

December 16,2005

Mr. Donald Silawsky:

Please find attached comments from the Corps of Engineers, Regulatory Branch, New Orleans District in response to the scoping period for the proposed expansion of the Strategic Petroleum Reserve. For further information and/or clarification of comments please feel free to contact Ronnie W. Duke at [REDACTED] or Martin Mayer at [REDACTED]. Thanks for giving us the opportunity to participate in the scoping process,

## Scoping Period Comments: Proposed SPR New/Expansion Sites

### **Proposed** New Sites Chacahoula

Facility encompasses approximately 285 acres of semi-permanently flooded bald **cypress**-tupelogum freshwater swamp in Lafourche Parish, Louisiana. Essential infrastructure includes approx. 139 miles of new pipeline.

#### Issues:

- Direct, secondary, cumulative impacts, short- and long-term, to high quality forested wetlands that provide vital wildlife habitat, fisheries support, floodwater storage, tidal buffer, recreation, aesthetics and water quality maintenance;
- Environmental threat from accidental brine/petroleum discharges into highly sensitive wetland areas necessitates contingency plans;
- High potential for ESA and/or cultural resource issues;
- Highly complex permitting involvement for proposed project and support facilities, with particularity to the practicability of less environmentally damaging alternative locations, pipeline alignments and facility designs;
- Extensive compensatory mitigation anticipated to offset impacts to high value wetland resources due to acreage affected and high environmental quality at the project site and proposed pipeline corridors;
- Impacts to essential transportation infrastructure (US Hwy 90, Hwy 20 and railroads) from proposed pipeline facilities;
- Support infrastructure may encroach on existing and planned hurricane protection and coastal restoration activities;
- Maritime impacts on navigation channels (GIWW, Bayou Lafourche, etc.).

## **Proposed New Sites Clovelly**

Project proposes collocation at the present Louisiana Offshore Oil Port (LOOP) petroleum storage terminal, utilizing existing LOOP infrastructure (i.e., caverns and pipelines) near Galliano, Louisiana, in Lafourche Parish.

### **Issues:**

Potential direct, secondary, cumulative impacts, short- and long term, to high quality intertidal brackish marsh from activities occurring primarily outside existing LOOP facilities. Resource concerns include wildlife habitat, EFH, tidal buffer, recreation, aesthetics and water quality maintenance;

Environmental threat from brine/petroleum discharges into sensitive wetland areas necessitates contingency plans;  
Potential for ESA and/or cultural resource issues;

The availability and practicability of alternatives that avoid and minimize environmental impacts must be addressed, -Compensatory mitigation will be required to offset impacts to important wetland resources at the project site;  
Project/support infrastructure may encroach on existing and planned hurricane protection and coastal restoration activities;

Proximity of the proposed site to the gulf coast makes it extremely vulnerable to being directly impacted by tropical storm and hurricane landfall.

Local maritime interests may be affected by construction activities and facilities.

## **Proposed Expansion of the Existing Bayou Choctaw Site**

Project proposes expansion of an existing SPR storage facility by on-site infrastructure upgrades at the location near Plaquemine, Louisiana, in Iberville Parish.

### Issues;

Potential direct, secondary, cumulative impacts, short- and long-term, to high quality bald cypress-tupelogum swamp associated with activities occurring within the footprint of the existing SPR facility. Resource concerns include fish and wildlife habitat, floodwater storage, recreation, aesthetics and water quality maintenance;

Environmental threat from brine/petroleum discharges into highly extremely sensitive wetland areas necessitates contingency plans;

Potential for ESA/cultural resource issues;

The availability and practicability of alternatives that avoid and minimize environmental impacts must be **addressed**;  
Compensatory mitigation will be required to offset impacts to important wetland resources at the project site;

Project/support infrastructure may encroach on existing and planned navigation and flood control projects;

Local maritime interests may be affected by construction activities.

## WEST HACKBERRY SPR STORAGE SITE

It appears from the drawings provided that the proposed Hackberry expansion would result in adversely impacting emergent wetlands that serve as habitat for numerous species of fish and wildlife species. Mitigation would be required for impacts to wetland resources.

Black Lake has been identified as an area capable of supporting various Coastal Restoration Projects. The proposed expansion of the Hackberry site into Black Lake could affect implementation of such restoration projects.

A less damaging alternative may be to consider storing the 15 million barrels targeted for Hackberry at another storage facility that could accommodate the 15 million barrels and will have to be constructed anyway in order to achieve additional storage of 273 million barrels,

With implementation of improvements as proposed, could the Hackberry site be capable of storing future reserves in excess of the 15 million barrel target capacity if necessary without further impacts to wetland resources?