


Alaska Native Corporations (ANC)

ANC1 – Ahtna, Incorporated

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Our Culture Unites Us; Our Land Sustains Us; Our People are Prosperous

October 3, 2019

Federal Energy Regulatory Commission
Kimberly D. Bose, Secretary
888 First Street NE, Room 1A
Washington DC 20426
Sent Via eFile: www.ferc.gov

Re: Alaska Liquid Natural Gas Pipeline (Docket Number CP17-178-000), Construction and Operation of an 806.6 Mile Pipeline to Transport Supply of Natural Gas from Alaska's North Slope to the Matanuska-Susitna Borough

Dear Ms. Bose:

Ahtna, Incorporated (Ahtna) is pleased to submit the following comments on the Alaska Liquid Natural Gas Pipeline (Alaska LNG) Draft Environmental Impact Statement (DEIS) analyzing the potential development of a natural gas pipeline extending from Alaska's North Slope to the Matanuska-Susitna Borough. Ahtna supports safe and responsible development and submits these comments to identify issues where the Federal Energy Regulatory Commission's (FERC's) analysis and process should be improved to better address the impacts of this proposed development on the Ahtna people.

I. Ahtna's Interest in Alaska LNG

Ahtna is one of the thirteen Native regional corporations established by Congress under the terms of the Alaska Native Claims Settlement Act (ANCSA), Pub. L. No. 92-203, 85 Stat. 688 (1971), *as amended*. Voting shares of stock originally were issued to approximately 1,079 Alaska Natives who represent the indigenous people of the region and whose ancestors have inhabited the region for thousands of years. Today, Ahtna has more than 1,730 shareholders. Many of Ahtna's shareholders reside in semi-remote villages with few economic opportunities.

Ahtna is the sixth largest private landowner in Alaska, with a land entitlement under ANCSA of more than 1.7 million acres. Ahtna is also the largest private property owner impacted by the Alaska LNG pipeline. Ahtna's lands extend from the Nenana River in the north to the Chugach Range in the south. The Alaska-Canada border forms the eastern border and the western portion reaches into Denali National Park and Preserve. As proposed, the pipeline will

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ANC1 – Ahtna, Incorporated (cont’d)

CC-495

cross 35 miles of Ahtna land.

Ahtna’s mission is to promote the economic and social well-being of our present and future shareholders, to strengthen the Native way of life of our Alaska Native shareholders, and to protect and enhance our land and resources, according to our mission statement: “Our Culture Unites Us, Our Land Sustains Us, Our People are Prosperous” In furtherance of this mission, and pursuant to the terms of ANCSA, Ahtna operates a diverse family of companies on behalf of its shareholders, including numerous businesses across the nation in the areas of oil pipeline services, utility management, security, engineering management, land and natural resource development, facility management, construction, and tourism.

II. Comments

While the Alaska LNG will benefit some, the DEIS does not adequately analyze the impacts of the pipeline on the Ahtna people. As further elaborated below, Ahtna’s comments in response to this DEIS concern the safety, socio-economic impacts, right-of-way acquisition, and lack of tribal consultation.

Consultation

The use and development of lands and resources in Alaska that are within or near ANCSA lands—including Federal and State gas line development—are subject to a unique statutory regime established under ANCSA and the Alaska National Interest Lands Conservation Act of 1980 (ANILCA), Pub. L. No. 96-487, 94 Stat. 2371 (1980), *as amended*. This regime is complex, interrelated, and designed to fulfill the Native American relations, economic, and the environmental purposes of both of these Acts. The DEIS does not address all activities within the scope of this project or the existence of these unique legal authorities. Ahtna urges FERC to expressly recognize that the Alaska LNG project is subject to the specific, unique statutory provisions enacted by Congress under ANCSA, ANILCA and Executive Order 13175 and to fulfill the consultation requirements imposed by these authorities.

ANC1-1

ANC1-1

The ANCSA is discussed in sections 1.2.6, 1.6.16, 4.9.5.1, and 4.9.7 of the final EIS. The ANILCA is discussed in sections 1.2.6, 1.2.7, 1.3, 1.6.16, and 4.14 of the final EIS.

As noted, Ahtna is the largest private property impacted by the proposed gas pipeline, but to date, neither FERC nor the Alaska Gas Development Corporation (AGDC) has communicated with Ahtna nor made any commitments to Ahtna regarding access or use of the 35-miles of right-of-way over Ahtna land that is required for the pipeline. This should be foremost before other development or planning can occur for this project.

ANC1-2

ANC1-2

FERC staff provided notices and information on the Project as well as copies of the draft EIS to Alaska Native Corporations and Alaska Native Villages, including Ahtna, Incorporated, as discussed in sections 1.3.2, 1.3.3, and 4.13.3 of the final EIS.

Customary and Traditional Uses.

The DEIS does not adequately analyze the how the proposed pipeline would affect customary and traditional use of wild game by the Ahtna people or how the pipeline’s impacts would aggravate ongoing cumulative impacts to Ahtna subsistence use and way of life.

ANC1-3

ANC1-3

Our analysis of impacts on customary and traditional uses of wild game is provided in section 4.14 of the final EIS. Impacts on the community of Cantwell specifically are discussed in section 4.14.3.4 of the final EIS.

The Ahtna-Athabascan Indians have used the area in the vicinity of the proposed pipeline for subsistence

ANC1 – Ahtna, Incorporated (cont'd)

purposes and minor and major trade routes for thousands of years. The Ahtna people permanently settled in the area during the Alaska railroad construction period in the 1920's. Ahtna people have fished, hunted, gathered and traded within the sub-region for thousands of years, dating back to the post-ice age period. Customary and traditional uses of fin-fish, wild game, and plant have occurred throughout the millennium by the Ahtna people, and are of utmost importance to the Ahtna people today. Today, the Native Village of Cantwell is located 210 miles north of Anchorage and is 27 miles from the Denali National Park (DNP) entrance. The DNP forms a boundary along the western Ahtna Region.

The Ahtna people and specifically the Native Village of Cantwell continue to largely depend upon caribou and moose and is a mainstay of their livelihood and customary and traditional uses. Under the State Tier I and Community hunts, harvest data records show that from the 1990's the residents of Cantwell have harvested nearly 200 caribou and moose. However, the harvest has evolved over the years. Changes to subsistence use have occurred primarily due to federal and state hunting regulations, socio-economic conditions, and the adaptation from semi-permanent nomadic settlements to permanent settlements into modernized communities. All of these factors have led to rapid changes in the methods and means of fishing, hunting, and plant gatherings by the Ahtna people.

Existing federal restrictions have already had a significant impact on Ahtna subsistence harvests. Under the federal management, hunting occurs on DNP lands to some extent. The National Park Service restricts the use of Off Road Vehicles (ORV) within the original boundaries of DNP, i.e. "hard park." Access to prime hunting areas in the hard park, without the use of ORVs, has severely impeded and curtailed hunting not only within the hard park, but within all the DNP. Harvest data show that moose harvest levels from 1990 to 2011 within DNP is 32.

A natural gas line built through the Cantwell community area and extended to Anchorage would further negatively impact Ahtna ways of life, both during the construction and operation of the pipeline. | ANC1-3

A natural gas line will certainly increase the temporary and permanent human population to the area as well as nearby communities. Even without the pipeline, more and more non-subsistence hunters from Anchorage and Fairbanks continue to hunt within Game Management Unit 13E and Game Management Unit 20A. This non-subsistence use has negatively affected the seasonal migration patterns of caribou. Local subsistence hunters no longer use traditional hunting areas such as the Yanert River Valley because of the negative impacts from the increased hunting activity. If a gas line were built, economic opportunity would attract more people to the area, further increasing competition for subsistence resources, and adding more pressure to traditional hunting activities.

ANC1-3 Our analysis of impacts on customary and traditional uses of wild game is provided in section 4.14 of the final EIS. Impacts on the community of Cantwell specifically are discussed in section 4.14.3.4 of the final EIS.

ANC1 – Ahtna, Incorporated (cont'd)

The impact of the pipeline on caribou migratory patterns is not understood. Over time caribou can adjust to objects and follow the same migratory routes or patterns, but the DEIS's analysis of migration routes, calf mortality and the increase from demand side users during the pre-construction, construction and operation and maintenances phases is superficial. While research studies have shown that food sources of the Nelchina Caribou Herd have been the primary reason for changes in migratory pattern changes, 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 to their historical migratory pattern. Long term development and permanently built barriers will certainly negatively affect caribou. If a natural gas line were built in the area, this could seriously impact the migratory caribou routes and behavior, which would adversely affect Ahtna subsistence practices.

Ahtna requests that FERC conduct a research study to analyze how the natural gas pipeline would affect customary and traditional use of wild game. Such a study such would document existing customary and traditional uses and provide the basis to identify impacts to those uses caused by the proposed natural gas pipeline.

ANC1-3

III. Conclusion

Customary and traditional uses of moose, caribou, fish, and plants are an integral component to the spiritual wellbeing of the Ahtna people. Ahtna, Inc. is supportive of responsible and safe resource development as identified in our mission statement, but FERC and AGDC have fulfilled neither their statutory obligations to consult with Ahtna, nor their NEPA obligation to fully analyze the impacts of the pipeline on the Ahtna people. Ahtna welcomes the opportunity to meet with FERC and AGDC to resolve these deficiencies.

Thank you for your consideration of these comments.



Michelle Anderson
President, Ahtna, Incorporated

ANC1-3

Our analysis of impacts on customary and traditional uses of wild game is provided in section 4.14 of the final EIS. Impacts on the community of Cantwell specifically are discussed in section 4.14.3.4 of the final EIS.

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ANC1 – Ahtna, Incorporated (cont'd)

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CC-498

ANC1 – Ahtna, Incorporated (cont'd)

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CC-499

ANC2 – Doyon

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Sarah E Obed, Fairbanks, AK.

Doyon is one of the thirteen Native regional corporations established by Congress under the terms of the Alaska Native Claims Settlement Act ("ANCSA"). Headquartered in Fairbanks, Doyon has more than 20,000 Alaska Native shareholders. Doyon is the largest private landowner in Alaska, with a land entitlement under ANCSA of more than 12.5 million acres. Doyon's lands extend from the Brooks Range in the north to the Alaska Range in the south. The Alaska-Canada border forms the eastern border and the western portion almost reaches the Bering Sea.

Doyon's mission is to continually enhance its position as a financially strong Native corporation in order to promote the economic and social well-being of its shareholders and future shareholders, to strengthen its Native way of life, and to protect and enhance its land and resources. In furtherance of this mission, Doyon currently is pursuing several minerals and oil and gas exploration projects in Interior Alaska. If successful, these projects will provide substantial benefits to Doyon and its shareholders, and, by providing new employment opportunities and helping alleviate the energy crisis in Interior Alaska, to all Alaskans.

Doyon has a strong interest in and continues to support efforts to advance an Alaska natural gas pipeline to commercialize stranded Alaska North Slope ("ANS") natural gas resources as well as additional natural gas resources to be developed by other explorers and producers in the State of Alaska.

A successful Alaska LNG Project must provide infrastructure to enhance Alaska oil and gas exploration and production opportunities not only for the major producers, but for other explorers and producers as well. To maximize the potential of this important infrastructure project for the benefit of all Alaskans, it is critical that the Project be owned and operated on terms that will provide commercially reasonable access for third parties.

Doyon owns substantial natural gas interests in the State. Doyon owns oil and gas interests in more than 1.5 million acres in the Yukon Flats basin. Some activities related to these interests are specifically identified in the cumulative impacts section of the DEIS. For instance, the Existing/Future Project Overview Map presented on page 4-1116 of the DEIS identifies "Yukon Flats Oil & Gas Development and Nenana Basin Area Oil & Gas Development." And, page 4-1148 and 4-1152 specifically identify "ongoing oil and gas activities in the Nenana Basin and Yukon Flats."

The benefits to Doyon and its shareholders and to the State associated with the development of these gas interests can only be realized if Doyon is able to obtain access to pipeline capacity on commercially reasonable terms. As the DEIS recognizes, "[d]espite abundant supplies of natural gas on the North Slope, most of the state's gas production cannot be brought to market due to a lack of natural gas pipeline infrastructure." DEIS, p. 3-3. Commercialization of ANS natural gas resources is, of course, one of AGDC's stated objectives for the Project. DEIS, p. 1-3. Although we of course recognize that significant details remain to be

ANC2-1

ANC2-1

Comment noted.

CC-500

ANC2 – Doyon (cont’d)

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worked out, including with specific regard to access and expansion, Doyon believes that the Alaska LNG Project also provides a general framework that could encourage resource exploration and development (including for non-ANS resources) by Doyon and other explorers and producers in the State. As AGDC continues to pursue this project to commercialize ANS gas resources, it is critically important that sufficient opportunities be provided for gas resources that may be developed along the pipeline route to be shipped through the Project as well, and that such resources not be stranded the same way ANS natural gas supplies have been for decades.

The Alaska LNG Project also has the potential to provide infrastructure to help provide reliable, affordable natural gas supplies to benefit gas consumers and support long-term economic development in the State. As the DEIS recognizes, for instance, “[t]he Fairbanks area lacks a direct-source gas transmission pipeline, instead receiving LNG via truck from the Titan LNG liquefaction plant at Point MacKenzie.” DEIS, p. 3-3. Lacking an affordable, reliable natural gas supply, many residents in the area currently rely on expensive fuel oil or even wood to heat their homes.

It is critical to Doyon and its shareholders that a large-scale natural gas transportation system be developed in the State. It is essential to the full realization of the benefits of the Alaska LNG Project—as well as to the realization of the economic development opportunities that Congress contemplated would be open to Doyon as a fundamental element of the settlement of aboriginal land claims set forth in ANCSA—that the terms to be developed for access and expansion provide meaningful, commercially feasible opportunities for Doyon and other explorers and developers to secure capacity on the Project. As the Project continues to move forward, we urge the Commission to help ensure that these important Project objectives are achieved.

ANC2-2

ANC2-2

Comment noted.

ANC2-3

ANC2-3

Comment noted.

CC-501

ANC3 – Cook Inlet Region

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October 3, 2019

Secretary Kimberly D. Bose
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: Cook Inlet Region, Inc. Comments to the Alaska LNG Project Draft Environmental Impact Statement, FERC Docket No. CP17-178-000

Dear Ms. Bose:

The following comments are submitted on behalf of Cook Inlet Region, Inc. (CIRI), an Alaska Native Regional Corporation formed under the Alaska Native Claims Settlement Act of 1971 (ANCSA) to benefit Alaska Natives with ties to the Cook Inlet region. In addition to having land holdings and entitlements yet fulfilled throughout the state, CIRI is the largest private landowner in Southcentral Alaska, with more than 1.3 million acres of subsurface estate and large surface estates shared between CIRI and its seven village corporations.

In response to the June 2019 release of the Alaska LNG Project (AKLNG) Draft Environmental Impact Statement (DEIS), CIRI expresses general support for environmentally responsible resource development throughout the State of Alaska and for the AKLNG project. CIRI appreciates incorporation of traditional knowledge and recognition of important subsistence and cultural resources in the program area and the extensive environmental analyses conducted in furtherance of the DEIS.

More specifically, CIRI has the following comments:

CIRI welcomes the introduction of additional pipeline infrastructure, which will ensure long-term, economic energy to Alaskan communities. CIRI requests that the final environmental impact statement (FEIS) ensures interconnection for potential gas resources that may be developed in the future along the route of the pipeline. For example, what percentage of the pipeline capacity is going to be reserved for North Slope producers? CIRI would like the Alaska Gasline Development Corporation (AGDC) to ensure there is available capacity within the Cook Inlet region such that additional gas production would benefit from close proximity to the AKLNG. Additionally, CIRI requests that AGDC make gas off-take accessible to CIRI at commercially reasonable rates to enable future economic development opportunities near the AKLNG.

The DEIS states that "it is not anticipated that Project construction or operation would affect current coal resources." The AKLNG is proposed to run through the Beluga Coal Field. CIRI expects all reasonable measures to accommodate CIRI access to its land and resources in the future and requests the same language be include in the FEIS. Further, Section 4.1.2.1 states that mineral resource would be restricted or blocked as a result of the Mainline Facilities. CIRI's access to its lands and resources are protected in federal law

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CC-502

ANC3-1

ANC3-1 Comment noted.

ANC3-2

ANC3-2 Comment noted. In-state gas interconnections are discussed in section 4.19.2.5 of the final EIS.

ANC3-3

ANC3-3 Section 4.1.2.3 of the final EIS has been updated to address this comment.

ANC3 – Cook Inlet Region (cont'd)

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and as a practical matter, CIRI's ability to develop its lands should not be inhibited. Therefore, CIRI requests that AGDC ensure that CIRI is accommodated access to roads and rights-of-way that may otherwise restrict access to and development of CIRI's lands. Moreover, for purposes of enabling CIRI to develop its natural resources, the FEIS should clearly state safe distances for blasting and drilling-type activities vis-à-vis the AKLNG pipeline.

ANC3-3

Page 4-20 discusses potential contamination from borrow site development. CIRI requests that AGDC ensure that standard Stormwater Pollution Prevention Plan (SWPPP) procedures are implemented to reduce stormwater runoff and suggests that AGDC strive to eliminate runoff entirely where acid rock drainage is possible. The replacement of topsoil and vegetative mats and replanting of native vegetation on CIRI lands and throughout the project is important to minimize impacts to lands and their natural resources. Further, the pipeline will run through some CIRI lands that contain coal. If exposed, could runoff – including acid rock drainage – affect associated waters and wetlands? Please ensure avoidance, minimization and mitigation of this potential be incorporated in the FEIS.

ANC3-4

CIRI appreciates the extensive discussion about subsistence and the acknowledgement that the magnitude of the impacts are largely unknown, and as such requests the opportunity for representatives from impacted village corporations and tribes to participate in future discussions.¹ Regarding some of FERC's mitigation measures outlined on page 4-716 of the DEIS, CIRI requests that AGDC regularly reach out to Alaska Native communities and other local communities and entities to request information regarding whether blasting activities or other pipeline related activities seem to be negatively affecting subsistence resources. Given the size and scope of AKLNG, it will be challenging for small, local communities to know the appropriate timing and avenues to communicate some of the proposed subsistence mitigation measures suggested in the DEIS. Establishing a regular communication touchpoint would significantly increase locals' ability to provide such relevant subsistence information to AGDC.

ANC3-5

Additionally, despite the DEIS's conclusion that impacts on moose overall would be "less than significant" there is discussion about the likely increase in the number of moose-vehicle collisions due to increased traffic. Moose are an important subsistence resource for the people of the Cook Inlet region. Therefore, CIRI requests that AGDC work with local communities to establish a process to distribute any moose killed as a result of a vehicle accident – and any other subsistence resource that is accidentally taken as a result of the project - to local villages for distribution to Elders and other community members. Such a plan should be in place in advance of any construction activity. This is particularly relevant given the impacts to subsistence resources the project is known to cause. A similar process should also be applied to clearing of trees for firewood. CIRI supports the BLM's recommendation to make firewood available to local residents, as noted on page 4-514, and requests a priority be given to Elders.

ANC3-6

The DEIS reports that 481 new roads will be required as a result of the AKLNG, and the DEIS presumes that those roads will be permanent, unless the landowner asks for the

ANC3-7

¹ FERC DEIS Pg. 4-715.

- ANC3-4 Section 4.3.2.4 of the final EIS discusses the potential for runoff from material sites and implementation of the Project SWPPP to minimize impacts. Section 4.1.3.10 of the final EIS discusses the Project-wide ARD/ML management plan with prevention and mitigation options should ARD/ML be exposed due to Project activities. Sections 4.2.5.2 and 4.5.2.1 of the final EIS discuss the replacement of topsoil (i.e., the organic layer) and revegetation of material sites.
- ANC3-5 Comment noted.
- ANC3-6 Section 4.14.3.5 of final EIS has been updated to address this comment.
- ANC3-7 Comment noted. This would be addressed in easement negotiations between AGDC and individual landowners, including CIRI.

ANC3 – Cook Inlet Region (cont'd)

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road to be removed. The onus should not be on the landowner to notify AGDC about the permanency of roads, but rather AGDC should flag the issue of permanency for the individual landowners at the time of seeking permission to build the road. There are many roadless communities that want to remain roadless, so the presumption should not be that the road shall remain unless otherwise notified. Moreover, it is unclear to whom, and within what timeframe, a landowner would need to notify AGDC of such an interest.

ANC3-7

In addition to the general issue of permanency, the 481 new roads will provide access to otherwise inaccessible locations and some access will likely be unwanted. Therefore, it is incumbent that AGDC also help mitigate the economic and resource damage through trespass that the project will invite. Trespass is becoming an increasing problem, particularly in roaded areas. As additional roads are installed for the project, CIRI requests that AGDC install signage where private lands are made more accessible. Where trespass proves to be more problematic in terms of increased or heightened trespass or repeated trespass by the same individual(s), CIRI requests the installation of fencing, game cameras, and other more stringent preventive protocols. Additionally, CIRI requests AGDC be required to notify trespassers of their violation, when possible, and report any known trespass of non-AKLNG affiliated persons to the relevant landowner. Identifying information such as license plates, names of individuals, pictures of trespass, and GPS location is important to landowners.

ANC3-8

ANC3-8 Sections 4.6.1.2, 4.9.1.2, 4.11.7.3, and 4.14.2 of the final EIS discuss impacts on resources due to the increased access to remote areas that would be provided by the Mainline Pipeline and access roads. Mitigation for these impacts, such as the installation of signs or blocking measures, would be addressed in easement negotiations between AGDC and individual landowners, including CIRI.

CIRI is pleased that the construction workforce is anticipated to be so significant. The DEIS assumes the need for a "substantial influx of workers into Alaska."² Since the impacts of the project will occur in Alaska and affect Alaskans, specifically rural Alaskans, CIRI asks that hiring efforts for both the construction and maintenance of the AKLNG prioritize local hire, and specifically, Alaska Native hire. CIRI appreciates the efforts described on page 4-610 of the DEIS, and notes that during the Anchorage testimony for the AKLNG, Tim Dillon of the Kenai Peninsula Economic Development District stated that his organization recently received a grant for training skillsets that are relevant to the construction and maintenance of the pipeline. Thus, there are additional resources that AGDC can and should leverage to source local hire beyond those listed as signatories of the Memorandum of Understanding. CIRI also encourages AGDC to work with Alaska Native Corporations to advertise job postings. Similarly, AGDC should prioritize hiring local contract companies to the greatest extent possible to keep in state as much of the \$7.1 billion of materials and services required to complete the AKLNG project.

ANC3-9

ANC3-9 Comment noted.

Regarding the Cook Inlet Beluga and other marine mammals, while the DEIS notes that "AGDC would conduct pile driving during daylight hours, making observation of marine mammals in the vicinity possible." However, CIRI contends the requirement should be "during daylight hours with good visibility", not merely the possibility of visibility due to the hour of day; pile driving generally should be consistent with the soft-start techniques after activities cease. Further, CIRI requests that anchor handling not occur at night or during periods of low/dark light since doing so increases the risk of noise activities affecting the beluga and other mammals.

ANC3-10

ANC3-10 Section 4.6.3.2 of the final EIS has been updated to address this comment.

Given the close proximity and linear location of the AKLNG at milepost 743 relative to the

ANC3-11

ANC3-11 Comment noted.

² FERC DEIS Pg. 4-595

CC-504

ANC3 – Cook Inlet Region (cont'd)

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Castle Mountain Fault, CIRI supports pipeline design near that milepost to be consistent with the above ground design (with horizontal support measures) similar to those proposed near the Denali Fault and as used for the Trans-Alaska Pipeline System (TAPS). Further, CIRI appreciates close examination of milepost 754-744 by the Pipeline Hazardous Materials and Safety Administration as well as the Theodore River Heater Station given the areas of potential liquefaction noted in Appendix F.³

ANC3-11

CIRI appreciates AGDC's focus and attention to promptly replacing pollinator habitat. Additionally, CIRI understands that generally, there will be a Restoration Plan and a Revegetation Plan. CIRI would appreciate a clear timeline of when CIRI lands should expect to be restored and/or revegetated after disturbance and what measures CIRI can employ if the plans call for measures that do not fully restore or revegetate CIRI lands.

ANC3-12

Regarding access to private land, CIRI's Lands and Natural Resource Department needs significant lead time in advance of issuing a permit to access CIRI property. Therefore, we request that the DEIS be revised to reflect a requirement that AGDC submit permit requests to private landowners, at minimum, 45 days prior to the date AGDC wants to access the land. CIRI, and other landowners, should not be held to an expedited and unattainable schedule due to poor planning. Additionally, CIRI requests that AGDC commit to purchase gravel resources, at a fair market value, first from CIRI for development of roads or pads and any other gravel-related work on CIRI lands.

ANC3-13

ANC3-14

Although the pipeline will be encased in concrete, one national security issue flagged for consideration is the exposure and vulnerability of the pipeline in Cook Inlet at low tide that could invite nefarious activity in addition to potential lateral strain that tides may cause to the pipeline. Is there an opportunity for monitoring of the pipeline while submerged as well as surface monitoring at time of low tide?

ANC3-15

CIRI believes the production of LNG and the development of the AKLNG pipeline will be an economic boon to the state of Alaska and will significantly strengthen our nation's energy security. Alaska has a proven track record of successful construction and management of the TAPS, and CIRI believes this project has similar potential for success. As the largest landowner in the Cook Inlet region, CIRI appreciates the opportunity to provide comments, will remain engaged on development stemming from the FEIS, and looks forward to continued consultation, including Section 106 consultation, as appropriate.

ANC3-16

Sincerely,

COOK INLET REGION, INC.

Barbara Donatelli
Barbara Donatelli
Senior Vice President

³ FERC DEIS Pg. F-6.

CC-505

- ANC3-12 Sections 4.5.2.1 and 4.5.3.2 of the final EIS describe the anticipated recovery times for vegetation in the Cook Inlet area. Staff Recommendation No. 11 in section 5.2 of the final EIS requires AGDC to develop and implement an environmental complaint resolution procedure for landowners.
- ANC3-13 Comment noted. AGDC would be responsible for obtaining all permits and approvals required to construct and operate the Project.
- ANC3-14 Comment noted.
- ANC3-15 The pipeline can be monitored for strain through the Cook Inlet crossing by use of inline inspection tools that monitor for pipeline movement and buckling. The pipeline would be designed for an Alternative MAOP, which would require the identification and assessment of threats to the pipeline (49 CFR 192.620(d)(1)). Also, 49 CFR 192.327 provides cover requirements for gas pipelines. If the cover requirements are not met, the regulations require additional protection to withstand anticipated external loads. We recommended, and AGDC has committed to, installing the pipeline at the Cook Inlet shoreline crossings using the DMT continuation method or providing site-specific justification, supported by geotechnical investigations, demonstrating why this method is not feasible. Use of the DMT continuation method would result in deeper burial of the pipeline at the shoreline crossings relative to standard trenching. See the updated discussion in section 2.2.2.2 of the final EIS regarding the status of PHMSA's review of the offshore pipeline design and the discussion in section 4.3.3.3 of the final EIS regarding use of the DMT continuation method.
- ANC3-16 Comment noted.

ANC3 – Cook Inlet Region (cont'd)

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Document Content(s)

AKLNG Comment Ltr.PDF.....1-4

CC-506

ANC4 – Tyonek Meeting

20191113-3012 FERC PDF (Unofficial) 11/13/2019

Note to: FERC Docket No. CP17-178-000

From: Eric Howard, Tribal Outreach Coordinator

Date: November 13, 2019

Subject: Alaska LNG Project – Comments Received on the Draft Environmental Impact Statement

FERC environmental staff conducted a meeting with the Native Village of Tyonek regarding the draft environmental impact statement for the proposed Alaska LNG Project on October 21, 2019. Attached are the comments provided by the participants. These comments will be considered along with other comments received during the preparation of the final environmental impact statement.

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ANC4 - Tyonek Meeting (cont'd)

20191113-3012 FERC PDF (Unofficial) 11/13/2019

Meeting: Alaska LNG Meeting, Tyonek

Date: October 21, 2019 10:00 am (Alaska Daylight Time)

Attendees: Arthur M. Standifer, President
 Brian Peter
 John Standifer, Fish Advisory Board, commercial fisher
 Justin Trenton, IGAP Coordinator
 Eric Howard, FERC
 Patti Trocki, ERM

The purpose of the meeting to afford the Tyonek administration and community members to provide comment on the Alaska LNG Draft Environmental Impact statement and the project in general.

Comments

Cook Inlet marine pipeline crossing:

- Length of pipeline (27.3 miles) | ANC4-1
- Timing of construction – ice-free seasons | ANC4-2
- Construction method and association with shoreline erosion; depth that pipeline is buried is important: micro-tunneling at shoreline (to -35 to -45 MLLW) and pipe lay on the surface of Cook Inlet | ANC4-3
- How many marine vessels per day would be in Cook Inlet during marine pipeline construction? | ANC4-4
- Safety (pipe rupture): engineering issues given plate tectonics | ANC4-5
- Marine pipeline would cross a new crude oil pipeline in Cook Inlet | ANC4-6

Subsistence resources:

- Both terrestrial and marine pipeline construction have the potential to impact marine resources | ANC4-7
- The project crosses game management unit 16B - this is where moose rut and the community is restoring moose habitat | ANC4-8
- The Chuitna River is Tyonek's main salmon stream | ANC4-9
- Subsistence and commercial fishing occur south of Tyonek could be impacted | ANC4-10
- Fur seals are in the vicinity of the proposed marine pipeline construction from early spring to mid-summer | ANC4-11

Wildlife and Marine Mammals:

- A bird sanctuary is located between mileposts 765 and 766 | ANC4-12
- There are less than 300 beluga whales and marine construction would escalate stress to an already stressed population | ANC4-13

- ANC4-1 Comment noted.
- ANC4-2 Comment noted.
- ANC4-3 Comment noted.
- ANC4-4 Marine vessel traffic is discussed in section 4.12.2.3 of the final EIS.
- ANC4-5 Pipeline safety, including from seismic activity, is discussed in section 4.18.10 of the final EIS.
- ANC4-6 Comment noted.
- ANC4-7 Impacts on marine resources from pipeline construction are discussed in sections 4.6.3, 4.7.1, 4.7.2, 4.7.4, and 4.8 of the final EIS. Impacts on subsistence resources are discussed in section 4.14 of the final EIS.
- ANC4-8 Game management unit 16B is included in tables 4.6.1-3 and 4.9.4-2 of the final EIS. Moose calving is discussed in section 4.6.1.3 of the final EIS.
- ANC4-9 The Chuitna River is not crossed by the Project.
- ANC4-10 Impacts on subsistence activities and resources are discussed in section 4.14 of the final EIS.
- ANC4-11 Section 4.6.3 of the final EIS has been updated to address this comment.
- ANC4-12 The Susitna Flats IBA is less than 1 mile from the Mainline Pipeline route between about MPs 765 and 766.
- ANC4-13 Impacts on Cook Inlet beluga whales are analyzed in section 7.4 of the Biological Assessment, which is provided as appendix O of the final EIS.

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- Tyonek would like to offer the company marine mammal observers to monitor construction in Cook Inlet

Alternatives:

- Alternatives should be sought to minimize Cook Inlet crossing length | ANC4-14
- Suggested building the pipeline on land south of Tyonek to McArthur Flats area and then cross Cook Inlet | ANC4-15
- Tribe suggested a crossing north of Tyonek and then across north of Nikiski; the pipeline would be on land down to Nikiski | ANC4-16

Climate Change:

- Marine mammals are coming up further north than normal in Cook Inlet | ANC4-17
- Cook Inlet is so warm that spawning salmon only have a narrow window to swim upriver | ANC4-18
- The project of this size may demonstrate engineering progress but the environmental impacts appear too large for the ecosystem to recover | ANC4-19

Safety:

- What pipeline safety measures will be implemented? | ANC4-20

Job Creation and Employment:

- Are skilled and non-skilled laborers required and will training be provided to local workforce? | ANC4-21

FEIS:

- Arthur Standifer and Justin Trenton would like electronic copies of the Final EIS. | ANC4-22

ANC4-14 Cook Inlet route alternatives are discussed in Section 3.6.1 of the final EIS.

ANC4-15 The comment suggests an alternative route that would extend south of Tyonek to the MacArthur Flats area before crossing Cook Inlet. We considered a similar route for purposes of minimizing impacts on American devil's club, but found that such a route would not do so. Moreover, although such a route would shorten the length of the pipeline in Cook Inlet, it would increase the overall length of the route by about 25 miles and cross the inlet at a difficult location with respect to tides and current conditions. Consequently, we did not include a detailed analysis of this alternative in the EIS.

ANC4-16 See the updates to section 3.6.1.2 of the final EIS regarding the Cook Inlet West Alternative.

ANC4-17 Comment noted.

ANC4-18 Comment noted.

ANC4-19 The expected duration of various ecosystem impacts is addressed in sections 4.1 through 4.8 of the final EIS. While certain resources would experience permanent impacts due to the Project, others would be expected to recover over time.

ANC4-20 Safety measures that would be implemented for the Mainline Pipeline are discussed in section 4.18.10 of the final EIS.

ANC4-21 The workforce requirements for Project construction are identified in section 4.11.1.2. Job training is discussed in section 4.11.2.2.

ANC4-22 These individuals have been added to the Project mailing list.

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