

Houston Audubon Society

...conservation and appreciation of birds and wildlife habitat

July 25, 2006

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Mr. Donald Silawsky
Office of Petroleum Reserves (FE-47)
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585-0301

This letter is submitted on behalf of the Houston Audubon Society, 440 Wilchester Blvd., Houston Texas 77079. Our mission is to promote the conservation and appreciation of birds and wildlife habitat. Accordingly, we share the concerns of the U.S. Fish and Wildlife Service (FWS) with regard to the Draft Environmental Impact Statement (DEIS) for the site selection for the expansion of the Strategic Petroleum Reserve in Texas. Houston Audubon concurs with the letter submitted by Stephen Spencer, Regional Environmental Officer, Department of the Interior dated July 7, 2006. We specifically agree with comments made concerning the potential habitat loss and detrimental effects on wildlife at the proposed Stratton Ridge Strategic Petroleum Reserve expansion site.

We are particularly concerned with the potential impacts to bird and wildlife habitat and the lack of adequate compensation for the losses that may occur at each Texas site location. Impacts to the Columbia Bottomlands are highly undesirable because of the Neartic-Neotropical birds that migrate through these properties. We agree with the concerns of the FWS that adequate mitigation may not have been offered to compensate for these losses.

We also share the FWS concerns about the impacts to migratory birds caused by the construction of large storage tanks, the electrical transmission lines and other tall structures. Insufficient information has been provided in the DEIS to determine the potential impacts. We agree with the recommendation that the transmission lines need to be buried to avoid bird strikes. We also agree that documented bird rookeries and colonial waterbird nesting sites must be left undisturbed, and a monitoring plan documenting this must be developed.

Additionally, compatibility with the refuges within the National Wildlife Refuge Systems must be identified and addressed.

We believe that several issues relevant to our mission are outstanding in this DEIS including a mitigation plan that compensates for the loss of coastal habitats and forested areas. We urge the DOE to work with the FWS to ensure that adequate mitigation is provided.

Sincerely,



Flo Hannah
Sanctuary Steward

