June 16, 2017

Governor Kate Brown
Office of the Governor
160 State Capitol
900 Court Street
Salem, OR 97301-4047

Re: Federal Energy Regulatory Commission Public Process Concerns

Dear Governor Brown:

The League of Women Voters of Rogue Valley (LWVRV) includes close to 100 members living in Jackson and Josephine Counties. We write to you today to ask for your help to ensure that the Federal Regulatory Commission (FERC) provides an equitable and inclusive public process with regard to the new application for the Pacific Connector Pipeline, a significant portion of which is proposed to run through Jackson County. FERC has scheduled “scoping hearings” for the Jordan Cove Pacific Connector Pipeline project as part of the NEPA process that precedes agency staff’s Environmental Impact Statement with a) inadequate three week notice of hearings, b) an inadequate (30-day) period for written comment, and of special concern to the LWVRV, c) no opportunity for personal testimony via a “scoping hearing” scheduled anywhere in Jackson County.

The League of Women Voters of Rogue Valley, as all local Leagues throughout the state, is a member of the League of Women Voters of Oregon (LWVOR) and of the national League of Women Voters (LWVUS). We share a vital commitment to open and public processes on all levels of government. The following position statements on Citizen Participation and Access can be found on the LWVOR website (www.lwvor.org/current-positions):

"The League of Women Voters believes democratic government depends upon the informed and active participation of its citizens and requires that governmental bodies protect the citizen's right to know by giving adequate notice of proposed actions, holding open meetings, and making public records accessible." LWVUS Principles

"We must promote an open governmental system that is representative, accountable and responsive." LWVUS Representative Government position
"Citizen participation and access are also important parts of LWVOR positions on Land Use and the Judicial System, and LWVUS positions on Campaign Finance, Citizens Right to Know/Citizen Participation, Environmental Protection and Pollution Control, Natural Resources Public Participation, United Nations, and International Relations Trade Policy."

Under three weeks of notice before a public hearing is inadequate, especially considering that materials about the project include hundreds of pages and, from what we understand, have not yet all been made fully available for review.

Thirty days to submit written comment on such a project is likewise inadequate. Ninety to 120 days is both more reasonable, has been the pattern with past iterations of this enormous project, and will certainly yield a higher quality of input.

Hearings must be held in all four counties that will be impacted by this project. Indeed, there exists strong opposition to the Pacific Connector Pipeline project in Jackson County. To fulfill its legal responsibility under NEPA, FERC needs to hear precisely the nature of that opposition. The agency should not be allowed to seek to avoid it by deliberately imposing restricted time and excessive travel burdens on residents who wish to participate in this phase of the process.

We therefore urge you to use the power of your office to ensure that FERC carries out a meaningful and sincere public process in all phases of this project, beginning now with our concerns related to “scoping hearings.” We urge you to support 1) later scoping hearings to ensure that the public has more time to respond to a full and complete set of documents, 2) an extension of the current 30-day comment period to 90 or 120 days, and 3) the inclusion of Jackson County residents by scheduling a scoping hearing in Medford.

We appreciate your consideration of this request and for all you are doing to address climate change in our beautiful state.

Sincerely,

Jackie Clary

Jackie Clary, President

Shirley Weathers, Ph.D., Climate Action Coordinator

Cc: Senator Ron Wyden
    Senator Jeff Merkley
    Congressman Greg Walden
    Colleen Roberts, Chair, Jackson County Commission
    Kimberly D. Bose, FERC
    Norman Turrill, President, LWVOR
    Chris Carson, President, LWVUS