

COQUILLE INDIAN TRIBE

P.O. Box 783 • 3050 Tremont • North Bend, OR 97459

Telephone 541-756-0904 • FAX 541-756-0847

COOS BAY DIST OFFICE
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January 12, 2003

Ms. Sue E. Richardson, District Manager
BLM Coos Bay District
1300 Airport Lane
North Bend, OR 97459

Re: Coos County Natural Gas Pipeline Final EIS; cultural resource considerations

Dear Ms. Richardson:

Thank you for the opportunity to comment on the Coos County Natural Gas Pipeline Final EIS. I truly appreciate the work of yourself and the Coos Bay District staff to facilitate the environmental review of this project; particularly when such a large portion of the project as proposed does not directly involve BLM lands or jurisdictions, and depending on your decision, may not in fact involve any BLM lands in its final design and construction. In that light, I direct these comments to you and BLM as lead agency, while recognizing that several of my concerns will ultimately have to be addressed and mitigated by other parties.

First of all, I remain very concerned about the potential of this project to impact archeological resources in Coos County, particularly within those segments of the route between the communities of Sitkum and Sumner. Although the EIS reports that virtually all the route has experienced a cultural resource survey of some sort, with few exceptions all those surveys have been surface examinations- leaving open to further question whether- and what- cultural or archeological resources might be present subsurface within the proposed project corridor.

My concern is driven primarily by two considerations: 1) the success and accuracy of pedestrian/surface cultural resource surveys- and the assumptions derived from them- is hugely dependent on the time of year and thoroughness of the examination (which I believe was extremely limited by project scheduling and budget constraints); and 2) the project will excavate to a depth of three feet, which- whether the pipeline is placed within existing ROW's and/or previously disturbed areas or not- is significantly deep enough to contact native and undisturbed soils.

What is found on the surface is absolutely no indicator of what might lie below. Consequently I dispute that those locations noted in the EIS are the only locations that should be monitored for their archeological potential.

Secondly, I remain concerned that information about archeological sites or other important cultural resources that might have been provided by either of the two federally recognized tribes in Coos County has been overlooked. Here again, my concern is prompted by two considerations: 1) not all archeological sites are recorded at the State Historic Preservation Office (i.e. tribal oral traditions and history, information that private land-owners choose not to make public, tribal

research not sufficiently completed to submit to SHPO); and 2) particularly in built environments (the community of Fairview as example), tribes and native people have long-standing social and cultural relationships with these places that allow them to "see" and to recognize those landscapes as they existed and were used long before modern settlement and development activities shaped what we see today.

In short, and to again use Fairview as example, I have seen no report generated by this EIS or any other project that accurately and completely displays all the known or reported sites within the project corridor as it is proposed to be located in the Fairview area. Although some new information was generated as a result of the surveys that were done in Fairview and elsewhere, it is my firm belief that not all available information, insights, or experiences was acquired or incorporated from the two tribes in Coos County that should be taken into account in considering the presence of or potential impacts to archeological and cultural resources along the pipeline route.

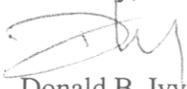
My third point is this: although they are outside the scope of this EIS, the proposed "lateral lines" also have cultural resource considerations- for much the same reasons and concerns as above. Although there may not be a federal presence in the funding, siting, or construction of those laterals, the need to accurately and appropriately address the potential for impacts to cultural and archeological resources along the lateral routes is not diminished.

The final points I wish to make about archeological and cultural resources concern the future involvement of the two tribes in this project: 1) representatives of each of the two tribes in Coos County should be involved in the final design and location of the pipeline and its laterals, regardless of land ownerships or jurisdictions; 2) both tribes should be involved to determine where and how project monitoring should occur along the entire project corridor in Coos County; 3) both tribes should be considered as the most qualified and competent consultants to anticipate or mitigate the cultural resource elements of the pipeline project as it moves forward.

In closing, let me say that my comments are in no way intended to disparage or discredit the work of those who were responsible to develop the cultural resource element of the EIS. Both B.I.S. and HRA are competent and qualified as firms and as individuals to have undertaken this task; they did what they could with limited resources and time to get it done. Neither do I purport that "tribal input" is the be-all and end-all of information and authority when it comes to cultural resources inventories and assessments. My intent has been only to reiterate concerns that I (and others) have already raised, and expand the audience to which those concerns are directly expressed.

I again express my thanks to you and your staff for the efforts of BLM Coos Bay District to assist the Board of Commissioners and citizenry of Coos County to accomplish this important and beneficial project.

Sincerely,



Donald B. Ivy
Cultural Resources Program Coordinator

- C: Coquille Tribal Council
- Coos County Board of Commissioners
- Confederated Tribes of Coos, Lower Umpqua, & Siuslaw Indians