

CM7 – Comment Meeting Written Comments

20191017-3060 FERC PDF (Unofficial) 10/17/2019

Note to: FERC Docket No. CP17-178-000
From: John Peconom, Deputy Project Manager
Date: October 17, 2019
Subject: Alaska LNG Project – Comments Received on the Draft
Environmental Impact Statement

FERC environmental staff hosted eight Public Comment meetings on the draft environmental impact statement for the proposed Alaska LNG Project during the week of September 9, 2019. At these meetings, staff received the enclosed written comments. These comments will be considered along with other comments received during the preparation of the final environmental impact statement.

CC-161

CM7 – Comment Meeting Written Comments (cont'd)

**FEDERAL ENERGY REGULATORY COMMISSION
ALASKA LNG PROJECT (DOCKET NO. CP17-178-000)**

Comments can be: (1) left with a FERC representative; (2) mailed to the addresses below or (3) electronically filed¹.

Please send one copy referenced to Docket No. CP17-178-000 to the address below.

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

Denali Mtg
9/11/19
JU

COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

The EIS discusses recreational impacts only in terms of temporary, construction-related impacts. In reality, this project would permanently alter and degrade recreational opportunities in the Denali area. Because the economy of this area is so recreation-dependent, these long-term/permanent impacts to recreation and the recreation economy should be mentioned and analyzed in the recreation and socio-economic sections of the EIS. This is of primary importance to the Denali area.

CM7-1

CM7-1

Section 4.9.4 of the final EIS addresses both construction and operational impacts on recreation, including longer-term impacts, where applicable.

Commentor's Name and Mailing Address (Please Print)

Jennifer Johnston
PO Box 161
Denali Park, AK 99755

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(a)(1)(iii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Sign up" or "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." All comments submitted under eFiling are placed in the public record for the specified docket or project number(s).

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CM7 – Comment Meeting Written Comments (cont'd)

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COMMENTS: (PLEASE PRINT) [continue on back of page if necessary]

I would like to see an actual cost benefit analysis as part of the EIS. There has not been evidence presented for how the restricted ~~access~~ access to recreation, impacts to usual stunning landscapes the Alaska tourism industry relies on will or will not be less economically beneficial for the state and for local jobs than the Alaska LNG pipeline. ~~State~~ ~~State~~ ~~State~~

CM7-2

CM7-2

A cost benefit analysis is not required to inform the impact significance determinations of the EIS.

Commentor's Name and Mailing Address (Please Print)

Rose Keller
PO Box 128
Denali Park Alaska 99755

¹ The Commission encourages electronic filing of comments. See 18 Code of Federal Regulations 385.2001(c)(1)(ii) and the instructions on the Commission's Internet website at <http://www.ferc.gov> under the link to "Documents and Filings" and "eFiling." eFiling is a file attachment process and requires that you prepare your submission in the same manner as you would if filing on paper, and save it to a file on your hard drive. New eFiling users must first create an account by clicking on "Sign up" or "eRegister." You will be asked to select the type of filing you are making. This filing is considered a "Comment on Filing." All comments submitted under eFiling are placed in the public record for the specified docket or project number(s).

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CM7 – Comment Meeting Written Comments (cont'd)

September 9, 2019

**Boulder Point Neighborhood Response to the DRAFT
Environmental Impact Statement**

Dear Federal Energy Regulatory Commission,

We appreciate the effort that you have put into the DRAFT Environmental Impact Statement published in June, 2019 for Docket No. CP17-178-000. In response to your invitation for Public Comment, in the effort to refine the Environmental Impact Statement, we offer 15 specific comments. The screenshots of the pages from the DRAFT Environmental Impact Statement are shown, with the specific comments.

Paramount is our concern is that for many reasons – each carefully specified in this letter – the West Alternative is the best routing for the Mainline to cross the Cook Inlet. There is upside to using the West Alternative – upside for the project avoiding miles of sand waves which could undermine the line, leading to vortex oscillation and pipeline overstress and rupture, upside for the habitat for many species, upside for the Moose Calving concentration that has yet to be recognized in the Environmental Impact Statement, upside for the pristine forests that you so well define in your DRAFT Environmental Impact Statement, and upside for the families that live on Boulder Point. There is no downside – the pipeline in the West Alternative will come ashore into a Kenai Peninsula Borough parcel that it is proposed to bisect in the original proposed routing.

The first Scoping Meeting of the Federal Energy Regulatory Commission in Nikiski was held October 27, 2015. Neighbor Pete McKay asked many technical questions about the project, some of which have not yet been answered. Four Cook Inlet crossing routes were being considered by AKLNG. In April, 2017, the fifth Revision C2 route bisecting Boulder Point was submitted to FERC by the project. Word circulated of AGDC's proposal to route the pipeline through our neighborhood. The First meeting expressing the concerns of Boulder Point neighborhood were at the AGDC offices in Anchorage in January, 2018. The Boulder Point neighborhood sent letters to FERC dated September 10th, 2018 and December 3rd, 2018 recommending a Nikiski Bay, underwater routing to avoid significant disturbances upon over 5 miles of natural land. The DRAFT Environmental Impact Statement now details and considers the commendable new sixth route, the "West Alternative".

We are providing this content for consideration to the DRAFT Environmental Impact Statement before the deadline of October 3rd, 2019.

Thank you,

Neighborhood of Boulder Point

CM7-3

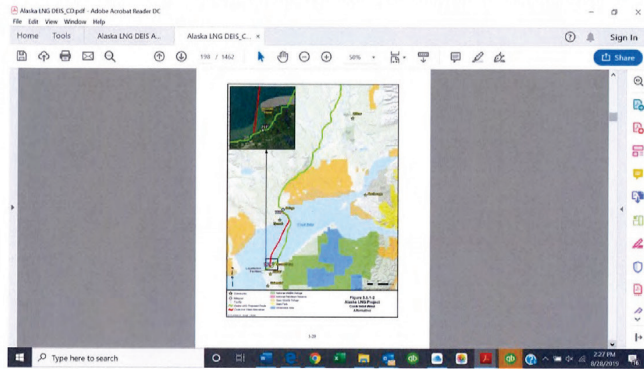
CM7-3

See the updates to section 3.6.1.2 of the final EIS regarding the Cook Inlet West Alternative.

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CM7 – Comment Meeting Written Comments (cont'd)

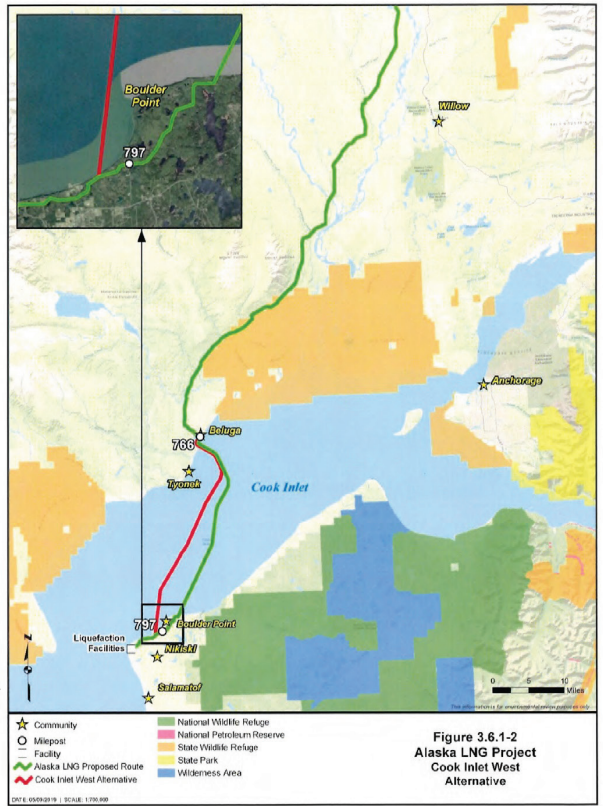
The West Alternative is shown here, from page 198 of the DRAFT Environmental Impact Statement: | CM7-3



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CM7 – Comment Meeting Written Comments (cont'd)

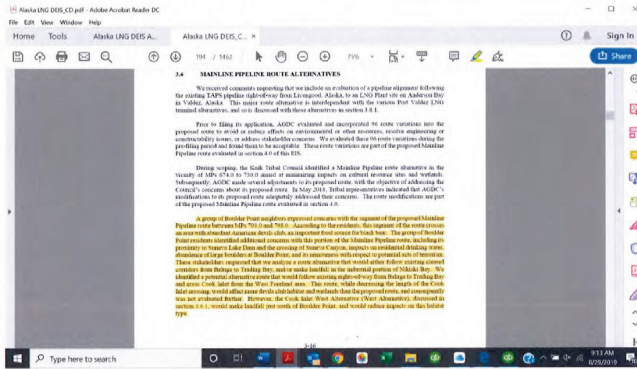
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CM7 – Comment Meeting Written Comments (cont'd)

- 1. Habitat: This land contains the habitat that will avoid becoming industrialized with the West Alternate revised routing across the Cook Inlet, which was well-captured by the paragraph in section 3.6 of the DRAFT Environmental Impact Statement. "The West Alternative...would reduce impacts on this habitat type."

CM7-3



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CM7 – Comment Meeting Written Comments (cont'd)

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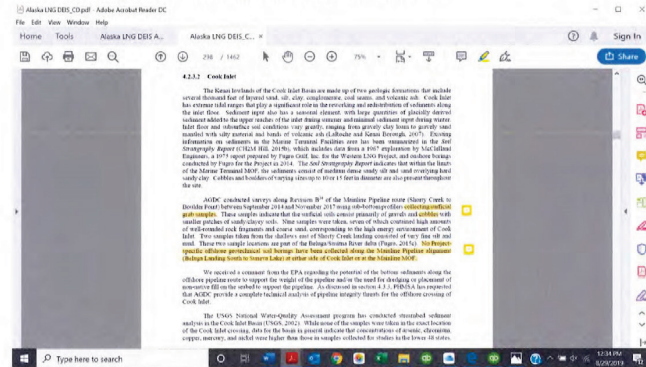


CM7 – Comment Meeting Written Comments (cont'd)

2. AGDC's assertion (below) that trenchless boring could be completed at Boulder Point is unsubstantiated. Is it pure speculation that the pipeline could be laid through the known, visible boulder field off of Boulder Point. Excavation on Boulder Point near existing exposed rock usually leads to even greater numbers of similar sized buried rock.

From DRAFT Environmental Impact Statement 4.2.3.2 Cook Inlet: "No Project-specific offshore geotechnical soil borings have been collected along the Mainline Pipeline alignment (Beluga Landing South to Suneva Lake (Boulder Point)) at either side of Cook Inlet or at the Mainline MOF." No borings or seismic data have been collected to determine what lies below the bottom off of Boulder Point. 1.

This quote is from the DRAFT Environmental Impact Statement below:



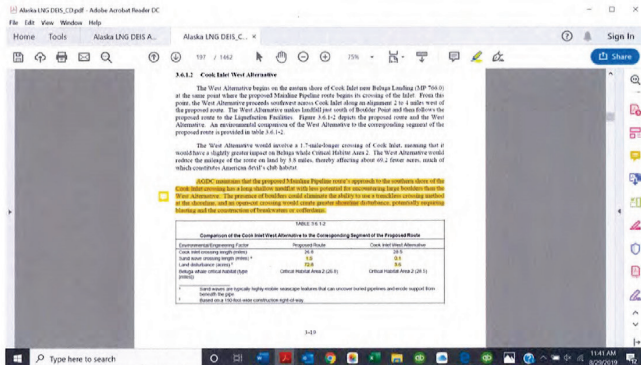
CM7-4

CM7-4

See the updates to section 3.6.1.2 of the final EIS regarding the Cook Inlet West Alternative.

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CM7 – Comment Meeting Written Comments (cont'd)



AGDC has made no borings nor performed seismic field work to ascertain the rock below the sea floor on the nearshore crossing, where the proposed pipeline will be subsurface.

CM7-4

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CM7 – Comment Meeting Written Comments (cont'd)



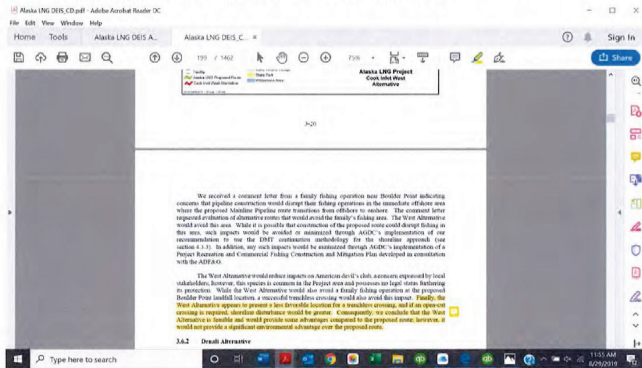
Seen here at fairly low tide, numerous boulders are visible where AGDC proposes to place the pipeline. The West Alternative is superior location to avoid these boulders, and those entrained in the gravel and mud beneath the seafloor. | CM7-4

CC-171

CM7 – Comment Meeting Written Comments (cont'd)

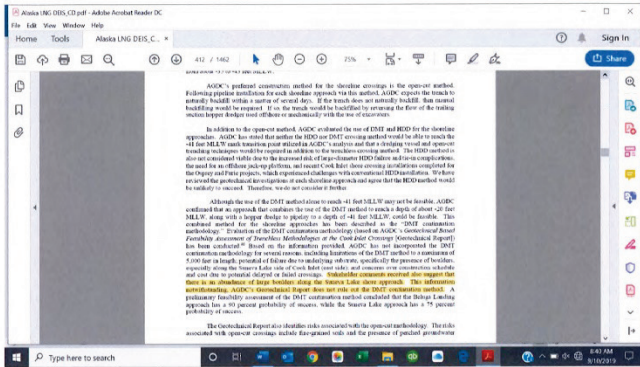
3. Ability to use Trenchless Boring (DMT, or Directional Micro-Tunnelling): Contrary to the DRAFT conclusion in the DRAFT Environmental Impact Statement, with much smaller rock, sands and mud, the West Alternative in appears to present a more favorable location for trenchless and crossing, in Nikiski Bay with finer rock. The Boulder Point coastline has far more rock and boulder within it. Trenchless crossing is not compatible through car- and house-sized boulders. AGDC has not performed borings below the bottom of the Cook Inlet to ascertain that the route that remains out-of-sight is clear of boulders. On Boulder Point, excavation near boulders usually uncovers many more buried boulders, usually 5 to 10 times the number visible lying in close proximity. Shoreline disturbance would be less in Nikiski Bay if an open-cut was required, with fewer seen and unseen boulders to contend with. In Nikiski Bay, close by the West Alternative route, the track record shows that pipelines have been installed successfully with both trench and trenchless methods, and are in operation today.

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CM7 – Comment Meeting Written Comments (cont'd)



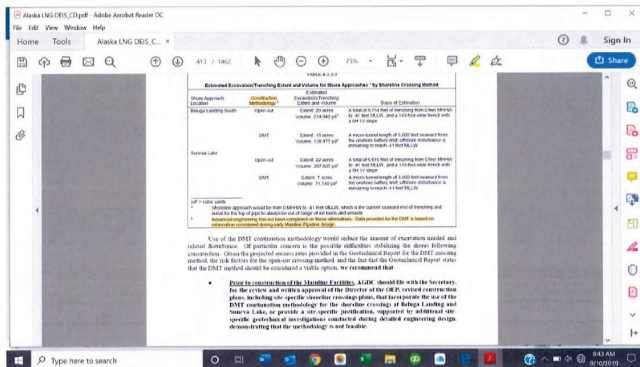
Here are some of the boulders pointed out by the Stakeholders on the proposed route:



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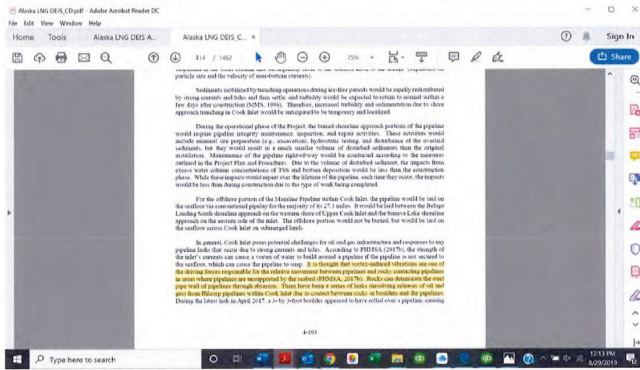


Advanced Engineering, necessary for a successful project, has not been completed.

CM7 – Comment Meeting Written Comments (cont'd)

4. Sand Waves: The DRAFT Environmental Impact Statement shows that the West Alternative will eliminate a pipeline run through sand waves on the bottom of the Cook Inlet, (0.1 miles of Sand Waves instead of 2.5 miles of Sand Waves). Mitigating the Sand Wave cause of risk of future pipeline breakage seems to be a home run for the West Alternative Routing alone. Below is language from the DRAFT Environmental Impact Statement pertaining to vortex-induced vibrations from currents where the pipeline is unsupported about the seabed floor. The dynamics of the pipeline resting among moving Sand Waves could cause unknown, long lengths of the pipe to bridge over valleys from Sand Wave to Sand Wave, exposing the full diameter of the pipe to the currents.

CM7-5



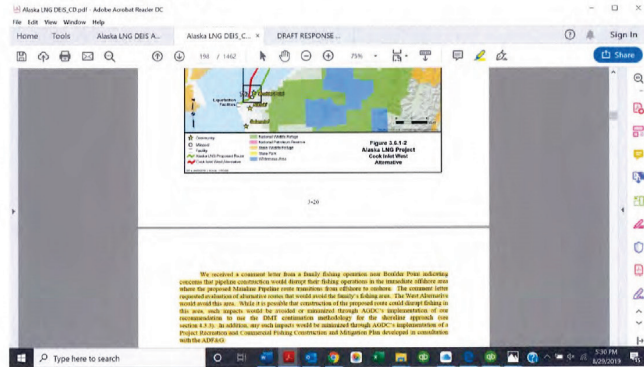
CM7-5

See the updates to section 3.6.1.2 of the final EIS regarding the Cook Inlet West Alternative. Safe operation of the pipeline falls under the jurisdiction of PHMSA. See the updated discussion in section 2.2.2.2 of the final EIS regarding the status of PHMSA's review of the offshore pipeline.

CM7 – Comment Meeting Written Comments (cont'd)

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5. Established Fishing Operations:



Byron and Maria Nalos, parents of 3 young children, along with 2 other Boulder Point fishing families fishing on long-held fishing sites, have justifiable concerns that their fishing sites will be affected. As previously noted herein, DMT (directional micro-tunneling) methodology has not been proven to be likely success along the Proposed routing due to Boulders. However DMT technology has been utilized previously in Nikiski Bay, and DMT methodology as suggested in the DRAFT EIS of up to 5,000 feet there will be far beyond nets set at the shoreline. Therefore, the Nalos family will be able to continue their family fishing operation unhindered and uninterrupted with the West Alternative Pipeline routing.

CM7-6

CM7-6

See the updates to section 3.6.1.2 of the final EIS regarding the Cook Inlet West Alternative.

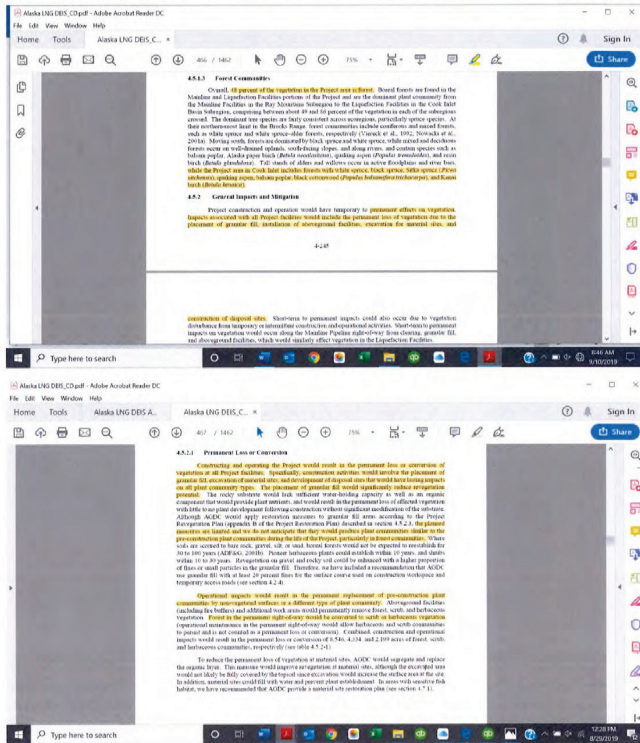
CM7 – Comment Meeting Written Comments (cont'd)

6. 4.5.1.3 Loss of Forest. Loss of Forest is qualified by FERC in the Draft EIS as "Significant". The West Alternative will eliminate 69.2 acres of a 150 foot+ wide clearing of Forest destruction (a mere 3.6 acres for the West Alternative instead 72.8 acres for the proposed route), saving a lineal bisect of thousands of acres of pristine habitat.

CM7-7

CM7-7

Comment noted.



CM7 – Comment Meeting Written Comments (cont'd)

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TABLE 4.1.2.1
Vegetation Affected by Project Construction and Operation (cont'd)

Facility	Preconstruction			Construction			Operation		
	Loss	Gain	Net	Loss	Gain	Net	Loss	Gain	Net
Gas Treatment Facilities									
Split	0	0	0	0	0	0	254	254	254
Substation*	0	0	0	0	0	0	207	207	207
OSP Substation	0	0	0	0	0	0	469	469	469
SPS Facility	0	0	0	0	0	0	0	0	0
PTTS Pipeline	0	0	0	32	7	25	1,493	339	1,157
Aluminum Facilities**	0	0	0	-11	-1	-12	-11	-1	-12
Additional water pump**	0	0	0	11	0	11	0	0	11
MPG and PWS Substation	0	0	0	33	7	26	1,493	199	1,692
Gas Treatment Facilities									
Subtotal	0	0	0	33	7	26	3,338	1,657	1,714
Marine Facilities									
Terminal operations**	5,200	8,203	3,003	4,715	1,569	3,146	3,376	551	1,825
Management facilities**	111	111	0	152	137	15	22	22	265
Administrative area**	6,106	786	4,320	3,206	238	2,968	160	23	1,662
Marine Facilities Subtotal	11,417	9,100	2,317	8,083	2,944	5,139	3,558	2,806	3,542
Operational Facilities									
EMP/DOC	372	372	0	26	26	0	16	16	364
Alone Terminal*	0	0	0	11	0	11	0	0	11
Construction camp	673	0	673	0	11	662	0	0	662
Logistics Facility	668	373	1,041	39	74	35	18	18	744
Operational Facilities Subtotal	1,713	745	968	76	111	657	34	34	1,445
Total	18,134	2,279	15,855	8,121	2,219	5,902	6,914	2,114	7,411

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The effect of the proportionally small losses of vegetation compared to the overall vegetation in the area is a net gain. The net gain is due to the higher gain from the construction of the facilities compared to the losses of vegetation. The net gain is due to the higher gain from the construction of the facilities compared to the losses of vegetation. The net gain is due to the higher gain from the construction of the facilities compared to the losses of vegetation.

4.5.2.2. **Disturbance**

Vegetation damage could occur both on and adjacent to construction areas. When vegetation is removed, it is replaced by bare soil or gravel. This loss of vegetation is temporary, and the vegetation will regrow over time. The loss of vegetation is temporary, and the vegetation will regrow over time. The loss of vegetation is temporary, and the vegetation will regrow over time.

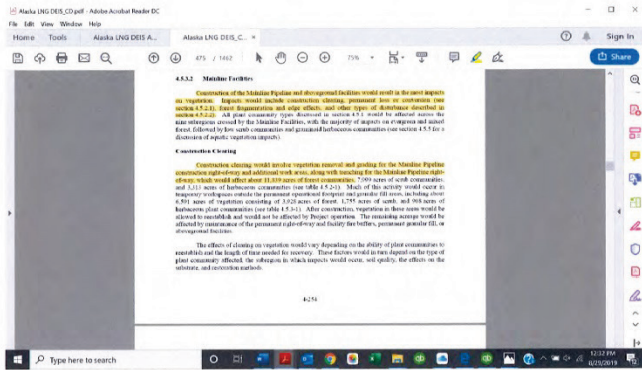
Disturbance to vegetation could occur both on and adjacent to construction areas. When vegetation is removed, it is replaced by bare soil or gravel. This loss of vegetation is temporary, and the vegetation will regrow over time. The loss of vegetation is temporary, and the vegetation will regrow over time. The loss of vegetation is temporary, and the vegetation will regrow over time.

DRAFT Environmental Impact Statement, page 470, highlighted above:

"Impacts on forest communities would be significant given the quantity of additional forest vegetation that would be removed through construction clearing for the Mainline Facilities"

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CM7 – Comment Meeting Written Comments (cont'd)

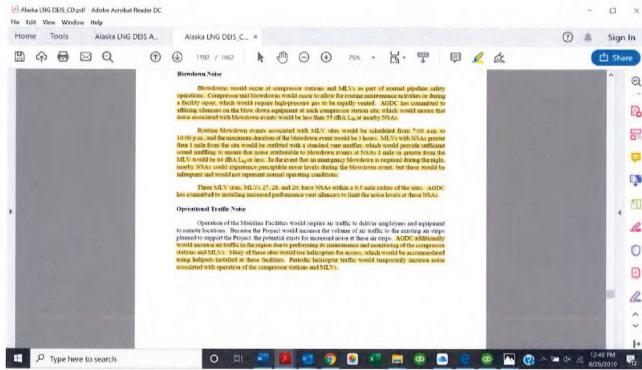


CC-179

CM7 – Comment Meeting Written Comments (cont'd)

7. 4.16.4.2 Noise during operation. There is a MLV (Main Line Block Valve), with attendant helipad, proposed to be located within the neighborhood of Boulder Point. Blowdown Noise and Helicopter Noise will be eliminated by relocating the pipeline to Nikiski Bay, the West Alternative.

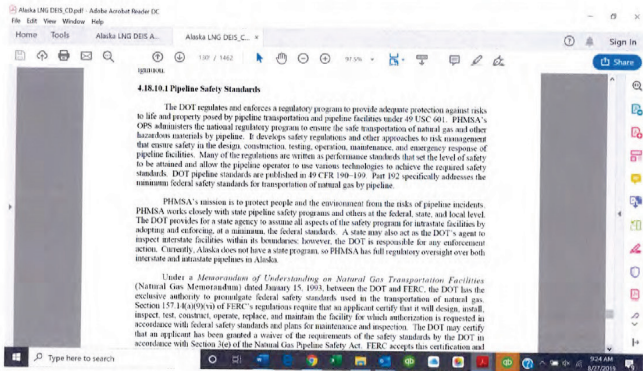
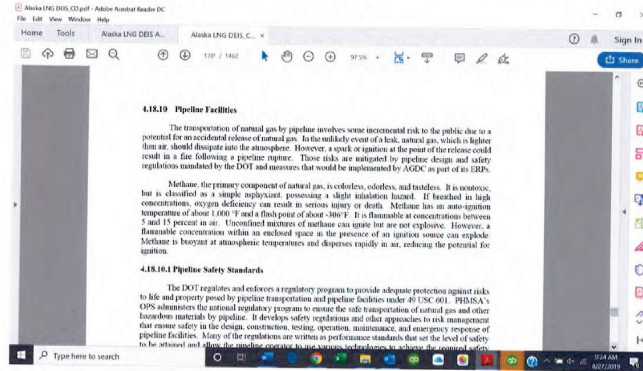
CM7-7



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CM7 – Comment Meeting Written Comments (cont'd)

8. 4.18.10.1 Pipeline Safety – Zero risk will be imposed on the Boulder Point residential area if the pipeline follows the West Alternate. Commensurately, there 100% exposure to actual pipeline risks if located in the Boulder Point residential area. CM7-7



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CM7 – Comment Meeting Written Comments (cont'd)

4.18.10.2 Pipeline Safety Program

In accordance with DOT regulations, the Mainline Pipeline, PTL, and PBTLL would be subject to a prescribed safety program. The practices would be regularly inspected for leakage and potential pipeline hazards such as construction activity, encroachments, and evidence of recent unannounced excavations. During scheduled operation and maintenance, the following inspections would occur:

- physically walking and inspecting the pipeline corridor periodically;
- conducting fly-over inspections of the right-of-way as needed;
- inspecting and maintaining aboveground facilities; and
- conducting leak surveys using external gas detection equipment at least once every calendar year or as required by regulations.

The DOT requires pipeline operators to place pipeline markers at frequent intervals along the pipeline right-of-way, such as where a pipeline intersects a street, highway, railway, or waterway, and at other prominent points along the route. Pipeline right-of-way markers can help prevent encroachment and excavation-related damage to pipelines. Pipeline markers (identifying the owner of the pipeline and a 24-hour telephone number) would be placed for "line of sight" visibility along the entire pipeline length, except in active agricultural crop locations and in waterbodies in accordance with the DOT's requirements. Alaskan state law requires excavators to call the one call "Dig Line" in advance of digging to locate underground utilities.

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 operations and maintenance office in Alaska.

1	76.0	76.0	Sagwon Compressor Station	RCV
2	112.0	36.1	Stan-alone ILV	ASV
3	146.5	36.5	Sabal Trail Compressor Station	RCV
4	194.1	46.6	Stan-alone ILV	ASV
5	246.1	46.2	Control Compressor Station	RCV
6	286.1	46.0	Stan-alone ILV	ASV
7	332.8	46.8	Ray River Compressor Station	RCV
8A	356.2	23.6	Address for potential Hazmat Calls HCA	ASV
9	378.2	21.7	Stan-alone ILV	ASV
10	421.6	43.6	Minto Compressor Station	RCV
11	444.9	23.3	Stan-alone ILV	ASV
12	467.1	22.2	Stan-alone ILV	ASV
13	493.8	23.9	Stan-alone ILV	ASV
14	517.4	24.7	Wally Compressor Station	RCV
15	538.8	17.2	Upstream of Class 3 Location - Henana Canyon	ASV
16	538.8	4.5	Downstream of Class 3 Location - Henana Canyon	ASV
17	546.5	7.7	Stan-alone ILV	ASV
18	572.2	25.7	Stan-alone ILV	ASV
19	597.4	25.1	Honolulu Creek Compressor Station	RCV
20	625.8	28.8	Stan-alone ILV	ASV
21	648.2	22.3	Stan-alone ILV	ASV
22	676.2	27.1	Rathbone Creek Compressor Station	RCV
23	703.7	28.4	Stan-alone ILV	ASV
24	728.9	22.3	Stan-alone ILV	ASV
25	748.1	23.2	Thorsone River Meter Station	RCV
26	756.0	16.8	Upstream of DGM Inlet crossing	ASV
27	763.3	27.3	Downstream of DGM Inlet crossing	RCV
28	789.9	9.5	Stan-alone ILV	ASV
29	826.9	6.7	LNG Meter Station	RCV

RCV = remote controlled valves; ASV = automatic shut-off valves

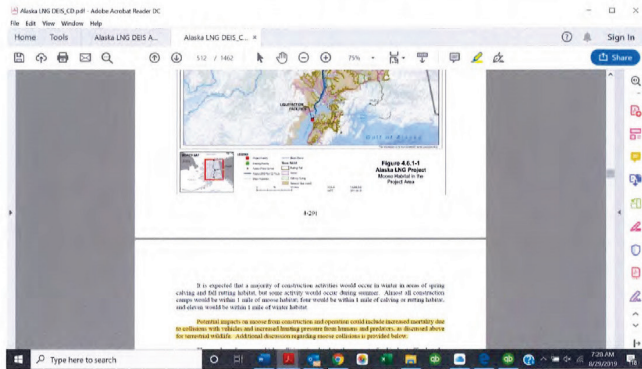
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CM7 – Comment Meeting Written Comments (cont'd)

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CM7 – Comment Meeting Written Comments (cont'd)



From the Draft EIS: "Moose could be distracted from their normal migration patterns if they encounter new vegetative growth within the right-of-way. The impacts of the potential occurrence of additional moose in the Project area include disruptions to their migration patterns, making them more accessible to hunting and altering their use of habitat because they could be attracted to the forage available in the right-of-way. These impacts would persist for the life of the Project."

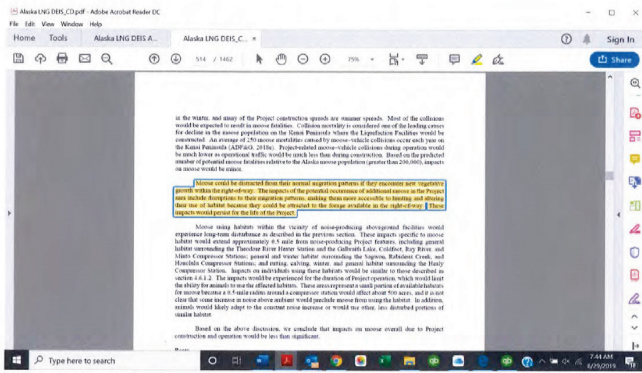
Avoidance of the Milemarkers 793-798 through this prime Moose Calving Concentration area is critical.

CM7-8

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CM7 – Comment Meeting Written Comments (cont'd)

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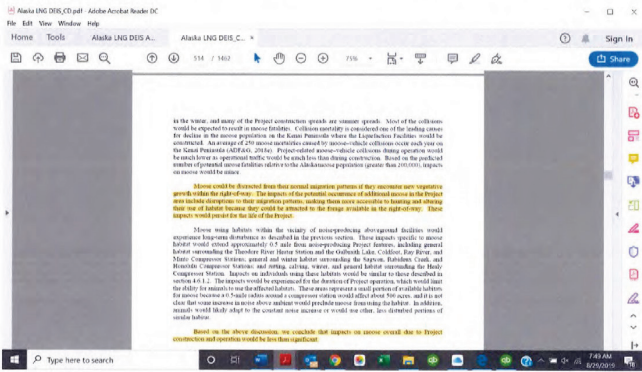


It is entirely questionable how the impacts on Moose can be considered "less than significant" in the DRAFT Environmental Impact Study. The knowledge of the Concentrated Moose Calving area on Boulder Point should be recognized in the Final EIS, and accommodations made to avoid this area. The West Alternate pipeline routing accomplishes this accommodation for protection of the Concentrated Moose Calving area.

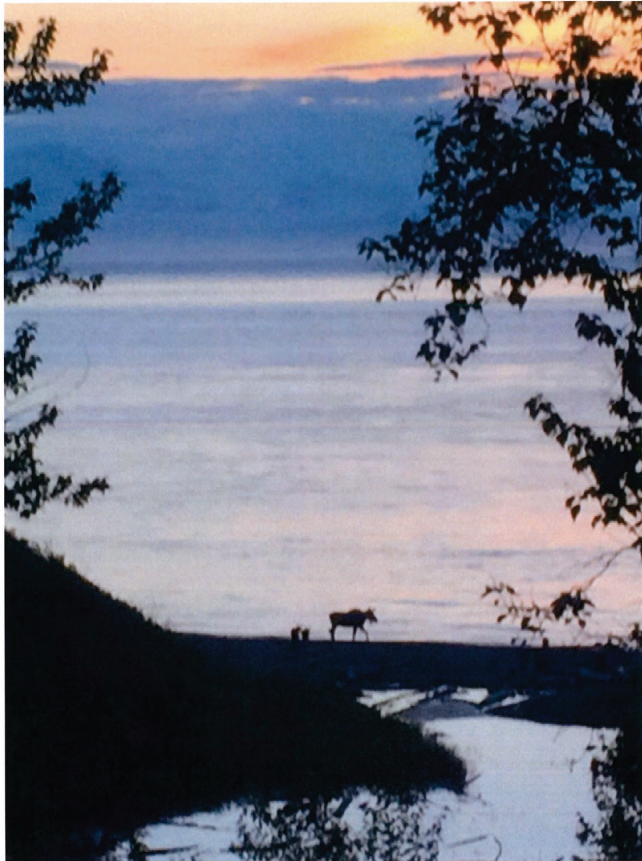
CM7-9

CM7-9

See the response to comment CM7-8.



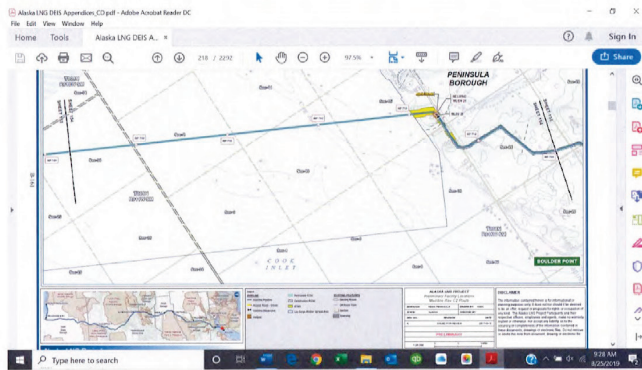
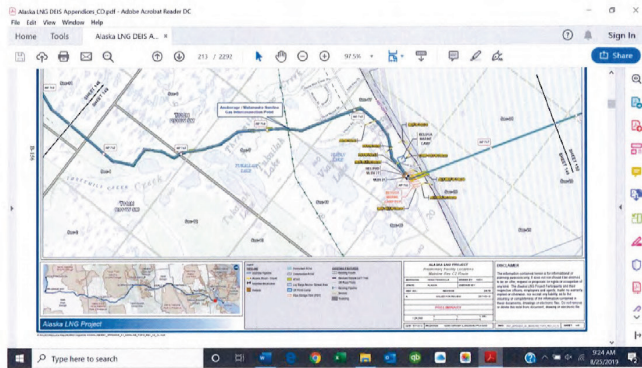
CM7 – Comment Meeting Written Comments (cont'd)



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CM7 – Comment Meeting Written Comments (cont'd)

CC-189



CM7 – Comment Meeting Written Comments (cont'd)

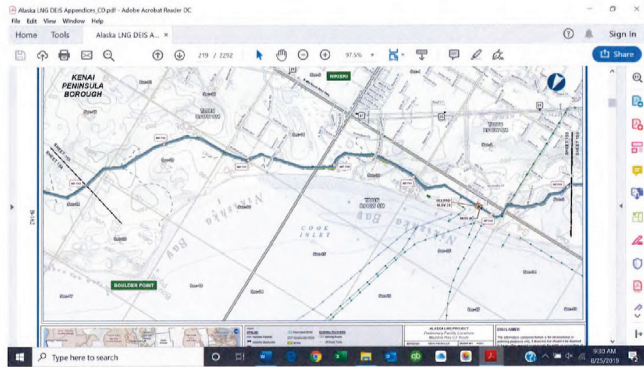


TABLE C-16 (cont'd)

Marina Facilities Gravel Access Roads

Feature Name	Milepost	Road Type	Signal	Status	On Centerline	Road Length (ft)
JR-16793.29	756.1	Temporary	Gravel	New	Yes	4,122.2
IS-16793.13	760.0	Temporary	Gravel	New	Yes	100.1
JR-16793.43	763.3	Temporary	Gravel	New	Yes	668.1
MOF-16793.34	765.6	Temporary	Gravel	New	No	632.3
PZ-16793.8	765.6	Temporary	Gravel	New	Yes	808.3
PZ-16793.13	765.8	Temporary	Gravel	New	Yes	281.3
CAIR-16793.22	765.9	Temporary	Gravel	New	No	504.5
MOF-16793.34	766.0	Temporary	Gravel	New	No	31.6
MOF-16793.36	766.1	Temporary	Gravel	New	No	33.2
AL-16793.34	766.2	Temporary	Gravel	New	Yes	977.4
AL-16793.36	766.2	Temporary	Gravel	New	No	693.8
JR-16793.44	793.3	Temporary	Gravel	New	Yes	154.0
JR-16793.44-804.06	803.4	Temporary	Gravel	New	No	218.7
LINK						
Linkup	806.6	Permanent	LINK-16	New	No	LINK-16

MM 793.2 156 feet of road

CC-190

CM7 – Comment Meeting Written Comments (cont'd)

CC-191

628.2	628.7	0.5	50-100 feet	GGI Fiber Cable
628.6	630.1	0.5	50-100 feet	Parks Highway
628.9	636.5	0.6	50-100 feet	Parks Highway
636.9	637.7	0.8	50-100 feet	Parks Highway
648.6	650.4	1.0	50-100 feet	Parks Highway
650.2	650.4	0.6	50-100 feet	GGI Fiber Cable
650.8	651.2	0.4	50-100 feet	Parks Highway
650.3	656.6	0.3	50-100 feet	Parks Highway
670.6	670.8	0.2	50-100 feet	Parks Highway
Kenai Peninsula Borough				
745.7	746.6	0.3	50-100 feet	Belega Hwy- Grant St
793.3	793.5	0.2	50-100 feet	Sockeye Ave
798.6	802.3	0.8	50-100 feet	Rockyfield Ave 100 Rd Line Df
803.4	804.4	1.2	50-100 feet	Healing Dr- S-400 Kenai Spur Hwy
805.3	806.6	0.7	50-100 feet	Barnice Lake Rd

Length is based on the Mainline Pipeline centerline and may not exactly match established midpoint numbers. The alignment reference for these collection points may be greater than 500 feet due to changes in elevation and adoption of route alternatives and variants. The requests should be considered reference points only.

Offset from road Sockeye 50-100 feet for .2 miles 793.3-793.5. This is clear Industrial intrusion upon a residential road. CM7-10

CM7-10 Comment noted.

Kenai Peninsula Borough	768.9	8196	ATUG for topsoil storage	2.08
Kenai Peninsula Borough	764.0	9046	Pre-Asst Rev C Shady Creek to Boulder Point route ATUG	1.90
Kenai Peninsula Borough	764.2	4334	Pre-Asst Rev C Shady Creek to Boulder Point route ATUG	1.53
Kenai Peninsula Borough	764.2	9947	Pre-Asst Rev C Shady Creek to Boulder Point route ATUG	1.90
Kenai Peninsula Borough	793.2	4332	Pre-Asst Rev C Shady Creek to Boulder Point route ATUG	1.90
Kenai Peninsula Borough	793.2	4333	Pre-Asst Rev C Shady Creek to Boulder Point route ATUG	1.81
Kenai Peninsula Borough	793.4	8783	ATUG for topsoil storage	0.08
Kenai Peninsula Borough	793.4	2760	ATUG for stream coverage	0.08
Kenai Peninsula Borough	793.4	8783	ATUG for topsoil storage	0.04
Kenai Peninsula Borough	793.5	2781	ATUG for stream coverage	2.18
Kenai Peninsula Borough	793.5	8787	ATUG for topsoil storage	0.02
Kenai Peninsula Borough	793.6	2786	ATUG for stream coverage	0.06
Kenai Peninsula Borough	793.6	8786	ATUG for topsoil storage	0.12
Kenai Peninsula Borough	793.6	2779	ATUG for stream coverage	1.12
Kenai Peninsula Borough	793.7	8788	ATUG for topsoil storage	0.01
Kenai Peninsula Borough	793.8	8381	ATUG for bands	0.03
Kenai Peninsula Borough	793.8	8786	ATUG for topsoil storage	0.02
Kenai Peninsula Borough	793.8	8380	ATUG for bands	0.09
Kenai Peninsula Borough	793.8	8784	ATUG for topsoil storage	0.74
Kenai Peninsula Borough	793.8	8376	ATUG for bands	0.00
Kenai Peninsula Borough	793.8	8379	ATUG for bands	0.04
Kenai Peninsula Borough	793.8	8782	ATUG for topsoil storage	0.01

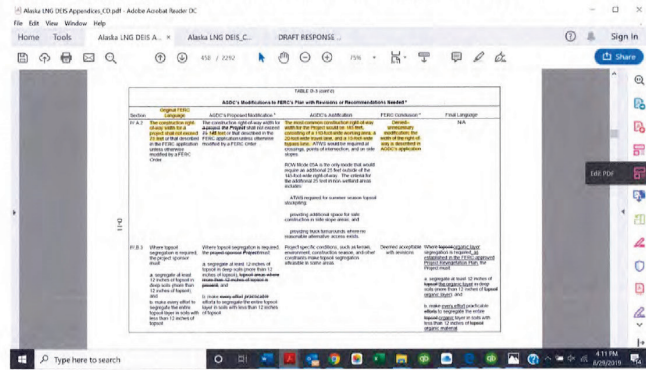
Above, at Boulder Point, in just 5 miles of proposed Mainline alignment, due to the steep slopes in rolling terrain, there are four pages compiling approximately 175 ATUGs (additional temporary work) CM7-11

CM7-11 Comment noted. Also, see the response to comment CM4-22.

CM7 – Comment Meeting Written Comments (cont'd)

spaces) to be used in addition to the AGDC requested 145 foot ROW. On top of that, FERC has denied the request for the 145 foot ROW – the width AGDC says it wants for the majority of the pipeline, and is holding the line on a 75 foot ROW. Clearly to get the pipeline through the tough, difficult terrain on Boulder Point, it will require a wide imposition on the natural forest landscape. This massive pipeline clearing and alignment – wider than any road or trail existing in Boulder Point today – can all be avoided by permitting the project through the West Alternate to Nikiski Bay. From the Appendices:

CM7-11



CM7 – Comment Meeting Written Comments (cont'd)

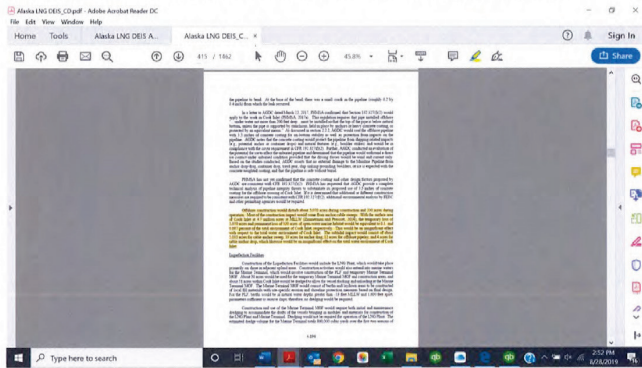
10. Marine Mammals:

"Loss of open-water marine habitat would be insignificant." An additional small area of the Cook Inlet for the additional 1.7 miles of pipeline for the West Alternate would also be insignificant. This will save the destructions caused by a 5 mile swath through raw, pristine forest habitat.

CM7-12

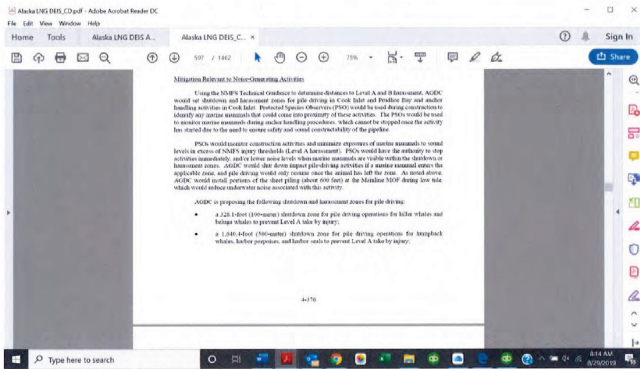
CM7-12

Comment noted.

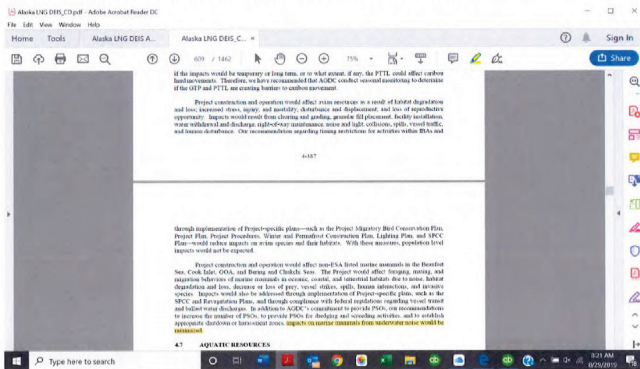


For the slight additional underwater length that the West Alternative Nikiski Bay Pipeline route would take, there are established mitigation measures to protect Marine Mammals, starting on page 597:

CM7 – Comment Meeting Written Comments (cont'd)



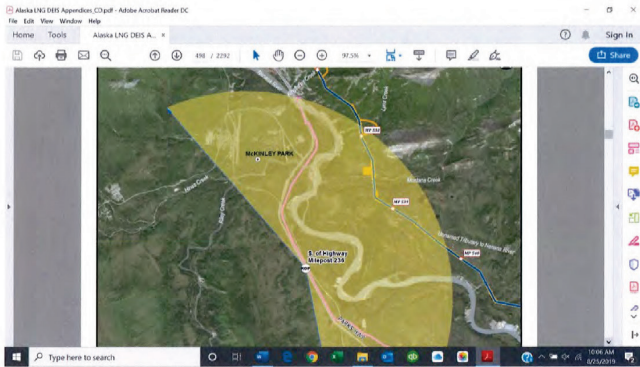
The final sentence related to Marine Mammals in the Draft Environmental Impact Statement states that: "...impacts on marine mammals from underwater noise would be minimized."



CC-194

CM7 – Comment Meeting Written Comments (cont'd)

11. Visual Impacts:



In McKinley Park - Denali National Park and Preserve – Visual Impacts are seriously considered. There are Visual Impacts to persons on the Kenai Peninsula as well, but without National Park Status these Visual Impacts have not been considered yet. Opening a 145 foot wide – some places wider, cleared, graded, Mainline Pipeline corridor through virgin tapestry of old terminal moraine and established natural habitat does create a Visual Impact to humans. With the option of placing the pipeline out of sight in the Cook Inlet for 2 additional miles to prevent over 5 miles of unsightly Visual Impact is also worthy.

CM7-13

CM7-13

Section 4.10.2 of the final EIS has been updated to address visual impacts on the Boulder Point neighborhood. Also, see the updates to section 3.6.1.2 of the final EIS regarding the Cook Inlet West Alternative.

CM7 – Comment Meeting Written Comments (cont'd)

3.A.1.2 Cook Inlet West Alternative

The West Alternative begins on the eastern shore of Cook Inlet near Beluga Landing (AP 766 (b)) at the same point where the proposed Mainline Pipeline route begins its crossing of the Inlet. From this point, the West Alternative proceeds southwest across Cook Inlet along an alignment 2 to 4 miles west of the proposed route. The West Alternative makes landfall just south of Boulder Point and then follows the proposed route to the Liquefaction Facilities. Figure 3.A.1.2 depicts the proposed route and the West Alternative. An environmental comparison of the West Alternative to the corresponding segment of the proposed route is provided in table 3.A.1.2.

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

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

Environmental/Engineering Factor	Proposed Route	Cook Inlet West Alternative
Cook Inlet crossing length (miles)	20.8	22.5
Land-use crossing length (miles)	1.5	0.1
Land disturbance (acres)	72.8	3.6
Beluga whale critical habitat (type (mi ²))	Critical Habitat Area 2 (25.8)	Critical Habitat Area 2 (28.5)

CC-197

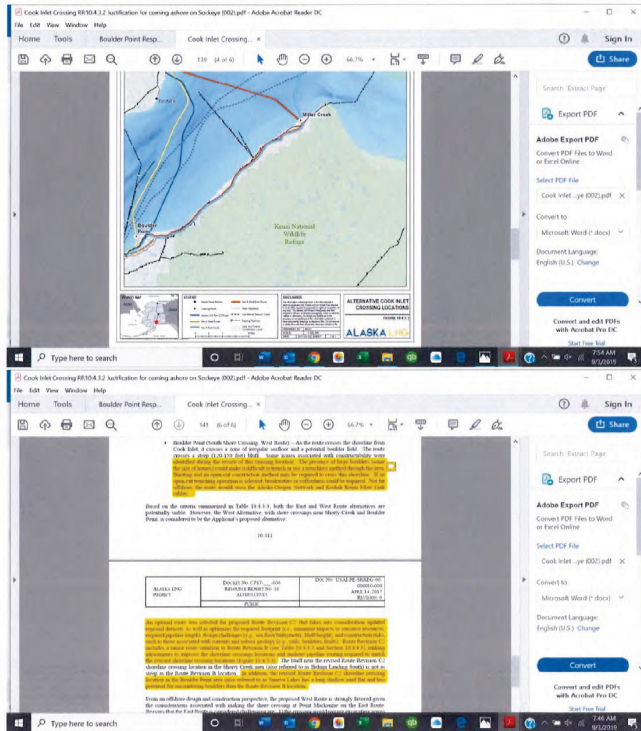
CM7 – Comment Meeting Written Comments (cont'd)

14. The DRAFT EIS "West Alternative" should not be confuse with former reports noting the "Route Revision B route", or the "South Shore Crossing, West Route". These are different routes entirely. This older route went through boulders to Boulder Point, and soil data there shows that is not viable.

CM7-16

CM7-16

Comment noted.



CM7 – Comment Meeting Written Comments (cont'd)

15. Existing Pipelines entering Nikiski Bay, shown at very low tide, and no boulders. Nearby is the West Alternative route. CM7-17



CM7-17 See the updates to section 3.6.1.2 of the final EIS regarding the Cook Inlet West Alternative.

CC-200

CM7 – Comment Meeting Written Comments (cont'd)



The West Alternate is the best routing for the Mainline, with the pipeline arriving ashore in Nikiski Bay, shown above.

CM7-17

Upsides to the West Alternate pipeline Location:

1. Habitat protection.
2. Solves unsubstantiated claims of knowledge of what lies below the bottom of the Cook Inlet by AGDC.
3. Solves incompatibility of trenchless tunneling and house-sized boulders
4. Avoidance of laying pipeline through, and potential pipeline rupture from future loss of support and protection from current in known Sand Waves
5. Avoidance of Impacts on Boulder Point Fishing Families
6. Preservation of Forests to which loss has already been deemed "Significant"
7. Noise Impacts avoided in Residential Area
8. Removes Pipeline Safety Risks from Residential Area
9. Avoidance of Moose Calving Concentration Area, avoidance of disturbance to Moose cover, and changes to Moose feeding grounds.
10. Marine Mammal impacts insignificant
11. Miles of Visual Impacts avoided

CM7 – Comment Meeting Written Comments (cont'd)

- 12. Avoidance of pipeline vulnerability from future Suneva Lake dam washout
- 13. Avoidance of Residential Areas, and keeps Mainline in Industrial areas as the DRAFT EIS states.
- 14. The West Alternative is an entirely new route, clear of boulders
- 15. The West Alternative arrives in a known location of multiple successful pipelines

CM7-17

FERC, for all of the reasons stated, please direct AGDC to route the Mainline along the West Alternate. The Boulder Point Neighborhood awaits confirmation that the West Alternative will be the permitted alignment in the FINAL Environmental Impact Statement.

Sincerely,


Neighborhood of Boulder Point

CM7 – Comment Meeting Written Comments (cont'd)


September 9, 2019


Signature Page, Boulder Point Response to FERC DRAFT Environmental Impact Statement


WILLIAM BECKETT


A.J. Ewing 

Debbie McKay
Debbie McKay



Robert J. Breeden

 Chris Morfou
SALVADORI NATIVE ASSOCIATION INC
President/CEO


Debbi Palm
Debbi Palm

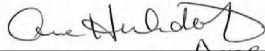
Gene Paton





H. Ross Njau, Jr.

Barbara Njau
Barbara Njau

 Byron Nelson
Byron Nelson


Anne Huldorf

CM7 – Comment Meeting Written Comments (cont'd)

Debbie McKay
252-8584 - cell
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46695 Joyce Circle
Kaneohe

CM7 – Comment Meeting Written Comments (cont'd)

Gene & Debbi Palm
55140 E Chinook Rd
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907-398-7601 / 907-398-7602
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September 11, 2019

Dear Federal Energy Regulatory Commission,

We, along with many other Nikiski residents, appreciate the work you folks have put into the DRAFT Environmental Impact Statement published in June, 2019. Our purpose with this letter is to note our support for the Boulder Point Neighborhood Response and urge you to recommend the West Alternative route for the LNG pipeline, instead of the route currently recommended which we believe would have an adverse impact on our neighborhood and our surroundings. Bob Breeden and some others have put in a lot of work detailing those concerns and are advocating for the West Alternative route which would allay almost all our concerns and which appears to be much more suitable and viable. Please give serious attention those comments.

CM7-18

CM7-18

See the updates to section 3.6.1.2 of the final EIS regarding the Cook Inlet West Alternative.

We'd also like to add some additional comments to point out other concerns. The current access to our neighborhood is Kishka Rd which (at MP 32, Spur Highway) runs about 1 ½ miles to our neighborhood on a narrow, for the most part, self-maintained substandard road. By any standard, it's a very narrow road, barely suitable for meeting traffic and closed in on both sides by brush and alder. It's not the best, but for the relatively minimal traffic generated by current neighborhood residents, works pretty well. The current recommended pipeline route would radically add traffic into our neighborhood, both from Kishka and via the access created by the on land pipeline corridor. Given what we've seen around Nikiski and other places, such additional access will readily be used by hosts of other folks using ATVs and 4-wheelers taking advantage of easier access to hunting and recreational areas. Aside from the impact that traffic could have on the environment and the increased vulnerability of moose, bear, etc., Kishka as is will not be able to accommodate the new traffic. Both safety and the quality of the road will likely be compromised. The added impact by the increased traffic on wildlife should be seriously considered and studied.

CM7-19

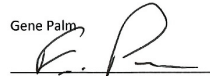
CM7-19

Section 4.12.2.1 of the final EIS has been updated to address this comment. Sections 4.6.1.2, 4.9.1.2, 4.11.7.3, and 4.14 of the final EIS discuss impacts from hunting due to the increased access to remote areas that would be provided by the Mainline Pipeline and access roads.

We also would like to add that both of us support the LNG project in general. It would be a "shot-in-the-arm" for the state economy, and could provide income and job opportunities for many residents, including ourselves.

Thanks again for your efforts and—hopefully—support,

Gene Palm

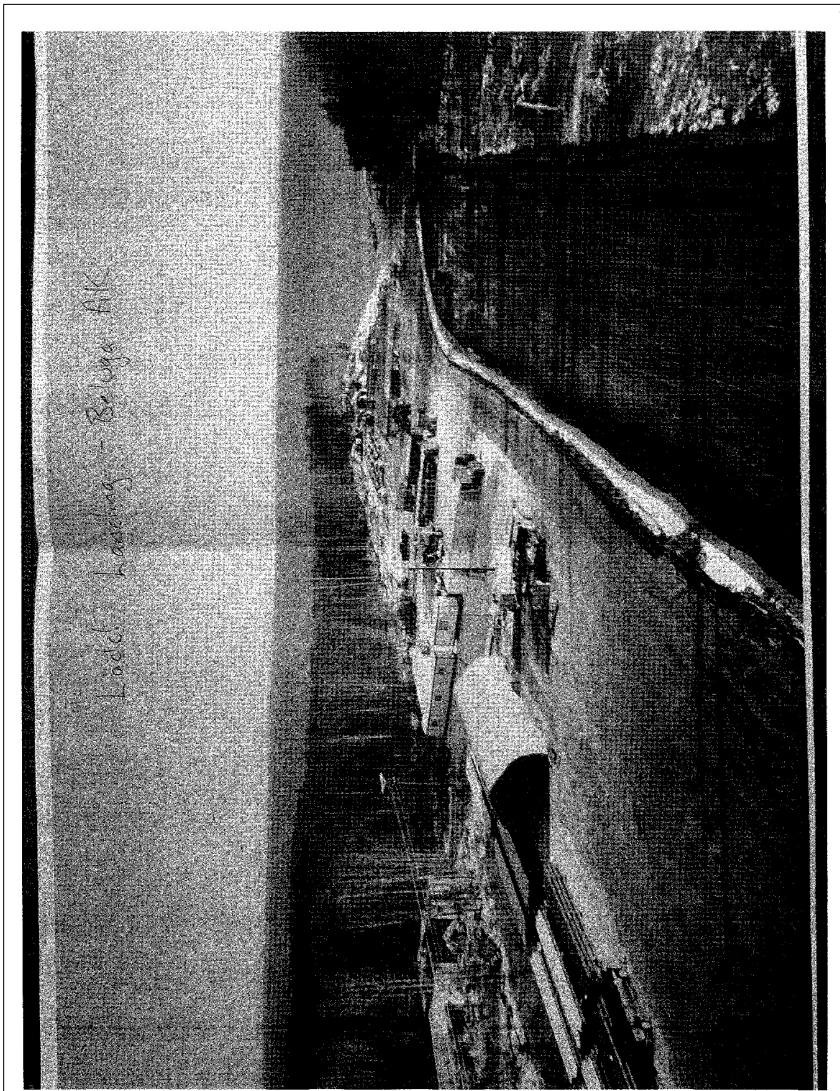


Debbi Palm



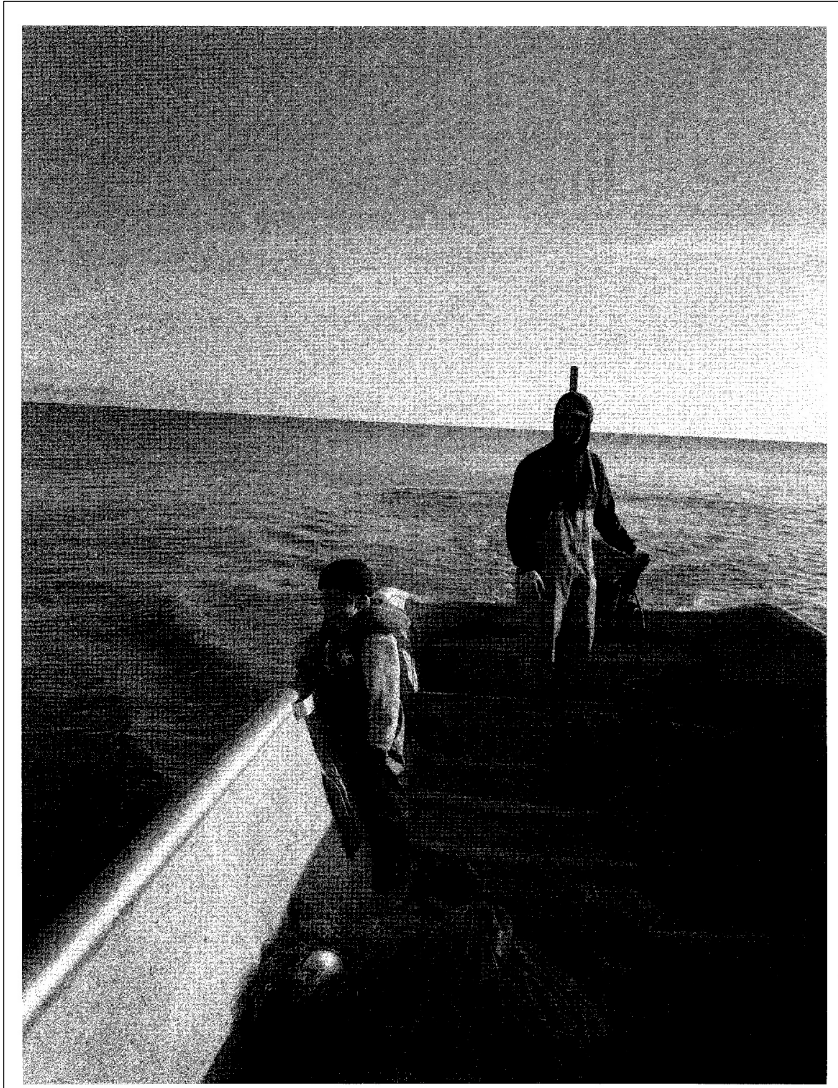
CM7 – Comment Meeting Written Comments (cont'd)

CC-206



CM7 – Comment Meeting Written Comments (cont'd)

CC-207



CM7 – Comment Meeting Written Comments (cont'd)

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Document Content(s)

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