



UNITED FOR A HEALTHY GULF

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26 September, 2016

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State of Louisiana
Department of Environmental Quality
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re: **MVN-2016-00444-WPP** - Proposed Energy Transmission Line (**WQC 160831-01**)
MVN-2016-00876-MG - Lake Charles Methanol Tank Farm (**WQC 160826-02**)

Dear Mr. Duplantis, Ms. Johnson, Mr. Gaspard, and Ms. Wilcox,

I am writing on behalf of Gulf Restoration Network (“GRN”), a diverse coalition of individual citizens and local, regional, and national organizations committed to uniting and empowering people to protect and restore the natural resources of the Gulf of Mexico. We have serious concerns about the application for a Section 404 Permit (**MVN-2016-00444-WPP**) and Water Quality Certification (“WQC,” **WQC 160831-01**) submitted to the United States Army Corps of Engineers (“Corps”) and Louisiana Department of Environmental Quality (“LDEQ”), respectively, by Entergy Louisiana, LLC (“Entergy”). We are also seriously concerned about the application for a Section 404 Permit (**MVN-2016-00876-MG**) and WQC (**WQC 160826-02**) submitted to the Corps and LDEQ by Lake Charles Harbor and Terminal District (“District”).

Entergy hopes to install new high-voltage electrical transmission lines that would support the expansion of local industrial facilities. The project would permanently impact 63.04 acres of priceless forested wetlands, alongside untold amounts of “temporary” wetland impacts. The

District wishes to construct a nearby methanol-storage facility that would permanently impact 5.94 wetland acres. Regarding compensatory plans, both Entergy and the District simply mention a possible future purchase of mitigation-bank credits. Presently, neither applicant appears to have avoided and minimized these wetland impacts to the maximum extents practicable.

These two proposals are just the latest in the efforts to cement an "Energy Empire"¹ within the Lower Calcasieu watershed, southern Louisiana, and the Gulf Coast as a whole. The additive and multiplicative effects of continued fossil-fuel development cannot be ignored, especially as the race to export liquefied natural gas ("LNG") intensifies. The foreseeable wetland impacts from plants, pipelines, railyards, compressor stations, housing developments, transportation projects, et cetera, et cetera will indeed be significant. Putting highly volatile facilities in intense proximity to one another, in an extremely vulnerable floodplain, raises concerns about the safety of community members while also threatening other existing facilities and navigation efforts. The indirect impacts are immense, rippling across wetlands in the Lower Calcasieu, Louisiana Coast, the Gulf Coast, and even the entire country.

The connected actions related to industrial expansion and LNG export warrant the development of a Programmatic Environmental Impact Statement (PEIS), perhaps even multiple. This is the best tool available for the Corps to assess the scope of this regional fossil-fuel effort and its impacts to coastal wetlands and waterbodies.

*We incorporate our previous comments regarding PEIS necessity by reference here.*²

¹ From "[Current and Future Development in Southwest Louisiana—David Conner, Southwest Louisiana Economic Development Alliance](http://coastal.la.gov/calendar/?y=2014)" Gov's Advisory Commission, 6 Aug 2014 Ret. from <http://coastal.la.gov/calendar/?y=2014>

² See GRN's Public Comments on the proposed Port Cameron (**MVN-2013-02424-MB, 160621-01**), as filed 7/28/16: <https://drive.google.com/file/d/0Bzl9AAmVF3YjcXktS18yTEo0X00/view?usp=sharing>

To briefly summarize, we at GRN oppose Entergy and the District's requests for Section 404 Permits and Water Quality Certifications based on the following concerns:

- The proposals are inconsistent with Louisiana's Comprehensive Master Plan for a Sustainable Coast and a 2016 Executive Order.
- Entergy and the District have failed to thoroughly evaluate project alternatives.
- Climate must be considered in the permitting process.
- Direct, indirect, secondary, and cumulative impacts remain unassessed.
- Entergy and the District must develop disaster-response plans and perform a quantitative risk assessment. Local floodplain officials should be notified of these proposals, since the region is vulnerable to flooding.
- The mitigation plans for the proposals are incomplete.
- The proposals do not appear to offer public benefit or be in the public interest.
- The proposals warrant a Programmatic, or Area-Wide, Environmental Impact Statement (PEIS).

As detailed in our July comments, the Corps and LDEQ must seriously consider the mandates put forth by the Clean Water Act, Louisiana's *Comprehensive Master Plan for a Sustainable Coast*, Governor John Bel Edwards, Louisiana's Constitution, the Louisiana Supreme Court, and the Council on Environmental Quality.

Over 11 years after Louisiana was lost, in an era following the Paris Agreement, the climate impacts of connected actions must be examined critically. This includes the climate impacts *upon connected actions* as well. A detailed environmental assessment evaluating the direct, indirect, and cumulative impacts of Entergy and the District's proposals in the context of the present LNG push must be incorporated into the decisionmaking process for the proposed permits. Public hearings are the perfect complements to these scientific investigations.

In order to keep us and the public properly informed, we request notification of denials, approvals, and/or changes to Entergy and the District's requests for Section 404 Permits and Water Quality Certifications. We look forward to a written response.

For a healthy Gulf,
[sent via e-mail]



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