

Cassidy Carr

From: Planning Department
Subject: FW: Comments for HBCU-24-001 Ocean River LLC CU application

To: Jill Rolfe, Planning Director

Please include these comments into the hearing record for the **Ocean River LLC Conditional Use application HBCU-24-001**
Also please let me know you have received this today, thank you.

I am concerned that the proposed application is incompatible with the adjacent Bandon State Natural Area (BSNA) and the Snowy Plover Management Area, (SPMA) and will have devastating effects on the ongoing federal efforts for plover recovery.

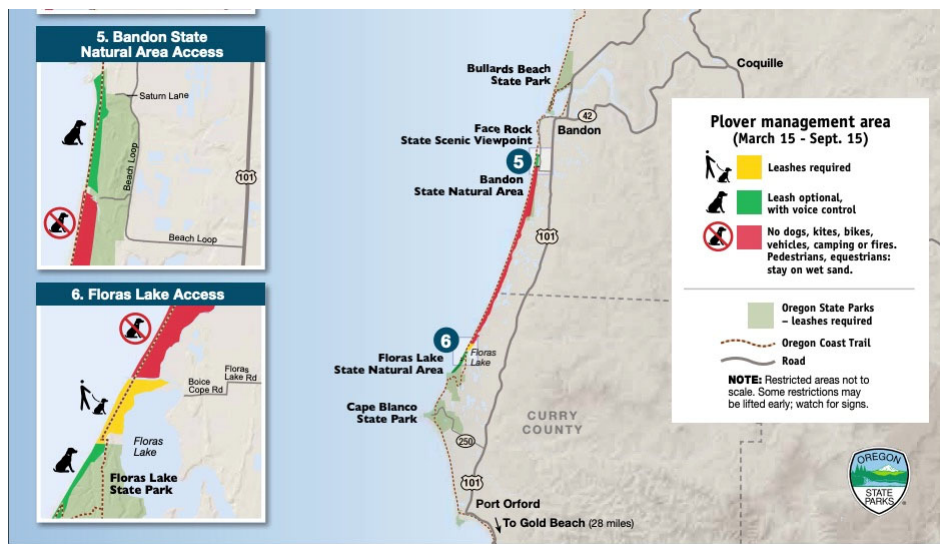
Bandon Snowy Plover Management Area, (SPMA), "is an extremely important nesting area..."
See: p. 21 The Distribution and Reproductive Success of the Western Snowy Plover along the Oregon Coast - 2020 <https://inr.oregonstate.edu/sites/inr.oregonstate.edu/files/2021-06/snpl-2020-report.pdf>

The proposed application site is currently low-intensive Exclusive Farm Use (EFU), and remains a relatively natural barrier adjacent to the BSNA existing all along the entire western border of the proposed development site. The proposed intensive development and continued intensive use being proposed is incompatible compared to the permitted use that exists on the property now.

This intensive use and development proposal will alter and clear the landscape and open up the remote BSNA and the SPMA to increased disturbance, recreational access, and predation pressure, making federally protected plover nesting areas more vulnerable to nest abandonment and destruction. Currently this is a rather remote area important for nesting and recovery efforts.

Below shows the Lower portion of the South Coast brochure from Oregon State Parks — which is located entirely along the applicant’s western border —with very restrictive rules for most of the year.

“No dogs, kites, bikes, vehicles, camping or fires. Pedestrians, equestrians: stay on wet sand.”



https://stateparks.oregon.gov/index.cfm?do=main.loadFile&load= siteFiles%2Fpublications%2F%2FSouth_Coast_plover_map - web014205.pdf

Staff report, p. 34 Coastal Shoreland Boundary Purpose Statement [in part] —
Coos County shall provide special protection to ... significant wildlife habitat ...

A conditional use is a use that would generally not be appropriate but for imposing conditions to ensure the use would not be detrimental to other permitted uses on surrounding properties. The application fails to compare intensities of uses and fails to consider compatibility with the Bandon State Natural Area (BSNA). As such the application is incomplete and the application should be denied.

Thank you for your careful consideration.

Sincerely,
Vickie Crowley
1425 Beach Loop
Bandon, Oregon 97411