

July 3, 2009

Clatsop County Commission  
800 Exchange St. Suite 100  
Astoria, OR 97103-4641

Dear Commissioners,

I write today to express sincere concerns about preserving and protecting the salmon fishery resources of the Columbia River estuary. The Bradwood Landing LNG terminal as proposed would be built adjacent to the head (upper end) of Clifton Channel, which comprises some of the best remaining relatively undisturbed estuarine salmonid rearing habitat left in the lower Columbia River. The Columbia River salmon fishery, once the greatest in the world, has been subjected to the death of a thousand cuts over the past century and more. Despite the legalistic rationalizations in the "Clatsop County Supplemental Findings for LUBA No. 2008-052," there is little doubt that, as stated in the *Biological Assessment* for the Bradwood Landing Project, June 2009, recently released by the FERC, the Bradwood LNG proposal "may affect, and is likely to adversely affect" 13 ESA-listed stocks of Columbia River salmonids. This is not a trivial matter.

I also write to express my concerns that the hearing to take up this issue once again has been scheduled when the commercial fishermen most likely to be adversely affected by development of an LNG terminal at Bradwood cannot be here to speak for themselves. Most members of the Columbia River commercial gillnet fleet are in Alaska for the summer season. When they return, they will bring with them income from distant-water fisheries that is a vital component of the fishing economy of the lower Columbia River. Even in a poor fishing year in Alaska, this distant-water fishing income amounts to a several million dollar infusion into our hard-pressed rural fishing communities along the lower river. I am aware that the Clatsop County Commission has been making the effort to form a consortium of lower river county governments in support of lower river fishing interests, for which I thank you. Yet, it seems as if there is a strange disconnection between that effort to support local fisheries and the unseemly rush to approve the Bradwood terminal project. The two actions would seem to be at odds with each other.

Ensuring the safety of fishermen, and of their boats and gear, is at the heart of protecting traditional fishing grounds. One of the issues pointedly ignored in the "Clatsop County Supplemental Findings for LUBA No. 2008-052" is the potential disruption(s) to traditional fishing grounds likely to be caused by LNG tanker traffic. According to the USCG Captain of the Port's "Waterway Suitability Report for Bradwood Landing LNG," dated February 28, 2007, "A moving safety/security zone shall be established around the LNG vessel extending 500-yards around the vessel but ending at the shoreline." The Waterway Suitability Assessment mandates exclusion zones along the Columbia River navigation channel, where vessels may not pass each other, including between River Miles 27 and 32 (from navigation marker G "17" to R

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[REDACTED]

“32”). As it happens, that stretch of the river encompasses some of the most productive gillnet fishing drifts on the lower river, including the “Gut,” “Channel,” “Swing,” “Zumwalt,” and “Three Tree Point” drifts. In particular, in the middle of Welch Island Reach near Three Tree Point, where the channel sets hard against the cliff on the Washington shore, there is scarcely 500 yards between the channel and the shoals on the opposite side. In addition to the danger of grounding, there are submerged dolphins on the south side of the channel, which could hole a gillnet boat or ruin hundreds of dollars worth of fishing gear in short order.

While most gillnet fishermen are used to working around freighter traffic in the navigation channel, moving safety/security zones and exclusion zones pose an entirely new threat to their fishery. This issue cuts dangerously close to reducing the viability of traditional lower river fishing grounds to the point where remaining here on the Columbia River may no longer be an option for some of our fishermen. Due to ESA restrictions, Columbia River fisheries are among the most highly regulated in the entire world. Fishing openers as set by the Columbia River Compact are usually measured in hours, and often are announced with very little lead time to get ready. Since gillnet fishing is heavily dependent on the stage and timing of the tide, a fisherman may have only a half-hour window of opportunity during an opener when the tide is exactly right for his drift and the gear he has hung in readiness. If he doesn't have his net in the water when the time is right, his opportunity to catch fish may be greatly diminished or eliminated entirely. As Bill Gunderson said in *Work Is Our Joy*, “It's all timing — within five minutes.”

If an LNG tanker comes through during that time frame when the fisherman has his limited opportunity to catch fish, and the fisherman is obligated stand clear of his fishing grounds to let the tanker pass, it may become the tipping point where he has to re-evaluate whether it makes sense to continue to reside on the lower Columbia. Our gillnet fishermen on the lower Columbia River continue to live here because they have roots here. Most of our fishermen come from multi-generational fishing families that emigrated here for the salmon fishing in the late 19<sup>th</sup> century. As the fishery has become increasingly regulated due to ESA limitations, our fishermen have invested heavily in portfolios of permits in other fisheries, both in Alaska and offshore, because it isn't possible to earn a living fishing only on the Columbia River anymore. But, because they have roots here, they bring their income from distant-water fisheries back here. Do we really want to risk losing these commercial fishing families?

Another concern related to LNG tanker operations is that of entrainment of juvenile salmonids during ballast and cooling water withdrawals while moored at the Bradwood terminal facility. Despite assurances from NorthernStar that NMFS- and ODFW-approved fish screening will be provided for water withdrawals at the Bradwood facility, most LNG tankers afloat today would have to be retrofitted to accommodate such equipment. NorthernStar cannot guarantee that tankers coming to Bradwood would be modified in this manner for screened water withdrawals. Further, the Coast Guard has questioned whether such screened water-withdrawal equipment would meet Coast Guard certification standards. NorthernStar's specifications for fish-friendly screening at Bradwood amount only to promises built on guesswork and supposition.

In short, the proposed Bradwood-NorthernStar LNG project fails to protect Essential Fish Habitat for listed stocks of Columbia River salmonids; threatens the safety and security of individual fishermen; poses substantial risk to investments in boats and gear; jeopardizes the continued economic viability of some of the most productive traditional fishing grounds on the lower river; and risks adding substantial new hazards for already threatened and endangered juvenile salmonids in rearing habitat used by all ESA-listed stocks of the Columbia River basin.

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Respectfully,

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