

## Denali Citizens Council



Advocating for Denali's Wilderness, Wildlife and Way of life.

October 14, 2014

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### **Re: Scoping period for the Supplemental Alaska Stand Alone Pipeline Environmental Impact Statement**

Ms. Romero (or other interested parties):

Please accept these comments regarding the scoping period for the Supplemental Environmental Impact Statement (SEIS) for the Alaska Stand Alone Pipeline on behalf of the Board of Directors and approximately 300 members of the Denali Citizens Council. The Council, founded in Cantwell in 1974, provides education and advocacy on important land and wildlife issues in the gateway communities of Denali National Park. Our members, many of whom live and work along the proposed route of a small diameter pipeline adjacent to Denali National Park, would only support a project that can be accomplished in an environmentally appropriate and fiscally responsible manner. We are unsure that this can be done, given the many foreseeable impacts of a small diameter gas pipeline running through our communities, private properties and important recreational lands.

In fact, as we have reviewed materials associated with construction of a small diameter pipeline along the Parks Highway along the entire distance between Fairbanks and Anchorage, we've concluded that the impacts and fiscal uncertainties of this project in our region are simply too great, and we would favor Alternative 4.3.3 of the initial EIS, which stipulates a larger diameter line along the TAPS corridor either to export, or more likely to an LNG facility in southcentral Alaska, with spur lines to centers of need such as Fairbanks and Anchorage. This larger diameter line is likely to be more fiscally sustainable and eliminates the complications associated with setting aside an entirely new right of way for much of the line, as would be needed with the ASAP. Additionally, a larger TAPS line meets the needs described for the project, without the negatives associated with the proposed smaller diameter line, which include limited benefits and multiple negative impacts to local and regional landowners.

Despite the fact that we feel the proposed ASAP is neither feasible nor desirable as described, we still wish to comment during the scoping period for the SEIS. We have listed topics that we feel have been inadequately considered or require more development in the SEIS on the following pages.

*The SEIS is improved in some areas, although still leaves room for improvement.* We appreciate that the maximum pressure within the pipeline has decreased. As previously proposed, this pipeline would be the highest pressure pipeline traveling

through residential areas. Still, we have concerns about the safety of local residents related to pipeline malfunctions, seismic activity, and other, as-yet unknown, circumstances.

We see that there is still a need for mainline block valves spaced intermittently, with a total of 39 sites. We remain concerned with the siting of numerous aboveground valve stations in residential areas or areas of concentrated use. Again (as with material sites) these locations are buried within maps, and not easily accessible to the public without specific direction to the map, or a considerable amount of time by the public spent searching for locations. This should be remedied, and a Draft SEIS should include citations of maps and other relevant information in order for the public to obtain the information needed to comment as needed. For example:

- Special consideration should be given in the Nenana Canyon area around highly used tourism areas.
- Residential areas and other areas with concentrated use within the Denali Borough (including subdivisions and uses related to tourism) are not suitable for any kind of block valve release stations or other facilities. Any temporary or permanent aboveground facility, including access roads, should not be allowed in these areas, or (at a bare minimum) be used only when absolutely necessary.
- In the case of an event that requires increased activity at these sites (such as a system blowdown), the impact to residential areas and other areas with concentrated use in the Denali Borough would be significant, and should be considered.
- Alternatives for permanent aboveground facilities should be clearly explained in the SEIS, so that the public has an opportunity to comment on site-specific concerns, and provide alternatives for permanent facility location.

The location of aboveground facilities and other temporary and permanent land use should be fully transparent. Aboveground facilities should be identified in a way that is understandable and clear, so that the public has a legitimate opportunity to fully realize the cumulative effects, and have the opportunity to point out these localized effects. Identifying the locations of aboveground facilities and other land use in an assortment of tables and maps is inadequate without full disclosure and citations.

The mitigations and location-specific descriptions are vaguely described, and an incredible amount of information is left to future permitting processes or plans, or not adequately described in this EIS. It is our opinion that, if the project were ever to be seriously considered, there are a number of EIS-level implementation plans still needed to cover succeeding phases of this project.

***The Supplemental Environmental Impact Statement (SEIS) should consider alternative routes along existing corridors (such as the Trans-Alaska Pipeline (TAPS) corridor, Richardson Highway and Parks Highway through Denali National Park and Preserve).***

Giving the same amount of consideration for all alternatives in the SEIS will provide an opportunity for public review, and an opportunity for public comment specific to each

alternative. If along the Trans Alaska Pipeline System (TAPS) corridor, the proposed ASAP pipeline could travel within 12 inches of the existing oil pipeline. Using the existing TAPS corridor would have substantially fewer negative impacts by avoiding the clearing and maintenance of an entirely new right of way. This should be considered.

*If the pipeline must travel along the Denali Bypass (Yanert) route or the Parks Highway corridor, rather than the TAPS corridor, additional measures must be included to reduce impacts.*

Detailed information should be provided regarding access roads, water sources and material sites within the Denali Borough for all alternatives.

- Access roads, material site development and other activities during construction will have permanent impacts that must be considered. For example access roads that are cleared will permanently change the trail system and impact habitat fragmentation. While these impacts may be localized, they should not be ignored at this stage.
- Engineers should keep in mind that this pipeline, by creating road access, will open the Montana Creek area to further development within the Denali Borough. Under the proposed scenario the pipeline would require safety precautions similar to those required in currently more densely populated areas. It is our understanding that additional safety precautions such as a thicker pipeline, are not currently contemplated for this area. This is short-sighted, if safety is truly a concern.
- Much of the proposed infrastructure, including access roads and material sites within the Denali Borough are, simply put, bad ideas. Consideration should be given to alternatives that do not have such high, localized impacts to residents, and these alternatives should be prioritized. A clear description of how the public can be engaged in these decisions should be included in the SEIS.

Detailed information should be provided on pipeline design in areas of high seismicity, including the Denali Borough, so that residents are given an accurate picture of what development is proposed. This should not be postponed or left up in the air, and should be a consideration for all alternatives. There is little discussion of how different construction options will be selected in areas of high seismicity. Fault lines are prevalent in the Denali Borough along the proposed route and the DNPP route variation. This is a critical concern throughout the Denali Borough and should be more thoroughly discussed.

Impacts to the view shed (see section 8.2.13), particularly around Denali National Park should be considered for all alternatives, and should take into account whether the pipeline will be above or below ground. The existing visual resources survey did not consider access roads, material sites, and other temporary or permanent impacts to the viewshed. It should. According to the POD (p. 91), “With the exception of a short segment in Prudhoe Bay, and several potential short, aboveground sections near water crossings or pigging facilities, the pipeline will largely be buried and not visible.” This vague statement leaves potential impacts to visibility (related to whether the pipeline will be above- or belowground) unclear. In order to provide substantive comments, residents should be provided with information that facilitates a clear understanding of where exactly the pipeline would be above- or belowground. This clarification should be open for public comment, particularly where the

proposed pipeline crosses residential land, as well as lands visible from highly used areas that have scenic values.

A new scenic overlook on the Denali Park Road (Government Hill scoping, summer 2014) is anticipated to provide scenic viewing opportunities overlooking the Riley Creek railroad trestle and natural vistas. Any right of way for the pipeline is directly within this line of site, with development outside of existing developed corridors creating a significantly larger impact. Even in areas that already are impacted, this additional scar should not be discounted. The proposed pipeline right of way would also be visible from numerous other locations in Denali Park heavily used by thousands of visitors. The significant impacts to visual resources as a result of this project should not be ignored.

Industrial projects are inappropriate next to a scenic highway and in an area whose tourism economy promotes scenic landscapes, outdoor recreation and undeveloped lands. Development along existing right of ways seems to minimize this impact over the long-term, and should be given equal consideration to all other alternatives.

A full-scale Health Impact Assessment, overseen by the State of Alaska, should be required for a project of this size to address impacts to individual and community health. Ideally, this would be managed by the state, rather than completed by the applicant or a contractor, to ensure that unbiased consideration is given all factors that need to be considered.

*Local input must be considered and deemed highly important, since the route in the vicinity of the Parks Highway corridor will have substantial negative impacts and no clear benefits to locals.*

Avoid sensitive areas and undeveloped land such as around the Yanert River. This area in particular has a long history of importance to local residents (recreation, non-motorized hunting opportunities, and innumerable other values). Do not use the Yanert Road for any part of this project.

The proposed route bypassing Denali National Park into the Yanert Valley has multiple negative impacts. Cutting over to the east from the Nenana Canyon into the Montana Creek Valley will create erosion problems on the side of Sugarloaf Mountain, and will create a visible scar along the pathway of the pipeline, within the viewshed of virtually the entire entrance area of Denali National Park and Preserve. The Montana Creek area is undeveloped at this time and provides corridors for wildlife movement and a pristine viewshed for thousands of visitors every summer.

The Yanert Valley, through which this pipeline would travel on the bypass route, is a major recreational area, and although the pipeline is currently designed to occupy the North – South intertie corridor in part of the Yanert Valley, additional clearing for pipeline infrastructure will no doubt be required, as well as fencing for areas that must be kept secure. Such activities could easily interfere with recreation and complicate the movements of wildlife in this area. Access to this part of the pipeline from the Parks Highway would be limited. Locals oppose the building of access roads through residential areas, or other locally valued locations. Such isolation will complicate both spill and accident-response and render general maintenance more expensive.

One example of proposed activities would be a new access road to a material site that would travel through the McKinley Village residential area. This is inappropriate for numerous reasons, including:

- Concentrated residential use should be separated from heavy industrial uses, whether by proximity to actual structures, or access through an existing residential area.
- Access roads do not have a clear plan for rehabilitation, and according to the POD (p. 103) would depend on consultation with landowners. In areas where existing residential subdivisions or concentrated public use occurs, and in areas with high value to local residents (including the area surrounding the McKinley Village residential area), this delay is inappropriate.

Avoiding the Parks Highway to travel around Denali National Park and Preserve ignores federal legislation (Denali National Park Improvement Act, S. 157) intended to provide an option that would be comparable to a Richardson Highway alternative (another existing transportation corridor). Consideration of impacts should include (at a minimum) a comparison of routes within the existing Parks Highway right of way (through Denali National Park and Preserve) and the Richardson Highway right of way, as well as the proposed Denali bypass.

- According to the Plan of Development (p. 63), “The bypass was assessed in the ASAP project EIS (USACE, 2012) and remains the preferred alternative put forth by AGDC in its 2014 draft Joint Application for Permit (AGDC, 2014). The route intentionally avoids disturbance of a national park and includes mitigation for minimizing visual and noise disturbances on adjacent lands that could potentially be noticed by park visitors.” The POD goes on to state that there were “efforts to identify potential risk associated with constructing the pipeline near a highly sensitive area such as DNP&P.” It is unclear from the public record how the decision was made to bypass the park, or why this alternative was ignored. This should be fully disclosed, and available for public comment.
- The new legislation (allowing for travel through Denali National Park) constitutes a significant enough change to available options that it should be given increased consideration as an alternative in the SEIS.
- Refusing to consider the full range of options, and impacts from each right of way option, fails to consider the full range of reasonable alternatives that are available for this project.

Residential lands surround the Parks Highway within the Denali Borough. As proposed, the current ASAP alignment and associated access roads are not based on the Parks Highway alignment and instead travel through nearby concentrated residential areas. Yet justifications depend on suggestions that the pipeline travels along the Parks Highway. This is inaccurate.

- It is unclear why the plan has changed to avoid existing right of way corridors. Instead of following existing transportation corridors, the right of way now deviates from existing corridors substantially, much more than initially proposed, and with

little to no explanation. The right of way alignment should consider existing developed corridors wherever possible.

- According to the POD, “In some areas, the ASAP route will parallel or lie adjacent to existing corridors, helping to minimize disturbance to visual resources.” Why is this standard not used throughout the route?
- Instead, according to mitigation measures found in 8.2.13, there is a proposal to “shift the pipeline away from existing ROWs frequented by the public during transit or other activities to help mitigate against disturbance to visual resources in several areas.” In fact, locating the pipeline in certain areas, including the bypass around Denali National Park and Preserve does nothing to reduce visual impacts, and instead increases potential impacts to visibility.
- The POD considered visibility impacts where the pipeline ROW travels through BLM lands, but gives few specific mitigations related to the visibility impacts to adjacent federal lands, including several heavily used scenic views (that the proposed pipeline right of way would be visible from) within Denali National Park and Preserve). Increased consideration of impacts to this international destination must be included.

In general, additional information is requested within the Denali Borough regarding:

- Amount of surface and subsurface water use
- Material sites and amount of proposed use
- Proposed access road alignments, both temporary and permanent
- Siting information for any permanent facilities

Numerous items that DCC pointed out during the Draft EIS process were deferred to the UA ACE’s 404 permitting process (see Appendix S, Public Comment Matrix). To date, there has been no follow up information that we are aware of, and we request information about what this timeline will be, and how we can receive additional information regarding the public procedures that come with this process.

We appreciate the opportunity to submit comments on this important scoping period for the SEIS, and are interested in having ongoing communication with your agency. Please feel free to contact me with any questions.

Sincerely,

/s/ Hannah Ragland

DCC Board of Directors, President

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