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August 24, 2015

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Re: Texas LNG Brownsville, LLC
Notice of Intent to Prepare an Environmental Impact Statement for the Texas LNG Project, Request for Comments on Environmental Issues, and Notice of Public Scoping Meetings
Docket No. PF15-14-000

Commissioners

T. Dan Friedkin
Chairman
Houston

Ralph H. Duggins
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Fort Worth

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Beeville

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Houston

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Wimberley

Lee M. Bass
Chairman-Emeritus
Fort Worth

Carter P. Smith
Executive Director

Dear Secretary Bose:

Texas Parks and Wildlife Department (TPWD) has reviewed the notice of intent, dated July 23, 2015, to prepare an environmental impact statement (EIS) for the proposed construction and operation of a liquefied natural gas (LNG) production, storage, and export facility (Texas LNG Project) by Texas LNG Brownsville LLC (Texas LNG) in Cameron County, Texas. The purpose of the project is to liquefy domestically produced natural gas, store LNG, and deliver LNG to carriers for export overseas. The project would consist of a natural gas pipeline receiving interface; natural gas pretreatment process; LNG liquefaction process; LNG loading marine terminal that includes a LNG carrier berthing dock and a materials offloading facility; LNG transfer lines; two LNG storage tanks; a vapor handling system; control systems and safety systems; and utilities, infrastructure, and support systems.

TPWD has concerns about potential impacts to fish and wildlife and their habitats from the proposed project, specifically, to environmentally critical habitats including wetlands, lomas, sand and tidal flats, coastal prairie, oysters, colonial waterbird nesting areas, submerged aquatic vegetation, and federal/state endangered species habitats. Therefore, TPWD recommends the EIS include detailed descriptions and evaluations for all associated phases of the project relative to the following:

- Potential wetland impacts and associated compensatory mitigation plans.
- Potential stream impacts and associated compensatory mitigation plans.
- Potential impacts to sand and tidal flats and associated compensatory mitigation plans.
- Potential impacts to sessile benthic organisms, including oysters, due to physical removal or disturbance and/or silting.
- Potential impacts to submerged aquatic vegetation (SAV) including seagrasses.
- Potential impacts to loma, native coastal prairie, and savannah vegetation and measures to avoid or reduce impacts.

- Potential cumulative and secondary impacts to all habitats as a result of the proposed project.
- Invasive species control plan that includes terrestrial and aquatic macrophytes as well as microorganisms associated with ballast water.
- Potential magnitude of impacts to egg, larval, and adult stages of fish, shellfish, and other aquatic organisms associated with all project design components.
- Potential for bird strikes into liquefaction facility infrastructure and into vehicular traffic on HWY 48.
- Potential impacts (physical removal of nesting habitat and disturbance from human foot traffic and machinery use) to colonial waterbird nesting areas during construction and operation of the proposed project.
- Potential impacts to all federal and state-listed rare, threatened, and endangered species and their habitats within a five-mile vicinity of the project.
- Potential impacts from sound and light pollution, with respect to fish and wildlife resources, during construction and operation of the project.
- Potential impacts associated with changes in vessel activity as a result of this and future projects (such as shoreline erosion, increased turbidity, silting, etc.).
- Potential for user conflicts and loss of access to coastal recreation and commercial fishing sites due to construction and operation of the proposed project, including changes in vessel traffic.
- Potential impact to freshwater supplies and environmental inflows.
- Potential impact to water quality from discharges associated with project construction and operations.
- Consideration of the semi-arid marine environment of this region that has a higher rate of corrosion than other areas along the Texas coast with respect to potential for unintended releases.
- Potential diminished visual aesthetic of the coastal landscape.
- Potential impacts to shallow water habitats in pristine and recently restored adjacent shallows such as Bahia Grande, Mexiquita Flats and South Bay.
- The potential for future facility expansion such as dredge and fill activities, additional right-of-way, deepening and widening of the channel, additional refrigerant units, and additional impacts to fish and wildlife habitat.
- The potential to re-suspend and redistribute contaminated sediments during construction and operation of the project.
- Dredge Material Management Plan for all phases/portions of the project and maintenance material for a minimum of 50 years including any beneficial uses of the material.
- On-site stormwater management plan.
- Provide a specific schedule for construction.
- Impacts to Boca Chica State Park, South Bay Coastal Preserve and all other lands owned or managed by TPWD.

Endangered species information should be coordinated with Russell Hooten (russell.hooten@tpwd.texas.gov or 361-825-3240) with our Wildlife Habitat Assessment Program in Corpus Christi, Texas. Access and impacts to Boca Chica State Park should be coordinated with Kendal Keyes (kendal.keyes@tpwd.texas.gov or 361-790-0326).

The Honorable Kimberly D. Bose
August 24, 2015
Page 3 of 3

Questions can be directed to Ms. Liana Lerma (liana.lerma@tpwd.texas.gov or 956-350-4491) or Mr. Willy Cupit (willy.cupit@tpwd.texas.gov or 956-350-4491) in Brownsville or Mrs. Leslie Koza (leslie.koza@tpwd.texas.gov or 361-825-2329) in Corpus Christi.

Sincerely,



Rebecca Hensley
Regional Director, Ecosystem Resources Program
Coastal Fisheries Division

RH:LK:LL:WC