To: Allnutt, David[Allnutt.David@epa.gov]
From: Opalski, Dan
Sent: Fri 9/22/2017 12:37:29 AM
Subject: Fwd: Alaska Stand Alone Pipeline CWA 404 elevation letter due Monday 9/25/17

Lee's response...also, by the way, I couldn't get to the draft you tried to send along because I needed access (from Mary Anne, I assume) in sharepoint.

Sent from my iPhone

Begin forwarded message:

> **From:** "Forsgren, Lee" <Forsgren.Lee@epa.gov>
> **Date:** September 21, 2017 at 5:12:28 PM PDT
> **To:** "Pirzadeh, Michelle" <Pirzadeh.Michelle@epa.gov>
> **Cc:** "Shapiro, Mike" <Shapiro.Mike@epa.gov>, "Best-Wong, Benita" <Best-Wong.Benita@epa.gov>, "Opalski, Dan" <Opalski.Dan@epa.gov>, "Greenwalt, Sarah" <greenwalt.sarah@epa.gov>, "Goodin, John" <Goodin.John@epa.gov>, "Eisenberg, Mindy" <Eisenberg.Mindy@epa.gov>
> **Subject: Re: Alaska Stand Alone Pipeline CWA 404 elevation letter due Monday 9/25/17**
>
> Why don't we try to talk at 2:00 pm PDT (5:00 pm EDT).
>
> Lee
>
> Sent from my iPhone
>
> On Sep 21, 2017, at 8:04 PM, Pirzadeh, Michelle <Pirzadeh.Michelle@epa.gov> wrote:
>
>> We should talk tomorrow as the deadline for the letter is Monday September 25th. What time is good for you?
>>
>> Michelle L. Pirzadeh
>>
>> Acting Regional Administrator
>>
>> U.S. Environmental Protection Agency, Region 10

Office: (206) 553-1234

Cell: Ex. 6 - Personal Privacy

Fax: (206) 553-1809

From: Forsgren, Lee
Sent: Thursday, September 21, 2017 4:45 PM
To: Pirzadeh, Michelle <Pirzadeh.Michelle@epa.gov>
Cc: Shapiro, Mike <Shapiro.Mike@epa.gov>; Best-Wong, Benita <Best-Wong.Benita@epa.gov>; Opalski, Dan <Opalski.Dan@epa.gov>; Greenwalt, Sarah <greenwalt.sarah@epa.gov>; Goodin, John <Goodin.John@epa.gov>; Eisenberg, Mindy <Eisenberg.Mindy@epa.gov>
Subject: Re: Alaska Stand Alone Pipeline CWA 404 elevation letter due Monday 9/25/17

Michelle,

I would ask that you not send the 404 (b) letter until we at headquarters have an opportunity to fully review the permit application.

We should probably find some time to talk.

Regards

Lee

Sent from my iPhone

On Sep 21, 2017, at 6:57 PM, Pirzadeh, Michelle <Pirzadeh.Michelle@epa.gov> wrote:

Hello Lee,

I wanted to call this item to your attention from our Region 10 weekly report today to make sure you are aware of our Monday deadline to submit our CWA 404 3(b) elevation letter.

From Region 10 Weekly Report – September 21, 2017

Alaska Stand Alone Pipeline (ASAP): On Monday September 25th, Region 10 plans to submit its second Clean Water Act section 404 elevation letter (3(b)) regarding the ASAP project to the U.S. Army Corps of Engineers Alaska District. EPA sent its first letter, a 3(a) letter, on August 29th. The proposed project is for a 730-mile long natural gas pipeline from the Beaufort Sea to Anchorage, with a lateral line planned for Fairbanks. The pipeline would carry natural gas for domestic consumption and would directly impact 8,907 acres of wetlands and waters, and result in the additional degradation of 1,037 acres of permafrost. The applicant is proposing to purchase 80 wetland credits to offset nearly 10,000 acres of loss. EPA objected to the project as proposed in the Corps' public notice on a number of grounds: The applicant could avoid or minimize thousands of acres of wetland loss by raising the pipeline on vertical support members rather than burying it in a trench; and, the proposed compensatory mitigation is inadequate to offset the losses and does not comply with the regulations or the CWA 404(b)(1) Guidelines.

Please let me know if you have any questions or would like additional information. Our staff have been working closely with staff in the OW Wetlands Division on the letter.

Thank you,

Michelle

Michelle L. Pirzadeh

Acting Regional Administrator

U.S. Environmental Protection Agency, Region 10

Office: (206) 553-1234

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