



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).

Effected 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

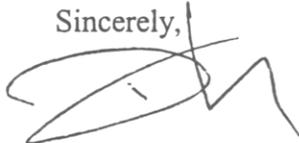
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informants, coupled with the oral histories of the local tribes, suggest the very strong potential for much of the Fairview valley to be one very large and extensive archeological site. The B.I.S. report also does not address the pipeline laterals, 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. Ivy
Cultural Resources Program Coordinator

C: Tribal Council
Culture Committee
Confederated Coos Tribes