1.0 INTRODUCTION

On May 23, 2005 Creole Trail LNG, L.P., and Cheniere Creole Trail Pipeline Company filed applications with the Federal Energy Regulatory Commission (FERC or Commission) under sections 3(a) and 7(c) of the Natural Gas Act (NGA). In Docket No. CP05-360-000 and pursuant to section 3(a) of the NGA, Creole Trail LNG, L.P. seeks authorization to site, construct, and operate a liquefied natural gas (LNG) import terminal in Cameron Parish, Louisiana. Pursuant to section 7(c) of the NGA and as filed in Docket No. CP05-357-000, Cheniere Creole Trail Pipeline Company seeks a Certificate of Public Convenience and Necessity (Certificate) to construct and operate an interconnecting natural gas pipeline between existing pipeline facilities and the proposed Creole Trail LNG import terminal facility in the State of Louisiana. In Docket Nos. CP05-358-000 and CP05-359-000, Cheniere Creole Trail Pipeline Company requests blanket certificates to perform routine activities in connection with the future construction, operation, and maintenance of the proposed pipeline and to provide open access natural gas transportation services, respectively. For the purposes of this environmental impact statement (EIS), the two applicants are collectively referred to as Creole Trail. The project, including the LNG terminal and pipeline components, is collectively referred to as the Creole Trail LNG Terminal and Pipeline Project (Creole Trail Project).

The facilities proposed by Creole Trail would import, store, and vaporize LNG and distribute, on average, approximately 3.3 billion cubic feet per day (Bcfd) of natural gas to markets in the United States, with a total plant capacity of 3.8 Bcfd. To provide these services, Creole Trail requests Commission authorization to construct, install, and operate the following facilities.

An LNG import terminal under section 3(a) of the NGA consisting of:

- a ship unloading slip with two protected berths, each equipped with three liquid unloading arms and one vapor return arm;
- four LNG storage tanks, each with a usable volume of 1,006,000 barrels (160,000 cubic meters (m^3));
- twenty-one high pressure LNG sendout pumps, each with a capacity of 1,686 gallons per minute (gpm) (384 m^3 per hour);
- twenty-one high pressure submerged combustion vaporizers, each with a capacity of 183 million cubic feet per day (MMcfd);
- three boil-off gas compressors; and
- ancillary utilities, buildings, and service facilities at the LNG terminal.

Pipeline facilities under section 7(c) of the NGA consisting of:

- Segment 2: 25.3 miles of dual 42-inch-diameter natural gas pipeline;
- Segment 3: 91.5 miles of dual 42-inch-diameter natural gas pipeline;
- Hackberry Lateral: 6.8 miles of 20-inch-diameter lateral line natural gas pipeline;
- 18 meter and regulation (M&R) facilities; and

- associated pipeline facilities including pig launcher and receiver facilities, two mainline valves (MLV) on the 20-inch-diameter pipeline, and eight MLVs along each of the individual pipelines in the dual pipeline system.

We[1] prepared this EIS to assess the environmental impact associated with construction of the Creole Trail Project in Cameron, Calcasieu, Beauregard, Jefferson Davis, Allen, and Acadia Parishes, Louisiana. This document is a draft EIS that has been prepared for public review and comment. A final EIS will be prepared subsequently to respond to comments received on this draft EIS.

1.1 PROJECT PURPOSE AND NEED

Creole Trail would site, construct, and operate the proposed LNG terminal to create access to new, competitively priced LNG supplies in response to the growing demand for natural gas in southern Louisiana and throughout the United States. Creole Trail also notes that access to natural gas from diverse supplies around the world would enhance the reliability and stability of the natural gas supply. The purpose of the proposed pipeline is to connect the proposed Creole Trail LNG terminal to the existing interstate and intrastate pipeline systems, and to thereby provide access to Gulf Coast, midwest, northeast, and Atlantic markets. The Creole Trail Project would provide service to shippers desiring to contract for the receipt, storage, and vaporization of LNG and the delivery of natural gas to the points of interconnection along the proposed pipeline routes.

Creole Trail cited the U.S. Department of Energy (DOE), Energy Information Administration (EIA) reports, testimony provided before Congress by Federal Reserve Chairman Alan Greenspan, and government and industry studies to demonstrate an increasing demand for natural gas and a need for additional supplies of natural gas. In its *Annual Energy Outlook 2005*, the EIA projects that natural gas consumption in the United States will grow from 22 trillion cubic feet in 2003 to almost 31 trillion cubic feet in 2025, which represents an annual growth rate of 1.5 percent. About 75 percent of the projected growth in natural gas demand during this period is expected to result from increasing use for electricity generation and industrial applications. In the West South Central region (which includes Louisiana, Texas, Arkansas, and Oklahoma), natural gas consumption is projected to increase from 5.2 trillion cubic feet in 2003 to about 7.0 trillion cubic feet in 2025, an annualized increase of about 1.3 percent. The EIA report notes that 40 percent of the growth in natural gas demand between 1986 and 2000 was met by imports, predominantly from Canada, but that it is unlikely that future production from Canada will be able to support a continued increase in United States imports.

Increased imports of LNG (as well as anticipated supplies from Alaska) are expected to play an important role in meeting the projected shortfalls in natural gas supplies as demand increases (EIA, 2005). Further, LNG marine transportation is recognized as a viable way of accessing "stranded" natural gas reserves in production areas throughout the world that are inaccessible by conventional pipelines, thereby increasing the availability of existing worldwide supplies to the United States.

A 2004 study prepared by the Louisiana State University (LSU) Center for Energy Studies for the Louisiana Department of Economic Development and Greater New Orleans, Inc. supported construction of LNG terminals in Louisiana (LSU, 2004). The study described the importance of natural gas usage and the impacts of high natural gas prices on the Louisiana economy, noting that Louisiana is the third largest consumer of natural gas in the United States and the second largest industrial user, primarily for the petrochemical industry.

[1] "We," "us," and "our" refer to the environmental staff of the FERC's Office of Energy Projects.

1.2 PURPOSE AND SCOPE OF THIS STATEMENT

The FERC is the federal agency responsible for authorizing applications to construct and operate LNG import and associated pipeline facilities. As such, the FERC is the lead federal agency for the preparation of this EIS in compliance with the requirements of the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40, Code of Federal Regulations (CFR) 1500-1508) and the FERC's regulations implementing NEPA (18 CFR 380). The FERC will use the results of the EIS as an element in its review of Creole Trail's applications to determine whether to authorize the project. The FERC will consider the environmental issues, including our recommended mitigation measures, as well as non-environmental issues. Final authorization would be granted only if the FERC finds that the proposed project is in the public interest. The environmental impact assessment and mitigation development described herein are important factors in this final determination.

The U.S. Fish and Wildlife Service (FWS), U.S. Army Corps of Engineers (COE), U.S. Coast Guard (Coast Guard), and U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries) are cooperating agencies for this project. A cooperating federal agency has jurisdiction by law or special expertise with respect to environmental impacts involved with the proposal and is involved in the NEPA analysis. The Louisiana Department of Wildlife and Fisheries (LADWF) has also assisted us in the preparation of this EIS.

Our principal purposes in preparing this EIS are to:

- identify and assess potential impacts on the human environment that would result from the implementation of the proposed actions;
- describe and assess reasonable alternatives to the proposed actions that would avoid or minimize adverse effects on the human environment;
- identify and recommend specific mitigation measures to minimize environmental impacts; and
- facilitate public involvement in identifying the significant environmental impacts.

Our analysis in this EIS focuses on the facilities that would be under the FERC's jurisdiction (i.e., the LNG import terminal, approximately 116.8 miles of dual sendout pipelines, and 6.8 miles of single lateral pipeline). Because it would be integral to the proposed project, the EIS will also consider a nonjurisdictional water line required to provide potable and utility water service to the site.

The topics addressed in this EIS include geology; soils and sediments; water resources; wetlands; upland vegetation; wildlife; aquatic resources; essential fish habitat (EFH); threatened, endangered, and special-status species; land use, recreation, and visual resources; socioeconomics; cultural resources; air quality and noise; reliability and safety; cumulative effects; and alternatives. The EIS describes the affected environment as it currently exists, discusses the environmental consequences of the proposed project, and compares the project's potential impact to that of alternatives. The EIS also presents our conclusions and recommended mitigation measures.

1.3 PERMITS, APPROVALS, AND REGULATORY REQUIREMENTS

As the lead federal agency for the Creole Trail Project, the FERC is required to comply with section 7 of the Endangered Species Act (ESA), the Magnuson-Stevens Fishery Conservation and

Management Act (MSA), section 106 of the National Historic Preservation Act (NHPA), and section 307 of the Coastal Zone Management Act of 1972 (CZMA). Each of these statutes has been taken into account in the preparation of this document.

Section 7 of the ESA, as amended, states that any project authorized, funded, or conducted by any federal agency (e.g., FERC) should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical..." (16 United States Code (USC) § 1536(a)(2)(1988)). The FERC, or the applicant as a non-federal party, is required to consult with the FWS and NOAA Fisheries to determine whether any federally listed or proposed endangered or threatened species or their designated critical habitat occur in the vicinity of the proposed project. If, upon review of existing data or data provided by the applicant, the FERC determines that these species or habitats may be affected by the proposed project, the FERC is required to prepare a biological assessment to identify the nature and extent of adverse impact, and to recommend measures that would avoid the habitat and/or species, or would reduce potential impact to acceptable levels. If, however, the FERC determines that no federally listed or proposed endangered or threatened species or their designated critical habitat would be affected by the proposed project, no further action is necessary under the ESA. See section 4.7.1 of this EIS for the status of this review.

The MSA, as amended by the Sustainable Fisheries Act of 1996 (Public Law 104-267), established procedures designed to identify, conserve, and enhance EFH for those species regulated under a federal fisheries management plan. The MSA requires federal agencies to consult with NOAA Fisheries on all actions or proposed actions authorized, funded, or undertaken by the agency that may adversely affect EFH (MSA §305(b)(2)). Although absolute criteria have not been established for conducting EFH consultations, NOAA Fisheries recommends consolidated EFH consultations with interagency coordination procedures required by other statutes, such as NEPA, the Fish and Wildlife Coordination Act, or the ESA in order to reduce duplication and improve efficiency (50 CFR 600.920(f)). As part of the consultation process, the FERC has prepared an EFH Assessment included in section 4.6.3 of this EIS.

Section 106 of the NHPA requires the FERC to take into account the effects of its undertakings on properties listed on or eligible for listing on the National Register of Historic Places (NRHP), including prehistoric or historic sites, districts, buildings, structures, objects, or properties of traditional religious or cultural importance, and to afford the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on the undertaking. The FERC has requested that Creole Trail, as a non-federal party, assist in meeting the FERC's obligation under section 106 by preparing the necessary information and analyses as required by the ACHP procedures in 36 CFR 800. See section 4.10 of this EIS for the status of this review.

The CZMA calls for the "effective management, beneficial use, protection, and development" of the nation's coastal zone and promotes active state involvement in achieving those goals. As a means to reach those goals, the CZMA requires participating states to develop management programs that demonstrate how these states will meet their obligations and responsibilities in managing their coastal areas. In the state of Louisiana, the Department of Natural Resources (LADNR) is the agency responsible for administering the Coastal Zone Management Program (CZMP). Because section 307 of the CZMA requires federal agency activities to be consistent to the maximum extent practicable within the enforceable policies of a management program, the FERC has requested that Creole Trail seek a determination of consistency with Louisiana's CZMP. See section 4.8.6 of this EIS for additional discussion of Louisiana's CZMP.

The Coast Guard exercises regulatory authority over LNG facilities that affect the safety and security of port areas under navigable waterways under Executive Order 10173, the Magnuson Act (50

USC §191), the Ports and Waterways Safety Act of 1972, as amended (33 USC §1221, et seq.), and the Maritimes Transportation Security Act of 2002 (46 USC § 701). The Coast Guard is responsible for matters related to navigation safety, vessel engineering and safety standards, and all matters pertaining to the safety of facilities or equipment located in or adjacent to navigable waters up to the last valve immediately before the receiving tanks. The Coast Guard also has authority for LNG facility security plan review, approval, and compliance verification as provided in Title 33 CFR Part 105, and siting as it pertains to the management of vessel traffic in and around the LNG facility.

As required by its regulations, the Coast Guard is responsible for issuing a Letter of Recommendation (LOR) as to the suitability of the waterway for LNG marine traffic. The process of preparing the LOR begins when an applicant submits a Letter of Intent (LOI) to the local Captain of the Port.

On June 14, 2005, the Coast Guard issued a *Navigation and Vessel Inspection Circular – Guidance on Assessing the Suitability of a Waterway for Liquefied Natural Gas (LNG) Marine Traffic* (NVIC 05-05). The purpose of NVIC 05-05 is to provide Coast Guard Captains of the Port/Federal Maritime Security Coordinators, members of the LNG industry, and port stakeholders with guidance on assessing the suitability of a waterway for LNG marine traffic that takes into account conventional navigation safety/waterway management issues contemplated by the existing LOI/LOR process, but in addition, will also take completely into account maritime security implications.

The Coast Guard has elected to act as a cooperating agency in the preparation of this EIS and to assist the FERC with preparation of the maritime safety and security sections (see sections 4.12.5 and 4.12.6). The Coast Guard plans to adopt the EIS if it adequately covers the impacts associated with issuance of the LOR.

At the federal level, required permits and approval authority outside of the FERC's jurisdiction include compliance with the Clean Water Act (CWA), the Rivers and Harbors Act, the Clean Air Act (CAA), and Coast Guard regulations relating to LNG waterfront facilities. Major permits, approvals, and consultations required for the Creole Trail Project are identified in table 1.3-1. The FERC encourages cooperation between applicants and state and local authorities, but this does not mean that state and local agencies, through application of state and local laws, may prohibit or unreasonably delay the construction or operation of facilities approved by the FERC. Any state or local permits issued with respect to jurisdictional facilities must be consistent with the conditions of any authorization the FERC may issue.[2]

1.4 PUBLIC REVIEW AND COMMENT

On January 26, 2005, Creole Trail filed a request with the FERC to implement the Commission's Pre-Filing Process for the Creole Trail Project. No formal application had been filed with the FERC at that time. On March 18, 2005, the FERC granted Creole Trail's request and established a pre-filing docket number (PF05-08-000) to place information filed by Creole Trail and related documents issued by the FERC into the public record. The purpose of the Pre-Filing process is to encourage the early involvement of interested stakeholders, facilitate interagency cooperation, and identify and resolve issues before an application is filed with the FERC. On March 29, 2005, Creole Trail filed a letter describing modifications to the proposed Creole Trail pipeline system, including the addition of a pipeline segment (referred to initially as the "Western Leg" and later referred to as "Segment 1") that would connect the originally proposed pipeline with the Sabine Pass LNG, L.P. Terminal, and the Hackberry Lateral pipeline segment.

[2] See, e.g., Schneidewind v. ANR Pipeline Co., 485 U.S. 293 (1988); National Fuel Gas Supply v. Public Service Commission. 894 F.2d 571 (2d Cir. 1990); and Iroquois Gas Transmission System, L.P., et al., 52 FERC ¶ 61,091 (1990) and 59 FERC ¶ 61,094 (1992).

TABLE 1.3-1

Major Permits, Approvals, and Consultations for the Creole Trail Project

Agency	Permit/Approval/Consultations
FEDERAL	
Federal Energy Regulatory Commission	Natural Gas Act (NGA), section 3 Authorization (LNG Terminal)
	NGA section 7(c), Certificate of Public Convenience and Necessity (Pipelines)
Advisory Council on Historic Preservation	NHPA 106, Comment on the project and its effect on historic properties
U.S. Army Corps of Engineers (COE)	Section 10, Rivers and Harbors Act Permit
	Authorization to discharge dredged or fill material into waters of the U.S. under section 404, Clean Water Act (CWA)
U.S. Department of Agriculture Natural Resources Conservation Service	Prime Farmland, Hydric Soil/Soil Erosion and Sedimentation, Seed Mixture and CRP Lands Consultation
	Coastal Wetlands Planning, Protection, and Restoration Act Consultation
U.S. Department of Commerce, National Oceanic and Atmospheric Administration National Marine Fisheries Service	Section 7, Endangered Species Act (ESA) consultation
	Magnuson-Stevens Fishery Conservation and Management Act, Essential Fish Habitat consultation
	Marine Mammal Protection Act consultation
U.S. Department of the Interior U.S. Fish and Wildlife Service	Section 7, ESA consultation
	Migratory Bird Treaty Act consultation
	Fish and Wildlife Coordination Act
U.S. Environmental Protection Agency	Clean Air Act (CAA), sections 171-192, New Source Review
U.S. Department of Homeland Security U.S. Coast Guard	33 CFR 127, Waterfront Facilities Handling Liquefied Natural Gas and Liquefied Hazardous Gas, Letter of Intent
STATE	
Louisiana Department of Environmental Quality	CWA, section 401, Water Quality Certification
	Louisiana Pollutant Discharge Elimination System (LAPDES) • Construction and industrial (operation) stormwater discharge permits • Hydrostatic test water discharge permits • Industrial wastewater discharge permits
	CAA, Part 70 Air Permit
Texas Commission on Environmental Quality	CAA, Air permitting review and comment (because project is within 50 miles of the Texas/Louisiana border)
Louisiana Department of Natural Resources Coastal Management Division	CZMA, Coastal Use Permit (CZMP consistency determination)
Louisiana Department of Wildlife and Fisheries	State-listed threatened and endangered species consultations
	State Scenic Rivers
Louisiana Department of Culture, Recreation, and Tourism, Office of cultural Development Division of Archaeology	Section 106, National Historic Preservation Act, Review and comment on undertakings potentially affecting cultural resources
Louisiana Department of Transportation	Road crossing permits
LOCAL	
Cameron Parish Police Jury	Building permits and road crossing permits
	Floodplain development permit
Calcasieu Parish Police Jury	Building permits and road crossing permits
Beauregard Parish Police Jury	Building permits and road crossing permits
Jefferson Davis Parish Police Jury	Building permits and road crossing permits
Allen Parish Police Jury	Building permits and road crossing permits
Acadia Parish Police Jury	Building permits and road crossing permits

Between February and April 2005, Creole Trail conducted public outreach activities to inform the public, resource agencies, industry, local government, and other interested parties about the proposed project and to identify public concerns. Company-sponsored outreach activities included two interagency meetings, an interagency teleconference, and meetings with special interest and stakeholder groups. Creole Trail also held six public open house meetings at various locations in the project area and presented information about the project at the FERC's public scoping meetings. Creole Trail considered public views and concerns identified during its outreach activities in the preparation of its Environmental Report.

On April 4, 2005, the FERC issued a *Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Creole Trail LNG and Pipeline Project, Request for Comments on Environmental Issues, and Notice of Public Scoping Meetings* (NOI). The NOI was sent to 924 interested parties including federal, state, and local officials; agency representatives; conservation organizations; local libraries and newspapers; residents within 0.5 mile of the proposed LNG terminal; and property owners along the proposed pipeline routes. On April 20, 2005, the FERC issued a *Notice of Site Visit*, which provided the meeting time and location for interested parties wishing to attend our inspections of the project site.

On April 25, 26, and 27, 2005, FERC conducted public scoping meetings in Eunice, Sulphur, and Cameron, Louisiana, respectively, to provide an opportunity for the general public to learn more about the proposed project and to participate in our analysis by commenting on issues to be included in the EIS. One person commented at the Eunice meeting, 3 at the Sulphur meeting, and 21 at the Cameron meeting. Transcripts of these comments are part of the public record for the Creole Trail Project. All of the commentors at the Cameron meetings spoke in support of the project, citing the potential economic benefits of the project to Louisiana and to Cameron Parish. On April 26, 2005, we conducted an aerial review of the project site by helicopter, and on April 27, 2005, we conducted a ground-based site visit, which was open to the public.

Issuance of the NOI opened the time period for receiving written comments and established a closing date of May 4, 2005, for receiving comments. We continued to receive and accept comments after the close of the comment period. Each of the written and oral statements was evaluated and divided into individual comments. Issues identified in scoping comments and through input from resource agencies are summarized in table 1.4-1. Comments included a letter from U.S. Congressman Charles Boustany, Jr. (7th District, Louisiana) in support of the project.

Creole Trail filed its FERC application on May 23, 2005. On July 1, 2005, Creole Trail filed an amendment to its application in which it withdrew Segment 1 from the proposed pipeline system and reduced the maximum capacity of the proposed pipeline system accordingly.

On July 20, 2005, the FERC issued another *Notice of Site Visit*. We conducted this site visit, which was open to the public, on July 26 and 27, 2005. Creole Trail filed a supplement to its application on August 31, 2005 in which it proposed certain pipeline route modifications, updated reports and plans, and provided additional information that had been requested by the Commission and/or other regulatory agencies.

In addition to the public notice process discussed above, we conducted additional agency consultations to identify issues that should be addressed in this EIS. These consultations included interagency meetings on April 28 and July 28, 2005. Participants at one or both meetings included the COE, NOAA Fisheries, FWS, Coast Guard, U.S. Environmental Protection Agency (EPA), Louisiana Department of Environmental Quality (LADEQ), and LADWF. Issues discussed during these meetings included the NEPA review process; federal and state review and permitting processes; route alternatives;

wetland impacts and mitigation; aquatic resources and fishing; air quality; EFH; dredge disposal sites, marine traffic, and safety and security planning processes.

TABLE 1.4-1

Issues Identified During the Public Scoping Process for the Creole Trail LNG Project

Issue	Comments	Draft EIS Section Where Comments are Addressed
General	Support for the project; opposition to the project; public need for project; public involvement in the NEPA process.	1.1, 1.2, 1.4
Alternatives	All reasonable alternative routes should be considered in the EIS; opposition to pipeline route on specific properties.	3.0
Geology and Soils	Potential impacts on aquatic or terrestrial habitat from contaminated sediments; protection of proposed facilities from flooding, hurricanes, and storm surge.	4.1.3, 4.2.1
Water Use and Quality	Potential impacts on water quality; potential erosion along shoreline and banks of ship channel; restoration of lake bottom; hydrostatic testing.	4.1.3, 4.3
Wetlands	Potential impacts on wetlands; placement of and mitigation for dredge material; post-construction wetland restoration and monitoring; impacts on coastal wetland restoration projects.	4.4
Vegetation	Pesticide use, the potential for invasion by exotic species.	4.5
Wildlife and Aquatic Resources	Potential impacts on fisheries, wildlife, nesting waterbirds; potential impacts of lighting or flare towers at the LNG terminal on migratory birds; potential impacts on essential fish habitat.	4.6.1, 4.6.2, 4.6.3
Threatened, Endangered, and Special Status Species	Potential impacts on state and federally listed threatened, endangered, and special status species.	4.7
Land Use, Recreation, and Visual Resources	Potential impacts on current land use; potential impacts on future installation of irrigation pipe in agricultural lands; concern about eminent domain.	4.8
Socioeconomics	Benefits to the local economy, including diversification, job creation, and economic growth; potential economic and environmental effects of secondary development; environmental justice; potential traffic congestion.	4.9
Air Quality and Noise	Existing and potential impacts on air quality; National Ambient Air Quality Standards; federal prevention of Significant Deterioration increments, and state air quality standards; potential impacts on Beaumont-Port Arthur non-attainment area; potential use of shell and tube vaporization technology; air quality mitigation measures.	4.11.1
Reliability and Safety	Protection of LNG ship berths from passing navigation traffic; future reliability with regard to increased ship traffic in Calcasieu Ship Channel; potential impacts of ship traffic on public safety and environment; navigation congestion in the Calcasieu Ship Channel.	4.12.5
Mitigation	A section on mitigation should be included in the EIS.	All sections and 5.2

This draft EIS was filed with the EPA. A formal notice indicating the availability of the draft EIS was published in the Federal Register, and the document has been mailed to individuals and organizations on the mailing list prepared for the project (see Appendix A). In accordance with the CEQ regulations implementing NEPA, the public has the opportunity to comment on the draft EIS in the form of written comments. We would review and use the comments to prepare the final EIS for the Creole Trail Project. All timely comment letters received on the draft EIS will be addressed in the final EIS. Recent hurricane activities have affected infrastructure in the project area. In addition, relatively few comments have been received on the Creole Trail Project to date, and comments that were received have been addressed in this draft EIS. For these reasons, no public comment meetings are planned on the draft EIS. If it is determined at a later date that public meetings are necessary, a separate notice will be issued.

1.5 NONJURISDICTIONAL FACILITIES

The Creole Trail Project would require construction of an approximately 2,400-foot-long, 10-inch-diameter nonjurisdictional water line to provide potable and utility water service to the site. The water line would be constructed from an existing water line belonging to Cameron Parish Water Works, District 10, south of the proposed LNG terminal entrance and would be routed along the east side of the terminal main entrance road. The water line would be constructed by Cameron Parish Water Works. Since the environmental review of the nonjurisdictional water line is not complete at this time, **we recommend that**:

- **Creole Trail file the comments of the Louisiana SHPO and the FWS on Cameron Parish Water Works' planned water line with the Secretary <u>prior to its construction</u>. Creole Trail should defer obtaining service from the planned water line until the comments have been filed with the Secretary.**