



Oregon

Theodore Kulongoski, Governor

Department of Environmental Quality

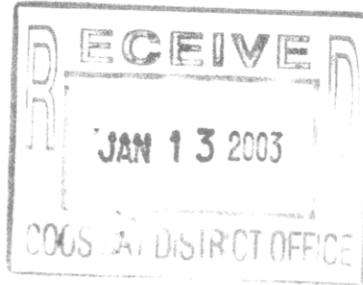
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January 13, 2003

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

RE: Coos County Natural Gas Pipeline FEIS

Dear Mr. Gunther,

Thank you for the opportunity to discuss this FEIS with you. The Department provides these comments regarding the FEIS for the Coos County Natural Gas Pipeline. These comments bridge three agency water quality programs including Point Sources Permitting and Compliance, 401 Water Quality Certification, and Non Point Source programs.

The project will include the crossing of 186 streams and 2 wetland areas. It is our understanding that these activities will be conducted under one or more Corps Nationwide Permits. Please be aware that Nationwide Permits contain Section 401 Water Quality Certification conditions which are part of the Permit. In order to comply with state water quality standards and beneficial uses you must adhere to those requirements.

These certification conditions outline measures that must be taken to protect water quality during fill and removal activities. Limited duration turbidity exceedances are allowed. If turbidity from any project exceeds 10% over background, project work must be stopped and best management practices implemented to alleviate these exceedances. Turbidity monitoring during instream work is a requirement.

Please note that any proposed project work requiring an individual 404 Fill and Removal permit also requires 401 Water Quality Certification.

The project proposal indicates that ground disturbing activities will exceed one acre and will require a National Pollutant Discharge Elimination System (NPDES) 1200-C Storm Water Construction Permit. The 1200-C permit basically requires the following:

- No discharge of significant amounts of sediment to surface waters.
- Preparation and implementation of an Erosion and Sediment Control Plan to prevent such discharges. A copy of the plan needs to be submitted to DEQ at least 30 days before starting work. The plan must be approved by DEQ prior to beginning any construction activities. (For construction activities disturbing 20 or more acres, the plan must be prepared and stamped by an Oregon Registered Professional Engineer, Oregon Registered Landscape Architect, or Certified Professional in Erosion and Sediment Control. It appears that this project will likely result in the disturbance of over 20 acres.)
- Maintenance of erosion and sediment controls, clean up of deposits of sediment that leave site, and proper storage, handling, and disposal of hazardous materials.
- Compliance with water quality standards in Oregon Administrative Rule (OAR) 340-041 and any Total Maximum Daily Loads established for specific basins. For example no discharge can cause more than a 10% increase in in-stream turbidity from background.



- Visual inspection of erosion and sediment control measures.

You may obtain a copy of the permit from DEQ or a copy of the NPDES 1022-C permit may be obtained at:

<http://www.deq.state.or.us/wq/wqpewrmits/permitdocs.htm>

Potential disturbances in riparian areas are discussed in several areas of the document. There appears to be some contradictory statements regarding removal of vegetation. See section H-6 at top of page; it states that "where trees or vegetative root structures are removed tree plantings in the next dormant season may be appropriate". Throughout the rest of the document however it is made clear that no riparian vegetation will be removed.

Section A-11 (Sideslope Construction) it indicates that as much as 60 feet in width will be needed for equipment. This information provides little detail regarding potential impacts to riparian areas at these sites.

Removal of riparian vegetation should be limited to that deemed essential to the implementation of the project. There needs to be clarification regarding the mechanisms that will guide decisions regarding riparian vegetation removal and proposed mitigation measures.

The EIS describes several areas as steep, nearly vertical, rock cliffs that are heavily eroded and have landslide deposits present. This portion of the project area runs very close the East Fork of the Coquille. If management related landslides and/or mass wasting events occur. contingency measures should be in place to transport soils to storage areas that will prevent further movement into waterbodies. Side casting of soils into waters of the state is strongly discouraged and not allowed under state water quality rules. Site conditions should be evaluated on a regular basis.

Appendix E identifies several water quality parameters as "At Risk" and/or "Not Properly Functioning". These are indications that the current function of this system is rather fragile and susceptible to adverse effects that might result from disturbance based activities. What may appear to be insignificant effects at any given work site may result in adverse cumulative effects on a watershed scale. Turbidity and sediment inputs may have adverse effects on fishery resource as well as channel stability. Disturbances in riparian vegetation may have adverse effects on stream heating and temperature. Conscientious project management will be required to maintain this environmental baseline.

Please feel free to contact me if I can provide additional information during this EIS process or during project implementation.

Sincerely,



Pamela Blake
 South Coast Team coordinator
 Department of Environmental Quality
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