
I am writing on behalf of 24 individual affected landowners who reside between mile post 11.13R and 21.6. All of these affected landowners are individual interveners in the current FERC Permit Application Process for the proposed Williams Pacific Connector Pipeline.

The following comments are directed at “Proposal #2 – Applicable Criteria for the Alternate Segment Alignments”.

OVERVIEW

We feel that both the original and certain specific parcel #’s in the amended portions of the route do not meet the County’s land use requirements and thus should not be approved. Please consider the following.

1. The new affected parcels North of Coos River – 25S12W20 – Parcel #’s 300, 100 and 400 we agree with. We have long proposed that the route move East to a Coos River crossing East of the Chandler Bridge. This new crossing point positions the pipeline perfectly for access to Blue Ridge and the alternate Blue Ridge 2013 Route between mile post 11.13R and mile post 21.6.

2. The new affected parcels on the South side of Coos River - 25S12W29 –
   a. Parcel #’s 1800, 2000, 1500, 1900, 1700, 200, 100 and 600 all cross historic tide land along the new alignment. This violates existing County, State and Federal land use for these lands and it causes the loss of over 2 lineal miles of this tide land without any mitigation by Williams.

   Note: The land use regulations related to farm land on historic tide land are very specific and the construction of a pipeline through these lands clearly violates existing land use regulations.

FURTHER
These proposed “revisions” (changes) to the alignment further increase the environment hazards and risk to even more native Coho habitat. The individual interveners involved in Blue Ridge LNG and various environmental groups are positioned to resist these alignment changes through the FERC Process and via the legal system.
The current 2013 proposed route from mile post 11.13R and mile post 21.6 is sure to be a battleground for years to come and improper land use will be one of the many arguments that will sooner or later compel Williams to take the 2013 Blue Ridge Route from mile post 11.13R to mile post 21.6 as opposed to the current proposed alignment.

b. The proposed revised alignment on 26S12W05 – Lot #1100 and parcel 26S12W08 – Lot #800 again violate land use regulations by again leaving a ridge top alignment and again increasing the proposed routes reliance on historic tide land and critical (Coho) habitat. All of the same issues as previously stated apply to these revised alignments.

Note: The Williams Pacific Connector Route from mile post 11.13R to 21.6 has always been faulted in its proposed land use through the rural residential neighborhoods of lower Coos River, Catching Slough, Stock Slough, Old Wagon Road, Coos City Sumner Road and Boone Creek. The proposed route violates County land use rules and regulations while at the same time exposing hundreds of homes to the inherent risk of the pipeline.

The County has an obligation to the citizens of these rural residential neighborhoods to enforce the land use rules and regulations as written. The County can do so by requiring Williams (as a condition of approval) to align its route between mile post 11.13R and 21.6 to the alternate 2013 Blue Ridge Route. The 2013 Blue Ridge Route is part of the current Williams Pacific Connector permit application before FERC. It resolves many of the land use issues that occur in this section of the proposed route and it is well within the County’s scope to make this requirement as one of its conditions of approval.

Special Note: With the suggested alignment changes Williams is now proposing they intend to cross 66 different water bodies from mile 11.13R to mile post 21.6. Each of these water bodies and the associated violation of County and State land use form a proposed route that is sure to fail. We ask that Coos County’s conditions of approval include the requirement that Williams move the route to the 2013 alternate Blue Ridge Route between mile post 11.13R and mile post 21.6.
CONCLUSION

The County land use question is now (as it has always been) out of order relative to the application process. As the County is well aware, Williams Pacific Connector does not have the permission of the landowners for the new affected parcels nor does it have permission from the landowners of the other existing parcels on the filed route, which Section 5.2.200 clearly requires. The requirement to get permission from the landowners has not been met and again the County should make landowners permission one of the conditions of approval.

The Proposed amended route changes South of Coos River place greater burden and risk on individual home and landowners who have not given their permission for access or right of way.

The proposed amended route changes have further placed the proposed route between mile post 11.13R and mile post 21.6 in an even more intensive riparian area, the new proposed alignment crosses approximately 2 lineal miles of historic tide land, all of which will be lost and none of which has been mitigated.

Perhaps the most obvious question the County should ask itself is, would the County find that a 36” pressurized LNG pipeline built by individual landowners on the same land as proposed be acceptable to County (and State) land use rules and regulations?

As affected landowners and home owners we are asking the County to protect our land use rules and regulations and to require Williams Pacific Connector to take the alternate 2013 Blue Ridge Route between mile post 11.13R and mile post 21.6 by making it a condition of approval.

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