

Natalie Ranker  
414 Simpson Ave  
North Bend, OR 97459

Andrew H Stamp, PC  
Attorney at Law  
4248 Galewood St  
Lake Oswego, OR 97035

Re: AP-19-002

5/31/2019

Dear Hearings Officer Stamp and Commissioner Rolfe,  
On Oct 21, 2014 the Coos County Board of Commissioners adopted and signed Order No. 14-09-062PL, File No. HBCU-13-06, approving a conditional use permit to authorize development of the Blue Ridge alternative alignment for a portion of the Pacific Connector Gas Pipeline (PCGP) subject to Conditions of Approval. The county has extended the permits since then. County codes allow for extensions for 3 years and beyond if JCEP is not at fault for delays. However, JCEP is at fault and should not be granted the extensions for the following reasons.

The county was in error in granting additional CUP extensions on Non-Resource lands after the permit had expired and beyond two years from the date of the original extension. Mr King's extension application is dated Nov 17, 2018 and stamped received by the county on Nov 20, 2018 and does not comply with the allowable receipt date of Nov 9, 2018. The application is unsigned and not dated and nothing is entered in the "Reasons" category.

The applicable criteria is 5.2.600(2) (2013) relating to non-resource CUP permitted use. The provision allows for one extension of up to 2 years, and it requires that use or development begin within the first 2 years from the date of approval, or a new application is necessary. Nothing has happened in over four years. Any changes to the provision since 2013 are not applicable to the extension request. The extension of the permit on non-resource lnds has exceeded the time limit of 2 years as well as the new limit of 4 years.

The county is aware that landowners have not consented to this application. The county is also aware that the applicant may not and will not obtain federal approval to build some segments of the proposed pipeline. In fact, on March 29, 2019, the Federal Energy Regulatory Commission (FERC) released their Draft Environmental Impact Statement (DEIS). The DEIS compares different alternative routes for the pipeline. FERC is requiring JCEP and PCGP to use the route ORIGINALLY proposed through Coos County in 2015 instead of going up onto Blue Ridge. FERC has stated "Based on our analysis as described in the Draft EIS, we conclude that four route variations would be preferable to the corresponding proposed action. We are recommending that Pacific Connector incorporate the Blue Ridge Variation, the Survey and Manage Species Variation, the East Fork Cow Creek Variation, and the Pacific Crest Trail Variation into its proposed route for the project." DEIS: Executive Summary, pp.3-21 The route is called the "Blue Ridge Variation" because it is a variation that avoids Blue Ridge.

The county is aware that this permit would constitute a cloud over the landowners' ability to sell or otherwise fully <sup>use</sup> and enjoy their property. This has been going on now for five years. The county must prevent further damage to landowners by denying the extension. The applicant should be forced to reapply when it has designed an alignment that will be approved by FERC.

Exhibit: 2  
Date: 5/31/19

The FERC permit is not the cause of the delay in beginning construction because it will not authorize the pipeline approved by the county, only portions of it. Thus, a new permit will have to be obtained from the county. Also, the FERC permit will not cure the default because it will not issue within the current approval period, and the applicant has not determined that it will begin construction if they receive it since it will only make its final decision after the permit has been issued.

Also, the applicant was responsible because they continue<sup>d</sup> to change the project presented to FERC and because they have failed to even attempt to satisfy FERC's economic test when it did propose the project approved by the county over 5 years ago. Thus, due to their failure to complete their application to FERC's approval, the applicant is responsible for not being able to begin the construction of this phase of the pipeline.

This has gone on for far too long, and it is long past time for the landowners to be granted full ownership and access to their property.

The question has also been raised as to Mr Stamp's ability to render an unbiased judgement on this matter. For years, he and his staff have been receiving remuneration from the county for decisions regarding JCEP. I'm sure research will show that this has been highly lucrative. There is the possibility that this may lend itself to continued judgements in favor of JCEP.

Finally, I would like to request an extension of the open record period, so that more research can be done.

Respectfully submitted,

A handwritten signature in cursive script that reads "Natalie Ranker". The signature is written in black ink and is positioned above the printed name.

Natalie Ranker

## Evidence of the FERC decision to avoid the route on Blue Ridge

On March 29<sup>th</sup>, the Federal Energy Regulatory Commission (FERC), which is in charge of reviewing the application for the gas pipeline and the LNG export terminal, released the Draft Environmental Impact Statement (Draft EIS), which is the official collection of impacts the project would have and compares different alternatives.

FERC wrote that they want Jordan Cove and Pacific Connector to use the route **originally** proposed through Coos County in 2015 (which they have now named Blue Ridge Variation) instead of going up on Blue Ridge:

"Based on our analysis as described in the Draft EIS, we conclude that four route variations would be preferable to the corresponding proposed action. **We are recommending that Pacific Connector incorporate the Blue Ridge Variation,** the Survey and Manage Species Variation, the East Fork Cow Creek Variation, and the Pacific Crest Trail Variation into its proposed route for the Project." – *Draft Environmental Impact Statement: Executive Summary page 3-21.*

The route is called "Blue Ridge Variation" because it is a variation that avoids Blue Ridge.

(See accompanying map)

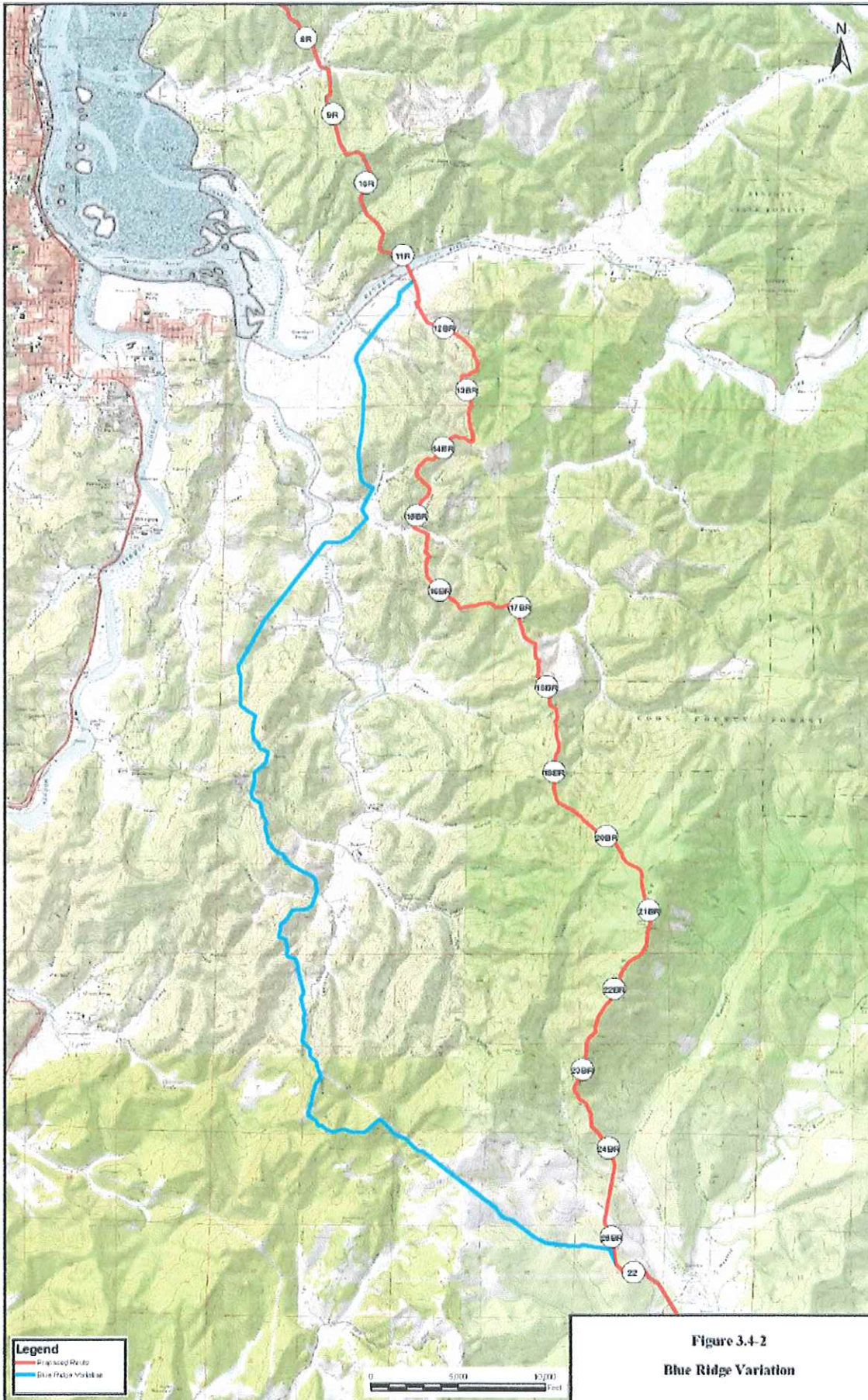


Figure 3.4-2  
Blue Ridge Variation