



IN REPLY REFER TO:

# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

### Oregon Coast National Wildlife Refuge Complex

South Coast Office  
P.O. Box 99  
83673 North Bank Lane  
Bandon, Oregon 97411  
(541)347-1470

March 22, 2012

Bandon Planning Commission  
City of Bandon  
P.O. Box 67  
Bandon, Oregon 97411

Re: Bandon Planning Commission/Ordinance No. 1994

The U.S. Fish and Wildlife Service's Oregon Coast National Wildlife Refuge Complex is in full support of proposed adoption of Ordinance Number 1994 concerning Outdoor Lighting. This ordinance meets the needs of numerous City of Bandon and U.S. Fish and Wildlife Service plans and recommendations by helping protect and conserve fish and wildlife and the wilderness characteristics of Oregon Islands National Wildlife Refuge (NWR). The implementation of the ordinance will contribute to the co-existence of seabirds, marine mammals and other species with the development associated with the City of Bandon. Light intrusion has been well documented to have major negative effects on wildlife during their breeding and migration activities. Additionally, light pollution adversely affects the wilderness characteristics and values associated with naturalness and solitude of Oregon Islands NWR's off-shore rocks, reefs, islands and ocean resources.

The reduction of extraneous light in the night sky and on the near shore rocks, reefs and islands within the City of Bandon, as proposed in this ordinance, is consistent with many objectives of the Bandon City Comprehensive Plan (Plan; updated March 1, 2011). Below please find excerpts from the Plan concerning the City's Policies and Implementation within Open Space; Scenic; Historic and Natural Resources; and Scenic Resources:

#### **Policy 7:**

The City shall coordinate and cooperate with federal, state, and local agencies in order to maintain access to scenic resources and ensure high quality visual experiences for the public.

#### **SPECIAL POLICIES**

2. The Coquille Point Wildlife Refuge (Oregon Islands): When property within 100 feet of the Refuge boundary is proposed for development, the applicant shall demonstrate that the proposal will have no adverse impact on the function of the Refuge. This shall be accomplished by supplying detailed plans that include proposed landscaping and vegetation, shielded exterior lighting, and noise minimization. In addition, the applicant shall demonstrate how the proposal enhances an identified scenic resource.

## **Coastal Shorelands, Statewide Planning Goal 17:**

The City shall strive to conserve, protect and, where appropriate, develop or restore the resources and benefits of the coastal shorelands within its jurisdiction, recognizing their value for the protection and maintenance of water quality, fish and wildlife habitat, water-dependent uses, economic resources, recreation and aesthetics.

## **Protection Of Major Marshes And Significant Wildlife Habitats In Coastal Shorelands Policy M:**

The City shall protect major marshes and significant wildlife habitat located within the Coquille River Coastal Shorelands Boundary. Uses in these areas shall be consistent with the area's natural values.

This Policy recognizes that special protective consideration must be given to key resources in coastal shorelands over and above the protection afforded such resources elsewhere in this Plan.

## **Ocean Resources (Adopted by Ordinance 1472 January 22, 2002):**

### **POLICIES**

1. The City shall strive to protect and enhance Ocean Resources.
2. The City recognizes the important influence the ocean has on the economic, social, and environmental characteristics of Bandon, and will cooperate with all jurisdictions to maintain the quality of ocean resources.

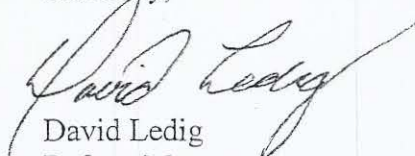
### **IMPLEMENTATION MEASURES**

1. Actions which would affect the nearshore ocean shall be based upon a sound understanding of the resources and potential impacts.
2. The City will coordinate with federal, state, and local agencies to ensure that actions avoid or minimize impacts of the nearshore ocean.

The City of Bandon's Comprehensive Plan complements many of the goals, objectives and strategies documented in the Comprehensive Conservation Plan and Wilderness Stewardship Plan for Oregon Islands National Wildlife Refuge (2009). Both of these documents advocate cooperation around common interests of the City of Bandon and the National Wildlife Refuge. The proposed ordinance is a clear example of this cooperative effort.

In summary, the U.S. Fish and Wildlife Service is supportive of the City of Bandon adopting this proactive ordinance (No. 1194) to help conserve the wildlife and wilderness values within and adjacent to the City of Bandon.

Sincerely,



David Ledig  
Refuge Manager