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## Appendix G2. Responses to Letters Received During Draft EIS Comment Period

The questions and comments in Appendix G of the Draft Environmental Impact Statement (DEIS) were received by Coos County from 1999 through 2001 during preparation for an Environmental Assessment and may reflect responses from Coos County rather than the BLM.

Letters included in G-1 were received during the formal public comment period for the DEIS and the responses from the BLM reflect directly on the DEIS. The Project Advisors provided technical details for some responses.

### 1. Letter:

Oregon Department of Fish and Wildlife:

Response:

Thank you for your comments. They are incorporated into the final EIS. As stated in Appendix J of the DEIS, the construction of the lateral pipelines will follow the same project design criteria (PDC) as the rest of the pipeline project.

### 2. Letter:

Werner

Response:

Thank you for your comments.

### 3. Letter:

Roth

Response:

Thank you for your comments.

### 4. Letter:

Bunnell

Response:

Mr. Bunnell has raised questions in 25 separate categories. Answers to his questions in each category are as follows:

**1. Comparable Installations:** Much of the gas transmission pipeline from Klamath Falls to Medford was installed in 1995 alongside rural roads. Gas and liquid transmission lines are more commonly installed under roads in urban areas but in Coos County, there is already a fiber optic line installed alongside the road along the proposed pipeline route so the pipeline must be installed in the roadway.

**2. Residential Involvement:** There are approximately 25 homes located within 50 feet of the pipeline route and an additional 28 homes within 75 feet of the pipeline route. At least 25 of those homes are located in the “Libby” area. The rest of the homes are scattered along the rest of the pipeline route.

In the case of a “major leak”, such as a pipeline rupture, emergency response personnel will require people to remain as far away as possible from the ruptured area to prevent loss of human life.

If a fire has resulted from a “major leak”, then the heat resulting from that fire will determine for emergency responders the safe distance. If a fire has not resulted, then a safe distance will be determined by emergency responders and can range from 50 feet to several miles. The exact distance that people are kept from the leak site will usually depend on the experience of the emergency responders.

It is impossible to determine the “estimate damage perimeter” without making several assumptions. Please refer to the new Pipeline Safety and Fire Data section under Public Health and Safety in Chapter 4.

**3. Notification to Property Owners:** As required by the Coos County and Douglas County Conditional Use Permit applications, property owners affected by the proposed pipeline route have been notified.

**4. Residential Insurance:** The Project Advisors are unaware of any effect, positive or negative, that the

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pipeline installation will have on residential insurance rates.

**5. Cost Considerations:** The pipeline project is funded in part through Economic Development funds granted to Coos County by the Oregon state legislature (approximately \$24 million) and in part by money to be raised by the sale of some sort of financial instrument by Coos County (up to \$27 million). Coos County residents approved the Coos County funds in a November 1999 double majority vote.

If Highway 42 is considered to be the “original route”, then the currently proposed route should cost approximately \$15 million less than the estimated \$51 million for the Highway 42 route.

The money “saved” by choosing a route other than Highway 42 cannot really be called “savings” as normally defined because the money represents funds that were never actually raised or available for use. The difference in costs represents money that Coos County will not have to raise, thereby “saving” Coos County taxpayers the interest amount that would be paid on that additional money.

Any costs over the funds available from the state will have to be raised by Coos County, thus “nothing” happened to the plan to sell to the public “bonds” or some other sort of security.

**6. Pipeline Ownership and Liability:** Coos County will own the pipeline and maintain liability insurance on the pipeline. The pipeline construction contractor and possibly others would likely be held liable in case of property damage attributable to improper pipeline installation. Coos County and the pipeline operator will likely be held responsible in case of damage attributable to pipeline operation or maintenance and Coos County and the pipeline operator will carry liability insurance.

**7. Installation Information:** The pipeline will typically be installed somewhere in the uphill lane of the CBW Road. The pipeline will be buried with at least three feet of cover where possible.

Thermal expansion is not a design consideration or concern with buried welded steel natural gas pipelines because once buried, the pipe remains at a nearly constant temperature and does not expand or contract.

Where a “bend” is required, either a manufactured bend will be installed or the pipeline will likely be bent using a bending machine specially designed for bending high strength steel pipe.

**8. Installation Impacts on Road and Residential Access:** The project includes paving the CBW Road along the entire route of the pipeline installation. No horizontal or vertical road realignment, improvement or widening is planned.

The current plan is for costs of road paving or re-paving to be borne by the pipeline project. The county roads department will bid and manage the paving work.

**9. Installation Schedule and Access Questions:** Work will not start on the pipeline construction before the middle of June, 2002. That date, and all other questions related to project construction schedules are dependent on the issuance dates of several pending permits, including the BLM’s Record of Decision on the Environmental Impact Statement.

The County anticipates being able to provide at least a week notice to residents that may be affected by a road closure. The intent is to leave at least one access route open at all times but that may not be possible at all points on the Wagon Road.

The County plans to work with the Myrtle Point and Coquille school bus operations to schedule construction activities in such a manner to minimize the impact on school bus routes.

The County will work with State, County and local emergency response personnel to provide access at all times during construction.

The pipeline construction should have not affect on the ability of the Sumner Rural Fire Department to draft water from Wilson Creek. As previously stated, the pipeline project personnel will be working with emergency response personnel to provide access as required.

**10. Safety Valves/Vents:** In general, “block valves” are planned for the Lookingglass, Ten Mile, Dora, Fairview, and Isthmus Slough areas. As currently planned, the Lookingglass, and Fairview valves will have automatic or remote control closure devices. The Ten Mile, Dora, and Isthmus Slough valves will be manually operated.

The valves with automatic or remote control closure devices will be operated primarily with natural gas from the pipeline and nitrogen from external bottles as a backup source of gas pressure. The “computing” and “communication” portion of the valve closure devices will be connected to external power for battery charging to allow actuation of the valve in case of power failure. The valve closure devices will be attached to a telephone line but the closure device will be capable of automatically closing the valve in case of telephone line failure. Additionally, someone will be able to close a valve with “local” controls at the valve site.

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Each block valve will be equipped with pressure blow down valves, which will not have automatic devices attached. The blow downs will have to be manually opened and will only be opened if necessary to vent pressure from a section of the pipeline for repair or possibly in case of an emergency.

**11. Pipeline Capacity:** The block valves will be placed between 4 and 19 miles apart. If the pipeline is pressurized to 600 pounds per square inch (psig), then between 600 thousand standard cubic feet and 3200 thousand standard cubic feet will be contained between the valves.

Depending on the distance between block valves, if the pipeline is completely severed, then the time to bleed the pipeline to atmospheric pressure would range from 3 to 6 minutes after the block valves on either side of the rupture were closed.

**12. Landslides and Erosion:** Please refer to Appendix A of the Draft Environmental Impact Statement for the Geotechnical Engineering Report. In general, a landslide that results in dirt being deposited on top of the pipeline route will have no impact on the pipeline. A landslide that results in soil movement around the pipeline could result in a rupture. There is no record or collective memory of such an event disrupting the Wagon Road in any section planned for pipeline construction.

Road erosion is mitigated by the installation of culverts. Additional culverts will be installed during the pipeline construction as necessary. Paving the Wagon Road after construction will also help to reduce road erosion in the future.

A representative of the pipeline operator should be present anytime digging is performed near the pipeline as required by the Operations and Maintenance Plan.

**13. Weather:** Lightning will have no affect on the integrity of the pipeline. It is possible that a direct lightning strike could disable electronic equipment on the pipeline but that would be a temporary condition and all mechanical equipment would continue to function properly.

**14.-15. Geological Questions & Earthquakes:** Please refer to Appendix A of the Draft Environmental Impact Statement for the Geotechnical Engineering Report. The pipeline construction will not cross any active faults. The automatic or remote controlled block valves will help to minimize property damage that might be caused if the pipeline were ruptured in the event of an earthquake.

**16. Emergency and Fire Safety:** The County and Project Advisors have stated that Pipeline emergency response personnel will be available 24 hours each day and 7 days each week. The contract pipeline operator will control the location of personnel but it is likely that those employees will operate out of the Coos Bay/ North Bend area. Those employees will not normally respond to fires or other emergencies unless those emergencies directly affect the pipeline facilities.

Per USDOT regulations, area public emergency response personnel will be trained in issues related to the properties of natural gas and the proper response to leaks or suspected leaks. "Fire fighting" is not normally required because a fire issuing from a pipeline is not normally extinguished, but rather allowed to burn until no further natural gas is available to support combustion.

The Project Advisors state that Incident Command is normally the function of the first emergency responder on the scene. If the first emergency responder is a natural gas pipeline employee, then Incident Command is turned over to the first public emergency response person at the incident.

The responsibility for controlling a fire that results from a pipeline incident will not change from the responsibility present today. The Fire Department responding to forest fires or structure fires today will respond after the pipeline is built.

**17. Motor Vehicle Accidents:** A vehicle accident on the road over the pipeline will not damage the pipeline unless the accident causes the pipeline to be physically exposed. If a vehicle hits an aboveground portion of the pipeline, then an inspection will be performed to determine if the pipeline has been damaged and if repairs are necessary.

**18. Road Traffic:** Calculations and experience with similar pipeline operations indicate that 80-105,000 gross vehicle weight (gvw) vehicles will have no impact on the pipeline where the pipeline is buried in the roadway.

**19. Road Maintenance:** Normal road maintenance practices will not be affected by having a pipeline buried in the road. Culvert maintenance will require additional supervision by the pipeline operator and extra heavy gas pipe will be installed in the roadway over all culverts.

The County has no plans to improve the Wagon Road but if improvements are planned in the future then the present location of the pipeline will have to be considered when making those road improvements.

Future road maintenance costs will be borne by the County general budget, unless that road maintenance is

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caused by pipeline maintenance, in which case the pipeline operations budget will pay to repair the road.

**20. Property Protection:** The County will carry liability insurance to cover catastrophic losses due to an incident on the pipeline system. Shelter, animal provisions, and property protection measures will be handled in case of a pipeline incident in the same manner that the County would handle any other emergency.

**21. Pipeline Operation:** The pipeline operators will be on duty “24/7” (refer to Item #16). The pipeline will normally operate at a maximum pressure of 600 psig. There will be no human detectable noise emitted from the pipeline during normal operations, even at aboveground facilities. At an aboveground section of pipeline, it may be possible to hear natural gas moving in the pipeline if one’s ear were to be placed against the pipeline.

Pipeline operators will become aware of a problem on the pipeline either because of remote instrumentation or because of a “911” or other telephone call alerting the operators of a problem. The exact procedures that the operators will follow will be part of an Operations and Maintenance Plan which will be made available to emergency response organizations along the pipeline route.

**22. Gas Leaks:** Gas leaks are detected by odor, blowing sounds or debris along the pipeline route, or vegetation changes. Natural gas has no readily detectable odor so odorant, usually a mercaptan type that has a “skunk” odor, is added to the natural gas so that natural gas is detectable at a level of 1% gas in air. The lower explosive limit of natural gas in air is 3-5% gas in air.

Natural gas can travel through soils. Because natural gas is lighter than air, it tends to seek a path of escape to the surface. If a leak is detected or suspected in the vicinity of a residence, then “bar-hole” tests are performed in an attempt to isolate the location of the leak. If the residence is unoccupied at the time of a leak, then local emergency response personnel may need to enter a home to remove any possible source of ignition.

**23. Inspection and Testing:** The required inspection intervals are determined by regulations in 49CFR, part 192. In general, all block valves will be inspected annually and all road, stream, and bridge crossings will be inspected quarterly and atmospheric corrosion is inspected at least once every three years. Other inspections are also required by 49CFR, part 192. More frequent intervals of inspection are likely but will be determined between the County and the pipeline operator and will be detailed in an Operations and Maintenance Plan.

A “line pressure test” is performed to 150% of MAOP during construction. The pipeline is checked annually for leaks. There is no regulation or reason to require another subsequent pressure test of the system.

**24. Pipe Line Maintenance:** (For several of the questions, please refer to previous responses).

The underground portion of the pipeline will be coated with a protective coating that is expected to last for the life of the pipeline, which is in excess of 100 years. Additionally, the pipeline will be “cathodically protected” with anodes that will prevent metal loss by corrosion.

The cathodic protection system will be inspected at least once per year for proper operation. Portions of the cathodic protection system that are not operating properly at the time of inspection will be repaired or replaced. The coating on the buried pipe will only be inspected if the pipeline is exposed at any time. The surface facilities will be painted to protect them from corrosion.

**25. Legal Questions:** Legal questions of the sort raised by Mr. Bunnell should be referred to the County Commissioners and/or County Legal Counsel.

## 5. Letter:

Kenyon

Response:

The amount of insurance money required as a result of the pipeline operations will be considered part of the Operations and Maintenance budget and will be paid for by users of the pipeline.

The cost of the EIS studies is available from Coos County.

In response to the question concerning the use of excess flow valves, NW Natural provided the following response: “Northwest’s company policy requires the installation of excess flow valves on all new residential service lines (and all residential service lines replaced by the company for any reason) providing natural gas

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service to single family residential dwellings, as specified by the federal pipeline safety code 40 CFR Part 192.383. The excess flow valve is installed near the main line, and is designed to provide an additional margin of safety by interrupting the flow of gas in the unlikely event the single family residential service line is severely damaged anywhere between the main and the meter set. Northwest intends to apply the same excess flow valve installation policy to all new single-family residential services installed in Coos County.”

**6. Letter:**

Confederated Tribes

Response:

The BLM and County are committed to having a Tribal representative present or on-call during construction operations. Please refer to page 18 of Appendix B.

**7. Letter:**

Briscoe

Response:

Thank you for your comments.

**8. Letter:**

ONRC

Response:

Thank you for your comments. In response to each comment raised by your letter:

**1.** Please see the revised “no action” alternative in the Final EIS which describes in greater detail the actions that Coos County might take if the BLM selects the no action alternative on the EIS.

**2.** On page 3 (Purpose and Need) and page 5 (New Industrial Gas Users) of the DEIS, it is stated clearly that the purpose of constructing the pipeline is to encourage economic development in Coos County. A significant benefit to Coos County citizens will be the availability of natural gas for residential and commercial use (page 5 – Natural Gas Distribution System) and the potential conversion of existing industries that currently burn other fuels. Any new industry that wants to site a facility on the North Spit or anywhere else in Coos County will be required to apply for and abide by numerous permits, including those affecting air and water quality.

**3.** As shown on page 84 of the DEIS, public scoping meetings were held on numerous occasions at various locations. The risks of soil movement and damage to the pipeline were considered important and were addressed in the Geotechnical Engineering Report. The County carefully reviewed the credentials of the experts that prepared the DEIS and supports their opinions.

**4.** Appendix H addresses methods that will be used to prevent soil erosion and thus sediment migration into streams.

**5.** Mass soil movement risks are addressed on page A7 and on pages A16 and A17. Soil creep is unlikely to cause damage to the pipeline. Massive soil movement may cause damage to the pipeline, though in analogous soil movement cases in the Pacific Northwest, pipelines constructed using the latest construction techniques have not failed or been damaged.

**6.** The Geotechnical Engineering Report review and discussions with Coos County Road Department personnel did not indicate that it was likely that a debris flow would cause Wagon Road fill to be completely “wiped out”. Even if a section of Wagon Road fill were to be wiped out by a debris flow, the impacted area would be small and the pipeline can “free span” at least 30 feet of open area without harming the pipe. There is no record or collective memory of such an event disrupting the Wagon Road in any section planned for pipeline construction. Debris flow is most likely to occur near culverts, where the pipeline will be built with extra heavy pipe. Please refer to the Geotechnical Engineering Report in Appendix A.

**7.** There are no anticipated plans associated with this project to close any BLM roads in the area through which the pipeline crosses. Where the pipeline is installed in a power line corridor, existing power line access roads will be used to access and maintain the pipeline. Those are private roads over which the BLM has no jurisdiction.

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8. The Final EIS includes a table of streams and the method by which those streams will be crossed. (Refer to Appendix I of the FEIS).
  9. Mass soil movement, or a “landslide” onto the top of the pipeline will not damage the pipeline. See the response to questions #5 and #6 for additional information.
  10. It is possible that upslope timber cutting operations could cause a landslide to occur. As previously discussed, a landslide that deposits dirt onto the top of the pipeline will not damage the pipeline.
  11. Appendices E, and I include a stream-by stream analysis and the 5th field analysis.
  12. Please see the PDCs in the final EIS for a discussion of the Port-Orford-cedar.
  13. The PDCs will have no direct effect on the Coos Bay estuary. NW Natural is responsible for designing and constructing the gas distribution systems. The construction of those distribution systems will have to follow PDCs dictated by the municipalities in which those distribution systems are installed. See statements on Air Quality in Chapter 4. There is no new industrial development currently proposed for construction in Coos County but at such time as any new industrial development is proposed, either on the North Spit or at any other Coos County site, then that new development will have to be analyzed for impacts to Coos County and possibly to the Coos Bay estuary.
  14. Based on US DOT statistics for similar pipelines, the risks of the pipeline being installed in the power line corridor appear to be minimal. This issue has been discussed in numerous public meetings. Coos County will have clearance from BPA and PP&L to install and operate the pipeline in the power line corridors. BPA is currently finalizing an agreement with Coos County.
  15. In analogous Pacific Northwest pipeline incidents that resulted in fire, no more than two to three acres of trees were damaged. These incidents involved pipelines twice the size of the Coos County pipeline. Thus, the pipelines in the analogous incidents actually contained about 8 times as much natural gas capacity and there were no automatic closure valves on those pipelines. Automatic valves are part of the PDC for the Coos County pipeline, thus if a pipeline rupture occurred, the amount of gas that would escape should be much less than in the analogous incidents.
  16. An analysis of “alternate fuels” and “alternate energy processes” was not part of the DEIS scope and those items were thus not studied. All data presented by ECONorthwest and NW Natural and the Project Advisors (during public meetings) indicates that the pipeline would not be constructed if some alternate fuel were cleaner burning or more economical to use than natural gas.
  17. All Northwest Forest Plan requirements have been followed.
  18. Please see answer #3 above. In addition to the referenced meetings, notices requesting scoping comments and comments on the DEIS scoping were published in the Federal Register and in local newspapers.

## 9. Letter:

Sadler

Response:

Thank you for your comments. In response to specific areas of concern:

**Introduction:** The commenter is concerned that a particular statement would limit the scope of comments received from the public. The volume and variety of comments received during the comment period would seem to allay this concern.

The commenter has misread the statement letter by Coos County. Coos County correctly stated that the pipeline route as detailed in the DEIS was selected to minimize impacts to people and habitat. One of the benefits of the selected pipeline route will be a lower than expected cost to the Coos County taxpayers. Coos County did not select the route merely on the basis of cost.

**Summary:** Need for Action: Please see the revised Need for Action statement.

**Purpose of the Proposed Action:** Please see the revised statement.

**No Action:** Please see the revised statement.

Purpose of and Need for Action: Please see the revised “Purpose of and Need for Action” statement in the Final EIS. It is correct to state that the reason for building the pipeline is to encourage economic development. It is speculative to state that any new industrial development must occur in order for the pipeline to be built. In fact, NW Natural has stated in public meetings and documents that they do not need new industrial development in order to justify constructing their distribution systems.

It is false to assume that the only place that an industrial facility might be sited is somewhere on the Coos Bay estuary. In fact, there are numerous areas in Coos County that are zoned for industrial use, including several Tribal owned parcels of property which are not located along Coos Bay. Also, the commenter assumes that certain types of industrial facilities might be enabled by the pipeline project. Any new industrial facility constructed in Coos County will have to be permitted under Federal, State, and local regulations. Any industrial facilities mentioned in public meetings or public documents to date have been examples only of industrial facilities that might choose to consider locating in Coos County. There has been no evidence that those industries would actually have chosen to locate in Coos County if natural gas had been available. There has been no public announcement of any industry that is currently planning to locate in Coos County.

Alternatives Including the Proposed Action: Please see the revise No Action Alternative in the Final EIS.

**Affected Environment:** Coos County and BLM do not agree that most of the indirect and cumulative impacts of the pipeline will take place in the Coos Bay Estuary.

Current emissions data from the Beaver Hill municipal waste incinerator is not relevant to the pipeline project or the DEIS scope. Coos County air quality will not be harmed as a result of the pipeline project. In fact there is qualitative evidence that Coos County air quality could be improved if existing users of fuel oil and wood convert to natural gas. Please see other responses dealing with this issue and additions to Environment, Air Quality (Chapter 4).

Water quality of the Coos Bay estuary will not be negatively impacted by the pipeline project. In fact, as previously stated, water quality could be improved if sulfur dioxide and heavy metal emissions from users of fuel oil were reduced by conversion to natural gas.

The commenter implies that the Coos County cancer rate is somehow tied to the presence of past or present industries in Coos County. There is no credible evidence to that effect. There are no air or water emissions from a natural gas pipeline, which might affect a cancer rate.

Statements about the timber industry were considered when reviewing the DEIS for final revisions.

Various agencies have concluded that the pipeline project will not affect the Coos Bay estuary, thus recreational use of the Coos Bay estuary will also not be affected.

**Environmental Consequences:** Please see previous discussions concerning air quality issues. Regarding “2900 jobs, please read pages 65 and 66 of the DEIS, “Background”, where ECONorthwest discusses the statement about 2900 jobs. Additionally, ECONorthwest states that those jobs may not be present for at least 10 years after the pipeline is constructed. NW Natural does not rely upon this level of job growth in their plans for distribution systems.

See previous discussions of the Coos Bay estuary issues.

**Static & Dynamic Effects:** An analysis of the economics of gas distribution systems and the costs of conversions is not part of the scope of the DEIS and is not relevant to Coos County’s project. ECONorthwest did not include the cost of conversion in their savings estimates.

**Summary of ... Economic Effects:** There is no evidence that suggests that inflow or outflow of retirees would change if the pipeline were constructed. In fact, ECONorthwest states that the quality of life in a community for all residents improves when natural gas becomes available.

Public Health: Please see previous comments concerning the effect of the pipeline on cancer rates in Coos County.

## 10. Letter:

Brown:

Response:

1. The automatic valve closures to be installed on the pipeline would detect a massive leak within a few minutes and then would close a valve. The pipeline pressure would then bleed to atmospheric pressure in 3-6 minutes.
2. The sudden combustion of natural gas following a massive pipeline rupture might directly damage a power line transmission tower only if it was directly adjacent.
3. The most likely scenario for tower damage is for the pipeline to have a massive rupture, with resulting fire, occurring directly underneath a power line and lasting for a sustained period. The power line might then

part, with the result that the nearest towers could fail due to uneven strain on the tower structural members. It is unlikely that the initial combustion alone would significantly damage a tower or the power lines.

**4.** BPA and the County are entering into an agreement whereby BPA would be paid to have extra equipment on hand to mitigate the possible consequences of a pipeline incident that affects the electric transmission system. BPA specified a 2-day limit for outage of electric service to the South Coast.

**5.** After preparing the DEIS, project consultants found evidence of only one incident where damage occurred to a natural gas pipeline located near high voltage power lines. In 1999, a contractor dug into a 16” Endeveco natural gas pipeline, located virtually underneath TXU high voltage power lines in Texas. The resulting fire from the natural gas leak caused conductors to fail, resulting in the collapse of seventeen towers. The Endeveco pipeline was larger and the power line conductors were physically closer (15 to 30 feet versus 50 feet or more for BPA conductors) to the pipeline than any of the BPA conductors will be to the Coos County pipeline.

**6.** The project consultants are not aware of any “tests” that could be performed to provide the type of data that Mr. Brown suggests gathering.

As Mr. Brown suggests, the pipeline will be vulnerable to deliberate destructive acts or thoughtless vandalism at every place where the pipeline has aboveground facilities. The same hazards now exist for BPA towers, bridges and water facilities. The County has attempted to minimize the possibility of a major problem occurring by specifying extra heavy pipe in all of the aboveground locations. While the County does not believe that a gas fed fire at a bridge-crossing site will render a bridge unusable, it is possible that a bridge could be damaged and require repair.

The main transmission pipeline from the Roseburg area to the Coos Bay/North Bend Water Board area will be a 12.75” outside diameter pipeline, commonly referred to as a “12 inch” pipeline. The Northwest Natural filing with the PUC specified “at least a 10-inch” pipeline.

The County has always maintained that the pipeline will be built to the “urban growth boundary” of each city. The original study showed the Coos Bay delivery at Central Boulevard and US 101. Since that route and terminus is impractical, the county selected a route through Libby to the Water Board property. Any “cost difference” due to the substantial change in pipeline terminus was moot because the original Highway 42 route is impractical.

The decision to serve specific areas will be made by NW Natural. Public statements by NW Natural suggest that the terminus of the pipeline on the Water Board site will facilitate more extensive natural gas service in the Coos Bay/North Bend area than a terminus at a point further south.

**11. Letter:**

Port of Coos Bay

Response:

Thank you for your comments.

**12. Letter:**

Poppe

Response:

Thank you for your comments. Responses to your comments are as follows:

- 1.** No Action Alternative: Please see the revised No Action Alternative in the Final EIS.
- 2.** As noted in other comment responses, nobody can accurately speculate on the location of or type of future industrial facilities. These comments seem to speculate that the pipeline construction will somehow result in an increase of pollutants in and around the Coos Bay area. The EIS does not speculate on that issue but states that air quality is expected to improve as a direct result of the pipeline construction (see responses to Letter #8 and others).
- 3.** See also Appendix F for the USF&W letter of concurrence and responses to Letter #9.

**13. Letter:**

COE

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**Response:**

Recommendations are incorporated into the Final EIS.

**14. Letter:**

Bunnell

**Response:**

Mr. Bunnell has provided over 70 specific comments. Responses to those comments are as follows:

- 1. Need for Action & 2. No Action Alternative:** Wording is revised in the Final EIS.
  - 3. Table S-2:** It would be impossible to calculate the “tax cost” to taxpayers without knowing the exact cost of the project, the exact mechanism by which the County will finance their share of the project, and the exact tax situation of each County taxpayer.
  - 4. and 5. Purpose and Need:** Wording is revised in the Final EIS.
  - 6. Statutes and Regulations:** Legislative acts, such as the “Pipeline Safety and Community Protection Act of 2000” have no impact on natural gas pipelines until regulations are promulgated by the U.S. Department of Transportation Office of Pipeline Safety. No such regulations related to the Pipeline Safety and Community Protection Act of 2000 have been promulgated to date.
  - 7. Anticipated Future Pipeline Projects:** The estimated costs of pipeline laterals to Coquille, Myrtle Point, and Bandon are included in the draft EIS. The same project design criteria (PDC) and best management practices (BMP) will be used for the lateral construction. None of those laterals are expected to impact BLM lands.
  - 8. and 9. New Industrial Gas Users:** The commenter has assumed that only “heavy industries” will be potential users of natural gas. The EIS cannot address such speculation any more than this commenter or any other commenter can definitively state that “steel mills and fertilizer plants” will be the only future users of natural gas.
  - 10.-14. Alternatives ...:** Although there are “industry standards” for contaminants that may be allowed in natural gas, in practice each pipeline sets their own specific standards. Those standards allow virtually undetectable quantities of sulfides and carbon dioxide, which contribute to corrosion in the presence of water. Natural gas in the Williams pipeline is monitored by chromatographs (gas component analyzers) for the presence of contaminants. The pipeline would be shut down if necessary to rid the pipeline of the contaminants. Consequently, internal corrosion resulting from the presence of contaminants is not a problem for existing Williams customers, and is not an issue for or a concern for the Coos County pipeline.
  - 15.-16.** See answers to Letter #4
  - 17. Shortest Route:** The proposed route is indeed not the shortest route, point to point. The shortest route for the pipeline would traverse forested areas, requiring significant timber harvesting, and would traverse areas where pipeline construction would be nearly impossible.
  - 18. Criteria is Shortest?:** The current proposed pipeline route is a combination of the best constructability, least environmental impact, least impact on landowners, and construction cost factors possible.
  - 19.-20. Routes:** All of the route suggestions presented have been discussed in prior public meetings.
  - 21.-32.** Refer to answers to Letter #4 and Appendix J of the Final EIS
  - 33. Earthquake:** The Geotechnical Engineering Report disputes the notion that earthquakes are frequent or common. Nevertheless, in the event of an earthquake, there is no particular ground movement mechanism that will cause the pipeline to rupture in more than one place, if it ruptures at all. A recent earthquake near Tacoma affected much of the I-5 corridor from Canada to Portland, but no pipelines were damaged.
  - 34.** Refer to answers to Letter #4 and Appendix J of the Final EIS.
  - 35. Pipeline Repair:** The EIS is not intended to be a treatise in pipeline operations, maintenance, and repair procedures. The contract operator must formulate a detailed Operation & Maintenance Plan, including an emergency procedures plan.
  - 36. Construction Schedule:** The pipeline construction schedule is not relevant to the EIS as long as various “construction windows”, as detailed in the EIS, are followed.
  - 37. Road Blockages:** See answers to Letter #4.
  - 38.-40. Laterals:** None of the requested items are part of the scoping for this EIS.
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- 41. Paving:** Paving will improve the “quality of life” for users of the Wagon Road and inhabitants along the Wagon Road. Additionally, paving will improve drainage and reduced erosion along the Wagon Road.
- 42.-44. Wagon Road:** The pipeline project will provide funds for initial paving and repairs when pipeline maintenance is performed. Coos County will provide maintenance once the pipeline is installed.
- 45. Existing Roads:** The respective county roads departments are responsible for meeting existing standards on county roads.
- 46.-47. Road Improvements:** Please see answers to Letter #4. Questions concerning Wagon Road safety issues should be addressed to the Coos County Road Department.
- 48.-49. Wagon Road Maintenance:** Very little additional Wagon Road maintenance cost will be incurred in the future by Coos County as a result of the pipeline installation in the roadway.
- 50.-52. Distribution System Details:** The gas distribution systems are the responsibility of NW Natural.
- 53. Pipeline Potential:** The pipeline can flow 72 million cubic feet per day (mmcf) at typical Williams inlet pressure. Few pipelines operate at full capacity every day. The potential flow through the laterals is variable and based on the load on the main section of pipeline and whether any individual natural gas consumer installed compression at their facility. The pipeline capacity is several times the existing industrial, commercial and residential heat load in Coos County.
- 54. Industry Size:** There are no active proposals for any industrial development in Coos County at this time, including a possible “steel mill, fertilizer plant, or generation facility”, therefore nobody can accurately speculate on how many of any of those facilities the pipeline could support.
- 55.** Any response is entirely speculative as to which industries might come, where they might be located, and economic and environmental effects which might occur.
- 56. Highway 42:** Highway 42 is not a viable alternative route.
- 57. Alternate Route:** It is not in the scope of the EIS to review rejected routes.
- 58. Air Quality:** See comments in the Final EIS.
- 59. Water Quality:** Please see air quality comments in the Final EIS. Water quality is affected by air emissions and any new industry must be permitted.
- 60. Public Health:** Suggestions have been considered.
- 61. Socio-Economics:** Alternate routes have been considered.
- 62. Regional Gas Usage:** NW Natural will decide whether to distribute natural gas to Sumner and Fairview. Local residents can contact NW Natural and/or the Oregon Public Utilities Commission for answers to questions regarding natural gas service in Coos County.
- 63. Wagon Road Issues:** As stated in other responses, local traffic and emergency response traffic on the Wagon Road may be interrupted during construction and that close coordination with emergency response services and communication with residents will be necessary.
- When unsuitable materials are removed from the pipeline installation ditch in the Wagon Road, clean dry material will be installed in place of the unsuitable material removed from the ditch in order to achieve desired compaction results. The Geotechnical Engineering Report did not reveal the existence of any soils along the pipeline route that may be subject to liquefaction in case of an earthquake. Please refer to page A8.
- 64. Fiber Optic Cable:** The pipeline construction contractor will be responsible for any damage caused to the fiber optic cable if its operator has properly located the fiber optic cable. In general, the pipeline will be placed underneath the fiber optic cable at places where it crosses the pipeline installation path.
- 65.-67. Proposed Action Summary:** The EIS scope does not include speculation as to the effect of possible future industrial activity. Comments have been added to the EIS to deal with possible emissions reductions from existing industries.
- 68. Maintenance Costs:** The BLM is not concerned with the maintenance costs of various alternative pipeline routes.
- 69. Breakeven Analysis:** The economic aspects of the pipeline project have been discussed thoroughly in numerous public meetings.
- 70. Natural Gas Prices:** Such an analysis would have no relevance to the EIS, but if done, would show that natural gas has historically had an economic advantage over all other competitive fuels except fuel oil.
- 71.-74. Economic Benefits:** These suggestions have been considered.
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**15. Letter:**

Klamath-Siskiyou Wildlands Center

Response:

Thank you for your comments. You have raised numerous issues, including the proximity of the pipeline to the Lookingglass School. The pipeline does not cross Roseburg BLM lands but will be installed on property adjacent to the Lookingglass School. Coos County, the Winston-Dillard School District, and the Douglas County Planning Commission have all discussed the safety issues and have agreed to several mitigation features that should result in safe pipeline installation and operation. Burning trees or a tree limb from a fallen tree protruding into the ground would not harm the pipeline. Please see responses to Letter #14 and information provided in Appendix J, which also address fire and safety concerns.

- 1. Cost Considerations:** No cost cutting measures have been taken at the expense of environmental issues. In fact, ODFW has written a letter in support of the proposed route over the original Highway 42. Most of the cost “savings” have occurred as a result of construction cost differences.
- 2. Public Lands:** Survey and Manage species surveys have been conducted.
- 3. Fish Habitat:** There is no new road construction or re-construction planned for this project. Where possible, “fish friendly” culverts will be installed to replace existing culverts and Wagon Road paving after the pipeline construction will lessen sedimentation in the streams and rivers in the future.
- 4. Waterways:** Please see Chapter 4 of the EIS.
- 5. Soils:** Please see Chapter 4 of the EIS.
- 6. Noxious Weeds:** Please see Chapter 4 of the EIS.
- 7. Species Concerns:** Please see Chapters 3-5 of the EIS.
- 8. Archaeological Sites and Significant Native American Sites:** Please see Appendix B of the DEIS.

**16. Letter:**

Fairview Rural Fire Protection District

Response:

- A.1.** It is possible that if the pipeline is damaged, natural gas could be released and ignited. In general, a natural gas fire is not considered a situation requiring a hazardous material team response.
- A.2.** The letter describes the appearance of a liquid petroleum fire. Natural gas combustion does not produce any smoke. (see responses to Letters #4, #10, and #14).
- A.3.** It is possible that a pipeline rupture could result in one or more area roads being closed for a short period of time by emergency response personnel. Due to the installation of automatic or remote controlled shut-off valves on the pipeline, the duration of time for gas escaping the pipeline should be less than 10 minutes, at which time, the only remaining fire to extinguish would be that resulting from a structure fire or grass or forest fire.
- A.4.** Closing block valves is the safest and most effective method of extinguishing a pipeline fire. That is why automatic or remote control valves are included as part of the design for the pipeline block valves.
- B.1.** US DOT statistics show that “third party damage” is the most likely manner in which a new pipeline could be damaged after construction. That is why public education is mandated by the US DOT Office of Pipeline Safety (49CFR, part 192.616).
- B.2.** Nobody can guarantee that any protective devices will prevent a block valve or any other pipeline facility from being damaged by all outside sources. Gas utility experience shows that “jersey barricades” and bollards are a reasonably effective means of preventing pipeline facility damage from vehicles.
- B.3.** The comments have been considered. Block valves need to be located in a readily accessible location. The site chosen for the Fairview block valve is the best location in the Fairview area, considering all aspects of pipeline and lateral design and environmental and safety issues.

**17. Letter:**

Name Withheld by Request

Response:

Please see responses to Letter 9 regarding the issue of “2900 jobs”. As with others, this commenter has assumed that “all industry is dirty” when in fact there are numerous industrial facilities, which could site in Coos County without adding to existing pollution levels in Coos County. Also, as stated in other comment responses, the EIS cannot assume or speculate as to the possible location of any new industry in Coos County because numerous properties throughout the county are zoned for industrial use.

Coos County disagrees with this commenter’s statement of “fact” and have no evidence to the effect that the environmental assessment process involved with siting a new industry would be “myopic” and ignoring of any cumulative emissions impact.

**18. Letter:**

Oregon Department of Land Conservation and Development

Response:

Included in Chapter 4 and Appendix N of the Final EIS is a consistency statement, which addresses the Coos and Douglas County Land Use plans and the Coos Bay Estuary Management Plan.

**19. Letter:**

Oregon Department of Land Conservation and Development

Response:

Please see response to Letter #18.

**20. Letter:**

United States Environmental Protection Agency

Response:

Thank you for your comments.

**21. Letter:**

Mason

Response:

This issue was adequately addressed in public meetings.

**22. Letter:**

Coquille Elders Aquaculture Board/Barton

Response:

1. The “economic impact analysis” of a “gas distribution system” was addressed on Page 70 of the DEIS.
2. Natural gas in the interstate pipeline system that will feed the Coos Bay pipeline contains virtually unmeasurable amounts of sulfur components (see air quality statements in the Final EIS). The products of combustion of the natural gas will be primarily water and carbon dioxide, with trace amounts of nitrous oxides and unburned hydrocarbons.
3. The Coos Bay estuary will not be directly affected by the pipeline project, as proposed. NW Natural is responsible for planning the gas distribution systems, but the construction of those distribution systems will have to follow PDCs dictated by the municipalities in which those distribution systems are installed. Air and water quality in the area will be improved when residents, commercial facilities, and industries change to natural gas fuel from burning fuel oil and wood. Please see the air quality section of the Final EIS.

**23. Letter:**

Simpson

Response:

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BLM lands will be delineated in the final EIS.

The draft EIS has adequately addressed economic issues.

The issue of pipeline construction, economics, and politics has been adequately addressed in public meetings and in the DEIS.

The application from the pipeline project to the Coos County Planning Commission has no impact on the BLM or the EIS process. The actions of the planning commission have no impact on any decision the BLM will make.

On May 2, 2002, the Coos County Planning Commission denied the county's application for a Conditional Use Permit to cross certain lands zoned for farm and forest use. This application included the BLM segments in Coos County. The reason for denial was stated as the county's failure to prove that the pipeline would not "Significantly increase the risk of fire, or the cost or danger of fire suppression".

The County has extensively researched the US DOT pipeline incident statistics for the entire country, for this size and type of pipeline, and for Oregon and Washington incidents near forested lands. (See Appendix J of the Final EIS for details.) There is very little statistical chance that this pipeline will ever suffer a serious incident, and no precedent in Oregon or Washington that such an incident would cause a serious forest fire.

Coos County will appeal the action of the planning commission. The planning commission restricted the submission of pipeline safety information before the May 2 meeting, and did not allow any interpretation of or member questions about the data. The County believes it will prevail on this issue upon appeal, and does not plan to change the route or the EIS because of this decision.

**24. Letter:**

Liles

Response:

Directionally drilling the pipeline under the river on this property will not drain a water supply. The drilling fluid used during directional drilling contains additives that prevents fluid flow into or out of the drill hole. Once the pipe is installed under the river, the drill hole will close around the pipe and not allow fluid to flow along the path of the pipe installation.

See also the air quality section of the Final EIS and previous letter responses.

**25. Letter:**

Coquille Indian Tribe

Response:

The same PDCs and BMPs will be used for the laterals as is used for the main pipeline construction. These would include cultural surveys and project monitoring.

Revisions have been made to project monitoring language as suggested.

Refer to Appendix B of the draft EIS. All parties believe that joint monitoring will result in adequate identification and mitigation of archaeological and cultural sites that have not already been identified.

**26. Letter:**

Stewart

Response:

Please refer to previous responses regarding environmental assessments.

BPA has not formally announced nor rescinded their "moratorium" but Coos County and the BPA have agreed on a method by which the pipeline can be installed in the BPA corridor where necessary. No formal document has been issued by BPA to date.

**27. Letter:**

Nelson

Response:

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Thank you for your comments. Your concerns have been addressed in responses to other letters.

**28. Letter:**

Metcalf

Response:

The Geotechnical Engineering Report in Appendix A has adequately addressed the location of active faults. Based on cultural review to date, the County is not aware of the Indian grave and camping sites mentioned in this letter. Joint monitoring, by Indian tribal representatives and County inspectors is intended to insure that no cultural resources are desecrated.

**29. Letter:**

Clawson

Response:

Thank you for your comments. Please see the responses to previous letters.

**30. Letter:**

Clawson

Response:

Thank you for your comments. Please see the responses to previous letters.

**31. Letter:**

Gaab

Response:

The application submitted to the Coos County Planning Commission has no relation to this Environmental Impact Statement.

**32. Letter:**

Herne

Response:

The BLM is “involved” because a permit application was submitted to the Coos Bay BLM office and this Environmental Impact Statement is a result of that permit application.

**33. Letter:**

Doty

Response:

Please refer to previous responses regarding environmental assessments. Please refer to Chapter 4 and Appendix N of the Final EIS for consistency with state and local plans.

The issue of project economics and the participation in the pipeline project or lack thereof by Bandon has been adequately addressed in numerous public meetings.

**34. Letter:**

Joyce

Response:

The issue of route selection has been adequately addressed in numerous public meetings and in the draft EIS. Please refer to previous responses regarding environmental assessments. Refer to responses to Letter #9.

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**35. Letter:**

Hopkins

Response:

Thank you for your comments. Please see the Final EIS concerning the Port-Orford-cedar.

**36. Letter:**

Schrieber

Response:

Thank you for your comments. Your issues have been raised and answered in numerous public meetings.

**37. Letter:**

Leisy

Response:

Thank you for your comments. In response to each of the items in your letter:

1. Construction of those laterals will be required to follow the same PDCs and BMPs as the main pipeline construction.
2. ROW issues involve Civil Law legal determinations that are not relevant to the EIS.
3. COE input has been received throughout the DEIS process, even though PDC or other comments may not be specifically attributed to the COE.
4. Please see Appendix F for the USFWS concurrence letter.
5. The conclusion of the biologists involved in the preparation of the DEIS was that there will be no long term or cumulative effect to the flora and fauna in Coos County as a result of the pipeline construction and subsequent operation of the pipeline.
6. The project consultants did not locate the contradictory findings that are referenced in this comment. Directional drilling (sometimes also referred to as “boring”) will virtually eliminate the possibility of erosion around the pipeline stream crossing. The Geotechnical Engineering Report in Appendix A found no evidence of active faults or active landslides. Appendix H, as revised for the Final EIS, has adequately addressed PDCs and BMPs to be used to prevent soil erosion.
7. Aboveground pipeline facilities are mentioned and described in several places in the DEIS but specifically in Appendix J.
8. See air quality statements and responses to previous letters.

**38. Letter:**

Ryan

Response:

This commenter has assumed that negative effects will occur or be enabled as a result of the pipeline construction. Certainly, Coos County has promoted the project as a means of increasing economic development. Because there are no current economic development projects proposed, it is speculative and out of the scope of the DEIS to assume that “heavy” or “polluting” industry will want to locate in Coos County merely as a result of the presence of natural gas. In fact, NW Natural is constructing their distribution system using the assumption that no new industry will come to Coos County. Please see also answer #8 to Letter #37.

It is also speculative and out of the scope of the DEIS to attempt to address the exact location of a future industrial facility. There are numerous sites in Coos County, other than the North Spit, designated for industrial use.

The County is unaware of any evidence that “tax breaks” in “Enterprise Zones” creates budget problems for local governments and ECONorthwest did not identify any such problem.

The issue of whether new jobs would be filled by current residents or “experienced workers from outside the

area” should not be addressed by the EIS but rather by local governments when new projects are proposed. As noted in the opening paragraph of this Appendix, some of the comments in the DEIS Appendix G were those of Coos County and not necessarily of the BLM.

**39. Letter:**

Gomez

Response:

Thank you for your comments. In response to specific comments:

1. The “Purpose of and Need for Action” correctly states that there is no guarantee that if the pipeline is built then any new economic development will occur.
2. It is speculative and not in the scope of the Final EIS to assume that any specific type of industrial facility will be sited in Coos County. In fact, as stated in the EIS and in previous comment responses, the air quality of Coos County should be improved by making natural gas available to Coos County residents and businesses.
3. The parties believe that the Final EIS has adequately addressed cumulative and indirect effects to Coos Bay and the Coos Bay estuary.
4. As previously stated, it is not in the scope of the DEIS to study the causes and incidences of cancer in Coos County. It is entirely speculative to assume that the pipeline construction would have any effect on cancer rates in Coos County.