



ORCA: Oregon Coast Alliance

P.O.Box 5464, Charleston OR 97420

(503) 391-0210

<http://www.oregoncoastalliance.org>

Protecting the Oregon Coast

Sen. Jackie Dingfelder
Destination Resorts Work Group
c/o Committee on Environment and Natural Resource
347 State Capitol
Salem, OR 97310

July 14, 2010

Dear. Sen. Dingfelder,

My name is Cameron La Follette, and I am the Land Use Director for Oregon Coast Alliance (ORCA). We work specifically and only in Oregon's coastal zone, generally from the crest of the Coast Range to the ocean. Our work concentrates on land use matters, which ranges from working with coastal residents to oppose inappropriate development in cities and rural areas to helping and supporting large-scale estuary restoration projects.

ORCA has been learning about destination resorts, as Curry County recently became the only coastal county to complete the required ordinance and mapping for resorts under Goal 8. Now the county is beginning the review process for the tentative master plan for Crook Point Resort, a large resort proposed for land south of the Pistol River.

My understanding is that the Destination Resorts work group is seriously considering a policy shift in DRs (ultimately leading perhaps to legislative recommendations), encouraging small and medium size resorts with greater focus on overnight lodging units rather than subdivisions. I realize the many difficulties that attend the large subdivision-based resorts in central Oregon. Certainly smaller resorts designed specifically for overnight lodging would solve many of those problems.

ORCA's concern about such a model for resorts is that it **may** very likely prove damaging to the coast. Oregon's coast is unique in many ways, both ecologically and culturally. In recognition of this, there are three Goals that apply only to the coast: Goal

16 (Estuarine Resources), Goal 17 (Coastal Shorelands) and Goal 18 (Beaches and Dunes). However, those Goals provide only a first-level requirement for planners in recognition of the coast's uniqueness; they do not create anything close to a protective template for fragile coastal resources. It is generally recognized that ecologically sensitive and important areas are tightly concentrated on the coast, due to the many headlands and coves; small estuaries, bays and marshes; short but undammed rivers with strong salmon runs; dunes, seasonal wetlands and shore pine forests — and many other unique micro-habitats.

In addition, one of the coast's principal assets, apart from its ecological richness, is its scenic variability and rugged beauty. The coast's scenic resources led to two early reports trying to quantify the aesthetic experience, the first one at the dawn of Oregon's planning system. In 1974 the then Oregon Coastal Conservation and Development Commission (OCCDC) requested a report measuring and ranking the coast's visual resources. The result was a report submitted to the 58th Legislature in January of 1975 entitled *Visual Resource Analysis of the Oregon Coastal Zone*, prepared by the landscape architect firm Walker Havens & Erickson. Nineteen years later another report also sought to quantify the aesthetic resources of the coast: *Exceptional Aesthetic Resources Technical Report*, prepared for the Oregon Department of Land Conservation and Development (DLCD) by Jones and Jones in September, 1993. This sustained attention to coastal aesthetics came about because it was recognized early on that the coast's scenery is extraordinary, valuable — and vulnerable to inappropriate development.

About 50% of the coastline in Oregon is protected, mainly by state parks, but also by some federal (i.e., Oregon Dunes National Recreation Area, Nestucca Bay National Wildlife Refuge) and county (i.e., Bastendorff Beach Park in Coos County) designations. One of the prime concerns on the coast is protecting buffers for these protected areas. The refuges and parks contain high ecological and scenic richness. But adjacent to these protected areas are often unprotected lands that are highly valuable to developers *because of* those same amenities. Yet development there would jeopardize the very values protected by public lands. It is important to remember that the adjacent lands almost invariably have the same ecological richness and fragility as their protected neighbors. Many of the most sensitive and valuable habitats are on private lands, which are not protected at all. Much of the coastal zone not in public ownership is zoned for one or another kind of rural development, most frequently residential.

The proposed Crook Point Resort in Curry County is a case in point. The more than 200 acres proposed for the resort are adjacent to and contiguous with both the Crook Point Unit of Oregon Islands National Wildlife Refuge and Pistol River State Park. Both protected areas are wild, with few humans, no development and (in the case of the NWR) restricted access. The land proposed for the resort are also uninhabited, and as ecologically rich as the adjacent public lands. A resort in this location, however focused

on overnight accommodation, will have major effects on one of the loveliest, wildest, and most ecologically fragile areas on the whole coast.

In addition, because very different land uses are often right next to one another on the coast, even a small resort can impact many more people and environments than might be the case elsewhere. A possible resort-type development adjacent to Ecola State Park in Clatsop County, for example, would not only heavily impact that beloved and popular state park, but also be very close to, or even adjacent to, the urban growth boundary of Cannon Beach. A resort there would greatly complicate Cannon Beach's already precarious summer traffic situation, and draw yet more visitors to a seasonally crowded area without sufficient infrastructure to handle them. It would also change the character of a small town in ways its residents might not appreciate, towards larger-scale tourism accommodation.

A longstanding problem on the coast is that the highest-value real estate, whether in incorporated cities or in rural areas, is property with an "ocean view," the closer to the beach the better. However, those same areas are often the ones with the highest geological hazard problems due to flooding, fragile soils, slope instability, high erosion potential and damaging stormwater runoff during the coast's frequent heavy rains that occur during much of the year. There are constant battles on the coast to prevent or mitigate development that seeks to build too close to the amenities of beach, dune and ocean without accounting the costs, and real dangers, of such development. Sebastian Shores in Gold Beach, the Shelter Cove development in the Florence area and The Capes in Tillamook County near Oceanside are examples of developments that have had, and continue to have, coastal erosion problems necessitating expensive fixes. County development codes generally do not incorporate geological information from DOGAMI, and local ordinances are often insufficiently strict in their protective language. Political and market pressures are high to allow development in such unstable areas.

When inappropriate development occurs, both the unsuspecting property buyers and the ecology of the area are the losers. Coastal resorts (such as Crook Point) are no different than other developments; they are shaped by the same market forces, with a strong tendency to site, and build, as close to the ocean as possible. Problems from erosion, storms and wave undercutting come later, after people have moved in, as happened at The Capes and Sebastian Shores. There are many hidden costs to local governments in these situations: lost revenue, bad publicity, disgruntled buyers and, potentially, upfront costs to fix problems and / or legal liability for having inappropriately permitted costly development in geologically unstable and vulnerable areas.

I will add that, by and large, coastal counties are poor, especially on the south coast. Resorts have every potential to suck out resources the county would otherwise use for much-needed infrastructure repairs or upgrades, and focus them entirely on the resort. This is something coastal counties can ill afford. The costs to local governments are great

of locating large scale resorts (like the Crook Point Resort) in rural areas without urban-level infrastructure.

There are economic benefits to tourism, especially on the coast, where tourism is a central part of the economy. But there are many kinds of tourism, and they must be properly managed to be beneficial to coastal residents. How and where to accommodate tourists is a key decision. Rural resorts is only one way; and such resorts especially must be balanced against unmet infrastructure and capital needs and other unmitigated costs to the County taxpayers. Even if Crook Point and other potential resorts paid fully for their traffic and other infrastructure, they may well be shifting resources from capital improvements in the County already identified and needed — but inessential to the resort, and so therefore unlikely to be built. This and similar problems need to be identified and studied before other resorts are sited on the coast.

Since the DR work group may consider working on a revised set of siting criteria for resorts, I would respectfully ask that these considerations from the coast be taken into account. Currently, the coast has only three resorts, none of which were developed under Goal 8: Salishan, Otter Crest and Bandon Dunes. Bandon Dunes, the most recent, was an “exceptions” resort and did not utilize Goal 8. The other two were largely developed before the Goal 8 process was in place. Perhaps the DR work group would consider discussing criteria that protect the unique considerations of the coast, such as: (1) requiring that a DR be at least three miles from an NWR, State Park or other designated and protected area; (2) a DR must be at least two miles from the UGB of any incorporated city; (3) a DR must be at least two miles from an estuary, and one mile from any beach, dune or coastal shorelands area.

Many thanks for your consideration of this letter and also for listening to a coastal perspective in the important work of reviewing Destination Resort policy and practice.

Sincerely,

/s/ Cameron La Follette

Cameron La Follette
Land Use Director