



UNITED FOR A HEALTHY GULF

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Ben Sherman
Department of the Army
Corps of Engineers, New Orleans District
Operations Division
Eastern Evaluation Section
7400 Leake Avenue
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Benjamin.C.Sherman@usace.army.mil

re: **MVN 2016-01214 ES** - Twenty Four-inch Pipeline in Gulf of Mexico off of Plaquemines Parish

Dear Mr. Sherman,

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 are quite concerned about the application for a Section 10 Permit (**MVN 2016-01214 ES**) submitted to the United States Army Corps of Engineers (“Corps”) by Shell Pipeline Company LP (“Applicant”).

The Applicant requests Section 10 permitting for its proposed construction of a 90-mile, 24-inch pipeline for oil export (“Project”). The Applicant describes its project as a bidirectional gas pipeline, while the engineering drawings provided with the Corps public notice are explicit about “oil export.”¹ It therefore appears the Applicant expects to move both oil and gas between offshore and nearshore operations, depending where market need is greatest. This sort of private infrastructure has no place in Federal Waters.

The Mississippi Canyon is in fact a hot spot of ocean biodiversity. Its productivity supports whales, squid, and sea turtles, including the Northern Gulf Sperm Whale, Leatherback sea turtle, and countless others. Pipeline ROWs have even been shown to provide egress for the invasive lionfish. The Project can still spurn significant impacts without affecting special aquatic sites.

¹ Department of Army Section 10 Public Notice, as made available 10/31:
http://www.mvn.usace.army.mil/Portals/56/docs/regulatory/publicnotices/2016_1214_PN%20ALL.pdf?ver=2016-10-27-120311-400

As a federal agency, the Corps must consider climate during its decision-making process.² There are many tools available for this evaluation.³ The climate contribution from the Project must be comprehensively quantified, from the points of oil and gas extraction, to the climate costs of construction, to the pumping of material through the pipe, all the way to the end-use of refined products.⁴

"Activities that have a reasonably close causal relationship to the Federal action, such as those that may occur as a predicate for a proposed agency action or as a consequence of a proposed agency action, should be accounted for in the NEPA analysis. For example, NEPA reviews for proposed resource extraction and development projects typically include the reasonably foreseeable effects of various phases in the process, such as clearing land for the project, building access roads, extraction, transport, refining, processing, using the resource, disassembly, disposal, and reclamation"

Recognizing these connections allows for the 'total cost' of the Project to be calculated. All too often, unaccounted costs in the forms of environmental and health damages are externalized upon communities in coastal Louisiana and beyond. Examples include reduced flood protections, heightened spill risks, and the exhaustive other costs associated with a climate-disrupting reliance on fossil-fuel infrastructure.

Put plainly, the Project offers no public benefit and is outside the public interest. Developments of this scale typically masquerade as essential to American energy independence. Here, the Applicant hasn't even attempted to show that its project is crucial to national security. The Project is simply a money-making gamble. Again, it has no place in Federal Waters.

GRN opposes the Applicant's request for a Section 10 Permit. We hope the Corps will act upon these comments accordingly. We request notification of denials, approvals, and/or changes to the Applicant's request, to keep us and the public properly informed.

We look forward to a written response.

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



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Coastal Wetland Analyst

Gulf Restoration Network

² 81 FR 51866. at https://www.whitehouse.gov/sites/whitehouse.gov/files/documents/nepa_final_ghg_guidance.pdf

³ https://ceq.doe.gov/current_developments/GHG-accounting-tools.html

⁴ 81 FR 51866, page 4, page 14, as quoted.

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