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COOS BAY DIST OFFICE  
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RE: Comments on the Final EIS - Natural Gas Pipeline

In the response #33 (G-2-14) to our earlier comments on the pipeline, we are unable to find an adequate response concerning land uses and the Coos Bay Estuary. We find no evidence that the Coos Bay Estuary Management Plan (CBEMP) was acknowledged or given any consideration throughout the document. How can the pipeline can be laid under the Estuary to provide natural gas to existing industrial lands and uses on the north shore of the Coos Bay Estuary, which contribute considerable pollution to the Estuary, without considering this impact in an FEIS? Most of the rationale for the pipeline was to encourage development of more industrial sites which will create more pollution in the Estuary. To state that such land uses will create no impact is false.

The Land Uses-Environmental Consequences on pages 75-77 state no impact. However, there is no evidence that BLM looked at the County's Coos Bay Estuary Management Plan, and we believe the EIS process requires consideration of both state and local laws. The CBEMP requires resource impact assessments and resource capability consistency findings. The FEIS does not address these requirements, and has made no legitimate findings concerning these requirements.

Mr. Ron Sadler quotes from a US Department of Interior report which states:

“Coos Bay is truly an ecosystem and one modification or activity could start a chain reaction which could affect the whole, resulting in severe damage to certain natural resources.”  
(USDI, "Natural Resources, Ecological Aspects, Uses and

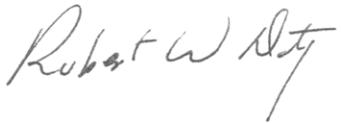
Guidelines for the Management of Coos Bay”, Secretary of Interior Field Representative L. B. Day, June, 1971, page 128).

According to Mr. Sadler, the report identifies “the need for an integrated and comprehensive plan for the protection and development of Coos Bay. It cautions that, without such an integrated and comprehensive plan, irreparable and lasting damage can occur.”

It is our understanding that the FEIS was to anticipate indirect and potential cumulative impacts of future industrial uses in light of current existing evidence, and to consider ways that cumulative impacts can be mitigated in the future. The FEIS fails to perform an analysis which responds to this requirement of the law.

Finally, the BLM began the EIS process considering one group of pipeline routes, but changed the routes prior to the final EIS. Did that action comply with NEPA requirements?

Robert W. Doty



*Carol N. Doty*  
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