



## **Alaska LNG Project: Concerns Related to National Parks and Opportunities for Engagement**

The Alaska Gasline Development Corp. (AGDC) is proposing to construct an 800-mile natural gas pipeline across the interior of Alaska with a daily maximum capacity of 3.3 billion cubic feet of natural gas. The overall project includes a Gas Treatment plant (GTP) at the beginning of the line, located in the oil and gas fields on the north slope of AK, eight compressor stations and one heater station along the 800-mile pipeline and a natural gas liquefaction facility and export terminal at the end of the pipeline located on the Cook Inlet of southern AK.

Pollution from these project sources are protected to affect air quality Denali (a Clean Air Act designated Class I area meaning that it's air is specially protected from pollution) as well as Gates of the Arctic and Lake Clark national parks and a number of other protected public lands.

### *Forthcoming processes (focused on air)*

- **FERC Approvals:** The overall project requires a certificate of public convenience and necessity from FERC. FERC is the lead agency. A DEIS issued during the summer of 2019, comment period closed October 3<sup>rd</sup>.
- **ADEC Permits:** The Alaska Department of Environmental Conservation (ADEC) is the air permitting authority for each of the individual facilities. The GTP and liquefaction facilities are Clean Air Act Prevention of Significant Deterioration (PSD) sources meaning that they must obtain individual PSD air permits from ADEC, applications have been submitted. The compressor stations and heater station are Clean Air Act Title V sources and must obtain individual Title V operating permits from ADEC.

### *Concerns*

1. FERC's NEPA air modeling analysis does not adequately evaluate the direct effects of the proposed action, as it modeled each facility (i.e., GTP, compressor stations, liquefaction facility) individually using separate air quality modeling analyses. NEPA requires the total impacts of a project to be evaluated (indirect and direct) and also requires that a project be assessed such that cumulative (existing or reasonably foreseeable) emissions include other sources in the area as well as pollution from the project itself.
2. FERC's modeling, even while inadequate, projects visibility and deposition impacts at Denali, Lake Clark and Gates of the Arctic. Specifically:
  - Nitrogen deposition impacts at Denali and Lake Clark
  - Sulfur deposition impacts at Lake Clark

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- Visibility impacts at Lake Clark and Gates of the Arctic

These models show that separately, these sources would impact visibility and deposition at these parks. However, the models only look at impacts close to the sources (so we don't know whether and to what degree areas farther away would be harmed) and fail to look at the total pollution impact of the full project at the parks (meaning that if the total impact of all sources is assessed you would be looking at a greater magnitude of emissions with a likely result that the full project would cause far greater harm at parks than any individual part of the project alone.)

3. NPS has raised concerns about "Class II parks" – Lake Clark and Gates of the Arctic, for which they have authority and are mandated to protect and manage resources. The Clean Air Act does not provide the same level of protection for Class II areas however, the Act does require Class II parks be assessed for PSD permits, NEPA also requires an evaluation of environmental impacts at Class II parks. ADEC submitted DEIS comments arguing that FERC's treatment of Class II areas is improper and we are concerned that this is a maneuver to politically undermine protections required for Class II parks. For the time being, FERC appears to be amply regarding Class II areas protections but we recognize that may change.

*What we want, for now*

1. Comprehensive assessment of the pollution impacts from the whole of the AK LNG project on the parks – so FERC/company needs to do cumulative air modeling.
2. Ensure that Class II areas remain protected by implementing and enforcing requirements that impacts to Class II parks be assessed and aptly mitigated.
3. If assessments of the full scale of emissions impacts are assessed and found to hurt park resources, we'd want emissions to be mitigated (eg. lower NOx emission rates at compressor stations) so that park harm doesn't occur or is as minimal as possible

*Opportunity for engagement:* evaluate DEIS record post Oct 3<sup>rd</sup> deadline. Once FEIS issues, assess litigation. Engage in PSD permitting process.