope of impacts to these resources should include the direct, indirect, and cumulative impacts to sacred sites; traditional cultural properties or landscapes; hunting, fishing, gathering areas; access to traditional and current hunting, fishing, and gathering areas and species; changes in hydrology or ecological composition of springs, seeps, wetlands, and streams, that could be considered sacred or have traditional resource use association; historical and currently used travel and migration routes; and historic properties, districts or landscapes

## AKN **Alaska Native Issues**

*Comments on the analysis of the cultural and social impacts of the alternatives on Alaska Natives.*

- AKN 26 Conduct the Section 106 NHPA consultation process concurrent with the Supplemental EIS process. The Section 106 process should be completed prior to issuing the ROD, which would provide for the implementation of the MOA terms.
- AKN 27 A research study of how the natural gas pipeline would affect customary and traditional use of wild game should be implemented. Research study such as this will enable and provide the local customary and traditional users documentation it's affects by the proposed natural gas pipeline.
- AKN 28\* Our tribal concerns are environmental integrity and how are we going to participate in this fully, given that, that the current pipeline crosses 60 miles of our traditional lands that we had claimed aboriginal title to. We lost 90% of our traditional land. I'm glad that there is this consultation exercise with the regulating agencies, government-to-government consultation, so our concerns go on record. There is a 10-mile wide utility corridor that crosses our traditional lands; we have learned a lot in regards to the oil and gas industry, ensuing legislation, the fallout of it.
- AKN 29\* Cultural and archeological investigations need to be done fully, unlike when the pipeline went in and they didn't consult with us. They didn't have tribal elders and experts out there pointing out culturally sensitive areas. We would like the tribes to have a meaningful role in the cultural investigations.
- AKN 30\* We would like to see what regulations allow respect to culturally significant areas. Also, cultural sensitivity training should be mandantory for long-term employees. We don't want to see another tribe lose 90% of their land. And the region is going to start getting populated. What can be done to ensure those kinds of things don't happen?
- AKN 31\* Native land claims were established when TAPS was built. FERC/BLM had to get that done before allowing the pipeline to be built on the Native land. BLM as to take care of the veterans' 160-acre allotments that they were supposed to get in 1991, 1992, and 1993, that the BLM said there was no land in the state of Alaska to have. Now they're writing ROWs without taking care of Native veterans.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## AKN **Alaska Native Issues**

*Comments on the analysis of the cultural and social impacts of the alternatives on Alaska Natives.*

- AKN 32\* We're concerned that there are likely to be cultural resources on the shores, the banks of the Yukon River. In your cultural resources section, there are a bunch of black dots at that site which indicate that there are cultural resources a mile away from the proposed crossing. But I think it would be really important to ensure that the local villages and traditional-use patterns are considered for that site, because it's particularly a hotbed of cultural resources.
- AKN 33\* Section 30 should be addressed with the BLM. The tribe submitted their impacts and requested that the BLM take action under Section 30 but they received a letter back that said they could only receive scientific formats and they have to have all the baseline. Basically, "If your tribe isn't a western-educated science department and you have scientists, that we can't accept traditional ecological knowledge; it doesn't hold water." The same thing with the Federal Subsistence Board, when the tribe says they want to safeguard their resources from degradation, the system doesn't recognize traditional ecological knowledge.
- AKN 34\* Native communities need to be compensated for loss of resources. When the TAPS was put in they said they were not going to affect subsistence, and the State agreed that they were not going to allow hunters to come north, and now they are coming north. People from Anchorage now hunt caribou at the mouth of the Sag River. They are interrupting spawning fish in the Sag when they hunt. The State said they would leave Natives alone with their subsistence hunting but have gone back on their promise. Anchorage and Fairbanks residents sportfish with airboats on the Sag. The State won't keep its promise for this project either.
- AKN 35\* The BLM has abused power with comments about scientific language. Respect needs to be paid to cultural concerns as it is to the monetary gains that they're going to make. If we can get something that says these promises will be kept, and that they will take care of our state, then we would feel much more comfortable.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

**ALT****Alternatives**

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

ALT 1

The SEIS should consider the extension of the Fairbanks Lateral Line to North Pole Industrial Hub as well as extension of line to western Alaska as well as various small communities.

ALT 2

Willow Area Community Organization (WACO) issued a resolution dated June of 2011 specifically objecting to the alignment of the ASAP pipeline through the Willow Creek State Recreation Area. The alternatives listed in that resolution were to utilize the existing three industrial corridor's that run from North to South through the Willow community already, namely the Parks Highway, the Railroad, and the Anchorage-Fairbanks inter-tie.

## ALT

### Alternatives

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

#### ALT 3

Commenters suggest multiple re-alignments of the corridor in the Denali-Willow area as follows: MP 604 - Cross to west side of Parks Highway and place the pipeline adjacent to the highway paralleling it on the west side. MP 606.5 to MP 618.5 - Place the pipeline adjacent to the Parks Highway on the west side. Even though the route is longer it is important in Denali State Park to not have separate cleared rights-of-way. MP 618.5 to MP 624 - Place the pipeline adjacent to the Parks Highway on the west side. MP 625 to MP 627 - Place the pipeline on the west side of Parks Highway and adjacent to it. MP 628 to MP 634 - Place the pipeline on the west side of Parks Highway and adjacent to it. MP 634 to MP 635 the pipeline is proposed to cross Troublesome Creek and then the Chulitna River. It would be far less intruding to park users and bears to cross the Chulitna River north of Troublesome Creek and avoid Troublesome Creek all together. MP 636 to MP 640.2 - Place the pipeline route along the west face of the hill in this area so that the cleared right-of-way will not be visible from Curry Ridge. The materials source site at MP 641 is far too close to the Jigsaw Puzzle Lakes. The south boundary of this materials source site should be moved further north to allow a larger setback from the lakes. This access road could very easily be realigned to the existing 33 foot easement that exists on the Southern border of our property. This would eliminate the traffic conflict, and allow safe passage of both vehicles and airplanes. To avoid this conflict I would suggest two alternatives. The first is depicted by a green line running from East to West along the Section 25 Southern border "section line" easement. This would reside entirely on State of Alaska, DNR land and would not impact private property directly. The easement runs all the way out to the Parks Highway. Utilizing this easement would avoid vehicular traffic through the subdivision during construction, and would provide for long term dust mitigation and avoid conflict with the numerous Dog Teams, snowmobiles, and all-terrain vehicles that utilize the subdivision roads while accessing trails, along with pedestrian and residential vehicular traffic. There is however an existing trail that is used daily by the residents of the subdivision along this section line. With enough clearing, the access road and trail could be co-located, with the need for at least one trail crossing point from North to South to access the Historic Emil Stancic and Lucky Shot trail systems. The second alternative would be to utilize the existing subdivision roads to the Serenity Drive culdesac. This route is depicted by an orange line. Leaving the culdesac it would travel south along the eastern property line border of my property and then intersect with the Section 25 southern border section line easement and resume a western direction to the ASAP pipeline.

## **ALT**

### **Alternatives**

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

- ALT 4      Emptied material sites should be lined to create lakes (swimming pools) for locals and wildlife.
- ALT 5      If the camp at the Willow Creek Parkway is moved, it will create a site for a future wastewater treatment plant for Willow.
- ALT 6      Trails are often used to stop, divert and add cost to these projects. Can trails be added down the side of the line? These passage ways will be used anyway. Could parking lots be designed in at some road crossings as the dirt is moved? Can these passages be designed to be used later as fire breaks or as roads? Can land alongside the route be used as farmland the State could sell?
- ALT 7      Cooperation between the project and lumber companies to harvest trees in the right-of-way should be done to make lumber and wood chips.
- ALT 8      If the intent of the ASAP pipeline is truly to benefit communities along the length of it, with off takes for residential use of natural gas, it should follow the existing roads and highways where Enstar has always traditionally run their distribution lines.
- ALT 9      ASAP has not done any research into the Willow community planning process (i.e., the Willow Summer Trails Plan, Willow Winter Trails Plan, Susitna Basin Development Plan and the Matanuska Susitna Borough Trails Plan). The proposal is to place a large camp in our neighborhood on Alaska State Park Land, and to open a large gravel pit in a residential area of our community which is concerning.
- ALT 10     A 33-ft. shift in the route alignment would avoid the runway on my property.
- ALT 11     The Fairbanks Lateral crossing of Hard Luck Creek requires a steep, approximately 1400 ft. descent to cross the creek and then an equally steep 1400 ft. plus ascent to return to the ridgeline. Engineering should consider eliminating this crossing by keeping the pipeline on the ridgeline. This would allow easier, faster installation and would eliminate problems related to installing a pipeline on steep slopes as well as rehabilitating the ditch line and work area in these steep areas.
- ALT 12     In the Livengood to Dunbar reach, there are two temporary or permanent access roads proposed that are 20 to 25 miles long. Consider eliminating these roads and use the fill material to upgrade the pipeline work pad to provide access. This would reduce wetlands impacts, gravel required and the overall project footprint.

## ALT

## Alternatives

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

- ALT 13 Material Sources MS 1C-E and MS 1C-F occur between the Dalton Highway and Oksrukuyik Creek near Slope Mountain. Winter groundwater flow in and near the creek that may adversely affect winter or summer gravel operations. Consider expanding the existing nearby ADOT&PF material sites (MS 1D-A) at the Sag River Camp or establishing a new site along the Sagavanirktok River about 0.3 miles north of the existing Sag River Camp north material site.
- ALT 14 Material Source 3B-G is located within the Minto Flats State Game Refuge. Previous discussions with ASAP personnel indicated material sites within the Minto Flats State Game Refuge would be relocated outside of the refuge boundaries.
- ALT 15 The natural gas pipeline route should be located along the Alaska Railroad easements so existing test drilling data on gravel and sediments could be used from Railway and Road corridors. Locating the pipeline along the new railroad easement down to Pt. MacKenzie would save money.
- ALT 16 Damage to streams, wetlands, mushing and snowmachining trails could be minimized if the pipeline was located along the railroad easement to Point MacKenzie.
- ALT 17 The pipeline should be routed along the TransAlaska Pipeline System.
- ALT 18 Consider located the pipeline route along the TransAlaska Pipeline System. The communities around Denali National Park and Preserve do not have the infrastructure to use natural gas and the proposed route would scar the landscape. Residents in this area earn a living from this pristine wilderness which would be impacted by the pipeline.
- ALT 19 Routing the pipeline corridor on the west side of Willow would result in unauthorized access to Nancy Lakes Recreation Area which would conflict with existing planning processes for recreation trails. Consider an alternative route on the east side of Willow following an "industrial corridor" of the railroad and Electric Intertie to the pipeline terminus near Pt MacKenzie to avoid conflicts with recreational use and plans. The current alignment has been opposed twice already by Willow Area Community Organization (WACO). Sharing the corridor with the Alaska Rail Road, the Parks Highway, or the Electrical Intertie transmission line will reduce cumulative impacts.
- ALT 20 Consider alternative routes around the east side of Willow because the current route is close to the dense residential area and the proposed man camp is adjacent to the community park.

## ALT

## Alternatives

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

- ALT 21 The Willow segment of the ASAP corridor is very similar to the one that was considered by the Alaska Railroad in the EIS from 2011, which concluded that the route had too many environmental impacts.
- ALT 22 Can AGDC inform us as to why the routing changed from straight down the ADOT ditch line in most sections of the pipeline to totally away from the ADOT ditch line? Is it related to PHMSA requirements on pipe thickness and it's cheaper to get away from the ditch line?
- ALT 23 When will the alignment be finalized? Instead of taking the pipeline across wildlands, consider an alignment that follows the highly impacted road corridor to minimize environmental and property owner impacts. Additional river crossings with the new alignment add to the cost of constructing access roads. Access for maintenance would be a lot easier along the highway. Many landowners in the interior will be impacted by this current alignment.
- ALT 24 The proposed camp in a state game refuge near Mile 1 of Willow Creek Parkway is of concern.
- ALT 25 Willow Area Community Organization (WACO) issued a resolution dated June of 2011(attached) specifically objecting to the alignment of the ASAP pipeline through the Willow Creek State Recreation Area. The alternatives listed in that resolution were to utilize the existing three industrial corridor's that run from North to South through the Willow community already, namely the Parks Highway, the Railroad, and the Anchorage-Fairbanks intertie. The alignment of the Railroad spur from Point Mackenzie through Willow Creek State Recreation Area was specifically opposed by WACO and the rail spur was subsequently moved to Houston. Utilizing the existing industrial corridors through Willow to join with the already approved 300' wide easement of the Point Mackenzie Rail Spur to tidewater makes the most environmental sense.
- ALT 26 Consider retaining public parking access at Mile 190 Dalton Highway (the confluence of the Kuyuktuvuk Creek and the Dietrich River) and access at Galbreath Lake.
- ALT 27 Please consider re-routing the pipeline to the west side and then cross north of Troublesome Creek to avoid disruption to trailheads and wildlife along the southern portion of Parks Highway. Consider moving the pipe yard and camp to MP 128 where land is flatter.

## **ALT**

## **Alternatives**

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

- ALT 28 As part of the proposed project, consider extending the lateral line to the North Pole area and include a second regulator depressurization point there as well where Golden Valley Electric Association has turbines. Two refineries are also located there.
- ALT 29 The change in route from the AK railroad grade into Fairbanks to the route over the top of Murphy Dome Road and through subdivisions is problematic and not understood. The terminus of the existing lateral line seems arbitrary.
- ALT 30 The change in route from the Alaska railroad grade into Fairbanks to the route over the top of Murphy Dome Road and through subdivisions was not communicated clearly and not understood by the public.
- ALT 31 Is it possible to have a lateral line to Bettles and what would the potential cost of that be? How could Bettles contribute to this idea?
- ALT 32 Northwest Alaska, specifically Nome and Kotzebue, should be evaluated for port development and possible exports to China.
- ALT 33 Consider just connecting one village (i.e., Nuiqsut) to see how the system works first before going to every village.
- ALT 34 Develop criteria, in coordination with cooperating agencies based on stakeholder comments, that would be used to (1) identify a range of reasonable alternatives; (2) eliminate alternatives from further consideration (3) identify the environmentally preferred alternative, and (4) identify the least environmentally damaging practicable alternative (LEDPA). Criteria could be based on the conservation of important aquatic and terrestrial habitats, maintaining wildlife and fish passage, maintaining subsistence and socio-cultural resources, practicability (e.g., logistics, technology, and costs), regulatory requirements, etc. Describe the process, the rationale, and the basis for how these criteria were developed.
- ALT 35 Evaluate alternative pipeline and road alignment routes and options, such as co-locating the Fairbanks lateral line with the Parks Highway
- ALT 36 Evaluate the use of ice roads or snow roads in the winter season for transportation of equipment and supplies on tundra wetlands.
- ALT 37 Evaluate alternative locations for the port facilities, and alternative configurations for the GCF pad, camp facilities, facility designs, etc

## ALT

## Alternatives

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

- ALT 38 Consider and analyze a different route for the pipeline, which would avoid locating the pipeline in the Minto Flats, and placement of new permanent gravel access roads and material source sites
- ALT 39 There are too many proposed material source investigation sites near Wiseman. Three large MSIs are proposed within 3 miles of Wiseman. MS2A-C is in the viewshed of scenic by-way the Dalton Highway. The site at ASAP MP 232 is in the viewshed of Wiseman. The MS 2A-F site will hinder access to subsistence hunting areas on Nolan Road. The site at ASAP MP 221 will ruin a historic camping area with historic trail and overwintering habitat for caribou. The MSI extension at Marion Creek ASAP MP 237.5 will impact game trails and hiking trails near the Marion Creek BLM Campground. The integrity of Wiseman access road would not support multiple large trucks.
- ALT 40 Some sections of the pipeline will impact culturally significant areas to the Knik Tribe, ASAP MP 674-676 and MP 713-717 in particular. MP 674-676 is where the Dena'ina village is located, at the mouth of Little Montana Creek. Several cultural sites are mapped here. MP 713-717 is the area around Red Shirt Lake, Cow Lake, and the crossing of Fish Creek. Several cultural sites exist here too, much of the history of the area remains unknown. The pipeline and access roads that cross Red Shirt lake are of particular concern.
- ALT 41\* Again, Ahtna would like to voice our concern about the placement of the pipeline in such close proximity to residential homes in Cantwell.
- ALT 42\* On this Alaska only line, it goes -- you're exporting the end product? And the reason I was asking that is, the other proposal [Alaska Pipeline Project] to build the line was going to go to the Lower 48, right? And on the other line, it was supposed to go down through Canada to the Midwest, right? The reason I was asking if you're looking at exporting, I thought, you know, the -- when you look at it, I thought keeping it in America was a better concept. Because if it goes through Canada, then it goes through Alberta, and from Alberta, it goes out to the Mid -- to the Midwest in the Lower 48. And if it went that route, see the gas coming out of the tar sands is high in sulfur, and if they trunk down sweet gas, gas without sulfur, it wouldn't clean the gas up going to the Lower 48. And that's what I thought was going to be the plan.
- ALT 43\* Is this strictly going to be a transportation line or is it also going to be a service line?

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## ALT

## Alternatives

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

- ALT 44\* Is Anaktuvuk Pass getting a trunk line if they decide to connect? If you're going to supply Alaska, you can't just look at Anchorage and Fairbanks, and whoever's on the route, like Delta and Palmer, you have to also include the Bush communities, that are within reach. You can't say you're going to take care of Alaska, when you ignore all the smallest communities, where the fuel heating system is at its highest, at a price that nobody else but the people themselves are paying. They pay more than two or three times what you pay in gasoline in Anchorage or Fairbanks; maybe four in some places. And if you're going to build a gas line, and you don't even consider them, maybe it's best to leave the gas where it's at, if you're not going to take care of the people.
- ALT 45\* It states that the route the pipeline is mandated to follow is the Alaska Pipeline to Fairbanks. What determined your route after Fairbanks, and, in other words, why couldn't the route have come down through Delta down to Valdez. And questioning that economically speaking, it could have benefited some of our tribal members down in this area, as well.
- ALT 46\* How can it be less environmentally destructive to take off above Fairbanks and go down the rail belt rather than follow the pipeline along Glennallen and then across to Anchorage (what they label the major route alternative under Figure ES-3)? They say it would impact less wetland, yet they're going to cross Minto Flats.
- ALT 47\* Environmentally speaking, the Village of Gakona would be opposed to this [the route following the rail belt south of Fairbanks], and we would prefer the alternative route that would go along the pipeline as being more environmentally fit. The end result would still be that the gas would end up down there near Anchorage, and it would be far more feasible to use the rail line to all the places in Alaska rather than truck it.
- ALT 48\* They're going to have a cleaning plant because they show this lateral running to Fairbanks. This isn't usable gas coming down this pipeline.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## **ALT Alternatives**

*Comments that support or reject the preferred alternative or suggest new alternatives and alignments.*

- ALT 49\* The pipeline running out to Canada is not economical, in discussions with FERC. But that project is going to refine the gas on the Slope, and any village could tap into it by simply setting a reducing valve. Chickaloon Village thinks this is a good deal for cheap gas. Villages along the way should only have to pay a percentage of the pipeline, that should be pro-rated as to how much pipeline they are using, so the people closer to the source would get the best deal.
- ALT 50\* The route to Valdez is preferred because it uses the multi-use right-of-way and there are more communities on the route to supply gas to.
- ALT 51\* It is un-American to export gas instead of using it within our country.
- ALT 52\* The pipeline route is objectionable. The route should follow the TAPS. It would have less of an environmental impact, and rural communities would benefit.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## ECO

### Economy

*Comments regarding economic impacts of project.*

- ECO 1 The winter economy relies heavily on winter trail use and summer trails are currently being developed to generate a healthy community. Concern that the pipeline might impact this important economic contribution.
- ECO 2 The pipeline route will negatively affect tourism in Denali National Park, primarily because of negative visual effects and trail devastation.
- ECO 3 There should be an explanation included in the SEIS of the equipment and costs involved with a community takeoff from the main line - such as at Healy or near the entrance to Denali.
- ECO 4 Who are the major beneficiaries of this project?
- ECO 5 How is the gas going to be delivered in an economical way to people off the proposed pipeline route?
- ECO 6 How is gas going to benefit people in villages that suffer from exorbitant utility bills across the state?
- ECO 7 Who pays for the route and why and how are gas rates going to be set?
- ECO 8 Fairbanks residents are concerned about needing to convert a gas product for use in their homes; different types of boilers, different types of furnaces, getting rid of wood stoves, coal burners. While the prospect of gas is positive, the potential costs of converting heating systems is concerning.
- ECO 9 Our community is paying a high price for fuel oil. Consider exploring for natural gas or methane gas further west. North slope communities are held second to the large producers and operators.
- ECO 10\* The TAPS ROW agreement called for 20% Native hire, but to my knowledge that number has never been attained. Our concern is training and educating residents for trade-labor jobs, professional long-term jobs for running and maintaining the infrastructure.
- ECO 11\* The bush communities along the line do not represent a large enough customer base for take-off points to be economical. If the state makes a lot of money on this the rural areas will still be left with crumbs.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## ECO

### **Economy**

*Comments regarding economic impacts of project.*

ECO 12\*

And it's [the route following TAPS along Glennallen and across to Anchorage] going to benefit more Bush villages, where the fuel costs are higher, but, also, give more jobs to people in this area.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## EDI

### Editorial

*Comments providing suggestions for improving the organization and readability of the document as well as accuracy of the content.*

- EDI 1 Correction for Adjacent Property Owners list: Please check 004-C-10-C-Y-0005 for community marker for Talketna and Trapper Creek. Commenter's address is wrong; the address should be PO Box 2, not 25.
- EDI 2 On page 215 of the AGDC Plan of Development, Willow Creek is mislabeled as the Susitna River.
- EDI 3 This section labeled "Maps and Drawings Showing River Crossings" actually directs the reader to a list of potential stream crossings in Attachment 4. This section should be renamed as "Potential River Crossings."
- EDI 4 Spread 1B states the location as PS-1 to Sag-Atigun Confluence, MP 7-57. The Sag-Atigun confluence would be at approximately MP 145. The southern end of this section should be called the Sag -Ivishak confluence. Also change Spread 1C.
- EDI 5 The text indicates "a listing of potentially sensitive areas and fish habitat along the proposed route is found in Attachment 6". Attachment 6 contains figures of Game Management Units and Caribou Herd Ranges, and figures depicting anadromous fish streams. It does not list potentially sensitive areas (undefined), nor does it list fish habitat (resident or anadromous fish) along the route. The last sentence of this section's first paragraph should identify what is actually in Attachment 6 - figures of Game Management Units and Caribou Herd Ranges, and figures depicting anadromous fish streams.
- EDI 6 Personal Communications should reference the person contacted - not the company.
- EDI 7 The Middle Fork Koyukuk River is incorrectly identified as the John River in these two figures.
- EDI 8 The Big Salt River is incorrectly identified as the Yukon River in this figure.
- EDI 9 The stream crossing table should identify whether winter or summer installation is proposed for each crossing to better assess the potential impacts of the proposed installation.
- EDI 10 Add the commonly used names for creeks in the Prudhoe Bay to Livengood reach to avoid the large number of "name unknown" streams. These commonly used names have been supplied by ASAP for project geotech permitting. Also see the BLM Alaska Open File Report 105, Fish Streams along the Trans-Alaska Pipeline System.

## EDI

## Editorial

*Comments providing suggestions for improving the organization and readability of the document as well as accuracy of the content.*

- EDI 11 It would be useful to cross reference the ASAP material site name with the ADOT&PF/Alyeska site name for active sites being considered for use.
- EDI 12 The figures on pages 72-126 appear to be duplicates of earlier figures in this appendix.
- EDI 13 The report states, "ASAP engineers are working under the assumption that the material sites will be new and will have to be developed." Comments under 2.1.5 apply. The total quantity of material required is approximately 2.5 times more than what was shown needed in the FEIS. I assume this is due to better/refined information. Again, ADOT is interested in joint use of any new quality material sites developed along the Dalton and Parks highways. We see this as a positive impact.
- EDI 14 Text in paragraph one notes that "Access to gas will also help to meet the need for improving air quality in the Fairbanks area, which is adversely affected by the combustion of wood and expensive heating fuels." It should also be noted that residents of that area may also be burning coal, which can also have a detrimental effect on air quality.
- EDI 15 The word "material" is misspelled in the first sentence of section 2.1.5.
- EDI 16 Please spell out acronyms such as PSY the first time it appears in a section. Many readers will only be interested in specific sections and it is cumbersome to have to look up acronyms.
- EDI 17 Please spell out acronyms such as MAOP the first time it appears in a section. Many readers will only be interested in specific sections and it is cumbersome to have to look up acronyms.
- EDI 18 Please spell out acronyms such as GCF the first time it appears in a section. Many readers will only be interested in specific sections and it is cumbersome to have to look up acronyms.
- EDI 19 It is not clear if bullet number three at the bottom of the page refers to the Denali Borough landfill. Also, you may need to review this list to ensure that all of the landfills listed are current permitted landfills. According to the Solid Waste Program database some of the landfills listed on paged 65-66 are not currently permitted landfills.

## EDI

## Editorial

*Comments providing suggestions for improving the organization and readability of the document as well as accuracy of the content.*

- EDI 20 Please spell out acronyms such as CWMP the first time it appears in a section. Many readers will only be interested in specific sections and it is cumbersome to have to look up acronyms.
- EDI 21 The second entry on this table references 18 AAC 60.200. The correct citation for the 401 Certification for the 404 Permit should be 18 AAC 70.200. Please also add an entry for the Alaska Construction General Permit and the Hydrostatic General Permit mentioned above.
- EDI 22 The second entry on this table references ADEC Division of Water as the applicable agency. This should be changed to reflect ADEC Division of Environmental Health, Drinking Water Program
- EDI 23 The first entry on this table references ADEC Division of Water as the applicable agency. Please note that permitting of Class 1 Injection wells fall under the regulatory authority of the Environmental Protection Agency. The actual discharge to the wells is covered under an ADEC Water Division General Permit:
- EDI 24 The project description maps require attention to make the project components more informative for the public and land managers. Improvements that could be made include depictions of land status and private parcels along the pipeline route, labels for existing infrastructure (i.e. highways, pipelines, communities, etc.), and more distinguishable color schemes for ease of viewing.
- EDI 25 All publicly available maps should clearly explain that material sources, pipeline alignments, access roads alignments, and other facility infrastructure are proposed until the project is authorized by all permitting agencies
- EDI 26 In the plan of development revision there's neither mention nor an acronym/abbreviation Denali State Park (DSP) or Willow Creek State Recreation Area (WCSRA) – we would like to see this added to any future documents.
- EDI 27 There's no mention of the ADNR Division of Parks and Outdoor Recreation (DPOR) – we would like to see this division mentioned under the section denoting state agencies.
- EDI 28 All of the disturbance acreage calculations in the SEIS need to be changed because, among other changes to the project, the typical temporary construction easement is now given as 120 feet instead of 100 feet.

## EDI

## Editorial

*Comments providing suggestions for improving the organization and readability of the document as well as accuracy of the content.*

- EDI 29 A draft Clean Water Act Section 404(b)(1) compliance determination for the preferred alternative should be included in the Draft Supplemental EIS as an Appendix
- EDI 30 There are conflicting site selections on the "Material Site Interior" map and the Wiseman Community Imagery "Mineral Investigation Sites."
- EDI 31\* In the PEIS under Section 1.3 Tribal Consultation is a list of 28 tribes who remain potentially affected by the proposed project. The Native Village of Cantwell is not on this list. This is despite the fact that the route planned for this project goes right through Cantwell Village lands. There is no list of the original 41 tribes contacted with possible concerns related to this project. What is the route elimination process that removed the Native Village of Cantwell from the list of potentially affected tribes?
- EDI 32\* The South Central communities listed on Page 5.14-48, should include 7 Ahtna villages. These are Cheesh'na, Chitina, Gakona, Gulkana, Native Village of Kluti-Kaah, Mentasta, and Tazlina. All of these villages are not within 30 miles of the affected area of the proposed gas line project; however, all these villages will be affected by the socioeconomics, construction, operation and maintenance of this proposed project.
- EDI 33\* There is an undefined acronym: "TT" found in the anadromous stream crossing table.
- EDI 34\* Executive summary page 4 lists one of the purposes and needs for the proposed action. The second bullet is regarding Fairbanks' harmful air emissions and this project would help reduce that. It lists that the use of oil and wood for heating are major contributors to the problem of air pollution in winter, but coal is not listed in that bullet. However, later in the executive summary, on page ES-18, it lists coal and oil and wood. Coal should be written in the first issue with Fairbanks' air pollution.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## EFF

### Effects of the Proposed Project/ Analysis of Effects

*Comments on the potential effects of the proposed project, analysis of effects (including direct, indirect and cumulative) or the methodology developed to analyze the alternatives.*

- EFF 1      ATV use of local trails and across muskegs in the summer does environmental damage to these fragile wetlands. Please restrict access by construction workers and prohibit them from recreating and hunting with ATV's on their off hours.
- EFF 2      The Plan of Development (POD) is short on detail regarding the location of the Marshalling Yard (MY) to be located in Fairbanks. The SEIS needs to address the impacts of both the MY and the support site located in Seward as it pertains to transportation in and out of these sites. How much additional truck traffic is expected on the Richardson Hwy? Will additional acceleration or deceleration lanes be needed? What routes are expected to be used for traffic departing this MY? The timing of pipeline construction and the timing of anticipated roadway construction needs to be addressed in the SEIS.
- EFF 3      The SEIS needs to address the impacts of the use of the Dalton and Parks Highways for transport of equipment, materials, personnel and the overall construction operation of the gas line. What impact will construction have on safety, congestion, roadway maintenance and wear on the highway surface?
- EFF 4      What are the potential effects to the highway system, Dalton and Parks Highways, the local roads in affected communities, Fairbanks, Seward, etc. – safety, congestion, maintenance, surface wear, etc.
- EFF 5      Comments regarding the need to minimize damage to streams, wetlands, mushing and snowmachining trails.
- EFF 6      The right-of-way will allow access to sensitive wetlands and anadromous streams.

## EFF

### Effects of the Proposed Project/ Analysis of Effects

*Comments on the potential effects of the proposed project, analysis of effects (including direct, indirect and cumulative) or the methodology developed to analyze the alternatives.*

- EFF 7 The conclusion from the 2012 FEIS that the route will not have long term impact on recreation in the Willow area is incorrect. This comment was ignored and must be considered in this SEIS. The proposed pipeline route is a poor choice because it: passes through an area of Willow's highest density residential and recreational use; passes through the Willow Creek SRA and an intensely managed trail system; conflicts with our community effort and funding to design and develop recreational trails that are based on user experiences, natural settings, specific destinations and reduction of impacts on natural resources; creates an unplanned "trail," disrupting designed trail flow on established trails; places a man camp adjacent to a community park and trailhead and blocks the popular and historic Lucky Shot Trail; places a possible material site that would during pipeline construction block the Windsock Trail and impacts the Shirley Lake Trail.
- EFF 8 Willow does not have the infrastructure such as city water, sewer, etc. to support construction workers. Consider day-use or small construction camps. The 1,000 man campsites indicated could be a tremendous impact to a small community like Willow. This may be better accomplished by bussing workers from facilities in the Wasilla area that has the existing infrastructure which can support this large type of housing.
- EFF 9 Comment requesting that surveyors who access private land this summer please share the information collected because private land was accessed 12 different times.
- EFF 10 Concerns were expressed about the construction zone being widened from 100 feet to 120 ft. There are many projects being planned now including pipeline and roadway projects. There may be conflicts with these projects and potential cumulative impacts.
- EFF 11 In the DSEIS, the Corps should analyze not only the potential impacts of vessel traffic noise and disturbance on the bowhead whale subsistence hunt, but also discuss the cumulative impacts to our bowhead whale subsistence hunt from increasing vessel traffic across the Chukchi and Beaufort Seas, as well as increasing barge traffic in and out of West Dock.
- EFF 12 The issue of invasive plants moving downstream on the Middle Fork Koyukuk River and into park lands is of concern. The likelihood of further spread of invasives within Gates of the Arctic will increase with additional construction in the pipeline corridor, and should be addressed in the SEIS.

## EFF

### Effects of the Proposed Project/ Analysis of Effects

*Comments on the potential effects of the proposed project, analysis of effects (including direct, indirect and cumulative) or the methodology developed to analyze the alternatives.*

- EFF 13      What is the difference in impacts from an aboveground versus buried
- EFF 14      Fairbanks is the only non-attainment area for PM 2.5 in the state of Alaska. The Municipal Gas Utility expansion area where a lateral line would be able to serve at a much reduced cost per MCF, which is the critical point in having customers convert to get rid of and stop competing with the high cost of energy that we have to be able to offer low cost energy and not have to burn wood and coal.
- EFF 15      Fairbanks is the only non-attainment area for PM 2.5 in the state of Alaska and EPA is not here to hear our scoping comments and the issues that are quite relevant. This is the area is within the Municipal Gas Utility expansion area where a lateral line would be able to serve the community at a much reduced cost per MCF. The would reduce energy costs and the reliance on wood and coal. It is concerning that EPA did not attend the scoping meeting to discuss these issues.
- EFF 16      Construction camps may impact moose hunting and subsistence activities near Wiseman.
- EFF 17      Tampons should be used on vehicles servicing the proposed pipeline to make sure oil does not drip on the roads. The oil could impact vegetation and caribou.
- EFF 18      Noise levels in the project area should be quantified. The threshold levels of noise impacts should be described and the effects of blasting to human health, birds and wildlife should be evaluated
- EFF 19      Evaluate surface disturbance activities to permafrost and vegetation resulting from the removal of vegetation, the placement of gravel for permanent and temporary access roads, pads, work areas, airstrips, facilities, etc.
- EFF 20      Evaluate the proposed project impacts along with other past, present, and reasonably foreseeable future projects and actions, and considering their cumulative impacts in their entirety
- EFF 21      Identify the geographic scope and timeframe for the CEA
- EFF 22      Describe the CEA methodology and explain any assumptions and models used in the analysis

## **EFF**

### **Effects of the Proposed Project/ Analysis of Effects**

*Comments on the potential effects of the proposed project, analysis of effects (including direct, indirect and cumulative) or the methodology developed to analyze the alternatives.*

- EFF 23 Identify the current condition of the resource as a measure of past impacts. For example, the percentage of species habitat lost to date
- EFF 24 Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resources is improving, declining, or in stasis
- EFF 25 Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends
- EFF 26 Assess the cumulative impacts contribution of the proposed alternatives to the long-term health of the resource, and provide a specific measure for the projected impact from the proposed alternatives
- EFF 27 Identify opportunities to avoid and minimize impacts, including working with other federal and state agencies, corporations, and native governments and communities
- EFF 28 The effect of equipment and vehicles and stored construction material throughout the pipeline corridor on the land and organic wildlife needs further examination and analysis. The total weight of the equipment, vehicles and other construction material, including snow/ice pads and roads would compact and potentially impact subsurface vegetation and drainage. What would be the extent of the impact caused by the weight of the equipment and vehicles on the surface and subsurface layers, the insulating properties of surficial materials and depth of the active layers? And what would be the impact on the concentration of water in these areas and effect on thawing of ice and permafrost, and the overall thermal balance along the pipeline corridor?

## ENG

### Engineering / Project Design

*Comments discussing project engineering, project design (including gas composition) and proposed changes.*

- ENG 1      What is the temperature of the gas that will be coming down the pipeline?
- ENG 2      Potential measures to repair erosion and backfill settlement, particularly during summer in areas where ice/snow pads were used, need to be developed and discussed. Ditching through stream banks, especially in unstable, ice-rich soils, may cause physical and thermal degradation, causing loss of riparian habitat, drainage of wetland complexes, potential changes in stream morphology, and increased sedimentation, with a resultant loss of aquatic habitat.
- ENG 3      Ditch Stabilization: Measures should be described regarding how the ditch will be stabilized and rehabilitated, particularly in areas on the Arctic Coastal Plain where the alignment deviates from the TAPS or Dalton Highway rights-of-way and access to the ditch may be seasonal.
- ENG 4      The plan view of the Access Road Typical Arch Section depicts the culvert installation significantly narrower than the bankfull width. Bankfull width should be used for sizing the culvert width in these types of installation.
- ENG 5      Consideration should be given to relocating the block valve at the end of this 2.3 mile gravel access road to AR-N-23.43, thereby eliminating a stream crossing and 2.3 miles of gravel road. There are many instances along the proposed alignment where moving a block valve location a few tenths to a couple of miles would greatly reduce the length of the associated access road and associated wetland impacts and gravel requirements.
- ENG 6      The plan view of the Access Road Typical Bridge Section depicts the bridge installation narrower than the bankfull width. Bankfull width should be used for sizing the bridge width in these types of installation.

## ENG

### Engineering / Project Design

*Comments discussing project engineering, project design (including gas composition) and proposed changes.*

ENG 7

The report identifies two highway bridges on which the pipeline will be attached. Consider the following comments regarding bridges.1. The utility support structure hangs below the bottom flange of the bridge. This would not normally be permitted.2. It appears as though the proposed pipe truss structure is formed from circular tubes (PDF page 3 of 4) and this is unusual and difficult to fabricate. Rectangular tubes are more common and rolled shapes are even more common, less expensive and easier to fabricate.3. It appears as though the intention is for the utility trusses to be supported only at their ends on the existing piers. Considering the complexity of working under the existing bridge, I wonder if building new piers for the truss would be more cost effective. In any event, the added weight to the piers would need to be examined.4. The plans indicate that the existing bridge's lateral bracing would need to be relocated. This could be complicated. 5. The first page of the plans shows the middle span to be 150-ft but it is 250-ft.6. The trusses appear to be deep enough and accessible enough to be considered attractive nuisances – that is, thrill seekers may be tempted to climb the structure.7. It is not clear how the pipe will pass through/under/around the existing bridge abutments.8. I suspect that the construction of the trusses (centered below the existing bridge) is anticipated to occur using equipment located on the bridge. The existing bridge would need to be analyzed for the proposed construction operations.9. The pier supports are supported on deep foundations. The proposed abutments are supported on shallow foundations. Differential settlement of the abutments and adjacent piers should be considered. No information for the Moody Bridge crossing of the Nenana River was included in the permit application. Will this be included? Attachment of utilities to bridges will follow 17 AAC 15.231. Prior to permitting attachment to bridge, ADOT will want to see that other alternatives such as HDD or a separate structure has been considered and the rationale for eliminating those alternatives.

ENG 8

Per 17 AAC 15.231(d), where required by special provisions in the utility permit, pipelines carrying flammable, corrosive, or other hazardous materials must be encased and have sufficient venting. The facility must be provided with automatic shut-off valves or other safety devices at or near the end of the structure (Bridge) as specified in the special provisions of the permit.

ENG 9

The Department of Transportation foresees a need to construct a permanent maintenance facility at Franklin Bluffs to provide optimum distance between existing stations, facilitate grading, and snow plowing and other maintenance operations. This will also benefit gas line construction. ADOT is pursuing this effort through the legislature.

## ENG Engineering / Project Design

*Comments discussing project engineering, project design (including gas composition) and proposed changes.*

- ENG 10 Text in paragraph three describes how the pipeline will be operated in permafrost terrain and thawed settings without creating problems, but does not address with any specificity the engineering controls that will be used. A brief description or citation to other documents (such as the explanation on page 23) would suffice.
- ENG 11 Fuel, oils, and antifreeze are slated to be stored in a compacted, soil-lined, and soil bermed containment area. A synthetically-lined containment area would provide greater protection to ground and surface water and would allow easier cleanup if a spill occurs or during demobilization.
- ENG 12 ASAP needs to discuss in the DEIS resource reports the deltas/differences (impacts) of the environmental and safety effects from designing, constructing and operating a pipeline using strain based design (SBD) with special permit conditions versus typical 49 CFR Part 192 requirements.
- ENG 13 The material site proposed around PLMP 641 is near a State land sales subdivision and should be relocated closer to the highway for ease of transportation.
- ENG 14 As much of the proposed pipeline route as possible should be located within or adjacent to the State of Alaska, Department of Transportation, Parks Highway right-of-way, and to the extent feasible, be constructed underground to minimize potential negative impacts to the scenic qualities of the South Denali area. Much of the Parks Highway in this area has been designated as a National Scenic Byway, which should be considered during route planning, design, and construction of the pipeline. The Port MacKenzie industrial area is available for locating processing and exporting facilities related to the gas line and may be considered for your future facilities.
- ENG 15 Using HDD on the slope south of the Grand Denali Hotel is a good approach. The potential use of the existing intertie utility and HDD would mitigate potential scars to the hillsides in this area.
- ENG 16 When will the final design be completed?
- ENG 17 What is the reason for changing the diameter of the pipe from 24 to 36 inches?
- ENG 18 It is extremely important that the State include in the proposed project, off-takes in Nenana, Healy, McKinley Village, Clear, Cantwell, and all communities along the route. The gasline is not worth the effort unless the communities along the way can benefit from it.

## ENG Engineering / Project Design

*Comments discussing project engineering, project design (including gas composition) and proposed changes.*

- ENG 19 Near MP 703 where it crosses the Deshka Landing Road to the south, consider moving the alignment due south and leave it on State land instead of crossing private property. Revision 5 went across the north end of my property. Now Revision 6 goes across the south end.
- ENG 20 What was the previous composition of the gas? What are the differences in the gas to be transmitted?
- ENG 21 You mentioned some of the major crossings there would be directional drilling involved. Are crossings of all the major waterways then going to be subsurface?
- ENG 22 Is there potential to do horizontal directional drilling through the Brooks Range because passing over Atigun Pass is expensive? This was the most expensive area for the Trans-Alaska Pipeline to go through.
- ENG 23 Horizontal Directional Drilling (HDD) should be used on the slope between the Grand Denali Hotel and Lynx Creek and we anticipate that it can be engineered and be made cost effective because it would eliminate a very serious scar on the landscape for Denali area visitors and residents.
- ENG 24 Is exporting the gas as a liquid feasible as part of this project?
- ENG 25 What are the biggest challenges related to changes in this alternative?
- ENG 26 How are you going to engineer for fault lines?
- ENG 27 Please provide a list of rivers and streams where Horizontal Direction Drilling (HDD) will be used and where a bridge will be needed.
- ENG 28 How long is the section that would be above ground in the pigging and valve areas? How much of it is above ground at a valve area?
- ENG 29 Are there engineering reasons not to go down the Parks in that region, i.e., Denali National Park and Preserve or vicinity?
- ENG 30 How will engineering design address fault crossings?
- ENG 31 Is it possible to put some kind of valve or device for an off-take after the pipe is built or does that have to be part of the design in initial construction? The lateral line to Fairbanks is 12 inches, correct?

## ENG

### Engineering / Project Design

*Comments discussing project engineering, project design (including gas composition) and proposed changes.*

- ENG 32 Will the SEIS address current issues surrounding solifluction occurring near the TransAlaska Pipeline System along the Dalton Hwy and the potential for that to occur with this pipeline?
- ENG 33 What steps are being taken to resolve issues such as solifluction similar to that occurring near the TAPS pipeline?
- ENG 34 Why are there plans and drilling test sites for new gravel pits, why not just use existing pits along the Dalton Highway Some are only a couple miles from existing pits.
- ENG 35 What is the role of West Dock in the ASAP route and will pipelines be built over the Beaufort Sea?
- ENG 36 What is the timing and staging of construction? How deep and where the pipeline will be buried?
- ENG 37 What is the proposed barge schedule for transporting modules?
- ENG 38 Why are we outsourcing the modules to Korea and not Louisiana or use Nikiski plants?
- ENG 39 Describe how drilling muds and cuttings, fluid additives, etc. would be managed, stored, transported, and properly disposed of
- ENG 40 Describe the types of drilling fluid additives that would be used and their potential impacts on the aquatic environment
- ENG 41 Describe potential environmental impacts, proposed mitigation measures, monitoring procedures and contingency planning for accidental releases of drilling fluids, muds and cuttings during HDD construction activities
- ENG 42 Describe the location of water sources, volume of water, and withdrawal rates that would be required for hydrostatic testing of the natural gas pipeline
- ENG 43 For winter hydrostatic testing, identify the use of any chemical additives, such as anti-freeze or freeze depressants, and how these chemicals would be treated prior to discharging
- ENG 44 Describe mitigation measures/commitment and control devices that would be implemented to minimize environmental impacts associated with discharging hydrostatic test water

## ENG

### Engineering / Project Design

*Comments discussing project engineering, project design (including gas composition) and proposed changes.*

- ENG 45 Estimate the total volume (cubic yards) of gravel material that would be required for construction of this project, including the GCF, access roads, natural gas pipeline, port facilities, airplane runway, camp, etc.
- ENG 46 Identify the location of any existing and proposed new material source sites on an aerial map with the acreage included.
- ENG 47 Provide the decision criteria for how prospective material extraction sites are selected, and whether there were any consideration to avoid and minimize wetland impacts. For example, proposing a material site in the meanders and oxbows of the Tolovana River should be avoided
- ENG 48 Summarize in a table the information regarding each material source site, such as the location, surface area impacts, quantity of material available, land ownership, permit status, etc.
- ENG 49 In the project area, identify the location of proposed blasting, and describe the blasting methods that would be used. Describe what types of explosives would be used and how they would be properly transported, managed and stored. Specify how blasting effects, such as noise, and wildlife displacement would be controlled and mitigated. A table with this summary information and a map identifying the blasting locations should be provided in the Supplemental EIS.
- ENG 50 Conduct a seismic hazard study for the project area
- ENG 51 Identify the seismically active areas, geological faults, tectonic activity, etc. in the project area. Include this information on a map
- ENG 52 Describe the potential risks associated with seismic activities and the effects to project related facilities and structures
- ENG 53 Appropriate seismic design and construction standards and practices should be implemented for all proposed facilities
- ENG 54 Describe how the seismically active areas will be monitored and managed to respond to structural failures of facilities
- ENG 55 To the extent that engineering can be done for the EIS, what site specific engineering can be made available to determine how waterbodies, streams and rivers will be crossed and impacts on erosion and water quality be determined?

## FISH

### Fish

*Comments regarding fish and fish habitat.*

- FISH 1 Many streams to be crossed between ST\_580.6 and ST\_724.6 are cataloged for spawning of one or more salmon species and are proposed for open cut or isolated open cut crossing methods. Open cut and isolated open cut crossing methods should be implemented in spawning reaches only within the May 15 to July 15 in-water work timing window. Outside of this timing window (when spawning fish or incubating eggs are present) stream crossings should use HDD methods. Spawning reaches in this section that are proposed for open cut installations include crossings at 580.6, 583.8, 595.2, 611.7, 627.7, 643.6, 656.2, 658.2, 658.9, 661.1, 677.8, 684.2, 686.2, 696.1.
- FISH 2 The Fish Habitat Permit purpose/criteria should be expanded to state that for both resident and anadromous fish streams a fish way shall be kept open, unobstructed, and supplied with sufficient water to allow the free passage of fish, if considered necessary by the ADF&G (AS 16.05.841).
- FISH 3\* On page 5 of the Final Section 810 Evaluation it state "during pipeline operations, ice dams could occur during winter if the buried pipe temperature is colder than ambient temperature." An effort should be taken to ensure that the cold gas in the pipeline does not affect or harm fin-fish. A suggestion in the 810 Evaluation is to "maintain the temperature of the pipeline to the surrounding ambient temperature as much as practical." We agree that this should be done to protect fin-fish.
- FISH 4\* There should not be summer construction at the Chuitna and Nenana Rivers, being anadromous streams. And there are two forks of the Chuitna and several areas of the Nenana on their chart.
- FISH 5\* All efforts should be made to prevent impacts to anadromous streams, both the temporary, and much more important are the long-term impacts. And that should be done to the utmost degree of scientific understanding. If it can't be done, then a bridge should be put over. It shouldn't be, "Oh, well, the fish or the gas." There is an alternative, and it's called a bridge. We can't keep whacking out our salmon streams one by one and expect to have salmon in 100 years. That's one of our long-term resources that hopefully we're going to have for thousands of years. So, this plan has the potential for protecting the salmon streams, and I encourage that at the highest level.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## HAZ

### **Hazardous Material**

*Comments regarding potential risks related to hazardous materials or handling of hazardous materials associated with the proposed project.*

- HAZ 1 Identify the sources, types, and volumes of hazardous and solid waste material generated
- HAZ 2 Discuss how the hazardous and solid waste material would be properly handled, stored, and disposed at the camps, construction sites, or at any offsite facility
- HAZ 3 For clean solid waste material, develop and implement a recycling and/or composting program. Consider backhauling recyclable materials offsite
- HAZ 4 For hazardous waste materials, identify any facilities where the material would be properly disposed. The facility should be approved and certified to accept hazardous waste material
- HAZ 5 As an alternative to disposing of hazardous waste, an onsite underground injection control (UIC) well should be considered to handle hazardous waste material disposal. The Supplemental EIS should evaluate this alternative
- HAZ 6 Identify any known hazardous material sites within the adjacent project area and determine the potential cumulative impacts from the proposed project
- HAZ 7 Identify the locations and areas of any known hazardous contaminated material sites within the adjacent project area
- HAZ 8 Route the proposed pipelines to avoid known contaminated areas to minimize potential liability and to avoid negatively impacting the remedy that is in place for the CERCLA site
- HAZ 9 Include a commitment in the Supplemental EIS to develop a Soil Handling Plan to address contaminated soils if encountered during pipeline construction

## HIA

### Health Impacts

*Comments related to health impact assessment in the NEPA process or concern about health impacts.*

- HIA 1 Identify human health exposure pathways related to environmental impacts and subsistence resource
- HIA 2 When conducting a screening, refer to the “Standard for the Screening Stage” from the North American HIA Practice Standards Working Group document “Minimum Elements and Practice Standards for Health Impact Assessment (November 2010, Version 2). R. Bhatia et al. Minimum Elements and Practice Standards for Health Impact Assessment, Version 2 (North American HIA Practice Standards Working Group, 2010), 3 – 4.
- HIA 3 Evaluate effective mitigation measures to minimize adverse impacts to human health
- HIA 4 Determine which health impacts to evaluate in the Supplemental EIS based on the screening analysis
- HIA 5 Identify and discuss the methods and process for developing the HIA analysis and the sources of information. Discuss how local communities and tribes would be involved
- HIA 6 Include a work plan and schedule for completing the health assessment
- HIA 7 Include a profile of existing health conditions of the region and identify the sources of this information
- HIA 8 Evaluate the potential health impacts of individuals and communities in the region
- HIA 9 Include the HIA as an appendix in the Final Supplemental EIS
- HIA 10 Identify strategies to manage identified adverse health impacts
- HIA 11 Involve communities and tribal governments in developing health strategies and mitigation measures. Prepare a plan to monitor the health of individuals and the community during construction, operations and closure/reclamation
- HIA 12 Communicate the findings of the HIA to the tribes, communities, and the public
- HIA 13 Address potential direct, indirect, and cumulative impacts of the proposed project on children’s health, including consideration of prenatal exposures

## **HIA**

### **Health Impacts**

*Comments related to health impact assessment in the NEPA process or concern about health impacts.*

- HIA 14      Assess children's potential exposures, pathways, and susceptibilities to the pollutants of concern
- HIA 15      Identify pollutants of concern and their sources that represent health and safety risks to children
- HIA 16      Conduct an exposure assessment for children – air, water, subsistence foods, noise, etc.
- HIA 17      Identify the children's baseline health conditions

## **INA Inadequate Information to Assess Effects/Unclear Information**

*Comments stating the information provided in the analysis of the alternatives and the potential effects of research is inadequate, inaccurate or confusing.*

- INA 1 On page 114 of the Plan of Development the mitigation section states that both preconstruction and construction activities would “Avoid areas with tourist and public recreation facilities”. The Willow Winter Carnival uses the Area for a dog sled race. Many dog mushers, trappers, skiers and snowmobile travelers use the Area all winter long.
- INA 2 General soils information was not included for the Alaska Range (Healy, Broad Pass, Talkeetna area).
- INA 3 Specific comments on the Plan of Development. This section states pipe and other material will be transported via rail to a “pipe coating and double-jointing facility located in Fairbanks.” Is this facility the same as the Marshaling Yard? Same comments for this facility as those for 2.1.10. Section 7.2.4 states, “Coated and double-jointed mainline pipe will arrive in Seward, where it will be offloaded and stored at larger marshalling yards or rail yards.” If pipe arrives “coated and double-jointed”, what is the Fairbanks facility to be used for? Will any coating or double-jointing be done in Fairbanks?
- INA 4 The report states airports listed for possible use may need upgrades and improvements. This needs to be further clarified and quantified. What needs to be done, at what airports and at what cost? ADOT doesn’t maintain the Galbraith and Prospect Creek Airports. We have an agreement with Alyeska-who maintains those particular strips. Also, lease space may be limited for staging materials and other operations at several of the airports listed. Once the ASAP project has better understanding of the specific operations at each individual airport, they should consult with ADOT Airport Leasing to see if leasing space is available.
- INA 5 Section 7.8 [Special Design Areas] of the Plan of Development is short on detail. It is assumed both locations will require locating the pipeline longitudinally within the highway right of way. This will be challenging at both locations and we look forward to being provided additional detail.
- INA 6 It is not clear if the proposed route down Willow Creek Parkway is on the north or south side of the road.
- INA 7 The change in route from the AK railroad grade into Fairbanks to the route over the top of Murphy Dome Road and through subdivisions is problematic and impacts not understood.

## **INA Inadequate Information to Assess Effects/Unclear Information**

*Comments stating the information provided in the analysis of the alternatives and the potential effects of research is inadequate, inaccurate or confusing.*

INA 8 The SEIS should clarify whether the 117 acres for the GCF includes the acreages for the two auxiliary pads

INA 9\* Ahtna is disappointed in the lack of information of the Ahtna history and culture within the Cultural Resource Interior region section 5.13.2.2. The sections titled Tiaga Period and European and Euro-American Contact and Early Exploration in particular could be expanded on. The Western Ahtna people have used the area close to the proposed project area for centuries. The Copper Basin Ahtna tribes have a history of travel to and use of areas near the proposed project area. These tribes continue their Customary and Traditional subsistence use of these areas. While the sections on the North Slope and South Central Alaska are very well documented we feel the information on Interior Athabascans is lacking. Consultation with NPS archeology department could supply the authors with details.

INA 10\* Your map that you gave us shows it coming right across to Point MacKenzie. So now you're saying it's going to go to Beluga or both? You're saying it's going to T down there, and MacKenzie and Beluga are a ways away, but I'll take your word for it. Hopefully, a better map will come out.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## LNG

### LNG pipeline

*Comments comparing ASAP to the LNG pipeline project.*

- LNG 1      There is confusion in the community between the ASAP and LNG projects. Is the LNG and the ASAP going to use the same right-of-way or is it an either/or situation? What's the relationship as both of them kind of move forward and parallel? What will the lifespan of these projects be? This project is similar to the LNG project but is the LNG project going to have a completely different alignment?
- LNG 2      There are two pipeline projects being discussed and there is also natural gas being trucked down the Haul Road. What is the relationship of trucking to these two pipelines?
- LNG 3      There are key differences between the LNG and ASAP projects due to the gas composition and proposed processing plants. The ASAP project would provide communities the ability to tap right into the pipeline? The SEIS should explain the differences between these projects.
- LNG 4      Will both this project and Alaska LNG move forward or is it going to end up being one or the other? When will the decision be made? Is there any opportunity for them to work together?
- LNG 5      The Alaska LNG project is so uncertain that it is important that this project continue to progress.
- LNG 6      Why are we building two pipelines? Rather than routing two to Valdez, run one to the Nome port.
- LNG 7      How would a road to Nome affect plans for a pipeline from Prudhoe Bay?
- LNG 8      Consistent with NEPA, the Corps should consider integrating the planning and environmental review procedures for both the ASAP and the Alaska LNG Projects so that both projects run concurrently, rather than consecutively
- LNG 9      Develop a single comprehensive EIS to evaluate the environmental effects of both natural gas pipeline projects.
- LNG 10     Identify and evaluate past and present natural gas pipeline projects and distributions systems, such as trucking LNG from south central to Fairbanks, existing mine developments, etc.

## LNG

### **LNG pipeline**

*Comments comparing ASAP to the LNG pipeline project.*

LNG 11

Evaluate the proposed future resource development projects, such as the Alaska LNG Project, the Fairbanks natural gas distribution project and proposed liquefaction facility on the North Slope, trucking LNG from the North Slope to Fairbanks, Susitna-Watana hydroelectric project, the Donlin Gold Mine Project and other proposed mining projects

## MIT

### Mitigation / Monitoring

*Comments related to mitigation and monitoring associated with the proposed project.*

- MIT 1 Identify mitigation measures to minimize impacts to permafrost and vegetation resulting from the construction and operation of this project
- MIT 2 Identify mitigation measures/commitments to minimize impacts from seismic activities
- MIT 3 Provide mitigation measures to minimize impacts to public lands and ensure consistency with land use plan requirements
- MIT 4 Provide a commitment to develop and implement a reclamation, revegetation, and rehabilitation plan. Identify specific project areas and activities that would require reclamation, revegetation, and rehabilitation. Describe different options for reclaimed, revegetated, and rehabilitated. Discuss monitoring efforts to ensure success of the reclamation, revegetation, and rehabilitation activities.
- MIT 5 Conduct an invasive non-indigenous plant study (pre- and post- project construction)
- MIT 6 Identify mitigation and control measures to minimize the establishment of noxious invasive plant species. Conduct monitoring activities during and after project construction to ensure that non-native invasive species are not establishing in the area. Utilize native plants and grasses for restoration and reclamation of disturbed areas post project construction.
- MIT 7 Develop mitigation and monitoring plans to avoid and minimize impacts to protected species
- MIT 8 Federal actions should promote the recovery of declining populations of species and protection of their habitat. Mitigation measures should be described to avoid and minimize adverse impacts to protected species
- MIT 9 Discuss options for minimizing project related emissions, including consideration of mitigation measures and reasonable alternatives
- MIT 10 Develop a project mitigation plan for each the project lifecycle (e.g. pre-construction, construction, operations, and maintenance) to assess mitigation needs, identify mitigation measures/commitments, best management practices, etc., and evaluate their effectiveness. Involve the tribes and the public in mitigation planning, and monitoring. Ensure mitigation measures/commitments are implemented and documented.

## MIT

### Mitigation / Monitoring

*Comments related to mitigation and monitoring associated with the proposed project.*

- MIT 11 Provide estimates of the timeframes for each mitigation measure to ensure a start date and duration for implementation. This would avoid and minimize impacts associated with tribal subsistence activities
- MIT 12 Evaluate whether proposed project mitigation measures would result in additional environmental impacts. Describe any corrective actions that would remedy failed mitigation or ineffective mitigation measures.
- MIT 13 Develop an overall monitoring strategy for the project - define the goals and objectives of monitoring, provide summary information on monitoring (including a list of measurement parameters, methods, locations, and frequency, etc.) data analysis, and reporting. Specify terms of measurable performance standards or expected outcomes to establish clear performance expectations. Identify who is responsible for mitigation implementation and monitoring – lead agency, cooperating agency, project proponent, and third party.
- MIT 14 Develop an adaptive management and contingency strategy to respond to an unforeseen and unexpected worst case scenario. This plan should be discussed in the Supplemental EIS
- MIT 15 Identify project situations and scenarios where additional corrective actions and response activities would be necessary, such as a pipeline or GCF explosion
- MIT 16 In addressing potential adverse impacts, measures for avoidance or minimization of those impacts should be considered before resorting to mitigation measures. Where avoidance or minimization is not possible, develop appropriate mitigation measures and agreements. These should be developed with input from the affected population in a consensus-based process. Agreements should be developed between the project proponent and the EJ communities

MIT

## Mitigation / Monitoring

*Comments related to mitigation and monitoring associated with the proposed project.*

MIT 17\*

In their mitigation measures, in Appendix H, under Fisheries, age 5, I am opposed to the language using the words, the phrase, "to the maximum extent practicable." They use that -- it talks about maintaining, to the maximum extent practicable, existing temperature regimes, and, also, with hydrologic regimes, and I don't think that's acceptable. It should say, "to the maximum extent possible," because what they think may be practicable and what the fisheries biologists say is possible are two different things. We've learned from other projects that even minimal changes in water temperatures can affect their spawning. And that's another reason why I'm against the summer construction through anadromous streams. And then, again, under their operational -- or their project descriptions -- it is in Section 2 -- they talk about their mitigation measures will be implemented to minimize the impacts, including the fuel storage, equipment refueling and maintenance operation will be at least 100 feet from waterbodies and wetlands. However, when you get down to their mitigation appendix and their mitigation measures, again, a little farther down -- I think it's still on page 5 -- it says: Material storage and refueling activities will be more 100 feet from the anadromous streams to the maximum extent practicable. And that language should be changed to "possible." Because what they're saying in their operational plan is not what they're saying in their mitigation plan.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## **MOD Modules and Barges**

*Comments related to barging and offloading Gas Conditioning Facility Modules at West Dock.*

- MOD 1 Scheduling the timing of construction and offloading activities from barges at West Dock to mitigate potential impacts to fish is suggested.
- MOD 2 According to the Plan of Development, module offloads are planned to occur during summer, between the spring and fall migrations, and are not expected to affect migrating bowhead whales or subsistence activities. However, the Plan of Development does not specifically state when offloading will begin or will be complete.
- MOD 3 What are the operational plans regarding ocean vessels, timing of operations, barge loading and unloading?
- MOD 4 Evaluate marine dredging methods and options (summer and winter) and disposal sites – offshore, nearshore, upland, open water, and beneficial uses of the dredged material
- MOD 5 Develop a sealift plan, sampling and analysis plan, and marine dredging and disposal plan for evaluation in the Supplemental EIS
- MOD 6 Evaluate potential environmental impacts associated with the increase in marine barge traffic on marine mammals, threatened and endangered species, and subsistence resources
- MOD 7 Identify the marine barge classes, timing and frequency of travel, volume handled, and marine transportation routes to address potential environmental impacts
- MOD 8 Identify the seasonal migration routes and timing of marine mammals, threatened and endangered species, and subsistence resource harvesting along the marine navigation routes and evaluate any potential conflicts between barge traffic and marine resources and uses
- MOD 9 Identify mitigation measures to minimize impacts to marine resources and monitoring efforts to ensure that marine resources are protected
- MOD 10 Include a commitment to use marine barges that operate with a ballast water management plan
- MOD 11 Include a commitment to use marine barges that have onboard ballast water treatment systems to prevent introduction of invasive species

## **NEPA National Environmental Policy Act**

*Comments regarding the NEPA and SEIS process*

- NEPA 1 The POD indicates the Yukon River crossing is currently HDD. The SEIS will need to define the preferred option including consideration of alternatives such as a new overhead structure that can accommodate vehicle traffic. With respect to utilizing the Yukon River Bridge, the SEIS should consider and assess the risks associated with having two major pipelines installed on the same bridge. This should include monetary risks to the State, and potential ramifications to the oil and gas supply beyond Alaska.
- NEPA 2 The Parks Highway route of the pipeline will likely pass through the Trapper Creek, Susitna, Willow, Big Lake and Point MacKenzie Community Councils, as well as the City of Houston. These communities each have a comprehensive plan which should be consulted during the evaluation of pipeline routes.
- NEPA 3 Can you clarify what you mean by looking at only the changes and their impacts from the 2012 FEIS to the current design? What about issues that were not satisfactorily resolved in the previous 2012 EIS?
- NEPA 4 How much can the line shift before you have to start doing a new assessment of the proposed design?
- NEPA 5 Will be a delay in the NEPA process to get these comments into the final report?
- NEPA 6 Finally, the Corps should include a requirement in the SDEIS that barge operators submit to the AEWG and the North Slope Borough Department of Wildlife Management all marine mammal sightings data.
- NEPA 7 The Denali National Park Improvement Act of 2013 authorizes the Secretary to issue right-of-way permits for a high-pressure natural gas transmission pipeline in non-wilderness areas within the boundary of DENA within, along, or near the approximately 7-mile segment of the George Parks Highway that runs through the Park. This changes the discussion on this topic in the SEIS and needs to be addressed.
- NEPA 8 The SEIS should clarify the desirability and practicability of trenching in the pipeline route adjacent to the Intertie corridor between Montana Creek and Carlo Creek in the preferred alternative.
- NEPA 9 The ASAP SEIS should consider the Denali National Park Improvement Act in the analysis of the alternatives.

## **NEPA National Environmental Policy Act**

*Comments regarding the NEPA and SEIS process*

- NEPA 10 The Supplemental EIS should reflect not only the project proponent's and the Corps' purpose and need, but also the broader public interest and need based on the scoping comments. The purpose and need statement for the Supplemental EIS should be developed in coordination with the cooperating agencies
- NEPA 11 Compare environmental impacts between the proposed project and alternatives analyzed in detail
- NEPA 12 Conduct a concurrent review and analysis under the NEPA, CWA §404, and Section 106 National Historic Preservation Act (NHPA)
- NEPA 13 The Least Environmentally Damaging Practicable Alternative (LEDPA) should be identified as the preferred alternative in the Draft Supplemental EIS
- NEPA 14 Characterize the marine benthic environment and organisms, sediment composition, etc.
- NEPA 15 Encourage meaningful engagement and participation by the community
- NEPA 16 EJ analysis should be conducted in consultation and coordination with communities
- NEPA 17 Prepare and disseminate fact sheets on technical aspects of the project
- NEPA 18 Include in the Supplemental EIS a summary conclusion or an EJ determination which concisely expresses whether impacts have been appropriately avoided, minimized and/or mitigated
- NEPA 19 Complete screening analysis to determine which aspects of human health (including, but not limited to public, environmental, mental, social, cultural health, etc.) could be impacted
- NEPA 20 Partner directly with a local, state, tribal, and/or federal health officials to conduct the appropriate analysis
- NEPA 21 Identify the different land use plans under Federal, State, and local jurisdiction and describe how the proposed mainline and lateral pipelines and aboveground facilities would comply with these land management plans.

## **NEPA National Environmental Policy Act**

*Comments regarding the NEPA and SEIS process*

- NEPA 22 It is important that locations where strain based design permit applications will be submitted to PHMSA that this be coordinated with the EIS process so that appropriate mitigations are considered during the EIS process.
- NEPA 23 The Knik tribe seeks to be provided an appropriate level of authority as a tribal government agency to ensure ecological and natural resource information is used to review siting and construction of the pipeline in order to avoid or minimize habitat impacts.
- NEPA 24\* The FEIS was written by United States (US) Army Corp of Engineers (US ACE) in cooperation with the US Coast Guard, US Department of the Interior, Bureau of Land Management (BLM) and National Park Service (NPS), US Department of Transportation, Pipeline and Hazardous Materials Administration, and the US Environmental Protection Agency. Executive Order 13175 states that "each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications."
- NEPA 25\* On the USACE website within Tribal Policy Principles under Pre-Decision Consultation it states "the USACE will involve Tribes collaboratively before and throughout decision making, to ensure timely exchange of information, the consideration of disparate viewpoints, and the utilization of fair and impartial dispute resolution processes."
- NEPA 26\* A letter was sent on October 19, 2009 to the President of the Native Village of Cantwell, Tammy Straughn. Our records indicate that Tammy Straughn vacated her Presidency on October 6, 2008. Consulting BLM 8120-Tribal Consultation under Cultural Resource Authorities, Relationship to Tribal Governments; Alaska Native Tribes it states that "an up to date tribal listing can be obtained from the designated Native Liaison in the Alaska State Office or a Field Office, or from the headquarters office of the Bureau of Indian Affairs."

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.

## **NEPA National Environmental Policy Act**

*Comments regarding the NEPA and SEIS process*

- NEPA 27\* Ahtna is very disappointed in the Department of Defense policy of only sending a letter with a follow up call to fulfill their mandate. Ahtna Incorporated, and our associated Village Councils, enjoys an excellent relationship with the Glennallen BLM office and the NPS Wrangell Saint Elias office in regards to government to government consultation. We feel they give an extra effort to complete their mandate for government to government consultation. The NPS Memorandum on Government to Government Relations with Native American Tribal Governments states "Each executive department and agency shall consult, to the greatest extent practicable and to the extent permitted by law, with Tribal governments prior to taking actions that affect Federally recognized Tribal governments. All such consultations are to be open and candid so that all interested parties may evaluate for themselves the potential impact of relevant proposals."
- NEPA 28\* The Native Village of Cantwell (NVC) is a federally recognized Indian tribe. During the course of the ASAP DEIS planning process no involvement was requested from either NVC or Ahtna. Citation from Executive Order 13175 Sec. 2. Fundamental Principles. Citation from Executive Order 13175 Sec. 3. Policymaking Criteria. Citation from Executive Order 13175 Sec. 5. Consultation

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**NOTE**

**Notification of Meeting**

*Comments regarding notification issues.*

NOTE 1

How were meeting notices distributed?

NOTE 2

More public notification about this project is needed, use different forms of media, such as email notifications. Consider more outreach to adjacent property owners.

## **PER Permits**

### *Comments on permits and the permitting process*

- PER 1 ADF&G permits are required for activities within resident fish streams that may restrict or prohibit fish passage through the project area. Excessive harvest of fish by project workers may adversely affect fish populations in lakes or certain reaches of streams.
- PER 2 ADOT would be interested in acquiring rights and joint use of any new quality material sites that are developed along the Dalton and Parks highways.
- PER 3 A comprehensive utility permit will be required for locations where the pipeline will occupy the State ADOT right of way. New driveway approaches, road improvements, etc. needed for construction and maintenance of the gas line will also require permitting. Please refer to the attached table of required permits for more detail.
- PER 4 The sections describing “Stationary Construction Camps” should note that these will be subject to ADEC permitting requirements regarding drinking water, wastewater discharge and food service operations.
- PER 5 Certain aspects of construction fall under the Alaska Construction General Permit. Also discharge of hydrotest water that contains substances meant for freeze protection may fall under an APDES General Permit.
- PER 6 ASAP will need to describe the impact of implementing the strain based design special permit conditions versus not implementing them. Without the special permit conditions ASAP would need to install pipeline with: greater strength or wall thickness; or construct the pipeline above ground to be able to handle the soil and terrain stresses on the pipe.
- PER 7 If the USACE, the Alaska Gasline Development Corporation (ADGC), or consultants require access onto ARRC lands for conducting investigations associated with the SEIS, entry permits or other appropriate permits from ARRC will be needed. If the pipeline or associated facilities are proposed to be constructed and operated in ARRC's ROW or on other ARRC property, a long-term corridor contract or other permit would be required. Any long-term use of ARRC property with restrictions on permit termination would require approval by ARRC's Board of Directors.

## **PER Permits**

### *Comments on permits and the permitting process*

- PER 8 Portions of the gas line are located within a Special Flood Hazard Area (SFHA). Prior to actual development starting a MSB Flood Hazard Development Permit will be required for any of those areas located within a SFHA, per the requirements of MSB Chapter 17.29. Material sites will need to be operated in accordance with Borough code requirements (MSB Chapters 17.28 and 17.30). Any development within the Point MacKenzie Port Special Land Use District must comply with the requirements of MSB Chapter 17.23. The Borough has adopted Chapter 17.05- Essential Services which is for the purpose of providing public participation in the decision affecting the installation of essential service utilities in such a manner that they enhance the health, safety and general welfare of borough residents and properties while minimizing negative impacts. The ASAP has been conducting the NEPA process and is therefore, exempt from the requirements of MSB Chapter 17.05.
- PER 9 Have you received right-of-way access through Denali State Park? Do you know what the provisions would be if they did allow? Do you purchase land from them? Do you trade land? How does that work?
- PER 10 Will operational plans in the Beaufort Sea include agreements with the AEWG and NOAA as part of the Conflict Avoidance Agreement?
- PER 11 Integrate NEPA process with the Clean Water Act Section 404 permitting process, such as including a Draft 404(b)(1) analysis in the Draft EIS as an Appendix.
- PER 12\* When you talk about getting off the Trans-Alaska Pipeline route, that right-of-way, the TAPS right-of-way, is a multi-use permit. And whatever nonrenewables was supposed to be extracted from the north, or on its route, was supposed to take the Trans-Alaska Pipeline route, since it's a multi-use permit. And now with this new gas line proposal you're carrying, it violates the TAPS.

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## REC

### Recreation

*Comments regarding recreation concerns*

- REC 1 Locating a material extraction site or housing a 1,000 man camp next to the Willow Creek State Recreation area does not seem to be well thought out.
- REC 2 Proposed trail crossings would need to be included in any construction plans to ensure safe, year-around public recreational trail use. The alignment of the pipeline through Willow Creek State Recreation Area will adversely affect the heavily used trails that directly support the sport of Dog Mushing as well as many other outdoor activities, such as Snowmobiling, Snowshoeing, and Hiking. A route that least impacts the recreational activities that make living in Willow great, is the responsible thing to do. Willow Area Community Organization (WACO) opposes the proposed pipeline route through the Willow Creek State Recreation Area and West Gateway Trail System from mile 700 south. At MP 641 - The old gravel pit that is proposed to be a construction camp has been used as a parking area for people who obtained state land and have built cabins since the Parks Highway opened in the mid 1970's. It will be necessary during the construction of the pipeline to allow public parking at this site to continue. This parking and staging area is primarily used in the winter.
- REC 3 Since the proposed pipeline will impact DPOR managed lands totaling 40+ miles – please outline mitigation for impacts to seasonal and year round recreation for Denali State Park and Willow Creek State Recreation Area.
- REC 4 The footprint of the proposed pipeline, and associated pipeline activities, within Denali State Park and Willow Creek State Recreation Area should be minimized.
- REC 5 Consider developing and providing enhancements of recreation opportunities (i.e. trails, campgrounds, boat launches, land acquisitions, visitor services, etc.). Please consider existing trail management plans in for areas along the route such as the Matanuska-Susitna Borough Recreational Trails Plan.
- REC 6 Willow Dog Musers Association proposes that: Pipeline construction be implemented with the least impact to dedicated trails; If a trail or trails must be blocked an alternative trail must be brushed out and available; WDMA be notified when construction affects trails for fall and winter use; and proposed construction camp on Willow Creek Parkway be relocated as it straddles the Lucky Shot Trail or the trail be rerouted.
- REC 7 The proposed project conflicts with land use around this area passing through Willow Creek Recreation Area.

## REC

## Recreation

*Comments regarding recreation concerns*

- REC 8      Comment suggests alternative routes around the east side of Willow because the current route passes through the Willow Creek SRA, conflicts with the current effort of trail management/development, places a unplanned "trail" disrupting the current trail system, blocks the historic Lucky Shot trail, and has a material site that would block the Windsock Trail and the Shirley Lake trail.
- REC 9      The current route is inadequate because it goes through the Willow Creek State Recreation Area, conflicts with the current effort of trail management/development, the proposed man camp blocks the historic Lucky Shot trail, and has a material site that would block the Windsock Trail and the Shirley Lake trail. The corridor around the Nancy Lake State Recreation Area will cause inappropriate and unauthorized motorized access including trespassing.
- REC 10     The alignment, camps, material sources, and access points will cause a significant temporary and long term impacts to residential and recreational areas in Willow and nearby areas. These areas provide wideness, recreational, and fishing opportunities for many people. Routing a pipeline facility through or near portions of these recreation areas would negatively affect them.
- REC 11     The materials investigation site, adjacent to Mile 701, looks like it would be accessed from Crystal Lake Road, is adjacent to their southern property line. The materials site looks like it crosses Windsock Trail, which would disrupt recreational activities (snowmachining, dog sledding, cross country skiing). The material site slightly north of that location looks like it will impact fewer people as it is not located off of a paved road.
- REC 12     The pipeline alignment crosses Fairbanks North Star Borough land and public recreational trails within T1N R2W, T1N R3W, and T2N R3W. The trails are Old Murphy Dome Road Trail, Old Saulich Trail, Equinox Marathon Trail, and Sheep Creek Dredge Path Trail. These trail crossings would need to be included in any construction plans to ensure safe, year round public recreational trail use.
- REC 13     The pipeline route will disrupt recreational access to specific trails and areas around Denali State Park.
- REC 14     Construction camps will have impacts on moose hunting and subsistence activities near Wiseman.

## **RFI Request for Information**

*Comments requesting information including maps, presentations, or descriptions of locations.*

- RFI 1 Requests for information regarding procurement of marine transportation for the project.
- RFI 2 Please provide more detailed maps of the Willow area and provide a printed copy to the Talkeetna Library. The maps were difficult to find on the website.
- RFI 3 There is an access road from Parks Highway to the Railroad south of Healy. Why is this?
- RFI 4 Request for Willow's meeting power point to be sent by email to the commenter.
- RFI 5 Does the U.S. Department of Transportation Act of 1966 apply to this
- RFI 6 The Borough is requesting an active dialog during design and construction of the pipeline, to consider gas off-takes for Borough communities along the route since the line will now carry utility-grade natural gas, and expensive processing facilities will not be required at each take-off point.
- RFI 7 What are the next steps? How does this get funded and what's the timeline and the likelihood of funding under best case scenarios and worst case scenarios?
- RFI 8 How does eminent domain affect property potentially affected near Healy?
- RFI 9 Commenter asks about the purpose for a major access road that connects to the railroad south of Otto Lake north of the Windy Bridge. Is it for access or hauling pipe to the right of way?
- RFI 10 Request for a meeting to take place in Trapper Creek instead of only in Talkeetna.
- RFI 11 Is this presentation available in PDF that can be emailed?
- RFI 12 How would West Dock be modified to increase the pad size and widening the road for offloading barges?
- RFI 13 Which part of the route is the Supplemental EIS for? Where were the minor route changes made?
- RFI 14 What are the timelines of the two natural gas pipeline projects?

## **RFI**

### **Request for Information**

*Comments requesting information including maps, presentations, or descriptions of locations.*

- RFI 15      After all this NEPA process is done and then final issuance of the EIS by Army Corps of Engineers, how quick is the project going to be once the determination is done? What's the timeline?
- RFI 16      The North Slope Borough will be submitting comments. They wonder if there are particular things that would be most helpful in the scoping comment period.
- RFI 17      Request for Willow map milepost 615 - 727. Map was damaged that was originally sent to commenter.
- RFI 18      Request for maps with proposed sites on them [for Willow area].
- RFI 19      Request for the location of EIS documents
- RFI 20      Could USACE make the scoping presentation available to share with the community?

## **SPELL Spills (Oil Spills, Response or Planning)**

*Comments related to potential oil spills, spill response or planning.*

- SPILL 1 Identify and fully analyze the risks associated with potential fuel spills and other emergency response scenarios adjacent to water bodies, wetlands, and coastal areas within and adjacent to the project area
- SPILL 2 Evaluate the risks of fuel spills
- SPILL 3 Describe the proposed project fuel planning, transportation, storage and containment, and spill planning and response. Identify impacts to area users, as well as any strategies employed to communicate risks or actual emergencies to those users.
- SPILL 4 There needs to be a spill prevention and contingency plan for the POD. Tribes need to be included in the lists of contacts for spill response activities, particularly where tribal cultural resource site are affected.
- SPILL 5 49 CFR 192.5 defines four distinct classifications of pipeline in proximity to dwellings and buildings.  
Ninety-six percent of commercial and private residences along the route are within a Class I location, which requires a pipeline to be buried to a minimum of 30 inches of depth. A majority of the commercial and private residences along the Parks Highway right-of-way corridor are currently in close proximity to the Parks Highway right-of-way limit, which in most instances is 150 feet on both sides of the highway centerline. The proposed pipeline is planned to be off the running surface of the highway and remain within the highway right-of-way corridor. The distance between the highways running surface, the proposed pipeline route and commercial and private residences will be only several feet distance from pipeline to constant human activity. The ASAP-DEIS has identified a maximum spacing of block valves at 20-miles apart. During a rupture or release, the amount of liquids released would be equivalent to eight semi-trucks worth of propane or 73,300 gallons. The response time has never been addressed however, the response time could take several hours up to days to identify, locate and repair damages depending on type of leak, location and weather conditions. The potential leak or rupture would damage water sources, vegetation, wildlife and humans for many years afterwards.  
Since the terrorist attack of September 11, 2011 terrorism has become a safety and security concern for energy facilities and distribution lines. The possibility of foreign terrorism exists in Alaska but also at a higher risk is local terrorism, where a mentally unstable or radical resident could seriously disrupt the safety along various points throughout the 737-mile route. Incidental accidents by residents along the route will require much closer monitoring than what has been identified in the DEIS.

## **SPILL**

### **Spills (Oil Spills, Response or Planning)**

*Comments related to potential oil spills, spill response or planning.*

#### SPILL 6\*

49 CFR 192.5 defines four distinct classifications of pipeline in proximity to dwellings and buildings. Ninety-six percent of commercial and private residences along the route are within a Class I location, which requires a pipeline to be buried to a minimum of 30 inches of depth. A majority of the commercial and private residences along the Parks Highway right-of-way corridor are currently in close proximity to the Parks Highway right-of-way limit, which in most instances is 150 feet on both sides of the highway centerline. The proposed pipeline is planned to be off the running surface of the highway and remain within the highway right-of-way corridor. The distance between the highways running surface, the proposed pipeline route and commercial and private residences will be only several feet distance from pipeline to constant human activity. The ASAP-DEIS has identified a maximum spacing of block valves at 20-miles apart. During a rupture or release, the amount of liquids released would be equivalent to eight semi-trucks worth of propane or 73,300 gallons. The response time has never been addressed however, the response time could take several hours up to days to identify, locate and repair damages depending on type of leak, location and weather conditions. The potential leak or rupture would damage water sources, vegetation, wildlife and humans for many years afterwards. Since the terrorist attack of September 11, 2011 terrorism has become a safety and security concern for energy facilities and distribution lines. The possibility of foreign terrorism exists in Alaska but also at a higher risk is local terrorism, where a mentally unstable or radical resident could seriously disrupt the safety along various points throughout the 737-mile route. Incidental accidents by residents along the route will require much closer monitoring than what has been identified in the DEIS.

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## SUB

## Subsistence

*Comments on potential impacts to subsistence activities*

- SUB 1 The DSEIS should also explicitly require consultation with NMFS and AEWG and should require vessels operators to enter into annual Conflict Avoidance Agreement (CAA) negotiations because of potential vessel traffic that overlaps with the bowhead whale subsistence hunt. The DSEIS should include certain successful measures that the whalers and operators have developed over years of experience with the CAA process. In particular, the use of communication centers and vessel transit guidelines are relatively noncontroversial and have relevance to activities throughout the bowhead whale migratory and subsistence hunting areas.
- SUB 2 The 2012 FEIS notes that the majority of bowheads migrate eleven miles offshore from Prudhoe, and that the "occurrence of bowhead whales in the proposed project area is therefore highly unlikely." However, the FEIS also notes bowhead whales could be temporarily disturbed and move away from the vessels. This deflection can harm our subsistence hunt, by pushing whales farther offshore or causing them to act skittish, which can make the whales more difficult to take.
- SUB 3 In the DSEIS, the Corps should carefully consider the impacts of underwater noise and disturbance to bowhead whales and subsistence hunting. Our hunters have observed barge traffic interfering with hunting in the past. In addition, as NMFS reports that "sounds associated with vessel traffic are primarily generated by cavitation of the propeller," and that source levels for tugs pulling large barges are relatively high.
- SUB 4 As the Corps recognized in the 2012 FEIS, Barrow, Nuiqsut and Kaktovik all conduct fall bowhead whale hunts. The Corps briefly discusses marine subsistence use areas. However, the AEWG strongly encourages the Corps to work directly with us to more accurately and specifically describe the extent and timing of these areas, and to identify their overlaps with the vessel traffic that will travel to and from West Dock.
- SUB 5 The Corps should require barges to avoid areas of active or anticipated whaling activity. The Corps should ensure, through provisions of the SDEIS, that barges do not affect subsistence activities in the Chukchi and Beaufort Sea throughout their transit by requiring the barges to remain as far offshore as weather and ice conditions permit, and at all times at least 5 miles offshore.
- SUB 6 The AEWG asks that the Corps make marine mammal observers an explicit requirement under the SDEIS.

## **SUB**

### **Subsistence**

*Comments on potential impacts to subsistence activities*

- SUB 7      Additionally, we request that the Corps, through the SDEIS, require barges that inadvertently approach within one mile of observed bowhead whales to take precautions to avoid potential interaction with the whales.
- SUB 8      The ANILCA 810 analysis should evaluate the concerns of the Wiseman community about their subsistence activities along the Dalton Highway Corridor and the Cantwell community along the Parks Highway. Disturbance and displacement of wildlife movement may be short term but will likely be a large concern for local residents hunting moose, sheep, and caribou in the area.
- SUB 9      Comments expressed concern about the timing and staging of construction, and where the pipeline will be buried related to potential effects on caribou, especially during peak construction.
- SUB 10     Vessel operations and timing is the biggest concern because it will have a very direct impact to the marine mammals, especially the bowheads that are real sensitive to noise.
- SUB 11     Whaling season starts in August, just as barges may be transiting the area towards West Dock and this is a concern for whaling captains. How is West Dock going to be used?
- SUB 12     Attention should be given to consideration of the dependence of local communities on local and regional subsistence resources, access to those resources, and perception of the quality of those resources
- SUB 13     Identify community traditional use areas for subsistence, harvesting, hunting and trapping, fishing, migration, etc.
- SUB 14     Describe the access limitations to these traditional use areas and their impacts to local communities
- SUB 15     Coordinate with the community on options for mitigating impacts associated with accessibility to traditional and accustomed use areas
- SUB 16     Identify project activities that may conflict with traditional and accustomed uses (e.g. barge traffic in the Beaufort Sea may conflict with subsistence activities)
- SUB 17     Coordinate with the community to identify mitigation options for avoiding and minimizing conflicts between traditional and accustomed subsistence uses with the construction and operation of this project

## **SUB Subsistence**

*Comments on potential impacts to subsistence activities*

- SUB 18 A natural gas line will certainly increase the temporary and permanent human population to the area as well as nearby communities. More and more people from Anchorage and Fairbanks continue to hunt within Game Management Unit 13E and Game Management Unit 20A. Traditional hunting areas such as the Yanert River Valley are no longer used by local subsistence hunters due to impacts from the increased hunting activity. Attraction to job opportunities, if a gas line were built, will occur in this area and will only add more pressure to traditional hunting activities. Customary and traditional uses of moose, caribou, fish and plants are an integral component to the spiritual wellbeing of the Ahtna people. Migration routes, calf mortality and the increase from demand side users during the pre-construction, construction and operation and maintenances phases have been less than exhaustive.
- SUB 19\* Customary and traditional use of fish, wild game and plant resources by these villages will be affected to some extent. Large mammals such as caribou and moose are to the utmost importance to the Ahtna people, as are fishing and the gathering of plants. The Denali Highway and the Parks Highway are travel routes to the fishing, hunting and gathering of the Ahtna people. Any activities in these areas will distress and affect wild game behavior. Caribou and moose will move away from human activity and noise. Hunting will have to take place in other areas to compensate for lost hunting areas, due to this project and to the influx of people out in the field hunting wild game. Fishing and gathering by the Ahtna People may not be as directly affected by this project. Ahtna People will have to gather plants, berries and wood in other areas to maintain their livelihood.
- SUB 20\* Other proposed large-scale projects near us include an open-pit mine 40 miles south of us. More and more people are coming up here and more and more impacts are occurring: trespassing, fishing and hunting for limited game resources. The tribe can't afford to control this. Workers at camps shouldn't be allowed to hunt or fish in our traditional areas on their off-time, as it brings unwanted pressure on those resources.
- SUB 21\* A natural gas line will certainly increase the temporary and permanent human population to the area as well as nearby communities. More and more people from Anchorage and Fairbanks continue to hunt within Game Management Unit 13E and Game Management Unit 20A. Traditional hunting areas such as the Yanert River Valley are no longer used by local subsistence hunters due to impacts from the increased hunting activity. Attraction to job opportunities, if a gas line were built, will occur in this area and will only add more pressure to traditional hunting activities.

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## **SUB**

### **Subsistence**

*Comments on potential impacts to subsistence activities*

SUB 22\*

A research study of how the natural gas pipeline would affect customary and traditional use of wild game should be implemented. Research study such as this will enable and provide the local customary and traditional users documentation it's affects by the proposed natural gas pipeline.

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## VIS

### Visual Resources

*Comments regarding visual/scenic resources.*

- VIS 1 If ASAP goes through Denali State Park it is imperative that the cleared right-of-way and material source areas do not mar the scenic quality of the park. If the ASAP right-of-way is separate from the highway and additional clearings are made from material source sites (i.e., east of MP 615 as well as MP 622 and 623), the view across the Chulitna River valley to the mountains as seen from Kesugi and Curry Ridges will be degraded because not just one but two clearings will be seen. There are two material source sites either side of the Parks Highway at MP 633 that would affect the view of the Alaska Range from the proposed south Denali Visitor Center.
- VIS 2 Consider minimization of visual and noise impacts, and reoccurring impacts associated with construction and maintenance.
- VIS 3 The pipeline corridor will be an eyesore in Denali National Park.
- VIS 4 There may be opportunities for increased scenic views due to land clearing.
- VIS 5 A scenic byway plan protects the view shed near Wiseman. Concern is that the high elevation pit will destroy view.

## **WAT**

### **Wetlands / Water**

*Comments regarding wetlands, streams, rivers or associated vegetation.*

- WAT 1 Collect baseline water quality information in the project area. Identify the period of record of the collected water quality data. List the water quality parameters for which data has been collected (if certain parameters have been dropped, specify the basis). The QA/QC should be maintained at adequately low detection levels
- WAT 2 Include maps showing the locations and terrain elevation of all past and present data collection stations (explain any that have been dropped or location changed)
- WAT 3 Identify and discuss applicable national and state water quality regulations, standards, and guidance. Identify and discuss required wastewater permits.
- WAT 4 Describe proposed water treatment options and alternatives
- WAT 5 Identify and evaluate impacts to any listed impaired water bodies in and adjacent to the project area that is on the current EPA approved §303(d) list. Specify the pollutant(s), source(s) and the water quality standard(s) exceeded that was the basis for its listing. Identify whether a water body recovery plan and/or a Total Maximum Daily Load (TMDL) has been developed and/or implemented. Describe any enhancement efforts for those impaired waters, and how the proposed project would coordinate with on-going protection efforts, if any.
- WAT 6 Identify mitigation measures to minimize further degradation of impaired waters in the project area. Identify the monitoring efforts to ensure that mitigation measures are effective in achieving water quality standards.
- WAT 7 Identify and map the location of known public drinking water supplies and their sources, surface and ground waters, aquifers, recharge zones, natural springs, etc. within the project area. Identify the location of known water supply wells in the project area. The Alaska Department of Natural Resources (ADNR) maintains a well log tracking system (WELTS) database that provides information on reported sources of drinking water. Identify project construction and/or operational activities that could potentially impact known source water areas. Identify potential contaminants that may impact known source waters through infiltration/seepage.
- WAT 8 Distinguish the effects that any current or historic activities, including mining activities, have had on source waters of the project area. Identify mitigation measures and monitoring activities to protect known source water areas.

## **WAT**

### **Wetlands / Water**

*Comments regarding wetlands, streams, rivers or associated vegetation.*

- WAT 9      Disclose that this project would meet the requirements of ADEC's APDES permit program, including development of Storm Water Pollution Prevention Plans (SWPPPs), submittal of NOIs, reporting, and monitoring
- WAT 10     Identify specific best management practices (BMPs), erosion and sediment control, and other mitigation measures to minimize impacts. Describe how the anti-degradation provisions would be achieved for this project. Identify mitigation measures to minimize impacts to water quality standards.
- WAT 11     Characterize all proposed the water body crossings, and summarize the information for width, depth, stream flow, presence/absence of fish, fish species, etc.
- WAT 12     For each water body crossing, identify the type of construction methods (open cut – dry or wet, trenching, HDD, etc.) and/or structures (bridges, culverts, etc.) that would be implemented
- WAT 13     Develop a water body crossing plan and included it in the Supplemental EIS
- WAT 14     Identify mitigation measures, such as maintaining no disturbance buffers, in water timing restrictions for fish migration and spawning, etc. Identify monitoring provisions to ensure effectiveness of mitigation measures.
- WAT 15     Identify existing and potential surface water locations where water withdrawal for project construction and operation would occur. Provide the water withdrawal locations on a map
- WAT 16     Characterize each water resource and identify its surface area, maximum depths, available volume of water, volume of proposed withdrawal, and presence/absence of resident and/or anadromous fish species. Identify any mitigation measures/commitments, such as establishing water withdrawal rates, timing of water withdrawal, and screening to avoid impacts to fish. Identify monitoring activities to ensure that fisheries resources are protected.
- WAT 17     Identify the maximum water requirements for project construction and operation
- WAT 18     Describe the appropriate and practicable steps taken to avoid, minimize, and compensate for unavoidable impacts to wetlands, aquatic resources, and riparian areas. Alternatives should consider options for avoiding and minimizing wetland impacts;

## **WAT Wetlands / Water**

*Comments regarding wetlands, streams, rivers or associated vegetation.*

- WAT 19 Characterize acreages, habitat types and quantify areas of wetlands and aquatic resources within the project area – include their location and information on aerial photograph maps
- WAT 20 For the proposed natural gas pipeline, jurisdictional Waters of the United States should be mapped using aerial photo interpretation within a minimum 1,000 feet corridor. Field delineation of wetlands should be conducted within a minimum 300-ft wide corridor, as agreed to for other Alaska pipeline projects
- WAT 21 Describe mitigation measures/commitments to minimize the unavoidable impacts to wetlands
- WAT 22 Develop a monitoring plan for the Minto Flats wetlands to ensure implementation of mitigation measures and their effectiveness. The monitoring plan should also specify any corrective measures
- WAT 23 The proposed warehousing pad should avoid being located in open-water ponds, when there are less wet areas available in the vicinity. These particular ponds are part of an old basin wetland complex, one of the most productive wetland habitats in the Prudhoe Bay area, especially for migratory birds
- WAT 24 The SEIS should identify the appropriate compensatory mitigation types – permittee responsible, mitigation banks, in-lieu fee programs that would be utilized for this project
- WAT 25 Compensatory mitigation must be based on a functional assessment of wetlands and aquatic resources and replacement of those functions lost according to an ecologically appropriate mitigation or replacement ratio
- WAT 26 The project proponent should consider establishing a mitigation bank for this project to compensate for the wetland impacts. A combination of compensatory options, such as inlieu fees, mitigation bank, and/or permittee-responsible mitigation should be evaluated in the SEIS.
- WAT 27 Avoid discharging hydrostatic test water into surface waters containing resident and/or anadromous fish
- WAT 28 Identify the discharge locations to land and/or surface waters, and discharge methods
- WAT 28 Concerns about erosion and sedimentation in steeper areas, near water bodies, and during heavy rain events. Stream and wetland crossings create erosion problems especially with "open cut" process vs HDD or "bore crossing" technique.

## **WAT**

### **Wetlands / Water**

*Comments regarding wetlands, streams, rivers or associated vegetation.*

- WAT 29 Concerns about potential impacts to groundwater and surface water quality. The EIS needs to consider valid data on existing WQ and potential impacts. During operations and maintenance of the pipeline, what are the potential actions that may cause a reduction of water quality and what are the plans for mitigation and prevention during repairs and maintenance of the pipeline?
- WAT 30 Concerns that the project will expose soil to erosion throughout the years of construction and operation, resulting in lowering of water quality. Introduced silt will result in reduced water quality. Erosion will introduce trace elements, compounds, and sediment material into the water. Siltation also leads to destruction of aquatic habitat.
- WAT 31 Questions regarding water sources: What are the conditions of the potential water sources? What are the volumes of water in these sources that would be affected and what are the secondary impacts to land and aquatic wildlife? And in these locations, what are the potential impacts to water quality? What minerals and compounds exist in the water sources that would be introduced onto lands and waters throughout the pipeline corridor from the snow/ice pads and roads? Will there be high mineralization in these areas caused by the water used for construction? During winter construction and pipeline testing some water sources may be completely frozen. Are spring and aquifer sites available and what may be the impact to wildlife caused by the withdrawal of water from these sites?
- WAT 32 Concerns regarding subsurface water flows and frost: What are the impacts of the pipeline trench intercepting, concentrating, and redirecting subsurface water flows? And could this thaw consolidation increase probability of slope instability throughout the corridor? What would be the impact of frost bulbs produced by the pipeline on damming surface and subsurface water? What is the effect of concentrations of water in these areas? And will this accelerate ice and permafrost thawing? And what are the long-term impacts to water quality caused by these actions? And in addition, what are the secondary impacts to wildlife and on pipeline safety and integrity? How much icing and formation of frozen ground ice might occur in these areas and their impact on the pipeline? How much surface damming might occur to redirect surface water?
- WAT 33 The plan calls for utilization of borrow material throughout the corridor. What are the potential borrow sites and what are the water quality and conditions in these areas? What are the impacts to hydrology that may be caused by excavation at these sites?

## WLD

### Wildlife

*Comments regarding potential effects on wildlife or wildlife related issues with the proposed pipeline.*

- WLD 1 If the ASAP right-of-way is not adjacent to the George Parks Highway, presently undisturbed stretches of wildlife habitat will be impacted.
- WLD 2 The text states pipeline camps will be fenced for security and animal control as needed. All camps need to be surrounded by electric fences to minimize human-wildlife interactions, particularly for bears. Wildlife-human interactions at camps were a serious problem during construction of the Trans-Alaska Pipeline System.
- WLD 3 Effects to wildlife also include intentional feeding of wildlife by humans and improper storage and disposal of putrescible waste and other materials that may lead to death or injury of animals.
- WLD 4 Mitigation should include avoiding excavation activities during times of the year when major movements (i.e., migrations) across the right-of-way occur. ADF&G blasting standards apply to protection of fish resources. Recommendations may be provided regarding blasting during sensitive wildlife life stages (e.g., Dall's sheep lambing). There should be prohibition on feeding wildlife. All construction camps should be surrounded with electric fences to minimize wildlife-human interactions.
- WLD 5 Satellite-tagged bowhead whales have appeared in the Prudhoe Bay area as early as late July, so they may be affected by module transport during the ice free period. See Quakenbush, L. T., R. J. Small, and J. J. Citta. 2013. Satellite tracking of bowhead whales: movements and analysis from 2006 to 2012. (PDF 3,635 kB) U.S. Dept. of the Interior, Bureau of Ocean Energy Management, Alaska Outer Continental Shelf Region, Anchorage, AK. OCS Study BOEM 2013-01110. 56 pp.
- WLD 6 Concern about the timing and staging of construction, and where the pipeline will be buried and its effects on caribou, especially during peak construction.
- WLD 7 Identify any biologically important areas, such as the boulder patch habitat, polar bear and ice seal dens, migratory routes (fish, whales, walrus), benthic communities (e.g., clams), and subsistence areas
- WLD 8 Implement effective mitigation measures to ensure that marine resources and habitats are adequately protected. Incorporate a monitoring plan for marine protected resources and their habitat to ensure effectiveness of mitigation measures.

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- WLD 9 Identify all listed species - endangered, threatened, and candidate species, within and adjacent to the project area
- WLD 10 Describe any designated critical habitat for these species and their migratory range, breeding and feeding areas
- WLD 11 Include the Biological Assessments and description of the outcomes under ESA Section 7 consultations with the federal resource agencies
- WLD 12 Expressed concerns about habitat loss and fragmentation when ROW is cleared. Concerns about species movement when ROW is cleared - both inhibiting native species movement and introduction of invasive species.
- WLD 13 If a natural gas line were built through the Cantwell community area and extend to Anchorage, the proposed construction activity, from the increase of non-subsistence hunters into the area, would negatively affect the seasonal migration patterns of caribou. Construction activities will disrupt caribou behavior. Caribou may move away from an area that has higher than normal noise levels and a constant presence of human activities. Over time, after activities have stopped, caribou may revert back to their historical migratory pattern. Long term development and permanently built barriers will certainly negatively affect caribou. If a combination of a natural gas line and a hydro-dam, such as the proposed Susitna-Watana Dam Hydro-Project, were to be built in the area, this would seriously impact the migratory caribou routes and behavior.
- WLD 14\* If a natural gas line were built through the Cantwell community area and extend to Anchorage, the proposed construction activity, from the increase of non-subsistence hunters into the area, would negatively affect the seasonal migration patterns of caribou. Construction activities will disrupt caribou behavior. Caribou may move away from an area that has higher than normal noise levels and a constant presence of human activities. Over time, after activities have stopped, caribou may revert back to their historical migratory pattern. Long term development and permanently built barriers will certainly negatively affect caribou. If a combination of a natural gas line and a hydro-dam, such as the proposed Susitna-Watana Dam Hydro-Project, were to be built in the area, this would seriously impact the migratory caribou routes and behavior.

\* Comment was submitted during the 2012 FEIS process. A small number of comments were received from stakeholders in 2012 that were not addressed because the Corps did not sign a final Record of Decision. These comments from 2012 have been included in this report for consideration as the project progresses and are identified in Section 2.3 as 2012 comments.