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## State of Washington Citizens Committee On Pipeline Safety

PO Box 47250 Olympia, WA 98504-7250 • [www.wutc.wa.gov/pipeline/ccops](http://www.wutc.wa.gov/pipeline/ccops)

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December 15, 2007

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E., Room 1A  
Washington, D.C., 20426

Re: Draft Environmental Impact Statement (DEIS) for the Bradwood Landing LNG Project (Docket Nos. CP06-365-000, *et al.*)

Dear Secretary Bose:

The Washington State Citizen Committee on Pipeline Safety would like to submit the following comments on the Draft Environmental Impact Statement (DEIS) for the pipeline associated with the Bradwood Landing LNG Facility.

The Washington State Citizen Committee on Pipeline Safety was established by the Washington State Legislature in 2000 to "advise the state agencies and other appropriate federal and local government agencies and officials on matters relating to hazardous liquid and gas pipeline safety, routing, construction, operation, and maintenance." The committee is Governor appointed and meets regularly to discuss, identify, review and highlight pipeline safety issues on a local and national level. The committee consists of nine voting members representing the public, including local government, and elected officials. Four non-voting members represent owners and operators of hazardous liquid and gas pipelines.

Over the past couple months committee members have reviewed the DEIS for the Bradwood facility, and voted unanimously at our November 29<sup>th</sup> committee meeting to submit the following comments.

## **Construction Related Issues**

- We are concerned about possible jurisdiction, coordination, and expertise issues between the Federal Energy Regulatory Commission (FERC), the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Washington Utilities and Transportation Commission (WUTC). For these reasons we ask that FERC allow the WUTC full access to the pipeline and related construction documents for the purpose of inspection during the construction phase. We also ask that PHMSA grant the WUTC permission to carry out these construction inspections as part of their delegated interstate authority. We ask that this be incorporated in the final EIS.
- We are concerned that the DEIS does not clearly call for the non-destructive (e.g., radiographic or ultrasonic methods) inspection of every girth weld on the pipeline. Given the difficult terrain, the pipeline is highly susceptible to abnormal loading, we ask that the final EIS makes clear that every girth weld will be 100% inspected by non destructive testing, and that these girth weld nondestructive test records be retained and made available to governmental inspectors for the life of the pipeline.
- We concur with FERC that the current amount of information available regarding seismic and landslide hazards is insufficient, and ask that pipeline construction not begin until FERC, PHMSA, and the WUTC are satisfied with the analysis and any proposed routing changes and mitigation that come from it.
- We are concerned with the level of confidence that FERC seems to put in the use of strain gauges for providing warning against landslides. While strain gauges can be valuable for predicting problems on slow moving slide areas, they provide little or no protection for landslides in geologic formations that make them prone to catastrophic failures (e.g. slopes susceptible to high hydrology gradients such as that in Western Washington). This again points to the need for better analysis of landslide areas and rerouting if necessary.
- The use of HDD to get under streams and landslide areas is extensive in the construction plans. While we do support the use of HDD in such situations, we also know that even with the best geologic analysis HDD can fail. For this reason we ask that the final EIS clearly state what methods will be used in each situation if the HDD methods turns out not to work in an area. For streams this would include which method would be used in place of HDD, and for slide areas this would include whether the pipeline will be rerouted to avoid the slide or what other mitigation may be employed.

- Sometimes, during the HDD process under streams frac-outs occur that can dump harmful quantities of fine silt materials into fish bearing streams. In the DEIS it states that response to such frac-outs would occur within 30 minutes. We believe that the detection and response to frac-outs should occur much quicker than 30 minutes and we would like to see this reflected in the final EIS.

### **Right-of-way Issues**

- It is our understanding that FERC has a policy to encourage the use of existing right-of-ways when possible. It is unclear from the DEIS exactly why this proposed pipeline from the Bradwood facility is not following the existing KB Pipeline for more of its route through Washington. Please either explain this more explicitly in the final EIS, or require this pipeline to follow that existing KB Pipeline right-of-way since they are both going to the same place.
- The DEIS states that this proposed pipeline would be serving the Beaver power plants. This would appear to make the KB pipeline obsolete, and its existing right-of-way more available for this proposed pipeline. Please discuss the future need for the KB pipeline, and why the replacement of that pipeline with a larger pipeline was not considered as an alternative to the Washington part of this proposal.
- The DEIS states that after construction trees will be planted on the right-of-way in forest areas and wetlands within 5-15 feet of the pipeline to reduce the visual impact and protect habitat. The DEIS also states that property owners will not be allowed to plant trees anywhere on the permanent fifty foot right-of-way. We support the planting of trees as suggested for forest and wetland areas, and ask that similar planting also be approved for property owners in consultation with the pipeline operator.
- The DEIS states that after construction trees will be planted on the right-of-way in forest areas and wetlands within 5-15 feet of the pipeline, and that such plantings will create a nearly full canopy cover. While we support this planting of trees, and ask that it remains a part of this plan, it does bring up the question of how the company plans to meet its inspection obligations under CFR 49 Part 192.705. Please describe in the final EIS what inspection methods the company plans to use if a nearly complete canopy precludes aerial inspections.

### **Proximity to Residences**

- The DEIS states that there are six residences within Washington State, which are within 100 feet of the pipeline. We appreciate the care taken to try to avoid residential areas as much as possible, but according to the C-FER

Technologies report (A Model For Sizing High Consequence Areas Associated With Natural Gas Pipelines - 2000) that is used to help determine high consequence areas, these residents, and probably others, are well within the hazard area. We ask that the final EIS include a list of all residences within the hazard area as defined by the C-FER Report, and that either the route be adjusted to remove these residences from the hazard area, or that an explanation of why that is not possible be given.

Thank you for considering our comments on this proposed facility. If you have questions feel free to contact me.

Sincerely,



Carl Weimer, Chairman