

**Comment Response Matrix
Interim Draft Environmental Impact Statement for the
Gulf Landing LLC Deepwater Port License Application**

#	Location			Comment	Reviewer	e ² M's Response
	Page	Line	Section			
0	1	10	5.2.1	<i>Remove last sentence in paragraph.</i>	JD	<i>Text revised per comment.</i>
1				<p>Since significant environmental impacts could result from construction onshore of the two concrete gravity base structures and any associated channel excavation required to ship them out of the fabrication yard, these direct impacts should also be evaluated in a single EIS for the entire LNG operation, including the terminal construction and operation as well as the associated pipeline construction.</p> <p>If the terminal fabrication site is in coastal Louisiana, the EIS should document planning to ensure that the proposed project is consistent with Federal and State efforts to restore coastal Louisiana. Although similar issues should be explored if the fabrication site is along the Texas coast, particular attention should be paid to the cumulative impacts analysis should the proposed site be along or near the La Quinta Channel, in Texas. There are currently proposals for three onshore LNG terminals and at least two fabrication sites in that area. Similarly, the Freeport and Sabine-Neches areas are being proposed for multiple LNG-related facilities and the cumulative impacts should be addressed in some detail. In any event, we would expect the EIS to thoroughly address the potential for environmental impacts associated with the onshore facility construction, specifically with respect to dredging (including discussions of alterations to channel width or depth), dredged material management, beneficial use options, and wetlands impacts.</p>	BK	No response to previous inquiry

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2			<p>The impacts of terminal fabrication, including dredging and any wetland impacts are of particular interest to us and should be analyzed in the EIS as direct impacts. We would look for a thorough evaluation in the EIS demonstrating planning efforts to avoid, minimize, and compensate for wetland losses associated with the dredging, dredged material disposal, and construction work. All unavoidable direct and indirect impacts would need to be fully compensated. In sum, the planning for this project must ensure that adverse impacts to coastal wetlands have been avoided to the maximum extent practicable, while also taking advantage of every opportunity for beneficial use of dredged material.</p> <p>Since the project could not possibly proceed in the absence of the terminal fabrication activity, it is certainly more than even a "reasonably foreseeable" effect, described as an indirect effect according to the Council on Environmental Quality <i>Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act</i>. It is, however, an integral and necessary action occurring early in the entire project timeline; terminal construction is a direct effect and would be ripe for environmental analysis and decision-making along with the consideration of terminal operation. It would not be consistent with our interpretation of the CEQ regulations to tier these directly dependent activities. The internal review draft asserts that the fabrication site aspects of the project are not ripe for decision simply because the company has not yet divulged its plans in this regard. That is not the standard by which "ripeness" should be decided.</p>	BK	No response to previous inquiry
3	1-5	New 33	1.3 Is NOAA Fisheries a cooperating agency?	RL	No response to previous inquiry

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4	1-6	6	1.3	EPA Region 6 is also depending on the EIS and consultation documents to meet our statutory and regulatory requirements in reaching a decision to issue or deny the NPDES permit.	RL	No response to previous inquiry
5	1-6	40	1.3	If the scope of the EIS is not changed to reflect comments 2 & 3 above, a declaration of what the EIS is not covering needs to be made so that the public understands that the construction of the GBS units will need to be evaluated under supplemental NEPA review.	RL	No response to previous inquiry
6	2-14	27	2.2.5	Check spelling of "amaller" could be "a smaller"	RL	New item
7	2-15	9	2.2.5	A more thorough discussion of the wedgewire screens is needed as to how the larger 6.5 mm size was selected over the .5 mm. While in the referenced study 2 mm wedgewire screens reported to have a 62% reduction in entrainment over 9.5 mm screens, the interim EIS does not indicate the expected reduction in entrainment by utilizing the 6.35 mm screen. The EIS should indicate the expected marine life exclusion efficiency of the 6.35 mm screen and present a clear rationale for not using a smaller mesh screen (i.e., 2 mm) to minimize impacts to marine fishery species from entrainment. What percent exclusion does the selected system offer over no system?	LG	Does MMS agree with the proposed resolution?

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8	2-18	16	2.2.7	A map of the alternative pipeline routes needs to be added. Table 2-4 lists F, G, & H as alternatives, but does not give any analysis for way these alternatives were discarded. G & H appear to be shorted and have less disturbed acreage. Were they only feasible with alternative F that is much longer and includes greater acreage? I think that these are not in fact alternatives in West Cameron 213, but are alternatives for the West Cameron 183. (See figure 2-9, although F, G & H are not designations on the figure) If so, the alternative pipeline routes should be placed under the WC 183 alternative site discussion.	RL	
9	2-27	16	2.6.1	LNGC Unloading section is merged within the LNGC Berthing discussion.	RL	New Issue
10	2-27	19	2.6.1	How is the LNG moved from the vessel to the terminal? Are the pumps on the vessel and pump the LNG to the terminal or are the pumps on the terminal and withdraw the LNG from the vessel? Might be explained more fully in the air impacts section, but it would be helpful to include the process here as well.	RL	No response to previous inquiry
11	2-30	14	2.6.1	Personnel Quarters section is merged with the Solid Waste and Debris discussion.	RL	New Issue
12	3-2	32	3.1.3.1	How many miles west of the mouth of the Mississippi River?	RL	No response to previous inquiry
13	3-10	3	3.2.1	Please provide a map of the Region of Influence. It is difficult to visualize the potential impact area.	RL	No response to previous inquiry
14	3-15	5 on	3.2.2.1	This paragraph is not germane to the proposed project location. Louisiana is the only state not discussed.	RL	No response to previous inquiry

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15	3-58	38	3.5.2.5	RL	No response to previous inquiry – understand that the no new docking facility will be created for the 4 tugs, but it is contradictory regarding if the tugs currently exist or will constructed expressly to support the LNG facility.
16	3-68	41 on	3.8.1.1	RL	As unresolved, it would be better to delete the sentence.
17	4-5	35	4.1.2.4	LG	No response to previous inquiry
18	4-12	25	4.1.2.5	RL	New Issue
19	4-45	20	4.2.2.4	RL	Resolved one incidence
20	4-54	8	4.4.1	RL	No response to previous inquiry
21	4-76	1	4.8.2.2	SS/ES	*****

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22	4-78	25 on	4.8.2.2	Gulf Landing indicated that the emissions in Tables 4-10 and 4-11 would not exceed the annual MMS emissions threshold limits from 30 CFR 250.303. However, in Table 4-12, the emissions threshold limit for NOx was exceeded. Please clarify.	SS/ES	*****
23	4-78	30 on	4.8.2.2	The language states "no significant adverse impacts on onshore or offshore air quality would be expected from the proposed action." It appears that Gulf Landing did not model a fence-line type concentration level. The modeling only showed shoreline and Lake Charles area modeled impacts. In the past, the perimeter that the Coast Guard would enforce around such a facility is the "fence-line" definition. This analysis needs to be redone with a property line type analysis, because air over domestic surface waters that the source does not control would be considered ambient air, and to ensure that full increment and NAAQS analysis are not required based on this revision in the significance modeling.	SS/ES	*****

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24	4-78 on	30 on	4.8.2.2	SS/ES	*****
25	4-79	9 on	4.8.2.3	SS/ES	*****

The draft EIS indicates that the impacts on the nonattainment area ozone level would be less than 2 ppb based on modeling of a 1993 episode in Southeast Texas. The analysis of the modeling was not done to a level that would conclusively indicate whether or not OCS sources could contribute 2 ppb to a single grid cell exceedance. Therefore, the historical modeling is inconclusive on this issue. Furthermore, a significance level for impacts on ozone levels has not been defined for single point sources. EPA did use 2ppb to determine significance of one state's emissions upon another state in the NOx SIP call, but a significance level for single point sources would likely be less than the 2ppb level used by the NOx SIP call.

It should also be pointed out that Lake Charles area is a former nonattainment area and continues to be a maintenance area that has had exceedances of the 1-hour ozone standard. Additionally, the Beaumont-Port Arthur Area also is a 1-hour nonattainment area. Both of these areas are closer than the Houston and Baton Rouge areas mentioned in the report. A more detailed analysis should be done to make a conclusive determination of non significant impact on ozone levels. The language of non-impact should either be caveated by these issues or be removed.

The modeled impacts are reported for shoreline and Lake Charles, but no isoplots or maps were provided of predicted model concentrations. These documents should be provided to complete the record. The electronic modeling input and output files should also be provided for review and documentation purposes.

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26	4-80	33	4.8.2.7	The draft EIS indicates that air quality impacts will be mitigated using BACT as required through the Title V air permitting process. Title V does not have construction/BACT requirements. These requirements are triggered by the construction permitting program requirements found in 40 CFR 52.21.	SS/ES	*****
27	4-90	9	4.10.2.2	Is this the latest information available? Several of the applicants to the Coast Guard or FERC have discussed the larger vessel size fleet coming on-line.	RL	*****
28	4-91	6	4.10.3	Add colon following include	RL	No response to previous inquiry
29	4-91	14	4.10.3.1	Add colon following include	RL	No response to previous inquiry
30	4-95	4	4.10.6	Add colon following include	RL	No response to previous inquiry
31	4-95	13	4.10.6	Generally, there is an over abundance of references to the Applicant's decision or preference. This EIS is to be the government's work product. An example would be on page 4-91: The Applicant considers ORVs extremely safe.... - well, that is nice, but do we? If so, state it affirmatively: ORVs are extremely safe as no moving parts are in contact with flammable liquids. Suggest a global search on the word Applicant to determine other incidences of this occurrence.	RL	No response to previous inquiry

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32	5-1	38	5.1	RL	Update with the latest information on the number of proposed facilities, including the FERC regulated onshore proposals.
33	5-2	13	5.1	RL	No response to previous inquiry
34	?	?	Appendix G	SS/ES	No response to previous inquiry

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35	?	?	Appendix G	SS/ES	No response to previous inquiry

Reviewer: Please provide your name, title, commercial phone number, and date of comments

EPA Region 6 Reviewers – August 5, 2004

- RL – Rob Lawrence, Sr. Policy Advisor – Energy Issues, 214.665.6580
- BK – Barbara Keeler, Coastal and wetlands program staff, 214.665.6698
- LG – Larry Giglio, NPDES permits staff, 214.665.6639
- SS – Shannon Snyder, Air permits staff, 214.665.3134
- ES – Erik Snyder, Air modeling staff, 214.665.7305

• *Example: JD – John Doe, title, commercial phone number, and date*