

Draft EIS Comments: Proposed SPR Sites

I generally do not have much additional specific comment beyond the concerns which were summarized during the scoping period. Previous comments regarding the proposed expansion and new sites remain valid and should be fully covered in the final EIS. This information is vital for permit documentation.

Based on our June 29th, 2006, meeting, I offer the following points for consideration in the FEIS:

1. Clarify why the proposed new facility at Clovelly is not technically practicable. There is existing infrastructure, proximity to LOOP and appears compatible with petroleum support function and development trends in the Port Fourchon area. This alternative appears to be one of less environmentally damaging options.
2. Explain limitations regarding maximizing expansion of the all existing SPR facilities, whether technical or administrative (e.g., 250 million barrel cap).
3. Address alternative storage mechanisms (e.g., tanks).
4. All indications suggest that the Chacahoula site is a strong contender for selection. Therefore, the social, economic and environmental impacts should be specifically documented. Every opportunity to minimize impacts incurred by each aspect of the project should be incorporated into the design. As discussed previously, the swamp is a high quality persistently flooded, forested wetland system comprised of muck and mineral muck soils. It provides critical biological support, flood control, water storage, tropical storm buffer, water quality enhancement, recreation. Based on the scope of the project and regional land use trends and demographic patterns in the Morgan City, Houma and Thibodaux area, the cumulative impacts will require thorough analysis. An adequate mitigation project that functionally integrates in to the natural system, is within the watershed (HUC 08090302 - West Central Coastal Louisiana), and that fully compensates all impacted physical, chemical and biological functions, should be in the formulation process. In addition, EFH and ESA issues will likely require consultation.

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