IND31 – Mark Anderson

20191003-5003 FERC PDF (Unofficial) 10/2/2019 11:02:18 PM

Mark Anderson, Clear, AK.
I support the recommendation that the Alaska LNG Project, as proposed by the Alaska Gasline Development Corporation. IND31-1

Support the recommendation to install an interconnection to provide natur al gas deliveries to Denali Borough.

This will reduce dependence for burning wood, coal and fuel oil. Improve winter air quality and reduce heating costs for Denali Borough residents.

IND31-1 Comment noted.

IND31 – Mark Anderson (cont'd)

20191003-5003 FERC PDF (Unofficial) 10/2/2019 11:02:18 PM
Document Content(s)

92389.TXT.....1-1

IND32 – Daniel Darnell

Daniel Darnell, Fairbanks, AK.

RE: CP17-178-000
Secretary Kimberly D. Bose
Federal Energy Regulatory Commission
888 First Street NW 1A,
Washington, D.C. 20426

Dear Secretary Kimberly D. Bose,

I am a third generation Alaskan who lives in the interior of Alaska with my family. The Alaska LNG Project will greatly affect our community. After reading the Draft E.I.S. I felt it was important to contribute my comments. I believe this is the opportunity we have waited decades for, to safely and cleanly develop Alaska's natural gas resources to the benefit of our state residents and to all Americans. My family and I consider ourselves environmentalists. We live in Alaska because we love being surrounded by the most beautiful and unspoiled natural area on the planet. In the winter it can be a harsh and expensive place to live, but we do not like big cities or the concrete jungle, we love being free in the great outdoors along with all nature has to offer including wild animals. We see this project as an opportunity to improve not only the lives of Alaskan's through better access to energy and jobs, but also to help the environment by reducing pollution from other fossil fuel emissions, mainly coal and heating oil. IND32-1

Air quality is a huge problem in the Interior of Alaska during the winter. Scientists say the cause is wood, coal and number 2 heating oil combustion pollution. Much of the Fairbanks North Star Borough urban area is classified as an EPA Non-Attainment Area. There is no easy solution to fix our PM 2.5 pollution issue during winter weather inversions short of not heating our homes, and with so many families and children that is not a real solution. Natural gas heat can be the answer to cleaning our air and keeping families warm in the winter months.

The Draft E.I.S. concluded that most impacts to wildlife and subsistence activities from construction of a pipeline on existing right of ways would be negligible. The overall benefits to Alaska far outweigh these temporary changes or interruptions during construction. The Alaska LNG Project will allow us to use a natural resource that will benefit my family, community, State and Nation. I have full faith in the combined efforts of Federal and State agencies to prevent any significant or unnecessary damage to the ecosystem. The people who will work on this project have a vested interest in doing it safely and with respect to the environment. Although there will be many benefits throughout the State of Alaska, I want to point out one that everyone, on all sides can agree, is positive: The LNG project along with an interconnection will allow Denali National Park to transition to natural gas for its supply of energy, resulting in less pollution in this pristine and sacred area that is famous throughout the world.

IND32-1 Comment noted.

IND32 – Daniel Darnell (cont'd)

20191003-5004 FERC PDF (Unofficial) 10/2/2019 11:11:13 PM

IND32-1

After reviewing the draft E.I.S. we fully support this project, knowing it will be of immense benefit to everyone - including Mother Nature.

Thank you for your time and energy.

Dan Darnell

IND32 – Daniel Darnell (cont'd)

20191003-5004 FERC PDF (Unofficial) 10/2/2019 11:11:13 PM
Document Content(s)

92390.TXT.....1-2

IND33 – Dylan Soberay

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

Subject: Alaska LNG Project Docket Number CP17-178-000

Dear Secretary Bose,

My name is Dylan Soberay. I was born and have lived my whole life in Alaska. I am an 8th grade student at Romig Middle School in Anchorage, Alaska. I am writing today to say I support the Alaska LNG Project as proposed by the Alaska Gasline Development Corporation. IND33-1

This summer we had a lot of wildfires burning close by that caused extreme air pollution from the smoke and fine pieces of ash. It was so bad we could not go out to play sports. I imagine that people in other places have to live with air pollution like this because they live in big cities, such as in Asia, that use coal to create electricity.

The Alaska LNG project could help reduce air pollution in those Asian cities by providing cleaner burner, less polluting LNG. I think this would be good for those countries and for Alaska also since the trade winds bring those pollutants to Alaska. We all need to reduce pollution for better air quality.

I've learned that there is a huge supply of natural gas on Alaska's North Slope that will supply this project. Getting this gas to Alaskans will help with lower cost energy for people in interior Alaska and help us since we do not know how long Cook Inlet will supply us in Anchorage. Alaskan's need cleaner burning natural gas to heat our homes and generate electricity. This project will provide Alaskans a long term supply using resources that are re-cycled every day.

Our Alaska constitution mandates that we need to maximize the benefits of our natural resources. Allowing this project to be built will allow the State of Alaska to meet its responsibility to develop and sell our natural gas and oil. We learned in history that when Alaska became a state it was part of the contract with the U.S. government that we use the resources to benefit all of us. And, I believe the Alaska LNG project will benefit people outside of Alaska, too.

I want Alaska to be healthy and to have a strong economy. I think that getting this project done will support a healthy future. I respectfully request that you please do your part to permit this project to become part of our future.

Sincerely,

Dylan Soberay

Dylan Soberay
2912 McCollie Avenue
Anchorage, AK 99517

IND33-1 Comment noted.

IND33 – Dylan Soberay (cont'd)

20191003-5071 FERC PDF (Unofficial) 10/3/2019 11:11:48 AM

Document Content(s)

Comments for Alaska LNG - Dylan Soberay.PDF.....1-1

IND34 – Liv Frampton

Levi Frampton, Fairbanks, AK.
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 for the siting of the LNG plant and marine terminal. IND34-1

In Alaska the project will reduce greenhouse gas emissions through the use of natural gas versus burning of wood and coal. This will improve air quality in Alaska (Air Quality, Volume 3, page 4-877). Through potential sales of natural gas to Asian countries, this will reduce greenhouse gas and provide a cleaner engery source to a significant portion of the total world population. Asia population is equivalent to 59.76% of the total world population.

Project construction would result in economic benefits throughout Alaska from worker spending, purchases of materials, supplies and taxes.Employment
• Construction jobs - Total over eight years equals 29,100 with the peak employment during the
project's 4th year at 7,620 jobs. (Table 4.11.2-5, page 4-606)
• Operations jobs – 980 with jobs concentrated in the Kenai Peninsula Borough, Municipality of Anchorage and North Slope Borough. Gas treatment plant employing 170 personnel; Mainline pipeline, compressor and meter stations employing 225 workers; the Liquefaction Plant
employing 240 workers in Nikiski with 345 personnel for operation and maintenance in Anchorage. Projected total annual wages $385 million. (page 4-599, page 4-605)
• 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)

Other economic benefits:
• $7.1 billion of materials and services will be purchased in Alaska. (Table 4.11.2-4, page 4-602,page 4-605)
• Alaska LNG Project will create jobs and provide significant economic opportunity for businesses currently operating in Alaska. 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)
• Dutch Harbor will serve as the staging area for major sealift modules providing the community with economic benefits. (page 4-662, page 4-667)
General
• Not to mention the spur projects created providing potential of gas deliveries to villages and cities along the pipeline corridor and other resource development.

IND34-1 Comment noted.

IND34 – Liv Frampton (cont'd)

I support the recommendation and the interest expressed by the National Park Service (NPS) and Environmental Protection Agency to install an interconnection to provide natural gas deliveries to Denali National Park and Preserve (DNPP) and the Denali Borough. NPS will convert existing operations and bus fleet to natural gas thereby reducing air emissions within DNPP. IND34-1

The DEIS notes:
• Through the implementation of best management practices, impacts to wildlife will not be significant.
• Impacts to recreation areas during construction would be temporary and minor.
• The extent of impacts to subsistence activities would vary by community but overall the impacts would be not be significant.
• AGDC has responded to public concerns surrounding the development of the gas pipeline and liquifaction facitilities.
• 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. Establishment of Local Subsistence Implementation Councils to identify community issues and concerns will help to ensure impacts to subsistence activities are minimal.

In conclusion 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 project benefits, from lowering green house emissions to the short and long term economic benefits out weight the minor impacts that would be experienced.

IND34 – Liv Frampton (cont'd)

20191003-5101 FERC PDF (Unofficial) 10/3/2019 1:49:42 PM

Document Content(s)

92401.TXT.....1-2

IND35 – Debbie McKay

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: October 2, 2019

Subject: Public Comments to Docket CP17-178-000 – Methane Emissions

I believe as the permitting process moves forward, we should not ignore the part this project plays in the warming of the planet. The world has collectively come together to address the stress of fossil fuels on the climate. Permitting this project would cause millions of tons of methane to be released into our atmosphere annually. IND35-1

The Environmental Protection Agency (EPA) contends that the oil and gas industry emits eight million metric tons of methane a year. However, the Environmental Defense Fund (EDF) led a study on methane leaks from 2012 to 2018 that detected 60% more than that number, 13 million metric tons- enough to fuel 10 million homes for a year, or $2 billion worth of gas.[1]

The EPA currently estimates the methane leak rate to be 1.4%. The EDF synthesized the results from a 5 year series of 6 studies which involved more than 140 researchers from over 40 institutions and 50 natural gas companies. This effort included scholars, experts, and folks from the oil and gas industry to draw a more accurate account of methane emissions from all U.S. oil and gas operations. It integrated data with measurements made on the ground and in the air. Based on the results of this study, the U.S. is leaking methane at a rate of 2.3%. This is a substantive difference from the EPA's estimate and can have significant effects on the climate, as methane is a highly potent green house gas with more than 80 times the climate warming impact of carbon dioxide in the first 20 years after it is released. [2]

[1] https://www.edf.org/climate/methane-studies

[2] https://theconversation.com/the-us-natural-gas-industry-is-leaking-way-more-methane-than-previously-thought-heres-why-that-matters-98918

IND35-1 Section 4.15.3.1 of the final EIS discusses NSPS Subpart OOOOa, which would require AGDC to implement mitigation measures to minimize emissions of GHGs and VOCs.

IND35 – Debbie McKay (cont'd)

DEIS - ES-1

PROPOSED ACTION

IND35-1

On April 17, 2017, AGDC filed an application with FERC in Docket No. CP17-178-000,pursuant to Section 3 of the Natural Gas Act and Part 153 of the Commission's regulations, seeking authorization to construct and operate the following facilities in Alaska: a new Gas Treatment Plant (GTP); a 1.0-mile-long, 60-inch-diameter Prudhoe Bay Unit Gas Transmission Line (PBTL); a 62.5-mile-long, 32-inch-diameter Point Thomson Unit Gas Transmission Line (PTTL); a 806.6-mile-long, 42-inch-diameter natural gas pipeline (Mainline Pipeline) and associated aboveground facilities, including eight compressor stations and a heater station; and a 20 million metric-ton per annum liquefaction facility (Liquefaction Facilities), including an LNG Plant and Marine Terminal.

Converting natural gas to a liquified natural gas (LNG) is done by cooling it to -260º F. This conversion reduces it's volume by about 600 times. With 3.9 billion cubic feet (bcf) of natural gas shipping out daily from Point Thompson and 20 million metric-ton per annum LNG in this facility, at an estimated 2.3% loss, we're looking at releasing a substantial amount of methane into our atmosphere annually. From one LNG facility. This is not clean fuel or energy. We have parts of Alaska falling into the ocean, elsewhere we are experiencing droughts and warming at an unprecedented rate. Hurricanes, tornadoes, floods and forest fires are becoming much stronger and more deadly. Before we release any more of this into our atmosphere and further amplify global warming, we should figure out how to plug our leaks. Eliminating the fugitive emissions from our gas and oil industry must be a priority.

I request that FERC mandate AGDC to implement best practices to reduce methane and GHG emissions. The technology is out there, it is known. The emissions can, and should be reduced to well below what is currently permitted.

Thank You,

Debbie McKay

IND35 – Debbie McKay (cont'd)

20191003-5115 FERC PDF (Unofficial) 10/3/2019 1:47:08 PM
Document Content(s)

FERC3-methane.DOCX.....1-2

CC-901

IND36 – Larry Engel

20191003-5139 FERC PDF (Unofficial) 10/3/2019 3:27:54 PM

Larry Engel, Chitina, AK.
Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426

Dear Ms. Bose,

I am writing to express my support of the Alaska LNG Project (Docket CP17-178-000) and my support for the siting of the LNG facility and marine terminal in Nikiski, Alaska.
The Kenai Peninsula, Nikiski specifically, has been safely exporting Alaska's resources for decades and continues to be the logical location for this project to ship LNG from. IND36-1

Alaskan businesses of all sizes would benefit from the construction of this project and local Kenai Peninsula businesses of all types would see increased local opportunity.
There are also numerous businesses/companies that could open or re-open with an influx of gas to southcentral Alaska. Driving through Nikiski, it's easy to see the remnants of businesses past that employed our friends and neighbors. With the closure of those businesses, many people in the Kenai/Soldotna area have had to seek employment elsewhere in Alaska, in other fields or in different parts of the country. The nearly 30,000 construction jobs throughout Alaska and the almost 1,000 permanent jobs with $385,000,000 in projected wages estimated in the DEIS would provide nearly permanent stimulus to the Kenai Peninsula and Alaska as a whole.

These increased, widespread employment opportunities (with particular growth expected in the oil and gas, mining support services, construction, transportation, professional, scientific and technical services (page 4-604)) would benefit not just working age Alaskans, but the young Alaskans, who have not yet imagined the opportunities long term, resource development projects offer. It is my sincere hope my grand daughter and grandson have the ability to grow, learn, and work in a state with quality jobs like the Alaska LNG would provide and support.

As a 40+ year Kenai Peninsula resident and Nikiski property owner, I encourage FERC to issue a Final Order in favor of constructing the Alaska LNG project.

Thank you for the opportunity to comment.

Sincerely,
Mr. Larry Engel

IND36-1 Comment noted.

IND36 – Larry Engel (cont'd)

20191003-5139 FERC PDF (Unofficial) 10/3/2019 3:27:54 PM

Document Content(s)

92407.TXT.....1-1

IND37 – Hadassah Knight

20191003-5152 FERC PDF (Unofficial) 10/3/2019 3:53:57 PM

Hadassah Knight, Soldotna, AK.
Ms. Kimberly D. Bose

Secretary

Federal Energy Regulatory Commission

888 First Street NE, Room 1A

Washington, D.C. 20426

Dear Ms. Bose,

I am writing to support the Alaska LNG project (Docket CP17-178-000) as proposed, with the siting of the LNG facility in Nikiski, Alaska. IND37-1

The Alaska LNG project would not only offer clean, wood-smoke free air along the pipeline alignment with the availability of clean burning gas, but would offer opportunity for current, working age Alaskans down to the littlest Alaskans who will hopefully STILL reside in this state 20 years from now.

The DEIS outlines the following employment projections if the Alaska LNG project is constructed:

· Construction jobs – Total over eight years equals 29,100 with the peak employment during the project's 4th year at 7,620 jobs. (Table 4.11.2-5, page 4-606)

· Operations jobs – 980 with jobs concentrated in the Kenai Peninsula Borough, Municipality of Anchorage and North Slope Borough. Gas treatment plant employing 170 personnel; Mainline pipeline, compressor and meter stations employing 225 workers; the Liquefaction Plant employing 240 workers in Nikiski with 345 personnel for operation and maintenance in Anchorage. Projected total annual wages $385 million. (page 4-599, page 4-605)

My children have benefited from three generations of oil and gas/resource development employment; over 70% of that work occurring in south-central Alaska.

IND37-1 Comment noted.

IND37 – Hadassah Knight (cont'd)

With the continued advancement of the Alaska LNG project, they may be able to live, work, and raise their families on the Kenai Peninsula, with well paying, STEM/technical jobs too. IND37-1

Sincerely,

Hadassah Knight

Soldotna, Alaska

IND37 – Hadassah Knight (cont'd)

20191003-5152 FERC PDF (Unofficial) 10/3/2019 3:53:57 PM
Document Content(s)

92409.TXT.....1-2

IND38 – Janice Knight

20191003-5154 FERC PDF (Unofficial) 10/3/2019 3:58:04 PM

Ms. Janice Knight, Soldotna, AK.
Ms. Kimberly D. Bose

Secretary

Federal Energy Regulatory Commission

888 First Street NE, Room 1A

Washington, D.C. 20426

Dear Ms. Bose,

IND38-1

I am writing to express my sincere support of the Alaska LNG Project (Docket CP17-178-000) and specifically emphasize my support for the LNG plant and marine terminal being located in Nikiski, Alaska.

In addition to the local and world-wide environmental benefits natural gas offers, the socio-economic benefits Alaskans would reap are immense.

The Alaska LNG Project Draft Environmental Impact Statement indicates there would be over 29,000 construction jobs and nearly 1,000 full time positions when the project is complete. As an educator, retired from the Kenai Peninsula Borough School District, and a 44 year resident of the Kenai/Soldotna area, I have seen the opportunities oil and gas development offers our children. Trades and technical skills, quite often learned closer to home than traditional undergraduate programs allow, have provided generations of Alaskans an opportunity to support their families and provide a quality of life that might have otherwise been unobtainable without resource development.

The Alaska LNG project would allow for the current generation of young people to learn these valuable skills and enjoy the security for their families jobs in industry offer.

Families all across Alaska would see enhanced opportunity and quality of life with the advancement of the long awaited Alaska gasline.

Thank you for the opportunity to comment.

IND38-1 Comment noted.

CC-907

IND38 – Janice Knight (cont'd)

Sincerely,

Ms. Janice Knight

Soldotna, Alaska

IND38 – Janice Knight (cont'd)

20191003-5154 FERC PDF (Unofficial) 10/3/2019 3:58:04 PM
Document Content(s)

92404.TXT.....1-2

IND39 – Jordan Engel

20191003-5155 FERC PDF (Unofficial) 10/3/2019 4:00:52 PM

Jordan Engel, Kenai, AK.
Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426

Dear Ms. Bose,

I am writing to 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 for the siting of the LNG plant and marine terminal. IND39-1

In addition to the massive economic benefit Alaskans would see, there are enormous environmental benefits that would literally be seen in the interior of Alaska by offering natural gas as a fuel alternative to expensive diesel or dirty wood. The potential sales of natural gas to Asian countries could reduce greenhouse gas and provide a cleaner energy source to a significant portion of the total world population. Cleaner air in Asia could have a significant impact on Alaskan air/water quality as well.

Clean air/water for humans, animals and fish is hard to argue with.

Thank you for the opportunity to comment.

Sincerely,
Jordan Engel

IND39-1 Comment noted.

IND39 – Jordan Engel (cont'd)

20191003-5155 FERC PDF (Unofficial) 10/3/2019 4:00:52 PM
Document Content(s)

92408.TXT.....1-1

IND40 – David W. Haugen

ORIGINAL

David W. Haugen
10300 Elies Drive
Anchorage, AK, 99507

September 26, 2019

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

RE: FERC Docket Number CP17-178-000

Dear Ms. Bose,

I am writing this letter to express my complete support for the FERC timely approval of the Draft Environmental Impact Statement (DEIS) for the Alaska LNG project. IND40-1

It is my understanding that the Alaska LNG DEIS generated the largest volume of material ever submitted to FERC for an LNG project. The history of the development of the underlying data presented to FERC stretches all the way back to days of the construction of the TransAlaska Pipeline System (TAPS). I was a project manager for Alyeska Pipeline Services Company during the construction period for TAPS from 1974-1977. Upon completion of the TAPS project, I became a Vice-President and Senior Project Manager for Frank Moolin & Associates. That company was contracted to perform the original planning efforts for the Northwest Alaskan Pipeline Company. Northwest was a consortium of companies that proposed building a gas pipeline from Prudhoe Bay to the lower 48 states. Since those early days in the 1970's, other organizations developed alternative projects to try to commercialize the vast gas resources found on Alaska's north slope. Most of this data from those efforts has been incorporate into the Alaska Gasline Development Corporation's (AGDC) application to FERC.

As a long time (+50 years) resident of the State of Alaska, I have seen the positive consequences that came from the construction of the TAPS project. My two sons, and now my two grandchildren, have/will experience the benefits of a much improved life style due to the economic benefits that came from the crude oil flowing through the pipeline. The revenue that came to the State of Alaska generated much improved schools, as well as cultural, and recreational opportunities. These things would never have existed had Alaska's oil not been taken to the market.

Now, a new opportunity exists that will also generate positive tremendous consequences for the State of Alaska. In addition to the construction jobs and opportunities, the long term impact of additional revenue to the State of Alaska, and all its residents, will be vital to all of us that call Alaska home.

I urge FERC to approve the DEIS on a timely basis to the move the Alaska LNG project forward.

Thank you for your consideration.

David W. Haugen

IND40-1 Comment noted.

IND40 – David W. Haugen (cont'd)

20191004-0008 FERC PDF (Unofficial) 10/04/2019

Document Content(s)

15371459.tif.....1-1

IND41 – Scott Selzer

20191004-5002 FERC PDF (Unofficial) 10/3/2019 6:03:32 PM

Scott Selzer, Anchorage, AK.
I support the Alaska LNG Project as it is vital to the future of our great state……

IND41-1

IND41-1 Comment noted.

IND41 – Scott Selzer (cont'd)

20191004-5002 FERC PDF (Unofficial) 10/3/2019 6:03:32 PM

Document Content(s)

92413.TXT.....1-1

IND42 – Dominic Canale

20191004-5005 FERC PDF (Unofficial) 10/3/2019 7:37:35 PM

Dominic M Canale, Denali Park, AK.
The following comment/comments are submitted with respect to AK LNG Pipeline Project; project docket number CP17-178-000.

My name is Dominic Canale and I and my family live at 16 Lovers Lane, Cantwell AK 99755. 16 Lovers Lane is located at lot 16 in the Cantwell Small Tracts, Native Village of Cantwell. The road we live along is also known as RST-625 and is shown as such on page 7 in APPENDIX B (Volume 3 of 4) Project Maps Mainline Facilities MP 540-648. Our house is located .3-mile due east from the junction of RST-626 and the AK State Hwy. 3 (George Parks Hwy). Our property is a 3.5-acre lot situated between RST-625 and the levee along the north bank of the Jack River. Essentially, my family and I live within a 100 yards of the yellow structure refenced as AR-GA-E 566.96. The legend in the map indicates the yellow structure is an ATWS, that's an Additional Temporary Workspace according to the list of abbreviations and acronyms provided in Volume 1. IND42-1

The Denali Alternative is therefore unacceptable as the disruption and environmental impacts to our homestead of nearly 30 years far outweighs any economic benefit this project may provide. It's a travesty this type of project is even under consideration given how the fossil fuel industry is killing our planet via accelerated climate change that is human caused. The billions of dollars projected to be invested in this project is better spent into clean energy grids not dependent on fossil fuels as their source of energy. As such FERC's declaration of the No Action Alternative as not viable and not worthy of further consideration is an arrogant and damning position to take.

I therefore submit these comments in OPPOSITION to the Alaska LNG Pipeline Project (CP17-178-000) and comment further that if the project proceeds, that the Denali Route Alternative is not selected and instead be replaced with the Fairbanks Alternative for the route of the pipeline. Thank you for your consideration.

Sincerely,
Dominic M Canale

IND42-1 Comment noted. Section 4.9.1.2 of the final EIS has been updated to address this comment

IND42 – Dominic Canale (cont'd)

20191004-5005 FERC PDF (Unofficial) 10/3/2019 7:37:35 PM

Document Content(s)

92415.TXT.....1-1

IND43 – Ruth Colianni

20191004-5007 FERC PDF (Unofficial) 10/3/2019 8:45:23 PM

Ruth Colianni, Cantwell, AK.
The following comments are being submitted concerning the AK LNG Pipeline Project docket number CP-178-000.
My Name is Ruth Colianni and my family and I reside at 16 Lovers Lane in Cantwell, AK 99729.
I am writing to you to express my OPPOSITION to the AKLNG pipeline that is currently being routed roughly following the Parks Hwy. I do not feel that the gravity of the impact on the environment, the viewshed of the most heavily travelled route for tourists in the state, movements of wildlife, as well as private residences is being given adequate value in the assessments provided. I do not agree that benefits of this project outweigh what you have determined to be of significant impact. Not to mention that this gas is to be exported so it can used elsewhere to contribute to the escalating crisis of climate change. Isn't it time to invest in alternatives to fossil fuels? IND43-1
Damaging the "last frontier" image that lives in the imagination of the many travelers that come to The Great Land for that idea. Once tourists report that it's crisscrossed with industry like everywhere else that draw will be diminished.
As far as routing is concerned, the existing TAPS route is already an impact zone where issues of construction are already known factors that have been accounted for. Reinventing the wheel and tearing up what is left of the undeveloped zones that a visitor by rail, bus or car on the Parks Highway will see when there is a well understood viable route to Valdez smacks of politics. My family and I are just one of the many families who will be directly impacted by this pipeline. In our case, it will cross the Jack River a few lots away from our home.
Once again, I OPPOSE this project.

IND43-1 Comment noted. See the evaluation of the Valdez Alternative in section 3.8.1.1 of the final EIS.

IND43 – Ruth Colianni (cont'd)

20191004-5007 FERC PDF (Unofficial) 10/3/2019 8:45:23 PM

Document Content(s)

92420.TXT.....1-1

IND44 – Erica Watson

20191004-5011 FERC PDF (Unofficial) 10/4/2019 2:27:36 AM

Erica Watson, Denali Park, AK.
I am writing in support of the No Action Alternative on the Draft EIS on the proposed Alaska LNG pipeline and associated infrastructure. IND44-1

My opposition is due to the realities of climate change, local impacts to the Denali National Park region, where I've lived for the past 12 years, and the consistently shoddy handling of public process and communication at every stage of this assessment process.

Climate activist Bill McKibben describes the idea that natural gas combats climate change as a "sleight of hand," and goes on to explain that though particulate pollution produced by burning natural gas as opposed to coal is far less, its climate warming impacts are far greater than fossil fuels. During that brief stage that Alaska LNG project had a budget and some graphic designers on staff, there was an attempt to appeal to our sense of global guilt, to our desire to help Asia clean up their unhealthy air, both for the sake of our fellow humans and our local Arctic wildlife. That was AFTER this was all about cheap gas for Alaskans. The point of this project and who it's intended to benefit has been hard to follow, with one consistent thread throughout: communities along the route don't want to be plowed over on Zinke's "pipeline to Asia;" and he's gone too now, and with him (or without him) that contract, so is the market now the lower 48? It's increasingly clear it's not Alaskans. IND44-2

Here's the thing though: Asia has already moved on. The Lower 48 has already moved on. Dr. Katharine Hayhoe, one of the authors of the most recent US Climate Assessments, recently reminded Alaska that, in terms of LNG as a "bridge fuel" between coal and renewable energy sources, "the bridge has already happened; we've reached the end of the bridge." And Alaska's innovations are, on a micro-scale, far ahead of the Lower 48, and by the time this thing snakes its way to the ocean, that bridge will have been completely torn down and replaced with a wind turbine. (Or a coffin, but either way, more natural gas won't get us out of this mess.)

WAIT this deadline is 5PM EASTERN TIME??? WTF?

OK, super quick other notes: there is no cumulative analysis of the impacts of this project alongside the proposed Ambler road, Willow prospect, which also stand to have major impacts on the Western Arctic Caribou Herd and the communities who depend on them. IND44-3

There is insufficient data about transporting highly explosive gas through one of the most seismically active faultlines in the continent. IND44-4

The communities along the TAPS corridor are experiencing negative impacts to their hunting, health, and economies; the communities away from the TAPS corridor don't want it. IND44-5

And you know what, after a meeting that felt like an Orwell novel, where no one was available to talk, requests for extensions with no one to tell them to,years of gaslighting nonsense from people with continuity or IND44-6

IND44-1 Comment noted.

IND44-2 Comment noted.

IND44-3 Cumulative impacts, including those associated with the Ambler Road project, are analyzed in section 4.19 of the final EIS.

IND44-4 An analysis of pipeline safety, including in seismically active areas, is provided in section 4.18.10.5.

IND44-5 Section 4.11 of the final EIS discusses Project impacts on socioeconomic conditions; section 4.17 of the final EIS discusses Project impacts on health and safety; and section 4.14 of the final EIS discusses Project impacts on subsistence activities, including hunting.

IND44-6 Comment noted. Section 1.3 of the final EIS describes the public review and comment process for the Project. See also the response to comments CM3-1 and CM6-4.

IND44 – Erica Watson (cont'd)

20191004-5011 FERC PDF (Unofficial) 10/4/2019 2:27:36 AM

expertise, this is actually ridiculous. This EIS was dropped concurrently with FOUR OTHERS which will significantly impact the Arctic regions, already rapidly melting, the Western Arctic Caribou Herd, and the travel corridors for people and wildlife along the way, and now I catch some random east coast time in the EIS after scrambling to set aside time this last possible day, I am DONE with this. Get it together. I will see you at your construction sites. IND44-6

IND44 – Erica Watson (cont'd)

20191004-5011 FERC PDF (Unofficial) 10/4/2019 2:27:36 AM
Document Content(s)

92423.TXT.....1-2

CC-922

IND45 – Barbara Brease

20191004-5012 FERC PDF (Unofficial) 10/4/2019 3:13:03 AM

Barbara Brease, Healy, AK.
October 3, 2019
To FERC Commissioners:

Thank you for the opportunity to provide comments for the Alaska LNG Project, Draft Environmental Impact Statement (Deis). As a long-time resident of Denali Borough, along the selected pipeline route, I am alarmed by the effects that warming temperatures have had in this fragile northern environment. Global warming and industrial impacts are pushing many species beyond the threshold. The infrastructure required to build and maintain this mega project will have a massive impact on the ecosystem here and the planet. IND45-1

The scope of this plan will contribute staggering amounts of greenhouse gasses into our warming world. Last week the United Nations Intergovernmental Panel on Climate Change, made up of by hundreds of scientists from around the world, reported that the dangers of global warming are dire and we must replace carbon emissions zero-carbon alternatives. We must be looking at alternatives to fossil fuels, not pipelines.
The current route will put the pipeline through seismically active areas and landslide prone lands, increasing the chance of leaks and explosions. Furthermore, natural gas pipelines often leak Methane, which has a global warming potential about 30 times that of carbon dioxide over a 100-year period.

I purchased land on the Nenana River 30 years ago to protect the area as sanctuary. It lies just next to the routed pipeline. (Mile 267.5 on the Parks highway, next to the river). The pipeline infrastructure (including noisy smelly compressor stations in the community) and related compressor stations, material sites and heating facilities would have substantial impacts on air quality, wildlife, on my land, well being and community. IND45-2

Please consider the residents who will be effected by the infrastructure of this pipeline. Above all, please consider the impacts this proposed pipeline will have on all life around the world.

Thank you.

Barbara Brease

IND45-1 Section 4.19.4.18 of the final EIS discusses the potential impacts of the Project on climate change. Section 4.18 of the final EIS discusses the reliability and safety of the Project.

IND45-2 Section 4.11 of the final EIS discusses Project impacts on socioeconomic conditions; section 4.6 of the final EIS discusses Project impacts on wildlife; section 4.15 of the final EIS discusses Project impacts on air quality; and section 4.16 of the final EIS discusses Project impacts on noise.

IND45 – Barbara Brease (cont'd)

20191004-5012 FERC PDF (Unofficial) 10/4/2019 3:13:03 AM
Document Content(s)

92396.TXT.....1-1

IND46 – Mary Bookout

These are my comments on the Draft Environmental Impact Statement published in June 2019 for Docket No. CP17-178-000.

My husband and I own a parcel and home that will be directly impacted by the proposed pipeline project in the Boulder Point area. We are immediately adjacent to the proposed pipeline route.

Our address is:

William & Mary Bookout
48622 Nikiski REM NW
Kenai, AK 99611

We have had a lifelong dream to live in Alaska. We looked for several years for just the right fit for our lifestyle. I saw our parcel listed for sale and shown on a map of the area of Nikiski on the Kenai Peninsula. It showed a beautiful little parcel, 4 plus acres extending inland and meeting in a beautiful, pristine beach on the Cook Inlet. It was just a few miles from Captain Cook State Park. I had to see this property! After looking at all kinds of properties, we arrived in Nikiski and were driven to the parcel's location. As we were driving toward it on the Spur Highway, we saw the very industrialized section of Nikiski and my enthusiasm was dashed. But as we drove past Nikiski going east and turning in to the Boulder Point area, I knew we were home. As we drove toward the parcel, we saw black bears loping along the road. When we walked the parcel we were considering, two eagles flew directly in front of us toward the beach. I was enchanted… IND46-1

The natural wilderness was something to behold. Wild berries, soaring Burch, cottonwoods and white spruce. And the wildlife! We were told the Beluga whales would migrate right past our beach on the Cook Inlet! There was an old fisherman's hut on the bluff of our property, and I vowed to preserve every bit of it that I could. It was already trying to return to nature. We have used the old weathered boards for trim on the inside of our home. The old door is now hanging in our living space.

My husband and I bought the parcel that day and have built a wonderful place that we call home. We live gently on the land and take only what it is willing and able to spare. We live alongside nature and enjoy all that it offers. I am learning all about the wildflowers, herbs and edibles. I am learning to can and grow our own vegetables in the beautiful loamy land that will not require any amendments. It is perfect! We hope to have a greenhouse and contribute to the needs of our community.

We watch the moose and bear forage on our very unique parcel. Plenty of berries and devils club because of the marshy areas. Plenty of bedding areas, private, secluded and safe.

This is Alaska! This is what we sought and found in Boulder Point!

Needless to say, this pipeline will significantly impact our lives, that of our neighbors and that of the natural environment in which we live.

You MUST consider the very viable "West Alternative" as the ONLY option.

Respectfully,

Mary Bookout

Mary Bookout

IND46-1 Comment noted.

IND46 – Mary Bookout (cont'd)

20191004-5032 FERC PDF (Unofficial) 10/3/2019 8:37:59 PM

Document Content(s)

Mary Bookout Comments 10.3.2019.PDF.....1-1

IND47 – Anne Huhndorf

Anne Huhndorf

48964 Sockeye Ave.

Kenai, AK 99611

October 3, 2019

Kimberly D. Bose, Secretary

Federal Energy Regulatory Commission

888 First Street NE, Room 1A

Washington, DC 20426

Subject: Public Comments to Docket CP17-178-000

Dear Secretary Bose,

I'm writing to express my concerns about Route C2 shore landing at Suneva Lake/Boulder Point Community and DEIS Environmental Analysis, Section 4.1.3.10, Impacts and Mitigation on page 4-46. There hasn't been a full evaluation of this route or a Notice of Intent (NOI) for landowners such as myself and my neighbors to express our concerns or given a comprehensive plan crossing the Suneva Lake canyon. I live west and adjacent to the purposed pipeline approach and live at the mouth of Suneva Lake drainage (below the Suneva Lake dam.) IND47-1

The Huhndorf family's history dates to the late 50's, homesteading at Suneva Lake. For the past 25+ years, my family and I have lived at our current location. We have had to annually unclog the Suneva Lake culvert due to a colony of beavers that like to dam this culvert. It is a volatile dam. I have seen the water flow over this dam many times.

I also have concerns about possible archeological findings during construction and what the process will entail if there are findings? Suneva Lake area is rich in Native history. Is there a strategic plan if Native American remains are discovered during this construction project? Is the Native American Graves Protection and Repatriation Act (NAGPRA) involved? IND47-2

Human remains have been found in a couple of areas within the proposed project area. My understanding is that the local tribe was involved when remains were found. The Kenaitize Indian Tribe and a professor from the local college have extensive expertise in this matter. There are known indentations of past Barabaras; a sod or turf hut, around Suneva Lake and adjacent to my property. I would like to know that there is a strategic plan in place if findings are unearthed during construction. Many questions and concerns have not been answered by the DRAFT Environmental Impact Statement (DEIS), in this matter.

IND47-1 While the Mainline Pipeline route was modified after FERC issued the NOI, residents of the Boulder Point area, including the commenter, were included on the mailing list for the NOI given their proximity to the then proposed route and/or alternative routes under consideration. The current proposed route for the Mainline Pipeline is discussed throughout the final EIS. Section 4.1.3.10 of the final EIS has been updated to provide additional information on geological hazards in the vicinity of Suneva Lake Dam.

IND47-2 AGDC's Plan for Unanticipated Discovery of Cultural Resources and Human Remains is discussed in section 4.13.4 of the final EIS. Instructions on accessing this plan were provided in table 2.2-1 of the draft EIS and likewise are provided in table 2.2-1 of the final EIS.

IND47 – Anne Huhndorf (cont'd)

20191004-5033 FERC PDF (Unofficial) 10/3/2019 8:38:46 PM

Figure 3.6.1-2 Alaska LNG Project Cook Inlet West Alternative

IND47-3

I'm in favor of the Nikiski Bay "Cook Inlet West Alternative" route for the Cook Inlet crossing due to the rich historical significance of the Suneva Lake area.

Thank you,

Anne Huhndorf

Resident of Boulder Point Community

IND47-3 Comment noted.

IND47 – Anne Huhndorf (cont'd)

20191004-5033 FERC PDF (Unofficial) 10/3/2019 8:38:46 PM

Document Content(s)

Public Comment on Docket No. CP17-178-000.PDF.....1-2

IND48 – Joe Dubler

20191004-5098 FERC PDF (Unofficial) 10/4/2019 12:50:01 PM

Joe Dubler, Palmer, AK.
October 4, 2019

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, D.C. 20426

Re: Comments on the FERC DEIS for the Alaska LNG Project (FERC No. CP17-178-000)

Dear Ms. Bose,

For the record I am Joe Dubler, Interim President of the Alaska Gasline Development Corporation, the sponsor of the Alaska LNG Project and I am pleased to submit the following comments in support of the Project. IND48-1

Knowing that my staff have done their usual thorough job at responding to the technical issues identified in the Draft Environmental Impact Statement, my comments herein will represent my personal opinions.

There are many reasons that I support AKLNG including energy security, environmental, and economic. I trust the myriad of federal agencies to ensure the first two reasons are addressed, but as a life-long Alaskan father and grandfather, my comments are centered in the economic area.

We have many friends that have also lived in AK and raised families here, the vast majority of whom now must travel to the Continental United States to visit their children and grandchildren. This is a problem Alaska shares with much of rural America—children grow up and regardless of their desires, they have to move away to get jobs.

AKLNG is an opportunity for our State to slow or even stop the exodus of our bright young minds. There are many opportunities that relatively low cost energy offer—from mining critical rare-earth metals to providing a consistent source of heat and electricity for much of the State.

Many of the lessons learned in over 50 years of construction and operations on the Alaska North Slope have been incorporated into AGDC's application because Alaskans want responsible development of their natural resources—we are a resource dependent state and projects like AKLNG are necessary to not only provide support for our state government, but opportunities for businesses and individuals to earn a livable income.

Please help us keep our families together and our economy strong by approving the EIS for AKLNG.

Sincerely,

Joe Dubler
PO Box 1084
Palmer, AK 99645

IND48-1 Comment noted.

IND48 – Joe Dubler (cont'd)

20191004-5098 FERC PDF (Unofficial) 10/4/2019 12:50:01 PM
Document Content(s)

92425.TXT.....1-1

IND49 – 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 –

AGDC (the state of Alaska) is the current applicant advancing the DEIS though the FERC permitting process. It is recognized (widely reported) that AGDC will not be the builder or operator of the LNG pipeline or facilities. The current AGDC mandate from the current State of Alaska administration is to get the FERC EIS completed and approved. The State believes that the EIS can then be transferred for construction and operation. The state may participate in some partnership that would enable favorable Federal taxation. IND49-1

When I participated in the Public Scoping Meeting for this project in October of 2015 Commissioner Maggie Suter introduced this lineup of proposed parties: "This is an environmental scoping meeting for the Alaska LNG Project proposed by the Alaska Gas Line Development Corporation, BP Alaska LNG, ConocoPhillips Alaska LNG Company, Exxon Mobil Alaska LNG and Trans-Canada Alaskan Midstream or we like to refer to all of them combined as the Applicants or AKLNG".
How things have changed.

It is very difficult to ask questions of AGDC and get commitments about construction and operational details when they are not the ones who will follow through on these details. This exposes a flaw in the potential transfer of an EIS between entities. Perhaps the time for this EIS is not ripe. I suggest the EIS should wait until the actual owner/builder/operator of the facility is identified. IND49-2

I urge the Commissioners to set a limit on the transfer of the EIS, and that transfer of the EIS to other parties triggers a public review of the current construction plans and EIS update to meet any revised environmental regulations. The project construction "begin by" date should be firm and not extendable.

Commercial no customers are lined up.

IND49-1 Comment noted.

IND49-2 Comment noted. See the response to comment CO26-53. If the Commission authorizes the Project, the conditions identified in the Order would be applicable to construction and operation of the proposed facilities.

IND49 - Peter McKay (cont'd)

Fugitive emissions? Can the project commit to greenhouse gas emission reduction on both the Plants and pipeline? This is not addressed in the DEIS. What are the plans for leak inspection? Will the Gas Treatment Plant (GTP), the gas pipeline builder and LNG plant operator pledge to keep fugitive emissions of methane from its operations to less than .02%. I believe this .02% leak target means that 99.98 % of the methane gas entering a facility or pipeline is delivered out the other end. The LNG facility is designed to deliver 20 million metric tons of methane per annum. To meet the .02% goal the Project would need to limit fugitive emissions (leaks) to 400 thousand tons of methane per annum. This seems like a reasonable initial target. Clear and measurable emission targets must be part of this EIS as both a construction specification and as an operational and maintenance (O&M) performance specification. I urge the Commissioners to require the Project to set fugitive emission targets. IND49-3

U.S. gas industry warned to reduce emissions

"(S&P Global Platts; Sept. 13,) – Liquefied natural gas from the U.S. can fuel power plants and help cut carbon emissions globally by displacing coal, but the gas industry needs to address its own emissions issue — methane — the head of the International Energy Agency warned. Such investments, even those driven by stringent regulations, would have a nominal impact on the average cost of gas production, IEA Executive Director Fatih Birol said at an industry event in Washington, D.C., on Sept. 12.

Birol estimated the average cost of U.S. gas production would increase by a maximum 7 percent in the most difficult case. 'In my view, companies should not be so greedy," Birol said. "The Achilles' heel of the gas industry is the methane emissions. And the good news for the industry is this can be fixed by existing technology only using the best practices. And I can tell you that many companies are taking this seriously.'

The U.S. LNG industry also zeroed in at the event on the importance of cutting methane and carbon emissions. Representatives of LNG pioneer Cheniere Energy, fellow exporter Sempra Energy and export hopefuls Tellurian, NextDecade and LNG Ltd. said the sector needs to step up reducing carbon emissions as it promotes climate benefits of gas. U.S. LNG veteran Octavio Simoes advocated for measures to end the extensive flaring of gas. 'We cannot afford to be saying gas is a great fuel for lowering CO2 emissions and then burning 1 bcf of gas in the basins. It just doesn't make any sense.'"

The proposed LNG development has been promoted as a way to reduce greenhouse gas emissions. Compared to other hydrocarbon fuels, this may be true. This is mostly true at the point of use for the end-user of the gas. For Alaska however the cost of extracting the gas from the ground, cleaning the gas, transporting the gas via pipeline to tidewater, compressing and chilling the gas to change state to a liquid all have an energy cost and require consuming considerable energy. This energy is consumed right here in Alaska. It is primarily consumed by the gas turbines that clean the gas (at the GTP), turbines that pump the gas through the IND49-4

IND49-3 See the response to comment IND35-1.

IND49-4 The air emissions, including GHG emissions, associated with gas treatment, transportation, and compression are quantified and included in section 4.15.5 of the final EIS. The impacts associated with these emissions to the region are included in the impact assessments provided in section 4.15.5 of the final EIS.

IND49 - Peter McKay (cont'd)

pipelines and turbines that compress and chill the gas to turn it to a liquid (at the LNG Plant). Of particular concern is the consumption of methane gas that happens locally here in Nikiski only a few miles from my home.

https://petrowiki.org/Liquified_natural_gas_(LNG)#References estimates that 10% of feed gas is consumed to deliver the LNG to out the last valve at the facility. *"The typical gas consumption for the production of LNG from feed gas in the liquefaction plant can be calculated on the basis of 10% of the feed gas used for internal fuel consumption. The total energy required for the plant comes from the feed gas itself."*

If 20 million tons of gas are processed by the Nikiski LNG plane per annum, then 10% of that gas is consumed by the plant's turbines, heaters, generators, flares etc. This amounts to ~2 million tons of methane gas that are consumed/burned in my community. The delivered LNG cargo may reduce total greenhouse emissions at the point of delivery/use (in Asia) compared to coal or oil, but it increases the (carbon, nitrogen, sulfur etc.) emissions here in Nikiski, Alaska in my neighborhood. I do not favor this shifting of the burden of the consumption of greenhouse gas to the State of Alaska or my community. This affects the very air I breathe. IND49-5

A gas pipeline to deliver affordable and dependable fuel to Alaskan homes and businesses is a great idea. This has the ability to clean up Fairbanks (winter) air quality and provide affordable power and heat to remote villages and Railbelt communities. IND49-6

The AKLNG project should revert to the modest and reasonable goals of the All-Alaskan Pipeline. Scrap the LNG export facility plans. It will not provide value to Alaskans and is not worth the local tons of emissions.

IND49-5 See the response to comment IND49-4.

IND49-6 Comment noted.

IND50 – 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 –

If there is a pipeline breech that requires a pipeline repair – Say for example there is a large earthquake that fractures the pipeline (while it is in service)… How will the pipeline contents be handled so that the pipeline can be bled down to work on it? Will the pipeline contents be vented to atmosphere? There is a significant difference between venting 20 miles of pipeline gas contents, and venting 50 miles of pipeline gas contents. IND50-1

"In accordance with 49 CFR 190.341, a Special Permit is an order by which the DOT waives compliance with one or more of the federal pipeline safety regulations under the standards set forth in 49 USC 60118(c) and subject to conditions set forth in the order. A Special Permit is issued to a pipeline operator (or prospective operator) for specified facilities that are, or—absent a waiver—would be subject to the regulation. AGDC filed five Special Permit applications with the DOT to waive compliance with certain standards set forth in various regulations to construct, operate, and maintain the Mainline Pipeline and Liquefaction Facilities. The proposed waivers are discussed in section 4.18. The DOT provided notice to the public of its intent to consider the applications and invite comment. This notification is separate from FERC's NEPA public process associated with this EIS. The DOT may consult with other federal agencies before granting or denying the applications."

I am commenting on the AGDC requested variance of DOT specifications for the spacing of Main Line Block Valves (MLBV's). This can be found on DEIS Section 4.18.10.3 on Page 4-1095.

"Mainline Valve and Crack Arrestor Spacing

Section 192.179 specifies valve spacing requirements; however, the Administrator may approve alternative block valve spacing that has an equivalent level of pipeline safety. AGDC completed an engineering assessment to determine spacing that provides an equivalent level of pipeline safety and applied for an exemption from DOT prescribed block valve spacing requirements in

IND50-1 PHMSA does not have regulatory jurisdiction over gas venting (blowdown) methods used by the Operator along the pipeline. Normally, gas venting for pipeline repairs is handled by operationally lowering the pipeline pressure, using temporary compressors to move the gas into the upstream or downstream pipeline sections, and either venting or flaring the remaining gas.

IND50 - Peter McKay (cont'd)

Class 1 remote locations based on the reduced probability of damage or rupture. AGDC found that based on past studies, the probability of incidents due to third-party interference is directly related to the population level with a much lower frequency in Class 1 locations compared to the higher class locations. Approximately 801 miles, corresponding to 99 percent of the Mainline Pipeline route, would be in Class 1 locations. In addition, more than 700 miles of the route would be in areas with no inhabited dwellings within the class location corridor of 220 yards on either side of the pipeline centerline, which further reduces the probability of experiencing mechanical damage or rupture in these regions. In the case of a pipeline hit occurring on the Mainline Pipeline, AGDC's fracture control plan provides for a robust design against fracture initiation in excess of 200,000 pounds of force. From analysis of the incident databases, the probability of rupture due to third-party mechanical damage is lower for pipelines with wall thickness greater than 0.59 inch. The minimum wall thickness of the Mainline Pipeline is 0.677 inch, which occurs for X80 pipe segments following alternative MAOP requirements in Class 1 locations. AGDC applied for an exemption from the DOT from the prescribed valve spacing requirements in Class 1 locations based on the reduced probability of damage or rupture.

In the Special Permit application, AGDC is requesting that MLV spacing be increased from 20 to 50 miles when north of Fairbanks and from 20 to 30 miles when south of Fairbanks. The Special Permit request includes spacing specifications, valve monitoring, control and closure specifications, and reporting and certification requirements. AGDC would have the ability to remotely close the 13 MLVs managed from the Gas Control Center (those at compressor stations, the heater station, and both ends of the Mainline Pipeline). The remaining 19 valves on the system would be Automatic Shut-Off Valves that would be able to sense a leak of a defined size and automatically close without a response from the control center. Table 4.18.10-5 identifies each of the MLVs along with the proposed spacing and valve type."

It is my understanding that MLBV's are installed in the gas pipeline to "sectionalize" or limit the release of gas to each segment between valves. These valves are proposed to be both remote operated valves (ROV) or automatically operated valves (AOV) which are designed to close on a pressure reduction setpoint to reduce the amount of gas that is released. IND50-2

Nobody knows where, when, if or what kind of pipeline failure will occur. However – increasing the spacing between MLBV's increases the amount of gas that will be vented if there is a pipeline loss of integrity.

The pipeline route from the North Slope to Nikiski crosses several areas of known seismic activity. Given the pipeline's exposure to earthquakes over the lifetime of the pipeline – it makes sense to decrease the spacing between MLBV's – Not increasing the distance.

I do not support the blanket approval to increase the distance between MLBV's to 50 miles North of Fairbanks, and 30 miles south of Fairbanks. This distance spread seems arbitrary. If the Project can demonstrate that each individual spread should be increased, based on a IND50-3

IND50-2 PHMSA publicly noticed the reasons for allowing the use of remote controlled valves (RCV) and automatic shut-off valves (ASV) on the pipeline in the *AGDC - Alaska LNG Pipeline Mainline Block Valve Spacing Special Permit Request Final Environmental Assessment and Finding of No Significant Impact* (Alaska LNG MLBV SP FEA/FONSI) and associated *AGDC- Alaska LNG Pipeline Main Line Block Valve Spacing Technical Support* (Alaska LNG MLBV Technical Support) document filed on the docket at PHMSA-2017-0045 in www.regulations.gov. Use of this type of valve controls limit the release of gas and are not required in 49 CFR Part 192. The shutdown time for RCV and ASV valves would limit valve closure times after a pipeline rupture to under 40 minutes, versus up to 2 hours, to travel to the valve site. The Alaska LNG MLBV Technical Support document, Table 3: Analysis Cases, and Alaska LNG MLBV SP FEA/FONSI, Table 1: MLBV Locations (Mainline Block Valve Locations), detail the timing for shutdown and gas release along the proposed pipeline.

IND50-3 Justification for usage of RCV and ASV and spacing up to 50 miles is explained in the Alaska LNG MLBV SP FEA/FONSI and Alaska LNG MLBV Technical Support document issued by PHMSA (filed on the docket at PHMSA-2017-0045 in www.regulations.gov).

IND50 - Peter McKay (cont'd)

IND50-3

justifiable need – then these should be considered on a case by case basis. The DOT 20 miles between MLBV standard is set to assure maximum safety. It should not be compromised.

I urge the Commission, DOT, PHMSA and other agencies to look hard at the variance requested by AGDC for increased spacing between Main Line Block Valves.

IND51 – Peter McKay

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 –

From the DEIS on Page 4-1089 regarding MLBV's

"A Gas Control Center would monitor system pressures, flows, and customer deliveries. The Gas Control Center would be manned 24 hours a day, 365 days a year. Additionally, AGDC would operate a Backup Control Center. The backup control center would be used in the event the Gas Control Center becomes unavailable. AGDC would also operate a regional operation and maintenance office in Alaska where personnel could respond appropriately to emergency situations and direct safety operations as necessary. Data acquisition systems would be present at all meter and compressor stations along the Project's system. If system pressures were to fall outside a predetermined range, an alarm would be activated and notice would be transmitted to the Gas Control Center, indicating that pressures at the station are not within an acceptable range. Real time monitoring and control of pipeline flows, pressure, and temperature of at least 11 of the MLVs (those at compressor stations, the heater station, and both ends of the Mainline Pipeline) would be managed from the Gas Control Center. Monitoring would enable diagnosis of pressure transients and, if necessary, the remote closure of MLVs and shut-down of compression equipment."

I note that from the summary (above) of the capabilities of the Gas Control Center that real time monitoring and control is planned for *at least* 11 of the 30 Main Line Block Valves. IND51-1

However there are a minor discrepancy that must be resolved. On page 4-1096 of the DEIS AGDC states: "*AGDC would have the ability to remotely close the 13 MLVs managed from the Gas Control Center (those at compressor stations, the heater station, and both ends of the Mainline Pipeline)".*

TABLE 4.18.10-5 on Page 1096 of the DEIS shows that MLBV 28 at MP 793.3 would be a remote-controlled valve (RCV). I support MLBV 28 being a RCV

CC-938

IND51-1 Sections 4.18.10.2 and 4.18.10.3 of the final EIS have been updated to address this comment.

IND51 - Peter McKay (cont'd)

The two MLBV's on either side of the Cook Inlet (MLBV 27 in Beluga/Tyonek and MLBV 28 in Nikiski) are among those not listed to be furnished with remote monitoring and/or control (and would not have data acquisition systems) in the Page 4-1089 summary of the system capability. IND51-2

The sub-sea pipeline and nearshore approaches can be expected to be some of the highest wear locations along the pipeline route. The ocean environment is harsh and relentless.

It would seem logical that those locations where the pipeline enters Cook Inlet, and where it exits would be equipped with MLBV's that have real time monitoring, data acquisition and remote control.

The pipeline will enter Cook Inlet in a designated Beluga Whale Critical Habitat. The applicant must have the ability to stop gas flow to a possible pipe rupture in this area – as quickly as possible to avoid acoustic damage to Beluga whales who may be in the area. This is a pipeline segment that needs maximum MLBV protection. TABLE 4.18.10-5 on Page 1096 of the DEIS shows that MLBV 27 at MP 766.0 would be a Automatic Shut-Down Valve (ASV). I support MLBV 27 being a RCV. This critical location needs to have the ability to open/close the MLBV (from the Gas Control Center) and verify that the valve is closed (valve status), as well as transmit/display pressure (and temperature etc.) data to the Gas Control Center. IND51-3

I urge the Commissioners to carefully examine the proposed pipeline control scheme and staffing plans to ensure that MLBV operation is designed for maximum safety and reliability. **Please require remote control (RCV's) and monitoring capability for all pipeline MLBV's.**

The security of the pipeline would benefit from real time monitoring of remote pipeline facilities – especially those that are not manned. I suggest that pipeline control and data systems be combined with security systems. This would make a case for the installation of fiber optic cables along the pipeline route where all data could be comfortably handled. IND51-4

IND51-2 As indicated in table 4.18.10-5 of the final EIS, MLV 27 would be an automatic shutdown valve and MLV 28 would be a Remote Controlled Valve.

IND51-3 Comment noted.

IND51-4 PHMSA requires monitoring of pipeline pressures along the pipeline at compressor stations and RCVs.

IND52 – Peter McKay

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 –

Just in time shipping of LNG product. There can be little delay in shipping at the point of delivery to a vessel, or the valves must be closed at Pt. Thompson and all the way down the pipeline. LNG plants/trains are very challenging and expensive to (re)start. Details on the LNG facility ship loading plans indicate the intent to use a single pipe within a stainless steel outer pipe. "This containment method is proposed for the LNG marine vessel loading lines between the LNG storage tank area and the dock as well as for the LNG liquefaction rundown lines between the LNG storage tank area and the liquefaction processing trains." Details on this plan are found on Page 4-1020 of the DEIS. This pipe within a pipe for the loading line and the is expected to provide assurance against pipe leaks or failure by having a second pipe wall. I do not find this adequate. There are several issues. 1) The DEIS identifies the very real problem of thermal shock to the outer stainless pipe. 2) The inability to truly inspect the piping system (inner pipe, outer and annular space) and 3) if or when the annular space between the pipes is breached there will be operational pressure (some time in the future) to operate (continue to load vessels) with gas pressure or temperature anomalies. The chances of these resulting in the inability to contain the LNG can be prevented by requiring the installation of a second loading line. It does not appear there are pig launching and receiving capability in the plans - at this time. There is also not a convenient or reliable way to conduct pipeline inspections. A failure of a single loading pipeline would put the entire pipeline and facilities out of service. This pipe within a pipe system should be designed with true redundancy. Single points of failure must be identified and eliminated where possible. Install a second vessel loading pipeline system (to each berth) as well as a second LNG liquefaction rundown lines between the LNG storage tank area and the liquefaction processing trains. IND52-1

I fully support the Commissions DEIS request for additional information on the subject of a pipe within a pipe and other issues around the ship loading part of the LNG facility (beginning on Page 4-1068). The loading facility is a "wear point" and in my opinion it is shows some weakness in design that may impact the facility and community safety. IND52-2

IND52-1 The spill containment discussion in section 4.18.5.5 of the final EIS includes our recommendation for AGDC to provide additional detailed information on the pipe-in-pipe systems, for review and approval, prior to construction of the final design. This would include a requirement for AGDC to demonstrate that the outer pipe system could withstand the combined thermal shock and jetting force from any size LNG release from the inner pipe, as well as the provision of adequate integrity management and inspection plans for the pipe-in-pipe systems. However, the amount of redundancy in the transfer piping proposed for this project appears to be consistent with that provided in most other current LNG projects, and therefore, no additional requirements are being recommended for further redundancy in the transfer piping.

IND52-2 See the response to comment IND52-1.

IND52 - Peter McKay (cont'd)

- *"Prior to the end of the draft EIS comment period, AGDC should file with the Secretary the following for the final design of the pipe-in-pipe systems (or if necessary, provide a revised spill containment system for these LNG transfer lines) at the Liquefaction Facilities, including:*

IND52-2

a. modeling to demonstrate that the outer pipe, intended to serve as containment for the ship transfer and rundown lines, could withstand the combined force and sudden thermal shock for the full range of potential release sizes (up to a full rupture of the inner pipe) onto the warmer outer pipe;

b. an assessment of outer pipe bowing due to a full inner pipe rupture or any smaller release;

c. an assessment of the vapor production and vapor handling capacities within the annular space during a full inner pipe rupture or smaller release into the outer pipe;

d. a stress analysis for the pipe-in-pipe systems, including at bulkheads and including the differential stresses between the inner pipe and outer pipe for a full inner pipe rupture, or any smaller release, at any location along the system;

e. the design and a plot plan layout of the pipe-in-pipe system, including identification of all conventional process lines extending from or attached to the pipe-in-pipe, as well as the locations of any reliefs, instrumentation or other connections along the inner or outer pipes;

f. leak testing details and pressures for the outer pipe;

g. details of the maintenance procedures that would be followed over the life of the facility to determine that the outer pipe would be continuing to adequately serve as spill containment;

h. plans for purging or draining LNG from the outer pipe; and

i. details of any features that would protect against external common cause failures of the inner and outer pipes, including heavy equipment accidents.

- *Prior to the end of the draft EIS comment period, AGDC should file with the Secretary an analysis of the impacts that could occur from a catastrophic failure of the pipe-in-pipe system at the Liquefaction Facilities over the beach and waterway, as well as within the plant, including areas reached by the rundown line. In addition, for any areas that this catastrophic failure can impact, AGDC should clarify what measures they have to restrict access at the beach by the public to prevent any significant impacts.*
- *Prior to the end of the draft EIS comment period, AGDC should file with the Secretary a quantitative analysis of the potential for cascading impacts from the pipein-pipe system at the Liquefaction Facilities that could occur due to vapor cloud explosion overpressures, jet fires, or pool fires from design spills.*
- *Prior to the end of the draft EIS comment period, AGDC should file with the Secretary an analysis that demonstrates that the design of the marine impoundment system at the*

IND52-3 A safety factor of 1.1 for negative buoyancy should mean that it has 10 percent or more safety factor to keep it from floating in the water. It does not take into account any stresses from sea currents and tides.

IND52 - Peter McKay (cont'd)

Liquefaction Facilities would capture large jetting releases up to a full guillotine rupture of a dock transfer line.

- *Prior to the end of the draft EIS comment period, AGDC should file with the Secretary the following information that supports the marine impoundment system volumetric capacity at the Liquefaction Facilities:*

a. details of the surveillance and shutdown provisions that demonstrates that a 1-minute sizing spill release duration plus de-inventory from full guillotine failures upstream and downstream of the ESD valve on a dock LNG transfer line would be the governing case for the impoundment sizing spill at the dock, including details on detection and shutdown times based on dispersion modeling and manufacturer data, valve closure times, associated surge analyses, and reliability levels (e.g., SIL 2 or higher); and

b. AGDC should provide a hazard analysis, with the input and output files using a validated hazard model for the pool spread, vapor evolution and dispersion, and fire over the dock and water, demonstrating that allowing 10-minute releases to back up onto the dock and overflow onto the water would not affect off-site areas (e.g., publicly accessible areas) or create cascading damage to the LNG carrier, the dock, and equipment, considering effects such as cryogenic embrittlement of metal, rapid phase transitions, radiant heat, and other potential effects; or

c. alternatively to a. and b. above, documentation that the design of the marine impoundment system would safely contain the full 10-minute sizing spill release plus de-inventory, from full guillotine failures upstream and downstream of the ESD valve on a dock LNG transfer line, without backing up onto the dock and radiant heat impacts affecting the LNG carrier."

IND52-2

This part of the LNG distribution system must be designed and constructed with long life and the ability to maintain the system.

I urge the Commission to require AGDC to get this right.

IND52 - Peter McKay (cont'd)

On 10-02-2018 FERC submitted Letter Request 034 to ACGC. On 05-24-19 AGDC responded to the FERC Letter Request 034, RFI-561-FERC-034-2. Do you feel this is adequate? Are you fully satisfied with the detailed Cook Inlet crossing plan? IND52-3

I notice that the OFFSHORE PIPELINE ON-BOTTOM STABILITY ANALYSIS AND PROTECTION REQUIREMENTS cited in the Response Table 13 includes only an evaluation of 42-inch (pipeline) western route (Route Rev B) results. This study indicates: "The stability designs will be re-evaluated and optimized along the route when updated geotechnical information is available."

In section 2 "Summary section" of The Offshore Pipeline Stability Analysis the report states: "The soil conditions along the pipeline route show a varied mix of sand, gravel, cobbles, silts, and clays. In the absence of geotechnical information along the route, a soil friction value of 0.7 is used, assuming medium dense, sandy soil. The stability design of the pipeline is also very sensitive to this factor." This choice of a single "average" soil friction value is overly simplistic and does not truly evaluate the danger of possible lateral movement of the subsea pipeline. Only when the actual route is evaluated can a valid conclusion be drawn.

"The un-buried section of the pipeline requires 3.5 in. of concrete with 1.25 in. of steel thickness. For the buried section of the pipeline in shore approaches, a concrete coating thicknesses of 2.7 in. is required to achieve the specific gravity of 1.3 with the same steel thickness. The uniform concrete thickness of 3.5 in. is selected with 1.25 in. steel thickness for the entire offshore section of the pipeline."

As far as the nearshore and offshore pipeline in Cook Inlet - Are you comfortable with the Pipeline Construction Plans as well as the Right-of-Way Operational Monitoring and Maintenance plans? Are the 30-year integrity assurance plans adequate?

The Pipeline and Hazardous Material Safety Administration (PHMSA) notified Alaska Gas Development Corp. (AGDC) that they must comply with performance-based requirements of 49 CFR 192.327(f)(2). I noted the AGDC response that asserts that concrete encased pipe will meet these specifications.

"The pipeline design with the planned 3.5-inch concrete coating, FBE coating, and 1.25-inchthick steel walls was found to exceed the minimum requirement for absolute lateral static stability (DNV-RP-F109) and exceed the requirements for negative buoyancy (vertical stability) with a safety factor of 1.1."

What does the statement "exceed the requirements for negative buoyancy (vertical stability) with a safety factor of 1.1" mean? Is this the same as saying that it has 110% of the negative buoyancy required to keep the pipeline on the bottom? That doesn't seem like very much "spare" downward force.

What is the estimated buoyancy of sub-sea pipeline if concrete casing is damaged or fails after 20-25 years? (loss of concrete weight).

IND52 - Peter McKay (cont'd)

Is the buoyancy of the pipe affected by the temperature and pressure of the methane gas within the pipe? This possible variation does not appear to have been considered in the calculations. IND52-4

Is the PHMSA concerned about the (negative) buoyancy of the sub-sea pipeline if gas flow is stopped for an extended time and the chilled gas in the pipeline returns to ambient temperature? IND52-5

Cook Inlet Sub-sea pipelay detail regarding field welded joints: IND52-6

1. How many joints?
2. Will these welds be 100% inspected?
3. Will there be a corrosion inhibitor applied?
4. If so - How long is the curing time for this coating?
5. Is PHMSA OK with planned installation if the field welded segments (between factory concrete coated segments) is not coated or externally protected?
6. In Construction and Operations - What are the Go/No-Go distances for (sand wave, trench or boulder etc) unsupported sub-sea spans?
7. In Construction and Operations - What is the Go/No-Go depth that the pipeline must be buried at the nearshore approaches. Nearshore installation details included in the 5/24/19 AKLNG Supplemental Filing describe an open trench pipeline installation that will backfill "In the very nearshore (600 to 800 feet) section, the trench will be backfilled immediately; further offshore in the trenched section, natural infill is expected to occur." If this "natural infill" does not provide the required cover? What then?
8. How are pipeline Go/No-Go spec's field verified for conformance? Is there a plan for deviations from specifications such as a waiver application that can be submitted to PHMSA?
9. Construction and Operations – what are the promises to maintain the pipeline? Inspection frequency for smart pig runs, external pipeline surveys to verify sand wave free spans, concrete coating integrity, or boulders rolled against the pipe?

How will these performance specifications be verified?

Page ES-8 states: FERC's environmental and LNG engineering construction inspection programs would ensure compliance with AGDC's commitments and the conditions of any FERC Authorization. How far will this quality control extend? In my opinion truly independent Quality Control is vital to delivery of a satisfactory project which includes both the construction and 30 year O&M. IND52-7

The nearshore pipeline execution plans still in flux. How can this EIS be progressed prior to completion of the nearshore crossing details and the public and technical review of these plans? The Commission asks AGDC (on page 4-192) to provide detailed shore crossing plans. Until these are provided the EIS process should not continue. IND52-8

IND52-4 The estimated buoyancy of sub-sea pipe with damaged concrete coating would depend upon the extent of the damage. If the concrete coating is still intact around the pipe, there may not be any loss of negative buoyancy.

IND52-5 The temperature of the gas and whether it is flowing or not in the pipeline would not change the buoyancy of the sub-sea pipeline.

IND52-6 The pipeline construction and materials must be inspected by the Operator in accordance with 49 CFR 192.305 and 192.307. PHMSA would conduct construction and operational inspections of the pipeline for the life of the Project.

IND52-7 Our environmental inspection, compliance monitoring, and post-construction monitoring programs are discussed in section 2.4 of the final EIS. Project operation, maintenance, and safety procedures are discussed in section 2.5 of the final EIS.

IND52-8 Section 4.3.3.3 of the final EIS has been updated to address this comment.

IND53 – 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 – Direct Micro Tunnel Continuation

In general, I support the Direct Micro Tunnel (DMT) Continuation nearshore pipeline installation technique that combines a direct micro-tunnel out from the shoreline to ~5000 of horizontal reach, combined with an open trench (using a marine excavator/hopper etc.) method that takes the pipeline to ~41 Mean Low Low Water (MLLW) where it will transition to the direct lay pipeline installation method (pipeline installed on the bottom for the ~27 mile crossing) IND53-1

The DMT Continuation installation method would not require the bluff to be cut down to create a ramp down to the waterline for pipeline installation (as compared to the open trench pipeline installation method) and has the potential to minimize the disturbance of the nearshore area (beach) and tidal areas. This is potentially good for set-net fishermen who fish in the area and other beach users. However with the DMT Continuation method there remains the possibility of a conflict between fishermen and the "pull barge" and the support vessels installing anchors that would hold the pull barge in place. IND53-2

Another drawback of the DMT Continuation method is the construction phase disturbance of this method is largely shifted to the nearshore community which would have exposure to a large onshore work site at the bluff top. This worksite is where pipe will be fabricated into lengths to be driven by the boring machine (that will drive the ~48" bit), and pulled beneath the beach and the nearshore area out to maximum distance that this installation method is capable of. This DMT Continuation technique requires a large footprint and a lot of heavy equipment. The worksite for this pipeline installation method is not suitable for a residential neighborhood. However - this worksite does belong in an area that is already industrialized. IND53-3

At the risk of repeating myself - I firmly believe that the Nikiski nearshore route should not come ashore in the Suneva Lake area as is currently planned in the AGDC route C2 revision. Suneva Lake is a residential community that has ~10 family homes within 0.5 miles of the proposed construction worksite. Instead the Nikiski nearshore pipeline arrival site should be the West Alternative as described in the DEIS 3.6.1.2 Cook Inlet West Alternative beginning on IND53-4

IND53-1 Comment noted.

IND53-2 Section 4.11.3 of the final EIS discusses potential impacts on commercial fisheries. Coordination with federal and state agencies as well as the ADF&G would further define and mitigate impacts, as necessary. AGDC would develop a Recreational and Commercial Fishing Construction and Mitigation Plan in coordination with the ADF&G. AGDC has also indicated it would engage commercial fishing representatives and other marine resource users with early and substantive communication regarding construction activities that could affect commercial fishing operations.

IND53-3 Comment noted. Section 4.9.1.2 of the final EIS has been updated to address this comment.

IND53-4 Comment noted.

IND53 - Peter McKay (cont'd)

Page 3-19. The West Alternative arrives in Nikiski Bay which has a shallow sloping nearshore approach through the tidal areas. The bay approach has fewer visible boulders (when viewed at very low tide) and much lower bluff height that seems as if it would be well suited to the DMT continuation method. If the DMT method can get out ~5000' then that is nearly outside of Nikiski Bay. Nikiski Bay has been used successfully for other pipeline installations. There appears to be plenty of room for another. IND53-5

The intrusive construction phase top of bluff onshore disturbance is not limited to the the DMT Continuation method as this worksite/disturbance would also be required for the Open Trench pipeline installation method too.

When the construction is completed at the worksite (with either pipeline installation method) there remains the 30-year impact from the pipeline Operation and maintenance. What will remain at the bluff top workspace after pipeline construction is the pipeline in the ground, Main Line Block Valve (MLBV), Heliport and other structures (perhaps including electrical devices, instrumentation, communications and cathodic protection) that will persist at this workspace in the community for the lifetime of the pipeline – at least. Some impacts of the cleared work area and pipeline right of way are scars on the landscape and habitat that will last much longer. IND53-6

IND53-5 See the updates to section 3.6.1.2 of the final EIS.

IND53-6 Comment noted. Impacts from operation of the Project are discussed throughout the EIS.

IND53 - Peter McKay (cont'd)

Develop drawings of the proposed construction site at MP793 (including MLBV-28, Heliport, pipeline fabrication yard, Pioneer camp etc.). Traffic plan, winter maintenance plan, fences and exclusion zones. IND53-7

IND53-7 Comment noted.

IND54 – Peter McKay

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 –

IND54 - Peter McKay (cont'd)

We have asked for drawings that show the layout of the work area.

We have asked for a list of the equipment that would be used at the work area.

We have asked for the dates that the worksite would be cleared, the dates the project would begin to be used for fabrication, the duration of the worksite use. We want to know what the permitted working hours are. What will happen to our road? Will the

We have asked for The date when the

.e proct has not provided answers regarding: a Pioneer Camp. My question about the MLBV and the hazard from venting and noise pollution, About the heliport? (Landing lights? Proximity to MLBV? If there is a gas release how close can a helicopter land? Illuminated wind sock?

IND54-1

An important factor in selecting the West Nikiski Pipeline landing is to reduce the likelihood of encountering Archeological resources. The Route C2 shore landing at Suneva Lake has not been subject to full evaluation. This is an area that is rich in Native history.

3.6.12 Property value and health impacts on residential areas. Both.

Nikiski Gas to Liquids plant is inside the fence line of the LNG facility. Are there plans for DR&R of the GTL site.

End-of Useful Life of Plant & Pipeline.

IND54-2

- What is the estimated useful life of the Prudhoe Bay and Nikiski LNG plants, pipelines and facilities?
- What assurances will the LNG owners make regarding the Dismantlement, Removal and Restoration (DR&R) of the LNG facilities and pipeline?
- Will there be a fund or performance bond established for the DR&R of these facilities and pipeline?

IND54-1 Comment noted.

IND54-2 AGDC states that the proposed facilities would have a nominal design life of 30 years once operational (see section 2.1.1 of the final EIS). Abandonment of the facilities would be subject to state and federal laws/regulations at the time of decommissioning. The Commission does not require a fund or performance bond for abandonment of facilities.

IND54 - Peter McKay (cont'd)

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 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 heartily 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-GRZZZ-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 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 pipeline installation method.

I urge the Commissioners to require the Project to conduct detailed 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

IND54-3

IND54-3 See the updates to sections 3.6.1.2 and 4.3.3.3 of the final EIS.

IND55 – Peter McKay

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 resource the detailed mapping of the nearshore approaches.

DRAFT BELOW_____

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

Date: 09-18-2019

In DEIS S*ection 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.f 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. ().*" IND55-1

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-020AGDC.

IND55-1 See responses to IND11-1 through IND11-6.

IND55 - Peter McKay (cont'd)

In the AGDC response I found "Suneva Lake Pipeline Crossing Scour Analysis" and Section 2.2. "Suneva Lake Volume Determination". IND55-1

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 encourage Commissioners to require 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 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, outflow considerations and scour analysis.

In my opinion - this "*Trip Report – Suneva Lake Reconnaissance, dated August 9, 2019 by Mr. Richards and Mr. Engel*" does not satisfy the FERC Staff Recommended Mitigation No. 20.

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 eliminates the potential conflict with a residential neighborhood – especially as the nearshore construction takes place.

IND55 - Peter McKay (cont'd)

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

Document Content(s)

McKay Comments CP17-178 4MP and Mitigations.PDF.....1-25

IND56 – Barbara and Ross Njaa

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

January 29, 2020

Re: Docket No. CP17-178-000
Alaska Gasline Development Corporation Supplemental Filing Environmental Data Request Date: 12-20-2019

Dear Ms. Bose and members of FERC:

I have some concerns in regard to the Alaska Gas Development Corporation's response to information that needed to be addressed before the Federal Energy Commission would continue the permitting process. The AGDC response made valid points in favor of their Mainline Rev C2 route, one being the difficulties in entering Nikishka Bay with the LNG pipeline as it would be entering a zone with multiple pipelines already in place and the anchor array required to secure the LNG pipeline might disrupt existing infrastructure. However, serious reconsideration of options within the bay were not done. "Potential landfall alternatives in Nikiski Bay were considered and eliminated for further development by the Project early in the routing process. "(RFI-641-ENV-005) After reading the ADFG response carefully, I was struck by the phrase "early in the routing process". I think the West Alternate Route needs to be reconsidered carefully; the Cook Inlet West Alternative is the best choice if the LNG pipeline is constructed. IND56-1

The Cook Inlet West Alternative is the best choice, with perhaps modification as it enters Nikishka Bay; perhaps bringing the pipeline in just south of Boulder Point and then up a moderate bluff, proceeding inland along the original Mainline Rev C2 route instead of through the center of the bay to the LNG facility that is to be built. This more northerly egress from Cook Inlet just south of Boulder Point would avoid the industrial clutter in the bay, affect just one commercial fishing family – as the current C2 route does at present – and would leave two miles of undeveloped land in that state of no development which is desirable for wildlife habitat. The West Alternative with a small modification would avoid the noise sensitive areas of the C2 route where a pipeline staging facility would be built directly in the backyards of several year-round rural residents. Currently, the Kenai Peninsula Borough is planning a land sale in this area within the year, so the number of residents in the area will increase. In addition, the IND56-2 IND56-3

IND56-1 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS.

IND56-2 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS. The alternative route's eastern landfall location lies north of the industrial area and just south of Boulder Point.

IND56-3 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS.

IND56 – Barbara and Ross Njaa (cont'd)

swath of land that would then need maintaining periodically over the land portion of the pipeline would be much shorter and would be accessible from the Arness Dock industrial area, leaving a large tract of wilderness intact. IND56-3

A major point that has been minimized in the Alaska LNG response is the scour threat potential posed by Suneva Lake which would affect the proposed C2 pipeline crossing. In 1972 when the lake washed out, I was 19 years old and living here on the beach less than a mile from the lake. On the Inlet end, a homesteader had constructed a dam of sorts, then demolished the existing beaver dam to bring the lake closer to his home. When that dam broke, my family and I saw trees falling, and large chunks of land caving away as we gathered to watch. What had been a little creek flowing down to the Inlet became a ravine. The lake, no longer a home for swans and other water creatures, gradually became a grass-filled basin with alder growing up along the shoreline. My family and I would drive over to visit the Huhndorf family along a trail in the lakebed. In the 1980's, Quality Asphalt constructed the present earthen dam with a culvert and the lake refilled. Beaver moved back into the lake. People who live nearby clear brush out of the large culvert mouth periodically when the water rises, threatening the dam integrity. I remember well the power of rushing water that day in 1972 which would have had no problem taking a pipeline with it. The Alaska LNG Response states: "However, based on the past 34 years of performance of the current Suneva Lake dam structure, a significant winter/spring flood event with ice flow is unlikely." (RFI-641-ENV-014) In geologic time less than fifty years is just a blip… not long enough to speak with certainty that such an event is unlikely to happen again. IND56-4

In conclusion, based on the AGDC LNG Response statement "Potential landfall alternatives in Nikiski Bay were considered and eliminated for further development by the Project early in the routing process.", and because of my own knowledge of the scour potential of Suneva Lake, I oppose the C2 Route for the proposed LNG pipeline. The West Alternative can be done, although there are logistical problems to be surmounted. The desires to build the liquid gas pipeline and preserve wilderness habitat would both be met with the West Alternative Route. Thank you for your consideration, IND56-5

Sincerely,

Barbara and Ross Njaa

IND56-4 See the updated discussion regarding Suneva Lake Dam in section 4.1.3.10 of the final EIS.

IND56-5 Comment noted.

IND56 – Barbara and Ross Njaa (cont'd)

20200130-5010 FERC PDF (Unofficial) 1/29/2020 8:38:51 PM

Document Content(s)

FERC Response Jan 29-20.DOCX.....1-2

IND57 – Robert Breeden

Thursday, January 30th, 2020
Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Docket CP17-178-000, RFI-641-ENV-005
Western Alternative Route as a Condition of Final EIS to Preserve Boulder Point, Alaska

Dear Ms. Bose:

As a resident of Boulder Point, Alaska, I am intimately familiar with Boulder Point, and the habitat and of this undisturbed natural part of Alaska that exists as it has since man first arrived upon the land. The following is a compelling rebuttal to the letter from AGDC to FERC dated December 20, 2019. This project EIS can be approved in a manner that preserves Boulder Point - by FERC staff and Commissioners stipulating the Western Alternative a condition of the Final EIS. The environment can be preserved, and the pipeline built by utilization of the Western Alternative crossing of the Cook Inlet into Nikiski Bay. IND57-1

Thank you for this opportunity to comment, and FERC's regulatory guidance to the project. Approving the Final EIS while taking into account habitat protection and citizen's concerns is the healthy way our US system works. IND57-2

As well, The Western Alternative pipeline route has political support. Charlie Pierce, the Mayor of the Kenai Peninsula Borough, has written a letter in support or using the Western Alternative routing, as beneficial to his constituents. IND57-3

Here are responses to the points in the December 20th AGDC letter:

Residences and Residential Areas:

Numerous additional residences and residential land are affected by over 5 miles of unnecessary pipeline through Boulder Point in the applicant's proposed C-2 route. In contrast, fewer parcels, and no new parcels are affected in the Western Alternative, as the pipeline will come ashore into a Kenai Peninsula Borough parcel already slated to be crossed by the pipeline. IND57-4

This prevents direct impacts to many privately held parcels. Furthermore, while the applicant's December letter states that landowners over which the pipeline crosses will be compensated, many affected parcels and affected landowners whose properties are adjacent to but not crossed by the pipeline would not receive compensation. IND57-5

Wildlife and Vegetation:

IND57-1 Comment noted.

IND57-2 Comment noted.

IND57-3 Comment noted.

IND57-4 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS. Land use impacts for the Project are discussed in section 4.9.1.3.

IND57-5 Comment noted.

IND57 – Robert Breeden (cont'd)

The Schwartz and Franzmann, 1991 State of Alaska study clearly concludes Boulder Point is the epicenter of habitat for Black Bear feeding activity which travel from hundreds of thousands of acres to Boulder Point, seeking this densest concentration of Devils Club on the Kenai Peninsula for its nutritious and plentiful berries, which is the necessary component of their annual nutritional needs. The study concludes that without Devil's Club, Black Bear females cannot carry embryos to term, or nurse them once born in the den. A map in the study has migration route arrows leading to Boulder Point from as far as 30 miles away for critically feeding window of late summer to store fat before hibernation. Impacts to the Boulder Point Black Bear feeding area must be avoided. That the applicant also referenced this study in the December letter, (a State study which the residents first brought to FERC's attention last year), and still intends to be the greatest physical impact ever to this habitat is unconscionable. IND57-6

Furthermore, the unique terrain of Boulder Point is the best remaining Moose nursery on the Kenai Peninsula. Regarding Moose, no study has been done to quantify this prodigious moose concentration area, and the environmentally sound method would be to avoid pipeline disturbances without adequate analysis of the real disturbances a pipeline corridor would cause to this very protective and productive habitat for Moose. IND57-7

Regarding Beluga habitat, studies have shown that the critical habitat is along the north shore of the Cook Inlet, where Belugas feed, breed and live, not on the south side, where 2 additional miles of pipeline would be laid in the water with the Western Alternative. The applicant states this extra 2 miles of underwater pipe, in addition to over 25 miles of proposed underwater pipe, would add only 5-6 additional days to complete the pipelaying process. The balance of 5-6 days of a barge parked in the Cook Inlet, versus permanent, forever impacts of over 5 miles of pipeline corridor cutting straight through virgin Bear and Moose habitat, weighs heavily towards the Western Alternative. Additionally, the applicant states that only a 10 foot wide clear zone along the pipeline corridor must be kept open, but in reality the applicant's plans show they will be building a permanent 140 foot wide graded easement, with wider sections for curves and steep slopes. This is December letter understates the true impact to this habitat. IND57-8 IND57-9

The Risk of Suneva Lake Dam Outburst:

The channel cutting erosion effects are nearly impossible to model, taking into account the compounding factors of 1) Lake Ice of various thicknesses, 2) Earthquake, and 3) Armoring of Soils by Frost at varying depths. To date, no calculations of the heat generated by the pipeline keeping the local soil thawed, combined with a frozen solid Sockeye Avenue Road crossing of Suneva Canyon, creating a frost-armored weir. Water and ice blocks from 2.5 mile long Suneva Lake pouring powerfully down this weir over 35 feet near vertically onto the thawed souls covering the pipeline would create a deep hole, as is found below a waterfall. The sudden outburst of Suneva Lake, as already occurred in 1972, remains a direct perilous risk to the pipeline as proposed by the applicant. Numerous existing residences, and residentially desirable land lies in close proximity the Suneva Lake canyon, and would be at risk during such a catastrophic event. AGDC has not engineered for the eventuality of a sudden outflow of water draining 3 mile long Suneva Lake, or to protect residents should such a calamity occur. The Western Alternative avoids this crossing entirely, and is the responsible choice. IND57-10

IND57-6 Impacts on bear are discussed in section 4.6.1.3 of the final EIS.

IND57-7 Impacts on moose are discussed in section 4.6.1.3 of the final EIS.

IND57-8 Comment noted.

IND57-9 AGDC would use construction mode 5A for installation of the Mainline Pipeline in the Boulder Point region. As described in section 2.2.2 of the final EIS, the temporary construction workspace would be up to 150 feet wide and the permanent right-of-way would be 53.5 feet wide. A 10-foot-wide corridor over the pipeline would be maintained in an herbaceous state during operation to facilitate corrosion and leak surveys as discussed in section 2.5.2 of the final EIS. The remaining workspace would revert to previous condition over time, as described in section 4.5.3 of the final EIS.

IND57-10 See the updated discussion regarding Suneva Lake Dam in section 4.1.3.10 of the final EIS.

IND57 – Robert Breeden (cont'd)

Constructability of Shoreline Approaches:

Four successful pipelines have been laid into Nikiski Bay to date. There are no compelling reasons why a 5th pipeline could not be laid into Nikiski Bay. IND57-11

Anchoring within Nikiski Bay:

The bottom of broad Nikiski Bay is nearly all good holding ground for anchors. There are multiple methods of anchoring that will not cross existing pipelines, as stated as a concern by the applicant. Little creative thought in anchoring is necessary to develop a substantial anchoring plan. If proximity to shoreline is a concern, heavy equipment could easily drive the long gravel shoreline, and place fixed mooring bollards on the gravel beach, to be removed after the barge has completed its work. There is minimum of mile, and often much more clear width to work within Nikiski Bay along the entire Western Alternative Route.

The reasons stated above are valid reasons to utilize the Western Alternative routing. With the Condition of Approval being specified as the Western Alternative pipeline route within the Final EIS, this becomes the Environmentally protective method for the project to proceed. The Condition of the Western Alternative will be a job well done, and a bright delight of FERC Staff and FERC Commissioners who approve the EIS WITH THE CONDITION of utilizing the Western Alternative Route. IND57-12

Sincerely,
Robert Breeden
Boulder Point, Alaska

IND57-11 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS.

IND57-12 Comment noted.

IND57 – Robert Breeden (cont'd)

20200203-5042 FERC PDF (Unofficial) 2/1/2020 8:35:41 PM
Document Content(s)

Copy of Boulder Point.DOCX.....1-3

IND58 – Debbie McKay

February 8, 2020

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

Re: Docket No. CP17-178-000
Alaska Gasline Development Corporation Supplemental Filing Environmental Data Request
Date: 12-20-2019

Dear Ms. Bose and FERC Commissioners:

I thank you for considering the views of our neighborhood and hearing our voices. I have many concerns regarding the pipeline approach proposed by AGDC identified as Rev. C2 (Boulder Point area).

1- The environmental impacts of a pipeline in an untouched, pristine area would be catastrophic and unnecessary. This is a residential neighborhood with several fishing families that make their living here. AGDC wants to turn our neighborhood into a huge industrial site. The impact from the noise alone will harm the environment, for both humans and animals. A heliport, man camp, heavy equipment and noise from building the pipeline less than ¼ mile from 6 families that make their homes here would destroy the lives we have spent decades building. Our homes would immediately depreciate. IND58-1

There has been no talk of compensating us for our losses. The area in Nikiski Bay – Rev. B – is already established and heavily industrialized. There would not be additional harm to the environment with that route. And several successful pipelines already in the area prove that it is possible. There is a mile of open space there, plenty of room for an additional pipeline. IND58-2 IND58-3

The existing pipelines run through Critical Beluga habitat. The IND58-4

IND58-1 Section 4.9.1.2 discusses impacts on this neighborhood, and finds that, with implementation of mitigation measures for residences, impacts on the Boulder Point community would be temporary (lasting during the construction period) and less than significant. There would be no regular helicopter trips to the MLV near Boulder Point during construction, and an average of one helicopter trip per month to this site for periodic planned maintenance. Impacts on property values are discussed in section 4.11.8.3 of the final EIS.

IND58-2 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS. The alternative route makes landfall north of the industrial site.

IND58-3 See response to IND58-2

IND58-4 Relative to the proposed route for the Mainline Pipeline, the Cook Inlet West Alternative would increase the length of pipeline construction within Cook Inlet beluga whale critical habitat, as described in section 3.6.1.2 of the final EIS.

IND58 – Debbie McKay (cont'd)

Belugas are already familiar with that route and manage to avoid and coexist, (not withstanding the four Belugas that washed up on our beaches this past year) but AGDC's plan of a different and separate route through Critical Beluga habitat would further erode their environment and shrink their safe territory. IND58-4

In **Table 1: Comparison of Mainline Rev C2 MP 765.1 to MP 797.6 and the Cook Inlet West Alternative in the DEIS**

Residences and Residential Areas

"AGDC evaluated the presence of Noise Sensitive Areas (NSAs) within 0.5 mile of a noise source (e.g., compressor station, trenchless construction). Based on the information AGDC has, fewer NSAs are located within 0.5 mile of the DMT entry/exit locations for the proposed Mainline Rev C2 route than for the Cook Inlet West Alternative.

Based on AGDC's current database of potential residential dwellings and land ownership, more land parcels and unique landowners would be affected by the proposed Mainline Rev C2 route than by the Cook Inlet West Alternative; however, the difference in numbers is minor and does not provide the alternative with a significant environmental advantage over the proposed route. Landowners would be compensated for use of the pipeline easement during Project operations."

The number of parcels crossed for the Rev. C2 Boulder Point route is 58 vs. 44 for the Rev. B West Alternative route. Unique property owners affected for Rev. C2 is 8, vs. 3 for the Rev. B West. Forested Land Use for Rev. C is 3.5 miles, vs. .33 for the Rev. B West. Open land use is 2.22 miles for the Rev. C2, vs. .10 for the Rev. B West route. IND58-5

1- NSA's. I'm not sure what the criteria is for identifying a noise sensitive area (NSA), however, there are no private residences within .5 miles of the Rev. B West Alternative that I know of, and certainly none within .25 miles. Furthermore, as the Rev. B route is already a highly industrialized area, what's the point? I see that they specify the .5 miles for their measure of the NSA's. Here in our neighborhood, most of us would be well under .25 miles of the Rev. C2 Boulder Point route. Some much less than that at under .10 miles. There are eight home owners in this neighborhood that would be directly affected by this project, and 4 more property owners, one that is in the process of IND58-6

IND58-5 The comment provides information on the number of parcels crossed for routes studied by AGDC, but these routes do not correspond with the Cook Inlet West Alternative analyzed in section 3.6.1.2 of the final EIS. Moreover, while the number of individual parcels crossed can be a useful comparative factor when the differences are great, we consider proximity to residences to be a more salient factor for this analysis. There are no residences within 150 feet of construction workspace along the Cook Inlet West Alternative or corresponding segment of the proposed Mainline Pipeline route.

IND58-6 We have added a recommendation in section 4.16.3.2 of the final EIS that AGDC provide a noise analysis if the DMT continuation method is used for the shoreline crossing.

IND58 – Debbie McKay (cont'd)

building now. Also, the borough has just opened up more parcels for sale in the area, so there is the possibility for more home owners in the future that would be affected. IND58-6

2- Also, their statement: "**Landowners would be compensated for use of the pipeline easement during Project operations**." is somewhat vague. What does that mean exactly? Will they pay for us to relocate during the project operation? Will they be testing the air and water here to make sure that they are not polluting our neighborhood during the operations? IND58-7

3- The number of parcels crossed for the Rev. C2 Boulder Point route is 58 vs. 44 for the Rev. B West Alternative route. Is this 44- 1 acre parcels? Or 44- 20 acre parcels. I have a hard time seeing that the amount of land parcels is that close for the two routes when the Rev. B West Alternative is skipping 3.5 miles of forested property. This wording is also very vague. IND58-8

4- Unique property owners affected for Rev. C2 is 8, vs. 3 for the Rev. B West. Again, I'm not sure who the unique property owners in the Rev. B west would be, as that area is highly industrialized. Are they speaking of the existing oil and gas industry in the area? IND58-9

5- Forested Land Use for Rev. C is 3.5 miles, vs. .33 for the Rev. B West. Open land use is 2.22 miles for the Rev. C2, vs. .10 for the Rev. B West route. IND58-10

6- I am including photos of two currently inhabited eagles' nests that are both within .25 miles of the proposed Rev. C Pipeline at Boulder Point. The first is nearly on the beach. The second one is on the shores of Lake Suneva. I apologize for the poor quality of the photos. It is difficult at this time of year to access these areas for photos, and as you can see these photos were taken during the summer. I felt that I needed to get this letter in IND58-11

IND58-7 As described in section 4.9.2.2 of the final EIS, AGDC would negotiate easement agreements with private landowners. In cases where easement agreements between AGDC and a landowner cannot be reached, local courts would determine compensation for an easement, consistent with state law regarding eminent domain (AS 09.55.240 through 460).

IND58-8 See response to comment IND58-6.

IND58-9 See response to comment IND58-6.

IND58-10 See response to comment IND58-6.

IND58-11 Bald and golden eagles, their range and habitat preferences within Alaska, and results of historic raptor nest surveys within the vicinity of the Project are discussed in section 4.6.2.4 of the final EIS. Project construction and operational activities that could affect bald and golden eagles, specifically during sensitive periods (e.g., breeding and nesting seasons), are also discussed in section 4.6.2.4 of the final EIS. AGDC would implement measures to reduce impacts on bald and golden eagles, such as following the 2007 USFWS *National Bald Eagle Management Guidelines* and maintaining buffer distances between eagle nests and activities.

IND58 – Debbie McKay (cont'd)

sooner rather than later. If you would like or need better photos, I'm sure I would be able to figure something out. IND58-11

IND58 – Debbie McKay (cont'd)

7- Our Kenai Peninsula Borough Mayor, Charlie Pierce, does not support the route proposed by AGDC. He has requested that AGDC utilize the Rev. B West Alternative. His words from the letter he submitted to FERC on October 2, 2019: ***"Pipeline Routing – Boulder Point Area: I support the proposed West Alternative pipeline approach into Nikiski Bay as opposed to the route that would reach landfall at Boulder Point. That area is aptly named as it is littered with boulders which I believe would increase short term and long term project costs. Further, this would address concerns raised by residents of the Boulder Point community regarding the proposed pipeline route to and through their neighborhood."*** IND58-12

IND58-12 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS.

IND58 – Debbie McKay (cont'd)

8- The Rev. B West Alternative route is the best route for this project. I think there are arguments to make for utilizing the existing corridor and congregating the pipelines in one area rather than spreading it out all over Nikiski. The proposed route, C2 Boulder Point will involve unnecessary significant environmental harm. It will negatively affect our neighborhood including: noise pollution, our access to clean air and water, the wildlife and habitat. Why invade new habitat when there is a better alternative? Please take this into account when you are considering the proposed permit for this project. IND58-13

Thank You Very Much,

Sincerely,

Debbie McKay

IND58-13 Comment noted.

IND58 – Debbie McKay (cont'd)

20200210-5041 FERC PDF (Unofficial) 2/8/2020 6:47:10 PM
Document Content(s)

February 2020 FERC. public comments.DOCX.....1-6

IND59 – Peter McKay

February 14, 2020

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

RE: FERC Docket No. CP17-178-000
Alaska Gasline Development Corporation
Public Comments on Supplemental Filing Environmental Data Requests
Comment Date: December 20, 2019

From: Peter McKay
55441 Chinook Rd
Kenai, AK 99611
mckayped@yahoo.com

Ms. Bose,
On November 22, 2019 FERC staff sent a letter requesting that the current applicant – Alaska Gasline Development Corporation (AGDC) - provide additional environmental data.
On December 20, 2019 AGDC submitted a supplemental filing in response to the Environmental Data Request (Letter Request No. 005 – AGDC ID No. RFI-641-ENV-005)).
With this letter I am submitting my public comments regarding the AGDC response.

Although the public comment period for this docket is closed, there are several inaccuracies in the AGDC Supplemental Environmental Data Request response that should be addressed. Without correction these statements would stand unchallenged. This could lead the FERC Commissioners to conclude that the Nikiski LNG Pipeline Cook Inlet shore landing at Suneva Lake as described in Route C2 is the least environmentally damaging route. It is not. IND59-1

In fact – this C2 near shore approach route, pipeline shore landing creates an entirely new pipeline corridor segment of about 3.5 miles and would cause unnecessary environmental destruction. It would change this residential area from undisturbed to industrial. This route would result in needless loss of wildlife habitat. This pipeline route would disrupt several commercial set-net fishing sites, disturb nesting eagles and cultural sites and cause irreparable harm to our close knit Suneva Lake neighborhood. These neighborhood disruptions would exist for the pipeline construction year(s), but would also persist for the service life of the pipeline. The pipeline, Main Line Block Valve (MLBV), Heliport, Cathodic protection, area and building lighting, and metering and communication structures (etc) would remain in our neighborhood. In fact if the AGDC proposed route C2 is built, when the next generation of families lives here in the Suneva Lake / Boulder Point area there is a very good chance that the scars of the pipeline installation would still be visible. There is no firm plan to remove the pipeline, the MLBV or other structures when the LNG stops flowing. DR&R (dismantlement, removal, and restoration) obligations remain deferred and vague promises. IND59-2

IND59-1 Comment noted.

IND59-2 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS. Land use and visual impacts in the Boulder Point area are discussed in sections 4.9.1.3 and 4.10.2.2 of the final EIS, respectively. Facility abandonment is addressed in section 1.7 of the final EIS. See the responses to comments IND57-9, IND58-1, and IND58-5.

IND59 – Peter McKay (cont'd)

There is an existing pipeline corridor in service in Nikiski Bay where several Cook Inlet pipelines come ashore. It is an environmental best-practice to avoid creating new pipeline corridors where a reasonable alternative is already in service. The new pipeline should follow the near-shore corridor with the other existing Cook Inlet pipelines. The shore landing of the AGDC LNG Cook Inlet pipeline should be located in Nikiski Bay which is a reasonable alternative to Route C2. Despite what AGDC states, this DEIS West Alternative shore landing does provide significant environmental advantage. IND59-3

Because of many public comments by affected landowners and the U.S. Environmental Protection Agency (EPA) FERC asked AGDC to provide an updated analysis of the "DEIS West Alternative". IND59-4
AGDC did a comparison of Mainline Rev C2 MP 765.1 to MP 797.6 vs. the Cook Inlet West Alternative in the DEIS in Table 1 along with their reply comments dated 12-20-2019.
This DEIS West Alternative route was very similar to the route that AGDC had proposed in Rev B. The AGDC West Alternative route is modified to make a pipeline shore landing in Nikiski Bay near MP 798. Myself and other proponents of the DEIS West Alternative have primarily limited our public comments to the pipeline shore landing site in Nikiski.

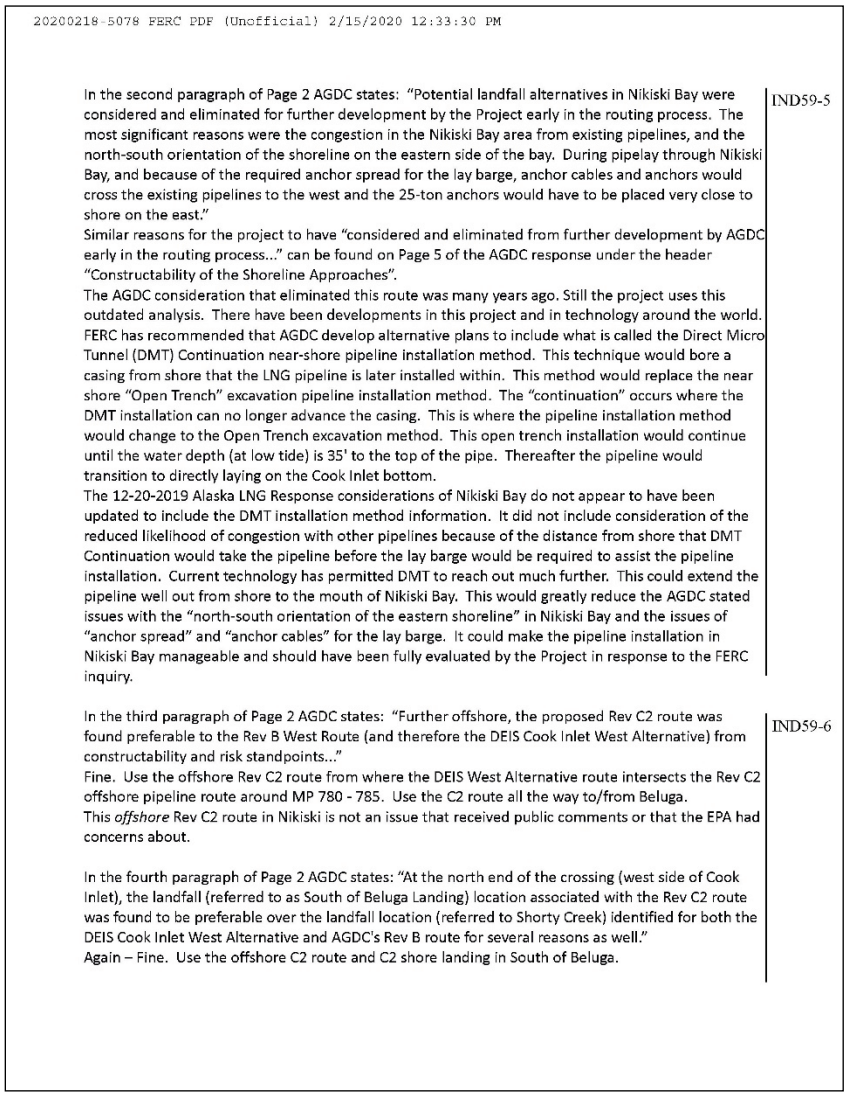
The examination and comparison of the "DEIS West Alternative" route suggested by public comments as an alternative to the proposed C2 route advocated by the Suneva Lake neighbors refers only to the near-shore approach and shore landing of the pipeline in Nikiski Bay. The rest of the Cook Inlet pipeline crossing route is not specified or of great concern to those of us who commented. A review of public comments on file with FERC will show that the public comments and focused area of concern is not the Beluga (north or west) end where the LNG pipeline is proposed to enter Cook Inlet, nor the LNG pipeline route across Cook Inlet, but with the proposed pipeline near-shore approach and landing in Nikiski.
FERC asked AGDC to evaluate these concerns stating:
"These comments address the potential for impacts on residences and residential areas, wildlife and vegetation, and land uses; proximity to the Suneva Lake Dam; and constructability of the shoreline approaches. Provide an updated analysis of the Cook Inlet West Alternative addressing these concerns. The updated analysis should include assessments and comparisons of the following criteria for each route: FERC then lists 14 criteria to evaluate.

The AGDC response to the FERC request compares the West Alternative to Route C2.
The Rev C2 shore LNG pipeline landing at Suneva Lake would be in our residential community.
The West Alternative that many public comments were submitted on refers only to the near-shore approach.
I have made public comments supporting bringing the pipeline ashore in Nikiski Bay. I have not intended my comments regarding the DEIS West Alternative to include the full AGDC Rev B route. As far as I am concerned – the LNG pipeline Cook Inlet crossing can use the C2 or any other AGDC preferred Inlet crossing route – as long as it comes ashore in Nikiski Bay and not at "Suneva Lake".

IND59-3 See the updates to the analysis of the Cook Inlet West Alternative in section 3.6.1.2 of the final EIS.

IND59-4 Comment noted.

IND59 – Peter McKay (cont'd)



20200218-5078 FERC PDF (Unofficial) 2/15/2020 12:33:30 PM

In the second paragraph of Page 2 AGDC states: "Potential landfall alternatives in Nikiski Bay were considered and eliminated for further development by the Project early in the routing process. The most significant reasons were the congestion in the Nikiski Bay area from existing pipelines, and the north-south orientation of the shoreline on the eastern side of the bay. During pipelay through Nikiski Bay, and because of the required anchor spread for the lay barge, anchor cables and anchors would cross the existing pipelines to the west and the 25-ton anchors would have to be placed very close to shore on the east."
Similar reasons for the project to have "considered and eliminated from further development by AGDC early in the routing process..." can be found on Page 5 of the AGDC response under the header "Constructability of the Shoreline Approaches".
The AGDC consideration that eliminated this route was many years ago. Still the project uses this outdated analysis. There have been developments in this project and in technology around the world. FERC has recommended that AGDC develop alternative plans to include what is called the Direct Micro Tunnel (DMT) Continuation near-shore pipeline installation method. This technique would bore a casing from shore that the LNG pipeline is later installed within. This method would replace the near shore "Open Trench" excavation pipeline installation method. The "continuation" occurs where the DMT installation can no longer advance the casing. This is where the pipeline installation method would change to the Open Trench excavation method. This open trench installation would continue until the water depth (at low tide) is 35' to the top of the pipe. Thereafter the pipeline would transition to directly laying on the Cook Inlet bottom.
The 12-20-2019 Alaska LNG Response considerations of Nikiski Bay do not appear to have been updated to include the DMT installation method information. It did not include consideration of the reduced likelihood of congestion with other pipelines because of the distance from shore that DMT Continuation would take the pipeline before the lay barge would be required to assist the pipeline installation. Current technology has permitted DMT to reach out much further. This could extend the pipeline well out from shore to the mouth of Nikiski Bay. This would greatly reduce the AGDC stated issues with the "north-south orientation of the eastern shoreline" in Nikiski Bay and the issues of "anchor spread" and "anchor cables" for the lay barge. It could make the pipeline installation in Nikiski Bay manageable and should have been fully evaluated by the Project in response to the FERC inquiry.

IND59-5

In the third paragraph of Page 2 AGDC states: "Further offshore, the proposed Rev C2 route was found preferable to the Rev B West Route (and therefore the DEIS Cook Inlet West Alternative) from constructability and risk standpoints..."
Fine. Use the offshore Rev C2 route from where the DEIS West Alternative route intersects the Rev C2 offshore pipeline route around MP 780 - 785. Use the C2 route all the way to/from Beluga.
This *offshore* Rev C2 route in Nikiski is not an issue that received public comments or that the EPA had concerns about.

In the fourth paragraph of Page 2 AGDC states: "At the north end of the crossing (west side of Cook Inlet), the landfall (referred to as South of Beluga Landing) location associated with the Rev C2 route was found to be preferable over the landfall location (referred to Shorty Creek) identified for both the DEIS Cook Inlet West Alternative and AGDC's Rev B route for several reasons as well."
Again – Fine. Use the offshore C2 route and C2 shore landing in South of Beluga.

IND59-6

IND59-5 Both the proposed route and the Cook Inlet West Alternative must take into account the possibility that open cut construction would be necessary if pipeline installation is unable to be completed using the DMT continuation method. Our assumption is that AGDC would install the pipeline via the DMT continuation method for either route, but both routes must also be suitable for standard open cut installation in the event that DMT is infeasible.

IND59-6 Comment noted.

IND59 – Peter McKay (cont'd)

This *west side* Rev C2 pipeline route and transition to land South of Beluga Landing is not an issue that received public comments or that the EPA had concerns about. IND59-6

Under the header "Residences and Residential Areas" on Page 4 of the AGDC response there is the following: "AGDC evaluated the presence of Noise Sensitive Areas (NSA's) within 0.5 mile of a noise source (e.g., compressor station, trenchless construction). Based on the information that AGDC has, fewer NSAs are located within 0.5 mile of the DMT entry/exit locations for the Mainline Rev C2 route than for the Cook Inlet West Alternative." IND59-7
These statements are not correct. There must be a problem with the "information that AGDC has". That information is flawed or incomplete. The conclusion that there are fewer NSAs in Route C2 is utterly false. There is a much greater human impact associated with Route C2 where at least 10 residential dwellings are located within 0.5 miles of the pipeline centerline.
There is also the significant heavy equipment and construction noise from the proposed "Fab site" where lengths of pipe will be assembled prior to pulling these from shore to the near-shore (DMT installed) casing.
In addition to trenchless construction pipeline installation noise, I would consider a Heliport as a significant source of noise to be considered. The Project does not include this in the evaluation.
It should be noted that many Cook Inlet platforms are serviced from the OSK dock and heliport located in Nikiski Bay. The heliport operates many flights to/from the platforms each day. The increase in flights to service the LNG Main Line Block Valve (MLBV) and associated equipment would be negligible to that industrial area. Also since this LNG shore equipment would be on the road system (MP 798 is adjacent to Nkishka Beach Road) – it would be possible to access the MLBV by road or by sharing the OSK heliport that is located nearby. The proximity to the road system would also benefit constructability of the pipeline. The logistics of bringing DMT equipment, pipe and pipeline fabrication equipment to the very remote site (route C2 Suneva Lake shore landing near MP 793) would be very challenging. To instead choose to bring the LNG pipeline shore landing to Nikiski Bay would result in a significant cost savings while reducing environmental impact. IND59-8

Under Residences and Residential Areas on the Second paragraph AGDC states: "Based on AGDC's current database of potential residential dwellings and land ownership, more land parcels and unique landowners would be affected by the proposed Mainline Rev C2 route than for the Cook Inlet West Alternative; however, the difference in numbers is minor and does not provide the alternative with a significant environmental advantage over the proposed route. Landowners would be compensated for use of the pipeline easement during Project operations." IND59-9
This statement acknowledges negatively impacting more "*potential* residential dwellings and land ownership, more land parcels and unique landowners". The Project then goes on to minimize the difference calling it "minor". These landowners would not call the difference "minor". The Project response then raises the issue of landowners getting compensation – as if that excuses an unnecessary environmental injury to the affected landowners of my community. Unless I am mistaken – this compensation is limited to landowners who have their property crossed by the pipeline.
It must also be noted that the number of *actual* affected residential dwellings (not "*potential*" dwellings) in route C2 is much greater than the shore arrival in Nikiski Bay near MP 798.
The only conclusion can be that the DEIS West Alternative (shore arrival at Nikiski Bay) *does* provide a significant environmental advantage. It should be selected.

IND59-7 We have added a recommendation in section 4.16.3.2 of the final EIS that AGDC provide a noise analysis if the DMT continuation method is used for the shoreline crossing. See the response to comment IND58-1 regarding helicopter traffic to the MLV near Boulder Point.

IND59-8 Comment noted.

IND59-9 See the response to comment IND58-7.

IND59 – Peter McKay (cont'd)

In the June 2019 DEIS, 3.6.1.2 Cook Inlet West Alternative on Page 3-20 is the statement: IND59-10
"Finally, the West Alternative appears to present a less favorable location for a trenchless crossing, and if an open-cut crossing is required, shoreline disturbance would be greater. Consequently, we conclude that the West Alternative is feasible and would provide some advantages compared to the proposed route; however, it would not provide a significant environmental advantage over the proposed route."
I do not agree with this conclusion. I believe that it is based on flawed information and assumptions. Instead, I conclude that there is a significant environmental advantage to the DEIS West Alternative.

On September 24, 2019 I submitted DEIS Public Comments: McKay Comments Docket CP17-178 Route C2 Process. IND59-11

"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 does not appear to have functioned properly - as far as the pipeline Route C2 revision goes."

I contrast the give and take and community outreach given to the many pipeline route revisions through Denali Park with the lack of Nikiski route Rev C2 shore landing public engagement. This Nikiski C2 route issue should have been resolved by now. It would have been resolved if the Project had reached out to the community and involved affected residents of Nikiski. The Project has been less than forthcoming about the development they have planned in our Suneva Lake/Boulder Point neighborhood. The Project has consistently understated the environmental effects of the Nikiski C2 pipeline shore landing at Suneva Lake.
As I stated in my September comments: "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."

For the many reasons that I have raised in this letter, I respectfully request that the Project review their data and take a fresh look at the DEIS West Alternative (Nikiski Bay shore landing).

IND59-10 Comment noted.

IND59-11 Comment noted.

IND59 – Peter McKay (cont'd)

20200218-5078 FERC PDF (Unofficial) 2/15/2020 12:33:30 PM

Document Content(s)

McKay 2-14-20 Response to AGDC Supplemental Filing.PDF.....1-5

IND60 – Anne Huhndorf

February 14, 2020

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

RE: Docket CP17-178-000, RFI-641-ENV-005
Western Alternative Route as a Condition of Final EIS to Preserve Boulder Point, Alaska

Dear Ms. Bose,

For the past 25 years, Stan Huhndorf and I have lived at the drainage north of Lake Suneva dam, IND60-1
right on the beach near Boulder Point, Alaska. We are quite familiar with the area. Stan's parents homesteaded on the east side of Lake Suneva, starting back in the mid 50's. Stan has lived here all his life. I have lived here for the past 30 years. We raised our four children here. The Huhndorf family has commercial fished on this beach for 70 years. We continually teach our children our native culture that has been passed down to us by many generations before us. The fourth generation of our family is learning our native heritage by subsistence living, commercial fishing, and how to appreciate this pristine, undisturbed habitat that surrounds us here, at Boulder Point.

Our property, Property ID: 01302034 & 01302033, is adjacent to the proposed LNG pipeline project. East of us, the proposed route Rev. C2, Boulder Point, would have the LNG pipeline emerging from the Cook Inlet and following close to our property line and crossing Sockeye Ave, and then Lake Suneva canyon. On the west side of our property line is the pond which is

IND60-1 Comment noted.

IND60 – Anne Huhndorf (cont'd)

fed by Lake Suneva. South of the pond is known as Lake Suneva canyon. We have not seen an engineered plan from AGDC, that would address a sudden catastrophic event due to this proposed pipeline that is slated to run under Sockeye Ave., and across the Lake Suneva canyon. IND60-2

I can't stress the importance of how fragile Lake Suneva and its dam is. If this lake were to go out like it did in 1972, our property would be directly affected, along with Sockeye Ave. that crosses Lake Suneva canyon. It would also affect our two neighbors who utilizes this road to get to their properties. AGDC does not appear to have a plan to address any potential issues concerning this area.

The pond is exceptionally fragile. Every year, during the spring and summer months, we must physically clear the culvert at the dam due to a family of beavers that like to dam the culvert. If we don't clear this culvert, the dam gets soggy and the pond below gets very low. Where is AGDC's attention to this fragile ecosystem? My concern is of a possible leak from the buried pipeline crossing Lake Suneva canyon, which would leak chemicals into this pristine pond. IND60-3

This pond that is formed from the drainage of Lake Suneva, is on our property before it drains into the Cook Inlet. It is home to many varieties of waterfowl that arrive in the spring, waiting for Lake Suneva to emerge from winters' freeze. This pond hosts: two pairs of swans, numerous eagles, ducks, sandpipers, muskrats, porcupines, coyotes, black bears and brown bears, as well as moose. There is an eagle's nest in a tree above this pond, and another one up on the shore of Lake Suneva. The first nest is close to the dam on the eastside of Lake Suneva. It can be seen when one is standing on the dam, looking southeast. The eagles use Lake Suneva canyon to fly from one nest to the other. We also see belugas swimming in Cook Inlet near the pond.

IND60-2 See the updated discussion regarding Suneva Lake Dam in section 4.1.3.10 of the final EIS.

IND60-3 Comment noted.

IND60 – Anne Huhndorf (cont'd)

I have attached a few pictures that I have taken over the years. There's a delicate ecosystem here. We respect this property and the wildlife that also calls this place home. We are fortunate to spot many different animals that cross our land to drink from the pond that is part of our property. IND60-3

I, along with political support from Charlie Pierce, the Mayor of the Kenai Peninsula Borough, the Salamatoff Native Corporation, and many of my neighbors, recommend utilizing the Western Alternative route (Rev. B West – Nikiski Bay). Please keep the pristine land at Boulder Point and Lake Suneva that has been home to our neighbors, and our families who continue subsistence lifestyles, intact. These lifestyles were practiced by Alaskan Natives for thousands of years before us. IND60-4

I've always called my home, "Suneva By the Sea." If this proposed project goes through, I don't want to be known as, "Suneva by the Heliport."

Thank you for your time and consideration.

Anne Huhndorf
Boulder Point Resident

IND60-4 Comment noted.

IND60 – Anne Huhndorf (cont'd)

Black bear on a cottonwood tree on our property.

IND60 – Anne Huhndorf (cont'd)

A pregnant lynx crossing our lawn during the spring. (proposed route Rev. C2, in the background)

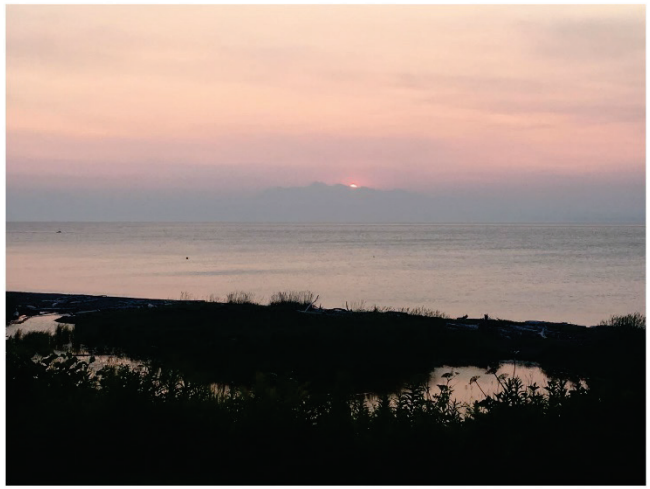
IND60 – Anne Huhndorf (cont'd)

An early morning rendezvous on our lawn. (proposed route Rev. C2, adjacent to the east side of our property)

IND60 – Anne Huhndorf (cont'd)

Moose on the beach walking between the pond and Cook Inlet.

IND60 – Anne Huhndorf (cont'd)



Pond created by Lake Suneva and empties into Cook Inlet.

IND60 – Anne Huhndorf (cont'd)

20200218-5105 FERC PDF (Unofficial) 2/15/2020 11:14:21 PM
Document Content(s)

Revision 5 for Anne.DOCX.....1-8