

Oct. 14, 2019

Coos County Planning Department
To attn of: Andrew Stamp, Hearings Officer
250 N. Baxter St.
Coquille, OR 97423

Re: Coos County File No. HBCU-19-003

Dear Mr. Stamp,

Thank you for considering my comments related to the JCEP application for permits to conduct construction activities for components serving its overall proposed LNG energy project. I have concerns about the viability of project construction and (or) use of a Concrete Batch Plant, a Laydown Area, and proposed Temporary Housing in view of very elevated tsunami inundation and liquefaction hazards associated with the highly unstable soil type (sand) found at the sites of intended construction.

The planned Concrete Batch Plant and a Laydown Area (utilizing the entire Boxcar Hill Campground property), while just a few yards outside a mapped tsunami inundation zone, is located in a "high" to "very high-risk" zone from liquefaction of the soil base.(1) The immediate impact from an extreme subduction zone earthquake and predicted water-saturated sand base liquefaction would have the ready potential to destroy buildings, equipment, and materials at these sites and reasonably threaten the lives of people who may be working at those two facilities. Also, workers off-shift who were likely to be sleeping at the Temporary Workforce Housing could attempt to flee the known tsunami hazard there, seeking refuge at the nearby Laydown and Batch Plant areas, only to tragically find their ability to do so prevented by the destruction from combined violent ground shaking and unexpected impacts of liquefaction, which did not follow, but exceeded the mapped tsunami inundation limits and suggested soil liquefaction impacts. Destruction from the 2011 Fukushima earthquake and tsunami did exceed these types of projections.

The Temporary Workforce Housing, located across the Transpacific Parkway from the Batch Plant and Laydown Area, lies almost completely within an area on the Oregon Department of Geology and Mineral Industries (DOGAMI) tsunami hazard map rated extreme high hazard, with the rest of that facility rated at high hazard of inundation from a tsunami.(2) Awakening from sleep, enduring a 5-minute 9.0-9.5 earthquake (unable to stand), escaping a damaged building, then running for safety on the slightly higher ground of the Laydown Area and Batch Plant could find many overtaken by a tsunami generated by a near-shore quake that had occurred just 10-minutes prior. And then again, those two areas may not be safe at all.

The Staff Report notes (pg. 70) that: *"Some of the project is within the High and Very High Liquefaction area and mapped Tsunami overlay. Coos County amended the Coos County*

Exhibit: 5
Date: 10/14/19

Comprehensive Plan and Implementing Ordinance to include earthquake hazards and tsunami overlays in 2015 to include the Balance of County zoning.” Staff Report further states: “The applicant is required to address Section 5.11 as part of the review; however, Staff is unable to confirm this was completed. Therefore, the applicant will need to address this portion for the industrial areas within the mapped area....”. The referenced map showing expected liquefaction zones is found on pg. 71, Staff Report.

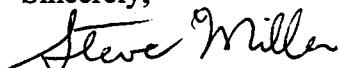
The application for HBCU-19-003 (pg. 66) quotes from Coos County planning documents: “Areas subject to earthquakes include fault lines and liquefaction potential on the 2015 Coos County Comprehensive Plan Natural Hazards Map. Coos County shall permit the construction of new structures in known areas potentially subject to earthquakes (fault line and liquefaction potential) through a conditional use process subject to a geologic assessment review as set out in Article 5.11...” “Staff will notify Oregon State Building Codes by providing a copy of the geologic assessment report at the time of review.”

The staff report summary (pg. 102) states: “The applicant needs to address the Article 5.11 for the Hazard of Liquefaction and provide evidence of compliance with Policy# 5a in the form of an impact analysis addressing the inventoried resources identified by the plan maps.” As a concerned citizen, I am also not aware of any indication that an impact analysis has been done or a geologic assessment presented to the county that would allow staff to “notify Oregon State Building Codes by providing a copy of a geologic assessment report at the time of review...” as required. There does not appear to be sufficient data or information to support approval of this application.

I also see, in the text of the relevant county planning document, no requirement that the county *must* permit the construction of *all* new structures in known areas potentially subject to earthquakes. Simple logic should reveal the potential very high cost in lives lost if the predicted mega-earthquake should occur with its indicated impacts to a Temporary Workforce Housing site, Laydown Area, and Concrete Batch Plant—and any of their occupants. With that should come a sense of responsibility deriving from the public trust inherent in our county’s considerations, which must carry a fiduciary responsibility to those who may benefit or suffer from our recommendations and decisions.

Thank you for your consideration of my comments of concern regarding aspects of this application.

Sincerely,



Steve Miller
1556 N. 20th St.
Coos Bay, OR. 97420

References:

- 1) map, page 71 of current Staff Report
- 2) DOGAMI Tsunami Hazzard Map for Coos Bay