

## Southern Oregon Ocean Resource Coalition – SOORC

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September 9, 2019

Jill Rolfe  
Coos County Planning  
Coos County Courthouse  
250 N. Baxter  
Coquille, OR 97420

Re: County Remand File No. REM-19-001/LUBA Case No. 2016-095; Jordan Cove LNG project

Dear Hearings Officer Stamp and Planning Director Rolfe:

Thank you for re-opening the record to allow more public comments regarding the above case. The Southern Oregon Ocean Resource Coalition (SOORC) received a copy of your Aug. 23, 2019, letter to Ms. Jill Rolfe at Coos County Planning and discussed it at our meeting on Sept. 3.

SOORC represents marine-related interests on the Southern Oregon Coast engaged in existing and proposed uses of Oregon's coastal waterways. SOORC serves as a forum to address issues of common interest to its members and associated industries. The fishermen, processors and businesses that comprise the SOORC board are long-standing members of the community with significant investments in activities related to Coos Bay and the estuary.

We appreciate Mr. Stamp's comments of Aug. 23, 2019, regarding the process of shipping LNG through the Coos Bay estuary. In particular, we are concerned about how the LNG tanker shipments will affect the sport and commercial fisheries that also use the estuary and need to transit the Coos Bay bar, particularly at high tide.

1. Commercial crab vessels need to transit the bar at high slack for safety. The commercial Dungeness crab fishery occurs in the winter and coincides with some of the worst weather of the year. Due to the nature of these storms, usually with southwest winds and high seas, it is imperative that fishermen have access to the bar at high slack. The currents are weaker and the bar is safer. Dungeness crab landings into the Charleston/Coos Bay are valued at roughly \$20 million annually in prices paid to fishermen and represent about one-fourth of the total statewide landings and statewide value. That \$20 million is further invested in the community through processing, purchase of equipment and supplies, salaries to deckhands and employees of local businesses, etc.
2. Other commercial fisheries require access to the bar during high tides as well. Collectively, the Charleston Marina is home to more than 200 commercial and recreational vessels. In addition to Dungeness crab, commercial fishermen transit the bay and the bar to harvest groundfish (a group of about 80 species that include bottomfish, rockfish, roundfish species, flatfish species and others); albacore tuna; salmon; coldwater pink shrimp; squid and more. While these vessels may not always require egress or ingress at high tide, they must be allowed to transit at a time

that provides the safest conditions. For example, a loaded salmon troller may not be able to wait 30 minutes or more to cross the bar when the seas in the summertime build quickly from the northwest; the vessel captain must time his bar crossing in accordance with the safest conditions of the wave series. Some of these times may be at high tide.

Commercial fisheries, including Dungeness crab, contribute more than \$40 million annually to the Charleston/Coos Bay/North Bend area based solely on ex-vessel figures (prices paid to fishermen). Like the Dungeness crab value, that money is re-invested in the local community through several channels.

3. Recreational fisheries require access to the bar. The Charleston/Coos Bay area is home to several individual recreational fishermen, charter businesses and marine stores that cater to commercial and recreational customers. Many of these sport fishermen who fish for rockfish, tuna, salmon and crab in the ocean also need access to the bar when it is safest to cross, just like commercial fishermen do. Many reside here but many more come to visit the Coos Bay area and bring with them investments in local businesses and marine supply stores. They also use port facilities to dock and to access the bay.
4. Recreational fishermen use the lower bay. Some sport fishermen prefer to fish the bay instead of the ocean or are limited to fishing only the bay due to vessel size. Many of these recreational users fish for crab near the mouth of the bay and in the lower bay, where the LNG ships would be traveling and docking. The safety/security zone, as proposed, would force these users to the extreme shallow waters while tankers were moving or force them out of the water completely, thereby interrupting their fishing trips. The loss of these sport users would ripple out to local restaurants and hotels and other community businesses.
5. Tides affect transits for sport and commercial fishermen. As noted by other commenters, spring tides – those tides coinciding with or just after a new or full moon, when the difference in height between high and low water is the greatest – also coincide with some of the best times for crabbing in the lower bay for recreational fishermen. Because of the proposed security zone for LNG tankers during this time, recreational crabbers would likely not be allowed to set out crab pots or stay near them when tankers were transiting the bay. This would lead to a loss of recreational effort to the industry and the community.

For commercial crabbers working in the winter, especially when a spring tide is occurring, crossing the Coos Bay bar at high slack is imperative. Crossing a half hour or more before or after high slack is extremely dangerous: strong currents as a result of large volumes of water, due to the greater height difference between low and high tide, quickly cause dangerous conditions at the bar – especially for smaller vessels. LNG tankers crossing at this time could restrict commercial fishermen, especially crabbers, from accessing the bar at the safest times of the day. This runs counter to the public's right to access a public waterway that is fully utilized, especially during winter.

6. Summertime tides and weather affect sport fishermen. As mentioned above, some of the best crabbing occurs during high slack tide, particularly during spring tides. Some of the best fishing for other fish species in the bay also takes place during the daily high tides. In the summer, salmon fishermen utilizing the bay for recreational fishing and during salmon derbies would likely miss some of the best fishing due to LNG tanker transits. Halibut and albacore tuna derbies

also occur during the summer and tanker transits could affect the number of participants and safety of the recreational fleet.

7. Night fishing is routine for commercial fishermen; sport fishermen also access the bar and lower bay at night. Commercial fishermen are more accustomed to fishing and crossing the bar at night, with their business operations dictated by seasons, offshore weather, processing plant schedules and consumer demand. However, an increasing number of recreational fishermen also fish at night – either in the lower bay or the ocean – usually leaving before the break of dawn. Spring and summer marine weather is typified by high north- to northwest winds that come up in the afternoon, making the seas very choppy and bar crossings difficult, even at high tide. Thus, the size of the proposed security zone would make their bar transits even more difficult and confine sport fishermen to areas of the bay that are unsafe, particularly in the summertime when the wind/sea combinations create problematic shoreline water reflection conditions for smaller vessels.

Therefore, the members of SOORC respectfully request you seriously consider the effects of LNG shipping on and safety of the existing commercial and recreational fishermen, processors and related businesses – and their value to the local community.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan Chambers', with a long horizontal flourish extending to the right.

Susan Chambers, SOORC chair