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By DOE/FE at 2:41 pm, May 04, 2018



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FE Docket No. 12-32-LNG

U.S. Department of Energy (FE-34)
Office of Regulation and International Engagement
Office of Fossil Energy, P.O. Box 44375
Washington D.C. 20026-4375
Dear D.O.E.:

Please accept these comments from Umpqua Watersheds, Inc. on the **Application to amend Authorization to Export Liquefied Natural Gas Produced From Domestic Natural Gas Resources to Non-Free Trade Agreement Countries for a 25 Year-Period**. Umpqua Watersheds, Inc. (UW) is a 501 c3 non-profit environmental conservation, restoration, education advocacy organization with offices in Roseburg, Oregon. As the volunteer Conservation Committee Chairperson, I am empowered to offer these remarks on behalf of the remainder of the Board of Directors, the active and concerned membership of UW and, in particular, on behalf of members who stand to be directly and adversely impacted by the unwanted imposition, onto their communities and properties, of the Pacific Connector Gas Pipeline. Umpqua Watersheds was granted intervenor status by FERC on 10/22/2017.

UW offers strong exception to this amendment, which our researches indicate to us will facilitate the export of foreign-sourced natural gas in the form of liquefied natural gas (LNG) to non-free trade agreement nations that are also our commercial competitors; at least one of which also poses a potential aggressive threat to the United States of America and several nations to whom the USA is under treaty obligations for mutual defense and well being.

UW strongly objects to an agency of its Federal Government, to wit DOE, permitting and thereby endorsing the export onto the world market of a commodity needed in North America for maintenance of current levels of prosperity. Such export would likely add unwanted volatility to natural gas markets, putting upward price pressure on the cost of natural gas, domestically, to the detriment of domestic consumers, residential, commercial and industrial, while simultaneously threatening existing LNG export entities. Likewise, we strongly suspect that this facility will exist, if permitted, largely for

the sole benefit of a Canadian export scheme, which cannot therefore benefit existing negative trade balances of the US with East Asian competitors. In the long term, it may very likely exercise a negative influences on domestic manufacturing and other employment sectors.

Over and above this significant, short term consideration, however, is the long term and growing threat of onrushing climate change, propelled, as scientific consensus tells us, by increasing discharges of green house gasses emanating from anthropocentric sources. As declared by Oregon Senator, Jeff Merkley, these gasses need to remain in the ground. To permit the construction of an LNG liquefaction plant and its 231 mile long supply pipeline, can only serve to encourage the extraction and burning of vast additional quantities of a fossil fuel, when alternative energy sources should, if citizen welfare be a prime concern of the Department of Energy and of government in general, as well it should be.

This is not to mention the deleterious additional environmental impacts of the PCGP on the numerous streams and several important anadromous fish bearing rivers and their tributaries; these draining many watersheds already badly degraded by poor forestry practices, whereby large swaths of forested hillsides are clear cut on a short rotation, financial forestry paradigm. Our beleaguered watersheds cannot well tolerate this additional ecological insult. Conserved and/or restored watershed function is existential to the well being of citizens and their communities. We ask the DOE to consider the value of the ecosystem services provided by intact and/or restored watersheds at the same time that it carefully considers the deleterious impacts of an unneeded, intrusive and unwanted construction.

The great majority of landowners along the PCGP route reject this intrusive proposal out of hand and will not willingly permit trespass and/or acquisition of their private property by a foreign commercial entity. Many have formally pledged never to concede any right of way for the pipeline or freely grant other access easements. That their own government would even consider, due to misconstrued and unjust legislation, permitting the condemnation and acquisition of their sacred property rights for the complete and sole benefit of this foreign for-profit scheme and its overseas customers is, on its face, outrageous.

For citizens on and adjacent to the PCGP and the liquefaction and related storage facility in North Bend, Oregon (i.e., all of the cities of Coos Bay, North Bend and environs), adding fear to anger, is the certainty of an 8.5 to 9.5 rupture of the Cascadia Fault, which would likely result, we are told by reliable authorities, in some three to five minutes of intense shaking followed, within the identified and expanding tsunami inundation zone, by waves whose height has been estimated to be between 25 and 100 feet, depending upon the geologic circumstances and timing of this event. A frightening and damning critique of this venture, issued on 11/06/2017, by the Oregon Department of Geology and Mineral Industries (DOGAMI), in strong and clear language, takes this entity to task for not having fully examined the geologic threat pervasive on this route and at the plant. In the simplest and frankest terms, there is no humanly credible way to make this structure proof against such an unimaginable stochastic event. Therefor, it is incumbent upon the DOE, as upon all government, local, state and federal, to fulfill its primary and most elemental function: to act in the best interests of the affected citizens; safety of life, limb and property being paramount among these best interests.

For the reasons stated above, Umpqua Watersheds, on behalf of its concerned and active membership, and with the best interests of all of the citizens and wildlife of this region in mind, insist that the DOE reject permitting or otherwise endorsing and enabling commencement of this project, out of hand. After all, the DOE owes its first allegiance to we citizens, to our safety and the integrity of our private

properties and commercial activities over and above the commercial, exploitative aims of a foreign concern.

Sincerely,

Joseph Patrick Quinn
Volunteer Conservation Chair,
Umpqua Watersheds, Inc.