



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

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July 29, 2025

U.S. Army Corps of Engineers, New Orleans District
Attention: Damon Morse
Public Notice: MVN-2011-03218-EDM
7400 Leake Avenue New Orleans. La., 70118-3651

RE: Application Number: MVN-2011-03218-EDM
Applicant: Air Products Blue Energy LLC Notice
Date: June 30, 2025; Comment Period Expires July 30, 2025

Dear Mr. Morse,

The Louisiana Wildlife Federation (LWF) is a statewide, nonprofit organization that represents 23 affiliate organizations and more than 11,000 members dedicated to the conservation of Louisiana's wildlife and natural resources.

Regarding the above referenced application MVN-2011-03218-EDM, LWF is requesting that a full Environmental Impact Statement (EIS) be conducted on the proposed project and that an extension of the public comment period be granted due to the complex nature of the proposal.

Since learning in 2022 about the proposed Air Products Blue Energy LLC that would include carbon capture, utilization, and storage (CCUS) in Lake Maurepas, LWF has been deeply concerned about negative impacts to swamp and estuarine habitat from project activities in the area. This includes digging new wells and installing miles of new pipeline. We do not support a project of this kind in an estuarine system and are concerned that adequate mitigation of damage to this ecology cannot be guaranteed.

Lake Maurepas is an estuarine system that receives freshwater from the Blind River, Amite River, Tickfaw River and Natalbany River and is connected to Lake Pontchartrain, which is connected to the Gulf. The Maurepas estuary is home to bass, crappie, catfish, and bream, as well as resident birds, including wood ducks, black-bellied whistling ducks, egrets, and herons. The proposed project area contains over 40 miles of shoreline, lined with cypress trees and native vegetation. The adjacent Maurepas Swamp Wildlife Management Area (WMA) is home to bald eagles and osprey and numerous species of neotropical migrant birds who use this coastal forest habitat during fall and spring migrations. Lake Maurepas is an ecologically important estuarine system supporting the life cycle of several important estuary-dependent species including fish, shrimp and crab, which is vitally important to wildlife and people.

An EIS would evaluate impact from activities of installing wells and pipelines that would disrupt wildlife and fish habitat, require dredging of the lake's water bottoms for deepening transport channels, and laying new pipelines over potentially contaminated sediments.

LWF asserts that digging wells and installing pipelines is damaging to swamp habitat and estuarine water bottoms and this type of impact should compel an EIS. The concern is not limited to any permanent changes to critical habitat but also for the disturbance of toxic sediments, including arsenic, mercury, and VOCs like benzene, which have been identified in the lake bottom. Dredging and trenching pose a serious threat to the release of these known toxins into the waters of Lake Maurepas. These toxins have been confirmed in studies by Southeastern Louisiana University.

LWF requests an EIS to address potential impacts to aquifers and identify faults in the geological formations below Lake Maurepas that may create long-term problems.

Since preliminary project work has begun using dynamite for seismic testing and subsequently installing Class V wells, local residents have observed numerous fish kills, specifically bottom feeding catfish, and non-seasonal algae blooms, along with crab deformation being reported. Whether or not project activities are a cause, this should warrant an EIS because the full project includes activities that disturb habitat including seismic surveys, injection wells, pipelines, and barges that could lead to adverse wildlife outcomes.

The public has not had adequate opportunities for a comprehensive hearing on this project to inquire about or request an EIS. Due to the permitting process and the public's lack of familiarity with this type of CCUS project, it has been difficult to understand the full scope of the project, its activities, or the process of environmental assessment. LWF is concerned that the "piecemeal" process in which this project has been permitted is violating the National Environmental Protection Act (NEPA).

Residents in the area are concerned about carbon dioxide leakage from either the Class VI wells or the pipelines transporting carbon dioxide. These activities will be conducted in an area that is primarily public property, including state-owned water bottoms in Lake Maurepas and the Maurepas Swamp WMA, located in Livingston and Tangipahoa Parishes. Consistent recreational use for fishing, boating, paddling, swimming, and hunting could bring people into contact with the numerous wells and pipelines.

LWF acknowledges that CCUS, and the expansion of blue hydrogen production for the purpose of reducing carbon dioxide atmospheric emissions can advance the federal and state goals of reducing carbon emissions in the short term as the world transitions to more renewable energy production. LWF further affirms that CCUS is an effective process when properly regulated and monitored for potential adverse impacts on the public and its natural resources. However, LWF does not support a CCUS project sited in Lake Maurepas due to its unique ecologically important estuarine system for which adequate mitigation of damage cannot be guaranteed, and for which its scenic value and recreational use would be greatly diminished.

Thank you for the opportunity to comment and urge preparation of a full EIS under NEPA to evaluate long-term ecological risks.

Sincerely,



Rebecca Triche
Executive Director