

## Public Comment on the Jordan Cove Energy Project (CP17-494-000 and CP17-495-000)

Dear Members of the FERC Commission:

I strongly oppose the Jordan Cove Liquefied Natural Gas (LNG) and Pacific Connector Pipeline project (CP17-494-000 and CP17-495-000). FERC should not issue Authorization and Certificate of Public Convenience and Necessity because the adverse environmental, public safety, and other impacts of these projects demonstrate that the projects are contrary to the public interest. Additionally, the DEIS fails to support its conclusions that the projects would have only some limited adverse environmental impacts. FERC therefore cannot proceed without revising its analysis and any revised analysis must be made available for further public comment prior to any FERC decision to grant the pending application.

Specifically, I am concerned about the following impacts:

The Pacific Connector Gas Pipeline would impact 5.8 acres of my residential and working farm, which has been in my family since the mid 1940's. The property would be subject to eminent domain should FERC grant the requested certificate. The pipeline would result in a permanent right-of-way of 0.53 mi, or 2.3 acres, and a temporary extra work area of 3.5 acres. I am currently in the proposed route of the pipeline and adjacent to a proposed block valve.

I am opposed to the use of eminent domain by a private corporation for a private, non-utility project.

My family has put considerable financial and personal investment into the property over eight decades. I am concerned with the pipeline's impact on the farming operation, which is my livelihood. If the pipeline were approved, Pacific Connector should be required to fence the easement off from the rest of the field, as my cattle can't be allowed to walk through a muddy area. If I have to fence this myself, this would be costly and require significant extra effort as a result of issuing permits.

The pipeline route is proposed to bisect the property, likely reducing the value of the property. This property is my primary asset. I have stalled on installing new fence while waiting to learn whether it will be destroyed by pipeline construction. This has created issues already, as part of my fence-line has been improved and part has not.

The pipeline would result in a substantial long-term management impact due to restrictions on moving heavy equipment over the pipeline right of way. The presence of the pipeline will also result in additional burden given the need to inform and coordinate with contractors involved with work on the property regarding necessary operational and safety considerations and limitations related to the pipeline. This would bring me stress if I had to coordinate with the company in perpetuity.

### Water Impacts

Construction for the LNG terminal and pipeline would likely harm Oregon's water resources for irrigation and livestock watering, as well as other beneficial uses. On my property, the groundwater is so close to the surface that I do not need to irrigate my crops, though I do depend

on the current drainage patterns for the production of hay. I am concerned that construction of the pipeline will change the drainage of the property and either require piped irrigation or will cause flooding. When it rains hard, the water literally comes up from the ground at the site where the pipeline would be placed. The company maps show a recognized wetland on part of my property and on-the-ground data collection points (though I have not allowed survey access). I also use the water on my property for watering my cattle. If the pipeline is constructed, the water under it will flow along the path of least resistance, likely causing erosion into the hay fields, and possibly moving the pipeline. Before issuing a permit, I need FERC to ensure that the proposed construction does not interfere with groundwater drainage on my property.

The ground-fed spring forms a creek and flows along the property into the E Fork Coquille River. Construction has the potential to increase erosion on uphill sections of the property, and any erosion would wash into the crop fields. I do not see this creek on the company maps submitted with the application. The company also noted a spring on the maps I was given in the past that was removed on the most recent maps of the property that I've seen. However, the spring still exists.

This spring is in the spot where they're going to put the pipeline, just below the road. On the lower part of this swath, water emerges from the ground in the winter and spring. I predict that if the pipeline is built in this spot, this ground-fed spring water will no longer drain the way it currently does. If the drainage is redirected such that it follows the pipeline instead of the current drainage, this will create multiple problems: The first is that this water irrigates my hay fields, which I don't otherwise irrigate. If I had to irrigate, it would greatly increase my water consumption (and my water line might also be impacted by the project). The second issue that this could create is that water travelling along the pipeline may erode the support around the pipe and take sediment directly into the East Fork of the Coquille River, or cause the pipe to move. The third issue is that this water would not reach the creek as it currently does.

I see a potential for large increased of risk to public health and safety from this project, specifically with the proposal to use HDD under many significant waterways, including the Coquille River, because I remember the damages to the river and people's ability to irrigate and get their drinking water from the Coquille River when the 12" gas pipeline was built through Coos County a few years ago. Myrtle Point gets their drinking water from downstream of the E. Fork Coquille River HDD crossing proposed for my property. I am also concerned about how the soils removed from under the river during the HDD process will be disposed of on my property.

The pipeline would cross below (altitude) the intake of the drinking water on my property, but is proposed to cross the draw pipe between the intake and the house. The draw pipe is currently one continuous pipe laid 12-18" underground, which would mean that this pipe is segmented as a result of the construction. The company had previously included language in the easement contract that guaranteed rehabilitation of the gravity spring and delivery lines should they be damaged during construction, but that language has now been removed from the easement contract. I have not signed an easement contract. Given that the company at one time admitted potential negative impacts to my gravity spring and delivery lines, I expect that this damage is also possible at other locations along the pipeline. FERC should require Pacific Connector to include this adverse impact in their analysis.

### Steep Slopes

The pipeline is proposed on a very steep (est. 25% grade) slope on Lone Rock Timber's property, where I own water rights. It is inconceivable that the pipeline would be able to be buried on the contours of this slope. I am concerned about the damages of construction and the resulting risk of landslides. A large enough slide could damage my ground water and block the natural flow of the streams in the low section of the contours.

### Alternate Routes

I've spent fifteen years describing the locations and offering alternative routes to avoid the spring on the property. None of these routes (on my property or off the property) have been considered by Pacific Connector. FERC should require Pacific Connector to present alternatives that avoid my water and my neighbors' water as I've described multiple times to Land Agents.

### Blue Ridge Routes

In the DEIS, FERC has directed Pacific Connector to use a previously proposed route, which is now called Blue Ridge Variation. It is critically important that FERC requires Pacific Connector to provide updated construction alignment maps (including access roads, block valves, hydrostatic test break sites, metering stations) before the Final EIS is released. The public must be able to comment on these maps. Not allowing us to comment on the current route is a violation of our due process rights.

### Company Interactions

My interactions with Pacific Connector Land Agents have been a struggle.

One agent (Matthew Schoetz; Land Agent for Pembina from Universal Field Services) called me a week before Christmas 2018 asking if I'd reviewed an offer they had sent me by mail. The offer said that the property was worth \$1,400 an acre, but I had just paid taxes and the county valued my property at around \$3,000/acre.

Schoetz told me that if I sold my easement in that moment that he would move the above ground valve (Block Valve) off my property on to a neighbor's property. I felt that this was a threat, so I verified by asking, "Are you telling me that if I sign now you can make that go away, but if I don't sign now it stays?" And he said well yeah, basically yes. And my next word was, 'Well, this does not make me very happy.' And I said that I needed more time. I also informed him, as I have informed him every single time I have talked to him, that I am not willing to sign away my easement until there is a permit.

In the most recent offer, there were a number of problems. They had in wording on the offer that they would check the quality of the water, which I didn't need, because they are below where the intake is. I had made it clear, however, that if they crossed my drinking water supply pipe, that they replace the entire line instead of cut-and-reseal. Well, none of that language was in the contract, nor language protecting my ability to access my water line for maintenance. They took it out, they simply took it out. That language had existed in the previous offer, but for some reason, they took that completely out of the updated proposed contract.

A few months earlier, in October 2018, a helicopter flew over the property at around 300 feet, and I didn't think much about it. Two weeks later, it happened again and they were lower, and more reckless. I had cattle in my field at the time who spooked in reaction to the helicopter. I almost had a breakout and a stampede. If I had not been there, the helicopter would have caused a lot of damage on my ranch.

I knew they were flying below the legal limit because my brother is a helicopter mechanic and he works at airports, and we could tell that they were under 300' because there is a utility pole in the middle of my field for reference. We looked at the utility pole they were flying over and if you added two more utility poles on top that's about how high he was. I saw the markings on the helicopter: It was blue and white. My brother said they're not supposed to be that low over your property unless you've given them permission. I had not given them permission.

I called John Stevenson (Manager, Land; From Jordan Cove LLC, Pembina). I told Stevenson about the helicopter incident, and he told me that he would "take care of it," **and verified that it was a helicopter used to survey the route for Jordan Cove.** To his credit, I have not seen another helicopter over my property since.

The helicopter surveying could very likely have caused damage to my cattle and my fences, had I not been there to calm them down. I'm concerned that the maintenance surveys proposed by Pacific Connector include aerial surveillance, which means that this flyover that spooked my cattle is likely to happen again. If FERC approves this Certificate, my cattle and fences are at risk of being damaged during aerial surveillance, and this would create much more work for me.

I feel pressured by the company agents. I've made it expressly clear that I will not be selling an easement and that I would only deal with them in the case that FERC approves the use of eminent domain to force access on the property. Despite this very clear message, I have been continuously hounded by land agents.

For example, I've told the company that they need to provide 48 hours notice before visiting the property, but more than once, land agents have dropped by unannounced and said "We were just driving by and saw your car." This is a direct violation of my requests.

I also directed land agents (when Williams owned the project) to never use vehicles on the property, and one day when I wasn't home, surveyors drove through the middle of my hay field. I was also threatened years ago by a Williams employee who said that "things would get nasty" if I didn't sign my easement over to Pacific Connector.

I feel that because I'm a single woman living in a rural area I'm bullied, to put it shortly. I don't know what else to call their behavior when I've already made it so clear that I'm not willing to sell an easement. I've even seen Pembina's land agents refer to papers showing an estimate of my age and the ages of other elderly landowners, and can only assume it's because they hope that they can pick off the vulnerable people and make them sell the easement.

### Conclusion

Jordan Cove has failed to demonstrate that the project is consistent with state water laws, that the project is a practicable alternative with the least adverse impacts on water resources and safety.

The project will likely significantly degrade our rivers and streams, likely impact the value of my property, and the proposal provided will not adequately mitigate the adverse impacts. This project is not in the public interest.

I strongly oppose this project and the Federal Energy Regulatory Commission should deny with prejudice the Authorization and the Certificate of Public Convenience and Necessity.

Sincerely,  
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Document Content(s)

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