



State of Louisiana  
DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF COASTAL MANAGEMENT

November 26, 2019

Matthew Layman  
Project Manager, U. S. Coast Guard

Yvette Fields  
Project Manager, MARAD

Via the Federal eRulemaking Portal: <http://www.regulations.gov>

RE: **C20190069**, Coastal Zone Consistency  
West Delta LNG, LLC  
MARAD  
U. S. Coast Guard  
Federal License or Permit  
Proposed Deepwater Port License for offshore facilities and pipelines for liquefied  
natural gas export, West Delta Blocks 44-47 and 26-28  
**Offshore, Louisiana**  
**Docket number MARAD-2019-0095**

Dear Ms. Fields and Mr. Layman:

On October 16, 2019, the Louisiana Department of Natural Resources, Office of Coastal Management (OCM) received a draft copy of the above referenced federal application, forwarded by the U. S. Coast Guard. As you are aware, pursuant to federal regulations at 15 CFR §930 Subpart D, the proposed liquefied natural gas export deepwater port is subject to review by the state for consistency with the Louisiana Coastal Resources Program (LCRP), which is the state's federally approved program under the Coastal Zone Management Act of 1972, as amended. The following comments are offered to allow your agencies and West Delta LNG, LLC to modify the application so that the project will be conducted in a manner consistent with the LCRP.

The Office of Coastal Management recommends the applicant reduce wetland impacts and avoid valuable oyster reef habitat.

The application describes the 30-inch pipeline which will link the offshore and onshore facilities, and notes that post-project decommissioning plans consist of abandoning the pipeline in place. Please be advised that the pipeline and offshore facility are located in offshore sediment resource areas which have been identified as potential sources of material for coastal restoration efforts in Louisiana. We recommend that the application be modified to discuss alternative placement and decommissioning strategies, including removal upon abandonment.

The Deepwater Port License Application states in several places that West Delta LNG, LLC submitted a Coastal Use Permit application and a Consistency determination to OCM in June of 2019 (See Volume I Section 11, Volume 1 Appendix B Attachment 10, Volume IIa Appendix C, and Volume IIb, Section 7.3.2). **Please be advised that no such applications have been received by this Office.** In order to review this activity, OCM must receive a copy of the federal application with all necessary data and information and a consistency certification as described at 15 CFR §930.57. Until the complete application is received by OCM, the consistency review period will not begin.

Thank you for the opportunity to comment on this draft application. If you have any questions regarding this matter, please contact Jeff Harris of the Consistency Section at [jeff.harris@la.gov](mailto:jeff.harris@la.gov) or (225) 342-7949 (Federal waters), or Ontario James of the Permits Section at [ontario.james@la.gov](mailto:ontario.james@la.gov) or (225) 342-7358 (State waters and onshore).

Sincerely yours,

**/S/ Charles Reulet**

Administrator

Interagency Affairs/Field Services Division

CR/MH/jdh