



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Mississippi Field Office
6578 Dogwood View Parkway, Suite A
Jackson, Mississippi 39213

October 20, 2005

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

Dear Mr. Silawsky:

The U.S. Fish and Wildlife Service (Service) received your letter dated September 13, 2005, concerning the preparation of an Environmental Impact Statement (EIS) regarding the expansion of the Strategic Petroleum Reserve (SPR) per the Energy Policy Act of 2005 (EPACT), enacted on August 8, 2005. One site proposed as a storage facility is the subterranean salt domes found near Richton, Perry County, Mississippi. The Department of Energy has initiated preparation of the EIS by publication of a Notice of Intent at 70 FR 52099 on September 1, 2005. Our comments are submitted in accordance with the Fish and Wildlife Coordination Act (16 U.S.C. 661-667c) and the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

The proposed construction site is salt dome caverns found to the northwest of Richton and north of Mississippi Highway 42. The approximately 30 acre project site would function as a new oil storage area with up to 160 million barrels of storage capacity. 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 impacts would include a raw water intake in the Leaf River; pipelines for water supply; a 96-mile brine disposal pipeline and an 83-mile oil distribution pipeline to the Gulf of Mexico via Jackson County; a 118-mile oil distribution pipeline to Liberty, Mississippi; and marine oil distribution facilities at the Port of Pascagoula.

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

Forrest, George, Greene, Jackson, Lamar, Marion, Perry, and Walthall Counties

The threatened gopher tortoise (*Gopherus polyphemus*) inhabits well-drained sandy soils, especially in areas of longleaf pine. The gopher tortoise digs a burrow used as a shelter and nesting area. Groups of these tortoises dig burrows in the same location forming a colony. Gopher tortoises are attracted to the low growing vegetation normally found on utility ROWs. In addition, the threatened eastern indigo snake (*Drymarchon corais couperi*) is known to inhabit gopher tortoise burrows.

Amite, Forrest, George, Greene, Jackson, and Perry 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 form 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.

Forrest, George, Marion, and Perry Counties

The black pine snake (*Pituophis melanoleucus ssp. lodingi*), a Candidate Species, prefers uplands with well-drained sandy soils in areas of longleaf pine and hardwood tree species. Candidates are those species currently under review for possible addition to the federal listed of threatened or endangered species. All efforts should be made to avoid harm or harassment to this species.

Forrest, George, Greene, Jackson, and Perry Counties

The endangered plant Louisiana quillwort (*Isoetes louisianensis*) is a nonflowering grasslike plant that lives in water or in very wet habitats. Mature plants are six to ten inches long, mostly evergreen, with spore-bearing structures below ground.

The threatened yellow-blotched map turtle (*Graptemys flavimaculata*) is found in the Chickasawhay, Leaf, and Pascagoula Rivers. The yellow-blotched map turtle prefers river stretches with moderate currents, abundant basking sites, and sand bars. Stream modification and changes in water quality have significantly contributed to the decline of the species.

Marion County

The threatened ringed map turtle (*Graptemys oculifera*) is found in the Pearl River. It prefers river stretches with moderate currents, abundant basking sites, and sand bars for nesting. Stream modification in the Pearl River, such as flood control and urban development, has significantly contributed to the decline of the species. Also, water quality degradation has posed a serious problem for the turtle.

Forrest, George, Greene, Jackson, Perry, Pike, and Marion Counties Mississippi Sound

The threatened Gulf sturgeon (*Acipenser oxyrinchus desotoi*) is found in the Pearl, Leaf, and Pascagoula Rivers. Gulf sturgeons are primitive, anadromous fish that annually migrate from the Gulf of Mexico into freshwater streams. Subadults and adults spend eight to nine months each year in rivers. Although Gulf sturgeon activity is not well documented, the species has been found in the river as far north as the Hattiesburg metropolitan area. The decline of the Gulf sturgeon is primarily due to limited access to migration routes and historic spawning areas, habitat modification, and water quality degradation.

Forrest, George, Jackson, Jones, and Perry Counties

The pearl darter (*Percina aurora*), a Candidate Species, is found only in the Pascagoula River system. 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 pearl darter numbers. Candidates are those species currently under review for possible addition to the federal listed of threatened or endangered species. All efforts should be made to avoid harm or harassment to this species.

Amite, Forrest, George, Greene, Jackson, Lamar, Marion, Perry, Pike, and Walthall Counties

The Louisiana black bear (*Ursus a. luteolus*) is one of 16 subspecies of the American black bear. Historically, it occurred throughout southern Mississippi, all of Louisiana, and eastern Texas. Currently, there are only two known breeding bear subpopulations: the Tensas River basin and the Atchafalaya River basin. Although, there have been reported sightings along the Mississippi River corridor in Mississippi and Louisiana. While Louisiana black bear habitat consists mostly of bottomland hardwood forests, they are opportunistic omnivores and will frequent agricultural areas. Historical habitat has been reduced by 80% throughout its range. The remaining habitat has been reduced by forest fragmentation and human encroachment.

Jackson County

The endangered Brown pelican (*Pelecanus occidentalis*) nests mostly on offshore islands, but has been known to nest in onshore estuaries. Nesting areas are usually in low shrubs, trees or on the ground, and contain groups of 25-250 birds. They also congregate to feed near coastal wharves and pilings. Disturbance of nesting areas should be avoided.

The threatened Piping Plover (*Charadrius melodus*) does not nest in Mississippi but winters along the coastal beaches and barrier islands. These feeding areas have been threatened by urban development. Hence, Critical Habitat has been designated along several areas of the Mississippi Gulf Coast.

The endangered Mississippi Sandhill Crane (*Grus canadensis pulla*) is found only in a small area west of the Pascagoula River in Jackson County. Critical Habitat has been established on and adjacent to the Mississippi Sandhill Crane National Wildlife Refuge.

The endangered Alabama red-bellied turtle (*Pseudemys alabamensis*) is found in the lower Pascagoula River and its tributaries: Bluff Creek and the Escatawpa River. It is also found in Old Fort Bayou, the Tchoutacabouffa River, the Biloxi River, and the Back Bay of Biloxi. Destruction of nesting areas along river banks and feeding areas of submerged aquatic vegetation, and reduced water quality have impacted this species.

Green turtle (*Chelonia mydas*)
Kemp's ridley turtle (*Lepidochelys kempii*)
Loggerhead turtle (*Caretta caretta*)

Potential impacts to these sea turtles and their habitats are overseen by the National Marine Fisheries Service (NMFS). The Service will coordinate with NMFS during the environmental assessment phase.

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 occurring between September and January of each year. Young are usually fledged by midsummer.

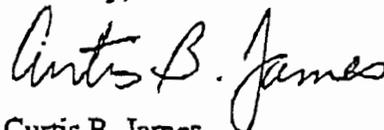
Summary

Surveys for many of the above species must be conducted on the storage facility site as well as along the pipeline routes. Areas surveyed should also include ingress and egress areas, equipment storage areas, and staging areas.

Assumption of presence can be made for many of the aquatic species eliminating the need for surveys. Presently it is our opinion that changes in water levels and flow in the Leaf, Chickasawhay, and Pearl Rivers will likely impact all of the listed species in these water bodies; therefore, further consultation with the Service will be necessary at a minimum on these species.

We appreciate the opportunity to comment on the subject project, and we look forward to being a part of the environmental process. If you have any additional questions, please feel free to contact Kathy W. Lunceford in this office, telephone: [REDACTED]

Sincerely,



Curtis B. James
Assistant Field Supervisor

Cc: USFWS, Atlanta, GA
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