

Oregon Parks and Recreation Commission

November 20, 2013

Agenda Item: 6a

Action

Topic: Bandon Biota LLC Exchange

Presented by: Jim Morgan

Background:

In June 2013, Bandon Biota LLC submitted a proposal to Oregon Parks and Recreation Department (OPRD) outlining acquisition of a portion of Bandon State Natural Area in exchange for other property, cash and in-kind services. This was a culmination of efforts by the proposer to provide to the Commission a proposal that would conform to the department's land acquisition and exchange policy OAR 736-019-0070. This policy provides criteria for an exchange initiated by parties other than the department. In this instance, the Commission may approve an exchange if the Commission determines that the proposed exchange provides "overwhelming public benefit to the park system, its visitors, and the citizens of Oregon". The Commission has sole discretion to determine whether a proposal provides an overwhelming public benefit to the park system, its visitors, and citizens, which is resounding, clear and obvious.

Components of the proposal under consideration are outlined in Attachment A. In essence, the proposal would result in OPRD conveying fee title of 280 acres of the Bandon State Natural Area (Bandon SNA) to Bandon Biota LLC. In exchange, OPRD will receive:

- a 111-acre ocean shore land parcel adjacent to Bandon SNA,
- a 98-acre land parcel adjacent to Bullards Beach State Park,
- \$450,000 to be used for matching grant funds to protect Whale Cove,
- \$2.5 million for the acquisition of Grouse Mountain Ranch,
- \$300,000 for the control of gorse on State Parks properties, and
- A trail easement across Sheep Ranch, directly connecting a portion of the Oregon Coast Trail, and a trail easement on the southern portion of Bandon SNA being considered for conveyance to Bandon Biota.

OPRD first released an outline of the Bandon Biota exchange proposal on July 3, 2013 as part of the announcement for the State Parks Commission meeting held in Coos Bay. The Commission solicited public comment at the meeting, by email, and in writing. The two areas of the state most directly affected by the exchange – Bandon, because 280 acres of a local state natural area would leave the system, and Grant County, because more than 6,100 acres would leave private ownership and enter the system – requested additional public meetings and opportunities to comment. The department responded by holding a meeting in Bandon August 16, and one in Mount Vernon August 19. Combined, more than 100 people attended. Written comments continued to come in by email and regular mail. Background information – maps, acquisition priority decisions, high-level descriptions of the properties-were provided online, along with

notes from the meetings and the public comments, and are available at <http://www.oregon.gov/oprd/pages/commission-bandon.aspx> . A summary of the public comments and the department’s response is provided in Attachment C.

Since the first release of the exchange proposal, two alterations have been made:

- (1) The proposed northern and western boundaries of Bandon SNA portion considered for transferring out of the park system has been modified but the total acreage remains the same as the original proposal.
- (2) An additional trail easement will be granted to OPRD from Bandon Biota to protect the current public access in the southern portion of Bandon SNA.

The department’s land acquisition and exchange policy establishes the criteria for exchanges that are initiated by other parties. The Commission determines whether the proposed exchange provides an overwhelming public benefit to the park system. Criteria include, but are not limited to, whether the proposed exchange:

- Aligns with the department’s mission, strategies, objectives and work plan; or provide overwhelming public benefit
- Will accommodate public use and access, and be in the best interest of the department;
- Has support of local county and local communities;
- Evaluates natural and cultural resources assessment, impacts and protection;
- Provides one or more properties already identified in the department’s acquisition priority documents;
- Provides stewardship endowment.

While the department evaluates the exchange proposal and makes a recommendation to the Commission, the Commission has sole discretion to determine whether a proposal provides an overwhelming public benefit to the parks system, its visitors, and citizens. The Commission evaluates all contributions collectively, weighs against the property proposed to be transferred out of the park system, and then makes a determination.

A department evaluation of the proposed exchange using these criteria is summarized below.

	Criteria for evaluating exchange					
	Mission	Access	Local Support	Natural Resource Assessment	Acquisition Priority	endowment
Leaving park system						
Bandon SNA – 280 ac	n/a	yes	yes and no	yes	n/a	n/a
Coming into park system						
Ocean front - Bandon	yes	yes	yes	yes	yes	yes
Bullards Beach in-holding	yes	yes	yes	yes	yes	yes
Whale Cove	yes	no	yes	yes	yes	no

Coast trail easement	yes	yes	yes	yes	yes	no
Gorse control	yes	yes	yes	n/a	n/a	yes
Grouse Mtn.	yes	yes	yes and no	yes	yes	TBD

While there is general local support for the coastal properties and associated funds coming into the park system, there are citizens of Grant County both who support the acquisition of Grouse Mtn. and those who do not. Opposition has focused primarily on the acquisition of Grouse Mtn. and less on the total exchange components. The issues raised and the department’s efforts to address those issues are outlined in Attachment C.

In evaluating this proposed exchange, the exchange criteria focus on land exchanged for land, with other contributions such as cash being considered. For such proposals initiated by other parties where land is leaving the park system, the Commission expressed that the proposal should identify specific land coming into the park system for determining clear and obvious overwhelming public benefit. To that end, purchase and sale agreements for the in-coming lands being considered in the exchange have been secured to provide assurance to the Commission that if the exchange is approved, then the terms of the exchange agreement can be met.

Prior Action by Commission:

- September 22, 2010 - Bandon Biota presented initial exchange proposal
- July 20, 2011 – Bandon Biota provided public comments on proposal
- July 17, 2013 – Proposed exchange with Bandon Biota presented to Commission
- September 24, 2013 - Proposed Exchange with Bandon Biota - Public Comments

Action Requested: Staff recommends that the Commission:

1. Consider the exchange of property and other considerations contemplated in the Bandon Biota exchange as meeting the “overwhelming public benefit” standard of OAR 736-019-0070(4) and approve the exchange of 280 acres of Bandon State Natural Area in accordance with the purchase agreement as summarized in Attachment A.
2. Approve the acquisition of Grouse Mountain Ranch in accordance with terms of the purchase and sale agreement as summarized in Attachment B.
3. Instruct the Director to make every good faith effort to resolve local concerns related to recreation access, fiscal impacts, and natural resource management near Bandon State Natural Area and Grouse Mountain by carrying out the actions outlined in Attachment C.

- Attachments:** Attachment A: 2013 Bandon Biota Exchange Proposal
Attachment B: Grouse Mtn. Purchase Agreement Summary
Attachment C: 2013 Bandon Exchange - Public Comments and OPRD Response

Prepared by: Jim Morgan

Attachment A

2013 BANDON BIOTA EXCHANGE PROPOSAL

Bandon Biota has a proposed to Oregon Parks and Recreation Department (OPRD) regarding an exchange of real property and other considerations for a portion of Bandon State Natural Area owned and managed by OPRD. Components of the proposal are provided below.

Bandon Biota would receive:

- **Bandon State Natural Area**

Bandon Biota would receive 280 non-oceanfront acres of the 878-acre Bandon State Natural Area (SNA) to construct Bandon Links, a walking-only championship links municipal golf course. A public trail corridor would be preserved within the in the southern portion of Bandon SNA to maintain the current public trail use by an easement conveyed to OPRD. Access from the proposed golf course directly to the shore would be restricted. Bandon Biota will be responsible for satisfying all title encumbrances including the BLM deed restriction.

Bandon SNA is composed of stabilized and un-stabilized sand dunes forming ridges parallel to the ocean, separated by seasonally-flooded wetlands and dunal plant communities in troughs between the dunes. Native plant communities with rare elements are present in Bandon SNA, much of which is significantly impacted by gorse, a highly-invasive, noxious weed. A recently-completed botanical inventory of the proposed exchange and past site assessments is available on-line <http://www.oregon.gov/oprd/pages/commission-bandon.aspx> .

OPRD will receive:

- **Oceanfront Parcel**

OPRD will receive the 111-acre oceanfront parcel that adjoins the Bandon State Natural Area to the south and the west, with its westernmost boundary on the ocean shore. Bandon Biota will be granted a service road access easement from the nearest public road across easternmost portion. Approximately 45% of total property is foredunes covered in shore pine, Sitka spruce and gorse, interspersed with seasonal wetlands. The remaining western portion is bisected by the New River that separates the eastern uplands from the low beach dunes that are prone to the shifting river course and periodic storm overwash. A map of vegetation communities is on-line at the site referenced above.

- **Bullards Beach Spit Parcel**

OPRD will receive the 97-acre Bullards Beach Spit Parcel that is located along the west side of the Coquille River on the Bullards Beach spit, directly adjacent to Bullards Beach State Park. Incorporation this in-holding into the park will increase management efficiency and reduce trespass issues. A site assessment is available on-line at the address referenced above.

The upland portion (60% of total property) is stabilized sand flats and low dunes vegetated primarily by European beach grass and an expanding tree and shrub component. Scattered Scotch broom and gorse are the primary invasive plants of concern. The remaining property is primarily wetland in the form of deflation plains, tidal flats and land submerged by the Coquille River.

- **Whale Cove Parcels**

OPRD will facilitate government acquisition of 10.9 acres of property owned by a third party at Whale Cove near Depoe Bay. Bandon Biota will contribute up to \$450,000 in matching funds required to leverage a federal grant and landowner donation for acquisition of the Whale Cove property. Bandon Biota's contribution towards acquisition of the Whale Cove property is non-refundable and not contingent on completion of the rest of the exchange.

The Whale Cove parcels are comprised of coastal forest, prairie, and rocky headland near Depoe Bay. Whale Cove is the only marine area in Oregon's territorial sea where all marine life is protected. It is anticipated that the Whale Cove property will be integrated into the Oregon Coastal National Wildlife Refuge complex managed by the U.S. Fish and Wildlife Service. Acquiring the Whale Cove property will protect the viewshed from the Rocky Creek State Scenic Viewpoint and other viewpoints.

- **Grouse Mountain Ranch Parcels**

Bandon Biota will contribute \$2,500,000 toward the purchase price for OPRD's acquisition of the Grouse Mountain Ranch parcels. OPRD will purchase the 6,100-acre Grouse Mountain Ranch parcels in Grant County as an addition to the state park system.

The Grouse Mountain Ranch parcels are comprised of Ponderosa pine forest, bunchgrass prairie, and riparian bottomlands. Beech Creek, a tributary of the John Day River, and other streams on the property provide salmonid habitat. The property will provide significant natural resources, recreational, cultural and scenic value to the state park system. Existing infrastructure provides a basis for future development of a state park at a regional and state-wide level.

- **Gorse Control**

Bandon Biota will provide a minimum of \$300,000 to OPRD dedicated to gorse control on Bullards Beach State Park, the remaining Bandon State Natural Area, Cape Blanco State Park and the Floras Lake State Natural Area.

- **Oregon Coast Trail Realignment**

Bandon Biota will provide to OPRD an additional easement across the Sheep Ranch at Bandon Dunes to relocate a section of the Oregon Coast Trail with more direct alignment in accordance with OPRD trail standards.

Summary 2013 Bandon Biota Exchange Agreement

	Property	Acres	Natural Resources and Recreational Values	Actions	Conditions
Bandon Biota Benefits	Bandon SNA	280	Stable and unstable dunes, rare native plant associations, seasonal wetlands, gorse	fee title conveyed after Bandon Biota satisfies BLM deed restriction	Purchase & sale agreement signed; Need new appraisal; subject to public trail easement on southern portion
OPRD Benefits	Bandon Biota oceanfront property	111	~52 ac is upland with shore pine, spruce, gorse, wetlands; remaining is New River and ocean beach	Fee title to OPRD	New appraisal needed; subject to service road easement
	Bullards Beach in-holding	97	Improves management of Bullards Beach SP	Fee title to OPRD	New appraisal needed
	Whale Cove	11	Coastal forest and rocky headland; limited access	*\$450,000 for matching grant	Purchase & sale agreement pending; likely will become part of coastal wildlife refuge
	Coast Trail easement	n/a	Links existing coast trail sections	OPRD receives trail easement	Conceptual alignment proposed; final to be determined
	Gorse control on State Parks	n/a	Protects areas of high natural resource value; improves access; reduce wildfire risks	\$300,000	OPRD directs efforts where most needed
	Grouse Mtn.	6,100	Forested and open ridges, grass prairie, canyons, springs and streams, riparian bottomland; scenic vistas in park-like setting	\$2,500,000 toward acquisition	Purchase & sale agreement signed; appraisal in review
*Once agreement is signed, \$450,000 contribution toward Whale Cove is unconditional; remaining contributions are conditional to complete execution of exchange agreement.					

6a- Attachment B

Grouse Mountain Purchase Agreement Summary

Acquisition of the Grouse Mountain property is an acquisition priority for Oregon Parks and Recreation Department (OPRD) and the State Parks Commission. The owners of Grouse Mountain are willing sellers. A purchase and sale agreement has been developed to enable the acquisition of Grouse Mtn. pending Commission approval. Terms of the purchase and sale agreement are summarized below.

Property

The total Property considered for purchase and sale is approximately 6100 acres

Price.

The total payment amount for the Property will be \$4,500,000 ("Property Payment Amount". If the appraised value ("Property Purchase Price") equals or exceeds the "Property Payment Amount", then OPRD will pay the lesser amount.

Payment

At Closing, OPRD will either (i) pay \$2,500,000 in cash with a promissory note for the balance of the Property Payment Amount and a deed of trust over a portion of the Property, or (ii) finance the entire price through Seller with two promissory notes and three deeds of trust covering the entire Property, and with an agreement that if necessary funds are not budgeted for the balance of the price in the next biennium OPRD will re-convey a portion of the Property to the Seller (consisting of the ranch house and 695 acres around it).

Closing

Closing of the Property will take place on or before June 30, 2014. At Closing, OPRD will take title to the Property by warranty deed subject to the liens of the deed or deeds of trust. OPRD takes possession of the Property at Closing, except that Seller remains in possession of the ranch house until June 30, 2015 as caretaker and to protect its security interest.

6a - Attachment C

2013 Bandon Biota Exchange Proposal - Public Comments and OPRD Response

Public comments on the proposed 2013 Bandon Biota exchange were solicited and gathered from State Parks Commission meetings, public meetings, stakeholder meetings, e-mail and regular mail, and on-line response on the department’s web site. Provided below is a summary of comments and the department response to comments where appropriate.

I. Summary of Comments

Affected Property	From supporters	From those not supporting proposal
Bandon State Natural Area	<p>Converts unused land into economically productive land</p> <p>Incoming properties and resources to fight gorse are worth trading for a portion of Bandon SNA</p>	<p>Coastal land is too valuable to trade</p> <p>Insufficient knowledge of Bandon SNA to evaluate potential resource loss</p>
Ocean front parcel	Provides access to New River and shoreline from public road and trail	Habitat condition is not as good as what is being given away
Bullards Beach in-holding	Converts private in-holding to public land	The river will eventually take away most of this land.
Whale Cove	Special place worth protecting; significant marine life and scenic views.	Don’t know where it is.
Grouse Mountain	<p>A new park will give people more reasons to visit the area, extend their visit and contribute to improving the local economy.</p> <p>The current owner share similar conservation goals and thinks state parks is a good match</p>	<p>Too much land is already in public ownership; adding more will increase burden on county government and services.</p> <p>This acquisition does not meet acquisition criteria.</p> <p>Loss of agricultural land and water rights.</p> <p>Management cost is too high.</p>

II. Specific Comments and Concerns Addressed

Exchange as a Whole

Setting Precedent: *This is the first major exchange under the relatively-new acquisition policy, potentially setting the precedent for future exchanges.*

Response: The department and Commission are fully cognizant of this potential precedent, acting cautiously and deliberately, in an open and transparent way, in making sure such proposals do clearly provide an overwhelming public benefit to the park system.

Bandon State Natural Area

Coastal Land: *Coastal land is too valuable to trade.*

Response: While the proposed exchange will convey 280 acres of coastal land out of the park system and accept 219 acres of coastal land into the system, the habitat types and conditions are different in each. The proposed exchange has to be evaluated in total rather than limiting the evaluation to coastal properties.

Insufficient resource inventories: *Not enough is known about the portion of Bandon SNA to know what is being exchanged.*

Response: A biological assessment for the entire Bandon SNA was completed in 2007 and a more detailed, refined assessment of the 280-acre proposed exchange area was completed in 2013. While additional assessments would improve baseline knowledge of the site, these assessments adequately characterizes the significant plant communities and provides specific recommendations for future management as a natural area. A cultural resource assessment would be finalized prior to conveyance.

Grouse Mountain

Preservation of Water Right: *Will OPRD exercise water rights that accompany the proposed acquisition?*

Response: As a common practice, OPRD maintains and protects water rights associated with existing land holdings as well as newly-acquired properties. In the event Grouse Mtn. is acquired, OPRD would continue to utilize and protect surface water rights for irrigation of the hay fields along Beech Creek. Water rights in excess of OPRD needs would be considered for lease or sale to the private market.

Loss of tax revenue: *Transfer of land from private to public results in loss of tax revenue to the county and service districts.*

Response: Current taxes paid by the landowner of Grouse Mtn. to the county are approximately \$18,000/year. Approximately \$12,000/yr. is paid for the owner's house and surround lot and \$6,000/yr. is tax paid on the remaining land (approximately 6,100 acres). A portion of these taxes are directed to community services, such as fire protection, schools, libraries, cemeteries and parks. OPRD is committed to making sure those services associated with any future park are compensated; either directly through agreements negotiated with those service providers (i.e. fire protection) or indirectly through revenue generated from its operations. OPRD is committed to further discussions with the county to address this issue, including options such as in-lieu payments until the park is developed.

Loss of Private Land: Grant County does not need more public land.

Response: Approximately 64% of Grant County is owned by federal and state government. The 6,100-acre Grouse Mtn. comprises 0.6% of the private land base in Grant County. Though this may be relatively small portion of private land in the county, there is coordinated effort among state agencies to identify surplus state lands in Grant County and place those properties on the open market.

Potential Loss of Agricultural Land: The acquisition will result in the loss of agricultural land.

Response: Of the 6,100 acres of the Grouse Mtn. property, approximately 100 acres along Beech Creek has historically been irrigated farmland, primarily for hay production. Today, about 40 acres remains in hay production. The remaining acres are non-irrigated rangeland and forest -- moderate to steep slopes of grassland, scattered juniper merging into approximately 1,000 acres of Ponderosa pine forest. Currently, the owner does not graze cattle on his property on a regular basis.

Upon acquisition of Grouse Mtn., OPRD would continue the hay production along Beech Creek bottomlands, working with the local ranching community to assist with managing production and harvest. To maintain the trajectory of the current landowner's management practices, OPRD will likely not re-introduce cattle into the higher-elevation range area where efforts to restore the native plant communities have been implemented. Use of grazing for habitat management and weed control is currently utilized by OPRD and may be appropriate once a more thorough site assessment is completed and a resource management plan developed.

Forest Management: More forest land will no longer contribute to the local economy.

Response: OPRD actively manages its forest lands throughout the state by selectively harvesting trees to enhance forest health, create diverse plant communities, and reduce fuels. With experienced staff foresters, OPRD would continue the current landowner's efforts to remove western juniper from the predominantly Ponderosa pine forest. It is

anticipated that forest management would include commercial harvests depending on the project scale and market conditions.

Wildfire: Wildlife control and fuels management is a concern.

Response: As on all state park property where fire risk is high, OPRD staff foresters proactively engage in fuels management projects to reduce wildfire risks. All eligible OPRD lands are enrolled in Oregon Department of Forestry (ODF) fire protection program. Fire protection outside of ODF is provided by contracts with rural and range fire districts.

Weeds: Is OPRD prepared to control weeds on the property?

Response: The current owner has been very aggressive and has successfully improved weed control on the property. OPRD will continue this effort, knowing that any pause in weed control will result in loss of past gains. OPRD has made considerable progress in controlling weeds at Bates and Clyde Holliday State Parks and will continue these efforts in county.

Hunting: Will hunting be allowed on the property?

Response: Providing hunting in state parks is not central to OPRD's mission and is normally not compatible where there are potential conflicts with other recreational users. Hunting is allowed in specific state parks, such as along the Willamette River Greenway and Cottonwood Canyon State Park. Hunting is one of many wildlife management tools that OPRD may use as part of its participation in the larger wildlife management strategy administered by OR Department of Fish & Wildlife. For example, hunting may be used as a form of hazing to decrease browse damage on adjacent private lands.

No Park Plan: How will OPRD utilize the property?

Response: Typically after OPRD acquires land, there is an interim period during which current land practices are continued, including agricultural leases. After some period of time (3 to 10 years) there would be an interim management plan developed or it may be more appropriate to engage in a comprehensive planning process. The comprehensive plan identifies important natural, cultural and scenic resources of the land, identifies uses and recreational opportunities compatible for that area, and outlines proposed park developments. This comprehensive plan would be developed working closely with local communities and counties to address needs and concerns of local residents.

Currently, concepts have been developed to envision the potential recreational opportunities at Grouse Mtn. and how the property would be incorporated into the state park system. At a high level, these concepts include the following park uses:

- Camping (RV, biker, group, walk-in group camping) and cabins in the Beech Creek bottomlands
- Hiking and non-motorized trail riding on trail loops from lower valleys to atop Grouse Mtn., including possible access to adjacent U.S. Forest Service land
- Visitor and environmental education center, cabins and equestrian facilities at base of Grouse Mtn.
- Use of existing buildings along Hwy. 395 for park office and housing.

An illustration of potential uses can be found at <http://www.oregon.gov/oprd/pages/commission-bandon.aspx>

Local community benefits: How will a new state park benefit the local communities?

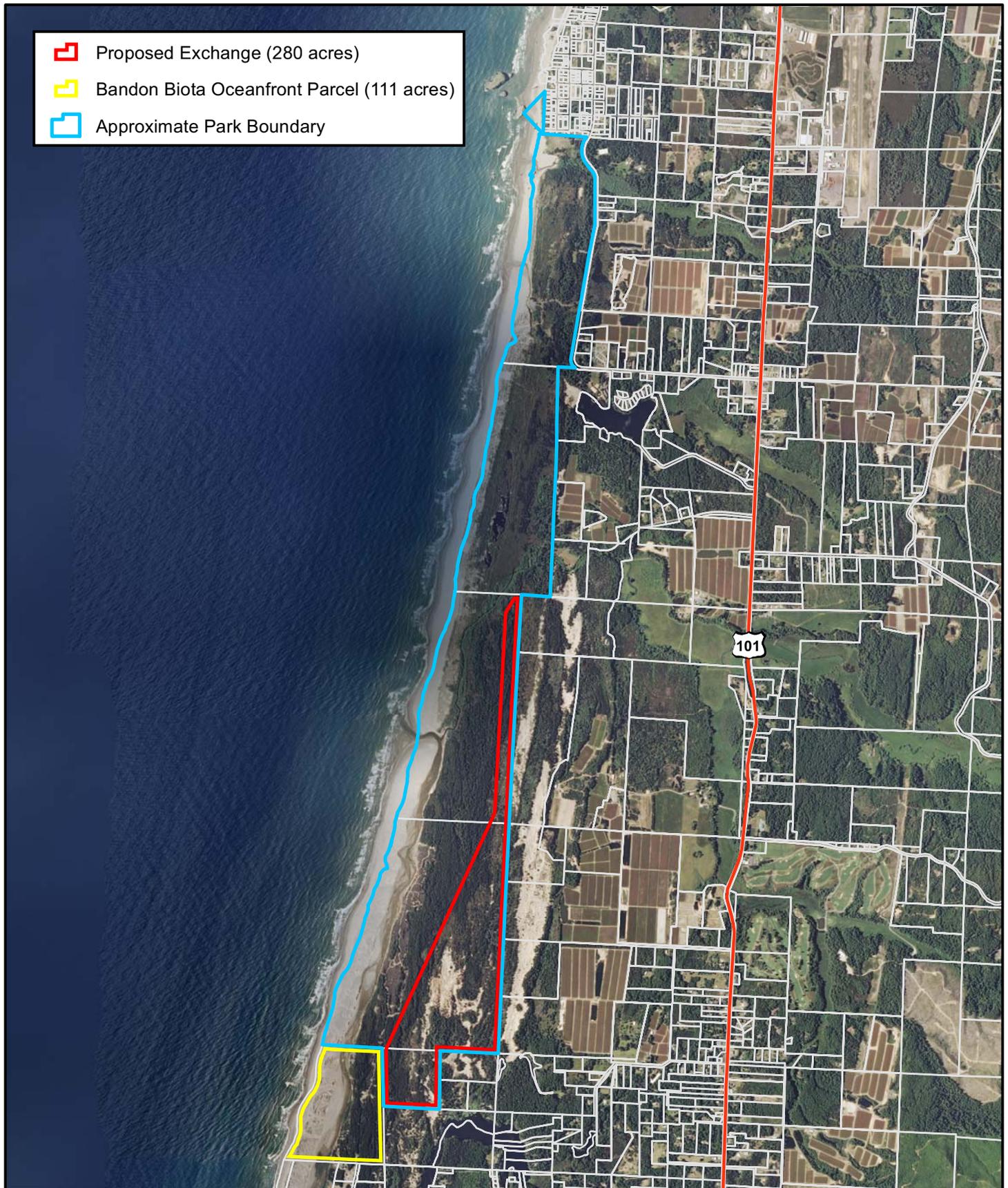
Response: Beyond the contribution of a new state park as an attractant to visitors from outside the area, a new state park at this site can offer opportunities for environmental education for local students and residents and partnerships with local community services, and other opportunities such as OYCC program. Many of these opportunities would come early during the interim management phase as well as well into the future as the park develops.

Recommended action toward resolving issues

1. Establish an inter-agency working group among governmental agencies for the purpose of identifying surplus public lands within Grant County that can be placed on the market for acquisition.
2. Develop a plan with Grant County to identify the method and level of compensation for tax revenue that may be lost if Grouse Mtn. is acquired by OPRD.
3. Develop agreements with service districts, where applicable, that provide services related to Grouse Mtn.
4. Form partnerships with the local school district and educational organizations to develop an environmental education program that could be supported by resources at Grouse Mtn.
5. In the interim period before a comprehensive plan is developed for Grouse Mtn., continue to offer the hay fields along the Beech Creek bottomlands for agricultural use.
6. Within 10 years after acquisition, develop a park comprehensive plan working closely with local communities and the county to address needs and concerns of local residents.
7. Utilize and protect surface water rights that are deeded to the Grouse Mtn. property. Identify water rights in excess of OPRD needs that may be considered for lease or sale to the private market.
8. Continue the trajectory toward weed control initiated by the current landowner at Grouse Mtn. using local weed control expertise.
9. Coordinate with ODFW toward responsible wildlife management, including the use of hunting as a form of hazing to minimize impact on neighbors.

Bandon SNA Proposed Exchange Area

Oregon Parks & Recreation Dept.
725 Summer St. NE, Suite C
Salem OR, 97301



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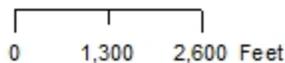
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Bullards Beach State Park

Oregon Parks & Recreation Dept.
725 Summer St. NE, Suite C
Salem OR, 97301



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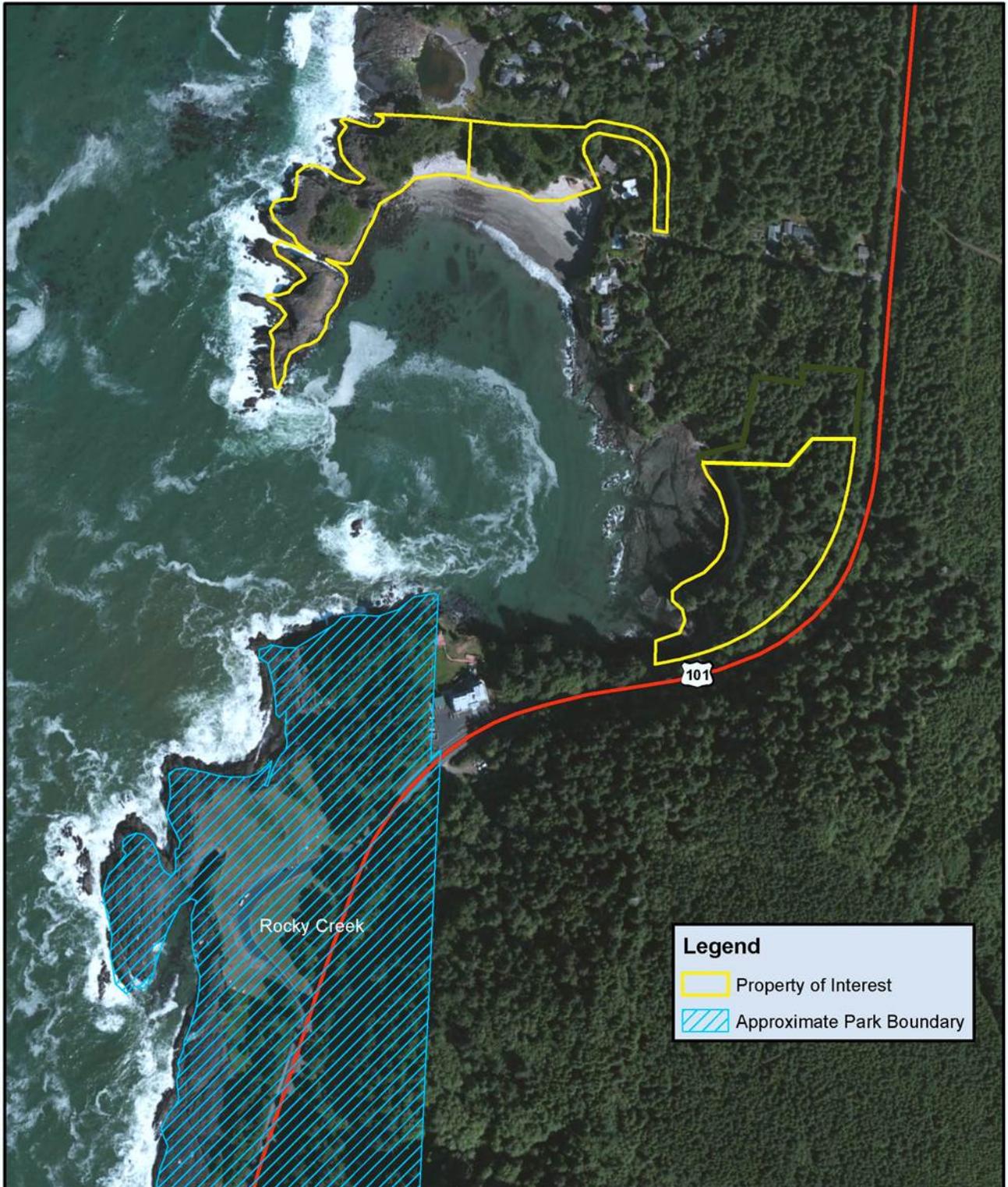
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Whale Cove

Oregon Parks & Recreation Dept.
725 Summer St. NE, Suite C
Salem OR, 97301



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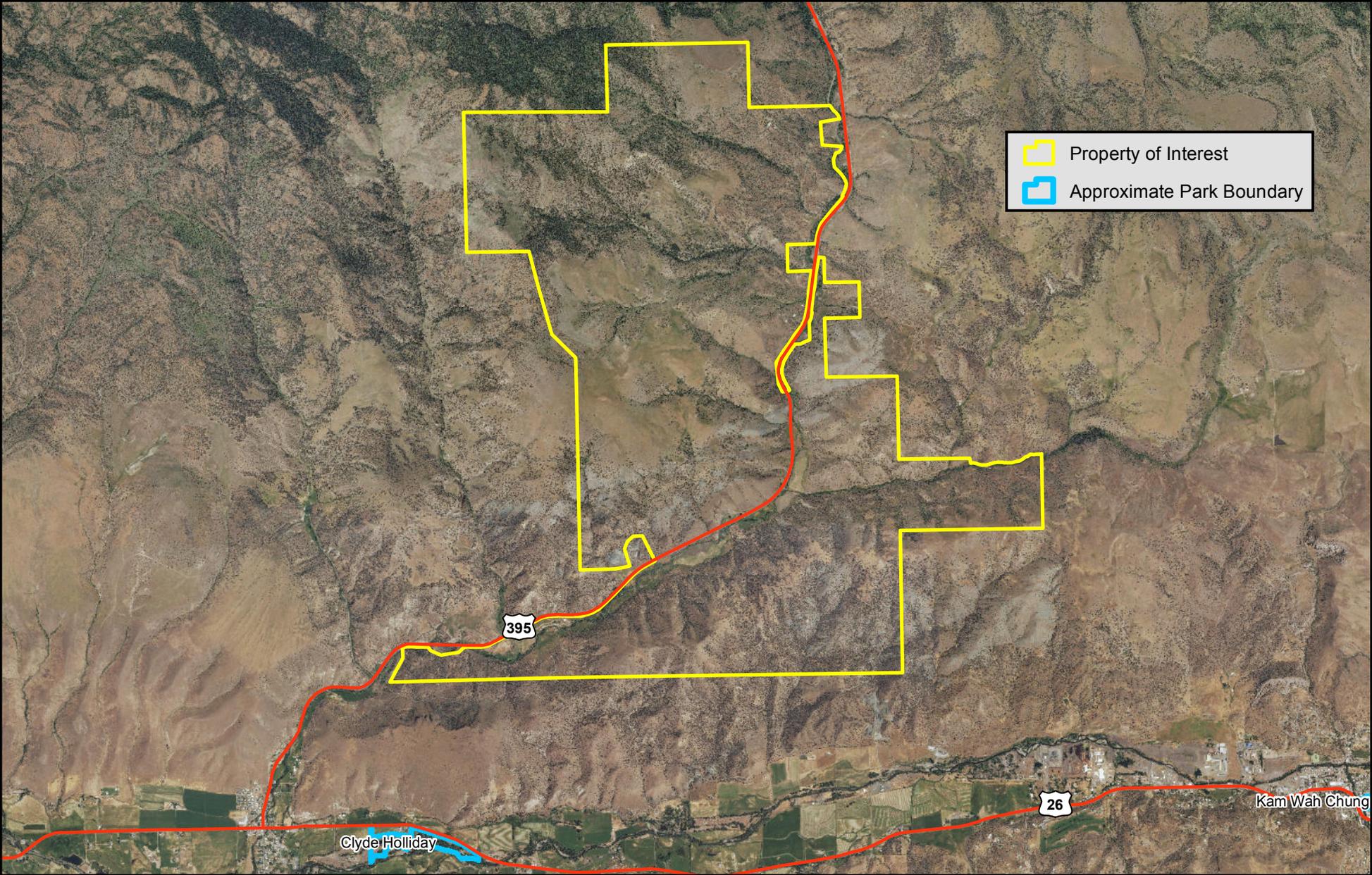
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Grouse Mountain

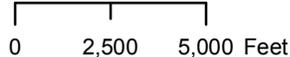
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Nature
HISTORY
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