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

August 7, 2018

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

Dear Ms. Bose:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft Environmental Impact Statement (EIS) for the Calcasieu Pass Project (CEQ No. 20180147) pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 C.F.R. Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The purpose of the Calcasieu Pass Project is to construct and operate a natural gas liquefaction and storage facility, marine export terminal, and natural gas pipeline facilities in Cameron Parish, Louisiana. The facilities would have a production capacity of 12 million metric tons of liquefied natural gas (LNG) per annum, and would export the LNG via ocean-going carriers.

The EPA's primary concern is wetlands mitigation. The draft EIS describes wetland types to be impacted as mostly fresh marsh and scrub-shrub wetland types. According to Appendix E, the mitigation credits to be purchased from the South Fork Mitigation Bank are of the coastal prairie wetlands type. Please include information regarding the impacted wetlands soil type in the final EIS that verifies coastal prairie is an acceptable mitigation type for the impacted wetlands. Further, we recommend including the Louisiana Rapid Assessment Method (LRAM) worksheets in the final EIS to assist with reviewing the impacts to wetlands and determining adequate compensatory mitigation. Lastly, it is noted that several consultations with federal and state agencies are ongoing, and many of the permits required for the facility have not been issued. The EPA does however agree with the FERC recommended mitigation measures proposed in the draft EIS, and looks forward to reviewing any new information included in the final EIS.

The EPA has rated the draft EIS as LO, Lack of Objections. Please refer to the enclosed *Summary of Rating Definitions* for a detailed explanation of the EPA's rating system.

We appreciate the opportunity to review and comment on this document. Once completed, please send our office one CD of the final EIS to the address above. If you have any questions, please contact Keith Hayden, the project review lead, at 214-665-2133 or hayden.keith@epa.gov.

Sincerely,

Cheryl T. Seager
Director
Compliance Assurance and
Enforcement Division

Enclosure

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

A. Rating the Environmental Impact of the Action.

LO (Lack of Objections). The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

EC (Environmental Concerns). The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

EO (Environmental Objections). The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;

2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;

3. Where there is a violation of an EPA policy declaration;

4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or

5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

EU (Environmentally Unsatisfactory). The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;

2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or

3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

B. Adequacy of the Impact Statement.

1 (Adequate). The draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

2 (Insufficient Information). The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

3 (Inadequate). The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.

*From EPA Manual 1640: Policy and Procedures for the Review of Federal Actions Impacting the Environment