



State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF COASTAL MANAGEMENT

James W. Little, Jr.
United States Army Corps of Engineers
New Orleans District
Attn: Regulatory Branch
7400 Leake Ave.
New Orleans, Louisiana 70118

Re: MVN-2015-02295-WII

Dear Mr. Little

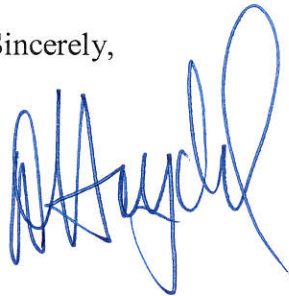
I am writing on behalf of the Atchafalaya Basin Program (ABP) of the Louisiana Department of Natural Resources (LDNR) concerning the 162.52-mile-long 24" crude oil pipeline that is planned by Bayou Bridge Pipeline, LLC; specifically, we are focused on the approximately 23 miles of pipeline that would cross the Atchafalaya River Floodway. The ABP is the state partner in the federal Atchafalaya Basin Floodway System Project. Our primary interest is to maintain or improve environmental quality in the Atchafalaya Basin, the nation's largest contiguous forested wetland, by managing water and sediment (LDNR 1998). Our program's goals are aligned with those of the United States Army Corps of Engineers' (USACE) master plan (USACE 2000) for the Atchafalaya Basin Floodway System Project. We have reviewed this permit application to assess the compatibility of the project with the goals of both the state and federal Atchafalaya Basin master plans. To that end, we have consulted with the scientists, technicians, and natural resources professionals who make up our Technical Advisory Group (TAG), and these comments are the result of those consultations.

As currently proposed, the pipeline would have approximately 3 feet of cover where it crosses through wetlands of the Atchafalaya Basin and would return ground elevations to pre-project conditions. In a properly functioning system, this would be sufficient to avoid damage to hydrological regimes; however, the location selected for the pipeline right of way (ROW) occurs near an existing ROW that was constructed with spoil banks that block north to south sheet flow in the Atchafalaya Basin. To compound the problem, flow through the existing pipeline canal has led to additional sedimentation at the margins of the canal that further impedes north to south flow. The proposed pipeline location would be located on that existing strip of unnaturally high land.

Placing a pipeline in this location with the minimum required cover would add to the cumulative effect of ecologically detrimental hydrologic alteration, and the pipeline would obstruct planned efforts to restore hydrologic function. The ABP and St. Martin Parish are planning projects to restore north to south flow in the swamps bisected by the proposed ROW. Additionally, the pipeline traverses the USACE's recently completed Buffalo Cove water management unit, and adaptive management is ongoing. Therefore, **we request that the pipeline be installed at a depth at or below that of the adjacent natural swamp.** This would require approximately 10 feet of cover, with the minimum required cover varying along the ROW according to local conditions. We recommend coordination with the ABP, St. Martin Parish, and the USACE Buffalo Cove project manager to ensure that the proposed pipeline does not interfere with restoration plans in the Beau Bayou, East Grand Lake, and Buffalo Cove water management units.

The USACE has the authority to require that the pipeline be lowered in the event that it impedes hydrologic restoration activities. We suggest that it would be appropriate to install the pipeline at the correct depth at the outset to avoid having to re-disturb wetlands to lower the pipeline in a year or two. Please contact me with any questions or to schedule a meeting to discuss these concerns.

Sincerely,



Don Haydel, Director
Atchafalaya Basin Program
Louisiana Department of Natural Resources

Attachments

CC: April Newman, ABP, LDNR
David Walther, USFWS
Dan Kroes, USGS
William Kelso, LSU
Bobby Reed, LDFW
Joey Breaux, LDAF
Bijan Sharafkhani, LDEQ
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John Eblen, USACE
Guy Cormier, St. Martin Parish Government

References:

Louisiana Department of Natural Resources. Atchafalaya Basin Floodway System Louisiana Project, State Master Plan. 1998.

New Orleans District, US Army Corps of Engineers. 2003. East Grand Lake After Action Report. Prepared by Waldemar S. Nelson and Company, Inc. and Gaea Consultants, LLC. 222 p.

US Army Corps of Engineers. 2000. Atchafalaya Basin Floodway System Project, Louisiana Master Plan.

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