LAND USE APPLICATION

OUTDOORSUPERSTAR, LLC

ROGGE MILL RV RESORT

File Number : HBCU-23-002, DR-23-123, AD-23-049, CHW Fee

COOS COUNTY CONDITIONAL USE LAND USE APPLICATION

SUBMIT TO COOS COUNTY PLANNING DEPT. AT 60 E. SECOND STREET OR MAIL TO: COOS COUNTY PLANNING 250 N. BAXTER, COQUILLE OR 97423. EMAIL PLANNING@CO.COOS.OR.US PHONE: 541-396-7770

If the fee is not included the application will not be processed

(If payment is received on line a file number is required prior to submittal)

Date Received: 12/1/23 *Receipt #:* 243942 *Amount:* $3192.50 *Received by:* C. Carr

This application shall be filled out electronically. If you need assistance please contact staff.

Applications shall be submitted by the property owner or a purchaser under a recorded land sale contract. "Property owner" means the owner of record, including a contract purchaser. The application shall include the signature of all owners of the property. A legal representative may sign on behalf of an owner upon providing evidence of formal legal authority to sign.

LAND INFORMATION

A. Property Owner(s) Outdoor Superstar LLC

Mailing address: PO 1345 Springfield, OR 97477

Phone: 541-914-3805 Email: outdoorsuperstar01@gmail.com

Township:	Range:	Section:	¼ Section:	1/16 Section:	Tax lots:
28S	14W	17	~~Select~~ C	Select	1000
Select	Select	Select	Select	Select	

Tax Account Number(s): 955501
Tax Account Number(s)

Zone: Select Zone Recreational (REC)
Please Select

B. Special Districts and Services

Water On-Site (Well or Spring) Sewage Disposal On-Site Septic

School Bandon Fire District Bandon RFPD

C. Type of Application (s) please consult with staff to determine prior to submittal

- [ ] Administrative Conditional Use for
- [x] Hearings Body Conditional Use for Recreational Vehicle Park
- [x] Historical, Cultural and Archaeological Resources, Natural Areas of Wilderness
- [ ] Beaches and Dunes
- [ ] Non-Estuarine Shoreland Boundary
- [ ] Significant Wildlife Habitat
- [x] Natural Hazards
  - [x] Flood [ ] Landslide [ ] Liquefaction [ ] Erosion [ ] Wildfires
- [ ] Airport Surfaces Overlay
- [ ] Variance to which standard

Include the supplemental application with all criteria addressed. If you require assistance with the criteria please contact a land use attorney or professional consultant. Property information may be obtained from a tax statement or can be found on the County Assessor's web page at the following links: Map Information Or Account Information

D. ATTACHED WRITTEN STATEMENT. With all land use applications, the "burden of proof" is on the applicant. It is important that you provide information that clearly describes the nature of the request and indicates how the proposal complies with all of the applicable criteria within the Coos County Zoning and Land Development Ordinance (CCZLDO). You must address each of the Ordinance criteria on a point-by-point basis in order for this application to be deemed complete. A planner will explain which sections of the Ordinance pertain to your specific request. The information described below is required at the time you submit your application. The processing of your application does not begin until the application is determined to be complete. An incomplete application will postpone the decision, or may result in denial of the request. Please mark the items below to ensure your submittal is complete.

Application Check List: Please make off all steps as you complete them.

☑ I. PROPOSAL AND CRITERIA: A written statement of intent, attached to this application, with necessary supporting evidence which fully and factually describes the following:

1. Project summary and details including time limes.
2. A complete explanation of how the request complies with the applicable provisions and criteria in the Zoning Ordinance. A planner will explain which sections of the Ordinance pertain to your specific request. You must address each of the Ordinance criteria on a point-by-point basis in order for this application to be deemed complete. This shall be addressed on the supplemental criteria page (see staff for criteria).

☑ II. PLOT PLAN OR SKETCH PLAN: A detailed drawing delineating the following:

- Owner's name, address, and phone number, map and Tax lot number
- North Arrow and Scale - using standard engineering scale.
- Accurate shape and dimensions of parcel, development site, including the lengths of the all property lines.
- Any adjacent public or private roads, all easements and/or driveway locations. Include road names. Driveway location and parking areas, including the distance from at least one property line to the intersection of the driveway and the road (apron area);
- All natural features, which may include, but are not limited to water features, wetlands, ravines, slope and distances from features to structures.
- Existing and proposed structures, water sources, sewage disposal system and distances from these items to each other and the property boundaries.

☑ III. DEED: A copy of the current deed, including the legal description, of the subject property.

☑ IV. CERTIFICATION: I certify that this application and its related documents are accurate to the best of my knowledge. I am aware that there is an appeal period following the date of the Planning Director's decision on this land use action. I understand that the signature on this application authorizes representatives of the Coos County Planning Department to enter upon the subject property to gather information pertinent to this request. If this application is refereed directly to a hearings officer or hearings body I understand that I am obligated to pay the additional fees incurred as part of the conditions of approval. I understand that I/we are not acting on the county's behalf and any fee that is a result of complying with any conditions of approval is the applicants/property owner responsibility. I understand that conditions of approval are required to be complied with at all time and an violation of such conditions may result in a revocation of this permit. If the property owner would like staff to contact a legal representative or consultant please provide the contact information using a consent form.

PROPERTY OWNER SIGNATURES REQUIRED FOR PROCESSING

12/01/23

ACCESS INFORMATION

The Coos County Road Department will be reviewing your proposal for safe access, driveway, road, and parking standards. There is a fee for this service. If you have questions about these services please contact the Road Department at 541-396-7660.

Property Address: 0 Highway 101 Bandon OR, 97411

Type of Access: State Hwy - Provide Access Permit ☑ Name of Access: Public

Is this property in the Urban Growth Boundary? No ☑
Is a new road created as part of this request? No ☑

Required parking spaces are based on the use of the property. If this is for a residential use two spaces are required. Any other use will require a separate parking plan submitted that is required to have the following items:

- Current utilities and proposed utilities;
- Roadmaster may require drawings and specs from the Oregon Standards Specification Manual (OSSC) (current edition).
- The location and design of bicycle and pedestrian facilities shall be indicated on the site plan if this is a parking plan;
- Location of existing and proposed access point(s) on both sides of the road where applicable;
- Pedestrian access and circulation will be required if applicable. Internal pedestrian circulation shall be provided in new commercial, office, and multi-family residential developments through the clustering of buildings, construction of walkways, landscaping, accessways, or similar techniques;
- All plans (industrial and commercial) shall clearly show how the internal pedestrian and bicycle facilities of the site connect with external existing or planned facilities or systems;
- Distances to neighboring constructed access points, median openings (where applicable), traffic signals (where applicable), intersections, and other transportation features on both sides of the property;
- Number and direction of lanes to be constructed on the road plus striping plans;
- All planned transportation features (such as sidewalks, bikeways, auxiliary lanes, signals, etc.); and
- Parking and internal circulation plans including walkways and bikeways, in UGB's and UUC's.

Additional requirements that may apply depending on size of proposed development.

a. Traffic Study completed by a registered traffic engineer.
b. Access Analysis completed by a registered traffic engineer
c. Sight Distance Certification from a registered traffic engineer.

Regulations regarding roads, driveways, access and parking standards can be found in Coos County Zoning and Land Development Ordinance (CCZLDO) Article 7.

By signing the application I am authorizing Coos County Roadmaster or designee to enter the property to determine compliance with Access, Parking, driveway and Road Standards. Inspections should be made by calling the Road Department at 541-396-7660

Coos County Road Department Use Only

Roadmaster or designee: _____

☐ Driveway ☐ Parking ☐ Access ☐ Bonded Date: Receipt #_____

File Number: DR-

SANITATION INFORMATION

If this is a request for a recreational, commercial, industrial, vacation rental, manufactured home park, mass or small gathering Coos Health and Wellness, Environmental Health Staff will be reviewing the proposal to ensure the use meets environmental health standards for sanitation and water requirements to serve the facility. If the proposal indicates that you are using a community water system a review may be required. A fee is charged for this service and shall be submitted with the application $83.00. If you have questions about regulations regarding environmental health services please call 541-266-6720. This form is required to be signed off for any type of subdivision, recreational, commercial, industrial, vacation rental, manufactured home park, mass or small gathering.

Water Service Type: On-site Spring ▼ Sewage Disposal Type: On-site septic ▼

Please check ■ if this request is for industrial, commercial, recreational or home base business use and complete the following questions:

- How many employees/vendors/patrons, total, will be on site?
- Will food be offered as part of the an on-site business?
- Will overnight accommodations be offered as part of an on-site business?
- What will be the hours of operation of the business?

Please check ☐ if the request is for a land division.

Coos County Environmental Health Use Only:

Staff Reviewing Application: _____

Staff Signature: _____

☐ This application is found to be in compliance and will require no additional inspections

☐ This application is found to be in compliance but will require future inspections

☐ This application will require inspection prior to determining initial compliance. The applicant shall contact Coos Health and Wellness, Environmental Heath Division to make an appointment.

Additional Comments:

SUPPLEMENTAL APPLICATION DOCUMENTS

OUTDOOR SUPERSTAR LLC
ADMINISTRATIVE CONDITIONAL USE
SUPPLEMENTAL APPLICATION DOCUMENT

APPLICATION OF OUTDOORSUPERSTAR LLC FOR AN ADMINISTRATIVE CONDITIONAL USE FOR A RECREATIONAL VEHICLE PARK

Organization of This Application

This application will be required to be heard by the Coos County hearings body. The hearing will be the first evidentiary hearing to review this application, exhibits and evidence submitted into the record to determine whether the requested amendment meets the applicable review criteria set forth in the Oregon Revised Statutes, Administrative Rules, Coos County Comprehensive Plan and Land Use and Development Ordinance (CCZLDO).

This application is organized and presented to the hearings body in accordance with the relevant review standards. Part 1 contains the introduction and background of this request. Part 2 addresses the requirements for consistency with the Q-REC zoning designation and the development standards located in CCZLDO Section 3.3.530. Part 3 addresses compatibility with adjacent uses and zoning districts. Part 4 will address the required Coos County Comprehensive Plan policies necessary to illustrate no adverse impacts on aquatic and natural features. Part 5 will evaluate will give findings towards studies produced to address overlays and onsite suitability. Consequently, in the discussion of the criteria under the County Land Use and Development Ordinance, where there is overlap in review standards, reference is made back to the relevant goal discussion to avoid needless repetition. Applicant's exhibits and figures are contained at the end of this application document. These exhibits are arranged to follow the flow of the Statewide Planning Goals.

I. INTRODUCTION & BACKGROUND

This matter comes before the Coos County Hearings Body on application filed by Outdoor Superstar LLC herein referred to as Applicant, which is owner of the subject property. The 25.60-acre property is located on the east side of State Highway 101 approximately 0.75 miles northeast of the City of Bandon. The subject property is identified in the Coos County Assessor's records as Tax Lot 1000, Section 17C, Township 28 South, Range 14 West, Property I.D. No 955501.

The applicant is requesting a 130 recreational vehicle park with associated amenities which falls under the development criteria of CCZLDO Section 3.3.530 (Administrative Conditional Use). The subject property is designated Q-REC (Recreation with Qualifications) and has additional coastal designations (Coquille River Estuary Management Plan (CREMP), CREMP Aquatic D08/D17 Conservation, CREMP Industrial and CREMP Shoreland Segment 16). The subject property is also subject to a number of Overlays including Archaeological Areas of Interest, Bandon Area of Mutual Interest, Bird Site Goal 5 Requirement, Floodplain, National Wetland Inventory Site and Natural Hazard Tsunami and Wildfire.

The requested Administrative Conditional Use as set out in the Coos County Zoning and Land Development Ordinance (CCZLDO) is primarily intended provide for an enhanced recreational opportunity in close proximity to the Coquille River and to utilize the maximum potential of the subject property with a comprehensive project consistent with the goals and policies of qualified recreationally zoned properties.

II. Q-REC CRITERIA AND SITE PLAN REVIEW

SECTION 3.3.530 DEVELOPMENT AND USE STANDARDS. The following are development standards for the CREMP-RC shoreland segments.

1. *Minimum Lot size:*

    a. *Refer to CREMP lot size Special Consideration Map.*
    b. *The dimension requirements must be meet.*

2. *Minimum Street frontage and minimum lot width is 20 feet.*

3. *Front setback is 20 feet.*

4. *Building height does not have any requirement, except those sites abutting a residential or controlled development zone shall have a max height of 35 feet plus one (1) additional*

III-478 Return to Top of Document foot in height for each foot of setback exceeding 5 feet (i.e. if the setback is 10, the maximum building height would be 40 feet). However, spires, towers, domes, steeples, flag poles, antennae, chimneys, solar collectors, smokestacks, ventilators or other similar objects may be erected above the prescribed height limitations, provided no usable floor space above the height limits is thereby added. Such over height object shall not be used for advertising of any kind.

FINDING: The proposed development does not include division of the subject property nor any structural development that is not consistent with the setback requirements as set forth above. The conceptual plan attached shows all recreational vehicle spaces are located well within the setback requirement. In addition, the permanent structural development that constitutes amenities to the RV Park are all setback a minimum of 50 feet from any property line.

5. Access and parking is regulated in chapter VII.

FINDING: Access and parking will be proposed and development consistent with the requirements set forth in Chapter VII, see attached conceptual plan.

6. Riparian Vegetation Protection. Riparian vegetation within 50 feet of a estuarine wetland, stream, lake or river, as identified on the Coastal Shoreland and Fish and Wildlife habitat inventory maps, shall be maintained except that:

   a. Trees certified as posing an erosion or safety hazard. property owner is responsible for ensuring compliance with all local, state and federal agencies for the removal of the tree.

   b. Riparian vegetation may be removed to provide direct access for a waterdependent use.

   c. Riparian vegetation may be removed in order to allow establishment of authorized structural shoreline stabilization measures.

   d. Riparian vegetation may be removed to facilitate stream or streambank clearance projects under a port district, ODFW, BLM, Soil & Water Conservation District, or USFS stream enhancement plan.

   e. Riparian vegetation may be removed in order to site or properly maintain public utilities and road right-of-ways. or

   f. Riparian vegetation may be removed in conjunction with existing agricultural operations (e.g. to site or maintain irrigation pumps, to limit encroaching brush, to allow harvesting farm crops customarily grown within riparian corridors, etc.) provided that such vegetation removal does not encroach further into the vegetation buffer except as needed to provide an access to the water to site or maintain irrigation pumps.

g. The 50 foot riparian vegetation setback shall not apply in any instance where an existing structure was lawfully established and an addition or alteration to said structure is to be sited not closer to the estuarine wetland, stream, lake, or river than the existing structure and said addition or alteration represents not more than 100% of the size of the existing structure's "footprint".

h. Riparian removal within the Coastal Shoreland Boundary will require a conditional use. See Special Development Considerations Coastal Shoreland Boundary.

i. The 50' measurement shall be taken from the closest point of the ordinary high water mark to the structure using a right angle from the ordinary high water mark.

FINDING: **The proposal does not involve disturbing or encroaching upon the 50-foot riparian vegetation protection area. The high bank area has been located and the conceptual plan demonstrates sufficient setback beyond the 50 foot requirement for all structural development. A dock project may be proposed in the future which will necessitate addressing the requirements of subsection 6, and the associated state and local permits however, the current proposal does not involve disturbing such areas.**

SECTION 5.6 DESIGN AND SITE PLAN REVIEW

SECTION 5.6.100. Purpose. The purpose and objectives of site development requirements and the site design review procedure are to:

1. Encourage originality, flexibility and innovation in site planning and development, including the architecture, landscaping and graphic design of said development;

2. Conserve the County's natural beauty and visual character and charm by insuring that structures and other improvements are properly related to their sites, and to surrounding sites and structures, with due regard to the aesthetic qualities of the natural terrain and landscaping, and that proper attention is given to exterior appearances of structures and other improvements;

3. Protect and enhance the County's appeal to tourists and visitors and thus support and stimulate business and industry and promote the desirability of investment and occupancy in marine and industrial properties;
4. Stabilize and improve property values and prevent blighted areas and thus increase tax revenues;

5. Achieve the beneficial influence of pleasant environments for living and working on behavioral patterns and, thus, decrease the cost of governmental services;

6. Foster civic pride and community spirit so as to improve the quality and quantity of citizen participation in local government and in community growth, change and improvement;

7. Sustain the comfort, health, tranquility and contentment of residents and attract new residents by reason of the County's favorable environment;

8. Assure that proposed structures are harmonious with the applicable zoning; and thereby promote and protect the health, safety and welfare of the County; and

9. Protect riparian vegetation which is needed to stabilize the shoreline and to maintain water quality and temperature necessary for the maintenance of fish habitat and spawning areas.

FINDING: The standards set forth in 5.6.100 1 through 9 have been factored into the development and are demonstrated in ample regard on the site plan. The property owner has placed the highest priority on ensuring the beautification of the property through a sound proposal and detailed plans in order to facilitate to aesthetically pleasing features to protect the integrity of surrounding areas. There has been a conscious effort to craft a plan that will focus on attracting new residents by instituting a development plan that will focus on the elements of the aforementioned criteria.

SECTION 5.6.200. Site Review and Approval Criteria. The County finds that excessive uniformity, dissimilarity, inappropriateness or poor quality of design in the exterior appearance of structures and the lack of proper attention to site development and landscaping in the: industrial and airport operations zone districts hinders the harmonious development of the County, impairs the desirability of residence, investment or occupation in the County, limits the opportunity to attain the optimum use and value of land and improvements, adversely affects the stability and value of property, produces degeneration of property in such areas with attendance deterioration of conditions affecting the health, safety and welfare of the County, and destroys a proper relationship between the taxable value of property and the cost of services thereof.

Further, the County finds that riparian vegetation is a resource which has been identified in the Comprehensive Plan.

FINDING: Refer to the attached conceptual plan that shows consistency with the intent of Section 5.6.200. There has been a significant effort to craft a plan that will add to the County in this area by utilizing landscaping features that will allow for attraction not deterrent.

SECTION 5.6.300. Jurisdiction.

1. Within any zone designation requiring a site plan review, no building permit or verification letter shall be issued for the erection or construction of a permitted or conditional use until the plans, drawings, sketches and other documents required under Section 5.6.500 have been approved by the Planning Director in conformity with the criteria specified in Section 5.6.400 (Criteria and Standards). For the purpose of this Section "Construction" shall include any remodeling that substantially changes the exterior appearance of the building.

2. Construction, site development and landscaping shall be carried out in substantial accord with the plans, drawings, sketches and other documents as approved.

3. Nothing in this subsection shall be construed to prevent ordinary repair, maintenance and replacement of any part of the building or landscaping which does not involve a substantial change from the purpose and objectives of Section 5.6.100. Proposed "substantial changes" shall be submitted to the Planning Director for approval.

4. All variances from the site development criteria which are deemed necessary by the applicant shall be requested pursuant to ARTICLE 5.3.

FINDING: The applicant/property owner has developed a plan that reflects consistency with all the necessary requirements located in CCZLDO and intends to carry in out with specificity upon receiving a tentative approval with conditions. All construction and development will directly correlate with Coos County condition compliance prior to the anticipation of receiving a Zoning Compliance Letter.

SECTION 5.6.400. Site Development Criteria and Standards. These standards are intended to provide a frame of reference for the applicant to the development of a site and building plans as well as a method of review. These standards shall not be regarded as inflexible requirements, nor do they advocate any particular architectural style, for they are intended to encourage creativity, invention and innovation. The following standards shall be utilized in reviewing the plans, drawings, sketches and other documents required under Section 5.6.500:

1. Landscaping.

a. The landscape shall be such to minimize soil erosion and lessen the visual impact;

b. any grade changes shall be in keeping with the general appearance of neighboring developed areas.

FINDING: The proposed landscaping proposed for the development will have no adverse impacts on the soil composition and have no visual impacts. In addition, all grading activities will be orchestrated in such a way as to be consistent with the general appearance of neighboring developing areas.

2. Structures.

a. Proposed structures shall be related harmoniously to the terrain and to existing buildings in the vicinity that have a visual relationship to the proposed buildings;

FINDING: Permanent structural development with only consistent of amenities typically associated with recreational vehicle park development. These structures include restroom units, a security unit and sports court areas. There are other nominal development areas that will entail two dog parks and a recreational fire pit area. The subject property is well suited to where this development will have a visual obstruction mainly due to natural features in the area (forest and river activity). The applicant finds that the development is consistent with Section 5.6.300.1.

b. the achievement of such relationship may include the enclosure of space in conjunction with other existing buildings or other proposed buildings and the creation of focal points with respect to avenues of approach, terrain features or other buildings.

FINDING: The proposed structural development will effectively tie the project together. Each structure will be in a location that has been carefully

considered due to the terrain and landscape and the Coos County applicable regulations.

3. Drives, Parking and Circulation. With respect to vehicular and pedestrian circulation, including walkways, interior drives and parking, special attention shall be given to the location and number of access points, general interior circulation, separation of pedestrian and vehicular traffic, and arrangement of parking areas that are safe and convenient.

FINDING: The subject property has existing access the proceeds directly off State Highway 101 and travels north easterly and caters specifically to the property. The proposed development encompasses instituting an onsite circulation plan that will allow consistency with CCZLDO and avoid any safety conflicts. Access into the property currently has 25-30 foot right of way width and the proposed improved onsite road is proposed to have a 26 foot right of way width allow for ingress and egress for future patrons. The lower and upper parts of the RV Park have several east/west roads that are currently 18 feet in width that are only utilized to access the recreational vehicle spaces directly adjacent. The main areas where intensified circulation will be developed to 26 feet. Parking areas will be facilitated in the normal regard as it relates to a RV Park type development. Parking spaces will be facilitated to each RV Park space along with ample 9' X 18' spaces for guests located in amenity areas. The proposal will also include ensuring the requirement amount of ADA assessable spaces are installed.

4. Surface Water Drainage. Special attention shall be given to proper site surface drainage so that removal of surface waters will not adversely affect neighboring properties, the public storm drainage system, or create environmental problems.

FINDING: The subject property is not located within an urban area where storm water facilities are available. The development proposes to mitigate runoff patterns on site. There will not be adverse impacts to neighboring properties directly related to drainage. The process will require calculating pre and post development cubic foot per second runoff numbers with the intent to ensure the project will not cause increase runoff in the area dispute the unavailability of storm connection. The development will be consistent with Section 5.6.300.4.

5. Utility Service.

a. Whenever feasible, electric, telephone and other utility lines shall be underground;

FINDING: All electrical and utility lines are proposed to be installed underground. The development is proposed to be consistent with Section 5.6.300.5

b. any utility installations remaining above ground shall be located so as to have an harmonious relation to neighboring properties and the site;

FINDING: There is no proposal for utility or electrical lines to be above grade.

c. the proposed method of sanitary sewage disposal from all buildings shall be indicated.

FINDING: The applicant/property are currently going through a Department of Environmental Health permitting process for a site evaluation. The development will include an onsite sanitation system that can properly treat the full capacity of the project.

6. Special Features.

   a. Exposed storage areas, exposed machinery installations, service areas, truck loading areas, utility buildings and structures and similar accessory areas and structures shall be subject to such setbacks, screen plantings or other screening methods as shall be reasonably required to prevent their being incompatible with the existing or contemplated environment and the surrounding properties;

   b. service, processing, and storage on property abutting a residential zone or commercial zone shall be wholly within an enclosed building or screened from view from such zone, street or highway by a permanently maintained, sight obscuring device or vegetation.

7. Application of Design Standards. The standards of review outlined in (1) to (6) above also apply to all accessory buildings, structures, exterior signs and other site features however related to the major buildings or structures.

8. Riparian Vegetation Protection:

   a. Riparian vegetation within 50 feet of a estuarine wetland, stream, lake or river, as identified on the Coastal Shoreland and Fish and Wildlife habitat inventory maps, shall be maintained except that:

      1) Trees certified by the Coos Soil and Water Conservation District, a port district or U.S. Soil Conservation Service posing an erosion or safety hazard may be removed to minimize said hazard; or

      2) Riparian vegetation may be removed to provide direct access for a water dependent use; or

      3) Riparian vegetation may be removed in order to allow establishment of authorized structural shoreline stabilization measures; or

      4) Riparian vegetation may be removed to facilitate stream or streambank clearance projects under a port district, ODFW, BLM, Soil & Water Conservation District, or USFS stream enhancement plan; or

      5) Riparian vegetation may be removed in order to site or properly maintain public utilities and road right-of-ways, provided that the vegetation to be removed is the minimum necessary to accomplish the purpose; or

      6) Riparian vegetation may be removed in conjunction with existing agricultural operations (e.g., to site or maintain irrigation pumps, to limit encroaching brush, to allow harvesting farm crops customarily grown within riparian corridors, etc.) provided that such vegetation removal does not encroach further into the

vegetation buffer except as needed to provide an access to the water for the minimum amount necessary to site or maintain irrigation pumps.

c. The 50 'riparian vegetation setback shall not apply in any instance where an existing structure was lawfully established and an addition or alteration to said structure is to be sited not closer to the estuarine wetland, stream, lake, or river than the existing structure and said addition or alteration represents not more than 100% of the size of the existing structure's "footprint." [OR 92-05-009PL]

Q-REC STANDARDS FOR QUALIFERS ON THE PROPERTY

1. Development on the subject property shall be subject to design and site plan review pursuant to Section 5.6.400 of the CCZLDO to be considered through a Hearings Body Review;

FINDING: Section 5.6.400 of the CCZLDO has been previously addressed. The property owner and applicant are prepared to offer testimony and presentation at a Planning Commission Hearing related to the proposed application.

2. The proposed rule uses, density, and public facilities and services will not commit adjacent or nearby resource land to non resource use as the term is defined in OAR 660-004-0028;

FINDING: An areawide analysis has been completed and covered in the next portion of the application materials. There is no proposal for division or conversion of the zone and therefore, consistency with Goal 2 is not applicable no the requirement to take an exception as determined by OAR 660-004-0028. All adjacent zoning districts and uses will be unaffected by the proposed application. See next section.

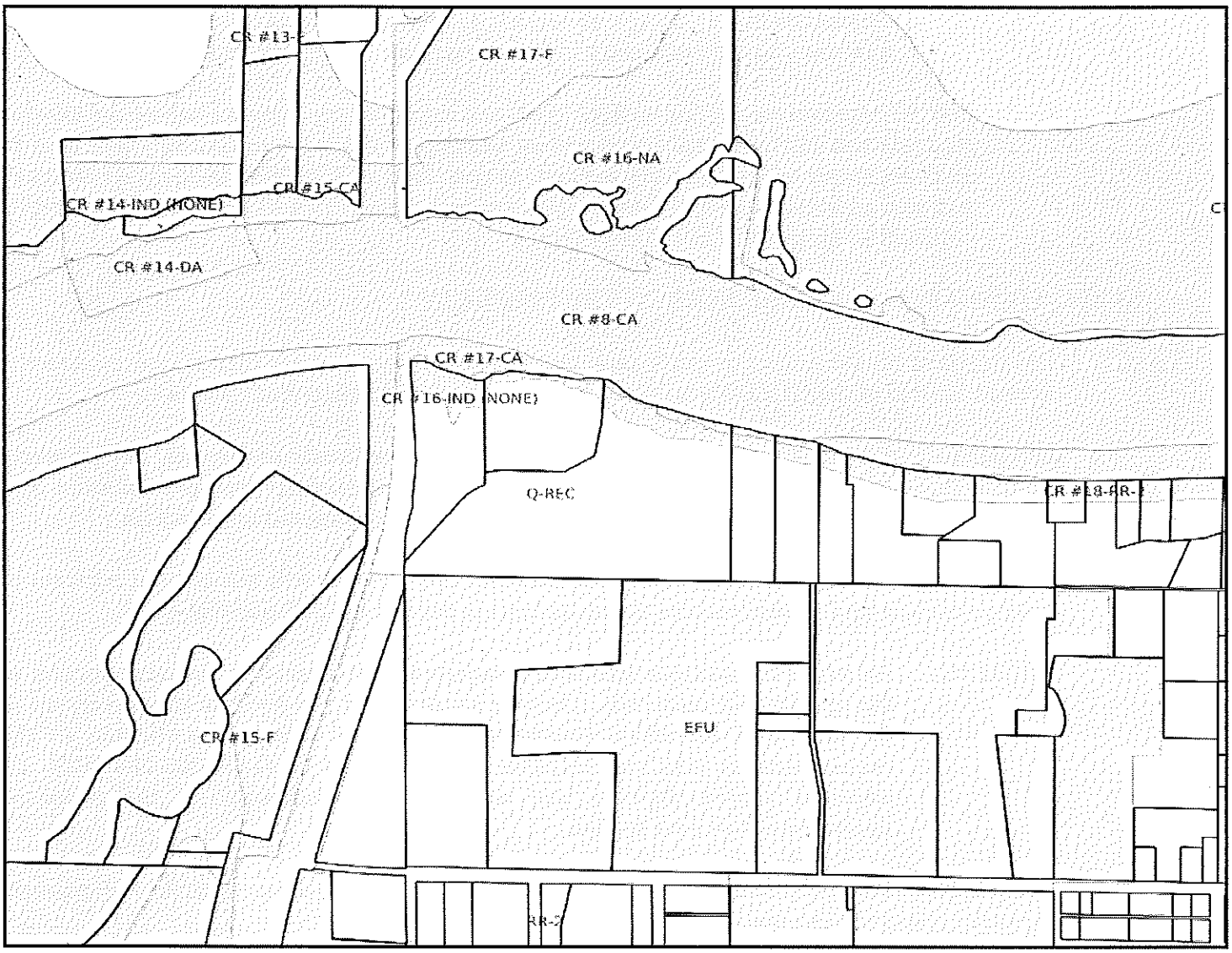
3. The proposed rural uses, densities, and public facilities and services are compatible with adjacent or nearby resource uses; and

FINDING: Please see the proceeding section for a comprehensive area wide analysis to illustrate compatibility.

4. The proposed rural uses will not seriously interfere with permitted uses on other nearby parcels.

FINDING: The application is for a recreational vehicle park that is consistent with the underlying zoning designation of Q-REC. As previously stated, the property has a dormant industrial use that creates more conflict and intensity than the proposal. Please see next section.

III. AREA CONSISTENCY AND COMPATIBILTY ANALYSIS



The subject property has a zoning designation of Q-REC that was created during a previous plan amendment and zone change application process. The property also has other zoning designations that are coastal and aquatic related, but will not particularly be hindered due to the development activities as the proposal taking place wholly and entirely with the Q-REC designated area. The zoning map above illustrates the zoning in the surrounding area. Directly to the north is the Coquille River and the next property beyond the river area is more than 700 feet. The river acts as a natural feature and buffer, however, the illustration of compatibility exits on the property directly to the north beyond the river. The property is zoned REC (recreational) and currently has an active recreational vehicle park (Coquille River RV Park) which has 48 recreational vehicle spaces along with an event center, a host structure and bathroom amenities.

Directly to the west is a significant roadway, State Highway 101 under the jurisdiction of the Oregon Department of Transportation. This road sits higher in elevation acting as a visual obstruction for the

property for any areas further to the west. Beyond the road are areas under the ownership and jurisdiction of the public and do not constitute private property. The composition of the area along with the hydraulic soils features render them incapable of any viable development and therefore, they act essentially as an extension of the river.

Directly to the south and adjacent are properties zoned for Exclusive Farm Use. The subject property had a previous use that was industrial in nature and during the active years of this operation caused no confliction or detriment to adjacent potential farm uses. The proposed development is considered less intensified in every respect as compared to an industrial type use. A closer look at the land and soil conditions to the EFU areas to the south would appear to hinder the ability to properly farm under any ORS 215.283 approved farm uses. However, there are some farm uses that are common with soil that is more hydraulically saturated. This particular property is currently receiving special assessment for active cranberry bogs. The proposed operation will create no conflict to the existing cranberry bog. Access points are completely separate and as previously explained, a recreational vehicle park is significantly less intense in regards to traffic, odor and noise than an industrial operation.

The nature of the proposed recreational vehicle park and how its currently planned is consistent with rural planning. There are no urban features related to the development. There are 130 recreational vehicle spaces proposed along with several structures that act as accessory. The subject property is currently 25.60 acres in size and with 130 spaces, it averages to be approximately 6 spaces per acre. There are no permanent residential components to the development, all recreational vehicle spaces are considered transient in nature and no park model type structural development is included. The property owner and applicant are determined to maintain the rural nature of the area and therefore, have proposed a plan that will allow for the perpetuation of those features.

Directly to the east are properties that are currently zoned Rural Residential – 2 Acre. These properties have a Goal 14 Urbanization exemption and constitute a pre-existing rural residential development. The residential nature of the land extends a significant distance easterly. There is only approximately an 80 acre area that is zoned EFU, the remaining areas around are all zoned RR2 and dedicated to residential use. The rural residential area surrounds the aforementioned 80 acres in almost an irrevocably committed fashion, see previous zoning map. This further illustrates the proposed development will be

consistent and compatible with adjacent zoning designation districts and uses and will cause no detriment to the minor potential farm use taking place to the south.

The applicant/property owner finds that the project is compatible with surrounding areas and uses. Furthermore, if minor compatibility issues are identified, they can be mitigated with reasonable conditions of approval.

COMPLIANCE WITH THE STATEWIDE PLANNING GOALS

The Statewide Planning Goals have been acknowledged as being applicable to the Coos County Comprehensive Plan. A proposal to amend the Comprehensive Plan and Zone must comply with all applicable Statewide Planning Goals unless an exception to one or more of the goals is proposed. There is no exception being proposed as part of this application. Coos County must make findings that Applicant's proposal complies with each of the relevant goals. The following information regarding the Statewide Planning Goals shows how this request complies with them.

Goal No. 1 - Citizen Involvement

To ensure the opportunity for citizen involvement in all phases of the planning process.

Coos County will provide written notice of the requested Administrative Conditional Use to surrounding property owners within 250 feet of the subject property not less than twenty days prior to the scheduled date of the first public hearing, and will cause public notice of Applicant's request and the scheduled public hearing to be published in the local newspaper pursuant to the requirements of CCZLDO Chapter 5, Section 5.0.900. Notice will also be given to affected state and local agencies, and other individuals and organizations that are legally entitled to such notice. These various forms of individual and public notice assure that local citizens have an opportunity to become informed about, and participate in, the public hearing process. The requested Administrative Conditional Use is being processed in a manner that assures full compliance with Statewide Goal No. 1.

Goal No. 2 - Land Use Planning

To establish a land use planning process and policy framework as a basis for all decisions and actions related to the use of land and to assure an adequate factual base for such decisions and actions.

Coos County has established policies and procedures, which require a detailed evaluation of any proposal to amend its Comprehensive Plan. Specific criteria and standards have been set forth

against which Applicant's amendment request must be evaluated in the light of relevant Findings of Fact. The County's ultimate decision in this matter will be based on the weight of those relevant Findings. As was noted in the introduction section of this document the proposed Administrative Conditional Use involves the conversion of 25.60 acres of land for a 130 space recreational vehicle park. The area proposed property is already considered recreational land.

The requested Administrative Conditional Use are being evaluated in a manner that assures full compliance with Statewide Goal No. 2.

Goal No. 3 - Agricultural Land

To preserve and maintain agricultural lands. Agricultural lands shall be preserved and maintained for farm use, consistent with the existing and future needs for agricultural products, forest and open space and with the state's agricultural land use policy expressed in ORS 215.243 and 215.700.

The land proposed for amendment is currently designated Q-REC land by the Coos County Comprehensive Plan and is therefore not protected as a Goal 3 resource. This finding is validated by the fact that the site has been determined to be non-resource land suitable for rural residential use and subsequently included within the County inventory of rural residential lands site as evidenced by the Coos County Comprehensive Plan. The proposed Administrative Conditional Use des not conflict with Statewide Goal No. 3.

Goal 4 - Forest Lands

To preserve forest lands for forest use.

The land proposed for amendment is currently designated Q-REC land by the Coos County Comprehensive Plan and is therefore not protected as a Goal 4 resource. This finding is validated by the fact that the site has been determined to be non-resource land suitable for recreational use and subsequently included within the County inventory of rural residential lands site as evidenced by the Coos County Comprehensive Plan. The proposed Administrative Conditional Use does not conflict with Statewide Goal No. 4.

On the basis of these findings, the subject property is not forestland as defined by Goal 4.

Goal No. 5 - Open Space, Scenic and Historic Areas, and Natural Resources

To conserve open space and protect natural and scenic resources.

Goal 5 addresses a variety of resources not specifically covered in other goals and sets out a process requiring inventory and evaluation. Steps in the process require that the level of significance of resources is determined, and if an identified resource appears to be significant, further evaluation is required. Such evaluation may lead to alternative courses of action, including fully protecting the identified resource.

Goal 5 addresses the following resources:

1. Open space.
2. Mineral and aggregate resources.
3. Energy resources.
4. Fish and wildlife areas and habitats.
5. Ecologically and scientifically significant resources.
6. Outstanding scenic views and sites.
7. Water areas, wetlands, watersheds and groundwater resources.
8. Wilderness areas.
9. Historic areas, sites, structures and objects.
10. Cultural areas.
11. Oregon recreational trails.
12. Wild and scenic waterways.

All of Coos County, including Applicant's property, has previously been subjected to extensive surveys and analyses intended to inventory and evaluate the Goal 5 resources listed above. These inventories, which are incorporated into the Coos County Comprehensive Plan, have previously received acknowledgment of compliance with Statewide Goal 5. Nevertheless, Applicant has conducted an independent evaluation of the potential impact of the proposed ACU on Goal 5 resources and proposes the following findings:

1. Land Needed or Desirable for Open Space

The subject property is typical of the majority of the lands in the western area of Coos County and contains no identified topographic or vegetative features that warrant protection under Goal 5. There is a large amount of land, which shares these same general characteristics surrounding the subject property. The proposed recreational vehicle park would result in an insignificant impact on open space resources in the surrounding area due to the abundant supply of open space with similar natural features. The site has not previously been identified by either the Coos County Comprehensive Plan as being needed or desirable for open space.

2. Mineral and Aggregate Resources

No mineral or aggregate resources requiring Goal 5 protection have been identified on or in the vicinity of the subject site.

3. Energy Sources

Goal 5 energy resources refers to sites and resources for the generation of energy (i.e. natural gas, oil, coal, hydroelectric, geothermal, uranium, and solar). No known energy sources have been identified on or in the vicinity of the property. The property does have solar access, but no more so than most other land in Coos County.

4. Fish and Wildlife Areas and Habitat

The subject property is adjacent to the Coquille River and the natural feature is position to the north. The County has found it necessary to place the following zoning designations to offer protections and additional regulations on natural features: (Coquille River Estuary Management Plan (CREMP), CREMP Aquatic D08/D17 Conservation, CREMP Industrial and CREMP Shoreland Segment 16). The site plan illustrates that the development will be constructed to allow no disturbance or hinderance on river or aquatic life. The proposed recreational vehicle park will be setback a sufficient distance from the river to maintain the necessary protections of the natural features. There have also been additional studies that give further evidence of the proposed projects consistency that will be addressed later in this report.

5. Ecologically and Scientifically Significant Natural Areas

No identified ecologically or scientifically significant natural areas are present on or in the vicinity of the subject site. As previously discussed, the Coquille River is positioned directly to the north, but the project offers no encroachment of any kind on river or aquatic life. The site plan gives full credence to a development offering no encroachment of any kind.

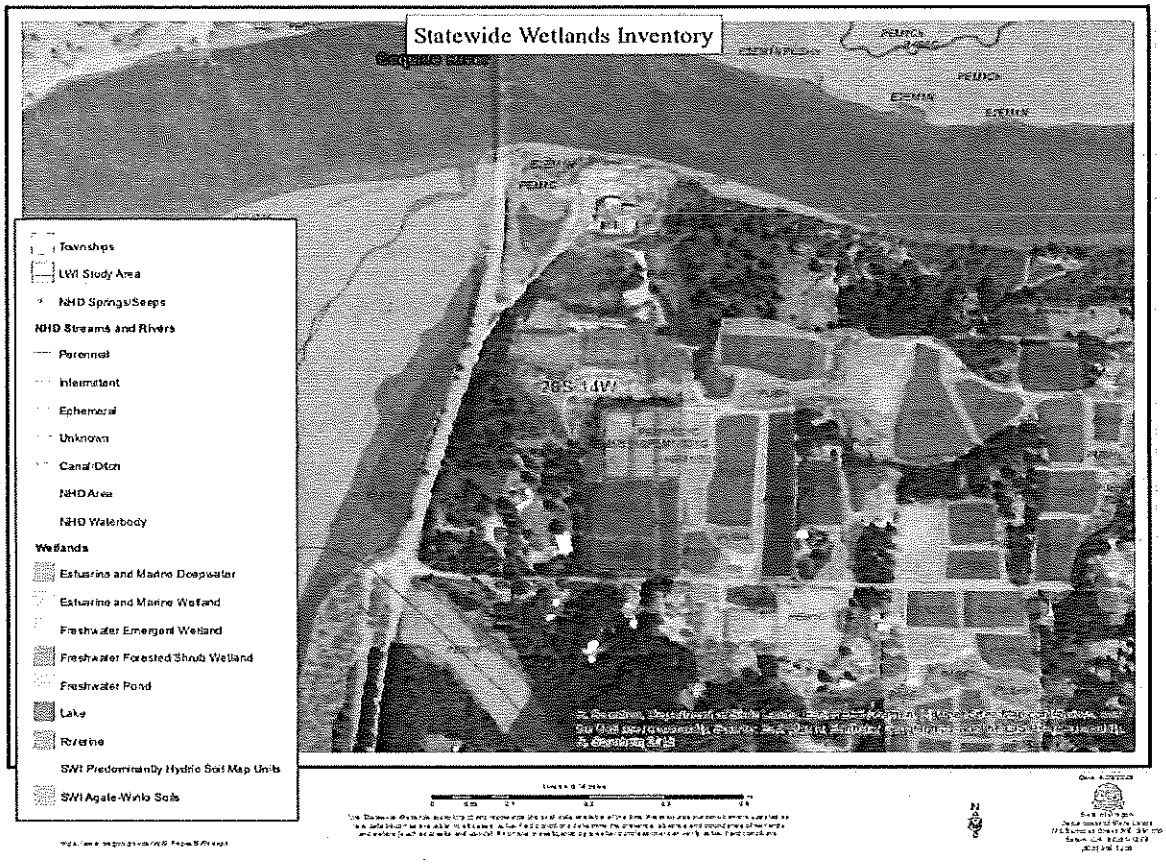
6. Outstanding Scenic Views and Sites

No identified scenic views or sites exist on the subject property. As noted under Open Space, above, the site has so much in common with many other locations in the general area that its scenic value is not considered unique or significant. The property possesses no prominent topographic features or vegetation, which would otherwise give it scenic significance.

7. Water Areas, Wetlands, Watersheds, and Groundwater Resources

The subject property contains no water areas (apart from the Coquille River previously discussed), watersheds or identified groundwater resources. Groundwater drawdown is minimized because of the large amount of incoming water, the redirection of runoff and used

water into the aquifer through engineered drainage and subsurface disposal, and maintenance and enhancement of existing vegetation cover. No complaints concerning depletion of water resources in adjacent similar areas have occurred. In order for an area to meet the Army Corps of Engineers' and the Oregon Division of State Lands' definition of wetland, three elements must be present: 1) water, 2) hydric soils, and 3) wetland vegetation. As identified below, the property has been identified to have some potential wetland features. A wetland delineation was conducted by Loran Waldron, certified biologist and the following was determined, 1) there are no wetlands or waters within the study area, which consists of the entire concrete slab that made up the working flood of the old wood products mill, 2) the entire road to the RV Park will remain within the established footprint of the access road to the old mill site, 3) no wetlands or waters of the state or United States are located within the project site study area and no wetlands or waters of the State or the United States will be impacted by this project, as currently planned.



8. Wilderness Areas

The subject site is not within, adjacent to, or part of, a designated wilderness area.

9. Historic Areas, Sites, Structures, and Objects

There are no identified or inventoried historic structures or objects on, or adjacent to, the subject property.

10. Cultural Areas

There are no identified or inventoried archaeological or cultural resources on the subject site.

11. Potential and Approved Oregon Recreation Trails

There are no designated or planned recreational trails on or adjacent to the subject site.

12. Wild and Scenic Waterways

The site is not within any designated or planned wild and scenic waterway, nor has such a designation been given to other lands or resources in the general vicinity of the subject property.

Based on the foregoing findings, there is no Goal 5 resource present requiring preservation action. The requested ACU will not conflict with any identified Goal 5 resources. The subject property has not been included in any inventory of needed open space or scenic areas, nor has it been identified in the Comprehensive Plan as having any historic, cultural or significant natural resources which need to be preserved and/or protected.

Goal No. 6 - Air, Water and Land Resources Quality

To maintain and improve the quality of the air, water and land resources of the state.

Statewide Goal 6 requires that air, land and water resources of the State be maintained and improved by assuring that future development, in conjunction with existing development, does not violate applicable state and federal environmental quality standards, and does not exceed the carrying capacity of local air sheds, degrade land resources or threaten the availability of such resources.

Any future land use activities on the property will be required to comply with all local, state and federal environmental regulations, thus assuring that the proposed ACU will not adversely impact the carrying capacity of local air sheds, degrade land and water resources or threaten the availability of such resources. Although the proposed rural residential land use designation on the property may result in at least some potential for environmental impacts if not properly monitored and regulated, both Coos County and the State of Oregon have sufficient regulatory measures in place so as to ensure that subsequent development will not produce any

unanticipated impacts. The proposed ACU has been evaluated in a manner that assures full compliance with Statewide Goal No. 6.

Goal No. 7 - Areas Subject to Natural Disasters and Hazards

To protect life and property from natural disasters and hazards.

The subject property has been identified as being within any identified floodplain area. Furthermore, the type of floodplain designation is considered an unnumbered A zone or an approximate A zone. This means floodway data is not available and development of this kind requires a one-foot cumulative effort analysis. This will be discussed at a later point in these findings. The property owner and applicant can assert in conjunction with Goal 7 that the development will not cause any detriment to a natural feature and poses no conflict with areas inundated by the floodplain. A HEC-RAS and floodway analysis has been completed by James Heyen, Registered Engineer in the State of Oregon that has dictated no rise will be created as a direct result of the proposed development.

Goal No. 8 - Recreational Needs

To satisfy the recreational needs of the citizens of the state.

Recreational needs for the general public have been provided for on numerous sites in the coastal area surrounding the subject property including Bandon Dunes Golf Course and the general areas of coastal features directly to the west. The Coos County Comprehensive Plan has not identified the subject property on any inventory for recreational facilities or opportunities, however the nature of the underlying proposes is to facilitate directly to this particular goal and creates uniform consistency. The proposed amendment will not conflict with Statewide Goal No. 8.

Goal No. 9 - Economy of the State

To diversify and improve the economy of the state.

The Statewide Economic Development Goal requires that local land use plans "*provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies*". Goal 9 is intended to be applied on a County-wide basis and requires that future economic growth be accommodated, in part, by ensuring that there is sufficient suitable land planned and zoned for commercial and industrial uses. The proposed Administrative Conditional Use do not involve, or otherwise impact, the county's

inventory of lands needed for economic development. The amendment and zone change will not conflict with the Statewide Economic Development Goal.

Goal No. 10 - Housing

To provide for the housing needs of the citizens of the state.

The primary purpose of Goal 10, within the context of amending the Comprehensive Plan, is to ensure that sufficient buildable land is available to allow for the full range of housing needs within the County to avoid creating shortages of residential land which would artificially restrict market choices in housing type, price range or location. The Coos County Comprehensive Plan requires that population growth be monitored and assessed for impacts on previous estimates of needed housing and the availability of sufficient land for residential use. As previously noted, the subject 25.60 acre site previously had an industrial operation that is no longer active. No existing housing will be displaced as a consequence of the proposed recreational vehicle park. The current zoning on the property is Q-REC which allows for specific uses and determined when it transition from another zone through a quasi-judicial process. However, consistency with Goal 10 can be well demonstrated with a recreational vehicle park due to the nature of the project. Housing, although transient in nature is provided in some fashion. Although RV spaces and uses are not permanent, it does allow residential convenience on a temporary basis.

Goal No. 11 - Public Facilities and Services

To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban development.

Statewide Goal No. 11 concerns the public facilities and services aspects of amending the Comprehensive Plan designation on the subject property from farm use to rural commercial use, and requires consideration of a system or plan that ensures the proper coordination of the types, locations and delivery of public facilities and services that best support existing and proposed land uses.

Applicant's property is situated in a rural area where public facilities and services are relatively limited, compared with the broad ranges of services that are available in urban areas. There are no public sanitary sewers in the vicinity of the property; however, the relatively low density of development permitted by the proposed rural residential designation and zoning on both the subject property and other surrounding rural residential properties facilitates the use of individual

subsurface septic systems subject to standards enforced by the Oregon Department of Environmental Quality. There is no public water service in the vicinity of subject property, however, all of the existing residential properties in the surrounding area are provided domestic water services by individual onsite wells or springs and there is no evidence of groundwater depletion as a result. Applicant intends to develop an onsite water source for future development of the property. Fire protection in the area is provided by Bandon Rural Fire District and police protection is provided by the Coos County Sheriff's Office.

The demand for other utilities and services, including electricity and communications, will be no greater than that resulting from the historic use of other adjoining and nearby properties. The proposed ACU will not adversely impact the present or future provision of public facilities and services in the surrounding area. This conclusion is based on consideration of the existing public service delivery systems and plans that are in effect within the surrounding area, and which are intended to ensure proper coordination of the types, locations and delivery of the public facilities and services necessary to support existing and proposed land uses in the area. The services that are available, or are proposed, to the subject property include those listed in the table below.

Table A
Public Facilities (Existing)

Public Facility	Provider
Water	Private Well
Sewer	Individual Septic System
Electric	Coos-Curry Electric CO-OP
Telephone	No public provider per Public Utility Commission
Solid Waste	Private
Police	Coos County Sheriff
Fire	Bandon Rural Fire District
Schools	School District No.
Road Access	Private Road

On the basis of the foregoing analysis, the subject property will be provided with an adequate level of public facilities and services, and such facilities and services will be delivered in a timely, orderly and efficient manner consistent with the purpose of Statewide Goal No. 11.

Goal No. 12 - Transportation

To provide and encourage a safe, convenient and economic transportation system.

The statewide transportation goal is intended to be applied on a countywide basis. Specific transportation-related policies and development standards are included within Coos County's Comprehensive Plan and land use ordinances to assure that the intent of the statewide transportation goal is implemented through the application of both state and local policies and standards at the time of development. The intent of Goal 12 is also implemented by the State Transportation Planning Rule (OAR 660, Division 12). OAR 660-12-060(1) requires that "*amendments to functional plans, acknowledged comprehensive plans, and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the identified function, capacity, and performance standards... of the facility*".

Four questions must be addressed to determine whether or not the proposed residential development will significantly affect a transportation facility as outlined in OAR 660-12-060(2):

A plan or land use regulation amendment significantly affects a transportation facility if it:

(a) Changes the functional classification of an existing or planned transportation facility;

(b) Changes standards implementing a functional classification system;
(c) Allows types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of a transportation facility; or
(d) Would reduce the performance standards of the facility below the minimum acceptable level identified in the TSP.

In order to ensure that a proposed land use change complies with the requirements of the Transportation Planning Rule, Coos County has adopted the following standard for intensified quasi-judicial applications (the applicant is not required to address but would like to be comprehensive):

(2) The applicant shall certify the proposed land use designations, densities or design standards are consistent with the function, capacity and performance standards for roads identified in the County Transportation System Plan.

(a) The applicant shall cite the identified Comprehensive Plan function, capacity and performance standard of the road used for direct access and provide findings that the proposed amendment will be consistent with the County Transportation System Plan.

Access to the subject property is directly from a private road that directly proceeds off State Highway 101. The functional classifications of transportation facilities within Coos County are identified in Table 3-3 of the Transportation Element of the CCZLDO. State Highway 101 is classified as a "Arterial".

Estimates of the average number of daily vehicle trips generated by a specific land use can be obtained from a number of reliable sources; however, the most commonly referenced source for such data is Trip Generation, published by the Institute of Transportation Engineers (ITE). Average daily trip generation rates published in the ITE's Edition of Trip Generation are based primarily on field data obtained from direct observation of actual land use activities. Trip generation rates are reported as an average of the often wide-ranging vehicle counts taken at numerous sites having the same classification of land use. Trip generation rates are often broken down into 24-hour time frames, and reported as "Average Daily Trips (ADT)". For most land use activities, including single-family rural dwellings, ITE defines an "average daily trip" as a one-way vehicular movement between a single origin and a single destination. For a single recreational vehicle space, trip generation rates are reported as a ratio of 3.6 vehicle trips per day per dwelling unit. Based on the maximum potential development density proposed, 130 spaces total, the subject property can be expected to generate an additional 468 ADT.

New developments generating fewer than 300 ADTs are generally considered to have no significant impact on local transportation facilities that serve a development site. The property utilized a private road that is directly off State Highway 101. Current traffic volumes on State Highway 101 are well below the facility's design capacity. Other public roads in the area are also adequate to accommodate both existing and potential future traffic volumes likely to be generated as a consequence of the requested recreational vehicle park. Kelly Sandow, Registered Engineer in the State of Oregon indicated in her report that the transportation system will no be adversely affected due to the development. Any new residential lots created as a consequence of the proposed recreational vehicle will be accessed by a privately maintained interior road system that will intersect with State Highway 101 on the western property line. There will also be an emergency access connection at the south end of the subject property.

A traffic impact analysis was completed by Kelly Sandow, registered licensed Engineer in the State of Oregon that dictated the proposed development will not cause a detriment to transportation patterns of the traffic network in the area.

On the basis of the foregoing, the proposed development, when taking into consideration the densities or design standards prescribed for uses permitted in the requested Q-REC zone, is consistent with the function, capacity and performance standard establish by Chapter 7 of the CCZLDO. Furthermore, the County's Transportation System Plan has received acknowledgement of compliance with the Statewide Transportation Goal and the Transportation Planning Rule (OAR Chapter 660, Division 12) by the Land Conservation and Development Commission, and therefore concludes that the facts set out above demonstrating compliance with the Transportation System Plan are sufficient to also demonstrate that the proposed amendment is consistent with both Goal 12 and the Transportation Planning Rule.

Goal No. 13 - Energy Conservation

To conserve energy.

The statewide energy conservation goal is intended to be applied on both a county-wide basis through the adoption of local energy conservation goals contained within the Comprehensive Plan, and on a site specific basis through the implementation of those Plan policies via property development standards intended to require land and uses developed on land to be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principals.

The subject property is located in an area dedicated primarily to non-resource uses and is approximately two miles south of the Bandon area boundary which is an established Goal 14 exception area. Consequently, existing and future development of this property has and will promote the efficient energy-related use of existing and planned public facilities and services. The site is in general proximity to an identified urban area and is free of any significant physical constraints that would otherwise require more energy to develop and use the property than would other property in the general area. Furthermore, specific energy conservation policies and development standards are included within the Coos County Comprehensive Plan, as well as in the County's land use ordinances, to ensure that the statewide energy conservation goal is implemented on a site-specific basis at the time of property development. The proposed ACU will not conflict with Statewide Goal No.13.

Goal No. 14 - Urbanization

To provide for an orderly and efficient transition from rural to urban land use.

Goal No. 14 requires local governments to establish urban growth boundaries that separate urban lands from rural lands. The proposed Administrative Conditional Use does not involve transition to another designation through a quasi-judicial plan amendment and zone change. The proposed development will constitute creating a less intensified use than what the property has been previously utilized for (industrial) but will maximize the property in a recreational capacity. The proposed application is consistent and proposes no conflict with Goal 14.

IV. CREMP POLICIES AND GOAL COMPLIANCE

POLICY #3: Use of "Coquille River Estuary Special Considerations Map" as the Basis for Special Policies Implementation Local governments shall use the "Coquille River Estuary Special Considerations Map" as the basis for implementing the special protection.

I. The "Coquille River Estuary Special Considerations Map" shall delineate the general boundaries (plan inventory maps contain more precise boundary locations) of the following specific areas covered by the Coquille River Estuary Management Plan:

   a. Coquille River 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. Dredged Material Disposal and Mitigation/Restoration Sites

   h. Significant Wildlife Habitat and Major Marshes

   i. Forest Lands The Special Considerations Map is NOT a substitute for the detailed spatial information presented on the CREMP's inventory maps.

The Special Considerations Map is merely an index guide designed as a zoning counter implementation tool that indicates when special policy considerations apply in a general area, thereby requiring inspection of the detailed plan inventory maps. The Special Considerations Map must and shall at all times accurately reflect the detail presented on the inventory maps (but at a more general scale).

II. Specific plan provisions set forth elsewhere as policy and relating to the above-listed considerations shall be used in conjunction with the Coquille River Estuary Special Considerations Map; such plan provisions include allowed uses and activities in each management unit, and the following specific "functional" policies set forth below: III-520 Return to Top of Document

#13 Overall Use Priorities within Coastal Shorelands

#14 General Policy on Uses within Rural Coastal Shorelands

#15 Land Divisions within Rural Shorelands

#16 Protection of Sites Suited to Water-Dependent Uses; and Special Allowance for New Non-Water-Dependent Uses is "Urban Water-Dependent (UW)" Units which are "Suitable for Water-Dependent Uses"; and Potential Sites Suited to Water-Dependent Uses; and Protection of Sites Suited to Water-Dependent Uses in Future Urbanizable Areas

#16a Rural, Urban, and Unincorporated Communities Use Standards

#16b Potential Sites Suitable for Water-Dependent Uses

#16c Protection of Sites Suited to Water-Dependent Uses in Future Urbanizable Areas

#17 Protection of "Major Marshes" and "Significant Wildlife Habitats" in Coastal Shorelands

#18 Protection of Historical, Cultural and Archaeological Sites

#19 Management of "Wet-Meadow" Wetlands within Coastal Shorelands

#20 Dredged Material Disposal Sites

#21 Mitigation and Restoration Sites #22 Mitigation Sites: Protection against Pre-emptory Uses

#22a Acquisition and Protection of Mitigation/Restoration and Dredged Material Disposal Sites

#23 Riparian Vegetation/Streambank Protection #24 Waste Water/Storm Water Discharge

#27 Floodplain Protection within Coastal Shorelands

#28 Recognition of LCDC Goal #3 (Agricultural Lands) Requirements for Rural Lands within the Coastal Shorelands Boundary

#29 Restricting Actions in Beach and Dune Areas that are "Unsuitable for Development"

#30 Restricting Actions in Beach and Dune Areas with "Limited Development Suitability"; and Special Consideration for Sensitive Beach and Dune Resources III-521 Return to Top of Document

#31 (Reserved)

#34 Recognition of LCDC Goal #4 (Forest Lands) Requirements for Rural Lands within the Coastal Shorelands Boundary

All other plan provisions - including allowed uses and activities - are subordinate to the special "functional" policies listed above.

III. This policy recognizes that the Coquille River Estuary Special Considerations Map:

a. is an official policy component of this estuary management plan; and

b. provides a mechanism for site-specific application of special management policies.

FINDING: **The underlying intent of this particular policy is to protect the integrity of natural features, more specifically beaches and shorelines. The subject property borders the Coquille River to the north and has some stretches of CREMP protected areas. The pre-application materials indicate some of the development including the roads and parking area protrude into CREMP protected areas to the south. The applicant and property cannot substantiate this claim, as the conceptual plan and preliminary proposal illustrates no encroachment. Management plans or policies should not be necessary in conjunction with the proposal.**

POLICY #14: General Policy on Uses within Rural Coastal Shorelands

I. Coos County shall manage its rural areas with the "Coquille River Coastal Shorelands Boundary" by allowing only the following uses in rural shoreland areas, as prescribed in the management units of this Plan, except for areas where mandatory protection is prescribed by LCDC Goal #17 and #18:

a. farm uses as provided in ORS 215;

b. propagation and harvesting of forest products consistent with the Oregon Forest Practices Act;

c. private and public water-dependent recreation developments;

d. aquaculture; III-533 Return to Top of Document

e. water-dependent commercial and industrial uses, water-related uses and other uses only upon a finding by the county that such uses satisfy a need which can not be accommodated on uplands or in urban and urbanizable areas or in rural areas built upon or irrevocably committed to non-resource use;

f. single family residences on lots, parcels, or units of land existing on January 1, 1977 when it is established that:

   1. the dwelling is in conjunction with a permitted farm or forest use, or

   2. the dwelling is in a documented "committed" area, or

   3. the dwelling has been justified through a goal exception, or

   4. such uses do not conflict with the resource preservation and protection policies established elsewhere in this Plan;

g. any other uses, provided that the Board of Commissioners determines that such uses satisfy a need which cannot be accommodated at other upland locations or in urban or urbanizable areas. In addition, the above uses shall only be permitted upon a finding that such uses do not otherwise conflict with the resource preservation and protection policies established elsewhere in this Plan.

This strategy recognizes (1) that Coos County's rural shorelands are a valuable resource and accordingly merit special consideration, and (2) that LCDC Goal #17 places strict limitations on land divisions within coastal shorelands. This strategy further recognizes that rural uses "a" through "g" above, are allowed because of need and consistency findings documented in the "factual base" that supports this plan.

FINDING: **The proposed development is consistent with Policy #14 as set forth in subsection g above. The application will be required to be placed before the body of the Planning Commission. The proposed development of a recreational vehicle park has been widely accepted as suitable in close proximity to river or nature features due to the type of amenity it provides. In addition, the conceptual plan clearly dictates no encroachment into the CREMP area as it pertains to structural development. However, is consistency is still required, it should be apparent that one future major amenity the proposal will include is a dock location, which creates water dependency.**

POLICY #27: Floodplain Protection within Coastal Shorelands

The respective Flood Regulations of local governments set forth requirements for uses and activities in identified flood areas; these shall be recognized as implementing ordinances of this Plan. This strategy recognizes the risk of substantial loss of stock and property damage resulting from the widespread flooding of the Coquille River Valley floor which occurs during most winters.

FINDING: **The subject property has been determined to be partially inundated in the Floodplain, as regulated by Coos County under the guidance of the National Flood Insurance Program (NFIP). The property owner has engaged and contracted with a private engineer qualified to perform an analysis necessary to dictate the development will not cause a rise in flood waters in the event of a 100-year flood event. This study has been attached and will be discussed further at a later point in the application materials.**

V. UTILITY COMPLIANCE

I. Sanitation

The applicant/property owner are proposing a 130 space recreational vehicle park with amenities. The property has been thoroughly analyzed by Paul Kennedy, register soil scientist to determine how sanitation can be properly facilitated. The attached memo prepared by i.e. Engineering indicates the following in regards to the sanitation system " *Each unit will have a standard RV sewer hookup. The raw sewerage from the site will flow by gravity to one of the onsite septic and dose tanks. The septic tanks will be sized to serve up to 12 RV units each. The dose tanks contain pumps to force the effluent into the proposed onsite force main. The force main will connect all of the dose tanks to transfer the effluent to the approved treatment area that is located in the southeast corner of the site. After treatment, the treated effluent will be pumped into a bottomless sand filter."*

In addition, the attached utility plans outline the proposed septic and drainfield system proposed to meet the sanitation requirements. The southeast area of the property is proposed to be utilized for the septic tank and drainfield area after being tested (14 test pits as described above). Ground water studies, a sewer design report and construction details will be prepared for DEQ's WPCF permit.

The proposed sanitation system will serve the recreational vehicle parks proposed spaces and amenities and fully meet the requirements set forth by Coos County and the Department of Environmental Quality. The subject property was previously consolidated into one lot and therefore, the sanitation system only serves proposed development located on one lot of record. The applicant finds the proposed sanitation meets all the requirements of CCLZO and DEQ.

II. Water

In a similar regard to the sanitation system requirement for the proposed 130 space recreational vehicle park, domestic water use is a necessary and required

amenity. The attached memo drafted by i.e. Engineering illustrates how domestic water will be facilitated to the site and the proposed development. Water will be supplied via two onsite wells that are located on the western and south central portions of the property (see attached utility plan). As stated in the memo "*The estimated water needs for the entire development, when at 100% capacity and completely full, is 15,000 gallons per day. At this peak capacity, pumping at the well yield of 39.5 gallons per minute, 15,000 gallons of water will require the well to be pumped 6 hours and 20 minutes per day. This would leave on average, over 17 hours a day for the well to recharge, on days when the RV Resort is at full capacity. On days when the resort is not a full capacity, the well would be pumped less and have more recharge time than the numbers listed above.*"

The existing and proposed wells have ample capacity to address domestic water usage needs for the proposed development. There will also be a water storage component to the plan and a tank is proposed to be installed to achieve storage needs. *"To help regulate the pumping of the well, water from the well will be pumped into a small storage reservoir that will be located at the top end of the RV Resort. This tank will be sized at approximately 15,000 gallons providing a full day of storage for the resort at full capacity. Water from the well will be treated and pumped up to the storage reservoir. From the storage reservoir, water will then be conveyed via separate a waterline to the RV Resort for direct use. The reservoir water tank will be elevated as needed to provide adequate water pressure for use."*

Water treatment requirements will also need to be addressed and the applicant/property owner is proposing to do so by installing an ultraviolet water treatment system to disinfect the water that is pumped from the well prior to being pumped into storage. This installation will be consistent with rural type developments and has been proven to be environmentally friendly. Plans will be constructed and submitted in regard to the proposed treatment process.

III. Access & Traffic

A traffic impact analysis was completed by Kelly Sandow, a registered licensed Engineer in the State of Oregon. The findings of the analysis are attached that indicate the proposed project (1) has adequate channelization for turns into the site, (2) volume to capacity standards are met, (3) the queuing at full capacity of the RV Park will not exceed the available storage and (4) the sight departure and stopping sight distances are met. The applicant asserts the proposed development will cause no adverse impacts to the transportation system.

VI. OVERLAY COMPLIANCE

I. Wetlands

As previously discussed in Statewide Planning Goal 5 above, the property has some existing wetland activity as determined by the department of state lands. The northwestern portion of the property more particularly has freshwater emergent wetland activity. Laron Waldron, Biologist, and wetland delineator

reviewed the property and the potential development. After a full delineation was completed, it was further determined there are no existing state or federal wetlands located in the area where the proposed development will be constructed. The analysis and report was completed in June of 2021 placing it well within the required five year time frame for reviewing potential encroachments. Please refer to the attached report from Mr. Waldon along with findings above the further address wetland natural features.

II. Floodplain Compliance

The subject property, according to the Coos County affective FIRM no. 41011C0494F has been determined to be located in an unnumbered or approximate A zone. These areas lack full data that would help differentiate between appropriate flood zones that would be clear in numbered A zones. There is no clear understanding where the floodway versus the floodplain is located and how the property can be affected by inundation. The property owner utilized the services of West Consultants, INC (James Heyen, professional engineer) in order to perform a HEC-RAS analysis. The necessary technical memorandum is attached hereto and determines the area proposed for development is not located in and offers no encroachment within the regulatory floodplain.

The applicant/property owner finds the project is consistent with the requirements of the floodplain article of the CCZLO. In addition, the area proposed for development will not require any elevation due to also being located outside of the floodplain (see figure 4 in attached tech memo).

III. Archaeological Activity

The State Historic Preservation Office regulates properties and structures where historic or archeological type activity may be prevalent. It is important to take stock of any items or resources that may be in need of protection because they hold some historic or archaeological value. Mark Tveskov (Black Dog Archaeology, LLC) was tasked with evaluated the site and providing a cultural resource inventory. A site visit and evaluation was conducted on February 13, 2023 in conjunction with the anticipation of the recreational vehicle park buildout. The attached report dictates "*Finally, significant archaeological resources are known or reported to be located within the vicinity of the property and the Coquille Indian Tribe regards the area as sensitive for cultural resources. There is always a potential that cultural resources could be encountered when a property is developed and ground disturbance occurs. Archaeological sites and objects—even those that have not been previously identified—are protected under Oregon law on both state and private lands (e.g., ORS 97.740-760). In the event that archaeological objects, features, or a site be encountered, all work within the immediate area should be stopped and appropriate Indian Tribe, the Oregon State Historic Preservation Office, or a professional archaeologist should be contacted.*"

The applicant/property owner understand and concede this area may have some historical archaeological activity. During the development process if any items in

this regards are identified, all development activities will be stopped while fully cooperation with the State Historic Preservation office is achieved.

VII. CONCLUSION

The applicant/property owner asserts the proposed development is consistent with the criteria located in the CCLZO by virtue of the following findings:

FINDING: A recreational vehicle park development is identified as a conditionally permitted use in the Q-REC zoning to which the property is designated. Due to previous industrial uses of the subject property and the lack of any farm or forest operations taking place around the subject property, the development can be considered to be compatible.

FINDING: The proposed development will include 130 recreational vehicle spaces that will occupy each space a maximum of 30 days or less. In addition, other buildings proposed in conjunction to the development are considered amenities and act as incidental to the main proposed use because they are structures that you would typically find in recreational vehicle parks.

FINDING: The proposed development will cause no detriment or encroachment on river or riparian vegetative features, regulatory floodway areas, regulated state or federal wetlands or special coastal protected areas.

FINDING: The proposed development does not require taking an exception to Goal 14 for urbanization because all recreational vehicle spaces are temporary (30 days or less) and the utilities will only service one lot or parcel which is in keeping with the requirements surrounding development on rural land.

FINDING: The applicant has submitted a conceptual plan, drafted by a licensed engineer that illustrates the organization of the park will allow for development to achieve minimum impacts with the surrounding areas.

FINDING: The applicant/property has received approval from the Department of Environmental Quality for the type of sanitation system and drainfield that will serve the proposed development. A report has been submitted from Bandon Wells that provides ample proof the existing wells located on the property can serve the proposed use.

FINDING: Access to the property is sufficient to service the proposed recreational vehicle park and the proposed use is not anticipated to have any detrimental impact on the transportation system in the area. In addition, the proposed use has been determined to produce less traffic than the previous industrial type of use that occupied the property.

FINDING: The proposed recreational vehicle park offers an important amenity to the area given the proximity of the urban growth boundary of Bandon and Highway 101 adjacent to the property located westerly. Transient type parks allow travelers conveniences that are imperative to purpose of statewide planning goal 8.

FINDING: The proposed application for a recreational vehicle park through a conditional use should be approved by Coos County Planning Commission due to its consistency with the CCLZO and other state/local provisions.

PRE-APPLICATION INFORMATION PACKET

Coos County Planning Department
CoosCounty Courthouse Annex, Coquille, Oregon 97423
Mailing Address: 250 N. Baxter, CoosCounty Courthouse, Coquille, Oregon97423
Physical Address: 60 E. Second St, Coquille, Oregon
(541) 396-7770
TDD (800) 735-2900
planning@co.coos.or.us
Jill Rolfe, Community Development Director

FILE # PA-22-005

DATE/TIME OF MEETING: November 22, 2022 @ 3:30 p.m.

LOCATION: Coos County Planning Department
60 E. Second St, Coquille

Please join my meeting from your computer, tablet or smartphone.
https://meet.goto.com/245800237

You can also dial in using your phone.
United States: +1 (312) 757-3121

Access Code: 245-800-237

APPLICANT(S): Thomas McIntosh

AGENCIES/DEPARTMENT: Hui Rodomsky, DLCD
Paul Slater, Coos County Roadmaster
Oregon Department of Transportation
Oregon Department of Environmental Quality
Coquille Indian Tribe & Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians
City of Bandon Public Works
Oregon Water Resources Department
US Fish & Wildlife and Oregon Department Fish & Wildlife
Coos County Building Codes
Coos County Public Health

LEGAL DESCRIPTION: Township 28S Range 14W Section 17C Tax Lots 1000, 1001, 1002

PROPERTY ZONING AND SPECIAL CONSIDERATION OVERLAYS:

28S1417C0-01000

ZONING
COQUILLE RIVER ESTUARY MGT PLN (CREMP)
CREMP AQUATIC D08 CONSERVATION (CRA08C)
CREMP AQUATIC D17 CONSERVATION (CRA17C)
CREMP INDUSTRIAL (CR-IND)
CREMP SHORELAND SEGMENT 16 (CRS16)
RECREATION WITH QUALIFICATIONS (Q-REC)

SPECIAL CONSIDERATION OVERLAYS
ARCHAEOLOGICAL AREAS OF INTEREST (ARC)
BANDON AREA OF MUTUAL INTEREST (BMI)

BIRD SITE MEETS GOAL 5C REQRMT (B5C)
FLOODPLAIN (FP)
NATIONAL WETLAND INVENTORY SITE (NWI)
NATURAL HAZARD - TSUNAMI (NHTHO)
NATURAL HAZARD - WILDFIRE (NHWF)

28S1417C0-01001

ZONING
COQUILLE RIVER ESTUARY MGT PLN (CREMP)
CREMP AQUATIC D08 CONSERVATION (CRA08C)
CREMP INDUSTRIAL (CR-IND)
CREMP SHORELAND SEGMENT 16 (CRS16)
RECREATION WITH QUALIFICATIONS (Q-REC)

SPECIAL CONSIDERATION OVERLAYS
ARCHAEOLOGICAL AREAS OF INTEREST (ARC)
BANDON AREA OF MUTUAL INTEREST (BMI)
BIRD SITE MEETS GOAL 5C REQRMT (B5C)
FLOODPLAIN (FP)
NATIONAL WETLAND INVENTORY SITE (NWI)
NATURAL HAZARD - TSUNAMI (NHTHO)
NATURAL HAZARD - WILDFIRE (NHWF)

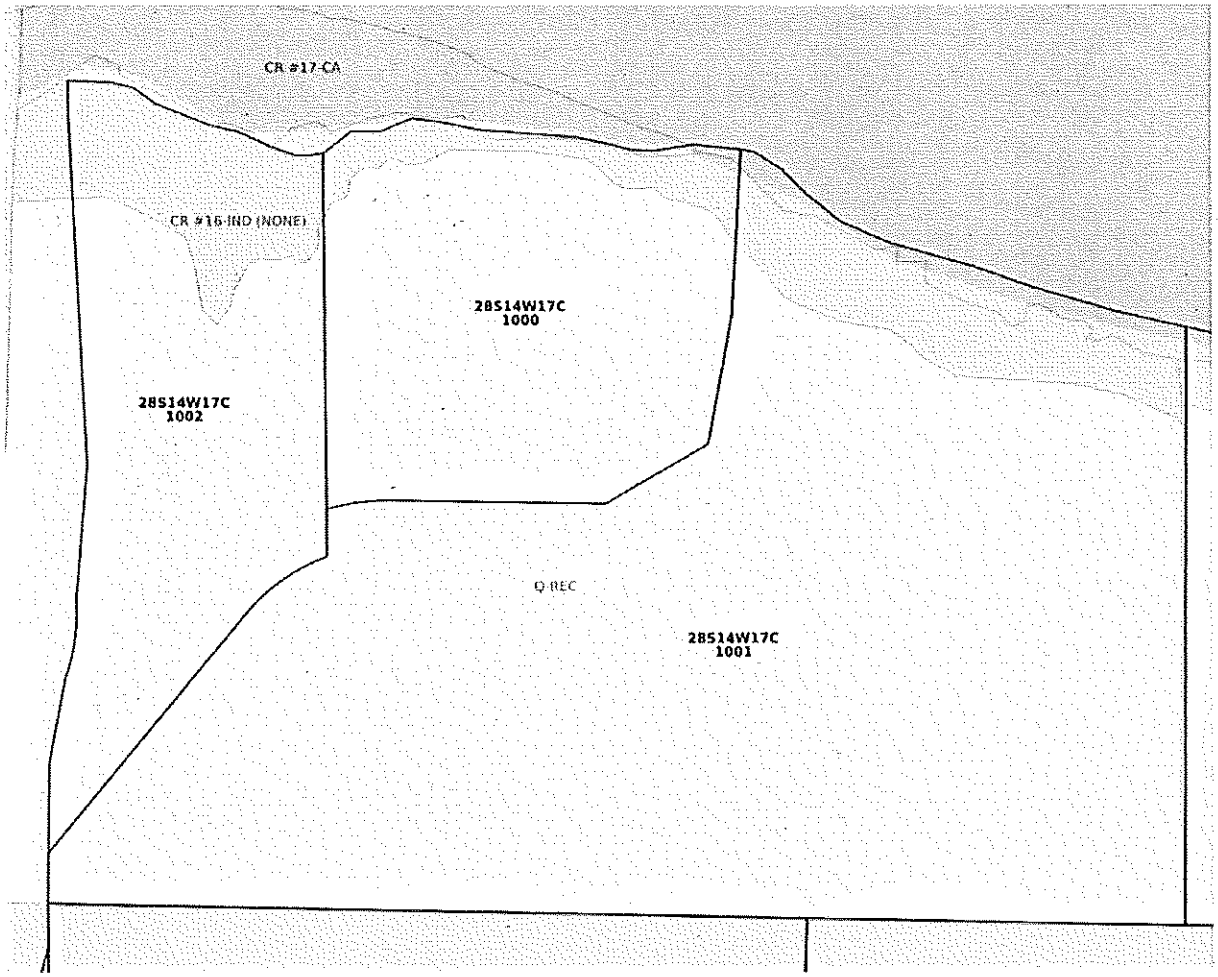
28S1417C0-01002

ZONING
COQUILLE RIVER ESTUARY MGT PLN (CREMP)
CREMP AQUATIC D17 CONSERVATION (CRA17C)
CREMP INDUSTRIAL (CR-IND)
CREMP SHORELAND SEGMENT 16 (CRS16)
RECREATION WITH QUALIFICATIONS (Q-REC)

SPECIAL CONSIDERATION OVERLAYS
ARCHAEOLOGICAL AREAS OF INTEREST (ARC)
BANDON AREA OF MUTUAL INTEREST (BMI)
BIRD SITE MEETS GOAL 5C REQRMT (B5C)
FLOODPLAIN (FP)
NATIONAL WETLAND INVENTORY SITE (NWI)
NATURAL HAZARD - TSUNAMI (NHTHO)
NATURAL HAZARD - WILDFIRE (NHWF)

REQUEST: Discuss the possibilities of development this site. The applicant would like to site 130 RV Spaces, minor a clubhouse and small retail store. The applicant's drawing indicated a siting a future dock. That potential dock was not requested with the pre-app meeting and will be addressed in a future pre-app meeting. The applicant's drawing did not indicate the source of water or septic on the subject property.

Current Zoning
A zone boundary interpretation was completed for this property and below is the official zone. The light green color represents Coquille River Estuary Management Plan Shoreland Segment #16, the light blue color represents Coquille River Estuary Management Plan Aquatic Segment #17, and the yellow color represents the Qualified – Recreation zoning district.



The majority of the zone is Q-REC with the qualifier that if an RV Park is to be sited on this property a site plan will be required. The boundary follows the vegetation lines. The portion that is zoned Coquille River Estuary Management Plan Industrial Segment 16 (CREMP 16-INDS). The interpretation of the zone boundary was made based on Floodplain and riparian information provided in 2004. The boundary follows the vegetation.

The plot plan provided shows some development proposed in the CREMP 16-INDS including some of the roads and parking areas which would be accessory to the recreational use. In the 16-INDS, High-Intensity Recreation is allowed subjected to an Administrative Conditional Use (ACU) review addressing policies #3 (bay wide Policies), #14, #27 and development and use standards in Section 3.3.530

Policy #3 requires resource protection of any inventoried areas. Policy# 14 sets a priority use list for sites in the Costal Shoreland Boundary. This property is within the CSB. The two possible priorities the use could comply with is:
(c) Private and public water-dependent recreational developments; or
(e) Water-dependent commercial and industrial uses, water-related uses and other uses only upon a finding by the county that such uses satisfy a need which cannot be accommodated on uplands or in urban and urbanizable areas or in rural areas built upon or irrevocably committed to non-resource use

The rest of the proposal seems to be located in the Q-REC, the "Q" standards for qualifier on this property. The qualifiers that apply to the portion zoned REC are:

1. Development on the subject property shall be subject to design and site plan review pursuant to Section 5.6.400 of the CCZLDO to be considered through a Hearings Body Review;
2. The proposed rule uses, density, and public facilities and services will not commit adjacent or nearby resource land to nonresource use as the term is defined in OAR 660-004-0028;
3. The proposed rural uses, densities, and public facilities and services are compatible with adjacent or nearby resource uses; and
4. The proposed rural uses will not seriously interfere with permitted uses on other nearby parcels.

I have attached the criteria that are reference in qualifier that applies to this property. In order to remove the qualifiers a new exception would be required.

All additional rules and regulations under the Coos County Zoning and Land Development Ordinance regarding the permitting of RV parks will apply. The applicable criteria may be found in the zoning ordinance located at this link: https://www.co.coos.or.us/community-dev/page/coos-county-zoning-and-land-development-ordinances

The background files on these properties are very large and will be available for the applicant to review but staff has not listed or attached all the background because this a preliminary use request.

If you have any questions, please call at 541-396-7770, e-mail planning@co.coos.or.us, mail to 250 N. Baxter, Coquille, OR 97423 or visit us at the office 60 E. Second St.

Chris MacWhorter
Principal Planner

ARTICLE 5.6 DESIGN AND SITE PLAN REVIEW

SECTION 5.6.100. Purpose. The purpose and objectives of site development requirements and the site design review procedure are to:

1. Encourage originality, flexibility and innovation in site planning and development, including the architecture, landscaping and graphic design of said development;

2. Conserve the County's natural beauty and visual character and charm by insuring that structures and other improvements are properly related to their sites, and to surrounding sites and structures, with due regard to the aesthetic qualities of the natural terrain and landscaping, and that proper attention is given to exterior appearances of structures and other improvements;

3. Protect and enhance the County's appeal to tourists and visitors and thus support and stimulate business and industry and promote the desirability of investment and occupancy in marine and industrial properties;

4. Stabilize and improve property values and prevent blighted areas and thus increase tax revenues;

5. Achieve the beneficial influence of pleasant environments for living and working on behavioral patterns and, thus, decrease the cost of governmental services;

6. Foster civic pride and community spirit so as to improve the quality and quantity of citizen participation in local government and in community growth, change and improvement;

7. Sustain the comfort, health, tranquility and contentment of residents and attract new residents by reason of the County's favorable environment;

8. Assure that proposed structures are harmonious with the applicable zoning; and thereby promote and protect the health, safety and welfare of the County; and

9. Protect riparian vegetation which is needed to stabilize the shoreline and to maintain water quality and temperature necessary for the maintenance of fish habitat and spawning areas.

SECTION 5.6.200. Site Review and Approval Criteria. The County finds that excessive uniformity, dissimilarity, inappropriateness or poor quality of design in the exterior appearance of structures and the lack of proper attention to site development and landscaping in the: industrial and airport operations zone

districts hinders the harmonious development of the County, impairs the desirability of residence, investment or occupation in the County, limits the opportunity to attain the optimum use and value of land and improvements, adversely affects the stability and value of property, produces degeneration of property in such areas with attendance deterioration of conditions affecting the health, safety and welfare of the County, and destroys a proper relationship between the taxable value of property and the cost of services thereof.

Further, the County finds that riparian vegetation is a resource which has been identified in the Comprehensive Plan.

SECTION 5.6.300. Jurisdiction.

1. Within any zone designation requiring a site plan review, no building permit or verification letter shall be issued for the erection or construction of a permitted or conditional use until the plans, drawings, sketches and other documents required under Section 5.6.500 have been approved by the Planning Director in conformity with the criteria specified in Section 5.6.400 (Criteria and Standards). For the purpose of this Section "Construction" shall include any remodeling that substantially changes the exterior appearance of the building.

2. Construction, site development and landscaping shall be carried out in substantial accord with the plans, drawings, sketches and other documents as approved.

3. Nothing in this subsection shall be construed to prevent ordinary repair, maintenance and replacement of any part of the building or landscaping which does not involve a substantial change from the purpose and objectives of Section

5.6.100. Proposed "substantial changes" shall be submitted to the Planning Director for approval.

4. All variances from the site development criteria which are deemed necessary by the applicant shall be requested pursuant to ARTICLE 5.3.

SECTION 5.6.400. Site Development Criteria and Standards. These standards are intended to provide a frame of reference for the applicant to the development of a site and building plans as well as a method of review. These standards shall not be regarded as inflexible requirements, nor do they advocate any particular architectural style, for they are intended to encourage creativity, invention and innovation. The following standards shall be utilized in reviewing the plans, drawings, sketches and other documents required under Section 5.6.500:

1. Landscaping.

   a. The landscape shall be such to minimize soil erosion and lessen the visual impact;

   b. any grade changes shall be in keeping with the general appearance of neighboring developed areas.

2. Structures.

   a. Proposed structures shall be related harmoniously to the terrain and to existing buildings in the vicinity that have a visual relationship to the proposed buildings;

   b. the achievement of such relationship may include the enclosure of space in conjunction with other existing buildings or other proposed buildings and the creation of focal points with respect to avenues of approach, terrain features or other buildings.

3. Drives, Parking and Circulation. With respect to vehicular and pedestrian circulation, including walkways, interior drives and parking, special attention shall be given to the location and number of access points, general interior circulation, separation of pedestrian and vehicular traffic, and arrangement of parking areas that are safe and convenient.

4. Surface Water Drainage. Special attention shall be given to proper site surface drainage so that removal of surface waters will not adversely affect neighboring properties, the public storm drainage system, or create environmental problems.

5. Utility Service.

   a. Whenever feasible, electric, telephone and other utility lines shall be underground;

b. any utility installations remaining above ground shall be located so as to have an harmonious relation to neighboring properties and the site;

c. the proposed method of sanitary sewage disposal from all buildings shall be indicated.

6. Special Features.

a. Exposed storage areas, exposed machinery installations, service areas, truck loading areas, utility buildings and structures and similar accessory areas and structures shall be subject to such setbacks, screen plantings or other screening methods as shall be reasonably required to prevent their being incompatible with the existing or contemplated environment and the surrounding properties;

b. service, processing, and storage on property abutting a residential zone or commercial zone shall be wholly within an enclosed building or screened from view from such zone, street or highway by a permanently maintained, sight obscuring device or vegetation.

7. Application of Design Standards. The standards of review outlined in (1) to (6) above also apply to all accessory buildings, structures, exterior signs and other site features however related to the major buildings or structures.

8. Riparian Vegetation Protection:

a. Riparian vegetation within 50 feet of a estuarine wetland, stream, lake or river, as identified on the Coastal Shoreland and Fish and Wildlife habitat inventory maps, shall be maintained except that:

1) Trees certified by the Coos Soil and Water Conservation District, a port district or U.S. Soil Conservation Service posing an erosion or safety hazard may be removed to minimize said hazard; or

2) Riparian vegetation may be removed to provide direct access for a water-dependent use; or

3) Riparian vegetation may be removed in order to allow establishment of authorized structural shoreline stabilization measures; or

4) Riparian vegetation may be removed to facilitate stream or streambank clearance projects under a port district, ODFW, BLM, Soil & Water Conservation District, or USFS stream enhancement plan; or

5) Riparian vegetation may be removed in order to site or properly maintain public utilities and road right-of-ways, provided that the vegetation to be removed is the minimum necessary to accomplish the purpose; or

6) Riparian vegetation may be removed in conjunction with existing agricultural operations (e.g., to site or maintain irrigation pumps, to limit encroaching brush, to allow harvesting farm crops customarily grown

within riparian corridors, etc.) provided that such vegetation removal does not encroach further into the vegetation buffer except as needed to provide an access to the water for the minimum amount necessary to site or maintain irrigation pumps.

b. The 50 ' riparian vegetation setback shall not apply in any instance where an existing structure was lawfully established and an addition or alteration to said structure is to be sited not closer to the estuarine wetland, stream, lake, or river than the existing structure and said addition or alteration represents not more than 100% of the size of the existing structure's "footprint." [OR 92-05-009PL]

SECTION 5.6.500. Application Submittal and Review Procedure.

1. Submission of Documents. A prospective applicant for a building or other permit who is subject to site design review shall submit the following to the County Planning Director:

a. A site plan, drawn to scale, showing the proposed layout of all structures and other improvements including but not limited to, where appropriate, driveways, pedestrian walks, landscaped areas, fences, walls, offstreet parking and loading areas, and railroad tracks. The site plan shall indicate the location of entrances and exits and the direction of traffic flow into and out of offstreet parking and loading areas, the location of each parking space and each loading berth and areas of turning and maneuvering vehicles. The site plan shall indicate how utility service and drainage are to be provided.

b. A landscape plan, drawn to scale, showing the location of existing trees proposed to be retained on the site, the location and design of landscaped areas, the varieties and sizes of trees and plant materials to be planted on the site, other pertinent landscape features, and irrigation systems required to maintain trees and plant materials.

c. Architectural drawings or sketches, drawn to scale, including floor plans, in sufficient detail to permit computation of yard requirements and showing all elevations of the proposed structures and other improvements as they will appear on completion of construction.

d. Specifications as to type, color and texture of exterior surfaces of proposed structures including reflective surfaces of solar collectors.

e. A site plan drawn to scale, showing the location, size, design, material, color and methods of illumination of all exterior signs.

f. An application request which shall include:

i. name and address of applicant;

ii. statement of applicant's legal interest in the property (owner, contract purchaser, lessee, renter, etc.) and a description of that interest, and in cast the applicant is not the owner, verification of the owner's consent.

iii. address and legal description of the property;

iv. statement explaining the intended request;

v. the required fee pursuant to SECTION 1.3.900;

vi. any other materials or information as may be deemed necessary to assist in evaluation of the request.

2. Action by Planning Director. The Planning Director, or his designee, shall review all drawings, plans and specifications submitted for design review. If he finds that they meet all other requirements of the Ordinances of the County, he shall approve or condition the site plan. If the Planning Director disapproves, the proposal may be submitted to the Board of County Commissioners for their review. Reasonable conditions may be established by the Planning Director or Board of Commissioners in connection with a Site Review Permit as deemed necessary to secure the purpose and requirements of this Article. Guarantees and evidence may be required that such conditions will be or are being complied with.

3. Threshold Standard. The Planning Director, at his discretion, may waive part or all of the site plan requirements including fees, if, in the Director's judgement, the proposed development is diminimous in extent to the existing development.

4. Notice of Decision. Within five (5) working days of making the decision, the Planning Director shall cause a notice to be prepared and distributed announcing the decision pursuant to Section 5.7.100; and

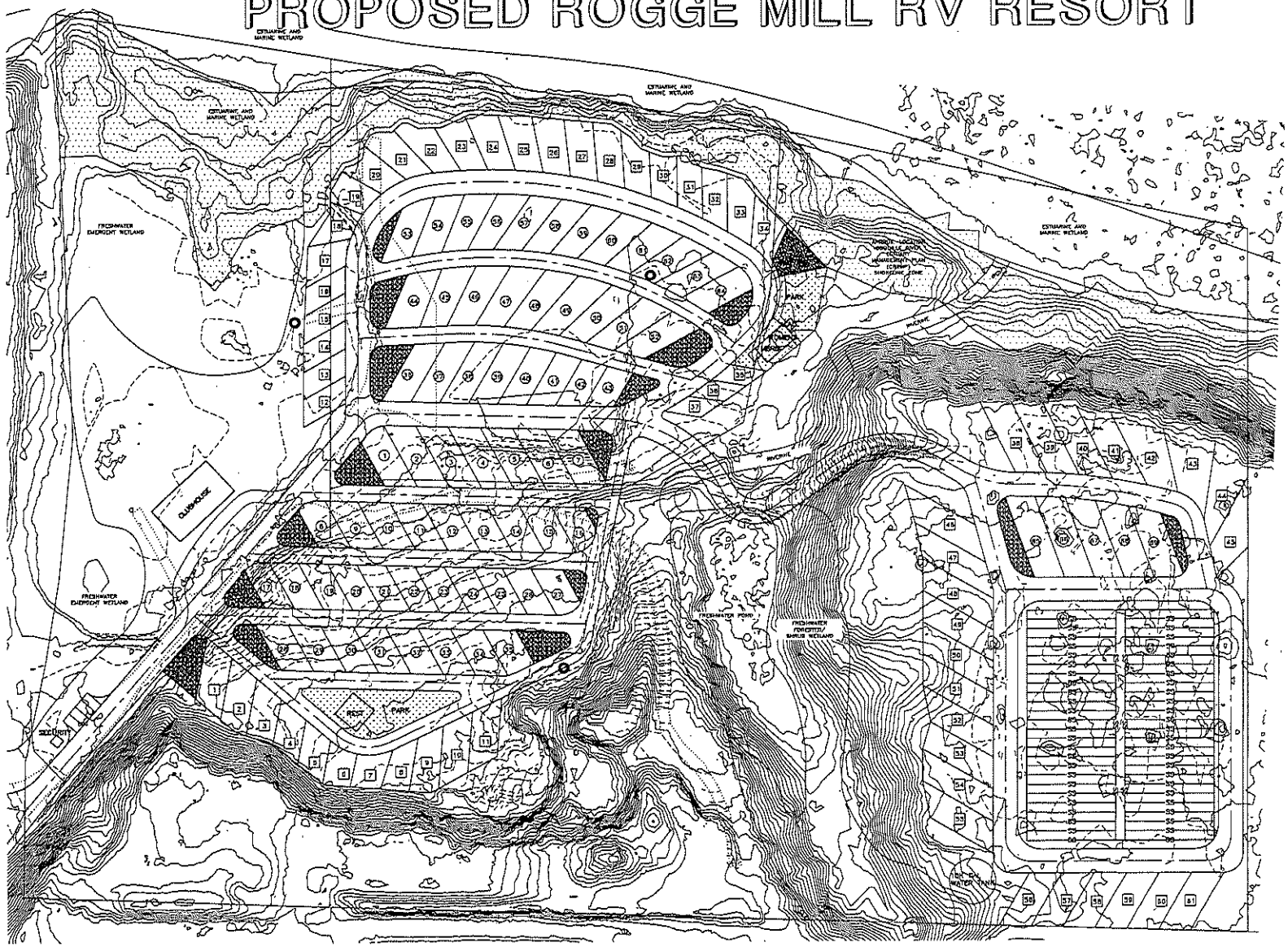
a. mail the notice to the applicant, affected cities, special districts, Hearings Body members and other parties requesting such notification; and

b. post the notice at a conspicuous location in the Planning Department office and the Coos County Courthouse.

5. Appeals. Any appeal of a Planning director's decision shall be made pursuant to Article 5.8.

SITE PLAN EXHIBIT

PROPOSED ROGGE MILL RV RESORT



TOTAL SPACES: 130
61 BACK IN SPACES
69 PULL THRU SPACES

LOWER AREA:
37 BACK IN SPACES
64 PULL-THRU SPACES

UPPER AREA:
24 BACK IN SPACES
5 PULL-THRU SPACES

N

0' 75' 150' 300'
SCALE: 1" = 30'

PROJECT NO. 3142-01
DWG BY: AW

DEQ CNFAD AND RELATED MATERIAL

Summary Information

This property is the location of historic wood product mill operations. soil, groundwater and estuarine sediments have been contaminated with relatively low concentrations of petroleum, pentachlorophenol and dioxin. Future use of the site is likely to include redevelopment as an RV park. Risk assessment has demonstrated no unacceptable human health or ecological risk is present with the conditions described in the staff memo, EES, CMMP and NFA for the property.

General Site Information

Site:	**Rogge Planer Facility (North) (ECSI Site ID: 6048)**	**CERCLIS (EPA) Id**	
Project Manager:	**N/A - Project Completed.**	**Investigative Status:**	**Contamination Suspected**
PM Phone:		**NPL(National Priority Listing):**	**No**
Address:	**McKee Gulch Rd. (S bank Coquille R. at E side of Hwy 101 Bridge) Bandon, 97411**	**Is this site an Orphan?**	**No**
		Is this site a brownfield?	**No**
County:	**COOS**	**Action Underway or Needed:**	**No Further Action (Conditional)**
Region:	**Western Region**	**Click for more details**	

NOTE: This site has one or more long-term controls designed to manage site risks. Click here for details.

Site Documents

Click the link to view the document.

File Name	Category	File Size MB	Document Date	Upload Date
RoggePlanerMill EES.pdf	E&ES documents	3.3390	3/13/2018	3/15/2018
6048RevisedDraftRoggeRiskEvaluation 9-15-17.pdf	Eco/HH Risk Assessments	2.3827	9/26/2017	10/3/2017
EcoReportJune2016.pdf	Eco/HH Risk Assessments	1.2109	6/27/2016	12/20/2017
Final Rogge Planar Staff Memo.pdf	Memos	1.3835	2/26/2018	3/15/2018
DataJune2016.pdf	Miscellaneous	0.4663	6/27/2016	7/20/2016
6048 Rogge CMMP 3-5-2018.pdf	Miscellaneous	2.3966	3/5/2018	3/7/2018
RoggeMillNorthPropertyPhase2August2015.pdf	Reports	3.5398	8/15/2015	11/13/2015
SamplingReportMay2016.pdf	Reports	3.6074	5/19/2016	5/19/2016
Sep2016EcoReportData.pdf	Reports	0.4667	9/26/2016	10/12/2016
Sep2016EcoReportRogge.pdf	Reports	3.5921	9/26/2016	10/12/2016
Phase1February2000.pdf	Reports	3.3437	2/10/2000	12/20/2017
Phase1March2015.pdf	Reports	2.6507	3/25/2015	12/20/2017
Risk Addendum 1-25-18.pdf	Reports	1.8589	1/26/2018	3/2/2018
ECSI 6048NFA RoggePlanerMill.pdf	Signed NFA letters	0.2514	3/22/2018	3/23/2018

Click on the Photograph to see a larger version.

site view looking northeast toward Coquille River, March 2017

site view looking west, concrete retaining wall in center, former truck shop/dock area and sediment sample area B on the right, March 2017

former truck shop, dock and sediment

former truck shop sediment area with what appeared to

sediment sample A location, former truck

site view looking east, former truck shop area on the left, March 2017

1950's Aerial view of th Rogge Mill site along sout bank of Coquille River jus north of Highway 10 bridge

This website application cannot be made compliant with the Americans with Disabilities Act. We apologize for any inconvenience and invite you to contact DEQ at 800-452-4011 or email deqinfo@deq.state.or.us for assistance in accessing this site

Department of Environmental Quality
700 NE Multnomah Street, Suite 600 Portland, OR 97232
Hours: Mon-Fri, 8 a.m.-5 p.m

Email: DEQInfo@deq.state.or.us | Phone: 503-229-5696 | Fax: 503-229-6124

Oregon
Kate Brown, Governor

Department of Environmental Quality
Western Region Eugene Office
165 East 7th Avenue, Suite 100
Eugene, OR 97401
(541) 686-7838
FAX (541) 686-7551
TTY 711

March 20, 2018

Edward & Judith Eckes
JGE Properties, LLC
10325 Desert Forest Circle
Sun City, AZ 85351

RE: Conditional No Further Action Determination
for Rogge Planer Facility (North)
ECSI #6048

Dear Mr. & Mrs. Eckes:

The Oregon Department of Environmental Quality (DEQ) has completed a review of the available information and the closure report entitled "Risk Screening Evaluation report", dated November 9, 2017 and submitted to DEQ on your behalf. The former Rogge Planer Facility (North) property includes three tax lots (01000, 01001 & 01002) combined for a total of approximately 25 acres and has no assigned address. The property is located along the south bank of the Coquille River immediately North of the Highway 101 Bridge at McKee Gulch Road and Highway 101.

DEQ has determined that remedial action to address environmental contamination at Rogge Planer Mill (North) is complete, and no further action is required with conditions described in the attached Easement and Equitable Servitudes. This determination is based on the DEQ regulations and the facts as we now understand them including, but not limited to the following:

- The site was developed in the 1940's as a lumber and plywood mill and operated as such until the 1990's when mill operations were abandoned and the property was vacated.
- Mill operations at the site varied over the years and included vehicle service shop work, lumber milling and plywood manufacturing. These operations and wood waste burning produced petroleum, metals, chlorinated hydrocarbon and dioxin contaminants in upland soil, groundwater and estuarine sediments of the Coquille River.
- Environmental investigation and contaminant remediation began at the property with an initial sampling of contaminated media in May 2015. Additional site assessment sampling events occurred between March 2016 and March 2017. Soil, groundwater and sediment samples have been collected in order to determine the magnitude and extent of contamination in each of these media.
- Soil, groundwater and sediment contamination remains in place at the site. Site assessment sampling results and a risk assessment indicate remaining contaminant levels do not pose an unacceptable risk to future uses of the property or ecological receptors in the estuary as long as the conditions detailed in the attached easement and equitable servitudes are followed.

- Future uses of the property are likely to include commercial and/or recreational development with residential use allowed by conditional approval from Coos County. Municipal water is not supplied to the property and thus, development of groundwater (wells) for consumptive use at the property is likely. Any future groundwater use must comply with the conditions in section 3 of the attached easement and equitable servitudes document.
- An institutional control consisting of an easement and equitable servitudes has been recorded for the property (attached) that requires future development to include proper management of contaminated soil and restriction of installation and use of water wells within the area of remaining contamination.
- A public notice for this project closure was completed on March 5, 2018. No comments or concerns have been received.

Based on the available information, the Rogge Planer Facility (North) site is currently protective of public health and the environment. The site requires no further action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq. unless new or previously undisclosed information becomes available, or there are changes in site development or land and water uses, or more contamination is discovered. DEQ has updated the Environmental Cleanup Site Information System (ECSI) database to reflect this decision.

This letter only applies to the release discussed above. If any contaminated soil or groundwater is encountered in the future, it must be handled and disposed of in accordance with the site Contaminated Media Management Plan and local, state and federal regulations.

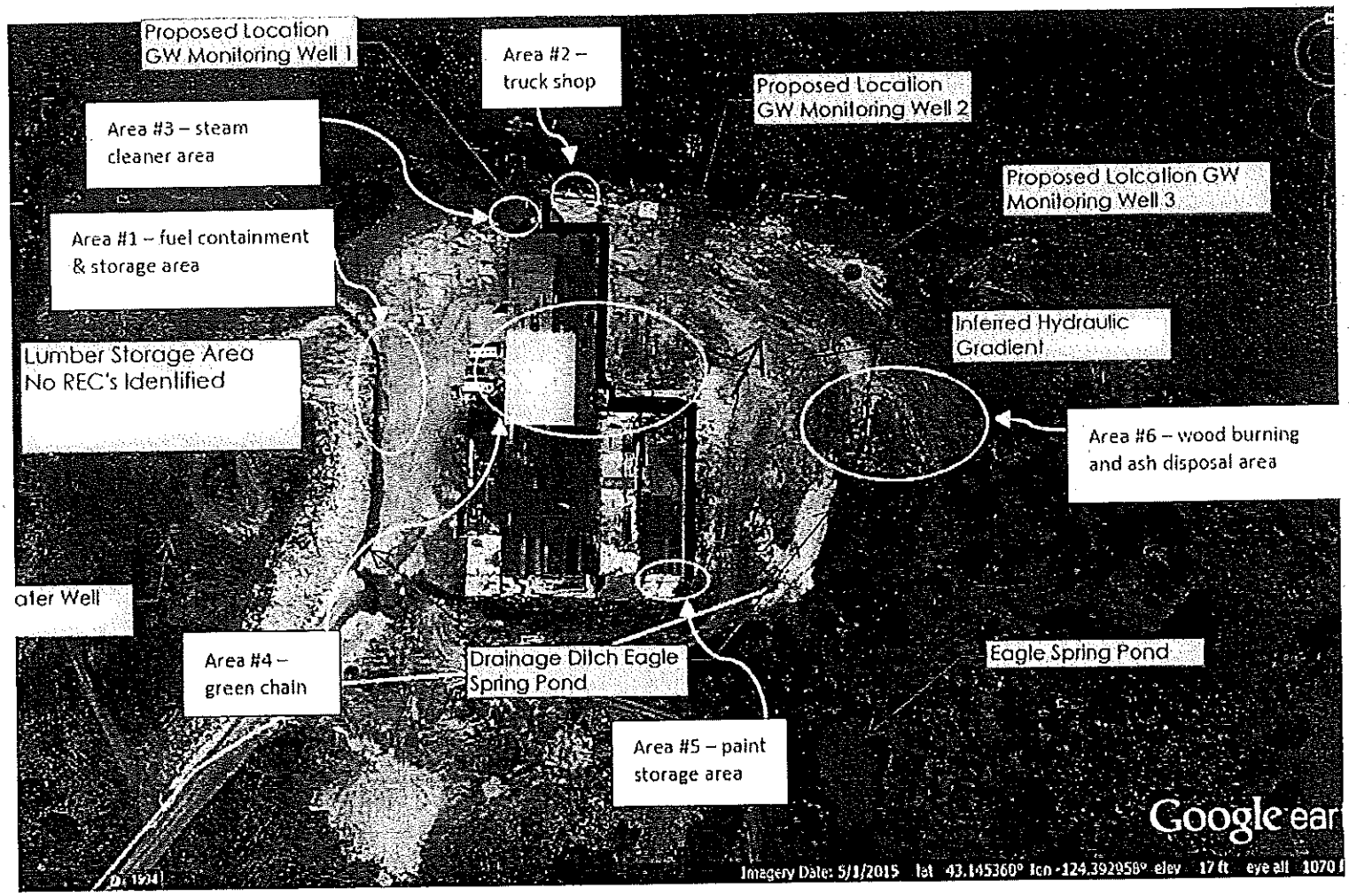
A copy of the staff memo supporting this No Further Action decision can be viewed at http://www.deq.state.or.us/Webdocs/Forms/Output/FPController.ashx?SourceIdType=11&SourceId=6048&Screen=Load. DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records. If you have any questions, please contact Eric Clough at 541-269-2721 x231, or via email at clough.eric@deq.state.or.us

Sincerely,

Donald E. Hanson, Acting Manager
Western Region Cleanup & Emergency Response Section

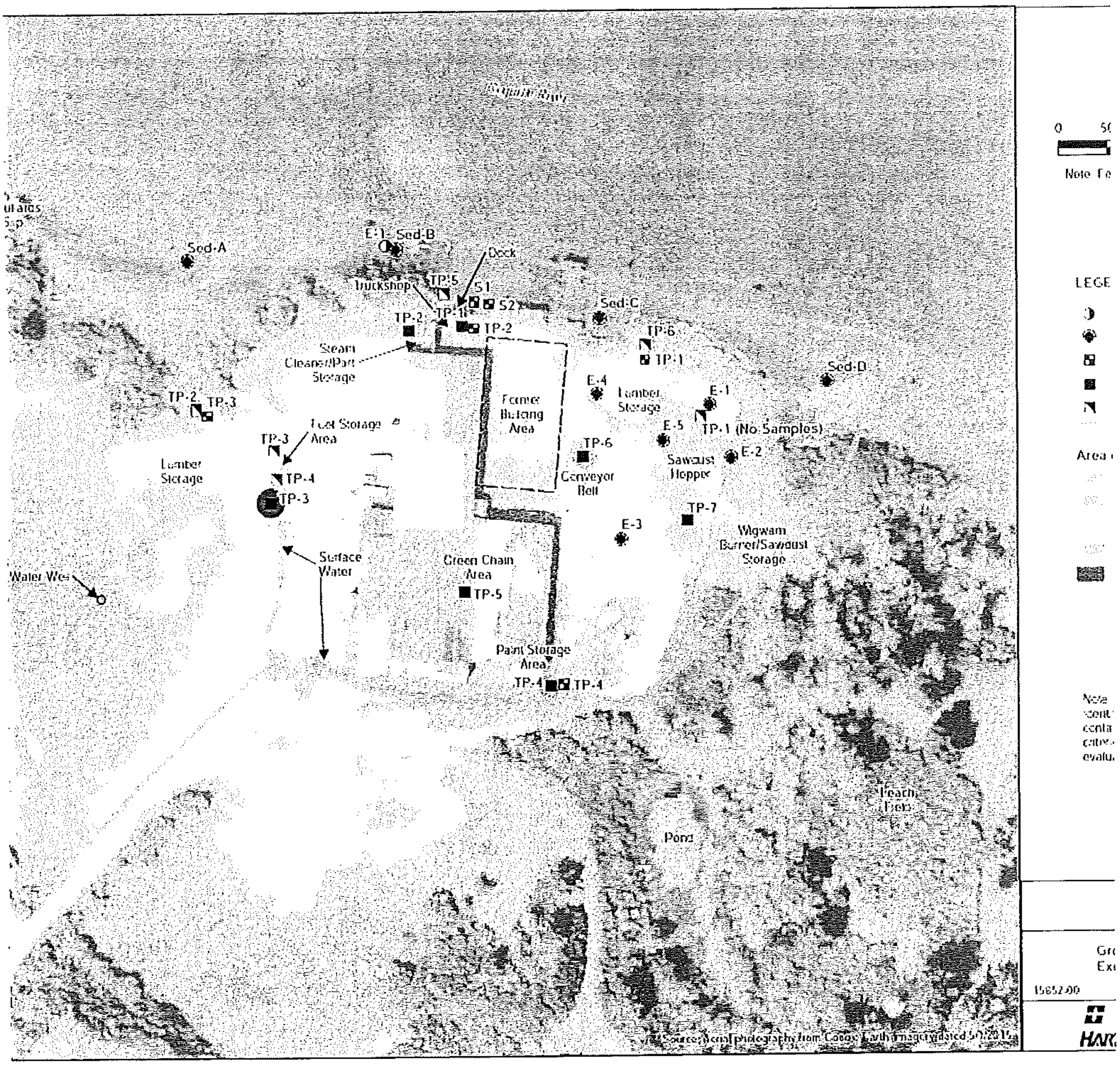
Attachment(s): Contaminated Media Management Plan
Easement and Equitable Servitudes

cc: Don Hanson (elec) – DEQ, EUG
Susan Turnblom (elec) – DEQ, EUG
Norm Read (elec) – DEQ, EUG
Rick Ernst – HartCrowser
6420 Macadam Avenue, Suite 100
Portland, OR 97239-3517
ECSI #6048 File

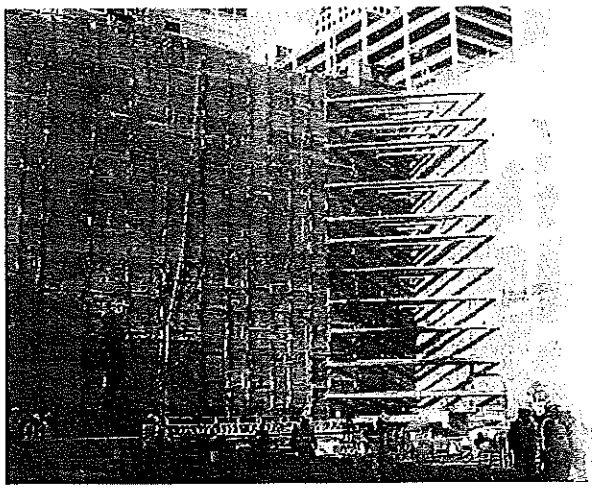


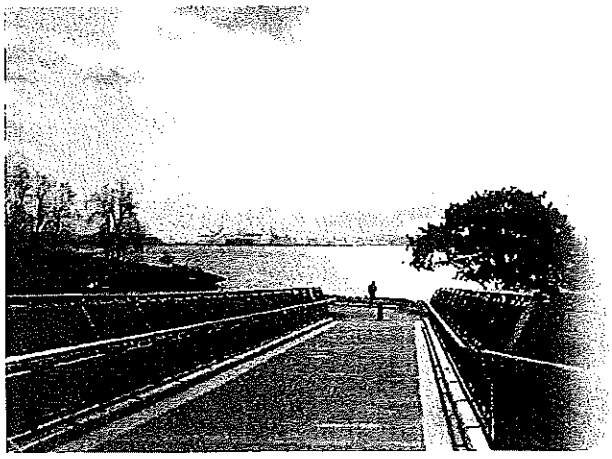
N

	Project No: 15031	SITE RECONNASIANCE MAP Rogge Property Highway 101 Bandon, Oregon	Fig
	Date: Jan., 2016		



Sed-A
E-1
Sed-B
Dock
TP-5
Truckshop
S1
S2
TP-1
TP-2
TP-2
Sed-C
TP-6
TP-1
Steam Cleaner/Part Storage
Sed-D
E-4
Lumber Storage
E-1
Former Burning Area
TP-2
TP-3
Fuel Storage Area
TP-3
E-5
TP-1 (No Samples)
Lumber Storage
TP-6
E-2
TP-4
Sawdust Hopper
Conveyor Belt
TP-3
TP-7
E-3
Wigwam Burner/Sawdust Storage
Surface Water
Green Chain Area
Water Well
TP-5
Paint Storage Area
TP-4
TP-4
Pond





Contaminated Media Management Plan

Former Rogge Planer Mill

Highway 101
Bandon, Oregon

ECSI No. 6048

Prepared for
JGE Properties, LLC

March 5, 2018
15852-01

HARTCROWSER

HARTCROWSER

www.hartcrowser.com

Contaminated Media Management Plan

Former Rogge Planer Mill

Highway 101
Bandon, Oregon

ECSI No. 6048

Prepared for
JGE Properties, LLC

March 5, 2018
15852-01

Prepared by
Hart Crowser, Inc.

Christopher W. Martin, PE
Sr. Project Engineer

Richard D. Ernst, RG
Principal Geologist

6420 SW Macadam Avenue, Suite 100
Portland, OR 97239-3517
Tel 503.620.7284

Contents

1.0 INTRODUCTION 1
1.1 Purpose 1
1.2 Plan Organization 1
1.3 Limitations 2

2.0 BACKGROUND 2
2.1 Site Location and Description 2
2.2 Geology and Hydrogeology 3
2.3 Previous Environmental Activities 3

3.0 WORKER SAFETY 5

4.0 CONTAMINATED MEDIA IDENTIFICATION AND MANAGEMENT 6
4.1 Regulatory Requirements, Screening Levels, and Criteria 6
4.2 Identification of Potentially Contaminated Soil and Groundwater 7
4.3 Handling of Contaminated Media 8
4.4 Analytical Protocols for Media Characterization 10
4.5 Erosion Control 10
4.6 Disposal Options 11
4.7 Permits and Approvals 11

5.0 ADDITIONAL CONSIDERATIONS FOR CONSTRUCTION PROJECTS 11

6.0 REFERENCES 12

TABLES

1 Soil Chemical Analyses Results: TPH
2 Soil Chemical Analyses Results: SVOCs
3 Soil Chemical Analyses Results: VOCs
4 Soil Chemical Analyses Results: Dioxins/Furans
5 Groundwater Chemical Analyses Results: TPH
6 Groundwater Chemical Analyses Results: SVOCs
7 Groundwater Chemical Analyses Results: VOCs
8 Groundwater Chemical Analyses Results: Total Metals
9 Groundwater Chemical Analyses Results: Dioxins/Furans

FIGURES

1 Vicinity Map
2 Test Pit and Sample Locations

APPENDIX A

No Longer Contained-In Determination Directive

APPENDIX B

No Longer Contained-In Determination Example

Contaminated Media Management Plan

Former Rogge Planer Mill

Highway 101

Bandon, Oregon

1.0 INTRODUCTION

This Contaminated Media Management Plan (CMMP) presents the protocols for identifying and managing contaminated soil and groundwater during any future earthwork-related construction activities at the former Rogge Planer Mill (Environmental Cleanup Site Information (ECSI) No. 6048) site in Bandon, Oregon (Figure 1). This plan includes information on identification, response to, removal, temporary storage, transportation, and disposal of contaminated soil and groundwater. Health and safety issues are also described.

1.1 Purpose

The purpose of this CMMP is to provide site-specific information and guidance for contractors to identify and appropriately manage contaminated media during future earthwork-related activities at the former Rogge Planer Mill site. The procedures described in this CMMP are limited to the upland portion of the Locality of the Facility (LOF; Figure 2) and does not include aboveground demolition, in-water/river bank work or work in other areas of the property. Based on previous environmental studies, earthwork activities may encounter generally low concentrations of total petroleum hydrocarbons (TPH); semivolatile organic compounds (SVOCs) including polycyclic aromatic hydrocarbons (PAHs) and pentachlorophenol (PCP); volatile organic compounds (VOCs); and dioxins/furans in soil and groundwater within the upland LOF. Metals results appear to be similar to natural background concentrations. Besides this CMMP, any redevelopment activities are subject to best management practices (BMPs) prescribed by permits, plans, and specifications; and adherence to regulation and requirements of local, state, and federal agencies.

1.2 Plan Organization

Subsequent sections of this CMMP are organized as follows:

- Section 2 provides a description of the project site; a summary of previous environmental investigations; and a description of the nature and extent of contamination at the site.
- Section 3 presents a discussion of health and safety.
- Section 4 describes procedures for the identification and management of contaminated media.
- Section 5 presents additional considerations for construction on or adjacent to the site.
- Section 6 provides references.

Tables 1 through 9 provide a summary of soil and groundwater data for the site. Figures show the site vicinity and site exploration and sample locations. Appendix A provides Oregon Department of Environmental Quality's (DEQ's) directive on No Longer Contained-In (NLCI) Determinations, and Appendix B presents an example from the site to dispose of soil.

1.3 Limitations

This CMMP is intended only to provide procedures for identifying and handling of contaminated media encountered during earthwork and ground-disturbing maintenance activities on the upland portion of the LOF (Figure 2). This CMMP does not cover in-water activities or earthwork and ground-disturbing maintenance activities in other areas of the property. Hart Crowser prepared this CMMP in accordance with generally accepted professional practices related to the nature of the work specified in the CMMP, in the same or similar localities, at the time this plan was prepared. Future users of this plan shall consider changes that may have occurred in environmental practices, regulations, and guidance, including risk-based and clean fill criteria since plan preparation. No other warranty, express or implied, is made.

2.0 BACKGROUND

This section presents a brief description of the site and results of previous environmental activities. Documentation of previous environmental activities associated with the site were provided by JGE Properties, LLC, their local environmental consultant (Cascadia Geoservices, Inc., of Port Orford, Oregon), the DEQ's Environmental Cleanup Site Information (ECSI) database for ECSI No. 6048 (DEQ 2018), and Hart Crowser's Risk Screening Evaluation Report and Addendum (Hart Crowser 2017, 2018). References are provided in Section 6.

2.1 Site Location and Description

The site is the former Rogge Planer Mill located on the east side of Oregon State Highway 101 north of Bandon, Oregon, and along the south bank of the Coquille River (Figures 1 and 2). The site is located on a property composed of three adjoining tax lots (1000, 1001, and 1002) that cover a total of 25.6 acres. These tax lots are situated in Section 17 of Township 28 South, Range 14 West, Willamette Meridian. Besides the river to the north and highway to the west, adjoining properties to the south and east consist of undeveloped land and cranberry bogs with occasional rural, single family residences.

Based on Phase I ESAs for the property (Baker Environmental 2000, Cascadia Geoservices 2015a), the site was likely developed in 1952 and was used as a veneer and plywood mill until 1978, whereupon it was used as a planer mill through 1995. From 1996 through 2000, the site building was used for manufacturing wood products. From 2000 to 2014, it was used a cedar re-saw mill. Currently the site is vacant. Another historical use of the property included a ferry slip on the westernmost portion of the site prior to 1954. The Bullards Ferry operated a ferry across the Coquille River until completion of the Highway 101 bridge (the Bullards Bridge) in 1954.

While in operation, the mill had one large building (approximately 52,000 square feet) that also included an office and truck shop. A dock was present along the Coquille River. Lumber storage areas

were primarily west and south of the mill building. Historically, a wigwam burner was present east of the mill, but was replaced in the late 1960s with a sawdust hopper (by 1980, the burner no longer appears on aerial photographs). Both the burner and hopper were fed by a conveyor.

A man-made, fire suppression pond is southeast of the former mill building and is fed by Eagle Springs. The previous water source for the mill facility was a large "dug well" installed in the spring area of the site (southeast of the facility) and is located west of the fire suppression pond (Baker Environmental 2000). In 1971, a 40-foot-deep water well was drilled; however, the water did not clear up and the well was abandoned (Oregon Water Resources Department [OWRD] 2017). In 2007, a 67-foot-deep water well was installed approximately 250 feet west of the mill building on the site (Figure 2; OWRD 2017). The well is screened between 62 and 67 feet below ground surface (bgs) with a bentonite seal from the ground surface to 43 feet bgs. It currently does not have a pump or associated plumbing.

2.2 Geology and Hydrogeology

The mill site is situated at an elevation of 16 to 18 feet above mean sea level (msl). The ground surface slopes gently to the north towards the Coquille River. To the south and east are low-lying hills that reach a maximum elevation of approximately 85 feet msl. Eagle Springs, a perennial spring, surfaces in the hills southeast of the former mill building and feeds the pond on the site. Overflow from the pond drains into ditches that wrap around the east and west sides of the former mill building.

Based on previous environmental reports and well log searches, the geology at the mill site generally consists of up to 4 feet of surficial soil fill (gravel, sand, and silt, sometimes with wood debris) over alluvial mixtures of sands, gravels, and silts. Claystone was encountered at depths of 58 and 67 feet bgs. The depth to shallow groundwater is variable – it has generally been encountered at 4 to 6 feet bgs during the spring and as deep as 10 feet bgs in the summer. In some instances, it has been encountered as shallow as 2 feet bgs or not at all and even as deep as 11 feet bgs. The direction of groundwater flow is expected to be to the north towards the Coquille River.

2.3 Previous Environmental Activities

Two Phase I ESAs have been conducted for the site property: Baker Environmental of Yreka, California, in 2000 (site visit in November 1999), and Cascadia Geoservices in 2015. Collectively, these Phase I ESAs identified the following Recognized Environmental Conditions (RECs) for the site property.

- An aboveground fuel storage containment area was previously located west of the mill building. Historically an 8,000-gallon diesel tank and a 1,000-gallon gasoline tank were present in this area. During the 2000 Phase I ESA, a 550-gallon waste oil tank (for used motor oil) was present. By 2015, the tank was gone. Soil staining was observed in the area during both Phase I ESAs.
- A former truck shop was located at the north end of the mill building, and staining was observed in 1999 on the walls and floors. Additionally, automotive and equipment batteries were stored on the floor of the former truck shop. The truck shop has since been removed.

- In 1999, staining was observed on wood floors in the former steam cleaning room at the north end of the mill building. An empty aboveground storage tank (AST), the fuel source for the steam cleaner, was near this room. The room and AST have since been removed.
- In 1999, several 55-gallon metal drums and other containers with waste motor oil were stored at various locations on the property, and drums with gasoline and diesel were present within the mill building. A pallet of "caustic soda" bags was located in the mill building. All these liquids and materials have since been removed from the site.
- A paint storage area was present within the southeast corner of the mill building. In 1999, large containers of paint products (i.e., 30- to 55-gallon metal drums). Paint was reportedly used to seal ends of milled wood products from the prior planer operations. These containers were no longer present in 2015.
- A square electrical transformer was present on the east wall of the mill building and, during an inspection by the U.S. Environmental Protection Agency (EPA), was suspected as containing polychlorinated biphenyls (PCBs). It was later determined that the transformer was actually a plate transformer which did not have any insulating oil.

Three environmental investigations were conducted in May 2015, March 2016, and July 2016 to assess for chemical contamination at the site (Cascadia Geoservices 2015b, 2016a,b). Based on the above RECs and field observations, test pits were completed to obtain soil and groundwater samples for analysis from seven primary areas of concern. These areas and the test pits performed to assess them are listed below and shown on Figure 2 (test pits were similarly named during each investigation; symbols are used on Figure 2 to distinguish the various phases of investigation). Soil, sediment, and groundwater samples were analyzed for TPH, SVOCs, VOCs, dioxins/furans, and metals.

- Fuel Storage Area: TP-3 and TP-4 in May 2015, and TP-3 in March 2015.
- Truck shop: TP-1 in March 2016.
- Steam Cleaning/Parts Storage Room: TP-2 in March 2016.
- Green Chain: TP-5 in March 2016 (this was added due to machinery and paint use).
- Paint Storage Area: TP-4 in March 2016, and TP-4 in July 2016.
- East Area (Sawdust Hopper and Burner): TP-6 and TP-7 in March 2016.
- Riverbank: TP-1, TP-2, TP-5, and TP-6 in May 2015, and TP-6, TP-7, S1, and S2 in July 2016.

In the paint storage area, the follow-up test pit in July 2016 was actually a 20-foot-wide by 40-foot-long excavation that was 1 to 2 feet deep (Figure 2). Soil from the excavation was stockpiled on the site. The NLCI Determination included in Appendix B was prepared for disposal of this soil. For the riverbank test pits, these were completed to assess sediment quality adjacent to the site and groundwater quality at the downgradient edge of the site property before its emergence at the river.

In early 2017, Hart Crowser completed a draft Risk Screening Evaluation Report that compiled available site information and chemical data from these previous investigations, prepared a conceptual site model, and screened data against risk-based screening levels. Upon review, the DEQ requested additional dioxin/furan data on upland soil and sediments to better assess risks to human and ecological receptors. Sediment samples Sed-A through Sed-D were obtained from the uppermost foot of riverbank sediment, and a 5-point composite was obtained from the upper foot of soil in the east portion of the site. All available data were then re-evaluated in the final Risk Screening Evaluation Report (Hart Crowser 2017) which indicated the site is unlikely to pose an unacceptable risk. An addendum was later prepared that refined the risk screening for recreational use at the site (Hart Crowser 2018).

Chemical data collected from within the upland LOF from previous environmental investigations are presented in Tables 1 through 9. These data indicate that contamination from past mill operations is overall relatively low, with a few localized areas of moderate contamination (i.e., fuel and paint storage areas). For data collected from the in-water portion of the LOF, refer to the Risk Screening Evaluation Report (Hart Crowser 2017).

3.0 WORKER SAFETY

Because contamination is present at the site and could result in contaminant exposure to workers, each entity involved in earthwork-related activities is responsible for the safety of their workers. Prior to beginning site activities within the upland LOF, each entity shall prepare a site-specific Health and Safety Plan (HASP) in accordance with Oregon Occupational Safety and Health Administration (OSHA) to cover safety issues related to site environmental and physical hazards and to describe any training requirements, monitoring, and certifications. The HASP shall include the potential exposure to contaminated soil and groundwater, including possible VOCs emanating from these media.

As part of the HASP preparation, each involved entity shall make an assessment of existing data and the location of the planned work to identify potentially contaminated media as it relates to worker safety. Occupational health guidelines for chemical hazards (i.e., OSHA and the National Institute for Occupational Safety and Health [NIOSH]) can be used to evaluate site conditions. The evaluation should consider exposure limits (i.e., time-weighted average, short term exposure limit, permissible exposure limit), exposure symptoms, and personal protection equipment. Testing, management, handling, excavation, and transportation of contaminated media may require persons with 40-hour Hazardous Waste Operation & Emergency Response (29 Code of Federal Regulations [CFR] 1910.120) training. Each party involved should assess the need for this training on the basis of current information for the site. Specific recommendations should be provided in the HASP to protect worker safety.

All entities shall be responsible for notifying and updating their employees of potential site hazards that may be encountered during the project. Changes may need to be made should additional contamination be discovered. Prior to site work, this CMMP and the HASP must also be provided to employees who will be working on the site, and a list of contacts should be prepared and distributed to all entities involved in work at the site for implementation of this CMMP. This will help ensure timely notification of changing site conditions to maintain the appropriate level of worker safety. Prior

to any ground-disturbing activities, a utility locate should be performed to identify potential utilities in proposed work areas. All site workers will be responsible for compliance with their HASP, including use of appropriate personal protection equipment.

4.0 CONTAMINATED MEDIA IDENTIFICATION AND MANAGEMENT

Environmental investigations have identified relatively low concentrations of TPH; SVOCs, including PAHs and PCP; VOCs; and dioxins/furans in soil and groundwater. Metals results appear to be similar to natural background concentrations. Prior to any earthwork-related activities within the upland LOF, site workers and their employers should review this CMMP. Soil and groundwater from within the upland LOF should be considered contaminated unless testing indicates otherwise. This section presents regulatory requirements; methods to identify and manage contaminated soil and groundwater; as well as an analytical program to identify uncontaminated media.

4.1 Regulatory Requirements, Screening Levels, and Criteria

Certain regulatory requirements, screening levels (SLs), and criteria are applicable for managing soil and groundwater from the site. Future users of this document should review regulatory requirements for updates and revisions. The regulatory factors described below are applicable as of March 2018. While these requirements are primarily applicable during excavation or construction, they also will apply for contaminated media exposed or generated during future site maintenance. These items are described below as they pertain to this site. Additional criteria may be used by disposal facilities to determine whether to accept environmental media from the site for treatment and/or disposal.

Hazardous Waste Regulations. PCP identified within the upland LOF may be the result of a past wood treating process and wastes with PCP are considered an F-listed hazardous waste (code F032). PCP released to soil or groundwater results in the soil and groundwater also being a hazardous waste (F032), requiring management and disposal as a hazardous waste. If concentrations of PCP in affected media are below protective levels (i.e., do not pose an unacceptable health risk) and do not exhibit hazardous waste characteristics, the affected media are considered to no longer contain an F032 hazardous waste. This would allow the media to be disposed of as a non-hazardous waste. Appendix A includes DEQ's guidance for conducting an NLCI Determination, with Appendix B including an example of an NLCI Determination issued for the site, pertaining to specific volume of PCP-impacted soil prior to disposal. The guidance and NLCI Determination describe the protocols and criteria to make this Determination and can aid in future NLCI Determinations. An NLCI Determination does not supersede other SLs (i.e., clean fill), it only removes the designation of hazardous waste from the media. Non-hazardous soil will require disposal at a lined Subtitle D permitted landfill, and non-hazardous water would be disposed of at a permitted wastewater treatment facility and/or solidified for Subtitle D landfill disposal.

Clean Fill SLs. The DEQ has developed guidance and clean fill SLs for soil (DEQ 2014). If contaminant concentrations in excavated soil are below clean fill SLs and meet NLCI criteria, the soil can be used as unrestricted clean fill for upland placement on and off the site, with the exception that soil cannot be

placed in a location where surface water would be affected. Clean fill SLs are based on risk-based concentrations (RBCs) for residential use, ecological SLs for terrestrial receptors, and background levels.

Solid Waste Regulations. The DEQ has enacted regulations applicable for the off-site disposal and/or beneficial use of contaminated soil, through which the DEQ may authorize contaminated soil to be placed at an off-site location other than a permitted landfill. Soil must meet NLCI criteria and be designated as non-hazardous.

Any soil not meeting clean fill SLs would fall under DEQ's solid waste regulations (Oregon Administrative Rules (OAR) 340-093). Typically, contaminated soil is disposed of in a permitted landfill. Under OAR 340-093-0050(5), the DEQ can authorize the short-term (6 months) disposal of contaminated soil at an off-site disposal site, other than a landfill, through a solid waste letter of authorization (SWLA). Disposal of contaminated soil would be more easily managed by disposal at a permitted landfill.

Another alternative is beneficial use of contaminated soil as allowed under OAR 340-0930-0260 to -0290. The DEQ must approve the use of soil through a standing or case-specific Beneficial Use Determination (BUD). For the BUD, contaminant concentrations are compared to risk-based criteria (e.g., RBCs) applicable to the proposed off-site placement location. The use may also have other constraints including covering the contaminated soil with clean soil.

Risk-Based Concentrations. Based on toxicity data and standard exposure factors, the DEQ has calculated RBCs to estimate contaminant concentrations in environmental media that are considered protective of humans, including sensitive groups, over a lifetime. RBCs are used to assess if contaminant concentrations might pose an unacceptable health risk. RBCs are also used for NLCI Determination criteria. RBCs may be revised in the future, so the most current RBC values should be used to make an NLCI Determination. The NLCI Determination in Appendix B is only valid for the specific soil pile referenced and is based on current RBCs (DEQ 2015). If RBCs change, the updated RBCs must be used to obtain an NLCI Determination from the DEQ.

National Pollution Discharge Elimination System (NPDES). NPDES permits set regulatory benchmarks for surface water discharge to a storm sewer system, including runoff from the site during earthwork activities. If an NPDES permit is required for construction activities (usually for disturbing one acre or more) it may allow for land application of groundwater.

Alternatively, municipalities may allow for direct groundwater disposal at their wastewater treatment plant facilities pending analysis of groundwater or through municipal sanitary sewer piping to their treatment facilities. Doing so would require prior approval from the municipality.

4.2 Identification of Potentially Contaminated Soil and Groundwater

Each party involved in any earthwork-related construction activities at the site shall be solely responsible for identification of contaminated soil and groundwater. Each contractor shall monitor

soil, groundwater, vapors, and any waste material for evidence of contamination. If site personnel observe media exhibiting characteristics of contaminant impacts, the media in question shall be identified as potentially impacted and handled and characterized as described in Section 4.3. The following field observations can be used to screen potentially impacted media:

- Staining of soil;
- Chemical or petroleum odors;
- Measurements made with a photoionization detector;
- Sheen on water;
- Sheen on moist or saturated soil; and
- Groundwater, if removed in the proximity of impacted soils.

Note that the absence of these characteristics does not necessarily imply that the media does not contain contaminants. Contaminant concentrations at the site are likely only detectable with the use of environmental testing equipment or analytical testing. As such, chemical analysis of excavated soil or removed groundwater is highly recommended.

If unexpected hazardous or contaminated materials are encountered, the contractors shall:

- Stop all work in that area;
- Notify the property owner immediately;
- Ensure no contaminated material is hauled from the site;
- Remove the work force from the immediate area of the contamination;
- Involve an environmental consultant and/or the DEQ; and
- Secure the area from access by the public until such time as all parties involved have verified that site work can be completed in accordance with the HASP and this CMMP.

4.3 Handling of Contaminated Media

If known or suspect contaminated soil, groundwater, or other media is discovered during construction or maintenance activities, care should be taken to minimize worker exposure to contamination in accordance with the site-specific HASP. The involved entities should be notified of suspect media discovery, the location of its discovery, and where the media will be stored pending characterization and subsequent disposal as soon as possible. Contaminant characterization should be performed in accordance with Section 4.4.

4.3.1 Soil/Solid Media

Because low levels of contamination have been detected in various samples obtained in the area of the former mill, any soil or other solid media (i.e., buried debris) generated from the upland LOF should be considered contaminated unless testing determines otherwise. Handling procedures for soil from the upland LOF is based on the level of known or suspected contamination and is broken into two

categories: clearly contaminated soil with suspected or confirmed contaminants at relatively high concentrations; and other potentially "clean" or minimally/negligibly contaminated soil.

Contaminated Soil. Soil and other solid media (i.e. buried debris) from the upland LOF with suspected or confirmed contamination should be segregated from other media and secured within the upland LOF to minimize the risk of spreading contamination. These media should be stockpiled within the upland LOF on a plastic liner with suitable thickness as to not tear from construction activities. Site workers will utilize BMPs for erosion control (see Section 4.5). Soil or solid media showing obvious signs of contamination should be analyzed as described in Section 4.4 prior to removal from the upland LOF or reuse within the LOF. Handling of contaminated soil should be conducted in a manner that does not generate visible dust in the work area. Access to contaminated soil and other solid media should be restricted by fencing or other physical barriers to prevent contact by unauthorized personnel.

"Clean" Soil. Potentially "clean" (minimally or negligibly contaminated) soils removed during construction activities should be kept separate from any soil with known or suspected contamination. Care should be taken to avoid mixing "clean" media with soil or solid media showing obvious signs of contamination. "Clean" soils may be re-used as backfill within the upland LOF, provided their placement does not result in an unacceptable risk (i.e., does not exceed applicable RBCs for direct contact if placed within 3 feet of the ground surface). It is also preferable to place the soil from where it was excavated. "Clean" soils cannot be reused outside of the upland LOF unless analytical testing shows that the soil meets DEQ's NLCI Determination criteria (Appendices A and B) and clean fill guidelines (DEQ 2014).

Transport and Disposal. For transport and disposal of hazardous soil (e.g., F032 listed), additional registration, storage, labeling, manifesting, and a licensed hazardous waste transporter are required. Hazardous soil will be loaded into plastic-lined drop boxes or a truck for transportation to a Resource Conservation and Recovery Act (RCRA) Subtitle C landfill. Each truck or drop box will be properly placarded and covered prior to leaving the site and during transport. Loading should be conducted in a manner that does not generate visible dust. Loading areas will be lined when working with contaminated soil and any loose soil will be brushed from the exterior of all trucks and/or drop boxes and placed into the truck or drop box prior to leaving the stockpile area. All soil will be transported under uniform hazardous waste manifests to the permitted landfill for final disposal. Soil that can be designated as non-hazardous per an NLCI Determination (such as in Appendix B) can be disposed of in a Subtitle D landfill. Loading and transport of non-hazardous soils should also follow the above procedures.

4.3.2 Groundwater

Groundwater accumulated from excavated saturated soils or from dewatering of excavations within the upland LOF shall be transferred to containment storage tanks or drums pending characterization. Tanks and drums should be closed to the extent practical to minimize ambient air impacts and reduce the risk to workers and the environment. If contaminated groundwater is encountered and removal is not necessary, the groundwater may be left in the excavation provided that: (1) backfilling of the excavation is done slowly as not to allow the water to rise above the seasonally high groundwater level;

and (2) water is not directed to another area. Utility trenches excavated to depths below the seasonally high groundwater table may also have a bentonite plug requirement as discussed in Section 5.

4.4 Analytical Protocols for Media Characterization

Soil and groundwater waste characterization should adequately determine the nature and magnitude of contamination for all materials slated for off-site disposal. To ensure sample quality, samples should undergo a minimal amount of disturbance during sample collection. Consult with the waste disposal facility for the most current requirements for sampling and analysis to assure acceptance of the transported waste materials by the facility. These may include composite sampling or other methods to help reduce overall analytical costs.

Generally, all sample containers should be filled to the top, leaving no observable head space. Samples should then be stored in a cooler at 4°C ± 2°C from collection to receipt by the analytical laboratory. Chain of custody documentation must be maintained. The laboratory must be certified by Oregon and/or National Environmental Laboratory Accreditation Program (ORELAP and NELAP, respectively). Samples of "clean" excavated soil for reuse outside the upland LOF should be analyzed for VOCs by EPA Method 8260; gasoline-range hydrocarbons by Northwest Method NWTPH-Gx; diesel-range hydrocarbons by Northwest Method NWTPH-Dx; SVOCs by EPA Method 8270D and/or 8270-SIM; lead by EPA Method 6010 or 6020; and dioxins/furans by EPA Method 1613B. For VOC analysis in soil, sampling should be performed using EPA Method 5035 collection method.

Method reporting limits for the above tests shall be consistent with industry standards and less than that required for disposal or regulatory screening criteria (e.g., clean fill guidelines of DEQ [2014]), as appropriate.

4.5 Erosion Control

Any future earthwork-related activities at the site may require an erosion control plan or permit by the appropriate regulatory agency. The contractor should take the appropriate measures to prevent erosion of soils from earthwork areas on the property, particularly the upland LOF. Based on the nature and scope of the activities, these may include, installation of silt fencing, use of filter bags/fabrics, or modifying the work schedule to minimize site activities during storm events.

When working with clearly contaminated soil, erosion control measures will include installing a berm around each stockpile sufficient to ensure physical containment of the materials and to contain any potential runoff due to incidental accumulation of groundwater or precipitation inside the berm. The stockpile should also be covered, as practical, to minimize impacts to workers and the potential for contaminant migration due to wind and/or stormwater erosion.

The contractor should consider surface water movement when selecting areas for stockpiling. Runoff and/or pooling can further spread contamination across, and off, the upland LOF. During excavation activities, the contractor should also use all appropriate measures to minimize stormwater from entering the excavation where contaminated soil is present or suspected.

4.6 Disposal Options

Transportation of contaminated media off the site requires specific manifesting, licensing, labeling/placard, and insurance requirements. Under no circumstances should contaminated media leave the upland LOF without approval by the DEQ (e.g., SWLA, BUD), a permitted off-site disposal, or treatment facility.

Contaminated soils that meet the requirements of the NLCI Determination can be sent to a Subtitle D landfill; otherwise, soil must be sent to an RCRA Subtitle C landfill. "Clean" soils may be re-used as backfill within the upland LOF and where it will not pose an unacceptable human health risk; preferably this would be the area the soil was excavated from. For re-use off the site, soils must meet the NLCI Determination (Appendices A) and DEQ's clean fill guidelines (DEQ 2014), or be managed per an approved SWLA or BUD. Otherwise, excess "clean" soil must be disposed of at an appropriate landfill because low levels of contamination may even be present in "clean" soil.

Loading and transportation of media should be conducted in a manner that prevents the release of contamination to other areas within the upland LOF and especially areas outside the upland LOF. Loading of soil should be conducted in a manner that does not generate visible dust in the work area. Prior to departure from the loading area, all loose soils should be brushed from the truck and returned to the stockpile or placed in the truck. Any truck leaving the site should be covered by a tarp (for soil) or placed in a containment device (e.g., roll-off box, drum) to reduce the risk of spreading contamination within and outside the upland LOF.

Containerized groundwater may be transferred to an off-site disposal or treatment facility. Other options include on-site treatment with land application as permitted by the DEQ. If analytical results indicate that water meets DEQ's residential tap water RBCs, water may be discharged to the ground surface within the upland LOF; no runoff to surface water, drainage ditches, or stormwater pipes is allowed.

4.7 Permits and Approvals

All involved parties are responsible for obtaining the appropriate permits for construction activities at the site. These may include, but are not limited to, general construction/erosion control permits, disposal permits, discharge permits, and on-site treatment permits. For disposal of soil and water, the landfill or treatment facility should be contacted regarding their acceptance and chemical analysis requirements prior to beginning work. The landfill or treatment facility may accept the data listed herein for disposal characterization; however, it is likely that more recent data will be required for profiling.

5.0 ADDITIONAL CONSIDERATIONS FOR CONSTRUCTION PROJECTS

For any site construction projects, other controls and restrictions need to be considered to prevent or mitigate future exposures to and migration of site contamination. These considerations are as follows and should be included in the design and implementation of future construction projects.

Vapor Intrusion. Based on currently available data, vapor intrusion is not likely to be a concern within the upland LOF. If clearly contaminated soil or groundwater are found and VOC analyses identifies that a vapor intrusion risk may be present, engineered controls (i.e., vapor barrier, fresh air exchange, floor sealing) may be required to assist in keeping indoor air concentrations below applicable RBCs.

Utility Trenches. Contaminated groundwater can move preferentially along backfill used in utility trenches, thus resulting in the migration of contamination beyond the upland LOF. For utility trenches deeper than 3 feet that enter, exit, or cross the upland LOF, a bentonite plug shall be placed in the trench where contamination is observed to cease or, if no contamination is observed, at the boundary of the upland LOF. The bentonite plug should fill the width of the trench for at least a 1-foot length of trench from 1 foot bgs to the bottom of the trench and shall be installed in accordance with the engineering specifications for the construction project.

Drilling Activities. Drilling through contaminated media poses an additional environmental concern because of the potential for downward movement of contamination. Drilling within the upland LOF shall be conducted in accordance with OWRD regulations and in a manner that does not allow for vertical migration of shallow groundwater contamination to deeper depths.

6.0 REFERENCES

Baker Environmental 2000. Phase I Environmental Assessment Report, Reservation Ranch, Highway 101, Bandon, Oregon. Coos County Tax Lots No. 28 14 17C-1000, 1001 & 1002. February 10, 2000.

Cascadia Geoservices 2015a. Phase I Environmental Site Assessment, Rogge Property, Highway 101, Bandon, Oregon 97420. March 24, 2015.

Cascadia Geoservices 2015b. Phase 2 Environmental Site Assessment, Rogge Property, Highway 101, Bandon, Oregon 97420. August 2015.

Cascadia Geoservices 2016a. Independent Cleanup Pathway, Sampling Report for Rogge Planner Facility, Highway 101, Bandon, Oregon. Coos County Tax Lots No 28 14 17C-1000, 1001. May 18, 2016.

Cascadia Geoservices 2016b. Level I – Site Ecology Scoping Report for Rogge Planner Facility, Highway 101, Bandon, Oregon. Coos County Tax Lots No 28 14 17C-1000, 1001. June 27, 2016.

DEQ 2001. Guidance for Ecological Risk Assessment. Level II – Screening. December 2001.

DEQ 2007. Guidance for Assessing Bioaccumulative Chemicals of Concern in Sediment. January 31, 2007, Updated April 3, 2007.

DEQ 2010. Human Health Risk Assessment Guidance. Table 1. October 2010.

DEQ 2014. Clean Fill Determinations. July 23, 3014.

DEQ 2015. Excel® Spreadsheet for Risk Based Concentrations for Individual Chemicals. November 1, 2015.

DEQ 2018. Environmental Cleanup Site Information Database for ECSI No. 6048. Accessed in March 2018 at: http://www.oregon.gov/deq/Hazards-and-Cleanup/env-cleanup/Pages/ecsi.aspx.

EPA 2007c. Ecological Soil Screening Levels for Pentachlorophenol – Interim Final. OSWER Directive 9285.7-58. Issued March 2005, Revised April 2007.

EPA 2007e. Ecological Soil Screening Levels for Polycyclic Aromatic Hydrocarbons (PAHs) – Interim Final. OSWER Directive 9285.7-78. June 2007.

EPA 2017. Regional Screening Levels. June 2017.

Hart Crowser 2017. Risk Screening Evaluation Report, Former Rogge Planer Mill, Highway 101, Bandon, Oregon. November 9, 2017.

Hart Crowser 2018. Risk Screening Evaluation Addendum – Recreational User, Former Rogge Planer Mill, Highway 101, Bandon, Oregon. January 26, 2018.

OWRD 2017. Water well log and water rights databases. Accessed February 2017 at: http://apps.wrd.state.or.us/apps/gw/well_log/Default.aspx

Table 1 - Soil Chemical Analyses Results: TPH
Former Rogge Planer Mill
Bandon, Oregon

Sample	Date	Depth in Feet	Total Petroleum Hydrocarbons			
			Gasoline	Diesel	Oil	Diesel & Oil
March 2016 Investigation			Concentration in mg/kg (ppm)			
TP-1	16-Mar-16	1.0	<21	<52	<100	<100
TP-1	16-Mar-16	4.5	<22	<56	<110	<110
TP-2	16-Mar-16	1.0	<21	<53	**280**	**280**
TP-2	16-Mar-16	6.5	<22	<54	**250**	**250**
TP-3	16-Mar-16	1.5	<24	**150**	**1,200**	**1,350**
TP-3	16-Mar-16	4.0	<19	**130**	**760**	**890**
TP-5	16-Mar-16	1.5	<21	<52	**250**	**250**
Human Health RBCs						
Direct Contact - Recreational User			1,200	1,100		1,100
Direct Contact - Occupational Worker			20,000	14,000		14,000
Direct Contact - Construction Worker			9,700	4,600		4,600
Direct Contact - Excavation Worker			>Max	>Max		>Max
Vapor Intrusion - Recreational User			94	>Max		>Max
Vapor Intrusion - Occupational Worker			>Max	>Max		>Max
Volatilization to Outdoor Air - Recreational User			5,900	>Max		>Max
Volatilization to Outdoor Air - Occupational Worker			69,000	>Max		>Max
Leaching to Groundwater - Recreational User			31	9,600		9,600
Leaching to Groundwater - Occupational Worker			130	>Max		>Max
Ecological SLVs						
Plants			-	-	-	-
Invertebrates			-	-	-	-
Non-T&E Birds			-	-	-	-
Non-T&E Mammals			-	-	-	-

Notes:
Total petroleum hydrocarbons (TPH) by Northwest Method NWTPH-HCID.
Results reported on a dry weight basis.
Bold denotes a detected concentration.
Shading denotes a detected analyte concentration exceeding its respective screening criterion (exceeded screening criterion is also shaded).
mg/kg (ppm) = Milligrams per kilogram (parts per million)
< = Not detected above the indicated laboratory reported detection limit.
Total diesel and oil is the sum of detected diesel and oil concentrations.
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2015) and by substituting 350 day/yr exposure frequency for an urban resident. As no RBC for oil-range hydrocarbons is available, the RBC for diesel is used for oil and for total diesel and oil.
Ecological screening level values (SLVs), including for non-threatened and endangered (T&E) species, are not listed by DEQ (2001).
>Max = The RBC for this constituent and pathway is above 1,000,000 mg/kg.

Table 2 - Soil Chemical Analyses Results: SVOCs
Former Rogge Planer Mill
Bandon, Oregon

			LPAHs								HPAHs										Summations			Other Detected SVOC
Sample	Date	Depth in Feet	Acenaphthene	Acenaphthylene	Anthracene	Fluorene	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Phenanthrene	Benz(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(g,h,i)perylene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Indeno(1,2,3-cd)pyrene	Pyrene	LPAHs	HPAHs	Total Carcinogenic PAHs (BaP Eq)	Pentachlorophenol (PCP)
			Concentration in mg/kg (ppm)																					
March 2016 Investigation																								
TP-2	16-Mar-16	1.0	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	0.10
TP-2	16-Mar-16	5.5	<0.0049	<0.0049	<0.0049	<0.0049	0.0050	0.017	0.010	0.0081	<0.0049	<0.0049	<0.0049	<0.0049	0.023	<0.0049	<0.0049	<0.0049	<0.0049	0.0068	0.041	0.030	0.00023	0.15
TP-4	*16-Mar-16*	1.0	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	<0.097	1.9
TP-5	16-Mar-16	1.5	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	<0.0047	0.21
TP-7	16-Mar-16	1.5	<0.053	<0.053	<0.053	<0.053	<0.053	<0.053	<0.053	<0.053	<0.053	<0.053	0.091	0.25	0.080	0.063	<0.053	<0.053	<0.053	<0.053	<0.053	0.48	0.012	1.9
TP-7	16-Mar-16	3.0	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046	0.058	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046	<0.046	0.058	0.00058	0.82
July 2016 Investigation																								
TP4-SS1	27-Jul-16	1.0	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	0.0074	0.0055	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	<0.0051	0.0129	<0.0051	<0.0051	<0.10
TP4-SS2	27-Jul-16	1.5	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	<0.0070	0.0092	<0.0070	0.0092	<0.0070	<0.14
TP4-SS3	27-Jul-16	1.0	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.11
TP4-SS4	27-Jul-16	2.0	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.0066	<0.13
TP4-SS5	27-Jul-16	1.5	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.0056	<0.11
TEFs to Calculate BaP Eq			-	-	-	-	-	-	-	-	0.1	1.0	0.1	0.01	0.01	0.001	1.0	-	0.1	-	-	-	-	-
Human Health RBCs																								
Direct Contact - Recreational User			4,700	-	23,000	3,100	"18"	"240"	12	-	0.17	0.017	0.17	1.7	-	17	0.017	2,400	0.17	1,800	-	-	0.017	1.3
Direct Contact - Occupational Worker			70,000	-	350,000	47,000	"73"	"3,000"	23	-	2.9	0.29	2.9	29	-	290	0.29	30,000	2.9	23,000	-	-	0.29	4.0
Direct Contact - Construction Worker			21,000	-	110,000	14,000	-	-	580	-	24	2.4	24	240	-	2,400	2.4	10,000	24	7,500	-	-	2.4	34
Direct Contact - Excavation Worker			590,000	-	>Max	390,000	-	-	15,000	-	660	67	670	6,700	-	67,000	67	280,000	670	210,000	-	-	67	960
Vapor Intrusion - Recreational User			>Max	-	>Max	>Max	-	-	15	-	>C_{sat}	NV	NV	NV	-	NV	NV	NV	NV	>Max	-	-	NV	NV
Vapor Intrusion - Occupational Worker			>Max	-	>Max	>Max	-	-	83	-	>C_{sat}	NV	NV	NV	-	NV	NV	NV	NV	>C_{sat}	-	-	NV	NV
Volatilization to Outdoor Air - Recreational User			>Max	-	>Max	>Max	-	-	15	-	>C_{sat}	NV	NV	NV	-	NV	NV	NV	NV	>Max	-	-	NV	NV
Volatilization to Outdoor Air - Occupational Worker			>Max	-	>Max	>Max	-	-	83	-	>C_{sat}	NV	NV	NV	-	NV	NV	NV	NV	>C_{sat}	-	-	NV	NV
Leaching to Groundwater - Recreational User			>C_{sat}	-	>C_{sat}	>C_{sat}	-	-	0.18	-	1.2	0.97	>C_{sat}	>C_{sat}	-	>C_{sat}	3.2	>C_{sat}	>C_{sat}	>C_{sat}	-	-	0.97	0.11
Leaching to Groundwater - Occupational Worker			>C_{sat}	-	>C_{sat}	>C_{sat}	-	-	0.34	-	>C_{sat}	>C_{sat}	>C_{sat}	>C_{sat}	-	>C_{sat}	>C_{sat}	>C_{sat}	>C_{sat}	>C_{sat}	-	-	>C_{sat}	0.17
Ecological SLVs																								
Plants			20*	-	-	-	-	-	10*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.0
Invertebrates			-	-	-	30*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	28*	18*	-	31
Non-T&E Birds			-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11
Non-T&E Mammals			-	-	-	-	-	-	1,950*	-	-	525*	-	-	-	-	-	-	-	-	500*	5.5*	-	14

Notes:
Semivolatile organic compounds (SVOCs) and polycyclic aromatic hydrocarbons (PAHs) by EPA Methods 8270D and 8270-SIM.
Results reported on a dry weight basis.
Bold denotes a detected concentration.
Shading denotes a detected analyte concentration exceeding its respective screening criterion (exceeded screening criterion is also shaded).
Italicization indicates a sample location that has been removed by excavation; as such, it is not compared against screening levels.
mg/kg (ppm) = Milligrams per kilogram (parts per million).
- = Not available or not applicable.
< = Not detected above the indicated method reporting limit (MRL).
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2015) and by substituting 350 day/yr exposure frequency for an urban resident. RBCs in quotes (") are from EPA Regional Screening Levels (2017) for resident and industrial soil for recreational users and occupational workers, respectively.
Ecological screening level values (SLVs) are based on soil screening levels (SSLs; EPA 2007a,b). If no SSL was available, then the SLV from DEQ (2001) is listed (*). Per DEQ (2001), the ecological SLV was multiplied by 5 times to derive a non-threatened and endangered (T&E) terrestrial SLV for birds and mammals.

LPAHs = Low molecular weight PAHs.
HPAHs = High molecular weight PAHs.
TEFs = Toxicity equivalency factors.
>C_{sat} = RBCs above the maximum saturation possible in soil.
>Max = The RBC for this constituent and pathway is above 1,000,000 mg/kg.
NV = Analyte is not volatile.
Benzo(a)pyrene equivalence (BaP Eq) calculated per human health risk assessment guidance (DEQ 2010).
Undetected values are not included in summations. If no compounds in a summation group were detected, the total is the highest MRL of the group.

Table 3 - Soil Chemical Analyses Results: VOCs
Former Rogge Planer Mill
Bandon, Oregon

Sample	Date	Depth in Feet	BTEX				Naphthalene
			Benzene	Toluene	Ethylbenzene	Total Xylenes	
			Concentration in mg/kg (ppm)				
May 2015 Investigation							
TP-3	7-May-15	1.4	<0.017	0.0032 J	<0.044	<0.044	<0.044
March 2016 Investigation							
TP-2	16-Mar-16	1.0	-	-	-	-	<0.0051
TP-2	16-Mar-16	6.5	-	-	-	-	**0.010**
TP-4	16-Mar-16	1.0	-	-	-	-	<0.097
TP-5	16-Mar-16	1.5	-	-	-	-	<0.0047
TP-7	16-Mar-16	1.5	-	-	-	-	<0.053
TP-7	16-Mar-16	3.0	-	-	-	-	<0.046
July 2016 Investigation							
TP4-SS1	27-Jul-16	1.0	-	-	-	-	**0.0074**
TP4-SS2	27-Jul-16	1.5	-	-	-	-	<0.0070
TP4-SS3	27-Jul-16	1.0	-	-	-	-	<0.0056
TP4-SS4	27-Jul-16	2.0	-	-	-	-	<0.0066
TP4-SS5	27-Jul-16	1.5	-	-	-	-	<0.0056
Human Health RBCs							
Direct Contact - Recreational User			12	170	53	1,400	12
Direct Contact - Occupational Worker			37	88,000	150	25,000	23
Direct Contact - Construction Worker			380	28,000	1,700	20,000	580
Direct Contact - Excavation Worker			11,000	770,000	49,000	560,000	16,000
Vapor Intrusion - Recreational User			0.4	$>C_{sat}$	3.0	160	15
Vapor Intrusion - Occupational Worker			2.1	$>C_{sat}$	17	$>C_{sat}$	83
Volatilization to Outdoor Air - Recreational User			27	$>C_{sat}$	85	$>C_{sat}$	15
Volatilization to Outdoor Air - Occupational Worker			50	$>C_{sat}$	160	$>C_{sat}$	83
Leaching to Groundwater - Recreational User			0.051	$>C_{sat}$	0.47	43	0.18
Leaching to Groundwater - Occupational Worker			0.10	490	0.90	100	0.34
Ecological SLVs							
Plants			-	200*	-	1*	10*
Invertebrates			-	-	-	-	-
Non-T&E Birds			-	-	-	-	-
Non-T&E Mammals			16,500*	7,200*	-	600*	1,950*

Notes:
Volatile organic compounds (VOCs) by EPA Method 8260B. Only benzene, toluene, ethylbenzene, and total xylenes (BTEX) and those VOCs detected at least once are shown. Naphthalene concentrations for March 2016 and July 2016 are by EPA Method 8270-SIM and are from Table 2.
Results reported on a dry weight basis.
Bold denotes a detected concentration.
mg/kg (ppm) = Milligrams per kilogram (parts per million).
- = Not available.
< = Not detected above the indicated method reporting limit.
J = Estimated concentration between method detection limit and method reporting limit.
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2015) and by substituting 350 day/yr exposure frequency for an urban resident.
*Ecological screening level values (SLVs) are based on DEQ (2001). Per DEQ (2001), the ecological SLV was multiplied by 5 times to derive a non-threatened and endangered (T&E) terrestrial SLV for birds and mammals.
$>C_{sat}$ = RBCs above the maximum saturation possible in soil.

Table 4 - Soil Chemical Analyses Results: Dioxins/Furans
Former Rogge Planer Mill
Bandon, Oregon

Dioxins/Furans	Sample: / Date: / Depth (ft.):	Detected Concentrations	Toxicity Equivalence			
			Humans and Mammals		Birds	
		E-Comp 30-Mar-17 0.7 - 1.0	Mammal TEFs	E-Comp 30-Mar-17 0.7 - 1.0	Bird TEFs	E-Comp 30-Mar-17 0.7 - 1.0
		Conc. in µg/kg (ppb)		TEQ Conc. in µg/kg (ppb)		TEQ Conc. in µg/kg (ppb)
2,3,7,8-TCDD		<0.000119	1.0	-	1.0	-
1,2,3,7,8-PeCDD		0.00155 J	1.0	0.0016	1.0	0.0016
1,2,3,4,7,8-HxCDD		0.00153 J	0.1	0.00015	0.05	0.000077
1,2,3,6,7,8-HxCDD		0.0203	0.1	0.0020	0.01	0.00020
1,2,3,7,8,9-HxCDD		0.00417	0.1	0.00042	0.1	0.00042
1,2,3,4,6,7,8-HpCDD		0.134	0.01	0.0013	0.001	0.00013
OCDD		0.814	0.0003	0.00024	0.0001	0.000081
2,3,7,8-TCDF		0.000976	0.1	0.00010	1.0	0.00098
1,2,3,7,8-PeCDF		0.000705 J	0.03	0.000021	0.1	0.000071
2,3,4,7,8-PeCDF		0.00207 J	0.3	0.00062	1.0	0.0021
1,2,3,4,7,8-HxCDF		0.00177 J	0.1	0.00018	0.1	0.00018
1,2,3,6,7,8-HxCDF		0.00214 J	0.1	0.00021	0.1	0.00021
1,2,3,7,8,9-HxCDF		<0.000502 K	0.1	-	0.1	-
2,3,4,6,7,8-HxCDF		0.00436	0.1	0.00044	0.1	0.00044
1,2,3,4,6,7,8-HpCDF		0.068	0.01	0.00068	0.01	0.00068
1,2,3,4,7,8,9-HpCDF		0.00210 J	0.01	0.000021	0.01	0.000021
OCDF		0.0927	0.0003	0.000028	0.0001	0.0000093
Total TCDD TEQ				0.0080		0.0071
				Conc. in mg/kg (ppm)		Conc. in mg/kg (ppm)
				8.0E-06		7.1E-06
Human Health RBCs						
Direct Contact - Recreational User				5.9E-06		-
Direct Contact - Occupational Worker				1.6E-05		-
Direct Contact - Construction Worker				1.7E-04		-
Direct Contact - Excavation Worker				4.8E-03		-
Vapor Intrusion - Recreational User				2.4E-02		-
Vapor Intrusion - Occupational Worker				1.3E-01		-
Volatilization to Outdoor Air - Recreational User				2.4E-02		-
Volatilization to Outdoor Air - Occupational Worker				1.3E-01		-
Leaching to Groundwater - Recreational User				1.6E-05		-
Leaching to Groundwater - Occupational Worker				3.1E-05		-
Ecological SLVs						
Plants				-		-
Invertebrates				-		-
Non-T&E Birds				-		2.8E-04
Non-T&E Mammals				6.0E-04		-

Notes:
Dioxins/furans by EPA Method 1613B.
Results reported on a dry weight basis.
Bold denotes a detected concentration.
Shading denotes an exceedance of a screening level. The exceeded screening level is also shaded.
µg/kg (ppb) = Micrograms per kilogram (parts per billion); mg/kg (ppm) = milligrams per kilogram (parts per million).
- = Not detected for toxicity equivalence (TEQ) calculation or not applicable.
< = Not detected above the indicated method reporting limit.
J = Estimated concentration between method detection limit and method reporting limit.
K = Elevated detection limit due to ion abundance ratios outside the quality control limits.
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2015) and by substituting 350 day/yr exposure frequency for an urban resident.
*Ecological screening level values (SLVs) are based on DEQ (2001). Per DEQ (2001), the ecological SLV was multiplied by 5 times to derive a non-threatened and endangered (T&E) terrestrial SLV for birds and mammals. There are no SLVs for plants and invertebrates.
2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) TEQ calculated using toxicity equivalency factors (TEFs) in DEQ's human health risk assessment and bioaccumulation guidance (DEQ 2007, 2010). Undetected values are not included in total.

Table 5 - Groundwater Chemical Analyses Results: TPH
Former Rogge Planer Mill
Bandon, Oregon

Sample	Date	Depth in Feet	Total Petroleum Hydrocarbons			
			Gasoline	Diesel	Oil	Diesel and Oil
			Concentration in µg/L (ppb)			
March 2016 Investigation						
TP-3	16-Mar-16	4.0	**23**	**310**	**610**	**920**
Human Health RBCs						
Tap Water Use - Recreational User			110	100		100
Tap Water Use - Occupational Worker			450	430		430
Vapor Intrusion - Recreational User			22,000	>S		>S
Vapor Intrusion - Occupational Worker			>S	>S		>S
Volatilization to Outdoor Air - Recreational User			>S	>S		>S
Volatilization to Outdoor Air - Occupational Worker			>S	>S		>S
Groundwater in Excavation			14,000	>S		>S

Notes:
Hydrocarbon identification for total petroleum hydrocarbons (TPH) by Northwest Method NWTPH-HCID.
Bold denotes a detected concentration.
Shading denotes an exceedance of a screening level. The exceeded screening level is also shaded.
Total diesel and oil is the sum of detected diesel and oil concentrations.
µg/L (ppb) = Micrograms per liter (parts per billion).
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2015) and by substituting 350 day/yr exposure frequency for an urban resident. As no RBC for oil-range hydrocarbons is available, the RBC for diesel is used for oil and for total diesel and oil.
>S = The RBC exceeds the solubility limit.

Table 6 - Groundwater Chemical Analyses Results: SVOCs
Former Rogge Planer Mill
Bandon, Oregon

Sample	Date	Depth in feet	LPAHs								HPAHs										Summations	Other Detected SVOCs					
			Acenaphthene	Acenaphthylene	Anthracene	Fluorene	1-Methylnaphthalene	2-Methylnaphthalene	Naphthalene	Phenanthrene	Benz(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Benzo(g,h,i)perylene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Indeno(1,2,3-cd)pyrene	Pyrene	Total Carcinogenic PAHs (BaP Eq)	Butyl benzyl phthalate	Diethyl phthalate	Di-n-butyl phthalate	3 & 4-Methylphenol	Pentachlorophenol (PCP)	Phenol
			Concentration in µg/L (ppb)																								
May 2015 Investigation																											
TP-2	7-May-15	6.0	<0.095	<0.076	<0.038	<0.057	<0.057	<0.19	<0.38	<0.076	<0.057	<0.038	<0.076	<0.057	<0.057	<0.038	<0.057	<0.048	<0.057	<0.057	<0.076	<0.57	0.11 JB	<0.38	<0.76	<0.67	<0.57
TP-6	7-May-15	4.0	0.11	<0.076	0.024 J	0.042 J	0.041 J	0.054 J	0.11 J	0.042 J	0.021 J	0.029 J	0.030 J	<0.057	<0.057	0.014 J	<0.057	0.072	<0.057	0.058	0.034	0.26 JB	0.34 JB	0.19 JB	0.16 J	0.39 J	0.17 J
March 2016 Investigation																											
TP-4	16-Mar-16	2.5	<0.020	<0.020	<0.020	<0.020	<0.020	<0.025	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	-	-	-	-	0.35	-
TP-6	16-Mar-16	6.0	<0.020	<0.020	<0.020	<0.020	<0.020	<0.025	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	-	-	-	-	0.37	-
July 2016 Investigation																											
TP1	27-Jul-16	9.5	<0.020	0.038	<0.020	<0.020	0.040	0.033	0.035	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	0.022	<0.020	-	-	-	-	<100	-
TP2	27-Jul-16	8.0	0.037	<0.020	<0.020	0.39	0.077	<0.026	0.063	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	<0.020	-	-	-	-	<100	-
TP3	27-Jul-16	10	<0.023	<0.023	<0.023	<0.023	<0.023	<0.030	0.038	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	<0.023	-	-	-	-	<110	-
TEFs to Calculate BaP Eq			-	-	-	-	-	-	-	-	0.1	1.0	0.1	0.01	0.01	0.001	1.0	-	0.1	-	-	-	-	-	-	-	-
Human Health RBCs																											
Tap Water Use - Recreational User			1,200	-	>S	690	"1.1"	"36"	0.39	-	0.022	0.0055	0.055	0.55	-	>S	0.0055	>S	0.055	>S	0.0055	"16"	"15,000"	-	"1,900"	0.076	"5,800"
Tap Water Use - Occupational Worker			2,500	-	>S	1,300	"1.1"	"36"	0.72	-	0.17	0.064	0.64	>S	-	>S	0.064	>S	>S	>S	0.064	"16"	"15,000"	-	"1,900"	0.12	"5,800"
Vapor Intrusion - Recreational User			>S	-	>S	>S	-	-	2,000	-	>S	NV	NV	NV	-	NV	NV	NV	NV	>S	NV	-	-	-	-	NV	-
Vapor Intrusion - Occupational Worker			>S	-	>S	>S	-	-	11,000	-	>S	NV	NV	NV	-	NV	NV	NV	NV	>S	NV	-	-	-	-	NV	-
Volatilization to Outdoor Air - Recreational User			>S	-	>S	>S	-	-	8,500	-	>S	NV	NV	NV	-	NV	NV	NV	NV	>S	NV	-	-	-	-	NV	-
Volatilization to Outdoor Air - Occupational Worker			>S	-	>S	>S	-	-	16,000	-	>S	NV	NV	NV	-	NV	NV	NV	NV	>S	NV	-	-	-	-	NV	-
Groundwater in Excavation			>S	-	>S	>S	"1.1"	"36"	500	-	>S	>S	>S	>S	-	>S	>S	>S	>S	>S	>S	"16"	"15,000"	-	"1,900"	53	"5,800"

Notes:
Semivolatile organic compounds (SVOCs) and polycyclic aromatic hydrocarbons (PAHs) by EPA Methods 8270D and 8270-SIM.
Bold denotes a detected concentration.
Shading denotes a detected analyte concentration exceeding its respective screening criterion (exceeded screening criterion is also shaded).
µg/L (ppb) = Micrograms per liter (parts per billion).
- = Not available or not applicable.
< = Not detected above the indicated method reporting limit (MRL).
B = Compound also detected in method blank.
J = Estimated concentration between method detection limit and method reporting limit.
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2015) and by substituting 350 day/yr exposure frequency for an urban resident. RBCs in quotes ("") are from EPA Regional Screening Levels (2017) for tap water.

LPAHs = Low molecular weight PAHs.
HPAHs = High molecular weight PAHs.
TEFs = Toxicity equivalency factors.
NV = Analyte is not volatile.
>S = The RBC exceeds the solubility limit.
Benzo(a)pyrene equivalence (BaP Eq) calculated per human health risk assessment guidance (DEQ 2010).
Undetected values are not included in summations. If no compounds in a summation group were detected, the total is the highest MRL of the group.

Table 7 - Groundwater Chemical Analyses Results: VOCs
Former Rogge Planer Mill
Bandon, Oregon

Sample	Date	Depth in Feet	BTEX				Chloromethane	4-Isopropyltoluene	Methylene Chloride
			Benzene	Toluene	Ethylbenzene	Total Xylenes			
			Concentration in µg/L (ppb)						
May 2015 Investigation									
TP-2	7-May-15	6.0	<0.20	**0.27 J**	<0.20	<0.60	<0.30	<0.30	**0.25 J**
TP-4	7-May-15	4.5	<0.20	**0.053 J**	<0.20	<0.60	**0.082 J**	<0.30	**0.25 J**
TP-6	7-May-15	4.0	**0.037 J**	**0.038 J**	<0.20	<0.60	<0.30	**0.11 J**	**0.22 J**
Human Health RBCs									
Tap Water Use - Recreational User			1.0	2,200	3	360	340	-	18
Tap Water Use - Occupational Worker			2.1	6,300	7.8	830	790	-	200
Vapor Intrusion - Recreational User			510	>S	1,500	86,000	26,000	-	170,000
Vapor Intrusion - Occupational Worker			2,800	>S	8,200	>S	330,000	-	3,300,000
Volatilization to Outdoor Air - Recreational User			7,400	>S	23,000	>S	440,000	-	2,000,000
Volatilization to Outdoor Air - Occupational Worker			14,000	>S	43,000	>S	1,800,000	-	>S
Groundwater in Excavation			1,800	220,000	4,500	23,000	22,000	-	79,000

Notes:
Volatile organic compounds (VOCs) by EPA Method 8260B. Only benzene, toluene, ethylbenzene, and total xylenes (BTEX) and those VOCs detected at least once in groundwater are shown.
Bold denotes a detected concentration.
µg/L (ppb) = Micrograms per liter (parts per billion).
- = Not available.
< = Not detected above the indicated method reporting limit.
J = Estimated concentration between method detection limit and method reporting limit.
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2015) and by substituting 350 day/yr exposure frequency for an urban resident. RBCs in quotes ("") are from EPA Regional Screening Levels (2017) for tap water.
>S = The RBC exceeds the solubility limit.

Table 8 - Groundwater Chemical Analyses Results: Total Metals
Former Rogge Planer Mill
Bandon, Oregon

Sample	Date	Depth in feet	Antimony	Arsenic	Beryllium	Cadmium	Chromium	Copper	Lead
May 2015 Investigation			Concentration in µg/L (ppb)						
TP-2	7-May-15	6.0	0.57 J	22	1.1 J	0.34 J	310	53	34
TP-6	7-May-15	4.0	1.8 J	19	1.2 J	0.86 J	210	110	43
Human Health RBCs									
Tap Water Use - Recreational User			"7.8"	0.10	>S	>S	55,000[§]	1,500	15
Tap Water Use - Occupational Worker			"7.8"	0.31	330	160	250,000[§]	6,500	15
Groundwater In Excavation			"7.8"	6,300	270,000	130,000	9,400[§]	5,400,000	>S

Sample	Date	Depth in feet	Mercury	Nickel	Selenium	Silver	Thallium	Zinc
May 2015 Investigation			Concentration in µg/L (ppb)					
TP-2	7-May-15	6.0	0.40 B	130	5.5	0.16 J	<5	95
TP-6	7-May-15	4.0	0.65 B	280	4.5 J	0.23 J	<5	250
Human Health RBCs								
Tap Water Use - Recreational User			11	>S	"100"	1,100	"0.2"	"6,000"
Tap Water Use - Occupational Worker			49	3,300	"100"	820	"0.2"	"6,000"
Groundwater In Excavation			>S	13,000,000	"100"	1,100,000	"0.2"	"6,000"

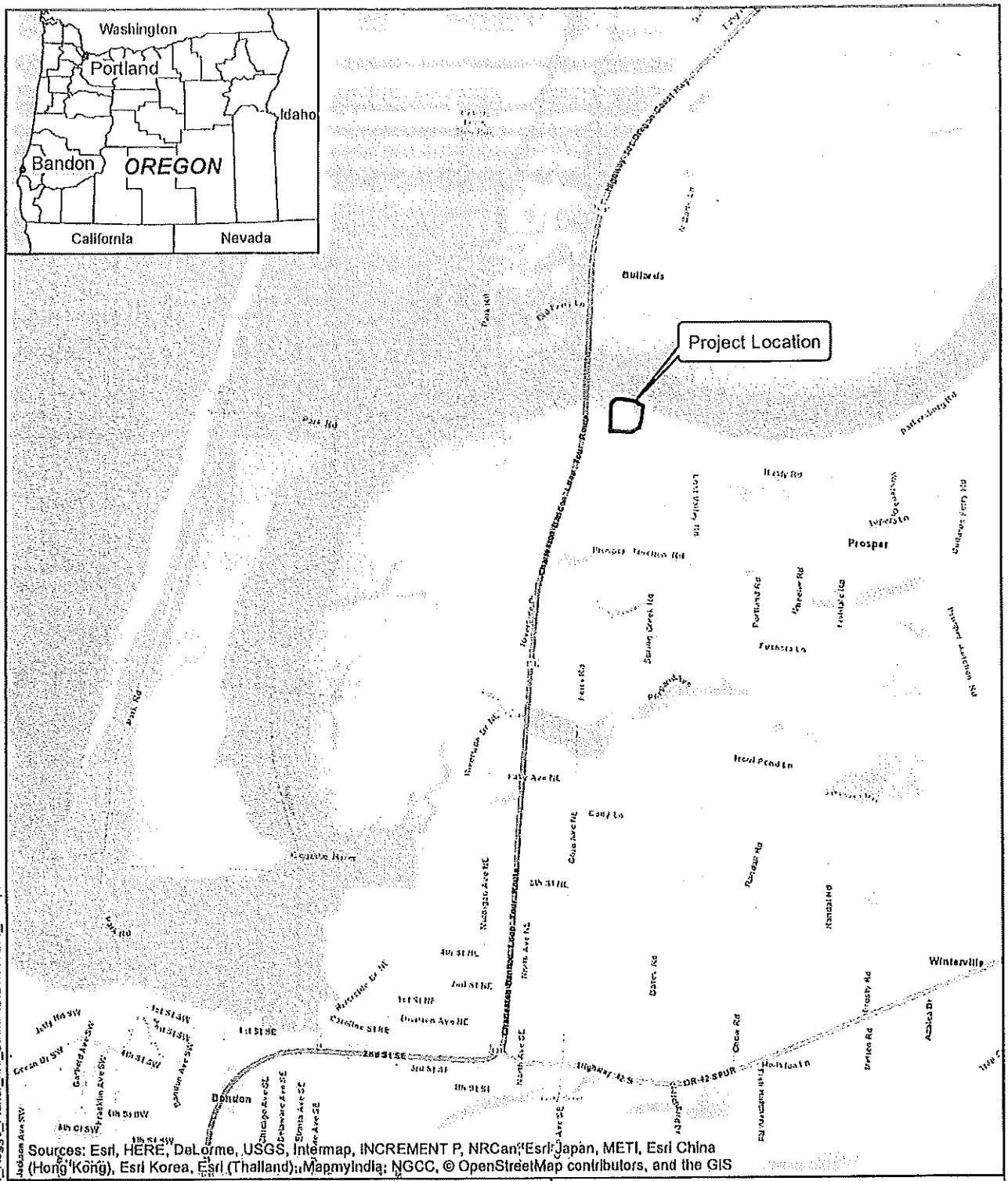
Notes:
Metals by EPA Methods 6020A and 7470A.
Bold denotes a detected concentration.
Shading denotes an exceedance of a screening level. The exceeded screening level is also shaded.
µg/L (ppb) = Micrograms per liter (parts per billion).
- = Not analyzed.
< = Not detected above the indicated laboratory reported detection limit.
J = Estimated value.
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2016) and by substituting 350 day/yr exposure frequency for an urban resident. RBCs in quotes ("") are from EPA Regional Screening Levels (2017) for tap water.
[§]Based on chromium (III) as there is no sources (e.g., plating) for chromium (VI) at the site.
>S = The RBC exceeds the solubility limit.

Table 9 - Groundwater Chemical Analyses Results: Dioxins/Furans
Former Rogge Planer Mill
Bandon, Oregon

		Unfiltered		Filtered		
	Sample:	TP-2	TP-6	TP-1/GW1	TP-2/GW2	TP-3/GW3
	Date:	7-May-15	7-May-15	27-Jul-16	27-Jul-16	27-Jul-16
Dioxins/Furans	Depth (ft.):	6.0	4.0	9.5	8.0	10
		Concentration in µg/L (ppb)				
2,3,7,8-TCDD		<0.0000010	0.000011	<0.0000096	<0.0000095	<0.000011
1,2,3,7,8-PeCDD		0.0000026 J	0.000076	<0.000048	<0.000047	<0.000056
1,2,3,4,7,8-HxCDD		0.0000037 J	0.000041 J	<0.000048	<0.000047	<0.000056
1,2,3,6,7,8-HxCDD		0.000006 J	0.0018	<0.000048	<0.000047	<0.000056
1,2,3,7,8,9-HxCDD		0.0000028 J	0.00025	<0.000048	<0.000047	<0.000056
1,2,3,4,6,7,8-HpCDD		0.000012 J	0.006	0.000065	<0.000047	0.000071
OCDD		0.000056 JB	0.021	0.0012	0.00017	0.00056
2,3,7,8-TCDF		0.0000011 J	0.000072	<0.0000096	<0.0000095	<0.000011
1,2,3,7,8-PeCDF		<0.000047	0.000045 J	<0.000048	<0.000047	<0.000056
2,3,4,7,8-PeCDF		0.0000023 J	0.000088	<0.000048	<0.000047	<0.000056
1,2,3,4,7,8-HxCDF		0.0000029 J	0.00008	<0.000048	<0.000047	<0.000056
1,2,3,6,7,8-HxCDF		0.0000046 J	0.000072	<0.000048	<0.000047	<0.000056
1,2,3,7,8,9-HxCDF		0.000002 J	<0.000047	<0.000048	<0.000047	<0.000056
2,3,4,6,7,8-HxCDF		0.0000041 J	0.00014	<0.000048	<0.000047	<0.000056
1,2,3,4,6,7,8-HpCDF		0.0000067 J	0.0039	<0.000048	<0.000047	<0.000056
1,2,3,4,7,8,9-HpCDF		0.0000039 J	<0.000056	<0.000048	<0.000047	<0.000056
OCDF		0.000016 J	0.0027	<0.000096	<0.000095	<0.000011
	TEFs	Toxicity Equivalence in µg/L (ppb)				
2,3,7,8-TCDD	1.0	-	0.000011	-	-	-
1,2,3,7,8-PeCDD	1.0	0.0000026	0.000076	-	-	-
1,2,3,4,7,8-HxCDD	0.1	0.00000037	0.0000041	-	-	-
1,2,3,6,7,8-HxCDD	0.1	0.00000060	0.00018	-	-	-
1,2,3,7,8,9-HxCDD	0.1	0.00000028	0.000025	-	-	-
1,2,3,4,6,7,8-HpCDD	0.01	0.00000012	0.000060	0.00000065	-	0.00000071
OCDD	0.0003	0.000000017	0.0000063	0.00000036	0.00000051	0.00000017
2,3,7,8-TCDF	0.1	0.00000011	0.0000072	-	-	-
1,2,3,7,8-PeCDF	0.03	-	0.0000014	-	-	-
2,3,4,7,8-PeCDF	0.3	0.00000069	0.000026	-	-	-
1,2,3,4,7,8-HxCDF	0.1	0.00000029	0.0000080	-	-	-
1,2,3,6,7,8-HxCDF	0.1	0.00000046	0.0000072	-	-	-
1,2,3,7,8,9-HxCDF	0.1	0.00000020	-	-	-	-
2,3,4,6,7,8-HxCDF	0.1	0.00000041	0.000014	-	-	-
1,2,3,4,6,7,8-HpCDF	0.01	0.000000067	0.000039	-	-	-
1,2,3,4,7,8,9-HpCDF	0.01	0.000000039	-	-	-	-
OCDF	0.0003	0.0000000048	0.00000081	-	-	-
	Total TCDD TEQ	0.0000063 6.3E-06	0.00047 4.7E-04	0.0000010 1.0E-06	0.00000051 5.1E-07	0.00000088 8.8E-07

Human Health RBC		
Tap Water Use - Recreational User	2.1E-07	2.1E-07
Tap Water Use - Occupational Worker	4.2E-07	4.2E-07
Vapor Intrusion - Recreational User	2.0E-02	2.0E-02
Vapor Intrusion - Occupational Worker	1.1E-01	1.1E-01
Volatilization to Outdoor Air - Recreational User	5.2E-02	5.2E-02
Volatilization to Outdoor Air - Occupational Worker	1.1E-01	1.1E-01
Groundwater in Excavation	4.5E-04	4.5E-04

Notes:
Dioxins/furans by EPA Method 1613B.
Bold denotes a detected concentration.
Shading denotes an exceedance of a screening level. The exceeded screening level is also shaded.
µg/L (ppb) = Micrograms per liter (parts per billion).
- = Not available or not detected for toxicity equivalence (TEQ) calculation.
< = Not detected above the indicated method reporting limit.
B = Compound also detected in method blank.
J = Estimated concentration between method detection limit and method reporting limit.
Human health risk-based concentrations (RBCs) for recreational users are developed using DEQ (2015) and by substituting 350 day/yr exposure frequency for an urban resident.
2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) TEQ calculated using toxicity equivalency factors (TEFs) in DEQ's human health risk assessment guidance (DEQ 2010). Undetected values are not included in total.
>S = The RBC exceeds the solubility limit.



Document Path: F:\Notebooks\15825201_Rogge_Planer_Mill_CMMP\GIS\15825201_VMap.mxd Date: 3/5/2018 User Name: melissaschweitzer

0 1,000 2,000 4,000 Feet

N

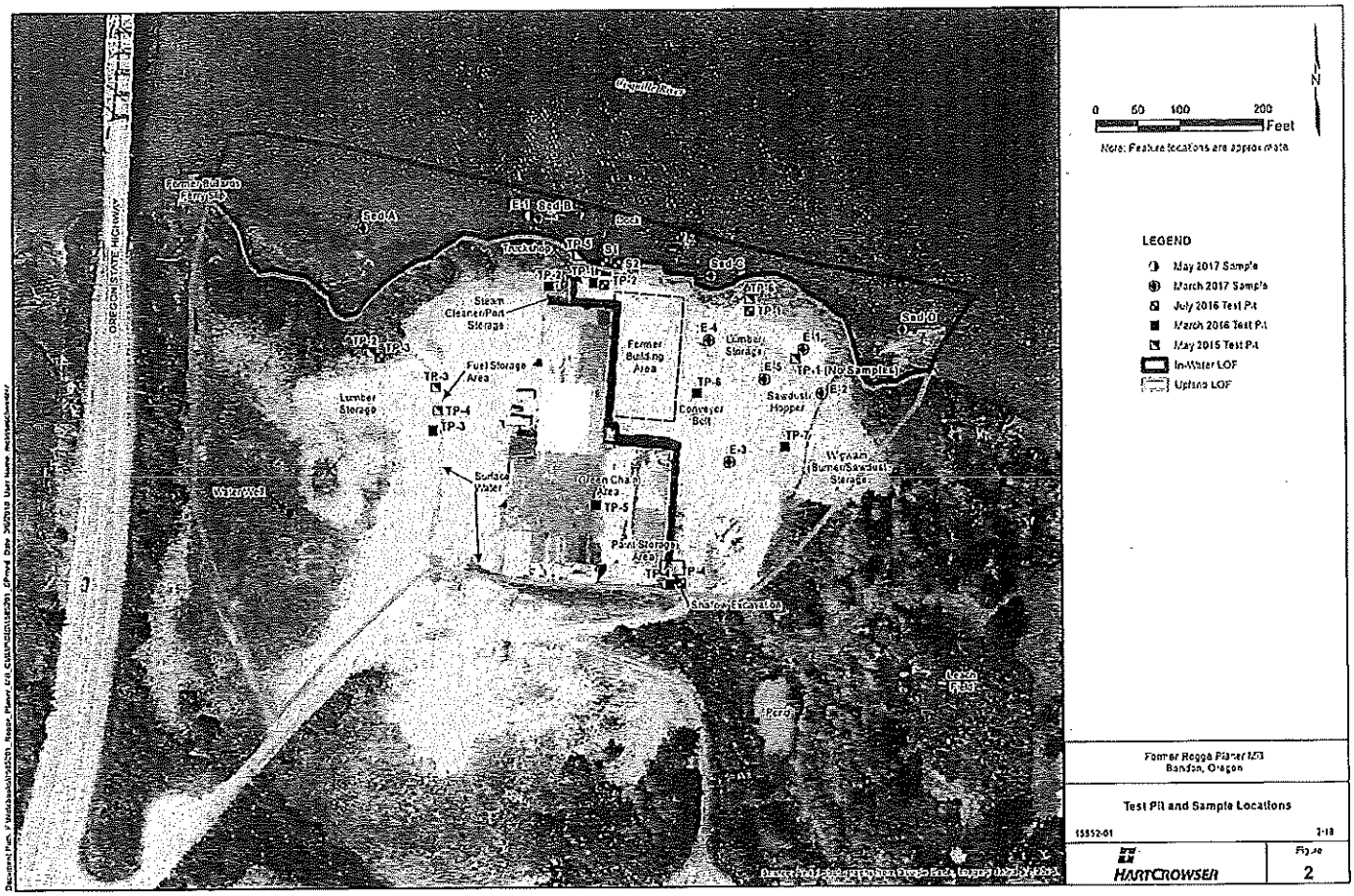
Former Rogge Planer Mill
Bandon, Oregon

Vicinity Map

15825-01 3/18

HARTCROWSER

Figure 1



0 50 100 200 Feet

N

Note: Feature locations are approximate

LEGEND

- May 2017 Sample
- March 2017 Sample
- July 2016 Test Pit
- March 2016 Test Pit
- May 2015 Test Pit
- In-Water LOF
- Upland LOF

Former Regge Planer Mill
Bandon, Oregon

Test Pit and Sample Locations

15852-01 7-18

HARTCROWSER Figure 2

APPENDIX A
No Longer Contained-In Determination Directive

Internal Management Directive

Conducting Contained-In Determinations For Environmental Media

State of Oregon
Department of
Environmental
Quality

Hazardous Waste
Program
811 SW 6th Avenue
Portland, OR 97204
Phone: (503) 229-5696
(800) 452-4011
Fax: (503) 229-6762
Contact: Dave LeBrun
www.oregon.gov/DEQ

DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

Alternative formats (Braille, large type) of this document can be made available.
Contact DEQ's Portland office, at (503) 229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696.

Disclaimer

This directive is intended solely as guidance for DEQ employees. It does not constitute rulemaking by the Environmental Quality Commission and may not be relied upon to create an enforceable right or benefit, substantive or procedural, enforceable at law or in equity, by any person. With written managerial approval, DEQ employees may deviate from this directive. DEQ anticipates revising this directive from time to time as conditions warrant.

Document Development

Prepared By:	Dave LeBrun and Dan Lobato		
Reviewed By:	Jay Collins, Rich Duval, Hazardous Waste PMT		
Reviewed By:	Dana Bayuk, Katie Robertson, Don Hanson, Cleanup PMT		
Approved By:		Date:	2-13-15

Table of Contents

1. Intent/Purpose/Statement of Need
2. Applicability
3. Summary
4. Background
5. Definitions
6. List of acronymns used in this Internal Management Directive
7. Directive
8. Appendices
    - Appendix A - Contained-In Determination Approval Example Memo
    - Appendix B – Contained-In Example Scenarios
9. Record of Revisions to Internal Management Directive

1. Intent/Purpose/Statement of Need

In an effort to encourage remediation at contaminated cleanup sites, the U.S. Environmental Protection Agency developed a series of regulations and policies for situations involving hazardous waste in environmental media (e.g., soil, sediment, water). Examples of such regulations and policies include the Area of Contamination (AOC) policy, the contained-in policy, the regulations for Corrective Action Management Units (CAMU's), and temporary units.[1]

Importantly, EPA determined contaminated environmental media are not considered solid wastes in the sense of being abandoned, recycled or inherently waste-like as defined in the Resource Conservation and Recovery Act (RCRA) regulations. However, environmental media containing listed hazardous wastes or exhibiting a hazardous waste characteristic must be managed as hazardous waste because, and only as long as, they contain listed wastes or exhibit a hazardous waste characteristic.

This Contained-in Determination Internal Management Directive (IMD) is intended to clarify DEQ's application of RCRA hazardous waste regulations to contaminated environmental media for the purpose of determining whether or not media contain hazardous waste.

EPA regions and authorized states may apply the contained-in policy to determine site-, media- and contaminant-specific levels, such that if the concentration of the hazardous constituents in the environmental media fall below these levels, the environmental media may be determined to no longer contain hazardous waste. The "Contained-in Determination" is based on the environmental media contaminated and may be made before or after treatment of the contaminated media occurs. However, treatment of the media is not a requisite for conducting "contained-in determinations."

EPA has not issued any definitive guidance or regulations for determining appropriate contained-in levels; however, EPA regions and states have been advised that conservative, health-based levels derived from direct-exposure pathways would clearly be acceptable as "contained-in" levels. Historically, the practice of EPA and many states has been to specify conservative, risk-based levels calculated with standard conservative exposure assumptions, and/-or use site-specific risk assessments.

Once DEQ makes a determination the environmental media no longer contains a hazardous waste, RCRA does not generally pose a barrier to decision making at the site. Permitting requirements and Minimum Technology Requirements (MTR's) do not apply to media that does not contain hazardous waste. Other requirements related to management of the environmental media as Oregon solid waste may apply.

[1] 61 FR 18780, 18782 (April 29, 1996), memorandum from Michael Shapiro, Director, Office of Solid Waste, Stephan D. Luftig, Director, Office of Emergency and Remedial Response, and Jerry Clifford, Director, Office of Site Remediation Enforcement, EPA to RCRA Branch Chiefs and CERCLA Regional Managers, (March 13, 1996); 55 FR 8666, 8758-8760 (March 8, 1990); and 58 FR 8658 (February 16, 1993).

2. Applicability

DEQ RCRA and Cleanup staff will use this IMD when evaluating whether contaminated environmental media contains a hazardous waste. Sites which may generate contaminated environmental media include, but are not limited to:

- RCRA generators that have had releases to the environment;
- Environmental cleanup sites under DEQ oversight;
- Emergency Response cleanup sites;
- RCRA corrective action sites; and
- Anyone wishing to dispose of wastes in Oregon, such as out-of-state RCRA generators, environmental cleanup sites or RCRA corrective action sites.

This IMD does not address contaminated debris. Examples of contaminated debris include, but are not limited to: Manufactured objects, plant or animal matter, and natural geologic material. Traditionally, the same contained-in policy for environmental media governed hazardous waste-contaminated debris. In 1992, EPA codified certain aspects of the contained-in policy for debris in the definition of hazardous waste regulations in §261.3(f). In particular, EPA included a regulatory passage explaining the process by which handlers of debris contaminated with listed hazardous waste can demonstrate the debris is non-hazardous. This passage also references certain treatment technologies for decontaminating listed debris so it no longer contains a listed waste. This IMD recommends that Cleanup staff consult with DEQ RCRA staff for assistance with contaminated debris.

This IMD also does not apply to wastestreams generated during normal industrial or manufacturing operations (i.e., "as-generated" wastes), such as:

- Concentrated spent chemicals;
- Discarded, unused commercial chemical products and formulations;
- Industrial wastewaters; and
- Pollution control/treatment residues such as sludges.

3. Summary

DEQ staff will use this IMD to determine whether contaminated environmental media contains hazardous waste. For each individual case, DEQ will consider contaminated environmental media to no longer contain hazardous waste when: 1) They no longer exhibit a characteristic of hazardous waste; and 2) concentrations of hazardous constituents from listed hazardous waste are below Risk Based Concentration levels approved by DEQ in this IMD.

DEQ Cleanup Project managers will consult with Hazardous Waste program staff on contained-in determinations by routing a memo (Appendix A) to the regional Hazardous Waste program through the appropriate Hazardous Waste staff person and their manager. Hazardous Waste staff will consider Land Disposal Restriction issues and will coordinate with the Cleanup Project Manager that routed the memo. Once approved by Hazardous Waste staff, the memo will be routed to both the appropriate Cleanup and Hazardous Waste managers for signature and approval.

The Responsible Party must act in compliance with conditions prescribed in the approval memo for managing contaminated media as non-hazardous material . In situations involving long-term disposal and or disposal of large volumes material, Cleanup and Hazardous Waste staff and the RP should consult with the solid waste permit manager to make sure that the solid waste landfill being considered for disposal of the environmental media has sufficient capacity and is approved to accept the environmental media either as an authorized waste or through a special waste management plan and to ensure that the terms of the contained-in determination are met in full. In the event environmental media contains hazardous waste, the RP will manage the material consistent with Oregon state hazardous waste regulations.

4. Background

EPA's contained-in policy is not codified in rule, however, it is a longstanding policy for applying RCRA Subtitle C requirements to mixtures of environmental media (e.g., soils, groundwater, sediments) and hazardous wastes. Two rules subject environmental media to Subtitle C requirements. Under 40 CFR 261.3(c)(1) a "hazardous waste will remain a hazardous waste" unless and until certain specified events occur. Under 40 CFR 261.3(d)(2) a "waste which contains" a listed hazardous waste remains a listed waste until it is delisted. Together these regulations provide for continued regulation of hazardous wastes even after they are released to the environment and mingled with media.

The contained-in concept has been discussed in several Agency directives and in several RCRA rulemakings. 58 FR 48092, 48127 (September 14, 1993). In addition, EPA has explained the policy and its regulatory basis in numerous preambles and letters, including 53 FR 31138, 31142, 31148 (August 17, 1988); 57 FR 21450, 21453 (May 20, 1992); memorandum from Marcia E. Williams, Director, EPA Office of Solid Waste to Patrick Tobin, EPA Region IV (Nov 15, 1986); letter from Jonathan Z. Cannon, EPA Acting Assistant Administrator, Office of Solid Waste and Emergency Response, to Thomas Jorling, Commissioner, New York Department of Environmental Conservation (June 19, 1989); letter from Sylvia K. Lowrance, Director, EPA Office of Solid Waste, to John Ely, Enforcement Director, Virginia Department of Waste Management (March 26, 1991); and a detailed discussion in HWIR-Media proposal preamble, 61 FR 18795 (April 29, 1996).

In addition, EPA provides a description of the policy in *Management of Remediation Waste Under RCRA*, EC-G-2002-096, which can be found at:
http://www.epa.gov/waste/hazard/correctiveaction/resources/guidance/remwaste/pspd_mem.pdf

5. Definitions

Administratively Complete: This definition refers to the Responsible Party's formal request. The request must have the following information: Requester's name and address; Site Name, location and ECSI and/or Generator number, if issued, a list of applicable waste codes, and sufficient test results to support a determination.

Area of Contamination Policy: In what is typically referred to as the area of contamination (AOC) policy, EPA interprets RCRA to allow certain discrete areas of generally dispersed contamination to be considered RCRA units (usually landfills). Because an AOC is equated to a RCRA land-based unit, consolidation and *in situ* treatment of hazardous waste within the AOC does not create a new point of hazardous waste generation for purposes of RCRA. This interpretation allows wastes to be consolidated or treated *in situ* within an AOC without triggering land disposal restrictions or minimum technology requirements. The AOC interpretation may be applied to any hazardous remediation waste (including non-media wastes) that is in or on the land. Note that the AOC policy only covers consolidation and other in situ waste management techniques carried out within an AOC. For *ex situ* waste management or transfer of wastes from one area of contamination to another, see discussion of corrective action management units, below. The AOC policy was first articulated in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). See 53 FR 51444 for detailed discussion in proposed NCP preamble; 55 FR 8758-8760, March 8, 1990 for final NCP preamble discussion. See also, most recent EPA guidance, March 13, 1996 EPA memo, "Use of the Area of Contamination Concept During RCRA Cleanups."

Corrective Action Management Units (CAMUs): The corrective action management unit rule created a new type of RCRA unit – a Corrective Action Management Unit or CAMU -- specifically intended for treatment, storage and disposal of hazardous remediation waste. Under the CAMU rule, EPA and authorized states may develop and impose site-specific design, operating, closure and post-closure requirements for CAMUs in lieu of Minimum Technology Requirements (MTRs) for land-based units. Although there is a strong preference for use of CAMUs to facilitate treatment, remediation waste placed in approved CAMUs does not have to meet LDR treatment standards. The main differences between CAMUs and the AOC policy (discussed above) are that, when a CAMU is used, waste may be treated *ex situ* and then placed in a CAMU, CAMUs may be located in uncontaminated areas at a facility, and wastes may be consolidated into CAMUs from areas that are not contiguously contaminated. None of these activities are allowed under the AOC policy, which, as discussed above, covers only consolidation and *in situ* management techniques carried out within an AOC.

Environmental Media: Soil, sediment, and water in the environment (surface water, stormwater, groundwater).

Debris: Solid material exceeding a 60 mm particle size that is intended for disposal and that is: a manufactured object; or plant or animal matter; or natural geologic material. However, the following materials are not debris: any material for which a specific treatment standard is provided in Subpart D, Part 268, namely: lead acid batteries, cadmium batteries and radioactive lead solids; process residuals such as smelter slag and residues from the treatment of waste, wastewater, sludges, or air emission residues; and intact containers of hazardous waste that are not ruptured and that retain at least 75% of their original volume. A mixture of debris that has not been treated to the standards provided by §268.45 and other material is subject to regulation as debris if the mixture is comprised primarily of debris by volume, based on visual inspection.

6. Acronyms Used in This Directive

AOC – Area of Contamination

CAMU – Corrective Action Management Units

CERCLA - Comprehensive Environmental Response Compensation and Liability Act

CWA – Clean Water Act

DEQ – Department of Environmental Quality

EPA – Environmental Protection Agency

ECSI - Environmental Cleanup Site Information

IMD – Internal Management Directive

LDR - Land Disposal Restriction

MTR – Minimum Technology Requirements

QAPP – Quality Assurance Project Plan

POTW – Publicly Owned Treatment Works

SAP – Sampling and Analysis Plan

RBC - Risk Based Concentration

RCRA - Resource Conservation and Recovery Act

RP – Responsible Party

WWTP – Waste Water Treatment Plant

7. Directive

7.1 Applicability: This IMD applies only to environmental media (soil, sediment and water). Hazardous waste contaminated debris management can be found under 40 CFR 261.3(f)(2) and 40 CFR 268.45(a).

7.2 Steps for making the No-longer Contains Determination:

7.2.1. A formal request for a no-longer contains determination must be received by DEQ to initiate the process. Initial review by DEQ staff should verify that:

1. Cleanup sites are under current DEQ oversight. This would include the site being a current participant in one of the following programs: Voluntary Cleanup Program, Independent Cleanup Pathway, Site Response Program, Orphan Program or Dry Cleaner Program.
2. Independent Cleanup sites not in one of the programs listed in 7.2.1.1 that come to the Department to request a No-longer Contains Determination must volunteer for or be willing to enter a cost recovery program for the determination process contained in this IMD or join one of the programs.
3. A contained-in request from a RCRA hazardous waste generator performing a cleanup or correrctive action will use the RCRA generator compliance cost centers.
4. The request contains sufficient analytical information to demonstrate that the environmental media no longer contains a hazardous waste because any listed hazardous waste has been treated and is below health and environmental risk based values or is not characteristic. Sample results are representative of the media as determined by DEQ-approved media characterization plan using accepted established protocols (SW-846) or through site sampling conducted per DEQ-approved SAP/QAPP.
5. The request is administratively complete. The request should include the Requester's name and address; Site Name, location and ECSI and/ or Generator number, if issued; a list of applicable waste codes; site history and background; and sufficient test results to support a determination.
6. If a site has both an ECSI and a hazardous waste generator number both should be noted on the memo so that both programs can track through their respective systems and file the completed results in the appropriate facility or location files.

7.2.2. Subsequent to confirming that the criteria for Section 7.2.1 have been met, DEQ completion of the contained-in determination will include determining whether the environmental media: 1) contains a listed hazardous waste below risk based levels, or 2) exhibits a characteristic of hazardous waste (i.e., toxicity, ignitability, corrosivity, or reactivity). To accomplish No. 1), DEQ staff (typically HW staff, in coordination with Cleanup staff) should use the current DEQ Risk Based Concentrations for Individual Chemicals found at: http://www.deq.state.or.us/lq/pubs/docs/RBDMTable.pdf, as health-based levels for comparison with hazardous constituent levels in

water and soil. Water that contains concentrations of hazardous contaminants lower than the construction & excavation worker levels under the "Groundwater in Excavation" heading and soil that contains concentrations of hazardous constituents lower than the occupational levels under the "Soil Ingestion, Dermal Contact and Inhalation" heading will be determined to not contain hazardous waste.

In the case of media that exhibit a characteristic of hazardous waste, the media are considered to "contain" hazardous waste for as long as they exhibit a characteristic. Once the characteristic is eliminated (e.g., through treatment), the media are no longer considered to "contain" hazardous waste. Since this determination can be made through relatively straightforward analytical testing, no formal "contained-in" determination by DEQ is required. (Note: If the media is characteristic before treatment, then LDRs would be applicable.)

7.2.3. LDR considerations: LDRs are applicable and must be met in two situations:

1. If the waste is generated (removed from the land or AOC) prior to the contained-in determination and the media has been contaminated by a listed hazardous waste, LDRs would apply; and,
2. If the waste is a hazardous waste and has to be treated to meet the RBCs.

In the event that LDRs are applicable and must be met, use the alternative LDR treatment standards for contaminated soil found in 40 CFR 268.49.

Please note that contaminated environmental media determined not to contain <u>any</u> (chemical analytical results are non-detect) waste (i.e., it is just media, it does not contain solid or hazardous waste) would not be subject to any RCRA Subtitle C requirements, including the LDRs, regardless of the time of the "contained-in" determination and as such the RP would not need to consult with the Department.

7.2.4. Disposal Restrictions: Environmental media subject to a contained-in determination that concludes the material no longer contains a hazardous waste, although not a hazardous waste may still be considered a solid waste with concentrations of contaminants that may pose a threat. Therefore, additional non-HW restrictions on re-use, placement, or disposal may apply as outlined in Section 7.3. DEQ's contained-in determination approval should require soil to be managed at a Subtitle D landfill and water to be disposed of at a Clean Water Act (CWA) permitted wastewater treatment system. Deviation from these requirements should be evaluated on a case-by-case basis. Because the RBC levels used to determine that the environmental media no longer contains a hazardous waste are based on occupational values, case specific evaluations should make sure that the media is not used beneficially where residential exposures may occur.

7.3 <u>Documenting the Approval:</u> The Cleanup Project Manager will provide the Hazardous Waste program with an approval memo and cover sheet (See approval

memo Appendix A). The cover sheet will include the site name, the media involved, the approved disposal and then signature lines for the Hazardous Waste staff who reviews the request and the Hazardous Waste and Cleanup Program managers who will provide review and final approval.

The Hazardous Waste Manager of the Hazardous Waste staff person reviewing the memo has 5 business days to review and sign the memo once it has been routed to them. If they have not reviewed and signed the memo within this time frame, the Hazardous Waste staff will sign the memo on their behalf and return the memo to the Cleanup Project Manager unless they specifically request an extension.

The body of the memo should include; a brief description of site background; a discussion of why the contained-in determination was needed; analytical results listed in a table; a discussion of the data review; and a paragraph describing limitations and DEQ's conclusions. Also in the body of the memo will be the requirements for re-use, placement, and disposal of soil and/or water indicated in Section 7.2.4, and a list of supporting documents, including the No Longer Contained-In Determination submitted by the RP, if applicable.

This memo is the basis to support non-hazardous disposal options prescribed in the approval memo, including soil managed at a Subtitle D landfill and water disposed of at a WWTP. Disposal alternatives that DEQ may consider based on site-specific considerations include using material as "clean fill" if the soil meets DEQ clean fill criteria, or placing media back into the on-site excavation(s) with the approval of DEQ's Cleanup Program. The environmental media may also be evaluated for a beneficial use under OAR 340-093-0260 through OAR 340-093-0290.

Once the memo is approved and signed, a copy should be placed in both the hazardous waste and cleanup files for future reference.

8. Appendices

Appendix A - Contained-In Determination Approval Example Memo

Appendix B – Contained-In Example Scenarios

Appendix A - Contained-In Determination Approval Example Memo

State of Oregon
Department of Environmental Quality Memorandum

To: Project File, ZY Mobility, ECSI 1234 **Date:** 2/10/2015

From: Joe Brown, WR Cleanup Program

Through: Bob Neff, Haz Waste Compliance

Approved: Dave Smith, WR Hazardous Waste Program Manager

Subject: No Longer Contained-In Determination
ZY Mobility Site
Medford, Oregon (ECSI 1234)

The DEQ's Western Region Environmental Cleanup and Hazardous Waste Programs have prepared this No Longer Contained-In Determination for soil cuttings and groundwater investigation derived waste (IDW) and soil generated during a sanitary sewer line replacement project at the ZY Mobility cleanup site. ZY Mobility provides vehicle retrofitting services for people with disabilities and has been in operation in Medford since 1982. Prior to this, the site was occupied by a dry cleaning facility between 1950 and 1981. Releases of Perchloroethylene (PCE) from past dry cleaning practices have contaminated soil and groundwater beneath the site. PCE contamination in environmental media from this site would be considered by DEQ to contain a listed hazardous waste (F002).

This determination is for approximately 8 cubic yards of soil that was excavated in August 2014 during replacement of the facilities onsite sanitary sewer line and for 26 drums (6.5 cubic yards) of soil and 17 drums of water (approximately 935 gallons) generated in September and December 2014 during drilling of soil borings and monitoring wells on the site. The 8 cubic yard soil pile generated from the sanitary sewer excavation is currently covered and stored on the property. The IDW generated during drilling activities is currently stored on site in labeled drums. All of the soil and water are and have been stored in the area of contamination on the site.

Representative samples were collected from the soil pile (soil pile), the drummed IDW soil and the drummed IDW water. Soil analysis was conducted as "totals", not TCLP. Low levels of PCE were detected in the soil pile, the IDW soil and the IDW water samples. The results of the chemical analysis are tabulated below. Only chemicals detected by chemical analysis are shown in the table.

Media	PCE Concentration	PCE RBC Soil Direct Contact (ppm)	PCE RBC Soil Leaching to Groundwater (ppm)	PCE RBC Water (ppb)	20 x TCLP Limit PCE for Soil (ppm)
Soil Pile	0.0004 ppm	940	Occupational: 3.7 Residential: 0.64	Not Applicable	14
IDW Soil	0.00042 ppm	940	Occupational: 3.7 Residential: 0.64	Not applicable	14
IDW Water	0.89 ppb	Not Applicable	Not Applicable	5400	Not Applicable

A No Longer Contained-In Determination is needed to show that the soil and water are not characteristic hazardous waste; and that concentrations of dry cleaning solvent related chemicals are below protective levels, and if applicable, Land Disposal Requirements (LDRs).

To demonstrate that the soil no longer "contains" hazardous waste, the following conditions need to be met:

1. The soil (a solid) must not exhibit a characteristic of hazardous waste (must not be reactive or toxic). The potential for soil containing a waste to exhibit the toxicity characteristic is evaluated through comparison of constituent concentrations in leachate, extracted from the waste, using the Toxicity Characteristic Leaching Procedure (TCLP), with the limits specified at Title 40, Part 261.24 of the Code of Federal Regulations (40 CFR 261.24). Representative (total) chemical concentrations for the soil are compared to a value of 20 times the TCLP limit (to account for the 20 to 1 dilution inherent in the TCLP analysis method) to determine if the limits could potentially be exceeded. If the 20 times TCLP limit for any chemical is exceeded, then the waste may be a characteristic waste. The 20 times TCLP limit for PCE is 14 part per million (ppm) or 14,000 part per billion (ppb). The soil does not fail the toxicity characteristic for PCE. The soil is not a characteristic hazardous waste.
2. The water must not exhibit a characteristic of a hazardous waste (must not be ignitable or corrosive). Based on knowledge of process, DEQ has determined that the water is neither ignitable nor corrosive.
3. Concentrations of hazardous constituents from listed waste must be below health-based levels. Currently it is DEQ policy that if soil is to be taken to a lined Subtitle D facility then concentrations of hazardous constituents should be below the DEQ "Occupational" Risk Based Concentration (RBC) for direct contact. Currently this RBC for PCE is 940 ppm. The concentrations of PCE detected in the soil pile and the IDW soil are well below the occupational direct contact RBC. The concentrations of PCE are also significantly below the residential and occupational leaching to groundwater RBCs 0.64 ppm and 3.70 ppm, respectively, indicating the soil is a good candidate for disposal at a regulated construction and demolition landfill.
4. For water, DEQ's current policy is that if the water is to be taken to a Clean Water Action (CWA) permitted wastewater treatment facility then concentrations of hazardous constituents should be below the "Groundwater in and Excavation" RBC. Currently this RBC for PCE is 5,400 ppb. The concentration of PCE in the IDW water is well below this RBC.
5. RCRA Land Disposal Restrictions do not apply because the waste was not removed from the Area of Contamination prior to this determination.

The table above illustrates the sample results compared to the applicable DEQ RBCs and TCLP.

Underlying constituents of PCE might be present in the soil at concentrations below the minimum reporting levels (MRLs) shown in the laboratory data. Using the MRL concentrations and our knowledge of process, we can assume the following about the soil and water:

- It would not be ignitable, corrosive nor reactive;
- Concentrations of underlying constituents would be below Toxicity Characteristic levels;
- Concentrations of underlying constituents would be below DEQ protective levels (Occupational RBCs);

Based on our review of the data and the above findings, DEQ has determined that the soil pile from the excavated sewer line and the soil and groundwater IDW generated during drilling and sampling activities at the ZY Mobility site do not exhibit characteristics of a hazardous waste. The concentrations of detected dry cleaner solvents in the water and soil samples are below the DEQ's generic occupational risk based standards. The soil does not contain hazardous waste or pose an unacceptable risk under an occupational scenario. The soil should be disposed of at a permitted solid waste or construction and demolition landfill. The water should be disposed on-site in the publicly owned treatment works (POTW) or taken to another CWA permitted wastewater treatment facility.

Appendix B
Example Scenarios: Conducting Contained-In Determinations

Scenario #1: Contaminated soil excavated from a Cleanup site will be managed at a Subtitle D landfill

A cleanup site at a former dry cleaners is under DEQ oversight in the Voluntary Cleanup Program (VCP). As part of the cleanup, the responsible party excavated 200 tons of soil contaminated with tetrachloroethylene (PCE), which is determined to be an F-002 listed hazardous waste. The soil was stockpiled temporarily on the site and representative soil samples were collected to characterize the levels of contamination in the pile. The consultant for the site submitted a request to DEQ for a No Longer Contained-In Determination for the soil. Soil sample results indicated the soil contained up to 8,000 µg/Kg (8 mg/Kg) PCE. The DEQ Project Manager first determined that the soil was not a characteristic hazardous waste because the total PCE concentration is less than 20 times the TCLP criterion of 0.7 mg/L **OR** because analysis of the samples using the TCLP did not exceed PCE criterion of 0.5 mg/L. The DEQ Project Manager compared the PCE results to the occupationalworker RBC to evaluate whether the material contained a listed hazardous waste. The concentrations of PCE in the soil were well below the applicable RBC. The Project Manager also determined that the LDRs were not applicable in this case because the soil has been managed on-site in the area of contamination (the point of generation is when the soil leaves the AOC). Because the levels of contamination in the soil are below the applicable RBC and the material did not exhibit a hazardous waste characteristic, DEQ approved disposal of the soil at a Subtitle D Landfill.

Scenario #2: IDW consisting of 4 drums of water will be managed at a wastewater treatment facility

At the dry cleaner site in Scenario #1, four drums investigation derived waste (IDW) water were collected during the installation and sampling of monitoring wells. A representative sample of the water found it contained PCE at 200 µg/L, making it an F-listed waste. The DEQ Project Manager knew that disposal to the POTW on site was not an option; therefore off-site disposal at a licensed waste treatment facility was selected as the next best disposal option. The concentration of PCE in the water was well below the Occupational Inhalation and Ingestion RBC. Because the levels of contamination in the water were below the applicable RBC, DEQ approved transport and disposal of the wastewater at a licensed treatment facility in Portland.

9. Record of Revisions to IMD

Revision	Date	Changes	Editor

APPENDIX B
No Longer Contained-In Determination Example

State of Oregon
Department of Environmental Quality **Memorandum**

Date: 17-January-2018

To: Dan Lobato – DEQ, Eugene
Don Hanson – DEQ, Eugene
Brian Fuller – DEQ, Eugene

From: Eric Clough – DEQ, Coos Bay

Subject: No Longer Contained-In Determination

The DEQ's Western Region Environmental Cleanup and Hazardous Waste Programs have prepared this No Longer Contained-In Determination for excavated soil generated during a small remedial excavation at the Rogge Planar Facility North (ECSI #6048). The Rogge Planar Facility is a historic lumber mill property along the lower reach of the south bank of the Coquille River near Bandon. Pentachlorophenol (PCP) from past lumber mill operations have contaminated soil. PCP contamination in environmental media from this site would be considered by DEQ to contain a listed hazardous waste (F032). Due to the small volume of soil, low concentration of contaminants and high cost of hauling and disposal, the RP (JGE Properties, LLC) has requested DEQ reach a determination that would allow the soil to be disposed of at a class D landfill rather than a class C landfill (Arlington).

This determination is for approximately 8 cubic yards of soil that was excavated in July 2016. The excavated material was originally sampled in March 2016 during site assessment activities. The PCP concentration of that sample was reported as 1.9 parts per million (PPM) by 8270D-SIM. This has been the highest concentration found anywhere at the site. The 8 cubic yard soil pile generated from the excavation has been stockpiled, uncovered and on-site since that time (see photo). Five confirmation samples were collected from the limits of the shallow excavation and also analyzed by 8270D-SIM. All confirmation sample results are reported as non-detect with a reportable detection limit between 0.110 and 0.160 parts per million.

The generic risk-based screening level for occupational exposure pentachlorophenol in soil is 4.0ppm. The construction worker screening level is 34ppm and the excavation worker screening level for soil is 960ppm.

A No Longer Contained-In Determination is needed to show that the soil is not characteristic hazardous waste; and that concentrations of PCP are below unacceptable levels, and if applicable, Land Disposal Requirements (LDRs).

Based on our review of the data DEQ has determined that the soil pile from the excavated area adjacent to the former paint shed portion of the mill building does not exhibit characteristics of a hazardous waste. The concentrations of detected contaminants in soil samples are below the DEQ's generic occupational risk based standards. In fact, the only semi-volatile compound detected in the sample of the material to be disposed is PCP. All other SVOC's were non-detect. The five confirmation samples collected from the limits of the small remedial excavation are reported as non-detect for all SVOC constituents.

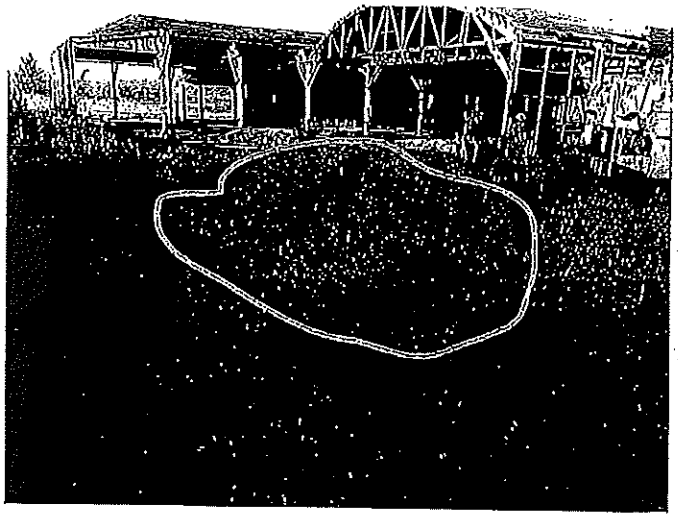
The soil does not contain hazardous waste or pose an unacceptable risk under occupational or excavation/construction worker exposure scenarios, as shown by the data table below. The soil should be disposed of at a Class D permitted solid waste landfill. Once the material is disposed of in accordance with this determination, please send copies of the disposal receipts to the Project Manager (Eric Clough, DEQ Coos Bay office). Be advised that the contaminated soil excavated in July 2016 and described above, remains a listed hazardous waste until all conditions of this determination are met.

Data Table

	PCP mg/kg	Total TCDD TEQ mg/kg	Naphthalene mg/kg	
TP-4 (Mar 2016) mg/kg	1.9	---	ND	
Confirmation Samples (five, July 2016)	ND	---	0.0074	
Composition Sample (March 2017)	---	8.0E-06	---	
Site Maximum	1.9	2.8E-05	0.030	
Occupational RBSL	4	1.6E-05	23	
Construction RBSL	34	1.7E-04	580	
Excavation RBSL	960	4.8E-03	16,000	
LDRs (?)	7.4			

--- = not analyzed

Former Paint Shed Area Soil Pile



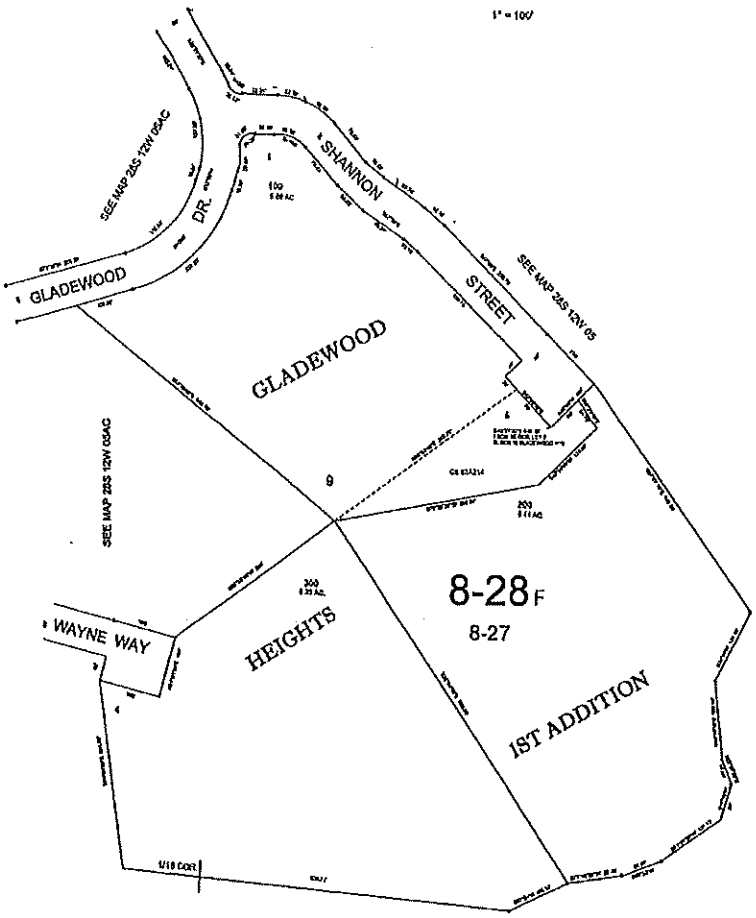
THIS MAP WAS PREPARED FOR ASSESSMENT PURPOSE ONLY

SE1/4 NE1/4 SEC. 5 T28S R12W W.M.
COOS COUNTY

1" = 100'

28S 12W 05AD

CANCELLED NO.
201



03-21-2013

28S 12W 05AD

CULTURAL RESOURCE INVENTORY

Findings: (+), *historic site: Bullards Ferry South Landing, MT -2023-1*
County: Coos
Township: 28 South
Range: 14 West
Section: 17
USGS 7.5' Bandon (1970)
Project Type: Pedestrian & Subsurface Survey & Cultural Resources Inventory
Acres: 25
Agency ID: MT-2023.01

Cultural Resource Inventory of the Rogge Mill Property Bandon, Oregon

By

Mark Axel Tveskov

A report to

Ying Deng, OutdoorSuperstar, LLC
P.O. Box 1345 Springfield, Oregon 97477

13 February 2023

Report MT.2023-01

Black Dog Archaeology, LLC
945 Park Avenue
Medford, Oregon 97501

The Rogge Mill property is comprised mostly of a mass of later 20th century industrial debris deposited on the inter-tidal mudflats of the lower Coquille River estuary just north of the city of Bandon in Coos County, Oregon. OutdoorSuperstar LLC contracted Black Dog Archaeology LLC to create a cultural resources inventory of the property and to assess its archaeological potential considering proposed development. The Rogge Mill property as surveyed comprises ~25 acres in Section 17, Township 28 South, Range 14 West of Coos County, 7.5' USGS Bandon quadrangle 1970 (Figure 1 and Figure 2). As discussed in more detail below, most of the landform of the Rogge Mill property is an artificial construction, the remains of fill torn from the bluff on the south side of the property that was used to create a platform covering the estuarine mudflats upon which industrial buildings were placed, and most of this construction occurred in the 1950s and afterward. The property, however, is near to a constellation of archaeological sites that includes 35CS1, 35CS2/3, 35CS130, and 35CS158 as inventoried by the Oregon State Historic Preservation Office (SHPO; see below). These sites include lithic scatters, shell midden deposits, and house remains all of Indigenous Coquille manufacture and use, and also include extensive deposits of wood stake fish weirs and traps found on and within the mudflat sediments just across the river and downstream from the Rogge Mill property. These same kinds of mudflat sediments are found beneath the artificial platform upon which the Rogge Mill complex was constructed. Additionally, the Coquille Tribe is concerned about additional cultural sites that are potentially found near or within the property (Bridgett Wheeler, personal communication, and email correspondence Mark Axel Tveskov, 6 December 2022 and 4 January 2023).

Fieldwork was conducted on 6 January 2023, by Mark Axel Tveskov, who was accompanied by Gabrielle Bratt, Cultural Resources Technician for the Coquille Indian Tribe, and again on 13 & 14 January 2023 by Tveskov accompanied by Anne Wolke, Esq. This survey covered the area along the river side on the artificial platform upon which the industrial buildings once stood as well as the areas on the top of the bluffs to the south and east that are also part of the property owned by Outdoorsuperstar, LLC. A series of 13 individual 30 cm diameter shovel probes set at ~20-meter intervals were excavated on the bluff along the eastern edge of the property where the ground appeared to be relatively intact and where vegetation made ground visibility poor. Much late 20th century detritus from the operation of the Rogge Mill remains across the property. I recorded a single cultural site, designated *MT-2023-01*: the remains of the south end of the Coquille River ferry that was in service up to 1954 when the current Highway 101 bridge was constructed. This site includes pilings and other wood foundation elements as well as a small concrete structure that are visible on the surface of the ground protruding out of the industrial fill along the northwest corner of the property. These remains correlate to portions of the old ferry landing that are visible in photographs of the site dating up to the 1970s (See below). This site is found in an area of the property that is slated for conservation as a wetland (see development plans in Appendix A below, also Ying Deng, personal communication to Mark Axel Tveskov, 6 January 2023). No other intact or significant archaeological materials were observed during this survey.

I do not believe that the proposed development of the property will have any adverse impact to any recorded or undiscovered cultural resources. However, the property is located immediately adjacent to one of the most significant concentrations of Indigenous cultural resources on the Oregon coast, and the artificial platform upon which the Rogge Mill industrial concern was constructed was placed on top of the same kind of estuarine sediments that contain the wood stake fish weirs and traps just across the river. If ground disturbing activities were to occur that would disturb these underlying mudflat/estuarine sediments, this activity should be monitored by a qualified archaeologist to prevent or mitigate damage to any intact cultural materials.

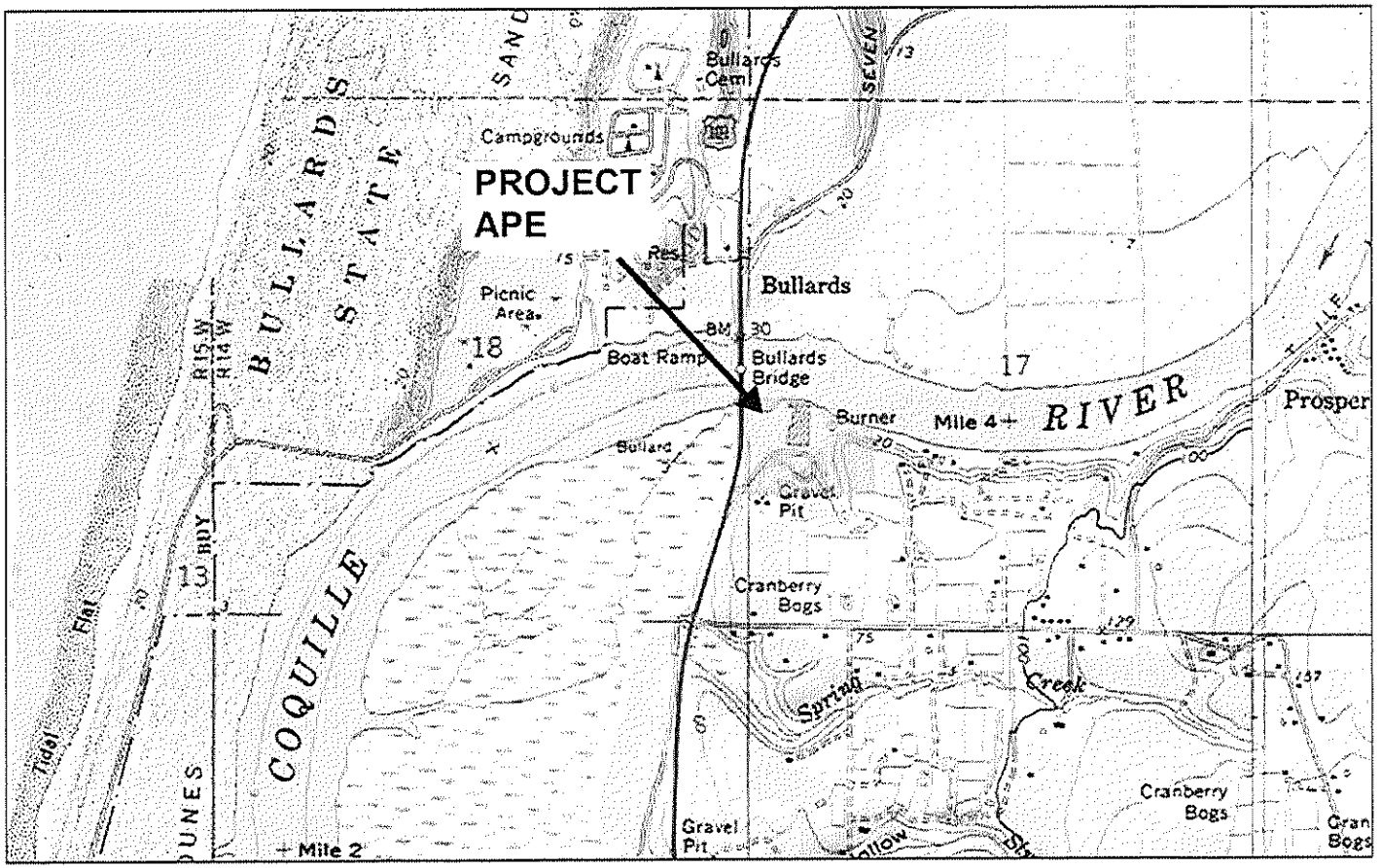


Figure 1. Location of the Rogge Mill project area.

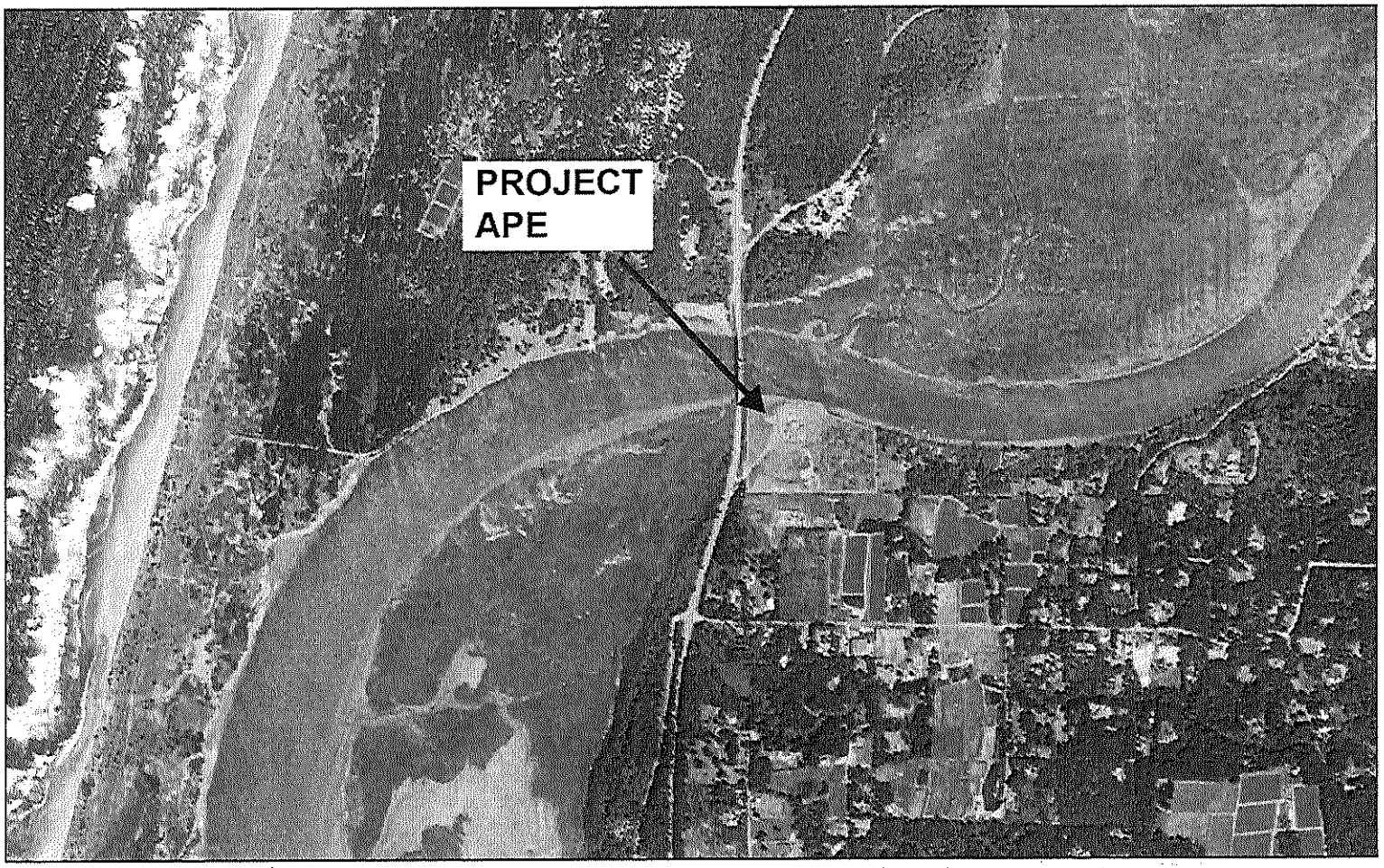


Figure 2. Aerial photo showing the location of the Rogge Mill project area.

Environmental Context.

The Rogge Mill property lies at the intersection of several valuable habitats, all rich in natural and cultural resources. Within ten kilometers west of the site lies an outer coast area that includes the rocky promontory of Coquille Point and its surrounding sandy beaches. Prior to the historic period, a large blue schist monolith known to the settlers as Tupper Rock, and to the contemporary Coquille Tribe as Grandmother Rock, lay at the mouth of the river, approximately one kilometer to the west. This monolith was destroyed by the federal government in the late nineteenth century, and the rubble was used to line the current jetty of the Coquille River mouth. These outer coast environments were home to variety of resources valuable to the cultural ecology of the Coquille people: shellfish species common in the outer coast environment include California mussel (*Mytilus californianus*), barnacles (*Balanus* sp.), black katey chitons (*Katharina tunicata*), piddock (*Penitella* sp.), among others. Sea mammals such as sea otters (*Enhydra lutris*), harbor seals (*Phoca vitulina*), California sea lions (*Zalophus californianus*), and whales (Cetacea) can be found near or on the outer coast, and many fish are available on a seasonal or year-round basis, including rock fish (*Sebastes* spp.), ling cod (*Ophidion elongates*), halibut (*Hippoglossus stenolepis*), surf smelt (*Hypomesus pretious*), herring (*Clupea harengus*), and others.

Figure 3. The lower Coquille River estuary viewed east from the Highway 101 bridge just northwest of the Rogge Mill project area on 6 January 2023/ The Coquille River spit is the landform in the background of the photograph, and the city of Bandon is in the background left.

The lower 10 kilometers of the Coquille River form a relatively small estuary with a broad floodplain, although the river is influenced by the tide as far as 60 km upstream. The tidally influenced part of the Coquille River is an extremely dynamic environment where the salt water, rich in marine nutrients, washes in twice a day to mix with detritus brought downstream by the river.

The estuary itself is flanked by intertidal mudflats and salt marshes–grassy islands of organic-rich marine and terrestrial sediment—and is intertwined with many smaller tidal channels. Estuaries, with their combination of river-borne sediments and fresh water and marine nutrients, are among the most biologically productive habitats on earth (McConnaughey and McConnaughey 1986:76; see also, Simenstad et al. 1997; Emmett et al. 1991). The Coquille estuary is no exception, and is home to numerous species of shellfish, fish, birds, and mammals. Blue mussel (*Mytilus edulis*), gaper clams (*Tresus nuttalli*), butter clams (*Saxidomus gigantens*), littleneck clams (*Protothaca staminea*), cockles (*Clinocardium nuttalli*) and dungeness crabs (*Cancer magister*) are the most common species of shellfish found in the Coquille estuary, although both bent nose clams (*Macoma nasuta*) and soft shell clams (*Mya arenaria*—a species introduced in the late 1800s from the east coast) are occasionally found as well.

The Coquille estuary hosts many species of anadromous and non-anadromous fish (Tveskov 2000a, 2000b). Chinook (*Oncorhynchus tshawytscha*) and coho salmon (*O. kisutch*) are the most abundant salmonid species in the Coquille estuary. Chinook salmon enter the estuary in the late summer and proceed upstream to spawn after the first major rains (usually in September). The coho salmon follow shortly thereafter, although they tend to travel further upstream to spawn than do the Chinook. Spring runs of either species are not significant, although the South Fork does have a spring run of Chinook (Ivy 1996, personal communication, Emmett et al. 1991). Steelhead salmon (*O. mykiss*) are also common in the Coquille River, and enter the estuary in the beginning of November and move upstream in late January and into February. Steelhead, which unlike the coho and Chinook do not die after spawning, move back down through the estuaries, and return to the Pacific Ocean around March. Although fewer in numbers than the coho, chinook, and steelhead, other salmonid species such as sea-run cutthroat trout (*O. clarki*) and chum salmon (*O. keta*) are also found in the Coquille estuary. Non-salmonid anadromous fish found in the area include green sturgeon (*Acipenser medirostris*), white sturgeon (*A. transmontanus*), and lamprey eels (*lampetra* sp.). Pacific herring (*Clupea harengus pallasi*) live in estuarine and marine habitats and enter the Coquille estuary in the late winter and early spring. Surf smelt (*Hypomesus pretiosus*) also move in and out of the Coquille estuary throughout the year. Resident fish species endemic to the region include diverse species of flatfish, sculpin, greenling, perch, and rockfish.

Birds are attracted to estuarine environments by the shellfish, schools of fish, and marsh vegetation. The Coquille estuary is home to a number of migratory and resident waterfowl: Canada geese (*Branta canadensis*) and ducks such as buffleheads (*Bucephala albeola*), mergansers (*Mergus* sp.), harlequin ducks (*Histronicus histronicus*), scoters (*Melanitta* sp.), mallards (*Anas platyrhynchos*), and pintails (*A. acuta*) are some of the most common migratory bird species found in the area, especially during the winter months. Other birds found in the region include great blue herons, grebes (Podicipedidae), cormorants (*Phalacrocorax* sp), sooty shearwaters (*Puffinus griseus*), (*Ardea herodias*), sea gulls (*Larus* sp.), and snowy egrets (*Leucophoyx thula*). Resident raptor species include bald eagles (*Haliaeetus leucocephalus*), ospreys (*Pandion haliaetus*), and redtail hawks (*Buteo jamaicensis*).

Further upstream, the river provides habitat for numerous freshwater species including shad (*Alosa sapidissima*), bass (chordate), trout (*Oncorhynchus* sp.), and lamprey eels (*Lampetra* sp.). Waterfowl such as tundra swan (*Cygnus columbianus*), Canada geese (*Branta canadensis*), and mallard ducks (*Anas platyrynchos*) pass through the Coquille estuary and river valley during their spring and fall migrations, and wading birds such as herons and egrets are often seen in the area. Furthermore, the Coquille River valley is home to many land mammals: deer (*Odocoileous* sp.), Roosevelt elk (*Cervus canadensis*), black bears (*Ursus americanus*), river otter (*Lutra canadensis*), beaver (*Castor canadensis*), and

raccoon (*Procyon lotor*). Taken together, and imbedded within a complex seasonal round of movements across the landscape, the Rogge Mill property would have been ideally situated to serve the needs of its inhabitants in terms of resource availability (Tveskov et al. 2017).

Cultural Background.

Pre-settler Context

The southern Oregon coast lies at the southernmost part of the Northwest Coast culture area. Until recently, less was appreciated about the Indigenous people of the Oregon coast than about the culture region in general. This was due to several factors, including the death of the majority of the region's Indigenous people as a result of the introduction of European diseases, and the subsequent removal of the remaining people to the Coast Reservation in 1856 (Tveskov 2007, 2000). Existing primary ethnographic documents came from a handful of interviews conducted by anthropologists on the reservation, years after removal (Harrington 1942; Barnett 1937; Drucker 1937; Sapir 1909, 1907). Fortunately, thanks to sustained research into local oral traditions and the archived field notes of earlier generations of ethnographers, we now have a much clearer picture of the cultures and societies of the region at European contact (Tveskov 2007, 2000; Byram 2002; Younker 2003; Wasson 2001; Hall 1995, 1991; and Ward 1986).

From the beginning of settler entry into the area, the specific cultural geography of the region's Indigenous people has been debated. Many times, including in many ethnohistoric documents, community names, language groups, and geographic place names are confused and used interchangeably (Tveskov 2007, 2002, 2000). Waterman (1921:12) discussed this very issue stating: "it is a positive fact that every group in this region has a series of names in their own tongue, for all the towns and other important places, in the territory of each of its own neighbors." Furthermore, the tendency among settlers is to attempt to define clear and exact boundaries for Indigenous linguistic, social, or cultural groupings, even if this does not represent reality. More accurately construed, the Indigenous people of southwest Oregon lived in a politically and demographically fluid landscape with few political, economic, demographic, or cultural boundaries.

The largest social division in southern Oregon Indigenous society was the "local group," a number of villages in a given area that saw themselves as autonomous from other local groups (Tveskov 2007, 2002, 2000; Tveskov and Cohen 2006). These local groups sometimes coincided with the distribution of language groups, but this was not always the case (Tveskov 2000). As recorded in ethnohistoric documents, the region around the Coquille River mouth and Coos Bay to the north was home to groups of people who spoke Hanis or Miluk (closely related Penutian languages) or an Athapaskan dialect. Most sources agree that Hanis was spoken around Coos Bay as well as to the north, and an Athapaskan dialect was spoken on the upper reaches of the Coquille River by a people who called themselves *Mishikwut'me-dunne* ("People living along the River Mishi"). Most of the ethnographic sources agree that the lower Coquille River area was inhabited by Indigenous people who spoke Miluk.

The Indigenous people living along the lower Coquille were known collectively as the Nasomah, which was the name of their local group (Parrish 1854:29). At least three communities appear to have been included in the Nasomah local group: *Mae'sh'tchae-dun*, on the south bank of the Coquille river, near its mouth; *K'ama'c dun*, located on the north bank of the river at present-day Bullards Beach State Park; and *Ni-les'-dun*, situated on the south bank of the river across from the *K'ama'c dun*. These communities were made up of individual households, comprised of related men

and their wives and families and ranged in size from small settlements with only one or two houses, to larger villages with many houses. The *Quatomah* were another local group that traditionally lived from south of Bandon to Port Orford, and their principal communities were along Flores Lake to just south of Bandon (Drucker 1937:271; Waterman 1921:364; Dorsey 1890:233; Parrish 1854:29).

Historical Context

Permanent Euro-American settlement of the Coquille River area began with the discovery of gold on the black sand beaches north of Bandon (Tveskov 2000; Beckham 1997). By 1853, Oregon's gold rush brought settlers the southern Oregon coast, who began mining the black sands at what is now known as Whiskey Run (Beckham 1997:10). That same year, Daniel Giles arrived on the lower Coquille River and began working at one of the first lumber mills, supplying the growing population of miners and those who were establishing homesteads. Giles described the surrounding area "the finest that I had ever seen. The entire country was fresh from the hands of nature, not a stick having been disturbed by the hand of the white man as there had been no improvements made, no settlers above the mouth of the river" (Giles [1854] in Wooldridge 1971:280-281).

The town of Randolph grew up just south of Whiskey Run, thriving until a large storm in 1854 buried the gold-bearing sediments under several feet of beach sand. At this point, mining activities shifted south to a tributary of the Coquille, and the town of Randolph was relocated. By 1859, a Randolph post office was established near the mouth of the Coquille River near Bullards Ferry (Vogel 1993:19). Early historian A.G. Walling described Randolph as having "a post office, a store or two, a brewery of very fair beer, and a small number of cosy [sic] residences, and contains perhaps 100 residents, whose chief occupation is lumbering and salmon catching" (Walling 1884:489). The Randolph post office would eventually be moved again to a few miles up Seven Mile Creek where Adam Pershbaker operated a store and sawmill (Beckham 1997:23). The post office was taken over by John Hamblock in 1863.

The search for gold continued to draw more and more people up the coastal rivers and streams, and the increased traffic prompted the establishment of a ferry at the mouth of the Coquille River. When Coos County was created by proclamation in 1853, one of its first acts was to license John Saunders to operate a toll ferry at the mouth of the river in the vicinity of modern-day Cleveland Avenue. Early travelers in the area described the crossing as the site of "about two hundred Indians" living in homes along "an irregular straggling course [reaching] from Wash Creek at the bottom of Prospect Hill to Ferry Creek (Bennett 1927:317). Establishing "Coquille Ferry" at the mouth of the river led to increased conflict between the Coquille people and the ever-encroaching white settlers.

The first Donation Land Claims in the vicinity of the modern town of Bandon were taken up by Thompson (aka Tommy) Lowe and Christopher Long in 1853 (Bennett 1927:328-329). Lowe chose the site of Bandon beach "not for the gold that glittered in front of it, for there was none, but because of a convenient place for a ferry, and from its admirable position for commercial purposes" (Bennett 1927:329). The Lowes built the first house near Bandon, and Christopher Long the second. Christopher Long also purchased 80 acres of land to the north in 1869. During these early years, only a ferry was located at the current Bandon town site, and the small population was dispersed along the farmlands a few miles upriver, where "on the opposite side were the ranches of John Hamblock, Edward Fahy, and the brothers Lowe" (Bennett 1927:341).

Like any burgeoning settlement, the fate of Bandon rested in the town's ability to get its many resources out to available markets. Its location at the mouth of the Coquille River made the

town an ideal spot to transport inland lumber and agricultural goods to regional, national, and even foreign markets. Jetty construction and harbor development were continuous throughout the late nineteenth to early twentieth century. A lighthouse erected at Rackleff Rock in 1896 was considered a major safety advance. These improvements allowed for considerable progress for freight and shipping into Bandon, and the town grew accordingly. Not surprisingly, the town grew up adjacent to its greatest resource: the harbor.

Sawmills were established across the region initially to serve miners, who needed milled lumber for sluices and flumes, and the homesteaders that followed who needed lumber for construction. As the region grew, so did the lumber industry. However, it was not until a distant disaster, the 1906 San Francisco earthquake, and its subsequent lumber boom, that the regional economy could be considered prosperous. One observer noted that in the first decade of the twentieth century "the river was lined with five sawmills and one or two shipyards" (Peterson and Powers 1977:112). In addition to lumber, other significant exports from the region by the turn of the century included: broom handles, coal, salted and canned salmon, match wood, livestock, potatoes, dairy products, fruit, and woolen goods (Beckham 1997:46).

Project Area Ethnographic, Archaeological, and Historical Background.

The Coquille River region is among the most archaeologically intensively examined regions on the Oregon coast. The first major archaeological investigations were conducted by Leatherman and Krieger (1940) at site 35CS3, an Indigenous community that is now encompassed by Bullards Beach State Park and located within one mile of the Rogge Mill project area. They excavated three plank houses, recovering three human burials and a rich assemblage of bone, chipped stone, and ground stone tools. In 1951, Lloyd Collins of the University of Oregon and local resident Huntley Alvey surveyed the Coquille River for archaeological sites, and recorded three sites in the Bullards Beach area: 35CS1 (the Philpott site), which included fish weirs, shell midden deposits, and a collection of tools eroding out of the river bank; 35CS2, a group of five housepits; and 35CS3, a shell midden deposit and at least three more housepits, again these are all located within one mile of the current project area. Collins also recorded sites 35CS19 and 35CS20 at this time and Richard Ross from Oregon State University reinvestigated 35CS3. Ross identified two components of the site: an upper, more recent component that contained shell midden, faunal remains, and historic artifacts, and an older component comprised of shell midden, faunal remains, and artifacts that dated to approximately 900 years B.P.

The Philpott site (35CS1, Draper 1988) is an archaeological site located along the lower Coquille that has been the subject of several investigations over the years. Richard Ross, John Draper, and Isaac Barner first worked there in 1978, identifying and recovering samples of shell midden, faunal remains, stone tools, and lithic debitage. They interpreted the site as a seasonal fishing camp used mainly in the summer. Several fish weir sites between the Philpott site and the Highway 101 Bridge were surveyed in the 1990s by Byram and Tveskov (Byram 2002; Tveskov 2000). The Osprey Weir site (35CS130) was mapped and excavated in 1994 and 1995 (Byram 2002; Tveskov 2000). At least 28 separate weir features were identified at this site, including nine lattice features, probably the remains of fish traps. These sites are located immediately opposite the Rogge Mill property on the mudflats and salt marshes on the north side of the Coquille River.

A large amount of archaeological work took place in conjunction with the restoration of the Ni-Les'Tun Unit of the Bandon Marsh National Wildlife Refuge (c.f. Tveskov and Cohen 2007). In 2011, the U.S. Fish and Wildlife Service (USFWS) completed the restoration of over 400 acres of

estuarine wetland that had previously been bermed off and controlled to create agricultural pastureland. Known as the Ni-Les'Tun Unit, this area is on the north side of the Coquille River approximately five kilometers upstream from the current project area. Among other archaeological projects, the archaeological mitigation and testing for the Ni-Les'Tun Unit included excavations at the Bussmann Site (35CS158) and the Blue Barn site (35CS61). Both of these sites included stratified shell midden deposits first deposited some 4,000 years ago, and both sites were occupied and reoccupied throughout the Late Holocene era (Tveskov and Cohen 2007). These sites, again, are located just north of the immediate Rogge Mill project area.

The Bandon Sandspit site (35CS5), located on sand spit inside the mouth of the Coquille River, was excavated by Luther Cressman from the University of Oregon in 1952. Although a very large and rich assemblage of artifacts, faunal remains, and architectural remains were uncovered, only two short articles briefly describing the sites were published (Cressman 1953). The assemblage recovered by Cressman in 1952 was reanalyzed by Tveskov (2000; see also Collins 1953) in the late 1990s. The site was interpreted to be the remains of a substantial village dating to the late prehistoric period, which was subsequently abandoned and reoccupied as a seasonal campsite in the protohistoric period. It was situated on the estuary bank and would have been a prime location to access a wide variety of resources.

The Old Town Bandon site (35CS43), located on the south bank of the mouth of the Coquille River near the town of Bandon, less than one mile from the 35CS115, has been the subject of much archaeological work. The majority of this work, which began in the 1970s and continued into the 2000s, has been conducted by Oregon State University (Hall 2001). OSU's research took place mostly south of 1st Street and included both research and salvage excavations: some work was conducted to test site boundaries or define natural and cultural strata at the site, whereas other work was conducted in response to the inadvertent discovery of human burials during construction or utility work by the City of Bandon. The analyses from this research has described a wide variety of artifacts manufactured from stone, bone, antler, and clay. Tveskov's work at this site began in the summer of 2001, when the city of Bandon dug a utility trench (2 x 2 x 70 meters) into the site (Tveskov and Cohen 2007). Archaeologists and field school students from Southern Oregon University, Oregon State University (OSU), the Coquille Indian Tribe Cultural Resources Program (CITCRP), and the Confederated Tribes of Siletz Indians spent three days screening approximately 18 m^3 of sediment that had been removed during the trench excavation. Additionally, Tveskov and OSU archaeologists drew a stratigraphic profile of the utility trench, using a horizontal base line measuring meters along the south side of the trench westward from a point opposite the middle of the intersection of Cleveland Street with 1st Street.

Although not located within one mile of the current project area, in 2001, sediment containing cultural material that had been excavated from 35CS43 by the City of Bandon was placed at the Rogge Mill site. This material was subsequently screened by archaeologists and cultural resources staff from Southern Oregon University, Oregon State University, the Coquille Indian Tribe, and the Confederated Tribes of Siletz to recover human remains and artifacts (Figure 4 and Figure 5).

Figure 4. Material from site 35CS43 from Old Town Bandon being screened for cultural remains at the Rogge Mill site, 3 July 2001, photograph by Mark Axel Tveskov.

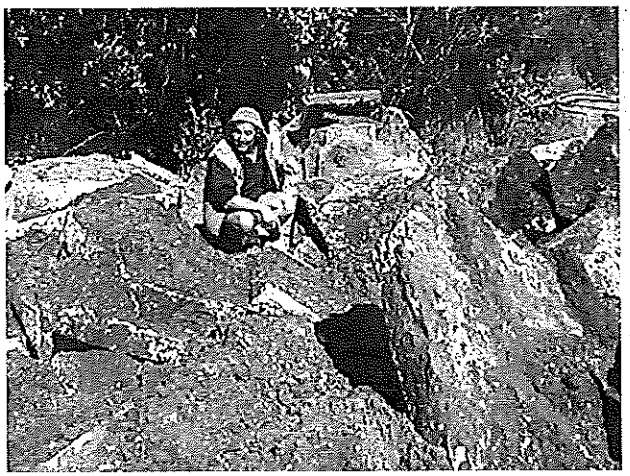


Figure 5. Chief Don Ivy of the Coquille Indian Tribe examining concrete sidewalk blocks and sediment removed from site 35CS43 to Rogge Mill, 3 July 2001, photograph by Mark Axel Tveskov.

Ethnographic Background

There is little direct testimony about Indigenous use of the Rogge Mill area, although Coquille elder Coquille Thompson, in interviews with anthropologists James O. Dorsey (1884, 1890) and John Peabody Harrington (1942) described two places that are possibly associated with or near the current project area. One of these was *Ni-Les-tunne* "People at the small dam (in the river)" (Dorsey 1890:232, 1884:3; see also Harrington 1942[26]:0159, Tveskov 2002). As described by Coquille Thompson to Harrington, Ni-Les' Tun was the ancestral home of Coquell Ned, a contemporary of Thompsons, and this community was located on the south bank of the Coquille River opposite *K'ama'c dun*, one of the largest Nasomah Coquille communities that was located within present day Bullards Beach State Park (Tveskov 2002). Coquell Ned refers to Charlie Ned,

who, with his wife Susan Ned, lived in the Bandon area well into the 20th century and whose descendants are among today's Coquille Indian Tribe (Hall 1984:75). One of Charlie and Susan Ned's contemporaries was Charlie Taylor, who also lived and worked in the Bullards area into the 20th century (Figure 6). Like the Neds, Charlie Taylor's relations are among today's Coquille Indian Tribe.

Figure 6. Charlie Ned and Ruthmary and Jack Bullard at the Bullard's ferry landing on the north side of the Coquille River opposite the current project area, ca. 1918. (Bandon Historical Museum photo 17964)

Project Area History

The Rogge Mill property features into the settler history of Bandon, first as a ferry landing and later as a lumber planing and plywood mill. The project area was part of the south landing of Bullards Ferry the main means to cross the Coquille River from the 19th century through 1954, when the Highway 101 Bridge was constructed (Beckham 1997:23). The area known as Bullards—named after early Bandon school teacher Robert Bullard—was established on the north side of the river opposite the Rogge Mill property in the 1850s and 1860s as a sawmill, post office, store and ferry landing by George Richard Wasson, John Hamblock, Adam Pershbaker, and others (see above and Figure 7). Through the mid-20th century, this ferry operated using ramps of wooden slats and rails. Photographic evidence indicates that on the south bank within what is today the Rogge Mill property, the ferry ramp lay just upstream from a larger elevated wooden platform used to load or offload a taller ship (Figure 8). The ferry remained in use at least until the completion of the Highway 101 bridge in 1954 (Figure 9 and Figure 10).

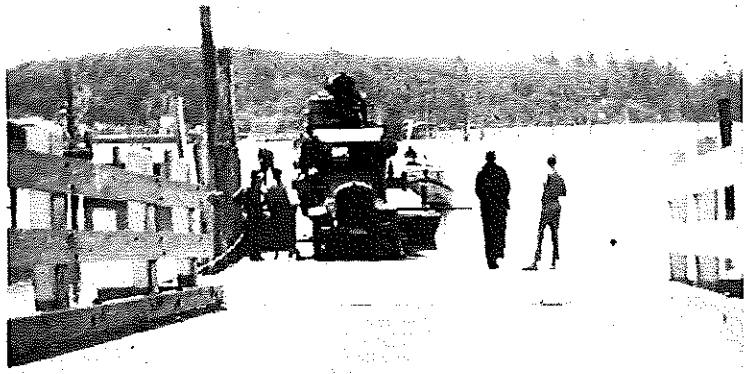


Figure 7. View south from the Bullards ferry landing at the Rogge Mill project area on the south bank of the river, 1919. (Bandon Historical Museum, photo 28968).

Figure 8. View north from south boat ramp, 1920. Note the taller pier to the left (i.e., west) of the boat ramp. (Bandon Historical Museum, photo 28968).

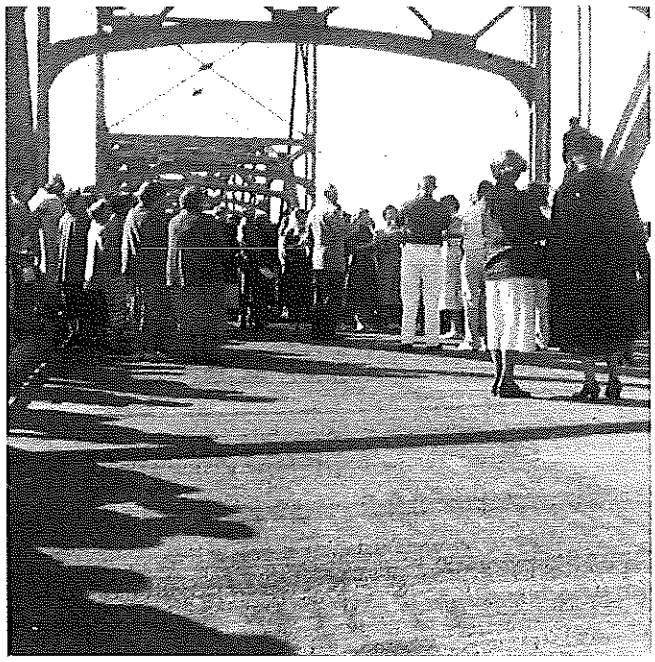


Figure 9. Dedication of the new Bullards Bridge over the Coquille River, 20 September 1954. (Bandon Historical Museum, 17331).

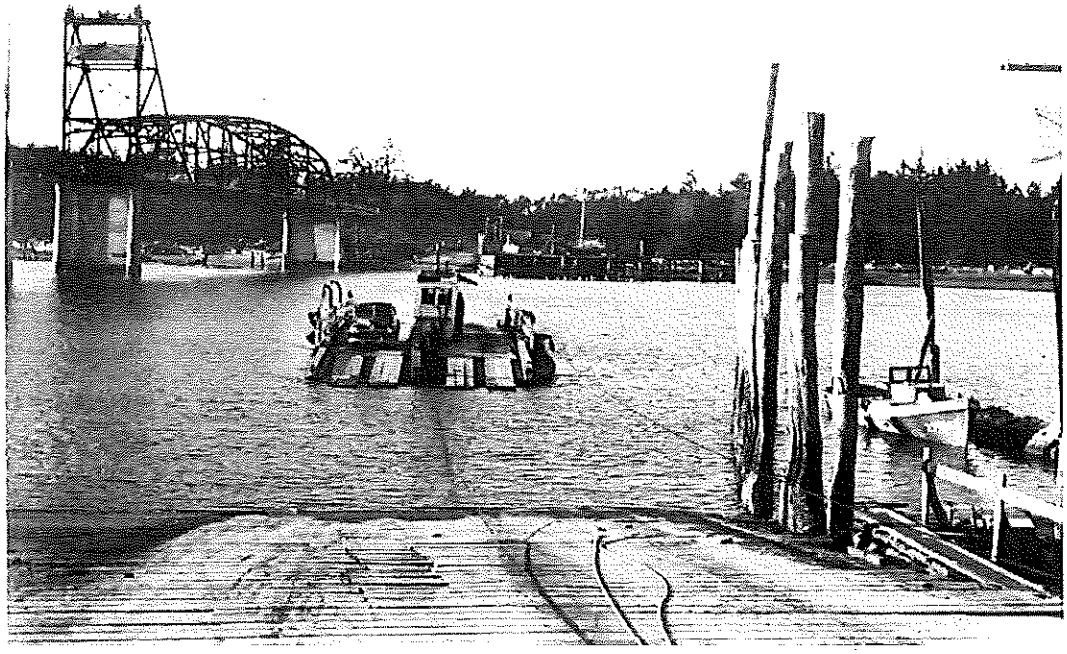


Figure 10. Photograph marked "last trip of the Bullards Ferry, mid-1950s" taken view north from the south ramp within the current project area. (Bandon Historical Museum, photo 30017).

As discussed above, the development of Bandon accelerated after the turn of the century with the introduction of electricity to the region. The population doubled in the first decade of the 20th century, and many mills were constructed in Coos County as part of an associated boom in the timber-cutting industry, including the Moore Mill adjacent to Bandon on the Coquille River (Robbins 1988; Beckham 1997; Lansing 2020). Timber cutting and milling had largely been a local, small scale affair since the 1850s, but accelerated in pace and scale dramatically in the 1890s through a confluence of factors. This was the era of improvements to the river mouth through the construction of jetties and navigational aids, and regional and national rail networks had just arrived in the Pacific Northwest, linking major ports with industrial and population centers in California and back east. This was part of a larger industrial movement that saw—within the logging industry—the invention and implementation of the steam donkey (i.e., a steam powered winch to yard logs) and the use of relatively portable narrow-gauge railroad lines to access stands of trees deep in the forests and mountains—both factors contributing to a larger, industrial scale ability to cut down, transport, and process trees. Finally, tracts of woodlands in the eastern states were nearing exhaustion through overharvest. These factors and more led capitalists to turn their attention to the vast stands of trees in Oregon and Washington.

While Puget Sound and Washington generally had a head start due to the proximity of its forests to better natural harborage and the terminals of the transcontinental railroad, Coos County joined the race to cut old growth forests in earnest following the destruction of San Francisco by fire in 1906 (Beckham 1997:106). By 1920, with leverage from investors from back east, vast tracts of timberlands were purchased, often through clandestine or illegal means, and elaborate logging operations were organized and implemented. The trees cut *en masse* were trucked, railroaded, or rafted to large mills that were then constructed across Coos County (Robbins 1988, Lansing 2020). These included, among others, the massive facility operated by the C.A. Smith company of Minnesota, whose owners had expanded their operation into Oregon in 1912 as the local white pine stands were depleted (Robbins 1988:33; Lansing 2020:159). By the time of their move, the C.A. Smith company had acquired some 180,000 acres of forest in Coos County with an "estimated timber inventory of over 19 billion board feet." The C.A. Smith company went on to purchase a local sawmill of the E.B. Dean company and also constructed the so-called "Big Mill" on nearby Bunker Hill in Marshfield on Coos Bay at the mouth of Isthmus Slough. The Big Mill was one of the largest in the region, and at its peak, C.A. Smith controlled some 300,000 acres of forest and employed over 600 people (Figure 11). The remains of the Big Mill today are within one of the environmentally and socially challenged areas of Coos Bay.

Many of the logs destined for the Big Mill were routed to Coos Bay via a railroad constructed up Isthmus Slough then up the Coquille River that were part of operations overseen by Albert Powers, another early timber baron of Coos County (Tveskov et al. 2014; Robbins 1988). Within just a few years of the construction of the Big Mill, large trees had become scarce in the Coos Bay region, and Powers, and associate of Smith, began to purchase right-of-ways and timber tracts far up the drainages of Coos County. In 1912, Powers established the town that still bears his name today high on the South Fork Coquille River, and by 1920, Powers was "the center of one of the biggest logging operations in the United States" (Robbins 1988:46). The Powers operation, like many others, was intense, environmentally and socially devasting, and short lived. The decline of these operations began in the 1930s due to the exhaustion of old growth trees to cut and the effects of the Great Depression.

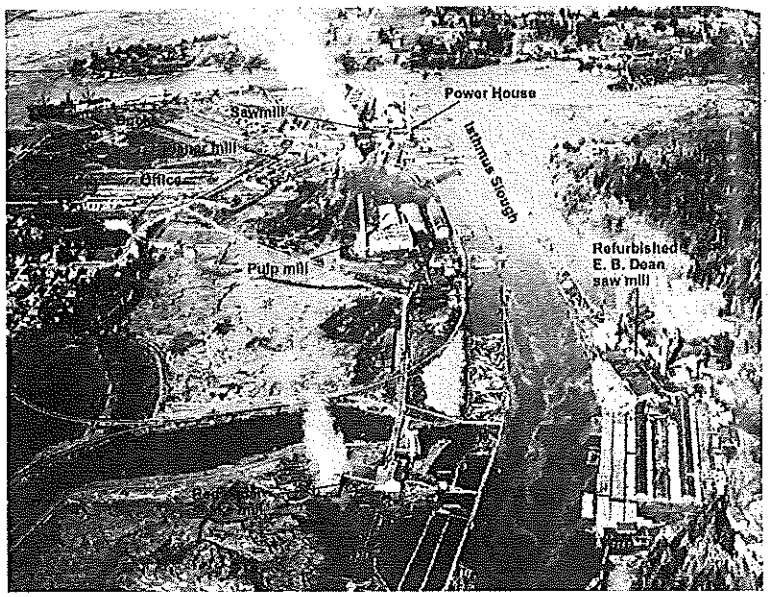


Figure 11. The "Big Mill" at the mouth of Isthmus Slough on Bunker Hill on Coos Bay, run by the C.A. Smith lumber company, 1915 (From Lansing 2020:166).

Rogge Mill

Unlike Coos Bay, the lower Coquille River area was somewhat hampered by the smaller scale of its port and the depth of the river. Nonetheless, some timber mills were established in the same decades of the early 20th Century, and the Moore Mill was the largest. Like many of the other concerns, the Moore Mill was conceived and run by an enterprising settler, in this case one George W. Moore. Moore had initially built a smaller mill with a partner, but in 1909 he bought out his friend and began construction of a larger operation that would become Moore Mill (Beckham 1997:47). The company and its facilities expanded rapidly, and was built on pilings driven into the mudflats on the east side of the Coquille River just northwest of Bandon. Unlike nearby Coos Bay, the lower Coquille River was almost entirely land locked, and access and commerce was and continued to be by sea. By the 1930s, the facility included a shipyard and other businesses, although log milling and export was the primary activity, and this included the export of large cedar "Japanese Squares" in demand in Japan at that time (Beckham 1997:106). The Coquille River valley was amenable to dairy farming, and the Moore Mill became a hub where the Nestles Company, starting in 1919, began processing locally produced milk into cans of evaporated milk. By 1922, the Nestles plant was producing 150,000 ponds of condensed milk a day. This operation was taken over by the Dalen company in 1925.

Coos County's timber facilities were affected by the demands of not only burgeoning populations elsewhere on the West Coast, but also the exigencies of the World Wars. In 1918, labor shortages required that U.S. Army soldiers be stationed at local mills (Beckham 1997:97), and just as regional concerns were suffering from the effects of the Great Depression and the waning availability of large trees, the development of waterproof adhesives, large scale lathes, and the emergence of practical internal combustion trucks and machinery provided a new outlet: plywood

(Robbins 1988; Lansing 2020). This innovation, coupled with the demand of wood during World War II, allowed mill operators to increase timber production and processing to a large scale one last time—this time focused on smaller diameter logs—an era that persisted into the 1980s.

The post war boom in logging of smaller trees, often for plywood, fueled the development of what would become Rogge Mill. As evidenced by an aerial photograph taken in 1945 and other documentation from the Bandon Historical Museum, at the end of World War II what would become the Rogge Mill was characterized by the south terminal of the Bullards Ferry as well as a small industrial concern built on pilings within the estuary (Figure 12 and Figure 13).

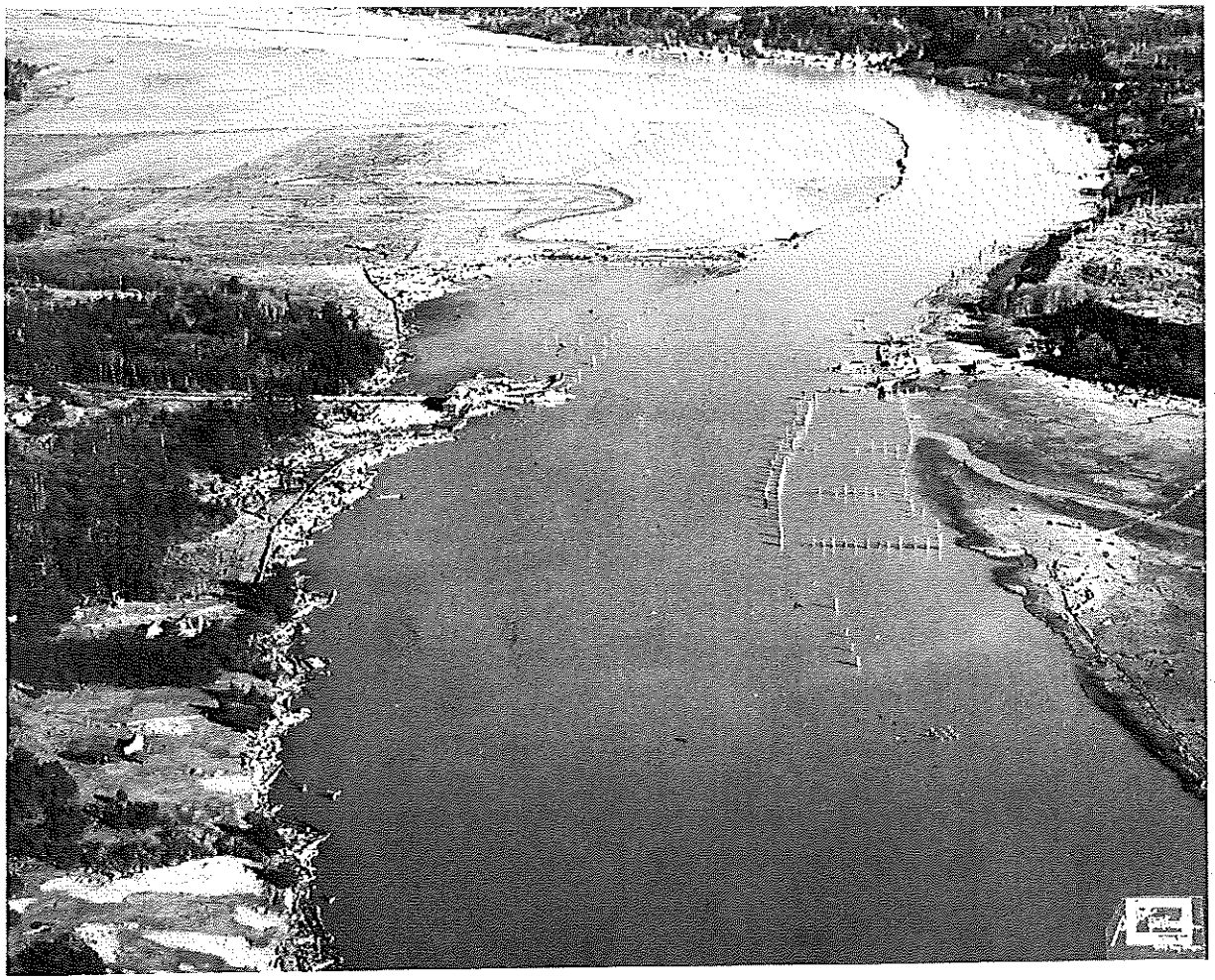


Figure 12. The Coquille River ferry crossing, 1945, view east. Note the building set on piers on the estuary mud flat where the Rogge Mill property is located on the south side of the river (right side of the river), adjacent to and east of the ferry landing. Bandon Historical Museum, Photo 14707).

Figure 13. View northwest from the bluff within the current Rogge Mill property, showing the industrial building adjacent to the ferry landing on the left, and the Bullards area on the north.

The development that would eventually become known as the Rogge Mill started in April 1953 when the property was used to further develop the Bandon Veneer and Plywood mill, then known also as the Dollar Mill (Sensabaugh and Smith n.d.:1). By 1956, the plant had been sold to the Textron company who invested $200,000 in the operations expansion (Sensabaugh and Smith n.d.:1). A newspaper clipping dated to 12 April 1956 on file at the Bandon Historical Museum shows the mill at this time having rapidly expanded to include two large adjacent buildings, a wigwam burner, and ancillary structures located just east of the still extant but now dilapidating ferry landing (Figure 14, Figure 15, Figure 16). Photographs from this era show the south ferry landing in bad shape but still largely intact. By 1958, the concern was bought by Roseburg Lumber Company, who "ran the mill for a couple of years before shutting it down. . . . The mill sat idle for a couple of years before being purchased by Ken Rogge" (Sensabaugh and Smith n.d.: 2). Rogge converted the operation into a planing mill processing milled lumber from Rogge's other plant south of Bandon. The operation was run for the next three decades by a local staff that included Pete Goodbroad, former Captain of an Oregon State University baseball team that had travelled to Omaha, Nebraska for the College World Series in 1952, where they lost in the first round.[1]

[1]https://en.wikipedia.org/wiki/1952_College_World_Series?fbclid=IwAR0OUnIv04M-aFLJ2rN8EYTGJoDaobaaJ2erhpvWJEth_Sf2Tz1lhyYx91s; https://osubeavers.com/honors/hall-of-fame/team-1952-

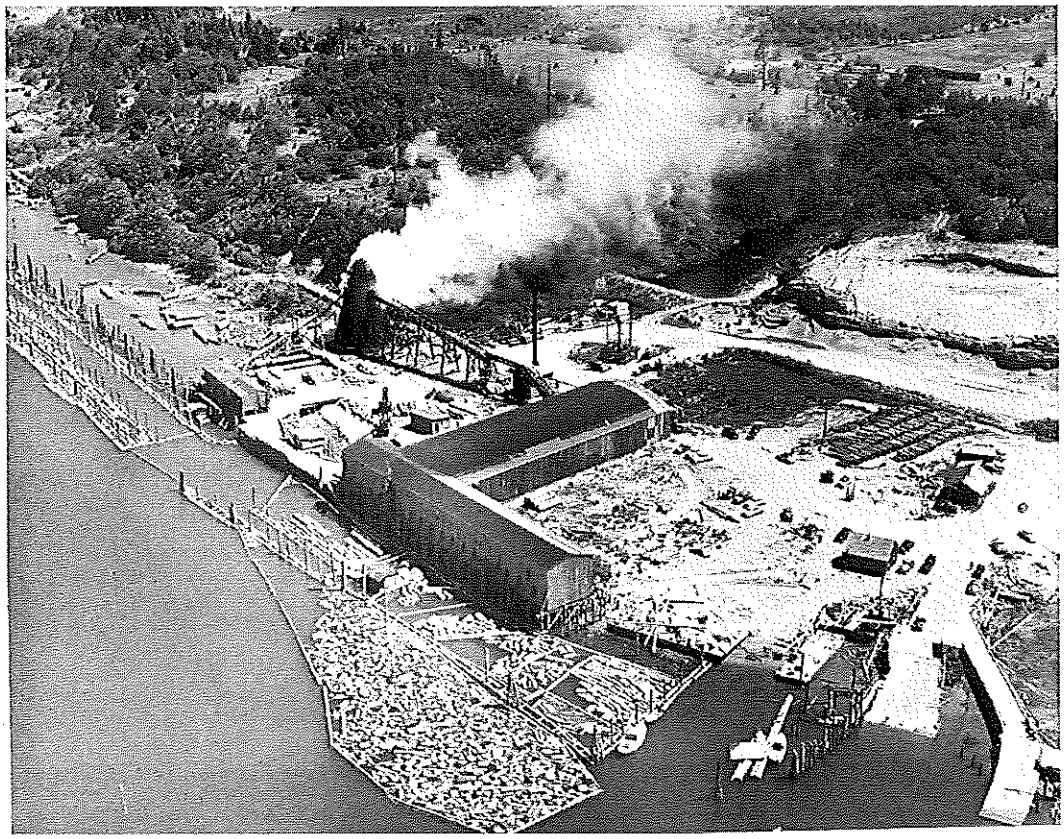


Figure 14. The Rogge Mill, sometime between 1953 and 1956, showing its rapid expansion in this era. Note the excavation of the bluff behind the mill as a material source, the construction of a dam across the creek, and the still extant ferry landing on the lower right.

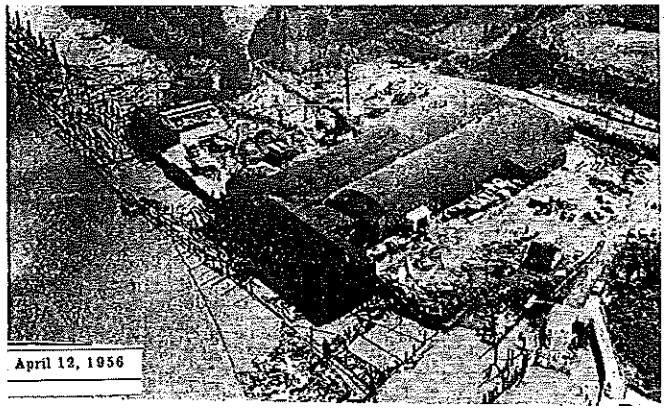


Figure 15. Newspaper clipping on file at the Bandon Historical Museum dated 12 April 1956, showing the rapid expansion of the Rogge Mill complex at this time, view southeast.

college-world-series/133?fbclid=IwAR20TEfW_hzTaBjJSLbxyPgZMDVrWcPZmUKN_STCif-gPxSq-MGEC_I_o_0; accessed 27 January 2023.

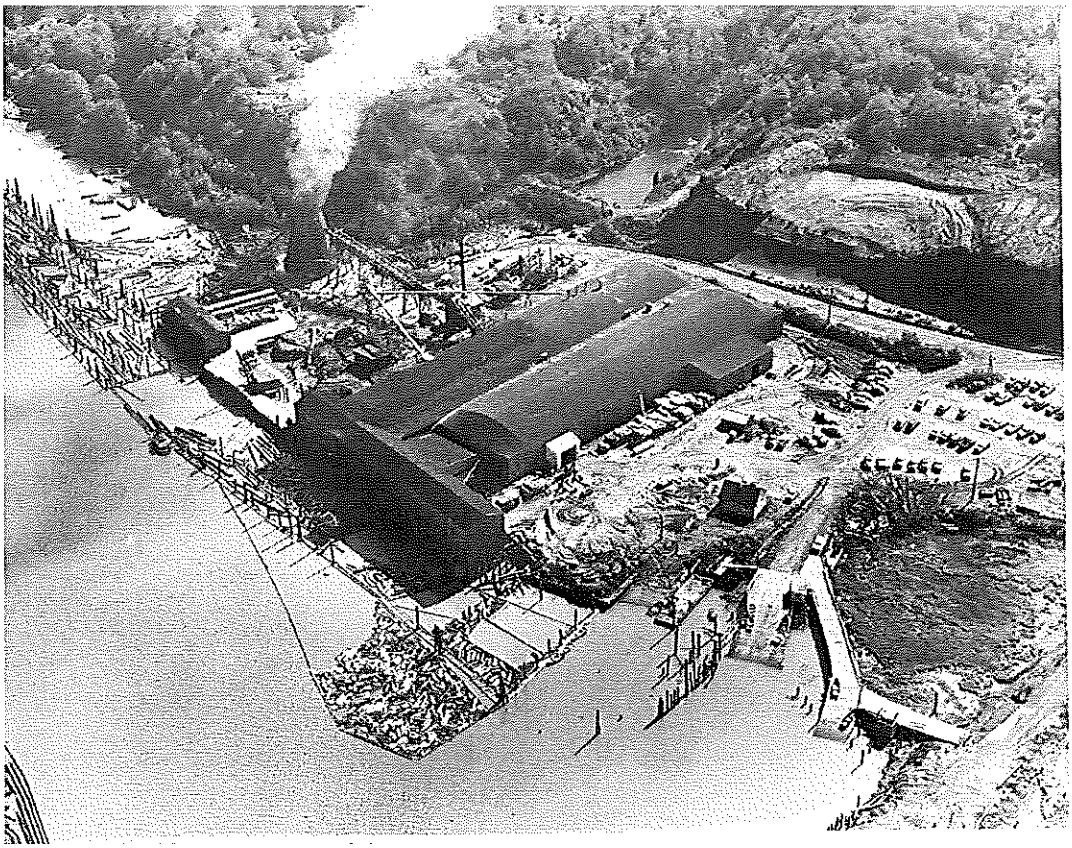


Figure 16. The same photograph, on file at the Bandon Historical Museum (photo 72371). Note the large excavation in progress to the south of mill, as material is being removed from the bluff face. The ferry landing and adjacent dock are still visible on the lower right side of the picture, as is a small concrete square building on the very lower left side.

The Rogge Mill was a successful business through the 1960s and 1970s (Figure 17, Figure 18, and Figure 19). By the 1980s though, environmental concerns and market forces had created challenges for Oregon's timber operations, as logging of the remaining old growth timber was curtailed and milling jobs (the source of most of the labor in the timber industry) were moved overseas along with raw logs. Accommodations were made, and *The World* newspaper reported on 27 January 1982 that the Rogge Mill had rehired back 25 workers after adjusting their equipment to process logs into metric sizes, to be then shipped to Portland for export to Japan. The article bemoaned the fact that until other mills began to process logs this way, jobs would continue to be lost as raw logs were imported overseas for milling. By that June, *The World* (2 June 1982) reported that Rogge Mill was operating one shift of 30 people, only half their peak capacity, cutting metric lumber for export to Japan.

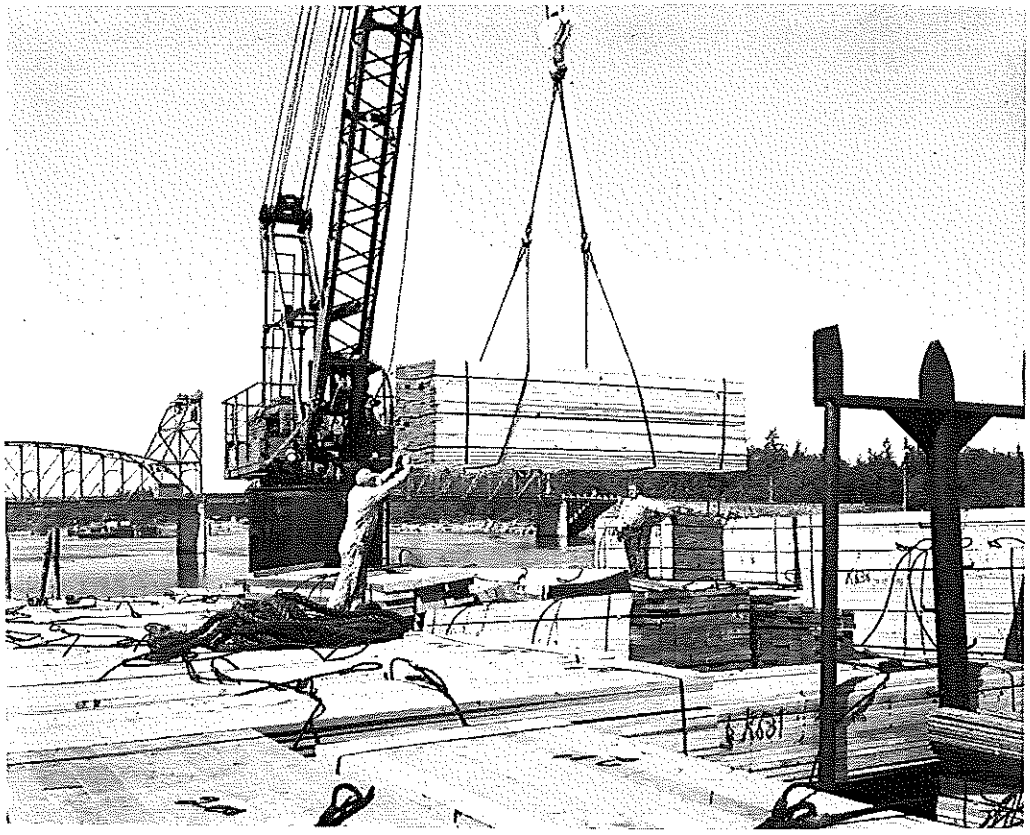


Figure 17. Undated photograph, Rogge Planing Mill. (Bandon Historical Museum, photo 72359).

Figure 18. "Pete Goodbroad and his Rogge Lumber Truck, ca. 1960." (Bandon Historical Museum, photo 60078).

Figure 19. "Rogge Lumber Sales, September 1970." Note the still extant but dilapidating ferry landing ramp, and the adjacent dock to the right, now collapsed. The square concrete structure that once stood on the dock is still extant on the lower right of the picture. The earthen ramp in the right foreground is still extant, and was likely built for the Highway 101 bridge construction.

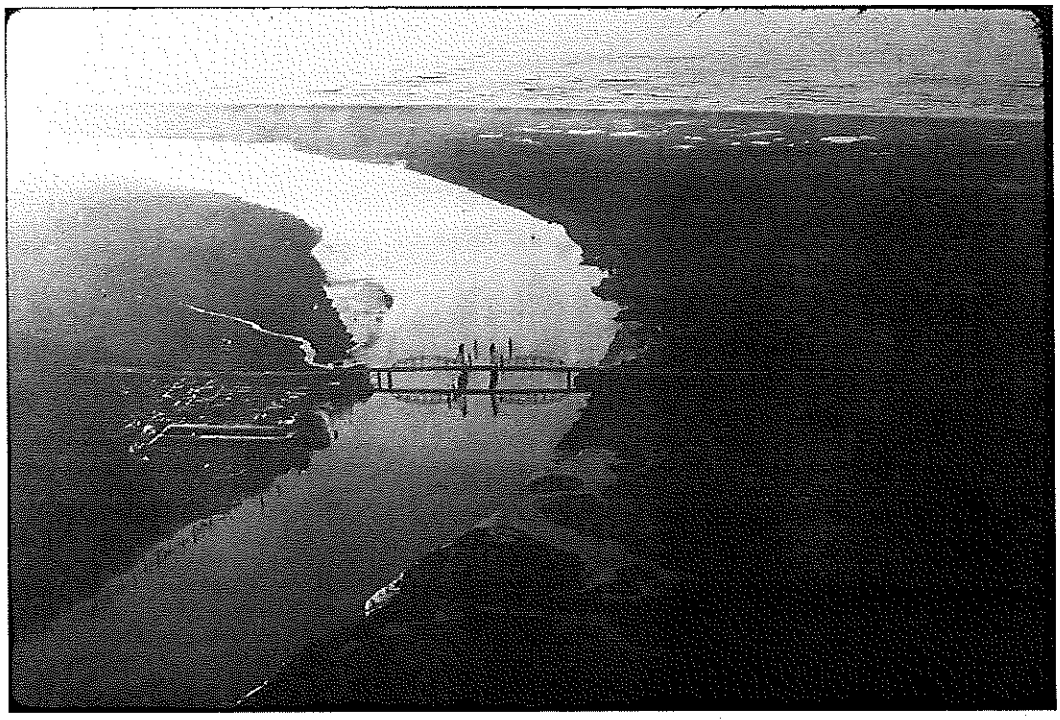


Figure 20. Götterdämmerung. Rogge Mill (left), ca. 1985, view west. (Bandon Historical Museum, Photo 43788).

In June 1990, then Oregon Gubernatorial candidate, former Oregon Attorney General and future University of Oregon president David Frohnmayer addressed a worried crowd of Rogge employees concerned about the listing of the spotted owl as an endangered species (*The World*, 25 June 1990). Frohnmayer spoke of proposed legislation with Congressman Les AuCoin and Senator Mark Hatfield that would provide both economic stability and environmental protections, but a Rogge employee expressed worry that "all they're saving [old growth forest for] is a nice thunderstorm and a wonderful forest fire." Frohnmayer expressed worry that if rural jobs were not preserved, that we would "end up with two Oregons—one a rapidly growing metropolitan area and the other place you grew up and care about but can't afford to live in." Rogge Mill closed its doors on Valentine's Day, 1996.

Figure 21. Oregon gubernatorial candidate Dave Frohnmayer speaks with Barbara Rogge-Faulkner and Larry McLaughlin at Rogge Mill, June 1990. (Bandon Historical Museum, photo 163788).

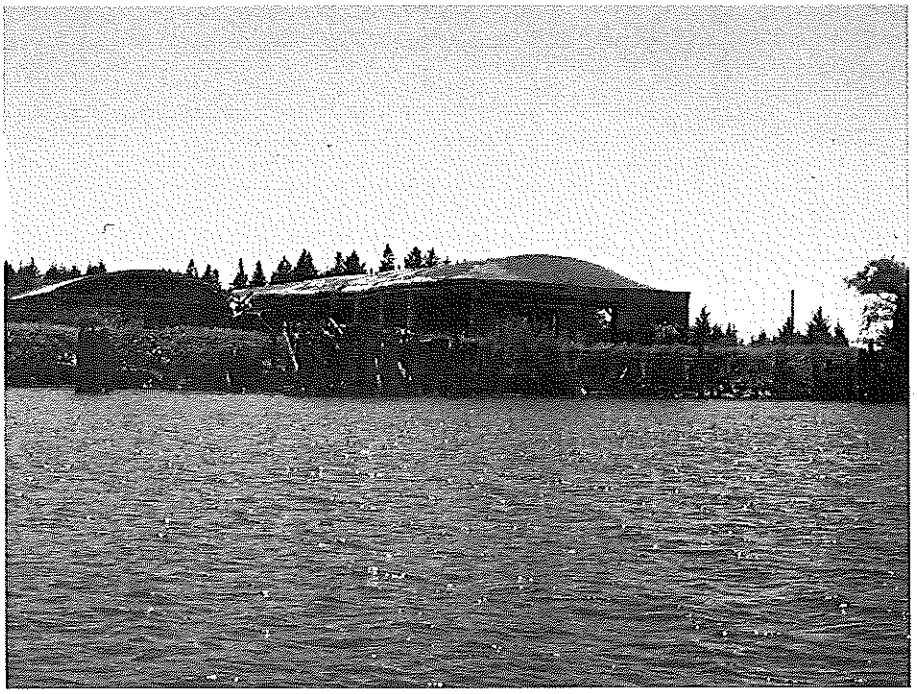


Figure 22. Rogge Mill shortly before demolition, 2019. Photography courtesy of Jim Proehl, Bandon Historical Museum.

Cartographic and Aerial Photograph Analysis

As presented above, background research for the Rogge Mill property including a survey of the archaeological site records maintained by the Oregon State Historic Preservation Office (SHPO), and historical materials relating to the Bullard's Ferry, Rogge Mill and their context in local history. From these we know that there is a good possibility Indigenous cultural sites such as wood stake fish weirs and shell midden deposits could have been located on the project area and that up 1954 the south landing of the Bullards Ferry was located in the project area. From the standpoint of preventing adverse impacts to intact and significant archaeological sites, I also compiled cartographic information to demonstrate the fact that the landform that today comprises much of the project area is entirely artificial, resulting from the construction—upon open estuarine mudflat—of the Rogge and its associated structures, docks, burners etc., and the subsequent demolition and infilling as the facility fell nearly into complete disuse. This process is demonstrated through nautical charts, General Land Office maps, aerial photographs, and U.S. Geological Survey maps produced since the mid-1800s.

An early cartographic image of the lower Coquille River estuary in 1857 is provided by the General Land Office (GLO) and available online through the U.S. Department of the Interior's Bureau of Land Management. This map was produced following surveys by M.O.C. Murphy and D. Murphy in December 1957, shortly after the wholesale removal of Indigenous people from the region and just as settler colonization was getting underway (Figure 23). This map shows the termination of the north south trail at a structure at what is today's Bullards Beach State Park as well as the early sawmill on Fahey's Creek, but no settler development is shown on the south bank of the Coquille River where the Rogge Mill would eventually be built. A similar configuration is shown in an 1861 nautical chart of the Coquille River produced by the U.S. Coast Survey (Figure 10). The

main channel of the Coquille River is shown running north south against the sand spit, and open mudflats are shown where the Moore Mill complex would be built. A second GLO map, drafted in 1872, again shows an unchanged configuration, with open mudflats where the Rogge Mill would be constructed (Figure 24).

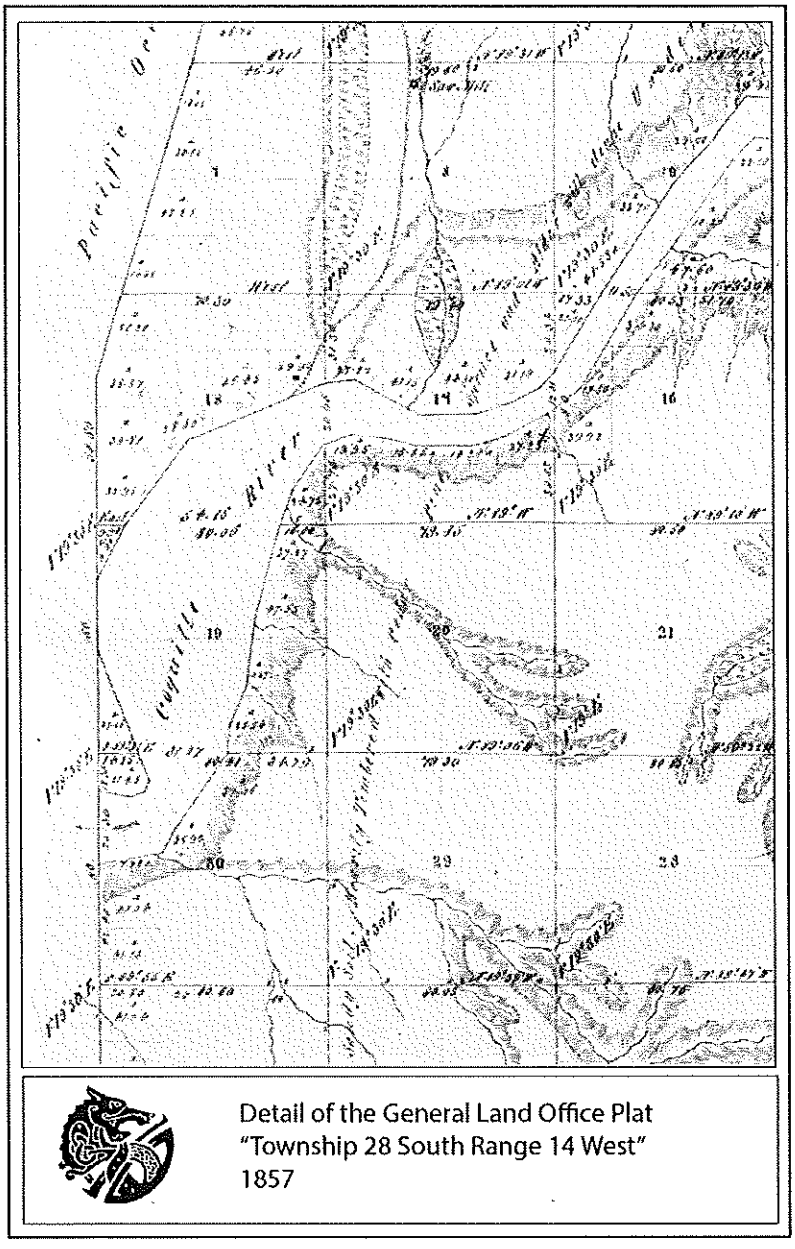


Figure 23. Detail of the 1857 General Land Office survey map of the lower Coquille River, showing the early development of Bullards and the sawmill on Faheys Creek. No development is shown within the current Rogge Mill project area.

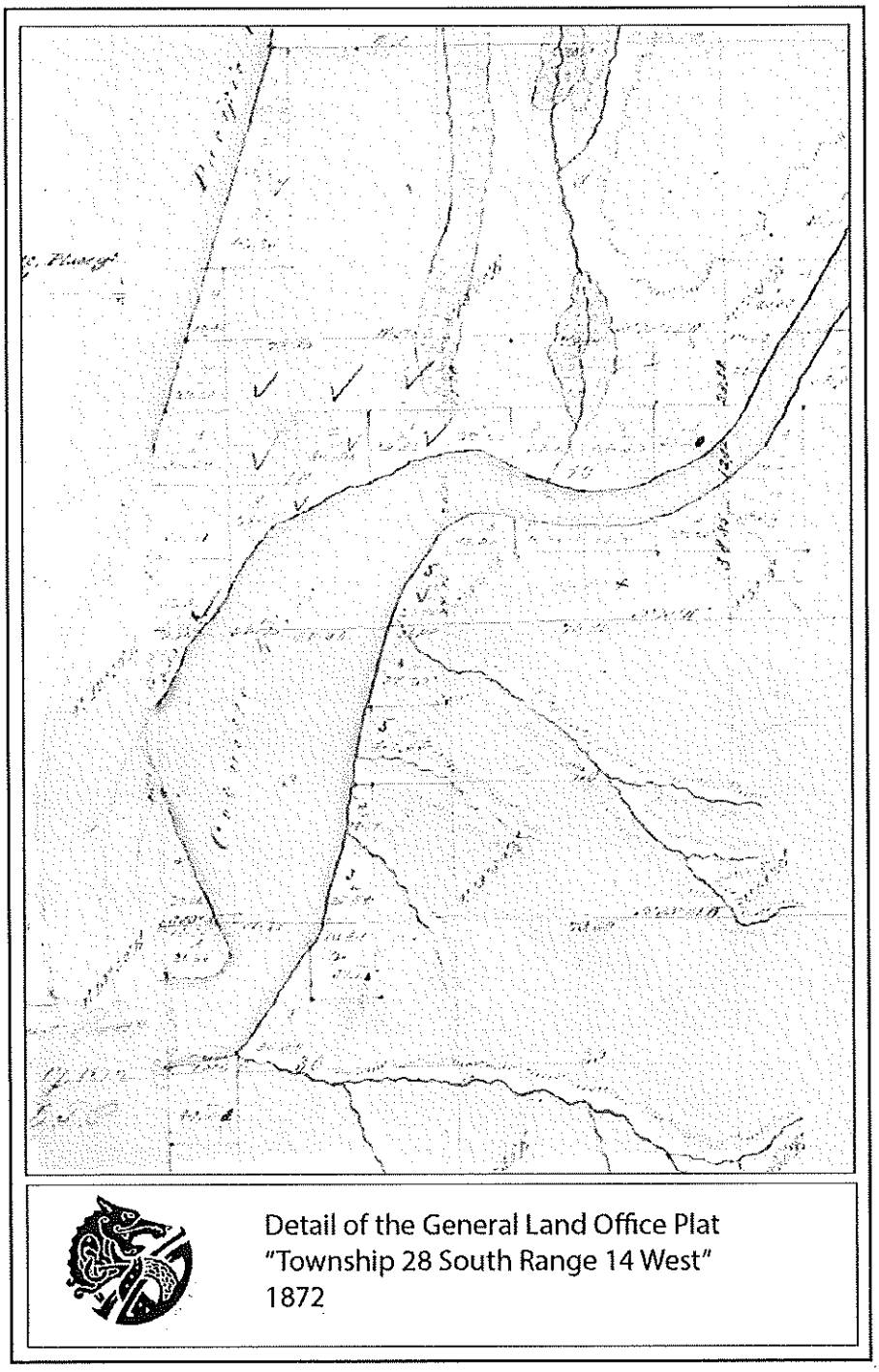


Figure 24. Detail of the 1872 GLO map of the lower Coquille River. This was drawn on the eve of the rapid acceleration of development and industry in the region. At this point, no development is shown over the Rogge Mill property.

The first USGS map of the area was produced in 1898, just as the industrial development of Coos County was underway (Figure 25). These changes are reflected on the map: the city of Bandon is now well developed, the lighthouse and south jetty are in place at the mouth of the river, and there is a road system in place that includes today's Riverside Drive leading to the now operational Bullards Ferry. While the south ferry landing is in the current project area, the Rogge Mill has yet to be built over the estuarine mudflats as of this date.

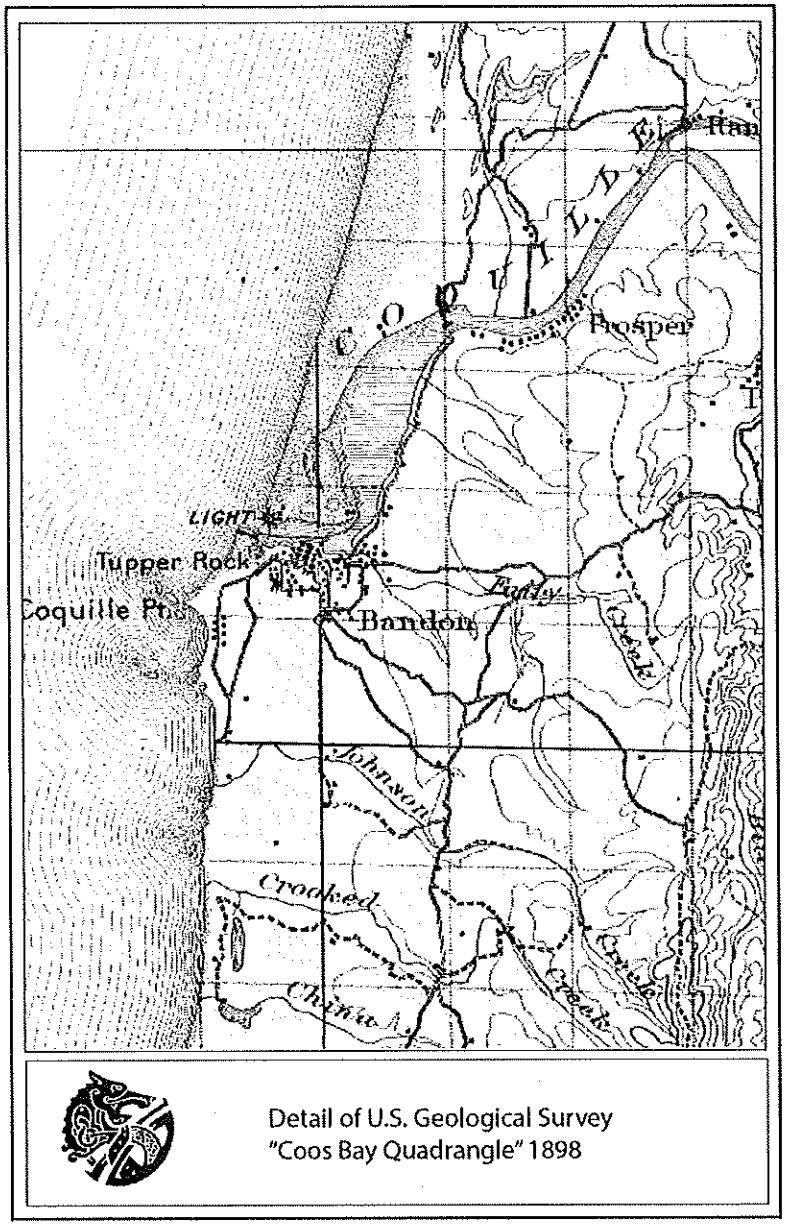


Figure 25. Detail of the 1898 USGS quad map of the lower Coquille River, showing the rapid pace of industrial and civic development at this time. The town of Bandon is now well established, and the mouth of the Coquille River is secured by a jetty on the south side and a lighthouse on Rackleff Rock on the north side.

The south ferry landing is shown clearly in a 1939 aerial photograph (Figure 26). The south landing is connected to Riverside Drive leading towards Bandon, both the ferry ramp and the adjacent dock are shown in place, and there is an industrial building on piers adjacent to the ferry landing to the east. The bluff to the south is shown intact during at this time. A 1954 aerial photograph, taken just following the completion of the Highway 101 bridge, shows the rapid pace of mill's expansion (Figure 27); the Highway 101 bridge is in place, the bluff face on the south side of the current project area is being excavated, industrial buildings are now constructed on the artificial platform covering the mudflats, and the small creek running through the property has been dammed.

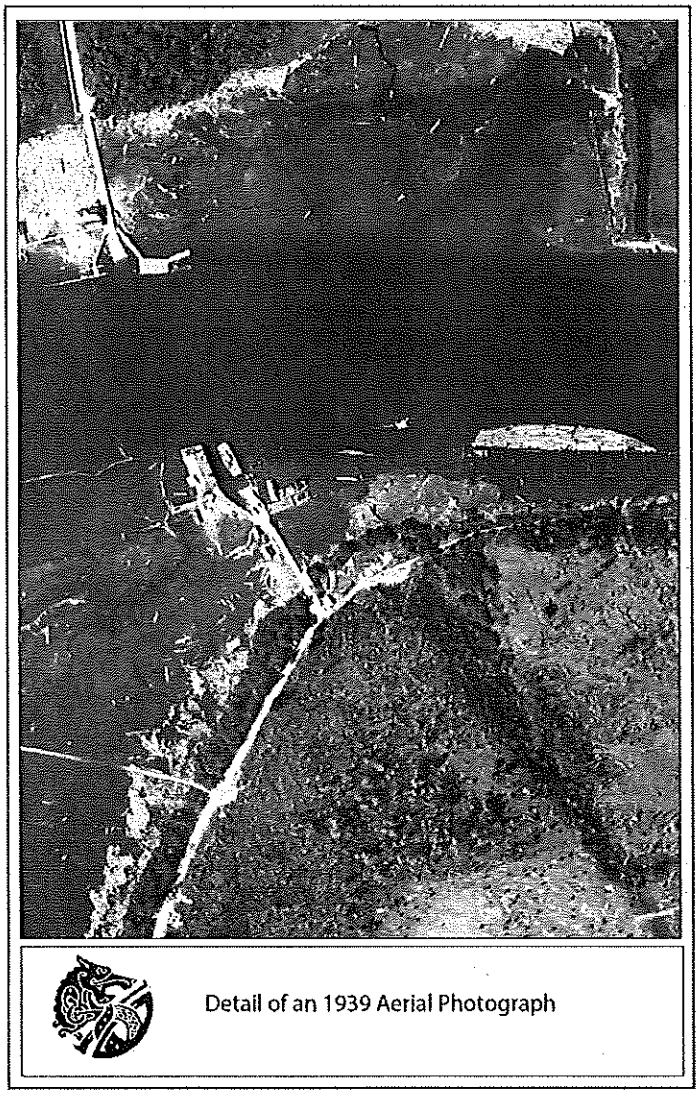


Figure 26. Detail of a 1939 aerial photo of the lower Coquille River. By this era, the Bullards Ferry is well developed and includes both the ramp and the adjacent dock. An industrial building is located on piers immediately east and adjacent to the ferry landing. Note that the south Ferry Landing takes a travel south to Bandon via Riverside Drive, and that the bluff behind road is intake and forms a smooth arch.

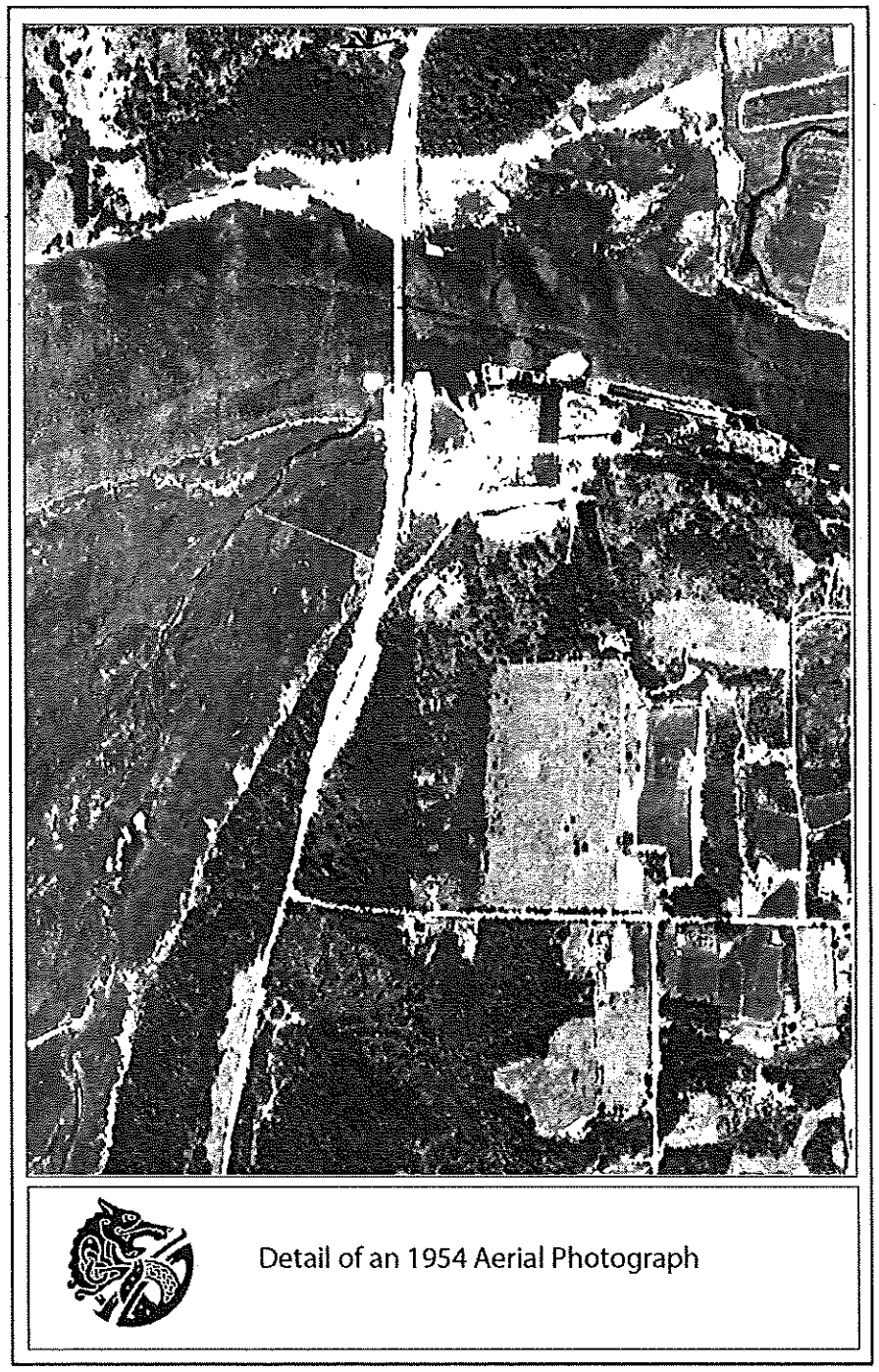


Figure 27. Detail of the 1954 aerial photograph of the project area, showing the rapid development of the Rogge Mill. Most of the complex is now complete, and the bluff behind the complex is being used as a material source to create the platform on the mudflats upon which the industrial buildings are placed. The earthen platform that parallels the south end of the bridge on its east side is now constructed, and this is still extant.

Archaeological Fieldwork and Findings

Fieldwork at the Rogge Mill property was conducted on 6, 13, and 14 January 2023 by Mark Axel Tveskov, accompanied by Anne Wolke, Esq and Gabrielle Bratt, Cultural Resources Technician for the Coquille Indian Tribe (Figure 28). This survey included a pedestrian survey of the entire property and a shovel probe survey on top of the bluff on the east side of the property.

The flat section of the property immediately adjacent to the Coquille River is an artificial construction of leveled-flat recent fill, gravel, asphalt, and the remains of the Rogge Mill industrial complex itself placed on top of estuarine sediments (Figure 29 and Figure 30). Surface visibility was generally poor to good in this area, and the sediments, according to the USDA Natural Resources Conservation Service, are comprised of level, No. 57. Udorthent soils, i.e., dredge spoils, dune sand, and wood chips deposited over marshes, tidal flats, and flood plains. The entire property was surveyed using meandering pedestrian survey transects spaced up to 10 meters apart, although areas of obvious recent and industrial fill were more widely observed.

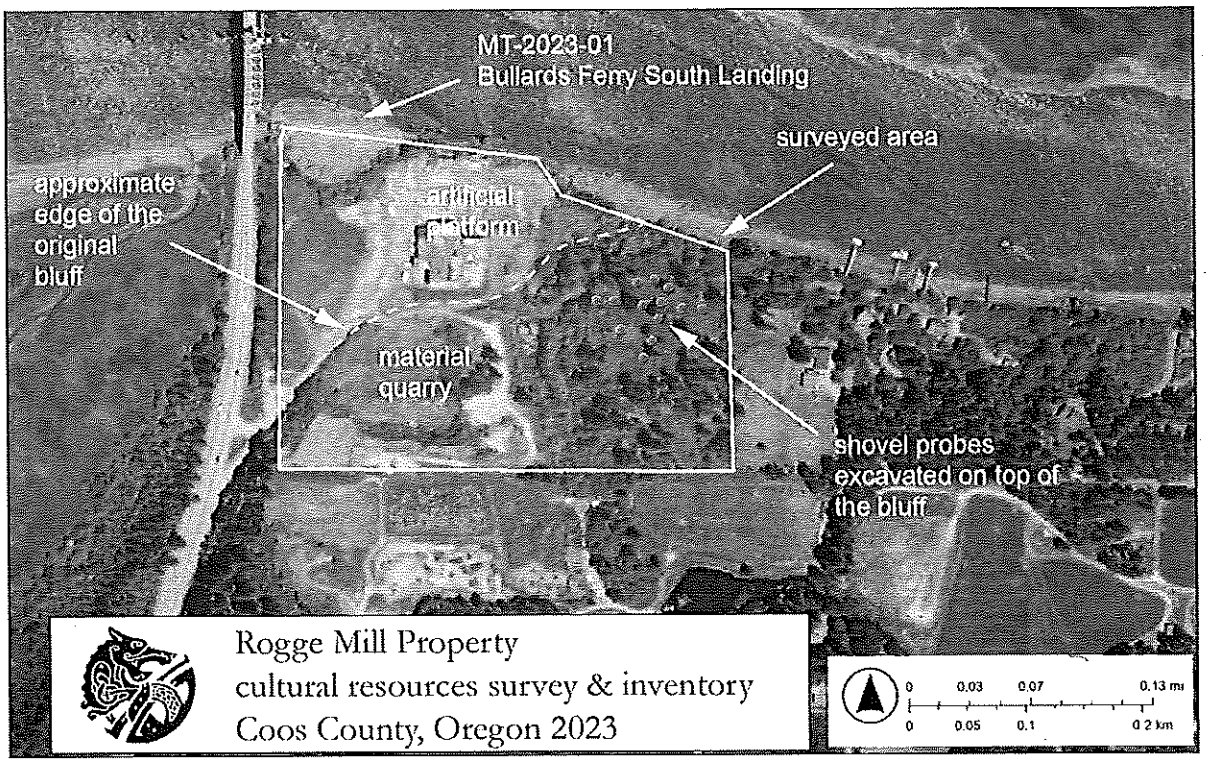


Figure 28. Archaeological survey of the Rogge Mill property, January 2023.

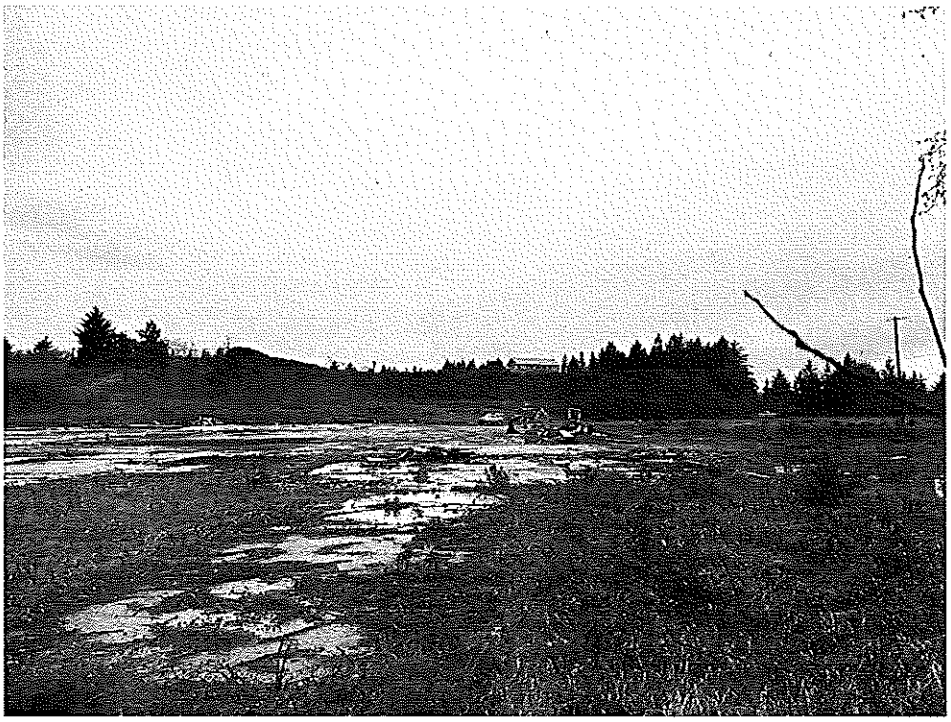


Figure 29. The artificial landform at the Rogge Mill property, view south from the edge of the Coquille River, showing the extant concrete and asphalt platform upon which the industrial buildings once stood.

Figure 30. View east across the asphalt platform of artificial fill.

Although the remains of the post 1953 Rogge Mill were apparent across the landscape in the form of metal, concrete, asphalt, a dam across the creek, metal debris, and other detritus, these are heavily disturbed and I do not regard them as a significant cultural resources. However, the remains of the Bullards Ferry south landing are still extant, emerging from the north facing of the platform of fill on the northeast edge of the property just east of the Highway 101 Bridge (Figure 31). These remains include numerous pilings emerging from the estuarine sediments as well as some structural remains of the ramp itself and a concrete block house that once stood on a portion of the dock adjacent and just west of the ferry landing. The flat earthen platform that parallels the Highway 101 Bridge is located adjacent and just west of the old ferry landing, but this does not appear on the 1940s aerial photographs and was likely constructed as part of the operation to build the Highway 101 bridge itself.

Figure 31. The remains of the south landing of the Bullards Ferry in the reemergent salt marsh along the south bank of the Coquille River in the northwest corner of the Rogge Mill property adjacent to the Highway 101 Bridge. The site includes numerous remnant vertical piers, some intact structural remains of the ramp itself, and a small concrete block house that once stood on the pier adjacent to and just west of the ferry ramp. This photograph shows the ferry landing view southeast from the earthen platform that parallels the Highway 101 bridge.

Figure 32. The Bullards Ferry south landing, view south southeast. The remains of the concrete block house are visible, and the horizontal beam on the left is a portion of the ramp of the ferry landing.

Figure 33. The remains of the boat ramp of the Bullards Ferry south landing, comprised of piers that supported the ramp and at least one horizontal element.

Figure 34. The boat ramp of the Bullards Ferry South Landing, view south.

The bluffs along the southern and eastern edges of the Rogge Mill property are ancient, uplifted beach deposits characterized by the USDA Soil Service as a No. 8a Bullards Sandy Loam, mixed eolian marine deposits. This area of the property presents two aspects: on the south, west of the small drainage that bisects the property, the bluff has been excavated away since the 1950s, forming an amphitheater-shaped material quarry almost to the southern boundary of the property. Other disturbances were evident from road grading and other impacts, and while ground visibility was high, no cultural resources were identified in this area (Figure 35 and Figure 36).

Figure 35. View east north-east from the top of the bluff overlooking the material quarry excavated out of the bluff face in the 1950s and 1960s.

Figure 36. View east along the edge of the bluff overlooking the material quarry. The Rogge Mill property line is just to the right. Note the extensive disturbance along this area and the good ground visibility.

The bluff area east of the drainage appeared much more intact, but ground visibility was moderate, limited primarily to a series of soil tests excavated for the proposed development. Given the intact landform and dense vegetation, I excavated 13 individual 30 cm diameter shovel probes on 20-meter intervals (or at least as close to 20-meter intervals as stands of gorse and scotch broom allowed) along the bluff. Each of these probes were excavated to a depth of at least 50 cm below the ground surface, and relatively intact sediment profile comprised of 1-2 cm duff layer followed by an A1 horizon of a medium or dark brown organic rich fine sand or silt with the amounts of roots and rootlets decreasing with depth and almost no coarse content. Eventually, every unit encountered—between 30 and 40 centimeters below the ground surface—a red-brown or yellow-brown subsoil of relatively consolidated very fine sand that in places, contained laminated lenses of finer yellow or whitish sands.

No cultural remains of any kind were observed in the pedestrian survey or shovel probes in this portion of the project area.

Figure 37. View west northwest along the bluff on the eastern edge of the property, showing the more intact landform and heavy vegetation.

Figure 38. View north from the bluff on the northeastern edge of the property, showing the restored marshes on the north bank of the Coquille River that include numerous archaeological resources.

Figure 39. One of several soil tests located on the bluff on the eastern edge of the property that provided some ground visibility.

Figure 40. Shovel probe excavation under way on the bluff area on the eastern edge of the property, 13 January 2023, view east northeast.

Summary and Recommendations.

Outdoorsuperstar LLC contracted Black Dog Archaeology LLC to create a cultural resources inventory of the Rogge Mill property and to assess its archaeological potential considering proposed development. The Rogge Mill property as surveyed comprises ~25 acres in Section 17, Township 28 South, Range 14 West of Coos County. Most of the landform of the Rogge Mill property is an artificial construction, the remains of fill torn from the bluff on the south side of the property that was used to create a platform covering the estuarine mudflats upon which industrial buildings were placed, and most of this construction occurred in the 1950s and afterward (Figure 41). The property, however, is near to a constellation of archaeological sites that includes lithic scatters, shell midden deposits, and house remains, all of Indigenous Coquille manufacture and use, and also include extensive deposits of wood stake fish weirs and traps found on and within the mudflat sediments just across the river and downstream from the Rogge Mill property. These same kinds of mudflat sediments are found beneath the artificial platform upon which the Rogge Mill complex was constructed. Additionally, the Coquille Tribe is concerned about additional cultural sites that are potentially found near or within the property.

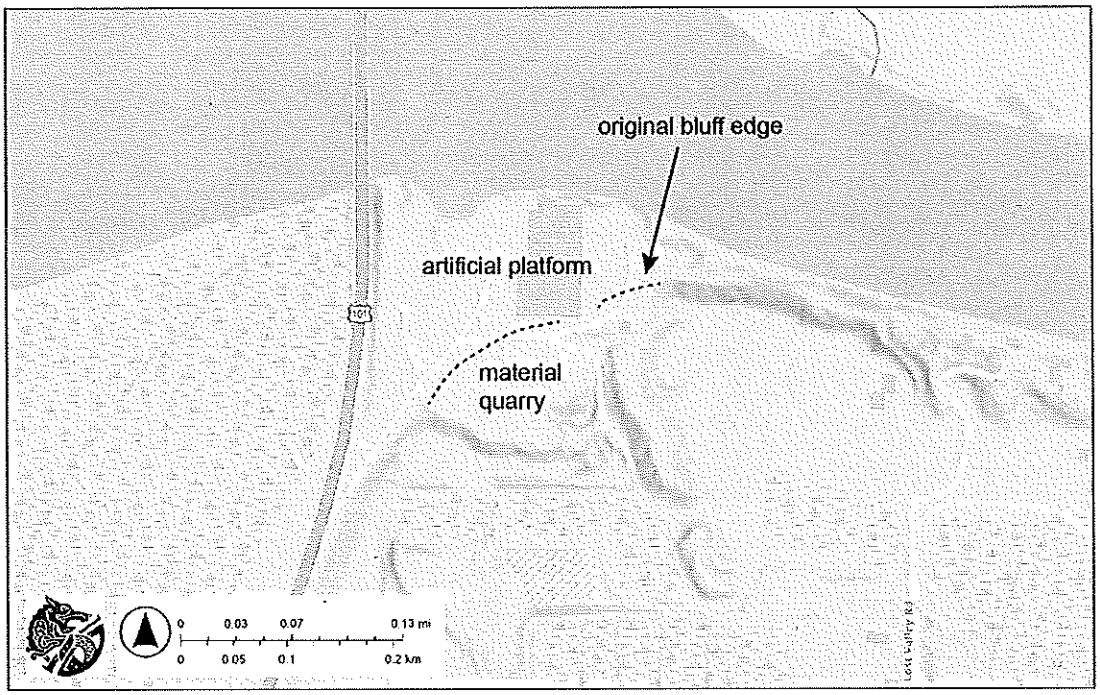


Figure 41. The geomorphology of the Rogge Mill property shown in LIDAR topography.

Archaeological fieldwork was conducted in January 2023 and covered the area along the river side on the artificial platform upon which the industrial buildings once stood as well as on the top of the bluffs to the south and east that are also part of the property. A series of 13 individual 30 cm diameter shovel probes were excavated on the bluff along the eastern edge of the property where the ground appeared to be relatively intact and where vegetation made ground visibility less ideal. I recorded a single cultural site, designated *MT-2023-01*: the remains of the south end of the Coquille River ferry that was in service up to 1954 when the current Highway 101 bridge was constructed.

This site includes pilings and other wood foundation elements as well as a small concrete structure that are visible on the surface of the ground protruding out of the industrial fill along the northwest corner of the property. These remains correlate to portions of the old ferry landing that are visible in photographs of the site dating up to the 1970s. This site has been entered into the site inventory of the Oregon State Historic Preservation Office. This site is found in an area of the property that is slated for conservation as a wetland.

Despite good to medium ground visibility, no other intact or significant archaeological materials were observed during this survey elsewhere on the property. Although there are remnants of the post-World War II industrial complex across the site—asphalt, metal debris, concrete, etc.—these are highly disturbed, of recent vintage, and I regard them not to be a significant historical or cultural resource.

With two caveats I do not believe that the proposed development of the property will have any adverse impact to any recorded or undiscovered cultural resources.

First: the property is located immediately adjacent to one of the most significant concentrations of Indigenous cultural resources on the Oregon coast, and the artificial platform upon which the Rogge Mill industrial concern was constructed was placed on top of the same kind of estuarine sediments that contain the wood stake fish weirs and traps just across the river. If ground disturbing activities were to occur that would disturb these underlying mudflat/estuarine sediments, this activity should be monitored by a qualified archaeologist to prevent or mitigate damage to any intact cultural materials.

Second: the area around the edge of the artificial platform along the northwest corner of the project area contains the archaeological remains of the south landing of the Bullards Ferry that was in operation from the late 1800s through 1954. These remains, documented in photographs and through archaeological survey, include remnants of the ferry ramp itself, an adjacent dock and small concrete blockhouse, and several vertical wood piers in the estuarine mudflats. This site has been registered with the site inventory of the Oregon State Historic Preservation Office and should be avoided during project development on the property.

Finally, significant archaeological resources are known or reported to be located within the vicinity of the property and the Coquille Indian Tribe regards the area as sensitive for cultural resources. There is always a potential that cultural resources could be encountered when a property is developed and ground disturbance occurs. Archaeological sites and objects—even those that have not been previously identified—are protected under Oregon law on both state and private lands (e.g., ORS 97.740-760). In the event that archaeological objects, features, or a site be encountered, all work within the immediate area should be stopped and appropriate Indian Tribe, the Oregon State Historic Preservation Office, or a professional archaeologist should be contacted.

References.

Barnett, Homer G.
1937 Culture Element Distributions: VII Oregon Coast. In *Anthropological Records* 1(3):155-203. University of California Press, Berkeley, CA.

Beckham, Dow
1997 *Bandon By-The-Sea: Hope and Perseverance in a Southwestern Oregon Town.* Arago Books, Coos Bay, Oregon.

Bennett, George
1927 A History of Bandon and the Coquille River. *The Oregon Historical Quarterly*, Vol. 28(4):310-357.

Byram, Scott
2002 Brush Fences and Basket Traps: The Archaeology and Ethnohistory of Tidewater Weir Fishing on the Oregon Coast. Unpublished Ph. D dissertation, Department of Anthropology, University of Oregon, Eugene, OR.

Byram, Scott and Donald Ivy
2004 Coquille Indian Tribe Archaeological Site Update Project. A Report to the U.S Department of Interior National Parks Service. Coquille Indian Tribe Cultural Resources Program, North Bend, OR.

Collins, Lloyd
1953 Archaeological Survey of the Oregon Coast from June 1951 – December 1952, Final Report. Department of Anthropology, University of Oregon, Eugene, OR.

Cressman, Luther
1953a Oregon Coast Prehistory. *American Philosophical Society Yearbook for 1952*, pp 2556-260.

1953b Oregon Coast Preshistory. Problems and Progress. *Oregon Historical Quarterly* 54:291-300.

Dorsey, James O.
1890 The Gentile System of the Siletz Tribe. *Journal of American Folklore* 3(10):227-237.

1884 Dorsey Papers. Manuscript 4800, National Anthropological Archives, Smithsonian Institution, Washington D.C.

Draper, John
1988 A Proposed model of Late Prehistoric Settlement Systems on the Southern Northwest Coast, Coos and Curry Counties, Oregon. Unpublished Ph.D. Dissertation, Washington State University, Pullman.

Drucker, Philip
1937 The Tolowa and Their Southwest Oregon Kin. In *American Archaeology and Ethnology* 36:221-300. University of California Publications.

Emmett, Robert L., Susan A. Hinton, Steven L. Stone and Mark E. Monaco

1991 *Distribution and Abundance of Fishes and Invertebrates in West Coast Estuaries, Volume II: species life history summaries.* Estuarine Living Marine Resources Report No. 8 National Oceanic and Atmospheric Administration/National Ocean Service Strategic Environmental Assessments Division, Rockville, MD.

Franklin, Jerry and C.T. Dyrness

1988 Natural Vegetation of Oregon and Washington. Oregon State University, Corvallis, OR.

Giles, Daniel

1971 Indian Wars, a Pioneer Struggles as told by the Late Daniel Giles. In *Pioneers and incidents of the Upper Coquille Valley,* edited by Alice H. Wooldridge, pp. 248-286. The Mail Printers, Myrtle Creek, Oregon.

Hall, Roberta

1995 *People of the Coquille Estuary: Native Uses of Resources on the Oregon Coast.* Words and Pictures Unlimited, Corvallis, OR.

1991 *The Coquille Indians: Yesterday, Todays, and Tomorrow* (restoration edition). Works and Pictures Unlimited, Corvallis, OR.

Hall, Robert, Loren Davis, and Dan Tupper

1992 Archaeological Testing of the Ferry Creek Waste Water Treatment Site, Bandon, Oregon 1992. Department of Anthropology, Oregon State University.

Harrington, John P.

1942 *Alsea, Siuslaw, Coos, Southwest Oregon Athapaskan: Vocabularies, Linguistic Notes, Ethnographic and Historical Notes.* John Peabody Herrington Papers, Alaska/Northwest Coast, in National Anthropological Archines, Smithsonian Institution, Washington D.C.

Johnson, Kim, Cristina Rodriquez-Franco, Heather Miller, and Christopher Sims

2021 Archaeological Testing for the Proposed 4.97-Acre Bandon Ridge Development, Bandon, Coos County, Oregon. PaleoWest, LLC, Portland, Oregon.

Lansing, William A. "Bill"

2020 The Mills that Built Coos Bay, Oregon and the Men Who Made it Happen. Bridge View Publishing, North Bend, Oregon.

Leatherman, Kenneth E and Alex D. Krieger

1940 Contributions to Oregon Coast Prehistory. *American Antiquity* 6(1):19-28.

McConnaughe, Bayard and Evelyn McConnaughey

1986 Pacific Coast. Knopf, New York.

Orr, E.L., W.N. Orr, and E.M. Baldwin

1992 *Geology of Oregon* (fourth edition). Kendall/Hunt, Debuque, Iowa.

Parrish, Josiah L.
1854 Report to Joel Palmer, Superintendent of Indian Affairs, Oregon Territory. 1893 Executive Documents of the Senate of the United States Serial 3144 (25): 28-32. Government Printing Office, Washington, D.C.

Peterson, Emil R. and Alfred Powers
1977 *A Century of Coos and Curry: History of Southwest Oregon.* Coos-Curry Pioneer and Historical Association, Coquille, Oregon.

Pinyerd, David A.
2000 The Preservation of Pre-World War Two Coast Guard Architecture in Oregon. Unpublished Master's Thesis, University of Oregon, Eugene.

Robbins, William G.
1988 *Hard Times in Paradise: Coos Bay Oregon, 1850-1986.* University of Washington Press, Seattle and Washington.

Ross, Richard
1976 Archaeological Survey of State Parks Lands along the Oregon Coast. Department of Anthropology Oregon State University, Corvallis, OR.

Sapir, Edward
1909 Takelma Text. *Anthropological Publications* 2. University of Pennsylvania.

1907 Notes on the Takelma Indians of Southwestern Oregon. *American Anthropologist* 9(2):251-275.

Sensabaugh, Carroll and Bill Smith
n.d. History of the Mill Site at Bullard's Bridge. Manuscript on file, Bandon Historical Museum.

Tveskov, Mark Axel
2021 *Results of the Archaeological Subsurface Testing at the Gunter House Site Garage 35CS115, Coos County, Oregon.* Report MT 2021.05. Black Dog Archaeology, Medford, Oregon.

2007 Social Identity and Culture Change on the Southern Northwest Coast. *American Anthropologist* 109(3):431-441.

2002 The Cultural Geography of the Coos and Coquille. In *Changing Landscapes: Proceedings of the 5th and 6th Annual Coquille Cultural Preservation Conferences*, edited by Donald B. Ivy and R. Scott Byram, pp.139-160. The Coquille Indian Tribe, North Bend, OR.

2000 The Coos and Coquille: A Northwest Coast Historical Anthropology. Unpublished Ph. D dissertation, Department of Anthropology, University of Oregon, Eugene, OR.

Tveskov, Mark and Amie Cohen
2007 Ni-Les'Tun Archaeology: The Bussmann, Blue Barn, an Old Town Bandon Sites. SOULA Research Report 2007-1. Southern Oregon University, Ashland Oregon.

2006 The Archaeology of the Western Cascades of Southwest Oregon. Southern Oregon University Laboratory of Anthropology Research Report 2006-2, Ashland, OR.

Tveskov, Mark, Katie Johnson, Andrew Bastier, and Daniel Meyers

2017 Results of the Archaeological Subsurface Testing at the Gunter House Site (35S115), Coos County, Oregon. SOULA Research Report 2015.8

Vogel, Betty L.

1993 Early Commercial Development, Bandon, Oregon: Block 1 of the Averill Addition, 1886-1936. Unpublished MA thesis, Interdisciplinary Studies, Oregon State University, Corvallis.

Walling, A.G.

1884 *History of Southern Oregon, Comprising Jackson, Josephine, Douglas, Curry, and Coos Counties.* Printing and Lithographing House of A.G. Walling, Portland, OR.

Ward, Beverly

1986 *White Moccasins.* Myrtle Point Printing, Myrtle Point, OR.

Wasson, George B. Jr.

2001 Growing up Indian: An Emic Perspective. Unpublished Ph. D dissertation, Department of Anthropology, University of Oregon, Eugene, OR.

Waterman, Thomas

1921 Athapascan Indian of Southwestern Oregon and Northwestern California. Manuscript No. 3183 in National Anthropological Archives, Smithsonian Institution, Washington D.C.

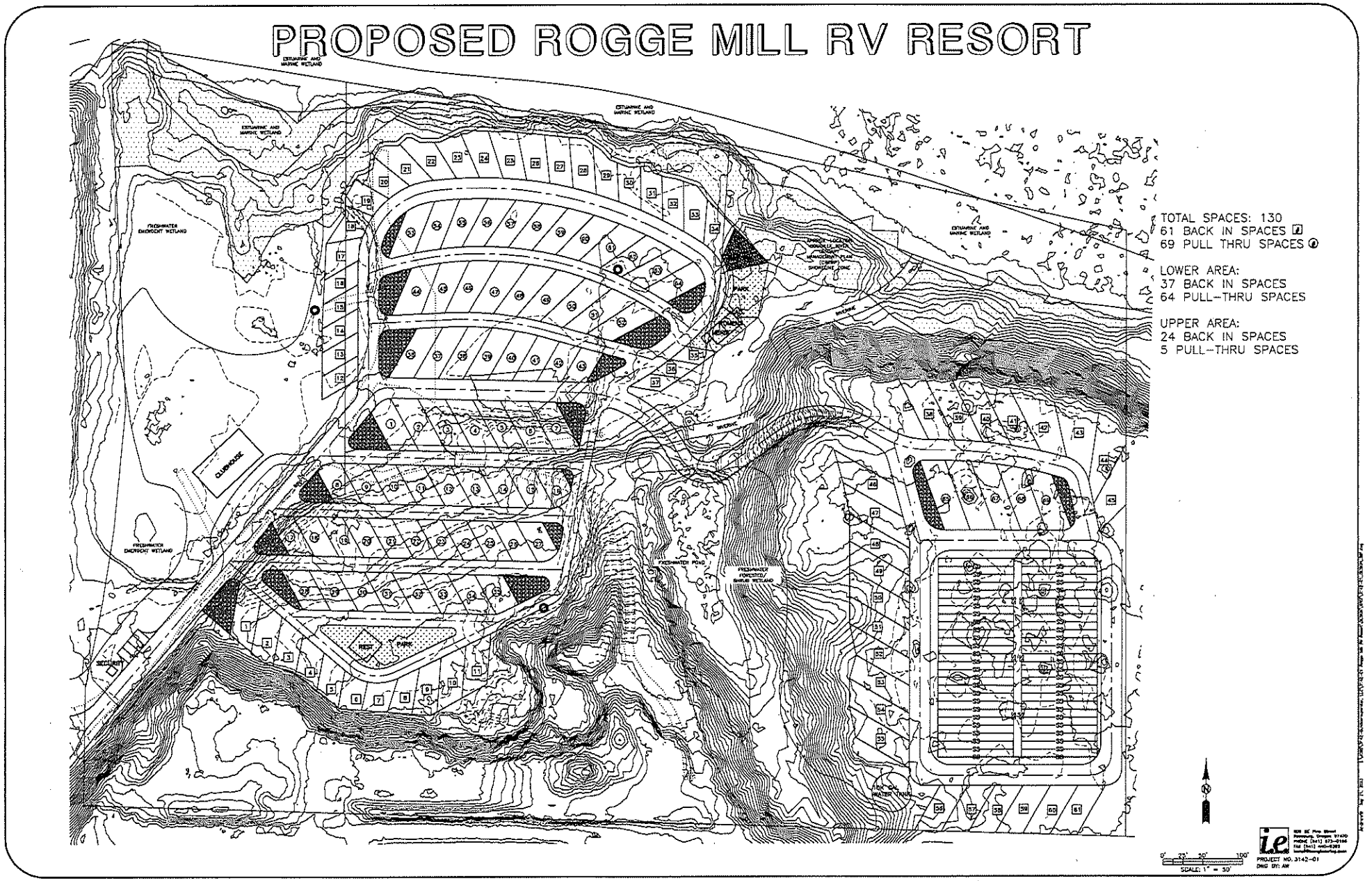
Wooldridge, Alice H.

1971 *Pioneers and Incidents of the Upper Coquille Valley, 1890-1940.* The Mail Printers, Myrtle Point, Oregon.

Younker, Jason

2003 Coquille/Ko'kwel, a Southwest Oregon Indian Tribe: Understating History, Culture, and Context in Revitalization. Unpublished Ph. D dissertation, Department of Anthropology, University of Oregon, Eugene, OR.

APPENDIX A. DRAFT PLANS FOR PROPERTY DEVELOPMENT


PROPOSED ROGGE MILL RV RESORT
TOTAL SPACES: 130
61 BACK IN SPACES
69 PULL THRU SPACES
LOWER AREA:
37 BACK IN SPACES
64 PULL-THRU SPACES
UPPER AREA:
24 BACK IN SPACES
5 PULL-THRU SPACES
CLUBHOUSE
PARK
ESTUARINE AND MARINE WETLAND
FRESHWATER EMERGENT WETLAND
SCALE: 1" = 50'
PROJECT NO. 3142-01

SEPTIC SITE EVALUATION APPROVAL

DEQ
State of Oregon Department of Environmental Quality

Septic Site Evaluation Approval

246-23-000039-EVAL

DEQ Coos Bay Office
465 Elrod Ave
Coos Bay, OR 97420
541-269-2721
Fax: 541-269-7984
OnsiteCoosBay@deq.state.or.us
Website: oregon.gov/deq

Date Issued: 10/30/2023
Application status: Site Evaluation Approved
Work description: Rogge Mill RV Resort - Commercial Site Evaluation

Applicant: Paul Kennedy
Phone: 541-673-0538
Email: paul4kennedy@gmail.com

Owner: OUTDOORSUPERSTAR LLC
Property address: 0 Hwy 101 Hwy, Bandon, OR 97411

Address: 4698 BLUEBELLE WAY
SPRINGFIELD OR 97478

Parcel: 28S14W17C1000 - Primary	Township:	28S	Range:	14W	Section:	17
	Township:	28S	Range:	14W	Section:	17
	Township:	28S	Range:	14W	Section:	17

Lot size: 4.42 acres
Zoning: N/A
Water supply: Well
City/County/UGB: County
County: Coos
Directions to Property: corner of Hwy 101 and Coquille Bridge just north of Bandon

Proposed use of structure: 130 space RV Park
Category of construction: Commercial

General Specifications

Max peak design flow: 18500 gpd.
Min septic tank volume: 40000 gal.
Special tank reqmts: Minimum sizing: two times the proposed peak design flow.
Media depth: 36 in.
Proposed gallons per day: 18500 gpd.
Min dosing tank volume: 3000 gal.

System Specifications	***Initial System***	***Replacement Area***
System type:	Alternative Treatment Technology (ATTs)	Alternative Treatment Technology (ATTs)
ATT description:	TBD	TBD
System distribution type:	Equal	Equal
Distribution method:	Pressurized	Pressurized

Trench Specifications	***Initial System***	***Replacement Area***
Max depth:	7 in.	7 in.
Min depth:	0 in.	0 in.

Special Requirements	***Initial System***	***Replacement Area***

CALL BEFORE YOU DIG...IT'S THE LAW

ATTENTION:Oregon law requires you to follow rules adopted by the Oregon Utility Notification Center. Those rules are set forth by Oregon Administration Rules. You may obtain copies of the rules by calling the center. (Note: The telephone number for the Oregon Utility Notification Center is 1-800-332-2344.)

Date issued: 10/30/2023
Application status: Site Evaluation Approved
Work description: Rogge Mill RV Resort - Commercial Site Evaluation

Groundwater type:	Temporary	Temporary
Groundwater depth:	31 in.	31 in.
Drainfield type:	Bottomless Sand Filter	Bottomless Sand Filter
Pump to drainfield required:	Yes	Yes
Other special requirement:	Dry Weather Install Required	Dry Weather Install Required
Bottomless Sand Filter:	10300 square ft.	10300 square ft.

THIS IS NOT YOUR PERMIT. A Construction/Installation permit is required before you construct your system. Please contact this office when you are ready to apply for a construction/installation permit. We cannot sign off on any Building Codes forms until we issue your permit.

This site approval runs with the land and will automatically benefit subsequent owners. This site approval is valid until the approved system is constructed under a DEQ construction permit or unless the site is altered without approval from this office. Alterations/excavations/lot line adjustments made to the site, or placement of wells or utilities, etc., may invalidate this approval

If you disagree with the decision of this report, you may apply for a site evaluation report review. The application for a site evaluation report review must be submitted to DEQ in writing within 60 days after the site evaluation report issue date and must include the site evaluation review fee in OAR 340-071-0140 Table 9A. A senior DEQ staff person will be assigned the site evaluation report review application.

You may apply for a variance to the onsite wastewater treatment system rules. The variance application must include a copy of the site evaluation report, plans and specifications for the proposed system, specify the rule(s) to which a variance is being requested, demonstrate the variance is warranted, and include the variance fee in OAR 340-071-140 Table 9C. A variance may only be granted if the variance officer determines that strict compliance with a rule is inappropriate or special physical conditions render strict compliance unreasonable, burdensome or impractical. A senior DEQ variance officer will be assigned the variance application.

Greg Alton	Regional Onsite Wastewater Specialist	10/30/23

SITE ECOLOGY SCOPING REPORT

CASCADIA GEOSERVICES, INC.
190 6th Street
PO Box 1026
Port Orford, Oregon 97465
D. 541-332-0433
C.541-655-0021
Email: info@cascadiageoservices.com
Www: cascadiageoservices.com

LEVEL I - SITE ECOLOGY SCOPING REPORT

For
Rogge Planner Facility
Highway 101, Bandon, Oregon
Coos County Tax Lots No 28 14 17C-1000, 1001

ECSI No: #6048

Date: June 27, 2016

Prepared For:
JGE Properties, LLC
M Ed Eckes
61645 Edward Mill Road
Coos Bay, OR 97420
541-290-4338

Prepared By:
CASCADIA GEOSERVICES, INC.
190 6th Street
PO Box 1026
Port Orford, Oregon 97465
D. 541-332-0433

Introduction

Cascadia Geoservices, Inc. (CGS) is pleased to submit this Level I - Site Ecology Scoping Report on behalf of JGE Properties, LLC in Coos Bay, Oregon for the former Rogge Mill Site property located in Coos County, Oregon (subject property or site). CGS is working with DEQ through their Voluntary Cleanup Program (VCP) in order to obtain Regulatory Closure for this site. This report was requested by DEQ on May 27, 2016 and is based on two site visits to the Rogge Mill Site property on June 9, 2016 and on June 15, 2016. This Level I - Site Ecology Scoping Report follows DEQ's Attachment 3 from their Guidance for Ecological Risk Assessment publication[1]. The purpose for this study and report is to provide a conservative, qualitative determination of whether there is any reason to believe that ecological receptors and /or exposure pathways are present or potentially present at or in the locality of the facility.

In addition, we are providing DEQ with information that they requested regarding the water well which is located on the property (COOS 53925). And, we are including an expanded table of Contaminants of Interest (COI) which includes the results of sampling conducted on May 17, 2015.

LEVEL I - SITE ECOLOGY SCOPING REPORT

EXISTING DATA SUMMARY

a. **Site Location:** The Rogge Mill Site (subject property or site) is located in Coos County, Oregon approximately .8 miles north of Bandon, Oregon (Figure 1, Site Location Map). The site is located on the south bank of the Coquille River 3.2 river miles inland from the mouth of the river and the Pacific Ocean.
b. **Site History:** The property was operated as a plywood, veneer, planner and cedar re-saw mill from 1952 until 1996 and as a cedar re-saw mill from 2000 to 2014.

[1] Oregon Department of Environmental Quality. April, 1998. Guidance for Ecological Risk Assessment: Level I, II, III, IV

c. **Site Current and Future Uses:** The site is currently vacant. The site is zoned by Coos County as both Recreational and Industrial (Figure 2, Zoning Map). The northern portion of the property is zoned CR16-IND (Coquille River Estuary Management Plan - Industrial Shore Land Segments (CREMP-IND). Coos County Zoning Ordinances permit industrial uses within this zone. The remainder of the property is zoned Q-REC (Recreational). Outright uses here include agricultural, golf courses, educational-associated facilities, fish and wildlife habitat management, hunting and fishing preserve, marinas, mitigation and recreation which includes boating, fishing and campgrounds. Single family dwellings and RV Parks may also be allowed but would require a site plan review by the county.

d. **Known or Suspected Hazardous Substance Releases:** On-going soil and groundwater sampling to date has been for Total Petroleum Hydrocarbons (TPH), Semi Volatile Organic Compounds (SOC), Volatile Organic Compounds (VOC), Metals and Dioxins/Furans. Our test results indicate that Pentachlorophenol (PCP), a synthetic organochlorine compound used to preserve wood, was used to treat lumber during the milling process. The highest concentration of PCP detected from our sampling was from a surface soil sample taken near the south side of the mill building adjacent to the paint storage area (Figure 3, Site Map). This sample exceeded limits provided by DEQ in their Risked Based Concentrations for Petroleum Contaminated Sites[2]. Sampling results for other contaminants including TPH, SOC, VOC, Metals and Total Petroleum Hydrocarbon, Volatile Organic Compounds, Metals and Dioxins/Furans indicates that these contaminants are present but generally in amounts less than the Risked Based Concentrations as determined by DEQ.

e. **Sensitive Environments:** The site borders the Coquille River within the River's Estuary. The bank of the river is home to a diverse population of both migratory

[2] State of Oregon Department of Environmental Quality Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites, 2003

and non-migratory shore birds, amphibians and invertebrates. The river is home to a variety of fish including Oregon Coast Coho, (Oncorhynchus kisutch), a salmonid which was federally listed as threatened on June 20, 2011. The north side of the Coquille River across the river from the site is part of the US Fish and Wildlife's Bandon Marsh Refuge (Figure 4, USFW Bandon Marsh Refuge Map) which is also home to a variety of plants and animals.

f. **Threatened or Endangered Species:** The Coquille River is populated by wild Coho Salmon. Coho Salmon have been under close scientific inspection and strict harvest management for years due to decreasing populations. In June, 2011, National Oceanic and Atmospheric Administration (NOAA) Fisheries listed the Oregon Coast Coho as threatened. Across the river to the north and to the west of the site is the US Fish and Wildlife's (USFW) Bandon Marsh Wildlife Refuge. USFW has recently removed flood control dikes and planted native vegetation in the Refuge north of the site in order to restore the salt marshes and to improve and increase the breeding habitat of the Coho Salmon.

Other plants and animals which are currently listed as either threatened or endangered and which occur within the Bandon Marsh Wildlife Refuge and Coquille Estuary include the Silvery phacelia (Phacelia argentea); Short-stemmed sedge (Carex brevicaulis), Western snowy plover (Charadrius alexandrinus nivosus); Yellow sandverbena (Abronia latifolia) ringtail (Bassariscus astutus) and northern bog clubmoss (Lycopodiella inundata). None of these species has been identified on the site.

SITE VISIT SUMMARY

As part of this Level 1–Site Ecology Scoping Report, a site visit was conducted on Monday, June 9, 2016. This was followed by a second site visit on June 15, 20916. The site visit was conducted during early summer when ecological features are most apparent. As part of that site visit, an Ecological Scoping Checklist was filled out and is attached here as Attachment 1.

a. **Contaminants of Interest:** Table 1 lists the Contaminants of Interest (COI) for the site. This list was generated based on known contaminants associated with wood processing facilities based on EPA's Sector Notebook [3].It is also based on discussions with and guidance from DEQ personnel and on our two sampling events on May 7, 2015 and March 16, 2016. Following is a summary of the COI;

   1. Sampling of both soils and groundwater returned metal values which were generally below background values provided by DEQ[4] for the Klamath Mountain and Coast Range Physiographic Regions of southwestern Oregon. Based on this, metals are not considered Contaminants of Interest.

   2. Where detected, Hydrocarbons, Volatile Organic Compounds and Semi Volatile Compounds returned values which are less than the All Risked-Based Concentrations (RBC) for Individual Chemicals as provided by DEQ[5]. For soils, these limits are based on soil ingestion, dermal contact and inhalation in a residential environment. Groundwater concentrations are based on limits for ingestion and inhalation from tap water in a residential environment.

   3. Two groundwater samples (GW-RP-050715_0900 and GW-RP-050715-1130 which were taken west and east of the mill building returned values which exceeded RBC's for Dioxins and Furans for residential groundwater. Sample GW-RP-050715_0900 was taken at 6 ft. bgs and returned a value of 4 PPM based on a Toxic Equivalency Factor (TEF) for the most toxic form of dioxin, 2,3,7,8-TCDD. Lab qualifiers for this sample state;

---

[3] EPA Office of Compliance Sector Notebook Project Profile of the Lumber and Wood Products Industry. September 1995. U.S. Environmental Protection Agency. SIC Code 24

[4] Development of Oregon Background Metals Concentrations in Soil. Technical Report March 2013. Oregon Department of Environmental Quality

[5] State of Oregon Department of Environmental Quality Risk-Based Decision Making for the Remediation of Petroleum-Contaminated Sites. 2003.

a. Result is less than the Reporting Limit (RL) but greater than or equal to the Method Detection Limit (MDL) and the concentration is an approximate value.
b. The reported result is the estimated maximum possible concentration of this analyte, quantitated using the theoretical ion ratio. The measured ion ratio does not meet qualitative identification criteria and indicates a possible interference.
c. Compound was found in the blank and sample.
d. The reported quantitation limit has been raised due to an exhibited elevated noise or matrix interference

We note that no other COI was reported from this groundwater sample. Based on this and the fact that the analyte was also detected in the blank, the sample results for this sample are considered erroneous and due to either lab error or to contamination during shipping and handling.

4. Similarly, groundwater sample GW-RP-050715-1130 which was taken east of the mill building at a depth of 4 feet returned a value of 282 PPM TEF for dioxin, 2,3,7,8-TCDD. The lab qualifier for this sample was
   a. Compound was found in the blank and sample.
   b. The reported quantitation limit has been raised due to an exhibited elevated noise or matrix interference

   We note that all other COI's for this sample were below Risked Based Concentrations. Because of this and the fact that the compound was found in the blank and sample and that the lab noted that there was elevated noise or matrix interference, the sample results for this sample are also considered erroneous and due to either a lab error or to contamination during shipping and handling.

As discussed, our test results indicate that Pentachlorophenol, a wood preservative, is the primary Contaminant of Interest. The highest concentration of Pentachlorophenol

was from a surface soil sample which was taken near the south side of the mill building adjacent to the paint storage area (Figure 3, Site Map).

b. Observed Impacts

During our site visit, we did not observe any visual or detect any olfactory indication of chemical release. This included sheening or other indication of chemicals either on the ground surface or surface water. There are areas inside the mill building where darkened areas on the concrete slab indicate past spills. These appear to be isolated and did not release onto the adjoining areas around the spill.

Graveled parking areas and roadways had less vegetation due to compacted gravel placed during operation of the mill. We observed no areas of distressed vegetation (other than on the roadways and parking areas) and no areas where the vegetation was visibly distressed due to chemical contamination of the soils.

Likewise, surface water which is draining from Eagle Springs via diversion ditches appears clear and supports both amphibians and aquatic insects.

Ecological Features

Areas adjacent to the west, east, north and south sides of the mill building were covered with dense vegetation which consisted primarily of grasses and shrubs (Photos 1 through 6). Approximately 15% of the site is wooded with willows. These are almost exclusively along the banks of the Coquille River (Photo 7). The bushes are similar in age and are generally a maximum of 4 inches at breast height. Alders exist south of the mill building along the base of the foothills near Eagle Springs.

Re-routing of surface water from Eagle Springs has formed drainage ditches with areas of standing water along the west, south and east side of the mill building (Figure 3, Site Map). A combination of grasses, flowering and non-flowering vegetation is present in these areas (Photo 8, 9 and 10). Within these ditches,

amphibians and insects were observed (Photo 11 and 12). These are primarily within the western draining ditches with few observed in the eastern drainage ditches east of the mill building.

The bank of the Coquille River northwest and northeast of the mill building was observed to have stands of willows and a few other deciduous trees and shrubs. Exotic plants (primarily gorse and Himalayan Blackberries) cover much of the river bank (Photo 13). These appeared to be growing vigorously with no signs of distress due to chemical contamination. The base of the retaining wall along the river bank is within the tidal fluctuation zone of the Coquille River Estuary. The sediment in the tidal zone and the wooden piles placed during operation of the mill are covered with aquatic mosses (Photos 14).

Starling (Sturnus vulgaris) were observed nesting under the eaves of the mill building (Photos 15) and we infer that these birds are feeding on insects hatched from the standing water. A feral cat was observed briefly in the grass outside of the mill building. Cat scat was observed to have fur which indicates that there are small mammals present on the site (Photos 16). Shore birds were observed flying over the site but there was no indication that these were nesting at the site.

c. Ecologically Important Species/Habitats

There are no known important species/habitat on the subject properly. The property lies south and east of the USFW Bandon Marsh Wildlife Refuge.

d. Threatened and/or Endangered Species

There are no known threatened and/or endangered species on the site. As discussed, the site is south and east of the USFW Bandon Marsh Wildlife Refuge. Plants and animals which are currently listed as either threatened or endangered and which occur within the Bandon Marsh Wildlife Refuge and Coquille Estuary include the Oregon Coast Coho, Silvery phacella (Phacelia argentea); Short-stemmed sedge (Carex brevicaulis), Western snowy plover (Charadrius alexandrinus nivosus); Yellow sandverbena (Abronia latifolia)

ringtail (Bassariscus astutus) and northern bog clubmoss (Lycopodiella inundata). None of these species was observed on the site. The entire site has been used as a mill/industrial site and has undergone frequent anthropogenic disturbance and alteration over the last 60 years

e. Threatened or Endangered Species Habitat

There are no known threatened and/or endangered species habitat on the site.

f. Exposure Pathways

Based on surface soils and groundwater sampling, Pentachlorophenol is present in surface soils and near surface groundwater south of the mill building and in groundwater in the yard east of the mill building. Concentrations in groundwater were determined to be .35 to .37 PPB as compared to .044 PPB for residential drinking water. A soil sample taken from the area south of the mill building returned a value of 1900 PPB (1.9 PPM) compared to 1.0 PPM for RBC in residential soils.

Exposure pathways for the Pentachlorophenol is by surface water and near surface ground water. Drainage ditches excavated to drain the water from Eagle Springs forms ditches and standing water on the south, west and east side of the mill building. Both drainage ditches drain north to the Coquille River.

A report provided by USFW dealing with Pentachlorophenol Hazards to Fish, Wildlife and Invertebrates[6] states that;

For protection of aquatic life, it is recommended that the PCP water concentration not exceed 3.2 ug/l; but even at this level certain species

[6] Eisler, Ronald. April 1989. PENTACHLOROPHENOL HAZARDS TO FISH, WILDLIFE AND INVERTEBRATES: A SYNOPTIC REVIEW. U.S. Fish and Wildlife Service Biological Report 85(1.17) Contaminant Hazard Reviews Report No. 17

> ***of fishes and oysters accumulate enough of the toxicant to retard their growth.***
>
> We note that our groundwater samples taken south of the mill building, east of the mill building and near the bank of the river east of the mill building systematically returned values of .30 to .35 PPB for Pentachlorophenol which is significantly lower than the values provided by the USFW.
>
> A soil sample taken from the area south of the mill building returned a value of 1900 PPB (1.9 PPM) compared to 1.0 PPM for Risked-Based Concentrations in residential soils. The USFW report further goes on to state that;
>
> **In sensitive aquatic species, PCP adversely affected growth, survival, and reproduction at media concentrations of 8 to 80 ug PCP/1 in algae and higher plants, at 3 to 100 ug/l in invertebrates, and 3,580 mg/kg in the diet, and >285 mg/kg in contaminated nesting materials .(i.e., wood shavings).**

We believe that exposure pathways of the Pentachlorophenol to the Coho Salmon within the Coquille River do exist but that the concentrations are less than those determined as harmful to fish by USFW. These concentrations in the near surface groundwater are further diluted due to mixing with the river water. The fish are migratory and leave the river after a year in the estuary. During the summer months, water levels from Eagle Springs are low and therefore less water is entering the river. Further, Pentachlorophenol is rapidly accumulated and rapidly excreted, and has little tendency to persist in living organisms; it is readily degraded in the environment by chemical, microbiological, and photochemical processes.

Based on this, it is our opinion that no further ecological assessment of the site is warranted.

<u>On Site Water Well</u>

Coos Water Well (COOS 53925) is located on the west side of the of the mill property approximately 248 feet west of the mill building and is shown on Figure 2, Site Reconnaissance Map. The well was completed in June 13, 2013 to a depth of 67.16 feet

below ground surface (bgs) (Attachment 1, Well Card Coos 53925). Water was first encountered in the well at 12 ft. bgs. The well was cased with 5 inch diameter plastic casing to a depth of 62.16 feet bgs.

Based on our discussion with you on May 27th, we agree that because of the location of the site within the Coquille River Estuary, near surface groundwater is tidally influenced and, as such, may be brackish and unsuitable for human consumption. We infer that this is the reason that the existing well was drilled to 67 ft. bgs. Because of this, we believe that a Deed Notice could be used to alert future owners of the site that any a drilled well constructed on the site should be deepened to a minimum of 50 feet bgs and be cased. This would help to prevent future groundwater wells which are developed on the site from being effected by potential surface contamination.

Sincerely,
Cascadia Geoservices, Inc.

CERTIFIED
OREGON
ENGINEERING GEOLOGIST

Eric T. Oberbeck
2016.06.27
20:11:07 -07'00'

Expires May 31, 2017

Photos

Figures

Figure 1, Location Map

Figure 2, Zoning Map

Figure 3, Site Reconnaissance Map

Figure 4, USFW Bandon Marsh Refuge Map

Tables

Table 1, Soil and Groundwater Samples and Results, May 7, 2015

Table 2, Soil and Groundwater Samples and Results, March 16, 2016

Table 3, Toxic Equivalency Factor (TEF) for Dioxin, 2,3,7,8-TCDD

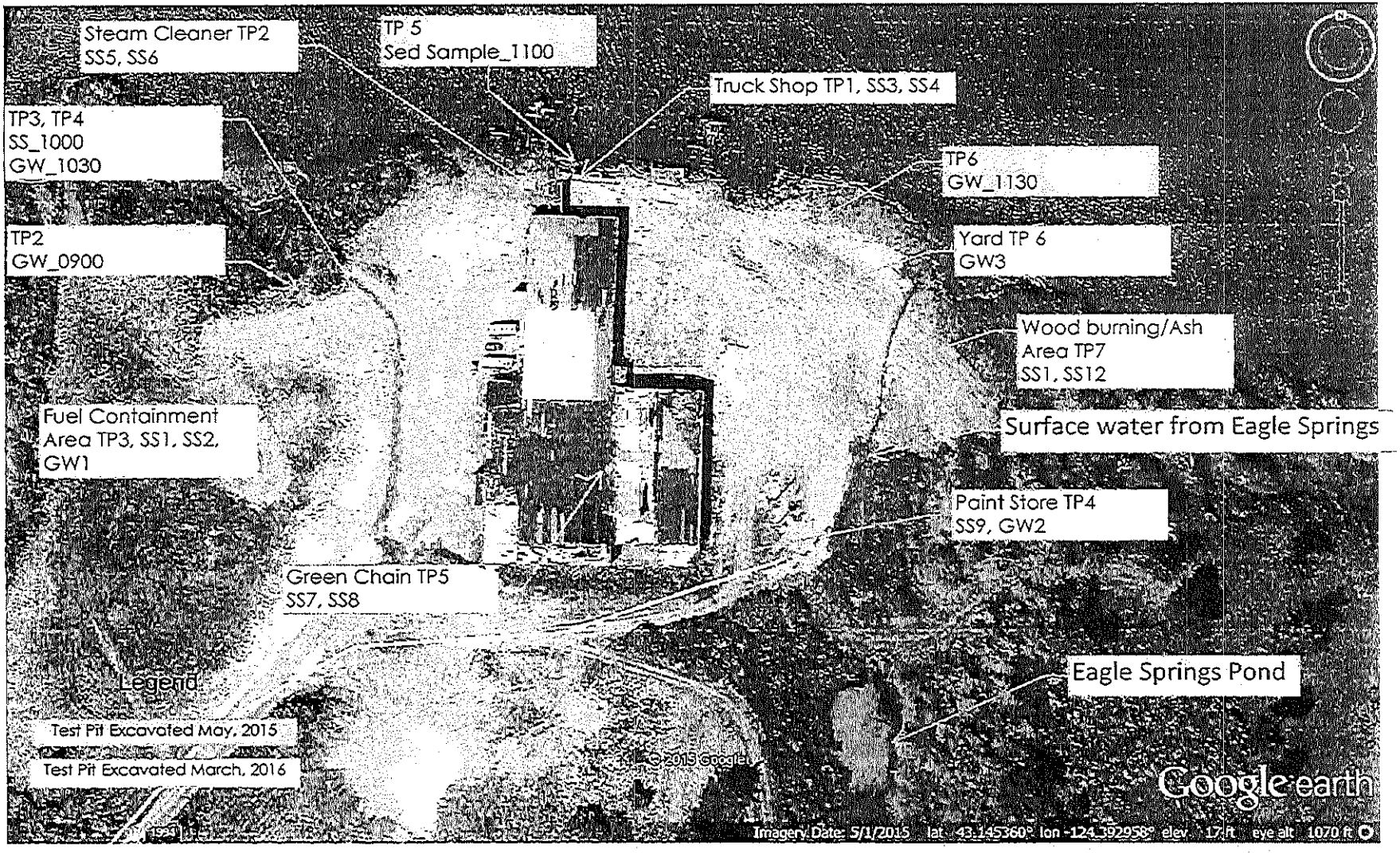
Attachments

Ecological Scoping Checklist

Oregon Well Log

Table 3, Toxic Equivalency Factor (TEF) for the Dioxin, 2,3,7,8-TCDD

GW_0900	TEF	Value	Converted Equiv. Value	Comments
2,3,7,8_TCDD	1	0	0	May be interference
1,2,3,7,8-PeCDD	1	2.6	2.6	May be interference
1,2,3,4,7,8-HxCDD	0.1	3.7	0.37	May be interference
1,2,3,6,7,8-HxCDD	0.1	6	0.6	May be interference
1,2,3,7,8,9-HxCDD	0.1	2.8	0.28	May be interference
1,2,3,4,6,7,8-HpCDD	0.01	12	0.12	May be interference
OCDD	0.0003	56	0.0168	May be interference
			4.0	TOTAL
S_1100				
2,3,7,8_TCDD	1	0.31	0.31	May be interference
1,2,3,7,8-PeCDD	1	1.3	1.3	May be interference
1,2,3,4,7,8-HxCDD	0.1	2.9	0.29	May be interference
1,2,3,6,7,8-HxCDD	0.1	31	3.1	May be interference
1,2,3,7,8,9-HxCDD	0.1	8.7	0.87	May be interference
1,2,3,4,6,7,8-HpCDD	0.01	1100	11	May be interference
OCDD	0.0003	7600	2.28	May be interference
			19.15	TOTAL
GW_1130				
2,3,7,8_TCDD	1	11	11	May be interference
1,2,3,7,8-PeCDD	1	76	76	May be interference
1,2,3,4,7,8-HxCDD	0.1	1800	180	May be interference
1,2,3,6,7,8-HxCDD	0.1	80	8	May be interference
1,2,3,7,8,9-HxCDD	0.1	72	7.2	May be interference
1,2,3,4,6,7,8-HpCDD	0.01	0	0	May be interference
OCDD	0.0003	21000	282.2	



N

CASCADIA GEOSERVICES	Project No: 15031 Date: May, 2016	**SITE RECONNASIANCE MAP** Rogge Property Highway 101 Bandon, Oregon	Figure 3

FLOOD RISK ASSESSMENT AND FLOODWAY ANALYSIS

TECHNICAL MEMORANDUM

WEST Consultants, Inc.
2601 25th St. SE
Suite 450
Salem, OR 97302-1286
(503) 485-5490
(503) 485-5491 Fax
www.westconsultants.com

WEST CONSULTANTS
WATER | ENVIRONMENTAL | SEDIMENTATION | TECHNOLOGY

Name: Mr. Ying Deng
Company: OutdoorSuperStar, LLC
Date: August 1, 2023
From: James Heyen, PE
Subject: Flood Risk Assessment and Floodway Analysis for the Lower Coquille River

---

Introduction

WEST Consultants, Inc. (WEST) has completed a flood risk assessment and floodway analysis of the lower Coquille River near Bandon, Oregon. The analysis was requested by Mr. Ying Deng in support of his ongoing permitting applications with Coos County for the proposed development of an RV park along the Oregon Coast Highway immediately adjacent to the left bank of the Coquille River. As the property in question lies within a FEMA 100-year Approximate Zone A floodplain, Coos County regulations require a detailed hydraulic analysis to establish the base flood elevation (BFE) for the 1% annual chance (100-year) flood event and determine the extents of a regulatory floodway. The results of the analysis will be used to ensure that the proposed development will be located outside of the floodway.

The proposed project lies within the floodplain of the Coquille River according to FEMA effective flood insurance rate map (FIRM) for Coos County number 41011C0494F, effective 12/07/2018. Figure 1 shows a map of the study area with an overlay of the effective FEMA flood hazard mapping and identifies the approximate location of the proposed development. All figures are presented Appendix A at the end of this memorandum. Unless otherwise specified, all elevations listed herein are referenced to the North American Vertical Datum of 1988 (NAVD88).

Hydraulic Modeling

The detailed hydraulic analysis was conducted using the River Analysis Software developed by the US Army Corps of Engineers Hydrologic Engineering Center (HEC-RAS), version 6.4.1. Because the project is located in a portion of the Coquille River only analyzed by approximate methods, the analysis developed a new hydraulic model of the study reach. The following sections describe the development of the detailed model and document the data sources.

Bathymetric and Topographic Data

Detailed bathymetry data for the lower Coquille River were obtained from a previous study conducted in 2010 for the Oregon Department of Transportation (ODOT). For that study, which developed hydraulic models to evaluate potential bridge scour at tidally influenced bridges, WH Pacific surveyed main channel cross sections in the vicinity of the Coquille River Bridge carrying US Route 101. Those data were collected in the Spring of 2010.

Topographic data, which covered all but the low flow channel of the river, were obtained from the "Southcoast" LiDAR dataset collected by the Oregon Department of Geology and Mineral Industries (DOGAMI) between April of 2008 and July of 2009.

The two data sources were mosaiced together to create a Terrain DEM of the river and overbanks for the project area. Figure 2 shows a map of the study area with the composite terrain consisting of topographic and bathymetric data.

Hydraulic Model Geometry

A total of fourteen cross sections were extracted from the terrain DEM to build the hydraulic model geometry and are shown in Figure 3. The river thalweg was used to create the model centerline upon which cross section river stationing and main channel downstream reach lengths were based. Left and right overbank flow paths were estimated from the terrain DEM and used to establish overbank downstream reach lengths.

Bridge data for the Coquille River Bridge carrying US Route 101 were imported from the 2010 ODOT study and confirmed by comparing them with as-built plans. The bridge is supported by eight piers and has sloping abutments at both ends.

Manning's roughness values were estimated from values listed in the effective FEMA Flood Insurance Study (FIS) for Coos County, which lists ranges of values employed by flooding source. While the downstream end of the Coquille River was not studied by detailed methods, the portion of the river studied by detailed methods begins near the community of Riverton, approximately 12 miles upstream from the Coquille River Bridge. The FIS lists Manning's roughness values for the Coquille detailed analysis of 0.03 in the main channel and between 0.03 and 0.08 in the overbanks. A main channel Manning's roughness value of 0.028 and overbank values ranging between 0.036 and 0.1 were applied based on examination of aerial photography and comparison with similar Southern Oregon coastal rivers.

Hydrology and Boundary Conditions

Discharge for the 1% annual chance flood on the Coquille River, 122,000 cfs at the confluence with the Pacific Ocean, was obtained from the effective FIS.

The downstream boundary condition for the lower Coquille River is highly influenced by tidal action. FEMA guidelines specify that when the downstream boundary of a model is within a coastal tidal reach, the tidal boundary of the model is taken as equal to the Mean Higher High Water (MHHW) level of the nearest tidal station. NOAA station 9432373 (Bandon, Coquille River OR) is the nearest tidal station, and records

indicate a MHHW elevation of 6.99 feet NAVD88. This value was used as the downstream boundary condition for the HEC-RAS model plan "without floodway" conditions.

Floodway Encroachment Analysis

A plan was created to model the "with floodway" conditions. The discharge for the 1% annual chance flood was retained – 122,000 cfs. FEMA guidelines specify that the downstream boundary condition for the "with floodway" condition be set to normal depth with the same energy grade slope as the "without floodway" condition. That slope was determined to be 0.001 and was set for the "with floodway" condition.

Encroachment stations were iteratively varied through the study reach until a floodway with a maximum surcharge of less than 1.0 feet was established while not encroaching within the bank stations and while retaining reasonable top width transitions between cross sections. The floodway analysis also considered the reasonableness of the computed floodway once transferred to a map. For this reach, it was found that encroachments up to the bank stations resulted in surcharges of less than one foot at all cross sections.

Analysis Results

The hydraulic analysis determined the water surface elevations for regulatory, without floodway, and with floodway conditions for a 1% annual-chance event along the lower Coquille River. Table 1 on the following page shows the detailed hydraulic modeling results.

The proposed project location is within the portion of the lower Coquille River influenced by backwater from coastal flooding. The effective FIS summary of elevations lists a BFE of 15.2', but the effective FIRM shows a BFE of 16.0'. We recommend the proposed development consider the BFE to be the more conservative value of 16.0'.

Figure 4 shows a map of the computed floodway along the lower Coquille, with a close-up view of the proposed development site. Inundation extents, shown in blue, in Figure 4 are for a static 16.0' BFE.

Table 1 – Hydraulic Analysis Results

	Floodway			1% Annual-Chance Flood Water Surface Elevation			
River Station	Width	Area	Mean Vel.	Regulatory	w/o Floodway	w/ Floodway	Increase
(ft)	(ft)	(sq-ft)	(ft/sec)	(ft)	(ft)	(ft)	(ft)
1,200	1,141	13,875	8.79	16.0	6.99	7.23	0.24
2,400	1,212	16,775	7.27	16.0	8.19	8.54	0.35
3,600	1,233	17,765	6.87	16.0	8.81	9.27	0.46
4,800	1,328	18,886	6.46	16.0	9.29	9.92	0.63
6,000	1,170	17,514	6.97	16.0	9.70	10.39	0.69
7,200	1,011	16,844	7.24	16.0	10.11	10.9	0.79
8,400	943	16,280	7.49	16.0	10.61	11.4	0.79
9,600	990	16,900	7.22	16.0	11.17	12	0.83
10,525	708	14,989	8.14	16.0	11.48	12.28	0.8
10,721	663	15,156	8.05	16.0	11.81	12.57	0.76
11,007	706	14,941	8.17	16.0	11.96	12.67	0.71
12,000	678	14,536	8.39	16.0	12.60	13.05	0.45
13,200	662	13,759	8.87	16.0	13.22	13.52	0.3
14,400	617	14,244	8.56	16.0	13.66	14.16	0.5

If you have any questions regarding the analysis results or methodology, please feel free to contact me at (503) 485-5490 or jheyen@westconsultants.com.

Appendix A
Figures

Figure 1 - Study Area with Overlay of Effective Flood Hazard Mapping

Figure 2 – Composite Terrain of Topography and Bathymetry

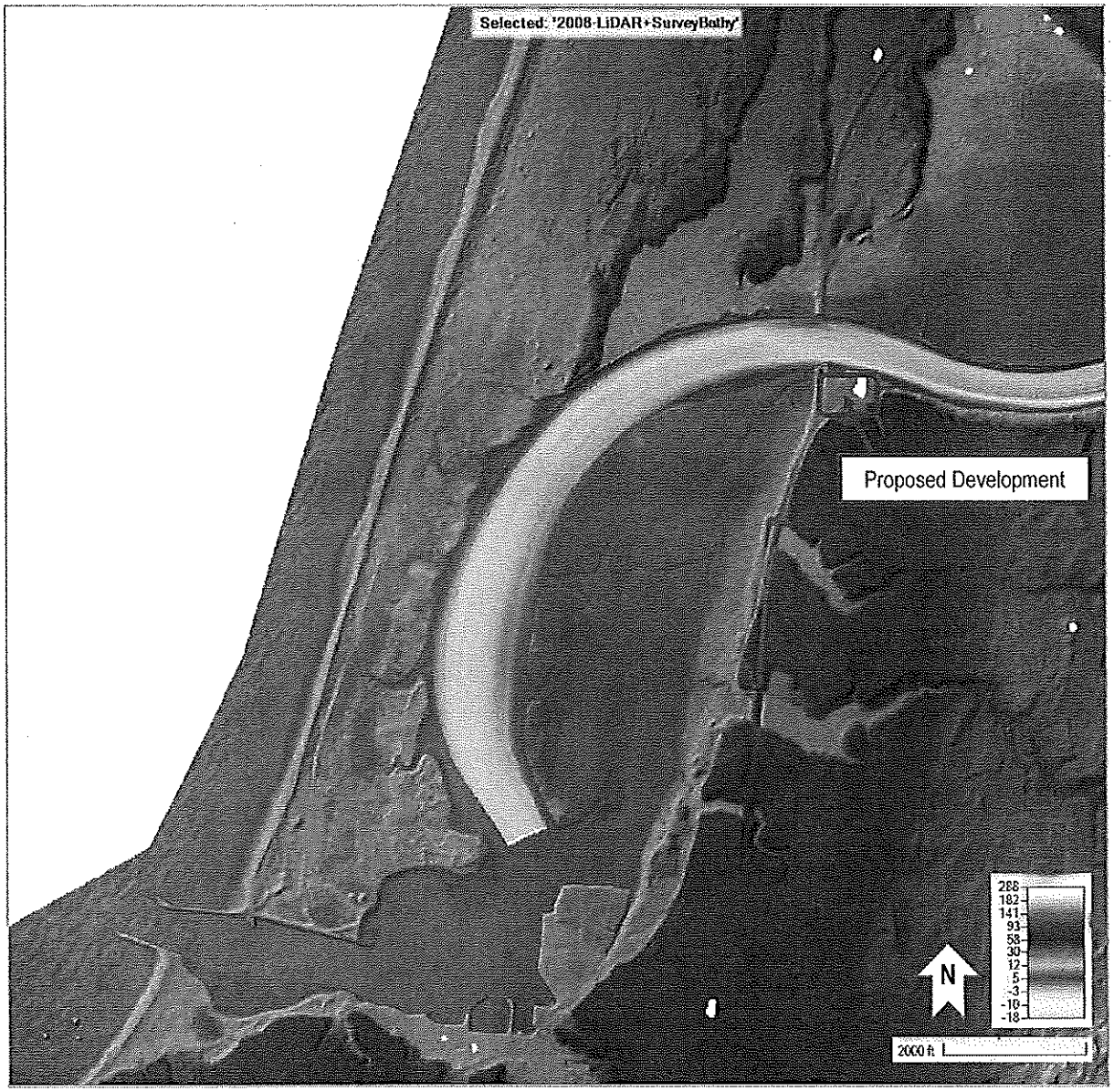


Figure 3 - Hydraulic Model Cross Sections

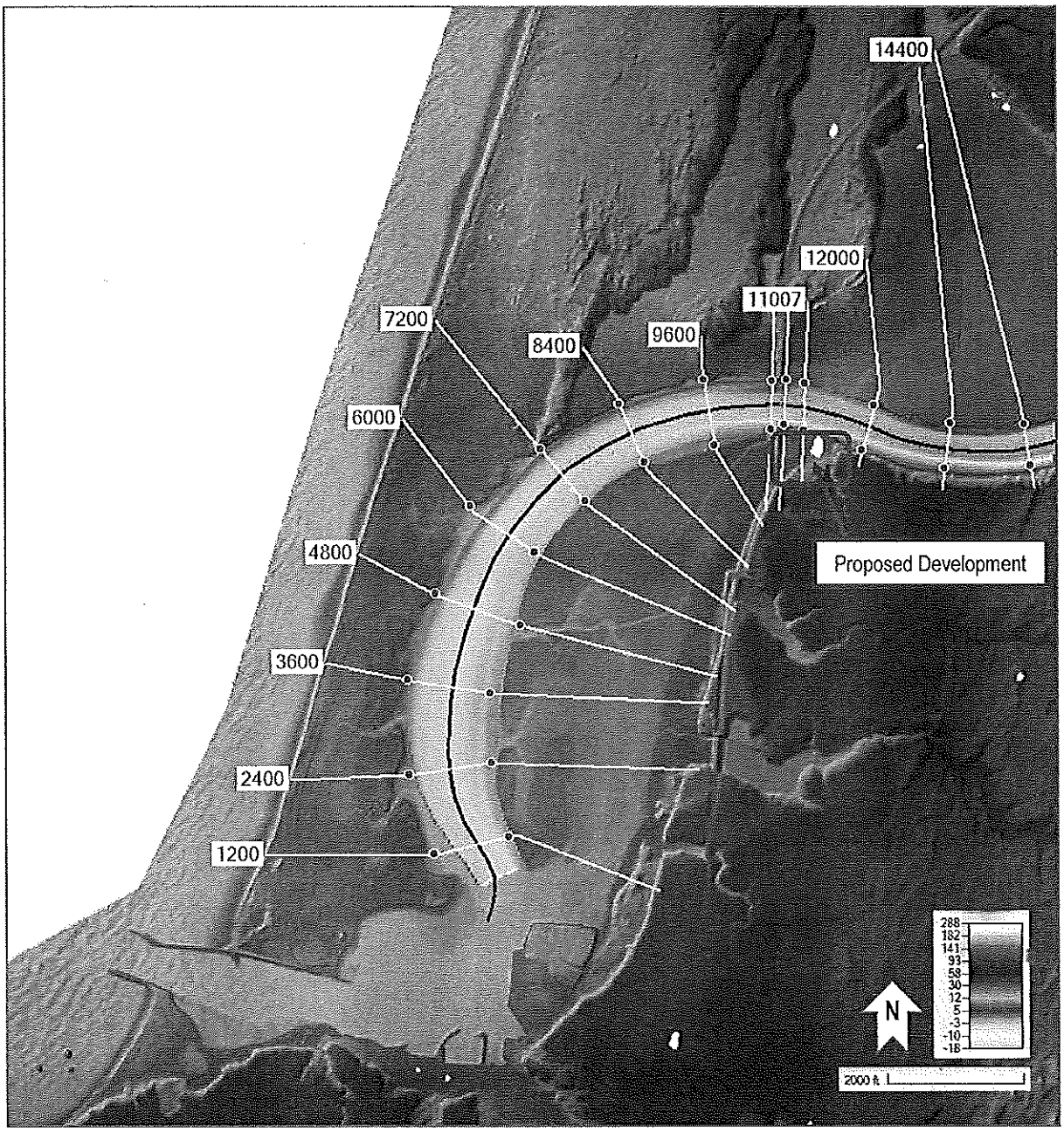
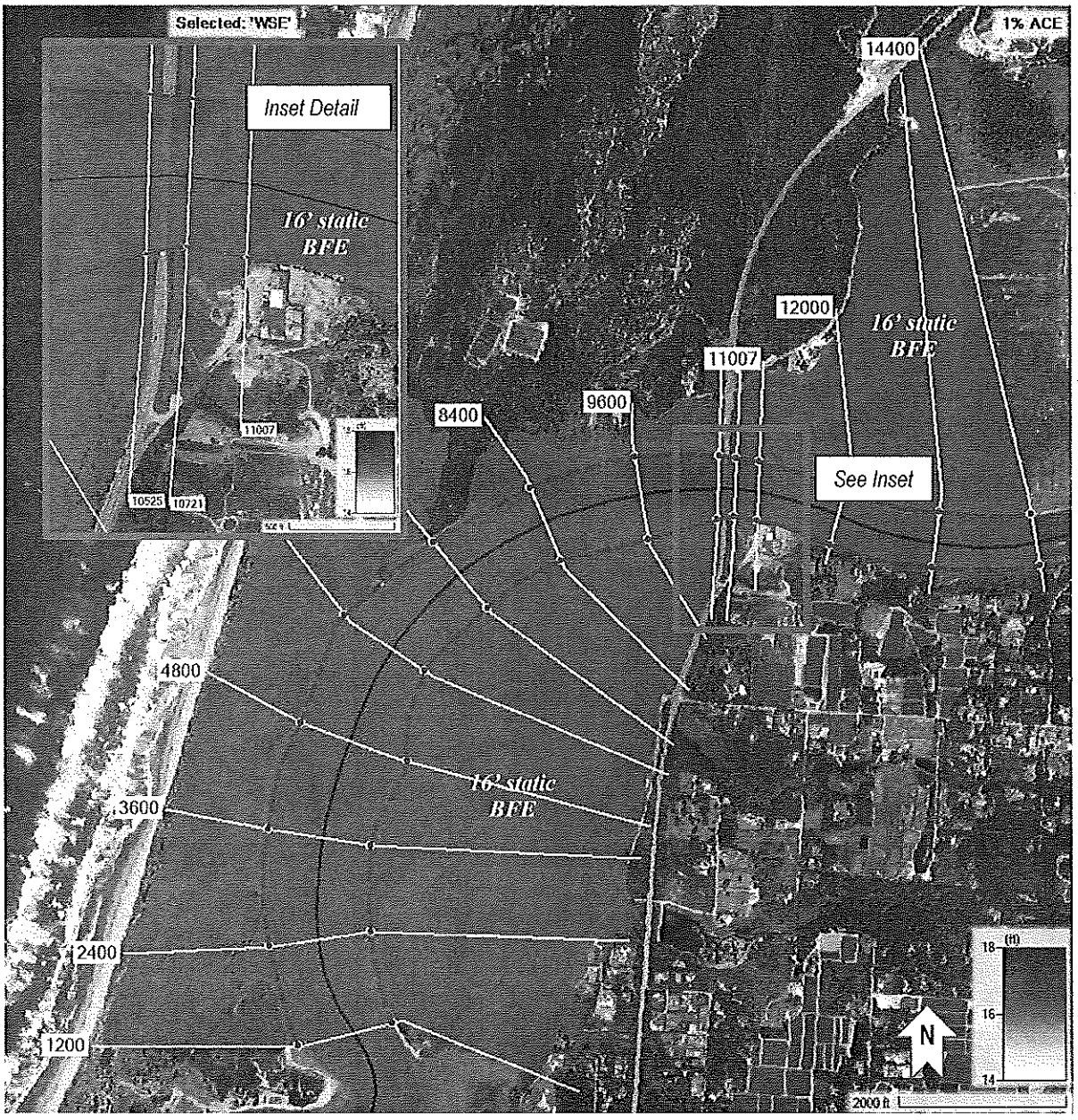


Figure 4 – Floodway Limits and Approximate Base Flood Inundation Extents



SEWER, STORMWATER AND DRAINAGE MEMOS

civil
structural
surveying
architecture
planning

809 SE Pine St
Roseburg, OR 97470

ieengineering.com
541.673.0166

MEMO

To: Coos County Planning Department

From: Derek Miller, P.E.

cc:

Date: 9-29-2023

Re: Rogge Mill RV Resort – Site Drainage Memo

This memo, in conjunction with the exhibit labeled "Preliminary Rogge Mill RV Drainage Plan", discusses the existing drainage conditions and the strategies that will be used moving forward to design the storm drainage infrastructure that will serve the proposed 130-unit RV Resort.

Existing Site Drainage

Currently there is no existing storm drainage system present at this site even though it was a developed logging mill site with impervious areas in its previous use. Stormwater runoff from the site currently either sheet flows directly into the Coquille River or sheet flows into existing seasonal drainage ditches that eventually outfall into the Coquille River. A portion of the site also sheet flows into an existing pond that overflows into a seasonal drainage ditch that also outfalls into the Coquille River. All existing onsite stormwater runoff ends up eventually discharging into the adjacent Coquille River located north of the site. Currently and historically, none of this site drainage has been designed or treated per any standards.

Proposed Site Drainage

Moving forward we will utilize Portland's **2020 Stormwater Management Manual** for design guidance and requirements to treat the storm runoff from the site prior to discharging into existing onsite channels and eventually into the Coquille River.

Drainage from the proposed RV Resort will be collected via a system of catch basins. All catch basins will be fitted with both filters and oil water separators. This will be the first step in storm water treatment for the site. The filters will remove debris including heavy metals, sediments, and trash. The oil water separators will trap the oils and other hydrocarbons inside the basins preventing them from leaving the site.

After stormwater is collected in the series of catch basins and initial treatment has been provided via the filters and oil water separators, storm drainage from the site will then be conveyed in bio-swales. The bio-swales will reduce the storm runoff velocity and remove additional pollutants. Bio-swales work to remove pollutants through vegetation and the soil. As the storm water runoff flows through the bio-

civil
structural
surveying
architecture
planning

809 SE Pine St
Roseburg, OR 97470

ieengineering.com
541.673.0166

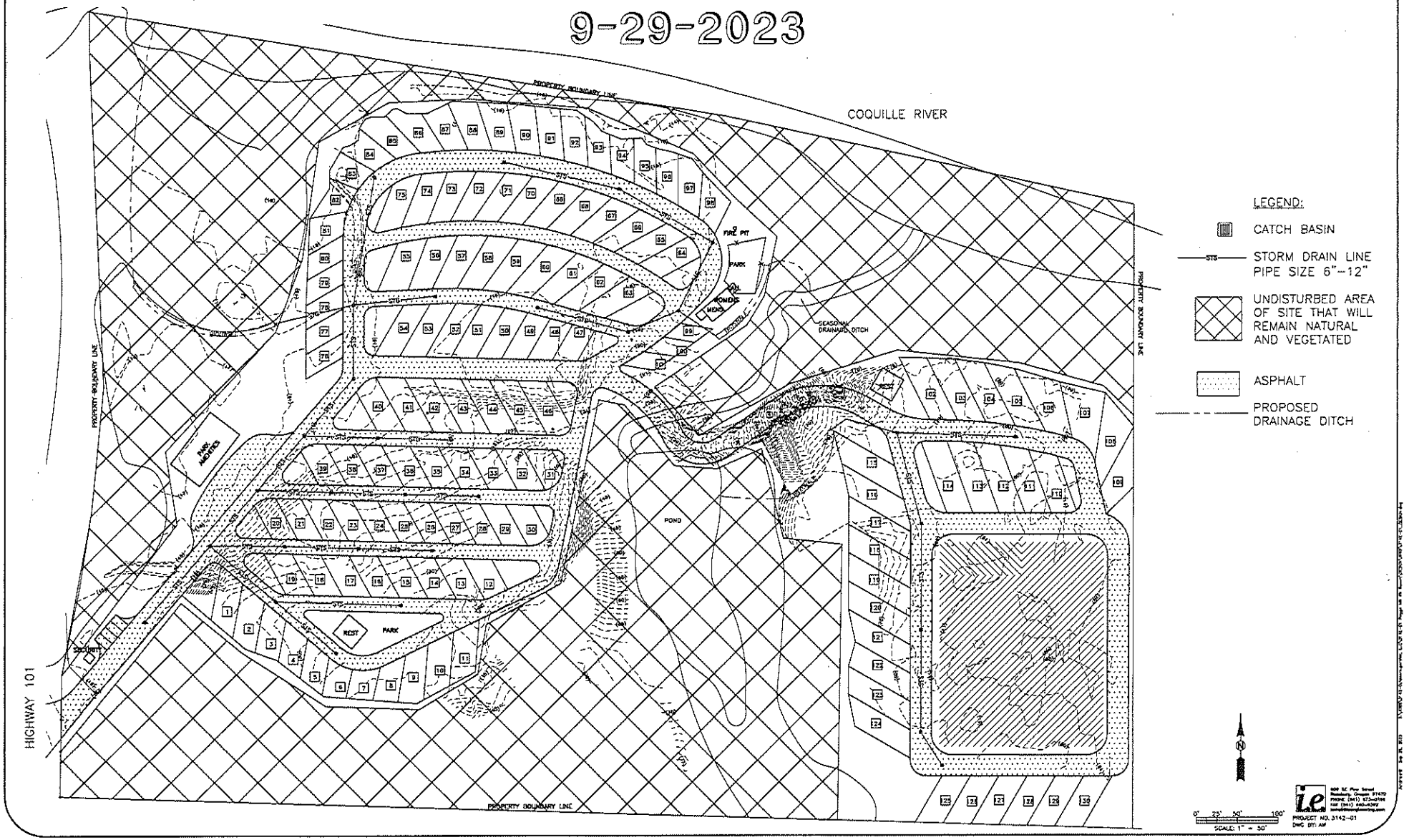
swale, the pollutants are captured and settled by the leaves and stems of the plants placed in the bio-swales per design. The pollutants then enter the soil where they decompose or can be broken down by bacteria uses natural processes. There are several classes of water pollutants that are collected or arrested with bio-swales. These fall into the categories of silt, inorganic contaminants, organic chemicals and pathogens.

The outlet of the bio-swales will discharge near existing drainage channels to closely match predeveloped drainage patterns. The drainage plan for this site will be to maintain the existing drainage patterns of the site, collect the stormwater runoff and then treat that stormwater runoff prior to final discharge from the site.

A detailed drainage report documenting all this will accompany the Final Civil Construction Plans for the project after the project has received the needed planning approvals to move forward.

ROGGE MILL RV PRELIMINARY DRAINAGE PLAN

9-29-2023



civil
structural
surveying
architecture
planning

809 SE Pine St
Roseburg, OR 97470

ieengineering.com
541.673.0166

MEMO

To: Coos County – Planning Department

From: Derek Miller, P.E.

cc:

Date: 9-29-2023

Re: Rogge Mill RV Resort - Wastewater Treatment System

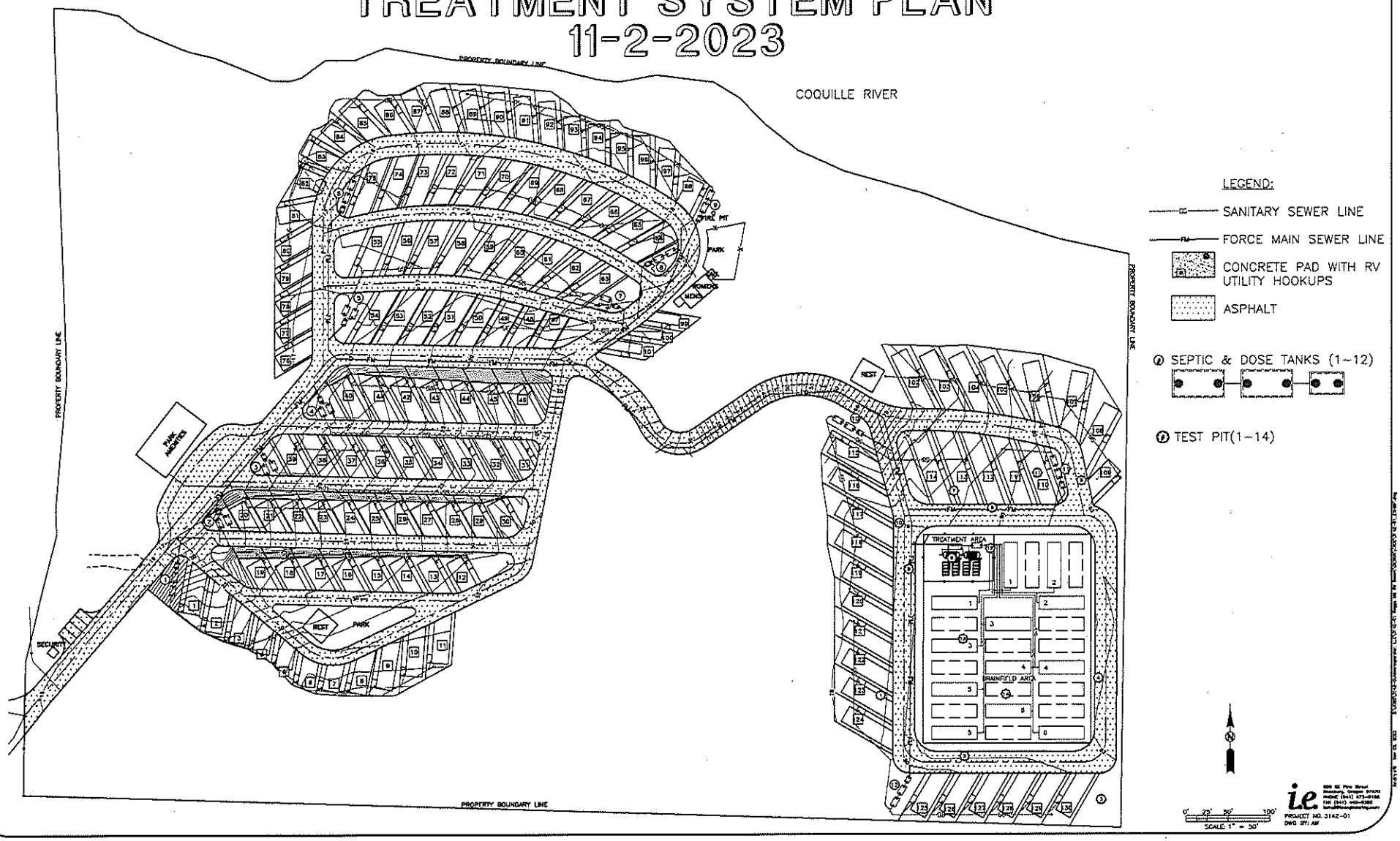
This memo in conjunction with the exhibit labeled "Preliminary Rogge Mill RV Wastewater Treatment System" discusses and displays the collection and treatment of the wastewater for the proposed 130-unit RV Resort

Paul Kennedy and the Oregon DEQ have worked together to investigate the site and studied 14 onsite test pits. DEQ has provided a site evaluation and design criteria for the treatment of the wastewater (see attached).

Each unit will have a standard RV sewer hookup. The raw sewerage from the site will flow by gravity to one of the onsite septic and dose tanks. The septic tanks will be sized to serve up to 12 RV units each. The dose tanks contain pumps to force the effluent into the proposed onsite force main. The force main will connect all of the dose tanks to transfer the effluent to the approved treatment area that is located in the southeast corner of the site. After treatment, the treated effluent will be pumped into a bottomless sand filter.

Ground water studies, a sewer design report, and construction details will be prepared for DEQ's WPCF permit.

ROGGE MILL RV PRELIMINARY WASTEWATER TREATMENT SYSTEM PLAN
11-2-2023



civil
structural
surveying
architecture
planning

809 SE Pine St
Roseburg, OR 97470

ieengineering.com
541.673.0166

MEMO

To: Coos County – Planning Department

From: Derek Miller, P.E.

cc:

Date: 9-29-2023

Re: Rogge Mill RV Resort – Water Source, Treatment, Storage, & Distribution System Memo

This memo, in conjunction with the exhibit labeled "Preliminary Rogge Mill RV Water Plan", discusses and displays the existing water source and proposed treatment, storage, & distribution system for the proposed 130-unit RV Resort. The goal of this memo is to show that adequate water is available onsite to provide service to the proposed development and discuss the water storage and treatment system that will be designed to serve the site.

Water Source

Like the vast majority of rural developments in Oregon, this site will be served via well water. There historically have been three separate wells located on this property. Two of those wells that have historically served the site will not be used for this project. Both of these wells have been damaged over time to the point where they are no longer useable. Those two wells are identified on the exhibit that accompanies this memo and are identified as Well ID 565720, which has been abandoned per Well Report COOS 58226, and Well ID 546124, which currently is the process of being abandoned and will be officially abandoned prior to construction of this project.

The remaining well will serve as the water source for the project. The well is registered with the Oregon Water Resources Department as Well ID: 565722 and is labeled 148801. For specifics and additional information regarding this well, Well Report Coos 58227 can be referenced. This well is located on the west side of the abandoned mill onsite and will be located on the west side of the proposed RV Resort. It has a documented yield of 39.5 gallons per minute.

Water Usage and Water Demand

The estimated water needs for the entire development, when at 100% capacity and completely full, is 15,000 gallons per day. At this peak capacity, pumping at the well yield of 39.5 gallons per minute, 15,000 gallons of water will require the well to be pumped 6 hours and 20 minutes per day. This would leave on average, over 17 hours a day for the well to recharge, on days when the RV Resort is at full capacity. On days when the resort is not a full capacity, the well would be pumped less and have more

civil
structural
surveying
architecture
planning

809 SE Pine St
Roseburg, OR 97470

ieengineering.com
541.673.0166

recharge time than the numbers listed above.

Water Storage

As stated above, the well yield of 39.5 gallons per minute will provide enough water to serve the park at full capacity. To help regulate the pumping of the well, water from the well will be pumped into a small storage reservoir that will be located at the top end of the RV Resort. This tank will be sized at approximately 15,000 gallons providing a full day of storage for the resort at full capacity. Water from the well will be treated and pumped up to the storage reservoir. From the storage reservoir, water will then be conveyed via separate a waterline to the RV Resort for direct use. The reservoir water tank will be elevated as needed to provide adequate water pressure for use.

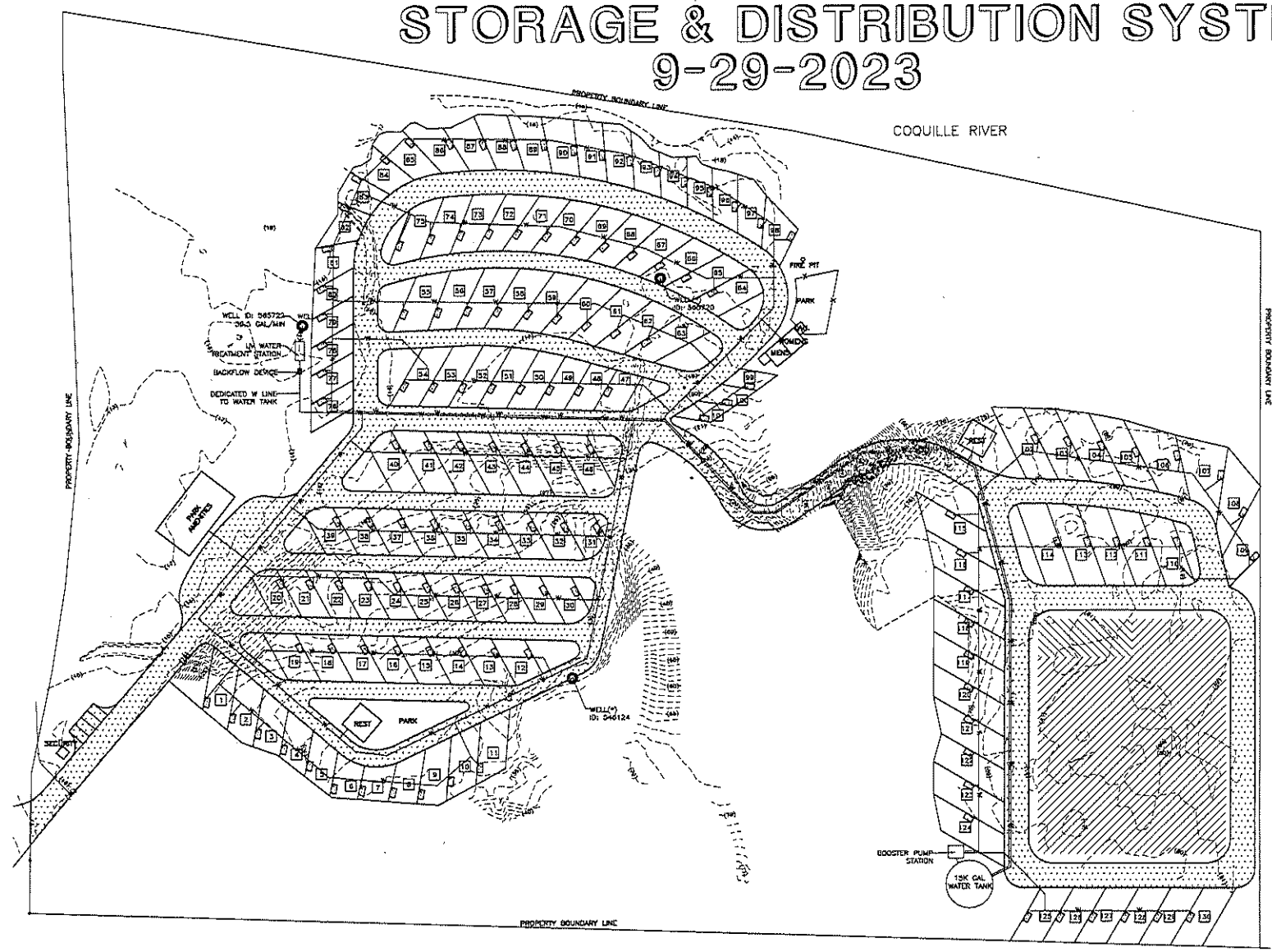
Appropriate pumps will be sized and installed for the project as needed to convey water from the well to the treatment system and then again from the treatment system up to the reservoir. An additional booster pump will be installed next to the proposed water tank on the outlet size as needed to increase the pressure to the upper level to an adequate level.

Water Treatment

An ultraviolet (UV) water treatment system will be installed to disinfect the water that is pumped from the well prior to being pumped up to the storage. UV treatment is proven, established, and approved method of water treatment and is also cost effective and environmentally friendly.

Detailed Engineering Plans for the water treatment, storage and distribution system will be provided in conjunction with the Site Civil Improvement plans after this project has received planning approvals as needed to move forward.

ROGGE MILL RV PRELIMINARY WATER TREATMENT STORAGE & DISTRIBUTION SYSTEM 9-29-2023



WATER SYSTEM:

- UV WATER TREATMENT FROM WELL
- RV WATER HOOKUPS(130)
- 15K GAL WATER TANK AND BOOSTER PUMP STATION FOR UPPER LEVEL

LEGEND:

- BACKFLOW DEVICE
- WATER LINE
- CONCRETE PAD WITH RV UTILITY HOOKUPS
- * WELL EITHER HAS BEEN OR WILL BE ABANDONED PRIOR TO DEVELOPMENT
- ASPHALT

N

0' 25' 50' 100'
SCALE: 1" = 50'

PROJECT NO. 3142-01
DWG BY: AW

WETLAND INVESTIGATION

LAND AND WATER ENVIRONMENTAL SERVICES, INC.
P.O. Box 448, 119 NE 2nd St. Suite B (second floor), Oakland, Oregon 97462
(541) 672-0393 or (541) 459-4141
"Providing environmental services for industry and the public since 1992"
www.landandwater.biz email: office@landandwater.biz

June 17, 2021

Ken Yuen
2100 W 11th Street
Eugene, OR 97401

Mr. Yuen,

At your request, Land And Water Environmental Services, Inc. conducted a site walkover and wetland investigation of a parcel of land in Bandon, Coos County, Oregon. The purpose of the wetland investigation was to determine if the site has wetlands or other waters that may be regulated, and to determine if the proposed activity of an RV Park would impact those wetlands or other waters.

The property is identified as T28S R14W Sec17 TL 1000, 1001, 1002. The investigation primarily focused on TL 1000 as that is where the RV park will be located. The access road from Hwy. 101 is well established and is located in TL 1002. TL 101 is largely undeveloped and is not part of this project or this investigation. The site has a street address of 52185 Hwy 101, Bandon.

The National Wetland Inventory (NWI) and Statewide Wetland Inventory (SWI) both map wetlands on adjacent properties, but do not map wetlands within the study area. The Natural Resource Conservation Service (NRCS) Web Soil Survey web site maps the soil on the site as Udorthents. Udorthents are dredge spoils, historically deposited in low lying estuarine lands to build up and re-claim the land. Udorthents are not considered hydric soils, but they can have hydric soil characteristics under some conditions. The SWI also includes a NRCS hydric soils layer. The SWI hydric soil layer does not show any hydric soils mapped within the study area.

The project site is the location of a former wood products mill that has been closed for some time. All of the machines and equipment that were used in operating the mill are gone. The remaining building has been partially disassembled. The entire wood structure, which is approximately 44,000 square feet sits on a concrete slab. The slab is larger than the building at over 90,000 square feet. The slab is not one solid piece but made up of a few smaller adjoining slabs. There are some open spaces in the slab, exposing the ground, where it appears that mill machinery had been mounted. The slab is mostly intact and sound, although the northwest corner is somewhat fragmented and covered with soil.

The study area consists of the concrete slab, which forms the limits of the project site. The study area boundary is the edge of the slab. The RV Park will be completely situated within the boundaries of the existing concrete slab. There will be no sewer or water hook-ups for the RV's, therefore the slab will not need to be trenched for utilities. One portion of the existing building will be rebuilt to be the RV Park office, bathrooms, and employee residence. The Coquille River is adjacent to the study area to the north. The access point for the RV park will be the existing, established road. The entrance road connects to the slab in the southwest corner. The road will not be widened beyond the existing footprint and therefore will not impact wetlands.

The study area was traversed with somewhat meandering west-east transects, progressing south to north. Extra attention was paid to the edge of the slab, where it interacts with the native ground. Most of the building was open on the sides, the exterior walls having already been removed or did not exist to start, except for the enclosed central area that will become the RV Park office and residence. That portion of the study area was not investigated.

The study area, the concrete slab, is surrounded by wetlands and waters of the State and the United States. There are no wetlands or other waters within the study area itself. The existing road access to the site from Hwy 101 is wide enough to serve the RV Park without additional work. There are wetlands on both sides of the road. There is a culvert under the access road at the edge of the study area in the southwest corner of the slab. There is a ditch adjacent to the east, south, and west boundary of the study area. This ditch appears to receive water from the adjacent undeveloped land to the east and south and direct it around the study area to the west side and northwest towards the Coquille River. The ditch is wetland and is heavily vegetated with a variety of wetland plants, such as slough sedge, soft rush, horsetail, and willow. Wetland hydrology is evident.

The concrete slab extends to near the top of the bank, adjacent to the Coquille River on the north. The Coquille is essential salmonid habitat, and State owned water. The Study Area Boundary is the edge of the concrete slab. The study area does not extend to the Top of Bank or Highest Measured Tide of the Coquille River. The RV Park will not impact the Coquille River.

After a thorough inspection of the site and a discussion on how the RV Park will be operated it was determined that:

- There are no wetlands or waters within the study area, which consists of the entire concrete slab that made up the working floor of the old wood products mill.
- There will be no trenches excavated in the concrete slab for sewer and water hook-ups to the RV spaces. There will be no excavation adjacent to the concrete slab.
- The entrance road to the RV Park will remain within the established footprint of the access road to the old mill site.
- Parking spaces for extra vehicles will be established within the existing concrete slab.

Therefore, it is my Best Professional Judgement and conclusion that no wetlands or waters of the State or the United States are located within the project site Study Area, and no wetlands or waters of the State or the United States will be impacted by this project, as currently planned.

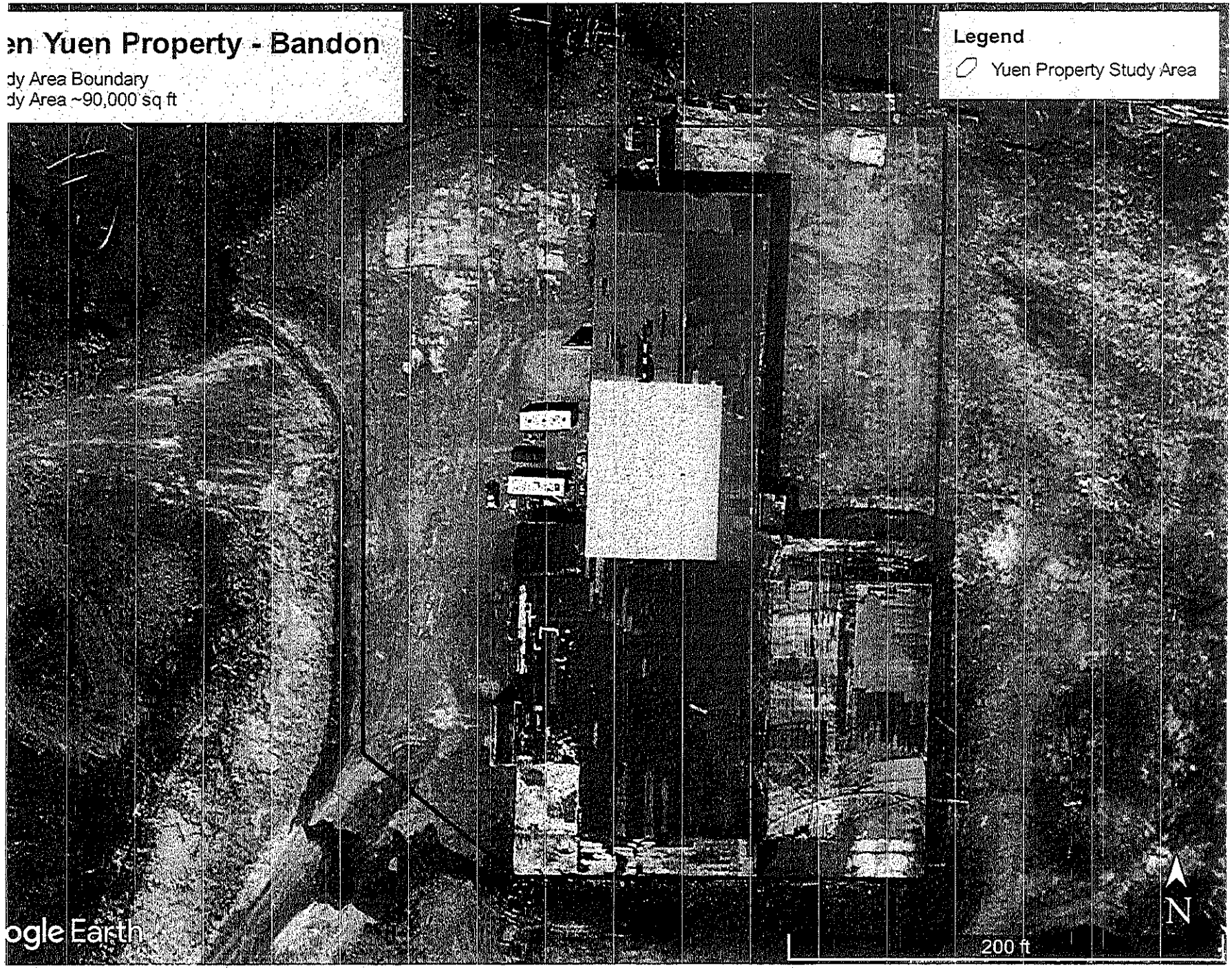
Sincerely,

Loran Waldron

Loran Waldron
Biologist
Land And Water Environmental Services, Inc.

Attachments

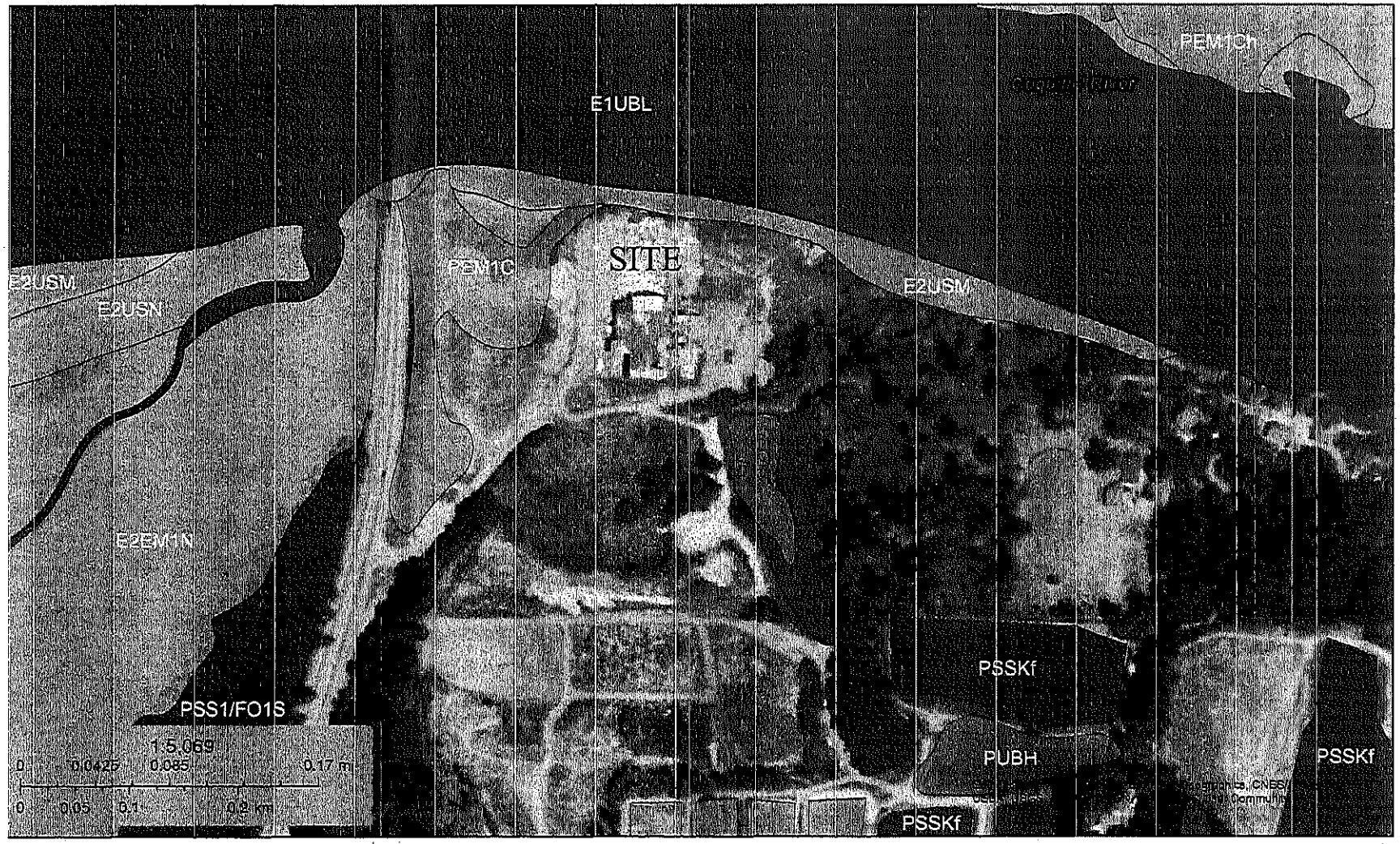
Google Earth Aerial with Study Area Boundary
National Wetlands Inventory and Statewide Wetland Inventory
Maps NRCS Web Soil Survey Map and legends


en Yuen Property - Bandon
dy Area Boundary
dy Area ~90,000 sq ft
Legend
Yuen Property Study Area
ogle Earth
200 ft
N

U.S. Fish and Wildlife Service

National Wetlands Inventory

Ken Yuen Property - Bandon



June 3, 2021

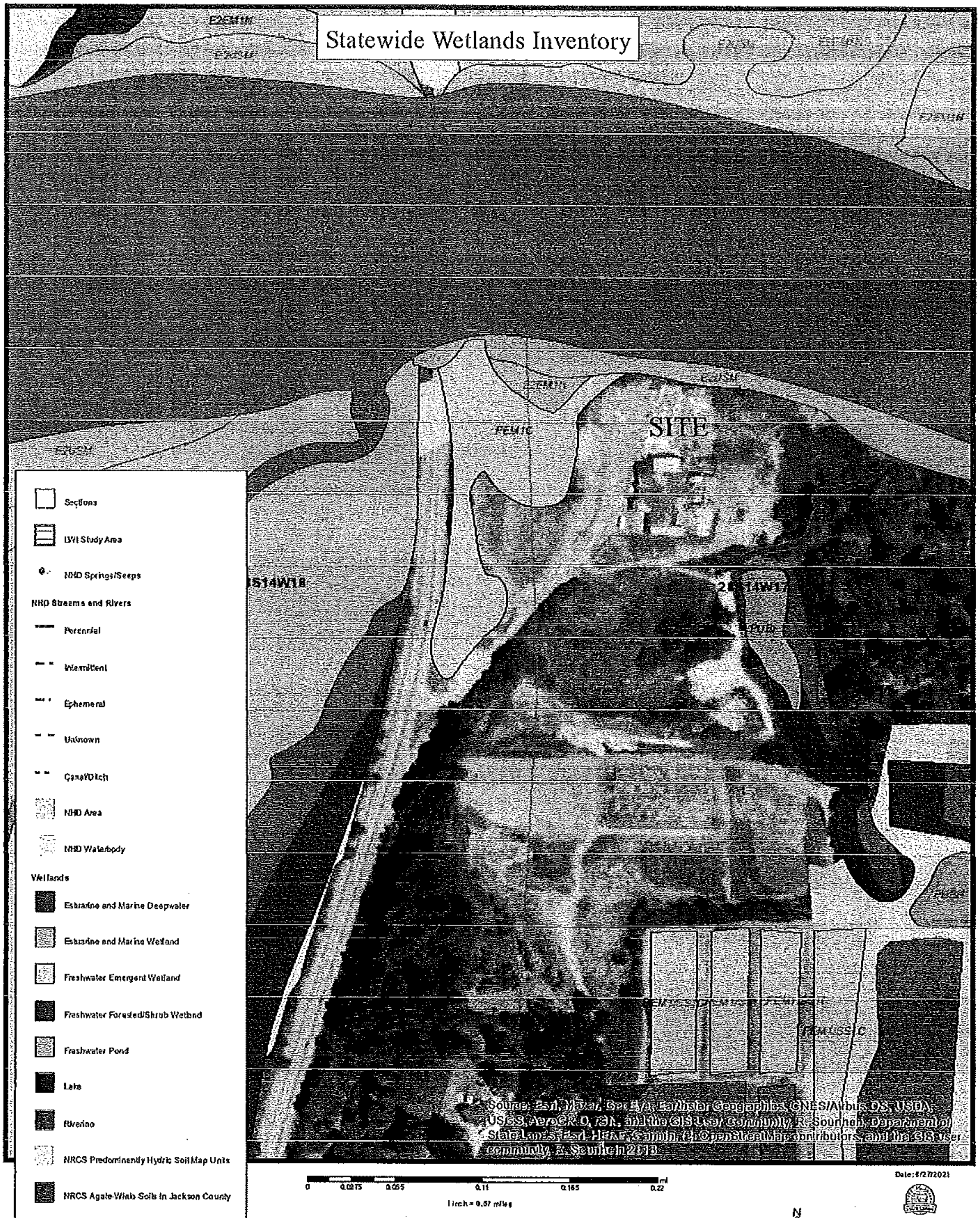
Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

(5



The Statewide Wetlands Inventory (SWI) represents the best data available at the time this map was published and is updated as new data becomes available. In all cases, actual field conditions determine the presence, absence and boundaries of wetlands and waters (such as creeks and ponds). An onsite investigation by a wetland professional can verify actual field conditions.

https://www.oregon.gov/dsl/WW/Pages/SWI.aspx

State of Oregon
Department of State Lands
775 Summer Street NE, Ste 100
Salem, OR. 97301-1279
(503) 986-5200

Soil Map—Coos County, Oregon
(Ken Yuen Property - Bandon)

USDA Natural Resources Conservation Service

Web Soil Survey
National Cooperative Soil Survey

MAP LEGEND

Area of Interest (AOI)
- Area of Interest (AOI)

Soils
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

Special Point Features
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

Water Features
- Streams and Canals

Transportation
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

Background
- Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Coos County, Oregon
Survey Area Data: Version 15, Jun 11, 2020

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

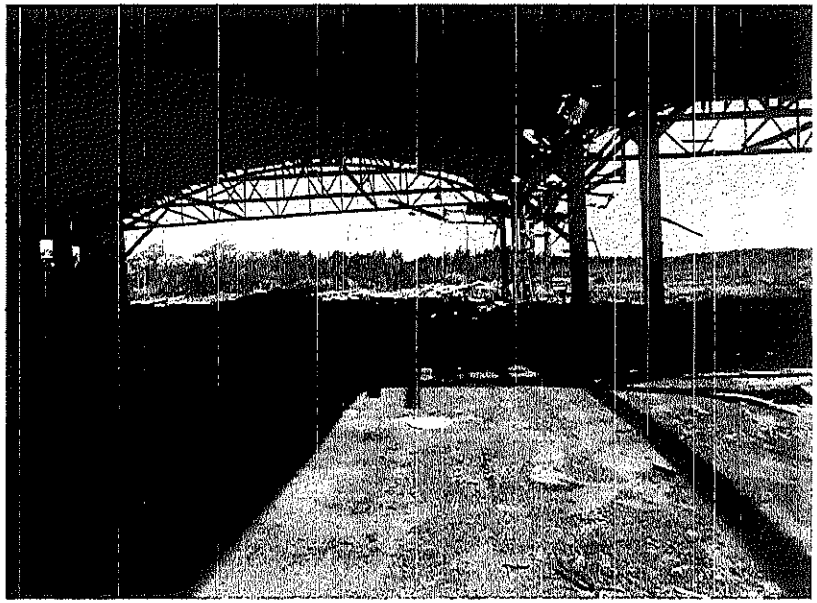
Date(s) aerial images were photographed: Oct 5, 2019—Oct 10, 2019

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
5A	Blacklock fine sandy loam, 0 to 3 percent slopes	3.0	5.2%
8B	Bullards sandy loam, 0 to 7 percent slopes	8.8	15.0%
8E	Bullards sandy loam, 30 to 50 percent slopes	14.0	23.9%
11	Clatsop mucky peat	3.0	5.1%
12	Coquille silt loam	0.2	0.3%
28	Heceta fine sand	0.2	0.4%
57	Udorthents, level	14.1	24.2%
W	Water	15.1	25.9%
Totals for Area of Interest		**58.3**	**100.0%**

1. The study area is the concrete slab that is the floor of the former mill. The rest of the building will be removed.

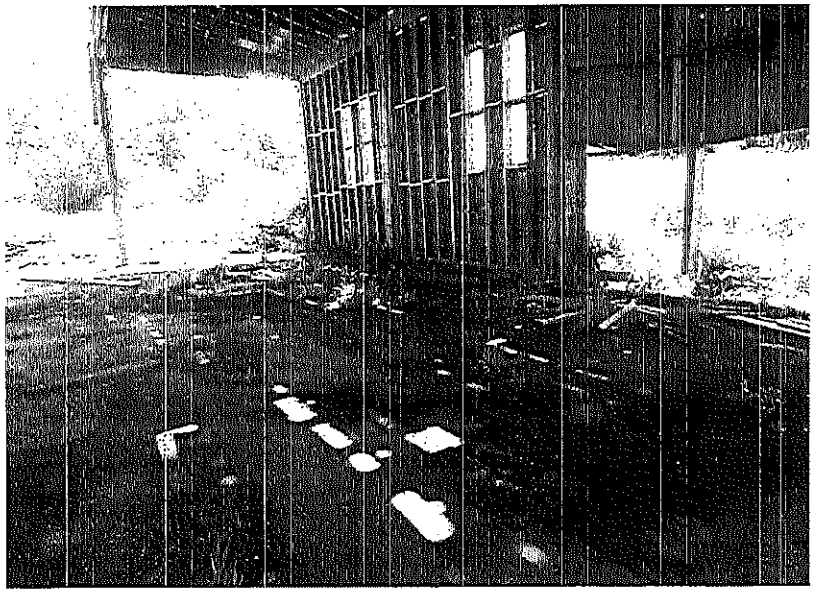


2. The concrete slab from inside under the roof, looking north.

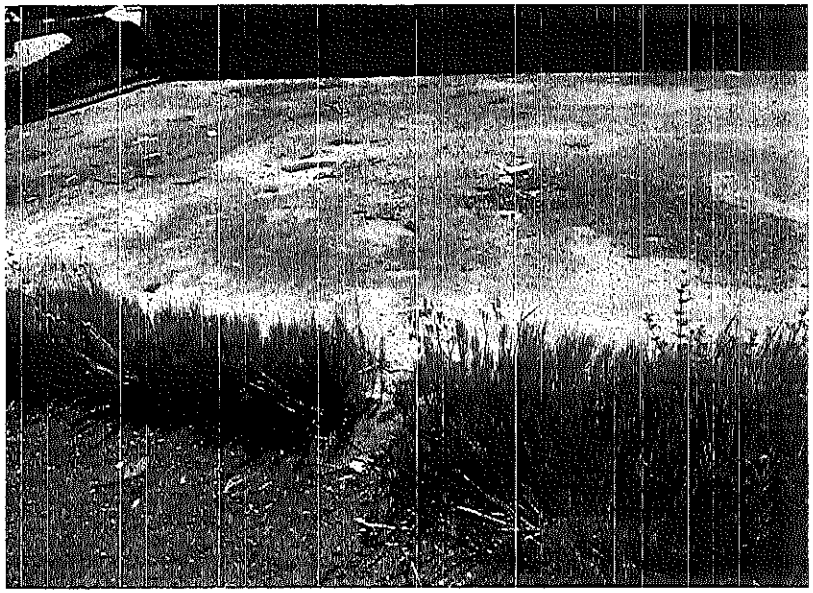
3. View of the study area from the southeast looking northwest.

4. The southeast portion of the study area where the roof has been partially removed.

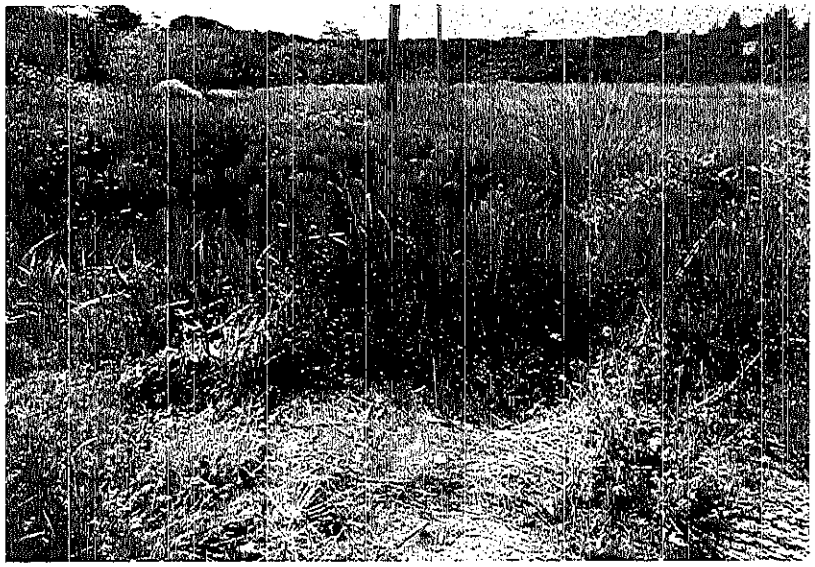
Ken Yuen



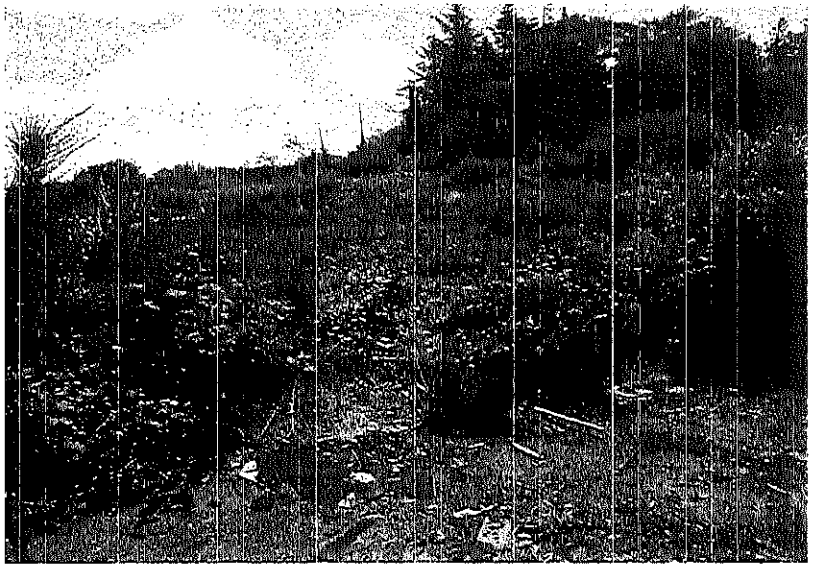
5. The southeast corner of the study area.



6. The southwest edge of the concrete slab.

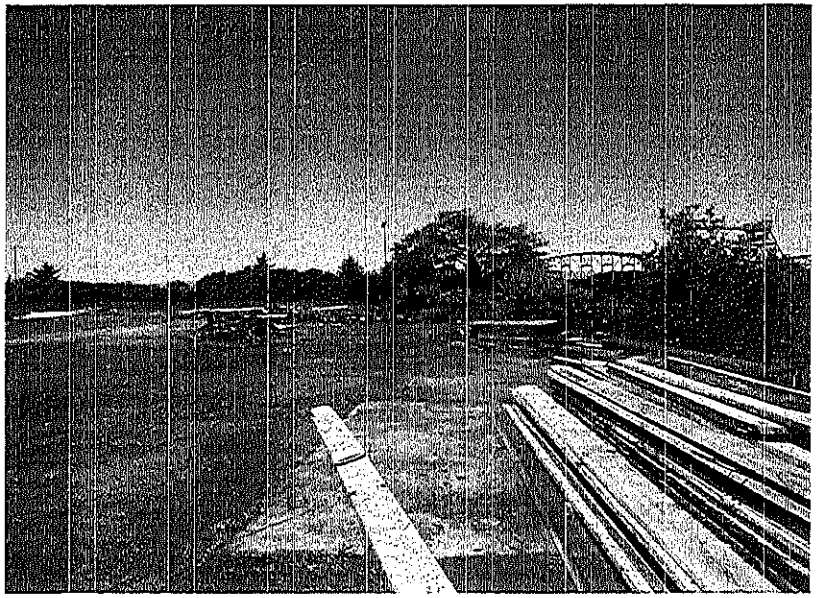


7. Wetlands beyond the study area to the south.

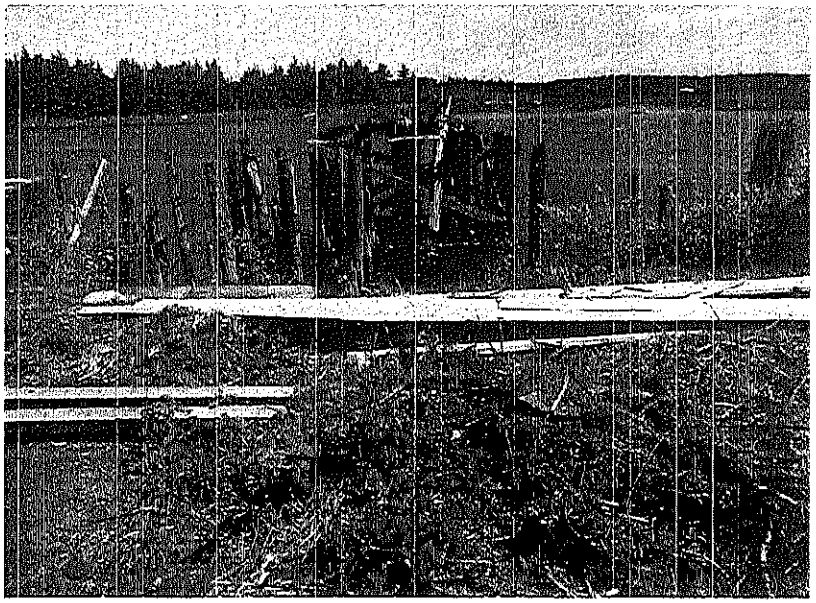


8. View looking east beyond study area.

Ken Yuen



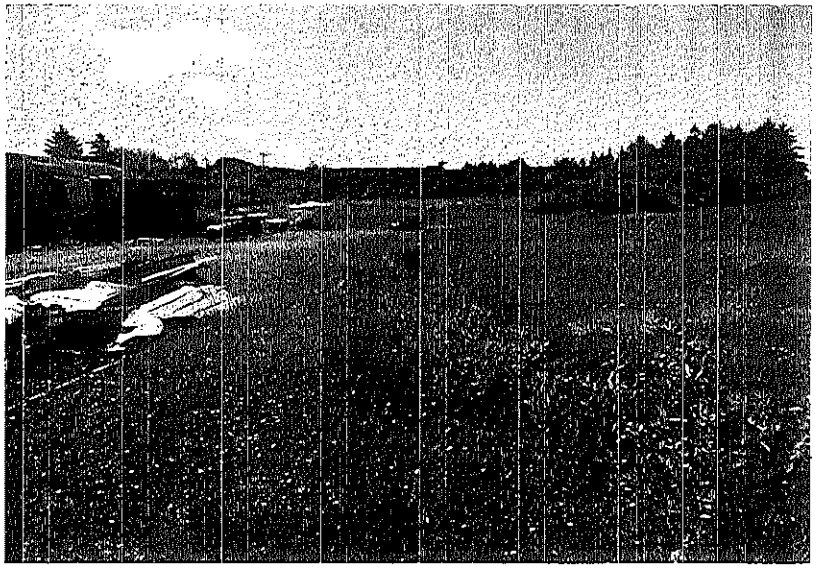
9. Northeast portion of the study area looking west.



10. Looking north beyond study area boundary towards the Coquille River.

Ken Yuen

11. Ditch beyond northwest corner of study area carries water towards the Coquille River.



12. Drainage ditch west of study area.

TRAFFIC EVALUATION

SANDOWENGINEERING
160 MADISON STREET, SUITE A · EUGENE, OREGON 97402 · 541.513.3376

TECH MEMO

RENEWAL 06/30/24

DATE: November 22, 2023

TO: Thomas McIntosh
Land Use Consultant

FROM: Kelly Sandow P.E.
Sandow Engineering

RE: Bandon RV Park Traffic Evaluation

The following provides a traffic evaluation for the proposed RV Park located in Bandon, Oregon.

1.0 SITE INFORMATION

The site is located at Tax Lot 1000 of Assessor's Map 28S-14W-17C along the east side of Highway 101, south of the Coquille River. The site is approximately 25.6 acres and is zoned Qualified-Recreation, Q-REC, a majority of the site. Previous use of this site was 62,000 sf light industrial development.

Site Location

The site will take access from Highway 101. Highway 101 at the site entrance has a posted speed of 55 mph and an AADT of 10,235. The nearest Automatic Traffic Recorder (ATR 06-004) is located south of Bandon on Highway 101. The ATR illustrates that the peak season for this area occurs in July, and the 30th highest hour occurs on a weekday from 12:00-1:00 PM and is 11.6% of the AADT. Based on the AADT, the 30th H.V. is 1,186, and the split is 51% southbound and 49% northbound.

2.0 DEVELOPMENT PROPOSAL

The applicant is proposing an RV park with 130 RV spaces, a clubhouse, and a small retail store. Access to the site will be via the existing access connection to Highway 101 at Mile Post 259.86. The site plan is included as Attachment A.

The trips for the RV Park are estimated using Land Use Code 416 Campground/Recreational Vehicle Park found within the ITE Trip Generation manual 11th ed. Land use code 416 is defined as including ancillary uses such as clubhouses and convenience stores. Therefore, this land use includes all elements of this development proposal and is sufficient for the entire site. Trip rates are provided based on the number of campsites and acreage as the independent variable. There are more studies using the number of campsites as the independent variable. Therefore, the trip rate per campsite is used. Table 1 provides the weekday daily AM and PM Peak hour trips.

TABLE 1: TRIP GENERATION- PROPOSED USE

Time of day	Size	Rate	Trips	In	Out
AM Peak Hour	130 spaces	0.21	27	(36%) 10	(64%) 17
PM Peak Hour	130 spaces	0.27	35	(65%) 23	(35%) 12
ADT	130 spaces	1.91	248	(50%) 124	(50%) 124

* ITE does not have a Trip Rate for ADT. The ADT is estimated using the daily-to-PM ratio for Land Use 411 Public Park

3.0 CHANGE OF USE

The site's access connection is on Highway 101, which is under the jurisdiction of ODOT. As per Oregon Administrative Rule (OAR) 734-051-3020, a new application for access connections to state facilities is required when there is a "change of use". As per OAR 734-051-3020(2), a change of use is defined in the following:

a) ***The number of peak hour trips increases by fifty (50) trips or more from that of the property's prior use and the increase represents a twenty (20) percent or greater increase in the number of peak hour trips from that of the property's prior use;***
b) ***The average daily trips increases by five hundred (500) trips or more from that of the property's prior use and the increase represents a twenty (20) percent or greater increase in the average daily trips from that of the property's prior use;***

The site's prior use was a 62,000-square-foot light industrial building. The trips for this use are estimated using Land Use 110 General Light Industrial. Table 2 provides the trip generation estimate.

TABLE 2: TRIP GENERATION- PREVIOUS USE

Time Period	Size	Trip Rate	Trips
AM Peak Hour	62 ksf	0.74	46
PM Peak Hour	62 ksf	0.65	40
Daily	62 ksf	4.87	302

As shown in Table 1, the AM peak hour of the proposed use is 27, the PM peak hour of the proposed use is 35, and the daily trips are 248. The proposed use will generate fewer trips in the peak hour and ADT than the previous use. The standards of (a) and (b) are not met.

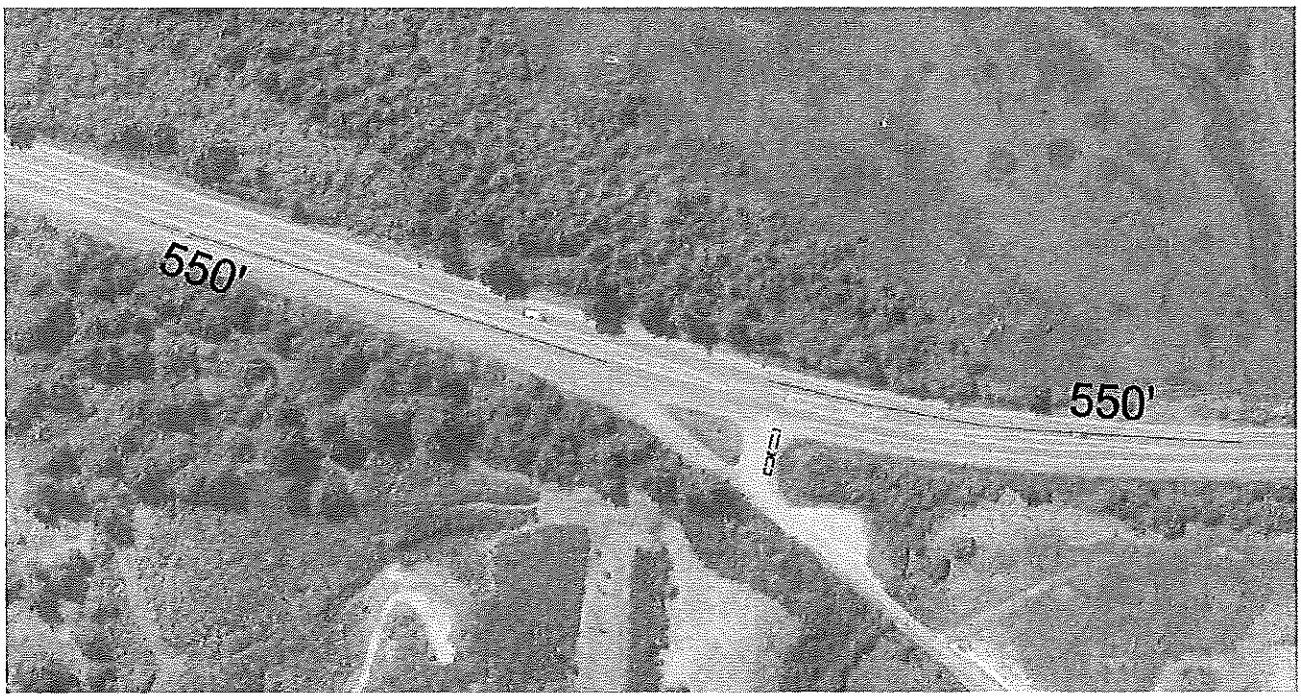
c) ***The daily use of a connection increases by ten (10) or more vehicles with a gross vehicle weight rating of twenty-six thousand (26,000) pounds or greater; or***

The proposed RV Park will have trips from a range of RVs, trailers, and passenger vehicles. The average weight is 10,000 lbs. with the typical range of 900 lbs.-2,500 lbs. The site is not anticipated to have an increase in 10 or more vehicles over 26,000 lbs. when compared to the previous industrial use.

(e) The connection does not meet the stopping sight distance standards, as measured in feet, of ten (10) times the speed limit established in ORS 811.111 or the designated speed posted under 810.180 for the highway as measured in miles per hour, or ten (10) times the 85th percentile speed of the highway where the 85th percentile speed is higher or lower than the speed limit established in 811.111 or the designated speed posted under 810.180. The applicant may perform a study to determine if the 85th

> ***percentile speed is higher or lower than the speed limit established in 811.111 or the designated speed posted under 810.180. The sight distance measurement, as described in OAR 734-051-4020(2)(c)(A)–(B), and the study to determine the 85th percentile speed shall be performed according to published department procedures by or under the supervision of a professional engineer as defined in 734-051-1070. The measurement shall be taken under existing and proposed site conditions.***

The posted speed is 55 mph. Ten (10) times the posted speed is 550 feet. The stopping sight distance is measured on Highway 101 from the conflict point both north and south within the travel lane. As illustrated in the image below, the line of sight is met.



Line of Sight

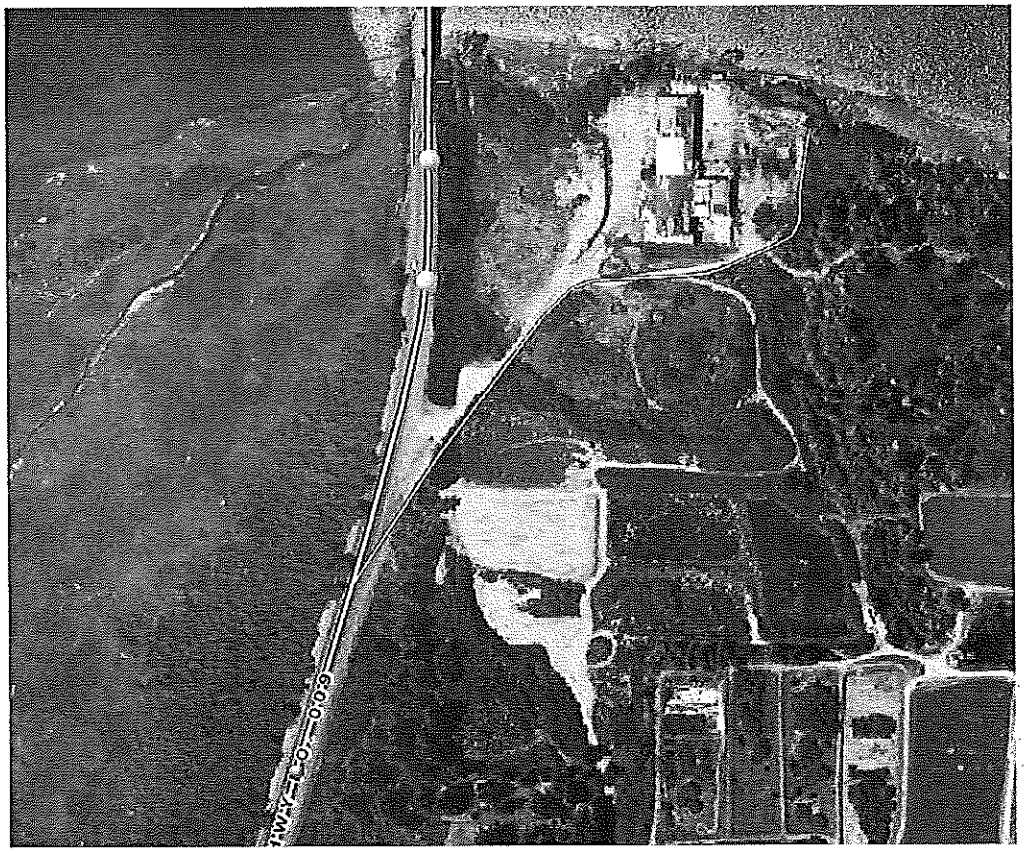
The proposed RV Park does not meet any of the criteria for a "change of use" as per OAR 734-051-3020. Therefore, a new access application is not required.

4.0 SAFETY EVALUATION

A safety evaluation was prepared for the access with the proposed use. The evaluation considers crash history, operation, queuing, turning movements, and line of sight.

CRASH EVALUATION

There were no reported crashes at the site access within the most recent 5 years of available data from 1/1/2017 to 12/31/2021. There was 1 crash reported south of the driveway. This crash was caused by a vehicle stopping for a deer in the roadway. There were 2 reported crashes north of the access. One crash was the result of a single vehicle traveling too fast and leaving the roadway. The other crash involved a single vehicle that lost control due to slippery conditions. There were no crashes reported at the driveway. Additionally, the segment of Highway 101 containing the site access is not an ODOT SPIS site.

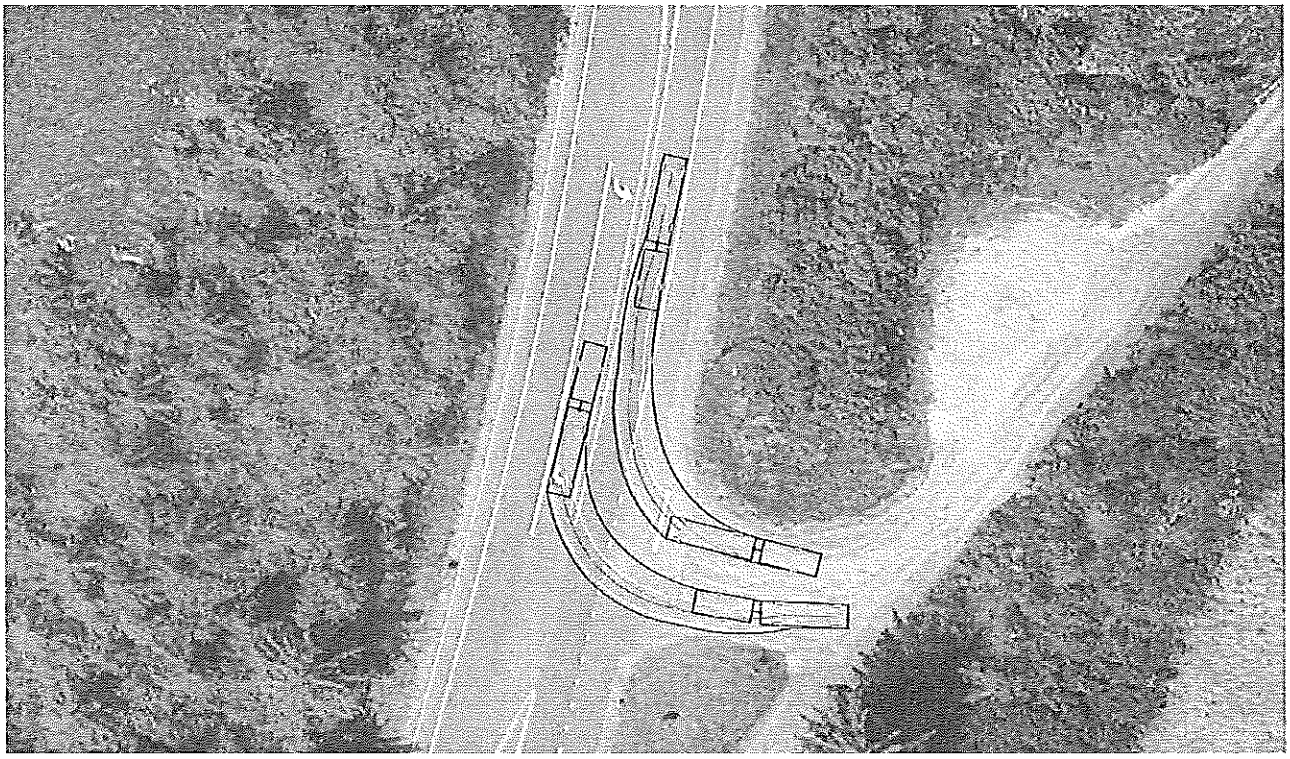


Crashes on Highway 101- Source ODOT TransGIS

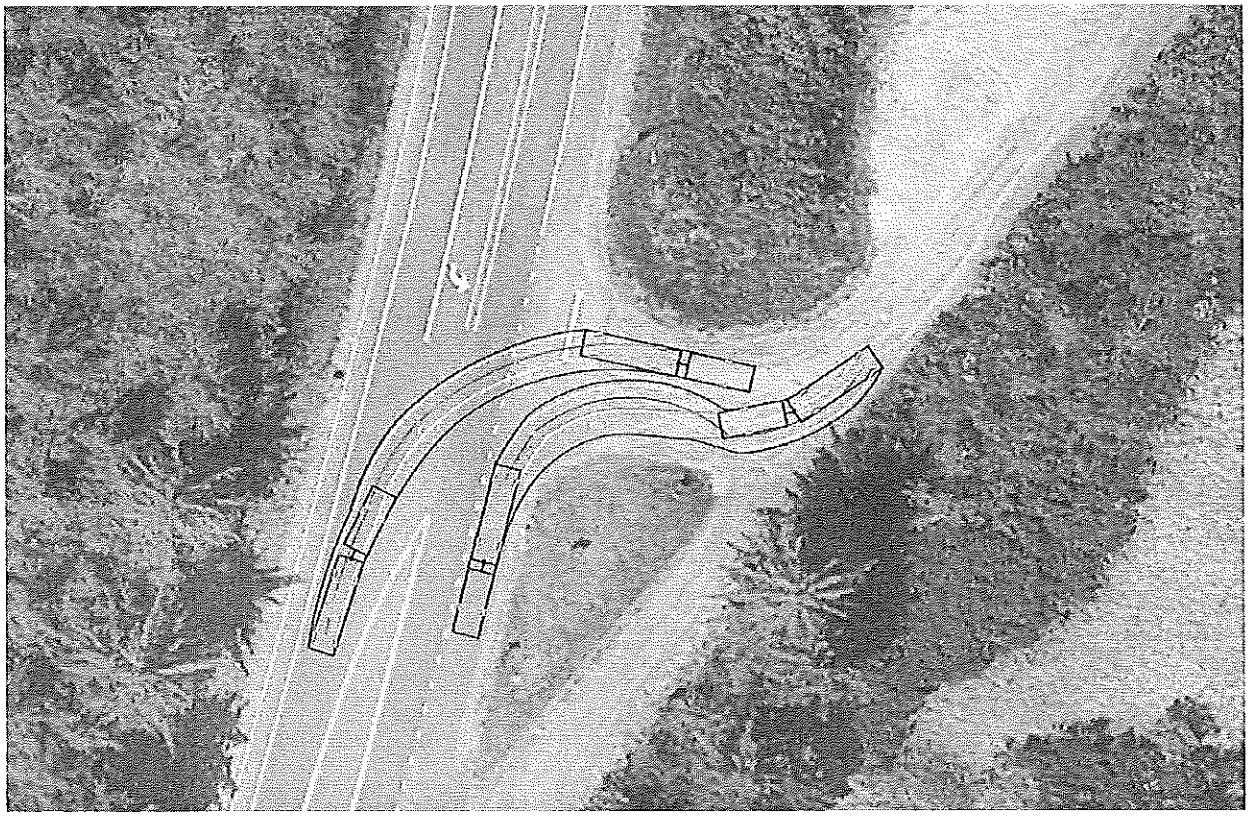
ACCESS CONFIGURATION

There is a separate southbound left turn lane for vehicles entering the site. The left-turning movement has approximately 170' of storage and a 125-foot taper. Additionally, the access has a separate channelized northbound right turn pocket. The right turn pocket has approximately 175 feet of taper. There is adequate channelization for turning movements from the highway.

The access was evaluated for sufficient geometry for the turning movements of a 30-foot RV pulling a boat. The evaluation was performed using the AASHTO vehicle characteristics and the AutoTURN Software. The turn templates are provided below. As demonstrated, the geometry is sufficient for the turn paths.



Turns to/from the North at the Site Access



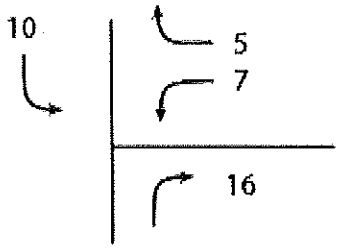
Turns to/from the South at the Site Access

V/C AND QUEUING

The PM Peak Hour trips are estimated to be distributed on the system as follows:

- 60% to/from the south
- 40% to/from the north

The trip distribution at the access is estimated as follows:



The access v/c and queuing are estimated using Synchro 10 and SimTraffic 10 software. The movement v/c is compared to ODOT's standards. Highway 101 is a Statewide Highway with a posted speed of 55 mph, and is outside the Urban Growth Boundary. As per the Oregon Highway Plan, the v/c standard is 0.70 for the Highway 101 approaches and 0.75 for the site access. Table 3 provides the v/c results. The evaluation is prepared for the peak season, weekday, 30th H.V. conditions with the RV Park at full capacity. Attachment B contains the Synchro 10 output.

TABLE 3: V/C RESULTS

Movement	Standard	v/c
Westbound	0.75	0.06
Southbound Left	0.70	0.01

As demonstrated in Table 3, the v/c ratio for all movements meets the standard.

The queuing analysis was evaluated for the peak season, weekday, 30th H.V. conditions with the RV Park at full capacity. The queuing analysis is prepared for the 95th percentile and average queue lengths. The queue lengths are rounded to 25 feet to represent the space for an average vehicle. Table 4 provides the queuing results. Attachment C contains the SimTraffic 10 output.

TABLE 4: QUEUING RESULTS

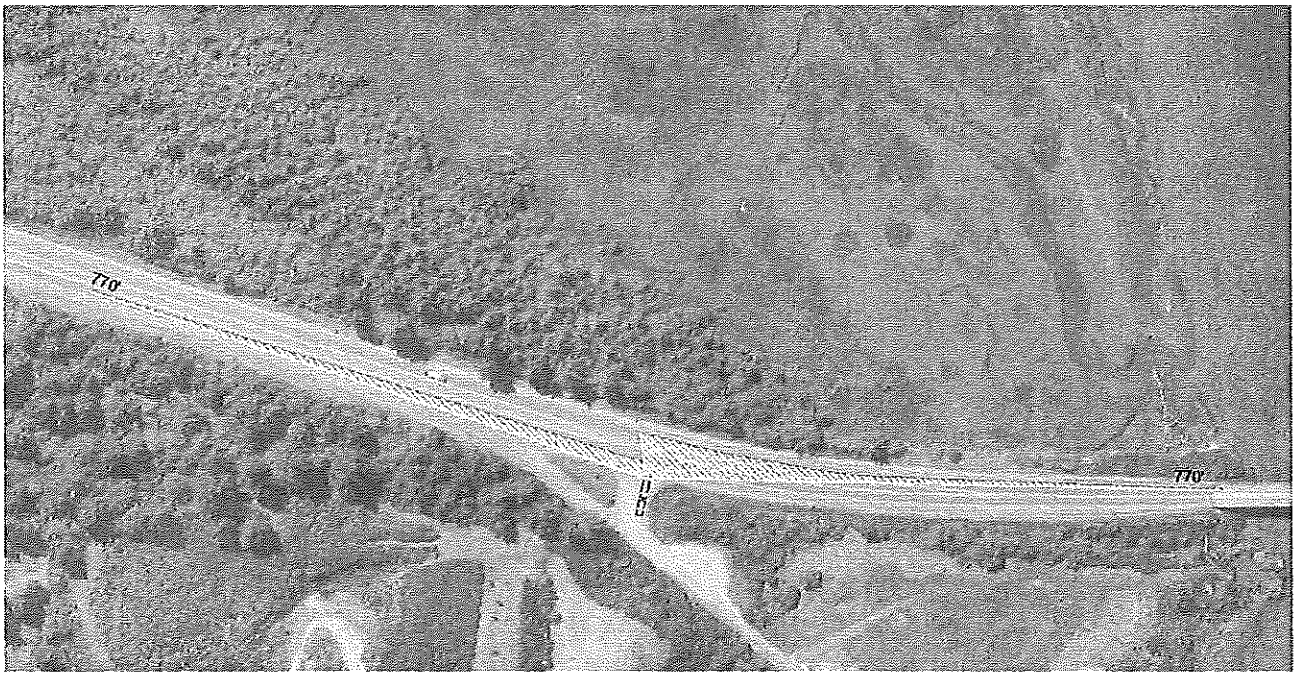
Movement	Available Storage Feet	Average (Feet)	95th (Feet)
Westbound	100+	25	50
Southbound Left	170	25	25

As demonstrated in Table 4, the queue demand will not exceed the available storage.

There are no capacity or queuing concerns.

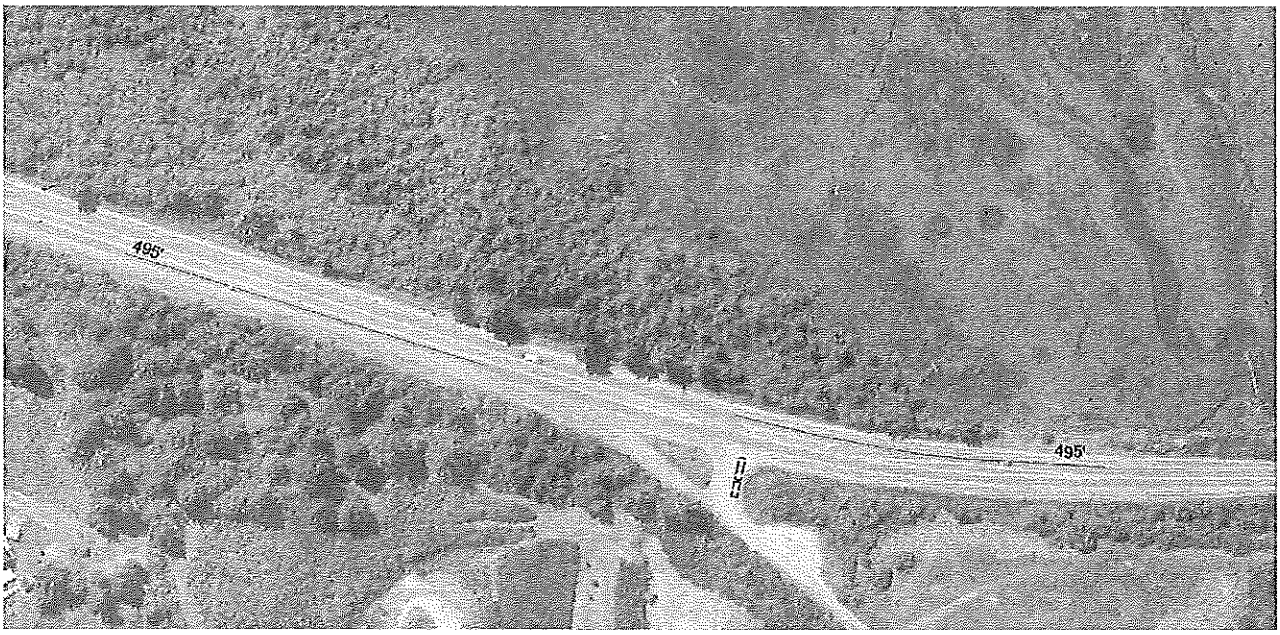
LINE OF SIGHT

The access line of sight was evaluated for the departure sight distance and the stopping sight distance following the AASHTO Methodology. The departure sight distance is the length of roadway that a driver exiting the access to Highway 101 needs to have clear to observe an adequate gap in traffic to turn and begin to travel up to speed. An RV has a time gap of 9.5 seconds. At 55 mph, the driver of an RV needs to have a clear line of sight of 770 feet in either direction to make a left turn. The departure sight distance measurement is shown below. As demonstrated, the sight distance is met.



Departure Sight Distance

The stopping sight distance is the length of the roadway a driver needs to see ahead of the access to safely stop for a conflict/vehicle entering, exiting, or stopping at the site access. The stopping sight distance at 55 mph is 495'. The stopping sight distance measurement is illustrated below. As demonstrated, the sight distance is met.



5.0 FINDINGS

There are no safety or operational concerns at the access for the proposed RV Park use, as demonstrated in this analysis and summarized in the following:

- There is adequate channelization for turns into the site.
- The v/c standards are met.
- The queuing at full capacity of the RV park will not exceed the available storage.
- The sight departure and stopping sight distances are met.

TRUST DEED

RECORDING REQUESTED BY:
TICOR TITLE™
Company of Oregon

201 Central Avenue
Coos Bay, OR 97420

Coos County, Oregon	2022-05779
$101.00 Pgs=4	06/22/2022 01:24 PM
eRecorded by: TICOR TITLE COOS BAY	
Diris D. Murphy, Coos County Clerk	

AFTER RECORDING RETURN TO:
Shun Chung Pun and Wai King Yeung
1617 Provincial Way
Eugene, OR 97401

SPACE ABOVE THIS LINE FOR RECORDER'S USE

TRUST DEED

THIS TRUST DEED, made on the 26th day of May, 2022 between Outdoorsuperstar, LLC, as Grantor, Ticor Title Company of Oregon, as Trustee and Shun Chung Pun and Wai King Yeung, as Beneficiary,

WITNESSETH:

Grantor irrevocably grants, bargains, sells and conveys to trustee in trust, with power of sale, the property in Coos County, Oregon described as:

Parcels 1, 2 and 3 of Partition Plat 1999 #2, filed and recorded January 20, 1999, CAB C-266, as Instrument No. 1999-771, Coos County, Oregon.

TOGETHER WITH a non-exclusive easement for ingress and egress, including the terms and provisions thereof as set forth on the recorded partition, recorded January 20, 1999 as Instrument No. 1999-711, Records of Coos County, Oregon.

together with all and singular the tenements, hereditaments and appurtenances and all other rights belonging or in any way now or after appertaining, and the rents, issues and profits and all fixtures used in connection with the property.

FOR THE PURPOSE OF SECURING PERFORMANCE of each agreement of grantor and payment of the sum of Seven Hundred Fifty Thousand And No/100 Dollars ($750,000.00) Dollars, with the interest according to the terms of a promissory note of even date, payable to beneficiary and made by grantor, the final payment of principal and interest, if not sooner paid, to be due and payable January 1, 2027.

The date of maturity of the debt secured by this instrument is the date, stated above, on which the final installment of the note becomes due and payable. **In the event the within described property, or any interest therein is sold, agreed to be sold, conveyed, assigned or alienated by grantor without first having obtained the written consent or approval of the beneficiary, then at the beneficiary's option, all obligations secured by this instrument, irrespective of the maturity dates expressed, shall become immediately due and payable.**

To protect the security of this trust deed, grantor agrees:

1. To protect, preserve and maintain the property in good condition and repair; not to remove or demolish any building or improvement; not to commit or permit any waste of the property.
2. To complete or restore promptly and in good and habitable conditions any building or improvement which now exists or may be constructed, and which is damaged or destroyed, and pay when due all costs incurred.
3. To comply with all laws, ordinances, regulations, covenants, conditions and restrictions affecting the property; if the beneficiary so requests, to join in executing such financing statements pursuant to the Uniform Commercial Code as the beneficiary may require and to pay for filing the same in the proper public office or offices, as well as the cost of all lien searches made by filing officers or searching agencies as may be deemed desirable by the beneficiary.
4. To provide and continuously maintain insurance on the buildings now or hereafter erected on the property against loss or damage by fire and such other hazards as the beneficiary may from time to time require, in an amount not less than the full insurable value, written in companies acceptable to the beneficiary, with loss payable to the latter; all policies of insurance shall be delivered to the beneficiary as soon as insured; if the grantor shall fail for any reason to procure any such insurance and to deliver the policies to the beneficiary at least fifteen (15) days prior to the expiration of any policy of insurance now or hereafter placed on the buildings, the beneficiary may procure the same at grantor's expense. The amount collected under any fire or other insurance policy may be applied by beneficiary upon any indebtedness secured and in such order as beneficiary may determine, or at the option of beneficiary the entire amount so collected, or any part, may be released to grantor. Such application or release shall not cure or waive any default or notice of default or invalidate any act done pursuant to such notice.
5. To keep the property free from construction liens and to pay all taxes, assessments and other charges assessed upon or against the property before any part of such taxes, assessments and other charges become past due or delinquent and promptly delivered receipts to beneficiary; should the grantor fail to make payment of any taxes, assessments, insurance premiums, liens or other charges payable by grantor, either by direct payment or by providing beneficiary with funds with which to make such payment, beneficiary may, at its option, make payment, and the amount so paid, with interest at the rate set forth in the note secured, together with the obligations described in paragraphs 6 and 7 of this trust deed, shall be added to and become a part of the debt secured by this trust deed, without waiver of any rights arising from breach of any of the covenants and for such payments, with interest as aforesaid, the property described, as well as the grantor, shall be bound to the same extent that they are bound for the payment of the obligation described, and all such payments shall be immediately due and payable without notice, and the nonpayable shall, at the option of the

beneficiary, render all sums secured by this trust deed immediately due and payable and constitute a breach of this trust deed.

6. To pay all costs, fees and expenses of this trust including the cost of title search as well as other costs and expenses of the trustee incurred in connection with or in enforcing this obligation and trustee's fees and attorney's fees actually incurred.

7. To appear in and defend any action or proceeding purporting to affect the security rights or powers of beneficiary or trustee; and in any suit, action or proceeding in which the beneficiary or trustee may appear, including any suit for the foreclosure of this trust deed, to pay all costs and expenses, including evidence of title and the beneficiary's or trustee's attorney's fees; the amount of attorney's fees mentioned in this paragraph 7 in all cases shall be fixed by the trial court and in the event of any appeal from any judgment or decree of the trial court, grantor further agrees to pay such sum as the appellate court shall adjudge reasonable as the beneficiary's or trustee's attorney's fees on such appeal.

It is mutually agreed that:

8. In the event that any portion or all of the property shall be taken under the right of eminent domain or condemnation, beneficiary shall have the right, if it so elects, to require that all or any portion of the monies payable as compensation for such taking which are in excess of the amount required to pay all reasonable costs, expenses and attorney's fees necessarily paid by grantor in such proceedings, shall be paid to beneficiary and applied by it first upon any reasonable costs and expenses and attorney's fees, both in the trial and appellate courts, necessarily paid or incurred by beneficiary in such proceedings, and the balance applied upon the indebtedness secured; and grantor agrees, at its own expense, to take such actions and execute such instruments shall be necessary in obtaining such compensation, promptly upon beneficiary's request.

9. At any time and from time to time upon written request of beneficiary, payment of its fees and presentation of this deed and the note for endorsement (in case of full reconveyances, for cancellation), without affecting the liability of any person for the payment of the indebtedness, trustee may (a) consent to the making of any map or plat of the property; (b) join in granting any easement or creating any restriction; (c) join in any subordination or other agreement affecting this deed or the lien or charge; (d) reconvey, without warranty, all or any part of the property. The grantee in any reconveyance may be described as the "person or persons legally entitled thereto," and the recitals of any matters or facts shall be conclusive proof of their truthfulness.

10. Upon any default by grantor, beneficiary may at any time by receiver to be appointed by a court, and without regard to the adequacy of any security for the indebtedness secured, enter upon and take possession of the property or any part, in its own name sue or otherwise collect rents, issues and profits, including those past due and unpaid, and apply the same, less costs and expenses of operation and collection, including reasonable attorney's fees upon any indebtedness secured, and in such order as beneficiary may determine.

11. The entering upon and taking possession of the property, the collection of such rents, issues and profits, or the proceeds of fire and other insurance policies or compensation or awards for any taking or damage of the property, and the application or release, shall not cure or waive any default or invalidate any act done pursuant to such notice.

12. Upon default by grantor in payment of any indebtedness secured or in grantor's performance of any agreement, time being of the essence with respect to such payment and/or performance, the beneficiary may declare all sums secured immediately due and payable. In such an event the beneficiary may elect to proceed to foreclose this trust deed in equity as a mortgage or direct the trustee to foreclose this trust deed by advertisement and sale, or may direct the trustee to pursue any other right or remedy, either at law or in equity, which the beneficiary may have. In the event the beneficiary elects to foreclose by advertisement and sale, the beneficiary or the trustee shall execute and cause to be recorded a written notice of default and election to sell the property to satisfy the obligation secured and the trustee shall fix the time and place of sale, give notice as then required by law and proceed to foreclose this trust deed in the manner provided by law.

13. After the trustee has commenced foreclosure by advertisement and sale, and at any time prior to the time provided by law before the date the trustee conducts the sale, the grantor or any other person so privileged, may cure the default or defaults. If the default consists of a failure to pay, when due, sums secured by the trust deed, the default may be cured by paying the entire amount due at the time of the cure other than such portion as would not then be due had no default occurred. Any other default that is capable of being cured may be cured by tendering the performance required under the obligation or trust deed. In any case, in addition to curing the default or defaults, the person effecting the cure shall pay to the beneficiary all costs and expenses actually incurred in enforcing the obligation of the trust deed together with trustee's and attorney's fees not exceeding the amounts provided by law.

14. Otherwise, the sale shall be held on the date and at the time and place designated in the notice of sale or the time to which the sale may be postponed as provided by law. The trustee may sell the property either in one parcel or in separate parcels, and shall sell the parcel or parcels at auction to the highest bidder for cash, payable at the time of sale. Trustee shall deliver to the purchaser its deed in form as required by law conveying the property so sold, but without any covenant or warranty, express or implied. The recitals in the deed of any matters of fact shall be conclusive proof of their truthfulness. Any person, excluding the trustee, but including the grantor and beneficiary may purchase at the sale.

15. When trustee sells pursuant to the powers provided, trustee shall apply the proceeds of sale to payment of (1) the expenses of sale, including the compensation of the trustee and a reasonable charge by trustee's attorney, (2) to the obligation secured by the trust deed, (3) to all persons having recorded liens subsequent to the interest of the trustee in the trust deed as their interests may appear in the order of their priority and (4) the surplus, if any, to the grantor or to any successor in interest entitled to such surplus.

16. Beneficiary may from time to time appoint a successor or successors to any trustee named or to any successor trustee appointed. Upon such appointment, and without conveyance to the successor trustee, the

latter shall be vested with all title, powers and duties conferred upon any trustee named or appointed. Each such appointment and substitution shall be made by written instrument executed by beneficiary, which, when recorded in the records of the county or counties in which the property is situated, shall be conclusive proof of proper appointment of the successor trustee.

17. Trustee accepts this trust when this deed, duly executed and acknowledged, is made a public record as provided by law. Trustee is not obligated to notify any party of pending sale under any other deed of trust or of any action proceeding in which grantor, beneficiary or trustee shall be a party unless such action or proceeding is brought by trustee.

The grantor covenants and agrees to and with the beneficiary and the beneficiary's successor in interest that the grantor is lawfully seized in fee simple of the real property and has a valid, unencumbered title, excepting and subject to:

and that the grantor will warrant and forever defend the same against all persons.

The grantor warrants that the proceeds of the loan represented by the above described note and this trust deed are:

(a)* primarily for grantor's personal, family or household purposes (see Important Notice below),

(b) ~~for an organization, or (even if grantor is a natural person) are for business or commercial purposes.~~

This deed applies to, insures to the benefit of and binds all parties, their heirs, legatees, devisees, administrators, executors, personal representatives, successors and assigns. The term beneficiary shall mean the holder and owner, including pledgee, of the contract secured, whether or not named as a beneficiary.

In construing this trust deed, it is understood that the Grantor or Beneficiary may be more than one person; that if the context so requires, the singular shall be taken to mean and include that plural, and that generally all grammatical changes shall be made, assumed and implied to make the provisions apply equally to corporations and to individuals.

Note: The Trust Deed Act provides that the trustee must be either an attorney, who is an active member of the Oregon State Bar, a bank, a trust company or savings and loan association authorized to do business under the laws of Oregon or the United States, a title insurance company authorized to insure title to real property of this state, its subsidiaries, affiliates, agents or branches, the United States or any agency thereof, or an escrow agent licensed under state law.

***IMPORTANT NOTICE: Delete, by lining out, whichever warranty (a) or (b) is not applicable; if warranty (a) is applicable and the beneficiary is a creditor as such word is defined in the Truth-in-Lending Act Regulation Z, the beneficiary MUST comply with the Act and Regulation by making required disclosure. If compliance with the Act is not required, disregard this notice.**

WARNING

Unless you provide us with evidence of the insurance coverage as required by our contract or loan agreement, we may purchase insurance at your expense to protect our interest. This insurance may, but need not, also protect your interest. If the collateral becomes damaged, the coverage we purchase may not pay any claim you make or any claim made against you. You may later cancel this coverage by providing evidence that you have obtained property coverage elsewhere.

You are responsible for the cost of any insurance purchased by us. The cost of this insurance may be added to your contract or loan balance. If the cost is added to your contract or loan balance, the interest rate on the underlying contract or loan will apply to this added amount. The effective date of coverage may be the date your prior coverage lapsed or the date you failed to provide proof of coverage.

The coverage we purchase may be considerably more expensive than insurance you can obtain on your own and may not satisfy any need for property damage coverage or any mandatory liability insurance requirements imposed by applicable law.

IN WITNESS WHEREOF, the undersigned have executed this document on the date(s) set forth below.

Dated: May 26, 2022

Outdoorsuperstar, LLC

BY: _____
Ying Deng
Member

State of Oregon
County of Lane

This instrument was acknowledged before me on June 21, 2022 by Ying Deng, as Member for Outdoorsuperstar, LLC.

_____
Notary Public - State of Oregon

My Commission Expires: July 16, 2024

OFFICIAL STAMP
DONNA KATHLEEN VILLENA
NOTARY PUBLIC - OREGON
COMMISSION NO. 1002004
MY COMMISSION EXPIRES JULY 16, 2024

REQUEST FOR FULL RECONVEYANCE

TICOR TITLE COMPANY OF OREGON, A OREGON CORPORATION, TRUSTEE:

The undersigned is the legal owner and holder of all indebtedness secured by the within Deed of Trust. All sums secured by the Deed of Trust have been fully paid and satisfied; and you are requested and directed, on payment to you of any sums owing you under the terms of the Deed of Trust, to cancel all evidences of indebtedness, secured by the Deed of Trust, delivered to you, together with the Deed of Trust, and to reconvey, without warranty, to the parties designated by the terms of the Deed of Trust, all the estate now held by you under the same.

IN WITNESS WHEREOF, the undersigned have executed this document on the date(s) set forth below.

_____
Print Company Name

_____ _____
Signature Date

By: _____
Print Name

Its: _____
Print Title

_____
Print Company Name

_____ _____
Signature Date

By: _____
Print Name

Its: _____
Print Title

Please mail Reconveyance to: _____

Do not lose or destroy this Deed of Trust OR THE NOTE which it secures. Both original documents must be delivered to the Trustee for cancellation before reconveyance will be made.

RECORDING REQUESTED BY:
TICOR TITLE™
Company of Oregon

201 Central Avenue
Coos Bay, OR 97420

Coos County, Oregon	2022-05778
$101.00 Pgs=4	06/22/2022 01:24 PM
eRecorded by: TICOR TITLE COOS BAY	
Dirls D. Murphy, Coos County Clerk	

GRANTOR'S NAME:
Shun Chung Pun and Wai King Yeung

GRANTEE'S NAME:
Outdoorsuperstar, LLC

AFTER RECORDING RETURN TO:
Order No.: 360622039536-VR
Outdoorsuperstar, LLC, an Oregon limited liability company
PO Box 1345
Springfield, OR 97477

SEND TAX STATEMENTS TO:
Outdoorsuperstar, LLC
PO Box 1345
Springfield, OR 97477

APN: 955503
955504
955501
Map: 28S1417C001001
28S1417C001002
28S1417C001000
52185 Highway 101, Bandon, OR 97411

SPACE ABOVE THIS LINE FOR RECORDER'S USE

STATUTORY WARRANTY DEED

Shun Chung Pun and Wai King Yeung, as tenants by the entirety, Grantor, conveys and warrants to **Outdoorsuperstar, LLC, an Oregon limited liability company,** Grantee, the following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Coos, State of Oregon:

Parcels 1, 2 and 3 of Partition Plat 1999 #2, filed and recorded January 20, 1999, CAB C-266, as Instrument No. 1999-771, Coos County, Oregon.

TOGETHER WITH a non-exclusive easement for ingress and egress, including the terms and provisions thereof as set forth on the recorded partition, recorded January 20, 1999 as Instrument No. 1999-711, Records of Coos County, Oregon.

THE TRUE AND ACTUAL CONSIDERATION FOR THIS CONVEYANCE IS ONE MILLION AND NO/100 DOLLARS **($1,000,000.00).** (See ORS 93.030).

Subject to:

SEE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF

BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON TRANSFERRING FEE TITLE SHOULD INQUIRE ABOUT THE PERSON'S RIGHTS, IF ANY, UNDER ORS 195.300, 195.301 AND 195.305 TO 195.336 AND SECTIONS 5 TO 11, CHAPTER 424, OREGON LAWS 2007, SECTIONS 2 TO 9 AND 17, CHAPTER 855, OREGON LAWS 2009, AND SECTIONS 2 TO 7, CHAPTER 8, OREGON LAWS 2010. THIS INSTRUMENT DOES NOT ALLOW USE OF THE PROPERTY DESCRIBED IN THIS INSTRUMENT IN VIOLATION OF APPLICABLE LAND USE LAWS AND REGULATIONS. BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON ACQUIRING FEE TITLE TO THE PROPERTY SHOULD CHECK WITH THE APPROPRIATE CITY OR COUNTY PLANNING DEPARTMENT TO VERIFY THAT THE UNIT OF LAND BEING TRANSFERRED IS A LAWFULLY ESTABLISHED LOT OR PARCEL, AS DEFINED IN ORS 92.010 OR 215.010, TO VERIFY THE APPROVED USES OF THE LOT OR PARCEL, TO DETERMINE ANY LIMITS ON LAWSUITS AGAINST FARMING OR FOREST PRACTICES, AS DEFINED IN ORS 30.930, AND TO INQUIRE ABOUT THE RIGHTS OF NEIGHBORING PROPERTY OWNERS, IF ANY, UNDER ORS 195.300, 195.301 AND 195.305 TO 195.336 AND SECTIONS 5 TO 11, CHAPTER 424, OREGON LAWS 2007, SECTIONS 2 TO 9 AND 17, CHAPTER 855, OREGON LAWS 2009, AND SECTIONS 2 TO 7, CHAPTER 8, OREGON LAWS 2010.

STATUTORY WARRANTY DEED
(continued)

IN WITNESS WHEREOF, the undersigned have executed this document on the date(s) set forth below.

Dated: 6-21-2022

Shun Chung Pun

Wai King Yeung

State of Oregon
County of Lane

This instrument was acknowledged before me on June 21, 2022 by Shun Chung Pun and Wai King Yeung.

Notary Public - State of Oregon

My Commission Expires: July 16, 2024

OFFICIAL STAMP
DONNA KATHLEEN VILLENA
NOTARY PUBLIC - OREGON
COMMISSION NO. 1002004
MY COMMISSION EXPIRES JULY 16, 2024

EXHIBIT "A"
Exceptions

Subject to:

1. Easements, conditions, restrictions and notes as delineated on the recorded plat Final Partition Plat 1999 #2;

2. Any adverse claim based on the assertion that any portion of the subject land has been removed from or brought within the subject land's boundaries by the process of accretion or reliction or any change in the location of Coquille River.

   Any adverse claim based on the assertion that any portion of the subject land has been created by artificial means or has accreted to such portions so created, or based on the provisions of ORS 274.905 through 274.940.

   Any adverse claim based on the assertion that any portion of the subject land is now or at any time has been below the ordinary high water line of Coquille River.

   Rights of fishing, navigation, commerce, flood control, propagation of anadromous fish, and recreation, and other rights of the public, Indian tribes or governmental bodies in and to the waters of Coquille River.

3. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

   Granted to: Bandon Power Co. et al
   Purpose: Pipe lines
   Recording Date: November 7, 1927
   Recording No: Book 104, Page 56

4. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

   Granted to: Mountain States Power Company
   Purpose: Transmission lines
   Recording Date: February 3, 1948
   Recording No: Book 178, Page 55

5. Limited access to and from the Land as set forth in Deed shown below, which provides that there shall be no right of easement or right of access to, from or across the State Highway other than as expressly provided for in said Deed:

   Grantor: The Port of Bandon, a municipal corporation of Coos County, Oregon
   Grantee: State of Oregon, by and through its State Highway Commission
   Recording Date: January 21, 1959
   Recording No.: Book 269, Page 511

6. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

   Granted to: Pacific Power & Light Company
   Purpose: Utilities
   Recording Date: February 10, 1961
   Recording No: Book 283, Page 307

7. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

   Granted to: Roger J. Winters and Edith Winters
   Purpose: Discharge of drainage waters
   Recording Date: December 26, 1963
   Recording No: Book 306, Page 166

8. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

   Granted to: Dorothy M. Sheretz, et al
   Purpose: Pipe lines
   Recording Date: June 26, 1964
   Recording No: Book 310, Page 507

9. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

   Granted to: Sherertz Brothers, Inc.
   Purpose: Roadway to water pipelines
   Recording Date: July 16, 1984
   Recording No: 84-3-7672

10. Any easements or rights of way for existing utilities or other rights of way over those portions of said Land lying within the public right of way vacated by resolution or ordinance

    Recording Date: May 23, 1997
    Recording No: 97-05-0990

EXHIBIT "A"
Exceptions

11. Easement and maintenance agreement for the purpose(s) shown below and rights incidental thereto, as granted in a document:

Granted to:	William R. Manes and Riki Sue Manes and Ronald G. Johnson
Purpose:	Maintaining and repairing any of water works for the convenience and benefit of grantee
Recording Date:	October 19, 1998
Recording No:	1998-58205

12. Terms and provisions of the appurtenant easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

Granted to:	Indian Point, Inc.
Purpose:	common access road
Recording Date:	May 1, 2007
Recording No:	2007-5546

13. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

Granted to: LightSpeed Networks, Inc. dba LSN
Purpose: Telecommunications Line
Recording Date: September 16, 2013
Recording No: 2013-9106

14. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

Granted to:	Oregon Department of Environmental Quality
Purpose:	Easement and Equitable Servitudes
Recording Date:	March 13, 2018
Recording No:	2018-02392

NOTICE OF COMPLETENESS

Coos County Planning
60 E. Second.
Coquille, OR 97423
http://www.co.coos.or.us/
Phone: 541-396-7770

Friday, December 29, 2023

Outdoor Superstar, LLC
PO Box 1345
Springfield, OR 97477

RE: Completeness Review for HBCU-23-002

Dear Property Owner:

Thank you for submitting an Hearings Body Conditional Use. The first step in the application process is a completeness review. The following items were required to be included in your application or determined prior to the acceptance of the application:

☐ 1. The correct and completed application form was filed. If the proposed use/activity will occur in an identified hazard area the correct reports or certifications have been included. It appears as though the proposed "clubhouse" is to be sited in the Floodplain; however, this has not been addressed. Additionally, Recreational Vehicles within the Floodplain have criteria that shall be addressed. These criteria can be found starting on page 3

☒ Applications shall be submitted by the property owner or a purchaser under a recorded land sale contract. "Property owner" means the owner of record, including a contract purchaser. The application shall include the signature of all owners of the property. A legal representative may sign on behalf of an owner upon providing evidence of formal legal authority to sign; a consent form may be accepted.

☒ 2. One original and one exact unbound copy of the application or an electronic copy shall be provided at the time of submittal for all applications;

☒ 3. A detailed Project Proposal was provided;

☒ 4. A detailed parcel map of the subject property illustrating the size and location of existing and proposed uses, structures and roads on an 8½" x 11" paper to scale. Applicable distances must be noted on the parcel map along with slopes. (See example plot map);

☒ 5. Covenants or deed restrictions on the property were provided or were found not to exist.

6. All of the lots or parcels that are currently within the applicant's ownership, co-

☒ ownership or is purchasing which have a common boundary with the subject property on an assessment map were listed on the application;

☒ 7. A copy of the current deed of record has been provided;

☐ 8. All the applicable criteria have been addressed; The Floodplain criteria mentioned above was not addressed

☒ 9. The property was created legally;

☒ 10. All development was cited in compliance with the Coos County Zoning and Land Development Ordinance or this application will bring a use or activity into compliance; and

☒ 11. All road, driveway, access, parking plan or traffic impact analysis has been submitted as required by the Coos County Zoning and Land Development Ordinance.

This application has been:

☐ Deemed complete as of the date this letter was sent and the application has been forwarded to all applicable agencies or departments for comment; or

☒ Deemed incomplete due to missing information as shown by the unchecked boxes above. As the applicant for a permit or limited land use it is your responsibility to submit one of the following within 180 days from the date the application was receipted to the Planning Department:

a. All of the missing information;
b. Some of the missing information and written notice from the applicant that no other information will be provided; or
c. Written notice from the applicant that none of the missing information will be provided.

If the application is found to be incomplete and steps a, b or c are not completed within the required timeframe (180 days), then on the 181st day the application will be deemed void. If you submit material by email you are responsible to follow up with staff to ensure that information was received. On the day the department receives one of the options (a. through c.) above is the date your application will be considered complete.

Once your application has been deemed complete staff will continue with the review process. Your application will go through the following steps (checked steps apply to your application):

☐	1.	The first step is requesting comments from any applicable agency or department. Most agencies have 30 days to respond to comments.
☐	2.	If this is a land division Technical Review Committee (TRC) will be scheduled once all comments have been received. Once the TRC has been completed a tentative decision is mailed out approximately six (6) weeks after. The notice of tentative decision will provide for a fifteen (15) day opportunity to appeal. If appealed it will be scheduled for hearing. The decision only becomes final after the final partition plat has been filed.
☐	3.	If this is application requires a hearing, a notice of hearing will be provided 20 days prior to the hearing. Once the hearing is concluded a notice of decision will be mailed out within five to seven days. If this is a Planning Commission decision the notice will provide for an opportunity to appeal (15) fifteen days to the Board of Commissioners. If this is a Board of Commissioners decision there is a twenty-one (21) day appeal period to the Land Use Board of Appeals.
☐	4.	If this is an administrative review (Administrative Conditional Use, Extension, or Variance) a notice of decision with an opportunity to appeal will be mailed out once the review has been completed. Approximately, six weeks after the application has been deemed complete. The notice of decision will provide for a fifteen (15) day opportunity to appeal. If not appealed the decision becomes final. Property line adjustment discrete parcel 12 day opportunity to appeal.
☐	5.	If this is a limited land use notice then a notice requesting comments will be mailed as soon as the application has been deemed complete and then a review and decision will be issued. Approximately, four weeks after the comments time has expired. The notice of decision will provide for a fifteen (15) day opportunity to appeal. If not appealed the decision becomes final.

Except when an applicant requests an extension of the timelines, the governing body of the county or its designee shall take final action on an application for a permit or limited land use decision within 120 (urban zone) days or 150 (rural) days as applicable.

If you have questions about the land use process, please contact planning staff for assistance.

Thank you,
Amy Dibble
Planning Staff
C: File

SECTION 4.11.235 ESTABLISHMENT OF DEVELOPMENT PERMIT

1. Floodplain Application Required
   A floodplain application shall be submitted and approved before construction or regulated development begins within any area of special flood hazard established in Section 4.11.232. The permit shall be for all structures including manufactured homes, as set forth in the "DEFINITIONS," and for all development including fill and other activities, also as set forth in the "DEFINITIONS."
2. Application
   An application shall be made on the forms furnished by the Planning Department and may include, but not be limited to, plans in duplicate drawn to scale showing the nature, location, dimensions, and elevations of the area in question; existing or proposed structures, fill, storage of materials, drainage facilities, and the location of the foregoing. Specifically, the following information is required:
   a. Elevation in relation to mean sea level, of the lowest floor (including basement) of all structures which may be submitted by a registered surveyor;
   b. Elevation in relation to mean sea level of floodproofing in any structure;
   c. Certification by a registered professional engineer or architect that the floodproofing methods for any nonresidential structure meet the floodproofing criteria in Section 4.11.252; and
   d. Description of the extent to which a watercourse will be altered or relocated as a result of proposed development.
   e. Plot plan drawn to scale showing the nature, location and dimensions and elevation referenced to mean sea level, or NAVD 88, whichever is applicable, of the area in question including existing and proposed structures, fill, storage of materials, and drainage facilities. Applicants shall submit certification by an Oregon registered professional engineer or land surveyor of the site's ground elevation and whether or not the development is located in a flood hazard area. If so, the certification shall include which flood hazard area applies, the location of the floodway at the site, and the 100 year flood elevation at the site. A reference mark shall be set at the elevation of the 100 year flood at the site. The location, description, and elevation of the reference mark shall be included in the certification; and
   f. Any other information required to show compliance.
   g. Applications for variance, water course changes or staff determinations will be noticed with an opportunity to appeal in the same manner as a conditional use (see Chapter V). Non-discretionary determination of compliance with the standards will be processed in the same manner as a Compliance Determination (see Article 5.10)

SECTION 4.11.252 SPECIFIC STANDARDS

In all areas of special flood hazards where base flood elevation data has been provided (Zones A1-30, AH, and AE) as set forth in Section 4.11.232, BASIS FOR ESTABLISHING THE AREAS OF SPECIAL FLOOD HAZARD or Section 4.11.243(2), Use of Other Base Flood Data (In A and V Zones), the following provisions are required:

2. Nonresidential Construction
   New construction and substantial improvement of any commercial, industrial or other nonresidential structure shall either have the lowest floor, including basement, elevated at or above the base flood elevation; or, together with attendant utility and sanitary facilities, shall:
   a. Be floodproofed so that below the base flood level the structure is watertight with walls substantially impermeable to the passage of water;
   b. Have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy;

c. Be certified by a registered professional engineer or architect that the design and methods of construction are in accordance with accepted standards of practice for meeting provisions of this subsection based on their development and/or review of the structural design, specifications and plans. Such certifications shall be provided to the official as set forth in Section 4.11.243(3)(b);
d. Nonresidential structures that are elevated, not floodproofed, must meet the same standards for space below the lowest floor as described in 4.11.252(1)(b);
e. Applicants floodproofing nonresidential buildings shall be notified that flood insurance premiums will be based on rates that are one foot below the floodproofed level (e.g. a building floodproofed to the base flood level will be rated as one foot below);
f. Applicants shall supply a comprehensive Maintenance Plan for the entire structure to include but not limited to: exterior envelope of structure; all penetrations to the exterior of the structure; all shields, gates, barriers, or components designed to provide floodproofing protection to the structure; all seals or gaskets for shields, gates, barriers, or components; and, the location of all shields, gates, barriers, and components as well as all associated hardware, and any materials or specialized tools necessary to seal the structure; and
g. Applicants shall supply an Emergency Action Plan (EAP) for the installation and sealing of the structure prior to a flooding event that clearly identifies what triggers the EAP and who is responsible for enacting the EAP.

4. Recreational Vehicles

Recreational vehicles placed on sites are required to:

a. Be on the site for fewer than 180 consecutive days; and
b. Be fully licensed and ready for highway use, on its wheels or jacking system, is attached to the site only by quick disconnect type utilities and security devices, and has no permanently attached additions; or
c. Meet the requirements of Section 4.11.252(3) above and the elevation and anchoring requirements for manufactured homes.

OUTDOOR SUPERSTAR LLC
ADMINISTRATIVE CONDITIONAL USE
SUPPLEMENTAL APPLICATION DOCUMENT

APPLICATION OF OUTDOORSUPERSTAR LLC FOR AN ADMINISTRATIVE CONDITIONAL USE FOR A RECREATIONAL VEHICLE PARK

Organization of This Application

This application will be required to be heard by the Coos County hearings body. The hearing will be the first evidentiary hearing to review this application, exhibits and evidence submitted into the record to determine whether the requested amendment meets the applicable review criteria set forth in the Oregon Revised Statutes, Administrative Rules, Coos County Comprehensive Plan and Land Use and Development Ordinance (CCZLDO).

This application is organized and presented to the hearings body in accordance with the relevant review standards. Part 1 contains the introduction and background of this request. Part 2 addresses the requirements for consistency with the Q-REC zoning designation and the development standards located in CCZLDO Section 3.3.530. Part 3 addresses compatibility with adjacent uses and zoning districts. Part 4 will address the required Coos County Comprehensive Plan policies necessary to illustrate no adverse impacts on aquatic and natural features. Part 5 will evaluate will give findings towards studies produced to address overlays and onsite suitability. Consequently, in the discussion of the criteria under the County Land Use and Development Ordinance, where there is overlap in review standards, reference is made back to the relevant goal discussion to avoid needless repetition. Applicant's exhibits and figures are contained at the end of this application document. These exhibits are arranged to follow the flow of the Statewide Planning Goals.

I. INTRODUCTION & BACKGROUND

This matter comes before the Coos County Hearings Body on application filed by Outdoor Superstar LLC herein referred to as Applicant, which is owner of the subject property. The 25.60-acre property is located on the east side of State Highway 101 approximately 0.75 miles northeast of the City of Bandon. The subject property is identified in the Coos County Assessor's records as Tax Lot 1000, 1001 and 1002, Section 17C, Township 28 South, Range 14 West, Property I.D. No(s) 955501, 955503 and 955504 respectively.

The applicant is requesting a 130 recreational vehicle park with associated amenities which falls under the development criteria of CCZLDO Section 3.3.530 (Administrative Conditional Use). The subject property is designated Q-REC (Recreation with Qualifications) and has additional coastal designations (Coquille River Estuary Management Plan (CREMP), CREMP Aquatic D08/D17 Conservation, CREMP Industrial and CREMP Shoreland Segment 16). The subject property is also subject to a number of Overlays including Archaeological Areas of Interest, Bandon Area of Mutual Interest, Bird Site Goal 5 Requirement, Floodplain, National Wetland Inventory Site and Natural Hazard Tsunami and Wildfire.

The requested Administrative Conditional Use as set out in the Coos County Zoning and Land Development Ordinance (CCZLDO) is primarily intended provide for an enhanced recreational opportunity in close proximity to the Coquille River and to utilize the maximum potential of the subject property with a comprehensive project consistent with the goals and policies of qualified recreationally zoned properties.

II. Q-REC CRITERIA AND SITE PLAN REVIEW

SECTION 3.3.530 DEVELOPMENT AND USE STANDARDS. The following are development standards for the CREMP-RC shoreland segments.

1. *Minimum Lot size:*

    a. *Refer to CREMP lot size Special Consideration Map.*
    b. *The dimension requirements must be meet.*

2. *Minimum Street frontage and minimum lot width is 20 feet.*

3. *Front setback is 20 feet.*

4. *Building height does not have any requirement, except those sites abutting a residential or controlled development zone shall have a max height of 35 feet plus one (1) additional*

III-478 Return to Top of Document foot in height for each foot of setback exceeding 5 feet (i.e. if the setback is 10, the maximum building height would be 40 feet). However, spires, towers, domes, steeples, flag poles, antennae, chimneys, solar collectors, smokestacks, ventilators or other similar objects may be erected above the prescribed height limitations, provided no usable floor space above the height limits is thereby added. Such over height object shall not be used for advertising of any kind.

FINDING: The proposed development does not include division of the subject property nor any structural development that is not consistent with the setback requirements as set forth above. The conceptual plan attached shows all recreational vehicle spaces are located well within the setback requirement. In addition, the permanent structural development that constitutes amenities to the RV Park (restroom units, clubhouse, sports courts and security unit) are all setback a minimum of 50 feet from any property line.

5. Access and parking is regulated in chapter VII.

FINDING: Access and parking will be proposed and development consistent with the requirements set forth in Chapter VII, see attached conceptual plan.

6. Riparian Vegetation Protection. Riparian vegetation within 50 feet of a estuarine wetland, stream, lake or river, as identified on the Coastal Shoreland and Fish and Wildlife habitat inventory maps, shall be maintained except that:

   a. Trees certified as posing an erosion or safety hazard. property owner is responsible for ensuring compliance with all local, state and federal agencies for the removal of the tree.

   b. Riparian vegetation may be removed to provide direct access for a waterdependent use.

   c. Riparian vegetation may be removed in order to allow establishment of authorized structural shoreline stabilization measures.

   d. Riparian vegetation may be removed to facilitate stream or streambank clearance projects under a port district, ODFW, BLM, Soil & Water Conservation District, or USFS stream enhancement plan.

   e. Riparian vegetation may be removed in order to site or properly maintain public utilities and road right-of-ways. or

   f. Riparian vegetation may be removed in conjunction with existing agricultural operations (e.g. to site or maintain irrigation pumps, to limit encroaching brush, to allow harvesting farm crops customarily grown within riparian corridors, etc.) provided that such vegetation removal does not encroach further into the vegetation buffer except as needed to provide an access to the water to site or maintain irrigation pumps.

g. The 50 foot riparian vegetation setback shall not apply in any instance where an existing structure was lawfully established and an addition or alteration to said structure is to be sited not closer to the estuarine wetland, stream, lake, or river than the existing structure and said addition or alteration represents not more than 100% of the size of the existing structure's "footprint".

h. Riparian removal within the Coastal Shoreland Boundary will require a conditional use. See Special Development Considerations Coastal Shoreland Boundary.

i. The 50' measurement shall be taken from the closest point of the ordinary high water mark to the structure using a right angle from the ordinary high water mark.

FINDING: **The proposal does not involve disturbing or encroaching upon the 50-foot riparian vegetation protection area. The high bank area has been located and the conceptual plan demonstrates sufficient setback beyond the 50 foot requirement for all structural development. A dock project may be proposed in the future which will necessitate addressing the requirements of subsection 6, and the associated state and local permits however, the current proposal does not involve disturbing such areas.**

SECTION 5.6 DESIGN AND SITE PLAN REVIEW

SECTION 5.6.100. Purpose. The purpose and objectives of site development requirements and the site design review procedure are to:

1. Encourage originality, flexibility and innovation in site planning and development, including the architecture, landscaping and graphic design of said development;

2. Conserve the County's natural beauty and visual character and charm by insuring that structures and other improvements are properly related to their sites, and to surrounding sites and structures, with due regard to the aesthetic qualities of the natural terrain and landscaping, and that proper attention is given to exterior appearances of structures and other improvements;

3. Protect and enhance the County's appeal to tourists and visitors and thus support and stimulate business and industry and promote the desirability of investment and occupancy in marine and industrial properties;
4. Stabilize and improve property values and prevent blighted areas and thus increase tax revenues;

5. Achieve the beneficial influence of pleasant environments for living and working on behavioral patterns and, thus, decrease the cost of governmental services;

6. Foster civic pride and community spirit so as to improve the quality and quantity of citizen participation in local government and in community growth, change and improvement;

7. Sustain the comfort, health, tranquility and contentment of residents and attract new residents by reason of the County's favorable environment;

8. Assure that proposed structures are harmonious with the applicable zoning; and thereby promote and protect the health, safety and welfare of the County; and

9. Protect riparian vegetation which is needed to stabilize the shoreline and to maintain water quality and temperature necessary for the maintenance of fish habitat and spawning areas.

FINDING: The standards set forth in 5.6.100 1 through 9 have been factored into the development and are demonstrated in ample regard on the site plan. The property owner has placed the highest priority on ensuring the beautification of the property through a sound proposal and detailed plans in order to facilitate to aesthetically pleasing features to protect the integrity of surrounding areas. There has been a conscious effort to craft a plan that will focus on attracting new residents by instituting a development plan that will focus on the elements of the aforementioned criteria.

SECTION 5.6.200. Site Review and Approval Criteria. The County finds that excessive uniformity, dissimilarity, inappropriateness or poor quality of design in the exterior appearance of structures and the lack of proper attention to site development and landscaping in the: industrial and airport operations zone districts hinders the harmonious development of the County, impairs the desirability of residence, investment or occupation in the County, limits the opportunity to attain the optimum use and value of land and improvements, adversely affects the stability and value of property, produces degeneration of property in such areas with attendance deterioration of conditions affecting the health, safety and welfare of the County, and destroys a proper relationship between the taxable value of property and the cost of services thereof.

Further, the County finds that riparian vegetation is a resource which has been identified in the Comprehensive Plan.

FINDING: Refer to the attached conceptual plan that shows consistency with the intent of Section 5.6.200. There has been a significant effort to craft a plan that will add to the County in this area by utilizing landscaping features that will allow for attraction not deterrent.

SECTION 5.6.300. Jurisdiction.

1. Within any zone designation requiring a site plan review, no building permit or verification letter shall be issued for the erection or construction of a permitted or conditional use until the plans, drawings, sketches and other documents required under Section 5.6.500 have been approved by the Planning Director in conformity with the criteria specified in Section 5.6.400 (Criteria and Standards). For the purpose of this Section "Construction" shall include any remodeling that substantially changes the exterior appearance of the building.

2. Construction, site development and landscaping shall be carried out in substantial accord with the plans, drawings, sketches and other documents as approved.

3. Nothing in this subsection shall be construed to prevent ordinary repair, maintenance and replacement of any part of the building or landscaping which does not involve a substantial change from the purpose and objectives of Section 5.6.100. Proposed "substantial changes" shall be submitted to the Planning Director for approval.

4. All variances from the site development criteria which are deemed necessary by the applicant shall be requested pursuant to ARTICLE 5.3.

FINDING: The applicant/property owner has developed a plan that reflects consistency with all the necessary requirements located in CCZLDO and intends to carry in out with specificity upon receiving a tentative approval with conditions. All construction and development will directly correlate with Coos County condition compliance prior to the anticipation of receiving a Zoning Compliance Letter.

SECTION 5.6.400. Site Development Criteria and Standards. These standards are intended to provide a frame of reference for the applicant to the development of a site and building plans as well as a method of review. These standards shall not be regarded as inflexible requirements, nor do they advocate any particular architectural style, for they are intended to encourage creativity, invention and innovation. The following standards shall be utilized in reviewing the plans, drawings, sketches and other documents required under Section 5.6.500:

1. Landscaping.

a. The landscape shall be such to minimize soil erosion and lessen the visual impact;

b. any grade changes shall be in keeping with the general appearance of neighboring developed areas.

FINDING: The proposed landscaping proposed for the development will have no adverse impacts on the soil composition and have no visual impacts. In addition, all grading activities will be orchestrated in such a way as to be consistent with the general appearance of neighboring developing areas.

2. Structures.

a. Proposed structures shall be related harmoniously to the terrain and to existing buildings in the vicinity that have a visual relationship to the proposed buildings;

FINDING: Permanent structural development with only consistent of amenities typically associated with recreational vehicle park development. These structures include restroom units, a security unit and sports court areas. There are other nominal development areas that will entail two dog parks and a recreational fire pit area. The subject property is well suited to where this development will have a visual obstruction mainly due to natural features in the area (forest and river activity). The applicant finds that the development is consistent with Section 5.6.300.1.

b. the achievement of such relationship may include the enclosure of space in conjunction with other existing buildings or other proposed buildings and the creation of focal points with respect to avenues of approach, terrain features or other buildings.

FINDING: The proposed structural development will effectively tie the project together. Each structure will be in a location that has been carefully

considered due to the terrain and landscape and the Coos County applicable regulations.

3. Drives, Parking and Circulation. With respect to vehicular and pedestrian circulation, including walkways, interior drives and parking, special attention shall be given to the location and number of access points, general interior circulation, separation of pedestrian and vehicular traffic, and arrangement of parking areas that are safe and convenient.

FINDING: The subject property has existing access the proceeds directly off State Highway 101 and travels north easterly and caters specifically to the property. The proposed development encompasses instituting an onsite circulation plan that will allow consistency with CCZLDO and avoid any safety conflicts. Access into the property currently has 25-30 foot right of way width and the proposed improved onsite road is proposed to have a 26 foot right of way width allow for ingress and egress for future patrons. The lower and upper parts of the RV Park have several east/west roads that are currently 18 feet in width that are only utilized to access the recreational vehicle spaces directly adjacent. The main areas where intensified circulation will be developed to 26 feet. Parking areas will be facilitated in the normal regard as it relates to a RV Park type development. Parking spaces will be facilitated to each RV Park space along with ample 9' X 18' spaces for guests located in amenity areas. The proposal will also include ensuring the requirement amount of ADA assessable spaces are installed.

4. Surface Water Drainage. Special attention shall be given to proper site surface drainage so that removal of surface waters will not adversely affect neighboring properties, the public storm drainage system, or create environmental problems.

FINDING: The subject property is not located within an urban area where storm water facilities are available. The development proposes to mitigate runoff patterns on site. There will not be adverse impacts to neighboring properties directly related to drainage. The process will require calculating pre and post development cubic foot per second runoff numbers with the intent to ensure the project will not cause increase runoff in the area dispute the unavailability of storm connection. The development will be consistent with Section 5.6.300.4.

5. Utility Service.

a. Whenever feasible, electric, telephone and other utility lines shall be underground;

FINDING: All electrical and utility lines are proposed to be installed underground. The development is proposed to be consistent with Section 5.6.300.5

b. any utility installations remaining above ground shall be located so as to have an harmonious relation to neighboring properties and the site;

FINDING: There is no proposal for utility or electrical lines to be above grade.

c. the proposed method of sanitary sewage disposal from all buildings shall be indicated.

FINDING: The applicant/property are currently going through a Department of Environmental Health permitting process for a site evaluation. The development will include an onsite sanitation system that can properly treat the full capacity of the project.

6. Special Features.

   a. Exposed storage areas, exposed machinery installations, service areas, truck loading areas, utility buildings and structures and similar accessory areas and structures shall be subject to such setbacks, screen plantings or other screening methods as shall be reasonably required to prevent their being incompatible with the existing or contemplated environment and the surrounding properties;

   b. service, processing, and storage on property abutting a residential zone or commercial zone shall be wholly within an enclosed building or screened from view from such zone, street or highway by a permanently maintained, sight obscuring device or vegetation.

7. Application of Design Standards. The standards of review outlined in (1) to (6) above also apply to all accessory buildings, structures, exterior signs and other site features however related to the major buildings or structures.

8. Riparian Vegetation Protection:

   a. Riparian vegetation within 50 feet of a estuarine wetland, stream, lake or river, as identified on the Coastal Shoreland and Fish and Wildlife habitat inventory maps, shall be maintained except that:

      1) Trees certified by the Coos Soil and Water Conservation District, a port district or U.S. Soil Conservation Service posing an erosion or safety hazard may be removed to minimize said hazard; or

      2) Riparian vegetation may be removed to provide direct access for a water dependent use; or

      3) Riparian vegetation may be removed in order to allow establishment of authorized structural shoreline stabilization measures; or

      4) Riparian vegetation may be removed to facilitate stream or streambank clearance projects under a port district, ODFW, BLM, Soil & Water Conservation District, or USFS stream enhancement plan; or

      5) Riparian vegetation may be removed in order to site or properly maintain public utilities and road right-of-ways, provided that the vegetation to be removed is the minimum necessary to accomplish the purpose; or

      6) Riparian vegetation may be removed in conjunction with existing agricultural operations (e.g., to site or maintain irrigation pumps, to limit encroaching brush, to allow harvesting farm crops customarily grown within riparian corridors, etc.) provided that such vegetation removal does not encroach further into the

vegetation buffer except as needed to provide an access to the water for the minimum amount necessary to site or maintain irrigation pumps.

c. The 50 'riparian vegetation setback shall not apply in any instance where an existing structure was lawfully established and an addition or alteration to said structure is to be sited not closer to the estuarine wetland, stream, lake, or river than the existing structure and said addition or alteration represents not more than 100% of the size of the existing structure's "footprint." [OR 92-05-009PL]

Q-REC STANDARDS FOR QUALIFERS ON THE PROPERTY

1. Development on the subject property shall be subject to design and site plan review pursuant to Section 5.6.400 of the CCZLDO to be considered through a Hearings Body Review;

FINDING: Section 5.6.400 of the CCZLDO has been previously addressed. The property owner and applicant are prepared to offer testimony and presentation at a Planning Commission Hearing related to the proposed application.

2. The proposed rule uses, density, and public facilities and services will not commit adjacent or nearby resource land to non resource use as the term is defined in OAR 660-004-0028;

FINDING: An areawide analysis has been completed and covered in the next portion of the application materials. There is no proposal for division or conversion of the zone and therefore, consistency with Goal 2 is not applicable no the requirement to take an exception as determined by OAR 660-004-0028. All adjacent zoning districts and uses will be unaffected by the proposed application. See next section.

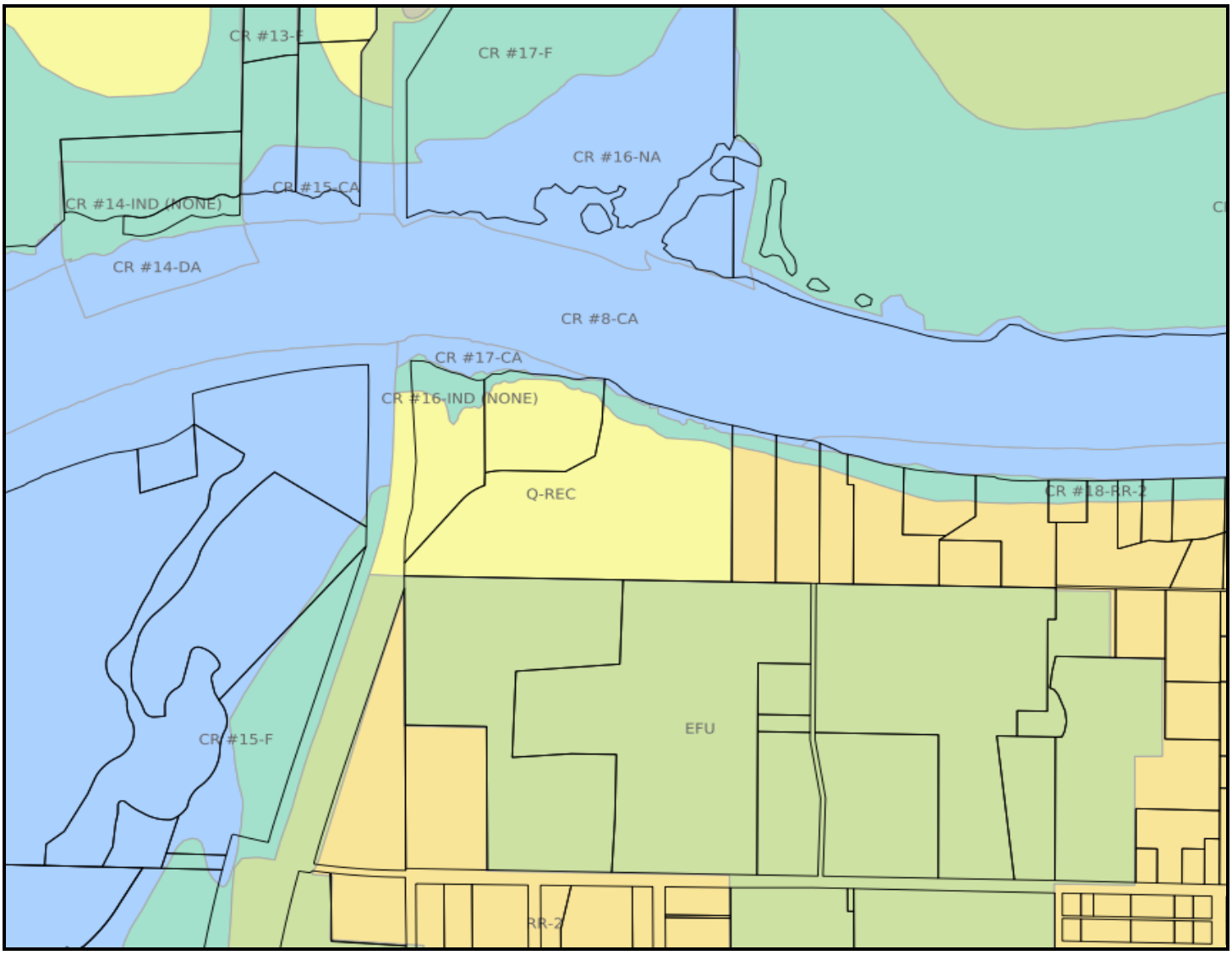
3. The proposed rural uses, densities, and public facilities and services are compatible with adjacent or nearby resource uses; and

FINDING: Please see the proceeding section for a comprehensive area wide analysis to illustrate compatibility.

4. The proposed rural uses will not seriously interfere with permitted uses on other nearby parcels.

FINDING: The application is for a recreational vehicle park that is consistent with the underlying zoning designation of Q-REC. As previously stated, the property has a dormant industrial use that creates more conflict and intensity than the proposal. Please see next section.

III. AREA CONSISTENCY AND COMPATIBILTY ANALYSIS



The subject property has a zoning designation of Q-REC that was created during a previous plan amendment and zone change application process. The property also has other zoning designations that are coastal and aquatic related, but will not particularly be hindered due to the development activities as the proposal taking place wholly and entirely with the Q-REC designated area. The zoning map above illustrates the zoning in the surrounding area. Directly to the north is the Coquille River and the next property beyond the river area is more than 700 feet. The river acts as a natural feature and buffer, however, the illustration of compatibility exits on the property directly to the north beyond the river. The property is zoned REC (recreational) and currently has an active recreational vehicle park (Coquille River RV Park) which has 48 recreational vehicle spaces along with an event center, a host structure and bathroom amenities.

Directly to the west is a significant roadway, State Highway 101 under the jurisdiction of the Oregon Department of Transportation. This road sits higher in elevation acting as a visual obstruction for the

property for any areas further to the west. Beyond the road are areas under the ownership and jurisdiction of the public and do not constitute private property. The composition of the area along with the hydraulic soils features render them incapable of any viable development and therefore, they act essentially as an extension of the river.

Directly to the south and adjacent are properties zoned for Exclusive Farm Use. The subject property had a previous use that was industrial in nature and during the active years of this operation caused no confliction or detriment to adjacent potential farm uses. The proposed development is considered less intensified in every respect as compared to an industrial type use. A closer look at the land and soil conditions to the EFU areas to the south would appear to hinder the ability to properly farm under any ORS 215.283 approved farm uses. However, there are some farm uses that are common with soil that is more hydraulically saturated. This particular property is currently receiving special assessment for active cranberry bogs. The proposed operation will create no conflict to the existing cranberry bog. Access points are completely separate and as previously explained, a recreational vehicle park is significantly less intense in regards to traffic, odor and noise than an industrial operation.

The nature of the proposed recreational vehicle park and how its currently planned is consistent with rural planning. There are no urban features related to the development. There are 130 recreational vehicle spaces proposed along with several structures that act as accessory. The subject property is currently 25.60 acres in size and with 130 spaces, it averages to be approximately 6 spaces per acre. There are no permanent residential components to the development, all recreational vehicle spaces are considered transient in nature and no park model type structural development is included. The property owner and applicant are determined to maintain the rural nature of the area and therefore, have proposed a plan that will allow for the perpetuation of those features.

Directly to the east are properties that are currently zoned Rural Residential – 2 Acre. These properties have a Goal 14 Urbanization exemption and constitute a pre-existing rural residential development. The residential nature of the land extends a significant distance easterly. There is only approximately an 80 acre area that is zoned EFU, the remaining areas around are all zoned RR2 and dedicated to residential use. The rural residential area surrounds the aforementioned 80 acres in almost an irrevocably committed fashion, see previous zoning map. This further illustrates the proposed development will be

consistent and compatible with adjacent zoning designation districts and uses and will cause no detriment to the minor potential farm use taking place to the south.

The applicant/property owner finds that the project is compatible with surrounding areas and uses. Furthermore, if minor compatibility issues are identified, they can be mitigated with reasonable conditions of approval.

COMPLIANCE WITH THE STATEWIDE PLANNING GOALS

The Statewide Planning Goals have been acknowledged as being applicable to the Coos County Comprehensive Plan. A proposal to amend the Comprehensive Plan and Zone must comply with all applicable Statewide Planning Goals unless an exception to one or more of the goals is proposed. There is no exception being proposed as part of this application. Coos County must make findings that Applicant's proposal complies with each of the relevant goals. The following information regarding the Statewide Planning Goals shows how this request complies with them.

Goal No. 1 - Citizen Involvement

To ensure the opportunity for citizen involvement in all phases of the planning process.

Coos County will provide written notice of the requested Administrative Conditional Use to surrounding property owners within 250 feet of the subject property not less than twenty days prior to the scheduled date of the first public hearing, and will cause public notice of Applicant's request and the scheduled public hearing to be published in the local newspaper pursuant to the requirements of CCZLDO Chapter 5, Section 5.0.900. Notice will also be given to affected state and local agencies, and other individuals and organizations that are legally entitled to such notice. These various forms of individual and public notice assure that local citizens have an opportunity to become informed about, and participate in, the public hearing process. The requested Administrative Conditional Use is being processed in a manner that assures full compliance with Statewide Goal No. 1.

Goal No. 2 - Land Use Planning

To establish a land use planning process and policy framework as a basis for all decisions and actions related to the use of land and to assure an adequate factual base for such decisions and actions.

Coos County has established policies and procedures, which require a detailed evaluation of any proposal to amend its Comprehensive Plan. Specific criteria and standards have been set forth

against which Applicant's amendment request must be evaluated in the light of relevant Findings of Fact. The County's ultimate decision in this matter will be based on the weight of those relevant Findings. As was noted in the introduction section of this document the proposed Administrative Conditional Use involves the conversion of 25.60 acres of land for a 130 space recreational vehicle park. The area proposed property is already considered recreational land.

The requested Administrative Conditional Use are being evaluated in a manner that assures full compliance with Statewide Goal No. 2.

Goal No. 3 - Agricultural Land

To preserve and maintain agricultural lands. Agricultural lands shall be preserved and maintained for farm use, consistent with the existing and future needs for agricultural products, forest and open space and with the state's agricultural land use policy expressed in ORS 215.243 and 215.700.

The land proposed for amendment is currently designated Q-REC land by the Coos County Comprehensive Plan and is therefore not protected as a Goal 3 resource. This finding is validated by the fact that the site has been determined to be non-resource land suitable for rural residential use and subsequently included within the County inventory of rural residential lands site as evidenced by the Coos County Comprehensive Plan. The proposed Administrative Conditional Use des not conflict with Statewide Goal No. 3.

Goal 4 - Forest Lands

To preserve forest lands for forest use.

The land proposed for amendment is currently designated Q-REC land by the Coos County Comprehensive Plan and is therefore not protected as a Goal 4 resource. This finding is validated by the fact that the site has been determined to be non-resource land suitable for recreational use and subsequently included within the County inventory of rural residential lands site as evidenced by the Coos County Comprehensive Plan. The proposed Administrative Conditional Use does not conflict with Statewide Goal No. 4.

On the basis of these findings, the subject property is not forestland as defined by Goal 4.

Goal No. 5 - Open Space, Scenic and Historic Areas, and Natural Resources

To conserve open space and protect natural and scenic resources.

Goal 5 addresses a variety of resources not specifically covered in other goals and sets out a process requiring inventory and evaluation. Steps in the process require that the level of significance of resources is determined, and if an identified resource appears to be significant, further evaluation is required. Such evaluation may lead to alternative courses of action, including fully protecting the identified resource.

Goal 5 addresses the following resources:

1. Open space.
2. Mineral and aggregate resources.
3. Energy resources.
4. Fish and wildlife areas and habitats.
5. Ecologically and scientifically significant resources.
6. Outstanding scenic views and sites.
7. Water areas, wetlands, watersheds and groundwater resources.
8. Wilderness areas.
9. Historic areas, sites, structures and objects.
10. Cultural areas.
11. Oregon recreational trails.
12. Wild and scenic waterways.

All of Coos County, including Applicant's property, has previously been subjected to extensive surveys and analyses intended to inventory and evaluate the Goal 5 resources listed above. These inventories, which are incorporated into the Coos County Comprehensive Plan, have previously received acknowledgment of compliance with Statewide Goal 5. Nevertheless, Applicant has conducted an independent evaluation of the potential impact of the proposed ACU on Goal 5 resources and proposes the following findings:

1. Land Needed or Desirable for Open Space

The subject property is typical of the majority of the lands in the western area of Coos County and contains no identified topographic or vegetative features that warrant protection under Goal 5. There is a large amount of land, which shares these same general characteristics surrounding the subject property. The proposed recreational vehicle park would result in an insignificant impact on open space resources in the surrounding area due to the abundant supply of open space with similar natural features. The site has not previously been identified by either the Coos County Comprehensive Plan as being needed or desirable for open space.

2. Mineral and Aggregate Resources

No mineral or aggregate resources requiring Goal 5 protection have been identified on or in the vicinity of the subject site.

3. Energy Sources

Goal 5 energy resources refers to sites and resources for the generation of energy (i.e. natural gas, oil, coal, hydroelectric, geothermal, uranium, and solar). No known energy sources have been identified on or in the vicinity of the property. The property does have solar access, but no more so than most other land in Coos County.

4. Fish and Wildlife Areas and Habitat

The subject property is adjacent to the Coquille River and the natural feature is position to the north. The County has found it necessary to place the following zoning designations to offer protections and additional regulations on natural features: (Coquille River Estuary Management Plan (CREMP), CREMP Aquatic D08/D17 Conservation, CREMP Industrial and CREMP Shoreland Segment 16). The site plan illustrates that the development will be constructed to allow no disturbance or hinderance on river or aquatic life. The proposed recreational vehicle park will be setback a sufficient distance from the river to maintain the necessary protections of the natural features. There have also been additional studies that give further evidence of the proposed projects consistency that will be addressed later in this report.

5. Ecologically and Scientifically Significant Natural Areas

No identified ecologically or scientifically significant natural areas are present on or in the vicinity of the subject site. As previously discussed, the Coquille River is positioned directly to the north, but the project offers no encroachment of any kind on river or aquatic life. The site plan gives full credence to a development offering no encroachment of any kind.

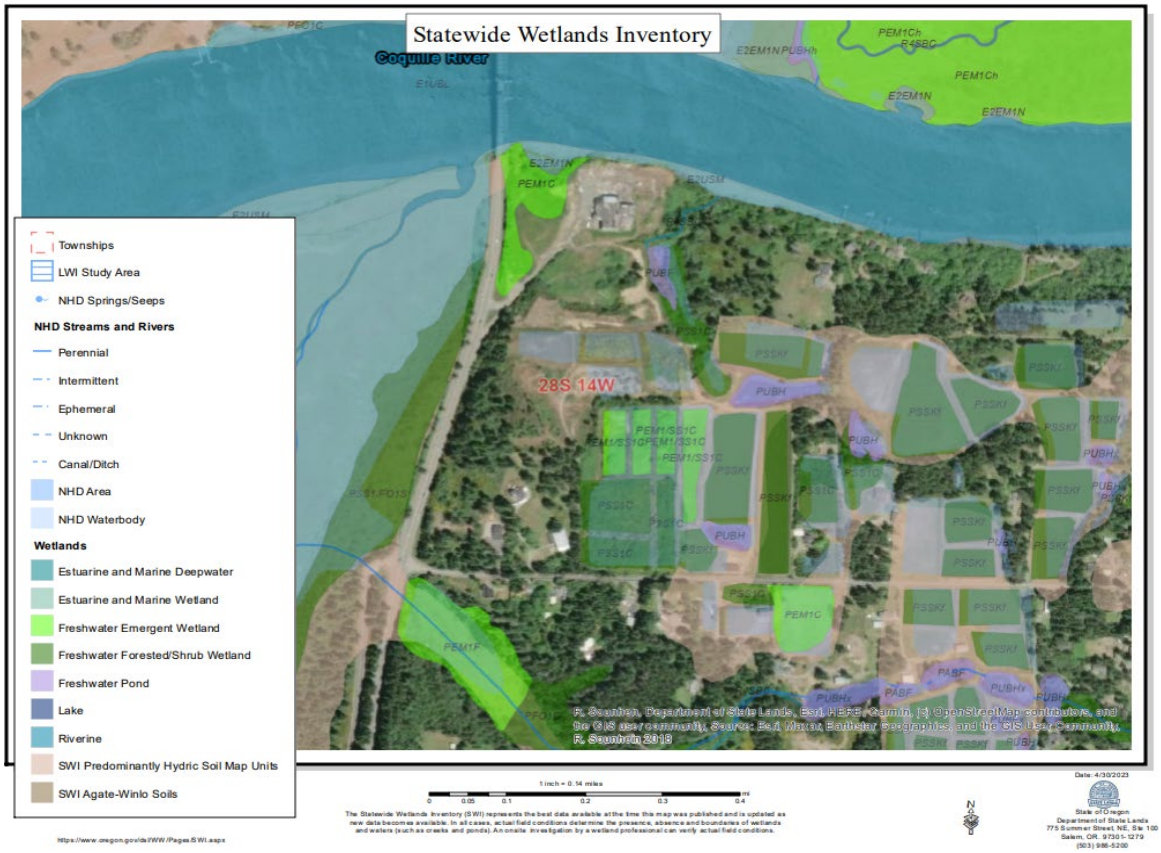
6. Outstanding Scenic Views and Sites

No identified scenic views or sites exist on the subject property. As noted under Open Space, above, the site has so much in common with many other locations in the general area that its scenic value is not considered unique or significant. The property possesses no prominent topographic features or vegetation, which would otherwise give it scenic significance.

7. Water Areas, Wetlands, Watersheds, and Groundwater Resources

The subject property contains no water areas (apart from the Coquille River previously discussed), watersheds or identified groundwater resources. Groundwater drawdown is minimized because of the large amount of incoming water, the redirection of runoff and used

water into the aquifer through engineered drainage and subsurface disposal, and maintenance and enhancement of existing vegetation cover. No complaints concerning depletion of water resources in adjacent similar areas have occurred. In order for an area to meet the Army Corps of Engineers' and the Oregon Division of State Lands' definition of wetland, three elements must be present: 1) water, 2) hydric soils, and 3) wetland vegetation. As identified below, the property has been identified to have some potential wetland features. A wetland delineation was conducted by Loran Waldron, certified biologist and the following was determined, 1) there are no wetlands or waters within the study area, which consists of the entire concrete slab that made up the working flood of the old wood products mill, 2) the entire road to the RV Park will remain within the established footprint of the access road to the old mill site, 3) no wetlands or waters of the state or United States are located within the project site study area and no wetlands or waters of the State or the United States will be impacted by this project, as currently planned.



8. Wilderness Areas

The subject site is not within, adjacent to, or part of, a designated wilderness area.

9. Historic Areas, Sites, Structures, and Objects

There are no identified or inventoried historic structures or objects on, or adjacent to, the subject property.

10. Cultural Areas

There are no identified or inventoried archaeological or cultural resources on the subject site.

11. Potential and Approved Oregon Recreation Trails

There are no designated or planned recreational trails on or adjacent to the subject site.

12. Wild and Scenic Waterways

The site is not within any designated or planned wild and scenic waterway, nor has such a designation been given to other lands or resources in the general vicinity of the subject property.

Based on the foregoing findings, there is no Goal 5 resource present requiring preservation action. The requested ACU will not conflict with any identified Goal 5 resources. The subject property has not been included in any inventory of needed open space or scenic areas, nor has it been identified in the Comprehensive Plan as having any historic, cultural or significant natural resources which need to be preserved and/or protected.

Goal No. 6 - Air, Water and Land Resources Quality

To maintain and improve the quality of the air, water and land resources of the state.

Statewide Goal 6 requires that air, land and water resources of the State be maintained and improved by assuring that future development, in conjunction with existing development, does not violate applicable state and federal environmental quality standards, and does not exceed the carrying capacity of local air sheds, degrade land resources or threaten the availability of such resources.

Any future land use activities on the property will be required to comply with all local, state and federal environmental regulations, thus assuring that the proposed ACU will not adversely impact the carrying capacity of local air sheds, degrade land and water resources or threaten the availability of such resources. Although the proposed rural residential land use designation on the property may result in at least some potential for environmental impacts if not properly monitored and regulated, both Coos County and the State of Oregon have sufficient regulatory measures in place so as to ensure that subsequent development will not produce any

unanticipated impacts. The proposed ACU has been evaluated in a manner that assures full compliance with Statewide Goal No. 6.

Goal No. 7 - Areas Subject to Natural Disasters and Hazards

To protect life and property from natural disasters and hazards.

The subject property has been identified as being within any identified floodplain area. Furthermore, the type of floodplain designation is considered an unnumbered A zone or an approximate A zone. This means floodway data is not available and development of this kind requires a one-foot cumulative effort analysis. This will be discussed at a later point in these findings. The property owner and applicant can assert in conjunction with Goal 7 that the development will not cause any detriment to a natural feature and poses no conflict with areas inundated by the floodplain. A HEC-RAS and floodway analysis has been completed by James Heyen, Registered Engineer in the State of Oregon that has dictated no rise will be created as a direct result of the proposed development.

Goal No. 8 - Recreational Needs

To satisfy the recreational needs of the citizens of the state.

Recreational needs for the general public have been provided for on numerous sites in the coastal area surrounding the subject property including Bandon Dunes Golf Course and the general areas of coastal features directly to the west. The Coos County Comprehensive Plan has not identified the subject property on any inventory for recreational facilities or opportunities, however the nature of the underlying proposes is to facilitate directly to this particular goal and creates uniform consistency. The proposed amendment will not conflict with Statewide Goal No. 8.

Goal No. 9 - Economy of the State

To diversify and improve the economy of the state.

The Statewide Economic Development Goal requires that local land use plans "*provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies*". Goal 9 is intended to be applied on a County-wide basis and requires that future economic growth be accommodated, in part, by ensuring that there is sufficient suitable land planned and zoned for commercial and industrial uses. The proposed Administrative Conditional Use do not involve, or otherwise impact, the county's

inventory of lands needed for economic development. The amendment and zone change will not conflict with the Statewide Economic Development Goal.

Goal No. 10 - Housing

To provide for the housing needs of the citizens of the state.

The primary purpose of Goal 10, within the context of amending the Comprehensive Plan, is to ensure that sufficient buildable land is available to allow for the full range of housing needs within the County to avoid creating shortages of residential land which would artificially restrict market choices in housing type, price range or location. The Coos County Comprehensive Plan requires that population growth be monitored and assessed for impacts on previous estimates of needed housing and the availability of sufficient land for residential use. As previously noted, the subject 25.60 acre site previously had an industrial operation that is no longer active. No existing housing will be displaced as a consequence of the proposed recreational vehicle park. The current zoning on the property is Q-REC which allows for specific uses and determined when it transition from another zone through a quasi-judicial process. However, consistency with Goal 10 can be well demonstrated with a recreational vehicle park due to the nature of the project. Housing, although transient in nature is provided in some fashion. Although RV spaces and uses are not permanent, it does allow residential convenience on a temporary basis.

Goal No. 11 - Public Facilities and Services

To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban development.

Statewide Goal No. 11 concerns the public facilities and services aspects of amending the Comprehensive Plan designation on the subject property from farm use to rural commercial use, and requires consideration of a system or plan that ensures the proper coordination of the types, locations and delivery of public facilities and services that best support existing and proposed land uses.

Applicant's property is situated in a rural area where public facilities and services are relatively limited, compared with the broad ranges of services that are available in urban areas. There are no public sanitary sewers in the vicinity of the property; however, the relatively low density of development permitted by the proposed rural residential designation and zoning on both the subject property and other surrounding rural residential properties facilitates the use of individual

subsurface septic systems subject to standards enforced by the Oregon Department of Environmental Quality. There is no public water service in the vicinity of subject property, however, all of the existing residential properties in the surrounding area are provided domestic water services by individual onsite wells or springs and there is no evidence of groundwater depletion as a result. Applicant intends to develop an onsite water source for future development of the property. Fire protection in the area is provided by Bandon Rural Fire District and police protection is provided by the Coos County Sheriff's Office.

The demand for other utilities and services, including electricity and communications, will be no greater than that resulting from the historic use of other adjoining and nearby properties. The proposed ACU will not adversely impact the present or future provision of public facilities and services in the surrounding area. This conclusion is based on consideration of the existing public service delivery systems and plans that are in effect within the surrounding area, and which are intended to ensure proper coordination of the types, locations and delivery of the public facilities and services necessary to support existing and proposed land uses in the area. The services that are available, or are proposed, to the subject property include those listed in the table below.

Table A
Public Facilities (Existing)

Public Facility	Provider
Water	Private Well
Sewer	Individual Septic System
Electric	Coos-Curry Electric CO-OP
Telephone	No public provider per Public Utility Commission
Solid Waste	Private
Police	Coos County Sheriff
Fire	Bandon Rural Fire District
Schools	School District No.
Road Access	Private Road

On the basis of the foregoing analysis, the subject property will be provided with an adequate level of public facilities and services, and such facilities and services will be delivered in a timely, orderly and efficient manner consistent with the purpose of Statewide Goal No. 11.

Goal No. 12 - Transportation

To provide and encourage a safe, convenient and economic transportation system.

The statewide transportation goal is intended to be applied on a countywide basis. Specific transportation-related policies and development standards are included within Coos County's Comprehensive Plan and land use ordinances to assure that the intent of the statewide transportation goal is implemented through the application of both state and local policies and standards at the time of development. The intent of Goal 12 is also implemented by the State Transportation Planning Rule (OAR 660, Division 12). OAR 660-12-060(1) requires that "*amendments to functional plans, acknowledged comprehensive plans, and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the identified function, capacity, and performance standards… of the facility*".

Four questions must be addressed to determine whether or not the proposed residential development will significantly affect a transportation facility as outlined in OAR 660-12-060(2):

A plan or land use regulation amendment significantly affects a transportation facility if it:

(a) Changes the functional classification of an existing or planned transportation facility;

(b) Changes standards implementing a functional classification system;
(c) Allows types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of a transportation facility; or
(d) Would reduce the performance standards of the facility below the minimum acceptable level identified in the TSP.

In order to ensure that a proposed land use change complies with the requirements of the Transportation Planning Rule, Coos County has adopted the following standard for intensified quasi-judicial applications (the applicant is not required to address but would like to be comprehensive):

(2) The applicant shall certify the proposed land use designations, densities or design standards are consistent with the function, capacity and performance standards for roads identified in the County Transportation System Plan.

(a) The applicant shall cite the identified Comprehensive Plan function, capacity and performance standard of the road used for direct access and provide findings that the proposed amendment will be consistent with the County Transportation System Plan.

Access to the subject property is directly from a private road that directly proceeds off State Highway 101. The functional classifications of transportation facilities within Coos County are identified in Table 3-3 of the Transportation Element of the CCZLDO. State Highway 101 is classified as a "Arterial".

Estimates of the average number of daily vehicle trips generated by a specific land use can be obtained from a number of reliable sources; however, the most commonly referenced source for such data is Trip Generation, published by the Institute of Transportation Engineers (ITE). Average daily trip generation rates published in the ITE's Edition of Trip Generation are based primarily on field data obtained from direct observation of actual land use activities. Trip generation rates are reported as an average of the often wide-ranging vehicle counts taken at numerous sites having the same classification of land use. Trip generation rates are often broken down into 24-hour time frames, and reported as "Average Daily Trips (ADT)". For most land use activities, including single-family rural dwellings, ITE defines an "average daily trip" as a one-way vehicular movement between a single origin and a single destination. For a single recreational vehicle space, trip generation rates are reported as a ratio of 3.6 vehicle trips per day per dwelling unit. Based on the maximum potential development density proposed, 130 spaces total, the subject property can be expected to generate an additional 468 ADT.

New developments generating fewer than 300 ADTs are generally considered to have no significant impact on local transportation facilities that serve a development site. The property utilized a private road that is directly off State Highway 101. Current traffic volumes on State Highway 101 are well below the facility's design capacity. Other public roads in the area are also adequate to accommodate both existing and potential future traffic volumes likely to be generated as a consequence of the requested recreational vehicle park. Kelly Sandow, Registered Engineer in the State of Oregon indicated in her report that the transportation system will no be adversely affected due to the development. Any new residential lots created as a consequence of the proposed recreational vehicle will be accessed by a privately maintained interior road system that will intersect with State Highway 101 on the western property line. There will also be an emergency access connection at the south end of the subject property.

On the basis of the foregoing, the proposed development, when taking into consideration the densities or design standards prescribed for uses permitted in the requested Q-REC zone, is consistent with the function, capacity and performance standard establish by Chapter 7 of the

CCZLDO. Furthermore, the County's Transportation System Plan has received acknowledgement of compliance with the Statewide Transportation Goal and the Transportation Planning Rule (OAR Chapter 660, Division 12) by the Land Conservation and Development Commission, and therefore concludes that the facts set out above demonstrating compliance with the Transportation System Plan are sufficient to also demonstrate that the proposed amendment is consistent with both Goal 12 and the Transportation Planning Rule.

Goal No. 13 - Energy Conservation

To conserve energy.

The statewide energy conservation goal is intended to be applied on both a county-wide basis through the adoption of local energy conservation goals contained within the Comprehensive Plan, and on a site specific basis through the implementation of those Plan policies via property development standards intended to require land and uses developed on land to be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principals.

The subject property is located in an area dedicated primarily to non-resource uses and is approximately two miles south of the Bandon area boundary which is an established Goal 14 exception area. Consequently, existing and future development of this property has and will promote the efficient energy-related use of existing and planned public facilities and services. The site is in general proximity to an identified urban area and is free of any significant physical constraints that would otherwise require more energy to develop and use the property than would other property in the general area. Furthermore, specific energy conservation policies and development standards are included within the Coos County Comprehensive Plan, as well as in the County's land use ordinances, to ensure that the statewide energy conservation goal is implemented on a site-specific basis at the time of property development. The proposed ACU will not conflict with Statewide Goal No.13.

Goal No. 14 - Urbanization

To provide for an orderly and efficient transition from rural to urban land use.

Goal No. 14 requires local governments to establish urban growth boundaries that separate urban lands from rural lands. The proposed Administrative Conditional Use does not involve transition to another designation through a quasi-judicial plan amendment and zone change. The proposed

development will constitute creating a less intensified use than what the property has been previously utilized for (industrial) but will maximize the property in a recreational capacity. The proposed application is consistent and proposes no conflict with Goal 14.

IV. CREMP POLICIES AND GOAL COMPLIANCE

POLICY #3: Use of "Coquille River Estuary Special Considerations Map" as the Basis for Special Policies Implementation Local governments shall use the "Coquille River Estuary Special Considerations Map" as the basis for implementing the special protection.

I. The "Coquille River Estuary Special Considerations Map" shall delineate the general boundaries (plan inventory maps contain more precise boundary locations) of the following specific areas covered by the Coquille River Estuary Management Plan:

a. Coquille River 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. Dredged Material Disposal and Mitigation/Restoration Sites

h. Significant Wildlife Habitat and Major Marshes

i. Forest Lands The Special Considerations Map is NOT a substitute for the detailed spatial information presented on the CREMP's inventory maps.

The Special Considerations Map is merely an index guide designed as a zoning counter implementation tool that indicates when special policy considerations apply in a general area, thereby requiring inspection of the detailed plan inventory maps. The Special Considerations Map must and shall at all times accurately reflect the detail presented on the inventory maps (but at a more general scale).

II. Specific plan provisions set forth elsewhere as policy and relating to the above-listed considerations shall be used in conjunction with the Coquille River Estuary Special Considerations Map; such plan provisions include allowed uses and

activities in each management unit, and the following specific "functional" policies set forth below: III-520 Return to Top of Document

#13 Overall Use Priorities within Coastal Shorelands

#14 General Policy on Uses within Rural Coastal Shorelands

#15 Land Divisions within Rural Shorelands

#16 Protection of Sites Suited to Water-Dependent Uses; and Special Allowance for New Non-Water-Dependent Uses is "Urban Water-Dependent (UW)" Units which are "Suitable for Water-Dependent Uses"; and Potential Sites Suited to Water-Dependent Uses; and Protection of Sites Suited to Water-Dependent Uses in Future Urbanizable Areas

#16a Rural, Urban, and Unincorporated Communities Use Standards

#16b Potential Sites Suitable for Water-Dependent Uses

#16c Protection of Sites Suited to Water-Dependent Uses in Future Urbanizable Areas

#17 Protection of "Major Marshes" and "Significant Wildlife Habitats" in Coastal Shorelands

#18 Protection of Historical, Cultural and Archaeological Sites

#19 Management of "Wet-Meadow" Wetlands within Coastal Shorelands

#20 Dredged Material Disposal Sites

#21 Mitigation and Restoration Sites #22 Mitigation Sites: Protection against Pre-emptory Uses

#22a Acquisition and Protection of Mitigation/Restoration and Dredged Material Disposal Sites

#23 Riparian Vegetation/Streambank Protection #24 Waste Water/Storm Water Discharge

#27 Floodplain Protection within Coastal Shorelands

#28 Recognition of LCDC Goal #3 (Agricultural Lands) Requirements for Rural Lands within the Coastal Shorelands Boundary

#29 Restricting Actions in Beach and Dune Areas that are "Unsuitable for Development"

#30 Restricting Actions in Beach and Dune Areas with "Limited Development Suitability"; and Special Consideration for Sensitive Beach and Dune Resources III-521 Return to Top of Document

#31 (Reserved)

#34 Recognition of LCDC Goal #4 (Forest Lands) Requirements for Rural Lands within the Coastal Shorelands Boundary

All other plan provisions - including allowed uses and activities - are subordinate to the special "functional" policies listed above.

III. This policy recognizes that the Coquille River Estuary Special Considerations Map:

a. is an official policy component of this estuary management plan; and

b. provides a mechanism for site-specific application of special management policies.

FINDING: **The underlying intent of this particular policy is to protect the integrity of natural features, more specifically beaches and shorelines. The subject property borders the Coquille River to the north and has some stretches of CREMP protected areas. The pre-application materials indicate some of the development including the roads and parking area protrude into CREMP protected areas to the south. The applicant and property cannot substantiate this claim, as the conceptual plan and preliminary proposal illustrates no encroachment. Management plans or policies should not be necessary in conjunction with the proposal.**

POLICY #14: General Policy on Uses within Rural Coastal Shorelands

I. Coos County shall manage its rural areas with the "Coquille River Coastal Shorelands Boundary" by allowing only the following uses in rural shoreland areas, as prescribed in the management units of this Plan, except for areas where mandatory protection is prescribed by LCDC Goal #17 and #18:

a. farm uses as provided in ORS 215;

b. propagation and harvesting of forest products consistent with the Oregon Forest Practices Act;

c. private and public water-dependent recreation developments;

d. aquaculture; III-533 Return to Top of Document

e. water-dependent commercial and industrial uses, water-related uses and other uses only upon a finding by the county that such uses satisfy a need which can not be accommodated on uplands or in urban and urbanizable areas or in rural areas built upon or irrevocably committed to non-resource use;

f. single family residences on lots, parcels, or units of land existing on January 1, 1977 when it is established that:

1. the dwelling is in conjunction with a permitted farm or forest use, or

2. the dwelling is in a documented "committed" area, or

3. the dwelling has been justified through a goal exception, or

4. such uses do not conflict with the resource preservation and protection policies established elsewhere in this Plan;

g. any other uses, provided that the Board of Commissioners determines that such uses satisfy a need which cannot be accommodated at other upland locations or in urban or urbanizable areas. In addition, the above uses shall only be permitted upon a finding that such uses do not otherwise conflict with the resource preservation and protection policies established elsewhere in this Plan.

This strategy recognizes (1) that Coos County's rural shorelands are a valuable resource and accordingly merit special consideration, and (2) that LCDC Goal #17 places strict limitations on land divisions within coastal shorelands. This strategy further recognizes that rural uses "a" through "g" above, are allowed because of need and consistency findings documented in the "factual base" that supports this plan.

FINDING: The proposed development is consistent with Policy #14 as set forth in subsection g above. The application will be required to be placed before the body of the Planning Commission. The proposed development of a recreational vehicle park has been widely accepted as suitable in close proximity to river or nature features due to the type of amenity it provides. In addition, the conceptual plan clearly dictates no encroachment into the CREMP area as it pertains to structural development. However, is consistency is still required, it should be apparent that one future major amenity the proposal will include is a dock location, which creates water dependency.

POLICY #27: Floodplain Protection within Coastal Shorelands

The respective Flood Regulations of local governments set forth requirements for uses and activities in identified flood areas; these shall be recognized as implementing ordinances of this Plan. This strategy recognizes the risk of substantial loss of stock and property damage resulting from the widespread flooding of the Coquille River Valley floor which occurs during most winters.

FINDING: The subject property has been determined to be partially inundated in the Floodplain, as regulated by Coos County under the guidance of the National Flood Insurance Program (NFIP). The property owner has engaged and contracted with a private engineer qualified to perform an analysis necessary to dictate the development will not cause a rise in flood waters in the event of a 100-year flood event. This study has been attached and will be discussed further at a later point in the application materials.

V. UTILITY COMPLIANCE

I. Sanitation

The applicant/property owner are proposing a 130 space recreational vehicle park with amenities. The property has been thoroughly analyzed by Paul Kennedy, register soil scientist to determine how sanitation can be properly facilitated. The attached memo prepared by i.e. Engineering indicates the following in regards to the sanitation system " *Each unit will have a standard RV sewer hookup. The raw sewerage from the site will flow by gravity to one of the onsite septic and dose tanks. The septic tanks will be sized to serve up to 12 RV units each. The dose tanks contain pumps to force the effluent into the proposed onsite force main. The force main will connect all of the dose tanks to transfer the effluent to the approved treatment area that is located in the southeast corner of the site. After treatment, the treated effluent will be pumped into a bottomless sand filter."*

In addition, the attached utility plans outline the proposed septic and drainfield system proposed to meet the sanitation requirements. The southeast area of the property is proposed to be utilized for the septic tank and drainfield area after being tested (14 test pits as described above). Ground water studies, a sewer design report and construction details will be prepared for DEQ's WPCF permit.

The proposed sanitation system will serve the recreational vehicle parks proposed spaces and amenities and fully meet the requirements set forth by Coos County and the Department of Environmental Quality. The subject property was previously consolidated into one lot and therefore, the sanitation system only serves proposed development located on one lot of record. The applicant finds the proposed sanitation meets all the requirements of CCLZO and DEQ.

II. Water

In a similar regard to the sanitation system requirement for the proposed 130 space recreational vehicle park, domestic water use is a necessary and required amenity. The attached memo drafted by i.e. Engineering illustrates how domestic water will be facilitated to the site and the proposed development. Water will be supplied via two onsite wells that are located on the western and south central portions of the property (see attached utility plan). As stated in the memo "*The estimated water needs for the entire development, when at 100% capacity and completely full, is 15,000 gallons per day. At this peak capacity, pumping at the well yield of 39.5 gallons per minute, 15,000 gallons of water will require the well*

to be pumped 6 hours and 20 minutes per day. This would leave on average, over 17 hours a day for the well to recharge, on days when the RV Resort is at full capacity. On days when the resort is not a full capacity, the well would be pumped less and have more recharge time than the numbers listed above."

The existing and proposed wells have ample capacity to address domestic water usage needs for the proposed development. There will also be a water storage component to the plan and a tank is proposed to be installed to achieve storage needs. *"To help regulate the pumping of the well, water from the well will be pumped into a small storage reservoir that will be located at the top end of the RV Resort. This tank will be sized at approximately 15,000 gallons providing a full day of storage for the resort at full capacity. Water from the well will be treated and pumped up to the storage reservoir. From the storage reservoir, water will then be conveyed via separate a waterline to the RV Resort for direct use. The reservoir water tank will be elevated as needed to provide adequate water pressure for use."*

Water treatment requirements will also need to be addressed and the applicant/property owner is proposing to do so by installing an ultraviolet water treatment system to disinfect the water that is pumped from the well prior to being pumped into storage. This installation will be consistent with rural type developments and has been proven to be environmentally friendly. Plans will be constructed and submitted in regard to the proposed treatment process.

III. Access & Traffic

VI. OVERLAY COMPLIANCE

I. Wetlands

As previously discussed in Statewide Planning Goal 5 above, the property has some existing wetland activity as determined by the department of state lands. The northwestern portion of the property more particularly has freshwater emergent wetland activity. Laron Waldron, Biologist, and wetland delineator reviewed the property and the potential development. After a full delineation was completed, it was further determined there are no existing state or federal wetlands located in the area where the proposed development will be constructed. The analysis and report was completed in June of 2021 placing it well within the required five year time frame for reviewing potential encroachments. Please refer to the attached report from Mr. Waldon along with findings above the further address wetland natural features.

II. Floodplain Compliance

The subject property, according to the Coos County affective FIRM no. 41011C0494F has been determined to be located in an unnumbered or approximate A zone. These areas lack full data that would help differentiate between appropriate flood zones that would be clear in numbered A zones. There is no clear understanding where the floodway versus the floodplain is located and

how the property can be affected by inundation. The property owner utilized the services of West Consultants, INC (James Heyen, professional engineer) in order to perform a HEC-RAS analysis. The necessary technical memorandum is attached hereto and determines the area proposed for development is not located in and offers no encroachment within the regulatory floodplain.

The applicant/property owner finds the project is consistent with the requirements of the floodplain article of the CCZLO. In addition, the area proposed for development will not require any elevation due to also being located outside of the floodplain (see figure 4 in attached tech memo).

Section 4.11.235 Establishment of Development Permit

1. Floodplain Application Required

A floodplain application shall be submitted and approved before construction or regulated development begins within any area of special flood hazard established in Section 4.11.232. The permit shall be for all structures including manufactured homes, as set forth in the "DEFINITIONS," and for all development including fill and other activities, also as set forth in the "DEFINITIONS."

FINDING: The property owner/applicant consulted with an engineering firm to complete a HEC-RAS analysis which dictated that the proposed development along with amenities are not located in the floodplain or regulatory floodway.

2. Application

An application shall be made on the forms furnished by the Planning Department and may include, but not be limited to, plans in duplicate drawn to scale showing the nature, location, dimensions, and elevations of the area in question; existing or proposed structures, fill, storage of materials, drainage facilities, and the location of the foregoing. Specifically, the following information is required:

a. Elevation in relation to mean sea level, of the lowest floor (including basement) of all structures which may be submitted by a registered surveyor;

b. Elevation in relation to mean sea level of floodproofing in any structure;

c. Certification by a registered professional engineer or architect that the floodproofing methods for any nonresidential structure meet the floodproofing criteria in Section 4.11.252; and

d. Description of the extent to which a watercourse will be altered or relocated as a result of proposed development.

e. Plot plan drawn to scale showing the nature, location and dimensions and elevation referenced to mean sea level, or NAVD 88, whichever is applicable, of the area in question including existing and proposed structures, fill, storage of materials, and drainage facilities. Applicants shall submit certification by an

Oregon registered professional engineer or land surveyor of the site's ground elevation and whether or not the development is located in a flood hazard area. If so, the certification shall include which flood hazard area applies, the location of the floodway at the site, and the 100 year flood elevation at the site. A reference mark shall be set at the elevation of the 100 year flood at the site. The location, description, and elevation of the reference mark shall be included in the certification; and

f. Any other information required to show compliance.

g. Applications for variance, water course changes or staff determinations will be noticed with an opportunity to appeal in the same manner as a conditional use (see Chapter V). Non- discretionary determination of compliance with the standards will be processed in the same manner as a Compliance Determination (see Article 5.10)

FINDING: The property owner/applicant has attached an engineered conceptual plan with elevations along with a HEC-RAS analysis that determined there is no risk of inundation because the project and all nature of construction is not located within any identified floodplain area. Elevation requirements to prevent inundation should not be required.

SECTION 4.11.252 SPECIFIC STANDARDS

In all areas of special flood hazards where base flood elevation data has been provided (Zones A1-30, AH, and AE) as set forth in Section 4.11.232, BASIS FOR ESTABLISHING THE AREAS OF SPECIAL FLOOD HAZARD or Section 4.11.243(2), Use of Other Base Flood Data (In A and V Zones), the following provisions are required:

2. Nonresidential Construction

New construction and substantial improvement of any commercial, industrial or other nonresidential structure shall either have the lowest floor, including basement, elevated at or above the base flood elevation; or, together with attendant utility and sanitary facilities, shall:

a. Be floodproofed so that below the base flood level the structure is watertight with walls substantially impermeable to the passage of water;

b. Have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy;

c. Be certified by a registered professional engineer or architect that the design and methods of construction are in accordance with accepted standards of practice for meeting provisions of this subsection based on their development and/or review of the structural design, specifications and plans. Such certifications shall be provided to the official as set forth in Section 4.11.243(3)(b);

d. Nonresidential structures that are elevated, not floodproofed, must meet the same standards for space below the lowest floor as described in 4.11.252(1)(b);

e. Applicants floodproofing nonresidential buildings shall be notified that flood insurance premiums will be based on rates that are one foot below the floodproofed level (e.g. a building floodproofed to the base flood level will be rated as one foot below);

f. Applicants shall supply a comprehensive Maintenance Plan for the entire structure to include but not limited to: exterior envelope of structure; all penetrations to the exterior of the structure; all shields, gates, barriers, or components designed to provide floodproofing protection to the structure; all seals or gaskets for shields, gates, barriers, or components; and, the location of all shields, gates, barriers, and components as well as all associated hardware, and any materials or specialized tools necessary to seal the structure; and

g. Applicants shall supply an Emergency Action Plan (EAP) for the installation and sealing of the structure prior to a flooding event that clearly identifies what triggers the EAP and who is responsible for enacting the EAP.

FINDING: The applicant/property owner has gone through great lengths to ensure no area of the project protrudes into the floodplain or regulatory floodway. If the county finds that some elevation or wet floodproofing measures are required, the property owner will consider how to install them per building code specifications. However, HEC-RAS and elevation data dictate the project area, including all construction place the construction outside of such area.

4. Recreational Vehicles

Recreational vehicles placed on sites are required to:

a. Be on the site for fewer than 180 consecutive days; and

b. Be fully licensed and ready for highway use, on its wheels or jacking system, is attached to the site only by quick disconnect type utilities and security devices, and has no permanently attached additions; or

c. Meet the requirements of Section 4.11.252(3) above and the elevation and anchoring requirements for manufactured homes.

FINDING: As previously mentioned, elevation and HEC-RAS data place the project out of the floodplain, including all recreational vehicles spaces. However, spaces are not anticipated to be occupied for longer than seven days which would allow the park, by default to keep this 180 day requirement. In addition, remaining road ready with quick disconnect will be a requirement of the park and will be carried out.

III. Archaeological Activity

The State Historic Preservation Office regulates properties and structures where historic or archeological type activity may be prevalent. It is important to take stock of any items or resources that may be in need of protection because they hold some historic or archaeological value. Mark Tveskov (Black Dog Archaeology, LLC) was tasked with evaluated the site and providing a cultural resource inventory. A site visit and evaluation was conducted on February 13, 2023 in conjunction with the anticipation of the recreational vehicle park buildout. The attached report dictates "*Finally, significant archaeological resources are known or reported to be located within the vicinity of the property and the Coquille Indian Tribe regards the area as sensitive for cultural resources. There is always a potential that cultural resources could be encountered when a property is developed and ground disturbance occurs. Archaeological sites and objects—even those that have not been previously identified—are protected under Oregon law on both state and private lands (e.g., ORS 97.740-760). In the event that archaeological objects, features, or a site be encountered, all work within the immediate area should be stopped and appropriate Indian Tribe, the Oregon State Historic Preservation Office, or a professional archaeologist should be contacted."*

The applicant/property owner understand and concede this area may have some historical archaeological activity. During the development process if any items in this regards are identified, all development activities will be stopped while fully cooperation with the State Historic Preservation office is achieved.

VII. CONCLUSION

The applicant/property owner asserts the proposed development is consistent with the criteria located in the CCLZO by virtue of the following findings:

FINDING: A recreational vehicle park development is identified as a conditionally permitted use in the Q-REC zoning to which the property is designated. Due to previous industrial uses of the subject property and the lack of any farm or forest operations taking place around the subject property, the development can be considered to be compatible.

FINDING: The proposed development will include 130 recreational vehicle spaces that will occupy each space a maximum of 30 days or less. In addition, other buildings proposed in conjunction to the development (bathroom units, dog parks, club house and sports courts) are considered amenities

and act as incidental to the main proposed use because they are structures that you would typically find in recreational vehicle parks.

FINDING: The proposed development will cause no detriment or encroachment on river or riparian vegetative features, regulatory floodway areas, regulated state or federal wetlands or special coastal protected areas.

FINDING: The proposed development does not require taking an exception to Goal 14 for urbanization because all recreational vehicle spaces are temporary (30 days or less) and the utilities will only service one lot or parcel which is in keeping with the requirements surrounding development on rural land.

FINDING: The applicant has submitted a conceptual plan, drafted by a licensed engineer that illustrates the organization of the park will allow for development to achieve minimum impacts with the surrounding areas.

FINDING: The applicant/property has received approval from the Department of Environmental Quality for the type of sanitation system and drainfield that will serve the proposed development. A report has been submitted from Bandon Wells that provides ample proof the existing wells located on the property can serve the proposed use.

FINDING: Access to the property is sufficient to service the proposed recreational vehicle park and the proposed use is not anticipated to have any detrimental impact on the transportation system in the area. In addition, the proposed use has been determined to produce less traffic than the previous industrial type of use that occupied the property.

FINDING: The proposed recreational vehicle park offers an important amenity to the area given the proximity of the urban growth boundary of Bandon and Highway 101 adjacent to the property located westerly. Transient type parks allow travelers conveniences that are imperative to purpose of statewide planning goal 8.

FINDING: The proposed application for a recreational vehicle park through a conditional use should be approved by Coos County Planning Commission due to its consistency with the CCLZO and other state/local provisions.

TECHNICAL MEMORANDUM

WEST Consultants, Inc.
2601 25th St. SE
Suite 450
Salem, OR 97302-1286
(503) 485-5490
(503) 485-5491 Fax
www.westconsultants.com

Name: Mr. Ying Deng
Company: OutdoorSuperStar, LLC
Date: August 1, 2023
From: James Heyen, PE
Subject: Flood Risk Assessment and Floodway Analysis for the Lower Coquille River

---

Introduction

WEST Consultants, Inc. (WEST) has completed a flood risk assessment and floodway analysis of the lower Coquille River near Bandon, Oregon. The analysis was requested by Mr. Ying Deng in support of his ongoing permitting applications with Coos County for the proposed development of an RV park along the Oregon Coast Highway immediately adjacent to the left bank of the Coquille River. As the property in question lies within a FEMA 100-year Approximate Zone A floodplain, Coos County regulations require a detailed hydraulic analysis to establish the base flood elevation (BFE) for the 1% annual chance (100-year) flood event and determine the extents of a regulatory floodway. The results of the analysis will be used to ensure that the proposed development will be located outside of the floodway.

The proposed project lies within the floodplain of the Coquille River according to FEMA effective flood insurance rate map (FIRM) for Coos County number 41011C0494F, effective 12/07/2018. Figure 1 shows a map of the study area with an overlay of the effective FEMA flood hazard mapping and identifies the approximate location of the proposed development. All figures are presented Appendix A at the end of this memorandum. Unless otherwise specified, all elevations listed herein are referenced to the North American Vertical Datum of 1988 (NAVD88).

Hydraulic Modeling

The detailed hydraulic analysis was conducted using the River Analysis Software developed by the US Army Corps of Engineers Hydrologic Engineering Center (HEC-RAS), version 6.4.1. Because the project is located in a portion of the Coquille River only analyzed by approximate methods, the analysis developed a new hydraulic model of the study reach. The following sections describe the development of the detailed model and document the data sources.

Bathymetric and Topographic Data

Detailed bathymetry data for the lower Coquille River were obtained from a previous study conducted in 2010 for the Oregon Department of Transportation (ODOT). For that study, which developed hydraulic models to evaluate potential bridge scour at tidally influenced bridges, WH Pacific surveyed main channel cross sections in the vicinity of the Coquille River Bridge carrying US Route 101. Those data were collected in the Spring of 2010.

Topographic data, which covered all but the low flow channel of the river, were obtained from the "Southcoast" LiDAR dataset collected by the Oregon Department of Geology and Mineral Industries (DOGAMI) between April of 2008 and July of 2009.

The two data sources were mosaiced together to create a Terrain DEM of the river and overbanks for the project area. Figure 2 shows a map of the study area with the composite terrain consisting of topographic and bathymetric data.

Hydraulic Model Geometry

A total of fourteen cross sections were extracted from the terrain DEM to build the hydraulic model geometry and are shown in Figure 3. The river thalweg was used to create the model centerline upon which cross section river stationing and main channel downstream reach lengths were based. Left and right overbank flow paths were estimated from the terrain DEM and used to establish overbank downstream reach lengths.

Bridge data for the Coquille River Bridge carrying US Route 101 were imported from the 2010 ODOT study and confirmed by comparing them with as-built plans. The bridge is supported by eight piers and has sloping abutments at both ends.

Manning's roughness values were estimated from values listed in the effective FEMA Flood Insurance Study (FIS) for Coos County, which lists ranges of values employed by flooding source. While the downstream end of the Coquille River was not studied by detailed methods, the portion of the river studied by detailed methods begins near the community of Riverton, approximately 12 miles upstream from the Coquille River Bridge. The FIS lists Manning's roughness values for the Coquille detailed analysis of 0.03 in the main channel and between 0.03 and 0.08 in the overbanks. A main channel Manning's roughness value of 0.028 and overbank values ranging between 0.036 and 0.1 were applied based on examination of aerial photography and comparison with similar Southern Oregon coastal rivers.

Hydrology and Boundary Conditions

Discharge for the 1% annual chance flood on the Coquille River, 122,000 cfs at the confluence with the Pacific Ocean, was obtained from the effective FIS.

The downstream boundary condition for the lower Coquille River is highly influenced by tidal action. FEMA guidelines specify that when the downstream boundary of a model is within a coastal tidal reach, the tidal boundary of the model is taken as equal to the Mean Higher High Water (MHHW) level of the nearest tidal station. NOAA station 9432373 (Bandon, Coquille River OR) is the nearest tidal station, and records

indicate a MHHW elevation of 6.99 feet NAVD88. This value was used as the downstream boundary condition for the HEC-RAS model plan "without floodway" conditions.

Floodway Encroachment Analysis

A plan was created to model the "with floodway" conditions. The discharge for the 1% annual chance flood was retained – 122,000 cfs. FEMA guidelines specify that the downstream boundary condition for the "with floodway" condition be set to normal depth with the same energy grade slope as the "without floodway" condition. That slope was determined to be 0.001 and was set for the "with floodway" condition.

Encroachment stations were iteratively varied through the study reach until a floodway with a maximum surcharge of less than 1.0 feet was established while not encroaching within the bank stations and while retaining reasonable top width transitions between cross sections. The floodway analysis also considered the reasonableness of the computed floodway once transferred to a map. For this reach, it was found that encroachments up to the bank stations resulted in surcharges of less than one foot at all cross sections.

Analysis Results

The hydraulic analysis determined the water surface elevations for regulatory, without floodway, and with floodway conditions for a 1% annual-chance event along the lower Coquille River. Table 1 on the following page shows the detailed hydraulic modeling results.

The proposed project location is within the portion of the lower Coquille River influenced by backwater from coastal flooding. The effective FIS summary of elevations lists a BFE of 15.2', but the effective FIRM shows a BFE of 16.0'. We recommend the proposed development consider the BFE to be the more conservative value of 16.0'.

Figure 4 shows a map of the computed floodway along the lower Coquille, with a close-up view of the proposed development site. Inundation extents, shown in blue, in Figure 4 are for a static 16.0' BFE.

Table 1 – Hydraulic Analysis Results

	Floodway			1% Annual-Chance Flood Water Surface Elevation			
River Station	Width	Area	Mean Vel.	Regulatory	w/o Floodway	w/ Floodway	Increase
(ft)	(ft)	(sq-ft)	(ft/sec)	(ft)	(ft)	(ft)	(ft)
1,200	1,141	13,875	8.79	16.0	6.99	7.23	0.24
2,400	1,212	16,775	7.27	16.0	8.19	8.54	0.35
3,600	1,233	17,765	6.87	16.0	8.81	9.27	0.46
4,800	1,328	18,886	6.46	16.0	9.29	9.92	0.63
6,000	1,170	17,514	6.97	16.0	9.70	10.39	0.69
7,200	1,011	16,844	7.24	16.0	10.11	10.9	0.79
8,400	943	16,280	7.49	16.0	10.61	11.4	0.79
9,600	990	16,900	7.22	16.0	11.17	12	0.83
10,525	708	14,989	8.14	16.0	11.48	12.28	0.8
10,721	663	15,156	8.05	16.0	11.81	12.57	0.76
11,007	706	14,941	8.17	16.0	11.96	12.67	0.71
12,000	678	14,536	8.39	16.0	12.60	13.05	0.45
13,200	662	13,759	8.87	16.0	13.22	13.52	0.3
14,400	617	14,244	8.56	16.0	13.66	14.16	0.5

If you have any questions regarding the analysis results or methodology, please feel free to contact me at (503) 485-5490 or jheyen@westconsultants.com.

Appendix A
Figures

Figure 1 - Study Area with Overlay of Effective Flood Hazard Mapping

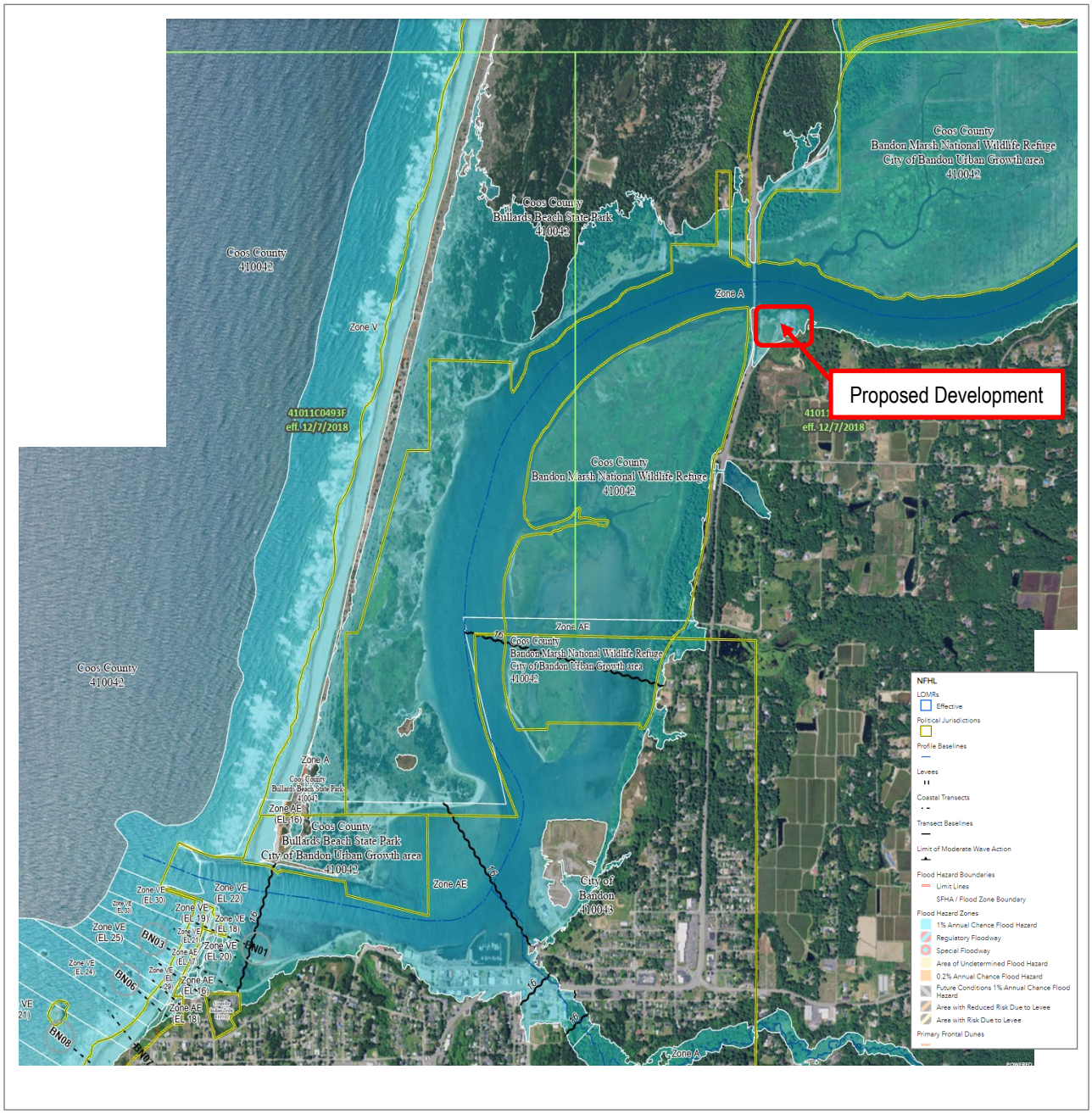


Figure 2 – Composite Terrain of Topography and Bathymetry

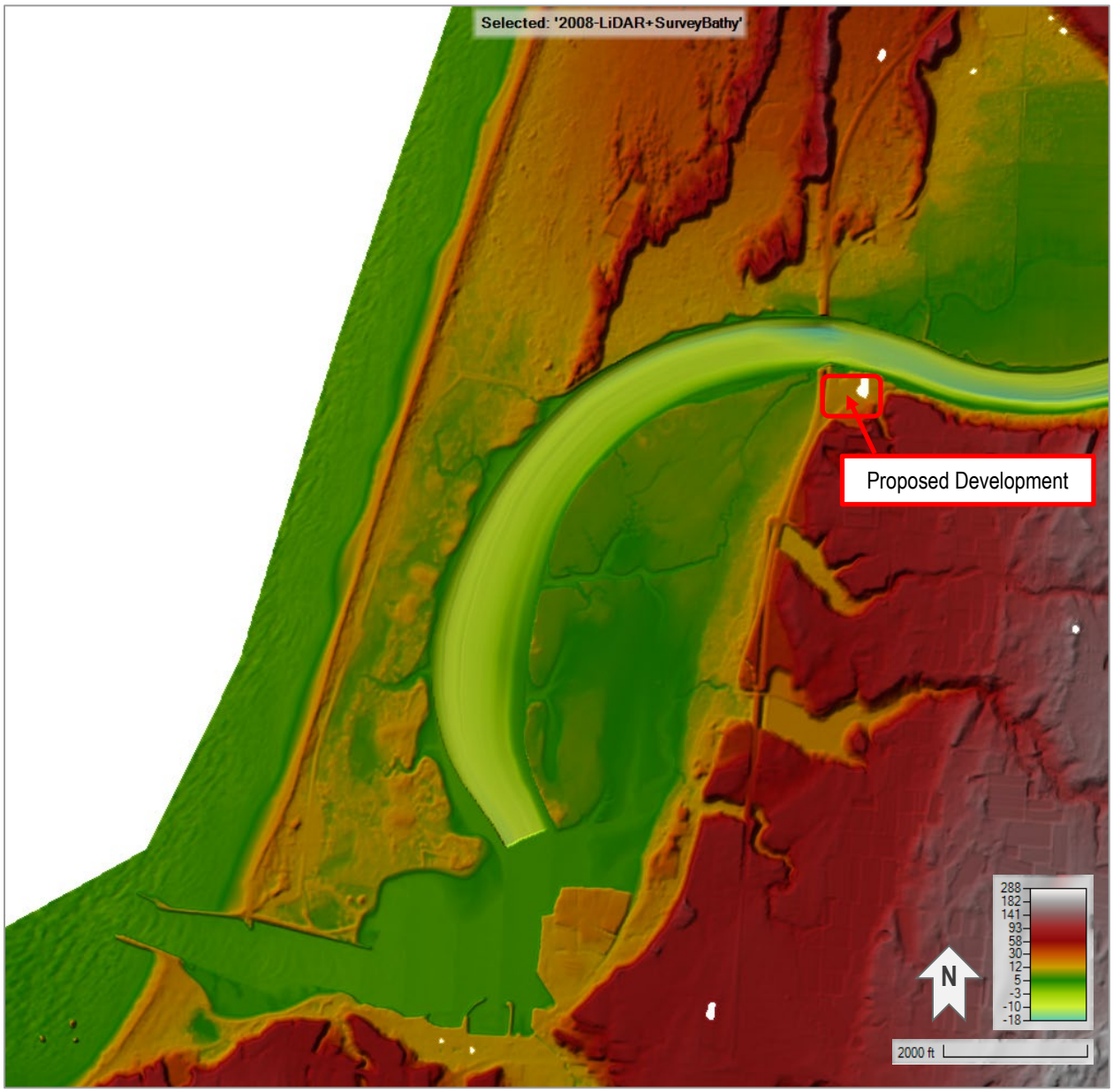


Figure 3 - Hydraulic Model Cross Sections

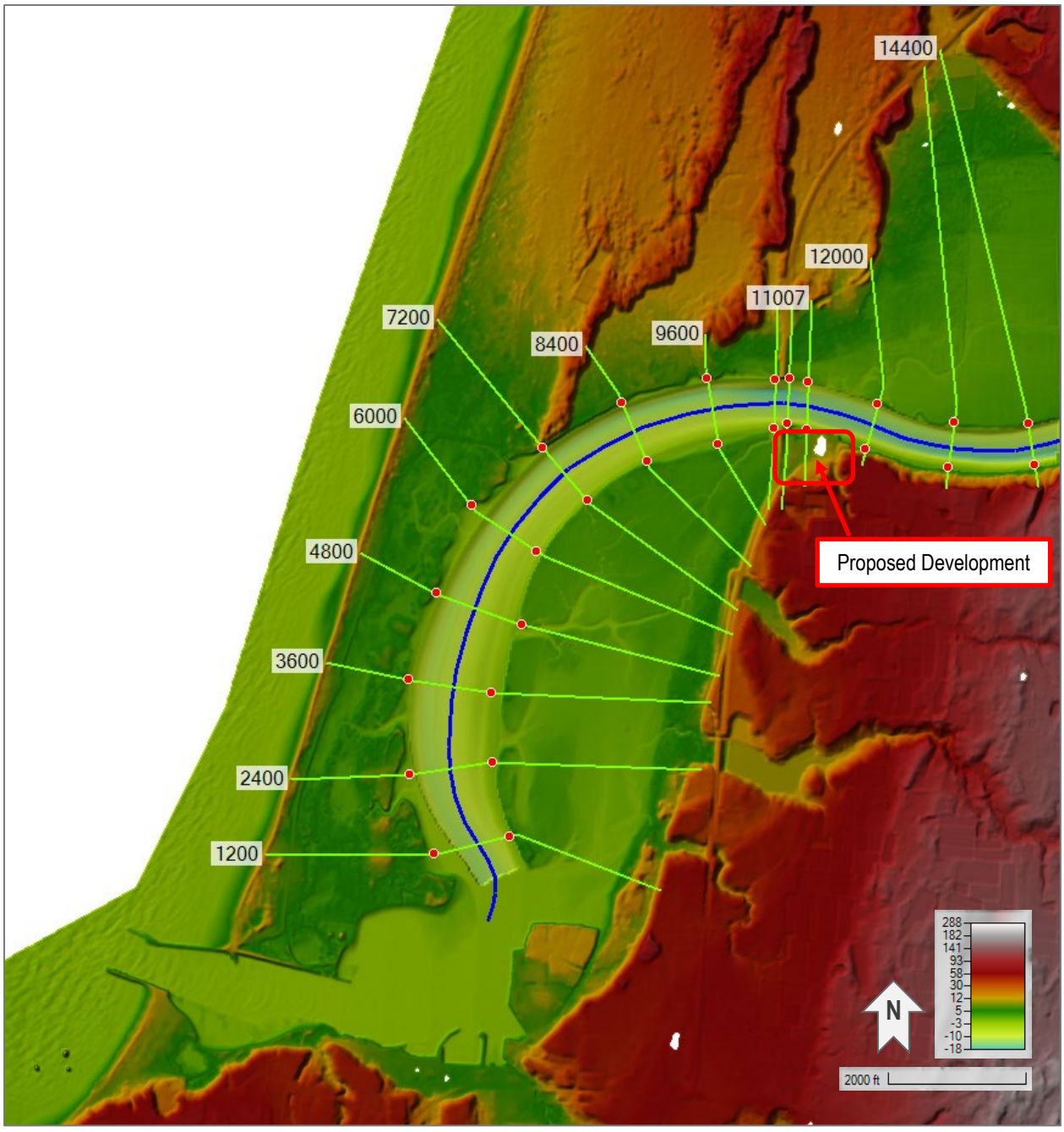
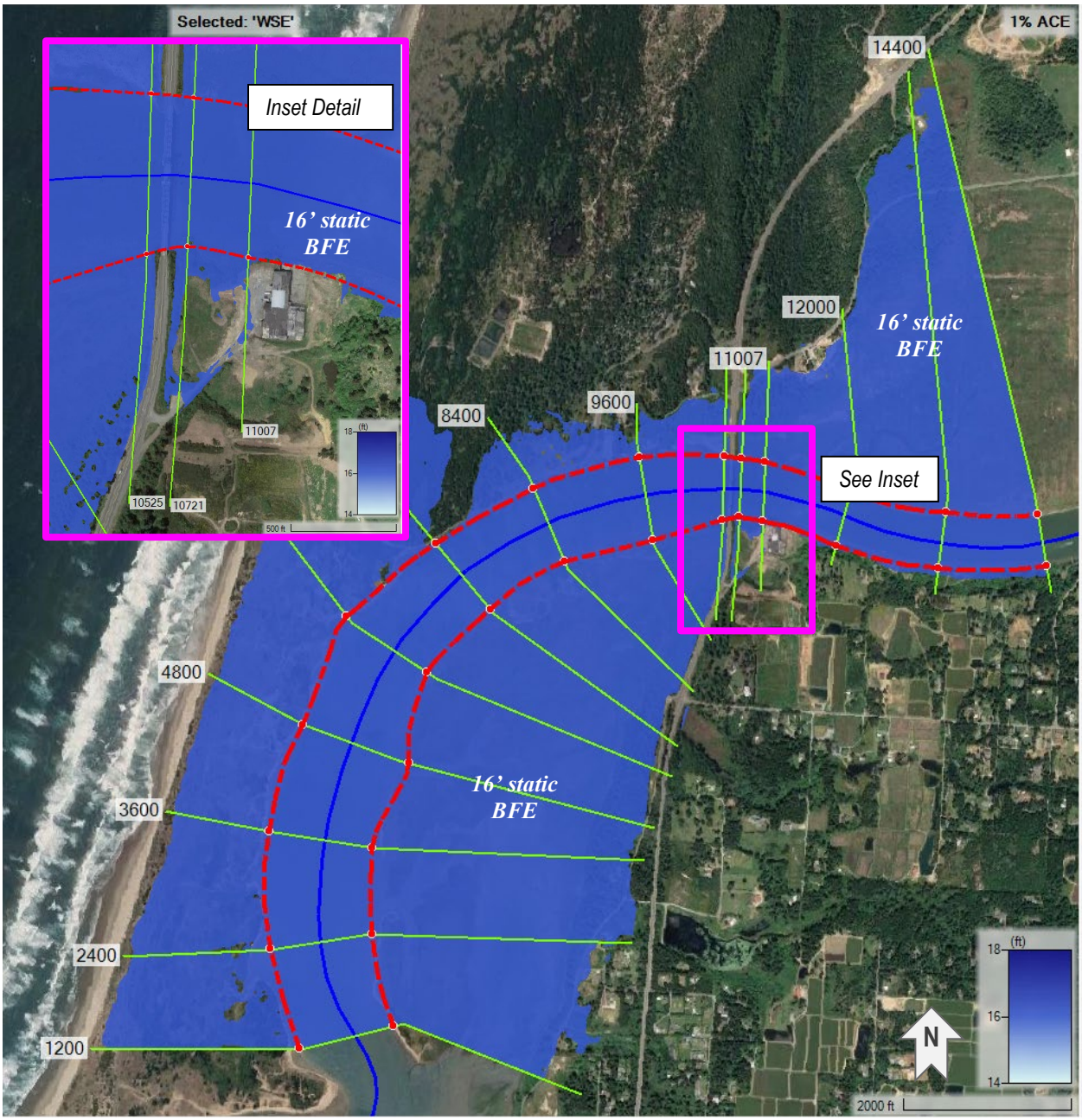
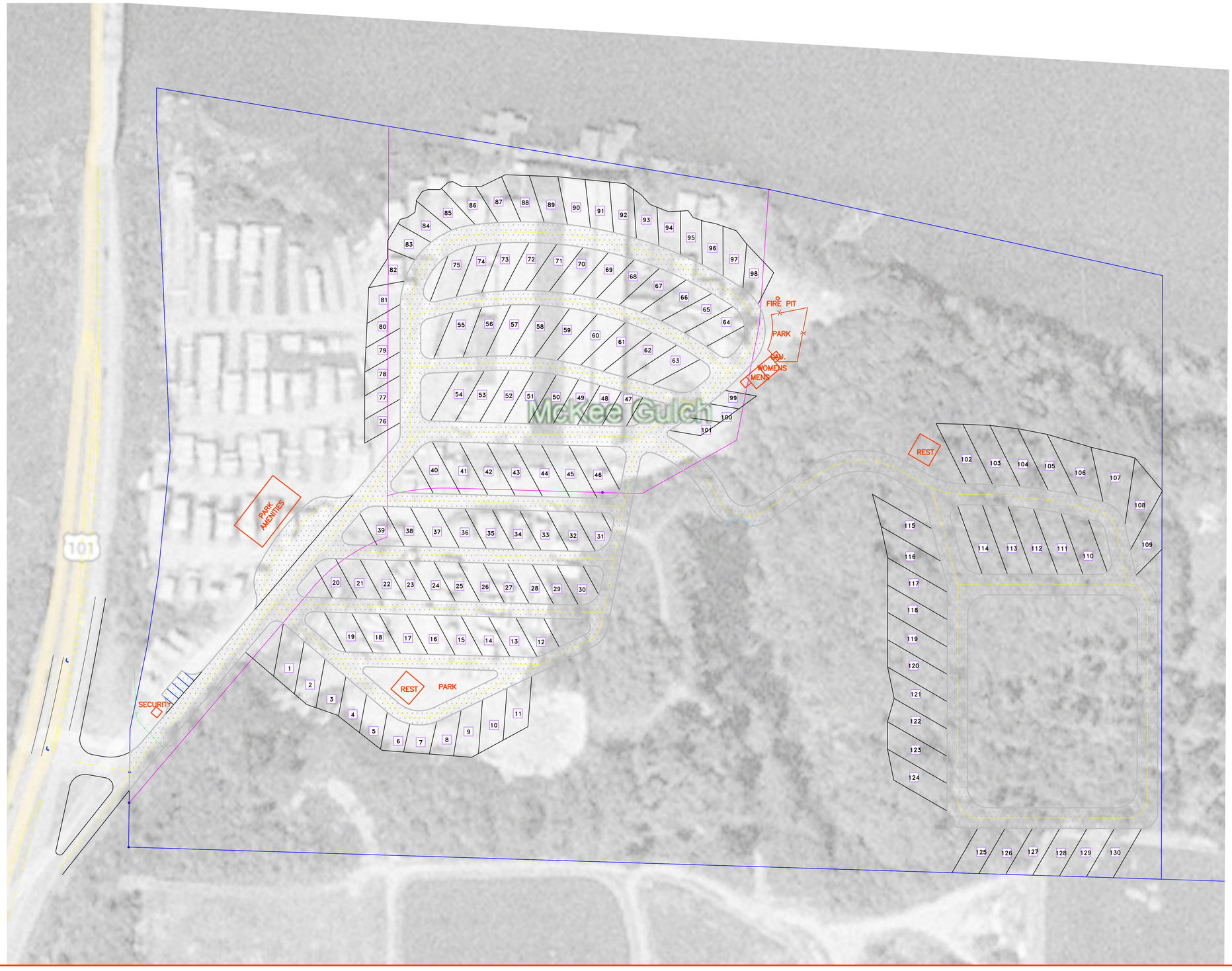


Figure 4 – Floodway Limits and Approximate Base Flood Inundation Extents



ROGGE MILL RV PRELIMINARY SITE PLAN 9-29-2023



TOTAL SPACES: 130 #
61 BACK IN SPACES
69 PULL THRU SPACES

LOWER AREA:
37 BACK IN SPACES
64 PULL-THRU SPACES

UPPER AREA:
24 BACK IN SPACES
5 PULL-THRU SPACES

*AERIAL EST. 1994

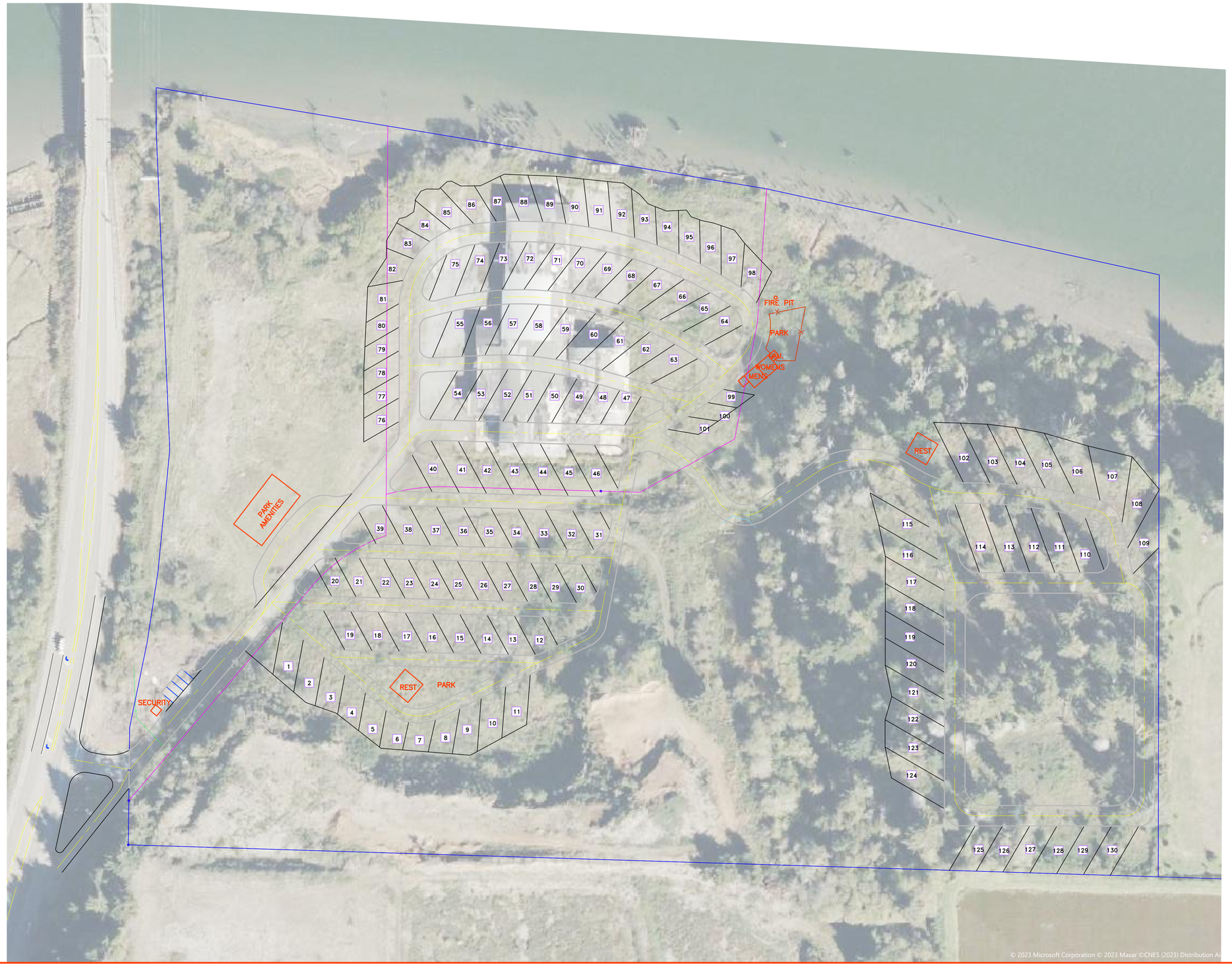
0' 30' 60 120'
SCALE: 1" = 60'

809 SE Pine Street
Roseburg, Oregon 97470
PHONE (541) 673-0166
FAX (541) 440-9392
iemail@ieengineering.com

PROJECT NO. 3142-01
DWG BY: AW

AndrewW Sep 29, 2023 Z:\JOBS\3142-Outdoorsuperstor, LLC\3142-01 Rogge Mill RV Resort\DESIGN\XREF\3142-01_DESIGN.dwg

ROGGE MILL RV PRELIMINARY SITE PLAN 9-29-2023



TOTAL SPACES: 130 #
61 BACK IN SPACES
69 PULL THRU SPACES

LOWER AREA:
37 BACK IN SPACES
64 PULL-THRU SPACES

UPPER AREA:
24 BACK IN SPACES
5 PULL-THRU SPACES

*AERIAL EST. 2015

0' 30' 60 120'
SCALE: 1" = 60'

809 SE Pine Street
Roseburg, Oregon 97470
PHONE (541) 673-0166
FAX (541) 440-9392
iemail@ieengineering.com

PROJECT NO. 3142-01
DWG BY: AW

AndrewW Sep 29, 2023 Z:\JOBS\3142-Outdoorsupenter, LLC\3142-01 Rogge Mill RV Resort\DESIGN\XREF\3142-01_DESIGN.dwg

ROGGE MILL RV PRELIMINARY SITE PLAN 9-29-2023

TOTAL SPACES: 130 #
61 BACK IN SPACES
69 PULL THRU SPACES

LOWER AREA:
37 BACK IN SPACES
64 PULL-THRU SPACES

UPPER AREA:
24 BACK IN SPACES
5 PULL-THRU SPACES

*AERIAL EST. 2023

N

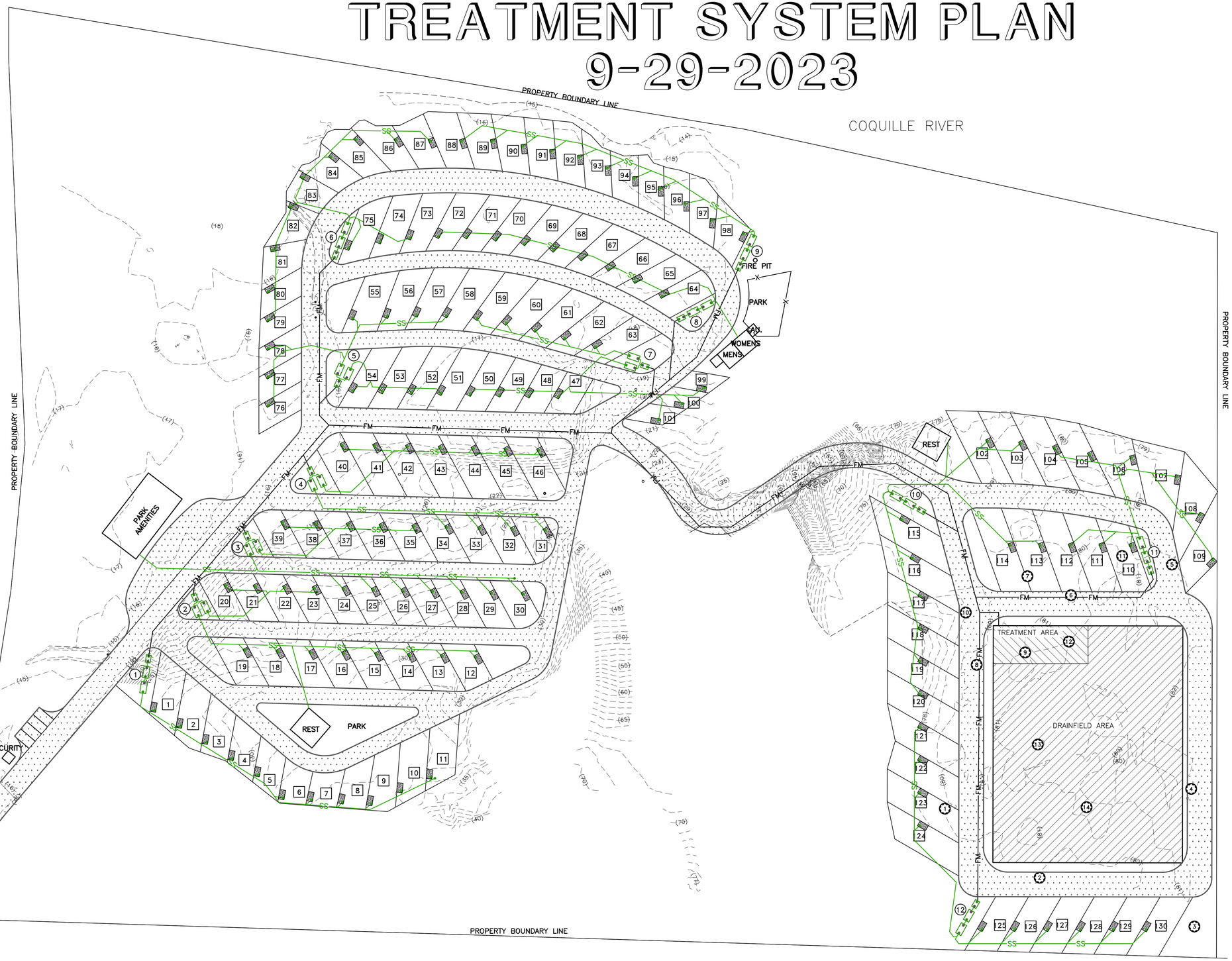
0' 30' 60 120'
SCALE: 1" = 60'

809 SE Pine Street
Roseburg, Oregon 97470
PHONE (541) 673-0166
FAX (541) 440-9392
iemail@ieengineering.com

PROJECT NO. 3142-01
DWG BY: AW

AndrewW Sep 29, 2023 Z:\JOBS\3142-Outdoorsupersto, LLC\3142-01 Rogge Mill RV Resort\DESIGN\PREP\3142-01_DESIGN.dwg

ROGGE MILL RV PRELIMINARY WASTEWATER TREATMENT SYSTEM PLAN
9-29-2023



LEGEND:

- SS — SANITARY SEWER LINE
- FM — FORCE MAIN SEWER LINE
- CONCRETE PAD WITH RV UTILITY HOOKUPS
- ASPHALT
- TREATMENT AREA
- DRAINFIELD AREA
- # SEPTIC & DOSE TANKS (1–12)
- # TEST PIT(1–14)

N

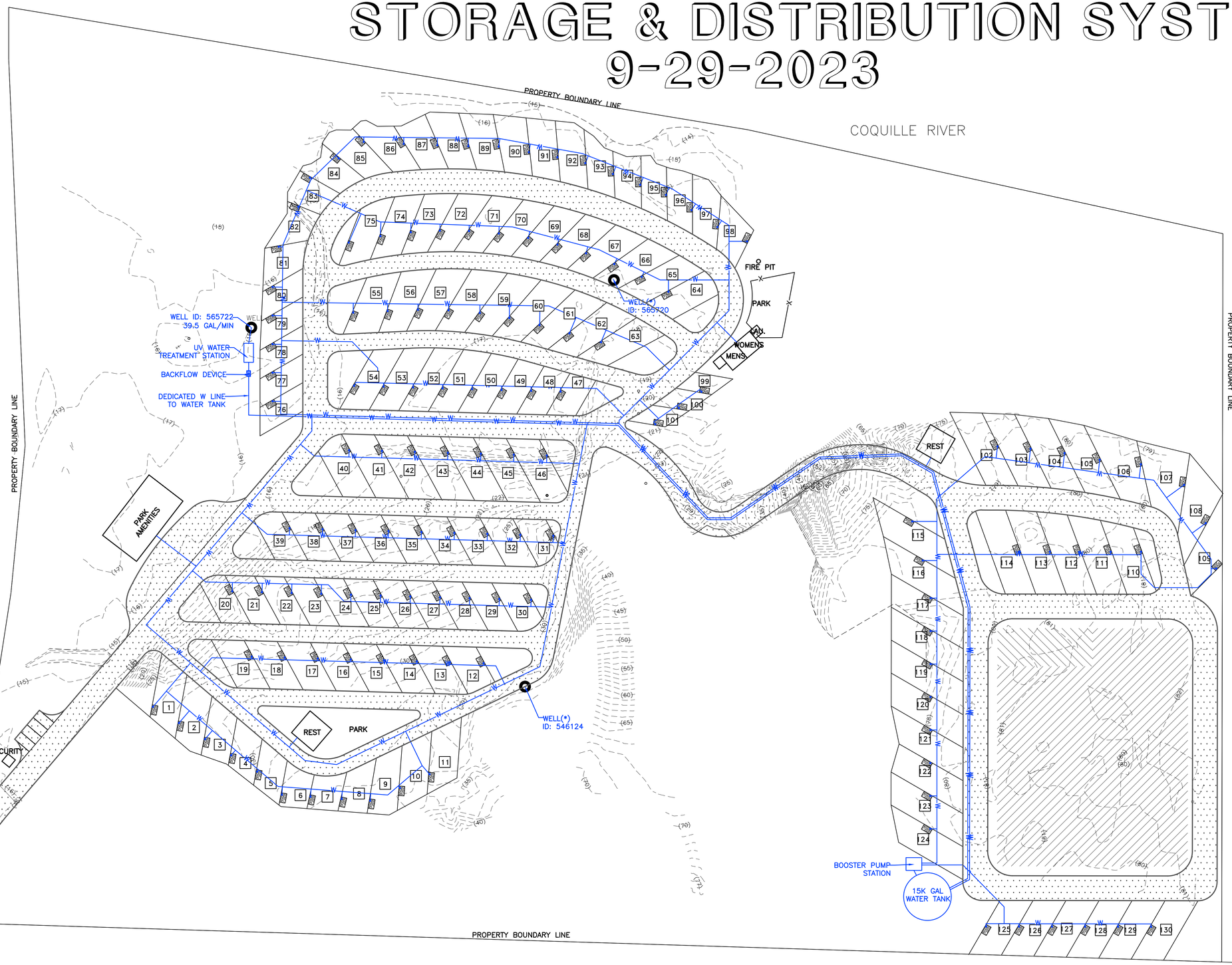
0' 25' 50' 100'
SCALE: 1" = 50'

809 SE Pine Street
Roseburg, Oregon 97470
PHONE (541) 673-0166
FAX (541) 440-9392
iemail@ieengineering.com

PROJECT NO. 3142-01
DWG BY: AW

AndrewW Sep 29, 2023 Z:\JOBS\3142-Outdoorsuperstor, LLC\3142-01 Rogge Mill RV Resort\DESIGN\XREF\3142-01_DESIGN.dwg

ROGGE MILL RV PRELIMINARY WATER TREATMENT STORAGE & DISTRIBUTION SYSTEM 9-29-2023



WATER SYSTEM:

- UV WATER TREATMENT FROM WELL
- RV WATER HOOKUPS(130)
- 15K GAL WATER TANK AND BOOSTER PUMP STATION FOR UPPER LEVEL

LEGEND:

- BACKFLOW DEVICE
- W — WATER LINE
- CONCRETE PAD WITH RV UTILITY HOOKUPS
- * WELL EITHER HAS BEEN OR WILL BE ABANDONED PRIOR TO DEVELOPMENT
- ASPHALT

N

0' 25' 50' 100'
SCALE: 1" = 50'

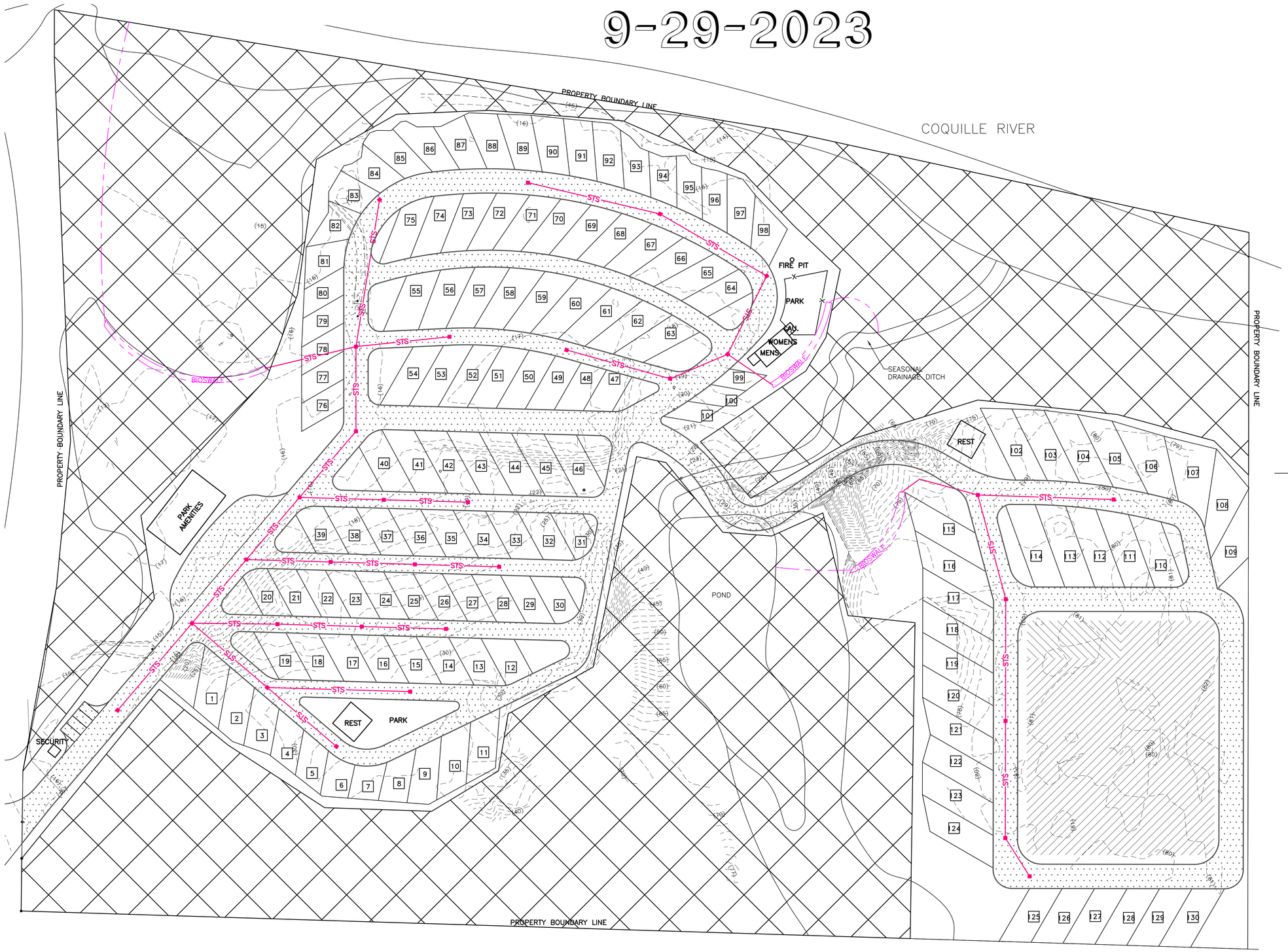
809 SE Pine Street
Roseburg, Oregon 97470
PHONE (541) 673-0166
FAX (541) 440-9392
iemail@ieengineering.com

PROJECT NO. 3142-01
DWG BY: AW

AndrewW Sep 29, 2023 Z:\DWGS\3142-Outdoorsopenstor, LLC\3142-01 Rogge Mill RV Resort\DESIGN\XREF\3142-01_DESIGN.dwg

ROGGE MILL RV PRELIMINARY DRAINAGE PLAN

9-29-2023



LEGEND:

- CATCH BASIN
- STS — STORM DRAIN LINE PIPE SIZE 6"–12"
- UNDISTURBED AREA OF SITE THAT WILL REMAIN NATURAL AND VEGETATED
- ASPHALT
- PROPOSED DRAINAGE DITCH

N

0' 25' 50' 100'

SCALE: 1" = 50'

809 SE Pine Street
Roseburg, Oregon 97470
PHONE (541) 673-0166
FAX (541) 440-9392
iemail@ieengineering.com

PROJECT NO. 3142-01
DWG BY: AW

Z:\JOBS\3142-Outdoorsuperstor, LLC\3142-01 Rogge Mill RV Resort\DESIGN\XREF\3142-01_DESIGN.dwg
AndrewW Sep 29, 2023

Form Instructions

U.S. DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency
National Flood Insurance Program

OMB Control No. 1660-0008
Expiration Date: 06/30/2026

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Copy all pages of this Elevation Certificate and all attachments for (1) community official, (2) insurance agent/company, and (3) building owner.

SECTION A – PROPERTY INFORMATION

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

A1. Building Owner's Name: *Outdoorsuperstar, LLC*

A2. Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

A3. Property Description (e.g., Lot and Block Numbers or Legal Description) and/or Tax Parcel Number:
Tax Lot 1000, T28S R14W, Section 17, Coos County, Tax Account #9555501

A4. Building Use (e.g., Residential, Non-Residential, Addition, Accessory, etc.): *Non-Residential*

A5. Latitude/Longitude: Lat. *43°08'43.59"* Long. *-124°23'36.32"* Horiz. Datum: ☐ NAD 1927 ☑ NAD 1983 ☐ WGS 84

A6. Attach at least two and when possible four clear color photographs (one for each side) of the building (see Form pages 7 and 8).

A7. Building Diagram Number:

A8. For a building with a crawlspace or enclosure(s):

a) Square footage of crawlspace or enclosure(s): *NA* sq. ft.

b) Is there at least one permanent flood opening on two different sides of each enclosed area? ☐ Yes ☐ No ☑ N/A

c) Enter number of permanent flood openings in the crawlspace or enclosure(s) within 1.0 foot above adjacent grade:
Non-engineered flood openings: *NA* Engineered flood openings: *NA*

d) Total net open area of non-engineered flood openings in A8.c: *NA* sq. in.

e) Total rated area of engineered flood openings in A8.c (attach documentation – see Instructions): *NA* sq. ft.

f) Sum of A8.d and A8.e rated area (if applicable – see Instructions): *NA* sq. ft.

A9. For a building with an attached garage:

a) Square footage of attached garage: *NA* sq. ft.

b) Is there at least one permanent flood opening on two different sides of the attached garage? ☐ Yes ☐ No ☑ N/A

c) Enter number of permanent flood openings in the attached garage within 1.0 foot above adjacent grade:
Non-engineered flood openings: *NA* Engineered flood openings: *NA*

d) Total net open area of non-engineered flood openings in A9.c: *NA* sq. in.

e) Total rated area of engineered flood openings in A9.c (attach documentation – see Instructions): *NA* sq. ft.

f) Sum of A9.d and A9.e rated area (if applicable – see Instructions): *NA* sq. ft.

SECTION B – FLOOD INSURANCE RATE MAP (FIRM) INFORMATION

B1.a. NFIP Community Name: *Coos County* B1.b. NFIP Community Identification Number: *410042*

B2. County Name: *Coos* B3. State: *OR* B4. Map/Panel No.: *41011C0494* B5. Suffix: *F*

B6. FIRM Index Date: *12/07/2018* B7. FIRM Panel Effective/Revised Date: *12/07/2018*

B8. Flood Zone(s): *A* B9. Base Flood Elevation(s) (BFE) (Zone AO, use Base Flood Depth): *16.0*

B10. Indicate the source of the BFE data or Base Flood Depth entered in Item B9:
☐ FIS ☐ FIRM ☐ Community Determined ☑ Other:

B11. Indicate elevation datum used for BFE in Item B9: ☐ NGVD 1929 ☑ NAVD 1988 ☐ Other/Source:

B12. Is the building located in a Coastal Barrier Resources System (CBRS) area or Otherwise Protected Area (OPA)? ☐ Yes ☑ No
Designation Date: ☐ CBRS ☐ OPA

B13. Is the building located seaward of the Limit of Moderate Wave Action (LiMWA)? ☐ Yes ☑ No

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

SECTION C – BUILDING ELEVATION INFORMATION (SURVEY REQUIRED)

C1. Building elevations are based on: ☐ Construction Drawings* ☑ Building Under Construction* ☐ Finished Construction
*A new Elevation Certificate will be required when construction of the building is complete.

C2. Elevations – Zones A1–A30, AE, AH, AO, A (with BFE), VE, V1–V30, V (with BFE), AR, AR/A, AR/AE, AR/A1–A30, AR/AH, AR/AO, A99. Complete Items C2.a–h below according to the Building Diagram specified in Item A7. In Puerto Rico only, enter meters.

Benchmark Utilized: *Geoid 18* Vertical Datum: *NAVD88*

Indicate elevation datum used for the elevations in items a) through h) below.
☐ NGVD 1929 ☑ NAVD 1988 ☐ Other:

Datum used for building elevations must be the same as that used for the BFE. Conversion factor used? ☐ Yes ☑ No
If Yes, describe the source of the conversion factor in the Section D Comments area.

		Check the measurement used:	
a) Top of bottom floor (including basement, crawlspace, or enclosure floor):	*NA*	☐ feet	☐ meters
b) Top of the next higher floor (see Instructions):	*NA*	☐ feet	☐ meters
c) Bottom of the lowest horizontal structural member (see Instructions):	*NA*	☐ feet	☐ meters
d) Attached garage (top of slab):	*NA*	☐ feet	☐ meters
e) Lowest elevation of Machinery and Equipment (M&E) servicing the building (describe type of M&E and location in Section D Comments area):	*NA*	☐ feet	☐ meters
f) Lowest Adjacent Grade (LAG) next to building: ☑ Natural ☐ Finished	*24.0*	☑ feet	☐ meters
g) Highest Adjacent Grade (HAG) next to building: ☐ Natural ☐ Finished	*NA*	☐ feet	☐ meters
h) Finished LAG at lowest elevation of attached deck or stairs, including structural support:	*NA*	☐ feet	☐ meters

SECTION D – SURVEYOR, ENGINEER, OR ARCHITECT CERTIFICATION

This certification is to be signed and sealed by a land surveyor, engineer, or architect authorized by state law to certify elevation information. *I certify that the information on this Certificate represents my best efforts to interpret the data available. I understand that any false statement may be punishable by fine or imprisonment under 18 U.S. Code, Section 1001.*

Were latitude and longitude in Section A provided by a licensed land surveyor? ☑ Yes ☐ No

☐ Check here if attachments and describe in the Comments area.

Certifier's Name: *Brent H Knapp* License Number: *PLS81116*

Title: *Professional Land Surveyor*

Company Name: *i.e. Engineering, Inc.*

Address: *809 SE Pine Street*

City: *Roseburg* State: *OR* ZIP Code: *97470*

Telephone: *(541) 673-0166* Ext.: Email: *knapp@ieengineering.com*

Signature: Date: *01/16/2024*

REGISTERED PROFESSIONAL LAND SURVEYOR
OREGON
NOVEMBER 10, 2010
BRENT H. KNAPP
81116
RENEWS: 6/30/2025
Place Seal Here

Copy all pages of this Elevation Certificate and all attachments for (1) community official, (2) insurance agent/company, and (3) building owner.

Comments (including source of conversion factor in C2; type of equipment and location per C2.e; and description of any attachments):
Pre-Construction for Men's Restroom

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.:	FOR INSURANCE COMPANY USE
PO BOX 1345	Policy Number:
City: Springfield State: OR ZIP Code: 97477	Company NAIC Number:

SECTION E – BUILDING MEASUREMENT INFORMATION (SURVEY NOT REQUIRED) FOR ZONE AO, ZONE AR/AO, AND ZONE A (WITHOUT BFE)

For Zones AO, AR/AO, and A (without BFE), complete Items E1–E5. For Items E1–E4, use natural grade, if available. If the Certificate is intended to support a Letter of Map Change request, complete Sections A, B, and C. Check the measurement used. In Puerto Rico only, enter meters.

Building measurements are based on: ☐ Construction Drawings* ☐ Building Under Construction* ☐ Finished Construction
*A new Elevation Certificate will be required when construction of the building is complete.

E1. Provide measurements (C.2.a in applicable Building Diagram) for the following and check the appropriate boxes to show whether the measurement is above or below the natural HAG and the LAG.

a) Top of bottom floor (including basement,crawlspace, or enclosure) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

b) Top of bottom floor (including basement,crawlspace, or enclosure) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the LAG.

E2. For Building Diagrams 6–9 with permanent flood openings provided in Section A Items 8 and/or 9 (see pages 1–2 of Instructions), the next higher floor (C2.b in applicable Building Diagram) of the building is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E3. Attached garage (top of slab) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E4. Top of platform of machinery and/or equipment servicing the building is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E5. Zone AO only: If no flood depth number is available, is the top of the bottom floor elevated in accordance with the community's floodplain management ordinance? ☐ Yes ☐ No ☐ Unknown The local official must certify this information in Section G.

SECTION F – PROPERTY OWNER (OR OWNER'S AUTHORIZED REPRESENTATIVE) CERTIFICATION

The property owner or owner's authorized representative who completes Sections A, B, and E for Zone A (without BFE) or Zone AO must sign here. *The statements in Sections A, B, and E are correct to the best of my knowledge*

☐ Check here if attachments and describe in the Comments area.

Property Owner or Owner's Authorized Representative Name: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ Email: _____

Signature: _____ Date: _____

Comments:

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: PO BOX 1345

City: Springfield State: OR ZIP Code: 97477

FOR INSURANCE COMPANY USE

Policy Number: _____

Company NAIC Number: _____

SECTION G – COMMUNITY INFORMATION (RECOMMENDED FOR COMMUNITY OFFICIAL COMPLETION)

The local official who is authorized by law or ordinance to administer the community's floodplain management ordinance can complete Section A, B, C, E, G, or H of this Elevation Certificate. Complete the applicable item(s) and sign below when:

G1. ☐ The information in Section C was taken from other documentation that has been signed and sealed by a licensed surveyor, engineer, or architect who is authorized by state law to certify elevation information. (Indicate the source and date of the elevation data in the Comments area below.)

G2.a. ☐ A local official completed Section E for a building located in Zone A (without a BFE), Zone AO, or Zone AR/AO, or when item E5 is completed for a building located in Zone AO.

G2.b. ☐ A local official completed Section H for insurance purposes.

G3. ☐ In the Comments area of Section G, the local official describes specific corrections to the information in Sections A, B, E and H.

G4. ☐ The following information (Items G5–G11) is provided for community floodplain management purposes.

G5. Permit Number: _____ G6. Date Permit Issued: _____

G7. Date Certificate of Compliance/Occupancy Issued: _____

G8. This permit has been issued for: ☐ New Construction ☐ Substantial Improvement

G9.a. Elevation of as-built lowest floor (including basement) of the building: _____ ☐ feet ☐ meters Datum: _____

G9.b. Elevation of bottom of as-built lowest horizontal structural member: _____ ☐ feet ☐ meters Datum: _____

G10.a. BFE (or depth in Zone AO) of flooding at the building site: _____ ☐ feet ☐ meters Datum: _____

G10.b. Community's minimum elevation (or depth in Zone AO)requirement for the lowest floor or lowest horizontal structural member: _____ ☐ feet ☐ meters Datum: _____

G11. Variance issued? ☐ Yes ☐ No If yes, attach documentation and describe in the Comments area.

The local official who provides information in Section G must sign here. *I have completed the information in Section G and certify that it is correct to the best of my knowledge. If applicable, I have also provided specific corrections in the Comments area of this section.*

Local Official's Name: _____ Title: _____

NFIP Community Name: _____

Telephone: Ext.: _____ Email: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Signature: _____ Date: _____

Comments (including type of equipment and location, per C2.e; description of any attachments; and corrections to specific information in Sections A, B, D, E, or H):

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.:	FOR INSURANCE COMPANY USE
PO BOX 1345	Policy Number:
City: *Springfield* State: *OR* ZIP Code: *97477*	Company NAIC Number:

SECTION H – BUILDING'S FIRST FLOOR HEIGHT INFORMATION FOR ALL ZONES (SURVEY NOT REQUIRED) (FOR INSURANCE PURPOSES ONLY)

The property owner, owner's authorized representative, or local floodplain management official may complete Section H for all flood zones to determine the building's first floor height for insurance purposes. Sections A, B, and I must also be completed. Enter heights to the nearest tenth of a foot (nearest tenth of a meter in Puerto Rico). ***Reference the Foundation Type Diagrams (at the end of Section H Instructions) and the appropriate Building Diagrams (at the end of Section I Instructions) to complete this section.***

H1. Provide the height of the top of the floor (as indicated in Foundation Type Diagrams) above the Lowest Adjacent Grade (LAG):

a) **For Building Diagrams 1A, 1B, 3, and 5–8.** Top of bottom floor (include above-grade floors only for buildings with crawlspaces or enclosure floors) is: _____ ☐ feet ☐ meters ☐ above the LAG

b) **For Building Diagrams 2A, 2B, 4, and 6–9.** Top of next higher floor (i.e., the floor above basement, crawlspace, or enclosure floor) is: _____ ☐ feet ☐ meters ☐ above the LAG

H2. Is **all** Machinery and Equipment servicing the building (as listed in Item H2 instructions) elevated to or above the floor indicated by the H2 arrow (shown in the Foundation Type Diagrams at end of Section H instructions) for the appropriate Building Diagram?

☐ Yes ☐ No

SECTION I – PROPERTY OWNER (OR OWNER'S AUTHORIZED REPRESENTATIVE) CERTIFICATION

The property owner or owner's authorized representative who completes Sections A, B, and H must sign here. *The statements in Sections A, B, and H are correct to the best of my knowledge.* **Note:** If the local floodplain management official completed Section H, they should indicate in Item G2.b and sign Section G.

☐ Check here if attachments are provided (including required photos) and describe each attachment in the Comments area.

Property Owner or Owner's Authorized Representative Name: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ Email: _____

Signature: _____ Date: _____

Comments:

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

BUILDING PHOTOGRAPHS

See Instructions for Item A6.

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

Instructions: Insert below at least two and when possible four photographs showing each side of the building (for example, may only be able to take front and back pictures of townhouses/rowhouses). Identify all photographs with the date taken and "Front View," "Rear View," "Right Side View," or "Left Side View." Photographs must show the foundation. When flood openings are present, include at least one close-up photograph of representative flood openings or vents, as indicated in Sections A8 and A9.

Photo One

Photo One Caption:

Clear Photo One

Photo Two

Photo Two Caption:

Clear Photo Two

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

BUILDING PHOTOGRAPHS

Continuation Page

Building Street Address (including Apt., Unit, Suite, ~~and/or~~ Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

Insert the third and fourth photographs below. Identify all photographs with the date taken and "Front View," "Rear View," "Right Side View," or "Left Side View." When flood openings are present, include at least one close-up photograph of representative flood openings or vents, as indicated in Sections A8 and A9.

Photo Three

Photo Three Caption:

Clear Photo Three

Photo Four

Photo Four Caption:

Clear Photo Four

Form Instructions

U.S. DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency
National Flood Insurance Program

OMB Control No. 1660-0008
Expiration Date: 06/30/2026

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Copy all pages of this Elevation Certificate and all attachments for (1) community official, (2) insurance agent/company, and (3) building owner.

SECTION A – PROPERTY INFORMATION

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

A1. Building Owner's Name: *Outdoorsuperstar, LLC*

A2. Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

A3. Property Description (e.g., Lot and Block Numbers or Legal Description) and/or Tax Parcel Number:
Tax Lot 1000, T28S R14W, Section 17, Coos County, Tax Account #9555501

A4. Building Use (e.g., Residential, Non-Residential, Addition, Accessory, etc.): *Non-Residential*

A5. Latitude/Longitude: Lat. *43°08'43.59"* Long. *-124°23'36.32"* Horiz. Datum: ☐ NAD 1927 ☑ NAD 1983 ☐ WGS 84

A6. Attach at least two and when possible four clear color photographs (one for each side) of the building (see Form pages 7 and 8).

A7. Building Diagram Number:

A8. For a building with a crawlspace or enclosure(s):

a) Square footage of crawlspace or enclosure(s): *NA* sq. ft.

b) Is there at least one permanent flood opening on two different sides of each enclosed area? ☐ Yes ☐ No ☑ N/A

c) Enter number of permanent flood openings in the crawlspace or enclosure(s) within 1.0 foot above adjacent grade:
Non-engineered flood openings: *NA* Engineered flood openings: *NA*

d) Total net open area of non-engineered flood openings in A8.c: *NA* sq. in.

e) Total rated area of engineered flood openings in A8.c (attach documentation – see Instructions): *NA* sq. ft.

f) Sum of A8.d and A8.e rated area (if applicable – see Instructions): *NA* sq. ft.

A9. For a building with an attached garage:

a) Square footage of attached garage: *NA* sq. ft.

b) Is there at least one permanent flood opening on two different sides of the attached garage? ☐ Yes ☐ No ☑ N/A

c) Enter number of permanent flood openings in the attached garage within 1.0 foot above adjacent grade:
Non-engineered flood openings: *NA* Engineered flood openings: *NA*

d) Total net open area of non-engineered flood openings in A9.c: *NA* sq. in.

e) Total rated area of engineered flood openings in A9.c (attach documentation – see Instructions): *NA* sq. ft.

f) Sum of A9.d and A9.e rated area (if applicable – see Instructions): *NA* sq. ft.

SECTION B – FLOOD INSURANCE RATE MAP (FIRM) INFORMATION

B1.a. NFIP Community Name: *Coos County* B1.b. NFIP Community Identification Number: *410042*

B2. County Name: *Coos* B3. State: *OR* B4. Map/Panel No.: *41011C0494* B5. Suffix: *F*

B6. FIRM Index Date: *12/07/2018* B7. FIRM Panel Effective/Revised Date: *12/07/2018*

B8. Flood Zone(s): *A* B9. Base Flood Elevation(s) (BFE) (Zone AO, use Base Flood Depth): *16.0*

B10. Indicate the source of the BFE data or Base Flood Depth entered in Item B9:
☐ FIS ☐ FIRM ☐ Community Determined ☑ Other:

B11. Indicate elevation datum used for BFE in Item B9: ☐ NGVD 1929 ☑ NAVD 1988 ☐ Other/Source:

B12. Is the building located in a Coastal Barrier Resources System (CBRS) area or Otherwise Protected Area (OPA)? ☐ Yes ☑ No
Designation Date: ☐ CBRS ☐ OPA

B13. Is the building located seaward of the Limit of Moderate Wave Action (LiMWA)? ☐ Yes ☑ No

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

SECTION C – BUILDING ELEVATION INFORMATION (SURVEY REQUIRED)

C1. Building elevations are based on: ☐ Construction Drawings* ☑ Building Under Construction* ☐ Finished Construction
*A new Elevation Certificate will be required when construction of the building is complete.

C2. Elevations – Zones A1–A30, AE, AH, AO, A (with BFE), VE, V1–V30, V (with BFE), AR, AR/A, AR/AE, AR/A1–A30, AR/AH, AR/AO, A99. Complete Items C2.a–h below according to the Building Diagram specified in Item A7. In Puerto Rico only, enter meters.

Benchmark Utilized: *Geoid 18* Vertical Datum: *NAVD88*

Indicate elevation datum used for the elevations in items a) through h) below.
☐ NGVD 1929 ☑ NAVD 1988 ☐ Other:

Datum used for building elevations must be the same as that used for the BFE. Conversion factor used? ☐ Yes ☑ No
If Yes, describe the source of the conversion factor in the Section D Comments area.

		Check the measurement used:	
a) Top of bottom floor (including basement, crawlspace, or enclosure floor):	*NA*	☐ feet	☐ meters
b) Top of the next higher floor (see Instructions):	*NA*	☐ feet	☐ meters
c) Bottom of the lowest horizontal structural member (see Instructions):	*NA*	☐ feet	☐ meters
d) Attached garage (top of slab):	*NA*	☐ feet	☐ meters
e) Lowest elevation of Machinery and Equipment (M&E) servicing the building (describe type of M&E and location in Section D Comments area):	*NA*	☐ feet	☐ meters
f) Lowest Adjacent Grade (LAG) next to building: ☑ Natural ☐ Finished	*16.3*	☑ feet	☐ meters
g) Highest Adjacent Grade (HAG) next to building: ☐ Natural ☐ Finished	*NA*	☐ feet	☐ meters
h) Finished LAG at lowest elevation of attached deck or stairs, including structural support:	*NA*	☐ feet	☐ meters

SECTION D – SURVEYOR, ENGINEER, OR ARCHITECT CERTIFICATION

This certification is to be signed and sealed by a land surveyor, engineer, or architect authorized by state law to certify elevation information. *I certify that the information on this Certificate represents my best efforts to interpret the data available. I understand that any false statement may be punishable by fine or imprisonment under 18 U.S. Code, Section 1001.*

Were latitude and longitude in Section A provided by a licensed land surveyor? ☑ Yes ☐ No

☐ Check here if attachments and describe in the Comments area.

Certifier's Name: *Brent H Knapp* License Number: *PLS81116*

Title: *Professional Land Surveyor*

Company Name: *i.e. Engineering, Inc.*

Address: *809 SE Pine Street*

City: *Roseburg* State: *OR* ZIP Code: *97470*

Telephone: *(541) 673-0166* Ext.: Email: *knapp@ieengineering.com*

Signature: Date: *01/16/2024*

REGISTERED PROFESSIONAL LAND SURVEYOR
OREGON
NOVEMBER 10, 2010
BRENT H. KNAPP
81116
Expires: 6/30/2025
Place Seal Here

Copy all pages of this Elevation Certificate and all attachments for (1) community official, (2) insurance agent/company, and (3) building owner.

Comments (including source of conversion factor in C2; type of equipment and location per C2.e; and description of any attachments):
Pre-Construction for Security Station

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number: _____

Company NAIC Number: _____

SECTION E – BUILDING MEASUREMENT INFORMATION (SURVEY NOT REQUIRED) FOR ZONE AO, ZONE AR/AO, AND ZONE A (WITHOUT BFE)

For Zones AO, AR/AO, and A (without BFE), complete Items E1–E5. For Items E1–E4, use natural grade, if available. If the Certificate is intended to support a Letter of Map Change request, complete Sections A, B, and C. Check the measurement used. In Puerto Rico only, enter meters.

Building measurements are based on: ☐ Construction Drawings* ☐ Building Under Construction* ☐ Finished Construction

*A new Elevation Certificate will be required when construction of the building is complete.

E1. Provide measurements (C.2.a in applicable Building Diagram) for the following and check the appropriate boxes to show whether the measurement is above or below the natural HAG and the LAG.

a) Top of bottom floor (including basement,crawlspace, or enclosure) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

b) Top of bottom floor (including basement,crawlspace, or enclosure) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the LAG.

E2. For Building Diagrams 6–9 with permanent flood openings provided in Section A Items 8 and/or 9 (see pages 1–2 of Instructions), the next higher floor (C2.b in applicable Building Diagram) of the building is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E3. Attached garage (top of slab) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E4. Top of platform of machinery and/or equipment servicing the building is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E5. Zone AO only: If no flood depth number is available, is the top of the bottom floor elevated in accordance with the community's floodplain management ordinance? ☐ Yes ☐ No ☐ Unknown The local official must certify this information in Section G.

SECTION F – PROPERTY OWNER (OR OWNER'S AUTHORIZED REPRESENTATIVE) CERTIFICATION

The property owner or owner's authorized representative who completes Sections A, B, and E for Zone A (without BFE) or Zone AO must sign here. *The statements in Sections A, B, and E are correct to the best of my knowledge*

☐ Check here if attachments and describe in the Comments area.

Property Owner or Owner's Authorized Representative Name: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ Email: _____

Signature: _____ Date: _____

Comments:

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: PO BOX 1345

City: Springfield State: OR ZIP Code: 97477

FOR INSURANCE COMPANY USE

Policy Number: _____

Company NAIC Number: _____

SECTION G – COMMUNITY INFORMATION (RECOMMENDED FOR COMMUNITY OFFICIAL COMPLETION)

The local official who is authorized by law or ordinance to administer the community's floodplain management ordinance can complete Section A, B, C, E, G, or H of this Elevation Certificate. Complete the applicable item(s) and sign below when:

G1. ☐ The information in Section C was taken from other documentation that has been signed and sealed by a licensed surveyor, engineer, or architect who is authorized by state law to certify elevation information. (Indicate the source and date of the elevation data in the Comments area below.)

G2.a. ☐ A local official completed Section E for a building located in Zone A (without a BFE), Zone AO, or Zone AR/AO, or when item E5 is completed for a building located in Zone AO.

G2.b. ☐ A local official completed Section H for insurance purposes.

G3. ☐ In the Comments area of Section G, the local official describes specific corrections to the information in Sections A, B, E and H.

G4. ☐ The following information (Items G5–G11) is provided for community floodplain management purposes.

G5. Permit Number: _____ G6. Date Permit Issued: _____

G7. Date Certificate of Compliance/Occupancy Issued: _____

G8. This permit has been issued for: ☐ New Construction ☐ Substantial Improvement

G9.a. Elevation of as-built lowest floor (including basement) of the building: _____ ☐ feet ☐ meters Datum: _____

G9.b. Elevation of bottom of as-built lowest horizontal structural member: _____ ☐ feet ☐ meters Datum: _____

G10.a. BFE (or depth in Zone AO) of flooding at the building site: _____ ☐ feet ☐ meters Datum: _____

G10.b. Community's minimum elevation (or depth in Zone AO)requirement for the lowest floor or lowest horizontal structural member: _____ ☐ feet ☐ meters Datum: _____

G11. Variance issued? ☐ Yes ☐ No If yes, attach documentation and describe in the Comments area.

The local official who provides information in Section G must sign here. *I have completed the information in Section G and certify that it is correct to the best of my knowledge. If applicable, I have also provided specific corrections in the Comments area of this section.*

Local Official's Name: _____ Title: _____

NFIP Community Name: _____

Telephone: Ext.: _____ Email: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Signature: _____ Date: _____

Comments (including type of equipment and location, per C2.e; description of any attachments; and corrections to specific information in Sections A, B, D, E, or H):

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.:	FOR INSURANCE COMPANY USE
PO BOX 1345	Policy Number:
City: *Springfield* State: *OR* ZIP Code: *97477*	Company NAIC Number:

SECTION H – BUILDING'S FIRST FLOOR HEIGHT INFORMATION FOR ALL ZONES (SURVEY NOT REQUIRED) (FOR INSURANCE PURPOSES ONLY)

The property owner, owner's authorized representative, or local floodplain management official may complete Section H for all flood zones to determine the building's first floor height for insurance purposes. Sections A, B, and I must also be completed. Enter heights to the nearest tenth of a foot (nearest tenth of a meter in Puerto Rico). ***Reference the Foundation Type Diagrams (at the end of Section H Instructions) and the appropriate Building Diagrams (at the end of Section I Instructions) to complete this section.***

H1. Provide the height of the top of the floor (as indicated in Foundation Type Diagrams) above the Lowest Adjacent Grade (LAG):

a) **For Building Diagrams 1A, 1B, 3, and 5–8.** Top of bottom floor (include above-grade floors only for buildings with crawlspaces or enclosure floors) is: _____ ☐ feet ☐ meters ☐ above the LAG

b) **For Building Diagrams 2A, 2B, 4, and 6–9.** Top of next higher floor (i.e., the floor above basement, crawlspace, or enclosure floor) is: _____ ☐ feet ☐ meters ☐ above the LAG

H2. Is **all** Machinery and Equipment servicing the building (as listed in Item H2 instructions) elevated to or above the floor indicated by the H2 arrow (shown in the Foundation Type Diagrams at end of Section H instructions) for the appropriate Building Diagram?

☐ Yes ☐ No

SECTION I – PROPERTY OWNER (OR OWNER'S AUTHORIZED REPRESENTATIVE) CERTIFICATION

The property owner or owner's authorized representative who completes Sections A, B, and H must sign here. *The statements in Sections A, B, and H are correct to the best of my knowledge.* **Note:** If the local floodplain management official completed Section H, they should indicate in Item G2.b and sign Section G.

☐ Check here if attachments are provided (including required photos) and describe each attachment in the Comments area.

Property Owner or Owner's Authorized Representative Name: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ Email: _____

Signature: _____ Date: _____

Comments:

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

BUILDING PHOTOGRAPHS

See Instructions for Item A6.

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

Instructions: Insert below at least two and when possible four photographs showing each side of the building (for example, may only be able to take front and back pictures of townhouses/rowhouses). Identify all photographs with the date taken and "Front View," "Rear View," "Right Side View," or "Left Side View." Photographs must show the foundation. When flood openings are present, include at least one close-up photograph of representative flood openings or vents, as indicated in Sections A8 and A9.

Photo One

Photo One Caption:

Clear Photo One

Photo Two

Photo Two Caption:

Clear Photo Two

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

BUILDING PHOTOGRAPHS

Continuation Page

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

Insert the third and fourth photographs below. Identify all photographs with the date taken and "Front View," "Rear View," "Right Side View," or "Left Side View." When flood openings are present, include at least one close-up photograph of representative flood openings or vents, as indicated in Sections A8 and A9.

Photo Three

Photo Three Caption:

Clear Photo Three

Photo Four

Photo Four Caption:

Clear Photo Four

Form Instructions

U.S. DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency
National Flood Insurance Program

OMB Control No. 1660-0008
Expiration Date: 06/30/2026

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Copy all pages of this Elevation Certificate and all attachments for (1) community official, (2) insurance agent/company, and (3) building owner.

SECTION A – PROPERTY INFORMATION

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

A1. Building Owner's Name: *Outdoorsuperstar, LLC*

A2. Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

A3. Property Description (e.g., Lot and Block Numbers or Legal Description) and/or Tax Parcel Number:
Tax Lot 1000, T28S R14W, Section 17, Coos County, Tax Account #9555501

A4. Building Use (e.g., Residential, Non-Residential, Addition, Accessory, etc.): *Non-Residential*

A5. Latitude/Longitude: Lat. *43°08'43.59"* Long. *-124°23'36.32"* Horiz. Datum: ☐ NAD 1927 ☑ NAD 1983 ☐ WGS 84

A6. Attach at least two and when possible four clear color photographs (one for each side) of the building (see Form pages 7 and 8).

A7. Building Diagram Number:

A8. For a building with a crawlspace or enclosure(s):

a) Square footage of crawlspace or enclosure(s): *NA* sq. ft.

b) Is there at least one permanent flood opening on two different sides of each enclosed area? ☐ Yes ☐ No ☑ N/A

c) Enter number of permanent flood openings in the crawlspace or enclosure(s) within 1.0 foot above adjacent grade:
Non-engineered flood openings: *NA* Engineered flood openings: *NA*

d) Total net open area of non-engineered flood openings in A8.c: *NA* sq. in.

e) Total rated area of engineered flood openings in A8.c (attach documentation – see Instructions): *NA* sq. ft.

f) Sum of A8.d and A8.e rated area (if applicable – see Instructions): *NA* sq. ft.

A9. For a building with an attached garage:

a) Square footage of attached garage: *NA* sq. ft.

b) Is there at least one permanent flood opening on two different sides of the attached garage? ☐ Yes ☐ No ☑ N/A

c) Enter number of permanent flood openings in the attached garage within 1.0 foot above adjacent grade:
Non-engineered flood openings: *NA* Engineered flood openings: *NA*

d) Total net open area of non-engineered flood openings in A9.c: *NA* sq. in.

e) Total rated area of engineered flood openings in A9.c (attach documentation – see Instructions): *NA* sq. ft.

f) Sum of A9.d and A9.e rated area (if applicable – see Instructions): *NA* sq. ft.

SECTION B – FLOOD INSURANCE RATE MAP (FIRM) INFORMATION

B1.a. NFIP Community Name: *Coos County* B1.b. NFIP Community Identification Number: *410042*

B2. County Name: *Coos* B3. State: *OR* B4. Map/Panel No.: *41011C0494* B5. Suffix: *F*

B6. FIRM Index Date: *12/07/2018* B7. FIRM Panel Effective/Revised Date: *12/07/2018*

B8. Flood Zone(s): *A* B9. Base Flood Elevation(s) (BFE) (Zone AO, use Base Flood Depth): *16.0*

B10. Indicate the source of the BFE data or Base Flood Depth entered in Item B9:
☐ FIS ☐ FIRM ☐ Community Determined ☑ Other:

B11. Indicate elevation datum used for BFE in Item B9: ☐ NGVD 1929 ☑ NAVD 1988 ☐ Other/Source:

B12. Is the building located in a Coastal Barrier Resources System (CBRS) area or Otherwise Protected Area (OPA)? ☐ Yes ☑ No
Designation Date: ☐ CBRS ☐ OPA

B13. Is the building located seaward of the Limit of Moderate Wave Action (LiMWA)? ☐ Yes ☑ No

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

SECTION C – BUILDING ELEVATION INFORMATION (SURVEY REQUIRED)

C1. Building elevations are based on: ☐ Construction Drawings* ☑ Building Under Construction* ☐ Finished Construction
*A new Elevation Certificate will be required when construction of the building is complete.

C2. Elevations – Zones A1–A30, AE, AH, AO, A (with BFE), VE, V1–V30, V (with BFE), AR, AR/A, AR/AE, AR/A1–A30, AR/AH, AR/AO, A99. Complete Items C2.a–h below according to the Building Diagram specified in Item A7. In Puerto Rico only, enter meters.

Benchmark Utilized: *Geoid 18* Vertical Datum: *NAVD88*

Indicate elevation datum used for the elevations in items a) through h) below.
☐ NGVD 1929 ☑ NAVD 1988 ☐ Other:

Datum used for building elevations must be the same as that used for the BFE. Conversion factor used? ☐ Yes ☑ No
If Yes, describe the source of the conversion factor in the Section D Comments area.

		Check the measurement used:	
a) Top of bottom floor (including basement, crawlspace, or enclosure floor):	*NA*	☐ feet	☐ meters
b) Top of the next higher floor (see Instructions):	*NA*	☐ feet	☐ meters
c) Bottom of the lowest horizontal structural member (see Instructions):	*NA*	☐ feet	☐ meters
d) Attached garage (top of slab):	*NA*	☐ feet	☐ meters
e) Lowest elevation of Machinery and Equipment (M&E) servicing the building (describe type of M&E and location in Section D Comments area):	*NA*	☐ feet	☐ meters
f) Lowest Adjacent Grade (LAG) next to building: ☑ Natural ☐ Finished	*16.7*	☑ feet	☐ meters
g) Highest Adjacent Grade (HAG) next to building: ☐ Natural ☐ Finished	*NA*	☐ feet	☐ meters
h) Finished LAG at lowest elevation of attached deck or stairs, including structural support:	*NA*	☐ feet	☐ meters

SECTION D – SURVEYOR, ENGINEER, OR ARCHITECT CERTIFICATION

This certification is to be signed and sealed by a land surveyor, engineer, or architect authorized by state law to certify elevation information. *I certify that the information on this Certificate represents my best efforts to interpret the data available. I understand that any false statement may be punishable by fine or imprisonment under 18 U.S. Code, Section 1001.*

Were latitude and longitude in Section A provided by a licensed land surveyor? ☑ Yes ☐ No

☐ Check here if attachments and describe in the Comments area.

Certifier's Name: *Brent H Knapp* License Number: *PLS81116*

Title: *Professional Land Surveyor*

Company Name: *i.e. Engineering, Inc.*

Address: *809 SE Pine Street*

City: *Roseburg* State: *OR* ZIP Code: *97470*

Telephone: *(541) 673-0166* Ext.: Email: *knapp@ieengineering.com*

REGISTERED PROFESSIONAL LAND SURVEYOR
OREGON
NOVEMBER 10, 2010
BRENT H. KNAPP
81116
EXPIRES: 6/30/2023

Signature: Date: *01/16/2024*

Place Seal Here

Copy all pages of this Elevation Certificate and all attachments for (1) community official, (2) insurance agent/company, and (3) building owner.

Comments (including source of conversion factor in C2; type of equipment and location per C2.e; and description of any attachments):
Pre-Construction for Clubhouse

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number: _____

Company NAIC Number: _____

SECTION E – BUILDING MEASUREMENT INFORMATION (SURVEY NOT REQUIRED) FOR ZONE AO, ZONE AR/AO, AND ZONE A (WITHOUT BFE)

For Zones AO, AR/AO, and A (without ~~BFE~~), complete Items E1–E5. For Items E1–E4, use natural grade, if available. If the Certificate is intended to support a Letter of Map Change request, complete Sections A, B, and C. Check the measurement used. In Puerto Rico only, enter meters.

Building measurements are based on: ☐ Construction Drawings* ☐ Building Under Construction* ☐ Finished Construction

*A new Elevation Certificate will be required when construction of the building is complete.

E1. Provide measurements (C.2.a in applicable Building Diagram) for the following and check the appropriate boxes to show whether the measurement is above or below the natural HAG and the LAG.

a) Top of bottom floor (including basement,crawlspace, or enclosure) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

b) Top of bottom floor (including basement,crawlspace, or enclosure) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the LAG.

E2. For Building Diagrams 6–9 with permanent flood openings provided in Section A Items 8 and/or 9 (see pages 1–2 of Instructions), the next higher floor (C2.b in applicable Building Diagram) of the building is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E3. Attached garage (top of slab) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E4. Top of platform of machinery and/or equipment servicing the building is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E5. Zone AO only: If no flood depth number is available, is the top of the bottom floor elevated in accordance with the community's floodplain management ordinance? ☐ Yes ☐ No ☐ Unknown The local official must certify this information in Section G.

SECTION F – PROPERTY OWNER (OR OWNER'S AUTHORIZED REPRESENTATIVE) CERTIFICATION

The property owner or owner's authorized representative who completes Sections A, B, and E for Zone A (without BFE) or Zone AO must sign here. *The statements in Sections A, B, and E are correct to the best of my knowledge*

☐ Check here if attachments and describe in the Comments area.

Property Owner or Owner's Authorized Representative Name: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ Email: _____

Signature: _____ Date: _____

Comments:

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number: _____

Company NAIC Number: _____

SECTION G – COMMUNITY INFORMATION (RECOMMENDED FOR COMMUNITY OFFICIAL COMPLETION)

The local official who is authorized by law or ordinance to administer the community's floodplain management ordinance can complete Section A, B, C, E, G, or H of this Elevation Certificate. Complete the applicable item(s) and sign below when:

G1. ☐ The information in Section C was taken from other documentation that has been signed and sealed by a licensed surveyor, engineer, or architect who is authorized by state law to certify elevation information. (Indicate the source and date of the elevation data in the Comments area below.)

G2.a. ☐ A local official completed Section E for a building located in Zone A (without a BFE), Zone AO, or Zone AR/AO, or when item E5 is completed for a building located in Zone AO.

G2.b. ☐ A local official completed Section H for insurance purposes.

G3. ☐ In the Comments area of Section G, the local official describes specific corrections to the information in Sections A, B, E and H.

G4. ☐ The following information (Items G5–G11) is provided for community floodplain management purposes.

G5. Permit Number: _____ G6. Date Permit Issued: _____

G7. Date Certificate of Compliance/Occupancy Issued: _____

G8. This permit has been issued for: ☐ New Construction ☐ Substantial Improvement

G9.a. Elevation of as-built lowest floor (including basement) of the building: _____ ☐ feet ☐ meters Datum: _____

G9.b. Elevation of bottom of as-built lowest horizontal structural member: _____ ☐ feet ☐ meters Datum: _____

G10.a. BFE (or depth in Zone AO) of flooding at the building site: _____ ☐ feet ☐ meters Datum: _____

G10.b. Community's minimum elevation (or depth in Zone AO)requirement for the lowest floor or lowest horizontal structural member: _____ ☐ feet ☐ meters Datum: _____

G11. Variance issued? ☐ Yes ☐ No If yes, attach documentation and describe in the Comments area.

The local official who provides information in Section G must sign here. *I have completed the information in Section G and certify that it is correct to the best of my knowledge. If applicable, I have also provided specific corrections in the Comments area of this section.*

Local Official's Name: _____ Title: _____

NFIP Community Name: _____

Telephone: _____ Ext.: _____ Email: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Signature: _____ Date: _____

Comments (including type of equipment and location, per C2.e; description of any attachments; and corrections to specific information in Sections A, B, D, E, or H):

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

SECTION H – BUILDING'S FIRST FLOOR HEIGHT INFORMATION FOR ALL ZONES (SURVEY NOT REQUIRED) (FOR INSURANCE PURPOSES ONLY)

The property owner, owner's authorized representative, or local floodplain management official may complete Section H for all flood zones to determine the building's first floor height for insurance purposes. Sections A, B, and I must also be completed. Enter heights to the nearest tenth of a foot (nearest tenth of a meter in Puerto Rico). ***Reference the Foundation Type Diagrams (at the end of Section H Instructions) and the appropriate Building Diagrams (at the end of Section I Instructions) to complete this section.***

H1. Provide the height of the top of the floor (as indicated in Foundation Type Diagrams) above the Lowest Adjacent Grade (LAG):

a) **For Building Diagrams 1A, 1B, 3, and 5–8.** Top of bottom floor (include above-grade floors only for buildings with crawlspaces or enclosure floors) is: _____ ☐ feet ☐ meters ☐ above the LAG

b) **For Building Diagrams 2A, 2B, 4, and 6–9.** Top of next higher floor (i.e., the floor above basement, crawlspace, or enclosure floor) is: _____ ☐ feet ☐ meters ☐ above the LAG

H2. Is **all** Machinery and Equipment servicing the building (as listed in Item H2 instructions) elevated to or above the floor indicated by the H2 arrow (shown in the Foundation Type Diagrams at end of Section H instructions) for the appropriate Building Diagram?

☐ Yes ☐ No

SECTION I – PROPERTY OWNER (OR OWNER'S AUTHORIZED REPRESENTATIVE) CERTIFICATION

The property owner or owner's authorized representative who completes Sections A, B, and H must sign here. *The statements in Sections A, B, and H are correct to the best of my knowledge.* **Note:** If the local floodplain management official completed Section H, they should indicate in Item G2.b and sign Section G.

☐ Check here if attachments are provided (including required photos) and describe each attachment in the Comments area.

Property Owner or Owner's Authorized Representative Name: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ Email: _____

Signature: _____ Date: _____

Comments:

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

BUILDING PHOTOGRAPHS

See Instructions for Item A6.

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

Instructions: Insert below at least two and when possible four photographs showing each side of the building (for example, may only be able to take front and back pictures of townhouses/rowhouses). Identify all photographs with the date taken and "Front View," "Rear View," "Right Side View," or "Left Side View." Photographs must show the foundation. When flood openings are present, include at least one close-up photograph of representative flood openings or vents, as indicated in Sections A8 and A9.

Photo One

Photo One Caption:

Clear Photo One

Photo Two

Photo Two Caption:

Clear Photo Two

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

BUILDING PHOTOGRAPHS

Continuation Page

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

Insert the third and fourth photographs below. Identify all photographs with the date taken and "Front View," "Rear View," "Right Side View," or "Left Side View." When flood openings are present, include at least one close-up photograph of representative flood openings or vents, as indicated in Sections A8 and A9.

Photo Three

Photo Three Caption:

Clear Photo Three

Photo Four

Photo Four Caption:

Clear Photo Four

Form Instructions

U.S. DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency
National Flood Insurance Program

OMB Control No. 1660-0008
Expiration Date: 06/30/2026

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Copy all pages of this Elevation Certificate and all attachments for (1) community official, (2) insurance agent/company, and (3) building owner.

SECTION A – PROPERTY INFORMATION

FOR INSURANCE COMPANY USE

Policy Number: _____

Company NAIC Number: _____

A1. Building Owner's Name: *Outdoorsuperstar, LLC*

A2. Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

A3. Property Description (e.g., Lot and Block Numbers or Legal Description) and/or Tax Parcel Number:
Tax Lot 1000, T28S R14W, Section 17, Coos County, Tax Account #9555501

A4. Building Use (e.g., Residential, Non-Residential, Addition, Accessory, etc.): *Non-Residential*

A5. Latitude/Longitude: Lat. *43°08'43.59"* Long. *-124°23'36.32"* Horiz. Datum: ☐ NAD 1927 ☑ NAD 1983 ☐ WGS 84

A6. Attach at least two and when possible four clear color photographs (one for each side) of the building (see Form pages 7 and 8).

A7. Building Diagram Number: _____

A8. For a building with a crawlspace or enclosure(s):

a) Square footage of crawlspace or enclosure(s): *NA* sq. ft.

b) Is there at least one permanent flood opening on two different sides of each enclosed area? ☐ Yes ☐ No ☑ N/A

c) Enter number of permanent flood openings in the crawlspace or enclosure(s) within 1.0 foot above adjacent grade:
Non-engineered flood openings: *NA* Engineered flood openings: *NA*

d) Total net open area of non-engineered flood openings in A8.c: *NA* sq. in.

e) Total rated area of engineered flood openings in A8.c (attach documentation – see Instructions): *NA* sq. ft.

f) Sum of A8.d and A8.e rated area (if applicable – see Instructions): *NA* sq. ft.

A9. For a building with an attached garage:

a) Square footage of attached garage: *NA* sq. ft.

b) Is there at least one permanent flood opening on two different sides of the attached garage? ☐ Yes ☐ No ☑ N/A

c) Enter number of permanent flood openings in the attached garage within 1.0 foot above adjacent grade:
Non-engineered flood openings: *NA* Engineered flood openings: *NA*

d) Total net open area of non-engineered flood openings in A9.c: *NA* sq. in.

e) Total rated area of engineered flood openings in A9.c (attach documentation – see Instructions): *NA* sq. ft.

f) Sum of A9.d and A9.e rated area (if applicable – see Instructions): *NA* sq. ft.

SECTION B – FLOOD INSURANCE RATE MAP (FIRM) INFORMATION

B1.a. NFIP Community Name: *Coos County* B1.b. NFIP Community Identification Number: *410042*

B2. County Name: *Coos* B3. State: *OR* B4. Map/Panel No.: *41011C0494* B5. Suffix: *F*

B6. FIRM Index Date: *12/07/2018* B7. FIRM Panel Effective/Revised Date: *12/07/2018*

B8. Flood Zone(s): *A* B9. Base Flood Elevation(s) (BFE) (Zone AO, use Base Flood Depth): *16.0*

B10. Indicate the source of the BFE data or Base Flood Depth entered in Item B9:
☐ FIS ☐ FIRM ☐ Community Determined ☑ Other: _____

B11. Indicate elevation datum used for BFE in Item B9: ☐ NGVD 1929 ☑ NAVD 1988 ☐ Other/Source: _____

B12. Is the building located in a Coastal Barrier Resources System (CBRS) area or Otherwise Protected Area (OPA)? ☐ Yes ☑ No
Designation Date: _____ ☐ CBRS ☐ OPA

B13. Is the building located seaward of the Limit of Moderate Wave Action (LiMWA)? ☐ Yes ☑ No

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

SECTION C – BUILDING ELEVATION INFORMATION (SURVEY REQUIRED)

C1. Building elevations are based on: ☐ Construction Drawings* ☑ Building Under Construction* ☐ Finished Construction
*A new Elevation Certificate will be required when construction of the building is complete.

C2. Elevations – Zones A1–A30, AE, AH, AO, A (with BFE), VE, V1–V30, V (with BFE), AR, AR/A, AR/AE, AR/A1–A30, AR/AH, AR/AO, A99. Complete Items C2.a–h below according to the Building Diagram specified in Item A7. In Puerto Rico only, enter meters.

Benchmark Utilized: *Geoid 18* Vertical Datum: *NAVD88*

Indicate elevation datum used for the elevations in items a) through h) below.
☐ NGVD 1929 ☑ NAVD 1988 ☐ Other:

Datum used for building elevations must be the same as that used for the BFE. Conversion factor used? ☐ Yes ☑ No
If Yes, describe the source of the conversion factor in the Section D Comments area.

		Check the measurement used:	
a) Top of bottom floor (including basement, crawlspace, or enclosure floor):	*NA*	☐ feet	☐ meters
b) Top of the next higher floor (see Instructions):	*NA*	☐ feet	☐ meters
c) Bottom of the lowest horizontal structural member (see Instructions):	*NA*	☐ feet	☐ meters
d) Attached garage (top of slab):	*NA*	☐ feet	☐ meters
e) Lowest elevation of Machinery and Equipment (M&E) servicing the building (describe type of M&E and location in Section D Comments area):	*NA*	☐ feet	☐ meters
f) Lowest Adjacent Grade (LAG) next to building: ☑ Natural ☐ Finished	*24.3*	☑ feet	☐ meters
g) Highest Adjacent Grade (HAG) next to building: ☐ Natural ☐ Finished	*NA*	☐ feet	☐ meters
h) Finished LAG at lowest elevation of attached deck or stairs, including structural support:	*NA*	☐ feet	☐ meters

SECTION D – SURVEYOR, ENGINEER, OR ARCHITECT CERTIFICATION

This certification is to be signed and sealed by a land surveyor, engineer, or architect authorized by state law to certify elevation information. *I certify that the information on this Certificate represents my best efforts to interpret the data available. I understand that any false statement may be punishable by fine or imprisonment under 18 U.S. Code, Section 1001.*

Were latitude and longitude in Section A provided by a licensed land surveyor? ☑ Yes ☐ No

☐ Check here if attachments and describe in the Comments area.

Certifier's Name: *Brent H Knapp* License Number: *PLS81116*

Title: *Professional Land Surveyor*

Company Name: *i.e. Engineering, Inc.*

Address: *809 SE Pine Street*

City: *Roseburg* State: *OR* ZIP Code: *97470*

Telephone: *(541) 673-0166* Ext.: Email: *knapp@ieengineering.com*

Signature: Date: *01/16/2024*

REGISTERED PROFESSIONAL LAND SURVEYOR
OREGON
NOVEMBER 10, 2010
BRENT H. KNAPP
81116
EXPIRES: 6/30/2025
Place Seal Here

Copy all pages of this Elevation Certificate and all attachments for (1) community official, (2) insurance agent/company, and (3) building owner.

Comments (including source of conversion factor in C2; type of equipment and location per C2.e; and description of any attachments):
Pre-Construction for Women's Restroom

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.:	FOR INSURANCE COMPANY USE
PO BOX 1345	Policy Number:
City: *Springfield* State: *OR* ZIP Code: *97477*	Company NAIC Number:

SECTION E – BUILDING MEASUREMENT INFORMATION (SURVEY NOT REQUIRED) FOR ZONE AO, ZONE AR/AO, AND ZONE A (WITHOUT BFE)

For Zones AO, AR/AO, and A (without BFE), complete Items E1–E5. For Items E1–E4, use natural grade, if available. If the Certificate is intended to support a Letter of Map Change request, complete Sections A, B, and C. Check the measurement used. In Puerto Rico only, enter meters.

Building measurements are based on: ☐ Construction Drawings* ☐ Building Under Construction* ☐ Finished Construction
*A new Elevation Certificate will be required when construction of the building is complete.

E1. Provide measurements (C.2.a in applicable Building Diagram) for the following and check the appropriate boxes to show whether the measurement is above or below the natural HAG and the LAG.

a) Top of bottom floor (including basement,crawlspace, or enclosure) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

b) Top of bottom floor (including basement,crawlspace, or enclosure) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the LAG.

E2. For Building Diagrams 6–9 with permanent flood openings provided in Section A Items 8 and/or 9 (see pages 1–2 of Instructions), the next higher floor (C2.b in applicable Building Diagram) of the building is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E3. Attached garage (top of slab) is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E4. Top of platform of machinery and/or equipment servicing the building is: _____ ☐ feet ☐ meters ☐ above or ☐ below the HAG.

E5. Zone AO only: If no flood depth number is available, is the top of the bottom floor elevated in accordance with the community's floodplain management ordinance? ☐ Yes ☐ No ☐ Unknown The local official must certify this information in Section G.

SECTION F – PROPERTY OWNER (OR OWNER'S AUTHORIZED REPRESENTATIVE) CERTIFICATION

The property owner or owner's authorized representative who completes Sections A, B, and E for Zone A (without BFE) or Zone AO must sign here. *The statements in Sections A, B, and E are correct to the best of my knowledge*

☐ Check here if attachments and describe in the Comments area.

Property Owner or Owner's Authorized Representative Name: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ Email: _____

Signature: _____ Date: _____

Comments:

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: PO BOX 1345

City: Springfield State: OR ZIP Code: 97477

FOR INSURANCE COMPANY USE

Policy Number: _____

Company NAIC Number: _____

SECTION G – COMMUNITY INFORMATION (RECOMMENDED FOR COMMUNITY OFFICIAL COMPLETION)

The local official who is authorized by law or ordinance to administer the community's floodplain management ordinance can complete Section A, B, C, E, G, or H of this Elevation Certificate. Complete the applicable item(s) and sign below when:

G1. ☐ The information in Section C was taken from other documentation that has been signed and sealed by a licensed surveyor, engineer, or architect who is authorized by state law to certify elevation information. (Indicate the source and date of the elevation data in the Comments area below.)

G2.a. ☐ A local official completed Section E for a building located in Zone A (without a BFE), Zone AO, or Zone AR/AO, or when item E5 is completed for a building located in Zone AO.

G2.b. ☐ A local official completed Section H for insurance purposes.

G3. ☐ In the Comments area of Section G, the local official describes specific corrections to the information in Sections A, B, E and H.

G4. ☐ The following information (Items G5–G11) is provided for community floodplain management purposes.

G5. Permit Number: _____ G6. Date Permit Issued: _____

G7. Date Certificate of Compliance/Occupancy Issued: _____

G8. This permit has been issued for: ☐ New Construction ☐ Substantial Improvement

G9.a. Elevation of as-built lowest floor (including basement) of the building: _____ ☐ feet ☐ meters Datum: _____

G9.b. Elevation of bottom of as-built lowest horizontal structural member: _____ ☐ feet ☐ meters Datum: _____

G10.a. BFE (or depth in Zone AO) of flooding at the building site: _____ ☐ feet ☐ meters Datum: _____

G10.b. Community's minimum elevation (or depth in Zone AO)requirement for the lowest floor or lowest horizontal structural member: _____ ☐ feet ☐ meters Datum: _____

G11. Variance issued? ☐ Yes ☐ No If yes, attach documentation and describe in the Comments area.

The local official who provides information in Section G must sign here. *I have completed the information in Section G and certify that it is correct to the best of my knowledge. If applicable, I have also provided specific corrections in the Comments area of this section.*

Local Official's Name: _____ Title: _____

NFIP Community Name: _____

Telephone: Ext.: _____ Email: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Signature: _____ Date: _____

Comments (including type of equipment and location, per C2.e; description of any attachments; and corrections to specific information in Sections A, B, D, E, or H):

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.:	FOR INSURANCE COMPANY USE
PO BOX 1345	Policy Number:
City: *Springfield* State: *OR* ZIP Code: *97477*	Company NAIC Number:

SECTION H – BUILDING'S FIRST FLOOR HEIGHT INFORMATION FOR ALL ZONES (SURVEY NOT REQUIRED) (FOR INSURANCE PURPOSES ONLY)

The property owner, owner's authorized representative, or local floodplain management official may complete Section H for all flood zones to determine the building's first floor height for insurance purposes. Sections A, B, and I must also be completed. Enter heights to the nearest tenth of a foot (nearest tenth of a meter in Puerto Rico). ***Reference the Foundation Type Diagrams (at the end of Section H Instructions) and the appropriate Building Diagrams (at the end of Section I Instructions) to complete this section.***

H1. Provide the height of the top of the floor (as indicated in Foundation Type Diagrams) above the Lowest Adjacent Grade (LAG):

a) **For Building Diagrams 1A, 1B, 3, and 5–8.** Top of bottom floor (include above-grade floors only for buildings with crawlspaces or enclosure floors) is: _____ ☐ feet ☐ meters ☐ above the LAG

b) **For Building Diagrams 2A, 2B, 4, and 6–9.** Top of next higher floor (i.e., the floor above basement, crawlspace, or enclosure floor) is: _____ ☐ feet ☐ meters ☐ above the LAG

H2. Is **all** Machinery and Equipment servicing the building (as listed in Item H2 instructions) elevated to or above the floor indicated by the H2 arrow (shown in the Foundation Type Diagrams at end of Section H instructions) for the appropriate Building Diagram?

☐ Yes ☐ No

SECTION I – PROPERTY OWNER (OR OWNER'S AUTHORIZED REPRESENTATIVE) CERTIFICATION

The property owner or owner's authorized representative who completes Sections A, B, and H must sign here. *The statements in Sections A, B, and H are correct to the best of my knowledge.* **Note:** If the local floodplain management official completed Section H, they should indicate in Item G2.b and sign Section G.

☐ Check here if attachments are provided (including required photos) and describe each attachment in the Comments area.

Property Owner or Owner's Authorized Representative Name: _____

Address: _____

City: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ Email: _____

Signature: _____ Date: _____

Comments:

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

BUILDING PHOTOGRAPHS

See Instructions for Item A6.

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

Instructions: Insert below at least two and when possible four photographs showing each side of the building (for example, may only be able to take front and back pictures of townhouses/rowhouses). Identify all photographs with the date taken and "Front View," "Rear View," "Right Side View," or "Left Side View." Photographs must show the foundation. When flood openings are present, include at least one close-up photograph of representative flood openings or vents, as indicated in Sections A8 and A9.

Photo One

Photo One Caption:

Clear Photo One

Photo Two

Photo Two Caption:

Clear Photo Two

Form Instructions

ELEVATION CERTIFICATE

IMPORTANT: MUST FOLLOW THE INSTRUCTIONS ON INSTRUCTION PAGES 1-11

BUILDING PHOTOGRAPHS

Continuation Page

Building Street Address (including Apt., Unit, Suite, and/or Bldg. No.) or P.O. Route and Box No.: *PO BOX 1345*

City: *Springfield* State: *OR* ZIP Code: *97477*

FOR INSURANCE COMPANY USE

Policy Number:

Company NAIC Number:

Insert the third and fourth photographs below. Identify all photographs with the date taken and "Front View," "Rear View," "Right Side View," or "Left Side View." When flood openings are present, include at least one close-up photograph of representative flood openings or vents, as indicated in Sections A8 and A9.

Photo Three

Photo Three Caption:

Clear Photo Three

Photo Four

Photo Four Caption:

Clear Photo Four

NOTICE OF COMPLETENESS

Coos County Planning
60 E. Second.
Coquille, OR 97423
http://www.co.coos.or.us/
Phone: 541-396-7770

Monday, January 29, 2024

Outdoor Superstar, LLC
PO Box 1345
Springfield, OR 97477

RE: Completeness Review for HBCU-23-002

Dear Property Owner:

Thank you for submitting an Hearings Body Conditional Use. The first step in the application process is a completeness review. The following items were required to be included in your application or determined prior to the acceptance of the application:

☒ 1. The correct and completed application form was filed. If the proposed use/activity will occur in an identified hazard area the correct reports or certifications have been included.

☒ Applications shall be submitted by the property owner or a purchaser under a recorded land sale contract. "Property owner" means the owner of record, including a contract purchaser. The application shall include the signature of all owners of the property. A legal representative may sign on behalf of an owner upon providing evidence of formal legal authority to sign; a consent form may be accepted.

☒ 2. One original and one exact unbound copy of the application or an electronic copy shall be provided at the time of submittal for all applications;

☒ 3. A detailed Project Proposal was provided;

☒ 4. A detailed parcel map of the subject property illustrating the size and location of existing and proposed uses, structures and roads on an 8½" x 11" paper to scale. Applicable distances must be noted on the parcel map along with slopes. (See example plot map);

☒ 5. Covenants or deed restrictions on the property were provided or were found not to exist.

6. All of the lots or parcels that are currently within the applicant's ownership, co-
☒ ownership or is purchasing which have a common boundary with the subject property on an assessment map were listed on the application;

☒ 7. A copy of the current deed of record has been provided;

☒ 8. All the applicable criteria have been addressed;

☒ 9. The property was created legally;

☒ 10. All development was cited in compliance with the Coos County Zoning and Land Development Ordinance or this application will bring a use or activity into compliance; and

☒ 11. All road, driveway, access, parking plan or traffic impact analysis has been submitted as required by the Coos County Zoning and Land Development Ordinance.

This application has been:

☒ Deemed complete as of the date this letter was sent and the application has been forwarded to all applicable agencies or departments for comment; or

☐ Deemed incomplete due to missing information as shown by the unchecked boxes above. As the applicant for a permit or limited land use it is your responsibility to submit one of the following within 180 days from the date the application was receipted to the Planning Department:

a. All of the missing information;
b. Some of the missing information and written notice from the applicant that no other information will be provided; or
c. Written notice from the applicant that none of the missing information will be provided.

If the application is found to be incomplete and steps a, b or c are not completed within the required timeframe (180 days), then on the 181st day the application will be deemed void. If you submit material by email you are responsible to follow up with staff to ensure that information was received. On the day the department receives one of the options (a. through c.) above is the date your application will be considered complete.

Once your application has been deemed complete staff will continue with the review process. Your application will go through the following steps (checked steps apply to your application):

☒	1.	The first step is requesting comments from any applicable agency or department. Most agencies have 30 days to respond to comments.
☐	2.	If this is a land division Technical Review Committee (TRC) will be scheduled once all comments have been received. Once the TRC has been completed a tentative decision is mailed out approximately six (6) weeks after. The notice of tentative decision will provide for a fifteen (15) day opportunity to appeal. If appealed it will be scheduled for hearing. The decision only becomes final after the final partition plat has been filed.
☒	3.	If this is application requires a hearing, a notice of hearing will be provided 20 days prior to the hearing. Once the hearing is concluded a notice of decision will be mailed out within five to seven days. If this is a Planning Commission decision the notice will provide for an opportunity to appeal (15) fifteen days to the Board of Commissioners. If this is a Board of Commissioners decision there is a twenty-one (21) day appeal period to the Land Use Board of Appeals.
☐	4.	If this is an administrative review (Administrative Conditional Use, Extension, or Variance) a notice of decision with an opportunity to appeal will be mailed out once the review has been completed. Approximately, six weeks after the application has been deemed complete. The notice of decision will provide for a fifteen (15) day opportunity to appeal. If not appealed the decision becomes final. Property line adjustment discrete parcel 12 day opportunity to appeal.
☐	5.	If this is a limited land use notice then a notice requesting comments will be mailed as soon as the application has been deemed complete and then a review and decision will be issued. Approximately, four weeks after the comments time has expired. The notice of decision will provide for a fifteen (15) day opportunity to appeal. If not appealed the decision becomes final.

Except when an applicant requests an extension of the timelines, the governing body of the county or its designee shall take final action on an application for a permit or limited land use decision within 120 (urban zone) days or 150 (rural) days as applicable.

If you have questions about the land use process, please contact planning staff for assistance.

Thank you,

Amy Dibble

Planning Staff
C: File