

From: Jolly Hibbits <egretflats@wildblue.net>
To: <oprđ.publiccomment@state.or.us>
Date: 11/24/2013 9:05 PM
Subject: comment on land exchange

Dear Editor:

What can you members State Parks and Recreation be thinking??? Yet another golf course for Bandon? Michael Keizer already has 5 or 6 (lost count) near Bandon. Also near Bandon is the Face Rock course and another just south called Bandon Crossings. Doesn't Parks and Recreation know that there are other forms of outdoor recreation? Only a very small part of the population play golf, (less than 10%) or even want to. Its an expensive sport, takes up a lot of space, uses a lot of water and pesticides. Michael Keizer says "I see it as a \$15 million gift to Coos and Curry county golfers and juniors who don't even know they miss golf". He also sees a new course as being a "philanthropic" offering to the community (Capital Press, Nov. 15, 2013). My friend says it would be much more philanthropic to simply write a check for \$15 million to be used for the swimming pool that Bandon has always wanted and could not afford, and perhaps some covered year round tennis courts. That would be a real gift, and not one that simply puts more money in Keizer's already deep pockets.

Please also remember that the trade that is about to be allowed, is supposed to " provide overwhelming public benefit". Included is taking a 6100 acre ranch in Grant County essentially out of production and off tax rolls. What benefit is there taking a ranch out of production there; and providing more golf here? Good for folks who don't even know they want it, and producing a cadre of young caddies to serve the needs of those who can afford to play the expensive sport???

Also consider that two new golf courses are being considered for Cape Arago on "poor quality farm land". and two near Pistol River. Even poor quality farm land does produce food, golf courses do not. More golf courses, more food from Mexico and China! Jeff Haga says "it is creating some jobs, but there's got to be other things that create jobs other than a bunch of golf courses" (Capital Press, Nov. 15, 2013). Diversity is the answer, NOT more golf.

Please think about it Parks and Recreation members---and do something that REALLY, overwhelmingly provides public benefit to EVERYONE, not just Michael Keizer and a chosen few.

Jolly Hibbits
54070 Bear Creek Rd.
Bandon, OR 97411
541 347 2229

OPRD Publiccomment - Grouse Mountain State Park

From: "Marty Pont" <mjpont@charter.net>
To: <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 5:17 PM
Subject: Grouse Mountain State Park

I support the Grouse Mountain State Park, encouraging the use of the park for hunting as a wildlife management tool in the park, takiing into consideration safety zones around picnicareas and campsites.. Than You

OPRD Publiccomment - Grouse Mountain State Park

From: Mark Weitz <markweitz@msn.com>
To: <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 3:57 PM
Subject: Grouse Mountain State Park

Dear Sirs,

I am writing in support of the Grouse Mountain State Park that is being proposed. As an avid hunter and outdoor enthusiast I understand the importance of hunting and other outdoor activities for our citizens and especially our young people. By providing more opportunity for hunting and fishing perhaps some of these young people will have a lifelong passion, like me and become productive happy adults.

Sincerely,

Mark Weitz
V.P. Solstice Outdoor (Retired)

From: "Albert J. Farmer" <farmer4342@gmail.com>
To: <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 3:24 PM
Subject: Bandon/Biota Grouse Mountain Land Exchange

I whole heartedly agree with the preliminary approval by the Oregon State Parks & Recreation Commission with respect to the two property projects. The Grouse Mountain Ranch will provide many Oregonians with valuable recreational opportunities. I am encouraged that the commission recognizes the significant population segment that value highly the ability to hunt in Oregon and, in so doing, provide financial benefits to the local economy as well as a proven wildlife management tool on the public land. I trust that the Commission will designate portions of the exchange that allow multiple use of the ranch. I, along with many others, thank the Commission for their preliminary decision and for their trust in the Oregon citizens.

A.J.(Jed) Farmer
541-562-6267
farmer4342@gmail.com

OPRD Publiccomment - LAND TRDE

From: <safbec2@comcast.net>
To: <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 10:21 AM
Subject: LAND TRDE

As a hunter and a member of OHA for the past 17 years, I very much favor the afore mentioned land swap.

Ken Fannesbeck

OPRD Publiccomment - Grouse Mountain

From: Harold Laird <bearlaird@gmail.com>
To: <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 9:30 AM
Subject: Grouse Mountain

Oregon State Parks and Recreation Commission

Thank you for your recent preliminary approval of the Grouse Mountain land exchange. In recent years it has become harder and harder to find areas for recreational use. The people of this State are grounded in the recreational use of the States lands, but logging, though important to the economic well being of this State, has tied up much of the recreational uses and made it harder to enjoy the basic outdoors life. Thousands of licensed Oregon hunters and fishermen will be able to enjoy their past time with the passage of this exchange.

Harold L Laird

OPRD Publiccomment - Grouse Mountain State Park

From: SteveSandra Freilinger <steve.sandee@gmail.com>
To: <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 9:15 AM
Subject: Grouse Mountain State Park

I would like to express my appreciation to the commission for understanding and acknowledging that hunting is a valued and significant outdoor recreation activity for many Oregonians.

I am including my voice in expressing my support of the Grouse Mountain State Park. Hunting can be an excellent method for wildlife management in the park when safety zones are in place.

Thank you,
Steve Freilinger

OPRD Publiccomment

From: <csdaj@q.com>
To: OPRD publiccomment <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 8:46 AM

I am writing to Thank the commission for recognizing hunting as a historical, cultural and legitimate recreational past time for thousands of licensed hunters in Oregon.

I support the Grouse Mountain State Park encouraging the use of hunting as a wildlife management tool in the park, taking into consideration safety zones around picnic areas and campsites.

- I support the exchanges of property and money with Bandon Biota, a private land holding entity owned by Michael Keiser, owner of Bandon Dunes and other golf courses. Bandon Biota proposed to receive 280 acres of the 878-acre Bandon State Natural Area to help create a new walk-in golf course. According to state rules, when an outside party initiates a land exchange, the proposal as a whole must provide overwhelming benefit to Oregon's state park system. In return for receiving 280 acres of the Bandon property, the state park system would receive 208 acres of private property in the Bandon area, \$300,000 worth of help controlling gorse — an invasive plant affecting parts of Bandon State Natural Area and other south coast parks — and \$2.95 million to fund two other state park purchases. Of that amount, \$450,000 would be used to match a federal grant for a governmental entity to acquire 10 oceanfront acres at Whales' Cove in Lincoln County, and \$2.5 million would be used to fund a portion of the Grouse Mountain Ranch acquisition.

I think that it is good to look at future multiple use of our state lands.

From: Ron Makinson <ronmakinson@yahoo.com>
To: "OPRD.publiccomment@state.or.us" <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 8:18 AM
Subject: Grouse Mtn.

Dear Sirs

I am a hunter, and am glad you recognize me as a member of the largest outdoor users in the State. I support the Grouse Mountain State Park Plan, using hunting as a management tool.

Ron Makinson (Registered Voter) Gold Hill, Oregon

Sent from my iPhone

OPRD Publiccomment - Bandon/Biota Grouse Mountain Exchange

From: Randy Becker <randy@rrbecker.com>
To: "OPRD.publiccomment@state.or.us" <OPRD.publiccomment@state.or.us>
Date: 11/23/2013 7:48 AM
Subject: Bandon/Biota Grouse Mountain Exchange

Hello,

My name is Randy Becker and I live in Medford. I have lived in Oregon for 44 years, raised children who have their own families and all decided to live and work in Oregon. All our families have enjoyed using the Oregon Park system for various outdoor activities, including hunting. I appreciate the various departments in the State of Oregon, including the Parks Department, who recognize hunting as a legitimate activity for many Oregonians. In my opinion, hunting is one of the wildlife management tools available to the State. I support the Grouse Mountain State Park using hunting as a management tool while, of course, maintaining safety zones for camping and picnicking areas.

Thank you for the opportunity to provide input into this matter.

Sincerely,

Randy Becker

OPRD Publiccomment

From: "Larry" <larrymm@nehalem.tel.net>
To: <OPRD.publiccomment@state.or.us>
Date: 11/22/2013 10:58 PM

I support the Grouse Mountain State Park encouraging the use of hunting as a wildlife management tool in the park, taking into consideration safety zones around picnic areas and campsites.

Thank for taking the time.

Larry McClure

From: Vanessa Demoe
To: oprd.publiccomment@state.or.us
Date: 11/22/2013 9:15 AM
Subject: Fwd: Grouse Mtn Ranch State Park

>>> "Elberta" <rockpileoldies@ortelco.net> 11/20/2013 4:53 PM >>>

Attn. Jay Graves; ORPD Commission Co-chair

We support the Sale of Grouse Mtn. Ranch in Grant County. Our property is the Seven +/- Parcel East of the BLM Land.

We have been informed that all Property lines will be Surveyed. The Previous owner to the South of us installed An illegal access. We were told this by the Department of Transportation when we received our Permit. He built a fence to match that access which reduced our property from nine acres to what it is now. The Platt map shows ours to be 426' by 960'. Where our house sits we have only 296' north line to south . The folks we bought it from had legal proceedings in process with Him. They were elderly and lived in Bend. It was difficult for them to continue traveling over here and we did not have money keep the process going. My Husband expressed this at the public meeting in Mt Vernon. We hope this mail re-affirms his comments at that meeting.

Erie and Elberta Miller
22954 Hwy 395 N. Mt Vernon Or.
97865

New Millennium: Natural Resources Consulting & Management

Michael Scalici

54617 Geiger Ck Rd. Bandon, OR 97411
Bus. 541-290-1520 migs97411@frontier.com FAX: 541-347-8374

TO: Oregon Parks Commission

RE: Land Exchange with Bandon Biota

November 19, 2013

I am a Coos County resident who is a natural resources consultant. Over the last 25 years, I have been designing, implementing and monitoring projects that restore degraded wetlands, streams, and other sensitive habitats.

I am also somewhat familiar with the Bandon SNA, having tramped those dunes in all seasons over the last 18 years.

Last week, I downloaded and reviewed the *Vegetation Inventory and Botanical Resource Assessment for the Portion of Bandon State Natural Area under Potential Land Exchange Consideration* by Noel Bacheller, October 23, 2013.

If approved, this land exchange would transfer some 280 acres of hard-to-get to, off-the-beaten track coastal dunes with some sensitive habitats from the State of Oregon to a private golf course developer. On paper, this would sound quite unpalatable to me. But Mike Keiser and the Bandon Biota team are not your typical golf course developers. Mr. Keiser is not only fully aware of the responsible stewardship that comes with responsibly managing properties having wetlands and sensitive habitats with endangered species, but he has an excellent track record demonstrating this.

Just look at the Bandon Dunes Golf Resort as a case in point. In 2006, their superintendent won the national Environmental Leaders in Golf Award from Golf Digest and the Golf Course Superintendents Association of America for his efforts to reduce the use of water and herbicides.

In 2009, KemperSports, the company that manages Bandon Dunes, developed an environmental initiative program called *Green to a Tee*. This program encompasses environmentally focused initiatives within several core areas of facility operations, including:

- Golf course maintenance
- Habitat management
- Water conservation
- Energy use
- Recycling
- "Green" vendor utilization
- Staff education

At Bandon Dunes, the last I looked, they were close to receiving Level 3 (out of 4) certification.

In 2012, Golf Digest honored Bandon Dunes with their 4th annual Green Star Award for Outstanding Environmental Practices.

A recent Carbon Footprint Study by Syngenta concluded Bandon Dunes' overall impact is a net reduction in carbon. Using a trademarked tool called the *Turf Carbon Calculator*, they calculated the sustainability of many U.S. golf course operations. The idea behind this is to drive environmental stewardship and reduce carbon footprints on golf courses, and Bandon Dunes ranked high.

Bandon Dunes has also been certified in the Audubon Cooperative Sanctuary program. This program is an education and certification program that recognizes and helps golf courses protect the environment by enhancing the valuable natural areas and wildlife habitats that golf courses provide, by improving watering and fertilizing efficiency, and by minimizing potentially harmful impacts of golf course operations.

And, now with the creation of the Wild Rivers Coast Alliance (the non-profit organization that Mr. Keiser started to fund projects on the South Coast of Oregon committed to conservation, the community, and the economy), an entirely new funding source is available for projects that blend innovative ecological initiatives with economic opportunity while promoting sustainable land stewardship.

If you ever make it to Bandon Dunes, walk the public trails that wind through the property. There are miles of trimmed and mulched forest and dune trails for anyone to walk. Around the Bandon Preserve golf course, you'll see *Phacelia argentea*. Listed as threatened under Oregon's Endangered Species Act, here, the Silvery Phacelia is flourishing. The grounds crew has been removing the invasive European beach grass, Scotch broom and other non-native plants to restore conditions suitable for the *Phacelia* seeds to take hold. If you visit in the spring, you'll see the resident bee populations feverishly pollinating the flowering *Phacelia* plants.

I would like to express my support of the land trade between State Parks and Bandon Biota. There is indeed an overwhelming benefit to the state of Oregon should this exchange go through. Unlike what many in the opposition believe, the non-golfing public will benefit from the exchange as a result of privately-funded invasive weed management and maintained wild-land hiking trails. Environmentally responsible land stewards like Mike Keiser and Bandon Biota are hard to come by.

Sincerely,

A handwritten signature in cursive script that reads "Michael Scalici".

Michael Scalici

From: Rebecca Miller <millerre_@hotmail.com>
To: "Park.Info@state.or.us" <park.info@state.or.us>
Date: 11/22/2013 8:24 PM
Subject: Bandon Dunes and E.Oregon land swap

Hi there~

I would like to make a public comment about the land swap between Bandon Dunes and a future Eastern Oregon State Park. I'm not sure where to send my comments to, but was hoping you could forward along. I found out about the landswap through the OPB earthfix webpage.

While it would be fantastic to have another giant E.O. state park in the Ore St. Park system I'm a little dubious about about selling 230 acres of public property to a ritzy golf course (for only 2.5 million dollars) on the coast. Especially since there is limited property of this size along the coastline.

If it absolutely has to be a golf course, I'm more apt to support something like a lease program -Stonecreek in Clackamas County is a great example, where the county/state still owns the property and leases to Bandon Dunes (or whoever), gets a portion of the revenue, keeps the grounds open to the public and affordable golf for all to enjoy (not just the ritzy out of towners). Who knows -maybe the revenue from a new 'golfing' state park could help buy the Eastern Oregon state park. Win! Win!

Thank you for your time
Rebecca Miller

Oregon City

Shaun W Robertson

PO Box 242
John Day, OR 97845
(541) 620-0211

swrobertson@centurytel.net



3 December 2013

Oregon Parks and Recreation Department
Tim Wood, Director
Chris Havel, Communications and Research Division

VIA ELECTRONIC MAIL ONLY TO tim.wood@state.or.us, chris.havel@state.or.us

RE: PUBLIC COMMENT ON MOTIONS AND TASKS FROM THE PARKS COMMISSION MEETING NOVEMBER 20, 2013; AGENDA ITEM 6(A)

Dear Mr. Wood:

I write to you in response to your request for comments on the Parks Commission's motions and tasks from its November meeting related to Oregon Parks and Recreation Department's (OPRD) proposed acquisition of the property commonly known as Grouse Mountain (Property) in Grant County, Oregon. My comments are as follows:

- I reiterate my comments and incorporate by reference herein my letter of November 15, 2013 to Commission Chair Graves in opposition to the proposed acquisition with attached memorandum of November 5, 2013 to Grant County Farm Bureau, particularly with regards to the Acquisition's failure to meet any of the acquisition standards of OAR 736-019-0060. ***I request that the proposed final order describe in detail which of the acquisitions standards OPRD believes the Acquisition meets and the documentation and analysis that purportedly supports their conclusion.***
- Excepting the Vegetation and Habitat Assessment prepared by Noel Bacheller, most of the claims and conclusions of the OPRD in support of the Acquisition lack substantiation or evidence of analysis that led to the particular conclusion. For example, the document entitled only "Land Acquisition in Grant County – Proposed Oregon Parks and Recreation Department" (September 10, 2013) claims that the Property provides "ample representation" and will help our area "reach a critical mass of regional attractions" without any evidence or supporting analysis that it actually does or will do so. For a multitude of reasons, such as the preciousness of public resource funding and the level of controversy associated with this Acquisition, OPRD's evaluations and assessments should be more meaningful. ***I request that OPRD's findings in its proposed final order include definable and measurable conclusions supported by specific and detailed analysis and further, that if the findings are only supported by opinion or conjecture, they be properly referenced as such.***
- Government at all levels has a long and well evidenced record of ambiguous and unfulfilled promises with our local community. Repeatedly, in exchange for public resources, others have made promises of jobs, economic development, or other benefits that have never materialized. Rarely do these pledges include mechanisms to ensure that the promises made will either be satisfied or our community will be returned whatever was initially demanded (e.g., land for new

buildings, increased taxes, locally funded and operated programs, etc.). A negotiated solution to the proposed Acquisition should not take the historical form of the State getting what it wants without commensurate concessions secured by the local community.

- OPRD and the Property owner are negotiating and executing enforceable agreements to deliver specified resources in exchange for certain promises, much like what OPRD is asking of Grant County. If contractual agreements are good enough for the other parties to this matter, they should also be adequate to support the promises the State makes to the citizens of Grant County. Anything less than such an arrangement creates separate classes of citizens within Grant County, treated separately depending upon income and resource classification, which is an unacceptable policy posited by the State through its decisions. ***To ensure this matter is fair and equitable among all parties, as well as to demonstrate the integrity of the State, I request that the agreement proposed with Grant County include measurable and enforceable terms in parity with the real estate contract negotiated between the State and Property owner. The proposed final order should memorialize this commitment, without qualification.***
- The Commission's motion #3 and staff task #4 are inconsistent with the Governor's letter of November 19, 2013 to the Commission.
 - The Governor used the words and phrases "specific commitment ensuring" and "formalize immediate and up-front commitments" when making his request to incorporate certain matters into the Commission's decision.
 - These words have very specific meanings within both common and statutory definitions, including restriction of future action and making certain that something will happen.
 - In contrast and in obvious conflict with the Governor's direction, the staff task regarding deliberations with Grant County is characterized merely as an agreement that is delivered only "if possible". ***I request that the task be modified to remove the qualifier "if possible" and guarantee that if the issues captured within the Governor's letter cannot be agreed upon with Grant County, then the Acquisition may not occur.***
 - Furthermore, the Governor's letter requests that OPRD be directed to work closely with "county officials and local interests". The staff task is ambiguous and potentially conflicting in its direction for the staff to work with "Grant County", which may presume only the Grant County Court.
 - None of the Grant County commissioners own production property in Grant County or are directly involved in agriculture or any other natural resource

production industry and therefore cannot necessarily represent these concerns as effectively as the groups directly representing local producers.

- The negotiation process and the eventual agreement can only have credibility if the process is viewed as balanced, which cannot occur if the OPRD fails to include opponents within its negotiations.
- ***I request that the task be clarified to ensure that OPRD is directed to work with all interested parties to resolve concerns from Grant County and that the formal agreement required to be signed prior to acquisition should be with the governing body of Grant County, the opponent groups, and any appellants to the Commission's decision.***
- The official position of the governing body of Grant County was expressed to the OPRD in a letter of unanimous opposition from the Grant County Court on July 12, 2013. This position was affirmed by the County Court in its meeting of 13 October 2013 (see minutes on file with Court staff or here: http://www.bluemountaineagle.com/news/county_minutes/).
 - The Court has not altered its official position regarding the Acquisition.
 - Because the testimony of commissioners Myers and Labhart in front of the Parks Commission during its November 20, 2013 hearing were in conflict with the official position of Grant County, their comments can only be considered those of individual citizens and not official representatives of Grant County.
 - ***I request that the testimony of both Commissioners Myers and Labhart be removed from the record of the proceeding or considered only as their own personal opinions and not that of the governing body of Grant County.***

Grant County has a long history of positive collaboration with the OPRD on various parks that the local community has identified as important natural, cultural, and economic resources. Unfortunately, OPRD's approach to the proposed Acquisition has substantially damaged this relationship. OPRD's proposed final order and actions from there forward will determine whether that damage is irreversible.

Sincerely,



Shaun W Robertson
John Day, OR

From: Andrew Janssen <janssenandrew@gmail.com>
To: <chris.havel@state.or.us>
Date: 12/5/2013 12:19 PM
Subject: Bandon State Natural Area proposal comment

I have been a resident of Grant County for the past eight years. My wife and I have three small kids and thoroughly enjoy the outdoors opportunities.

I am writing in support of the Bandon State Natural Area proposal, specifically the proposal to acquire 6,300 acres in Grant County for a future state park. While I recognize not everyone supports this effort, I believe it would be an asset to both Grant County and the state of Oregon.

Thank you. Andrew Janssen, MD

From: Lee Insko <leeinsko@eoni.com>
To: <opr.d.publiccomment@state.or.us>
Date: 12/3/2013 7:19 PM
Subject: Land trade

I am adamantly opposed to the recent proposed trade of land by the Oregon Parks and Recreation Department the affects any natural resource land being taken out of production because such a trade would result in private ownership of what was public land that had natural resource value .

Lee Insko

From: James Lowrie <jclowrie47@gmail.com>
To: <OPRD.publiccomment@state.or.us>
Date: 12/5/2013 2:01 PM
Subject: Proposed Grouse Mountain Ranch land purchase

I am contacting you to express my support for this proposed addition to state lands. Public access in many areas of Oregon is often limited by private lands or other access restrictions. I am a member of the Oregon Hunters Association and support allowing hunting on these lands if purchased for public use. I have heard that Grant County and some ranchers oppose this purchase. Trying to restrict private transactions by any government body just isn't right. The current owner has invested significant resources in his land holdings that have in fact already increased tax revenues to the county. As a tax payer I would support some compensation in lieu of taxes to the county by the agreement. But the increase in use of the lands by hunters and other recreation uses would certainly add income to county businesses as well. I am a former resident of Grant County and know the area well. Thank you for considering my input.

James C. Lowrie
2255 N.W. Jackpine Ct.
Redmond, OR 97756

OPRD Publiccomment - 2013 Bandon Biota Land Exchange

From: Chris Labbe <cwlabbe@kerrpacific.com>
To: "opr.d.publiccomment@state.or.us" <opr.d.publiccomment@state.or.us>
Date: 12/2/2013 3:20 PM
Subject: 2013 Bandon Biota Land Exchange

Dear Oregon Parks and Recreation Department,

I have recently learned of the details surrounding the 2013 Bandon Biota Land Exchange, and do not believe that following through with the exchange will be in the best interests of Oregon because it does not "...provide an overwhelming public benefit..." as stated in Oregon Parks and Recreation Department Acquisition and Exchange Policy (OAR [736-019-0070](#)). Exchanges like this harm Oregon's rural communities. Please do not accept the terms of the 2013 Bandon Biota Exchange Proposal.

Sincerely,

Chris Labbe

Chris W. Labbe
President
Kerr Pacific Corp.
1211 SW 6th Ave.
Portland, OR 97204
O: 503-221-1301
Cell: 503-351-7429
Sent from my iPad

OPRD Publiccomment - 2013 Bandon Biota Land Exchange

From: Tess White <twhite@Alltech.com>
To: "opr.d.publiccomment@state.or.us" <opr.d.publiccomment@state.or.us>
Date: 12/2/2013 4:22 PM
Subject: 2013 Bandon Biota Land Exchange

Dear Oregon Parks and Recreation Department,

I have recently learned of the details surrounding the 2013 Bandon Biota Land Exchange, and do not believe that following through with the exchange will be in the best interests of Oregon because it does not "...provide an overwhelming public benefit..." as stated in Oregon Parks and Recreation Department Acquisition and Exchange Policy (OAR 736-019-0070). Exchanges like this harm Oregon's rural communities. Please do not accept the terms of the 2013 Bandon Biota Exchange Proposal.

Kind regards,

Tess White,
Territory Sales Manager

Alltech | Alltech.com
29856 Country Lane, Hermiston, OR 97838
Cell: 541.429.1522
facebook.com/AlltechNaturally | [@Alltech](https://twitter.com/Alltech)



OPRD Publiccomment - Comments re: hiring new OPRD director

From: Bruce Barnes <flora.id@wtechlink.us>
To: <opr.d.publiccomment@state.or.us>
Date: 12/2/2013 5:22 PM
Subject: Comments re: hiring new OPRD director
CC: John Hoffnagle <john.hoffnagle@oregonstateparksfoundation.org>

Over the last 17 years, the Oregon State Parks Foundation has enjoyed a close working relationship with the Oregon Parks and Recreation Department. As chair of the Foundation, I assure the Department and the State Parks Commission we plan to continue to work closely with whoever may be hired as the next Department director. We look forward to working together in support of Oregon's wonderful state park system.

--

Bruce Barnes
Chair, Oregon State Parks Foundation
541-276-5547
Cell 541-377-2634
flora.id@wtechlink.us

OPRD Publiccomment - 2013 Bandon Biota Land Exchange

From: -J- Ranch <barjbarranch@gmail.com>
To: <opr.d.publiccomment@state.or.us>
Date: 12/2/2013 10:16 PM
Subject: 2013 Bandon Biota Land Exchange

Dear Oregon Parks and Recreation Department,

I have recently learned of the details surrounding the 2013 Bandon Biota Land Exchange, and do not believe that following through with the exchange will be in the best interests of Oregon because it does not "...provide an overwhelming public benefit..." as stated in Oregon Parks and Recreation Department Acquisition and Exchange Policy (OAR 736-019-0070). Exchanges like this harm Oregon's rural communities. Please do not accept the terms of the 2013 Bandon Biota Exchange Proposal.

Sincerely,

April Bronson

OPRD Publiccomment - 2013 Bandon Biota Exchange

From: "Thomsen, Judy" <Judy.Thomsen@oregonstate.edu>
To: "opr.d.publiccomment@state.or.us" <opr.d.publiccomment@state.or.us>
Date: 12/3/2013 8:09 AM
Subject: 2013 Bandon Biota Exchange

To Whom It May Concern:

I do not believe that following through with the 2013 Bandon Biota Exchange proposal will be in the best interests of Oregon because it does not "...provide an overwhelming public benefit..." as stated in Oregon Parks and Recreation Department Acquisition and Exchange Policy (OAR 736-019-0070). Exchanges like this harm Oregon's rural communities. Please do not accept the terms of the 2013 Bandon Biota Exchange Proposal.

*Judith Ann Thomsen
PO Box 678
Condon, OR 97823*

OPRD Publiccomment - 2013 Bandon Biota Exchange Proposal

From: Pam Wunderlich <mprairie@centurytel.net>
To: <opr.d.publiccomment@state.or.us>
Date: 12/3/2013 9:32 AM
Subject: 2013 Bandon Biota Exchange Proposal

Dear Oregon Parks and Recreation Department,

I have recently learned of the details surrounding the 2013 Bandon Biota Land Exchange, and do not believe that following through with the exchange will be in the best interests of Oregon because it does not "...provide an overwhelming public benefit..." as stated in Oregon Parks and Recreation Department Acquisition and Exchange Policy (OAR 736-019-0070). Exchanges like this harm Oregon's rural communities. Please do not accept the terms of the 2013 Bandon Biota Exchange Proposal.

Sincerely,

Pam and Mark Wunderlich, Wilkinson Ranches LLC

OPRD Publiccomment - Oregon's Land

From: Tammie and Clay McEnroe <mcenroe@wildblue.net>
To: <opr.d.publiccomment@state.or.us>
Date: 12/3/2013 12:42 PM
Subject: Oregon's Land

Dear Oregon Parks and Recreation Department,

I have recently learned of the details surrounding the 2013 Bandon Biota Land Exchange, and do not believe that following through with the exchange will be in the best interests of Oregon because it does not "...provide an overwhelming public benefit..." as stated in Oregon Parks and Recreation Department Acquisition and Exchange Policy (OAR 736-019-0070). Exchanges like this harm Oregon's rural communities. Please do not accept the terms of the 2013 Bandon Biota Exchange Proposal.

Sincerely,

Tammie McEnroe

OPRD Publiccomment

From: "Grant, Shane" <Shane.Grant@corvallisoregon.gov>
To: "'oprd.publiccomment@state.or.us'" <oprd.publiccomment@state.or.us>
Date: 12/3/2013 2:13 PM

Dear Oregon Parks and Recreation Department,

I have recently learned of the details surrounding the 2013 Bandon Biota Land Exchange, and do not believe that following through with the exchange will be in the best interests of Oregon because it does not "...provide an overwhelming public benefit..." as stated in Oregon Parks and Recreation Department Acquisition and Exchange Policy (OAR 736-019-0070). Exchanges like this harm Oregon's rural communities. Please do not accept the terms of the 2013 Bandon Biota Exchange Proposal.

Sincerely,

Shane Grant

OPRD Publiccomment - Bandon Biota Land Exchange with Oregon Parks and Recreation Department

From: Craig Herman <cjherman@gmail.com>
To: "OPRD.publiccomment@state.or.us" <OPRD.publiccomment@state.or.us>
Date: 12/4/2013 11:31 AM
Subject: Bandon Biota Land Exchange with Oregon Parks and Recreation Department
CC: <sen.alanolsen@state.or.us>, "rep.billkennemer@state.or.us" <rep.billken...>

Dear Oregon Parks and Recreation Department Representatives:

I understand that the land exchange between the Oregon Parks and Recreation Department (OPRD) and Bandon Biota (aka Bandon Dunes Golf Courses) has been tentatively approved on the basis that this land exchange would provide an "overwhelming public benefit". I strongly disagree with the Commission's conclusion and submit that this land exchange would in fact result in serious public harm. Increase in publicly owned lands clearly reduces the property tax base. This is not the best use of the land and does nothing to add jobs in the state.

There are already adequate public lands available in the State for parks and recreation use. Converting Oregon's private working lands to public property in the case of the acquisition of the Grouse Mountain Ranch in Grant County clearly does not provide an "overwhelming public benefit". I have serious concerns about OPRD's management of the lands they are currently responsible for and the addition of more land would require even more tax dollars to manage. In addition, the Commission's failure to articulate how exchanging 280 acres of the Bandon State Natural Area provides a benefit to the people of the State.

I ask that the Commission reconsider their decision to approve this land exchange since it clearly does not benefit Oregonians.

Respectfully yours,

Craig J. Herman
13180 S. Carus Road
Oregon City, OR 97045

OPRD Publiccomment - Bandon Dunes Expansion

From: Mike Schaer <m.schaer@yahoo.com>
To: "OPRD.publiccomment@state.or.us" <OPRD.publiccomment@state.or.us>, Camer...
Date: 12/4/2013 3:00 PM
Subject: Bandon Dunes Expansion

Good day,

I am a land owner and cranberry farmer who is in the process of converting this farm into the first [ODF@W](#) licensed Hybrid Striped Bass live export aquaculture facility in Oregon. Johnson Creek, a salmon stream runs through our property. This creek has been earmarked by Mike Keiser along with a group of cranberry growers and the City of Bandon for the future expansion of their water shed. This dam project would be approximately 93 foot in height and would cut off fish passage to the Pacific. This group is on record threatening to use eminent domain to expedite this project if adjacent land owners whose land is affected do not comply with this proposed expansion. I am vehemently opposed to Mike Keiser's brand of capitalism as shown in Grant & Coos Counties. I do not like how this creek has been written off as a non salmon creek. We have gone to great lengths to safe guard Johnson Creek from any problems which could jeopardize the salmon runs and I feel Mr. Keiser should be held to the same level of responsibility. Mr. Keiser's plans are far reaching and by allowing him to proceed invokes a type of domino expansion I don't believe Oregonians are in favor of. Thank you very much.

Regards,

Mike Schaer
Sassamanesh
88804 Windhurst Ln.
Bandon, Or. 97411
541-347-1780

&nbs p;

m.schaer@yahoo.com

OPRD Publiccomment - 2013 Bandon Biota Land Exchange

From: CenturyLink Customer <a2oliver@centurylink.net>
To: <opr.d.publiccomment@state.or.us>
Date: 12/5/2013 6:54 AM
Subject: 2013 Bandon Biota Land Exchange

Dear Oregon Parks and Recreation Department,

I have been listening to the details surrounding the 2013 Bandon Biota Land Exchange, and do not believe that following through with the exchange will be in the best interests of Oregon. This action does not "...provide an overwhelming public benefit..." as stated in Oregon Parks and Recreation Department Acquisition and Exchange Policy (OAR 736-019-0070). Exchanges like this harm Oregon's rural communities. Please do not accept the terms of the 2013 Bandon Biota Exchange Proposal.

Sincerely,

Alec Oliver

Home: (541) 542-2582

Cell: (541) 620-4098

a2oliver@centurylink.net

OPRD Publiccomment - Grouse Mountain Ranch

From: "Kerri A. Latshaw" <klatshaw@bluecc.edu>
To: "opr.d.publiccomment@state.or.us" <opr.d.publiccomment@state.or.us>
Date: 12/5/2013 1:49 PM
Subject: Grouse Mountain Ranch

To Whom it may Concern,

I am writing this letter to show some support for this deal. I am a Grant county resident, who unlike many of the opponents, did not inherit thousands of acres from my family. I see potential in this property to be developed into trail systems for horses and mountain bikers. I think such a park would attract visitors from outside the county as well as serve the locals. I also think such a park is worth the extra taxes. Most of the people I have spoken with about this feel the same, and resent the anti-government cattlemen's tactics to derail this deal. I would be happy to have a petition signed if this comes to that point. I was pleased to see in the paper here this week that the deal is backed by some county officials as well. Grant county needs to evolve; this is beautiful country that could host more tourism if we had more attractions and facilities. Thank you for not simply bending to the will of the opponents. Sincerely,

Jim and Kerri Latshaw

From: Rich Shepard <rshepard@twodogs.us>
To: <OPRD.publiccomment@state.or.us>
Date: 12/2/2013 7:29 AM
Subject: Support for Bandon/Biota-Grouse Mountain Land Exchange

I am a member of the Oregon Hunters Association as well as a long time hiker, landscape photographer, and supporter of multi-use public lands.

At your last meeting you recognized hunting as a legitimate recreational activity that historically and culturally (in most parts of the state in any case) of thousands of licensed hunters. Of equal importance in the current economic climate, hunters financially contribute to many rural communities by their presence and purchases of food, fuel, and lodging. The excise tax on hunting equipment and consumables supports the state's Department of Fish and Wildlife so the more opportunities there are for hunters on state lands the more the economic contributions we make.

I support the land swap to create the Grouse Mountain State Park and encourage use of hunting on this property as a wildlife management tool. Responsible hunters take into consideration safety zones around picnic areas and campsites as we do on state and national forests and structures and equipment on private lands where we are granted permission to hunt.

Dr. Richard Shepard
Troutdale
503-667-4517

December 5th, 2013

To the Oregon Parks and Recreation Commissioners,

Something stinks here.

OHA has been duped—the landowner of the Grouse Mt. property never before allowed hunting, is against hunting and is not making this land deal to allow what he called “slaughter” of his wildlife. One of the tasks you, the Commission, gave the OPRD staff is to “2. Describe the proposed approach to hunting at Grouse Mountain.” In reality, 6,100 acres will support only a few hunters per season to harvest a deer or an elk. One hunting drive and the animals will be run out of there onto adjacent private lands which is where the probability of trespass will become an issue for OPRD. I would lay a bet that the opportunity will be very, very limited. You might even have to pay a huge fee to do that, since the purchase price is so high. They may even plan a “governors” hunt with a nice overnight in the huge mansion that OPRD is to acquire with the deal. Wonder how much that will cost? There are ***over*** a million and a half acres already drawing hunters to Grant County. This is no added benefit to the economics of Grant County.

OPRD assured the public that no land in-holdings would occur as part of the Grouse Mt. acquisition on several occasions. However, the present proposal for the acquisition is planned for two phases: phase one will happen when Bandon Biota gets his deal to go through, the Grouse Mt. raw land will transfer to the OPRD; phase two will happen when OPRD gets another \$2 million to purchase the big house and the structures. There is a clause that if the money for phase two doesn't come through, the landowner will get his house and 695 acres back. Reference follows, from OPRD Commission agenda item document, Appendix B: “***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).***” Something's fishy here. The landowner will have a nice little ESTATE surrounded by a state park which will increase his property values, transfer his cost of property caretaking and maintenance responsibilities and take away his tax issues. If the State of Oregon can't afford to pay the entire purchase price, then this proposal is ***too expensive***. The cost after purchase will be just as expensive—just read the Appendix C of that same document and finally, they may not do anything for 10 years! Why not?

Why is the Governor involved in this and putting pressure on the Commission to get this exchange passed? (listen to the testimony of Brett Brownscomb, his Natural Resources Advisor on the audio of the Nov. 20th meeting when he took in excess of 15-20 minutes to stress to the Commission that, to paraphrase, ***just because there's overwhelming opposition to the acquisition, it didn't mean that there wasn't overwhelming public benefit; overwhelming opposition wasn't as much a consideration as what the State***

was going to get.) Mr. Brownscomb asked the Grant County Court, during the teleconference with the proposed governor's letter, to keep it a secret for now. This is the second incidence our county judge has been asked to keep the deal a secret, which was the first mistake (he admitted) for our County Judge. The opposition in Grant County is coming primarily from the landowning, taxpaying agricultural community who is presently expressing a "No Confidence" protest to their County Court over their testimony at the commission meeting. The County Judge, Scott Meyers, said to the representatives of the public who attended last weeks County Court meeting (approximately 35 people-see Blue Mt. Eagle Dec. 4th issue for details) that he testified his "personal opinion" that he was now in favor of the proposal, but in listening to the audio, it is obvious, he represented to the Commission that he was speaking that the County Court was in favor. ***The Commission has been duped.*** And *what is* the governor's interest in this to intervene with offers of concessions to appease the concerns of the opposition with offers that may not come to fruition once the Commission has done what the boss wants them to do?

As one of the public comments at a Farm Bureau meeting said, "Money Talks". Obviously, the "monied" are talking loudly because no one is listening to the common sense that has come out so loudly in opposition to this entire exchange and acquisition deal. Something stinks here.

Sincerely,

Cici Brooks
34488 Short Corner Rd.
Fox, OR 97856

December 6th, 2013

OPRD Commission:

As a neighboring land owner to Grouse Mountain Ranch, I feel compelled to comment on this proposed acquisition by OPRD.

In the beginning of this proposal, even after Executive Director Woods request of Judge Myers "to keep this a secret", I didn't take a position. I didn't like the loss of private property or loss of tax revenue but it wasn't a huge concern. The taxpayers of Grant County would continue to support education of our children and other county services, and then I started attending the meetings. My position has changed.

The first meeting was Director Woods addressing the Grant Co. court. All Mr. Woods could tell us was not to worry; OPRD would make this park what ever Grant Co. wanted it to be, even though the majority of comments were in opposition. The only specific statement from Mr. Woods was, there will be no in-holdings created, OPRD will purchase the entire property. And yet here we are with the potential of a large in holding by the present owner. Now Mr. Woods has decided to retire. What would you think?

The second meeting was the public hearing in Mt. Vernon on August 19th. One of OPRD's commissioners attended that "dog and pony show." This meeting was designed to accomplish nothing. When asked if our (Grant County's) comments mattered, OPRD's response was "absolutely yes." With 60+ people in attendance, only two people raised their hands in favor of this acquisition. OPRD continued forward with this proposal. What would you think?

The third meeting on September 5th consisted of myself, Mr. Meredith, and OPRD staff Jim Morgan and Dennis Bradley. My concerns and questions were aimed at Stewardship Director Jim Morgan, unfortunately he couldn't answer one with out an "if", "maybe", "possibly," or "we'll have to see." Ironically, Mr. Meredith had an answer for every one, he must work for OPRD. What would you think?

The fourth meeting was at a Grant Co. Farm Bureau meeting on Oct 21st with OPRD's John Potter. It was just like all the past meetings; lots of questions and no answers from OPRD unless you like, "if's", "maybe's", "possibly's" and "we'll have to see's." The interesting part was when an attorney friend from Portland, who attended this meeting to visit old friends was confronted in less than 24 hours by the governor's office. What would you think?

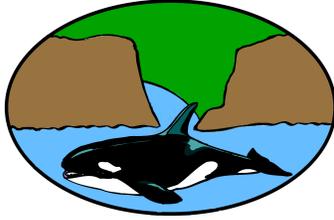
The fifth meeting was an 11th hour request by the governor's office for aide Brett Brownscomb to address the Grant County court on Nov, 13th. Mr. Brownscomb presented a draft letter from the governor to OPRD asking OPRD to work towards a resolution of Grant County's concerns, but as in the beginning, it needs to be a secret. With all the issues in the State of Oregon, the governor is worried about a Park acquisition. What should I think?

Last but not least, on November 20th, Grant County's opposition was totally misrepresented by Judge Scott Myers at the OPRD commission meeting in Corvallis. I know what I think!

If there is any doubt, I am opposed to the acquisition of Grouse Mt. Ranch by the Oregon State Parks and Recreation Department. This entire proposal is based on secrets, lies, and mis-information.

Sincerely,

Ken Brooks
34488 Short Corner Rd,
Fox, OR 97856



ORCA: Oregon Coast Alliance

P.O. Box 857, Astoria OR 97103

(503) 391-0210 <http://www.oregoncoastalliance.org>

Protecting the Oregon Coast

Dec. 6, 2013

Sent via Email

Tim Wood, Oregon Parks and Recreation Department Director
Chris Havel, Communications Director
Vanessa R. DeMoe, Parks and Recreation Commission Assistant
Oregon Parks and Recreation Commissioners
Oregon Parks and Recreation Department
725 Summer St. NE, Suite C
Salem OR 97301

Re: Oregon State Parks and Recreation Commission/Bandon Biota Land
Exchange and Acquisition

Dear Director, Communications Director, Assistant, and Commissioners,

The Oregon State Parks and Recreation Commission (“Commission”) on November 20th gave preliminary approval to the Bandon Biota land exchange. ORCA believes a preliminary approval prior to accounting for the additional information the Commission requested is premature and legally fatal to the Commission’s decision. The Commission’s preliminary approval demonstrates that the County’s preliminary, and ultimately final, decision has been predetermined from the beginning.

Even more problematic for the Commission is that the Parks Department already made a possibly irretrievable commitment to purchasing Grouse Mountain Ranch prior to any Commission action approving the purchase. Parks Department Director Tim Wood signed a purchase and sale agreement with the Merediths, owners of Grouse Mountain Ranch, with signature dated November 8, 2013, weeks before the November 20th Commission meeting. The supplemental comments requested by the Commission are, therefore, superfluous, and the public process is nothing but pretense. The Commission’s conduct clearly violates the Commission’s policy to “preserve the public’s confidence in our business practices and stewardship of real estate assets.” OAR 736-019-0040(2).

ORCA also finds this preliminary decision troubling because the Commission has acknowledged that Grant County does not support the exchange and acquisition, a standard under the OPRD rules. *See* OAR 736-019-0070(3)(b); OAR 736-019-0120(5). Instead of denying the application because the local community does not support the exchange and acquisition, the Commission is pursuing ways to make the local community in Grant County support the proposal. The Commission's refusal to deny the application as a result of the local community's opposition is clear legal error.

The Commission's preliminary approval also fails to account for the loss a significant portion of Bandon State Natural Area both geographically and ecologically. The new configuration of lands requested by Bandon Biota include even more unspoiled and ecologically valuable habitat in Bandon SNA than the original proposal. The Commission cannot make a good faith determination that the exchange and acquisition is an "overwhelming public benefit," as defined by the Commission's rules, unless it weighs these losses of the Bandon State Natural Area.

The loss of a substantial portion of a coastal park – one of the most visited in the Parks system – must account "for the natural, scenic, cultural, historic, recreational, and operational benefits of a proposal that are likely to be above and beyond the monetary value of the exchange." OAR 736-019-0020(8). Clearly, the loss of the recreational and ecological integrity of a significant park must be a major factor in the calculus. In addition, that loss of Bandon SNA is a loss to the *coastal* state park system, which, as a unit, is the most visited portion of the entire park system statewide. Approximately 65% of all day use is to coastal state parks; thus, the Commission must take into account the impact this exchange has on the most important sub-component of the state park system. In other words, the Commission must weight whether the "overwhelming public benefit" standard is met in reference to the coastal state park system as well as the entire park system statewide.

Finally, the Commission's decision to treat the purchase of the Grouse Mountain Ranch as only an acquisition, and not part of the larger exchange, is unfounded. The OPRD summary for Agenda item 6b [Proposed Exchange with Bandon Biota] for the OPRD Commission July 2013 meeting, dated July 17, 2013 says, "Bandon Biota will contribute the entire \$2,500,000 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."

Grouse Mountain Ranch is clearly and obviously a component of the land exchange, and, therefore, the Grouse Mountain acquisition must satisfy *all* criteria for exchanges initiated by others, including the "overwhelming public benefit...that is resounding, clear and obvious" standard. There have not been any materials from OPRD showing that Grouse Mountain Ranch meets the exacting standards for acquisition *and* the standards applying to exchanges initiated by others as required by OPRD Division 19 Rules.

In conclusion, it is apparent that the Commission failed to follow the prescribed procedure (including the agency's own rules), misinterpreted applicable law, exceeded its discretion, violated policies and practices, and failed to rely on substantial evidence in the record. *See* ORS 183.484(5). Thus, the Commission's preliminary decision is nothing more than a prelude to a legally deficient final decision.

Sincerely,

/s/ Cameron La Follette

Cameron La Follette
Land Use Director

December 6, 2013

Dear OPRD Commissioners,

The Grant County Stockgrowers represent the agricultural community of Grant County and have repeatedly expressed our concerns regarding the Bandon Biota Exchange which includes the Grouse Mountain Ranch Acquisition. It is interesting and enlightening that the agricultural community has been labeled the "vocal minority" and that the supposed "silent majority" that are in favor have been able to convince our County Court that the creation of a 6500 acre state park in a county that already is over 1.8 million acres of land in public ownership is in the counties best interest. (We already have droves of hunters that recreate on our public and private lands and 6500 acres ought to be able to accommodate at least a dozen more, right?) What is disheartening to our organization is the implication that the vocal minority has intimidated the silent majority to be fearful to state their opinions. We disagree with this line of conjecture; we are vocal because we are passionate about our livelihoods and our home. We have been active in our community for generations and although we don't feel this gives us any preference to an opinion, we know that it takes conviction to stand up and express your opinion. So we will field the "shots" because our reasoning for opposing the Grouse Mt. acquisition is valid. If the majority who are in favor can stand up, be counted and state their own opinions and can justify the costs, we will always, respectfully listen.

We stand by our original letter of comment dated July 14 and re-iterate the fact that so much distrust has been generated through the interactions with the OPRD staff and the Grant County Judge. The distrust began with a request to the judge to keep the potential for the park acquisition a secret, which was a request repeated by the Governor's natural resource advisor, Brett Brownscomb, at a impromptu addition to the court agenda (teleconference) where he proposed the draft of a letter from the Governor which would address the concerns of the opposition and make *proposed* concessions if the court would support the Bandon Biota Exchange proposal. Our County Judge misrepresented the position of the Grant County Court to the OPRD Commission in testimony at the Nov. 20th meeting when he expressed his "personal opinion" after stating that he represented 7500 people in 450 square miles of land. (see Blue Mt. Eagle-Dec 4th issue regarding Nov. 27th court meeting where over 35 attendees expressed "no-confidence" in his ability to represent them). Then Mr. Brownscomb took the microphone at the commission as the last directive to the commission that they may reasonably ignore the overwhelming opposition in making their determination that the Bandon Biota Exchange Proposal was/is an "overwhelming public benefit." Again, the intervention of the Governor disregarded our request to him (letter-dated Oct. 22, 2013, also posted on OPRD comments) which stated "...we are asking you to investigate why this state agency continues to pursue this action against the wishes of the county and the majority of the taxpaying citizens that feel this would be detrimental to the well being of our county." We request you *emphasize* to this state agency that the objections to this proposal should not be ignored and to respect our concerns by ceasing the pursuit of this proposal. The passage of these private lands into public ownership against these overwhelming objections will only create a hostile environment for the future Oregon State Park in Grant County." We would have to ask **why** is the governor so interested in making concessions that he may not be able to deliver to get the Grant County Court (secret) support for a proposal that has overwhelming opposition in both communities **and** have his advisor to "instruct" the Commission to ignore overwhelming opposition in making their determination for overwhelming public benefit?

We don't believe there is a chance of getting public lands back into private ownership; and all just to make the Grouse Mt. acquisition become feasible? There have been too many errors in judgment for the community to be able to blindly trust the actions of the Oregon Parks and Recreation Department. The cost issues have not been addressed for the operation and

maintenance of the proposed park. If the OPRD is not able to purchase the property outright without creating an inholding, then this property is too expensive and the Commission should not proceed in approving its acquisition.

Sincerely,

Jack Johns, President
Grant County Stockgrowers