

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, DC 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:  
TransCanada Alaska Company, LLC  
Alaska Pipeline Project  
Docket No. PF09-11-000

May 4, 2012

Ms. Irene T. Garcia  
EIS Project Manager  
Alaska Pipeline Project  
16945 Northchase Drive; Room 422  
Houston, TX 77060

**Re: Summary of Scoping Comments**

Dear Ms. Garcia:

The enclosure contains our summary of the comments received during the scoping period for TransCanada Alaska Company, LLC's (TC Alaska) Alaska Pipeline Project.

You will note that the summary is presented in tabular form for use when TC Alaska files its revised draft environmental resource reports. Please identify in the far right column where each scoping issue is addressed in the revised draft resource reports. Those issues that require information not included in TC Alaska's draft resource reports have been highlighted in yellow for easy identification.

A second table in the enclosure lists other comments/topics raised during scoping that are not issues appropriate for inclusion in the environmental impact statement.

Thank you for your continued cooperation. If you have any questions regarding these comments, please contact L.J. Sauter, Jr. at (202) 502-8205.

Sincerely,

Michael J. Boyle  
Deputy Director  
Division of Gas – Environment  
and Engineering

Enclosure

cc: Public File, Docket No. PF09-11-000

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**Environmental Issues and Concerns Identified During the  
Public Scoping Process for the Alaska Pipeline Project**

Issues/Concerns to be Addressed in the EIS	Commenter(s)	Location
<b>General</b>		
Questions regarding the purpose and need statement. Suggest it include: <ul style="list-style-type: none"> <li>▪ alliances with ANCSA village corporations</li> <li>▪ how pipeline will meet US energy needs</li> <li>▪ the intent of Congress in settling the aboriginal land claims in Alaska with respect to resource development and business opportunities for Alaska Native organizations</li> </ul>	Environmental Protection Agency (EPA), Tanana Chiefs Conference (TCC), Northern Alaska Environmental Center (NAEC), Individuals <sup>1</sup>	
Potential transboundary effects	EPA	
Accuracy/viability of the most recent data available	Individual	
Agencies must ensure compliance with mitigation measures	Individual	
Mitigation should be designed with input from those experiencing the impact (i.e., consider adaptive management techniques for implementing effective mitigation)	EPA, TCC	
Assurance of proper inspection/oversight	EPA, NAEC, Individual	
Identify entities responsible for conducting mitigation; include local Natives	EPA, NAEC, Individual	
<b>Project Description</b>		
The locations of gas take-off points in Alaska	NAEC, Individuals	
Water requirements for project-related activities	EPA	

Potential impacts of the Gas Treatment Plant's (GTP) underground injection control sites, number of wells planned, and injection fluid composition	EPA, Individual	
Adequate mitigation should be developed for the West Dock modifications and the associated dredging	EPA, NAEC	
<b>Alternatives</b>		
Consider alternative sources of energy (including conservation, renewables, cryogenic energy)	EPA, Individual	
Consider pipeline route alternatives, including at the Canadian border ("Upper Tanana Alternative"), especially near residences	EPA, Din e'h LLC (Din e'h), Organized Village of Kwethluk, Individuals	
Consider aboveground alternatives for the Point Thomson segment (i.e., place pipeline on vertical support members)	EPA	
Include a pipeline to transport natural gas to an LNG facility at Valdez as an alternative	EPA, NAEC	
Consider alternative sites for aboveground and associated facilities, especially where they conflict with sensitive features	EPA, Din e'h	
Consider alternative river crossing methods and designs (vertical support members, HDD, bridges) to limit impact on fisheries (subsistence)	EPA	
Include consideration of alternative (variable) pipeline diameters and multiple pipelines	EPA	
Consider transportation system alternatives	EPA	
Consider alternatives to dredging and open-water disposal (i.e., onshore beneficial use)	EPA	
Consider alternative locations for the planned West Dock Modifications	EPA	

Consider alternatives to crossing the Tetlin National Wildlife Refuge (NWR)	Diné'eh	
<b>Geology and Soils/Seismicity/Permafrost</b>		
Seismic risk to pipeline integrity at active and inactive fault crossings, and mitigation measures	EPA	
Potential for construction and operational activities to increase seismic activity	EPA	
Impacts of surface disturbance on permafrost	EPA	
Thermokarst effects from fugitive dust in permafrost areas, especially along access roads and at pads	EPA, Individual	
Damage to the buried pipeline from melting permafrost and subsequent erosion	Individual	
<b>Water Resources</b>		
Project impacts on water resources and water quality	EPA, NAEC	
Identify all water withdrawal sources and rates, discharge locations and methods, use and disposal of chemicals, and mitigation/control measures	EPA, Diné'eh	
Project impacts on public drinking water supplies, including source water protection areas	EPA	
Clean Water Act (CWA) 303(d)-listed water bodies potentially affected by the project and mitigation measures for avoiding their further degradation	EPA	
<b>Wetlands</b>		
Project adverse effects on wetlands and other aquatic resources be minimized such that the goal of no-net-loss would be met	EPA	

<b>Vegetation, Wildlife, and Aquatic Resources</b>		
Impacts on fish and fisheries, wildlife, and vegetation	EPA, NAEC, Individuals	
Impact on female polar bears denning along the segment from Point Thomson to Prudhoe Bay	Individual	
Impact on anadromous fish and/or resident fish species, and fishery resources resulting from water withdrawal (including impacts on Putuligayk River)	EPA	
Impacts from invasive species associated with ballast water, and mitigation measures to minimize adverse impacts on the marine environment	EPA	
Use of native species for restoration	EPA, NAEC, Individual	
Project impact on marine and nearshore habitats on the North Slope due to vessel traffic, dock modifications, and dredging	EPA, Individual	
Impact of aboveground segments of Point Thomson pipeline on caribou crossings	Individual	
<b>Threatened, Endangered, and Other Special Status Species</b>		
Impacts on protected species and their critical habitat	EPA	
<b>Land Use, Recreation and Special Interest Areas, and Visual Resources</b>		
Impacts resulting from crossing the Tetlin NWR	Din e'h	
Consistency of the planned Tetlin NWR crossing with the Alaska Native Claims Settlement Act and Alaska National Interest Land Conservation Act	TCC, Din e'h	
Unresolved land ownership and aboriginal land claims	Din e'h, TCC	
Impact of the planned project on federal or state-designated trails	Din e'h	

Conflicts between the planned location of project facilities and sensitive areas	Din e'h	
Consistency of the planned project with long-term community plans, land use plans, and other resource planning documents for individual villages along the project corridor	TCC	
Consistency/conflict of the pipeline with planned projects that could occur within ¼ mile of the right-of-way (ROW) in the Din e'h region	Din e'h	
Access to pipeline ROW for recreation	EPA, Individual	
Conflict with traditional subsistence land uses	Din e'h	
<b>Socioeconomics and Environmental Justice</b>		
Inclusion/analysis of the Yukon-Tanana and Upper Tanana as individual subregions and separate from the Southeast Fairbanks Census Region	Din e'h, TCC	
Analysis should focus on impacts both at the borough level and on the small Native communities along the planned route	EPA, Din e'h, TCC, Individual	
Include analysis of using the natural gas to provide lower home heating costs to Alaska villages	TCC	
Discuss the impacts of possible gas take-off locations on the communities (Kaktovik mentioned)	Individuals	
Project may cause out-migration from Tribal communities	Individual	
Discuss the effects previous pipelines have had on the Native communities in the project area	TCC, Individuals	
Beneficial impact of training and hiring Native (local) people for project construction; provide Natives with preferential work and contracting opportunities	EPA, Din e'h, TCC, Individuals	

Impact of planned project on property values	Individuals	
Impact on sanitation, roads, and other infrastructure needed to support the planned project	Din e'h, Individuals	
Potential for higher food and utilities costs in Native communities due to the project	Individuals	
Potential for Environmental Justice issues for Alaska Natives	EPA, Din e'h, TCC	
The potential for disproportionately high and adverse health or environmental effects on Alaska Native communities without the provision for meaningful input opportunities	EPA	
Include analysis of in-state gas use, in-state liquids use	TCC, Individual	
<b>Subsistence</b>		
Impacts on the mixed subsistence economy	EPA, Din e'h, Individual	
Impacts from barge/vessel traffic on subsistence resources (bowhead whale migration)	EPA, Individual	
Impacts on subsistence resources and hunting from restricted access near pipeline corridor	Individual	
Impacts of noise on subsistence hunting (especially whaling)	NAEC, Individual	
Impacts on caribou herds and their migration patterns	Individuals	
Impacts on subsistence fishing (gravel placement and culvert size; need for causeways or fish passages)	TCC, Individual	
Project activities that would shortened the moose season	Individual	
Impacts on traditional hunting, fishing, and subsistence activities of an Upper Tanana route alternative	Din e'h	
Impacts on subsistence activities from low-flying planes used to monitor the pipeline	Individual	



Include regular consultation with Alaska Natives	TCC	
Traditional knowledge should be integrated into the analysis	EPA	
<b>Cultural Resources</b>		
Potential negative socio-cultural impacts in areas where there are traditional cultural practices	EPA	
Impacts on cultural resources, including sacred sites; traditional cultural properties and landscapes; traditional hunting, fishing, and gathering areas; traditional resources and use areas; changes in hydrology or ecology of traditionally used water sources (seeps, springs, wetlands); historical and traditional travel routes; and historic districts.	EPA	
<b>Air Quality</b>		
Construction and operating emission impacts on air quality from all major project facilities, including compressor stations and the GTP	EPA, NAEC, Individuals	
Impacts on ambient air conditions and values	EPA	
Need proper locations for air monitoring stations	EPA	
Impacts of black carbon emissions (from ships and diesel engines) to accelerate nearby snow/ice melt	EPA	
Consider magnitude and significance of fugitive dust emissions	EPA	
Impacts of air emissions from vehicles and marine vessels/barges (include NPS and ADEC data)	EPA	
Toxic air emissions and impact on sensitive receptors	EPA	
Air emission impacts on non-attainment areas	EPA	
Consideration of restrictions on flaring and other oil and gas emissions	Individual	

<b>Climate Change and Greenhouse Gas (GHG) Emissions</b>		
Effects of climate change on project infrastructure, and effects of project on climate change	NAEC, Individual	
Consider direct and indirect GHG emissions, and mitigation measures to reduce project-related GHGs	EPA	
<b>Noise</b>		
Construction and operating noise impacts on local residents, including blasting	EPA, NAEC	
Impacts of noise on wildlife, fish, migratory birds, and marine mammals	EPA, NAEC	
Impacts of noise and vibrations on subsistence resources (including whaling)	NAEC, Individuals	
Impacts on tourism and wild land recreation	EPA, NAEC	
<b>Public Health</b>		
Impacts on human health should be documented in a Health Impact Assessment (coordinated with locals)	EPA, TCC	
To identify impacts on existing health services, conduct a baseline health profile for villages along the corridor	TCC, Individual	
Impacts of air emissions on respiratory disease, including in infants	Individuals	
Health impacts from disruption in traditional food consumption	Individual	
Health impacts from vehicular air emissions and fugitive dust emissions during construction and operation	EPA	
Impacts from invasive species associated with ballast water and mitigation measures to minimize adverse impacts on human health	EPA	

<b>Reliability and Safety/Spill Management/Hazardous Materials</b>		
Pipeline corrosion and integrity; maintenance in absence of access roads	NAEC, Individuals	
Coastal erosion rate for the pipeline between Point Thomson to Deadhorse, and its effect on long-term pipeline integrity	Individual	
Emergency planning, response, and clean up measures if accident occurs involving natural gas or hazardous materials/waste release	EPA	
Proximity of High Consequence Areas to residential areas (mentions MP 643.5 residential area)	Din e'h	
Solid and hazardous waste management	EPA	
Hazards of oil and petroleum product storage along corridor	EPA	
Accidental releases of toxic materials to land and water	EPA, Din e'h, Individual	
Impacts of herbicides/pesticides use during all project phases, and impact minimization	EPA	
Concern with crossing/disturbing existing contaminated sites along pipeline ROW	EPA, TCC	
Safe distance/safety aspects of APP to existing facilities and residences	EPA, Individuals	
<b>Cumulative Impacts</b>		
List of planned developments on Din e'h partner lands – several projects within 0.25 mile of corridor	Din e'h	
Impacts of Alberta Tar Sands development with planned project	NAEC	
The Point Thomson (Field) Development Project, and contributions to existing on- and off-shore impacts	EPA, NAEC, Individual	

Alaska Stand Alone Gas Project	NAEC	
North Slope natural gas development (well pads, gathering lines, etc.)	EPA	
Include assessment of offshore Beaufort and Chukchi Sea and on-shore oil exploration	NAEC, Individual	
Indirect and cumulative effects of fugitive dust contributions to thermokarsting of permafrost areas	EPA	
Indirect and cumulative effects on air quality	EPA	
Quantified cumulative impacts of GHG emissions over the life of the project	EPA	
Expansion of highway operations to Franklin Bluff	Individual	
Oil and gas and road activities at Umiat	Individual	
Cumulative impacts of additional construction ROW restrictions on hunting areas	Individual	
Impacts on Native communities combined with previous pipelines in the project area (i.e., TAPS)		
Consider other federal actions, i.e., <ul style="list-style-type: none"> <li>▪ Arctic National Wildlife Refuge Comprehensive Conservation Plan/EIS</li> <li>▪ National Petroleum Reserve – Alaska Integrated Activity Plan/EIS</li> <li>▪ Trans-Alaska Pipeline System Renewal EIS</li> <li>▪ Effects of Oil and Gas Activities in the Arctic Ocean EIS</li> <li>▪ Trans-Alaska Gas System EIS</li> </ul>	EPA	

- 1 Individuals include Rosemary Ahtuanguak, Clarice Akootchook, Mary Corcoran, Jeff Gavazza, Larry Gierke, Peter Hallgren, Ben Hundsaker, Bob Sattler, Bruce Inlangasak, Doug Isaacson, George Kaleak, Harry Lord, Brian McNeil, Thomas Napageak, Ed Nukapigak, Jean Public (author of a written comment), Edward Rexford, Cindy Roberts, Patrick Schlichting, Ken Sims,

George Tagarook, Vera Williams, an unidentified speaker, and an anonymous author of a written comment.

Comments by Robert Brean have been attributed to “Din e’h,” and those by Pamela Miller to “NAEC.” In most cases, comments by Bob Sattler have been attributed to “TCC.”

<b>Comments/Topics Not Appropriate for Inclusion in the EIS</b>	<b>Commenter(s)</b>
TCC request for Cooperating Agency status	TCC
TCC request for the right to intervene in the NEPA process	TCC
Consideration of forming a Citizen’s Advisory Council or Native Policy Board for APP	Individual; TCC
Coordination of NPDES permit issues with EPA and ADEC	EPA
Include steps to ensure anti-degradation provisions of the CWA would be met	EPA
Consideration of partnerships or business relations with Native communities for employment on APP	TCC
Tribal involvement (subsistence, cultural resource management)	TCC; Din e’h
Preparation of a Programmatic Agreement for addressing adverse effects on cultural resources	TCC
Consideration of covering travel costs of Tribal participants for G2G meetings	Individual
Resolution of issues of the Tetlin National Wildlife Refuge land exchange	Din e’h
Resolution of issues regarding access to Din e’h lands (finalization of binding agreements for access permits)	TCC; Din e’h
Concerns over APP contracts awarded to outside companies when Din e’h requested participation	Individual
Request for user-friendly involvement process (e.g., local times for deadlines for comments; meeting schedules)	NAEC; Individual
Consideration of subsistence and other traditional activities when scheduling meetings	Din e’h LLC
Consideration of another scoping period after resource reports are finalized	NAEC
Transparency – Request for information to be made available earlier in the process (concern over amount of privileged, sensitive, or proprietary information -- affected landowner data, Essential Fish Habitat, biological assessment, cultural resources information, ethnographic reports, raptor nest	TCC; Din e’h; NAEC; Individual

locations)	
Impacts of gas explosion in Valdez Harbor	Individual
Development of a timeframe for release of emissions over the life cycle of the proposed project	EPA
Consider more than existing databases for health information – Health Impact Assessment is weak and State proposals are inadequate	Individual
Disclosure of open season results	Individual
Numerous suggestions on how to prepare an EIS	EPA
Reminders of the permits necessary for the project	EPA
Suggestions that FERC conduct it's analysis in compliance with related environmental statutes	EPA