

Dr. Ann Hodgson
U.S. Army Corps of Engineers
Portland District (PM-E)
P.O. Box 2946
Portland, OR 97208-2946



Submitted via email

October 3, 2017

RE: Scoping Comments Regarding Notice of Intent to Prepare a Draft Environmental Impact Statement for the Oregon International Port of Coos Bay's (OIPCB) Proposed Coos Bay Channel Modification Project

Dear Dr. Hodgson:

Please accept these comments on behalf of Oregon Physicians for Social Responsibility regarding the scoping notice for the Proposed Coos Bay Channel Modification Project. Coos Bay is one of Oregon's most important and threatened salmon-bearing estuaries. The Bay is critical habitat for coastal coho salmon and is widely used for shellfish cultivation and gathering. Coos Bay retains significant toxic pollution from previous industrial activities. Oregon Physicians for Social Responsibility is concerned about the potential for massive dredging to disturb and mobilize long-lived contaminants in Bay sediments, potentially harming the health of people who rely on coho salmon and use the Bay for shellfish gathering. Salmon and shellfish have been and remain a vital source of sustenance and have irreplaceable cultural significance to Tribes in the region.

Oregon Physicians for Social Responsibility urges the Corps to conduct a full and thorough environmental impact statement (EIS) for the proposed dredging of 18 million cubic yards associated with the Coos Bay channel modification project. We urge the Corps to review the channel modification project as a connected action with the proposed Jordan Cove LNG terminal and Pacific Connector Pipeline, which would also degrade water quality, air quality and habitat quality in Coos Bay. We ask the Corps to undertake a detailed study of all areas of the Bay that could be impacted by the proposed channel modification, paying special attention to the potential for the project to mobilize toxic contaminants in the Bay. We urge the Corps not to rely on outdated data and to assess all areas of the Bay that could be impacted by the effects of the proposed massive dredging project. Clean water and clean air play a vital role in maintaining public health and safety.

To be specific, the U.S. Army Corps of Engineers EIS should:

- Disclose how widening and deepening the channel could change tidal dynamics, alter the bottom of the estuary, and increase tsunami hazard;
- Analyze the impacts of a tsunami on Coos Bay residents and businesses, with and without a dredging project of this magnitude;
- Disclose whether this project is engineered to benefit the Jordan Cove LNG project;
- Disclose other projects contemplated or supported by the Port of Coos Bay that would require dredging of the same scope and magnitude;
- Disclose all impacts to environmental justice communities;
- Disclose all impacts of increased noise and light and time of operations;
- Disclose impacts to migratory whales;
- Rigorously explore and objectively evaluate all reasonable alternatives to dredging, and for alternatives which were eliminated from detailed study;

- Conduct a full review of the direct, indirect, and cumulative effects of modifying the channel and disposing of the dredged material offshore in the context of the proposed Jordan Cove LNG terminal and Pacific Connector Pipeline;
- Analyze impacts to fishing and shellfishing areas within Coos Bay;
- Analyze health impacts stemming from loss of public access for fishing, recreation and other water uses;
- Analyze the health impacts of decreased economic opportunities for commercial fishers, oyster farmers and tour boats;
- Disclose all impacts to Tribes and to treaty rights;
- Consider impacts to water quality from dredging and disposal, including but not limited to dissolved oxygen, salinity, temperature, fecal coliform, and sediment contaminants;
- Determine whether this project has the potential to violate the Oregon water quality standards for dissolved oxygen and sediment;
- Consider that the dredging could destroy important habitat for fish and oysters;
- Consider the biological impacts, including but not limited to benthic organisms, fish, marine mammals, and invasive species;
- Consider how widening the channel may increase traffic from large tankers;
- Consider the climate impacts of increased number of mobile and stationary sources burning fuel, including bunker fuel;
- Consider the amount and impacts of increased number of sources of and increased emissions of Diesel Particulate Matter related to this project;
- Include reasonable alternatives not within the jurisdiction of the lead agency; and
- Include a "No Action" Alternative.

We believe that proposals to modify the Coos Bay Channel and construct the Jordan Cove LNG terminal and Pacific Connector pipeline will individually and in combination have direct, indirect and cumulative negative impacts to the health, safety, and environment of the residents of Southern Oregon including indigenous tribes that have lived here since time immemorial. For these reasons and others, each of these proposals are contrary to the public interest.

Lastly, Oregon Physicians for Social Responsibility supports and incorporates by reference the detailed comments submitted by Rogue Riverkeeper et al.

Thank you for consideration of our comments,

Regna Merritt, PA
 Healthy Climate Director
 on behalf of
 Oregon Physicians for Social Responsibility