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Objection to Forest Plan Amendments for the Pacific Connector Gas Pipeline #28132

Many contextual, quantitative and qualitative aspects are objectionable, and I wish to register them as my objections for US Forest Service review. Policy issues are at the core of this filing.

Economic Context

The previous FERC decision was to reject the permit for this energy project since there were no customer contractual arrangements to receive LNG exports if the project were approved. Today the market for the same product is more unstable and less predictable as assessed by economic sector analysts. Please see Attachment File 1, Current LNG Sector Analysis.

Quantitative Factors

Risks borne by Oregon citizens stemming from methane (CH4) and Oregon's natural resources are not indemnified by the foreign investor. Uncontained methane losses to the environment, a dangerous and potent greenhouse gas regulated by the EPA, are described in the first paragraph of the Project Docket, Docket CP17-495-000. The Jordan Cove Energy Project is fed by the Pacific Connector pressurized gas pipeline. It says that the pipeline delivers 1.2 billion cubic feet per day, and the Jordan Cove installation exports 1.04 billion cubic feet per day. The gigantic compressors needed to turn the methane gas into methane liquid leak methane in huge quantities. An estimate from the actual numbers given in the subject FERC Notice is 1.20B - 1.04B = 0.16 billion cubic feet per day = 160 million cubic feet per day of unaccounted, lost methane. This is a threat on an extinction scale, forcing the planet past the survivable 1.5 deg C limit because the design life of the foreign-financed facility is 30-40 years. Oregon takes the climate and environmental hit, foreign interests speculate positive cash flow in the out years, as global damage multiplies.

Qualitative Factors

The Project EIS calls for the Forest Service to change its land use plans to allow for clear cutting along the pipeline right-of-way. These changes not only undermine federal environmental protections but if adopted, would also impact future management of these public lands, including predictably adverse herbicidal aerial spraying in the watershed including stream and river crossings.

This is a new role for the Forest Service:

Serving investors who are apparently incapable of writing their own EIS, then altering legacy rules to accommodate the Government authored EIS, motivated by speculative economic forecasts while maximizing biological impacts to National assets under the care of the Forest Service.

A role anyone who ever spent a day or an hour in a forest would find existentially objectionable.