



Oregon
John A. Kitzhaber, M.D., Governor

January 29, 2002

Bob Gunther, Project Coordinator
Coos County Natural Gas Pipeline DEIS
Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

Department of Fish and Wildlife
Charleston District Office
63538 Boat Basin Drive
PO Box 3430
Charleston, OR 97420
(541) 888-5515
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Dear Mr. Gunther:

I have just completed a review of the Coos County Natural Gas Pipeline DEIS and offer the following comments:

1. The Oregon Dept. Fish & Wildlife supports the selection of the Proposed Alternative (CBW Road), as opposed to the Highway 42 Alternative Route. The Proposed Alternative minimizes impacts to fish and wildlife resources by reducing the number of stream crossings, wetland crossings, and pipeline construction within floodplain.
2. Pages 10-11: It is difficult at this time to comment on impacts from construction of the anticipated Lateral Routes and the Coos Bay-North Spit crossing, since these projects are not evaluated in the DEIS. Perennial and intermittent stream crossings of the Lateral Routes will require as much diligence in planning and design as was expended for the current DEIS.
3. Page 13: Paving of the gravel sections east of Sitkum and north of Fairview has the potential to improve water quality and thus fish/wildlife habitat in the North and East Fork Coquille subbasins. In doing so, however, consideration must be made for drainage ditches, culverts, alteration of runoff pattern, and increased difficulty of future culvert replacements. I would encourage your coordination with Coos County Highway Dept. and with the Coos and Coquille watershed associations to identify and possibly correct deficient culverts and drainage problems prior to paving.
4. Table 5, Page 25: Oregon Coast outthroat trout are widespread in the Coquille Basin. They have the potential to be encountered at nearly every fish-bearing stream to be crossed by the pipeline corridor. Otherwise, I believe you have fairly captured the major streams of concern for coho, steelhead, and chinook.
5. Page 27: Insects are also an important source of food for fish, amphibians, and mammals.
6. Page 30—Affected Environment—Recreation: just a heads-up that anglers and other fish/wildlife-oriented recreationists use the proposed route. A salmon fishery occurs in Isthmus Slough in the fall (heaviest in September and October), and construction scheduling should avoid the slough crossing at this time of year.

GAS PIPELINE DEIS COMMENTS—Page 2—January 29, 2002

7. Page 38—I concur with the "Proposed Action Effects Summation". On a larger scale (5th HUC) impacts will be minimal. Site-specific (7th HUC and higher) impacts to fish and wildlife will occur, but should be relatively short-term and minor. At a few specific sites, the project has the potential to cause long-term improvement in habitat quality and access (fish passage).
8. Appendix A-7: the geotechnical report indicates some potential for mass soil movement during the life of the project. This risk may actually be increased by construction of the pipeline via disturbance of presently stabilized soils. A commitment to periodic inspection of soil erosion and maintenance of disrupted sites should be established through the DEIS process.
9. Appendix H-2 and H-3: The second BMP "bullet" is good. The trapped sediments should be collected, disposed of in an upland site, and seeded or otherwise stabilized.
10. Appendix H-4: During the "Bag and Flame" installation, contractors must ensure that no fish become trapped in de-watered sections of the stream. Upon installation of the upstream sandbag dam, personnel must inspect pooled water below the dam for trapped fish. Such fish should be captured and released in the watered section below the flame outfall.
11. Appendix H-6: good point on wet/green cement, and asphalt. Keep in mind that for "Bag and Flame" sites, the area will not be de-watered for 21 days, so use of cement is not feasible. Heavy equipment leak inspections should be frequent. Storage and transfer of fuels should be situated well away from a waterway or ditch, and spill containment devices should be immediately on "ready" when fuel or lubricants are present.
12. Appendix J-2: Inwater blasting permits are required by ODFW. The rules for issuance of inwater blasting permits include a period of public notification, so application must be made well in advance.
13. Appendix J-5 (Pipeline bedding): where backfill will be imported road base, and excess native soil will be hauled, the County should have this upland disposal site arranged in advance, and such disposed soils should be seeded for stabilization until needed in other road operations.
14. Appendix J-11 (Pipeline patrols): such patrols should be made more frequently than annual in the first two years, since soils will be disturbed in the pipeline construction. At least one of the patrols should be done after winter-spring heavy runoff (i.e. mid- to late May) to check for soil erosion and earth movement.
15. Appendix K1-VII: White-tailed deer?

GAS PIPELINE DEIS COMMENTS—Page 3—January 29, 2002

Thank you for the opportunity to comment on the DEIS for the Natural Gas Pipeline Project. Please note that I did not review the portions of the DEIS pertaining to the Umpqua Basin. This area is within the administrative jurisdictions of Dave Loomis (District Fish Biologist) and Terry Farrell (Wildlife Biologist) out of Roseburg. You may receive additional comments from these ODFW biologists.

Sincerely,

Mike Gray

Mike Gray
District Fish Biologist
Umpqua Watershed District, Charleston Field Office

cc: Steve Denney, ODFW SW Region/Roseburg
Dave McAllister, ODFW Habitat Division/HQ
Dave Loomis, ODFW SW Region/Roseburg
Terry Farrell, ODFW SW Region/Roseburg
John Toman, ODFW Charleston



U.S. Department of the Interior
Bureau of Land Management
Coos Bay District Office
Oregon



Leave comments at the registration table or mail them to: Bureau of Land Management; Coos Bay District Office, 1300 Airport Lane, North Bend, Oregon 97459, Attn. Project Manager; Bob Gunther.

Please Read Carefully

Comments, including names and street addresses of respondents will be available for public review at the Coos Bay District Office during regular business hours (7:45 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must state this prominently at the beginning of your comments. Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be made available for public inspection in their entirety.

Name/Organization: Ed Werner
Address: 92691 Knutsen Lane
e-mail address: Coos Bay, OR

Zip Code: 97420
Telephone number: (541) 269-2159

Would you like to be included on the project mailing list? Yes No

Comments:

*Living in the country near Coos Bay, I will not benefit directly from the pipeline, but I believe that it will benefit our entire community economically so that I and everyone else will benefit indirectly as industry is attracted to our area -
I like the idea of the old wagon road route*

Signature: *Edward E. Werner*



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Name/Organization: Debra Roth
Address: 526 SW 17th Ave, Coos Bay, OR 97420
e-mail address: debra@prys.com Zip Code: 97420
Telephone number: 541-267-7547

Name/Organization: Will C. Bunnell
Address: 9881 Coos Summer Ln
City: Coos Bay, OR Zip Code: 97420
e-mail address: will@willbunnell.net Telephone number: 269 2111

Would you like to be included on the project mailing list? Yes No

Would you like to be included on the project mailing list? Yes No

Comments:

I am strongly in favor of the pipeline!
I feel that it offers our community the infrastructure it needs for economic development.

Comments: SEE ATTACHMENT PLEASE (12 PAGES)

Signature: Debra Roth

Open House Meeting for the Coos County Natural Gas Pipeline February 19, 2002

Signature: _____

Open House Meeting for the Coos County Natural Gas Pipeline February 19, 2002

02/19/02 Pipeline Questions 1/12

WILL & CONNIE BUNNELL
9881 COOS SUMMER LN.
COOS BAY, OR 97420

02/19/02 Pipeline Questions 2/12

PipeLine Questions

5 Cost Considerations

1 Comparable Installations

- What other rural roads in Oregon have pipelines installed in like manner to this proposal?
- When were these installations made?

- How is this project to be funded?
- What is the cost differential between the original route and the proposed route?
- If there is to be money saved by adopting this proposed route, how much money is involved?
- What are you going to do with this money?
- What happened to the plan to sell to the public \$20 million worth of bonds on this project?

2 Residential Involvement

- How many residences are located within 30 to 50 feet of the proposed route?
- How many residences are located within 51 to 100 feet of the proposed route?
- How many residences are located within 101 to 200 feet of the proposed route?
- How many residences are located within 201 to 500 feet of the proposed route?
- In case of a major leak, how far away must non-emergency personnel remain?
- What is the estimated damage perimeter in case of a major pipeline gas leak and fire?

6 Pipeline Ownership and Liability

- Who is to own the pipeline?
- Who is to be liable in case of damage attributable to pipeline installation?
- Who is to be liable in case of damage attributable to pipeline operation?
- Who is to be liable in case of damage attributable to pipeline maintenance?

3 Notification to Property Owners

- Has every property owner along this new route been notified that you are planning to lay this pipeline through or adjacent to his property?

7 Installation Information

- Where in the Coos Bay Wagon Road right-of-way will the line be located?
- How deep will the line be buried?
- What thermal expansion (feet/mile, for example) is anticipated?
- What expansion due to operating pressure (feet/mile, for example) will the pipeline undergo?

4 Residential Insurance

- What effect will installation of the pipeline have on residential insurance rates?

02/19/02 Pipeline Questions 3/12

- What provisions are to be made to control or compensate forces caused by expansion and contraction?
- How is the pipeline to be shaped to conform to the road, cold bent, cut/welded, flexed?
- What effect does expansion and contraction have on these shapes and construction methods?
- How will movement or drift of the line due to expansion and contraction be controlled?

8 Installation Impacts on Road and Residential Access

- Will the road be resurfaced after the pipeline is laid?
- How extensive will the road resurfacing be?
- How much of existing gravel surface will be paved as part of this project?
- Will any part of the existing CBWR be improved prior to pipeline installation?
- Will the road be widened at any place?
- Will the road be straightened (vertical, horizontal) at any place?
- Are road resurfacing costs to be charged to the pipeline project or the county?
- Who will do the work (county, contractor)?

9 Installation Schedule and Access Questions

- When is the project start date, and end date?
- What is the installation schedule, per segment of Coos Bay Wagon Road (CBWR)?

02/19/02 Pipeline Questions 5/12

11 Pipeline Capacity

- How many standard cubic feet of gas are contained in the line between safety valves?
- In case of a major leak, how long will it take to bleed the gas constrained between safety valves to atmospheric pressure?

12 Landslides and Erosion

- What procedures are to be followed in case of landslides?
- What provision is made for road erosion?
- Will a pipeline representative or overseer be present when road repairs due to landslides or erosion are being performed?

13 Weather

- How will the pipeline be protected from lightning strikes? Lightning can strike the ground, traveling great distances along buried conductors.

14 Geological Questions

- What geologic faults are crossed by this proposed route?
- What is the fault movement history?
- Which of these faults is in the vicinity of existing residences or improvements along the CBWR?

15 Earthquakes

- What is the probable movement of faults near the pipeline in case of earthquake?

02/19/02 Pipeline Questions 4/12

- What is the schedule for residential access blockage during installation?
- What is the schedule for access restrictions to businesses, farms, and logging operations, during installation?
- What is the schedule for route blockage along CBWR during installation?
- What provision will be made for school bus access along CBWR during installation?
- What provision will be made for emergency services (fire, ambulance, law enforcement) to all areas along CBWR during installation?
- What provision will be made for Summer Rural Fire Department to draft fire protection water from their designated areas on Wilson Creek?

10 Safety Valves/Vents

- Where are cutoff safety valves located?
- How are cutoff safety valves operated?
- From what locations are cutoff safety valves operated?
- Where is power to operate safety valves obtained?
- Are backups for this safety valve power to be provided?
- How are signals to safety valves to be conveyed or routed?
- What procedures are to be followed upon loss of safety valve signal capability?
- Are safety vents to be provided?
- Where are the safety vents to be located?

02/19/02 Pipeline Questions 6/12

- How will the pipe line be protected in the vicinity of these faults?
- What provisions are to be built in to protect homes and other property in the vicinity of fault lines in case of earthquake?

16 Emergency and Fire Safety

- How will pipeline operations respond to emergencies along the pipeline, such as wild land fires, MVA, storm damage and others?
- Where are pipeline emergency crews located? Are they on duty 24/7?
- How will fire fighter crews be trained how to deal with emergencies in proximity to this line?
- Who will be responsible for fire ground Incident Command?
- Who is responsible for controlling fires related to the pipeline?
- What is the role to be played by Rural Fire Protection District in fires potentially involving the pipeline?

17 Motor Vehicle Accidents

- What procedures are to be followed by pipeline project operations when there are vehicle accidents on this road?
- What procedures are to be followed if a log truck in a MVA or other vehicle in an accident catches fire?
- What procedures are to be followed by local emergency services personnel in these cases?

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February 22, 2002

Mr. Bob Gunther, Project Coordinator
Bureau of Land Management
Coos Bay District Office
1300 Airport Lane
North Bend, Oregon 97459

Re: Natural Gas Pipeline Environmental Impact Statement

Dear Mr. Gunther:

After reviewing the issue regarding the routing and the various impacts of the proposed route for the natural gas pipeline from approximately Drain, Oregon to Coos Bay, Oregon and other points, I am completely in favor of the project and its proposed route.

Yours very truly,

Joe T. Briscoe

February 25, 2002

Sue Richardson, District Manager
Coos Bay District Bureau of Land Management
1300 Airport Rd
North Bend OR 97459

Subject: ONRC comments on the natural gas pipeline

Dear BLM:

Please accept the following comments from Oregon Natural Resources Council Fund (ONRC) concerning the Coos County Natural Gas Pipeline Draft Environmental Impact Statement, dated December 2001.

1. The no action alternative (described on page vi) involves building 63 miles of pipeline at a cost of \$36.3 million. This is not "no action."
2. The DEIS is unclear whether the purpose of the natural gas is for residential use or industrial use. Will there be local distribution networks constructed? What are the impacts? If you build it, will dirty heavy industry come to the North Spit? What are the impacts.
3. The DEIS discussion of scoping is inadequate. How was public input considered during scoping? How were the issues arrived at? Why was mass soil risks and fire risks to the CHU not considered important enough to be discussed at length? All the scoping input seems to be summed up and dismissed in an appendix and the DEIS itself is just a product of the "experts" who we are just supposed to trust.
4. The 188 stream crossings are a concern for sediment production and delivery. You simply can't get a 12 inch pipe under a stream (or buried in fill over a stream) without some serious earth moving.
5. The DEIS contains only a very generalized description of mass soil movement risks. (page A-7).
6. Many of the streams crossings are in the road fill above the stream in very steep terrain that is susceptible to debris torrents. Road fill can simply be wiped out and with it the high pressure gas pipeline. The DEIS does not disclose the consequences of this.

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7. The DEIS does not adequately explain whether the route considered, follows, or avoids roads that will later need to be closed to conform to BLM road management requirements or road density limitations imposed by resource concerns such as salmon conservation.
8. The DEIS should disclose how many intermittent or other streams will be directionally drilled vs. trenched.
9. Page A-16 concludes that the risks of pipeline failure due to mass soil movement are small, but the geotech report admits that it is only a conceptual report and the report simply guesses without any analytical basis the probable sizes of slides.
10. The geotech report also admits that they lacked information to analyze the risk that landslides induced by upslope clearcutting or other forest management that might cause a pipeline failure. This is unacceptable NEPA analysis.
11. The aquatic analysis is based on only one (watershed) scale of analysis when the Northwest Forest Plan requires that all scales be considered. See the 9th Circuit opinion in PCFFA v. NMFS.
12. The DEIS fails to disclose if Port Orford Cedar root disease might be spread to new areas not currently infected.
13. The EIS must address the indirect effects of the proposed action, including stimulation of other economic activity that is clearly contemplated by this proposal. These other economic activities can have negative impacts on land use, water resources, wildlife, quality of life, etc. The DEIS does not disclose the effects of future developments such as the laterals, future industrial development of the North Spit, etc.
14. Please explain the risks of having a natural gas pipeline in the vicinity of a powerline right-of-way. Does this proposed route have clearance from the holders of the electricity rights of way?
15. Will this pipeline be inst if there is a gas leak could it cause a large fire in the spotted owl critical habitat unit? The DEIS fails to disclose this very significant risk.
16. A thorough economic analysis of alternative fuels and alternative energy processes must also be included.
17. All Northwest Forest Plan requirements, including wildlife survey

and resource protection requirements should be followed.

18. The BLM/County failed to seek out or allow public input during the scoping process.

Sincerely,

Doug Heiken
Acting Conservation Director
ONRC Fund

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PO Box 411
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Bob Gunther, Project Coordinator
Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459
March 1, 2002

SUBJECT: Comments on Draft ES -Coos County Natural Gas Pipeline
In summary, I feel the Draft ES is grossly deficient and that it does not meet the letter and intent of NEPA and applicable regulations and guidelines. Specifically, even though NEPA clearly requires a discussion of the indirect effects of a proposal and their significance (CEQ 1502.16b; CEQ 1508.8b), the Draft as written dismisses the concept of indirect environmental effects in a few short sentences, and makes no attempt at analysis whatsoever. In a similar manner, no attempt is made to address cumulative environmental impacts (CEQ1508.7) that may be associated with the proposed action. Because of these omissions, the document fails to provide evidence that the necessary environmental analyses have been made (CEQ 1500.2b) and calls to question whether subsequent decisions will be based on a full understanding of the environmental consequences (CEQ 1500.1c).
It appears questionable that the BLM interacted properly with the County early on to insure full integration of the NEPA process. The BLM had the responsibility to identify the types of information required (CEQ 1501.2d1) as well as the level of detail required to insure that environmental effects and values could be properly compared to economic and technical considerations (CEQ 1501.2b).
Additionally, the tone of the document as written is one of justification of a pre-conceived action rather than objective analysis in direct violation of CEQ 1502.2g.

My specific comments on the Draft ES are as follows:

INTRODUCTION

- 1. BLM cover letter, 1st page, 3d para: "For comments to be most helpful, they should relate to specific concern or conflicts that are within the legal responsibilities of the BLM." This is a strange statement, given the fact that CEQ Regs requires that an ES analyze alternatives outside the jurisdiction or capability of an agency if it is reasonable to do so. In fact, the instant ES does exactly that. This statement could greatly limit the scope and depth of public comments, and should be removed.
- 2. Coos County cover letter, 1st page, 1st para: The statement that the ES has "minimized impacts to people and habitat" and has reduced the estimated cost of the pipeline is wrong and completely out of place within the context of a draft ES. It puts in question the true level of understanding that the Board of Commissioners has of the entire ES process, and lends credence to the idea that this document is

development as an indirect effect of the pipeline did not deter the assigning of economic benefits. A valid ES analysis demands that the potential environmental impacts associated with the assumed economic benefits be portrayed. The very heart of the NEPA process requires that environmental effects be handled with an adequate level of detail so that they can be compared to economic and technical considerations (CEQ 1501.2b).

It appears that the nature of future industrial developments that may be triggered by the pipeline are not as "unknown" as the draft ES would have us believe. The ES itself states that "natural gas may make it possible, or at minimum more practical, to build a metal fabricating plant or ammonia fertilizer factory in Coos County" (Page 71, 6th para.). Further, the website maintained by Coos County displaying questions and answers regarding the pipeline lists a gypsum manufacturer, two steel mills, a secondary wood products plant, and a glass manufacturer as examples of industries who might have located here is natural gas was available (www.co.coos.or.us/gasqa.htm).

Nor should identifying the "potential locations" of future industrial development be a problem. The Port of Coos Bay maintains an inventory of industrial sites in Coos County, and it shows that virtually all available industrial lands are adjacent to or closely associated with the Coos Bay estuary.

Thus, there can be no excuse for not portraying the environmental impacts of future industrial development with the same degree of precision as the economic impacts.

This section of the ES should be rewritten to embrace a balanced analysis of both the environmental and economic impacts of future industrial development as an indirect effect of pipeline construction.

ALTERNATIVES INCLUDING THE PROPOSED ACTION

- 9. Page 14, "No Action Alternative": This contains the confusing discussion of the County's fallback position if the BLM easement is not granted. See discussion under Comment #5 and #6 above.

AFFECTED ENVIRONMENT

- 10. Page 17, "General Setting of the Proposed Action": This should be rewritten to include a general description of the area where most of the indirect and cumulative impacts of the pipeline will take place - namely, the Coos Bay Estuary.
- 11. Page 18, "Air Quality": The statement "no data is available regarding the current levels of noxious gases..." is simply not true. It reflects the pervasive bias throughout the document against identifying and analyzing indirect and cumulative effects. At a minimum, this section should be rewritten to include the most current data from EPA's Toxics Release Inventory, as well as the emissions of record from the Beaver Hill municipal waste incinerator.
- 12. Page 20, "Water Quality": It is astounding that a discussion of water quality as a function of the existing environment does not even acknowledge the existence of the Coos Bay estuary. This should be rewritten to include data from EPA's Toxics Release Inventory, as well as summarizing existing reports regarding water quality in the Coos Bay estuary.
- 13. Page 28, "Public Health": How is it possible to discuss public health, as a function of the present situation, and not mention the fact that Coos County has the highest cancer rate among all mid-sized to large Oregon Counties? (Oregon State Cancer Registry, 1996-1999)
- 14. Page 29, "Coos County General Economic Data": The statement "timber production diminished significantly following the impacts of several forestry-related environmental issues" perpetuates an incorrect myth. In reality, several studies forecasted a downturn in timber production and timber related portions of the economy before the spotted owl and other issues came into play. The reasons

primarily intended to justify and promote a decision already made rather than objectively analyze a situation.

SUMMARY

- 3. Page v, "Need for Action": As written, this paragraph completely misses the point. This section should outline the current socio-economic conditions in the Coos Bay area that indicate a need for enhanced economic and industrial development.
- 4. Page v, "Purpose of the Proposed Action": The natural gas pipeline is clearly a project designed to foster and facilitate industrial development in the Coos Bay area. Of this, there can be little doubt. Pre-election publicity made the point that "... businesses have actually decided not to locate here, simply because we don't have natural gas. We know that access to natural gas will help create thousands of jobs. It will attract new businesses..." (Pipeline Committee, 1999). This section should be rewritten to reflect this reality. The purpose of the proposed action most assuredly is not to "gain a perpetual or renewable right-of-way easement..."
- 5. Page v, "No Action": This section is confusing in the extreme. The first paragraph correctly describes the No Action scenario - the pipeline would not be built, present conditions remain status quo. The second paragraph suddenly jumps all the way to the decision process as it relates to the Proposed Action. It states that if the Proposed Action is not selected for implementation, the county will go ahead and build on a slightly different route that bypasses federal land. If this is true, why hasn't this option been included as another alternative in the ES, as it should be? As written, this section comes across as trying to send a signal to potential ES reviewers - "if you come down too hard on the environmental impacts, we'll just go ahead and build around the federal lands". That may be within the County's jurisdiction to do, but such nuances are inappropriate in a BLM document.
- 6. Page vi, Table 5-2: the "No Action" column is wrong. It shows numbers for the County's "dodge the federal land" option. It should be revised to reflect the correct No Action orientation, i.e., the pipeline is not constructed.

PURPOSE OF AND NEED FOR ACTION

- 7. Page 3, "Purpose and Need": Comments #3 and #4 also apply here. This section also makes the statement "The need of (sic) the proposed action is to meet expectations of the Coos County ballot measure #6-63..." The circular logic here is difficult to grasp. Obviously, there was a set of socio-economic conditions that prompted Coos County to propose building the pipeline as a means of fostering economic development. Measure #6-63 was simply the means to fund the pipeline proposal. What is needed here is a brief synopsis of the rationale for proposing the pipeline construction in the first place. As written, this section is in direct violation of CEQ 1502.13.
- 8. Page 5, "New Industrial Gas Users": This section correctly states that it is hoped "the availability of natural gas will attract new manufacturing and commercial facilities to Coos County". But then it goes on to squish any sort of meaningful analysis by stating "it is not possible to quantify the potential environmental impacts of unknown future facilities and their potential locations". This illustrates the serious pro-development bias and unbalanced analytical methods that permeate the entire ES.

It is disingenuous to dismiss any sort of portrayal of environmental impacts because of "unknown future facilities" while at the same time using these same "unknown future facilities" to generate glowing reports of the economic benefits they will bring to the area. See, for example: "The economic development impact of natural gas would be great..." (Page 71, 7th para.). "... total employment in the Coos Bay area would be over 2,900 jobs higher ten years after natural gas is introduced" (ibid). "However, within ten years employment could increase by over 2,900 in the region because of the availability of natural gas" (Page 74, 1st para.). Obviously, the speculative nature of future industrial

were harvesting on private lands far in excess of sustainable levels, the export of raw logs for processing outside of the timber producing region; and, changes in technology which reduced manpower needs per unit output. This should be rewritten.

- 15. Page 30 "Recreation": This should be rewritten to include a description of the significant recreational use currently being made of the Coos Bay estuary.

ENVIRONMENTAL CONSEQUENCES

- 16. Page 39 "Air Quality": This section well illustrates the inadequacy of the Draft ES. We are told that the only indirect effect of building the pipeline is that "beneficial and measurable reductions in sulfur emissions may occur...". Thus, we are being told that, even though industrial development great enough to provide 2900 new jobs will occur, these new industries will apparently all be zero-emission facilities and will have no impact whatsoever on existing air quality. Unless the laws of physics have been repealed, this is simply not possible. This should be rewritten to include a valid analysis, and the section covering cumulative impacts should be developed.
- 17. Page 65, "Aquatic Ecosystem - Indirect and Cumulative Effects": This section does not even mention the existence of the Coos Bay estuary, yet that body of water is the one most directly affected by the industrial development expected to be triggered by the pipeline. This should be rewritten to include a discussion of the indirect and cumulative effects of new industrial development on the estuary.
- 18. Page 71, "Static and Dynamic Efficiency Effects": This tells the reader that a family home in Coos County would save "\$410 in annual utility bills by switching from electric to natural gas heat". This does not appear to include the cost of conversion which is significant in Coos County because most homes are not equipped with ducted heating systems. I suggest a valid economic analysis of the true cost of conversion be included.
- 19. Page 73, "Summary of Direct, Indirect and Cumulative Economic Effects": No mention is made of the significant role that transfer payments, specifically the income of retirees, play in the local economy. The total economic impact of a single retiree household has been valued as equivalent to 2 to 3.7 factory jobs. If industrial development cuts off the inflow of new retirees and/or results in an outmigration of retirees, the impacts could be significant. This possibility should be identified and discussed.
- 20. Page 74, "Public Health and Safety": This section should address, given the existing level of air and water pollution and the high cancer rate, the range of possibly detrimental effects that additional inputs of pollutants from new industries attracted by the availability of natural gas may have.

I believe that an adequate discussion of the indirect and cumulative effects, specifically relating to the enabling and fostering of industrial development in the vicinity of the Coos Bay estuary by the pipelining, would be one of the most important parts of a viable ES. The Draft ES treats them as non-existent or insignificant. In reality, they meet several of the CEQ criteria for significance.

The Coos Bay estuarine ecosystem is a unique and important area. It has been compromised to some degree by past actions, and receives inputs of toxic pollutants on a continuing basis presently. The effects of adding significant new pollutants are highly uncertain and involve the unique risk of pushing the ecosystem to the threshold of catastrophic collapse, thus meeting the criterion at CEQ 1508.27b5.

Publishing an ES with the limited analysis depicted in the Draft may establish a precedent whereby future federal actions (for example: the federal permits that will be required to extend the pipeline across the bay

to the North Spit) will also find it unnecessary to discuss indirect and cumulative effects. The existence of this possibility meets the test of significance at CEQ 1508.276c.

The pipeline has been described in the Draft ES as one of a number of actions that will be needed to enhance the economy of the Coos Bay area. It can be inferred, given the lack of any attempt to depict or analyze cumulative effects, the BLM considers them insignificant. However, CEQ 1508.276f states that significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment and, further, that significance cannot be avoided by breaking down a project into small component parts.

RECOMMENDATION: I feel that the Draft ES is so inadequate as to preclude meaningful analysis, and I ask that the BLM prepare and circulate a revised draft, as per CEQ 1502.2a, which properly handles the indirect and cumulative effects of the gas pipeline as outlined above.

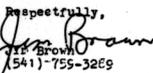
I must point out that the incompleteness or unavailability of portions of the relevant data pertaining to the Coos Bay ecosystem is not an excuse in cases such as this. The fact that data are incomplete and unavailable, in fact, triggers other specific requirements that must be included in an ES (CEQ 1502.22).


Ron Sedler

P.O. Box 206
EIS Comment p. 2.

The Draft EIS, page 10, has the transmission line extending to the edge of Coos Bay. Early discussions placed the Coos Bay terminus as being somewhat south of Coos Bay. As I recall, the Millington area was the most commonly mentioned site. Now, however, the pipeline will run through Coos Bay for several miles to a spot near the CE/NB Water Board Office. What environmental, geographical or regulatory factors dictated such a change? What is the additional cost to the tax payer?

As a result of shifting the terminus point, will any area be excluded from gas service? Specifically Bunker Hill or the East Side areas?

Respectfully,

Jim Brown
(541)-755-3269

P.O. Box 206
Lakeview, OR 97449
2/26/02

COOS BAY DIST OFFICE
EIS COMMENT p. 2

Bob Guntur, Project Coordinator RE: 2800 Draft EIS
EIA Coos County Natural Gas
1300 Airport Lane Pipeline
North Bend, OR 97459

Comments on Draft EIS:

Given the events of 9/11, what would be the impact on a EPA tower(s) and lines in the event of a pipeline break with subsequent explosion and fire? In case of such a scenario, I believe the following questions to be germane:

- a. If such break occurred at 2 am in section of pipeline east of Fairview, how long would it take to detect the break and shut the gas off?
- b. What would be the impact of an explosion of this magnitude on the structural integrity of the tower(s)?
- c. What would be the expected temperatures of the flames at ground level? At line level? How long would the towers withstand these temperatures. How long would the overhead lines withstand these temperatures? Is it reasonable to assume that the tower and lines would survive the initial explosion?
- d. In the event of a tower collapse or transmission line failure, what would be the consequences to the electrical service to the South Coast?
- e. Are there any historical examples of a gas pipeline explosion in a high voltage transmission right-of-way? If so, what happened?
- f. If there is no scientific evidence to predict the impact of a disastrous break accompanied by an explosion and fire, wouldn't it be both reasonable and prudent to carry out some tests before building a pipeline in a high voltage transmission right-of-way?

The Draft EIS in at least two places (page 11, and Appendix H 5) refers to hanging a gas line from bridges. Wouldn't this make a line vulnerable to either deliberative destructive acts or thoughtless vandalism? Again, how long would one expect it to be turned off? What would be the effects of a gas-fed fire on the typical bridge in the area?

What will be the diameter of the main transmission line? The Draft EIS says 12 inch, the NW Natural Gas brief, filed with the FUC, states 10 inch.



March 6, 2002

U.S. Bureau of Land Management - Coos Bay District
Environmental Impact Statement - Coos County Natural Gas Pipeline
Project Coordinator, Bob Guntur
1300 Airport Lane
North Bend, OR 97459

Statement For The Record In Support of the
Proposed Action Alternative - Coos Bay Wagon Road Route

The Board of Commissioners of the Oregon International Port of Coos Bay supports the construction of a natural gas pipeline from a location southwest of Roseburg, Oregon, to the Coos Bay/North Bend area in Coos County, utilizing the Proposed Action Alternative - Coos Bay Wagon Road Route.

In reviewing the material supplied in the Draft Environmental Impact Statement (EIS), it is evident this route will...

- produce the least short-term impact on various ecosystems (habitat and wildlife) delineated through the EIS,
- prevent unnecessary disruption of traffic flow on a major state highway (Oregon 42),
- minimize the total amount of public funds required for construction, and consequently the future rate of pipeline-related property tax increases for Coos County residents, and
- allow for long-term economic benefit and prosperity for a distressed region of Oregon.

We strongly urge adoption of the Proposed Action Alternative through approval of the Draft Environmental Impact Statement by all cooperating federal and state agencies and all interested entities representing the private sector. The availability of natural gas as an energy source for industrial, commercial and residential uses will have significant positive impacts on the future viability of the Coos County region of Oregon's south coast.

Sincerely,


Mike Waldrop, President
Board of Commissioners

Board of Commissioners - Oregon International Port of Coos Bay
Mike Waldrop, President; Gary Gregor, Ph.D., Vice President;
Ingvar Doessing, Secretary; Cheryl L. Scott, Treasurer;
Jon A. Barton, Commissioner

cc Coos County Board of Commissioners
Coos County Pipeline Project Office
Northwest Natural Gas
City of Coos Bay
City of North Bend

125 Central Ave., Suite 300 / P.O. Box 1215 / Coos Bay, Oregon 97420-0311 / Phone: 541-267-7678 / Fax: 541-269-1475
State of Oregon: Tokyo, Japan; Seoul, Korea; Taipei, Taiwan, R.O.C.
Representative: Phone: 81 35 275-9321; Phone: 82 2 753-1349; 1439; Phone: 886 2 723-2310, 2311
Offices: Fax: 81 35 275-9325; Fax: 82 2 753-0154; Fax: 886 2 723-2312

March 13, 2002

Bob Gunther
Project Coordinator
Coos Bay District, BLM
1300 Airport Lane
North Bend, OR 97459

Mr. Gunther:

The following represents my review and comments on the Draft E.I.S. for The Coos County Natural Gas Pipeline. Please include my views as part of the public input.

Chapter 2 Alternatives:

CONCERN:

Three alternatives are listed, but the second paragraph under NO ACTION on pages v, and the discussion on page 14 seem to contain an additional alternative. Should it also be listed?

Chapter 3 Affected Environment

CONCERNS:

On page vi the summary identifies five categories of potential impacts on the natural and built environment used in this E.I.S. evaluation. Then it describes the results using a different category that was not on the list, "negligible short-term". That is at best confusing and possibly misleading.

The only impacts listed are restricted to the construction and operation of the pipeline. No mention is made of impacts, direct, indirect and cumulative, on the Coos Bay Estuary which will harbor the industries brought in by the existence of the pipeline. Those same industries are the very purpose for the pipeline. The impacts of those industries have to be addressed for the Draft EIS to be relevant.

-No mention is found in the EIS of the potential industrial emissions impacting air and water quality, public health or recreational fishing, crabbing and clamming.
-There is no mention of potential impacts on existing commercial fisheries that are dependent on natural biological productivity of the Coos Bay Estuary.
-There is no consideration of impacts on local transportation, housing, industrial water supply and related services. I find these omissions to be major shortcomings of the document.

The EIS, with a voice of authority, gives quantitative direct, indirect and cumulative economic affects of the pipeline in terms of jobs, dollars and annual dollar impact on the bay area on page 73. Yet the Draft EIS on page 5 states that, "It is not possible to quantify the potential environmental impacts of unknown future facilities and their potential locations." This statement is unfounded.



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
PORTLAND DISTRICT, CORPS OF ENGINEERS
POST OFFICE BOX 2946
PORTLAND, OREGON 97208-2946

March 15, 2002

Operations Division
Regulatory Branch
Corps No.: 2000-00544

Ms. Sue E. Richardson
Bureau of Land Management
Coos Bay District Manager
1300 Airport Lane
North Bend, Oregon 97459-2000

Dear Ms. Richardson:

The following comments are being provided by the U.S. Army Corps of Engineers (Corps) in response to the Coos County Natural Gas Pipeline, Draft Environmental Impact Statement, dated December 2001.

(Table S-1) The Corps authority is under Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act. If approved, the Corps will issue a permit under these statutory authorities.

In the abstract and the proposed action description, it states that the pipeline would cross 188 streams and one wetland. It is recommended rewording the statements as follows, "the pipeline would cross 188 streams and/or wetlands". A stream could have wetlands adjacent to it or within the stream's corridor.

Chapter 1 (Authorizing Actions and Relationship to Statutes and Regulations): We recommend rewording the phrase, "The proposed action is in conformance..." to say, "The proposed action would comply with..."

Chapter 2 (Alternatives Including Proposed Action): No comment.

Chapter 3 (Affected Environment), Table 5: The Oregon Coast Coho Salmon has been listed as threatened under the Endangered Species Act. We recommend that an additional appendix be added for National Marine Fisheries Service Endangered Species Consultation on the coho salmon. Since the Oregon Coast Steelhead is a candidate species, conferencing is not required; however, it would be prudent to include the steelhead in the request for endangered species consultation letter.

- The Coos Bay Area has already identified and mapped future industries in other regional prior planning. That is where future industries will be located. The map for the region should be mapped and included in the EIS. Most of these future industries...

-The compilers of the EIS could have applied the same strategies used on page to quantify data on current emissions by existing metal fabrication and other fertilizer plants which are identified on page 71 as possible future industries. Existing plants could have been selected from various locations in the EIS. They could then identify the types and amounts of air and water borne chemicals, particulates, and thermal emissions related to those plants for examples of what to expect. This comparative data would be at least as accurate, from a scientific viewpoint, as the projected job and economic numbers found on page 73 and elsewhere, and as the information comparing population growth as a function of available natural gas found on pages 71-72.

The Draft EIS does not cite easily available, and reasonably recent, data on any of the following:

- a) existing economic impacts of commercial crab, salmon, clam, and oyster harvest in the Coos Bay Estuary.
- b) existing economic impacts of sports crabbing, clamming, and fishing in the estuary.
- c) Environmental Protection Agency listing of major environmental problems in the Coos Bay Estuary, i.e.: toxic chemicals; high rates of juvenile salmon mortality; high bacteria loading; degraded commercial shellfish beds.
- d) Coos County air quality with pollutants listed by weight.
- e) Coos Bay Estuary water quality listing existing heavy metals and other toxics by weight.
- f) Studies mapping TBT concentrations in the estuary.

Chapter 4 Environmental Consequences of Each Alternative

CONCERNS:

See concerns listed above.

In summary, the Draft EIS on the Coos County Natural Gas Pipeline does not seem to consider or identify the major impacts on the Coos Bay Estuary that will derive directly, indirectly and cumulatively from the pipeline project. We are already paying for mistakes of the past. The potential for degradation of the bay requires that those conditions be identified and quantified to protect against future losses. This deficiency needs to be addressed.

Respectfully submitted,

Bill Poppe
Bill Poppe
94550 Angler Lane
North Bend, OR 97459

-2-

Chapter 4 (Environmental Consequences), Tables 13 through 22: A review of these tables indicates that there are 188 pipe crossings, of which 112 of them are above stream, within road crossings. Just a point of information, if a pipe crossing is embedded within a roadway and above the elevation of a culvert where the stream passes, a separate permit is not required for the pipe crossing because there would be no additional fill in a water of the United States.

Chapter 5 (Consultation and Coordination): No comment.

Appendix "C", Maps: We recommend adding a map of the preferred pipeline route that shows the 188 pipeline crossings of streams and/or wetlands. The map should indicate the crossing sites by numbering them from 1 to 188. In addition, it is recommended that the map in Appendix C showing the location of the block valves along the pipeline route be amended to reflect the crossings. Although a number of the 188 crossings may not require Department of the Army authorization from the Corps, we recommend that all 188 crossings be reflected.

We recommend that the cut and fill volumes for each of the 188 crossings are reflected. This could be prepared as a table.

Thank you for the opportunity to provide comment on the Draft Environmental Impact Statement. If additional information or clarification is required, please contact Ron Marg at the letterhead address or telephone (503) 526-4390.

Sincerely,

Lawrence C. Evans
Lawrence C. Evans
Chief, Regulatory Branch

Copies Furnished;

Coos Bay Field Office (Urbanek)
Oregon Division of State Lands (Lobbeld)

COOS BAY DIST OFFICE
 WILL C. BUNNELL
 95811 COOS SUMNER LANE
 COOS BAY, OREGON 97420
 541 269 2138
 wilcbln1@att.net

March 18, 2002

Bob Gunther, Project Coordinator
 Bureau of Land Management
 Coos Bay District
 1300 Airport Lane
 North Bend, Oregon 97459-2000

Reference: Coos County Natural Gas Pipeline
 Draft Environmental Impact Statement
 Refer to: 2800 of Dec 7, 2001

Subject: Comments on Referenced Document

The material in this letter is in addition to a 12-page set of questions about the proposed pipeline that I submitted earlier.

Summary:

1. The Draft EIS does not convey enough information to allow an informed judgement to be made among the proposed alternatives. An economic and environmental baseline, consisting of no pipeline installation, should be included.
2. The Draft EIS does not adequately describe, nor does it adequately analyze, the benefits and detriments of alternate pipeline routing. It does not analyze the varied geologic formations the pipeline will encounter on alternate routes.
3. The Draft EIS does not adequately establish a well-reasoned and properly weighted set of selection criteria, nor were such criteria used in evaluating the proposed pipeline alternatives.
4. The Draft EIS does not adequately address many critical issues, among them economic factors, environmental impact, health and public safety, during construction, operation, and repair or maintenance of the proposed pipeline alternatives.

Bunnell 3/15

construction reserves or the cost of construction delays. No mention is made of funds to be retained for use in carrying operational costs until enough paying natural gas customers can be hooked up to make the pipeline economically viable. Nor does the EIS give any time frame when breakeven operation of the pipeline can be expected to occur, nor whether any or all laterals must be connected to make the project viable. No schedule is given for installing gas distribution systems within the planned customer area. Although it is planned that start-up operational costs for the first year will be carried by the gas supplier (NW Natural Gas) breakeven may occur much later than that. Note also that the gas customers eventually will have to pay all these costs, however well hidden they may be. The EIS should show in detail what these costs can be expected to be.

12. The Draft EIS does not adequately address questions of operation and safety for each pipeline routing alternative during periods of weather disturbance, in which access roads may be closed and power and telephone service may be lost due to wind-topped trees. Floods and landslides can be expected to differentially affect alternate routes as well, but the EIS does not address these issues.
13. The Draft EIS significantly lacks adequate discussion of operation and safety for each pipeline routing alternative during and following earthquakes.
14. There is a significant lack of quantified data in the Draft EIS. Few of the quantities that do appear are adequately justified or traced to their origins. Moreover, measurement data are not presented in standard format (mean, standard deviation, and number in sample). Nor are estimated data presented with calculations and estimation bases, nor are data ranges or upper and lower bounds presented. No graphs are presented showing how data change over time, with their upper and lower bounds if estimated, or with measurement deviations if the data are historical.
15. Data obtained by aid of computers do not show sufficient relevant factors about computer programs used, to permit independent evaluation. The EIS should show factors used, including well-reasoned data and parameters

5. The Draft EIS makes no mention of industrial production potential of up to (the cited) 24 billion cubic feet of natural gas per annum. For example, how many tons of steel, tons of fertilizer, or kilowatt-hours of electrical energy per annum, or what by-product production (type and quantity) might be produced. No references from potential industries are cited. No experts from these industries were consulted. Other than a passing reference of up to 2900 jobs in ten years, no analysis of the economic impact of this production potential is presented.
6. The Draft EIS does not adequately present project organization and assignment of responsibilities for the major phases of the project: evaluation, design, construction, operation, and maintenance. These factors will be critically important as they invoke environmental issues, and they will involve health and public safety, as well.
7. The Draft EIS does not adequately address how project supervision and technical responsibility during project detailed design, design review, and plan approval will be handled.
8. The Draft EIS does not adequately describe how oversight organization and control of construction will be maintained, nor how final acceptance/rejection criteria and final authority will be handled.
9. The Draft EIS does not adequately discuss the roles to be played by Douglas County and Coos County governments as regards cost of construction, operation and maintenance.
10. The Draft EIS does not adequately discuss financial liability during pipeline construction, operation, and repair or maintenance.
11. The Draft EIS does not adequately present project cost breakdowns and budget allocations for each implementation phase, for each alternative considered. Contract vehicles (fixed price, time and materials, incentive fee, etc.) and contract award practices are not described in any way, yet they can have profound impact on project costs. No mention is made of a subcontracting plan, nor of subcontract administration. No mention is made of

Bunnell 4/15

as entered, methods of program calculation and logic, collection and formatting of results.

16. I realize that in many areas, useable data are currently unavailable. But this circumstance makes it imperative that relentless effort be expended to develop and present credible data. I suggest that rewrites of this document should vigorously supply properly presented, quantified data, complete with histories, calculations, and justifications for the numbers cited.

Specific comments:

1. p. v: "Need for Action" Although a reference, ECONorthwest, and a related computer program, are cited, the structure of the savings of \$6.7 million should be spelled out in detail, at least in an appendix. The EIS should show the savings by year, by industry, by consumer type. The savings should also show costs to taxpayers, (individual and industrial) of construction, operation, and maintenance of the pipeline. The savings should also reflect total cost to the consumer of conversion from existing energy sources to natural gas.
2. p. v: The "No Action Alternative", as described in the EIS, is merely an alternative pipeline routing, and should be addressed as such. In contrast, the "No Action Alternative" should address the consequences of not installing the pipeline at all; this should be done in quantitative economic and environmental terms, over a suitable time period, say ten years. This will form a baseline by which to judge the pipeline project.
3. p. vi: Table S-2: It appears that "Estimated Costs" in this table reflects immediate cost of pipeline construction only. If this is the case, additional entries should be made (with full justification in an appendix) to reflect estimated costs of operation and maintenance of each alternative (including "No Action", see above) over periods of, say, 5, 10, 15, and 20 years, with time cost of money factored in. Finance amortization (bond pay out and retirement) should be included, and the numbers should be worked through to show as a bottom line the actual annual tax cost to representative Coos County tax payers will be over these time periods. The "No Action" column should be completely reworked as described in comment 2 above.

4. P. 3: Purpose and Need: The purpose of the proposed action is to install and operate a natural gas pipeline, laterals, and related terminal equipment, is it not? The purpose of the EIS, on the other hand, is to present the environmental and economic implications and trade-offs of various alternative approaches to achieve that end. Thus, the EIS should contain sufficient information to permit each alternative to be compared with each other alternative and with the baseline alternative of not installing a pipeline at all. This definitely means that the environmental and economic impact of operating each pipeline alternative must be fully considered.
5. The only need shown in the EIS for this pipeline is economic. The EIS seems to take the position that operation of this pipeline will reduce environmental pollutants in the Coos Bay area, but if pollutant reduction is to be taken as a "need", then that position, and the means by which pipeline operation can serve that need, should be completely justified in the EIS, in fully researched, credible, engineering detail.
6. P. 4: Statutes and Regulations: Are all relevant legislative acts and government regulations cited? For example, how is "Pipeline Safety and Community Protection Act of 2000" to be addressed?
7. P. 4: Anticipated Future Gas Pipeline Projects: Future costs, environmental as well as financial, of the contemplated lateral pipelines to other communities and industries in the area should likewise be addressed. These items have not been adequately covered in the Draft EIS.
8. P. 5: New Industrial Gas Users: "...no industrial commitments have been made..." The EIS should address by reference here, and spell out later in the document, standards for allowable industrial environmental pollution. This should include allowable pollutant emission standards, calibrated to the Coos Bay and other industrial environments (for which see the baseline environment) for a suitable selection of typical heavy industries, say, steel fabrication mills, fertilizer plants, and other such, known to impose severe pollutant loading on the environment.

9. The EIS should address the indirect and cumulative effects of industrial pollutants from these classes of industry on the Coos Bay estuary and other areas to be served by lateral pipelines.
10. P. 7: Alternatives Including Proposed Action: "...gas is stripped of corrosive elements, excess water, heavier hydrocarbons..." What standards have been established for allowable quantities of these materials?
11. How are quality control measures implemented to insure these standards are met?
12. What measures are to be taken if these standards are not met?
13. How will internal corrosion of the pipe resulting from these materials be (a) detected, (b) measured, and (c) repaired? How often will these be done?
14. How will collection of these materials in low points of the pipeline be controlled?
15. P. 7: "...its only above-ground components are line markers, test stations, bridge crossings and valve settings..." are not stress loops to be provided?
16. How will movement of the pipeline be controlled; for example, in the deep wet clay forming the roadbed of CBWR in Sumner Valley?
17. P. 7: "...the proposed action...is the shortest practical route..." Is the proposed route indeed the shortest? From examination of the maps included in the EIS, we conclude that Segment H could be shortened by about 1.5 miles, by routing the pipeline via PP&L right of way instead of CBWR. Even if this route is more difficult of traverse, it should be fully analyzed and costed as an alternative.
18. For that matter, is "shortest" to be the sole criteria for route selection? The Draft EIS appears to completely ignore health and public safety factors in assessment of routes. For example, by choosing to route the pipeline in the CBWR through Sumner, the pipeline is made to pass close by approximately 21 residences, some in the vicinity of known geologic faults.

19. I suggest that the planners consider in detail a number of route and installation alternatives. The impact of this pipeline will be felt with ever increasing power for years into the future, when many factors, population, economic, and environmental, can be expected to assume changing importance. The fact that many of these factors are currently unknown makes the need for this type of forward thinking and planning even more compelling.
20. For one alternate routing example, the main pipeline could be routed from Fairview to Coquille, where a large potential customer is currently located. Coquille could then serve as one hub of gas distribution in Coos County, with another hub being located in Coos Bay. In this example, the pipeline could be routed from Coquille to Coos Bay along Highway 42, or the existing railroad right of way, with minimal impact. A lateral could be extended to the Beaver Hill waste treatment facility, along Highway 101, or as another alternate route, from North Bank Road, taking the Beaver Hill road from there to Highway 101, and from Beaver Hill, the lateral could be extended to Bandon along Highway 101.
21. P. 7: "...the proposed action includes 5 block valves..." What is the amount (in standard cubic feet) of gas in the proposed pipeline between the Fairview block valve and the Isthmus Slough block valve?
22. In case of pipeline rupture (various kinds) how long will it take to bleed this gas to atmospheric pressure, after the block valves are closed?
23. How are the block valves to be operated?
24. What automatic safety features are to be provided?
25. Will local volunteer fire protection personnel and other local emergency personnel be trained to operate these valves?
26. In case they are, who is to bear the liability burden?
27. Will local volunteer fire protection personnel be expected to establish valve watch duty hours? Will they be paid?

28. Assume that there is a pipeline rupture and fire, for example, in front of Sumner Store. What will be the duties of the local volunteer fire department personnel (Sumner RFPD)? Who will operate the block valves in Fairview and Isthmus Slough (both outside Sumner RFPD boundaries)?
29. If the block valves are to be operated remotely by signal lines, where is the control center to be located?
30. If there is to be a control center, how does the control center monitor the pipeline? Who will operate it? How do emergency personnel communicate with the control center? What communication backups are to be provided?
31. Where will the block valve signal lines and communication lines be located?
32. If overhead, what happens when windstorms push trees over onto the lines?
33. If buried, what happens when an earthquake not only ruptures the pipeline in several places, but also breaks the signal and communication lines?
34. How are these block valves to be tested and maintained? How often?
35. For that matter, questions about pipeline leaks and their potential impact on health, public safety, and the natural environment are not adequately addressed in the EIS. We were told at an information briefing at Coos Bay Library on 19 February, that pipeline personnel plan to walk or drive slowly along the pipeline every year, or "...more often, if needed..." looking for discolored vegetation, ground disturbance, odor of gas, etc., to detect leaks. Since, in the currently "preferred alternative," the road will be paved, with the pipeline buried beneath the pavement, these disturbances presumably will be found along the shoulders of the road, or perhaps detected as odors rising in adjacent buildings or residences. When leaks are found, "...they fix them..." This obviously means they have to dig down to the pipe, in the middle of the road, shore the trench, where it may be 5 or more feet deep in saturated wet clay, find by some means the actual leak(s), and "fix

- it(them)" by some undescribed means, possibly depressurizing the pipeline. This will be a very interesting exercise after even a minor earthquake in our area has produced possibly several dozen breaks or leaks of various sizes. In this connection, a lead pipeline consulting engineer stated in the cited meeting, "...in case of an earthquake, the pipeline will break in only one place..." Perhaps a geologic/engineering analysis and plan can be included in the EIS that will show those of us outside the gas pipeline industry how this result is to be achieved.
36. P. 11 Schedule, Sizing and Route Selection Factors: "...scheduled for completion into Coos Bay by the end of 2002..." The EIS should furnish this schedule, showing start and end dates for each construction phase, for each segment of each alternative route.
37. The schedules governing road blockages should include provisions to insure that emergency services (fire, medical, law enforcement) can be furnished at all times to all residences and other areas for each alternate construction route.
38. P. 11: In reference to a potential lateral to the Bandon area, several alternative usage profiles in the Bandon area are mentioned in the EIS. Each of these alternatives (including the "No Action" or baseline alternative) should be adequately explored as to cost, environmental impact, direct, indirect, and cumulative, and economic consequences, for individuals and businesses.
39. P. 11: In reference to a potential lateral to the Beaver Hill site, in its role as a waste disposal facility, and in its potential role as a power generation site, full development of the environmental impact, direct, indirect, and cumulative should be shown, as well as cost, cost recovery, and economic impact.
40. None of these laterals and consequent natural gas related usage would be possible without the construction and operation of the main pipeline, and so are a direct consequence of the pipeline, and should be adequately addressed in the EIS.
41. P. 13: Proposed Action Utility Corridors and CBW Road: "...the gravel-surfaced road sections will be paved after construction of the pipeline..." What is the reason for this paving?
42. Is the pipeline project funding the paving?
43. What entity is responsible for maintenance funding of the paving?
44. What entity is responsible for funding maintenance of the road and paving when pipeline maintenance or emergency repair activities disrupt it? These questions apply to both Douglas and Coos counties.
45. Do the existing gravel-surfaced sections meet state and other relevant criteria as to contour, grade, load-bearing capacity, width, shoulder, guard rail, signage, and other such requirements for paved roads?
46. What changes (i.e.: which curves, grades, etc., at what mileposts) must be made before paving? What other existing road contours (paved and unpaved) will be changed or improved prior to installation of the pipeline?
47. If no changes are to be made, then what is the justification from a public safety standpoint for not doing so?
48. The EIS should explain in detail what additional procedures (and their costs) would be imposed on road improvement efforts by the existence of the pipeline in that alternative.
49. How are future road maintenance and improvement cost increments, arising as a result of having to work around the pipeline, factored into future pipeline costs? Who will pay these costs?
50. P. 13: "...NW Natural anticipates to initially deliver 2 billion cubic feet..." How many businesses and households must be converted to natural gas achieve this number?
51. The EIS should provide estimated conversion costs (plans, permits, material, labor, inspections,

- maintenance) of conversion of various types of home systems and businesses in the planned distribution areas.
52. The EIS should show the results of surveys conducted to determine how many homeowners and businesses in the planned delivery area are actually willing to convert to natural gas, and their time frame for doing so.
53. P. 13: "...the maximum potential...is 25 billion cubic feet per year..." From EIS Appendix J, it appears that this number was obtained by calculating the maximum flow in the 12-inch pipeline, at maximum pressure. How much lateral pipe flow does this include?
54. How many steel mills, fertilizer plants, power generation plants of what size, etc., will this 25-billion cf/yr flow sustain?
55. Even more importantly, what is the economic and environmental impact on each region of this potential industrial population?
56. P. 15: Highway 42 (continued): "...traffic disruption would be considerable...for 6 months or more...traffic would be delayed..." the EIS should show, segment by segment, pipeline construction schedules and traffic routing for the Highway 42 pipeline alternative.
57. P. 15: Alternatives considered but rejected: "...straight-line option was rejected...after considering costs..." The EIS should show the relevant cost and environmental impact analysis for this alternative.
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Bunnell 15/15

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William C. Bunnell
Engineer

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Klamath-Siskiyou Wildlands Center

POB 102 Ashland OR 97520 (541)488-5789 joseph@kswild.org

Bob Gunther
Project Coordinator
Coos Bay District
1300 Airport Lane
North Bend, OR 97459

3/23/02

RE: Coos County Natural Gas Pipeline Draft EIS

Greetings,

These are Klamath-Siskiyou Wildlands Center's (KS Wild) and Umpqua Watersheds, Inc. official comments on the Coos County Natural Gas Draft EIS (DEIS). These are updated comments to those that you received in your office on March 22, 2001. You can void those comments, as all issues raised therein are included in these comments.

Please consider these in the evaluation of the DEIS and the in the formation of your final environmental analysis. The proposed pipeline will cross approximately 60 miles of public and private lands in Coos and Douglas counties, Oregon. Long term pipeline will require 40 feet of space to be kept clear of larger brush and trees. Access roads to the BPA corridor will be restore as needed for pipeline construction and access for operations and maintenance.

KS Wild and Umpqua Watersheds Inc. support the use of natural gas and especially the increased air quality that would result in the Coos Bay Area (hereafter Bay Area) from the proposed action. However, we do have some concerns about the proposed pipeline and associated development that would likely occur in the Bay Area as a result of this action.

The DEIS is Inadequate

We want the Final EIS (FEIS) to explore in more detail the impact that the proposed action would have on the human environment. NEPA requires an EIA to consider each alternative in enough detail so "that reviewers may evaluate their comparative merits." 40 CFR section 1502.14(b).

NEPA requires documenting Connected, Indirect and Cumulative effects.

The FEIS should determine the effects to the environment if the pipeline were subject to maintenance causing normal and abnormal landslides in the notoriously unstable Coastal Mountain range. The 100-year flood event must be considered. Likewise, The Coast Range is naturally subject to stand replacing forest fires. If burning trees were to fall over the right-of-way, protruding their limbs into the ground, what would the effect on the pipeline be? Factors that can cause explosions must be assessed in for a route that traverses under a road with heavy-log truck traffic.

- it(them)" by some undescribed means, possibly depressurizing the pipeline. This will be a very interesting exercise after even a minor earthquake in our area has produced possibly several dozen breaks or leaks of various sizes. In this connection, a lead pipeline consulting engineer stated in the cited meeting, "...in case of an earthquake, the pipeline will break in only one place..." Perhaps a geologic/engineering analysis and plan can be included in the EIS that will show those of us outside the gas pipeline industry how this result is to be achieved.
36. P. 11 Schedule, Sizing and Route Selection Factors: "...scheduled for completion into Coos Bay by the end of 2002..." The EIS should furnish this schedule, showing start and end dates for each construction phase, for each segment of each alternative route.
37. The schedules governing road blockages should include provisions to insure that emergency services (fire, medical, law enforcement) can be furnished at all times to all residences and other areas for each alternate construction route.
38. P. 11: In reference to a potential lateral to the Bandon area, several alternative usage profiles in the Bandon area are mentioned in the EIS. Each of these alternatives (including the "No Action" or baseline alternative) should be adequately explored as to cost, environmental impact, direct, indirect, and cumulative, and economic consequences, for individuals and businesses.
39. P. 11: In reference to a potential lateral to the Beaver Hill site, in its role as a waste disposal facility, and in its potential role as a power generation site, full development of the environmental impact, direct, indirect, and cumulative should be shown, as well as cost, cost recovery, and economic impact.
40. None of these laterals and consequent natural gas related usage would be possible without the construction and operation of the main pipeline, and so are a direct consequence of the pipeline, and should be adequately addressed in the EIS.

- maintenance) of conversion of various types of home systems and businesses in the planned distribution areas.
52. The EIS should show the results of surveys conducted to determine how many homeowners and businesses in the planned delivery area are actually willing to convert to natural gas, and their time frame for doing so.
53. P. 13: "...the maximum potential...is 25 billion cubic feet per year..." From EIS Appendix J, it appears that this number was obtained by calculating the maximum flow in the 12-inch pipeline, at maximum pressure. How much lateral pipe flow does this include?
54. How many steel mills, fertilizer plants, power generation plants of what size, etc., will this 25-billion cf/yr flow sustain?
55. Even more importantly, what is the economic and environmental impact on each region of this potential industrial population?
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41. P. 13: Proposed Action Utility Corridors and CBW Road: "...the gravel-surfaced road sections will be paved after construction of the pipeline..." What is the reason for this paving?
42. Is the pipeline project funding the paving?
43. What entity is responsible for maintenance funding of the paving?
44. What entity is responsible for funding maintenance of the road and paving when pipeline maintenance or emergency repair activities disrupt it? These questions apply to both Douglas and Coos counties.
45. Do the existing gravel-surfaced sections meet state and other relevant criteria as to contour, grade, load-bearing capacity, width, shoulder, guard rail, signage, and other such requirements for paved roads?
46. What changes (i.e.: which curves, grades, etc.. at what mileposts) must be made before paving? What other existing road contours (paved and unpaved) will be changed or improved prior to installation of the pipeline?
47. If no changes are to be made, then what is the justification from a public safety standpoint for not doing so?
48. The EIS should explain in detail what additional procedures (and their costs) would be imposed on road improvement efforts by the existence of the pipeline in that alternative.
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Bob Gunther
Project Coordinator
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1900 Airport Lane
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3/23/02

RE: Coos County Natural Gas Pipeline Draft EIS

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Conversely, the potential for the pipeline to create a large wildfire due to its inherent qualities must be considered in the assessment.

Part of the pipeline is proposed to go under (or next to) the playground at the Lookingglass Grade School. The grade school is close to the Roseburg BLM land the right-of-way is planned for. If Roseburg BLM right-of-way, enabling the pipeline to go in proximity to the school, this should be analyzed under cumulative effects of the FEIS.

We are concerned that the DEIS did not discuss the potential for a gas leak. The public should be informed about the likelihood of such an event, with at least anecdotal evidence of existing or past such pipeline in remote areas. Do these pipe ever leak and what would be the worst case scenario if such events occur? This is an important question the FEIS should consider in depth as many important resources occur in the project area. Mitigation measures to prevent such an unlikely event should be proposed and evaluated.

If indeed there are specific business which have expressed interest in moving to the Bay Area and other effected communities if natural gas were available, these potential developments must be disclosed in the FEIS. All actions foreseeable connected to the proposed must be disclosed in the FEIS.

The BLM should completely document the Need for this project. If the need is to attract business to the Bay Area, the cumulative effects analysis must assess the impacts of this project. The Coos County website, for instance, gives examples of industries that failed to locate in the area because "we don't have natural gas" as two steel companies and a gypsum plant. If the act of BLM granting the right-of-way will result of heavy industry locating in the Bay Area, a cumulative impact analysis must include an analysis of the negative environmental impacts the right-of-way would enable. Indirect effects must also be included in this analysis. These may include growth inducing effects and changes in the pattern of land use and subsequent environmental impacts.

Cost Considerations

We are opposed to taking short cuts if spending a little more money would afford greater protection to natural resources or endanger human lives. The citizens of Coos County generously voted in enough financial resources that short cuts do not have to be taken. At the Public meeting on Nov. 29, it was announced that the cost estimate would be \$30 million instead of \$31 million originally projected. There is no reason for any cost cutting measures that would result in less environmental protections.

Public Lands

The BLM should survey for Survey and Manage species. Adhere to the federal nexus.

Fish Habitat

We are very interested in the fish habitat improvement that is a part of this project. We support the increased fish passage that would be attained as a part of the proposed action. We are skeptical that no short term degradation to fish habitat through sedimentation would occur. Is there a way that fish improvement projects

can move forward without the proposed action? Can you describe the fish habitat improvement in more detail? New road construction or reconstruction is regarded as greatest negative watershed effect on salmonid habitats. Increases in sedimentation reduces pool volumes, and may additionally impact deep pools, which can serve as temperature refugia for fish.

Waterways

The BLM must comply with state water quality standards promulgated under the Clean Water Act.

Soils

Do not exceed soil compaction Standards and Guidelines. This project should not increase soil erosion, particularly entering waterways. Past, present and future activities are required to be considered when evaluating soil conditions.

Noxious Weeds

This project has the potential to serious weeds into areas less infested with these species. What is the likelihood that the mitigation measures would prevent of stop the spread of noxious weeds? The BLM must disclose the consistent failure of its criteria to prevent the spread of noxious weeds in the past.

Species Concerns

Please protect Sensitive, Threatened and Endangered Species. Do not lead to a trend to list any species. Maintain viable populations of all native species and do not degrade habitat for any Management Indicator or other target species.

Archeological Sites and Significant Native American Sites

Prevent any potential impact to any tradition Native American uses of the area and any archeological sites. The proper procedure for identifying cultural resources of traditional value is located in on page 1 of the National register Bulletin #38.

Thank you for this opportunity to comments and please keep us informed as this project progresses.

Respectfully,

Joseph Vaile
For KS Wild and

Francis Eatherington
Umpqua Watersheds, Inc.
886 Raven Lane
Roseburg, OR 97470



FAIRVIEW RURAL FIRE PROTECTION DISTRICT

96775 Fairview Summer Lane
Coquille, Oregon 97423
Phone (541) 396-3473
Fax (541) 396-6223



March 21, 2002

To: U.S. Department of the Interior
Bureau of Land Management
Coos Bay district
1300 Airport Lane
North Bend, Oregon 97459

From: Virgil Williams, Chief
Fairview Rural Fire Protection District
96775 Fairview Summer Lane
Coquille, Oregon 97423

Subject: There are several concerns that Fairview R. F. P. D. has that would inhibit the fire departments ability to provide fire and life safety for the citizens that live within the fire district.

Reference: Coos County Natural Gas Pipeline Draft Environmental Impact Statement.

A. Reference Map (Page 7 of 10) Indicates a block valve will be installed in the 12" natural gas pipeline adjacent to Fairview Road, Bonneville Power Administration, and Pacific Power & Light Transmission line crossing.

1. In most cases with pipeline damage the initial result in a release of natural gas. The second event would be a massive natural gas spill that would require the response of a hazardous material team. Should natural gas find an ignition source a fireball would erupt causing a structural or a wild land fire, and possibly both.
2. The by-product of a natural gas fire is dense black smoke that can easily reach 3000 feet. Flame impingement would be high enough to reach the transmission lines, and result in damage to equipment and pose a serious safety concern for personnel.
3. Should such an incident occur the travel of mutual aid from Coquille would be limited because Fairview Road would have to be shut down. This not only would hamper firefighting activities, but also would disrupt one of the main evacuation routes. Water would have to be transported from Steel Creek in

the winter months, and from Lee Valley in the summer on the south side of the block valve location, and from Evans Creek to the north.

4. The time it takes to get a pipeline operator to close the block valve at the town of Dora would range from 30 minutes to over an hour. Closing block valves is the safest, and most effective method of extinguishing a pipeline fire. With this type of incident fire departments usually concentrate their activities to protecting exposures. The amount of water required for this action would be approximately 2500 gallons per minute. This fire flow is beyond the capacity of the existing fire department equipment.

B. Reference EIS Draft (Chapter 3, Page 28, Second Paragraph "Public Health and Safety")

1. The last sentence in this paragraph reads "after construction is completed, the primary issue for public safety and pipeline operation would be damage from someone digging without permission and heavy equipment (such as a backhoe) or unauthorized use of explosives in the near vicinity of the pipeline."
2. Reference EIS Draft (Page J-7, and Page J-8)

With the block valve footprint surrounded with a chain link fence with a locked gate, and depending on location, traffic volume, the fence will be protected with concrete or pipe barricades. Page J-8 indicated that the block valve controls extend 5'8" above grade. Will the fence, and barricades prevent fuel trucks, log trucks, or a lowboy truck with a shovel from damaging this block valve assembly?

3. In my opinion the block valve at Fairview needs to be relocated away from the main route of travel, and at a distance that would prevent flame and smoke impingement on the Bonneville Sub Station, Pacific Power & Light, and Bonneville Power Administration 230 and 115 KV transmission lines.

Sincerely,

Virgil Williams, Chief
Fairview R. F. P. D.

for Bob Gunther
Project Coordinator
Coos Bay District
BLM
1300 Airport Lane
North Bend
OR 97459

3/22/2002

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for Bob Gunther
Project Coordinator
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Coos Bay and surrounding area has considerable natural charm and resources, which are not yet fully capitalized upon in terms of attracting all types of tourists, and 'clean' and more environmentally friendly industries such as aquaculture. How will the introduction of gas burning industry affect this scenario?

We respectfully offer as our comment on this draft EIS that it does not address the indirect and cumulative effect of the installation of the gas pipeline on Coos bay and surrounding area.

Dear Mr Gunther

Re: Coos County Gas Pipeline, Draft Environmental Impact Statement.

Firstly, thank you to BLM for initiating and publishing this document.

We request that our names and address are withheld from public review and disclosure.

It is claimed that the installation of this pipeline will provide approximately 2900 jobs for the Coos Bay area. Yet page 5 of Chapter 1 states that 'because no industrial commitments have yet occurred it is not possible to quantify the potential environmental impacts of unknown future facilities and their potential locations'.

If a specific number of jobs can be quantified then an assumption must have been made about who potential employers are, which means that the potential environmental impact can be assessed.

Even if it is not possible to quantify numbers of new jobs there are certain types of industries to whom the availability of natural gas would be an attraction to locating in this area so the type of potential employer can be identified and a best and worst case impact can still be assessed.

P5 Chapter 1 states that 'future new facilities utilizing natural gas will be required to undergo their own environmental impacts analyses, within the required permitting processes for new construction.' We understand that this process is myopic and only looks at the particular facility under review and does not take into account the cumulative impact of emissions from neighboring facilities.

Availability of industrial zoned land, transportation and communication systems strongly indicates that any new industry would locate in and around Coos Bay. Therefore the statement that potential locations of future facilities is unknown is unfounded.

Sincerely



Oregon

John A. Kitzhaber, M.D., Governor

March 21, 2002

Mr. Bob Gunther, Project Coordinator
Bureau of Land Management
Coos Bay District Office
1300 Airport Lane
Coos Bay, OR 97459

Dear Mr. Gunther,

Subject: Draft Environmental Impact Statement - Coos County Natural Gas Pipeline

The Department of Land Conservation and Development (DLCD) has reviewed the draft environmental impact statement (DEIS) for the above referenced project. The Bureau of Land Management (BLM) is the lead federal agency for the National Environmental Policy Act review addressing construction of a natural gas pipeline from southwest of Roseburg, Douglas County to Coos Bay, Coos County. The preferred route for the pipeline runs through Reston, Douglas County and then roughly parallel to the Coos Bay Wagon Road to Coos Bay, Coos County. The pipeline would be buried within existing rights-of-way of Pacific Corps, Bonneville Power Administration, and the Wagon road. The pipeline would deliver natural gas to distribution facilities in Coos Bay and North Bend, with smaller laterals built to serve Coquille, Myrtle Point, and perhaps Bandon.

In a letter dated April 27, 2001, the Department provided detailed comments to BLM in response to the scoping notice for the proposed project. We are re-submitting those comments as an attachment to this letter since our review of the DEIS indicates that those comments have largely not been addressed. As we stated in our previous letter, the proposed federal action is subject to the coordination and consistency requirements of the federal Coastal Zone Management Act (CZMA, 16 U.S.C. § 1451 - 1464). Yet, the DEIS does not even list the federal CZMA as an applicable law (see Chapter 1, p. 4). While BLM may be intending to address coastal zone consistency at the final EIS stage, we are surprised to find no discussion on this matter within the DEIS.

In closing, feel free to contact the Department should you have any questions about this letter, the attached April 27, 2001 letter, or the OCOMP. Information about the OCOMP can also be found on-line at <http://www.lcd.state.or.us/coast/index.htm>. The primary coastal program contact for this project continues to be Ms. Christine Valentine of my staff, and she can be reached at 503-373-0050 X250 or by e-mail at christine.valentine@state.or.us.

Sincerely,

Nan Evans, Manager
Oregon Coastal Management Program

Department of Land Conservation and Development
COOS BAY DIST OFFICE
635 Capitol St. NE, Suite 150
Salem, Oregon 97301-2540
Phone (503) 373-0050
Director's Fax (503) 378-5518
Main Fax (503) 378-6033
Rural/Coastal Fax (503) 378-5518
TGM/Urban Fax (503) 378-2687
Web Address: <http://www.lcd.state.or.us>



Mr. Bob Gunther, BLM

-2-

March 21, 2002

cc. Coos County
Douglas County
City of North Bend
City of Coos Bay
City of Coquille
City of Myrtle Point
City of Bandon
DSL
ODFW-Portland
DEQ-Portland
Conf. Tribes Coquille Indians
Conf. Tribes Coos, Lower Umpqua, Siuslaw Indians
Corps of Engineers
Bonneville Power Administration
Biological Information Specialists Inc.



Oregon
John A. Kitzhaber, M.D., Governor

Department of Land Conservation and Development
635 Capitol St. NE, Suite 150
Salem, Oregon 97301-2540
Phone (503) 373-0050
Director's Fax (503) 378-5518
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Rural/Coastal Fax (503) 378-5518
TGM/Urban Fax (503) 378-2687
Web Address: <http://www.lcd.state.or.us>



April 27, 2001

Ms. Sue E. Richardson, District Manager
Bureau of Land Management
Coos Bay District Office
1300 Airport Lane
Coos Bay, OR 97459

Dear Ms. Richardson,

Subject: Scoping - Coos County Natural Gas Pipeline

The Department of Land Conservation and Development (DLCD) has reviewed the March 29, 2001 scoping letter and associated website materials describing the Bureau of Land Management's (BLM) proposal to direct the preparation of an environmental impact statement (EIS) addressing construction of a natural gas pipeline from southwest of Roseburg, Douglas County to Coos Bay, Coos County. The EIS is required before BLM can issue a right-of-way for the project to cross federal lands. A preferred route for the pipeline has already been identified based on a 1999 feasibility study. The proposed route would run through Reston, Douglas County and then roughly parallel the Coos Bay Wagon Road to Coos Bay, Coos County. The pipeline would be buried within existing rights-of-way of Pacific Corps, Bonneville Power Administration, and the Wagon road. The pipeline would deliver natural gas to distribution facilities in Coos Bay and North Bend, with smaller laterals built to serve Coquille, Myrtle Point, and perhaps Bandon. The location of the laterals has not yet been determined.

The above-described federal proposal is subject to the coordination and consistency requirements of the federal Coastal Zone Management Act (CZMA, 16 U.S.C. § 1451 - 1464). The project area crosses through and terminates within Oregon's "coastal zone", designated under the federally approved Oregon Coastal Management Program (OCMP). Construction of the pipeline is reasonably likely to affect land and water uses and natural resources of Oregon's coastal zone. As such, the federal development project and any associated facilities or actions must be designed, planned, and implemented in a manner consistent with the OCMP. DLCD, as the state's designated coastal zone management agency, will ultimately be responsible for concurring that BLM's proposed action will be consistent with OCMP requirements.

As part of federal evaluation process, BLM will need to prepare a coastal zone consistency determination addressing how the proposed project, including associated facilities or actions, would comply with OCMP requirements. Your consistency determination will need to include a brief statement indicating whether BLM believes the project complies with the OCMP and must be supported by an evaluation of the proposed actions vs. the relevant coastal program policies. A detailed project description, information regarding any associated facilities and sufficient information to explain coastal zone effects must also be provided in support of BLM's determination.

Ms. Sue E. Richardson, BLM

- 3 -

April 27, 2001

see below for more on this topic. Alternatively, the more detailed analysis and justification could ultimately be provided in a separate coastal zone consistency determination.

A goal "exception" is required when a proposed action is specifically not allowed by the requirements of an applicable goal. If the selected alternative would involve actions that do not comply with the local land use program and the statewide planning goals, then the EIS or consistency determination must contain adequate information to support an exception. The exceptions process and standards are described at OAR 660 Division 004. At this time, we cannot determine absolutely whether any goal exceptions might be required because information is very limited, but we are available to work with the county and BLM with the goal of guiding the various alternatives and actions to not trigger the need for goal exceptions.

● The Statewide Planning Goals (OAR 660-15), as applicable.

The statewide planning goals are state regulations that are generally implemented through the applicable local comprehensive plan(s) and ordinances. The goals and associated rules can be accessed via DLCD's website (www.lcd.state.or.us). Local plans are acknowledged by the Land Conservation and Development Commission to meet the requirements of the goals. However, the goals apply directly in cases where an action is proposed that is inconsistent with a local land use program and a plan amendment or goal exception is pursued. A goal provision may also apply directly if the goal has been updated and the local land use program has not yet been brought into compliance with the updated requirements. Goal 19 for ocean resources is also applied directly by state agencies vs. local governments, but goal 19 does not apply to this project.

We recommend that BLM review the statewide planning goals as a way to begin to understand the types of policies and standards contained in local land use programs that would likely be applicable to a proposed project. Specifically, BLM should look at Goal 2 (Land Use Planning), Goal 3 (Agricultural Lands), Goal 4 (Forest Lands), Goal 5 (Natural Resources, Scenic and Historic Areas, and Open Spaces), Goal 6 (Air, Water and Land Resources Quality) Goal 7 (Areas Subject to Natural Disasters and Hazards), Goal 9 (Economic Development), Goal 11 (Public Facilities and Services), Goal 13 (Energy Conservation), Goal 16 (Estuarine resources), and Goal 17 (Coastal shorelands).

● The standards of selected state environmental laws (e.g. Removal/ Fill Law, state air/water quality standards, general fish and wildlife protections, Beach Bill, etc.).

Numerous state laws addressing the management of specific natural resources and land and water uses of the coastal zone have been incorporated into the OCMP. Based on our knowledge of the proposed project to date, we believe that the following laws incorporated into the OCMP could be applicable to the project. In order to fully determine how these laws might apply to the project, BLM will need to identify project elements such as stream crossings, wetland/riparian impacts, construction techniques including rehabilitation after pipeline installation, as well as steps that will be taken to avoid and minimize resource impacts or compensate for unavoidable

Ms. Sue E. Richardson, BLM

- 2 -

April 27, 2001

DLCD generally reviews projects requiring an EIS at the final EIS stage to ensure that a second review to address project modifications is not necessary and to allow the consistency determination and the state's review to concentrate on a selected preferred alternative vs. multiple alternatives. We would hope to address all federal actions associated with the project comprehensively but are not yet certain of whether BLM, as the lead agency, would be addressing coastal zone requirements for other federal agencies. We also ask BLM to explain when and how local, state, and federal permit requirements will be addressed. For example, a local project sponsor might be responsible for obtaining permits.

We anticipate that there will be considerable overlap in the issues that must be addressed in the EIS and to support BLM's consistency determination. BLM's preliminary list of topics to be addressed includes: socio-economic impacts, soil erosion, water quality, fish and wildlife, traditional tribal uses of the area, archaeological sites, and noxious weeds. We concur that these topics need to be addressed in the EIS but also find that waterway resources and wetlands, endangered and threatened species, and land use must be addressed in the EIS. With those inclusions, we believe the BLM list and coastal zone management list of topics that must be addressed will be comparable.

BLM can choose to include the consistency determination as part of the project EIS or can prepare a separate document with the EIS provided as supporting information. While it is BLM's responsibility to prepare the consistency determination, OCMP staff is available to discuss any questions you may have about coastal zone management requirements. BLM will need to specifically address project consistency with the following enforceable elements of the OCMP:

● The comprehensive land use plans and implementing regulations of affected local jurisdictions.

For this project, BLM will need to consider multiple local comprehensive plans and implementing land use regulations since the project will occur in multiple counties and cities. BLM will need to coordinate with the Douglas County and Coos County planning departments to determine how the county land use programs apply to the proposed actions. Since the project will terminate in the City of Coos Bay and will also affect the Cities of North Bend, Coquille, Myrtle Point, and Bandon, BLM also would need to coordinate with the planning departments of these communities.

BLM should identify all land use policies and standards applicable to the various alternatives - and specific actions contemplated under those alternatives - which are described in the EIS. We would expect the land use analysis to be most thorough for the preferred alternative but for land use requirements to be a consideration in all alternatives under review in the EIS. For at least the preferred alternative, any needed land use approvals should be identified, and the EIS should also contain an analysis of how the applicable land use policies and standards will be met, i.e. to the extent practicable provide the justification for needed local decisions. This would also ideally include justification for any needed local comprehensive plan amendments or goal exceptions;

Ms. Sue E. Richardson, BLM

- 4 -

April 27, 2001

impacts. BLM also needs to consult with the state agencies identified below to determine the applicability of these authorities and how to demonstrate compliance with these laws:

State Authorities	State Agency
Removal-Fill Law	Oregon Division of State Lands
State Submerged and Submersible Lands	" "
General Protective Regulations	Oregon Department of Fish and Wildlife
Air, Land & Water Quality	Oregon Department of Environmental Quality

The above list is not intended to suggest that BLM should not coordinate with other state agencies; the above list is only intended to highlight the key statutory requirements that DLCD would likely need to consider when reviewing BLM's consistency determination. As part of the coastal zone review process, DLCD would consult with these state agencies to determine whether the proposed project would be in compliance with these state authorities.

In closing, feel free to contact the Department should you have any questions about this letter or the OCMP. The OCMP is described at <http://www.lcd.state.or.us/coast/index.htm>. Or you may also contact Christine Valentine, coastal agency coordinator, at 503-373-0050 X250 or by e-mail at christine.valentine@state.or.us for more information. I ask that you also please address future correspondence regarding the project to Ms. Valentine.

Sincerely,

Nan Evans, Interim Manager
Oregon Coastal Management Program

- cc. Coos County
Douglas County
City of North Bend
City of Coos Bay
City of Coquille
City of Myrtle Point
City of Bandon
DSL
ODFW-Portland
DEQ-Portland
Conf. Tribes Coquille Indians
Conf. Tribes Coos, Lower Umpqua, Siuslaw Indians
Corps of Engineers



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 10
 1200 Sixth Avenue
 Seattle, Washington 98101

March 19, 2002

Reply To
 Att: ECO-088

Ref: 01-013-BLM

Bob Gunther, Project Coordinator
 Bureau of Land Management
 Coos Bay District
 1300 Airport Lane
 North Bend, Oregon 97459

Dear Mr. Gunther:

The Environmental Protection Agency has received the Draft Environmental Impact Statement (EIS) for the proposed Coos County Natural Gas Pipeline (CEQ No. 020024) for review in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

EPA Region 10 has used a screening tool to conduct a limited review of the draft EIS and, based upon the screen, we do not foresee having any environmental objections to the proposed project. Therefore, we will not be conducting a detailed review of the draft EIS.

Should you have any questions, please contact Bill Ryan of my staff at (206) 553-8561.

Sincerely,

Judith Leckrone Lee
 Judith Leckrone Lee, Manager
 Geographic Implementation Unit

Printed on Recycled Paper

Dear Sam - In regard to the to the construction of the gas pipe line - I would like to know why those in the County who will have no access to the monitor - must be taxed for it -

M. Mason
 -tax issue -
 (1/2 miles from the proposed line)

3/20/02 10:05 AM

To: U.S. Dept. of the Interior:
 Bureau of Land Management
 Coos Bay District, 1300 Airport Lane, North Bend, Oregon 97459

Subject: Coos County Natural Gas Pipeline:

From: Coos, Coquille Elders Agriculture Board:
 Co-Chair: George Barton 90056 Cape Henry Hwy Coos Bay

Sir/Mam:

As the Dept. of Interior is aware, the Coos Tribe and the Coquille Tribe have joined their tribal elders into a joint agriculture project under federal protection in their respective service areas.

After receiving the Draft Environmental Impact Statement for the proposed pipeline into Coos County, a number of questions arose that were not addressed in the original impact statement that will impact this agriculture project. We are requesting a group of the U.S. Army Corps of Engineers...

questions:

- 1) A economic impact analysis of a gas distribution system was not done... Why?
- 2) No analysis was done on the increased level of Hydrogen Sulfide or Sulphur Dioxide to the environment of the Coastal Estuaries.

- 3) No analysis was done on the cumulative effects of these and other pollutants combined with current releases of pollutants.

History:

Since the delivered gas (in total or in part) will be delivered from a porous gas field (i.e. Hydrogen Sulfide, Sulphur Dioxide and other pollutants) and since the current technology does not remove the total pollutants from the delivered methane gas being delivered to the user, the above questions must be answered.

Case in Point: there were three massive kill-offs of fish at the Bristol Petroleum facility on the north spit of Coos Bay due to sulphur dioxide emissions from the North Spit Refinery Mill. This is documented in: - We Have The Files -

We look forward to the answers to these questions... for further details please contact:

George C. Barton
 George C. Barton
 Co-Chair tribal
 Elders Agriculture
 Board of Directors
 541-888-3876



"Pat & John Simpson"
 <patjohns@ucinet.com>
 03/23/02 01:37 AM

To: "Bob Gunther" <bob_gunther@or.blm.gov>
 cc: "Ron Sadler" <ronsad@worldnet.att.net>, "Bobbie Stewart" <bs1gstew@gte.net>, "Vickie Crowley" <vcw@worldnet.att.net>, "Carol Doty" <crdoty@earthlink.net>
 Subject: Draft EIS Comment

Gunther
 March 23, 2002

Steve & Wesa Liles
 96955 Lone Pine Lane
 Coquille, Ore 97423

Bob Gunther,

The pipeline EIS must have a map showing the BLM land being crossed by the pipeline.

The draft proposal allows suppositions concerning numbers of jobs created but does not allow suppositions about pollution to the estuary and other sites by large manufacturing plants that create those jobs. This pollution will not enhance oyster beds, fishing or recreation in the river and estuaries. This pollution and undesirable traffic and congestion will not increase our important economy of tourism or retirees. Tourism and retirees demand a clean environment.

Therefore, there should be an accounting in the draft for the economic loss due to the increased pollution on such things as oysters, fishing, recreation, tourism diminishing, retirees moving away, health impact due to contaminated air & water, of views being blocked by smoke stacks, etc.

Our ridiculous striving for economic development will leave us no clean places for people to go to for vacations nor for retirement. Such shortsightedness.

I do NOT want the pipeline built. I resent the additional taxes, pollution and congestion.

I would like the EIS to totally stop the pipeline.

If it cannot, then I do NOT want the EIS to simply make the pipeline go around the BLM territory (which isn't even shown in the draft), because that would add unnecessarily to the cost of the pipeline and solve NO real problems created by the pipeline!

I had such hopes for an EIS. I have since decided that it is a very expensive farce, at least the way I see it being implemented here! Let me quote from Ron Sadler's letter to the County Planning department:

"The public comment period on the Draft EIS is open until March 25, 2002. In spite of this fact, your March 8 memo to the Planning Commission announces that they will be discussing conditional use approval of "the only feasible route". Is this not prima facie evidence that the choice of reasonable alternatives has, in fact, been limited? Could any action be better designed to discourage and squelch the rational public discussion of other reasonable alternatives that the EIS process is designed to foster?

"Your action makes a mockery of the EIS process. It indicates that a decision as to "the only feasible route" has already been made, and Coos County and the BLM view the EIS process as a pro forma exercise without any real utility. This is a direct insult to the citizens of Coos County, and a violation of federal regulations. It adds to the vulnerability of a process that is already on shaky ground legally."

Pat Simpson 541-347-2597 patjohns@ucinet.com
 435 Michigan NE
 Bandon, OR 97411

Bureau of Land Management
 1300 Airport Lane
 North Bend, Ore

These are our reasons for not accepting the Gas Pipe Line Onsofp property we have a total of 300 feet of BPA right of way, you have not tried to survey the route where you wish to go, as we have a water supply in this right of way that will be drained by the drilling under the river.
 Other reasons are Environmental impact on the watershed at the Bay.
 Nothing was brought up about the environmental impact in the study.

Sincerely

Steve Liles
Steve Liles
 Wesa Liles
Wesa Liles

MAR 23 10 49 21 AM '02



COQUILLE INDIAN TRIBE

P.O. Box 783 • 3050 Tremont • North Bend, OR 97459
 Telephone 541-756-0904 • FAX 541-756-0847

March 23, 2002

Mr. Bob Gunther, Project Coordinator
 BLM Coos Bay District
 1300 Airport Lane
 North Bend, OR 97459

Re: Coos County Natural Gas Pipeline Draft EIS

Dear Mr. Gunther:

The Coquille Tribe has reviewed the Coos County Natural Gas Pipeline Draft EIS document and submits the following comments specific to archeological and cultural resource concerns:

Pipeline Laterals (p. 10).

Although the possibilities of laterals to the communities of Coquille, Myrtle Point, and Bandon have not been "finalized," it is apparent that they are intended. The EIS should strongly emphasize the need for thorough cultural resource surveys along each of the proposed lateral routes, particularly in the Fairview area (see comments concerning Appendix B below).

Effectuated Environment: Cultural Resources- Direct Impacts (p. 40).

Project monitoring, as it is suggested, is insufficient. 1) The term "tribal members" should be changed to "designated tribal representatives of the effected federally recognized tribes." 2) Language should be amended to include the possibility of inadvertent discovery of archeological sites and/or isolates; and that mitigation of such discoveries should occur immediately and in consultation with the appropriate tribal representatives. 3) Language should strongly emphasize that cultural resources surveys were limited to exposed surfaces only (see Appendix B-12); and that monitoring may be required in areas of "potential" or "probability", especially: 1) those areas in the project corridor that were not surveyed because trespass was not granted; and 2) that were not surveyed because brush and vegetation cover did not allow it.

Appendix B: Cultural Resources.

The B.I.S. Report, prepared by Heritage Research Associates, does not address the need for extensive pre-project probing and project monitoring in the Fairview area. Although there is only one SHPO-recorded site, several decades of anecdotal reports from local

informants, coupled with the oral histories of the local tribes, suggest the very strong potential for much of the Fairview valley to be one very large and extensive archeological site. The B.I.S. report also does not address the pipeline laterals, and thus has little merit in considering the scope or areas of focus for cultural resource surveys along any of those proposed routes.

In closing, the comments here are intended only to address cultural resource concerns. Other issues that the Coquille Tribe might have as a government- or as a major contributor to the Coos County economy- would best be represented by either the Coquille Tribal Council or the Coquille Economic Development Corporation (CEDCO).

Thank you for the opportunity to comment.

Sincerely,

Donald B. Iry

Donald B. Iry
 Cultural Resources Program Coordinator

C: Tribal Council
 Culture Committee
 Confederated Coos Tribes

March 25, 2002

54628 Geiger Creek Rd.
Bandon, OR 97411
Ph: 347-4305

COOS BAY DIST OFFICE

2002 MAR 27 A 10:03

RECEIVED

Bob Gunther, Project Coordinator
Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

SUBJ: Comments on Coos County Natural Gas Pipeline Draft EIS

I make no pretense of being an expert on EIS documents. However, even a cursory look at this document reveals that BLM has produced a completely deficient study:

- CEQ 1502.2g requires an *objective analysis*, not a justification of the action already decided upon.
- NEPA (CEQ 1502.16b and CEQ 1508.8b) requires a study of the indirect effects.
- There is no attempt made to discuss cumulative environmental impacts as required in CEQ 1508.7.

p. 05 New Industrial Gas Users

"Because no industrial commitments have yet occurred, it is not possible to quantify the potential environmental impacts of unknown future facilities and their potential locations." Still, in several areas (e.g., pages 66, 67, 68 and 69) BLM has no problem quantifying potential economic impacts by these same non-existent industrial users.

p. 18 AIR QUALITY

The statement is made "...no data is available regarding the current levels of noxious gases..." This is false. Data is available from the EPA's Toxics Release Inventory and I know that a record of emission releases from the Beaver Hill municipal waste incinerator is a matter of record. In addition, the County has recently approved the burning of tires at the Beaver Hill facility; these projected releases should be factored into the other figures.

p. 34 Utility Corridors

The concern was raised in my previous comments about the siting of a gas pipeline within or adjacent to the BPA power lines, in as much as BPA had declared a moratorium on that practice because of safety concerns. Unless I have missed it, this issue has not been addressed in the EIS.

SUMMARY

This document, page after page, addresses cumulative environmental effects, if at all, as "no impact," "no anticipated impact," "none," "no foreseeable incremental effects," or as being *too speculative*. Yet this study goes to great lengths to include the ECONorthwest study to impress upon the reader the economic benefits of the pipeline while totally ignoring the statements on Page 3 of the Economic Impact Study:

"The impacts forecast in this report depend on *speculative assumptions* about the future provided to ECONorthwest by Northwest Natural and Forefront Economics. ECONorthwest made predictions about future market conditions... While we believe they are reasonable, the assumptions and predictions used in the economic impact analysis are nonetheless *speculative*." [my emphasis added]

I thank you for the opportunity for offering these comments. Regardless of the threat made under the No Action Alternative on page v of the Summary, significant revisions must be made to this document for it to meet the requirements of NEPA.

Roberta Stewart
Roberta Stewart

17

March 22, 2002

Bill and Pam Nelson
58511 Fairview Rd
Coquille Or. 97423

To Whom It May Concern:

We don't know as much as we should concerning this pipeline that is about to be put in, but as a longtime resident of the Fairview area we are a little concerned about the safety issues being raised from the fire departments stand point. We are volunteer firefighters as well as residents of the area and from what we can see from all the maps and statistics on the issue we are very concerned about being able to protect the citizens of the area and possible escape routes if there were to be any type of leak or fire.

I think that the layout needs to be rethought as to where the block valves are placed in relation to populated areas so that the residents of the areas are better protected.

Thank you for your time and please consider all of the possibilities involved in this project.

Sincerely

Bill and Pam Nelson

I have deep concerns about the northwest natural gas line running through the town of Fairview, OR.

1. The placement of a block valve on the edge of the main road nearly vertical under bonnevillie power main transmission lines.

This would entail a 12 inch pipe with approximately 900 lbs. pressure, as we are sitting on an earthquake fault line and our insurance company assures us that it is not an if but a when a sizeable quake will hit us. A line break and explosion could create a hellish blow torch, flames to 300 ft., high and melting all transmission lines from the Fairview sub station leading to all of southwest Oregon.

2. Broken lines could block any escape route for people trapped, plus prevent any help from reaching us from town.

3. There are Indian grave sites & camping areas where the gas line is to cross the river, and sites where they plan to put the block valve in, I cannot tolerate the desecration of my ancestors to satisfy the ego of the Coos County Commissioners.

4. I have noticed the agreement between Northwest Natural Gas and our county commissioners states that coos county would be responsible for any breaks, explosions, leaks caused by quake, slide, flood, or any other reason. It seems to me a major disaster could be avoided by simply relocating the pipeline and block valve.

If left as planned on E.I.S. it could turn out that Fairview and its people would be the sacrificial lambs for our commissioner egotistical whim for glory. IT'S JUST NOT RIGHT!!!

sincerely,
Jim Metcalf

March, 23rd, 2002

Hello,

I'm writing to express my concern on the proposed natural gas pipeline. My original understanding was it would be routed down highway 42. That would have made the line easily accessible in an emergency, earthquake, fire, ect. I have many doubts about changing the route to the old wagon road but safety is by far the biggest issue. My questions regarding a break in the line, fire, explosion, natural disaster, ect., have not been addressed. What is the environmental impact in these situations? I think since the new route will take it through my front yard my questions deserve to be addressed.

This proposed new route is not what I voted on. I feel the coos county commissioners have changed the original plan to suit their needs and wants without consulting the taxpayers. They have ignored the fairview residents concerns about safety and environmental issues.

In conclusion I only have this to say, I will not allow this on my land nor will my neighbors.

sincerely,

Michelle Clouston

Hello,

I'm writing this letter with concern as to the safety of my family and the other residents of fairview.

This letter pertains to the proposed pipeline project that will split down the middle of Fairview, or Fairview Summer rd.

I'm the owner of Double C Disk and U.S.A Jet Door co. We are a tire recycling plant that provides ground gear for trawl fisheries in the U.S., Canada, Mexico, Russia, Japan, and Iceland. Our business is located adjacent to the power substation in Fairview. It is my understanding that the proposed pipeline route will run between 30 ft. up to 1,500 ft. from our main building.

I'm very concerned that the pipeline will be routed through our area. Let me tell you a situation that occurred not long ago. Being a 10 yr. member of the Fairview Fire Department I was involved in a rescue a few years ago when our dept. was called out on a man with serious health complications. Heavy rains had caused landslides on Hungry Mountain, flooding had closed Summer rd. and Lee Valley. All access to Fairview was closed. Coquille ambulance responded but could only travel as far as the top of Hungry Mountain. Our department had no choice but to carry this patient across a dangerous slide to the waiting ambulance. A complicated rescue due only to rainfall... Now imagine what it would be like in event of an earthquake out in our area. How will aid reach our residents? What if its in the middle of summer with a fire or leaking gas line to boot? Who will come to our aid then?

I feel our business, our lives, and our future are in jeopardy with the pipeline going through the middle of our community. The pipeline representatives that have visited our small valley have not been honest or forth coming with answers to our concerns.

There has been no guarantee as to our safety with an open ground valve adjacent to our property. Who is responsible for the environmental impact statement? Disaster preparedness? Safety of the residents? Safety of my employees?

Please respond to my letter and address my concerns. I feel my families future is at stake.

Thank You,
Jody Clawson

Dana Gaab
Box 991
North Bend, Or. 97459
March 25, 2002

To: 541 757-4303

Bob Gunther, project coordinator [Natural Gas Pipeline]
1300 Airport Lane
North Bend, Or 97457

As stated the draft EIS document will "analyze the proposed action as compared to two alternatives, including no action.

Considering the County Planning Departments recent memo to the County Planning Commission seeking approval to allow the pipeline along the Coos Bay Wagon Road as "the only feasible route I find the county's actions at odds with the intended process. Specifically CEQ regulation 1506.1a2

As a citizen of Coos County I demand the BLM adhere to all applicable regulations and complete a full and objective EIS.

I further urge the BLM to find the "no-action alternative to be in the best interests of the citizens of Coos County.

Dana Gaab

HC 83 Box 4101
Coquille, Oregon 97423
541-396-4200
3/24/02

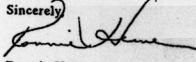
BLM
1300 Airport Lane
North Bend, Oregon

Re: Coos County Pipeline EIS

Dear Sue Richardson:

My question to you, and to the entire Bureau of Land Management, is this: Why on earth would you involve yourself and our lands in what promises to be an ongoing boondoggle when the county commissioners have openly said on numerous occasions in public meetings that if they had any trouble with you then they'd simply change the route?

I recommend that you find against going across BLM-managed lands. As noted in the EIS, the county has at least two alternative routes that don't involve you. Let them use them.

Sincerely,

Ronnie Herne

cc: State, Fed

Robert W. & Carol N. Doty
P. O. Box 511
Bandon, OR 97411
March 25, 2002

COOS BAY DISTRICT OFFICE
1300 AIRPORT LANE
NORTH BEND, OR 97459

Bob Gunther, Project Coordinator
Coos County Natural Gas Pipeline
Coos Bay District, BLM
1300 Airport Lane
North Bend, OR 97459

Dear Mr. Gunther:

Today we are e-mailing these comments to you, and will also have them postmarked by 5 pm in order to comply with the close of the 60-day comment period. Please place these comments in the record concerning the Pipeline Environmental Impact Statement.

Our expertise is in land use planning and Oregon's land use laws. The EIS provides limited discussion to land uses (forestry, grazing, recreation, and transportation) and the affects of the pipelines on land uses. We draw your attention to the County's adopted and state-acknowledged Coos Bay Estuary Management Plan, and we were disappointed to see that no mention has been made of this plan which is part of the Coos County Zoning and Land Development Ordinance. In fact, no consideration has been given in Chapter 3 or Chapter 4 to the effects pipeline construction and the hoped-for resulting industrial development will have on the Coos Bay Estuary. This was very disappointing when we consider that much of the economic and environmental health of the county is dependent upon the health of the Estuary.

The county's Estuary Management Plan devotes 376 pages to the Uses, Activities, Management Objectives, and Land Development Standards to be addressed in the Upper and Lower Bays, the Isthmus Slough, the North Spit and other portions of the Estuary which may be affected by land uses and activities. The construction of a pipeline is a land use, and anticipated and potential development should also be a part of the Environmental Impact Statement.

Both Chapters 3 and 4 require serious attention to the Estuary Management Plan, and at a minimum, how negative impacts will be mitigated in order to comply with county and state law.

To be specific and to provide an example: p. 20 of the EIS lists the Isthmus Slough as an estuary which will be crossed if the proposed plan is approved. Pages 129-130, and pages 354-417 of the County's Estuary Management Plan describe the uses, activities management objectives, and special conditions which must be applied when the Slough is affected.

In order for the county to construct the pipeline, it will be necessary for it to make application for and prove that pipeline construction will comply with those applicable portions of the Coos Bay Estuary Management Plan. Any future use, activity or development in the Estuary must bear the burden of proof that it complies with the Plan.

While we are not fully knowledgeable about the routes being considered for the pipeline, we believe each route plans to cross sloughs and bays which must be addressed by the EIS in light of relevant portions of the Estuary Management Plan. We request that this be done prior to completion of the final draft.

Finally, two general concerns about the project:

(1) We live in an area, the City of Bandon, which may never receive service through the proposed project. We believe we are helping to pay for part of the construction through the state's \$20 million contribution, and that perhaps it is not fair for us to bear additional costs. That has not been addressed in the economic analysis portion of the EIS.

(2) The project appears to have been ill-conceived in that decision makers did not conduct a serious evaluation of how realistic the projections are for job creation in Coos County, yet the major reason given for building the pipeline is to provide an economic boost to the people of the county.

Robert W. Doty
Robert W. Doty

Carol N. Doty
Carol N. Doty

COOS BAY DISTRICT OFFICE
March 25, 2002
90421 Lampa Lane
Myrtle Point, OR
97458

Bob Gunther, Project Coordinator
Coos Bay District, BLM
1300 Airport Lane
North Bend, OR 97459

(follow-up to e-mail of 3/26)

Re: Comment on Coos County Natural Gas Pipeline Draft Environmental Impact Statement

1. When the bond vote was put before the people of Coos County to finance the pipeline, the Highway 42 alternative was the most likely route for laying the pipeline. The route being given favor now, the Coos Bay Wagon Road along the East Fork Coquille River, travels through some of the largest remaining intact forest habitat and related salmon spawning habitat in the Coquille Watershed, and in the state of Oregon. I believe the healthy ecosystem represented here is of the utmost value to the present and future health and well-being of all creatures, including humans, of course. I believe that any inconvenience to travelers or financial cost mentioned in the EIS as reasons for rejecting the Highway 42 alternative ignores the value of retaining healthy ecosystem, and the wisdom upon which current watershed restoration and protection is founded: "Protect the best, restore the rest." For this reason, I reject the route now being given most favor, the Coos Bay Wagon Road.

2. The EIS fails to give adequate consideration to the Indirect and Cumulative Impacts of the gas pipeline on the healthy functioning of the natural environment of the Coos Bay area. Since Coos County bears an extremely high cancer rate, there is reason to believe that pollution of the air and water is of grave concern. No baseline assessment of the current health of our natural environment is referred to in this EIS, (such as might be found in the State of Oregon's Environment published by the Oregon Progress Board). On page 18 in the EIS there is a statement that "no data is available regarding the current levels of noxious gases". This is false (data on the air quality is available through the EPA), and is an example of how the health of the environment is brushed aside and discounted. Possible future impacts of the new industries the pipeline is meant to attract to our area are not addressed; the reason given is that since the exact industries are not now known, such consideration would be purely speculative. Yet, when predicting future economic benefit, the document is magically no longer uncertain, but very specific in predicting 2,900 new jobs within ten years (page 71). I believe that the environmental impact, which is the mandated purpose of this document under the National Environmental Policy Act, is not adequately addressed. An environmental impact statement is NOT supposed to be a justification for a decision that has already been made, it is supposed to be an honest evaluation of impacts, to the best of our present knowledge. The EIS needs to be rewritten with current data on the health of the waterways and airshed of the Coos Bay area, with special attention to the spawning areas of the uplands, the Coos Bay, the wetlands, and the Coos and Coquille estuaries, and some adequate estimations as to the direct, indirect, and cumulative effects that the gas pipeline will have on our environment.

Yours,
Bonnie Joyce
Bonnie Joyce



DH0p2880@aol.com To: Bob_Gunther@or.blm.gov
03/26/02 09:31 AM CC: Subject: Fwd: environmental impact statement

--- Message from DH0p2880@aol.com on Tue, 26 Mar 2002 11:44:05 EST ---
To: coosbay@or.blm.gov
Subject Fwd: environmental impact
: statement

--- Message from DH0p2880@aol.com on Tue, 26 Mar 2002 01:56:50 EST ---
To: BobGunther@or.blm.gov
Subject environmental impact
: statement
Mr. Gunther,

Wouldn't the recent halt of timber sales due to the white cedar, root fungus problem warrant the need for further study of the pipeline construction and the impact of equipment moving in and out of waterways, streams, rivers and marshlands which could transfer this fungus?

David Hopkins
58344 Fairview Rd
Coquille, Or. 97423
541-396-4128

TO: Bob Gunther, project coordinator
Natural Gas Pipeline
541 751-4303

From: Monica Schreiber
concerned citizen
for 541 756 5762 ph- 756 2042
March 25, 2002
one page

Dear Sir,
I am writing to you to voice my opposition
to the natural gas pipeline as it is now being
proposed for Coos County. We need more input
and studies to come up with the most useful
way to implement this pipeline. If Northwood
Natural is not willing to foot the bill, they
must have decided it is not a good business
decision at this time. They are the experts.

I am appalled to see pipeline
expenditures on the Commission's agenda. I am
having much difficulty in reconciling our
Commission's actions with our community
needs. They are supposed to represent us.

I ask for more time, research
and community input on the pipeline.

Monica Schreiber
BX 1824
Coos Bay, Oregon
97400

Bob Gunther
BLM, Coos Bay District
1300 Airport Lane
North Bend, OR 97459

March 26, 2002

RE: Coos County Natural Gas Pipeline Draft Environmental Impact Statement

Dear Mr. Gunther:

Following are comments on the Draft EIS for the Coos County Natural Gas Pipeline

1. Lack of EIS for the laterals to Coquille, Myrtle Point, North Spit, and Bandon. The lateral to Bandon appears to be in doubt as to whether it will be constructed or not. However, the draft EIS should, but does not, include the laterals to the other three areas.
2. Right of way issues: Of the various public and private property owners, including the 37 residents (page 28), how many have agreed to right of way easements? The study does not address pipeline effects to the residential property owners or their willingness to sign easement agreements. I know one of the residential property owners is concerned with their well water being adversely affected by the pipeline construction, and the value of their property being decreased due to the pipeline right of way easement.
3. The U. S. Army Corps of Engineers is listed as a cooperating agency, but I did not find their input anywhere, especially in regards to stream and wetland crossings.
4. Appendix F, the letter from the U. S. Fish and Wildlife Service Endangered Species Consultation Letter of Concurrence, could not be commented upon since it was not received for publication. Will the opportunity be given to comment on the EIS when it includes this letter?
5. Lack of substantiation: Statements as to effect are given, more as an opinion than fact, since there are no studies or substantive backing. For example, plant and animal (includes insects, reptiles, amphibians, birds, mammals) species are listed and described as to their habitat and foraging. From this description, which could be derived from any encyclopedia or nature book, the study then draws the conclusion that there will be no adverse effect during construction. This may well be, but the study does not address long term or cumulative effects to the flora and fauna of the area.
6. Contradictory findings: In Appendix A, the Geotechnical Engineering Report discusses erosion around stream crossings, and the preference for conventional excavation to minimize long term erosion around smaller streams to bury the

pipeline below the stream bed. Boring, which has more soil erosion, is recommended for the larger streams and Isthmus Slough. Pipeline construction, with the type of equipment used, requires a working area of 30' to 60' along the entire length of the pipeline. (The 60' width requirement occurs in steep slope areas.) This increases soil erosion. There is also evidence of landslides and geologic movement due to previous earthquakes (Cascadia fault line). Despite the geologic report, the effects to streams from erosion were found to be negligible and limited to the construction period!

7. The study does not address the above ground features of the pipeline.
8. Indirect and cumulative effects: The draft EIS ignores the indirect and cumulative effects by ignoring the heavy industry Coos Bay and North Bend hope to attract with the natural gas pipeline. A metal fabricating plant and ammonia fertilizer factory is mentioned on page 71 of the draft EIS. These two industries would have a tremendous negative affect on the environment, directly and cumulatively, particularly to the air and water. Coos County has a higher incidence of cancer than Multnomah County - the introduction of heavy industry would not improve this statistic. This cumulative health and environmental cost should be included in the natural gas pipeline EIS.

As a property owner and a source of funding for the EIS and the natural gas pipeline, I would prefer to get the most for my property tax dollars and not harm the environment and the creatures in that environment, including myself.

Sincerely,

Lynne Leisy

Lynne Leisy
88643 Weiss Estate Ln
Bandon, Or 97411
phone: (541) 347-2641

March 25, 2002

Peter Ryan and Christina Alexander
500 Dean Mountain Rd.
North Bend, OR 97459

Response to the Coos County Natural Gas Pipeline Draft Environmental Impact Statement

Chapter 4, p.38, Proposed Action Effects Summation

Paragraph 6 sums it up very neatly: "The short-term and long-term direct, indirect and cumulative economic benefits of the proposed action are the primary reasons Coos County seeks to construct a natural gas pipeline." It is abundantly clear from the EIS Draft, media accounts, and statements by public officials these expected benefits would come from the heavy industrial manufacturing that natural gas availability will enable. It is also quite clear from media accounts, public officials' statements and matters of public record that this desired economic activity will be steered to the County urban renewal area on the North Spit and the North Bend Airport lands managed by the Port of Coos Bay.

The Council on Environmental Quality guidelines (CEQ 1508.8) describe the "effects" that must be considered in an EIS and the BLM seems to have complied with those guidelines in the sections that address the geological, environmental, and social/cultural effects of the pipeline construction itself. However the Draft completely falls apart when it comes to the effects of activities the pipeline will enable.

The BLM seems to have taken the position that it is impossible to analyze the negative impacts that might accompany the "short-term, long-term and cumulative benefits" of the enabled activities because it is not known which companies will actually locate here. CEQ 1502.22, has very specific guidelines for areas of analysis where there is "incomplete or unavailable information". The BLM seems to have ignored this section entirely.

There are many consultants and non-profits that could supply the "summary of credible scientific evidence relevant to evaluating reasonably foreseeable adverse impacts" mandated by CEQ 1502.22b3. The cost of this information would not be "exorbitant".

Perhaps a scientist in the employ of the National Association of Manufacturers might disagree, but most people would concur that heavy industrial activity creates pollution of one kind or another, be it noxious gases, airborne toxins, p.m.'s, liquid and solid effluents as well as possible detrimental health effects, esthetic blight etc.. A reasonable person might also concur that these effects might have cumulative impact and that the closer these industrial activities are to population centers and significant bodies of water, the greater the possible impacts. And that reasonable person might also wonder how much

ability our lands and water have to absorb these pollutants. CEQ1502b states "impacts shall be discussed in proportion to their significance". In not discussing what might be grave environmental, economic, and social effects of the enabled activities in the EIS, is the BLM saying these possibilities are of no significance?

There is compelling evidence that negative economic impacts of the very generous tax breaks offered in Enterprise Zones such as the North Spit/Airport lands might erode the tax base and strain the budgets of our poor communities when industries and their workers place heavy demands on infrastructure and public services. This is not discussed. There is no discussion in the Draft of whether new jobs created by the enabled activities would actually be filled by local residents or experienced workers from outside the area.

If local leaders realize their dream of attracting manufacturing industries to the North Spit and Airport lands in close physical, visual, and auditory proximity to residential areas and tourist destinations there is a strong possibility of serious negative impacts to quality of life, health, real estate values and to the viability of economic activities that rely on "natural beauty" or esthetic values. In short, the very perception of the greater Coos Bay area could change from that of an attractive place to visit or live to one of an ugly smokestack-industry town. The CEQ1502 instructions require this be discussed.

Should the BLM, in preparing its final version of the EIS, decide to comply with the CEQ guidelines which regulate its work as a federal agency and require a theoretical assessment of possible negative impacts of enabled activities, it could start by assessing the possible impacts of any and all of the past industries that have shown an interest in this area were it to have natural gas. The local leaders have made it clear these were desirable candidates and it is the best indication of what could be expected in the future.

In the Pipeline Draft EIS the BLM has returned to the public a seriously flawed and deficient document. There is the appearance of a double standard in play. The projections of Coos County and ECONorthwest that the availability of natural gas will stimulate beneficial economic activity (even though they can not say which industries will come) are treated as acceptable and reasonable. The projections of the responding public that such activity might also have negative environmental, economic, and social impacts are considered speculative and thus unacceptable since it is not known which industries will locate here.

In Appendix G, Questions and Concerns from the Public, are BLM answers to two comments which are most telling:

Comment 2 p.G14: "We strongly support construction of the pipeline. Please do all you can to further this project." The person registering the comment clearly regards the BLM role in the EIS as one to further and enable, not objectively evaluate, the Pipeline project. To which, the BLM says "Thank you for your support."

Comment 11 p.G16: "My family and I strongly support construction of the natural gas pipeline. The few noisy people...want nothing that will cost any taxes regardless of the

long-term benefits of any project. Please do all you can to further this project." Again, the commenting parties regard the BLM as an agency to advance the project. And to this the BLM again says "Thank you for your support."

One has to surmise that this is, indeed, how the BLM sees it role. It is the only reasonable explanation for a draft EIS that is rife with serious omissions, misrepresentations, and failures to perform according to federal regulations.

Peter Ryan
Peter Ryan

Christina Alexander
Christina Alexander

2

James Gomez
160 North Folsom St.
Coquille, OR 97423

March 25th 2002

Bob Gunther
Project Coordinator
Coos Bay District
Bureau of Land Management
1300 Airport Lane
North Bend, OR 97459

Re: Comment in response to draft Environmental Impact Statement (EIS) for proposed natural gas pipeline from Roseburg to Coos Bay, reference # 2800.

It is my understanding that while preparing an EIS it is necessary to address the Direct, the Indirect as well as the Cumulative effects of the proposed project. It is my belief that these items were not sufficiently addressed in this draft EIS.

Item: Chapter 1, Purpose of and Need For Action; Page 5, paragraph 2.

- Points out the fact that a natural gas pipeline would not necessarily bring new manufacturing facilities to the area, questioning the projects purpose.
- It avoids the most pertinent issue of the whole project, that being the impact of bringing new industry to the North Spit area and its effects on the Bay as well as the Estuary and surrounding areas.
- The potential effects on these areas cannot be separated from the direct impact of the pipelines construction itself. They would undoubtedly fall under indirect as well as cumulative impact due to the pipelines construction. An EIS prepared without taking these issues into consideration is without merit and therefore invalid.

Item: Chapter 3, Affected Environment; Page 18, Air Quality, paragraph 2.

Effects to final destination of pipeline not considered:

- Coos Bay as well as the adjoining estuary and surrounding land areas, particularly those down wind of any new industrial facilities, would be impacted both indirectly as well as cumulatively as a result of the construction of the proposed pipeline.

- Although it is not possible to evaluate precise impacts for unknown future industry, it is possible to obtain current air quality levels for this final destination area and to prepare projected impact levels for potential new industry to the area. Without this further inquiry into impacts created by the pipelines construction, the EIS is incomplete.

Item: Chapter 3, Affected Environment; Page 20, Water Quality.

Effects to final destination of pipeline not considered:

- Coos Bay and the adjoining estuary would be impacted both indirectly as well as cumulatively as a result of the construction of the proposed pipeline.
- Although it is not possible to evaluate precise impacts for unknown future industry, it is possible to obtain current water quality levels for this final destination area and to prepare projected impact levels for potential new industry to the area. Without this further inquiry into impacts created by the pipelines construction, the EIS is incomplete.

Page 28, Public Health and Safety

Effects to final destination of pipeline not considered:

- Coos Bay as well as the adjoining estuary and surrounding land areas, particularly those down wind of any new industrial facilities, would be impacted both indirectly as well as cumulatively as a result of the construction of the proposed pipeline. This matter has no other foreseeable conclusion except that of becoming a threat to both public health and safety.
- This issue has not been properly addressed. With the inevitable increase in levels of pollution created by proposed industrial activity in the final destination area. The end point habitat and its inhabitant's ability to absorb these increased toxicity levels needs to be ascertained, prior to any further consideration of a gas pipeline project, whose primary purpose is industrial development in an area already at risk.
- Coos County has one of the highest cancer rates in the state of Oregon. We need to examine why that is, before we undertake projects that will knowingly increase probable polluting elements responsible for such public health and safety issues.

(2)

Page 30, Land Uses, Recreation along the Proposed Action.

Effects to final destination of pipeline not considered:

- Coos Bay as well as the adjoining estuary and surrounding land areas, particularly those down wind of any new industrial facilities, would be impacted both indirectly as well as cumulatively as a result of the construction of the proposed pipeline.
- Again the extent of any study concerning the construction of the proposed gas pipeline cannot warrant validity without the inclusion of the results that will be created at the final destination area.

In summary I would propose that an EIS that truly undertook the entire scope of the effects associated with the proposed gas pipeline, (Direct, Indirect and Cumulative) be required.



james i. gomez