UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

November 15, 2018

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

Dear Ms. Bose:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Port Arthur LNG and Connector Projects (CEQ No. 20180229) pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations (40 CFR Parts 1500 – 1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The purpose of the proposed action is to construct and operate onshore natural gas liquefaction and associated facilities in Texas to allow the export of liquefied natural gas, and to construct, own, operate, and maintain interstate natural gas pipelines, new compressor stations, and ancillary facilities in Texas and Louisiana. The EPA is a cooperating agency for this project.

EPA's primary concerns are the potential impacts to wetlands. Section 4.4 of the DEIS discusses temporary wetland impacts associated with construction and operation of the proposed action. For scrub-shrub wetlands, the DEIS identifies a timeline of 2 to 4 years to reach functionality similar to preconstruction conditions, and even longer for forested wetlands. Lastly, there are forested wetlands that may be converted into other wetland types. If available at the time the Final Environmental Impact Statement (FEIS) is published, please include the following: compensatory mitigation for each of the impacted wetlands, location of compensatory mitigation sites and demonstration of in-kind or appropriate out-of-kind compensatory mitigation options, the amount of dredge material produced in each area and the projected beneficial use project(s), including location of the dredge placement sites and the resulting acreage produced by the project.

Section 4.9.8.3 identifies the primary project-related health risk associated with an unanticipated failure at the liquefaction terminal, pipelines, or compressor stations. The EPA suggests the FEIS incorporates a map of the population demographics in proximity to the proposed action to further characterize those at potential risk.

Please note that effective October 22, 2018, the EPA no longer includes ratings in our comment letters. Information about this change is explained in the Memorandum on Changes to EPA's Environmental Review Rating Process, available at https://www.epa.gov/nepa/policy-and-procedures-review-federal-actions-impacting-environment-under-section-309-clean-air.

We appreciate the opportunity to provide comments on this document. If you have any questions, please contact Kimeka Price, the lead contact for this project, at (214)665-7438 or price.kimeka@epa.gov.

Sincerely,

Cheryl T. Seager
Director
Compliance Assurance and
Enforcement Division

ec: David Hanobic, FERC, David.Hanobic@ferc.gov