

Subject: 36 CFR 219.54(c) Objection Pacific Connector Pipeline Forest Plan Amendments for the Umpqua, Rogue River-Siskiyou, and Fremont-Winema National Forests

Jim Steitz
[REDACTED]

Received in Region 6

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January 15, 2020

Regional Forester's Office

Regional Forester/Reviewing Officer
Pacific Northwest Regional Office, US Forest Service
Attn: 1570 Objections
P.O. Box 3623
Portland, OR 97208-3623

Dear Forest Service:

In accordance with 36 C.F.R. Part 219, I, Jim Steitz, hereby object to the project described below.

DOCUMENT TITLE: Opportunity to Object, Plan Amendments for Pacific Connector Gas Pipeline on The Umpqua, Rogue River-Siskiyou, and Fremont-Winema National Forests.

PROJECT DESCRIPTION: The proposed action will make provision for 30.6 miles of the Pacific Connector Pipeline route to cross National Forest System (NFS) lands administered by the above-mentioned Forests. These areas affected by this decision include approximately 591 acres of lands associated with the proposed construction of the Pacific Connector Pipeline Project and approximately 186 acres associated with the proposed permanent right of way for the Pipeline Project, which would cross approximately 10.8 miles on the Umpqua National Forest in Douglas County, 13.7 miles on the Rogue River Siskiyou National Forest in Jackson County, and 6 miles on the Fremont-Winema National Forest in Klamath County.

PROJECT LOCATION: Umpqua, Rogue River-Siskiyou, and Fremont-Winema National Forests/Douglas, Jackson, and Klamath Counties, Oregon.

NAME AND TITLE OF RESPONSIBLE OFFICIAL: Alice B. Carlton, Forest Supervisor and Responsible Official, Umpqua National Forest.

OBJECTOR: Jim Steitz/[REDACTED]
[REDACTED]

TIMELINESS: This objection is timely filed. Notice of the Opportunity to Object to Plan Amendments for Pacific Connector Gas Pipeline proposed decision was published in the federal register on November 22, 2019. Sixty days from November 22 is January 20, 2020.

STATEMENT OF ISSUES:

The "Pacific Connector" pipeline and its associated LNG export project is contrary to the public interest, and responsive to no demonstrated need in the state of Oregon or in the United States that would offset the ecological and social damage it would inflict. The Forest Service proposal to arbitrarily amend its Forest Plans, to effectively carve a swath of the Umpqua, Rogue River-Siskiyou, and Fremont-Winema National Forests out of existence and out of the public domain, is therefore also contrary to the public interest and cannot legally or morally be approved.

The current Land Use Management Plan states clearly that any actions in Late-Successional Reserves must have either a neutral or beneficial effect toward the overarching goal of 'creation and maintenance of late-successional habitat.' There is no possible line of logic by which this pipeline is compatible with this criterion, nor any rational basis for deleting this criterion to exempt the pipeline from it. The Forest Service established this goal in its forest plans upon the premise that future developments might be proposed that conflict with it, and ought to be rejected. If a forest plan can be amended any time a gas pipeline developer requests, then there exists no forest plan in the sense of a prospective, binding document that codifies management goals.

Any rational cost-benefit consideration must find that the small tax revenues, small employment, and profits to the pipeline operator and user companies, which constitute the sum total of its benefits, would fail to offset, by even a fraction, the loss of our state's precious lands and waters. The "Jordan Cove/Pacific Connector" LNG terminal and pipeline are no benefit except for the revenues from the sale of the gas, of which only a fraction would remain with Oregon employees, residents, or governments rather than the Canadian gas company. Of vastly greater consequence is the shattering of Oregon's countryside matrix of farmlands, forest, and streams over 230 miles by the pipeline. These financial rewards are petty and inconsequential compared to the devastation of Coos Bay and the landscapes of Southwest Oregon, for which our descendants will never forgive the Forest Service.

If erroneously allowed to proceed, the "Jordan Cove/Pacific Connector" LNG terminal and associated pipeline would destroy vast areas of estuary, forest, and farmland that now stand in its proposed 230 linear miles of biologically demolished corridor, from Coos Bay to California. The pipeline applicant proposes to dump 5.7 million cubic yards of fill into 400 waterways throughout southwest Oregon, negating the hard-fought progress of Oregon's agencies and citizens toward salmon and river restoration. The pipeline would significantly increase temperature and sedimentation on many streams, and cause watershed-level degradation of the Coos, Umpqua and Rogue Rivers. Many of these impacts would likely further degrade streams that are already listed as impaired under the Clean Water Act.

In addition, the terminal would devastate Coos Bay itself, through initial construction as well as ongoing dredging. This destruction of tidal and coastal ecosystems would be painfully ironic, in light of the state's recent emphasis on safeguarding our coast through marine reserves and other policies. The terminal is a necessary and connected element to the pipeline, and its destruction of Coos Bay is an included impact of this Forest Service proposal.

The LNG port and pipeline would also help to sabotage America's dire existential need to stabilize the carbon content of the atmosphere. The Forest Service is bound by the findings of the interagency 'National Climate Assessment' regardless of the obfuscation and attempted burial of that assessment by the White House. The Forest Service is not allowed to adopt a fictional premise that anthropogenic climate change is not underway, man-made, profoundly deleterious to human life, and to be accelerated by the LNG export project of which these Plan Amendments are a part. The State of Oregon has correctly acknowledged the scientific realities of climate change that must bind its decisions, and has appropriately denied several State Land Board and Clean Water Act permits. The Forest Service must not countermand this judgment by substituting its own fantasy about the compatibility of expanded LNG export with a stable climate.

The Forest Service is obligated to consider the full scope and impacts of this project upon the public interest, when considering a request to use National Forest lands that are necessary to that project. You may not confine your decision-making to a 'site-specific' analysis of only immediate, proximate impacts within the National Forest. If the 'purpose and need' of the Plan Amendments is to meet a request from a pipeline company, then the ultimate object to which the pipeline company aspires is part of the Forest Service decision, including the consequent and mathematically inevitable acceleration of climate disasters. No amount of obfuscatory gibberish and falsehood from the White House denying the 'Social Cost of Carbon' as a measurement tool, or asserting an implausibility of linking climate impacts to particular fossil fuel projects, can override the mathematical reality that the 'Jordan Cove Pipeline' and LNG project will shift the world's entire probability distribution of harmful climate events.

SUGGESTED REMEDIES THAT WOULD RESOLVE THE OBJECTION

I, Jim Steitz, respectfully request that the Forest Service withdraw the proposed Plan Amendments as grossly inconsistent with the public interest, with American national security, and with the Forest Service governing laws. As a former resident of Oregon who retains great affection and interest in my home state, I object to its needless and wanton destruction, and its abject betrayal by a federal agency ostensibly chartered to serve the public interest.

HOW THE OBJECTION RELATES TO PRIOR COMMENTS

I have previously asserted these specific errors in the Forest Service's consideration of forfeiting our National Forests for a gas pipeline, in the public comment period for the same. The Forest Service has chosen to persist in its erroneous proposal, requiring that the errors be raised in an administrative Objection. The Forest Service response to these comments has disregarded its existing legal commitments, such as the Northwest Forest Plan aquatic conservation strategy and 'Survey and Manage' programs, has illegally shrunk its scope of analysis to avoid the climate implications of LNG export, and considered no alternatives, much less a rational justification, for why the marginal economic benefits exceed the loss of precious biological resources.

Sincerely,



Jim Steitz

