

FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:

OEP/DG2E/Gas 1

Long Beach LNG Import Project

Docket No. CP04-58-000, et al.

§ 375.308(x)

January 18, 2008

Thomas E. Giles, Executive Vice President

SES Terminal, LLC

301 East Ocean Boulevard, Suite 1510

Long Beach, CA 90802

Re: **Environmental Information Request**

Dear Mr. Giles:

Please provide the information described in the enclosure to enable my staff to continue its environmental review of the Long Beach LNG Import Project, address information needs identified by the U.S. Coast Guard, and provide an update on SES Terminal, LLC's (SES) access to and control of its project site.

File your response in accordance with the provisions of the Commission's Rules of Practice and Procedure. In particular, Title 18 Code of Federal Regulations (CFR) Part 385.2010 (Rule 2010) requires that you serve a copy of the response to each person whose name appears on the official service list for this proceeding.

**Please file a complete response within 30 days of the date of this letter.** The response must be filed with the Secretary of the Commission at:

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First St., N.E., Room 1A  
Washington, DC 20426

If certain information cannot be provided within this time frame, please indicate which items will be delayed, and their projected filing dates.

When filing documents and maps, be sure to prepare separate volumes, as outlined on the Commission's web site at <http://www.ferc.gov/help/filing-guide/file-ceii/ceii-guidelines.asp>. Please note that the Commission's Order 702, effective December 14, 2007, modified the regulations pertaining to the filing of Critical Energy Infrastructure Information (CEII). Among other changes, the Non-Internet Public category has been eliminated. Any CEII material should be filed as non-public and labeled "**Contains Critical Energy Infrastructure Information – Do Not Release**" (18 CFR 388.112). Cultural resources material containing location, character, or ownership information should be marked "**Contains Privileged Information - Do Not Release**" and should be filed separately from the remaining information, which should be marked "**Public.**"

File all responses under oath (Title 18 CFR Part 385.2005) by an authorized representative of SES and include the name, position, and telephone number of the respondent to each item.

For all materials submitted, please provide an electronic copy and one hard copy directly to the environmental project manager. In addition, provide electronic and hard copies directly to each of the representatives of our cooperating agencies: LCDR Peter Gooding of the U.S. Coast Guard, Sector Los Angeles-Long Beach; and Antal Szijj of the U.S. Army Corps of Engineers. Also provide an electronic copy and two hard copies directly to our third-party environmental contractor, Natural Resources Group, Inc. Thank you for your cooperation. If you have any questions, please call Rich McGuire, the environmental project manager, at 202-502-6177.

Sincerely,

Lauren O'Donnell, Acting Director  
Division of Gas-Environment and  
Engineering  
Office of Energy Projects

Enclosure

cc: Public File, Docket No. CP04-58-000, et al.

All Parties

Tetsuko Egawa  
Manager, Permitting and Regulatory Affairs  
SES Terminal, LLC  
301 East Ocean Boulevard, Suite 1510  
Long Beach, CA 90802

Jim Nickerson  
Tetra Tech  
3311 270<sup>th</sup> Street  
Logan, IA 51546

Amy Davis  
Natural Resource Group, Inc.  
1000 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402

Lieutenant Commander Peter Gooding  
U.S. Coast Guard  
Sector Los Angeles-Long Beach  
1001 S. Seaside Ave  
San Pedro, CA 90731

Antal Szijj  
US Army Corps of Engineers  
2151 Alessandro Drive  
Suite 110  
Ventura, CA 93001

ENCLOSURE

**SES Terminal LLC (SES)  
Docket No. CP04-58-000, et al.  
Long Beach LNG Import Project  
ENVIRONMENTAL INFORMATION REQUEST**

1. Provide:
  - a. a color navigational map(s), in 8-inch by 11-inch format, that shows the entire liquefied natural gas (LNG) vessel transit route from the time the vessel enters the Vessel Traffic System of Los Angeles – Long Beach to the proposed LNG terminal location and adjacent shorelines; and
  - b. a graphic overlay on the LNG vessel transit map illustrating the following “Zones of Concern”<sup>1</sup> from the center of the vessel route to each shoreline:
    - (1) zone 1: heat flux of 37.5 kilowatt (kW)/per square meter (m<sup>2</sup>) produced by a pool fire - extending out to about 500 meters (0.3 mile) from the channel;
    - (2) zone 2: heat flux of 5 kW/m<sup>2</sup> produced by a pool fire - extending out to about 1,600 meters (1 mile) from the channel; and
    - (3) zone 3: a flash fire from a vapor cloud - extending out as far as 3,500 meters (2.2 miles) from the channel.
  - c. On the LNG vessel transit map, where applicable and feasible, indicate the locations of the sensitive environmental sites/areas listed below. Much of this information has already been provided by SES for the immediate area surrounding the terminal but the information was not in graphic form and did not adequately cover all of the “Zones of Concern.”
    - (1) population density (as defined in enclosure 2 of NVIC 05-05);
    - (2) shellfish nurseries;

---

<sup>1</sup>The “Zones of Concern” are described in Enclosure 11 of the U.S. Coast Guard’s Navigation and Vessel Inspection Circular (NVIC) 05-05. These zones are based on the report *Guidance on Risk Analysis and Safety Implications of a Large Liquefied Natural Gas (LNG) Spill Over Water*, December 2004 (SAND2004-6258) prepared by Sandia National Laboratories. If use of larger-sized LNG vessels (greater than 148,000 cubic meter cargo capacity) is anticipated, please use zones resulting from an analysis of larger-sized vessels based on a methodology approved by the U.S. Coast Guard.

- (3) critical habitat, migration routes, feeding/breeding grounds of federally listed and/or state-listed endangered or threatened species;
- (4) migration routes, major feeding/breeding grounds for marine mammals;
- (5) wetland areas;
- (6) marine sanctuaries;
- (7) wildlife refuges/sanctuaries;
- (8) migratory bird feeding/breeding grounds;
- (9) state and National Parks;
- (10) tribal lands/tribal fishing areas (treaty rights fishing areas);
- (11) coral reefs;
- (12) marine protected areas;
- (13) essential fish habitats; and
- (14) any other natural area or known population of a wildlife species protected by environmental law or Executive Order or designated environmentally sensitive by an environmental agency of the federal, state, or local government.

If more than one map is necessary, all maps should contain the LNG vessel transit route with appropriate “Zones of Concern” overlays.

2. Provide a written description of the entire LNG vessel transit route from the outer limit of the Vessel Traffic System of Los Angeles – Long Beach to the proposed location for the LNG terminal, including adjacent shorelines, discussing the existing human, aquatic, and terrestrial resources that may be impacted by LNG vessel transit or an ignited or unignited LNG spill (appropriate impact levels based on Sandia’s “Zones of Concern” should be used). A higher level of resource description should be provided for environmentally sensitive areas, while a more general discussion of non-sensitive resources along the route is acceptable. If the LNG vessel transit route or a portion of the route is so far from the shoreline that shoreline habitats would not be impacted, a statement to this effect can be made and justified and a detailed analysis of the shoreline need not take place. However, an explanation of why LNG vessel steering problems would not result in impacts on the shore should be provided (i.e., waterway is too shallow to allow for the vessel to come into damaging proximity to shore). Similarly, for aquatic, air, and other resources, if they would not be affected, a statement to that effect along with a short explanation will suffice. Describe the affected environment for the following aspects of the waterway/shoreline listed below. If any of these aspects are not applicable, include a specific statement to that effect.
  - a. sensitive soils and the potential for LNG vessel transit to cause shoreline erosion;

- b. water quality (based on the U.S. Environmental Protection Agency water quality database of coastal waters);
- c. wetland areas;
- d. locks, bridges, or other man-made obstructions in the waterway;
- e. tidal range;
- f. protection from high seas;
- g. natural hazards including reefs, rocks, and sandbars;
- h. distance of berthed vessels from the channel and the width of the channel;
- i. current safety measures already in place for vessel traffic, and specifically for vessels carrying hazardous cargo;
- j. any existing maintenance dredging;
- k. shellfish nurseries;
- l. federally endangered or threatened species and their critical habitat, migration routes, and feeding/breeding grounds;
- m. state endangered or threatened species and any critical habitat, migration routes, and feeding/breeding grounds;
- n. marine mammals, and their migration routes, and major feeding/breeding grounds;
- o. marine sanctuaries;
- p. wildlife refuges/sanctuaries;
- q. migratory bird feeding/breeding grounds;
- r. coral reefs;
- s. marine protected areas;
- t. essential fish habitats;
- u. other aquatic and terrestrial wildlife along the route (general discussion of non-sensitive wildlife is acceptable);
- v. any other natural area or wildlife species protected by environmental law or Executive Order or designated environmentally sensitive by an environmental agency of the federal, state, or local government;
- w. passage through designated coastal zone areas;
- x. populated areas (numbers of people should be discussed along with designation of rural or urban population and density of population);
- y. any minority or low income populations that might be adversely and disproportionately impacted should be discussed;
- z. critical infrastructure (i.e., nuclear power plants, refineries, major bridges and tunnels, major ports or industrial areas of importance);
- aa. state and National Parks;
- bb. general description of historic districts and buildings, known archaeological sites and sites that are listed or eligible for listing on the National Register of Historic Places, traditional cultural properties, and any National Historic Landmarks;
- cc. tribal lands/tribal fishing areas (treaty rights fishing areas);

- dd. ship emissions and their impact on air quality issues along route, that would trigger permits or require a General Conformity analysis; and
  - ee. noise quality.
3. For all of the applicable environmental resources listed in item 2, discuss the consequences and impacts of LNG vessel transit and operation and potential impacts of an ignited or unignited LNG spill from either an accident or intentional attack (using appropriate “Zones of Concern”) along the entire LNG vessel transit route. A higher level of impact analysis should be provided for environmentally sensitive areas and a more general discussion of non-sensitive resources along the route is acceptable. As mentioned above, detailed discussions are not necessary if specific resources would not be impacted. For each resource impacted, state SES’ opinion as to the environmental significance of such impacts before and after mitigation (based on the Council on Environmental Quality definition of significance stated at Title 40 CFR Part 1508.27). In addition to the resources listed in items 2a-ee, be sure to address:
- a. impacts of LNG vessel transit on other marine traffic on the waterway for both commercial and recreational vessels (time delays, safety issues, any economic impacts); and
  - b. impacts of LNG vessel transit on maritime safety issues (i.e., vessel transit during tides, protection from high seas, natural hazards including reefs, rocks, sandbars, and manmade obstructions).
4. Update the marine traffic study conducted in your initial filing, and include a description of the density and character of marine traffic on the waterway (average number of vessels using the waterway per day and types of vessels) and importance of vessel transit routes to commercial vessels (i.e., economic) and recreational vessels.
5. Provide a color navigational map(s), in 8-inch by 11-inch format, that shows the entire LNG vessel transit route in relation to U.S. Navy operations.
6. Update the status of SES’ efforts to gain access to and control of its proposed terminal site since receiving the January 22, 2007 letter from the Executive Director of the Port of Long Beach informing SES that the Board of Harbor Commissioners declined to lease the proposed LNG import facility site.
7. Demonstrate how SES would obtain the required legal/governmental control over the activities that occur within the portions of the thermal radiation exclusion zones that fall outside of the proposed site property line which are necessary to meet the federal safety requirements at Title 49 CFR Part 193.

8. Please provide all geotechnical data and seismic design information prescribed in the Commission's "*Draft Seismic Design Guidelines and Data Submittal Requirements for LNG Facilities*", January 23, 2007 {<http://www.ferc.gov/industries/lng/lng-seis-guide.pdf>} that has not previously been submitted. For any relevant information that has been submitted already, please provide the filing date.