



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Mississippi Field Office 6578 Dogwood View Parkway, Suite A  
Jackson, Mississippi 39213

December 5, 2005

Mr. Donald Silawsky  
Office of Petroleum Reserves (FE-47)  
Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585-0301

Dear Mr. Silawsky:

This is in regard to your November 21, 2005, letter concerning reopening the scoping period for the preparation of an Environmental Impact Statement (EIS) for the Proposed Expansion of the Strategic Petroleum Reserve (SPR). The U.S. Department of Energy is considering sites for storage of crude oil in underground salt domes. Our October 20, 2005, letter supplied comments on a proposed site near Richton, Mississippi, during the first scoping period. A new candidate site at the Bruinsburg Salt Dome along the Mississippi River in Claiborne County, Mississippi, is proposed for the new scoping period. Our comments are submitted in accordance with the Fish and Wildlife Coordination Act (16 U.S.C. 661-667e) and the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C 1531 et seq.).

The proposed 285 acre site is located a few miles north of Port Gibson along the Mississippi River in Claiborne County. The proposed construction includes developing caverns in salt domes to provide up to 100 million barrels of crude oil storage. Also, a raw water system for leaching and oil drawdown, a brine setting and disposal system, a crude oil injection/distribution system, a fire protection system, a central control system, and multiple above-ground buildings would be constructed onsite.

Offsite construction would include a 2.5 mile raw water pipeline to the Mississippi River; raw water lift pumps on the bank of the river; 43 mile oil distribution pipeline to Capline Pipeline's Peetsville Pump Station; 105 mile oil distribution pipeline to Baton Rouge accessing refinery and marine facilities; and a 15 mile brine disposal pipeline to wells located along the Baton Rouge crude oil pipeline. In addition, 60 brine disposal wells would be constructed along the brine and crude oil pipeline right-of-way. The wells would be placed 1,000 feet apart.

Several federally listed threatened or endangered species and their habitats could be adversely impacted by the proposed construction and operation of the crude oil storage facility. Potential impacts to the following species should be considered during the environmental assessment and addressed in the EIS.

#### Adams, Claiborne, Jefferson, and Wilkins Counties

The endangered pallid sturgeon (*Scaphirhynchus albusj*) is one of the largest fish found in the Mississippi River. This bottom-dwelling fish has a distinctive flattened, shovel-shaped snout. It spawns in the main channel during late spring through early summer over substrates of rock, rubble, or gravel. This species has experienced a dramatic decline because its habitat has been modified through river channelization, construction of impoundments, and related changes in flow regimes. Operation of the raw water intake during spawning and nursery season could result in loss of larval and juvenile pallid sturgeons through entrainment and impingement.

### Claiborne and Covich Counties

The threatened Bayou darter (*Etheostoma rubrum*) is found only in Bayou Pierre and its tributaries, White Oak Creek, Foster Creek, and Turkey Creek. The darter prefers stable gravel riffles or sandstone exposures with large sized gravel or rock. Habitat loss or degradation has been a major contributor to the reduction in bayou darter numbers.

### Amite, Franklin, and Wilkinson Counties

The endangered red-cockaded woodpecker (*Picoides borealis*) excavates nesting cavities in mature pine trees (60+ years old). A mated pair of birds and all helper birds forms a clan. A cluster of cavity trees where the clan nests and roosts is called a colony. All cavity trees, active and inactive, are important to the colony and should therefore be avoided. Also, older (30+ years) pine stands within a half-mile of a colony should be considered foraging habitats and should not be disturbed.

### Claiborne County

The endangered interior least tern (*Sterna antillarum*) may potentially be found along the Mississippi River in the proposed project area. It migrates up the Mississippi River and lays its egg directly on the sandbars associated with the river. Hundreds of these birds may nest together to form a colony.

The breeding season for terns is approximately May through July. Avoidance of nesting areas during the above time would prevent adverse impacts to the species. The species can change nesting areas from year to year, so an onsite survey for the species before start of construction and operation is recommended.

### Jefferson County

The endangered fat pocketbook mussel (*Potamilus capax*) is found in the Mississippi River and associated tributaries. It is broad, rounded, and slightly angular mussel with a smooth, yellowish, and frequently clouded with brown, exterior color. Fat pocketbooks occur primarily in sand and mud substrates, although fee species has been found in fine gravel and hard clay occasionally. Water depth ranges from a few inches to several feet. The fish host for this species is primarily the freshwater chum.

### Adams, Amite, Claiborne, Covich, Franklin, Jefferson and Wilkinson Counties

The threatened Louisiana black bear (*Ursus a. luteolus*) occurs primarily in bottomland hardwoods and floodplain forests along the Mississippi River and the southern part of the state. Although the bear is capable of surviving under a range of habitat types, some necessary habitat requirements include hard mast, soft mast, escape cover, denning sites, forested corridors, and limited human access. Forest management practices, agricultural, commercial and industrial development, and highways can cause adverse impacts to bear habitat by increasing human disturbance, fragmenting forests, and removing den trees.

### Franklin County

The Natchez and Chucko stoneflies are species of interest. They occur in small streams with stable sandy bottoms and good water quality.

## Statewide

The threatened bald eagle (*Haliaeetus leucocephalus*) is the only species of "sea eagle" regularly occurring on the North American continent. The bald eagle is predominantly a winter migrant in the southeast; however, increasing occurrences of nesting have been observed. The bald eagle nests in the transitional area between forest and water. They construct their nests in dominant living pines or bald cypress trees. Eagles often use alternate nests in different years with nesting activity beginning between September and January of each year. Young are usually fledged by midsummer.

All of the above species are very sensitive to human disturbance. Therefore, before construction of onsite facilities and offsite pipeline right-of-ways, the Service recommends a qualified biologist conduct a visual survey for these species. Areas surveyed should also include ingress and egress areas, equipment storage areas, and staging areas. If any of these species or their habitats is identified, further consultation with the Service will be necessary.

In addition, proposed onsite and offsite construction activities may result in loss of wetland habitats. Wetlands support an abundant variety of wildlife species and provide energy rich foods for song birds. They also provide resting and nesting areas. Wetlands trap sediment and pesticide residues, recharge ground water, and control flooding by temporarily holding flood waters and releasing them slowly. The environmental values of wetlands are well documented and widely recognized. Presidential executive orders require that federal projects result in no net loss of wetlands. The Service mitigation policy requires that unavoidable loss of wetlands be fully mitigated inland.

If you have any questions, please contact Mr. Lloyd Inmon of this office staff at [REDACTED]

Sincerely,

Ray Aycock

Cc: Robert Seyfarth, Mississippi Department of Environmental Quality, Jackson, MS.  
Jeff Weller, USFWS, Atlanta, GA Tom Mann, Natural Science Museum, Jackson,  
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