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Mississippi River Commission
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Thank you for the opportunity to speak before the Mississippi River Commission today.

My name is Matt Rota, Senior Policy Director for Healthy Gulf. Our purpose is to collaborate with and serve communities who love the Gulf of Mexico by providing research, communications, and coalition-building tools needed to reverse the long pattern of over exploitation of the Gulf's natural resources.

A healthy Mississippi River ecosystem is valuable to the nation.

Comments and presentations during the Mississippi River Commission meetings are dominated by navigation and flood control interests. Any comments that focus on ecosystem health are critically useful. It is important to convey that environmental issues matter to residents along the Mississippi River. The Mississippi River needs to be managed to mitigate and restore ecological function.

Exxon Low Carbon carbon dioxide pipeline in St. James Parish should not be permitted under a nationwide permit, and moved to not threaten communities.

The Exxon Low Carbon carbon dioxide pipeline (408-MVN-2024-0032) is proposed to stretch from the Westbank to the Eastbank of the Mississippi River. This 24-inch pipeline would carry carbon dioxide in a super critical form, which would be at an extremely high pressure. We don't have any other pipelines that are at that pressure.

We have been told that this will probably be permitted under [Nationwide permit 58](#), which encompasses Utility Line Activities for Water and Other Substances under a half-acre water or wetland impact. This pipeline should not be covered under this nationwide for at least two reasons:

1. A portion of the pipeline would have to be directionally drilled under the Mississippi River. Pipelines that have the potential to impact the Mississippi River and Tributaries system should go through a regular permitting process that allows for public comment and scrutiny
2. Nationwide permit 58 defines "utility line" as any pipe or pipeline for the transportation of any gaseous, liquid, liquescent, or slurry substance, for any purpose that is not oil, natural gas, or petrochemicals.

However, the carbon dioxide in this pipeline would not be any of those things, as it would be compressed as a super critical fluid, which is neither gas or liquid.

Further as we saw from the [Satartia carbon dioxide disaster](#) in 2020, carbon dioxide threatened the lives of 200 people; forty-five were hospitalized. That pipeline rupture was approximately two miles from Satartia. The Exxon Low Carbon pipeline is proposed to be as close as 150 feet from businesses (see Figure 1)! The Corps should require that this pipeline be at least 2000 feet from homes, businesses, and community resources. This would give folks at least a chance to run away from a rupture.

We request that the Exxon Low Carbon pipeline permit be publicly noticed and go through the regular permitting process, not through a nationwide permit.

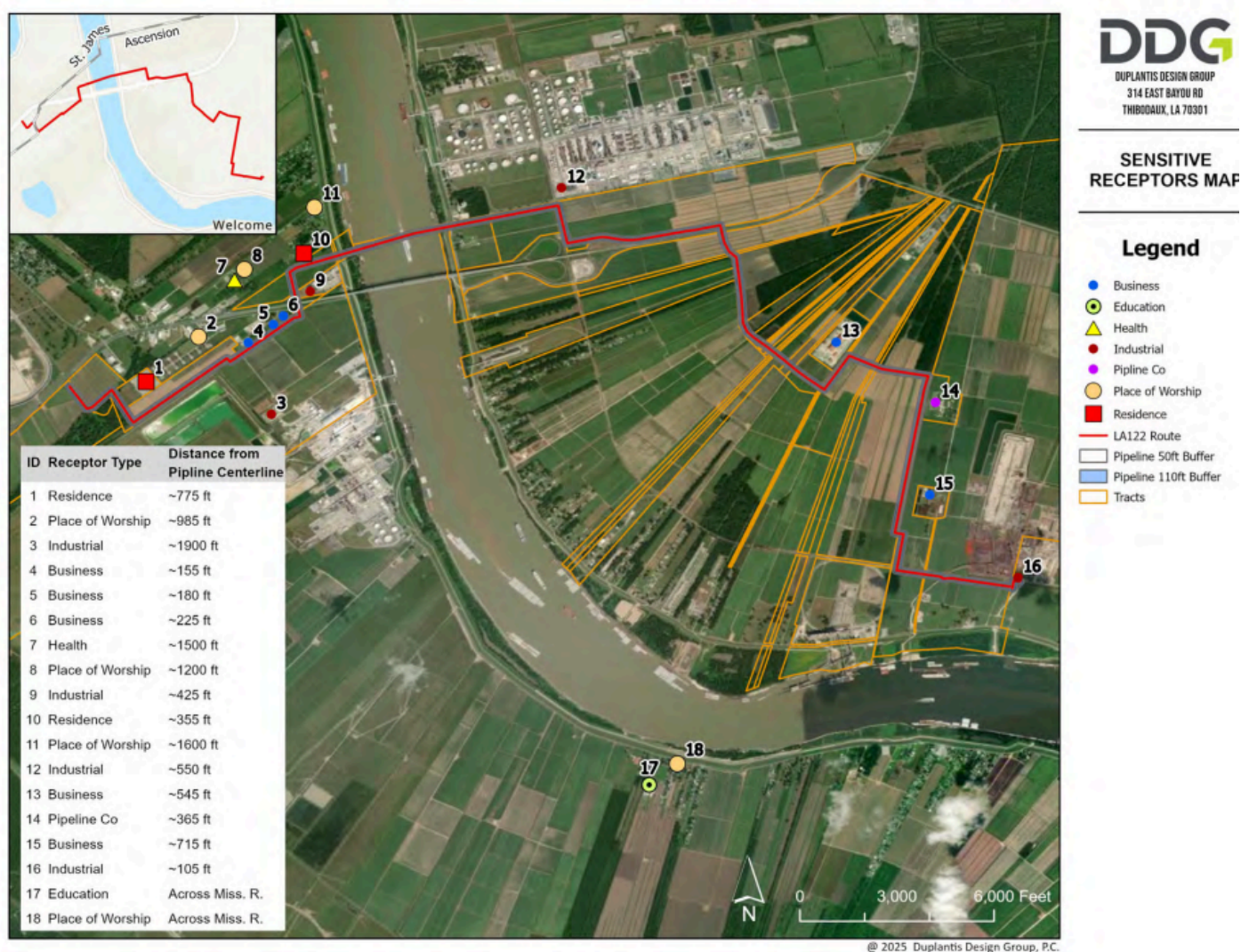


Figure 1. Community and industrial infrastructure within 2000 feet of the proposed Exxon Low Carbon carbon dioxide pipeline

Similarly the River Parishes Sequestration carbon dioxide pipeline in Ascension and Assumption Parishes should not be permitted under a nationwide permit, and moved to not threaten communities.

For similar reasons, the River Parishes Sequestration carbon dioxide pipeline (MVN-2023-0510) should not be approved under a nationwide permit. It is of the same size and contents.

This pipeline should have at least a 2000 foot buffer separating it from residences, businesses, and community resources.

We request that the River Parishes pipeline permit be publicly noticed and go through the regular permitting process, not through a nationwide permit.

A Programmatic Environmental Impact Statement is needed for proposed carbon capture and storage projects in South Louisiana

We urge the U.S. Army Corps of Engineers (USACE) New Orleans District to initiate a Programmatic Environmental Impact Statement (PEIS) before issuing any further permits for carbon capture and sequestration (CCS) infrastructure in the Barataria and Pontchartrain Basins. Healthy Gulf and our partners have deep ties to impacted communities and a long history of commenting on Corps permitting actions in this region we are deeply concerned about the cumulative environmental, public safety, and social justice implications of the proposed CCS buildout. A PEIS is both legally warranted and practically necessary to ensure these overlapping and large-scale projects are not evaluated in isolation, but rather through a comprehensive and cumulative lens.

Issues that should be included in a PEIS include:

- A no-build alternative for CCS activities as a whole, not just on a facility-wide basis.
- A close examination of alternative analyses performed by individual facilities, some of which are circuitous.
- The proposed dredging sites and sand disposal plans of each project, some of which are currently overlapping.
- The cumulative potential harm to USACE projects and infrastructure from storage tanks, CO2 and hydrogen pipelines, and other potentially explosive infrastructure.
- A calculation of the cumulative wetlands impacts, including destruction of remediation areas.
- A traffic and congestion study, including impacts to evacuation routes.
- A model of the effects of increased ship and rail traffic.
- A calculation of human health risks from CO2 pipelines and wells.
- The cumulative dangers posed by wide scale power outages, as in a major hurricane event.

Drought and sea level rise threaten communities that rely on the Mississippi River for drinking water.

Access to clean freshwater is critical for human life. The Corps' management of the Mississippi River, including its channel maintenance activities at the mouth of the Mississippi River, impacts drinking water availability in

Southern Louisiana. Deepening the river for larger ships, low water levels caused by upstream drought, and sea level rise are all playing a role in the availability of freshwater for some communities.

While the berm is working for some communities, it is upstream of Port Sulphur. And rebuilding the sill annually is not a sustainable solution. The Comprehensive Study and complimentary FEMA dollars have vanished while the Plaquemines LNG facility continues to take massive amounts of water, exacerbating this issue. The Corps has a role to play in solving this problem and needs to initiate mitigation and further analysis to offset Long-Term impacts. The effects of saltwater intrusion in Plaquemines Parish from persistent drought and continued sea level rise show just how critical it is for the Army Corps to understand the full scope of their impacts.

Funding for the Lower Mississippi River Comprehensive Management Study is critical.

The cancellation of funding for the Lower Mississippi River Comprehensive Management Study delays critically important and long overdue analysis on the environmental impacts of developing the Mississippi River and floodplain, among other issues. The study was fully funded by Congress but the Administration is clawing back the appropriations. As you know, the Lower Mississippi River is managed by centuries-old project authorities that may not be ideal given modern environmental laws, changing weather patterns, and development priorities. Among the many of the issues that have been identified by the study to date, understanding how the extreme high and low water levels are impacting people and the environment is critical. These issues may be even more important to address now, as all federal agencies that work with the Army Corps or play a role in Mississippi River management face significant cuts.

Thank you for the opportunity to raise these issues to the Commission. I look forward to your reply.

Sincerely,

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