



April 19, 2019

To: Jill Rolfe
Coos County Director of Planning
225 N Adams Street
Coquille Oregon 97423

Subject: Coos Bay Chapter Surfrider Foundation comments on AM-18-011/
RZ-18-007/HBCU-18-003

The Coos Bay Chapter of the Surfrider Foundation works within the greater Coos County area focusing on a variety of programs, stewardship activities, campaigns and fun events – all for the love of local ocean, waves and beaches. The chapter serves Coos County with the longest running beach water quality monitoring program ([Blue Water Task Force](#)) in the state of Oregon.

Our chapter is dedicated to protecting our local beaches, oceans and estuaries for the benefit of current and future generations. As such we feel that this project will have adverse impacts to the estuary, sloughs, bay environment and the people living, working and enjoying Coos Bay and the near shore environments.

The applications related to the NRIs fail to address major issues associated with the proposed changes. Examples of some of the key findings addressed by other commenters are summarized in the numbered list that follows.

1. The applicant has failed to address the cumulative impacts of multiple environmental stressors associated with the overall activities needed to render the NRIs of use.
2. The applicant's assertions regarding the productivity of sub tidal habitats are inadequately substantiated. The applications universally under estimate the scale of the likely impacts The applications universally understate the duration of the likely impacts
3. Noise impacts associated with the proposed work not adequately addressed.
4. Impacts to diving waterfowl and other living resources dependent on portions of the estuary in the vicinity of the proposed NRIs are not considered but are a likely



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consequence of the proposed actions. Examples of impacted species include but are not limited to Surf Scoter, Pacific, Red-Throated, and Common Loon, Western, Red Necked, and Eared Grebe, Greater Scaup, Common Goldeneye, Brant Goose, Pacific herring, Dungeness crab, Eulachon and sand shrimp.

5. The applications do not adequately address the telegraphic effects of the proposed work on adjoining portions of the estuary including but not limited to increased wave impacts to adjacent sub tidal and intertidal shoreland habitats.

6. The applications do not adequately address the telegraphic impacts linked to Increased wave and hydrodynamic impacts to eelgrass and surf grass habitats adjacent to the NRI's

7. The applications do not adequately address the specific dredging methods to be employed or the potential shore side impacts associated with mobilization and demobilization of dredging equipment.

8. The applications do not adequately address the potential impacts of the dredging operations and dredged material transfer operations to Marine mammals including, California Sea Lions, Harbor Porpoises, Killer Whales and resident breeding population of Harbor Seals.

9. The proposed work does not appear to be necessary for the type of navigation proposed by the applicant.

10. The Public Benefits of the project are not adequately substantiated.

11. The applications do not address potential safety considerations resulting from modifying the hydrodynamic characteristics of the navigation channel. Expansion of the width of the navigation channel as a result of the construction of the NRI has potential to enhance the propagation of tidal and tsunami wave energy in the estuary posing a potential increased threat of harm to people and property in the estuary and impacts to living resources resulting from alterations of the salinity characteristics of the estuary.

12. No mitigation has been proposed it offset anticipated and likely impacts associated with the proposed work.

In addition to the above, Surfrider believes the very resources that the Coos Bay Estuary Management Plan is intended to project, will be in jeopardy. The Jordan Cove LNG export terminal and tankers would not only place our estuary in danger, put more



than 16,000 people in the Coos Bay area inside a possible hazardous burn zone as well.

The Sabine Pass LNG export facility in Louisiana is an example of the danger that this LNG project will impose on our estuary and associated communities.

The Sabine Pass is one of two LNG export facilities that is up and running in the U.S., and was shut down by federal regulators because of a leak that put the environment and workers at risk.

Supercold LNG leaked into the space between the inner and outer walls of two of the newer LNG storage tanks. The minus-260 degree LNG created multiple 1-foot to 6-foot cracks in the carbon steel outer tank wall, allowing LNG to escape. One tank was actively leaking gas vapors at 14 sites along the base of the tank. When the issue was finally brought to the attention of federal regulators, two of the five storage tanks were shut down.

The order issued by the federal Pipeline and Hazardous Materials Safety Administration (PHMSA) said that, “after considering the presence of approximately 500 Sabine employees and contractors onsite, the potential for disruption to major transportation modes (including highways and waterways), the adjacent environments and the hazardous nature of the product being stored, the unpredictability of brittle failures and ignition sources, the newly-discovered history (2008-2016) of similar problems that have been present since the Facility came on-line, the uncertainties as to the cause of the Incident, and the ongoing investigations to determine the cause of the Incident, I find that a failure to issue this Order expeditiously to require immediate corrective action would result in likely serious harm to life, property, and the environment.”

These recent events at LNG storage facilities should act as warning to our communities that LNG disasters can happen. It’s not a question of “if”, but “when”.

Please deny this application.

Sam Schwarz
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