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Coos Bay OR 97420

August 27, 2019

Land Use Application #187-18-000153 – Jordan Cove Energy Project Navigation and Efficiency and Reliability of the Coos Bay Deep Draft Navigation Channel.

City of Coos Bay City Councilors,

Thank you for providing this opportunity for public testimony regarding your consideration of proposed amendments to the City's comprehensive plan and zoning map.

During my 25 years of residency in Coos county I have directed my professional engineering, consulting and contracting practices toward the support of responsible development, strategic growth and sustainable living on the Oregon coast. Through my engineering apprenticeship and term as the environmental manager for Weyerhaeuser Company's Containerboard plant and north spit land holdings I became intimately familiar with the critical role of safe and reliable transportation as well as the balance of managing an industrial facility for economic gain while honoring local, state and federal environmental regulations and plans. After opening my private practice in 1999 I enjoyed providing project management services to the Coos Bay North Bend Waterboard for the environmental permitting and compliance elements of our communities' public water supply expansion project, a 15 year process entailing federal nexus permitting, objective substantiation of net benefits to ecological, social and economic systems and considerable public investment in the restoration of estuarine lands in this, our, watershed.

It is with this lens of experience and familiarity that I urge you to deny the applicant's proposed amendments to our city's comprehensive plan and zoning map. The application fails to demonstrate that the exemption from our statewide planning goals would result in a net positive way to the public interest as well as the need for the proposed exception to meet the City's Goal 9 of economic development obligations.

The application fails to provide objective substantiation of a net positive benefit to the public interest.

This evening's agenda timing of a consent calendar approval acknowledging the direct financial infusion to the City should the Jordan Cove Energy Project come to pass underscores the applicant's reliance on a single dimensional public benefit analysis. The application fails to address the economic detriments to the public interest of the proposed dredging which include disturbances to our bay and estuarine ecosystems which directly support active recreational and commercial fisheries, our millions of dollars of public investments in estuarine restoration along these shores, regular disturbances in recreational access, sound and view shed impacts to our ecotourism and the long term economic liabilities of maintenance dredging

activities . These economic detriments are complimented by social and environmental impacts ranging from disrupted view sheds along our bay line and noise pollution to the decimation of an additional 3 acres of habitat.

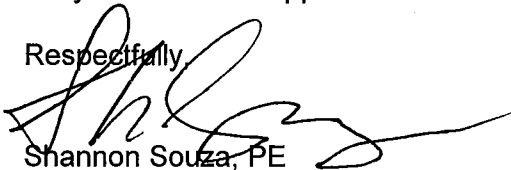
The application fails to demonstrate a need for the proposed use or activity based on one or more of the requirements of Goals 3 to 19.

The requested exception is not *required* in order to meet the City's Goal 9 to provide adequate opportunities for a variety of economic activities vital to the health, welfare, and prosperity of our citizens.

I applaud the city for its endeavors in down town revitalization, support of public shoreline access, diversification of our economy and the support of existing and emerging economies currently throttled by our housing shortage. I am further heartened by the pursuit of additional economic developments which would better utilize the international port of Coos Bay's Foreign Trade Zone as well as the value added potential of our resident skills in industrial hemp processing, Cross Laminated Timber export, flat pack and tiny home manufacturing. I look forward to attending the U.S. Department of the Interior's Bureau of Ocean Energy Management Oregon Intergovernmental Renewable Energy Task Force meeting on September 27 at which the BOEM and the State of Oregon are engaging with the task force to begin offshore wind planning on southern Oregon – recognized as a highest value wind resource in the world and adjacent to the lucrative open renewable energy market of California. These are examples of activities that support economic development while upholding the health, welfare and prosperity of our citizens without need of exemption from other statewide planning goals.

Again, I thank you for your time and consideration of this contentious matter and urge you to deny this land use application.

Respectfully,

A handwritten signature in black ink, appearing to read 'Shannon Souza', is written over the word 'Respectfully'.

Shannon Souza, PE