

June 10, 2019

Larry and Sylvia Mangan's comments on County Remand File No. REM-19-001/LUBA Case No. 2016-095

We are landowners along Haynes Inlet a northern arm of the Coos Bay estuary. Two of the proposed Pacific Connector Gas pipeline routes cross our property and would harm our ranch, its operation, and natural and cultural resources existing on our land. Please accept our comments as affected parties and intervenors to the Jordan Cove proposal.

**1. There is no substantial public benefit to the proposal in the Coos Bay estuary and the proposal will adversely affect the public's use of its own public trust resources.**

Specifically, recreational crabbing in Coos Bay will be adversely affected by the ingress and egress of the large ocean going LNG vessels which must have a yet-to-be-determined security buffer around them. This security buffer will likely have a moderate to severe impact on the recreational crabbing (and fishing) in the lower bay, from the vicinity of the proposed LNG plant down the shipping channel and out through the bar and to an undetermined distance into the ocean.

The applicant maintains that the disruption of the recreational crabbing will be minimal because the incoming and exiting tankers will be timed to occur only during the slack high tides leaving, as they contend, the recreational crabbers will have the entire rest of the tide cycles to conduct their activities.

These are the mistaken assumptions written by someone who seemingly has never crabbed. We have crabbed in the Coos Bay estuary many times with our children, friends and out of town visitors. In fact much of our recreational crabbing activity has been near the proposed LNG plant in areas that would be affected by this project. Our family would launch our small boat at either the BLM North Spit boat ramp or the Empire boat ramps and crab in the areas immediately adjacent to the shipping channel.

The only effective (and often safe) time for most folks to crab is at the high slack tides, the same tides that the LNG tankers are proposed to move through the area. At high slack tides, crabs move out of the shipping channel and other areas and into shallower areas (we found that at about 25 feet depth was a good depth to put out our crab traps) where they would feed. It's at this time when crabs can be caught.

When the tide is moving up to high or down toward low, movement of the water can be extreme and the crabs are more interested in holding in place than actually feeding. When the crabs are actively feeding is the only realistic time when they can be captured in rings or traps.

Consequently, the ingress and egress of the LNG tankers with their undetermined security zone, will likely have a huge affect on the recreational crabbing.

The assertion by the applicant that there will be very limited affect on recreational crabbing has no merit, and sounds like it was written by someone at a desk in Portland, or perhaps more likely, at a desk in Calgary.

**2. The applicants economic study is seriously flawed.** Not only is the applicant's economic study not up to date, with current energy pricing, it can not compete with other facilities, proposed, under construction and in operation. But even more revealing is Pembina's tacit acknowledgement that their economic justification is flawed. Three recent events have

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