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Thursday, September 28, 2023

TO:

Coos County Planning Commission, % Jill Rolfe, jrolfe@co.coos.or.us

Amanda Ferguson, Institute for Policy Research and Engagement, afergus4@uoregon.edu

RE: AM-22-005 Coos Bay Estuary Management Plan, Coos County Planning Commission

Greetings,

Rogue Climate is a climate justice organization based in Southern Oregon with an office in downtown Coos Bay. We have been participating in commenting on the Coos Bay Estuary Management Plan (CBEMP) update process since the opportunities started in March because it is a critical step for ongoing planning for the mitigation and adaptations of climate change impacts, and for the protection of one of the largest estuaries in Oregon and its foundation of the community's economic development and cultural practices.

We appreciate the opportunity to comment and submit at this time our previous comments (including referenced documents) which raise substantial challenges to the process, to the characterization of what you are asked to decide, and otherwise demonstrate that you should not move forward with a recommendation for adoption. With apologies, the comments will appear redundant because we have not yet received appropriate responses but each of these should be presented to you as part of this record. They demonstrate the process problem. We will submit additional comments before the hearing.

For the reasons stated in the attached comments and records, we ask that you direct staff to convene and conduct several public hearings over the next several months so that the public may meaningfully participate in these proceedings and learn, with you, why each of the amendments are proposed and the effect they will have on the operation and enforcement of the CBEMP.

Sincerely,

Ashley Audycki
South Coast Regional Coordinator, Rogue Climate
ashley@rogueclimate.org



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Tuesday, July 25, 2023

TO:

Coos Bay Planning Commission, % Chelsea Schnable, cschnabel@coosbay.org
Amanda Ferguson, Institute for Policy Research and Engagement, afergus4@uoregon.edu

RE: AM-22-005 Coos Bay Estuary Management Plan, Coos Bay Planning Commission

Greetings,

Rogue Climate is a climate justice organization based in Southern Oregon with an office in downtown Coos Bay. We have been participating in commenting on the Coos Bay Estuary Management Plan (CBEMP) update process since the opportunities started in March because it is a critical step for ongoing planning for the mitigation and adaptations of climate change impacts in Coos County. The Coos Bay Estuary is one of the largest estuaries in Oregon, and it is home to the largest population along Oregon's coastline. The Coos Bay Estuary is the foundation of the community's economic development and cultural practices.

Time and Accessibility for Material Review

The CBEMP update process is no easy feat since the plan hasn't had significant updates during its 40 years of inception, and the proposed amendments include well over 1800 pages. We ask for jurisdictions such as Coos Bay to continue the update proceedings to enable sufficient time and opportunity for the public to review with staff each of the proposed changes to the management units and the content of the new data being adopted - Appendix A maps and the Data Source. The record did not describe the rationale and factual basis for amending the management units (which are being amended) and adopting the data and maps, so this review is needed.

We acknowledge that there have been a few public house events but this has not been sufficient to answer our questions. We learned at the last Coos Bay Planning Commission hearing that commission members may also not understand the proposed amendments' scope. We have reason to believe that many of the planning commissioners in the three jurisdictions are worried that they are not fully informed about the update materials. We ask for at least 2 – 3 meetings for decision makers and the public to be walked through those 1800 pages of



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documents in a methodical fashion aimed at explaining the management unit changes and how the new data is incorporated into the regulatory system if it is.

[We attach our previous comments](#) and ask that all comments received since January to any of the jurisdictions be submitted to you and placed into this record. We believe that all unfiltered comments be included in the docket, including comments received from the solicitation to the state agencies. We believe that most of the questions we have asked have not been answered sufficiently; saying that now is not the time or the issue is not in the “scope of phase 1” is not satisfactory. We ask that you ask if the current CBEMP citizens advisory committee has had an opportunity to review the proposed amendment, and if not, why not. We hope that additional public hearings could cure this failure. Otherwise, we object to the process and believe that Goal 1 has yet to be satisfied.

Public Engagement and the Citizens Advisory Committee

In our recent previous comment, [we submitted a robust recommendation](#) for a Citizens Advisory Committee (CAC) that is to be reflective of the communities that depend on the livelihood of a healthy bay, rather than stakeholders who are already part of the update process as participating jurisdictional decision makers or technical experts. There are concerns that the current Citizens Advisory Committee proposed by the County does not fully consider equitable and meaningful community representation.

There has not been an active CAC for the CBEMP, and the usage of groups such as the Partnership for Coastal Watersheds (PCW) for a fill-in CAC does not fulfill the requirements under CBEMP 1.5 as it is required to represent the broad geographical areas of the county and varied interests related to land use. The Partnership for Coastal Watersheds includes representatives from local governments already a key jurisdiction in the CBEMP update process with little community at-large representation. CBEMP 2.2 – 2.4 further discusses citizen involvement; it states that citizens “shall” have the opportunities and be involved in “all phases” of updating the CBEMP and implementing measures. And the CAC “shall aid ... staff..., as well as to voice concerns and/or support revisions and updates. initiated by the ... staff, before public hearings and determinations at the Planning Commission and Board of Commissioners level.” The plan lists code section 1.4, which further states that the CAC consists of 7 members



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of diverse profession backgrounds. As we discussed, an amendment process that includes the CAC looks drastically different from this current update process.

While there have been mentions of outreach to the public, this record does not contain any public notices, agendas demonstrating an opportunity to comment, published materials for any meeting, or any meeting minutes describing any comments. The available record lacks legislative history – testimony/comments from even the PCW, targeted outreach meetings to agencies, focus groups of experts, or even the “public open house” for the “broader community.” There is no record of public participation, let alone CAC engagement. There has been confusion from jurisdictions about the current timeline of the hearings process when Coos County shifted dates just two days before the initial Coos County Planning Commission public hearing. In direct correspondence with Coos County Planning Staff about communications of new dates, they would not do any other public outreach since they submitted the required public notice for the original dates. We urge all three jurisdictions to continue public outreach and send out updated notices for continued opportunities to testify.

We attach the [record index from one of the last minor amendments in 2018 that were appealed to LUBA](#) which demonstrates how this amendment should have been presented according to a plain reading of the plan and historical practice. It shows the CAC met a few times and the Planning Commission met several times to consider the amended language and the meeting packets and minutes of the meetings, including comments from the public made at those meetings, were included in the record. Again, we urge you to ask staff to correct this error and convene a series of meetings at which the planning commission and the public can be apprised and have the opportunity to comment upon all of the changes proposed for adoption. In total, the documents being adopted/amended include 1800 pages, some of which were amended in early May.

Tribal Sovereignty

Tribal governments and their representatives must be acknowledged as sovereign nations in legislative land use planning generally and especially in estuary planning like this one, including committees that we recommend such as the Citizens Advisory Committee, Adhoc Committee, and a Technical Advisory Committee rather than as a stakeholder. The inclusion of representatives from the Coquille Indian Tribe and Confederated Tribes of the Coos, Lower



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Umpqua, and Siuslaw Indians is critical for recognizing the value of Tribal sovereignty. Additionally, consultation with Tribal governments still needs to happen outside of these committee spaces. In each of the committees that are created, Indigenous wisdom should be recognized equitably alongside scientific wisdom as the Hanis Coos, Miluk Coos, and Coquille peoples are the original stewards of the Coos Bay estuary and have been since time immemorial. Concerns and comments from Tribal representatives should be uplifted and thoughtfully considered during update processes and the ongoing management of the CBEMP.

Port of Coos Bay Representation

There are serious concerns about the inclusion of the Port of Coos Bay on the CAC and various committees. It appears that the Port has been elevated to apparent equal status with the three land use regulating jurisdictions, and this is not legally correct and has not been explained. The staff has acknowledged that the Port is and has been a partner agency like other governmental agencies on the steering committee since adopting the CBEMP, begging the question of why it is being treated differently now. The Port of Coos Bay has no jurisdiction to enact land use regulations. The amendment appears to attempt to elevate “plans” developed by the Port into the CBEMP in some way. This would seem to run afoul of applicable state and local land use regulations. The jurisdictions do planning through their comprehensive plan and regulations. There should be no confusion or intended attempt to make operable current or future plans by the Port without the Port utilizing the application process. In addition, with the Port’s involvement with the passage of [HB 3382](#) and intent to submit one of the largest dredging applications in Oregon’s history, the Port should not be included on the prospective CAC. It should remain a coordinating agency only and have no elevated proprietary rights unless the community decides otherwise through the Phase 2 CBEMP update.

Clarity of Goals for the Phase 1 Update Process re: Management Units

As our previous comments discuss, there is a lack of clarity about what is being accomplished in the Phase 1 update. The goals of digitization and unification ahead of the Phase 2 significant amendment is great, but that is not what is proposed. It is stated that there are no zone designations that have been modified. One needs only a page through the document to see redlining in the management units.



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While the boundaries of the management units remain the same, there are numerous substantive management unit amendments to the allowed uses and activities.

It is said the units are being “edit[ed] ... to bring alignment between the jurisdictions.” This is an incorrect and erroneous exercise and is further discussed below. The point here is that what is being stated is that the management unit amendments are procedural, but that does not make them non-substantive when they are adding allowable uses and activities.

It is also unclear why the maps and data sources are being adopted when the matrices are not being updated, and it is said that Phase 2 will be when the substantive changes to the management units will occur. The maps and data source are not intended to be implemented, begging the question, why are they being adopted?

Turning back to the purpose of “alignment between jurisdictions,” as understood, the problem is characterized as landowners with land in more than one management unit deserving “consistency” in implementation. That can hardly be a problem, but it also does not reflect the intent and policy of the CBEMP. Each management unit is uniquely positioned in the estuary; each has different adjacent management unit use impacts. Thus, an amendment in one management unit may be justified under the applicable criteria does not mean that it would be justified in other similarly designated management units. It should be expected that through periodic review every ten years, those changes would be evaluated holistically and appropriate changes made in other jurisdictions’ management units where there is a public interest in doing so, not as a matter of rote application. This would be the work for Phase 2 as described to us. Any such reconciliation must demonstrate compliance with the Goals on a case-by-case or management unit-by-management unit basis. That is not presented here, so the “edits” to the management units for alignment should be rejected, outright.

Conclusion

In closing, the main takeaway should be that the commissions and the public need to understand what is being proposed and why. If only digitization and unification is the goal, neither the additional (already outdated maps), the “data source”, or any amendment to any management unit should be adopted. If more than that is what is proposed, the public needs to have its opportunities to be involved “in all phases” of updating the CBEMP. See current Section 2.4. This violation could be mitigated by doing now what should have been done earlier



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- convene public meetings and go through the proposal methodically. Otherwise, it should be rejected or modified to be an amendment that is not a minor amendment but is merely a codification/digitization of what was adopted in 1985.

We also want to reinforce that there needs to be a robust and equitable representation of the community on the Citizens Advisory Committee. Jurisdictions that already have a critical role in decision-making should also not be representing the various users that depend on a thriving Coos Bay Estuary. Our previous recommendations for a Citizens Advisory Committee, Technical Steering Committee, and Adhoc Steering Committee are listed below. Stakeholders such as the Port of Coos Bay should not hold committee roles that share a direct conflict of interest. While Tribal governments and their representatives need to be treated as sovereign nations, with meaningful Tribal consultation being an integral part of recognizing and uplifting concerns in regard to the CBEMP update.

Our recommendation for the makeup of a **Citizens Advisory Committee** include:

- 1- Community member at large representative appointed by Coos County Board of Commissioners
- 1- Community member at large representative appointed by Coos Bay City Council
- 1 -Community member at large representative appointed by North Bend City Council
- 1- Tribal community member at large representative appointed by the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians
- 1- Tribal community member at large representative appointed by the Coquille Indian Tribe
- 1 - Commercial or sport fishing industry representative
- 1 - Aquaculture or seafood processing representative
- 1- Public health or social services representative
- 1- Recreation or tourism representative
- Representatives from rural communities, lower-income communities, communities of color, and youth should be prioritized

Our recommendation for the makeup of a **Technical Advisory Group** include:

- 1- representative from the South Slough National Estuarine Research Reserve
- 1- representative from the Coos Watershed Association
- 1- representative from the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians Natural Resources staff



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- 1- Tribal government representative appointed by the Coquille Indian Tribe Natural Resource Staff
- Representatives from other academic institutions including Oregon Institute of Marine Biology and Southwestern Oregon Community College
- Representatives from other conservation organizations including the Partnership for Coastal Watersheds, Wild Rivers Land Trust, and Coast Range Forest Watch
- Representatives from fishing and aquaculture industry

Our recommendation for the makeup of an **Ad Hoc Steering Committee** include:

- 1- Tribal government representative appointed by the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians
- 1- Tribal government representative appointed by the Coquille Indian Tribe
- 1- Coos Bay City Council representative
- 1- Coos Bay Planning Commission representative
- 1- North Bend City Council representative
- 1- North Bend Planning Commission representative
- 1- Coos County Board of Commissioners representative
- 1 - Coos County Planning Commission representative
- 1- Port of Coos Bay representative

Thank you for the opportunity to make a comment in the ongoing Coos Bay Estuary Management Plan process. We hope that the City of Coos Bay Planning Commission will advocate for a comprehensive update in the near future.

Sincerely,

Ashley Audycki
South Coast Regional Coordinator
Rogue Climate
ashley@rogueclimate.org

Referenced Documents

Index from LUBA Appeal of 2018 Amendment

**BEFORE THE LAND USE BOARD OF APPEALS
OF THE STATE OF OREGON
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1. September 6, 2018 Audio Recording
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*Note: minutes are in draft form pending signatures not available by due date of record.

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Other items provided with this record:

1. February 14, 2018 Audio Recording
2. March 25, 2018 Audio Recording
3. March 1, 2018 Audio Recording
4. April 5, 2018 Audio Recording (only second portion of audio included)
5. May 3, 2018 Audio Recording
6. June 13, 2018 Audio Recording
7. July 5, 2018 Audio Recording
8. August 2, 2018 Audio Recording

*Note: minutes are in draft form pending signatures not available by due date of record.

The September date referenced in Ordinance # No. 18-009PL was the first reading of the ordinance by title before the Planning Commission. The minutes from that meeting can be found at page 286 of the original record.

The certificate of service can be found as the last item of part two 2 of the supplemental record.

May 26, 2023 Comments



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Friday, May 26, 2023

TO:

Jill Rolfe, Community Development Director at Coos County Community Development & Planning Department, jrolfe@co.coos.or.us

Amanda Ferguson, Institute for Policy Research and Engagement, afergus4@uoregon.edu

Coos County Planning Commission, % Jill Rolfe, jrolfe@co.coos.or.us

North Bend Planning Commission, % Derek Payne, dpayne@northbendcity.org

Coos Bay Planning Commission, % Chelsea Schnabel, cschnabel@coosbay.org

Coastal Zone Management Program at Department of Land Conservation and Development, %

Lisa Phipps, lisa.phipps@dlcd.oregon.gov, & Hui Rodomsky, hui.rodomsky@dlcd.oregon.gov

RE: AM-22-005 Coos Bay Estuary Management Plan

Greetings,

Thank you for the opportunity to provide comment, and for your work updating the Coos Bay Estuary Management Plan (AM-22-005).

Rogue Climate is a climate justice organization whose mission is to empower Southern Oregon communities most impacted by climate change including low-income, rural, youth, seniors, and communities of color to win climate justice by organizing for clean energy, sustainable jobs, and a healthy environment. We do so through leadership development, political education, fostering conversations, and campaigns for policies that benefit our communities over the special interests of the largest corporations.

We worked alongside community members in Coos County to help defeat the formerly proposed Jordan Cove LNG Export Terminal and Pacific Connector fracked gas pipeline that would have forever impacted the Coos Bay estuary's natural and cultural resources. During the local permitting process for that project, we learned from community members how important the Coos Bay Estuary Management Plan (CBEMP) is for managing the natural, cultural, and developmental uses of the Coos Bay estuary. The CBEMP was significantly challenged during that complex land use process and showcased the vulnerability of having a management plan that has not been properly updated in 40 years. Recent legislative challenges such as [HB 3382](#) illustrate that it is crucial that the Coos Bay Estuary Management Plan is properly updated to reflect the communities' goals in consideration of major changes over the 40 years. It is



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imperative that the community be engaged as soon as possible to determine which industries should use the bay, which technologies may be allowed to develop, and more.

The need for a Comprehensive CBEMP Update:

Rogue Climate strongly supports a comprehensive update of the Coos Bay Estuary Management plan to follow Phase 1. A comprehensive update of the Coos Bay Estuary Management Plan is critical not only for navigating potential developmental proposals, but also in planning for climate adaptations. Climate change is increasingly impacting the South Coast, as evidenced by the recent heat wave in May 2023. Estuaries are an essential climate solution that help coastal communities mitigate impacts such as sea level rise, ocean acidification, flooding, and more. The same consultants from Institute for Policy Research and Engagement working on this current update also led a series of interviews, surveys, and focus groups in 2022, and issued [a report addressing the climate vulnerability and adaptation needs of communities along the Coos Bay Estuary Management Plan boundary zone](#). As climate change continues to impact the estuary and the communities that depend on it, the CBEMP should reflect the changes that are already happening to the estuary and plan for adaptation, mitigation, and future hazards. The comprehensive CBEMP update - Phase 2 - is an essential step towards preparing Coos County to be resilient in the face of climate change. We urge you to ensure a comprehensive Phase 2 update moves forward.

Public Engagement and The Citizens Advisory Committee

One of the acknowledged substantive changes presented is related to statewide planning goal 1 policy: Public Engagement. We understand that one of the core update elements of public engagement during this current phase is setting the stage for a comprehensive update is the structure of a Citizens Advisory committee as well as the creation of Technical Advisory Committee and Ad-Hoc Steering Committee. We strongly advocate for the make up of these various committees to be reflective of the communities that depend on the livelihood of a healthy bay, rather than stakeholders who are already a part of the update process as participating jurisdictional decision makers.

There are many local community members who have an expertise in relevant industries, including maritime, fishing (commercial and sport), recreation, conservation, tourism, aquaculture and many more. These are the types of expertise and lived experiences that need to be prioritized on this committee over the positions such as elected and appointed officials who are ultimate decision makers on the plan. Those decision-making entities should be included in the process via an Ad-hoc Steering Committee with representatives from Tribal



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governments, planning commissions, city councils, and the Port of Coos Bay, not as participants of the Citizens Advisory Committee. The Citizens Advisory Committee” should reflect the expertise and lived-experience of the community.

Our recommendation for the makeup of a **Citizens Advisory Committee** include:

- 1- Community member at large representative appointed by Coos County Board of Commissioners
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- 1- representative from the South Slough National Estuarine Research Reserve
- 1- representative from the Coos Watershed Association
- 1- representative from the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians Natural Resources staff
- 1- Tribal government representative appointed by the Coquille Indian Tribe Natural Resource Staff
- Representatives from other academic institutions including Oregon Institute of Marine Biology and Southwestern Oregon Community College
- Representatives from other conservation organizations including the Partnership for Coastal Watersheds, Wild Rivers Land Trust, and Coast Range Forest Watch
- Representatives from fishing and aquaculture industry

Our recommendation for the makeup of an **Ad Hoc Steering Committee** include:

- 1- Tribal government representative appointed by the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians



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- 1- Coos Bay City Council representative
- 1- Coos Bay Planning Commission representative
- 1- North Bend City Council representative
- 1- North Bend Planning Commission representative
- 1- Coos County Board of Commissioners representative
- 1 - Coos County Planning Commission representative
- 1- Port of Coos Bay representative

In each of the committee spaces that are created for the management of the CBEMP, it is crucial that Tribal governments and representation are acknowledged as a sovereign nation and are not considered as a stakeholder. The inclusion of representatives from the Coquille Indian Tribe and Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians is critical for recognizing the value of Tribal sovereignty and that consultation with Tribal governments still needs to happen outside of these committee group spaces. In each of the committee groups, indigenous wisdom should be recognized equitably to scientific wisdom as the Hanis Coos, Miluk Coos, and Coquille peoples are the original stewards of the Coos Bay estuary and have been since time immemorial. Concerns and comments from Tribal representatives should be uplifted and thoughtfully considered during update processes and the ongoing management of the CBEMP.

Clarifying information and data pertaining to the Phase 1 CBEMP update:

From our understanding, this current comment period is for the Phase 1 update, which is limited in scope, primarily making the CBEMP document more user-friendly - digitized.¹ We understand the importance of making structural updates such as converting the hand-drawn and mylar maps into a digitized format, and hyperlinking the textual document. We urge you to ask the planners to treat only those portions of the CBEMP that constitute a plan amendment as subject to the post acknowledgment amendment proceeding. This will help clarify what staff believes is a substantive amendment and what is merely a structural/digitizing reformatting.

¹ The May 1, 2023 memo from Mike Howard and Amanda Ferguson states that no management unit zone designations have been modified. It also says that the matrices have not been changed. It also says that Appendix A, the regulatory inventory maps were originally developed for the 1985 CBEMP adoption and others have been digitized. Yet, the memo also states that Historic Inventory maps - Appendix C - are “proposed for adoption” and that they “remain in use **as a reference** during development review.” Are the 1985 maps in appendix A that are now digitized not operable but only to be used as reference?



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We are concerned that this Phase 1 process does not address outdated data. As understood, the maps in Appendix A are the 1985 maps, and even if they contain new data, that new data is not being implemented through substantive plan changes. The [May 1, 2023 Staff memo](#), however, states that the [Data Source \(identified as “background” in the AM 22-05 file\)](#) contains new information and that that information has been included in the revised CBEMP Part 2. Yet, that does not appear to be the case. Looking at the Part 2 document one does not find new narratives replacing the prior text. The CBEMP & Data Source Comparison chart starting on page 9 of the memorandum states that CBEMP Part 2 subheading 2 “The Setting” will be replaced with the Data Source Chapter 8. However, in the CBEMP Part 2 document in the file, Chapter 2 is not included. Moreover, the Part 2 headings do not track the CBEMP & Data Source Comparison chart and again, neither does the Part 2 document itself demonstrate what Data Source information is replacing the prior text. How is this updated information to be implemented in the regulatory system?

We urge the planning commissioners to request clarifying information and include it in the record in this proceeding. While developed by civic minded community members, the Data Source was not informed by citizens and the public at large. Some of the mapping data may already be outdated. We believe that if there were to be a proposed developmental project to submit applications as we await a comprehensive update to reflect the current data and state of the Coos Bay Estuary (Phase 2), the Phase 1 digitized maps and update will not be sufficient for effectively evaluating the proposed project’s impact on the resources of the bay.

Additionally, we ask that you exercise your discretion and authority to work to remedy the Goal 1 problems by: 1) convening a series of public meetings to thoroughly review the Data Source information; 2) conduct a separate public meeting or more to thoroughly review the changes to the Part 1 management units; 3) direct that the prior versions of the documents (most were amended in May), and all comments received since January 1, 2023 be included in this record; and 4) direct that the minutes, agendas and packets (including prior versions of the documents) considered at the Partnership for Coastal Watersheds meetings be included in this record.

Finally, we also ask you to consider the [attached comments](#) that were submitted earlier this year to state agencies during the previous comment opportunity about the Coos Bay Estuary Management Plan. We urge you to raise these additional issues with staff, in particular, our belief that the proposal, in fact, makes numerous substantive amendments to the management



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units despite representations that the management units are not being amended. We know that several of the points raised are still relevant for this comment period.

Thank you for your time and consideration. We look forward to continuing to work together throughout the collaborative process of the Coos Bay Estuary Management Plan updates.

Sincerely,

Ashley Audycki, ashley@rogueclimate.org
South Coast Regional Coordinator

Referenced Documents

May Memo, Table 3

Section 2.4 Citizen Involvement and Policy #39 Citizen Involvement have been amended to replace the current, defunct County-only citizen advisory committee with this joint advisory committee.

Recommendation(s):

- a) Modify existing language in **Section 2.1 Plan Implementation, Section 2.4 Citizen Involvement, and Policy #39 Citizen Involvement**, to reflect the multi-jurisdictional nature of the CBEMP’s administration. Create a joint CBEMP advisory committee made up of representatives from all three jurisdictions, the port, both local tribes, and the community at-large.
- b) Modify existing language in **Policy #36 Plan Update** to delete references to “Periodic Review” and clarify process for updating of the jointly-adopted CBEMP, including identification of elements of a “comprehensive review and update” to occur when necessary, or at minimum every ten years.

CBEMP Part 2 – Inventories and Factual Base

The Communities, Lands, and Waterways Data Source (Data Source) is proposed to replace portions of the written text in the CBEMP Part 2. The Data Source is a compilation of all available data describing the socioeconomic and environmental conditions in the Coos Bay area. The Data Source provides users with in-depth status and trends information about the Coos Bay Estuary’s attributes, includes evaluations of those attributes, and highlights significant data gaps.

The Data Source is organized into 17 chapters divided into two parts. The Communities section (six chapters) characterizes socioeconomic status and trends in the project area, evaluates the area’s social and economic attributes for comparison with other communities, and provides the Data Source with critical historical perspectives. The Lands & Waterways section (eleven chapters) characterizes and evaluates the status and trends of the project area’s environmental attributes and describes the likely effects of climate change on those attributes.

The Data Source was developed by the Partnership for Coastal Watersheds (PCW), a group of civic-minded local community members representing county and city planners, natural resource managers, and development and conservation interests.

A comparison of content from the CBEMP Part 2 and the Data Source is displayed in Table 3 below. The CBEMP table of contents has four tiers; only the first two tiers are displayed in the table. The table indicates which sections of the CBEMP Part 2 are replaced by sections of the Data Source and which sections are retained.

Unless otherwise noted, the changes referenced in the “Suggested Action” column in Table 3 have been included in the revised CBEMP Part 2.

Recommendation(s):

- a) Revise Part 2 of the CBEMP to incorporate the 2018 Communities, Lands, and Waterways Data Source (Data Source).

Table 3: CBEMP & DATA SOURCE COMPARISON

CBEMP Subheading	Applicable Data Source Section	Suggested Action
Section 1. Introduction		

CBEMP Subheading	Applicable Data Source Section	Suggested Action
1. Introduction	Not Directly Addressed in Data Source	Update and revise.
Section 2. The Setting		
2.1 Physical Aspects	Chapter 8: Physical Description of the Coos Estuary and Lower Coos Watershed	Replace with data source Chapter (Section 8).
2.2 Resources	Whole Document	Replace with data source resources.
2.3 Population	Chapter 4: Community Demographics	Replace with data source Chapter (Section 8).
2.4 Economy	Chapter 6: Jobs and Employment	Replace with data source Chapter (Section 8).
2.5 Land and Water Use	Lands & Waterways (Ch. 8 – 18)	Replace with data source Chapter (Section 8).
Section 3. Coastal Shorelands Boundary Identification and Findings		
3.1 introduction	Not Directly Addressed in Data Source	Retain CBEMP section 3.1. Renumber as Section 2.1.
3.2 Planning Area		Retain CBEMP section 3.2. Renumber as Section 2.2.
3.3 Shoreland Identification Criteria and Boundary Maps		Retain CBEMP section 3.3 (Re-reference data as needed), Renumber as Section 2.3. Add Map Atlas and Reference Historic Maps as applicable (Section 9).
3.4 Geographic Areas Within the Coastal Shorelands Boundary		Retain CBEMP section 3.4 (pg. 3.4-4 through 3.4-7) Renumber as Section 2.4.
3.5 Identification of Agricultural and Forest Lands		Retain CBEMP section 3.5 (coordinate with Vol. I for consistency; pg. 3.5-8). Renumber as Section 2.5.
Section 4. Physical Characteristics and Biological Resources		
4.1 Physical Characteristics	Chapter 8: Physical Description of the Coos Estuary and Lower Coos Watershed	Replace with data source Chapter (Section 8).
4.2 Biological Estuarine Characteristics	LANDS & WATERWAYS	Replace with data source Chapter (Section 8).
4.3 Coastal Shoreland "Values" Requiring Mandatory Protection	Not Directly Addressed in Data Source	Retain CBEMP section 4.3. Minor re-referencing and formatting may be required. Renumber to Section 3.

Referenced Documents

Current CBEMP, Volume 2 Part 2

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[https://www.co.coos.or.us/sites/default/files/
fileattachments/planning/page/21510/
vol_2_part_2.pdf](https://www.co.coos.or.us/sites/default/files/fileattachments/planning/page/21510/vol_2_part_2.pdf)

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1. INTRODUCTION

This document constitutes Part 2 of the Coos Bay Estuary Management Plan. It contains inventories of data and other factual information used to support the plan management decisions that are presented in Part 1 of the Plan. The Coos Bay Estuary Management Plan is set forth in three separate but related documents:

Part 1: Plan Provisions

This document contains the policies and site-specific management decisions that comprise the Estuary Management Plan.

Part 3: Linkage/Statewide Goal Exceptions/Cumulative Effects

Part 2: Inventory and Factual Base

The Coos Bay Estuary Management Plan has been developed to serve as the basis of land and water use and community development regulations for lands lying within the Coos Bay estuary and its shorelands, as designated in this document. The authority, purpose and scope of the Plan are explained in the "Introduction" to the Plan Provisions document (Part 1), which also explains how the Plan was developed, together with related information about citizen participation and the role of state and federal agencies in producing the document.

The remainder of this Inventory and Factual Base document is organized into nine sections:

Section 2 presents an overview of the physical, environmental and socio-economic characteristics of the Coos Bay estuary region.

Section 3 delineates and justifies the "Coastal Shorelands Boundary", based upon the seven criteria of LCDC Goal 17.

Section 4 addresses the nature, location and extent of the physical characteristics and biological resources of the estuary and its shorelands, based primarily upon LCDC Goals 16, 17 and 18.

Section 5 addresses the social characteristics and economic resources of the Coos Bay estuary region and quantitative and qualitative judgments about commercial-industrial development needs, based upon the requirements and considerations of LCDC Goals 9, 16 and 17.

Section 6 presents a special moorage element that sets forth considerations related to long-range commercial-recreational moorage development on Coos Bay.

Section 7 presents special considerations about dredged-material disposal sites that lead to the development of management recommendations which are detailed in Section 6 of Part 1.

Section 8 presents special considerations about potential mitigation/restoration sites that lead to the development of management recommendations which are detailed in Section 7 of Part 1.

Section 9 presents a bibliography of pertinent references, including brief annotations.

Section 10 is an appendix which contains supplemental materials that support Part 2.

As Section 9 indicates, a wealth of information is available about the resources, economic characteristics and potentials of the Coos Bay Estuary and its functionally related shorelands. As should be expected, many contradictions are contained in the numerous studies written about Coos Bay. Although the inventory document presents little new information, since the objective was not to plow new ground, it is perhaps the most comprehensive collection and analysis of existing data performed for the Coos Bay Estuary and shorelands.

This document was prepared to provide a factual basis for establishing a management plan for the Coos Bay Estuary and its shorelands. To that end, the inventory document sorts through the myriad of information available about the Coos Bay Estuary and formulates a factual summary of environmental, social and economic considerations which, in turn, provide a basis for the rational decisions that constitute the Coos Bay Estuary Management Plan.

2. THE SETTING

2. SETTING

2.1 Physical Aspects

The Coos Bay estuary is a drowned river mouth with 30 tributaries surrounded by steep, mostly forested hillsides. The small amount of relatively level land occurs either as diked agricultural land (usually former saltmarsh) or as filled land on which development has already taken place (such as downtown Coos Bay, a former saltmarsh).

At Mean High Water (MHW), the estimated surface area of the estuary is 12,300 acres, second only to the Columbia River estuary, and is comprised of roughly equal proportions of tidelands and submerged areas. The drainage basin encompasses 605 square miles, with tidal influence extending 34 miles up the forks of the Coos River, the main tributary.

North Spit, one of the most prominent features of the bay area, defines the width and length of the lower bay; it formed from sand deposited by "long shore drift", ocean currents running parallel to the shore. Jetty construction near the turn of the century stabilized the mouth; since then the channel at the entrance has been deepened to 47 feet and widened to 700 feet. The main shipping channel has been deepened to 37 feet at 300 to 400 feet in width for 15 miles.

2.2 Resources

As an estuary, Coos Bay provides for a tremendous variety of plant and animal species that thrive in the rich nutrient mix. 66 species of fish and shellfish are found in the estuary, nine of which are anadromous including salmon, steelhead, and striped bass. Several varieties of clams are harvested recreationally and commercially, as is dungeness crab. Oysters are commercially raised and harvested in Joe Ney Slough and South Slough.

Much of the agricultural land in the area was created by the diking and tidegating of narrow tributaries, primarily around saltmarshes; correspondingly, the resulting agricultural soils are often Class IVw, with substantial wetness problems. Undeveloped portions of the uplands are generally coniferous forest, notably Douglas fir and Sitka Spruce.

2.3 Population

In 1980 the population of Coos County was 64,047; an earlier estimate by Portland State University for 1978 was 63,200. By the year 2020, the estimated population for Coos county is anticipated to be 69,513 (Office of Economic Analysis, Oregon Department of Administrative Services). Between 1995 and 2020 the projected population is expected to increase by an average of 1.77%, due to the influx of people within the retirement age group.

Between 1980 and 1994 the population of Coos County decreased by 1.95%. During this 14 year period, areas of the county which were economically dependent on timber alone, showed a decrease in population.

The Cities of Coos Bay and North Bend which are the largest in Coos County did not show a decline in population during this 14 year period; nor did they exhibit an outstanding increase in population.

2.4 Economy

Coos County has experienced some significant changes in its economy since 1980. Some of the changes include: decline in household size; increase in proportion of older persons; decline in the manufacturing sector and the resulting loss of high-paying manufacturing jobs; and growth in trade, services, and government sectors.

These shifts indicate the general trend of the region's economy away from a resource- and manufacturing-based economy to one with growing retail and service sectors.

The Bay Area economy comprises a number of key industries, including an active visitor industry, a major fishing and seafood-processing center in Charleston harbor, the wood products industry, and the Bay's shipping industry enhanced by its deep-draft navigation channel. Shifts in employment are expected to continue, but the shift is expected to slow with the industry mix stabilizing somewhat. A growing economy requires new construction and development, with growth expected in the construction sector.

Development patterns appear positive due to changes in land and real estate markets, fiscal and policy environments, and national and international economic conditions. Two examples include the potential entry of a steel mill and the potential development of a natural gas pipeline in the Bay Area. The steel mill is currently considering three possible locations, including Coos County. With a direct impact of 250 manufacturing jobs at full buildout, development of a steel mill would serve to slow the loss of manufacturing-sector employment in the county. In the long term, a steel mill would have direct, indirect, and induced impacts estimated as an increase in 563 jobs and 283 persons to the county, and 313 jobs and 565 persons statewide.

2.5 Land and Water Use

Most land uses are confined to the urban areas of North Bend and Coos Bay, although some industrial development has occurred across the bay on North Spit as has rural residential development along East Bay Drive. The shorelands areas of the three incorporated cities are generally devoted to water-dependent and water-related industrial uses, although residential use occurs along occasional steep bluffs that present easy access to the bay.

The estuary provides for a multitude of uses, including shipping activity, log transportation and storage, marinas, fishing, and recreational clamming and crabbing. Public access is provided to the estuary at a number of locations.

Referenced Documents

Proposed Amendment, Volume2 Part 2
Table of Contents - (missing) Chapter 2

https://www.co.coos.or.us/sites/default/files/fileattachments/community_development/page/23908/coos_county_cbemp_ord_draft_exhibit_d_reduced_coos_county.pdf

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1. INTRODUCTION

~~In 2019, Part 2 of the Coos Bay Estuary Management Plan was partially modified and updated to be consistent with the best information available at the time. The following sections 1 through 7 consists of original pieces of the Part 2 that have been conserved for the purposes of consistency and goal compliance. Supplemental factual information is provided in Section 8: Communities, Lands & Waterways Data Source and in Section 9: Coos Estuary and Shoreland Atlas.~~

This document constitutes Part 2 of the Coos Bay Estuary Management Plan. It contains inventories of data and other factual information used to support the plan management decisions that are presented in Part 1 of the Plan. The Coos Bay Estuary Management Plan is set forth in three separate but related documents:

Part 1: Plan Provisions

This document contains the policies and site-specific management decisions that comprise the Estuary Management Plan.

Part 3: Linkage/Statewide Goal Exceptions/Cumulative Effects

Part 2: Inventory and Factual Base

The Coos Bay Estuary Management Plan has been developed to serve as the basis of land and water use and community development regulations for lands lying within the Coos Bay estuary and its shorelands, as designated in this document. The authority, purpose and scope of the Plan are explained in the "Introduction" to the Plan Provisions document (Part 1), which also explains how the Plan was developed, together with related information about citizen participation and the role of state and federal agencies in producing the document.

The remainder of this Inventory and Factual Base document is organized into nine sections:

~~Section 2 presents an overview of the physical, environmental and socio-economic characteristics of the Coos Bay estuary region.~~

Section 23 delineates and justifies the "Coastal Shorelands Boundary", based upon the seven criteria of LCDC Goal 17.

~~Section 4 addresses the nature, location and extent of the physical characteristics and biological resources of the estuary and its shorelands, based primarily upon LCDC Goals 16, 17 and 18.~~

~~Section 3 addresses the Coastal Shoreland "Values" Requiring Mandatory Protection under State Planning Goal #17. Section 5 addresses the social characteristics and economic resources of the Coos Bay estuary region and quantitative and qualitative judgments about commercial industrial development needs, based upon the requirements and considerations of LCDC Goals 9, 16 and 17.~~

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~~Section 46 presents a special moorage element that sets forth considerations related to long-range commercial recreational moorage development on Coos Bay.~~

~~Section 54E presents beaches and dunes element based upon the requirements and considerations of LCDC Goal 18.~~

~~Section 5 presents a special moorage element that sets forth considerations related to long-range commercial recreational moorage development on Coos Bay.~~

~~Section 67 presents special considerations about dredged material disposal sites that lead to the development of management recommendations which are detailed in Section 6 of Part 1.~~

~~Section 78 presents special considerations about potential mitigation/restoration sites that lead to the development of management recommendations which are detailed in Section 7 of Part 1.~~

~~Section 9 presents a bibliography of pertinent references, including brief annotations.~~

~~Section 8 is the Communities, Lands & Waterways Data Source that presents an overview of the physical, environmental and socio-economic characteristics of the Coos Bay estuary region. It also addresses the nature, location and extent of the physical characteristics and biological resources of the estuary and its shorelands, based primarily upon LCDC Goals 16, 17 and 18. Furthermore, it addresses the social characteristics and economic resources of the Coos Bay estuary region and quantitative and qualitative judgments about commercial industrial development needs, based upon the requirements and considerations of LCDC Goals 9, 16 and 17.~~

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~~Section 9 is an appendix which contains the Coos Estuary and Shoreland Atlas as supplemental materials that support Part 2.~~

~~Section 10 is an appendix which contains supplemental materials that support Part 2.~~

~~As Section 9 indicates, a wealth of information is available about the resources, economic characteristics and potentials of the Coos Bay Estuary and its functionally related shorelands. As should be expected, many contradictions are contained in the numerous studies written about Coos Bay.~~

~~Although the inventory document presents little new information, since the objective was not to plow new ground, it is perhaps the most comprehensive collection and analysis of existing data performed for the Coos Bay Estuary and shorelands.~~

This document was prepared to provide a factual basis for establishing a management plan for the Coos Bay Estuary and its shorelands. To that end, the inventory document sorts through the myriad of information available about the Coos Bay Estuary and formulates a factual summary of environmental,

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social and economic considerations, which, in turn, provide a basis for the rational decisions that constitute the Coos Bay Estuary Management Plan.

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23. COASTAL SHORELAND BOUNDARY IDENTIFICATION AND FINDINGS

23.1 INTRODUCTION

Statewide Planning Goal #17 (Coastal Shorelands) defines "coastal shorelands" as "those areas immediately adjacent to the ocean, all estuaries and associated wetlands, and all coastal lakes." Goal #17 requires identification of shoreland areas in accordance with seven criteria. These criteria are applicable within the "Planning Area," which is an area for inventory and study, to determine the location of the "Coastal Shorelands Boundary".

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23.2 "PLANNING AREA"

According to Goal #17, the "Planning Area" for the Coos Bay Estuary system encompasses the following area:

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"~~All~~ lands west of the Oregon Coast Highway" except "the lands west of a line formed by connecting the western boundaries of the following described roadways: Oregon State 240, Cape Arago Secondary (FAS263) southerly from its junction with the Oregon Coast Highway to Charleston."

Also included to the east of Highway 101 and Cape Arago Highway are:

"~~All~~ lands within an area defined by a line measured horizontally; 1,000 feet from the shoreline of estuaries" (Statewide Planning Goal #17). According to these criteria, the "Planning Area" extends a maximum of 1,000 ~~ft.~~ feet from the estuary shoreline in the entire upper bay (above McCullough Bridge), in the upper slough and riverine systems, and in South Slough above Charleston Bridge.

23.3 SHORELAND IDENTIFICATION CRITERIA AND BOUNDARY MAPS (Findings)

The seven criteria of Goal #17 and the way in which they were interpreted and applied are detailed below. The criteria are mapped in detail within the planning area on a set of maps at a scale of 1" = 800'. Property lines are shown on all maps. The head of tide for sloughs and rivers was determined by use of: (i) "Heads of Tide for Coastal Streams," ~~Division-Department~~ of State Lands, and (ii) Coos County Planning Staff field surveys of tidegates on July 16 and 21, 1981 for those areas not surveyed by DSL. Working tidegates are deemed to be the effective head of tide, and therefore the furthest extent of the estuarine area, wherever they occur. It is recognized that many working tidegates are not completely water-tight, and limited saline intrusion often occurs upstream. However, upstream areas above tidegates are not considered estuarine, because of the lack of direct tidal influence.

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Criterion #1. "Lands which limit, control, or are directly affected by the hydraulic action of the coastal water body, including floodways." These include:

- (a) Land subject to flooding by the estuarine portion of coastal rivers and sloughs. [Source: HUD Flood Hazard Boundary Maps]. Rivers are the Coos and the Millicoma. Sloughs are the following: North, Palouse, Larson, Kentuck, Willanch, Catching, Ross, Isthmus, Coalbank, Joe Ney and South.

Criterion #2. "Adjacent Areas of Geologic ~~Instability~~" ~~These~~ ~~Instability.~~ These include:

- (a) Areas of slump topography ~~the Coos Bay Coastal Shoreland Boundary.~~ [There are none within the Coos Bay Coastal Shoreland Boundary.] (Source: Environmental Geology of Western Coos and Douglas Counties, DGMI, 1975.)
- (b) Areas of unstable open dune sand. (Source: "Beaches and Dunes of the Oregon Coast" OCCDC and SCS, 1974.)

Criterion #3. "Natural or man-made riparian resources, especially vegetation necessary to stabilize the shoreline and to maintain water quality and temperature necessary for the maintenance of fish habitat and spawning areas."

- (a) Vegetation was mapped schematically using aerial photos, along estuarine shorelines and coastal rivers and sloughs, as a riparian strip which stabilizes banks and maintains water temperature. Without the necessary field surveys, it is not possible to exactly determine the boundary between riparian vegetation and non-riparian vegetation. On-site field checks would be necessary to determine precisely the exact location of riparian vegetation for site specific development proposals.

Criterion #4. "Areas of significant shoreland and wetland biological habitats." These include:

- (a) "Significant wetland habitats" are identified by Oregon Department of Fish and Wildlife, using the USFWS National Wetlands Inventory as a basic source. Not all wetland areas inventoried by USFWS are considered "significant." Many are small, isolated areas or wet meadows under agricultural use, which ODFW determined were not significant wildlife habitats. [See Section 4.3, "Coastal Shoreland Values Requiring Mandatory Protection" for further discussion.]
- (b) Other non-wetland (upland) habitat areas within the planning area include such significant habitats as heron rookeries, snowy plover nesting sites. [See Section 4.3.]

Criterion #5. "Areas necessary for water-dependent and water-related uses, including areas of recreational importance which utilize coastal water or riparian resources, areas appropriate for navigation and port facilities, and areas having characteristics suitable for aquaculture.

These areas include sites that are potential candidates for water-dependent and water-related uses. Because it is not possible to determine the needed land area at this stage, they are not necessarily those sites that will finally be designated for these uses in the plan. [Source: Coos County Planning Dept.] Coastal recreation sites include boat ramps, waysides and parks. [Source: Coos County Comprehensive Plan Background Document, 1979.]

Criterion #6. "Areas of exceptional aesthetic or scenic quality, where the quality is primarily derived from or related to the association with coastal water areas, ~~emphasis added.~~"

- a) There are no areas of exceptional aesthetic or scenic quality within the Planning Area. [See Section 4.3.]

Criterion #7. "Coastal headlands."

a) Headlands were identified on the basis of typical landform: a promontory with steep sides. There is only one coastal headland (Coos Head) within the Coos Bay Estuary planning area.

The Coastal Shorelands Planning Area was initially established to provide a framework within which to map the shorelands boundary. The shoreland boundary itself follows the outline of the feature which extends furthest upland, but is still within the planning area boundary. The boundary is delineated schematically on the 1"=800' scale maps so as to show its relationship to the shoreline and to make on-site determinations of the precise location of the boundary in many cases, particularly regarding riparian vegetation or flood hazard.

23.4 GEOGRAPHIC AREAS WITHIN THE COASTAL SHORELANDS BOUNDARY

The following narrative gives a brief description of the geographic areas within the Coos Bay Estuary Coastal Shorelands Boundary, going from north to south.

Area 1 - Haynes Inlet

This area includes North Slough, Palouse Slough and Larson Slough. There is scattered residential use around Haynes Inlet but mainly along the south side. The Conde B. McCullough Bridgehead Wayside and Boat ramp is along this southerly shoreline. There are a few significant wetlands within the area. For the most part, the shoreline coincides with the 100-year floodplain. Head of tide on North Slough is at the tidegate where Hwy. 101 crosses it; on Palouse and Larson Slough it is at the tidegates where North Bay Drive crosses them. The division is bounded on the west by the Oregon Dunes National Recreation Area and the Siuslaw National Forest.

Area 2 - East Bay

This division extends from Glasgow to Graveyard Point and includes Kentuck and Willanch Sloughs. There is scattered to light density residential use from Glasgow to Graveyard Pt. There are significant wetlands around the sloughs with some of these under agricultural use. The shoreland boundary follows the 100-year floodplain to the head of tide at Kentuck and Willanch Sloughs. Head of tide is at the tidegate where East Bay Drive crosses the sloughs. There is a fairly continuous strip of riparian vegetation throughout.

Area 3 - Coos River

This area extends from Graveyard Pt. east up Coos River to the fork of the Coos and Millicoma Rivers. The north side of the river is mainly characterized by forested shoreline with a narrow strip under agricultural use. The shoreland boundary follows the 100-year floodplain, which mostly coincides with the Hwy. 241 dike.

On the south side, the shorelands boundary follows the 100-year floodplain or the 1,000 foot planning area boundary, whichever is the lesser, through the agricultural lands. It follows the riparian vegetation line where forested uplands extend to the river's edge.

The Dora's Place Boat Ramp is located close to the fork of the rivers.

Area 4 - Millicoma River

This area extends up-river along the Millicoma River to the head of tide near Allegany. The floodplain is occupied by agricultural lands. There is an almost continuous strip of riparian vegetation along the river.

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The shorelands boundary follows the 100-year floodplain up to the 1,000 foot planning area boundary for the most part. It also includes a potential site for water-dependent use located at Allegany, a log-transfer site.

At the lower end of the area is the Millicoma Boat Ramp and about mid-way is Rooke-Higgins Park (County).

Area 5 - South Fork Coos River

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This area extends along the South Fork Coos River to head of tide near Dellwood. It also includes a small reach of Daniels Creek to head of tide. It is similar to Division 4 in that the dominant use in the floodplain is agriculture. There are areas of dense riparian vegetation throughout the river's shoreline.

The shorelands boundary runs along the 100-year floodplain up to the 1,000 foot planning area boundary and includes a potential site for water-dependent use at the Dellwood log transfer site.

Along Daniels Creek the shorelands boundary follows the 100-year floodplain.

Area 7 - Eastside/Coalbank Slough

This area includes the city of Eastside and Coalbank Slough. There is a large section of potential sites for water-dependent or water-related use along the western edge of Eastside.

The north-western shorelands boundary follows the shoreline of the slough while the south-eastern edge follows the 100-year floodplain and includes some significant wetland wildlife habitat.

The urban area within the City of Coos Bay on the north shoreline of the slough is committed to non-water dependent/related uses, and is not, for the most part, considered an area of potential sites for water dependent/related uses.

Area 8 - Isthmus Slough

This division takes in Isthmus Slough from Eastside to head of tide near Greenacres, Shinglehouse Slough and Davis Slough to their heads of tide. Isthmus Slough has certain areas of significant wetland wildlife habitat in the vicinity within the Planning Area.

The shorelands boundary follows the 100-year floodplain and wetlands. In places, the boundary coincides with the railroad, Highway 101 or Olive Barber Road, where they mark the edge of the floodplain.

A significant freshwater wetland lies to the north of Davis Slough. Shinglehouse Slough is closely confined by uplands and a narrow riparian strip. On these sloughs, the shoreland boundary follows the 100-year floodplain to the heads of tide and includes the wetlands.

The Shinglehouse Slough Boat Ramp is located where Highway 101 crosses the slough.

Area 9 - Coos Bay - North Bend

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This area includes the waterfront of Coos Bay and North Bend, including Pony Slough from Coalbank Slough to Empire. The waterfront of Coos Bay and North Bend has been cited as having many potential sites for ~~water dependent~~ water dependent/related uses. The main activity in this area is industrial and commercial use with water-dependent uses predominating. There are also major ship docking facilities.

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The shoreland boundary includes a number of potential water dependent/related sites near the shoreline from downtown Coos Bay to McCullough Bridge at Empire waterfront. Simpson Wayside is located just west of the McCullough Bridge.

Adjacent to Pony Slough is the North Bend Airport. The shoreland area between the airport and Empire is mostly undeveloped, and the boundary is defined by riparian vegetation and the steep shoreline.

Offshore from the city of Coos Bay, west of the airport and south of Empire, are dredge spoil disposal islands.

Area 10 - North Spit

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This division extends from the railroad crossing at Jordan Cove to the north jetty. It is bounded on the north by the Siuslaw National Forest and on the west by the Ocean Shorelands Boundary. The Menasha industrial complex including a docking facility, is in the Jordan Cove area, as is Ore-Aqua, an aquaculture facility. An industrial waste holding pond lies immediately east of the beach at the point where the North Spit proper begins. Port of Coos Bay land to the south of the waste pond is a potential site for water-dependent use. There is also a potential site at the southern tip of the spit.

There are numerous areas of significant wetland wildlife habitat throughout this area, most prominent being Henderson Marsh and the area south of the holding pond. There are also large segments of active dune sand. The shoreland boundary follows the 100-year floodplain, wetlands and/or areas of geologic instability to the Ocean-Shoreland boundary on the west.

Area 11 - Empire/Charleston

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This area runs from Empire to, and inclusive of, Charleston. Residential usage is frequent along the shoreline of this area with scattered industrial and commercial use. However, riparian vegetation remains unbroken along large portions of the shoreline from Empire to the Charleston Bridge.

There are a number of potential sites for water dependent use along the Empire waterfront, at Sitka Dock and in and around Charleston.

Charleston is dominated by the boat basin and related enterprises, e.g., boat repair and seafood processing.

The shoreland boundary generally follows the 100-year floodplain or riparian vegetation from Empire south to the Charleston Bridge. The recreational sites are Empire Boat Ramp, Barview Wayside and Charleston Boat Basin.

Area 12 - South Slough

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This area encompasses South Slough and Joe Ney Slough. A major portion of South Slough comprises the South Slough Estuarine Sanctuary. There are scattered areas of significant wetlands, particularly at the head of the sloughs.

The shoreland boundary follows the ~~100-year~~100-year floodplain or riparian vegetation to the head of tide on South Slough, Elliott Creek, Talbot Creek and John B. Creek.

Joe Ney Slough has a unit of significant wetlands in a diked area at its head. At the mouth of the slough and on a part of the northern shoreline are potential sites for water dependent use.

The shoreland boundary generally follows the ~~100-year~~100-year floodplain or riparian vegetation the head of tide.

23.5 IDENTIFICATION OF AGRICULTURAL AND FOREST LANDS

Certain areas within the Coastal Shorelands Boundary contain soil classes which, by goal definition, require their protection as agricultural and forest lands. The process used to identify these lands, and the detailed maps describing these areas, are contained within Volume 1 of the Coos County Comprehensive Plan.

4.3 COASTAL SHORELAND "VALUES" REQUIRING MANDATORY PROTECTION

4.3.1 STATEWIDE GOAL REQUIREMENTS

State Planning Goal #17 (Coastal Shorelands), under the Section "Coastal Shoreland Uses", states:

"Major marshes, significant wildlife habitat, coastal headlands, and exceptional aesthetic resources inventoried in the Identification section shall be protected." (Emphasis added) (LCDC Goal #17).

It further states that:

"Uses in these areas shall be consistent with protection of natural values. Such uses may include propagation and selective harvesting of forest products consistent with the Oregon Forest Practices Act, grazing, harvesting wild crops, and low-intensity water-dependent recreation."

These features are identified on the inventory map "Shoreland values Requiring Mandatory Protection" and protection measures are specifically addressed in Section 3.3 of the Management Plan, "Policies".

4.3.2 "MAJOR" MARSHES

The wildlife values of these natural features are also addressed in Section 4.3.3 because all 'major marshes' are:

- (i) Size
- (ii) Flood protection value
- (iii) Recharge area for important aquifer
- (iv) Recreational importance (e.g., for duck hunting)

There are four freshwater marsh areas which are both large in area and fit one or more of the other criteria. They are as follows:

- (i) Henderson Marsh
- (ii) Deflation plain marshes north of waste treatment lagoon on North Spit
- (iii) Deflation plain marshes south of waste treatment lagoon on North Spit
- (iv) Marsh on Pony Slough in North Bend, north of Newmark

Henderson Marsh is a large freshwater marsh and swamp which totals about 160 acres. It is an old "wet deflation plain" which collects large volumes of rainfall during the wet season. Like other low-lying wetlands on the North Spit and further north in the Coos Bay dune sheet, it recharges an important aquifer which lies beneath the dunes. Naturally, due to the permeability of the dunes, a certain amount of recharge occurs throughout. However, these low-lying areas are of special importance because they

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February 24, 2023 Comments



Rogue Climate South Cast office:
243 S. 2nd Street Coos Bay, Oregon 97420
541-816-0758

Friday, February 24, 2023

Jill Rolfe, Community Development and Planning Director, jrolfe@co.coos.or.us

Greetings,

Rogue Climate understands that the County is accepting comments on its Phase 1 Amendment (Amendment) to the Coos Bay Estuary Management Plan. Rogue Climate asks that the County consider the requests, arguments, and comments herein and those raised in our correspondence of February 16, 2023, addressed to the state agencies, which are attached. Please accept these comments, including those in the attachment, into the records of these proceedings.

For the reasons stated in our February 16 correspondence, there are too many unanswered questions about the nature, effect, and scope of the proposed Amendment to move it forward to formal proceedings or to file a post-acknowledgment plan amendment (PAPA) with DLCD in March as proposed.

Instead, we ask that the County convene two well-noticed public hearings/events, one at the end of March and another 30 days out in April, with staff participation to enable the public to obtain answers to the many questions before the PAPA is filed. This will postpone the planning commission stage of the proceedings for only 60 days. This would also provide additional time for the County to conduct a more robust and thorough consultation with Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians and the Coquille Indian Tribe, if requested, which we urge you to do.

Sincerely,

Ashley Audycki
South Coast Regional Coordinator
Rogue Climate
ashley@rogueclimate.org

CC'd:

Diane Schwab, Chair of the Coos County Planning Commission c/o Jill Rolfe,
Development and Planning Director, jrolfe@co.coos.or.us
Amy Aguirre, Chair of the City of Coos Bay Planning Commission c/o Chelsea
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Ed Hughes, Oregon Department of Fish and Wildlife, Edward.S.HUGHES@odfw.oregon.gov
Stacey Scott, Oregon Parks and Recreation Department, Stacy.SCOTT@opr.org

Greetings,

Rogue Climate understands that your agencies have been invited to comment on what is called the Phase 1 Amendment to the Coos Bay Estuary Management Plan. Rogue Climate would like you to consider the following points and questions about the proposal as you complete your review. Rogue Climate also asks you to seek sufficient time to thoroughly review this proposal.

Firstly, our organizations have sought unsuccessfully for several months to learn how the updated resource inventories (the maps, especially those of the map atlas 3.1 - 6.3) will be incorporated into the plan when: 1) the maps are not referenced anywhere in the text (except the M3 (general zoning) and the M6 (wet meadows) maps); 2) Policy 3, referencing the Special Considerations Map which assimilated the more detailed inventory maps, is to be stricken¹; and 3) the “resource matrixes” (Goal 16 and Goal 17/18) are not being amended to include new

¹ Policy 3 currently states, in relevant part: The "Coos Bay Estuary Special Considerations Map", which is a series of color mylar overlays, shall delineate the general boundaries (plan inventory maps contain more precise boundary locations) of the following specific areas covered by the Coos Bay Estuary Management Plan:

- a. Coos Bay Estuary Coastal Shorelands Boundary;
- b. Sensitive Beach and Dune Areas:
 1. areas unsuitable for development,
 2. areas with limited development suitability;
- c. Floodplain Hazard Areas;
- d. Agricultural Lands Designated for Exclusive Farm Use and "Wet Meadow" Wetlands;
- e. Coastal Historical and Archaeological Sites;
- f. Urban Growth Boundaries (UGB's);
- g. Priority Dredged Material Disposal and Mitigation/Restoration Sites;
- h. Significant Wildlife Habitat and Major Marshes;
- i. Forest Lands.



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resources identified in the management units and are not being amended to use the same nomenclature of the new inventory maps. Our unsuccessful efforts include directing questions to Michael Howard and Amanda Ferguson again recently when we were directed to do so by county staff a few weeks ago. Perhaps you can help us and we would welcome your assistance.

As understood, however, the new inventory maps **may** be consulted only if the proposed development is subject to a Policy # 4a analysis and only to determine if the resource listed in a resources matrix “actually exists.” So, if the new inventory maps identify a new (or previously unidentified) marsh, seagrass, or oyster bed and the Goal 16 matrix does not list it in the relevant management zone, or if the use or activity is not subject to policy 4a, the resource will not be considered in the permitting process. As an example, on the National Wetlands Inventory map, Map 5.6, a rather large marine wetland is shown in Management Unit 1 CA (exactly where the CA1 is designated on Map M1.1) which is not identified on the “Local Wetlands Inventory” map, Map 5.7; yet, the Goal 16 resources matrix does not list that unit as having a major salt marsh or a major tideflat. The Matrix does indicate there is an “other tideflat” but not “other salt-marsh” so it is unclear whether that Marine wetland would be considered (or has been considered) in any Goal 16 analysis including under the deferred analysis of Policy 4 and 4a. While Rogue Climate appreciates the work done to update the inventories, we are concerned that the simple existence of and purported adoption of the maps in this amendment process is or will be misleading; will they have any real effect?

To avoid this and be able to rely on the new inventory maps, we ask that you propose to rewrite Policy 3 to require (notwithstanding any other provision of the plan): 1) a Policy 4 resource capabilities test and impact assessment test for any and all development proposals which contain or may impact the natural resources identified in the new inventory maps; and 2) a Policy 4a needs assessment which would require denial unless findings could be made to demonstrate the public’s need and gain would warrant a modification or loss of the resource or “estuarine ecosystem.” This appears to be needed to have the possibility of consideration of the updated information and all of it will be revisited when the county gets to a “phase 2 amendment.” This may take some time and effort to draft and we urge you to take the time to consider it and craft it, asking the County to postpone filing the PAPA on March 1, as planned, if necessary.

Secondly, we ask that you consider and urge a process to be adopted as a new policy 3 (similar and in addition to what is requested above) which will require any applicant for a use or activity that will be located in the hazard areas identified in Map 5.3 (Flood Zones), Map 5.4 (Landslide Susceptibility), Map 5.8 (Sea Level Rise), and Map 5.9 (Tsunami Inundation) (among others potentially) to be required to submit a hazard/geologic assessment prior to permit approval (administrative or otherwise) to be written by a qualified licensed professional (from a pre-approved list) that conforms, at minimum (and as may be made applicable to those specific hazards), to the requirements the County adopted for the Balance of County in Article 5.11 of its



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Land Development Code in 2019. There is no way to address any of the hazards identified in those maps and protect the community, otherwise, we believe. There is still no proposal to apply hazards overlays in the Estuary despite the County's notice to its Planning Commission and the public in 2019 that it would be presented in 2020. As understood, findings supporting the adoption of such are presented in the Coos Bay Climate Hazards Adaptation Plan finalized in September 2022, and prepared by the Institute for Policy Research and Engagement, which could be adopted now, as well.

Thirdly, we ask you to thoroughly consider and comment on the County's position that, aside from amending four definitions and the citizens involvement provision, 2.4, it is not making any substantive amendments. We do not find this to be accurate. There are numerous substantive amendments, despite their seemingly subtle nature. We have only begun to make a list of them but anticipate that you should also find this to be the case. General examples include: 1) restating an allowed use or activity to track the relevant goal or rule language to now including a use or activity not before listed, like "related dredging" for mining operation (see Vol 2 Pt 1 § 5 p. 38 3-DA Management Unit); 2) allowing uses conditionally which were not allowed before; and 3) moving an **activity** - like Navigation activities related to water-dependent commercial enterprises and activities - from a conditional activity (subject to policies 5 and 8 requiring impact minimization) to an allowed conditional **use**. See Vol. 2 Pt 1, § 5 p.6 CSDNC-DA management unit (electronic page 124). These are all substantive amendments to the management units. The CBEMP acknowledges that it may restrict estuarine development to be less intensive than uses allowed by Goal 16. Amendments which now only restrict development to that which is equal to that allowed by Goal 16 are substantive amendments and there should be no confusion about that.

Fourthly, we ask that you urge the County to remedy what we believe is a Goal 1 violation. This 5-year planning process has not had a public participation component, until an open house conducted on January 7, 2023, that only had 19 days of public notice, over the winter holidays. As we define it, public participation includes notice and opportunity to comment. The County has a current, adopted public participation plan which includes convening a citizens advisory committee (CAC) which shall be involved in all phases of the planning process and which shall represent the broad geographical area and varied interests. CBEMP Vol 2 pt 1 § 1.5. The CAC involvement, aiding the planning process by raising concerns and/or supporting revisions, is to occur prior to public hearings and determinations by the planning commissions. CBEMP Vol 2 pt 1 § 2.4. This has not occurred. This could be remedied by conducting 2 or 3 well noticed (with sufficient lead-time) meetings to engage the public generally, to enable an understanding, to raise concerns and to voice support for the proposals. We urge you to ask for this public engagement before the PAPA is filed.

Fifthly, we ask that you increase the participation of impacted community members on the Citizen Advisory Committee. Especially as we celebrate the 50th anniversary of SB 100, we



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need to bolster—not retreat from Oregon’s democratized land use system by fostering—not limiting public participation. The proposal would limit members of the public to two people. It inappropriately gives additional voice to the Port of Coos Bay which already has a coordinated role similar to state agencies, and it inappropriately fails to include Indigenous perspectives. We ask that you consider and urge an amendment to sections 1.6, 2.1 and 2.6 of the Plan to include the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians and the Coquille Indian Tribe to be included in the list of entities - the Port, state and federal agencies - to be consulted to respond to plan amendments and updates. Further, we also believe an amendment to section 1.6 directing the County to enter into a coordination and cooperation agreement with the Tribes should be adopted.

As for the public involvement component, we ask you to consider an amendment that would increase the number of members to at least 9. The cities of Coos Bay and North Bend should also be able to designate one member each that are residents who are not officials or employees of the local governments. The Citizen Advisory Committee composition should have a majority of appointed positions be filled by residents working in the fishing industry, the oyster or clam industry, recreation, and residents representing environmental justice issues and interests, including tribal citizens, and conservation groups - communities that are most impacted by the health of the Coos Bay.

Finally, we ask that you consider and urge the County to consider and take steps to put in place a moratorium on development in the CBEMP management units, if this Phase 1 amendment does not require decision making to be based upon the updated inventories presented in the maps to be adopted and/or if the Phase 2 amendment will not be completed by 2026.

Sincerely,

Ashley Audycki, South Coast Regional Coordinator
Rogue Climate

Hannah Sohl, Executive Director
Rogue Climate

CC’d:

Jenni Schmitt, Partnership for Coastal Waterways Coordinator, Jenni.Schmitt@dsl.oregon.gov

Jill Rolfe, Community Development and Planning Director, jrolfe@co.coos.or.us

Chelsea Schnabel, City of Coos Bay Planning Administrator, cschnabel@coosbay.org

Derek Payne, City of North Bend Planner, dpayne@northbendcity.org

January 30, 2024 Comments



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Monday, January 30, 2023

Michael Howard and Amanda Ferguson
University of Oregon Institute for Policy Research and Engagement
% Coos County Community Development Department

Greetings,

At the last few public meetings, I was asked to direct my questions to you. Below are some of Rogue Climate's continuing questions and a few comments, and I hope you might be able to get back to me soon.

While Rogue Climate appreciates the recent efforts to bring the public into this process with a publicly noticed open house, that event on Saturday, January 7, 2023, did not provide sufficient opportunity to learn about what is being proposed.

The subsequent Partnership for Coastal Watersheds (PCW) meeting on Tuesday, January 10, 2023, also did not provide the opportunity for engagement that we hoped for. At that meeting, some questions went unanswered.

We have requested information that we believe is critical to understanding the process and the impacts of the proposed revisions, like the questions we asked during phone conversations with you last month. We now have a few more questions on a cursory review of the documents placed in the AM 22-05 file at the beginning of January. We also ask you to provide relevant documents directly, treating this as a public records request, if necessary

1. We understand that the maps have not been incorporated into the matrixes, and the matrices have not been updated/amended. Please confirm. Why are they in the amendment file if they have not been amended? How will the updated information in the maps affect them if they are not updated?

2. Is there a reason the Coos Estuary and Shoreland Map Atlas (included in the AM19-03 file) are not included in the AM22-05 file?

3. What is the specific reason the more recent work by the Institute for Policy Research and Engagement developing the Coos Bay Coastal Hazard Vulnerability



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Assessment and Adaptation Plan, the Coos Bay Climate Hazards Adaption Plan, and relevant hazards mapping is not being included in this phase 1 amendment? As you know, they recommend adopting a sea level rise/flooding overlay in the zoning codes and urges the adoption of a regulation that prohibits maladaptive development in flood areas. If it will be taken up in Phase 2, have you been told when that will start?

4. Please provide citations to the state or federal laws that are the source of the proposed amendments to four definitions.

5. As we understand, the County's Citizen Advisory Committee has not been invited to participate in this process. Do you know why not? Does the County intend to include the Citizen Advisory Committee in this process before presenting the amendments to the County Planning Commissions?

Requested documents:

1. A copy of the M7 map - "M7. Tentative Goal #16/Goal #17 Development Priority Areas" - and the Appendix C referenced in the AM 22-05 file?
2. Copies of the currently effective matrixes.
3. Copies of documents containing the data and its sources for the maps.
4. Copies of all requests for proposals, contracts, memorandum of agreements, or similar documents related to the work performed by the University of Oregon Institute for Policy Research and Engagement, the work performed by the Partnership for Coastal Watersheds since 2015.

Regards,

Ashley Audycki
South Coast Regional Coordinator
Rogue Climate
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cc: Lisa Phipps, Department of Land Conservation and Development
Hui Rodomsky, Department of Land Conservation and Development