

From: [Steve Miller](#)
To: [Planning Department](#)
Subject: CBEMP Phase 1 Update, public comment
Date: Monday, February 20, 2023 7:53:11 AM
Attachments: [CBEMP Phase 1 comments to J. Rolfe.docx](#)

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To Attn. of: Jill Rolfe, Planning Director - Coos County, Oregon
Regarding: Thanks and my comment on the Coos Bay Estuary Management Plan Update

Dear Ms. Rolfe,

Please find attached my comments after my participation to date in the Phase 1 CBEMP Update.
Thank you,

Steve Miller
1556 N. 20th St.
Coos Bay, OR 97420

20 Feb., 2023
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Dear Ms. Rolfe,

I was pleased to hear Coos County is starting-up work again on Phase I of the long-needed comprehensive update of the Coos Bay Estuary Management Plan. However it appears this work began somewhat abruptly, without a prior announcement the update process would begin and approximately when that would occur. The time allowed to complete the Phase I work on updating data labels and mapping information also seems very short and more related to the work-period allowed to complete the U of O office's contract in support of Coos County's update process---rather than a careful process to produce the most credible result of high value.

To produce the most useful Phase 1 results I feel use of the latest resource surveys or initiation of surveys where necessary, are required to produce current, reliable data and maps. Also, recognizing a need to thoroughly involve county citizens' participation in the CBEMP process and providing broad opportunities to do that, will better reflect values citizens hold for the Coos Bay Estuary now and looking to the future. As a County resident it was frustrating that some of the maps presented at the two public events I attended were very difficult to read and did not produce useable information.

I offer some more specific observations and concerns with the online maps in the County Map Atlas and as the two public events I attended. Many of the online maps I viewed became soft or pixelated when zooming in for close inspection of details. This was of particular concern on Map 3.2, depicting estuary Management Units. With only slight enlargement done to get a close definition of boundaries of management units, map features and unit boundaries became soft or smudged and practically unusable. Copies of the maps at the two public displays I attended were just slightly better.

Some resource data appeared to be dated (2012, 2015) and not as useful as necessary. I also think having the maps in this set reviewed by qualified specialists in fields related to those map topics would give assurances of the maps' credibility and usefulness.

The color-coding selected for several of the CMECS maps, particularly the CMECS Biotic, Map 5.12 was virtually useless. The color gradations were so slight for 5-7 of the items color coded, as to make identification of a species and its distribution unreliable or often impossible. Also, the fact that the status of eelgrass, generally declining locally, would be monitored only infrequently, ignores current science on this species showing its distribution and frequency can vary significantly over relatively short time spans.

CMECS Map 5.14, Geologic Substrate was another map in the set using color gradations so difficult to differentiate as to make location and distribution of many substrate types on this map impossible. Marine scientists report that bedrock was encountered at numerous locations

during surveys for the last deepening of the navigational channel in the late 1990's and for the more recent Jordan Cove projects. Though there is a color code in the map legend for bedrock, no bedrock is identified on the CMECS Map 5.14. Data from those sources should reasonably be consulted and any pertinent findings included as data to re-work the Geologic Substrate Map.

The two wetlands surveys (Maps 5.6, National Wetlands Inventory and Map 5.7, Local Wetlands Inventory) represented in the Map Atlas were concerning because of the unexplained, widely divergent findings of the data from which these two maps were produced. A new peer-reviewed inventory, using current respected methodology appears necessary to gain clarity and certainty that a map product is an accurate, reliable representation.

Thank you again for re-starting the long-needed updates for the Coos Bay Estuary Management Plan! I'm grateful to have taken opportunities that I learned of to become informed about the process and contents of this Phase I of the CBEMP update--- though I am disappointed that most citizens I have talked with about it were simply unaware it was ongoing. Also, the time allowed for the update does seem quite rushed.

Please enter my observations and comments into the record of public participation in the CBEMP process and to hopefully improve the Phase 1 product. I also look forward to the next Phase of this process that can complete a comprehensive new EMP for Coos Bay.

Steve Miller
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