

## HEARLEY Henry O

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**From:** Carol Sanders <writeronthebay@gmail.com>  
**Sent:** August 25, 2019 5:44 PM  
**To:** HEARLEY Henry O  
**Subject:** Coos Bay Dredging NRI 4

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

August 25, 2019

Dear City Council of Coos Bay,

Please concur with the recommendation of the Lane Council of Governments report and deny issuing Jordan Cove Energy Project's permit under Coos Bay file No. 187-18-000153-PLNG-01 (Channel Navigation Alteration in Coos Bay) for NRI 4. These are some reasons:

- Dungeness crab and salmon species native to the bay will be drastically harmed by the proposed dredging. Recreational and commercial fishing, clamming and crabbing will be decimated by direct impacts and loss of habitat.
- JCEP indicated a 1 – 2% increase in LNG export from the channel modifications proposed. This low gain is not enough to justify the devastation to the bay's ecosystem and the public's right to enjoy recreation on the bay caused by the planned dredging.
- "Improved navigational ability" is what JCEP defined as being in the Public Interest to be achieved by the proposed modifications. However, the United States Coast Guard issued a Water Suitability Report stating that the bay is suitable as it is for LNG tankers, making NRI 4 unnecessary. JCEP's draft EIS to FERC also states this.
- A 401 Water Quality Permit was denied to JCEP by the Oregon Department of Environmental Quality because turbidity standards will be exceeded by JCEP's proposed dredging. JCEP can apply again for this permit, therefore the city of Coos Bay should wait until JCEP has reapplied and been issued this necessary permit to decide on NRI 4.
- According to the Coos Bay Estuary Management Plan Policy #5, the public has a Public Trust Right to use the navigable water of Coos Bay for commercial, fishing and recreational activities.
- The public's access to crabbing, fishing and clamming, boating, and other water activities will be limited by LNG ships using NRI 4.
- Recreational and commercial harvests will be severely lessened by the initial and continuing dredging required to maintain NRI 4.

- NRI 4 is located in the 52 Natural Aquatic Zone where dredging is forbidden. “Compatibility with adjacent uses” is mandated by State Planning Goal 16. The part of the 52 Natural Aquatic Zone that is not dredged will be severely affected by the proposed dredging on the east side of NRI 4 by turbidity and increased sediment with a resulting loss of productivity.
- Dredging is permitted only to “maintain adequate depth to permit continuation of present navigation,” according to State Planning Goals and OAR-660-004-0022. NRI 4 is a drastic change to a Federal Navigation Channel.

For these reasons, please do not issue the permit for the proposed NRI 4.

Very Sincerely,

Carol and Darrell Sanders  
664 S. Empire Blvd.  
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