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October 31, 2007

Via Electronic and Overnight Mail

Roddy C. Bachman, U.S. Coast Guard
Linda Moore, City of Los Angeles
c/o Department of Transportation
Docket Management Facility
1200 New Jersey Avenue, SE.,
West Building, Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Docket Number USCG-2007-26844

Dear Mr. Bachman and Ms. Moore:

Clearwater Port LLC (a subsidiary of NorthernStar Natural Gas Inc., hereinafter "Clearwater") appreciates the opportunity to provide the following comments to help identify and refine the scope of the environmental issues to be addressed in the Environmental Impact Statement / Environmental Impact Report ("EIS/EIR") for the Woodside Oceanway Secure Energy Project ("Woodside" or "Oceanway"). As discussed below, Clearwater's interest in commenting on the Oceanway project is to emphasize the need for "Permitting Parity," the equal treatment of similarly situated projects with different California lead agencies.

As you may know, Clearwater is proposing to construct Clearwater Port, an offshore LNG receiving terminal and regasification facility located approximately 12.6 statute miles off the coast of Oxnard, California.¹ The project involves the installation of two parallel floating docks (berthing facilities) for mooring of LNG carriers, an LNG offloading and transfer system, the conversion of the existing Platform Grace into a regasification facility, installation of a new pipeline primarily within an existing offshore pipeline corridor to bring the gas to shore at an existing industrial facility, and delivery of gas into the existing Southern California Gas Company (SoCalGas) pipeline infrastructure via a series of new onshore pipelines.

While Clearwater Port and Woodside's Oceanway projects are both offshore California LNG projects, the two projects will follow permitting paths that are similar but not identical. On the one hand, in terms of federal review, the U.S. Coast Guard and the U.S. Maritime Administration ("MARAD") will act as the lead federal agencies for purposes of compliance with the National Environmental Policy Act ("NEPA"). On the other hand, the Clearwater Port

¹ USCG Docket Number 28676. Available at <http://www.regulations.gov/fdmspublic/component/main>

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and Woodside's Oceanway will have separate and distinct state lead agencies for purposes of compliance with the California Environmental Quality Act ("CEQA"). For Clearwater Port, the California State Lands Commission ("CSLC"), the agency with jurisdiction over ungranted state tidelands, will be the lead agency. For Woodside's Oceanway project, the City of Los Angeles, the grantee of certain former State tidelands near LAX, will serve as the CEQA lead agency.

Although Clearwater Port and Woodside's Oceanway will follow slightly different permitting paths with different State lead agencies, the substantive provisions of law in general, and the substantive provisions of NEPA and CEQA, in particular, apply equally to both projects. In simplest terms, the substantive requirements of law are unaffected by lead agency designations.

Due process, fundamental fairness, equal protection, and the public's faith in the integrity of the process all dictate that similarly situated applicants, like Clearwater and Woodside, receive similar treatment from the governmental agencies processing their applications under NEPA and CEQA. We refer to this equal, non-discriminatory treatment of similarly situated entities as "Permitting Parity."

The primary purpose of these comments is to ensure Permitting Parity, regardless of which entity serves as the State lead agency under CEQA. Clearwater respectfully submits that Permitting Parity will require the agencies to remain diligent in measuring each project by the same NEPA and CEQA yardsticks.

For example, NEPA and CEQA require a detailed project description that analyzes the whole of the action and avoids piecemealing of a project. In the case of Clearwater, the project design capacity has been clear and unambiguously identified for analysis in the application and confirmed via scoping. In the case of Woodside, Permitting Parity means that the lead agencies will need to analyze the whole of the project: "The full development will have 2 RLNGCs [shuttle supertankers] and 3 tie-in points [with the SoCalGas system]." (Woodside Application, P. 2-1.) Notwithstanding any stated intent to develop the project in "phases," Permitting Parity requires Woodside, like Clearwater, to examine the potential impacts associated with its full contemplated build out: two RLNGCs shuttle supertankers, two buoys, three locations for ship-to-ship transfers ("STS")², RLNGC offshore operating waiting areas, the "conventional LNGCs" mooring and STS operations (including hotelling, cooling water needs and air emissions) in the lightering areas, two pipelines, and three SoCalGas Interconnects with associated additional pipelines and an output of 1.0 Bcfd average and peak 1.6 Bcfd.

There is also another important dimension to the Clearwater and Oceanway's project descriptions. Both Clearwater and Oceanway will be regasifying LNG. However, Clearwater's

² Woodside Application, Section 10.6

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regasification will occur on a stationary platform while Oceanway's will occur on its specially-built regasification shuttle supertankers, the RLNGCs. Despite some differences in certain equipment and in the location of the two projects, both Clearwater and Oceanway are in essence involved in the regasification of LNG and the transportation of natural gas to shore and into the SoCalGas system. Permitting Parity dictates that the environmental review for both projects analyze the air emissions and other potential impacts associated with regasification of LNG, regardless of whether that regasification takes place on a stationary platform or a mobile ship. Indeed, the lead agencies' consideration of the potential environmental impacts associated with ship-board regasification of LNG must include a resource-by-resource analysis of the potential environmental impacts, including, but not limited to potential impacts to air quality, water quality, marine biology, noise, recreation, public safety, aesthetics, and cultural resources.

As another example, Clearwater's application includes information to explain how it will warm the regasified natural gas from near zero to fifty degrees Fahrenheit, as required by the applicable SoCalGas tariffs.³ The additional heat required to warm the natural gas from its near zero temperature at the point of regasification to fifty degrees to meet SoCalGas pipeline specifications will, of course, require additional thermal energy which will in turn result in the potential for additional air emissions and other impacts. Permitting Parity dictates that Oceanway must also examine the potential impacts associated with warming its regasified natural gas to meet the SoCalGas fifty degree pipeline natural gas specification. Similarly, some have speculated about the potential for "fog" associated with the Ambient Air Vaporizers ("AAVs") on Platform Grace. Since the Woodside RLNGCs will also use AAVs, Permitting Parity dictates that Woodside also provide information on the potential for fogging.

The lead agencies in fulfillment of their obligations under NEPA and CEQA have requested certain additional information from Clearwater Port stated in the October 23, 2007 letter from the U.S. Coast Guard and the Maritime Administration and the questions sent to the Applicant by the California State Lands Commission via email on October 24, 2007 (hereinafter referred to as the "Clearwater Data Requests").

Permitting Parity requires the lead agencies to ask for and consider this same information from Oceanway on non-discriminatory basis. Accordingly, in Attachment A, Clearwater has listed the Data Requests promulgated on Clearwater that must in the interest of Permitting Parity be promulgated on Oceanway.

³ SoCalGas, Rule 30, Section I.3.1: "Delivery Temperature: The gas delivery temperature is not to be below 50 degrees F or above 105 degrees F." Available at: http://www.socalgas.com/regulatory/tariffs/tariffs_rules.shtml.

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Conclusion

Clearwater appreciates this opportunity to provide its comments on the important issue of Permitting Parity as part of the scoping process for the EIS/EIR for the Oceanway project. Thank you for your consideration of these important matters.

Sincerely,



Jeffery D. Harris
Ellison, Schneider & Harris L.L.P.
Attorneys for Clearwater Port LLC

ATTACHMENT A

PERMITTING PARITY DATA REQUESTS

The lead agencies in fulfillment of their obligations under NEPA and CEQA have requested certain additional information from Clearwater Port in the October 23, 2007 letter from the U.S. Coast Guard and the Maritime Administration and the questions sent to the Applicant by the California State Lands Commission via email on October 24, 2007 (hereinafter referred to as the “Clearwater Data Requests”).⁴

Permitting Parity dictates that the lead agencies for both NEPA and CEQA treat similarly situated applicants in a non-discriminatory manner. Accordingly, in the interest of Permitting Parity, to the extent that the information requested in the Clearwater Data Requests is relevant to the lead agencies duties under NEPA and CEQA, these same Data Requests should be promulgated on Oceanway.

Clearwater has provided below a list of Data Requests, based on the Clearwater Data Requests, that we believe apply equally to the Woodside project. We believe these Data Requests should be promulgated in this proceeding, recognizing that there are factual distinctions between Clearwater Port and Oceanway that may require the agencies to tailor further these Data Requests to fit the factual circumstances for the Oceanway project. For the convenience of the reader and to allow for ease of cross-referencing to the applicable Clearwater Data Requests, we have included citations to the Clearwater Data Requests.

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- Clearwater has been asked to provide a detailed table comparing current lighting to proposed lighting. It should include type of fixtures, quantity, candela, visible range of lighting, night lighting, and lighting required for any associated regular vessel traffic including LNG carriers and support vessels. Clearwater has been asked to provide specific lighting requirements for construction, operation and decommissioning. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 3.)
- The agencies have suggested that the worst case scenario for a visual impact would be the view from a boat passing near the facility's Safety Zone and Area to Be Avoided. Clearwater has been asked to provide visual simulations of the port and an offloading LNG carrier from a viewpoint at the edge of the Safety Zone and edge of the Area to Be

⁴ Available at USCG Docket Number 28676. Available at <http://www.regulations.gov/fdmspublic/component/main>

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Avoided. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 10.)

- Clearwater has been asked to provide information on the methodologies used in preparation of photo simulations; provide a description of the process of how key observation points were chosen (visual sensitivity analysis); identify what specific photographic equipment was used to take the photos; identify the modeling, illustration and photo-editing software used to prepare the simulations; and provide a description of any other tools used in the preparation of the simulations. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 11.)
- Clearwater has been asked to provide air emission calculations to account for all construction and operational activities that occur within California Coastal Waters as defined in 17 CCR 70500. These emission calculations should include operation of all marine vessels associated with Project (e.g., LNG carriers, tugs, construction vessels) between shore and the California Coastal Waters boundary. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 20.)
- Clearwater has been asked to provide emission spreadsheets. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 23.)
- For firewater pump Clearwater has been asked to provide example calculations that show derivation of emission rate in lb/hr and tons/year. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 24.)
- For the IC engine generator, Clearwater has been asked to provide example calculations showing how uncontrolled emission rate (in units g/bhp-hr) are converted to controlled emission rates (in units of lb/hr). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 26.)
- For the IC engine generator, Clearwater has been asked to provide the manufacturer's data including emission factors for NO_x, CO, VOC, and formaldehyde for uncontrolled conditions (i.e., prior to use of selective catalytic reduction [SCR]). These emission factors should provide emission data for a range of potential ambient conditions (i.e., from 50 oF to 100 oF). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 27.)
- Clearwater has been asked to provide calculations for the control of VOC emissions with the oxidation catalyst. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 28.)
- Clearwater has been asked to provide the height (above sea level) of the vaporizers on Platform Grace and similar AAVs will be on the Woodside RLNGC shuttle supertankers. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 29.)

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- Clearwater has been asked to supply manufacturer's data for PM10/PM2.5, SO2, VOC, and formaldehyde, or provide manufacturer's data. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 32.)
- Clearwater has been asked to indicate why PM2.5 not included in the air quality impact analysis. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 49.)
- Clearwater has been asked to indicate the maximum daily flow (in gpd) of contaminated rain water that does come in contact with equipment. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 52.)
- Clearwater has been asked to provide details on a strategy to acquire emission offsets that would be required for the Project under applicable SCAQMD rules. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 56.)
- The agencies have suggested that Clearwater's information presented may differ from a recent study of LNG carriers in Europe. Clearwater has been asked to provide the reference that indicates the percentage of current fleet of LNG carriers that use marine diesel engines vs. steam turbines. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 59.)
- Clearwater has been asked to indicate if a modeling protocol was prepared for the air quality modeling analysis. If a modeling protocol was prepared, Clearwater has been asked to provide a copy of this protocol. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 60.)
- Clearwater has been asked to provide detail on the modeling analysis (i.e., text description of analysis, map of receptor locations, receptor spacing). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 61.)
- Clearwater has been asked to provide the input and output modeling files for the air quality analysis and provide the raw and processed meteorological files used in the analysis. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 62.)
- Clearwater has been asked to provide the potential maximum speeds of the LNG carrier or the speed at slow cruise during "Cruise to the Shipping Lanes." Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 67.)
- Clearwater has been asked to provide a map that shows the "rendezvous" positions for the LNG carrier and the Mooring Master for each LNG carrier route (i.e., north/west and south). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 71.)

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- Clearwater has been asked to provide the air permit application or revised air permit application it has prepared. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 76.)
- Clearwater has been asked to indicate the size of the LNG carrier that is the basis of the emission calculations. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 87.)
- Clearwater has been asked to provide manufacturer's data for PM10 emissions. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 89.)
- Clearwater has been asked to provide information on any emission reduction credits that might be generated by shutdown sources. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 90.)
- Clearwater has been asked to provide the potential maximum speeds of the LNG carrier or the speed at slow cruise during "Cruise to the Shipping Lanes." Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 93.)
- Clearwater has been asked to provide total emissions for construction period in tons. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 95.)
- Clearwater has received a Data Request that states that under NEPA, the EIS must evaluate the full range of reasonable offshore LNG facility alternatives; this includes alternative port designs, port locations, offshore pipeline routes, and alternative shore crossings. Clearwater has been asked to provide an analysis of the full range of offshore alternatives to the proposed action. This analysis should clearly identify the criteria used to evaluate the reasonableness of any alternatives and the specific reasons why any alternatives are eliminated from detailed analysis. For those alternatives brought forward for detailed analysis, provide a resource-by-resource analysis of the potential environmental impacts associated with the alternatives such that they can be clearly compared against the proposed action. In presenting these analyses, Clearwater has been asked to be mindful that an outcome whereby no alternatives are brought for detailed analysis will be difficult to defend under NEPA and may result in additional data gap questions. In addition, under NEPA, economics should not be the sole criteria by which an alternative is eliminated from detailed analysis. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 96.)
- Clearwater has been asked to provide for the HiLoad port design alternative a more in-depth description of the HiLoad port design with a resource-by-resource analysis of potential impacts. Clearwater has been asked to provide comparative environmental data supporting the conclusion that the HiLoad port design would not be environmentally superior to the proposed design. The comparison should emphasize impacts on biological resources, water quality, and air quality, including but not limited to impacts

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from installation of the port, water intakes and discharges, air emissions (both stationary and mobile sources). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 100.)

- With regard to analysis of an offshore platform alternative, Clearwater has been asked to provide detailed analysis of the selection criteria that could be used to evaluate the available offshore platforms and the rankings for each platform. How would resources be affected differently? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 101.)
- For the floating regasification facility alternatives, Clearwater has been asked to provide the criteria used to evaluate these facilities and the rankings resource-by-resource to determine the superiority of the proposed Project over these other options. For example, what are the differences in air emissions, water intake, water discharge, temperature of water discharge, chemicals in water discharge, size of safety zones, size of ATBAs, marine traffic, time in port for carriers, footprint, visual impact, etc.? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 103.)
- Clearwater has been asked to provide other alternative pipeline routes from Platform Grace to the landfall location and the reason why the proposed action was chosen compared to other possible alternative routes. For instance, does this route avoid fault lines or other geologic or submarine obstacles? Are there any submarine cables that would be avoided by the selected route? Does this route avoid any lease blocks or regulated land uses? Clearwater has been asked to provide the criteria used to screen potential offshore pipeline routes. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 105.)
- Clearwater has been asked to provide a comparison of environmental impacts on coastal and onshore biological resources between HDD and HDB. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 106.)
- Clearwater has been asked to provide a table comparing environmental parameters, including but not limited to: air emissions, water uptakes and discharges, metocean constraints, footprint, thermal discharges, and natural gas required, for all the regasification technologies considered. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 107.)
- With regard to nitrogen injection facilities the following questions asked of Clearwater should be asked of Oceanway: a) In order to evaluate the onshore alternative, it is necessary to know the emissions that would be generated from it and the impacts of the construction and operations of the onshore facility, b) In order to evaluate the offshore alternative, it is necessary to be provided a more detailed description of each alternative. What would be the consequences of this plan? What would be the increase in vessel traffic?

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- Clearwater has been asked to provide a resource-by-resource comparison of environmental impacts of the alternatives LNG transfer systems. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 112.)
- Clearwater has been asked to provide Cultural Resources surveys, any updated surveys, a plan and schedule for when outstanding surveys will be completed, and a discussion of surveys and analyses that need to be accomplished in order to meet NEPA and CEQA requirements. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 113.)
- Clearwater has been asked to explain whether any project-specific plans have been developed for the unanticipated or inadvertent discovery of cultural resources or human remains, other than archaeological monitoring during construction. Clearwater has been asked to provide copies of these plans, if available and also provide copies of correspondence with state and federal agencies responsible for reviewing such plans, indicating concurrence with these plans. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 114.)
- Clearwater has been asked to provide a table listing areas not surveyed and reasons (access, topography, development issues, etc.). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 115.)
- Clearwater has been asked to provide formal definitions for archaeological or architectural APEs, and define APEs for project and produce accompanying map with APEs. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 116.)
- Clearwater has been asked to provide copies of all correspondence (with relevant attachments) to and from state and federal agencies responsible for reviewing and commenting on cultural resources in the project area (i.e., the California Office of Historic Preservation, the Minerals Management Service, etc.). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 117.)
- Clearwater has been asked to provide a map or mention how much of the APE has been covered by previous surveys, or a map showing the project alternatives and the plotted surveys. There is no way to tell how much of the area has been covered by a recent (5 years or less) survey. Clearwater has been asked to provide the records search materials and construct a map showing the extent of previous survey coverage, and what years the surveys were conducted in. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 118.)
- Clearwater has been asked to provide an architectural survey to identify historic structures required for these portions of the project, provide the results of any architectural surveys performed for this portion of the project, if required, and include copies of correspondence to and from state and federal agencies responsible for

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reviewing and commenting on architectural resources in the project area, as appropriate (include attachments). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 119.)

- Clearwater has been asked to provide show population statistics and show the pipeline route through such areas. Clearwater has been asked to show the pipeline route through those populations and provide the georeferenced GIS layers of these routes so these analyses can be added for this section. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 120.)
- With regards to public outreach efforts, the contact information developed for these meetings will be needed to continue the outreach efforts for the EIS/EIR process. Clearwater has been asked to provide an electronic spreadsheet or database file of the contacts used and received for the public outreach meetings. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 121.)
- Clearwater has been asked to provide the following needed information to clarify the Environmental Justice discussion: (a) What is the poverty level used in the study area? Or, what Census Bureau data are used to represent this information?; (b) What does it mean in this analysis to be “low income”?; (c) What does it mean to be “minority” in the analysis presented? Is this the same as “non-white” in the Census data?; and (d) What Census tables are the sources of these data? Were only the Quickfacts used, as noted in the reference section? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 122.)
- Clearwater has been asked to provide specific areas affected by each impact noted. Without this information, it is difficult to illustrate the overlap between the impacts and the populations affected. Clearwater has been asked to provide a discussion on the areas affected by each impact and/or maps illustrating these areas of effect (for better assessment of the disproportionality of effect on each population). Further, without this information on the intensity of the effects, it is difficult to assess whether the impacts are “high and adverse”. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 123.)
- Clearwater has been asked to provide a discussion of the applicant's contingency plan that will be in place should a vessel's anchor break free and/or begin dragging in the vicinity of pipelines. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 125.)
- Clearwater has been asked to provide an updated Verification of Feasibility Study that provides more recent design verification of the proposed concept based on the 21st edition of the API RP, and soil and environmental conditions appropriate for the CA coast. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 126.)
- Clearwater has been asked to provide an analysis of impacts to soils and environment if the natural gas transmission line leaks or is ignited. Agency Data Requests on this same

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subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 127.)

- Clearwater has been asked to specify which severe earthquake design criteria will be used in the final design phase. If other than 200-yr criteria, provide citations. Clearwater has been asked to provide all available criteria. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 128.)
- Clearwater has been asked to provide all Seismic Spectrum origins. Clearwater has been asked to provide reference for 200 year and all others considered. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 129.)
- Clearwater has been asked to submit CA licensed geological engineering certified geotechnical report which will include the geotechnical data together with geotechnical recommendations and confirmation of the adequacy of the proposed directional drilling program at the intended depth based on the existing subsurface conditions. Clearwater has been asked to include abandonment contingency plans and HDD drilling fluid QA/QC program. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 130.)
- Clearwater has been asked to provide an analysis of pipeline stability under turbidity flows. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 131.)
- Clearwater has been asked to include engineering analysis and supporting calculations for free span analysis and provide Maximum Allowable Span Analysis. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 132.)
- Clearwater has been asked to provide engineering analysis with supporting calculations verifying bottom stability of the proposed pipeline from buoyancy, and for unburied pipe from lateral forces of prevailing ocean currents and 100 year storm waves. Clearwater has been asked to provide the Bottom Stability Analysis for offshore pipelines. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 133.)
- Clearwater has been asked to provide an earthquake-induced liquefaction potential analysis. Address portions of the project pipeline that may be developed on artificial fill and other similar loose or soft substrates. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 134.)
- Clearwater has been asked to provide an up-to-date active fault map using high resolution multi-beam bathymetric device to determine active seafloor faulting and past landslides. Clearwater has been asked to use seismic reflection data from private industry to improve working subsurface geometry and offshore faulting. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 135.)

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- Clearwater has been asked to provide improved hazard assessment due to potential future earthquakes and liquefaction. Clearwater has been asked to collect sediment cores offshore to determine fault slip rates, and earthquake potential and chronology of seismic or seismic related events. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 136.)
- Clearwater has been asked to provide liquefaction potential when natural gas pipeline is transmitting at full weighted capacity. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 137.)
- Clearwater has been asked to provide a full sampling and analysis to determine if any pollutants including increased BOD and COD will be addressed for both the construction and operational phases of the project, especially in regards to pipeline installation and vessel anchoring. Clearwater has been asked to provide results of sampling and analysis; and methods for handling/disposing hazardous materials found in sediments during construction and operation. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 138.)
- Clearwater has been asked to provide a sampling plan and analysis of potential for release of pollutants and sediments during construction of unloading facilities by anchors of construction vessels and installation of pilings. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 139.)
- Offshore and onshore pipelines are required to meet industry seismic standards: PRCI 2004 guidelines and ALA 2001 guidelines. Clearwater has been asked to provide a discussion of how pipelines will meet these requirements. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 140.)
- Clearwater has been asked to provide a discussion of energy and mineral resources in the project vicinity, and evaluate whether construction, operation or decommissioning would restrict access to energy or mineral resources. Clearwater has been asked to provide a discussion regarding whether the proposed project would be compatible with adopted energy conservation plans, policies, or existing energy standards. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 141.)
- Clearwater has been asked to define hazards associated with pipeline crossing and also determine potential to damage pipeline due to underwater turbidity currents and debris flow from mouth of SCR during extreme flow conditions. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 142.)
- Clearwater has been asked to describe details of eventual decommissioning of facility and how this would impact sediments/ topography/seafloor. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 143.)

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- Clearwater has been asked to provide a section discussing existing paleontological resources and potential impacts associated with construction, operation and decommissioning. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 144.)
- Clearwater has been asked to include a table of soil types and soil maps located along pipeline routes, staging areas and other onshore facilities. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 145.)
- Clearwater has been asked to provide pipeline design for seismic area. Clearwater has been asked to discuss results of surveys completed and expected mitigation/design details for active fault areas. Clearwater has been asked to provide input on design for seismic area in light of the active faults. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 146.)
- Clearwater has been asked to provide a sampling plan and analysis of offshore sediment for priority pollutants, including a determination of the likelihood for spreading potential contaminated sediment. Clearwater has been asked to provide sampling and analysis plan along with core sampling required for additional seismic investigation. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 147.)
- Clearwater has been asked to provide an offshore bathymetric map with project components overlaid on it. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 148.)
- Clearwater has been asked to provide an onshore geologic map showing pipeline route and project components. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 149.)
- Clearwater has been asked to provide anchoring details for construction barges. Clearwater has been asked to submit detailed anchoring plan that includes at a minimum the estimated total area of seafloor disturbance from anchoring, volume of sediment disturbed, and an explanation of how these areas and volumes were calculated. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 150.)
- Clearwater has been asked to provide more detailed information on soil management during construction. For instance, topsoil and tillable agriculture soils should be segregated from other non-usable soil and detritus (subsoils not weathered into a soil profile). Usable soil should be stored and managed separately from that material that has no agricultural value, or is contaminated. If any contaminated soils are encountered, a suitable management plan should be employed for any soil re-use and disposal options. Clearwater has been asked to provide an updated discussion on soil management. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 151.)

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- Clearwater has been asked to provide quality control/quality assurance plan (QA/QC) HDD program for fluid control. Clearwater has been asked to provide a QA/QC for HDD program that includes information on mud control, including viscosity measurements and record keeping, mud loss, lost circulation controls, pipeline installation and procedures, and post installation mud management and disposal. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 152.)
- Clearwater has been asked to provide slope stability analysis for small scale submarine landslides. Clearwater has been asked to provide survey results and written analysis for underwater pipeline route with high-resolution multi-beam bathymetric imagery. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 153.)
- Clearwater has been asked to provide a discussion of trench dewatering. Dewatering may produce contaminated shallow groundwater. Clearwater has been asked to provide QA/QC program for trench dewatering activities. Clearwater has been asked to include capture and disposal of contaminated groundwater and sediment in QA/QC program. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 154.)
- Clearwater has been asked to provide best management practices (BMPs) and erosion control for earthmoving activities. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 155.)
- Clearwater has been asked to identify the number, location and dimensions of staging areas for the pipeline route. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 156.)
- Clearwater has been asked to provide an analysis of impacts to roads from increased traffic and heavy equipment, including a discussion of mitigation measures for roads disturbed by wear and tear from increased traffic. Does the applicant plan on making improvements to existing roads prior to construction? In addition, Clearwater has been asked to provide a mitigation plan for restoration of any roads damaged during construction. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 157.)
- Clearwater has been asked to provide specific information about lane closures, including location, schedule of closures, procedures to close lanes (signs, staff, protocol). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 158.)
- Clearwater has been asked to provide the existing number of traffic lanes for the roads and highways along the proposed routes, and specifications for any road improvement projects that are planned. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 159.)
- Clearwater has been asked to provide information about the size of construction vehicles. Will all construction vehicles listed be regulation size, and if not, how many are

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oversized and require appropriate escorts/other accommodations. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 160.)

- Clearwater has been asked to determine if other projects may coincide with this project during its construction season (for example—municipal sewer line construction that would affect the same roads), the potential overlapping effect on traffic, and any measures the applicant would take to mitigate these impacts. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 161.)
- Clearwater has been asked to provide data for projected increase in traffic volumes for any roads or highways during construction, operation and decommissioning. Clearwater has been asked to provide in a new table, projected increase in traffic volumes for construction phase for all roads and highways. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 162.)
- Clearwater has been asked to provide information regarding offsite shuttle service for crew and parking availability for personal vehicles. If a shuttle is provided, state where and how many trips the shuttle will run. If no shuttle is planned, where and how many parking spaces are available for personal vehicles and impacts to local parking and traffic. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 163.)
- Clearwater has been asked to provide information that differentiates between worker commute trips in personal vehicles and company pickup truck trips. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 164.)
- Clearwater has been asked to provide a comparison of preferred v. alternatives alignments in terms of traffic impacts. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 165.)
- Clearwater has been asked to provide a table with milepost information, dominant land uses within 500 feet of pipeline, and estimated construction time in days. Clearwater has been asked to provide a table broken down by milepost (0-1, 1-2, 2-3) including dominant land use(s) within 500 feet of pipeline, potential roadway/railway crossings, and estimated construction time in days for that mile. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 166.)
- Clearwater has been asked to provide a list or map describing land uses along the proposed and alternative project locations, and information about sensitive land uses and their locations, particularly churches, schools, hospitals, day care centers, etc. a) Please provide electronic and paper maps showing the land uses along the proposed and alternative project locations. Clearwater has been asked to include information about offshore uses as well as typical land uses. For areas along the land routes, Clearwater has

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been asked to show the land use within at least a 1/2 mile buffer on either side of the pipeline routes (1 mile total width). For offshore areas, Clearwater has been asked to provide a map showing the recreational, Department of Defense, and commercial fishing areas, as well as the shipping lanes. b) Clearwater has been asked to provide the address data for the sensitive land uses, including hospitals, schools, churches, and day care facilities along the proposed and alternative routes. Clearwater has been asked to provide the distance of these land uses from the proposed pipeline routes. On a second map, Clearwater has been asked to show the locations of these sensitive land uses. Are there local government restrictions on the placement of natural gas distribution lines near these land uses? c) Clearwater has been asked to provide a listing of the predominant land uses along each of the onshore pipeline routes, describing any expected land use changes along those routes as a result of the proposed project. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 167.)

- Clearwater has been asked to clarify the seawater intake requirements of this project by submitting a table of individual intakes, location of intake, purpose of intake, and annual average and peak intake rates. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 168.)
- Clearwater has been asked to provide a discussion on plankton in the surrounding water column, with a description of distribution of ichthyoplankton nearshore, near the landing area, and offshore, surrounding the proposed project, or seasonal and diurnal distribution patterns. Clearwater has been asked to provide information on distribution of ichthyoplankton surrounding the project area using CalCOFI database or other data available for this area. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 169.)
- Clearwater has been asked to provide a discussion of cold water discharge on plankton, which is a topic that has been raised by several resource agencies on other projects. Clearwater has been asked to provide an impact analysis on planktonic communities in the project area as a result of this discharge, including a discussion of potential cold effects on ichthyoplankton, zooplankton, phytoplankton, and fisheries resources. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 170.)
- Clearwater has been asked to provide an updated special status species list. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 171.)
- Clearwater has been asked to provide an analysis of potential entanglement of marine mammals with the mooring system for project features. How will the operations of the buoy anchoring systems at the port impact marine mammals in the surrounding area? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 174.)

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- Clearwater has been asked to provide a discussion on light levels during nighttime operations of the port and how changes in light levels would alter the distribution of marine biota in the surrounding area. How will safety lights and flood lights affect plankton, squid, and/or fish species in the area? Will light levels be at a level that they may impact nesting sea turtles migration routes? Will night lights on the structure impact flight patterns of birds at night? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 175.)
- Clearwater has been asked to provide an analysis of the added risk of potential vessel strikes/collisions with threatened and endangered marine mammals due to increased vessel traffic (including support vessels) from the proposed project. This analysis should cover both construction and operation phases for both the port and related offshore pipeline(s) and should include the area surrounding the port well as LNG carrier approach routes. This information should also be provided for all port and offshore pipeline alternatives brought forward for detailed analysis. Also provide any correspondence, phone consultations or meeting notes that the applicant may have reflecting consultation with NOAA regarding this issue. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 176.)
- Clearwater has been asked to provide a project-specific survey of the seafloor habitats, including a discussion as to whether white abalone (or potential habitat) observed during this survey? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 177.)
- Grunion could use landfall area for spawning. Are their spawning beaches in the bay or surrounding area? Have surveys been conducted in the area to determine grunion spawning? If so, please provide survey report. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 178.)
- Clearwater has been asked to provide a discussion on potential noise generated by offshore pipeline operation (i.e., noise generated from friction of natural gas flowing through risers, pipeline, and various valves and fittings). What noise level is expected from pipeline operations? Clearwater has been asked to provide estimated underwater-radiated noise level at different flow cases, and assess what impact these changes in noise levels may have on fish and marine mammals in the surrounding area. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 180.)
- Clearwater has been asked to include a discussion on areas fished in the project area, and especially within the Safety Zone and Area To Be Avoided, including seasonal restrictions and major species caught for recreational fisheries. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 181.)

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- Clearwater has been asked to provide aerial photos with onshore pipeline routes including mileposts. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 182.)
- Clearwater has been asked to provide an evaluation of noise from vessel and tugs during docking process at the port (in air and water). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 183.)
- Clearwater has been asked to provide construction equipment list and associated noise emission levels at given distance (air and water) for construction equipment and vessels to be used. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 184.)
- Clearwater has been asked to provide construction equipment list and associated noise emission levels given distance (air and water) for construction equipment and vessels to be used during offshore pipe laying operation. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 185.)
- Clearwater has been asked to provide equipment list and associated noise emission levels given distance in air for HDD operations. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 187.)
- Clearwater Port has been asked whether there will there be helicopter trips to the LNG carriers. If so, state the purpose of these trips, number of trips, and from where these trips would originate. Agency Data Requests on this same subject should be promulgated on Oceanway with respect to both the LNG carriers and the RLNGC shuttle supertankers. (Refer to Clearwater Data Request No. 188.)
- Clearwater has been asked to discuss plans to identify pipeline areas that may be subject to accelerated corrosion. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 189.)
- Clearwater has been asked to provide emergency response preparation for potential onshore pipeline rupture/leak: emergency response, evacuation plans, routes, emergency communication, etc. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 190.)
- Clearwater has been asked to identify HCAs along the proposed and alternative onshore pipeline routes by mileposts or provide map showing HCAs by milepost. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 193.)
- Clearwater has been asked to provide a discussion of pipeline integrity management program, monitoring needed. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 195.)
- Clearwater has been asked to provide a list of major laws, regulatory requirements, and plans for public safety regarding pipelines. Also include discussion of pipeline classes,

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relevant OPS advisories, pipeline incident reporting requirements, pipeline safety and inspection details. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 196.)

- Clearwater has been asked to provide hazard footprint for the onshore pipelines. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 198.)
- Clearwater has been asked to provide SoCalGas natural gas transmission pipeline incidents history. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 199.)
- Clearwater has been asked with regard to risk assessment for onshore pipeline to discuss the potential for accidental or intentional damage to the onshore pipelines or valves carrying natural gas from human error, equipment failure, natural phenomena (earthquake, landslide, etc.) and the resulting damage, fires, and explosions that may occur. Clearwater has been asked to discuss the potential for a release of a natural gas cloud at concentrations that are likely to be in the flammable range. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 200.)
- Clearwater has been asked to provide a discussion on safety ramifications of directly introducing gas into the SoCalGas System and address potential safety concerns related to delivering gas directly into the SoCalGas system Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 201.)
- Clearwater has been asked whether remote or automatic valve closures will be used to limit potential release duration and the quantity of natural gas that might be released from a ruptured pipeline segment? Clearwater has been asked to provide design guidelines and project specific valve spacings for the four onshore pipeline components of the project. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 202.)
- Clearwater has been asked whether the pipeline segments will be designed to meet the minimum design criteria for a USDOT Class 3 location? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 203.)
- Clearwater has been asked to provide a map and/or discussion with proximity of onshore pipeline to residences and schools. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 204.)
- Clearwater has been asked to discuss whether pilots will be required at harbors for the vessels involved with construction, operations and decommissioning. Coastal pilot usage is noted for LNGC arrivals (but not departures) and whether these pilots will be Project employees or drawn from existing pilot's associations or how they will be trained/qualified. Clearwater has been asked to discuss whether it has anticipated harbor pilot needs for construction, operations and decommissioning, where coastal pilots will

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be drawn from and how they will be trained and qualified, and whether coastal pilots will be used for departure of the LNG carriers. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 215.)

- Clearwater has been asked to clarify the size of Safety Zone. Specifically, it was asked if the safety zone extend 500 meters from all project components, including moored LNG carriers? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 216.)
- Clearwater has been asked to provide the number of trips to and from shore, usage duration (in days) and time spent on station or in port is also needed. Clearwater has been asked to provide a summary table of all project related vessel traffic with columns for project phase (construction, operations, decommissioning), duration of phase (days), proposed dates of each phase, type and number of vessels used, a representative vessel (incl. name, and characteristics such as length, speed) number of one way trips to and from shore by vessel type per day or week and annually (or numbers of days on station to perform its function). Please include refueling barge/vessels needed for diesel fuel replenishment. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 218.)
- Clearwater has been asked to provide a diagram of existing oil service vessel corridors. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 222.)
- Clearwater was asked how it will monitor and respond to a possible release of drilling muds. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 223.)
- Clearwater has been asked to provide a diagram of the marine traffic corridors or a description of the TSS or oil service corridors. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 225.)
- Clearwater has been asked to provide information as to whether there will be any additional aids to navigation marking the approaches or departure routes to the port, including visual ranges, or additional buoy gates. Will the fixed port have AIS, radar beacons or other electronic aids to navigation? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 227.)
- Clearwater has been asked to provide a summary of how control of recreational and commercial vessels takes place in the offshore environment in the project area. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 228.)
- Clearwater has been asked to provide a diagram of designated fairways as they relate to Safety Zone entrance. Also please denote any anchorage area in the Project safety zone and explain how underway LNG carriers will maintain 5 mile separation in the safety

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zone. What is the size of the safety zone? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 229.)

- Clearwater has been asked where and how an LNG carrier seek shelter? Would it involve anchoring or approach closer to land (i.e. stationkeeping or anchoring in the lee of an island)? Would tugs escort the LNG carriers or be released to port? Would a coastal pilot be on board? Agency Data Requests on this same subject should be promulgated on Oceanway with regard to both the LNG carriers and the RLNGC shuttle supertanker. (Refer to Clearwater Data Request No. 231.)
- Clearwater has been asked to provide data on recreational traffic volume, and routing in the project area. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 232.)
- Clearwater has been asked to provide a summary table of all project related vessel traffic with columns for project phase (construction, operations, decommissioning), duration of phase (days), proposed dates of each phase, type and number of vessels used, a representative vessel (incl. name, and characteristics such as length, speed) number of one way trips to and from shore by vessel type per day or week and annually (or numbers of days on station to perform its function). Please include refueling barge/vessels needed for diesel fuel replenishment. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 234.)
- Clearwater has been asked to provide updated (less than 5 years old) details for all sources/destinations/origins of vessel traffic in the project area, including: ports, military ops, offshore terminals and platforms, fishing grounds, recreational attractions (CINP) and any other such sources/destination/origins. Detail vessel traffic in the Project area by vessel type and provide areas of operation/transit routes for all vessel types, including: military, large commercial (broken down by those using the TSS, those using the Western approach, and those not transiting near the project [ex. the LA/LB traffic heading south]), commercial fishing, small commercial (oil support, charter, etc) and recreational traffic in sufficient detail to determine: 1. numbers of each vessel type likely to operate or transit within 12 NM of the Project on a monthly and yearly basis, and 2. TSS lane usage by direction of travel. For all sources and types of vessels provide estimated growth/decline forecasts of vessel traffic for the project area for the life of the project. Clearwater has been asked to provide data on the densities/routes per month for all non-AIS equipped vessels near the project (including harbors used for construction, operations and decommissioning). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 235.)
- Clearwater has been asked to specify which ports will be used for construction, operations, and decommissioning. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 236.)
- Clearwater has been asked to provide a statement as to why onshore socioeconomic impacts are not discussed in the document, or provide an analysis of those impacts, with associated demographic and business data to support the conclusions. In particular,

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Clearwater was asked to focus on: 1. numbers of workers to be employed by the project, for how long; 2. potential impacts of those workers on housing and retail markets, and utilities use in the region. If the workers will be there long enough, the analysis also should include information about impacts on schools and emergency services, also. To do so will require data on current housing and retail characteristics along the proposed project and the extent of the study area and the reasons why that area was chosen; 3. For effects on retail and commercial interests, particularly along the pipeline route, compare the presence of retail and commercial establishments along those pipeline routes with estimates of how long traffic and access would be disturbed in front of those businesses; 4. What are the regional data on housing, population, and employment? Focus the employment data on the relevant sectors of employment that might be affected by the proposed project. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 239.)

- Clearwater has been asked to provide an estimation of the potential impacts on the economic value of the annual fish harvest that may result from the proposed project before, during, and after installation. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 240.)
- Clearwater has been asked to provide information on regional tourism, including estimated numbers and value from various segments of the tourism industry. Clearwater has been asked to provide an analysis of potential changes in levels of recreation use or tourism in the area as a result of the various project activities. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 241.)
- Clearwater has been asked to provide a horizontal directional drill (HDD) plan that addresses issues regarding the protection of the threatened, endangered, and special status species and plants. Clearwater has been asked to provide the locations of staging area(s) anticipated for both proposed and contingency crossing methods. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 243.)
- Clearwater has been asked to provide details on the types of biological surveys that were done, the methodologies that were used, and the width of the survey corridor. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 244.)
- Clearwater has been asked to provide locations of species occurrences by nearest milepost, and reference for each species occurrence and give species data for exact locations or township/ range, if available from the CNDDDB. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 245.)
- Clearwater has been asked to provide discussion on the potential impacts of drilling fluids released during drilling operations at the landfall and should provide drilling plan and an updated discussion on potential impacts. Agency Data Requests on this same

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subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 247.)

- Clearwater has been asked to provide a discussion of the location of the wetlands within the pipeline routes or impacts. Clearwater has been asked to provide locations of wetland and waterbody features by milepost, and also indicate the crossing method (including width of ROW), acres disturbed during construction, and acres of permanent impact. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 249.)
- Clearwater has been asked to provide species-specific surveys for plant and wildlife species deemed sensitive by the USFWS and CDFG. These surveys need to be conducted for the proposed and alternative routes after consulting with CDFG and USFWS to identify which species surveys will be required and the level of effort required. Clearwater has been asked to provide these species surveys, if available, along with communications with USFWS and CDFG (i.e., phone logs, e-mails, meeting notes) regarding survey protocols. Clearwater was asked to identify gaps in survey data by milepost, citing reasons for the gap (i.e., denied access; surveys not completed within appropriate time period; etc.), whether suitable habitat exists in areas not surveyed, and when those surveys will be completed. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 252.)
- Clearwater has been asked to provide an updated analysis of impacts on federal and state listed species reflecting the current USFWS species list for the project area. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 253.)
- Clearwater has been asked to provide a discussion regarding the potential for engine cooling water releases from support vessels/equipment. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 254.)
- Clearwater has been asked to provide a current listing of impaired water bodies in the vicinity of the project. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 255.)
- Clearwater has been asked to provide the capacity of each AAV Bank. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 263.)
- Clearwater has been asked to provide the volume of water that is generated by the AAVs and explain how that water will be disposed of by the applicant. Agency Data Requests on this same subject should be promulgated on Oceanway, since the RLNGC shuttle supertankers have AAV systems. (Refer to Clearwater Data Request No. 264.)
- Clearwater has been asked to indicate potential effluent limits in a future NPDES permit for hydrostatic test water. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 266.)

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- Clearwater has been asked to identify what buoy was used to develop the reported annual water temperature range. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 271.)
- Clearwater has been asked to identify what years and how many data points were used to develop significant wave height and wave period statistics. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 273.)
- . Clearwater has been asked to identify the expected heat transfer between seawater and the subsea pipelines and provide calculations and/or justification of response. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 278.)
- Clearwater has been asked to provide a discussion of the mechanisms that would be used to prevent LNG carriers from releasing bilge water. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 280.)
- Clearwater has been asked to identify what the impact would be to marine toxicity levels if contaminant levels in the released drill mud were not consistent with EPA-approved conventional drill mud. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 282.)
- Clearwater has been asked to identify if there are any survey(s) of sediment/soil contamination in onshore pipeline areas that may affect groundwater seeping into trenches. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 285.)
- Clearwater has been asked to provide an analysis of potential contamination along the offshore pipeline route. Clearwater has been asked to identify if sampling has been performed to assess potential contamination in offshore areas. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 286.)
- Clearwater has been asked to provide a schedule of construction activities. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 287.)
- Clearwater has been asked to identify where the proposed entry and removal points for hydrostatic water into the offshore pipeline would be located. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 288.)
- Clearwater has been asked to provide a discussion of ballast water intake, including volumes for all vessels used by the project, and location of intakes and discharges. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 290.)

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- Clearwater has been asked to provide a discussion regarding the potential for engine cooling water releases from LNG carriers, including a range of intake and discharge rates and total volume of water affected while at or in the vicinity of (within the Safety Zone) of the port. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 291.)
- Clearwater has been asked to provide a historical summary of recorded maximum wave heights in the Project area. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 292.)
- Clearwater has been asked to provide a map and description of potential LNG carrier routes from the California Coastal Waters Boundary to the Port. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 293.)
- Clearwater has been asked to provide a map showing the existing vessel traffic corridors between the deepwater port and all ports that have been established by the Joint Oil Fisheries Liaison Office (JOFLO) for use by the oil and gas industry to minimize conflicts with commercial fishing activities. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 294.)
- Clearwater has been asked to provide information on potential waterborne bacteria in the project area. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 299.)
- Clearwater has been asked to provide more specific details on the possibility of onshore pipeline installation effecting shorelines capability to withstand significant future flood and wave events and increase sedimentation. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 301.)
- Clearwater has been asked to provide the name of the weather station used to show onshore temperatures. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 306.)
- Clearwater was asked about the source of hydrostatic water and asked to indicate the anticipated source of hydrostatic water: fresh water or seawater. If seawater, Clearwater has been asked to provide a description of additives that would be added to the water prior to hydrostatic testing. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 309.)
- Clearwater has been asked to specify the constituents of concern that would be released into surrounding marine waters due to the driving of anchor piles for the Port. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 310.)
- Clearwater has been asked to specify the constituents of concern that would be released into surrounding marine waters due to the driving of anchor piles for the port. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 311.)

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- Clearwater has been asked to provide calculations of heat transfer between seawater and LNG if the trim heat system is placed onshore. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 312.)
- Clearwater has been asked to explain what requirements would lead the testing of hydrostatic test water and what parameters would be included in this testing. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 313.)
- Clearwater has been asked to indicate what subsea pipelines might be crossed during offshore pipeline installation. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 319.)
- Clearwater has been asked to provide additional information on the calculation of estimated release of drill mud. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 320.)
- Clearwater Port has been asked to provide the anticipated number of required trips for supply vessel/barge each year .. Agency Data Requests on this same subject should be promulgated on Oceanway for the LNG carriers and the RLNGC shuttle supertankers. (Refer to Clearwater Data Request No. 330.)
- Clearwater was asked to clarify its proposed in-service date. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 341.)
- Clearwater has been asked to provide sea states and wind conditions under which operations would be limited or curtailed, and compare this with other technologies in its alternatives analysis. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 342.)
- Clearwater has been asked what is the maximum volume of LNG that would be released with AAV rupture. How many AAVs is this volume associated with? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 346.)
- Clearwater has been asked how much of the seafloor that would be impacted by anchoring during construction would be hard substrate. Please provide the maximum possible hard bottom area that could be affected (i.e., if avoidance measures are not effective) and the minimum hard bottom area (i.e., if measures to reduce impacts are effective). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 347.)
- Clearwater has been asked to specify the method(s) and materials that will be used to reduce noise impacts during construction. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 348.)
- Clearwater has been asked to provide the maximum area that would be covered by the safety zone(s) proposed around each of the work areas during construction, and indicate

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how that area was calculated. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 349.)

- Clearwater has been asked to provide a discussion of how post-construction restoration and revegetation of onshore pipeline ROWs will be conducted in order to satisfy local aesthetics guidelines listed and for areas where new ROW would be constructed, how revegetation would minimize the contrast between the new ROW and the surrounding landscape. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 350.)
- Clearwater has been asked to provide a table showing for each proposed and alternative onshore and offshore pipeline route: length (miles) of new pipeline parallel (but not overlapping) an existing ROW; separation distance (ft) between the new ROW and existing parallel ROW; length (miles or ft) of new pipeline ROW that would be adjacent and overlapping an existing ROW; width of overlap between the new ROW and existing ROW. In a separate table, show by milepost the acres of construction and permanent ROW for all onshore proposed and alternative pipeline routes that would be: new ROW; adjacent to existing ROW but not overlapping; and overlapping existing ROW. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 351.)
- Clearwater has been asked under what circumstances would non-impact pile installation methods be feasible. When will the use of non-impact pile installation vs. standard (impact) pile installation be determined? What sound pressure levels are produced with non-impact pile installation methods? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 351.)
- Clearwater has been asked if power to the pile driver is ramped up to allow marine wildlife to detect a lower sound level and depart the area before full-power noise levels are produced, what would the maximum under water sound pressure level be. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 352.)
- Clearwater has been asked to provide a discussion regarding the feasibility of using passive acoustic monitoring (PAM) in addition to visual observation to detect marine mammals that may be within the 160 or 180 dB re 1 μ Pa zones during pile driving. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 354.)
- Clearwater has been asked to provide the method of waterbody crossing for alternatives, including any unnamed water bodies such as irrigation and flood control drainages, ditches, and channels. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 356.)
- Clearwater has been asked to include emissions estimates for the Installation of Anchor Piles and Mooring Lines at the port. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 370.)

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- Clearwater has been asked to indicate for the HDD beach crossing whether emission calculations are based on operation of 2 mud pumps or 4 mud pumps. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 372.)
- Clearwater has been asked for onshore pipelines to provide the number of Trucks per Day for all trucks. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 377.)
- Clearwater has been asked to indicate the sulfur content that was used to calculate SO₂ emission factors. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 378.)
- Clearwater has been asked to provide a reference for horsepower of all equipment. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 379.)
- Clearwater has been asked to provide a rationale for Load percentages listed for equipment. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 380.)
- Clearwater has been asked for Offshore Pipeline Installation to provide emissions for the anchor tugs, and pipe carrier barge/tug calculated with an emission factor in units of g/kW-hr and units of gallons/day instead of horsepower (hp), as appropriate. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 389 and 391.)
- Clearwater has been asked to provide fugitive dust emissions associated with Project/commuting vehicles traveling on paved roads and from “track-out” from construction sites. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 392.)
- Clearwater has been asked about vessels trips that are anticipated between the Project site and the Port of LA/LB. Clearwater has been asked to provide emissions for the South Coast Air Basin (SCAB) to include emissions from vessels that operate in SCAB waters during construction. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 393.)
- Clearwater has been asked to list existing sanitary effluent discharge facilities that may be used for discharge of hydrostatic test waters, including their locations and contact information. What is the maximum volume of water that each facility can accept? What are their testing requirements? Clearwater has been asked to explain how the coordination of discharge of the hydrostatic and groundwater will occur such that the capacity of receiving facility and effluent limits are not exceeded. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 395.)
- Clearwater has been asked to provide information as to whether drilling procedures for the shore crossing and onshore waterbody crossings require additives to the drilling mud.

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Clearwater has been asked to specify what these additives are, and what their potential environmental impacts would be in the event of an accidental release. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 396.)

- Clearwater has been asked to provide a habitat map for the location of the HDD exit point and all anchor locations from side scan sonar and diving survey results. Clearwater has been asked to provide a pre-drilling report that discusses the results of the survey and indicates whether sensitive resources are present within the area. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 397.)
- Clearwater has been asked to provide a clear description and drawing of the proposed location of the discharge pipe and compare with alternative locations for the discharge pipe in terms of impacts on water quality and marine biota. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 398.)
- Clearwater has been asked to clarify the number of anchor locations that would be required during offshore pipeline installation. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 399.)
- Clearwater has been asked to provide a statement of project purpose and need. Clearwater has been asked to demonstrate the need for natural gas (particularly LNG) as an energy source, providing information on the supply and demand for natural gas in California. The recent approval of the North Baja Expansion project could influence this needs analysis. How will the need for additional sources of natural gas be affected by the increasing development of renewable energy sources? How will this project help to supply energy diversification? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 400.)
- Clearwater has been asked with regards to LNG carrier approach routes and operations through the U. S. Navy's Point Mugu Sea Range and other DOD operations to provide a map of the routes showing positions relative to the Sea Range and other DOD operations for both LNG carrier transit and deepwater port facilities and operations. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 401.)
- Clearwater has been asked to provide the maximum number of LNG carriers that could dock at the port in a given year? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 401.)
- Clearwater has been asked what is the maximum annual send-out of natural gas, in terms of billion cubic feet per year (Bcf/yr)? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 403.)
- Clearwater has been asked what water would be used for turbine cooling water if condensed water from the AAVs is not available? Agency Data Requests on this same

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subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 404.)

- Clearwater was asked if it would be able to accept LNG carriers ranging in size from 70,000 m³ to 210,000 m³, and if so, what is the anticipated minimum and maximum time an LNG carrier would be docked at the port for unloading? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 408.)
- Clearwater has been asked to provide survey reports for sensitive plant and wildlife species for those areas to which it had access and provide details of informal consultation with the agencies (FWS, NMFS, CDFG) regarding specific surveys and level of effort recommended, including recommended survey protocols, sections of proposed alignments where surveys were not required, species for which surveys were not required, points of contact, meeting reports, phone logs, e-mails, and any other communications with state and federal agency officials regarding this topic. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 409.)
- Clearwater has been asked to provide the wetland survey report and a copy of its wetland permit application to the U.S. Army Corps of Engineers (USACE), and records of any consultation with the USACE or state agencies with wetland permitting jurisdiction regarding level of effort and methodologies required for proposed and alternative alignments. The permit application to USACE would include at a minimum: photoalignment sheets showing by milepost the locations and boundaries of all jurisdictional wetlands for all proposed and alternative pipelines; text describing the vegetation, soils and hydrology found in each jurisdictional wetland; copies of field delineation data sheets; acres or cubic yards of Section 10 waters, acres of Section 404 wetlands and acres of Section 404 other waters of the U.S. that would be affected during both construction and operation on each pipeline alignment; and text describing the methodology used to delineate each wetland. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 410.)
- Clearwater has been asked to identify by milepost the sections of proposed and alternative pipeline alignments for which wetland and protected species surveys have not been completed, including the reason that surveys were not completed. Clearwater has been asked to provide documentation of communications (i.e., phone logs, e-mail, meeting reports, etc.) with landowners and/or relevant federal and state resource agencies regarding justification for not completing surveys, and/or proof that access was denied for each section of the pipeline alignment for which surveys were not completed. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 411.)
- Clearwater has been asked to clarify whether special-status species were adequately covered by its survey efforts. Clearwater has been asked to provide evidence that alternative alignments were surveyed for sensitive plants or wildlife for all alternative

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onshore alignments. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 412.)

- Clearwater has been asked to provide clarification as to whether surveys for riparian-dependent bird species are not needed because pipeline installation would use HDD or existing infrastructures. HDD has the potential of frac-outs, which could cover potential forage and nesting habitat with bentonite, thus use of HDD still may result in adverse impacts. Installation of the pipeline under existing bridges would minimize waterbody crossing impacts in comparison with trenching, but it is likely that equipment to install the pipe under existing bridges and staging areas associated with this type of installation would have at least minor impacts on riparian dependent species. Clearwater has been asked to provide documentation of consultation with FWS and CDFG in determining the need/effort level of surveys for riparian-dependent bird species. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 413.)
- Clearwater has been asked to include existing ROWs in the natural resource surveys for the proposed project, including threatened and endangered plant and wildlife surveys and wetland delineations for proposed and alternative pipeline alignments. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 414.)
- Clearwater has been asked to provide photoalignment sheets for all proposed and alternative pipeline alignments, clearly showing existing pipelines, existing ROWs, new pipelines, and new construction and operation ROWs. In addition, Clearwater has been asked to provide a table clearly indicating locations where its proposed and alternative pipeline alignments and associated construction and operation ROWs would fall outside of existing ROWs. Clearwater has been asked to identify these locations by milepost, and indicate width of the new construction or operation ROW that would fall outside of an existing ROW. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 415.)
- Clearwater has been asked to identify the potential range, in terms of heating value and Wobbe Number, of natural gas that is expected to be delivered to the port. Clearwater has been asked to specify the potential sources of LNG that were used in determining these ranges of heating values and Wobbe Numbers. How will the gas be treated to ensure that its heating value and average Wobbe Number do not exceed those of gas currently delivered into California? If higher chain hydrocarbon removal is contemplated, how will it be accomplished? Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 417.)
- The current average Wobbe Number of natural gas in the SoCalGas System in the South Coast Air Basin is 1332. The South Coast Air Quality Management District has argued that natural gas imported from LNG terminals should have a Wobbe Number no greater than 1360.

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- a) Under the Project as proposed, is there a potential for the Project to introduce natural gas to the SoCalGas system with a Wobbe Number greater than 1332?
- b) If yes to (a), would a nitrogen plant be capable of treating imported gas so that all natural gas introduced to the SoCalGas system has a Wobbe Number less than or equal to 1332?
- c) If yes to (b), provide backup calculations and information that show Wobbe Number and nitrogen content before and after nitrogen injection for potential sources of LNG.
- d) Under the Project as proposed, is there a potential for the Project to introduce natural gas to the SoCalGas system with a Wobbe Number greater than 1360?
- e) If yes to (d), would a nitrogen plant be capable of treating imported gas so that all natural gas introduced to the SoCalGas system has a Wobbe Number less than or equal to 1360?
- f) If yes to (e), provide backup calculations and information that show Wobbe Number and nitrogen content before and after nitrogen injection for potential sources of LNG. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 418.)
- Clearwater has been asked to provide an estimate of the potential hourly and annual emissions of CO₂ and other greenhouse gases (GHGs) that would be generated due to all Project-related construction activities. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 419.)
 - Clearwater has been asked to provide the rationale for using the natural gas sources it has identified in its application in developing emission estimates. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 420.)
 - Clearwater has been asked to confirm that the Wobbe Number it assumes is based on the lower heating value (LHV). Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 421.)
 - Clearwater has been asked to provide revised emission estimates for Project equipment using differing types of natural gas that represent the full range of Wobbe Number and heating value of natural gas that could be introduced. It is recommended to use a minimum of four (4) types of natural gas having a Wobbe Number at or near 1279, 1332, 1360, and 1385. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 422.)
 - Clearwater has been asked whether the type of gases present in boil-off gas differ from regasified LNG? If yes, provide a profile of boil-off gas that includes the percentage of each type gas (i.e., methane, nitrogen, other hydrocarbons) and estimated heating value

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and Wobbe Number. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 423.)

- CSLC has asserted that a State of California issue that needs to be addressed is the provision of a “life cycle” emission inventory that details the estimated annual emissions of CO₂ and other GHGs from all production/transportation components associated with the natural gas to be delivered under this Project. State Lands asserts that the emission inventory should include, at a minimum, all GHG emissions associated with the following “life cycle” components:
 - Natural gas extraction and production;
 - Delivery of natural gas from point of extraction to the liquefaction plant;
 - Liquefaction of the natural gas to LNG;
 - As applicable, delivery of LNG from the liquefaction plant to storage facilities;
 - Shipment of LNG via LNG carriers from liquefaction plant (or storage facilities) to Port;
 - Port operations;
 - Distribution of natural gas through onshore pipeline infrastructure;
 - and
 - Combustion of natural gas by end-users.

State Lands requested that the emission inventory should also incorporate all GHG emissions associated with Project construction, start-up, and future decommissioning. Assuming State Lands is correct that there is legal authority for requiring such information in a CEQA document, Oceanway should also be required to provide this same information for its project. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 424.)

- Clearwater has been asked to provide information on the need for the natural gas that would be supplied by the project. Specifically, the market study should include:
 - A demand forecast for natural gas supplied by the project under different price scenarios (high, low, most likely)—for the lifetime of the project.
 - A map of sources, transport distances and costs for LNG supplied to the project.
 - A description of how the project would fit in the gas supply/demand balance in California over the lifetime of the project. Please include the importation of gas through Mexico at project inception and in the future in your assessment.
 - A description of how the open access provision of the proposed project would affect the natural gas market in California in terms of

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diversity of supply and reliability—how and why is this important? How does it differ from a dedicated facility? Also address pass through versus displacement of natural gas.

- Other information addressing how the project would affect the natural gas market in California over the lifetime of the project.

Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 425.)

- As a part of identifying potential impacts to biological resources, CEQA requires technical reports be completed that include the survey methodology used, the dates the surveys were conducted, all information collected from the field surveys, database and scientific literature searches, and the results of all pre-consultations with resource agencies. Direct and indirect impacts to wetlands as a result of project implementation will need to be quantified as acreage impacted from all proposed project activities, including staging and HDD pullback areas. Mitigation measures must also be identified if significant impacts cannot be avoided. With regard to extra work spaces (e.g., staging and HDD pullback areas), Clearwater has been asked to confirm that their boundaries will not fall outside the proposed 100 foot rights-of-way, and identify their specific locations within the rights-of-way. Agency Data Requests on this same subject should be promulgated on Oceanway. (Refer to Clearwater Data Request No. 428.)