

IND315

FERC Docket No. CP13-483-000
Public Comment on Jordan Cove Energy Project Draft EIS by Barbara Gimlin
February 12, 2015

TOPIC	REQUESTED ACTIONS INCLUDING COMMENTS/QUESTIONS
Inconsistencies in Project Information	<p>The information and permit applications submitted to local, state and federal agencies, including the project information included in the FERC Draft Environmental Impact Statement (EIS), is full of holes, has substantial inconsistencies between what is presented to various agencies, and there are significant lapses in portraying what the full scope of work for the project will entail and how potential adverse effects will be addressed. By not having a complete and consistent scope of work to evaluate, FERC is unable to fully conduct the proper review and analysis needed for the various resources affected. The project fails to address the affected human and natural environment and does not comply with the National Environmental Policy Act.</p>
Soil Contamination at the LNG Terminal Facility Site	<p>In the Draft EIS, the Jordan Cove Energy Project (JCEP) plans to excavate and transport approximately 2.3 million cubic yards of the upland soils from the terminal site (known as Ingram Yard) for use as fill for the shoreline South Dunes Power Plant (SDPP) site. This does not include additional sites along the forested shoreline where other contaminants have been exposed, and other potential sites within the project footprint on the North Spit of Coos Bay.</p>
	<p>The Draft EIS states 20-30 feet of fill will be used at the SDPP site. However, in the JCEP's application to the Oregon Department of Energy (DOE) for the Energy Facility Siting Council, it states 40-46 feet of fill will be used and it will go right up to the shoreline along Jordan Cove. Regardless of the amount of fill, due to the fact that it will be excavated from a site known to be a mill dumpsite with bioaccumulating toxins, there should be a clear plan in place for how the extensive contamination will be managed, handled, and disposed of. In addition to mill waste, it is common local knowledge that Ingram Yard was a dumping site used by other entities that found it a convenient place to dump waste.</p>
	<p>The contamination at the JCEP terminal site occurs well outside of the range of where the previous testing was conducted. Much more testing is needed at the overall site to fully understand the extent. Contaminated soil was exposed virtually everywhere excavation occurred in Ingram Yard and along the shoreline during the Newit exploratory test program conducted for the project in the spring of 2014. While the types of contaminants are somewhat understood, their extent is not.</p>
	<p>It is not acceptable to use contaminated soils as fill anywhere within the project boundaries when the potential for stormwater runoff and/or being washed into the bay from a tsunami presents a very real concern to the marine and natural environment of Coos Bay. All contaminated soil needs to be hauled offsite, with Best Management Practices (BMPs) to ensure construction equipment and vehicles handling it do not result in the further spread of these contaminants into the bay.</p>

IND315 Barbara Gimlin

- IND315-1 The DEIS is a science-based document that summarizes years of studies and considers the extensive research on fish, riparian habitat, streams and water quality. Effects are discussed in chapter 4, e.g., section 4.9 discusses social and economic effects. The DEIS complies with NEPA. Additional information will be provided in the FEIS.
- IND315-2 Comment noted.
- IND315-3 Fill materials would be derived both from the marine slip dredging and the LNG terminal site. Dredging would include screening for potential contaminants as described in the EIS. Contamination above screening levels was not discovered at the LNG terminal site/former Ingram Yard (see page 4-301 of the DEIS), and these materials do not require clean-up. Therefore, these materials are acceptable for excavation and fill materials for the Project. On February 3, 2015, Jordan Cove filed the results of its 2014 geotechnical testing program at the Ingram Yard. We have analyzed those results in section 4.3 of the FEIS.
- IND315-4 See the supplemental information submitted by Jordan Cove on February 3, 2015 which is comprised of a February 2, 2015 letter to Jordan Cove from its contractor, SHN Consulting Engineers & Geologists, Inc. (SHN), and twelve attachments. The letter summarizes the chronology of activities for soils testing at the former Ingram Yard, in particular as related to contaminated soils and a buried septic tank. This information is described in section 4.3.1.3 (Soil Limitations) in the FEIS. On February 3, 2015, Jordan Cove also filed results of its 2014 geotechnical testing program at the Ingram Yard. We have analyzed those results in section 4.2.1.4 (Geotechnical Testing) of the FEIS. Additional contamination sampling would be conducted by the ODEQ that has no relationship with the Jordan Cove and Pacific Connector Project.
- IND315-5 See the response to the comment IND315-3 and IND315-4.

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<p>Unanticipated Hazardous Waste Discovery Plan and Need for Third Party Monitoring</p>	<p>By not clearly and adequately analyzing the contaminated soils throughout the JCEP terminal site in the Draft EIS, the affected environment and potential environmental consequences of the project are not being addressed. Therefore, cumulative effects and conclusions drawn from the misrepresentation of the site are inadequate. The Unanticipated Hazardous Waste Discovery Plan developed by the JCEP sounds good, but I can tell you from firsthand experience as the acting Environmental Inspector for project's \$1.5 million exploratory test program conducted at the LNG terminal site in the spring of 2014 that this plan was not followed in the least. Instead, I was ordered to not do my job, to not follow the plan, to not contact the Oregon Department of Environmental Quality, and to not delay the ongoing construction activities being conducted at the time. It is essential that third-party environmental monitors are in place to ensure this doesn't happen again on a much larger scale.</p>	IND315-6
<p>Stormwater Management</p>	<p>The only stormwater management plan referred to in the Draft EIS is the one included in Resource Report 2, and it is far from adequate. A stormwater management plan needs to be individually developed for the site which clearly takes into account the contaminants at the site and ensures they are not transported to the shoreline SDPP site or anywhere else inside the project footprint along the shoreline of Coos Bay. As stated in the Draft EIS, stormwater currently will be transported through a series of ditches and swales for release in the slip and access channel created for the project. Treatment is briefly mentioned as being included as needed, but there is no clear, site-specific plan included in the DEIS and there should be.</p>	IND315-7
	<p>For the Oregon DOE site application with EFSC, a Conceptual Stormwater Management Plan for the JCEP (Document No. 142488-0000-DS0300) dated October 24, 2014, was included. It did not bring up or address the ongoing contamination issues at the site and the BMPs it proposes to not begin to properly address the real and relevant concerns. If anything, it is alarming as it states placement of what they refer to as "sand fill" throughout the plan (from Ingram Yard) will create approximately 2,512,300 square feet of exposed slopes along the SDPP shoreline. It also states monitoring and testing of the stormwater outfalls will be developed as the stormwater design is finalized. This is not good enough. If this issue is not fully evaluated and a stormwater management plan is approved by FERC prior to issuing a Record of Decision for the Final EIS, there is no guarantee an adequate plan will be in place to address the ongoing issues.</p>	IND315-8
	<p>In addition, the proposed scope of work states the work will be conducted during the Oregon Department of Fish and Wildlife's work window for Coos Bay, which occurs during the months with the highest monthly averages of precipitation (November, December and January). This makes it imperative that extensive BMPs and policies are in place to ensure potential contaminants exposed during excavation at the site are not released into the bay via stormwater.</p>	IND315-9
		IND315-10

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- IND315-6 See the response to the comment IND315-3 and IND315-4.
- IND315-7 Comment noted.
- IND315-8 The purpose of a storm water management plan is not to deal with contaminated soil, it ensures proper management of storm water to prevent erosion and sedimentation into waterbodies and wetlands. The Erosion and Sediment Control Plan (i.e., Oregon Construction Storm Water Pollution Prevention Plan) is approved by ODEQ and section 4.6.3 addresses controls to prevent contamination. As stated in the DEIS section 4.4.1.1, the storm water drainage system would treat any storm water that has the potential for contamination by oil or grease. It would be pumped or flow into the oily water collection sumps to the oily water separator packages before discharging to the industrial wastewater pipeline. Jordan Cove would apply for a new NPDES permit for this discharge, and no untreated contaminated storm water would be allowed to enter federal or state waters. JCEP Resource Report 7 and the Soils section of the ADEIS discusses contaminated soils. ODEQ recognized that the residual contamination as the site is not present at levels that pose an unacceptable risk to human health, safety, welfare and the environment. ODEQ has recommended a "No Further Action" determination for the portion of the non-jurisdictional South Dunes Power Plant (former Weyerhaeuser linerboard mill) site as well as the area known as Ingram Yards. Soil samples from the slip area and sediment samples within Coos Bay adjacent to the slip and in the access channel were collected and analyzed and determined to be suitable for unconfined aquatic disposal. If necessary, JCEP will conduct any additional testing required by the regulatory permitting authorities for soils with in the slip area. The JPA included Appendix L Contaminated Substances Discovery Plan (which was Appendix E in the POD) addressing the prevention of further contamination in the event of an unanticipated discovery of contamination soil, water or groundwater during construction of the PCGP Project (not necessarily the LNG Terminal).
- IND315-9 As the comment states, Jordan Cove filed a conceptual plan. A final storm water management plan, approved by FERC and the ODEQ will be required prior to construction. Note that FERC does not issue a record of decision. The Commission will issue a Public Order. Its decision will consider the FEIS and other analyses, see section 1.3.
- IND315-10 Comment noted.

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	<p>In addition to ensuring ANY potential site contaminants are properly managed and disposed of, a monitoring and testing program needs to be clearly spelled out in the Draft EIS in order for FERC to fully review and analyze the soil contamination issue and ensure the potential effects to the human and natural environment are minimized and mitigated.</p>	IND315-11
<p>Intertidal Flats Mitigation Proposed for Kentuck Slough</p>	<p>The estuarine intertidal flats mitigation proposed for Kentuck Slough by the JCEP has not undergone the serious environmental and hydrologic evaluation needed to ensure the mitigation will not result in contamination of the Coos Bay estuary, flooding of adjacent and upstream property owners, and a potential mosquito infestation that would affect area residents. Much more input is needed from hydrologists, engineers, natural resources scientists, and planners to fully understand and design a plan for the site that will address current and future site-specific conditions on the ground, including upstream of the site. The inconsistencies in the plans brought forward, together with the lack of appropriate studies and associated documentation, is alarming. As it stands, there is a significant potential for substantial adverse effects from the mitigation proposed at Kentuck. [See my separate public comment submitted to FERC, No. 20150212-5018.]</p>	IND315-12
<p>Tsunami hazards.</p>	<p>In a 13-year study completed by Oregon State University in 2012 [published online by the U.S. Geological Survey; Professional Paper 1661-F], the study concluded that there is a 40 percent chance of a major earthquake in the Coos Bay region during the next 50 years due to its location along the Cascadia Subduction Zone. The study determined such an earthquake could approach the intensity of the Tohoku quake that devastated Japan in March of 2011. Why was this extensive study not discussed or considered in the risk evaluation for the JCEP? In addition, a multi-state mitigation project of the National Tsunami Hazard Mitigation Program (NTHMP) published Seven Principles for Planning and Designing for Tsunami Hazards in March 2001. Participants includes the National Oceanic and Atmospheric Administration (NOAA), U.S. Geological Survey, Federal Emergency Management Agency, National Science Foundation and the states of Alaska, California, Hawaii, Oregon, and Washington. Funding for this project was provided by NOAA. Why was this valuable study not also used or discussed in determining the tsunami risks for the JCEP? FERC needs to review the findings of these two well researched reports in their decision-making process.</p>	IND315-13
<p>Poorly written Draft EIS.</p>	<p>The Plain Writing Act of 2010 (the Act) [Public Law 111-274], which the President signed into law on October 13, 2010, calls for writing that is clear, concise, well-organized, and consistent with other best practices appropriate to the subject or field and intended audience. Such writing avoids jargon, redundancy, ambiguity, and obscurity. The act is dedicated to the idea that citizens deserve clear communications from the government. That has not happened in the case of the Draft EIS presented by FERC which consists of volumes of information (over 5000 pages) that has been confusing and difficult to decipher by the public.</p>	IND315-14

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- IND315-11 Comment noted.
- IND315-12 This plan is discussed in section 4.4.1.3 of the DEIS. That section states that the current Compensatory Wetland Mitigation Plan does not provide sufficient information and is not approved by COE and ODSL. See the recommendation on page 4-410 that Jordan Cove consult with the COE, ODEQ and ODSL and other agencies on their mitigation plan for wetlands.
- IND315-13 The updated GRI site-specific probabilistic ground motion study (results provided in section 4.1.2.4 of the EIS) did consider the latest USGS fault studies including those from OSU. Furthermore, the GRI ground motion levels were independently verified by comparing with those developed by the USGS in their latest published national hazard ground maps.
- IND315-14 The tsunami site hazard study performed by CHE did follow a very similar approach currently used by NOAA to develop tsunami design maps for the National Tsunami Hazard Mitigation Program which will soon be published. FERC was able to obtain preliminary versions of the design maps and the tsunami inundation levels predicted by NOAA were very similar to those being predicted by CHE at the Jordan Cove site.
- IND315-15 This is a complex project. The DEIS considers the LNG facility, a 230-mile natural gas pipeline, and amendments to BLM and National Forest management plans. These are connected actions, therefore they are considered in one EIS rather than three shorter EISs. The EIS is nearly 1,350 pages. There are also appendices. We are sorry to learn that you found it too complicated.

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IND316

IND316 Kelly Flenniken, Grand Junction, CO

IND316-1 Comment noted.

Kelly Flenniken, Grand Junction, CO.
Dear Secretary Bose:

The Grand Junction Economic Partnership (GJEP) is pleased to provide our unconditional support for the Jordan Cove Liquefaction and Pacific Connector Pipeline Projects. A west coast Liquefied Natural Gas (LNG) export facility will provide access to international markets that in turn allows for increased export potential for natural gas suppliers in Rocky Mountain states. We understand that the Department of Energy has conditionally approved permits for Jordan Cove, we would encourage an expedited approval of this EIS.

IND316-1

GJEP is a nonprofit economic development organization that represents the entirety of Mesa County, Colorado. The mission of the organization is to enhance the economic vitality of our community creating a strong, diverse economy and an improved quality of life.

One of GJEP's target industries for growth is the energy industry. In an effort to support this industry we try to look at it holistically; what are workforce needs, what vendors and suppliers are necessary, what assets or actions could prove beneficial? We believe the markets that could be opened through this project would create the need for additional production, which would lead to the creation, or in some cases, retention of high-paying primary jobs.

As our region slowly recovers from the recession, it is important to look toward projects that facilitate growth. We believe the Jordan Cove project not only facilitates growth and stability in our region, but in regions upstream as well. We are excited to support Jordan Cove in their pursuit.

Should you have any questions, or wish to discuss this matter further, please do not hesitate to contact me directly.

Best,

Kelly Flenniken
Executive Director

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IND317

IND317 Duane Doyle, Jr., Portland, OR

IND317-1 Comment noted.

Duane Doyle, Jr., Portland, OR.
As Regional General Manager of Peterson Cat, I strongly support the
Jordan Cove Energy Project and Pacific Connector Gas Pipeline because
they will greatly boost the local economy as well as the entire region of
southern Oregon. These projects will provide jobs and tax revenue to fund
important things like education for future generations. In addition, they
will open up opportunities for future business investment which will
again benefit the community and its families with good-paying jobs. Most
of all, they will help ensure southern Oregon is an attractive place to
live and raise a family.

IND317-1

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IND318

Wm Rohrer, North Bend, OR.

I am a long-time resident of North Bend OR, and I DO NOT support the proposed pipeline and terminal for the Jordan Cove project. Please see the assessment of DOGAMI regarding a potential imminent Cascadian event and tsunami for the proposed JC project that would be affected by a earthquake and tsunami for Zone 1: Coast - Tsunami Zone set forth below:

IND318-1

The Oregon Resilience Plan -Information and Communications - February 2013 Page 190

"Zone 1: Coast-Tsunami Zone

All communications and information technology infrastructure within the tsunami inundation zone will sustain major damage or be destroyed. The ability to operate any equipment that survives both the earthquake and the tsunami will depend on the availability of electrical power and whether crews are able to access the equipment in order to perform maintenance and repairs.

- Buildings. All buildings in the inundation area will be destroyed or heavily damaged. o Few buildings are built to current seismic code and even fewer are built to the critical facility level (which is designed to increase the chances that the structure will be usable after the earthquake).
- o Those structures not destroyed by the earthquake will be inundated by the tsunami waves.

- Equipment. Equipment in buildings.
- o Existing standards for communications and information technology do not appear to address the protection of equipment from damage during large seismic events.
- o Improperly secured equipment can be damaged or destroyed even if the structure that houses it survives both the seismic shaking and the tsunami waves.

- Towers. Antenna towers in the inundation zone have the same probabilities of being damaged and destroyed as the buildings.
- o A number of the towers and antennas are located on existing buildings and will be only as reliable as the buildings they are on.
- o Even if towers are free standing and reinforced to withstand the shaking and the tsunami waves, the equipment on the towers must be positioned above the inundation height of the tsunami wave and properly secured to avoid damage from the shaking.
- o Free standing towers without properly constructed foundations could fail due to liquefaction.

- Aerial Cables. Overhead lines that survive the scenario earthquake will be destroyed by the tsunami wave (with the possible exception of those on the outer most edges of the inundation area).
- o Cross arms, connectors, and insulators that are designed to break away in high winds to reduce the potential damage to the utility poles could also give way during the seismic event.
- o Liquefaction can cause utility poles to lean or topple.

IND318 William Rohrer, North Bend, OR

IND318-1 Comment noted. Jordan Cove would design and construct its facilities in a manner that takes geological conditions, such as an earthquake, into consideration.

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IND318-2 See the response IND1-4.

The Oregon Resilience Plan -Information and Communications - February 2013 191
o Debris in the tsunami inundation waves will have significant impacts on utility poles and lines.
• Underground Lines. Depending on the amount of liquefaction and shearing forces, the earthquake could be just as devastating to the underground utilities as to the overhead lines.
While the tsunami wave may have little direct impact on buried lines, the failure of utility vaults, salt water inundation of underground conduits, and loss of terminal posts will be just as disruptive as the physical loss of the lines.
o Breaks in the underground lines are hard to locate unless there is some obviously related disturbance of the ground or activity in the vicinity of the break."

The final EIS must, in detail, properly and precisely address all of the issues stated above and how this applicant could possibly estimate how it can predict the adequacy of its preparation for such an event(s).

IND318-2

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IND319

Susan Bizeau, Talent, OR.
My concerns Regarding CP13-483-000 and CP13-492-000

In the Klamath Drainage the Lost river, home of critical sucker fish habitat would be potentially affected. Also crossed would be Spencer and Clover Creeks, and the Klamath River below Keno. These creeks are critical spawning habitat for Klamath River Trout. This is a world class trout fishery.

IND319-1

In the Rogue River Drainage, the North and South Forks of Little Butte Creek, and parts of Trail Creek, all critical spawning habitat, and the Rogue River itself near Shady Cove will be crossed. As you know the Rogue is world renowned for its steelhead and salmon fishing.

Other rivers of note, with many tributaries involved, include the S. Fork of the Umpqua just downstream of Tiller, and many forks of the Coquille River, and the Coos River will be crossed.

The pipe crossing will involve moving tons of stream bottom, digging a trench, and the building of coffer dams. Much of this done in steep backcountry, in areas subject to high water flows at times. The potential for significant sedimentation is huge. There will also be a clear cut 95' wide along the path of the pipeline. This, at stream crossing sites, will lead to increased thermal pollution and stress on these waterbodies.

IND319-2

To cross the Rogue River upstream of Shady cove, there will be a drilling project through bedrock under the river, that has the potential to fracture the bedrock causing what is called a "frack out" which could lead to the dumping of tonnes of a fine sediment called bentonite, that could potentially smother spawning gravel beds for miles downstream.

IND319-3

At the LNG terminal site in Coos Bay massive dredging of the bay to make it a deepwater terminal will occur. Wetlands will be damaged. Wave action from huge tankers will disrupt and cause erosion of bay side and oceanside shoreline in the Coos Bay area.

IND319-4

Uncontrolled wildfire is a real risk that could result from an LNG rupture in Jackson or Josephine County. We are reminded often that a large earthquake is overdue in Jackson County. This project will involve a 230-mile gas pipeline right through Jackson County, crossing 400 waterways which would sustain severe damage long-term should an earthquake come near this pipeline. Gas pipes leak and break, water gets contaminated; forests burn.

IND319-5

IND319-6

This is a local air and water quality issue, in addition to the larger global issue of facilitating more fossil fuel infrastructure. The benefits locally of this project just can't begin to come anywhere near the risks to our rivers and forests and humans depending on them in the generations ahead.

IND319-7

Thank you for your concern and consideration to the long term environmental and economic risks of this project to Oregon citizens and the world at large.

IND319 Susan Bizeau, Talent, OR

- IND319-1 Effects on the Lost River Sucker and other fish are discussed in section 4.6.2.3. Pacific Connector would use an HDD to cross under the Rogue River, avoiding impacts on the fishery associated with that river.
- IND319-2 Sedimentation is discussed in sections 4.4.2.2 and 4.6.2.3. On stream temperatures, see response to IND2-9.
- IND319-3 The risks of a "frack out" and the potential adverse effects, as well as plans for crossing the river if the HDD fails are discussed in section 4.4.2.2.
- IND319-4 Information on dredging and disposal of dredged material is discussed in section 2.1.1.12. Wetland impacts and mitigation associated with the LNG terminal are discussed in section 4.4.3.1.
- IND319-5 LNG would not be transported across either county. The pipeline would transport natural gas in vapor state from Malin to Coos Bay where it would be converted into LNG.
- IND319-6 Seismic hazards for the pipeline are discussed in section 4.2.2.2. Impacts on waterbodies are addressed in section 4.4. As indicated in section 4.13, FERC-regulated natural gas pipelines rarely break. In the unlikely event of a break, natural gas could not contaminate water because it is lighter than air and would rise. Forest fires are discussed in section 4.5.1.2.
- IND319-7 Air quality is discussed in section 4.12. United States energy policy is developed by the President and Congress.

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IND320

IND320 Janice Williams, North Bend, OR

Janice C. Williams, North Bend, OR.

The following are my comments on the DEIS for Docket #CP13-483-000 & Docket #CP13-492-000, and I thank you for taking them.

Page 4-247 mentioned "lessons learned" from the Japanese Tohoku earthquake. The biggest lesson learned from that disaster was that all the engineering and thought put into safety measures were not enough. So when page 4-250 says "We conclude that the site-specific tsunami studies, coupled with Jordan Cove's proposed mitigation measures, indicate that the site is not unsuitable due to tsunami hazards.", I have to say that is not a reasonable or realistic conclusion.

The DEIS representation of the true risk time-table is definitely incomplete. Dr. Chris Goldfinger, a structural geologist, is mentioned on page 4-245 in connection with a 2012 study. His 13 years of work tells us that the Coos Bay area is overdue for an earthquake/tsunami by 75 years. It also tells us that every year we do not have an event, the closer we are to it. The current yearly risk is at 40%, and it will go up considerably during the lifetime of the terminal and pipeline. Here are further quotes from an OSU press release dated 8/1/12:

Quote—"The Goldfinger-led study took four years to complete and is based on 13 years of research. At 184 pages, it is the most comprehensive overview ever written of the Cascadia Subduction Zone, a region off the Northwest coast where the Juan de Fuca tectonic plate is being subducted beneath the continent. Once thought to be a continuous fault line, Cascadia is now known to be at least partially segmented."

"But major earthquakes tend to strike more frequently along the southern end - every 240 years or so - and it has been longer than that since it last happened," Goldfinger added. "The probability for an earthquake on the southern part of the fault is more than double that of the northern end."

The clock is ticking on when a major earthquake will next strike, said Jay Patton, an OSU doctoral student who is a co-author on the study. "By the year 2060, if we have not had an earthquake, we will have exceeded 85 percent of all the known intervals of earthquake recurrence in 10,000 years," Patton said. "The interval between earthquakes ranges from a few decades to thousands of years. But we already have exceeded about three-fourths of them."—end quote of the OSU press release. This information should be part of the DEIS as should the following from Dr. Goldfinger, which is a from an article posted June 26, 2014 on Oregon Live (online publication of The Oregonian): "From my prospective, and the probabilities, I would certainly have reservations about building one of these terminals down there." His colleague, Dr. Anne Trehu, whose disciplines are geology and geophysics, said in the same article: "I would say every one of us would be reluctant to suggest a liquefied natural gas terminal on the coast here." These are fully reasoned conclusions based on the most up to date and comprehensive study of CSZ, and they should be part of the final EIS.

IND320-1 We disagree. Jordan Cove would be required to design and construct its facilities to satisfy stringent design standards and codes that provide design requirements for geological conditions, including earthquakes and tsunamis. These latest design standards and codes have been developed with the goal of preventing the same problems observed during the Tohoku earthquake. We are of the opinion that a facility design that meets these codes and standards would provide sufficient protection. See section 4.2.1.3 of the EIS.

IND320-1

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Secondly, when it comes to LNG ships traversing Coos Bay or docked at the terminal, I would like to know what would contingent plans be in case the CSZ rupture causes the water to recede. This is referred to as drawback, and it is reasonable to expect that to happen. How will this effect figure into the plans to use tugs to stabilize or control LNG ships in the berth? How will it affect ships that may be coming or going from the bay? This part of fluid dynamics should be addressed thoroughly in the EIS.

IND320-1
cont.

My third set of comments begin with the fact that gas-plants are inherently dangerous, and this was demonstrated recently in Plymouth, WA at a Williams Co. LNG facility. A tank rupture necessitated an evacuation. As you well know, millions of trips are taken by people traversing Highway 101 every year. They will be driving directly over the pipeline, not that far from the terminal, and very close to the power plant. Should a closure happen this will shut down commerce, cripple emergency services, and cause enormous inconvenience to residents and travelers. The Washington evacuation only affected hundreds compared to thousands in our community, as well as, the loss of the use of one of Oregon's busiest highways. That highway is our lifeline. The expense and gravity of this very real possibility should be dealt with in the EIS.

IND320-2

I will have a view of the power plant from my front yard. I will be breathing the air- pollution every day. Recent articles in our local paper and the Oregonian have revealed that this is the second most air-polluting project in all of Oregon, if it is built as proposed. I think, that is the fourth and final thing I would like to see in the EIS. I want the public and those who make the decisions to have the full truth about what granting a permit to JCEP/PCGP means to me, Oregon, and the fantastic people that visit this wonderful place to enjoy our clean and refreshing sea-air.

IND320-3

Thank you for your time and consideration.

IND320-2 Section 4.13 discusses safety.

IND320-3 Emissions are discussed in section 4.12.1.1. As stated, for all pollutants at the points of highest concentration are well below the national ambient air quality standards.

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IND321

IND321 Michele R. Hampton, North Bend, OR

IND321-1 Comment noted.

Michele R Hampton, North Bend, OR.
I have read the draft EIS that FERC has put together on the Jordan Cove Energy Project, as well as sat in on several informational meetings, and I agree with FERC's findings. I am confident that FERC has looked at every aspect of this project and analyzed any and all potential issues that may come up regarding a construction project of this size and type as well as post construction.

I would ask that FERC revisit the alternate Blue Ridge Route for the pipeline as this seems to be less of an impact to private landowners. Although I believe that both pipeline options are viable, minimizing the impact on private parties seems like the better choice.

I have studied the security and public safety processes regarding other LNG projects around the world and I am confident that proper procedures can be put in place to minimize risks to the community in the event of a natural disaster. This has been demonstrated in other LNG facilities.

I ask that you move forward with the permitting process so that concerned citizens of Coos County and other counties impacted can see for themselves the positive economic results this project will bring.

IND321-1

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IND322

IND322 Michele R. Hampton, North Bend, OR

IND322-1 Comment noted. See the analysis in section 3.4.2.2.

Michele R Hampton, North Bend, OR.
I have read the Draft EIS and agree with FERC's findings on the project.
I have also sat in on multiple informational meetings about this project.
I am confident that, by following the existing rules & regulations put in
place by City, County, State and Federal governments our real estate and
individuals will see minimal negative impacts. I believe that between
Jordan Cove and the regulatory entities involved, not to mention the
multitude of civic employees, engineers, ship pilots, etc., that every
safety and security measure has been reviewed. I am also confident that
every environmental impact possibility has been thought through and
properly mitigated.

I would ask that FERC review their decision regarding the pipeline route.
I recommend that you take a look at the Blue Ridge route because I
believe that there would be less of an impact to private citizens.

IND322-1

Thank you for the multiple opportunities to learn about and comment on
this project. I ask that you approve the permitting requests so that the
project can move closer to completion. The counties impacted need
resolution and the Jordan Cove Project opens many opportunities for our
citizens.

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IND323

Bill Walsh, Eagle Point, OR.
12 February 2015
Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426

Re: Oregon LNG Jordan Cove Energy Project LP and Pacific Connector Gas Pipeline Project LP, Docket Nos. CP13-483-000 and CP13-492-000
We are new to Oregon and new to the FERC process. We have some experience with the gas and oil industry, having lived in Utah's Uintah Basin for almost 20 years during boom and bust periods. We are members of the Nine Mile Canyon Coalition since 1999, a prehistoric and historic preservation group that has dealt with the natural gas industry projects and pipelines pushed through the canyon by industry and BLM.

I want to refer you to the List of Pipeline Accidents in the United States in the 21st Century (Wikipedia, page 1 of 62 attached). It shows quite shockingly that there have been, on average, about one accident per week of the year, from 2000 to 2015. Looking through this list, you can see that all sorts of tragic outcomes result from these incidents. Injury and loss of life. In many cases water sources are polluted through pipeline incidents.

The composite impact has been huge. Rather than seeing these as "accidents," it would be more accurate to call them "failures:" failure of equipment, but also, in a high percentage of cases, failure to monitor pipeline operations, failure to report problems, and outright cover-ups of damaging information. Huge fines have been levied on and paid by industry. More staggering is the loss of life, workers as well as nearby residents, injuries and burns and evacuations, also damage to private and public property, pollution of municipal and private water wells, aquifers, lakes, streams and rivers, irrigation systems; leaks and explosions causing fires affecting air, vegetation, streams and rivers, watersheds, fish and wildlife.

Preliminary information about the safety record of pipelines owned, built, and operated by Williams Co. - the same one we're looking at for this project are worrisome. Williams has been cited by PHMSA (Pipeline and Hazardous Materials Safety Administration) for natural gas safety violations resulting in explosions in 2008, 2011, 2012, and 2013. [As noted, we moved to Oregon from Utah. We have experience with pipelines failing. We're providing the Fire Marshall's report and an article on the Dry Canyon compressor station explosion on Nov. 20, 2012. This is the one we are most familiar with. A 12" pipe failed under a pressure surge, causing a violent explosion and fire that badly burned two workers, destroyed six giant compressors, blew a crater 15' deep by 30' across, which filled with water with a burning sludge on top. The entire compressor complex was destroyed, subsequently rebuilt. Imagine a 36-inch pipe failure.

This pipeline is one of three running through Nine Mile Canyon. We have talked to private property owners who complain bitterly that the pipeline disrupts irrigation systems, fouls the creek water, especially when the pipelines must cross streams and runoff areas, and destroys the environment for out-of-state corporate profit. They certify that the

IND323-1

IND323-2

IND323 Bill Walsh, Eagle Point, OR

IND323-1 Safety is discussed in section 4.13.

IND323-2 The Pacific Connector pipeline route does not cross through Nine Mile Canyon in Utah. The EIS discussed impacts on irrigation systems in section 4.1.2.2. Stream crossings are discussed in section 4.4. As the EIS proves, the pipeline would not be unsafe, and the Project would not degrade water quality in the long-term.

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IND323 **Continued, page 2 of 2**

pipeline company, when leaks have occurred, failed to inform local residents and farmers of toxic substances in the water.] The FERC staff concluded in the DEIS that, across all potential negative impacts, none (or the totality) would end up being significant enough to stop the project due to mitigation. Therefore, it becomes necessary for the Commission to deny permission to build the Jordan Cove Project and Pacific Connector Pipeline Project because it will degrade our state's water quality and create unsafe and dangerous conditions for our citizens. Thank you for this opportunity.

IND323-2
cont.

Sincerely,

Bill Walsh
1020 Butte Falls Hwy
Eagle Point, Or 97524
(435) 548-2630
walsh.weathers@gmail.com

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IND324

Beverly Segner, Coos Bay, OR.
To: Kimberly D. Bose, Secretary
From: Beverly Segner, Private Citizen
RE: CP13-483-00 and CP13-492-000

Comments regarding the Draft EIS for the above proposed projects

1.3 PURPOSE AND NEED FOR THE PROPOSED PROJECT
Under Section 3 of the NGA, the Commission considers as part of its decision to authorize natural gas facilities, all factors bearing on the public interest.

Comment: The DEIS is insufficient because in this section the applicant provides no specific information about how the project meets the public interest directly or indirectly. While on pg.1-13 paragraph 3 it mentions that the PCPP and JC LNG would supply additional volumes of natural gas to markets in southern Oregon, there are no plans to provide natural gas product to southern Oregon residents for their use or if so, these plans and their implications are not addressed.

In fact, there are significant testimony and reports that should be included here about the detrimental impacts of this project to the population and environment of Southern Oregon both in the construction and operation phases. The applicant also fails to address the dangers to the public interest due to citing a hazardous facility in a populated area and compare it to benefits.

I request that the DEIS be revised to include this information as a comparative analysis.

1.4 PURPOSE AND SCOPE OF THIS ENVIRONMENTAL IMPACT STATEMENT

In addition to complying with the NEPA, our purposes for preparing this EIS include:
a description and evaluation of reasonable alternatives to the proposed actions that would avoid or minimize adverse effects on the environment;

Comment: Referring to 3.1 No Action Alternative

The DEIS is insufficient because the applicant does not make a reasonable case for the benefits to the public interest for this project AND fails to specifically address the environmental impacts and/or public interest of the No Action Alternative except to say that "expansion of existing systems or construction of new facilities would result in specific environmental impacts that could be less than, similar to, or greater than those associated with the proposed Project".

It is not possible for the No Action Alternative to be reasonably evaluated without this information.

IND324-1

IND324-2

IND324 Beverly Segner, Coos Bay, OR

- IND324-1 See response to IND1-6. Public safety is addressed in section 4.13 of the EIS.
- IND324-2 The applicants did not write the EIS. The document was written by the FERC staff, federal cooperating agencies, and our contractors. The No Action Alternative (section 3.1) stated that if the Project is not authorized, or not constructed, the environmental impacts outlined in the EIS would not occur. Cumulative impacts are addressed in section 4.14.

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The analysis of the environmental impacts of other proposed projects needs to include specific details, not merely a general phrase of the obvious. In this instance, it is virtually impossible for the public or any agency to make a measured response to the DEIS and/or for FERC to make an informed decision under the NEPA requirements.

I request that the DEIS be amended to specifically define environmental impacts in a comparative fashion between alternatives as part of the scoping process to allow public comment, particularly, but not only, in relation to the No Action Alternative. The benefit of not moving forward with the proposed projects in each of the domains is an important part of a complete DEIS.

IND324-2
cont

CEQ regulations explicitly state that the cumulative impacts of a project must be evaluated along with the direct and indirect effects of each alternative. These cumulative impacts and comparisons for each alternative are not present in the DEIS related to the terminal or the pipeline.

1.4.1 Purpose and Scope of the FERC's Action

The Commission may accept the applications in whole or in part, and can attach engineering and environmental conditions to the Order that would be enforceable actions to assure that the proper mitigation measures are implemented prior to the Project going into service.

Comment: Without the specific engineering and environmental conditions explicitly defined in the DEIS, the public is unable to make informed comments about the project. To offer the option to accept the application with conditions developed by FERC at a later date does not allow for appropriate public analysis and comment.

I request that this section of the DEIS be amended to read that the proper mitigation measures are required to be outlined specifically as part of the scoping process in order to allow for public comment and agency input. Without this vital information, the public cannot participate fully in the process as outlined by NEPA. Further, mitigation measures especially when the citing of a noxious facility is proposed need to meticulously address all impacted environmental impacts including socioeconomic and health factors, among others. This DEIS is inadequate in this regard. Orders after the fact of approval and/or construction of such a project do not sufficiently allow public input.

IND324-3

1.4.2 Purpose and Scope of the Actions of the Forest Service, BLM, and Reclamation

Both the BLM and Forest Service have identified suites of "Design Features" or "Project Requirements" the agencies deem necessary to accomplish goals and objectives of their respective LMPs.

Although these actions (which are described in the BLM and Forest Service plans; see chapter 2) are specific in terms of activity and location, this EIS addresses these in a programmatic fashion. Many of these actions may require additional analyses and surveys before final decisions can be made by the federal land managing agencies.

IND324-3 Mitigation measures are presented under individual resource topics in section 4, and are summarized in section 5 of the EIS.

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Comment: Due to the amount of land and the number of service districts impacted including the fact that the PCFP is inconsistent with the LMPs of the BLM Districts and National Forests crossed by the proposed pipeline (not to mention the environmental impact on State and private land), addressing these plans (Design Features and Project Requirements) in a programmatic fashion rather than providing detailed analyses and survey in advance, does not allow the public the opportunity to comment. The need for adjustments to be made in the management plans of these agencies for the lands involved when the public has already approved these plans is a serious cause for pause and public concern. It is not as if the applicant is merely applying to build a facility in an area already meeting existing zoning requirements! This specific information needs to be provided for the DEIS to be complete and for the public to comment.

IND324-4

1.4.3.3 U.S. Department of Energy

Regarding application to the DOE for authorization to export LNG: In addition, Jordan Cove must file with the DOE copies of long-term contracts for both natural gas supply and the export of LNG.

Comment: Due to the vagaries of the natural gas market, with the change of this applicant's proposal within a 10-year period from an import to an export facility as a perfect example, it seems that this DEIS is incomplete without inclusion of signed copies of long-term contracts for supply of natural gas and the export of LNG. Approving a proposal without such assurance would be irresponsible and not in the public interest. Also, the definition of "long-term" needs to be included in the DEIS as well as confirmation through documentation that this project will meet that expectation. This information needs to be provided for the DEIS to be complete. I request that in the service of the public interest documentation of assurance of the viability of the project be provided in the form of customer contracts which demonstrate a secure financial cost/benefit for this project as part of the DEIS.

IND324-5

1.4.4 Issues Considered Outside the Scope of this EIS

Jordan Cove has not identified the specific vessels that would ship the LNG abroad or the exact customers for the LNG.

Comment: On the one hand, JC is justifying the project due to the benefits to the public of transporting natural gas from other states and exporting the product, yet does not see a need to identify sufficient detail regarding the specific impact of the vessels entering the harbor NOR a responsibility to identify customers in advance. This seems in direct conflict with the public interest and that the DEIS, in spite of the applicant's dismissal of the need to provide this information, is woefully incomplete without it. How can the applicant justify an export facility without identifying the customers?

IND324-6

- IND324-4 The design features and project requirements are described in detail in the plans of development submitted by the Pacific Connector as part of their 2013 application. The actions in compensatory mitigation plans of the BLM and Forest Service are described in section 2.1.4 and appendices F, J, and H of the DEIS in sufficient detail to allow for public comment on the actions. The details of the projects would be further defined in subsequent analysis when the projects were ripe for decision and would include opportunities for further public input.
- IND324-5 The Commission would consider long-term contracts for the natural gas and LNG (precedent agreements) in the Project Order.
- IND324-6 The EIS analyzes the environmental effects of the Project, not the need. The Commission will consider the public benefit for the project in their decision.

If the historic policy of the Commission does not include conducting a nation-wide analysis of proposed LNG export terminals than how can FERC responsibly meet the NEPA requirements for implementing the proposed actions or provide a true comparative analysis of the alternatives?
This makes the DEIS incomplete by definition.

In addition, it is stated that it is the Commission's historic policy to allow market forces to influence where LNG terminals should be situated; assuming that the locations are environmentally acceptable based on the analysis contained in a project-specific EIS.

Comment: How can a market analysis be conducted without defined relationships with customers for the product?

Companies select the location of their proposed facilities based on market and other factors, and the Commission staff analyzes the environmental impacts of construction and operation of those facilities at the selected locations. Companies would be at risk for the costs of constructing and operating an LNG terminal, as influenced by their own research into economic conditions and market needs.

Comment: While the company may be at risk for the cost of constructing and operating an LNG terminal and pipeline, it is the public that would bear the brunt of these activities and the consequences of an abandoned/failed project. For this reason, the environmental impact of any project, not to mention the proposed creation of a noxious facility that would impact 400 water bodies and be cited in a harbor in an earthquake subduction zone, needs to address the market forces and the sustainability of the market forces over a reasonable time. If this is not done as part of the DEIS, it is insufficient.

Just because the applicant states that certain issues are outside the scope of its DEIS, does not make it correct. Given the huge and hazardous breadth of this proposal, the DEIS must be meticulous and thorough. According to NEPA a DEIS should include a rigorous exploration and evaluation of all reasonable alternatives including a discussion of the probable beneficial and adverse social, economic, and environmental effects of each alternative. This DEIS by the applicant's own definition does not accomplish this and needs to be amended.

1.5.3.3 U.S. Army Corps of Engineers Review

The COE requested that the EIS address several topics including the "purpose and need for the Project. According to the DEIS: The purpose and need for the Project are briefly summarized in section 1.3 above.

Comment: The purpose and need for the project should be far more than a brief summary and ought to encompass a review of all potential alternatives for the DEIS to be complete.

4.8 RECREATION AND VISUAL RESOURCES 4.8.1 Recreation and Public Use Areas

IND324-6
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According to the BLM's Final North Spit Plan, the public lands managed by the BLM on the North Spit are designed to become the largest and most accessible tract of public green space available for the Coos Bay area communities (BLM 2005). In recognition of the area's value for outdoor recreation, the BLM designated the North Spit as a Shorelands SRMA in its Coos Bay District Resource Management Plan. The BLM counted 27,100 visits to the North Spit between October 1, 2003, and September 31, 2004. The SRMA includes 1,600 acres for OHV use along designated sand roads. These roads are also available to hikers and equestrians. In a typical year, the BLM estimated that about 460 OHVs traveled on the sand road to the North Jetty. The closest developed recreational facility to the Jordan Cove terminal within the SRMA is the BLM boat dock located about 0.8 mile southwest. According to the BLM, about 13,100 vehicles visited the boat dock in a single year, and about 420 boats were launched (BLM 2005). A survey conducted by the OPRD found that the 15-mile stretch of beach along the ocean from Ten Mile Creek to the mouth of Coos Bay was visited by an average of 38 people on a weekday, and 60 people total on a weekend day (Shelby and Tokarczyk 2002). The main activities of beach visitors in this segment include OHV use (54 percent), relaxing (21 percent), walking (16 percent), and recreational activities with dogs (4 percent). The high OHV use reflects that the northern portion of this segment is within the ODNRA.

Comment: The region effected by the proposed JC facility receives an estimated \$7.7 million in revenue and over 10% of its employment is provided by tourism. In this section, discussing the number of OHV's that travel on the sand road to the North Jetty does not adequately describe the impact the facility would have on the desirability of the whole recreational area to tourists which needs to be addressed. Further, the statistics used in the DEIS in this section date from 2003-2004, over 10 years ago. These statistics need to be updated for the DEIS to be sufficiently describe the environmental impact and the need to include a comparative analysis of the loss of tourism revenue.

The statistics describing the use of a 15-mile stretch of beach adjacent to the JC project cite date to 2002. These statistics need to be updated for the DEIS to sufficiently describe the actual impact of the proposed project. Further, as the construction phase is projected to increase the population to the area by up to 1,800 people including impacting travel across the main entry into North Bend/Coos Bay via HWY 101, averaging the daily use statistics of one stretch of beach does not give a realistic picture of the impact during high tourist season. Presented a different way even with the outdated statistics, over 15,000 people utilize this stretch of beach in a year. The question is: how many of them come in the summer months and how will the project in all its phases impact the use of this recreational area?

I ask that the statistics regarding the North Spit, North Jetty, Boat Dock, described in this section be updated in order for the DEIS to be sufficient. Also, that the statistics be presented to demonstrate use of the recreational areas affected during peak use times.

Boating and Fishing

IND324-7 Effects on tourism are discussed in section 4.9.1.7. We have not found any empirical evidence that the facility would adversely impact tourism.

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Use of the crabbing, clamming, and angling areas in Coos Bay should not be any more affected by the passage of LNG vessels than they are currently affected by the passage of other deep-draft ships. Crabbing and clamming currently occurs outside the navigation channel and would not likely be affected by an LNG vessel in transit within the waterway to or from the terminal. However, if crabbing, clamming, angling, or scuba diving activities were to occur within the established security zones, those activities would be required to cease and temporarily move out of the way. The Coast Guard and OSMB would continue to remind boaters of their obligation not to impede the deep draft ships, regardless of the cargo. Passive fishing equipment, such as crab pots, would be permitted to remain within the security zone while an LNG vessel is present, though the attending crabbing vessels would be required to vacate (Berg 2008).

Comment:

Throughout the DEIS there are numerous instances where the impact of the project is presented as "minimal". For example, stating that the passage of LNG vessels should not affect crabbing, clamming, and angling areas any more than the current impact of other deep-draft ships is misleading. Other deep-draft ships do not present the security risk or require the security precautions that an LNG vessel necessitates. The DEIS needs to present these risks and impacts in a way that is comparative. For example, with a minimum projection by the applicant of 90 LNG vessels entering the channel per year, with a minimum estimate of 90 minute trips each way, how does this translate to actual hours lost to recreational and commercial use of the bay? The public needs to be able to review and comment on these impacts during the scoping process.

IND324-8

I ask that the DEIS be amended to accurately, specifically and comparatively describe the real-time and actual behavioral responses that will be imposed on recreational boaters, crabbers, and anglers during the passage of an LNG vessel. These same descriptors also need to be provided in regard to impacts on commercial vessels, particularly fishing. I also ask that a map be provided detailing the various placements of an LNG vessel passing through the channel in comparison to required distances for boaters and fishing vessels to meet the requirement to "cease and temporarily move out of the way".

4.9.1.6 Local Infrastructure and Public Services

Medical Facilities

There are three hospitals located in Coos County. The Southern Coos Hospital in Bandon, approximately 31 miles south of the terminal, is licensed for 21 beds, and is designated a critical access hospital as well as a full-service, general acute care hospital. It is ranked as a Level 3 Trauma Center. The Coquille Valley Hospital in Coquille, approximately 25 miles south of the terminal, is licensed for 25 beds, and is ranked as a Level 4 Trauma Center. The Bay Area Hospital in the city of Coos Bay is the closest to Jordan Cove's LNG terminal, approximately 6 miles from the terminal. This facility has 172 beds licensed for acute care, and is rated a Level 3 Trauma Center. We believe that the existing medical facilities in Coos County are adequate to handle the influx of non-local workers during Jordan Cove Project

IND324-8 Security risks associated with LNG vessel traffic are addressed in section 4.13 of the EIS. According to ECONorthwest (2012e), if 90 LNG vessels visited the Jordan Cove terminal each year, there would be 60 hours total during a year when an LNG vessel would be present in the waterway (0.68 percent of the time). The sum of the time that LNG vessels may be transiting within the Coos Bay navigation channel would be about 1.3 percent of daylight hours. Thus, it appears that LNG vessel marine traffic to and from the Jordan Cove terminal would have negligible potential to affect recreational boaters and other users of the bay. This is discussed in section 4.8.1.1 of the DEIS.

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construction, and the additional families that may move to the area during operation. The Jordan Cove Project should not have any significant adverse effects on medical facilities.

Additional reference to TABLE 4.9.26-2 Hospitals in the Counties Crossed by the Pacific Connector Pipeline

As noted above, Pacific Connector has developed a Safety and Security Plan. Measures the company would implement to keep its employees safe include training of on-site personnel in first aid and use of CPR.

Comment:

According to the U.S. Department of Health and Human Services Health Resources and Service Administration, Coos Bay/North Bend is a Primary Care Health Professional Shortage Area and is a Medically Underserved Area/Population. Stating in the DEIS that the existing medical facilities in Coos County are adequate to handle an influx of non-local workers and that the JCP should not have any significant adverse effects on medical facilities completely disregards the current shortage of medical, dental, and mental health professionals in the area.

In comments made for the import facility it was noted that the presence of an LNG terminal in an area having difficulty recruiting physicians as it is, would make Coos County a less desirable place to live and further negatively impact recruitment of qualified health professionals. This was not addressed in the current DEIS nor its impact on health care in the area.

In addition, the Department of Health and Human Services Office of Emergency Medical Services reports there are no hospitals in the region impacted by the proposed JCP/PCP with a Trauma Level Rating higher than III. OEMS describes one of the primary functions of Level III and IV designated facilities as to arrange transfers to facilities that can provide definitive trauma care. Detailed descriptions of the limitations of trauma care available within the vicinity of the proposed JCP and the ramifications of this to the public need to be included in an adequate DEIS.

It bears mentioning that the hospital closest to the proposed JCP, Bay Area Hospital, has 129 beds and only a Trauma Level III designation. Further, BAH is located on the opposite side of the McCullough Bridge from the proposed facility and if the bridge were compromised, access would be as well. Also located on the south side of the bridge from the proposed facility with an approximate traveling distance of 25-30 miles each are 2 hospitals with Level IV Trauma Care and a total of 44 beds. The hospital north of the facility is approximately 26 miles distant and has 16 beds with no trauma level designation. While the distance, location and trauma designation of these facilities are mentioned in the current DEIS, the potential detriment to the workers and public is not clearly discussed, but the implications are minimized.

The implication that a "Safety and Security Plan" including training on-site personnel in first aid and CPR is sufficient to ameliorate the hazards to the workers and the public in both construction and operation

IND324-9 The FEIS has been updated to reflect additional information about the current shortage of health professionals and Jordan Cove's plan to address medical needs of its non-local workforce.

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phases because the applicant declares the "pipeline would be safely installed...and would not be a threat to public safety" fails to responsibly address the potential need for medical care in the event of an accident. Further, the safety and ability to treat either workers or the public due to injuries related to the proposed JCP need to be more fully addressed.

I request that the DEIS be revised to add a careful analysis of the impact of the project on an already strained medical delivery system in Coos County including the lack of Level I and II trauma care facilities in the counties crossed by the PCP. Additionally, a clear, detailed plan of how emergency care services would be provided in the event of a major incident potentially involving the over 16,000 people residing within Zones of Concern 1, 2, and 3 needs to be included.

4.9.2.3 Property Values

Comment: In the DEIS the LNG facility is described as one of a group of noxious facility types and the DEIS is therefore required to address impact of placement on property values. To come to the conclusion that property values in the region would not be affected, the DEIS cites several sales comparison studies. To make an appropriate comparison as required by NEPA, a study based on sales using profiles of consumers currently purchasing property in areas that could be impacted (including along the proposed pipeline route in which 68% of the properties impacted are privately owned) needs to be undertaken.

IND324-10

In addition, according to a document prepared for the DOE regarding accurate analysis of noxious facilities on property values, psychometric studies indicate that the US population is averse to living near noxious facilities. Contingent valuation and hedonic studies find that the net economic impacts of proximity to noxious facilities are generally negative and often substantial. This information is in direct contradiction to that supplied in the current DEIS. The key to predicting perception-based impacts lies in combining psychometric and hedonic methods. The reliability of psychometric measures as indicators of aversive stimuli that precipitate economic impacts can be empirically tested. To test the robustness of the findings, alternative estimation methods can be employed in the hedonic analysis. Contingent valuation methods can confirm the results.

In order to be adequate, I ask that the DEIS be amended to include a study using a predictive model of perception-based impacts and identify the data and methods needed to implement it as part of the scoping process. Without a reliable and current study of the public perceptions of the proposed JCP and PCP as described, the current DEIS is insufficient and does not accurately predict the impact of the proposed facility and pipeline on property values.

The North Bend area, especially that nearest to the proposed JCP and the area across the bay is particularly desirable as residential property because of its proximity to the bay and the views.

IND324-10 We used the available studies on property values to draw conclusions.

Land proposed to be crossed by the pipeline includes ranch and farmlands desirable due to usability. All of these functions are negatively impacted by proximity to a noxious facility and/or pipeline. I ask that the DEIS address this issue using state-of-the-art surveys and study methods directly involving the people in the area as this is the only way for the analysis to be accurate. "Overall, the welfare losses to changing the status quo in these matters are incurred by the original residents, not by the in-migrants." An exact description of these potential losses needs to be clearly outlined for the DEIS to be complete. With that said, there is also information lacking on the analysis of out-migration as a result of the proposed facility and its impact on the community. This needs to be included for the DEIS to be adequate.

According to a study on the effect of power plants on local housing values and rents by Lucas W. Davis (May 2010), "across specifications the results indicate 3-7 percent decreases in housing values and rents within two miles of plants with the semiparametric estimates suggesting somewhat larger decreases within one mile. In addition, there is evidence of taste-based sorting with neighborhoods near plants experiencing statistically significant decreases in mean household income, educational attainment, and the proportion of homes that is owner occupied."

Because the project includes a power plant, specific information about the impact of such a facility on property values and other environmental impacts need to be addressed, particularly as relates to the potential for negatively changing the socioeconomic demographics of an area. Stating that impacts are "relatively" small because plants tended to be opened in locations where the population density is low is misleading because part of the attraction of the area impacted which contributes to higher property values is the lower population density.

Without addressing this, the DEIS as it stands is misleading and incomplete regarding impact on property values and the rental housing market. Reducing the socioeconomic status of an area near a noxious facility also impacts environmental justice whereby people of lower income may be forced by the changing market to locate in these areas. This needs to be addressed as well for the DEIS to be complete.

4.9.1.9 Environmental Justice

Comment: Regarding National Response to Emergency, there are three main definitions out there from federal and other agencies, the definition used in the National Response Framework (NRF) is as follows: Populations whose members may have additional needs before, during, and after an incident in functional areas, including but not limited to: maintaining independence, communication, transportation, supervision, and medical care. Individuals in need of additional response assistance may include those who have disabilities; who live in institutionalized settings; who are elderly; who are children; who are from diverse cultures; who have limited English proficiency or are non-English speaking; or who are transportation disadvantaged.

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The Comprehensive Preparedness Guide (CPG) 301, Emergency Management Planning Guide for Special Needs Populations Federal Emergency Management Agency and DHS Office for Civil Rights and Civil Liberties: This definition is the same as the NRF.

A second definition is put forth by the US Department of Health and Human Services, At Risk, Behavioral Health, and Human Services Coordination (ABC) are using the following definition:

Before, during, and after an incident, members of at-risk populations may have additional needs in one or more of the following functional areas: communication, medical care, maintaining independence, supervision, and transportation. In addition to those individuals specifically recognized as at-risk in the Pandemic and All-Hazards Preparedness Act (i.e., children, senior citizens, and pregnant women), individuals who may need additional response assistance include those who have disabilities, live in institutionalized settings, are from diverse cultures, have limited English proficiency or are non-English speaking, are transportation disadvantaged, have chronic medical disorders, and have pharmacological dependency.

The third definition by the Association of State and Territorial Health Officials (ASTHO) is similar to the one adopted by ABC, but adds in additional factors to consider such as economic disadvantage and a lack of a support system.

In order to be complete and in the interest of environmental justice, I ask that the DEIS include an emergency response plan that specifically addresses the functional areas and additional needs of at-risk populations defined by the U.S. Department of Health and Human Services before, during, and after an incident. The groupings and percentages of these at-risk populations in the areas impacted by the proposed JCP and FCP also need to be expanded in the DEIS to include all categories identified as having special needs as described above.

These at-risk populations described above are further compromised and potentially affected in terms of access to regular health care services by an influx of temporary workers and their families in an area already identified as medically underserved by the federal government. In order to be sufficient, I ask that the DEIS include a mitigation plan to address this impact.

The applicant reports not being able to "clearly identify" at risk populations in the buffer zone of the proposed JCP. This is unacceptable and needs to be addressed in an amended DEIS. At the least the applicant can apply the known percentages of the at risk populations identified in the U.S. census and create a plan accordingly. (For example, the percentage of seniors is defined as over 21% for the region and is greater than the state average, therefore a plan could be developed based on this percentage of the population in the buffer zone with percentages applied for creating appropriate emergency management plans for other at risk populations accordingly) This needs to occur for the DEIS to be complete.

Accidents

Comment: I request that the DEIS be amended to include the recent industry accidents involving the Yellowstone River in Montana including

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IND324-11 Section 4.13 discusses reliability and safety concerns. The FERC is requiring Jordan Cove to develop an Emergency Response Plan prior to initial site preparation. Section 4.9 discusses at risk populations in the project area. The Project would not adversely affect disproportionate numbers of low income or minority populations.

IND324-12 Safety is discussed in section 4.13.3. Section 4.13.6.1 includes accidents involving LNG facilities. Oil spills in Montana are not representative of the Project being analyzed in the EIS. The FERC does not regulate the siting or operation of oil pipelines. Section 4.13.6.2 discusses Coast Guard oversight of LNG vessels.

IND324-11

IND324-12

details related to damage to the watershed and all aspects of deleterious environmental impact to the area. Also, the same should be included related to the recent running aground of the LNG vessel outside of Nigeria. Because the applicant has emphasized the minimal impact of accidents on the public and the environment, it seems vital for these recent incidents involving the industry to be included because of the noxious and hazardous nature of these projects including short-term and cumulative effects.

IND324-12
cont

Children's Health and Safety

Comment:

According to a memorandum from the U.S. Environmental Protection Agency, sent by Susan Broom, Director, Office of Federal Activities and Peter Grevatt, Director, Office of Children's Health Promotion: "Executive Order 13045, "Protection of Children from Environmental Health Risks and Safety Risks" (April, 1997) directs Federal agencies, to the extent permitted by law and appropriate, to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children and to ensure that policies, programs, activities, and standards address disproportionate risks to children that result from environmental health or safety risks.

It is well documented that children are more susceptible to many environmental factors that are commonly encountered in EIS reviews, including exposure to mobile source air pollution, particulate matter from construction or diesel emission and lead and other heavy metals present in construction and demolition debris. We recommend that an analysis of potential impacts to children be included in a draft EIS if disproportionate impacts on children cause by the proposed action are reasonably foreseeable. Childhood exposures at each life stage, including those experienced via pregnant and nursing women, are relevant and should be considered when addressing health and safety risks for children.

We recommend that the draft EIS assess children's potential exposures and susceptibilities to the pollutants of concern, including the following: Identification of the pollutants and sources of concern, Exposure assessment, Baseline health conditions, Impacts from Air Pollutant Emissions, Respiratory Impacts/Asthma, Noise impacts, Impacts Regarding Obesity Factors, especially impacts on accessibility of parks, green spaces, and recreation areas, potential impacts to the food and water supplies of traditional life-ways of tribal children, Air Quality Impacts from Non-Mobile Source Emissions, especially adverse impacts due to increased emissions from power plants, Impacts from Mobile Source Air Pollutant Emissions including exposure from project construction and operations including significant increases in traffic which impact safety, projects which introduce significant new vehicle and truck traffic on roads near residential neighborhoods and areas where children are likely to be present, Impacts from Other Chemical or Physical Exposures such as pesticide application, demolition etc., Projects that could bring children into contact with soils that could be contaminated."

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IND324 Continued, page 12 of 12

The current DEIS fails to address the special risks to children's health and safety in the aforementioned areas and I ask that it be amended to do so in order to be considered adequate. The zones of concern identified in the DEIS include 6 schools and well-over 3,000 children. These numbers do not include Southwestern Oregon Community College which is located in Zone of Concern 3 and has a Family Center on site which provides day care to 30 toddlers. Both the proposed Jordan Cove Project and the PCP create environmental hazards to children that have not been sufficiently evaluated, for example, the application of pesticides in areas susceptible to pesticide drift to maintain the 50 foot wide permanent easement required by the pipeline project. Nor does it evaluate the health risks during the building phase and the need for a 95 ft. wide construction zone for the pipeline. The construction zones and the noise from the proposed JCP will be within proximity of schools and day care centers (as well as residential areas) and the impact of this on children has not been addressed.

IND324-13

There has been public testimony by physicians regarding the negative impact to children due to the changes in the air quality because of the proposed project, yet, the applicant has not seen fit to evaluate these hazards to vulnerable populations (children, in this case). For example, studies on the impact of residential proximity to potential environmental hazards on cardiovascular, respiratory and chronic illness are not sufficiently represented. Without this analysis and information, the DEIS is incomplete and I ask that this information be included. The direct, indirect as well as the cumulative impacts must be evaluated for the DEIS to be considered complete.

Of additional concern, is the impact on the health of the disproportionate number of seniors currently living in the area which is also not addressed adequately in the DEIS.

There is conflicting testimony on the impact of the closure of the airport during the time an LNG tanker would be en route to the terminal, particularly to critically ill or traumatized patients (including vulnerable populations and children) needing to be airlifted for appropriate treatment. This impact needs to be assessed and addressed in an amended DEIS.

Closing Comment:

This DEIS, in general, seems to be attempting to justify the applicant's project rather than provide a rational examination of reasonable alternatives presented in comparative form. All too often in this document the phrase "minimal impact" or other similar subjective language is employed which could be construed as attempting to slant the choices in favor of the applicant. In my opinion, this has led to the creation of a DEIS that sadly fails to rigorously explore and objectively present the issues and alternatives to allow for an honest and clear appraisal of the proposed project. I ask that the DEIS be revised to address the concerns outlined in my comments so that we may have an unbiased and thorough Environmental Impact Statement to review.

IND324-14

IND324-13 As explained in section 4.9, the number of children in the project area is below the state average; therefore they would not be disproportionately impacted by the Project. In fact, in Coos County, Jordan Cove would contribute \$20 million per year to educational funding; thus having positive benefits for schools. As stated in section 4.12.2.4, operational noise from the Jordan Cove terminal would be below 45 dBA at the nearest noise sensitive areas, and so the Project would not have significant adverse impacts on schools, day care centers, or residences much above current ambient noise levels. Pacific Connector would only use pesticides in rare and limited situations, as stated in section 4.5.1.2. The Project would have no long-term adverse health impacts on children, as construction would be temporary.

IND324-14 The EIS is not biased, and was produced by an independent team of environmental scientists from the FERC, cooperating agencies, and our contractors, using facts to support our conclusion.

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IND325

Diane and David Bilderback, Bandon, OR.
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Kimberly D. Bose, Secretary
FERC
888 First Street NE, Room 1A
Washington, DC 20426

February 12, 2015

Docket Numbers CP13-483-000 and CP13-492-000
Comments on Draft EIS for the Jordan Cove Project

The Draft EIS (DEIS) prepared by FERC violates the regulations set forth in the National Environmental Policy Act (NEPA) and for that reason should be rescinded and a new DEIS prepared that actually complies with NEPA. Our comments in this letter will address how we feel that the DEIS is not complying with NEPA and what additional information would be necessary to make it comply.

NEPA regulations governing a draft EIS state that it must be objectively prepared and not slanted to support the choice of the agency's preferred alternative over the other reasonable and feasible alternatives and that all reasonable alternatives must be examined. Yet, FERC's DEIS does not discuss any other possible alternatives to the construction and operation of the Jordan Cove Project, but rather it prepared a DEIS that "assesses the potential environmental effects of the construction and operation of the Jordan Cove Project" , making it clear that the project is a pre-conceived decision.

NEPA regulations also say that an EIS must examine all reasonable alternatives to the proposal. Furthermore, the U.S. Environmental Protection Agency says "the EIS should reflect not only the FERC's purpose, but also the broader public interest and need. We recommend discussing the proposed project in the context of the larger energy market, including existing export capacity and export capacity under application to the Department of Energy, and clearly describe how the need for the proposed action has been determined". (EPA Scoping comments for Jordan Cove, page 3). But on DEIS, page 1-22, FERC states: "FERC does not engage in regional planning exercises that would result in the selection of one terminal location over another. Instead, it is the Commission's policy to allow market forces to influence where LNG terminals should be situated." Of the 14 proposals before FERC currently for LNG export terminals, 13 of these proposals are logically located to take advantage of existing infrastructure, with the sole exception being Jordan Cove and so, would and should have been discussed as "reasonable alternatives" to the Jordan Cove project. The Jordan Cove project will require massive dredging in an estuary with 4 U. S. Environmental Protection Agency Superfund Program sites, is located close to the

IND325-1

IND325-2

IND325-3

IND325 Diane and David Bilderback, Bandon, OR

- IND325-1 The EIS complies with the regulations for implementing the NEPA at 40 CFR 1500-1508. Alternatives are discussed in chapter 3. No decision had been made yet about this Project.
- IND325-2 The EIS is not a decision document; its purpose is analyze Project environmental effects. The Commission will make a decision about the need for the Project in its Order. The DOE makes a separate decision about the public benefits of exporting LNG, as explained in sections 1.4.3.3 and 1.4.4. Section 3 of the EIS discusses other LNG export terminals as alternatives to the Project.
- IND325-3 Information on dredging and disposal of dredged material is found in section 2.1.1.12. We acknowledge that the Jordan Cove LNG terminal is located within the Cascadia Subduction Zone, and the EIS addresses seismic hazards in section 4.2. Impacts on waterbodies are discussed in section 4.4.

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Cascadia Subduction Zone with a large earthquake and subsequent large tsunami hazard, would cross over 300 streams that provide critical habitat for threatened salmon species, require land use changes by the US Forest Service, Bureau of Land Management as well as other Federal agencies, and would affect hundreds of landowners. We do not see in the DEIS any clear discussion of why there is a "public need" to undertake this project. Most important, there should be a discussion that determines if any of the other 13 export terminals proposals could meet this public need without the terrible environmental and life-disrupting effects.

IND325-3
cont.

NEPA regulations require that an EIS must describe the environment of the area to be affected by the alternatives, including the proposed action, under consideration. The Environmental Protection Agency Scoping comments for the Jordan Cove Project, page 13, states the following, "The cumulative impacts analysis should identify how resources, ecosystems and communities in the vicinity of the project have already been, or will be affected by past, present, or future activities in the project area. These resources should be characterized in terms of their response to change and capacity to withstand stresses. These data should be used to establish a baseline for the affected resources, to evaluate the significance of historical degradation, and to predict the environmental effects of the project components." Unfortunately, FERC omitted the segment on Affected Environment from the DEIS for the Jordan Cove Project, making this an obvious violation of the NEPA regulations and clearly ignores the recommendations of the Environmental Protection Agency.

IND325-4

NEPA requires the "Environmental Consequences" section of the EIS to be the scientific and analytical basis for the comparison of the proposed action and all reasonable alternatives. The DEIS discloses that Jordan Cove examined seven ports in California, 14 in Oregon, and 17 in Washington to determine their suitability for the location of an LNG export terminal. Jordan Cove decided on Coos Bay for its terminal location. Yet, in DEIS, page 3-11, the DEIS states, "After reviewing these data, the FERC was unable to identify any other alternative port location on the Northwest Pacific Coast that could meet the objective of the Jordan Cove Project and that would have significant environmental advantages over Coos Bay". There is no discussion or analysis of the ports that were considered, or the comparative assessment of their environmental conditions in comparison to Coos Bay or any of the criteria that was used to select Coos Bay as the preferred location as is required by NEPA.

Another missing environmental consequence discussion in the DEIS is that of the "7.3 mile long waterway in Coos Bay for about 80 LNG carriers per year" mentioned in the EPA scoping comments on page 1. The DEIS should include the environmental consequence of the excavation of that huge amount of material that will need not only be done initially but also annual maintenance and how this will impact the oyster industry, the crabbing and fishery industries and the whole ecosystem of the Coos Bay estuary.

IND325-5

IND325 Continued, page 2 of 3

- IND325-4 The Commission will determine the public need for the project in their Public Order.
- IND325-5 We discuss impacts associated with about 90 LNG vessels using the waterway to reach the Jordan Cove terminal throughout the EIS. Information on dredging and disposal of dredged material is found in section 2.1.1.12. Effects on aquatic species are addressed in section 4.6.1.1.

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IND325 **Continued, page 3 of 3**

So in conclusion, the DEIS for the Jordan Cove Project violates the National Environmental Policy Act. It does not propose alternatives, does not adequately discuss environmental impacts of the project nor does it provide the scientific and analytical basis to make a decision and so needs to be rescinded, and a new DEIS be prepared that will comply with NEPA!

Sincerely,

Diane and David Bilderback

20150213-5017 FERC PDF (Unofficial) 2/13/2015 12:11:10 AM

IND326

Scott Swindells, Grants Pass, OR.
I am writing in opposition to the liquefied natural gas pipeline in Southern Oregon.
There are several reasons why this is a bad idea. There are two that bother me the most. The first reason is the improper use of eminent domain, that is using eminent domain to take or degrade private property for someone else's private development. This pipeline is not a significant benefit to the general public.
The second aspect of this which I think is bad is the export of American natural resources for private gain. The general population will suffer whatever environmental degradation comes with producing and exporting the gas, and will likely pay higher natural gas prices in the future as the local gas is exported.
I am asking you to reject the permit for this pipeline.
Thank you for your efforts.
Sincerely , Scott Swindells

IND326-1

IND326-2

IND326-3

IND326 Scott Swindells, Grants Pass, OR

- IND326-1 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947.
- IND326-2 The Commission would determine public need in the Project Order.
- IND326-3 As stated in section 1.4.3.3, the DOE would make determinations about the public benefits of exporting LNG. See response to IND37-4.

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IND327

IND327 Pamela B. Ordway, Portland, OR

Pamela B Ordway, portland, OR.

The Draft EIS does not adequately address the negative impacts the proposed pipeline would have on the many small landowners whose land lies in the path of the Pacific Connector Pipeline. Below are some of the many negative impacts that have been either glossed over or completely ignored.

1) The State of Oregon's current Coastal Zone Management Plan is not currently robust enough to meet the requirements of the Coastal Zone Management Act put in place by Congress in 1972. Specifically, that the State of Oregon's current plan does not sufficiently address riparian protection for medium and small fish-bearing streams and non fish-bearing streams. As the Draft EIS for the Pacific Connector Gas Pipeline indicates, the proposed route impacts more than 400 water bodies. While the Draft EIS shows attempts to "mitigate" the damage Pacific Connector proponents admit they will cause, it also acknowledges that it will reduce shade canopies on fish bearing streams thus increasing the temperature of the water. The proposals they put forth are based on regulations Oregon has in place with current, insufficient CZMA plans. Pacific Connector needs to wait for the new Oregon CZMA guidelines that meet the criteria of the Federal Coastal Zone Management Act of 1972. Or, if that is deemed unfeasible, their proposed mitigation measures need to substantially exceed current requirements. As the State of Oregon is also not meeting requirements of the CZMA for practices to reduce runoff from landslide areas, Pacific Connector needs to re-tool their mitigation plans for the numerous landslide areas they are proposing to cross with the pipeline, including the new route in the Coast Range surrounding Camas Valley. They also need to strengthen their proposals for containing herbicides sprayed near waterways as that is yet another area where current State of Oregon guidelines fall short of those required by the Coastal Zone Management Plan Act of 1972.

2) The valuation reports cited as evidence that property values are not negatively impacted are based on out of date, irrelevant data. All reports substantiating Pacific Connector's contention that 36 inch pipelines transmitting natural gas at over 1000 psi do not substantially diminish property values were generated during a time when real estate value increases were at a historical high. By Pacific Connector's own admission, reports cited were produced showing property values not declining reflect transactions between 2004-2008. This time period has been consistently referred to as a "real estate bubble," and consequently is not an accurate reflection of how property values will be impacted in a typical real estate market. In addition, several of the reports cited are taken from areas that do not reflect similar property types; the largest reports cover towns in Arizona and subdivisions in Medford, Oregon. The vast majority of the proposed pipeline will traverse forestland and farmland where future uses will be severely curtailed. In addition, there is no indication of the size of the pipelines referred to in the report. A 3 inch pipeline running at a psi of 10 or 12, servicing a residential property, will have significantly less impact than a 36 inch pipeline operating at 1400 psi.

3) Pacific Connector contends that their clear cut easements will act as "fire breaks" when in fact the clear cut easements will increase the fire hazard in forest lands. In their plan, Pacific Connector will require 90

IND327-1

IND327-2

IND327-3

IND327-4

IND327-5

- IND327-1 Impacts on landowners whose property would be crossed by the pipeline, including effects on property values, are addressed in section 4.9.2.3.
- IND327-2 The opinion on the adequacy of Oregon's Coastal Zone Management Plan has no relevance to the FERC's review of the Project. As stated in section 1 of the EIS, Jordan Cove and Pacific Connector have applied to the Oregon Department of Land Conservation and Development for a finding that their Project would be consistent with the national Coastal Zone Management Act. Impacts on waterbodies are addressed in section 4.4.
- IND327-3 See response to IND327-2 above.
- IND327-4 Comment noted. The analysis used available data.
- IND327-5 The potential for wildfires, and measures that would be implemented to reduce fire risks are discussed in sections 4.5.1.2 and 4.13.9.1.

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foot wide easements that will increase the risk of fire spreading. Industry standards for fire breaks are that the break be a width of 2-3 times as wide as the height of the nearest surface vegetation. In the case of timber stands where the trees are 70-90 feet tall, a fire break needs to be at a minimum, 140 feet wide to be effective. In addition, the ground needs to have the mineral soil exposed. In the case of the proposed easements, the width is not sufficient to be effective and the low growing vegetation that will be left will act as highly flammable fuel for fires. So, rather than helping suppress forest fires, the easements will more likely contribute to and exacerbate forest fires. 4) Pacific Connector contends that clear cuts will not be impacted because the trees have already been harvested but this overlooks the critical fact that all clear cuts either have been or will be replanted. In their designation of the potential visual impacts of the pipeline, Pacific Connector proponents indicates that the pipeline will traverse many areas of current clear cut timberlands and therefore the pipeline will not impact those areas at all. That statement shows a lack of understanding of the areas affected. All areas that have had timber harvested either have had tens of thousands of dollars spent on reforestation as mandated by the Oregon Forestry Practices Act, or if the harvest has occurred recently, it will be replanted in the near future. So, during the course of the proposed 30 year lifetime of the pipeline, trees that have been planted at the outset of this process, will have reached a typical height of at least 60 feet. In fact, trees that we were planted in 2006 have now reached heights exceeding 18 feet.

IND327-5
Cont.

IND327-6

IND327-7

IND327 Continued, page 2 of 2

- IND327-6 Comment noted. Effects on timber harvest are addressed in section 4.5.2.2.
- IND327-7 Landowners would be compensated for the loss of timber and young forest stands. Outside of a 30-foot strip centered on the pipeline, Pacific Connector would replant trees within the construction right-of-way in forested areas. See section 4.5.2.2 of the EIS.

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IND328

Pamela B Ordway, portland, OR.
In another 30 years, that land that Pacific Connector currently refers to as "clear cuts," will have standing timber in heights of more than 60 feet. A 90 foot wide easement will most assuredly be noticed.
5) The Draft EIS fails to mention all communities affected by this process. Although the Pacific Connector is proposed to bisect the community of Camas Valley in Douglas County, the details of the location of the pipeline is discussed at great length but no mention at all is given to the community. It is a community of 883 people with a median household income of \$52,679 and an unemployment rate of 9.9%. The only road that links this community with professional medical services in under two hours would be crossed by the Pacific Connector Pipeline. Should the natural gas pipeline rupture near that road, Highway 42, this community would not have timely access to medical services. In addition, when calculating underserved communities that Pacific Connector will be working with to help mitigate the disruption caused by the pipeline, including those with low income levels, no mention is made of plans to help mitigate damage to the community of Camas Valley.
6) There is no mention at all to the loss of income and potential income to those holding land the proposed pipeline intends to cross. Although the draft EIS makes a weak attempt to address the reduction in value to property impacted by the pipeline should a landowner attempt to sell their impacted land, there is no mention at all to those landowners who are so heavily vested in their land that they either do not want to sell or are unable to do so, and would like to continue to produce income from their property. Nowhere in the draft EIS is there any reference to reduction in productivity that the pipeline would cause. Timberland taken out of production will be substantial; the reduction in the value of potential home sites that will no longer be viable; Christmas tree farm land taken out of production; nursery land taken out of production. The majority of the farm and forestland this pipeline would traverse is located in areas that have limited opportunities for harvesting products and at least two of the most lucrative -- timber and Christmas trees -- will be removed from the options available. In addition, no calculation of lost revenues from an explosion -- and they do happen -- has been included. When an malfunction, not even an explosion, occurs, communities have to be evacuated. Schools and businesses shut down, people told to vacate their homes; there is a cost to that through lost production, lost learning time and the stress of leaving your home at a moment's notice. In some instances, people have had to leave their homes overnight and businesses have to shut down for the entire day. Where is that cost accounted for?
The overwhelming tone of the draft EIS is, "Yes, we know we are going to harm the environment, put people's lives and homes at risk, and permanently alter the landscape across the State of Oregon, but we are going to make our shareholders a lot of money, so just roll over and let us do it." The environment and citizens of rural Oregon be damned!
The proposed pipeline would permanently impact approximately seven acres of farm and forest land that has been in my family since the late 19th century; land that we plan on passing down to the next generation. While I have questioned the wisdom of placing a potentially explosive and dangerous facility on a sand spit in a Tsunami zone, I have focused my

IND328-1

IND328-2

IND328-3

IND328-4

IND328-5

IND328-6

IND328 Pamela B. Ordway, Portland, OR

- IND328-1 Outside of a 30-foot strip centered on the pipeline, Pacific Connector would replant trees within the construction right-of-way in forested areas. Visual impacts along the pipeline route are discussed in section 4.8.2.2.
- IND328-2 Camas Valley is mentioned in section 1.2, and 3.4.2.4. Socioeconomic impacts on communities along the pipeline route, including public services, are discussed 4.9.2. In fact, by generating tax revenues to counties crossed, the Pacific Connector pipeline would have positive benefits for public services in local communities.
- IND328-3 The Pacific Connector pipeline would have not have disproportionate adverse impacts on low income populations, as explained in section 4.9.2.9.
- IND328-4 Impacts on landowners whose property would be crossed by the pipeline, including effects on property values, are addressed in section 4.9.2.3.
- IND328-5 See the discussion in section 4.5.1.2, the landowner would be compensated for the loss of timber.
- IND328-6 Safety is addressed in section 4.13.

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IND328 **Continued, page 2 of 2**

comments on those areas that I have personal knowledge of. In the draft EIS, the proponents of the pipeline state that they "do not plan to expand," or "do not plan on abandoning the pipeline," but given their track record of totally reversing the purpose of this project from natural gas import to natural gas export, their ability to judge the market. It makes little sense to do permanent damage to so much land when, as we can see from the dramatically shifting fossil fuel marketplace, the life cycle of these projects is but a small, small fraction of the time it would take to repair all the damage to the environment --- let alone the people's lives -- that this project would cause if it is allowed to move forward.

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IND329

Alexis S Reed, Eugene, OR.
To Whom It May Concern:

I am writing to voice my concern about the Jordan Cove LNG Terminal and Pipeline proposal.

The release of greenhouse gases into the atmosphere from the fracking and the plant itself are my biggest concern. I don't want a project in my state contributing to global warming on such a level.

I also do not support the clear-cutting that would make the pipeline possible, nor the risk to Oregonians in rural areas who would be living near the pipeline.

I can only imagine the potential disaster that could come of having such an operation located where it is proposed in the Cascadia Subduction Zone if we were to experience a significant earthquake.

This proposed project seems like a disaster in the making, especially given that the decision seems to be rushed, that those who would be impacted (that is all of us) have not had adequate time to educate others and respond, and that all of the potential impacts have not been fully considered.

I strongly urge you not to move forward with this project.

Sincerely,
Alexis Reed

IND329-1

IND329 Alexis S. Reed, Eugene, OR

IND329-1 See responses to IND1-1 and IND6-1. The pipeline would not be a risk to residents of southern Oregon; see section 4.13. Outside of the 30-foot-wide corridor centered on the pipeline, the construction right-of-way would be replanted, as explained in section 4.5. We acknowledge that the Jordan Cove LNG terminal is located within the Cascadia Subduction Zone, and the EIS addresses seismic hazards in section 4.2. The decision is not rushed, the FERC staff has been studying this Project for almost ten years. Potential impacts have been fully considered in the EIS.

IND330

Paula Yablonski, Azalea, OR.

I am totally opposed to this project. I cannot believe that our government would let this destruction come to our land and threaten things as important as water and air. The plan states the LNG pipeline project "would contain measures to minimize impacts on water quality and air quality" but it doesn't seem like that is true at all. There is nothing about this plan that is concerned or will protect our air and water quality. Do not go ahead with this project, the LNG pipeline in Oregon is a bad idea and Oregon will LOSE in many ways.

Last week America participated in an international meeting about what to do about the warming planet. I cannot believe we would do something in Oregon that not only contributes to polluting the planet and creating much more warming possibility with the amount of fossil fuel this pipeline would spew into our earth, but also to cut down so many trees, where the pipeline will run. We totally need these trees for a more important issue; we need those trees to store CO2 to help cool our planet.

This project will pollute a tremendous amount of water, so not only will we lose our trees that help keep our Oregon air clean and could store CO2 to help keep our planet stable, but this project will introduce toxins that cannot be removed from our water. This is not acceptable. Erosion caused by implementing the build of this pipeline will compromise local watersheds. Too much water will be pulled out of watershed to scrub this pipeline with the pig. Please leave that water where it belongs, we need it too much where it is at. As our planet heats, water is more and more precious. This much water should not be devoted to this poor idea of a project, especially since the project will contribute to the very conditions that will dry up our water in future days. Please do not do this. Oregon doesn't want it; it is not good for us. This is too much sacrifice to us and to our country and planet. The temporary jobs it claims to create are not sustainable and not the work we want. Do not try to pay us to destroy our home.

The LNG will completely affect too many watersheds as it rips along the forested mountains. The benefits of this ill conceived idea (AKA LNG pipeline) DO NOT outweigh the terrible consequences of what this will do to our water system. Taking too much water out of local watersheds, tearing up the land causing erosion in streams, introducing toxins to our water and cutting too many trees, and putting LNG into the environment at all under the warming planet conditions are reasons to not continue with the LNG pipeline.

IND330-1

IND330-2

IND330-3

IND330 Paula Yablonski, Azalea, OR

- IND330-1 No decision has yet been made by the Commission whether or not to authorize the Project.
- IND330-2 The proposed pipeline would transport natural gas in a vapor state (not LNG). Section 4.4 addresses impacts on waterbodies. Air quality is discussed in section 4.12.
- IND330-3 Impacts on waterbodies are addressed in section 4.4. The EIS discusses erosion control measures that would be implemented. Outside of the 30-foot-wide corridor centered on the pipeline, trees would be replanted in construction right-of-way, as explained in section 4.5. Many people in Oregon do want this Project, and the economic benefits, including jobs, are outlined in section 4.9.

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IND331

Maria Farinacci, Eugene, OR.
To the Federal Energy Regulatory Commission,
The proposed Jordan Cove LNG Terminal and Pipeline is of great concern to me, my friends, family, and coworkers. This projects Environmental impact statement has failed to consider all of the impacts that this proposal will have on the watersheds, wildlife, and communities in the surrounding areas, as well as all over the country and the world. The EIS also contains violations of the NEPA, ESA, and the IPCC.
The company has stated that the Purpose and Need for this project is to continue the national fracking boom. The EIS for this project has failed to consider the cumulative impacts of fracking on our lands, water, and air. The FERC should be held accountable to recognizing all the the impacts of a project this large, and the NEPA requires that all impacts must be disclosed. The impacts of Fracking as well as the Terminal and Pipeline have not been fully disclosed.
The Intergovernmental Panel on Climate Change (IPCC) has stated that all of the large governmental organizations must recognize their contribution to climate change, and must reduce our reliance on fossil fuels by over 80% by 2050. The propose Jordan Cove LNG project will allow for the fossil fuel industry to have a stronghold well after 2050, which does not lead to a reduction!
The FERC dos not considered many scientifically significant findings about the impacts of natural gas and methane on the environment. I request that the FERC does more research and publishes more significant scientific studies on the issues and impacts, that show all impacts that natural gas could have, this way the public can be informed on the decisions they are making when commenting on this project.
This EIS has not allowed enough time for the public to give full consideration to the potential impacts of a project of this magnitude. I request an extension on the commenting period of this project, more tours of the area so that locals and other peoples around Oregon can have a more complete assessment of the project.
FERC failed to consider the impacts of the LNG terminal being built in the earthquake subduction zone and tsunami area of Coos Bay. The public must be informed about these potential impacts.
Over 300 Oregon landowners are facing the threat of eminent domain from the 230-mile long pipeline needed to feed the LNG terminal. The FERC does not have to right to allow any company, foreign or not to condemn Oregonians land for something that Oregonians do not want.
This pipeline should not happen period. The safety requirements are have shown time and again to be too low for true public and wildlife safety. The companies that are interested in this project have every capitalistic desire to build a cheap pipeline, with thin pies, few welds, and a host of other cost-saving measures. Pipelines blow up, and the FERC should consider this impact as an unacceptable impact.
This proposed pipeline will also create a huge clearcut through endangered species wildlife habitat along 75 miles of public forest. Southern Oregon, over 400 waterways will have their critical stream-side vegetation removed, and the FERC fails to include this as a major negative impact when describing the project to the public. The Endangered Species Act is one of our nations strongest environmental

IND331-1

IND331-2

IND331-3

IND331-4

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IND331-6

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IND331-8

IND331-9

IND331 Maria Farinacci, Eugene, OR

- IND331-1 The EIS does not fail to disclose impacts to watersheds (see section 4.4). Effects on wildlife are disclosed in section 4.6. Social and economic effects are addressed in section 4.9.2.3. The EIS does not violate the NEPA, and was produced in accordance with the CEQ implementing regulations at 40 CFR 1500-1508. Compliance with the ESA is discussed in section 4.7.
- IND331-2 See the response to IND1-3.
- IND331-3 See the response to IND1-1. If LNG is transported to Asia and natural gas is used in place of burning coal to generate power, it may indeed reduce emissions and the potential for global climate change.
- IND331-4 See the response to IND1-2.
- IND331-5 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.
- IND331-6 See the response to IND6-2.
- IND331-7 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947.
- IND331-8 Safety is addressed in section 4.13 of the EIS. The DOT regulates pipeline design and standards.
- IND331-9 Effects on endangered species are addressed in section 4.7, stream crossings and the effects on water and fish in sections 4.4.2.2 and 4.6.2.3, respectively. Impacts on forest are addressed in section 4.5.

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laws, and this project will have major impacts to our forests and streams that are home to the spotted owl, marbled murrelet, and the coho salmon. The FERC also does not consider the impact that this project will have on the tribal peoples of the area around the pipeline. The land provides a way and a spiritual significant to these and many other peoples in this nation, and this pipeline is not only impacting these people, but destroying a way of life. These cultures are endangered and not recognized as such by the FERC. The Treaty rights of the indigenous nations in this area, must be considered by the FERC. The commenting period of 30 days to not only read but understand 5000 pages of a DEIS is unacceptable. This project affects more people that have access to the Internet and other forms of information gathering to accurately understand and weigh in on this DEIS. The FERC must accurately educate themselves and the public on the real impacts and cancel the Jordan Cove LNG Terminal and Pipeline.

Concerned,
Maria Farinacci

Naturalist

IND331-10

IND331-11

IND331 Continued, page 2 of 2

IND331-10 FERC has consulted with tribes in the area. See section 4.11.1.2.

IND331-11 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

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IND332

Neal Hadley, Roseburg, OR.
Docket # CP13-483
Docket # CP13-492

Input for the Jordan Cove/Pacific Connector LNG project:

I oppose the construction and use of this project for the following reasons. Regulation of a natural resource like fossil fuels must consider wise use as to the rate and optimization of its liquidation. We needn't impatiently mine it, it can be a lasting resource. Technology is developing at rapid pace, as shown by the boom brought by drilling and fracturing advances. Technology will change the dirty, climate-impacting processes we use to bring LNG into use today. These reserves can be made a secure energy source for America in the future, free of the carbon dioxide emissions and leaking methane pollution experienced now. Currently, LNG is at best a transition fuel, a temporary bridge to a future clean energy economy; yet this infrastructure will be a long-lived edifice in need of use, a further millstone slowing our moves forward as well as being a physical disability to local land use and the natural aquatic and terrestrial communities.

IND332-1

IND332-2

IND332 Neal Hadley, Roseburg, OR

- IND332-1 The FERC does not regulate the exploration and production of natural gas.
- IND332-2 Project-related impacts on land use is discussed in section 4.1; aquatic and terrestrial wildlife are discussed in section 4.6.

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IND333

Stacey McLaughlin

February 7, 2015

Kimberly Bose, Secretary
FERC
888 First Street, NE
Room 1 A
Washington, DC 20426

Re: Docket Numbers: CP 13-483 and CP 13-492

Dear Ms. Bose:

I am a property owner affected by the Pacific Connector Gas Pipeline. I am a citizen affected by the Jordan Cove LNG Energy Project. My property will be subject to eminent domain by a foreign corporation for private shareholder profits. I have read the two volume Draft Environmental Impact Statement (DEIS) and many of the appendices for the Jordan Cove and Pacific Connector projects slated for Southern Oregon.

I have not read the Biological Assessment that is frequently referred to in the DEIS. The Biological Assessment has not been completed and has not been a part of the FERC review in preparing the DEIS. The Biological Assessment was not made available to the public to allow for adequate review because it is not available. The release of the DEIS without sufficient information available to conduct a comprehensive review is a negligent and presumptuous action by FERC. In integrity based permitting environments, that include transparency and honesty this DEIS would be withdrawn and issued when it is actually a usable Draft Environmental Impact Statement.

FERC is charged with issuing permits, not denying them. FERC is not a government entity and is funded by the very industry asking it to issue the permits. The Federal Energy Regulatory Commission is made up of former industry officials who still have ties to the industry. On January 27, 2015, in an address to the National Press Club, FERC Chair Cheryl LaFleur says, "I am more or less an energy lifer, because I've been in the energy world for more than 30 years." Before becoming a Commissioner Phillip Moeller headed the Washington, D.C. office of Alliant Energy Corporation and before that worked for the Calpine Corporation's office in Washington, D.C. Commissioner Tony Clark was active in state and regional efforts to develop North Dakota's vast energy exporting potential oversaw regulatory proceedings that permitted more than \$5.5 billion in new investment in North Dakota through expanded coal and oil and gas infrastructure. How many more foxes can you get in FERC's henhouse?

799 Glory Lane • Myrtle Creek, Oregon • 97457 • smclaughlin@ymail.com

IND333 Stacey McLaughlin,

IND333-1 The FERC's BA was placed into the public record on February 24, 2015. It is available for review by anyone through the eLibrary feature of the FERC's internet page (www.ferc.gov). There is no requirement under the ESA that the BA should be released in conjunction with a DEIS. The findings of the BA are summarized in section 4.7 of the EIS.

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FERC has *never denied* an oil or gas infrastructure permit (unless it was withdrawn). Given these facts, I am subjugated before I even put pen to paper to make a single comment. FERC's evaluative process and its mission to issue permits, at all costs, is wrought with deception and so suspect it can only be described as corrupt and fraudulent.

Moreover, responding to the DEIS and pointing out what FERC missed or has fallen short on (and it is significant) will simply make the issuance of a permit easier. This seems incongruent and contrary for any citizen who is opposed to the Jordan Cove LNG Energy Project and the Pacific Connector Gas Pipeline from ever coming into being because of its cumulative impacts on the Southern Oregon environment, and dare I point out the entire planet. Which FERC has failed to adequately address, shrugs off as having no cumulative impacts, and pronounces that everything destructive can be mitigated. "Really everything can be mitigated FERC says, trust us." Yes, trust you. Let us revisit a previous paragraph where it is identified that former energy industry officials who now sit as Commissioners are charged with issuing permits to the people they used to work for and with and who now provide the money to pay their salaries. Yes, trust indeed.

It is common knowledge that the Jordan Cove LNG Energy project will become the biggest emitter of green house gasses in the State of Oregon once the Boardman Coal Fired Power Plant is closed in four years. However, FERC says, it is impossible to quantify the impacts that the emissions of GHG from construction and operation that Jordan Cove and Pacific Connector would have on climate change. FERC says, "it is not within the scope of our jurisdictional review to consider impacts of say, *fracking* on the environment when we are considering the Jordan Cove and Pacific Connector Gas Pipeline." Yet, in her address before the National Press Club, Chairman LaFleur says, "In the case of gas pipelines and gas compressor stations, FERC is the one who does the environmental review, permits them and decides the rates...we are blessed to have a wide range of engineers and scientists and we look at a wide range of environmental issues: water, soil, geology, fish and wildlife, and others. ***And we also look at air quality including greenhouse gas emissions.***"

How can any reasonable person separate *fracking* from natural gas transmission, liquefaction, and export, especially those blessed scientists? Let us once again quote Chairman LaFleur, "We're very fortunate to have abundant and relatively affordable domestic natural gas. If we didn't, if we were where we thought we were 20 years ago, the gas was in the ground." But our review is project specific and confined to the information in the docket. ***Speculating about unquantifiable impacts is not part of the process.***

According to the International Panel on Climate Change, the impacts are very quantifiable. FERC avoids the analysis and study when it comes to the environment and climate change; however, it is quite willing to speculate about the unquantifiable impacts of economics. Is this avoidance resultant from hesitancy to displease FERC funders when it comes to the environment as it will undoubtedly shed a rather dim light on any environmental advantages to constructing the project? Yet, while projecting economics, market demand, finance rates, etc., Chairman LaFleur states, "FERC has a role and we have to work to facilitate participation of new resources in the markets we have jurisdiction over." *Fracking* though is not a consideration in the DEIS in addressing cumulative impacts. FERC can speculate on the unquantifiable impacts of economics but not on the environment. How

IND333-2

IND333 Continued, page 2 of 5

IND333-2 See the responses to IND1-1 and IND6-1.

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can this evaluation be so skewed as to only support unquantifiable impacts that favor the applicant?

IND333-3
Cont.

The DEIS states, "Climate change is the modification of climate over time, whether due to natural causes or as a result of human activities. Climate change cannot be represented by single annual events or individual anomalies. For example, a single large flood event or a particularly hot summer is not an indication of climate change. However, unusually frequent or severe flooding, or several consecutive years of abnormally hot summers over a large region may be indicative of climate change." The DEIS further offers, "combustion of fossil fuels (coal, petroleum, and natural gas) combined with agriculture and clearing of forests is primarily responsible for the accumulation of GHG." This project is all about NATURAL GAS, extracting it, liquefying it, and burning it and clearing forests to construct it.

Natural gas leaks methane. Methane that reaches the atmosphere unburned contributes to global warming more than the same amount of CO2. How much more? Scientists have developed the concept of "Global Warming Potential" (GWP) to try to answer this question. The argument is complicated because while CH4 warms the planet far more than CO2, it stays in the atmosphere for much less time. A typical molecule of CO2 remains in the atmosphere about 10 times longer than a molecule of CH4. In their Fifth Assessment Report the Intergovernmental Panel on Climate Change estimated that the GWP for methane is 34 times that of CO2 over the span of 100 years; However, when the time frame is changed to 20 years, the GWP increases to 86!

IND333-4

The DEIS goes on to say, "Although the Project emissions would contribute to the overall amount of atmospheric GHG, it is impossible to quantify the impacts that the emissions of GHG from construction and operation of the Project would have on climate change." Clearly that is an untrue statement. The International Panel on Climate Change, and the United States Global Change Research Program seem to have figured out that continued use of fossil fuels is not in the best interests of any living inhabitant or system on Planet Earth. Yet, FERC does not.

Under Section 3 of the Natural Gas Act (NGA) the commission considers as part of its decision to authorize natural gas facilities, all factors bearing on the public interest. Specifically regarding whether to authorize natural gas facilities used for exportation, the Commission would authorize the proposal unless it finds the proposed facilities would not be consistent with the public interest.

Under Section 7 of the NGA, the Commission determines whether interstate natural gas transportation facilities are in the public convenience and necessity and, if so, grants a Certificate to construct and operate them. The Commission bases its decision on technical competence, financing rates, market demand, gas supply, environmental impact, long-term feasibility, and other issues concerning a proposed project.

Therefore, the Commission must consider not only technical competence, finance rates, market demand, gas supply, environmental impact, long-term feasibility, it must address all other issues and factors raised by the public in consideration of "public interest," as it

IND333-1

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IND333 Continued, page 3 of 5

IND333-3 The Project involves the transportation of natural gas to Coos Bay where it would be liquefied and exported. It does not include extracting gas. The FERC does not regulate the exploration, production, or gathering of natural gas (see section 1.4.4 of the EIS). See the response to IND1-1 on climate change.

IND333-4 See the responses to IND 1-1, IND5-2, and IND6-1. The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. The Commission will determine public benefits in its Project Order. The criteria the Commission would use in making its decision are outlined in its "Certificate Policy Statement" (see Certification of New Interstate Natural Gas Pipeline Facilities, 88 FERC 61,227 [1999], clarified in 90 FERC 61,128, and further clarified in 92 61,094 [2000]).

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pertains to this project including and not limited to the overt and majority Southern Oregon population opposition to the Jordan Cove Project and the Pacific Connector Gas Pipeline for many reasons such as: 1) the long term affect and effect of natural gas extraction (fracking) on the health of a community; 2) its impact on the global public through the resultant increase in global warming by the continued use of fossil fuels; 3) the increase of methane gas into the atmosphere and the effect of climate change resultant from extraction methods and rising incidents of pipeline leaks and explosions; 4) The obvious illegality of violations of personal private property rights and the condemnation of United States Citizens' property to benefit a foreign for-profit corporation; 5) The Commission must clearly delineate what public benefit exists by considering these factors. Once considered, the evidence that this project is not necessary is the only logical conclusion that FERC can come to. The Commission must also base its decision on if there is a public benefit for U.S. citizens from Veresen, a Canadian company, building a terminal to export gas to Asia.

IND333-4
(cont.)

The DEIS tell us (1-20) the public benefit determination is entirely within the hands of the Department of Energy (DOE), and the DOE has already made a determination that Jordan Cove would have a public benefit. However, that DOE determination does not allow FERC to ignore the impacts to the human environment in the EIS. NEPA regulations still require FERC to determine how much of a public benefit this project provides to U.S. citizens. As the DEIS says (3-63), it is "The Commission that will consider the need and public benefit of this Project."

IND333-5

The DEIS also says at 6-163: "A FERC Certificate would verify that the Project has a public need and provides significant public benefit." Therefore, FERC must consider, and document their findings, what the public benefit is of this project. FERC must make their own determination and justify it in the EIS. The DEIS confirms this when it says: "The Commission will consider the need and public benefit of this project when making its decision on whether or not to authorize it..."¹⁵

FERC has a legal obligation to acknowledge in the EIS that the overwhelming majority population of U.S. Citizens will not benefit from the profits of a foreign corporation. U.S. citizens do not benefit from the profits of a corporation in a foreign country. Little of the money made by Veresen on this project will actually trickle down to Oregonians. Landowners stretched across the southern part of the state will be made poorer as a result of land condemnations, lowered property values, and unjust and unequal compensatory remuneration when compared to the profits a foreign for-profit corporation. A corporation that stands to gain at their expense and detriment for having their land condemned with inadequate compensation and lowered land values. Taxes and enticement payments offered to local governments and other local community interests are diminutive from a budget perspective and can in no way measure up to the increased cost of emergency services. Dollars offered to local counties are miniscule compared to their budgets and will likely not even cover the actual expenses of increasing emergency services.

IND333-6

The U.S. Constitution states that no citizen shall be deprived of life, liberty, or property without due process of law; nor shall private property be taken for public use, without just

¹⁵ DEIS Appendix H, page 15.

IND333 Continued, page 4 of 5

IND333-5 The EIS does assess the impact the Project may have on the human and natural environment. The EIS does not make a finding of public benefit. That determination would be made in the Commission Order, as stated in section 1.3 of the EIS, and noted in our response above to IND333-4.

IND333-6 The Commission Order will make the finding of public benefit, not the EIS.

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compensation. In the case of the Jordan Cove LNG project and the Pacific Connector Gas Pipeline project the primary purpose of the project is economic benefit for a foreign corporation; the taking of private property is not for public benefit and use such as improvements to or development of new highway, electrical, or water systems. Exporting LNG to competing foreign interests in Asia by another foreign corporation at the expense of U.S. citizens cannot be determined in the public interest. Allowing the use of eminent domain by private corporations for private benefit and gain is not the intent of the NGA or the Constitution of the United States. Allowing Pacific Connector Gas Pipeline to determine and set property values of private landowners for their own benefit and gain is not "just compensation."

IND333-4

Oregon will not substantially benefit from the inflated number of 145 permanent jobs projected for the Jordan Cove LNG project. FERC is required to consider alternatives and statistically, sustainable and renewable energy jobs, are a better alternative than fossil fuel jobs. This information is not included or considered in the DEIS or the Socio-Economic data provided by the applicant or it would acknowledge the shortage of solar system installation businesses and opportunities that exist in Southern Oregon.

IND333-8

More than 90% of the private landowners along the 230-mile pipeline route declined to participate in the Pacific Connector Gas Pipeline Project when initial offers were made along with overt threats of condemnation in the summer of 2013. Landowners were also threatened with an information sheet outlining their responsibility for legal fees once Pacific Connector condemns the land they unequivocally stated they would receive through Eminent Domain.

FERC has a responsibility in determining public need and necessity and must examine facts, information and data beyond just the "want" of the applicant. The public impacts and "want" must be considered equally. It is unequivocally clear the public does not "want" the project and the information contained in this document demonstrates sufficient facts, information and data that support denial of a permit for Docket Numbers: CP 13-483 and CP 13-492.

IND333-9

Sincerely,

Stacey McLaughlin

Stacey McLaughlin

799 Glory Lane • Myrtle Creek, Oregon • 97457 • smclaughlin@gmail.com

IND333 Continued, page 5 of 5

- IND333-7 See the responses to IND1-3 and IND3-4. As stated in section 1.4.3.3 of the EIS, the DOE determines the public benefit of exporting LNG. The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947.
- IND333-8 The economic benefits of the Project are discussed in section 4.9 of the EIS. Alternatives are considered in Chapter 3. The scope of the Project does not include evaluating the shortage of solar system installation business in Southern Oregon.
- IND333-9 The Commission will determine public need in its Project Order.

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IND334

February 12, 2015

Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington DC 20426

RE: Draft Environmental Impact Statement for Jordan Cove/Pacific Connector LNG
proposal (Docket Number CP13-483-000 and CP13-492-000)

Dear Secretary Bose,

I own approximately 2,300 acres in Douglas County, Oregon. This pipeline is
proposed to cross my property for approximately two miles in two different places,
one by the river and one by my residence.

The gas company has offered me \$14,000 as a one time payment to permanently
change my way of life and the use of my land against my will so that they can benefit
at my expense. I have worked my whole life to have this ranch and my government
should not allow a Canadian gas company to take it away from me and my family.

I built this economic unit for my kids and grandkids to provide a sustainable future
for them. This proposal does nothing but harm my family and the long-term
sustainability of our ranching operation.

I have already spent far more than \$14,000 in time over the years dealing with this
proposal that threatens to take my private property. They have upset my life for
seven years for a measly amount of money for a project that would not bring any
economic good to people like me. To disrupt my life and take my property for a few
temporary jobs so that a Canadian company can ship gas overseas is an
unacceptable use of eminent domain.

I took the time to travel to and testify at five of the six FERC hearings in Oregon
because this is so important to me. My testimony was recorded and I want to make
sure that those recordings are part of the record for this project.

This project is not in the public interest and you should not grant a certificate for
this company to use eminent domain and steal my land.

Bill Gow
4993 Clarks Branch Road
Roseburg, Oregon 97470

IND334-1

IND334-2

IND334 Bill Gow, Roseburg, OR

IND334-1 The FERC would not allow any company to take your ranch away from you. However, if the Commission approves the Pacific Connector Pipeline Project, it would allow the company to acquire an easement across a portion of your ranch lands. We hope that you will reach a mutual agreement with the company for fair compensation for this easement. A buried welded-steel pipeline should not harm your family; nor should it impact the long-term sustainability of your ranching operations. Once the surface is properly restored to its pre-construction condition and use, you should be able to graze livestock on top of the pipeline corridor.

IND334-2 The Commission would determine public interest in its Project Order. The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947.

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IND335

IND335 Shirley Weathers, Eagle Point, OR

February 12, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Draft Environmental Impact Statement for the Jordan Cove Energy Project LP (Docket No. CP13-484-000) and Pacific Connector Gas Pipeline LP (Docket No. CP13-492-000)

Dear Ms. Bose:

I am writing to express and explain my opposition to the above project (herein referred to as JCE & PCGP) and to urge the Federal Energy Regulatory Commission to deny approval and certification of the combined projects. My issues of concern are as follows:

There is no longer any reasonable doubt that any and all development and use of fossil fuels, including natural gas, is contributing to global warming and the attendant climate and environmental impacts of this are all negative. I understand fully that the oil and gas industry is desperate to continue to profit from projects such as JCE & PCGP and that applications designed to accomplish that end abound. This will continue as long as FERC and other state and federal entities are willing to approve them. But the people of Oregon, in the nation as a whole, and around the globe, as well as the best science and most political leaders, including President Obama, are calling for efforts to change our course. We need to move as quickly and aggressively as we can to halt the march towards increasing greenhouse gas emission. Approving new, proposed projects such as this one is absolutely the wrong way to go and the time to stop is now.

It is alarming to read that FERC staff finds approval of the JCE & PCGP justifiable, even after stating that, "Climate change has modified the environment in the area around the Project and is projected to cause additional changes to the project area." (DEIS, p. 4-1041) Staff continues,

Previous impacts on historical baseline climate and as well as projected climate change impacts that could affect the project area are identified below:

- declining springtime snowpack leads to reduced summer streamflows, straining water supplies;
- changes in the timing of streamflow related to changing snowmelt have been observed and will continue, reducing the supply of water for many competing demands and may cause ecological and socioeconomic problems;
- increased insect outbreaks, wildfires, and changing species composition in forests will pose challenges for ecosystems and the forest products industry;
- salmon and other coldwater species will experience additional stresses as a result of rising water temperatures and declining summer streamflows;

IND335-1

IND335-2

IND335-1 Comment noted.

IND335-2 See response to IND1-1. The EIS and FERC staff did not recommend approval of the Project. The EIS is not a decision document. The Commission will decide whether or not to authorize this Project in an Order which has not yet been issued.

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- sea-level rise along vulnerable coastlines will result in increased erosion and the loss of land and cause threats to infrastructure and habitat;
- average temperatures have risen 1.5°F over the last century and are projected to increase another 3 to 10°F during this century;
- a mid-range estimate of relative sea-level rise for the Puget Sound basin is about 13 inches by 2100; • declines in dissolved oxygen in streams and lakes have caused fish kills and loss of aquatic species diversity;
- the oceans are currently absorbing about a quarter of the CO2 emitted to the atmosphere annually and are becoming more acidic as a result, leading to concerns about potential impacts on marine ecosystems; and
- coastal water warming may lead to the transport of invasive species through BWE during ship transit.

In my view, a conclusion of insignificant negative impact is unsupported, even if considering only—as the above listing does—the project’s local impacts on climate change. The actual and potential impacts of the pipeline are not considered—for certain there will be substantial leakage from pipelines and storage tanks. This is a foregone conclusion and proven fact, yet it is ignored. Pipeline ruptures, explosions, and fires in the extensively wooded areas along the pipeline’s route should be expected and squarely accounted for in the EIS, not dismissed as catastrophic events outside the realm of consideration. More alarming still, the Draft EIS totally ignores the very significant negative effects on climate change of the combined natural gas extraction through fracking and production in western U.S. and Canadian gas fields where the product is derived, as well as methane leakage during storage and transport. The Commission should depart from the position of the Draft EIS of looking at this project in isolation or as if there is an acceptable level of increase in GHG emission or both.

On top of an irresponsible approach to climate change, the Draft EIS fails to demonstrate that there is a significant public benefit to Oregonians from this project. I will not claim to have read the entire document; however, the Executive Summary outlines really only one benefit: short-term jobs. From what I have read, the promise of big payrolls and everything that goes with them has attracted support in the depressed Coos Bay area. I would never argue that jobs are not important. But having moved here only a short time ago from almost 20 years in Utah’s Uintah Basin—where an oil boom is just beginning to bust right now—the socio-economic factors considered in the Draft EIS are simplistic and woefully inadequate. Realities that are left out are likely to include the following:

- The majority of the jobs and bulk of the payrolls will go to non-local people.
- Referencing housing availability to accommodate the many non-locals within a 50 mile radius (100 mile daily round-trips) is not practical.
- Assuming project jobs will pay higher than average local salaries, local people working at non-project jobs will find themselves unable to afford rental housing as prices for those units go up as far as the market will bear. If anyone will be looking for housing between 25 and 50 miles away, it will be local workers with minimal wage service jobs.
- It is difficult to believe that the applicant really intends to provide the amount of shuttle transportation described. Likely the actual impact will be dramatic increases in traffic.

IND335 Continued, page 2 of 4

- IND335-3 All the conclusions in the EIS are supported by facts. Impacts from construction and operation of the pipeline were considered in the EIS. See response to IND5-2.
- IND335-4 It is highly unlikely that the pipeline would rupture, explode, or cause a forest fire. See section 4.13 for a discussion of pipeline safety.
- IND335-5 See the responses to IND1-3 and IND6-1.
- IND335-6 Comment noted, see the response to IND1-1.
- IND335-7 The EIS evaluates the environmental effects of the Project. It does not determine need. The Commission will make a determination of public benefit in the Project Order.
- IND335-8 See discussion in section 4.9 of the EIS. About half of the construction jobs would go to local labor. There is adequate housing for the anticipated construction work force. The companies are committed to busing its employees to the job sites.

IND335-3

IND335-4

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IND335-8

- Whatever role tourism currently plays in the nearby area will likely decline dramatically because project workers will wind up being housed in hotels, motels, guest houses, and whatever rooms are available. Prices for rooms will go up throughout construction for the same reason.
- Pressures on local services—hospitals, schools, social services, etc.—will become intense.
- Any new construction or other development that responds to the increased demand during the construction period will plummet in value and utility once it ends.
- An additional unfortunate byproduct is likely to be polarization between the community that believes it will see only benefits from the project and the rest of the state which sees only detriment.

IND335-8
Cont'd

The socio-economic impacts of projects even less massive than this need to be considered objectively, in depth, and over the long-term to provide an adequate picture. The description in the Draft EIS fails in this regard, painting a rosey, one-sided picture of that part of the project. It amounts to more of a marketing pitch commonly by proponents to excite vulnerable communities, leaving them in the lurch when the job is done. So in sum, I would question whether there is, indeed, even one true public benefit to this project.

IND335-9

The premise provided by FERC staff for concluding less-than-significant negative environmental impact is flawed. Chapter 4 of the FERC Draft EIS deals with potential Environmental Impacts of the Project. At the beginning of the chapter, the staff discusses their review process for that section. They indicate that they found negative potential impacts. They said that they "evaluated [the applicant's] proposed measures to determine if they would adequately mitigate impacts." They clearly found a number of deficiencies. Regarding those, staff stated that, "In cases where we felt the proposed measures were less than adequate, where no mitigation measures were proposed, or where final design details requiring Commission review have yet to be developed, and to ensure that appropriate design requirements are implemented, we have added our recommendations to reduce impacts . . . We will recommend that these measures be included as specific environmental conditions attached as an appendix to any Commission Order authorizing this Project." They go on to say that their conclusions—presumably including that the Project will have less-than-significant negative impacts—are based on their assumptions that

IND335-10

- Jordan Cove and Pacific Connector would comply with all applicable laws and regulations;
- the proposed facilities would be constructed as described in chapter 2 of this EIS; and
- Jordan Cove and Pacific Connector would implement the mitigation measures included in their respective applications and supplemental filings to the FERC.

I applaud the intent of the FERC staff for setting a higher bar to protect against negative environmental consequences of this Project than the applicant company, but I find the contention untenable that significant negative environmental impacts can be rendered insignificant by adding more *mitigation plans* or by referencing *monitoring and enforcement regulations* of this or that understaffed entity. The process by which FERC staff becomes satisfied that negative environmental impacts will be insignificant is at least naive and at worst, bureaucratic prevarication. Here are my additional concerns:

IND335-11

- The large number of inadequacies FERC staff acknowledged should at least raise suspicion that the project designers, working feverishly to reverse focus 180 degrees from an import project to

IND335-12

IND335 Continued, page 3 of 4

IND335-9 Socioeconomic effects are considered objectively in section 4.9.

IND335-10 Our conclusions are supported by facts.

IND335-11 Mitigation measures would reduce most environmental impacts to non-significant levels.

IND335-12 It is common practice for Commission Orders to contain environmental conditions. Those conditions could include additional mitigation and studies that would protect environmental resources.

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an export project to remain competitive, didn't do their homework enough to cover the bases. Should FERC approve a project that is only partially researched as long as the applicant agrees to adopt staff's recommendations?

- Some mitigation plans seem wholly insufficient, despite the importance of the issue they purport to address. For example, a solution to steep scarred areas along the pipeline route to prevent mudslides and erosion prior to regrowth of vegetation is applying weed-free straw—acres and acres of it. Does FERC staff have a way to verify that that material can be obtained? It's doubtful. No alternative was proposed. The negative impacts here seem significant.
- What is FERC's procedure to ascertain the financial capability of an applicant to implement a proposed project to safe and adequate standards as proposed? What guarantee will FERC have that, if the applicant agrees to implement all of the staff recommendations—recalling that staff's finding of insignificant negative impacts was contingent on implementation—the applicant has sufficient additional financial resources to pay for that additional work and mitigation and for it to be done right? What enforcement capability do the various governmental entities that FERC staff assumes will monitor the applicant's faithful implementation of original stated project standards plus additional required processes and mitigations?
- What happens—to our state. . . to our precious water, air, fish, wildlife, farms, communities—if, once the Project is actually being implemented, the company's already enormous budget can't realistically stretch to cover existing mitigation costs, let alone the new ones that would result from implementing pages and pages of FERC staff's recommendations. The current comment period will, in my opinion, surface many additional issues that FERC staff did not address. If addressed in the final approval, more costs. Cutting corners—a practice that has been a well-documented solution to budgetary shortfalls or even to swell the corporate bottom line—could be disastrous for our state.

IND335-12
Cont'd

IND335-13

IND335-14

IND335-15

The real beneficiaries of this project are oil and gas developers and their shareholders with corporate headquarters in Canada, Denver, and various Texas cities. As their goal of finding a market for natural gas surpluses is met, consumers throughout Oregon and the nation will see their natural gas costs increase. Oregonians will suffer in various ways as our environment, sense of security, and life style are negatively impacted with no appreciable benefit in exchange. We urge the Commission to deny the JCE & PCGP application. It is not in the best interests of Oregon, the nation, or the world.

Thank you for your consideration of this comment.

Sincerely,

Shirley Weathers, PhD.
1020 Butte Falls Highway
Eagle Point, Oregon 97524-4454
435-548-2630
walsh.weathers@gmail.com

IND335 Continued, page 4 of 4

IND335-13 Certified weed-free materials are available through commercial sources and are the standard on the BLM and Forest Service projects throughout the region.

IND335-14 The Commission Order requires the company to implement all mitigation recommendations found in the EIS. Non-compliance may result in fines up to \$1 million a day in accordance with EPACT05.

IND335-15 As explained in section 4.9, the state of Oregon would have economic benefits from the Project. Most environmental impacts would be temporary or short-term. Water, air, fish, wildlife, and farms would be protected through mitigation programs as discussed in the EIS. All comments on the DEIS are addressed in the FEIS.

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IND336

Jeanie Jenks, Tiller, OR.

This project is not in the best interests of the public due to the following major reasons:

- 1) Impact on private lands - A for-profit pipeline built for resource export is not a National priority for energy security and MUST NOT be built using Eminent Domain for property acquisition - this violates the basic requirements of eminent domain.
- 2) The analysis of this project failed to consider the true dangers of this project to increase climate change problems. The burning of natural gas necessary to power the cryogenic facility would release large quantities of CO2 and create a major source of carbon in the US, thus violating recent state and national goals for emissions reduction. FERC fails to fully consider and analyze these impacts in the Draft EIS.
- 3) The analysis fails to consider the impacts of the LNG terminal being built in the earthquake sub-duction and tsunami zone. The potential catastrophic risk to the Coos Bay/ North Bend area cannot be fully mitigated, particularly due to the location of the facility near flight-paths to and from a regional airport. The analysis fails to describe what would happen to the 2 80 million gallon tanks of liquefied natural gas should the power plant stop working and the back-up power failure such as happened in Fukushima, Japan.
- 4) Impact on water resources and salmon - this project would harm the habitat of 400 waterways in watersheds that are already threatened with warming water and sediment that cannot be fully mitigated. The analysis fails to fully consider impacts to forest and water resources used by endangered species such as coho salmon.

IND336-1

IND336-2

IND336-3

IND336-4

IND336 Jeanie Jenks, Tiller, OR

- IND336-1 The Commission would consider if there is a public benefit in its Project Order. The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947.
- IND336-2 See the response to IND1-1.
- IND336-3 See the response to IND1-4 for earthquake risks. Other risks to the LNG facility are considered in section 4.13.
- IND336-4 Impacts on water resources are addressed in section 4.4; impacts on aquatic resources in 4.6; and impacts on threatened and endangered species in 4.7.

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IND337

Mary Ann Hansen, Roseburg, OR.

Comments on FERC DRAFT EIS

EMINENT DOMAIN:

Eminent Domain should not be used for the good of a cooperation, especially a foreign cooperation if the residents of the affected area are not getting ample benefits or the proposed project creates more negative than positive results for said area. A need for the proposed project must be proven and provided.

SAFETY:

The terminal is proposed to be built in an active Tsunami zone. The highly explosive tankers would be docked at the end of an airport runway, which is an accident or terrorist action begging to happen.

ENVIRONMENT:

More use of polluting fossil fuel would be encouraged in Asia. Highly negative environmental effects from fracking, shipping, converting natural gas to liquidified natural gas (LNG) and back again to natural gas, spraying herbicides & pesticides along the pipeline right of ways, crossing rivers & their tributaries, etc. will have negative environmental impacts. The habitats of many land & aquatic plants & animals, several already on the endangered species list, will be damaged. There is a native flower that grows no where else in the world except for a small area near Myrtle Creek, OR & the pipeline is proposed to go thru one of the biggest areas of it's small habitat which will swipe it out in that area.

JOBS:

The Pacific Connector Pipeline Company has stated that they would not hire Oregonians to build the pipeline because "Oregonians don't know how to build pipelines." More jobs will be lost than gained. For high security reasons, saltwater fishermen will not be able to go out in their boats while a ship is coming into the harbor, while it is sitting in the harbor, or while it is leaving (this could take days for each ship).

Other job losses: recreation related, fresh water fishing, tourism, organic farming, logging while the timber being cut for the pipeline is flooding the market, etc.

SAFETY ON THE PIPELINE:

For nearly ten years Pacific Connector staff said they would be on the site of any pipeline accident within an hour. Recently when their new lawyer was asked how soon would they be at the sight of any pipeline accident and he said "Well you are all Boon Dockers here so we can't get to you for at least 3 hours!" They should not be planning to build it in the Boon Docks. That says something about why this project is proposed in this area.

ECONOMICS :

The USA will be thrown on the World natural gas market. We would be paying nearly 5 times more than we do now for natural gas. The aforementioned industries and job losses, and extra spending on safety methods, I.e.(forest fire fighters will have to be trained to fight gas fires on new expense equipment) will have a negative effect on the economy especially in the 4 counties directly effected in Oregon.

They are not proposing to build this project it in Canada, because Canadian laws won't allow it. Something is wrong with this whole scenario.

Thanks, Mary Ann Hansen, ESPN Planning

IND337-1

IND337-2

IND337-3

IND337-4

IND337-5

IND337-6

IND337 Mary Ann Hansen, Roseburg, OR

- IND337-1 See the response to IND336-1.
- IND337-2 The terminal is proposed to be built in an active Tsunami zone. The highly explosive tankers would be docked at the end of an airport runway, which is an accident or terrorist action begging to happen.
- IND337-3 If LNG is shipped to Asia, and displaces the burning of coal at power plants, there would be less air emissions globally. See response to IND6-1. Pacific Connector does not intend to spray any pesticides along the right-of-way, and herbicides would mostly be applied manually in limited and specific areas. Impacts on waterbodies are addressed in section 4.4 of the EIS; impacts on habitats in section 4.5. Federally listed species are addressed in section 4.7.1.6.
- IND337-4 Employment is discussed in section 4.9. Pacific Connector has indicated that about half the temporary construction labor force would be local (coming from the state of Oregon). No jobs would be lost because of the Project. Local fishing boats would only be delayed a short period of time (less than 30 minutes) when an LNG vessel passes in the Coos Bay navigation channel.
- IND337-5 Section 4.13 of the EIS addresses safety.
- IND337-6 A 2012 study by the Energy Information Administration (EIA) of the U.S. Department of Energy (DOE) stated: "...U.S. natural gas prices are projected to rise over the long run, even before considering the possibility of additional exports." Another 2012 study by NERA Economic Consultants for DOE found that the nation is "...projected to gain net economic benefits from allowing LNG exports."

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To: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission

From: Beverly Segner, Private Citizen

RE: CP13-483-00 and CP13-492-000

Comments regarding the Draft EIS for the above proposed projects

1.3 PURPOSE AND NEED FOR THE PROPOSED PROJECT
Under Section 3 of the NGA, the Commission considers as part of its decision to authorize natural gas facilities, all factors bearing on the public interest.

Comment: The DEIS is insufficient because in this section the applicant provides no specific information about how the project meets the public interest directly or indirectly. While on pg.1-13 paragraph 3 it mentions that the PCPP and JC LNG would supply additional volumes of natural gas to markets in southern Oregon, there are no plans to provide natural gas product to southern Oregon residents for their use or if so, these plans and their implications are not addressed.

In fact, there are significant testimony and reports that should be included here about the detrimental impacts of this project to the population and environment of Southern Oregon both in the construction and operation phases. The applicant also fails to address the dangers to the public interest due to citing a hazardous facility in a populated area and compare it to benefits.

I request that the DEIS be revised to include this information as a comparative analysis.

1.4 PURPOSE AND SCOPE OF THIS ENVIRONMENTAL IMPACT STATEMENT

In addition to complying with the NEPA, our purposes for preparing this EIS include:

- a description and evaluation of reasonable alternatives to the proposed actions that would avoid or minimize adverse effects on the environment;

Comment: Referring to 3.1 No Action Alternative

The DEIS is insufficient because the applicant does not make a reasonable case for the benefits to the public interest for this project AND fails to specifically address the environmental impacts and/or public interest of the No Action Alternative except to say that "**expansion of existing systems or construction of new facilities would result in specific environmental impacts that could be less than, similar to, or greater than those associated with the proposed Project**".

It is not possible for the No Action Alternative to be reasonably evaluated without this information. The analysis of the environmental impacts of other proposed projects needs to include specific details, not merely a general phrase of the obvious. In this instance, it is virtually impossible for the public or any agency to make a measured response to the DEIS and/or for FERC to make an informed decision under the NEPA requirements.

I request that the DEIS be amended to specifically define environmental impacts in a comparative fashion between alternatives as part of the scoping process to allow public comment, particularly, but not only, in relation to the No Action Alternative. The benefit of not moving forward with the proposed projects in each of the domains is an important part of a complete DEIS.

IND338

IND338-1

IND338-2

IND338 Beverly Segner

IND338-1 The purpose of the DEIS is to analyze and disclose the environmental effects of the proposed project. The Commission will address the need for the project in its Public Order.

IND338-2 As stated in section 3.1 of the EIS, if the No Action Alternative was selected, the environmental impacts outlined in the EIS would not occur.

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CEQ regulations explicitly state that the cumulative impacts of a project must be evaluated along with the direct and indirect effects of each alternative. These cumulative impacts and comparisons for each alternative are not present in the DEIS related to the terminal or the pipeline.

IND338-3

1.4.1 Purpose and Scope of the FERC's Action

The Commission may accept the applications in whole or in part, and can attach engineering and environmental conditions to the Order that would be enforceable actions to assure that the proper mitigation measures are implemented prior to the Project going into service.

Comment: Without the specific engineering and environmental conditions explicitly defined in the DEIS, the public is unable to make informed comments about the project. To offer the option to accept the application with conditions developed by FERC at a later date does not allow for appropriate public analysis and comment.

I request that this section of the DEIS be amended to read that the proper mitigation measures are required to be outlined specifically as part of the scoping process in order to allow for public comment and agency input. Without this vital information, the public cannot participate fully in the process as outlined by NEPA. Further, mitigation measures especially when the citing of a noxious facility is proposed need to meticulously address all environmental impacts including socioeconomic and health factors, among others. This DEIS is inadequate in this regard. Orders after the fact of approval and/or construction of such a project do not sufficiently allow public input.

IND338-4

1.4.2 Purpose and Scope of the Actions of the Forest Service, BLM, and Reclamation

Both the BLM and Forest Service have identified suites of "Design Features" or "Project Requirements" to the agencies deem necessary to accomplish goals and objectives of their respective LMPs.

Although these actions (which are described in the BLM and Forest Service plans; see chapter 2) are specific in terms of activity and location, this EIS addresses these in a programmatic fashion. Many of these actions may require additional analyses and surveys before final decisions can be made by the federal land managing agencies.

IND338-5

Comment: Due to the amount of land and the number of service districts impacted including the fact that the PCPP is inconsistent with the LMPs of the BLM Districts and National Forests crossed by the proposed pipeline (not to mention the environmental impact on State and private land), addressing these plans (Design Features and Project Requirements) in a programmatic fashion rather than providing detailed analyses and survey in advance, does not allow the public the opportunity to comment. The need for adjustments to be made in the management plans of these agencies for the lands involved when the public has already approved these plans is a serious cause for pause and public concern. It is not as if the applicant is merely applying to build a facility in an area already meeting existing zoning requirements! This specific information needs to be provided for the DEIS to be complete and for the public to comment.

1.4.3.3 U.S. Department of Energy

Regarding application to the DOE for authorization to export LNG:
In addition, Jordan Cove must file with the DOE copies of long-term contracts for both natural gas supply and the export of LNG.

IND338 Continued, page 2 of 11

IND338-3 Section 4.14 presents the cumulative effects of the Project.

IND338-4 The recommended conditions were provided in section 5.2 of the DEIS, for anyone to comment on.

IND338-5 The design features and project requirements are described in detail in the plans of development submitted by the Pacific Connector as part of their 2013 application. The actions in compensatory mitigation plans of the BLM and Forest Service are described in section 2.1.4 and appendices F, J, and H of the DEIS in sufficient detail to allow for public comment on the actions. The details of the projects would be further defined in subsequent analysis when the projects were ripe for decision and would include opportunities for further public input.

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Comment: Due to the vagaries of the natural gas market, with the change of this applicant's proposal within a 10-year period from an import to an export facility as a perfect example, it seems that this DEIS is incomplete without inclusion of signed copies of long-term contracts for supply of natural gas and the export of LNG. Approving a proposal without such assurance would be irresponsible and not in the public interest. Also, the definition of "long-term" needs to be included in the DEIS as well as confirmation through documentation that this project will meet that expectation. This information needs to be provided for the DEIS to be complete. I request that in the service of the public interest documentation of assurance of the viability of the project be provided in the form of customer contracts which demonstrate a secure financial cost/benefit for this project as part of the DEIS.

IND338-6

1.4.4 Issues Considered Outside the Scope of this EIS

Jordan Cove has not identified the specific vessels that would ship the LNG abroad or the exact customers for the LNG.

Comment: On the one hand, JC is justifying the project due to the benefits to the public of transporting natural gas from other states and exporting the product, yet does not see a need to identify sufficient detail regarding the specific impact of the vessels entering the harbor NOR a responsibility to identify customers in advance. This seems in direct conflict with the public interest and that the DEIS, in spite of the applicant's dismissal of the need to provide this information, is woefully incomplete without it. How can the applicant justify an export facility without identifying the customers?

IND338-7

If the historic policy of the Commission does not include conducting a nation-wide analysis of proposed LNG export terminals than how can FERC responsibly meet the NEPA requirements for implementing the proposed actions or provide a true comparative analysis of the alternatives? This makes the DEIS incomplete by definition.

In addition, it is stated that it is the Commission's historic policy to allow market forces to influence where LNG terminals should be situated; assuming that the locations are environmentally acceptable based on the analysis contained in a project-specific EIS.

Comment: How can a market analysis be conducted without defined relationships with customers for the product?

Companies select the location of their proposed facilities based on market and other factors, and the Commission staff analyzes the environmental impacts of construction and operation of those facilities at the selected locations. Companies would be at risk for the costs of constructing and operating an LNG terminal, as influenced by their own research into economic conditions and market needs.

Comment: While the company may be at risk for the cost of constructing and operating an LNG terminal and pipeline, it is the public that would bear the brunt of these activities and the consequences of an abandoned/failed project. For this reason, the environmental impact of any project, not to mention the proposed creation of a noxious facility that would impact 400 water bodies and be cited in a harbor in an earthquake subduction zone, needs to address the market forces and the sustainability of the market forces over a reasonable time as well as the company's solvency and ability to mitigate impacts. If this is not done as part of the DEIS, it is insufficient.

IND338-8

IND338 Continued, page 3 of 11

IND338-6 The EIS analyzes the environmental effects of the Project as proposed by the applicants. The Commission will evaluate additional information, including markets and need, in its future Order.

IND338-7 The EIS is complete and complies with the CEQ's regulations for implementing the NEPA. The U.S. Congress has not directed the FERC to conduct nation-wide planning. The Commission's Order would discuss public interest and benefits of the Project; and discuss customers for the natural gas.

IND338-8 The companies, not the public, would bear the costs if this Project failed. The Commission Order will address markets. The EIS addresses impacts on waterbodies in section 4.4, and impacts from geological hazards in section 4.2.

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Just because the applicant states that certain issues are outside the scope of its DEIS, does not make it correct. Given the huge and hazardous breadth of this proposal, the DEIS must be meticulous and thorough. According to NEPA a DEIS should include a rigorous exploration and evaluation of all reasonable alternatives including a discussion of the probable beneficial and adverse social, economic, and environmental effects of each alternative. This DEIS by the applicant's own definition does not accomplish this and needs to be amended.

IND338-9

1.5.3.3 U.S. Army Corps of Engineers Review

The COE requested that the EIS address several topics including the "purpose and need for the Project. According to the DEIS: **The purpose and need for the Project are briefly summarized in section 1.3 above.**

IND338-10

Comment: The purpose and need for the project should be far more than a brief summary and ought to encompass a review of all potential alternatives for the DEIS to be complete.

4.8 RECREATION AND VISUAL RESOURCES 4.8.1 Recreation and Public Use Areas

According to the BLM's *Final North Spit Plan*, the public lands managed by the BLM on the North Spit are designed to become the largest and most accessible tract of public green space available for the Coos Bay area communities (BLM 2005). In recognition of the area's value for outdoor recreation, the BLM designated the North Spit as a Shorelands SRMA in its Coos Bay District Resource Management Plan. The BLM counted 27,100 visits to the North Spit between October 1, 2003, and September 31, 2004. The SRMA includes 1,600 acres for OHV use along designated sand roads. These roads are also available to hikers and equestrians. In a typical year, the BLM estimated that about 460 OHVs traveled on the sand road to the North Jetty. The closest developed recreational facility to the Jordan Cove terminal within the SRMA is the BLM boat dock located about 0.8 mile southwest. According to the BLM, about 13,100 vehicles visited the boat dock in a single year, and about 420 boats were launched (BLM 2005).

A survey conducted by the OPRD found that the 15-mile stretch of beach along the ocean from Ten Mile Creek to the mouth of Coos Bay was visited by an average of 38 people on a weekday, and 60 people total on a weekend day (Shelby and Tokarczyk 2002). The main activities of beach visitors in this segment include OHV use (54 percent), relaxing (21 percent), walking (16 percent), and recreational activities with dogs (4 percent). The high OHV use reflects that the northern portion of this segment is within the ODNRA.

Comment: The region effected by the proposed JC facility receives an estimated \$7.7 million in revenue and over 10% of its employment is provided by tourism. In this section, discussing the number of OHV's that travel on the sand road to the North Jetty does not adequately describe the impact the facility would have on the desirability of the whole recreational area to tourists which needs to be addressed. Further, the statistics used in the DEIS in this section date from 2003-2004, over 10 years ago. These statistics need to be updated for the DEIS to be sufficiently describe the environmental impact and the need to include a comparative analysis of the loss of tourism revenue.

IND338-11

The statistics describing the use of a 15-mile stretch of beach adjacent to the JC project cite date to 2002. These statistics need to be updated for the DEIS to sufficiently describe the actual impact of the proposed project. Further, as the construction phase is projected to increase the population to the area by up to 1,800 people including impacting travel across the main entry into North Bend/Coos Bay via HWY 101, averaging the daily use statistics of one stretch of beach does not give a realistic picture of the impact during high tourist season. Presented a different way even with

IND338 Continued, page 4 of 11

IND338-9 Alternatives are discussed in Chapter 3 of the EIS.

IND338-10 The CEQ regulations at Part 1502.13 only require that an EIS should "briefly specify the underlying purpose and need" for a Project; which we have done in section 1.3 of the EIS. The Commissioners will have a broader discussion of purpose and need in their Project Order.

IND338-11 See sections 4.8 and 4.9 of the EIS. The most up-to-date information available was used. Impacts related to workers commuting to the job site on local transportation is discussed in section 4.10 of the EIS.

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the outdated statistics, over 15,000 people utilize this stretch of beach in a year. The question is: how many of them come in the summer months and how will the project in all its phases impact the use of this recreational area?

IND338-11
Cont'd

I ask that the statistics regarding the North Spit, North Jetty, Boat Dock, described in this section be updated in order for the DEIS to be sufficient. Also, that the statistics be presented to demonstrate use of the recreational areas affected during peak use times.

Boating and Fishing

Use of the crabbing, clamming, and angling areas in Coos Bay should not be any more affected by the passage of LNG vessels than they are currently affected by the passage of other deep-draft ships. Crabbing and clamming currently occurs outside the navigation channel and would not likely be affected by an LNG vessel in transit within the waterway to or from the terminal. However, if crabbing, clamming, angling, or scuba diving activities were to occur within the established security zones, those activities would be required to cease and temporarily move out of the way. The Coast Guard and OSMB would continue to remind boaters of their obligation not to impede the deep draft ships, regardless of the cargo. Passive fishing equipment, such as crab pots, would be permitted to remain within the security zone while an LNG vessel is present, though the attending crabbing vessels would be required to vacate (Berg 2008).

Comment:

Throughout the DEIS there are numerous instances where the impact of the project is presented as "minimal". For example, stating that the passage of LNG vessels should not affect crabbing, clamming, and angling areas any more than the current impact of other deep-draft ships is misleading. Other deep-draft ships do not present the security risk or require the security precautions that an LNG vessel necessitates. The DEIS needs to present these risks and impacts in a way that is comparative. For example, with a minimum projection by the applicant of 90 LNG vessels entering the channel per year, with a minimum estimate of 90 minute trips each way, how does this translate to actual hours lost to recreational and commercial use of the bay? The public needs to be able to review and comment on these impacts during the scoping process.

IND338-12

I ask that the DEIS be amended to accurately, specifically and comparatively describe the real-time and actual behavioral responses that will be imposed on recreational boaters, crabbers, and anglers during the passage of an LNG vessel. These same descriptors also need to be provided in regard to impacts on commercial vessels, particularly fishing. I also ask that a map be provided detailing the various placements of an LNG vessel passing through the channel in comparison to required distances for boaters and fishing vessels to meet the requirement to "cease and temporarily move out of the way".

4.9.1.6 Local Infrastructure and Public Services

Medical Facilities

There are three hospitals located in Coos County. The Southern Coos Hospital in Bandon, approximately 31 miles south of the terminal, is licensed for 21 beds, and is designated a critical access hospital as well as a full-service, general acute care hospital. It is ranked as a Level 3 Trauma Center. The Coquille Valley Hospital in Coquille, approximately 25 miles south of the terminal, is licensed for 25 beds, and is ranked as a Level 4 Trauma Center. The Bay Area Hospital in the city of Coos Bay is the closest to Jordan Cove's LNG terminal, approximately 6 miles from the terminal. This facility has 172 beds licensed for acute care, and is rated a Level 3 Trauma Center. We believe that the existing medical facilities in Coos

IND338-12 As stated in section 2.1.1.1 of the EIS it would take an LNG vessel less than two hours to travel from the K-buoy through the Coos Bay navigation channel to the Jordan Cove terminal. As stated in section 4.10.1.1, other boats in the bay may have to wait up to 30 minutes for an LNG vessel to pass. According to ECONorthwest (2012e), if 90 LNG vessels visited the Jordan Cove terminal each year, there would be 60 hours total during a year when an LNG vessel would be present in the waterway (0.68 percent of the time). The sum of the time that LNG vessels may be transiting within the Coos Bay navigation channel would be about 1.3 percent of daylight hours. Thus, it appears that LNG vessel marine traffic to and from the Jordan Cove terminal would have negligible potential to affect recreational boaters and other users of the bay. Clamming and crabbing activities typically occur outside of the existing navigation channel and would not be affected by the passing of an LNG vessel.

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County are adequate to handle the influx of non-local workers during Jordan Cove Project construction, and the additional families that may move to the area during operation. The Jordan Cove Project should not have any significant adverse effects on medical facilities.

Additional reference to TABLE 4.9.26-2 Hospitals in the Counties Crossed by the Pacific Connector Pipeline

As noted above, Pacific Connector has developed a Safety and Security Plan. Measures the company would implement to keep its employees safe include training of on-site personnel in first aid and use of CPR.

Comment:

According to the U.S. Department of Health and Human Services Health Resources and Service Administration, Coos Bay/North Bend is a Primary Care Health Professional Shortage Area and is a Medically Underserved Area/Population. Stating in the DEIS that the existing medical facilities in Coos County are adequate to handle an influx of non-local workers and that the JCP should not have any significant adverse effects on medical facilities completely disregards the current shortage of medical, dental, and mental health professionals in the area.

IND338-13

In comments made for the import facility it was noted that the presence of an LNG terminal in an area having difficulty recruiting physicians as it is, would make Coos County a less desirable place to live and further negatively impact recruitment of qualified health professionals. This was not addressed in the current DEIS nor its impact on health care in the area.

IND338-14

In addition, the Department of Health and Human Services Office of Emergency Medical Services reports there are no hospitals in the region impacted by the proposed JCP/PCP with a Trauma Level Rating higher than III. OEMS describes one of the primary functions of Level III and IV designated facilities as to arrange transfers to facilities that can provide definitive trauma care. Detailed descriptions of the limitations of trauma care available within the vicinity of the proposed JCP and the ramifications of this to the public need to be included in an adequate DEIS.

IND338 Continued, page 6 of 11

IND338-13 We acknowledge that there is a shortage of primary health care professionals currently working in Coos County. County hospitals have ongoing recruitment programs to attract additional family practitioners and internal medicine doctors. The Bay Area Hospital has an internship program for nurses trained at the Southwest Oregon Community College. There are two urgent care clinics in the county that are developing triage procedures. The Jordan Cove terminal complex would have some limited medical facilities for employees. Besides the SORSC, Jordan Cove would have a licensed nurse practitioner stationed in an office within the Administration Building at the South Dune site. Jordan Cove is investigating the possibility of establishing a "walk-in" clinic to meet the medical needs of its employees.

IND338-14 As stated in the response to IND338-13, the Project may result in the addition of medical practitioners to the Coos County.

IND338-15 The FEIS has been updated to correctly identify the level of trauma care available in the vicinity of the Project. See section 4.9.1.6 of the EIS.

It bears mentioning that the hospital closest to the proposed JCP, Bay Area Hospital, has 129 beds and only a Trauma Level III designation. Further, BAH is located on the opposite side of the McCullough Bridge from the proposed facility and if the bridge were compromised, access would be as well. Also located on the south side of the bridge from the proposed facility with an approximate traveling distance of 25-30 miles each are 2 hospitals with Level IV Trauma Care and a total of 44 beds. One of these facilities, the Southern Coos Hospital is inaccurately described in the narrative of the DEIS as a Level III Trauma Center; it actually has only a Level IV designation (see Table 4.9.2.6-2 pg. 4-820). This needs to be corrected. The hospital north of the facility is approximately 26 miles distant and has 16 beds with no trauma level designation. While the distance, location and trauma designation of these facilities are mentioned in the current DEIS, the potential detriment to the workers and public is not clearly discussed and the implications are minimized.

IND338-15

The implication that a "Safety and Security Plan" including training on-site personnel in first aid and CPR is sufficient to ameliorate the hazards to the workers and the public in both construction and operation phases because the applicant declares the "pipeline would be safely installed...and would not be a threat to public safety" fails to responsibly address the potential need for medical care in the event of an accident. Further, the safety and ability to treat either workers or the public due to injuries related to the proposed JCP need to be more fully addressed.

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I request that the DEIS be revised to add a careful analysis of the impact of the project on an already strained medical delivery system in Coos County including the lack of Level I and II trauma care facilities in the counties crossed by the PCP. Additionally, a clear, detailed plan of how emergency care services would be provided in the event of a major incident potentially involving the over 16,000 people residing within Zones of Concern 1, 2, and 3 needs to be included.

IND338-16

4.9.2.3 Property Values

Comment: In the DEIS the LNG facility is described as one of a group of noxious facility types and the DEIS is therefore required to address impact of placement on property values. To come to the conclusion that property values in the region would not be affected, the DEIS cites several sales comparison studies. To make an appropriate comparison as required by NEPA, a study based on sales using profiles of consumers currently purchasing property in areas that could be impacted (including along the proposed pipeline route in which 68% of the properties impacted are privately owned) needs to be undertaken.

IND338-17

In addition, according to a document prepared for the DOE regarding accurate analysis of noxious facilities on property values, psychometric studies indicate that the US population is averse to living near noxious facilities. Contingent valuation and hedonic studies find that the net economic impacts of proximity to noxious facilities are generally negative and often substantial. This information is in direct contradiction to that supplied in the current DEIS. The key to predicting perception-based impacts lies in combining psychometric and hedonic methods. The reliability of psychometric measures as indicators of aversive stimuli that precipitate economic impacts can be empirically tested. To test the robustness of the findings, alternative estimation methods can be employed in the hedonic analysis. Contingent valuation methods can confirm the results.

IND338-18

In order to be adequate, I ask that the DEIS be amended to include a study using a predictive model of perception-based impacts and identify the data and methods needed to implement it as part of the scoping process. Without a reliable and current study of the public perceptions of the proposed JCP and PCP as described, the current DEIS is insufficient and does not accurately predict the impact of the proposed facility and pipeline on property values.

The North Bend area, especially that nearest to the proposed JCP and the area across the bay is particularly desirable as residential property because of its proximity to the bay and the views. Land proposed to be crossed by the pipeline includes ranch and farmlands desirable due to usability. All of these functions are negatively impacted by proximity to a noxious facility and/or pipeline. I ask that the DEIS address this issue using state-of-the-art surveys and study methods directly involving the people in the area as this is the only way for the analysis to be accurate. "Overall, the welfare losses to changing the status quo in these matters are incurred by the original residents, not by the in-migrants." An exact description of these potential losses needs to be clearly outlined for the DEIS to be complete. With that said, there is also information lacking on the analysis of out-migration as a result of the proposed facility and its impact on the community. This needs to be included for the DEIS to be adequate.

IND338-19

According to a study on the effect of power plants on local housing values and rents by Lucas W. Davis (May 2010), "across specifications the results indicate 3-7 percent decreases in housing values and rents within two miles of plants with the semiparametric estimates suggesting somewhat larger decreases within one mile. In addition, there is evidence of taste-based sorting with neighborhoods near plants experiencing statistically significant decreases in mean household income, educational attainment, and the proportion of homes that is owner occupied."

IND338 Continued, page 7 of 11

IND338-16 See response to comment IND338-15.

IND338-17 We used the most relevant studies currently available.

IND338-18 It appears the commenter is referring to a 1991 paper by L.A. Nieves and D.E. Clark, "Determining Perception-Based Impacts of Noxious Facilities on Wage Rates and Property Values." This paper actually notes that LNG storage facilities are an exception to the finding that impacts of proximity to noxious facilities on property values are negative, citing studies that found either positive benefits on property values or that people were least averse to gas plants/LNG storage. This supports the EIS conclusion that the siting of an LNG terminal would not have significant adverse effects on nearby property values.

IND338-19 Potential impacts to property values are evaluated in section 4.9 of the EIS. See also response to comment IND338-18.

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Because the project includes a power plant, specific information about the impact of such a facility on property values and other environmental impacts need to be addressed, particularly as relates to the potential for negatively changing the socioeconomic demographics of an area. Stating that impacts are “relatively” small because plants tended to be opened in locations where the population density is low is misleading because part of the attraction of the area impacted which contributes to higher property values is the lower population density.

IND338-20

Without addressing this, the DEIS as it stands is misleading and incomplete regarding impact on property values and the rental housing market. Reducing the socioeconomic status of an area near a noxious facility also impacts environmental justice whereby people of lower income may be forced by the changing market to locate in these areas. This needs to be addressed as well for the DEIS to be complete.

IND338-21

4.9.1.9 Environmental Justice

Comment: Regarding National Response to Emergency, there are three main definitions out there from federal and other agencies, the definition used in the National Response Framework (NRF) is as follows: Populations whose members may have additional needs before, during, and after an incident in functional areas, including but not limited to: maintaining independence, communication, transportation, supervision, and medical care. Individuals in need of additional response assistance may include those who have disabilities; who live in institutionalized settings; who are elderly; who are children; who are from diverse cultures; who have limited English proficiency or are non-English speaking; or who are transportation disadvantaged.

The Comprehensive Preparedness Guide (CPG) 301, Emergency Management Planning Guide for Special Needs Populations Federal Emergency Management Agency and DHS Office for Civil Rights and Civil Liberties: This definition is the same as the NRF.

A second definition is put forth by the US Department of Health and Human Services, At Risk, Behavioral Health, and Human Services Coordination (ABC) are using the following definition:

Before, during, and after an incident, members of at-risk populations may have additional needs in one or more of the following functional areas: communication, medical care, maintaining independence, supervision, and transportation. In addition to those individuals specifically recognized as at-risk in the Pandemic and All-Hazards Preparedness Act (i.e., children, senior citizens, and pregnant women), individuals who may need additional response assistance include those who have disabilities, live in institutionalized settings, are from diverse cultures, have limited English proficiency or are non-English speaking, are transportation disadvantaged, have chronic medical disorders, and have pharmacological dependency.

The third definition by the Association of State and Territorial Health Officials (ASTHO) is similar to the one adopted by ABC, but adds in additional factors to consider such as economic disadvantage and a lack of a support system.

In order to be complete and in the interest of environmental justice, I ask that the DEIS include an emergency response plan that specifically addresses the functional areas and additional needs of at-risk populations defined by the U.S. Department of Health and Human Services before, during, and after an incident. The groupings and percentages of these at-risk populations in the areas impacted by the proposed JCP and PCP also need to be expanded in the DEIS to include all categories identified as having special needs as described above.

IND338-22

IND338-23

IND338 Continued, page 8 of 11

IND338-20 The ODE-EFSC would make the decision on whether or not to authorize the construction and operation of the power plant.

IND338-21 Environmental justice is addressed in section 4.9 of the EIS.

IND338-22 An emergency response plan is discussed in section 4.13 of the EIS.

IND338-23 We discuss at-risk populations, including children, elderly, disabled, and non-English speakers in the Environmental Justice portion of section 4.9 of the EIS.

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These at-risk populations described above are further compromised and potentially affected in terms of access to regular health care services by an influx of temporary workers and their families in an area already identified as medically underserved by the federal government. In order to be sufficient, I ask that the DEIS include a mitigation plan to address this impact.

IND338-24

The applicant reports not being able to “clearly identify” at risk populations in the buffer zone of the proposed JCP. This is unacceptable and needs to be addressed in an amended DEIS. At the least the applicant can apply the known percentages of the at risk populations identified in the U.S. census and create a plan accordingly. (For example, the percentage of seniors is defined as over 21% for the region and is greater than the state average, therefore a plan could be developed based on this percentage of the population in the buffer zone with percentages applied for creating appropriate emergency management plans for other at risk populations accordingly) This needs to occur for the DEIS to be complete.

IND338-25

Accidents

Comment: I request that the DEIS be amended to include the recent industry accidents involving the Yellowstone River in Montana including details related to damage to the watershed and all aspects of deleterious environmental impact to the area. Also, the same should be included related to the recent running aground of the LNG vessel outside of Nigeria. Because the applicant has emphasized the minimal impact of accidents on the public and the environment, it seems vital for these recent incidents involving the industry to be included because of the noxious and hazardous nature of these projects including short-term and cumulative effects.

IND338-26

Children’s Health and Safety

Comment: According to a memorandum from the U.S. Environmental Protection Agency, sent by Susan Broom, Director, Office of Federal Activities and Peter Grevatt, Director, Office of Children’s Health Promotion: “Executive Order 13045, “Protection of Children from Environmental Health Risks and Safety Risks” (April, 1997) directs Federal agencies, to the extent permitted by law and appropriate, to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children and to ensure that policies, programs, activities, and standards address disproportionate risks to children that result from environmental health or safety risks.

It is well documented that children are more susceptible to many environmental factors that are commonly encountered in EIS reviews, including exposure to mobile source air pollution, particulate matter from construction or diesel emission and lead and other heavy metals present in construction and demolition debris. We recommend that an analysis of potential impacts to children be included in a draft EIS if disproportionate impacts on children cause by the proposed action are reasonably foreseeable. Childhood exposures at each life stage, including those experienced via pregnant and nursing women, are relevant and should be considered when addressing health and safety risks for children.

IND338-27

We recommend that the draft EIS assess children’s potential exposures and susceptibilities to the pollutants of concern, including the following:
Identification of the pollutants and sources of concern, Exposure assessment, Baseline health conditions, Impacts from Air Pollutant Emissions, Respiratory Impacts/Asthma, Noise impacts,

IND338 Continued, page 9 of 11

IND338-24 Temporary construction workers would not impact at-risk populations, as they would be housed in a company operated North Point Housing Complex. Jordan Cove would provide some medical facilities for its workers. See response to IND338-13.

IND338-25 The FEIS text has been revised. See also response to IND338-23.

IND338-26 The incident in Montana involved an oil pipeline. The FERC does not regulate the siting or construction of oil pipelines. The DOT regulates the design and safety standards for oil pipelines. See discussion of natural gas pipeline reliability and safety in section 4.13 of the EIS.

IND338-27 As indicated in section 4.9 of the EIS, the project area contains fewer children than the state-wide average. Air pollution is discussed in section 4.12 of the EIS.

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Impacts Regarding Obesity Factors, especially impacts on accessibility of parks, green spaces, and recreation areas, potential impacts to the food and water supplies of traditional life-ways of tribal children, Air Quality Impacts from Non-Mobile Source Emissions, especially adverse impacts due to increased emissions from power plants, Impacts from Mobile Source Air Pollutant Emissions including exposure from project construction and operations including significant increases in traffic which impact safety, projects which introduce significant new vehicle and truck traffic on roads near residential neighborhoods and areas where children are likely to be present, Impacts from Other Chemical or Physical Exposures such as pesticide application, demolition etc., Projects that could bring children into contact with soils that could be contaminated."

IND338-27
Cont'd

The current DEIS fails to address the special risks to children's health and safety in the aforementioned areas and I ask that it be amended to do so in order to be considered adequate. The zones of concern identified in the DEIS include 6 schools and well-over 3,000 children. These numbers do not include Southwestern Oregon Community College which is located in Zone of Concern 3 and has a Family Center on site which provides day care to 30 toddlers. Both the proposed Jordan Cove Project and the PCP create environmental hazards to children that have not been sufficiently evaluated, for example, the application of pesticides in areas susceptible to pesticide drift to maintain the 50 foot wide permanent easement required by the pipeline project. Nor nor does it evaluate the health risks during the building phase and the need for a 95 ft. wide construction zone for the pipeline. The construction zones and the noise from the proposed JCP will be within proximity of schools and day care centers (as well as residential areas) and the impact of this on children has not been addressed.

In addition, the JCP project impacts (according to the BLM's Final North Spit Plan) one of the largest and most accessible tracts of public green space available for the Coos Bay Area Communities (BLM 205). The compromise of this green space and its impact on children and the community is not adequately addressed in the DEIS.

There has been public testimony by physicians regarding the negative impact to children due to the changes in the air quality because of the proposed project, yet, the applicant has not seen fit to evaluate these hazards to vulnerable populations (children, in this case). For example, studies on the impact of residential proximity to potential environmental hazards on cardiovascular, respiratory and chronic illness are not sufficiently represented. Without this analysis and information, the DEIS is incomplete and I ask that this information be included. The direct, indirect as well as the cumulative impacts must be evaluated for the DEIS to be considered complete.

Of additional concern, is the impact on the health of the disproportionate number of seniors currently living in the area which is also not addressed adequately in the DEIS.

IND338-28

There is conflicting testimony on the impact of the closure of the airport during the time an LNG tanker would be en route to the terminal, particularly to critically ill or traumatized patients (including vulnerable populations and children) needing to be airlifted for appropriate treatment. This impact needs to be assessed and addressed in an amended DEIS.

IND338-29

Closing Comment:

This DEIS, in general, seems to be attempting to justify the applicant's project rather than provide a rational examination of reasonable alternatives presented in comparative form. All too often in this document the phrase "minimal impact" or other similar subjective language is employed which could be construed as attempting to slant the choices in favor of the applicant. In my opinion, this has led to the creation of a DEIS that sadly fails to rigorously explore and objectively present the issues and alternatives to allow for an honest and clear appraisal of the proposed project. I ask that

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IND338-28 As discussed in section 4.9.2.9, while the counties crossed by the Pacific Connector pipeline have a slightly higher percentage of elderly than the state average, the Project would not have disproportionate impacts on their health or welfare.

IND338-29 The Project would not result in the closure of the Southwest Oregon Regional Airport; see section 4.10.1.4 of the EIS.

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IND338 **Continued, page 11 of 11**

the DEIS be revised to address the concerns outlined in my comments so that we may have an unbiased and thorough Environmental Impact Statement to review.

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IND339

Torrey K Byles, Talent, OR.
To whomever it may concern:

There are three general reasons why the Pacific Connector Pipeline and the Jordan Cove LNG plant should not be built.

Environmental. Regionally and globally, this infrastructure despoils the environment. Regionally, hundreds of rivers will be compromised with leaking gas, including big rivers such as the Klamath, the Rogue and the Umpqua. Globally, this project contributes to climate change by aiding and abetting the ruin of our atmosphere with combusted LNG.

IND339-1

IND339-2

Social equity. The tens of millions of dollars that local economies will receive in wages and property taxes pales in comparison to the hundreds of millions to billions in profits that this pipeline and terminal will bring to a handful of corporations, one of whom is not even an American company. Contrary to what the promoters of this project claim, this project hurts the US balance of payments. From the easy royalty payments to the limited income to local communities, this project steals wealth from the national and regional publics and puts it into the hands of a few private non citizens.

IND339-3

Democratic process. Giving eminent domain to private companies, and the several agencies (BLM, USFS, Oregon DEQ) who are modifying their environmental standards to accommodate these private interests, makes a sham of the principles of democratic public process.

IND339-4

This project is bad on all of these very major accounts. Please deny it.

Sincerely,

Torrey Byles

IND339 Torrey K. Byles, Talent, OR

- IND339-1 As explained in the EIS, the construction of infrastructure related to this Project would not despoil the environment. Impacts on waterbodies are discussed in section 4.4. In the highly unlikely case of the pipeline leaking, natural gas is lighter than air and would rise and not contaminate rivers.
- IND339-2 See the response to IND1-1. Actually, if LNG is shipped to Asia, and displaces the burning of coal at power plants, there would be less air emissions globally.
- IND339-3 See section 4.9 for an explanation of the economic benefits of the Project.
- IND339-4 Congress passed the NGA and Section 7(h) of the NGA conveys the power of eminent domain to private companies that receive Certificates from the FERC.

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IND340

John Schofield, Renton, WA.
FERC Comments to
Draft EIS
February 13, 2015

My name is John Schofield, my wife Lynn and I are affected landowners located at 1868 Hoover Hill Rd. Winston. Mile Post 60.11 to Mile Post 60.26

The current path of the pipeline, transverses behind our main house, within 500 feet of our main house and 300 feet of our family entertainment area in our garage. This distance to the house if a pipeline rupture was to happen is unsafe. Based on the the last 10 years of records, when 36 inch natural gas pipes burst it cause major damage to over 300 yards away. Our house is only 166 yards away and our garage is only 100 yards away. Our house would be consumed in a fireball if this event was to occur with little to know warning.

IND340-1

The current path of the pipeline and the construction zone would interfere with our natural spring and the associated holding tanks that we rely on for drinking water. It is our concern that either through the construction process and/or the life of this pipeline there will be a strong chance of interference with the spring's production or worse contamination of the spring. It is our strong belief that the once the pipeline is buried our natural spring water will follow the path of least resistance which will be the path of the pipeline and will forever alter our ability to have fresh water to our residence. This opinion is based on local water experts review of our property.

IND340-2

Perhaps worst of all the current path of the pipeline will go through our family cemetery and will upset and alter forever the most beautiful places on the ranch and the final resting places of both of our fathers and grandmother and the planned resting place of our mothers, myself, my wife and our family. Oregon Law prohibits the use of Eminent Domain through cemeteries Public or Private.

IND340-3

We are requesting that FERC, if the pipeline is to be an approved project, alter the coarse of the pipeline in relation to our property. Instead of going through the upper middle of the property, we request the pipeline be rerouted to go on the southern most edge of our property line. With this new route there would not be any new streams to cross, or other new environmental obstacles. I believe that if Williams really wants to work with landowners, this adjustment is not too much of a concession to ask. They would miss interfering with our spring that supplies our drinking water. They would make our home safer in the event of a pipe failure and they would not disturb our family cemetery.

IND340-4

I also want to express that the use of Eminent Domain by a public entity with the intent to transfer ownership to a private party is illegal in Oregon and goes against Ballot Measure 39 which was passed by 79% of the Douglas County Oregon voters and 67% of the Oregon State Voters in 2006. Approving the use of Eminent Domain would be in violation of this State Measure and State Resolution.

IND340-5

Thank you for your considerations to this adjustment.

John Schofield

IND340 John Schofield, Renton, WA

- IND340-1 Safety is addressed in section 4.13 of the EIS. The DOT regulates pipeline design and standards. It is highly unlikely that the pipeline would rupture and damage your house.
- IND340-2 Construction of the pipeline may not necessarily impact your spring. However, in its Groundwater Supply Monitoring and Mitigation Plan, Pacific Connector states that should it be determined after construction that there has been an effect to groundwater supply (either yield or quality), Pacific Connector would provide a temporary supply of water, and if determined necessary, would replace the affected supply with a permanent water supply. Mitigation measures would be coordinated with the individual landowner to meet the landowner's specific needs. In addition, during easement negotiations the landowner can work with Pacific Connector on siting the line within individual properties to increase the distance between the pipeline and any springs or wells, and for compensation for damages.
- IND340-3 During easement negotiations with private landowners Pacific Connector would identify areas of concern and adjust the pipeline location within that property accordingly. We agree that your family cemetery should be avoided.
- IND340-4 See response to IND340-2 above.
- IND340-5 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. We hope that you will reach a mutual agreement with Pacific Connector for an easement across your property, so that eminent domain is not used.

NEPA requires a Supplemental EIS when there are “new circumstances.”

Conventional natural gas decline and the peaking of shale gas fracking are new circumstances for the “export” terminal, pipeline and power station. 5

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Peaked Energy and Climate Chaos: two aspects of overshoot

Jordan Cove LNG EIS 3 Mark Robinowitz - PeakChoice.org

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Peak Money: A Permanent Change
Peak Electricity was in 2007
Peak Traffic was in 2007
Peak Airplanes (domestic) was in 2007
A Dam Big Problem: the Willamette Valley tsunami

A lot of the background documentation attached to these comments shows how some of the fuel that will allegedly be exported from the United States of America through Coos Bay, Oregon does not actually exist.

Therefore, this "export" terminal is going to flip back to an import terminal as conventional natural gas declines further and the fracking boom peaks and declines due to geological limits.

I hope that there are other comments submitted for the record that discuss these physical facts, it would be good for other Oregonians to notice depletion and exaggerated estimates from energy companies.

A disclaimer about the attached articles that I did not write: I am merely including them as expert background information on this issue to provide further documentation on the assertions in my comments. These articles are not being submitted on behalf of their authors, merely for the purpose of making their writing easier to find and to be included into the formal record. If you like their writing, subscribe to their email lists, buy their books, donate to their efforts, increase awareness of their good work.

It's a cold political reality that today no candidate can win election on a platform that respects the laws of physics on a finite planet.

-- Dave Gardner, "Who Will Get This Economy Moving? No One," Nov 05, 2012
www.growthbusters.org/2012/11/who-will-get-this-economy-moving-no-one/

We are constantly being told about "a permissible amount of radiation."

Who permitted it? Who has any right to permit it?

-- Dr. Albert Schweitzer, On Nuclear War And Peace, p. 176,
www.schweitzerfellowship.org/features/about/phil/phil.aspx?id=20

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NEPA REQUIRES A SUPPLEMENTAL EIS WHEN THERE ARE "NEW CIRCUMSTANCES." CONVENTIONAL NATURAL GAS DECLINE AND THE PEAKING OF SHALE GAS FRACKING ARE NEW CIRCUMSTANCES FOR THE "EXPORT" TERMINAL, PIPELINE AND POWER STATION.

National Environmental Policy Act (not Protection Act)

The National Environmental Policy Act (NEPA) is the law that requires Environmental Impact Statements (for large projects) and Environmental Assessments (for smaller projects). The start of an EIS or EA is the drafting of a "Purpose and Need" to identify a problem, followed by "scoping" of a range of reasonable alternatives. The preferred alternative is approved in a "Record of Decision" after the Final EIS, at which time citizens can sue to block the project.

NEPA was signed by President Nixon and governs all federal actions that impact the environment, including this LNG terminal permit, pipeline route, wetland destruction permits and other federal aspects of this project. NEPA is sometimes misstated as the National Environmental Protection Act, but it is procedural law, not substantive -- it merely requires adequate disclosure of all decisions. NEPA does not require selecting the least destructive alternative, merely full disclosure of impacts. If an administration planned to destroy all life on Earth, NEPA would require that they analyze a range of alternatives (perhaps an option to destroy half of the Earth along with a "No Action" option). This may sound like hyperbole, but there have been many EISs prepared for nuclear weapons bases, the most omnicidal technology ever invented.

The National Environmental Policy Act (NEPA) mandates a "Supplemental" Environmental Impact Statement must be prepared if there are "new circumstances" relevant to the project. The decline of conventional natural gas and the peaking of shale gas fracking regions since the original proposal was first analyzed means that the flipping back of this project to an "import" terminal must be considered in a Supplemental EIS. The bulk of these comments contain technical details that explain why "export" is unlikely due to physical constraints and therefore full disclosure of what is really planned must be explored before a Record of Decision can be issued (preferably in support of the No Build option).

This EIS also ignores the ultrahazardous aspects of an LNG terminal next to a city and an airport runway and worse, ignores the unique dangers that the Cascadia Subduction Zone poses to operation of this terminal. A 9.0 earthquake, land

IND341-1

IND341-2

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IND341-1 We are not aware of significant new circumstances which would warrant a supplemental DEIS. We do not intend to produce a supplemental EIS. LNG vessels are not atomic bombs. The State of California has never denied an LNG terminal, because only the FERC can authorize such a facility onshore. LNG terminals in Mexico are discussed in section 3.2.2.2. Cumulative impacts are discussed in section 4.14. Potential soil contamination at the Jordan Cove terminal is discussed in section 4.3.1. Impacts on property values are discussed in section 4.9. Clearing of vegetation is discussed in section 4.5.

IND341-2 The Jordan Cove terminal is not "superhazardous." Safety is discussed in section 4.13. Impacts on the Southwest Oregon Regional Airport; see section 4.10.1.4 of the EIS. Geological hazards such as earthquakes and tsunamis are discussed in section 4.2 of the EIS. LNG vessel traffic is discussed in section 4.10.1.1. Only the FERC can authorize an onshore LNG terminal, and no application was ever submitted for a terminal in Humboldt Bay, California.

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subsidence and a massive tsunami might cause an enormous fireball that could destroy Coos Bay and North Bend towns, risks that are barely hinted at in the EIS. The extreme dangers of LNG tankers are why Homeland Security's Coast Guard requires large exclusion zones around these ships, an economic impact to boat traffic for Coos Bay that is not discussed in the EIS (and a reason why the proposed terminal for Humboldt Bay was withdrawn).

The Jordan Cove application is one of the larger EISs on record (5,048 pages), and violates the NEPA requirement that EISs not be excessively long. I trust that my more modest comments and attached technical information will not be overly burdensome for FERC bureaucrats and contractors to read and will be helpful for impacted land owners, other concerned citizens, environmental groups and others in the quest to understand the full scale of this project and why its cancellation is imperative. The enclosed information also describes energy reality as we pass the limits to growth on a finite planet.

The major difference between Jordan Cove's original proposal in Docket No. CP07-444-000 and its current proposal in Docket No. CP13-483-000 is the change from an LNG import terminal to an export terminal based on changes since 2007 in the availability of domestic natural gas. The switch to LNG export rather than import resulted in some design changes at the terminal. For example, the vaporizers which were critical elements for an LNG import terminal would be unnecessary at an export terminal, and instead would be replaced by liquefaction trains, and the addition of refrigerant resupply and storage, and aerial cooling system. The natural gas liquids extraction facility for the LNG import proposal in Docket No. CP07-444-000 would not be necessary for the export proposal, and would be replaced by a pipeline natural gas processing plant.

p. 1-6

Council on Environmental Quality regulations

40 CFR 1502.7 Page limits.

The text of final environmental impact statements (e.g., paragraphs (d) through (g) of § 1502.10) shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages.

40 CFR 1502.9:

Draft, final and supplemental statements.

(c) Agencies:

(1) Shall prepare supplements to either draft or final environmental impact statements if:

- (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or
- (ii) **There are significant new circumstances or information** relevant to environmental concerns and bearing on the proposed action or its impacts.

Jordan Cove LNG EIS

6

Mark Robinowitz - PeakChoice.org

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IND341-3 The EIS complies with the NEPA; see the response to IND3-3. The length of the document is related to the complexity of the Project, covering the Jordan Cove LNG terminal, the 232-mile-long Pacific Connector natural gas pipeline, and amendments to BLM and Forest Service land management plans.

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A faulty idea: building an ultrahazardous LNG terminal in a severe seismic zone with catastrophic tsunamis

The risk of the Cascadia Subduction Zone earthquakes and tsunami for the Jordan Cove LNG terminal should have been sufficient to cancel the project. Every other consideration and complaint is secondary in comparison.

Jordan Cove may be the most seismic location ever chosen for an LNG terminal. The nearby Cascadia Subduction Zone has generated Richter 9 earthquakes and very large tsunamis. This was not understood until the 1980s, but it is well understood now, even though the timing and precise severity of the next earthquake is impossible to predict.

The Draft EIS does not include maps of the potential liquification of soils during a CSZ earthquake and how this would impact the terminal, power station, compressor and pipeline. The Draft EIS does not include maps of the potential tsunami inundation zones even though these are public information, nor does it consider the impact of tsunami on the channel, especially if an LNG tanker were in the channel when a CSZ tsunami was generated.

The Draft EIS does not discuss the potential for sudden subsidence caused by a CSZ earthquake, which is especially egregious considering that one factor that caused the January 1700 earthquake to be discovered was a cedar forest that was dropped about 20 feet (6 meters) and submerged into salt water. Investigation of this dead cedar forest revealed that substantial parts of the Oregon coast dropped as a consequence of the quake and this needs to be considered for the Jordan Cove alleged safety analysis.

Assumptions about the size of the CSZ tsunami would be wrong if subsidence accompanied the shaking and tsunami generation. It's impossible to say that this could not happen in the Coos Bay area whenever the next CSZ earthquake happens.

The 2004 Indian Ocean tsunami and the 2011 Sendai, Japan tsunami were each more powerful than predictions of seismic risk had estimated, with devastating consequences for coastal communities. Downplaying the risk for Coos Bay and North Bend is convenient for promoters of LNG (and real estate developers in the tsunami inundation zones) but the people of these cities are held hostage to these projects.

The Fukushima Daiichi nuclear power complex was designed with an estimated wave potential of about thirty feet. The actual tsunami that inundated the facility was closer to forty five feet, shorting out the emergency core cooling system and battery backup, leading to the multiple nuclear meltdowns that continue to leak nuclear waste into the Pacific Ocean.

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IND341-4 Liquefaction of soils and subsidence at the Jordan Cove terminal caused by an earthquake is discussed in section 4.2.1.3, along with other seismic hazards. See response to IND6-2. The tsunami generated by the 2011 Tokohu earthquake damaged only one LNG terminal in Japan (the Minato Plant). That plant, located in Sendai, was low-lying and not well protected from inundation. The Jordan Cove LNG terminal will be both elevated and well protected by berms.

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An LNG ship and terminal has the energy potential of a small nuclear bomb

LNG is very different from liquified petroleum, usually called propane. Propane is easy to condense and is a liquid at room temperature. Natural gas, on the other hand, has to be cooled to the temperature of the planet Saturn to reach a liquid state. This is the only way that it can be transported profitably in containers. Most natural gas around the world is moved via pipelines where the expense, energy and extra danger of LNG is not required.

LNG terminals have a worst case accident potential of an explosion comparable to the smallest of nuclear weapons. That alone should prohibit any LNG facilities next to Coos Bay, North Bend and especially their airport. Would Jordan Cove be the closest LNG terminal on Earth next to an active airport? What would the risks be of an accidental or intentional crash of a plane into the LNG ship or storage tanks? This location can have severe winter windstorms which make aviation difficult.

Even the LNG import terminal in Chesapeake Bay, Maryland, which is near Calvert Cliffs nuclear power station, is several miles away from that facility.

There are no residences within 1 mile of the proposed terminal. The Jordan Cove property is currently open land zoned for industrial development, and is large enough to accommodate all proposed facilities and the surrounding vapor hazard zone.
Draft EIS, p. 3-11

The Supplemental EIS needs to include, among other concerns, potential LNG leaks from a Cascadia Subduction Zone earthquake and / or tsunami breaking the pipes of the gas facilities. It also needs to examine the risk to nearby citizens from tankers using the channel, not just the danger from the terminal location.

<http://citizensagainstlng.com/wp/2014/12/23/opponents-of-jordan-cove-lng-export-pack-ferc-meetings-in-southern-oregon-dec-8th-13th-2014/> has a copy of a hazard map from a previous iteration of the EIS, it needs to be included in a Supplemental EIS to fully explore the hazards that Coos Bay / North Bend area citizens would face from LNG tanker traffic. A copy is attached below.

IND341-5

IND341-6

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IND341-5 The LNG terminal would not explode like a nuclear weapon. See the safety section 4.13. Our analysis of potential Project-related impacts on the Southwest Oregon Regional Airport in North Bend can be found in section 4.10.1.4 of the EIS.

IND341-6 Impacts from an earthquake and potential tsunami are discussed in section 4.3. As stated in section 1.1.1 of this EIS, we are incorporating the findings of the May 2009 FEIS for the import proposal into our current analysis where circumstances have not greatly changed. Because LNG vessel traffic in the Coos Bay navigation channel is similar in the export case, our original analysis of the Zones of Concern for the import proposal remains virtually unchanged. The analysis is summarized in section 4.13.6.3 of this EIS. Second, because an accident involving an LNG vessel in the channel is highly unlikely, as explained in section 4.13, the regulations for implementing the NEPA do not require us to consider events that are unreasonable or not foreseeable.

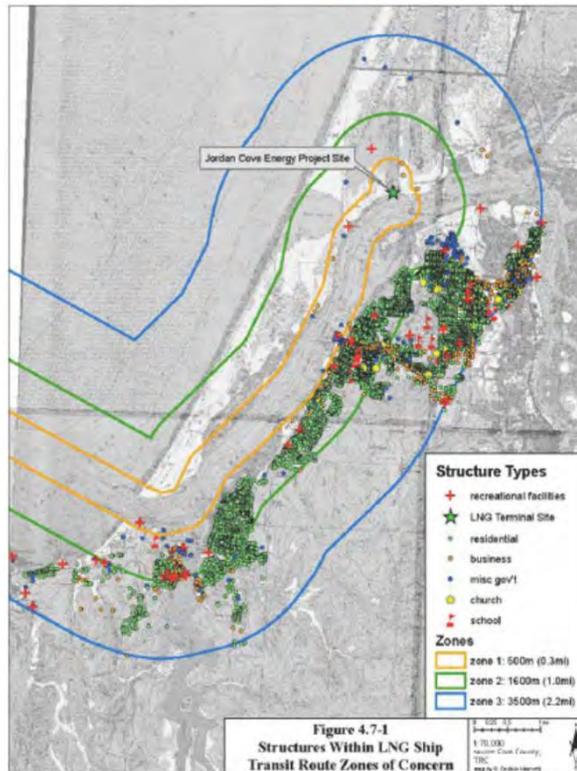
Jordan Cove LNG Tanker Hazard Zones (FEIS Page 4.7-3)

Zone 1 (yellow) - No one is expected to survive in this zone. Structures will self ignite just from the heat.

Zone 2 (green) - People will be at risk of receiving 2nd degree burns in 90 seconds on exposed skin in this zone.

Zone 3 (blue) - People are still at risk of burns if they don't seek shelter but exposure time is longer than in Zone 2.

Map does not include the hazard zones for the South Dunes Power Plant and the Pacific Connector Gas Pipeline.



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IND341-7 See response to IND341-6.

in Appendix B would take anywhere from 10 – 20 minutes to release up to 50% of the LNG in an individual tank for a large spill and up to one hour for a small spill, depending on the location.

The thermal radiation that will damage structures is approximately 37 kW/m² for durations of more than 10 minutes. Damage can be expected to the vessel and nearby steel structures, because steel strengths are reduced to 60 – 75% of their room temperature values at 800° K. Further reduction in strength will result for temperatures above 800° K. Steel will melt at approximately 1800° K and is generally considered to have no strength at half the melt temperature, or 900° K. The calculations suggest that these temperatures could exist at a spill from an LNG cargo tank from 30 minutes to an hour and, therefore, potentially damage nearby steel and other structures.

Of even greater importance is the possibility that a large spill could cause a cascading set of LNG cargo tank failures. In this instance, significant long-term fire damage could result to a nearby steel structure, unloading terminal, or unloading platform. Positive operational and risk management measures can be taken to try to prevent these types of issues. This could include redundant or multiple offloading capabilities or moorings, fire protection systems, etc., as identified in Section 5.

note: a substantial section of the communities along the Coos Bay channel to the ocean would be in the zone considered at risk for heat damage from an accident as profiled in this Sandia report. This needs to be discussed in a Supplemental Draft Environmental Impact Statement.

IND341-7

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LNG terminals stopped in California USA, import terminals built in Baja Mexico

For more than a decade, LNG companies have targeted numerous communities up and down the West Coast, trying to find the zone of least resistance to build a new terminal.

Now that LNG terminals have been canceled in Vallejo and Eureka, California, and the proposals for the mouth of the Columbia are passed (mostly), Jordan Cove seems to be "last terminal standing."

Two sites were proposed for California. The first was in the San Francisco suburb of Vallejo, in the north bay, was the site of a proposed LNG terminal. This idea didn't last long.

I am not familiar with the precise excuses used to cancel this concept, but I cannot imagine the Coast Guard / Homeland Security was pleased by the idea of LNG tankers passing under the Golden Gate and Richmond bridge, with the obvious danger to these structures from accidents or terrorism (or the risks posed to the San Francisco financial district). Coos Bay has a tiny percentage of the population of the San Francisco bay, much less wealth and apparently no political power to deflect this sort of abuse.

A second California site was in Humboldt Bay, near Eureka. The local fishermen complained that their access in and out of the harbor would be severely curtailed due to the exclusion zones placed around LNG tankers. This idea went up in smoke, too.

California was targeted for LNG import terminals to help provide fuel for their electricity generators, since nearly every new installation for electricity production in recent decades has been based on natural gas. The failure to find a site in California for LNG didn't end the desire to use natural gas for electricity, it just changed which communities were supposed to host the potential hazards of LNG and the associated pipeline.

Of all the sites proposed for Oregon, Jordan Cove is closest to construction, presumably because the pipeline would be much more rural than the proposed routes from the lower Columbia through the Portland suburbs. Rural communities are often treated as sacrifice zones by big polluters, whether corporate or governmental, a blatant example of environmental injustice.

During the debates about Jordan Cove and other potential Oregon LNG terminals, new LNG import terminals opened on the west coast of Mexico, as mentioned in the Draft EIS:

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IND341-8 Only the FERC can authorize an onshore LNG terminal, and no applications to the FERC were ever submitted for terminals in Vallejo or Eureka, California. Environmental justice is addressed in section 4.9 of the EIS.

There are two existing LNG import terminals on the West Coast of Mexico. One is known as Costa Azul LNG, located about 14 miles north of Ensenada, Baja Mexico. Owned by Sempra Energy, this import terminal started operations in May 2008. It has the capacity to send out about 1 Bcf/d of natural gas, intended to supply customers in northwest Mexico. The other LNG import terminal on the West Coast of Mexico is farther south, at the port of Manzanillo. This terminal, jointly owned by Samsung C&T, Mitsui Trading, and Korea Gas, went into operation in 2012, and has the capacity to take in 3 million tons of LNG per year. We are unaware of any plans to convert the LNG import terminals on the West Coast of Mexico to export facilities. Such a conversion would require the installation of liquefaction trains. Extensive pipeline construction would be required to transport Rocky Mountain and Canadian gas to Mexico if they were converted to export LNG. Therefore, the Mexican terminals do not meet the Project objectives.
- Draft EIS, p. 3-7

The Baja terminal is specifically aimed to help with the California, USA gas network (not only the energy use in Tijuana). Southern California does not need much heating fuel -- this gas import is in large part for electricity generation.

There is also a plan for an LNG import terminal in the Coronado Islands off the coast of Baja California. Several articles on line suggest that this proposal has been canceled, but the most current photos in Google Earth show a pair of terminal docks immediately next to the islands with tankers docked to them. This location is around 32 degrees 23.984'N, 117 degrees 14.146' W

Mexico has stronger community protection standards than Oregon for LNG siting?

The Costa Azul and Manzanillo LNG import terminals referenced in the Draft EIS have substantially larger set back from nearby communities than the Jordan Cove proposal.

The Baja (Costa Azul) terminal is almost 4 kilometers from a golf resort. There are no closer residences to the terminal, although the region's main highway passes closer than this.

The Manzanillo terminal is closer to a city, but the nearest neighborhood is still about 4 kilometers away. There are a couple isolated farmhouses closer to the northeast, but they're not immediately adjacent.

Four kilometers may not be sufficient buffer for a worst case LNG spill and explosion, but it's far more than the North Bend / Coos Bay metro area may get.

In contrast, most of North Bend is within 4 km of Jordan Cove. Some areas are very close to the terminal that the tankers would have to traverse, including the airport, schools and lots of residences. Several communities are along the channel between

the terminal and the ocean and are in the high danger zone if there is an accident of any kind.

Mexico's reputation is that it has laxer environmental and public health safety regulations than Los Estados Unidos. That is presumably why California's new LNG import terminal was built south of the border, where Environmental Impact Statements are not required. But it seems that Oregon is treating the cities of North Bend, Coos Bay and surrounding areas with less consideration than the Mexican government, which at least ensured considerable buffer between these new terminals and its population.



Manzanillo, Mexico LNG terminal - the line represents 4 kilometers. There is a small neighborhood on the left of the photo, next to an industrial area (far left of photo). The main city of Manzanillo is on the mainland. A few isolated farms are about two kilometers from the terminal on the right side of the photo.



Baja LNG terminal. No cities are nearby. The line drawn on the map represents 4 kilometers. The golf course on the upper left of the photo has its residences (rooms to rent) about 4 kilometers away.

On Mexico's Caribbean coast, the LNG terminal at Altamira, near the city of Tampico, also has set back from residential areas. It is in the middle of a large industrial area and harbor. A nearby small town, Lomas del Real, is about 2.5 to 3.5 kilometers away. Additional residential regions are 4.5 kilometers away, to the south, and the main city of Altamira is 8 to 14 kilometers away.

The US LNG terminals in Alaska, Maryland, Georgia, Louisiana and Texas all have far more set back from nearby cities and residences than the Jordan Cove proposal.

The lone exception is the terminal in Everett, Massachusetts, which is set in the middle of the Boston metro area. After 9/11 there were lots of news articles about how the federal government had woken up to the incredible risk this posed to Bostonians but it was a bit late to mitigate the risk without shutting down the terminal.

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North Bend and Coos Bay with a four kilometer radius from the Jordan Cove site.

Cumulative Impacts ignored

“Therefore, LNG vessel design and ocean transportation routes outside of the waterway close to shore will not be further analyzed in this EIS.” p. 2-76

The risks of catastrophic conflagration from LNG tanker accidents are completely integrated with the danger of the import / export terminal. No LNG tankers would travel into the port without the terminal and the terminal's operation depends on the tankers. Therefore it is a connected action and the combination needs to be examined, particularly the danger of tanker accidents upon the cities of Coos Bay and North Bend.

IND341-9

“2.2.3 Southwest Oregon Regional Safety Center
The SORSC would occupy approximately 8 acres on the east side of Jordan Cove Road, between the Trans-Pacific Parkway and the Roseburg Forest Products property, west of the South Dunes Power Plant. The building would house the Jordan Cove Fire Company, offices for the Coos County Sheriff, Coast Guard, and the Port, and a training facility for the Southwestern Oregon Community College. Although this building does not come under the jurisdiction of the FERC, this EIS analyzes impacts resulting from its construction.” p. 2-77

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If the impact of a school and police substation are considered as part of a cumulative impacts analysis, then the impact of ultrahazardous tanker ships in the channel must be considered, too.

page 1-21 suggests that indirect impacts of additional drilling induced by this "export" terminal are exempt from analysis. But considering that the project is supposed to have a "25 year" authorization of supply (p. 1-13), there needs to be at least a token effort to determine where this quarter century of gas is going to come from given the ongoing decline of conventional drilling and the approaching peak of fracked gas. Plus, the gas from Canada that this project is supposed to export comes from a region far colder in the winter than Oregon, and there has been mumbling in the Canadian press for years that they need this gas to heat their cities.

IND341-10

EIS reports about highway expansions frequently examine the issue of "induced traffic" caused by road construction (a problem that maybe less of an issue now that traffic peaked - nationally in 2007 and in Oregon in 2002). Similarly, to authorize a massive gas export terminal without even any consideration of the physical possibility of whether the trillions of cubic feet actually exist to export or not is a dereliction of duty to disclose relevant information for informed decision making as required by NEPA.

FERC, the US Department of Energy and all of the cooperating agencies need to examine the cumulative impacts of gas production for export in a SDEIS along with reasonable estimates of how gas supplies will or will not permit the export of any natural gas as conventional wells continue to decline and the fracking boom peaks and declines. FERC cannot approve an "export" terminal that is likely to flip back to import around the time that construction is expected to be completed. Construction of the pipeline alone would cause tremendous damage to forests and residences and the public need that supposedly justifies the eminent domain has to be grounded in a reality that there is enough fuel to send from the rest of the country (and/or Canada) to Coos Bay to export. Since numerous professional experts in geology and related fields have documented that this is false, the purpose and need for the project is negated and the supposed public interest in permitting the destruction of pipeline construction is invalid.

This is not an objection to more fracking to fill this pipeline. It is instead a simple request for a SDEIS to disclose how "export" of gas could happen as North American gas supplies decline during the project's lifetime. In the 2030s, we will be lucky to have enough to heat US cities during the winter, let alone send extra across the oceans.

reference: Council on Environmental Quality, "Considering Cumulative Impacts Under the National Environmental Policy Act," January 1997

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IND341-10 There is no evidence that exporting LNG from the Jordan Cove terminal would "induce" additional exploration and production. In fact, it is just the opposite. Recent increases in North American natural gas production resulted in the proposal to export LNG at the Jordan Cove terminal. See section 1.3 of the EIS; and response to CO1-1. The FERC does not regulate the exploration or production of natural gas; see section 1.4.4 of the EIS. Cumulative impacts are addressed in section 4.14.

<http://registerguard.com/rg/news/local/32573455-75/ing-site-contamination-ignored-whistleblower-says.html.csp>

LNG site contamination ignored, whistleblower says

By The Associated Press

DEC 20, 2014

PORTLAND — A biologist who worked for a consultant on the liquefied natural gas plant planned for Coos Bay has told federal regulators that engineers ignored and possibly hid contaminated soils issues at the site.

The allegations came in comments filed on the project's environmental analysis, now in draft form. The Oregonian reported Friday.

The Federal Energy Regulatory Commission has concluded that there will be limited environmental impacts from the \$7 billion gas-exporting complex, and they can be mitigated.

The project would be on the site of a former Weyerhaeuser paper mill. It would chill and condense natural gas piped from the interior of North America for shipment on vessels bound for Asia.

Plans call for dredging about 2.3 million cubic yards for a shipping berth and using the spoils for massive earthen berms to elevate the liquefaction plant and its accompanying power plant out of the tsunami inundation zone.

The biologist, Barbara Gimlin, said in her comments the contamination issues weren't disclosed in the analysis, nor reported to the Oregon Department of Environmental Quality until she called attention to them.

She says she supports the project but resigned in April from the consultant engineering company, SHN Engineers & Geologists, as a matter of professional integrity.

"I was stunned, just flabbergasted to find out that the DEQ hadn't been contacted at all," she told the paper. "It was inexcusable."

Gimlin said unidentified contaminated soils and sediment surfaced during excavations in an area that she had repeatedly been told was "clean fill" from previous channel dredging by the U.S. Army Corps of Engineers.

She said she learned that archeologists working on the site avoided work in one area after discovering soil they deemed contaminated, and she met resistance in her company when she asked whether environmental regulators had been informed.

Her boss at the company, Steve Donovan, said contamination issues are well understood and a plan is in place to deal with them.

Donovan acknowledged the soils were excavated and moved without notifying the Department of Environmental Quality.

"I'm not arguing with DEQ that we should have notified them, and in the future we will notify them more promptly," he said.

A hydrologist for the state agency, Bill Mason, said it sent Jordan Cove a warning letter after discovering that the contaminated soil had been pushed into a berm, covered and reseeded.

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Property impacts: whether import or export

The property impacts to landowners in and near the route are inadequately described in the Draft EIS. There's no discussion of the compensation that land owners would receive for partial condemnation of their property and how this would not mitigate the full impact of their property values. (Merely measuring the percentage of property that would be confiscated does not compensate for the loss of value). There is also no discussion of the loss of property value to nearby landowners who would bear the risk of accident (and the annoyance of construction and maintenance) but are adjacent to the route and therefore not entitled to compensation for eminent domain.

If the pipeline is approved despite the hazards to Ground Zero communities, at a minimum the pipeline project needs to odorize the gas so if there is a leak neighbors will know to sound the alarm, call the fire department and run for their lives.

There's no serious discussion in the Draft EIS of the real risk of landslides to the pipeline, especially the increased risk of landslides following clearcutting of mountain slopes for the pipeline.

The pipeline company needs to post a liability bond for the potential risks to the Coos Bay - North Bend area and communities along the pipeline route. An LNG terminal accident or pipeline rupture could easily cause severe damage to property and life; therefore, adequate financial resources need to be guaranteed to ensure that potential victims could be compensated if and when there is an accident.

While it is obvious that this "export" terminal is going to flip back to an import terminal once the fracking bubble bursts, this change in the project would not be of any consolation for those unfortunate to live near the terminal and pipeline, since the dangers would be the same regardless of the direction of travel of the gas. This similar danger does not absolve FERC and the cooperating agencies from disclosing the full extent of foreseeable impacts. FERC must be aware that fracked gas is a temporary phenomenon and even if the "export" gas is to come from non-fracked sources, the fracking bubble is allegedly so large that it enables this other gas to be exported.

IND341-11

IND341-12

IND341-13

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IND341-11 Impacts on landowners whose property would be crossed by the pipeline route, including effects on property values as well as the possibility of eminent domain, are discussed in section 4.9.2.3 of the EIS. Risks from pipeline accidents for adjacent landowners would be low. See the safety section in 4.13.

IND341-12 See the safety section at 4.13. Landslides are discussed in section 4.2.

IND341-13 The FERC does not require that either Jordan Cove or Pacific Connector post bonds. However, Jordan Cove's June 10, 2014 MOU with the ODE requires the posting of a bond to cover retirement costs. Also, both companies would have insurance to cover the unlikely event of an incident.

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<http://www.wunderground.com/news/natural-gas-pipeline-explosion-mississippi>
Mississippi Natural Gas Pipeline Explosion Picked Up By Radar

Sean Breslin

Published: January 14, 2015

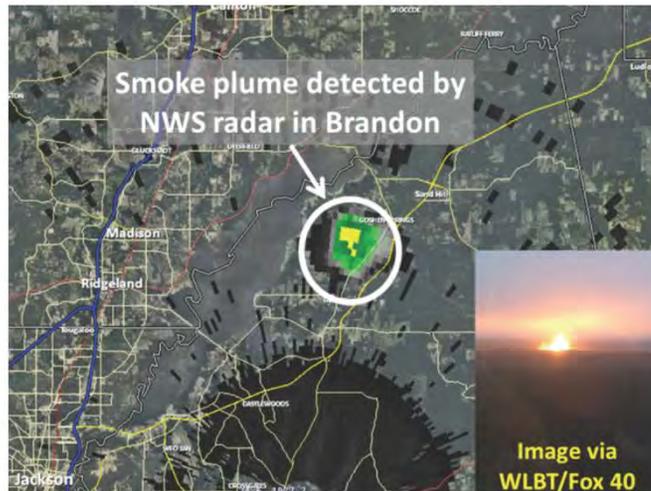


Taken from Skycopter by Jessica Golden, this image shows a torched forest following the explosion of a natural gas pipeline.
(Jessica Golden/MSNewsNow.com)

A natural gas pipeline near Jackson, Mississippi, burst into flames Wednesday morning, leaving wooded areas burned and a rare image on radar.

The blast spooked nearby residents, who saw the large, orange glow in the pre-dawn sky and began to ask about its origins on social media. Gulf South Pipeline confirmed the explosion was along a natural gas line east of the Barnett Reservoir, MSNewsNow.com reported.

The National Weather Service's office in Jackson noted that the smoke plume from the fire was picked up by local radar.



Did you know precip isn't the only thing our radar can see? This morning it detected smoke from a gas line explosion.
5:39 AM - 14 Jan 2015

No injuries have been reported from the explosion, Rankin County Emergency Operations Center spokesman Bob Wedgeworth told the Clarion-Ledger. The explosion occurred just after 6 a.m. Wednesday morning, according to WAPT.com. Residents near the fire said the explosion was so strong that it shook their houses. The fire burned for about an hour before Gulf South turned off the gas, the report added. Gulf South is investigating the cause of the blast, which is still unknown.

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Conventional Natural Gas in decline

Julian Darley's 2004 book "High Noon for Natural Gas: The New Energy Crisis" documented the start of the decline of conventional natural gas. He failed to anticipate the full size of the fracking boom that unfolded a few years after the book, but on the core issue of conventional gas it was completely correct. (Darley was founder of the Post Carbon Institute, which has done some of the best documentation of how the fracking bubble will be a rapid boom and bust.)

As discussed elsewhere in this comment, the fracking boom has been a tremendous increase but it has already drilled most of the "sweet spots." Two of the three largest fracking regions for shale gas have already peaked (Barnett in Texas, Haynesville in Louisiana and Arkansas), the largest one has not yet peaked (Marcellus in Pennsylvania).

The toxic impacts of fracking have received considerable attention. The movie "Gasland," countless environmental protests, petitions, media stories, and other efforts have documented the contamination of aquifers, poisoning of nearby wells, flammable gas into neighboring wells, noise nuisance, air pollution, forest clearing and other impacts.

The other half of the story is the exaggerated estimates of what can be extracted. Industry claims of "100 years of natural gas" available through fracking are just as false as previous claims that nuclear power would be too cheap to meter. In reality, fracking is a short term boom and bust, fracked wells deplete far faster than conventional wells, fracked wells require far more energy, money and technical talent than conventional wells, and fracking is approaching its peak even while conventional gas is declining.

Part of the gas crisis is rooted in overusing natural gas for electricity. Gas seems like a good substitute for burning coal for electricity. Its combustion is cleaner than coal (although not as clean as gas company advertisements claim). It's easy to permit under the Clean Air Act. Installing gas burners for electricity is relatively simple. It's easy to throttle the generators up and down to balance electric demand on power grids. But these attributes obscured the fact that there was not an infinite supply of gas to use for electricity -- the natural gas distribution system was only so large. It was sized for heating cities in the winter, for cooking, other residential uses, industrial applications, making synthetic fertilizer and chemicals. Adding another huge use seemed like a great idea unless one considered the actual sizes of the gas reserves.

The fact that a substantial part of US natural gas comes from offshore drilling in the Gulf of Mexico - a shift well underway before fracking - is a simple way to understand that the easiest to extract fossil fuels are now replaced by more difficult to extract

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energy sources. Running a major part of the electric grids on natural gas exacerbated these supply problems, which led to fracking. Fracking is not an energy renaissance, it is merely a stay of execution that has delayed rationing.

Natural gas can only be burned once. This seems self evident, yet there are plans to keep increasing applications for natural gas despite the decline of conventional drilling. One of the silliest is from oil magnate T. Boone Pickens, who wants to add transportation to the list of things that gas needs to power. There are governments, non-profits and others who echo this desire yet where additional gas is going to be found -- or how fast this additional use would deplete gas fields - is not discussed by the advocates.

Marcellus in Pennsylvania is the "Saudi Arabia" of fracked gas, but even the US Department of Energy estimates it may peak at the end of this decade. When that happens, the fracking gas bubble will clearly be burst. pickens plan - use it for transport, too - not possible (although he'll try to make money doing that)

A few suggestions for clarity in the face of finite fossil fuels:

We need to recognize depletion is a reality and plan accordingly.

Plans to export oil, coal and gas are based on false assumptions of supply and should be canceled.

We need a global cooperative, civilization wide effort for massive efficiency programs to reduce energy demand, including insulation of buildings, solar design for structures, relocalization of the global factory, relocalization of agriculture and thousands of other efforts to ensure social stability as the fossil fuels go into decline. Waiting for no fossil fuels and then shifting would be disastrous. The real crisis kicks in as we pass the limits to growth -- about now -- not when it's all gone. The oil wells are half full and half empty - we can no longer continue doing what we are doing but there's still plenty of resources to be used to mitigate descent so the future after fossil fuels will be simpler and pleasant and not a worst case scenario.

200 mile linear clearcut

The Supplemental EIS also needs to examine impact of 200 plus mile long clearcut, including through old growth forest, interior forest habitat and the climate impacts of this deforestation. Deforestation emits carbon and methane, and also disrupts the hydrologic cycle.

IND341-14

IND341 Continued, page 35 of 38

IND341-14 This is not a Supplemental EIS. The current EIS assesses the impact of construction and operation on old-growth forests and forest habitats (see Section 4.5, 4.6, and 4.7) and climate change (see Sections 4.14.3.12 and 4.12.1.4).

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The impact of carcinogenic, mutagenic, teratogenic chemicals used to prevent vegetation along the pipeline route need to be examined. In addition, the ethical implications from an environmental justice perspective need to be disclosed and discussed, along with consideration of the Nuremberg Code on Human Experimentation, a federal requirement that prohibits involuntary participation in medical experiments. Citizens who do not wish to be subjected to the risks of a giant, high-pressure, non-odorized pipeline through their properties, nor the constant application of biocides to prevent vegetation regrowth should be permitted to opt out of these experiments on physical and psychological well being. The impacts of these chemicals needs to include disclosure of the synergistic impacts of these chemicals in combination plus non-cancer impacts such as hormonal disruption. The book *Our Stolen Future* by the late Theo Colburn would be a good reference for beginning this part of the SDEIS.

IND341-1E

IND341-1B

New Mexico gas crisis, 2011

On Sep 4, 2011, at 8:55 PM Sep 4, Paul wrote:

Hi Mark,

Last winter in NM, the gas pipe running north up the Santa Fe Valley was shut off to preserve adequate pressure for the city of Santa Fe, so all the towns served by that pipe, including Taos, were totally without gas for 5-7 days. The National Guard and the state police received quickie training in how to bleed lines and turn individual house gas service back on when the line was repressurized. Shelters were set up in Taos for residents who had only gas heat, but it was difficult for the Red Cross to find adequate shelter locations that didn't need gas for heat.

I was there. I stayed at a friend's who had a small wood fireplace and an electric hotplate, so we survived a very cold week.

Not only was some industry temporarily shut down, but hundreds of homes and small businesses (if not thousands) were left temporarily without gas during a period of record low temperatures.

http://www.taosnews.com/news/article_510b1732-81d1-5530-89e8-7fd7ccced59.html

Paul

Jordan Cove LNG EIS

33

Mark Robinowitz - PeakChoice.org

IND341 Continued, page 36 of 38

- IND341-15 The use of herbicides, as well as the restrictions and regulations imposed on their use, is discussed in the EIS.
- IND341-16 The Environmental Justice analysis in the DEIS was conducted as required by federal law. The project is not an involuntary medical experiment as alleged in the comment. Transporting gas through pipes is not a new development with untested impacts. This United States is criss-crossed by several hundred thousand miles of gas pipelines and has been for decades, as have other countries in the developed world. The effects are well known. See section 4.13.9.2 for information on pipeline accidents.

YOU CANNOT EXPORT FUEL THAT DOES NOT EXIST

The rush to export is based on the idea that there is abundant oversupply of energy resources that could be sent to Asia, but the geological reality suggests this is irrational exuberance.

Richard Heinberg's book "Blackout: Coal, Climate, and the Last Energy Crisis" is a rare look at how coal supplies are smaller than most people think. There is enough to further foul the air but not enough to continue growth of combustion, certainly not hundreds of years worth. Peak Coal is either near or here.

A 2009 report from Clean Energy Action notes that "Between 2002 and 2008, while coal costs were rising dramatically, the US Geological Survey reduced the amount of economically accessible coal in the Gillette coal field of the Powder River Basin [in Wyoming] from 23 billion tons to 10 billion tons." This makes coal export less likely.

Furthermore, to export coal from Wyoming via Coos Bay, trains would have to move past Portland, which has much better export terminals. The Eugene to Coos Bay rail route is winding, hilly and slow. Heavy coal trains are more likely to use better tracks to reach ports with greater shipping capacity. The Army Corps of Engineers is reviewing a proposal to set up a transfer station from trains to barges for the Port of Morrow, next to the Boardman coal burning power station in eastern Oregon. If this is built it would avoid congested freight rails in the Port of Portland that are already clogged with imports from Chinese factories.

The Western Power Grid stretches from Tijuana to B.C. to Denver. Half of the electricity comes from coal which is still the backbone of the grid. Obama is pushing "clean coal" which is just greenwashing more coal combustion, including new "cleaner" coal burners.

One motive for the notorious Appalachian mountaintop removal is to extract thinner coal seams that are hard to mine via conventional techniques. Parts of the Appalachians have depleted coal mines with tailings that leach sulfuric acid into river headwaters (the Potomac River headwaters is one example).

Exaggerations of coal, natural gas and oil supplies not only boost stock values of energy companies but also underlie false estimates of future economic growth, since more fossil fuels would mean more economic activity. Richard Heinberg's book "The End of Growth: Adapting to Our New Economic Reality" is a useful antidote.

In July 2010, Robert F. Kennedy, Jr. told a crowd at McDonald Theater that we could replace coal generated electricity with natural gas but political problems were the obstacles for the conversion. However, Peak Natural Gas in the US was 1973. The US imports about half of Canada's natural gas production. Replacing coal electricity with natural gas is not possible unless we stop heating homes with gas.

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Shale gas "fracking" has temporarily increased US production, but claims that this could provide 100 years of supply are extreme exaggerations. The toxic impacts of fracking have finally received public scrutiny -- the documentary Gasland is an excellent summary -- but the fact that fracking wells deplete much faster than conventional drilling has not gotten as much attention.

The only reason anyone is floating the idea of exporting US coal to China is the illusion that there is so much natural gas that we can replace some of the coal with gas. The Port of Morrow proposal for transferring coal from trains to barges is supposed to become active in 2016. Geologist Art Berman, an industry insider who has examined shale gas fracking, estimates that the fracking bubble may burst around that time. When shale gas is no longer a bubble, plans to shift more coal to gas will go up in smoke and the export proposals go away, too.

In the winter of 2010 / 2011, natural gas delivery systems broke down in New Mexico during a cold snap when there wasn't enough gas to go around. Some small towns were shut off from gas supplies.

The new LNG import terminal in Baja California is providing gas for US electric generators. Supporters had tried San Francisco and Humboldt Bay before building in Mexico. As gas supplies tighten there will be more pressure for LNG imports.

In 2001, Enron partnered with Coburg Power to build a huge natural gas powered electric generator north of Eugene. It would have been at the intersection of the main electric power line for Lane County where it passes over the natural gas pipeline. After Enron pulled out (they went bankrupt for other reasons), I asked the primary promoter where the station's fuel would come from. He replied it would tap into the pipeline. I then asked where extra fuel would come from since the gas in the pipeline was already heating existing homes and businesses and he had no reply. Coburg Power never got built.

If there is any export of coal and / or natural gas through Coos Bay it is unlikely to last long since we cannot export fuel that does not exist. Will the federal government even allow fossil fuel exports as the permanent energy shock intensifies, since export would let US cities have brownouts and blackouts to provide power for Tokyo, Seoul and Beijing?

Fossil fuel depletion will force reductions in energy use. Hoping to switch from one poison to another delays the inevitable "power down." Renewable energy is great but it could power a smaller, steady state economy, not the illusion of "green growth."

IND341-17

IND341-18

IND341 Continued, page 38 of 38

IND341-17 The U.S. Department of Energy has granted the applicant the rights to export gas to both Free Trade, and Non-Free Trade countries. Decisions regarding the authorization of gas exportation to other contrives is outside the authority of the FERC.

IND341-18 This comment letter contained attachments that did not directly comment on the DEIS. These attachments have been reviewed and any relevant information found was incorporated into the analysis as applicable; however, the attachments are not included in this Appendix to the FEIS. The entire comment letter, including these attachments, is available on the eLibrary filed under accession number 20150213-5299.

20150213-5121 FERC PDF (Unofficial) 2/13/2015 12:19:10 PM

IND342

Mark D. Burnap, Coos Bay, OR.
comments on FERC's DEIS, Feb 12th, 2015

1 The 5,000pgs makes the DEIS impossible for the public to comment against. The DEIS is an incredibly complicated and convoluted wall of words seemingly designed to help push through this project. It seems more geared toward why Coos Bay is the only suitable site, dismissing other sites out of hand. The DEIS sounds like it's a done deal all through it.

IND342-1

2 The NEPA is designed to ensure that the public gets a say in projects that are proposed no matter where they're to be done, or in their backyard. The 5,000pg DEIS makes this impossible for that and is a clear violation of that public trust in the process of the NEPA.

3 Included in the site at Coos Bay is the need to build a 420megwatt power plant to exclusively run the facility at the Jordan Cove LNG Terminal. The plant is needed to freeze the natural gas so it can be loaded onto ships that are 3 times as large as any current merchant vessels now calling into Coos Bay. Yet the site in Warrington, OR has readily available power from clean renewable Hydro-electric power, directly off the grid already in place from Bonneville. So not only the energy and resources to build the new plant is lost to a facility that won't even put electrical power onto the grid for the rest of Oregon to use. Ultimately, who'll pay for this, to only expend and produce all of this for an export only site where the benefits of this electrical power and resources used goes to other countries? The DEIS completely dismisses other sites that don't need CO2 emitting power sources contribution to proven climate changing sources with other pollution into the atmosphere.

IND342-2

4 How does this Jordan Cove benefit to Coos Bay/North Bend area at all or the rest of the nation, the gas is mostly or entirely Canadian gas? The labor force that would build these sites at Jordan Cove will come from skilled union workers from somewhere else. This proposal won't bring jobs to a economically stressed area of So. Oregon with high unemployment, or bring industry here to provide jobs if the terminal is export only. The site and its facilities will adversely impact us socially by bringing the 2 or 3 thousand plus workers to camp out on the outskirts of North Bend residential neighborhoods. Ever consider doing a social impact assessment on that?

IND342-3

As to security issues and the overall placement of the Jordan Cove LNG Terminal, the site is across the bay from an airport less than a mile away. Also the site is in the Cascadia Subduction Zone and the So. Oregon coastal region is overdue for a 7 or 8+ on the Richter scale subduction quake and resulting tsunamis. The site would be built on sand that will possibly subside down in elevation maybe 10ft or so, or the probability that the sand during a subduction event will swallow anything built on it due to liquefaction from the quake.

IND342-4

(See reference below)
The Oregon Resilience Plan - Cascadia: Oregon's Greatest Natural Threat, February 2013 1
1. Cascadia: Oregon's Greatest Natural Threat
Introduction
"When, not if, the next great Cascadia subduction zone earthquake strikes the Pacific Northwest, Oregon will face the greatest challenge in its

IND342 Mark D. Burnap, Coos Bay, OR

- IND342-1 The document size is not a violation of NEPA. The EIS analyzes very complex issues. These include the LNG terminal, the 232-mile pipeline, 400 waterbody crossings, and federal land management plan amendments that would be required if the Project is approved. These complex issues cannot be adequately analyzed in a short, compact document, as has been recognized by the courts for many years.
- IND342-2 Comment noted. See chapter 3 for a discussion of the alternatives considered.
- IND342-3 The effects of up to 1,800 workers on the community is analyzed in section 4.9.1 and 4.9.2. It is estimated that about 244 non-local workers with families (a total of 317 people) and about 792 single workers would relocate to the area for approximately 2 years.
- IND342-4 The DEIS discusses Tsunami hazards, liquefaction and subsidence issues in section 4.2. DOGAMI data from 2014 is included in the analysis. The FAA is responsible for airport safety. Their approval would be required, as disclosed in section 4.10.1.4 of the DEIS, see the recommendation in that subsection.

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history. Oregon's buildings, transportation network, utilities, and population are simply not prepared for such an event. Were it to occur today, thousands of Oregonians would die, and economic losses would be at least \$32 billion. In their current state, our buildings and lifelines (transportation, energy, telecommunications, and water/wastewater systems) would be damaged so severely that it would take three months to a year to restore full service in the western valleys, more than a year in the hardest-hit coastal areas, and many years in the coastal communities inundated by the tsunami. Experience from past disasters has shown that businesses will move or fail if services cannot be restored in one month; so Oregon faces a very real threat of permanent population loss and long-term economic decline."

Ref. The Oregon Resilience Plan, Cascadia: Oregon's Greatest Natural Threat, February 2013 1, pg.1

Web ref http://www.oregon.gov/OMD/OEM/osspac/docs/01_ORP_Cascadia.pdf

5 The transit and docking of the LNG ships will require an escort by the USCG and a security perimeter of 1 mile, neat trick in areas of the bay that get a little skinny. What impacts will this do to the commercial and recreational vessels already here?

IND342-5

6 Even though the vast majority of the DEIS is dedicated to an evaluation of the project as proposed by Jordan Cove, the analysis of two major aspects of this alternative is insufficient. One aspect of the project has received almost .

7 The pipe line involved to bring the gas to Jordan Cove will be over 240 miles as opposed to only 86 miles to Warrington? This will severely impact every stream and the land it covers, along with the possibility of adversely impacting the threatened or endangered species of fish in the streams, forest fire, damage to water quality, etc.to the rest of flora and fauna (which includes humans) when a quake or mishap occurs when the pipeline breaks or leaks.

IND342-6

IND342 Continued, page 2 of 2

IND342-5 Impacts to commercial and recreational boating are discussed in sections 4.8 and 4.9.

IND342-6 Impacts to listed species are addressed in section 4.7 of the DEIS. Impacts to general plants and wildlife are addressed in sections 4.5 and 4.6. Safety and reliability are addressed in section 4.14.

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IND343

Diane p Shockey, Eagle Point, OR.
The Pacific Connector Gas Pipeline project is being constructed, in part,
by Pacific Gas and Electric. PG & E has been cited for thousands of
violations with fines in the millions, even billions of dollars in the
maintenance neglect of their pipelines and their improper recordkeeping.

In the recent past, the Army Corps of Engineers has been held responsible
by the courts for failing to properly analyze impacts of other projects.
Additionally, the Army Corps of Engineers does not have the appropriate
staff to oversee the many facets of this complicated proposal and will
rely on consultants. One former consultant turned whistleblower has
already come forward with information that could show that consultants
are hiding information that would negatively impact the certification of
this project.

IND343-1

Past behavior is the best predictor of future behavior. PG&E, the Army
Corps of Engineers, and probably some consultants have proven they are
currently not up to the task of properly constructing this proposed
pipeline. Many states' natural resources and have already been negatively
impacted and deaths have occurred because of shoddy work, incomplete
documentation and, in some cases, misinformation by these very
governmental and private companies.

Oregon one of the last pristine forests in the country. It is too
valuable as a timber asset and too many businesses are dependent on
forests recreation to rely on this DEIS for FERC certification. I implore
FERC to deny any certification of the LNG pipeline as proposed in this
DEIS.

IND343-2

IND343 Diane P. Shockey, Eagle Point, OR

IND343-1 Comment noted.

IND343-2 Comment noted.

20150213-5127 FERC PDF (Unofficial) 2/13/2015 12:35:23 PM

IND344

Bonnie Joyce, Myrtle Point, OR.
In the DEIS for Jordan Cove LNG Terminal I do not see an analysis of the cumulative effects of 2,100,000 metric tons of CO2 that are projected to be released into the atmosphere by this project. According to the National Environmental Policy Act, this EIS needs to include a baseline study of the present amount of CO2 in the atmosphere, and the effects of the additional CO2 that this project, including the fracking operations, will release.

IND344-1

IND344 Bonnie Joyce, Myrtle Point, OR

IND344-1 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.

The scope of the project does not include drilling for natural gas; the proposed action is the transportation of natural gas in a pipeline from Malin to the Jordan Cove terminal in Coos County, where the natural gas would be liquefied into LNG. Furthermore, exploration and production of natural gas (i.e., drilling and processing natural gas) are not activities regulated by the FERC.

20150213-5128 FERC PDF (Unofficial) 2/13/2015 12:48:12 PM

IND345

Richard T Goergen, Coos Bay, OR.
February 12, 2015

To: Federal Energy Regulatory Commission
Secretary Kimberly Bose
Deputy Secretary Nathan Davis, Sr.

RE: Jordan Cove Energy Project (CP13-483-000)
Pacific Connector Gas Pipeline (CP13-492-00)

Dear Secretary & Deputy Secretary:

Boost Southwest Oregon is a grass roots organization with over 1200 members based in Coos Bay, Or. Our membership is comprised of local elected officials, business owners, organized labor, educators, retirees, families and individuals whom are all concerned about our region's economic future.

Our membership includes people working and/or residing in virtually all of the communities along the proposed pipeline route and of course Coos Bay - North Bend where the proposed Jordan Cove Energy Project (JCEP) will be sited. As Boost Southwest Oregon's Secretary, I am charged with submitting our organization's formal comments in favor of these projects for the following reasons:

1. Job creation. Over 2000 construction jobs and 750 permanent jobs (direct & indirect) will be created. These will be family wage jobs paying prevailing wages. Also, apprenticeship opportunities will be provided to candidates interested in the trades tasked with constructing these projects.

IND345-1

2. The International Port of Coos Bay will directly benefit from channel improvements and the second ship berth developed by Jordan Cove. These assets will enable our Port to further develop and attract other water dependent industries to their land base on the North Spit. An opportunity for the Port and our community which would not exist otherwise.

IND345-2

3. Funding the Community Enhancement Plan (CIP). Under agreement with Coos County, the Cities of Coos Bay, North Bend and the International Port of Coos Bay, JCEP will make payments in lieu of property taxes that are projected to fund approximately \$200,000,000 during the construction phase and first 15 years of operations. These funds will benefit our schools via the South Coast Community Foundation; water front development & revitalization thru the Bayfront Investment Corporation; Coos County Government; SW Oregon Community College; International Port of Coos Bay; Southwest Oregon Regional Airport; Library Service District; North Bay Rural Fire Protection District and our 4H & Extension Service. All will reap significant financial benefits from the Community Enhancement Plan supported by this project.

IND345-3

IND345 Richard T. Goergen, Coos Bay, OR

IND345-1 Comment noted.

IND345-2 Comment noted.

IND345-3 Comment noted.

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IND345 Continued, page 2 of 2

IND345-4 Comment noted.

4. LNG Fire Training Center. Jordan Cove will be partnering with the Southwest Oregon Community College to create the first LNG Fire Training Center on the West Coast. As expanded use of LNG as a maritime and surface transportation fuel increases, the need for special LNG training is obvious and important to the LNG Industry. The closest competing program is in Texas.

IND345-4

In closing, I and a number of our members have reviewed the DEIS and/or Executive Summary and concur with FERC staff that the project's environmental impact's will be temporary and relatively minimal in nature. We support the permitting process and have confidence in FERC's regulatory oversight to ensure that a safe project is designed, built and operates according to any specific conditions deemed appropriate.

Again, on behalf of our Executive Board, Steering Committee and membership, I affirm our support for the Jordan Cove Energy Project and Pacific Connector Gas Pipeline.

Sincerely,

R. Todd Goergen, Secretary
Boost Southwest Oregon
www.boostsouthwestoregon.org

20150213-5135 FERC PDF (Unofficial) 2/13/2015 12:44:29 PM

IND346

February 13, 2015

FERC,

As a second generation landowner and farmer, and one directly affected by the current proposed Jordan Cove pipeline route between MP 11.1R and 21.8, in Coos Bay, OR, I am once again writing to encourage you to rethink your movement away from the Blue Ridge Route.

I am confused about the statements in the Draft EIS that refer to the current route as being "significantly" better than the Blue Ridge route. I am now aware of a land slide on my property that would make any potential pipeline project a huge liability to my family. My house would be located within 200 feet of the proposed pipeline, and with this landslide, I fear that my house and my family will be at risk. The land that surrounds my house is essentially marsh land, and is susceptible to flooding and movement. How is FERC going to guarantee the safety of a 36" pipeline in my property, when the ground itself is beginning to give way? Our ground is able to sustain the effects of massive rain, as internal drainage ditches have been installed years ago, as a way to drain the water. Williams, and FERC have not shown that they are aware of these internal drainage fields, and are potentially willing to risk ruining these systems. My neighbor's field is a fresh example right now of what happens when one of these internal drainage systems is compromised. If the drainage systems are ruined, the fields simply fill up with water and cannot drain. This would mean that Williams and FERC are willing to ruin the drainage systems of these fields, not only limiting my agricultural use, but also compromising the health of the pipe.

IND346-1

FERC, our local fire department is based off of volunteer commitments, and any potential crisis with the pipeline would be fatal for my family. FERC cannot say that pipeline explosions do not put people at risk, as one just has to GOOGLE recent explosions to see the breadth of the damage they can cause. The most recent pipeline explosion, to my knowledge, was in January of 2015 in Mississippi. This explosion, luckily, did not harm any human beings, but it caused great environmental damage. How is FERC able to say that the threat to the wildlife in the proposed route is minimal, when the threat to human life is immense?

IND346-2

FERC also fails to mention the disruption of my farming activities that would occur if the pipeline crosses 75% of my property, and how my livelihood will disappear.

IND346-3

If FERC were to choose the Blue Ridge Route, these issues would disappear.

IND346-4

It is for these reasons, and others that I am in favor of the **Blue Ridge Route**, and urge you to take a stand to defend the affected landowners in this way. My family continues urge others to join me in support.

IND346-5

Thank You,

Curtis Pallin

Curtis and Melissa Pallin: 62225 Catching Slough Rd., Coos Bay, OR 97420

IND346 Curtis Pallin, Coos Bay, OR

- IND346-1 Alternatives and routing decisions are discussed in chapter 3 of the EIS. The moderate hazard landslide at MPs 18.1 to 18.2 is discussed in Landslide Hazards Avoidance and Minimization of Adverse Effects section (page 4-269 of the DEIS). As stated in this section, additional ground-based study would be performed prior to the final design of the pipeline in this area. In addition, monitoring protocols during operation of the pipeline would ensure that any potential hazards are discovered and addressed to prevent damage to the pipeline, as well as other structures and environmental resources.
- IND346-2 Pacific Connector would be required to repair or replace any pipes damaged during construction. See section 4.9.2.3 of the DEIS.
- IND346-3 The DEIS does not say that pipeline explosions do not occur only that they are rare in relation to the hundreds of thousands of miles of gas pipelines in the country. Section 4.1.9.2 of the DEIS presents pipeline accident data.
- IND346-4 Impacts on landowners whose property would be crossed by the pipeline route, including effects on property values as well as the possibility of eminent domain, are discussed in section 4.9.2.3 of the DEIS. Compensation for damages would be negotiated by Pacific Connector with individual landowners.
- IND346-5 Your preference for the blue ridge route as you believe it to be the less environmental impact route is noted.

20150217-5025 FERC PDF (Unofficial) 2/13/2015 11:01:22 PM

IND347

IND347 Elsan Zimmerly, Florence, OR

IND347-1 The DEIS discloses the likely Tsunami hazards, earthquake, liquefaction and subsidence issues in section 4.2.

Elsan Zimmerly, Florence, OR.
The draft EIS for the Jordan Cove LNG project poorly addresses several hazards to public safety. It significantly underestimates the critical hazards to the environment and people. The draft EIS does not address the critical importance to people of the impacts should the Oregon coast experience a 9.0 or greater earthquake. Bridges, Highway 101, North Bend and Coos Bay will be severely damaged or destroyed in the event of a 9.0 or greater earthquake. Profit at the expense of public safety? No.

IND347-1

BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Jordan Cove Energy Project, L.P.) Docket No. CP13-483-000
Pacific Connector Gas Pipeline, L.P.) Docket no. CP13-492-000

COMMENTS OF DENNIS HENDERSON AS AN INDIVIDUAL AND AS
TRUSTEE OF THE HENDERSON REVOCABLE INTER-VIVOS TRUST ON
THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dennis Henderson in his capacity as individual and in his capacity as trustee of the Henderson Revocable Inter-Vivos Trust (Henderson) hereby submits the following comments on the draft environmental impact statement ("DEIS") issued in the above-referenced proceedings.

1. Communication and Correspondence

All filings, orders and correspondence in this proceeding should be directed, electronically, to the following attorney and law firm which represents Henderson in these proceedings:

R. Scott Jerger
Field Jerger LLP
621 SW Morrison, Suite 1225
Portland, Oregon 97205
Phone: (503) 228-9115
Fax: (503) 225-0276
scott@fieldjerger.com

2. Henderson's Property and Eminent Domain

On May 21, 2013, Jordan Cove Energy Project L.P. (Jordan Cove) filed an application with the Commission, pursuant to Section 3 of the Natural Gas Act seeking authorization to site, construct and operate a liquefied natural gas (LNG) export terminal on the bay side of the North Spit of Coos Bay in unincorporated Coos County, Oregon, to the north of the cities of North Bend and Coos Bay.

On June 6, 2013, Pacific Gas Connector Pipeline L.P. (Pacific Connector) filed an application with the Commission, pursuant to Section 7 of the Natural Gas Act seeking, among other approvals, a certificate of convenience and necessity (CCN) authorizing the construction and operation of a 236-mile natural gas pipeline from Malin to Coos Bay,

Henderson DEIS Comments-1

20150213-5139 FERC PDF (Unofficial) 2/13/2015 12:15:03 PM

IND348 Continued, page 2 of 11

Oregon. This pipeline traverses directly over Henderson's property in rural Douglas County.

Henderson owns a 34.6 acre parcel of real property, with a residential dwelling, in Douglas County generally described as lying in part of the SE ¼ of the SE ¼ East of the road in Section 6, Township 30, Range 3 West of the Willamette Meridian, also known by the Douglas County Assessor as Parcel Numbers: R18618 and R18626. The land contains portions of two waterways, Days Creek and Fate Creek, both of which flow into the South Umpqua River.

Pacific Connector's proposed natural gas pipeline will traverse directly over Henderson's property, immediately south of the residence. According to Pacific Connector, the proposed pipeline will affect 4.949 acres of land and the permanent Right of Way will impact 1.084 acres of Henderson's property. Under the Natural Gas Act, 15 U.S.C. §717(f)(h), should the FERC issue a CCN to Pacific Connector, Pacific Connector may acquire Henderson's private property by right of eminent domain.

Pacific Connector determined that the equitable purchase price to acquire the property rights needed to construct, maintain and operate a pipeline on the Henderson land is \$3015,26. This proposed valuation vastly undervalues the loss of property and enjoyment that Henderson will suffer if Pacific Connector is allowed to acquire rights to the land through a condemnation proceeding. Pacific Connector's valuation is based on a flawed determination of the price of bare land which undervalues rural land in this area of Douglas County. It also ignores the fact that the pipeline right of way will be located immediately south of the residence and will impact Henderson's use and enjoyment of the property. The DEIS does not adequately address private property condemnation and Pacific Connector's use of eminent domain and its impact to private landowners.

IND348-1

IND348-1 Impacts on landowners whose property would be crossed by the pipeline route, including effects on property values as well as the possibility of eminent domain, are discussed in section 4.9.2.3 of the DEIS.

3. Pipeline Comments

A. The DEIS fails to analyze whether the pipeline will provide a Public Benefit

Section 7 of the Natural Gas Act, 15 U.S.C. § 717(f), requires the Commission to determine whether there is a public necessity for the pipeline and that it is for the convenience of the public. The FERC confirms that it must verify the public benefit of the Project in the DEIS:

"A FERC Certificate would verify that the Project has a public need and provides significant public benefit." DEIS 4-163.

"The Commission will consider the need and public benefit of this project when making its decision on whether or not to authorize it...". DEIS, Appendix H, page 15.

Henderson DEIS Comments-2

The Commission that will consider the need and public benefit of this Project". DEIS 3-63.

The DEIS, however, specifically fails to analyze at all whether the project is in the public's benefit. This is important because it is not obvious why there is a public benefit to U.S. citizens from an LNG terminal built to exclusively export gas to Asia. The FERC states that a determination of public benefit is outside the scope of the DEIS. DEIS 1-20. ("With regard to the public benefit or need to export LNG from the United States to foreign nations, that decision rests with the DOE, and is therefore outside of the jurisdiction of the FERC.")

IND348-2

Under the National Environmental Policy Act ("NEPA"), the FERC is required to analyze whether this project is consistent with all applicable and relevant laws and regulations. 40 C.F.R. §§ 1502.2(d); 1508.27 (10); Oregon Natural Desert Ass'n v. BLM, 625 F.3d 1092, 1109 (9th Cir. 2010). The public benefit analysis of Section 3 of the NGA is one of those laws. By failing to analyze whether the project has a public benefit in the DEIS, the FERC violated NEPA.

IND348-3

And it appears as if the project is not in the public benefit. Eminent domain was established to promote projects that have a public use and necessity. Here, more than 90% of the private landowners, including Henderson, along the 230-mile long pipeline rejected the initial offers made by Pacific Connector in the summer of 2013. Many of the landowners do not want a high-pressure, 36" un-odorized gas pipeline near their homes, especially as they hear about pipeline explosions on the nightly news.

B. The DEIS fails to accurately analyze the Purpose and Need for the Pipeline

The DEIS states that a primary purpose of the pipeline is to "supply additional volumes of natural gas to markets in Southern Oregon." DEIS at 1-13. "Pacific Connector intends to deliver about 40 million cubic feet of natural gas per day to Northwest's existing Grants Pass Lateral through an interconnection with the proposed Clarks Branch Meter Station." *Id.*

Yet, it is completely unclear that any gas will be supplied to southern Oregon. The DEIS fails to disclose how much natural gas will be withdrawn from the Grants Pass Lateral, through the Coos Bay 12" line that is north of the site of the Clarks Branch Meter Station. If Jordan Cove uses 40 million cubic feet from the Grants Pass Lateral through the 12" Coos Bay line, and then puts 40 million cubic feet back in at Clarks Branch, then no extra gas would be delivered to southern Oregon. At the FERC public hearings at Canyonville, Mr. John Clark testified and presented paperwork showing Jordan Cove having a contract to remove as much natural gas from the Grants Pass Lateral (via the Coos Bay 12" line) as Jordan Cove claims it will put back in.

IND348-4

Henderson DEIS Comments-3

IND348 Continued, page 3 of 11

IND348-2 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND348-3 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND348-4 The Project includes providing approximately 40 million cubic feet of natural gas per day to Northwest's existing Grants Pass Lateral, see section 1.3. The Clarks Branch Meter Station (described in section 2.1.2.2) would connect with the Latera and provide odorizing facilities, and other facilities. The station is included in the project analysis. Cumulative effects are addresses in section 4.14, see the section introduction for a discussion of the analysis area for cumulative effects.

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The DEIS violates NEPA by failing to disclose and analyze whether the project will actually and realistically provide any gas to southern Oregon, one of its primary stated purposes.

IND348-4
Cont'd

C. The DEIS fails to analyze and disclose the scope of a "blanket certificate"

According to the DEIS, Pacific Connector requests a blanket certificate to allow for future construction, operation, and abandonment activities under Subpart F of Title 18 Code of Federal Regulations (CFR) Part 157 of the Commission's regulations, and requested a blanket certificate to provide open-access transportation services under its tariff in accordance with Subpart G of Part 284. Requests for these future actions performed under the blanket program are restricted to minor actions and would be filed as prior notices or in annual reports that would be subject to individual environmental reviews by FERC staff in accordance with Part 157.206. DEIS at 1-1.

Yet, the DEIS fails to define a "minor action" or the scope of such a blanket certificate. Landowners such as Henderson are therefore subject to undefined "minor actions" that have been approved by FERC in advance without any oversight or environmental review. These actions could include ground-disturbing, invasive activities such as construction of improvements. By failing to analyze and define a "minor action" before issuing a general "blanket certificate" the FERC has failed to take a hard look at Pacific Connector's future construction, operation and abandonment activities.

IND348-5

D. The DEIS fails to consider Rural Public Safety Standards

The DEIS fails to consider the impacts from different safety standards that are required for pipelines in rural areas. Most of southern Oregon is in a "Class 1" location because there are 10 or fewer buildings on a one-mile length of pipeline. This could put rural Oregonians such as Henderson in greater danger than people in urban areas.

IND348-6

Examples of how southern Oregon would be treated differently than urban areas include:

- * Fewer welds are required to be inspected or tested, 10% verses, 100% in urban areas.
 - * Thinner pipes are permitted.
 - * No internal inspections are required on the pipeline once it is in the ground.
 - * Pipelines are buried 6" higher.
 - * Maximum distance to block valves is greater.
 - * Hydrostatic test pressures are weaker.
 - * Maximum allowable operating pressure is greater.
 - * Frequency of pipeline patrols and leak surveys are less often.
- 49 C.F.R. § 192.

Henderson DEIS Comments-4

IND348 Continued, page 4 of 11

IND348-5 As noted in chapter 1, Subpart F of Title 18 Code of Federal Regulations (CFR) Part 157 of the Commission's regulations, and Subpart G of Part 284 define "minor actions."

IND348-6 The DOT, not FERC, regulates pipeline safety, they establish the standards associated with Classes 1 through 4. The DEIS disclosed the DOT requirements.

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IND348 Continued, page 5 of 11

The DEIS again fails to analyze impacts from these standards to the human environment by stating that the Department of Transportation, not the FERC sets the standards. DEIS 4-986. Yet, the FERC must still analyze the impact of these relaxed standards on rural areas under NEPA.

Out of the 230 miles of the proposed Pacific Connector pipeline, 212 miles are in a Class 1 location (2009 FEIS pages 4.12-54-56), allowing Pacific Connector significant cost savings in pipeline design.

Weaker standards are allowed even though there are significantly more inherent risks in Oregon's rural areas. The route through southern Oregon is over the unique geological features of the rugged Cascade and Coastal mountain ranges, including steep and unstable slopes, rocky terrain, with earthquake and high forest fire potential areas.

E. Pacific Connector should post a bond

FERC is requiring Jordan Cove to provide a bond to retire the LNG facility. Pacific Connector should also be required to post a bond to cover any damages from the pipeline that could occur such as an explosion.

F. The DEIS fails to adequately address risks associated with the Pipeline

The DEIS notes that the pipeline will cross areas of high liquefaction and/or lateral spreading as well as rapidly moving landslides. In these areas, the applicant proposes to monitor conditions and possibly implement additional mitigation measures at these locations. DEIS at 5-4. According to FEMA, "Large, permanent ground movements in the form of surface faulting, soil liquefaction, and landslides, are the most troublesome sources of damage to gas and liquid fuel pipelines (O'Rourke, 1987)." See FEMA, Earthquake Resistant Construction of Gas and Liquid Fuel Pipeline Systems Serving, or Regulated by, the Federal Government, at 1 (FEMA-233, July 1992).

Therefore, a primary concern for buried pipelines is their ability to accommodate abrupt ground distortions or differential displacements. (ASCE, 1984). The amount and type of ground displacement across a fault or fault zone is one of the most important factors to be considered in seismic design of pipelines crossing active faults (ASCE, 1983). Since ground displacements are in most cases difficult to predict, it is also difficult to develop designs which will protect pipelines against their effects. The most common forms of ground displacements are faulting, lateral spreading caused by liquefaction, and slope failures (landslides).

Id. at 11-12. In addition to these severe direct effects on pipelines, secondary effects from earthquakes can also damage pipelines. For example, flooding, hazards from fallen power lines, and explosion hazards when gas lines are ruptured can all result as secondary effects of an earthquake. Id. at 12. The

Henderson DEIS Comments-5

IND348-7 As discussed in the Landslide Hazards section (beginning on page 4-266) of the DEIS, high and moderate hazard landslides have been avoided except for two moderate hazard landslide areas. Mitigation measures for these moderate hazard landslide areas are included in the EIS. Liquefaction and lateral spreading hazard areas have been identified in table 4.2.2.2.2-2 and the Liquefaction Hazards section (beginning on page 4-262) of the DEIS. As discussed, many of these hazard areas would be avoided by placing the pipeline under these liquefaction hazard zone. Other identified areas would be further evaluated during Project design. Mitigation options for these areas may include deeper burial below the liquefiable soils, thicker pipe and/or weighting the pipe with a concrete coating, if necessary.

IND348-7

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IND348 Continued, page 6 of 11

proposed monitoring outlined in the DEIS does not adequately address these risks or explain how the pipeline itself, including choice of pipe material, type of joints, arrangement of the network, length of segments, location and details of fittings and accessories are made. In addition, there is no evidence that where the pipeline is proposed in the vicinity of active landslides and liquefaction zones that any proposed measures can adequately protect against pipeline damage and disturbance to protect the environment and communities of Southern Oregon. The DEIS acknowledges as much, stating that "it is not possible to completely mitigate the risk of pipeline damage in Coos Bay resulting from lateral spreading during a megathrust seismic event." DEIS at 4-265.

IND348-7
Confid

The DEIS recognizes "that the consequences of a pipeline failure may be catastrophic and involve fire and/or explosion." DEIS at 4-269. Nevertheless, the DEIS fails to take a hard look at alternatives that would avoid locating the pipeline in areas of seismic activity that pose a risk to the safety of the pipeline and the communities around it.

G. The DEIS fails to adequately analyze the Pipeline impacts

The DEIS fails to explain why private land aquatic conservation standards are less protective than public land standards. The DEIS states that aquatic conservation standards on public lands (NFS and BLM) are much more protective than private land standards, but does not explain why this is the case. See DEIS 4-610 ("A riparian strip at least 25 feet wide on private lands and 100 feet wide on federally managed lands, as measured from the edge of the waterbody, would be permanently revegetated.")

The federal standards for Riparian Reserves from the Aquatic Conservation Strategy are the best available science for protecting riparian areas and there is no reason why these minimum standards should not be applied to private land.

The DEIS also fails to adequately analyze impacts to streams and riparian areas from the Pipeline. The DEIS does not address scientific controversy and uncertainty about the effectiveness of erosion control measures. The DEIS also fails to provide an adequate explanation for the conclusory statement that sediment impacts will be short-term and minor. DEIS 4-74. The DEIS improperly masks the true impact of the project by analyzing impacts at too large a scale since the conclusions about impacts to fish and riparian areas is based on an analysis of 5th field watershed impacts only. To accurately assess impacts, the analysis should occur at a much smaller geographic scale than the 5th field watershed. For these reasons the FERC has failed to take a hard look at the impacts from the pipeline on the environment.

IND348-8

4. LNG Terminal Comments

A. The DEIS does not adequately address the risks and hazards associated with the construction of an LNG Terminal.

The Cascadia Subduction Zone (CSZ) is located off the Oregon coast and extends from Northern California to Vancouver, B.C, where the oceanic Juan de Fuca and Gorda

IND348-9

Henderson DEIS Comments-6

- IND348-8 Page 4-74 of the DEIS is in the land use section that includes a summary of effects for other resources such as water and aquatic resources. Detailed discussion of impacts are included in section 4.4.2 for streams and riparian vegetation by type of construction activity and stream crossing type. Table N-3 in appendix N identifies the acres of impacts for each stream crossing. Section 4.6.2 discusses impacts to fish. Mitigation measures are discussed in sections 4.4 and 4.6 for effects to streams and fish, respectively.
- IND348-9 See the response to IND1-4 and IND73-16.

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Plates meet the North American Plate. The zone widens from 60 km off southern Oregon to 150 km off the northern Olympic Peninsula in Washington. According to US Geological Survey's 2009 Earthquake Probability Mapping there is a 10% chance of a greater than 5.0 magnitude earthquake in the CSZ in the next 30 years. This probability increases as the years go on with a 20-25% chance in the next 50 years and a 30-40% chance in 100 years. A recent study based on 13 years of research finds that the Coos Bay area is more vulnerable than northern stretches of the CSZ, and concludes that there is a 40 percent chance of a major earthquake in the Coos Bay region during the next 50 years.¹ The study author, Chris Goldfinger, a professor at Oregon State University, states that "major earthquakes tend to strike more frequently along the southern end – every 240 years or so – and it has been longer than that since it last happened."² Forecasts predict that the CSZ is due for an earthquake similar in strength to the 9.0 magnitude earthquake felt off the coast of Japan in March 2011. A high magnitude earthquake in this zone would create several different conditions that may severely impact the stability of the terminal and pipeline.

IND348-10
Core

The Jordan Cove LNG Terminal will be constructed on dredged spoils. This poses a threat from earthquake liquefaction hazards which occur when water-saturated sediment is exposed to strong seismic shaking. The shaking causes the grains to lose grain-to-grain contact and the sediment acts as a fluid. Liquefaction is more likely in loose sandy soil with a shallow water table. Liquefied sediment layers may vibrate with displacements large enough to rupture pipelines, move bridge abutments, or rupture building foundations.

The Coos Bay area has a population of about 31,750 according to the 2010 Census. There are residential areas, businesses, and an airport all located within half a mile of the Jordan Cove site. A hazardous event at the site could seriously impact the safety and infrastructure of the surrounding area. The Jordan Cove site will include two large LNG storage tanks, the liquefaction terminal, pipeline connections, marine facilities, and a natural gas fueled power plant. Disruption of the site from earthquake or tsunami could compromise the integrity of any of these components and possibly lead to leaking of gas or LNG, disruption in power service to the local grid, gas explosion or other catastrophic event.

IND348-11

A recent study of large historic landslides along the Oregon coast indicates that they were most likely caused by a high magnitude earthquake occurring in the CSZ. A future earthquake could result in further movement of existing rockslides as well as formation

IND348-11

¹ Goldfinger, et al., *Turbidite Event History – Methods and Implications for Holocene Paleoseismicity of the Cascadia Subduction Zone*, in EARTHQUAKE HAZARDS OF THE PACIFIC NORTHWEST COASTAL AND MARINE REGIONS, USGS PROFESSIONAL PAPER 1661 (Robert Kayen, ed.) July 17, 2012.

² Oregon State University Press Release, *13-Year Cascadia Study Complete – And Earthquake Risk Looks Large* (Aug. 1, 2012). Available at <http://oregonstate.edu/ua/news/archives/2012/jul/13-year-cascadia-study-complete-%E2%80%93-and-earthquake-risk-looks-large>

Henderson DEIS Comments-7

IND348-10 See the response to IND1-4 and IND73-16.

IND348-11 Comment noted. It is acknowledged that such seismic hazards exist in the EIS (see section Seismically Induced Landslides and Rockfalls, page 4-266 of the DEIS). Rockslide and landslide areas have been evaluated along the pipeline route. Areas of high hazard have been avoided and areas of moderate hazard have been avoided wherever possible.

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of new rockslides along the coast. Landslides along the pipeline route could result in breakage or movement of the pipeline.

Despite these risk factors, the DEIS concludes that, "the site is not unsuitable due to tsunami hazards." DEIS at 5-4. The DEIS recommends that further geotechnical studies (which have not yet been performed) and detailed designs of ground improvements be submitted to FERC for review and approval prior to construction. It is unclear why FERC believes that the initial information presented by the applicant is sufficient to make the determination that the site is suitable for this project, given the proximity of the Coos Bay communities and infrastructure as well as the risks and probabilities of a major megathrust earthquake at this location.

While existing mapping and planning programs will provide communities with a better sense of what to expect in the event of an earthquake or tsunami, the 2011 Japanese tsunami is a prime example of the fact that even where planning programs and mitigation measures are in place for such a disaster, there are significant challenges to predicting the full extent of damage that may be caused by natural hazards. The DEIS does not adequately address the level of destruction possible at this location.

B. The DEIS does not adequately address spills

If LNG spills, it vaporizes. Because these vapors are heavier than air, they form a cloud close to the ground that will eventually dissipate. However, if an ignition source is present before the vapor cloud dissipates to less than 5% to 15% concentration, the vapor cloud can ignite and burn. The concerns expressed by many commenters about the risks of the pipeline extend beyond the possibility of catastrophic seismic events, to question the modeling and methods employed to understand the risks posed by vapor at the site. For example, on February 4, 2015, Senator Ron Wyden requested that FERC and PHMSA provide information to the public regarding the hazard modeling used to measure vapor cloud dispersion. This modeling is relevant to general spills but also to the possibility of a rupture or other spill resulting from tsunami or earthquake.

According to comments and analysis provided by professors of chemical and mechanical engineering Jerry Havens and James Venart, "the hazards attending the proposed operations at the Jordan Cove export facility could have the potential to rise, as a result of cascading events, to catastrophic levels that could cause the near total loss of the facility, including any LNG ship berthed there. Such an event could present serious hazards to the public well beyond the facility boundaries." See Havens & Venart Comment, Jan 14, 2015.

C. The DEIS did adequately analyze the impacts of the project because the wildlife agencies have not prepared a Biological Opinion yet

No Biological Opinion has been prepared for the project and as a result the wildlife agencies have not yet had an opportunity to provide comments or assessments of the

Henderson DEIS Comments-8

IND348-11
Cont'd

IND348-12

IND348-13

IND348 Continued, page 8 of 11

IND348-12 See the response to IND1-4 and IND73-16.

IND348-13 The ESA (not NEPA) regulates and governs Biological Assessment (BA) and Biological Opinions (BO). A BA has been prepared for this project and provided to the FWS and NOAA. As part of formal consultation, the FWS and NOAA will prepare a BO. Furthermore, the FWS is a cooperating agency for the EIS, and have provided comments and edits to the document.

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impacts of the current project proposal on listed species and critical habitat or how to avoid adverse impacts to listed species.

FWS and/or NMFS is required to issue a Biological Opinion for this project which will address whether this project would likely jeopardize the continued existence of a listed species, or would result in the destruction or adverse modification of designated critical habitat. When the FERC finds that the project is likely to adversely affect numerous species (as it did here DEIS 4-628), a Biological Opinion is required to assess impacts to these species. By preparing a DEIS and analyzing impacts to species without a Biological Opinion or input from FWS and/or NMFS, the DEIS fails to take a "hard look" at the project's impacts to endangered species and critical habitat.

IND348-13
Cont'd

The DEIS also fails to adequately consider the cumulative impacts of the project by stating, without any support, that the "life-cycle" cumulative environmental impacts from exploration, production, and gathering of natural gas; transportation to Pacific Connector; and shipment of LNG overseas from the terminal" are outside the scope of the EIS in contravention of the CEQ regulations requiring the FERC to consider all direct, indirect and cumulative impacts.

IND348-14

IND348-14 See the response to IND1 and IND1-3.

Dated this 13th day of February 2015.

Respectfully submitted by:

/s/ R. Scott Jerger
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CERTIFICATE OF FILING AND SERVICE

I certify that on the 13th day of February 2015, I electronically filed the original document, Henderson's DEIS Comments, with:

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Henderson DEIS Comments-9

I further certify that on the 13th day of February 2015, I served one copy of Henderson's DEIS Comments upon both applicants in these proceedings, Jordan Cove Energy Project, L.P. and Pacific Connector Gas Pipeline, L.P. by electronic mail and for those parties listed below without electronic mail, by U.S. mail, first class postage prepaid.

Jordan Cove Energy Project L.P.:

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125 Central Avenue, Suite 380
Coos Bay, Oregon 97420

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Beth L. Webb
Dickstein Shapiro LLP
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Southwest Gas Corporation
5241 Spring Mountain Road

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Las Vegas, NV 89150
pamela.ruckel@swgas.com

DATED this 13th day of February 2015.

R. Scott Jerger
R. Scott Jerger, OSB#023377
Attorney for Henderson

Henderson DEIS Comments-11

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IND349

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-1

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-2

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-3

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-4

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-5

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,

Forrest English
PO Box 102
Ashland, OR 97520

19273901723

IND349-6

IND349 Forrest English, Ashland, OR

IND349-1 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-2 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-3 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in Section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-4 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-5 Comment noted.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

When I think about the Jordan Cove project, I zoom out, like we can now do with Google Earth.

I see the length of the pipeline, and the Earth upon which it would lie. I see the forest and rivers and hills and valleys that would be affected. I see a pipe full of pressurized gas, a BIG pipe. And I think there are many things that impact this rigid pipe: weather, ground shifts, avalanches, floods, tsunamis, frost, temperature extremes, fire, EARTHQUAKE, and human activities, not all without malicious intent.

What are the chances that nothing is ever is going to impact that pipe to put it at risk of cracking, separation or rupture through the life of the pipeline? Zero. Something will happen. How long would it take monitors to identify there is a problem? How long would it take for repair crews to arrive? What risks are we Oregonians willing to accept to permit a NON-US company transport a gas across our beautiful countryside, FOR NO BENEFIT TO US?

IND349-7

What is wrong with this picture?

As an Oregonian, the risks far outway the benefits, which are none.

Please, deny certification to the Canadian company Veresen.

Sincerely,

Cynthia Harper
218 Theo Drive
Talent, OR 97540

IND349 Cynthia Harper, Talent, OR

IND349-7 See section 4.13.9.2 of the DEIS for a discussion of pipeline accidents.

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Paul Friedman
FERC

FERC's Draft Environmental Impact Statement fails to demonstrate that there is a need or public benefit from the Jordan Cove project. | IND349-8

This project will largely benefit a foreign gas company.

Please deny this certificate.

Sincerely,

Jane Beattie
200 6th St E
Ketchum, ID 83340

IND349 Jane Beattie, Ketchum, ID

IND349-8 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

The spread of the invasive species, Japanese knotweed along the pipeline routs will cause serious economic damage to all farmers along the pipeline route as well as clogging fish runs where lines run near rivers and streams. Please check the battle that Clear Water Services in Oregon has had with this plague. We personally have battled this invasion on our organic orchard. It only take a tiny snippet to start a whole new colony that will choke out all surrounding foliage. This plant resists herbicides, heat and being dug out as its roots go underground 7 feet to pop up in another location. It puts out a chemical that chokes out native species of plants.

IND349-9

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-10

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-11

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-12

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-13

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-14

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a

IND349 Ellen Saunders, Manning, OR

IND349-9 Potential impacts as well as measures that would be implemented to minimize the risk of the establishment or spread of invasive plant species is addressed in Section 4.5.

IND349-10 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-11 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-12 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in Section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-13 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-14 Comment noted.

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IND349 Ellen Saunders, page 2 of 2

foreign gas company. Please deny this certificate.

Sincerely,

Ellen Saunders
47950 NW Dingheiser Rd
Manning, OR 97125

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

Deny this project.

The harms are unacceptable, impossible to mitigate. Public need or benefit has not been proven adequately. Public need requires this project be halted.

The primary beneficiary is a Canadian company. The primary purpose of the project is export. A trickle of gas and jobs for Southern Oregon does not constitute need or benefit. The money to Coos Bay government is a pay off for becoming an unnecessary industrial sacrifice zone.

IND349-15

The harm to impacted ecosystems is unacceptable. We are living amidst the sixth greatest extinction but our policies remain in a past that believes species should just move over for "commerce."

"...[A] staggering 41% of all amphibians on the planet now face extinction while 26% of mammal species and 13% of birds are similarly threatened."
<http://www.theguardian.com/environment/2014/dec/14/earth-faces-sixth-great-extinction-with-41-of-amphibians-set-to-go-the-way-of-the-dodo>

According to the DEIS already stressed rivers and streams and water bodies would be further stressed in almost 400 different places in Southern Oregon. Millions are already being paid out to mitigate higher water temperatures in important habitat for endangered and stressed fish and other species. It makes no sense to clearcut important riparian zone habitat for the sake of an export pipeline requiring further millions and time. The clear cuts reverse what takes YEARS and millions to repair via awards from lawsuits, etc. It's death by a 1000 cuts you propose as acceptable. At what point does habitat fragmentation result in collapse? We are living that consequence now, amidst the sixth greatest extinction, but don't properly consider this in our individual choices re: commerce. All of us are guilty of this.

IND349-16

I work with Friends of Wagner Creek in Talent, Oregon and together we are planning to restore the local Wagner Creek tributary of Bear Creek. From this work I have learned a creek must stay below 64 degrees temperature for fish to survive, and consequently, the entire ecosystem. If temperatures are too warm the water running through the creek does not support life as it has evolved. The creatures die and the creek and river becomes something different. It takes years and lots of grants and awards to restore native species to cool the river and remove invasive blackberries and other species to ensure survival of the ecosystem. Your report says water temperatures would not be significantly impacted but logic says we can't afford the stress on our rivers and streams.

IND349-17

The DEIS is based on an antiquated understanding and regard of the importance of maintaining a healthy environment.

IND349-18

You must see outside the purpose of your particular organization. Supporting gas

IND349 Johanna Harman, Talent, OR

IND349-15 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-16 Streamwater exposure to the lack of shade at pipeline crossings would be temporary and limited. Modeling results indicate that within a short distance downstream from all crossings, instream water temperatures would return to ambient conditions.

IND349-17 Streamwater exposure to the lack of shade at pipeline crossings would be temporary and limited. Modeling results indicate that within a short distance downstream from all crossings, instream water temperatures would return to ambient conditions. Pacific Connector's ECRP includes measures to restore cleared areas and control noxious weeds.

IND349-18 Comment noted.

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commerce might be the purpose of your organization but it's not the most important value we collectively hold. Our collective survival is more important than the temporary profits of a foreign gas company. At a certain point no money can repair the damage we are doing to the environment. At a certain point no money can repair the damage we are doing to our atmosphere.

"Severe...pervasive... irreversible: IPCC'S Devastating Climate Change Conclusions"
<http://www.commondreams.org/news/2014/08/27/severe-pervasive-irreversible-ipccs-devastating-climate-change-conclusions>
The gamble isn't worth the risk.

IND349-18
Cont'd

The harm re: climate change is unacceptable.

First of all, natural gas/methane is not a bridge fuel, it's a greenhouse gas, and it's more destructive than previously thought. Your analysis isn't considering this, and must. "The latest IPCC report determined "methane is 34 times stronger a heat-trapping gas than CO2 over a 100-year time scale, so its global-warming potential (GWP) is 34. That is a nearly 40% increase from the IPCC's previous estimate of 25...the EPA has been using a GWP of 21 for its estimate of how methane compares to carbon dioxide — a figure that is nearly twenty years out of date."
<http://thinkprogress.org/climate/2013/10/02/2708911/fracking-ipcc-methane/>

IND349-19

Extreme extraction fracking has backing from the Obama administration and many Oregon representatives because they believe, "If extracted safely, it's the bridge fuel that can power our economy with less of the carbon pollution that causes climate change," according to President Obama at the State of the Union address.

But the best available peer-reviewed science says this isn't true. Methane may be more damaging than coal.
<http://grist.org/climate-energy/bad-news-for-obama-fracking-may-be-worse-than-burning-coal/>

The leaking is worse than we thought.

"The paper, the first to directly measure methane plumes above natural gas drilling sites in Pennsylvania's Marcellus shale, recorded methane leaks far more powerful than EPA estimates [1000 times EPA estimates]."
<http://www.desmogblog.com/2014/04/16/study-find-marcellus-drilling-methane-leaks-1-000-times-epa-estimates-casting-doubt-bridge-fuel-notion>

"One small "hot spot" in the US Southwest is responsible for producing the largest concentration of the greenhouse gas methane seen over the United States — more than triple the standard ground-based estimate -- according to a new study of satellite data by scientists at NASA and the University of Michigan." ...The hot spot, near the Four Corners intersection of Arizona, Colorado, New Mexico and Utah, covers only about 2,500 square miles (6,500 square kilometers), or half the size of Connecticut.

...Satellite data cannot be as accurate as ground-based estimates, but from space, there are no hiding places," Frankenberg said."
http://science.nasa.gov/science-news/science-at-nasa/2014/09oct_methanehotspot/

The leaking cannot be fixed. It's a fallacy to make this promise. And there's too much risk

IND349-20

IND349 Johanna Harman, page 2 of 3

IND349-19 Discussion of GWP has been added. Tabulated calculations are based on the current EPA GWP of 25 for methane.

IND349-20 Comment noted.

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in this gamble.

The Intergovernmental Panel on Climate Change (IPCC, 11-1-14 report) determined that by 2050 we must have reduced our reliance on fossil fuels by over 80%. The Jordan Cove terminal will have decades of life left by 2050.

You have not considered if this massive fossil fuel project would fit into that reduction. This project could tip us over into unlivable climate change.

IND349-21

The best available science is cautioning us re: methane and climate change. NEPA demands you consider cumulative impacts. The courts are beginning to agree.

Delaware Riverkeeper v. FERC, 2014 ruled that a continuous pipeline project cannot be segmented into multiple parts to avoid a comprehensive National Environmental Policy Act (NEPA) review. Similarly, you must look at the cumulative impact of the totality of the natural gas projects you are green lighting because the best available science is warning of catastrophe that cannot be mitigated.

You have not adequately considered the cumulative impacts of this project and this is not acceptable.

IND349-22

You haven't even included in your analysis the impacts of increased fracking throughout gas basins in the Rockies.

IND349-23

Due to long term and in many cases permanent impacts on our climate and environment this project is clearly not in the public interest. Please deny this certificate.

Sincerely,

Johanna Harman
411 Talent Ave, #1
Talent, OR 97540

IND349 Johanna Harman, page 3 of 3

IND349-21 See the response to IND1.

IND349-22 This EIS does not segment the various portions of the pipeline, or the pipeline from the terminal. The entire project, including proposed plan amendments, is being considered in one document. In regard to the comment requesting that the EIS consider all natural gas projects, this would be beyond the scope of this analysis.

IND349-23 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-24

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-25

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-26

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-27

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-28

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,
-Susan Anderson
PS-

I'm very troubled about the potential for earthquake-related damage causing oil spills. The coast is overdue for extreme seismic activity and fracked oil is more toxic than other types. I believe the potential costs of an earthquake-related disaster far outweighs the very limited benefits this pipeline brings for Oregonians.

IND349-29

Susan Anderson
45 W. 37th Ave
Eugene, OR 97405

IND349 Susan Anderson, Eugene, OR

IND349-24 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-25 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-26 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-27 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-28 Comment noted.

IND349-29 The DEIS discloses the likely Tsunami hazards, earthquake, liquefaction and subsidence issues in section 4.2.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

Please DENY the certification of the Jordan Cove LNG project.

I live in Southern Oregon and I am very concerned about the serious environmental impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement that fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-30

Natural gas is methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be obtained by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by federal agencies.

IND349-31

Due to long term, and in many cases permanent impacts on our climate, economy, forests and streams, this project is clearly not in the public interest and would primarily benefit a FOREIGN GAS COMPANY. Please DENY this certificate.

Sincerely,

Richard Mikula
Jacksonville, Oregon

Richard Mikula
retired chemistry teacher
164 Palmer Creek RD
Jacksonville, OR 97530

541-973-0164

IND349 Richard Mikula, Jacksonville, OR

IND349-30 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-31 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-32

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-33

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-34

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-35

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-36

It is not right that public lands and waters should be impacted for private gain. This project would do our citizens no good. In a democracy, private gain at public expense does not stand.

IND349-37

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,
Edith Koenig
P.O. Box 446
Burns, OR 97720

IND349 Edith Koenig, Burns, OR

IND349-32 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-33 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-34 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-35 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-36 Comment noted.

IND349-37 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

As a former resident of Oregon who holds great affection for my native home state, I urge you to reject the "Jordan Cove/Pacific Connector" liquid natural gas terminal and pipeline. This pipeline and LNG export project is contrary to the public interest, and responsive to no demonstrated need in either Oregon or America in its entirety, and absolutely none equal to the ecological and social damage it would inflict.

IND349-38

Any rational cost-benefit consideration must find that the tax revenues and relatively small infrastructure employment would fail to offset the loss of our state's precious lands and waters. The integrity of Oregon's countryside matrix of farmlands, forest, and streams is priceless and would be shattered over a distance of hundreds of miles by the pipeline that is inextricably linked to the desired LNG port. It is extremely perverse and inappropriate for Oregon to consider permitting such an ecologically malicious facility, whose purpose is to export gas to Asia. Such an LNG port and pipeline would also be contrary to the federal government's declared goal of reducing global warming, and make FERC complicit in further sinking the world into unsustainable dependence on carbon-based fossil fuels. Presuming that the Boardman coal plant is retired by 2020, the Jordan Cove LNG project would be the single most powerful planetary heat-trapping piece of infrastructure in Oregon, simultaneously negating the state government's parallel and explicit policy goal to curtail global warming.

IND349-39

IND349-40

If erroneously allowed to proceed, the "Jordan Cove/Pacific Connector" LNG terminal and associated pipeline would destroy vast areas of estuary, forest, and farmland that now stand in its proposed route, from Coos Bay to California. Oregon's state government must defend these resources in which the state has either ownership or other vested public interest, including land, water, vegetation, and wildlife, against proposals such as "Jordan Cove/Pacific Connector" to destroy them. Veresen proposes to dump 5.7 million cubic yards of fill into 400 waterways throughout southwest Oregon, negating the hard-fought progress of Oregon's agencies and citizens toward salmon and river restoration. The pipeline would significantly increase temperature and sedimentation on many streams, and cause watershed-level degradation of the Coos, Umpqua and Rogue rivers, all indirect and connected impacts that cannot be severed from the LNG port itself. Many of these impacts would likely further degrade streams that are already listed as impaired under the Clean Water Act.

IND349-41

In addition, the terminal would absolutely devastate Coos Bay itself, through initial construction as well as ongoing dredging. This assault on Oregon's coast would be painfully ironic, in light of the state's recent emphasis on safeguarding our coast through marine reserves and other policies. As one who has lived on the Central Oregon coast, I can personally attest to the blue and green Eden that is our coastline, and the thought of an LNG terminal planted in Coos Bay, with its fabric of tidal gardens torn asunder and replaced by concrete and iron, is horrific to contemplate. Coastal ecosystems whose biological and oceanographic rhythms have not been shattered by myopic human engineering are achingly scarce, and Coos Bay is a jewel that must not be traded into

IND349-42

IND349 Jim Steitz, Ashland, OR

IND349-38 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-39 Comment noted.

IND349-40 See the response to IND1.

IND349-41 All stream crossings would be completed under the terms of a COE CWA Section 404 permit, the NPDES Construction Stormwater Permit (CWA Section 402), and CWA Section 401 water quality certification requirements. The goal of BMPs is to minimize effects so that they are minor or construction is halted until effects are reduced back to minor. As a follow-up measure to help ensure crossing actions would not adversely affect stream bank and channel structure, Pacific Connector would monitor all stream crossings, regardless of risk, quarterly for 2 years after construction. Any adverse issues found during the monitoring with channel stability or habitat would be remediated. Additional monitoring would occur periodically over a 10-year period with implementation of remediation as needed.

IND349-42 All in-water work would be completed under the terms of a COE CWA Section 404 permit, the NPDES Construction Stormwater Permit (CWA Section 402), and CWA Section 401 water quality certification requirements. Impacts on Coos Bay and habitat will be mitigated as discussed in sections 4.4.2 and 4.6.2.

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oblivion, as have so many other previously verdant river-ocean junctions.

Decisions on environmental impact analyses necessarily entail a cost/benefit comparison, and Oregon's own 2008 DOE report found that the country as a whole already has enough present and approved future supplies to meet projected demand, rendering the "Jordan Cove/Pacific Connector" LNG terminal and pipeline of no benefit except for the revenues from the sale of the gas, of which only a fraction would remain with Oregon employees, residents, or governments rather than Veresen. These financial rewards are petty and inconsequential compared to the devastation of Coos Bay and the landscapes of Southwest Oregon, for which our descendants will never forgive us. The Klamath, Rogue, Umpqua, Coquille and Coos River watersheds are all priceless bastions of natural life. No agency with a pretense of acting in the public interest may permit a violent laceration of a pipeline corridor, many feet in diameter and 230 miles in length, through these lands and waters.

IND349-43

The Federal Energy Regulatory Commission must uphold its public-interest obligation to Americans, not its parochial and traditional constituency of energy companies with no personal or financial interests beyond themselves. FERC must intervene in to defend public and ecological values, and reject the "Jordan Cove/Pacific Connector" LNG terminal and pipeline. I hope that you will do everything in your power to prevent such an unwarranted desecration. Thank you for your attention to this urgent issue.

Sincerely,

Jim Steitz
357 Vista Street Apt. 5
357 Vista Street Apt. 5
Ashland, OR 97520

(435)770-4797

IND349 Jim Steitz, page 2 of 2

IND349-43 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America. The public will be better served by the preservation of the wilderness which will be destroyed by this project. We do not need more of this type of "development"; we need more of nature, which supports and sustains us. It behooves us to take major steps to promote energy from sustainable and renewal resources, and to practice conservation of energy above all. We do not need to support more nineteenth century technology,

IND349-44

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-45

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-46

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-47

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-48

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,

Joy Schochet
828 W. George
Chicago, IL 60657

IND349 Joy Schochet, Chicago, IL

IND349-44 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-45 Comment noted.

IND349-46 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-47 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in Section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-48 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-49 Comment noted.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-50

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,

Genevieve Windsor
P. O. Box 1515
Talent, OR 97540

IND349 Genevieve Windsor, Talent, OR

IND349-50 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am strongly opposed to the proposed Jordan Cove LNG pipeline and export terminal. I do not feel the Draft Environmental Impact Statement is sufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-51

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where the drilling process leaks huge amounts of methane, which needs to be included in FERC's analysis.

IND349-52

This project largely benefits a foreign gas company. Please deny this certificate.

Sincerely,

Margery Zettler
10 E South Stage Rd Spc 421
Medford, OR 97501

IND349 Margery Zettler, Medford, OR

IND349-51 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-52 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

The tar-sand extraction activities in Alberta are taking place on a scale incomprehensible to the human imagination, the machinery is some of the biggest that exists in the world, trucks towering over one and a half stories tall, operating twenty four hours a day. These activities are slated to turn over 60,000 square miles of pristine boreal forest into an industrial sacrifice zone, this equates to a region the size of the state of Florida, we cannot afford this sacrifice. For each barrel of oil that tar sand extraction produces, it also produces two barrels of toxic waste. Everyday, Syncrude dumps 250,000 tons of toxic waste into the Syncrude Tailings dam, which is currently the world's largest dam. This dam is 13 miles long and holds 706 million cubic yards of toxic water. The tar sand extraction industry is currently using 400 million gallons of water a day, 90% of which ends up as toxic waste which is put into ponds that are up to 100 square miles in size, making them some of the largest manmade structures on earth. Look a photo of these lands, they are quite literally hell on earth, a once thriving habitat is reduced to a toxic waste land, everything is dead. And who is responsible for mitigating environmental impact? A 44 member group named CEMA, many of whom are appointed by the multi-national corporations most invested in this project. If this group doesn't want something studied then it is not studied. The director of this group reports that they are not even looking at groundwater runoff or impact, they are completely ignoring the millions of gallons, the thousands of square miles of toxic waste water. Can we trust these corporations to safeguard our water? The tar sand operations are the fastest growing source of heat trapping greenhouse gas in Canada. By 2020 oil sands will release twice the amount of greenhouse gas produced currently by all the cars and trucks in Canada. Fully exploited these tar sands would release more climate polluting gasses than both the US and China combined have release in ALL their history. And this is what is at stake as our president announces that "No challenge poses a greater threat to future generations than climate change." and that 14 of the 15 globally hottest years on record have occurred since 2000. All this is at stake when our pentagon has stated that climate change is a threat to national security and Chuck Hagel, our defense secretary has stated, " Rising global temperatures, changing precipitation patterns, climbing sea levels, and more extreme weather will intensify the challenges of global instability, hunger, poverty, and conflict. They will likely lead to food and water shortages, pandemic disease, disputes over refugees and resources, and destruction by natural disasters in regions across the globe." All this is at stake when the UN reports that globally 82% of today's oil reserves need to be left in the ground to stop us from raising global temperatures another 2 degrees Celsius and destabilizing the climate, which includes 90% of US coal and virtually all Canadian tar sands. Are these really the types of activities you want to be supporting? How is it that any sane individual could reason, that any amount of money, scientific study, or quantitative data could possibly justify supporting such blatant acts of environmental and global terrorism? Blinded by money, politicians are acting in the best interests of the greatest terrorist groups that have ever existed on this planet. Are you aware that our future and all its generations depend on our ability to reverse the ecological damage that has taken place on this planet over the past few centuries? We need to act now, we need to be planting trees, not dropping bombs and building pipelines, it's that simple. The CEO's and

IND349-53

IND349-54

IND349 John Hutton, Ashland, OR

IND349-53 Mitigation measures for impacts to waters of the U.S. are required by the COE (as part of the Clean Water Act). Other federal and state agencies have also required additional mitigation measures that would be required and implemented if the project is authorized.

IND349-54 This is a natural gas project not an oil or coal project.

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executive board of directors of the corporations involved in these projects should be put on trial, not given financial support and right of passage on our land. This debate shouldn't even be taking place. Please stop this project before it's too late. You, all your friends, your family, your children, and all life depends on stopping this project and focusing on clean energy alternatives and means of restoring healthy functioning ecological systems.

And How safe is this project? The systems associated with these types of projects are not just prone for failure, they are bound for failure, and when they fail the consequences are catastrophic. Keep in mind that this pipeline is proposed to cross over 400 rivers and streams, many of which are located in wild and scenic recreational areas, many of which are already listed as degraded waterways in need of restoration. It will cross the nations largest aquifer. Consider the 2010 tar-sand disaster in W. Michigan, a comparable project, albeit much smaller in scale. This has resulted in the most expensive on shore oil spill in US history. 4 years and one billion dollars later this disaster still plagues our waterways today. Between 1994 and 2013 the US had 855 "serious incidents" with gas distribution and transmission systems resulting in 319 fatalities and 1154 injuries and over 558 million dollars in property damage and immeasurable environmental damage. Furthermore that Wall Street Journal found that between 2010 and 2013 there were 1,400 pipeline spills and accidents in the US. 4 out of 5 of which were discovered by residents, not oil companies. And how many inspectors are proposed to be monitoring the 1,179 miles of pipeline? 5. It takes just one accident, one earthquake, one tsunami, one poorly aimed gunshot, one faulty weld for our water to be contaminated and us left unable to clean it. Ever heard of Murphy's law? How can anyone claim this system to be safe?

And who are we relying on for the environmental impact statements, analysis, and modeling posed by this project? Who are we relying upon to tell us how safe this project is? Why the corporations and proponents of this project themselves. How is it that we feel we can trust that this data is truthful and unbiased when the very people who generate it are the very people who most want to see this project through. And what have they told us: No significant environmental impact due to this project. This is clearly a lie. Furthermore The Department of Environmental Quality lacks the resources to verify the truth behind these claims.

And where does the public interest lie in this equation? It's no where to be found. Can't it create thousands of jobs? Well not exactly. First off this argument, so often used by politicians, is completely flawed and meaningless, jobs can be created through infinite means, and as importantly, if not more so, we should be focusing on the types of jobs being created. Creating jobs that support the health of this planet and all the beings that reside upon it. We should be focusing on creating jobs via the development of healthy landscapes and resilient infrastructure, the restoration of degraded habitat, producing safe, renewable energy, clean water, fertile soils, pure air, growing non-toxic non-GMO foods, supporting healthy biological systems and family owned farms, not by supporting massive chemical corporations and oil companies spraying unprecedented amounts of extremely toxic substances everywhere. And the means to do this already exist, they're already happening, despite the governments greatest efforts to inhibit its progress. Need I remind you that we are currently experiencing a drought in California and Oregon that has never before been witnessed, how are we to make it through this when our congress resides in the pocketbooks of the multi-nationals whom are polluting our water reserves at an

IND349 John Hutton, page 2 of 3

IND349-55 The Pipeline and Hazardous Materials Safety Administration (PHMSA) within the DOT is a cooperating agency for the development of the EIS and has jurisdiction by law or special expertise with respect to environmental impacts involved with the proposal. As part of the NPA review, FERC must assess whether the proposed facilities would be able to operate safely and securely, and do a technical review of the engineering design with layers of protection or safeguards to reduce the risk of a potentially hazardous scenario from developing. Section 4.13 discusses the reliability and safety for the project. As stated in section 4.13, the LNG terminal would meet the federal safety regulations regarding the thermal radiation and flammable vapor dispersion exclusion zones and appropriate design standards, and Pacific Connector's natural gas facilities would also be designed, constructed, and operation in accordance with DOT safety standards.

Discussion on avoiding impacts to wild and scenic river sections is included in sections 4.4, 4.8, and 4.9. Section 4.4.1 discusses plans to avoid, minimize, or mitigate potential effects to aquifers.

IND349-56 Section 4.1.9.2 of the DEIS presents pipeline accident data.

IND349-57 FERC reviews the data provided by the applicant, see the many data requests filed on the FERC web site requiring additional analysis and data. Independent analysis is preformed where FERC has concerns.

IND349-58 The impacts of this project on jobs and economic conditions is addressed in section 4.9.

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alarming rate?

But back to jobs. In the latest report by the state department, when looked at as "an average annual job" it would create only 1,950 jobs for a mere two years during construction, many of which would come from across boarders. The final number of permanent jobs created by this project: 35 permanent employees and 15 temporary contractors. So how is it that 35 jobs represents the entirety of public interest? Furthermore this gas is for export. There is literally no public benefit from this project, how does the creation of 35 jobs justify enough public interest to start seizing private property. This is criminal and completely unacceptable.

IND349-59

So if there is no public interest, and global catastrophe is at stake, then how is it possible that anyone could, in good conscience, support such a dangerous project? Is the aim to proliferate destruction and terror around the globe? Is that they type of thing you want to aid? Where is your moral judgement? Anyone supporting this project is unfit to be in any position of civil service.

May I remind you that clean water does not grow on money, fertile soils do not grow on money, breathable air does not grow on money. You cannot buy these things, only through natural, healthy, biological processes can these things be truly obtained. By the trees, and streams that our political system, run by corporations, seems so desperate to destroy. What shall we do when these things no longer exist in ample quantity to sustain our existence? What shall we tell our children when there is no more drinkable water, no more plantable soil, no more breathable air? Sorry our actions, fueled by corporate and political greed, led to your demise, we were too short sighted to understand the implications of what we were doing, If it's any consolation we're going to die a miserable death too.

IND349-60

but we're not there yet, it's not too late. We can still turn this ship around. You have to. This project will not happen because it can not happen. There are many of us doing good work, there are viable alternatives and solutions out there. But we need your support. Prove to us that you deserve the title of civil servant, not corporate minion. Do everything you can to stop this madness. In front of you lies a massive opportunity, an opportunity to help stop the greatest threat to life that currently exists. How you choose to act now will forever determine your legacy. Do you want this legacy to be that of laying waste to the land and paving the road to hell for nothing but the means of corporate greed? Or rather would you prefer it to be one of putting an end to this madness and offering hope and regeneration and salvation to the beings that reside upon this earth? Please, I implore you, we need you on our side, help us now, before it's too late.

John Hutton
4860 Highway 66
Ashland, OR 97520

IND349 John Hutton, page 3 of 3

IND349-59 This comment appears to be in reference to the Keystone XL pipeline project, which is not the subject of this EIS.

IND349-60 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

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Paul Friedman
FERC

I am totally against having the LNG pipeline snake through Oregon's hills, and ruin our shoreline.

There is no reason to effect Oregon's environment for a company from another country.

Accidents will happen. You need to factor that in.

Sandra Baker 6454 Coleman Creek. Rd. Medford OR 97501

Sandra Baker
6454 Coleman Ck. Rd.
Medford, OR 97501

541 535-9848

IND349 Sandra Baker, Medford, OR

IND349-61 Section 4.1.9.2 of the DEIS presents pipeline accident data.

IND349-61

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

FERC's Draft Environmental Impact Statement is incomplete because it fails to comply with Federal CFR's and Oregon State Law requiring to show a need or public benefit from this project in Oregon or anywhere else in America.

IND349-62

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. Direct impacts to public lands and waters from such a massive construction project would significantly harm all surrounding and adjacent ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them.

IND349-63

FERC fails to show the massive and direct impacts, and the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated in a wasteful project of this magnitude.

IND349-64

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-65

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-66

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-67

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,

Hal Anthony
Gardener
3995 Russell Road
Grants Pass, OR 97526

541-476-4156

IND349 Hal Anthony, Grants Pass, OR

IND349-62 Nowhere in the DEIS is there a statement that the Project would be in the "public interest" or "public benefit." In fact, the Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-63 Impacts to listed species are addressed in section 4.7 of the EIS. Impacts to general plants and wildlife are addressed in sections 4.5 and 4.6. Safety and reliability are addressed in section 4.14. Impacts to waterbodies and wetlands is addressed in section 4.4.

IND349-64 The EIS includes discussion of the construction and operation of the pipeline and terminal.

IND349-65 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-66 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-67 Comment noted.

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-68

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-69

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-70

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed. The real "need" is to continue exorbitant profits to those controlling the fossil fuel industry. The money proposed to be spent on the pipeline and terminal should be put into alternative energy development, but of course it won't, because the fossil fuel industry controls all our politics.

IND349-71

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-72

This proposed project is just plain short-sighted and primarily benefits a few wealthy power-brokers and does nothing but harm the rest of us. We need to break our dependence on fossil fuels before we have irreversibly condemned ourselves to extinction. The long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

IND349-73

IND349 Annette Parsons and Jim Clover, Grants Pass, OR

IND349-68 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-69 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-70 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in Section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-71 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-72 Comment noted.

IND349-73 Comment noted.

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IND349 Annette Parsons, page 2 of 2

Sincerely,
Annette Parsons and Jim Clover
Applegate Valley, Oregon

Annette Parsons
1831 Slagle Creek Rd
Grants Pass, OR 97527

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Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am concerned about FERC's Draft Environmental Impact Statement concerning the impacts of the proposed Jordan Cove LNG export terminal and the Pacific Connector gas pipeline. The impact statement fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America. Please deny the certificate!

IND349-74

We need to divert our efforts to clean energy both here and abroad rather than continue to pollute our land, water, and air. Climate change is real and the practice of "fracking" has dire consequences for the earth.

IND349-75

Pay attention to science. It's real. The current, best available science from Harvard, Stanford and NASA identifies that the methane leak calculations from fracking must be redone and reconsidered as part of this project. Impacts from leakage on the climate MUST be included in FERC's analysis.

IND349-76

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-77

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-78

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,

Cynthia Edwards, PhD

Cynthia Edwards
13238 E. Evans Creek Rd.
Rogue River, OR 97537

IND349 Cynthia Edwards, Rogue River, OR

IND349-74 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-75 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-76 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-77 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-78 Comment noted.

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):
Dear. Mr. Paolini,

I was appalled to learn that your Chief Investigative Reporter, Emily Miller, stood with the radical pro-gun group Virginia Citizens Defense League on Martin Luther King, Jr. Day and declared that the District of Columbia "is not part of America."

In its Code of Ethics, the Society of Professional Journalists states that journalists should avoid "conflicts of interest, real or perceived" and "political...activities that may compromise integrity or impartiality." By this standard, Emily Miller has no business being the Chief Investigative Reporter for WTTG.

Miller has spent most of her career actively lobbying against D.C.'s democratically-enacted gun laws. This is the behavior of an activist and pundit, not a journalist. Given her record, D.C. residents can't trust that Miller will provide objective coverage on matters of concern to their city. If WTTG is at all concerned with journalistic integrity, it is time for you to part ways with her.

I ask you to fire Emily Miller immediately.
There's a distinct difference between a pro-gun extremist and an objective journalist.
Thank you for your support for this campaign!

Sincerely,

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349 Terrie Williams, Vidor, TX

IND349-79 This is not an environmental comment on the FERC EIS. The FERC does not have authority over the hiring or firing of journalists.

IND349-80 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS

IND349-81 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-82 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-83

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-84

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,

Terrie Williams
850 Laura Lane
Vidor, TX 77662

IND349 Terrie Williams, page 2 of 2

IND349-83 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was “a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas.” Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to “connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon,” and the need for the project “is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove.”

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-84 Comment noted

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

Recent research indicates that methane leakage from natural gas pipelines and LNG compression facilities contribute significantly to greenhouse gas accumulations in the atmosphere. Based on these findings, it is clear that the Pacific Connector/Jordan Cove project will result in measurable negative environmental impacts in Oregon as well as throughout your jurisdiction, the United States.

IND349-85

Methane discharges are just one of the negative environmental consequences of this project, but this factor alone is sufficient grounds to deny approval of the Pacific Connector/Jordan Cove application that is before you.

Your mission, as defined by legislative authority, requires you to protect the public from harm that will result from construction and operation of energy-related facilities. The scientific findings are clear: this project will damage public well-being. You must deny approval of Jordan Cove.

IND349-86

Sincerely,

Diarmuid McGuire

Diarmuid McGuire
696 Siskiyou Blvd #1
Ashland, OR 97520

IND349 Diarmuid McGuire, Ashland, OR

IND349-85 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.

IND349-86 FERC is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. FERC also reviews proposals to build liquefied natural gas (LNG) terminals and interstate natural gas pipelines as well as licensing hydropower projects. The Energy Policy Act of 2005 gave FERC additional responsibilities as outlined and updated Strategic Plan. As part of that responsibility, FERC ensures the safe operation and reliability of proposed and operating LNG terminals. This EIS is part of the process for ensuring this. FERC is not responsible to pipeline safety; the DOT is responsible for the safe operation of pipelines.

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Paul,

As much as I would like to grease the gears of global cooperation and interdependence, I urge you to deny the permit for Veresen to build an export pipeline through southern Oregon, and to do likewise for similar requests.

Transporting natural gas facilitates an environmentally damaging extraction process, and while burning it is clean, there will be leakage of methane in the collection and transportation process. It seems to me that it would be wise to only use NG as an energy source of last resort, as we bridge toward carbon sequestration and renewable generation.

IND349-87

Earth is a factory for creating novel lifeforms, but we as a species have the potential to damage or destroy the framework that makes this evolution possible. Humankind is in the process of moving past our old habits and becoming something wonderful: please help us avoid smashing our nursery as we are born into our future. Let us focus our efforts instead on facilitating energy sources that have no damaging impacts on our planet.

Below is the boilerplate, thank you for your attention.

I Remain,
Ben Farlow

Federal Energy Regulatory Commission (FERC):

I am very concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-88

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-89

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies

IND349-90

IND349 Ben Farlow, Phoenix, OR

IND349-87 It is the Department of Energy, not the FERC, that regulates the U.S. energy policy. See response to IND1-3. Renewable energy options are discussed in section 3.1.4 of the EIS. Because the Project's purpose is to prepare natural gas for export to foreign and domestic markets, the development or use renewable energy technology would not be a reasonable alternative to the proposed action.

IND349-88 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-89 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-90 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-90
Cont'd

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-91

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-92

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,

Benjamin Farlow
212 Cheryl Ln
apt.12
Phoenix, OR 97535

5412246141

IND349 Ben Farlow, page 2 of 2

IND349-91 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was “a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas.” Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to “connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon,” and the need for the project “is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove.”

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-92 Comment noted.

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I attended the hearing you held in Medford, Oregon about the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-93

I found it amazing that you could complete a huge long report on the environmental impact and deliberately ignore the impact on climate change. The terminal would soon become the largest source of climate-changing carbon emissions in our state. And you don't think that has anything to do with the environment?

IND349-94

We're setting records here in Southern Oregon practically every year for hottest seasons ever, least snowpack ever, driest seasons ever. Our ski area used to employ a lot of people. Now, practically no one. And you are going to dramatically add to climate change so some foreign company can make a few bucks? What is a public agency for if it does not protect the public interest?

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-95

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-96

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-97

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-98

IND349 Matt Witt, Talent, OR

IND349-93 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-94 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.

IND349-95 Impacts to threatened and endangered species is addressed in section 4.7 of the EIS. Impacts to fish and birds are addressed in sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-96 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-97 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."

Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-98 Comment noted.

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IND349 **Matt Witt, page 2 of 2**

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a foreign gas company. Please deny this certificate.

Sincerely,

Matt Witt
2721 Quail Run Road
Talent, OR 97540

541-292-6586

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I am very opposed to the proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline. I am particularly disappointed in FERC's Draft Environmental Impact Statement as it is entirely insufficient and fails to demonstrate that there is either a need or public benefit from this project, in Oregon or anywhere else in America.

IND349-99

Direct impacts to public lands and waters from such a massive construction project would significantly harm those ecosystems. Breeding sites of threatened species, including fish and birds, would be destroyed, already polluted streams would face additional pollution, and streams and wetlands that flow with clean water would be warmed and have sediment dumped into them. These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be sufficiently mitigated.

IND349-100

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere. Gas for this project would be fueled by fracking in the interior west of the US and Canada where leaks of methane during the drilling process have been seriously undercounted by some federal agencies. The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be seriously redone and reconsidered as part of this project. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-101

The stated need for this project from the proponents is to continue fracking and to expand fracking. Yet FERC has refused to even include in your analysis the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-102

Information available from the U.S. Energy Information Administration discusses increased prices for all Americans that would result from gas exports. Price increases would not only raise gas prices for working Americans, but would result in a net loss of jobs due to yet more manufacturing moving overseas. We should be working towards energy independence, not exports.

IND349-103

FERC has not sufficiently addressed the dangers of putting a pipeline of this sort through very rugged country subject to wild fires on a massive scale. Nor has FERC adequately addressed the dangers associated with placing the LNG plant in a zone that has experienced massive earthquakes and tsunamis.

IND349-104

The taking of private land through eminent domain when there is little to no public benefit is wrong, as is the scraping of Forest Service Land Management Plans for the benefit of private companies.

IND349-105

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly not in the public interest and would largely benefit a

IND349 Barbara Connes, Ashland, OR

IND349-99 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS

IND349-100 Impacts to threatened and endangered species is addressed in Section 4.7 of the EIS. Impacts to fish and birds are addressed in Sections 4.6 and 4.7. Impacts to streams and waterbodies is addressed in Section 4.4. The EIS describes the mitigation measures that would be required and implemented.

The extraction and burning of natural gas is outside the scope of this EIS; Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND349-101 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-102 See response to comment IND349-97.

IND349-103 Comment noted.

IND349-104 The DEIS discloses the likely Tsunami hazards, earthquake, liquefaction and subsidence issues in section 4.2. See section 4.2.2 for details concerning building the pipeline across the Coast Range and the Cascades.

IND349-105 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. The Commission would make its decision on public benefit in its Project Order.

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IND349 Barbara Comnes, page 2 of 2

foreign gas company. I strongly urge you to deny this certificate.

Sincerely,

Barbara Comnes
retired
444 Park Ridge Pl
Ashland, OR 97520

415-531-5709

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

The proposed Jordan Cove liquefied natural gas (LNG) export terminal and Pacific Connector gas pipeline sounds like a rotten idea.

FERC's Draft Environmental Impact Statement fails to demonstrate that there is either a need for, or public benefit from, this project – in Oregon or anywhere else in America.

IND349-106

The only benefit is to oil & gas companies and their shareholders, regardless of the cost to our EARTH.

Such a massive construction project would significantly harm land, air, and water. Breeding sites of threatened species, including fish and birds, would be destroyed. Already polluted streams would face additional pollution. Streams and wetlands that now flow with clean water would be warmed and have sediment dumped into them.

IND349-107

These direct impacts do not include the long-term harm to our rivers and streams by climate effects from extracting and burning natural gas. These effects cannot be mitigated after the fact.

IND349-108

Natural gas is made up of methane, an incredibly potent greenhouse gas that is 86 times more powerful than carbon dioxide in trapping heat in our atmosphere.

Gas for this project would be fueled by fracking in the interior west of the US and Canada.

The current, best available science from Harvard, Stanford and NASA identifies that the leak calculations must be redone and reconsidered. Impacts from leakage on the climate must be included in FERC's analysis.

IND349-109

FERC has refused to include the impacts of increased fracking throughout gas basins in the Rockies. These impacts must be analyzed.

IND349-110

Due to long term and in many cases permanent impacts on our climate, economy, forests and streams this project is clearly NOT IN THE PUBLIC INTEREST and would largely benefit a foreign gas company.

ENOUGH destruction!

Please deny this certificate.

Sincerely,

Roberta Hill
1812 Bremen Street
Austin, TX 78703

IND349 Roberta Hill, Austin, TX

IND349-106 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND349-107 Effects on the stream fish including temperature and sediment are discussed in section 4.6.2.3.

IND349-108 Harm to ecosystems from global warming is described in section 4.14. Discussion of the global warming potential of methane has been expanded in section 4.12.1.4.

IND349-109 Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND349-110 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

20150213-5144 FERC PDF (Unofficial) 2/13/2015 12:35:14 PM

Paul Friedman
FERC

Federal Energy Regulatory Commission (FERC):

I love the Oregon coast. Let's not uglify it.

Canadians shouldn't be destroying America.

After all the years complaining oil imports, we shouldn't be exporting valuable fossil fuels. | IND349-111

Global warming is real. Let's not exacerbate it. | IND349-112

Let's not harm our public lands and take private lands from the owners. | IND349-113

Thank you.

Matt Wold
135 Camille Ct.
Alamo, CA 94507

IND349 Matt Wold, Alamo, CA

IND349-111 Comment noted.

IND349-112 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.

IND349-113 Comment noted. The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947.

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IND350

IND350 Lynn Hoot-Schofield, Renton, WA

IND350-1 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. Environmental Justice is assessed in Section 4.9.

Lynn Hoot-Schofield, Renton, WA.
My name is Lynn Schofield I am an affected land owner at 1860 Hoover Hill Rd Winston Oregon at mile post 60.11 to mile post 60.26.

This project pits two multibillion dollar companies against poor landowners that live in an socio-economically depressed area and they are attempting to give pennies on the dollar for the land they want to take through Eminent Domain. This is a violation of Federal Statutes and human rights.

Our land is something our father has been worked for, worked hard on and paid for with intent to keep it long term in the family. It has not been the intent of this family to have our land taken from us by a large corporation. This is thievery and is criminal. Just because the government has a role in this does not make it less of theft or a crime. This is a bastardization of the use of Eminent Domain. It was never the intent of our forefathers to have a country that would use government power to support the use of eminent domain for the benefit of a private FOREIGN company (Veresen Energy, a Canadian Corporation) for the export of a product for use by foreigners. Eminent Domain is for the use of the Public Good. In what way is the use of Eminent Domain in the benefit of the Public in this project? There is over 300 affected landowners that will have land taken from them at well below market level and forever their land will be negatively changed. In exchange there will be less than 40 full time jobs created in Coos Bay as a result of this project. The trade off here is insignificant and in no way should be considered in the "Public Good" It is FERC's responsibility to decide this and it is a drastic mistake to allow this and a drastic infringement on the very foundation of American Ideals.

To take the value of our land and the freedom of how we use our land is thievery and criminal once again. Williams Pipeline company has been stalking us, trespassing, misrepresenting themselves and trying to rape the poor landowners of this region. There are peoples lives, health, land, incomes, peace of mind, joy, happiness, and freedom that is trying to be forcefully taken from them.

I know our land to Williams hold no value, but to our families there is no monetary value to replace our lives or our land. Now lets get down to what is truly most important to people, by allowing this project you are robbing people of their dreams of keeping their land sacred for their kids, grandkids and future generations. You are robbing them of their dreams to build, landscape, design and future plan on their own private property. You are robbing them of their dreams to be able to grow and build new creations on their land which is so valuable to witness as other generations pass and new ones are born. The land here is sacred to everyone of us in some way or in some form, whether handed down to us or purchased from a family member, a new homeowner to the area, vacation home, a working ranch or simply a dream in progress. Every landowner has a story as to why they are where they are and where they call home. No one ever chose their home because they were excited about a pipeline coming to town let alone through their own back yard.

IND350-1

20150213-5151 FERC PDF (Unofficial) 2/13/2015 1:09:06 PM

IND350 Continued, page 2 of 2

IND350-2 Comment noted.

There are not enough long term permanent jobs created with this project that even come close to the monetary and emotional damage this pipeline will have to property owners and their neighbors.. forever.

When the wells and steams dry up and the flow of potable water has shifted due to upsetting the land with this pipeline, who takes care of our water supply? Why would Williams come back to a home to repair this when they know the landowner cant afford to fight them? The future problems and damages this pipeline is bound to create are also a form of Williams taking advantage of this poor under-educated people and this socio-economically depressed area.

Keep your pipeline but at your own expense. Reroute through land far from our's and our neighbors. For safety reasons reroute it so we can use our land within the law as we choose to. Reroute it so we can be assured our water and neighbors water source is unharmed of pollution and flow. Reroute it because it is an export line and not an import line. As an American it should be that this request be adhered to along with all other requests of all natures be adhered to as well.

Do the right thing. The right thing, not the easy thing. Deny this project.

Lynn Schofield

IND350-2

20150213-5156 FERC PDF (Unofficial) 2/13/2015 1:15:01 PM

IND351

IND351 Jennifer Van Datta, Talent, OR

IND351-1 Comment noted.

IND351-2 Comment noted.

Jennifer Van Datta, Talent, OR.

I am writing in support of the Jordan Cove LNG terminal and the Pacific Connector Gas Pipeline. This project will have a huge and very positive impact on the economy of Oregon's South Coast and the State of Oregon. Oregon has some of the strictest land-use and environmental laws in the United States. I believe this project can be built and operated in a responsible way with as little negative impact as possible. The developer has demonstrated their commitment to safety and to being a good neighbor to the community of Coos Bay-North Bend.

IND351-1

The thousands of construction jobs will give Oregon's economy a much-needed boost and this is great, but I believe the long-term effects of this project are an even more compelling reason for it to be built. This project is only the beginning of the development of the South Coast. The development of the port will attract more industry and commerce to the area. It is ridiculous to think that all business should be conducted in Portland and the south coast should focus on tourism. Tourism only brings in low-wage jobs that do not contribute to the economy.

The increased natural gas capacity of the pipeline will also help the economy in Jackson, Klamath and Douglas Counties. I will contribute to the tax base and make it possible for industries who rely on natural gas to locate in these areas.

IND351-2

Folks are having a hard time with the pipeline and I understand this. What these people do not realize is that the pipeline can also be built and operated in a responsible way with as little impact on the environment as possible. The developer has demonstrated a commitment to negotiating with property owners to do as much as possible to lessen the impact on their properties. The people of the state of Oregon voted in favor of our existing land-use laws. Those laws are being followed. It is a waste of time and energy to fight against existing laws. The time and energy would be better spent making sure the laws are followed.

I am a native Oregonian. I have watched our timber-based economy dwindle away with nothing viable to replace the good-paying jobs that support families. Jordan Cove is a project that can help fill this void. Please move forward with the permitting process so this project can get underway.

Thank you,
Jennifer Van Datta
Talent, OR

20150213-0010 FERC PDF (Unofficial) 02/13/2015

ORIGINAL

CP13-483

IND352

February 3, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Dear Secretary Bose,

The impacts of the proposed Jordan Cove liquefied natural gas (LNG) terminal and Pacific Connector gas pipeline have me deeply concerned. FERC's Draft Environmental Impact Statement for this proposal in Oregon is sorely insufficient and fails to demonstrate that there is any public need for this project.

The extraction, transport and eventual burning of fracked gas should not be considered a bridge fuel. Natural gas is predominantly methane. Leakage occurs in drilling and production, transmission, processing and refining, and distribution including liquefaction into LNG, its transport, regasification and redistribution). These fugitive methane emissions are critical factors in the life-cycle pollution of natural gas.

While burning methane directly releases significantly less carbon dioxide than burning other fossil fuels, unburned methane is 86 times more potent at trapping heat in the atmosphere than coal over a 20-year period. Recent studies from Stanford to NASA point to the life-cycle of gas being as bad for the climate as coal. Shockingly, the impacts of this proposal on our climate are not addressed in your analysis.

Similarly, exporting gas to new markets would accelerate fracking, yet the impacts of increased fracking to feed this export project are not analyzed in your document.

We need good jobs, not temporary construction jobs in fossil fuel development. The U.S. should be a leader in shifting us away from fossil fuels and into a robust renewable energy culture. One million dollars of investment in oil and gas development creates 5 jobs. The same amount of investment in solar creates more than 14 jobs. (Read more here: http://www.peri.umass.edu/fileadmin/pdf/other_publication_types/green_economics/economic_benefits/economic_benefits.PDF)

Finally, the U.S. Energy Information Administration tells us that exporting gas and bringing American consumers into competition with the world market for gas would raise rates for the average American. Higher gas prices would harm ratepayers and domestic manufacturing by shipping more jobs overseas.

This project is clearly not in the public interest and is only convenient for a foreign-owned gas company. I urge you to deny the certificate for this project.

Thank you for your time and consideration,
Julie Correla
POB 391752
Cambridge MA 02139

FILED
FEDERAL ENERGY
REGULATORY COMMISSION

2015 FEB 13 A 11:24

FEDERAL ENERGY
REGULATORY COMMISSION

IND352 Julie Correla, Cambridge, MA

IND352-1 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND352-2 Comment noted.

IND352-3 There is no evidence that the Project would result in higher domestic natural gas prices. See response to IND37-4. The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

IND352-1

IND352-2

IND352-3

20150213-0012 FERC PDF (Unofficial) 02/13/2015

IND353

Thursday, February 5, 2015

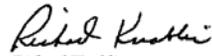
Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Re: Supplemental Information
Jordan Cove Energy Project, L.P., FERC Docket No. CP13-483-000

Dear Ms. Bose:

I have reviewed the Draft Environmental Impact Statement and disagree with FERC's findings. As with any project, the community and environment would be affected to a certain degree, however the mitigation measures Jordan Cove Energy (JCE) has proposed and/or agreed to incorporate into both the short and long term construction/operation of these facilities does not begin to ameliorate these adversities.

In reviewing this document it is evident that both FERC and JCE have gone above and beyond in ensuring this project will be a success for Veresen, but a total disaster for affected landowners, citizens of North Bend/Coos Bay, and the environment of Southern Oregon. Veresen has violated NEPA rules by trying to influence local governments in its favor. I ask that FERC deny JCE their permit for this project.


Richard Knablin
555 Delaware St.
North Bend, OR 97459

ORIGINAL

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FEDERAL ENERGY REGULATORY COMMISSION
2015 FEB 13 A 11: 28
FEDERAL ENERGY REGULATORY COMMISSION

IND353 Richard Knablin, North Bend, OR

- IND353-1 The EIS concludes that the mitigation measures would reduce most impacts to non-significant levels.
- IND353-2 No NEPA rules have been violated. It is the agency, not the applicant, that must comply with the NEPA.

IND353-1

IND353-2

20150213-5163 FERC PDF (Unofficial) 2/13/2015 1:27:59 PM

IND354

Kimberly Bose
Federal Energy Regulatory Commission

Secretary

Dear Federal Energy Regulatory Commission,

I am deeply concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) terminal and Pacific Connector gas pipeline. FERC's Draft Environmental Impact Statement for this proposal in Oregon is sorely insufficient and fails to demonstrate that there is any public need for this project.

IND354-1

The extraction, transport and eventual burning of fracked gas cannot be considered a bridge fuel. Natural gas is predominantly methane. Leakage occurs in drilling and production, transmission, processing and refining, and distribution including liquefaction into LNG, its transport, regasification and redistribution). These fugitive methane emissions are critical factors in the life-cycle pollution of natural gas.

IND354-2

While burning methane directly releases significantly less carbon dioxide than burning other fossil fuels, unburned methane is 86 times more potent at trapping heat in the atmosphere than coal over a 20-year period. Recent studies from Stanford to NASA point to the life-cycle of gas being as bad for the climate as coal. Shockingly, the impacts of this proposal on our climate are not addressed in your analysis.

IND354-3

Similarly, exporting gas to new markets would accelerate fracking, yet the impacts of increased fracking to feed this export project are not analyzed in your document.

IND354-4

We need good jobs, not temporary construction jobs in fossil fuel development. The U.S. should be a leader in shifting us away from fossil fuels and into a robust renewable energy culture. One million dollars of investment in oil and gas development creates 5 jobs. The same amount of investment in solar creates more than 14 jobs. (Read more here: <http://bit.ly/18uXFPX>)

IND354-5

Finally, the U.S. Energy Information Administration tells us that exporting gas and bringing American consumers into competition with the world market for gas would raise rates for the average American. Higher gas prices would harm ratepayers and domestic manufacturing by shipping more jobs overseas.

IND354-6

This project is clearly not in the public interest and is only convenient for a foreign-owned gas company. I urge you to deny the certificate for this project.

Thank you.

Ms. Erma Lewis
1736 63 Street
Brooklyn, NY 11204

IND354-7

IND354 Erma Lewis, Brooklyn, NY

IND354-1 The FERC's EIS is sufficient. The EIS is not a decision-document. The Commission would make its finding of public need in its decision-document Project Order. The Commission would issue its Order after we have produced an FEIS.

IND354-2 See responses to comments IND6-1 and IND7-2.

IND354-3 See response to comment IND5-2.

IND354-4 There is no evidence that exporting LNG would induce domestic production of natural gas, including increasing fracking. See response to CO1-1.

IND354-5 Renewable energy options are discussed in section 3.1.4 of the EIS. Because the Project's purpose is to prepare natural gas for export to foreign and domestic markets, the development or use renewable energy technology would not be a reasonable alternative to the proposed action. The project's impacts to jobs and the local economic conditions are addressed in Section 4.9.

IND354-6 See response to IND37-4.

IND354-7 This submittal contained 1054 separate signed letters; the majority of which are identical or near-identical copies of this first letter. Identical letters and those with non-substantive differences, as well as other duplicate letters, have not been individually coded, and have been removed from this EIS appendix. Those letters that had substantial differences from this initial letter were coded separately within this submittal and are presented in this Appendix to the EIS. The complete filing, which contains all identical letters as well as all 1054 signatures can be accessed on the eLibrary under accession number 20150213-5163.

20150213-5163 FERC PDF (Unofficial) 2/13/2015 1:27:59 PM

Kimberly Bose
Federal Energy Regulatory Commission

Secretary

Dear Federal Energy Regulatory Commission,

I am deeply concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) terminal and Pacific Connector gas pipeline. FERC's Draft Environmental Impact Statement for this proposal in Oregon is sorely insufficient and fails to demonstrate that there is any public need for this project.

IND354-8

We continue to postpone facing up to the critical challenge of climate change. Until we recognize all the harm done by dependence on fossil fuels, we will continue to compound that harm by releasing green house emissions. Gas is no better than any other fossil fuel, when all of its impacts are weighed, including the release of methane.

IND354-9

We seem to be in denial still, largely because of limited economic interests we've been unwilling to alter. We are past due in this responsibility. Every step in the direction of continued reliance on fossil fuels is actually a step into greater difficulty for my grandchildren. How can we as a people allow ourselves to act in that way?

Climate change already is altering our world, creating refugees, contributing to armed conflicts, and limiting food production. Natural gas as now often acquired limits good water, making waste water which is a problem we've, again, not yet been willing to face.

Exporting dirty fuels abroad is a service only to a very limited minority of people, who themselves are not served when all of the harms are allowed to accumulate.

We must have courageous leadership that can help us through this challenging time to a future more in accord with the welfare of all we love. Please, do not permit this Jordan Cove Gas Export plan.

Thank you.

Mark Meeks
399 Blackbird Dr.
Bailey, CO 80421

IND354 Mark Meeks, Bailey, CO

IND354-8 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS

IND354-9 See responses to comments IND354-1 and IND1-1. If exported LNG is burned as natural gas in place of coal in power plants in Asia, it may reduce world-wide GHG.

20150213-5163 FERC PDF (Unofficial) 2/13/2015 1:27:59 PM

Kimberly Bose
Federal Energy Regulatory Commission

Secretary

Dear Federal Energy Regulatory Commission,

Tax all US exports of NG, this source of clean Energy should be used first in the USA! | IND354-10

I am deeply concerned about the impacts of the proposed Jordan Cove liquefied natural gas (LNG) terminal and Pacific Connector gas pipeline. FERC's Draft Environmental Impact Statement for this proposal in Oregon is sorely insufficient and fails to demonstrate that there is any public need for this project. | IND354-11

The extraction, transport and eventual burning of fracked gas cannot be considered a bridge fuel. Natural gas is predominantly methane. Leakage occurs in drilling and production, transmission, processing and refining, and distribution including liquefaction into LNG, its transport, regasification and redistribution). These fugitive methane emissions are critical factors in the life-cycle pollution of natural gas. | IND354-12

While burning methane directly releases significantly less carbon dioxide than burning other fossil fuels, unburned methane is 86 times more potent at trapping heat in the atmosphere than coal over a 20-year period. Recent studies from Stanford to NASA point to the life-cycle of gas being as bad for the climate as coal. Shockingly, the impacts of this proposal on our climate are not addressed in your analysis. | IND354-13

Similarly, exporting gas to new markets would accelerate fracking, yet the impacts of increased fracking to feed this export project are not analyzed in your document. | IND354-14

We need good jobs, not temporary construction jobs in fossil fuel development. The U.S. should be a leader in shifting us away from fossil fuels and into a robust renewable energy culture. One million dollars of investment in oil and gas development creates 5 jobs. The same amount of investment in solar creates more than 14 jobs. (Read more here: <http://bit.ly/18uXfPX>) | IND354-15

Finally, the U.S. Energy Information Administration tells us that exporting gas and bringing American consumers into competition with the world market for gas would raise rates for the average American. Higher gas prices would harm ratepayers and domestic manufacturing by shipping more jobs overseas. | IND354-16

This project is clearly not in the public interest and is only convenient for a foreign-owned gas company. I urge you to deny the certificate for this project.

Thank you.

David Grant
211 Stanford Ave
Medford, OR 97504

IND354 David Grant, Medford, OR

IND354-10 Comment noted.

IND354-11 See response to IND354-1.

IND354-12 See responses to IND6-1 and IND7-2.

IND354-13 See response to IND5-2.

IND354-14 See response to IND354-4.

IND354-15 See response to IND354-5.

IND354-16 See response to IND37-4.

20150213-5167 FERC PDF (Unofficial) 2/13/2015 1:50:16 PM

IND355

IND355 Paul M. Washburn, Coos Bay, OR

Paul M. Washburn, Coos Bay, OR.
I would like to comment on page 5-28 (Conclusions and Recommendations) of the DEIS for the pipeline.

Section 9 is totally inadequate. You have not provided the affected property owners with any criteria to comment on. You give total authority for developing the criteria to Pacific Connector. Throughout the rest of the DEIS, you lay out many specifics as to how Pacific Connector will satisfy Federal agencies' requirements. You nothing of the sort for private landowners.

IND355-1

In Section 9.a.(1), you should spell out how long Pacific Connector has to respond. I would suggest one hour. Why? Because if the issue is an excavator tearing up a stream or other aspects of the property, time is of the essence. They can do a lot of damage in just a few minutes.

IND355-2

In 9.a.(2), the same issue applies. My recommendation is that one hour is more than generous. This procedure should also spell out that if Pacific Connector does not respond within these time frames, a \$1,000.00 per hour (it takes to respond) fine will be assessed, payable to the landowner. Remember, this is a penalty for not getting back to the property owner in a timely fashion, not a fine for how long the resolution will take.

IND355-3

Section 9.a.3) This appears to be a way for both Pacific Connector and FERC to "push off" any meaningful resolution to a point where the property owner is left with nothing do do but accept whatever damage has been done. This is unacceptable. At the very least, if this step is going to have any "teeth" the procedure should spell out how soon the FERC will respond. My request would be within four hours of the complaint being made. Again, timeliness is everything in these instances.

IND355-4

Finally, this procedure is a perfect example of how you have made sure the Federal agencies' and Pacific Connector's needs are met (throughout the DEIS) and made few, if any provisions for the "small people". I expect more from my government.

Thank you.

- IND355-1 This is a standard FERC recommendation which has worked adequately for many other projects.
- IND355-2 See response provided above.
- IND355-3 See response provided above.
- IND355-4 See response provided above.

20150213-5170 FERC PDF (Unofficial) 2/13/2015 2:05:32 PM

IND356

IND356 David Schneider, Tolland, CT

David Schneider, Tolland, CT.
12 February, 2015

Dear FERC Commissioners,

I am registering my opposition to the Jordan Cove, Coos Bay liquification facility and shipping terminal project.

It has become obvious to me that the objective of the majority of the proposed pipeline additions and expansions and the proposed building of natural gas liquification and LNG storage and shipping facilities, on both our coasts, is primarily for the purpose of selling LNG abroad. While FERC's responsibility for oversight in the construction and operational safety to protect the public and the environment is inherently significant, I am firmly convinced that FERC is a party to a decision that can prove to be extremely detrimental not only to the health and well being of the people of America but to our environment and even our economy.

IND356-1

As for the health and well being of the people and the detriment to our environment, FERC's decisions on all these projects should not be taken separate from the fact that natural gas extracted by, hydraulic fracturing, results in tremendous volumes of highly toxic waste water that is unrecoverable as safe water. This toxic waste water is presenting a hazardous situation that may very well lead to the contamination of ground water and surface water body pollution that can never be mitigated. This parallels the situation America has with the nuclear industry's spent fuel rods. Actually, the magnitude of the disposition of fracked waste water will exceed that of nuclear industry's problem because of the almost unfathomable volume of waste water building up daily. The volume of fracked gas required to meet the projected needs for export of LNG at the Jordan Cove, Goldboro, NS and other planned LNG liquification facilities will exacerbate the hazards of this toxic fracked waste water problem.

IND356-2

Additionally, an accident at a liquification or storage facility, or at an LNG terminal port, and indeed at sea can harm aquatic life and potentially destroy a fishery. These dangers are real and represent a threat to safety and well being but there is also a threat to our economy.

IND356-3

I refer here to the east coast projects pending approval to highlight this threat. The pipeline expansion projects there, in my opinion, are being moved forward based on lies from the gas producers and others to the public and to governmental leaders whereby the producers continually indicate that the pipeline expansions are for domestic use and emphatically they state that they are not intended for export. My reference is to the Canadian energy company Pieridae Energy.

IND356-1 The purpose of natural gas projects under the FERC's jurisdiction is generally to transport the product from places of production to markets. Most of the projects before the Commission are natural gas pipeline facilities, not LNG terminals. The Commission has not yet made a decision on whether or not to authorize the Jordan Cove-Pacific Connector Project.

IND356-2 See response to IND6-1.

IND356-3 Section 4.13 discusses the reliability and safety for the Project.

20150213-5170 FERC PDF (Unofficial) 2/13/2015 2:05:32 PM

IND356 Continued, page 2 of 2

Pieridae Energy has received approval from the government in Nova Scotia, Canada to build an enormous LNG processing and shipping facility for export of LNG to Europe and India. They are now seeking the Canadian government's, National Energy Board's, approval to import "...up to 1.0 billion cubic feet per day (Bcf/d) of natural gas through the existing pipeline systems between Canada and the United States, and export up to 1.4 Bcf/d of natural gas, as LNG, from Goldboro, NS, to international markets." (As quoted from Pieridae's latest news that appears on their website.)

Furthermore, we have definitely been lied to for most of the past two years. Pieridae has approached natural gas suppliers in Canada and the U.S. to assure the supply they need to meet their contracted volume."Pieridae is in advanced discussions with several natural gas producers, pipeline operators and LNG customers. In June 2013, Pieridae entered into a 20-year sales agreement with E.ON Global Commodities SE, a subsidiary of one of the world's largest investor-owned power and gas companies, to deliver approximately 5 MMTEA of LNG from Goldboro LNG to E.ON." (As quoted from Pieridae's latest news that appears on their website.)

Additionally even if all this goes as they plan, Pieridae's can't begin shipping before 2020. In the next five years, New England, America, Europe and India can advance making huge strides in the development of alternative energy resources and the development of projects and devices to reduce wasted energy resources through new technological advances. This would negatively impact demand of LNG and prove to be a wrong road wasted investment by all concerned parties to the investment of public and private funds in all phases of these projects. That includes fracking, pipeline expansions, liquification plants, storage facilities, shipping terminals, etc.. "Pending receipt of all necessary regulatory and government permits and a positive final investment decision in 2015, Pieridae anticipates construction taking four years, with Goldboro LNG being commercially operational in 2020." (As quoted from Pieridae's latest news that appears on their website.)

Thank you for considering my opposition to the Coos Bay proposals.

Respectfully,

David Schneider
Tolland, CT 06084

20150213-5176 FERC PDF (Unofficial) 2/13/2015 2:09:19 PM

IND357

Vanya Sloan, Ashland, OR.
I am against granting Pacific Connector Pipeline a Certificate of
Operation to create a pipeline in order to pump natural gas across over
200 miles of Southern Oregon. This project, if approved, would be of
little benefit to Oregonians. It will take valuable land from Oregonians
and destroy natural environments. All of this in order to enrich the
corporate owners, and provide a few temporary jobs. | IND357-1

I strongly urge you to deny the request for this LNG pipeline.

Thank you.

Vanya Sloan

IND357 Vanya Sloan, Ashland, OR

IND357-1 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

20150213-5183 FERC PDF (Unofficial) 2/13/2015 2:23:14 PM

IND358

sarah anderson, roseburg, OR.
This pipeline has no support from my family or me. I do not believe that anyone within government who allows this to be constructed has the citizen's best interest in mind.

The fire departments don't have enough resources to handle a potential leak or accident. The 10% rate of weld checking is dismally inadequate. Inadequate piping strength is being used in rural areas because the "perceived" threat is lower. This is unacceptable. When there is a problem, the local residents will have to suffer. I am completely outraged for my fellow citizens who do not want this to go through their property, and it is being considered anyways. Eminent domain being used for corporate interests is unacceptable. There is no good reason for these plans to be approved.

For the jobs that are claimed to be good for local citizens to be legitimately beneficial they would need to promote sustainable and clean jobs that last, not jobs that promote the continual degradation of our land and will likely be temporary, anyways.

I hope the federal energy regulatory commission does not approve this LNG pipeline so we can avoid disastrous consequences if, and when, a problem occurs. The ecosystems and citizens in the nearby area demand, and deserve, more.

IND358-1

IND358-2

IND358-3

IND358 Sarah Anderson, Roseburg, OR

- IND358-1 Fire departments are discussed in section 4.9 of the EIS. See response to IND2-3. Safety is discussed in section 4.13.
- IND358-2 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. The Commission would make its decision on public benefit in its Project Order.
- IND358-3 Jobs are discussed in section 4.9.

20150213-5185 FERC PDF (Unofficial) 2/13/2015 2:25:46 PM

IND359

Paul M. Washburn, Coos Bay, OR.

In Section 5.0, page 518, there is a statement about property values being affected. While I am sure there are all sorts of studies on the pros and cons of this argument, there is one issue you can't deny: that of the consequences of the pipeline installation on the geography of the site which, in turn, will affect the property value.

IND359-1

In our case, the preferred route will cross an unnamed stream that is the sole source of water to our neighbors, an adjunct for water usage by another, and (most importantly to us) it provides all of the water to our 165ft. by 85ft. pond. This pond is a major aspect to the landscape of our 10 acre property. We have extensively (expensively, too) landscaped around it. Our house is situated to take advantage of the view. Without it, there is no water feature with all of it's amenities (thus, no value). I don't think there can be any (legitimate) argument that losing the pond would negatively affect the value of our property.

IND359-2

If anything were to happen to the stream and the water somehow was diverted elsewhere, we would end up with a huge sump with virtually no eye appeal. No eye appeal, no value to the property. If this were to happen, then it means "lawyering up" to get some sort of compensation. What a way to do business(not)!

Which leads me to a comment I made in December to the FERC in Coos Bay. You can avoid any impact to me and my neighbors by adopting the Blue Ridge Alternative Route (Section 3.4.2.2) in preference to the proposed route. The Blue Ridge alternative would affect no homes or their access to water. It does not cross any residentially zoned property. No one would be harmed by it. And, the fact that it is located on a ridgeline meets one of the requirements that both the FERC and Pacific Connector says (repeatedly throughout the DEIS) makes for an easier construction of the pipeline. I know there have been previous letters to you that address the specifics of other environmental issues related to the Blue Ridge Alternative, so I will not delve into them here. But, please, follow the logic. You've already made the justification, spelling it out throughout the DEIS.

IND359-3

Thank you.

IND359 Paul M. Washburn, Coos Bay, OR

- IND359-1 Impacts on landowners whose property would be crossed by the pipeline route, including effects on property values as well as the possibility of eminent domain, are discussed in section 4.9.2.3 of the DEIS.
- IND359-2 Impacts on waterbodies are discussed in section 4.4. Should it be determined that there has been an impact on a water supply, Pacific Connector would work with the landowner to ensure a temporary supply of water, and if determined necessary, Pacific Connector would replace the affected water supply with a permanent water supply. Mitigation measures would be specific to each property, and would be determined during landowner negotiations. Likewise, Pacific Connector would be responsible for paying for damages to landscaping, as discussed in section 4.1.2.3.
- IND359-3 The Blue Ridge Alternative is considered in section 3.4.2.2.

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IND360

Jan Waitt, Ashland, OR.

A Canadian-based private company, Veresen has proposed this project, the largest private investment in Oregon's history. The company is taking economic advantage of four economically stressed counties in Southern Oregon offering short-term financial gain and a few jobs in exchange for very long-term environmental destruction, not only in Southern Oregon, but on a global scale through increased climate change emissions. Veresen is assured the profits. Southern Oregon is assured the damage.

The negative environmental impact alone should be enough to realize that this project is not in the public interest.

- The FERC report does not take into consideration that the LNG terminal is being built in the earthquake subduction zone and tsunami area of Coos Bay. What would happen if the power plant stopped working. It would quickly be a Fukushima replay.

- The completed LNG plant and needed power plant would become the largest polluter in the State of Oregon.

- The proposed LNG plant is being built on an existing marshland destroying wildlife habitat.

- The proposed 230-mile Pacific Connector pipeline crosses five major rivers and 400 streams and smaller rivers in which wildlife and salmon restoration project are just making progress.

- A 50-90 foot access lane would cut through both U.S. Forest Service, BLM and private property leaving a deforested scar, reducing property values, opening access for off-road vehicles and hunters further damaging wildlife habitat.

- The land is left with a potential 36-inch underground pipe bomb. What happens when even a small leak explodes and ignites a forest fire or pours oil into a river? Since 2002, there have been 95 "significant" gas transmission incidents involving Williams, the pipeline construction company. Since May of 2013, there have been four explosions in Williams-owned facilities. Obviously this company is profiting at the expense of safety?

IND360-1

IND360-2

IND360-3

IND360 Jan Waitt, Ashland, OR

IND360-1 The Commission would consider public interest in determining whether or not to authorize the Project. Potential impacts from an earthquake and tsunami are discussed in section 4.2 of the EIS.

IND360-2 As discussed in section 4.5, the right-of-way would be revegetated, except for trees within 15 feet of the centerline. Impacts on private property is discussed in section 4.9. ORV impacts are discussed in section 4.10. Impacts on habitat are discussed in section 4.5.

IND360-3 The pipeline is not a bomb. The United States has tens of thousands of miles of 36-inch and larger gas pipelines. Accidents are uncommon but do occur, as discussed in section 4.13.9.2 of the DEIS.

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IND361

IND361 Rick E. Skinner, Coos Bay, OR

Rick E Skinner, Coos Bay, OR.
I have reviewed the Draft Environmental Impact Statement and concur with FERC's findings. As with any project, the community and environment will be affected to a certain degree. The mitigation measures Jordan Cove Energy (JCE) has proposed and/or agreed to incorporate into both the short and long term construction/operation of these facilities drastically reduces these adversities. In reviewing this document it is evident that both FERC and JCE have gone above and beyond in ensuring this project will be a success to all parties involved. I ask that FERC proceed with the permitting process to grant Jordan Cove Energy and Pacific Connector Gas Pipeline, their permits for this project. I also urge you to review the alternate Blue Ridge Route for the pipeline. Although both are viable options, it appears that the Blue Ridge Route would be a more suitable region, as it affects less private parcels, and above all greater public safety both during construction and operation.

IND361-1

IND361-1 Comment noted.

IND361-2

IND361-2 The Blue Ridge Alternative is considered in section 3.4.2.2.

20150213-5216 FERC PDF (Unofficial) 2/13/2015 2:50:33 PM

IND362

February 13, 2015

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE, Room 1A
Washington, DC 20426

Comments on the
**Jordan Cove Energy and Pacific Connector Gas Pipeline Project Draft
Environmental Impact Statement**
Docket Numbers CP13-483 and CP13-492

Dear Kimberly,

I request that you consider my comments in regards to the Draft Environmental Impact Statement (DEIS) issued on November 7th, 2014 on the Jordan Cove Energy Project and Pacific Connector Gas Pipeline. After reviewing the 5000 page DEIS, it is clear that FERC failed to recognize several important issues pertaining to this project and does not have sufficient alternatives or actions to address them. Listed below are the key issues that must be more adequately addressed in relation to this project.

- The current 90 day comment period is insufficient in allowing the public enough time to read and comprehend the 5000 page DEIS document. For a project this large and complex, an allowance of an extension of at least 30 days should be granted as has been asked for by many including Oregon State Senator Ron Wyden.
- The DEIS analysis for this project fails to consider the true dangers of this project in regards to its impacts on climate change. The Intergovernmental Panel on Climate Change determined that by 2050, we must have reduced our reliance on fossil fuels by over 80%. FERC failed to consider how this massive fossil fuel project would fit into that reduction.
- The proposed Pacific Connector Pipeline would transport American gas to shipping tankers in Coos Bay for overseas distribution. This completely undermines American energy independence and will subsequently result in the export of US manufacturing and related jobs that should stay here in the states.
- FERC failed to truly consider the imminent dangers of building a liquefied natural gas terminal in a substantial geologic subduction zone, which is at risk for a major seismic event and subsequent tsunami. It is not a question of "if" but "when" a major earthquake and tsunami will occur and by locating the LNG terminal, tankers, associated power plant and pipeline in such close proximity to a community of roughly 26,000 is putting at risk the lives of thousands of Oregonians.
- The FERC DEIS fails to consider the impacts of increased hydraulic fracturing or "fracking" that will occur if this project is completed. If this pipeline and terminal

IND362-1

IND362-2

IND362-3

IND362-4

IND362-5

IND362-6

IND362 Robyn Janssen, Ashland, OR

- IND362-1 Alternatives are discussed in section 3 of the EIS.
- IND362-2 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.
- IND362-3 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.
- IND362-4 It is outside the scope of this FERC EIS to assess the overall energy policy of the nation. Furthermore, management and jurisdiction over the national energy policy is the role of the U.S. Department of Energy, not the FERC. The project's impacts on jobs is addressed in section 4.9 of the EIS.
- IND362-5 Potential impacts from an earthquake and tsunami are discussed in section 4.2 of the EIS.
- IND362-6 See response to IND6-1. Impacts on waterbodies are discussed in section 4.4 of the EIS. Impacts on fish in section 4.6. Removal of vegetation is discussed in section 4.5. The Project should not result in the release of natural occurring mercury from soils; see response to IND2-8.

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- are built, fracking in the intermountain west and Canada will increase and should be considered a cumulative impact within the DEIS document.
- The construction of the 230-mile pipeline will have substantial impacts to roughly 400 waterways throughout southern Oregon. Impacts would include trenching through streams, sediment from the cleared pipeline route, the removal of crucial streamside vegetation and the mobilization of naturally occurring mercury. This region is known for its iconic salmon populations, many of which are struggling and/or endangered. Impacts from this project to their waterways and habitat will increase the threats to their survival.
 - The construction of the 230-mile pipeline will require 95-foot wide clear-cuts through old growth forests, public and private lands. These forests are important to the health of our waterways and wildlife, which would be compromised and fragmented should construction occur. FERC failed to recognize the true impacts to endangered species such as the spotted owl, the marbled murrelet and the coho salmon that depend on these forests and the role they play for vital habitat and clean water.
 - The company contracted to build the Pacific Connector pipeline (Williams Company) does not have a good track record in regards to pipeline safety. In 2014 alone, the company had 3 gas facilities or pipelines explode causing damage to human life and infrastructure. The communities of North Bend and Coos Bay will be put at great risk in their proximity to the LNG terminal and associated gas pipeline.
 - The safety standards for the Pacific Connector pipeline are not acceptable for rural areas along the pipeline route. Lower safety standards should not be allowed through these areas as these areas will be the ones prone to wildfire should a gas leak or break occur, and do not have the emergency response infrastructure to handle any sort of major emergency situation.
 - The extensive dredging of the Coos Bay estuary and bay will have major impacts on the sensitive ecosystem that occurs there. The mobilization of toxic soils, the removal of important sediments and the decimation of estuarine species will negatively alter the bay and everything that depends on it.
 - Eminent domain and its seizure of private property for the benefit of a foreign energy company is completely un-American and not the proper use of eminent domain. Eminent domain is clearly defined as the right of a government to expropriate private property for PUBLIC USE, with payment or compensation. This project is clearly not for the public and will only benefit foreign companies and Asian markets.
 - Public need and necessity for this project is non-existent. Oregon does not need this project nor do we need the gas that we aren't even being offered. The only so called "need" and "necessity" for this project is for the benefit of the out of state energy and pipeline companies and their shareholders and should not be considered in this decision.

IND362-6
Cont'd

IND362-7

IND362-8

IND362-9

IND362-10

I was born and raised in southern Oregon and continue to live here because of the quality of life it offers me, my friends, my family and neighbors. We as Oregonians

IND362 Continued, page 2 of 3

- IND362-7 Impacts on forest is discussed in section 4.5. Marbled murrelets and spotted owls are discussed in section 4.7.1.2. Coho salmon are discussed in section 4.7.1.3.
- IND362-8 Pipeline safety is discussed in section 4.13. The DOT sets safety and design standards. Dredging in Coos Bay is discussed in section 4.4. No toxic substances have been identified in testing of the sediments to be dredged for the proposed Jordan Cove terminal access channel.
- IND362-9 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947.
- IND362-10 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

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IND362 Continued, page 3 of 3

are proud of where we live, where we come from and take great pride in our state and what it has to offer. We do not take kindly to having it threatened, decimated and taken over by a foreign corporation who cares nothing about us and what we stand for; only about their profits. Southern Oregon is not a sacrifice zone and we do not want this project in our state...period.

I ask that FERC **deny the permit** for the Jordan Cove Energy and Pacific Connector Gas Pipeline Project proposal.

IND362-11

Robyn Janssen
615 Oak St.
Ashland, Oregon 97520

IND362-11 Comment noted.

20150213-5218 FERC PDF (Unofficial) 2/13/2015 3:00:44 PM

IND363

Annice O Black, Ashland, OR.
Old Ferry Road. Due to the incomplete part of the DEIS regarding Cultural Resources I would like to bring to your attention the Historic River Crossing on the Old Ferry Road at Shady Cove Oregon. To include in your HPMP Historic Properties Management Plan. page 5-2.

IND363-1

In 1984 Southern Oregon Historical Society Roads and Trails project. Placed a marker at the crossing of the old Ferry across the Rogue River. Approximate current address 1245 OLD FERRY RD EAGLE POINT/COUNT, The property owner on the other side of the river permitted the marked to be place on their property. Approximate current address 22628 HWY 62 SHADY COVE.

The choice of the Old Ferry Road does not include this historically significance mark of the history of transportation and river crossing in the Pioneer days of Southern Oregon.

3.4.2.9 East Side of the Rogue River Access Alternatives - Rogue River Crossing Access Road
During the scoping period, landowners along Old Ferry Road raised concerns about the use of that road for access to the HDD drill site on the east side of the Rogue River during pipeline construction.¹⁵ Therefore, Pacific Connector researched the possibility of finding other alternative access roads to the east side of Rogue River crossing, in the vicinity of MP 123.0.

IND363-2

A brief history of the Ferry Crossing at Shady Cove follows.

The Free Ferry 1891. Most of the ferries , a few early bridges and roads were operated by private individuals , who were allowed to charge a toll for their use by travelers. Licenses were granted by the Board of Commissioners for most of them , up on paying a fee, and posting a cash bond.

In 1889 the Oregon state Legislature passed a law enabling counties to establish free ferries . where necessary.

On May 9, 1891, A.J. Dailey and 56 others filed a petition for a free ferry on Rogue River , near the site of the "Old Nail Ferry." The court acknowledged the law passed by the 1889 legislature regarding free ferries. But they asked their attorney, C.W. Kahler for a legal of the Court's attorney " to establish free ferries across the streams of Jackson County." (Vol.9 P. 59 C.J)

At the next session of the court June 3, 1891, they were advised that the Court does have power to authorize a free Ferry. Therefore they advertised for bids to build a new ferry boat, according to plans and specifications on file in the county office. Said boat was "to be delivered on Rogue River near what is known as the 'Old Nail Ferry' site, (Vol.9 P .186)

At the same time, they advertised for bids for a ferryman to operate the ferry. These were to be received until August 5, 1891.

In the July session they considered three bids for building the ferry boat, which had been received, as follows:

George Clements \$268.00

IND363 Annice O. Black, Ashland, OR

IND363-1 The pipeline does not cross the Rogue River at the mouth of Indian Creek, and therefore, the pipeline crossing is not exactly where the ferry was located. The pipeline crossing would be near the community of Trail. Pacific Connector's cultural resources consultant conducted a pedestrian inventory along the route crossing the Rogue River and no cultural resources were recorded at that location. Any remains of the ferry, if they still exist today would be along the water's edge at the mouth of Indian Creek. Pacific Connector would use a horizontal directional drill to go under the Rogue River, with the entry and exit holes set back far from the river's edge. Therefore, there would not be any project-related impacts on the river banks.

IND363-2 The pipeline does not cross the Rogue River at the mouth of Indian Creek, and therefore, the pipeline crossing is not exactly where the ferry was located. The pipeline crossing would be near the community of Trail. Pacific Connector's cultural resources consultant conducted a pedestrian inventory along the route crossing the Rogue River and no cultural resources were recorded at that location. Any remains of the ferry, if they still exist today would be along the water's edge at the mouth of Indian Creek. Pacific Connector would use a horizontal directional drill to go under the Rogue River, with the entry and exit holes set back far from the river's edge. Therefore, there would not be any project-related impacts on the river banks.

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IND363 Continued, page 2 of 2

L. J. Marks \$249.00

A. Mc Neil \$300.00

They accepted the highest bid, that of A. Mc Neil, and awarded him the contract to build the boat, he posed a bond of \$100.00 (Vol.9.P.115) The ferry was constructed and on the site by September 1891.

John M. Black Ferryman 1891-1895

On August 1891, two bids for operating the County ferry had been Received, one by John M Black "to keep and maintain the ferry for \$25.00 per month for a term of four years. The other by John Mc Daniel, \$25.00 per month, no length of time stated, the court awarded the contract to John M. Black for a term of four years, beginning on the 5 day of September 1891: John M Black to enter into a bond of \$500.00 for the faithful performance of his duties as ferry keeper. (Vol.9.P129) The first salary paid was \$86.00 from sept.18 to Jan.1 1892, and the next \$75.00 in march ,1892 it was paid by regularly by quarters each year, from then to the end of the contract.

Although Mr. Black was 61 years of age, and considerable hearing loss, he carried out his duties as ferryman for the entire term of his contract. His residence was located a mile or so down the river from the ferry, but there was a cabin where he stayed Most of the time . He kept a little dog with him which would bark and alert him when people arrived at the river needing to cross on the ferry .

There was apparently some dispute from time to time , about whether it was safe to operate the to operate the ferry during times of winter high water. The ferryman was under bonds to the county for the safety of the boat as well as its passenger's, and some times when he refused to operate it.

Caroline Drexler Johnson of present day (Shady Cove) remembered one of these times when a doctor needed to cross the river ,and the ferry man thought it wasn't safe , So the doctor went to Frank Johnson's house near by and asked him to run the ferry. Frank did and returned the boat safely to its mooring. Another time Mrs. Johnson said one of the Gordons drank carbolic acid by mistake , thinking it was cough syrup the person who went for the doctor did not wait for the ferry , he swing across the river on the ferry cables , to get help , and made it in time ,for the man lived through it.

To settle the argument about when it safe to operate the ferry , the following was found in the Commissioner's Journal, dated April 6,1892:

"In the matter of the free ferry on Rogue River , near the "Old Nail Ferry Site" the clerk of this Court is ordered to notify A.J. Daily, Harvey Richardson and W.G. Knighten to meet at the ferry on Rogue River, near the old Nail Ferry site on the 15 day of April ,1892 at 2:00 O'clock P.M. and set a stake on each side of the river to indicate the highest level of water in said river above which it would be dangerous to run the ferry boat across river"

This ruling probably settled the Question of when it was safe to operate the ferry.1984 by Marguerite Black - 1910-2007

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IND364

IND364 **Natalie DeNault et al., MoveOn.org**

Attr: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission

IND364-1 The FERC has made no decisions regarding the approval or denial of this project.

Attached are 1,383 signatures and original comments from citizens in Oregon—and across the country—who are concerned about the draft environmental impact statement on the Pacific Connector gas pipeline.

The following individuals affirmed this statement and added their own comments:

"The Pacific Connector gas pipeline and its terminal would become the largest emitter of greenhouse gases in Oregon and would devastate public natural resources, like clean water, pristine old-growth forests, sensitive wildlife habitat, and world-class recreation sites. Yet the Federal Energy Regulatory Commission (FERC) stands ready to approve this project, without taking a hard look at the environmental impacts. Sign now and we will submit your comments to FERC by the February 13 deadline and share your concerns with elected officials charged with safeguarding our precious natural resources."

IND364-1

Thank you for taking the time to read and consider these public comments.

Sincerely,

Natalie DeNault

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IND365

IND365 Annice O. Black, Ashland, OR

IND365-1 Comment noted.

IND365-2 Comment noted.

Annice O Black, Ashland, OR.

Oppose granting a certificate of rite-of-Way to Pacific Connector Pipeline.

I oppose the granting of a right-of-way for any LNG pipe line. Across the ecosystem of the Western Cascades of Southern Oregon. The disruption of cutting a 90 ft wide swath across 210 miles of mountain, forest rivers and stream, creates a kind of scar, never to be repaired. Since no decommissioning plan is in place. The Pacific Connector Pipe line will need maintenance of the pipe line, and an overwhelming amount of mitigation, and land swaps. If the profitability of this pipe line endeavor is might not be enough to cover the cost of construction, the cost of Maintenance or mitigation or the land swaps. The ecosystem will be scared in perpetuity. A cost that is not worth the few decades of use this pipe line my provide.

IND365-1

Reading the Draft Environmental Statement for the Pacific connector Pipe line. Is an emotionally exhausting endeavor. One has to admire the detail for explaining the mitigation for disruption for miles and miles. 210 miles of landscape. The kinds of sacrifices I and my family have made to live in a place where there are such limitation, self imposed. On our life style to preserve and protect, the ecosystem. The amount of time energy and concern for the future of our ecosystem. Is gut wrenching to read of the kind of disruptions this pipe line would do. We have a long memory of trees planed 150years ago by our pioneer ancestor. We look at the longevity of our ecosystem in centuries, not decades. Please respect the Natural environmental area of Southern Oregon and don't grant this pipe line a rite-of-way.

Yes there have been other right of way, that has bisected this part of Southern Oregon.. And the landowners, the Federal and State forest and Industrial timber reaped a benefit. The construction of the interstate highway system cut a radical swath. Over the past 50 years that river of asphalt and cement has brought a economic benefit. For some it never overcame the increase in noise, next to there historic home. The delivery of Electricity across a swath of a right-of-Way bringing lows cost electricity to our rural homes. And sending it across state lines to other customers. The rail road write of way, which now sits mostly unused.; as Rail Traffic has been re routed. Little or no rail cars leave the Rogue alley by rail. And we have to cross the mountains to Klamath Falls to take a passenger train. Those Write of way were at cost of forest, river, wetlands, pastures. But brought a local benefit. Low cost electric and transportation connectivity.

The write of way requested for the Pacific Connector Pipe line. It's accompanist pump stations, and communication towers. Is destined to deliver Natural Gas to a terminal designed to export it. The local southern Oregonians do not benefit from lower natural gas prices. The jobs to run the pipe line are approximate 10 the pump station operators, and 5 (EI) Environmental inspectors. Who will monitor the pipe line. Not what would be considered a benefit to Roseberg, Medford., with the monitoring facility located in Eugene.

IND365-2

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IND365 **Continued, page 2 of 2**

Our Southern Oregon has an amazing legacy from the failure of a right-of-way granted by the government in 1866, called the Oregon and California Railway lands. The federal government took the land out of local control and removed it from the local tax base. Currently 50 percent of Jackson county land is federally owned. So our local economy knows what the consequences of a failed right-of-way project. Consequently the Local O&Co counties have received revenue and sustainable timber. This covenant of maintain a forest in perpetuity, use it at the rate it regrows.

As a citizen of the State of Oregon and a 10th generation American. I hope the reject the project.

agencies will consider need and public benefit within the context of each agency's respective authorities. Each Cooperating Agency will document its decision in the applicable permit, approval, concurrence or determination."pg x of Appendix O LSR Late Sussessional Reserve Technical Report v1.0 15 May 2014

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IND366

IND366 Olena Black, Ashland, OR

IND366-1 Comment noted.

Olena Black, Ashland, OR.
I oppose the Pacific connector Pipe line. due to pipeline constructions standards that are failing, and exploding. In the past 3 months 5 LNG pipe lines have ruptured. in NC, KT, NC, SD.
The Pacific Connector Pipe line is required to build to the current Pipe line standards. and those standard of construction are in question by resent failures.

IND366-1

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IND367

Ron Steffens, Bandon, OR.

I write in opposition to the approval of this project, both the LNG export facility and the Pacific Connector.

IND367-1

The plans for both fail to adequately address the impacts that can be expected during the life of this proposed project that will occur due to sea-level rise based on best available science. The recent executive order calling for a review of flood plain designations based on sea-level rise has not been adequately achieved in this DEIS.

IND367-2

Additionally, the location of the project will be a hazard for the current air routes, which are key to the economic stability and safety of the region. In particular, the airport will be a key resource if/when a major Cascading earthquake occurs. The proximity of a potentially explosive plant so close to populated areas and this key emergency transit resource is an unacceptable risk.

IND367-3

With climate change impacts including drought, the Pacific Connector will add stress onto streams and watersheds already stressed, with additional stressors expected. Also with expanded drought, wildfire hazards will increase in the coast range, and the the Pacific Connector will create "dry" fine-fuel corridors throughout the range, thus increasing the chance of multiple ignitions and catastrophic fire, which would severely impact the timber revenue and watershed stability that the region relies on.

This project should not be approved. Thanks for your consideration.

IND367 Ron Steffens, Bandon, OR

IND367-1 Comment noted.

IND367-2 Sea level rise is discussed in section 4.2 of the EIS. Sea level is dependent on numerous factors and sea level is actually predicted to decrease along some areas of the Oregon coast. Flood plain designations and such review are under the jurisdiction of the COE.

IND367-3 Comment noted.

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IND368

Jenny Council, Roseburg, OR.
LIMITED JOBS, JOB LOSSES & JOBS FOR MEN
Jobs across the fracking fields, digging the pipeline routes, transporting, laying, welding and inspecting pipes, through to the jobs building and maintaining the terminal and crewing the ships, these are all traditional male jobs, and no attempt is being made in this project to change that. There is nothing built into the project that would train or apprentice women into high paying manual trade and construction jobs. As such, the project can easily be predicted to provide jobs for just one class of citizen to the exclusion of another. The federal government should not permit projects that benefit one class of citizen over another protected class. This is discrimination. While there may be jobs for women in ancillary or support roles, the project will do nothing but reinforce the economic gender pay gap. Mitigation should have been included in the project to actively bring women into these well paying jobs.

IND368-1

It was abundantly clear at the public meetings that the specialized pipeline and terminal construction jobs have already been promised, and promised to out of area union members. All the jobs created are traditionally male jobs, and all of the trades people who spoke at the meetings were men.

A number of those out-of-area union men showed up at the public meetings to speak for their jobs. Comments by these men were peppered with clear references to "when" THEY work on this project. Clearly they understand the jobs to already be promised. If jobs are already promised to individuals or specific union chapters, that means local people will not see the new job openings they have been promised if the project starts. There should have been better analysis of how many local people would really be employed by this project, and how much of the salaries earned by out of area workers would benefit the local area.

IND368-2

ECONOMIC LOSSES

It was heart breaking to hear these men stand up to argue that landowners, (who have invested lives, work and savings to generate local cultural and economic value) should be the losers for the benefit to their own personal pockets. Especially with the knowledge that these workers will likely earn in one month more than most landowners will receive for their lifetime out of this project. (ref Salary.com avg Pipefitter salary)

It is the family farms, ranches, enterprises and nonprofits that bring the real wealth & vitality to our rural communities, and this project undermines, undercuts and in many instances even destroys this value. Not all rural production activities can be carried out with a pipeline buried 2 feet below the surface, especially where trees cannot be grown. The ability to conduct Organic farming, an industry in keeping with Oregon values and the needs of our environment, is precluded by the project's need to keep the right of way clear through the perpetual used of herbicides.

IND368-3

IND368 Jenny Council, Roseburg, OR

- IND368-1 Estimates of local and non-local workers, as well as economic benefits to the communities in the area, are provided in section 4.9.
- IND368-2 Estimates of local and non-local workers, as well as economic benefits to the communities in the area, are provided in section 4.9.
- IND368-3 Any use of herbicides, as stated in section 4.5.5.2, would comply with all applicable state and federal standards and would only be used with landowner approval.

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Those losses, whether economic, community or cultural were not adequately evaluated by this DEIS.

CHEMICAL TRESSPASS

The DEIS does not specify what herbicides will be sprayed or how often, or what measures will be put in place to prevent drift, accidental spraying of crops, accidental spraying of humans, or accidental spraying of livestock and pets, or impact on ecosystems and wildlife of constant chemical assault.

It is not specified how or when people on the pipeline route will be notified of spraying schedules or spray chemicals. It is not specified that humans should even be given access to information on spray chemicals, nor that doctors, veterinarians or medical personal have access to information on chemicals used if they are faced with treating cases of chemical poisoning that arise from application errors. (ref: Ceder Valley, OR, Oct 2014, Humans & Animals sickened by arial herbicide spray)

IND368-3
Confid

It is not specified how farms along the pipeline route can either become or maintain certified Organic status with perpetual herbiciding of the pipeline route. The economic, human and environmental impact of destroying or preventing Organic crop, livestock or timber production was not analyzed.

IND368-4

Without naming the chemicals, frequency or protocol for spraying, or the nature of public access to spraying plans or records, the impact on health and wellbeing of all living things along the pipeline route is not open for analysis. All impacts of perpetual herbicide use on the pipeline route should have been analyzed in the DEIS.

NET JOBS

The count of jobs removed from economy through reduction of productive farm & forest land, the lost opportunities for organic farms, the losses to tourism etc were not fully calculated.

IND368-5

The 145 permanent jobs pales when compared that with jobs created by just 1 highschool or 1 small nonprofit agency serving the community; projects that provide jobs to all classes of citizen and provide real public benefit to the communities they serve.

The industrialization of Coos Bay and the north spit will reduce its draw as a tourist destination and will impact leisure, dining and other service industries in the area. I cannot be the only one who would drive straight through Coos Bay to another destination if it were industrialized in this way.

Since boosting the local economy has been a core argument for "public necessity" there should have been a more balanced analysis of jobs lost against jobs gained.

IND368-6

OREGON WOMEN'S LAND TRUST

IND368 Continued, page 2 of 3

IND368-4 Any use of herbicides, as stated in section 4.5.5.2, would comply with all applicable state and federal standards and would only be used with landowner approval.

IND368-5 Socioeconomic impacts are evaluated in section 4.9.

IND368-6 Comment noted.

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Separate comments have been submitted by OWLT but I will reemphasize some impacts to OWLTs work. The Trust is committed to Organic methods of production. This will be destroyed by perpetual aerial spray of herbicides. The Trust is committed to providing a safe environment for women. This will be undermined as jobs along the pipeline route are all traditionally male jobs, women are not being trained into them and we cannot screen workers as safe to have on our land. An alternative route should have been considered that doesn't destroy KOAC or the wetland.

IND368-7

IND368 **Continued, page 3 of 3**

IND368-7 See Chapter 3 for the analysis of alternatives. The analysis does consider route variations to avoid spotted owl habitat. The pipeline is routed in upland areas where feasible.

20150213-0034 FERC PDF (Unofficial) 02/13/2015

ORIGINAL IND369

IND369 Renée Coté, Wolf Creek, OR

Renée Côté
508 Brimstone Rd., Sunny Valley (Wolf Creek), OR 97497
Ph.: 541-955-4636 - email: reneecote8@gmail.com

IND369-1 Comment noted.

February 11, 2015

Kimberly Bose, Secretary,
FERC,
888 First St. NE, Room 1A,
Washington DC 20426.

RE: Docket Numbers CP13-483 and CP13-492.
Opposed to projects

I sent my comment on the eComment system Feb. 11, 2015, got the email receipt but I am not certain both docket numbers were registered. "Your comments have been added to the record for CP13-483-000, et al. " I understand "et al" but because CP13-492 is not specifically named, I am sending the same comment in this letter.

I am strongly OPPOSED to the LNG Pipeline and the Jordan Cove Terminal. ABSOLUTELY AGAINST BOTH PROJECTS.

IND369-1

I am part of the Oregon Women's Land Trust. This pipeline will destroy our land and it will be impossible to fulfill our mission.

For what? Greed.

About Jobs: most politicians have been repeating that these projects will give jobs to Oregonians. NOT TRUE. Possibly a few temporary jobs to Oregonians, mostly jobs to non-Oregonians. I have attended Hearings in Southern Oregon and it is clearly documented.

Veresen is a Canadian corporation which will benefit and make profits. Not the Oregonians. IT IS NOT IN OUR INTEREST.

Environment

In a time of fast climate change, we all need to work together and solve the problems rural areas, cities and countries are facing: inundations, extreme temperature, too hot, too cold, etc.

Both the terminal and the pipeline are potential disasters: earthquakes, explosions, water pollution, destruction of old forests, fish and animals will lose their natural habitat, and the list is long.

THIS IS DESTRUCTION WHEN WE NEED RESTORATION.

I urge FERC to DENY the application for both the Terminal and the Pipeline.

Thank you.
Renée Côté
Renée Côté

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FEB 13 2015

20150213-0035 FERC PDF (Unofficial) 02/13/2015

IND370
ORIGINAL

IND370 Marianne Moskowitz, Wolf Creek, OR

IND370-1 Comment noted.

FILED
SECTION OF THE
FEDERAL ENERGY REGULATORY COMMISSION

2015 FEB 13 P 2:01

Marianne Moskowitz

508 Brimstone Rd., Sunny Valley (Wolf Creek), OR 97497

541-955-4636 cell: 541-218-8216 email: mariannemoskowitz@gmail

February 12, 2015

Kimberly Bose, Secretary,
FERC,
888 First St. NE, Room 1A,
Washington DC 20426.

RE: Docket Numbers CP13-483 and CP13-492.
Opposed to projects

I am **strongly opposed** to the construction of the **LNG pipeline** and the **Jordan Cove Terminal** for the following reasons:

IND370-1

- **Personal:** As part of the Oregon Women's Land Trust, using our land would destroy our natural environment and property (and that of many other land owners in the pipeline's path). Taking the land as 'Eminent Domain' for the profit of a Canadian Company (Veresen of Canada), to export a product to another continent appears to be against all that is reasonable!
- **Environment:** Clearcutting a 100'+ wide strip of land through public forests, including wildlife reserves and streams; building a huge processing terminal on unstable sand dunes; and then shipping the product (originally obtained through 'fracking', another inherently damaging process) half-way around the world, would harm our environment immeasurably (for the profit of a foreign company?).
- **Hazards:** Earthquakes and subsequent tsunamis are a possibility in our area, and we are inundated with warnings and concerns. The pipeline, as well as the terminal, would be at risk, and there could be disastrous consequences if the area were to experience an earthquake. In addition, water pollution and possible explosions could affect any of us living in rural Oregon (for the profit of a foreign company?).
- **Jobs:** While jobs are needed, construction of pipeline and terminal would mostly be temporary, and would hardly change our economic outlook in rural Oregon. Most of the work for the building and construction of such a project would be hired out to workers and companies outside of the area and will not benefit the local population.

I THEREFORE STRONGLY URGE FERC TO DENY THE APPLICATION FOR THE PIPELINE AND THE JORDAN COVE TERMINAL.

IND371

COMMENTS of Wim de Vriend
Jordan Cove LNG Export Terminal – Docket # CP13-483-000
Draft Environmental Impact Statement
February 12, 2015

A. Comments on Executive Summary:

Page ES-4, second paragraph, final sentence: "We were unable to identify any other alternative port location on the Pacific Coast of the United States for an LNG terminal that could meet the objectives of the Jordan Cove project and that would have significant environmental advantages over Coos Bay."

No evidence is presented to support this conclusion, thus raising a number of questions.

First, has FERC forgotten about the proposed LNG terminal in Warrenton, on the lower Columbia River? It is much closer to existing pipelines, and being partway up the river would be less vulnerable than Jordan Cove to the tsunami, soon to come rolling in from the ocean. **I request that, at a minimum, FERC compare the potential environmental impacts of both these location, including the earthquake/tsunami risks.**

IND371-1

Second, why are no locations in the state of Washington being considered? The answer may well be that nobody up there wanted an LNG terminal, but this has not been acknowledged. For instance, the port of Grays Harbor is geographically very similar to Coos Bay, and has been trying to attract new industries as Coos Bay has. **I request that the EIS includes considerations of such alternative locations.**

IND371-2

Third, it's hard to understand why these considerations of alternatives are limited to "the Pacific Coast of the United States" when Jordan Cove's goal all along has been to export mainly Canadian gas. The political argument that filled Jordan Cove's sails, arguing that exporting American gas to the Ukraine would counter Russian aggression there, always was ludicrous. First, we're talking about Canadian gas. Second, the Ukraine is located on the Black Sea. If anyone ships LNG there, it will be countries closer to that market such as Algeria, Qatar and perhaps Norway.

Fourth, do the "significant environmental advantages" apparently used as a yardstick for these comparisons include Coos Bay's extreme exposure to the gigantic earthquake and tsunami that are virtually certain to strike the Jordan Cove facility during its lifetime? Assuming they do, then Canadian ports should be given more consideration, on grounds of greater safety for the American public. I realize FERC has no authority in Canada, but it seems logical to take planned LNG terminals in B.C. into account, since several have been proposed up there. **I ask that these considerations be applied.**

IND371-3

Fifth, why have the unpublished and perhaps unrecorded considerations of alternatives to Jordan Cove not included the offshore mooring of an FLSO, or Floating Liquefaction Storage and Offloading vessel? FLSOs are a recent, viable development in LNG technology that would avoid 90% of the permitting and safety problems associated with

IND371 Wim de Vriend

IND371-1 There is no terminal at Warrenton. Although the proposed Bradwood Landing project did receive a FERC Certificate, it was not able to meet all permitting requirements. The project went bankrupt in 2010.

IND371-2 FERC has not received an application for a terminal in Washington. If it does, that proposal would be analyzed in a separate NEPA document, just as the Oregon LNG Project is being analyzed.

IND371-3 All major Pacific Coast ports are subject to earthquakes and tsunamis. Seismic hazards for the proposed terminal are discussed in section 4.2.1.3 of the EIS. The possible LNG export sites in Canada are discussed in our alternatives analysis in chapter 3 of the EIS, however, the FERC does not regulate projects in Canada.

20150213-5264 FERC PDF (Unofficial) 2/13/2015 3:55:33 PM

Page 2

on-land liquefaction and storage for export. Also, while it is not FERCs responsibility to consider an applicants likely success in business, even at several hundred million dollars apiece, FLSOs are far less financially risky than land-based terminals costing billions, which cannot be moved to alternative locations when the market changes. The same applies to FLSOs' predecessors, FSRUs (Floating Storage and Regasification Units), which can replace land-based LNG import terminals. See: <http://accelerateenergy.com/floating-liquefaction-flng> http://en.wikipedia.org/wiki/Klaip%C4%97da_LNG_FSRU

Again, even though FERCs concerns do not include an applicants financial well-being, it seems pertinent to note that the history of LNG import terminals in the United States bears out the huge financial risks posed by land-based LNG terminals. Of the four LNG import terminals that were built in the US since 1970, only the one in Boston has been regularly used. The ones in Maryland and Georgia sat empty for twenty years. When construction was finished on the Cheniere import terminal in Louisiana, in 2009, it was useless because the import market had collapsed. Its conversion to export, currently underway, may or may not save the company, which so far only has lost money. As one investor in Cheniere put it: "... this is one tiger whose tail I wish I'd never grabbed." See: <http://wofstreet.com/2014/08/05/stock-hype-on-a-wing-and-a-prayer/>

I respectfully request that among the alternatives to Jordan Cove's Coos Bay site, FLSOs be included.

NO. 11

Page ES-4, third paragraph, second sentence: "A smaller slip would be impracticable given Jordan Cove's multi-user concept, which would include enough space for three berths, including ... a potential future west side berth for other commercial ships." Then this proviso is added: "assuming the ... Port ... follows through on its plans to provide for large deep-draft container ships."

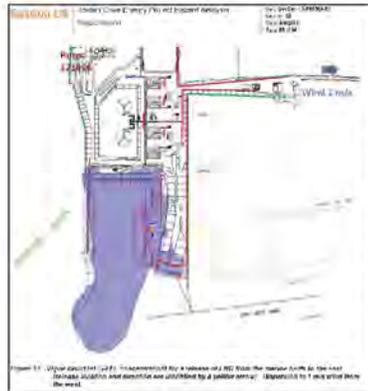
The EIS, on pages 3-14 and 3-15, adds no further information to this worryingly vague statement. This is strange, since (as the EIS does note) Jordan Cove's moorage slip was proposed in order to avoid the chance of passing commercial vessels colliding with a moored LNG carrier, probably in response to a rule formulated by the LNG industry itself that these tankers should not be moored in the outside curve of a navigation channel. To then leave open the possibility that at some future date a second large vessel might be moored in the slip seems irresponsible and incomprehensible. Not only will the extra room for a (most likely mythical) large cargo vessel affect the dredging and construction of the moorage slip but, should such vessels turn out not to be mythical, the safety of the entire LNG transfer operation and its procedures will be seriously affected.

At the same time, I see no mention that the vapor barrier that Jordan Cove proposes to build on all the landward sides of the slip including the western berth will preclude practical use of the moorage on that side of the slip. (I notice that in the graph of a projected vapor cloud release, the cloud that has left the slip is spreading over the bay in a

IND371 Continued, page 2 of 8

IND371-4 FERC is not considering this option. See Resource Report 10 filed with Jordan Cove's FERC application on May 21, 2013.

southwesterly direction. This seems odd because (also according to the graph) the wind is westerly. In reality the winds here are from the northwest in summer and from the southwest in winter.)



More important perhaps (assuming the vapor barrier were removed) is that the potential presence of a second large vessel in the slip should change all the EIS's considerations of the dangers posed by the expected tsunami to a moored LNG tanker. It's one thing to claim that, with 30 to 50 foot waves loaded with debris and running every which way, three tugboats can successfully control a "tethered" LNG tanker, a matter to which I will return. But it becomes even more improbable when another freighter is also moving wildly in the slip, very possibly crushing the tugboats in the process. We are dealing with some very risky business, and to

treat this as a "perhaps-maybe-possibly-who-knows?" item strikes me as neglectful – to say the least.

I request that you either address the inclusion of the second large berth as a fact, and update the EIS to take account of the presence of a second large vessel, or else eliminate it entirely from consideration, modifying the design of the slip accordingly.

Despite possible protestations from the Port of Coos Bay, eliminating the western ship berth is unlikely to do any harm. The Port's hopes for such a development are almost surely vain. The reasons are twofold:

1. Page ES-4 mentioned "large deep-draft container ships" as possible occupants of the western berth. It did so without providing further details. But any container terminal I've ever seen has room for more than one vessel, which this berth obviously would not have. This by itself may doom the idea, but it may help to know that in the recent past, the Port of Coos Bay has flirted with two ideas for a new cargo terminal, a container ship terminal as well as a so-called "general purpose, state-of-the-art cargo terminal". Since in today's shipping environment, "state-of-the-art cargo terminal" usually means containers, they may have been talking about the same thing unless they were thinking of a bulk shipping terminal; it may not be possible to find out. Regardless, the fact is that the increasing concentration of shipping in just a few high-volume ports has largely been driven by

IND371 Continued, page 3 of 8

IND371-5 The Project no longer includes a multi-user slip. The Coast Guard has determined that the entire 800-foot slip would be needed for the safe operation of the LNG operation. The FEIS has been modified to reflect this change.

IND371-5

containerization, which requires vast, expensive port facilities with deep water and excellent inland transportation connections. This is why in the Northwestern U.S., the only place that does a sizable volume of container business is Seattle/Tacoma, on Puget Sound. The Port of Portland, although Coos Bay has always considered Portland a frightfully competitive shipping behemoth, has only ever handled a few percentage points of the West Coast container volume. On that basis alone, expecting Coos Bay to develop a real container terminal is completely unrealistic.

It is true that the idea of a Coos Bay container import terminal was raised in 2007, by the Maersk shipping company. But despite all the excitement it generated, there were enough circumstances suggesting that instead of a serious proposal, it was part of a corporate game of playing three ports against each other, with Coos Bay an unlikely winner against its competitors, which were a harbor in Baja California and one in British Columbia. For one thing, the Coos Bay harbor would have to be greatly deepened, and for another, the railroad would have to be completely rebuilt, because the incoming containers' final destination would not have been Coos Bay but a distribution center east of the Rockies, and hauling them on a 10-mile an hour, single-track railroad would not have been acceptable. Not much later the sharp recession slowed the container business, and instead of building a new terminal anywhere Maersk leased vacant dock space in Vancouver, B.C. Other developments since, including the slowdown of the global economy and the enlargement of the Panama canal, make a resurrection of the container terminal idea for Coos Bay even more unlikely.

2. The idea of the second berth in the slip appears to be an ill-thought-out revival of a notion first advanced two years before Maersk's short-lived container spiel. In 2005, the Port of Coos Bay was approached by Jordan Cove about building an LNG IMPORT terminal, to take advantage of the spread between overseas and domestic gas prices, which then was the opposite of today's. The Port Manager at the time saw this as an opportunity to build a "state-of-the-art" cargo terminal, since he'd been under the gun from business interests and the ILWU to build such a thing, at public expense. In his scheme it would be part of the same moorage slip that would be used by the LNG tankers, using lease and docking revenues paid by Jordan Cove to build it and subsidize its losses, which were virtually certain. But this idea, while it may be still alive, never made economic sense. And the Port knew it, since in 2002 and 2003 they had paid for two studies on the very same topic: whether to build a publicly-financed "state-of-the-art" cargo terminal. Both studies had concluded that it would never pay, due partly to a lack of cargo, and partly due to competition from larger ports like Portland, which already had underused shipping docks. Looking at the bigger picture, these conclusions accord with the worldwide trend in shipping that has seen it concentrated in the biggest harbors, with small ones like Coos Bay falling into disuse as others have done before it.

The two cargo dock studies, which the Port should still have, were:
"Evaluation of Marine Cargo Opportunities for the Port of Coos Bay, Oregon", April 2002: BST Associates, Bethell, WA, and,
"Feasibility analysis for a Modern Marine Cargo Facility in the Port of Coos Bay, Oregon". PB Ports and Marine, Inc., May 2003.

IND371 Continued, page 5 of 8

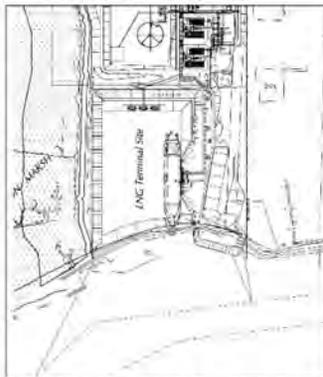
IND371-6 Comment noted.

B. Comments on Draft EIS, which says on page 4-249, about the Tsunami risk: "There are two tsunami scenarios to address. The first scenario would be a distant earthquake event in Alaska or Japan . . . The second scenario involves a large earthquake capable of generating a tsunami from the nearby CSZ. It is calculated that it would take 25 minutes for a large tsunami generated from the CSZ to reach Coos Bay after the earthquake event occurs, which would provide time for LNG vessels to disconnect from the berth and to reconnect with the tug boats. **The tethered LNG vessel and the three tug boats would hold their position under power to offset the advancing wave and currents. The tsunami wave is predicted to impact the bow of the ship head on. If the LNG vessel is traversing the channel during the tsunami, the tugs would also provide assistance as described above.**" (emphasis added)

To begin with, all the estimates I have seen of the timing of the tsunami set it at either 15 or 20 minutes after the quake, an estimate more likely than 25 since "The damage would be most severe in areas closest to the rupture, such as Coos Bay . . ."

http://www.oregonlive.com/business/index.ssf/2014/06/coos_bay_lng_terminal_designed.html.

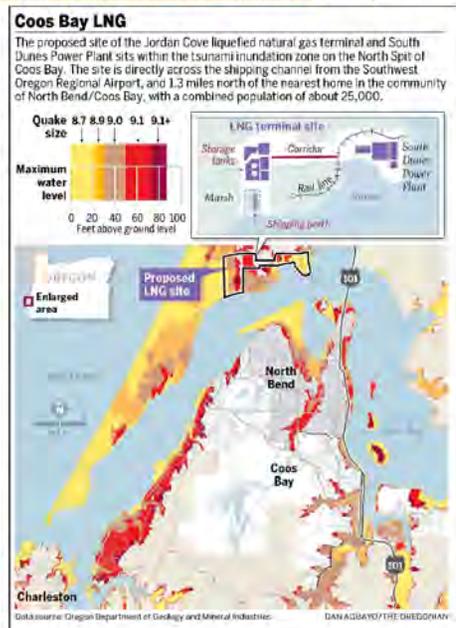
Be that as it may, my main request to FERC's navigation experts is to get their heads out of the clouds. The crews of the tugboats assisting the LNG tankers will be very aware of the quake and tsunami forecasts. So when the 9.1 or 9.2 quake hits, the real questions to ask are: Where are they, and what will they do? If they are accompanying a tanker transiting the bay, they will probably stay on board and try to get it out to the ocean where the tsunami won't do any harm, difficult as that may be with an incoming tanker that first has to turn around. But if they are in or near the moorage slip, will they run off to secure the safety of their families, which is an entirely understandable human urge – or will they rise above all that and report for a duty which is now likely to become a suicide mission? I would not bet money on them choosing the former. Besides, there are legal precedents. Emergency services, like fire departments, in case of major disasters allow their employees to secure the home front first, so they won't be overly distracted while doing their jobs.



IND371E

With 41 major earthquakes having struck the Oregon/Washington coast during the last 10,000 years, mathematically the interval between quakes is about 244 years. Since we know the most recent one occurred in January 1700, the next one should have come during World War II. That the geologists consider it overdue caused them, a few years ago, to set the probability of it happening during the next fifty years at 37%, and LNG terminals can easily live for fifty years. With the passage of a few years 37% turned into 40%, which in due course will become 50%, and so on.

Nobody knows the future, and nobody knows exactly what Coos Bay will look like after the tsunami. Even the Japanese, very earthquake and tsunami-conscious people, turned out to be poorly prepared for what happened in 2011. This alone is enough to doubt the assertion cited earlier that the tugboats (assuming the crews have stayed on board) will **hold their position under power to offset the advancing wave and currents. The tsunami wave is predicted to impact the bow of the ship head on.** Contrary to the assertions in the EIS, the tsunami will come from two directions, not just towards the tanker's bow. One part will rush through the harbor entrance at Charleston and from there north into the slip; that's the part that the EIS says will just hit the bow. But before it gets there, the other part of the big waves will have rolled east across the beach and almost all of the low-lying North Spit, then running into the bay and into the slip, slamming into the west side of the moored LNG carrier. And this process will be repeated since tsunami waves can continue to come for hours while those that have run furthest inland rush back, carrying massive



amounts of debris, boats, cars, and so on. So the bay and the moorage slip will be cauldrons of competing waves, giving the crews the experience of their lives – if they stay and if they survive. Finally, I'm astonished by this additional **untruth** LIE in the EIS: "... Another commenter stated that the area west of the terminal is low lying and could be swamped by a potential tsunami wave. That statement is incorrect. **The area west of the Jordan Cove terminal is a high dune that provides considerable protection from a direct tsunami wave inundation.** ... Therefore, Jordan Cove's LNG terminal would be protected and should be able to safely handle the design tsunami event.

The fact is, there are no high dunes close to the beach. What high dunes are found in the area are located north and east of the Jordan Cove site, which is no great consolation. Moreover, tsunami maps show all the dunes west of Jordan Cove totally submerged by a 9.0 quake-generated tsunami, and scientists say ours could be 9.1 or 9.2.

My request to FERC is to be realistic, by taking into account both human nature and nature itself, and draw the appropriate conclusion, which is that locating this facility at this location is irresponsible. What may also help is simply to have all the contributors to this EIS watch the videos of the 2011 Japanese tsunami.

Of course Jordan Cove is of a different opinion, which is why the gem below may have been written by the company itself.

It should be noted that although Japan has more LNG terminals than any other industrial nation, none of those facilities were significantly impacted by the 2011 Tohoku earthquake. We conclude that the site-specific tsunami studies, coupled with Jordan Cove's proposed mitigation measures, indicate that the site is not unsuitable due to tsunami hazards."

One of those Japanese LNG facilities was damaged and out of use for about a year. From what I've read it was in a much more sheltered location than Jordan Cove. It is also a fact that two Japanese oil refineries were set on fire, though primarily by the earthquake.

I ask that FERC provide comparative data and maps showing the tsunami experience of any LNG terminals in the Tohoku-tsunami affected area in terms of location, shelter, and elevation.

Finally, I notice that the Coast Guard has confessed to powerlessness regarding the safety of the LNG tankers: "I'm very skeptical that anything can be done in a near-shore tsunami" to protect the tanker," said Randy Clark, a security specialist with the U.S. Coast Guard. "There simply isn't enough time. ... There are no real regulations. There is no requirement to mitigate this risk." (http://www.oregonlive.com/business/index.ssf/2014/06/coos_bay_lng_terminal_designer_d.html)

Basically, there IS no contingency plan expect resignation to disaster: **"We believe the hazards attending the operations at the Jordan Cove export facility could have the potential to rise, as a result of cascading events, to catastrophic levels that could cause the**

IND371 Continued, page 7 of 8

IND371-7 Comment noted. Also note that while the earthquake and tsunami caused widespread damage to energy facilities, none of the LNG tanks was damaged in the 2011 Japanese tsunami.

IND371-8 The DEIS does note that no LNG tanks were damaged in the Japanese tsunami; however, our analysis is based on studies specific to Coos Bay. An analysis of LNG facilities in Japan is beyond the scope of this EIS.

IND371-F

IND371-E

near total and possibly total loss of the facility, including any LNG ships berthed there," their comment said. "Such an event could present serious hazards to the public well beyond the facility boundaries."
http://www.oregonlive.com/business/index.ssf/2015/01/scientists_say_public_safety_hh.html#incart_related_stories

And no wonder. The channel is dredged to 37 feet. A loaded LNG tanker draws about that much or more, which will enable it to move through the bay only at high tide. Even assuming that is the case, if the quake hits in transit the vessel may not be able to reach the open ocean in time, or it may be grounded by the customary lowering of the water level just prior to the tsunami. Large ships, including LNG carriers, especially loaded ones, are not built to take that kind of abuse.

Then there is this. The U.S. Congress has identified LNG terminals as potential terrorist targets, which is why everything I've read about LNG carrier arrivals and departures includes a description of the measures to keep everything else away, as in this description of an LNG entering Boston harbor:

"Every time a tanker . . . enters Boston Harbor, everything stops. Traffic on the Tobin Bridge. Planes in and out of Logan International.

That's not all.

To guard against a terrorist attack, each tanker is escorted by two Coast Guard patrol boats with mounted machine guns, a 110-foot cutter, a helicopter, six tugboats, a fireboat, police cruisers. State police divers check piers for bombs, while sharpshooters stand guard on rooftops. And all other ships must stay at least a mile away."

BUT... at the Coos Bay FERC public meeting on Dec 8, 2015, Coast Guard Captain of the Port Dan Travers stated the following:

"There have been some inaccurate reports and letters in the press which indicate the Coast Guard intends to shut recreational and commercial use of Coos Bay down during an LNG tanker transit. **We have no intention to close the waterway during LNG shipments.**" (Emphasis added)

For shippers, for fishermen both commercial and recreational, for clam diggers and others, it's very important to know what the exact safety procedures for incoming, moored and outgoing LNG tankers will be. After all, an estimate of 80 ships a year means 160 trips up or down the bay, almost one every other day. **I ask that you publish the exact procedures, including the size and duration of the safety zones.**

Thank you for your attention to these matters.

IND371 Continued, page 8 of 8

IND371-9 The exact procedures are not determined by FERC. The Coast Guard will determine what safety measures will be required. Section 4.13.6 discusses LNG vessel hazards and Coast Guard regulatory oversight. Section 4.8 discusses potential delays for commercial and recreational boaters.

IND371-9

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IND372

IND372 Olena Black, Ashland, OR

IND372-1 Comment noted.

Olena Black, Ashland, OR.
I oppose the granting of a right-of-way for any LNG pipe line. After reviewing the DEIS for the Pacific Connector Pipeline. I have concluded that the risk of Landslides is a reason that this pipe line should not be granted. The extensive mitigation, and the re-routing explained in the DEIS indicates that the applicant is aware of the risks of landslide. Also the easements not yet studied due to and because private property owners will not grant permission to access the property. The route of the pipe line may not be feasible if the extent of slides can only be determined after Emanate Domain is enacted to get access to those properties, only to find that the land is unstable, prone to landslide, or will become so because of the trenching along the ridges. The mountains of Southern Oregon, the Cascades, are steep and unstable, routing a 210 mile high pressure LNG pipe line into remote and inaccessible mountainous area, where a landslide would explode the pipe line on breach, is a risk too high. I oppose the granting of a right-of-way for any LNG pipe line, cross the ecosystem of the Western Cascades of Southern Oregon.

IND372-1

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IND373

johanna harman, Talent, OR.
Deny approval for this project, the Pacific Connector Fracked gas pipeline and Jordan Cove LNG export facility. □
The potential harms far outweigh the benefits and were not adequately considered by the FERC DEIS. □□

IND373-1

IND373-2

My comments address fracking. □

The purpose of this project is to increase extreme extraction fracking.□
Fracking has dangerous impacts to groundwater and leaks significant amounts of methane, a powerful greenhouse gas, during extraction and transport.□□
Fracking harms are not being adequately considered by FERC. □
Reports and studies documenting harm related to fracking are growing. □
Fracking bans, locally and globally are also growing.□
Resources for this are too bountiful to list. □
The harms caused by fracking are central concerns not adequately addressed by the DEIS.□□

IND373-3

Groundwater□
The DEIS must prove groundwater sources in fracking zones are not being harmed. □
Thanks to the 'Halliburton Loophole' introduced into the 2005 Energy Plan by Dick Cheney, fracking companies are exempt from environmental regulations - thus are permitted to insert carcinogenic chemicals into the ground in their extraction process."
□Regardless of this loophole fracking has dangerous impacts to groundwater and the public must be protected.
The DEIS must prove groundwater is protected. □□

Air, Water and Soil□
There are numerous other concerns about air, water, and soil impacted by fracking that are not being addressed by FERC/in the DEIS and must be. □
Regarding the recent NY ban on fracking, "The potential adverse impacts of fracking are "widespread," said DEC Commissioner Joseph Martens. Prospects for fracking in New York are "uncertain at best," and the economic benefits are "far lower than originally forecasted."□
("Compendium of scientific, medical and media findings demonstrating risks and harms of Fracking," by Concerned Health Professionals of NY," Dec 11, 2014
<http://concernedhealthny.org/wp-content/uploads/2014/07/CHPNY-Fracking-Compendium.pdf>)

□□□Climate Impacts of fracking□
We know that the earth is warming and that human emissions of greenhouse gases are the primary cause. This debate is over, according to the best available science.
□□"Why Climate Deniers Have No Scientific Credibility - In One Pie Chart"
<http://www.desmogblog.com/2012/11/15/why-climate-deniers-have-no-credibility-science-one-pie-chart>□□
We are facing catastrophe and must act. □

IND373 Johanna Harman, Talent, OR

IND373-1 Comment noted.

IND373-2 The assessment found in the EIS complies with the requirements of NEAP, and FERC believes that it adequately analyses the potential impacts. This comment does not provide specific items or issues that were not fully or adequately analyzed in the document.

IND373-3 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

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IND373 Continued, page 2 of 3

"Severe...pervasive... irreversible: IPCC'S Devastating Climate Change Conclusions"
<http://www.commondreams.org/news/2014/08/27/severe-pervasive-irreversible-ipccs-devastating-climate-change-conclusions>
Scientists are grieving our refusal to process this information and act accordingly. □

"I don't know of a single scientist that's not having an emotional reaction to what is being lost." [Professor Camille Parmesan, climate researcher,] said in the National Wildlife Federation's 2012 report."
<http://www.truth-out.org/news/item/28702-mourning-our-planet-climate-scientists-share-their-grieving-process>
Methane from natural fracked gas is far more destructive than previously thought.

THE FERC DEIS does not reflect the latest best available science re: the global warming potential of methane. □

IND373-4

□"The latest IPCC report determined "methane is 34 times stronger a heat-trapping gas than CO2 over a 100-year time scale, so its global-warming potential (GWP) is 34. That is a nearly 40% increase from the IPCC's previous estimate of 25...the EPA has been using a GWP of 21 for its estimate of how methane compares to carbon dioxide - a figure that is nearly twenty years out of date."

<http://thinkprogress.org/climate/2013/10/02/2708911/fracking-ipcc-methane/>

Bridge fuel

□Extreme extraction fracking has backing from the Obama administration and many Oregon representatives because they believe, "If extracted safely, it's the bridge fuel that can power our economy with less of the carbon pollution that causes climate change," according to President Obama at the State of the Union address. But the best available peer-reviewed science now says methane may be more damaging than coal.

<http://grist.org/climate-energy/bad-news-for-obama-fracking-may-be-worse-than-burning-coal/>

The leaking cannot be fixed adequately. It's a fallacy to make this promise.

"It is not a bridge fuel, there's too much leakage."

<http://www.desmogblog.com/2014/04/16/study-find-marcellus-drilling-methane-leaks-1-000-times-epa-estimates-casting-doubt-bridge-fuel-notion>
"The report clearly cautions against shale gas because of concerns with regards to fugitive emissions."

<http://www.carbonbrief.org/blog/2014/04/what-does-the-ipcc-report-say-about-shale-gas/>

There's just too much risk in this gamble.

The Intergovernmental Panel on Climate Change (IPCC, 11-1-14 report) determined that by 2050 we must have reduced our reliance on fossil fuels by over 80%. □The Jordan Cove terminal will have decades of life left by 2050. □

IND373-5

You have not considered if this massive fossil fuel project would fit into that reduction.

This project could tip us over into unlivable climate change. □□

Cumulative Impacts □

IND373-4 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.

IND373-5 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.

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The Draft Environmental Impact Statement (DEIS) failed to address the cumulative impacts of fracking and must. Please provide evidence of this analysis in your DEIS. □
NEPA requires cumulative impacts be addressed. □
Delaware Riverkeeper v. FERC, 2014 ruled a continuous pipeline project cannot be segmented into multiple parts to avoid a comprehensive National Environmental Policy Act (NEPA) review. □ Similarly FERC must provide a comprehensive review of this project in relation to the other fracking projects being approving and failed to do so.

IND373-6

□□□□ Due to long term and in many cases permanent impacts to people, our environment and the climate this project is clearly not in the public interest.
It's a gift to and from the gas industry.
□ It would be incredibly irresponsible to green-light this project.
It's impossible to mitigate the harms.
Please deny this certificate.

Thx!

IND373 Continued, page 3 of 3

IND373-6 The cumulative effects of this project in conjunction with other past, present, and reasonably foreseeable projects are addressed in section 4.14 of the DEIS.

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IND374

IND374 Susan Aufderheide, Ashland, OR

susan aufderheide, ashland, OR.
hello
this is a bad idea for everyone except for a few investors. here are a couple of reasons why:

this for-profit pipeline built for resource export is not a National priority for energy security and MUST NOT be built using Eminent Domain for property acquisition violating the basic requirements of eminent domain. natural gas is necessary to power the cryogenic facility releasing large quantities of CO2 creating a major source of carbon in the US violating state and national goals for emissions reduction. potential catastrophic risk to the coos bay area cannot ever be fully mitigated due to the location of the facility near flightpaths to and from a regional airport.

IND374-1

oregon must make more than a symbolic statement against US & world over-dependence on fossil fuels. it is time to fully employ technologies that are available and mature enough to create a sustainable energy future! let's get off the petroleum tit once and for all while we still have some beauty left for our grandkids and those that follow them. otherwise, we become the stupidest group of humans ever to populate planet earth.

u, ferc, can make a difference...we, the citizens challenge u to stand up for our inherent rights. thank u.

gratitude is magic
suzia aufderheide
souixzan@mind.net

IND374-1 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. The Commission would make its decision on public benefit in its Project Order. The Commission would issue its Order after we have produced an FEIS.

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IND375

IND375 Jeff Harms, Springfield, OR

Jeff Harms, Springfield, OR.

As an Oregonian, I ask that you approve Jordan Cove and Pacific Connector. These two projects will create more than 2,000 construction jobs over four years and 200 permanent family wage jobs at the facility in Coos County when completed. This will be an incredible economic boost to the South Oregon Coast.

The Southern Oregon counties crossed by the pipeline will also benefit by having a new source of natural gas available for residential, commercial or industrial use. Over the long-term, this will make Oregon as a whole a more competitive place to do business.

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1

A. Statement of Historical Procedural Facts¹

Originally, Respondent, Pacific Connector Gas Pipeline L.P. (“PCGP”) proposed to build a 234-mile, 36-inch diameter, high pressure pipeline (“Pipeline”) from an import terminal at Coos Bay to Malin, Oregon to distribute imported natural gas in its gaseous state to markets inside the United States. Within Coos County, the 49.72-mile segment of the Pipeline would cross land zoned: Forest (39.47 miles); Exclusive Farm (3.72 miles); Rural Residential (.47 miles); Industrial (.07 miles); and, 14 different Coos Bay Estuary Management Plan (“CBEMP”) zoning districts (5.99 miles). LUBA Rec 160. The Pipeline through the Coos Bay Estuary will require digging a trench 2.5 miles long and eight feet deep through an area subject to daily flooding by the tide. *See*, Petitioners’ Court of Appeals Brief at 19-20 for a more detailed description of the Pipeline construction and cites to the record.

IND376-1

The County approved a Conditional Use Permit for the Pipeline by Final Decision and Order No. 10-08-045PL, dated September 8, 2010 (“2010 Decision”) County Rec 118-285. That decision included the following language:

“25. The conditional use permits approved by this decision shall not be used for the export of liquefied natural gas.” County Rec 276.

¹This statement of facts is substantially the same as the Statement of Material Facts Petitioners submitted in Petitioners’ Brief to the Court of Appeals at 3. Respondent-Intervenor accepted them as true. Answering Brief of PCGP at 2.

IND376-1 Comment noted. Text in the EIS supports this statement with discussion of trenching through Haynes Inlet in section 4.4.

The 2010 Decision was based, in large part, on the Federal Energy Regulatory Commission (“FERC”) issuance of a “*Certificate of Public Convenience and Necessity*” for import only, dated December 17, 2009. County Rec 123, 240 (“FERC Import Certificate”). The FERC Import Certificate, issued pursuant to Section 7c of the Natural Gas Act, 15 U.S.C. §§ 717–717z, authorized PCGP to construct, install, own, operate, and maintain an interstate natural gas pipeline for the purpose of transporting and distributing natural gas from the Jordan Cove LNG terminal at Coos Bay to natural gas markets throughout the region. County Rec 123.

The 2010 decision was appealed to LUBA, which remanded the case in March 2011. *Citizens Against LNG, Inc. v. Coos County*, 63 LUBA 162 (2011) County Rec 293 to 360. On remand, the County reapproved the Pipeline with the original Condition 25 included. County Rec 291.

On April 16, 2012, FERC vacated the FERC Import Certificate. County Rec 800. In 2013, Respondent PCGP applied to the county to delete or modify Condition 25 to remove the prohibition of the use of the pipeline for the purpose of exporting LNG. County Rec 831. A hearing officer held a hearing on the application and recommended to the Board of Commissioners that Condition 25 be modified to read as follows:

“25. The conditional use permits approved by this decision shall be used

for the transportation of natural gas.” LUBA Rec 255, County Rec 37.

The Coos County Board of Commissioners adopted the hearing officer’s findings and conclusions. County Rec 5.

An appeal to LUBA followed. LUBA Rec 1. LUBA affirmed the County decision. LUBA Rec 5 to 16. An appeal to the Oregon Court of Appeals followed. The Court of Appeals affirmed the LUBA decision without Opinion. This appeal follows.

B. Legal Questions Presented and Proposed Rule of Law

Question 1. When an issue is mooted by a fact and thus the issue is not raised in the appeal of a land use permit, does a subsequent change in facts which gives rise to a request to modify the earlier land use permit allow the issue to be raised?

Petitioners on review propose the following rule of law: An issue that was previously mooted may be the subject of appeal where the facts have changed.

Question 2. Is a legal issue that is thoroughly addressed by the decision maker at the first level of a case, in this case by the County, preserved when the issue is raised at subsequent levels of appeal?

Petitioners on review propose the following rule of law: Procedural fairness underlies the requirement of preservation and where an issue is

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thoroughly addressed by the decision maker at the first level of a case, even if arguably not raised by the parties, then the issue may be raised on appeal.

Question 3. Should LUBA be required to apply the plain meaning of an administrative rule to the facts or be allowed to substitute its policy judgment about what an administrative rule means?

Petitioners on review propose the following rule of law: When the text of an administrative rule is capable of one meaning, no weight can be given to the rule's history.

C. Importance Beyond this Case of the Questions Presented

Many Oregonians are affected by the decision in the case. The proposed project has generated many articles in the statewide press. See APP 1 to 8. The consequence of the decision is important to the public, even if the issues may not arise often.

The County decided this case based on its erroneous view that the County had no authority over a federally licensed LNG pipeline project. LUBA 179. The Hearing Officer Recommendation to the County Commissioner stated the Natural Gas Act ("NGA") preempts County standards. County Record page 69 and 277-279. Petitioners fully briefed this issue to LUBA, explaining that the federal Coastal Zone Management Act is not subject to the NGA. LUBA 166, 167. While the NGA, 15 U.S.C. §§ 717–717z, establishes a "comprehensive

scheme of federal regulation” that vests FERC with “exclusive jurisdiction over the transportation of natural gas in interstate commerce for resale,” *Dominion Transmission, Inc. v. Summers*, 723 F.3d 238, 240 (D.C. Cir. 2013) quoting *Schneidewind v. ANR Pipeline Co.*, 485 U.S. 293, 300–01, 108 S.Ct. 1145, 99 L.Ed.2d 316 (1988); this preemptive power is power limited by three statutory exceptions² that specifically provide “nothing in this chapter affects the rights of States under (1) the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.)” 15 U.S.C. Section 717b(d).

Since most of the land in Coos County is subject to Coastal Zone Management Act (“CZMA”), County Record 278, Oregon has the responsibility under the CZMA to ensure that the values of coastal zones are protected. See APP. 9 and 10 for list of values of the coastal zone. This responsibility may not be deferred or delegated to a Federal agency. In *Aes Sparrows Point LNG, LLC v. Smith*, 527 F.3d 120, 123 (4th Cir. 2008) the 4th Circuit described these requirements: CZMA requires that any federal agency activity affecting the state's coastal zone “be carried out in a manner which is consistent to the maximum extent practicable with the enforceable policies of

IND376-2

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IND376-2 Comment noted.

² The preemptive power of the NGA is limited, however, by three statutory exceptions, specifically, 15 U.S.C. § 717b(d), states that the NGA does not “affect the rights of states under: (1) the Coastal Zone Management Act of 1972 (16 U.S.C. § 1451 et seq.); (2) the Clean Air Act (42 U.S.C. § 7401 et seq. or (3) the Federal Water Pollution Control Act (33 U.S.C. § 1251 et seq.)” 15 U.S.C. § 717b(d). *Dominion Transmission, Inc. v. Town of Myersville Town Council* (D. Md., 2013).

approved [Coastal Management Plans]. 16 U.S.C. § 1456(c)(1).” *Id.* at 123. The Coos County Zoning and Land Use Ordinance, which includes the Coos Bay Estuary Management Plan is part of the federally recognized Oregon Coastal Management Plan. ORS 196.425, ORS 196.465 (2013).

LUBA did not address this issue. The Oregon Supreme Court is urged to use this opportunity to assert the authority of Oregon to apply Oregon’s land use laws, especially in the Coastal Zone.

First Question Presented: When an issue is mooted by a fact and thus the issue is not raised in the first appeal of a land use permit, does a subsequent change in facts which gives rise to a request to modify the earlier land use permit allow the issue to be raised?

Petitioners on review propose the following rule of law: An issue that was previously mooted may be the subject of appeal where the facts have changed and the issue is no longer moot.

This case presents a significant issue of law concerning labeling an argument a “collateral attack” and then on that basis, dismissing a challenge to a land use proceeding concerning a parcel of land and permit that was the subject of an earlier appeal. Here, LUBA ruled that Petitioners’ argument that the Coos Bay Estuary Management Plan (“CBEMP”) requires a demonstration of a “substantial public benefit” failed because it was an collateral attack on the

2010 decision, citing *Butte Conservancy v. City of Gresham*, 47 LUBA 282, 296 aff'd 195 Or. App. 763, 100 P3d 218 (2004) LUBA Rec 10.

When facts that meet an approval criteria change, it is not a collateral attack on the prior decision to require that the approval criteria be met under the new facts. Here the CBEMP states:

CBEMP Policy #5 Estuarine Fill and Removal

I. Local government shall support dredge and/or fill only if such activities are allowed in the respective management unit, and:

b. A need (*i.e.*, a substantial public benefit) is demonstrated and the use or alteration does not unreasonably interfere with public trust rights;

II. **Other uses and activities which could alter the estuary** shall only be allowed if the requirements in (b), (c), and (d) [above] are met. (Emphasis added).

While LUBA discussed how the Pipeline was “incidental dredging” and an approved use, the Pipeline still does not meet the approval criteria of demonstrating a substantial public benefit required for a use that could alter estuary.

IND376-3

The “substantial public benefit” issue was moot in 2010 because Respondent PCGP demonstrated “a substantial public benefit” with its FERC *Certificate of Public Convenience and Necessity*. The proposed change to Condition #25 to allow the Pipeline to be used for export fails to meet the

IND376 Continued, page 10 of 18

IND376-3 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS.

approval criteria of demonstrating a “a substantial public benefit” required by the Coos Bay Estuary Management Plan. CBEMP Policy 5 II (b).

The Supreme Court is urged to review this case to affirm earlier decisions of LUBA, cases that were not reviewed by the Oregon Supreme Court, that found new facts require a new analysis of the law to the facts. Earlier LUBA cases are at odds with the result in this case. In *Setniker v. Polk County*, 63 Or LUBA 38 (2011). (LUBA found that an issue had not been waived on remand where the issue of whether the county could rely on signalization could not have been raised in the initial appeal. *Id.* In *Welch v. Yamhill County*, 58 Or LUBA 29 (2008) Petitioners did not waive their right to argue that Ballot Measure 49 precluded a second subdivision approval decision by failing to make that argument in their appeal of an earlier subdivision decision that predated Ballot Measure 49. *Id.* The subject of that earlier appeal was the county’s pre-Ballot Measure 49 subdivision approval decision, not the county’s post-Ballot Measure 49 subdivision approval decision. *Id.* Similarly, in *Winkler v. City of Cottage Grove*, 33 Or LUBA 543 (1997), a local government’s decision (following remand from LUBA) that a modified site plan complies with conditions of approval that were imposed by its initial decision that led to the first LUBA appeal raises new issues that petitioners may challenge in a subsequent LUBA appeal challenging the local decision on remand. *Id.*

These issues were fully developed and preserved below. During the 2010 case, the County accepted PCGP's argument that the CBEMP requirement that "a substantial public benefit" be demonstrated had been satisfied by the issuance of the FERC Import Certificate. County Record 240. At all levels, opponents of the project and Petitioners argued the County had failed to make a finding of "a substantial public benefit" required by CBEMP Policy 5, County Rec. 10, 716, 736, LUBA Rec. 172, Petitioners' Court of Appeals Brief at 10.

LUBA failed to examine the important issue raised in this case concerning when to dismiss a claim because it a "collateral attack," especially when new facts that directly impact an approval criteria change, as they have here. LUBA was persuaded that the requirement to find "a substantial public benefit" by CBEMP Policy 5 II (b) was irrelevant since "no ground disturbing activity of any kind is proposed beyond the ground disturbing activity that was authorized in the 2010 decision." LUBA Rec. 10, LUBA failed to address the loss of FERC Import Certificate which met the approval criteria in the 2010 Decision for a Pipeline limited to import use. No facts demonstrate "a substantial public benefit" for an export Pipeline. The Supreme court is urged to examine this issue on the merits.

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Second Question Presented: Is a legal issue that is thoroughly addressed by the decision maker at the first level of a case preserved when the issue is raised at subsequent levels of appeal?

Petitioners on review propose the following rule of law: Procedural fairness underlies the requirement of preservation and where an issue is thoroughly addressed by the decision maker at the first level of a case, even if arguably not raised by the parties, then the issue may be raised at subsequent levels of appeal.

This case presents a significant issue of law concerning Oregon's preservation jurisprudence. Here LUBA ruled that Petitioners' second assignment of error failed because petitioners did not "demonstrate that the issue * * * * was preserved during the proceedings below." LUBA Rec. 13. What LUBA and the Court of Appeals fail to appreciate is the fact the issue of the interpretation of OAR 660-006-0025(4)(q) (hereafter: the Forest Zone Rule") arose when the County issued its decision. The County fully developed an argument using ten pages to discuss the issue of the proper interpretation of the Forest Zone Rule. Petitioners' first opportunity to argue the issue and contest the ruling was when we appealed to LUBA. Petitioners informed LUBA and the Court of Appeals that this issue arose when the County issued its decision. LUBA Rec. 181, Court of Appeals Brief at 27. Nonetheless, LUBA

found the issue was not preserved, and the Court of Appeals affirmed.

Oregon's jurisprudence regarding the requirement of preservation of issues was summarized in *Peeples v. Lampert*, 191 P.3d 637, 345 Or. 209 (Or. 2008). The purpose of preservation is judicial efficiency³, fairness to opposing parties⁴ and full development of the record⁵. The foundation of "[w]hat is required can vary depending on the nature of the claim or argument; the touchstone in that regard, ultimately, is procedural fairness to the parties and to the trial court." *Id.* at 220.

The court recognized in *Peeples*, that in some circumstances preservation is not required. *Id.* An example is when an issue first arises when a court issued its order, citing *McCarthy v. Oregon Freeze Dry, Inc.*, 327 Or. 84, 95 n. 6, 957 P.2d 1200, *modified on recons.*, 327 Or. 185, 957 P.2d 1200 (1998). In that case, the aggrieved party was not required to take action to preserve an objection to the lack of special findings below, because the lack of special findings only arose when the Court of Appeals issued its order. The *Peeples* court also cited

³ Judicial efficiency: parties must give trial court opportunity to avoid error. *Peeples, supra*, at 219, quoting *Shields v. Campbell*, 277 Or. 71, 77, 559 P.2d 1275 (1977).

⁴ Fairness to an opposing party: permits opposing party to respond, parties are not taken by surprise, misled, or denied opportunities to meet an argument. *Peeples, supra* at 219, quoting, *Davis v. O'Brien*, 320 Or. 729, 737-38, 891 P.2d 1307 (1995).

⁵ Full development of the record: aids the trial court in making a decision and the appellate court in reviewing it. *Peeples, supra* at 220, referencing *Outdoor Media Dimensions Inc. v. State of Oregon*, 331 Or. 634, 659-60, 20 P.3d 180 (2001).

State v. DeCamp, 158 Or.App. 238, 241, 973 P.2d 922 (1999) as another example of when preservation can be a practical impossibility. In that case, the sentencing Judge changed a defendant's sentence when the defendant was not present and without notifying the defendant to allow him to be present. *Peeples, supra* at 220, n. 7.

The Supreme Court is urged to grant review so fairness is not denied in this case and to establish in land use cases that preservation is not required when it is impossible to preserve an issue.

Third Question Presented: Should LUBA be required to apply the plain meaning of an administrative rule to the facts or be allowed to substitute its judgment about what an administrative rule means?

Petitioners on review propose the following rule of law: When the text of an administrative rule is capable of one meaning, no weight can be given to the rule's history.

This case specifically presents the interpretation of an administrative rule. Oregon Administrative Rule OAR 660-006-0025(4)(q), which states:

(4) The following uses may be allowed on forest lands

* * * *

(q) New electric transmission lines with right of way widths of up to 100 feet as specified in ORS 772.210. New distribution lines,(e.g., gas,

oil, geothermal, telephone, fiber optic cable) with rights-of-way 50 feet or less in width; . . . *Id.*

Petitioners argued at LUBA and at the Court of Appeals that the language of the Forest Zone rule is unambiguous. LUBA Rec. 182, Petitioners' Court of Appeals Brief at 34. LUBA ruled that the rule's history "does not reflect an intent on the part of LCDC to prohibit lines that could be, under some circumstances, characterized as transmission lines." LUBA Rec. 15. In other words, LUBA made a policy decision, contrary to the rule that it does not matter what kind of line it is, it will be allowed. Under *State v. Gaines*, 346 Or 160, 206 P3d 1042 (Or. 2009), the history of the Forest Zone rule should not be given any weight.

With regard to this changed methodology, we clarify that a party seeking to overcome seemingly plain and unambiguous text with legislative history has a difficult task before it. *Id.* at 173, 206 P3d at 1052.

LUBA should not have substituted its judgment about the rule's meaning where the rule's language is unambiguous.

LUBA disregarded the rule of law to "not to insert what has been omitted, or to omit what has been inserted." ORS 174.010. *PGE v. Bureau of Labor and Industries*, 317 Or. 606, 611, 859 P.2d 1143 (1993). The Supreme Court is urged to allow review to ensure LUBA follows the court's guidelines for statutory interpretation especially when LUBA interprets administrative rules concerning policy. An amicus brief, by 1000 Friends of Oregon, objecting to LUBA substituting its judgment for policy choices made by the Oregon

Department of Land Conservation and Development is available, should the court accept review.

D. Brief Argument Concerning The Legal Questions Presented On Review.

Question 1 Legal Argument

LUBA failed to address the CBEMP requirement that “uses and activities which could alter the estuary shall only be allowed” if the requirement of finding a “need (*i.e.*, a substantial public benefit) is demonstrated and the use or alteration does not unreasonably interfere with public trust rights.” CBEMP Policy 5 II (b) . LUBA found that since “dredging or fill” was allowed in the affected zoning district, then demonstrating “a substantial public benefit” was not required. LUBA failed to apply Policy 5 (II)(b) which applies to all “other uses and activities which could alter the estuary” and requires the demonstration of a substantial public benefit. (Emphasis added)

Question 2 Legal Argument

In the circumstance of this case, Petitioners were taken by surprise when the County ruled that the pipeline was allowed in a Forest zone under OAR 660-006-0025. The foundational principle of fairness includes fairness to the party who is aggrieved by a surprise ruling. Petitioners argued the issue on the merits at LUBA and at the Court of Appeals. LUBA Rec. 183, Petitioners’ Court of Appeals Brief at 29 to 35. In fairness to Petitioners, LUBA and the

Court of Appeals should have recognized and ruled that the Forest Zone issue could not have been preserved and thus the assignment of error raising the issue should not have been dismissed on that basis.

Question 3 Legal Argument

Distribution⁶ means the contents of the pipeline will go to more than one place. See also, Webster's Dictionary. In this case, the record is clear that all the natural gas in the line will go to one place, an export terminal, unlike the previous case where the imported natural gas was to be distributed throughout the region. County Rec. 808. A gas line that does not distribute gas is not allowed in an Oregon Forest zone. OAR 660-006-0025(4)(q). If the court is uncertain about this factual issue, a remand for factual findings on this issue is appropriate.

IND376-4

E. Decision for Review

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⁶ distribution [dɪstrɪˈbjuːʃən]

- the action of sharing something out among a number of recipients: *she had it printed for distribution among her friends.*
 - the way in which something is shared out among a group or spread over an area: *changes undergone by the area have affected the distribution of its wildlife.*
- Microsoft Word Dictionary Service

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IND376-4 OAR 660-006-0025(4)(q) lists facilities that are allowed, it does not include any statement that pipelines without local hookups are not allowed. In any case, it is up to the State to determine consistency with state laws as part of their permitting process.

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IND377

Comments on the FERC DEIS for the Pacific Connector Gas Pipeline Project

1) The Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl, also known as the Northwest Forest Plan (NWFP), is the prevailing legal framework for planned activities on federal lands managed by the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) through which the proposed Pacific Connector Gas Pipeline would cross. These Standards and Guidelines are defined as:

“The rules and limits governing actions, and the principles specifying the environmental conditions or levels to be achieved and maintained.” (USDA and USDI 1994, page F-4)

The standard and guideline for new developments in Late-Successional Reserves (LSRs) states,

“Developments of new facilities that may adversely affect Late-Successional Reserves should not be permitted. New development proposals that address public needs or provide significant public benefits, such as powerlines, pipelines, reservoirs, recreation sites, or other public works projects will be reviewed on a case-by-case basis and may be approved when adverse effects can be minimized and mitigated.” (USDA and USDI 1994, page C-17)

The proposed Pacific Connector Gas Pipeline (PCGP) project is a private enterprise and neither addresses “public needs” nor provides “significant public benefits” as required for review by the BLM and USFS. Therefore, as the proposed PCGP project fails to meet this basic standard, and furthermore will “adversely affect” by clearcutting 408.3 acres of LSR (FERC DEIS Appendix H, p.17), it “should not be permitted” as the standard and guideline clearly states.

IND377-1

2) The objectives for the LSR land allocation of the Roseburg and Coos Bay District’s Resource Management Plans (RMPs) are,

“Protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth forest-related species including the northern spotted owl and marbled murrelet.

“Maintain a functional, interacting, late-successional and old-growth forest ecosystem.” (USDI June 1995, p.29) (USDI May1995, p.18)

The proposed pipeline will cut a wide swath through existing Late-Successional and Old-Growth (LSOG) forests, including 14 occupied MAMU nesting sites, and as such is in direct conflict with existing RMPs.

IND377-2

IND377 Erich Reeder, Medford, OR

IND377-1 The Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision-document. The Commission would issue its Order after we have produced an FEIS. Impacts resulting from clearing of LSR are addressed in appendix H of the DEIS.

IND377-2 Comment noted.

The proposed mitigation for the destruction of existing, irreplaceable, centuries-old native forest is absurdly superficial: reallocate some land from a Matrix designation to an LSR designation, and so with a wave of the wand pretend to make the destruction of LSOG “consistent with the goals of the LSR land allocation to protect and enhance conditions of LSOG forest ecosystems that serve as habitat for LSOG-related species.” (Appendix H, p.84). Plainly, the very real clearcutting of hundreds of acres of existing LSOG forest will absolutely diminish the quantity and quality of LSOG forest ecosystems.

IND377-2
Cont'd

3) The objective in the Roseburg and Coos Bay District’s RMPs for managing Marbled Murrelet (MAMU) habitat, states,

“Protect contiguous existing and recruitment habitat for marbled murrelets (i.e., stands that are capable of becoming marbled murrelet habitat within 25 years) within a 0.5 mile radius of any site where the birds’ behavior indicates occupation.” (USDI June 1995, p.48) (USDI May 1995, p.36)

The construction of the proposed pipeline would destroy 39.3 acres of *occupied* MAMU habitat and indirectly impact 441 additional acres in the Roseburg and Coos Bay BLM Districts (FERC DEIS, Appendix H, Table 2.4-2, p.126). There is no way to reconcile this with the aim and requirements of the District’s RMPs, so the trick is to amend them to allow it,

“The Coos Bay District RMP would be amended to waive the requirements to protect contiguous existing and recruitment habitat for MAMUs within parts of the PCGP right-of-way that is within 0.5 mile of occupied MAMU sites, as mapped by the BLM.” (FERC DEIS, Appendix H, p.28)

“Proposed amendment BLM-1 would waive the requirement to protect all MAMU habitat within occupied stands. A total of 33.9 acres would be cleared within twelve occupied MAMU stands.” (FERC DEIS, Appendix H, p.52)

“The Roseburg District RMP would be amended to waive the requirements to protect contiguous existing and recruitment habitat for MAMUs within parts of the PCGP right-of-way that is within 0.5 mile of occupied MAMU sites, as mapped by the BLM.” (FERC DEIS, Appendix H, p.61)

“The proposed amendment BLM-1 would waive the requirement to protect all MAMU habitat within occupied stands. Approximately 5.5 acres of occupied MAMU stands would be cleared within the Roseburg District. (FERC DEIS, Appendix H, p.83)

This however ignores the BLM's responsibility to act in "compliance with the Endangered Species Act," which clearly states:

"Each Federal agency shall, in consultation with the assistance of the Secretary, insure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species..." (ESA Sec.7.(a)(2))

Surely clearcutting 39.3 acres of occupied MAMU habitat and indirectly affecting 441 additional acres, qualifies as "likely to...result in the destruction or adverse modification of habitat of such species." Therefore the proposed action is in direct conflict with the ESA requirement that Federal agencies "insure any action authorized" do otherwise.

4) Marbled murrelet nesting success often fails due to predation by corvids (Stellar's jays, common ravens, etc.) (Nelson and Hamer 1995). Multiple studies have shown that fragmentation of existing LSOG forests creates edges which increase concentrations of corvids which in turn increases MAMU nest predation by as much as 250% (Malt and Lank 2009). These adverse effects last for many years and extend further than 100 meters into the interior of the fragmented LSOG forest (Burger, et al. 2004). The FERC DEIS inadequately addresses this amplified and long-term risk to MAMU nesting success, simply stating that,

IND377-3

"Potential impacts to nesting birds by predatory corvids attracted to the right-of-way would be addressed by ensuring that all construction contractors practice appropriate and responsible trash disposal every day." (FERC DEIS, p.4-524)

While this is appropriate during the immediate construction phase of the proposed pipeline, it does not, as stated above, sufficiently address the short and long-term adverse effects LSOG forest fragmentation would cause to MAMU nesting success by increasing corvid presence.

Sincerely,

Erich Reeder
41 Eastwood Drive
Medford, Oregon 97504
erichnreeder@gmail.com

Literature cited:

Burger, A.E, et al., *Effects of habitat fragmentation and forest edges on predators of marbled murrelets and other forest birds on southwest Vancouver Island*, (2004).

IND377 Continued, page 3 of 4

IND377-3 Indirect effects to marbled murrelet are discussed in section 4.7.1.2 of the DEIS, with further detail provided in our Biological Assessment, available on the FERC website. The impact assessment including edge effects and nest predation was developed in coordination with FWS.

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IND377 **Continued, page 4 of 4**

4

Malt, Joshua M., and Lank, David B., *Marbled Murrelet nest predation risk in managed forest landscapes: dynamic fragmentation effects at multiple scales*, (2009).

Nelson, S. Kim, Hamer, Thomas E. *Nest Success and the Effects of Predation on Marbled Murrelets*, (1995).

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IND378

IND378 Natalie DeNault et al., MoveOn.org

Attr: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission

Attached are 1,413 signatures and original comments from citizens in Oregon—and across the country—who are concerned about the draft environmental impact statement on the Pacific Connector gas pipeline.

The following individuals affirmed the following statement and added their own comments:

"The Pacific Connector gas pipeline and its terminal would become the largest emitter of greenhouse gases in Oregon and would devastate public natural resources, like clean water, pristine old-growth forests, sensitive wildlife habitat, and world-class recreation sites. Yet the Federal Energy Regulatory Commission (FERC) stands ready to approve this project, without taking a hard look at the environmental impacts. Sign now and we will submit your comments to FERC by the February 13 deadline and share your concerns with elected officials charged with safeguarding our precious natural resources."

IND378-1

IND378-1 The FERC has made no decisions regarding the approval or denial of this project. The project is currently undergoing the NEPA process (through the development of the EIS) which constitutes the "hard look."

Thank you for taking the time to review and consider these public comments.

Sincerely,

Natalie DeNault

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IND378 Continued, page 2 of 136

Tia Factor
Portland, OR 97212
Feb 13, 2015

sandy olken
ashland, OR 97520
Feb 13, 2015

Morningstar
Ashland, OR 97520
Feb 13, 2015

Crystal Roden
Fort Worth, TX 76134
Feb 13, 2015

krista
Ashland, OR 97520
Feb 13, 2015

It's time to drastically curtail our development and use of fossil fuel resources. Now, not later when the planet is ruined beyond repair for many generations if not forever for human beings.

Gail Winterman
Eugene, OR 97405
Feb 13, 2015

Rachael Millican
Portland, OR 97219
Feb 13, 2015

what is bad for the ecosystems is bad for the economy. No exploitation for the profits of foreign corporations. Pipelines are un-American.

nathaniel appling
Grants Pass, OR 97527
Feb 13, 2015

doni diaz
Milford, PA 18337
Feb 13, 2015

The future is not natural gas, please stop this pipeline. This is more in the interest of Canadian energy companies than Oregon.

Kristine Paul
Corvallis, OR 97330
Feb 13, 2015

MoveOn.org

2

Jan
Portland, OR 97211
Feb 13, 2015

Deron Kosoff
Corvallis, OR 97330
Feb 13, 2015

Frank Mauldin
Salem, OR 97302
Feb 13, 2015

Anna Cassilly
Talent, OR 97540
Feb 13, 2015

Laura Ferguson
Ashland, OR 97520
Feb 13, 2015

Marla
Creswell, OR 97426
Feb 13, 2015

Suzanne Frtwell
Ashland, OR 97520
Feb 13, 2015

Gail Hare
Gresham, OR 97080
Feb 13, 2015

EXPORT gas??? That is totally NUTS. The last I heard, the goal was for the US to become energy independent. Obviously the multi national corporations believe supplies of resources are infinite, but the reality is that we should sequester all energy produced within the US, with NONE going to export.

David Wood
Salem, OR 97301
Feb 13, 2015

JOHN MAIER
PORTLAND, OR 97212
Feb 13, 2015

Bryan Dawley
Corvallis, OR 97333
Feb 13, 2015

20150213-5329 PERC PDP (Unofficial) 2/13/2015 4:57:17 PM

Christina Michelle
Ashland, OR 97520
Feb 13, 2015

Brigitte
Ashland, OR 97520
Feb 13, 2015

Anton bokal
Ashland, OR 97520
Feb 13, 2015

Alison H.
portland, OR 97211
Feb 13, 2015

IND378-2
1> This project will contribute to 'climate change'. (If you don't want to reverse this - I'm very disappointed in you!) 2. the fracking appears to be bad for ground water. 3. we can better use these hydrocarbons than for energy. 4. I haven't seen anything about this but I suspect not much effort is being spent on collecting Helium - a resource that will become more important in the future.

Robert Pearson, PhD
Portland, OR 97223
Feb 13, 2015

Chris Damon
Talent, OR 97540
Feb 13, 2015

Tyler Shirek
Salem, OR 97304
Feb 13, 2015

Tony Askins
Williams, OR 97544
Feb 13, 2015

Marilyn Marcus
Eugene, OR 97405
Feb 13, 2015

Regina Southworth
Corvallis, OR 97333
Feb 13, 2015

Keep nature natural!!!!

MoveOn.org

4

IND378 **Continued, page 4 of 136**

IND378-2 Contributions to greenhouse gas emissions are discussed in Section 4.12.1.4 and global warming impacts are discussed in Section 4.14.3.12.

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IND379

To whom it may concern:

This letter concerns the Jordan Cove liquefied natural gas pipeline and liquefaction plant at Coos Bay planned by Veresen Inc. I am writing on behalf of my 2 children, Aidan who is 6 months old and Beatrice who is 3, to request you terminate the Jordan Cove LNG pipeline project. The project is a direct threat to their lives and possibly yours and mine as well. As you know, the increased consumption of natural gas that this project entails will greatly accelerate the rate of global warming. Natural gas is equally damaging to the climate when the methane leak is factored in as compared with CO2 from diesel, and supporting its continued use delays the transition to renewable energy, which is essential to avoid catastrophic climate change. Although it is assumed that the rate of global warming is glacial, there is no reason to assume that it will move this slowly. The rate of global warming may potentially be rapid enough to make the planet unable to support human life within the lifetime of my children, or, if the drought in California and the southwest is any indication, within our lifetimes. The permitting process for the LNG pipeline must address the probable impact of the project on global warming. Global warming, its cause and its relationship to fossil fuel use are all scientifically established facts. Not including an assessment of this issue would be akin to not using math or the concept of gravity in the evaluation process. Including the negative impact represented by the contribution to global warming, the project has a clearly unacceptable cost. In addition to the impact on global warming, the project exports a non-renewable fuel that could be used domestically. Not long ago the country was concerned about strategic insecurity due to our dependence on foreign fossil fuel producers who do not share our national interests. This remains a significant issue, which is another reason this project is a terrible idea. Furthermore, because the plan is to sell fossil fuel overseas at a higher price than can be obtained domestically, it will undoubtedly increase the cost of fossil fuel domestically, which is not in the best interests of the United States. For these and many other reasons, the project should be terminated completely with no further review.

IND379-1

IND379-2

IND379-3

Yours sincerely

Julian Bell MD

880 Glendower St

Ashland Or 97520

503 577 4122

IND379 Julian Bell, Ashland, OR

- IND379-1 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.
- IND379-2 Decisions regarding the energy policy of the nation are outside the scope of the FERC. These decisions (e.g., whether or not to export gas) are the jurisdiction of the U.S. Department of Energy. It is outside the scope of this EIS to assess the overall U.S. energy policy.
- IND379-3 There is no evidence that the Project would result in higher domestic natural gas prices. See response to IND37-4.

20150217-5001 FERC PDF (Unofficial) 2/13/2015 5:03:27 PM

IND380

IND380 Bruce Campbell, Los Angeles, CA

Bruce Campbell, Los Angeles, CA.
To FERC and to whom it may concern:

I call for the selection of the No Action Alternative regarding the Jordan Cove LNG Project and associated Pacific Connector Gas Pipeline. There are a number of significant inadequacies in the Jordan Cove LNG Export proposal - as well as in regards to the route and fragmentation problems associated with the 232-mile PCGP:

1. There was a woefully inadequate "analysis" (if it can even be called that) on Climate Change in the Draft EIS. There should have been a major analysis done on impact of the PCGP route on carbon sequestration over the decades (due to removal of vegetation), plus the sources of the natural gas to be exported needs to be examined in terms of its carbon footprint. The significant methane escape from fracked gas must be accounted for - but instead since the document emphasizes that no one knows how much the proposed Project will impact climate change, they are clearly shirking sensible efforts which would involve estimating the shifts in sequestration of carbon along the PCGP route. But even if impacts on climate due to which sources of gas are being tapped are omitted, it is admitted on pg. 4-1043 that "the Project emissions would contribute to the overall amount of atmospheric GHG, it is impossible to quantify the impacts that the emissions of GHG from construction and operation of the project would have on climate change." The EIR should have tried to quantify both the immediate Project and overall Project (including activities at gas extraction sites as well as relating to the process of liquefaction at the Jordan Cove site) in terms of carbon footprint / GHG gas release / carbon sequestration.

IND380-1

2. Not only is the "fragmentation of habitat" issue along the proposed PCGP not adequately addressed in the DEIS, but Figure 4.1-6. of the DEIS clearly shows that there was a notable effort made to choose a route which dissects and fragments as much of Marbled Murrelet habitat as possible. Due to the increasingly bad shape that the Marbled Murrelet species is in, it would make sense to reject the entire project due to the very disturbing and damaging PCGP route. Also, the impact of the PCGP on each listed or proposed for listing species needs to be carefully analyzed in the Draft as well as the Final EIS, rather than use the lawyer's blanket conclusion that the project abides by all laws. Even the narrower swath around the pipeline is disturbing in terms of fragmentation, but the initial wider swath that would be devegetated to accommodate the pipeline is even more disturbing - including with its likely use of toxic herbicides.

IND380-2

3. There is inadequate support for the declaration that (due to planned mitigation measures), that the Project will not jeopardize the existence of any federally-listed threatened or endangered species. Marbled Murrelet, Northern Spotted Owl, Pacific Fisher, some anadromous fish species, and a fairy shrimp are some of the listed species who are not doing so well, and what they do not need is further fragmentation of their habitat by this unneeded pipeline. (Pg. 4-630 says that "fishers could be present within the area and could be affected by the Project.

- IND380-1 See the response to CO10-3. We are not aware of any quantitative means of capturing the impact of the PCGP route on carbon sequestration due to temporary vegetation removal, and sources are varied and can also not be quantified.
- IND380-2 Federally listed species are managed by the FWS. Surveys and avoidance, minimization and mitigation requirements will be identified in the BO prepared by the FWS following the release of the FEIS. Marbled murrelets are discussed in section 4.7.1.2.

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Potential impacts include disturbance from construction noise, increased risk of collision, habitat removal and modification, habitat fragmentation, and edge effect." Also, most matrix lands are butchered, so they will not do much for species habitat even over the mid-term.

4. I disagree with the vague assertion that the Project would not have a significantly adverse impact on enviro resources within the watersheds crossed by the POGP route.

5. There is significant underestimation of the massive impact that the Cascadia Subduction Zone (which is considered to be the fault which could deliver the highest magnitude quake of any in the Lower 48 States) can deliver - with massive impacts on the Project. Eight foot offset is certainly not a maximum offset that such seismic zone can deliver, and don't try to confuse us by saying the recurring quake is in thousands of years when many believe that there are recurring greater than 9.0 quakes every 300 years or so on the CSZ (and we are fifteen years overdue).

IND380-3

6. The liquefaction potential from a major quake at the Jordan Cove project site is a lot more significant than admitted. Let us look at the setting (quote from page 4-242): "The LNG terminal site is underlain by loose to dense fill and a relatively clean fine grained sand which is in turn underlain by weathered sandstone. Fill depths are typically 10 to 15 feet at the Ingram Yard and up to 25 feet at the mill site." (Also, recall the plans to add dredgings to make certain parts of the Jordan Cove project site more elevated.)

IND380-4

7. The document takes a rosy-eyed view of the alleged non-toxic nature of dredge spoils in the Coos Bay area. Seeing that the Weyerhaeuser facility is in the area, and seeing that the timber industry is widely known for using many toxic products such as pentachlorophenol, creosote, and dioxin contaminants from related chlorine bleaching processes, plus heavy metals.

8. It is clearly inadequate to only contend with trying to stop the spread of Port Orford Cedar root rot by taking steps if equipment is moved onto US Forest Service land - seek to prevent the transfer of this root rot to neighboring watersheds no matter who manages or owns the land.

IND380-5

9. The document does pretty well on pages 4-639 and 4-640 in explaining why the POGP would be an added factor leading toward further decline in the Northern Spotted Owl species. There is not adequate mitigation to make up for the bad impacts that would occur in NSO nesting, habitat, and dispersal areas.

10. It is a ploy to applaud the fact that southern Oregon will use a certain amount of the proposed gas - even though the mass majority of it is for export. FERC's Certificate of Public Convenience and Necessity is a joke.

IND380-6

IND380 Continued, page 2 of 2

IND380-3 See response to comment IND1-4 and IND73-16.

IND380-4 Section 4.2.1.3 of the EIS includes a detailed evaluation of soil liquefaction hazard at the LNG terminal site. Soil liquefaction was not considered a concern at this site based on evaluation of soils and an engineering seismic analysis. In addition, engineering design - including ground improvement - would be performed to mitigation risk as appropriate.

IND380-5 Nowhere in the EIS does it indicate that the spread of this root rot would only be treated on federally managed lands. The LNG facility is entirely located on private lands, and measures are proposed to minimize its spread during construction of the project on this private lands. Regarding the pipeline (which crossed both federal and private lands), the EIS says this: "Port-Orford-cedar root disease - The BLM and Forest Service conducted a risk assessment to determine if there was a need for the Project to implement additional management practices to control P. laterals, and determined that no special mitigation is required along the pipeline's right-of-way or haul routes (see appendix R). However, Pacific Connector has proposed additional measures as part of their Plan of Development. To minimize or prevent the spread of P. laterals along the pipeline, Pacific Connector would implement the following in areas with Port-Orford-cedar, whether stands are infested or not (adapted from BLM 1994a): (1) pressure wash equipment and vehicles prior to entering uninfested areas and prior to departure of infested areas; (2) limit ground-disturbing construction and maintenance activities to the dry season, if feasible; and (3) prevent use of right-of-way in Port-Orford-cedar areas from off-road recreationists by blocking access. Pacific Connector would revegetate Port-Orford-cedar areas using disease-resistant strains of seedlings." These commitments by the applicant are not land management specific.

IND380-6 Comment noted.

20150217-5004 FERC PDF (Unofficial) 2/13/2015 5:12:56 PM

IND381

Richard Harrington, Butte Falls, OR.
Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Comments on Draft EIS
Pacific Connector Gas Pipeline
Docket Number CP13-492-000

1. The proposed Pacific Connector Pipeline would transport Canadian sourced natural gas from Malin to Coos Bay for export to Asia. Construction of this pipeline would require the exercise of eminent domain by a private foreign entity for non-public commercial purposes. The 5th Amendment to the US Constitution reads in part: "nor shall private property be taken for public use, without just compensation." How the proposed action qualifies as "public use" must be explained in convincing detail.

IND381-1

Subject pipeline might also be utilized to transport domestically produced natural gas for export to Asia. A significant portion of domestic production is derived from oil and gas leases of federal lands. Selling of this public resource to Asian countries would amount to 'private use', since the US does not receive fair compensation for the gas produced from such leases, nor is this publicly-owned gas being produced for the benefit of the US public that owns it. In other ways it is also not in the best interests of the US.

IND381-2

A finite publicly owned resource is being sold off for short-term private gain to the detriment of long term energy supply security. Furthermore, export of this resource will harm our economy in two important ways: first, it will lead to higher natural gas prices for domestic consumers by reducing supply in the short-, mid-, and long-term. Secondly, to the detriment of our own manufacturing sector jobs, it will fuel Asian industrial economies that are now constrained by energy supply and air pollution issues. Transporting domestically produced natural gas for export by a foreign for-profit entity does not constitute "public use".

IND381-3

2. The regulations governing the pipeline construction in rural areas allows the use of thinner-walled pipe than what is required in more densely populated areas, and at the same time allows siting of the pipe in very close proximity to rural residences, such that in the event of a pipeline breach there is a high probability of loss of life. The mere fact that thicker-walled pipe is required in more populated areas is an admission that there is, in fact, some probability of pipeline failure. Rural residents' safety will be sacrificed in order to save on pipe cost and reduced (shortest-path) construction cost. Engineering based on economic considerations must not outweigh maximum safety considerations. All human life must be treated equally and with dignity.

IND381-4

IND381 Richard Harrington, Butte Falls, OR

- IND381-1 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. The Commission would make its decision on public benefit in its Project Order. The Commission would issue its Order after we have produced an FEIS.
- IND381-2 Comment noted. FERC does not determine compensation for the gas produced from federal leases. This issue is beyond the scope of this EIS.
- IND381-3 Comment noted. Socioeconomic impacts are assessed in section 4.9. Global economic impacts are outside the scope of this EIS. The U.S. Department of Energy regulates U.S. energy policy, not FERC.
- IND381-4 The DOT, not FERC, regulates pipeline safety, they determine whether the gas should be odorized, not FERC. The DEIS discloses the DOT requirements.

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IND381 Continued, page 2 of 2

3. The amount of eminent domain compensation would be based upon the fair-market value of only the strip of land taken. The DEIS ignores the devaluation of the remainder of a property when put up for future sale, a net loss for the property owners. The very fact that the majority of potentially impacted landowners oppose the construction of the pipeline is undeniable evidence that, if given the choice, typical humans will choose not to live in a visually degraded environment, not to have their privacy compromised, and not to live in close proximity to the danger posed by a 36-inch, 1400 lb psi natural gas pipeline. Real estate disclosure law requires sellers to disclose the existence of such underground pipeline works to potential buyers. Because the pool of prospective buyers will shrink as a result of such disclosure, the normal supply/demand forces will be tilted in the direction of less demand, resulting in lower potential real estate sale prices. The proposed minimal eminent domain compensation is not commensurate with the proposed takings.

IND381-5

Thank you for taking these comments into consideration,

Richard Harrington
PO Box 192
Butte Falls, OR 97522

IND381-5 Impacts to landowners, including potential effects on property values and the use of eminent domain, are discussed in Section 4.9. Eminent domain is covered by existing laws. FERC has no authority to revise these laws.

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IND382

Tonia Moro, Medford, OR.

I am opposed to this project and believe the DEIS does not satisfy the requirements of NEPA. Although I am not at this time able to decide if I would like to challenge FERC's decision in court, after all such decision would be uninformed at this point, I do not want to give up an opportunity to do that so, please accept this correspondence as my motion to intervene.

Regarding the specifics of how the DEIS is not lawful, I join the comments submitted by Ron Sadler. As he sets forth the DEIS "is a gross violation of the letter, spirit, and intent of the National Environmental Policy Act." Because the DEIS is inadequate, FERC should prepare and circulate a revised DEIS.

In addition to Mr. Sadler's specific comments which I paraphrase below, I argue the DEIS does not satisfy the policy of NEPA as stated in section 4331(b)(1), which declares a federal duty to "fulfill the responsibilities of each generation as trustee of the environment for succeeding generations." The National Gas Act does not supercede this duty or it would have exempted FERC from NEPA which it has not.

The DEIS wholly fails to satisfy this duty and the other stated explicit requirements because it provides nothing but a biased and self-serving description of the purpose and need as it was provided by the applicant. This is born out by its failure to consider any alternatives.

The existing broader public and succeeding generations of this Country do not have an interest in this project much less a need for it. And, FERC may not say otherwise without discussing the project in the context of the larger energy market and the impacts of the perpetuation of the burning of fossil fuels. This project will do nothing but add green-house-gases to our atmosphere through consumption of the gas and the energy necessary to get it to their Asian markets and it will undoubtedly result in the leakage of methane which is even more damaging.

We should be investing in renewable energy infrastructure and that is why many of us here in the Rogue Valley are working very hard every day to speed up the transition to cleaner energy. Each dollar invested in renewable energy technologies also brings living wage jobs to our construction industry.

Please also accept, as my own, the following complaints about the DEIS as quoted or paraphrased from draft comments authored by Mr. Sadler:

Comment No. 1 - The DEIS has not been objectively prepared and is slanted to rationalize and justify a decision that has already been made, the approval of the Project, in violation of 40 CFR 1502.5. FERC has not prepared an EIS that could "inform the decisionmaking process in a timely manner." Instead, the DEIS "assesses the potential environmental effects of the construction and operation of the ... PROJECT", thereby making the project a pre-conceived decision. At this preliminary stage it is error for FERC staff to already conclude "that the approval of the Jordan Cove Project would result in some limited adverse environmental impacts,"and that these impacts could be mitigated by measures recommended in the DEIS.

IND382-1

IND382-2

IND382-3

IND382-4

IND382-5

IND382 Tonia Moro, Medford, OR

- IND382-1 The assessment found in the EIS complies with the requirements of NEAP, and FERC believes that it adequately analyses the potential impacts. This comment does not provide specific items or issues that were not fully or adequately analyzed in the document.
- IND382-2 FERC is fully complying with NEPA.
- IND382-3 Alternatives are considered in Chapter 3. See the introduction to that chapter for an explanation of how FERC considers alternatives.
- IND382-4 Contributions to greenhouse gas emissions are discussed in section 4.12.1.4 and global warming impacts are discussed in section 4.14.3.12.
- IND382-5 The EIS is a science-based document which relies on extensive research and studies and includes input from cooperating agencies, state agencies, and the public. The analysis meets the intent of NEPA. It analyzed the environmental effects of the project. The Commission will use the FEIS and other analyzed in determining whether to approve the project and what conditions it will include in its Public Order.

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Comment No. 2 - The DEIS has not been prepared as a tool to facilitate objective analysis, but is clearly intended to serve as a full disclosure document focused on the proposed action itself in direct violation of 40 CFR 1502.1.

Comment No. 3 - The statement of purpose and need in the DEIS violates both NEPA regulations and EPA guidance and is inadequate to serve as the starting point for a valid EIS.

The DEIS states that "the purpose and need for the proposed Project...was defined by Jordan Cove". In summary, the project is being proposed by Jordan Cove in order to serve "robust international demand for natural gas" by exporting "competitively priced natural gas from western Canadian and Rocky Mountain sources". This is an invalid starting point and orientation for the preparation of the DEIS. FERC has clearly ignored the NEPA regulations and the EPA input from the EPA because the DEIS is based on the biased, and self-serving description of the purpose and need as provided by the applicant. Moreover, the law requires FERC not to put forward a purpose and need statement that is so narrow that it defines competing reasonable alternatives out of existence. That is what has happened here.

IND382-6

Comment No. 4 - The section of the DEIS relating to the Alternative Ways to Meet the Need violates Section 1502.14 of the NEPA regulations as well as EPA guidelines. Its conclusion that there are no reasonable alternatives to the Jordan Cove project is not properly supported. This is the heart of the process and the DEIS wholly fails to explore and objectively evaluate all reasonable alternatives. It fails to devote the same level of analysis to all alternatives including the proposed action so that reviewers may evaluate their comparative merits. And the range of reasonable alternatives should include those not within the jurisdiction of the lead agency, which, of course is not considered. Here, despite the fact that FERC is not the project proposer, it still must still consider all reasonable alternatives including those that are practical or feasible from the technical and economic standpoint. Instead of considering the capacity of other terminals, the DEIS merely adopts the applicant's view that a West Coast terminal is necessary.

Comment No. 5 - The DEIS violates 40 CFR 1502.15 and ignores the recommendations of the Environmental Protection Agency because it does not describe the current condition of the Affected Environment from the Jordan Cove DEIS.

Comment No. 6 - Because the DEIS does not providing for an objective and analytical comparison of the alternatives considered, including the proposed action, the Environmental Consequences section of the DEIS is merely an attempt to justify a pre-conceived decision in violation of the NEPA and guidance from the EPA. It only discusses the narrowly-defined impacts of the Jordan Cove project itself.

Comment No. 7 - The DEIS does not provide the data, information, and analyses needed to produce a Record of Decision that would comply with the NEPA regulations. The DEIS does not provide sufficient bases to state what the decision was; to identify all alternatives that were considered in reaching the decision; to specify which alternative or

IND382-7

IND382 Continued, page 3 of 3

IND382-6 The purpose and need section has been clarified. The CEQ regulations at Part 1502.13 only require that an EIS should "briefly specify the underlying purpose and need" for a Project; which we have done in section 1.3 of the DEIS. The Commissioners will have a broader discussion of purpose and need in their Project Order. See response to IND1-6.

IND382-7 FERC does not prepare a record of decision. The Commission issues its decision in a Public Order. See the response to the previous comment.

20150217-5009 FERC PDF (Unofficial) 2/13/2015 6:01:20 PM

IND382 **Continued, page 3 of 3**

alternatives were considered to be environmentally preferable; and to discuss how environmental, technical, and economic considerations were balanced in arriving at the decision. The only alternative presented is the Jordan Cove project. Since there are no alternatives to consider, the environmental consequences section is nothing more than a justification of a pre-conceived decision, the approval of the Jordan Cove project, with a list of possible mitigation measures.

IND382-7
Cont'd

20150217-5011 FERC PDF (Unofficial) 2/13/2015 7:10:56 PM

IND383

Kathy Ryan, Days Creek, OR.
This pipeline should not be built. Using eminent domain to take land from U S citizens to benefit a Canadian company is wrong and should not be allowed, but if you do allow it to be built you must make sure safety is priority one. Do not allow thinner wall pipes and do require 100% of the welds be inspected. Make sure the gas is odorized. Require that the pipeline company equip and train all of the rural fire departments along the pipeline route so they can adequately deal with problems that come up. They are mostly volunteer and are not prepared for a pipeline disaster but will be the first responders. The pipeline route will provide a freeway for trespassers, vandals and "terrorists" so the pipeline company should provide manned stations along the pipeline to deal with problems that come up. You should require that the pipeline company hire an independent arbitrator to meet separately with each landowner along with a representative from the pipeline company to determine just and fair compensation including royalties. This pipeline is a very bad idea but if it is built it must be safe and secure, the gas must be odorized and the landowners well compensated.

IND383-1

IND383-2

IND383-3

IND383-4

IND383 Kathy Ryan, Days Creek, OR

- IND383-1 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947.
- IND383-2 The DOT, not FERC, regulates pipeline safety, they determine whether the gas should be odorized, not FERC.
- IND383-3 As discussed in section 4.10.2.5 of the DEIS, Pacific Connector would work with landowners to limit trespass along the pipeline. We are not aware of any terrorist attacks on buried pipelines.
- IND383-4 This is not necessary. The company will negotiate fair compensation for an easement with individual landowners. If the FERC issues a Certificate to Pacific Connector, and if the company and a landowner cannot come to an agreement, a local court will decide just compensation for the easement.

20150217-5010 FERC PDF (Unofficial) 2/13/2015 6:48:45 PM

IND384

IND384 Mary Jo Hoftiezer, Medford, OR

Mary Jo Hoftiezer, medford, OR.

I, Mary Jo Hoftiezer, of Medford, Oregon, do NOT support the construction of the proposed 230-mile natural gas pipeline and a liquefaction facility and export terminal the Jordan Cove Project and the Pacific Connector pipeline could create.

I oppose it for numerous reasons; but most importantly:
serious risk to environment and wildlife
further dependence on fossil fuels at great expense to the planet

Thank you,
Mary Jo Hoftiezer

20150217-5012 FERC PDF (Unofficial) 2/13/2015 7:46:38 PM

IND385

Joseph W. Fox, Eugene, OR.
Jordan Cove LNG Pipeline and Easement.

After perusing the EIS executive summary, I believe the EIS is incomplete and inadequate for 10 issues: 1) Pipeline construction impacts on streams and habitats. The EIS fails to take into account that human error may cause proper construction procedures to be circumvented multiple times resulting in inadequate estimations of environmental damage from erosion and soil damage. 2) The EIS fails to adequately review the pipeline's contribution on negative cumulative effects on Southern Oregon's environment. 3) The EIS fails to adequately review the pipeline's easements as portals for invasive species. 4) The EIS fails to adequately review the pipeline's easements as contributors to environment degradation when off-road vehicles use the easements as roads. 5) The EIS fails to adequately review the pipeline's contribution to increase wildland fire severity when the pipeline's easement converts forest to brush. 6) The EIS fails to adequately review the pipeline as an obstacle to monitoring and responding to wildland fires. 7) The EIS fails to adequately review the pipeline's inevitable methane leakage and its suppliers' "fracking" operations as contributors to cumulative environmental degradation and GHG causing global warming. 8) The EIS fails to adequately review how the inevitable economic unviability of the pipeline will lead to no money for, nor interest in, maintaining the easement and mitigating erosion events. 9) The EIS fails to adequately review the pipeline's contribution to cumulative environment degradation in Southern Oregon due to less money for mitigation of ecosystem damage when landowners rightly pay less tax because of the devaluation of their property due to the pipeline's presence. 10) The EIS fails to adequately review the pipeline's contribution to declining quality of life attributes and cumulative environment degradation in Southern Oregon due to less money for mitigation of ecosystem damage because tourists and retirees do not come to Southern Oregon due to the pipeline's presence.

IND385-1

IND385-2

IND385-3

IND385-4

IND385-5

IND385-6

IND385-7

IND385-8

IND385 Joseph Fox, Eugene, OR

- IND385-1 An Environmental Inspector (EI) would be employed to ensure that all construction procedures, BMPs, and mitigation measures are followed with regard to environmental protection.
- IND385-2 The cumulative effects of this project combined with other reasonable foreseeable projects is addressed in Section 4.14 of the EIS.
- IND385-3 Measures taken to minimize the risk of invasive species are addressed in sections 4.5 and 4.6 of the DEIS.
- IND385-4 Section 4.8.1.2 addresses OHV controls and the potential for increased unauthorized access. Section 4.10.2.5 discusses the concerns that unauthorized OHV use could adversely affect resources. Locations of particular concern are listed on page 4-850 of the DEIS. The Recreation Management Plan describes measures to control unauthorized use. Sediment arising from unauthorized use that occurs despite these control measures is unlikely to have a significant effect on resources and would be more than offset by mitigation to reduce sediment from roads (see table 2.5.2-1).
- IND385-5 The pipeline would be buried. We do not believe that a buried pipeline would contribute to fire risk or hamper efforts to control a wildfire. Wildfire prevention is discussed in section 4.13.9.1 of the DEIS.
- IND385-6 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3. The gas emissions that could result from gas burned at the proposed Jordan Cove power plant (i.e., a non-FERC jurisdictional facility) are disclosed in section 4.12 of the DEIS. Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.
- IND385-7 There is no reason to believe that the project would not be economically viable. The FERC staff does not attempt to determine the economic viability of a project.
- IND385-8 Socioeconomic impacts are evaluated in section 4.9. Cumulative effects are evaluated in section 4.14. The Project is not expected to significantly affect tourism or the ability of people to retire to Southern Oregon.

20150217-5013 FERC PDF (Unofficial) 2/13/2015 7:53:34 PM

IND386

Dr. Theodora Tsongas, Portland, OR.
 Docket # CP13-492; Docket # CP13-483
 Over 300 Oregon landowners are facing the threat of eminent domain from the 230-mile long pipeline needed to feed the LNG terminal. Veresen, a Canadian company is asking FERC to consider their enhanced profits from exporting LNG as a "public benefit", so they can condemn the land needed for the pipeline. This is absurd! There is no public benefit for Oregonians of in an increase in private profits of a Canadian company. Do NOT give the right to a foreign company to condemn Oregonian's land and deprive Oregonians from their livelihoods.
 FERC failed to consider an alternative that requires the pipeline through southern Oregon to be built to the same safety standards for the entire 230-miles. While the standards are set by the Department of Transportation, FERC should have considered the impacts of lower safety standards in the rough mountains of rural Oregon. The Canadian applicant will save money by using thinner pipes, less welds, and a host of other cost-saving measures. If the pipeline blows up, fewer people die in rural areas. FERC should have considered if people's lives are an acceptable trade for saving corporate profits. Furthermore, with lower safety standards, the risk of spills, explosions, and fires increases. Any increase in the already high wildfire risk in Oregon's forests is unacceptable. Climate change induced droughts in many areas are already causing great disruption of forest health, human health, and local and national commerce.
 This project will clearcut a 100' wide swath through wildlife habitat along 75 miles of public forests in southern Oregon, 80% of which had been reserved for imperiled wildlife. Over 400 waterways will have their stream-side vegetation permanently cleared. FERC failed to fully consider the impacts to our endangered wildlife that depend on these forests and streams, like the spotted owl, marbled murrelet, and coho salmon. Providing the avenue for the continued burning of fossil fuels (natural gas is NOT a "clean" transition fuel as asserted by the fossil fuel industry) only exacerbates climate change induced adverse impacts on the environment. FERC must consider the risks to health and the environment of the entire lifespan of natural gas from its production by fracking to its transport, storage, processing, export, and burning.
 The company's stated Purpose and Need for this project (in "Resource Report One") is to be able to continue and expand fracking. Since this project will facilitate increased fracking, FERC should have considered the cumulative impacts of fracking on our environment, including the impacts on the health of community members as well as the loss of valuable water resources, contamination of water sources. The Jordan Cove LNG Terminal and Pipeline environmental impact study failed to consider this projects contribution to our climate change problems. The Intergovernmental Panel on Climate Change (IPCC, 11-1-14 report) determined that by 2050 we must have reduced our reliance on fossil fuels by over 80%. The Jordan Cove terminal will have decades of life left by 2050. FERC failed to consider if this massive fossil fuel project would fit into that reduction, or if it could tip us over into unlivable climate change.

Do NOT approve the application for this terribly damaging project, both terminal and pipeline. It is NOT in the best interests of Oregon or the United States.

IND386-1

IND386-2

IND386-3

IND386-4

IND386-5

IND386-6

IND386-7

IND386 Theodora Tsongas, Portland, OR

- IND386-1 The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. The Commission would make its decision on public benefit in its Project Order. The Commission would issue its Order after we have produced an FEIS.
- IND386-2 The DOT, not FERC, regulates pipeline safety, they determine whether the gas should be odorized. The DEIS discloses the DOT requirements. Revising DOT safety standards is beyond the scope of this analysis.
- IND386-3 Comment noted.
- IND386-4 Impacts on old growth forest are addressed in section 4.5.1.2. Impacts on federally-listed threatened and endangered species are discussed in section 4.7 of the EIS as well as the BA.
- IND386-5 FERC has identified in the EIS the issues that are out-of-scope. For example, fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.
- IND386-6 In its application to the FERC, filed on May 21, 2013, Jordan Cove stated that the purpose and need for its liquefaction project was "a market-driven response to the availability of burgeoning and abundant natural gas supplies in the United States and Canada and rising and robust international demand for natural gas." Pacific Connector, in its application to the FERC filed on June 6, 2013, stated that the purpose of its project is to "connect the existing pipeline systems converging near Malin, Oregon and the proposed Jordan Cove Terminal at Coos Bay, Oregon," and the need for the project "is to supply approximately 1.02 Bcf/d of firm transportation service to Jordan Cove."
 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.
- IND386-7 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.

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IND387

IND387 Jade Severson, Ashland, OR

Jade Severson, Ashland, OR. Hello-- I attended the DEQ informational meeting in Medford on January 22nd and was unable to ask my questions due to time constraints. I have a few:

1. Why does the Forest Service see fit to regulate the creation of toothpick-sized trails in the Ashland watershed in Southern Oregon for sake of protecting soils, wildlife, and hydrology, while FERC's DEIS deems the impacts on those same three parameters -- soils, wildlife, and hydrology -- in the Pacific Connector project as little to none and capable of being mitigated?

IND387-1

For background on the Ashland Trails Project, see <http://www.dailytidings.com/article/20150107/News/150109881>

And for the Forest Service Environmental Analysis of that project, see http://al23.g.akamai.net/7/123/11558/abc123/forestservic.download.akamai.com/11558/www/nepa/89822_FSPLT3_2397535.pdf

Considering the massive swath of trees that would be eliminated with the construction of the Pacific Connector pipeline, not to mention the potentially lethal pipeline in its midst, it makes the Forest Service crackdown on a few illegally blazed trails in the Ashland watershed seem disproportionate. Why is that?

2. Why is there such bureaucratic separation of powers in the 401 certification process? Environmental scientists must be holistic in their analytic approach. I understand that the approval or revocation of the permit application must be based wholly on section 401 of the Clean Water Act, which limits decision-making to about four parameters. I assume that Veresen has had a great deal of legal advice on this question -- on what words to use and on what actions to propose for mitigation that would help clear the hurdles posed by this law. Why can't the DEQ be more wily in its advocacy for the State of Oregon, and particularly for the people of Southern Oregon who would throw themselves down Rachel Corrie-style in front of the Jordan Cove bulldozers? Sometimes you have to fight fire with fire, as Southern Oregonians well know. The DEQ is the government -- who is going to disapprovingly wag fingers if you spill over into the purview of other agencies? FERC? State sovereignty trumps FERC in this case, if I understand correctly. Am I correct? Why can't the DEQ do some lawyering with the facts and persuasively manipulate hard scientific data to reject this permit? Veresen is doing it in their favor, so why can't the DEQ?

IND387-2

3. How can you dismiss the drought in Southern Oregon as mere contingency or speculation, as was done at the meeting, let alone climate change or the potential deposition of CO2 emitted by the LNG facility in Coos Bay into the Pacific Ocean and subsequent water acidification? The carbon cycle happens. Increased CO2 emissions are certain in the event that the facility in Coos Bay is built. Where is the water going to come

IND387-3

IND387-4

IND387-1 The EIS discloses the potential impacts that would occur to soils (see section 4.3 of the EIS), wildlife (see sections 4.6 and 4.7), and hydrology (see sections 4.4, 4.6, and 4.7). These sections do not conclude that there would be no impact to these resources.

IND387-2 The 401 and 404 process are under the jurisdiction of the Army Core of Engineers and the ODEQ, not the FERC.

IND387-3 We disagree that they are certain. Increased CO2 emissions in one location may be offset by CO2 emission reductions elsewhere. See discussion in section 4.12.1.4 of the DEIS.

IND387-4 As stated in section 4.4.2.2, water for hydrostatic testing would be obtained from commercial or municipal sources, private supply wells, or from surface water right owners (see table 4.4.2.2-10). If water for hydrostatic testing would be acquired from surface water sources, Pacific Connector would obtain all necessary appropriations and withdrawal permits, including from the ODWR, prior to use. As part of this process, ODWR would have the applications reviewed by ODEQ and ODFW to determine if there are concerns about the impact water withdrawals may have on water resources, (including concerns relating to the timing, seasonality, and method of withdrawal), as well as water quality and/or fish and wildlife species and the habitat, respectively. ODWR would provide public notice and opportunity to comment on the applications.

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IND387 Continued, page 2 of 2

from that the DEIS states will be needed for this project? That could be considered speculation, since it is an estimate, but then again, the entire DEIS is speculation. Nothing is certain; nothing can be said for sure about how a pipeline will be constructed or how exactly its function will be executed. This is pure semantics, and, as such, not in the domain of FERC or Oregon DEQ to decide. They will need that water for that project, and it isn't here -- that isn't speculation. That's a fact. We haven't had a snow pack here for the last two winters. Reservoirs are empty. The land is a tinderbox. This past summer, Medford had bombers landing at its airport every minute in an attempt to douse the Oregon Gulch Fire and the other fires in the Klamath and Rogue River watersheds. Propelled by the lack of winter snowfall, those fires were so strong that they created their own weather systems. That's hydrology. See the photos taken by the Oregon Air National Guard of the pyrocumulus clouds generated by the fires here:
http://www.slate.com/blogs/future_tense/2014/08/05/oregon_gulch_fire_photos_show_pyrocumulus_clouds_and_fighter_jets_over_wildfire.html
When people discuss potential explosions on a largely unsupervised pipeline that could spark an enormous wildfire, that is speculation, but it's also good planning. Call it common sense or forethought or what you will. The Oregon Gulch Fire was dangerous, and became exponentially more dangerous when it began to generate its own thunderclouds. And that happened because the fire was burning hot. There was no moisture in the ground to thwart it. Fires devastated the Rogue and Klamath watersheds and the animals and people that inhabit them. A pipeline-generated fire is the last thing we need. And why isn't there a permit for wildfire prevention strategies?

IND387-4
Cont'd

IND387-5

4. The DEIS vaguely mentions in its introduction that it would not be possible to convert existing LNG storage facilities in the Pacific Northwest because those ports were not adequate for tanker vessels. So, why doesn't Veresen choose to dredge another port to render it adequate for its needs? That question is soon answered in the DEIS: "There are other proposals to construct and operate new LNG export terminals in British Columbia, Canada, Alaska, and in Warrenton, Oregon. In the case of the proposed British Columbia terminals, their permitting status appears uncertain and they may not be ready for construction within the same time frame as the Jordan Cove terminal" (ES-4). Why is the permitting status of the terminals in BC uncertain? Here is a lawyer-prepared overview of the LNG project permit process in British Columbia:
http://www.blakesfiles.com/Guides/Blakes_Requirements_for_LNG_Projects_BC_Feb_2014.pdf

IND387-6

- IND387-5 The comment that wildfires are dangerous is noted. Wildfire prevention is discussed in section 4.13.9.1 of the DEIS.
- IND387-6 Comment noted.

20150217-5020 FERC PDF (Unofficial) 2/13/2015 9:19:19 PM

IND388

IND388 Jason Wellman, Eugene, OR

Jason Wellman, Eugene, OR.

Though it becomes clearer every day that we are standing on the threshold of climate catastrophe, the Federal Energy Regulatory Commission is considering a project that would expand earth-destroying extractive industries and flatten Oregon forests. Cascadia Forest Defenders unequivocally opposes the construction of the Jordan Cove LNG export terminal and pipeline. A foreign corporation's profits should never be chosen over the health of the land, the water, and the people who need them.

FERC failed to consider an assortment of the ways in which this project would devastate the environment, not only here in Oregon but across the country and around the world. Liquified Natural Gas is methane, a greenhouse gas 86 more times more potent than burning coal. Methane leaks into the atmosphere during the processes associated with LNG drilling, transportation, and processing. It also notoriously contaminates groundwater; methane concentrations are 17 times higher in drinking water wells near fracking sites than in normal wells.

IND388-1

Approving the Jordan Cove terminal and Pacific Connector Gas Pipeline would expand the fracking operations that enable that leakage to happen. There are already more than 500,000 active natural gas wells in the US, each of which requires one to eight million gallons of water for each fracture job. Enabling this industry to grow even more is an act of blatant disregard for the planet, for our limited life-sustaining natural resources, and for the wellbeing of the people most influenced by fracking operations.

IND388-3

Here in Oregon, the project would cause hundreds of landowners to lose their properties to eminent domain. No company should have the right to condemn Oregonians' land and lifestyles - especially not a company that will cut corners around safety standards by using thin pipes and inefficient welds. Many of the landowners who face eminent domain threats have been speaking out against the pipeline for years; FERC, why haven't you been listening?

IND388-4

The project additionally commissions a vast clearcut - a 100-foot wide easement across 75 miles of southern Oregon public forests, most of which have been reserved for threatened species like the Marbled Murrelet, the Northern Spotted Owl, and the Coho Salmon. 400 waterways will have their stream-side vegetation permanently cleared. This is unfathomable and inexcusable.

IND388-5

IND388-6

IND388-1 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.

Information has been added to the FEIS that addresses methane leakage and the relative impact of natural gas compared to coal.

IND388-2 Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

IND388-3 See response to comment IND388-2 above.

IND388-4 See response to comment IND388-2 above.

IND388-5 Impacts on federally-listed threatened and endangered species are discussed in section 4.7.

IND388-6 As discussed in section 4.4.2.2, after construction, streambanks would be restored by seeding and woody riparian vegetation planted for stabilization according to Pacific Connector's ECRP.

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IND389

ErinO'Kelly, eugene, OR.

I'm from Klamath County originally and Still have family there. I believe this plan is not in anyone's best interest except for those who profit from it.

A plan like Jordan Cove will jeopardize the planet and the health and safety of those who live in and surrounding areas. Some of the things that are very much an issue to worry about is the water and land pollution along with the destruction of the many different creatures and plant life in that area.

With our country and perhaps our entire planet facing such a severe droughts in the near by future it would not be smart to dig in to land that has so many amazing fresh clean drinking water wells. You may try to argue that this line wont be near those areas but that's not how things work. when the earth gets distressed by unnatural activity like digging hundreds of miles into the ground and under its surface it will effects everything for miles and miles. It wont just be our fresh clean drinking water that we have to worry about. There wild life in those areas will be effected negatively as well. Along with what ever ends up leaching out of the piped into the land/

I continue to read about different pipe lines not living up to what the people are told and becoming dangerous to live around. I'm seriously beginning to question the scientist and the science behind approving such project along with the morals of the people that are leading this kind of destruction to our land.

-Erin

IND389 Erin O'Kelly, Eugene, OR

IND389-1 As discussed in section 4.4.2.1, in its Groundwater Supply Monitoring and Mitigation Plan, Pacific Connector states that should it be determined after construction that there has been an effect to groundwater supply (either yield or quality), Pacific Connector would provide a temporary supply of water, and if determined necessary, would replace the affected supply with a permanent water supply. Mitigation measures would be coordinated with the individual landowner to meet the landowner's specific needs.

Section 4.6 discusses effects to wildlife and mitigation. Section 4.13 discusses safety plans to detect and mitigate leaks.

20150217-5023 FERC PDF (Unofficial) 2/13/2015 10:41:10 PM

IND390

Anna Fay Putman, Klamath Falls, OR.
Whoever hashed out the plan to do this clearly has no knowledge of the Pacific Northwest bioregional ecosystem or geology. I on the other hand, am a concerned 'citizen scientist' and lifelong Cascadian. My specialization is research and writing on issues of health, ecosystems, and the big picture issues that affect civilization and the potential for future life to exist on this planet.

This, and other pipeline projects in the works are crimes against humanity, the web in which we depend upon for life, and the world in which our decedents will inherit--which is swiftly reaching Mordor-like levels of annihilation.

It is preposterous, and incredibly insulting, to carve a 100-foot-wide permanent scar across the beautiful state of Oregon in order to blast a high-pressured pipeline of incredibly flammable material destined for export. Its path is haphazardly planned to cut under and across the Klamath, Rogue, Umpqua, Coquille & Coos watersheds, (400+ streams & riparian habitat), the Cascade mountains (a fault line & earthquake prone area), across public and private ecosystems, miles and miles of forest, wetlands and desert and then to an explosive storage facility in pristine coastal habitat...which moonlights as a [occasional, but definite] tsunami hazard zone. BRILLIANT!

There is no way in hell that Oregonians will let this happen. Too many of us have a deep connection to the land, water, and soil here. Our environment IS our culture, economy and livelihood.

We do not accept or support the fossil fuel establishment and the continued expansion of the built-to-fail empire. Personally, I feel it incredibly disrespectful and ignorant that this is even on the table. It's a slap in the face to basic knowledge. Fracking should be banned, not expanded. We should keep what resources are extracted from American lands IN AMERICA. It makes ZERO sense to be importing AND exporting energy resources. This will drive up the price of natural gas at home, which will leave many rural families (my family included) without the ability to afford to heat their homes in winter. This is an extremely short-sighted, horrendously threatening, and frankly EVIL scheme.

The environmental impact statement is like running blindfolded into a bonfire. WOOF! This project proposal makes ZERO SENSE to anyone with two eyes and a brain. Surely besides the fat cats set to profit. All pipelines WILL break, pollute and put lives in jeopardy.

WE CASCADIANS, PROMISE TO REJECT ALL PIPELINES & PUT AN END TO THE FOSSIL FUEL TRAIN TO HELL!

IND390-1

IND390-2

IND390 Anna Fay Putman, Klamath Falls, OR

IND390-1 Impacts to waterbodies (including those mentioned in this comment) and wetlands are addressed in section 4.4 of the EIS. Impacts to forests are addressed in sections 4.5, 4.6, and 4.7. Impacts to soils and geology are addressed in sections 4.2 and 4.3; while safety and reliability issues related to earthquakes and tsunamis are addressed in section 4.13.

IND390-2 It is the U.S. Department of Energy (not the FERC) that has authority over the overall U.S. energy policy; therefore it is outside the scope of this EIS to assess or change the overall U.S. energy policy. Fracking, or hydraulic fracturing, is used during exploration and production of natural gas. As stated in our response to IND1-2, the FERC does not regulate the exploration or production of natural gas. In fact, fracking is not part of the Project; and therefore, the environmental impacts associated with that activity will not be analyzed in our environmental document. See response to IND1-3.

20150217-5024 FERC PDF (Unofficial) 2/13/2015 10:48:31 PM

IND391

Henry W. Newhouse, Florence, OR.
The FERC draft EIS concerning the Jordan Cove LNG project is woefully inadequate in addressing major issues. One, it does not address the impacts of a 9.0 or more earthquake. Every three hundred plus years history shows there have been 9.0 plus earthquakes. We are now over three hundred years. That must address the potential impacts to 1. 101-highway bridge crossing Coos Bay; 2. the railroad bridge crossing Coos Bay; 3. 101 causeway; 4. potential for natural gas line rupture; 5. liquidification of the berm; 6. liquidification of the site the LNG plant sits; 7. liquidification of the site for the power plant.
The draft EIS does not address greenhouse gas emissions. Projected emissions are two million, one hundred metric tons per year. This amount of CO2 will contribute to climate change.
The Pacific connector pipeline will likely rupture in multiple places with a 9.0 or earthquake.
The draft EIS does not address the impacts on port traffic while an LNG ship is being loaded or when a loaded LNG ship is exiting the bay.
The draft EIS does not address the potential of a ship of that size going aground.
The draft EIS does not address contaminated toxic soils that were found at the construction site. Analysis is required to determine if the site is a HAZMAT area.
The draft EIS does not comply with NEPA.

IND391-1

IND391-2

IND391-3

IND391-4

IND391 Henry W. Newhouse, Florence, OR

- IND391-1 See response to comment IND1-4 and IND73-16.
- IND391-2 Climate change was addressed in section 4.14.3.12 of the DEIS. Greenhouse gas emissions resulting from the Project were discussed in section 4.12.1.4 of the DEIS. See response to IND1-1.
- IND391-3 Impacts to marine traffic are discussed in Section 4.10.1.1. LNG Vessel Hazards are assessed in section 4.13.6.
- IND391-4 Soil contamination is addressed in the Potentially Contaminated Upland Soils section (beginning on page 4-300) and section 4.3.2.3 of the DEIS.

20150217-5156 FERC PDF (Unofficial) 2/13/2015 11:37:51 PM

IND392

FERC Staff

Subject: Who Developed Table 3.4.2.2-1?

Question: Is the form of the Table, and are the questions posed on Table 3.4.2.2-1, the creation of Williams Pacific Connector or was this form created by FERC?

This is an important question in that if the form itself, the questions it poses and the information it contains is from Williams Pacific Connector then it must be considered in a different light than if the form is a standard form that FERC provides to Williams Pacific Connector for their completion.

Which is it?

The Table (3.4.2.2-1) itself contains enough significant information that is either in error, missing or misleading that it is unusable for reaching any conclusion as to the environmental impact of the proposed route versus the BRAR 13 route.

Further, the use of Table 3.4.2.2-1 and its data provide without identifying the source of the form and the source of the data makes it further suspect as the basis of a real and clear comparison of Pacific Connectors proposed route with the modified Blue Ridge 2013 Alternative.

-Karen Solomon

IND392 Karen Solomon

IND392-1 FERC determines what information is presented in each of the tables in the DEIS, The applicant provided information in its resource report. FERC, its third-party contractor, and the BLM review the data and request additional information where there is a need.

IND392-2 The FEIS contains a new appendix that contains additional details regarding the comparison of the proposed route to the Blue Ridge alternative.

IND392-1

IND392-2

20150217-5168 FERC PDF (Unofficial) 2/13/2015 8:04:24 PM

IND393

February 13, 2015

FERC Staff,

Subject: Table 3.4.2.2-1 Page 3-28 – The Number of “Fish Bearing Bearing Streams Crossed is Not Accurate

Question: If there are 41 perennial streams on the proposed route, how does the FERC come up with 6 “fish bearing streams crossed” on the proposed route?

Virtually all perennial streams in Southwest Oregon are fish bearing. The Draft EIS statement that there are only “6 fish bearing streams crossed” on the proposed route is false and inaccurate.

On Table 3.4.2.2-1, the FERC states that the proposed route has 9 streams that will be crossed with “fisheries critical habitat”? You cannot have only 6 fish bearing streams crossed if the proposed route has (which it does) 9 streams with “fisheries critical habitat” (native Coho salmon).

This is just one example of the false, misleading and erroneous information on Table 3.4.2.2-1.

Sincerely,
Dave and Emily McGriff

IND393-1

IND393 Dave and Emily McGriff

IND393-1 The number of perennial and fish bearing streams crossed by the pipeline is presented in table 4.6.2.3-4. This defines the method used to determine fish presence which often was assumed without actual information that fish were present.

20150217-5170 FERC PDF (Unofficial) 2/13/2015 8:13:41 PM

IND394

Feb. 13, 2015

FERC Staff,

The Jordan Cove/PCGP DEIS provides an inadequate analysis of the human habitat affected by the alignment of the pipeline on the Proposed Route. Table 3.4.2.2-1 asks the question how many homes are within 50 feet of the right of way on both the proposed route and the Blue Ridge route. This question results in one home on the proposed route and none on the Blue Ridge route.

However, if the FERC was to ask how many homes are within 500 feet of both the proposed route and the Blue Ridge route alignment they would find the following:

- Proposed Route – Number of Homes within 1000ft. = 51
- Blue Ridge Route – Number of Homes within 1000ft. = 0

The Table 3.4.2.2-1 provides no analysis of the effect on human habitat on the proposed route versus the Blue Ridge route. The analysis it does provide is misleading.

Sincerely,
John Muenchrath

IND394 John Muenchrath

IND394-1 The commenter claims that the table "provides no analysis of the effect on human habitat on the proposed route versus the Blue Ridge route" however, the commenter then cites the analysis (i.e., the list of homes within 50 feet). There is no grounds or precedent set to assess homes within 1,000 feet.

IND394-1

20141229-0013 FERC PDF (Unofficial) 12/29/2014

LA1



Southwest Oregon Regional Airport

FILED
SECRETARY OF THE COMMISSION
2014 DEC 29 P 2:29
FEDERAL ENERGY REGULATORY COMMISSION

ORIGINAL

December 22, 2014

Federal Energy Regulatory Commission
888 1st Street NE
Washington D.C. 20426

RE: Jordan Cove Liquefaction and Pacific Connector Pipeline Projects
Docket No. CP13-483-000; CP13-492-000

The Coos County Airport District (District), the legal taxing district authorized by the legislative body of the state of Oregon to operate the Southwest Oregon Regional Airport (Airport) in North Bend, Oregon, submits these comments on the Draft Environmental Impact Statement (DEIS) for the Jordan Cove Liquefaction and Pacific Connector Pipeline Projects (Project). The Airport is located approximately 1.24 miles from the proposed site of the Project, and approximately 0.85 miles from the proposed site of Amine Tower 2-E. As the operator of the Airport, the District has followed the development of the Project carefully to assess whether the Project would compromise the safety or efficiency of the Airport, including the airspace surrounding the Airport necessary for arrivals and departures.

The DEIS discusses the potential impacts of the Project on the Airport in Chapter 4.10.1.4, Air Traffic. The DEIS states that

The FAA found that the LNG terminal would have no impacts on arrivals, departures, or en-route procedures under Instrument Flight Rules. The LNG terminal would have no impacts on planned use of airport facilities, and no cumulative impacts on the airport were identified.

DEIS at 4-842. The DEIS also notes that certain structures within the project will penetrate the Horizontal Surface as described in the Federal Aviation Administration (FAA) Regulations 14 C.F.R. Part 77 "Objects Affecting Navigable Airspace," thus requiring further evaluation by the FAA to determine whether the structures would be a hazard under Part 77. DEIS at 4-842. Accordingly, the DEIS recommends that

Prior to construction, Jordan Cove should file with the Secretary documentation of its consultations with the FAA, and the results of any aeronautical studies conducted under Federal Aviation Regulations Part 77, Safe, Efficient Use, and Preservation of the Navigable Airspace, together with copies of any official determinations made by the FAA with respect to the LNG terminal and related facilities.

LA1-1

1100 Airport Lane
North Bend OR 97459

Executive Director: theresa@flyoth.com
Administration: rybert@flyoth.com
Business Manager: xordon@flyoth.com

www.flyoth.com
Phone: 541.756.8531
Fax: 541.751.1010

LOCAL AGENCIES AND GOVERNMENTS

LA1 Southwest Oregon Regional Airport

LA1-1 Comment noted.

20141229-0013 FERC PDF (Unofficial) 12/29/2014



The District strongly concurs with that recommendation and believes that the FAA process will assure that the Airport continues to operate safely and efficiently.

LA1-1
cont.

The District believes that FERC should be aware that the District is actively participating in the ongoing discussions between the Project sponsor and the FAA regarding the potential impacts on VFR operations in order to assure that the Project does not impair safe operations at the Airport. To assist the District in those discussions, the District determined it was in the best interest of the Airport Community and its stakeholders, which includes but is not limited to; the users of the Southwest Oregon Regional Airport, the Governing Body of the Airport and the taxpayers of the Coos County Airport District, to perform an independent analysis of the potential impacts on operations at the Airport.

Accordingly, the District retained the services of nationally recognized experts in airport law, including specifically Federal Aviation Regulations Part 77, instrument flight procedures, air space design, and flight operation rules and standards, in order to independently assess whether the Project would have an adverse impact on the Airport or not. These professionals were tasked with analyzing the Project based on the application of multiple criteria, identifying potential impacts on operations in accordance with FAA regulations and standards; performing a technical analysis to assess whether the Project would affect safety and efficiency or not; and exploring possible future impacts on the future development of the Airport.

LA1-2

This analysis included reviewing analyses and information prepared by the FAA, the State of Oregon Department of Aviation, and the Jordan Cove Project developers, as well as also the preparation of new analyses pertaining to identification of penetrations to the defined Part 77 Obstacle Identification Surfaces (e.g., the horizontal surface), approach and departure flight paths, FAA's standards for evaluating whether an obstruction would have a substantial and significant adverse aeronautical effect, and application of other FAA-recognized standards to assess the potential effects of the Project on IFR procedures and operations, VFR operations, traffic pattern utilization, and runway utilization. The District's experts have independently consulted with Airport users, including FBOs and air carriers, to assure that local practices and procedures are accounted for.

The District is using this analysis and expertise in the ongoing discussions with the FAA and the Project sponsor to assure that potential impacts of the Project on the Airport are correctly defined, and are appropriately addressed and mitigated. Although it is premature to discuss the results of the analysis or the discussions with the FAA, the District believes that the FAA process will address and resolve any impacts of the Project on the Airport and will allow the Project to proceed as proposed without having an adverse effect on Airport operations or safety.

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Cook".

Theresa Cook, MAS, AAE
Executive Director
Southwest Oregon Regional Airport

1100 Airport Lane
North Bend OR 97459

Executive Director: theresa@flvoth.com
Administration: robert@flvoth.com
Business Manager: gordon@flvoth.com

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Phone: 541.756.8531
Fax: 541.751.1010

LA1 Continued, page 2 of 2

LA1-2 Comment noted.

20150211-5615 FERC PDF (Unofficial) 2/10/2015 9:03:47 AM

NAT



January 28, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission,
888 First St. NE, Room 1A
Washington, DC 20426.

GOVERNMENT

OFFICES

2371

NE STEPHENS

STREET

SUITE 100

ROSEBURG

OREGON

97470

(541) 672-9405

FAX NUMBER

(541) 673-0432

RE: Comments on the Draft Environmental Impact Statement for the Jordan Cove Liquefaction and Pacific Connector Pipeline Projects (Docket Nos. CP13-483-000 and CP13-492-000).

Dear Ms. Bose:

The longstanding and distinctive relationship between the United States, and Tribal Governments is defined by treaties, statutes, executive orders, judicial decisions, legislation, and agreements, which differentiate Tribal Governments from all other entities that deal with, or are affected by the Federal Government. This relationship has given rise to a special Federal trust responsibility involving the legal responsibilities and obligations of the United States toward Indian Tribes and the application of fiduciary standards of due care with respect to Indian lands, tribal trust resources, and the exercise of tribal rights.

As part of this distinctive Government-to-Government relationship, the Cow Creek Band of Umpqua Tribe of Indians (the Tribe) would like to submit the following formal comments regarding the Draft Environmental Impact Statement for the Jordan Cove Liquefaction and Pacific Connector Pipeline Projects (Docket Nos. CP13-483-000 and CP13-492-000).

First and foremost the Tribe is in disagreement with the Federal Energy Regulatory Commission (FERC) that *construction and operation of the projects would result in some limited adverse environmental impacts, but these impacts would be reduced to less-than-significant levels*. We also disagree with FERC that the Pacific Connector Pipeline Project would *not have significant adverse impacts on Native American communities or tribal lands and resources* (DEIS 4-829). In order to make these claims, FERC must demonstrate that actions which may cause loss or destruction of cultural or historical resources have been fully mitigated. Without mandatory monitoring and mitigation requirements, it would be nearly impossible to make these claims.

Approximately 121 miles of the Pacific Connector Pipeline Project would bisect the Tribe's ancestral territory. These lands and the cultural and environmental resources on and within them are vital to the cultural history and revitalization

NATIVE AMERICAN TRIBES

NA1 Cow Creek Band of Umpqua Tribe of Indians

- NA1-1 The tribe has not presented any evidence to support their opinion. The FERC conclusion is supported by the findings in the EIS.
- NA1-2 See response to NA1-1.
- NA1-3 As discussed in section 4.11 of the EIS, we agree that a portion of the pipeline route would cross ancestral and ceded lands of the Cow Creek Band of Umpqua Indians (Cow Creek Tribe); however, much of this land is now non-tribal private property, or owned and managed by the federal or state government.

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NA1 Continued, page 2 of 3

of the Cow Creek people. Any impact in this area is "Significant" when considering the affected interests of our Tribe. Our Tribe is not mobile, our culture is tied to a fixed remnant land base. Unmitigated environmental and/or cultural resource damage resulting from this project has the potential to jeopardize our cultural way of life and the health of our Tribal citizens. FERC has not done an adequate job considering the Tribal "Context" in the DEIS. In order to determine "Significance", FERC must consider both Context and Intensity. FERC's conclusions regarding Tribal impacts are arbitrary and capricious.

NA1-4

The Tribe believes the proposed Pacific Connector Gas Pipeline has the potential to significantly affect the Cow Creek Tribe's rights and resources, specifically significant cultural resources. These cultural resources include but are not limited to: religious and sacred sites; customary hunting, fishing and gathering areas; traditional cultural properties; traditional plants; burial grounds; and archaeological sites (also see Tribal Comment Letter dated January 15, 2013). Each of these resource types is vital to the cultural continuity and survival of the Tribe. Therefore, effects to these sacred resources must be addressed in the appropriate context; i.e. Tribal Context. In places where impacts to these essential resources cannot be avoided, appropriate mitigation must be provided.

NA1-5

For resources meeting the National Historic Preservation Act's definition of historic properties, a memorandum of agreement (MOA) must be drafted in consultation with the Cow Creek Tribe. The MOA should include the development of a historic properties management plan that addresses the treatment of historic properties and the protocol for inadvertent discoveries during and post construction. Again, these documents must be drafted in close consultation with the Tribe.

NA1-6

In addition to culturally appropriate mitigation for impacts to all tribal cultural resources and the development of historic property management plans, the Tribe requires that a monitoring agreement be executed to allow for the Tribe to conduct cultural and environmental resource monitoring of the Pacific Connector Gas Pipeline. This monitoring shall include pre-construction, construction, and post construction activities to ensure that the Tribe's life sustaining cultural resources are identified and treated in a culturally and environmentally sensitive manner.

NA1-7

The Tribe would like to request that FERC reexamine their Cultural Resource findings, and apply their analysis using the appropriate Context. The Tribe would also like to request that FERC mandate the implementation of a cultural mitigation and monitoring program to ensure compliance with all mitigation measures that become conditions of any FERC authorization.

NA1-8

NA1-4 Neither the National Historic Preservation Act nor the implementing regulations for Section 106 at 36 CFR 800 use the term "Context;" therefore we do not have to consider it under law or regulation. Our findings are not arbitrary or capricious and are in fact defended in the body of the narrative in the EIS.

NA1-5 The DEIS acknowledges that the Project has the potential to significantly affect cultural resources as well as the concerns of consulted Indian tribes and Native American organizations. Since cultural resources investigations and tribal consultations are ongoing, mitigation measures for specific impacts have not yet been determined. The Project would not be allowed to occur without completion and approval of those studies and treatment/mitigation plans, as well as completion of an MOA with SHPO (and potentially ACHP), and MOU with consulted tribes, including the Cow Creek Band (see page 4-860 and 4-873). Following completion of these studies, mitigation plans, and consultations, the Project's significant impacts will have been sufficiently mitigated to meet the NEPA standards for less than significant impacts on cultural resources. An Unanticipated Discovery Plan for Jordan Cove has been finalized, as of August 2013 after receiving comments from consulted tribes. The Unanticipated Discovery Plan for Pacific Connector will be finalized pending incorporation of comments received from the SHPO in August 2013. (See Section 4.11.4 on page 4-872 of the DEIS.) Please note, cultural and historical contexts are included in the cultural resources survey reports and resource reports and resources that have been evaluated to date have been reviewed in light of these contexts as have impacts evaluated under Section 106 of the NHPA.

NA1-6 As noted on pages 4-860 and 4-873 of the DEIS the Project will not be allowed to begin construction until all agreements with consulted Indian tribes and other agencies as well as an HPMP have been completed. An Unanticipated Discovery Plan for Jordan Cove has been finalized, as of August 2013 after receiving comments from consulted tribes. The Unanticipated Discovery Plan for Pacific Connector will be finalized pending incorporation of comments received from the SHPO in August 2013. (See Section 4.11.4 on page 4-872 of the DEIS.)

NA1-7 Tribal monitoring of the Project is anticipated to be addressed through the in-process tribal consultations and would be established in any MOA(s) with the consulted tribe(s). As noted on pages 4-860 and 4-873 of the DEIS the Project will not be allowed to begin construction until all agreements with consulted Indian tribes and other agencies as well as an HPMP have been completed. As standard, the HPMP would outline all monitoring protocols.

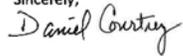
NA1-8 The analysis presented in the DEIS is a NEPA analysis and the impact significance determination is consistent with NEPA. Please note, cultural and historical contexts are included in the cultural resources survey reports and resource reports and resources that have been evaluated to date have been reviewed in light of these contexts as have impacts evaluated under Section 106 of the NHPA. The Project would not be allowed to begin construction until an HPMP that outlines cultural resources monitoring protocols has been finalized (see page 4-873 of the DEIS).

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NA1 Continued, page 3 of 3

Please be aware that there is more work to be done in consultation with the Cow Creek Band of Umpqua Tribe of Indians by FERC. We look forward to meeting in the near future.

Thank you for the opportunity to submit these comments.

Sincerely,


Daniel Courtney
Tribal Chairman

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NA2



**CONFEDERATED TRIBES OF
COOS, LOWER UMPQUA & SIUSLAW INDIANS**
1245 Fulton Ave. Coos Bay, OR 97420
Phone (541) 888-9577 or 1-888-280-0726
Fax (541) 888-2853

February 13, 2015

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First St. NE, Rm. 1A
Washington, D.C. 20426

Re: Comments of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw
Draft Environmental Impact Statement
Jordan Cove Docket: CP13-483-000 and Pacific Connector Docket: CP13-492-000

Dear Secretary Bose:

The Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians (CTCLUSI) 1.6 million acre Ancestral Territory extends south along the Pacific Ocean coastline from Tenmile Creek (near the boundary between Lane and Lincoln County) south to Fivemile Point in Coos County, thence east to the crest of the Coast Range. Thus the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians Ancestral Territory includes the location of the proposed terminal and a portion of the proposed pipeline. The Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians limit our comments to the potential effects and impacts of the Project on the area of the CTCLUSI Ancestral Territory and defer to the most appropriate Tribe(s) on matters limited to areas outside of the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians Ancestral Territory.

The Tribes have an interest in maintaining a resilient, sustainable, clean, safe, and productive environment and protection of cultural resources for the benefit of our Tribal membership today and for future generations.

While the Confederated Tribes have expressed interests and concerns related to these proposed dockets including safety and environmental justice, this letter will comment primarily on cultural resource protection concerns. The Tribes' initial concerns are as follows.

Consultation with the Tribes

Consistent with Executive Order 13175 and the Federal Energy Regulatory Commission's *Policy Statement on Consultation with Indian Tribes in Commission Proceedings* (2003), the Tribes'

NA2-1

NA2 Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians

NA2-1 EO 13175 does not apply to the FERC. The EO specifically excludes the FERC as an independent regulatory agency. The FERC conducted government-government consultations with tribes in accordance with our Policy Statement. As documented in section 4.11 of the EIS, we sent notices and individual letters directly to tribal governments and staff held non-public meetings with any tribe that requested a meeting.

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request government to government consultation with the Federal Energy Regulatory Commission to further engage in the Project's potential impacts to Tribal environmental and cultural resources. It is the Commission's trust responsibility and a recognition of the Tribes' sovereign status to provide government to government consultation with the Tribes directly. Public meetings are not government to government consultation and individual comments made by Tribal membership do not necessary represent the concerns of the Tribal Government or Tribes as a whole.

NA2-1
Cont'd

Fish and Wildlife

It should be recognized that natural resources are cultural resources for the Tribes.

We request that the Draft EIS be revised to better address any impacts identified by the USFWS, NOAA, and other tribes. Impacts to water, air and soils directly affect aquatic and wildlife species. Traditional, ceremonial, and subsistence use of these resources directly affects the health of the Tribes and our culture. Any impacts to Tribal resources may be expected to affect the Tribes at a disproportionately higher rate than other resource users.

NA2-2

The Pipeline and LNG terminal will have potentially significant impacts to the estuary, upriver aquatic riparian, and forested habitats important to species that are central to the Tribes' culture. Due to the projects location within our Ancestral Territory, we support the protection and preservation of these habitats to prevent degradation, pollution and introduction of nonnative species which will impact tribal resources and the overall health of the environment.

We are supportive of comments made by NOAA's National Marine Fisheries Service and with the comments of the U.S. Fish and Wildlife Service. Additionally, it should be noted that the Draft EIS needs to further address impacts of potential spills, leaks and natural disasters, as well as the confirmed activities of dredging, erosion, and substantial water withdrawal from local aquifers. Additionally, the Draft EIS falls short in examining the cumulative impacts over the life of the project.

NA2-3

Cultural Resources

The Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians have cultural resources concerns and wish to further consult with Jordan Cove LNG, Pacific Connector Pipeline, and FERC to ensure that cultural resource sites can preferably be avoided but when that is not possible, at least adequately mitigated for. These projects require Federal permitting and as such we would like to remind all involved Federal agencies that not only "historic properties" but prehistoric properties are important non-renewable resources. In addition, NEPA allows for the broader interpretation of cultural resources to be included in the review, not just archaeological sites but also sacred sites, traditional gathering/use sites, and the natural landscape/ecosystem that have cultural significance.

NA2-4

There are also concerns with effects determinations as numerous portions of the pipeline route, various staging areas, access roads, and a workers camp for the LNG terminal have yet to be surveyed. Other identified sites have not been adequately studied to determine if they are

NA2-5

NA2 Continued, page 2 of 3

NA2-2 Comment noted.

NA2-3 Comment noted. Section 4.4 addresses prevention and mitigation for potential spills from hazardous materials in regards to the potential pollution of ground and surface waters as well as dredging, erosion, and water withdrawal. Section 4.13 addresses prevention and mitigation for leaks and natural disasters. Cumulative effects are discussed in Section 4.14.

NA2-4 NHPA Section 106 coordination to address Tribal environmental and cultural resources is currently in process. The DEIS acknowledges that the Project has the potential to significantly affect cultural resources as well as the concerns of consulted Indian tribes and Native American organizations. Since cultural resources investigations and tribal consultations are on-going, mitigation measures for specific impacts have not yet been determined. The Project would not be allowed to occur without completion and approval of those studies and treatment/mitigation plans, as well as completion of an MOA with SHPO (and potentially ACHP), and MOU with consulted tribes, including the Tribes of the Coos, Lower Umpqua, and Siuslaw Indians (see page 4-859 and 4-873). Following completion of these studies, mitigation plans, and consultations, the Project's significant impacts will have been sufficiently mitigated to meet the NEPA standards for less than significant impacts on cultural resources. No sacred sites, traditional gathering/use sites, or cultural landscapes have been identified through the Project's cultural resources surveys or tribal consultations.

NA2-5 As documented in section 4.11.1.2 of the EIS we identified historic properties and project effects in accordance with Section 106 of the NHPA and its implementing regulations at 36 CFR 800. Copies of all survey reports were sent to tribes, so that tribes also had the opportunity to comment. We consulted with the SHPO on all findings, and those consultations were discussed in section 4.11.1.1 the EIS. We provided the ACHP two opportunities to comment on the undertaking: once when we sent the ACHP our finding of adverse effects, and again when we filed our MOA for the Project with the ACHP. On August 24, 2011, Robert Garcia, Chair of the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians signed the MOA as a concurring party. The MOA outlines future steps for surveying areas not yet inventoried, and conducting evaluations, in a phased manner.

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eligible for listing in the National Register of Historic Places. The effects determinations should be made through the Federal process which allows the State Historic Preservation Office to comment on and concur with as well as affording the Advisory Council on Historic Preservation an opportunity to comment.

NA2-5
Conf

The Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians are requesting an MOU with both the Jordan Cove LNG and the Pacific Connector Pipeline be completed prior to project implementation. Further consultations with FERC, JCEP, and Pacific Connector Pipeline should include appropriate revisions and updates to the Unanticipated Discovery Plan; including appropriate handling of NAGPRA objects.

NA2-6

Conclusion

In conclusion, we encourage FERC to include revisions to support stronger cultural resource protection through more studies, monitoring, cooperation, development Unintended Discovery Plan, and cooperative agreements with the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians. We are interested in consulting with FERC during the development of cultural and natural resource mitigation measures to ensure protection of Tribal resources.

NA2-7

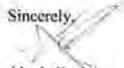
Fish, wildlife, plants and their habitat are important cultural resources of the Tribes. Impacts to those resources affect our health, our culture and our unique indigenous way of life. We encourage FERC to take seriously the concerns of the Confederated Tribes, other impacted Tribes and federal agencies like U.S. Fish & Wildlife Service, NOAA in addressing the impacts to our natural resources.

NA2-8

The Tribes have lived along the Coos Estuary and Coastal Watersheds since Time Immemorial, understand the natural hazards associated with this shoreline, and know that hazards which recur at the intervals of centuries are not dim distant threats but are events in the Tribes' recent history and certain future. We know that projects subject to these hazards may only be allowed if all due consideration is given to these hazards and to the Tribes subject to the effects of these hazards on facilities such as those proposed under these dockets.

NA2-9

Thank you for your attention to the concerns of the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians.

Sincerely,

Alexis Barry
Tribal Administrator

NA2 Continued, page 3 of 3

NA2-6 The EIS included a recommendation that Jordan Cove complete a MOU with the tribe prior to construction (see Recommendation 36 in section 5.2 of the EIS). The tribe was sent a copy of the Unanticipated Discovery Plan and has not commented on that plan back to the FERC.

NA2-7 As noted on pages 4-859, 4-860, and 4-873 of the DEIS the Project will not be allowed to begin construction until all agreements with consulted Indian tribes and other agencies as well as an HPMP have been completed. An Unanticipated Discovery Plan for Jordan Cove has been finalized, as of August 2013 after receiving comments from consulted tribes. The Unanticipated Discovery Plan for Pacific Connector will be finalized pending incorporation of comments received from the SHPO in August 2013. (See Section 4.11.4 on page 4-872 of the DEIS.)

NA2-8 Comment noted.

NA2-9 The land-managing agencies (the BOR, BLM and Forest Service on federal land) and the State regulate industrial operations during periods when fire risks are high. The DOT sets safety standards that also reduce the risk of pipeline-related fires. Also see the Draft Emergency Response Plan in the POD. Natural hazards, such as earthquakes, are addressed in section 4.2 of the EIS. .

20141224-4003 FERC PDF (Unofficial) 12/24/2014

1

PM1

PUBLIC MEETINGS

PM1 Public Meeting, Malin, OR, December 13, 2014

1 BEFORE THE
2 FEDERAL ENERGY REGULATORY COMMISSION
3 ----- x
4 IN THE MATTER OF: : Project No.
5 JORDAN COVE - PACIFIC CONNECTOR : CP13-483-000
6 PIPELINE PROJECT : CP13-492-000
7 ----- x
8
9 Malin Community Park Hall
10 2307 Front Street
11 Malin, OR 97632
12
13 Saturday, December 13, 2014
14 The above-entitled matter came on for technical
15 conference, pursuant to notice, at 6:00 p.m., Paul Friedman,
16 the moderator.
17
18
19
20
21
22
23
24
25

1 PROCEEDINGS

2 (6:00 p.m.)

3 MR. FRIEDMAN: On behalf of the Federal Energy
4 Regulatory Commission, which I abbreviate F-E-R-C, or FERC
5 or Commission, and our federal cooperating agency partners,
6 I would like to welcome you tonight to this public meeting
7 to take comments on the draft environmental impact statement
8 or DEIS issued by the FERC on November 7th, 2014 for the
9 Jordan Cove Liquefaction Pacific Connector pipeline projects
10 which are abbreviated as the project.

11 My name is Paul Friedman and I'm the FERC
12 environmental project manager for this project. Here with
13 me tonight also from the FERC is Steve Busch. He's the
14 assistant FERC project manager.

15 Next to Steve is Miriam Liberatore, she is the
16 project manager for the BLM. Right here on my right, your
17 left is Wes Yamamoto. He is the project manager for the
18 Forest Service. There hiding in the back is Christian
19 Hyatt, she is the project manager for the Bureau of
20 Reclamation.

21 Also here with us tonight are our contractors in
22 that room are the Johns. John Crookston and John Scott,
23 they work for a company called Tetra Tech which is a
24 third-party contractor. And they helped us produce the
25 DEIS.

1 Also I think in the room is Mike Huff, he's with
2 a company called North State Resources. They're the
3 third-party contractor working for the Forest Service and
4 the BLM.

5 As you can see, I have a court reporter recording
6 everything you say tonight so that there will be an accurate
7 rendering in the public record of what is said.

8 Let the record show that this meeting began at
9 approximately 6 p.m. on Saturday, December 13th, 2014 at the
10 Malin Community Center.

11 The court reporter is an employee of Ace Federal
12 Reporters, Inc., an independent contractor. Ace will sell
13 you copies of the transcript at various sliding scale prices
14 beginning from same day to five business days after this
15 meeting.

16 If you would like a copy of the transcript prior
17 to it being posted on the FERC website, you must make
18 arrangements directly with ACE. If you would like to speak
19 tonight, all you have to do is go in and find the Johns and
20 they have a speakers list.

21 I will call people up in the order in which they
22 signed the list. And I merely ask you to print your name
23 legibly so I can try and read it, but more often than not I
24 butcher it anyway.

25 The production of the DEIS was a collaborative

1 effort involving a number of federal cooperating agencies,
2 including the BLM, Forest Service, Corps of Engineers,
3 Department of Energy, EPA, Coast Guard, Fish and Wildlife
4 Service, The Bureau of Reclamation and Department of
5 Transportation.

6 The cooperating agencies had an opportunity to
7 review an administrative draft and some agencies contributed
8 text to the DEIS. For example, the BLM and Forest Service
9 and their third-party contractors, West State Resources,
10 wrote the sections of the DEIS related to their evaluation
11 of proposed amendments to the individual district or
12 national forest, land management plans, to make provision
13 for the pipeline.

14 In a few minutes the representative of the BLM
15 and the Forest Service, will explain their agencies'
16 actions. One thing that Miriam will say that I think we
17 need to repeat more often is that these public comment
18 meetings are for both the FERC action and the BLM actions
19 and the Forest Service actions and the Reclamation actions.
20 We are working together. We produced one joint DEIS, and
21 these meetings that we've been holding all week in southern
22 Oregon are to take public comments on all of the agencies'
23 actions together.

24 The FERC is an independent federal agency that
25 regulates, among other things, the interstate transmission

1 of natural gas. Originally we were called the Federal Power
2 Commission when we were created by Congress in 1920. We
3 were renamed and reorganized under the Carter
4 administration.

5 The decisionmakers at my agency are called the
6 Commissioners. There are five of them. They sit on the
7 11th floor of my building. They are appointed by the
8 President of the United States and they are confirmed by
9 Congress. Steve and I were not appointed by the president.
10 We are mere civil servants. We call ourselves staff and
11 staff makes recommendations to the Commissioners who are the
12 decisionmakers.

13 Our recommendations can be found in Section 5.2
14 of the DEIS.

15 In accordance with the Energy Policy Act of 2005,
16 and the Natural Gas Act, the FERC is the lead federal agency
17 responsible for authorizing on-shore liquefied natural gas
18 or LNG terminals and interstate natural gas transmission
19 facilities. We're also the lead agency for compliance with
20 the National Environmental Policy Act of 1969 which everyone
21 abbreviates as NEPA.

22 Our DEIS was prepared to satisfy the Council on
23 Environmental Quality's regulations for implementing the
24 NEPA. The federal cooperating agencies can adopt our EIS
25 for their regulatory needs and to comply with the NEPA.

1 Pacific Connector gas pipeline filed its
2 application with the FERC in docket number CP13-492-000
3 under Section 7 of the NGA on June 6, 2013.

4 Pacific Connector seeks authority to construct
5 and operate a 230-mile long, 36-inch diameter, underground,
6 welded-steel transmission pipeline between the Malin and the
7 Jordon Cove terminal at Coos Bay.

8 The pipeline route would cross portions of
9 Klamath, Jackson, Douglas, and Coos Counties. Also near
10 Malin, Pacific Connector would connect to existing pipeline
11 systems that are owned by Gas Transmission Northwest, or
12 GTN, and Ruby Pipeline, which we abbreviate as Ruby, which
13 will provide natural gas produced in western Canada and the
14 Rocky Mountains.

15 For full disclosure Ruby is partly owned by one
16 of the partners in both Pacific Connector and Jordon. GTN
17 is owned by a company called TransCanada.

18 The Pacific Connector Pipeline would have a
19 design capacity of 1.07 BCF a day with 0.04 BCF a day
20 dedicated delivery to the existing Northwest Pipeline Grants
21 Pass Lateral to serve customers in southern Oregon. Again,
22 for clarification, Northwest is owned by one of the partners
23 of Pacific Connector.

24 Other facilities associated with the Pacific
25 Connector project include a 41,000 horsepower compressor

1 station near Malin, two receipt meter stations for GTE and
2 Ruby within the compressor station tract, the Clarks Branch
3 delivery station at the interconnection with Northwest, a
4 delivery meter station at Jordon Cove, five pig launchers
5 and receivers, 17 mainland block valves and 11 communication
6 towers.

7 Jordon Cove would receive its supply of natural
8 gas from the Pacific Connector Pipeline, therefore although
9 these are two separate applications with the FERC, we have
10 combined them as connected actions and evaluated the
11 environmental impacts of both Pacific Connector and Jordon
12 Cove together in one comprehensive DEIS.

13 The two companies also share some ownership
14 overlap.

15 I would like to make it very clear that this
16 project is being proposed by two private companies. The
17 companies came up with the design and location for their
18 facilities. And it's the FERC's job to analyze the
19 environmental impacts associated with the construction and
20 operation of those facilities in our DEIS. The FERC is not
21 an advocate for the project. The FERC is an advocate for
22 the environmental review process.

23 The Commissioners will make their own independent
24 decision about whether or not this project has any public
25 benefits and would be in the public interest.

1 During our review of the project, we assembled
2 information from a variety of sources including the
3 companies' applications and their responses to our data
4 request questions, public input, data provided by other
5 federal, state, and local resource agencies, and our own
6 research. Our analyses can be found in our DEIS.

7 We sent copies of our DEIS out to our
8 environmental mailing list which included elected officials,
9 federal, state, and local agencies, regional environmental
10 groups, and nongovernmental organizations, affected
11 landowners, Indian tribes, commenters, and other interested
12 parties, local newspapers and libraries, and parties to the
13 proceedings. Paper copies were only sent to those who
14 requested them in advance in response to our notice of
15 intent. All others received a compact disc or CD version.
16 Anyone who received a copy of the DEIS will also be sent a
17 copy of the FEIS. You do not have to sign up again.

18 However, if you did not receive a copy of the
19 DEIS and you want to be sent a copy of the FEIS, please go
20 to see the Tetra Tech team in the back and sign up on our
21 environmental mailing list. You can also use that list to
22 request a hard copy of the FEIS if you only got a CD of the
23 DEIS. We have no more copies in hardbound of the DEIS.

24 About 72 miles of the Pacific Connector pipeline
25 route would cross federal lands including 40 miles of BLM

1 land, 31 miles of Forest Service Land and less than a mile
2 of Reclamation land.

3 At this point I'd like Miriam Liberatore who
4 represents the BLM and the Forest Service to explain those
5 agencies' actions with regard to this project.

6 MS. LIBERATORE: Thanks, Paul. Good evening,
7 everybody. Thanks for coming.

8 I represent the BLM, I'm with the Medford
9 District and I've been there about 13 years.

10 The BLM and the Forest Service have involvement
11 in this project where the pipeline crosses federal lands.
12 As Paul mentioned, the BLM, the Forest Service lands and the
13 facilities administered by the Bureau of Reclamation.

14 We do not have any involvement in the LNG plant
15 in Coos Bay, and we have no involvement in the pipeline
16 where it crosses over private lands.

17 But we have decisions to make with regard to
18 where the pipeline does cross our lands, and those have to
19 do with the issuance of a right-of-way grant and with the
20 proposed amendments to our land management plans. And I'm
21 going to talk to you about both.

22 As it's proposed in the draft EIS the project
23 would cross federal lands and to do that it needs a
24 right-of-way grant just the same as any individual would to
25 get a driveway up to your house.

1 The agency responsible for considering the grant
2 application is the BLM. And we get that authority from the
3 Mineral Leasing Act of 1920. So the project has applied to
4 the BLM for a grant and we would make the decision to grant
5 or deny it and the Forest Service and Reclamation would give
6 us their concurrence or not with our decision.

7 We have made no decision with respect to the
8 right-of-way grant application and we won't make a decision
9 until after the FEIS comes out and after other conditions we
10 need to make our decision have been met.

11 So the pipeline, if constructed, would not
12 conform to the existing land management plans that the BLM
13 and Forest Service use now. These are on the districts
14 for the BLM, this is on the Coos Bay District, the Roseberg
15 District, the Medford District and the Klamath Falls
16 resource area of our Lake View District. For the Forest
17 Service that's on the Umpqua National Forest, the Red River
18 National Forest, and the Winema National Forest.

19 Those plans in order to even be able to consider
20 the right-of-way grant, those plans would need to be amended
21 so that the project could conform to the plans.

22 We have proposed 20 amendments in this draft EIS
23 that would do just that. There are four proposed amendments
24 for the BLM, 15 for the Forest Service, and one joint
25 amendment for both agencies. They address issues having to

1 do with our survey and managed guidelines, habitat retention
2 for the Northern Spotted Owl and for the marbled murrelet
3 and for environmental conditions having to do with soils,
4 with visual quality objectives, with riparian areas, and we
5 have a proposal to convert some of our matrix lands which is
6 where we have our timber base over into Lake Sisenal
7 reserves category to make up for the LSRs that -- we call
8 them LSRs, to make up for the LSRs that would be crossed by
9 the pipeline footprint.

10 The decisions we need to make require us to use a
11 NEPA process. And as Paul mentioned, the NEPA process that
12 we're using is FERC's. We are cooperating agencies to FERC
13 in this entire EIS process. So any comments that the public
14 has about our actions need to be made through FERC's process
15 which Paul will describe in detail.

16 And just like with the right-of-way and with
17 FERC, we have not made any decisions at this point about the
18 land plan amendments either. And, again, those would not be
19 made until after the final EIS comes out and after other
20 conditions we need have been met.

21 So I just want to thank you again for taking the
22 time and trouble to come out tonight. We do want to hear
23 what you have to say and we're looking forward to hearing it
24 tonight.

25 Thank you.

1 MR. FRIEDMAN: Thank you, Miriam. We are now at
2 the beginning of a 90-day period for taking comments on the
3 DEIS. Comments can be filed with the Commission up until
4 February 13th, 2015. The FERC keeps the consolidated record
5 for these proceedings, so please, do not send your comments
6 to the BLM and the Forest Service. Also do not send me
7 personal e-mails. There is an organization out there who is
8 on purpose misinforming the public to send me e-mails. What
9 that does is prevents those comments from getting into the
10 record and prevents the FERC from considering them.

11 So instead of doing what that organization says,
12 do what we said in our notice of availability. It's all
13 spelled out in that notice. That notice is available on the
14 Internet for anyone to see. I'm going to summarize what it
15 says, but in case you want to see it in writing, all right,
16 the notice of availability is in our e-library. And the way
17 you get there is to go to WWW.FERC.gov click on documents
18 and filings, click on e-library and go to November 7th, 2014
19 under the docket numbers CP13-483 or CP13-492, and you can
20 see the notice of availability. And everything I'm going to
21 say now in narrative is in there so that there can be no
22 mistake about the process we want the public to use to
23 comment on this proceeding.

24 Once you go to our website, you can find the
25 e-comment feature and you can comment that way. Second, you

1 can also use the e-filing feature on the FERC web page.

2 Third, you can write a letter to the Secretary of
3 the Commission at 888 First Street, Northeast, Washington,
4 D.C. 20426. Remember to always mark your comments with the
5 docket numbers CP13-483-000 for Jordan Cove, and
6 CP13-492-000 for Pacific Connector.

7 Lastly, you can give oral comments tonight. Your
8 comments tonight will be recorded by the court reporter and
9 those transcripts from this meeting will go into the public
10 library at -- will go into the public record at e-library.
11 All comments received whether written or oral will be given
12 equal weight by the FERC staff and will be addressed in our
13 final EIS. It does not matter if your comments were
14 submitted the first day that the EIS was issued, on November
15 7th, or are received on the last day for comments on
16 February 13th, 2015.

17 While the purpose of tonight's meeting is to take
18 verbal comments on the DEIS, given the limited time each
19 presenter will have at this forum, I urge you to send in
20 more detailed comments to the FERC either electronically or
21 in writing. The more specific your comments, the better we
22 can address your concerns.

23 Comments such as I am in favor of the project or
24 I am against the project are not particularly helpful. This
25 is not an election and it's not a popularity contest.

1 Instead, we want comments just to focus on the environmental
2 issues raised in the DEIS.

3 After the comment period ends on February 13th,
4 2015, the FERC staff and our third-party contractor together
5 with the federal cooperating agencies will review the
6 comments and address them in the FEIS. The FERC will issue
7 a revised notice of schedule in the very near future that
8 will present a new date for the issuance of the FEIS and a
9 90-day period for other federal authorizations.

10 Again, no decision about approving or not
11 approving the project has been made at this time. The EIS
12 is not a decision document.

13 The Commissioners will consider the findings in
14 the EIS together with all other non-environmental factors
15 such as markets, rates, and tabs before they make their
16 decision about whether or not to authorize the project. If
17 the Commissioners authorize the project in an order, only
18 parties to the proceeding known as intervenors may legally
19 question that decision.

20 The FERC's requirements for filing a motion to
21 intervene can be found under Title 18 Code of Federal
22 Regulations Part 385.124. While the period for filing a
23 motion to intervene has passed, the Commission will consider
24 requests for late intervention with good cause. Typically
25 affected landowners and those with legitimate environmental

1 concerns who cannot be represented by another are considered
2 to have good cause for intervention.

3 However, simply filing a comment will not give
4 you intervenor status. But you do not need to be an
5 intervenor to have your environmental comments considered.
6 An intervenor may seek rehearing of the Commission's orders
7 and all of the things I just said are also in our notice of
8 availability.

9 If the Commission authorizes the project,
10 construction may not begin until after Jordan Cove and
11 Pacific Connector obtain all other necessary federal permits
12 and approvals. At a minimum, this includes a biological
13 opinions from the Fish and Wildlife Service and the National
14 Marine Fishery Service under the Endangered Species Act.

15 A right-of-way grant for the Pacific Connector
16 pipeline issued by the BLM under the Minerals Leasing Act
17 with concurrence from the Forest Service and Reclamation.
18 Permits issued by the Corps of Engineers under Section 10 of
19 the Rivers and Harbors Act, and Section 404 of the Clean
20 Water Act. A water quality certification under Section 401
21 of the Clean Water Act issued by the Oregon Department of
22 Environmental Quality, permits under the Clean Air Act
23 issued by the ODEQ, and a determination by the Oregon
24 Department of Land Conservation and Development that the
25 project would be consistent with the Coastal Zone Management

1 Act.

2 In addition, the Energy Facilities Citing Council
3 of the Oregon Department of Energy must approve the proposed
4 South Dune Power Plant associated with the Jordan Cove
5 terminal.

6 Jordan Cove and Pacific Connector must document
7 that all preconstruction conditions of the FERC's order have
8 been met before we would allow construction to begin.
9 Construction activities would be monitored by the FERC staff
10 and the federal land managing agencies.

11 Now, is the part of the meeting you've all been
12 thirsting for, where you the public get to speak. I remind
13 you the purpose of this meeting is to hear public comments
14 on our DEIS. In general, I will not be responding to your
15 comments tonight unless you ask an administrative question
16 that I might know the answer to. Otherwise I will just be
17 listening.

18 We will address your comments in the final EIS
19 after we do the appropriate research.

20 So here are the ground rules for tonight's
21 meeting. After I call your name, please come to the podium
22 and speak clearly. You're going to have to speak loud
23 because we have no microphones today, but this is a
24 recording device. So, please don't cover it with your
25 papers when you get to the podium.

1 Identify yourself and spell your name for the
2 court reporter. If you represent an organization, state the
3 name of that organization. If you are a landowner along the
4 pipeline, provide us with the approximate milepost of your
5 property or an address or cross streets.

6 If you have a written summary of your comments,
7 please give them to the Tetra Tech team at the back of the
8 room and they'll make certain it gets into the public
9 record.

10 My number one rule is please show respect to all
11 speakers regardless of whether or not you agree with them or
12 not. Please no cheering and absolutely no booing.

13 Lastly, because of the large number of people
14 we've had speak at other meeting we are limiting everyone to
15 just three minutes so that we can everyone who wants to
16 speak have an opportunity.

17 Steve has this piece of paper with a yellow sign
18 he will show you at two and a half minutes, and a red sign
19 at three minutes. And at that point we'd like you to stop
20 talking and allow the next speaker to speak instead.

21 The first person on my speakers' list is George
22 Logan, better known as Frank.

23 MR. LOGAN: Yeah, my name is George Logan,
24 L-o-g-a-n, G-e-o-r-g-e, and I represent Local 29, Iron
25 Workers. They cover all of Oregon, part of the southern

1 part of Washington State.
2 I'm here tonight to support the pipeline as
3 everybody else here too if they go out and get in their car
4 and turn it on and drive home and flip on their light
5 switch, and use any kind of energy at all, sometime -- I
6 have propane at my house, but just about every town in the
7 United States has gas lines running all over them. So we
8 know they're safe, they're tried and true. Very rarely do
9 you hear about them blowing up or having any mishaps. And
10 if you even smell something, there are the gas people right
11 on time coming to your house straightening everything out
12 for you and checking everything. So it's a wonderful clean
13 method of energy.

14 I personally worked on the turbines and
15 generators on this power plant in Klamath Falls. We're
16 looking out for everyone's interest with the environment and
17 I'm sure everybody on the dais is too. So you can feel very
18 comfortable about having a pipeline come through this area.
19 And one of the other good things I hadn't mentioned before
20 is the swatch they do need to cut will create a nice fire
21 break on through the forest to where it will save the forest
22 during lightning storms and whatnot for fires that we often
23 have.

24 That's about it. Thanks everybody for putting up
25 with me for the last week. I appreciate everybody and safe

PM1-1

PM1-2

PM1 Continued, page 19 of 51

PM1-1 Comment noted.

PM1-2 The DEIS addresses impacts from fire in sections 4.5.1.2 and 4.9.2.6. Pacific Connector has produced an Emergency Response Plan, a Fire Prevention and Suppression Plan, and a Safety and Security Plan. We will add into the FEIS the fact that the pipeline corridor, after construction and during operation, would act as a fire-break in forested areas.

1 trip going home, folks.

2 Thank you.

3 MR. FRIEDMAN: Thank you for your comments.

4 (Applause.)

5 MR. FRIEDMAN: Albert Devita.

6 MR. DEVITA: Good evening, Albert Devita,

7 D-e-v-i-t-a. I'm a 33-year member of the laborers, member
8 of Local 296, I'm also the training director for the
9 laborers statewide. We have an apprenticeship program. And
10 our trade would be one of several trades working on the
11 proposed projects. We have, like all the trades, we have
12 apprenticeship programs, all these programs put a high
13 degree on safety because it's our members and we want to
14 protect them. And all the trades have environmental safety
15 training.

16 I've worked on pipelines. I've also been around
17 pipelines as a curriculum developer. And my experience is
18 that the pipeline contractors that build these projects put
19 a high degree on safety and environmental issues. Nobody
20 ever goes off the right-of-way, if they do, they're fired.

21 Everybody on the job is trained. Everybody in
22 our trade is trained in pipeline safety and any other
23 environmental issues that may come.

24 So as far as safety goes and environmental issues
25 created by the construction, the people that are doing the

1 work are well trained.
2 The other thing I mentioned is that I represent
3 an apprenticeship program. And it is the future of our
4 industry and so that's why we support apprenticeship along
5 with all the other trades. But it is also a way to put
6 young people to work. This job may employ up to 1,000
7 laborers. A lot of them are going to be local people. A
8 lot of those people are going to come into the trades for
9 the first time and learn the industry. And they'll work on
10 good family wage jobs with benefits and the country needs
11 more of that. So, I urge you to pass -- get your approval
12 quickly. Thank you.
13 MR. FRIEDMAN: Thank you for your comments.
14 Next is Carol Dyer.
15 (Applause.)
16 MR. FRIEDMAN: Speak loudly.
17 MS. DYER: I can. Proper pronunciation of my
18 name, my name is Carol Dyer, D-y-e-r.
19 MR. FRIEDMAN: Thank you for correcting me.
20 MS. DYER: I have traveled from Orleans,
21 California to present these comments and witness the FERC's
22 public comment hearings in Medford, Plymouth Falls, and
23 Malin, Oregon.
24 I represent the Klamath River Keeper. I will
25 include process analysis and detailed written comments on

PM1-3

PM1-3 The Commission's Order will disclose whether or not this Project is authorized.

1 behalf of the Klamath River Keeper and our 3,000 members.
2 I would like to join the many others who have
3 requested that the FERC extend the public comment period for
4 these complex projects beyond the 90 days. Additional time
5 is needed so that all parties, including native American
6 tribal members, impacted property owners, NGOs, and others
7 have adequate time to closely review all the 400 proposed
8 stream crossings, impacts on forest health and soils,
9 threatened and endangered species, cultural resources
10 including burial sites along the pipeline route and impacts
11 to local residents.

12 I would also like to formally request that the
13 FERC examine and attempt to justify the substantial increase
14 in greenhouse gas emissions that would result from the
15 construction and operation of these new proposed fossil fuel
16 energy infrastructure projects, the transport of liquid
17 natural gas to prospective Pacific rim markets and result in
18 burning at power plants.

19 Klamath River Keeper is concerned about
20 substantial harm to endangered Klamath Shanook Salmon who
21 reside downstream from the proposed Pacific Connector
22 pipeline. But our comments will weigh the findings of the
23 National Marine Fisheries Biological opinion which may not
24 be released during the one-year clock.

25 The published EIS is inadequate for its exclusion

PM1-4

PM1-5

PM1-6

PM1 Continued, page 22 of 51

- PM1-4 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.
- PM1-5 The applicant would replant land within the temporary right-of-way based on landowner/land manager direction. It would be up to the private land owner to determine how their forest land would be replanted. In areas where private land is reforested, the OFPA requirement would apply. However, this section only addressed federal lands (e.g., Section 4.5.2.3 is titled "Environmental Consequences of Timber Extraction on Federal Lands"); impacts and measures on private lands are discussed in the previous "non-federal" sections.
- PM1-6 The Project does not include drilling for natural gas using hydraulic fracturing methods (or "fracking"). Exploration and production of natural gas are not activities regulated by the FERC. See section 1.4.4 of the DEIS.

PM1 Continued, page 23 of 51

1 of impacts of accelerated hydraulic fracturing operations
 2 necessary to supply the natural gas. Hydraulic fracturing
 3 to release natural gas has been known to cause severe harm
 4 to endangered species, aquifers, the public health, economic
 5 stability, property rights, public land management, and
 6 cultural resources. Water quality certification for these
 7 complex fossil fuel projects should not only include the
 8 pending Army Corps of Engineers 404 Clean Water Act and the
 9 Oregon State 401 certification under the Clean Water Act,
 10 any approval for this project should also require adequate
 11 consultation and oversight from the California Water Quality
 12 Control Board, the Kuruk and Hoopa Tribal Water Quality
 13 Departments and any other government agency downriver from
 14 the proposed pipeline and fossil fuel infrastructure.

PM1-8
Cont'd

15 I plan to contact all relevant tribes and
 16 agencies and urge them to participate in this process.

17 Alarming water issues includes the use of water
 18 in the pipeline's construction, operation, and emergency
 19 response. With water scarcity a top priority for all
 20 regional governments, public utilities and citizen's extreme
 21 water usage for this project should not be allowed.

PM1-7

PM1-8

22 As the united front, landowners, tribal members,
 23 river advocates, clean energy advocates, local, regional and
 24 national environmental justice organizations, scientists and
 25 other thought leaders will demonstrate that this project

PM1-7 The Project is in Oregon; not California. Therefore, permits are not needed from the California Water Quality Control Board. Nor do we need to consult with the Kuruk and Hoopa tribes, because they are located in California, and these tribes do not claim ceded lands in the project area. Affected Tribes have been contacted and consulted regarding this process (see chapter 1 and section 4.11 of the DEIS).

PM1-8 Impacts on surface waterbodies crossed by the pipeline route are discussed in section 4.4.2.2 of the DEIS.

1 will not serve the public interests and violates the Clean
2 Water Act and Endangered Species Act, and other laws.
3 MR. FRIEDMAN: Thank you for your comments.
4 Next is John Ward.
5 (Applause.)
6 MR. WARD: Thank you very much for coming to
7 Klamath. The correct spelling of my name is J-o-h-n,
8 W-a-r-d. I'm here representing the Road to Fly Fishers and
9 specifically would like to formally request an extension --
10 a 30-day extension to the comment period provided by FERC so
11 that we can provide more informed and detailed analysis of
12 the environmental impacts or issues from the Jordan Cove
13 Pacific Connector project described in the draft EIS.
14 It's very extensive. It's not the only thing
15 that's up for concurrent review but are disassociated from
16 this project, but it's a very busy time in commenting on
17 three actions at this point and the additional time would
18 make it, I think, better to provide informed information for
19 you folks.
20 That's it. Thank you.
21 MR. FRIEDMAN: Thank you for your comment.
22 The next speaker is Gary Jackson.
23 MR. JACKSON: Hi, I'm Gary Jackson. I am
24 business representative for the laborers union Local 296 out
25 of Medford. Jackson is spelled J-a-c-k-s-o-n.

PM1-9

PM1-9 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

1 Anyway, I'd like to just talk a little bit about
2 this thing. As far as the job opportunities, there's going
3 to be close to 3,500 people employed on this job between the
4 Coos Bay site and the pipeline itself. I represent close to
5 800 to 1,000 of those people, myself and some other laborer
6 business reps. That's a lot of work for our trade. I've
7 heard a lot of talk about these trades that are -- these
8 jobs being temporary. Yeah, they're temporary for some
9 people. For us a two to four year job is a long term job.
10 We make our living doing these temporary jobs.

11 Once this project is complete, there's going to
12 be approximately 900 full-time times come out of these.
13 About 700 of them will be indirect jobs in the Coos Bay area
14 another 150 will be full-time jobs at the facility and
15 another 50 of them are going to be people that are going to
16 be employed by Jordan Cove for emergency responses, tug boat
17 drivers, and that type of thing.

18 As far as the science that's going into this
19 thing, I hear a lot of talk about the science that is
20 opposing this. And I really have to question that. I've
21 been on the wrong end of the science spectrum more than
22 once, the cutthroat listing was one. The dreaded spotted
23 owl was another one. I don't think the science was quite
24 accurate on that. I think it was kind of swayed. It's
25 quite possible the science they're using now can be swayed.

1 And there is a happy medium that can be struck there, I do
2 believe. But that's something you've just got to look into.

3 As far as the safety aspects of this thing goes,
4 it's a very well-engineered project now. These engineers
5 that they're using with all the models and stuff they're
6 using, they can predict a lot of things. What I've seen in
7 this industry pretty much everything we do is overbuilt,
8 it's over engineered. I don't think there's a huge concern
9 about this thing blowing up. As far as the 9.5 tidal wave
10 that's supposed to hit, in my opinion, if that thing hits,
11 nobody is going to be around to see what's going to happen
12 with that anyway. But, again, that's my opinion.

13 A reference was just made about the Indian tribes
14 going to be affected by this. Okay, I'll hurry.

15 Not all Indian tribes at this point have made a
16 decision on the support of this project. I can tell you
17 that. I know this for a fact because I am an enrolled
18 member of a nationally recognized Indian tribe.

19 Anyway, with that I'll close. Thank you.

20 MR. FRIEDMAN: Thank you.

21 (Applause.)

22 MR. FRIEDMAN: The next speaker is Clarence

23 Adams.

24 MR. ADAMS: Clarence Adams, C-l-a-r-e-n-c-e, I'm
25 with Landowners United and I'm also an affected landowner,

PM1 **Continued, page 27 of 51**

1 milepost 55.8.

2 All this week we have heard about jobs. And
3 we're not opposed to jobs, but I have heard such a wild
4 swing of numbers of jobs that is actually difficult to even
5 argue the point. We know there's job, we just don't know
6 how many.

7 So I would propose that the final EIS, Jordan
8 Cove and Pacific Connector actually make an attempt to list
9 the number of permanent jobs that actually mean something to
10 the economy on a long-term basis, not the transients that
11 come through and work for a while and then leave. To me,
12 that way, we could all have some equal footing to talk
13 about.

14 And then on a more personal level, this week I've
15 stated facts, figures, quoted the gospel, and to me
16 personally on my property, we've been on the ground 22
17 years, we have watched trees along the creek grow, we have a
18 small corner of timberland that we have harvested trees off
19 of. We use it for poles for building material, firewood,
20 that whole corner would be wiped out completely. That may
21 not seem like a significant loss to everybody, but it is a
22 big loss to us. I would hate to see that go. This project
23 does not consider aesthetics like that. There is no mention
24 of beauty, the natural beauty of the woods its traversing
25 and I don't know how to quantify that, but I believe the

PM1-10

PM1-11

PM1-10

Section 4.9 of the DEIS addresses the jobs (both permanent and temporary) that would be created by this project. The impact to the economic conditions of the area are also addressed in section 4.9 of the DEIS.

PM1-11

The visual impacts of the Project are addressed in section 4.8.2 of the EIS.

1 attempt should be made.

2 Thank you.

3 MR. FRIEDMAN: Thank you for your comments.

4 Next is Chuck Little.

5 MR. LITTLE: Chuck Little, C-h-u-c-k L-i-t-t-l-e.

6 I guess I am one of those transients that was just referred
7 to. In 1992 I came down to Klamath Falls to work on the
8 TransCanada line which is a 42-inch gas line that starts in
9 Canada and comes all the way down to California. It runs to
10 a station that's probably about two miles from this site.
11 Went by there today.

12 In 1993, I was still working on that line and in
13 that year I worked eight months and made \$48,000 which in
14 '93 was quite a bit of money. Still a lot of money these
15 days too. The safety is very important on those lines.
16 There's a whole crew that is dedicated to doing nothing but
17 environmental stuff like putting up the silt fence, the hay
18 bales, everything to keep everything out of the streams,
19 everything like that.

20 Once the pipeline is in the ground, by FERC
21 regulations they have to test it ever so many years. Right
22 now I work for Laborers Local 121 as a dispatcher as one of
23 my job duties. And on a regular basis I dispatch people out
24 to companies that do that testing. So I think as far as
25 safety goes, the pipelines are proven safety. FERC makes

PM1-11
Cont'd

1 sure that they do the environmental stuff right. They make
2 sure that it gets tested on a regular basis. And I kind of
3 wish some of the landowners would maybe talk to some of the
4 landowners in this region that have that pipeline running
5 through their ground so that they know how they were
6 treated, what they do to maintain that, and all that stuff.
7 But I am in full support of this project.

8 As far as the extension on the comment period,
9 this project has been around for almost ten years now, 90
10 days, I think, is sufficient. I don't see why adding
11 another 30 days would do anything. I think if people are
12 going to comment, 90 days is a long enough period for that
13 comment period.

14 Thank you very much.

15 MR. FRIEDMAN: Thank you.

16 (Applause.)

17 MR. FRIEDMAN: Thank you for your comment.

18 Next is Ed Lynch.

19 MR. LYNCH: Yes, my name is Ed Lynch. I'm a
20 landowner and I'm against this 100 percent. I think this is
21 just more government tyranny. As far as safety, all you got
22 to do is just look on the news every now and again.

23 MR. FRIEDMAN: Thank you for your comment.

24 (Applause.)

25 MR. FRIEDMAN: The next speaker is Linda Lynch.

PM1-12

PM1-13

PM1-14

PM1 Continued, page 29 of 51

PM1-12 Comment noted. DOT sets safety standards for pipelines. Section 4.13 of the DEIS discussed pipeline safety.

PM1-13 Comment noted.

PM1-14 Comment noted.

1 MS. LYNCH: Hello, my name is Linda Lynch,
2 L-y-n-c-h. I am co-landowner with my husband Edward Lynch
3 at 32330 Transformer Road here in Malin. I am in total
4 opposition to this gas pipeline coming through our property
5 with or without our permission. Coming down from Canada,
6 another country even, it's in total violation of American
7 human rights. Total.
8 That's all I have to say.
9 MR. FRIEDMAN: Thank you for your comments.
10 (Applause.)
11 MR. FRIEDMAN: Next is Frank -- maybe it starts
12 with an O. Is there a Frank here?
13 MR. DIAZ: Diaz?
14 MR. FRIEDMAN: Yes. Diaz.
15 MR. DIAZ: My name is Frank Diaz and we have
16 property up in Dozhollow north of Merrill and I'm not sure
17 of exactly the number of milepost on the pipeline, but
18 anyway, we got a 200-acre alfalfa field there and then we
19 bought 200 acres more a few years back with the intention
20 of, you know, subdividing it. And with this pipeline going
21 through it's going to devalue the ground down quite a bit.
22 I don't know how people would feel about building a house in
23 an area next to a pipeline.
24 And what they are offering right now for us is
25 basically they're wanting to go through almost for free, you

PM1-15

PM1-16

PM1 Continued, page 30 of 51

PM1-15 Comment noted.

PM1-16 Impacts on landowners whose property would be crossed by the pipeline route, including effects on property values, are discussed in section 4.9.2.3 of the DEIS.

1 know, 3,000, \$3,500 something like that. And I asked them
2 when they first started going to put that is line in when
3 Glen Smith come down, they couldn't move it across the road
4 on the other side to get it off our property, but they
5 didn't seem to want to do that.

6 Anyway, that's probably about all I have to say
7 about it. Thank you.

8 MR. FRIEDMAN: Thank you for your comments.

9 (Applause.)

10 MR. FRIEDMAN: We're thinking it's Diana Bustos.

11 MS. BUSTOS: My name is Diana Bustos,
12 B-u-s-t-o-s, and I'm a landowner here in Malin. I'm totally
13 100 percent against this pipeline. I'm sitting here
14 listening to several people about the jobs and how it will
15 help the community and I'm not against that. But what I am
16 against is the fact that you're taking over our land, you're
17 not giving us the right, you're going to come in with a
18 right-of-way and I don't think that's right.

19 This pipeline is going to make millions, but it's
20 okay for them to do that, but they can totally ruin our
21 property, not only farming, pasture, we're talking spring,
22 fall, summer pasture, haying, the cost of the amount of hay
23 that we're going to lose to feed our animals, the amount of
24 income that we're going to lose not being able to farm the
25 ground. And not to mention the value of our property going

PM1-17

PM1-18

PM1 Continued, page 31 of 51

PM1-17 Comment noted.

PM1-18 Section 2.4.2.1 of the DEIS discussed how the right-of-way would be reclaimed after pipeline installation, including special measures to be used in agricultural lands. Pacific Connector would compensate farm land owners for loss of crops or hay during the construction and restoration periods. After restoration, crops or hay could still be planted and harvested over the pipeline right-of-way. Property values are discussed in section 4.9.2.3 of the DEIS.

1 to kaput. I mean, what if somebody wants to eventually sell
2 their place and nobody wants to buy it because they've got
3 a pipeline in their ground.

4 And whether or not it's safe or not, it doesn't
5 matter. There's always a chance for something to happen.
6 We've already seen that happen previously.

7 Not to mention the fencing that will be damaged.
8 This project will totally affect our place 100 percent.
9 It's going to go through kitty corner through our whole
10 place. We're talking about ripping down every fence line
11 we've put into that place. Our pipe fence arena. We have
12 cattle, we have horses, we raise hay, and this pipeline will
13 affect every aspect of my life.

14 Again, you talk about, you know, the people being
15 able to have jobs and make money, what about our way of
16 living? How is that going to affect us? The company -- do
17 you think that they're going to tear down malls and shopping
18 centers? No, they would go around them. But, it's okay to
19 go through our land because it's perfect sand. So it's easy
20 digging.

21 My neighbor has already proposed -- he's got a
22 lot of BLM property that runs along the BLM and he said I
23 will let you have it for free if you run along the edge of
24 the mountain. But, no, we're going to destroy five, six
25 farms going through here instead of going around this

PM1-18
Cont'd

PM1-19

PM1-20

PM1 Continued, page 32 of 51

PM1-19 The safe operation of the project is addressed in section 4.13 of the DEIS.

PM1-20 If you know of an alternative route that could have avoided multiple farms, and moved the location of the pipeline for a short distance on to BLM land, where it may have lesser environmental impacts, you should have proposed that alternative route to the FERC staff during scoping, so we could have studied it in the DEIS.

1 mountain because it might be a little bit harder to dig.
2 But the guys -- the people that are doing it, they're going
3 to be rich in the end, aren't they.

4 You know, not to mention the easements, the
5 ground, the -- when you talk about coming in and disturbing
6 our ground, Klamath County has got some of the best hay
7 production ground in Oregon, in northwest. I know some
8 people that have had this pipeline go through their ground
9 in California. And I was told that they weren't allowed to
10 irrigate, put up fences or anything within so many feet of
11 this pipeline for six months. How do you think that's going
12 to affect our way of living? This is our way of living and
13 making money.

14 Not to mention the value of our home. People
15 wanting to put kids through college, what if they had to
16 sell their place to come up with money? Do you think it's
17 going to be easy to sell your property whenever there's a
18 pipeline running through it? I don't think so.

19 I am 100 percent against this. I think that if
20 it was a way to do it without disturbing everybody's ground,
21 that would be one thing. But there's already been proof
22 that they can go different routes and not disrupt people's
23 lives and way of living, but they won't do it. Why?
24 Because it's a little bit harder work. But, you know,
25 we're the ones that are going to be affected in the end.

1 Thank you.
2 MR. FRIEDMAN: Thank you for your comments.
3 (Applause.)
4 MR. FRIEDMAN: Next is Lynn Scofield.
5 MS. SCOFIELD: Hi, my name is Lynn Scofield, 1868
6 Hoover Hill Road, Winston, Oregon. I am an affected
7 landowner. My belief is the American people should be
8 gainfully employed and the landowners should get to keep
9 their property, their land.
10 In this circumstance as an export line coming out
11 of Canada using the American people's land for the sole
12 financial gain is nothing more than the perfect face of
13 greed. How is it that they are even morally okay taking and
14 forever using other people's properties for free and tell us
15 what we can do or not do on land we and our families worked
16 for and own.
17 I don't know of any landowners or neighbors of
18 affected landowners I've personally had discussions with who
19 want this project due to safety hazards, explosions,
20 leakage, and water contamination.
21 Landowners are also fearful of springs and wells
22 used for their drinking will be depleted due to water's
23 nature of wanting to follow the path of least resistance,
24 the pipeline.
25 We also will be closed -- we will also be dosed

PM1-21

PM1-22

PM1 Continued, page 34 of 51

- PM1-21 Potential project-related impacts to surface and ground water, including wells and springs, are addressed in sections 4.4.1 and 4.4.2 of the DEIS.
- PM1-22 Restrictions and proper use of herbicide during the projects construction and operation, as well as its effects, are addressed in section 4.5 of the DEIS. No herbicides would be sprayed from the air over the pipeline route. In fact, as explained in section 4.5.1.2 of the DEIS, Pacific Connector, in general, would not use herbicides, except in special cases to control weeds at specific locations, with the herbicides applied by hand on-the-ground.

1 with an overspray of herbicide while the pipeline maintains
2 the swath scar on our land. This will drift and also dose
3 our neighbors as well.

PM1-22
Cont'd

4 I went and saw this swath scar of the Ruby
5 pipeline today. It's not noticeable on the flat lands, but
6 the big swath scar coming down the mountain is visually
7 devastating especially when you picture it cutting through
8 your own land. We have lots of timber on our hillside and
9 this is also where the pipeline is going on our land and so
10 we too will get the swath scar.

PM1-23

11 I've been at Coos Bay, Roseberg, Canyonville,
12 Klamath and now here tonight. From what I've heard and
13 conversations I've had with union workers, landowners, and
14 affected landowners, I feel the best solution here is to
15 reroute the pipeline so it is not going through private
16 properties. Then the workers get their work and the
17 landowners get to keep their land. This is tragic to people
18 like us who would drive home every day to see the swath
19 scars forever. Not only is it visually devastating, it is
20 also economically devastating in regards to what it would do
21 to an individual's personal property values.

PM1-24

22 Every landowner should have a choice. If they
23 want this particular pipeline on their land or not. In our
24 circumstance of how much is a swath scar worth, I don't
25 know, because the beauty of my dad's ranch that he gifted to

PM1-25

PM1 Continued, page 35 of 51

PM1-23 As explained in section 2.4.2.1 of the DEIS, trees over 15 feet high would only be permanently removed within a 30-foot-wide corridor centered on the pipeline. The rest of the construction right-of-way would be restored and revegetated, including the planting of new trees. There will be a visual scar on the landscape along the pipeline route for the short-term. However, over time, as the newly planted trees in the right-of-way, outside of the 30-foot-wide corridor centered on the pipeline, grow, visual impacts would be reduced. This is discussed in section 4.8.2 of the DEIS, including visual simulations of tree growth over time.

PM1-24 We examined the possibility of an alternative route on federal lands in section 3.4.1.3 of the DEIS.

PM1-25 Impacts on landowners whose property would be crossed by the pipeline route, including effects on property values, are discussed in section 4.9.2.3 of the DEIS.

1 us last year upon his passing does not have a price.
2 Okay. One more page. Deeming us less valuable
3 as a being because we are a small population or a lower
4 socioeconomic class I see Williams and how they are
5 conducting themselves to the landowner and to the people of
6 the land and the communities as nothing more than criminals.
7 (Applause.)
8 MR. FRIEDMAN: Thank you for your comments.
9 Gavin, and Gavin, please spell your last name?
10 MR. R-A-J-N-U-S: Yeah, you're not going to get
11 that name. That's Rajnus, Gavin Rajnus, R-a-j-n-u-s. I'm
12 an affected landowner. I'm not any rocket science. I'm
13 just a guy. I'm just a dirt farmer, I guess, but I've
14 learned through the years to kind of follow the money on
15 things if you want to find the truth on certain things. And
16 I got this wonderful packet from the outfit here. And I got
17 reading under the information section, an economic boost for
18 southwest Oregon. The proposed LNG terminal and Pacific
19 Connector projects will help reduce the U.S. dependence on
20 foreign oil.
21 (Laughter.)
22 MR. RAJNUS: And I know I'm -- I guess this isn't
23 a question and answer period, so I guess I can't ask you
24 guys any questions. But, I'm going to ask you this, how is
25 it that a country that can't approve the pipeline where they

PM1-26

PM1-27

PM1 Continued, page 36 of 51

- PM1-26 It is the Department of Energy, not the FERC, that regulates the U.S. Energy policy. See response to IND1-3.
- PM1-27 The FERC cannot speculate as to the motives of a foreign government and has no authority over foreign governments. FERC's role in this process is to evaluate the application submitted to the FERC by the project's proponent.

1 want to ship their oil so they come down through us, to ship
2 their oil through the United States and export it to another
3 country. Why can't they export their oil --

4 PARTICIPANT: Through their own land.

5 MR. RAJNUS: -- yeah, through their own land.

6 Thank you.

7 Oh, that's right, you're not supposed to answer.

8 That's my question. And I can tell you the
9 answer to that and I think you guys know the answer to that.

10 But I guess on a more personal level, after reading that I
11 realize that I didn't need to read much further until I got
12 to this offer section. So I went through that really quick.

13 And I had the same kind of offer as this other gentleman,
14 \$3,600 and my land was valued at some ridiculous price. And

15 I thought, you know, if I'm going to maybe put a home site
16 up there or live up there, no one is going to want to buy
17 it. They're going to go across some farmland and being in

18 the seed business as a farmer, you know, you got to keep our
19 ground clean, free of nematode and the like. And I just
20 don't know how, I guess, conscientious the guy on the cat or

21 whatever, wherever they're coming from, they have to clean
22 all that stuff up and there's just a bunch of concerns I
23 have.

24 I guess that's my comments. And I'm not -- I'm
25 not against jobs. I'm not against jobs. That's not what my

PM1-27
Cont'd

PM1-28

PM1-29

PM1 Continued, page 37 of 51

PM1-28 Impacts on landowners whose property would be crossed by the pipeline route, including effects on property values, are discussed in section 4.9.2.3 of the DEIS.

PM1-29 Measures taken to minimize the risk of invasive species are addressed in sections 4.5 and 4.6 of the DEIS.

1 comments were about. I'm all for jobs.

2 MR. FRIEDMAN: Thank you for your comment.

3 (Applause.)

4 MR. FRIEDMAN: The next speaker is Bill Gow.

5 Mr. GOW: My name is Bill Gow, B-i-l-l G-o-w.

6 I've sat through -- this is my fifth meeting this week,
7 listening to all this. And there's been some fine comments,
8 but there's so much misinformation out there. It's
9 unbelievable how many proponents have come up with numbers
10 all over the board. It's just -- it just amazes me as I sat
11 and listened to all this stuff.

12 As I have talked to people I have found out that
13 most of them haven't even read the DEIS. You know, I've
14 really spent some time on this thing. I've spent a lot of
15 hours on this thing and it's a complicated son-of-a-gun. I
16 would like to see more time on it.

17 I would like him -- I don't oppose anybody
18 getting a job. But let's just look at this, what's really
19 went on. First of all, this is a transmission line, so
20 we've heard all this thing, they're going to run these
21 laterals. It's a transmission line. I don't think some of
22 these people understand that.

23 If this brought so much stuff to the economy,
24 just drive through Malin, Oregon right here and see boarded
25 up businesses. They have Ruby pipeline coming in right out

PM1-30

PM1 Continued, page 38 of 51

PM1-30

Section 4.9 includes estimates of employment and taxes that would result from the project. Most jobs would be associated with construction. Table 4.9.1.4-2 estimates 145 direct jobs and 445 indirect jobs associated with operation of the terminal in Coos County. The pipeline is estimated to create about 9 permanent jobs (page 4-816). Tables in section 4.9 also disclose the number of construction jobs, which are considerably higher. As for the comparison with Malin, we are not aware of an LNG terminal having been built in Malin.

1 of town. So if this was such a boom as I've heard all week,
2 I was looking for, you know, tower cranes all over
3 buildings, and you know, factories being built because this
4 is just like an economic boom, you know. And I mean, this
5 place is dying on the vine.

PM1-30
Cont'd

6 If Lake View, Oregon just has a 32-inch line go
7 through there, and I know a lot of people, I've been to Lake
8 View, I hauled hay there in the summer time. That poor
9 place has not gained nothing from the 42-inch pipeline that
10 just went south of town over there.

11 The temporary jobs are gone. You know, I mean,
12 there's no change. So if this is the silver bullet that
13 I've heard about all week that's going to run up there,
14 where is it? Where is the silver bullet for Ruby? Where is
15 the silver bullet in Malin? And, you know, if this gas is
16 so abundant right here, they don't need a transmission line
17 going to Asia to put this thing here. They can run a line
18 right from here up to Clarin Falls and build all these
19 businesses I've been hearing about and all this economic
20 boom. The gas is here. Okay.

PM1-31

21 You know, this whole thing has go so much
22 information on it and it starts out with, for most of you
23 people probably haven't heard of the econorthwest. I just
24 say the con job because the first three letters are con. It
25 was put out by Jordon Cove to talk about the economic

PM1-31

The natural gas supplied to the Pacific Connector pipeline would come from the Rocky Mountains or western Canada. It is not produced locally in southeast Oregon. See responses to PM1-32 and PM1-17. Landowners would be compensated for the right-of-way easement.

1 impacts of this pipeline. It's full of B.S. It's full of
2 crap.

3 They have worked on and got all kinds of bogus
4 figures. Well, you know, they did a study back in Hoe Bay
5 -- Hoe Bay back from the east coast and they tried to look
6 at both sides of this. They tried to look at both sides of
7 the issues here. And they found that there was really no
8 net gain jobs when they looked at everything.

9 The people really who are affected on this thing,
10 are the landowners. That's who is taking the brunt of this
11 thing. Us landowners are getting ripped off by this for
12 something that we're going to live with forever and these
13 other people are going to have a few temporary jobs here. I
14 know a couple, three years, I used to be an ironworker, I
15 know all about it. I'm a retired ironworker, I know how it
16 is.

17 But this is something I want to leave you guys
18 with. Justice will not be served until unaffected people
19 become as outraged as affected people. And the affected
20 people are the landowners. And that was from Benjamin
21 Franklin. And he saw it a long time ago.

22 Thank you.

23 MR. FRIEDMAN: Thank you.

24 (Applause.)

25 MR. FRIEDMAN: The next speaker is John Scofield.

1 MR. SCOFIELD: Hi, my name is Jon Scofield,
2 affected landowner out of Winston. It's been a long week.
3 Been to most of the meetings, all but one of them, I
4 believe. I've learned a lot this week, so I've got a lot of
5 concerns. I'm going to run through them real fast.

6 So, first of all, in Coos Bay, I heard about the
7 tsunami and this emergency response plan that's down there
8 that the Coast Guard, I believe, is buying into, that the
9 LNG ship, in the event of a tidal wave coming in from a
10 tsunami can disconnect the tug or disconnect the ship from
11 the shore, from the fuel lines, they'd fire up the tugs and
12 put them in position, get the ship out of the dock, and out
13 of the harbor to put its nose into the wave. This is simply
14 impossible to do in 20 minutes. I've seen these big ships
15 roll and they're slow.

16 Number two, we weren't told why the other
17 alternatives in the DEIS were not considered accurate, just
18 that they're not being considered.

19 No one else was given, which indicates to me and
20 others that the analysis probably wasn't completed. No
21 reasons were given as to why this project is at this point
22 being deemed consistent to the public interest. This is the
23 main purpose of the FERC analysis and it's not in the
24 report. I'd like to see that this next go round.

25 FERC wants Williams to negotiate fairly with the

PM1-32

PM1-33

PM1-34

PM1 Continued, page 41 of 51

PM1-32 The response to a tsunami at the Jordan Cove terminal was discussed in section 4.2.1.3 of the DEIS.

PM1-33 An assessment of other reasonable alternatives is presented in chapter 3 of the DEIS.

PM1-34 Nowhere in the DEIS is there a statement that the Project would be in the "public interest." In fact, the Commission would make its finding of public benefit in its decision-document Project Order. The EIS is not a decision document. The Commission would issue its Order after we have produced an FEIS.

1 landowners, however I have not heard one testimony of that
2 occurring. In fact, every story I've heard is then giving
3 no offers or extremely low ones and then telling people
4 things that are not true to get maybe some option paperwork
5 signed.

6 The question is, think about it, who enforces
7 this want of FERC for fair negotiations? Is there any
8 penalties if they do not negotiate in good faith?

9 All the testimonies from the union workers about
10 declaring this thing safe, and I am pro jobs, and getting
11 people to work, but in a quick review of notable pipeline
12 accidents since the year 2000, there's been 330 leaks in the
13 U.S., 139 explosions, 537 injuries, 80 deaths, 20 million
14 gallons leaked, \$700 million in cleanup fees and property
15 damage. That's an average of 35 injuries a year, five
16 deaths a year, 22 leaks a year, nine explosions a year. We
17 just had two more here recently in Washington by the
18 Williams Company. Again, I already commented on the
19 Williams safety record.

20 You have to figure out whether or not this
21 project is in the public interest. To me, whenever I have
22 to come up with any sort of business decision it's pros and
23 cons, and you weigh the out.

24 Here's the permanent effects of this project,
25 140-ish permanent jobs; right? Some tax revenue to the

PM1-35

PM1-35

We expect Pacific Connector to negotiate in good faith with landowners to acquire right-of-way easements. While there are no regulations on this subject, and the FERC does not monitor negotiations between landowners and companies, if a landowner feels they are not be treated fairly they can contact the FERC hotline. As stated in section 4.9, if the parties cannot agree, the matter would be up to the court to decide.

1 county governments might be there. I don't know in what
2 form. And we know that there's a ton of profit to foreign
3 corporations. There's \$33 million per shipload based on
4 current price differentials between here and China roughly.
5 On 80 ships, I think I read, a year going out, that's quite
6 a bit of money for the company. That's a lot of pros to
7 that Canadian company.

8 Here's the cons that we've seen this week. Land
9 is taken from 300 plus landowners by eminent domain if this
10 project is approved. Versus 140 permanent jobs, 300 plus
11 affected landowners, 140 jobs. No gas is really for public
12 use. The mountains of Oregon are permanently affected.
13 Endangered species become more endangered. Coos Bay will
14 have one of the largest emitters of pollution in the state.
15 An airport is aimed right at the proposed facility in Coos
16 Bay. It doesn't sound safe to me.

17 In conclusion, it is absolutely absurd to think
18 that the pros of this project outweigh the cons. Therefore,
19 FERC has no alternative but to deny this certificate.

20 And I also want to request additional time to
21 review this DEIS. I think reading 55 pages of this and the
22 way to digest a day, including all holidays and weekends as
23 Bill Gow originally stated earlier yesterday, it's absurd.
24 We need more time.

25 MR. FRIEDMAN: Thank you for your comment.

PM1 Continued, page 43 of 51

PM1-36 Comment noted.

PM1-37 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

PM1-36

PM1-37

1 (Applause.)
2 MR. FRIEDMAN: The next speaker is Tony Pate.
3 MR. PATE: My name is Tony Pate, T-o-n-y P-a-t-e.
4 And I represent union labor carpenters' side, Local 271 out
5 of Eugene, Oregon, United Brotherhood of Carpenters.
6 And I hear all this stuff and I empathize with
7 the landowners. I have been in an eminent domain experience
8 with the state of Oregon, ODOT. It was a highway
9 right-of-way. And I was treated very fairly. It didn't
10 start out that way. I was offered \$3,500, I think. You
11 know, and I had to kind of get my dander up and they came
12 around and, you know, they weighed all the things like you
13 guys are doing right now with DEIS. So, I don't -- you
14 know, don't let that scare you off. They haven't even begun
15 to negotiate with you guys, the way I understand it. If
16 this isn't even approved yet, they're just kind of testing
17 the waters. Of course, they're going to low ball.
18 I want to emphasize our counties. There's four
19 counties that could really use a tax boost. Okay. You say
20 this is all coming from Canada for free. Well, it's not for
21 free. They're going to pay tax money for every mile of
22 pipeline that's put in to the counties where it's located.
23 So that's very important to me in a county that's about
24 ready to lose its sheriff or, you know, all of its law
25 enforcement and the schools are pretty well, you know, low

PM1-38 The impact that the project could have to the tax base and economy
of affected counties is addressed in section 4.9 of the DEIS.

PM1-38

1 budget.

2 On the other side of that, we're talking about
3 natural gas versus coal which is cleaner. We've already
4 found out that both greenhouse gases, but you get a lot
5 cleaner energy out of natural gas. Until we can figure out
6 the golden goose and get power because everybody here has a
7 light switch, has hot water heaters, has cell phones, has
8 power usage, you guys that are being affected by the
9 property, you're the same way. Unless you're off the grid
10 somewhere getting solar, maybe you got a water ram or
11 something, that's all well and good. But we need energy, we
12 need the jobs, we need the DEIS, you guys doing your job,
13 you know.

14 I have faith. I've seen it happen before. I
15 have faith that, you know, it's not just going to be a crock
16 of crap. It's going to come out, there's going to be
17 oversight. I've been involved with some of these programs
18 before. And, yeah, they have -- this guy stated a lot of
19 statistics. You know, things happen, but, you know, I drive
20 a car every day. And I lived through it today, you know.

21 Anyway, I thank you for your time, probably
22 boring you, but like I say, the eminent domain thing, it
23 doesn't have to go that far. You know, a lot of times
24 they'll negotiate. And I call it good faith. You guys
25 might have a different bias on it. You know, I did when I

1 first started into it. So, thank you for your time.

2 MR. FRIEDMAN: Thank you for your comment.

3 (Applause.)

4 MR. FRIEDMAN: The next and last speaker is Ten
5 Gleichman.

6 MR. GLEICHMAN: Good evening. You know, we've
7 got to stop meeting like this. I think we will after the
8 Medford session and perhaps others at the Medford session
9 that's projected to occur as a secondary follow up to that
10 one.

11 I have a couple of technical questions. And so,
12 could you tell me, please, Mr. Friedman, if they fall into
13 my time, or if they would be excluded on that basis?

14 MR. FRIEDMAN: No. I know the answer.

15 MR. GLEICHMAN: So first, and Bob Barker asked me
16 to pass these on, landowner at the Rogue River Crossing.

17 MR. FRIEDMAN: I know Bob.

18 MR. GLEICHMAN: You know Bob. So there are
19 several footnotes on page 4-387 of the DEIS that list
20 several appendices 2H, 2E, and 2G, to resource report number
21 two. These documents are not included in the DEIS.

22 MR. FRIEDMAN: Stop right there. I'll tell you
23 where they are. They're on e-library under the applica --
24 that's a citation to the application and the resource
25 reports are found in the application. Anyone can look them

1 up on line through e-library and I explained earlier how to
2 do e-library.

3 MR. GLEICHMAN: Are they technically considered
4 part of the DEIS?

5 MR. FRIEDMAN: They are part of the application.
6 The application is part of the consolidated record.

7 MR. GLEICHMAN: And is the consolidated record --
8 how does that work in relationship to the DEIS?

9 MR. FRIEDMAN: The DEIS is a summary of data, all
10 right. The application is the consolidated record. The
11 Commissioners make their decision on the consolidated
12 record.

13 MR. GLEICHMAN: On the consolidated record.
14 Okay.

15 So, concerns about elements within those items
16 found through e-library on the FERC website could be
17 properly incorporated into comments on the DEIS; is that
18 correct?

19 MR. FRIEDMAN: Yes, that is correct.

20 MR. GLEICHMAN: Okay. Thank you. The second
21 question is, the geoengineers' report included in Appendix
22 2H attached to resource report number two, the Rogue River
23 horizontal and directional drilling preliminary feasibility
24 analysis, file 8169-021-00 Task 1200, it's not that this is
25 complicated, states "the HGD entry work space may be

1 accessed via private drive off of Old Ferry Road, and will
2 likely require clearing and extensive grading improvements
3 prior to construction." These extensive grading
4 improvements which may have environmental consequences, it's
5 a very small road, should be detailed now rather than
6 waiting until construction begins so they may be addressed
7 --

8 MR. FRIEDMAN: Ted, I'll stop you right there.
9 There is a discussion of all the improvements on Old Ferry
10 Road in the DEIS.

11 MR. GLEICHMAN: Okay. So I don't know why Bob
12 didn't catch that adequately --

13 MR. FRIEDMAN: Because it's a really big
14 document.

15 MR. GLEICHMAN: Well, and that's an interesting
16 point. My colleagues, I think, were way too conservative
17 and polite on this issue of more time. I think we should
18 have asked to double it, to go from 90 days to 180 and then
19 maybe hope that somebody would graciously grant us an extra
20 30. But the way that things often get compromised. But let
21 me get in trouble with my Sierra Club lawyer.

22 I didn't even do my name and spelling yet. I'm so
23 bored with spelling my name, I'm going to change -- no, so
24 I'm Ted Gleichman, G-l-e-i-c-h-m-a-n. I represent Sierra
25 Club. Had the privilege of being with you from Coos Bay to

PM1-39

PM1-39 The FERC decided not to extend the 90-day period for comments
on the DEIS past February 13, 2015.

1 Roseberg, Canyonville, Medford, Klamath Falls and now here
2 in Malin. So it's been a privilege for me coming from
3 Portland to have this experience.

4 How much time do I have now?

5 MR. FRIEDMAN: About a minute.

6 MR. GLEICHMAN: About a minute. I've used two
7 already? Those didn't count as questions?

8 Okay. We see four major areas of concern in the
9 whole broad picture of this extremely complex project.

10 First, there's a whole series of environmental,
11 economic, and personal damages like landowner damages that
12 are reflective by some aspect of the project, in many cases,
13 by many aspects and it is apparent to us and we've received
14 a great deal of testimony on this, this week, that much of
15 that cannot be truly mitigated.

16 Second, the earthquake and the tsunami, I want to
17 recommend to you all -- maybe we should submit it for the
18 file, a book called Full Rip 9.0 by Sandi Doughton,
19 S-a-n-d-i D-o-u-g-h-t-o-n, she's a science writer for the
20 Seattle Times. It's one of the best things that's been done
21 on describing exactly how this came down. And many of the
22 Oregon State University professors and other locals have
23 been participating, were interviewed and part of what --
24 this is new information over the last 30 years.

25 It's not the welding of the pipeline when it goes

PM1-40

PM1 Continued, page 49 of 51

PM1-40

Seismic hazards are address in section 4.2.1.3. Site-specific geotechnical investigations and seismic hazard analysis are presented in section 4.2.1.4. The measures to mitigate for a possible future earthquake and ground shaking were reviewed by a consultant from California who is an expert in seismic design. While there have been many strong earthquakes in California, we are unaware of any significant damage those earthquakes caused to FERC jurisdictional natural gas facilities in that state.

1 in the ground, it's having a magnitude nine or magnitude
2 quake hit it on every section all along the route.
3 Third, climate solutions. It is clear from the
4 latest science, and I submitted data to you that this is not
5 a climate solution, it will not displace coal in China, and
6 gas is a problem because of chronic methane leakage. And
7 finally, the good jobs fallacy around fossil fuels -- I use
8 fossil fuels every day just like everybody else. But we
9 need to begin to make that transition and those clean jobs
10 with solar wind infrastructure create property tax, create
11 benefits, and the remediation on the earthquake and the
12 tsunami will also make a dramatic difference to the finances
13 of this area and we're going to continue working on that.
14 Thank you for your time.
15 MR. FRIEDMAN: Thank you for your comment.
16 (Applause.)
17 MR. FRIEDMAN: That is our last speaker tonight,
18 so that concludes this meeting.
19 On behalf of the FERC and our federal cooperating
20 agency partners, I would like to thank you all for coming
21 here tonight and providing us with your comments on the DEIS
22 for the Jordan Cove Pacific Connector project.
23 Let the record show that this meeting ended at
24 7:15 p.m. Thank you.
25 (Whereupon, at 7:15 p.m., the meeting was

PM1-40
Cont'd

PM1-41

PM1-41 It is the Department of Energy, not the FERC, that regulates the U.S. Energy policy. See response to IND1-3.

1 adjourned.)

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PM2 Public Meeting, Medford, OR, December 22, 2024

20150113-4006 FERC PDF (Unofficial) 01/13/2015

1

PM2

1 BEFORE THE
2 FEDERAL ENERGY REGULATORY COMMISSION
3 ----- x
4 IN THE MATTER OF: : Project No.
5 JORDAN COVE - PACIFIC CONNECTOR : CP13-483-000
6 PIPELINE PROJECT : CP13-492-000
7 ----- x
8
9 Old Medford High School
10 815 S. Oakdale Avenue
11 Medford, OR 97501
12
13 Thursday, December 11, 2014
14 The above-entitled matter came on for technical
15 conference, pursuant to notice, at 6:00 p.m., Paul Friedman,
16 the moderator.
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1 PROCEEDINGS

2 MR. FRIEDMAN: So, good evening ladies and
3 gentlemen. And I really have to thank you for being here
4 tonight. On behalf of the Federal Energy Regulatory
5 Commission -- we abbreviated that F-E-R-C -- or the
6 Commission, and our federal cooperating agency partners I
7 would like to welcome you to the public meeting to take
8 comments on the Draft Environmental Impact Statement or
9 DEIS, that the FERC issued on February 7, 2014 for the
10 Jordan Cove Local Fraction and Pacific Connector Pipeline
11 Projects, we abbreviate that as the project.

12 My name is Paul Friedman, and I'm the FERC
13 environmental project manager. With us here tonight also
14 from the FERC that's Steve Busch, that rather small person
15 there, and he's the assistant project manager. From the BLM
16 I have Miriam Liberatore and Mark Mackiewicz.

17 From the Forest Service we have Wes Yamamoto and
18 in the back, who you may have met when you signed up, I have
19 the two Johns, John Scott and John Crookston. They work for
20 a company called Tetra Tech, which is my third-party
21 contractor. They helped us produce the DEIS. The BLM and
22 Forest Service are also has a third party contractor. That
23 company is called North State Resources, and they're
24 representative tonight is Mike Huff and Paul Uncapher.

25 Let the record show that this meeting began at

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1 5:50 p.m. on Thursday, December 11, here at the Old Medford
2 High School in Medford, Oregon.

3 As you can see, this meeting is being recorded
4 and transcribed by a court reporter on behalf of the FERC so
5 there will be accurate notes on tonight's proceedings. The
6 court reporter is an employee of an independent company
7 called Ace Federal Reporters, Inc. and Ace is an independent
8 contractor.

9 Ace will sell copies of the transcript at various
10 sliding scale prices, beginning from same day to five
11 business days after the meeting. If you'd like a copy of
12 the transcript prior to its being posted on the FERC
13 website, you can make arrangements directly with Ace.

14 If you'd like to speak tonight, and by the way,
15 we are contracted until 11:00 p.m., so we are going to let
16 everyone speak for three minutes each, and we're going to go
17 all the way until 11:00 o'clock, if I need to, to get as
18 many people an opportunity as possible to say something
19 tonight.

20 Remember if something happened and you didn't get
21 called, you may put your comments in the record, and I'll
22 explain how to do that in a little bit.

23 If you want to speak tonight, there's a sign-up
24 list at the back with the Johns. The Johns are waving their
25 hands.

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1 The production of the DEIS was a collaborative
2 effort, involving a number of federal cooperating agencies,
3 including the BLM, Forest Service, Corps of Engineers,
4 Department of Energy, EPA, Department of Homeland Security
5 Coast Guard, Department of Interior, the Fish and Wildlife
6 Service, the Bureau of Reclamation, and the Department of
7 Transportation.

8 The cooperating agencies had an opportunity to
9 review an administrative draft and some agencies contributed
10 text to the DEIS. For example, the BLM and the Forest
11 Service and their third-party contractor wrote sections of
12 the DEIS related to their evaluation of proposed amendments
13 to an individual district and National Forest Land
14 Management plans to make provision for the pipeline.

15 In a few minutes, the BLM and Forest Service
16 representative will explain the actions of their agencies.
17 I would like to thank the federal cooperating agencies for
18 their participation in the environmental review process.

19 FERC is an independent Federal agency that
20 regulates, among other agencies, the interstate
21 transportation of natural gas. We were originally known as
22 the Federal Power Commission when we were created by
23 Congress in 1920. At the head of our agency are five
24 Commissioners appointed by the President of the United
25 States and confirmed by Congress.

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1 Steve and I were not selected by the President.
2 We are mere civil servants. We're called staff and staff
3 makes recommendations to the decision makers who are the
4 five commissioners. The Commissioners have not yet made a
5 decision about this project. However, you can read staff's
6 recommendations in Section 5.2 of the DEIS.

7 In accordance with Energy Policy Act of 2005 of
8 the Natural Gas Act, the FERC is the lead federal agency
9 responsible for authorizing onshore LNG or liquefied natural
10 gas terminals and interstate natural gas facilities. We are
11 also the lead agency for compliance with the National
12 Environmental Policy Act of 1969, which we call NEPA.

13 Our DEIS was prepared to satisfied the Council on
14 Environmental Quality's regulations for implementing the
15 NEPA. The federal cooperating agencies can adopt the EIS
16 for their regulatory needs and to comply with the NEPA;
17 however, each individual agency would make their own
18 conclusions in their respective records of decision.

19 The FERC's record of decision is called a
20 commission order. And like I said before, there is no
21 decision made by the FERC yet about this project. The
22 Commissioners will make their decision after we produce a
23 final environmental impact statement.

24 In May 21, 2013, Jordan Cove Energy Project, LLC,
25 which we call Jordan Cove for short, filed an application

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1 with the FERC under Section 3 of the MGA, Docket No.
2 CP13-403-000, seeking authority to construct and operate an
3 LNG export terminal at Coos Bay in Coos County, Oregon.

4 Jordan Cove intends to produce about 6 million
5 metric tons per year of LNG from a supply of about 1 billion
6 cubic feet of natural gas for shipment by third-party
7 vessels to customers around the Pacific ream. Jordan Cove
8 already has permission from the Department of Energy to
9 export to both free trade agreement and non-free trade
10 agreements nations.

11 The main facilities at the terminal would be a
12 420-megawatt power plant, a natural gas processing plant,
13 four liquefaction trains, two LNG storage tanks, a transfer
14 pipeline and loading platform, a marine slip with docks for
15 LNG vessels and tugboats, and access channel connecting the
16 existing Coos Bay navigation channel.

17 Pacific Connector Gas Pipeline, LLP, or Pacific
18 Connector, filed its application with the FERC in Docket
19 Number CP13-492-000, under Section 7 of the MGA on June 5,
20 2013. Pacific Connector seeks authority to construct and
21 operate a 282-mile long, 36-inch diameter underground welded
22 steel transmission pipeline between the mainland hub and the
23 Jordan Cove terminal.

24 The pipeline route would request portions of
25 Klamath, Jackson, Douglas, and Coos Counties. Near Malin,

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1 Pacific Connector would connect with existing pipeline
2 systems of Gas Transmission Northwest or GTN, and Ruby
3 Pipeline or Ruby, to obtain natural gas produced in western
4 Canada and the Rockies Mountains.

5 For full disclosure, Ruby is partly owned by one
6 of the partners of both Pacific Connector and Jordan Cove.
7 GTN is owned by a company called TransCanada.

8 The Pacific Connector Pipeline would have a
9 designed capacity of about 1.07 bcf a day with 0.04 bcf
10 dedicated to delivery at existing Northwest Pipeline Grants-
11 Pass Lateral to serve customers in Oregon. Again, for
12 clarification, Northwest is owned by one of the partners of
13 Pacific Connector.

14 Other the facilities associated with the Pacific
15 Connector Project included a 41,000 horsepower compressor
16 station near Malin, two meter stations for GTN and Ruby
17 within the compressor station track, the Clark's branch
18 delivering meter station for the interconnection with
19 Northwest, a delivery meter station at Jordan Cove, five pig-
20 launchers and receivers, 17 mainline valves and 11
21 communication towers.

22 Jordan Cove would receive its natural gas
23 supplies from the Pacific Connector Pipeline; therefore,
24 although those are two separate applications before the FERC
25 by two separate companies, we are considering them connected

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8

1 actions and we are evaluating the environmental impacts of
2 both the LNG terminal and the pipeline together in one
3 comprehensive DEIS.

4 The two companies also share some ownership
5 overlap. I want to make it clear that the project is being
6 proposed by two private companies.

7 The FERC is not a proponent of this project. The
8 companies came up with the design for their locations of
9 their facilities and the FERC will analyze the environmental
10 impacts associated with the construction and operation of
11 those facilities.

12 We are advocate for the environmental review
13 process. We are not advocates for the project itself. The
14 Commissioners will make their own independent decision about
15 whether or not this project has benefits that would be in
16 the public interest and that decision will be made in the
17 future. The EIS is not a decision document.

18 During our review of the project, we assemble
19 information from a variety of sources, including the
20 applications and data responses by the companies, public
21 input, information that came from other federal, state, and
22 local resource agencies, and our own research. Our analysis
23 can be found in the DEIS.

24 We sent copies of the DEIS out to our
25 environmental mailing list, which includes elected

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1 officials, federal, state, and local agencies, regional
2 environmental groups, and non-governmental organizations,
3 affected landowners, Indian Tribes, commenters, other
4 interested parties, local newspapers and libraries, and
5 parties to the proceeding.

6 Paper copies were only sent to those who
7 requested in response to our Notice of Intent. We no longer
8 have any paper copies available. All others received a
9 compact disk or CD version.

10 Anyone who received a copy of the DEIS will also
11 be sent a copy of the FEIS. You do not have to sign up
12 again. However, if you did not receive a copy of the DEIS
13 and you want a copy of the FEIS, please go to the back of
14 the room, see the Johns, and sign up at their table on our
15 environmental mailing list. At that time, you can request a
16 hard copy, if you want one.

17 About 72 miles of the pipeline is on federal
18 land, including 40 miles of BLM land and 31 miles of Forest
19 Service land, and less than a mile of Reclamation land. At
20 this point, I'd like to introduce Miriam Liberatore,
21 representing the BLM and the Forest Service, and she will
22 explain those agencies do with regard to this project.

23 MS. LIBERATORE: Thank you, Paul. I'm Miriam
24 Liberatore. I work for the BLM here at the Medford
25 District, and I'm the BLM's project manager for the Pacific

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PM2 Continued, page 10 of 152

1 Connector Pipeline Project.

2 The BLM and the Forest Service have a role on
3 this project because of the project crossing over federal
4 lands. And just for clarification, we are not involved in
5 the liquefaction plant at Coos Bay and we're not involved in
6 where the pipeline crosses over private land, but we are
7 involved in where the pipeline crosses over federal land,
8 and that would be lands managed by the BLM, the Forest
9 Service and the Bureau of Reclamation.

10 As is proposed in the DEIS, the project would
11 cross, as Paul said, about 70, 71 miles of federal land, 40
12 for the BLM, 30 for the Forest Service and less than one for
13 facilities managed by Reclamation.

14 In order to cross those lands, Pacific Connector
15 needs a right-of-way grant to cross over federal lands, and
16 that's the same as anybody else that wants to cross federal
17 lands for any reason, including many of you probably have a
18 driveway over BLM. And so, they have applied for a
19 right-of-way grant at this time.

20 BLM is the agency that will make a decision to
21 either deny or issue the grant, and we get that authority
22 from the Mineral Leasing Act of 1920. So BLM will make the
23 decision and Forest Service and Reclamation will concur with
24 our decision either to grant or deny.

25 At this point, no decision has been made by any

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1 of the agencies about the right-of-way grant and that
2 decision won't be made until after the FEIS has been
3 published and after other conditions that we need to make
4 the decisions have been met. So, there's been no decision
5 made at this time.

6 The pipeline, if constructed, would not conform
7 to the current land management plans that BLM and Forest
8 Services use to administer our grants. And in order to be
9 considered for a right-of-way grant it has to conform. So,
10 before we can even consider a grant, our land management
11 plans would need to be amended so that the project can
12 conform, and then this project in the DEIS there's a
13 description of proposed land management plan amendments that
14 would allow that to happen.

15 The amendments we would consider are detailed in
16 the Draft EIS. For the BLM, it's affect Coos Bay District,
17 Roseburg District, and Medford District and the Klamath
18 Falls resource area of the Lakeview District. And for the
19 Forest these are on the Umpqua National Forest, the Rogue
20 River National Forest, and the Winema National Forest.

21 There are 20 amendments proposed in the DEIS.
22 Four of them are for BLM land management plans, fifteen of
23 them are for the Forest Services' plans, and then one is a
24 joint amendment for both agencies. These address issues
25 that have to do with our survey and manage guidelines, and

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1 for habitat retention for northern spotted owl and the
2 marbled murrelet and for the other environmental conditions
3 having to do with soils, visual quality objectives, riparian
4 areas, and also a proposal to convert some of our metrics
5 lands, which is where we have our timber bases and other
6 uses to lake successional
7 reserves and that's to make up for the direct loss of lake
8 successional reserves acreage that would be in the pipeline
9 full time.

10 The decisions that the BLM and Forest Service
11 need to make require us to follow the NEPA process. And so,
12 as cooperating agencies, we will accept FERC's Final EIS to
13 do that. So, our proposed activities are being disclosed
14 under FERC's EIS.

15 If you want to comment on that, you comment
16 tonight. I'm sure that's why some of you are here. And if
17 you prefer to you can comment in writing, but Paul will tell
18 you the process for doing so. This is not BLM's or Forest
19 Service's EIS and so comments would not come to us, so pay
20 attention to the process. And we're really looking forward
21 to hearing from you. We're glad you're all here tonight.
22 This is process. We are in a process and we want to hear
23 what you have to say. Thank you.

24 Thank you very much.

25 MR. FRIEDMAN: Thank you, Miriam.

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13

PM2 Continued, page 13 of 152

1 We are beginning a 90-day period for taking
2 comments on the DEIS. Comments can be filed with the
3 Commission up until February 13, 2015. The FERC keeps the
4 consolidate record for these proceedings, so please do not
5 send your comments to the BLM and the Forest Service.

6 Also, do not send me emails. Apparently, there's
7 an organization out there telling the public false
8 information and as a result, many people are sending me
9 emails. None of those will be considered by the FERC. Only
10 comments filed in the record are considered by the FERC.
11 I'm going to now tell you how to do that. First, you can go
12 to our website at www.FERC.gov and use what we call the
13 E-comment feature on the FERC webpage. Second, you can use
14 the E-filing feature on the FERC webpage. Third, you can
15 write a letter to the Secretary of the Commission at 888
16 First Street, N.E., Washington, D.C. 20426. Remember to
17 always mark your comments with the docket number
18 CP13-483-000 for Jordan Cove and CP13-492-000 for Pacific
19 Connector.

20 UNIDENTIFIED FEMALE AUDIENCE MEMBER: Everybody
21 got that?

22 MR. FRIEDMAN: Wait a second. I'm going to tell
23 you tell you right now how you can find all of this
24 information on the Internet. You can go to www.FERC.gov in
25 documents and filings. Go to the E-Library link and look up

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1 our Notice of Availability, which was issued on November 7,
2 2014, and everything I just said is on that NOA or Notice of
3 Availability.

4 The FERC's address is 888 First Street, N.E.,
5 Washington, D.C. 20426. So, not only am I saying it now,
6 you can look it up on the Internet, just click on Notice of
7 Availability. Many of you were probably sent that or saw it
8 when we issued it.

9 All comments received, whether written or oral
10 will be given equal weight by the FERC staff and will be
11 addressed in our Final EIS. It does not matter if your
12 comments were transmitted on the first day that the DEIS on
13 oral will be given equal treatment by the FERC staff and
14 will be addressed in our Final EIS. It does not matter
15 whether your comments were submitted the first day the
16 issued on November 7 or on the last day we take comments on
17 February 13, 2015.

18 While the purpose of tonight's meeting is to take
19 verbal comments on the DEIS, given the limited time each
20 presenter will have at this forum, I urge you to send more
21 detailed comments to the FERC, either electronically or in
22 writing. The more specific your comments, the better we can
23 address your concerns.

24 Comments such as I am in favor of the project, or
25 I'm against the project are not particularly helpful. This

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1 is not an election, and it's not a popularity contest. It's
2 an environmental review. We want to know the environmental
3 issues that are important to you so that we can address them
4 better in the FEIS.

5 After the comment period ends on February 13,
6 2015, the FERC staff and our third-party contractor,
7 together with the federal cooperating agencies will review
8 all the comments and address them in the FEIS. The FERC
9 will issue a revised notice of schedule in the near future
10 that will present a new date for the issuance of the FEIS
11 and the 90-day period for the other cooperating agencies.

12 No decision about approving or not approving the
13 project has been made at this time. The EIS is not a
14 decision document. Only after taking into consideration the
15 findings in the FEIS, will the Commission make their
16 decision, looking at both environmental and
17 non-environmental factors, such as markets and rates and
18 tariffs.

19 If the Commission authorizes the project in an
20 order, only the parties to the proceeding, known as
21 interveners, may legally question that decision. The FERC's
22 requirement for filing a motion to intervene can be found
23 under Title XVIII, Code of Federal Regulations, Part
24 385.124.

25 While the period for filing a motion to intervene

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1 has passed, the Commission will consider requests for late
2 intervention with cause. Typically, affected landowners and
3 those with legitimate environmental concerns who could not
4 be represented by another are considered to have good cause
5 for late intervention. However, simply filing comments will
6 not give you intervener status, but you do not need to be an
7 intervener to have your environmental comments considered.
8 An intervener may seek a rehearing on the Commission order.

9 If the Commission decides to authorize this
10 project, construction may not begin until Jordan Cove and
11 Pacific Connector obtain all other necessary federal permits
12 and approvals.

13 At a minimum, this includes Biological opinions
14 from the Fish and Wildlife Service and National Marine
15 Fisheries Service under the Endangered Species Act; a
16 right-of-way grant for the pipeline issued by the BLM, under
17 the Mineral Leasing Act with concurrence from the Forest
18 Service and Reclamation; permits under Section 10 of the
19 Rivers and Harbors Act; water quality certification under
20 Section 404 of the Clean Water Act issued by the Oregon
21 Department of Environmental Quality; permits under the Clean
22 Air Act also issued by the Oregon Department of
23 Environmental Quality, and a determination by the Oregon
24 Department of Land Conservation and Development that the
25 project would be consistent with the Coastal Zone Management

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1 Act.

2 In addition, the Energy and Facilities Siting
3 Council of the Oregon Department of Energy must approve the
4 South Bend Power Plant, which is associated with Jordan
5 Cove's terminal.

6 Jordan Cove and Pacific Connector must document
7 that all pre-construction conditions in the FERC's order
8 have been met before we would allow construction to begin.
9 All construction activities would be monitored by the FERC
10 staff and the federal land managing agencies.

11 Now is the best part of the meeting when you, the
12 public, get an opportunity to speak. I'll remind you that
13 the purpose of this meeting is to hear public comments about
14 DEIS.

15 In general, I will not be responding to your
16 comments tonight, unless you ask an administrative question
17 that I happen to know the answer to; otherwise, I will just
18 be listening. We will address your comments in the FEIS
19 after we do the appropriate research.

20 AUDIENCE MEMBER: Is there room up front for
21 people?

22 MR. FRIEDMAN: There actually is a little bit
23 more room up front. Yes.

24 AUDIENCE MEMBER: Especially, if you can sit on
25 the floor, if there's not chairs.

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1 MR. FRIEDMAN: Yes. If you come up front, you
2 have to sit on the floor.

3 AUDIENCE MEMBER: Is this just a mistake that you
4 chose a small room.

5 MR. FRIEDMAN: I didn't choose this room. I had
6 a contract for the auditorium.

7 AUDIENCE MEMBER: If this represents how we get the
8 voice, that doesn't look good.

9 MR. FRIEDMAN: It is what it is.

10 AUDIENCE MEMBER: They're outside. They cannot
11 come here. We have no room.

12 MR. FRIEDMAN: Right. I understand that. So,
13 what we've asked is that after people speak to please leave
14 the room and allow people who are outside to come in. We
15 contracted for a larger room.

16 AUDIENCE MEMBER: Let the record show that.

17 MR. FRIEDMAN: Let the record show that.

18 AUDIENCE MEMBER: Will the record show that all
19 were not allowed inside.

20 MR. FRIEDMAN: If people, after they speak, leave
21 then there'll be some more room for people who are outside
22 to come in.

23 AUDIENCE MEMBER: (Comment off mic.)

24 MR. FRIEDMAN: I agree with that, but there's
25 nothing I can do about it.

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1 AUDIENCE MEMBER: This might be symbolic. MR. FRIEDMAN: I
2 will consider another meeting back here maybe. Okay.
3 AUDIENCE MEMBER: Will we be granted another
4 meeting?
5 MR. FRIEDMAN: I will consider that.
6 AUDIENCE MEMBER: We'd really appreciate it.
7 AUDIENCE MEMBER: And deadline extension.
8 MR. FRIEDMAN: That's a separate issue, but I
9 will consider having another meeting in Medford.
10 AUDIENCE MEMBER: Thank you.
11 MR. FRIEDMAN: You're welcome.
12 So, here are some ground rules for tonight's
13 meeting. After I call your name, please come up to the
14 podium and speak into the microphone, identify yourself, and
15 spell your name for the court reporter.
16 If you represent an organization, state the name
17 of that organization. If you are a landowner along the
18 pipeline route, provide us with the approximate milepost of
19 your property or an address or cross streets. If you have a
20 written summary of your comments, please give that to the
21 Tetratech team and the back of the room, and we'll make
22 certain it gets into the public record.
23 My number one rule, and this is very important,
24 please show respect for all speakers, whether you agree with
25 them or not. I urge you not to cheer, and of course, do not

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1 boo please.

2 Lastly, because of the large number of speakers
3 that are here tonight, we're limiting each individual three
4 minutes. At two and a half, you'll see a yellow card and
5 then at three minutes there's a red card. At that point I'm
6 going to ask you to stop talking so that someone else can
7 have an opportunity to speak.

8 At this time, I'm going to start calling names.

9 AUDIENCE MEMBER: Call several so we don't have
10 to wait.

11 MR. FRIEDMAN: That's exactly what I'll do.
12 That's a great idea. So, I'm going to call several and come
13 up to the front of the room and be ready to speak, Gary
14 Woodring, Debra Herzog, Susan Dilles, Elizabeth Hallett, and
15 Louise Chawkat. And if I mispronounced your name, you are
16 to correct me.

17 AUDIENCE MEMBER: If I speak, and then I have
18 time, can I give it to somebody else?

19 MR. FRIEDMAN: The answer is no, because look at
20 how many people want to speak tonight.

21 AUDIENCE MEMBER: But we should all be given
22 three minutes.

23 MR. FRIEDMAN: Yes, you will all be guaranteed
24 three minutes.

25 MR. WOODRING: My name is Gary Woodring. Is the

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PM2 **Continued, page 21 of 152**

1 mike on?

2 MR. FRIEDMAN: Yes, I think you need to get
3 closer.

4 MR. WOODRING: My name is Gary Woodring, G-a-r-y,
5 W-o-o-d-r-i-n-g. I'm a citizen of Jackson County. I'm not
6 a dollar bill.

7 Okay, this is a message for FERC. Who do you
8 represent? Could it be for the people and by the people?
9 I'm going to make a statement. The earth is not a
10 commodity. The earth is not a commodity. We all like
11 stories about this statement, then we continually discount
12 or deny our awareness, especially when we are on a powerful
13 commission like FERC.

14 If you look at the events of our current
15 political situation, division in our nation, you will find
16 that overt actions and their consequences are paramount.
17 There are countless examples of these. I won't give them,
18 but don't add this to that degradation by this project.

19 Eminent domain by private corporations to condemn
20 and acquire right-of-way for this project finds its essence
21 and genesis in public interest. This project, I submit, is
22 not in the public interest of Jackson County and its prize
23 river, the Rogue River. And I strongly see it in conflict
24 with the public interest of this county. Thank you.

PM2-1

25 MR. FRIEDMAN: Thank you for your comment. The

PM2-1

The U.S. Congress decided to convey the power of eminent domain to private companies that receive a Certificate from the FERC when it passed section 7(h) of the NGA in 1947. The Commission would make its finding of public interest in its decision-document Project Order.

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22

1 next speaker is Debra Herzog.

2 MS. HERZOG: Hi. My name is Debra Herzog,
3 D-e-b-r-a, H-e-r-z-o-g.

4 MR. FREEMAN: I want to make a great point here.
5 If she leans close to the microphone, look how clear her
6 voice comes out.

7 MS. HERZOG: Well, I'm also a teacher, but that
8 should not take off my minutes.

9 I have lived in the Shady Cove area for 41 years.
10 I have taught in the schools there for 34 years, and I think
11 I have some say into what goes on in our area, and this is
12 for the people and by the people. We need to make sure
13 we're standing up.

14 First of all, the impacts to the rivers and the
15 streams for this project are huge. And in our area, the
16 fisheries are a huge piece of the economy. The fishing on
17 the river brings in people -- tourists from all areas. It
18 brings money into our area. I know there's a lot of people
19 concerned about jobs, and that's why they're supporting this
20 project. Some of the people that are concerned about jobs
21 and they think they're going to have a bunch of jobs with
22 this, and that is not true.

23 As you well know, I can't say anything here that
24 you don't already know. I know you know there's not going
25 to be the kind of jobs that people are expecting and they're

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1 not going to be permanent, but the disasters will be
2 permanent. And after we've had Tsunamis that have caused
3 issues with nuclear plants, earthquakes that can also do the
4 same thing, and we always say, oh, but this one's going to
5 be safe. They always say that until the disaster happens,
6 and then you can't go back.

7 And there are so many important things in our
8 environment here that will be destroyed if there are
9 accidents. Going underneath rivers, first of all, that
10 presents a huge problem. Not only does it affect the
11 fisheries while that construction is taking place, but the
12 issue that there can be accidents and what would that do to
13 those rivers and the whole environment around that. Climate
14 change is what we need to be addressing here.

15 Also, a new power plant that's going to emit more
16 CO2 into our environment, no, that's not what we need in
17 Oregon or anywhere else in this world. I just hope that you
18 will consider very strongly what this is going to do to the
19 people that will be losing part of their land. And I agree
20 with the last gentleman that says that is absolutely not
21 okay for a private company that is not going to benefit very
22 many people when it's finished for them to be able to take
23 land with eminent domain. That is not okay.

24 So, I urge you, I urge you because this is an
25 emergency. This is not just people not wanting to have a

PM2-2

PM2-2 Impacts on rivers are addressed in section 4.4 of the EIS, fisheries in section 4.6. See response to IND1-1. The Commission would make its finding of public interest in its decision-document Project Order.

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1 pipeline. This is an emergency for our world, and we should
2 be looking at something else other than more fossil fuels
3 and then putting them into areas where we could have real,
4 real disastrous endings for that.

5 No more of this fossil fuel disaster and no more
6 setting us up for huge emergencies, such as earthquakes and
7 Tsunamis taking out power plants. We need to stop this now.
8 So, please listen and protect our rivers and our people and
9 our property owners, and please do not approve this project.

10 MR. FRIEDMAN: Thank you for your comment. Susan
11 Dulles, and if I mispronounce your name, please correct me.

12 MS. DULLES: I'll correct it for the record. My
13 name is Susan Dulles. This is to the PERC staff,
14 Commissioners, and other interested parties.

15 My name is Susan Dulles. I live in the Evans
16 Creek watershed on Sight Creek Road, range 4, West Township
17 34 South, Section 26 in the Dutte Falls BLM resource area.
18 I've spent 30 years commenting on various BLM project
19 through the NEPA process.

20 I'm extremely concerned and appalled about the
21 Jordan Cove Pipeline, which will go through out Dutte Falls
22 resource area. Even though I don't personally live that
23 close -- I'm about 20, 30 miles away -- I believe the
24 character and quality of life, our entire resource area and
25 that of the Rogue Valley will be negatively changed by this

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1 intrusion.

2 This pipeline will cross 379 bodies of water,
3 including five major rivers. It will affect the community
4 of Trail Creek on the Rogue River, which is a major Coho
5 spawning area. I'm personally familiar with that area where
6 I have written comments on various ELM projects. This
7 project will destroy that watershed and seriously threaten
8 the Coho Fishery on the Rogue River.

9 I'm totally opposed to the idea of tunneling
10 under the Rogue River, which is a major body of water for
11 recreation and tourism. Water quality limited streams are
12 already a problem for our southern Oregon fisheries. The
13 potential damage to riparian zones and sediment delivery
14 could have major impacts on the stressed fish populations,
15 some of which are endangered, such as the Coho.

16 Now, accidents, the possibility of accidents due
17 to leaks and possible explosions are made more probable by
18 the lower safety standards approved for rural areas, the
19 possibility of fires due to explosions caused by leaks are
20 especially of concern in southern Oregon when summer drought
21 conditions are the highest.

22 Fires spread rapidly in this area. The companies
23 chosen to build a pipeline, Williams and FPLM, have poor
24 safety records. FPLM is still fighting lawsuits from the
25 City of San Bruno over the destruction of houses and

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1 properties caused by gas leaks a number of years ago.
2 Private property, most private landowners that
3 are impacted by this project are opposed to it. As a
4 landowner, I can empathize with these people. The use of
5 eminent domain for the right-of-way by a foreign company
6 against American landowners should be illegal. The
7 compensation received in most cases will not be what the
8 land is worth.

9 MR. FRIEDMAN: Thank you for your comments.

10 MS. DULLES: Okay.

11 MR. FRIEDMAN: You can put additional comments
12 into the record by sending us a letter. Thank you.
13 Elizabeth Hallett.

14 MS. HALLETT: My name is Elizabeth Hallett,
15 E-l-i-z-a-b-e-t-h, H-a-l-l-e-t-t. I live in Ashland, 938
16 Mountain Meadows Circle.

17 I speak on behalf of those without a voice, the
18 children unborn or too young to understand, our children and
19 grandchildren, and in my case, great grandchildren. We must
20 all place a high priority on leaving for future generations
21 a planet that offers to them conditions resembling the
22 hospitality that it's offered to us.

23 Unfortunately, the scientific evidence is as
24 clear as science ever gets. The planet is warming. Human
25 actions are largely responsible to emitting gases from

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PM2-3 See the response to IND1-1.

1 fossil fuel distraction and consumption. And fellow
2 citizens, we are subsidizing these fossil fuel people to the
3 tune of \$5 billion every year. Look it up on the Internet.

4 The projections are equally clear without our
5 concerted and urgent action within a few decades the current
6 trajectory of greenhouse gas emissions will cause the planet
7 to cross a critical tipping point of warming. We do not
8 know exactly when that will be, but the math tells us that
9 we could easily emit enough pollution within the next 14 to
10 15 years to shoot through the internationally-agreed target
11 limit of 2 degrees centigrade.

12 The math tells us furthermore that to keep global
13 warming below the critical 2 degrees of centigrade target we
14 must leave most of known fossil fuel reserves in the ground.
15 It is incumbent upon all of us in our individual daily lives
16 and through government policy to minimize the emissions of
17 greenhouse gases however we can.

18 We are here to urge the Federal Energy Regulatory
19 Commission to exert the leadership that your responsibility
20 to the future demands. Please evaluate this proposed
21 pipeline in relations to its potential impact on global
22 warming and global climate chaos that it would cause. We
23 must have a low carbon future for the sake of our
24 descendants as well as ourselves. Thank you very much for
25 listening.

PM2-3

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PM2-4 Comment noted. See the cumulative effects analysis in section 4.14.

1 MR. FRIEDMAN: Thank you. So, this will be
2 Louise Chawkat, and after Louise we have Diane O'Farrell,
3 Derrick M. Chase, John Peterson, If all of you will come to
4 the front, I would greatly appreciate it.

5 MS. CHAWKAT: Louise Chawkat, C-h-a-w-k-a-t, and
6 I am representing SOCAN, Southern Oregon Climate Action Now.

7 The critical climate role of FERC, FERC's
8 responsibility in analyzing this proposal is clearly stated
9 in the DEIS itself, evaluating the need and public benefit
10 of the project. FERC acknowledges the need to evaluate the
11 project in terms of the National Environmental Protection
12 Act.

13 The chairwoman of the President's Council on
14 Environmental Quality has stated quite clearly that in
15 evaluating the environmental impact under EPA agencies know
16 they should consider greenhouse gas emissions. FERC
17 acknowledges also that the evaluation should include
18 cumulative environmental impacts of the project and
19 alternatives. Additionally, FERC acknowledges that
20 evaluating the cumulative environmental impact should
21 include consideration of the impact of this project along
22 with other past, present, and recently foreseeable future
23 actions regardless of what agency, federal or non-federal or
24 persons undertakes such actions.

25 We are here to encourage FERC to conduct exactly

PM2-4

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PM2-5 **Cumulative impacts are address in section 4.14 of the EIS.**

1 the kind of analysis that it is authorized to undertake,
2 including the cumulative environmental impact of this and
3 other projects. Thank you.

PM2-4
continued

4 MR. FRIEDMAN: Thank you for your comment. Next
5 is Diana O'Farrell.

6 MS. O'FARRELL: Thank you. My name is Diana
7 O'Farrell, D-i-a-n-a, O- apostrophe -f-a-r-r-e-l-l. I'm a
8 citizen of Jackson County, Ashland, Oregon, and also a
9 citizen of our planet. I also am here to represent SOCAN.

10 Despite the Federal Energy Regulatory
11 Commission's clear authorization to examine cumulative
12 environmental impacts of the Jordan Cove Export Terminal
13 Pacific Connector Pipeline, its Draft Environmental Impact
14 Statement, the DEIS, has made some confusing statements that
15 must be addressed more clearly.

16 We ask that FERC specifically reexamine its
17 assumption that the project does not demand increased use of
18 fossil fuel extraction. And further, that FERC take this
19 into consideration when examining the cumulative
20 environmental impacts of the project in evaluation of the
21 project's public benefit.

PM2-5

22 In its draft statement, FERC claims its analysis
23 precludes consideration of out-of-scope issues such as the
24 need to export liquid natural gas, horizontal hydraulic
25 drilling through shale formations during exploration for

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1 natural gas, which is referring to its fracking, induced
2 production of natural gas, life cycle cumulative
3 environmental impacts associated with the entire liquid
4 natural gas export process, et cetera.

5 FERC also claims the life cycle cumulative
6 environmental impacts from exploration production and
7 gathering the natural gas, transportation in Pacific
8 Connector Pipeline and shipment of the natural gas overseas
9 from the Jordan Cove terminal are far beyond the
10 jurisdictional authority of FERC.

11 Despite these claims, its draft statement argues
12 that induced or additional natural gas production is not a
13 reasonably foreseeable indirect affect of the project and is
14 not addressed. This is confusing since the Department of
15 Energy states "According to Jordan Cove, this project will
16 support increased production of natural gas from shale
17 formations."

PM2-6

18 Furthermore, the FERC analysis states that
19 "Existing transmission pipelines in the Western states are
20 underutilized." So, in this case, there is surely no need
21 for the project unless it is expected that further natural
22 gas will be extracted to meet the expectations of Jordan
23 Cove which, of course, the Department of Energy knows is the
24 case.

PM2-7

25 The Federal Energy Regulatory Commission must be

PM2-6 See the response to IND1-2.

PM2-7 There is no evidence that exporting LNG would induce additional domestic natural gas production. Right now, with virtually no LNG exports from the United States, domestic natural gas production is increasing.

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1 made to revive what it was clearly given authorization to
2 do, to examine cumulative environmental impacts of the
3 Jordan Cove Export Terminal Pacific Connector Pipeline and
4 give a thorough impact statement. "Clear" is the operative
5 word. Without it no intelligent conversation can be had
6 about the project, which should lead to the best decisions
7 about our present and future environmental and economic
8 concerns that will impact us for decades to come. Thank
9 you.

10 MR. FRIEDMAN: Thank you for your comment. Next
11 we have Mary Ann Shank, Doug Peterson, Donna Swanson, Tom
12 Collett, and Harry Foster. Again, I ask everyone to come to
13 the front so that they're ready to speak.

14 MS. SHANK: My name is Mary Anne Shank,
15 S-h-a-n-k. I represent SOCAM, and I live here in Klamath.

16 Why, I ask, why are we even debating this? What
17 possible benefit does it provide to our environment, our
18 forest, our wildlife, or even to ourselves? The answer is
19 simple, none; none whatsoever.

20 Consider the environment. A lot is being said
21 tonight about the pipeline's present and future effect on
22 our environment, and all of it is valid. This project would
23 be devastating to the environment. Consider the impact on
24 wildlife alone.

25 FERC acknowledges that the project "Would Result

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1 in impacts to 63 species on 386 known sites across the BLM
2 and forestlands in Coos, Douglas, Jackson, and Klamath
3 Counties. The project would negatively impact 11
4 threatened, endangered or other established species.
5 Briefly put, we'd be killing them.

6 The land management plans were carefully designed
7 over many years to protect forest, health, and wildlife.
8 Now, we have a project in front of us that does nothing but
9 kill that wildlife, and we are asked to breach the land
10 management plan. Why I ask? Consider too the old growth
11 forest. It cannot be replaced at any cost, yet 10 percent
12 of the length of this project passes through Lake
13 Successional reserve forests. It is hard to explain the
14 mystery, the magic of the old growth forest until you have
15 walked through it, like on the Oregon Women's Land Trust
16 Land.

17 It's not just another forest. There are no other
18 forests on Earth like these forests. Each old growth forest
19 is a compact ecological system unto itself, each a unique
20 home to beautiful, rare creatures. Go, spend a day out
21 there, then tell me that we should allow 100-yard wide
22 clear-cutting across thousands of acres, polluting streams
23 and creeks, killing the fish in those streams, desecrating
24 an ancient ecosystem, and endangering wildlife that has been
25 placed in our care.

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PM2-8 See the response to IND6-1.

1 And the devastation is not just for today. It is
2 forever. Any oil spill, any, will create environmental
3 havoc that we will never recover from, and there will be oil
4 spills.

5 Have you wondered why California and Washington
6 are not fighting this battle? They're too smart. They
7 won't allow it in, so the oil companies came to Oregon,
8 hoping that we are perhaps dumb enough to let them in.
9 Well, we're not. Let's stop it here.

10 MR. FRIEDMAN: Thank you for your comments. Doug
11 Peterson and after Doug is Donna, Tom, and Anthony.

12 MR. PETERSON: As a part of southern Oregon
13 climate action now joins -- I should no better, shouldn't I.

14 All right, my name is Douglas Peterson,
15 D-o-u-g-l-a-s, P-e-t-e-r-s-o-n. And as a part of southern
16 Oregon Climate Action Now's joint statement, this is a cost
17 benefit analysis and concluding remarks of our five-part,
18 joint statement of today.

19 It is clear that it is within FERC's purview and
20 discretion to include the impacts of natural gas fracking
21 and potential greenhouse gas emissions related to this
22 project as part of the analysis of the ecological impacts of
23 the project.

24 The Federal Energy Regulatory Commission has made
25 a serious error in not including these impacts with this

PM2-8

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PM2-9 **Comment noted.**

1 draft statement. There can be little doubt that the
2 combined Pacific Connector Pipeline and Jordan Cove Export
3 Terminal projects will directly and indirectly contribute
4 substantially to global greenhouse gas emissions.
5 The main benefactors of this ill-conceived
6 project are not the people of Oregon or, indeed, the
7 American people at all. Corporate profits and executive
8 salaries of the Canadian corporation Veresen are at stake,
9 not the needs of the people.
10 On the bright side, the terminal project promises
11 some short-term construction jobs, though FERC states in its
12 own writings of 250 jobs, 130 would likely be local, the
13 rest expected to come from out-of-state. Pipeline
14 construction of about eight months will employ 280 people,
15 perhaps half of those jobs sourced locally.
16 When completed the terminal will provide only 145
17 permanent jobs of which 45 are likely to be imported labor,
18 this leaves a net of 100 additional Oregon jobs. When
19 completed the pipeline itself will only have a permanent
20 staff of five, five long-term jobs as net benefit to our
21 communities in Oregon.
22 Jordan Cove will be one of the largest greenhouse
23 gas emitting projects in Oregon, probably soon to be the
24 largest, one of the largest in the world.
25 Members of the committee, attending Oregon agency

PM2-8
continued

PM2-9

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1 representatives, fellow citizens, please ask yourself what
2 will we say to our grandchildren when they ask you what you
3 did to slow the rate of global warming impacts? We urge
4 FERC Commissioners to reconsider the true cost of this
5 project and take into consideration its impact on our
6 children and grandchildren.

7 MR. FRIEDMAN: Thank you for your comments.
8 Donna, come up.

9 MS. SWANSON: Donna Swanson, D-o-n-a, S-as in
10 Sam-w-a-n-s-o-n. I have my worker bees bringing up a visual
11 aid because I was reviewing some of the characteristics of
12 what's going to happen I was overwhelmed by size, like 400
13 rivers. Four hundred rivers are going to have this huge
14 tunnel going underneath.

15 This is the 36-inches that's really 3 feet, and
16 that's the size of this pipeline. It's not small. It's
17 going under 400 rivers. And if you'll show the rivers, I
18 put 400 dots on that piece of paper there to show you what
19 400 rivers look like. It's not, of course, the route
20 because I couldn't fit them all in that spot, but 400 rivers
21 are going to have this huge pipeline going through them.

22 Okay, so I'll start like I wrote it. I have
23 prepared -- oh, I forgot to say, the black dot is the normal
24 pipeline for gas. That's the normal size. This is the size
25 that's being proposed.

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1 Okay, so this is the proposed 234-mile route of
2 the LNG pipeline from Merlin to Coos Bay, and that is what
3 we saw in here (indicating). Along the route, the pipeline
4 will need to traverse nearly 400 streams and waterways and
5 five large rivers, the Rogue, Coquille, Coos, Umpqua and
6 Klamath. This requires tunneling under the rivers and
7 streams, re-routing of the rivers during construction, and
8 severe disruption to the flow of the river and to the
9 habitat fish.

10 The actual pipe is 36-inches, 3 feet in diameter,
11 compared to the average 8- to 9-inch gas pipeline. The
12 pipeline will carry methane gas, a colorless, odorless gas
13 to be liquefied at the proposed facility at the coast and
14 shipped to foreign countries. This is an unbelievable
15 number of rivers we are giving over to untried methods for
16 commercial gain. Why are we being offered as a conduit for
17 the transport of fracked gas from Canada and U.S. for
18 export?

19 It is not for the public good not to help the
20 jobless in Coos Bay and environs. It is for export to Asia
21 and the financial benefit of Veresen, a Canadian firm. This
22 company will be causing the public to pay for the cost of
23 global warming simply from the leakage of the methane that
24 occurs in the transportation and delivery of the gas. In
25 the event of a leaking pipe or disaster, methane gas is

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1 released and because it is an odorless, colorless gas, its
2 location will be difficult to pinpoint. The value for
3 methane is 35 to 85 times carbon dioxide, depending on the
4 number years assessed. I have a parenthesis there, but it's
5 too complicated, so I'll skip that.

6 Only about 2 to 3 percent needs to leak to negate
7 the combustion advantage of methane over oil and coal. And
8 leak it does from the fracking site through the pipes to the
9 end. The pipeline, route it is located in both earthquake
10 and Tsunami zones, in the event of a disaster we will be
11 paying a great price, both physically and financially. The
12 latest projections say that fracking in LPG has a lifespan
13 of approximately 20 years. It will no longer be profitable
14 to continue the practice of fracking with lower prices, less
15 demand, and fracking coming online in other countries.

16 So, our environment and the natural beauty is
17 being compromised for a very short-term gain, and the gain
18 is not ours. California, Washington protect their
19 coastlines by not allowing this --

20 MR. FRIEDMAN: You've got to wrap it up.

21 MS. SWANSON: Okay.

22 MR. FRIEDMAN: Your comment's in the record.

23 Thank you.

24 MS. SWANSON: Thank you.

25 MR. FRIEDMAN: John Collett.

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1 MR. COLLETT: That's me, John Collett,
2 C-o-l-l-e-t-t.

3 I'm a fisherman, and when you go fishing, like
4 this past summer, you notice that there seems to be a lot of
5 water missing in places that used to be a lot of lake looked
6 like a lot of dirt. You know, we're in a water deficit, so
7 I started reading the environmental impact statement about
8 -- and the first thing that jumped out to me was the water
9 needed, and I'm taking this right off the EIS, 1.7 billion
10 gallons during construction. That's a billion, 1.7 billion,
11 1.3 million gallons per day during operation of the terminal
12 facilities. The pipeline -- and we've already heard this
13 already tonight -- would affect 400 water bodies, some of
14 them multiple times, and they're going to be using 75,000
15 gallons per day for dust suppression, 62 million gallons
16 required for the hydrostatic testing.

17 Now, bear in mind, we're in a water deficit, and
18 the estimates now is that it's going to take several years
19 to pick that up if we go back to normal water us, and we
20 don't know if that's going to happen.

21 I've got a lot more, but I'm going to stop now
22 and let some other people talk.

23 MR. FRIEDMAN: Thank you. Harry Foster, Hannah
24 Schl, Jim Britton, George Logan, Vanessa Cwitzky, and John
25 Hutter. You guys can all come up. That would be great.

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PM2-10 The accident in San Bruno, California was on a non-jurisdictional pipeline.

1 Our next speaker should be Harry Foster.

2 MR. FOSTER: Yes, I'm Harry Foster, H-a-r-r-y,

3 F-o-s-t-e-r. I'm also a fisherman. I'm also a recent

4 transplant to Oregon, to Jackson County, and to Medford.

5 And I come from one of those states that wouldn't allow this

6 to happen. And I saw what happened in San Bruno, and I

7 don't think you ought to allow that to happen here.

8 I don't have the kind of detail that's been

9 presented here tonight, and so I don't really have a lot to

10 add to that. I think it's wonderful information for the

11 FERC to consider very closely, and I urge you to reject this

12 project. Thank you.

13 MR. FRIEDMAN: Thank you. Hannah Sohl.

14 MS. SOHL: Hi. My name is Hannah Sohl,

15 H-a-n-n-a-h, S-o-h-l.

16 So, my name's Hannah. I live in Medford. I grew

17 up here in the Rogue Valley, and I'm the director of Rogue

18 Climate, which is a local organization working to bring more

19 renewable energy here to the Rogue Valley.

20 Those of us who are here to oppose this project

21 have nothing but great respect for the construction workers

22 who were brought here today by their unions. And this is

23 one of the reasons why we work hard every day to push our

24 federal, state, and local officials to see that the

25 transition to cleaner energy like solar and to greater

PM2-10

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1 energy efficiency in all of our buildings and business.
2 And in Oregon, each dollar of that kind of
3 investment can create 17 times more jobs than further
4 investment in natural gas, according to the U.S. Department
5 of Energy's National Renewable Energy Laboratory. And we
6 hope that moving forward our union brothers and sisters who
7 are here tonight will join us in pushing hard for those
8 clean energy investments and making sure that many of those
9 jobs or most of them are union jobs. And we also strongly
10 support other investments that are needed in this country to
11 shore up our infrastructure, including repairs to existing
12 pipelines and rail lines that are decades old, as proposed
13 by the National AFL-CIO.

14 But the issue here tonight is not whether folks
15 here tonight, union brothers and sisters, take pride in
16 their work because we know that they do; but the issue is
17 whether this project is in the public interest or just in
18 the special interest of a few corporations.

19 It will create only a relative handful of
20 permanent jobs, but here's what it'll leave in its wake,
21 increased energy prices, violation of landowner rights, and
22 lower property values, a massive terminal vulnerable to
23 Tsunamis, a pipeline that adds to our region's wildfire
24 risks, especially since the pipeline company has already had
25 three explosion just last year alone, a brand new power

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1 plant that will quickly become the largest source of climate
2 change in carbon pollution in Oregon, increased fracking in
3 the Rockies, which adds to the pollution in those
4 communities, and climate damage for all of us.

5 Here in Jackson County, we are already feeling
6 the negative impacts of climate change on our local economy
7 and also quality of life. A 2008 report called Preparing
8 for Climate Change in the Rogue River Basin of southern
9 Oregon found that without a rapid transition to cleaner
10 fuels and greater energy efficiency we face a reduction in
11 snow pack of at least 60 percent by the time today's
12 newborns enter adulthood, along with increase in severity
13 and frequency of wildfires. And we don't have to guess what
14 that means for local businesses or local jobs here in the
15 Rogue Valley.

16 Last year we lost over a hundred jobs and Mount
17 Ashland never opened because of lack of snow. Many farmers
18 had to forego frost because of the drought. Tourism was
19 impacted when the Rogue River and the Britt, Shakespeare all
20 were closed for a couple of days because of wildfire smoke,
21 which resulted in millions of dollars that was lost from our
22 local economy.

23 This valley has been a magnet for retirement
24 dollars to help support our healthcare industry and many
25 other jobs. And so what will happen if smoke and heat and

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PM2-11 See the response to IND1-1.

1 other impacts of climate change result and the retirees no
2 longer wanted to come here.

3 FERC's Draft Environmental Impact Statement did
4 not even consider the impacts this project will have on
5 climate change. The power plant to the terminal alone, once
6 again, will quickly become the largest source of climate
7 pollution in Oregon, and that doesn't even include the
8 impact of the gas that's shipped overseas.

9 MR. FRIEDMAN: I need you to wrap up now.

10 MS. SOHL: Okay.

11 This project takes us backwards. It takes us --
12 as for the impacts of the few for the benefits are for a few
13 special interests, not for everybody. Please deny this
14 plan.

15 MR. FRIEDMAN: Thank you. Jim Britton.

16 MR. BRITTON: My name is Jim Britton,
17 B-r-i-t-t-o-n. I just got some seat-of-the-pants comments
18 here.

19 I'm a businessman, and from a business person's
20 viewpoint, this project is completely absurd. I mean it's
21 downside for all of Oregon. Oregon gets placed on it all of
22 the risks while the profits of this will go elsewhere,
23 Canada, Wall Street-type billionaires. It's no going to
24 help us.

25 Environmentally, on some different fronts, what

PM2-11

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1 we have is we have tectonic plates at work very near Coos
2 Bay; the cascadia subduction zone currently is overdue for a
3 massive earthquake by some estimates, perhaps a 9.0
4 earthquake, which would be devastating. Coos Bay would be
5 completely shattered, as well as perhaps many sections of
6 this pipeline.

7 While the plan for this is to cross all these
8 bodies of water, there are going to be huge fish losses as a
9 result of running these giant excavators in these rivers to
10 lay this pipe. This is going to kill salmon. Well, hell,
11 we're trying to bring salmon back. So, there you have it.
12 All the risk, no gain. I urge FERC to deny this.

PM2-12

13 MR. FRIEDMAN: Thank you for your comments. Next
14 is George Logan.

15 MR. LOGAN: Hello folks. My name is George
16 Logan, G-e-o-r-g-e, L-o-g-a-n, and I'm an ironworker
17 representing Local 29, Oregon and southern Washington.

18 Anyway, thanks everybody for coming out. I'm
19 glad to see -- it looks like a bigger crowd 'because it's a
20 smaller room, but I appreciate the idea. I'm for the
21 project. I've got a lot of ironworkers stand ready to start
22 doing the project, and ready to have job fairs in the areas
23 that are needed more ironworkers and more building trades.
24 And thanks for coming out again, folks. Thank you.

PM2-13

25 MR. FRIEDMAN: Vanessa.

PM2-12 Impacts on salmon are discussed in section 4.6 of the EIS.
PM2-13 Comment noted.

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1 MS. OWITZKY: Vanessa Owitzky, V-a-n-e-s-s-a,
2 O-w-i-t-z-k-y.

3 I am here on behalf of the trees, and it could
4 equally be said that the trees are here for us. When we
5 clear-cut 42 miles of old growth forest in a 95-foot swath
6 we lose a precious carbon sink.

7 Oregon is one of the most beautiful states in the
8 U.S. to live in because we have clean air thanks to our
9 trees. We have a temperate rainforest no less valuable than
10 the tropical ones. Chief Seattle said the earth does not
11 belong to man. Man belongs to the earth. We don't own the
12 planet. The trees are doing their best, but they can't help
13 us if we keep cutting them down.

14 And now I'm going to read a letter from my dear
15 friend Kathleen L. Dunn, public schoolteacher, and disabled,
16 retired from Ashland.

17 "In my opinion, the fracking pipeline that is
18 planned to be built between Klamath Falls and Coos Bay is
19 not going to happen for the following reasons: economics,
20 temporary jobs will have little impact, even in the
21 short-term. Long-term profits will go to already rich
22 corporations that, not who, get breaks on taxes, so
23 potential trickle-down economic impact both statewide and
24 nationally will be nil.

25 Environmental, the risk of carcinogens and a

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PM2-14 Impacts on waterbodies are discussed in section 4.4, impacts on wildlife in section 4.6. See response to IND6-1.

1 multitude of other drawbacks from fracking are well
2 documented. This pipeline will unquestionably harm wildlife
3 on land and in water, our precious waterways themselves,
4 every bit of vegetation, the land itself, and people. We
5 value the wetlands of the Klamath Basin, the headwaters of
6 our rivers, the earth that gives us life itself, and the
7 vital port of Coos Bay.

8 Our environment here is both sensitive and rare,
9 the most diversified, botanically, short of the tropical
10 rainforests. Don't frack it up.

11 Ethical, please note, people will be physically,
12 emotionally, and psychologically harmed due to fracking.
13 It's happening elsewhere and there is no doubt that it will
14 happen here.

15 For the aforementioned reasons and many more,
16 Keystone is going down and so will this. Southern
17 Oregonians may be small in numbers, but will not let this
18 happen.

19 In conclusion, the planned fracking pipeline
20 between the Klamath Basin and Coos Bay can be summed up in
21 one word, obscene." Thank you for your full attention to
22 this issue.

23 MR. FRIEDMAN: Thank you for your comments. John
24 Hutter, Lesley Adams, Stefan Gala, and Janet Ievins. So,
25 those of you can come to the front and again, I'm really

PM2-14

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1 sorry if I mangled your name.

2 MR. HUTTER: You did a good job. So, my name is
3 John Hutter, J-o-h-n, H-u-t-t-e-r. And I'm an electrician
4 with the International Brotherhood of Electrical Workers.

5 This project, for us, is local work. Anything
6 within six hours is local work, but I want to speak more
7 about, you know, safety and the environment because I think
8 that's what you guys really want to hear.

9 So, first and foremost, I'm a father, a kayaker,
10 a fly fisherman, and 20 years in the electrical trade. We
11 recreate on the Rogue River, throw those hooks, the whole
12 nine years. This is where we play.

13 I want you to know that our Union was founded on
14 safety, and because of that you're looking at a group of 250
15 electricians here locally that put monies into our schools,
16 that put monies into co-ops, organic foods, things of that
17 nature. But as far as safety, we're the best trained. I've
18 worked on two of these pipelines locally in the Modoc
19 County, and I can tell you the first thing that we did in
20 the morning was about an hour's worth of safety meeting.

21 You have a full-time safety person on that
22 project, walking through the project. You also have an
23 inspector that every step of the way, whether you're an
24 electrician or you're on that pipeline and it's being
25 x-rayed or welded to look at every aspect, every aspect of

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1 that project.

2 So, I guess what I want to say is if the union
3 does this, and it does go through, we're going to treat this
4 property like it's our own backyard. And if soil comes out
5 of the ground, it's going to go back just the way it was.
6 We have a lot of pride in this area, and this is how we
7 operate.

8 So, I want to thank you for the time to speak,
9 and for everybody that's here. Thanks.

10 MR. FRIEDMAN: Thank you for your comment.

11 AUDIENCE MEMBER: Can I yield my three minutes to
12 somebody else?

13 MR. FRIEDMAN: You may.

14 AUDIENCE MEMBER: Okay, I'm going to yield them
15 to Lesley Adams.

16 MS. ADAMS: Good evening. Hi. My name is Lesley
17 Adams, A-d-a-m-s, A-d-a-m-s. I want to thank everyone for
18 coming out tonight.

19 And the first thing I want to say is the room
20 capacity is unacceptable. I think it was already stated
21 that that was a mistake, and I want to say the mistake was
22 unacceptable.

23 Paul, you've been on this project, I think, for
24 seven years, as long as I've been monitoring this project.

25 MR. FRIEDMAN: I've been on this project for 10

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PM2-15 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

1 years.

2 MS. ADAMS: Okay, 10 years. Pause my time,

3 please.

4 MR. FRIEDMAN: It's not your time. I'm speaking,

5 all right.

6 What I said at the beginning of this meeting is

7 that I'm going to go back to Washington, D.C. and talk to my

8 supervisors and try and do another meeting back at Medford

9 very soon.

10 MS. ADAMS: I appreciate that. In line with

11 that, this project has been going for, okay, about 10 years.

12 I've been monitoring it since about 2007, and I think these

13 multinational energy companies have a filthy amount of

14 money, and they've spent a lot of time and access to our

15 federal officials, and we've only been given 90 days to

16 review a document that's thousands of pages long. And I

17 think at the very least our government should give us a

18 30-day extension so that we can review this document over

19 Thanksgiving, Hanukah, Kwanza, Christmas, and New Year.

20 We just happened to get it during the holidays,

21 and it's a lot of information for us to digest. The energy

22 companies have had years to perfect their application. We

23 should be given at least 120 days to review this document.

24 So, I'm officially asking for a 30-day extension.

25 I clearly have a lot of concerns about the local

PM2-15

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1 impacts. I'm not going to get into them right now. I have
2 a lot of concerns about impacts to water quality streams and
3 salmon. I want to know if anyone from Oregon DEQ is here.

4 Thank you. Bill Myers from Oregon DEQ is here.
5 Oregon DEQ has a public comment period open right now, and I
6 hope that they will be having a public hearing as well.

7 Addressing the two big gaps in the DEIS, number
8 one is fracking. Clearly, this is a connected action. You
9 cannot fill a pipeline for export unless you frack more gas
10 in the Rockies, and so to say that it's not something you're
11 going to address in this DEIS is absurd. It's a connected
12 action. It must be analyzed.

PM2-16

13 The second issue is climate change. The DEIS is
14 saying we're just not going to deal with it, and it's like
15 me saying that I'm not going to potty train my toddler
16 because I don't want to think about it. But the reality is,
17 the shit is coming and we should do our best to prepare for
18 it. And preparing for it, we can look to the
19 Intergovernmental Panel on Climate Change and the reports
20 that they're coming out are frightening. They're saying by
21 2050 we must have 80 percent of our emissions reduced, by
22 2050, which might seem like a ways away, but it's actually
23 -- my son will be my age in 2050. And at that point, we
24 will have needed to reduce our carbon emissions by 80
25 percent.

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PM2-16 See the response to IND6-1.

PM2-17 See the response to IND1-1.

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1 And right now we're talking about building
2 infrastructure to increase our emissions, to be the largest
3 emitter of carbon dioxide in -- methane in Oregon. It's
4 ridiculous. It's absurd. And I'm extremely disappointed
5 that our government is not analyzing climate change in this
6 document, and they should.

7 I want to close by saying a quote that I think is
8 often attributed to Martin Luther King, which is "The arch
9 of moral history is long, but it tends to bend towards
10 justice." And I hope to God that that is the case here, and
11 that we stop this project because it needs to be stopped.
12 Thank you.

13 MR. FRIEMAN: Thank you for your comments. So,
14 if everyone could be at the front it would be greatly
15 appreciated.

16 MR. GALA: My name is Stefan Gala, S-t-e-f-a-n,
17 Gala, G-a-l-a. I'm a Rogue Valley native, born and raised
18 here, grew up in Trail.

19 I am an ISA certified arborist and tree trimmer
20 with over 20 years experience. I know the impacts to the
21 rivers and streams by building these trenches for the
22 pipelines are going to increase sediment and the clearing of
23 these streamside forests are also going to increase the
24 temperatures of these rivers. I know from my own personal
25 experience that, legally, I can't even touch blackberries in

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1 riparian areas. These are noxious weeds, let alone
2 clear-cutting these streams.

3 This pipeline is going to affect hundreds of
4 fish-bearing waterways, over 230 miles of public and private
5 lands, forest and marine habitat and wildlife. It's going
6 to cause a 90-foot clear-out through 75 miles of public
7 lands, 42 of those miles are through old growth forests.
8 The pipeline terminal and the shipping of liquid gas will
9 impact 32 species protected under the Endangered Species
10 Act, and this number is increasing.

11 The Jordan Cove terminal will be the second
12 largest greenhouse gas emitter in Oregon. If this project
13 goes through, fracking in the interior West and Canada would
14 dramatically increase. Fracking and its impacts were not
15 considered in the Draft Environmental Impact Statement, even
16 though the company's stated purpose and need for the project
17 is to increase fracking.

18 The project's DEIS fails to acknowledge the
19 impacts this project would have on climate change even
20 though recent reports from the Intergovernmental Panel on
21 Climate Change determined that by 2050 we must reduce our
22 reliance on fossil fuels by 80 percent.

23 Landowners are also being faced with eminent
24 domain for the benefit of this out-of-state private energy
25 company. This is not what the intended use of eminent

PM2-18

PM2-19

PM2-20

PM2 Continued, page 51 of 152

PM2-18 See the response to IND1-2.

PM2-19 See the response to IND1-1.

PM2-20 See the response to IND1-4 and IND1-7.

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1 domain was for. FERC failed to consider the impacts of the
2 LNG terminal built on the earthquake subduction and Tsunami
3 zones. There is no plan in place for these two 80-million
4 gallon tanks of liquefied natural gas if the power goes out,
5 such as it did in Fukushima.

6 And you can look, the geologist say that we are
7 long overdue for a Fukushima-type earthquake over 9.0 or
8 greater, over 75 years overdue. They happen very 400 years.
9 We're 75 years overdue.

10 In 2014 alone, Williams, the pipeline company had
11 three gas facility pipelines explode, causing serious damage
12 and great risks to human lives. FERC allows lower safety
13 standards for the pipeline in rural areas, which would lead
14 to greater risks for leaks and breaks of explosion because
15 there's less people that live there, so you'd have less
16 people die. That's ridiculous.

17 Also, exporting of our natural gas will cause our
18 prices to compete on the world market, undermining American
19 energy independence while raising our gas prices by up to 25
20 percent.

21 Also, the Department of Energy has determined
22 that exporting natural gas could cause up to 1.2 million
23 manufacturing jobs to be lost to overseas factories, 1.2
24 million manufacturing jobs lost here in the United States.
25 Not a gain of jobs, a 1.2 million job -- manufacturing job

PM2-21

PM2-22

PM2-23

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- PM2-21 See the response to IND1-7.
- PM2-22 See the response to IND1-4.
- PM2-23 Comment noted.

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1 loss.

2 MR. FRIEDMAN: Please wrap it up now.

3 MR. GALA: Thank you.

4 MR. FRIEDMAN: Thank you for your comments.

5 Janet Ievins.

6 MS. IEVINS: My name is Janet Ievins,

7 I-e-v-i-n-s.

8 The speakers here have already covered all my
9 points. I did want to mention jobs. Everyone here is
10 concerned about jobs. I would like to say that the tradeoff
11 seems to me, from what I see on the DEIS, that we will,
12 indeed, lose more jobs than we gain. And I think that the
13 folks who are hoping and praying for good, steady jobs are
14 being shafted by the gas company and our rural economy
15 depends upon clean air and water for fisheries and
16 agriculture and vineyards, and those will go, and it's not
17 fair. It's not fair to anybody. And the gas companies
18 don't care if it's fair. They're going to get you.

19 MR. FRIEDMAN: Thank you for your comments. Ms.

20 Schl.

21 MS. SCHL: My last name is S-e-h-l, and I
22 represent the Congressional United Church of Christ in
23 Ashland, and also Rogue Climate.

24 (Singing with Ukulele): The proposed LNG
25 pipeline would threaten our streams, take over our land

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1 rights, and dismantle our dreams. The clean energy future
2 we hope to create will take big steps backwards with this
3 gas export fate. And what's the necessity of eminent domain
4 when all of the profit is for corporate gain?

5 Our costs will be doubled for power a year while
6 fracked gas shipped to Asia and to the atmosphere. There's
7 400 streams and rivers wiped out, old growth trees, and
8 threatening the crabbing and the fishing industries. A
9 power plant to liquefy natural gas would become the worst
10 thing that Oregon has. It's time for the climate to stay in
11 the realm 'cause game over for the climate has a terrible
12 sound.

13 So, don't build us the pipeline in Oregon State,
14 but add wind, wave, and solar to our energy slate. We need
15 local power renewable and clean. Investing in fossil fuels
16 will not keep us green.

17 MR. FRIEDMAN: Thank you for your comment.
18 Taylor Swift is jealous. John Clarke, you're the next
19 speaker.

20 MR. CLARKE: John Clarke, C-l-a-r-k-e, milepost
21 60.

22 I would like to take just a minute and make a
23 comment to the crowd because they weren't there last night,
24 and I kind of want to take off from where I left last night.

25 I brought up the point that there was no gas

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1 being dropped off the Pacific Connector Pipeline. They say
2 they're dropping it off, but they're picking it right up and
3 taking it to Jordan Cove in another pipeline, so that's out
4 of the way.

5 I also submitted a budget -- a contract between
6 Jordan Cove and the Coos County. And in that contract it
7 shows that Coos County has received over \$2 million from the
8 applicant.

9 So, I'm going to relay something that happened to me
10 personally in 2012/13. I entered an appeal against the
11 planning director for a decision which he made about the
12 airport, the North Bend Airport and Jordan Cove. I claimed
13 that it did not meet the local laws.

14 So, let us see what \$2 million bought the
15 applicant. We were about into that appeal for three months,
16 and one day I get a letter, and that letter says the
17 applicant has withdrawn their application and the Planning
18 Department has changed their rules, and they took the
19 airport overlay out of the industrial planning. They took
20 out the review process part of the land use plan so that it
21 became an administrative decision and they didn't have to
22 look at the output. So, that's what they got for their \$2
23 million. That's a pretty good buy.

24 As to date, they haven't re-filed because as on
25 the 15th of this month the Coos Bay -- the Board of

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1 Commissioners is going to rule on changes to the
2 comprehensive plan. When your local government is -- and I
3 know this -- FERC does not enforce laws. I also know that
4 the state agencies don't enforce local laws, and the federal
5 government -- and the FAA is going to look at it. And
6 they're going to look at only the height of this thing, and
7 that's 167 feet. And yet, the local ordinance said 135
8 feet; yet, it's 46 feet.

9 There are high lying towers in front of that
10 airport that over 150-feet tall. The maps that I showed you
11 the other day that showed the pipeline on that bridge those
12 aren't underground. They're above ground, and that's at the
13 end of the airport. What's in that primary impact areas are
14 those liquefaction trains.

15 It isn't just the earthquake. It isn't just the
16 Tsunami. It's an accident from the airport. Thank you very
17 much.

18 MR. FRIEDMAN: Thank you for your comment. Mr.
19 Clarke speaks at all of our meetings, and has for years, and
20 everything he has to say can be found online because these
21 transcripts of these meeting our put into our E-Library
22 system, so if you want to see what he said yesterday, when
23 it comes online you can read it. Thank you. Now, Clarence
24 Adams.

25 MR. ADAMS: Clarence Adams, C-l-a-r-e-n-c-e,

PM2-24

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PM2-24

Our analysis of potential Project-related impacts on the Southwest Oregon Regional Airport in North Bend can be found in section 4.10.1.4 of the DEIS. In their December 17, 2009 Order Granting Authorizations under Section 3 of the Natural Gas Act and Issuing Certificates for the original Jordan Cove LNG import proposal in Docket No. CP07-444-000, the other four sitting Commissioners disagreed with and overruled Mr. Wellinghoff's dissent. In a letter to the Commission dated December 22, 2014, commenting on our November 2014 DEIS for this Project, the Southwest Oregon Regional Airport and Coos County Airport District stated that it "strongly concurs with (the) recommendation (in the DEIS for Jordan Cove to document consultations with the Federal Aviation Administration [FAA] and submit the results of studies before Project construction) and believes that the FAA process will assure that the Airport continues to operate safely and efficiently."

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1 A-d-a-m-s. I'm an affected landowner, milepost 55.8, and I
2 represent Landowners United.

3 Ninety percent of the landowners believe, with
4 everybody in this room, that this is a bad deal. What makes
5 it worse is they're underrepresented in this Draft EIS. I
6 will point out a few things to back that up.

7 FERC has believed Williams when they that the
8 DEIS found no negative impacts to land values by having a
9 pipeline on the property. Yeah, well, there's more. It
10 gets better.

11 They quoted a study from the Medford pipeline,
12 which is a 10-inch that comes from the North, and they
13 compared that 10-inch pipeline to the 36-inch pipeline that
14 they're proposing on my property. I don't quite think
15 that's apples and oranges or quite fair. It pisses me off.
16 Sorry.

17 The size of the pipe is never mentioned in any of
18 the other studies, models, and regressions stated in the
19 DEIS. The pipeline has had an affect on property values.
20 We had an elderly couple in Klamath Valley there was a
21 quarter million dollar land deal because the perspective
22 purchaser heard there was a pipeline going through their
23 property. I know of two instances where buyers were turned
24 away from looking at homes in the Clarks Branch Road area
25 because they heard the pipeline was coming through.

PM2-25

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PM2-25

It appears reasonable that if a 10-inch-diameter gas pipeline and associated right-of-way cross one's property and it does not have a large effect on property values in the project area, neither would a larger pipe.

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1 If the Pacific Connector gets approved,
2 landowners will get a one-time payment to cover the
3 detrimental effects of having a pipeline on their backyard,
4 in many cases for the rest of their lives. I would like to
5 see more protection for landowners and their lands in the
6 final EIS and with the inclusion of an example of a contract
7 as part of that EIS, and a little bit more beefed up
8 economic, socioeconomic analysis for landowners ins the EIS.

PM2-26

9 There's also a couple of points I'd like to clear
10 up. Page 5.2 of the DEIS states applicants have received
11 all necessary conditional use permits from affected
12 counties. That's a false statement. They have not received
13 conditional use permits from the coastal zone management
14 areas for Douglas and Coos County. Those are still under
15 appeal. Page 5.6 states "The land to be used by the Klamath
16 Falls compressor station is not irrigated and not used for
17 crops other than hay."

PM2-27

18 Well, I beg to differ. A dairy land hay farm is
19 a crop, providing high quality hay and has been used in the
20 West for years and will continue to do so. Thank you.

PM2-28

21 MR. FRIEDMAN: Thank you for your comments. MR. BARKER:
22 Okay, so my name is Bob Barker. That's first Bob, and
23 B-a-r-k-e-r.

24 We live 340 feet from the proposed drill entry
25 site underneath the Rogue River, so we treat this project

PM2 Continued, page 58 of 152

PM2-26 Eminent domain is covered by existing laws. FERC has no authority to revise these laws.

PM2-27 Comment noted. The applicant has received the permits, which are being appealed.

PM2-28 The statement is correct as written; it states "not used for crops other than hay." Hay is a crop; the field is not used for any other crop.

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1 like it's in our backyard because it is. Through my
2 wonderings through the EIS last night I came across --
3 sorry.

4 Through my wonderings through the Draft EIS last
5 night, I came across Appendix E, which has about 30 pages of
6 Pacific Connector's proposed site-specific variances to
7 FERC's wetland and water body procedures and upland plans.
8 How are we going to know or when will we know what happens
9 when these various variance request? Is that something you
10 can answer here or before the final report? What's that?

11 MR. FRIEDMAN: I'll address that question in the
12 FEIS.

13 MR. BARKER: Okay, so we have to wait until then.
14 So, for instance, with regard to the Rogue River Crossing,
15 so these temporary extra work areas that are required for
16 the Rogue River horizontal directional drill, pipe pull back
17 areas, and to access the river for water source, hydrostatic
18 testing, HTD, and dust abatement, and so I think the plan is
19 to pull about 8 million gallons of water out of the river
20 for the hydrostatic testing. And this is the first I knew
21 that there was going to be -- you know, they're going to be
22 pulling out water for dust control, which would mean the
23 building of an extra road. So, the question is how -- you
24 know, how we interface with these and get the answers for
25 this specific information?

PM2-29

PM2-30

PM2 Continued, page 59 of 152

PM2-29 The EIS is not a decision document. The FERC order will decide whether to accept some or all of these variances.

PM2-30 Water for dust control, including for the Rogue River HDD crossing, is discussed in section 4.4.2.2. See table 4.4.2.2-9 for the estimated water use associated with the Rogue River HDD crossing. The detailed project maps in appendix C show the roads proposed for use. The HDD Contingency Plan was attached as Appendix H to Resource Report 2 of Pacific Connector's June 6, 2013 application with the FERC. The entire application is available in electronic format for public viewing via the internet on the FERC webpage (www.ferc.gov) through our eLibrary system. As stated in section 2.3.2.1, the right-of-way would be used as the primary transportation corridor. The use of new and existing roads is also discussed in the section, and section 4.10 includes information on roads.

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1 It also talks about temporary extra work area is
2 located across intermittent drainages, ground disturbing
3 activities will be minimized through the use of roller to
4 expand these drainages. I have no idea what drainages and
5 what rollers they're talking about.

PM2-31

6 The DOE engineer's report with regard to the
7 crossing, with regard to our side says the -- you know, the
8 entry workspace will likely require clearing and extensive
9 grading improvements prior to construction. Do I have to
10 wait until the very end to find out what those are to
11 negotiate how extensive that is when I'm trying to determine
12 what the damages are to our property? Do we get any
13 indication of what those terms mean? It's a rhetorical
14 question. I don't know if I can get answers in the EIS, but
15 I hope I will.

PM2-32

16 With regard to the Rogue River Crossing, I have
17 maintained for a long time and for any reason the HTD fails
18 -- if I understand correctly there are three attempts before
19 a final failure is determined ^^^^ that there is no
20 agreement or no language in this Draft EIS about what the
21 alternatives are. There were on the input side, and so I
22 think that, you know, in the event of a failure we must stop
23 the project until we have permitting for any alternative.
24 We cannot allow, because of the impact, to proceed without
25 that.

PM2-33

PM2 Continued, page 60 of 152

PM2-31 It is not clear what text or procedure the commenter is referring to.

PM2-32 Much of this information will not be available until the project design phase, which would only happen if the project is approved by FERC and receives federal and state permits.

PM2-33 If the HDD is not feasible, a direct pipe technique would be employed. See pages 4-385 to -386. HDD is discussed in the following subsection.

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1 I'll provide detailed comments, of course, in
2 writing at a later time. Thank you.
3 MR. FRIEDMAN: Thank you for your comment.
4 MS. KALVELAGE: I'm not Stacey Smith. She
5 decided to submit her comments in writing, given the people
6 waiting. I'm Joan Kalvelage, K-a-l-v-e-l-a-g-e, from
7 Ashland, Oregon.
8 And given the number of people waiting to
9 testify, and the number of people who've already made
10 important points about environmental impact, I won't
11 reiterate those. I would just like to raise a process
12 point, which is, not only is the time for public input very
13 short, disproportionate, as Lesley Adams pointed out, to the
14 input from the corporate world; but the scale of public
15 input is completely disproportionate to the impact that this
16 will have on our state.
17 There's five hearings. None in northern Oregon,
18 and yet, this state will be -- the entire state, not to
19 mention the country, is influenced by global warming. That
20 cannot be contained to southern Oregon.
21 I talked yesterday to friends who got back from
22 Roseburg at 3:00 o'clock in the morning because that's the
23 only avenue available for Portlanders to talk about how they
24 feel about this. Three thousand Portlanders were
25 demonstrating on the People's Climate March Day in addition

PM2-34

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PM2-34 Comment noted. FERC typically has a 45-day comment period. This DEIS had a 90-day comment period due to the proposed federal land management plan amendments. The Project crossed southwestern Oregon; therefore, the meetings were held in southwestern Oregon.

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1 to the 300,000 in New York. Do you really feel that the
2 avenue for public comment about what we know will be a
3 contributor to global warming, in fact, the greatest in the
4 state is adequate? Do you really believe it's only people
5 in southern Oregon who are going to be impacted by this?

6 Our forests affect the climate. I live in
7 Ashland. Our city managers are not telling us not only is
8 an earthquake overdue. They tell us prepare. It's not if;
9 it's when. We are really going to put these pipelines
10 through this.

11 Now, I'm going to say I would like to speak for
12 the people who can't be here. I have a friend who's a
13 teacher at Coquille Tribe, and in his last year of life he
14 worked hard to stop the export of coal for the same reason
15 that he would be now talking about the export of liquefied
16 gas from Coos Bay. That Tribe had to look at the
17 possibility of short-term, fleeting economic gain in
18 comparison to their native values and the permanent impact
19 on future generations. If Ken were here now, he would say
20 please reconsider this.

21 I know that you are not the decision makers, but
22 you do have some recommendations to make about the scope of
23 the environmental impact statement, which is not including
24 global warming. You can make some recommendations about the
25 time and the scale of the opportunity for public input on

PM2-35

PM2-35 See the response to IND1-1.

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1 this.

2 MR. FRIEDMAN: Stacey, you need to wrap up now.

3 MS. KALVELAGE: Thank you.

4 MR. FRIEDMAN: Thank you. Al Shropshire is next.

5 And after Al, John Williams, Chris Matheson and Allison
6 Laughlin.

7 MR. SHROPSHIRE: Yes, my name is Al Shropshire,
8 spelled S-h-r-o-p-s-h-i-r-e. And I represent Plumbers and
9 Steamfitters Local 290. We have 4,300 plumbers,
10 steamfitters, and pipeliners, mostly that live here in the
11 State of Oregon.

12 And I've heard a lot about permanent jobs. I can
13 tell you that there's -- almost no permanent jobs in
14 construction. By their very nature, we come, we build a
15 project, and we move onto another one. So, I've been in the
16 union for 43 years, and have been temporary help for that
17 entire 43 years.

18 Our 4,300 members build, service, and maintain
19 large industrial projects and pipelines. It's what we do,
20 and we do it with the most modern materials and most
21 advanced welding and construction techniques known to man.
22 Every one of our members wants this project and we want
23 these jobs, but we wouldn't trade the environment for these
24 jobs.

25 Probably some undeserved clapping there because

PM2-36

PM2-36 Comment noted.

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1 we believe that we can have them both. We believe that we
2 can have growth and protecting the environment.

3 MR. FRIEDMAN: Remember we said we weren't going
4 to boo or cheer. We're going to treat every speaker with
5 utter respect, as you want to be treated.

6 MR. SHROPSHIRE: I just kind of have that knack.
7 Our members would like to see that the landowners are
8 treated fairly and the environment is protected. The
9 economic boost to southern Oregon we believe, and the tax
10 base that would be increased here, is in the public
11 interest. I'd like to thank the members of FERC and the
12 panel for being here tonight and allowing everybody to
13 speak. And I'd just like to say I agree we're all in this
14 together, and let's work together. Thank you.

15 MR. FRIEDMAN: Thank you for your comments.

16 MR. WILLIAMS: Good evening. J-o-h-n,
17 W-i-l-l-i-a-m-s. We're speaking on behalf of Local 701.

18 I will discuss this project's impacts on climate
19 change. The Draft Environmental Impact Statement failed to
20 include information that demonstrates the project will
21 actually reduce worldwide emissions for greenhouse gases and
22 will benefit our fight against global warming.

23 At chapter 4, page 895, the DEIS claims the LNG
24 facility operations will emit 2.1 million tons a year of
25 greenhouse gases. This figure misleads the reader for the

PM2-36
continued

PM2-37

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PM2-37 This DEIS analyzes and discloses the environmental effects of the proposed pipeline and LNG terminal. The scope of the Project does not include analyzing world-wide greenhouse gas emissions. The Oregon law (House Bill 3543) is discussed in section 4.12.1.4.

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1 following reason. The Oregon Energy Facility Siting Council
2 will issue an approval to the terminal. FSEC rules will not
3 allow this facility a net increase of 2.1 million tons a
4 year of greenhouse emissions.

5 The DEIS failed to acknowledge that Oregon's
6 rules require the project to mitigate this greenhouse gas
7 emissions. The project's ultimate net greenhouse gas
8 emissions will be far less than the claimed 2.1 million tons
9 a year.

10 The DEIS also stated the project will cause a 15
11 million ton a year increase in greenhouse gas emissions from
12 LNG's final use. Again, this misleads readers. This gas
13 will be burnt in power plants that would otherwise be
14 burning coal. In other words, the project will allow Asian
15 power plants to leave coal in the ground. This will cause a
16 net decrease in those power plant greenhouse gas emissions
17 when gas is utilized instead of coal.

18 The project will export enough gas to displace
19 use of seven coal-fired power plants. If those plants
20 burned coal, they would emit 28 million tons a year of
21 greenhouse gases. Instead, if those power plants use this
22 project's gas as fuel instead of coal, the greenhouse gas
23 emissions from those plants would be only 14 million tons a
24 year for a net benefit of over 10 million tons a year in
25 greenhouse gas reductions.

PM2-37
continued

PM2-38

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PM2-38 Comment noted. An estimate of from emissions using imported U.S. LNG rather than coal in Asian power plants is included in section 4.12.1.4.

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1 The DEIS did cite studies that the project's
2 export of LNG would replace coal combustion by its Asian
3 customers and would reduce substantial reductions in
4 worldwide greenhouse gas emissions. The federal study
5 examined the LNG exported from Louisiana to China and
6 determined that that process would reduce worldwide
7 greenhouse gas emissions compared to combustion of either
8 coal or Russian gas since Jordan Cove's LNG would travel
9 thousands of miles less to its Asian customers than the
10 project that was studied.

11 Jordan Cove's LNG would provide even greater
12 reductions and worldwide greenhouse gas emissions than
13 estimated in that Department of Ecology student. Thank you
14 for the opportunity to comment.

15 MR. FRIEDMAN: Thank you for your comments. MS. LAUGHLIN:
16 Thank you. My name is Allison, A-l-l-i-s-o-n, Laughlin,
17 L-a-u-g-h-l-i-n, and I represent myself.

18 I've lived 42 years in Ashland, and I hike and
19 boat and fish and just love the area. And I stood on the
20 spot where the tunnel is going to go under Rogue River, and
21 I echo what somebody said. Why are we doing this? And I
22 thought about a 100-foot swath through this beautiful
23 country, and I thought why are we doing this?

24 I heard about eminent domain for two private
25 companies exporting mostly gas exported by Canadian

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1 companies. Why are we doing this? I do health and safety
2 inspections for schools and preschools over at the coast.
3 So much time and energy is being spent for the eminent event
4 of an earthquake or a Tsunami, and yet, we're going to put
5 that into that dangerous area. Why are we doing this?

6 We need to reduce carbon emissions. We need to
7 use less. We should not export our precious resources.

8 Fracking won't last. Someone said 20 years. I wonder if it
9 will even last that long. I urge you to stop. Thank you.

PM2-39

10 MR. FRIEDMAN: Susan Dougherty. Is Susan here?
11 All right, next is Sarah Westover.

12 MS. WESTOVER: Hi. My name is Sarah Westover.
13 It's S-a-r-a-h, W-e-s-t-o-v-e-r. And I'm here as one of
14 many people tonight who worked as part of the southern
15 Oregon coalition opposing the proposed ING pipeline.

16 I grew up in southern Oregon, and I continue to
17 live here because I love the sense of community that we
18 have here. And speaking of community, I just want to take a
19 second to recognize all of my peers who are here who've been
20 standing in the back of the room for up to two hours to
21 demonstrate to this Commission how much they oppose this
22 project.

23 And I also want to take a second to ask folks who
24 are here in opposition to the project to raise their hands.

25 (Show of hands.)

PM2-39 Comment noted.

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1 MS. WESTOVER: So, I also, in addition to the
2 wonderful community that we have here, I've chosen to stay
3 in Southern Oregon because I love the access that we have to
4 the beautiful forests, streams, and rivers. I'm also, I
5 will mention, pro labor and pro union. In fact, most of my
6 family works in southern Oregon in the construction field.
7 My mother is a metal fabricator, and she taught me how to
8 weld when I was 14 years old.

9 As someone who lives in this community, I'm
10 concerned about the pipeline's anticipated impact on the
11 well being of our environment, but I am just as concerned
12 about how that will impact the existing jobs of Oregonians
13 who currently rely on having healthy streams and waterways
14 to make a living. With the health of Oregon's forest and
15 waterways and our tourist-based economy on the line, I find
16 myself asking how is this project in any way good for
17 southern Oregonians.

18 The social and economic impacts of this project
19 seems to be pretty straightforward to me. Private energy
20 companies want to tear a trench through our state at the
21 expense of the safety and economic viability of Oregonians
22 so that they can maximize profits by shipping U.S. resources
23 overseas. And while corporate profits will soar, it's
24 workers and ratepayers who will be paying the price.

25 The Department of Energy has determined that

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1 exporting natural gas overseas will cause up to 1.2 million
2 manufacturing jobs to be lost to overseas factories. So,
3 not only will we be exporting our gas, but also our jobs. I
4 question the logic of exporting a finite natural resource
5 which would not only undermine U.S. energy independence, but
6 would also raise gas prices for Oregonian ratepayers by up
7 to 25 percent.

8 Oregon families are already struggling to keep up
9 with steady rate increases just to keep their homes warm in
10 these cold winter months. Many Oregonians are already put
11 into a position of having to choose whether they get heat or
12 whether they eat. The last thing Oregonians need is another
13 barrier to affordable utilities.

14 This project will disrupt southern Oregon
15 economy, offering only a handful of temporary jobs at the
16 expense of ratepayers, our public forests and waterways, and
17 the existing industries that grow around them. In my
18 opinion, that doesn't even come close to a fair trade, and
19 that's why I'm asking the FERC today to not only extend the
20 comment period on this project, but also to oppose the
21 project altogether. Thank you.

22 MR. FRIEDMAN: Jade, Morgan Lindsay, Maggie
23 Montgomery, Aaron Moffatt and Katie Parker. It's Jade's
24 turn to speak. Is Jade here? J-a-d-e? No Jade? The next
25 speaker will be Morgan Lindsey. Is Morgan here? And after

PM2-40

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PM2-40 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

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1 Morgan, Maggie Montgomery, Aaron Moffatt, Katie Parker, and
2 Rain Crowe. Please all come to the front.

3 MS. LINDSAY: Hello. My name is Morgan Lindsay.
4 You spell that M-o-r-g-a-n, L-i-n-d-s-a-y.

5 I'm a citizen of Jackson County, and I love
6 southern Oregon. I wasn't lucky enough to be born here, but
7 I found it, and I couldn't be happier than to live in the
8 wild, the Klamath/Siskiyou.

9 I stand here as an individual, and I want to echo
10 sentiments that have been said that every person in this
11 room deserves a job with dignity. We need more jobs in
12 Oregon, not less, but this pipeline is not the way to get
13 them.

14 I also stand here to represent the 3,000 members
15 of the Klamath/Siskiyou Wild Land Center, that's K/S Wild,
16 for short. The Klamath/Siskiyou bioregion of southern
17 Oregon and northern California is one of the most diverse in
18 the world. We have over 3,000 plant species, spruce, port
19 cedar wild wolves returning to southern Oregon for the first
20 time in 60 years. This is a special place. It's so special
21 that this is not the place for an export pipeline.

22 Most importantly, I would to politely demand
23 three requests of the Federal Energy Regulatory Commission.
24 First, I'd like to ask for an extension of the comment
25 period. Ninety days over the holidays is not enough time to

PM2-41

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PM2-41 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

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1 review 5,000 pages of documents. Please give us more time.
2 Second, I would like to thank Miriam Liberatore for being
3 here to represent the BLM and -- and I'm sorry, Wes, is it,
4 for being here representing the U.S. Forest Service. Thank
5 you so much for your public service.

6 K/S Wild is here to act as a link between the
7 public and our federal agencies. There are eight million
8 acres of public lands in southern Oregon, which belong to
9 all Americans, to every single person in this room. The
10 existing management plans those agencies do not allow this
11 pipeline to be built for good reason, a 95-foot clear-cut
12 across many streams this is not the way to steward our
13 public lands.

14 So, I am here on behalf of K/S Wild's 2,000
15 members and the thousands of old growth trees, mammals,
16 fish, insects, invertebrates, the birds, soil microbes and
17 to the entire tapestry of life that is threatened by this
18 type of building an export facility. So, please take hard
19 look at all the impacts of this pipeline. I respectfully
20 urge you to review those management plans that were
21 developed with many years of public comment and interaction
22 before amending them to allow private companies to benefit.
23 Thank you so much for the opportunity to speak. Again,
24 those were three demands, number one, extend the comment
25 period; number two, FERC, please study the impacts of

PM2-42

PM2-43

PM2 Continued, page 71 of 152

PM2-42 Comment noted.

PM2-43 See the response to IND1-3.

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1 fracking and climate change on our forests and rivers; and
2 third, Forest Service and BLM please be a good steward of
3 our public lands and take a hard look at those impacts.
4 Thank you very much.

5 MR. FRIZMAN: Maggie Montgomery. Is Maggie
6 here? Yes/no? Okay, next we go to Aaron Moffatt and then
7 Katie Parker, Chen Rain Crowe, and then Vanessa Sutton. Is
8 Erin here?

9 UNIDENTIFIED FEMALE AUDIENCE MEMBER: Yes.

10 MR. FRIZMAN: Aaron.

11 MR. MOFFATT: My name is Aaron Moffatt,
12 A-a-r-o-n, M-o-f-f-a-t-t. I'm very happy to see the diverse
13 turnout here. This is not a political issue, and I'm happy
14 to see both sides represented here.

15 This is not a jobs issue. It does not create
16 jobs. When an organization like this says jobs are to be
17 created, they're not considering the diverse or the negative
18 jobs, the jobs that are lost by a project like this. This
19 takes away from tourism. It does not improve the job
20 industry. Jobs can be created with renewable energy, and
21 that's what's ignored here in a project like this.

22 Secondly, this area, the area is bordered by this
23 pipeline are one of the last, one of the most valuable and
24 necessary to protect areas of our country and this world.
25 Major organizations, the World Wildlife Fund have recognized

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1 this as an extremely important region to protect within our
2 nation and within the entire world, one of just 200 left.
3 And this is one of the contiguous remaining areas
4 of untouched forest bordering these areas. It is essential
5 to protect these and to allow further logging for pipeline
6 creation is unsupportable. I cannot. I urge you to not
7 support this and to follow all the requests of other
8 speakers here. Thank you very much.

PM2-44

9 MR. FRIEDMAN: Thank you for your comment. Next
10 is Katie Parker.

11 MS. PARKER: I'm Katie Parker, K-a-t-i-e,
12 P-a-r-k-e-r. I've grown up in Ashland, and for the last
13 four years I've been working on the Rogue River in the Wild
14 Klamath section as a river guide, and I am concerned with
15 how this project will affect riparian areas in many of the
16 waterways in this area. Obviously, I love rivers and that
17 is a huge concern for me about how this pipeline will not
18 only affect these waterways as it's being constructed, but
19 also later on with the vegetation being removed.

20 And then, secondly, I'm concerned about how this
21 project will help to increase global warming, which is
22 already affecting my job. Without a snow pack we don't have
23 water late enough in the season for me to run my boats.
24 Thank you.

25 MR. FRIEDMAN: Thank you for your comment. If

PM2-44 Comment noted.

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1 some of the people standing in the back can come forward,
2 you might be able to find a chair. If all of you would come
3 down to the front, that would be wonderful.

4 MS. CROWE: Good evening. My name is Rain Crowe,
5 R-a-a-i-n, C-r-r-o-w-e. I'm grateful to be here at this public
6 hearing for comment. I did travel here from Portland where
7 I live part-time. I also live part-time in Josephine
8 County. I am representing myself, but also I'm a member of
9 the clergy for the Living World Congregation.

10 And I also wanted to say that there are many
11 people in northern Oregon, in Portland where I live, who
12 feel very strongly about this issue, feel very strongly
13 against the need for FERC to reject to this proposal for
14 this pipeline project and for the Jordan Cove terminal. We
15 do see that the resistance to the culturing exports that are
16 happening in the Columbia Gorge is a related issue. And
17 there are many of us who are here -- not here in this room,
18 but who feel very strongly about being in solidarity around
19 these environmental issues.

20 Many people have spoken incredibly eloquently
21 about all of the different parts of the DEIS, the
22 environmental impacts to the water, to the forest, to the
23 old growth forest, to the issue of eminent domain. Many
24 people have spoken about the need to look at the real
25 impacts of climate change in this time because we don't have

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1 much time as we think. We need to address it now. And I
2 thank all of the people who have spoken so eloquently about
3 that.

4 I also want to say that if you listen to some of
5 the words that are being spoken in this room tonight about
6 this plan; you hear the words Coquille, Modoc, Shasta,
7 Klamath. I would add the Klamath in that, and those are all
8 words that refer to first peoples of these lands. And I
9 just wanted to take a moment to say that as a person of
10 European descent, as a white settler in these lands, I think
11 it's really relevant to notice I wonder how many of those
12 folks are here, how many of the descendants of the ones who
13 didn't survive the Indian wars are here, and that there's a
14 connection around this. And I wanted to take a moment of
15 silence to honor the people who were killed in the Indian
16 wars and their descendants.

17 (Moment of silence.)

18 MS. CROWE: I also want to say that -- thank you
19 for that moment of silence.

20 I also want to say that more people in this room
21 have spoken to the way that the risks are going to be
22 publicized and the profits are going to be privatized, and I
23 have grave concern about that as well. I also want to say
24 that there are a lot of other voices not in the room, the
25 voices of the waters, the voices of the trees, the voices of

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1 the lands. And where I come from and the way that I
2 participate in these kinds of meetings and discussions we
3 take into account all the non-human voices and the
4 consequences to their lives and well being as well.

5 The last thing I want to say is I agree with the
6 request/demand for an extension of the public comment
7 period. And I would also like to request that there be
8 public hearings for commentary in northern Oregon and not
9 just in southern Oregon. I think you would be surprised to
10 see how many people would turn out in opposition. And I
11 want to ask that FERC please reject the proposal for this
12 project. Thank you.

13 MR. FRIEDMAN: Thank you for your comment.
14 Vanessa Friedman.

15 MS. FRIEDMAN: It's actually Vanessa Friedman,
16 that's V-a-n-e-s-s-a, F-r-i-e-d-m-a-n. And I thank you,
17 Rain, for signing me up. I was worried that there wouldn't
18 be enough support because last night was really depressing
19 for the first two hours, but I see that you all had me
20 covered, so I'm going to be really short. I sent you in
21 something longer.

22 I'm speaking for myself as a resident of Sunny
23 Valley in Josephine County, and I'm also speaking on behalf
24 of Oregon Women's Land Trust, Our Farm which is one of the
25 lands that would be affected by the pipeline.

PM2-45

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PM2-45 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

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1 I just wanted to say I don't think anyone has
2 mentioned this. I want to try not to repeat things people
3 said, and everyone has been speaking so eloquently. Last
4 night my friend Frances, who lives on our land, made the
5 point to say that Jordan Cove Company offered them a
6 one-time offer of \$2,292 to use 7 point acres of land. I
7 just want to make sure everybody heard that, \$2,292 one-time
8 offer for their trouble. And made it pretty clear that if
9 they didn't take that they were certain they would get
10 eminent domain and it did not matter. So, those are the
11 kinds of people who are in charge of supposed project and
12 that's what we're dealing with.

13 And for me, that was egregious for two reasons.
14 One, that's so offensive that you would think that that's a
15 reasonable offer to make anybody, and two, it shows really
16 missing the point because the land is priceless. There
17 isn't an amount of money that anybody at Oregon Women's Land
18 Trust wants for the land. We want to work together to make
19 sure that the land keeps existing for us because it's not
20 our right to make money off of it, and it's not our right to
21 be here. It is a symbiotic relationship and I think that's
22 been heard really loud and clear in this room.

23 So, I'm really excited to see so many people
24 here. Like I said, last night the first couple of hours
25 were pretty depressing. So, with that said, I do also

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1 really respect all the union workers and everybody who's
2 come out and spoke in support of wanting jobs and wanting to
3 work on this particular project. I understand the need for
4 wanting a job. I understand there not being enough jobs
5 here in southern Oregon, and I wish that the companies that
6 have the amounts of money like Jordan Cove Company were
7 interested in talking ways to create jobs that would help
8 continue to sustain the Earth and our livelihoods here as
9 opposed to pitting them against each other, which seems
10 really unfair because I do think that we should all be on
11 the same team. So, thank you.

12 MR. FRIEDMAN: Thank you for your comments. Next
13 on the speakers' list is Oceanah d'Amore, Vicky Simpson,
14 John Ward, Steven Fain, and Forrest English. If all of you
15 would come to the front of the room, that would be
16 wonderful. Also, I keep seeing some empty seats in the
17 front, so people standing in the back why don't you take a
18 look and see if you can find yourself a seat.

19 MS. D'AMORE: I love to hear people try and say
20 my name. My name is Oceanah d'Amore. And it's spelled
21 O-c-e-a-n-a-h, D- apostrophe -a-m-o-r-e. I'm from Talent,
22 Oregon. I've been a longtime resident here, and I want it
23 clear that I'm here to speak in opposition to this pipeline.

24 As other people have said, there've been so many
25 eloquent speakers addressing most of the issues, so I'm just

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1 going to reiterate some things that are important to me.
2 One is I request that extend the period for hearings for
3 this project, and another is that I believe that it is
4 FERC's job to evaluate the environmental impacts of the
5 project, and that to not consider the impacts on climate
6 change and the impacts of fracking is something that should
7 be taken into consideration.

PM2-46

8 I think it's pretty clear that there are negative
9 environmental impacts from this project, and I also believe
10 that it is FERC's responsibility to look at some
11 alternatives, for example, what if this project didn't take
12 place, or what if people invested in renewable energy?

PM2-47

PM2-48

13 The question of jobs and -- I think it's also
14 really important that -- you know, there's a few jobs that
15 come from this, but overall there's going to be an exodus of
16 our gas, our resources, and American jobs. And I think
17 public safety concerns are critical for the whole pipeline
18 and for the location in Coos Bay, and I'll leave it at that.
19 Thank you so much.

20 MR. FRIEDMAN: Thank you for your comment. Is
21 Vicky here? The next speaker is John Ward. Is John here?

22 MR. WARD: Yes.

23 MR. FRIEDMAN: Please come up, John. And after
24 John Ward is Steven Fain, Forrest English, and Jim Cooksey.

25 MR. WARD: Hi. For the record, J-o-h-n, W-a-r-d.

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PM2-46 Comment noted.

PM2-47 Comment noted.

PM2-48 Alternatives are considered in chapter 3. The scope of the Project does not include analyzing the effects of people investing in renewable energy.

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1 I'm here representing the 250 members of the Rogue Fly
2 Fishers and wanted to make clear that we're very concerned
3 about aspects of this project. The principal ones are water
4 quality, whether it's in fresh water or to some extent in
5 salt water. The impacts within the Coos Bay itself are
6 certainly a concern. I think they'll be addressed, but I'm
7 not sure that it's possible to mitigate them.

8 We're also very concerned about the eminent
9 domain interaction between that and the public need, if any,
10 for displacing people or impacting private ownership of
11 property rights.

12 I wonder if it's possible, Paul, for you to
13 accept I think a very sincere feeling that we're glad you're
14 holding these hearings. We're glad you're holding multiple
15 ones. But I wonder why it isn't possible for you tonight to
16 kind of clarify in what respects climate change and the
17 impacts of the gas production process itself are excluded
18 from looking at the environmental impacts of this overall
19 project?

20 MR. FRIEDMAN: I'll clarify it in two ways. One,
21 the discussion on climate change is in the DEIS. Please
22 read the DEIS where we discuss it. We disclose all
23 greenhouse gases generated by this project and we try to
24 assess their environmental impacts, so we do cover that.

25 The other thing is there is a section of the DEIS

PM2-49

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PM2-49 The purpose of this meeting is to provide the public a chance to comment on the proposal; it is not a question and answer session. Comments will be considered in determining what is needed to complete the FEIS.

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1 that discusses why the Commission chooses not to look at
2 fracking, and we will clarify that again in the FEIS.

3 MR. WARD: Thank you for that. We've also been
4 hearing about the public safety impacts in the immediate
5 Coos Bay area as well as the sedimentation on the
6 disturbances on the forest and lands. Thank you.

7 MR. FRIEDMAN: Thank you very much. The next
8 speaker is Steven Fain. Is Steven here, Steven Fain? And
9 after Steven is Forrest, Jim Cooksey, and Darin McCarthy.

10 MR. FAIN: Thank you. Steve Fain, F-as in
11 Frank-a-i-n.

12 Much has been said here about the role that this
13 proposed pipeline have potentially on climate change. I
14 just want to speak about its role as a barrier to wildlife
15 migration. With climate change, you can have habitat
16 change. Some plants and animals have the ability to move
17 and find habitat that's in agreement with them. A 95-foot
18 swath or clear-cut with a 3-foot pipeline laying in the
19 middle of might not seem like much of a barrier to some of
20 us, but it is a significant barrier to migration for other
21 animals and plants.

22 If they can move in response to climate change to
23 find some habitat that's suitable, they'll be less capable
24 of doing it now. Habitat fragmentation is a serious problem
25 for wildlife conservation everywhere. Certainly, here in

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1 Oregon this pipeline will only further fragment habitat
2 across the entire state.

3 At the other end of the pipeline, I wanted to say
4 that FERC should require that the EIS have measurable
5 criteria that would evaluate the degree to which the
6 pipeline is acting as a barrier, that the companies that own
7 the pipeline should be paying for biologists, either
8 non-government or government, to measure those qualities
9 that would tell you whether or not these criteria are being
10 met.

11 If there are impacts, negative impacts, if
12 wildlife migration is impeded, there should be some plan in
13 place to ameliorate that. And I'm hoping -- I have not read
14 the DEIS. I'm hoping that it's there.

15 On the other end of the pipeline there is the
16 matter of all of the ship traffic coming from a variety of
17 Pacific realm locations with different habitats, different
18 wildlife that will be -- some of which can make the transit
19 to the shores here in Oregon. The Coos watershed could be
20 inundated with exotic, potentially invasive species like
21 those that have been heard of and that are laying waste to
22 much of the Great Lakes through various similar
23 introductions.

24 Again, the FERC should require that there be
25 measurable criteria, that those criteria be monitored, and

PM2-50

PM2-51

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PM2-50 The right-of-way may act as a barrier to some species with limited mobility. See section 4.6.1.2. As the vegetation is reestablished within the 30-foot area and trees regrow in the rest of the area disturbed by construction, the right-of-way would not be a barrier to the movement of most species.

PM2-51 Criteria for aquatic invasive species are included; for example, water used for testing the pipe would be treated with chlorine.

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1 that the monitoring is being paid for by the companies
2 involved. Thank you very much.
3 MR. ENGLISH: My name is Forrest English,
4 F-o-r-r-e-s-t, English, just like the language. I'm program
5 director of Rogue River Keeper. And we're primarily here
6 concerned about water quality and salmon. In particular,
7 the idea that we can mitigate for the impacts of building
8 what's essentially a 95-foot wide road for 230 miles through
9 400 streams and rivers and other waterways is absurd. You
10 can't mitigate for that. That's a massive sediment dunk
11 into salmon-bearing streams that depend on those for
12 survival.
13 That's the exact thing that National Marine
14 Fishery Service said we need to stop the connection between
15 roads and streams, and it's a big road. That's a lot bigger
16 than most logging roads. Further, I mean we're talking
17 about clearing that 95-foot area along those streams of
18 riparian vegetation. We have huge temperature impacts here,
19 and salmon depend on cold water.
20 The idea that we can clear that riparian
21 vegetation, prevent shade from hitting the stream and that's
22 not going to warm the entire region is crazy. That's
23 something that's going to have a long-term impact on the
24 species that we're concerned about. Additionally, the
25 discharge of carbon dioxide and methane leaks from fracking

PM2-51
continued

PM2-52

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PM2-52 Comment noted. See section 4.6.2.3 for effects on streams.

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1 sites and from the burning of this gas, eventually, would
2 lead to exacerbating climate change and that climate change
3 would increase water temperatures throughout not only our
4 watershed, but around the world.

5 Again, this is a temperature issue. That's not
6 something you can mitigate for in the long haul. Now, where
7 are you going to find the cold water to replace that?

8 Furthermore, there's portions in the DEIS that discuss
9 naturally occurring mercury. Again, mercury is a potent
10 neurotoxin. That's not something that you can just put away
11 and mitigate somewhere else. I want to see how FERC intends
12 to avoid the discharge of mercury into our public waters.

13 And lastly, I was born and raised here. This is
14 my home. This is where I'm always going to be. And the
15 idea that we want to trash our state and trash our
16 particular region for the benefit of foreign corporations
17 and we're expected to bear the whole burden for that I think
18 is entirely unreasonable.

19 I expect FERC to deny this project. But before
20 you do that, give us another 30 days. You want us to read a
21 5,000-page document and have the public give you substantive
22 feedback, not what I'm giving you right now, but something
23 substantive and detailed in only 90 days through the
24 holidays. I think you would want more time, and I think
25 it's fair that we want more time. Thank you.

PM2-53

PM2-54

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PM2-53 As discussed in the Mine Hazards section (page 4-278 of section 4.2 of the DEIS), the alignment is not located in areas of mining or mine tailings that might be disturbed by construction of the pipeline. As discussed in section 4.4.4.2, construction activities along the revised pipeline route are not likely to encounter soils with elevated mercury concentrations. If sediments containing high levels of mercury are encountered in the East Fork Cow Creek drainage during Project construction, Pacific Connector would implement the measures outlined in its Contaminated Substances Discovery Plan.

PM2-54 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

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1 MR. FRIEDMAN: Next will be Jim Cooksey, after
2 Jim we have Darin McCarthy and then Surya Ince-Johannsen.

3 MR. COOKSEY: Yeah, Jim Cooksey, J-I-M,
4 C-o-o-k-s-e-y. I'm with the boilermakers. I represent the
5 boilermakers of the State of Oregon.

6 We understand the impact. We understand the "not
7 in my backyard" mentality of this project, and we fully
8 understand the environmental concerns of the community. But
9 on a bigger picture, boilermakers build the coal-fired
10 plants. We understand the ramifications of China, the
11 Pacific ream burning coal like they're doing at the rate
12 they're doing right now.

13 I mean the emissions that they're producing right
14 now are -- I mean there's no way that we can match that. If
15 they start changing to gas and cutting that by half that's
16 going to help a lot. But on top of the coal burning, the
17 carbon footprint that is being put out from the coal mining
18 in Powder River Basin in Montana, the train's coming. I
19 mean we've all seen the trains and they're not going --
20 they're not burning the coal here. They're burning it in
21 Asia. And if we can provide natural gas at a good rate for
22 them so they can use the natural gas to keep their industry
23 going, I think it's a good deal.

24 And I understand there's a lot of problems.
25 There's a lot of issues. I wholeheartedly -- you know, I

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1 have a lot of empathy for what the people that live here
2 what kind of problems you're facing with this, and we've
3 built a lot of projects all over the country, all over the
4 world, and we get through these problems.

5 Another thing that hasn't been mentioned here
6 tonight is these plants that are burning these 500,000 tons
7 of coal a week in China now not only are they emitting that
8 much carbon into the air, but then there's the ash problem.
9 And at some point in time, we're going to fill up our planet
10 here with all this ash and carbon. And we definitely need
11 to look at the overall health of our planet, not just this
12 immediate area here.

13 And as boiler-makers, we're involved in the
14 Blue/Green Alliance. We've done a lot of stuff with the
15 environment, and our business is clean air. And this right
16 now is probably one major step to helping the planet get
17 involved in the clean air issue, but right now there's a --
18 you know, right now a lot of our power plants in this
19 country are turned over to gas. So, our coal companies need
20 a place to sell coal, and Asia is where they're selling it
21 right now. And if these guys can get gas at a reasonable
22 price, maybe they'll quit buying so much coal over there.
23 Thank you.

24 MR. FRIEDMAN: Thank you for your comment. Next
25 is Darin McCarthy.

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1 MR. MCCARTHY: Hello. My name is Darren
2 McCarthy. It's D-a-r-r-i-n, M-c-C-a-r-t-h-y. I'm a retired
3 business manager of the Boilermakers Local 500 in Portland,
4 Oregon. And I'm one of these guys that do these temporary
5 jobs too. I've been in the trade for -- I was in the trade
6 for 36 years. I'd probably been in there longer, but due to
7 the fact there was a back injury I was forced to retire.
8 But that's how we raised our families is by these jobs.
9 And I'm sure there's other people out here that
10 have to raise their families too, but I want to talk a
11 little bit about reality too. Reality comes "" I mean how
12 many people here got a cell phone? Come on. Raise your
13 hands.

14 (Show of hands.)

15 MR. MCCARTHY: Imagine that. Well, you know,
16 we've been the ones when the Clean Air Act came in we're the
17 ones that put all the emissions, the boiler-makers did, on
18 these boilers and stuff. Believe it or not, we're the ones
19 that built them too. We're the ones that built these
20 natural gas plants, which there are about 10 of them right
21 here in this state, all pushing out over 500-megawatts at a
22 time.

23 But the thing is you look at price-wise, and when
24 it comes down to our use of electricity, folks, I mean right
25 here what I'm doing right now, what you plug your cell phone

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1 info, when you go in and you have a hot shower, or you turn
2 your furnace on believe me it has to come from somewhere.

3 And I'll tell you what, anybody seen the Columbia
4 Gorge lately and seen the wind turbines up there, that is
5 the most ugliest thing I've seen in my life, but I tell you
6 what, you know, if it could be wind then it would be wind.
7 I would go with it, but you know, it's just not sustainable.
8 If the wind don't blow, we don't get no electricity. If the
9 sun don't shine, we don't get no electricity.

10 But I tell you what each and every person in here
11 likes to turn their lights on when they go home. Each and
12 every person here are the ones that want to go and plug in
13 their cell phones to charge them, charge their batteries
14 right here. That's reality guys because it does take power,
15 one way or the other, whether we like or not. And you know,
16 what it does do is it does make jobs. It makes jobs for
17 these construction workers that have been out of work for a
18 long, long time.

19 Since 2008, when the market crashed and you
20 looked at the pension plans and everything of our locals and
21 everything else, we put in so much money because big
22 corporations they didn't save Lehman Brothers that had \$62
23 billion worth of our funds. So, you know, when it comes to
24 jobs, you know, I believe in fishing and I believe in
25 hunting because I am one of them, but I do believe that we

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1 got to face reality too. And I don't know no answer to it.
2 I mean if I could -- if somebody could come up with one
3 today that would be great.

4 MR. FRIEDMAN: It time to wrap up now.

5 MR. MCCARTHY: All right. Thank you very much.

6 MR. FRIEDMAN: Thank you. So, the speakers are
7 Sunya Ince-Johannsen, Emily Berlant, Dennis Frack, and
8 Elvira Sturdicoff. Please come up to the front.

9 Also, for people standing in the back, I believe
10 there's some seats in the front you can fill in.

11 MS. INCE-JOHANNSEN: Good evening. My name is
12 Sunya Ince-Johannsen, and it's spelled S-u-n-y-a, I-n-c-e
13 hyphen J-o-h-a-n-n-s-e-n.

14 First of all, I'd like to thank you all for the
15 opportunity to speak tonight, and ask for an extension for
16 the 90-day comment period. It's just not enough time to
17 address all of the issues in this 5,000-page DEIS.

PM2-55

18 The DEIS does not adequately address risks
19 regarding earthquake and Tsunami hazards, wildfire risks,
20 risks associated with fracking in the Rockies, and of
21 course, the big one is climate change. I'm sorry for all
22 the redundancy here this evening.

PM2-56

23 I've lived in this beautiful state my entire
24 life. And I know that Oregon stands for clean, renewable
25 energy, not LNG exports, which I might add are very bit as

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PM2-55 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

PM2-56 See the response to IND1-4.

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1 dirty as coal.
2 If this project goes through, it will quickly
3 become one of the top greenhouse gas emitters in Oregon. I
4 understand the need for jobs in rural Oregon, but this is
5 not the way to achieve this goal. Jobs in Oregon should be
6 in clean and renewable energy, healthy fisheries, tourism,
7 recreation, and all the other wonderful things that this
8 great state has to offer.

9 There's a reason why this project has been
10 rejected everywhere else along the West Coast. We do not
11 wish to be the community that lets this project go through
12 out of desperation for only 1,000 temporary jobs and less
13 than 100 permanent jobs. This is not in the best interest
14 of the public. Therefore, eminent domain is not appropriate
15 in this case. I might add, who decides what the public
16 interest is? I think we do, not FERC.

PM2-57

17 Lastly, mitigation is not an acceptable course of
18 action for environmental impacts such as increased
19 greenhouse gas emissions, risks associated with the 9.0
20 earthquake expected on the cascadia subduction zone in the
21 near future, the effects of fracking in the Rockies, the
22 increased risk of wildfires, the impacts of habitat loss on
23 our sensitive and endangered plant species and animals, or
24 the loss of our last old growth forests.

25 Since these affects are unavoidable in this

PM2-57 See the response to IND1-5.

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1 project, I ask that you do not allow this pipeline and
2 Jordan Cove terminal projects to go forward. Thank you for
3 your time, and thanks for everyone's great comments tonight.

4 MR. FRIEDMAN: Thank you for your comments. Next
5 is Emily Berlant. Is Emily here?

6 MS. BERLANT: My name is Emily Berlant,
7 E-m-i-l-y, B-e-r-l-a-n-t. I am a lifelong resident of
8 southern Oregon. I grew up in Grants Pass on the Rogue
9 River. I'm an avid rafter. I work here in the Rogue
10 Valley.

11 Throughout the course of this evening, I have had
12 my boss, various co-workers, friends, and other sorts of
13 associates that are all going to be negatively impacted if
14 this pipeline were to happen. My job would directly be
15 affected if there were to cross the waterway of the Rogue
16 River that would impact my livelihood and my income, coming
17 in from that river.

18 And as far as the natural gas bringing us
19 prosperity, as we learned with food, just because it says
20 "natural" in it doesn't make it a good idea. It doesn't
21 mean that it's clean. It doesn't mean that it's going to do
22 good things for us. It's really just not a good idea. Not
23 all things that come from the earth are good for us.
24 Sometimes they're poisonous, and this is definitely one of
25 those.

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1 And over the last decade or two, more jobs have
2 been coming in from clean energy industries. We are seeing
3 great job loss from these fossil fuel energy industries. If
4 we keep spooning away at the bottom of a sand castle,
5 eventually it's going to collapse, and that's practically
6 what we're doing with these elements that are within our
7 earth. We're not going to see them last forever, as the sun
8 is going to keep shining until it explodes, but we're going
9 to keep living until that happens.

10 And the wind's going to keep blowing, and we are
11 seeing affects of climate change where things are getting
12 windier and places are getting sunnier, so these renewable
13 energies that we can take advantage of are just going to
14 keep being more prosperous as we see the decline of our
15 reserves of fossil fuels.

16 And shipping this gas overseas really is not
17 going to bring any money here into southern Oregon. We're
18 going to see higher rates. And we are in an area where we
19 need lower rates. People are definitely choosing between
20 eating and heating because they can't pay their power bills.
21 They can't pay their gas bills. They can't pay their rent
22 because we keep seeing rates increase. And we have made
23 great strides over the last two years to remove dams on our
24 rivers here and those are definitely progressive movements
25 to restore our watersheds and to put basically another solid

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1 thing in our watershed is not progressive in any way, shape
2 or form.

3 So, I want to thank you guys for being here, and
4 everybody who has spoken, all my friends who are here, and
5 definitely request an extension on the comment period, and
6 hope that everybody listens to all of this with open ears
7 and open hearts. Thank you.

8 MR. FRIEDMAN: Thank you for your comments. Next
9 is Dennis. Is Dennis here? Elvira Sturdicoff. Elvira
10 here? Dan Gayland? Wes Brain. Wes, come on up. And after
11 Wes Brain, Keila Theiss. If all of you would come to the
12 front that would be great.

13 MR. BRAIN: Thank you for having me here. Wes
14 Brain, W-e-s, B-r-a-i-n. I'm a migrant here, moved to
15 southern Oregon in 1956. I love this area. We got a real
16 gem here, and I want to tell you some of my background.

17 I spent 16 years as a firefighter. In fact, we
18 responded on hazardous materials incidents. I do understand
19 the risks there. I also worked with Occupational Health and
20 Safety in the area. I did that for 15 years, and I do
21 understand the world of work, and health and safety quite a
22 bit.

23 I'm here to represent Southern Oregon Jobs with
24 Justice. That is my organization. We're in four counties
25 here in southern Oregon, that's Douglas, Josephine, Jackson,

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PM2-58 The FERC decided not to extend the 90-day period for comments
on the DEIS past February 13, 2015.

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1 and Klamath County. We work on issues of economic and
2 social justice. And I want to talk about the economy in
3 southern Oregon. We have not recovered. This is not
4 Portland. This is an area where we're hearing a lot about
5 jobs tonight, and we have not rebounded. We do not have the
6 jobs we need in southern Oregon.

7 There's a lot of people within unions who have
8 different points of view. The House of Labor is divided on
9 this issue. It really is. The short-term jobs are not the
10 way to go, okay, it is not. When we talk about taking our
11 economy here in southern Oregon, we're talking about an
12 economy that we're exploiting the workforce in a poor area
13 just like we're exploiting the environment here. This is
14 bad for workers and this is bad for our environment.

15 It's been mentioned -- you know, we're on the
16 edge of putting in an investment into a new kind of economy.
17 That's where we need to put our investment, right there. We
18 can change things. We can have jobs that will protect
19 southern Oregon, this beautiful environment that we have
20 here, put people back to work, good union jobs, and in fact,
21 that's the kind of boom we need. This is a boondoggle and
22 it's time that we put a stop to it right now. Thank you
23 very much.

PM2-59

24 MR. FRIEDMAN: Thank you for your comments.

25 MS. THEISS: My name is actually Keila Theiss.

PM2-59 Comment noted.

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1 It's spelled K-e-i-l-a, T-h-e-i-s-s. I've lived Sands
2 Valley for the last four years, but I grew up in southern
3 Louisiana where oil companies and corrupt politics rule
4 everything. I was in Louisiana when the BP oil spill
5 happened, and I know from first-hand experience that no
6 matter how many safety precautions are taken or how many
7 different EIS reports are written up the sad truth is that
8 no analyzer who sits at a desk all day is going to be able
9 to guarantee the safety of the people, water, land, and all
10 the wildlife that live in it.

11 If this pipeline comes through here, it's just a
12 matter of time before southern Oregon's land is just as
13 destroyed as the Gulf Coast states.

14 I did have a question specifically Miriam. Are
15 you guys -- and Wes, are you guys local? Do you guys live
16 around here?

17 MS. LIBERATORE: Yeah, I'm at the Medford
18 District, and I live around here.

19 MR. YAMAMOTO: I lived in Tiller, Oregon for over
20 30 years.

21 MS. THEISS: Okay, so your job is to preserve and
22 protect our land, correct? You can just nod if you like.

23 MR. YAMAMOTO: There's more to it.

24 MS. THEISS: Okay. My assumptions are public
25 lands belong to the public, and you were put in place to

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1 regulate those things. And by going through with this LNG
2 pipeline and amending all these different acts to allow them
3 to come through just seems like we're going backwards.

4 As much as I want to think, standing up here and
5 talking to you guys has an impact on what's going to happen
6 in the future, I honestly don't believe it because I know
7 this country is run by everyone that is not in this room,
8 everyone that has not spoken. We don't know who they are,
9 but they run this country, and things need to change.
10 They're changing slowly, but I don't think they'll change
11 fast enough.

12 As to jobs, and the labor unions who are here, I
13 don't really see anyone left any more, but why would you
14 risk the future generations of land just for a measly
15 paycheck? When I think about what I'm going to do with my
16 life, if it hurts or destroys anything, whether it be now or
17 in the future, I decide not to do it because I wouldn't be
18 able to live with myself if I destroyed the land just to be
19 able to pay for things. I'd rather starve. Thank you.

20 MR. FRIEDMAN: Thank you for your comment.
21 Michael (2:36:08:5). Michael? Okay, your turn.

22 MR. GLEICHMAN: Good evening. I'm Ted Gleichman,
23 G-1-e-1-c-h-man, representing Sierra Club, and will continue
24 to comment on DEIS deficiencies.

25 In Coos Bay, I detailed that we strongly support

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1 the good jobs goal, which is the only public good out of
2 this project; but those jobs must be in earthquake and
3 tsunami infrastructure preparedness and in clean, renewable
4 energy efficiency, conservation, and smart grid technology.
5 We have some information available here on that.

6 And I'm now going to mess up my three minutes
7 because -- carefully timed here because I feel an obligation
8 in this beautiful crowd of people from all perspectives to
9 disassociate Sierra Club, to some degree, from the comments
10 about temporary jobs. One of the building trade guys said
11 that they live on temporary jobs and that's absolutely true.
12 Eighteen month-projects, twenty-four month projects, those
13 are the ways that people feed their families for most of
14 what is done in construction and development in this
15 country. And there's a lot of evolution that can occur, we
16 are in a desperate situation economically. Jobs in southern
17 Oregon have not rebounded. There's still something like 7
18 percent below the 2008 level, and this is a real crisis if
19 you're not in the position to be able to feed your family.

20 We share, obviously, in Sierra Club all of the
21 concerns that have been expressed around water, forest,
22 climate, but we need to honor the needs of the people.

23 In Roseburg, I noted that FERC is violating its
24 own standards on cumulative impacts, failing to truly
25 reflect the natural boundaries of the project, including

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PM2-60 The assessment area for cumulative effects varies by resource, as explained in section 4.14.1. The Cumulative Effects section discusses climate change in 4.14.3.12.

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1 global, atmospheric climate disruption impact.

2 In Canyonville, I noted that this failure on
3 cumulative impacts also shows in the Commission's refusal to
4 recognize that this project will induce fracking, it's
5 failure to establish comprehensive, public procedures to
6 assess the project's financial viability by examining its
7 investors and its financial projects and protections for the
8 public, and it's refusal to consider a programmatic EIS on
9 all U.S. LNG financial energy impacts.

10 These choices, choices by FERC have short
11 circuited their consideration of whether the project is in
12 our best interest.

13 I said I would speak tonight on why gas is not a
14 climate solution, but I mostly don't need to because it's
15 been beautifully presented.

16 For the record, here are two publications that
17 several in this room made possible, and we have copies in
18 the back. I'll submit them. But the claims of the opposite
19 are not correct and not defensible. Numbers given were
20 distorted and are not valid. We can rebut them.

21 So, now I want to conclude by noting that FERC
22 now facing an existential crisis, and I have 24 seconds. I
23 hope somebody will give me an extra 10 minutes who hasn't
24 spoken yet. Choices by the Commission to narrow its scope
25 are now obsolete and dangerous. The fossil fuels industry

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PM2-61 See the response to IND1-3 in relation to fracking. The Commission considers financing in making its decision; see section 1.3. FERC considers each application individually; it does not decide applications on a nation-wide basis.

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1 can no longer be treated as a conventional and normal part
2 of the economy, and that is partially a choice by the
3 Commission.

4 2014 FERC priorities include integration of
5 renewables and smart grid standards. That's good, but the
6 crisis is clear, and it is not appropriate to pretend that
7 new fossil fuels infrastructure of any kind is acceptable as
8 business as usual. In virtually every situation where
9 energy evolution is required, renewables, efficiency, and
10 conservation can serve with new union jobs and the
11 Commission must now recognize that. Jobs that destroy
12 climate stability are not good jobs and that includes the
13 jobs of the Commissioners. Thank you.

14 MR. FRIEDMAN: Thank you for your comment. The
15 next speakers are Jason Kullig, Alex Sudd, Eliot Feenstra and
16 Carol Ampel.

17 MR. KULLIG: My name is Jason, K-U-L-I-G. I'm
18 former Navy. I've been a nuclear power plant operator, and
19 I used to work for Merck Pharmaceuticals. All those seemed
20 like great jobs. They were good-paying jobs, but look at
21 all the people that died from pharmaceuticals. We've all
22 heard of Bhopal. We've heard of Fukushima, Three Mile
23 Island, is that what we want in this area? Do we want to
24 put Coos Bay, Jordan Cove right up there with Bhopal?

25 We can work other places, but a lot of us don't

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1 want to live other places, and this is our backyard.

2 Thanks.

3 MR. FRIEDMAN: Thank you for your comment. Next
4 is Alex Budd.

5 MR. BUDD: A-l-e-x, B-u-d-d. I have just a few
6 kind of scattered thoughts to share.

7 First of all, thanks so much for coming and
8 sitting so patiently. If you need to get up and take a
9 stretch break, I won't take any offense. You know, take
10 care of yourselves.

11 First of all, I'd like to thank Paul for making
12 the commitment here to try and get another hearing
13 scheduled. I think it's clear that that's absolutely
14 necessary here, especially given how many people -- you
15 know, you've gone through the list and weren't here and
16 weren't able to speak. It's a long time to sit here for
17 five hours to wait for three minutes, and a lot of people
18 have families and kids and things they have to take care of.
19 So, thanks for respecting that.

20 I also want to say that, you know, while I'm
21 commenting I haven't read the entire DEIS, pretty close. I
22 think I need at least 91 days to get through the whole
23 thing. I was going to read it on Thanksgiving, but my mom
24 said that would be rude at dinner. So, I'd like to echo the
25 calls to extend the comment period by at least 30 days.

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PM2-62 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015.

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1 And you know, to be perfectly honest, don't take
2 this the wrong way, but I think FERC needs some more time to
3 think about this as well. It seems like there are a few
4 holes in the DEIS. Maybe it might be more like the Swiss
5 cheese of DEISs, more than a few holes, but a few things
6 that I'll touch on tonight. Someone used the word earlier
7 there'd been a comprehensive environmental analysis done
8 here, which I mean I didn't graduate from college or go to
9 college even, but I'm pretty sure I understand what the word
10 "comprehensive" means and the clear inadequacies in terms of
11 the findings in the DIS about the impacts of climate change
12 that's a major inadequacy that needs to be re-addressed.

13 If this project were to become one of the largest
14 sources of carbon pollution in the state isn't considered
15 seriously impactful, I'd love to know where that bar is set,
16 what would be considered a serious impact if not this?

17 Also, something that others have touched on, the
18 issue of fracking and where the gas is coming from. Unlike
19 many folks here, but like many others, I did not grow up
20 here in southern Oregon. I grew up in Colorado on the Front
21 Range where this gas is being fracked, where it's coming
22 from. And you know, I'm so glad that the boilermakers
23 expressed their concerns about coal pollution.

24 I don't think they are quite up-to-date on all
25 the science and what the reality is on the ground with where

PM2-63

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PM2-63 The EIS is complete and adequate to meet the requirements of
NEPA outlined in the CEQ implementing regulations at 40 CFR
1500-1508. Also, see the response to IND1-1.

PM2-64 See the response to IND6-1.

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1 this natural gas is extracted or where shale gas is
2 extracted really. And so, I think that's something else
3 that needs to be addressed, the true impacts of air. And
4 since this is happening on federal lands which belong to all
5 citizens of the country, you know, I know there are
6 thousands of people that I know back in Colorado that would
7 love the chance to comment on this process.

8 And actually, I'm going back in a couple of
9 weeks, and I'd be more than happy to set up a hearing there,
10 so let me know. Right now I live in Grants Pass, and you
11 know, the Rogue River supplies drinking water for many
12 residents in Grants Pass. It would also be nice to have a
13 hearing there since the pipeline crosses the river and could
14 impact our drinking water.

15 A few other quick things, I trust -- there was
16 talk about that if this project were to go through it would
17 require changes in the management plans, some of the
18 management plans for federal lands, and I trust that there
19 will be a full and comprehensive public input and review
20 process for any changes that would be made to those
21 management plans.

22 MR. FRIEDMAN: You need to wrap up.

23 MR. BUDD: Okay. Thanks for coming, and you
24 know, we've got some great apps if you'd like.

25 MR. FRIEDMAN: Thank you for your comments.

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PM2-65 See section 4.4.2.2 for a discussion of effects on drinking water. The pipeline would cross under the Rogue River using an HDD so it would not affect water quality. No additional comment meetings are planned for this Project.

PM2-66 The comment meetings currently being held for the Project are taking verbal public input on the proposed BLM and Forest Service plan amendments. The comment period for the DEIS is 90 days, rather than the typical 45 days, to give the public time to review the proposed amendments and provide written comments.

PM2-65

PM2-66

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1 MS. LIBERATORE: I just want to make an
2 administrative comment to address that. This is the public
3 process for commenting on the proposed amendments for the
4 Forest Service and BLM. There isn't another one, so you are
5 participating in it tonight, and your comment has been
6 entered into the record, but I just wanted to clear that up
7 that this is the process for commenting on those amendments.

8 I tried to make it clear, and if I didn't, I'm
9 going to make it clear right now.

10 AUDIENCE MEMBER: That's a little late.

11 MR. FRIEDMAN: Actually, I'm going to take
12 exception to that. Our Notice of Availability clearly
13 states that. All right. Also, our NOI clearly states that.

14 AUDIENCE MEMBER: What's an NOI?

15 MR. FRIEDMAN: Notice of Intent. So, Notice of
16 Availability, Notice of Intent clearly said that these
17 meetings were the process for the planned amendments.

18 All right, next person is Eliot Feemstra. Is
19 Eliot here?

20 MS. FEEMSTRA: Hi. I'm Eliot Feemstra,
21 E-l-i-o-t, F-e-e-m-s-t-r-a. I live in Tacoma now. I used
22 to live on Jump Off Joe Creek, which is a tributary of the
23 Rogue, and I'm a teacher.

24 And I was up in Northern Bridge Columbia earlier
25 this spring and learning about and listening to the folks

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1 talk about the pipeline that was proposed for up there,
2 which was a crude oil bitumen pipeline. And something I
3 heard from the Heltic people who I was working with and
4 interviewing while I was there is that we are the voice of
5 our lands and waters.

6 Anyone who'd like you can join me in saying that.
7 We are the voice of our lands and our waters, and
8 particularly, here these officials who have been given that
9 role you are also the voice of our lands and waters. And
10 so, I'm just one. I'm just one person and that's a lot of
11 voices.

12 But my question is here is if were to listen to
13 the voices of the Rogue River, of the 378 bodies of water
14 that the pipeline is going to pass through, of the old
15 growth forest, and the young forest and all those trees, and
16 the many species, which are endangered or affected, and then
17 all their kin who were there like if they had seats at this
18 table what would they say?

19 I think something like you are tearing into my
20 body. What you're proposing is to pump millions of gallons
21 of the water that is my blood. I have lived here and I have
22 survived here for many, many more years than you. I have
23 protected my children here. I have made this land rich for
24 you. I have given you everything that has made this room,
25 the seats you sit on, the tables you sit at, the papers

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1 we're passing out. This is your home because I made this,
2 and you are of me.

3 I invite you to enjoy the bounty that I've
4 created, the food that I've provided for you, the lives that
5 are made possible. And I ask you please don't rape and
6 pillage this place. This is my body.

7 As far as Eliot, some other things that I think
8 that this document lacks I think that it lacks any reference
9 to wonder or to awe. I don't think the document has taken
10 into account sufficient experiences or interviews with
11 children for their experience of the natural world. I
12 didn't see any description of taking a walk through an old
13 growth forest and what that feels like.

14 I'd like to see the comment period extended at
15 least through when there are sunny days again. I don't
16 think that this document takes into account sufficient
17 voices or experiences or expertise of the first people --

PM2-67

18 MR. FRIEDMAN: Eliot, you might want to wrap up
19 here.

20 MS. FEEMSTRA: I also ask that the BLM hold
21 another hearing because I don't think that it was clear, and
22 I would like to have more conversation with the tenders of
23 this land.

PM2-68

24 MR. FRIEDMAN: Thank you for your comments,
25 Eliot, and you know you can write some written comments as

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PM2-67 The FERC decided not to extend the 90-day period for comments on the DEIS past February 13, 2015. Consultations with Indian tribes are discussed in section 4.11 of the EIS.

PM2-68 The comment meetings that were held for the Project took verbal public input on the proposed BLM and Forest Service plan amendments; no additional meetings are planned. This was announced in the November 7, 2014 NOA for the DEIS.

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1 well in more detail. Thank you.
2 Is Carol here? Are you Carol? What?
3 MS AMPEL: I don't know if I'm the Carol you
4 want?
5 MR. FRIEDMAN: Are you Carol?
6 MS. AMPEL: Yes.
7 MR. FRIEDMAN: That'll work. That's you. And
8 after Carol is Naomi Johnson, Douglas Smith, Betty
9 McRoberts, and Dan Bailey. So, if all those people could
10 come up so they're ready to speak. And thank you, Carol,
11 for being in the front row and being ready to speak.
12 MS. AMPEL: And I respect your coming into the
13 lion's den. I know it must feel that way sometimes.
14 MR. FRIEDMAN: No, it does not.
15 MS. AMPEL: Anyway, my name is Carol Ampel,
16 A-m-p-e-l, and I have 66 years on this planet and almost all
17 of it has been spent right here in this area.
18 And on that basis alone I would say it's the
19 landscape of my heart, and I want this project stopped. But
20 everybody that's spoken before has nailed all kinds of
21 things that are concerns of mine. And the one thing I
22 would like to say is you need to just really double down on
23 the Tsunami issue. I live in Crescent City in 1964. There
24 was a tank farm south of town. It burned for three days
25 after that Tsunami hit. That town never recovered.

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PM2-69 The EIS discusses potential impacts from a future tsunami in section 4.2.

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1 I can't quite imagine what would happen to Coos
2 Bay if that Tsunami comes in and nails that gas plant or
3 that electrification plant, the one that's going to provide
4 the power. There's Tsunami sand miles up river from Coos
5 Bay from the one that hit in 1700. And the cascadia
6 subduction zone has quieted down, so the geologists have
7 kind of got their hair on fire about that. It could be
8 coming any time. Look at that. Look at that really, really
9 carefully. It's a huge issue, and it's not just the inline.
10 It'll be everything in between. They don't expect I-5 to be
11 viable after these earthquakes come through, and I don't
12 know how we're going to get emergency vehicles, if some are
13 needed, to stop things from going up in flames in that
14 pipeline. I don't know what would happen. And I think it
15 really needs to be addressed with squinty eyes. Thank you.

16 MR. FRIEDMAN: Thank you for your comments. Next
17 is Lilly. Is Lilly here? Douglas Smith. Is Douglas here?
18 Betty McRoberts. Is Betty here? And after Betty, Dan
19 Bailey, Jeff McGillivray, and Drew Waits.

20 MS. MROBERTS: Hi. I'm Betty McRoberts,
21 B-e-t-t-y, M-c-R-o-b-e-r-t-s. I live at 1011 Rustlar Peak
22 in Central Point, but I grew up on Gold Brick Road in Dora,
23 Oregon, Coos County, and I still have a family cabin there.
24 It's a lot next to a lot that is going to go through. And I
25 have a lot of friends and family that live in Dora still.