

To: Andrew Stamp, Hearing Officer,  
Coos County Planning

From: Katy Eymann

Re: HBCU-19-003

Date: October 13, 2019

This comment will address the failure of the applicant to three issues: 1) Temporary Housing; 2) Dredge line impact on protected resources and 3) Earthquake/Tsunami Hazards.

1. **Temporary Housing** - Temporary workforce housing located in Township 25S Range 13W Section 03 Tax Lot 200 and Section 04 Tax Lot 100. This use is listed in Section 4.3.200.32 and is subject to Section 4.3.210(27) Temporary Dwelling which lists:

*m) Temporary Residences or Structures – (i) During Construction - For the purpose of temporary habitation shall be permitted during the construction of a permitted or conditional permitted use. Such authorization shall not to exceed one (1) year, subject to renewal by authorization of the Planning Director or designee upon showing that such construction has not been completed and applicable development permits are valid. Section 4.3.210(27)*

**Description of the project**

JCEP proposes to construct temporary workforce housing in the IND zone. Exhibit 2 shows the location of the workforce housing and Exhibit 4 is a conceptual plan that shows the location and layout for the temporary workforce housing. The temporary workforce housing will house construction workers during the construction of the SORSC and the administration building and other aspects of the LNG Terminal. It will include a kitchen and dining facility, a recreation complex, living quarters, and laundry facilities, among other things.

The applicant describes this activity in more detail at JC Revised RR#1 Page 67: (Electronic page 108-109)

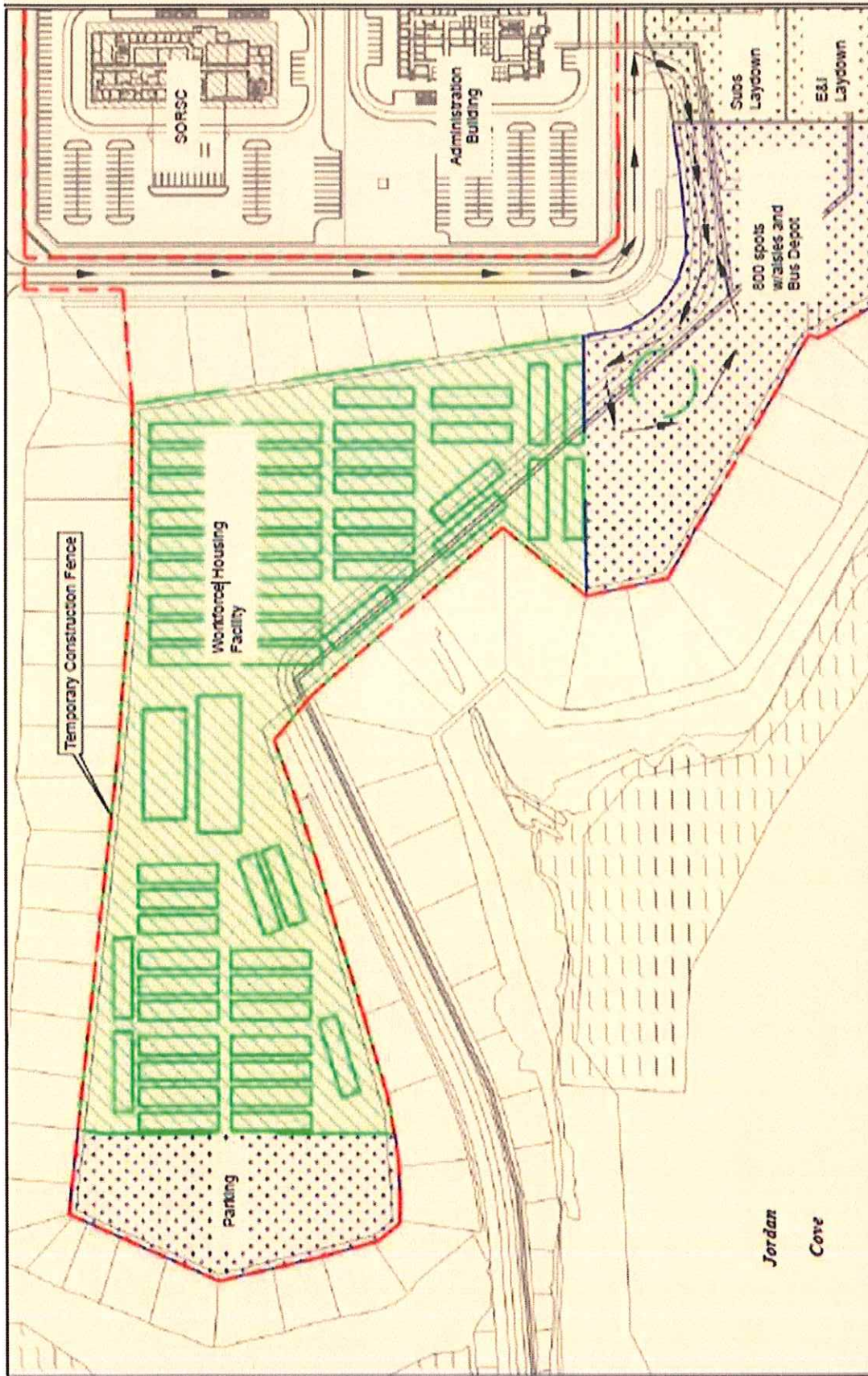
#### **1.5.9.1 Workforce Housing Facility**

*The workforce housing facility was originally planned for the North Point Site in North Bend adjacent to the suburb of Simpson Heights. After consultation with the community and further design development of the facility, an alternate site on the South Dunes Site has been allocated. The workforce housing facility will house personnel, primarily tradesman and supervision who do not live within the community or within private accommodations. The current plan is for a facility that can be built out in 100-bed phases, from an initial 200 to a maximum of 700 with all common facilities built out in the first phase. An example layout is provided in Figure 1.5-8.*

*Parking will be provided on-site, and shuttle buses to and from local communities will reduce traffic on the road network after working hours.*



*After completion of construction and commissioning activities the entire facility would be decommissioned and removed from the site.*

The diagram below from JC Revised Resource Report #1 electronic page 171: (**NOTE** parking area at SORSC. Each of the smaller sections right at the top is around 20 spaces ( 10 on each side).



Jordan Cove Energy Project

Figure 1.5-8

-  Workforce Housing
-  Temporary Construction Fence



Jordan Cove

**Parking:** The current [proposed man-camp does provide the 700 spaces needed for all the projected workers who would live at the man camp site. And then there is the issue of people coming in from all the RV parks, and other off-site housing particularly if they miss the bus. And where would the rest of these thousands of workers and their families live for all the project's projected 4,000 + workers?

**Housing:** The County should follow the recommendation from the Coos County Housing Analysis and Action Plan which was accepted by the Coos County Board of Commissioners.

It recommends the following for Jordan Cove housing:

TAKING ACTION ON HOUSING ISSUES



## Jordan Cove LNG – Building Community Housing for Longevity

**→ The Jordan Cove LNG project proposes the development of a liquefied natural gas terminal at Jordan Cove on the north spit of lower Coos Bay.**

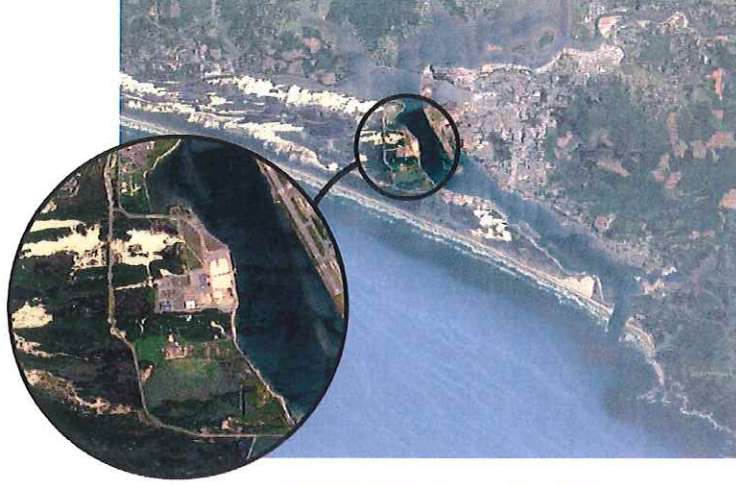
The company owns approximately 400 acres at this location and will stage all development within this area. The project was envisioned more than a decade ago and includes the Pacific Connector Gas Pipeline project, a proposed 229 mile, 36 inch diameter pipeline designed to transport natural gas from Malin, OR to the Jordan Cove LNG terminal.

According to local sources, the construction of the Jordan Cove LNG will take almost 4 1/2 years and employ up to 2000 workers at its peak. The number of Coos County employees at the shipping facility is estimated to employ up to 180 permanent employees on site.

Jordan Cove LNG proposes to house these construction workers in temporary housing on the northeast portion of their site (just south of Jordan Cove Road). This presents a number of concerns that should be addressed prior to any local permitting.

*Will the temporary housing be removed in its entirety to the satisfaction of the county?*

*Will any permanent housing be built that could serve the future employees in the community, either for Jordan Cove LNG or for site or lease to others employed outside of the company?*



**→ While a specific start date for construction has not been set, there are a few notable items that should be contractually negotiated prior to any construction activity:**

2,000 construction workers is a significant workforce - it is equal to fully half the total workforce for North Bend, the nearest city to the development site. At a minimum and in addition to any community impact funds promised by Jordan Cove LNG, there should be contractual agreement for housing to be built for up to 20% of the workforce permanent occupation and dedicated back to the county or sold on the private market to households with incomes at or below 80% of area median income. In addition, this permanent housing could be built on site (with zoning revisions negotiated with the county), under the bridge (at North Point in North Bend) and throughout the cities of Coos County as neighborhood infill development. The estimates for a permanent workforce of 180 support the need for permanent housing. In no case should fewer than 150 housing units be made available for permanent residents - 75% ownership opportunities and 25% rental opportunities.

The Jordan Cove LNG project represents an opportunity for a major employer to take the lead in providing housing for their employees while providing new housing options on the north end of the Coos Peninsula - placemaking opportunities.

Of particular note: Quoting the Action Plan above: JCEP “estimates for a permanent workforce of 180 support the need for permanent housing. In no case should fewer than 150 housing units be made available for permanent residents – 75% ownership opportunities and 25% rental opportunities.” The applicant proposes to remove all the temporary housing. While this may be acceptable in that area which is not zoned for dwellings, the County should require as a condition of this permit that 150 housing units be made available for permanent residents – 75% ownership opportunities and 25% rental opportunities.

## 2. Dredge transport lines

This permit should not be allowed until the Applicant provides the information and studies requested by the Staff Planning report in this case. Specifically,

*The applicant needs to provide the following:*

- ii. A description of resources identified in the plan inventory;*
- ii. An evaluation of impacts on those resources by the proposed use (see Impact Assessment procedure, below);*
- iii. A determination of whether the proposed use or activity is consistent with the resource capabilities of the area, or that the resources of the area are able to assimilate the use and activity and their effects and continue to function in a manner to protect significant wildlife habitats, natural biological productivity, and values for scientific research and education.*

*Where the impact assessment requirement (of Goal #16 Implementation Requirements #1) has not been satisfied in this Plan for certain uses or activities (i.e., those identified above), then such uses or activities shall not be permitted until findings demonstrate the public's need and gain which would warrant any modification or loss to the estuarine ecosystem, based upon a clear presentation of the impacts of the proposed alteration, as implemented in Policy #4a.*

- iii. An impact assessment need not be lengthy or complex, but it should give reviewers an overview of the impacts to be expected. It may include information on:*

- a. *the type and extent of alterations expected;*
- b. *the type of resource(s) affected;*
- c. *the expected extent of impacts of the proposed alteration on water quality and other physical characteristics of the estuary, living resources, recreation and aesthetic use, navigation and other existing and potential uses of the estuary; and*
- d. *the methods which could be employed to avoid or minimize adverse impacts.*

*This policy is based on the recognition that the need for and cumulative effects of estuarine developments were fully addressed during the preparation of this Plan and may be mitigated by the imposition, as necessary, of conditions through the administrative conditional use process.*

*The applicant has provided details on the project, but staff was not able to locate an impact assessment, however, they stated they will be compatible with resource capabilities of this area. The dredge line is temporary, but the applicant should explain how they will ensure these inventoried resources will be protected or if impacts to the habitat how it will be mitigated. This may have been done through other permitting agencies and the applicant should provide the permits. This also may be addressed in the Draft Environmental Impact Statement and if it is then the applicant should provide the applicable section.*

### **3. Earthquake/Tsunami Issues**

County has filed to require the Applicant to comply with Statewide Planning Goal 7 which requires the County to

- a. *avoiding development in hazard areas where the risk to people and property cannot be mitigated; and*
- b. *prohibiting the siting of essential facilities, major structures, hazardous facilities and special occupancy structures, as defined in the state building code (ORS 455.447(1) (a)(b)(c) and (e)), in identified hazard areas, where the risk to public safety cannot be mitigated, unless an essential facility is needed within a hazard area in order to provide essential emergency response services in a timely*

manner.

The Jordan Cove facility and pipeline fit the definition of "hazardous facility:

**ORS 455.447(1)(b) states:**

(b) "Hazardous facility" means structures housing, supporting or containing sufficient quantities of toxic or explosive substances to be of danger to the safety of the public if released.

Goal 7 requires the County to deny this application for this hazardous facility.

Further, the staff report found:

All the IND Zone Proposals are, according to the County's Natural Hazard's Map, subject to inundation from an XXL magnitude local source tsunami event. According to the application none of the IND Zone Proposals have a grade elevation higher than the projected elevation of the XXL magnitude local source tsunami event. Therefore, the IND Zone Proposals are subject to the requirements of the Tsunami Hazard Overlay Zone. *Among the IND Zone Proposals, only the SORSC and helipad are subject to the above, because they are "facilities required for emergency response" and are within an area subject to inundation from a L magnitude local source tsunami event. Therefore, the SORSC and helipad are permissible only if they satisfy the criteria of subsection 5.* These safety facilities are required to be located in the immediate proximity to the proposed terminal operation for effective emergency response. The next emergency response facility is located in the cities of Coos Bay and North Bend which is a significant distance to the site. Given this location priority, there are no reasonable, lower-risk alternative sites available for the SORSC and helipad serving the specific terminal other than the proposed onsite locations. *JCEP will provide adequate evacuation measures at the SORSC that it proposes such that life safety risk to the occupants of the building is minimized. The helipad is not a building.*

Adequate evacuation structures must be provided as a condition of this permit.