

Oregon State Agency Comments
Jordan Cove Energy and Pacific Connector Gas Pipeline Project
Draft Environmental Impact Statement
(Docket # CP17-494-000 and CP17-495-000)
December 23, 2019

Introduction

The State of Oregon is currently reviewing the final Environmental Impact Statement (“final EIS” or “FEIS”) to ensure it provides a full and fair disclosure of the significant environmental impacts that may result from the siting and operation of the Jordan Cove LNG export terminal facility and the Pacific Connector Pipeline project (hereinafter collectively referred to as, the “Project”) as well as the comparative impacts resulting from a reasonable range of alternatives to the proposed action. See 40 C.F.R. § 1502.1; *see also* 40 C.F.R. § 1502.1 (“An environmental impact statement is more than a disclosure document. It shall be used by federal officials in conjunction with other relevant material to plan actions and make decisions.”).

The State provides these consolidated comments on the behalf of certain agencies that filed comments on the Draft Environmental Impact Statement (“DEIS”). Because the State’s review is ongoing, either these agencies, or other agencies who commented on the DEIS but are not included in these consolidated comments on the FEIS, may have additional comments at a later date.

If a State agency has determined that the FEIS adequately addresses a specific DEIS comment made by that agency, the agency will note that in the comments that follow. Otherwise, the State’s position is that its consolidated comments on the DEIS, dated July 3, 2019, were either not addressed or inadequately addressed in the FEIS. The State therefore reiterates its consolidated comments on the DEIS except as specifically noted below.

Oregon Department of Fish and Wildlife

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The Oregon Department of Fish and Wildlife (ODFW) submits the following comments on the FERC Final Environmental Impact Statement (FEIS) for the Jordan Cove Energy Project (JCEP) and the Pacific Connector Gas Pipeline (PCGP).

ODFW is statutorily charged with the management of the State of Oregon's fish and wildlife resources (ORS 496.012, ORS 506.109, ORS 509.140, and ORS 509.580 through 509.910). ODFW has an interest in federal actions affecting these resources.

Upon review of the FEIS and the various elements of the associated Comprehensive Mitigation Plan (September 2019). ODFW finds the proposed federal action insufficient in the following ways:

- Inconsistency with ODFW Fish and Wildlife Habitat Mitigation Policy (ORS 496.012 and ORS 506.109; OAR 635-415-0000 to -0025):
 - Proposed impacts to nesting habitats for marbled murrelet and northern spotted owls cannot be mitigated. The plans are inconsistent with the Category 1 mitigation standards of the policy.
 - Documents provide insufficient detail with regard to proposed mitigation actions. Since the project's inception, ODFW has recommended FERC and the federal land management agencies crosswalk the federal land compensatory mitigation plans with the standards in the ODFW mitigation policy to ultimately ensure that fish and wildlife impacts are avoided, minimized, and mitigated. As of the date of this letter, this crosswalk has not been included in the FEIS, and therefore ODFW does not have the information it needs to ensure the project's impacts will be offset to State of Oregon standards.
 - Where information has been provided, ODFW finds the proposed compensatory mitigation for impacts to estuarine environments, wetlands and waterbodies, and uplands does not fully meet the state's standards for offsetting the proposed pipeline's impacts to fish, wildlife, and their habitats.
- Incomplete or missing Fish Passage Plans (ORS 509.580 through 509.910; OAR 635-412-0005 through -0040).
 - At this time, ODFW has received Fish Passage Plans for the portion of the project located in the Coastal Zone Management Area (CZMA), however ODFW has requested additional information from the Applicant in order to finalize those approvals.
 - ODFW has not received fish passage design plans for the rest of the proposed pipeline and its associated infrastructure.
- In-Water Blasting Permit applications (ORS 509.140) have not been submitted to ODFW despite their mention in the FEIS.
- The FERC selection of the Blue Ridge Variation as its Preferred Alternative is inconsistent with the Biological Assessment, which analyzes the Applicant's preferred route. Furthermore, FERC has not obtained Section 7 Consultation from the US Fish and Wildlife Service or National Oceanographic and Atmospheric Administration's (NOAA) Endangered Species Act Section 7 Consultations for the Blue Ridge Variation.

ODFW stands by its original comments on the FERC Draft EIS, which provide greater detail supporting the points raised above. Please continue to refer to the *Oregon State Agency Comments on FERC's Draft Environmental Impact Statement for Docket Nos. CP-17-494-000 and CP17-495-000 dated July 3, 2019*.

ODFW also requests FERC give equal consideration to the comments and recommendations ODFW provided to the BLM on December 20, 2019 in *Oregon Department of Fish and Wildlife Protest of the Bureau of Land Management Proposed Resource Management Plan Amendments: Jordan Cove Natural Gas Liquefaction Terminal and Pacific Connector Gas Pipeline Plan (DOI-ORWA-M000-2017-0007-EIS)*.

Please be advised that ODFW intends to submit supplemental comments on this FEIS in the coming weeks. Should you have any questions or require additional information, I am your primary contact for this project and my contact information is provided above.

Oregon Department of Energy

Siting Division

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The FEIS addresses Oregon Department of Energy comments regarding State jurisdictional components of the LNG terminal by asserting that none are proposed. This is factually inaccurate. The applicant still proposes to construct a thermal energy production facility with the capacity to generate more than 25 MW. As proposed, the applicant would still utilize 3 STG's capable of producing 30 MW each. While the updated RR 13 and now FEIS assert that the applicant will purchase power from "the grid" reducing their need for on-site power production, this does not change the jurisdictional nature of the facility which is defined by its **generating capacity** (ORS 469.300(27)). Barring final engineering which describes how the facility will be incapable of generating more than 25 MW, or a fully executed agreement between the applicant and the State establishing that this is the case, Jordan Cove will still require approval from Oregon's Energy Facility Siting Council and will be responsible for meeting Oregon siting standards found in Oregon Revised Statute and Administrative Rules. In addition to other standards, these include Oregon's CO2 emissions standards, the provision of a legally enforceable retirement bond for the project, and a comprehensive discussion of, and preparation for, emergency situations that could endanger humans and the environment from construction and operation activities.

Emergency Preparedness

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The Oregon Department of Energy anticipates submitting comments on safety and security issues in the FEIS in the near future. In the interim, the Oregon Department of Energy reiterates the safety and security comments it provided on the DEIS.

Parks and Recreation Department, Oregon Department of, State Historic Preservation Office (Oregon SHPO)

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Section 4.11 addresses Cultural Resources in the FEIS. FERC outlines the steps in the Section 106 implementing regulations (36CFR800) of the NHPA as: “1) consultation, 2) identification of historic properties, 3) assessment of effects; and 4) the resolution of adverse effects.” Below, comments on the level of effort in terms of these steps are provided, in addition to communications in Appendix L.

Consultation with SHPO

Section 4.11.1 states: “Consultations for the current Project began with the issuance of the NOI on June 9, 2017”. As our office previously commented for the Draft Environmental Impact Statement (DEIS) the NOI is a scoping document. The Title of the June 9, 2017 NOI includes: “Request for Comments on Environmental Issues, and Notice of Public Scoping Sessions”. The document is not evidence of consultation under Section 106 of the National Historic Preservation Act (NHPA), and really should not be referenced as such in the Final Environmental Impact Statement (FEIS). As has been previously stated in our comments to the DEIS, the NOI stated: “The project-specific Area of Potential Effects (APE) will be defined in consultation with the SHPO as the Project develops.” Consultation with the SHPO on the APE is addressed in 36CFR800.4, where it states: “In consultation with the SHPO/THPO, the agency official shall determine and document the area of potential effects as defined in §800.16.” As of this writing, consultation on the APE has yet to occur. Our office responded to the NOI on June 27, 2017 stating that we looked forward to consulting with FERC on the APE.

If consultation began on June 9, 2017 with the issuance of the NOI as FERC states, it is confusing that correspondence between FERC and SHPO prior to that time, under different iterations of the project that are no longer applicable, are included as actual consultation. The five additional references to correspondence in Appendix L-1 prior to June 9, 2017, are all in reference to a 2011 Memorandum of Agreement (MOA) regarding a five-year review and termination. It is the responsibility of FERC to consult with SHPO, as well as other consulting parties on the current undertaking. Since the June 9, 2017 letter, we have received one other letter from FERC regarding the project. The remaining three listed in Appendix L-1 consist of letters from SHPO to FERC. Other letters discussed later are omitted.

As mentioned above, the June 21, 2017 letter to FERC from SHPO indicated that we looked forward to consulting on the APE, which has not yet happened. The October 18, 2017 letter from FERC to SHPO was an invitation to assist with development of the EIS, which is not consultation, nor is it the role of SHPO to produce such documents. The January 18, 2018 letter to FERC included our concurrence with eligibility determinations for a portion of the project received from the contract archaeologist. The

September 24, 2018 letter to FERC concurred with eligibility determinations for a portion of the project received from the contract archaeologist. Finally, the July 19, 2019 letter to FERC was written at the request of one of FERC's consulting parties, to inform FERC of a property that had been determined eligible through the state process, and further determined eligible by SHPO. Since June 2017, our office has submitted four letters to FERC (three in Table L-1), against one invitation to produce the EIS.

It is additionally unclear why Applicant Communications are included in Appendix L and Table L-2. For example, the December 14-22, 2017 email chain (listed as three entries in Table L-2) from Jordan Cove to SHPO is described as "Future investigations at the former mill site at the South Dunes portion of the terminal". Review of the email chain responses documents two concerns from the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians (CTCLUSI) over potential impacts to cultural resources. However, in that email chain, Jordan Cove states the initial email was part of their voluntary 30-day notifications of ground disturbance, that "is not part of the FERC 'undertaking' and Section 106 concurrence is not required".

Shortly after the December 14-22, 2017 email, the Advisory Council on Historic Preservation (ACHP) sent a letter on January 25, 2018 to FERC due to "expressions of concern from the CTCLUSI regarding geo-technical testing planned for portions of the project site for the Jordan Cove LNG project." In the letter, the ACHP requested "that FERC clarify for the Indian tribes, the proponent, and other consulting parties [which would include SHPO] the relationship of this testing to the undertaking subject to Section 106. We also ask that FERC show how it has considered the potential for effects to historic properties from the proposed testing." The January 25, 2018 letter from ACHP to FERC is not included in the FEIS Appendix L.

On August 8, 2018, Oregon SHPO sent a letter to FERC as a follow-up to the ACHP January 25, 2018 letter reiterating the request from ACHP. The August 8, 2018 letter from SHPO to FERC is not included in Appendix L or Table L-1. As of this writing, Oregon SHPO has not received a response to the August 8, 2018 letter.

For the remaining steps, while our office has concurred with some eligibility determinations, it was due to submissions by the contractor. Assessment of some effects and resolution of effects has also been through the contractor and the project proponent. Our office is unaware of any delegation of authority under 36CFR800 from FERC to the applicant. Other than the correspondences referenced above, consultation in terms of 36CFR800 from the lead federal agency has not addressed the APE, determinations of eligibility, findings of effect, or resolution of adverse effects.

Oregon Department of Land Conservation and Development

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- DLCD has determined that many concerns and recommendations were not addressed in the FEIS.
- Section 1.5.2.7 states “Applicants for certification of CZMA consistency are encouraged by the ODLCD to obtain state and local permits and other authorizations required by enforceable policies. The requirements of the CZMA are applicable to NPDES permits and must be included in the NPDES permit for the Jordan Cove industrial wastewater treatment facility.” This statement is not accurate. The following is a comprehensive list of state permits or authorizations that are required for this project and applicable to the coastal zone:
 - ODEQ: Air Contaminant Discharge Permit (JC)
 - ODEQ: CWA Section 401 Water Quality Cert (JC and PCGP)
 - ODEQ: 1200-C Construction Stormwater (JC Terminal)
 - ODEQ: 1200-C Construction Stormwater (Kentuck Slough)
 - ODEQ: 1200-C Construction Stormwater (US HWY 101/TPP)
 - ODEQ: NPDES General Permit 1200C (PCGP)
 - ODEQ: 1200-C Construction Stormwater (APCO)
 - ODEQ: Individual WPCF- Hydrostatic Testing (PCGP) in CZ
 - ODEQ: NPDES- Wastewater Treatment Plant
 - ODFW Fish Passage Plans Kentuck/APCO
 - ODFW Fish Passage Plan Access Road Steam Crossing in CZ
 - ODFW Fish Passage Plans Pipeline Stream Xings in CZ
 - DSL Removal-Fill Authorization (All)
 - DSL Proprietary Authorizations: Easements (JC)
 - DSL Proprietary Authorizations: Sand and Gravel Licenses JC
 - DSL Proprietary Authorizations: Waterway Use JC
 - DSL Proprietary Authorizations: Mitigation JC
 - DSL Proprietary Authorizations: State-owned land Xing’s PCGP
 - DSL Proprietary Authorizations: Special Use
 - OWRD: Limited License: Coos River
 - OWRD: Limited License: East Fork Coquille
 - OWRD: Limited License: Middle Fork Coquille

- OPRD/SHPO: State Archeological Permits(Various) JC Terminal
- OPRD/SHPO: State Archeological Permits (Various) PCGP in CZ
- OPRD/SHPO: State Archeological Permits(Various) JC Terminal
- OPRD/SHPO: State Archeological Permits (Various) PCGP in CZ
- ODOE Energy Facility Siting Certificate
- Given that the federal consistency review could result in state-imposed conditions to modify the project, the FERC must know the outcome of this review before issuing a decision. However, most importantly, if the FERC does issue a license provisioned on obtaining a concurrence from Oregon, it is a matter of federal regulation that the applicant does not begin construction prior to a federal consistency decision. Based on these requirements of the CZMA, DLCD requested that the recommended condition at section 4.7.1.2 be changed to reflect Condition #30 (Section 5.2, pg 5-19) and language altered to be consistent throughout the EIS. The FERC did not clarify that pursuant to CZMA § 307 (c)(3)(A), the FERC license is not effective until Oregon concurs with the applicant's consistency certification and that any conditions included with the concurrence will become conditions of the FERC license.

Table of narrative comments made by DLCD relating to the DEIS

Issue	DEIS Comment	Addressed in the FEIS
<p>Recommendation, rather than requirement for CZMA decision to be made prior to a potential FERC license to be effective. Oregon must concur with activity, any state conditions must also be included as conditions within the potential FERC license.</p>	<p>“Given that the federal consistency review could result in state-imposed conditions to modify the project, the FERC must know the outcome of this review before issuing a decision. However, most importantly, if the FERC does issue a license provisioned on obtaining a concurrence from Oregon, it is a matter of federal regulation that the applicant does not begin construction prior to a federal consistency decision. Based on these requirements of the CZMA, DLCD requests that the recommended condition at section 4.7.1.2 be changed to reflect Condition #30 (Section 5.2, pg 5-19) and language altered to be consistent throughout the EIS. The FERC should clarify that pursuant to CZMA § 307 (c)(3)(A), the FERC license is not effective until Oregon concurs with the applicant’s consistency certification and that any conditions included with the concurrence will become conditions of the FERC license.”</p>	<p>Not addressed in the FEIS – language outlines a recommendation that FERC avoid decision making until CZMA decision is made.</p>
<p>Necessary information and agreements made after the issuance of CZMA decision – leaving necessary state agencies without necessary information for review.</p>	<p>Sweeping mitigation and inventory recommendations that rely on the applicant providing the FERC information after issuance of the certificate order for the proposed project. That approach denies other permitting processes at the federal and state level, including federal consistency review, necessary information. Oregon created a networked coastal program, which means coastal partners and their state authorities are part of the federal consistency review currently under way. Relying on mitigation agreements after the certificate order, leaves partner state agencies without the information necessary to process permits and make decisions, including DLCD. A particular example is Recommendation #6 (pg. 5-13), which allows major alterations order issuance, aside from minor field adjustments. Such alterations would likely require permit modifications by various state agencies in the coastal zone and depending upon the significance of the change, implicate an additional federal consistency review per 15 CFR § 930.66. Similar challenges exist for Recommendation #33 for cultural resource inventories and</p>	<p>Not addressed in the FEIS</p>

	<p>associated plans and comments. Many of these 'post-order' conditions circumvent the state's opportunity to analyze impacts and provide the FERC comments on the extent of impacts and adequacy of mitigation for a broad array of issues in order to inform the final EIS.</p>	
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DLCD: Topics identified in Notice of Intent or in scoping period comments and remaining deficiencies in the DEIS with relationship to the CZMA federal consistency review process.

Issues	Source	Extent Analyzed in 2019 DEIS	Missing from 2019 DEIS	Relationship to CZMA Analysis	Addressed in the FEIS
Reliability and safety of LNG carrier traffic and natural gas pipeline	Commission Staff in NOI	<p>Section 4.10.1.1 Marine Traffic</p> <p>Section 4.13.1.3 Safety and Reliability focuses on collisions with LNG carriers.</p> <p>Conclusion Section 5.1.10: Increased marine traffic would be less than historic ship traffic and so no significant impact to other marine traffic.</p>	<p>--Safety of other commercial and recreation vessels, aside from collisions with LNG carriers (<i>i.e.</i> increased wait times to enter Coos Bay in changing weather conditions because of LNG carrier security zone)</p> <p>--Time of year 70 construction vessels or 120 LNG carriers will be present. If all year, how will vessels safely navigate winter weather conditions or location of anchorage if within Territorial Sea if not able to enter bay.</p> <p>--Locations where marine traffic can wait safely in bay while LNG carrier passes. See Figure 1 based on a carrier 50 yards wide.</p> <p>--No discussion regarding what maximum size carrier the bay can accommodate safely.</p>	Coastal effects evaluation for local coastal economies.	No
Impacts to aquatic resources from dredging access channel and slip and pipeline crossings	Commission Staff in NOI	Section 4.3 Water Resources and Wetlands	--Please see DEQ comments for detailed information for missing analysis regarding water quality.	Coastal effects evaluation for impacts to natural/cultural resources and related	No

		<p>Section 4.6 T&E Species</p> <p>Appendix H: Lists temporary and permanent impacts</p> <p>Conclusion Section 5.1.3.1; 5.1.3.2; 5.1.3.3: No significant impacts</p>	<p>--Please see ODFW comments for detailed information on missing analysis regarding:</p> <p>--Fish, wildlife, and associated habitats; e.g. the deepwater draft slip; salinity intrusion from dredging; impacts to aquatic organisms; and other aquatic concerns. Lack of assessment of riparian and steep slope impacts of the pipeline project.</p> <p>--Mitigation for temporary impacts to aquatic resources is a concern. Applicant and DEIS have specified mitigation actions for permanent impacts, however, the DEIS does not identify the temporary impacts fully for both JCEP and PCGP or propose mitigation. (<i>i.e.</i> impacted wetlands on pipeline route may take 4+ years to recover ecological function from pipeline impacts).</p> <p>--Mitigation for temporally related habitat function impacts.</p> <p>--Without specified mitigation that is tailored to address fish and wildlife habitats/ecology, it is not possible to balance impacts with offsets and come to a conclusion regarding total</p>	<p>local coastal economies.</p>	
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			environmental impacts for the project.		
Potential impacts on the LNG terminal resulting from an earthquake or tsunami	-Commission Staff in NOI -State of Oregon scoping period comments; DOGAMI comments August 15, 2017; pg 8	Section 4.1 Geological Resources Section 4.13 Reliability and Safety	-- Please see DOGAMI comments for detailed information regarding missing analyses including the following topics: -- Geologic hazards have not been comprehensively identified, addressed in the DEIS, nor mitigation proposed for impacts. -- Dependencies on existing infrastructure, such as roads and levees, which may fail during disasters causing public and environmental safety concerns have not been included. --Tsunami hazards analyses, including tsunami hazards with the proposed channel and estuarine modifications from related Port project, specifically how currents, debris and ballistics may negatively impact the surrounding areas and safety of people, have not been included. --An explanation of how the applicant will design, engineer, construct and operate the facility to integrate disaster resilience design	Coastal effects evaluation for impacts to local coastal economies and natural/cultural resources.	No

			<p>to ensure recovery of operations after major disasters.</p> <p>--An assessment of future climate conditions for the expected life span of the proposed facility and the potential impacts of those conditions on the proposed facility</p> <p>-- ASCE 7-16 (issued 2016) design standards include tsunami requirements, while the older versions do not. No discussion regarding new tsunami requirements or why most recent standards were not used.</p>		
<p>Impacts of pipeline construction on federally listed threatened and endangered species including northern spotted owl, marbled murrelet, and salmon</p>	<p>Commission Staff in NOI</p> <p>State of Oregon scoping period comments; ODFW comments August 15, 2017; pg 15-34</p>	<p>Section 4.6 lists impacts to federally listed species throughout. May affect and likely to adversely affect 12 species.</p> <p>Section 4.7 lists total late successional (old) forest acres on BLM land. 159.19 acres, BLM Coos Bay District,</p> <p>Section 2.1.7 Non-federal land</p>	<p>--Please see ODFW comments for detailed information regarding missing analyses.</p> <p>--The DEIS notes some mitigation (<i>i.e.</i> older stand management); however, without specific assessment of impacts in relation to mitigation it is difficult to balance effects and come to a conclusion regarding total environmental impacts for the project.</p>	<p>Coastal effects evaluation for impacts to natural/cultural resources and local coastal economies (salmon; recreational and commercial).</p>	<p>No</p>

		<p>mitigation still in development.</p> <p>Section 5.1.6 states no mitigation has been proposed by applicant to date.</p>			
Impacts of pipeline construction to private landowners including the use of eminent domain	Commission Staff in NOI	Section 2.3.2 Statement of ability for Project to use the right of eminent domain	--Entire analysis of impacts of exercising eminent domain on landowners, livelihoods, land-associated businesses, and property values.	Coastal effects evaluation for impacts to coastal economies.	No
Cumulative effects from additional large-scale projects in Coos Bay; particularly related Channel Modification project.	State of Oregon scoping period comments; ODFW comments August 15, 2017; pg 15	<p>Section 4.14: Statements acknowledge cumulative effects of the Port's Channel Modification throughout. Acknowledged project is likely to have the largest contribution to cumulative impacts on Coos Bay. (pg 4-794)</p> <p>Appendix N lists total acres whether upland or aquatic) from all regional projects.</p>	<p>--Please see ODFW comments for detailed information regarding missing analyses including:</p> <p>--Limited analysis of impacts and lack of quantification of mitigation to offset impacts including, but not limited to: cumulative cubic yards, cumulative duration of disturbance in the waterway, cumulative conversion of shallow to deep-water habitat, cumulative changes in water current, cumulative changes to natural and conservation estuary management units in Bay, cumulative mitigation for permanent aquatic habitat changes including oyster, clam, shrimp, crab and other aquatic ecosystem-dependent economies.</p>	Coastal effects evaluation for impacts to natural/cultural resources and economics.	No

			--Unable to locate Table 4.14.2.3-1 as reference in Section 5 (pg 5-11). Projects with largest estuarine impacts warrant deeper, quantifiable cumulative analysis.		
Impacts to non-listed species and upland habitats and associated mitigation for impacts.	State of Oregon scoping period comments; ODFW comments August 15, 2017; pg 28	Section 2.1.7 Non-federal land mitigation still in development. Section 4.6 briefly describes state listed species.	-- Please see ODFW comments for detailed information regarding missing analyses including the following: -- No analysis for state species of concern, habitats of concern, state protected wildlife, associated mitigation for species habitats via state's habitat mitigation policy.	Coastal effects evaluation for impacts to natural/cultural resources	No

Table 2. Additional deficiencies of the DEIS identified by DLCD.

Topic	Sections/Pages	Missing from 2019 DEIS	Relationship to CZMA Analysis	Addressed in the FEIS
Impacts of spatial restrictions of channel use to recreational and commercial fisheries. Please see Figure 1.	Section 4.8.1.1 JC Terminal Recreation and Visual Resources: Acknowledges impacts to crabbing/clamming, boating, and fishing because of LNG carrier security zone (pg 4-540-541) Section 4.9.1.7 Recreation/Tourism and 4.9.1.8 Commercial Fishing: Acknowledges impacts from LNG carrier security zone (4-596-598).	Analysis regarding economic impacts from LNG carrier security zone requirements (<i>i.e.</i> missing preferred fishing times, tides, or other critical natural resource timing issues due to 2-3.5 hour delay (page 2-14) while LNG carrier is in navigation channel). The time estimation in Section 4.8 (pg 4-541) conflicts with information on pg 2-14 and also on pg 4-598 (20-30 minutes). Bar pilots guiding commercial ships report passing approx. 6 recreational boats (pg 4-541) and 2 commercial fisheries boats (pg 4-597) per trip. The width of carrier plus security zone (likely 500 yard radius	Coastal effects evaluation for impacts to local coastal economies from safety considerations and associated delays	No

	<p>Sections 5.1.8.1 and 5.1.9 Conclusion: No significant impacts commercial or recreational fisheries vessels or economies.</p>	<p>around moving ship (pg 4-623)), is approximately ¼ of a mile (See Figure 1). No spatial analysis of security zone for LNG carrier including pinch points, safe waiting areas, vessel delays, and associated impacts to fisheries-dependent economies. The security requirements for LNG carriers are not similar to other deep-draft vessel use of the channel, warranting additional analysis.</p>		
<p>Impacts to regional resources and economy from global climate change due to additional atmospheric carbon inputs</p>	<p>Section 4.14: Cumulative Impacts Acknowledges broad impacts to nation from climate change. (pg 4-804-807).</p>	<p>Analysis does not include unique challenges to coastal region from: climate change and sea level rise, decreased income for natural resource-dependent economies, or increased wildfire. Analysis does not include alternative to require stricter emission mitigation, or mitigation to offset regional impacts.</p>	<p>Coastal effects evaluation for impacts to local coastal economies and natural resources.</p>	<p>No</p>
<p>Impacts to culturally-important resources in project area (Terminal and pipeline)</p>	<p>Section 4.11 Cultural Resources; Acknowledges the TCP nomination document as part of an impending ethnographic study (pg 4-637).</p> <p>Appendix L: Tables within list many sites in need of further survey and testing or that are currently unevaluated. L-13 mentions TCP and need to assess.</p>	<p>The DEIS does not include relevant information compiled in the traditional cultural property historic district nomination document or the impending ethnographic study from the applicant. Without the information, impacts cannot be assessed, or alternatives identified to avoid, minimize, or mitigate impacts to resources.</p>	<p>Coastal effects evaluation for impacts to cultural resources.</p>	<p>No</p>

