Mr. Stuart Cowie  
Douglas County Planning Department  
1036 SE Douglas Ave.  
Roseburg, OR 97470

June 8, 2016

Dear Stu:

Thanks for your on-going efforts to prepare the best possible Douglas County Local Parks Master Plan 2016. This second iteration of the Draft is much improved over the first. I do have a few suggestions to make it even better.

**GENERAL COMMENTS**

**Map and Website** – Can you possibly just reference a map and/or website that clearly show location of 69 properties? Do such items even exist? Please note that a map (showing boundaries and location) is **required** in a local parks master plan by Oregon Administrative Rule (OAR) 660-034-0040 (Planning for Local Parks). I was pleased to see that narrative on page 16 of the plan commits to the Parks Department creating, on their website, “maps of all 56 developed park properties classified as either active or passive…” Can a projected timeframe and anticipated completion date be identified for completion of these important items?

**Table** – It sure would be nice if there was a table in the plan that clearly listed all parks along with legal location, zoning categories, map plan designation, size (in acres) activities, developments, management issues (e.g. lack of access), SCORP classification (regional, community, specialized use, nature), and County classification (active, passive, unclassified). Please note that some of these items are required in a local parks master plan by Oregon Administrative Rule (OAR) 660-034-0040 (Planning for Local Parks). Others are recommended by the SCORP “Guide to Community Park and Recreation Planning for Oregon Communities.” Build a table with as much info as is currently available.

There’s a good paragraph summary of the County’s recreation opportunities on the top of page 22, and this indicates that such information is available. Thus, it would be excellent
if a table showed park-by-park tracking of opportunities in addition to the other information suggested above.

Another very important reason for such a table is because the master plan states (on page 22) that the County’s classification (active, passive, unclassified) was based on such factors as park amenities, size, location and four classifications from the SCORP. Thus, at a very minimum, these four items for each park should be readily available and can be easily transferred into a table showing the County’s logic trail and thought process leading to its own classifications of each park.

**Zoning** – The OAR requires “appropriate zoning categories and map designations (a ‘local park’ zone or overlay zone is recommended), including objective land use and siting review criteria, in order to authorize the existing and planned park uses described in local park master plan.” Thus, it seems critical to me that each park be listed along with its current and proposed zoning as part of this Comprehensive Plan amendment. Many publics advocate for all 69 parks to be “Public Reserve.” While this may or may not be feasible, the Master Plan would be much clearer if there was some documentation and understanding about current and proposed zoning designations for each property covered by the master plan. Several active or passive parks with mixed zoning might also be best served by changing their zoning to “Public Reserve.”

**Public Input** – Thanks for beefing up this section. During the local master planning process, there were many chances for public input. Providing the actual dates of the town hall meetings, PAB meetings, and comment periods would be very good documentation right in the plan. This would only require a few more sentences on pages 5-6 and 16-17 of the plan.

**References Cited** – Thanks for adding references cited at the end of the plan. I would encourage you to also reference three additional items. One is the two-page memo that documents the results and recommendations of the 2013 Kanipe committee planning process. That could even be included as an Appendix to the plan so there’s good tracking, documentation and accountability for what the recommendations were, and which were accepted by the Board of County Commissioners. Another item that needs to be referenced is the Department Parks Policy Manual, mentioned on page 8 of the plan. The third item in need of reference is the updated Adopt-a-Park policies.

**County’s “Self-Sufficiency” Policy** – This iteration of the Draft plan now has several references to this policy, a table showing parking fees, and info on volunteerism,
partnerships, Adopt-a-Park and other actions. I’d recommend that you provide a reference to the newly updated Adopt-a-Park policies, and include such in the References Cited section. It would be nice if there was some quantification of the volunteer hours and value contributed to the Parks Department, but that info may not be readily available. If not, I hope the Park Department starts tracking the amount of volunteer hours contributed. Identify the parks where the Rogue Valley Young Marines and South Umpqua Elk Creek Restoration Project have Adopt-a-Park agreements. In fact, it wouldn’t hurt to acknowledge all such agreements in place at this time. I’ve heard that the Friends of Carl C. Hill Wayside have signed one.

**Special Events** — It would be nice if the table listing special permitted events had them in chronological order. I wish the table could show the income generated by each event. The County Parks Department would be wise to update their policies for special permitted events to ensure consistency, cost recovery and income generation. Narrative about “special event permits” is currently found on pages 27-28 in the section about active parks. I’d recommend the permit info be given its own section as the events occur in both active and passive parks. There may also be more opportunities to encourage use of passive parks and channel such use to less-used parks.

**Parks Department Funding Trends** — While this iteration doesn’t summarize the last decade of income and expenses for the Parks Department, it does state that the department is now off the general fund.

**Mini-Plans** — It would be nice if there was some sense of costs for the proposed developments that have been identified. It would also be very helpful if there were statements acknowledging long-term maintenance costs, how development is in the best interest of the individual park’s resource values, and how such development would meet the oft verbally-stated “self-sufficiency” goal.

**Vision Statement** — While the plan states that it’s a “visionary and strategic document,” I sure wish that there was a more clearly stated “Vision Statement” for Douglas County Parks. Such an item is highly recommended by the “Guide to Community Park and Recreation Planning.” At present, I only occasionally see scattered references to such things as “provide a broad range of recreational activities to the area” (page 3), “enable uses which would otherwise not be allowed,” (page 3), “move toward self-sufficiency” (page 5), “meet the projected recreation needs of citizens and visitors” (pages 8 and 9), etc.
Park and Recreation Element Policies – This section has been expanded from the previous draft, and it provides better documentation of the County’s perspectives with regard to many of the park policy elements in the Comp Plan. I was happy to see references to several additional policies (e.g. 1, 3, 25, 27, 32, 33) now included. While some generic policy statements are referenced about recreation needs and developments, I’m still disappointed that you only chose to include some of the 33 park policies (and two of seven policy implementation items) from the Park and Recreation Element of the Douglas County Comprehensive Plan. You’ve now chosen 15 out of 33 to reference as “applicable.”

Perhaps you could at least list the 18 policies and 5 implementation policies that haven’t been addressed in the master plan. It would be interesting and provide good documentation of your logic trail if one sentence was provided for each to explain why they are not “applicable” to master planning.

Because the Parks and Recreation Element is only a total 15 pages in length, I continue to advocate for simply transferring all of the Element into an Appendix in the Final Parks Master Plan. As written, the Master Plan seems to give an impression that some policies are more important or relevant than others, some apply and some do not, etc. Publics dispute such unsubstantiated conclusions, and my earlier comments dated May 6, 2016 showed why all the policies have importance.

As stated before, some specific examples are Policy #4 re: preserving prime sites inside urban growth boundaries (should be referenced for parks that apply), Policy #9 re: safety applies in all publicly accessible parks, Policy #11 re: minimizing environmental damage (applies to all developments but esp. at a site like Coastal Visitor Center), Policy #12 provides guidance for a property like Thora Circle, Policy #16 provides guidance relative to Anna Drain Park, Policy #26 calls for collection of visitor use data.

Need For Visitor Use Data - The Final Plan has a clear need for better visitor use data. To date, most of your conclusions have been drawn based on staff observation and anecdotal evidence. The Final Parks Master Plan should acknowledge a need for the County to conduct its own occasional usage surveys on park lands (consistent with policy #26 in the Parks & Recreation Element). An investment in a few traffic counters might be helpful and wise. Continuing analysis of data from parking fee envelopes will also be useful.
Recreation Needs Analysis – Thanks for beefing up this section. I appreciate the clear references and material brought forward from the “Guide to Community Park and Recreation Planning for Oregon Communities (April, 2013)” and the 2013 – 2017 SCORP.

One item which was not included or referenced in the master plan is SCORP Appendix E which shows, by County, the “Percent of Population Participating in Outdoor Recreation Activities, 2011.” For me, this indicates local interest, popularity and current availability of opportunities. If one were to use Thirty (30) percent as a threshold, it’s interesting that the most popular activities among our Douglas County population are: Sightseeing/Driving or Motorcycling for Pleasure (67%), Walking on Local Streets (62%), Attending Outdoor Concerts/Fairs/Festivals (56%), Walking on Local Trail (53%), Relaxing / Hanging Out / Escaping Heat/Noise (51%), Beach Activities – Ocean (51%), Picnicking (47%), General Play at a Neighborhood Park/Playground (43%), Walking – Day Hiking on Non-Local Trails (41%), Visiting Historic Sites/History-Themed Parks (39%), Beach Activities – Lakes, Reservoirs, Rivers (37%), RV/Motorhome/Trailer Camping (32%), Exploring Tidepools (31%), Car Camping with Tent (31%), and Collecting (Rocks, Plants, Mushrooms, Berries) (30%).

Partnerships, Volunteerism and Other Creative, Innovative Approaches – Was it an oversight to not acknowledge the various grassroots “Friends” groups that have formed to assist the County with fundraising, education, maintenance, volunteer labor, expertise, advocacy, awareness, training, and more? While the County may or may not have formal agreements (e.g. MOUs) with such groups as Friends of Mildred Kanipe Memorial Park, Friends of Severt Iverson Park, Friends of Carl C. Hill Wayside, Douglas County Parks Resource Advisory Group (PARC) and others, there is much potential for collaboratively involving such groups to build trust, leverage funding, get priority work done, and obtain the County’s stated goals for “self-sufficiency” and “run the parks like a business.” The above groups all have web presence, esp. on Facebook. It would be nice to have a list of currently known groups (with goals, website and contact info) should be fully delineated in a table in the plan. Besides listing such groups, the final plan should lay forth vision and objectives as to whether or how such Friends groups will be encouraged, when agreements will be promulgated, and actions to support County parks.

Parking Fees – The program appears to be generating more income than was expected. Page 26 of the Draft plan shows fees collected during a ten-month period from July 1, 2015 to May 15, 2016. Only 14 passive and 10 active parks are listed. Do any other parks
have fee stations? The first question that comes to mind is, “Have any parking fees been collected at active parks at Anna Drain, Coastal Visitor Center, Half Moon Bay, Pass Creek, Windy Cove A, and Windy Cove B?” Why or why not? Also, how many of the passive parks have fee stations? Please explain why fees are only being collected at 14 out of 40 passive parks. What criteria were used to choose those 14 for parking fee implementation? Are there opportunities being missed to collect fees at the others?

**Active Parks within Urban Areas** – Because six of the active parks fall within urban growth boundaries or urban unincorporated areas and have “ability for more highly developed park amenities,” the Master Plan should be beefed up to identify (at least by listing) development opportunities, if any, at Anna Drain, Stanton, Windy Cove A and Windy Cove B. If there are some such opportunities, Mini-Plans may even be appropriate for Anna Drain, Stanton, Windy Cove A and Windy Cove B. If there are no such opportunities at these four, then the Master Plan should at least clearly state and document such findings. The other two parks within urban areas (Coastal Visitor Center and Half Moon Bay) are already subject to Mini-Plans, although I am not in favor of RV campground development at the National Register of Historic Places listed site built in 1939.

**Coordination with Other Agencies** – During the drafting of this master plan is the best time to coordinate and seek input from the many agencies and organizations mentioned in the plan (i.e. SHPO, State Parks, ACOE, USFS, BLM, Douglas County Master Gardeners, etc.). At a minimum, they should at least be sent a letter or e-mail alerting them to the availability of a Draft Plan, as well as encourage them to provide comments now rather than after finalization of the plan. Provide a page that summarizes the consultation that took place, as well as a summary of comments received. It appears that such coordination hasn’t taken place up front during the drafting of the plan, but will rather be done a later time prior to developments.

**SITE-SPECIFIC PARK “MINI-PLAN” COMMENTS**

**General** – Some information should be provided in the Parks Master Plan about all of the County’s “Active” park properties. A paragraph each about Amacher, Anna Drain, Ben Irving, Cooper Creek, Pass Creek, Singleton, Stanton, Windy Cove A, and Windy Cove B would certainly seem to be warranted and desirable in a County’s master plan for its parks.
**Chief Miwaleta Park** – pages 40-41 - I share the concerns about over-development of Chief Miwaleta Park. This would be a good location for a traffic counter and site-specific usage survey, etc. to provide data and further justification for future proposed actions.

**Coastal Visitor Center** – pages 46-48 - This park is home to the Umpqua River Lighthouse and Coastal History Museum. On pages 32-33 and 38 of the master plan (and within the mini-plan), you speak of goal consistency between this plan and the Umpqua Lighthouse Plan. You can’t really claim this as the latter never recommends or even mentions RV campground development at this National Register site. Clarify that consistency and compatibility will only be analyzed and concluded at a future date after development plans are prepared, and the necessary consultation takes places with the public, SHPO, OPRD, Douglas County Historic Resource Review Committee and others. I continue to feel that an RV campground here would defile a beautiful, quiet, serene, nicely landscaped historic site.

The goal should not be “to generate additional revenue in order to re-open the museum.” This park’s mini-plan needs to reference the Cultural and Historic Resources Element of the Douglas County Comprehensive Plan (please see pages 7-1 through 7-5 of the County’s Comprehensive Plan). Per Page 7-3, such development of an RV Campground would be a conflicting use in that it would be “new construction on a public or private significant historic site or in a Historic District which would alter the historic significance of the site or district.” Please also see section 9.070 and 9.080 of the Douglas County Land Use and Development Ordinance for a better understanding of how significant cultural and historic resources need to be conserved and protected, including application to their view shed, sound shed, context and environment.

I have read the 2004 Umpqua Lighthouse State Park Master Plan and have concluded:

1.) The section on “Douglas County Interests” on pages 38-39 of the State Park Plan should be referenced and summarized in the Parks Master Plan. The section speaks to acquisition of lands and “development of a parking lot to support tourism development in the Coast Guard historic area.” There’s no mention of an RV campground.

2). Your statement on page 47 of the master plan is misleading. While it may be true that the Umpqua Lighthouse Plan called for “expanded camping opportunities in the area,” there is never any mention that such expanded camping was envisioned at the National Register site.
3). Page 60 of the State Park Plan summarizes issues at the Coast Guard Historic Area. Please note that in 2004 it was the County’s plan “to enhance the cultural resource experience and scenic views associated with this site.” Volunteerism was mentioned. There was substantial local area support for the historic area plan, but there were identified needs to balance conflicting uses, manage ATV use, minimize impacts on the view shed and sound shed of the historic area and whale watching station. These conclusions are now referenced in the mini-plan. This reaffirms in my mind that a 16-space RV campground at the site would neither have local support nor be compatible with the historic site.

4). I refer you to Chapter X “Goals and Strategies” in the State Park Plan and feel that those applicable to the Coastal Visitor Center and Half Moon Bay should be clearly referenced in the Final Douglas County Parks Master Plan. As an example, item #6 states that “OPRD will support development of parking for the Coast Guard historic site on state park land … As needed, the parking may be shared with OPRD for trailhead parking in support of planned trails and extra vehicle parking for campers at Lake Marie.” There is no mention of OPRD supporting an RV campground at this National Register site. Coordination now with OPRD and SHPO would probably confirm their lack of support for an RV campground at the National Register site.

5). Chapter XIII “Scenic Resource Management Guidelines” in the State Park Plan should be clearly referenced in the Final Douglas County Parks Master Plan. I refer you to the statement that “Views from the lighthouse and Coast Guard historic area and whale watching station should be paramount in making decisions that will affect areas that are within the view shed of these facilities …”

6). Chapter XIV “Cultural Resource Management Guidelines” in the in the State Park Plan should be clearly referenced in the Final Douglas County Parks Master Plan. Coordination is needed now, and it would be beneficial to have the Final Parks Master Plan document any input received from the State Historic Preservation Office (SHPO) and Douglas County Historic Resource Preservation Review Committee.

I conclude that an RV campground development would be incompatible with the historic, natural and aesthetic values of this site on the National Register of Historic Places. Instead, this is an ideal place to pursue partnerships, volunteer use, and/or a community-minded organization to leverage funds and provide in-kind donations for museum operation. Build collaboration by encouraging a more active “Friends of the Umpqua
Lighthouse” group. These ideas are far from new or innovative for park management, and they should be recognized as valuable tools in the park department’s tool box. Please include a section in the Final Parks Master Plan that encourages such, esp. in fiscally-austere times such as these.

**Half Moon Bay**, page 54-56: Summarize the results of coordination with OPRD, USFS, ACOE and USCG during the preparation of this plan. Further, the “mini-plan” for this park doesn’t seem to draw any substantiated conclusions or recommendations. It references the 2004 Umpqua Lighthouse State Park Plan, 2007 land use application for a 10-space equestrian campground, and 2013 conceptual drawings for expansion. However, your conclusion only seems to call for more holistic study of the equestrian and RV campground expansion (“in conjunction with each other in the event more permanent plans are developed.”)

Half Moon Bay would be a good location for a traffic counter and site-specific usage survey, etc. to provide data and further justification for future proposed actions.

**Mildred Kanipe**, pages 65-67: Summarize the results of coordination with SHPO and Douglas County Historic Resources Review Committee during the preparation of this plan. The many stakeholder groups that served on the April-October 2013 committee (“to develop a management plan”) for this park should be directly contacted at this time and encouraged to submit comments on the Parks Master Plan and “mini-plan” for Kanipe Park. The finalized master plan should include and clearly summarize results of public comment received.

A case could be made for this master plan and comp plan amendment to change the entire zoning of Kanipe Ranch to “Public Reserve.” This would clearly acknowledge its importance as a park and legacy for future generations.

Kanipe Park would also be a good location for a traffic counter and site-specific usage survey, etc. to provide data and further justification for future proposed actions. I believe that this park has a very high priority need for a management plan. Rather than being driven by a directive that this park be “financially self-sufficient,” a management plan should identify the park’s multitude of resources, issues, opportunities, alternatives and recommendations. The County should manage this park with a primary goal of leaving a legacy for future generations. Fees, grants, volunteerism and partnerships could be used to achieve success. I also support the public’s idea to plant shade tree in the campground.
River Forks, pages 72-74: Summarize the results of coordination with the Master Gardener’s Assn. during preparation of this plan.

River Forks is a crown jewel of the County parks system, and it would be a good location for a traffic counter and site-specific usage survey, etc. to provide data and further justification for future proposed actions.

I support such ideas as new park entry, community center, celebration space, dog exercise area, trails, interpretation and ADA-accessibility. The current pavilion is large and accommodating. The Parks Master Plan (and mini-plan) do not provide usage data for this park and pavilion. I don’t currently feel there is any supportable need for a large capital investment to construct a new pavilion closer to the river. To access the river, people should be encouraged to walk the short distance necessary from the existing pavilion. An interpretive trail from the existing pavilion to the river could be designed to enhance this outdoor experience.

Scottsburg, page 77: This would be a good location for a traffic counter and site-specific usage survey, etc. to provide data and further justification for future proposed actions.

To protect the view shed and outdoor experience at this park, I would encourage the County to re-zone all 89 acres as “Public Reserve.” In keeping with the referenced Needs Analysis (from SCORP documents), it seems that picnic, day-use, and pavilion facilities might be best here. No conceptual plan has been developed to address feasibility and ideas for a campground here. The mini-plan should call for such, and it’s possible that a graduate level landscape architect student could accomplish this at little or no cost to the County.

Whistler’s Bend, pages 81-83: The entirety of this 174-acre park is zoned Public Reserve. I support many of the ideas being considered for this park (pavilion, yurts, cabins, new parking area for group campground, interpretive trails, and river access trails). This would be a good location for a traffic counter and site-specific usage survey, etc. to provide data and further justification for future proposed actions. I would further encourage you to see if the unclassified “Whistler’s Bend Overlook” property could be connected via a trail system that provides for extended hiking and nature study from the main Whistler’s Bend park property.

PAGE-BY-PAGE COMMENTS and SUGGESTED EDITS
1) Page 14, Are you sure that future amendments to this Master Plan will “require a public hearing process”? I would think that some annual plan maintenance or minor changes could be made without having to hold a public hearing. I’d like to see flexibility given so the Parks Department can use this as a working tool for strategic goal achievement. Clarify what and how minor changes can be made to the plan to allow for adaptive management as new information, grants, changing goals, etc. come to light. Clarify what changes would require a public hearing. My guess is that they would only be changes that would amend the Comprehensive Plan.

2) page 28: Half of the 16 active parks are considered Regional Parks. Please identify in the document what the other half (eight parks) would be considered as.

3) Figure 1, pages 29-32: For each park property in the table, I’d recommend that the events be listed chronologically (rather than randomly). The table would be even better if the three columns were in the order of Park Location, Subject and then Start (chronologically).

4) Page 32, second paragraph and last paragraph: My perusal of the 2004 Umpqua Lighthouse State Park Master Plan concludes that it only addresses very limited improvements deemed “consistent” (land acquisitions, parking lot). It’s not factual to say the Parks Department is “revisiting possible improvements to the Coastal Visitor Center consistent with the Umpqua Lighthouse Plan.” See my comments above re: Coastal Visitor Center. In fact, I believe that an RV campground at the historic site would be a “conflicting use.” The Mini-Plan should also clarify as whether there are still needs for land acquisition, trailhead and/or parking lot development.

5) page 33: It’s misleading to say that “This information helps to ensure that this Parks Master Plan is consistent with the goals of the Umpqua Lighthouse Plan.” No info is presented that, in my mind, substantiates the consistency of a 16-pace RV campground at that site listed on the National Register of Historic Places.

6) page 35: Identify the 24 passive parks (out of 40) that are considered “Special Use Parks.” Identify which SCORP category the other 16 fall into (nature park, community park, etc.)

7) page 35: Specifically list those seven parks that are on property leased by the County or in ODOT ROWs.
8) page 36: would all 13 of the Unclassified parks be considered “Nature Parks” (under the SCORP classification system)? Do all of them lack public access? This came up at the town hall meeting and should be further documented and explained.

9) page 36: Please add a sentence at the end of this page to emphasize that public input will be solicited for any proposal to log, sell, exchange park properties.

10) Page 73: You mention the “Pepsi Float” as an annual event, but I don’t see it listed in Figure 1 that lists special event permits.

OTHER

1). As stated in the section on cooperation with other agencies, I encourage the County to keep looking for County-owned parcels along the North Umpqua River corridor to sell and be incorporated into the BLM’s wild and scenic river system. Such an approach would also be consistent with identified needs in the SCORP, the Park and Recreation element of the County Comprehensive Plan, and public comment received for trail development and improved river access. It would generate income for the County, as well as keep tracts in public ownership by agencies with more secure budgets.

Thank you for the opportunity to comment. Should you have any questions or need clarification of any items, please do not hesitate to contact me at 541-673-9759 or via email to RossJoe@Hotmail.Com

Respectfully,

Joe Ross

c.c.:
- Douglas County Commissioners
- Douglas County Park Department, Attn: Mr. Gary Groth
Planning for Local Parks

(1) Local park providers may prepare local park master plans, and local governments may amend acknowledged comprehensive plans and zoning ordinances pursuant to the requirements and procedures of ORS 197.610 to 197.625 in order to implement such local park plans. Local governments are not required to adopt a local park master plan in order to approve a land use decision allowing parks or park uses on agricultural lands under provisions of ORS 215.213 or 215.283 or on forestlands under provisions of OAR 660-006-0025(4), as further addressed in sections (3) and (4) of this rule. If a local government decides to adopt a local park plan as part of the local comprehensive plan, the adoption shall include:

(a) A plan map designation, as necessary, to indicate the location and boundaries of the local park; and

(b) Appropriate zoning categories and map designations (a "local park" zone or overlay zone is recommended), including objective land use and siting review criteria, in order to authorize the existing and planned park uses described in local park master plan.

(2) Unless the context requires otherwise, this rule does not require changes to:

(a) Local park plans that were adopted as part of an acknowledged local land use plan prior to July 15, 1998; or

(b) Lawful uses in existence within local parks on July 15, 1998.

(3) All uses allowed under Statewide Planning Goal 3 are allowed on agricultural land within a local park and all uses allowed under Statewide Planning Goal 4 are allowed on forest land within a local park, in accordance with applicable laws, statewide goals, and rules.

(4) Although some of the uses listed in OAR 660-034-0035(2)(a) to (g) are not allowed on agricultural or forest land without an exception to Goal 3 or Goal 4, a local government is not required to take an exception to Goals 3 or 4 to allow such uses on land within a local park provided such uses, alone or in combination, meet all other statewide goals and are described and authorized in a local park master plan that:

(a) Is adopted as part of the local comprehensive plan in conformance with Section (1) of this rule and consistent with all statewide goals;

(b) Is prepared and adopted applying criteria comparable to those required for uses in state parks under OAR chapter 736, division 18; and

(c) Includes findings demonstrating compliance with ORS 215.296 for all uses and activities proposed on or adjacent to land zoned for farm or forest use.
Stuart, thank you for giving public the opportunity to review Park Plan draft. I read through all of the comments and two things stand out to me.

1. Opportunity for new Park Director to have input. I realize new director has not been hired and that waiting for this position to be filled may delay final plan, but, with Gary Groth leaving next month, it just seems that it would be prudent to have buy-in from new director.

2. Opportunity for public to have one final stab at commenting on plan prior to finalization. Obviously, this draft, comment, draft cycle cannot continue over and over, but with the huge response you received, there were numerous changes. Additionally, I believe the PAB also has a chance to comment and it would be nice to see their comments in a final draft.

Thank you.

Midge McGinnis
Equestrian user of Mildred Kanipe Park