



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

February 8, 2011

Sandra Stiles
U.S. Army Corps of Engineers
New Orleans Environment Branch
P.O. Box 60267
New Orleans, LA 70160-0267

SUBJECT: Draft Individual Environmental Report Supplemental 15.a (IERS 15.a) titled West Bank and Vicinity, Lake Cataouatche Levee, Jefferson Parish, Louisiana

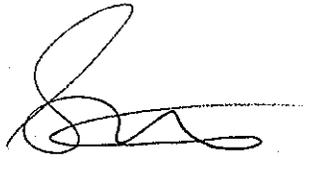
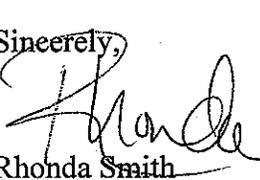
Dear Ms. Stiles:

The Environmental Protection Agency (EPA) Region 6 has received your correspondence, dated January 14, 2011, regarding the draft IERS 15.a. In accordance with the National Environmental Policy Act, and under Section 309 of the Clean Air Act, our agency is providing the following comments to assist you with the preparation of the final IERS 15.a:

- Section 2.2 Alternatives to the Proposed Action, *Up and Over*; provide a more detailed description of the necessity for up to four additional and currently planned levee lifts.
- The proposed work is projected to impact approximately 8 acres of intermittently drained wetlands habitat on the protected side, north of the Lake Cataouatche Levee, approximately 12.9 acres of open canal bottom within the Outer Cataouatche Canal, and approximately 14.5 acres of high quality wetlands south of the Lake Cataouatche Levee within the Jean Lafitte National Historical Park and Preserve (Park). Although the pipeline relocation is proposed to be accomplished via directional drilling, a technique which typically can serve to minimize impacts to surrounding areas, there may be another alternative in this case which might further reduce the adverse habitat impacts, particularly those to the wetlands within the Park. Accordingly, we would see a value in presenting a more thorough explanation of the feasibility of employing the "sleeve through a T-wall" alternative, which has been employed elsewhere in the Park for pipeline relocations.

We appreciate the opportunity to provide comments for draft IERS 15.a. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or macfarlane.john@epa.gov should you have any questions or concerns regarding this letter.

Sincerely,



Rhonda Smith
Chief, Office of Planning and
Coordination