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Re: Docket Nos. CP19-502-000 and PF17-8-000

2 December 2019

Dear Nathaniel J. Davis, Sr. Deputy Secretary,

We appreciate the opportunity to provide our thoughts and comments with regard to the Commission's Notice of Application, dated September 24, 2019, by Commonwealth LNG, LLC for a proposal to construct a Liquefied Natural Gas facility near the mouth of the Calcasieu River in Cameron Parish, Louisiana.

The project is deeply concerning and needs to be thoroughly vetted and assessed in terms of its economic viability and environmental impact. We request that the Federal Energy Regulatory Commission and partners host one or more public hearings on the project, with adequate notice provided to the public in advance. We urge the consideration of alternative project site locations to minimize risk, both to the facility from storms, and to the environment as a result of facility construction.

We strongly recommend that the Commission issue a Notice of Schedule for Environmental Review, resulting in an Environmental Impact Statement. This review should evaluate potential damages to natural resources, including ecosystem services and endangered species. Upon initial review, we believe the project will cause negative impacts to storm protection features in the landscape, wetland and shoreline habitats that support wildlife species of conservation concern, and ecological processes that benefit fisheries.

We are primarily concerned about the impacts to birds of conservation concern and their habitats along Calcasieu Pass. Specifically, the wetlands that would be impacted by the proposed project are irreplaceable as they almost certainly host a proposed Endangered Species, the Eastern Black Rail (*Laterallus jamaicensis jamaicensis*). Audubon Louisiana's recent research on nearby and adjacent private lands have demonstrated a direct link between the presence of this rare species and Gulf cordgrass (*Spartina spartinae*), a plant that is clearly dominant (determined via roadside surveys and via Google Earth imagery) on at least a portion of the proposed project site. Furthermore, a VHF radio-telemetry Black Rail study on adjacent land documents the dispersal of a tagged Black Rail onto the proposed project site (it was detectable by VHF signal from >100 m away). Typical wetland mitigation plans would not necessarily resolve the impacts to this imperiled bird, nor this specific type of wetland habitat; again, this is the only habitat in the region in which Black Rails can reliably be found. Again, we strongly urge the Commission to consider alternative project site locations that would not impact this habitat and the Black Rails that live within it.

As a small sample of additional issues we believe to be problematic, here are a few:

- 1) *Endangered Species*: Audubon Coastal Bird Survey and International Piping Plover Surveys have indicated that the proposed project site is used by migrating and over-wintering Piping Plovers. The proposed site is also recognized as Critical Habitat by the U.S. Fish and Wildlife Service (Unit LA-1). Calcasieu Pass is an area where this species exists in particularly high densities.
- 2) *Nesting Birds of Conservation Concern*: The beachfront is an important nesting ground to Least Terns and Wilson's Plovers (see Attachment), and the coastal marshes provide nesting habitat for Clapper Rails, Seaside Sparrows, and Black Rails, one of the rarest marshbirds in the United States. These species have been identified by the Louisiana State Wildlife Action Plan, U.S. Fish and Wildlife Birds of Conservation Concern, Audubon WatchList, and other conservation planning initiatives to require immediate conservation attention. The placement of the proposed project will have impacts to nesting birds beyond the footprint of the project itself. Nearly one miles of prime coastal nesting habitat for the aforementioned species will be severely impacted by increased activity associated with the project.
- 3) *Migratory Birds*: Coastal Cameron Parish has been shown through radar ornithology studies to support the largest volume of migrating birds in spring along the entire U.S. Gulf Coast. The variety of coastal forests, scrublands, marshes, and beaches within this project area are crucial for a suite of birds already experiencing alarming population declines. In fact, a recent study demonstrated a loss of 2.5 billion migratory birds, over 30% of the total population, since 1970. This staggering number is directly attributable to inappropriate development decisions.
- 4) *Coastal Erosion*: The proposed project site is barely protected by a rapidly eroding shoreline, putting the facility and its economic investment at unnecessary risk. Despite efforts to renourish the beach in the Cameron Parish Shoreline Renourishment project (CS-33) completed in 2014, this shoreline continues to erode rapidly. According to Louisiana's Barrier Island Comprehensive Monitoring program, this segment of beach eroded at 13.2 ft/year between 2004 and 2012, an acceleration over historical erosion estimates, which is projected to worsen as sea level rise increases. Furthermore, with three tropical storms and five hurricanes hitting southwestern Louisiana between 2000 and 2016 (about one every other year), the sustainability of this coastal facility is questionable.

In summary, we strongly oppose this project. Should the project move forward, we urge the Commission to complete a thorough Environmental Impact Statement, to be reviewed by appropriate natural resource agencies and the public. We also urge the project proponent to consider alternative project site locations. Finally, we urge any mitigation plans to include specific and direct compensation for the Eastern Black Rail, a proposed Threatened species under the Endangered Species Act. Thank you for your consideration of these comments.

Sincerely,



Karen Profita
Executive Director, Audubon Louisiana
Vice President, National Audubon Society

Attachment

Audubon nesting bird surveys in 2016 and 2017 have demonstrated that this project area would impact at least two Least Tern nesting colonies and approximately 70 nesting Wilson's Plovers (about 3% of Louisiana's nesting population in both species). These species populations are currently limited by the availability of habitat, which is under extreme threat to erosion, sea level rise, and anthropogenic modifications in Louisiana and beyond. This map shows the location of nesting birds in 2017 along the proposed project footprint. Note that Wilson's Plover territory centroids suggest nearly contiguous use of this habitat, as they require 0.1 to 0.5 miles of shoreline to successfully nest and raise their young.

