Denali Citizens Council
Serving to protect Denali National Park and environs
PO Box 78 Denali Park, Alaska 99755 907-683-3396 www.denalicitizens.org

March 5, 2012

Mary Romero**,** Project Lead, ASAP
U.S. Army Corps of Engineers
P.O. Box 6898 (CEPOA-RD-S)
Elmendorf AFB, Alaska 99506-0898
Mary.R.Romero@usace.army.mil

Ms. Romero,

Please accept these comments regarding the Draft EIS for the Alaska Stand Alone Pipeline on behalf of the Board of Directors and ~250 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**, which stipulates a larger diameter line along the TAPS corridor either to North America, 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 on the Draft EIS. We have listed a few topics in the DEIS that are inadequately considered or require more development on the following pages.

1. We're doubtful that this pipeline can be constructed and maintained with sufficiently strong safety provisions to avoid damaging events. Given the exceptional nature of such a high pressure line, especially one that is traveling through residential and developed areas, additional discussion of safety concerns is needed.

- The EIS states that ASAP "would be the first 2,500 psi transmission pipeline to operate in a public area within the USA," adding that "this proposed pipeline would be among the highest pressures currently planned for natural gas transmission lines in the US."

- Construction plans and mitigations related to seismicity, mass wasting and the unique conditions associated with permafrost (including thaw due to disturbance, frost heaves, etc.) are vaguely discussed and not clearly identified. Delaying development of these mitigations until a further date leaves it unclear at this time how these concerns would be addressed, and what this would look like on the ground.

- 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.

- A mainline valve (MLV) is identified at mile 538.3 of the mainline. This is adjacent to the developed entrance area outside DNPP, at a point where the Nenana River valley narrows into a rocky canyon, with a considerable amount of erosion and mass wasting. It is unclear where exactly this MLV would be located, as it's location is listed as a mile point (in Table 5.11-2, oddly included with Visual Resources, but not in sections related to land use or other facilities), and is not identified in any maps we have found in the EIS. This MLV should be relocated because of safety concerns, both due to the narrowness of the Nenana Canyon in this area, traffic congestion as the road funnels into the canyon, and, of course, falling rocks. It should also be noted that this particular MLV is 27 miles away from the next MLV to the north, while the EIS states that MLVs are required by law to be placed (no more than) every 20 miles. Mitigation measures do not, and could not, address this concern. This is likely not the only MLV site along the length of the pipeline, or in the Denali Borough that is unreasonable due to safety or other concerns. Alternative sites should be identified and considered. In general, any aboveground facility, including MLVs, should not be allowed in residential areas, or in other areas of concentrated public use, or 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 developed areas in the Denali Borough, would be considerable.

2. 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 <u>still needed</u> to cover succeeding phases of this project.

- It is stated that, *"Project-related effects to soils and geology would be mitigated with measures identified during the Project's final design phase such as the implementation of construction BMPs."* This does not provide

adequate information to assess the cumulative impacts, or ensure that they are acceptable. This EIS should provide public opportunities for input on mitigation measures and best management practices. These standards should be clearly stated now, rather than during the "final design" phases.

- The project divides the Denali Borough into two vast regions, lumping the area between Fairbanks and Denali National Park, and south from DNPP to tidewater. Lumped together as it is, the impacts in and around the Denali Borough (and other regions for that matter) are difficult to ascertain. In addition, because all of the parts and pieces of the EIS are divided into separate documents (both online, and the digital copy provided locally at the public library), it is difficult to search through related actions and issues discussed in different sections of the EIS.

- Expansion to the intertie is mentioned as a connected action in the Executive Summary, but not explained in other sections of the EIS. This action, combined with clearing of the pipeline right-of-way, would mean significant habitat fragmentation and impacts to visual resources, of particular concern considering the proximity to Denali National Park and Preserve. Thousands of people visit Denali National Park and Preserve each year to enjoy the beauty of this wilderness park. We ask that every effort be made to hide the visible impacts of the pipeline from viewpoints along the Denali Park Road and popular visitor destinations.

- The Executive Summary (page ES-20) states that *"As a result of the anticipated increase in use, airports that would be used to support construction of the ASAP Project may require upgrades to improve runways, lighting, communications, or navigational aides."* The Healy airstrip is identified. Could other local airports be considered for possible "improvement"? Further discussion of airport improvements does not appear in Section 3 as a connected action. Who would be responsible for these upgrades, and who would be expected to cover these costs?

3. Impacts to residents' health and well-being and private property owner's rights are inadequately addressed in the Draft EIS.

For example, the EIS does not provide enough information to address the cumulative impacts that current and future surface and sub-surface withdrawals would have on the health of local residents.

- It is unclear where the large quantities of water needed for this project would be withdrawn. Water requirements within the Denali Borough are unclear, as it the Borough is divided between two vast "spreads" (Table 5.2-22). The cumulative need for water identified in these two "spreads" totals over 400 million gallons of water. Without identifying the locations of surface water withdrawal, or even how much would be withdrawn from a more narrowly defined region (a specific watershed for example) there is not enough information to come to conclusions on the cumulative impacts to surface water, and the associated impacts with groundwater renewal and other natural processes, or the impacts to humans or habitat. It is presumptive to assume that there will be little impact to water resources without identifying more specifically where this water would come from.

- Identified surface and subsurface water availability, quality, and current uses within the Denali Borough are severely lacking. For example, current surface water withdrawals in the Denali

Borough associated with public supply, domestic self-supplied, industrial self-supplied, irrigation, livestock, aquaculture, and mining are "unknown." Only surface water use associated with thermoelectric power is "known."

- Current and approved future developments in the Denali Borough that would withdraw large amounts of water from local water bodies are dismissed or not addressed in this EIS. This includes water use associated with power generation, underground coal gasification and coalbed methane/natural gas exploration.

Impacts to property owners could be substantial, and are left unaddressed.

- The EIS states (page 5.9-13) that, *"Private lands in the Project area are used for residential, agricultural, and commercial purposes. As private land, land uses are subject to approvals of the landowner."* This does not take into consideration that private land use may be appropriated through the process of eminent domain. This does not give landowners "approval" of land uses, and should be explicitly addressed.

4. Development on some lands may be unacceptable, for a variety of reasons, and should not be approved based on mitigations alone.

- The 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 would oppose the building of access roads. Such isolation will complicate both spill and accident-response and render general maintenance more expensive.

- If the ASAP is to be constructed, we prefer using the Parks Highway corridor route through the national park, to avoid the Yanert bypass. Legislation defining a process to obtain a right of way through the national park is pending in Congress, so the national park route, though carrying its own impacts, is possible.

- The narrow canyon of the Nenana River will make it very difficult to site a pipeline along the highway, so extreme caution will be necessary to ensure safety and maintain a reasonable flow of traffic. The one mile stretch through "Glitter Gulch" that is lined with hotels, restaurants, and wayward pedestrians will create challenges for builders and safety problems during the busy summer season.

- The locations of aboveground facilities and other temporary and permanent land use 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 to Alaska Gasline Development Corporation (AGDC). Identifying the locations of aboveground facilities and other land use in an assortment of tables and maps, scattered throughout the EIS with minimal descriptions, is inadequate.

- Material sites should be included in tables that identify disturbed acreage (Table 2.1-3). While it's acknowledged that the extraction of material from sites will have impacts, the EIS does not include material sites along with other areas affected by project construction and operations.

- While the EIS identifies other plans for use of these material sites (Table X), there is inadequate discussion of how material sites will be shared with other current and future uses. Deferring this until later phases will only serve to exacerbate issues with material site development and expansion, and should be more thoroughly discussed here. The EIS states that, "Except for competition for scarce gravel resources, the potential for substantial negative cumulative impacts is low." The scarcity of gravel resources will certainly be a major consideration in development of this pipeline, and should be given more thorough consideration in this EIS.

- With the large number of identified material sites, a number of gravel pits have been identified that would have substantial impacts to human health and safety. Identified material sites within the town of Healy and adjacent to the local school would produce increased traffic and dust, and create safety issues for local residents, including children and families traveling to school. They should not be used, or minimally used.

- Appendix D provides a mile point and GPS coordinates along the pipeline mainline, but this only identifies where the access road originates, and not where it goes, or the route it would take to get there. Roads in and around residential and developed areas in the Denali Borough are included, and should be available for public review. The EIS should provide a full description and/or map of access routes that would be improved or developed as part of this project.

- The Draft EIS suggests that the ROW would need to be more than doubled in some areas to "implement specialized grading techniques" or accommodate other site features, but does not identify where this is necessary. AGDC should provide exact locations of such substantial increases in width, so that the public has the information it needs to comment on potential impacts to specific sites. Considering the proximity of residences to the highway corridor, this would tremendously impact residents and business owners along the Parks Highway throughout the Denali Borough. Areas that require a widened right-of-way along the DNPP route variation should be identified before a route is selected.

5. Cumulative impacts are not adequately addressed in several areas, listed below.

While some of the impacts to water bodies during construction may be localized and temporary, the cumulative impacts of construction activities in these waters will very likely have a detrimental effect that would last for a much longer period of time, and yet is dismissed.

- Effects of pipeline temperatures through discontinuous permafrost, and under bodies of water are unclear. The Draft EIS states that, *"**In concept**, the pipeline would be operated at below freezing temperatures in predominantly permafrost terrains, and above freezing temperatures in predominantly thawed-ground settings (page 5.1-20)."* It is also stated that, *"Pipeline design would use engineering controls such as insulation and strategic use of non-frost-susceptible fill to control the thermal signature of the pipeline in discontinuous permafrost (page 5.1-25)."* This EIS should discuss more thoroughly the mitigations to relieve impacts from the thermal signature of the pipeline through discontinuous permafrost. Specifically, it should include a discussion of the success of different forms of "engineering controls" in other areas with discontinuous permafrost in order to mitigate effects from the thermal signature of the pipeline. The Draft EIS does not provide information about how or whether AGDC would regulate temperatures through discontinuous permafrost, without additional aboveground facilities. It should not be assumed (i.e. "in concept") that the temperature of the pipeline would be above or below freezing temperatures as it travels through discontinuous permafrost. The Draft EIS needs to clearly discuss the environmental consequences of running a pipeline at below freezing temperatures through discontinuous permafrost or explain more clearly how the temperatures will be moderated without aboveground facilities.

- The recreational use of surface water should be given consideration in this EIS, especially considering the importance of water, especially in the Nenana River watershed, for recreation. Recreational uses provide substantial income to the Denali Borough, and impacts to water quantity would impact these values.

- Open cut isolation or horizontal directional drilling should be used at all stream crossings that contain resident or anadromous fish, or that are tributaries to bodies of water that contain resident or anadromous fish. Water body crossings should only be done during winter months when fish are not present. As proposed, several of these constructed crossings would occur during the summer season (Appendix E), including the Yanert Fork. A number of creek crossings, many of them tributaries to the Nenana River are scheduled for construction during the summer or fall, including Antler, Coyote, Dragonfly, Eagle, Fox, Grizzly, Hornet, Junco, Kingfisher, and Montana Creeks. The cumulative impacts to water quality to these and other tributaries to the Nenana River are considerable, and should not be dismissed.

- There is a considerable amount of discharge into the Nenana River, including wastewater from Usibelli Coal Mine, GVEA's Healy Power Plant, the National Park Service, and a variety of smaller scale private and commercial sources. Water in the Nenana River and associated tributaries (and adjacent water bodies that provide water through seepage and groundwater recharge) is critical to alleviate impacts from these discharges. A reduction in flow in the Nenana River, or its tributaries, could change the effects of discharges into the river, and should be addressed in this EIS.

- The EIS states that "The applicant is not planning to use any synthetic additives at this time." Synthetic additives in drilling muds should not be allowed for water body crossings (including wetlands). If synthetic additives are to be allowed, this EIS should identify them.

Section 5.5 Wildlife

- The clearing of the right-of-way, and maintenance in a non-forested state, will increase habitat fragmentation. Fencing, access roads and lighting can be detrimental to wildlife movements.

Section 5.10 Recreation

- Visitors to the area are characterized as mostly consumptive users of resources, such as hunters and fisherman. This may be true of some visitors to the area, but not for a large majority of visitors. In fact, they are mostly non-consumptive users of resources, and come from all over the world for the wild landscape and superlative opportunities to view wildlife and the tallest mountain in North America in a wilderness setting. Discussion of tourism makes no distinction between Denali National Park and Preserve (DNPP) and other areas throughout Alaska, and no distinction between travelers coming to shoot a moose (or bear, or wolf) with a gun or a camera. Most of DNPP's visitors, hundreds of thousands of them, come from around the world armed only with a camera. The experiences they seek (and the high value they place on the area's resources, beyond simply getting there) are very different from those of a hunter or fisherman, and should be given adequate consideration, which is not currently present in this EIS.

- Denali National Park and Preserve draws thousands of visitors from around the world, largely during the summer season. This influx of visitors is not dependent on resources such as fishing or hunting, as suggested in the Draft EIS, nor is it limited to "the spring and early summer…and fall." In general, Denali sees increased recreation during snow-free months, from spring to fall. While many visitors recreate primarily in the Park, an increasing number of tour opportunities are available in the surrounding area, and any construction activities in the summer will have substantial (if temporary) impacts. Considering the global reputation of Denali National Park, this impact should not be overlooked.

- The seasonal influx of visitors currently leads to substantial traffic congestion, especially around the park entrance area, but also in surrounding communities. Increased traffic to and from material sites, and at construction sites, will put a significant burden on communities in the Denali Borough.

- Construction and maintenance during the summer season will also put an increased burden on local services. Although more services are available in the summer season, the services available are not sufficient to support tourism and a 500 person work camp. Given the substantial influx of people into this area during the summer season, construction and maintenance during the summer months would have substantial impacts and should be minimized as much as possible. These impacts should be more clearly discussed in the Draft EIS. Also, there are a number of errors in the listing of services provided in the Denali Borough (Section X).

Visual Resources

- Maintaining a cleared right-of-way for the ASAP pipeline will have significant visual impacts to the area surrounding Denali National Park and Preserve, whether or not the alternative route is selected. While the visual impacts would be minimized by using the existing Parks Highway right-of-way, increased clearing along the highway will change the visual character of the area.

In addition, if seismic or other conditions make it necessary to construct the pipeline aboveground through any part of this region, it will create visual impacts, especially in proximity to Denali National Park. Many visitors travel along the Parks Highway from Fairbanks or Anchorage, via the George Parks Highway or the Alaska Railroad. Tourism to this area provides significant economic benefit to local residents and the state, and every effort should be made to minimize the visual impacts. The highway in this region is officially declared a Scenic Byway.

- Heavy use of material sites along the Parks Highway should be considered along with other visual impacts.

- While there are currently visual impacts to the view from the park entrance area, namely the cluster of development just outside the park entrance area, this should not be used as a reason to increase visual impacts. Such incremental increased will be detrimental to the integrity and quality of the visitor experience to Denali National Park and Preserve, and should be given adequate consideration.

- Alternatives in the Draft EIS for laying pipeline in areas with high seismic activity include above- and belowground options. An aboveground option would have substantial impacts to visibility, a highly valued resource in this area. Considering the Denali Borough's economic value to the state as a tourism destination, this impact should be considered carefully. It should be clearly identified whether the pipeline would run above- or belowground, and what the associated impacts to visibility would be before a route variation is selected.

- A full visual impact analysis of both the proposed mainline route (completed, Appendix K), and route DNPP variation (not included as part of the analysis in this EIS) should be conducted for comparison before selection of an alternative route.

6. Public Process – EIS staff have so far not shown a strong interest in providing for sufficient public process

- The scope of this project, and the potential associated impacts, make it critical to allow for local comments on site-specific proposals. Recent meetings were scheduled in the southern reaches of the Denali Borough, in the middle of the day. This minimizes the public opportunity to get more information and comment in person.
- AGDC representatives came to a Borough Assembly meeting in Healy to discuss land use for surveying the proposed right-of-way, but could not provide general information about what pipeline development in the Denali Borough would look like, nor details about the proposed DNPP route variation. It seems that it is in the best interest of AGDC, the state, the Borough, and local residents, for AGDC to work cooperatively with local municipalities to solicit more detailed information. For this reason we support the creation of some form of municipality or citizen advisory board. An afternoon meeting in the middle of the workweek, an hour away from the most densely populated area in the Denali Borough (Healy) is insufficient.

There are a number of inaccuracies about the services available in the Denali Borough. Because these services are used to determine the community's capacity to handle the influx

of construction workers, AGDC should consult the Denali Borough (and other municipalities for that matter) to update the EIS with accurate information.

- A local clinic (the Interior Community Health Clinic, inaccurately named "X" in the EIS) provides some medical services year-round; a physician does not staff it. There are no dental services available within a hundred miles.
- A grocery store listed in the EIS is only open four months a year.

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

Sincerely,

/s/ Nancy Bale

Nancy Bale
DCC Board of Directors
nancy@denalicitizens.org
907-277-3825