November 3, 2014

Coos County Commissioners
Coos County Courthouse
250 N. Baxter Street
Coquille OR 97423

RE: AM-14-10 and AM-14-11 Coos County Zoning Ordinance

First, I want to thank you granting me the extra time to review the changes made to the County Zoning Ordinance. Please add this letter to the official public comments on the proposed changes.

Because the cost of a hard copy of the Zoning Ordinance changes is prohibitive, I reviewed the proposed changes online.

There are issues about the report I would like to address, in both form and content. The Form Comments are general and refer to the whole ordinance. The Content Comments are specific to the pages and sections listed.

I. Form Comments.

1) Lack of uniformity in the changes applied to the document
   a) Indicating text will be deleted when it actually is moved
   b) Please explain bold type

2) Poor labeling of chapters and page numbers on the County's Planning Department's Pending Applications link:
   AM-14-10- and AM-14-11
   a) Haphazard Table of Contents
   b) Inconsistent page numbering throughout document
   c) Need for Headers and/or Footers
   d) Missing chapter titles
   e) Explanation of where Chapter V Is located

3) Confusion in Chapter III
   a) Incomplete table on page III-1
   b) Sloppy insertion of Coos Bay Estuary Management Plan (CBEMP) into Chapter III
   c) Lack of a key to explain the meaning of the initials listed in “District Designation”,
       Pages III-5 through III-7
   d) Identification of each Estuary Management Plan with Header and/or Footer

4) Typographical errors

II. Content and Citizen Involvement

I. Form

1) Lack of uniformity in the changes applied to the document

Comments by Susan P. Smith
Application AM-14-10 and AM-14-11

Exhibit: 1/13/14
Date: 1/13/14

Page 1
a) Indicating text will be deleted when it actually is moved. You stated that strikethroughs in the Ordinance indicate sections of text that will be deleted. Italics indicate additions proposed to the Ordinance. To cite one source of confusion among many found, please see Chapter I, Section 1.1.975 Vested Rights. The entire section is struck through, which indicates it will be deleted from the Ordinance. In fact this section isn’t going to be deleted. It is being moved to Chapter V, Article 5.4 Vested Rights (page V-18). My suggestion is to indicate when passages are being moved or designate these passages in other ways than using a strikethrough.

b) Please explain bold type. Pages V-18 through V-22 are in bold type. Please explain why this section is in bold type. There are many more instances of bold type in the document; I am only giving one example.

2 Poor labeling of chapters on the County’s Planning Department’s Pending Applications link: AM-14-10- and AM-14-11

a) Haphazard Table of Contents: AM-14-10 and AM-14-11 are both laid out haphazardly and inconsistently. My ability to understand the report’s layout was hampered by poor labeling of the chapters listed on the county’s website.

For example, when you click on the first link (AM-14-10 Coos County Ordinance Change), it opens up to a list of documents that serves as a table of contents to the report. Please note the inconsistency in formatting and my suggested corrections in parentheses:

Chapter I changes.pdf (Should be: Chapter I Changes)
new definitions Chapter II.pdf (Should be: Chapter II New Definitions)
Article 3.1 CBEMP Zoning Districts Uses and Activities Land Development Standards.pdf
(Should be: Chapter III Estuaries, including The Coos Bay Estuary Management Plan and The Coquille River Estuary Management Plan)
Chapter IV.pdf (Should be: Chapter IV Balance of County Zones, Overlays and Special Consideration)
(Should be: Chapter V See AM-14-11 Coos County Ordinance Changes)
Chapter VI Lots and Parcels.pdf (This title has proper formatting)
Chapter VII.pdf (Chapter VII has no name. Should be: Chapter VII Transportation, Access and Parking)

The second link on the county’s website is: AM-14-11 Coos County Ordinance Changes
AM-14-11 Coos County Ordinance
Chapter V.pdf (Chapter V has no name. Should be: Chapter V Administration).

b) Inconsistent page numbering throughout document. The numbering of the pages on the report is inconsistent. Some page numbers are designated by a Roman Numeral signifying the chapter number followed by a hyphen and the page number of the chapter. This is an acceptable form. However, there is no consistency in the numbering system. Chapters II and VII have no page numbers at all on them.

Comments by Susan P. Smith
Application AM-14-10 and AM-14-11
Chapter III has page numbers listed but no Roman Numeral chapter designation like the other four chapters do. Again, consistency in page numbering is essential and critical, particularly when reading online.

c) Need for Headers and/or Footers. In addition to consistency in page numbering, each page should have a Header and/or Footer denoting the chapter name. Again, this is critical because of reading the document online.

d) Missing chapter titles. Chapters V and VII should be named and the name should be included in the titles in AM-14-10 and AM-14-11.

e) Explanation needed of where Chapter V is located. When the drop-down menu for Coos County>Planning>Pending Applications>AM-14-10 lists it Table of Contents, there is no information on where to locate Chapter V, which is missing between Chapters IV and VI. As there is no explanation to why there is no Chapter V my suggestion would be to list Chapter V with the other chapters in AM-14-10. Following the title for Chapter, V, I suggest a link or reference to AM-14-11 where Chapter V is located. (Should be: Chapter V See AM-14-11 Coos County Ordinance Changes.)

3) Confusion in Chapter III

a) Incomplete table on page III-1 On Chapter III, page 1, there is a potentially helpful table listing where to find the two Estuary Management Plans, which are embedded in Chapter III. The table is incomplete, and has empty cells in the Article and Section column, as well as the page numbers column, which would indicate where the Estuary Management Plans could be found. (See Chapter III, "Zoning Table", Page 1.) As Chapter III begins, I already struggle to locate the two Estuary Management Plans, accessibility impeded by lack of pertinent information. Finding the Estuary Management Plans and navigating through them is a cumbersome task in this 521-page chapter.

b) Sloppy insertion of Coos Bay Estuary Management Plan (CBEMP) into Chapter III. I am guessing that Chapter III originally included the Coquille River Estuary Management Plan (CREMP), as part of the chapter on estuaries, and that and the Coos Bay Estuary Management Plan (CBEMP) was inserted into the document (from pages 378-423) later, not part of the original chapter. Again, the formatting is thrown off.

The Coos Bay Estuary Management Plan (CBEMP) starts on page 378. It is titled “Volume II CBEMP Policies.” This is incorrect labeling. The words “Volume II” should be deleted (there is no Volume I) The initials “CBEMP” should be changed to spell out the name in full in the title: “The Coos Bay Estuary Management Plan,” so someone unfamiliar with the document would have a comprehensible

Comments by Susan P. Smith
Application AM-14-10 and AM-14-11
title to work with.

The second estuary management plan begins on page 424. It is titled “Article 3.3 Coquille Estuary Management Plan.” The Word “River” should be included in the title so that it reads: “The Coquille River Estuary Management Plan.”

In reference to the title on page 424, the use of “Article 3.3”: If the Coquille River Estuary Management Plan is correctly titled “Article 3.3”, then the Coos Bay Estuary Management Plan should have an “article” designation preceding it.

My suggested corrections for titling the Estuary Management Plans are:

Article 3.3.1 The Coos Bay Estuary Management Plan (page 378)

Article 3.3.2 The Coquille River Estuary Management Plan (page 424)

c) Lack of a key to explain the meaning of the initials listed in “District Designation”, pages III-5 through III-7. Following is another example of lack of clarity or ease of access in the report. Again in Chapter III: Article 3.2, Table 3.2 on pp. 5-7. Each page has a table. The first column of the three tables is named “District Designation” followed by nine rows of one, two, or three letter initials: NS, CS, RS, D, WD, UD, UW, NWD, UDS. There is no key describing what these letters stand for. After scrolling through one hundred pages of Chapter III, I figured out that CS=Conservation Shorelands, UD=Urban Development, NS=Natural Shorelands, WD=Water Dependent. That leaves four sets of initials I don’t know the meaning of. The information needed to interpret the tables should be easily accessible and identifiable, not a hunt. (Note: I have not determined what RS, D, UW, NWD, or UDS stand for.) Again, this is hampering my ability to participate in this public process.

d) Identification of each Estuary Management Plan with Header and/or Footer. If the overall document does not include a Header and/or Footer describing each page, as I suggested above, the two Estuary Plans should have a Header or Footer designating the plan name on the pages of the two Estuary Management Plans, again to ease navigation through the chapter.

Because most people’s only option is reading the plan online, labeling the estuary plan pages with a Header or Footer denoting “CBEMP” or “CREMP” would help the reader as he or she scrolls between the two plans. Without that designation, a reader can get lost.

4) Typographical errors

In hope that the Zoning Ordinance document will be corrected before it is considered complete, I’ve

Comments by Susan P. Smith
Application AM-14-10 and AM-14-11
made a list of typographical errors I noticed as I was reading. I have copied the mistakes from the
document and have inserted them in bold italics into this document, followed by my suggested
corrections. They follow:

- Page IV-75. Note typographical error in section iii “canvas on a collapsible frame with on
  plumbing...”, should read “no plumbing”. This same error occurs in similar passages
  throughout the document related to yurts.

- Page V-17, “…Coos county may grant one extension period of up to 12 months if: “. Note that
  the “C” in County should be capitalized.

- Page V-17, “Variance regulations in CCZLDO Article 5.3 shall not apply Sections
  4.11.400...” Note to insert the word “to” after the word “apply”, i.e., “…shall not apply to
  Sections 4.11.400...”

- Page V-24, “…in the form one original hard copy and one exact copy or one original hard
  copy and one electronic...” Note to insert the word “of” after the word “form” i.e., “…in the
  form of one original...”

- Page VI-1, “SECTION 6.3.100 PROPERTY LINE ADJUSTMENTS: “ Note incorrect spelling
  of Adjustment (missing the letter “J”).

II: Content and Citizen Involvement
As stated in Land Use Policy Goal 1, Citizen Involvement is a key component of the land use process.
Public accessibility, public inclusion, transparency, and user-friendliness, should all be attributes of this
Zoning Ordinance Change document and process.
Instead, I see instances of exclusion, efforts to diminish transparency, and indirect negative impact or
user-friendliness in the poor preparation of the document.

- Exclusion By no longer publishing notices of public meetings like the Citizen's Advisory Board
  in the newspaper, fewer people can be informed and involved. See Section 1.4.600, number 2,
  page I-10 (Note: I am limiting examples to one, although I can cite many more.)

- Transparency's decline: See: Chapter I, Section 1.4.700, Meetings, 6b. “declaration of any ex-
  pected contacts or conflicts of interest” (page I-12). This passage will be struck. This passage
  should be left in the document, as it inspires transparency in the public process.

- Negative impact on user-friendliness. The poor presentation and layout of this document
  hinders a citizen's ability to review the Zoning Ordinance Changes. (See Part I of this letter: Form)
Again, thank you for allowing me to participate in the Zoning Ordinance Changes process. I hope my input helps. Thank you for your effort.

Respectfully,

Susan P. Smith

cc: Jill Rolfe
Planning Director,
Coos County Planning Department
250 N. Baxter
Coquille OR 97423

Note: to Jill, If you decide you want to correct the obvious and unintended errors, such as the typographical ones, to the Online version now, please put the changes in blue so I can see that you made the correction.

Thank you,

Susan P. Smith

Comments by Susan P. Smith
Application AM-14-10 and AM-14-11