

1 Thank you.

00284

2 INTERPRETER: (In Inupiat)

3 HEARING OFFICER GEARY: Patsy Aamodt.

4 MS. AAMODT: Good evening. My name is
5 Patsy Aamodt. I am the president of the Native Village
6 of Barrow, Traditional Government. I'd like to introduce
7 my daughter Avaiyak Aamodt, she's sitting right behind
8 me.

9 I asked her to come in. We were
10 listening to the radio tonight and thought we'd be
11 driving around, head out to the point and check out the
12 polar bear and all but started thinking about the
13 importance of this meeting so I come unprepared but I do
14 have a couple points I'd like to make.

15 My grandfather, worked out there at the
16 Naval Arctic Research Lab, you know, that Naval Base out
17 there in the construction phase of it and my father also
18 worked out there and here I am, I am a mother of two
19 children and still this NPRA still is touching our lives
20 in a big way.

21 Both my grandfather and my grandmother
22 had some education, primarily elementary and also my
23 father went as far as the eighth grade and my mother did
24 not attend school. She grew up with her brother out in
25 the Cape Halcut area and none of them went to school as

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1 far as I know. And I, along with the people of my
2 generation attended school and like a lot of the people I
3 grew up with we had to leave hundreds and hundreds of
4 miles from our home to attend high school. And while I
5 was in high school, I decided after my dad had taken to
6 me to Fairbanks that I wanted to go off to the university
7 and I went to the University of Alaska-Fairbanks and
8 graduated from there in 1973 with a bachelors in
9 education and went back and got a masters in public
10 school administration. Later I went to the Harvard
11 Graduate School of Education and obtained a certificate
12 of advanced study and administration planning and social
13 policy.

14 My work life has primarily been in
15 education but after I retired from the school system I
16 became involved in tribal affairs. And it wasn't really
17 by choice because I thought I had really no interest
18 there but since I have been involved, I have seen the
19 importance of voicing our concerns. Our elder, Noah, my
20 uncle stated earlier and I failed to mention this that so
21 many times our people make statements and those
22 statements are heard superficially, nothing ever gets
23 beyond that. It's just a cursory -- I guess it's just
24 cursory listening and it's just hope that it goes beyond
25 that with the statements that he made tonight.

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1 And he also wished that the statements
2 made by other elders and other people are going to be
3 truly heard and I do hope that's the case.

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(Cont.)

4 I mentioned earlier that oil has affected
5 our lives, at least my family life starting from my
6 grandfather on to my children and it's so important that
7 with the Trans-Alaska Pipeline, that there be really
8 tight regulations for making sure that there is
9 maintenance and there's upkeep. We have a cabin down at
10 Cape Simpson area and not too far from that Cape Simpson
11 area are some old exploratory wells and we do quite a bit
12 of snowmachining, we do a lot of caribou hunting, we do a
13 lot of fishing and we also hunt for the geese when they
14 come in the spring and so we're out there quite a bit.
15 In fact, my husband and my son are stranded out there, I
16 might say happily stranded out there with the ice
17 conditions. And so we're around that country a lot. And
18 last year, I believe it was, we were out snowmachining,
19 my husband and I and came across this old exploratory
20 well and we were just shocked. To us there was a big
21 puddle, big pile of oil. And so we reported that and
22 someone within BLM or some entity had the audacity to
23 point out to me and my husband that we had been the ones
24 trying to get oil from that oil well and caused that oil
25 spill to occur, raw oil. And later on we heard that

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1 person was operating out of misinformation and I'm glad
2 that it worked out that way because we certainly are not
3 going to spend a whole lot of time, neither do we have
4 the technical skills to jerry-rig anything that would
5 take oil from -- I mean raw oil, at that stage and take it
6 for our own use.

7 And I just read a report on that same oil
8 spill, that there are problems in trying to get monies
9 reimbursed or, you know, funds to take care of that
10 cleanup. And I would hate for my daughter or her
11 children to appear before another body such as the body
12 that we have right here 30 years from now talk to the
13 people about the lack of maintenance and the lack of
14 responsibility in addressing issues such as oil spill out
15 there. We had a little bear, a young -- it wasn't really
16 a cub, it was not really a mature bear, come to our cabin
17 in the summer, I think it was two summers ago and that
18 poor thing was all covered with oil and again, it goes
19 back to the exploratory wells that were not maintained at
20 all. In fact, the same, whatever it -- you know, all
21 that gear that was used to cap them rusted, seeping and
22 30 years from now I do not want my daughter or
23 grandchildren to appear before a body such as this and
24 say I remember my mother talking about this 30 years ago
25 and still this thing is going on.

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(Cont.)

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1 And I know that I speak not only for my
2 family but also for others.

3 It is so hard to explain. It is so hard
4 for us, who are from up here and maybe traditionally
5 people who subsist on game around our home areas, it's so
6 hard to explain the importance of what we catch. Like
7 last year, my son did not come into do his usual hunt
8 like, for the bearded seal and the - for the bearded
9 seal and I have extended family and I was able to get
10 some from them but this summer my son came and caught the
11 bearded seal and so I had more than enough to, not only
12 share with my immediate family but extended family not
13 only here in Barrow but elsewhere, too.

14 So all these things such as oil spills do
15 have an impact on our way of life and it is very
16 difficult when you have to depend on other people who may
17 have been able to hunt in another area who were blessed
18 to catch what we need to eat during the course of the
19 year.

20 Sure we can live on hamburger. Sure we
21 can live on chicken. Sure we can live on pork. But you
22 know what it never satisfies our hunger. When we eat our
23 traditional foods, whether it's sea mammals, caribou or
24 fish, it takes care of our hunger. But when we have to
25 live on hamburger and chicken and pork, that hunger never

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1 goes away and it's a fact. It would be just like you
2 people who may be used to that food, if you were sent
3 someplace else and had to live with the food that is
4 common in that area you would be very hungry for whatever
5 your favorite food is.

6 So it is very important that you people
7 who are in key decision-making positions, that you have
8 very stringent guidelines in making sure that the
9 maintenance and the upkeep of the pipeline is held to a
10 very high standard. And it is also imperative that the
11 local companies do the work. I am an ASRC shareholder, I
12 am a USC shareholder. And it is very unlikely that I
13 could go to Phillips Company and have them do something
14 that would benefit not only myself but the people here.
15 Sure, there may be a few thousand dollars that may be
16 given to some entity for a donation but you know what,
17 all of this development has impacted our lives so much,
18 Charlie pointed that out, there are a lot of social ills.
19 There's a lot of good that also has come from it. But
20 the tribal entities are the ones who end up having to
21 try, with very limited resources, to try and help our
22 people who may be unemployed, who may be hungry, who may
23 not have enough to take care of their fuel costs and
24 things of that nature.

25 So I may have a conflict but I tell you

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284-3
(Cont.)

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1 it's a lot easier to approach our regional corporation
2 and our village corporation to help in any way they can
3 than it is for me to go to big oil company and ask for
4 assistance.

284-4
(Cont.)

5 Anyway, I've spoken a lot more than I had
6 planned. But again, I would encourage you as decision-
7 makers to take your role very seriously and I pray that
8 my daughter or my grandchildren will not appear before
9 another body such as this 30 years from now and beg that
10 something be done about the poor maintenance, if that's
11 the case, of the Trans-Alaska Pipeline.

12 Thank you.

13 INTERPRETER: (In Inupiat)

14 MS. IPALOOK-FALK: Could I make a comment
15 before you close?

16 HEARING OFFICER GEARY: Certainly.
17 Please come forward and state your name. 00285

18 MS. IPALOOK-FALK: My name is Martha
19 Ipalook-Falk. And I would like to make comment on what
20 Pat had to say about her father he may have gotten an
21 eighth grade education but John, Sr. was in the first
22 and second legislation sessions for the state of Alaska
23 from 1959 through 1961. So Pat Aamodt and all of our
24 individuals that are here tonight that have made
25 testimony are following in the footsteps of our fathers

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1 who are the first stewards of our natural resources and
2 it is our responsibilities as Inupriats to continue to
3 testify and stand and represent our people and educate
4 you time after time after time with these testimonies
5 whenever you come for your public hearings.

6 But I wanted to emphasize the fact that
7 her father may have just have gotten an eighth grade
8 education but he was one of our leaders to represent our
9 region as Inupriats in the Alaska Legislative body down in
10 Juneau. And I worked there down with our legislator for
11 seven years from 1989 to 1996 so I just wanted to make
12 that comment.

13 INTERPRETER: (In Inupiat)

14 HEARING OFFICER GEARY: I've no
15 additional speakers scheduled or signed up to speak
16 tonight. I want to thank you all for your comments and
17 your attention. This concludes the seventh hearing into
18 the public comments concerning the proposed renewal of
19 the Right of Way Trans-Alaska Pipeline system. I declare
20 these hearings closed. Off record.

21 (END OF PROCEEDINGS)

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C E R T I F I C A T E

UNITED STATES OF AMERICA)
) ss.
STATE OF ALASKA)

I, Joseph P. Kolasinski, Notary Public in and for the state of Alaska, and reporter for Computer Matrix Court Reporters, LLC, do hereby certify:

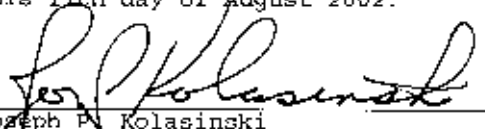
THAT the foregoing Bureau of TAPS Renewal DEIS Hearing was electronically recorded on the 9th day of August 2002, in Anchorage, Alaska;

That this hearing was recorded electronically and thereafter transcribed under my direction and reduced to print;

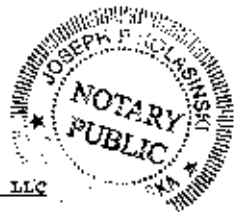
That the foregoing is a full, complete, and true record of said testimony.

I further certify that I am not a relative, nor employee, nor attorney, nor of counsel of any of the parties to the foregoing matter, nor in any way interested in the outcome of the matter therein named.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal this 17th day of August 2002.



Joseph P. Kolasinski
Notary Public in and for Alaska
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Responses for Document 00272

- 00272-001:** Thank you for your comment.
- 00272-002:** The BLM and member agencies of the JPO use an adaptive management approach to evaluate the effectiveness of stipulations and regulatory oversight. Ongoing monitoring programs, as identified in the 12 Comprehensive Monitoring Reports published since 1996, provide BLM and JPO with the necessary information to evaluate the effectiveness of stipulations in the Grant and Lease.
- The reader is referred to Section 4.1.1 (JPO oversight) and specifically to Sections 4.1.1.2 (Adaptive Nature of the Grant in Compliance Monitoring), 4.1.1.3 (Risk-based Compliance Monitoring), 4.1.1.4 (JPO Comprehensive Monitoring Program), and 4.1.1.8 (Coordinated Planning and Response to Abnormal Incidents) for more information on the role of adaptive management as a JPO business practice.
- 00272-003:** The reader is referred to Section 2.5 of the FEIS, "Alternatives and Issues Considered but Eliminated from Detailed Analysis."
- 00272-004:** Members of the public have an opportunity to contribute to the development of an EIS through public participation in the National Environmental Policy Act process. Such participation can occur early in the NEPA process during public scoping, and later in the process during comments on the draft EIS. The comment currently of interest, and this response, are part of the latter process. Moreover, Iñupiat and other Alaska Native peoples living in the vicinity of the TAPS have been included in the decision-making process through government-to-government consultations, which for the ROW renewal have been ongoing since April 2001 (see Table 4.3-22). Results in the EIS, in turn, are considered carefully in deciding whether to renew the ROW (see Section 1.2).
- 00272-005:** Discussion has been added to Section 4.7.7.3.2 on factors that can influence the size and distribution of caribou herds. The text in Sections 4.3.20 and 4.7.8.1 similarly has been modified to address the issue of modified caribou mobility due to oil-related infrastructure. No single factor is responsible for shifts in caribou distributions within the North Slope.
- 00272-006:** Hazardous wastes are managed routinely along the TAPS corridor. Please see EIS Section 3.16 and Section 4.3.12, Hazardous Materials and Waste Management, for a thorough discussion on this subject.
- 00272-007:** The EIS recognizes the cultural stress that results from a rapid change in lifeway and the sudden, intense exposure to a new culture. This EIS focuses on the impact of the renewal of the TAPS right-of-way. While a brief discussion of the cumulative effects on Alaska Native cultures from other actions in the TAPS region of influence is included in Section 4.7.8, a detailed discussion of cumulative effects of all energy development on the North Slope Borough is beyond the scope of this EIS. Discussions of the role of energy companies of the state of Alaska in remedying the effects of development are also beyond the scope of this document.
- 00272-008:** The EIS considers Section 29 of the Federal Grant of Right-of-Way for the TAPS in the evaluation of impacts to sociocultural systems under the proposed action (see Section 4.3.21). Section 29 addresses Alaska Native training and hire for work on the TAPS. Specifics concerning the application of Section 29, or any modifications to this or any other part of the ROW agreement, are outside the scope of this EIS.

00272-009: The opening of the Haul Road/Dalton Highway to all traffic has clearly created additional demands for emergency and other public services provided by the North Slope Borough. While the analysis of any proposed change in the fiscal relationship between the North Slope Borough and the state in order to secure funding for the additional services is beyond the scope of the EIS, text has been added to section 4.7.8.3 to include the cumulative impacts on public services of operating TAPS, the proposed natural gas pipeline and the Haul Road/Dalton Highway open to all traffic.

See Section 2.5 for a discussion as to why issues relating to Dalton Highway operation were not included as alternatives in the EIS.

00272-010: Section 3.26.2 addresses the cultural resource surveys conducted prior to construction of TAPS. This section acknowledges the strengths and weaknesses of these surveys. This section also discusses the potential historic significance of TAPS itself. Section 4.3.22 identifies the process for identifying historic properties whether archaeological, traditional cultural properties or historic structures including TAPS and the process for appropriately considering them under Section 106 of the National Historic Preservation Act.

00272-011: The promised use of TAPS communications for uses other than TAPS operations is outside the scope of the DEIS.

00272-012: The current Federal Grant and associated stipulations, along with the provisions of TAPAA, provide BLM with extensive and ongoing regulatory control of TAPS operations. These conditions would not change upon renewal.

The reader is referred to Section 4.1.1 (JPO oversight) and specifically to Sections 4.1.1.2 (Adaptive Nature of the Grant in Compliance Monitoring), 4.1.1.3 (Risk-based Compliance Monitoring), 4.1.1.4 (JPO Comprehensive Monitoring Program), and 4.1.1.8 (Coordinated Planning and Response to Abnormal Incidents) for more information on the role of adaptive management as a JPO business practice.

00272-013: Although 45 days is understandably a short time to review a document of this size, the time period is consistent with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act regarding the review of draft environmental impact statements. Significant effort was made to advise people of the schedule and duration of the review well in advance (one year). The DEIS was published on schedule and many substantive comments on the content of the DEIS, including yours, were received during the 45-day period.

While comments on the DEIS had to be received by the end of the 45-day comment period in order to be addressed in the Final EIS, additional provisions for involvement in the decision-making process apply to Tribal governments and Native organizations. The process of government-to-government consultation allows these groups to continue dialogue with the Bureau of Land Management.

00272-014: The reader is referred to Section 2.5 of the FEIS, "Alternatives and Issues Considered, but Eliminated from Detailed Analysis."

00272-015: The use of APSC facilities for medical emergencies is outside of the scope of the DEIS.

Responses for Document 00273

- 00273-001:** Thank you for your comment.
- 00273-002:** The reader is referred to Section 2.5 of the FEIS, “Alternatives and Issues Considered but Eliminated from Detailed Analysis.”
- 00273-003:** Thank you for your comment.
- 00273-004:** Discussion has been added to Section 4.7.7.3.2 on factors that can influence the size and distribution of caribou herds within the North Slope. In addition, Sections 4.3.20 and 4.7.8.1 have been modified to include discussions of affects on caribou movement, and on subsistence harvest area, due to the development and use of oil-related infrastructure on the North Slope (specifically with regard to Nuiqsut). No single factor (e.g., oil field development) is responsible for distributional shifts of caribou herd..
- 00273-005:** The opening of the Haul Road/Dalton Highway to all traffic has clearly created additional demands for emergency and other public services provided by the North Slope Borough. While the analysis of any proposed change in the fiscal relationship between the North Slope Borough and the state in order to secure funding for the additional services is beyond the scope of the EIS, text has been added to section 4.7.8.3 to include the cumulative impacts on public services of operating TAPS, the proposed natural gas pipeline, and the Haul Road/Dalton Highway now being open to all traffic.
- 00273-006:** Thank you for your comment.
- 00273-007:** A portion of the direct impact of pipeline operations benefits Alaska Natives, and Alaska Native tribes and villages through the employment of Alaska Natives by the pipeline operators and their contractors, including employment in ancillary services provided by the pipeline company. Proactive programs have been developed to encourage the recruitment and employment Alaska Natives, including North Slope residents, the pipeline company and its contractors. For Alaska Natives residing in incorporated communities, revenue from pipeline operations reach the Alaska Native community through the distribution of oil revenues paid to the state by the oil companies to local community governments to support education and other programs, and through property taxes paid by the oil companies directly to local jurisdictions. The size of the portion of TAPS revenues paid to local governments reaching Alaska Natives depends on the extent to which Alaska Natives receive education services and other public services supported both directly or indirectly by oil revenues.
- For all Alaska Natives, regardless of whether they reside in incorporated communities, oil revenues reach the Alaska Native community through the distribution of the Permanent Fund Dividend, which is derived from earnings from the investment of oil revenues in the stock market.
- Note that Sections 3.25, 4.3.20, and 4.7.8.1 note some of the complications of Alaska Native increased participation in cash economies—the benefits of additional monetary resources offset by possible social stress, reduced social integration, and growing Westernization of many peoples. Also, see Section 4.3.19.6.
- 00273-008:** The EIS evaluates the current provisions of the Agreement and Grant of Right-of-Way for Trans-Alaska Pipeline (see Appendix B). This includes Section 29, which relates to Native training and hiring practices by the permittee (APSC). Specifics of Native training and hiring, how this portion of the agreement is evaluated and enforced, and any possible changes to Native hires or training are outside the scope of this EIS.

Responses for Document 00274

- 00274-001:** Your comments on the potential of the ROW to attract wildlife are noted. Sections 4.3.17.1 and 4.7.7.3.1 address the fact that dust shadows and insect relief can attract wildlife to the TAPS facilities during some portions of the year. Other influences of TAPS on the distribution of wildlife (e.g., using the ROW to avoid hunters) are more uncertain. The growth of the caribou herds over the past 30 years would offset any localized concentrations of caribou within areas where hunting would be limited or prohibited. Subsistence impacts of the proposed action are addressed in Section 4.3.20.
- 00274-002:** The EIS evaluates the current provisions of the Agreement and Grant of Right-of-Way for Trans-Alaska Pipeline (see Appendix B). No section of the Federal Grant explicitly addresses local hires as a whole. Section 29 of the Federal Grant addresses local hiring in the sense that it concerns the training and hiring of Alaska Natives by the permittee (APSC). Specifics of Native training and hiring, how this portion of the agreement is evaluated and enforced, and any possible changes to Native hires or training are outside the scope of this EIS.
- 00274-003:** Thank you for your comments regarding your preference for leaving the Dalton Highway open to all users and enhancing tourism.

Responses for Document 00275

00275-001: Although 45 days is understandably a short time to review a document of this size, the time period is consistent with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act regarding the review of draft environmental impact statements. Significant effort was made to advise people of the schedule and duration of the review well in advance (one year). The DEIS was published on schedule and many substantive comments on the content of the DEIS, including yours, were received during the 45-day period.

While comments on the DEIS had to be received by the end of the 45-day comment period in order to be addressed in the Final EIS, additional provisions for involvement in the decision-making process apply to Tribal governments and Native organizations. The process of government-to-government consultation allows these groups to continue dialogue with the Bureau of Land Management.

00275-002: Operation and maintenance of TAPS are currently permitted activities consistent with the Coastal Management Plan for the North Slope Borough and are in compliance with enforceable policies and applicable Alaska Coastal Management Plan statewide standards. The responsibilities of BLM relative to the Coastal Zone Management Act and the Alaska Coastal Management Plan are described in the EIS in Section 4.3.23.2, "Coastal Zone Management."

00275-003: Sections 4.3.17 and 4.7.7.3 summarize a number of studies on caribou movements for the herds that occur within the North Slope. While some deflections or delays in movement occur to individual caribou from TAPS and North Slope oil facilities, no population level impacts have occurred. Changes in caribou herd size and distribution cannot be explained by a single factor, such as oil field development. Rather, a number of factors can account for such changes. A text addition has been made to Section 4.7.7.3.1 to list these influencing factors.

00275-004: The DEIS clearly addresses indirect and cumulative issues and impacts. For example, the economic analysis examines a number of indirect issues related to the state and national economy. In addition, the subsistence analysis uses traditional ecological knowledge to examine direct and indirect TAPS processes on harvest of plants and animals. Traditional ecological knowledge is often based on observations made by elders.

00275-005: Sections 3.23.2 and 3.23.4 discuss state and regional economic issues, respectively, with the latter focusing on revenues, expenditures, employment, and personal income. Section 4.3.21 discusses Section 29 of the Agreement and Grant of Right-of-Way for Trans-Alaska Pipeline (see Appendix B), which deals with Alaska Native training and hiring by the permittee, APSC. Native representation in individual trade unions is beyond the scope of this EIS.

Responses for Document 00276

- 00276-001:** Prices for gasoline and fuel oil result from market processes over which APSC has no direct effect, and which are beyond the scope of this EIS. Both positive and negative economic impacts of the TAPS and renewal of the ROW for 30 years appear in Sections 3.23 and 4.3.19, respectively. The revised versions of the former section and Section 3.24 both discuss the increased cost of living in rural villages.
- 00276-002:** Neither BLM nor the other JPO agencies are authorized to require or to enforce commitments that are made by APSC or the TAPS Owners directly with individuals or groups.
- 00276-003:** Thank you for your comment. Sections 3.25 and 4.3.21 discuss existing and likely future impacts of the TAPS on Alaska Native and rural non-Native sociocultural systems, which would include impacts on lifestyle. Sections 3.24 and 4.3.20, in turn, discuss existing and likely future impacts on subsistence.

Responses for Document 00277

- 00277-001:** The Native Village of Eyak, as with other federally recognized Tribes, would benefit from state tax revenues generated by the TAPS. The EIS considers existing local taxing authority (see Section 3.23.4.4), which includes the City of Valdez, but not the Native Village of Eyak.
- 00277-002:** The reader is directed to Section 2.5 of the FEIS, "Alternatives and Issues Considered but Eliminated from Detailed Analysis."

Responses for Document 00278

00278-001: The text in Section 4.3.19.2.1 and 4.6.2.19.2 of the EIS has been changed to reflect the forecasted value for North Slope production (8 billion barrels) used in other sections of the EIS, and that the cumulative value of North Slope production is for the period 2004 to 2020.

00278-002: The text in Section 4.3.19.2.1 and 4.6.2.19.2 of the EIS has been changed to reflect the forecasted value for North Slope production (8 billion barrels) used in other sections of the EIS, and that the cumulative value of North Slope production is for the period 2004 to 2020.

00278-003: The 1998 CONCAWE report entitled "Western European Cross-Country Oil Pipelines 25-Year Performance Statistics" appears to be currently unavailable from the Internet.

The more recent CONCAWE report entitled "Western European Cross-Country Oil Pipelines 30-Year Performance Statistics" dated February 2002 is available at http://www.concawe.be/Download/Reports/Rpt_02-1.pdf. This report is an update of the earlier 1998 CONCAWE document.

CONCAWE has collected 30 years of performance data on Western European cross-country oil pipelines. The frequency of spillages has been improved over the 30 years from 1.2 spills per 1000 km of pipeline per year to 0.25 spills per 1000 km per year. The report therefore concluded that overall there is no evidence to show that the aging of the pipeline system poses any greater level of risk.

The spill data for insulated hot oil pipelines in the CONCAWE report is based on transport of fuel oil and other refined petroleum products, and not crude oil. As stated in the report, the great majority of Western European pipelines carry unheated petroleum products and crude oil.

The CONCAWE data was not used in the development of spill scenarios and source terms for the DEIS. The CONCAWE results were referenced to merely point out that the aging of a pipeline does not necessarily lead to the pipeline's degradation.

Responses for Document 00279

00279-001: Thank you for your comment.

00279-002: Thank you for your comment.

Responses for Document 00280

- 00280-001:** Thank you for your comment. The impacts of oil spills on fish and wildlife is included in the TAPS EIS.
- 00280-002:** The EIS evaluates current provisions of the Agreement and Grant of Right-of-Way for Trans-Alaska Pipeline (see Appendix B). This includes Section 29, which relates to Native training and hiring practices by the permittee (APSC). Specifics of Native training and hiring, how this portion of the agreement is evaluated and enforced, and any possible changes to Native hires or training are outside the scope of this EIS. Similarly, which corporations APSC does business with, and the hiring practices of those corporations, are beyond the scope of this EIS. Benefits to rural Alaskans, including Alaska Natives, from state and local government expenditures, are discussed in Sections 3.25 and 4.3.21.

Responses for Document 00281

00281-001: The issue of caribou migration, and possible impacts on caribou migration from the TAPS, activity related to the TAPS (including TAPS-related transportation), and hunters shooting at lead animals appears in Sections 3.21.1.2, 3.24.1, 4.3.17.2, and 4.3.20.

Responses for Document 00282

00282-001: Thank you for your comment. Payments made by oil companies for exploration and development on particular tracts of land are beyond the scope of this EIS. Economic impacts more closely associated with the TAPS are discussed in Sections 3.23 and 4.3.19.

Responses for Document 00283

- 00283-001:** Existing sociocultural conditions, including social problems, are discussed in Section 3.25.2.3. Anticipated impacts under the proposed action of the 30-year ROW renewal, in turn, appear in Section 4.3.21.
- 00283-002:** Sections 4.3.17 and 4.7.7.3 summarize studies on caribou movements within the North Slope, and Sections 4.3.20 and 4.7.8.1 examine potential impacts of the oil industry on subsistence resources (including caribou) in that and other regions along the pipeline. While some caribou experience deflections and delays in movement, no adverse impacts have occurred at the population level. Changes in caribou herd size and distribution cannot be explained by a single effect (such as oil field development), but rather could be due to a number of factors. A text addition to Section 4.7.7.3.1 has been made to discuss these influencing factors
- 00283-003:** The EIS evaluates current provisions of the Agreement and Grant of Right-of-Way for Trans-Alaska Pipeline (see Appendix B). This includes Section 29, which relates to Native training and hiring practices by the permittee (APSC). Currently, no provision exists requiring APSC hiring to focus on individuals living near the TAPS. Specifics of how Native training and hiring are implemented, such as geographic requirements for hired workers, would constitute modifications of the existing Federal Grant and are beyond the scope of this EIS. Similarly, hiring requirements with regard to union membership are outside the scope of the EIS.

Responses for Document 00284

- 00284-001:** In the past decade, the value of Elders' testimony and traditional ecological knowledge has been more widely recognized. This EIS incorporates TEK, drawing on both Elders' testimony and formal studies such as the Ahtna Elders information on salmon. When TEK and other sources of data support different conclusions, analytic judgment is required, and an effort is made to clearly explain the reasoning for the conclusions drawn.
- 00284-002:** Your comment regarding the condition of the sites of some old exploratory wells has been forwarded to the appropriate staff at BLM and the State of Alaska.
- 00284-003:** Sections 3.24, 4.3.20, and 4.4.4.14 of the EIS discuss existing conditions, likely impacts of the proposed action, and likely impacts of spills for subsistence. These and other sections of the EIS attempt to represent the importance of subsistence to Alaska Natives, which is discussed in terms of its economic, sociocultural, and ceremonial roles. The EIS has attempted to point out cases where past impacts or likely future impacts affect subsistence.
- 00284-004:** Which companies APSC does business with is beyond the scope of this EIS. Sections 3.25 and 4.3.21 deal with sociocultural impacts of the TAPS, both positive and negative (including social problems). Local assistance to rural Alaskans, in terms of special programs, infrastructure, and other forms of assistance through public expenditures, are similarly discussed in those sections of the EIS.

Responses for Document 00285

00285-001: Thank you for your comment.

Hughes Village Council
Hut'odleekkaakk'et Tribe
P.O. Box 45029
Hughes, AK 99745

00286

RECEIVED
JOINT PIPELINE OFFICE
02 SEP 11 AM 10:35

July 30, 2002

Pat Pourchot, Commissioner
Alaska Department of Natural Resources
Joint Pipeline Office
411 West 4th Ave., Suite 4C
Anchorage, Alaska 99501

Dear Commissioner Pourchot,

We write today to express our support for the "Request for Expansion of Public Process" submitted on July 19 by Trustees for Alaska on behalf of a broad array of conservation, community, and Tribal organizations. We fully support extension of the deadline for submittal of comments by at least an additional 45 days.

The comment period now runs concurrently with the busiest time of the year for our members' traditional and subsistence activities. We therefore feel that it is necessary to have additional time to analyze and submit comments on the Draft Environmental Impact Statement and State of Alaska's Commissioner's Statement of Reasons and Proposed Written Determination.

286-1

Sincerely,


Ella Sam, First Chief

Cc:
Yukon River Inter Tribal Watershed Council
Alyeska Pipeline Service, Co.
Trustees for Alaska

*Incompleting 2/17/02
C: MR
JM*

DEPARTMENT OF
NATURAL RESOURCES
AUG - 8 2002
COMMISSIONER'S OFFICE
ANCHORAGE

*SAS:AMC/ed
9/17*

Phone (907) 889-2239 - Fax (907) 889-2252

Responses for Document 00286

00286-001: Although 45 days is understandably a short time to review a document of this size, the time period is consistent with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act regarding the review of draft environmental impact statements. Significant effort was made to advise people of the schedule and duration of the review well in advance (one year). The DEIS was published on schedule and many substantive comments on the content of the DEIS, including yours, were received during the 45-day period.

00287

510 540 4165

August 12, 2002

Megan Holloway

PO Box 4864, ♦ Palmer, AK 99645

BLM Director Kathleen Clarke

Subject: Aging Pipeline Requires Environmental Safeguards

Dear BLM Director Kathleen Clarke:

Thank you for the opportunity to comment on this important Draft Environmental Impact Statement for the future safety of the aging Trans Alaska Pipeline (TAPS). Before any pipeline renewal or lease agreement, government agencies must ensure critical safeguards are established.

The 25 year old pipeline has suffered from serious operational and maintenance failures such as the delayed response to the Livengood bullet hole spill, and the 2 foot shift in a section of pipeline at Atigun Pass that went u

287-1

Sincerely,

Megan Holloway

Responses for Document 00287

00287-001: The entire Livengood (or Milepost 400 “bullet hole”) incident response was the subject of an interagency (including industry) report “Joint After-Action Report for the TAPS Bullet Hole Response,” dated February 8, 2002. Major findings include: quick detection of the leak by APSC’s security force; apprehension of the alleged shooter by the state troopers within hours; activation in Fairbanks of the state/federal/industry unified command with several hours; rapid isolation of the affected pipe section and appropriate pressure-relief actions; containment of the spilled oil was effectively achieved with trenches, berms, and pits; safety concerns were appropriately the paramount consideration throughout the incident; and permanent repairs were effected as soon as the situation permitted. A number of recommendations to improve future responses were made. See the text box in Section 4.1.1.8 for a more complete discussion of the MP 400 incident.

Similarly, the situation at Atigun resulted in a series of changes to the way valves are operated to preclude future shifts of the pipeline at the pass.

TO: BLM Director Kathleen Clarke

00288

FROM: Bixler McClure
159 Baker St
Shell Beach, CA 93449

SUBJECT: Aging Pipeline Requires Environmental Safeguards

DATE: August 12, 2002

Dear BLM Director Kathleen Clarke:

Thank you for the opportunity to comment on this important Draft Environmental Impact Statement for the future safety of the aging Trans-Alaska Pipeline (TAPS). Before any pipeline renewal or lease agreement, government agencies must ensure critical safeguards are established.

The 25 year-old pipeline has suffered from serious operational and maintenance failures such as the delayed response to the Livengood bullet hole spill, and the 2 foot shift in a section of pipeline at Atigun Pass that went u

288-1

Sincerely,

Bixler McClure

Responses for Document 00288

00288-001: It is correct that the effects of aging have the potential to impact the integrity and reliability of any mechanical system. However, age alone does not dictate reliability or performance. Myriad factors can impact system performance. For example, the manner in which mechanical systems are operated and maintained can greatly influence their long-term integrity, reliability, and performance.

Utilizing its oversight authority, the JPO ensures that APSC's operating and maintenance procedures take all potential impacting factors into account and are sufficient and appropriate to maintain TAPS integrity. The JPO also has the authority to direct APSC to undertake changes, repairs, or upgrades when that is not the case. Under the reliability centered maintenance (RCM) program, all TAPS subsystems are being carefully evaluated for the consequences of their failure and will have maintenance regimens or remanufacture, overhaul, or replacement schedules established that preclude such failures from occurring, if they would have an adverse impact on public safety or the environment.

The text box in Section 4.1.1.8 provides a synopsis of the MP 400 bullet hole incident. Details of the spill and the response are provided. Changes to the pipeline's spill contingency plan that are being made as a result of lessons learned are also discussed.

Impacting factors such as those that may cause movement in the pipeline are identified in Section 4.2 and are incorporated in analyses presented in Section 4.3. Rather than address each historical event, the analyses used selected events to determine whether pipeline design parameters and ongoing monitoring programs are adequate to identify potentially destabilizing impacts on the pipeline.



Fairbanks Economic Development Corporation

August 15, 2002

State Pipeline Coordinator's Office
State of Alaska
411 West 4th Avenue, Suite 2
Anchorage, Alaska 99501-2343

Dear Sir:

This letter is an expression of support of the Proposed Written Determination of the Commissioner, Alaska Department of Natural Resources concerning the Trans-Alaska Pipeline System (TAPS) Right of Way Lease Renewal. The Commissioner's findings indicate all leases associated with the operation of TAPS have met all the requirements for renewal of the lease.


The Reliability Centered Maintenance report issued by your office has determined the useful life of the TAPS facilities is in excess of 30 years. Therefore, the requested renewal period of thirty (30) years should be approved. A renewal period shorter than thirty (30) years would threaten new investment in North Slope production. As a result, the throughput level of TAPS would be reduced which would adversely affect gross state product, employment, and tax revenues.

289-1

The Alyeska Pipeline Service Company has operated the TAPS efficiently, safely, and with integrity for over twenty-five (25) years. During this time, the pipeline has been under constant monitoring by the public as well as Federal and State regulatory agencies. This system of oversight by State and Federal agencies has been very efficient. We oppose the inclusion of citizen advisory groups in the oversight of the system. The current oversight system has served the residents of Alaska and the citizens of the United States professionally and well.

289-2

A renewal period of thirty years for the TAPS is strongly supported by this organization.

Sincerely,

Dean M. Owen
Executive Director
Fairbanks Economic Development Corporation

*Served
6/17/02*

Responses for Document 00289

- 00289-001:** Although 45 days is understandably a short time to review a document of this size, the time period is consistent with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act regarding the review of draft environmental impact statements. Significant effort was made to advise people of the schedule and duration of the review well in advance (one year). The DEIS was published on schedule and many substantive comments on the content of the DEIS, including yours, were received during the 45-day period.
- 00289-002:** Thank you for your comment. The reader is directed to Section 2.5 of the FEIS and the text that discusses citizen oversight of TAPS.

APPENDUM TO MY TESTIMONY
PUBLIC TESTIMONY REGARDING THE TAPS LEASE RENEWALS
TELS.

00290

FROM: SHEELAGH MULLINS ROWANE
PO BOX 416, CORDOVA, ALASKA 99514
PHONE: (907) 424-7060. EMAIL: sheelaghm@yah
AUGUST 19TH 2002, COH

I ADD THIS MESSAGE TO EXXON IN MY TESTIMONY:-

HONOR YOUR DEBTS NOW TO THE PEOPLE WHO HAVE BEEN SO
ADVERSELY AFFECTED BY YOUR OIL SPILL, BEFORE
ENDANGERING MORE OF OUR ECOSYSTEMS.

WE DID HAVE A HEALTHY HERRING FISHERY PRIOR TO THE
SPILL BUT NO LONGER, DUE TO THE OIL SPILL.

WHY SHOULD WE PERMIT YOU TO RENEW YOUR LEASES
BEFORE YOU HAVE HONORED YOUR ONGOING DEBTS TO US

IMMEDIATELY AFTER THE SPILL YOU TOLD CORDOVANS
AT A CITYWIDE MEETING THAT WE WERE LUCKY THAT WE
WERE DEALING WITH EXXON AND THAT YOU WOULD
"MAKE US WHOLE" HONOR THAT PROMISE NOW.

FROM SHEELAGH J. MULLINS ROWANE

2002/08/19
9:17

290-1

THIS ARTICLE/COMMENTARY WAS PUBLISHED IN THE CORDOVA TIMES, ALASKA 99574. I WISH TO INCLUDE THIS IN THE TAPS RENEWAL DEIS PUBLIC TESTIMONY. S.J. MULLINS ROWANE.

FROM SHEELAGH MULLINS ROWANE, PO BOX 426 CORDOVA AK 99574. Phone (907) 424-700 Fax (907) 424-393 email sheelaghm@yahoo.

Guest Commentary

The Cordova Times

Aug. 15, 2002

Are We the Disposable People?

By Sheelagh Mullins Rowane

FAXED 8/19/02

This letter is to all of the people who have been or could be affected by oil spills.

This is a quote from the Draft Environmental Impact Statement (DEIS) for the Trans Alaska Pipeline System (TAPS) oil pipeline lease renewal, page 4-7-116: "While the Exxon Valdez oil spill was a significant event in the operation of TAPS, creating significant benefits to the state and local economy that more than offset the economic damage to the fishing and tourism industries in Prince William Sound, it is unlikely that a spill of such magnitude, even if it occurred again, would create the same level of economic activity".

This statement is an insult to all of the residents of Prince William Sound and others who make their living here. There is still no understanding by the oil industry of what has happened to us in the 13 years since the oil spill. We continue to be treated as "disposable" people.

I wish to point out to TAPS, Exxon and other oil companies that we had jobs here before they spilled their oil. That we enjoyed the way we lived and worked and did not need their spilled oil for our "economic benefit". Many PWS men and women who work in the fishing industry have the drive and the intelligence, and the education to be working in the high echelons of various industries, including the oil industry, but have chosen to live and work here in a very different type of lifestyle. This does

TAPS LEASE RENEWAL DEIS

FAKED 8/19/06

not make this type of work any the less important in the grand scheme of all of our lives.

In the TAPS DEIS there are other misstatements and misunderstandings of the people and the lifestyles of the Sound and the Copper River Delta. This information is available in the TAPS DEIS documents at the Cordova Public Library for us to be able to read and make an educated response to this situation. The time to act on this very important issue is very limited and comments or phone calls have to be made by Aug. 20. We must speak now or forever hold our peace. Please see the end of this letter for addresses, or contact the Copper River Watershed Project at 424-3334 or the Eyak Preservation Council at 424-5890 for more information.

There is constant talk of the bottom line of the oil companies. The bottom line of the fisheries is also important as well as the promising "clean" business of eco-tourism, which is becoming very important in the long-term plans for the economy of Cordova. Spilled oil doesn't mix well with salmon or eco-tourism.

But it should not be only the almighty dollar that is being discussed in this impact statement. The true bottom line is the health of our area. We, the residents of the Sound and the Copper River Delta, need to be the stewards of this remarkable and exquisitely balanced ecosystem, which has taken eons to develop. Let us try to ensure that our children's children will also witness the migration of the millions of shorebirds and the salmon, and will be able to experience the biodiversity and the beauty and bounty of PWS and the Copper River and delta.

We have learned the very hard way about the broken promises of the oil industry and some politicians. The Copper River and its delta are at risk

SHEELAGH MULLINS ROWANE, PO BOX 416, CORDOVA, AK 99574
TAPS LEASE RENEWAL DEIS.

PAGE 3
(PLUS ADDENDS)

from toxic contamination of North Slope oil. Twenty percent of the aging pipeline crosses 76 salmon-bearing tributaries of the river in remote and earthquake prone areas. How could any spilled oil be contained? Who will be checking? What are the clean up plans?

At the very least, prior to any leases being granted, we must request the following:

- A citizens' oversight committee similar to the Regional Citizens Advisory Council;
- A full pipeline audit now followed by regular audits every year as new science becomes available, particularly regarding global warming and the melting of the permafrost;
- A program to address employee concerns because they are the people who have hands-on experience with possible problems;
- A management which is independent of the North Slope owners.

Lastly we should not have to put up with this uncomfortably rapid lease renewal process without being allowed much more time for public comment ... 45 days is not enough to give to fishermen and others who are in the middle of their working season.

Yours sincerely,
Sheelagh Mullins Rowane

Sheelagh Mullins Rowane has lived in Cordova for nearly 40 years. Rowane has been a commercial fisherwoman since 1963 and was involved from the beginning of Cordova's interests in possible oil contamination from late 1970 and onwards.

Responses for Document 00290

00290-001: The reader is directed to Section 2.5, "Alternatives and Issues Considered but Eliminated from Detailed Analysis."

TAPS EIS comments

Page 1

00291

From: "Thomas Paragi" <tparagi@hotmail.com>
To: <jpoweb@jpo.doi.gov>
Date: 8/20/2002 6:17PM
Subject: TAPS EIS comments

I have tried to send this to a couple JPO email addresses and it has bounced back (including Record@jpo.doi.gov). Could you please route it correctly and let me know that it was received? Thanks,

Tom Paragi
1271 Lowbush Lane
Fairbanks, AK 99709

I support the EIS alternative to renew the Trans-Alaska Pipeline System (TAPS) grant for right of way on federal lands for less than 30 years (commencing 2004) unless the Joint Pipeline Office and oil industry agree to allow an independent audit of TAPS operations, maintenance, and environmental safety prior to grant renewal and at least every five years thereafter during the next 30 years.

291-1

Although outside the scope of the TAPS EIS, I also support formation of a citizen oversight group composed of Alaska residents for independent monitoring of TAPS operations, maintenance, and environmental standards. A recent model for this type of oversight group was the Citizen Oversight Committee for Oil and Other Hazardous Substances, which was formed following the Exxon Valdez oil spill. The TAPS oversight group should have the ability to hire researchers, subpoena witnesses, take testimony, conduct investigations, and appoint advisory panels with specialized knowledge. These abilities are necessary to ensure transparency and adequate disclosure in reporting the status of our aging TAPS during the next lease period, which could be an additional 30 years beyond its original engineered lifetime. The oversight group should include representation from urban and

291-2

rural communities, tourism, fishing/aquaculture, recreation, Native groups,
and environmental organizations.

291-2
(Cont.)

Send and receive Hotmail on your mobile device: <http://mobile.msn.com>

Responses for Document 00291

- 00291-001:** The reader is referred to the material on audits found in Section 2.5, "Alternatives and Issues Considered but Eliminated from Detailed Analysis."
- 00291-002:** The reader is referred to Section 2.5 of the FEIS, "Alternatives and Issues Considered but Eliminated from Detailed Analysis."

Gale Norton
07/24/2002 07:49 PM
To: EXSEC/OES/OS/DOI@DOI
cc:
Subject: DEIS Renewal of the Federal Grant for the TAPS ROW

Julie Bator
<firefly582000@yahoo.com>
07/24/2002 07:47 PM
To: Gale Norton;SIC/OS/DOI@DOI
cc:
Subject: DEIS Renewal of the Federal Grant for the TAPS ROW

Dear Ms. Norton:

I am hoping you will consider an extended time period to review and comment on the DEIS released on the 8th of July. I drafted a letter, and sent it out on the 12th asking for the same.

I have not even received all of the 4 volumes, and I am a Tribal representative, attending all meetings.

I know that you care about the 4 C's, and that you would understand that we are interested in getting this right. It took the BLM 2 years to get to this published point, and I think that we deserve more than 45 days to review it. You see, the review period and deadline comes at a very busy time for us. We have traditionally used summer time to harvest and dry our fish and fall for berry picking and hunting. These events are more than merely gathering food supplies, this is our anchor to our culture. We harvest together, bringing families and communities together. We hunt and share in the work associated with a successful hunt or continue to search until we become successful. These things seem minor to people who live outside of our areas and have only to go to the grocery store to get food, but where we live, hunting, fishing, gathering has taught many lessons, and is the backbone of our society. It is where we learn survival, respect, social order and connect with where and who we are.

Please address this. Please allow us 120 days, and let the deadline be 4 November, successful

292-1

Responses for Document 00292

00292-001: Although 45 days is understandably a short time to review a document of this size, the time period is consistent with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act regarding the review of draft environmental impact statements. Significant effort was made to advise people of the schedule and duration of the review well in advance (one year). The DEIS was published on schedule and many substantive comments on the content of the DEIS, including yours, were received during the 45-day period.

While comments on the DEIS had to be received by the end of the 45-day comment period in order to be addressed in the Final EIS, additional provisions for involvement in the decision-making process apply to Tribal governments and Native organizations. The process of government-to-government consultation allows these groups to continue dialogue with the Bureau of Land Management.

00293

From: "Jerry Prioste" <10nizne1@cox.net>
To: <ADNR_Administrative_Record@jpo.doi.gov>
Date: 8/14/2002 1:33 PM
Subject: Alaska Wilderness

Please protect and preserve the remaining undisturbed and undeveloped areas in Alaska.

293-1

Jerry Prioste
11614 N 68th Pl.
Scottsdale, AZ 85254

Responses for Document 00293

00293-001: Thank you for your comment.

From: JANE RALLS" <janeralls@msn.com>
To: <ADNR_Administrative_Records@jpo.del.gov>
Date: 5/13/2002 3:20 PM
Subject: Trans-Alaska Pipeline

I am against re authorizing the Trans Alaska Pipeline.

Jane Ralls
515 E Grant St. #404
Minneapolis, MN 55404-1495

janeralls@msn.com

294-1

Responses for Document 00294

00294-001: Thank you for your comment.

From: "fssh@uaf.alaska.edu" <fssh@aurora.alaska.edu>
To: <adnr_administrative_record@jpo.doi.gov>
Date: 8/20/2002 12:39 PM
Subject: Alaska pipeline

Please extend the current 45-day comment period regarding the request by the owners of the trans-Alaska oil pipeline for a 30-year renewal of the pipeline's rights of way. The present comment period does not give sufficient time for concerned citizens to study the request in detail so they can participate in the public process in an informed and meaningful way. That participation is vital considering what is at stake if the now aging pipeline fails to be maintained to the standards required for its safe operation. Thank you for giving time and thought to our request.

295-1

Sallie Hogg
Norman Hogg
P.O. Box 212575
Anchorage, AK 99521-2595

Responses for Document 00295

00295-001: Although 45 days is understandably a short time to review a document of this size, the time period is consistent with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act regarding the review of draft environmental impact statements. Significant effort was made to advise people of the schedule and duration of the review well in advance (one year). The DEIS was published on schedule and many substantive comments on the content of the DEIS, including yours, were received during the 45-day period.

From: "wjenkins" <waj101032@hotmail.com>
To: <ADNR_Administrative_Record@jpo.doi.gov>
Date: 8/20/2002 10:03 AM
Subject: Oversight

Additional oversight is not needed at this as as per GAO and the record of the pipeline. This is just another example of the environmentalist lobby to justify their existence by continued legal actions. The additional oversight would only add to the cost without any additional safety! Thank you Dr Wayne A. Jenkins, Bx 2608, Sitka AK 99835

296-1

Responses for Document 00296

00296-001: The reader is referred to Section 2.5 of the FEIS, "Alternatives and Issues Considered but Eliminated from Detailed Analysis."

From: Evan WW Craig <auk@interaccess.com>
To: <ADNR_Administrative_Record@jpo.doi.gov>
Date: 5/13/2002 5:48 PM
Subject: Trans-Alaska Pipeline Agreement
CC: Evan Craig <auk@interaccess.com>

I oppose renewal of this agreement without a phase-out commitment to be carried out over the next ten years. Global Warming is already softening the tundra that supports this pipeline, and the oil it carries can only make this problem worse.

297-1

297-2

In addition, this pipeline crosses 800 miles from Alaska's North Slope, where the oil industry pollutes a sensitive environment, to the port of Valdez, where tankers play roulette with marine ecosystems. It crosses public land for almost the whole journey, crossing 80 rivers and streams, three mountain ranges, and some of Alaska's most spectacular locations.

If the pipeline is re-authorized, the highest possible environmental standards should be enforced.

This includes:

- * An independent environmental review conducted by the BLM and the State of Alaska, with the authority to require repairs and environmental safeguards.
- * Additional periodic reviews should be mandatory, with the authority to require additional repairs and safeguards.
- * Citizen advisory councils, representing local people and interests, should be given a formal oversight role.

297-3

297-4

These are the public's lands, and the pipeline operators must be good stewards of them to deserve our support.

Evan Craig
Chair, Woods & Wetlands Group of Sierra Club
<http://al.no-sierracub.org/w&w>
847-680-6437
... Work to Live, Live to Ride, Ride to Work!

Responses for Document 00297

- 00297-001:** Please see Section 4.3.2 in the EIS for a discussion on soils and permafrost related to the TAPS.
- 00297-002:** The importance of continued surveillance, monitoring, and appropriate response planning are critical issues for maintaining the quality of water resources crossed by the TAPS pipeline. JPO oversight of these procedures ensures that the highest standards of environmental protection will continue during the next 30 years of pipeline operations.
- 00297-003:** The reader is referred to Section 2.5 of the FEIS, in which audits are addressed under Alternatives and Issues Considered but Eliminated from Detailed Analysis.
- 00297-004:** The reader is referred to Section 2.5 of the FEIS, "Alternatives and Issues Considered but Eliminated from Detailed Analysis."

From: "Bill H. Grimm" <bhgwnter@hotmail.com>
To: <ADNR_Administrative_Record@jpo.doi.gov>
Date: 8/14/2002 9:44 AM
Subject: Alaskan Pipeline...

Thank you for your efforts over the past years...NOW is the time to renew our efforts to keep the strictest standards of protection so that we have a HEALTHY BALANCE between economic need and environmental beauty, and this balance can be attained for the benefit of all of us and our children and their families.

Alaska is a SPECIAL PLACE, both to people who live there and also in the hearts and minds of people who hope to come there some day...it is imperative to PROTECT OUR FUTURE BY SETTING REAL RULES TODAY!

ASK YOURSELF...IS THIS WHAT I WANT FOR MY CHILDREN, THEN DECIDE.

Thank you, and have a great day...

Sincerely,

Bill H. Grimm
Mesa, Arizona

MSN Photos is the easiest way to share and print your photos:
<http://photos.msn.com/support/worldwide.aspx>

298-1

Responses for Document 00298

00298-001: Thank you for your comment.

From: david lynn grimes <corinpcrow@cartalink.net>
To: <tapswebmaster@anl.gov>, <ADNR_Administrative_Record@jpo.doi.gov>
Date: 8/20/2002 1:01 PM
Subject: TAPS RENEWAL

August 20, 2002

BLM TAPS Renewal EIS
 Argonne National Lab EAD-900
 9700 S. Cass Ave.
 Argonne, IL 60439
 tapswebmaster@anl.gov

State of Alaska, DNR/JPO
 Attn: TAPS Renewal Team
 411 West 4th Ave., Suite 2C
 Anchorage, AK 99501
 ADNR_Administrative_Record@jpo.doi.gov

Re: Comments on Application of the Trans-Alaska Pipeline System Owners for Renewal of the Federal Grant and State Lease for the TAPS Right-of-Way

My name is David Grimes and I've lived in Cordova since 1977. I have been a commercial fisherman and wilderness guide in the Exxon Oil Spill region for 25 years. The Copper River and Prince William Sound are important to me spiritually, economically and for subsistence.

The Exxon Oil Spill was a great crisis, and the defining moment in my life. In the 13 years since, I have worked to protect and restore the oil spill region, not just for myself and my community, but because Prince William Sound and the Copper River and Delta are ecosystems of global value and significance.

Napoleon is said to have once stated that "History is a set of lies agreed upon." I and all citizens of the oil spill communities and all the animals killed and injured by the oil spill are disrespected and offended by the following statement in the draft EIS. "While the *Exxon Valdez* oil spill was a significant event in the operation of TAPS, creating significant benefits to the state and local economy that more than offset the economic damage to the fishing and tourism industries in Prince William Sound, it is unlikely that a spill of such magnitude, even if it occurred again would create the same level of economic activity" (DIEIS, page 4-7-116). **The oil spill was a great tragedy and to paint it as an economic boon to Alaska is to say that events of 9-11 in New York City will create lots of great jobs in the economy of reconstruction.**

299-1

Primary improvements in TAPS after the oil spill have come about because of the lessons we learned from this tragedy and from citizen oversight of oil shipping in Prince William Sound. The current pipeline is old and in danger of catastrophic failure. Any renewal of the pipeline lease MUST include citizen oversight of pipeline operations, similar to public oversight of tanker operations.

299-2

The pipeline crosses most of Alaska's major rivers in its 800 miles from Prudhoe Bay to Prince William Sound. In its last 150 miles the pipeline crosses 76 tributaries of the Copper River--**there**

are two parallel rivers out there, one of salmon and one of oil. Through citizen oversight of the pipeline we can do our best to help prevent the aging pipeline from spilling oil into the precious Copper River and harming the world-renowned Copper River wild salmon runs.

Government and industry have promised the people of Alaska and the United States safe best-available-technology pipeline operations. **Many former promises have been broken.** For current promises to be trusted, it is essential to have citizen oversight of all aspects of pipeline operations and oil transport. Anything less is simply a sham and a sign that greed rather than commonsense and respect runs our government.

I appreciate this opportunity to comment on TAPS renewal. **I can only support TAPS reauthorization for another 30 years if my recommendations are honestly addressed and included in the next federal grant and state lease.**

Sincerely,

David Grimes
PO BOX 1636
CORDOVA, AK 99574

299-2
(Cont.)

Responses for Document 00299

- 00299-001:** Text has been added to Section 4.7.8.3 of the FEIS providing additional sources of information about the impact of the Exxon Valdez oil spill (EVOS) on communities, including intangible impacts, such as psychological stress, and in the fisheries, recreation, and tourism industries in the Prince William Sound area. In addition, compressed overviews of selected impacts of the EVOS have been added to Sections 4.7.8.1 and 4.7.8.2.
- 00299-002:** The reader is directed to Section 2.5 of the FEIS and the text that discusses citizen oversight of TAPS.

From: "Lou Brown and Jon Miller" <loubrown@gc.net>
To: <ADNR_Administrative_Record@jpo.doi.gov>
Date: 8/16/2002 1:02 AM
Subject: TAPS Renewal comments

State of Alaska DNR/APO
Attn: TAPS Renewal Team
411 West 4th Ave., Suite 2C
Anchorage, AK 99501

August 15, 2002

Dear Sir or Madam,

I appreciate the opportunity to provide comment on the re-authorization of the Trans-Alaska Pipeline Grant and Lease.

My principle concern with the aging pipeline is the damage to the structure that will be caused by the effects of global warming. Needless to say, the pipeline's designers went to great lengths to ensure that the permafrost which underlies much of the pipeline would remain undisturbed and unimpaired. Global warming may pose the most significant threat to the pipeline ever, since melting beneath the vertical supports has potential to be very widespread and a constant source of cracks and breaks in the line. The renewal should ascertain if a credible plan has been made by the pipeline's owners and managers to address this issue.

300-1

I also feel that, given the age of the pipeline, the maintenance schedule will have to be significantly stepped up. I urge you to ensure that an aggressive preventative maintenance program is built into the grant lease.

300-2

Today, the public's interests are often guarded by citizen's oversight groups. Given the importance of the pipeline to Alaska's economy and the potential for damage to public lands in the case of a significant spill, the grant lease should establish a such a citizen group to protect the public interest.

300-3

When Congress authorized construction of the Dalton Highway and the infrastructure of the TAPS, it was with the understanding that, at some point, the land would be rehabilitated and returned to its previous state. I would like to know that funds for this massively expensive project will be set aside now to ensure that dismantling, removal and restoration work can be immediately undertaken and completed in a timely manner when the North Slope is abandoned. I urge you to make the creation of such a fund a condition of the renewal.

300-4

I believe it is in DNR's and the public's interest to learn exactly what condition the pipeline is actually in. I think the new grant and lease should not be awarded until DNR is satisfied that no significant problems exist. This information should be gathered by an independent agent who should also review policies and procedures of the operation to ensure that emergency contingency plans are in place and that all aspects of pipeline operation assure the protection of people, land and animals. I also think that, again, given the age of the pipeline, such a review would be in order at least every five years.

300-5

TAPS employees know best where potential problems lie. It is critical that employees who see problems that could lead to oil spills be free to bring their concerns to management without fear. Likewise, "whistle-blowers" should be protected and appropriate language in the new grant and lease will help ensure that conscientious employees do not suffer reprisals from management for actions that may help reduce the number of spills.

300-6

Of course, DNR should require the application of any new advances that have been made in the technology of the petroleum industry. Moreover, any new scientific data should be incorporated into the management plan to ensure the highest level of protection for people, land and animals.

300-7

Finally, I feel that the opportunity for the public to comment on this critical document is much too short. I feel that an extension of at least two months would be very appropriate so that the lay population will have time to learn about the issues and make their concerns known to you.

300-8

I appreciate the time you have taken to consider my thoughts on this important issue.

Sincerely,

Lou Brown

2630 Home Run

Fairbanks, AK 99706

Responses for Document 00300

- 00300-001:** VSM stability is obviously critical to TAPS integrity. As such, it is the focus of extensive monitoring and surveillance. Please see Section 4.3.2 of the FEIS (Soils and Permafrost) for additional information.
- 00300-002:** The BLM and member agencies of the JPO use an adaptive management approach to evaluate the effectiveness of stipulations and regulatory oversight. Ongoing monitoring programs, as identified in the 12 Comprehensive Monitoring Reports published since 1996, provide BLM and JPO with the necessary information to evaluate the effectiveness of stipulations in the Grant and Lease.
- The reader is referred to Section 4.1.1 (JPO oversight) and specifically to Sections 4.1.1.2 (Adaptive Nature of the Grant in Compliance Monitoring), 4.1.1.3 (Risk-based Compliance Monitoring), 4.1.1.4 (JPO Comprehensive Monitoring Program), and 4.1.1.8 (Coordinated Planning and Response to Abnormal Incidents) for more information on the role of adaptive management as a JPO business practice.
- 00300-003:** The reader is referred to Section 2.5 of the FEIS, "Alternatives and Issues Considered but Eliminated from Detailed Analysis."
- 00300-004:** The reader is directed to the discussion of escrow funds found in Section 2.5.
- 00300-005:** The reader is referred to Section 2.5 of the FEIS, in which audits are addressed under Alternatives and Issues Considered but Eliminated from Detailed Analysis.
- 00300-006:** The BLM and the agencies within JPO acknowledge both that there have been legitimate issues related to APSC's Employee Concerns Program (ECP) and that APSC has undertaken considerable efforts to improve and refine its ECP program.
- The BLM and JPO expect to continue to evaluate the effectiveness of APSC's ECP through confidential surveys that will seek input from all TAPS employees (see Section 4.8.4 of the FEIS). Like the three prior surveys, these efforts can provide broad measures of the confidence that TAPS workers have in APSC's ECP and can suggest areas needing improvement.
- The JPO also notes that a confidential hotline (1-800-764-5070) currently exists for employees or members of the public to report issues and concerns about TAPS. Recorded messages are checked daily by the BLM-Alaska Special Agent's office. The purpose of the hotline is to identify issues relating to pipeline integrity, public safety, environmental protections and regulatory compliance for incorporation into the JPO work program. The BLM also refers employees seeking personal relief (e.g., restoration of employment or lost compensation) to the U.S. Department of Labor or other appropriate authorities for further investigation.
- 00300-007:** The BLM and member agencies of the JPO use an adaptive management approach to evaluate the effectiveness of stipulations and regulatory oversight. Ongoing monitoring programs, as identified in the 12 Comprehensive Monitoring Reports published since 1996, provide BLM and JPO with the necessary information to evaluate the effectiveness of stipulations in the Grant and Lease.
- The reader is referred to Section 4.1.1 (JPO oversight) and specifically to Sections 4.1.1.2 (Adaptive Nature of the Grant in Compliance Monitoring), 4.1.1.3 (Risk-based Compliance Monitoring), 4.1.1.4 (JPO Comprehensive Monitoring Program), and 4.1.1.8 (Coordinated Planning and Response to Abnormal Incidents) for more information on the role of adaptive management as a JPO business practice.

00300-008: Although 45 days is understandably a short time to review a document of this size, the time period is consistent with the Council on Environmental Quality regulations for implementing the National Environmental Policy Act regarding the review of draft environmental impact statements. Significant effort was made to advise people of the schedule and duration of the review well in advance (one year). The DEIS was published on schedule and many substantive comments on the content of the DEIS, including yours, were received during the 45-day period.