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**June 29, 2017**

### **Scoping Issues for the Pacific Connector Gas Pipeline Project, Docket PF17-4-000**

The League of Women Voters is a grassroots nonpartisan, political organization that encourages informed and active participation in government. Since the 1950s, the League has been in the forefront of national efforts to protect air, land, and water resources. By now, we recognize climate change is the greatest environmental challenge of our generation. On the basis of these positions, the League of Women Voters Rogue Valley identifies the following as significant issues that must be thoroughly and effectively addressed in the Environmental Impact Statement (EIS) for Pacific Connector Pipeline (PCP) Project. Note that our recommendations call for study that addresses all direct, indirect, and cumulative impacts of the particular issue.

1. The EIS needs to include comprehensive analysis of actual terrain, geology, soils, weather, and other conditions along the pipeline route, including the interplay among these factors as they can be expected to affect the project. For example, the proposed pipeline will take a massive number of hours to build. The EIS needs to reflect a real life work schedule that takes into account equipment operations restrictions such as during migratory bird nesting season (April through August) and fire season (June through fall), as well as those caused by mud and rockslide hazards during the rainy season.
2. The EIS needs to provide an adequate evaluation and discussion of the “No action alternative.” In our judgment, the treatment of this NEPA requirement in the 2015 FEIS fell far short of compliance with the regulations.
3. The EIS should fully address potential safety and public health concerns, including at least,
  - a. Scrutiny of the safety record of the prospective pipeline construction contractor or at least the accident records of similar projects.
  - b. Experience of the pipeline designer and builder with geology, terrain, and soils similar to those to be encountered on this particular pipeline route.
  - c. Measures to discover gas leaks before they result in costly health risks and destructive wildfires.
4. The EIS must not sidestep the project’s enormous impact on climate change. NEPA, Sec. 101 clearly acknowledges that human activity has a “profound impact” on the natural environment. At (b) it says: “. . . it is the continuing responsibility of the Federal Government to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may-- 1. Fulfill the responsibilities of each generation as a trustee of the environment for succeeding generations . . . .”

We believe the Act calls for full investigation of all impacts of this pipeline on greenhouse gas emissions from the wellhead through transport.

5. FERC needs to take an honest and transparent approach to the question of whether an adequate future local and global market for natural gas exists. Now is the time to know that—not after the pipeline is built.

6. We in the Rogue River basin need clean, safe drinking water for our people. We need essential habitat for fish as we continue with the rest of Oregon our costly and decades-long struggle to bring back salmon. And we must preserve the economic and quality of life aspects of our waterways. This project threatens all of these. Where mitigation of harm is genuinely possible, effective and enforceable measures must be prescribed. We stress, though, that the EIS must fully disclose and acknowledge the inevitable issues where mitigation is not possible. Here are some important additional issues the EIS needs to cover more adequately than in 2015:

- a. Analysis of water quality limited and impaired waterways—such as the Rogue River itself—coupled with plans to *prevent* further impairment and degradation and commitment that where such plans cannot be devised, culprit actions will not be allowed.
- b. Analysis of the impacts of proposed use of pesticides and fertilizers on water and habitat.
- c. Full disclosure of impacts in the event of “frac-outs” in the process of horizontal directional drilling and minimal enforceable measures the Applicant must take to protect water users if a frac-out were to occur.
- d. Adequate detail in hydrostatic testing plans to allow genuine determination that impaired waterways will not be negatively affected.
- e. Where water rights would need to be obtained, the Oregon Water Resources Department will ultimately determine whether adequate water rights are available and appropriate, but the EIS needs to ensure that adequate rights are available and that proposed water use will not disadvantage Oregonians in any way.

We appreciate your consideration of this information.