

# Consider The Environmental Impacts Before Writing the Environmental Statement

John E. Sherman

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## Abstract

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So, Let's take a look two actual Washington State SEPA EIS published 1) *Tacoma PSE Proposed Tideflats LNG Facility* and 2) Plymouth

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“Purpose of checklist: The State Environmental Policy Act (SEPA), ... requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.”<sup>1</sup>

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<sup>1</sup> See, WASH. ADMIN. CODE § 197-11-960: *Environmental Checklist*, online at <http://apps.leg.wa.gov/wac/default.aspx?cite=197-11-960> (visited Jan. 26, 2016).

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23 **1 Is the SEPA process EIS findings really**  
24 **comprehensive?**

25 *One could say*, some factors of the actual EIS are just-a-little lacking  
26 within the public presentation documents; *for example*, we know some  
27 more detail analytical thoughts about subject:

- 28 1. Methane and natural gas?
- 29 2. Not in my neighborhood for the plant operation, consider the risks?
- 30 3. History, Washington State, natural gas accident (2014)?
- 31 4. Tacoma SEPA EIS: *PSE Proposed Tideflats LNG Facility* presents  
32 what for safety and health?
- 33 5. Plymouth Wash. SEPA EIS for natural gas plant that had accident  
34 presented just what with-words within its SEPA EIS?

35 *In this case*, well take a look at some comparative information and let the  
36 readers determine their own inferences from this information.

## 37 2 The natural gas study stuff just absent

38 Washington, D.C. Environmental, public interest, and  
39 community groups are calling on the Federal Energy  
40 Regulatory Commission (FERC) to go back to the drawing  
41 board today following the release of the agency's Environmental  
42 Assessment (EA) of a controversial proposal to export liquefied  
43 natural gas (LNG) from Cove Point, Maryland, just 50 miles  
44 from the White House. <sup>2</sup>

45 *One example*, some people just don't like natural gas plants operating  
46 within their community neighborhoods because all hazards don't seem to  
47 be disclosed quite yet.

## 48 3 Let's review the methane gas

49 2. It also makes no sense to export natural gas around the  
50 world. This is a live issue: Protesters rallied this month at  
51 Cove Point in Maryland, site of one of many new proposed  
52 terminals for exporting liquefied natural gas from US shale. If  
53 they all get built, our exports will grow 14-fold by 2020. Such  
54 plans, because they will make big money, have powerful  
55 backers: When Heather Zichal left her post as the Obama  
56 administration's climate czar, she accepted a \$180,000-a-year  
57 position on the board of the country's biggest gas exporter.

58 But the math doesn't work at all. When you chill and  
59 rewarm natural gas for shipping, leaks multiply. A study this  
60 spring from the Department of Energy even using leak rates we  
61 now know to be too conservative found that shipping natural  
62 gas to China and burning it instead of coal would mean no  
63 improvement for the climate. <sup>3</sup>

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<sup>2</sup> See generally, Hohenstein, Emma., *Groups Slam Federal Regulators over Flawed Environmental Review of Cove Point LNG Export Facility*, (Mar. 15, 2014), (Earthjustice), online at <http://bit.ly/10Z5AJX> (visited Jan. 27, 2016).

<sup>3</sup> See generally, McKibben, Bill. *Bad News for Obama: Fracking May Be Worse Than Burning Coal*, (Mother Jones) (Sept. 8, 2014), <http://www.motherjones.com/environment/2014/09/methane-fracking-obama-climate-change-bill-mckibben> (visited Jan. 27, 2016).

64 **4 Past Washington State natural gas accident**  
65 **has happened**

66 Nearly 1,000 area residents and agricultural workers were  
67 displaced Monday following a liquefied natural gas (LNG)  
68 explosion at a plant near the Washington-Oregon border.

69 According to the Tri-City Herald, hazardous materials  
70 experts believe the Monday morning explosion at Northwest  
71 Pipeline caused the slow leak of cold LNG from a  
72 14.6-million-gallon storage tank that was struck by shrapnel.  
73 While a statement from Williams Partners, owner of the  
74 Plymouth, WA plant, states that the majority of the evacuees  
75 were allow to return to their homes by 8 p.m. Pacific Standard  
76 Time, the Heralds report indicates that officials have yet to end  
77 the evacuation.

78 Highway and rail line traffic also was shut down near the  
79 Columbia River. “This is considered a large leak,” said Joe  
80 Lusignan, a Benton County Sheriffs Office spokesman.

81 ...

82 The Washington Utilities and Transportation Commission  
83 will also investigate the incident. The Commission last  
84 evaluated the facility in November a “clean inspection,”  
85 according to David Lykken, the commissions director of  
86 pipeline safety, who said there were no violations.

87 According to The Associated Press, the facility provides  
88 supplemental gas when demand rises for a 4,000-mile pipeline  
89 that extends from the Canadian border to southern Utah.

90 Just last week, an LNG terminal at Coos Bay, OR received  
91 federal approval. The terminal would be supplied by the  
92 proposed 235-mile-long Pacific Connector pipeline, crossing  
93 public and private land in southern Oregon to connect to  
94 existing pipelines from British Columbia to California. <sup>4</sup>

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<sup>4</sup> See, Baker, Brandon., *Large LNG Explosion Displaces Hundreds in Washington*, (EcoWatch: Energy, Liquefied Natural Gas:), (Apr. 1, 2014), online at <http://ecowatch.com/2014/04/01/lng-explosion-washington/> (visited Jan. 27, 2016).

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95 **5 Tacoma PSE Proposed Tideflats LNG Facility**  
96 **EIS**

97 3.13.7 Health and Safety The construction and operation of  
98 the Project, PTT, and NWIW methanol facility could have  
99 significant cumulative impacts on health and safety. Although  
100 available information as to the construction and operational  
101 plans of the PTT and NWIW methanol facility is limited, it is  
102 reasonable to assume that these facilities, as well as the  
103 Project, would comply with applicable local, state, and federal  
104 safety regulations and implement plans and measures to limit  
105 safety risks. However, the addition of both the Project and the  
106 NWIW methanol facility does present a cumulative higher risk  
107 of fire and explosion.<sup>5</sup>

108 *3.13.7.2 Operation Impacts* Potential safety hazards at the  
109 Tacoma LNG Project relate to the specific characteristics of  
110 LNG and the conditions under which it would be handled and  
111 stored and to associated operations that involve the use of  
112 other hazardous materials. Operation of the proposed facility  
113 would not pose a potential public hazard because PSE would  
114 adopt and implement strict design and operational measures to  
115 control potential accidents. Stringent requirements would be  
116 put into place for the design, construction, operation, and  
117 maintenance of the facility as well as extensive safety systems  
118 to detect and control potential hazards. More specifically,  
119 design, construction, and operation of the Tacoma LNG  
120 Project would meet the safety requirements of the Pipeline and  
121 Hazardous Materials Safety Administration, the United States  
122 Coast Guard (USCG), and the Washington Utilities and  
123 Transportation Commission. (See, e.g., 33 CFR 127  
124 [Waterfront Facilities Handling Liquefied Natural Gas and  
125 Liquefied Hazardous Gas]; 49 CFR 193 Subpart F [Liquefied  
126 Natural Gas Facilities: Federal Safety Standards]; and National  
127 Fire Protection Association 59A. Additionally, PSE would

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<sup>5</sup> See, *Final Environmental Impact Statement*, (Sept. 30, 2015), (document, Revised) (2015) (City of Tacoma) (SEPA EIA final) online at <http://bit.ly/20511qP> (Jan. 27, 2016) (§ 3.13.7 *Health and Safety*, at p. 3.13-11).

128 adopt and implement strict emergency protocols and health  
129 and safety mitigation measures as set forth in Section  
130 3.5.(Human Health and Safety)

131 **No data on the potential health and safety impacts**  
132 **associated with the operation of the PTT are available.**  
133 **It is reasonable to assume that the PTT project would**  
134 **adhere to all applicable local, state, and federal health**  
135 **and safety laws. Nonetheless, certain health and safety**  
136 **risks can reasonably anticipated. . . .** (emphasis added to  
137 original) <sup>6</sup>

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<sup>6</sup> See id., (§ 3.13.7.2, p. 3.13-11-12)

138 **6 Plymouth Wash. had a accident and SEPA**  
139 **EIA done?**

140 *One could say,* The Washington State SEPA EIA process has no new  
141 learning created by past natural gas accidents.

142 **6.1 Plymouth Washington 2014 LNG accident news**

143 *As a result,* people affected because of this natural gas accident in  
144 Washington State, *but,* ironic that the Tacoma *PSE Proposed Tideflats*  
145 *LNG Facility* SEPA final EIS failed to do a good job referencing this 2014  
146 LNG facility accident?

147 The liquefied natural gas (LNG) facility explosion that  
148 rocked a Plymouth, WA, community on Monday, March 31, has  
149 Lusby residents demanding answers about a proposed  
150 expansion that would enable the Dominion Cove Point liquefied  
151 natural gas terminal to become an LNG export facility. The  
152 incident should also reignite debate on the Federal Energy  
153 Regulatory Commissions (FERC) role as a sole siting authority  
154 and safety regulator, given the agencies apparent ongoing  
155 failure to fully consider the worst-case, compound safety risks  
156 of locating LNG facilities within close proximity to peoples  
157 homes.<sup>7</sup>

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<sup>7</sup> See, *In Light of Washington LNG Explosion, Community Demands Answers to Cove Point Export Terminal Concerns*, (2016) (EcoWatch: Energy, Liquefied Natural Gas), online at <http://ecowatch.com/2014/04/07/after-lng-explosion-community-cove-point-export-concerns/> (Jan. 27, 2016); See also *Pipe explodes at Williams LNG facility in Washington state*, (Mar. 31, 2014), (A pipeline within a liquefied natural gas facility exploded in a rural area of Washington state on Monday and emergency workers continued to work into the evening to minimize the risk of further blasts from a leaking storage tank)online at <http://www.reuters.com/article/williamspartners-natgaspipe-fire-idUSL1NOMS1S620140331>; and, Reuters. 2014. *Blast at U.S. LNG Site Casts Spotlight on Natural Gas Safety*, (Apr. 6, 2014), online at <http://www.reuters.com/article/us-lng-blast-analysis-idUSBREA3506Y20140406>. (visited Jan. 27, 2016).

158 **6.2 The Plymouth EIS say what before accident?**

159 *Despite*, my search for Wash. Ecology Department SEPA EIS for the  
160 Plymouth LNG; *as a result*, I failed to find the direct EIA document to the  
161 LNG facility; *so*, let's just look at some typical environmental statements  
162 from this accident area relating to natural gas; *for example*, one found:

163 **A. Certificate Policy Statement**

164 24. We find that the proposal will not result in any  
165 negative impacts on landowners and communities. The  
166 Northwests proposed construction will take place entirely  
167 within the boundaries of Northwests existing Plymouth LNG  
168 Plant on land that has previously been disturbed, graded, and  
169 graveled . Northwest states that it owns or controls all of the  
170 surface property necessary to construct and operate the  
171 proposed Blue Water LNG Meter Station . All of the  
172 landowners within one - half mile of the Plymouth facilities  
173 were informed of the construction and operation of the Blue  
174 Water LNG Meter Station . None of them participated in the  
175 Commissions certification proceeding. <sup>8</sup>

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177 File: t20160126b.tex : L<sup>A</sup>T<sub>E</sub>X 2<sub>ε</sub> : (Wednesday, January 27, 2016  
178 14:19)

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<sup>8</sup> See, 145 FERC 61, 029 UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION Before Commissioners: Jon Wellinghoff, Chairman; Philip D. Moeller, John R. Norris, Cheryl A. LaFleur, and Tony Clark. Northwest Pipeline GP Docket No. CP13 - 160 - 000 ORDER ISSUING CERTIFICATE (Issued October 9, 2013), (CP13-160-000 Northwest Pipeline GP - 20131009114906-CP13-160-000.pdf.) online at <http://www.ferc.gov/CalendarFiles/20131009114906-CP13-160-000.pdf> (visited Jan. 27, 2016).