

## Individuals (IND)

### IND1 – Sam Robert Brice

20190916-5001 FERC PDF (Unofficial) 9/13/2019 5:45:25 PM

Sam Robert Brice, Fairbanks, AK.

To Whom It May Concern:

Please see my below comments in support of the recommendation that the Alaska LNG Project, as proposed by the Alaska Gasline Development Corporation, in Nikiski, Alaska be selected as the preferred alternative for the siting of the LNG plant and marine terminal.

- In Alaska the project will reduce greenhouse gas emissions through the use of natural gas versus burning of wood and coal.
- Through potential sales of natural gas to Asian countries this will reduce greenhouse gas and provide a cleaner energy source to a significant portion of the total world population. Asia population is equivalent to 59.76% of the total world population.
- The DEIS states project construction would result in economic benefits throughout Alaska from worker spending, purchases of materials, supplies and taxes.
- Construction of a gas pipeline will supply Alaskans with gas and improve air quality.
- The project will provide Alaskans and Alaska companies with economic opportunities.
- The DEIS finds that with the implementation of best management practices, impacts to wildlife will not be significant.
- The DEIS notes impacts to recreation areas during construction would be temporary and minor.
- DEIS finds the extent of impacts to subsistence activities would vary by community but overall the impacts would be not be significant.
- The DEIS concludes most project impacts would not be significant and would be reduced to minor impacts with the implementation of proposed avoidance, minimization and mitigation measures.
- AGDC's in water activities will follow mitigation measures to minimize impacts to marine mammals and their behavior developed in conjunction with stakeholders, National Marine Fisheries Service and U.S. Fish and Wildlife Service.
- Increased employment opportunities in most industries with particular growth expected in the oil and gas, mining support services, construction, transportation, professional, scientific and technical services. (page 4-604)
- In state delivery of natural gas will improve air quality conditions throughout the state. (Air Quality, Volume 3, page 4-877)
- Connection to the Interior Gas Utility will provide assurance of a long-term, economic energy supply for Fairbanks and North Pole residents, commercial and industrial users.
- The potential for smaller communities along the pipeline to bring affordable, reliable natural gas to residential, commercial and industrial users.
- Interconnection of the main gas pipeline to the existing Southcentral pipeline infrastructure/network will provide assurance of long-term, economic energy supplies for residential, commercial and industrial users.
- Additional in-state natural gas to support new resource development projects.
- Alaska LNG Project will create jobs and provide significant economic opportunity for businesses currently operating in Alaska.

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INDI-1

Comment noted.

CC-796

## IND1 – Sam Robert Brice (cont'd)

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Trucking, marine pilots, tug operators, construction companies, equipment suppliers along with hotels, car rental and in state air carriers. (page 4-604)

- The Alaska Railroad would realize significant economic opportunity in transportation of project related supplies from the Port of Seward to Fairbanks. (page 4-658, pages 4-674 to 4-675)
- Ports in Southcentral Alaska - Seward, Whittier, Anchorage, Beluga, and Nikiski - will see increased revenues and new jobs as the primary points of entry for offloading equipment and materials. (page 4-660, pages 4-663 to 4-666, pages 4-676 to 4-680)
- The Liquefaction Facility will be located in an area that has served as an industrial area for the past 50+ years.
- The Gas pipeline will follow existing the Trans-Alaska Pipeline corridor and the George Parks Highway Right-of Way. From Prudhoe Bay to Beluga, the pipeline route is the same one permitted by the U.S. Army Corps of Engineers, in June 2019, for Alaska Stand Alone Pipeline.

Please let me know if I can provide any further information regarding the above. I'm a lifelong Alaskan born and continue to live in Fairbanks, AK.

Sam Robert Brice  
504 Bennington Drive  
PO Box 84822  
Fairbanks, AK 99708  
samrobert@me.com  
907-978-3000

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CC-797

**IND1 – Sam Robert Brice (cont'd)**

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CC-798

**IND2 – David Manzer**

20190916-5006 FERC PDF (Unofficial) 9/15/2019 5:18:21 PM

David Manzer, Anchorage, AK.  
David Manzer  
5381 Tudortop Circle  
Anchorage, AK 99507  
dmanzer@aklandstatus.com

September 15, 2019

Secretary Kimberly Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426  
<http://www.ferc.gov>

Re: Docket No. CP17-178-000 for the Alaska LNG Project, Comments on Draft Environmental Impact Statement (DEIS) and Support for Siting LNG Plant in Nikiski, Alaska as Preferred Alternative

Dear Secretary Bose:

I am writing to voice my support for the Alaska LNG Project and, in particular, for selecting the Nikiski, Alaska siting of the Alaska LNG plant and marine terminal as the preferred alternative for the Project.

The Alaska LNG Project will have a significant, positive impact of historic proportions on the State of Alaska and the United States. As an Alaska resident of 42 years and small business owner of 31 years I am particularly focused on the astoundingly beneficial economic impacts this Project will bring to our State. Approximately \$7 billion of materials and services will be purchased in Alaska during construction. The jobs numbers are equally huge with direct construction jobs estimated at approximately 11,000 with almost 1,000 jobs in the operations phase of the Project. The indirect benefits are expected to result in another almost 16,000 jobs.

This Project will allow for the commercialization of stranded Alaska North Slope natural gas, including what will certainly be more gas reserves discovered in association with the significant recent oil discoveries on the North Slope. This Project will be a catalyst for increased exploration for gas reserves to supply LNG exports beyond 30 years. That means even more jobs, direct and those that support industry, and more purchases of materials and services in-State and, particularly with materials, across the United States.

The Alaska LNG Project will also be a new source of revenue to the State of Alaska, thus helping to provide long-term support for services to Alaskans, including our most disadvantaged.

The Project will allow for the interconnection of the main gas pipeline with local distribution systems thus providing an economical energy supply for Alaskan residents and commercial and industrial users. The mining industry will benefit from the availability of a clean, reliable

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IND2-1

Comment noted.

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## IND2 – David Manzer (cont'd)

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and cost-effective source of power. The ground and marine transportation industries will benefit from the revenue associated with the transportation of Project-related supplies.

IND2-1

As important as these positive economic impacts are, the environmental impacts from the Project will also be noteworthy, not only within Alaska but across the Pacific with expected impacts in Asia. The Project will reduce greenhouse gas emissions in Alaska by reducing the need for burning coal, fuel oil, and coal. Many commercial operators of heavy equipment and vehicles are expected to convert to natural gas. The potential sales of natural gas to Asian countries will help reduce greenhouse gas emission in an area that includes almost 60% of the world's population and has known air quality problems.

It is also important to note that the Alaska LNG Project DEIS, which is the result of an exhaustive review by your Agency as well as other federal and State of Alaska agencies, and which has resulted in the production of over 150,000 pages of material addressing Project impacts of all stripes, concluded that most Project impacts would not be significant and would be reduced to minor impacts with the implementation of proposed avoidance, minimization and mitigation measures. The DEIS also finds that impacts to wildlife will not be significant with the implementation of best management practices.

Thank you for your consideration of my comments on the Alaska LNG Project DEIS in support of the Alternative for siting the LNG Plant at Nikiski, and in support of this beneficially transformative Project for Alaska and our Nation.

Sincerely,

David S. Manzer  
Anchorage, Alaska

CC-800

**IND2 – David Manzer (cont'd)**

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**IND3 – John Shively**

20190918-5077 FERC PDF (Unofficial) 9/18/2019 1:26:33 PM

John Shively, Anchorage, AK.  
I write to comment on the Draft Environmental Impact Statement for the proposed Alaska LNG Project. I support the development of that project for the following reasons.

The DEIS states project construction would result in economic benefits throughout Alaska from worker spending, purchases of materials, supplies, and taxes.

The construction of a gas pipeline would supply Alaskans with clean energy and improve air quality.  
The project would provide Alaskans and Alaska companies with new economic opportunities.

The DEIS finds that with the implementation of best management practices, impacts on wildlife would not be significant, and would be mitigated.

The DEIS notes impact on recreation areas during construction would be temporary and minor.

In Alaska, the project would reduce greenhouse gas emissions through the use of natural gas. Through potential sales, it would also help reduce greenhouse gas emissions and provide clean energy to a significant portion of the total world population.

The DEIS finds the extent of impacts to subsistence activities would vary by community but overall the impacts would not be significant.

The DEIS concludes most project impacts would not be significant and would be reduced to minor impacts with the implementation of proposed avoidance, minimization and mitigation measures.

AGDC's in water activities would follow mitigation measures developed in conjunction with stakeholders, the National Marine Fisheries Service, and the Fish and Wildlife Service to minimize impacts to marine mammals and their behavior.

Establishment of Local Subsistence Implementation Councils to identify community issues and concerns will help to ensure impacts to subsistence activities are minimal.

Over eight years, 29,100 construction jobs would be created by the project with peak employment during the project's fourth year at 7,620 jobs.

Approximately 980 operation jobs in the Kenai Peninsula Borough, the Municipality of Anchorage and the North Slope Borough would help spur local and statewide economic activity with total annual wages of \$385 million.

Connection to the Interior Gas Utility would provide assurance of a long-term, economic energy supply for Fairbanks and North Pole residents, and both commercial and industrial users.

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IND3-1

Comment noted.

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## IND3 – John Shively (cont'd)

20190918-5077 FERC PDF (Unofficial) 9/18/2019 1:26:33 PM

Smaller communities along the pipeline route could benefit through affordable, reliable natural gas to residential, commercial, and industrial users.

Interconnection of the main gas pipeline to the existing Southcentral pipeline infrastructure/network would provide assurance of long-term, economic energy supplies for residential, commercial and industrial users.

The additional in-state natural gas could support new resource development projects in need of affordable energy.

The transportation of project-related supplies from the Port of Seward to Fairbanks would benefit the economy.

Ports in Southcentral Alaska - Seward, Whittier, Anchorage, Beluga, and Nikiski - would see increased revenues and new jobs as the primary points of entry for offloading equipment and materials.

The proposed liquefaction facility would be located in an area that has served as an industrial area for the past 50-plus years.

The gas pipeline will follow the existing Trans-Alaska Pipeline corridor and the George Parks Highway Right-of-Way. From Prudhoe Bay to Beluga, the pipeline route is the same one permitted by the U.S. Army Corps of Engineers for the Alaska Stand Alone Pipeline.

Thank you for your consideration.

John Shively

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**IND3 – John Shively (cont'd)**

20190918-5077 FERC PDF (Unofficial) 9/18/2019 1:26:33 PM

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**IND4 – Bob Hubbard**

20190923-5094 FERC PDF (Unofficial) 9/23/2019 3:07:36 PM

Bob Hubbard, Fairbanks, AK.  
Could you imagine how this State and the economy would be affected by an 800 mile 42" Arctic Pipeline, a North Slope Gas Treatment Facility, Compressor Stations along the route and the Liquefaction Facility for the sales of our Alaskan Gas.  
As for an 800 mile line, we have all heard for years that the economy isn't right, that the gas prices are too low, and that the project costs are too high. All of these points are what you will see in the planning of a Mega Project with the same ups and downs you will see during the construction phase of a multi-year Mega Project. Alaskans and Alaska need this line to jump start the economy, the State of Alaska is auguring in with the highest unemployment rate in the nation.  
Cleaner more affordable energy would open doors for other Mega Projects in the State by making them environmentally friendly and affordable to run while employing Alaskans in these legacy operations positions for the generations ahead. One direct job, on a large scale project, ripples down to 20 indirect jobs for Alaskans. Think about the money that would be pouring into our economy when the Interior of Alaska isn't paying the high cost of heating for homes, their local businesses and our schools... not to mention the thousands of legacy positions for the operations of these Mega Projects.  
Another reason to market Alaskan Gas overseas is the fact that Alaska LNG could clean up to 80 million tons of Co2 a year. With the fallout from Asia over the North Pacific, it is actually affecting the health of the fish and the Alaskan Fishing Industry as a whole which will get worse before it gets better.  
Fairbanks Alaska is the home of the 52 acre Fairbanks Pipeline Training Center (FPTC), the only training site of this kind in the world, where the pipeline crafts get together to train on the construction of Arctic Pipelines. The FPTC has trained thousands of Alaskans for work in the Oil and Gas Industry, using some instructors from construction of the original TAPS line, these instructors have hundreds of years of experience between them on Arctic Pipelines, rolling that experience to the younger instructors and on to Alaska's men and women that training for their futures and the future of our great state. The sad part about the situation we are all facing is without the work we will be losing our young talent to the lower 48 where the work is booming, they will move away to set up new lives and will not be back.  
With Health, Safety and the Environment being the number one priority for all Alaskans, this line can and will be built efficiently, safely and with the least amount of impact to the environment as possible. We need to stop spinning our wheels here in Alaska while the rest of the world is moving ahead the demand is out there.

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IND4-1

Comment noted.

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**IND4 – Bob Hubbard (cont'd)**

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## IND5 – Genevieve Bell

20190925-5004 FERC PDF (Unofficial) 9/24/2019 7:05:03 PM

Genevieve Bell, FAIRBANKS, AK.  
Thank you for the consideration.

I am an Alaska resident living in Fairbanks, AK. I support the AK LNG project as proposed by the AK Gasline Development Corp.

We here in Fairbanks are looking for not only cleaner air, but cheaper fuel. This project would help deliver both goals. This can also be true on the national and world level.

The HUGE scale of this would immensely benefit our local and state economy, expanding job opportunities. We are talking thousands of jobs, billions of dollars spent just during the construction phase. Operations of the Line will employ other thousands and contribute to our economy.

Most risks are mitigated and the positives far outweigh the negatives.

If Alaska is going to stay a viable, active state we need to continue to responsibly develop our natural resources. We want a healthy state to work and raise families, and that cant exist without work.

Looking forward to FINALLY having an Alaska Gas line.

Sincerely,

Genevieve Bell

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IND5-1

Comment noted.

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**IND5 – Genevieve Bell (cont’d)**

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**IND6 – Shawn Lowry**

20190925-5123 FERC PDF (Unofficial) 9/25/2019 4:09:23 PM

Shawn Lowry, North Pole, AK.  
9/25/19

I am writing today in support of the Alaska LNG Project. I support the recommendation that the Alaska LNG Project, as proposed by the Alaska Gasline Development Corporation, in Nikiski, Alaska be selected as the preferred alternative siting of the LNG plant and marine terminal. The Alaska LNG project will benefit Alaska, Alaskans and the world on such a positive scale that it cannot be ignored and should not be shelved. The first benefit will come to Alaskans in the form of Jobs. Thousands of constructions jobs during the projected eight year construction phase, followed up with close to one thousand full time operations jobs upon completion will spark and drive the state and local economies. Direct Jobs will provide livelihood and necessities for Alaskan families as well as impact other industries in the creation of indirect jobs. Jobs are good for the economy and I strongly support this project on the merits of job creation and the economic drivers therein. Another benefit will be the delivery of natural gas to the state. The interior and remote Alaska will benefit from improved air quality and reduced energy costs of heating living and commercial spaces. With clean inexpensive energy economies will grow providing increased opportunities for new resource development as well. This is a win-win situation. In addition to creating jobs, improving air quality and increasing economic activity the State will benefit from marketing and distributing natural gas to Asian and world markets. There is sufficient evidence that this project, in its entirety can be managed and developed with minimal impact to the environment and wildlife and should be moved forward with all haste.  
Thank you.

Sincerely,

Shawn D. Lowry  
2358 Keeney Rd  
North Pole, AK. 99705

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IND6-1

Comment noted.

CC-809

**IND6 – Shawn Lowry (cont'd)**

20190925-5123 FERC PDF (Unofficial) 9/25/2019 4:09:23 PM

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CC-810

**IND7 – Jeff Fellas**

20190927-5002 FERC PDF (Unofficial) 9/26/2019 6:12:02 PM

Jeff Fellas, Fairbanks, AK.

Hello I am would like to see this project go through has I'm an Alaskan resident and we need an alternative source of fuel plus the amount of work it would create would help the economy of Alaska.

Thanks,  
Jeff Fellas

IND7-1

IND7-1

Comment noted.

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**IND7 – Jeff Fellas (cont'd)**

20190927-5002 FERC PDF (Unofficial) 9/26/2019 6:12:02 PM  
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CC-812

## IND8 – Mike Huhndorf

20190930-5035 FERC PDF (Unofficial) 9/29/2019 9:31:59 PM

September 29, 2019

Mike Huhndorf  
P. O. Box 2527  
Kenai, Alaska  
99611

DOCKET # CP17-178-000

Hello,

In regards to the proposed pipeline Route C2 in Nikiski, must industry needlessly wreck yet another piece of the environment? This is especially egregious in that a perfectly working route already exists and has served the needs of the Alaskan economy for over 60 years. Admittedly, the oil industry needs it place in any setting where resource extraction is in process. However, that place is already established and set in place. Why rip another slash through an environment that is sensitive to the operation required for operation and maintenance? This land parcels in the Suneva Lake area are better suited for other purposes, notably residential and recreational.

In closing, I ask that this proposed route pipeline be redirected to the prior established West Alternative.

Regards,

Mike Huhndorf

IND8-1

IND8-1

Comment noted.

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**IND8 – Mike Huhndorf (cont'd)**

20190930-5035 FERC PDF (Unofficial) 9/29/2019 9:31:59 PM

Document Content(s)

FERC letter 9-29-19.DOCX.....1-1

CC-814

**IND9 – Peter McKay**

20190927-5016 FERC PDF (Unofficial) 9/26/2019 11:50:49 PM

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

From: Peter E. McKay  
55441 Chinook Rd.  
Kenai, AK 99611

Date: September 23, 2019

Subject: Public Comments to Docket CP17-178-000 – Nearshore Mapping

I recommend the Project develop detailed maps of the proposed Nikiski nearshore pipeline route (the West Alternative) and the Beluga nearshore approach locations. The Pipeline Marine Shallow Geotechnical Report, USAP-FG-GRZZ-10-002016-011, Rev.0, 8-Sep-16 (This Geotechnical report was included in the response to FERC’s 10-02-2018 Letter Request 034, AGDC No. RFI-561-FERC-034-2 does not adequately address the subsea conditions in the proposed nearshore approach locations. A determination about the suitability of the potential nearshore pipeline routes and installation methods cannot be made with confidence. One important conclusion the Geotechnical report reached after analyzing the borings is that: “shallow subsurface materials are extremely variable in both the vertical and horizontal plane.”

IND9-1

IND9-1

Sections 3.6.1.2 and 4.3.3.3 of the final EIS have been updated to address this comment.

The following is taken from the Pipeline Marine Shallow Geotechnical Report Section 6.

IND9-2

IND9-2

Comment noted. See the updates to sections 3.6.1.2 and 4.3.3.3 of the final EIS.

*“6.0 RECOMMENDATIONS FOR FURTHER SITE INVESTIGATION AND LABORATORY TESTING*

*6.1 General - Given the high variability of the shallow soil conditions along the proposed pipeline routes, there are several recommendations for further site investigation and laboratory testing. These are described below.*

*6.2 Testing for Trenching Studies The pipeline is planned to be trenched with 6 ft of cover in water depths to 41 ft. Given the variability in soil conditions (generally lean to fat clay, with some silt, sand and gravel in the northern pipeline shore crossing areas, and lean clay and sand with gravel in the southern shore areas near Nikiski), there may be several options considered for trenching and backfilling, e.g., post-lay jet-trenching, pre or post-lay plowing, or pre-lay dredging. The soil conditions, such as the undrained shear strength of clay and angle of internal friction of sand, can affect the efficiency of various methods and equipment selection. It is also important to consider the impact of the trenching method on the backfill conditions, if lateral and/or vertical stability of the pipeline is a concern. For example, jetting will tend to soften and remold fine-grained soils while plowing will tend to reduce the amount of soil softening and, therefore, allow for increased backfill soil strength. It is recommended to perform additional*

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**IND9 – Peter McKay (cont'd)**

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advanced strength and consolidation testing on the soils along the trenched locations in order to further quantify:

- Intact shear strength using cone penetrometer to assess trenching methods and equipment selection,
- Remolded shear strength testing on remolded and reconsolidated (to various levels of reconsolidation) soil samples in a triaxial apparatus to assess initial and time-depenent backfill strength, and
- Consolidation testing using oedometer to assess time-dependent strength recovery from installation to operation.

6.3 Testing for Pipe-Soil Interaction Studies - Beyond the trenched sections, the pipeline will remain on the seabed surface relying on primary stabilization for on-bottom stability. Several tested locations along the pipeline routes indicate fine grained materials including clays and silts. To accurately quantify the soil resistance to lateral and axial pipeline movement, it is important to quantify the shear strength characteristics of the near surface soil and the pipe-soil interface under the appropriate stress, roughness and loading conditions.”

I endorse the report recommendations and conclusions. These recommendations are not limited to the Nearshore Pipeline. The report recommends the full mainline route for the Cook Inlet subsea bottom crossing also have further site investigation and laboratory analysis.

The Pipeline Marine Shallow Geotechnical Report, USAP-FG-GRZZ-10-002016-011, Rev.0, 8-Sep-16 does not address the Direct Micro Tunnel (DMT) Continuation method of nearshore pipeline installation. FERC has recommended the Project investigate the DMT nearshore pipeline installation method combined with traditional open trench offshore installation methods. The DMT Continuation pipeline installation technique may have an additional benefit in that it may improve resistance to axial and lateral pipeline movement and may help provide increased stability to the offshore pipeline that is laid on the seafloor.

In addition to additional core samples, please consider requiring the project to conduct ground penetrating radar or other sub-surface mapping techniques specifically designed to identify large sub-surface rocks and boulders in the proposed nearshore pipeline approach routes at depths below the seafloor of up to ~30'-50' as necessary. This pre-work could improve the probability of success of the DMT Continuation nearshore pipeline installation method.

I urge the Commissioners to require the Project to conduct detailed bottom and sub-surface surveys on the Cook Inlet nearshore approaches – Beluga and the West Alternative (Nikiski Bay) - to help guide the decision on the precise nearshore pipeline routes and installation method(s). **The Nearshore pipeline installation routes and technique is a critical but as-yet unresolved part of the Project.** This is one of the more important parts of the critical path for the Project.

I urge the Commissioners to ask the Project to promptly resource the detailed mapping of the nearshore approaches so that results/data can be analyzed and published for public comment.

IND9-2

IND9-3

IND9-4

IND9-3

Comment noted. See the updates to sections 3.6.1.2 and 4.3.3.3 of the final EIS.

IND9-4

Comment noted. See the updates to sections 3.6.1.2 and 4.3.3.3 of the final EIS.

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**IND9 – Peter McKay (cont'd)**

20190927-5016 FERC PDF (Unofficial) 9/26/2019 11:50:49 PM

Document Content(s)

McKay Comments CP17-178 Nearshore Mapping.PDF.....1-2

CC-817

# IND10 – Barbara and Ross Njaa

20190923-5147 FERC PDF (Unofficial) 9/23/2019 4:30:45 PM

Barbara and Ross Njaa, Nikiski, AK.  
September 21, 2019  
In reference to Docket #CP17-178-000  
- the LNG pipeline route exit of Cook Inlet

To members of Federal Energy Regulatory Commission;

As residents of the Boulder Point neighborhood, my husband and I are against the proposed LNG route exiting Cook Inlet east of Boulder Point. Overall, we stand united with our neighbors in supporting the oil industry and fisheries which provide the livelihood for most of our region. However, we are strongly opposed to the LNG pipeline's C2 route. This route will result in unnecessary destruction of longtime rural lifestyles and the character of the land itself. We ask that FERC adopt the Western Alternate route, which would exit the Inlet about 5 miles west of the C2 route in an area already used by the oil industry.

In the distant past, Alaskan native peoples lived here, and we've occasionally found proof. It is no surprise, for the area has plenty of wild plants to go with the Cook Inlet hooligan, herring, and salmon. The settlers here in the 1940's and 50's still have family members living and fishing commercially as set netters on the beach. The area is still fairly remote, requiring those who live here to plow themselves out in the winter- or ski, as my husband and I did back in the '80's. Our neighbors are supportive of each other, yet independent. We all love the tranquility and loneliness, and the wildlife that wanders through our yards. We and our neighbors put salmon away for winter, and my husband hunts in the Boulder Point area. On a good year, we add moose to our supplies. In all years, we gather wild greens, mushrooms, tea for storing ... and devil's club stickers to fester through our jeans. In the past, 'living off the land' as much as possible was a necessity; now it is a preference and a way of appreciating what the land offers.

If the LNG pipeline were to exit on the beach below our home, it would first permanently disrupt family fishing operations, then level an entire hill for a staging area. Three neighbors would find themselves able to watch from their homes the comings and goings of helicopters and personnel instead of the wanderings of bald eagles and black bears. The pipeline would continue over land, crossing the Suneva Lake drainage (which I watched tear out a gully as the lake drained entirely in the 70's) and then an entire untrammled region of lakes, alders, and steep hills. Much of Nikiski has been used by service companies and oil companies for decades, but this rural community is beyond the industrialized area. It is a shame to despoil this pristine area when the Western Alternate Route is both shorter, less expensive, and terminates in an already industrialized area.

The Boulder Point community is a collection of families with roots preceding statehood as well as newcomers drawn to wild areas. It is the longtime home for many and the wilderness dream for others in our rural community. We have all grown to love it that way. We ask that FERC

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IND10-1

See the updates to section 3.6.1.2 of the final EIS.

CC-818

**IND10 – Barbara and Ross Njaa (cont'd)**

20190923-5147 FERC PDF (Unofficial) 9/23/2019 4:30:45 PM

Commissioners, after careful consideration, choose the Western Alternate route for the proposed LNG pipeline. It is not only the most cost-effective and environmentally sound option, but it protects the lifestyle of those who live, hunt, fish, and forage in the Boulder Point area. Thank you.  
Sincerely,

Barbara and Ross (Buff) Njaa

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CC-819

**IND10 – Barbara and Ross Njaa (cont'd)**

20190923-5147 FERC PDF (Unofficial) 9/23/2019 4:30:45 PM

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CC-820

## IND11 – Peter McKay

20190924-5107 FERC PDF (Unofficial) 9/24/2019 4:05:48 PM

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

From: Peter E. McKay  
55441 Chinook Rd.  
Kenai, AK 99611

Date: September 23, 2019

Subject: Public Comments to Docket CP17-178-000 – Section 4 Environmental Analysis

Date: 09-24-2019

In DEIS Environmental Analysis, *Section 4.1.3.10 Impacts and Mitigation* on Page 4-46:

FERC STAFF RECOMMENDED MITIGATION:

*“Prior to the end of the draft EIS comment period, AGDC should file with the Secretary an analysis of the potential hydrologic hazards at Suneva Lake and how the Mainline Pipeline would be engineered and constructed (i.e., using deep burial, channel protection, heavy wall pipe, etc.) in the area through Suneva Canyon to avoid impacts on the pipeline if a dam breach should occur.”*

On 09-18-19 AGDC responded with a document titled Draft EIS Volume No. 3, Draft EIS Section No. 5.2, Mitigation No. 20, AGDC ID No. SR-020.

The AGDC response on Page 1 states: *“Based on the potential scour from a worst-case scenario at the pipeline crossing location AGDC proposes to use a deeper burial and protective ditch measures at the Suneva Creek canyon crossing location to avoid potential impacts. Specific crossing engineering details will be developed during detailed design. If additional investigation determines the presence of bedrock within the predicted scour zone beneath the streambed, the scour analysis will be revisited with the additional information.”*

This response does not make me happy and it should not make the Commissioners happy either. “Specific crossing engineering details will be developed during detailed design.” I think that more time and effort should be put into the engineering details now - prior to approval of this pipeline route C2 or the DEIS. AGDC appears to be kicking this can down the road. Other mainline waterbody crossings with hydrological threats have more detailed design submitted to

IND11-1

IND11-1 Comment noted.

CC-821

**IND11 – Peter McKay (cont’d)**

20190924-5107 FERC PDF (Unofficial) 9/24/2019 4:05:48 PM

mitigate recognized pipeline hazards. This threat to pipeline integrity needs to be mitigated up front.

In the AGDC response I found and carefully reviewed the “Suneva Lake Pipeline Crossing Scour Analysis” and Section 2.2. “Suneva Lake Volume Determination”.

I note that this is a preliminary study with many “estimated” values. Although over-estimations with conservative values are frequently used – the basis for the conclusion of the outflow scour values are necessarily best guess estimates.

The accuracy of Scour Analysis would benefit from increased use of empirical field gathered data. I ask the Commissioners to require AGDC to gather actual hard data for lake volume (area and depth) and that core samples be obtained to determine the soil composition of the Suneva Lake dam and outflow canyon especially in the proposed pipeline crossing area. This data can then be used with confidence in the critical hydrological hazard calculations.

In the AGDC response – “Suneva Lake Pipeline Crossing Scour Analysis” and Section 3. “Scour Analysis” - to this FERC request I do not find evidence that consideration was given to the possibility of ice on the lake. The presence of ice may reduce the volume of water available to flow in certain seasons – but at other seasons ice and snow loading may add to the Suneva Lake water outflow calculations.

in the event of a fall/winter/spring catastrophic dam breach:

1. Would the presence of lake ice increase the scouring effects (and hazard to the pipeline) when the chunks of ice are combined with the lake water outflow?
2. Would the presence of lake ice on the surface increase the water pressure/flow available at the dam and downstream at the pipeline crossing?
3. Would there be a possibility that a large sheet of ice that could shift down the lake outlet/canyon and impact the pipeline and threaten its integrity?

Complex modeling will be required to fully consider the potentially additive ice effects on canyon and possibly damaging pipeline scour effects.

The summer of 2019 was exceptionally dry in Nikiski. Suneva Lake levels were very low in late July and August when AGDC field work was completed. This fact should be included in the “worst case” Lake volume calculations, inflow/outflow considerations and scour analysis.

In my opinion – the AGDC “Suneva Lake Pipeline Crossing Scour Analysis” does not meet the requirements for FERC Staff Recommended Mitigation No. 20.

IND11-2

IND11-2 See the updates to section 4.1.3.10 of the final EIS.

IND11-3

IND11-3 See the updates to section 4.1.3.10 of the final EIS.

IND11-4

IND11-4 See the updates to section 4.1.3.10 of the final EIS.

IND11-5

IND11-5 Comment noted.

CC-822

**IND11 – Peter McKay (cont'd)**

20190924-5107 FERC PDF (Unofficial) 9/24/2019 4:05:48 PM

The need to complete an accurate Suneva Lake hydrological hazards study can be eliminated by choosing the "West Alternative" pipeline route. This route has been proposed by Nikiski residents of the Suneva Lake/Boulder Point neighborhood. The "West Alternative" pipeline route revision has a nearshore approach that arrives a few miles South-West of Suneva Lake in Nikiski Bay - which is an industrial area. The West Alternatives route also mitigates the potential conflicts with my residential neighborhood.

IND11-6

IND11-6 See the updates to sections 3.6.1.2 and 4.1.3.10 of the final EIS.



**IND11 – Peter McKay (cont'd)**

20190924-5107 FERC PDF (Unofficial) 9/24/2019 4:05:48 PM

Document Content(s)

McKay Comments CP17-178 Suneva Lake.PDF.....1-3

CC-824

## IND12 – Peter McKay

20190925-5021 FERC PDF (Unofficial) 9/24/2019 8:58:25 PM

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

From: Peter E. McKay  
55441 Chinook Rd.  
Kenai, AK 99611

Date: September 24, 2019

Subject: McKay Comments Docket CP17-178 Route C2 Process

I am writing about the DEIS process. There was a significant pipeline route change that occurred after the Open House, Notice of Intent publication and the Scoping period. In my opinion this route revision should have caused AGDC to re-evaluate and fall back to notice the affected parties. I understand that route revisions happen. However when revisions do occur AGDC and FERC must have and follow a process to circle back to inform the (affected) public and capture their concerns and opinions. This process has does not appear to have functioned properly - as far as the pipeline Route C2 revision goes.

The pipeline route C2 "Suneva Lake" nearshore pipe crossing revision has not gotten the scrutiny or public engagement that other segments of the route have gotten. When the AKLNG presentations about the proposed pipeline route were made at the pre-filing engagement (open house), and scoping sessions the proposed pipeline route shown did not include the Route C2 through our neighborhood.

During the pre-filing process, AKLNG held 14 open houses in Nikiski, Tyonek, Anchorage, Healy, Nenana, Minto, Barrow, Fairbanks, Trapper Creek, Wasilla, Houston, Nuiqsut, Kaktovik, and Anaktuvuk Pass, Alaska, from October 2014 through January 2015. The purpose of the open houses was to provide the public with information about the Project and to solicit comments. The revision of the Nikiski shore landing at Suneva Lake - Route C2 through my neighborhood was not part of the route presented.

What followed was a NOI regarding the intent to prepare a Draft Environmental Impact Statement (DEIS). The NOI established a 9-month public scoping period for the submission of comments, concerns, and issues related to environmental aspects of the Project.

DEIS Page ES-2 "Public Involvement" states: *"The NOI was sent to over 1,850 interested parties, including federal, state, and local officials; agency representatives; conservation organizations; Native Alaskan communities; local libraries; newspapers; and property owners along the pipeline route and within 0.5 mile of the planned compressor stations and LNG Plant."* Because

IND12-1

IND12-1

While the proposed Mainline Pipeline route was modified after the issuance of the NOI, residents of the Boulder Point area were included on the mailing list for the NOI given their proximity to the then proposed route and/or alternative routes under consideration at that time. The mailing list for the NOI used an alternate address for the commenter; therefore, we are unable to verify that the commenter received the NOI. The commenter's address was updated for all subsequent mailings associated with the Project. We note that the commenter filed written comments on the Project during the scoping period and spoke at the scoping meeting held on October 27, 2015 in Nikiski, Alaska.

CC-825

## IND12 – Peter McKay (cont'd)

20190925-5021 FERC PDF (Unofficial) 9/24/2019 8:58:25 PM

nearshore pipeline route C2 (the Suneva Lake Option) had not yet been proposed by the Project – many affected parties in my neighborhood (apx. 8-10 families) who live within 0.5 miles of the proposed C2 pipeline route did not get the Public Involvement Notice of Intent.

IND12-1

During the scoping period, FERC held 12 public scoping meetings to receive comments about the Project. The meetings were attended by about 310 people, including stakeholders, representatives from FERC, cooperating agencies, and AGDC. During scoping, FERC staff gathered feedback from local communities, including residents, elected officials, tribal leaders, community leaders, and other interested stakeholders. The C2 route revision was not part of the public scoping meetings in 2016 presentations to the Nikiski community.

I believe that AGDC first presented the route C2 “Suneva Lake” revision in Resource Report 10 Alternatives - on April 14, 2017.

My affected neighborhood in the Suneva Lake and Boulder Point area of Nikiski were denied several important parts of the due process.

Myself and several neighbors have raised several objections to the proposed route and offered a constructive nearshore route alternative (West Alternative which would have the pipeline come ashore in Nikiski Bay).

IND12-2

IND12-2 See the updates to section 3.6.1.2 of the final EIS.

The Route C2 segment where the gas pipeline is currently planned to come ashore in Nikiski at Suneva Lake seems to be the single most controversial segment of the gas pipeline route. This segment has the most acute conflict between the community and the pipeline interest.

We have asked numerous questions (in FERC submittals) about the proposed Suneva Lake pipeline shore landing site. There appears to be a large industrial development planned for my neighborhood. This may include a large work area where pipe would be stored and fabricated into lengths that will be installed in the nearshore and pipeline crossing. This *may* also include a man-camp where workers would be temporarily housed. Also proposed are a Main Line Block Valve (MLBV) and heliport.

IND12-3

IND12-3 Comment noted.

To date the Project has not made a presentation directly to Nikiski and my neighborhood that focuses on the nearshore aspect of the proposed route C2 pipeline project to our community.

The DEIS comment period is closing and it is unfortunate (and discriminatory) that my family and my neighbors just do not know what the Project has planned for our community. This information is supposed to be provided at Pre-filing or Scoping meetings. Our many questions are unanswered.

Because pipeline route C2 was not included in the open house, not noticed as part of the NOI and not included in the scoping meetings. I request that we are offered these opportunities.

IND12-4

IND12-4 See the responses to comments CM3-1, CM3-7, and IND12-1.

I ask FERC and the Project to meet with Nikiski residents and our local community to review the currently planned Suneva Lake Route C2 nearshore development. The community must be afforded the same opportunity to be provided with information and to discuss our concerns

## IND12 – Peter McKay (cont'd)

20190925-5021 FERC PDF (Unofficial) 9/24/2019 8:58:25 PM

about Route C2 that were offered to participants in the pre-filling open house. “The purpose of the open houses was to provide the public with information about the Project and to solicit comments.”

IND12-4

We then ask that FERC and the Project for a follow-up meeting with the community most affected by this route revision to review the comments and concerns that develop after the open house meeting. There should be another scoping meeting to gather feedback from local communities, including residents, elected officials, tribal leaders, community leaders, and other interested stakeholders – specifically about pipeline route C2 and the nearshore approach.

I request that the Commissioners take action to remedy this failure to fully engage the public on the route C2 revision. This must be resolved promptly - certainly prior to a final EIS determination for the project.

CC-827

**IND12 – Peter McKay (cont'd)**

20190925-5021 FERC PDF (Unofficial) 9/24/2019 8:58:25 PM

Document Content(s)

McKay Comments CP17-178 Route C2 Process.PDF.....1-3

CC-828

**IND13 – Pamela Miller**

20190926-5001 FERC PDF (Unofficial) 9/25/2019 8:16:55 PM

PAMELA A MILLER, Fairbanks, AK.  
Dear FERC,

I wish to request an extension of the public comment period and also request that a full, proper public hearing be held in Fairbanks.

IND13-1

IND13-1

See the response to comments CM3-1, CM3-7, and CM6-4. Also, as indicated in the notice announcing the meetings, there are other ways to provide comments on the proceeding in addition to the public meetings. Written comments mailed to the Commission and those submitted electronically are reviewed by staff with the same scrutiny and consideration as the verbal comments given at the public comment meetings. Therefore, you do not need to attend a meeting in order for your comments to be considered.

I tried to attend the Fairbanks, Alaska public hearing on the Alaska Gasline Development Corporation Alaska LNG project which was announced for Sept 11, 2019 to be held from 5-8pm at the Morris Thompson Cultural and Visitors Center (84 FR 149 pp 37857, Aug 2, 2019). Due to other commitments, I arrived at 6:45 pm, but was told by staff from the Center that the FERC officials had left by 6 pm. He also mentioned that others had come prior to me but after FERC officials had left. I was not able to provide oral testimony nor to ask any questions of FERC officials. Therefore, because FERC did not live up to its advertised hearing times, myself and others were unable to comment.

IND13-2

IND13-2

Cumulative impacts, including those associated with the Ambler Road project, are analyzed in section 4.19 of the final EIS.

I am concerned about the complex nature of this project proposal, cumulative impacts with other industrial projects currently under environmental review including the Ambler Road which also depends on the Dalton Highway corridor, and rapidly increasing climate warming, permafrost melt, etc. that will affect the industrial and road facility integrity and also add to greenhouse gas emissions at a time when we need to reduce them drastically.

IND13-3

IND13-3

See the responses to comments CM3-1, CM3-7, and CM6-4.

This Alaska Gasline project Draft EIS review of 2,800 pages of documents is complex, and the time period for review was already too short. I heard from others who attended the hearing near Denali National Park that FERC or others did not have basic summary information or maps available for reference in public discussion.

IND13-4

IND13-4

Section 1.3 of the final EIS describes the public review and comment process for the Project. See also the response to comment CO1-1.

At this time most Alaskans may not be focused on this project because after many decades of review of various North Slope (Prudhoe Bay) gaslines proposed, they doubt this project is actually going to move forward. However, if it does, the public needs fair and adequate public hearings and comment periods. It appears that even the development proponent (ADGC) does not have a viable project at this time, with no contracts or agreements of gas supply from North Slope, nor contracts of buyers in the export market. In the news, it indicates that this project permit is sought to simply be held until later. Therefore, there is no need established for the project.

IND13-5

IND13-5

The sale of BP's assets to Hilcorp LLC is beyond the scope of the EIS.

There is substantial new information that FERC should consider which has bearing on the viability of the project as well as the analysis of human and environmental impact, including:  
1) BP's recently announced sale of all its assets on the North Slope to Hilcorp LLC. What existing infrastructure liabilities from BP's existing facilities that are necessary components for gas supply, access, etc. will need to be better evaluated with respect to ultimate DR&R (dismantling, removal and rehabilitation - including environmental restoration of lands, habitats, and waters)?

CC-829

**IND13 – Pamela Miller (cont'd)**

20190926-5001 FERC PDF (Unofficial) 9/25/2019 8:16:55 PM

2) The differences in state property tax, production taxes, and other financial and social factors should be addressed of BP and Hilcorp. Therefore, I wish to request that FERC extend the comment deadline 30 days past the closing date or 30 days after the state project team submits the last of detailed information requested by FERC, whichever is later.

IND13-5

3) The piggy-backing of this EIS with the ASAP project, which was a different size pipeline, different route in places, and different goals (ie one focused on Alaskan use, the other LNG export) is very confusing and does not result in the public knowing exactly what information gaps remain.

IND13-6

I will provide more detailed comments later.

At this time, I request that FERC extend the comment deadline 30 days past the closing date or 30 days after the state project team submits the last of detailed information requested by FERC, whichever is later.

IND13-7

Sincerely,

Pamela A Miller

IND13-6      Comment noted. We conducted an independent analysis of the information provided throughout the environmental review process and made our own conclusions based on that information.

IND13-7      See the responses to comments CM3-1, CM3-7, and CM6-4.

**IND13 – Pamela Miller (cont'd)**

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CC-831



**IND14 – William and Mary Bookout**

Comments to Federal Energy Regulatory Commission (FERC)

Docket Number: CP17-178-000

Date of Submission: 25 September 2019

Comments Submitted by:

William & Mary Bookout  
48622 Nikiski REM NW  
Kenai, AK 99611  
Boulder Point Area and Property Owners Immediately Adjacent to the Proposed Pipeline  
Route – East Side

Comments at Public Meeting, Nikiski Recreation Center, 9-11-2019  
and Submitted to the Docket as a Matter of Public Record

Thank you for the opportunity to comment on the Environmental Impact Statement published in June 2019 for Docket No. CP17-178-000.

My name is Bill Bookout and I speak on behalf of my wife, Mary Bookout and I who own the property with the address assigned by the Borough at:

48622 Nikiski REM NW, Kenai, AK 99611

Specifically, our property is located just to the West of the Property owned by Peter and Debbie McKay and immediately adjacent to the proposed pipeline landfall from the Cook Inlet onto Boulder Point.

In summary, our property, lives and personal rights will be significantly disrupted and infringed along with many friends and neighbors in the Boulder Point residential area should this project be allowed to continue as proposed. | IND14-1

For the record, I will also state that we are not against responsible energy development as various projects provide benefits to both our state and our nation. This project however does not fulfill these objectives and the published Draft EIS not only significantly minimizes the local impact, this project will result in permanent and unrecoverable damage to the environment, detrimentally affecting Alaska Wildlife, and contains factual inaccuracies. | IND14-2

Due to limited time I will only list a few examples:

- 1. As documented on page 194, at minimum, Black Bear and Moose will be permanently impacted due to loss of both habitat and permanent loss of forage as Devil's Club requires shaded areas to thrive. Even with reclamation, cover would never be restored. | IND14-3

IND14-1 See the response to comment CM4-7.

IND14-2 See the response to comment CM4-8.

IND14-3 See the response to comment CM4-9.

CC-832

**IND14 – William and Mary Bookout (cont'd)**

Further on page 466 – 470 of your draft, it is noted that, among other things, “Impacts on forest communities would be significant given the quantity of additional forest vegetation that would be removed through construction clearing ...”

IND14-4

IND14-4 See the response to comment CM4-10.

2. In addition to the mainline right of way AGDC is requiring additional land in many areas. One of these requests includes more than 10 acres for preparation, staging, possible living quarters, Helipads etc. immediately behind our specific property. I call your attention to the example given of an existing Pipeline Approach to Cook Inlet at Beluga, AK. Potentially this is the view we would have directly from our Bedroom Window. This is specifically noted in the draft EIS on page 1192 noting “Operational Traffic Noise” which would be significant during the project and continue for maintenance and monitoring in perpetuity.

IND14-5

IND14-5 See the response to comment CM4-11.



3. I had the opportunity to accompany our neighbor Byron Nalos and his son Spur while they fished one day a few weeks ago. While compensation may be offered for impact and loss of income due to the disruption of fishing operations, there is no financial measurement that can adequately compensate the impact I personally observed to the families raising their kids and teaching them about the values of this lifestyle which is uniquely Alaskan. The effects in a child's formative years cannot be measured by money. These values and heritage are among the reasons we choose to live in this area.

IND14-6

IND14-6 See the response to comment CM4-12.

**IND14 – William and Mary Bookout (cont'd)**



CC-834

- 4. The project as proposed requires requests for unneeded and unreasonable right of way, of 145 feet, some of which are noted in table D-3 which are particularly impactful to the residents of this area. In the draft EIS, FERC has denied that request and stated the project remain within a 75' right of way. This is simply not possible in our extremely steep terrain. Therefore, if the project were to go through our area this would appear like an interstate highway through pristine Alaskan terrain. Comparatively remaining within the Cook Inlet for 2 additional miles would avoid over 5 miles of permanent destruction. | IND14-7
  
- 5. I call your attention to comments beginning on page 874 where it is stated that, "The mainline facilities would primarily follow designated utility corridors to avoid residential communities." I suggest for those of us who live here this statement is simply factually incorrect. And, I assure you that if any one of you lived in our community you would feel the same way. I also want to state for the record that the location of our well should be specifically noted along with the specific location of our residence. We are one of the families most impacted in all respects; including property values as well as our rights to personal and peaceful enjoyment. | IND14-8  
| IND14-9  
| IND14-10

IND14-7 See the response to comment CM4-13.

IND14-8 See the response to comment CM4-14.

IND14-9 See the response to comment CM4-15.

IND14-10 See the response to comment CM4-16.

**IND14 – William and Mary Bookout (cont'd)**

In summary and conclusion, my wife and I looked for property to buy on the Kenai Peninsula for over 2 years. On our way to view the property we now have while driving to Nikiski when we saw the Agri-Chem Plant I said to my wife, "this doesn't look too promising to me." While the areas to the immediate west of Nikiski are very industrialized, the area from Nikiski east toward Captain Cook State Park are what Alaska is, pristine and coexisting with residents that live, work and retire here as part of living the American Dream.

The viable "West Alternative" that has been presented allows for the completion of the project, meeting the objectives of all stakeholders and preserves the area of Boulder Point and the surrounding affected areas pristine and uniquely Alaskan, which is why we choose this specific area to live and retire. | IND14-11

IND14-11      Comment noted.

If needed I assure everyone that I will help lead efforts to elevate this issue to the appropriate levels of elected officials and Alaskan voters.

I believe the larger question is this; if this project proceeds forward and as opposed to the viable "West Alternative" that has been presented, the injustice and negative impact to the residents in our community, can also happen in other areas of the State as well. This is not merely a local issue; it should be a concern of everyone who lives in this great state. | IND14-12

IND14-12      Comment noted.

Thank you for the opportunity to comment.

Sincerely and Respectfully,

  
William Bookout

  
Mary Bookout

CC-835

**IND14 – William and Mary Bookout (cont'd)**

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CC-836

**IND15 – Robert Stinson**

20190930-5158 FERC PDF (Unofficial) 9/30/2019 3:18:17 PM

ROBERT STINSON, Anchorage, AK.  
September 30, 2019  
Federal Energy Regulatory Commission  
Ms. Kimberly D. Bose  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Subject: Alaska LNG Project Draft Environmental Impact Statement,  
FERC Docket Number CP17-178-000

Dear Ms. Bose:

The Alaska Gasline Development Corporation (AGDC) is requesting authorization to construct a Liquefied Natural Gas Pipeline System from Alaska's North Slope to South Central Alaska commonly known as the Alaska LNG Project. I am writing in support of AGDC's Draft EIS. My company, Price Gregory International, has been in the business of building pipelines in North America since the 1920's. We built Section 3 of the Trans-Alaska Pipeline in the mid 70's and have been building pipelines for the Alaska oil and gas industry ever since. We have built below ground and above ground gas pipelines on the North Slope of Alaska in permafrost that are in operation today and performing to their original design.

I support all the provisions for constructing the Alaska LNG Project as outlined in the DEIS, in particular, the preferred alternative for siting the LNG Plant and Marine Terminal in Nikiski, Alaska. Another provision I support is the preferred route of the Pipeline from Prudhoe Bay to Beluga following the existing Trans Alaska Pipeline corridor and the Parks Highway ROW which is the same route approved by the Army Corps of Engineers, in June of 2019 for the Alaska Stand Alone Pipeline.

The benefits of the Alaska LNG Project far outweigh the negative impacts to the environment during construction and operation. Besides the obvious economic benefits to Alaska citizens, businesses and communities, the Project will reduce greenhouse gas emissions, not only in Alaska but more importantly in the Asian countries that will receive Alaska gas. Natural gas will replace the dependency on wood and coal in emerging economies and fuel oil in other developing countries, helping reduce carbon emissions worldwide.

The DEIS has found that impacts to wildlife, subsistence and recreation activities will not be significant with the proper implementation of avoidance, minimization and mitigation measures while at the same time providing jobs, in-state gas for Alaskans and sustainability for Alaska's struggling economy for years to come.

Sincerely,

Robert W. Stinson

IND15-1

IND15-1

Comment noted.

CC-837

**IND15 – Robert Stinson (cont'd)**

20190930-5158 FERC PDF (Unofficial) 9/30/2019 3:18:17 PM

1242 St. Gotthard Ave.  
Anchorage, AK 99508  
Senior Vice President,  
Price Gregory International

CC-838

**IND15 – Robert Stinson (cont'd)**

20190930-5158 FERC PDF (Unofficial) 9/30/2019 3:18:17 PM  
Document Content (s)

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CC-839



## IND16 – Peter McKay

20190927-5017 FERC PDF (Unofficial) 9/26/2019 11:54:54 PM

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

From: Peter E. McKay  
55441 Chinook Rd.  
Kenai, AK 99611

Date: September 23, 2019

Subject: Public Comments to Docket CP17-178-000 – Marine Mammal Monitoring and Mitigation Plan and Additional Recommended Mitigations

The AGDC Draft Marine Mammal Monitoring and Mitigation Plan (4MP) was included in the AGDC response dated 5/03/2019 to the FERC information request No. 120. I submitted reply comments on 5/20/19 to FERC that detailed my concern about the 4MP shortcomings.

AGDC has plans to submit a final 4MP. This appears to be after the close of the public comment period for the DEIS. How can the public comment on this DEIS without the 4MP? This is a vitally important component of the DEIS.

Letter Request from FERC, No. 120 on 10/02/18.

“Confirm that AGDC would provide a Marine Mammal Monitoring and Mitigation Plan developed in consultation with the National Marine Fisheries Service (NMFS), Alaska Department of Fish and Game (ADF&G), and Fish and Wildlife Services (FWS). Also, confirm that this plan will be provided so that it may be considered in the final EIS for the Project.”

AGDC submitted a supplemental response May 3, 2019 that included two Attachments.

On May 17, 2019 I submitted “McKay Public Reply Comments to Alaska LNG Supplemental Responses Dated May 3, 2019 Regarding the Cook Inlet Marine Mammal Monitoring and Mitigation Plan (AKLNG-6020-REG-PLN-DOC-00032)”.

I have not seen a satisfactory response to the concerns or issues that I raised. I believe that a properly reviewed and approved 4MP is a critical element in the DEIS. The Draft EIS cannot be properly reviewed and approved until the 4MP is published, commented on by the Agencies and the public, and is approved.

I would like to ask three of the cooperating agencies - the National Marine Fisheries Service (NMFS), the Alaska Department of Fish & Game (ADF&G), and the (US) Fish and Wildlife Service (FWS) if they are satisfied with the status of the 4MP as submitted. Will the FERC record of

IND16-1

IND16-1 See the response to comment CM6-4.

IND16-2

IND16-2 See the response to comment CM6-4.

CC-840

## IND16 – Peter McKay (cont'd)

20190927-5017 FERC PDF (Unofficial) 9/26/2019 11:54:54 PM

decision reflect any concerns from these Cooperating Agencies about the status of the 4MP advanced by AGDC?

Beluga whales will likely be encountered by the project in Cook Inlet. In 2016 when conducting vibracore samples in the Tyonek/Beluga area there were 9 marine mammals visually confirmed as described in the summary from Pipeline Marine Shallow Geotechnical Report USAP-FG-GRZZ-10-002016-011 Rev.0, 8-Sep-16 Page 2-8 (This Geotechnical report was included in the response to FERC's 10-02-2018 Letter Request 034, AGDC No. RFI-561-FERC-034-2).

*"2.10 Protected Species Observation. Smultea Environmental Sciences, LLC. (SES) was contracted by Fugro to provide Protected Species Observation (PSO) services during the marine geotechnical program. Mitigation measures identified in the Incidental Harassment Authorization (IHA) were incorporated into the PSO field protocol and implemented during the marine geotechnical operation. The full Level A (180 and 190 dB) Exclusion Zone (EZ) was monitored for protected species 30 minutes prior and 30 minutes after the VC sampling. The monitoring of protected species was conducted visually during the day time, whereas Passive Acoustic Monitoring (PAM) was used during the night time. The procedure for PAM for this project is presented in Appendix A. A total of nine (9) marine mammals were confirmed visually within the Level B (160 dB) Disturbance Zone (DZ), resulting in nine (9) potential Level B exposures. There were no marine mammals observed within the Level A EZ. A copy of daily PSO report was sent to EMALL throughout the duration of marine geotechnical program."*

### Recommended Mitigations

DEIS on Page 4-487 - Table 4.8.1-3 (cont'd) Summary of Potential Operational Impacts and Mitigation Measures for Federally Listed Species. Under Action - Vessel Traffic. I recommend that additional "Avoidance, Minimization and/or Mitigation Description" measures be added.

I recommend that all LNG cargo vessels traveling to and from the LNG Facility have a recognized Protected Species Observer (PSO) aboard for their traffic within Cook Inlet. I also recommend that all ~300 vessels per year shipping LNG should have a registered Cook Inlet Pilot aboard the vessels. The PSO's should come aboard the LNG vessels with the pilot who will be responsible for the navigation of the vessel. PSO's would monitor for the presence of protected species in the course or area of the LNG tankers and support vessels (tugs) and would have the authority to direct the vessel(s) to alter course and/or speed.

DEIS page 4-490 discusses PSO's while pile driving, and anchor handling activities are conducted for the Beluga/Tyonek Material Offloading Facility (MOF) construction. "AGDC has committed to providing PSO's to monitor and implement shut down zones to reduce the risk of Beluga whales experiencing Level A or Level B harassment during pile driving activities. PSO's would be provided for Anchor Handling, but would not be able to shut down activities if a whale entered the shutdown zone."

IND16-3

IND16-3

We agree that Cook Inlet beluga whales would likely be encountered in the Project area. See our analysis of impacts on Cook Inlet beluga whales in section 7.4 of the Biological Assessment, which is provided as appendix O of the final EIS.

IND16-4

IND16-4

Comment noted.

**IND16 – Peter McKay (cont'd)**

20190927-5017 FERC PDF (Unofficial) 9/26/2019 11:54:54 PM

I do not agree with this limitation of PSO's authority. It appears that anchor handling to support pipe lay barge productivity is given priority over the wellbeing of the protected species (Beluga Whales) in their protected critical habitat.

I support the Commission's recommendation (4-490) to restrict pile driving activities for construction of Mainline MOF in June and July, although I believe this recommendation does not go far enough to protect Beluga whales in their critical habitat. In my opinion the June and July restrictions should include limits on anchor handling in Beluga Whale Critical Habitat areas for at least these two months. I support requiring PSO's to be present when handling anchors for pipelay operations (at other than restricted seasons) and I support giving the PSO's the authority to stop anchor lay operations if beluga whales are in the work zone. What ever must be done to prevent Beluga whales from experiencing Level A or Level B harassment must be done.

IND16-5

IND16-5 Comment noted.

The current Cook Inlet Beluga whale population remains at around 330 individuals. According to NOAA: ([fisheries.noaa.gov/species/beluga-whale](https://www.fisheries.noaa.gov/species/beluga-whale)) "*The beluga numbers have declined by nearly 75% since 1979 from 1300 whales to an estimated 328 whales in 2016*". Their numbers have have not increased in recent years. Human encroachment on the Beluga habitat cannot increase. The Project is seeking to implement activities that do not afford adequate protection to the Beluga whales in their Critical Habitat Zone. I urge the Commissioners to ensure the protection of this unique Beluga population.

IND16-6

IND16-6 Comment noted.

CC-842

## IND17 – Debbie McKay

20191001-5032 FERC PDF (Unofficial) 9/30/2019 7:38:14 PM

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

From: Debbie McKay  
55441 Chinook Rd.  
Kenai, Alaska 99611

Date: September 30, 2019

Subject: Public Comments to Docket CP17-178-000 – Absence of NOI

### 1.3 PUBLIC REVIEW AND COMMENT

*“On March 4, 2015, FERC issued a Notice of Intent to Prepare an Environmental Impact Statement for the Planned Alaska LNG Project and Request for Comments on Environmental Issues (NOI) that explained the pre-filing process, provided a summary of the Project, outlined a preliminary list of environmental issues identified by FERC staff, requested written comments from the public, and asked other federal, state, and local agencies with jurisdiction and/or special expertise to cooperate with FERC in the preparation of the EIS. The NOI was sent to over 1,850 interested parties, including federal, state, and local officials; agency representatives; conservation organizations; tribal communities; local libraries; and newspapers in the Project area, as well as property owners along the pipeline route and within 0.5 mile of the planned compressor stations and LNG Plant. The issuance of the NOI established a 9-month public scoping period for the submission of comments, concerns, and issues related to the environmental aspects of the Project. The extended 9-month scoping period was in recognition of subsistence harvesting windows observed by communities potentially affected by the Project. The official scoping period for the Project ended on December 4, 2015.”*

IND17-1

IND17-1

See the response to comment IND12-1. We note that a relative living at the same address as the commenter filed written comments on the Project during the scoping period and spoke at the scoping meeting held on October 27, 2015 in Nikiski, Alaska

In March of 2015, FERC issued a Notice of Intent (NOI) to property owners along the pipeline route and within 0.5 mile of the planned compressor stations and LNG Plant. The proposed pipeline (route C2, Suneva Lake) is slated to come through our Boulder Point neighborhood and is less than a ¼ mile from our property, less than 100 yards from two of our neighbors' property. There are at least 10 residences in this neighborhood that are within 0.5 miles of the proposed pipeline. There are several more property owners with intent to build. No one in this neighborhood ever received a NOI. We were denied our due process. When we finally accidentally found out about this location, we at first didn't take it seriously. We thought it must be a mistake. We assumed that if a pipeline were coming into our neighborhood, we would have been given proper notice.

Not only did we not receive a NOI, but the DEIS reveals very little about the part of the project that will take place in our neighborhood. What will it entail? What machinery will be on premises? What will the dimensions of this project be? What kind of an environmental impact will it have on our neighborhood? How long will this project last? What will the air pollution from this project include? Will there be air quality sensors installed in our neighborhood before the project ensues to capture the impacts from the project on our neighborhood health? What will the impacts on our local water supplies look like? Our lakes, streams, the ocean? The moose and bear that we hunt drink out of these

CC-843

## IND17 – Debbie McKay (cont'd)

20191001-5032 FERC PDF (Unofficial) 9/30/2019 7:38:14 PM

waters, the salmon we eat comes out of the ocean in front of our homes. What permanent/temporary damages/changes can we expect?

IND17-1

For the shore approach there has been no decision on whether to proceed with an open trench method or a Direct Micro Tunnel (DMT).

There is very little information on what to expect of this project in our neighborhood. Our questions continue to go unanswered. I don't believe the necessary tests and research have been performed to provide the answers to these questions. How can a permit possibly be issued before there is a clear and concise plan on how they will proceed? I would contend that with the absence of an NOI and the continued silence as to the nature and scope of the project in this neighborhood, the permitting process should not go forward.

Thank You,

Debbie McKay

CC-844

**IND17 – Debbie McKay (cont'd)**

20191001-5032 FERC PDF (Unofficial) 9/30/2019 7:38:14 PM

Document Content (s)

FERC 1- NOI.DOCX.....1-2

CC-845

**IND18 – Kenneth Yockey**

20191001-5148 FERC PDF (Unofficial) 10/1/2019 1:48:46 PM

Kenneth Yockey, CHUGIAK, AK.  
October 1, 2019  
Federal Energy Regulatory Commission  
Ms. Kimberly D. Bose  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Subject: Alaska LNG Project Draft Environmental Impact Statement,  
FERC Docket Number CP17-178-000

Dear Ms. Bose:

The Alaska Gasline Development Corporation (AGDC) is requesting authorization to construct a Liquefied Natural Gas Pipeline System from Alaska's North Slope to South Central Alaska commonly known as the Alaska LNG Project. I am writing in support of AGDC's Draft EIS. My employer, Price Gregory International, has been in the business of building pipelines in North America since the 1920's. We built Section 3 of the Trans-Alaska Pipeline in the mid 70's and have been building pipelines for the Alaska oil and gas industry ever since. We have built below ground and above ground gas pipelines on the North Slope of Alaska in permafrost that are in operation today and performing to their original design.

I support all the provisions for constructing the Alaska LNG Project as outlined in the DEIS, in particular, the preferred alternative for siting the LNG Plant and Marine Terminal in Nikiski, Alaska. Another provision I support is the preferred route of the Pipeline from Prudhoe Bay to Beluga following the existing Trans Alaska Pipeline corridor and the Parks Highway ROW which is the same route approved by the Army Corps of Engineers, in June of 2019 for the Alaska Stand Alone Pipeline.

The benefits of the Alaska LNG Project far outweigh the negative impacts to the environment during construction and operation. Besides the obvious economic benefits to Alaska citizens, businesses and communities, the Project will reduce greenhouse gas emissions, not only in Alaska but more importantly in the Asian countries that will receive Alaska gas. Natural gas will replace the dependency on wood and coal in emerging economies and fuel oil in other developing countries, helping reduce carbon emissions worldwide.

The DEIS has found that impacts to wildlife, subsistence and recreation activities will not be significant with the proper implementation of avoidance, minimization and mitigation measures while at the same time providing jobs, in-state gas for Alaskans and sustainability for Alaska's struggling economy for years to come.

Additionally, over \$7.1 Billion of materials and services will be purchased in Alaska, providing a much-needed boost to the local economy. This project is good for the people of Alaska.

Sincerely,

IND18-1

IND18-1 Comment noted.

CC-846

**IND18 – Kenneth Yockey (cont'd)**

20191001-5148 FERC PDF (Unofficial) 10/1/2019 1:48:46 PM

Kenneth E. Yockey  
24271 Platsek Drive  
Chugiak, AK 99567  
Vice President - Oil & Gas  
Price Gregory International

CC-847



**IND18 – Kenneth Yockey (cont'd)**

20191001-5148 FERC PDF (Unofficial) 10/1/2019 1:48:46 PM  
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CC-848

**IND19 – Scott T. Wieman**

October 1, 2019

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

Dear Ms. Bose,

I am writing to you to comment on the draft environmental impact statement (DEIS) for the Alaska LNG project (FERC/EIS-0296D, Docket No. CP17-178-000). I am an isotope geochemist and a faculty member in the Center for Space Science and Technology in the Physics Department at the University of Maryland, Baltimore County. My educational background and current research are in climatology and environmental geochemistry. While I currently live in Maryland, I spent two summer seasons working for the National Park Service in Denali National Park and have traveled widely across Alaska. This letter reflects views that are solely my own as a private citizen.

My comments pertain to the treatment of greenhouse gas (GHG) emissions in the DEIS, especially with respect to the emission of methane. The Commission has failed to adequately discuss (1) their choice of methane’s global warming potential (GWP) in their calculation of CO<sub>2</sub> equivalent emissions by the project, (2) localized heating effects from direct releases of methane, and (3) upstream or downstream effects on GHG emissions as a result of the project. Additionally, the narrow scope of analysis in the DEIS fails to appropriately account for or contextualize the cumulative nature of project-related GHG emissions and their effects. These are reasonably foreseeable environmental impacts of the project that the public should be made aware of and the Committee decision maker should have access to in order to make a fully informed decision.

This DEIS uses a 100-year time horizon GWP for methane of 25 because it is what the Environmental Protection Agency (EPA) uses in their Greenhouse Gas Reporting Rule.<sup>1</sup> This value originally derives from the Fourth Assessment Report (AR4) of the Intergovernmental Panel on Climate Change (IPCC).<sup>2</sup> This publication, however, is now twelve years old, and the IPCC has since published its Fifth Assessment Report (AR5), which updates methane’s 100-year time horizon GWP to 28 without climate-carbon feedbacks incorporated and 34 with such feedbacks included.<sup>3</sup> These feedbacks are quite significant in Alaska, given the presence of permafrost and its massive positive feedback cycle. The EPA has since recognized the values from AR5, updating its online global warming potential for methane to 28-36.<sup>4</sup> While EPA’s GHG Reporting rule still uses the AR4 value of 25 to comply with the UN Framework Convention on Climate Change,<sup>5</sup> the GWP of 28 (no feedback) and 34 (feedback) represent the present scientific consensus and the best values available. At this stage it is more important to have the most accurate information possible so that decision makers and the public can be fully informed of potential impacts of the project.

Another important facet of methane’s GWP is its significant bias towards short-term warming. While methane’s 100-year time horizon GWP is 28 (no feedback) or 34 (feedback), its GWP on a 20-year time horizon is 84 (no feedback) or 86 (feedback).<sup>6</sup> While the DEIS uses the 100-year time horizon for its GWPs to align with the EPA’s GHG Reporting rule,<sup>7</sup> Alaska is a place where short-term radiative warming likely matters even more than long-term climate change. The arctic is warming twice as fast as the rest of the globe, and Alaska is warming at a rate nearly two and a half times the US average.<sup>8,9</sup> This arctic amplification has important

IND19-1

IND19-1 See the responses to comments CO24-2 and CO24-4.

IND19-2

IND19-2 An analysis of the potential regional impacts from global warming is included in section 4.19.4.18 of the final EIS. See the response to CO24-4 regarding global warming potentials. Further details regarding individual air pollutants contributing to carbon dioxide equivalents included in the application are available in appendices D, E, and F to AGDC’s Resource Report 9 (Accession No. 20170417-5345), available on the FERC website at <http://www.ferc.gov>. Using the “eLibrary” link, select “Advanced Search” from the eLibrary menu and enter 20170417-5345 in the “Numbers: Accession Number” field.

CC-849

ND19 – Scott T. Wieman (cont'd)

implications for flora, fauna, and permafrost, all of which are particularly sensitive to short-term warming. One way to inform both Commission decision makers and the public on this front would be to provide a breakdown of the major constituent species of GHGs emitted by the project instead of lumping all emissions together and presenting them as one equivalent emission of CO<sub>2</sub>. For example, the stationary sources GHG subtotal in Table 4.15.5-1<sup>10</sup> could include a footnote stating (hypothetical numbers for illustration) “2,000,000 metric tonnes CO<sub>2</sub>, 40,000 metric tonnes CH<sub>4</sub>, 6,000 metric tonnes N<sub>2</sub>O.” With such information, individuals would be able to better grasp potential impacts and their variability on the time scale of years, decades, and centuries.

IND19-2

Methane is also fairly unique among the major GHGs because it causes meaningful localized warming due to its absorption of short-wave energy.<sup>11</sup> While climate change is certainly a global phenomenon that requires global fixes, local expressions of climate change are potentially important impacts of the project. In the year or so it takes for methane releases to fully mix into the atmosphere, they can produce blooms of localized heating. This localized heating is amplified by regions of high albedo or significant cloud cover.<sup>12</sup> Alaska’s summer cloud cover and the bright white arctic ice cap both enhance methane’s short-wave absorption and its subsequent local heating, further increasing the importance of understanding how much methane is going to be released as part of the Alaska LNG project beyond its straight CO<sub>2</sub> equivalence. Permafrost within the continuous permafrost zone has already warmed by nearly half a degree in the last decade alone,<sup>13</sup> and melting of permafrost in reaction to local heating creates strong pulses of greenhouse gases which only serve to enhance the positive warming feedback cycle in the local area.<sup>14</sup> The North Slope of Alaska, a fragile environment that is already undergoing significant changes due to warming, is particularly susceptible to future localized warming. These direct local impacts should be addressed within the DEIS.

IND19-3

IND19-3

See the responses to comments FA1-71 and CO24-2.

This DEIS also does not account for any upstream or downstream effects of the proposed project on GHG emissions. Given the nature of the project (processing facilities and a pipeline to expressly enable commercialization of natural gas from the Prudhoe Bay and Point Thompson fields), there are a few upstream and downstream effects that are reasonably foreseeable: extraction of the natural gas, its usage in Alaska, and its export to and subsequent burning in other states or countries. Importantly, these upstream and downstream effects may be net positive on greenhouse gas emissions both in Alaska and globally. These sorts of positive GHG displacements through changes from carbon intensive fuel sources (oil, coal, etc.) to natural gas are exactly the types of indirect effects FERC has repeatedly included in previous environmental impact statements.<sup>15,16</sup>

The clearest upstream effect of the Alaska LNG pipeline project is the capture of natural gas from the Prudhoe Bay and Point Thompson fields for domestic sale and foreign export instead of the current usage of direct reinjection for enhanced oil recovery (EOR).<sup>17</sup> This may reduce carbon emissions in two distinct ways. Whatever natural gas is no longer used for EOR will either go unreplaced or be replaced with a different form of enhancement. If the natural gas goes unreplaced, oil recovery will no longer be enhanced and thus less oil will be produced from the fields. This change would likely have some form of emissions impact, though since the net emissions of using natural gas for EOR have not been well-quantified it is difficult to estimate net impact of this change. Alternatively, natural gas extraction and commercialization from the two oil units would open the door for alternative forms of EOR, such as CO<sub>2</sub> injection. Where the greenhouse gas emissions of EOR through natural gas reinjection has not been thoroughly studied, CO<sub>2</sub> EOR has been shown to be an effective method of carbon capture and

CC-850

**IND19 – Scott T. Wieman (cont'd)**

sequestration. This method actually comes close to producing zero-carbon oil, especially in large units like those on the North Slope.

The two downstream effects are similar to each other and thus can be treated together. Commercialization of natural gas from the North Slope will help provide cost-efficient natural gas to markets in Alaska and abroad. While the burning of natural gas still contributes to climate change, it produces 50-60% less CO<sub>2</sub> when burned compared to conventional coal plants.<sup>18</sup> Natural gas shows even better improvement over oil or wood, both of which are widely used as heating sources in Alaska. Without an analysis of the implications of large scale transport of natural gas to markets and how much coal, oil, and other fuel it can displace, however, the actual impact of this downstream effect remains shrouded in uncertainty.

The whole purpose of the Alaska liquid natural gas pipeline project is to bring currently-produced natural gas from the North Slope to market both in Alaska and for export to other locations. Thus the upstream effect of no longer using the natural gas for EOR and the downstream effect of displacing other fossil fuels in energy production, heating, and other uses fall squarely within the reasonably foreseeable impacts that are an important part of what the National Environmental Policy Act holds agencies responsible for addressing.<sup>19</sup> Such effects must be reasonably estimated where possible.<sup>20</sup>

Finally, the cumulative impacts of the project with respect to climate change are dismissed as inestimable and thus impossible to contextualize in any meaningful way.<sup>21</sup> While there currently exist no climate models that can perfectly account for project-level emissions and their certain impacts on the future climate, there are plenty of simple mathematical methods to estimate such impacts, especially in the short term. It is a small task to model the evolution and location of a methane plume over time when released from a point source, and that bit of methane's contribution to heating can be calculated for each discrete moment using its radiative efficiency (AR4, for example, provides a value of  $3.7 \times 10^{-4} \text{ W/m}^2 \text{ ppb}^{22}$ ). While such a calculation does not provide a perfect measure of the project's long-term contribution to global climate change, it would at least provide some estimation of localized heating at various areas in and near the project footprint. Additionally, there can be useful contextualization of climate implications for the project without attempting to input project emissions into a climate model. For example, annual operating emissions could be briefly discussed within the framework of Alaska's GHG emissions and their contribution to the US total. Alternatively, they could be discussed within the framework of oil and gas extraction across the country or fossil fuel development more broadly. These would all be helpful contextualization of the role that the Alaska LNG project will play in future cumulative emissions in the state, sector, and country.

This draft environmental impact statement for the Alaska LNG project is broadly well done, with clear input from the communities it affects. My main issues with it concern the discussion surrounding climate change impacts, both direct and indirect, of the project. This DEIS does not afford the proper attention or care to this critical issue that faces the North Slope and Alaska more broadly. Improving the transparency of accounting for GHG impacts, especially with respect to methane, would improve this draft significantly so that it may better serve the Commission decision maker in their decision on and the public in their understanding of the project.

Sincerely,

*Scott T Wieman*

Scott Wieman

IND19-3

IND19-4

IND19-5

IND19-4

Comment noted.

IND19-5

Comment noted.

CC-851

## IND19 – Scott T. Wieman (cont'd)

20191001-5214 FERC PDF (Unofficial) 10/1/2019 3:02:23 PM

- <sup>1</sup> Fed. Energy Regulatory Comm'n, *Alaska LNG project draft environmental impact statement* 4-878 (2019).
- <sup>2</sup> Piers Forster, et al., *Changes in atmospheric constituents and in radiative forcing*, in *Climate Change 2007: The Physical Science Basis*. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change 212 (S. Solomon et al. eds., 2007).
- <sup>3</sup> Gunnar Myhre, et al., *Anthropogenic and natural radiative forcing*, in *Climate Change 2013: The Physical Science Basis*. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change 714 (T.F. Stocker et al. eds., 2013).
- <sup>4</sup> Environmental Protection Agency. *Understanding Global Warming Potentials*. <https://www.epa.gov/ghgemissions/understanding-global-warming-potentials>.
- <sup>5</sup> 40 CFR Part 98.
- <sup>6</sup> Myhre et al., *supra* note 3, at 714.
- <sup>7</sup> Fed. Energy Regulatory Comm'n, *Alaska LNG project draft environmental impact statement* 4-878 (2019).
- <sup>8</sup> Osborne, E., J. Richter-Menge, M. Jeffries. 2018. *Arctic Report Card: Update for 2018. Executive Summary*. <https://arctic.noaa.gov/Report-Card/Report-Card-2018/ArtMID/7878/ArticleID/772/Executive-Summary>.
- <sup>9</sup> National Aeronautics and Space Administration. *2018 Fourth Warmest Year in Continued Warming Trend, According to NASA, NOAA*. <https://www.nasa.gov/press-release/2018-fourth-warmest-year-in-continued-warming-trend-according-to-nasa-noaa>.
- <sup>10</sup> Fed. Energy Regulatory Comm'n, *Alaska LNG project draft environmental impact statement* 4-903 (2019).
- <sup>11</sup> William D. Collins, et al., *Large regional shortwave forcing by anthropogenic methane informed by Jovian observations*, 4 *Science Advances* 9 (2018).
- <sup>12</sup> *Ibid.*
- <sup>13</sup> Boris K. Biskaborn, et al., *Permafrost is warming at a global scale*, 10 *Nature Communications* 264 (2019).
- <sup>14</sup> Róisín Commane, et al., *Carbon dioxide sources from Alaska drive by increasing early winter respiration from arctic tundra*, 114 *Proceeding of the National Academies of Sciences* 5361 (2017).
- <sup>15</sup> Fed. Energy Regulatory Comm'n, *Rockaway delivery lateral project and northeast connector project final environmental impact statement* 4-215 to 4-217 (2014).
- <sup>16</sup> Fed. Energy Regulatory Comm'n, *Constitution pipeline project and wright interconnect project final environmental impact statement* 4-256 (2014).
- <sup>17</sup> Fed. Energy Regulatory Comm'n, *Alaska LNG project draft environmental impact statement* 4-1108 (2019).
- <sup>18</sup> National Energy Technology Laboratory. *Cost and performance baseline for fossil energy plants, Volume 1: Bituminous coal and natural gas to electricity*. (2010).
- <sup>19</sup> Michael Burger & Jessica Wentz, *Downstream and upstream greenhouse gas emissions: the proper scope of NEPA review*, 41 *Harv. Envtl. L. Rev.* 109 (2016).
- <sup>20</sup> *Sierra Club v. Fed. Energy Regulatory Comm'n*, 867 F.3d 1357 (D.D.C. 2017).
- <sup>21</sup> Fed. Energy Regulatory Comm'n, *Alaska LNG project draft environmental impact statement* 4-1162 (2019).
- <sup>22</sup> Forster et al., *supra* note 2, at 212.

**IND19 – Scott T. Wieman (cont'd)**

20191001-5214 FERC PDF (Unofficial) 10/1/2019 3:02:23 PM

Document Content(s)

WiemanComment.PDF.....1-4

CC-853

## IND20 – Croitiene ganMoryn

20191001-5319 FERC PDF (Unofficial) 10/1/2019 4:30:49 PM

IND20-1

I oppose this and all pipelines. We should be concentrating on environment-friendly energy sources, not pulling more out of the ground. The truth is that ALL PIPELINES ARE DANGEROUS to the environment and to all life that exists around them. Gas pipelines are especially volatile.

Please deny this petition!

Sincerest Regards,

Croitiene ganMoryn  
6211 SE 24<sup>th</sup> Ave  
Ocala, FL 34480

IND20-1      Comment noted.

CC-854

**IND20 – Croitiene ganMoryn (cont'd)**

20191001-5319 FERC PDF (Unofficial) 10/1/2019 4:30:49 PM

Document Content(s)

Denali Pipeline.DOCX.....1-1

CC-855



## IND21 – Debbie McKay

20191001-5337 FERC PDF (Unofficial) 10/1/2019 4:56:15 PM

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

From: Debbie McKay  
55441 Chinook Rd.  
Kenai, Alaska 99611

Date: September 30, 2019

Subject: Public Comments to Docket CP17-178-000

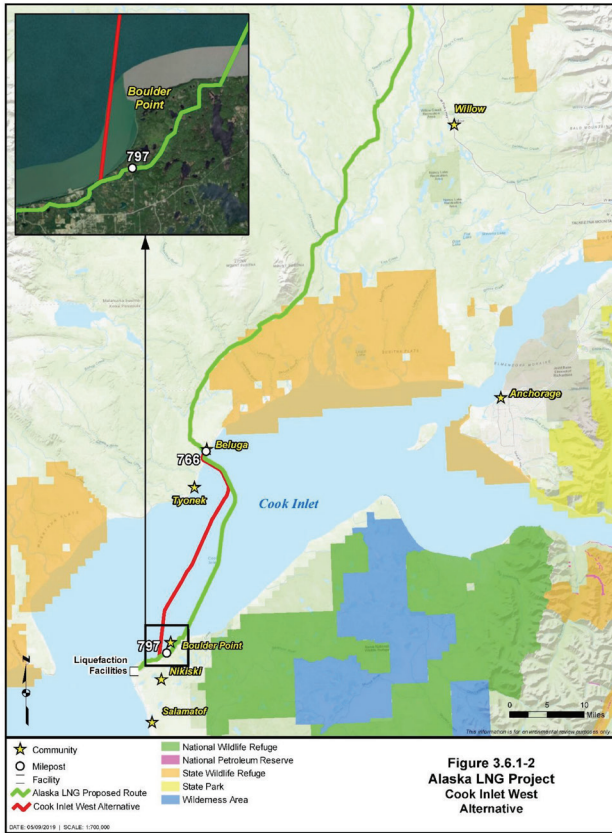
### ***3.6.1.2 Cook Inlet West Alternative***

*“The West Alternative begins on the eastern shore of Cook Inlet near Beluga Landing (MP 766.0) at the same point where the proposed Mainline Pipeline route begins its crossing of the Inlet. From this point, the West Alternative proceeds southwest across Cook Inlet along an alignment 2 to 4 miles west of the proposed route. The West Alternative makes landfall just south of Boulder Point and then follows the proposed route to the Liquefaction Facilities. Figure 3.6.1-2 depicts the proposed route and the West Alternative. An environmental comparison of the West Alternative to the corresponding segment of the proposed route is provided in table 3.6.1-2. (See map below).*”

CC-856

IND21 – Debbie McKay (cont'd)

20191001-5337 FERC PDF (Unofficial) 10/1/2019 4:56:15 PM



CC-857

## IND21 – Debbie McKay (cont'd)

20191001-5337 FERC PDF (Unofficial) 10/1/2019 4:56:15 PM

*The West Alternative would involve a 1.7-mile-longer crossing of Cook Inlet, meaning that it would have a slightly greater impact on Beluga whale Critical Habitat Area 2. The West Alternative would reduce the mileage of the route on land by 3.8 miles, thereby affecting about 69.2 fewer acres, much of which constitutes American devil's club habitat.*

*AGDC maintains that the proposed Mainline Pipeline route's approach to the southern shore of the Cook Inlet crossing has a long shallow mudflat with less potential for encountering large boulders than the West Alternative. The presence of boulders could eliminate the ability to use a trenchless crossing method at the shoreline, and an open-cut crossing would create greater shoreline disturbance, potentially requiring blasting and the construction of breakwaters or cofferdams."*

I take issue with the above statement. The Project is making the claim that the southern shore (Route C2/Lake Suneva in the Boulder Point Neighborhood) approach has less boulders than the West Alternative Route. I feel it is disingenuous and I'm not sure why they would make this claim. Any local can tell you otherwise. As a member of the Boulder Point Neighborhood, I can assure you there is a reason for this name. I went down to the beach at low tide today to take some photographs. I think they speak for themselves

IND21-1

IND21-1

See the updates to section 3.6.1.2 and 4.3.3.3 of the final EIS.

CC-858

## IND21 – Debbie McKay (cont'd)

20191001-5337 FERC PDF (Unofficial) 10/1/2019 4:56:15 PM

In this photo, you can see the boulders extend far out into the water. These are only the ones we can see. Studies show that when there are boulders above ground, they also exist below ground. This location would be a very poor choice for a Direct Micro Tunnel (DMT) Continuation, especially combined with the high, steep bluff. In AGDC's own words:

*3.6.1.2 Cook Inlet West Alternative "AGDC maintains that the proposed Mainline Pipeline route's approach to the southern shore of the Cook Inlet crossing has a long shallow mudflat with less potential for encountering large boulders than the West Alternative. The presence of boulders could eliminate the ability to use a trenchless crossing method at the shoreline, and an open-cut crossing would create greater shoreline disturbance, potentially requiring blasting and the construction of breakwaters or cafferdams."*



IND21-2

IND21-2

Comment noted.

**IND21 – Debbie McKay (cont'd)**

20191001-5337 FERC PDF (Unofficial) 10/1/2019 4:56:15 PM

Myself and the residents in our neighborhood are confused as to why AGDC would want to destroy a pristine part of Alaska with the C2./Suneva Lake route when they could bring the pipeline into the industrial area in the West Alternative route with an already existing infrastructure. This would avoid crossing Suneva Lake (with a problematic homemade dam), over 3 miles of untouched forest and it's habitat, and a beach that sustains three fishing families, as well as an entire neighborhood that would be heavily impacted from the air and noise pollution a project of this size would entail.

When looking at the overall picture, it's hard to believe that the Project has done their due diligence in researching and analyzing the proposed route. This seems to be status quo, if many of the other public comments from around the state are to be taken seriously concerning the DEIS assessments in other areas. As you can see by looking at the pictures of the beach here in Boulder Point, and from AGDC's comments regarding the two routes, it's kind of hard to believe anyone from AGDC has visited or evaluated this area.

IND21-3

IND21-3      Comment noted.

CC-860

**IND21 – Debbie McKay (cont'd)**

20191001-5337 FERC PDF (Unofficial) 10/1/2019 4:56:15 PM

Document Content(s)

Boulders.PDF.....1-13

CC-861

**IND22 – Thomas W. Hendrix Jr**

20191002-0008 FERC PDF (Unofficial) 10/02/2019

Federal Energy Regulatory Commission  
Washington DC

September 12, 2019

RE: (CP17-178-000) Alaska Gas Pipeline Project

**ORIGINAL**

Dear FERC,

Thank you for allowing me to comment on CP17-178-000. I am a lifelong Alaskan and I support the development of this project for the following reasons.

In caring for our planet on a global scale this clean energy source can be exported to Asia to provide cleaner energy sources for this growing industrial nations. Additionally, it will provide a clean and affordable energy source for Alaskan's. Currently we burn wood, coal and diesel, using this energy source will reduce greenhouse gasses both here in Alaska and points that can be reached by ship from the Pacific Ocean.

This project provides many American and Alaskan jobs so it is beneficial to the US economy. The DEIS states that impacts to public land would be temporary and as an Alaskan that watched the construction of the TAPS line I understand the benefit and focus on the environment. Overall this project can and will be done in a responsible manner.

From Compression through to the Liquefaction Facility AGDC has done a very good job at educating Alaskans of the impacts and benefits for the Alaskan People. The jobs and economic benefit of bringing a Natural Gas Source to the Pacific Rim is good for the environment, our Country and our Planet as a whole.

I strongly support the development of this project as planned.

Thomas W. Hendrix Jr.  
11034 East John Henry Circle  
Palmer, Alaska 99645

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SECRETARY OF THE  
COMMISSION  
2019 OCT -2 P 4p 05  
FEDERAL ENERGY REGULATORY COMMISSION

IND22-1

IND22-1

Comment noted.

CC-862

**IND22 – Thomas W. Hendrix Jr (cont'd)**

20191002-0008 FERC PDF (Unofficial) 10/02/2019

Document Content (s)

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CC-863



## IND23 – John Reiss

20191002-5002 FERC PDF (Unofficial) 10/2/2019 12:10:38 AM

John Reiss, Fairbanks, AK.

I live in Fairbanks and I used to have a woodstove but the pollution got so bad I had to stop burning wood and now use diesel fuel which is very expensive. A gas line would help reduce the pollution levels in Fairbanks and allow for a fuel source which is more environmentally friendly and less expensive.

The State of Alaska has had a reduction of 75% of the throughput in the Trans Alaska Pipeline which means a 75% reduction in State revenue. We are running out of cash reserves. A gas line would help provide long and short time economic boosts in employment while adding to the States revenue. My property taxes are going up and up and up.

Many people have resorted to burning coal to get away from the high cost of heating. Natural gas would be more environmentally friendly and help with greenhouse gases while offering a stable reserve of energy for both export and local consumption.

In Point Barrow Alaska the Navy put in the Gas Field years ago because they knew the advantage of local low cost energy source and people switched from coal, which was 45 miles from Pt Barrow at the Mead River, to gas since it was a better choice for simplistic and cleaner burning. What the Navy knew years ago still applies today. Gas is better. Thank you for reading this.  
John Reiss

IND23-1

IND23-1

Comment noted.

CC-864

**IND23 – John Reiss (cont'd)**

20191002-5002 FERC PDF (Unofficial) 10/2/2019 12:10:38 AM  
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CC-865

**IND24 – Bill Madsen**

20191002-5004 FERC PDF (Unofficial) 10/2/2019 12:28:52 AM

Bill A Madsen, Denali National Park, AK.  
The continuation of this boondoggle needs to end.

It was started as a means for some well connected politicians to line the pockets of their friends and themselves. It is continued on by scientists for rent who have no interest in ending their income from this. Hopefully the Feds will find a way to kill this, it seems the only way.

1- This gasline is not needed any longer. The gas can now be shipped via barges directly from the Northslope.

2- If a pipeline was needed and economical the oil companies would build it, but they also know it is much cheaper to rent legislators and governors ala Ben Stevens.

3a- If a pipeline was needed it should follow the oil pipeline. That land has already been disturbed and environmental damage has already been mitigated or has already occurred. The additional disturbance would be slight. There is no reason to create more damage by taking a separate route and especially not through National Park land or near it. None of the gas is going to be siphoned off for use in the Denali Park region, so why go there?

3-b Ahtna Corporation is making great efforts at great expense, including tax dollars, to develop Natural Gas in the Glen Allen area very near the existing oil pipeline. If they were to enjoy success in their effort, it would be very helpful to have a gasline that they could tie into to sell what they don't need locally. A line from their to the Mat-Su or Anchorage or Nikiski would be easy to construct along the highway corridor from Glen Allen to Anchorage.

4- The state is broke, it is making huge cuts to many important state services. It badly needs to stop wasting money on this boondoggle forever, but at least stop until it gets it financial house in order.

Again, the people who continue to push this forward are either corrupt oil-owned politicians or people making a living off its continuing study. I feel there is no hope to stop this nonsense at the state level and therefore hope FERC can and will.  
Thank you.

IND24-1

IND24-1

Comment noted. The Project objectives are discussed in section 1.1 of the final EIS. Alternative pipeline routes are evaluated in section 3.6 of the final EIS. See the response to comment CM14-4.

CC-866

**IND24 – Bill Madsen (cont'd)**

20191002-5004 FERC PDF (Unofficial) 10/2/2019 12:28:52 AM  
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CC-867

## IND25 – Robert J. Breeden

20191002-5032 FERC PDF (Unofficial) 10/1/2019 7:36:59 PM

October 1<sup>st</sup>, 2019

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

Docket No. CP17-178-000

### Response to the DRAFT Environmental Impact Statement

Dear Federal Energy Regulatory Commission,

I appreciate the effort that you have put into the DRAFT Environmental Impact Statement published in June 28, 2019 for Docket No. CP17-178-000. From personal experience on Boulder Point, the following refinements are recommended for the Final Environmental Impact Statement and for the subsequent Permit.

Regarding currently proposed C-2 Route Revision, a primary concern is that the frequency of large erratic boulders in the 5,000 feet proposed for subsurface boring through the coarse-grained, ice-proximal, glacial-stagnation deposits in the Boulder Point area that is understated in the DRAFT EIS, and is actually unknown because no horizontal subsurface borings or other diagnostic geotechnical evaluations have been conducted. The presence of numerous large erratic boulders offshore, along the base of the bluff at landfall, in the face of the bluff there, and in nearby gravel pits, and in other gravel pits in the landform complex demonstrates that they will be encountered during boring in that reach of the proposed route through Route Revision C-2, indicating that open trenching with all of its related negative impacts will be required. See the diagram below, of bluff in the Nikiski area. This diagram is from the State of Alaska, Department of Natural Resources, Division of Geological and Geophysical Surveys, [Guide to the ... Northern and Western Kenai Peninsula](#).

IND25-1

IND25-1

See the updates to section 3.6.1.2 and 4.3.3.3 of the final EIS.

CC-868

IND25 – Robert J. Breeden (cont'd)

20191002-5032 FERC PDF (Unofficial) 10/1/2019 7:36:59 PM

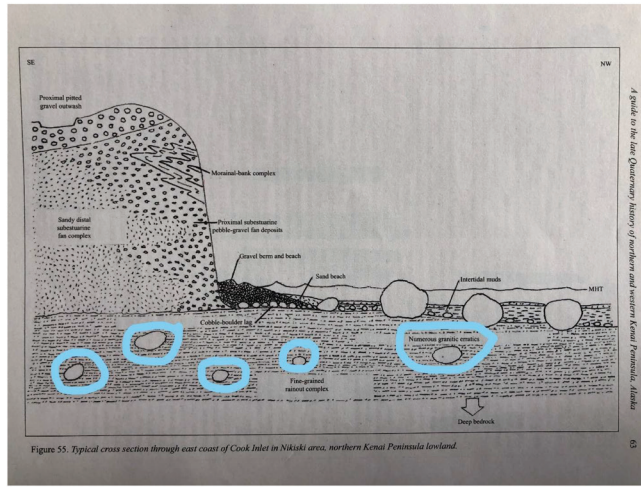
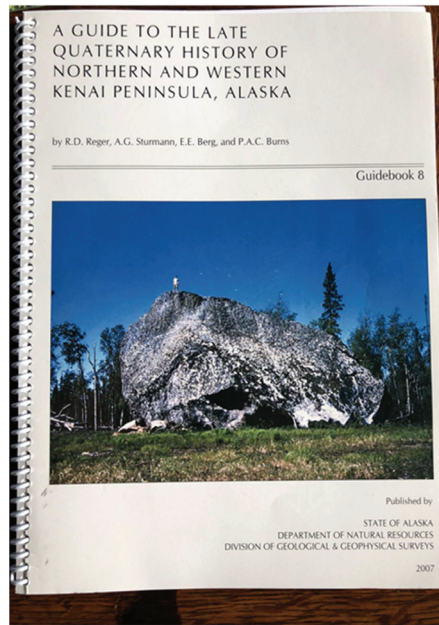


Figure 55. Typical cross section through east coast of Cook Inlet in Nikiski area, northern Kenai Peninsula lowland.

CC-869

**IND25 – Robert J. Breeden (cont'd)**

20191002-5032 FERC PDF (Unofficial) 10/1/2019 7:36:59 PM



The frequency of subsurface boulders in the proposed segment offshore of Boulder Point is unknown because no offshore geotechnical borings have been accomplished (EIS, section 4.2.3.2), so the EIS statement (p. 3-19) that the proposed Boulder Point alternative will encounter fewer boulders than in the West Alternative is not supported by inlet-bottom evidence. Vertical boring, if stated has been performed by AGDC, can only have captured 1/3,000 of the bottom – (the coverage of a 4 inch drill pipe every 1,000 feet). In fact, the available inlet-bottom evidence demonstrates a denser concentration of boulders offshore in the Boulder Point area and fewer surface boulders offshore on the West Alternative route, where several pipelines already exist.

IND25-2

IND25-2 See the updates to section 3.6.1.2 and 4.3.3.3 of the final EIS.

CC-870

**IND25 – Robert J. Breeden (cont'd)**

20191002-5032 FERC PDF (Unofficial) 10/1/2019 7:36:59 PM

VERY Hilly Country – Significant Vertical Relief: Boulder Point was created by the McArthur Glacier and Chackachamna Glacier which were combined in their push across the Cook Inlet. The glaciers bulldozed the land, and when the glacier melted away, it left very steep hills, unique to Boulder Point. When large ice chunks melted, deep kettle lakes surrounded by steep hills were created. The impact of a pipeline route through the considerable topographic relief in the Boulder Point area will be undoubtedly be considerable, because of the large cut-and-fill volumes that will be required along the proposed C-2 route. Applicant calculations show 175 additional work areas requested in the 5 miles of the route through Boulder Point. This is in addition to a 145 foot wide ROW, where FERC recommends a 75 foot ROW. How many acres of forest and wetlands will be lost? How can it be acceptable to create a visual blight upon the land? How will the groundwater resources that supply many residents, projected future residents, and wildlife be impacted? Has a census been done to determine the number of local and projected residents and the density and composition of wildlife in the affected corridor? Certainly the impacts will be considerably less in the industrial area already impacted by the existing cross-inlet pipelines near the West Alternative. Utilization of the West Alternative route will preserve this pristine area.

What will be the impacts on local residents and wildlife by increased levels of noise from blowdown and other operational activities? How far on either side of the proposed centerline will these impacts be a factor? How many local residents and what wildlife species live in that impact zone? How will the existing known, but not formally studied Moose Calving Concentration Area on Boulder Point be recognized and protected in the Final EIS? Utilization of the West Alternative Route solves these concerns.

IND25-3

IND25-3      Comment noted.

CC-871



**IND25 – Robert J. Breeden (cont'd)**

20191002-5032 FERC PDF (Unofficial) 10/1/2019 7:36:59 PM

Taking one specific species in particular that has been studied, Boulder Point has been documented as an essential feeding area for Black Bear. Black Bear feed upon the large, red Devils Club seed pods before denning in the Fall. Devils Club provides the nutrition essential for pregnant females to bear (no pun intended) healthy Cubs in the Spring. Without ample feeding upon Devils Club, Black Bear embryos aren't carried to term. Blueberry and cranberry, other Fall foods, take more work to consume than they generate. Black Bear walk as much as 25 miles to Boulder Point to feed on rich Devils Club before denning. See the attached drawing. AGDC proposed C-2 Route in Red. FERC proposed West Alternative Route in Yellow.

IND25-4

IND25-4

Comment noted.

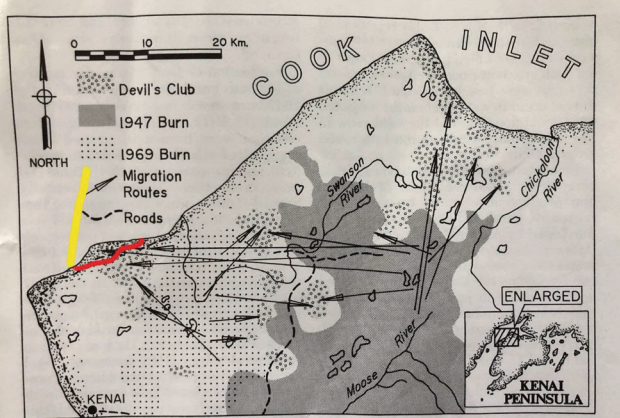
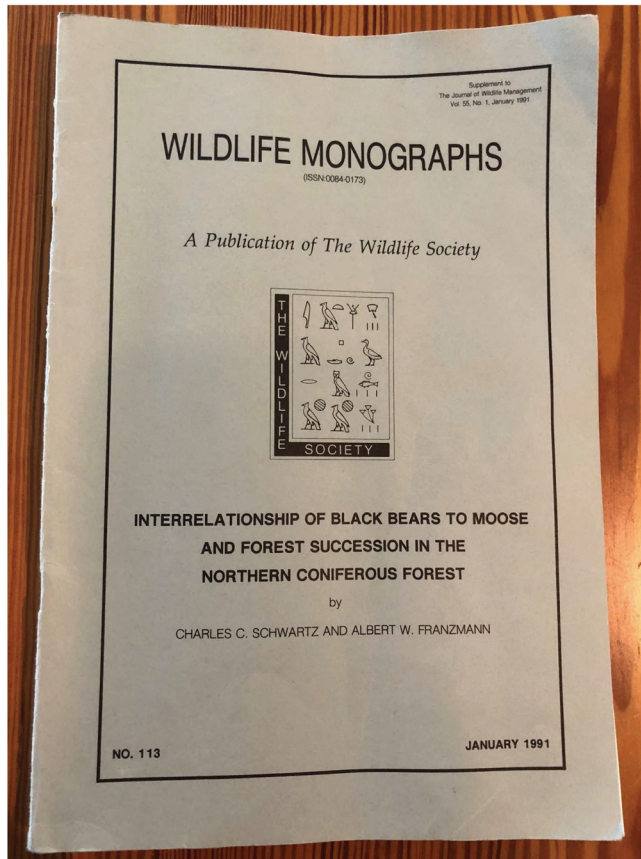


Fig. 10. Location of the 1947 and 1969 burn boundaries, the distribution of American devil's club stands, and migration routes and locations of summer feeding areas for black bears radio collared in the 1947 and 1969 burn areas, Kenai Peninsula, Alaska, 1982-86.

CC-872

**IND25 – Robert J. Breeden (cont'd)**

20191002-5032 FERC PDF (Unofficial) 10/1/2019 7:36:59 PM



CC-873

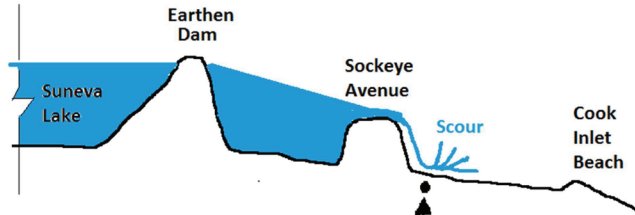
**IND25 – Robert J. Breeden (cont'd)**

20191002-5032 FERC PDF (Unofficial) 10/1/2019 7:36:59 PM

Washout Risk of Pipeline: The West Alternative route will completely avoid crossing the canyon cut by the inadvertent draining of Suneva Lake in the 1970s, which cannot be avoided by the proposed Boulder Point C-2 route. Any sudden future drainage of this large lake, perhaps triggered by an unexpected rise in lake level and overtopping of the existing dam, or even the purposeful destruction of the dam currently impounding the lake, would destroy any pipeline crossing in the scour zone of such an outburst flood. How stable is the dam currently impounding Suneva Lake? What are its foundation conditions? Is the dam design appropriate? In Winter, what focused energy is created by 2 to 3 foot thick ice slabs slamming their way downstream?

IND25-5

IND25-5 See the updates to section 4.1.3.10 of the final EIS.



**Profile View of Suneva Canyon**

Suneva Lake is 2 miles long and impounds 3 billion gallons of water.

**The Suneva Lake natural dam washed out in 1972, Suneva Lake was empty until the earthen dam was created in 1982.**

**The earthen dam was built with unclassified material, and remains vulnerable to earthquake and sudden release, causing scour, deepening the canyon, possibly breaching the pipeline.**

AGDC proposed pipeline location

The increased presence of subsurface boulders, the very hilly country that would be vastly leveled to install a pipeline, with visual impacts, with subsequent compromises to Moose and Bear habitat, and the Suneva Lake washout all make the Route Revision C-2 untenable.

IND25-6

IND25-6 Comment noted.

The existence of already-industrial Nikiski Bay with 4 pipelines with room for more, and an out-of-sight pipeline creates less harm. The West Alternative Route solves all of these concerns. FERC, please direct AGDC to utilize the West Alternative Route.

Thank you,

Robert J. Breeden, Boulder Point, Alaska

CC-874

**IND25 – Robert J. Breeden (cont'd)**

20191002-5032 FERC PDF (Unofficial) 10/1/2019 7:36:59 PM

Document Content(s)

October 1st letter to FERC.docx pdf.PDF.....1-7

CC-875

## IND26 – Linda Huhndorf

20191002-5034 FERC PDF (Unofficial) 10/1/2019 9:19:43 PM

To: Kimberly D. Bose  
Federal Energy Regulatory Commission  
Washington, DC 20426

I am writing concerning project docket number CP17-178-000, the Alaska LNG Project.  
There are two proposed routes landfall routes for the proposed pipeline in the Nikiski area:

1. The C2 Route which makes landfall at Suneva Lake/Boulder Point area in Nikiski.
2. The Alternative West Route which makes landfall at Nikiski Bay.

The following issues are my concerns regarding the C2 Suneva Lake/Boulder Point landfall route:

1. Increased likelihood of damage to the pipeline proper.

A. As its name implies, the waters of Suneva Lake/Boulder Point contain an unusually high number of boulders. Owen Boyle, a Cook Inlet diver from 1965 to 2004, has worked on most of the underwater Cook Inlet gas lines. He told me that laying a line through an area known for its boulders can be unwise, for boulders the size of cars can move with the powerful tides, endangering a pipeline.  
B. The West Alternative Route avoids laying a pipeline in a minefield of boulders.

2. Destruction of Woodlands

A. The C2 Boulder Route would destroy 17 acres of woodland, an area the DEIS deemed, "a significant loss of forest". Common sense tells us there would be an associated impact to the moose and bear population as well.  
B. The Alternative West Route does not require woodland destruction.

3. Suneva Lake Dam

A. The proposed C2 Route makes landfall near the Suneva Lake Dam. This dam has failed before, destroying all in its wake. I personally saw the destruction to the cliffs and beach.  
B. The Alternative West Route entirely avoids the Suneva Lake Dam.

4. Lack of Industrial Infrastructure

A. The C2 Route makes landfall in an area devoid of industrial infrastructure, requiring destruction of woodlands to create the necessary infrastructure.  
B. The Alternative West Route makes landfall at Nikiski Bay, an area with pre-existing industrial infrastructure. Other pipelines have made landfall at Nikiski Bay.  
It should be noted that the Alternative West Route's landfall location is less than two miles from the C2 Route's landfall location.

I ask that FERC give full consideration to the Alternative West Route, as it is clearly the most practical, sensible and least destructive of the two routes.

Sincerely,  
Linda Huhndorf

IND26-1

IND26-1

See the updates to sections 3.6.1.2 and 4.1.3.10 of the final EIS.

CC-876

**IND26 – Linda Huhndorf (cont'd)**

20191002-5034 FERC PDF (Unofficial) 10/1/2019 9:19:43 PM

Document Content(s)

Public Comments of Linda Huhndorf.PDF.....1-1

CC-877

## IND27 – Robert Breeden

20191002-5107 FERC PDF (Unofficial) 10/2/2019 12:17:52 PM

October 2, 2019

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

Docket No. CP17-178-000

Response to the DRAFT Environmental Impact Statement

Dear Federal Energy Regulatory Commission,

The West Alternative Route is the best route to keep the Pipeline in existing Industrial Areas, protecting non-industrial lands to the East. Fifteen specific aspects to protect were detailed in the letter of September 9, 2019 hand delivered to John Peconom during the Public Meeting held by FERC in Nikiski.

Below is imagery of Nikiski Bay, showing the Dock, Fuel Farm, Helipads, shop buildings and other industrial infrastructure.

This map, derived from the Kenai Peninsula Borough GIS website, depicts the Kenai Peninsula Borough owned parcels outlined in Blue. The proposed alignment of the pipeline is in Red. Two possible connection points for the West Alternative route are shown in Yellow.



IND27-1

IND27-1

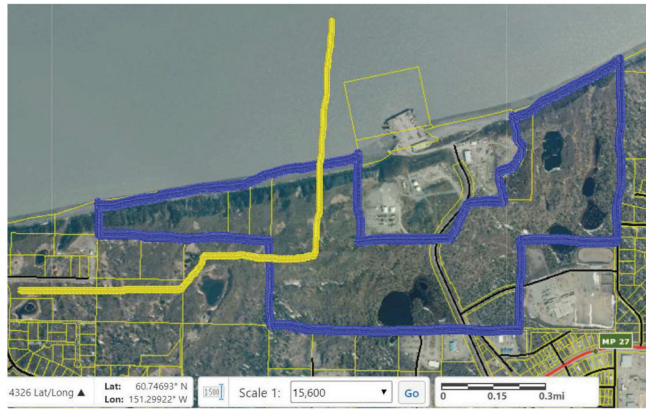
See the updates to section 3.6.1.2 of the final EIS.

CC-878

# IND27 – Robert Breeden (cont'd)

20191002-5107 FERC PDF (Unofficial) 10/2/2019 12:17:52 PM

Shown here is the West Alternative 1 option:



IND27-1

CC-879



## IND27 – Robert Breeden (cont'd)

20191002-5107 FERC PDF (Unofficial) 10/2/2019 12:17:52 PM

And shown here is the West Alternative 2 option:



Either location comes into parcels already slated to be bisected by the pipeline, as shown in Red in the first photo. This means that no new parcels would be affected by the West Alternative, a Win-Win for the habitat on Boulder Point AND the Borough Land in Nikiski Bay.

Sincerely,

Robert J. Breeden, Boulder Point, Alaska

**IND27 – Robert Breeden (cont'd)**

20191002-5107 FERC PDF (Unofficial) 10/2/2019 12:17:52 PM

Document Content(s)

October 2nd Letter West Alternative Route Depiction.PDF.....1-3

CC-881

## IND28 – John McDowell

20191003-5000 FERC PDF (Unofficial) 10/2/2019 8:09:33 PM

John McDowell, Anchorage, AK.

This comment is concerning the Alaska gasline development corporation's plan to build a gasline from Prudhoe Bay Alaska to tidewater in southcentral Alaska.

I was unable to find a "docket number" so please direct this comment appropriately.

I am in full support of a license for this important gasline project for Alaskans.

We voted in 2002 to build one if at all possible. Most of the project is on an established route on a state owned right of way.

The state of Alaska was chartered as a state to provide for itself and not be a burden to the federal government.

The oil pipeline provided a means of income for Alaska, but it is declining as all large oil fields decline.

The trillions of cubic feet of high quality natural gas potentially available to a growing Asian market is the best opportunity we have had to make the economics of an export gasline project, that would also power interior Alaska, a long sought result of having access to our own natural gas for heat and power down the central spine of our largest state, providing that luxury the rest of America takes for granted to hundreds of thousands of Alaskans who now pay exorbitant prices for all services and commodities due to the lack of affordable power and heat. This is a robust, studied, well-planned project that we Alaskans have worked hard for years to see it come to fruition.

The AGDC Alaska Gasline to tidewater will provide cleaner energy to Alaska and the world, replacing diesel and stove oil.

Construction and operation will provide an enormous boost to a weakening Alaskan economy with jobs and revenues from taxes etc.

I urge FERC to grant the permits and licenses needed to expedite this good and needed project that will help the trade imbalance we have, as well as boost the economy of Alaska and the nation as a whole. -John McDowell, Anchorage, Alaska.

IND28-1

IND28-1

Comment noted.

CC-882

**IND28 – John McDowell (cont'd)**

20191003-5000 FERC PDF (Unofficial) 10/2/2019 8:09:33 PM  
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CC-883

## IND29 – Lisa Parker

20191003-5001 FERC PDF (Unofficial) 10/2/2019 8:29:50 PM

Lisa Parker, Soldotna, AK.  
October 2, 2019  
Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D. C. 20426

Subject: Alaska LNG Project (CP17-178-000)

Dear Secretary Bose,

The Alaska Gasline Development Corporation (AGDC) is requesting authorization to construct and operate the Alaska LNG Project from the Federal Energy Regulatory Commission (FERC). In June 2019, FERC issued a draft environmental impact statement for the project and is seeking public comment.

I support the Alaska LNG Project, in particular the siting of the liquefaction plant and marine terminal in Nikiski along with the proposed realignment of the gas pipeline through Denali National Park and Preserve. The liquefaction facility would be located in an area that has served as an industrial area for the past fifty years. The first LNG ever exported from the United States was from a facility located in Nikiski. The realignment of the gas pipeline through Denali National Park and Preserve follows a route that poses the least adverse environmental impact.

As noted in the DEIS the project impacts to fish, wildlife, subsistence activities, and recreation areas will not be significant with proper implementation of proposed avoidance, minimization and mitigation measures delineated in the document.

Construction of an LNG project has been discussed since the completion of the Trans-Alaska Pipeline in the mid-1970. The project will provide Alaskans and Alaska companies with economic opportunities. It will also supply Alaskans with gas and improve air quality.

This is a project whose time has come. Thank you for your favorable consideration.

Sincerely,

Lisa Parker  
P. O. Box 1234  
Soldotna, Alaska 99669

IND29-1

IND29-1

Comment noted.

CC-884

**IND29 – Lisa Parker (cont'd)**

20191003-5001 FERC PDF (Unofficial) 10/2/2019 8:29:50 PM

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CC-885

## IND30 – Christopher Lish

20191003-5002 FERC PDF (Unofficial) 10/2/2019 9:17:46 PM

Christopher Lish, San Rafael, CA.  
Wednesday, October 2, 2019

Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Subject: Protect our wildlife from the Alaska LNG pipeline -- FERC Staff  
Issues Draft Environmental Impact Statement for the Alaska LNG Project  
(CP17-178-000)

To FERC Chairman Chatterjee and Commissioners Glick and McNamee:

I strongly urge the Federal Energy Regulatory Commission (FERC) to help  
protect Alaska's endangered wildlife by rejecting the Alaska LNG  
pipeline.

"Our duty to the whole, including to the unborn generations, bids us to  
restrain an unprincipled present-day minority from wasting the heritage  
of these unborn generations. The movement for the conservation of  
wildlife and the larger movement for the conservation of all our natural  
resources are essentially democratic in spirit, purpose and method."  
-- Theodore Roosevelt

According to the FERC's own analysis, the proposed Alaska LNG pipeline  
would likely have significant impacts on the Central Arctic caribou herds  
due to the timing during sensitive periods, permanent changes to  
sensitive habitats, and the project location at the center of the herds'  
range. The FERC even acknowledges that project construction and operation  
would result in temporary, long-term, and permanent impacts on the  
environment.

"It is horrifying that we have to fight our own government to save the  
environment."  
-- Ansel Adams

Therefore, the conclusion that the project would not have significant  
impacts or that impacts could be mitigated are at odds with the FERC's  
own analysis. The conclusion appears predetermined to fit the agenda or  
special interests that want to push forward with the pipeline regardless  
of the science.

"Every man who appreciates the majesty and beauty of the wilderness and  
of wild life, should strike hands with the farsighted men who wish to  
preserve our material resources, in the effort to keep our forests and  
our game beasts, game-birds, and game-fish--indeed, all the living  
creatures of prairie and woodland and seashore--from wanton destruction.  
Above all, we should realize that the effort toward this end is  
essentially a democratic movement."  
-- Theodore Roosevelt

IND30-1

IND30-1

Comment noted. We conducted an independent analysis of the information  
provided throughout the environmental review process and made our own  
conclusions based on that information. Impacts on wildlife are discussed in  
sections 4.6, 4.7, and 4.8 of the final EIS. Climate change is discussed in  
section 4.19 of the final EIS.

CC-886

## IND30 – Christopher Lish (cont'd)

20191003-5002 FERC PDF (Unofficial) 10/2/2019 9:17:46 PM

It is imperative that conclusions of the final Environmental Impact Statement match the content, which state that the project will cause irreversible harm. Instead of building dangerous pipelines like the Alaska LNG project, we should be protecting wildlife and investing in renewable energy that will help fight climate change.

IND30-1

"A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise."  
-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

CC-887



**IND30 – Christopher Lish (cont'd)**

20191003-5002 FERC PDF (Unofficial) 10/2/2019 9:17:46 PM  
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