On Tuesday, July 23rd, the Oregon Department of Land Conservation and Development (DLCD) opened a 60-day public comment period for an important permit for Jordan Cove LNG known as the “Coastal Zone Management Act Consistency Review.”

Under the Coastal Zone Management Act (“CZMA”), the state of Oregon has the authority to review projects that require federal licenses or permits that might impact land, water use, or natural resources in the coastal zone to determine whether or not they are consistent with the Oregon Coastal Management Plan. This process effectively gives the state a voice on federal permit or licensing decisions for projects within the coastal zone.

A CZMA certification denial has stopped other projects across the country. For example, in 2008, the State of New York used the authority of the Coastal Zone Management Act to deny a fracked gas terminal proposed in the Long Island Sound, stating that the project was not consistent with New York’s coastal zone management policy and that the region could find other, more responsible ways to ensure sufficient energy supplies.

<table>
<thead>
<tr>
<th>What can you do?</th>
<th>Write a comment to DLCD to let them know why you are concerned about the Jordan Cove project and Pacific Connector pipeline and why it is not consistent with Oregon’s Coastal Zone Management Plan.</th>
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<tr>
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<td>The following is a guide to help you draft and submit comments or testimony that will help stop Jordan Cove LNG!</td>
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**Coastal Zone Management Act Comment Writing Guide**

**What is the permit that I’m commenting on?**

<table>
<thead>
<tr>
<th>Permit</th>
<th>Coastal Zone Management Act -- Federal Consistency Review</th>
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</thead>
<tbody>
<tr>
<td>Agency</td>
<td>Oregon Department of Land Development and Conservation (DLCD)</td>
</tr>
<tr>
<td>What is the agency reviewing?</td>
<td>DLCD is reviewing two federal permits required for the project that might impact the state of Oregon’s coastal uses or resources to determine if the proposed activities are consistent with the enforceable policies of Oregon’s Coastal Management Plan.</td>
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The federal permits that DLCD is reviewing are: 1) the U.S. Army Corps Clean Water Act 404/Section 10 permit and 2) the Federal Energy Regulatory Commission energy siting certificate.

The enforceable policies of Oregon’s Coastal Management Plan include:

1) Statewide land use planning goals;
2) Land use regulations; and
Selected state authorities (for example, regulations from state agencies including Oregon Department of Environmental Quality, Oregon Department of State Lands, and Oregon Department of Fish and Wildlife).

**Deadline**
All comments are due on Saturday, September 21, 2019

**Decision**
DLCD must make a decision by October 12, 2019.

**Where do I send my comments?**

<table>
<thead>
<tr>
<th>Email</th>
<th>To: DLCD Director Jim Rue at <a href="mailto:coast.permits@state.or.us">coast.permits@state.or.us</a></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Subject line:</strong> Public Comment on Jordan Cove LNG Federal Consistency Review</td>
</tr>
<tr>
<td>Mail</td>
<td>Coastal Zone Management Program-DLCD 634 Capitol Street NE, Suite 150, Salem, OR 97301</td>
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**What is a “federal consistency” review?**

Under the Coastal Zone Management Act, the Oregon Department of Land Conservation and Development has the authority to review projects that require federal permits or licenses within the coastal zone to ensure they are consistent with the enforceable policies laid out in Oregon’s Coastal Zone Management Plan. Enforceable policies include comprehensive plans and land use regulations, state statutes, and statewide planning goals. (You can access the list of enforceable policies here: [www.oregon.gov/LCD/OCMP/Pages/Notice-Comment.aspx#FCPublicNotices](http://www.oregon.gov/LCD/OCMP/Pages/Notice-Comment.aspx#FCPublicNotices))

DLCD is reviewing two major federal permits/licenses needed for the proposed project: the Army Corps Section 404/Section 10 permit and the Federal Energy Regulatory Commission's energy siting certificate.


**What should I write in my comment?**

Tell the Department of Land Conservation and Development (DLCD) that the project is NOT consistent with the state of Oregon's Coastal Management Program.

a. Pembina has failed to demonstrate that the Jordan Cove LNG project is consistent with the enforceable policies of Oregon’s Coastal Management Program.

i. The project is not consistent with Statewide Planning Goals:
   - Statewide Planning Goal 6: “[t]o maintain and improve the quality of the air, water and land resources of the state.”
● Statewide Planning Goal 7 requires land use planning to reduce risk to people and property from natural hazards, such as floods, wildfires, tsunamis, landslides, and earthquakes.

ii. The project is not consistent with land use regulations:
   ● Pembina is missing many of the local land use permits required for the project.

iii. The project is not consistent with state authorities:
   ● The state of Oregon denied the Clean Water Act Section 401 State Water Quality Certification in May 2019 because Pembina failed to demonstrate that the project complied with state water quality standards.

b. The Jordan Cove Energy Project will cause irreparable harm Oregon’s coastal communities, natural resources and local economy, and there is no public need for the project.

Get specific! Include your concerns and specific ways you may personally be impacted.

Why should DLCD object to the Coastal Zone Management Act certification?

The project is NOT consistent with the state of Oregon’s Coastal Management Program.

● Pembina has failed to obtain land use permits for the project in Coos Bay.

● Oregon Department of Environmental Quality denied the Clean Water Act Section 401 State Water Quality Certification in May 2019 because Pembina failed to demonstrate that the project complied with state water quality standards.

How does the Jordan Cove pipeline and terminal impact Oregon’s Coastal Zone?

● Jordan Cove LNG would be one of the largest dredging projects in Oregon history, fundamentally altering the tidal currents, cultural resources, and the aquatic resources of the bay necessary to support commercial and recreational crabbing, fishing and shellfish industries.

● The LNG export terminal would be constructed in an area at risk for a high magnitude earthquake and Tsunami. The Coos Bay area is located near the Cascadia Subduction Zone off the Oregon Coast. Scientists estimate that there is a 40 percent chance of a major earthquake in the Coos Bay region during the next 50 years.1 Over 16,000 people near the terminal would be in a “Hazardous Burn Zone.” The potential health and safety

impacts to the LNG Terminal resulting from an earthquake or Tsunami have not been properly assessed.

- **The project would impact endangered species including marbled murrelets and salmon.**

- **The export terminal and increased fracking would make climate change worse.** The terminal alone would become the largest climate polluter in Oregon by 2020. The Coast of Oregon faces unique challenges as a result of climate change, such as sea Level rise, that Jordan Cove has not analyzed.

- **Nearly 1,800 temporary residents from outside our local communities** will descend on coastal and pipeline route towns during the construction phase. This will impact housing availability in Southern Oregon. Corporate CEOs promise that dozens of jobs will remain after construction, but history has proven that such promises are rarely kept. Temporary worker camps, sometimes referred as “Man Camps”, would be built along the pipeline route and at the terminal location to house out of state temporary workers. Reports show a direct correlation between these encampments and violence against women, especially impacting indigenous communities.

- **Traditional tribal territories, cultural resources, and burial grounds are threatened by the pipeline.** The Klamath, Siletz, Karuk, Yurok, and Tolowa Dee-ni’ Tribes have all come out in strong opposition to the pipeline.

- **Farmer and landowner rights will be trampled.** Hundreds of private landowners will be impacted along the pipeline route and many will be threatened with eminent domain if they do not settle for permanent use of their land. The use of eminent domain could have an economic impact on southern Oregon economies.

- **Farms, fishing, and recreation businesses will suffer** as the project impacts waterways nearly 500 times damaging sensitive salmon and steelhead habitat, and hurting existing jobs and businesses.