



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 6**

**1445 Ross Avenue, Suite 1200**

**Dallas, TX 75202-2733**

September 9, 2016

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

Re: OEP/DG2E/Gas 2; Golden Pass Products LLC and Golden Pass Pipeline LLC; Docket Nos. CP14-517-000 and CP14-518-000

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Federal Energy Regulatory Commission (FERC) Final Environmental Impact Statement (FEIS) for the Golden Pass LNG Export Project (Project). The purpose of the Project is to expand the existing terminal and pipeline in order to liquefy and export domestic natural gas to global markets.

EPA provided comments on the Draft Environmental Impact Statement (DEIS) dated May 16, 2016, in which the DEIS was rated as "Environmental Concerns – Insufficient Information" (EC-2). EPA appreciates that the FEIS included additional analysis of the proposed action to address several of our concerns. EPA continues to have concerns regarding impacts analysis of environmental justice communities, indirect effects, greenhouse gas emissions, and wetlands; we are providing comments that we recommend FERC consider before issuing the Record of Decision (ROD) document.

EPA appreciates the opportunity to review the FEIS. If you have any questions or concerns, I can be reached at 214-665-8565, or contact Stephanie Meyers of my staff at [meyers.stephanie@epa.gov](mailto:meyers.stephanie@epa.gov) or 214-665-6469.

Sincerely,

A handwritten signature in black ink that reads "Robert Houston".

Robert Houston  
Chief, Special Projects Section

Enclosures

**DETAILED COMMENTS ON THE  
FEDERAL ENERGY REGULATORY COMMISSION  
FINAL ENVIRONMENTAL IMPACT STATEMENT  
FOR THE GOLDEN PASS LNG EXPORT PROJECT**

**BACKGROUND:** The Golden Pass LNG Export Project consists of the Golden Pass Export Terminal Expansion and the Golden Pass Export Pipeline Expansion. These expansions will involve adding liquefaction facilities at the existing Golden Pass Import Terminal and modifying the existing Golden Pass Pipeline by constructing approximately 2.6 miles of new 24-inch diameter pipeline, associated compressor stations, and appurtenant facilities in order to liquefy and export domestic natural gas to global markets.

**ENVIRONMENTAL JUSTICE**

- EPA continues to recommend that FERC use knowledge of the affected areas to reconcile any differences in tools utilized to assess the minority population in the Project area.
- We recommend discussing the Environmental Justice comments and concerns received during the 45 day comment period and include how they were addressed.
- We also recommend developing a community engagement and outreach plan; stating how outreach was conducted; and documenting community concerns. We also recommend including a discussion on how the concerns will be addressed, and including any agreed mitigation activities in future NEPA documents.

**INDIRECT EFFECTS**

- EPA is aware of the challenges in determining the specific nature and impacts of future natural gas production and development activities, but we continue to recommend discussing these potential impacts at a conceptual level by incorporating the results of the Department of Energy (DOE) study referenced in our May 16, 2016, letter in future NEPA documents.

**GREENHOUSE GAS EMISSIONS**

- EPA continues to recommend discussing the Greenhouse Gas (GHG) emissions associated with the production, transportation, and combustion of the natural gas proposed to be exported by the project, which CEQ defines as appropriate NEPA practice in its recent Guidance. In this and future discussions of climate change in FERC NEPA documents, we recommend that FERC follow the approach outlined by the CEQ's August 1, 2016, Final Guidance on the Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in NEPA reviews. For example, on the topic of direct and indirect GHG emissions, the CEQ guidance states: "If the direct and indirect GHG emissions can be quantified based on available information, including reasonable projections and assumptions, agencies should consider and disclose the reasonably

foreseeable direct and indirect emissions when analyzing the direct and indirect effects of the proposed action.” This could be accomplished for this project by incorporating by reference the two DOE reports referenced in our May 16, 2016, letter and adapting the estimates of emissions from exported gas to fit the volumes to be exported by the proposal.

## **CONSULTATION AND COORDINATION**

- We recommend updating table 1.5-1 to show the most recent status of coordination with federal, state, and local agencies, as well as those recommended by EPA in our May 16, 2016, letter.

## **WETLANDS**

- The evaluation of alternative sites in Section 3.3.1 does not include consideration of laydown areas, pipeline connections, etc. It is unclear why these components must be located where they impact aquatic habitats. Please clarify in the ROD why alternatives are not practicable.
- Procedures for the Wetland Mitigation Plan are not discussed in the FEIS. We recommend including specific methods in the ROD on how this plan will be developed and to coordinate with EPA while the mitigation plan is being developed.
- EPA recommends including quantitative estimates of impacts in the ROD to justify evaluations that other alternatives would result in similar or larger wetland impacts compared to the proposed alternative. We recommend that FERC provide estimates of the number of acres of aquatic habitats, by aquatic habitat type, that would be impacted by all alternatives considered.
- We recommend providing a detailed justification in the ROD as to why meeting the timeline for terminal expansion is crucial to the project.
- Please coordinate with EPA on the procedures for restoration of wetlands impacted during construction and include the procedures in an appendix in the ROD.
- The concentrations of contaminants associated with dredged material, the potential impacts of contaminants, and risks associated with dredged material disposal methods remain a concern to EPA. We recommend the history of dredged material testing and the results be disclosed in the ROD, and that caution be used in making future dredged material disposal decisions.

