

Sitka Sedge State Natural Area

Compiled Public Comments in Response to Draft Master Plan

May 1, 2016 - June 2nd 2016



Nature

HISTORY

Discovery



Land of Cheese, Trees and Ocean Breeze

Board of Commissioners
Mark Labhart, Bill Baertlein, Tim Josi
201 Laurel Avenue
Tillamook, Oregon 97141
Phone 503-842-3403
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TTY Oregon Relay Service

May 4, 2016

Lisa Sumption, Director
Oregon Parks and Recreation Department
725 Summer Street NE, Suite C
Salem, OR 97301

RE: Beltz Farm

Dear Ms. Sumption:

The Fisherman's Advisory Committee for Tillamook County (FACT) has brought to our attention the existence of a partially functioning tide gate located under an old dike at the recently acquired Beltz Farm. This dike has been used as an access trail for many years by the neighboring community. We have been told that many years ago anadromous salmon were observed accessing the two creeks above the tide gate for spawning purposes. The tide gate appears to have blocked upstream spawning habitat.

It would be wonderful to see these streams open again and available for salmonid spawning purposes. We know you are in the middle of a planning process to develop a new state natural area and we would appreciate consideration of replacing the old tide gate with a pedestrian bridge.

We are aware of the associated cost of a bridge. We are also aware of the potential flooding issues in the Tierra Del Mar area connected with the transition from freshwater habitat to marshland habitat and understand and approve of your go-slow strategy to observe any negative impacts.

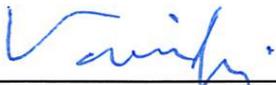
We look forward to working with you as you determine the best path forward for this wonderful new state natural area.

Sincerely,

BOARD OF COMMISSIONERS FOR
TILLAMOOK COUNTY, OREGON


Mark Labhart, Chairperson


Bill Baertlein, Vice Chairperson


Tim Josi, Commissioner

May 30, 2016

Ben Hedstrom, Design and Planning Coordinator
Integrated Park Services Section
Oregon Parks and Recreation Department
725 Summer Street N.E., Suite C
Salem, OR 97301

Re: Sitka Sedge State Natural Area

Dear Mr. Hedstrom:

Following are my comments to be included concerning the development of the Sitka Sedge State Natural Area.

Trail surfacing: I would like to see a "natural surfacing" like wood chips where possible. Gravel would be appropriate if needed to support service vehicles but otherwise a softer surface would be more pleasant to walk on and quieter base for nature study. The Current plan to gravel the dike is totally appropriate.

Trail System: The current length of planned trails seems very adequate and well designed using historic routes. I would like to see the trail named that access's the beach called "Beltz Farm Beach Trail" to maintain the historic connection. It would be nice to have a trail system that also goes east into the forest. That is not in the plan but prior to final adoption, have some mention of it to allow development in the future.

Parking Area: It needs to be larger or have a designated overflow area. There is just so much pressure on any place that isn't 90° in the summer that Sitka Sedge will have to take some of it, and they need a place to park. The current plan is beautiful but when cars line up along Sandlake Road that all changes and it looks dangerous. Maintaining regulatory signs is tough with them often being pulled over (I heard the one is/was down at the Snowy Plover area). Having a place to park is good for the local economy also.

Facilities: Recreational use will come, so get ready. A flush toilet adds so much to the experience and should be built into the current plan, rather than remove and replace the vault. At other local recreational sites different ethnic groups see a vault and then use the waste bucket, but they know what a flush toilet is. With a caretaker, it seems like maintenance would not be that much of an issue. I would also like to see a porta potty/ vault at the primary wildlife viewing station. Encourage people to linger and not leave little white bombs everywhere.

I do not think there is enough information yet to make a good decision on the dike breaching/ fish passage structure. From a Salmon Super Highway perspective dike breaching with a wide opening certainly meets the fish passage objective. From a water table impact on Tierra Del Mar and potential economic loss, I don't know.

Thank you for the opportunity to comment.

Yours truly,



David Wells
2390 Nielsen Road
Tillamook OR 97141

From: sandygunder@comcast.net
To: [HEDSTROM Ben * OPRD](#)
Subject: Beltz Property Master Plan
Date: Tuesday, May 31, 2016 6:05:37 PM

Dear Ben-

I am writing to you regarding the Beltz Property Master Plan. We have owned a cabin in Tierra del Mar since the mid 1960's and have become very concerned about the proposal to breach the Beltz dike. We have noticed an increased amount of water in our little community and in fact, record flooding on our street this past winter with some residents unable to flush their toilets.

We are worried that your plan will greatly contribute to an increased water table and result in flooding of our properties. We would like the proposed breach to be excluded from your plan or at a minimum, delayed until multiple water testing is done through out the year (especially during the winter and spring months), to get an accurate measurement of the water table.

Thank you,

Sandy Gunder

From: [Nancy England](#)
To: [HEDSTROM Ben * OPRD](#)
Subject: Beltz Property Master Plan
Date: Sunday, May 29, 2016 10:21:16 AM

To whom it may concern: Dennis and Nancy England have owned property in Tierra del Mar since the early 1970's. We want to be on record as opposing any dike breach proposed on the Beltz Property. To say, "trust us it will be fine" is not good enough. This is putting at risk the people and their property in this region that has been a small tight community for decades. This is also a real wildlife area where we personally spotted 2 bull elk grazing this past week. Thank you.

Dennis & Nancy England



PUBLIC WORKS DEPARTMENT

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TTY Oregon Relay Service

Land of Cheese, Trees and Ocean Breeze

June 06, 2016

Ben Hedstrom
OPRD Design & Planning Coordinator
725 Summer St. NE Suite C
Salem, OR 97301-1266

RE: Beltz Property – Sitka Sedge Natural Area Master Plan

Dear Ben,

Tillamook County Public Works appreciates the opportunity to participate in the Master Planning phase of the Sitka Sedge Natural Area planned for development in the coming year. We have attended public meetings held here in Tillamook County where the plan has been presented. We have heard much of the response from agency and residents impacted by the project and are happy to provide the following with regards to the transportation system in the area.

We do have some concerns with the current plan that we will describe here, although we do not consider any of our concerns to be unsolvable through the site design process.

One of our concerns is that the Master Plan is being presented with a design commitment for a parking lot located in the northerly most existing pasture area. This is the access point that the KPFF “Final Access Study” identifies as “Site A”. While Land Use regulations are administered through the Tillamook County Planning Department, we are aware that this area is shown as an ‘A’ zone on the current FEMA FIRM mapping system. The next pasture to the south, just south of where Reneke Creek currently crosses Sand Lake Road, is above the ‘A’ zone elevation. We have experienced considerable administrative requirements for construction of replacement roadways in these zones which leads to our concern that the Master Plan could very well be required to be changed immediately to conform to Federal regulations. In essence, we feel that this issue should be better vetted through the Tillamook County Planning process before the master plan is considered complete.

Also associated with the parking lot location is the current OPRD evaluation of the KPFF description of access “Site C”. At the meetings that I attended part of the justification for siting the proposed parking lot at the Site A location has been challenges to sight distance to the south at the Site B location. However, page 7 of the KPFF technical memorandum indicates that relocation of fencing and removal of vegetation would likely lead to achieving approvable sight distances. From my field observations I agree with the KPFF memorandum and suggest that Site C would be the better location for access to and from Sand Lake Road.

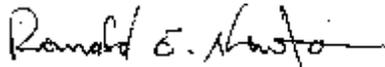
For any of the access points to the Sand Lake County Road it will be likely that we will require a deceleration lane along the west side of the roadway. The detail of this can be developed in the Civil Design process.

Locating the parking facilities at Site C will require some pedestrian development that crosses Reneke Creek and connects the parking area to the Reneke Dike for further access to the beach areas. Public Works recommendation for this is that pedestrian access be by way of trails that are outside of the Right of Way of Sand Lake Road, removing the potential conflict between pedestrian and vehicular traffic.

Public Works agrees with some of the concerns expressed by the residents of Tierra Del Mar at the public meetings. While we understand that OPRD has commissioned a thorough hydraulic study to determine impacts associated with breaching the dike, our concern is for the road system within the Tierra Del Mar community. The roads in the area are fragile, at best, and with any increase in ground water saturation or storm event inundation the roads will almost certainly be negatively impacted. In the early meetings that I attended it appeared that the hydraulic study would eventually prove that a breach of the dike would have no negative impact on the Tierra Del Mar community. However, we are not aware if there has been a completion of the hydraulic that would verify what the impact to the community would be. It is our recommendation that the hydraulic study be completed and the resulting information be made available to all of the parties involved, (Regulators and community members), before the Master Plan is formalized as a completed document.

Thank you for this opportunity to comment.

Respectfully,

A handwritten signature in black ink that reads "Ronald E. Newton". The signature is written in a cursive style with a horizontal line at the end.

Ronald Newton, *LSI*
Engineering Technician II

Cc: Liane Welch, PE, Director, Tillamook County Public Works
Bryan Pohl, Director, Tillamook County Department of Community Development
Amy Hortsman, USFWS Habitat Restoration Program
Haley Blake, Nestucca, Neskowin & Sand Lake Watersheds Council
File

June 1, 2016

Ben Hedstrom, Design and Planning Coordinator
Oregon Parks and Recreation Department
725 Summer Street N.E.
Suite C
Salem, Oregon 97301

Re: Public Comment
Beltz Property Master Plan

Ben:

This letter is sent as a formal response or comment to the current version of the Sitka Sedge State Natural Area Draft Master Plan. This draft master plan, as it is currently written, dooms the Beltz Dike. Chapter 8 advises that OPRD "takes the long view" to restoring fish passage and that an immediate 4' breach is contemplated and that, whenever the dike needs repairs that dike will have to be brought into compliance with full federal regulations. Per this draft master plan, dike breaching is just a matter of time. The draft plan dooms the Beltz dike and does not entertain or list any alternatives to dike breaching such as fish friendly tide gates, rerouting creeks or any others. Breaching the Belt Dike poses a significant risk to the neighboring property owners.

The Beltz Dike, has created a diverse fresh water wetland that, among other things, protects Tierra Del Mar homeowners. The draft plan itself acknowledges that the change from existing conditions would be a 599% increase in the amount of area of mud/water coupled with large corresponding decreases in various freshwater marshes and swamps. The draft plan itself expects a 10" rise in the water and acknowledges that this does not take into account a likely rise in ground water levels.

Obviously, extensive, comprehensive and unbiased hydrologic and geologic studies have not been accomplished. Such studies are needed in order to understand the impacts of dike breaching. History is loaded with examples of disasters related to breached dikes. Radical changes in the flow and volume of water, materials, energy and the composition of existing vegetation will dramatically affect an already fragile environment.

In early 2014, OPRD engaged the Tierra Del Mar community in the planning process and the Tierra Del Mar community expressed their desire that the Beltz property be left as "untouched" as possible. The community was led to believe that low impact development was also OPRD's goal so the community largely supported the use of the property as a low impact natural area. Presentations from OPRD touted the rich biodiversity of the fresh water wetland and desire to respect the cultural impacts that man has on our environment. A year and a half to two years down the road, OPRD springs the idea on the community that that dike must be breached in order to appease the fish passage people. Dike breaching is obviously a giant and negative impact to neighboring property owners. It feels like "bait and switch".

The planning process is dominated by full time government employees who do care about fish but not about people. My wife attended an advisory committee meeting and was distressed by the way influence seemed to be stacked for fish and against people. Where are the voices of

government agencies that must respond to flooded communities? Who is going to compensate home owners for diminished property values? Who is responsible when our septic systems become inoperable? OPRD should be fair and impartial rather than a mouthpiece for fish and wildlife agencies. What changed? Is this entire process funded on these agencies? Does OPRD profit from selling wet land mitigation credits?

For these reasons and because the master plan, once adopted, becomes state administrative law, I make the following recommendations for changes to the plan.

1- Add an affirmative statement to chapters 6 and 8 that "OPRD expressly understands that any dike breaching is likely to adversely impact neighboring property owners and will not be allowed unless and until further comprehensive and unbiased engineering, geologic and hydrologic investigation into impacts of any dike breaching are completed and conclude and clearly state that no adverse impacts to neighboring property will occur."

2- Current language in the plan referring to dike breaching, including removal of the existing tide gate, should be removed. Any such language that remains in the draft plan merely serves to further the inevitability of dike breaching and this is inappropriate given the risk to the neighboring properties and inadequate investigations that have been completed to date.

3- Language should be added to the plan that states that OPRD will review fish passage improvement alternatives, other than dike breaching.

Please make this letter a matter of public record.

Sincerely,
Andy Ewing

buck97229 2016/06/02 at 12:40 pm

The concept for trails and viewing is well done and suits the site very well. The parking lot is not favorable to us personally, but I understand the design decision(s) and thank you for the fence and buffer plantings. If given the task of design, I would probably do the same with the exception of the composting toilet. I will detract from picnicking in the immediate area and affect the neighbors (us). The importance of the Park's amenities pales in comparison to the potential consequences of breaching the Beltz Dike for purposes of fish passage. Such action will eliminate most of the fresh water marsh and with it most of the Sitka Sedge for which the park is now named

The effects of the tidal flows which will result are not fully known, and probably cannot (and certainly will not) be known until (when and if) the Dike is breached. Breaching the Dike puts the community of Tierra Del Mar at potential risk. Not all risks are known at this point, but could include elevated winter ground water levels and erosion. Elevated ground water levels will exacerbate the flooding in Tierra Del Mar. This flooding is due primarily from rain fall. Higher ground water tables will reduce the holding capacity of the sands below the community. Flooding will occur sooner, rise higher and remain high longer. This was the reality of this past winter's rains. The uninhabited beaver dam indicated in your maps is not allowing the surface and ground water levels to reach the lowest levels possible. De-facto removal of this beaver dam will occur following the breach of the Dike. I suggest that it be removed now to provide data to the on-going ground water study. With the monitoring equipment presently installed for the study not only will the lowest ground water elevation be observable but the rate at which the water is discharged will also reveal itself. The delay of 4-6 months to develop another study to more definitively study the hydraulics of the area will probably be long enough to miss the opportunity to develop a base line of the water table in the area of the present study. The base line data is important to fully understanding the ground water flow.

I feel that this issue is of such significance that the entire issue of fish passage should not be a part of the master plan. If this idea is not acceptable then have language in the plan requiring an additional Park's Commission approval before undertaking the work.

Fish passage is desirable. In order to help me make a determination that a breach of the Dike is necessary I think the following should be known:

1. The anticipated number of fish improved passage will provide.
2. The total number of miles of spawning habitat to be made available.
3. Why the fish passage stakeholders feel that the only option is to breach the Dike. Their intransigence on this issue is baffling given that their decision was made in advance of complete study. Fish friendly tide gates have been successfully employed in other locations.
4. How was the proposed re-alignment of Reneke Creek determined to be historic?

It is known that the most recent stream bed (road ditch excluded) is through the 60" culvert near the Beltz farm house, then west and north through a culvert at the east end of the Dike, then into the lake

north and outside of the dike. Returning the stream to this location should reduce the required size of the opening in the Dike. This route could be restored and improved and provide additional spawning bed. We own this property and are willing to cooperate (within reason) with this scheme. Fish once took this route. I have seen them. It was so for decades until the culvert and stream bed were choked by gravel sediment and the creek diverted itself to the shoulder of Sandlake Road in 1999.

5. What are the stream flows? I suggest installing stream measurement equipment to collect data directly from the streams.

In closing I truly hope that this park is successful, well maintained and a jewel on Oregon Coast without negative impact on neighbors and the adjacent community of Tierra Del Mar.

Please include this communication in the record.

Elizabeth O. Meskimen 2016/06/02 at 9:40 am

As a whole the draft plan for Sitka Sedge SNA is well thought out and compiled. I have, however, concerns regarding the tidal flow modifications for the dike. In most references to it with in this plan, there are comments regarding further study needed or that the study done was limited in scope.

On page 16 there is mention of a hydrology assessment. It states the “study will look at the fluvial and tidal hydrology and hydraulics.” On page 17 it continues with a description of a ground water study initiated in March of this year. The study was based on a one month collection period. That is not a study! Had the study started in December, they would have found streets flooded, ditches filled and flowing onto Sand Lake Road, and homes uninhabitable due to septic problems caused by high water. Any study of rain/tidal influences on the coast should be a multi-year study since anyone living on the coast knows every year is different!

Raising the water level will cause problems on Sand Lake Road since areas are frequently flooded by streams/ditches overflowing during heavy rains and high tides in the winter months.

On page 53 the plan states “that Beltz and Reneke Creeks have low habitat value.” It confirms that the findings of small stream size, higher than desirable gradients, lack of pools and large wood are causing the low quality for fish. “These findings need to be verified prior to committing projects to increase fish passages.”

Further statements on that page conclude that impacts from opening a gap in the dike could threaten the rest of the structure and therefore additional geotechnical studies are needed. According to the entire plan, the concept for the Sitka Sedge SNA is to bring people in to appreciate the beauty of the area and its flora and fauna. Yet Figures 6.4a and 6.4b and the accompanying text show any breaching of the dike will alter that beauty, turning significant portions into unattractive mud flats. It will also threaten the dike itself which seems to be the centerpiece of the plan.

Hence I would suggest that any section dealing with the breaching of the dike for fish passages and

presentation be removed and delayed until all studies and investigations are completed.

Jan Spalding 2016/06/01 at 10:04 pm

I am a home owner in Tierra del Mar. I have hiked through the Beltz farm property for years and cherish the beauty and serenity of the "dike walk" to the beach. I am happy that this area has become part of our state park system but have deep concerns about the plans to develop it. I do not support hunting on the property and feel this could be a safety concern for hikers. I am also uninterested in seeing parts of the property being designated "clothing optional". I appreciate the natural beauty of the land and would find it unnerving to be startled by a naked individual in this remote location. I also feel allowing overnight camping could jeporadize the delicate ecosystem.

I am worried that the vault toilet system that has been proposed will be inadequate for the visitors to the park AND the large number of people passing by, such as tourists and bicycle traffic. I think a flushing toilet system should be strongly considered.

I understand there is no turn off lane planned for the parking lot. Traffic travels very fast on that stretch of Sandlake Highway, and I fear it will be a matter of time before there is an accident or fatality at that spot.

The hydrology study (p.17) discusses measurements from March 2016 in Tierra del Mar. How can anyone consider such a limited study to be an accurate representation of the water levels, especially since some of our heaviest rain fall ocured in December 2016? Eloise Ave. was largely underwater. Breaching the dike and potentially causing more flooding will render property in Tierra del Mar unusable. A thorough hydrology study has got to be a part of the comprehensive plan, and vital to decision making regarding changes to the dike!

The state's assistance from the National Coastal Wetlands Conservation Grant should not rush a plan that has not been carefully researched and developed with thoughtful input from the community. I would appreciate my comments to be made part of the public record and not simply be included in a summary.

Kathleen 2016/05/30 at 7:49 pm

From the onset we were told our comments mattered. And the Parks wanted to be good neighbors. I hope my voice is heard.

In the latest "final" draft of the Master Plan, you are not implementing a flushing toilet. Even though it has been brought to your attention that access to existing sewer is readily available. The smell from a vault toilet will detract from a picnic area no matter how often it is emptied. There need not be an extra porta potty on the dike, besides they can not access equipment out on the dike to empty it. They can walk back and use the one in the parking lot. Isn't the idea to keep the estuary "natural"?

I live next door and have studied and witnessed first hand how traffic flows. The stretch of road adjacent to the parking lot is the only clear view and even though it is a double line, cars, trucks and RV's routinely speed up to pass at times in excess of 70 mph. Not having a turn out lane will only result in crashes and fatalities.

Since the inception of Sitka Sedge Park, not once was fish passage mentioned until this last January. Parks planning should have mentioned from the start this "vital" piece of information as it could so drastically affect the home owners of Tierra Del Mar with the evident probability of more flooding. And change the existing ecosystems. There are so many options that have been presented for viable fish passage without breaching the dike. First and foremost would be to utilize existing Reneke Creek to flow in the channel on the north side of the dike. I understand you see the importance of better science on the ground water study over a greater period of time.

I don't think it's appropriate to allow a clothing optional area in Tierra Del Mar. From my experience, it's only the the old fat men that use it to troll and not the young good looking bodies. It would be an assailment to my senses.

Keeping the existing park trails, and putting viewing areas where there already is foot traffic is good. But putting shelters, picnic tables, and platforms on the two large mounds where coyotes have been seen to cavort is not in keeping with natural beauty. I agree with the birders, gravel is not the best medium as it is noisy underfoot.

On the issue of hunting game birds. You've gone to great lengths to bring about conditions to encourage snowed plovers, which is a good thing. So what on earth are you thinking allowing guns where families will be??? Your mission statement is to protect and preserve. Protect all wildlife and people.

I do hope you all take a deep breath, listen to your neighbors, and act on the best interests of the community of Tierra Del Mar, because once you've implemented you plan and all it encompasses there is no going back.

Kathleen Miller

Lorenz Arner - 2016/05/28 at 4:12 pm

WE need to see comments from the Oregon Department/Office of Emergency Response regarding the consequences of breaching the Dike in the plan. Tierra Del Mar has flooded often with usual winter rain fall and the possibility of a Tsunami is strong. Such flooding would be exacerbated with free high water flow through the dike and their services would be required. Consider also that elevated water levels in the swamp East of Sandlake Road would make their directive "head for the high ground" meaningless. Their Tsumami maps for Tierra Del Mar will need revision

Dave 2016/05/27 at 5:18 pm

Looking at the cons on the initial park purchase, most centered around the question of how this park would add to the economic vitality of Sandlake Valley and Tillamook County. I think it has a great potential to do that but there needs to be facilities provided. At Kilchis Point, now a popular destination, they are removing the porta potty and installing a flush toilet at the trailhead. The same is needed at Sitka Sedge. There is also a porta potty near the bird viewing station, a good idea for Sitka Sedge too.

The original parking area at Kilchis Point has already been expanded and now has "overflow" capacity. I think the same is needed here. This park has more visibility than Clay Meyers, and while not Oswald West, the draw I think will be similar to Cape Mears Lighthouse. We are talking a real economic engine here.

Trail surfacing with wood chips is quiet and seems durable when contained and protected with a weed discourging barrier below. Maybe a mixture of chips and gravel. Pure gravel seems harsh, but if a viewing station porta potty is included, I would support it to provide service access.

There is a documented desire for hiking trails. The lengths of the beach access and others make for a good afternoon walk, and look well designed. I do think there could be a very good trail that goes into the forest east of the parking area. With a viewpoint cutout, it would provide a unique public non-motorized experience of the Sandlake Estuary. This might also work as a horse trail area, as the current plan keeps them off the designed trail system.

As Irby White noted, let's create areas for a wide diversity of users. Visitation to Tillamook is one of our economic engines. Why not a clothing optional designated section at the north end of the beach. With the current Snowy Plover rules it would be good to have people who are generally very conscious of the environment be part of the protection plan. It has worked in other parts of the Country.



Nestucca, Neskowin & Sand Lake Watersheds Council

PO Box 86 Pacific City, OR 97135 ❖ (503) 965-2200, fax: 965-2200 ❖ nnwc@nestuccawaters.org

Dear OPRD,

Council Board
Members

Guy Sievert,
President

Mike Wynands, Vice
President

Sherry Vick,
Secretary

Guy Holzworth,
Treasurer

Rob Kliever

Mike Walsh

Melonie Ferguson

Thank you for the opportunity to comment on the Sitka Sedge Natural Area Draft Master Plan. You will find our comments below.

1) Fish passage is discussed in numerous sections of the Master Plan, but the variety of options available to meet state and federal fish passage standards are not included in the plan. The different types of actions that may be taken to satisfy fish passage standards should be included in the plan, so that involved parties can be aware of how each option specifically impacts the whole estuarine ecosystem.

2) On page 53, Beltz and Reneke Creeks are classified as having low habitat value. This section should acknowledge that the dike is negatively impacting the habitat's quality. This section should also include the restoration potential of these creeks. Beltz and Reneke are high priority restoration sites for the NNSL Watersheds Council. If natural hydrology is restored and the downstream fish barrier is opened up, the creeks aquatic habitat will naturally improve, allowing the Council to work with partners to implement system-wide comprehensive restoration projects.

3) This draft plan does not include information about the importance of estuarine habitat for fish. Estuaries provide important habitat for threatened coho and other fish, which should thoroughly be discussed in the plan. The tidegate and dike affect the quality of this estuarine habitat. The current tidegate influenced habitat quality should be assessed and included in the plan as well as the habitat potential under the various fish passage option scenarios.

4) The current draft plan suggests that opening up the dike only benefits fish species. However, restoring natural hydrology to the estuary has many other benefits including improved water quality. The plan should include a broader overview of how current hydrology, and restored hydrology would affect the entire estuarine ecosystem. This draft suggests that fish passage is the only benefit to opening up the dike, but fish passage is only one of many benefits.

Haley Blake

Nestucca, Neskowin and Sand Lake Watersheds Council Coordinator

Sitka Sedge State Natural Area
2016 DRAFT Master Plan
Comments
6/2/2016

As a third generation, part-time resident of Tierra Del Mar from the late 1940s to 2007 (when my family's property was sold) and as a member of the master plan advisory committee, I have a range of issues concerning Sitka Sedge State Natural Area (SNA), having been involved in working to protect this area from various types of development in small ways since I was in grade school (nuclear power plant, Hwy 101, and more recently, golf courses). My main focus is with the natural world, with protecting and restoring healthy ecosystems of the coastal forest, deflation plain plant succession, dune succession woodlands, the unique communities of inter-related native plant and animal species of those habitats and of the streams and estuary of Sand Lake itself, as well as of the fore dunes, beach vegetation and especially the fishes and birds to be found associated with all these various areas. In addition, I relate with those individuals and families now fortunate enough to live as neighbors with this newest state park SNA, whether year-round or part-time.

Public Involvement:

I was heartened to read in the draft master plan presented at the most recent advisory committee meeting that it is the intention of the Oregon Parks and Recreation Department (OPRD) to maintain a relationship with the community of Tierra Del Mar and other neighbors. A relationship which I understand will involve seeking and listening to ideas, concerns, and answering questions, as well as providing information to in a timely manner. I believe it would be an excellent idea to have those who have been (or who are) involved in gathering and assessing data about the natural area and the anticipated effects from proposed/ planned SNA actions meet with interested individuals, community members and others, to discuss this information more thoroughly. Being heard and having one's concerns and ideas heard, considered, and where appropriate, implemented, seems to me to be key to the successful public participation in this planning process.

SNA Native Species, Restoration and Protection of Natural Features:

Since I was fortunate enough in the mid 1980s to encounter an adult snowy plover, as well as observing the nest with several eggs south of Sand Lake inlet up the beach

from the high tide line, and later see several chicks scattering among the fore dune/beach vegetation and drift wood, I have some concerns about assuring the safe nesting, rearing, and fledging of these Threatened & Endangered listed (yes?) birds. While tiny in size compared to the formerly listed Bald Eagles found around the estuary and on the sand spit beach, their importance in the overall web of life of the ocean/beach/estuary/dune feature of the Sitka Sedge SNA is, I believe, neither known nor understood at this time. As an amateur naturalist and artist working in clay who has many animals appear from that medium, I find them fascinating and enchanting, their value to inspire and inform, beyond any dollar amount.

I am quite willing to forego walking in the area where they might be found and have no plans to bike or fly kites in this part of the sand spit. Sitka Sedge, as a designated State Natural Area, must, from my perspective, take all due precautions to protect this small bird, and provide the habitat it needs. The three paragraphs headed "Western Snowy Plover Habitat Conservation" might be expanded in the final master plan to provide more information about this native species. With perhaps also, more discussion of what the term "Recreation Management Area" means and what would be involved with designating the northern portion of Sand Lake spit from the mouth southward as primarily western snowy plover habitat.

Moving inland from the beach/fore dune region to the evolving "looming large" tier of dunes, I would like to emphasize the ongoing changes in plant cover, dune height, and animals present in light of the former (mid-50s to mid-80s?) condition of open, sparsely vegetated dunes with traces of the WWII Coast Guard "road," communication poles with glass insulators, friends and family members hiked over when not walking the beach to reach the inlet. This could be what seemed a near-desert experience--hot, dry, with burning sand that slid away underfoot. The cool, deeply shaded beach pine/sitka spruce woods with mossy banks under berry-covered evergreen huckleberry, salal, kinnikinnick, and ferns constitutes for me a living education in the element of on-going change in this landscape. Just as the changes in the large deflation plain lakes between the dunes and the woods through which Sandlake Road runs reflect how ditching at Tierra Del Mar (S to N, W to E) and the planting of beach pine between Pollock and Roma in the early 50s (?) by Oscar Spleed who ran the water system and did other land work for Mrs. Pollock before most of the dwellings on those avenues were built. For example, there were two seasonal and three year-round residences on Pier when my family's cabin was purchased and my great aunt's house was built. I have since met a young Tillamook woman whose family annually gathered huckleberries and other berries there at the

north end of what is now Tierra Del Mar, prior to Euro-American incursion. So what do I mean when I refer to restoration and protection of natural features?

For the sand spit area north of Tierra Del Mar, what I mean is the removal of non-native species, such as the Scotch broom (*Cytisus scoparius*) which was planted along with the European beach grass to stabilize the shifting dunes, also tansy ragwort (*Senecio jacobaea*)...not to be confused with seaside/beach/or western tansy (*Tanacetum camphoratum*), a pungently-scented golden button flowered native. I mean not disturbing the inter-related fungi/moss/native orchids, which though described in field guides as found from Alaska to southern Oregon or southern California and inland in similar habitats, are facing the threats of human development wherever they might once have been found. Hooded Ladies' Tresses (*Spiranthes romanzoffiana*), Dense-flowered Rein Orchid (*Habenaria michaelii*), Rattlesnake-plantain (*Goodyera oblongifolia*) among them, and possibly other orchids. Also, Indian Paintbrush (*Castilleja* spp.) and Indian Pipe (*Monotropa uniflora*), which like the orchids, grow in interwoven relationships with the plants around them. These native plants may catch the eye with the bright orange-red and green of the *Castilleja* species, and shimmering ghostly silver-white of the down-turned flowers of *M. uniflora*. Widening existing trails and establishing new trails will need to be very carefully done to avoid taking out these natives, especially the orchids when only in leaf or dried brown and in-seed.

I have not had the opportunity to read the support documents, having concentrated on the draft master plan. Hopefully, many of the native plants I appreciate will be mentioned and listed for being managed to continue in the communities they are now associated with.

On to the aquatic ecosystems. I concur with this draft's plans to reroute Reneke Creek, improve Beltz Creek, and plant native riparian trees and shrubs. I would add, that I have found on the properties I care for that also planting flowering plants in among the woody improves the health, growth, and productivity of all the plants. For example, where it would be usual to find evergreen huckleberry (*Vaccinium ovatum*) among pine and spruce, hemlock and fir, planting the little beach lily, *Maianthemum dilatatum*, and *Smilacina* spp. (various Solomon's Seals) resulted in blooms, fruit, and growth of my struggling huckleberry among pines.

An aside here is that having studied with an ethnobotanist working to re-establish traditional foods harvesting among West Coast tribes, I learned that not just the

fruit, but also the twigs and leaves of evergreen huckleberry (and other of the heath family) are helpful in clearing up colds and flu. I speculate that these plants, along with other native medicinal plants, would be prudent to re-establish in the replantings that are listed as actions to take when the currently grassy upland fields east of Sandlake Road are returned to natural areas. The E. coli bacteria found in much domestic livestock manure and urine has been found to persist, over-wintering in stream bottoms and elsewhere. *V. ovatum* might be effective in reducing this bacteria. The opportunities for ground-breaking health studies of native plants associated with Sitka Sedge SNA excites me. As you can see, I find cattle grazing/domestic agriculture in a SNA unnatural and expect that the uplands fields highest and best use for the health of the estuary and its dependent, associated species is to restore these fields to their earlier rich communities of native wood and herbaceous plants so that a rich diversity of native animals (mammals, reptiles, amphibians, insects, birds.....might be re-established. A priority closely connected with the health of the streams flowing down from the U.S. Forest Service lands where they originate. Note that one draft statement has the streams flowing from their road crossing to the forest lands.

Healthy estuary functioning and condition is a high priority with me. I support efforts to maintain where health exists and restore where it does not. All with an eye to the need to not worsen the ecological condition of the community of Tierra Del Mar nor that of the neighbors adjacent to the north.

Many small typos or statements I would like to see expanded upon or corrected, exist in this draft. I am hopeful they were caught in the newest draft out for review. All in all, an impressive document that needs fine-tuning.

Thank you for this opportunity to comment.

With Respect,

Kathleen Simpson Myron
PO Box 675
Canby, OR 97013

503.266.1263 myrons@canby.com

Note: Not proofed

Mr. Hedstrom:

Please accept these brief comments into the record relating to the draft master plan for the Sitka Sedge State Natural Area (formerly known as the Beltz Farm).

As President of the over 275-member Tillamook Chapter of the Oregon Hunters Association, an association with about 10,000 members statewide, our membership is concerned about the absence of any mention within the draft master plan of any opportunity to hunt during authorized seasons, most specifically for migratory birds and waterfowl, within the proposed Sitka Sedge State Natural Area.

The Oregon Hunters Association is strongly committed to providing abundant huntable wildlife resources in Oregon for present and future generations, the enhancement of wildlife habitat, and the protection of hunters rights.

Hunting and hunters have always been a part of the culture and cultural heritage of Oregon and Tillamook county. Hunters are the original conservationists where we have historically supported with our voices and with our dollars the creation of wildlife management areas and parks within Oregon and nationally, and where we have historically supported the conservation of wildlife, the establishment of seasons and bag limits, and the imposition of taxes on firearms and ammunition and waterfowl stamps to fund land acquisitions and habitat improvement projects for wildlife.

Oregon hunters are a useful tool for wildlife managers where wildlife create conflicts with other land users. For example, Canada geese populations can severely impact domestic and agricultural uses where those geese concentrate. Hunters are a useful tool for keeping those impacts within acceptable levels while utilizing that renewable resource for food and recreation.

From my own memory, there are (or at least have been) state parks wherein access and opportunity for hunters and hunting coexist with other park uses. Reasonable regulations can minimize or eliminate conflicts among various users while gaining important allies in land management and wildlife conservation “who put their money where their mouth is” to fund wildlife habitat improvement projects.

I strongly urge the Oregon Department of Parks and Recreation to keep the area locally known as the Beltz Farm, a.k.a.

the

Sitka Sedge State Natural Area, open and accessible to all recreationalists, but more specifically here to properly licensed, migratory bird and waterfowl hunters during authorized seasons.

Sincerely,
John R. Putman,
Tillamook Chapter
President,
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United States Department of the Interior



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Reply To: 6938.1501
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TS Number: 16-499
Doc Type: docx

Ben Hedstrom, Design and Planning Coordinator
Integrated Park Services Section
Oregon Parks and Recreation Department
725 Summer St. NE Suite C
Salem, OR 97301-1266

JUN 02 2016

Dear Mr. Hedstrom,

Thank you for the opportunity to provide feedback on the Sitka Sedge State Natural Area Draft Master Plan. After reviewing the draft plan, we have several concerns regarding the issues we raised in our January 29, 2016 letter (enclosed). We provided similar feedback during your advisory meeting on May 5, 2016 at the Kiawanda Community Center in Pacific City as well. Our understanding is that the draft master plan will be revised to better incorporate comments that address natural resource planning, and will be subsequently made available for another round of review.

In our letter of January 29, 2016, we commented on four main aspects of the planning process: (1) restoration of natural estuarine hydrology, (2) impacts to sensitive avian and dune communities, (3) proposed parking and picnic areas, and (4) restoration of current pasture areas. These comments provided specific recommendations for your consideration in planning how to meet your proposed goals for the State Natural Area, such as maintaining and improving the area's natural resources.

In order to facilitate revision of the draft master plan, we are providing our main concerns about potential impacts to sensitive natural resources that may result from implementation of the master plan as currently drafted, as well as suggestions on ways the master plan could better meet your goals of balancing public recreation, wildlife viewing, and natural resource enhancement at this incredible and unique coastal property.

Snowy Plover

The Sand Lake south spit is a historical breeding site within the federally threatened Pacific coast population of the western snowy plover (*Charadrius nivosus nivosus*, referred to hereafter as, "snowy plover") range. The site also contains the physical and biological features (roost sites, nesting grounds, seasonal wetlands, water quality, tide, soil type) that are essential to the conservation of the species. We originally proposed 200 acres for designation of critical habitat

at the site, but reduced the amount of critical habitat in this unit to just 5 acres under section 4(b)(2) of the Endangered Species Act in the final rule (77 FR 36727). We excluded 195 of the proposed 200 acres of critical habitat from this unit based on our assessment of the benefits that would be achieved through implementation of your Habitat Conservation Plan (HCP), which includes limiting the extent of human use and recreational activities during the snowy plover breeding season, conducting public interpretation and education activities for beach visitors, providing daily compliance and monitoring personnel, and providing enforcement staff to deter and respond to recreation violations (OPRD 2010). South Sand Lake Spit was identified as a Recreational Management Area in the HCP because it was under private ownership at the time the HCP was completed (OPRD 2010). Now that OPRD owns and manages the site, it should be referred to as a Snowy Plover Management Area in the Sitka Sedge State Natural Area master plan and other planning and outreach documentation.

Snowy plovers have been reported using Sand Lake south spit numerous times over the last 5 years: they have been continuously observed at the site since August of 2015, breeding activity was documented on March 31, 2016, and an active nest was confirmed at this site on April 20, 2016 (the first nest in over 35 years at this location). The site has become occupied since our January letter, and several management actions outlined in the HCP require implementation on an annual basis, and a site management plan should be developed in coordination with USFWS and the Oregon Department of Fish and Wildlife (ODFW) in order to maintain compliance with the HCP implementing agreement and Incidental Take Permit. Although specific objectives, tasks and details that would be appropriate to include in a site management plan do not need to be incorporated into the Sitka Sedge State Natural Area Master Plan, a general summary of the prescribed management actions (see table 5-4 of the HCP, OPRD 2010), and a timeframe for completion of a site management plan should be included in the master plan.

Human disturbance, especially recreation in and near snowy plover habitat, has been an ongoing factor affecting snowy plover populations in Oregon and across the range. At South Beach in Newport, for example, the number of breeding snowy plovers declined from more than 25 in 1969 to zero in 1981 (ODFW 1994). During this time South Beach State Park was opened and that habitat became more accessible to people (Hoffman 1972 *in* ODFW 1994). Pedestrians can cause both direct and indirect mortality and harassment of snowy plovers.

According to the Shelby and Tokarczyk (2002) recreational use study prepared for OPRD, Tillamook and Sandlake beach segments have similar levels of public use as other sites (e.g., Bandon State Natural Area) where OPRD manages and invests significant agency resources to monitor, conserve, and protect snowy plovers. The draft master plan notes that management of Sitka Sedge State Natural Area will be difficult due to the remoteness of the site and that staffing will be limited at this park. Development of recreational opportunities at the park (i.e., parking lot size, proposed trail development and beach access points related to the North and South Trail Loops, and motorized vehicle use during the breeding and winter periods), will likely result in difficulties in maintaining compliance with State Ocean Shore rules and diminish the effect of efforts that are invested to protect and conserve snowy plovers at this site.

Alternative designs to the master plan are recommended in order to increase the likelihood of public compliance with State Ocean Shore rules and avoid or minimize negative impacts to snowy plovers. These recommendations include: (1) closing trails and beach access points that connect existing and proposed trails to areas that contain or are adjacent to suitable snowy plover breeding habitat (i.e., the proposed trail segment that connects the North Loop Trail near the tip

of the South Sand Lake Spit and the proposed trail segment that connects the southern end of the North Loop Trail to the beach), (2) prohibiting motorized vehicle use year-round on the beach, and (3) reducing anticipated visitor capacity to levels that can be managed under current staffing limitations or increase staffing levels to accommodate visitor capacity estimates and anticipated levels of public use.

Hydrology and Estuarine Habitats

Section 3 of the draft Sitka Sedge State Natural Area Master Plan covers resource assessments. We would recommend including information on the water quality data collected within the diked portion of the site. Data collected by Department of Environmental Quality and Tillamook Estuaries Partnership in summer 2015 show that dissolved oxygen inside the diked area frequently reaches levels well below the state standards for estuaries which would impact the potential for threatened salmon or other fish species to persist in this wetland. Dissolved oxygen levels detected by a probe installed outside of the dike also at times reached levels below the standard, but were likely significantly influenced by the outflow of water from behind the dike and not representative of outside conditions. The water quality data collected on the site also clearly show that the salinity levels inside the dike are quite high; we would suggest that throughout the draft plan the references to 'freshwater' marsh be updated to reflect this information.

We would also recommend including topographic survey and tidal and fluvial hydrologic modeling data in this plan, including a description of the data collection methods and an interpretation of the results. In the May 5th advisory meeting, it was clear that local landowners were not aware of this information. One of the key tenants of U.S. Fish and Wildlife Service (USFWS) habitat restoration programs is that restoration projects should cause no harm to human communities. We would suggest additional efforts be made to present the topographical and hydrologic methods, data, and results to the community. This will help develop a clear understanding of the data available and a shared discussion on the sufficiency and rigor of the methods.

The resource assessment includes a paragraph on fisheries resources of two tributaries to Sand Lake Estuary. We would recommend that there is a more robust body of information and literature on potential fish use of the estuary and those tributaries that this plan could cover; in particular in the context of a functional estuary capable providing important rearing habitats.

Section 3 of the draft plan discusses development of 'fish passage alternatives' on page 17 and Section 6 discusses options for dike re-configuration on pages 52-53. We would suggest that the language in these two sections could be improved to better characterize efforts, participation, and contributions of various entities, including the USFWS. As participants in the restoration modeling discussions, it is our understanding that at this point no alternatives have been defined for dike breach or fish passage. However, two scenarios were modeled by the consultant as an initial reference to provide information on: 1) whether increasing tidal interchange has potential to impact roads and human communities, 2) the depth or duration of flooding behind dike for OPRD to use in a vegetation model to determine likely changes to plant communities. The two scenarios were the existing situation (i.e., four foot square box without tide gate flap) and a likely state fish passage minimum (18 feet). We envisioned that additional modeling would be undertaken in relationship to: a) State and Federal fish passage requirements, b) velocity and scour that might impact structural stability of any crossings required for access, and c) goals associated with restoration and reconnection of key tidal processes, including sediment transport

and water quality. It is our understanding that additional modeling and analysis were not undertaken due to OPRD concerns about changes to plant communities that might result from removing the tide gate lids.

Generally, while the document focuses largely on fish passage as the primary reason to consider modification to or opening of the dike, fish passage is only one benefit that could be achieved via restoration of natural estuarine hydrology. Other benefits were outlined in our previous letter and include: tidal interchange; water quality improvements; sediment transport; natural succession of tidal wetland communities; movement of other aquatic life such as crabs and shrimp; nursery habitats for fish and other aquatic species; improved outflow and potential for reduced inundation that could improve drainage and reduce flooding for surrounding human communities; and establishment of foraging and resting habitats for shorebirds and waterfowl.

We would recommend reconnecting tidal hydrology with a sufficiently large opening in the dike to reestablish the natural tidal hydrology and processes in a manner that addresses the inadequacy of the existing, failing tidegate structure, but avoids negatively impacting other public infrastructure or human communities. Such restoration will ensure natural processes are restored which will result in some change to plant communities inside the dike, but will enable a natural restoration trajectory which will result in re-establishment of a native, site-appropriate wetland community over time. Sizing the opening to effectively accommodate tidal interchange will limit structural and biological impacts of scour due to elevated velocities and will ensure that all life history forms of native aquatic species have ingress/egress and improved water quality conditions for rearing; creating a more resilient natural resource condition in the estuary and sustainable infrastructure. Improvements to recreational features that focus on the dike should be determined only after a thorough analysis has determined the size and design considerations of a stable, low velocity opening.

The USFWS believes that these recommendations are consistent with and reflect the values that were developed through the public input process and presented at the planning meeting. If you have any questions related to snowy plover please contact Daniel Elbert or Laura Todd at (541) 867-4558 or daniel_elbert@fws.gov or laura_todd@fws.gov. For questions related to estuarine restoration, please contact Amy Horstman at (360) 604-2512 or amy_horstman@fws.gov.

Sincerely,


PH Paul Henson
State Supervisor

Enclosure

USFWS Comment Letter, January 29, 2016

cc (without enclosure):

Martin Nugent, ODFW, Threatened, Endangered and Sensitive Species Coordinator
Herman Biederbeck, ODFW, North Coast District Wildlife Biologist
Sarah Bielski, USFWS, WSFR
Kelly Moroney, USFWS, Oregon Coast NWRC
Laura Todd, USFWS, Newport Field Office

References

Oregon Department of Fish and Wildlife. 1994. Oregon Conservation Program for the Western Snowy Plover - Final Draft. Portland, Oregon. 56 pp.

Oregon Parks and Recreation Department. 2010. Habitat Conservation Plan for the Western Snowy Plover. August. (ICF 06537.06.) Portland, OR. 370 pp.

Shelby, B., and J. Tokarczyk. 2002. Oregon Shore Recreational Use Study. Unpublished report prepared for Oregon Parks and Recreation Department. Oregon State University, Corvallis, OR. 146 pp.

U.S. Fish and Wildlife Service. 2012. Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the Pacific Coast Population of the Western Snowy Plover; Final Rule. Federal Register 77 FR 36727. June 19, 2012.

From: [OHA-Putman](#)
To: [HEDSTROM Ben * OPRD](#)
Subject: Comments re: Draft Master Plan Beltz Farm, a.k.a. Sitka Sedge State Natural Area.
Date: Thursday, June 02, 2016 6:01:23 PM

Mr. Hedstrom:

Please accept these brief comments into the record relating to the draft master plan for the Sitka Sedge State Natural Area (formerly known as the Beltz Farm).

As President of the over 275-member Tillamook Chapter of the Oregon Hunters Association, an association with about 10,000 members statewide, our membership is concerned about the absence of any mention within the draft master plan of any opportunity to hunt during authorized seasons, most specifically for migratory birds and waterfowl, within the proposed Sitka Sedge State Natural Area. The Oregon Hunters Association is strongly committed to providing abundant huntable wildlife resources in Oregon for present and future generations, the enhancement of wildlife habitat, and the protection of hunters rights.

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From my own memory, there are (or at least have been) state parks wherein access and opportunity for hunters and hunting coexist with other park uses. Reasonable regulations can minimize or eliminate conflicts among various users while gaining important allies in land management and wildlife conservation “who put their money where their mouth is” to fund wildlife habitat improvement projects.

I strongly urge the Oregon Department of Parks and Recreation to keep the area locally known as the Beltz Farm, a.k.a. the Sitka Sedge State Natural Area, open and accessible to all recreationalists, but more specifically here to properly licensed, migratory bird and waterfowl hunters during authorized seasons.

Sincerely,
John R. Putman,
Tillamook Chapter President,
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From: sandygunder@comcast.net
To: [HEDSTROM Ben * OPRD](#)
Subject: Re: Beltz Property Master Plan
Date: Wednesday, June 01, 2016 8:00:18 PM

Dear Ben-

This concerns the potential breaching of the dike in the new Park on the Beltz property. The Master Plan seems to be proceeding along without the necessary concern for the potential risks to Tierra Del Mar. We have owned property in Tierra del Mar for decades. With rising water levels (over a foot deep on Eloise this past winter) and global warming sure to continue, why would we put people and their property at risk unnecessarily? There is no reason to make this worse.

We are worried that your plan will greatly contribute to a higher water level and ultimately result in flooding of our properties. We would like the proposed breach idea to be excluded from your plan, or at a minimum, delayed until further study is done or until an alternate plan is developed to alleviate the risks. Most of the citizens of Tierra Del Mar lobbied for the Park vs. the potential golf course on that property. It would be an evil irony to go back on that support now.

Review of the Sitka Sedge Natural Area Master Plan With Proposed Alternatives

Sitka Sedge Natural Area, the newest Oregon state park was purchased by the Oregon Parks and Recreation Department (OPRD) from a California developer through a grant from the Department of Oregon Fish and Wildlife with State lottery funds. The park preserves the south end of Sand Lake, one of the last pristine coastal estuaries on the west coast and contains a unique fresh water marsh. The park acquisition permanently protects 357 acres of coastal wetlands habitat within the Sand Lake estuary in Tillamook County. The Beltz Farm parcels include coastal estuary and freshwater wetlands, coastal dune habitat, ocean shore and forest and upland scrub habitats. Conservation of Beltz Farm has long been a priority of the local community, conservationists and state agencies due to the diversity of coastal habitats, the pristine condition of the estuary and its importance to listed and sensitive species including more than 100 bird species, amphibians and fish. Beltz Farm has been under significant development pressure in recent decades, with proposals for resorts, golf courses and condominiums all pursued. The final draft of the Sitka Sedge Natural Master Plan has just been released for review and public comment.

The Tierra Del Mar Community is pleased overall with the Master Plan for the new Sitka Sedge Natural Area. The residents of the Tierra Del Mar and Sand Lake community through the advocacy of local resident Lynda Steiner along with the support of the Tierra Del Mar Community Association have fought the onslaught of developers for over 30 years to secure this unique environment for the citizens of the State of Oregon. The village of Tierra Del Mar sits adjacent to the southern border of this new state park. Our histories have been intertwined ever since Marie Pollock established the community of Tierra Del Mar over 80 years ago. Together with the Sears family and the Beltz farm families, the residents of Sand Lake and Tierra Del Mar have been the good stewards of this unique and fragile habitat for many generations.

However, we now have a major concern with the State Parks and Recreation Department current plan to remove the existing tide gate and breach the Beltz dike by 18 feet.

Overall, the Sitka Sedge Natural Area consists of 357 acres of habitat, including 37 acres north of Beltz dike in the Sand Lake Estuary. 50 of the 357 park acres are south of dike. Due to the partial failure of the existing top hinge tide gate, 10 of those acres are already mixed intertidal fresh and salt water marsh. The remaining 40 acres are fresh water streams, ditches and the fresh water marsh and meadow. The entire Sand Lake estuary covers over 1250 acres. If by breaching the dike, the remaining 40 acres of fresh water marsh within the Sitka Sedge Natural Area are flooded by uncontrolled tidal flows, they will only contribute an additional 3.2% of tide lands to the Sand Lake Estuary.

However, the impact on the fresh water marsh and meadows will be dramatic. It will basically eliminate part of the unique environment that the park is being developed to protect. We will lose critical nesting and foraging habitat for migratory song birds and waterfowl, including Virginia Rail, Northern Pintail, Widgeon, Wood ducks, Canadian Snow geese, and mergansers of several species that use the fresh water marsh as a "stop over sanctuary" twice a year. Many waterfowl such as herons and other waders, and a number of bird species of high conservation concern are full time residents of the marsh. Insects including rare butterflies, amphibians, otters, beavers, and a host of other wildlife feed and live in and along the fresh water marsh. Many use the marsh as a safe passage to and from the shore pine forest to the west. The impact of breaching the Beltz dike on the fresh water marsh and meadow flora will also be severe including the possible loss of the Sitka Sedge plant that the park is named for. The loss of this plant would just be a bitter irony.

The argument has been made that the fresh water marsh is not "natural" historically. However, none of the park is historically "natural". The spit was planted with European beach grass decades ago eliminating the historic sand dunes and creating a shore pine forest north of Tierra Del Mar that didn't even

exist 40 years ago. The original meadows on the east side of Sand Lake road and old growth forest on the hillside are now grass pastures and “managed” timber and alder having been logged multiple times. So the fresh water marsh, which is over 80 years old is really one of the most pristine and natural of the three environments within the park. Of course, the marshes and wetlands north of the new park are natural but especially with recent acquisitions around Sand Lake and improvements to the Whalen Island/Clay Myers Park, we have a very large nearly pristine estuarine environment already under protection that will be needing integrated management.

We all agree that fish passage into watersheds is necessary. Three minor creeks flow into the Sitka Sedge Natural Area. They form the smallest drainages in the overall Sand Lake watershed system. Reneke Creek is the largest of the three and has had significant salmon runs in the past. Beltz Creek and the unnamed creek that flow from the southeast are very short low flow streams with insufficient upstream habitat for spawning salmon. All three creeks however, can provide protective feeding grounds for juvenile fish near their entry into the Sand Lake tidal estuary.

Sand Creek, which enters the salt water estuary from the north east, is the largest drainage within the Sand Lake watershed. Sand Creek is also the most important system in the watershed with miles of tributaries. It offers the most substantial habitat for adult and juvenile salmon in the Sand Lake watershed. The Sand Creek drainage needs resources to improve salmon habitat by replacing inadequate road culverts and in making streambed improvements. The focus of habitat protection and restoration should be centered on the area with the most potential, the Sand Creek watershed.

Secondly, the Beltz dike was built to deal with daily tidal flooding on the land south of the dike. According to historic material collected by Diana Sears, it was also used to allow safe passage for people across the tide flats to reach the ocean and a small field located along the dune area on the west side of the dike. The new park plan proposes to use the dike for the same purpose. The "Natural Resources of Sand Lake Estuary" report written by Rebecca Kreag and published

by the Oregon Department of Fish and Wildlife in 1979 states that, "The dike apparently was constructed for flood control rather than agricultural purposes, and the diked area has remained essentially undisturbed since the original alteration." It was not built to create additional pasture land for the Beltz Farm. The dairy farm always operated to the greatest extent, in the pastures to the east of the fresh water marsh, and what is now Sand Lake Road.

The dike was constructed by Judge Beltz at the same time that the community of Tierra Del Mar was being developed by Mrs. Pollock. By agreement between Judge Beltz and Mrs. Pollock, a series of drainage ditches were dug throughout the village and across the then forming fresh water marsh. The ditches were designed to direct fresh water flow toward the dike tide gates allowing for controlled high water drainage from the south and east. At the same time, the dike prevented daily high tides and winter tidal surges that were known then to flood the north end of Tierra Del Mar. When originally constructed, the dike had two tide gates to allow for the fresh water flow out into the tidal estuary at low tide and to be able to control high tide levels at the south end of the salt water estuary at that time bordering the Beltz farm and the new village of Tierra Del Mar.

Current conservation trends favor breaching dikes and levees and removing existing tide gates. The recent removal of tide gates and breaching the dikes along the Kilchis River north of town of Tillamook have caused major flooding and ground water drainage problems for the residents and businesses working and living in that area. Current National Oceanic and Atmospheric Administration (NOAA) data from the Garibaldi station recorded the king tides of March 10th through the 13th, 2016 exceeding NOAA predictions by over 2 feet. The NOAA Astoria station data exceeded historic predictions by 2.7 feet. Those are for both high and low tide levels. Given the forecast due to climate change, for higher sea levels and, of course higher tides, losing the protection of the dike will impact the historic village of Tierra Del Mar. We understand that the height of the dike will not protect the community from tides topping 14 feet and more. However, allowing uncontrolled tidal flow into the fresh water wetland right up to the north end of Tierra Del Mar, as shown in the OPRD park master plan, will certainly cause flooding, increase the water table level and exacerbate ground water drainage issues throughout the village. Historic data

referring to Mrs. Pollock's drainage and flooding problems encountered in initially developing the north end of Tierra Del Mar, and observations by members of the Beachy Family living on the Beltz Farm in the 1960's and 70' support this conclusion. At that time, when the tide gate failed during a winter storm, tidal surges flooded the properties along Roma and Pollock streets on the west side of Sand Lake Road.

The 225 homes in Tierra Del Mar depend on in-ground septic and leach field drainage systems. The future construction of offsite sewage treatment facilities is not an option. Even if the elevation in the community averages 14 feet above sea level, septic tanks are buried below ground between 5 and 6 feet. Major complications in the effective operation of those individual sewage systems will occur with increases in ground water flooding and a rise in water table levels. An inability to flush toilets during the high water and high tide occurrences will be more than just inconvenient for Tierra Del Mar residents. It will create unsanitary conditions and a hazard to human health.

The Sand Lake and Tierra Del Mar community was first made fully aware of the OPRD plan to breach the Beltz dike in late January 2016. Once the community understood that the only option really being offered by OPRD for consideration was a full 18 foot breach of the dike, we formed a steering committee of actively involved residents with professional backgrounds and environmental interests to study the impact to the community and explore additional options. We believe that many of the OPRD staff would like to see some way to preserve a major portion of the fresh water marsh and yet still promote effective fish passage through the park. We are led to believe that the pressure to allow major uncontrolled tidal flooding by a full breach of the Beltz dike comes from a group referred to as the "Fish Passage Stakeholders". The individuals in this group are unnamed specifically, but the group is made up of representatives from the National Oceanic and Atmospheric Administration, Nestucca, Neskowin & Sand Lake Watersheds Council, Oregon Department of Environmental Quality, Oregon Department of Fish and Wildlife, Oregon Department of Parks and Recreation, Oregon Department of State Lands, Oregon Watershed Enhancement Board, Tillamook County, Tillamook Estuaries Partnership, US Fish and Wildlife

Service, US Forest Service among others, many of which are also on the advisory committee. None of whom represent the residents of Tierra Del Mar or own property in the community. This is the group of stakeholders that was set up by OPRD as required by the Oregon Department of Fish and Wildlife under terms of the grant agreement, to explore the merits of fish passage alternatives. Since most of the funding to purchase the park came from lottery money through the Oregon Department of Fish and Wildlife, we can assume that the ODF&W is also the principal agent requiring a full breach of the dike. We also understand that the availability of funds needed to make repairs to Sand Lake road, and to culverts, bridges and stream beds throughout the watershed is contingent on a full breach of the Beltz dike.

As representatives of the Tierra Del Mar community, we have chosen to take a proactive approach in promoting fish passage into the Sitka Sedge Natural Area streams, while minimizing the impact on the overall natural wetland ecology, by offering a sound alternative to breaching the Beltz dike. We want to work cooperatively with all the members of the Fish Passage Stakeholders group. We are stakeholders too, and, as good partners and neighbors, we prefer to take a "mitigation verses litigation" approach to avoid future problems that may arise with the of breaching the Beltz dike.

After extensive research and the study of reports published by many of the "Fish Passage Stakeholders" listed above, we believe that a combination of two actions will accommodate successful fish passage into the Reneke and Beltz Creeks watershed while preserving most of the fresh water marsh and protecting the Tierra Del Mar community.

First of all, Reneke Creek needs to be restored to its original stream bed. The creek is already slated to be rerouted away from the road and through the park. Historically the creek ran through a culvert under Sand Lake road at a location north of the current small culvert it passes through now. Until relatively recently, Reneke Creek flowed through the original large culvert located by the Beltz Farm house used by caretaker/farmers for the Beltz family. After the creek passed

under Sand Lake Road, it flowed west for a couple of hundred feet before it turned north paralleling the fresh water marsh area but never entering the marsh itself during normal flow. The creek then passed under an existing culvert at the east end of the dike turning west, entering directly into the Sand Lake tidal estuary, bypassing the dike and the fresh water marsh entirely. When the large culvert under Sand Lake Road silted up, the creek sought a new route along the Sand Lake east barrow pit and entered a small culvert originally designed to handle a minor flow from a small spring and marsh seep located south and east of the road. All the recent damage to, and the flooding of Sand Lake Road, is due to the current misdirected flow of Reneke Creek. The new park plans intend to reroute the creek to the south following a new stream bed meandering across the field east of Sand Lake Road. It will then pass beneath a new bridge that will replace the small, inadequate culvert that currently crosses under the road and runs directly into the fresh water marsh. Until recently, Reneke Creek did not follow any passage south of the Beltz farm house and did not enter into the fresh water wetland. This can be confirmed by studying older USGS maps and reviewing information provided by the former Beltz Farm residents, Nancy Beltz Edwards and Bill Beachy, who also is a Tillamook County Road Department employee. Mr. Beachy has been advocating the replacement of the original large culvert to the north and the restoration of Reneke Creek to its historic stream bed to flow directly into Sand Lake for a number of years. The original stream bed west of Sand Lake Road can still be clearly observed. The current owners of the property directly north and adjacent to the new park are willing to allow Reneke Creek to be restored to its original historic stream bed again bypassing Beltz dike and the fresh water marsh to flow directly into Sand Lake.

As mentioned earlier, Reneke Creek has the most suitable drainage within the natural area boundary, for salmon habitat. It is the largest stream in the Reneke/Beltz watershed, representing the most significant water flow through the fresh water wetland and the dike into the Sand Lake tidal estuary.

Historically we know that Reneke Creek supported substantial salmon runs when it flowed unobstructed directly into Sand Lake. The most effective way to

restore salmon into the Reneke Creek watershed is to return the creek to its original stream bed and outlet. If Reneke Creek doesn't continue to flow through the fresh water marsh south of the dike and then on into Sand Lake through the dike, then the need for a large breach in the dike to provide fish passage is reduced if not eliminated, as the lesser flows of Beltz Creek and the unnamed creek entering from the south, would continue to pass into the fresh water marsh behind the dike and through the tide gate into Sand Lake.

As a result, the second component in our alternative action plan to an 18 foot breach in Beltz dike, is to install a "fish friendly" side hinge tide gate system in the dike to replace the existing obsolete top flap tide gate. Fish friendly side hinge tide gates have been used successfully throughout the western United States and Canada to allow fish passage into rivers, small creeks, sloughs and marshes. Many of the OPRD "fish passage stakeholders" listed above have installed or advocated the installation of fish friendly tide gates in Oregon, Washington and northern California. They have commissioned multiple studies confirming the effectiveness of these systems. The Beltz dike is a substantial basalt earthworks that can easily accommodate the installation of a new tide gate system. Since the dike will be the main visitor passage into the park, we can assume that its integrity will be maintained.

"Fish Friendly" side hinge tide gates systems allow fresh water to drain into an estuary during the low, outgoing tide naturally. The rising, incoming tide is allowed to flow into the fresh water estuary to a set level that limits the flood level in the fresh water estuary. The system during that time allows fish passage through the dike into the estuary and fresh water creeks. The tide gate then mechanically closes when it reaches the preset water level, controlling the tide water elevation within the fresh water estuary. The tide gate then reopens with the outgoing tide when the tide level drops below the water level in the fresh water estuary, once again allowing for fish passage through the tide gate. Several west coast manufacturers make fish friendly tide gates systems that meet Oregon and US Fish and Wildlife fish passage standards. These type of gate systems allow the for restoration of estuarine fish, plants and wildlife; they restore the

natural tidal flushing of marshes without flooding the upland property behind the dike; and they effectively control the tide level within the fresh water estuary at the predetermined desired flood levels. These type of tide gate systems have been funded, installed in dikes and levees, and studied extensively for their effectiveness by the Army Corp of Engineers, the Bonneville Power Administration, NOAA and the US Fish and Wildlife Service specifically at the Julia Butler Hansen Wildlife Preserve along the Columbia River and in the Skagit River Delta in Washington State.

We understand that the cheapest and most successful way to allow full fish passage into an estuary is to breach a dike. Economic and scientific study will support that process. But science and economics do not operate in a vacuum. In the case of the Julia Butler Hansen Refuge, the preserve was created to provide habitat for rare Columbia White Tail Deer. Full breach of the Refuge dikes for the most efficient fish passage would have eliminated the habitat for the endangered deer. In the case of the Skagit River project, the small community of Conway, Washington still needed to be protected from tidal flooding while providing fish passage through the dikes blocking sloughs along the delta. Breaching those dikes was not considered to be an option. Both examples are similar to the condition in the Sitka Sedge Natural Area. We want effective fish passage into and through the Sitka Sedge Natural Area but not at the sacrifice of the fresh water marsh habitat. Nor do we want to see decreased property values and increased safety risks for residents residing in the Tierra Del Mar community, due to uncontrolled tidal flooding. There are over two hundred homes in Tierra Del Mar with a conservative estimate of median value at \$200,000 each. Overall that approaches a total worth of \$45,000,000. Even a 10% reduction in property values would be significant. Of course, the worth of the security of community residents and visitors is incalculable.

We believe that the restoration of historic hydrologic conditions in the Sand Lake Tidal Estuary, as required by the conditions of the US Fish and Wildlife grant for the Sitka Sedge Natural Area can best be achieved by the combined action we propose as a sensible alternative to breaching the Beltz dike. Rerouting Reneke

Creek directly into the Sand Lake tidal Estuary, bypassing the dike and fresh water marsh, and allowing the reduced flows of Beltz and the other smaller creek to pass through a fish friendly tide gate system, best addresses all the needs and requirements of the OPRD fish passage stakeholders and the Tierra Del Mar community. We understand that the ongoing study of the hydrological conditions within the park and in the community of Tierra Del Mar will need to continue through 2017. We can then all effectively study those conditions throughout the dry and wet seasons of the year. We are counting on OPRD to make use of the next year for further study, to conscientiously review the conditions we have outlined and, to seriously consider the alternative action plan we have put forth. We believe that we all share a common vision for the Sitka Sedge Natural Area.

One last issue needs to be addressed. We understand that past studies as early as 1999 have recommended the breaching of the Beltz dike to fully qualify the Beltz Farm estuary for a compensatory wetland mitigation plan and the creation of wetland mitigation credits. Trevor Taylor is the OPRD representative for the Fish Passage Stakeholders group noted above. Mr. Taylor's expertise is in creating wetland mitigation banks, as he successfully did most recently for the City of Eugene, Oregon Parks Department. Wetland Mitigation Banking has become big business for governments throughout the country. Credits created by mitigating tidal wetlands are in great demand and are calculated on the number of acres that are restored to historic conditions. Banked wetland mitigations credits can be sold to private developers desiring to fill and build upon existing wetlands in areas they wish to profitably develop. Tidal wetland credits can be worth between \$50,000 and \$75,000 dollars per acre in Oregon according to some studies. There could be up to 50 acres of potential mitigated tidal wetlands within the Sitka Sedge Natural Area fresh water estuary if fully flooded. The full flooding of the fresh water marsh through an 18 foot breach in the Beltz dike, turning it back into an uncontrolled tidal wetland, could potentially be worth millions of dollars to the Oregon Parks and Recreation Department and the Oregon Department of Fish and Wildlife. If this is the case, it would certainly be

disingenuous of the OPRD and ODF&W to trade the sanctity of a unique fresh water marsh habitat and the security of a small historic coastal community simply for the opportunity to profit from the purchase of the park land.

In conclusion, the representatives of the Tierra Del Mar community need assurance that we will receive a timely response to our questions, and our requests for data and information regarding the current decision to breach Beltz dike. We need confirmation that the OPRD will take a year to review the decision to breach the dike and address the concerns we have outlined. We expect to be informed in a timely manner, as to the conclusions that are drawn by further study, and that we will be involved in the decisions that will be made regarding breaching the dike. At the same time, we expect a thoughtful response to our proposed alternative to breaching Beltz dike.

The representatives of the Tierra Del Mar Community,

Ellie Cairy, Tierra Del Mar Community Association (TDMCA) Board Member

Janice Eisele, Concerned Tierra Del Mar Resident

Andy Ewing, Concerned Tierra Del Mar Resident

Connie Ewing, TDMCA Board Member

Greg Kupillas, Concerned Tierra Del Mar Resident

Malia Kupillas, Concerned Tierra Del Mar Resident

Doug Maxwell, TDMCA Board Member

Buck Miller, Concerned Tierra Del Mar and Sand Lake Resident

Kathleen Miller, Concerned Tierra Del Mar and Sand Lake Resident

Jim Spring, TDMCA Chair

David Zine, Tierra Del Mar Representative to the Sitka Sedge Natural Area Advisory Committee, and Chair of the Friends of Sand Lake and Tierra Del Mar Community Steering Committee

From: kweiland@nrfd.com
To: [HEDSTROM Ben * OPRD](#)
Cc: [COMFORT Dennis * OPRD](#); [Jim Oeder](#); [HAYS Mickey](#); [WEILAND Kris](#); [Brian Jones](#)
Subject: RE: OPRD Beltz Plan Advisory Committee Meeting III
Date: Wednesday, March 23, 2016 9:02:54 AM

This conflicts with the Oregon Fire Chiefs Conference in Redmond Oregon. I will not be able to attend the meeting.

Please consider my comments as they directly effect how we will be able to handle park incidents or any other responding agency.

1. Access locations should be marked similar to the current beach access numbering signs. This will give any park goers or responders a start point. Also location markers within the system to help identify a close location to where help is needed.
2. Registration at access points enable responders to determine if a vehicle is found onsite for an extended period of time when the individual or group arrived and who is in the party that may need to be located. The cross walk from the parking area to the trail system on Sandlake Road should be well signed and have flashing cross walk signs similar to the signs located on Cape Kiwanda Drive near the Cape parking lot.
3. Well developed maps for responders that show the trail system, access points and key points that can be used in a search of the area. Also noting hazards or dangerous areas within the area. The outfalls for the dike system and gate/control points. Fenced locations where falls by hikers in to dike could occur.
4. Trails should be wide enough to access with a 4 wheel drive pick up. This is what we use to access beach areas and it will greatly assist in accessing a patient or a incident like a fire. A loop system would be best as it would allow for greater access or exit from the trail system. Installing removable bollards would allow for only emergency access into the trail system.
5. Cell phone coverage in that area is poor at best. A call box or some kind of emergency notification system will need to be established. If a "cell phone area" is located where cell coverage is found, it's location in the system should be marked on maps and signage posted in that area including directions from anywhere in the trail system to that location. Please consider these comments to improve the area so all can enjoy it.

Thank you.

Kris K Weiland
Fire Chief
Nestucca Fire & Rescue
503-392-3313 Office
503-812-1815 Cell
503-392-3733 Fax
kweiland@nrfd.com
"Together we make a difference"

----- Original Message -----

Subject: OPRD Beltz Plan Advisory Committee Meeting III

From: HEDSTROM Ben * OPRD <Ben.Hedstrom@oregon.gov>
Date: Tue, March 22, 2016 5:55 pm
To: HEDSTROM Ben * OPRD <Ben.Hedstrom@oregon.gov>
Cc: COMFORT Dennis * OPRD <Dennis.Comfort@oregon.gov>

You are receiving this message as member of the Beltz Plan Advisory Committee

OPRD has scheduled the following dates and times for the third and final round of public meetings for Sitka Sedge State Natural Area Planning:

Public Meeting III. Draft Plan Review | May 2016

At the third set of public meetings staff will present the draft master plan for public review prior to adoption by the OPRD Commission later this year.

Thursday May 5th at the Kiawanda Community Center

34600 Cape Kiwanda Drive, Pacific City 97135

- * 1-4 PM Advisory Committee*
- * 6-8 PM Public Meeting

Tuesday May 10th at the Wilsonville Library

8200 SW Wilsonville Road, Wilsonville, OR

- * 6-8 PM Public Meeting

*The public may attend the Advisory Committee meeting however, only comments from the committee will be taken at this meeting.

Please let me know if you have any questions. We look forward to seeing you at the meeting.

Ben Hedstrom
Design and Planning Coordinator
Oregon Department of Parks and Recreation | Integrated Park Services
725 Summer St NE Ste C | Salem, OR 97301-1266
(503) 986-0745

From: [Lorenz Arner](#)
To: [HEDSTROM Ben * OPRD](#); [Stipe David * OPRD](#)
Subject: Sitka Sedge dike
Date: Saturday, June 04, 2016 11:57:51 AM

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Ben Hedstrom, Design and Planning Coordinator
Integrated Park Services Section
Oregon Parks & Recreation Department
725 Summer Street N. E. Suite C
Salem, OR 97301

Dear Mr. Hedstrom

We are writing to you to express our concern about the proposed breaching of the dike in the new Sitka Sedge State Park.

My concern is in the forecast increase of the current water level in the adjacent populated area known as Tierra Del Mar. This area currently floods on heavy rains and a higher static water level in the area would make the area untenable and complicate any emergency operations in and through Tierra Del Mar. Sand Lake road (the road to and from and through Tierra Del Mar) would likely become impassible.

Potential adverse impact would be:

1. Flooding of existing homes and streets.
2. Cutting off access of emergency vehicles both north and south of Tierra Del Mar.
3. Preventing the timely evacuation of people on the Tierra Del Mar shore dune.

I sincerely hope your office will be able to point to a studied evaluation of the potential for disaster which shows our fears are unfounded.

Thank you

Lorenz and Lorlyn Arner
5730 Austin Ave.
Tierra Del Mar, Oregon

cc.

Oregon Office of Emergency Management
Tillamook County Emergency Management Office
Oregon Emergency Management Association
Senator Ron Wyden
Senator Jeff Merkley
Mark Labhart, Chairperson Tillamook County
Rep Betsy Johnson

Rep. Arne Roblan
Pacific City Station #82
Tierra Del Mar Steering Committee

From: [Michael Lilly](#)
To: [HEDSTROM Ben](#) * OPRD
Subject: Sitka Sedge State Natural Area Master Plan -- objection and records request
Date: Thursday, May 05, 2016 3:00:04 PM

My wife and I own an interest in the property on the east side of Sandlake Road and immediately adjacent to the SE corner of the **Sitka Sedge State Natural Area**

According to the map in the Master Plan, the state plans to flood a portion of our property when it breaches the dike. We object. This action will substantially increase the size of the wetland on our property and thereby impair the property's value. The state should not devalue private property without compensating the owners, and should not make such a radical decision without a full evidentiary hearing and a full understanding of the probable impact.

The plan map does not indicate the margins for error in the projected increased water levels, and we have no way to know how much of our property will be effected. Please provide a copy of all documents indicating the margins for mapping error which are expected.

Your meeting notices do not indicate the criteria by which the Park's Commission will make its decision. Please provide us with a copy of the criteria.

Michael J. Lilly and Jeanette M. Lilly
8490 SW Cecilia Terrace
Portland, OR 97223
503-752-2515