UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

November 6, 2015

The Honorable Kimberly D. Bose
Secretary, Federal Energy Regulatory Commission
888 First Street Northeast, Room 1A
Washington, D.C. 20426

Docket Nos. CP13-483-000
CP13-492-000

Dear Secretary Bose:

The U.S. Environmental Protection Agency has reviewed the final Environmental Impact Statement for the Jordan Cove Energy and Pacific Connector Gas Pipeline Project (EPA Project Number 12-0042-FRC). Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act, and Section 309 of the Clean Air Act.

The project described in the final EIS is generally consistent with the project detailed in the April 2015 draft EIS. Specific components of the project include an access channel from the existing Coos Bay navigation channel to the terminal marine slip; marine slip, with a berth for one liquefied natural gas (LNG) vessel on the east side and a berth for tug boats on the north side; LNG loading system; LNG transfer line; LNG storage system, consisting of two full-containment LNG storage tanks, each with a net capacity of 160,000 cubic meters; boil-off gas recovery system; four natural gas liquefaction trains; refrigerant storage and resupply system; aerial cooling system; emergency systems and utilities and support structures; utility corridor including a 230-kilovolt transmission line and access road; and a pipeline gas conditioning facility.

The non-jurisdictional facilities associated with the Jordan Cove's LNG export terminal would include the South Dunes Power Plant, consisting of a nominal 420-megawatt natural gas–fired combined cycle electric generating system and heat recovery steam generator units; the Southwest Oregon Regional Security Center (SORSC); and other security and control facilities, administrative buildings, and support structures associated with the power plant.

The main jurisdictional natural gas pipeline facilities proposed by Pacific Connector include: a 232-mile-long, 36-inch-diameter welded steel underground pipeline capable of transporting about 1.07 billion cubic feet per day of natural gas from interconnections with existing supply pipelines near Malin; the Klamath Compressor Station; four meter stations; five pig launcher or receiver units; 17 mainline block valves; and a gas control communication system, including 11 radio towers.

The non-jurisdictional facilities associated with the Pacific Connector Pipeline Project include electric lines to the meter stations and compressor station.

In our February 11, 2015 comment letter, EPA identified concerns with the proposed project related to the purpose of the west berth, and the extent to which future Port of Coos Bay (Port) activities may be connected to the proposed slip configuration; information needs related to the siting of the SORSC and

Northpoint Workforce Housing Complex; the potential for impacts to aquatic resources; and plans for long term dredged material management. We also urged the Federal Energy Regulatory Commission to consider the potential for impacts resulting from increased production of natural gas attributable to LNG export facilities.

We appreciate the clarification in the FEIS that a multi-user facility is no longer being considered, and that the proposed action under this NEPA analysis includes a single-use slip and access channel that would solely support LNG operations. We also appreciate the inclusion of additional detail related to the SORSC and Housing Complex, including the discussion of stormwater pollution prevention, and the updated information regarding transportation impacts and the use of offsite parking lots.

With regard to the analysis of how this project would affect natural gas production and potential associated impacts in the U.S., we continue to recommend that the analysis discuss these potential impacts at a conceptual level. In future analyses, we encourage the FERC to broaden the scope of analysis to consider these potential indirect effects, and to incorporate the results of the DOE study "Addendum to Environmental Review Documents Concerning Exports of Natural Gas from the United States."[1]

Finally, we appreciate the modifications to Chapter 2 with regard to material dredged during maintenance dredging, and the inclusion of a condition to work with the EPA and the U.S. Army Corps of Engineers to file with the Secretary a revised Dredged Material Management Plan prior to construction. We do offer one point of clarification as it relates to the following statement on page 2-28 in the FEIS: "…[Site F] is owned by the State of Oregon out to the 3-mile territorial limit, and the remainder by the COE." We believe it fosters confusion to characterize Ocean Dredged Material Disposal Site F as being owned by either the State or the U.S. Army Corps of Engineers. We strongly encourage the FERC to move away from the use of the words "own" or "ownership" in relation to ocean dredged material disposal sites. It would be more accurate to characterize Site F strictly as an EPA-designated ocean dredged material disposal site.

We have appreciated the opportunity to work with FERC and the applicant as a cooperating agency on this EIS. Thank you for considering our input on the final EIS. If I can provide additional explanation of our comments please contact me at (206) 553-1601, or Teresa Kubo of my staff at (503) 326-2859.

Sincerely,

Christine B. Littleton

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit

2 http://www.energy.gov/fe/draft-addendum-environmental-review-documents-concerning-exports-natural-gas-united-states