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

DENALI CITIZENS COUNCIL
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December 4, 2015

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

Ladies and Gentlemen:

Thank you for the opportunity to provide scoping comments for the Alaska LNG Project, Docket # PF14-21-000, for preparation of a Draft Environmental Impact Statement (EIS). The following comments are being submitted on behalf of the Board of Directors and roughly 300 members of the Denali Citizens Council (DCC), a local public advocacy organization, founded in Cantwell in 1974. Many of our members are long-time residents of the Denali Borough and want to see their quality of life and the integrity of wild lands and habitats in this area protected. We want the Draft EIS to consider the numerous, foreseeable impacts of construction and maintenance of a large diameter gas pipeline through our communities, properties and important recreational lands.

The Alaska LNG Project promises to be the largest project among several recently proposed to bring gas from the North Slope to southcentral Alaska, with an added export component increasing the market for Alaska gas. However, this project is unlikely to provide a long-term benefit to Denali Borough residents in the form of a ready gas supply.

At this time DCC cannot support a Parks Highway route for the LNG project, given the likelihood of severe impacts to the local quality of life, the quality of the seasonal tourist experience, the quality of regional wildlife habitat and the direction of planning for the Denali Borough. Although LNG representatives have visited the borough several times to present information on this project, they have been unable to provide a level of detail on the project route and infrastructure sufficient to overcome local doubts. We realize that at the scoping level, the Federal Energy Regulatory Commission is not seeking approval or disapproval, but rather suggestions on the environmental, socio-economic, recreational and other impacts and suggestions for alternatives that will be more environmentally beneficial. We will make those suggestions, however, overall, we oppose this route and there can be no mitigation that is likely to overcome our opposition.

Our comments follow.

1. We suggest that the Draft EIS vigorously explore using the existing Trans Alaska Pipeline System (TAPS) corridor for this LNG pipeline project, with the marine terminal at Valdez. Such a routing is preferable in a number of ways, including the following:
    a. Purchase of Rights of Way will be simpler, as the corridor and its access infrastructure already exist.
    b. A TAPS corridor route will be considerably less expensive.
    c. The TAPS corridor has already been impacted by the building of the pipeline and local resistance is likely to be much less.
    d. An export terminal in Valdez has been studied and presents environmental benefits over the proposed terminal at Nikiski, including less interference with Beluga Whales and an ice-free port without the known tidal problems that plague Cook Inlet.
    e. Seismic issues along the TAPS route are known.

2. The LNG Project pipeline cannot safely or reasonably be routed through the **Nenana Canyon** without unresolvable impacts to existing uses and the existing vision for the area. Even with assurances that the pipe will be buried, except in seismically active areas, and that infrastructure will be out of sight, we expect that the project, located in this narrow pinch-point, with its steep and rugged terrain, cannot be kept out of sight, and its visual impacts will compromise the inherent values of the Nenana Canyon.
    a. The Nenana Canyon area constitutes an emblematic **scenic resource**. As stated in the Tanana Basin Area Plan, "This area's proximity to the entrance of Denali National Park and Preserve makes it one of the state's highest visitor-use areas. Because of the river's importance to the state's residents and visitor industry, the Nenana River corridor will be managed to maintain its current character and to protect its scenic, recreational, and fish and wildlife values." (1990, p. 3-153). The George Parks Highway in this region is classified as a National Scenic Byway. The Alaska Department of Transportation has taken steps to remove commercial activities from its gravel storage areas in the canyon, and today, between the businesses at the south end of the canyon and the Moody Bridge, there is no built infrastructure. Pipeline infrastructure, removal of rock and trees in steeper areas to accommodate the pipeline corridor, widening of the highway corridor with little possibility of a tree buffer in most areas, all of these things will hamper the scenic values of the area.
    b. Fitting a pipeline project into **existing traffic plans** of the George Parks Highway in the Nenana Canyon will be difficult to achieve. The Parks Highway is the major route for commercial truck traffic between Anchorage and Fairbanks, joined by seasonally-expanded bus traffic in this area, and of course private automobiles. According to the *Parks Highway Visioning Document (AKSAS Project Number 74833)* prepared for the Alaska Department of Transportation and Public Facilities in 2006, a 2030 maximum monthly rate of 9,900 vehicles per day is expected. Seasonal traffic, commercial traffic, turning traffic, people stopped to take pictures, all of these activities have been envisioned and planned for by Alaska DOT. A pipeline corridor and associated infrastructure are likely to compete with existing transportation and visitor amenity plans for the Nenana Canyon.
    c. The existing route of the pipeline above the commercial areas at the south end of the Nenana Canyon and over to Montana Creek, even if buried, **will irreversibly affect the scenic values of this area.** Attached to these scoping comments is a scenic representation provided by Enstar for its proposed bullet line in the southern part of the Nenana Canyon that depicts the visual effects from construction of a small-diameter pipeline and associated road. Alaska LNG has yet to provide graphics indicating scenic impacts in the Nenana Canyon.
    d. As the pipeline cut travels out of the Nenana Canyon and over to the Montana Creek drainage, it will leave a scar visible from the National Park headquarters, from which tourists take hundreds of photographs every summer. In truth, the wild and scenic landscapes immediately surrounding the National Park are vital to the overall Denali tourist experience.

3. Pipeline construction and subsequent maintenance will irreversibly impact the unique recreational and habitat values of the **Yanert Valley**. This area of state land is unique geographically and is currently roadless, except for the Parks Highway at its western edge. It is well known for hiking, skiing, mushing, snowmachining, hunting and scenic tourism. The Yanert River is a wild river, with no bridges, roads or infrastructure.
    a. Local people do not support the construction of pipeline access roads from anywhere along the Parks Highway into the Yanert Valley, even if deemed "temporary." On one of the draft LNG maps, an access road is depicted along the route of the BLM 17(b) easement through Ahtna lands to the site of the pipeline. Currently this easement is regulated as a 25 foot wide trail with access only by foot, dogsled, snowmachine and small ATV. Residents are likely to oppose any change in the definition of this trail and to oppose any form of road-access into state lands in the Yanert Valley.

b. Acquisition and transportation of gravel for use in construction of the pipeline between Nenana Canyon and Carlo Creek will require acres of borrow pits, location undetermined, along with trucks or other conveyances to move the gravel. The effects of these pits, transportation corridors and vehicles on habitat, water resources, soundscape and viewscape is likely to be significant and difficult to mitigate, and, again, local citizens will oppose all access roads. We ask that, pre-EIS, locals have opportunities to provide comments on plans for this area, as they are developed.

4. The pipeline route through the **Carlo Creek area**, south of the Yanert Valley, will impact a growing residential and tourism-oriented community. Between that area and Cantwell, there are a number of rural residences and small businesses that rely on the wild and untrammeled nature of the area. Scenic and infrastructure impacts of the LNG pipeline to these regions will be, as above, difficult to mitigate. Private property conflicts are likely in a few places.

5. No information has been given to the Denali Borough community on how a buried gas pipeline will be safe and relatively maintenance-free when buried in discontinuous permafrost and water-saturated soils.
   a. The EIS should detail what the life span of this pipeline is expected to be, given environmental conditions and influences. When no longer in use, will the pipeline be pulled up?
   b. The EIS should detail how the pipe senses a breach and how quickly the flow of gas can be shut down. What relative dangers occur in pipelines buried close to roads and residences? What relative dangers occur if there is a breach below an above-ground wildfire?
   c. The EIS should detail the maintenance and monitoring activities that will be regularly required and how access will be accomplished for these activities.
   d. The EIS should stipulate how many access roads are needed permanently, and how many for construction purposes only.

6. Impacts experienced during construction of this project will be significant, and some will persist after construction is complete. Even before the Draft EIS is released, locals should have the opportunity to learn about and comment on site-specific infrastructure plans. We give a few examples below:
   a. Personnel camps, truck and storage pads, helipads and air access locations can have severe impacts to safety, traffic, emergency resources and quality of life, depending on how large they are and where sited. The community should have a pre-EIS comment opportunity on these.
   b. Compressor stations and other project infrastructure, especially if near residences, can impact quality of life through effects on soundscape, nighttime lighting and traffic concentration. We have been told that two compressor stations will be present in the borough. We ask that once their locations are identified, that locals have the opportunity to learn more about them and provide comment, ahead of any EIS.
   c. Gravel extraction pits can affect habitat, nearby residential quality of life, traffic, water resources and availability of gravel for other community projects. Extraction of gravel is likely to be one of this project's most important impacts, and will persist beyond the construction phase. Gravel extraction siting is an important component of borough planning, just now gaining momentum in the Denali Borough.
   d. Withdrawal of water from local streams to support personnel and construction needs could have large impacts, which currently are unknown.
   e. Impacts of the project on the already-congested Parks Highway in the Denali Borough (mentioned already as a special circumstance in the Nenana Canyon) are likely to be severe throughout the borough (and would be much less on the TAPS route). The EIS should consider this issue in detail.

7. Socio-economic impacts of this project may provide some benefit for local businesses and paychecks for local workers, but overall the benefits are not assured, long-term. The Draft EIS must be specific about how such impacts will be mitigated.
    a. The Denali Borough has a relatively small population, and a seasonal economy highly dependent on tourism, the school, national park and coal mine. Per capita income in 2013 was 33% above the statewide average. Local communities have stable to slightly declining populations since the last census. Likely, many construction workers would have to come from outside the borough, creating a potential drain on public services and safety.
    b. Infrastructure to provide support services during construction could industrialize parts of the community and lead to blight if not decommissioned or repurposed. The EIS should consider this socio-economic problem and its mitigation in detail.
    c. The needs of a large pipeline construction project in a borough that is only beginning to classify its lands and develop land use plans could derail appropriate classification of lands. The Alaska LNG Project crosses a number of parcels owned by the Denali Borough, including lands in the Panguingue Creek Area, Otto Lake Area, north Nenana Canyon, Montana Creek and McKinley Village. FERC should consider how relatively unprepared, from a land planning perspective, the borough is for a huge, complex industrial project.
    d. In addition, because there is insufficient market for take-off of gas to local homes and businesses, neither the borough government nor its citizens are likely to benefit from this project over the long term, but will be forced to experience the impacts. Whether the borough government could benefit from pipeline crossing its lands through some sort of tariff is unknown and not assured.

We ask FERC to consider the impacts of the Alaska LNG pipeline on the people and lands of the Denali Borough. We ask also that FERC consider whether a large pipeline project along the Parks Highway is in the best interests of Alaskans as a whole. The state of Alaska, a partner in the LNG project, has a vested interest in maintaining the scenic landscapes bordering Denali National Park. In 2014, more than half a million people visited Denali National Park, which generated more than a 7 million dollar benefit to the local economy. The unique challenges of valuable scenic landscapes, challenging topography, seismicity and complex transportation infrastructure make this route a poor choice for Alaska LNG. Our board and members do not oppose the concept of taking Alaska gas to tidewater for export, if economically and environmentally feasible. We simply think Alaska LNG should use another route.

Sincerely,

/s/ Nancy Bale

DCC Board of Directors
David Arnold
Nancy Bale
Nan Eagleson
Brian Napier
Hannah Ragland
Michael Raffaeli
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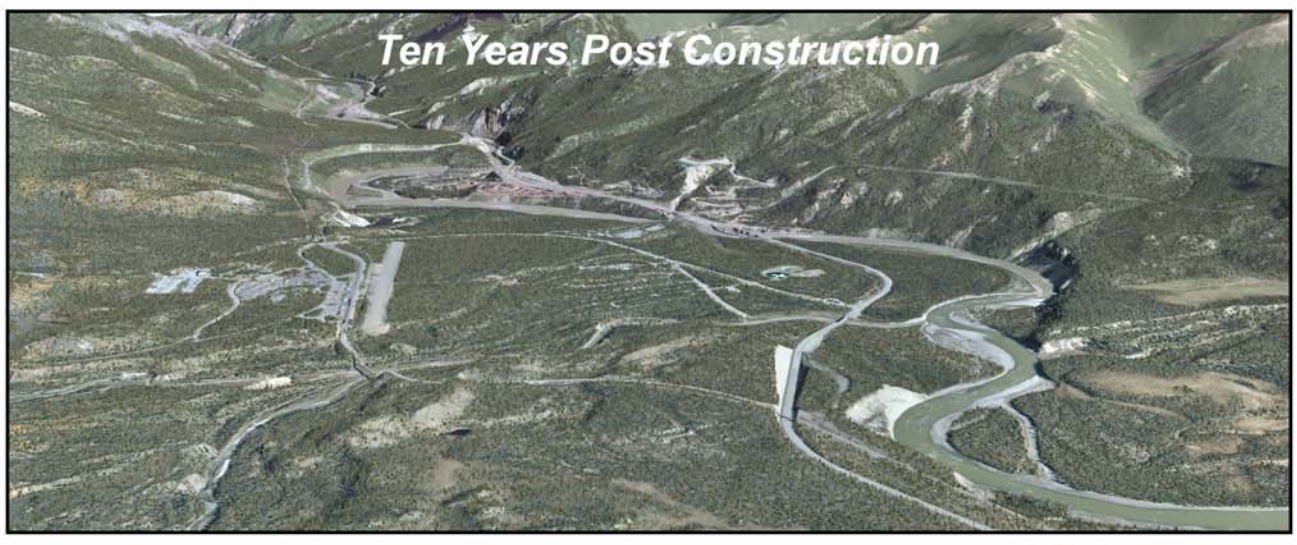
Attachments (2 pp.): Enstar views of pipeline cut

ENSTAR Pipeline Visual Impact Analysis for the Denali View Alternative



ENSTAR
Natural Gas Company

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