

LUBA says that the county should use the statewide planning goal definition of 'protect.'

The Bradwood LNG project does not comply with this definition. The requirement of protecting traditional fishing areas against disruptive inwater activities such as dredging is not being met. The project and Comprehensive Plan policy requires that threatened and endangered species habitat be protected from incompatible development. This LNG scheme at Bradwood IS incompatible development beyond reasonable doubt.

Millions of \$\$\$ have spent by the Federal Government and the States of Oregon & Washington, to save fish and habitat. The Northern Star Bradwood terminal is not conducive to the protection of salmon and other endangered and threatened wildlife.

SIZE DOES MATTER!

Considering the upland area occupied by the LNG terminal, construction of gas pipelines, power lines, pilings, piers, and the 2 or 3 seventeen story tall tanks which are reported to be as wide as a football is long, this is no small to medium project by any stretch of the imagination.

Clatsop County Land Use regulations say large industrial facilities are not allowed but the county changed that to exclude Northern Star's Bradwood Landing LNG facility by declaring the project to be small to medium.

Statewide Goal 16- says in part, that the goal is to recognize and protect unique environmental and social values of each estuary and wetlands; to protect, maintain, and where appropriate to develop. Northern Star's LNG project is NOT APPROPRIATE!!!

In Statewide Goal 17 it says: "to reduce the hazard to human life and property, and the adverse effects upon water quality and fish and wildlife habitat." It also talks about the use and enjoyment of Oregon's coastal shore lands.

Goals 16 & 17 are elements of the Comprehensive Plan which are germane at the local level through Clatsop County's stated policies. "Traditional fishing areas shall be protected when dredging, filling, pile driving or other potential disruptive in water activities occur." Do you honestly think that Bradwood Landing meets this criteria?

The perception in the community is that the county only gives lip service to the written and oral testimony of the public. I sincerely hope you prove this wrong!

My written testimony

June 29, 2009

To the Board of Clatsop County Commissioners;

PROTECT

The Land Conservation & Development Commission's definition of 'protect' includes protection of traditional fishing areas when disruptive water activities occur. How does Bradwood Landing/Northern Star's definition of the word 'protect' compare? The spoils from their planned

dredging could fill enough dump trucks lined up from Bradwood Landing to the California border! When the facility comes online, one of the possible by-products of re-gasification could be dumping warm water into the Columbia River. This doesn't sound like much protecting to me. As protectors of the river and the fish, especially the just emerging salmon, are we going to sentence them to death?

How does their project comply with the Comprehensive Plan policy requiring that endangered and threatened species' habitat be protected from incompatible development given the LCDC definition of 'protect?' I have not heard of a more incompatible project than the LNG terminal and accompanying facility on the Columbia River at Bradwood. The Federal Government, the State of Oregon, the State of Washington, and various private environmental groups, spend millions of dollars each year trying to save our Columbia River salmon. This liquified natural gas scheme does not make any sense. LNG is just not compatible. It is not a small nor even a medium sized project. Which brings us to the next remanded item.

SIZE MATTERS

The scale of this proposed project with all of its components can not in a million years be considered small to medium. Take a look at other LNG facilities in our country. The LNG terminals at Lake Charles, Louisiana and Southern LNG on Elba Island, Georgia come to mind. It is definitely a large project. The two or perhaps three tanks at the Bradwood site are described to be 17 stories high and as wide as a football field is long. This doesn't fit into my definition or understanding of 'small to medium.' As County Commissioners, elected by the citizens of Clatsop County, this should not fit your definition either.

GOAL 16: ESTUARINE RESOURCES

Goal 16 of the Oregon's Statewide Planning Goals and Guidelines deals with recognition and protection of the unique environmental, economic, and social values of every estuary. To quote Goal 16 in part, "To protect, maintain, where appropriate develop, and where appropriate restore the long-term environmental, economic, and social values, diversity, and benefits of Oregon's estuaries." OAR 660-015-0010(1)

Once the estuary at Bradwood is comprised by inappropriate economic development, it is unlikely it will ever recover. In following this line of thought, how can the estuary be restored after suffering the development of a large LNG terminal? Do you want to take a chance that everything will be alright? We cannot afford to throw away the meaning of Goal 16 for inappropriate development. Once the estuary is gone, it is gone.

GOAL 17: COASTAL SHORELANDS

Goal 17, states: "To conserve, protect, where appropriate, develop and where appropriate restore the resources and benefits of all coastal shorelands, recognizing their value for protection and maintenance of water quality, fish and wildlife habitat, water-dependent uses, economic resources and recreation and aesthetics. The management of these shoreland areas shall be compatible with the characteristics of the adjacent coastal waters; and

To reduce the hazard to human life and property, and the adverse effects upon water quality and fish and wildlife habitat, resulting from the use and enjoyment of Oregon's coastal shorelands."

The word protect comes up often in these two goals. One of the remands has to do with the source of the definition of the word 'protect.' It is clearly stated in which order a public entity can seek a definition of a word or phrase when administrating this ordinance.

1. Clatsop County Comprehensive Plan - The word 'protect' is not defined in the County Plan.
2. Any other Clatsop County resolution, ordinance, codes, or regulation
3. Any statute or regulation of the State of Oregon

---AND LAST---

4. Legal definition from case law or law dictionary

Permitting Northern Star's Bradwood Landing LNG Terminal is to ignore the protection of our beautiful, one of a kind river, estuary, and shorelines. By side-stepping the real implications of this LARGE project, you are failing to protect our, yours and mine, inheritance and protectorship of this most fragile natural environment. Please right the wrong you as county commissioners have done and deny the Bradwood Landing import and re-gasification facility.

Lori Durham
Astoria, OR