

# Colville Delta 8 Project

## Environmental Impact Statement

### Scoping Summary Report

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PREPARED FOR

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## PUBLIC ENGAGEMENT AND SCOPING PROCESS

Public engagement is an integral part of the National Environmental Policy Act (NEPA) process and is required in the preparation and implementation of agencies' NEPA procedures. Scoping is the process of soliciting input on the issues, alternatives, and impacts that will be analyzed in a NEPA document. Information received during the scoping process will be used in the development of the Colville Delta 8 Project (Project) environmental impact statement (EIS) and will help define the scope for environmental analysis.

The U.S. Army Corps of Engineers (USACE) published a notice of intent (NOI) to prepare an EIS for the Project on September 22, 2025, via special public notice. The scoping period lasted for 30 days, from September 22 through October 22, 2025.

### Public Scoping Meetings

USACE conducted five public scoping meetings: four in person and one held virtually. In-person meetings were held in Nuiqsut, Utqiāġvik, Fairbanks, and Anchorage. Meeting dates and locations were advertised on the Project's website, social media, and through local media (print and radio). Meeting postcards were sent to every post office box in Nuiqsut and to the Project mailing list, and flyers were sent to local organizations to be posted in public locations. Email announcements were sent to the Project mailing list. At the public meetings, USACE presented an introduction to the Project, meeting participants asked Project-related questions, and community members provided verbal comments. Table 1 provides details of the public scoping meetings.

**Table 1. Summary of Public Scoping Meetings**

Meeting	Date	Location
Public scoping meeting	September 29, 2025	Fairbanks
Public scoping meeting	September 30, 2025	Nuiqsut
Public scoping meeting	October 1, 2025	Utqiāġvik
Virtual public scoping meeting	October 6, 2025	Virtual
Public scoping meeting	October 7, 2025	Anchorage

### COMMENT SUMMARY

In total, 22 respondents submitted comments during the scoping period. Public comments were received by email, through the Project's website, by verbal comments provided at public meetings, and by hard-copy fillable forms provided at the public meetings. Most respondents were individuals, with the exception of one Tribe, one Alaska Native corporation, four organizations, and one government agency (Table 2). Three of the organizations submitted a joint comment letter. Individuals who provided their business title or employer information in their letter or comment but did not state that they were an official representative were counted as individuals as opposed to businesses or organizations.

**Table 2. Respondent Groups**

Respondent Group Type	Respondent Title
Tribes and Tribal entities	Native Village of Nuiqsut Kuukpik Corporation
Government agencies	U.S. Environmental Protection Agency
Businesses and organizations	Center for Biological Diversity Grandmothers Growing Goodness Sovereign Inupiat for a Living Arctic Native Movement

Within each submittal or meeting transcript, individual comments (i.e., stand-alone comments that relate to a single issue, idea, or conclusion) were identified and grouped into one or more of the categories listed in Table 3. Comment categories are either defined by individual resources that may be affected by the Project, individual elements of the Project, or specific phases and aspects of the EIS or NEPA process. Categories are intended to describe the main topic or resource that is discussed in the comment, regardless of whether the comment expresses opposition or support for the Project as it relates to that topic.

**Table 3. Comment Categories**

Resource Topics	Project Element Topics	EIS or NEPA Process Topics
Air quality	Permitting and regulations – general	Request for comment period extension
Birds	Permitting – USACE	Stakeholder engagement
Climate	Purpose and need	EIS process or timeline
Cultural resources	Project description	
Economics	Alternatives	
Energy and mineral needs	Analysis methods	
Fish	Avoidance, minimization, and mitigation	
Landownership and use	Data	
Marine mammals		
Noise		
Public health		
Sociocultural systems		
Soils and permafrost		
Spills and hazardous materials		
Subsistence		
Terrestrial wildlife		
Visual resources		
Water resources		
Wetlands and vegetation		

In all, 257 individual comments were identified from the various submittals and were categorized as shown in Table 4. Approximately one third of the comments fall under the following two categories: Alternatives and Public Health.

Table 5 presents a summary of key points expressed in the comment letters. In the Alternatives category, some comments do not directly suggest alternatives, but express general concern about the proximity of the Project components (e.g., the drill site) to the community of Nuiqsut, which has implications for the alternative selection process.

**Table 4. Comments Received**

Comment Category	Number of Comments Received	Percentage of Total Comments (%)
Alternatives	43	17
Public health	38	15
Subsistence	23	9
Stakeholder engagement	16	6
Spills and hazardous materials	16	6
Sociocultural systems	13	5
Avoidance, minimization, and mitigation	12	5
Air quality	12	5
Analysis methods	7	3
Cultural resources	7	3
Marine mammals	7	3
Terrestrial wildlife	7	3
Water resources	7	3
Climate	6	2
Economics	6	2
Data	5	2
EIS process or timeline	5	2
Project description	4	2
Fish	3	1
Permitting – USACE	3	1
Purpose and need	3	1
Soils and permafrost	3	1
Noise	2	< 1
Permitting and regulations – general	2	< 1
Request for comment period extension	2	< 1
Visual resources	2	< 1
Birds	1	< 1
Landownership and use	1	< 1
Wetlands and vegetation	1	< 1
<b>Total</b>	<b>257</b>	<b>100</b>

**Table 5. Comment Summary**

Comment Category	Summary of Key Points
Air quality	Commenters requested a discussion of air quality impacts in the EIS; specifically, commenters requested information regarding Project emissions and potential impacts on human health, climate and compliance with air quality standards. One commenter recommended that the EIS evaluate current air quality conditions, forecast the impacts of Project activities, and address all relevant pollutants and health risk thresholds for hazardous air pollutants. Additionally, one commenter noted that the EIS should propose mitigation measures such as equipment upgrades, best management practices, dust suppression, and advanced emission controls to reduce adverse impacts. Specific pollutants of concern mentioned include fine particulate matter, nitrogen oxides, volatile organic compounds, and greenhouse gases. Commenters expressed concern for air pollution and the risk of toxic waste from potential blowout events and requested support for a community-led air monitoring program.

Comment Category	Summary of Key Points
Alternatives	Numerous commenters noted that the Project would be too close to the community of Nuiqsut. Some commenters proposed alternative locations such as across the Colville River near existing industrial areas or farther south. Commenters suggested collaborative development with neighboring operators to consolidate impacts or suggested buffer zones where development should not occur. Commenters noted that alternatives should also consider using gas beneficially for local energy needs instead of flaring. One commenter suggested using only ice roads to access the drillsite, similar to Alpine CD3 to minimize habitat fragmentation. One commenter emphasized the importance of not minimizing the size of roads and gravel pads for safety and environmental reasons, noting that proper access can prevent congestion and related issues. Another commenter requested the development of a road into the community and region, which could reduce winter production impacts and erosion caused by ice roads and offer economic and emergency benefits. Commenters suggested drilling from existing sites, reconfiguring pad locations, and ensuring that alternatives maintain long-term viability of subsistence resources and access. One commenter emphasized that alternatives should not be dismissed solely for economic reasons if they still meet the Project's purpose.
Analysis methods	Commenters requested a detailed cumulative impacts analysis in the EIS using both Western science and Indigenous knowledge, with clear acknowledgment of any information gaps and commitments to ongoing monitoring. Commenters also suggested cumulative impacts regarding how multiple projects interact and collectively affect resources like caribou herds, air quality, and public health. Commenters suggested that the EIS analyze how adding the Project would compound habitat loss, traffic, air emissions, noise, and spill risks, considering not only direct effects but also how new infrastructure can induce further industrial expansion and future impacts on the Colville Delta and subsistence areas. Commenters requested that the alternatives analysis provide detailed side-by-side comparisons, including route maps, noise and light estimates, wetlands impact, and spill modeling to help the community understand the differences and implications.
Avoidance, minimization, and mitigation	Commenters requested independent air quality monitoring and a substantial impact fund to the Nuiqsut community and comprehensive emergency response planning coordinated with local government and the Tribal council. One commenter noted that an evacuation plan should include logistics, shelter, transportation, and communication protocols. Commenters requested restrictions on construction during peak caribou migration periods and suggested Tribal involvement in monitoring and enforcement. Commenters expressed concern that previous mitigation measures have been ineffective or not responsive to community needs, particularly regarding blasting, gravel extraction, and infrastructure. One commenter asked if ConocoPhillips Alaska, Inc. (CPAI), would be required to purchase credits at a mitigation bank, and another asked if thresholds would be established for heavy equipment usage during winter. Overall, commenters requested that mitigation efforts be community centered.
Birds	One commenter noted that migration routes for birds is a key issue that should be evaluated in the EIS.
Climate	Commenters noted general concern about a changing Arctic climate, particularly pointing out changing conditions in the Colville River Delta and on the North Slope in general. Commenters noted the Project's contribution to a continuing changing climate.
Cultural resources	Commenters requested an evaluation of traditional uses and requested incorporation of Indigenous knowledge and communication with stakeholders to ensure cultural values are properly evaluated and protected. One commenter expressed concern about whether Federal agencies adequately consider historical and cultural connections when reviewing development proposals. Another commenter requested a stand-alone cultural-landscape study.
Data	Commenters requested health surveys to assess the potential impact of Project-related pollution or disturbances. If these data cannot be obtained, commenters requested that USACE acknowledge the data gaps and develop a monitoring program. Regarding wildlife data, commenters requested that USACE collect and disclose caribou movement data around the Colville River and compare conditions from previous development. Commenters asked how general regulatory reports would be analyzed and included in the EIS. Commenters expressed concern about the incorporation of Indigenous knowledge, stating that this knowledge is mostly oral and may require community outreach. Commenters also questioned the validity of data collected by CPAI and expressed concern about transparency and integrity of data collection. One commenter expressed frustration that studies often focus narrowly on wildlife, neglecting broader impacts on human health and socioeconomic well-being, and called for more comprehensive, unbiased research and reporting throughout the NEPA process.

Comment Category	Summary of Key Points
Economics	One commenter expressed that the Project would increase revenue to the State, and would provide jobs and opportunities for Alaska residents. Other commenters noted that although increased oil production from the Project would boost pipeline throughput and State revenue, supporting services and creating jobs and opportunities, they had concern about true economic and social benefits. Some commenters expressed concern that corporations prioritize profits over local well-being, noting that local workers face fierce competition for limited opportunities. Commenters requested a thorough examination of the economic outcomes and production scenarios. Lastly, one commenter highlighted the need to balance economic benefits with general impacts on the environment and local communities.
EIS process or timeline	One commenter formally requested participation as a cooperating agency for the Project, rather than consulting as a Tribal entity. Another commenter was concerned about the perceived lack of a published NOI noting that the timeframe (5 days) between the NOI and the first public meeting was limited. An additional commenter requested that the EIS process remain efficient and focused on the NEPA timeline.
Fish	One commenter expressed concern that fish are becoming ill from development. One commenter requested the EIS evaluate the Project's potential effects on fish migration, habitats, and water quality, especially at roads and pipeline crossings. Another commenter requested incorporation of Indigenous knowledge from local fishermen to understand fish use in the area.
Landownership and use	One commenter asked about joint ownership of the land and about the decision-making process in case of conflict.
Marine mammals	Commenters expressed concern that the Project may affect several species listed under the Endangered Species Act (ESA), such as polar bear, ice seals (ringed and bearded seals), and Steller's eider. Commenters requested application of protections and considerations required under the ESA.
Noise	One commenter expressed concern about noise pollution from the Project, and another commenter asked if Nuiqsut residents would be able to hear drilling from the town.
Permitting – USACE	One commenter asked how USACE's decisions on discharge of fill may affect local water resources. Another commenter noted that USACE should favor alternatives that are less damaging (alternatives in upland or without roads), per 404(b)(1) guidelines.
Permitting and regulations – general	One commenter noted that the process for obtaining Kuukpik Corporation's approval on certain issues is unclear, raising questions about authority and how local input is considered, particularly when some Nuiqsut elders have relocated to urban areas and may no longer be directly impacted. One commenter expressed frustration with the role of Arctic Slope Regional Corporation (ASRC) and its delegates in regulatory and permitting decisions, noting that authority is perceived as a monopoly, with little accountability from State or Federal agencies. Commenters expressed concern that the permitting system lacks transparency and can be unresponsive to residents' concerns.
Project description	Commenters requested that the EIS disclose the expected volumes and emissions from flaring, including planned temporary flaring during well completion or testing, and noted that the EIS should outline commitments or regulatory requirements related to flaring. One commenter also requested clarity regarding oil production potential and if the Project involves fracking.
Public health	Commenters discussed general health concerns, stating that the community of Nuiqsut faces significant and growing health risks due to its proximity to oil and gas development and those risks would be compounded given the proximity of the Project to community homes, hunting grounds, and travel routes. Commenters expressed general concern about the short-term and long-term health of community members, including respiratory illnesses, neurological disorders, suicide rates, cancer, and mental health crises. Commenters asked for a study of baseline health data for Nuiqsut residents. One commenter asked for independent oversight on public health impacts and an independent body to monitor these impacts, expressing concern about industry-controlled data. Commenters requested the inclusion of community health data, not regional averages, and requested an analysis on both physical and mental health impacts, including cultural losses and sense of place, in the EIS. Another commenter requested strong public health protections and measures. One commenter expressed support of CPAI's Health, Safety & Environment Policy and other CPAI programs. Commenters noted that past incidents have led to inadequate emergency response and left the community vulnerable, thus the Project should include an emergency evacuation plan.

Comment Category	Summary of Key Points
Purpose and need	One commenter requested that the Project's purpose and need are defined in alignment with NEPA requirements and the broader public interest. Commenters noted that the purpose should reflect the public need for additional oil development while balancing mandates to protect wetlands, subsistence resources, and public health. One commenter noted that under the Clean Water Act Section 404(b)(1) Guidelines, USACE may only permit the "least environmentally damaging practicable alternative" (LEDPA) to meet the basic Project purpose, which requires articulating the purpose and need broadly enough to fully examine less-damaging alternatives, including different locations. Commenters noted that the purpose and need statement should recognize USACE's responsibility to protect aquatic resources and subsistence uses, not just the commercial interests of the applicant.
Request for comment period extension	Commenters formally requested an extension of the comment period. Commenters expressed concern that the current comment period coincides with the hunting, fishing, and harvesting season, as well as travel for the Alaska Federation of Natives conference, thus limiting the public's ability to prepare meaningful input.
Sociocultural systems	<p>Commenters noted that the subsistence way of life in Nuiqsut is deeply rooted in cultural continuity and the ability to practice traditions on ancestral lands, not just in the availability of resources. They commented that the increase of development has reduced open land for subsistence use. They commented that infrastructure threatens to fundamentally alter daily life and the community's connection to the land. Commenters expressed concern about the Project changing the quality of life in Nuiqsut and changing traditional ways of life, including the concern of health emergencies and food insecurity to psychological harm caused by the constant presence of industrial activity. Specifically, commenters expressed concern regarding the proximity of drilling sites to homes and Native allotments increased industrial traffic; light pollution; compromised water sources; and the physical impacts of blasting, such as cracks in homes and misaligned buildings. Commenters also expressed that impacts to humans and the community were the most critical issues that the EIS should address.</p> <p>Commenters stated that cumulative effects of development have eroded freedom and a sense of control, whereas social stressors like inadequate housing, lack of community investment from industry, and diminished spaces for children to socialize compound the burden. Commenters requested that the EIS analyze more-than-quantifiable metrics to reflect lived realities, cultural values, and the intangible impacts on "Inupiat life, health, safety, culture, and tradition." Commenters requested agencies to recognize and address the full spectrum of human-scale impacts and to require mitigation measures for them.</p>
Soils and permafrost	Commenters expressed concern about the safety and stability of infrastructure, including well casings, pad foundations, and pipeline supports in areas with permafrost. Commenters recommended that the EIS include up-to-date permafrost maps and ground temperature data to accurately assess these risks. Commenters noted that the necessity for a thorough analysis is underscored by the Alpine 2022 gas leak. Additionally, commenters noted that rapid permafrost thaw driven by rising Arctic temperatures along with increased coastal erosion from the loss of protective sea ice and rising sea levels are compounding concerns for infrastructure integrity.
Spills and hazardous materials	Commenters expressed concern about an increased severity of a potential spill given the proximity of the Project to the community and requested additional planning for evacuation in the case of a blowout or other inadvertent release. Commenters requested that the EIS analyze geological risks, well design, blowout preventer reliability, and worst-case discharge scenarios, including how oil or gas could spread through the Colville River Delta's channels, impacting fish, wildlife, and the community. Commenters requested that the EIS include spill probability analyses, detailed spill response plans, identification and management of hazardous waste, and compliance with all relevant regulations. Commenters also noted that response times and the adequacy of local resources for emergency response are critical issues, particularly as severe weather and remoteness can delay help. Commenters expressed concern regarding exposure to toxic chemicals like hydrogen sulfide; the lack of protective equipment or mitigation in the event of a spill. Commenters requested that public well-being, environmental protection, and transparent responsive spill planning are prioritized in the analysis.
Stakeholder engagement	Commenters emphasized the need for clear, understandable communication throughout the EIS process, including accurate explanations of abbreviations and technical terms, and the consideration of translation to Iñupiaq for public meetings. Commenters expressed concern about insufficient notice of the public meetings. Commenters requested meaningful consultation and the integration of Indigenous knowledge, through regular meetings in Nuiqsut during all stages of the EIS, with special sessions focused on topics like emergency response, caribou, and air quality. Commenters asked if landowners, Tribes, and local governments had been contacted for input on the Project. Commenters also expressed concern that one virtual meeting was not enough of an opportunity for the public to comment and requested an additional scoping meeting in Fairbanks.

Comment Category	Summary of Key Points
Subsistence	Commenters emphasized that subsistence is central to the Iñupiaq way of life, serving as both a food source and a foundation for cultural identity. Commenters generally expressed concern about changes to subsistence resource abundance and the impact of the Project on caribou migration. Commenters reported increasing stress on wildlife and a decline in fish health since development began, with observable pathology in local catches. Commenters requested analysis on gravel road infrastructure and the potential for it to create a barrier to caribou migration, restricting hunting opportunities for Nuiqsut residents who rely on the animals for subsistence and cultural continuity. Commenters noted that existing infrastructure has already disrupted migration routes, and additional development is expected to intensify these impacts. Commenters also noted that infrastructure changes not only affect animal populations but also alter how subsistence users access and use the land. Commenters also stated that the Project would force subsistence users to travel farther from the community to hunt and fish and that it may contaminate their food sources. Commenters noted that the EIS should comply with Section 810 of Alaska National Interest Lands Conservation Act by analyzing direct, indirect, and cumulative effects on subsistence, including modeling caribou movement, assessing impacts on fish and water quality, and evaluating changes to migratory bird habitats. Commenters expressed concerns for the future, as younger generations may lose the opportunity to learn traditional hunting and gathering practices, further eroding cultural connections. Commenters mentioned that mitigation measures, such as subsistence ramps, are often seen as inadequate compared to the reliability of natural migration routes. Commenters concluded that the protection of subsistence resources must be a key benchmark for Project approval.
Terrestrial wildlife	Commenters requested analysis on how the Project would impact wildlife, specifically caribou movement and migration patterns. Commenters noted that changes in caribou behavior could lead to altered migratory routes or delays in movement, making subsistence hunting more challenging. Commenters noted that community observations indicate that caribou presence has changed after increased development in the area. Commenters also stated that separating roads from pipeline racks by at least 500 feet should be considered to reduce visual barriers for wildlife. Commenters requested a review of caribou collar data in the Project area, along with modeling of potential impacts on migration and insect-relief behaviors. Commenters mentioned that it may be difficult to monitor wildlife interactions in the Project area via aerial surveys because of the proximity to Nuiqsut and that these surveys could disturb village residents.
Visual resources	Commenters questioned how intense the lighting from the Project would be and if it would be so bright that it could cause discomfort or harm, or if it would simply be a persistent annoyance. Commenters expressed concern about whether the sights, sounds, and odors associated with the Project would vary between winter and summer, which could affect day-to-day life in different ways depending on the season.
Water resources	Commenters requested an analysis on how the Project infrastructure, such as roads and causeways, might change surface water flow patterns, particularly during spring breakup when freshwater discharge is highest. Commenters noted the importance of analysis on whether the Project could cause ponding or erosion, and requested design solutions such as appropriate bridge spans, culvert capacity, and pier design to maintain natural hydrologic connectivity. Commenters also noted that construction of roads, pads, and pipelines across sensitive waterways could degrade fish habitat, alter water flows, and increase erosion and permafrost thaw. Commenters voiced concerns that the Project could impact Nuiqsut's secondary freshwater lake, which is a backup for the community's drinking water. Commenters recommended that infrastructure fill be placed parallel to local flow paths with adequate cross-drainage, and that embankments follow North Slope best practices, including thermal protection for permafrost for mitigation. Commenters requested an analysis of the effects of fugitive dust, gravel discharge, and the lateral migration of the Colville River channel. Lastly, commenters expressed concern about water quality monitoring and the adequacy of current testing.
Wetlands and vegetation	Commenter asked about identified wetlands and existing baseline wetlands studies.