



Oregon Shores
Conservation Coalition



Rogue
Climate

Friday, December 22, 2023

TO:

Jill Rolfe, Coos County Community Development Dep., planning@co.coos.or.us
Chelsea Schnabel, Coos Bay Community Development Dep. cschnabel@coosbayor.gov
Derek Payne, North Bend Planning Dept., dpayne@northbendcity.org

RE: Staff Report for Jan 10th Joint Work Session on the Coos Bay Estuary Management Plan

Greetings,

Rogue Climate and Oregon Shores Conservation Coalition are two organizations with operations based in Coos Bay. We have been commenting on and supporting community engagement in the phase 1 Coos Bay Estuary Management Plan update process. Our joint organizations appreciate the substantial work that was done to offer a robust staff report since the latest work session on December 7th.

We respect the request that comments on the CBEMP draft be made by January 3, 2024, to allow staff and decision-makers adequate time to address public concerns. However, the timing of the written comment deadline is too quick of a turn-around after the holiday season, and the staff report contains too many new materials for the public to review and comment on meaningfully.

We request a comment deadline extension to allow our organizations and South Coast community members more time to engage with this important comment period. We will make every effort to get comments in by the deadline, but given the quick turn-around, this might result in new information being shared in oral testimony at (or after) the next Joint Work Session. Inadequate time to review materials may also lead to further public confusion about the plan amendments being made at this stage.

We would like to address any concerns while we are still in the Joint Work Session period, so that all parties are in full understanding-and in support of-plan adoption when individual jurisdictions hold their hearings.

We hope you can meet this request, for the benefit of the public and the process as a whole. Thank you again for your efforts to improve the plan and address public concerns.

Sincerely,

Ashley Audycki
South Coast Coordinator
Rogue Climate

Annie Merrill
Ocean and Estuaries Manager
Oregon Shores Conservation Coalition

Amy Dibble

From: Annie Merrill <annie@oregonshores.org>
Sent: Tuesday, January 2, 2024 6:33 PM
To: Planning Department; Chelsea Schnabel; Derek Payne
Cc: Ashley Audycki
Subject: Re: Staff Report for Jan 10th Joint Work Session
Attachments: CBEMP Extension Request (1).pdf

This Message originated outside your organization.

Thanks Jill,

I appreciate you taking the time to respond to my questions over the holidays. I'm still a little confused on a couple of points, and I'm again hoping to get more clarification so I can provide meaningful comments:

-Where are all the maps outlined in Table 1, 2, 3, and 4? [Most the maps shown on the website](#) are now considered "Generalized Digital Maps", not for regulatory purposes. So is there a way for the public to see the specific maps mentioned in Table 1 that are indeed regulatory?

-When you said "The County Ordinance requires that you provide proof of representation prior to the close of the record in the matter," specifically what do you mean by "proof of representation"? Do I need to provide a pay stub showing I work for Oregon Shores? Do I need the Executive Director to write a letter confirming I am in fact representing the organization in my comments?

-Again, what specifically is the "criteria for legislative amendments" on which the public is supposed to focus comments? There is a lot of content to comment on, and we want to be sure to comment on the most relevant parts for the purposes of a productive work session.

-Last, the newest iteration of the CBEMP specifically references the CBEMP plan and map adoption will be on January 10th, 2024 (for example, Table 2, in Volume II Part 1, Section 4, Page 29). Does that mean the upcoming hearing on January 10th is intended to be a full vote and adoption of the CBEMP? It was indicated at the last work session in December that the hearings will be to adopt the resolution, not the entire plan. Or did I get this wrong?

I know you are on vacation, so maybe Chelsea or Derek can chime in?

Last, this may have been missed in my original email, but please see the attached joint letter from Oregon Shores and Rogue Climate requesting an extension for the written comment period. This is particularly important if the Jan 10th hearings are intended to be a final vote on the adoption of the CBEMP.

Happy New Years to all of you, and thank you again.

Annie Merrill

On Tue, Dec 26, 2023 at 11:12 AM Planning Department <Planning@co.coos.or.us> wrote:

Hello,

Currently, I am on vacation and checking email as time permits.

Policy 3 clearly distinguishes between regulatory digitized maps and non-regulatory digitized maps.

The tool implemented in Policy 3 assists planners in determining the applicable mapping information for a property. However, it was never intended to serve as a substitute for regulatory Mylar maps. The only map that is requested to use in lieu of a Mylar map is the one that replaces Map 34—the official zone map. The others, which have been generated from Mylar data, will remain as a tool. This decision aligns with testimony that has repeatedly requested for more time to confirm the data, as indicated in the provided text screenshot.

Table 1 comprises all the current Mylar Maps, Table 2 represents the one digitized map that will become regulatory (while retaining the Mylar map for historical purposes), Table 3 includes other digitized layers as part of the request for additional review time, and Table 4 showcases the work that has been done and will be incorporated in a future update.

Table 2 – Regulatory Digitized Detailed Plan Maps

Map Number	Title	Date of Adoption
34	Coos Bay Estuary Management Plan	January 10, 2024

Table 3 - Nonregulatory Digitized Inventory Maps used as a tool but not a substitute for the original Plan Map (Map Scale 1" = 40,000')

Map Number	Title
15	Shoreland Values Requiring Mandatory Protection (without Archaeological or Historical sites due to protected information)
16	Beaches and Dunes
17	Beaches and Dunes: Development Potential
29	Goal #16 "Linkage" Matrix
30	Aquatic Uses and Activities "Linkage" Matrix
31	Goal #17 and #18 "Linkage" Matrix

Table 4 is explicitly labeled to be considered in a future update and for general information. The intention is to safeguard the efforts invested in the map and data creation, but it's crucial to acknowledge that these tables are not intended for regulatory purposes. I can add a statement after words if you find it necessary, that states "not for regulatory purposes".

Table 4 – Map Atlas - Generalized Digital Maps (Map Scale 1" = 40,000') Part of the Map Atlas that should be considered for Future Updates and General Information.

Maps Number	Title
3.1	Generalized Zoning
3.2	Management Units
3.3	Property Use Classification
4.1	Improvement Status
4.2	Improvement Value Ratio
4.3	Public Ownership

The County Ordinance requires that you provide proof of representation prior to the close of the record in the matter.

The criteria for legislative amendments have been the regulatory requirement and were addressed in the individual staff reports that were originally provided to Council and the Board of Commissioners. The work sessions were intended to address some of the technical issues that arose after the County Planning Commission made a recommendation in Section 2 as well as some of the comments that were made about mapping.

Thank you for reviewing and let me know if you additional questions. Again, I will be checking email throughout this time period.

Thank you,

Jill Rolfe, Director

Coos County Community Development

250 N. Baxter

Coquille OR 97423

541-396-7770

planning@co.coos.or.us



From: Annie Merrill <annie@oregonshores.org>

Sent: Friday, December 22, 2023 12:47 PM

To: Planning Department <Planning@co.coos.or.us>; Chelsea Schnabel <cschnabel@coosbayor.gov>; Derek Payne

<dpayne@northbendcity.org>

Cc: Ashley Audycki <ashley@rogueclimate.org>

Subject: RE: Staff Report for Jan 10th Joint Work Session

This Message originated outside your organization.

Hi Jill, Chelsea, and Derek,

Thanks for sending out the staff report for the January 10th meeting on the CBEMP. See our attached joint letter response on the materials thus far.

Additionally, we have a couple of clarifying questions, and I'm hoping you can help us understand the below points, so that we can provide useful and accurate comments:

-Regarding Baywide Policy 3 language, we are hoping you can help us understand what the goal is with the latest changes. On Page 29 (PDF page 81) there's reference to digitized information from mylar maps, but Table 4 references the Map Atlas, which as we understand it, contains new information. Will that Map Atlas information have regulatory significance under this plan amendment, or is its purpose just "general information"? Can this new resource information be applied in considering application materials without the Map Atlas being adopted? Is the new Map Atlas expected to be adopted at this point?

-Additionally, on page 20 of the staff report, a statement reads: "It's crucial to provide proof of representation for organizations or groups when offering testimony or the testimony may be stricken from the record." Is there an expectation that representatives from organizations, such as Ashley (Rogue Climate) and I (Oregon Shores) identify ourselves in a different manner than we have been during public comment and testimonies?

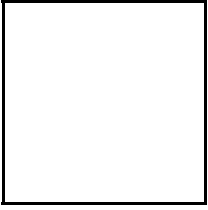
-Last, we seek clarity on the specific "criteria for a legislative plan amendment" (page 20 of staff report), on which the public is asked to focus comments. Does the criteria refer to the entire staff report? Statewide planning goals? Or the A-H Goals for the current CBEMP update (listed on pages 1-2)? Clarifying this will be crucial if you are to receive the targeted comments you request.

If you would like to schedule a meeting with us to discuss and clarify the above items, it might help us all get on the same page and avoid any misunderstandings in advance of the public hearings. Please let Ashley and I know if that's something you are interested in.

Again, thank you so much for all your hard work. We are genuinely hoping to see this plan adopted in the near future.

Happy holidays to all,
Annie Merrill

--



Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).





Oregon Shores
Conservation Coalition



**Rogue
Climate**

Friday, December 22, 2023

TO:

Jill Rolfe, Coos County Community Development Dep., planning@co.coos.or.us
Chelsea Schnabel, Coos Bay Community Development Dep. cschnabel@coosbayor.gov
Derek Payne, North Bend Planning Dept., dpayne@northbendcity.org

RE: Staff Report for Jan 10th Joint Work Session on the Coos Bay Estuary Management Plan

Greetings,

Rogue Climate and Oregon Shores Conservation Coalition are two organizations with operations based in Coos Bay. We have been commenting on and supporting community engagement in the phase 1 Coos Bay Estuary Management Plan update process. Our joint organizations appreciate the substantial work that was done to offer a robust staff report since the latest work session on December 7th.

We respect the request that comments on the CBEMP draft be made by January 3, 2024, to allow staff and decision-makers adequate time to address public concerns. However, the timing of the written comment deadline is too quick of a turn-around after the holiday season, and the staff report contains too many new materials for the public to review and comment on meaningfully.

We request a comment deadline extension to allow our organizations and South Coast community members more time to engage with this important comment period. We will make every effort to get comments in by the deadline, but given the quick turn-around, this might result in new information being shared in oral testimony at (or after) the next Joint Work Session. Inadequate time to review materials may also lead to further public confusion about the plan amendments being made at this stage.

We would like to address any concerns while we are still in the Joint Work Session period, so that all parties are in full understanding-and in support of-plan adoption when individual jurisdictions hold their hearings.

We hope you can meet this request, for the benefit of the public and the process as a whole. Thank you again for your efforts to improve the plan and address public concerns.

Sincerely,

Ashley Audycki
South Coast Coordinator
Rogue Climate

Annie Merrill
Ocean and Estuaries Manager
Oregon Shores Conservation Coalition