

Summary of public comments on Bandon Exchange and Grouse Mountain Acquisition

Oregon State Parks and Recreation Commission



Nature
HISTORY
Discovery

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Comments collected through December 6, 2013

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Comments on Bandon Exchange and Grouse Mountain Acquisition

Property: All

Type of comment: Con

Commenter name: Oregon Coast Alliance

Comment: (#113) Loss of farmland and wetlands is not significant public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. Wetlands are protected by law. The exchange provides a net gain in wetland area under public ownership. Current agricultural uses on Grant Co. property will continue for the foreseeable future. There will be no loss of farmlands or wetlands under this proposal.

Commenter name: Linda Tarr

Comment: (#98) Commission should consider the larger context, legacy of natural wild places, which can't be measured in dollars

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Craig Herman

Comment: (#57) Exchange is not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Chris Labbe

Comment: (#69) The proposal does not represent overwhelming public benefit and harms rural communities

Response: The department does not agree. The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. This claim is debatable, and since there is no information supporting this claim, the department does not agree there is such harm.

Commenter name: Judy Smilan

Comment: (#67) Opposes land exchange; not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: David Hellmann

Comment: (#66) Opposes land exchange; not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Shirley Nelson

Comment: (#65) Opposes land exchange; not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Oregon Coast Alliance

Comment: (#64) Opposes exchange because it violates state & federal law, and does not provide "overwhelming public benefit"

Response: The department does not agree, and there is no evidence to support this claim. The overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. State laws apply and have been followed, and federal laws (applying to a deed restriction, for instance) will also be followed before the exchange is completed.

Commenter name: Myra Lawson

Comment: (#63) Land exchange is not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Lydia Delgado

Comment: (#62) High standard for BSNA transaction has not been met

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Grant Co. Stockgrowers

Comment: (#61) Exchange not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Oregon Coast Alliance

Comment: (#60) Exchange may not be overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: -J-Ranch

Comment: (#71) The proposal does not represent overwhelming public benefit and harms rural communities

Response: The department does not agree. The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. This claim is debatable, and since there is no information supporting this claim, the department does not agree there is such harm.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#58) Exchange is not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Tammie and Clay McEnroe

Comment: (#74) The proposal does not represent overwhelming public benefit and harms rural communities

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. To date, there is no supporting evidence for this claim.

Commenter name: 1000 Friends of Oregon

Comment: (#56) Exchange is not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Dan Williams

Comment: (#55) Exchange does not represent overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Oregon Coast Alliance

Comment: (#54) Exchange does not represent overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Roberta Stewart

Comment: (#53) Exchange does not meet overwhelming public benefit criteria

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Carol Doty

Comment: (#52) Exchange does not meet overwhelming public benefit criteria

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Grant Co. Public Forest Commission

Comment: (#51) Exchange does not contain sufficient public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Sharon Waterman

Comment: (#48) Previous proposal was not overwhelming public benefit

Response: The department does not agree this is an issue, since the current proposal is relevant to the commission's evaluation, and past proposals are not. The proposal is similar in concept to older versions, but differs in the details.

Commenter name: Sharon Waterman

Comment: (#59) Exchange is not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Oregon Coast Alliance

Comment: (#83) Exchange will set dangerous precedent: of to sacrifice one park for another

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since it took years of negotiation to create a trade which embodies overwhelming public benefit, it is possible the elements which made this trade possible -- the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way, commitments to preserve existing recreational uses -- will not necessarily ever again converge.

Commenter name: Doug Heiken

Comment: (#95) Climate change will affect the coast, and the state will be able to respond quicker if it owns coastal land

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes the trade adds more direct access to the ocean shore to the state park system.

Commenter name: Oregon Coast Alliance

Comment: (#94) Exchange is not consistent with OPRD purpose and long-range goals; trading unique property for mediocre one

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes its purpose and goals call for diversifying the park system, and the proposal brings more oceanfront property into the state park system.

Commenter name: Oregon Farm Bureau

Comment: (#93) Exchange does not meet criteria for public acquisition

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the exchange, when viewed as a whole, complies with OAR 736-019-0070 because it supports the park system plan, Centennial Horizon document, and mission, among other factors.

Commenter name: Oregon Cattlemen's Association

Comment: (#92) Land exchange is not overwhelming public benefit because coastal parks receive more visitation

Response: Visitor counts are not an explicit standard for determining overwhelming public benefit to the state park system, but the department notes the exchange should not decrease the number of people who visit the coast. More oceanfront land is being added to the system and the proposal protects existing recreation access to the ocean shore.

Commenter name: Oregon Coast Alliance

Comment: (#91) Exchange does not align with OPRD mission, strategies, objectives and work plan

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the exchange, when viewed as a whole, complies with OAR 736-019-0070 because it supports the park system plan, Centennial Horizon document, and mission, among other factors.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#88) Land in E. Oregon has no place in an exchange that results in coastal land loss

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the goal is to manage a statewide system, and in its view, the coast system will be strengthened by the proposal even if measured independent of the eastern Oregon property.

Commenter name: David Hellmann

Comment: (#87) Transaction sets a bad precedent for selling public land to developers

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since it took years of negotiation to create a trade which embodies overwhelming public benefit, it is possible the elements which made this trade possible -- the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way, commitments to preserve existing recreational uses -- will not necessarily ever again converge.

Commenter name: Carol Doty

Comment: (#86) Precedent of selling public land to private interests

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since it took years of negotiation to create a trade which embodies overwhelming public benefit, it is possible the elements which made this trade possible -- the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way, commitments to preserve existing recreational uses -- will not necessarily ever again converge.

Commenter name: Judy Thomsen

Comment: (#72) The proposal does not represent overwhelming public benefit and harms rural communities

Response: The department does not agree. The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. This claim is debatable, and since there is no information supporting this claim, the department does not agree there is such harm.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#84) Grave concerns over trade

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#47) Past proposal did not meet overwhelming public benefit

Response: The department does not agree this is an issue, since the current proposal is relevant to the commission's evaluation, and past proposals are not. The proposal is similar in concept to older versions, but differs in the details.

Commenter name: League of Women Voters of Oregon

Comment: (#82) Concern with land exchange setting a precedent allowing a private business to purchase public land for a profit-making venture

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since it took years of negotiation to create a trade which embodies overwhelming public benefit, it is possible the elements which made this trade possible -- the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way, commitments to preserve existing recreational uses -- will not necessarily ever again converge. Outside parties can only propose exchanges, not purchases.

Commenter name: Doug Heiken

Comment: (#81) Approving the exchange could set a tough precedent

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since it took years of negotiation to create a trade which embodies overwhelming public benefit, it is possible the elements which made this trade possible -- the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way, commitments to preserve existing recreational uses -- will not necessarily ever again converge.

Commenter name: Larry Vonderlin

Comment: (#79) Transaction does not help park system

Response: The department does not agree. The commission evaluated many elements and preliminarily found the proposal provides overwhelming public benefits to the state park system when viewed as a whole, subject to review of final information in February 2014. The transaction helps the park system by adding more oceanfront acreage and funds to fight invasive plants, reconfiguring the coast trail system north of Bandon, and expanding recreation lands elsewhere in the state.

Commenter name: Jolly Hibbits

Comment: (#78) The trade does not provide "overwhelming public benefit"

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Lynne Leisy

Comment: (#77) The proposer should show overwhelming public benefit and he hasn't

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Alec Oliver

Comment: (#76) The proposal does not represent overwhelming public benefit and harms rural communities

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. To date, there is no supporting evidence for this claim.

Commenter name: Shane Grant

Comment: (#75) The proposal does not represent overwhelming public benefit and harms rural communities

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. To date, there is no supporting evidence for this claim.

Commenter name: Carol Doty

Comment: (#68) Proposal is poor bargain for Oregon

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Pam Wunderlich

Comment: (#73) The proposal does not represent overwhelming public benefit and harms rural communities

Response: The department does not agree. The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. This claim is debatable, and since there is no information supporting this claim, the department does not agree there is such harm.

Commenter name: Myra & Jim Lawson

Comment: (#85) Land exchange sets precedent

Response: The commission is mindful of the precedent, too. It took years of negotiation to create a trade which embodies overwhelming public benefit. It is possible the elements which made this trade possible -- a proposal for low impact development, the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way -- will never again converge.

Commenter name: Doug Heiken

Comment: (#30) OPRD can look other resources to buy new parks

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes that when budgets are strained, it would be imprudent not to use every available means to extend funds, including the methods encompassed by the proposed trade.

Commenter name: Judy Smilan

Comment: (#46) Commission found the previous proposal to not be beneficial; the new one is not that different

Response: The department does not agree this is an issue, since the current proposal is relevant to the commission's evaluation, and past proposals are not. The proposal is similar in concept to older versions, but differs in the details.

Commenter name: Tess White

Comment: (#70) The proposal does not represent overwhelming public benefit and harms rural communities

Response: The department does not agree. The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. This claim is debatable, and since there is no information supporting this claim, the department does not agree there is such harm.

Commenter name: Oregon Coast Alliance

Comment: (#28) Exchange does not provide a buffer; rather, it brings in an activity (golf) that will have negative impacts on sensitive natural area

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since the Oregon Administrative Rule that addresses state park buffers (736-019-0060-2-c) applies to the acquisition portion of an exchange. As a result, the commission should consider whether the proposed acquired acreage south of Bandon State Natural Area adds a buffer for the ocean shore, which it arguably does. With regards to the portion of Bandon State Natural Area proposed to leave the system, the project doesn't directly alter snowy plover habitat, but it is possible increased human activity will affect the bird, so a special analysis will be delivered to the commission explaining how the state will continue to meet its obligations under the habitat conservation plan.

Commenter name: Oregon Coast Alliance

Comment: (#31) Exchange does not consolidate state park parcels on the coast or Grant Co.

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the Oregon Administrative Rule that addresses consolidating state park parcels (736-019-0060-2-b) applies to acquisitions, and that the acquisition portion of the exchange is not being justified as an effort to consolidate parcels.

Commenter name: Oregon Coast Alliance

Comment: (#32) Exchange does not demonstrate more efficient management and administration of the state parks system (esp. the addition of a mansion)

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the Oregon Administrative Rule that addresses efficient management (736-019-0060-2-b) applies to acquisitions, and that the acquisition portion of the exchange is not being justified as an effort to consolidate parcels.

Commenter name: Oregon Coast Alliance

Comment: (#33) Exchange does not provide access to recreation areas for management or protection of state park parcels

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the Oregon Administrative Rule that addresses access and protection (736-019-0060-2-d) applies to acquisitions, and that the acquisition portion of the exchange is not being justified as an effort to consolidate parcels.

Commenter name: Phillip Johnson

Comment: (#34) Dangerous precedent if value is less

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that while old appraisals were used as a starting point, they will not be used to support any final contract. New appraisals will meet all state standards for independence.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#35) OPRD is not getting appropriate value in return

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that while old appraisals were used as a starting point, they will not be used to support any final contract. New appraisals will meet all state standards for independence.

Commenter name: League of Women Voters of Oregon

Comment: (#36) Commission should proceed with caution

Response: It took years to negotiate the current proposal out of an abundance of caution.

Commenter name: Oregon Coast Alliance

Comment: (#45) Exchange lacks community support

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that some members of the community support it, and some oppose it. Most proposals never earn unanimous support.

Commenter name: Dan Driscoll

Comment: (#111) If approved, litigation will follow

Response: The department believes it has acted within its authority and in a way that complies with all applicable statutes, rules and policies.

Commenter name: Phillip Johnson

Comment: (#90) Doubt the state is getting a fair trade

Response: The department does not agree. In November 2013, the commission requested additional information on the value of the trade, and it will review this new information in February 2014 before deciding how to proceed.

Commenter name: Courtney Johnson

Comment: (#163) Transaction is not entirely according to rules - no environmental report for properties to receive

Response: The department does not agree. In November 2013, the commission requested additional environmental information on properties involved in the trade, and it will review this new information in February 2014 before deciding how to proceed.

Commenter name: John Morris

Comment: (#37) OPRD should provide more information before commission decides land exchange

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that its November 2013 request for additional information has been satisfied.

Commenter name: Cameron La Follette

Comment: (#89) The commission's preliminary decision means it has prejudged the project, making the next action illegal.

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that its November 2013 action was not only preliminary, but wholly subject to alteration based on review of the updated information it requested.

Commenter name: Cameron La Follette

Comment: (#97) The commission's decision violates administrative rules, acquisition policies, exceeds its discretion, and ignores evidence on the record, so it's legally deficient.

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the exchange, when viewed as a whole, complies with OAR 736-019 because it supports the park system plan, Centennial Horizon document, and mission, among other factors.

Commenter name: Oregon Coast Alliance

Comment: (#44) Exchange has been progressing without full disclosure to the public -- many reconfigurations

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that its November 2013 request for additional information has been satisfied. The department notes that information on the exchange and landscape characteristics have been published on its website, and that real estate negotiations are always accompanied by some degree of confidentiality, with proposals changing frequently and significantly from one day to the next.

Commenter name: Oregon Coast Alliance

Comment: (#43) Appraisals are not independent

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that while old appraisals were used as a starting point, they will not be used to support any final contract. New appraisals will meet all state standards for independence.

Commenter name: Oregon Coast Alliance

Comment: (#42) Not enough information to evaluate transaction for impacts (natural resources, cultural) and public benefit

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that its November 2013 request for additional information has been satisfied. The department notes that information on the exchange and landscape characteristics have been published on its website.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#41) Not enough disclosure on the exchange and the quality of land

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that its November 2013 request for additional information has been satisfied. The department notes that information on the exchange and landscape characteristics have been published on its website.

Commenter name: Phillip Johnson

Comment: (#40) No decision until all information is available on all land parcels involved

Response: Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that its November 2013 request for additional information has been satisfied. The department notes that no set of data is ever perfect, so decisions are often made when enough information is available to make a reasonable judgment.

Commenter name: Oregon Coast Alliance

Comment: (#39) Exchange lacks sufficient environmental review; some is outdated and inadequate

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that its November 2013 request for additional information has been satisfied, including additional information on biological values.

Commenter name: Oregon Coast Alliance

Comment: (#38) Appraisals are not current and do not take into account ecosystem services valuation

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that while old appraisals were used as a starting point, they will not be used to support any final contract. New appraisals will meet all state standards for independence, and typically do not include valuation of ecosystem services unless those uses are relevant.

Commenter name: Craig Herman

Comment: (#122) Opposes exchange

Response:

Commenter name: Carol Doty

Comment: (#120) Opposes exchange

Response:

Commenter name: Ken Brooks

Comment: (#119) Opposes exchange

Response:

Commenter name: Cindy Grant

Comment: (#121) Opposes exchange

Response:

Commenter name: Melissa Brooks

Comment: (#118) Opposes exchange

Response:

Commenter name: Scott Myers

Comment: (#117) Opposes exchange

Response:

Commenter name: Ken Holliday

Comment: (#115) Opposes exchange

Response:

Commenter name: Bryce Dimitruk

Comment: (#123) Opposes exchange

Response:

Commenter name: Arlys Fones

Comment: (#125) Opposes exchange

Response:

Commenter name: Dan Driscoll

Comment: (#116) Opposes exchange

Response:

Commenter name: Grant Co. Stockgrowers and Farm Bureau

Comment: (#134) Opposes land exchange

Response:

Commenter name: Oregon Farm Bureau

Comment: (#124) Opposes exchange

Response:

Commenter name: Grant County Court

Comment: (#126) Opposes exchange

Response:

Commenter name: Shannon Rust

Comment: (#127) Opposes exchange

Response:

Commenter name: Mary Ellen Brooks

Comment: (#128) Opposes exchange

Response:

Commenter name: Sharon Livingstone

Comment: (#129) Opposes exchange

Response:

Commenter name: Margaret Stephens

Comment: (#130) Opposes exchange

Response:

Commenter name: Grant Co. Stockgrowers

Comment: (#131) Opposes exchange

Response:

Commenter name: Grant Co. Public Forest Commission

Comment: (#132) Opposes land exchange

Response:

Commenter name: 1000 Friends of Oregon

Comment: (#133) Opposes land exchange

Response:

Commenter name: Shaun Robertson

Comment: (#114) Opposed exchange

Response:

Commenter name: Oregon Coast Alliance

Comment: (#29) Acquisition carries significant additional cost commitments - restoration and ongoing, maintenance costs

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes new properties bring the potential for new revenue. No state park property provides public benefits without support of some sort.

Commenter name: Ken Brooks

Comment: (#80) Acquisition is too expensive for taxpayers

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the acquisition falls within its available resources.

Type of comment: Pro

Commenter name: Michael Scalici

Comment: (#162) The lands OPRD gets are better than BSNA

Response:

Commenter name: Arnie Roblan

Comment: (#137) Positive economic, conservation and recreation outcomes

Response:

Commenter name: Alex Mitchell

Comment: (#104) Exchange provides a cost-effective way for OPRD to acquire new land

Response:

Commenter name: Carol Acklin

Comment: (#112) Lands OPRD gets outweigh the loss of BSNA

Response:

Commenter name: David Comden

Comment: (#136) OPRD will get more valuable land in the trade

Response:

Commenter name: Bruce Barbarasch

Comment: (#110) For acquiring new park properties

Response:

Commenter name: Brian Kraynik

Comment: (#109) Exchange will create overwhelming public benefit

Response:

Commenter name: Reg Pullen

Comment: (#108) Exchange will create jobs and new state parks

Response:

Commenter name: Michael Scalici

Comment: (#107) Exchange will benefit the state Response:

Commenter name: David R. Allen

Comment: (#99) Acquiring Whale Cove and Grouse Mt. is a public benefit Response:

Commenter name: Micheal Scalici

Comment: (#105) Exchange provides public benefit to non-golfers Response:

Commenter name: League of Women Voters of Oregon

Comment: (#96) OPRD should get fair market value for land Response: This is required by rule.

Commenter name: Brian Kraynik

Comment: (#103) Exchange is overwhelming public benefit Response:

Commenter name: Greg Mead

Comment: (#102) Exchange demonstrates overwhelming public benefit Response:

Commenter name: Ty Stubblefield

Comment: (#101) Exchange demonstrates overwhelming public benefit Response:

Commenter name: Juliette Jones

Comment: (#100) Acquiring Whale Cove and Grouse Mt. is a public benefit Response:

Commenter name: Chris Luecke

Comment: (#135) OPRD will benefit - land and gorse control Response:

Commenter name: Gray Grieve

Comment: (#106) Exchange represents public benefit Response:

Commenter name: Doug Heiken

Comment: (#138) Supports acquisition of Whale Cove and Grouse Mt. when other resources become available Response:

Commenter name: Brian Kraynik

Comment: (#155) Supports exchange Response:

Commenter name: Sandra Kennedy

Comment: (#148) Supports exchange Response:

Commenter name: Chris Luecke

Comment: (#157) Supports exchange Response:

Commenter name: Arnie Roblan

Comment: (#139) Supports exchange

Response:

Commenter name: Chris Labhart

Comment: (#140) Supports exchange

Response:

Commenter name: Ty Stubblefield

Comment: (#141) Supports exchange

Response:

Commenter name: Greg Mead

Comment: (#142) Supports exchange

Response:

Commenter name: Mary Smith

Comment: (#143) Supports exchange

Response:

Commenter name: Bo Winder

Comment: (#144) Supports exchange

Response:

Commenter name: David Hess

Comment: (#145) Supports exchange

Response:

Commenter name: Alex Linke

Comment: (#158) Supports land exchange

Response:

Commenter name: Tom Kennedy

Comment: (#147) Supports exchange

Response:

Commenter name: David R. Allen

Comment: (#161) Supports land exchange

Response:

Commenter name: Brian Kraynik

Comment: (#149) Supports exchange

Response:

Commenter name: Chris Luecke

Comment: (#150) Supports exchange

Response:

Commenter name: Gray Grieve

Comment: (#151) Supports exchange

Response:

Commenter name: David Comden

Comment: (#152) Supports exchange

Response:

Commenter name: Reg Pullen

Comment: (#153) Supports exchange

Response:

Commenter name: Michael Scalici

Comment: (#154) Supports exchange

Response:

Commenter name: Alex Mitchell

Comment: (#156) Supports exchange

Response:

Commenter name: Carol Acklin

Comment: (#160) Supports land exchange

Response:

Commenter name:

Comment: (#146) Supports exchange

Response:

Commenter name: Nancy Evans

Comment: (#159) Supports land exchange

Response:

Property: BSNA

Type of comment: Con

Commenter name: Dan Williams

Comment: (#261) BSNA is rare and should be preserved

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Judy Smilan

Comment: (#199) Concerns with overuse of water resources

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Carol Doty

Comment: (#198) Another golf course would place too much competition of water resources, which are already strained

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Doug Heiken

Comment: (#197) Water use for a golf course could have adverse effects on the environment

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Oregon Coast Alliance

Comment: (#258) Exchange will result in fragmentation of BNSA

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, as reconfigured the Bandon State Natural Area will still be one, unified tract extending further south that it does currently.

Commenter name: Cindy Grant

Comment: (#195) Water use for a golf course could have adverse effects on local agriculture

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Carol Doty

Comment: (#259) Golf course at BSNA will change the habitat in the remaining public portion of the park

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. Special attention will be given to snowy plover management so the state can continue to meet its obligations on public ground, and Bandon Biota will receive plant habitat improvement recommendations.

Commenter name: Ken Brooks

Comment: (#260) The loss of BSNA is unacceptable - ecological qualities

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposed new landowner has a good track record as a natural resource steward, not all of the outgoing land has high natural resource value, the incoming property has similar natural resource value, and the agreement includes funds to improve the natural resource quality on remaining public lands.

Commenter name: Jeffrey Haga

Comment: (#192) OPRD should not sell and allow someone to reshape the dunes

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Sharon Waterman

Comment: (#273) OPRD should do its own gorse control

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the gorse control funds included as part of the exchange will help the department finance its own efforts.

Commenter name: Lynne Leisy

Comment: (#190) Bandon Biota destroyed a dune during previous construction

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Greg Patrick

Comment: (#202) Bandon Natural Area is unique and should be preserved as is

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south while protecting existing ocean access points.

Commenter name: Bryce Dimitruk

Comment: (#188) Not enough water to support a golf course and maintain proper river flow

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Bryce Dimitruk

Comment: (#187) Golf course poses pollution threat to local river system

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Doug Heiken

Comment: (#264) The public value of coastland is higher than that of rangelands

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system, but the department notes the exchange adds more direct ocean shore access to the state park system while protecting existing access points.

Commenter name: Carol Doty

Comment: (#268) Gorse can be eradicated

Response: This is one among the many prongs of an effort to combat gorse. Public investment and cooperation will continue to be necessary.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#270) Gorse can be eradicated

Response: This is one way, among several, the department is dealing with the gorse problem. Public investment and cooperation will continue to be necessary.

Commenter name: Oregon Coast Alliance

Comment: (#271) Gorse is not enough reason to trade BSNA

Response: This is one way, among several, the department is dealing with the gorse problem. Public investment and cooperation will continue to be necessary.

Commenter name: Oregon Coast Alliance

Comment: (#272) OPRD can manage gorse

Response: This is one way, among several, the department is dealing with the gorse problem. Public investment and cooperation will continue to be necessary.

Commenter name: Bryce Dimitruk

Comment: (#191) Not opposed to another golf course; just not in any area that borders the New River/ Flores

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Oregon Coast Alliance

Comment: (#248) Recreation activities for BSNA already extensive; recreation activities for incoming properties questionable

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the exchange should not reduce the number of people who visit the coast, or change the kind of recreation available since existing access to the ocean shore is protected under the proposal, and adds new ocean shore access to the south of Bandon State Natural Area.

Commenter name: Oregon Coast Alliance

Comment: (#236) Exchange would not protect the scenic, cultural and historical resources of the coast

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the exchange brings more ocean-front land into the system, and protects existing recreational use at the south end of the Bandon State Natural Area.

Commenter name: Jeffrey Haga

Comment: (#27) Precious natural land and habitat will be lost

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes it is sometimes necessary to decide how best to protect and improve its natural properties. The exchange will improve the overall quality of the state park system thanks to increased support for removing invasive plants, an expansion of property closer to the ocean, and protection of scenic qualities at Whale Cove.

Commenter name: Oregon Coast Alliance

Comment: (#238) Exchange would trade multiple recreation activities for one (golf)

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the exchange protects existing recreational use at the south end of the Bandon State Natural Area, adds additional recreation land south of the property, and improves the route used by the Oregon Coast Trail north of Bullards Beach.

Commenter name: Oregon Coast Alliance

Comment: (#239) Private ownership & development could lead to the spread of gorse

Response: The exchange sets aside funding to prevent the spread of gorse, and rehabilitate ground already invaded by the plant.

Commenter name: Julia Smith

Comment: (#240) Bird watching on BSNA would bring more revenue than golf

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes the exchange should not reduce the number of people who visit the coast for birdwatching.

Commenter name: Bruce Barbarasch

Comment: (#241) Demand for access to the coast will increase and land there should remain in public ownership

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the exchange should not reduce the number of people who visit the coast, or change the kind of recreation available since existing access to the ocean shore is protected under the proposal, and adds new ocean shore access to the south of Bandon State Natural Area.

Commenter name: Carol Doty

Comment: (#242) Coastal parks are the most popular

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes the exchange should not reduce the number of people who visit the coast, and that existing recreation access to the ocean shore is protected as part of the proposal.

Commenter name: Oregon Coast Alliance

Comment: (#243) Coastal parks are the most popular

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes the exchange should not reduce the number of people who visit the coast, and that existing recreation access to the ocean shore is protected as part of the proposal.

Commenter name: Jeffrey Haga

Comment: (#200) Untouched area should be protected

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system and obtain more funding for protecting natural areas at the same time.

Commenter name: Carol Doty

Comment: (#246) BSNA is rare plant habitat

Response: As reconfigured, the Bandon State Natural Area will still include rare plant habitat in public ownership. As a courtesy, the department will deliver natural resource management recommendations to help the new land owner protect and improve plant habitat.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#257) Golf course attracts invasive species, which threaten fragile populations, including Snowy Plover

Response: The project doesn't directly alter snowy plover habitat, but it is possible increased human activity could affect the bird and precautions are being drafted to minimize potential secondary impact. A special analysis will be delivered to the commission in February 2014 explaining how the state will continue to meet its obligations under the habitat conservation plan.

Commenter name: Lydia Delgado

Comment: (#252) Wild coastal area are among the scarcest of natural resources

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes that under the proposal, the Bandon State Natural Area boundary is being reconfigured and shifted south, allowing new natural resource lands to enter the state park system, and adding new funds to improve and protect natural landscapes. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Bryce Dimitruk

Comment: (#253) BSNA is outstanding natural, scenic, ecological and recreation site that should be protected for future generations

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes that under the proposal, most of the Bandon State Natural Area will remain public, new natural resource lands are entering the state park system, and new funds will be available for improving and protecting natural landscapes.

Commenter name:

Comment: (#207) It's wrong to develop a natural area.

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes that under the proposal, the Bandon State Natural Area boundary is being reconfigured and shifted south, allowing new natural resource lands to enter the state park system, and adding new funds to improve and protect natural landscapes in the state park system.

Commenter name: Lynne Leisy

Comment: (#254) BSNA is unique property

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Linda Tarr

Comment: (#255) Concerned that developing BSNA will threaten Snowy Plovers and dune system

Response: The project doesn't directly alter snowy plover habitat, but it is possible increased human activity could affect the bird and precautions are being drafted to minimize potential secondary impact. A special analysis will be delivered to the commission in February 2014 explaining how the state will continue to meet its obligations under the habitat conservation plan.

Commenter name: Charlie Bruce

Comment: (#256) Development will negatively affect western snowy plovers; more analysis needed

Response: The project doesn't directly alter snowy plover habitat, but it is possible increased human activity could affect the bird and precautions are being drafted to minimize potential secondary impact. A special analysis will be delivered to the commission in February 2014 explaining how the state will continue to meet its obligations under the habitat conservation plan.

Commenter name: Dan Williams

Comment: (#203) The state should be able to manage 280 acres with gorse better than 6,300 acres in Eastern Oregon

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes properties in both areas of the state will require ongoing public investment.

Commenter name: Roberta Stewart

Comment: (#269) OPRD can eradicate gorse

Response: This is one among the many prongs of an effort to combat gorse. Public investment and cooperation will continue to be necessary.

Commenter name: Carol Doty

Comment: (#244) Coastal parks attract more visitors

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes the exchange should not reduce the number of people who visit the coast, and that existing recreation access to the ocean shore is protected as part of the proposal.

Commenter name: Cindy Grant

Comment: (#15) BSNA is unique & of outstanding natural significance

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Carol Doty

Comment: (#4) BSNA is a rare natural area that deserves protection

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more ecologically important oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Julia Smith

Comment: (#5) BSNA is unique & of outstanding natural & environmental significance

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more significant oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Sharon Waterman

Comment: (#280) Concerns with water use and natural resource protection

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Julia Smith

Comment: (#6) BSNA is unique and should be protected

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#7) Coastal lands are scarce and of high value

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Lydia Delgado

Comment: (#274) OPRD should not trade BSNA just because it has gorse; deal with the problem

Response: This is one way, among several, the department is dealing with the gorse problem. Public investment and cooperation will continue to be necessary.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#3) BSNA has ecological value

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more ecologically important oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Oregon Coast Alliance

Comment: (#14) BSNA is unique and should be protected

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Sharon Waterman

Comment: (#9) BSNA is unique and should be protected

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Doug Heiken

Comment: (#16) Gorse control will only provide short-term benefits

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that much of the fight against gorse is about momentum and making substantial inroads against the plant in a short period of time. The trade injects a substantial amount of new energy into the local fight against gorse that will make subsequent public investments more successful.

Commenter name: Myra Lawson

Comment: (#298) Bandon property is good for varied recreation

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the exchange should not reduce the number of people who visit the coast, or change the kind of recreation available since existing access to the ocean shore is protected under the proposal.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#333) Need assessment of golf course impact on groundwater and wildlife habitat

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Judy Smilan

Comment: (#20) Gorse is not a reason to trade a rare property

Response: No single factor determines overwhelming public benefit, but in its judgment, the entire proposal -- including this one element -- contains overwhelming public benefits to the state park system.

Commenter name: Oregon Coast Alliance

Comment: (#328) Land has native flora and fauna, some threatened and endangered

Response: There are no federally-listed species known on the property. Known state-listed species are the silvery phacelia (plant) and Western pond turtle. OPRD is following OAR 603-073 and ORS 564 to protect these species.

Commenter name: Oregon Coast Alliance

Comment: (#324) Golf is common recreation

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Ralph Baxter

Comment: (#24) BSNA is without comparison and priceless

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#10) BSNA should be preserved

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Roberta Stewart

Comment: (#169) Cannot determine BSNA's real value as natural habitat

Response: Appraisals are the standard tool for estimating economic value. The natural resource values have been estimated using a noneconomic approach.

Commenter name: Doug Heiken

Comment: (#275) Even well-designed golf will shrink the area of potentially occupied habitat to threatened and rare species

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposed new landowner has a good track record as a natural resource steward, and it will include a list of recommendations for improving the habitat as part of the exchange.

Commenter name: Doug Heiken

Comment: (#175) BNSA is recognized as a sensitive natural assets to be enjoyed with minimal infrastructure; golf is not minimal infrastructure

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more natural oceanfront by expanding to the south. Bullards Beach State Park coexists with golf as a neighbor.

Commenter name: League of Women Voters of Oregon

Comment: (#171) Public must retain access to the beach

Response: The proposed agreement protects existing public access to the ocean shore.

Commenter name: Roberta Stewart

Comment: (#173) Free golf every day could not provide the quality of family recreation found in state parks

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south, and the proposal protects existing recreation opportunities.

Commenter name: Phillip Nemrava

Comment: (#172) State should protect beach access

Response: The proposed agreement protects existing public access to the ocean shore.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#279) Bandon Dunes has history of non-compliance on water permit

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Dave Kruse

Comment: (#276) Noxious weeds should be removed from Bandon land

Response: True, and the exchange provides more funding to accomplish this task.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#168) Exchange minimizes buffer rather than increasing it

Response: The Department understands OSCC is addressing the consideration of buffers under OAR 736-019-0060(2)(c). That provision requires the Commission to consider whether an acquisition, in this case the areas acquired in the proposed exchange, provides a buffer to a state park parcel. The Department notes that the acquired area in the reconfigured BNSA provides a buffer to the ocean shore.

Commenter name: Roberta Stewart

Comment: (#167) Exchange will reduce buffer

Response: Oregon Administrative Rule 736-019-0060(2)(c) requires the Commission to consider whether an acquisition, in this case the areas acquired in the proposed exchange, provides a buffer to a state park parcel. The Department notes that the acquired areas in the reconfigured BNSA does provide a buffer to the ocean shore.

Commenter name: Oregon Coast Alliance

Comment: (#277) Coastal properties serve more people than Eastern Oregon ones

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes the exchange should not reduce the number of people who visit the coast, adds more oceanfront property to the state park system, and that existing recreation access to the ocean shore is protected as part of the proposal.

Commenter name: Judy Smilan

Comment: (#165) BSNA is rare and should remain public

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south.

Commenter name: Judy Smilan

Comment: (#278) Coastal land is rare

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Lynne Leisy

Comment: (#174) BSNA has diverse recreation opportunities

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. Existing recreation access to the ocean shore is protected under the proposal.

Commenter name: Arlys Fones

Comment: (#234) Don't need a new golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Cindy Grant

Comment: (#223) Losing cranberry bogs affects the "overwhelming public benefit"

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Myra & Jim Lawson

Comment: (#325) Golf resort has had some impact on the community, but not as great as some believe (low taxes, low use of existing in-town facilities, jobs filled with imports, higher flight costs)

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Carol Doty

Comment: (#237) Protecting coastal park system is very important

Response: The exchange includes support for improving the quality of coastal public properties by attacking gorse and rerouting recreational trails.

Commenter name: Oregon Coast Alliance

Comment: (#1) Part of the land is not zoned for a golf course because the state protects farmland

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Julia Smith

Comment: (#233) Don't need a new golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Shirley Nelson

Comment: (#232) Bandon has plenty of golf courses

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Myra Lawson

Comment: (#320) Future golf course development may compete with other local businesses

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Oregon Coast Alliance

Comment: (#335) Oregonians hold coastal properties in high regard

Response: Overall, the exchange includes improvements to the coast state park system thanks to more oceanfront incoming property, protecting scenic Whale Cove, and funds for combatting invasive plants.

Commenter name: Sharon Waterman

Comment: (#231) Bandon does not need another golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Sharon Waterman

Comment: (#265) Bandon Biota has enough land for another golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Julia Smith

Comment: (#282) Bandon Biota has enough land for another golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Lydia Delgado

Comment: (#249) A new golf course is not that beneficial for the community

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Carol Doty

Comment: (#250) Another golf course is not overwhelming public benefit

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Myra Lawson

Comment: (#251) Bandon has plenty of golf courses

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: David Hellmann

Comment: (#285) A golf course could be developed on other land without using public land

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Roberta Stewart

Comment: (#284) BSNA not needed for new golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Lynne Leisy

Comment: (#283) Bandon Biota has enough land for another golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Oregon Coast Alliance

Comment: (#266) Bandon Biota has enough land for another golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Oregon Coast Alliance

Comment: (#281) Farms adjacent to the golf course may suffer from increase water demand

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Margaret Stephens

Comment: (#247) Trading natural area for a private golf course is not overwhelming public benefit

Response: The department does not agree this concern applies in this instance. When evaluating the proposal, the commission considers whether there is overwhelming benefit to the state park system, but does not judge how the outgoing property will be used (except to evaluate whether the new adjacent use is compatible with ongoing operation of land remaining in the state park system).

Commenter name: Judy Smilan

Comment: (#185) Interior portions of BSNA will be ocean-front property in the future

Response: It is possible, but not certain. All land owners on the coast will have to make major adjustments if that becomes a reality.

Commenter name: Larry Vonderlin

Comment: (#170) Wrong to turn public land private for a golf course

Response: The commission's decisions are based on judging overwhelming benefit to the state park system. The department notes that a walk-in golf course should not conflict with ongoing use of the BSNA.

Commenter name: Rebecca Miller

Comment: (#204) Coast land is limited; state should hold on to it

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes that under the proposal, new oceanfront natural resource lands are entering the state park system.

Commenter name: Oregon Coast Alliance

Comment: (#201) OPRD has a duty to protect land at BSNA, not give it away

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Doug Heiken

Comment: (#196) Secondary development around the golf course could adversely affect existing property uses, including prime farm land

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Cindy Grant

Comment: (#194) Golf course will pose conflicts w neighbors (cranberry bog areas)

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Mike Schaer

Comment: (#193) Keiser's acquisition sets off a domino effect that could threaten other land uses and Bandon area water resources, especially along Johnson Creek.

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Margaret Stephens

Comment: (#12) OPRD should protect BSNA

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#11) OPRD not clear why BSNA no longer needed, required or useful

Response: The overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Oregon Coast Alliance

Comment: (#206) Park system loses coastland

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes that under the proposal, new oceanfront natural resource lands are entering the state park system.

Commenter name: Judy Smilan

Comment: (#186) Creation of a few jobs is not overwhelming public benefit

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Doug Heiken

Comment: (#208) In 2011 a similar proposal was deemed to not provide overwhelming public benefit

Response: The department does not agree this is an issue, since the current proposal is relevant to the commission's evaluation, and past proposals are not. The proposal is similar in concept to older versions, but differs in the details.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#184) BSNA may become more valuable as shoreline erodes

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes that while severe shoreline erosion at this spot is possible, it is not certain. All land owners on the coast will have to make major adjustments if that becomes a reality.

Commenter name: Greg Patrick

Comment: (#626) Another golf course does not serve the local economy or environment

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Margaret Stephens

Comment: (#183) OPRD should find other ways to acquire the lands in the exchange

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes that when budgets are strained, it would be imprudent not to use every available means to extend funds, including the methods encompassed by the proposed trade.

Commenter name: Lydia Delgado

Comment: (#182) Too much would be lost in the exchange

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Lynne Leisy

Comment: (#181) Cash for gorse removal is not public benefit

Response: In the commission's judgment, it is one among several contributing parts of the proposal.

Commenter name: Charlie Bruce

Comment: (#230) Bandon does not need another golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Bruce Barbarasch

Comment: (#2) Against selling coastal land

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary as part of an exchange (outside parties have to propose exchanges, not merely land sales), but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Lydia Delgado

Comment: (#225) Bandon could be better served by diverse economy, not just service jobs from another golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Doug Heiken

Comment: (#166) Public interest better served if BSNA remained in public ownership

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes the proposal reconfigures the Bandon State Natural Area boundary, but the resulting property is still one, contiguous whole that will encompass more oceanfront by expanding to the south. This is a unique opportunity to protect more oceanfront acreage in the state park system.

Commenter name: Julia Smith

Comment: (#313) Community benefits could be achieved differently, not on BSNA

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Doug Heiken

Comment: (#219) Opposes disposal of BSNA because it is not "overwhelming public benefit"

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name:

Comment: (#229) Another golf course does not serve the local economy.

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Jolly Hibbits

Comment: (#228) Another golf course does not serve the local economy in Bandon or Grant Co

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Shirley Nelson

Comment: (#227) Questions whether golf helps local economy

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Judy Smilan

Comment: (#26) OPRD's mission is to protect land from development, not to turn it over to developers

Response: When viewed in its entirety, this exchange protects land. There's nothing in the department mission that prevents it from using land trades to improve the overall system. Not all development is equal, and a low-development walk-in golf course is a compatible neighbor for a state park.

Commenter name: Lynne Leisy

Comment: (#226) Coos Co. still has high unemployment

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Lee Insko

Comment: (#224) Public land with natural resource value shouldn't be made private.

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Judy Smilan

Comment: (#222) Transaction sets a bad precedent for selling public land to developers

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since it took years of negotiation to create a trade which embodies overwhelming public benefit, it is possible the elements which made this trade possible -- the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way, commitments to preserve existing recreational uses -- will not necessarily ever again converge.

Commenter name: Julia Smith

Comment: (#221) Trade sets a bad precedent for turning public land private

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since it took years of negotiation to create a trade which embodies overwhelming public benefit, it is possible the elements which made this trade possible -- the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way, commitments to preserve existing recreational uses -- will not necessarily ever again converge.

Commenter name: Oregon Farm Bureau

Comment: (#205) Proposal is not overwhelming public benefit because BSNA will lose land

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes that under the proposal, the Bandon State Natural Area boundary is being reconfigured and shifted south, allowing new natural resource lands to enter the state park system, and adding new funds to improve and protect natural landscapes in the state park system.

Commenter name: Linda Tarr

Comment: (#220) Precedent of selling public land to private interests

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since it took years of negotiation to create a trade which embodies overwhelming public benefit, it is possible the elements which made this trade possible -- the availability of alternate properties that will improve the overall park system, financial support to combat invasives in a meaningful way, commitments to preserve existing recreational uses -- will not necessarily ever again converge.

Commenter name: Julia Smith

Comment: (#180) Trade does not have enough guarantees and could lead to more development

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that according to the proposed terms of the exchange, if the land is offered for sale (for instance, to a business that would develop it different than proposed), the department has the right to re-purchase the property.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#217) Bandon Biota should donate lands in the exchange to OPRD

Response: The commission cannot compel such a donation.

Commenter name: Craig Herman

Comment: (#216) There's no clear benefit to allowing 280 acres of public land leave the system near Bandon.

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Ken Brooks

Comment: (#212) BSNA was given to OPRD for park purposes, not for personal, economic gain

Response: The Bandon State Natural Area portion of the exchange must be approved by the federal government to proceed.

Commenter name: Sharon Waterman

Comment: (#13) BSNA is for public benefit, not private development

Response: The department does not agree this is an issue, but notes the existing public use of the outgoing portion of BSNA -- trail access to the beach -- will be protected through an easement, and that the benefits of a natural area are being preserved by redrawing the Bandon State Natural Area boundary and extending the property to the south.

Commenter name: Ralph Baxter

Comment: (#23) BSNA appraisal is outdated; using it is detrimental to the state

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that while old appraisals were used as a starting point, they will not be used to support any final contract. New appraisals will meet all state standards for independence.

Commenter name: Ralph Baxter

Comment: (#22) BSNA appraisal is not fair; comparable properties used are not similar

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that while old appraisals were used as a starting point, they will not be used to support any final contract. New appraisals will meet all state standards for independence.

Commenter name: Ralph Baxter

Comment: (#21) BSNA appraisal does not reflect accurate value

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that while old appraisals were used as a starting point, they will not be used to support any final contract. New appraisals will meet all state standards for independence.

Commenter name: Cameron La Follette

Comment: (#19) The Commission must measure the impact this exchange has on the coast sub-component of the state park system

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system as a whole.

Commenter name: Cameron La Follette

Comment: (#18) The commission has not fully measured the geographic and biological loss to Bandon State Natural Area.

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that because no set of data is ever perfect, decisions are often made when enough information is available to make a reasonable judgment.

Commenter name: Roberta Stewart

Comment: (#17) BSNA's value should be much higher than estimated (\$3.2 million)

Response: New appraisals for all properties involved in the exchange will be ready by February 2014 and will be used by the Commission in making their decision.

Commenter name: Rebecca Miller

Comment: (#164) State should consider a lease -- generate revenues

Response: A lease wouldn't meet the proposer's requirements.

Commenter name: Ralph Baxter

Comment: (#25) BSNA value should be determined independently; OPRD should not use appraisal developed for the buyer

Response: Old appraisals were used as a starting point, but will not be used to support any final contract. New appraisals will meet all state standards for independence.

Commenter name: Carol Doty

Comment: (#211) BSNA has deed restriction

Response: The Bandon State Natural Area portion of the exchange must be approved by the federal government to proceed.

Commenter name: League of Women Voters of Oregon

Comment: (#235) OPRD should request environmental assessment of golf course - impact of water use on agricultural and residential use; impact of chemicals for golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Julia Smith

Comment: (#215) Trade removes federal protection

Response: The Bandon State Natural Area portion of the exchange must be approved by the federal government to proceed.

Commenter name: Oregon Coast Alliance

Comment: (#214) Intended use (golf course) does not qualify under the Recreation and Public Purposes Act of 1954

Response: The Bandon State Natural Area portion of the exchange must be approved by the federal government to proceed.

Commenter name: Doug Heiken

Comment: (#178) OPRD must consider all possible uses of the exchange, as proponent is seeking full fee title to the land, and thus, golf is not guaranteed

Response: If the land is put to some other purpose, the department has the right to re-purchase the property.

Commenter name: Oregon Coast Alliance

Comment: (#213) Exchange violates federal law because it's inconsistent with the Coos Bay Resources Management Plan

Response: The Bandon State Natural Area portion of the exchange must be approved by the federal government to proceed.

Commenter name: Myra & Jim Lawson

Comment: (#176) Exchange proposal should have restrictions - only golf, no other development

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that according to the proposed terms of the exchange, if the land is offered for sale (for instance, to a business that would develop it different than proposed), the department has the right to re-purchase the property.

Commenter name: Oregon Coast Alliance

Comment: (#210) BSNA has deed restriction

Response: The Bandon State Natural Area portion of the exchange must be approved by the federal government to proceed, and any cost to satisfy the deed restrictions will be funded by Bandon Biota.

Commenter name: League of Women Voters of Oregon

Comment: (#262) Consider long-term lease rather than sale of BNSA

Response: The proposer is only interested in title to the property.

Commenter name: Oregon Shores Conservation Coalition

Comment: (#177) No certainty that BSNA will only be used for golf

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that according to the proposed terms of the exchange, if the land is offered for sale (for instance, to a business that would develop it different than proposed), the department has the right to re-purchase the property.

Commenter name: Myra & Jim Lawson

Comment: (#189) Assess impact on water resources

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The department notes there are other jurisdictions responsible for ensuring compliance with federal, state and local laws and ordinances.

Commenter name: Doug Heiken

Comment: (#209) BSNA came with deed restrictions that could have severe financial consequences (fair market value compensation)

Response: The Bandon State Natural Area portion of the exchange must be approved by the federal government to proceed, and any cost to satisfy the deed restrictions will be funded by Bandon Biota.

Commenter name: League of Women Voters of Oregon

Comment: (#179) Place restrictions on BNSA to ensure only golf could be developed

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that according to the proposed terms of the exchange, if the land is offered for sale (for instance, to a business that would develop it different than proposed), the department has the right to re-purchase the property.

Commenter name: William P. Russell

Comment: (#263) Don't sell BSNA; offer a lease with prudent conditions, including ongoing gorse control

Response: The proposer is only interested in title to the property.

Commenter name: Bryce Dimitruk

Comment: (#218) Land swap is not overwhelming public benefit

Response: The commission's evaluation of the proposal encompasses many elements so it can apply the overwhelming public benefit standard to the proposal as a whole. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014.

Commenter name: Doug Heiken

Comment: (#267) Proponent already controls enough land to build another golf course

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Lynne Leisy

Comment: (#8) Loss of BSNA is not public benefit

Response: This factor has been considered as part of the commission's evaluation of the many elements involved, but the overwhelming public benefit standard is based on the commission's review of the entire proposal. The commission has preliminarily indicated that the overwhelming public benefit standard has been met, subject to review of final information in February 2014. The department notes most of the Bandon State Natural Area will remain public.

Type of comment: Pro

Commenter name: David Comden

Comment: (#307) BSNA is covered in gorse

Response:

Commenter name: David Comden

Comment: (#308) BSNA is not natural

Response:

Commenter name: John Hull

Comment: (#309) BSNA is not widely used

Response:

Commenter name: Gray Grieve

Comment: (#304) BSNA has limited use

Response:

Commenter name: Juliette Jones

Comment: (#310) BSNA is not widely used

Response:

Commenter name: John Hull

Comment: (#311) BSNA with a golf course will be more widely used

Response:

Commenter name: John Hull

Comment: (#314) Current golf courses are great environments for wildlife

Response:

Commenter name: Larry Vonderlin

Comment: (#245) More people use state parks than golf

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system.

Commenter name: Carol Acklin

Comment: (#302) BSNA has limited access and use

Response:

Commenter name: Michael Scalici

Comment: (#305) BSNA has low accessibility

Response:

Commenter name: Juliette Jones

Comment: (#303) BSNA has limited public access

Response:

Commenter name: Chris Luecke

Comment: (#301) BSNA does not get much use

Response:

Commenter name: Chris Luecke

Comment: (#300) BSNA currently presents limited use by the public

Response:

Commenter name: Tom Kennedy

Comment: (#299) Both properties are unique

Response:

Commenter name: Nancy Evans

Comment: (#297) Bandon Dunes are good for the environment and help local farmers

Response:

Commenter name: David Comden

Comment: (#295) Bandon Biota will improve BSNA ecosystem

Response:

Commenter name: David Comden

Comment: (#292) Bandon Biota has had success eradicating gorse

Response:

Commenter name: Michael Scalici

Comment: (#291) Bandon Biota has good track record of land stewardship

Response:

Commenter name: Michael Scalici

Comment: (#306) BSNA has low value to salmonids and water birds

Response:

Commenter name: John Hull

Comment: (#326) Gorse control is public benefit

Response:

Commenter name: Alex Linke

Comment: (#336) Proponent has good history of preserving natural areas

Response:

Commenter name: Wilderness Coast Alliance

Comment: (#334) New golf course will be built to support the environment

Response:

Commenter name: David R. Allen

Comment: (#332) More people will enjoy BSNA as a golf course than they do now

Response:

Commenter name: Mike Keiser

Comment: (#316) Exchange will bring recreation (hiking) to unused land

Response:

Commenter name: Mike Keiser

Comment: (#312) Committed to natural and environmental values

Response:

Commenter name: John Hull

Comment: (#327) Gorse poses fire risk, which increases the liability to the state

Response:

Commenter name: Gray Grieve

Comment: (#329) Land to be exchanged will receive more use than BSNA

Response:

Commenter name: Brian Kraynik

Comment: (#322) Golf course will have small environmental impact

Response:

Commenter name: Chris Luecke

Comment: (#321) Golf course may improve access to the beach

Response:

Commenter name: Mike Keiser

Comment: (#319) Exchange will result in protection of South Coast

Response:

Commenter name: Mike Keiser

Comment: (#318) Exchange will not impact snowy plovers

Response:

Commenter name: Reg Pullen

Comment: (#317) Exchange will control the spread of gorse, and OPRD does not have the funds to do what's needed

Response:

Commenter name: David R. Allen

Comment: (#288) A new golf course will bring more traffic to downtown and improve the local economy

Response:

Commenter name: Carol Acklin

Comment: (#287) A golf course would provide better use of BSNA

Response:

Commenter name: David Comden

Comment: (#290) Bandon Biota can create jobs, provide recreation and protect environment

Response:

Commenter name: Carol Acklin

Comment: (#289) A new golf course will help the economy

Response:

Commenter name: Chris Luecke

Comment: (#286) A golf course would benefit the local economy

Response:

Commenter name: Alex Linke

Comment: (#330) Local economy has benefitted from golf development

Response:

Commenter name: Tom Kennedy

Comment: (#296) Bandon Dunes are a significant economic force and good custodians of properties

Response:

Commenter name:

Comment: (#323) Golf has been good for local economy

Response:

Commenter name: Wilderness Coast Alliance

Comment: (#315) Exchange will benefit the community - gorse control, jobs, scholarships

Response:

Commenter name: Juliette Jones

Comment: (#331) Local economy will benefit from golf development

Response:

Commenter name: Eastern Oregon Professional Services

Comment: (#337) Supports exchange

Response:

Commenter name: David Comden

Comment: (#294) Bandon Biota is a good neighbor

Response:

Commenter name: John Hull

Comment: (#293) Bandon Biota is a good neighbor

Response:

Property: Grouse

Type of comment: Con

Commenter name: Various Grant Co. citizens, local gov, buss

Comment: (#516) Grouse Mt. is not unique and not fit for park (difficult access, low potential visitation, too large)

Response: Uniqueness is not a criteria for land acquisitions, the property is easily accessed from Highway 395. It is true every new property runs the risk of taking time to find its full audience, but this challenge is faced as part of the public planning process. No park, ever, has started with a 100% chance of success.

Commenter name: Grant County Court

Comment: (#429) Grouse Mt. is not significant or exceptional

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Ken Brooks

Comment: (#513) Weed infestation is significant and will require continuous investment

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes every land owner faces this cost.

Commenter name: Cici Brooks

Comment: (#432) The property is too small to serve more than a few hunters per season.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: Cici Brooks

Comment: (#503) There are a million and a half acres of huntable land in the county already.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes the state park experience provides quality overnight accommodations that will likely set it apart from other opportunities in the county.

Commenter name: Grant Co. Public Forest Commission

Comment: (#489) Nothing outstanding about Grouse Mt. to make it a state park

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Gail Enright

Comment: (#488) Grouse Mt. is not suited for a park

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Mike Kilpatrick

Comment: (#456) There are problems with water rights.

Response: While this issue is not among the criteria considered by the commission when evaluating an acquisition, the department will resolve any outstanding water issues.

Commenter name: Gail Enright

Comment: (#377) Grouse Mt. is not ready to be used as a park

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes new properties are planned through a public process to turn them into a park.

Commenter name: Grant Co. Public Forest Commission

Comment: (#457) Grant co. as animal sanctuary is not desirable because they animals will destroy neighboring crops, property and irrigation systems

Response: The department will work with county and state officials to create an approach to wildlife management that reduces property damage and increases hunting opportunities.

Commenter name: Mary Burke

Comment: (#466) Not enough due diligence on water rights

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Grant Co. Public Forest Commission

Comment: (#468) Concerns about water rights changes and potential detrimental effect on farming and ranching

Response: The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Shaun Robertson

Comment: (#428) Grouse Mt. is not remarkable

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Grant Co. Public Forest Commission

Comment: (#378) Doubts that OPRD would be able to control noxious weeds

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes no landowner can guarantee success in the fight against weeds, but the department will establish a weed control program.

Commenter name: Craig Herman

Comment: (#517) Grouse Mt. does not seem unique and or fit for park

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. "Unique" is not a criteria used to evaluate prospective acquisitions. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Harriet Crum

Comment: (#487) Grouse Mt. is not attractive for a state park

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Ken Brooks

Comment: (#342) High cost to restore Grouse Mt. to historic vegetation types

Response: A specific restoration goal has not yet been set. Goals like these are determined through a public planning process, then the department pursues funding through its own budget, volunteers and grants. OPRD will likely continue the restoration trajectory initiated by the current landowner.

Commenter name: Shaun Robertson

Comment: (#519) Grouse Mt. is scenic, but not unique

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. "Unique" is not a criteria used to evaluate prospective acquisitions. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Mike Kilpatrick

Comment: (#520) Grouse Mt. not unique enough to be a park

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. "Unique" is not a criteria used to evaluate prospective acquisitions. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Cici Brooks

Comment: (#525) The property and mansion will be used for an exclusive "Governor's Hunt"

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that there is absolutely no basis for this assertion. The property and main building will be used for public benefit as determined through a public planning and local land use processes.

Commenter name: Danny Meilicke

Comment: (#528) Grant Co. doesn't have many large-scale parks

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: Mike Kilpatrick

Comment: (#345) Grouse Mt. will require a lot of management, especially with weeds.

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes all park properties require management.

Commenter name: Oregon Coast Alliance

Comment: (#537) Grouse Mt. adjacent to former asbestos mine, which could impact land to be purchased - potential dangers, high costs for removal and restoration

Response: This issue does not relate to the commission's consideration of the proposal's overwhelming public benefit to the state park system. The former asbestos mine on adjacent property is closed and remains remote from any potential exposure from park users. OPRD will work with regulatory agencies to insure the site doesn't interfere with anticipated park visitors.

Commenter name: Mike Kilpatrick

Comment: (#339) Nothing outstanding about Grouse Mt. to make it a state park

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that "outstanding" is a matter of judgment, and that considering the lands already protected by the state park system, there is very little land of the scale and quality of Grouse Mountain in its portfolio.

Commenter name: Sharon Livingstone

Comment: (#518) Grouse Mt. has no unique benefits

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. "Uniqueness" is not a criteria for state park land acquisitions.

Commenter name: Cici Brooks

Comment: (#344) The current owner will not allow hunting after the property becomes a park.

Response: After the current owner sells the property, the state's public park planning process will dictate its use. There are no plans to include a deed restriction related to hunting in the final contract.

Commenter name: Oregon Coast Alliance

Comment: (#427) Grouse Mt. does not seem to be of significant natural, scenic, cultural, historic and recreation significance

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Shaun Robertson

Comment: (#423) Grouse Mt. acquisition does not meet statutory criteria for acquisition

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Cliff Bentz

Comment: (#455) Grant Co. will be hurt - taxes and fire suppression revenues

Response: The department will pay the Oregon Department of Forestry for fire coverage, so no private landowner's fire coverage bill should be affected by this land purchase. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Grant County Court

Comment: (#454) Private landowners in Grant Co. will pay more for fire protection

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the department will agree to fire coverage through the Oregon Department of Forestry.

Commenter name: Shaun Robertson

Comment: (#417) OPRD is not demonstrating prudent use of public resources

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that it has acted as directed by the commission in a diligent effort to fulfill its mission to provide Oregonians with opportunities for outdoor recreation.

Commenter name: Harriet Crum

Comment: (#439) Spending money on Grouse Mt. is a waste

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Grant Co. Stockgrowers

Comment: (#416) Recreation does not provide enough income or jobs to compensate for agricultural production loss

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. Studies show popular state parks do help local businesses and add jobs to the economy.

Commenter name: Cameron La Follette

Comment: (#458) The Grouse Mountain purchase has to be held to the "overwhelming public benefit" standard because it is part of the Bandon Exchange.

Response: The Grouse Mountain acquisition and the Bandon exchange would each survive if the other were halted. The "overwhelming public benefit" standard applies to exchanges, not acquisitions. The Grouse Mountain acquisition meets the requirements for acquisitions listed in Oregon Administrative Rule 736-019.

Commenter name: Mike Kilpatrick

Comment: (#422) Grouse Mt. acquisition does not meet legal standard to be a state park

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Mike Kilpatrick

Comment: (#451) OPRD has other options for offices and parks in Grant Co.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it will continue to improve the public property at Clyde Holliday, Kam Wah Chung and Bates.

Commenter name: Shaun Robertson

Comment: (#450) OPRD has other better opportunities in Grant Co. - expand Clyde Holliday

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it will continue to improve the public property at Clyde Holliday, Kam Wah Chung and Bates.

Commenter name: Ken Brooks

Comment: (#442) Other acquisition opportunities exist in Grant Co.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: John Morris

Comment: (#425) Grouse Mt. does not conform to statues of overwhelming public benefit or uniqueness

Response: The "overwhelming public benefit" standard applies to exchanges, not acquisitions. "Uniqueness" is not a criterion for acquisitions under Oregon Administrative Rule 736-019.

Commenter name: Grant Co. Public Forest Commission

Comment: (#426) Grouse Mt. does not meet OPRD acquisition criteria

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Gail Enright

Comment: (#507) Better management of Grouse Mt. would make the land more productive and environmentally sound without becoming a state park

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: Shaun Robertson

Comment: (#438) Purchase of the Grouse Mt. residence wastes precious acquisition funds

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes development of a community meeting space and environmental education center is one of several possible ideal uses for the property, and the existence of structures usable for this purpose improves the benefits of the purchase.

Commenter name: Mary Burke

Comment: (#437) OPRD needs to demonstrate overwhelming public benefit

Response: The "overwhelming public benefit" standard applies to exchanges, not acquisitions. The acquisition meets the requirements for acquisitions listed in Oregon Administrative Rule 736-019.

Commenter name: Oregon Coast Alliance

Comment: (#436) Grant Co. acquisition is not overwhelming public benefit

Response: The "overwhelming public benefit" standard applies to exchanges, not acquisitions. The acquisition meets the requirements for acquisitions listed in Oregon Administrative Rule 736-019.

Commenter name: Various Grant Co. citizens, local gov, buss

Comment: (#435) Exchange does not represent overwhelming public benefit

Response: The "overwhelming public benefit" standard applies to exchanges, not acquisitions. The acquisition meets the requirements for acquisitions listed in Oregon Administrative Rule 736-019.

Commenter name: Oregon Farm Bureau

Comment: (#461) Clarification needed on allowing hunting, compensating county for lost revenue and for how long, estimated visitation, impact of new traffic in the area, ongoing maintenance costs for the park

Response: The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court. Detailed information about proposed uses and effects on traffic are part of the public planning process. The plan has to be adopted in local land use ordinances by the county court.

Commenter name: Mary Ellen Brooks

Comment: (#430) Grouse Mt. State Park is not overwhelming public benefit

Response: The "overwhelming public benefit" standard applies to exchanges, not acquisitions. The acquisition meets the requirements for acquisitions listed in Oregon Administrative Rule 736-019.

Commenter name: Craig Herman

Comment: (#449) Adding more land to the department will require more tax dollars for support.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it is not funded by tax dollars, and is preparing, at the direction of the commission's preliminary order, to address this issue with the county court in a legally binding manner with the county court.

Commenter name: Jim Seeley

Comment: (#415) Exchange lacks community support; OPRD should gain support or invest in a different project

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it has received comments from many people both for and against the acquisition.

Commenter name: Shaun Robertson

Comment: (#49) Acquisition does not comply with state policy

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule.

Commenter name: Shaun Robertson

Comment: (#50) Acquisition does not meet policy

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule.

Commenter name: Shaun Robertson

Comment: (#571) OPRD's declining revenues problem will only be exacerbated by the Grouse Mt. property acquisition

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes that since it is not funded by taxes, it has to continually disinvest in some areas and increase investments in others to create new opportunities for revenue.

Commenter name: Shaun Robertson

Comment: (#570) OPRD would compete with local governments and private citizens

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: Shaun Robertson

Comment: (#566) OPRD has failed to evaluate whether the proposed development would undermine prior and continued investments in education and recreation

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Shaun Robertson

Comment: (#565) OPRD has failed to demonstrate why the residence is necessary to conduct state business

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes development of a community meeting space and environmental education center is one of several possible ideal uses for the property, and the existence of structures usable for this purpose improves the benefits of the purchase.

Commenter name: Shaun Robertson

Comment: (#564) OPRD has failed to demonstrate why additional public lands and facilities are necessary

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes not all public recreation lands are created equal, and except for 176 acres in other state parks, very little of the public recreation land in Grant County is under local Oregon control. The 2013-2018 Statewide Comprehensive Outdoor Recreation Plan shows a moderate need for drive-in tent sites and soft surface trails in a region that includes Grant, Baker, Union and Wallowa counties.

Commenter name: Shaun Robertson

Comment: (#553) Opportunities exist to expand current state parks in Grant Co.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it will continue to operate and improve other Grant County state parks as part of a statewide system.

Commenter name: Gail Enright

Comment: (#515) OPRD would have to invest significant funds to get Grouse Mt. ready to be a park

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department accepts there will eventually be development costs, and it will work within its statewide budget to invest prudently because it feels the property fulfills its mission. The investments will happen over time, and only after a public planning process.

Commenter name: Craig Herman

Comment: (#514) Additional lands require more money to manage

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department accepts there will eventually be development costs, and it will work within its statewide budget to invest prudently because it feels the property fulfills its mission. The investments will happen over time, and only after a public planning process.

Commenter name: Grant Co. Public Forest Commission

Comment: (#510) Concerns about ongoing management costs for large new park

Response: This is a valid concern. The state park system is not supported by taxes, and needs to establish parks which can generate revenue to offset some of its costs. The quality of this property, its suitability for camping, and existing buildings usable for rent to the public make it more likely the property will generate revenue.

Commenter name: Dan Williams

Comment: (#505) OPRD has large parks in Grant Co.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes there are 176 acres of state park property in the county.

Commenter name: Grant Co. Stockgrowers and Farm Bureau

Comment: (#506) Significant number of Grant Co. residents and landowners oppose exchange

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it has received comments from many people both for and against the acquisition.

Commenter name: Various Grant Co. citizens, local gov, buss

Comment: (#462) Projected loss to Grant Co. is \$7.5m and OPRD should pay that

Response: The department does not agree a figure has been reasonably calculated. While this concern isn't directed to a criterion in rule related to acquisitions, the department, at the direction of the commission's preliminary order, is prepared to address this issue of payments to Grant County in a legally binding manner.

Commenter name: Dan Williams

Comment: (#504) Manage existing properties before you acquire large new ones

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes Clyde Holliday will continue to operate and improve, but it cannot support the same level and type of use as a larger destination park.

Commenter name: Oregon Coast Alliance

Comment: (#485) Grant Co. acquisition will negatively impact county tax revenue and affect county services

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Sherilyn Webb

Comment: (#483) The state should address concerns for tax issues and sensible stewardship of the land

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Grant Co. Stockgrowers

Comment: (#476) Grant Co. will suffer - taxes, fire suppression, services

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Gail Enright

Comment: (#475) Grant Co. will lose tax revenue

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Dave Kruse

Comment: (#474) Grant Co. should get compensated for losing tax revenue - hunting fee in the park to go to county?

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Grant County Court

Comment: (#473) Exchange will negatively affect local gov in Grant Co.

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Oregon Cattlemen's Association

Comment: (#471) Concerns with managing Grouse Mt, offsetting county tax loss, finding the resources to manage land in the future, offsetting unintended consequences from taking land out of agricultural production

Response: The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Shaun Robertson

Comment: (#469) Acquisition will negatively impact tax revenue and agricultural operations

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Craig Herman

Comment: (#464) Grant Co. will lose tax revenue and available public land

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Oregon Farm Bureau

Comment: (#463) Concerns with OPRD's water rights, specific use of Grouse Mt, buildings to be built, land to be leased to farmers and price

Response: The department, at the direction of the commission's preliminary order, is prepared to address these issues in a legally binding manner in cooperation with the county.

Commenter name: Harriet Crum

Comment: (#470) Concerned about the effects on tax revenue

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Sharon Waterman

Comment: (#362) OPRD does not need to manage another large park

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes that since it is not funded by taxes, it has to continually disinvest in some areas and increase investments in others to create opportunities for revenue.

Commenter name: Cliff Bentz

Comment: (#414) Grouse Mt. acquisition would damage Grant Co. economy

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. Studies show popular state parks do help local businesses and add jobs to the economy.

Commenter name: Harriet Crum

Comment: (#396) Grouse Mt. St. Park does not have local support

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it has received comments from many people both for and against the acquisition.

Commenter name: Oregon Cattlemen's Association

Comment: (#355) OPRD should invest in current parks rather than create new ones

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. A new destination park will generate some of the revenue needed to operate and maintain the property, and it will continue to operate and improve other Grant County state parks as part of a statewide system.

Commenter name: Ken Brooks

Comment: (#375) Population growth will require more food and thus more agricultural land

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Grant Co. Stockgrowers

Comment: (#376) Turning private land public increases pressure on agricultural landowners

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Craig Herman

Comment: (#359) OPRD doesn't manage its current lands well.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. If there are specific problems, they should be handled specifically.

Commenter name: Various Grant Co. citizens, local gov, buss

Comment: (#368) Grant Co. needs to increase, not reduce productive land

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: John Morris

Comment: (#380) Concerns with true value of property, costs for weed control, business plan, return on investment

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes appraisals will set the market value, and that since it is not funded by taxes, it has to continually disinvest in some areas and increase investments in others to create opportunities for revenue.

Commenter name: Craig Herman

Comment: (#371) Grouse Mt. should remain in private hands because agriculture is vital to Grant Co.

Response: Most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. Other public lands in the county are used for livestock, so changing ownership doesn't always mean losing productivity.

Commenter name: Ken Brooks

Comment: (#373) Highest and best use for agricultural land is food production

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Grant Co. Public Forest Commission

Comment: (#382) Less land available for the cattle industry

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Oregon Farm Bureau

Comment: (#398) Exchange removes land from agriculture natural resource use, lacks local support

Response: Some members of the community support it, and some oppose it. Most proposals never earn unanimous support. Most of the land is not currently being used for agriculture, and future management will may include agricultural leases and forest thinning for health purposes in a vein similar to current operations.

Commenter name: Ken Brooks

Comment: (#363) Public funds should go to improving existing state parks

Response: Most of the department's operational budget does fund existing parks. A small proportion is invested in new opportunities.

Commenter name: Oregon Farm Bureau

Comment: (#364) Exchange removes land from agriculture & ranchers have difficulty finding grazing land

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Oregon Cattlemen's Association

Comment: (#391) Public funds are decreasing; thus, managing more land is not sustainable

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. A new destination park will generate some of the revenue needed to operate and maintain the property.

Commenter name: Grant Co. Public Forest Commission

Comment: (#390) Widespread opposition in Grant

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it has received comments from many people both for and against the acquisition.

Commenter name: Ken Brooks

Comment: (#389) Public opposition outweighs support for acquisition

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it has received comments from many people both for and against the acquisition.

Commenter name: Grant County Farm Bureau

Comment: (#365) Exchange will have a negative impact on agriculture and citizens of Grant Co.

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Dan Driscoll

Comment: (#366) Grant Co can't lose more agricultural land

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Sharon Livingstone

Comment: (#367) Grant Co. needs grazing land

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Oregon Farm Bureau

Comment: (#386) OPRD has not sought approval from Grant Co. Commissioners

Response: This concern isn't directed to a criterion in rule related to acquisitions, but the department understands the concern being raised. The department, at the direction of the Oregon State Parks and Recreation Commission's preliminary order, is addressing this issue with the county.

Commenter name: Mike Kilpatrick

Comment: (#385) State is empire building and will acquire more ranches

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition, but the department handles each property acquisition on a case-by-case basis, and has no properties similar to Grouse Mountain on its current priority list.

Commenter name: Shaun Robertson

Comment: (#381) Acquisition removes valuable land pasture

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Oregon Coast Alliance

Comment: (#406) Grant Co. needs to keep land private

Response: Some public lands provide direct benefits to private businesses and landowners. Public land owned by Oregonians and managed by an agency accountable to Oregon citizens and elected officials tends to provide more of these benefits than other kinds of public land.

Commenter name: Cici Brooks

Comment: (#413) There are no economic benefits to the county.

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. Studies show popular state parks do help local businesses and add jobs to the economy.

Commenter name: Craig Herman

Comment: (#412) Increase in publicly owned land reduces the tax base and doesn't add jobs.

Response: Studies show popular state parks do add jobs to the economy, and until a park campground opens, the department will pay in-lieu taxes.

Commenter name: Mary Ellen Brooks

Comment: (#411) Private land should not be taken out of tax base

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Gail Enright

Comment: (#370) Grouse Mt. should remain in private hands because agriculture is vital to Grant Co.

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Oregon Cattlemen's Association

Comment: (#369) Grouse Mt. acquisition promises tighter food supply, reduced economic benefit to the state, and increased financial responsibility

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that since most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations, no information has been provided to support these assertions.

Commenter name: Shannon Rust

Comment: (#410) Private land should not be taken out of tax base

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Harriet Crum

Comment: (#409) Other opportunities in the area exist

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: Scott Myers

Comment: (#347) Other opportunities in the area exists: expand Holliday St. Park

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes Clyde Holliday will continue to operate and improve, but it cannot support the same level and type of use as a larger destination park.

Commenter name: Oregon Cattlemen's Association

Comment: (#374) Losing an operational ranch will be detrimental to the county economy

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. The type of land use possible on a piece of land is dictated by zoning, not by the type of ownership.

Commenter name: Grant Co. Public Forest Commission

Comment: (#407) Grant Co. needs to keep land private

Response: Some public lands provide direct benefits to private businesses and landowners. Public land owned by Oregonians and managed by an agency accountable to Oregon citizens and elected officials tends to provide more of these benefits than other kinds of public land.

Commenter name: Grant Co. Stockgrowers

Comment: (#361) OPRD can barely maintain current properties

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. If there are specific problems, they should be handled specifically.

Commenter name: Grant Co. Stockgrowers

Comment: (#405) Grant Co. has enough public land

Response: Some public lands provide direct benefits to private businesses and landowners. Public land owned by Oregonians and managed by an agency accountable to Oregon citizens and elected officials tends to provide more of these benefits than other kinds of public land. Until a park campground opens, the department will pay in-lieu taxes or some other form of payment as will be explained in a legally-binding manner.

Commenter name: Mary Ellen Brooks

Comment: (#404) Grant Co. has enough public land

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: Dan Williams

Comment: (#403) Grant Co. has enough public land

Response: Some public lands provide direct benefits to private businesses and landowners. Public land owned by Oregonians and managed by an agency accountable to Oregon citizens and elected officials tends to provide more of these benefits than other kinds of public land.

Commenter name: Grant Co. Stockgrowers

Comment: (#348) Acquiring and maintaining a new park costs money & state gov. has a shortage

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes that since it is not funded by taxes, it has to continually disinvest in some areas and increase investments in others to create opportunities for revenue.

Commenter name: Various Grant Co. citizens, local gov, buss

Comment: (#402) Grant Co. has enough public land

Response: Some public lands provide direct benefits to private businesses and landowners. Public land owned by Oregonians and managed by an agency accountable to Oregon citizens and elected officials tends to provide more of these benefits than other kinds of public land.

Commenter name: Oregon Coast Alliance

Comment: (#349) Acquisition will likely draw resources away from other Grant Co. parcels

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern. A new destination park will generate some of the revenue needed to operate and maintain the property, and it will continue to operate and improve other Grant County state parks as part of a statewide system.

Commenter name: Sharon Waterman

Comment: (#372) Grouse Mt. should remain in private hands because agriculture is vital to Grant Co.

Response: Most of the land is not currently being used for agriculture, and future management will include agricultural leases and forest thinning for health purposes in a vein similar to current operations. Other public lands in the county are used for livestock, so changing ownership doesn't always mean losing productivity.

Commenter name: Melissa Brooks

Comment: (#401) Grant Co. has enough public land

Response: Some public lands provide direct benefits to private businesses and landowners. Public land owned by Oregonians and managed by an agency accountable to Oregon citizens and elected officials tends to provide more of these benefits than other kinds of public land.

Commenter name: Ken Holliday

Comment: (#400) Grant Co. has enough public land

Response: Some public lands provide direct benefits to private businesses and landowners. Public land owned by Oregonians and managed by an agency accountable to Oregon citizens and elected officials tends to provide more of these benefits than other kinds of public land.

Commenter name: Jack Johns

Comment: (#351) If the purchase has to be phased and consequently creates an inholding, it's too expensive.

Response: The need for phasing is not a criteria for measuring whether an individual acquisition is "too expensive." Several large transactions in modern times have been phased due to the characteristics of the state budget process. The department notes that as planned, phasing will not occur, but it is an available tool if necessary.

Commenter name: Sharon Livingstone

Comment: (#408) Grant Co. will lose tax revenue and available public land & country is suffering

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Shaun W Robertson

Comment: (#486) The commission motion should redact the phrase "if possible" in reference to an agreement with the county.

Response: The phrase "if possible" was not intended to cast doubt on whether an agreement would be reached, but only whether it would be final by the February 2014 commission meeting date.

Commenter name: Ken Brooks

Comment: (#484) There aren't enough concrete assurances from the department.

Response: The department does not agree this is an issue. While this concern isn't directed to a criterion in rule related to acquisitions, the department, at the direction of the commission's preliminary order, is prepared to address the county's issues in a legally binding manner, and if the property is acquired, the department will engage in a public planning process to specify how the park will be designed.

Commenter name: Shaun W Robertson

Comment: (#490) Testimony from Grant County officials Myers and Labhart should be removed from the record or annotated as being personal, since they were contrary to the county court's position.

Response: The record stands as it was presented. If county officials wish to add to their testimony at any future meeting, they are welcome to do so.

Commenter name: Cici Brooks

Comment: (#491) The county judge wasn't speaking for the court when he expressed his support for the project.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes the commission record stands as it was presented. If county officials wish to add to their testimony at any future meeting, they are welcome to do so.

Commenter name: Ken Holliday

Comment: (#357) Acquisition does not meet policy, creates hardship (tax), unfair competition

Response: Grouse Mountain does meet the agency's acquisition criteria, and the department will form an agreement with the county to address the loss of tax revenue. Fairness is subjective, and the department has been assigned a duty by Oregonians statewide to improve the state park system.

Commenter name: Ken Brooks

Comment: (#618) The project could create an unacceptable inholding.

Response: Phase 2 with the house is on the northern edge of the main parcel, not an in-holding. The intent is to acquire all the property. In the event we cannot, the main parcel provides sufficient land and amenities to provide a large-scale park.

Commenter name: Oregon Coast Alliance

Comment: (#338) Acquiring a property with financial liability does not credibly meet the "lost opportunity" criterion

Response: "Opportunity" does not mean "free of cost." Because the department prefers to acquire new public parks from willing sellers, it must take advantage of those opportunities when they arise.

Commenter name: Shaun Robertson

Comment: (#567) OPRD has not addressed how current needs that may be served with a new state park are not being satisfied

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes not all public recreation lands are created equal, and except for 176 acres in other state parks, very little of the public recreation land in Grant County is under local Oregon control. The 2013-2018 Statewide Comprehensive Outdoor Recreation Plan shows a moderate need for drive-in tent sites and soft surface trails in a region that includes Grant, Baker, Union and Wallowa counties.

Commenter name: Oregon Coast Alliance

Comment: (#346) Exchange initiated by private party, not OPRD

Response: Because the department purchases land from willing sellers, nearly every property acquisition starts when the private land owner calls. If department staff and the commission review the request and decide the property is worthwhile, the project becomes internally-driven and is handled as a standard acquisition. That's what happened with Grouse Mountain.

Commenter name: Shaun W Robertson

Comment: (#350) Grant County commissioners aren't ag producers and cannot necessarily represent those interests in negotiating the agreement, so the agreement should include other opponent groups.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes County elected representatives are the only accountable public entity available; the department will seek involvement by agricultural representatives in writing terms of an agreement, but the agreement will be signed by the two public bodies.

Commenter name: Jack Johns

Comment: (#472) Concessions are only proposed, not guaranteed.

Response: The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Shaun Robertson

Comment: (#512) OPRD should have asked for a written environmental review

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this requirement applies to proponents of exchanges proposed by outside parties. Grouse Mountain is an acquisition supported internally by staff.

Commenter name: Ken Brooks

Comment: (#356) Grant Co. government opposes acquisition

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition, but the department notes a majority of the Grant County Court has expressed a willingness to cooperate on an agreement that will make the acquisition acceptable.

Commenter name: Ken Brooks

Comment: (#492) The county judge wasn't speaking for the court when he expressed his support for the project.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes the commission record stands as it was presented. If county officials wish to add to their testimony at any future meeting, they are welcome to do so.

Commenter name: Cameron La Follette

Comment: (#353) The department has already made an ir retrievable commitment to purchase the property before the commission's final action.

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the purchase and sale agreement is, and always has been, explicitly contingent on commission approval. Without the commission's approval, the department loses earnest money, but is not compelled to purchase the property.

Commenter name: Bruce Barbarasch

Comment: (#360) Find new ways to acquire Grouse Mt. property

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes when budgets are strained, it would be imprudent not to use every available means to extend funds, including the methods encompassed by the

Commenter name: Roberta Stewart

Comment: (#509) Grouse Mt. acquisition should be independent of BSNA

Response: They are separate. Each could survive the failure of the other.

Commenter name: Ken Brooks

Comment: (#508) Commission should separate the Bandon transaction from the Grouse Mt. one

Response: They are separate. Each could survive the failure of the other.

Commenter name: Cliff Bentz

Comment: (#502) Need public hearings and a good management plan

Response: The department agrees this is important. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the state park comprehensive planning process is sufficiently detailed, thorough and public to satisfy this need.

Commenter name: Jack Johns

Comment: (#493) The county judge wasn't speaking for the court when he expressed his support for the project.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes the commission record stands as it was presented. If county officials wish to add to their testimony at any future meeting, they are welcome to do so.

Commenter name: Cici Brooks

Comment: (#522) Allowing the owner to retain the house creates an inholding, which could happen if the commission doesn't fund the Phase 2 purchase.

Response: Phase 2 with the house is on the northern edge of the main parcel, not an in-holding. The intent is to acquire all the property. In the event we cannot, the main parcel provides sufficient land and amenities to provide a large-scale park.

Commenter name: Shaun W Robertson

Comment: (#460) Construct an agreement with Grant County that is as measurable and enforceable as the real estate contract.

Response: The nature of the signed document will be determined through mutual agreement with county representatives.

Commenter name: Shaun Robertson

Comment: (#399) OPRD has not obtained a conditional use permit or permit for the division of land

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. There is a process in state law for development and approval of a state park master plan, and the department will follow it at the appropriate time if the acquisition is completed. No land division is proposed.

Commenter name: Oregon Coast Alliance

Comment: (#434) Grant Co. acquisition not on OPRD's acquisition plan 2007-2013; thus, not of significant value

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The commission adopted Grouse Mountain as a 2013-2015 acquisition priority in July 2013.

Commenter name: Shaun Robertson

Comment: (#444) Leases are unworkable

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: Grant County Court

Comment: (#445) Not enough public comment

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the department has been taking public comment for more than six months and has amassed hundreds of pages of reactions and several hours of in-person testimony.

Commenter name: Shaun W Robertson

Comment: (#446) Show measurable conclusions that Grouse Mountain will contribute to tourism traffic, or state this is only an opinion.

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department has not conducted a market study because the intended, specific uses of the property have not been planned. Plans must be created through a public process, and the department doesn't activate that process for properties it doesn't own. In its judgment, based on operating a state park system for the past 92 years, building a new destination park will attract more visitors to the area.

Commenter name: Shaun Robertson

Comment: (#447) OPRD has ignored public testimony against the acquisition

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the department has responded to people who oppose the project through meetings, website publishing and email. The department notes that it may not agree with every public comment made, but it has not ignored them.

Commenter name: Shaun Robertson

Comment: (#448) OPRD has not addressed the concerns of opponents

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it has responded to people who oppose the project through meetings, website publishing and email.

Commenter name: Ken Brooks

Comment: (#433) Misrepresentations to the Commission

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that it has acted based on the record and official background documents.

Commenter name: Lynne Leisy

Comment: (#395) Grant Co. residents oppose Grouse Mt. acquisition

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it has received comments from many people both for and against the acquisition.

Commenter name: Shaun Robertson

Comment: (#482) The state may not have the authority to address Grant Co. concerns

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Jack Johns

Comment: (#393) The project was kept secret too long.

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department notes that real estate negotiations are always accompanied by some degree of confidentiality, and proposals change frequently and significantly from one day to the next.

Commenter name: Jack Johns

Comment: (#392) The cost to operate and maintain the park hasn't been addressed.

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. Public planning has to precede development of a budget, but the estimated annual cost to maintain the undeveloped property is about \$50,000.

Commenter name: Shaun Robertson

Comment: (#440) OPRD has not demonstrated the acquisition meets tourism needs identified in the Grant Co. comprehensive plan

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes the county's 1996 comprehensive plan says "Promote County geology as a tourist-recreation base;" Among the attractions noted in the natural resource review is the presence of serpentine rock formations. While not unique to the region, state parks do not currently encompass this feature, and the property's geology would be addressed through the interpretive portion of a public plan for the park.

Commenter name: Cameron La Follette

Comment: (#459) Grant County does not support the deal, so it violates OPRD administrative rules.

Response: The Grouse Mountain purchase is contingent on an agreement with the county either in hand or substantially underway by the February commission meeting. The department notes a majority of the Grant County Court has expressed a willingness to cooperate on an agreement that will make the acquisition acceptable.

Commenter name: Mike Kilpatrick

Comment: (#384) OPRD has not consulted with neighbors

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department continues to speak with its prospective neighbors, though it has had trouble reaching landowners who reside outside the region in a timely way.

Commenter name: Shaun Robertson

Comment: (#418) OPRD has not demonstrated there is a need for public open space in Grant Co.

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes not all public recreation lands are created equal, and except for 176 acres in other state parks, very little of the public recreation land in Grant County is under local Oregon control. The 2013-2018 Statewide Comprehensive Outdoor Recreation Plan shows a moderate need for drive-in tent sites and soft surface trails in a region that includes Grant, Baker, Union and Wallowa counties.

Commenter name: Shaun Robertson

Comment: (#480) Proposal doesn't address all the country's substantive issues

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Scott Myers

Comment: (#479) OPRD has not addressed concerns - zoning implications, water rights,

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Ken Brooks

Comment: (#424) Grouse Mt. acquisition should be evaluated on its own for public benefit

Response: Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule.

Commenter name: Shaun Robertson

Comment: (#421) Acquisition is not of outstanding significance

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule. The department notes that considering the lands already protected by the state park system, there is very little property of the scale and quality of Grouse Mountain in its portfolio, and it the professional judgment of its managers and planners, the property is outstanding.

Commenter name: Shaun Robertson

Comment: (#419) Acquisition does not comply with rules and policies

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule.

Commenter name: Shaun Robertson

Comment: (#420) Acquisition does not comply with rules

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule.

Commenter name: Ken Brooks

Comment: (#477) No concrete pledge to address tax loss to Grant Co.

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Shaun W Robertson

Comment: (#431) Show how this meets the administrative rules for standard acquisitions.

Response: Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that this acquisition meets one or more of the acquisition criteria listed in rule.

Commenter name: Shaun Robertson

Comment: (#379) There are no guaranteed outcomes; state may not have authority to deliver on some issues

Response: This concern isn't directed to a criterion in rule related to acquisitions, but the department understands the concern. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Mary Burke

Comment: (#467) OPRD needs to more clearly show intended use

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The general intentions for camping, trails and a community meeting space/environmental education center have been outlined in public materials, detailed recommendations can only be developed during a public planning process that would start if the acquisition is approved.

Commenter name: Oregon Farm Bureau

Comment: (#383) OPRD has not established a need for more access points or public lands in Grant Co.

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes not all public recreation lands are created equal, and except for 176 acres in other state parks, very little of the public recreation land in Grant County is under local Oregon control. The 2013-2018 Statewide Comprehensive Outdoor Recreation Plan shows a moderate need for drive-in tent sites and soft surface trails in a region that includes Grant, Baker, Union and Wallowa counties.

Commenter name: Phillip Nemrava

Comment: (#397) Suspicious of land exchange

Response: Some members of the community support it, and some oppose it. Most proposals never earn unanimous support.

Commenter name: Shaun Robertson

Comment: (#539) Grouse Mt. has several structures

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition.

Commenter name: Mike Kilpatrick

Comment: (#559) Opposes Grouse Mt. St. Park

Response:

Commenter name: Oregon Farm Bureau

Comment: (#343) Opposes land exchange unless more clarification is provided

Response: Additional information is constantly being developed, and an understanding with the county on many points of contention will be presented to the parks commission.

Commenter name: Shaun Robertson

Comment: (#555) Opposes Grouse Mt. St. Park

Response:

Commenter name: Mary Burke

Comment: (#557) Opposes Grouse Mt. St. Park

Response:

Commenter name: Oregon Cattlemen's Association

Comment: (#558) Opposes Grouse Mt. St. Park

Response:

Commenter name: Gail Enright

Comment: (#554) Opposes Grouse Mt. St. Park

Response:

Commenter name: Grant County Farm Bureau

Comment: (#560) Opposes Grouse Mt. St. Park

Response:

Commenter name: Shaun Robertson

Comment: (#561) Opposes Grouse Mt. St. Park

Response:

Commenter name: Various Grant Co. citizens, local gov, buss

Comment: (#562) Opposes land exchange

Response:

Commenter name: Ken Brooks

Comment: (#341) Grant Co already has education center

Response: The department acknowledges this concern, but this issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes a natural resource-based education center operated in cooperation with a school district or university will benefit both the park system and the county.

Commenter name: Ken Brooks

Comment: (#441) Restoration is going to be expensive

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes the current owner has already invested substantially in restoration, and the department is committed to continuing to fund improvements.

Commenter name: Jack Johns

Comment: (#478) Opposition from agricultural interests haven't been addressed.

Response: The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Ken Brooks

Comment: (#452) Fire risk adds financial liability to the state

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the department will agree to fire coverage through the Oregon Department of Forestry.

Commenter name: Grant Co. Public Forest Commission

Comment: (#453) Less private land means higher individual fire patrol contributions for current land owners

Response: The department does not agree. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the department will agree to fire coverage through the Oregon Department of Forestry.

Commenter name: Ken Brooks

Comment: (#388) OPRD continues to promote the project even though most local people are against it.

Response: The department does not agree this is an issue. Based on the proposed order submitted to the Commission for its February 2014 meeting, the department recommends that the commission find that the department has received comments from many people both for and against the acquisition, and that it has acted in accordance with the commission's direction to resolve issues associated with the acquisition.

Commenter name: Ken Brooks

Comment: (#556) Opposes Grouse Mt. St. Park

Response:

Commenter name: Dan Driscoll

Comment: (#354) OPRD & County can find a different site and improve existing parks

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. A new destination park will generate some of the revenue needed to operate and maintain the property, and it will continue to operate and improve other Grant County state parks as part of a statewide system.

Commenter name: William P. Russell

Comment: (#394) Wait on Grouse Mt. purchase

Response: Since it purchases property from willing sellers, some opportunities must be seized when they appear.

Commenter name: Various Grant Co. citizens, local gov, buss

Comment: (#443) OPRD has not fulfilled park commitments in the area

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. If there are specific problems, they should be handled specifically.

Commenter name: Mike Kilpatrick

Comment: (#358) State is not a good neighbor

Response: If there are specific problems between OPRD and a neighbor, they should be handled specifically.

Commenter name: Grant Co. Public Forest Commission

Comment: (#465) Grant Co. does not need promises that public land will be turned private in the future

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department understands the concern being raised. The department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Shaun Robertson

Comment: (#387) Acquisition opponents outweigh supporters

Response: This issue is not among the criteria considered by the commission when evaluating an acquisition. The department notes it has received comments from many people both for and against the acquisition.

Type of comment: n/a

Commenter name: Danny Meilicke

Comment: (#496) Opposes transfer of any ODFW wildlife areas in Grant Co, esp. the Philip W. Scheider Wildlife Area

Response: The Scheider Wildlife Area is not involved in the acquisition.

Commenter name: Rod Adams

Comment: (#497) Opposes transfer of any ODFW wildlife areas in Grant Co, esp. the Philip W. Scheider Wildlife Area

Response: The Scheider Wildlife Area is not involved in the acquisition.

Commenter name: Rich Shepard

Comment: (#498) Opposes transfer of any ODFW wildlife areas in Grant Co, esp. the Philip W. Scheider Wildlife Area

Response: The Scheider Wildlife Area is not involved in the acquisition.

Commenter name: Matt Parrish

Comment: (#500) Opposes transfer of any ODFW wildlife areas in Grant Co, esp. the Philip W. Scheider Wildlife Area

Response: The Scheider Wildlife Area is not involved in the acquisition.

Commenter name: Robert Dixon

Comment: (#501) Opposes transfer of any ODFW wildlife areas in Grant Co, esp. the Philip W. Scheider Wildlife Area

Response: The Scheider Wildlife Area is not involved in the acquisition.

Commenter name: Jon Weber

Comment: (#499) Opposes transfer of any ODFW wildlife areas in Grant Co, esp. the Philip W. Scheider Wildlife Area

Response: The Scheider Wildlife Area is not involved in the acquisition.

Commenter name: Sale Sauer

Comment: (#495) Opposes transfer of any ODFW wildlife areas in Grant Co, esp. the Philip W. Scheider Wildlife Area

Response: The Scheider Wildlife Area is not involved in the acquisition.

Commenter name: Greg Mead

Comment: (#494) Opposes transfer of any ODFW wildlife areas in Grant Co, esp. the Philip W. Scheider Wildlife Area

Response: The Scheider Wildlife Area is not involved in the acquisition.

Type of comment: Pro

Commenter name: Carol Faulkner

Comment: (#551) National forest trails are currently inaccessible during winter

Response:

Commenter name:

Comment: (#598) Supports Grouse Mt. St. Park - hunting, wildlife mgmt.

Response:

Commenter name: Randy Becker

Comment: (#597) Supports Grouse Mt. St. Park - hunting, wildlife mgmt.

Response:

Commenter name: Ron Makinson

Comment: (#596) Supports Grouse Mt. St. Park - hunting, wildlife mgmt.

Response:

Commenter name:

Comment: (#595) Supports Grouse Mt. St. Park - hunting, wildlife mgmt.

Response:

Commenter name: Steve Freilinger

Comment: (#594) Supports Grouse Mt. St. Park - hunting, wildlife mgmt.

Response:

Commenter name: Marty Point

Comment: (#593) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Carol Faulkner

Comment: (#578) State parks in the area too small for hiking and biking Response:

Commenter name: Joe Ricker

Comment: (#599) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Mark Weitz

Comment: (#592) Supports Grouse Mt. St. Park - hunting & fishing Response:

Commenter name: Eastern Oregon Professional Services

Comment: (#568) OPRD has successfully controlled weeds in other parks, so they will do it at Grouse Mt. too Response:

Commenter name: Eastern Oregon Professional Services

Comment: (#540) Grouse Mt. is outstanding Response:

Commenter name: Ken F

Comment: (#617) Supports land swap - hunting Response:

Commenter name: Robert Dixon

Comment: (#609) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Matt Parrish

Comment: (#608) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Jon Weber

Comment: (#607) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Greg Mead

Comment: (#529) Grant Co. doesn't have many large-scale parks Response:

Commenter name: Rich Shepard

Comment: (#530) Grant Co. doesn't have many large-scale parks Response:

Commenter name: Jon Weber

Comment: (#531) Grant Co. doesn't have many large-scale parks Response:

Commenter name: Matt Parrish

Comment: (#532) Grant Co. doesn't have many large-scale parks Response:

Commenter name: Robert Dixon

Comment: (#533) Grant Co. doesn't have many large-scale parks Response:

Commenter name: Eastern Oregon Professional Services

Comment: (#534) Grant Co. needs more camping to accommodate overflow from Clyde Holliday St. Park Response:

Commenter name: Duane Dungannon

Comment: (#606) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Scott Cotter

Comment: (#511) Include Juniper Ridge Ranch in land swap - deer and elk viewing, diverse birds, great access for elderly and people w disability, potential for overnight camping, day hikes, etc. Response: This property is not currently on the department acquisition priority list.

Commenter name: Grant Co. Chamber of Commerce

Comment: (#538) Grouse Mt. has great potential for varied recreation Response:

Commenter name: Mike Dec

Comment: (#591) Supports Grouse Mt. St. Park - hunting Response:

Commenter name: Rena Bargsten

Comment: (#541) Grouse Mt. offers varied recreation opportunities Response:

Commenter name: Rod Adams

Comment: (#604) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Danny Meilicke

Comment: (#603) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Eastern Oregon Professional Services

Comment: (#544) Grouse Mt. St. Park will provide access to federal lands previously closed due to private property Response:

Commenter name: Mark Webb

Comment: (#602) Supports Grouse Mt. St. Park - hunting, wildlife mgmt. Response:

Commenter name: Sale Sauer

Comment: (#601) Supports Grouse Mt. St. Park - hunting, wildlife mgmt.

Response:

Commenter name: Greg Mead

Comment: (#600) Supports Grouse Mt. St. Park - hunting, wildlife mgmt.

Response:

Commenter name: Duane Dungannon

Comment: (#548) Hunting is important to local economy - tourism

Response:

Commenter name:

Comment: (#549) Hunting is legitimate recreation

Response:

Commenter name: Randy Becker

Comment: (#550) Hunting is legitimate recreation

Response:

Commenter name: Grant Co. Chamber of Commerce

Comment: (#552) New recreation opportunities will attract additional visitors and create positive economic impact

Response:

Commenter name: Rich Shepard

Comment: (#605) Supports Grouse Mt. St. Park - hunting, wildlife mgmt.

Response:

Commenter name: Mark Webb

Comment: (#574) Purchase has local support

Response:

Commenter name: Mike Dec

Comment: (#481) Tax revenue will decrease, but solve problem creatively - share park revenues or dedicate a surcharge?

Response: While this concern isn't directed to a criterion in rule related to acquisitions, the department, at the direction of the commission's preliminary order, is prepared to address this issue in a legally binding manner with the county court.

Commenter name: Sherilyn Webb

Comment: (#545) Grouse Mt. State Park is an opportunity to diversify local economy, create new jobs and bring new visitors

Response:

Commenter name: Joe Ricker

Comment: (#523) Benefits Grant Co. - new recreation opportunities; increased tourism

Response:

Commenter name: Duane Dungannon

Comment: (#524) Benefits of tourism should outweigh the reduced tax revenue

Response:

Commenter name: Susan Horn

Comment: (#526) Financial benefits of a new park will outweigh the lost tax revenue to Grant Co.

Response:

Commenter name: Eastern Oregon Professional Services

Comment: (#527) Grant Co. business owners need tourism Response:

Commenter name: Robert Dixon

Comment: (#535) Grant. Co. is not unique - other Eastern Or. counties have high percentage of public lands Response:

Commenter name: Eastern Oregon Professional Services

Comment: (#536) Grouse Co. St. Park will create a positive economic impact Response:

Commenter name: Mark Webb

Comment: (#576) Purchase will diversify Grant Co. economy Response:

Commenter name: Rena Bargsten

Comment: (#543) Grouse Mt. St. Park will increase tourism Response:

Commenter name:

Comment: (#546) Grouse Mt. State Park will benefit the local community Response:

Commenter name: Gray Grieve

Comment: (#547) Grouse Mt. will have more public use as a state park Response:

Commenter name: James Lowrie

Comment: (#521) Send payments in lieu of taxes to Grant County. Response: Until a park campground opens, the department will pay in-lieu taxes.

Commenter name: Susan Horn

Comment: (#573) Park visitors are good for local economy Response:

Commenter name: Mark Webb

Comment: (#575) Purchase will benefit area communities socially, economically and ecologically Response:

Commenter name: Jon Weber

Comment: (#340) Grant. Co. is not unique - other Eastern Or. Counties have high percentage of public lands

Commenter name: Eastern Oregon Professional Services

Comment: (#542) Grouse Mt. St. Park will create revenue greater than the tax lost Response:

Commenter name: Mark Webb

Comment: (#577) Purchase would be a good strategic move for OPRD Response:

Commenter name: Chris Labhart

Comment: (#525) Exchange good for Grant Co. Response:

Commenter name: James Lowrie

Comment: (#581) Supports acquisition of Grouse Mt. for hunting. Response:

Commenter name: Rich Shepard

Comment: (#582) Supports acquisition of Grouse Mt. for hunting. Response:

Commenter name: Grant Co. Chamber of Commerce

Comment: (#616) Supports Grouse Mt. State Park Response:

Commenter name: Carol Faulkner

Comment: (#615) Supports Grouse Mt. State Park Response:

Commenter name: Robert Watt

Comment: (#614) Supports Grouse Mt. State Park Response:

Commenter name:

Comment: (#613) Supports Grouse Mt. State Park Response:

Commenter name: Sherilyn Webb

Comment: (#612) Supports Grouse Mt. State Park Response:

Commenter name: Albert Farmer

Comment: (#610) Supports Grouse Mt. St. Park & preliminary approval Response:

Commenter name: Micheal Scalici

Comment: (#583) Supports exchange Response:

Commenter name: Susan Horn

Comment: (#563) OPRD has been a great neighbor Response:

Commenter name: Harold Laird

Comment: (#611) Supports Grouse Mt. St. Park & preliminary approval Response:

Commenter name: Grant Co. Chamber of Commerce

Comment: (#569) OPRD knows how to manage lands Response:

Commenter name: Juliette Jones

Comment: (#584) Supports exchange Response:

Commenter name: Jim and Kerri Latshaw

Comment: (#579) Support development of Grouse Mountain State Park Response:

Commenter name: George Meredith

Comment: (#590) Supports Grouse Mt. St. Park - good for the local economy, good recreation, good preservation Response:

Commenter name: Art Andrews

Comment: (#589) Supports Grouse Mt. St. Park Response:

Commenter name: Susan Horn

Comment: (#580) Supports acquisition of Grouse Mt. Response:

Commenter name: Rena Bargsten

Comment: (#588) Supports Grouse Mt. St. Park Response:

Commenter name: Tom Winters

Comment: (#587) Supports Grouse Mt. St. Park Response:

Commenter name: Erie Miller

Comment: (#586) Supports Grouse Mt. ranch sale Response:

Commenter name: Andrew Janssen

Comment: (#585) Supports exchange. Response:

Commenter name: Eastern Oregon Professional Services

Comment: (#572) Other state parks in Grant Co. have been positive influences on local communities in Grant Co. Response:

Property: Whale Cove

Type of comment: Con

Commenter name: Oregon Shores Conservation Coalition

Comment: (#619) If OPRD plans to acquire Whale Cove regardless, then Whale Cove should not be part of the trade Response: This is the best available method for guaranteeing money is available now to acquire Whale Cove.

Type of comment: Pro

Commenter name: Lynne Leisy

Comment: (#620) Whale Cove acquisition could be independent of BSNA proposal. Response: This is the best available method for guaranteeing money is available now to acquire Whale Cove.

Commenter name: William P. Russell

Comment: (#621) Buy Whale Cove Response:

Commenter name: David Hess

Comment: (#622) Whale Cove is special property that should be preserved for future Oregonians Response:

Commenter name: Sandra Kennedy

Comment: (#623) Whale Cove is special property that should be preserved for future Oregonians Response:

Commenter name: Oregon Shores Conservation Coalition

Comment: (#624) Whale Cove is valuable

Response:

Commenter name: Gray Grieve

Comment: (#625) Whale Cove will be protected

Response: