November 9, 2016

MEMORANDUM
TO: Planning Commission
FROM: Stuart Cowie, Planning Department

RE: November 17, 2016, continuation of the Planning Commission Hearing concerning the Douglas County Local Parks Master Plan.

The purpose of this memo is to summarize the verbal/written comments made at each of the six PAC meetings and the Planning Commission hearing held October 27, 2016 concerning issues involving the draft plan. This summary is being made in order to identify those specific concerns and show within the plan where and how the concerns are being addressed. The 10.20.16 draft of the plan is the most recent draft and therefore page numbers will be referenced from this document within the memo. Some portions referenced will have new language added and will be incorporated into a new draft upon a recommendation from the Planning Commission. The issues raised are not sorted into any specific order.

1. Logging of park properties.

Identifying funding opportunities such as logging of a park property is not a standard required within a parks master plan. As a result, possible logging opportunities on park properties are not an action associated with this plan. Concerns involving logging of park properties have been expressed throughout the project. Initially logging opportunities were explored involving "Unclassified" park properties. Decisions on individual park properties management including logging are an issue that rests with the PAB, in which citizens may continue to participate.

The second to last paragraph of page 37 and the first paragraph of page 38, indicate the position which logging has in this document.

"The Parks Department does not anticipate developing any of these properties (Unclassified Park Properties) in order to make them accessible to the public. Instead, the Parks Department has explored the possibility of selling/land swaps or logging portions of the properties in an effort to help fund improvements to already developed park properties."
Although some of these ideas have been implemented in the past and may or may not occur in the future, it is important to note that land swaps, logging, or sale of any park property is not an action associated with this plan."

2. Maps of each park property with a table indicating park locations and zoning.

Appendix A was developed and included as part of the document in order to address the issue and also better satisfy the standards identified in ORS 195.120 and OAR 660-034-0040. Appendix A, on page 93, describes the information contained within each table listing all 69 park properties. It also describes the maps that are included and references sources in which specific park properties can be viewed within the context of a map showing the entirety of Douglas County. Appendix A states the following:

"The following section contains a list of all 69 designated park properties managed by the Douglas County Parks Department. The list of parks is broken into the three categories of Active, Passive and Unclassified identified with the plan. The list includes the name of the park, the zoning of the park, its location within a UGB, UUA or city limit, the total acreage of the property, the property identification number, and the Assessors Map and Tax Lot number identified for the property. At the end of each list is an aerial map showing the boundary of the park, as well as a zoning map. Please be aware that the zoning classification identified for each park can be further referenced within the Douglas County Land Use and Development Ordinance (LUDO). Each zoning classification lists the purpose of the zone; permitted uses; uses permitted with standards; and buildings and uses permitted conditionally. The LUDO can be viewed via the Douglas County Planning Department website. Additionally, further reference concerning the UGB and UUA can be found within the Urban Land Use section of the Douglas County Comprehensive Plan. The Comprehensive Plan can be viewed via the Douglas County Planning Department website.

Please be advised that the maps depicted in this document is for informational purposes and is representative in nature. It was not prepared for, or is suitable for legal, engineering, or surveying purposes. It shows the park development boundary and may not show the complete tax lot boundaries. Park representations can include, but not be limited to leases, use agreements, easements, deeds, and/or other instruments of use. Users of this information should review or consult the primary data and information sources to ascertain the usability of the information.

Maps of the entirety of Douglas County and where a specific park property is located in context of the whole county can be viewed through the following sources:

1. Parks Department webpage; Maps of Douglas County Parks
2. Official Map of Douglas County Oregon; Published in 1995 by the Douglas County Engineering and Planning Departments
3. County GIS Server; Property can be viewed with specific property identification number (R Number e.g. R12345)"
3. Lack of adequate opportunity for public participation.

Concern involving opportunity for public participation was a constant theme throughout the project. The first paragraph of page 6 outlines the opportunities presented to the public in order to comment concerning the plan.

"Over the course of the project there were many opportunities for the public to participate in the planning process. Multiple meetings were held in which public discussion occurred involving the future of the parks system as a whole and the process of developing the Local Parks Master Plan. Public meetings were held in conjunction with regularly scheduled Parks Advisory Board (PAB) meetings and attended by PAB members who acted as a steering committee for the plan. In addition to these PAB meetings, several town hall meetings were held requesting input from the public and providing updates involving the progress of the project. PAB meetings in which the Parks Master Plan was discussed as part of the agenda occurred on 09/25/15, 10/16/15, 11/20/15, 12/18/15, 01/29/16, 04/29/16, 05/27/16, 06/17/16 and 08/19/16. Three town hall meetings were held 11/17/15 (hosted by the Umpqua Valley Audubon Society), 01/29/16 and 05/16/16. All six Douglas County Planning Advisory Committees (PAC) held a public meeting concerning the plan in which public comment was given (North Umpqua PAC, 07/26/16; Coastal PAC, 07/28/16; Callahan PAC, 08/15/16; North County PAC, 08/30/16; Roseburg/Douglas PAC, 09/13/16; and South County PAC, 10/24/16). Copies of the minutes of these meetings are filed in the Douglas County Clerk’s Office. The Douglas County Committee for Citizen Involvement had three different public meetings (10/29/15, 08/04/16, and 11/03/16) in which the parks plan was included as an agenda item and project updates were received. Multiple invitations to submit written comments were provided to the public and 138 pages of written comments were received providing feedback regarding the project. Input concerning a greater reference to the 2004 Umpqua Lighthouse State Park Master Plan, Statewide Comprehensive Outdoor Recreation Plan (SCORP), and A Guide to Community Park and Recreation Planning helped in crafting a stronger Parks Master Plan. From the beginning a chronology of project events as well as presentation material was provided on the Parks Department website for the public to track and review the progress of the plan. Throughout the process, public input helped to guide and shape the Douglas County Local Parks Master Plan."

4. The park classifications of Active, Passive and Unclassified within the plan were chosen haphazardly.

The first five pages of the Park Classification and Recreational Needs Analysis section of the document (pages 18–22) provide justification for how the park classifications of Active, Passive and Unclassified were developed.

Specifically, the second and third paragraphs of page 18 identify guidelines used in making this determination. These paragraphs state,

"The document, A Guide to Community Park and Recreation Planning for Oregon Communities published by the Oregon State Parks Department in April of 2013, provides guidelines for parkland classifications and levels of service. These guidelines were utilized in helping to determine the Active, Passive and Unclassified categories."
In reference to parkland classifications the document states, “The most effective park system to develop and manage is one made up of a variety of different types of parks, open space areas, and recreational venues, each designed to provide a specific type of recreation experience or opportunity. A park system that is classified and used properly is easier to maintain, encounters less conflicts between user groups, and minimizes negative impacts on adjoining neighbors.”

The document further indicates in the second paragraph of page 22;

“In summary, the classifications; Active, Passive and Unclassified used within the Parks Master Plan were developed based on several different factors. These factors include amenities provided at the parks, the park’s size, its location, and the four park classifications most closely associated with Douglas County park properties; community, regional, nature and special use parks as provided in A Guide to Community Park and Recreation Planning for Oregon Communities as listed above.”

5. The Parks Plan is being developed solely in order to “operate the parks like a business” and obtain “self-sufficiency”.

Pages 3 and 4 indicate the purpose of a Local Park Master Plan and indicate why the plan is being developed. It also explains what the outcome of the plan should be. Although portions of pages 4 and 5 discuss the Parks Department’s need to obtain self-sufficiency, it in no way indicates that the sole purpose of the plan is to “operate the parks like a business” or obtain “self-sufficiency”.

“The purpose of a Local Parks Master Plan is to enhance local governments’ ability to provide a broad range of recreational activities to the area. The plan enables uses which would otherwise not be allowed, unless a more difficult and limiting statewide planning goal exception process was to occur.

The Local Parks Master Plan also serves as a visionary and strategic document intended to guide future actions involving amenities provided at a local jurisdiction’s park properties.

It’s for these two purposes the Parks Department first explored the option of creating a Local Parks Master Plan with the assistance of the Planning Department. The Parks Department desired to construct a few yurts and/or camping cabins as part of the summer of 2015 campground expansion planned for Whistler’s Bend Park west of Glide. They discovered that based on state law the number of yurts allowed within a campground was limited to no more than one-third of the camping spaces or a maximum of 10 campsites and that site built camping cabins and/or more intensively developed recreational uses were prohibited entirely without a Local Parks Master Plan.

The project was designed to have a three part outcome. First, to help guide future actions and activities for Douglas County park properties. Second, to develop smaller mini park plans for active recreational facilities. Third, to update and amend the Comprehensive Plan with the new information provided within the Local Parks Master Plan.”
6. The Parks Master Plan does not include information concerning the Parks Department budget or how parks will continue to be maintained.

Including specific budget information or park maintenance strategies is not a standard required within a parks master plan. As a result, Parks Department budget issues and maintenance policies are not an action associated with this plan. Decisions concerning the Parks Department budget or individual park maintenance management are issues that rest with the PAB, in which citizens may continue to participate.

The last paragraph of page 10, indicates the position which the parks department budget and maintenance policies has in the document.

"The Parks Master Plan will serve as a source from which to develop Comprehensive Plan amendments. One of the purposes of the Parks Master Plan is to help guide future actions and activities involving amenities at Douglas County park properties. It is not an all-inclusive document designed to answer all future questions or problems facing the Parks Department. The document is designed to complement the Douglas County Parks Department Policy Manual, and the Park and Recreational Element of the Comprehensive Plan. It is not an operations, maintenance or capital improvement plan. Instead, its purpose is to enhance existing documents by aligning its objectives with their existing goals and policies."

7. The Parks Plan should contain more information about parking fees and where future parking fee boxes will be located.

The purpose of implementing a parking fee was to generate enough revenue to help the Parks Department become self-sufficient and no longer have to rely on the general fund. This is not the purpose of the Parks Master Plan. Specific budget strategies and information is not a standard required within a parks master plan.

Information regarding parking fees was included within the Park Classification and Recreational Needs Analysis. The purpose of including this information was to better identify the number of people visiting specific parks. Not all park properties have a parking fee boxes, but those that do were analyzed.

The last paragraph on page 25 and all of page 26 displays this information.

"In addition, to recreational needs analysis provided by the state within, A Guide to Community Park and Recreation Planning for Oregon Communities and the 2013 – 2017 SCORP, Douglas County as a result of the newly instituted parking fees has been able to analyze park usage based upon fees collected at 24 parks that have park fee boxes. This information helps to better identify the number of people visiting specific parks within the county and justify future amenities. For example, the table below indicates the approximate revenue generated for the majority of fiscal year 2015/2016 from the following parking fee boxes within the parks system. It should be noted that the Active classified parks in most situations generate a larger revenue stream than Passive classified parks and thus one can conclude that they serve a larger number of park users."
<table>
<thead>
<tr>
<th>PARK PROPERTY</th>
<th>CLASSIFICATION</th>
<th>PARKING FEES</th>
</tr>
</thead>
<tbody>
<tr>
<td>PARKING FEES (HAPPY VALLEY BOAT RAMP)</td>
<td>Passive</td>
<td>$83.00</td>
</tr>
<tr>
<td>PARKING FEES (COLLIDING RIVERS)</td>
<td>Passive</td>
<td>$108.00</td>
</tr>
<tr>
<td>PARKING FEES (RIVERSIDE BOAT RAMP)</td>
<td>Passive</td>
<td>$225.25</td>
</tr>
<tr>
<td>PARKING FEES (THE NARROWS)</td>
<td>Passive</td>
<td>$309.00</td>
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<td>PARKING FEES (O.C. BROWN)</td>
<td>Passive</td>
<td>$395.06</td>
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<td>PARKING FEES (BUNCH BAR)</td>
<td>Passive</td>
<td>$794.05</td>
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<td>PARKING FEES (SAWYER RAPIDS BOAT RAMP)</td>
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<td>PARKING FEES (SCOTT CREEK BOAT RAMP)</td>
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<td>PARKING FEES (HESTNESS LANDING)</td>
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<td>Active</td>
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<td>PARKING FEES (SINGLETON)</td>
<td>Active</td>
<td>$2,271.80</td>
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<td>PARKING FEES (CLEVLAND RAPIDS BOAT RAMP)</td>
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<td>PARKING FEES (MILDRED KANIBE DAY USE &amp; EQUESTRIAN)</td>
<td>Active</td>
<td>$2,800.70</td>
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<td>PARKING FEES (STANTON)</td>
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<td>PARKING FEES (ATV STAGING AREA)</td>
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<tr>
<td>PARKING FEES (BEN IRVING)</td>
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<td>PARKING FEES (CHIEF MIWALETA)</td>
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<td><strong>TOTAL</strong></td>
<td></td>
<td><strong>$197,448.53</strong></td>
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8. All park property should be zoned PR and the county is using the parks master plan process to undermine applicable laws.

Comments have been made that the Parks Plan should be scrapped and that all park properties need to be zoned Public Reserve (PR), which could prevent park property from being divided, sold or possibly logged. Douglas County is fortunate in that much of its park property is zoned PR. This zoning allows for more flexibility in development then if the property were to have a resource zoned designation, such as farm or forestland. It should be noted, however, that the PR zone does not provide for the same flexibility regarding park/campground development that a parks master plan provides. Limitations surrounding yurts, cabins and other amenities still exist. This is why provisions for parks master plans are provided within the law.
In addition, the PR zone does not have a minimum lot size requirement, does not prohibit one's ability to partition a property, and does not prohibit the ability for one to log their property. Page 11, of the document references the flexibility a parks plan provides in relationship to regulations required in farm, forest or PR zones.

“One of the benefits of having a Parks Master Plan is that local governments may permit park uses on agricultural or forest lands as provided in OAR 660-034-035(2)(a-g), or within the Douglas County Public Reserve (PR) zone that would otherwise not be allowed without a goal exception to statewide planning goal #3 (Agricultural Lands) or goal #4 (Forest Lands). The goal exception process is challenging and time consuming. It can often result in additional limitations. As a result, goal exceptions are rare and are applied for infrequently.

Subsection (2)(a), of OAR 660-034-035, indicates that on designated farm or forest lands campground areas can include “recreational vehicle sites; tent sites; camper cabins; yurts; teepees; covered wagons; group shelters; campfire program areas and/or camp stores”, if a master plan is adopted by the local jurisdiction.

This Parks Master Plan would enable Douglas County to allow for yurts and camping cabins which will help satisfy a need for additional camping amenities at existing campground facilities that would otherwise be prohibited.

The State of Oregon added to applicable parks planning rules the opportunity to develop parks master plans. This amendment to the statewide planning program was designed to provide an opportunity to state and local government to better address park and recreational needs.”

9. Concerns from citizens regarding the development of a campground at Scottsburg Park.

The fourth paragraph on page 80 of the plan indicates that a concern involving a possible campground at this park was expressed by some citizens of Scottsburg.

“The Parks Department has explored the possibility of adding a campground to the park. The campground would utilize portions of the playing field and area upriver adjacent to the playing field not currently developed. Concerns involving the campground itself and the number of spaces provided in the campground were expressed by the public and the PAB. The Parks Department has indicated that future public meetings would be held involving the community if further conceptual plans were to be created for the park concerning a campground.”

10. Concerns from citizens regarding the development of RV spaces as part of a campground at the Coastal Visitor Center.

Concerns have been expressed that a campground at the Coastal Visitor Center utilizing RV spaces would not be consistent with the 2004 Umpqua Lighthouse State Parks Master Plan. The second and third paragraphs of page 49 of the document provides information concerning how the proposed amendments to the Coastal Visitor Center fits within the policies and guidelines presented in the Umpqua Lighthouse State Parks Master Plan.
“The Coastal Visitor Center property is included within the 2004 Umpqua Lighthouse State Parks Master Plan. The information provided within this mini plan is designed to enhance the Umpqua Lighthouse Plan and ensure implementation of management guidelines regarding the Coastal Visitor Center. Figure 3.3 is a map of the Umpqua Lighthouse Planning Area Development Concept which identifies the Coast Guard historic area. The Umpqua Lighthouse Master Plan references Douglas County interests on page 38 and 39 of the plan. In general, the County’s interests were to consolidate, simplify and improve the public land management of the area for multiple uses, add to the County’s recreational land base, and manage ATV activity and provide better ATV facilities. These goals were impart achieved shortly after the adoption of the Umpqua Lighthouse Plan with the transfer of land from the Oregon Parks and Recreation Department, the development of Half Moon Bay campground, and the ATV Staging Area. In addition, the County also envisioned the ability to provide recreational growth and expand the tourism economy by developing quality tourist facilities at the former Coast Guard station and expanding camping opportunities within the area.

This section of the Umpqua Lighthouse Plan clearly indicates that developing quality tourist facilities at the former Coast Guard station and expanding camping opportunities within the area were a priority of the county. Although it does not specify how this goal was to be achieved it certainly does not prohibit the use of a possible RV campground as a feasible way of ensuring the county’s interests are met. Compatibility with the surrounding use will be vital in order to ensure any future use is consistent with the Umpqua Lighthouse Plan. Concerns involving the need to minimize impacts on the view and sound shed of the historic area will need to be addressed as part of any future plan.”


Concerns were expressed that the size of any possible campground expansion would exceed the size recommendations referenced within the Umpqua Lighthouse Plan. Pages 57 and 58 identify how the proposed campground expansion at Half-Moon Bay is consistent with the Umpqua Lighthouse Plan.

“Expansion of Half Moon Bay is feasible, although the size of the expansion, including the number of future RV spaces/tent sites or possible yurts or camping cabins is not determined as part of this plan. The Umpqua Lighthouse State Park Master Plan helps provide information concerning Douglas County’s ability to expand this campground.

In 2004, at the time of its adoption an additional ATV campground facility was identified south of Half Moon Bay and the ATV staging area within the Umpqua Lighthouse State Park Master Plan. The location is identified at the south end of the map in Figure 4.8, and is labeled, Campground with ATV Riding Access, Location proposed by OPRD, Described in this Chapter, Illustrated in Appendix A. Although only provided as a conceptual drawing, this identified area is approximately the same size as Half Moon Bay campground. Chapter 10 of the Lighthouse Plan, entitled Goals and Strategies indicates OPRD’s recommendations to other agencies (including Douglas County) for the use and management of their lands. Within this chapter, it indicates OPRD’s preference that only one campground be developed within the planning area. If that campground were to be sited at the southern location of Figure 4.9, which was under the ownership of OPRD but is now under the ownership of Douglas County, sign-off would need to be provided by the Director of OPRD.
The proposed expansion of Half Moon Bay will maintain only one campground facility in the area as preferred by OPRD and is not subject to OPRD approval as it is not part of the land originally owned by OPRD. Half Moon Bay was developed on land that was transferred to the county from the BLM and as such is not subject to size recommendations offered by OPRD.

Although it was not the preference of OPRD that two campgrounds be constructed within this area, the opportunity for two campgrounds is provided as part of the sales agreement between OPRD and the county. Figure 4.9, shows the conceptual drawing of the group ATV campground as identified for the area and referred to as Appendix A at the end of the Umpqua Lighthouse State Park Master Plan document. This conceptual drawing provides evidence that the Umpqua Lighthouse Park Plan anticipated additional ATV growth beyond what is now happening.

Coordination with Oregon Parks and Recreation Department, Army Corps of Engineers, US Coast Guard and the US Forest Service assist in assuring compatibility with the Umpqua Lighthouse State Park Master Plan and surrounding uses on adjacent property.“

12. The parks master plan does not sufficiently address future development issues surrounding floodplains, wetlands, historic resources, geological hazards, riparian vegetation, etc.

Throughout the Parks Plan information is provided indicating that future development of any park properties will be subject to site review and applicable development standards. For example, Scottsburg Park is located in the floodplain and in the first paragraph of page 80, it states the following:

“The entirety of this portion of the property is located within the floodplain. Any future development would require adherence to specific floodplain regulations contained within the Douglas County Land Use and Development Ordinance.”

Within the park mini plan section for The Coastal Visitor Center it indicates the importance of future coordination as possible plans are further developed.

Regardless of the type of future amenities provided at the park it should be noted that compatibility with the Umpqua Lighthouse State Park Master Plan will be required. As indicated within the plan coordination and consultation with the Douglas County’s Historic Resource Review Committee, State Historic Preservation Office (SHPO), and Oregon Parks and Recreation Department will be required to ensure the development is consistent with its historic character. Requirements as set forth within the Douglas County Land Use and Development Ordinance Chapter 9, Cultural and Historic Resources Conservation, will be applied. Excavation within the area will need to conform to the requirements outlined by SHPO and could involve an archeological assessment.”

Further information is provided on page 11, under Policy #3 regarding development of park facilities within the floodplain. This section also references other applicable development review.

"Future development to parks located within the floodplain regardless of their status within an Active, Passive or Unclassified category will be required to be developed in accordance with floodplain requirements. Additionally any development affecting wetlands, riparian vegetation, proximity to geological hazard areas, or
other similar type of development constraint will be required to be reviewed and developed in accordance with the applicable regulations identified within the Douglas County LUDO."

Be aware that at the hearing on Thursday staff will be prepared to further discuss the next phase of the project that will include an amendment to the Park and Recreation Element of the Comprehensive Plan during the spring of 2017. Thank you for reviewing this material. Please feel free to contact me at 541-440-6069, if you have any questions. As always I appreciate your service on the Planning Commission and your assistance on reviewing this important project.