



LEAGUE OF WOMEN VOTERS® OF OREGON

The League of Women Voters of Oregon is a 98-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

August 15, 2018

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Chris Stine
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Re: NWP-2017-41 Clean Water Act Sections 404 and 401, Section 408, **Public Comment**
Requesting Denial of All Applications

The League of Women Voters of Oregon (LWVOR) supports the July 20, 2018, 26-page detailed science-based testimony addressing your decision-making criteria submitted by the Coos County, Umpqua Valley, Rogue Valley and Klamath County local Leagues. Since the 1950's the League has been in the forefront of efforts to protect air, land and water resources. The League of Women Voters of the United States (LWVUS) "believes that natural resources should be managed as interrelated parts of life-supporting ecosystems. Resources should be conserved and protected to assure their future availability. Pollution of these resources should be controlled in order to preserve the physical, chemical and biological integrity of ecosystems and to protect public health." The League of Women Voters of Oregon (LWVOR) ". . . opposes degradation of all of Oregon's surface and ground water. . . ." and declares that climate change is the greatest environmental challenge of our generation.

Recently at the June 2018 LWVUS convention the following Climate Change resolution passed: "**A Climate Test:** The League of Women Voters supports a set of **climate assessment criteria** that ensures that energy policies align with current climate science. *These criteria require that the latest climate science be used to evaluate proposed energy policies and major projects* in light of the globally-agreed-upon goal of limiting global warming to **1.5 degrees C**, informed by the successful spirit of global cooperation as affirmed in the UN COP 21 Paris agreement. (LWVOR proposed this Climate Test Resolution that passed with about a 99% vote.)" It is clear that this project does NOT pass the climate test, and therefore the project permits should be denied.

Additionally, LWVOR, jointly with LWV United States, has *amici* standing with Our Children's Trust '*Juliana vs U.S. Government*' [federallawsuit](#). The League decision to support this historical lawsuit with two amicus briefs, was based on Natural Resource and Social Policy positions, including; "Secure equal rights and equal opportunity for all. Promote social and economic justice, and the health and safety of all Americans." The complaint asserts that, in causing climate change, the federal government has

violated the youngest generation's constitutional rights to life, liberty, and property, as well as failed to protect essential public trust resources. "The courts have a duty to safeguard individuals' rights where the other branches have failed to do so. These Youth Plaintiffs are reliant on the judicial branch to declare their rights, and the District Court is the proper venue to develop the case record and decide the merits of these "vitally important issues."

Although we understand the arguments related to economic benefits, we believe that the long-term negative impacts to the climate, as well as the near-term negative impacts to our fishing and tourism industries, outweigh any such economic benefits. As such, we again ask that you deny permits for this project.

The League's advocacy for natural resource and social policy positions are very clear. We urge that the USACE and Oregon DEQ deny the above-named permit applications.

Thank you for considering our comments.



Norman Turrill, President
League of Women Voters of Oregon



Claudia Keith, Climate Change Portfolio
LWVOR Action Team

Cc: Governor Kate Brown
Secretary of State Dennis Richardson
Treasurer Tobias Read
Senator Ron Wyden
Senator Jeff Merkley
Congressman Greg Walden
Congressman Peter DeFazio
Oregon Senator Dallas Heard
Oregon Senator Dennis Linthicum
Oregon Senator Floyd Prozanski
Oregon Senator Arnie Roblan
Oregon Representative Sal Esquivel
Oregon Representative Cedric Hayden
Oregon Representative Gary Leif
Oregon Representative Mike McLane
Oregon Representative E. Werner Reschke
Oregon Representative David Brock Smith
Oregon Representative Caddy McKeown
Coos County Commissioners John Sweet, Bob Main, Melissa Cribbens
Douglas County Commissioners Chris Boice, Tim Freeman
Jackson County Commissioners Rick Dyer, Colleen Roberts, Bob Strosser
Klamath County Commissioners Donnie Boyd, Derrick DeGroot, Kelley Minty Morris
Coos Bay Mayor Joe Benetti
North Bend Mayor Rick Wetherell
Shady Cove Mayor Tom Sanderson
Myrtle Creek Mayor Ken Brouillard
Canyonville Mayor Jake Young
Winston Mayor Dick Hayes

Riddle Mayor William Duckett
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Jason Miner, Governor's Natural Resources Policy Advisor
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Meta Loftsgarrden, Director, Oregon Watershed Enhancement Board
Peter Daugherty, State Forester, Oregon Department of Forestry
Alexis Taylor, Director, Department of Agriculture
Matt Garrett, Director, Oregon Department of Transportation
Richard Whitman, Director, Oregon Department of Environmental Quality
Chris Carson, President, LWVUS