January 9, 2020

Andi Zachary
Permit Analyst
Louisiana Department of Natural Resources
Office of Coastal Management
P.O. Box 44487
Baton Rouge, Louisiana 70804

Re: P20180379 - Request to Sever and Delay Joint Public Hearing on Tallgrass Energy’s Proposed Crude Oil Export Terminal (Plaquemines Liquids Terminal)

Dear Ms. Zachary,

On December 30, 2019, DNR issued notice of a public hearing to be held jointly with the Department of Environmental Quality on February 6, 2020 in Belle Chasse, Louisiana on the proposed Tallgrass crude oil export terminal (PLT- P20180379), also known as Plaquemines Liquids Terminal. We believe there are stark differences between the Part 70 air operating permit and the coastal use permit, which means that a joint meeting is inadvisable. For instance, it is important to thoroughly address impacts of Tallgrass oil export terminal on the Mid-Barataria Sediment Diversion (MBSD). As such, issues unique to each permit must be assessed and addressed with diligence and caution and this would be not be done in a joint meeting.

In April 2019, a Memorandum of Understanding (MOU) between the Louisiana Coastal Protection and Restoration Authority (CPRA) and Plaquemines, Port, Harbor and Terminal District (PPHTD) and Plaquemines Liquids Terminal, LLC (PLT) stipulated that sediment transport modelling and a navigation study would be conducted to assess impacts of the proposed Plaquemines Liquids Terminal on the MBSD. That MOU further stated that a subsequent Memorandum of Agreement (MOA) would be executed that would detail how the company plans to mitigate any impacts to wetland resources. While the navigation study has been published, the sediment transport modelling and the MOA have not and remain unavailable to the public. Without this information, we cannot give meaningful comments to the department on the CUP and consistency with the Coastal Master Plan.

Additionally, the public cannot comment on a document that, to our knowledge, does not exist.

Therefore, the undersigned groups request that the Louisiana Department of Natural Resources hold a separate public hearing from the Department of Environmental Quality and delay the Department of Natural Resources hearing until pertinent data about project impacts on the Mid-Barataria Sediment Diversion (including the commissioned sediment study and MOA) and a draft coastal use permit is published for public review on SONRIS. We urge you to provide a minimum of 30 days for public review and comment following publication of this critical information.

Thank you for your consideration on this matter.
Sincerely,

Environmental Defense Fund

National Wildlife Federation

National Audubon Society

Coalition to Restore Coastal Louisiana

Lake Pontchartrain Basin Foundation

Sierra Club

Healthy Gulf

Enclosure: Email Cover Ltr and Mem. of Understanding re: Tallgrass PLT Consistency Determination (Apr. 26, 2019).