

**HABITAT COMMITTEE PROPOSED ACTION FORM**

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**HC Sponsor:** Stuart Ellis

**Title of Issue:** Letter regarding proposed Liquefied Natural Gas Terminal on Columbia River

**Deadline (if any):**

**Proposed Action:** Letter for Council signature

**Addressed To:** The Honorable Magalie Roman Salas, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE  
Washington, D.C. 20246

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**Description of Issue:** Northern Star Gas LLC has proposed building a liquefied natural gas terminal at approximately river mile 38 in the Columbia River. The proposed project would include docking facilities, ship turning basin, 2 storage tanks, a vaporization facility and a 34 mile pipeline to connect to existing natural gas distribution systems. The vaporization and storage facilities will be constructed at an abandoned saw mill site. The project requires a FERC license. The proponents are currently in a "pre-filing" process with FERC.

**Description of Regional Significance:** This project could have adverse impacts to fish habitat from both the construction and operation and maintenance dredging of the facility. It may also have adverse effects on other river users because of the high security precautions required for LNG tankers and facilities.

**Potential Adverse Impacts to EFH?**  Yes  No

**For Which Species?** Primarily salmon, but possibly some Council managed marine species may be identified in the area

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**Potential Benefits of Proposed Action:**

Sending a comment letter to FERC would address the Council's responsibility to comment on federal permitting processes affecting EFH.

*Attach draft document for Habitat Committee consideration.*

# DRAFT

Magalie R. Salas, Secretary  
Federal Energy Regulatory Commission  
888 First St., N.E., Room 1A  
Washington, DC 20426

**Attention – OEP/DG2E/Gas Branch 3 (PJ-11.3)**

**RE: Docket No. PF05-10-000**

Dear Ms. Salas:

The Pacific Fishery Management Council (Council) is writing to comment on the Bradwood Landing Liquefied Natural Gas Project. The Council understands that this proposal is still in “pre-filing” status, but that comments are being accepted.

## **Essential Fish Habitat Consultation Mandate**

The Magnuson-Stevens Fishery Conservation and Management Act (MSA), as revised in 1996, requires federal fishery management plans to include essential fish habitat (EFH) descriptions. The MSA includes the following definition relative to salmon:

“EFH for Pacific coast salmon fishery means those waters and substrate necessary for salmon spawning, rearing, breeding, feeding, or growth to maturity, needed to support a long-term sustainable salmon fishery and salmon contributions to a healthy ecosystem.”

Likewise, the MSA requires federal agencies, such as Federal Energy Regulatory Commission (FERC), to consult with NOAA Fisheries on activities that potentially could impact EFH in order to conserve and protect such habitat. In making project licensing decisions, FERC must minimize any potential acute and cumulative impacts to salmon and other marine fish habitat from the construction and operation of the facilities. In order to fully assess and minimize impacts to EFH, FERC should also consult with other federal, state, and local resource agencies and Indian Tribes, including fish, wildlife, recreation, and land management agencies.

We are concerned that time pressures to complete the permitting process may hamper a full analysis of potential impacts. The Council realizes that it is still early in the permitting process, and that documents such as the draft resource reports are not yet available, but we wish to notify FERC of our basic concerns with this proposal.

## Potential EFH Concerns

- The lower Columbia River is an important rearing area for juvenile salmonids from all Columbia River populations including Endangered Species Act-listed populations, and is a migration corridor for adult salmonids.
- The lower Columbia River is also EFH for certain Council-managed marine fish that spend various parts of their life histories in the estuary.
- The project proponents should fully address impacts and mitigation measures from:
  - a) construction of the facility and pipeline;
  - b) dredging the ship turning basin and channel, and;
  - c) operation of the facility including any biological effects of water withdrawals and waste water releases.
- Cumulative impacts should be examined relative to other proposed or allowed activities that adversely affect EFH.

In addition to EFH issues, we have concerns related to security needs for tankers transiting through areas used by sport and commercial fishermen in the lower Columbia River and near ocean areas. Should the project go forward, the Council hopes that fishing activities will not adversely affected.

The Council looks forward to learning more about this proposal and may wish to offer more detailed comments on the EFH consultation at a later date.

We appreciate your attention to our concerns and suggestions.

Sincerely,

*Draft*

Donald K. Hanson  
Chairman

PFMC  
02/21/06