July 5, 2022

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

Re: EPA Draft EIS Comments for the Driftwood Pipeline Line 200 and Line 300 Project
Beauregard and Calcasieu Parishes, Louisiana, Docket No. CP21-465-000, 001 and 002,

Dear Secretary Bose:

The Region 6 office of the U.S. Environmental Protection Agency (EPA) has reviewed the Federal Energy Regulatory Commission (FERC) Draft Environmental Impact Statement (EIS) (CEQ Number 20220069) for the Driftwood Pipeline (Driftwood) Line 200 and Line 300 Project located in Beauregard and Calcasieu Parishes, Louisiana. The Draft EIS was reviewed pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations (40 CFR Parts 1500 – 1508), and by our NEPA review authority under Section 309 of the Clean Air Act.

Driftwood proposes to construct and operate dual 42-inch-diameter natural gas pipelines originating near Ragley in Beauregard Parish, Louisiana southward to a proposed receiver facility near Carlyss in Calcasieu Parishes, Louisiana. The Project will impact 192 waterbodies, 169.6 acres of wetland, 304.3 acres of agriculture lands, 163.7 acres of forest and 117.3 acres of pine plantation, 84 acres of open land, and additional residential, industrial, and open lands.

EPA's primary concerns are with the Groundwater impacts, Greenhouse Gas (GHG) Emissions and Air Quality impacts, and Environmental Justice (EJ) impacts. The following detailed comments are provided for your consideration.

**Groundwater Analysis**
Section 4.4.1.4 of the Draft EIS states that the proposed project would likely result in minor impacts. Even though impacts are anticipated to be minor, EPA recommends that the impact be quantified. EPA also recommends FERC develop a plan to monitor the impact of trench dewatering.

We recommend that the scope of Horizontal Directional Drill Contingency and Fluid Monitoring Plan include procedures to address contamination when it is detected in situations where waterbodies being crossed changes from imperceptible to perceptible flow.

**Greenhouse Gas Emissions and Air Quality Impacts**
EPA’s detailed comments include recommendations for consistent disclosure and consideration of upstream and downstream emissions and analyzing GHG emissions in the context of national GHG reduction policies and state reduction targets. Our comments also disclose the climate
impacts by using the estimated social cost of GHGs, improving the application of mitigation measures, incorporating climate adaptation, and considering climate-related EJ.

- EPA recommends that FERC avoid solely expressing project-level emissions as a fractional percentage of national or state emissions or reduction targets. This approach trivializes substantial project-scale GHG emissions and is also misleading given the nature of the climate policy challenge to reduce GHG emissions from a multitude of sources, each making relatively small individual contributions to overall GHG emissions. EPA recommends that the EIS include a discussion of whether these increases are consistent with the State plan and in conjunction with the cumulative impacts of the numerous other Liquified Natural Gas (LNG) and pipeline development projects in the State. EPA recommends that NEPA documents discuss the conflict between GHG emissions and national, state, and local GHG reduction policies and goals, and ways that these contributions can potentially be mitigated.

- The Draft EIS does not quantify the upstream and downstream emissions associated with natural gas production and use. Both upstream and downstream GHG emissions are clearly reasonably foreseeable indirect impacts for Natural Gas Act (NGA) section 3 projects. Whether downstream GHG emissions occur within the United States or outside of the United States is not relevant in assessing their climate impacts, given that GHGs have impacts that are global in scale. Whether a project serves domestic consumption or export would not meaningfully affect the location of upstream GHG emissions, which in most cases would be from domestic sources. Given the reasonably close causal relationship between upstream and downstream emissions and FERC’s authorization role under the NGA for section 3 projects, FERC should usefully disclose and consider, in its NEPA and NGA analyses, the often large-scale upstream and downstream emission impacts of NGA section 3 projects. Additionally, because the expected life of the terminal and pipeline facilities is decades long, this project would effectively lock-in the production of the gas needed to support operation at the facility’s certificated capacity. In other words, the purpose of the proposed project is to liquify natural gas for transport and consumption, and that natural gas must be produced and will presumably be used.

**Adaptation and Resiliency of Project to Climate Impacts**

- EPA recommends the EIS consider and disclose climate resilience and adaptation planning in the project design, including measures to be taken to ensure resilience to protect the infrastructure investment from the effects of climate change (on the project). The long-lived nature of LNG infrastructure makes consideration of the ongoing and projected impacts of climate change even more important. Considering potential climate change impacts helps ensure that investments made today continue to function and provide benefits, even as the climate changes. EPA recommends that the EIS specifically discuss how climate resiliency has been considered in the design of the proposed action and alternatives, and any related measures to protect against impacts from increased flooding, etc., should be discussed and included, as appropriate, in the conclusion and recommendations section, as well as any impacts these measures could have on surrounding communities. Consideration of these impacts might help avoid infrastructure investments in vulnerable locations, and unintended impacts on local communities.
**Social Cost of Greenhouse Gases – SC-GHG**

- To more fully assess climate impacts and help weigh their significance in cost-benefit balancing for a proposed project, EPA strongly recommends FERC disclose climate damages and benefits through the use of the Social Cost of GHG (SC-GHG). Such estimates reflect the best available science and methodologies to monetize the value of net changes in direct and indirect GHG emissions resulting from a proposed action to society. The estimates provide the decisionmakers and public meaningful information on the impacts of the project’s GHG emissions for NEPA purposes including disclosing GHG impacts and benefits of mitigation and for comparison across alternatives. While FERC did not provide estimates for the reasonably foreseeable indirect emissions from upstream natural gas production and downstream natural gas production, EPA notes that those emissions may be significant, and should be estimated and their impacts monetized using the SC-GHG.

**GHG and Air Quality Mitigation**

- EPA encourages FERC to routinely adopt all practicable GHG mitigation measures, even where project benefits outweigh adverse environmental impacts, given the reasonableness of such measures from a public interest and necessity standpoint. We recommend that FERC consider practicable mitigation measures from Natural Gas STAR and Methane Challenge programs to reduce any potential GHG emissions attributable to the project. EPA also recommends that FERC incorporate such mitigation measures into the proposed terms and conditions required as part of certificate issuance. Potential mitigation options for FERC to consider for this proposed action include, but are not limited to, methane reduction activities to reduce emissions through several technologies and practices such as:
  
  - Route gas to a compressor or capture system for beneficial use; including routine venting from condensate storage tanks;
  - Using work practice standards and equipment types that minimize leaks and venting, including ultrasonic flow meters and low bleed pneumatic devices;
  - Operate storage wells below fracture pressure;
  - Perform routine leak detection at all compressor seals and wellhead components; and
  - Utilize hot tapping, a procedure that makes a new pipeline connection while the pipeline remains in service, flowing natural gas under pressure, to avoid the need to blow down gas.

More information on these and other potential mitigation measures may be found at [https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions](https://www.epa.gov/natural-gas-star-program/recommended-technologies-reduce-methane-emissions)
Environmental Justice Analysis

Cumulative Impacts on EJ Communities

EPA recommends that FERC reevaluate the conclusion that the projects cumulative impacts on communities with EJ concerns are less than significant, due to vague reasonings. FERC states the project will inundate the identified EJ communities with nine (9) other FERC-regulated natural gas projects all proposed to occur within the same footprint of the Line 200 and Line 300 Project. If FERC determined the Driftwood Line 200 and Line 300 Project will have impacts on the communities from air emissions (where an air permit is required), noise, potential flooding, socioeconomics, traffic, and GHG, the cumulative effect of additional 9 FERC projects and five non-jurisdictional projects would be significant and disproportionately high and adverse. Also, depending on the construction method used, waterbody crossings for pipeline placement of all the natural gas projects could induce flooding, especially since the Project area is already prone to flooding from rain events and storm surges associated with hurricanes. Since the proposed Project will cause increase in the cost of living for individuals already struggling to survive and already dealing with health issues associated with existing energy facilities/projects, the Project will create a disproportionate and adverse impact socioeconomically, individually, and cumulatively.

Impacts of Route Variation

In the Draft EIS, FERC evaluated a route variation that would impact four fewer landowners, would impact predominately agricultural and open land, and reduce forested impacts by 70 percent and forested wetland impacts by 60 percent but concluded that Route Variation Two does not meet landowners stated interests or provide a significant environmental advantage over the proposed route and we do not recommend it.

We recommend FERC incorporate a concise discussion in the EIS regarding how and if the route Variation Two could reduce or avoid adverse impact to the EJ communities with concerns.

Impacts of Collocation of Natural Gas Projects

Due to the numerous FERC natural gas projects collocated in the same areas, EPA recommends FERC develop a contingency plan as a mitigation measure for the impacted communities in case of explosion, pipeline failure/fires, and/or any other health and safety matter.

We appreciate the opportunity to review the Draft EIS and are available to discuss our comments. Please send our office an electronic copy of the Final EIS when it is electronically filed with the Office of Federal Activities using the following link: https://www.epa.gov/nepa/e-nepa-guide-registration-and-preparing-eis-electronic-submission. If you have any questions, please contact Gabe Gruta, project review lead at 214-665-2174 or gruta.gabriel@epa.gov.

Sincerely,
WILLIAM HAYDEN
for Robert Houston
Staff Director
Office of Communities, Tribes and Environmental assessment