

Status keys	Closed	Item identified in a past report from the Federal Coordinator's office, but later resolved and not a concern at this time.
	Monitoring	Item that the Federal Coordinator's office will continue to monitor but, with continued coordination, is not likely to affect the project negatively.
	Priority	Item requires attention and has a moderate likelihood of affecting the project negatively.
	Critical path	Item with high potential to affect the project negatively if action is not taken.

Issue: <i>Air Quality/Non-Attainment/ Greenhouse Gas Emissions</i>			Point of contact: Heather Ptak
<p>Air quality remains a large area of concern for the project, with significant federal regulatory changes proposed. Federal air quality regulations continue to change and will likely remain a dynamic issue nationwide throughout the permitting of this project. Several proposed changes include the tailoring rule (requiring large emitters to use best-available control technology to reduce greenhouse gas emissions) that went into effect in January 2011; more stringent sulfur oxide and nitrogen oxide emission requirements; emission limitations for construction equipment; and the potential to revise air quality regulations specifically affecting the oil and natural gas industry (draft regulations are anticipated in fall 2011). The effects of potential, proposed and new regulations on the Alaska gas pipeline project continue to be assessed.</p>			
Date	Status	Notes	Additional Information (if available)
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
February 2011	Priority	The Environmental Protection Agency has determined that Fairbanks is a non-attainment area for particulate matter in the air, and a general conformity analysis of the project's affect on Fairbanks will need to be conducted.	Attention Item Update (February 2011)
August 2011	Priority	Air quality data has not been collected at the proposed gas treatment plant location at Prudhoe Bay or at any of the proposed compressor station locations along the pipeline route. This information will be needed for National Environmental Policy Act analysis and/or permitting. Additionally, the EPA in August 2011 issued draft proposed amendments to air-quality regulations for the oil and natural gas industry.	

Issue: <i>Bald and Golden Eagle Protection Act</i>			Point of contact: Julie McKim
<p>No purposeful killings of eagles will be authorized under the act; however, regulations under the act may permit other forms of take, such as disturbing eagles or destruction of inactive nests. Project applicants will be required to avoid and minimize the potential for take. It will be necessary to perform eagle surveys along the pipeline route and in areas of support facilities to identify the location of nests and to determine if management practices can be implemented to avoid a take. An applicant should engage the U.S. Fish and Wildlife Service regarding this issue and identifying data collection needs and future mitigation options, as this issue could influence pipeline routing considerations. Coordination with the service regarding this issue is a separate process from Section 7 consultation under the Endangered Species Act.</p>			
Date	Status	Notes	Additional Information (if available)
February 2011	Priority	Issue was first identified and reported in the Federal Coordinator's February Attention Items Update for the pipeline project.	Attention Item Update (February 2011)
August 2011	Priority	The project applicant does not plan to conduct raptor surveys until closer to actual permitting and is currently reviewing existing literature. The U.S. Fish and Wildlife Service will consider the applicant's literature review to ensure that adequate information will be submitted with the FERC application. It is possible that there may be gaps within the existing data that will require actual surveys before submittal of the FERC application. (The project applicant plans to complete new surveys along the route before pipeline construction to provide current information in its permit application to the U.S. Fish and Wildlife Service.) This issue remains a priority as the U.S. Fish and Wildlife Service may identify data gaps following the literature review that will need to be filled in spring 2012.	

Issue: <i>Bridges</i>			Point of contact: Julie McKim
<p>The U.S. Coast Guard has identified 79 potential major waterways that require navigability determinations in order to decide its jurisdiction associated with permitting activities under the General Bridge Act of 1946, as amended, for the pipeline. U.S. Coast Guard approvals will be required for crossings of all navigable waters under the act. These determinations will require data collection, and staffing resources could be a constraint.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Monitoring	As of October 1, 2010, the U.S. Coast Guard had compiled and/or collected sufficient data for all 79 waterways. Data analysis and processing is an ongoing activity that should be completed by June 2011.	Attention Item Update (February 2011)
August 2011	Monitoring	No change in status. Data and analysis should be ready for agency distribution in September 2011	

Issue: <i>Climate Change</i>			Point of contact: Julie McKim
<p>The Council on Environmental Quality in February 2010 released draft guidance with respect to the role of greenhouse gas emissions and climate change in federal agency decisions. The draft guidance suggests ways in which federal agencies can strengthen their consideration of the effects of greenhouse gas emissions and climate change in evaluating proposals for federal actions under the National Environmental Policy Act. The council proposes to advise federal agencies to consider, in scoping their NEPA analyses, whether analysis of direct and indirect emissions from proposed actions would provide meaningful information to decision makers and the public. The comment period for this draft guidance ended in May 2010; however, the council has yet to issue its final guidance. In addition, the Interagency Climate Change Adaptation Task Force submitted a progress report to the White House on October 5, 2010, summarizing recommended actions for the federal government to take to address climate change issues. It is uncertain if or when the recommendations from the council or the task force will be put forth as final guidance.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
February 2011	Priority	With the lack of federal guidance, it is not clear to what extent climate change needs to be addressed in the project's EIS or to what extent the project applicant needs to collect data to support this analysis. The issue remains a priority.	Attention Item Update (February 2011)
August 2011	Priority	No change in status since the last update. The Council on Environmental Quality has not published its final guidance on the issues.	

Issue: Coastal Zone Management (Currently not applicable, see August 2011 update)			Point of contact: Julie McKim
<p>The state of Alaska had a federally approved coastal management program, but the program ended July 1, 2011. The program's jurisdiction included activities occurring within the North Slope Borough District, and required completion of a coastal project questionnaire by the applicant. The questionnaire process allowed for a multidisciplinary review of components within coastal districts. The review was coordinated by the Alaska program office and state Division of Coastal and Ocean Management. The management office would determine whether the proposed project was consistent with the state's coastal management policies.</p>			
Date	Status	Notes	Additional Information (if available)
February 2011	Monitoring	State and federal agency coordination is required; however, the process should not result in delays in the project permitting.	Attention Item Update (February 2011)
August 2011	Monitoring	The Alaska Coastal Management Program expired July 1, 2011, lacking state legislative approval of its renewal. Unless Alaska reinstates its coastal zone management program, the Coastal Zone Management Act consistency provision will no longer apply in the state. Therefore, this issue is currently not relevant to the project. The Federal Coordinator's office will monitor that status of the program in Alaska.	

Issue: Contaminated Sites			Point of contact: Heather Ptak
<p>A contaminated site is an area affected by petroleum products or other hazardous substance releases. Contamination can be found on lands due to activities conducted at that site or through migration of the contaminants from other sources. Every contaminated site along the project route and near associated facilities should be identified early to ensure they are properly addressed in the project's environmental impact statement and do not cause a delay for permitting or construction activities.</p>			
Date	Status	Notes	Additional Information (if available)
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
February 2011	Critical path	In addition to contaminated sites along the line in general, additional permitting complications could arise if unexpected contamination is encountered on military bases. If the pipeline route crosses unanticipated contaminated sites on military bases, the full Comprehensive Environmental Response, Compensation and Liability Act process could be required. This process could add years to the schedule before construction could begin. Coordination with EPA, Alaska Department of Environmental Conservation, the military bases and the project applicant is critical to address unknown contamination encountered during construction and to determine the level of investigation that should be conducted prior to construction.	Attention Item Update (February 2011)
August 2011	Critical path	The project applicant is conducting a literature review to determine known contamination along the potential pipeline route. Additionally, the applicant has begun working with Eielson Air Force Base and Fort Wainwright on routing considerations. However, it is still unknown if contaminated sites will be encountered on military bases. The item remains a critical-path item due to the prevalence of contamination historically identified on both Fort Wainwright and Eielson and the potential delay to the project if it encounters contaminated sites. The applicant needs to explain to Alaska land managers on the military bases how this issue has been handled for other pipeline projects around the country.	

Issue: Cultural Resources/ Prehistoric and Historic Properties			Point of contact: Heather Ptak
<p>Identification of cultural resources along the pipeline route will be critical for routing and construction activities. FERC is the lead agency for purposes of Section 106 of the National Historic Preservation Act and has initiated consultation with the Alaska State Historic Preservation Office. FERC will coordinate development of a programmatic agreement, if necessary, to document topics such as the Section 106 review process, approved field survey protocols and an unanticipated-discovery plan. This document requires coordination between agencies, the applicant and outside stakeholders, and it can be a time-consuming process. It is critical that the development of a programmatic agreement be initiated early enough to gain consensus between all parties.</p>			
Date	Status	Notes	Additional Information (if available)
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
February 2011	Priority	The project applicant has begun field surveys; however, confirmation that survey protocols were reviewed and approved by the state office is pending.	Attention Item Update (February 2011)
August 2011	Priority	The project applicant continues to collect cultural resource data; however, the area of potential effect has not been defined with the agencies. Additional coordination with the agencies regarding when they will receive survey data is recommended. Meanwhile, the applicant has petitioned FERC to write a programmatic agreement for this project; it can be a long lead time item for such an agreement.	

Issue: Data Collection and Field Season Plans			Point of contact: Heather Ptak
<p>The applicant published a data gap analysis and field sampling plan April 2, 2010, outlining the project's data needs and a timeline for collecting the data. Very little information has been shared with federal agencies since that date regarding specific details on the data collected and the data still to be collected for the FERC filing in October 2012. APP says it is on schedule for collecting sufficient data for the FERC application, the National Environmental Policy Act analysis and agency authorizations, but the applicant needs to share the information in detail with the agencies for verification.</p>			
Date	Status	Notes	Additional Information (if available)
August 2011	Critical path	Issue highlighted in the Federal Coordinator's Attention Item Update. The applicant has agreed to work with the Federal Coordinator's office to put together meetings with individual federal agencies in Alaska in September to share more detailed permit-related information in an effort to resolve these issues.	Attention Item Update (August 2011)

Issue: <i>Efficient Use of Government Resources</i>			Point of contact: Jenn Thompson
Some federal agencies are authorized to enter into cost-recovery and/or reimbursable-service agreements with public and private entities while others are not. Agencies are conducting thorough examinations of their budgetary needs for regulatory work on the project as well as their options for cost reimbursement.			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Monitoring	Agencies have begun entering into cost-reimbursable service agreements.	Attention Item Update (February 2011)
August 2011	Monitoring	No change since the last update. The Federal Coordinator's office will continue to engage the agencies to identify potential resource/budgetary constraints that could affect the project.	

Issue: <i>Emergency Response Plan</i>			Point of contact: Frank Richards
The oil and gas industry's emergency response capabilities are under increasing federal and public scrutiny following the April 2010 deep-water drilling rig disaster in the Gulf of Mexico. Although this project does not include any offshore development, the capability of response teams in Alaska's Beaufort and Chukchi seas is of concern, especially to Native organizations and local governments in the region. It is uncertain whether changes in regulatory requirements would affect this project.			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Monitoring	Issue first identified and reported in the February 2011 Attention Items Update.	Attention Item Update (February 2011)
August 2011	Monitoring	No status change since the last update. To date there have not been any additional emergency response requirements enacted that would be applicable to this project. The Federal Coordinator's office will continue to monitor this issue.	

Issue: <i>Fish Habitat</i>			Point of contact: Julie McKim
<p>Fish habitat is protected by two different agencies (the National Marine Fisheries Service (NMFS) and Alaska Department of Fish and Game), depending on the location and type of the habitat. Essential fish habitat, as defined in the Magnuson-Stevens Fishery Conservation and Management Act, requires NMFS to coordinate with and provide information to other federal agencies regarding the conservation and enhancement of essential fish habitat, which has been identified for several federally managed species along the project route. Based on the current project information, NMFS has identified essential fish habitat encompassing streams that support salmon runs. If the lead federal agency (FERC) determines that an action will adversely impact essential fish habitat, an assessment and consultation with NMFS is required.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Monitoring	Data was collected in 2010 based on a protocol developed with assistance of the Alaska Department of Fish and Game. Over 300 streams were surveyed for types of fish present, habitat and water-quality parameters.	Attention Item Update (February 2011)
August 2011	Monitoring	During the 2010/2011 winter season, studies were conducted in lakes likely to provide overwintering fish habitat. Subsequently, the project applicant met with National Marine Fisheries Service and Alaska Department of Fish and Game to discuss its proposed 2011 field programs. Additional lake and stream surveys are planned to occur during the 2011 field season.	

Issue: <i>Floodplains</i>			Point of contact: Julie McKim
<p>Floodplains are addressed in Executive Order 11988, in which federal agencies are required to avoid adverse impacts to floodplains and/or limit authorizations to develop in these areas to the extent practical. After the project applicant shares its preferred pipeline route with federal agencies, the agencies will evaluate the routing in relation to floodplain potential. As part of its evaluation of the project's effects, FERC will seek to avoid the placement of aboveground facilities in designated floodplains.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Monitoring	Data is being collected to support this analysis. Floodplain considerations are being taken into account during routing of the pipeline.	Attention Item Update (February 2011)
August 2011	Monitoring	The U.S. Pipeline and Hazardous Materials Safety Administration issued an advisory bulletin on July 27, 2011, alerting owners and operators of gas pipelines of the dangers of severe flooding on pipeline routes. Although the bulletin is geared toward existing pipelines, PHMSA describes actions to prevent and mitigate damage to pipeline facilities and ensure public and environmental safety in areas affected by flooding, which could be helpful to the applicant during project design.	PHMSA advisory bulletin

Issue: <i>Geological Studies</i>			Point of contact: Frank Richards
<p>Geological concerns such as active faults, earthquake ground movement/motion, subsidence and landslides are prevalent along the proposed line. In June 2010, Canadian and U.S. personnel met in Whitehorse, Yukon Territory, to review geological studies along the pipeline route and identify concerns of different agencies. Coordination and communication between these groups continues. In general, consensus is needed between the project applicant and agencies, particularly between the U.S. Geological Survey, Pipeline and Hazardous Materials Safety Administration, FERC and the Alaska Division of Geological & Geophysical Surveys, over the location of the geohazard areas and the appropriate construction practices (including mitigation measures) that will be allowed in these areas.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
February 2011	Critical path	Construction techniques and required mitigation are currently unknown. Data sharing among agencies will be critical. (This issue was inadvertently classified as Critical path in the February update when it should have remained a priority issue.)	Attention Item Update (February 2011)
August 2011	Priority	The status of this item has been downgraded as the project applicant is working with applicable agencies regarding these hazards and is actively collecting data to address concerns.	

Issue: <i>Government-to-Government Consultation</i>			Point of contact: Heather Ptak
<p>Government-to-government consultations with federally recognized tribal governments are an essential component of effective federal agency decision making. FERC, as the lead agency for the National Environmental Policy Act process, will coordinate the government-to-government consultations for the project. Many agencies are required to perform such consultations before issuing authorizations and permits. All agencies with a government-to-government requirement have agreed to coordinate with FERC on all government-to-government consultations for this project. Coordination between federal agencies will be critical to ensure that each agency's requirements for consultation have been met and meaningful involvement with the tribes is achieved.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
April 2010	Priority	FERC sent all federal cooperating agencies a draft of its Alaska Native Consultation Plan.	
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
July 2010	Priority	FERC sent a letter to all the federally recognized tribes in the state, providing project updates and information regarding NEPA, Section 106 of the National Historic Preservation Act and government-to-government consultation processes	FERC letter
February 2011	Monitoring	The status of this issue has been downgraded as FERC is working with federal agencies on the government-to-government consultation process and has begun engaging tribal governments.	Attention Item Update (February 2011)
June 2011	Monitoring	FERC sent a letter to federally recognized tribes to gauge the level of involvement they would like to have in the project.	FERC letter
August 2011	Monitoring	No change since the last update. This is currently not a concern, as FERC continues to engage the tribes.	

Issue: <i>Human Health</i>			Point of contact: Julie McKim
<p>Evaluation of human health impacts from development projects is gaining increasing concern across Alaska. Several large-scale projects in the state have received comments from stakeholders that potential human health impacts are a major concern. Therefore, it is likely that human health impacts will need to be addressed in the National Environmental Policy Act process for this project.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
February 2011	Priority	Federal guidance does not currently exist. The state of Alaska is working on preparing guidance; however, how this is incorporated into the National Environmental Policy Act analysis still needs to be determined.	
August 2011	Priority	The project applicant has been working with the state of Alaska to collect the data necessary to conduct this assessment, and FERC intends to evaluate these potential impacts in the environmental impact statement.	

Issue: <i>Infrastructure Projects and Challenges</i>			Point of contact: Frank Richards
<p>Infrastructure needs must be continuously addressed in order to expeditiously construct the project. All necessary support systems must be in place before construction can begin; inadequate road, port or railroad conditions could slow down construction and increase costs. Based on the current permitting and construction timelines, there are limited construction seasons until the gas pipeline construction is scheduled to commence. Necessary infrastructure projects include upgrading bridges, highways, material sites and maintenance camps. Infrastructure routes can be categorized in two ways: (1) The route parallel to the pipeline; and (2) Logistical routes that may move freight, pipe, people and modules to construction areas.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Monitoring	The applicant has been working with the Alaska Department of Transportation and Public Facilities and is confident it can conduct the project with the existing infrastructure, with the exception of West Dock at Prudhoe Bay, which will require modification for the large-volume sea lifts of modules.	Attention Item Update (February 2011)
August 2011	Monitoring	APP described a need for material sites, camps and upgrades to West Dock near the gas treatment plant in its preliminary draft Resource Report No. 1, submitted to FERC in April 2011. Once the project applicant shares its pipeline and transportation logistics plans with agencies, additional analysis by the state Transportation Department and the applicant will likely be performed to ensure that ports, airports and harbors have sufficient capacity to handle the freight load.	Preliminary draft Resource Reports Nos. 1 and 10

Issue: <i>Landowner and Land Access Issues</i>			Point of contact: Heather Ptak
<p>Until the exact route of the pipeline is determined, a full analysis of landowner and access issues cannot be completed. In general, Native allotments, Native land conveyances, mining claims, military bases, private land and conservation system units (e.g., wildlife refuges, wild and scenic rivers) are the landowner issues of potential concern. If the pipeline will cross Native allotments that have been conveyed, the Bureau of Indian Affairs has trust responsibilities and has to approve the right-of-way. This process can take a significant amount of time (approximately one to two years), especially if there are multiple owners. Therefore, early coordination with the bureau will be critical. Also, access to military bases, mining claims and private land for field studies or pipeline routing can be difficult to coordinate. If any portion of the pipeline will cross a conservation system unit, Title XI under the Alaska National Interest Lands Conservation Act may impose additional requirements on FERC, the Bureau of Land Management or other agencies. Continued coordination and analysis of this issue will be required if a pipeline is routed through a conservation system unit or crosses a wild and scenic river.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Priority	Issue first identified and reported in February 2011 Attention Items Update.	Attention Item Update (February 2011)
August 2011	Critical path	The project applicant's current route map filed with FERC shows the pipeline crossing the Tetlin National Wildlife Refuge to reach the Canadian border, which would require the applicant and federal agencies to follow the provisions of Title XI of the Alaska National Interest Lands Conservation Act. The applicant has determined that the multi-agency approval process required by ANILCA is too complex and conflicts with APP's permitting plan for the project, and therefore is pursuing other options for either staying with the proposed pipeline route or an alternative to reaching the pipeline connection point at the border with Canada. Because this decision could change permitting requirements and timelines for the project, the status has been updated to critical path.	Attention Item Update (August 2011)

Issue: <i>Native Land Conveyances</i>			Point of contact: Heather Ptak
<p>Currently, there are 28 pending Alaska Native or Alaska Native veteran allotment applications for property near the proposed gas pipeline route. Some of these applications encompass land conveyed to the state by the Bureau of Land Management prior to the bureau receiving the allotment application. The bureau must determine that these allotment applications are valid before requesting that the state reconvey the land back to the federal government for transfer to the allotment applicants. When the state is asked to voluntarily reconvey land in such cases, it must make a best-interest determination that includes agency review and public notice. Once it is determined to be in the state's best interest to reconvey the land, the land is quitclaimed to the Bureau of Land Management. In the particular cases near the proposed pipeline route, a best-interest determination cannot be made at this time as the location of the pipeline is uncertain. Until the route is determined, the state cannot proceed with the necessary best-interest findings. Allotments not on state land near the pipeline route are in various stages of processing for conveyance and the bureau continues to adjudicate those applications accordingly.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
February 2011	Critical path	The project applicant is optimizing the proposed pipeline routes and intends to avoid Native allotments to the extent possible.	Attention Item Update (February 2011)
August 2011	Priority	This issue has been downgraded as a right-of-way through these properties could proceed, as the state of Alaska currently holds the title to the land. This issue will likely not impact the project itself, but lack of resolution on the pending conveyances is of local concern.	

Issue: <i>Ocean Dumping of Dredged Material</i>			Point of contact: Julie McKim
<p>The modules constructed for the North Slope gas treatment plant will likely be larger and heavier than any modules previously brought into the existing dock facilities on the North Slope. The area's deepest docking facility is West Dock. To meet the needs of these larger modules, dredging may be required. The volume of material dredged to accommodate the modules may exceed the amount feasible to use for fill or other beneficial purposes, so the excess material may need to be disposed of in ocean waters. If the material is transported and dumped in ocean waters, the activity would be subject to the Marine Protection, Research and Sanctuaries Act under the jurisdiction of Environmental Protection Agency and/or U.S. Army Corps of Engineers and U.S. Coast Guard.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Critical path	The project applicant begins working with the Army Corps of Engineers and EPA regarding permitting strategy and data collection needs.	Attention Item Update (February 2011)
August 2011	Priority	In the applicant's April preliminary draft Resource Report No. 1, the project applicant noted that dredging will be required at West Dock. The applicant has begun data collection activities and has increased communication with regulatory agencies. The status of this item has been downgraded as work has been conducted to address the issue; however, it is uncertain if all of the required data for this issue will be available for the applicant's FERC filing in October 2012.	Attention Item Update (August 2011)

Issue: <i>Permitting Plan</i>			Point of contact: Julie McKim
<p>APP has indicated it will use a phased approach to permitting this project. This would consist of submitting data sufficient for the application to FERC and the FERC-led NEPA analysis in October 2012, and then submitting additional data needed for other federal reviews and approvals sometime later (such as permits required for actual construction). The applicant has committed to explaining its permit plan in detail to FERC and each individual federal agency later this summer and early fall. Those discussions are essential to ensure a complete project application is submitted to FERC and contains sufficient data for the environmental impact statement and NEPA analysis. The Federal Coordinator's office added this issue to its Attention Items Update over concerns that the applicant had not fully explained its permit plan.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
August 2011	Critical path	APP has acknowledged this issue and will meet with the agencies early this fall to discuss in detail its plan for data collection, data submission, and its permitting approach. This remains a critical-path item until the applicant, FERC and federal permitting agencies have met and reached consensus on how the applicant's permit plan will work for this project.	Attention Item Update (August 2011)

Issue: Pipeline and Hazardous Materials Safety Administration Special Permits			Point of contact: Frank Richards
<p>If the applicant proposes to construct the pipeline under different specifications than those specifically allowed in federal regulations (49 CFR 192), a special permit would be required by the U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration. Some parameters that could be different from those specified in the regulations include: spacing of crack arrestors, pressure testing, strain-based design, mainline valve spacing and depth of cover. Additionally, changing regulations regarding pipeline safety could impose additional requirements for consideration under a special permit. The pipeline agency's staff has said they will need at least 12 months to review the information submitted under a special-permit application and may require additional testing or data before a special permit could be issued. Project applicant communication with the pipeline agency and FERC must occur to ensure that the application submitted to FERC is complete regarding information needed for any such special permits and is adequately represented in the environmental impact statement.</p>			
Date	Status	Notes	Additional Information (if available)
March 2010	Priority	The pipeline agency sent a letter to the project applicant, outlining information required for a special permit application and National Environmental Policy Act review.	PHMSA letter
February 2011	Priority	PHMSA is still concerned about when information will be received and review timelines. APP has been meeting with PHMSA on a regular basis and continues to work with PHMSA on a data delivery plan.	Attention Item Update (February 2011)
March 2011	Priority	PHMSA sent a letter to APP, stating that the agency has determined that special-permit applications are needed for external load design, crack arrestor spacing and shielding coatings.	PHMSA letter
August 2011	Priority	APP and PHMSA met several times to discuss an information delivery plan to provide data to PHMSA for its special permits analysis. APP acknowledges that a special permit for strain-based design is necessary. This issue remains a priority as a request for a special permit and the associated data has not been delivered to PHMSA and the review is a long lead time item.	

Issue: Scope of Project Alternatives/Statement of Purpose and Need			Point of contact: Frank Richards
<p>The purpose and need developed for a project define the sideboards within which the National Environmental Policy Act analysis is conducted. Congress defined the purpose and need of the project in Section 103 of the Alaska Natural Gas Pipeline Act. This purpose and need will also be used to evaluate alternatives to the project in accordance with NEPA. The environmental impact statement will address each of the alternatives with a brief discussion explaining whether they are deemed reasonable or if they will be eliminated from further consideration. The analysis of each alternative will be commensurate with the associated impacts and will continue until a clear determination as to whether the alternative is environmentally preferable to the proposed action can be made.</p>			
Date	Status	Notes	Additional Information (if available)
March 2010	Priority	FERC provided the cooperating agencies with a draft Purpose and Need and Scope of Alternatives Statement in accordance with Section IV C (5) of the Memorandum of Understanding Related to an Alaska Natural Gas Transportation Project.	
May 2010	Priority	Issue highlighted in the Federal Coordinator's initial implementation plan for the pipeline project.	2010 Implementation Plan
February 2011	Monitoring	The status of this item has been changed to monitoring, as FERC is working with federal agencies on the purpose and need statement and the applicant is tracking route alternatives and working on developing project alternatives.	Attention Item Update (February 2011)
April 2011	Monitoring	The applicant submitted preliminary drafts of Resource Reports Nos. 1 and 10, outlining their purpose and need and project alternatives.	Preliminary draft Resource Reports Nos. 1 and 10
August 2011	Monitoring	Agencies commented on the purpose and need as defined by the applicant in the resource reports. FERC issued the notice of intent to prepare an environmental impact statement for the project.	Notice of intent

Issue: <i>Subsistence</i>			Point of contact: Heather Ptak
<p>Effects on subsistence along the pipeline route will be considered during the National Environmental Policy Act process. The environmental impact statement will evaluate the project's potential effects on subsistence in two ways: (1) The term refers to the Alaska Native way of living; and (2) The government definition that involves the use of and access to sources of wild foods. The Bureau of Land Management will use the environmental impact statement to prepare the required finding under the Alaska National Interest Lands Conservation Act on the project's potential to restrict subsistence activities. In order to evaluate effects to residents' subsistence way of life and resources, data will need to be collected along the length of the pipeline corridor. Although agencies have been collecting hunting and fishing data for several other energy projects in the state through the years, there has not been recent data gathered for all subsistence uses and needs in all of the communities along the gas line route.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Critical path	Issue first identified and reported in February 2011 Attention Items Update.	Attention Item Update (February 2011)
February 2011	Critical path	FERC issued a letter outlining detailed specifications for subsistence data to be included in the project application.	FERC letter
August 2011	Critical path	The applicant has contracted with the Alaska Department of Fish and Game to collect this data; however, not all of the communities will be surveyed in time for the FERC filing in October 2012.	Attention Item Update (August 2011)

Issue: <i>Threatened and Endangered Species</i>			Point of contact: Julie McKim
<p>There must be careful consideration and coordination of how the project may affect listed species. The current threatened and endangered species lists are subject to change. The Fish and Wildlife Service and the National Marine Fisheries Service share responsibilities for the Endangered Species Act. In all, there are 14 species and one plant listed for Alaska. In addition, consideration should be given to conservation of species on the candidate species list.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Priority	On November 24, 2010, the U.S. Fish and Wildlife Service designated critical habitat for the threatened polar bear, and on December 6, 2010, the National Marine Fisheries Service published notice of a public comment period ending February 8, 2011, for the listing of four subspecies of ringed seals found in the Arctic Basin and North Atlantic and two population segments of bearded seals in the Pacific Ocean as threatened.	Attention Item Update (February 2011)
August 2011	Priority	National Marine Fisheries Service extended the public comment period for the listing of the seals through March 25, 2011, and held public hearings within the state of Alaska, but a decision on listing has not yet been published.	

Issue: <i>Water Quality Certificate</i>			Point of contact: Julie McKim
<p>If an activity may involve a discharge of fill and/or dredged material into waters of the United States, requiring a Section 404 of the Clean Water Act permit from the U.S. Army Corps of Engineers (Corps), a water-quality certificate of reasonable assurance under Section 401 of the act must be obtained from the Alaska Department of Environmental Conservation before issuance of a Section 404 permit. Through the application and public notice process, the Department of Environmental Conservation will gather the information it needs to certify that the project will likely be able to meet Clean Water Act and state water-quality standards.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Monitoring	Coordination between the agencies when the Corps issues a public notice will be critical to ensure the review processes are concurrent and both agencies have adequate information for timely reviews.	Attention Item Update (February 2011)
August 2011	Monitoring	No change since the last update, but the issue is not a concern at this time as data is being collected by APP.	

Issue: <i>Wetlands</i>			Point of contact: Julie McKim
<p>A significant portion of the pipeline route will cross jurisdictional wetlands. The U.S. Army Corps of Engineers (Corps) will require complete maps from the applicant delineating waters of the United States, including wetlands, out to a specified pipeline corridor width. The Corps has approved a desktop study of aerial photography and existing information followed by field studies to verify results of the desktop work for input into the delineation maps. FERC requires complete field verification of wetlands and will also review the preliminary desktop protocol. Coordination with FERC, the Corps and EPA will be critical to ensure that sufficient data is collected to meet Clean Water Act Section 404 and FERC's National Environmental Policy Act requirements.</p>			
<i>Date</i>	<i>Status</i>	<i>Notes</i>	<i>Additional Information (if available)</i>
February 2011	Monitoring	Coordination between the Corps, EPA and FERC has occurred to establish field survey protocols and data required for Section 404 permitting and National Environmental Policy Act analysis. A procedure for validating the accuracy of the results generated without additional field verification has been proposed by FERC, but has not been adopted by the project applicant.	Attention Item Update (February 2011)
August 2011	Monitoring	APP has completed 2010 field activities and has been in communication with agencies regarding 2011 activities. The validation procedure has not yet been approved by FERC, but is anticipated to be approved prior to the end of the 2011 field season. This issue will continue to be monitored but it not seen as a priority currently.	