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Association of Oil Pipe Lines

# **COASTAL ECO USAs Questions for Consideration**

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# Coastal Eco USAs – Key Considerations

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- **High Consequence Areas (HCAs) are an important tool for industry.** These sensitive environments are already covered under the current HCA definition:
- **Sensitive Species** – *globally imperiled and federally threatened/endangered plants, animals, & ecological communities*
  - **Public Drinking Water Sources** – *groundwater wells, springs, & surface water intakes*
  - **Populated Areas**
  - **Commercially Navigable Waterways**

# Coastal Eco USAs – Key Considerations

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- Operators use HCAs to prioritize resource allocation when responding to anomalies.
- **HCAs do not drive spill response – a spill is of the highest priority regardless of where the HCA is located.**
- **HCAs do drive the repair scheduling of anomalies.**  
They are not used to avoid repairing an anomaly.
  - #1 – How severe is the irregularity?
  - #2 – Is it located on a segment that could affect an HCA?

# Coastal Eco USAs – Key Considerations

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- **The current HCA definition is based in environmental science:**
  - **Ecological USAs** are places where a sensitive species has been observed. They are not places of potential habitat for a sensitive species.
  - **Drinking Water USAs** are wells & intakes that give us drinking water.
  - **Populated Areas** are where people live, work, & play.
  - **Commercially Navigable Waterways** are crucial to our nation's commerce and defense.

# Coastal Eco USAs – Key Considerations

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- The Congressional mandate is to include the Great Lakes, coastal beaches, and marine coastal waters as **USA ecological resources**.
- **“USA”** stands for **Unusually Sensitive Area** – an area that is unusually sensitive to environmental damage from a hazardous liquid pipeline release. That is, an area where a pipeline rupture would likely cause permanent or long-term environmental damage.

# Coastal Eco USAs – Key Considerations

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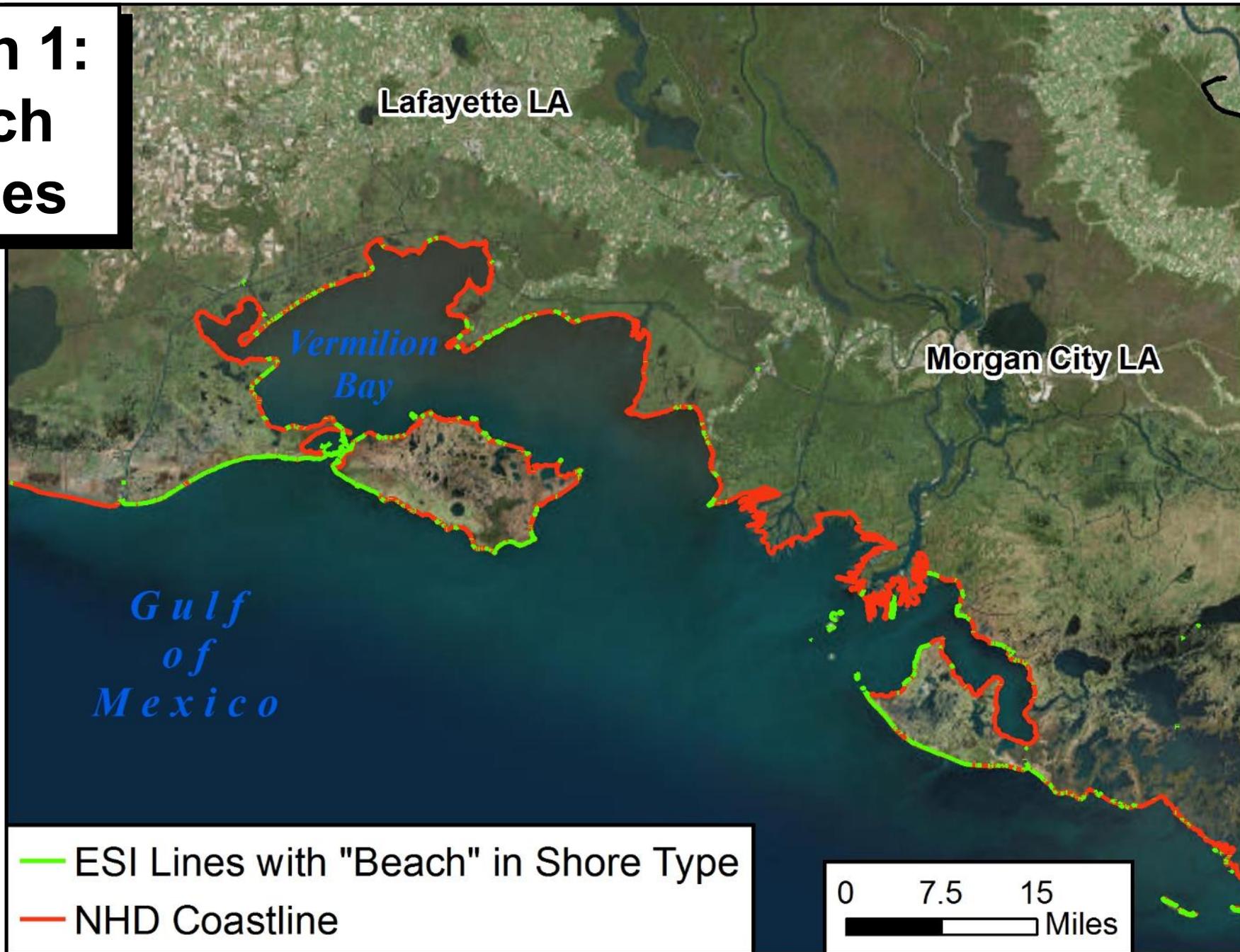
- **These new HCAs should also be based in science:**
  - **Specifically, the science of ecology**, *“the branch of biology that deals with the relations of organisms to one another and to their physical surroundings”*.
- To honor the intent of Congress, we must keep these concepts front & center when formulating a definition:
  - **Objectively grounded in environmental science**
  - **Undiminished utility as a prioritization tool**

## Coastal Eco USAs – More Research is Needed

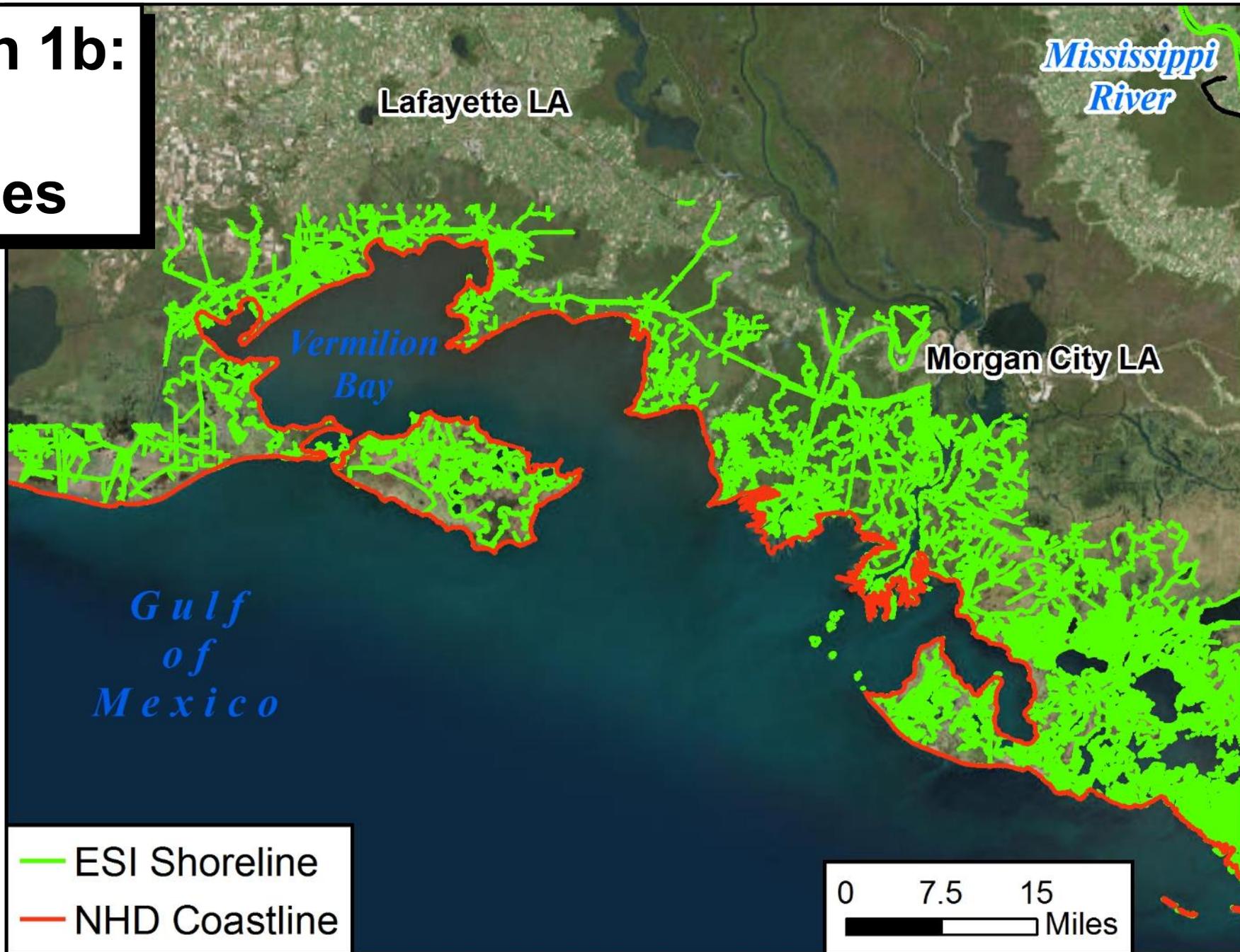
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- **Coastal states have wide variations in shoreline type:**
  - Some are rugged & precipitous like northern CA
  - Some are broad and flat like SC beaches
  - And some beaches are simply disappearing like in LA
- **These new HCAs are important and the GIS data that will define them are complex.**
  - Further research is needed to review the available GIS data for shorelines of representative states along the Great Lakes, Gulf Coast, and Atlantic and Pacific Oceans.
  - The next few slides use Louisiana as an example.

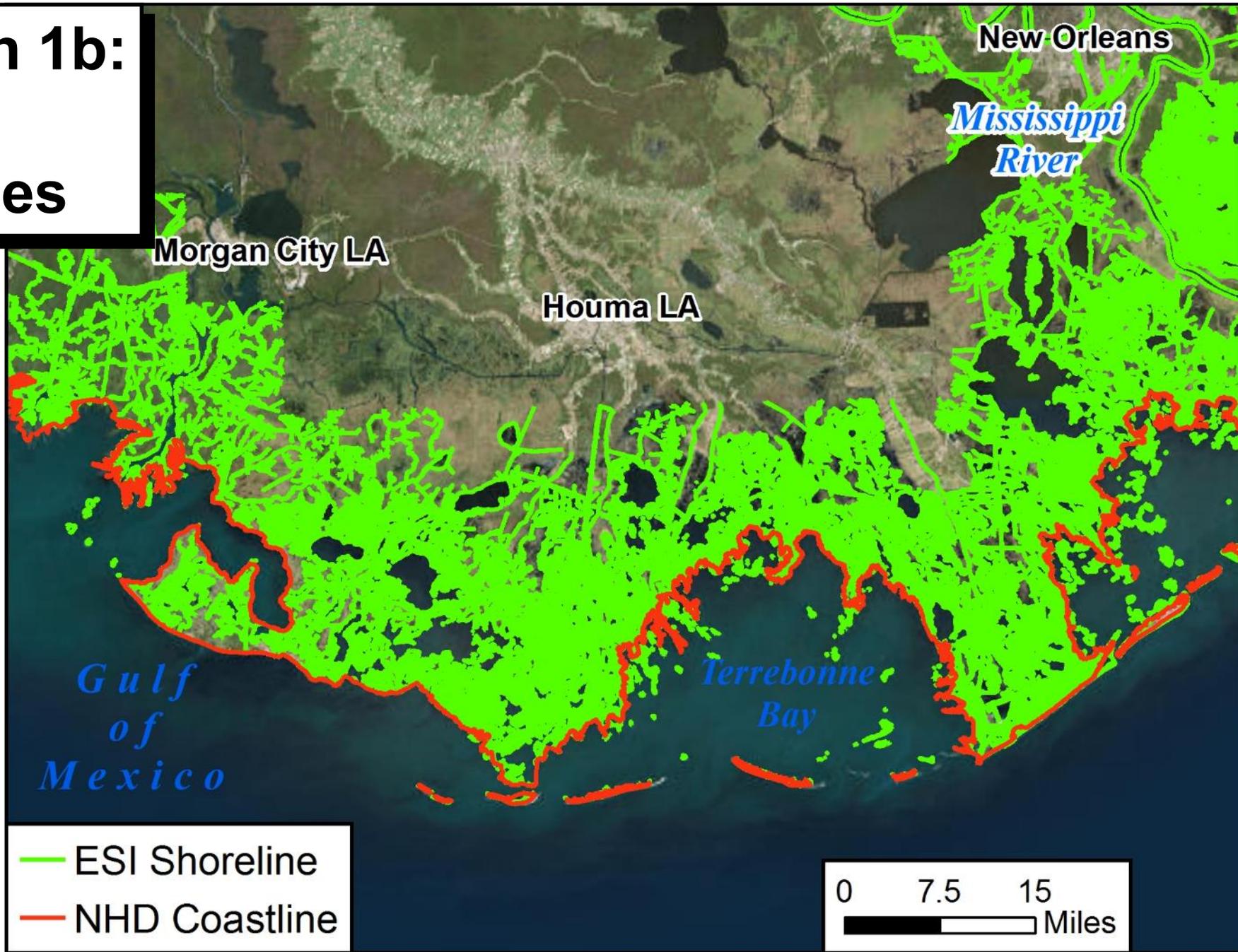
# Question 1: ESI Beach Shorelines



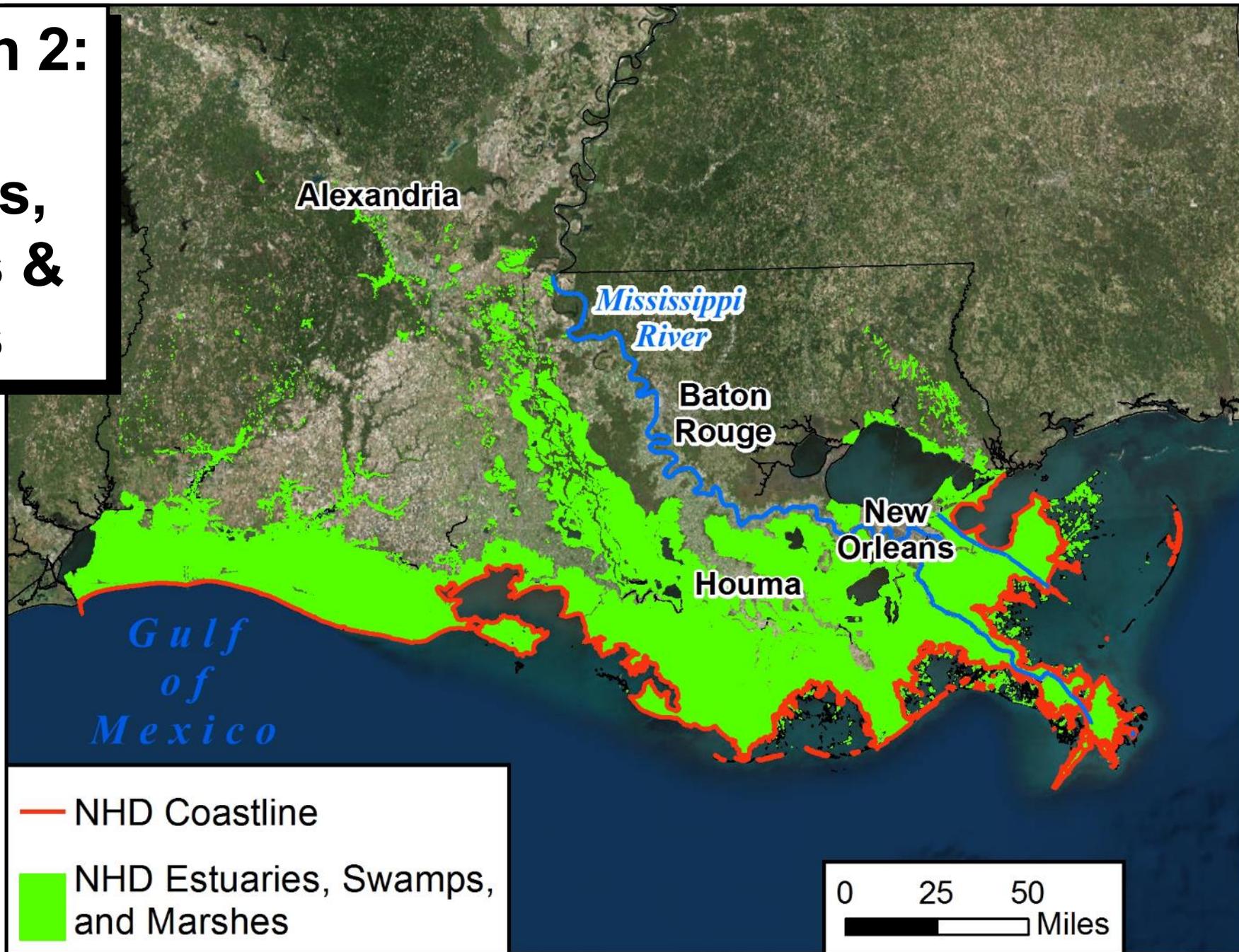
**Question 1b:  
All ESI  
Shorelines**



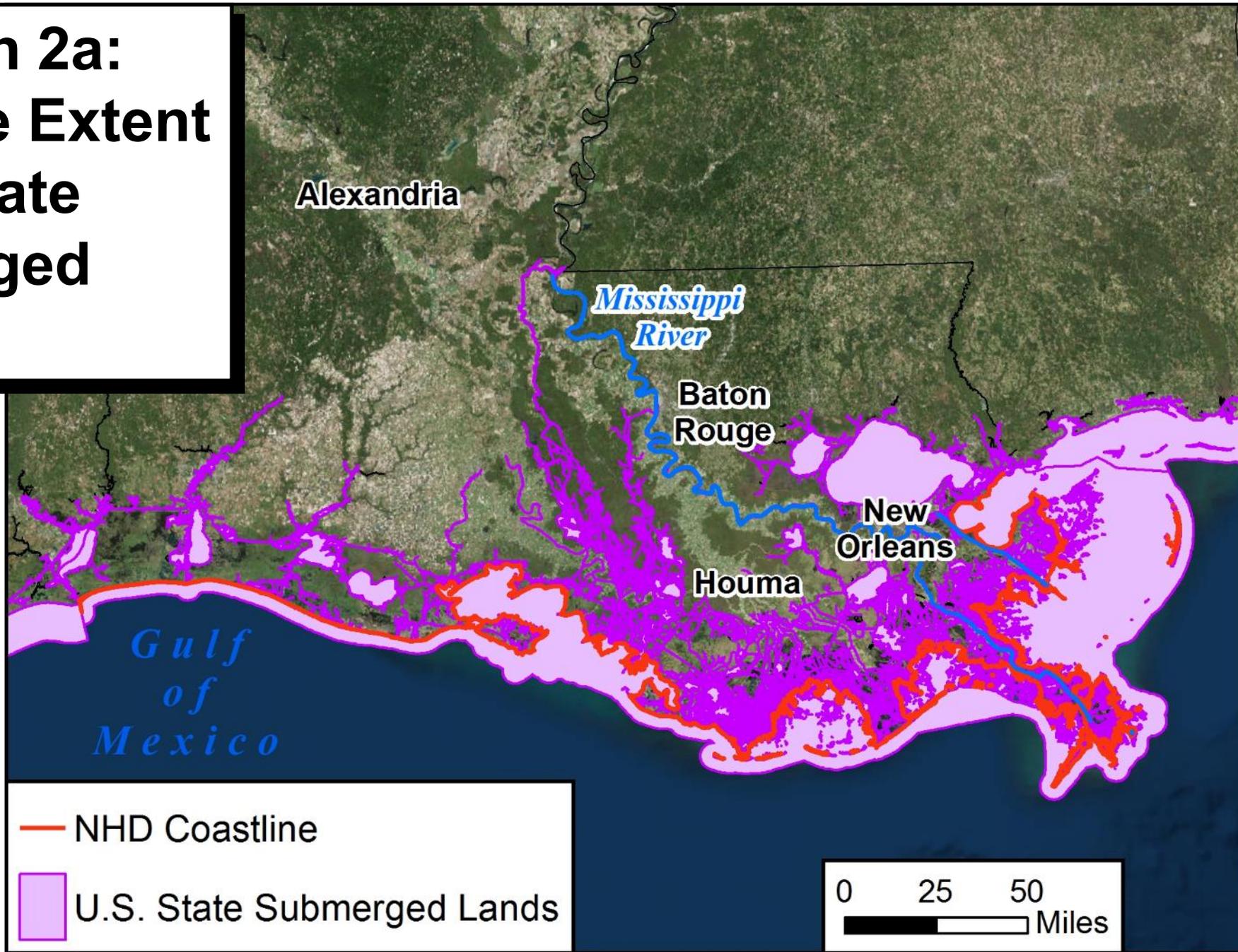
**Question 1b:  
All ESI  
Shorelines**



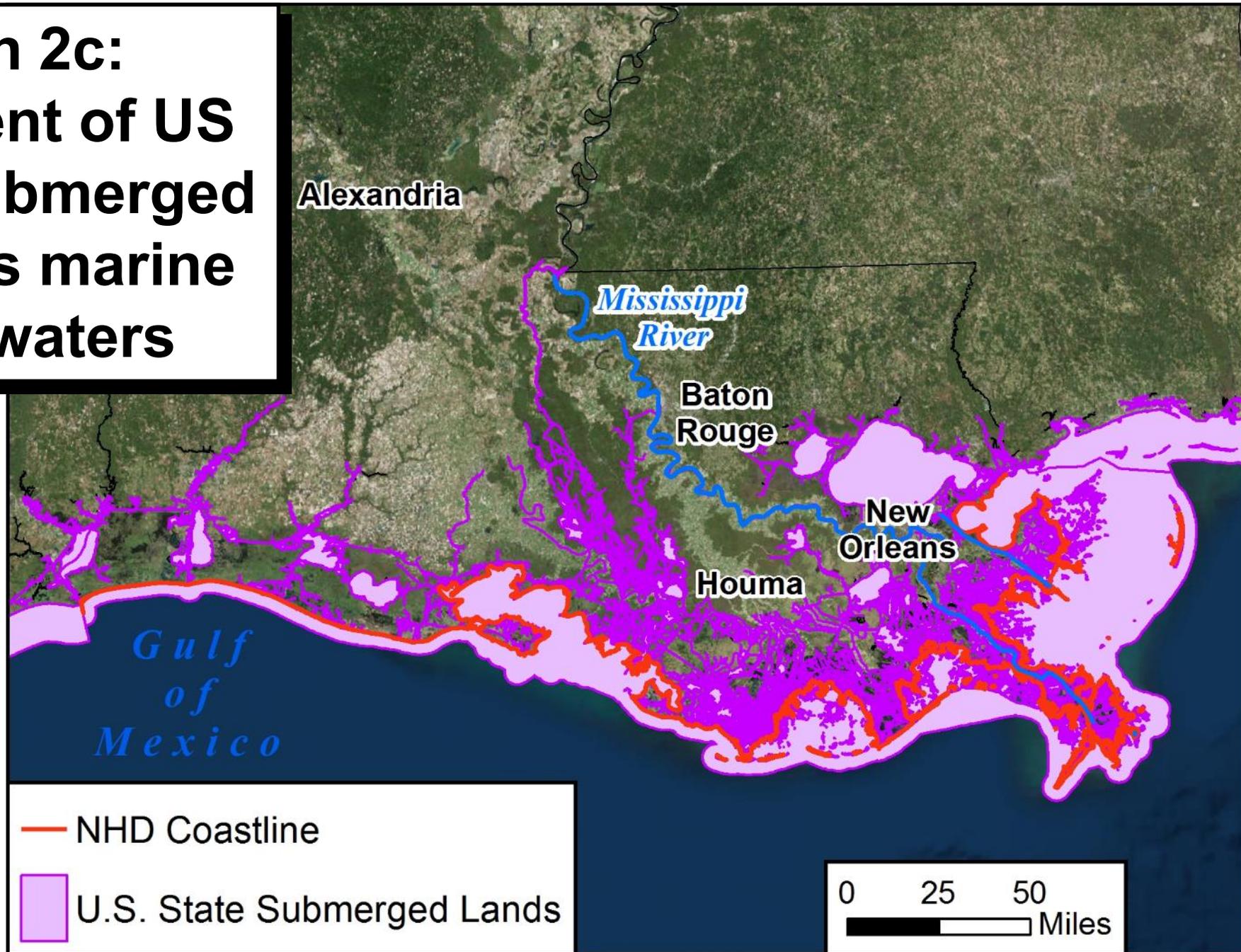
# Question 2: NHD Estuaries, Swamps & Marshes



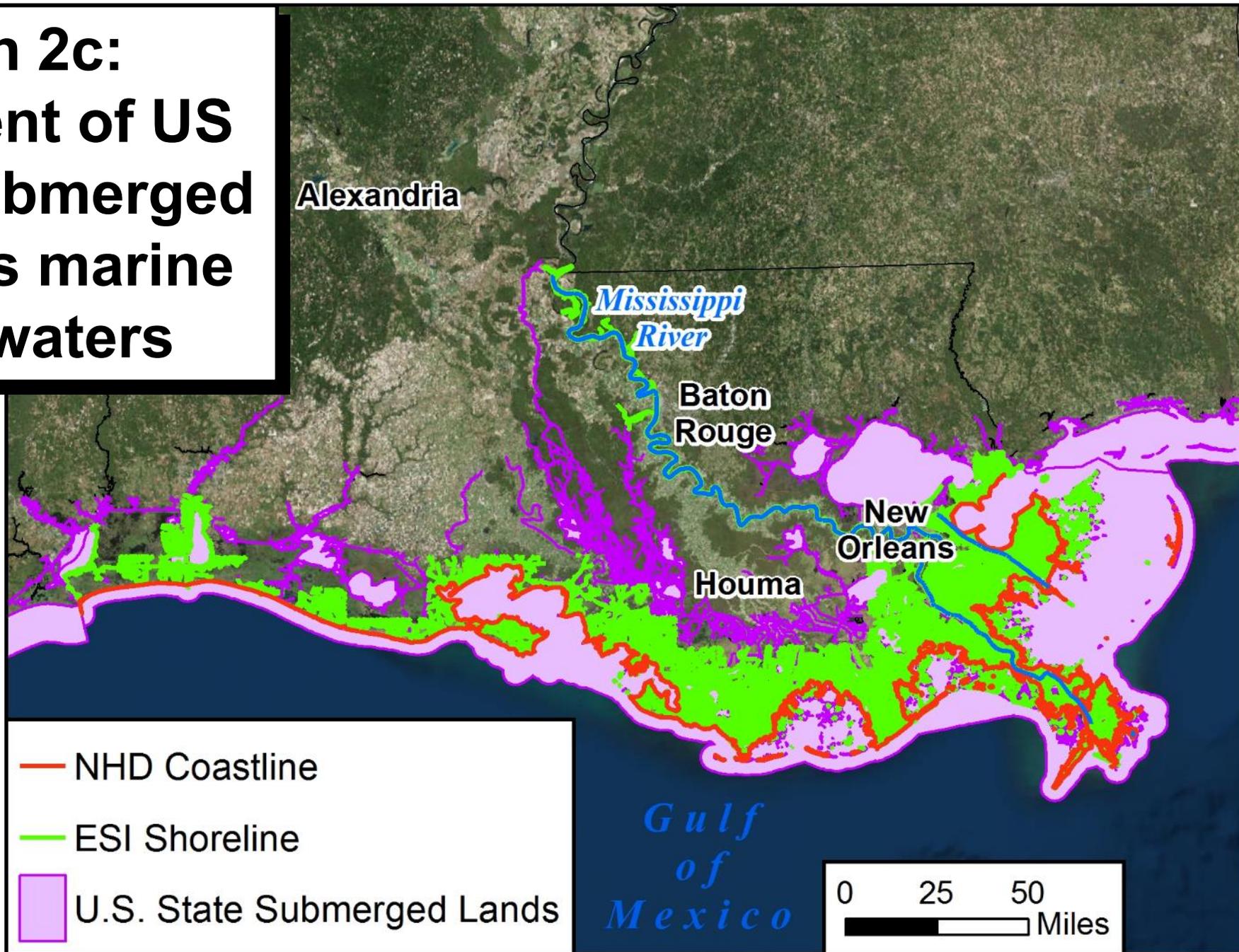
# Question 2a: Offshore Extent of US State Submerged Lands



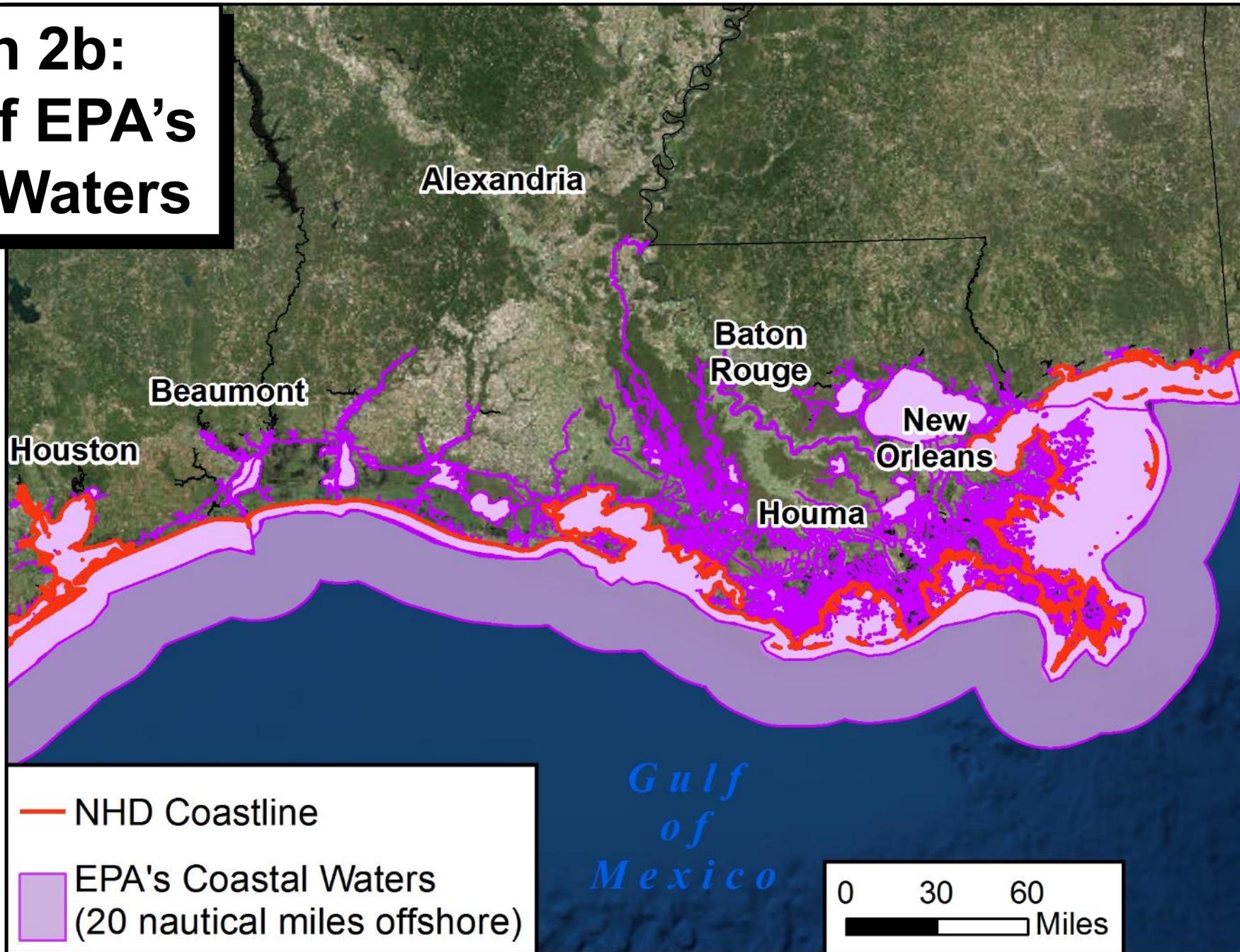
**Question 2c:  
Full extent of US  
State Submerged  
Lands as marine  
coastal waters**



**Question 2c:  
Full extent of US  
State Submerged  
Lands as marine  
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# Question 2b: Extent of EPA's Coastal Waters



## Coastal Eco USAs – Other Considerations

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- **Do inland water bodies include coastal beaches?**
  - The mandate states these new HCAs must be “USA ecological resources”.
  - Beaches along major rivers and inland water bodies are not ecologically sensitive by their nature.
  - Some do provide habitat for sensitive species, but these areas are already marked as existing ecological USAs. There is no gap to fill here.

## Coastal Eco USAs – Other Considerations

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- **Combining coastal & marine HCAs with existing eco USAs**
  - The definitions must remain separate and distinct from one another.
  - Existing eco USAs are based on objective scientific observations. These new USAs will be mapped with jurisdictional boundaries that are based in policy. Policy can change over time. It's important to be specific about the intent for future generations – which is to offer more protection for ecological resources along our nation's land/ocean and land/Great Lakes interface.

## Coastal Eco USAs – Final Thoughts

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- **The definition for coastal and marine HCAs needs to be carefully thought through. This was done for the definition of the existing eco USAs which have served us well for the last 20 years.**
  - It must be based in environmental science.
  - It must use GIS data available today, yet be able to handle improvements and extensions in the future.
  - It must provide continuing undiminished utility as a prioritization tool.