October 15, 2014  
Coos County Commissioners  
Coos County Courthouse  
250 No. Baxter Street  
Coquille OR 97423  

RE: Proposed changes to Coos County Zoning Ordinance

As a homeowner in Coos County since 1981, I am extremely concerned about the number of changes being proposed to the Coos County Zoning Ordinance at this time. The proposed changes encompass areas where I own property and indirectly and directly impact their use, desirability for resale, and the future direction of development in our area. It takes time to discern which of the proposed changes are potentially significant and which are clearly housekeeping. For example, without giving thought to some of the changes I have read thus far, one might assume they are insignificant when in fact the change proposed is quite dramatic.

I particularly object to the changes and policies which limit, rather than facilitate, public participation and comment in the planning process.

For example, the proposal to change the public notice of land use issues from 14 days in the newspaper with 7 days posted on the County bulletin board. I object to this change because it limits access to the notice when I believe we ought to be maintaining the time-length and expanding venues of access. This would be more in keeping with Goal #1 of land use planning.

I am highly interested in making an informed reading of this document and need significant additional time. Therefore, I am requesting an additional 120 days to allow me and other members of the public to review the proposed changes to the zoning ordinances for Coos County and to make public comment. After attending the Planning Commission meeting earlier this month it became clear to me that there are key issues being addressed in these changes.

Additionally, holding meetings only at 10:00 a.m. on a weekday precludes many citizens from attending to share verbal testimony and to hear the testimony of others in situ. Attending the County Commissioners hearing on October 16, 2014 would have required that I take off 1/2 day from work. While I am grateful to have the opportunity to submit written comments, preparing written documents for submission is far more time consuming than presenting verbal testimony and inhibits rather than facilitates diverse public comment and participation. To facilitate more public participation, I request that land use matters particularly proposals of this magnitude should include evening hours for public comment. This change should be added to the appropriate section of the ordinance regarding public meetings.

Exhibit: 5  
Date: 10-15-14
I also oppose the following changes:

**Section 4.4.220**
Addition 12 referring to new high intensity recreation uses

I object to this addition and need more time to review it. I have concerns that this proposed change is being tailored to address a specific project and piece of land already under discussion rather than meeting the overall intent of creating guidelines for planning in the future.

**Section 4.5.120**
Addition 1 regarding Campgrounds and Private Parks

I object to this addition because the specific definitions of “temporary” and “emergency purposes” need to be provided. Also, this section needs to specifically exclude temporary housing that is designed to support industrial development versus meeting recreational purposes. There are similar passages in the proposed changes in other sections regarding campgrounds and private parks and these should be made consistent throughout the document.

**Section 4.6.140**
This section contains a definition of temporary as 30 days during a consecutive 6-month period in the same campground by a camper or camper’s vehicle and may be appropriate to add to Section 4.5.120.

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.

**Section 4.6.220- Hearings Body Conditional Development and Use:**

1. Non-residential Uses
   f. Utilities
   I have questions and object to proposed changes in this section and need additional time to review and respond after my questions are addressed.

   “Public service” in this section needs to be clarified and to read “public service for the citizens of Coos County”. As the people of Coos County are the ones being impacted, it should be clarified that they are the ones to be served by the utility.
Further changes and clarification are also needed in this section regarding the following:

Are the transmission lines limited to electricity? Could these proposed changes regarding transmission lines be related to a gas pipeline? The use of transmission lines and associate transmission lines needs to be spelled out regarding what can and cannot be transmitted. In #5 under this section it states “if, after an evaluation, or reasonable alternative, the applicant demonstrated that the entire route of the associate transmission line meets two or more of the following (a-h), it can be approved. I think “two or more of the following” is insufficient for approval and recommend that the language should be changed to read “if all of the following are met then the application can be approved.”

Certainly if public safety or technical and engineering feasibility are compromised, it would be inappropriate to approve a project and this is what could happen if this section is to remain as currently written. More time is needed to carefully address the specific language for this important passage.

Article 4.11 Special Development Considerations and Overlays

Section 4.7.100 4.11.100 Purpose

There has been some difficulty locating airport overlays and these maps and all overlay maps need to be readily accessible to the public particularly as related to special considerations and hazard zones. It is difficult to make reasonable comments when the public does not have access to the necessary information.

A tsunami overlay needs to be created for the County and should be part of any ordinance changes.

Section 4.7.105 and Section 4.7.115

I object to these sections being removed from the ordinance as more detail and specificity is helpful to planners.

Section 4.11.125 Special Development Consideration

Reiterating that plan maps and overlay maps need to be easily accessible and housed in a particular place on the County website as well as available in reference sections of County libraries. It is prohibitive cost-wise for individuals to copy these documents and citizens cannot participate without access to the relevant materials. This recommendation includes copies of the Comprehensive Plan.
4.11.125 (continued)

I object to the proposed Purpose Statement in this section and ask that the phrase “to the people of Coos County” be added so the passage would read: “...except where conflicting uses are identified during implementation of the Plan, and such uses are justified based on consideration of the economic, social, environmental, and energy consequences of the conflict uses to the people of Coos County.”

#7 Natural Hazards (Balance of County Policy 5.11)

I object to this section and request that specific language about tsunami zones and threats be added to the list of natural disaster and hazards in the Purpose Statement as well as addressed in the list of potential natural hazards preceding the Purpose Statement.

In section “b: I object to changing the word “dwellings” to structures” as structures provides a much broader definition and changes the intent of what can be permitted. I would like an explanation for the need for this proposed change and sufficient time to respond.

OVERLAY ZONE
Section 4.11.200 and Section 4.11.235

I request that specific language and map overlays regarding tsunami threats be included in the Flood Plain definition and Coastal High Hazard Area and that specific overlays be completed and made easily accessible to the public.

Southwest Oregon Regional Airport

4.11.445 Land Use Compatibility Requirements (spelling error in document “requirments”)

I object to #4 Industrial Emissions. The language is not strong enough and is not in keeping with language for other similar passages in this section. For example glare and outdoor lighting that impinge upon pilot’s visibility and vision are not permitted, without exception. There is no language elsewhere in this section that allows for exceptions based on mitigation. Industrial emissions should in fact have stricter guidelines because they are more capricious and less easy to manage. Passage should read as follows:

“No new industrial, mining or similar use, or expansion of an existing industrial, mining or similar use, shall as part of its regular operations cause emissions of smoke, dust or steam that could obscure visibility within airport approach surfaces.” Any language after “surfaces” should be struck.
There is an additional comment it would be important for the Commissioners and Planning Commission to address regarding concerns that exist about certain FEMA flood plain maps. This issue was discussed by Congressman DeFazio in his last Town Hall meeting when he advised that Congress had put a hold on the new LIDAR maps due to problems with accuracy especially in areas with significant underbrush. It seems important that the County create a process for citizens to file grievances when the maps are found to be in error since this can have a significant impact on property values.

Thank you for considering my comments. Again, I ask for additional time, specifically 120 days, to respond to your feedback, then review and prepare additional comments on this critical matter of the proposed ordinance changes. Changes of this magnitude require measured and thoughtful responses and I ask you to support additional opportunity for public comment.

Sincerely,

Beverly Segner
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Coos Bay OR 97420