



May 20, 2019

**To:** Ms. Chelsea Schnabel,  
Director  
City Of North Bend Planning Department  
PO Box B  
835 California Avenue  
North Bend, OR 97459

**Subject:** RESPONSE TO THE NARRATIVE FILED BY JORDAN COVE ENERGY PROJECT L.P. IN SUPPORT OF THE APPLICATIONS FOR AN ESTUARINE PERMIT AND A FLOODPLAIN DEVELOPMENT PERMIT

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.

We urge you to not approve this application as the action is premature given that the applicant has yet to receive determination of approval by any State or Federal regulatory agency. In fact, the State Division of State Lands, and State Department of Environmental Quality have both denied the applicants permit at this date. The City of North Bend just recently deferred a decision to ban single use plastic bags until the State makes a decision. To be consistent, the City should defer the applicants permit until such time as the State reaches a final decision regarding the JC/PGCP project.

The applicant states that the several “temporary” hard structures (dredge line, bridge, booster pumps etc) will be placed within the Coos Bay Estuary Management Plan zones 52-NA, 51-CA, 50-NA, 48-CA, and 48-CS. The applicant states in Section III of their permit, that essentially little or no adverse affects will be incurred due to this particular segment of the Jordan Cove, Pacific Gas Connector Pipeline project. We feel that the adverse impacts of the entire JC/PGCP project must be taken into consideration for any Public permit review process. The cumulative impacts by all the interconnected and interrelated aspects of the entire project must be considered in the County permit process.



In addition, the applicant gives conflicting messages regarding effects to eel grass habitat with the footprint of this piece of the entire JC/PCPG project. On page 6, Exhibit 5, the applicate states that eel grass would not be disturbed where as on page 13 of the “Before the Director” document, the applicant states that “in order to minimize impacts to eel grass...the pipeline will be elevated”. Until such conflicting and contradicting “findings” are rectified, we urge you to deny this permit. The applicant must daylight *all* the potential adverse affects of the entire JC/PGCP project for your Department to make an informed decision.

Sincerely,  
Sam Schwartz  
Chair  
Coos Bay Chapter Surfrider Foundation  
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