



July 4, 2019

**To:** Kimberly D. Bose  
Secretary, Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

**Subject:** Coos Bay Chapter Surfrider Foundation comments to the Draft Environmental Impact Statement for the Jordan Cove Energy Project, Docket Nos. CP17-494-000 and CP17-495-000

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, waters and engaging the next generation of coastal defenders. As such we insist that FERC deny this project, with **prejudice!**

Others will comment on the adverse and long term impacts to endangered species including the Northern Spotted Owl, Marbled Murrelet, coho salmon to name but a few. Surfrider will highlight the projects long term adverse impacts to the American citizens who live and work in the Coos Bay area.

**A. Longterm Adverse Affect to Public Safety**

FERC's summary for the DEIS dated 3/29/2019 states "*We conclude that constructing and operating the Project would result in temporary, long-term, and permanent impacts on the environment. Many of these impacts would not be significant or would be reduced to less than significant levels with the implementation of proposed and/or recommended impact avoidance, minimization, and mitigation measures.*"

FERC must deny this application with prejudice, because the applicate does not incorporate the Society of International Gas Tanker and Terminal operators LTD



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(SIGTTO) industry standards in the siting of the terminal, turning basin and shipping channel as described in SIGTTO information paper no. 14:

1. *"LNG terminals should not be sited in areas close to population centers"*. FERC must deny this application if for no other reason than the safety of approximately 28,000 United States citizens who live within five miles of the proposed project. Many of those residents live within Zones 1 (yellow) and Zone 2 (green). When an LNG spill and subsequent ignition occurs, those residents not killed outright in Zone 1, will receive 2nd degree burns in Zone 2.
2. *"Place LNG terminals in sheltered locations remote from other port users"*. The proposed terminal site is surrounded by existing port facilities, including Roseburg Forest Products, Southwest Oregon Regional Airport as well as eight additional terminals and docks.
3. *"Simultaneous LNG operations and ship movements in adjacent berths should be avoided"*. The Roseburg Forest Products dock is immediately adjacent to the proposed Jordan Cove terminal. Southport Forest Products and D.B. Western dock facilities are immediately south of the proposed terminal. The potential for accidental ship to ship impacts is the reason that LNG terminals should be sited away from busy shipping lanes.
4. *"LNG terminals should not be sited on an outside bend of a shipping channel"*. To minimize the risk of other ships colliding with a berthed LNG tanker is a ship fails to make the turn. The proposed terminal site is in the outside bend of the bay, just down stream of the railroad swing bridge. This is a particularly hazardous turn for existing size ships, let alone the larger, less maneuverable LNG carriers.
5. *"LNG Tankers should have a ready escape route to open water"*. FERC must deny this application because at tides lower than 6 feet, a loaded LNG tanker cannot leave the terminal as there is insufficient water under the keel in the Federal navigation channel.
6. *"Harbor channels should have a minimum width equal to five times the width of the largest ship to allow for safe maneuvering"*. A typical LNG carrier is 160 feet wide and 990 feet long.  $5 \times 160 = 800$  feet. Most of the Coos Bay channel is only 300 feet wide. FERC must deny this applicant as this recommendation is not close to being met.

In addition to the above, FERC must deny this application because the terminal site is located on a sand spit, in a Tsunami zone and within the Cascade Subduction fault zone. The "Tsunami Risk reduction strategies" are woefully inadequate. To even suggest that "tugboats will hold LNG vessel in place during an event" is ludicrous at best. The overdue subduction earthquake and associated tsunami will not only cause potential fire and associated human damage, but also the proposed

deepening and widening of the channel with this project would increase the extent of the tsunami effects. The increased volume of water that could be moved into the bay will increase the predicted damage, and displacement in our region. The entire extent of this has not been dealt with in revised mapping. Until these issues are addressed, FERC must deny the applicant.

FERC must deny this applicate, with prejudice, because of the safety issues associated with the amount of additional hazardous material truck traffic on State Highway 101 and as the impact to the local transportation system. During startup and operation of the project, Jordan Cove estimates 22 refrigerant make-up trucks, 8 amine trucks, 4 nitrogen trucks, 160 aqueous ammonia trucks, and 28 diesel trucks would be needed at the site annually. The most frequent truck deliveries would occur during commissioning and startup activity at the site and would deliver refrigerants to load the liquefaction trains. Between 15 and 20 trucks are expected over an approximately 2 week timeframe to load each liquefaction train. The refrigerant deliveries would be repeated for the startup of each subsequent liquefaction train. The amount of hazardous material transportation on often narrow, two lane roads is a recipe for disaster.

## **B. Longterm Adverse Impacts to Livability**

FERC must deny the applicant, with prejudice, as the proposed project will have longterm adverse impacts to the livability of the Coos Bay Area.

### **1. Housing**

DEIS 5-11 states *“Specifically, we conclude that constructing the Project would temporarily but significantly impact housing in Coos Bay and that constructing and operating the Project would permanently and significantly impact the visual character of Coos Bay”*. Such impacts will reverberate through this community well past the three years of proposed construction activities.

- The Housing Analysis and Action Plan for Coos County Oregon 2018 Rental Gap Analysis states *“P18 Housing in Coos County is increasingly impacted by fewer job opportunities and lower wages for residents. A homeowner or tenant’s ability to afford housing is determined by their income potential within the community in which they live and work. That potential has gradually diminished over the past two decades as the economy has transitioned to the lower-wage service sector..... There is a deficit of rental units affordable to all groups except those earning \$20,000 - \$35,000 (and a small surplus for those earning \$35,000 - \$50,000). In short, Coos County is mostly a \$500 to \$1,000 per month rental market (with some availability in the \$1,000 – 1,500 per month*



market).” The proposed Jordan Cove project will only exacerbate this issue. Temporary labor with specialized skills will come from out region. These employees typically are given incentives to work far from home, including high wages and generous per diem rates. When a temporary employee makes over \$4000/month in per diem, rental housing in the \$1000-2000/range is very affordable. The rental market for locals will be adversely affected by this influx of high paid temporary employees.

- FERC must deny this applicant as the adverse impacts to our community will be longterm. The DEIS does not identify where the proposed project will get the water needed to operate the terminal, nor the temporary man camp. *CITY OF NORTH BEND COMPREHENSIVE PLAN PLAN PROVISIONS AND POLICIES UPDATED AND CODIFIED JANUARY 2019: P 22. Article 4.3.100 – Problems and Planning Issues 1. Housing costs are generally increasing. Many people are not able to afford conventional housing types. More low and moderate-income housing types need to be provided for both owners and renters. P 24. Article 4.6.100 – Policies 1. Recognizing the difficulty for low-income groups to acquire adequate housing, the City shall promote the availability of lower-cost housing by advocating the interests of the North Bend City Housing Authority. P 36 Article 6.3.100 – Problems and Planning Issues 2. There is a possibility that industries that use large amounts of water may locate in North Bend. This may result in a need for additional water sources and storage.*
- *DEIS 4-591: Jordan Cove proposes to build a workforce housing facility at the South Dunes site to address concern that demand for rental housing by construction workers will have a negative impact on the availability and cost of rental housing for local residents.* Nowhere in the DEIS are statements requiring any temporary employees to actually stay in this “man camp”. With a generous per diem rate, why would an employee stay in what is essentially a glorified trailer park, when that employee can rent a three bedroom, two bath, house for less than half the monthly per diem rate.
- FERC must deny the applicant as the provisions for dealing with the expected increase in crime and impacts to social services are inadequate. Police officers in North Dakota attributed an increase in domestic violence calls to housing shortages and cramped living quarters associated with the influx of temporary labor.
- Until FERC and Jordan Cove defines “temporarily” this applicant must be denied. How many years of impact is considered temporary? Once the

proposed workforce is no longer needed, how long does the ripple affect of higher rents, impacts to emergency services and displaced cost burdened renters linger in the community? As the tide goes out from the exodus of the Man Camp impacts, what will the impacts be to housing for lower income, minimum wage workers in the county?

## **2. Recreation and Tourism**

- The economic feasibility study that supports the notion that the proposed project will be an economic white knight riding to the rescue of a failing local economy is based on data from 2012. The local economy has diversified and grown since then. FERC must demand a new, third party, peer reviewed economic feasibility study.
- The Coos Bay Area is a destination point for recreational activities in general and surfing in particular due in no small part to the lack of large, polluting industrial projects in the area. In 2017, National Geographic listed this area in their top twenty surfing locations. How will offshore disposal sites affect wave patterns and surfer safety at our popular surfing areas? How will the channel modification project related to this project affect a prime surfing location adjacent to Dredge Site 1 (404 COMPLETENESS RESPONSE 2018-03: ATTACHMENT B, Drawing 1).
- Dungeness crab fishing can yield up to \$100 million in income to the Oregon economy. Coos Bay provides important opportunities for both recreational and commercial crabbing. Crabbing in Coos Bay is undertaken during high tide, the only time LNG carriers can transit the channel with sufficient water under keel. Generally bay crab fishing has less than a two hour window and requires the crabber to be in the vicinity to check the rings frequently. A 30-minute interruption caused by a transiting LNG carrier during the peak period of fishing activity having a 2 hour feasible time window centered over high tide can readily and reasonably be characterized as a major disruption of one of the most important (and valuable) recreational uses of the Coos Estuary.
- DEIS 4-591 *“Additionally, during peak construction worker demand, tourists would likely be displaced, particularly during summer weekends”*. The local economy depends on tourist dollars, especially during the summer. Any displacement of the critical influx of tourists to the area may very well be the line between business failure and success. Many local business would not be able to survive with three summers of “displaced tourists”.

## **C. The propose project does not meet public need or benefit**

1. The applicant’s economic study is outdated. Recent economic analysis indicates the project is economically unlikely to succeed, as it is more expensive than other comparable projects and has a locational and



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operational disadvantage, particularly after the shift away from using electricity to freeze the gas for shipping. See recent article with economic analysis:

**[https://www.gjsentinel.com/news/western\\_colorado/energy-consultant-doubts-jordan-cove-economics/article\\_6124f150-84f5-11e9-870b-20677ce85d90.html](https://www.gjsentinel.com/news/western_colorado/energy-consultant-doubts-jordan-cove-economics/article_6124f150-84f5-11e9-870b-20677ce85d90.html)**

2. Any reduction in greenhouse gas emissions is likely to be offset by losses from methane tank leakage. See recent article on LNG tank leakage and danger Jenny Mandel et al., Leaks Threaten Safety – and Success – of America’s Top Natural Gas Exporter, Houston Chronicle (May 30, 2019) **<https://www.houstonchronicle.com/business/energy/article/Leaks-threaten-safety-and-success-of-13904931.php#photo-17570798>**.
3. FERC must deny the applicant with prejudice as there is little or no benefit to the American public. The current proponent of this project is foreign owned. Over 80% of the LNG product will originate from Canadian gas fields, and be shipped overseas to Asian markets. Please explain how this project will reflect the United States of America’s “national concern...” when this project is funded by foreign interests and is essentially a means to export Canadian LNG. Please define the important American resources that this project will protect and those which it will not.

In conclusion, FERC must deny this applicant, with prejudice. The proposed project will adversely affect the quality of life here on Oregon’s southern coast. Oregonians treasure the beauty and bounty that occur here, and which this proposed project will destroy.

Sincerely,

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