

## **Appendix A**

### **Agency Consultation Correspondence**



Oklahoma Archeological Survey  
THE UNIVERSITY OF OKLAHOMA

February 28, 2001

Bob Bonner  
Terracon  
10930 East 56<sup>th</sup> St.  
Tulsa, Oklahoma 74146

**RE:** Terracon proposed General Permit - 005A for storm water discharges; site. # 53017001. Legal Description: Part of the NE 1/4 Section 6 T20N R1 5E; Rogers County, Oklahoma

Dear Mr. Bonner:

The above referenced project has been reviewed by the Community Assistance Program staff of this agency to identify areas that may potentially contain prehistoric or **historic** archeological materials (**historic** properties). The location of your project has been cross-checked with the state site files containing approximately 14,000 archeological sites, **which are** currently recorded for the state of Oklahoma. **No sites** are listed in your project area, but based on the topographic and hydrologic setting of your project, archeological materials are likely to be encountered. **An** archeological field inspection is considered **necessary** prior to project construction in order to identify **significant** archeological resources that may **exist** in the project area. **Please** contact this office at (405)325-7211 if you require additional **information** on this project.

This environmental review and evaluation is performed in order to locate, record, and preserve Oklahoma's prehistoric and **historic** cultural heritage in cooperation with the State Historic Preservation Office, Oklahoma Historical Society. In addition to our review comments, under 36CFR Part 800.3 you are reminded of your responsibility to consult with the appropriate Native American tribe/groups to identify any concerns they may have pertaining to this undertaking and potential impacts to properties of traditional and/or ceremonial value. Thank you for your cooperation.

Sincerely,

  
Stance Hurst  
Staff Archaeologist

  
Robert L. Brooks  
State Archaeologist

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cc: SHPO



16

## Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

March 28, 2001

Bob Bonner  
Terracon  
10930 East 56<sup>th</sup> Street  
Tulsa, OK 74146

RE: Proposed storm water discharge area adjacent to the Port of **Catoosa**. Legal Description: SE ¼ NE ¼ Section 6 T20N R14E, Rogers County, **Oklahoma**.

Dear Mr. **Bonner**:

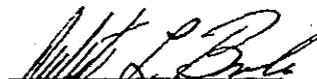
A **cultural** resources report of investigations has been received by **this** agency on **the above** referenced project. **This agency confirms the** recommendations contained in the **report**. **The review** was **conducted** in cooperation with the state **Historic Preservation Office, Oklahoma Historical** society.

Please contact this office at (405) 325-7211 if buried **archaeological** materials **such as** chipped **stone tools**, pottery, bone, **historic** crockery, glass, metal items, or building materials are exposed **during construction** activities.

**In** addition to our comment on the **cultural** resource inventory **conducted for this** project, under 36CFR Part 800.3 you are reminded of your responsibility to **consult** with **the** appropriate Native American **tribe/groups** for any **concerns** they may **have** pertaining to this report.

Sincerely,

\_\_\_\_\_  
Staff Archaeologist

  
Robert L. Brooks  
State Archaeologist

:ls

cc: SHPO  
Chris Cojeen  
Wichita & Affiliated Tribes  
Cherokee Nation



U.S. Department of Energy

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National Energy Technology Laboratory

January 28, 2002

Dr. Robert Brooks  
State Archaeologist  
Oklahoma Archeological Survey  
111 East Chesapeake, # 102  
Norman, OK 73019-5 111

Dear Dr. Brooks::

The United States Department of Energy (DOE) is considering participation in the Gas-to-Liquids Fuels Production and Demonstration Project, a project that would result in construction and operation of a facility to process natural gas into synthetic liquid fuels, primarily diesel fuel, at the Port of Catoosa Industrial Park in Rogers County, OK. A description of the proposed project is enclosed.

The proposed site for this project was subjected to review by your office in early 2001, and a follow-up archaeological survey, resulting from storm water pollution prevention activities at the site, was completed. I have also enclosed documentation from that review. As a result of the current proposal being considered by DOE, we are performing independent consultation in the exercise of our responsibilities as a Federal agency. Based on the descriptive information contained in the enclosures, please provide a determination regarding the potential existence of prehistoric or historic archaeological resources that could be eligible for listing in the National Register of Historic Places.

Based on the scope of the proposed project, a preliminary examination of the proposed site, and the potential for the project to result in minimal environmental consequences, DOE has initiated preparation of an Environmental Assessment under the National Environmental Policy Act. Information that you provide will be incorporated into and appropriately addressed in the Environmental Assessment. If your initial review concludes that no archaeological properties of significance are present in the project area, a written acknowledgement of that conclusion would be appreciated. In any case, the information that you provide will be considered in preparing a draft Environmental Assessment, which will be provided for review upon availability.

Should you require additional information, please contact me by telephone at 412-386-6159 or by e-mail at 'lorenzi@netl.doe.gov.'

Sincerely,

Lloyd Lorenzi, Jr.  
NEPA Compliance Officer

Enclosures



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# Oklahoma Archeological Survey

January 29, 2002

THE UNIVERSITY OF OKLAHOMA

**Lloyd Lorenzi**  
US Department of Energy  
PO Box 10940  
Pittsburgh, PA 15236.0940

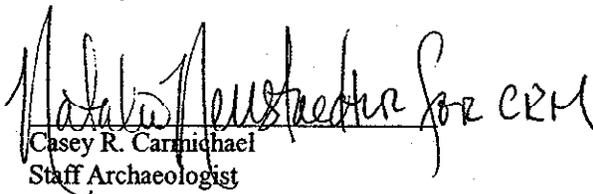
RE: Terracon proposed general permit for Storm Water Discharge, Project 53017001, Port of Catoosa Industrial Park. Legal Description: Part of NE ¼ Section 6 T20N R15E, Rogers County, Oklahoma.

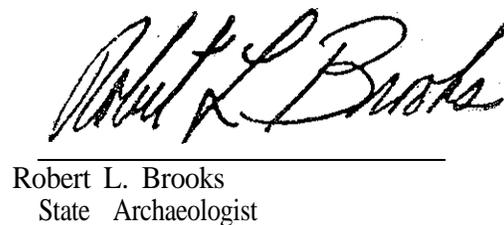
Dear Mr. Lorenzi:

The above referenced project has been reviewed by the Community Assistance Program staff of this agency to identify potential areas that may contain prehistoric or historic archaeological materials (historic properties). The location of your project has been cross-checked with the state site files containing approximately 17,500 archaeological sites which are currently recorded for the State of Oklahoma. Our records indicate that your project area has been previously surveyed for other projects, and that no significant cultural resource sites were located. Thus, an additional field inspection is not considered necessary for your project. However, should construction activities expose buried archeological materials such as chipped stone, tools, pottery, bone, historic crockery, glass, metal items or building materials, this agency should be contacted immediately at (405)325-7211. A member of our staff will be sent to evaluate the significance of these remains.

This environmental review and evaluation is performed in order to locate, record, and preserve Oklahoma's prehistoric and historic cultural heritage in cooperation with the State Historic Preservation Office, Oklahoma Historical Society. In addition to our review comments, under 36CFR Part 800.3 you are reminded of your responsibility to consult with the appropriate Native American tribe/groups to identify any concerns they may have pertaining to this undertaking and potential impacts to properties of traditional and/or ceremonial value.

Sincerely,

  
Casey R. Carmichael  
Staff Archaeologist

  
Robert L. Brooks  
State Archaeologist

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cc: SHPO



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## Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

March 7, 2002

Lloyd Lorenzi, Jr.  
NEPA Compliance Officer  
National Energy Technology Laboratory  
626 Cochrans Mill Road  
P. O. Box 10940  
Pittsburg, PA 15236-0940

Re: *Environmental Assessment: Integrated Concepts & Research Corporation and Syntroleum Corporation, Gas-th-Liquid Fuels Production and Demonstration Project, Tulsa Port of Catoosa, Rogers County, Oklahoma.*

Dear Mr. Lorenzi:

I have completed a review of the above referenced document and treatment of cultural resources for the proposed action. As noted this location was examined for cultural resources in 2001 with negative findings. Thus, the principal means that cultural resources would be encountered during the project is through inadvertent discovery. Provisions noted on page 36 of the environmental assessment should be adequate to handle any such encounters. It is my opinion that the environmental assessment accurately reflects information concerning **cultural** resources and contains provisions for handling currently undocumented resources.

This review has been conducted in cooperation with the State Historic Preservation Office; Oklahoma Historical Society.

Sincerely,

Robert L. Brooks  
State Archaeologist

cc: SHPO



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## CHEROKEE NATION

P.O. Box 948  
Tahlequah, OK 74465-0948  
918-456-0671

Chad "Cornassel" Smith  
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Principal Chief

Hastings Shade  
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Deputy Principal Chief

March 19, 2001

Mr. Bob Bonner, Env. Scientist  
Terracon  
10930 E. 58<sup>th</sup> St.  
Tulsa, OK 74146

Re: *Project # 53017001*

Dear Mr. Bonner:

I received your agency's project plans, *Storm Wafer Pollution Prevention. Plan Site # 53017001*. Our review of this project finds we have no objection to this particular proposal. However, the Cherokee Nation urges your agency to follow all applicable rules, regulations, and best management practices while conducting all activities. Additionally, we would ask all possible efforts be made to assure the environment is both protected and respected.

Sincerely,

Pat Gwin, Environmental Specialist  
Environmental Review Office  
Tribal Operations Division

Phone - 918/456-0671 ext. 2704  
Fax - 918/458-0329  
Email - [pgwin@cherokee.org](mailto:pgwin@cherokee.org)

TOPS:NatRes/Realty:psg:psg:110100



# Oklahoma Historical Society

Founded May 27, 1893

State Historic Preservation Office • 2704 Villa Prom \*Shepherd Mall • Oklahoma City, OK 73107-2441

Telephone 405/521-6249 • Fax 405/947-2918

3a

March 15, 2001

Mr. Bob Bonner  
**Terracon**  
10930 East 56th Street  
Tulsa, OK 74146

RE: File #1221-01; Proposed Storm Water Project #53017001

Dear Mr. Bonner:

We have received and reviewed the documentation submitted on the referenced project in Rogers County. Additionally, - we have examined, the information contained in the Oklahoma Landmarks Inventory (OLI) files and other materials on historic resources available in our office.

In addition to our review, you must contact the Oklahoma Archeological Survey (OAS), 111 East Chesapeake, Room #102, Norman, OK 73019-5111 (#405/325-7211), to obtain a determination about the presence of pre-historic resources that may be eligible for the National Register of Historic Places. Should the OAS conclude that there are no archaeological sites or other types of historic properties, as defined in 36 CFR Part 800.16(1), which are eligible for inclusion 'in the National Register of Historic Places within the project area and 'that' such sites are unlikely to occur,, we find that there are no historic properties-affected within the referenced project's area of potential effect.

The OAS may conclude that an on-site investigation of all or part of the project impact area is necessary to determine the presence of archaeological resources. In the event that such an investigation reveals the presence of archaeological sites, we will defer to the judgment of the OAS concerning whether or not any of the resources should be considered "historic properties" under the Section 106 review process.

Should further correspondence pertaining to this project be necessary, the above underlined file number must be referenced. Thank you. \_\_\_\_\_

Sincerely,

Melvena Heisch  
Deputy State Historic.  
Preservation officer

MH:pm



U.S. Department of Energy

36



National Energy Technology Laboratory

December 21, 2001

Dr. Bob L. Blackburn  
State Historic Preservation Officer  
Oklahoma Historical Society  
2100 North Lincoln Boulevard  
Oklahoma City, OK 73 105

Dear Dr. Blackburn:

The United States Department of Energy (DOE) is considering participation in the Gas-to-Liquids Fuels Production and Demonstration Project, a project that would result in construction and operation of a facility to process natural gas into synthetic liquid **fuels**, primarily diesel **fuel**, at the Port of Catoosa Industrial Park in Rogers County, OK. A description of the proposed project and graphics depicting its location are enclosed.

As part of our coordination and consultation responsibilities, and to comply with provisions **implementing** Section 106 of the National Historic Preservation Act of 1966, we would appreciate receiving any information you have regarding historic or **cultural** properties in the project area. Your thoughts on the potential impacts associated with the proposed project would also be appreciated.

Based on the scope of the proposed project, a preliminary examination of the proposed site, and the potential for the project to result in minimal environmental consequences, DOE has initiated preparation of an Environmental Assessment under the National Environmental Policy Act. Information that you provide will be incorporated into and appropriately addressed in the Environmental Assessment. **If your** initial review concludes that no historic or cultural properties are present in the project area, a written acknowledgement of that conclusion would be appreciated. In any case, the information that you provide will be considered in preparing a **draft** Environmental Assessment, which will be provided for review upon availability.

Should you require additional information, please contact me by telephone at 412-386-6159 or by e-mail at **lorenzi@netl.doe.gov.**

Sincerely,

Lloyd Lorenzi, Jr.  
NEPA Compliance Officer

Enclosures

(3c)



# Oklahoma Historical Society

Founded May 27, 1893

State Historic Preservation Office • 2704 Villa Prom • Shepherd Mall • Oklahoma City, OK 73107-2441

Telephone 405/521-6249 • Fax 405/947-2918

January 23, 2002

Mr. Lloyd Lorenzi Jr.  
NEPA Compliance Officer  
P.O. Box 10940  
Pittsburgh, PA 15236-0940

RE: File #0673-02; Port of Catoosa Gas-to-Liquids Fuels Project

Dear Mr. Lorenzi:

We have received and reviewed the documentation submitted on the referenced project in Rogers County. Additionally, we have examined the information contained in the Oklahoma Landmarks Inventory (OLI) files and other materials on historic resources available in our office. We find that there are no known historic properties affected within the referenced project's area of potential effect.

In addition to our review, you must contact the Oklahoma Archeological Survey (OAS), 111 E. Chesapeake, #102, Norman OK 73019-5111 (#405/325-7211, FAX #405/325-7604), to obtain a determination about the presence of prehistoric resources that may be eligible for the National Register of Historic Places. Should the OAS conclude that there are no prehistoric archeological sites or other types of "historic properties," as defined in 36 CFR Part 800.16(1), which are eligible for inclusion in the National Register of Historic Places within the project area and that such sites are unlikely to occur, we concur with that opinion.

The OAS may conclude that an on-site investigation of all or part of the project impact area is necessary to determine the presence of archeological resources. In the event that such an investigation reveals the presence of prehistoric archeological sites, we will defer to the judgment of the OAS concerning whether or not any of the resources should be considered "historic properties" under the Section 106 review process. If sites dating from the historic period are identified during the survey or are encountered during implementation of the project, additional assessments by the State Historic Preservation Office will be necessary.

Should further correspondence pertaining to this project be necessary, the above underlined file number must be referenced. If you have any questions, please contact Charles Wallis, RPA, Historical Archeologist, at 405/521-6381. Thank you.

Sincerely,

Melvena Heisch  
Deputy State Historic  
Preservation Officer

MH:hg



Oklahoma

Natural Heritage Inventory

OKLAHOMA BIOLOGICAL SURVEY  
111 E. Chesapeake Street  
Norman, Oklahoma 73019-0575, USA  
(405) 325-1985  
FAX: (405) 325-7702

4

Bob Bonner  
Terracon  
10930 East 56th St.  
Tulsa, OK 74146

Thursday, March 01, 2001.

OBS Ref.: 2001-088-OTH-BON

Re: Project No. 53017001: Construction Storm Water Pollution Prevention Plan

Dear Mr. Bonner,

This letter is in response to your request for information on the presence of endangered species or other elements of biological significance at the referenced site. We have reviewed the information currently in the Natural Heritage Inventory database and have found no records of elements at the location you describe.

Because the database is only as complete as the information that has been collected, we cannot say with certainty whether or not a given site harbors rare species or ecological communities. We suggest you also contact the Natural Resources Section of the Oklahoma Department of Wildlife Conservation, as they may have site specific information of which we are unaware.

Sincerely,

Grant Elam  
Research Specialist



U.S. Department of Energy

(5a)



National Energy Technology Laboratory

December 21, 2001

Mr. Richard Stark  
U.S. Fish and Wildlife Service  
Oklahoma Ecological Services Field Office  
222 South Houston; Suite A  
Tulsa, OK 74 127-8909

Dear Mr. Stark:

The United States Department of Energy (DOE) is considering participation in the Gas-to-Liquids Fuels Production and Demonstration **Project**, a project that would result in construction and operation of a facility to process natural gas into synthetic liquid fuels, primarily diesel fuel, at the Port of Catoosa Industrial Park in Rogers County, OK. A description of the proposed project and graphics depicting its location are enclosed.

As part of our coordination and consultation responsibilities, and to **comply** with both Section 7 of the Endangered Species Act of 1973, as amended, and provisions of the Fish & Wildlife Coordination Act, we would appreciate receiving any information you have **on wildlife** resources, including endangered and threatened species or critical habitat, in the project area. Your thoughts on the potential impacts associated with the proposed project would also be appreciated.

**Based** on the scope of the proposed project, a preliminary examination of the proposed site, and the potential for the project to **result** in minimal environmental consequences, DOE has initiated preparation of an Environmental Assessment under the National Environmental Policy Act. Information that you provide **will** be incorporated into and appropriately addressed in the Environmental Assessment. If your initial review concludes that **no endangered** or threatened species (**ort** their habitat) are present in the project area, and that neither Protected species not their habitat would be affected by the proposed action, a written **acknowledgement** of that conclusion would be appreciated. In any case, the information that you provide **will** be considered in preparing the draft Environmental Assessment, which **will** be provided for review upon availability.

Should you require additional information, please contact me by telephone at 412-386-6159 or by e-mail at 'lorenzi@netl.doe.gov.'

Sincerely,

Lloyd Lorenzi, Jr.  
NEPA Compliance Officer

Enclosures



United States Department of the Interior  
**FISH AND WILDLIFE SERVICE**  
Division of Ecological Services  
222 South Houston, Suite A  
Tulsa, Oklahoma 74127

56

In Reply Refer To:  
FWS/R2/OKES/02- Log #02-0069

January 29, 2002

Consultation #2-14-02-I-0277

U. S. Department of Energy  
National Energy Technology Laboratory  
Attn: Lloyd Lorenzi, Jr., NEPA Compliance Officer  
626 Cochrans Mill Road  
P.O. Box 10940  
Pittsburgh, PA 15236-0940

Dear Mr. Lorenzi:

**This** responds to your letter dated December 21, 2001, wherein you requested the Fish and Wildlife Service (Service) to provide comments regarding the proposed Gas-to-Liquids Fuels Production and Demonstration Project. The proposed project will result in construction, which would comprise a 12 month effort, and operation of a facility for six months with sufficient size to test the feasibility of gas-to-liquids (GTL) technology. The facility would be used to process natural gas into synthetic ultra-clean liquid fuels, primarily diesel fuel, for fleet vehicle testing in Washington DC, and in the Denali National Park in Alaska. The location of the proposed facility is on a 10-acre tract of **land** within the existing Port of Catoosa Industrial Park in Section 6, **T20N, R15E**, Rogers County, Oklahoma. The United States Department of **Energy (DOE)** has initiated preparation of an Environmental Assessment under the National **Environmental** Policy Act for the proposed project. The Service's Oklahoma Ecological Services Field **Office** has reviewed the description of the proposed project. The comments provided here regard the portion of the project (construction and operation of the proposed facility) within our area of responsibility (Oklahoma).

Pursuant to Section 7 of the Endangered Species Act, the Service has enclosed a list **of the federally-** listed species that occur **within** Rogers County. Our data indicate that no federally-listed species are known to occur within the vicinity of the project area except for occasional transient threatened bald eagles. For this reason, we believe the proposed project is not likely to adversely affect any federally-listed species; therefore, no **further** endangered species consultation is necessary. Should project plans change, or if additional information on the distribution of listed or proposed species becomes available, this determination may be reconsidered.

We appreciate the opportunity to comment on the proposed project. If we can be of further assistance, please contact Richard Stark at 918-581-7458, extension 240.

Sincerely,

*Kenneth D. Frazin*

*for* Jerry J. Brabander  
Field Supervisor

Enclosed

OKLAHOMA  
FEDERALLY LISTED THREATENED OR ENDANGERED SPECIES,  
PROPOSED SPECIES, AND CANDIDATE SPECIES,  
ROGERS COUNTY  
JANUARY 2001

<u>COUNTY</u>	<u>SPECIES</u>	<u>CLASSIFICATION</u>
Rogers	interior least tern	Endangered
	whooping crane	Endangered
	bald eagle	Threatened
	piping plover	Threatened
	western prairie <b>fringed</b> orchid	<b>Threatened</b>
	Arkansas darter	Candidate
	Neosho <b>mucket</b>	Candidate



# United States Department of the Interior

6

NATIONAL PARK SERVICE  
2525 Gambell Street, Room 107  
Anchorage, Alaska 99503-2892

IN REPLY REFER TO:

L7617(AKSO-RER)

03/22/02

Llyod Lorenzi, Jr.  
NEPA Compliance Officer  
U.S. Department of Energy  
National Energy Technology Laboratory  
626 Cochran Mill Road, P.O. Box 10940  
Pittsburgh, PA 15236-0940

Dear Mr. Lorenzi:

Thank you for the opportunity to comment on the Department of Energy (DOE) draft environmental assessment (EA) for the Gas-To-Liquids (GTL) Fuels Production and Demonstration Project (DOE/EA-1417, March 2002). The National Park Service (NPS) has received the document and comments follow for your consideration.

The National Park Service (NPS) is pleased to be associated with this forward-looking technology project, which could result in the production and use of cleaner fuels for vehicles requiring diesel-like products. As we understand from the cover letter, EA cover sheet, introduction to the EA, project description in section 3.3.2.1, and analysis section 4.16.1.2, three buses would use the GTL fuels in Denali National Park and be compared to three buses in the same fleet using conventional diesel fuel. We also understand the demonstration project is expected to show great reductions in the emissions of sulfur dioxide (SO<sub>2</sub>), and lesser reductions in CO, hydrocarbons, particulates, and NO<sub>x</sub>. The National Park Service is very interested in reducing emissions of SO<sub>2</sub>, NO<sub>x</sub>, and particulates because they can add to regional haze and reduced visibility in Class I Airsheds under the Clean Air Act (CAA). Denali National Park and Preserve is a Class I Area under the CAA, as are many other national parks and wilderness areas across the United States of America.

## General Comments

The EA contains a significant amount of pertinent technical information.

We find the juxtaposition of affected environment and environmental consequences by impact topic an interesting way to present the analysis for the proposed alternative.

The EA provides scant information about the no action alternative both in terms of what is already there on the site and in terms of impacts analysis of the no action alternative.

Table 3-3 on pages 17-19 is not fully supported with the environmental consequences of the no action alternative, section 8.0 page 46.

Because Denali National Park and the Washington DC Metropolitan Area Transit Authority (WMATA) are demonstration locations for the GTL fuels project, the EA should include a brief description of any infrastructure needed to carry out the demonstration project in these areas. Fuel storage tank(s) to hold GTL would be placed temporarily in the bus fueling area near the entrance of Denali National Park and Preserve. The tank(s) would be mounted on skids and could be removed after completion of the demonstration project. The size and configuration of these tanks and any fuel spill mitigation measures should be described, such as double-walled tanks with alarms and any special fuel spill response equipment and supplies for the GTL product. Also, the supposition that the GTL synthetic diesel fuel is more biodegradable than conventional diesel may be of public interest and concern for places like Denali National Park. We recommend describing in more detail those aspects of the demonstration project taking place in Denali National Park and the WMATA and the potential impacts to those environments, both adverse and beneficial. There should be obvious minor benefits to air quality in the demonstration areas with this project, but we are not presented with information to evaluate those effects. Examples of potential impacts to evaluate for the demonstration areas would be vehicle wear and tear, potential for fuel spills, noise from differential engine performance, if any, and changes in exhaust odor from conventional diesel to GTL fuel. Conventional #2 diesel is known to produce nauseating polyaromatic hydrocarbons and soot. How would emissions from vehicles using GTL fuels differ in terms of its effects on the visiting public and the environment?

#### Specific Comments

Page 3, Full Paragraph 4, Line 1: Delete the 9 from “response.”

Pages 14-15, Section 3.3.2.1, Bus Fleet Demonstration: This section should describe the transport, storage, and use of the GTL fuels in Denali National Park and Washington, DC. What size and how many tanks would be installed at Denali National Park to segregate the GTL fuel from conventional diesel and maintain purity? The bus-operating season at Denali National Park would be a maximum of 5 months (May through September) and depending on weather and road conditions could be as short as four months (mid-May to mid-September).

Page 23 Section 4.4, Aesthetics and Visual Resources: This section should acknowledge Denali National Park as part of the test area and evaluate the potential effects on visual resources from the fuel tanks and expected reduced fuel emissions. The GTL fuel tank(s) would be placed near the existing diesel tanks in the bus fueling area of Denali National Park on an already disturbed area. No vegetation would need to be removed. The general public would not see these tanks from the Denali Park Road. The tanks might be observed from park trails in the entrance area along with other developments in the entrance area of the park.

Pages 24-28, Section 4.5, Air Resources: Though the primary part of the project takes place near Tulsa, Oklahoma, the bus demonstrations take place in Denali NP and Washington, DC. Air quality in these areas should also be described briefly. Denali National Park has some of the cleanest air in the nation according to various air quality monitoring near the park entrance area, and the park is a Class I Area under the Clean Air Act Amendments (Contact Andrea Blakesley

at 907-683-9545 for details). Emissions estimates of VOCs from storage tanks in Denali NP and Washington DC should be added to table 4-4.

Pages 30-32, Section 4.8 Noise: Would engine noise from buses using GTL fuels and retrofitted with new engines differ from the noise from buses using conventional diesel fuel and engines? This should be addressed for the bus demonstration areas.

Page 34, Section 4.13.1 Biological Resources in Affected Environment: This section does a poor job of describing the vegetation on the site. What forest species dominate the area, and what grassland types occur there? The statement regarding land use activities in the area, including coal mining, would be better placed in section 4.9 on Land Use.

Page 35, Section 4.13.2.1 Wildlife: Unless the site would be reclaimed after a period of time, we question why the impacts to smaller, less mobile **animal** populations would be temporary. We think the project would displace for a long time or permanently such species at the site. The impacts of this project should be considered cumulatively with other projects in the area.

Page 35, Section 4.13.2.2 Vegetation: Why are the woodlands 20 years old or less? Was the area formerly mined or logged? Why would the impacts to vegetation on the 10-acre project site be short-term? Section 4.9.2 states the woodlands, grasses and forbs would be replaced by the GTL production plant. This implies the impacts would be long-term and possibly permanent. Though a relatively small area, the impact would be cumulative with similar impacts to vegetation in the area. The cumulative impacts would likely be negligible when added to past, ongoing, and anticipated future impacts to the area. This, however, should be evaluated.

Page 37, Section 4.16.1.2, Affected Environment of Bus Fleet Tests at WMATA and Denali National Park: This section should briefly describe the bus sizes and fleet sizes at WMATA and **Denali** NP so the reader understands the magnitude of the test and the potential environmental effects to the test areas. Perhaps the **fuel** storage and fueling stations should be briefly described here too, so the reader can picture the relative size of the temporary fuel tank installation for the GTL fuel. Also, this section should describe the number **of the** bus passengers in the test areas for the test periods, the lengths of trips between refueling stations, and the frequency of use **of** the test buses.

Page 38, Section 4.16.2.2 Bus Fleet Tests at WMATA and Denali National **Park**: The information in this section is interesting, but it seems to address reductions in projected emissions, not **traffic** and transportation issues. This discussion would be better located under the **section addressing** air quality in the **test areas**. Because the GTL fuel mileage is about **1 – 6 %** less than with conventional diesel, the test buses would need to be **refueled** more frequently. What would be the effective range of these buses? Would they be able to make the longer trips in Denali National Park (RT distance of about 180 miles)?

Page 39, Section 4.18, Pollution Prevention: This section should describe in greater detail the storage tank designs to prevent pollution, alarm systems, and pollution response capability and organization at the plant and test fleet areas. The sentence regarding topsoil stockpiling for final landscaping and contouring should be placed either in the section 4.2 (site soils and topography) or section 4.4 (aesthetics and visual resources).

Page 48, Section 10.0 Relationship of the Proposed Action to Applicable Land Use Plans and Policies: (Change the word ‘OT’ in the header to *TO*, which should correct the spelling error in the table of contents too.) We note the proposed action also includes testing the fuels in Denali National Park and Washington, DC, so the proposed action should also be evaluated with respect to management policies for these areas. The National Park Service Management Policies (NPS 2001, pp. 40-41) states, “The NPS has a responsibility to protect air quality under both the 1916 NPS Organic Act and the Clean Air Act (CAA). The Service will seek to perpetuate the best possible air quality in parks to (1) preserve natural resources and systems; (2) preserve cultural resources; and (3) sustain visitor enjoyment, human health, and scenic vistas. . . Although the CAA gives the highest level of air quality protection to Class I areas, it provides many opportunities for the Service to participate in the development of pollution control programs to preserve, protect, and enhance the air quality of all units of the National Park System. . . The Service will minimize air quality pollution emissions associated with park operations, including the use of prescribed fire and visitor use activities.” In the Denali National Park and Preserve Strategic Plan the NPS GPRA goal for air quality is, “By 2002, air quality in at least 50% of Class I park areas improves or does not degrade from 1997 baseline conditions.” The park goal states, “By 2002, air quality does not degrade from 1998 baseline conditions (NPS 1997).” We believe it is wholly appropriate and consistent with policies and goals for the NPS and Denali National Park to cooperate with the testing of GTL fuels.

Thank you for the opportunity to comment on this EA. If you have any questions about these comments, feel free to call or email Mr. Bud Rice of my staff at (907) 257-2466 or [Bud\\_Rice@nps.gov](mailto:Bud_Rice@nps.gov).

Sincerely,

/s/

Joan B. Darnell  
Team Manager, Environmental Resources

cc:  
Superintendent, Denali Park and Preserve,  
Elwood Lynn, Maintenance Manager, Denali Park and Preserve

