

BOARD OF COMMISSIONERS
COUNTY OF COOS
STATE OF OREGON

IN THE MATTER OF AMENDING)
THE COOS BAY ESTUARY)
MANAGEMENT PLAN AND ZONING) ORDINANCE 23-06-005PL
AND LAND DEVELOPMENT)
ORDINANCE)
(TEXT AMENDMENT AM-22-005))

The Board of Commissioners for the County of Coos ordains as follows:

SECTION 1. TITLE

This Ordinance shall be known as “Coos County Ordinance No. ORDINANCE 23-06-005PL.”

SECTION 2. AUTHORITY

This Ordinance is enacted pursuant to the provisions of ORS 203.035 and ORS Chapter 215.

SECTION 3. PURPOSE

The purpose of this Ordinance is to amend Volume II, Part 1 of the acknowledged Coos County Comprehensive Plan; this Ordinance therefore amends Coos County Ordinance 82-08-015L and amendments thereto, which adopts Volume II of the Coos County Comprehensive Plan. The purpose of this Ordinance is also to amend Coos County Ordinance 85-03-004L and amendments hereto, which is the Coos County Zoning and Land Development Ordinance that implements Volumes I, II, and III of the Coos County Comprehensive Plan; this Ordinance therefore amends Ordinance 85-03-004L.

This amendment is necessary to amend the 1984 Coos Bay Estuary Management Plan, Part 1 with detailed updates to create a cohesive multi-jurisdiction plan with the City of Coos Bay and City of North Bend.

SECTION 4. FINDINGS

The Board of Commissioners find this amendment complies with Oregon Statewide Planning Goals as demonstrated in Exhibit “A” Findings of Fact, Exhibit “B” December 28, 2023 Revisions Memo, Exhibit “C” Coos County Zoning and Land Development Ordinance Chapter III Revisions, and Exhibit “D” Revised Coos Bay Estuary Management Plan Volume II, Part 1, Exhibit “E” Progression Timeline of Coos Bay Estuary Management Plan Updates, Exhibit “F” Response to Comments, and Exhibit “G” Resolution 23-12-262PL .

SECTION 5. ADOPTION OF AMENDMENTS TO THE COOS COUNTY COMPREHENSIVE PLAN AND TO THE COOS COUNTY ZONING AND LAND DEVELOPMENT ORDINANCE

Ordinance 82-08-015L and amendments thereto and Ordinance 85-03-004L and amendments thereto are repealed to the extent that they conflict with this Ordinance. Said Ordinance shall remain in full force and effect in all other respects.

SECTION 6. REPEAL OF INCONSISTENT ORDINANCES

Coos County Ordinance 82-08-015L and amendments thereto and Ordinance 85-03-004L and amendments thereto are repealed to the extent that they conflict with this Ordinance. Said Ordinance shall remain in full force and effect in all other respects.

SECTION 7. SEVERANCE CLAUSE

If any section, subsection, provision, clause or paragraph of this Ordinance shall be adjudged or declared by any court of competent jurisdiction to be unconstitutional or invalid, such judgement shall not affect the validity of the remaining portions of this Ordinance; and it is hereby expressly declared that every other section, subsection, provision, clause or paragraph the Ordinance enacted, irrespective of the enactment or validity of the portion thereof declared to be unconstitutional or invalid, is valid.

SECTION 8. SAVINGS CLAUSE

Unless otherwise specified herein, the adoption of this Ordinance shall have no effect on existing litigation and shall have no effect on any action or proceeding pending on the date of adoption of this Ordinance.

SECTION 9. EMERGENCY CLAUSE

The Board of Commissioners for the County of Coos deems this Ordinance necessary for the immediate preservation and protection of the public peace, safety, health and general welfare for Coos County and declares an emergency exists, and this Ordinance shall be in full force and effect upon its passage.


Adopted this Dated this 10th day of January, 2024

BOARD OF COMMISSIONERS

ATTEST



Recording Secretary



Chair

Approved as to form:

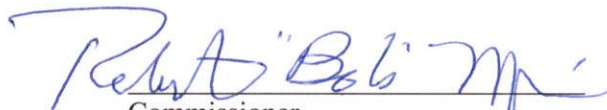


Office of Legal Counsel



Vice Chair

1st Reading: October 5, 2023
2nd Reading: January 10, 2024
Effective Date of Adoption: January 10, 2024



Commissioner

Exhibit A:

Findings of Fact

APPLICABLE IDENTIFIED REVIEW CRITERIA FOR REZONE:

- a. Coos County Zoning and Land Development Ordinance (CCZLDO), Article 5
- b. Oregon Statewide Planning Goal Compliance

a. Coos County Zoning and Land Development Ordinance, Article 5

• ***SECTION 5.1.100 LEGISLATIVE AMENDMENT OF TEXT ONLY:***

An amendment to the text of this ordinance or the comprehensive plan is a legislative act within the authority of the Board of Commissioners. [OR 04 12 013PL 2/09/05]

FINDINGS: The County Board of Commissioners is the authority for text and map amendments for the ordinance and comprehensive plan. This is a legislative act, and the Board of Commissioners has treated the amendments consistently with Article 5 of the Coos County Zoning and Land Development Ordinance.

- ***SECTION 5.1.110 WHO MAY SEEK CHANGE:*** *Coos County shall consider the appropriateness of legislative plan text and map amendment proposals upon:*
 1. *A motion by the Board of Commissioners; or*
 2. *A motion of the Planning Commission; or*
 3. *The submission of formal request made by either:*
 - a. *The Citizen Advisory Committee; or*
 - b. *An application filed by a citizen or organization, accompanied by a prescribed filing fee. If a Measure 56 notice is required the applicant shall be responsible for the payment of all cost associated with that service.*

FINDINGS: At their January 23, 2023 regular meeting, the Coos County Board of Commissioners per 5.1.110 of the CCZLDO moved to initiate the legislative process to the Comp Plan and Zoning Ordinance, with the condition that this will not change any of the zoning districts/management unit designations. As no changes to zoning districts/management unit designations are proposed at this time, staff finds application in compliance with Section 5.1.100.

- ***SECTION 5.1.125 MINOR TEXT CORRECTIONS:*** *The Director may correct this ordinance or the Comprehensive Plan without prior notice or hearing, so long as the correction does not alter the sense, meaning, effect, or substance of any adopted ordinance.*

FINDINGS: Scrivener error corrections are proposed throughout Part 1 and Part 2 of the CBEMP. These corrections include corrections of grammatical errors, including spelling errors, typing errors (spacing, formatting, etc.), subject/verb agreement, etc. Also proposed are changes to agency names, Oregon Revised Statute and Administrative Rule references, and permit names, where appropriate to reflect changes that have occurred to these proper titles over the 40 years since the original adoption of the CBEMP. As these corrections do not alter the sense, meaning, effect, or substance of the Ordinance, staff finds that the Director may correct these elements without prior notice or hearing. Staff finds that these types of corrections are in compliance with the CCZLDO. The other proposed amendments have been published and posted as required to be adopted. Therefore, the County has complied with applicable criteria.

b. Oregon Statewide Planning Goal Compliance

Oregon Statewide Planning Goals are a set of 19 goals established by the state government to guide land use planning and decision-making throughout the state. These goals provide a framework for local governments, land use planning agencies, and other stakeholders to shape the physical, social, and economic development of their communities. To provide some context to the process and summary of the Oregon Planning Program staff has summarized the processes below.

The Oregon Statewide Planning Goals cover a broad range of topics and aim to address various aspects of land use planning, conservation, and development.

- *Oregon's Statewide Planning Goals & Guidelines Goals*
 - *1 Citizen Involvement*
 - *2 Land Use Planning*
 - *3 Agricultural Lands*
 - *4 Forest Lands*
 - *5 Natural Resources, Scenic and Historic Areas, and Open Spaces*
 - *6 Air, Water and Land Resource Quality*
 - *7 Areas Subject to Natural Hazards*
 - *8 Recreational Needs*
 - *9 Economic Development*
 - *10 Housing*
 - *11 Public Facilities and Services*
 - *12 Transportation*
 - *13 Energy Conservation*
 - *14 Urbanization*
 - *15 (not applicable to Coos County)*
 - *16 Estuarine Resources*
 - *17 Coastal Shorelands*
 - *18 Beaches and Dunes*
 - *19 Ocean Resources (not applicable to Coos County)*

Each goal includes specific policies and guidelines to guide land use planning and development decisions.

Local jurisdictions in Oregon are required to incorporate these goals into their comprehensive plans and land use regulations, ensuring consistency with the statewide planning framework. However, there is flexibility for local communities to adapt and interpret the goals based on their unique characteristics, needs, and priorities while still meeting the overarching objectives of sustainable development and resource conservation. The flexibility is accomplished through an exception process.

The Oregon Statewide Planning Goal Acknowledgment Process refers to the procedure by which local comprehensive plans and land use regulations are reviewed and acknowledged by the state. It is part of the land use planning system in Oregon, which aims to ensure that local planning efforts align with the statewide goals and guidelines established by the state.

Under the acknowledgment process, local governments in Oregon are required to prepare comprehensive plans and land use regulations that are consistent with the statewide planning goals. These goals cover various aspects of land use and development, such as protection of natural resources, preservation of agricultural and forest lands, provision of housing, and transportation planning, among others.

Once a local government has completed its comprehensive plan and land use regulations, it submits them to the state's Department of Land Conservation and Development (DLCD) for review. DLCD evaluates the submitted materials to determine if they meet the requirements of the statewide planning goals. This review includes assessing the compatibility of the local plan with the goals and evaluating the plan's compliance with state laws and administrative rules.

If DLCD finds that the local plan is in compliance with the statewide planning goals, it issues an acknowledgment. The acknowledgment signifies that the local government's plan and regulations are consistent with the goals and have met the state's requirements. The acknowledged plan and regulations then serve as the basis for land use decisions within that jurisdiction.

The purpose of the acknowledgment process is to promote consistency, coordination, and coherence in land use planning throughout the state of Oregon. It ensures that local planning efforts are aligned with statewide goals and guidelines, promoting sustainable and orderly development while protecting valuable resources and addressing community needs. Coos County was originally acknowledged in 1985, and any subsequent changes to the acknowledged plan are referred to as Post Acknowledgement Plan Amendments. Coos County underwent periodic review when required in the 1990s and was once again acknowledged for goal compliance. Each post-acknowledgment plan amendment requires a goal compliance and consistency determination, and once consistency is established, acknowledgment is achieved. This following provides findings to the goal consistency.

FINDINGS: This request is consistent with the Oregon Statewide Planning Goals, as mandated by statutes that specifically address estuarine, tidal, marsh, wetland, and beach and dune areas. These coastal concerns are comprehensively addressed in Goals #16, #17, #18, and #19. Notably,

the Statewide Planning Program, approved as part of the State of Oregon Coastal Management Program, enforces policies that specifically address Goals 16, 17, and 18.

While other statewide planning goals have been addressed within larger comprehensive plans, they are not required to be readdressed in the specific context of the Coos Bay Estuary Management Plan. This strategic approach ensures that the Coos Bay Estuary Management Plan remains in compliance with and supportive of the broader Statewide Planning Goals, especially those crucial to coastal and estuarine management. The Coos Bay Estuary Management Plan comprehensively covers the Coos Estuary and coastal upland shorelands, aligning with the objectives outlined in Goals 16 and 17. Notably, the upland area coverage has been expanded strategically to include additional areas deemed necessary for carrying out the protections and functions outlined in the aquatic portions of the plan. This expansion ensures a holistic and integrated approach to the management and preservation of the Coos Bay Estuary, encompassing both aquatic and upland environments.

The evaluation and revision of the Coos Bay Estuary Management Plan (CBEMP) is a multifaceted process crucial for effective community development. The CBEMP comprehensive plan serves as a comprehensive blueprint for guiding various aspects of development, including land use, infrastructure, economic development, conservation, and community goals within the Coos Bay Estuary, encompassing both water and shorelands. The plan amendment process is a response to the changing needs of the community, laws, and is designed to ensure that the CBEMP remains relevant and adaptive to evolving circumstances. Coos County, the City of Coos Bay, and the City of North Bend are charged with ensuring that the CBEMP responds effectively to these circumstances.

- *GOAL 1 CITIZEN INVOLVEMENT – Goal 1 calls for "the opportunity for citizens to be involved in all phases of the planning process." It requires each city and county to have a citizen involvement program containing six components specified in the goal. It also requires local governments to have a committee for citizen involvement (CCI) to monitor and encourage public participation in planning.*

FINDINGS: The Plan provides a robust citizen involvement process for widespread citizen participation. The citizen involvement section in the Plan is addressed in Section 2 and provides a general structure for involving a cross-section of affected citizens in all phases of the planning process. As a component, the program for citizen involvement includes an officially recognized committee for citizen involvement (CCI) broadly as well as a technical advisory committee and steering committee. It is not necessary nor beneficial to explicitly define within the CBEMP the composition of each of these advisory committees; doing so would leave little room in the future to be flexible to add in other industries or interests not currently contemplated.

All of the committees along with public meeting laws and notice requirements found in the CCZLDO Article 5 address the requirements of Goal 1 to provide a pathway for citizens to be involved in all phases of the planning process within the CBEMP.

Several open houses, work sessions and adequate public notice of the proposed changes has been provided through the public notice process as specified in Article 5.0 of the Coos County

Zoning and Land Development Ordinance. The Department of Land Conservation and Development was notified of the intended modifications and did not express any concerns in writing about the changes. The county's process involves various forms of notification in the impacted areas, publication in the local newspaper of general circulation (The World Newspaper), and notification of impacted governmental agencies, recognized neighborhood groups, and any person who requested notice in writing. Public hearings were held at the Planning Commission and Board of County Commission levels. Notifications of these public hearings follow the requirements of 5.0.900 of the CCZLDO. Several joint work sessions were held with the County and City officials to take comment.

- *GOAL 2 LAND USE PLANNING - Goal 2 outlines the basic procedures of Oregon's statewide planning program. It says that land use decisions are to be made in accordance with a comprehensive plan, and that suitable "implementation ordinances" to put the plan's policies into effect must be adopted. It requires that plans be based on "factual information"; that local plans and ordinance be coordinated with those of other jurisdictions and agencies; and that plans be reviewed periodically and amended as needed. Goal 2 also contains standards for taking exceptions to statewide goals. An exception may be taken when a statewide goal cannot or should not be applied to a particular area or situation.*

FINDINGS: This request is consistent with Goal 2, as the County has established a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions. The CBEMP is made of three parts:

- Part 1: Plan Provisions, which includes specific plan provisions -- map decisions and written policies that are designed to provide guidance necessary to assure wise use of the Coos Bay Estuary and adjacent shorelands;
- Part 2: Inventories and Factual Base, which contains data and other factual information that supports management decisions presented in Part 1; and
- Part 3: Linkage/Statewide Goal Exceptions, which contains findings for Statewide Goal Exceptions taken at the time of original plan adoption for proposed development

The proposed change followed the process established in Chapter 5 of the Coos County Zoning and Land Development Ordinance and has been found compatible with the County's Comprehensive Plan. The structure of the document has remained unchanged with updates to Part 1 to consolidate the multi-jurisdictional process and include all management units. Therefore, the CBEMP is consistent with Goal 2.

- *GOAL 3 AGRICULTURAL LANDS - Goal 3 defines "agricultural lands." It then requires counties to inventory such lands and to "preserve and maintain" them through farm zoning. Details on the uses allowed in farm zones are found in ORS Chapter 215 and in Oregon Administrative Rules, Chapter 660, Division 33.*

FINDINGS: The CBEMP upland areas do contain some agricultural lands within the the Coastal Shoreland Areas. There have been no changes to the policies that will affect Agricultural Lands and the plan remains consistent.

- *GOAL 4 FOREST LANDS - This goal defines forest lands and requires counties to inventory them and adopt policies and ordinances that will "conserve forest lands for forest uses."*

FINDINGS: The CBEMP upland areas do contain some forestlands within the Coastal Shoreland Areas. There have been no changes to the policies that will affect Forest Lands and the plan remains consistent.

- *GOAL 5 OPEN SPACES, SCENIC AND HISTORIC AREAS AND NATURAL RESOURCES - Goal 5 comprehensively addresses a wide range of natural and cultural resources, including wildlife habitats and wetlands. It establishes a systematic process for the inventory and evaluation of each resource. In cases where a resource or site is deemed significant, local governments are presented with three policy choices: preserving the resource, allowing proposed uses that conflict with it, or finding a balanced approach that considers both the resource and conflicting uses.*

FINDINGS: Although Goal 5 is not a coastal goal that is required to be addressed in the limited scope of the Coos Bay Estuary Management Plan, these resources are very important in Coos County and there are no proposed changes to the inventoried sites covered under Goal 5. The plan already incorporates extensive policies and mapped inventories that encompass cultural, historical, botanical, geological, and natural aspects, including wildlife habitats. Policy #3 provides an extensive list of these mapped resources. Importantly, the Plan maintains the integrity of these inventories and policies, ensuring their continued alignment with Goal 5 for the preservation and responsible management of vital resources. As there are no proposed changes or amendment to Goal 5 the plan remains complaint.

- *GOAL 6 AIR, WATER AND LAND RESOURCES QUALITY - This goal requires local comprehensive plans and implementing measures to be consistent with state and federal regulations on matters such as groundwater pollution.*

FINDINGS: While Goal 6 is not a coastal specific goal it plays a crucial role in safeguarding air, water, and land resources. The Coos County Comprehensive Plan extensively covers Goal 6 in Volume 1, Parts 1 and 2. No amendments are requested for this portion of the plan or the Coos Bay Estuary Management Plan, ensuring ongoing consistency in addressing Goal 6 objectives. This approach emphasizes the broader environmental considerations integral to comprehensive planning. Therefore, the plan remains compliant with Goal 6.

- *GOAL 7 AREAS SUBJECT TO NATURAL DISASTERS AND HAZARDS Goal 7 deals with development in places subject to natural hazards such as floods or landslides. It requires that jurisdictions apply "appropriate safeguards" (floodplain zoning, for example) when planning for development there.*

FINDINGS: This request is consistent with Goal 7 – Areas Subject to Natural Hazards. This amendment incorporates a policy to implement the mapping already adopted Coos County this policy is step toward adopted all natural hazards in the review. Prior to the policy the only natural hazard that was incorporated with Flood Hazards. The maps were adopted in 2015 and updated in 2019 and do not need to be updated. Therefore, the update is consistent with Goal 7.

- *GOAL 8 RECREATION NEEDS - This goal calls for each community to evaluate its areas and facilities for recreation and develop plans to deal with the projected demand for them. It also sets forth detailed standards for expedited siting of destination resorts.*

FINDINGS: Goal 8 is not applicable to this update. However, coastal recreational is addressed through uses and activities within a management unit as allowed in Goals 16, 17 and 18. Recreational needs are addressed in Volume I, Part 1 of the Coos County Comprehensive Plan and the estuary plan update does not change any portion of the Goal 8 compliance.

- *GOAL 9 ECONOMY OF THE STATE - Goal 9 calls for diversification and improvement of the economy. It asks communities to inventory commercial and industrial lands, project future needs for such lands, and plan and zone enough land to meet those needs.*

FINDINGS: This request is consistent with Goal 9 – Economic Development. This plan has policies that contribute to a stable and healthy economy through an estuary through estuary depended and related uses. The plans has inventories of areas suitable for increased economic growth and those are shown in uses and activities consistent with Goals 16 and 17. Therefore, the plan is consistent and there are no changes that at this time that will change the consistence with Goal 9.

- *GOAL 10 HOUSING - This goal specifies that each city must plan for and accommodate needed housing types, such as multifamily and manufactured housing. It requires each city to inventory its buildable residential lands, project future needs for such lands, and plan and zone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types.*

FINDINGS: While housing is not mandatory for inclusion in the Coos Bay Estuary Management Plan (CBEMP), certain areas within Urban Growth Areas do allow for various housing types. The upcoming update to the plan will maintain the existing housing types without necessitating a housing analysis, ensuring the plan's ongoing consistency with its established framework. This approach emphasizes the targeted focus of the CBEMP while acknowledging housing considerations in specific zones.

- *GOAL 11 PUBLIC FACILITIES AND SERVICES - Goal 11 calls for efficient planning of public services such as sewers, water, law enforcement, and fire protection. The goal's central concept is that public services should to be planned in accordance with a community's needs and capacities rather than be forced to respond to development as it occurs.*

FINDINGS: This request aligns with Goal 11 – Public Facilities and Services. The proposed amendment does not necessitate changes to the adopted Public Facilities Plan, ensuring compliance with Goal 11 objectives.

- *GOAL 12 TRANSPORTATION - The goal aims to provide "a safe, convenient and economic transportation system." It asks for communities to address the needs of the "transportation disadvantaged."*

FINDINGS: While portions the transportation systems exist in the upland portions of the CBEMP, it's important to note that no changes are proposed to the Transportation System Plan, a distinct element of the Coos County Comprehensive Plan as well as the individual cities. This ensures that the update to the CBEMP does not impact the existing transportation framework outlined in the separate plan.

- *GOAL 13 ENERGY - Goal 13 declares that "land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."*

FINDINGS: There are no proposed changes to the CBEMP that will have any effects of energy. Goal 13 is addressed in Volume I, Part 1 of the Coos County Comprehensive Plan. However, there are portions of Goals 16 and 17 that cover utilities and power generation that are shown as a use and/activity. These have not been modified and remain complaint.

- *GOAL 14 URBANIZATION This goal requires cities to estimate future growth and needs for land and then plan and zone enough land to meet those needs. It calls for each city to establish an "urban growth boundary" (UGB) to "identify and separate urbanizable land from rural land." It specifies seven factors that must be considered in drawing up a UGB. It also lists four criteria to be applied when undeveloped land within a UGB is to be converted to urban uses.*

FINDINGS: This request is consistent with Goal 14 – Urbanization. This will better support decision making related to urbanized areas within the Coos Bay Estuary Plan area and is consistent with Goal 14 located within the Coos Bay Estuary Management Plan. No policies that deal with urbanization were modified and still remain complaint.

- *GOAL 15 WILLAMETTE GREENWAY Goal 15 sets forth procedures for administering the 300 miles of greenway that protects the Willamette River.*

FINDINGS: This Goal is not relevant to Coos County.

- *GOAL 16 ESTUARINE RESOURCES This goal requires local governments to classify Oregon's 22 major estuaries in four categories: natural, conservation, shallow-draft development, and deep-draft development. It then describes types of land uses and activities that are permissible in those "management units."*

FINDINGS: This request is consistent with Goal 16 – Estuarine Resources. Statewide Planning Goal 16 provides the principal guidance for the planning and management of Oregon's estuaries. The Coos Bay Estuary has all elements of the Goal 16. The overall objective of Goal 16 is to "to recognize and protect the unique environmental, economic and social values of each estuary and associated wetlands; and 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". To accomplish this, the goal establishes detailed requirements for the preparation of plans and for the review of individual development projects and calls for coordinated management by local, state, and federal agencies that regulate or have an interest in activities in Oregon's estuaries. The Coos Bay

Estuary Management Plan was originally adopted by the joint local agencies to address Goal 16 requirements as they relate to the Coos Bay Estuary. The plan designates appropriate uses for different areas within each estuary based on biological and physical characteristics and features and provides for review of proposed estuarine alterations to assure that they are consistent with overall management objectives and that adverse impacts are minimized. The updated CBEMP does not change lawfully approved uses or activities within management units, nor change previously approved management unit boundaries. As the update will help Coos County better manage estuarine resources and enhance coordinated management of these resources, this amendment is consistent with Goal 16. The purpose of this update is to create consistency between the three jurisdiction, update the official zone map, digitize the Coos Bay Estuary Management Plan and include elements to make is user friendly to allow for larger updates to be completed. The inventory information will be updated in the future as funding becomes available.

Therefore, the modifications are minor and the plan remains in compliance with Goal 16.

- *GOAL 17 COASTAL SHORELANDS The goal defines a planning area bounded by the ocean beaches on the west and the coast highway (State Route 101) on the east. It specifies how certain types of land and resources there are to be managed: major marshes, for example, are to be protected. Sites best suited for unique coastal land uses (port facilities, for example) are reserved for "water-dependent" or "water related" uses.*

FINDINGS: This request is consistent with Goal 17 – Coastal Shorelands. Goal 17 focuses on the protection and management of resources unique to shoreland areas. Its requirements are implemented primarily through local comprehensive plans and zoning. The update of the Coos Bay Estuary Management Plan is directly related to and in concert with Goal 17, as it is intended to provide up-to-date implementation tools for the local jurisdictions to protect and manage resources within protected shoreland and estuary areas. No exceptions are required to this planning goal for implementation. This amendment is minor and is consistent with Goal 17. There were no changes to uses or activities that are no consistent with Goal 17.

- *GOAL 18 BEACHES AND DUNES Goal 18 sets planning standards for development on various types of dunes. It prohibits residential development on beaches and active foredunes, but allows some other types of development if they meet key criteria. The goal also deals with dune grading, groundwater drawdown in dunal aquifers, and the breaching of foredunes.*

FINDINGS: This request is consistent with Goal 18 – Beaches & Dunes focuses on conserving and protecting Oregon's beach and dune resources, and on recognizing and reducing exposure to hazards in this dynamic, sometimes quickly changing environment. Goal 18 is central to the work of coastal communities in addressing the impacts of coastal hazards and climate change in areas along the ocean shore. Local governments are required to inventory beaches and dunes and describe the stability, movement, groundwater resources, hazards and values of the beach, dune, and interdune areas. Local governments must then apply appropriate beach and dune policies for use in these areas. Goal 18 prohibits development of the most sensitive and hazardous landforms in the beach and dune environment, limits the placement of beachfront protective structures, and specifies detailed

requirements for foredune grading. The adoption of the updated 2023 Coos Bay Estuary Management Plan will enhance the implementation and functionality of this document, which is the primary tool used to ensure compliance with Goal 18 within the Coos Bay Estuary. No modifications are proposed to management units, nor to policies related to beach and dune environments. New mapping will, however, better assist local governments with evaluating proposals for work within these sensitive areas. This amendment is hence consistent with Goal 18.

- *GOAL 19. OCEAN RESOURCES Goal 19 aims "to conserve the long-term values, benefits, and natural resources of the nearshore ocean and the continental shelf." It deals with matters such as dumping of dredge spoils and discharging of waste products into the open sea. Goal 19's main requirements are for state agencies rather than cities and counties.*

FINDINGS: This request is consistent with Goal 19 – Ocean Resources. Statewide Planning Goal 19 addresses matters related to open ocean resources and aims "to conserve the long-term values, benefits, and natural resources of the nearshore ocean and the continental shelf." It outlines state interest in conserving resources within the [Ocean Stewardship Area](#), which includes Oregon's territorial sea out to 3 nautical miles as well as the continental margin seaward to the toe of the continental slope, and adjacent ocean areas. The Coos Bay Estuary Management Plan implements Goal 19 through policies relating to dredging, management of development, and management of non-renewable resources along the coastal shore. No policies related to Goal 19 are being amended with this update. This amendment is consistent with Goal 19