



Leagues of Women Voters of Coos County, Umpqua Valley, Rogue Valley, and Klamath County

January 27, 2020

Governor Kate Brown
Office of the Governor
900 Court Street NE, Suite 254
Salem, OR 97301-4047

Dear Governor Brown:

We, the four undersigned local Leagues of Women Voters (LWV), applaud and support your commitment to addressing the most urgent issues facing Oregon, the nation, and the planet. We are in a climate crisis, with serious consequences already clearly evident and more effects on the way. In the past months, you have reasserted your resolve to accomplish *greenhouse gas emissions reduction goals*, including by getting in place an effective cap and trade mechanism. Your recently adopted Oregon Ocean Acidification and Hypoxia Action Plan will strengthen our regional and international partnerships to combat Ocean Acidification and protect Oregon’s ocean and coastal ecosystems and economy. You launched initiatives to confront two additional pressing consequences of climate change—degradation and reduction of our *water* resources and increasingly more destructive and costly wildfires. Your commitment to the Environmental Justice Task Force emphasizes the fact that environmental and health hazards often disproportionately affect the environment of underrepresented vulnerable citizens and indigenous people.

We write this letter out of our deep conviction that the proposed Jordan Cove Energy Project (JCEP) is all wrong for Oregon. If allowed to go forward, it will not only single-handedly jeopardize southern Oregon, but will also thwart your efforts to preserve and protect Oregon, its citizens and taxpayers, and the future you envision. This project by itself would make the essential goals Oregon needs to achieve to create a livable future far more difficult than they currently are. Adding to our sense of urgency is the growing intensity with which the current federal administration is pursuing *their* priorities to ramp up fossil fuel infrastructure at the same time as they take steps to cripple state, national, and global efforts to address climate change.

We have expressed in comments to relevant agencies our numerous concerns about the JCEP, but in this letter we select six specific arenas where we see the conflict playing out especially intensely in Oregon. These six relate to goals you and we support for a positive future and outline the antithetical impacts installation and operation of the JCEP would perpetrate:

1. Oregon's emissions reduction goals are designed to help stop climate change with strong leadership and action. We applaud the fact that you have made those goals a high priority, but they would most certainly be thwarted if the JCEP is built and becomes operational.
2. Oregon's Coastal watersheds, estuaries and shorelines--assets held in trust for all citizens—are threatened by JCEP due to its direct and cumulative impacts that promise to be greater than any other project in the state.
3. If the JCEP goes forward, it will substantially jeopardize our ability to achieve the foundational goal of Oregon's 100 Year Water Vision to confront future challenges to ensuring that we have adequate quantities of clean water in the face of climate change.
4. You have initiated several actions to pursue aggressive wildfire reduction, but both JCEP construction and operations would introduce whole new sets of triggers for wildfire beyond what we face today, taking us in the totally wrong direction in another way.
5. Oregon's commitment to environmental justice and human health and safety would be thwarted by the risks associated with the installation of the JCEP pipeline, gas processing facility, compressor station, and shipping activities.
6. The size, complexity, and legacy of the JCEP have combined to jeopardize the effective application of Oregon's Statewide Planning Goals to make a meaningful assessment and evaluation of the impact of the project on the southern coastal region and Coos Bay Estuary.

Detailed Discussion of those Concerns

- 1. Oregon's emissions reduction goals are designed to help stop climate change with strong leadership and action. We applaud the fact that you have made those goals a high priority, but they would most certainly be thwarted if the JCEP is built and becomes operational.**

The LWV of the US has taken the following position on climate change:

The League believes that climate change is a serious threat facing our nation and planet. The League believes that an interrelated approach to combating climate change—including through energy conservation, air pollution controls, building resilience, and promotion of renewable resources—is necessary to protect public health and defend the overall integrity of the global ecosystem. The League supports climate goals and policies that are consistent with the best available climate science and that will ensure a stable climate system for future generations. Individuals, communities, and governments must continue to address this issue, *while considering the ramifications of their decision, at all levels—local, state, regional, national, and global.*

A majority of Oregonians support action to address climate change and you and the legislature are committed to that end, including during the current session by continuing to emphasize the need for a cap and trade bill. But the Jordan Cove Liquefied Natural Gas Terminal (JCLNG) and Pacific Connector Gas Pipeline (PCGP), if built, would drag us backwards from where we are now—admittedly falling short of meeting emissions reductions goals which current science indicates may even be insufficient—and wipe out the gains we have made by retiring the Boardman coal facility. We will be watching closely for language in whatever bills are considered this session to ensure JCEP or a project like it would be held to

paying their fair share. But even with such legislation, Oregon cannot accept the enormous *new* emissions JCEP would generate if we are to meet even our existing goals.

Science-based decisions on all matters related to achieving a livable future are essential, but when a project of this nature is proposed, regulators and the public face a significant challenge to obtain adequate information, including about potential or likely climate change-related impacts. None of the over 60 permits and approvals requested by JCEP to construct and operate the project has provided an adequate assessment of the project's impact on climate change. There are several reasons for this having to do with multiple state and local permitting processes, but a major reason is that the Federal Energy Regulatory Commission (FERC) in the JCEP FEIS denied any responsibility to discuss these matters. This is longstanding practice and Oregon state agencies and many others argued in their comments on the DEIS that the courts have determined disclosure and discussion of potential and cumulative impacts are, in fact, required by the National Environmental Policy Act (NEPA). But rather than FERC being compelled to comply, the federal Administration has determined to regulate away the issue. The January 10, 2020 publication of proposed CEQ "update" for the National Environmental Policy Act (NEPA) includes as a major component turning current regulations and CEQ's own guidance on consideration of GHG emissions and effects of climate change on their heads, practically precluding those issues and cumulative impacts from the environmental impacts discussion.¹ The League is firmly committed to resisting federal action to obscure cumulative impacts or the realities of the GHG impacts of individual proposed projects on either state emissions reduction goals or the overall global climate emergency. We urge you to be prepared to stand firm. We can anticipate federal push-back on states that accept their responsibilities "to protect public health and [Oregon's] environmental and natural resources," as you committed to do in HB 2250. "Cooperative federalism" is being frayed and states will need to utilize whatever legal tools they have at their disposal.

But despite FERC's protestations about the irrelevance of GHG emissions information in the FEIS, there is well documented information available to show that, if the JCEP were to be built, Oregon's emissions goals would be thwarted. According to analysis by Oil Change International (OCI), by 2050, when Oregon is slated to have reduced emissions to 75% below 1990 levels, *JCEP's in-state emissions would amount to 16% of the total without providing a single kilowatt hour of energy to any individual, family, business, or other consumer in Oregon.*² OCI used JCEP's and other information to try to answer the critical question of how JCEP would impact Oregon's climate change goals. Here is some of what they found:

- OCI estimates the total lifecycle emissions of JCEP—carbon and methane emissions from extracting, piping, processing, transporting, and burning the intended volume of gas—to be over 36.8 million metric tons (MMT) of carbon dioxide equivalent (CO₂e) per year, the equivalent of

¹ CEQ, "Final Guidance for Federal Departments and Agencies on Consideration of Green House Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews," 81 Federal Register 51,866 (August 5, 2016) cited in "Comment of Attorneys General of California, Illinois, Maryland, Massachusetts, New Jersey, New York, Oregon Vermont, and Washington, and the Secretary of the Commonwealth of Pennsylvania Department of Environmental Protection," August 20, 2018.

² Oil Change International, "Jordan Cove LNG and Pacific Connector Pipeline Greenhouse Gas Emissions Briefing," http://priceofoil.org/content/uploads/2018/01/JCEP_GHG_Final-Screen.pdf.

7.9 million passenger vehicles and 15.4 times the 2016 emissions of the Boardman coal-fired power plant that Oregon has gone to great lengths to retire in 2020.

- Its total in-state annual emissions—from the LNG terminal, compressor station, and leakage along the pipeline route—would be over 2.2 MMT, making it by 2025 the largest single source of climate pollution in the state of Oregon and cancelling out savings from the Boardman closure.
- The supercooling of natural gas for liquefaction at the Coos Bay LNG Terminal alone would result in 1.8 MMT of CO₂e per year.
- JCEP is scheduled to begin operations in 2025 and have a life of 40+ years. That means it would still be operating and could well be generating 2.2 MMT of CO₂e per year for at least another decade after Oregon's 2050 milestone.

Physicians for Social Responsibility just released a report expounding on the health risks of fossil fuel infrastructure development in general and LNG operations in particular. Author Surapeneni summarizes in the press release, "With LNG projects, we are locking ourselves into fossil fuel infrastructure that will heat up our planet and impose a human health cost."³

The Oregon Ocean Acidification and Hypoxia (OAH) Action Plan produced recommendations and guidance for the State of Oregon to slow OAH impacts and adapt to the changes we are already seeing in that arena. In addition to their goal of developing effective and efficient ways to reduce excess CO₂ and OAH stressors, they prioritized research actions to include developing strategies to restore, protect, and sustain nursery habitat for valuable shellfish, Submerged Aquatic Vegetation (SAV), and native shellfish. They also prioritized Oregon's water quality, life history stages of OAH vulnerable marine species, and economic resilience in coastal communities and marine industries. The Oregon Department of Fish and Wildlife has just announced they will develop a Climate and Ocean Change Policy in response to their concerns. Each of these is threatened by the proposed development of the JCEP.

We appreciate your and many other Governors' continued commitment to address climate change even as the current national Administration continues to move forward towards withdrawing the U.S. from the Paris Climate Accord.⁴ We understand that a cornerstone of Oregon's efforts is our participation in the Pacific Coast Collaborative. But safeguarding Oregon from the intrusion of fossil fuel infrastructure into our already precarious hopes to reduce harmful emissions must be elevated to a top priority. Its enormous detrimental impact—to no benefit whatsoever in meeting Oregon's energy needs—cannot be left out of the equation.

³ Laalitha Surapeneni, Press release for her report, "Climate and Health Risks of Liquefied Natural Gas," November 2019, <https://www.commondreams.org/newswire/2019/11/26/physicians-social-responsibility-releases-report-climate-and-health-risks>. The report is found at <https://www.psr.org/wp-content/uploads/2019/11/LNG-WHITE-PAPER-11262019.pdf>.

⁴ Governor Kate Brown tweet, October 23, 2019, https://twitter.com/OregonGovBrown/status/1187105501898608640?ref_src=twsrc%5Etfw%7Ctwcamp%5Eembeddedtimeline%7Ctwterm%5Eprofile%3AOregonGovBrown%7Ctwcon%5Etimelinechrome&ref_url=https%3A%2F%2Fwww.oregon.gov%2Fgov%2Fpages%2Findex.aspx.

2. Oregon’s Coastal watersheds, estuaries and shorelines--assets held in trust for all citizens—are threatened by JCEP due to its direct and cumulative impacts that promise to be greater than any other project in the state.

We believe that approving state permits related to Oregon’s water quality standards to allow t JCEP in Oregon would violate the public trust doctrine that prohibits the state from taking actions to impede or substantially impair the public right to use the waters for navigation, fishing, commerce, and recreation. We have documented in numerous comments to appropriate state (and federal) agencies that direct and indirect effects from the construction of the PCGP pipeline, the JCLNG liquefaction facility, and its associated operations would threaten the ecological functions of the largest estuary in Oregon and adversely affect navigation, fishing, commerce, and recreation.⁵ The removal of 5.7 million cubic yards of material to create the proposed slip and access channel for ship access would increase the likelihood of significant subsidence and affect the complex hydrology of the spit. The proposed changes in the shoreline and subtidal substrates due to dredging of the channel for access, plus the removal of an additional 584,300 cubic yards from four areas alongside the Federal Navigation Channel would have a profound influence on the circulation of water in the area, the flow of nutrients, and habitat use by aquatic biota, much of it adverse. Moreover, the Horizontal Directional Drilling (HDD) proposed to route the PCGP under the Coos estuary is well known to be a risky pipeline construction activity. At a minimum, it would result in substantial disturbance at the four points of operation on the shoreline. At worst, it may not work at all, leaving destruction from the failed attempt in its wake.

Despite claims by FERC staff in the FEIS, both the construction phase and the operation of ships transporting the LNG would encroach upon the public’s rights to use the navigable waters in Coos Bay and harm the fisheries sector of the local economy. Fishing activity in the bay occurs throughout the year for various target species. The recreational fishing industry in Oregon has broadscale economic impact and is tied to trips in and out of the bay region. The recreational crab fishery would be among those most vulnerable, as it would be adversely affected by the habitat alterations from construction and dredging and frequent tanker traffic in the navigation zone of the estuary. In addition to clams and crabs, other invertebrates that are harvested commercially and recreationally in the bay include oysters, bay mussels, ghost shrimp, kelp worms, and mud shrimp. Each of these species has a different reproductive cycle and uses different aspects of the habitat. All would be harmed. All would be harmed and the associated economic sector along with them.

JCEP would also impact the coastal ecosystems of Oregon that provide tremendous economic and cultural prosperity for our citizens. According to Jason Miner, your Oregon Natural Resources Policy Manager, this prosperity includes the \$2 billion tourism and recreation industries and the \$320 million fishing industry that supports over 25,000 jobs. These are renewable economic resources, and tourism and recreational uses are increasing in economic value each year. On the Oregon Coast, outdoor recreation accounted for about 10 percent of all visitor spending in 2017, amounting to about \$200 million. In 2017, visitors to Coos County spent more than \$258.1 million on hotel stays, food and beverages, shopping, recreation, fuel, and more. Even more importantly, visitor spending in Coos County supports more than 3,300 jobs, more jobs than the Bay Area Hospital and forestry/wood

⁵ For example, our comments on JCEP’s CWA section 401 permit application, http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20191219-5010; and CWA 404, 408, 401 permit applications, http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20191219-5018.

products industry combined. Travel generates \$1.5 million in local tax revenues. Visitor spending in Oregon in 2017 divided by the total 4.1 million population of Oregon is \$2,850. Coos County's contribution to that is much greater—for every resident in Coos County, approximately 63,310, visitors to the county spent \$4,076 per resident.⁶

The Oregon Coastal Zone Management Association (OCZMA) writes:

Fisheries also provide part of the overall ambience folks want to experience when visiting the Oregon coast or opting to live there. They help attract artists, writers and others, including a growing number of retirees, who in turn make their own contributions to an ever-changing diverse economy and culture. Travelers spend time watching and photographing the fishing fleets, and visitors often show up at the coast seeking fresh, locally caught seafood.⁷

JCEP would disrupt and diminish all of the above activities. In exchange for these stable, permanent jobs, JCEP offers temporary construction jobs that may well go to a significant degree or even largely to workers from out of state.

The Pacific Fishery Management Council (PFMC) aptly summarized a number of adverse direct and indirect impacts on coastal fisheries that can be expected from the proposed JCEP in their DEIS comment to the FERC on July 1, 2019.⁸ Their concerns included a) loss of intertidal and shallow subtidal habitats in Coos Bay due to dredging of navigation and access channels and slip construction; b) loss of eelgrass beds, an essential fish habitat; c) changes in hydrology salinity intrusion, water temperature, and turbidity; d) removal of riparian vegetation near streams, wetlands and waterways within the pipeline corridor, and associated impacts on nutrient input, shade, sediment load, turbidity, and erosion; e) loss of spawning and rearing habitat for salmonids; and f) erosion and sediment loading in streams from pipeline construction on steep slopes and potential landslides.

Further disruption would stem from measures to guard against terrorism as the storage facility and loaded tankers could potentially draw attack on the west coast. The U.S. Coast Guard typically requires exclusion zones of up to 500 meters surrounding LNG tankers transiting and while at dock for safety and national security purposes. The Oregon Department of Fish and Wildlife (ODFW) and regional fisheries agencies such as the PFMC and Oregon Dungeness Crab Commission have pointed out the access and economic conflicts this practice would create with all other users, including the shellfish (crabbing/clamming) and finfish (rockfish, salmon, steelhead) fisheries in Coos Bay. Security requirements alone would stifle the contribution of fisheries to the economics of Coos County and Southwest Oregon and dramatically reduce the economic impact of recreational opportunities and the local businesses that depend on them.

3. If the JCEP goes forward, it will substantially jeopardize our ability to achieve the foundational goal of Oregon's 100 Year Water Vision to confront future challenges to ensuring that we have adequate quantities of clean water in the face of climate change.

⁶ Nicolas, A. Johnson, "Visitor spending data released by Travel Oregon," *The World*, July 16, 2018; Runyan and Associates 2019, "Oregon Travel Impacts Statewide Estimates 1992 – 2018," Oregon Tourism Commission.

⁷ Terry Dillman, "Oregon Ports Stimulate Coastal, State Economy," *Fisherman's News*, May 1, 2013.

⁸ http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20190701-5292.

The League of Women Voters of Oregon “. . . opposes degradation of all of Oregon’s surface and ground water” and,

. . . recognizes that conservation strategies for surface and ground water, including but not limited to incentives, regulations and rationing in emergency situations, are needed to meet future demand. Individuals, agriculture, municipalities, forestry and industry should be encouraged to develop practices to reduce water usage and minimize pollution. Support should be provided for upgrading and maintaining the equipment necessary for water conservation. The League supports the need to build resiliency and innovation into water planning in order to address climate change impacts.

League members participated in 100 Year Water Vision meetings last fall in support of this important statewide effort to ensure adequate water in the future. However, we noted with some concern that there was little acknowledgment in the draft vision statement of the potential threats to either our water quality or quantity posed by the proposed JCEP. Also not addressed adequately in our view were current efforts by the federal Administration through proposed regulatory rewrites to diminish state and tribal ability to protect their own water quality authorized by Congress in section 401 of the Clean Water Act (CWA). As you know and conveyed in your comment on the latter rule changes proposed by the Environmental Protection Agency (EPA), the impetus for this illegal attempt to usurp state and tribal rights is precisely to prevent those entities from protecting their water and water users from water-degrading construction and operations by projects like JCEP. The LWVOR also commented to the EPA, raising similar concerns.⁹ We have no crystal ball, but we fully expect the EPA to push ahead with implementation of these stunningly audacious proposed regulations for Section 401, just as they have implemented regulations weakening protections for Waters of the US, even though their Science Advisory Board counseled against both actions and court challenges are certain to be mounted.¹⁰

States must be able to continue to exercise the protective authority granted to them by Congress in the CWA. The Oregon Department of Environmental Quality (DEQ) has tried for years to obtain adequate information from JCEP (under the ownership of both Pembina and its predecessor, Veresen) to definitively determine whether the JCEP would, in fact, avoid violating Oregon’s Water Quality Standards. These requests have been met with limited success and, in some cases, unwarranted charges of obstructionism.¹¹ We submitted substantive comments on JCEP’s initial section 401 application and therein outlined many of the same informational deficiencies that DEQ so appropriately detailed in its denial.¹² For some time, JCEP had indicated they would reapply in January 2020—recently they revealed they would wait until February or perhaps beyond. We support the careful and thoughtful approach to the permitting process by the DEQ staff. How EPA’s proposed rule changes to CWA section 401 will play

⁹ We participated in the drafting of that comment that can be found at http://lwvor.org/wp-content/uploads/2019/10/LWVOR-to-EPA_-401-regs_2019-10-09.pdf.

¹⁰ EPA Science Advisory Board (SAB) Draft Commentary (10/16/19) to Andrew R. Wheeler U.S. Environmental Protection Agency.

¹¹ For example, by our observation, DEQ and various other state agencies were criticized for diligent performance of their permitting responsibilities during the September 16, 2019 meeting of the Senate Interim Committee on Environment and Natural Resources, as well as the January 16, 2020 meeting of the South Coast Umpqua Regional Solutions Advisory Committee.

¹² http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20191219-5010.

into the JCEP situation is unknown, but it is clear from Executive Order 13868 calling for the proposed regulation “update” that the federal intent is to further fossil fuel development, even if it means violating the water quality law Congress passed. For Oregon to ensure that projects like the JCEP do not violate our water quality standards to our collective detriment in the future, we have concluded that Oregon cannot permit the JCEP, regardless of mitigations they may propose or conditions the state may impose. To yield to pressure and find even conditional ways to approve the Section 401 certification application would be to act against our own self-interest as a state.

4. You have initiated several actions to pursue aggressive wildfire reduction, but both JCEP construction and operations would introduce whole new sets of triggers for wildfire beyond what we face today, taking us in the totally wrong direction in another way.

We support efforts to reduce wildfire and its devastating effects. You have established the Governor’s Council on Wildfire Response, committed to support increased funding, and put in motion through LC0083 potential legislation that appears to contain some important strategies for prevention and response. It is critical to fund programs designed to reduce risks of wildfire, and the Council on Wildfire Response report and LC 83 lay groundwork for bold action to combat the occurrence and reduce the multiple costs of wildfire in the face of the effects of climate change.

That we already face increasing risk of wildfire is undisputed, but the substantial increase in human and equipment activity in heavily timbered areas during PCGP pipeline construction can by itself be expected to increase the risk of fire to an unknown degree, as 62% of the pipeline route is forested and vulnerable to wildfire. Pipeline construction would occur primarily during “fire season,” as the company would keep a dawn to dusk, 60-hour work-week schedule. That means construction involving the use of feller-bunchers, chainsaws, bulldozers, track-hoes, rock saws, and other heavy equipment, as well as blasting, would take place across four southern Oregon counties under high to extreme wildfire risk conditions. PCGP could, and almost certainly would, seek waivers of restrictions from the Oregon Department of Forestry and other public land managers. In current drought conditions with longer, more intense fire seasons, this activity compounds the risks and costs of conflagrations state and local governments are already grappling with.

The Applicant and project proponents largely dismiss the risk of pipeline rupture and explosion during operation, despite the extensive soil and seismic characteristics present particularly in the Coos Bay and Klamath County portions of the pipeline alignment. Evidence of numerous areas at risk of soil liquefaction and lateral spreading, and extensive landslide-prone conditions have already been identified across the 229-mile route. Any nonchalance on this matter is inappropriate when the Pipeline and Hazardous Materials Safety Administration (PHMSA) reported an increasing number of ruptures and explosions nationwide due to particularly weather-related landslides. PHMSA consequently saw fit to issue two sets of protocols calling for renewed efforts to site, engineer, build, and monitor gas pipelines.¹³ Landslides are a fact of life in southern Oregon, including along the pipeline route.

As noted, JCEP/PCGP prepared a map set for the DEIS after strong and longstanding criticism by the Oregon Department of Geology and Mineral Industries (DOGAMI) that assessment of pipeline rupture

¹³ PHMSA, “Pipeline Safety: Potential for Damage to Pipeline Facilities Caused by Earth Movement and Other Geologic Hazards,” *Federal Register*, 5/2/2019.

risk was inadequate. Numerous landslide-prone areas are evident.¹⁴ The maps are nonetheless referenced in several tables developed by the Applicant that report that the risk of landslide at most points along the pipeline route is “low” or “none”¹⁵ In the FEIS, FERC staff finally took heed of DOGAMI’s concerns and recommended that the Commission make significant further study of landslide-prone areas a condition of their Order. But Oregon has no way of knowing whether the Commission will act on that recommendation and even if were to be addressed in the Commission’s Order, the recommendation specifies that the study would not need to be done until “prior to construction,” long after major permits would have been issued and enforcement options narrowed if effective action isn’t ultimately taken. Moreover, natural hazards are not the only landslide triggers. The Oregon Department of Land Conservation and Development (DLCD) lists as undercutting of a slope of cliff by erosion or excavation; shocks or vibrations from earthquakes or construction; vegetation removal by fires, timber harvesting, or land clearing; and placing fill (weight) on steep slopes.¹⁶ Further study in the FEIS recommendation may not cover that aspect of the situation.

JCEP has not made developing an Emergency Response Plan (ERP) designed to minimize risk in case of wildfire a priority. In the DEIS, a draft plan was said to be included in the Plan of Development (POD), Appendix H.¹⁷ What was actually there is only a concept paper, outlining an “Emergency Plan and Preparedness Manual” and a “Public Safety Response Manual.” Attachments that would describe various kinds of safety procedures are all said to be “forthcoming.”¹⁸ We could not find any evidence of acknowledgement or awareness that the presence of a buried pipeline may restrict fire-fighting activities, a reality that we and many others have raised numerous times and was openly acknowledged by Douglas Forest Protective Association District Manager Patrick Skrip just last summer during the devastating Milepost 97 wildfire.¹⁹ The DEIS did not discuss whether above-ground pipeline facilities would be vulnerable to over-heating and explosion and if so, how they plan to prevent an explosion and gas fire from endangering residents or fire-fighters or making an existing wildfire much worse.²⁰ We attempted to review Appendix H of the POD in the FEIS, but contents of the various named files have been changed since the DEIS and we were unable to locate Appendix H. The FEIS body includes the same reference to Appendix H as was in the DEIS.²¹

5. Oregon’s commitment to environmental justice and human health and safety would be thwarted by the risks associated with the installation of the JCEP pipeline, gas processing facility, compressor station, and shipping activities.

The League of Women Voters is concerned about the lack of concern in the FEIS or Applicant materials regarding risks of this project to all our citizens, and especially to low-income and minority populations.

¹⁴ PCGP, Resource Report 6, Appendix F, Geologic Hazards Maps (2), Figures 24-35.

¹⁵ PCGP, Resource Report 6, Appendix A.6 “Geologic Hazards and Mineral Resources Report;” compare with maps, Resource Report 6, Appendix F, Geologic Hazards Maps, Figures 26-33, 35.

¹⁶ DLCD, “Oregon’s Natural Hazards,” <https://www.oregon.gov/lcd/NH/Pages/Natural-Hazards.aspx>

¹⁷ 2019 DEIS, p. 4-775.

¹⁸ 2019 DEIS, Appendix F.10 PCGP POD-Part 3-22.PDF, Appendix H, “Emergency Plan and Preparedness Manual,” and “Public Safety Response Manual.”

¹⁹ Skrip is quoted as are similar concerns of Firefighters United for Safety, Ethics, and Ecology (FUSEE) in Juliet Grable, “Wildfires and Pipelines Don’t Mix,” August 1, 2019, <https://www.ourland-ourlives.org/post/wildfires-and-pipelines-don-t-mix>.

²⁰ 2019 DEIS, p. 4-775.

²¹ 2019 FEIS, p. 4-815.

Oregon’s Environmental Justice Task Force (EJTF) considered the JCEP proposal at its June 8, 2018 meeting and concluded by finding it to be not to be in Oregon’s best interests.²² The Klamath Tribes, the Yurok, the Karuk, the Confederated Tribes of Siletz Indians, and the Tolowa Dee-Ni Nation have all come out in strong opposition to the proposed project, and six Tribes have filed as intervenors in the federal regulatory process. From our observations, opposition to the JCEP by tribal leaders and members at hearings such as those offered by the Department of State Lands (DSL) last fall was almost universal. In large part, key considerations were the potential harm to the precious, life-giving waters of the state and all living things that rely on them and cultural concerns. The excavations along the PCGP route, JCLNG liquification facility, and shipping channel would impact the traditional homelands and culturally significant landscapes of six federally recognized tribes. The rivers, streams, wetlands, shoreline, intertidal resources, and subtidal habitats are traditional locations for fishing, gathering, and transportation used by Tribal nations. The Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians (CTCLUSI) have Tribal holdings and development plans in Empire at the Hollering Place and in Coos Head in Charleston. The lands of the North Spit and the Coos watershed and geographic area of Coos Bay are considered by the CTCLUSI to be a Traditional Cultural Property (TCP), “Q’alay ta Kukwis schichdii me.” Traditional subsistence and the cultural resources of the Coos Indians are likely to bear significant impact from the development and operation of the processing and shipping facility.

Coos County, where the impacts of the proposed JCLNG facility and terminal would be felt, has a higher than average proportion of people at or near poverty. Much publicity has been offered by supporters of this project to emphasize that the project would create jobs and support for our communities. However, the bulk of the jobs would last only during the four-year construction phase and they would be typical of a boom and bust economy. Over the decades, communities across the nation have learned that oil and gas projects don’t necessarily deliver jobs for local workers, since the necessary skill sets most workers need for a project of this magnitude and complexity must be gained by specialized training and experience. Socioeconomic studies and law enforcement records show that boom projects of this type can lead to community disruption of many sorts that put strains on local and state government budgets and service capacity, e.g., through increases in domestic violence, drug and alcohol abuse, crime, and homelessness. We can expect similar issues would attend the JCEP.

There is a well-publicized shortage of housing in the Coos Bay area. The housing demands for workers would exacerbate that shortage in the communities surrounding them during construction. And if workers were to use area hotels and short-term rentals, the shortages would also affect the tourism-based economy, as would diminished access to some attractions and excessive congestion caused by construction activities.

Project hazards of concern to environmental justice include the risks of leakage, spill, explosion, and fire, particularly for the areas along the pathway of dredging, filling, and ship operations when the facility is under construction and in operation. Pipelines and compressors stations are known to leak volatile organic compounds or VOCs. Blowdown at block valves along the pipeline and operations at the compressor station at the hub near Malin would emit elevated noise and air pollution. DOGAMI reviews have emphasized the hazards associated with placing the entire terminal and storage facility in a seismic

²² Environmental Justice Task Force, Minutes of June 8, 2018 Meeting, <https://www.oregon.gov/gov/Documents/EJTF%20Meetings%20and%20Reports/6.8.2018-EJTF-Meeting-Summary.pdf>.

zone, including in areas with water due to liquefaction. The pipeline would cross hundreds of waterbodies.

The proposed JCEP terminal would be equipped with five direct-drive combined-cycle combustion turbines to power refrigerator compressors, each rated at 524.1 MMBTU/hour. These turbines would generate thermal plumes along with significant noise. All LNG export terminals that handle and store large quantities of LNG are at risk for unconfined vapor cloud explosions when accidental releases of vapors or gases to the atmosphere are ignited. The Society of International Gas Tanker and Terminal Operators (SIGTTO) has developed criteria to minimize risks, including in the site selection and design for LNG ports and jetties. The proposed JCLNG Terminal conflicts with several of SIGTTO's best practices recommendations, one of which has already been implied in most of the above discussions of specific public safety hazards: SIGGTO discourages siting near population centers. Around 16,000 residents of the Coos Bay/North Bend area would likely be at least injured if a release of highly flammable LNG were to be coupled with an ignition source.

Additionally, SIGTTO recommends against siting on a bend, in configurations where vessels would be berthed adjacent to each other, near other docking facilities, in a channel that is less than five times the minimum width of tankers, or where tankers would not have ready escape to the open seas at all times. All of these risky conditions exist in JCEP's proposed location. Constraints regarding access to and from the proposed facility are of concern to all residents of the community. The entrance to the bay and navigation channel from open waters has a history of problems since the time of early ship navigation due to the nature of shore winds, and sea conditions. These conditions still exist in modern times. There is a 90-degree turn from the entrance into the bay, and then another bend near the proposed site that other ship traffic, including commercial and recreational users, must navigate past to enter the Coos Bay harbor. There is a high risk that a fully loaded LNG carrier ship could run aground at the bar. Moreover, the transit time for vessels from the proposed site would be 90 minutes, and would require a high tide, due to the draft of these very large ships. If there were a seismic event and tsunami warning, any ship in the loading area would not have adequate time to exit to the open ocean. These human safety concerns cannot be mitigated with management practices, as they are physical constraints in the navigation corridor.

The extensive habitat alterations of the project create a large carbon footprint for the facility and proposed navigation features. The public consequences of these operations would dramatically enhance Oregon's CO₂e footprint and have been estimated and evaluated for other projects. Additional continuous releases of CO₂e would occur with emissions from operation, as the facility would require a 60-megawatt chiller to cool the gas to liquid that would be running 24 hours per day.

6. The size, complexity, and legacy of the JCEP have combined to jeopardize the effective application of Oregon's Statewide Planning Goals to make a meaningful assessment and evaluation of the impact of the project on the southern coastal region and Coos Bay Estuary.

The JCEP proposal is the largest scale project ever proposed for the south coast of Oregon and beyond that, the current iteration conglomerates the two previous proposals under consideration for over fifteen years.

The proposed JCEP project contains a 230-mile pipeline that would cut across multiple watersheds and county and city jurisdictions, tribal, public, and state lands to connect with the proposed 200-acre LNG

and export terminal to be sited in the largest estuary within Oregon. Construction and dredging activities for the LNG processing and storage facilities and the tanker berthing facilities would impact 1,355 acres.

Since 2004, three iterations of the concept of the LNG terminal have been proposed for the Coos Bay location. The initial application for an import project for Northwest markets was flipped in the second application to an export facility to supply fracked gas to Asian markets. Over this legacy there have been three owners, each contributing their own documents, design plans, reports, studies, and other details to those carried forward from their predecessors, resulting in a mix of new and recycled application materials. In addition, prior relationships, negotiations, and agreements roll forward, including lease and purchase of land owned or controlled by the Oregon International Port of Coos Bay and Roseburg Forest Products which not only add to the confusion confronting the public and agencies, but challenge the independence of this project proposal. Especially noteworthy is the fact that the current Applicant has reimbursed the Port of Coos Bay more than \$21,700,000 during FY 2016-2019 for environmental consultants preparing and negotiating a proposal made to the US Army Corps of Engineers to widen and deepen the Federal Navigation Channel of Coos Bay. Yet these two clearly related projects are being considered separately across all regulatory processes.

From its beginning, the Applicants have used the Rural Enterprise Zone process developed by the Oregon Legislature to encourage and facilitate local, rural business, and industry development. The Applicant's current request for property tax abatement is for the export facility and associated infrastructure estimated to cost \$7.3 Billion. Pembina, a Canadian company with many billions of dollars in assets, in no way fits the description of a local or regional business that the Enterprise Zone statutes were intended to encourage and facilitate.²³

The local land use plans for the counties and cities have been overwhelmed by the permitting process.

JCEP has applied for more 60 permits to be able to construct and operate the entire project. The bulk are federal or state, but 13 are local land use permits—eight of which are administered by Coos County, two by the City of Coos Bay, two by the City of North Bend City, and one by Douglas County. Taking advantage of the diffuse system of authorities and individual permits across this landscape, the Applicant has provided to the various planning commissions hundreds of pages of materials, often without proper pagination or indexing of documents, appendices, and attachments. Those entities have established multiple timeframes for public comment; often commenting periods have run concurrently and not infrequently, public hearings on more than one matter of vital concern to the public were scheduled on the same days. The ability of both the public and government entities to manage this scenario has been constrained and, in our view, this has reduced the effectiveness of all review processes involved.

Limitations within the existing planning process, especially regarding the estuary, have hampered the ability of the designated local authorities to consider the comprehensive nature of the project.

²³ <https://www.marketwatch.com/investing/stock/pba/financials/balance-sheet>.

Oregon has laudable Statewide Planning Goals and guidelines first established in 1973 to promote local understanding of, and engagement in, decisions including those involving proposed projects and their consequences. Coos County and local cities implemented the Coos Bay Estuary Management Plan (CBEMP) in 1975; it was last updated in 1984. Much has changed since then without the opportunity to adapt the plan to serve the management of the estuary under circumstances confronted today. At that time, no one envisioned a project of the extent and magnitude of the JCEP. While awareness of global warming existed in 1984, the need for increasing resilience in coastal communities presented with the challenges of climate change and sea level rise was not considered. Planners in 1984 would not have foreseen changes in the local economy that exist today—the growth of tourism, the continued decline of timber and heavy industry, improvement in estuarine function, and the growing opportunities for sustainable development. The management of habitat needs for ESA listed fish and wildlife species were not fully considered. And no Tribal entities were represented in the 1984 Estuary Management Plan process because the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians were restored in October of 1984, after the plan was developed, and the Coquille Tribe of Indians was not restored until June of 1989.

In 2009 a citizen driven initiative the Partnership for Coastal Watersheds (PCW) was formed to bring science, management, and the community together to address land use and climate change issues through ecosystem management. The group created a community vision for the watershed and nearby coastal sub-basins, and a status and trends document assessing conditions in the project area and an audit of the CBEMP was completed in 2016.²⁴ The outcome from the project has been sidelined as a result of the challenge of JCEP.

Importantly, neither the goals of the existing CBEMP nor the associated code requires development of an environmental impact process. Instead, each city and county was to develop a “comprehensive plan.” The result is the absence of any foundational cumulative view of the project’s impacts. The responsibility for assessments of cumulative impacts was a major part of NEPA legislation passed in 1970 and was therefore in place and presumed by the developers of Oregon’s Planning goals to be the appropriate and effective locus to perform that essential task. But over time, such analysis as promised in NEPA has been seriously eroded in Environmental Impact Statements, including in the FEIS for the JCEP. And increasingly, scientists working in federal agencies have been intimidated or otherwise lost their ability to evaluate cumulative impacts of projects. The current federal administration has been aggressive in challenging and even silencing scientific findings related to environmental and public health impacts of fossil fuel development and operations.

All of these factors together mean that this massive project is proceeding through all three levels of regulatory processes, but particularly on the local level, without a meaningful and necessary sense of how it would impact the environment across southern Oregon and in the Coos Bay Estuary in particular.

The intent of Statewide Planning Goal 1 has been compromised by circumstances related to the three points detailed above.

²⁴ Schmitt, J.; M. Howard; and R. Parker. 2019. Coos Estuary Land Use Analysis. Report prepared for Coos County Planning Department and the Partnership for Coastal Watersheds. South Slough National Estuarine Research Reserve and University of Oregon Institute for Policy Research and Engagement, Charleston, OR.

The complexity and the legacy of the JCEP has challenged the opportunity for appropriate public participation in land use planning, Statewide Planning Goal 1. The evaluation of each of the local permit requests for modification and conditioning of existing zoning to accommodate this project has been handled by planning staff with use of hearing officers or councils of governments. Information provided by the Applicant has been offered for citizen review without adequate detail and was sometimes modified at the time of the public hearings. Numerous volunteer citizens concerned with the project have provided detailed evaluations of the proposed permit applications. In some instances, council of governments analysis and recommendations have been ignored in decisions in favor of the Applicant.

Also disturbing is the use of just one hearing officer by the city of North Bend and Coos and Douglas Counties. It appears that the same bodies contracted with this same individual to carry out processes during previous iterations of the JCEP, perhaps as early as 2010. We are not privy to the reason for this exclusivity, but on some occasions, he has presided over remands of his own decisions. Of special concern to us is the way his institutional memory of various parties, including members of the public, is manifested in his deliberations and reporting. He editorializes frequently in a manner that we find intimidating and discouraging to participation. The League takes a firm stand that practices that are chilling to free and open participation in governmental processes by the public are unacceptable. We document three examples from these reports:

In a report on REM 19-001, he reports:

On the other hand, the majority of the Opponents insist that the security zone is in fact an “exclusion zone,” or at the very least a de-facto exclusion zone. See, e.g., Exhibit 29, 30, 31, 33, 35, 64. The hearings officer suspects that some of the Opponents circulated erroneous “talking points” on this point in an effort to get citizens riled up . . . (p. 63)

In a summary regarding AM-18-010/HBCU-18-002 the officer writes:

Opponent Jody McCaffree contends the Application fails to show that the pipeline complies with CBEMP Policy #17. See McCaffree Letter dated April 12, 2019, at p. 18-19. Her argument is focused on dredging, and not well developed. Certainly, it does not explain how the Application’s response to Policy #17 is deficient. In fact, her testimony merely highlights the fact that even after 12 or more years being involved in these issues, Ms. McCaffree does not have even the slightest understanding of how CBEMP Plan Policy #17 works. (p. 113)

Hearings Officer’s Recommendation AM-18-010/HBCU-18-002:

Furthermore, Mr. Graybill’s second argument, that there is no evidence that the pipeline could survive an extreme earthquake causing 1 to 10 meters of vertical shift in the earth, is also it is not persuasive. The design earthquake would be the fourth largest since 1900. Neither ORS 215.296(1) nor CCZLDO §4.6.130.2 were intended to address any greater type of catastrophic event, and it is unlikely that any pipeline would survive a greater quake, given that pipeline thickness is not a large determiner of resistance to shear or failure. Ironically, persons living in Coos Bay would be unlikely to survive such an event described by Mr. Graybill, so it really does not matter what would happen to the pipeline. The hearings officer finds the entire argument to be pretextual and not genuine, given that nobody that is truly concerned about earthquakes and tsunamis would reside in the lower portions of Coos Bay. (pp. 67-68)

Exorbitant fees charged to challenge findings have seriously discouraged citizen involvement in the process. The most egregious example was initial notification given to several citizens that copy fees to appeal would be \$5,000, plus additional costs of \$35,000. These amounts were amended upwards upon consultation with the City Attorney to a minimum of \$5,000 and up to \$60,000. This action and other associated dialog with the City resulted in citizens dropping the appeal, as they feared jeopardy to their personal financial security. Actions such as these are in direct conflict with the intent provided in planning Goal 1, Point 6 that states adequate human, financial, and informational resources shall be allocated for citizen involvement and the governing body shall be responsible for obtaining and providing these resources. We note that 2017 ORS 215.422 specifies that a “review of decision of hearings officer or other authority Review of decision of hearings officer or other Authority, the governing body may establish a fee for the preparation of a written transcript. The fee shall be reasonable and shall not exceed the actual cost of preparing the transcript up to \$500.”

In 2019, an expose in the *Guardian* revealed that citizens opposing the project were subject to surveillance activities. The state LWV expressed in a letter to you its grave concerns about the inappropriateness of this action and the unacceptable public intimidation it engenders.²⁵

Final Thoughts

In view of the current climate emergency, our hopes for a positive future for Oregon rest on the tools at the state’s disposal to respond to the challenges we face. Climate change impacts are already underway and there appears to be no way to reverse them. So, our tasks are to do everything we can to slow down the process at the same time as we help our communities develop resilience and respond.

As discussed above, you have initiated and are engaged in a number of efforts designed to accomplish those two tasks, but we are concerned—progressively and more intensely each day—that the options open to Oregon and other like-minded states to act in our own best interests are being systematically diminished. In July of 2017, when the Rogue Valley LWV expressed to you our opposition to the Jordan Cove Energy Project, you described the process: “Siting of projects such as Jordan Cove involve both state and federal permitting processes. The state’s permitting processes are based on established standards that serve to protect the public good, including environmental quality, public health, and safety. In carrying out their role in the state’s share of the permitting processes, I expect Oregon’s state agencies to follow all laws and regulatory processes to the letter.” You went on to commit to “ensure the process is lawful and transparent, that there is opportunity for public input, and that Oregon’s best interests are represented throughout.”²⁶ That was welcome assurance. At the time, information was emerging that indicated that for many years, the fossil fuel industry had been working to maximize their interests in high places, but laws such as the Clean Water Act, National Environmental Policy Act, Clean Air Act, and Endangered Species Act, appeared to be firmly in place to protect the national public good, including environmental quality, public health, and safety. Local land use permitting processes had not been fully engaged on this massive of a project during previous iterations, but the Statewide Planning Goals were in place and we were optimistic that they would be equal to the task of ensuring a fair,

²⁵ <http://lwvor.org/wp-content/uploads/2019/08/LWVOR-to-Governor-and-AG-Re-State-Surveillance-2019-08-11.pdf>.

²⁶ Governor Kate Brown to League of Women Voters of Rogue Valley, July 21, 2017.

balanced, science-based assessment of pertinent impacts. We are confident in the competence and diligence of the staff in key state agencies to carry out agency missions and Oregon laws.

Since then, our members have exerted endless hours of study of the Jordan Cove Energy Project and the various, complex and highly individualized permitting processes on the local, federal, and state levels. A primary motivation has been to augment the level and quality of factual information at the disposal of decision makers, including the expert, but overburdened staff of your state agencies. We have submitted numerous substantive, technical public comments reporting on our findings and individual members have provided expert testimony on processes at the local level.²⁷ We also commented on the DEIS and communicated separately to the three FERC Commissioners our reasons for concluding that JCEP applications for the two federal authorizations currently before them should be denied.²⁸ We will note that, the more we have learned in the process, including from substantive comments by Oregon state agencies, the greater our conviction that this project would not only be disastrous for southern Oregon, but as described above, it would be antithetical to the best interests of Oregon.

It is now 2020. The federal statutory safeguards of the human and natural environment are systematically being diminished through hundreds of rule and program changes, many quite apparently and openly designed to facilitate the fossil fuel industry by eliminating the means within the process to assess and evaluate the impacts of climate change of projects, restricting impacts of projects on the environment, and reducing or even stripping away states' ability to protect critical resources granted by Congress. As noted above, proposed rule changes both you and the state League commented on pertaining to Section 401 of the Clean Water Act is just one example. We appreciate the efforts made by Attorney General Rosenblum and her counterparts in other states to point out to the Federal Energy Regulatory Commission the challenges their approval of fossil fuel infrastructure imposes on states' ability to attain their emissions goals to address climate change.²⁹ To our knowledge, there has been no response. The local permitting processes in the cities of Coos Bay and North Bend and in both Coos and Douglas Counties resulted in approvals so fragmented and inhospitable to members of the public as to call into question the efficacy of the Statewide Planning Goals to perform their essential function and to raise questions about how the Department of Land Conservation and Development (DLCD) can respond to that portion their CZMA consistency decision.

Even as we are impressed and gratified by the superb efforts of all involved state agencies to carry out their missions and Oregon law, we are deeply troubled as it appears that only the Oregon state regulatory system stands a chance of producing an accurate evaluation of the impacts of this behemoth project. And Oregon regulators have faced challenges every step of the way. JCEP has repeatedly submitted incomplete applications, provided inadequate information, missed deadlines, and challenged agencies' rights to request data or design plans. DEQ denied JCEP's 401 application without prejudice last May, worked with Applicant over the intervening months with the expectation of a reapplication

²⁷ In addition to links to comments already provided, see also Oregon DSL Removal-Fill permit application, http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20191219-5012; CWA 404, 408 USACE Supplemental Notice on permit application, http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20191219-5018; CZMA consistency application, http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20191219-5011.

²⁸ Our comment on the DEIS, https://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20190705-5052; our letter to Chatterjee, et al, http://elibrary.FERC.gov/idmws/file_list.asp?accession_num=20200102-5005.

²⁹ Maura Healey et al to Chairman Chatterjee, Commissioners McNamee and Glick, "State Clean Energy Policy Priorities," October 28, 2019.

this month, but now JCEP appears to have delayed further. From exchanges between DLCD and JCEP since the CZMA consistency certification process was launched, JCEP has challenged the Department's authority to request documentation and other information. The Applicant now charges DLCD with obstructionism, unfairness, and activism.³⁰ DSL's decision to deny yet another extension resulted in JCEP withdrawing their application, announcing that they will await FERC's decision. There is reason to expect that the Commission will issue "conditional approvals" soon—before key state permits are decided—despite repeated requests by Oregon agencies against such action. At the end of the road, should a denial of a key state permit result, various federal mechanisms appear to be lining up to summarily overrule those decisions. A severe challenge to our federalist system seems imminent. We offer our support and urge you to use every tool you have at your disposal to ensure the process is lawful and transparent and that Oregon's best interests are represented throughout.

Thank you for your service.

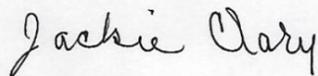
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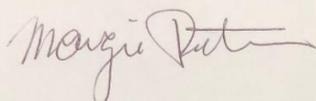
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³⁰ JCEP to DLCD, December 23, 2019.

Cc: Governor Kate Brown
Secretary of State Bev Clarno
Treasurer Tobias Read
Senator Ron Wyden
Senator Jeff Merkley
Congressman Greg Walden
Congressman Peter DeFazio
Tyler Krug, US Army Corps of Engineers
Kimberly Bose, Federal Energy Regulatory Commission
Oregon Senator Dallas Heard
Oregon Senator Dennis Linthicum
Oregon Senator Floyd Prozanski
Oregon Senator Jeff Golden
Oregon Senator Arnie Roblan
Oregon Representative Kim Wallen
Oregon Representative Cedric Hayden
Oregon Representative Gary Leif
Oregon Representative Vikki Breese-Iverson
Oregon Representative E. Werner Reschke
Oregon Representative David Brock Smith
Oregon Representative Caddy McKeown
Oregon Representative Pam Marsh
Coos County Commissioners John Sweet, Bob Main, Melissa Cribbens
Douglas County Commissioners Chris Boice, Tim Freeman, Tom Kress
Jackson County Commissioners Rick Dyer, Colleen Roberts, Bob Strosser
Klamath County Commissioners Donnie Boyd, Derrick DeGroot, Kelley Minty Morris
Coos Bay Mayor Joe Benetti
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