



**FERC Staff Draft Environmental Impact Statement for the Oregon LNG Project
Docket Nos. CP09-6-000, 001 and CP09-7-000, 001);**

The purpose of this letter is intended to transmit the City of Astoria's concerns with the Draft Environmental Impact Statement (DEIS) regarding construction of a liquefied natural gas (LNG) pipeline to serve a proposed LNG storage and export facility in Warrenton Oregon.

Quoting from the DEIS for the construction of the LNG pipeline:

"The first spread would include the pipeline from its beginning at MP 0.0 to MP 33.0. The contractor and pipe storage yard for this spread would be at Tongue Point in Astoria. From the contractor and pipe storage yard, trucks carrying construction loads would most likely travel west along U.S. Highway 30 (also known as Marine Drive) from Tongue Point to either State Highway 202 southbound or continue across the Youngs Bay Bridge on Highway 101. From Highway 101 southbound, trucks would continue south along the Oregon coast and then east on U.S. Highway 26 towards pipeline access roads. From Highway 202, trucks would use multiple county or local access construction roads to reach the pipeline alignment. About 486 heavy truck and 812 personnel vehicle/light duty truck trips per day would be needed to construct this segment."

The impact to the primary route through the City would be the following:

U.S. 30 East Astoria (@ Safeway):

Up to an 18% increase in daily traffic
Up to an 96% increase in daily truck traffic

U.S. 30 West Astoria (@ Roundabout):

Potential 11% increase in daily traffic
Potential 71% increase in daily truck traffic

Direct impacts to transportation infrastructure will be limited to Oregon Department of Transportation (ODOT), Federal (Job Corps/U.S. Coast Guard), and Port of Astoria facilities. However, indirect impacts to the City's transportation network would also occur. With increased traffic volumes, traffic will seek less congested alternate routes by off-tracking to parallel City streets. Additionally, the anticipated increase in truck traffic could have a similar effect as passenger vehicles seek routes that are more comfortable due to less major roadway wear and tear.

The City's aging underground infrastructure (water, sanitary sewer and storm) could experience accelerated deterioration in locations with inadequate cover or where other structural issues are present.

This significant increase in truck traffic could have negative impacts on the chairwall, utility tunnel, and elevated sidewalk system in downtown Astoria. These structures are approaching 100 years old and any added vibration and load repetition could potentially have costly negative impacts.

It is unclear whether State and Local fuel tax will have the ability to fund the needed road restoration improvements upon completion of the project. In order to utilize this funding, fuel for the project would need to be purchased in the State and City respectively.

The proposed staging area on South Tongue Point poses challenges regarding potential impacts to City streets and facilities. The City of Astoria Development Code, which governs all new development proposed in the City, requires a traffic impact study (Article 3.015.A.5) for the following:

- Changes in intensity of use
- An increase in site traffic volume by 400 average daily trips (ADT)
- Potential impacts to key biking and walking routes
- An increase in adjacent streets by vehicles that exceed 20,000 pound gross vehicle weights by 10 vehicles per day
- Potential degradation of intersection level of service (LOS)

That being said, the City of Astoria requests more detailed analysis within the DEIS that would address traffic safety and traffic congestion from the additional heavy truck traffic. Furthermore, the City requests additional analysis on the impacts to utility infrastructure and structural infrastructure such as the chair walls, utility tunnels and elevated sidewalk system. A review of these issues nor an alternatives analysis on alternate staging areas are not currently contained in the DEIS.

The City of Astoria requests that the concerns listed above will be taken into serious consideration and addressed in subsequent iterations of the DEIS. If there any question, please feel free to contact me at 503.325.5824 or bestes@astoria.or.us.

Sincerely,

R. Brett Estes
City Manager