



Friends of Laguna Atascosa National Wildlife Refuge LNG Position Statement

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The Friends of Laguna Atascosa National Wildlife Refuge, in keeping with our stated mission to protect, support and enhance the Laguna Atascosa National Wildlife Refuge (Refuge), stand in opposition to any construction either on the Refuge or bordering the Refuge that poses a threat to the purposes of the Refuge. In fulfillment of this mission, we stand opposed to the construction of LNG (Liquefied Natural Gas) liquefaction, storage, and export facilities on land opposite and adjacent to the Bahia Grande Unit of the Refuge. These terminals include the following: 1) the Annova LNG Brownsville Project (Docket No. PF15-15-000); 2) the Texas LNG Project (Docket No. PF15-14-000); and 3) the Rio Grande LNG Project and Rio Bravo Pipeline Project (Docket No. PF15-20-000).

We are aligned with the U.S. Fish and Wildlife Service (USFWS) in its letters of concern to the Federal Energy Regulatory Commission (FERC) regarding proposals by Annova LNG, Texas LNG, and Rio Grande LNG, to build LNG processing and export facilities on a total of approximately 2,000 acres of land neighboring the Refuge and formerly leased by USFWS to protect fragile coastal ecosystems and the habitats of several endangered species.

Potential impacts to the Refuge include:

1. Loss of critical wetland and rare loma habitat, which is important for a number of species, including the endangered ocelot;
2. Water quality degradation at the Bahia Grande Restoration Site due to accidental natural gas leaks, spills, and accidents at the LNG facilities;
3. Degradation of the view shed for users of the Bahia Grande Unit of the Refuge;
4. Disruption of prescribed fire management on the Refuge, which is important for maintaining habitat for the endangered Northern Aplomado Falcon;
5. Air, light, and sound pollution, which have the potential to threaten wildlife, particularly nocturnal wildlife.

The proposed LNG facilities are surrounded by preserved lands, including the Laguna Atascosa National Wildlife Refuge (NWR) Bahia Grande Unit, the Lower Rio Grande Valley NWR, and the South Bay Texas Coastal Preserve. These preserved lands protect some of the largest natural habitat left in the Lower Rio Grande Valley and are home to numerous species, many of which are endangered, threatened, or special status species. The habitats found within these preserved lands are considered one of the most biologically diverse regions in North America¹. At the Refuge alone, there are 417 species of birds, 45 species of

The Friends is a 501(3)c non-profit organization whose mission it is to protect, support and enhance the Laguna Atascosa National Wildlife Refuge

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mammals, 44 species of reptiles, 130 types of butterflies, and 450 plant species². Eight federally listed endangered or threatened animal species and 23 state listed species can be found at the Refuge. These include animals such as the ocelot, Northern Aplomado Falcon, Texas horned lizard, Texas tortoise, and Kemp's ridley sea turtle³. This refuge has more recorded species of birds than any other refuge in the National Wildlife Refuge System and is home to one of the two remaining ocelot populations in the United States¹.

Even areas within the proposed lease areas for these facilities are considered valuable habitat. For example, the site where Annova LNG is proposed to be located was formerly the Loma de Potrero Cercado and Loma del Divisadero preserves, which were leased by the US Fish and Wildlife Service (USFWS) from the Brownsville Navigation District for 40 years. Ocelots have been documented on these properties and they contain one of the last remaining ocelot corridors connecting the Laguna Madre ocelot populations with the coastal populations in Tamaulipas, Mexico. If this habitat is built upon, this remaining corridor will be severely disrupted, threatening the genetic viability of this endangered species.

These LNG facilities have the potential to substantially affect surface water and ground water resources through the accidental release of hazardous substances such as fuels, lubricants, and coolants. Even with spill prevention and response procedures in place, the proximity of these terminals to critical habitats found in the Refuge makes the impact from an accidental release more critical than in other areas of the Texas coast with similar industries. For example, Annova LNG will be located directly across the ship channel from the restoration channel leading to the Bahia Grande, which is considered one of the largest and most successful coastal wetland restoration projects in the United States. An accidental spill associated with these facilities could cause a catastrophic environmental impact to these highly sensitive areas.

The presence of preserved lands in this area create important recreational opportunities including fishing and bird watching. For example, the public regularly accesses fishing areas within the Bahia Grande Unit of the Refuge at San Martin Lake, the restoration channel and the Highway 48 boat launch. Annova LNG is proposed to be located directly across the ship channel from the restoration channel and Gulf Coast LNG is proposed to be located less than 0.5 miles from the Highway 48 boat launch. Birdwatching is also a popular activity at the Refuge, and Refuge staff and volunteers currently conduct birding tours and bike tours at the Bahia Grande Unit. Additionally, there is a proposed multi-use (hiker/biker) trail for Bahia Grande that would be close to Highway 48. The presence of three LNG facilities so close to these areas of recreation would cause a significant impact to the recreational users in the area, both through aesthetic effects and effects these terminals could have on wildlife.

The effects that these LNG facilities could have on the Laguna Atascosa National Wildlife Refuge represent potentially significant impacts that should be taken into account during the environmental review process.

1. <http://friendsoflagunaatascosanationalwildliferefuge.org/>
2. http://www.fws.gov/refuge/laguna_atascosa/wildlife_and_habitat/wildlife.html
3. <http://pubs.usgs.gov/sir/2006/5287/pdf/LagunaMadre.pdf>