Date: November 1, 2026

To: Coos County Planning Commission & Board of Commissioners

Care Of: Coos County Community Development Department

By Email: planning@co.coos.or.us

By Mail/Hand Delivery: Owen Building, 201 N. Adams St., Coquille, OR 97423

SUBJECT: Formal Opposition to File Nos. AM-26-002 (Comprehensive Plan Map Amendment) and RZ-26-001 (Rezone) — Peppermill, LLC

Dear Chair and Members of the Commission,

My name is **Carla Faganello**, and I reside at **87607 Two Mile Lane, Bandon, Oregon**. I am writing to formally enter my strong opposition to the Comprehensive Plan Map Amendment and Rezone application submitted by Peppermill, LLC regarding Tax Lots 1600, 1607, 1610, 1611, and 1616.

A rezone of this magnitude requires the applicant to meet a strict burden of proof. The applicant has failed to demonstrate compliance with Coos County's Comprehensive Plan criteria and Oregon's Statewide Planning Goals. I urge the Planning Commission to deny this request based on clear conflicts with Goals 3, 4, 11, 12, and 14.

1. Violation of Goal 3 (Agricultural Lands) & Goal 4 (Forest Lands): Failure to Demonstrate Non-Viability

Statewide Planning Goals 3 and 4 establish a strict presumption in favor of preserving resource lands. The applicant seeks to remove the Forest designation from these split-zoned parcels to make way for Rural Residential and Commercial configurations. However, the Coos County Comprehensive Plan mandates that resource land must remain protected unless it is proven entirely non-viable for agricultural or timber use. The applicant has not provided sufficient, objective evidence to prove that these parcels cannot sustain resource management. Allowing a rezone simply because a property is split-zoned compromises the integrity of Bandon's resource land base. It sets a dangerous precedent of incremental encroachment, inviting speculative rural development onto valuable farm and timber soils.

2. Critical Riparian and Wildlife Concerns: Requirement for ODFW Research

A significant environmental hazard exists regarding localized water systems, specifically China Creek and Two Mile Creek, which flow near or through the proposed rezoning area. Two Mile Creek is designated by the state as Essential Salmon Habitat. Introducing higher density rural residential development and commercial uses creates an unmitigated risk of surface and groundwater contamination. Runoff containing oils, chemicals, and fertilizers from

Exhibit 1

newly constructed homes, driveways, and commercial footprints will drain directly into these fragile riparian ecosystems. I request that the Planning Commission deny this application until the Oregon Department of Fish and Wildlife (ODFW) conducts comprehensive on-site research to analyze the cumulative ecological impacts of this development on salmonid spawning and protected wetlands.

3. Violation of Goal 11 (Public Facilities and Services): Septic and Aquifer Risks

Goal 11 requires that rural developments prove they can safely sustain localized public facilities without creating environmental or health hazards. Because this area lacks access to city sewer and municipal water lines, any future residential or commercial density would rely entirely on individual domestic water wells and onsite septic systems. The applicant has not demonstrated that the local aquifer can handle the cumulative drawdown of multiple new high-capacity wells without threatening the water security of existing neighbors on Two Mile Lane. Furthermore, fracturing these resource lands into 2-acre lots introduces a high density of septic drain fields into a localized area, risking groundwater contamination that can leach into the adjacent creeks. The Commission must protect our shared water supply and deny this expansion until rigorous hydrological and soil compatibility studies are provided.

4. Violation of Goal 12 (Transportation): Unmitigated Traffic Safety Hazards on Two Mile Lane

Under the state's Transportation Planning Rule (OAR 660-012-0060), a rezone cannot be approved if it significantly affects an existing transportation facility without mitigation. Two Mile Lane and China Creek Road are narrow, rural corridors built for low-density resource vehicles and existing local homes. They lack the structural framework—such as turn lanes, shoulders, and structural depth—to accommodate the heightened daily vehicle trips generated by a new residential subdivision or commercial zone. Increasing density here directly creates severe traffic safety hazards, particularly at the high-speed intersection where local traffic must merge onto Highway 101. The applicant has failed to provide a Traffic Impact Analysis (TIA) proving that our local road infrastructure can safely absorb this influx of vehicles.

5. Violation of Goal 14 (Urbanization): Unjustified Proliferation of Rural Density

Goal 14 dictates an orderly transition from rural to urban uses and strictly regulates development outside established Urban Growth Boundaries (UGBs). By requesting Rural Residential and potentially Commercial designations on these parcels, the applicant is attempting to introduce a level of density and use that is fundamentally urban or suburban in nature, rather than rural. These parcels still serve as an important buffer zone between existing rural clusters and intact resource lands. Approving a 2-acre minimum density or commercial zoning in this location violates the core purpose of Goal 14 by encouraging rural sprawl, which undermines the growth boundaries established to protect the City of Bandon.

Conclusion

The Peppermill, LLC application fails to justify the permanent elimination of protected resource lands, threatens our local traffic safety, surface waters, and groundwater capacity, and ignores the spatial constraints mandated by Goal 14. For these reasons, the application does not comply with Oregon land use law or the Coos County Comprehensive Plan. I respectfully request that the Planning Commission deny File Nos. AM-26-002 and RZ-26-001.

Thank you for your consideration of this testimony. Please include me as a party of record to receive all future staff reports and notices regarding this matter.

Sincerely,

Carla Faganello

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