

DRAFT

To (FERC):

The Pacific Fishery Management Council is concerned that the Jordan Cove liquefied natural gas (LNG) Project and Pacific Connector Pipeline Project proposed for southern Oregon could have profoundly negative impacts on Council-managed fisheries, including Chinook salmon, Oregon coast coho salmon, sardine, Pacific sand dabs, English sole, starry flounder, lingcod, rockfishes, as well as their prey.

The Council notes that FERC's draft environmental impact statement released on March 29 does not include analyses of how the proposed actions would affect Council-managed species and their habitats. As such, the Council does not have sufficient information to comment, pursuant to the Magnuson-Stevens Fishery Conservation and Management Act, on specific actions at this time. The Council therefore requests that FERC provide the Essential Fish Habitat Assessment to the Council coincident with the delivery to National Marine Fisheries Service.

(Add boilerplate about Council role).

A cursory review of materials suggests that impacts on Council-managed fisheries could result from dredging, construction of the terminal slip and access channel, development and maintenance of pipeline stream crossings and on slopes above streams, in-water blasting and new roads for pipeline construction, and other activities associated with the project.

Potential impacts include:

- Loss of intertidal and shallow subtidal habitats due to the dredging of navigation and access channels, and slip construction
- Loss of eelgrass beds
- Changes in hydrology, salinity intrusion, water temperature, and turbidity
- Removal of riparian vegetation near streams, wetlands, and waterways within the pipeline corridor, with associated impacts on nutrient input, shade, sediment load, turbidity, and erosion
- Loss of spawning habitat for salmonids
- Erosion and sediment loading in streams from pipeline construction on steep slopes

In addition, we are concerned that fishing and port delivery activities associated with Coos Bay--one of the busiest fishing ports on the West Coast--may be impeded or halted in the security zone around LNG carrier vessels. This could lead to substantial impacts to Council-managed fisheries due to loss of fishing opportunity, loss of productive habitats, and impacts to prey species.

To summarize, we believe this project could alter estuarine and freshwater habitats with profound and lasting impacts on Council-managed species and their prey. We reiterate our request that FERC provide the Essential Fish Habitat Assessment to the Council coincident with the delivery to National Marine Fisheries Service.

PFMC
06/20/19