

October 19, 2023
Nancy Noble Post

Additional testimony regarding the Gravel Point Application

After attending the hearings and reading all of the written testimony it appears to me that there are 5 main areas of public concern.

The increased traffic:

Because the impact of the traffic has never been fully understood or explained, I asked my husband Mark, a Civil Engineer to help me unpack the traffic study. According to the Parametrix traffic engineer, hired by the G.P team, the Resort will generate approximately 111 more car trips along Beach Loop, at the access point to the resort, at peak hours. This is twice as many trips as there are currently. As of now in 2023 there is an estimated 95 cars trips during peak hours. It is estimated that in 2026 if G.P. is not built there will be an additional 9 car trips for a total of 104 trips during peak hours. In this same location. If the Resort is built it is estimated that there will be 111 more car trips along this stretch during peak hours. That is twice as many car trips as there are currently. Twice as many. Some of these trips will be from the south along Beach Loop and some of the trips will be from the north along Beach Loop. Access to Beach Loop from the South is either from Seabird off of Hwy101 or from the Bradley Lake turn off access point approximately 2 miles south of Seabird. From the north, access to Beach Loop off of Hwy 101 is either down 11th St. through City Park or off of 101 through Old Town. There is no mention in the report of how many cars will use Carter to access the Resort from its eastern entrance off of Seabird. Face Rock Dr was often mentioned as a potential access point to the Resort but it too requires the same number of Beach Loop trips. Currently Face Rock Dr dead ends in gorse just 1,700 feet from its Beach Loop access point, it has no Hwy 101 access.

Applicant's Rebuttal:

Transportation Goal 12

E. The City will require limited or shared access points along arterials and collectors as is necessary to preserve traffic-carrying capacity.

Land use changes which result in the generation of 300 or more new vehicle trips per day will be required to provide a traffic impact study. The results of the study will be used by the City and ODOT to determine what traffic mitigation measures will be required.

The proposed development does not result in a generation of 300 or more new vehicle trips per day; however, the developer chose to conduct a traffic study for the Planning Commission to review. The study and results are based on the Industry Standard and relied on information from ODOT and the City of Bandon. The total new trips per day do not warrant a second access point, new street connectivity, a four way stop or a traffic signal. ODOT has reiterated that they will not allow a signal at Seabird and Hwy 101.

The proposal is for a main access point off of Beach Loop. The City of Bandon required that Carter be extended to Beach Loop to meet their own agenda- loop utilities and provide emergency access and evacuation routes. The City can “block” the street opening similar to Madison Ave SW and Ohio Ave SE which accomplishes that desired outcome. That would restrict vehicular traffic from Gravel Point and Beach Loop.

There are ways to direct traffic, restrict traffic and provide pedestrian access without opening a street to through traffic. The LOS study showed that Beach Loop and Seabird could handle the expected traffic count for the proposed project. There is no reason to open Carter Street to through traffic.

The increased load on city services:

There is considerable conflicting information about this issue. The City of Bandon regularly reminds us that our wastewater system is in need of repair and that our water storage capacity is inadequate and needs updating. Additionally, the roads are substandard and there is a dearth of law enforcement. Recently, the outgoing City manager thanked the City employees for their ability to do more with less. Yet the City has assured the Gravel Point team that they can meet the needs of their project. Gravel Point has promised to pay their fair share through SDCs and has also promised the City a large increase in TOTs to help with budget shortfalls. SDCs are a calculated payment, TOTs are dependent on occupancy. The assumption here is that if they build it, they will come. Perhaps not.

Applicant's Rebuttal: The Sewer Master Plan was prepared and adopted in 2002. The Plan assumed a growth rate that would have been 4241 people in 2022. The 2020 census reported 3321 people. No upsizing of the Beach Loop Drive line was recommended by the plan to serve this area, so it is found that the existing sanitary sewer lines are adequately sized to accommodate the Gravel Point development.

The City of Bandon Water Master Plan outlines the capacity of the existing water system to serve the residential and commercial users located in both the City limits and the urban growth boundary. It was found in June 2022 that there is adequate water for the estimated and expected growth through the year 2041.

System Development Charges will be paid along with Developer funded road improvements. Clear and Objective standards for approving a conditional use permit cannot rely on worry, concern or projections about what will happen in the future. The criteria have been met.

The disruption during construction:

There is a lot of concern about the traffic, the noise and the general dirt and

debris related to the construction process. This project could take as long as two years to build with daily disruption to the peace and quiet of our lives.

Applicant's Rebuttal: All development has noise, dirt and activity associated with the scope of work. Two years is the average timeframe to build a new dwelling in Bandon, so there is no new or predicted upset in the vicinity

The actual scope of the Gravel Point project:

There is some confusion about what is going to be built on the 26 acre site addressed in the Gravel Point application and what might be built in the future on the adjoining 60 acres in the county. It has been confirmed that the Gravel Point project does not include a pool, or a reservoir and it is still to be determined what services will be available to the public in terms of restaurants and a wellness center.

Applicant's Rebuttal: The applicant made the proposal very clear in the narrative, application, findings and on the plans. The review is specific to the Conditional Use for Hotel, Motel, Spa and Restaurant uses along with the proposal as it meets the intention of the Commercial Design Standards and Conditions for requiring design features that minimize environmental impacts.

The applicant made it known on several occasions that the general public would benefit from all of the site amenities. It is up to the public if they want to enjoy the trail system, have dinner at the restaurant or visit the spa.

A commitment to honoring the guiding principles:

Currently there is a significant disconnect between the current site plan and the guiding principles stated in the application. I am hoping that the stated principles are not just rhetoric, but in fact will be realized if the project is one day completed.

“Restore the Oregon Coast”

“Concentrate and touch lightly”

“Be good neighbors”

“Gracious Hospitality “

And most importantly for those of us along the perimeter,

“Buildings should be good neighbors”

Thank you,
Nancy Noble Post
October 19, 2023

October 19, 2023
Mary Woolley

Hi Dana,

Please enter into the record for the planning commission review the following:

Dear Bandon Planning Commission and Planning Department:

October 19, 2023, 12:23 pm

We request that you put a condition on the approval of the Gravel Point development that Carter cannot be extended to Beach Loop. Approving this will violate the existing code.

Specifically, the following applies:

Bandon Municipal Code 17.12.010 states: "The purpose of the R-1 zone is to provide sufficient and desirable space in appropriate locations for residential uses and to protect these areas against congestion, nuisance and objectionable uses which reduce the quality and value of these areas for residential purposes. Having an entrance and traffic from a large commercial development such as Gravel Point does not provide the protection of our Zoning as per the above. Eliminating this entrance into Gravel Point from Carter will eliminate the need for the 14 ft. long sign on Carter, uplighting and the three proposed street lights in our dark night sky residential development. Our safety, security, and property values will be compromised by the commercial traffic, noise, and night light.

The argument that the development is not in our zone does not apply because the road extension violates the R1 code by funneling traffic into our residential area. In addition the argument that you have to extend a platted road is incorrect because there are a very large number of platted roads in Bandon which are dead end and not extended.

Applicant's Rebuttal: The R-1 Zone has several conditional uses listed that could result in the same type of issues as listed below. Unfortunately, the Planning Commission is not reviewing whether the R-1, or the CD-1, Zone have an appropriate list of uses.

17.12.030 Conditional uses.

In the R-1 zone, the following uses and their accessory uses may be allowed in accordance with Chapter 16.12 and the provisions of this title:

A. Boarding or rooming house;

B. Multiple-family dwelling;

C. Church; Bandon Municipal Code, Title 17 Page 26 of 163

D. Community club or building;

E. Schools, including nursery or day care center;

F. Public park and recreation facility;

G. Community service, including governmental, emergency service, or non-profit offices;

H. Automobile Parking, Public Off-Street Parking;

I. Nursing, convalescent or retirement home;

J. Clinic or office, outpatient only
K. Medical Center (public);
L. Urgent Care/Pharmacy (retail);
M. Residential Care Facility;

I know the developer wants this road extension for construction and truck uses, but do you really want to create a situation which violates our existing code?

Applicant's Rebuttal: The City of Bandon required that Carter be extended to Beach Loop to meet their own agenda- loop utilities and provide emergency access and evacuation routes. The City can "block" the street opening similar to Madison Ave SW and Ohio Ave SE which accomplishes that desired outcome. That would restrict vehicular traffic from Gravel Point and Beach Loop. The developer never proposed the use of the residential streets for construction activities.

Thank you very much for all your time and energy on this exciting project.

Best Regards,

Mary J. Woolley, John Mitchell, Cathleen Mills, Edith and George Schwirian (We live on either Lincoln or Carter.)

PS: Dana, Would you please confirm that this is given to the commissioners prior to the deadline? Thanks so very much for all your hard work on this.

October 19, 2023

Nancy Bailey & Bruce Williams

Thank you for an additional opportunity to comment. Following are our statements and recommendations regarding the Gravel Point Resort:

- Developer should be required to seriously explore a direct route to Highway 101 via Edna or Face Rock Drive and determine a more accurate projected cost of such a route.

Applicant's Rebuttal:

Bandon Transportation System Plan

Page 353 Development of Face Rock Drive-20th Street as a collector will be done as the South Bandon interior develops over the next twenty years.

The interior of South Bandon, aka the Donut Hole, has yet to be developed to an extent that a new street connecting Beach Loop to Hwy 101 is warranted. The County residents have commented on the record that they are opposed to a new street. Additionally, the City of Bandon does not want to annex South Bandon and take on the expense of infrastructure. The Planning Commission is not the governing body for annexation or street openings or extensions; therefore, a requirement for a new street is outside of the purview of the Conditional Use Permit request.

- Because this resort will directly result in increased traffic volume, including heavy construction vehicles for several years, the developer should assist in financing the cost of a traffic signal or roundabout at the Highway 101 and Seabird Drive intersection. This intersection is already dangerous and increased traffic will make it even more so.

Applicant's Rebuttal: ODOT has stated on several occasions that a traffic signal at this intersection would not be allowed.

- In the CUP the City should restrict all construction vehicles to a specified route, i.e., Hwy 101 to Seabird to Beach Loop, to avoid the R-1 Ocean Trails neighborhood (Lincoln, Spinnaker, Carter).

Applicant's Rebuttal: The City of Bandon required that Carter be extended to Beach Loop to meet their own agenda- loop utilities and provide emergency access and evacuation routes. The City can "block" the street opening similar to Madison Ave SW and Ohio Ave SE which accomplishes that desired outcome. That would restrict vehicular traffic from Gravel Point and Beach Loop. The developer never proposed the use of the residential streets for construction activities.

- The developer should be required to coordinate with the City to develop an evacuation plan to ensure the safety of both the residents and the visitors.

Applicant's Rebuttal: The City of Bandon has an evacuation plan for residents and visitors. Gravel Point will be required to post the evacuation route as is required for all transient lodging in Bandon.

- The developer should be required to put in sidewalks along Beach Loop where their resort will be located.

Applicant's Rebuttal: As discussed in public hearings, the developer does not have an issue with providing sidewalks or pedestrian crossings. The question is- what purpose of a partially built sidewalk? The City of Bandon can form a Local Improvement District to finance the entire sidewalk system from Seabird to 7th Street at which time the owner would contribute their share of the cost.

- The developer should furnish and make public the total budgeted cost of the project.

Applicant's Rebuttal: The developer is not a public entity that is required to post project costs, budgets or send the project to bid for the work.

Thank you again for your consideration of the area residents' concerns.

Sincerely,
Nancy Bailey
Bruce Williams
601 Seabird Drive SW

October 19, 2023
Leslie and Don Suva

It is our continuing and urgent request that the Planning Commission exercise due diligence with respect to the Gravel Point project which will have an irreversible and enduring impact on Bandon as a whole, not just those of us in the immediate strike zone.

A request to halt this development project is reasonable. We implore you to vigorously represent the interests of the tax-paying residents of Bandon over those of out-of-state developers.

Applicant's Rebuttal: All property owners in Bandon pay the same amount of property tax. The proposed project will pay an additional tax that residents do not pay, but definitely benefit from called Transient Occupancy Tax. Without TOT, the City does not have the funding for their Police force.

Though developer Brett Perkins boasts of being a "local boy" (Coos County), he left many years ago, has not resided in Bandon, yet shows up on the scene seeking to burden us with his insufficiently reasoned and unwanted creation. Prior to going forward on any project, infrastructure (Beach Loop Road for one) must be assessed, upgraded/enhanced.

Beach Loop Road is an accident waiting to happen.

PERK must show that it is vested in the community of Bandon. Do something for residents who actually live and pay taxes here rather than developing a luxury resort for affluent outsiders and guests. Bear in mind that the City of Bandon only benefits from TOT when rooms are sold and occupied. When resort goers depart, Gravel Point is still here, whether occupied or not.

Applicant's Rebuttal: The general public may not be aware of the efforts taken to be involved in this community, though we have made those items public through the hearings process. The Bandon Swimming Pool has received a great boost in hope for their project coming to fruition because PERK has incorporated their plans into the privately owned acreage by City Park. Additionally, a proposal for Workforce Housing was submitted to the City, yet was not chosen. A portion of the privately owned property by City Park has been set aside for workforce housing as well.

We are hopeful of peaceably living out our lives in quiet, appealing Bandon. Thank you for resolving this matter, for the people of Bandon.

Leslie and Don Suva

October 19, 2023
Bruce Spencer

I travel Beach Loop Drive often. Mostly between Edison Ave and Seabird, but also the entire loop south back to 101. I travel by car, by bike, and by walking, the walking is sometimes with my dogs. Since I became aware of this project and started to get an understanding of its breadth and size and potential implications, I have taken additional notice of some of the unique characteristics in my neighborhood. I'm guessing many of us have experienced the times people are walking north or south on one side of Beach Loop at the same time bike riders are traveling on the opposite side, all enjoying the outdoors, the scenery, each other. Vehicles passing between them need to use extra care. The need for extra care is even more pronounced when another vehicle is approaching in the opposite direction. In times like these, when I am the driver of a vehicle on Beach Loop, I am blessed that I recognize how Beach Loop is utilized, and that I am in a position like a lot of us in this city to appreciate, and to be patient with, and by doing so to promote, this unique quality.

Obviously this uniqueness is not limited to Beach Loop, or our town for that matter. Similar uniqueness is found all around Bandon, and I understand plans are always being considered to retain and enhance what character we have. My point is, whatever gain is to be obtained, no matter the project, needs to be weighed against not only the tangible costs, but the intangible costs, the opportunity costs of doing something else, the goodwill of the community, the unique qualities and situations we all currently share. I accept and recognize change is inevitable, but it still must be managed to our benefit when we can do so. And while change may be an intangible, there are still several sections in the city's code that tangibly address how change should be managed.

I have addressed some of them in previous testimony, but among them, for the particular instance above, Section 17.04.020(G) to avoid congestion, (R) to provide for orderly and efficient growth of the city, and (S) to promote public health, safety, convenience, and general welfare. I dwell particularly on that last one. I don't think the impacts from this development are going to include encouraging people to increase walking and biking in this beautiful area, regardless of what the applicant argues. Nor do I think it is going to positively impact the safety of those people. And the construction and subsequent travel over our roadways certainly won't be convenient for anyone around the site or anywhere in the vicinity.

Applicant's Rebuttal: The proposal has met the criteria listed in the Bandon Municipal Code and Comprehensive Plan. The City of Bandon will need to review their Codes at a later date to consider what changes they can make to better control congestion which is unrelated to this proposal.

Part of my opinion about this current project involves the above. While this is likely an issue for another time and place, another part of my opinion is that maybe the city code needs addressing to possibly accommodate for some of the concerns and objections that have been brought up during this process. For example, I understand the Pre-Planning for Large Sites I

addressed in previous testimonies may not be applicable due to its chapter placement. But the development team has used the term 'spirit of the law' several times in their arguments. Why would the spirit of the law not say to us shouldn't we be looking at their plans in entirety to allow us to properly gauge all the impacts, and on all of the surrounding communities of those 90 acres, regardless of addresses being within city limits, and to properly plan for and strategize for things like construction impacts and traffic flows and city services and so on, and do so before an irreversible decision is made? They've got 90 acres, it only makes sense to me. But again, this is just part of my opinion, and whatever my opinion, I understand and appreciate it is just one of many.

My prior testimonies were probably in a different vein than this, but I wanted to share these thoughts while I had the opportunity. However this turns out, I have faith in the Planning Department and Director, as well as the City Council and Mayor, and everyone else involved in this project working on behalf of our city. I appreciate their responsibilities, efforts, and considerations to the concerns of its citizens, and of course their additional consideration in this particular upcoming vote November 2nd.

Thank You, Bruce Sencer

October 18, 2023
Theresa Westover

Hello,

My name is Theresa Westover, I live at 2976 Lincoln Ave SW in Bandon. I have concerns about the Gravel Point development. I have listened on zoom to the recent public meetings Planning has provided and follow the local discussions on social media.

While I am very impressed with the thoughtful designs and vision of the developers, I cannot support this development. It is too large and intrusive for the location. I am especially concerned about the increased traffic and the available traffic routing that is proposed. Routing both construction vehicles and, later, tourists and delivery trucks through residential, subpar streets and Beach Loop is a threat to both the city's and neighborhoods' quality of life and the viability of local roads. It will be damaging and highly intrusive. I have heard others say that it will not be any more intrusive than the residential development that was planned by the city for the proposed site. However, I disagree. We are accustomed to residential development in our neighborhood - it is incremental and while construction noise is bothersome it does not last for long and the residential contractors' equipment is far smaller and lighter than is true of major developers' equipment. Further, the resort build will go on far longer and louder than residential projects. Additionally, it is much easier to integrate residential growth because it occurs at a slower pace, allowing both existing residents and the city time to adjust and respond to increased traffic and population.

Applicant's Rebuttal: The proposal is for a main access point off of Beach Loop. The City of Bandon required that Carter be extended to Beach Loop to meet their own agenda- loop utilities and provide emergency access and evacuation routes. The City can "block" the street opening similar to Madison Ave SW and Ohio Ave SE which accomplishes that desired outcome. That would restrict vehicular traffic from Gravel Point and Beach Loop.

There are ways to direct traffic, restrict traffic and provide pedestrian access without opening a street to through traffic. The LOS study showed that Beach Loop and Seabird could handle the expected traffic count for the proposed project. There is no reason to open Carter Street to through traffic.

Page 138 of The Comprehensive Plan reads, *"Future development in the CD-1 and CD-2 zones will be 90% residential and 10% commercial/other. This 10% allotment is made because both controlled development zones allow some commercial uses conditionally."*

Page 139 of The Plan reads, *"In addition to the acreage in commercial zones, another 15 acres may be considered available in the Controlled Development (CD) zones of the Jetty and Beach Loop Road areas. The City estimates that 10% of the buildable land in the CD zones will go to commercial uses. Such uses will likely be tourism related."*

The proposed plan is in accordance with the Plan and the expected ratio of residential to commercial development. There are 5 commercial establishments in the CD-1 zone- Table Rock, Sunset, Lord Bennett's, Best Western, and Windermere. Those businesses comprise less than 10% of the land inventory and overall uses. Incompatibility would be for a proposed use in EXCESS of the desired use ratio.

Second, I am concerned about the potential large increase in tourist visitation for the wider resources and attractiveness of the city in general. As it stands, there are so many tourists during the summer, in particular, that it is very difficult to navigate through Bandon and nearly impossible to park in Old Town, or at the parking areas off Beach Loop, such as Face Rock. I have lived in a couple of similar cities - Santa Cruz, Ca and Boulder, Co. In both locations there was a tipping point where increased growth eventually destroyed the character of both cities and put enormous stress on the very natural resources that attract vacationers. Further, both cities became so crowded and expensive that no one but the very wealthy can afford to live there. I realize much of the City of Bandon's income depends on tourists. However, it is important to carefully weigh the non-financial costs of this large resort in a location that will stress our infrastructure, our beautiful beaches and the creatures that depend on the natural resources, and the livability for full time residents. If we have difficulties with housing for working people now, it will only get worse with a large new resort. I know the developers intend to build housing for employees, but it does not appear from the hearings that it is a "sure thing" or that it will come anywhere close to accommodating the number of people who will be working there.

Applicant's Rebuttal: The Comprehensive Plan states the importance of more tourist facilities and recreational opportunities which our local community relies on. Overnight accommodations not only pay TOT, but the visitors support all of our local businesses.

The existing local hotels and restaurants have huge problems finding and keeping workers; where are all the housekeepers, wait staff, clerks, etc. of this new development going to come from? Where are they going to live? I have been impressed since I moved here with the transparency and hard work of City employees. While I am against this particular development, I do appreciate the work that Planning does and have been impressed with the caliber of the staff and council during the recent hearings. Believe me, I have experienced much, much less professional and thoughtful local government actions in other places. Thank you for encouraging input from residents and for your clear explanations during the hearings. Yes, Bandon will and should grow, let's just be thoughtful about how and where it grows and what the unintended consequences might be.

Respectfully,
Theresa Westover

October 19, 2023

Jean & Honani Polequaptewa

The residential area bordering the resort on the south side including Carter Street SW and portions of Lincoln Avenue and Spinnaker Drive are located in the R-1 Zone. It is apparent that an entrance off of Carter into the Gravel Point Resort would not be in accordance with the Title 17, Purpose for R-1. Below is an excerpt from the city's zoning regulations.

Title 17

Chapter 17.12.010 Purpose

"The purpose of the R-1 zone is to provide sufficient and desirable space in appropriate locations for residential uses and to protect these areas against congestion, nuisance and objectionable uses which reduce the quality and value of these areas for residential purposes."

We believe the resort entrance on Carter Street SW would create excessive road congestion and interfere with the Ocean Trails residents quality of life. The increased traffic that would be created from lodging guests would not be in compliance with the Purpose of the R-1 Zone. This further supports reasons for not allowing an entrance to Gravel Point on Carter Street SW.

We feel that a more viable solution would be to create an access to the resort directly off of HWY 101.

Applicant's Rebuttal: The R-1 Zone has several conditional uses listed that could result in the same type of issues as listed below. Unfortunately, the Planning Commission is not reviewing whether the R-1, or the CD-1, Zone have an appropriate list of uses.

17.12.030 Conditional uses.

In the R-1 zone, the following uses and their accessory uses may be allowed in accordance with Chapter 16.12 and the provisions of this title:

A. Boarding or rooming house;

B. Multiple-family dwelling;

C. Church; Bandon Municipal Code, Title 17 Page 26 of 163

D. Community club or building;

E. Schools, including nursery or day care center;

F. Public park and recreation facility;

G. Community service, including governmental, emergency service, or non-profit offices;

H. Automobile Parking, Public Off-Street Parking;

I. Nursing, convalescent or retirement home;

J. Clinic or office, outpatient only

K. Medical Center (public);

L. Urgent Care/Pharmacy (retail);

M. Residential Care Facility;

Applicant's Rebuttal: The City of Bandon required that Carter be extended to Beach Loop to meet their own agenda- loop utilities and provide emergency access and evacuation routes. The City can "block" the street opening similar to Madison Ave SW and Ohio Ave SE which accomplishes that desired outcome. That would restrict vehicular traffic from Gravel Point and Beach Loop. The developer never proposed the use of the residential streets for construction activities.

Bandon Transportation System Plan

Page 353 Development of Face Rock Drive-20th Street as a collector will be done as the South Bandon interior develops over the next twenty years.

The interior of South Bandon, aka the Donut Hole, has yet to be developed to an extent that a new street connecting Beach Loop to Hwy 101 is warranted. The County residents have commented on the record that they are opposed to a new street. Additionally, the City of Bandon does not want to annex South Bandon and take on the expense of infrastructure. The Planning Commission is not the governing body for annexation or street openings or extensions; therefore, a requirement for a new street is outside of the purview of the Conditional Use Permit request.

October 18, 2023
Bob Schroeter

The following are some additional comments in regards to the Geotechnical report for the Gravel Point Resort development.

1). On page 9 of the report under 6.2.8 Tsunami and Seiche it states that the “project site is located approximately 80 miles inland and is therefore not subject to inundation from a tsunami”. According to the Oregon tsunami mapping the project site (drawn in red on map below) is within the local tsunami zone and is less than 1/4 mile from the Pacific Ocean (even during the last Ice Age the project site would have been located only 25 miles inland from the Pacific Ocean - so for the project site to be located inland 80 miles maybe the Geotechnical report writer must referring to a different geologic time period such as the time of the dinosaurs or before then).

Applicant’s Rebuttal: This is obviously a typo on the report, and the subject site is clearly located less than 80 miles from the ocean.

2.) In figure 2 - the Site Plan with Exploration Locations on page 46 it appears the exploration locations are overlayed on a site plan that is unrelated to the actual proposed Gravel Point resort developed that has been submitted. The site plan on the exploration locations map shows a development containing 54 houses, 9 cottages, a clubhouse and golf practice area, a hotel with pool and terrace and a completely different road system layout. Where the hotel with pool and terrace are shown is where the Gravel Point resort restaurant and bar were proposed to be located. It seems like it might be more appropriate for the Geotechnical report to show the actual proposed site plan in relation to the exploration locations and not some unrelated development.

Applicant’s Rebuttal: The report is specific to the subject site and is considered valid by the State of Oregon. Previous proposals may differ from what has been submitted for review; however, a geological assessment is always site specific regardless of what is proposed.

3). In figure 2 - the Site Plan with Exploration Locations on page 46 there are 5 Boring hole locations shown on the map (B1-4 and B6). Was there not a B5 boring hole? If there was a B5 boring hole is there a reason it wasn’t included on the map? In the data for the Boring holes in Appendix A, there is only data listed for B1-4 boring holes. Is there a reason why the data for Boring holes B5 and B6 not included in the report data?

Applicant’s Rebuttal: This is not something the applicant can answer without speaking to the geologist.

4). In figure 2 - the Site Plan with Exploration Locations and in Appendix C (the Permeability testing results) the map shows and data contains information for P1-5 and P8-11. Was there

not P6 and P7? If there was a P6 and P7, was there a reason why it wasn't included on the map and in the results data?

Applicant's Rebuttal: This is not something the applicant can answer without speaking to the geologist.

5). In the Geotechnical report it is mentioned that the ground water comes within 2 feet of the surface in the eastern portion of the project site. A number of the Test Pit logs show the soil to be moist even when the pits and bore holes were dug during the driest part of the year (August and September, 2022). The report mentions in order to build in those areas the the top 2 feet of organic material would need to be removed down to the native soil for the building footings. Because of the high water table the report also mentions that the site would need to be dewatered (page 20 and 21 in the report) by installing sump pumps to keep the ground water level below the level of the building footings.

It seems the need to dewater the site in order to build conflicts with the stated goal of the Gravel Point development to enhance the areas wetlands on the site as it might hard to maintain the wetlands if one is pumping ground water out of the site and lowering the water table in the area.

Applicant's Rebuttal: Groundwater and wetlands are not the same and carry different connotations in development. All properties in Bandon have a groundwater level which varies per site. 24" is not considered especially shallow for coastal properties.

Sincerely,
Bob Schroeter