DEIS Problems in Evaluating Surface Water and Wetlands Impacts

Always include info about any waters and wetlands you're familiar with!

The conclusions reached by the DEIS are based on very incomplete information. Additional supplemental information has not been consolidated as part of the DEIS to fully disclose and enable evaluation of the potential impacts of the proposed ACP on water resources. The following points represent just a sample of the critical information that's not included

- Detailed site-specific crossing plans (e.g., locations of temporary bridges, bridge types, cofferdam locations, water discharge structure locations, pump locations) and mitigation measures (e.g., analysis of alternatives to reduce impacts, restoration requirements, avoidance of cumulative impacts);
- A detailed evaluation of flood zones and susceptibility of property through which the pipeline is proposed to pass to fully define potential water quality impacts of tropical storms and/or hurricanes. Information on Special Flood Hazard Areas is inadequate and requires updating based on recent historic flooding events in the watersheds through which the proposed ACP would pass:
- Pre- and post-construction water quality monitoring is not sufficiently defined to ensure accurate assessment of impacts resulting from construction activities. A properly designed monitoring plan is required, including sampling timeline(s), location(s), replication, controls, etc.
- The assessment of impacts associated with wetlands crossings and disruption is incomplete, and must take into account wetland types and significance, susceptibility to fragmentation and irreversible impacts, including those associated with ecological services such as water filtration, flood control, and biotic community impacts, and proposed mitigation of these potential impacts.
- There is insufficient detail regarding the source water for hydrostatic testing, impacts on localized water quantity, and the disposal of contaminated water following "pigging".
- Erosion, sedimentation and turbidity are identified as potential water quality impacts but there is insufficient detail to fully evaluate impacts from land cover changes resulting from construction and operation activities, impacts on aquatic life (benthic and pelagic), and reliance on recommended Best Management Practices (BMPs) as mitigation for these identified issues.
- Additional education and competency requirements must be prescribed for the proposed Environmental Inspectors (EIs) who will be charged with the on-the-ground responsibility for ensuring compliance with a variety of plans (e.g., SPCC Plan, FERC Plan and Procedures, etc.) and environmental protection and restoration requirements.
- There is insufficient evaluation of cumulative impacts of construction and operation activities on watersheds. Vague assertions of minimal or no significant impact are unsubstantiated.

- The DEIS does not evaluate, nor account for, nor acknowledge the potential for impacts to headwater streams and wetlands of the Lumber River, a state recognized Natural and Scenic River and a federally recognized Wild and Scenic River.

These deficiencies are representative of the information that is necessary for FERC to fully evaluate the environmental impacts of the proposed ACP and to allow the public to fully evaluate these impacts and to meaningfully participate in the NEPA process.