

Crystal Orr

From: Steve Miller [smiller4547@gmail.com]
Sent: Monday, September 09, 2019 12:47 PM
To: Planning Department
Subject: Open Record comment on Case No. REM-19-001 (U.S. Coast Guard Security Zone.
Attachments: Security Zone Comment to Mr. Stamp.docx

This Message originated outside your organization.

Hello,

Please find attached below my Open Record comment for Case No. REM-19-001 on issues relating to a proposed U.S. Coast Guard Security Zone.

Thanks you for this opportunity as a resident to comment on concerns I have related to this Case number.

Sincerely,

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

Exhibit 61
Date: 9/9/19

Sept. 7, 2019

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

Re: Open Record period comment: Case No. REM-19-001

Topic: Issues surrounding the U.S. Coast Guard Security Zone for LNG carrier transit of Coos Bay

Dear Mr. Stamp,

Thank you for opening the record on Case No. REM-19-001 for comment providing further information on the U.S. Coast Guard Security Zone for LNG carriers transiting Coos Bay to the proposed Jordan Cove Energy Project. Please find below some of my concerns.

Size and Enforcement of the Security Zone

Conflicting information has appeared in several different JCEP/PCGP applications regarding the actual required 500-meter Security Zone that would move along with LNG carriers transiting Coos Bay. The Security Zone has been incorrectly stated as measuring 500-*yards* around a transiting carrier and public statements have sometimes referred to it as measuring 500 *feet*. In its Comment to the FERC on its DEIS the Oregon Dept. of Land Conservation and Development included a map (Attachment 1) with the Security Zone overlaying and centered on the shipping channel. It clearly shows that on the bay approximately ½ mile north and ½ mile south of the Empire boat ramp, even at high slack tides, when LNG ships could be transiting the bay, the boats of recreational crabbers and fishermen could also be present. To observe the Security Zone these craft would need to leave the water at a ramp or potentially become grounded moving very close to shore. At times approximately 1 ½ hrs. before high tide and 1 ½ hrs. after, on the water extending south from the Empire boat ramp for approx. 3 ½ miles, small craft would virtually need to leave the bay, or risk grounding while moving close to the shore. Approximately 1- 1/2 miles of the bay (in two sections) extending north from the Empire boat ramp to the proposed facility would also be similarly impacted in that time frame.

In addition, salmon fishing within the 500-meter Security Zone would have to cease around high slack tides when an LNG carrier could be transiting and small craft would likewise have to either leave the water or risk grounding while trying to leave the Zone. The designated Security Zone, from the mouth of Coos Bay to the LNG terminal would span virtually the entire fishable width over that distance. It should also be noted that recreational craft are often both fishing and crabbing on the same outing. On some of my outings we have set rings and pots, trolled for salmon for half an hour, then returned to check our crab sets. Doing both can be a

complicated endeavor, with many other boats traveling about, taking part in similar recreational pursuits.

In a Dec. 28, 2018 interview in The World newspaper, a Coos County Sheriff's deputy training to provide security during carrier transit suggested that enforcement of the Security Zone would be flexible. The deputy said that if a boat was known to him or did not appear to him to be a threat to the LNG carrier, the boat would be allowed to continue. That will leave many area residents and especially visiting recreational fishermen and crabbers very unsure about their status in that enforcement regime. Yet the USCG Security Zone is clearly set at 500-meters around an LNG carrier. Confusion remains over this issue as it has not been adequately addressed or made sufficiently clear.

It has also been recently stated by the applicant's legal representation at a Coos Bay public hearing that transits of LNG carriers will be prioritized for the nighttime when possible, to avoid conflict with recreational uses of the bay. That uncertainty will present big residual problems for residents and visitors to the area who have planned bay crabbing and fishing trips, but may not have been able to determine when during that 24-hour period an LNG transit will occur (if at all). Even if all this can be scheduled and accommodated, nighttime transit would bring a host of new, significant impacts to residents living in the vicinity of the bay, which have not been addressed by the applicant.

Nighttime Transit Operations

I have found no mention or analysis of impacts arising from night transit operations when security and safety concerns would certainly be heightened. Residential settings along or near the bay will be exposed to necessarily bright lighting on the LNG carrier, tugs, security assets, and potentially USCG craft accompanying the carrier. It should be expected that some of those craft, in addition to lights for navigation, would employ powerful spot lighting to sweep areas to the side, toward shore. Also, there has been mention by company representatives during Coos Bay Harbor Safety Committee Meetings that horns or bells will sound during LNG carrier transits, but no information provided whether that would continue at night.

Surfer, kayak, paddleboard and various paddle craft use in area of proposed LNG carrier transit

Accurate, up-to-date numbers for these uses is being sought, but apparently information is not readily available for surfing and various small paddle craft use of the area of the bay south of the proposed JCEP LNG terminal. However, it is certain that these uses are growing, with a vigorous surfing community in Coos Bay, paddle boarding being avidly taken up by numerous area residents, and kayaking on Coos Bay growing in popularity over the years (with myself included). The number of small-craft involved in recreational fishing and crabbing on the lower bay is not broken out of much larger official figures. However, Richard Dybevik with Roseburg Forest Products was quoted in a World newspaper article about a new rescue service dock, that on summer days he has counted as many as 100 recreational boats on that lower section of the bay at one time. This constitutes heavy recreational use, which is growing yearly.

Number of LNG Carrier Visits Anticipated Annually

In earlier applications for the proposed JCEP the number of annual trips to Coos Bay by LNG carriers was stated to be approximately 90, resulting in 180 transits in and out of the bay. More recent applications state carrier visits are expected to be up to 120, resulting in 240 transits of the bay annually. It should be noted that at a recent City of North Bend Planning Commission meeting a legal representative for the applicant stated the PCGP specifications were being modified, with a greater pipeline wall thickness and an operating pressure increase from 1,600 psi to 1950 psi. Several recent project applicants on the U.S. Gulf coast and on the British Columbia coast have increased their proposed production capacity as their overall application process neared completion or when newly approved to proceed. With that possibility indicated by the potential increased delivery of natural-gas to the proposed JCEP terminal, it would be reasonable to anticipate significantly more than the stated 120 visits per year would occur sometime in the near future, adding further congestion and inconvenience among overlapping uses present on lower Coos Bay. There are times now during heavy recreational fishing and crabbing use when these impacts already feel very significant to enjoyment of these activities.

where economic resources, natural resources and our endeavors to use and enjoy them converge. These can work together in a harmonious way where the scale and impacts of one doesn't preclude the others.--where there is some balance. But as I have studied the proposals of the JCEP and PCGP I have had to conclude that the combined impacts of these proposed projects, together the largest commercial construction project in Oregon history, despite promises of money for our needy community, will preclude an emerging and diverse future with bright prospects in tourism, recreation, and.

the questions and concerns of a Security Zone and the attempt to fit a massive industrial project into a location very close to population centers---one also rich in valuable natural resources---would not arise.

Honestly, I feel like so many of my concerns, including several with the Security Zone, reduce to the circumstances we find ourselves in on this relatively small estuary, where our natural resources, economic future and endeavors to use and enjoy them converge.

I feel like so many of my concerns with this overall project, including several with the Security Zone, reduce to the fundamental circumstances we find ourselves in on this relatively small estuary, very close to population centers, where our natural resources, economic future and endeavors to use and enjoy them converge---or in this case collide.

If Pembina Pipeline Corp. heeded the guidelines established for siting an LNG terminal by the Society of International Gas Tanker and Terminal Operators (SIGTTO), of which it is a member, all the concerns, complexities, and attempts to fit ("shoehorn" as some opponents have put it) this largest industrial project in Oregon history into a very inappropriate footprint would not

persist. The questions and concerns of a Security Zone we specifically consider in this Open Record request would also not need to be addressed, part of the kind of scenario the SIGTTO standards likely seek to address by guiding its members' to better choices.

Thank you for your consideration of my comments, which I hope may be useful to you in your work as Hearings Officer.

Sincerely,

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

*Note: Most of the mapped area within the light green areas is exposed mudflat at low tides

Attachment 1

