

Oregon Parks and Recreation Commission

February 24, 2022

Agenda Item:	9b	Action
Public Comment Allowed:	No	
Topic:	Request to adopt rule change of OAR 736-010-0055 Park Resources to clarify hunting boundaries	
Presented by:	Helena Kesch, Policy Analyst, ADA and Tribal Relations Coordinator	

Background:

Hunting is permitted in several state parks within Oregon Department of Fish and Wildlife (ODFW) rules and regulations. Access to hunt on OPRD lands is provided in state parks where public safety is low risk and the activities meet agency wildlife goals.

The current rule specifies each area within a park that is open to hunting. For the Willamette River Greenway, some of those properties have changed management or are inaccurately described.

The proposed rule change will clarify hunting boundaries within state parks by referring to an OPRD hunting map that will be located on the agency website. The rule will direct people to adhere to ODFW rules and regulations when hunting on park properties.

Clarifying the hunting boundaries within this rule will help protect visitors and hunters alike. A hunting map will be created and made available on the agency website for hunters to refer to in identifying hunting boundaries at each park where hunting is available per this rule.

A Rule Advisory Committee (RAC) was held virtually on November 18th. The RAC included members of the hunting community that frequently hunt in permissible state park locations, as well as ODFW, Oregon State Police Fish and Game Division and OPRD park managers and staff members to add expertise on the operational implication of this clarification. The committee discussed clarifying hunting boundaries within state parks and the creation of an OPRD hunting map that will clearly identify hunting areas within park boundaries. They recommended posting the hunting map on the department website for a minimum of 30 days prior to the effective date. They also recommended adding language to this rule referring people to OAR 736-010-0040 (7) which prohibits leaving personal property or possessions overnight in a day use area.

The proposed rules opened for public comment on December 3, 2021 and reflected changes recommended by the RAC. Public comment was open December 3, 2021 to January 27, 2022. Comments received are posted on a weekly basis on the agency rulemaking website. A virtual public meeting was held January 18th at 6pm that reviewed the recommended changes by the RAC and displayed a draft of the hunting map. Additional comments were accepted. The agency received 28 comments during this period. The full of comments received is available on the [agency rulemaking website](#) and is also attached. Fifteen of the public comments received are in favor of the changes. Eleven comments were opposed. The Oregon Hunters Association submitted comment in support of the rule change. Those opposed are from LaPine residents requesting hunting not be allowed in LaPine State Park due to safety concerns. After seeing these concerns, the park staff are reviewing hunting areas within the park to determine how best to address concerns raised. Two responses were categorized as other: requesting hunting maps be posted in all state parks and a request to allow hunting in Cougar Valley State Park.

The OPRD Hunting Map will provide clear hunting boundary information for each park property where hunting is allowed, which incorporates safety zones established by the agency. Prior to posting the OPRD Hunting Map online, it will be posted on the department website for 30 days for public review and comment. The OPRD Hunting Map will be shared with 3rd party providers so that the data can be incorporated into existing applications used.

Prior Action by Commission: The Commission approved opening rulemaking of OAR 736-010-0055 Park Resources to clarify hunting boundaries at the November 2021 meeting.

Action Requested: Staff requests adoption of amendments to OAR 736-010-0055 to implement changes based on clarifying hunting boundaries within Oregon State Park properties and the creation of an OPRD Hunting Map.

Attachments: Attachment A Marked Copy. Attachment B Clean Copy. Attachment C OPRD Hunting Map. Attachment D Summary of Comments.

Prepared by: Helena Kesch

Chapter 736
Parks and Recreation Department

736-010-0055
Park Resources

(1) A person may not excavate, injure, disturb, destroy, alter or remove any archaeological, cultural, or historical site, object, or material from a park property, unless authorized by the director as defined in ORS 390.235 and OAR 736-051-0060 to 736-051-0080.

(2) A visitor may only conduct the following activities with the written permission of the director, manager, or designated park employee unless the activity is specifically allowed by other sections of this rule:

- (a) Dig up, or remove any sand, soil, rock, historical, or fossil materials;
- (b) Place, remove, roll, or move any stones, logs or other objects that may endanger a person or damage park resources;
- (c) Pick, cut, mutilate, trim, uproot, or remove any living vegetation;
- (d) Harass, disturb, pursue, injure or kill wildlife; or
- (e) Introduce or release animals onto the park property.

(3) A person may remove small quantities of natural materials from a park property for personal use without written permission of the department, but only if done in accordance with the following provisions:

- (a) Collection is done at a park property or portion of a park property at which the department has not specifically prohibited the removal of natural products either by location or time of year through the posting of signs, publishing of maps or brochures, or indicating on the state park website; and
- (b) Collection is for souvenirs that may serve as a reminder of a person's park visit and includes only a small quantity of agates and other rocks, driftwood, or similar non-living items collected for non-commercial, personal use.

(4) Notwithstanding section (2) or (3), a person must comply with existing state and federal rules and regulations concerning mining or the protection of public archeological features or artifacts on state and federal lands.

(5) Unless otherwise posted a person may gather for personal consumption berries, fruits, mushrooms, or similar edibles in quantities not to exceed ~~five-one~~ gallons per person per day.

(6) A person may not uproot living plants or collect roots, tubers, flowers, and stems except with written permission of the park manager or designated park employee and only for scientific collection or research purposes, or by a member of a federally recognized Oregon tribe for personal consumption as part of their traditional religious, medicinal, or other customary cultural heritage practices.

Driftwood may be taken in small amounts in accordance with OAR 736-026-0010.

(7) A person may only give or offer food items to wildlife within a park property when authorized by the park manager.

~~(8) Hunting is not allowed in any area closed by the director or designee for public safety or park resource protection purposes. The department shall post safety zone signs at designated primary park entry points, park entrances.~~

~~(98) ~~Discharging of firearms~~ Hunting, shooting and trapping is prohibited in park properties except while ~~A person or handler may only hunting and trapping~~, pursue, trap, kill, injure, molest, or remove any wildlife or disturb their habitats within a park property ~~under the following provisions:~~~~

~~(a) In compliance with Oregon Department of Fish and Wildlife (ODFW) hunting rules and regulations, and~~

~~(b) (a) In those park properties where hunting of game species and unprotected species and trapping is specifically allowed by this rule, ~~but and~~~~

~~(c) With written authorization by the park manager, ~~trapping is permitted only at park properties that are open Willamette Greenway parcels open to hunting and with written authorization by the park manager, and~~~~

~~(d) Unprotected species can only be hunted during authorized deer, elk and game bird hunting seasons, except as authorized by the park manager, and~~

~~(e) In areas only In areas identified on OPRD Hunting Map found at the department website.~~

~~(f) Hunting shall be permitted with shotguns or bows and arrows only during ODFW authorized seasons in designated parks, unless otherwise specified in this section. Refer to OPRD Hunting Map for location and details on game species permitted for hunting at each park location.~~

~~(g) Hunting shall be permitted with rifle in portions of LaPine State Park, Cottonwood Canyon State Park and Deschutes River State Recreation Area only during ODFW authorized seasons. Refer to OPRD Hunting Map for location and details on game species permitted within the park.~~

~~(d) Hunting is not allowed in any area closed by the director or designee for public safety or park resource protection purposes. The department shall post safety zone signs at designated park entrances, in compliance with the rules and regulations of the Oregon Department of Fish and Wildlife. In ~~(d)~~ Hunting waterfowl is allowed in a portion of the following park boundaries: ~~parks that allow hunting in a portion of the boundaries include:~~~~

(A) Benson State Recreation Area

(B) Bowers Rock State Park

(C) Elijah Bristow State Park

(D) Fort Stevens State Park

(E) Government Island State Recreation Area and Lemon Island

(F) Mayer State Park

(G) Rooster Rock State Park

(H) Starvation Creek State Park

(I) Succor Creek State Park

(J) Grand Island in Yamhill County

(I) At Succor Creek State Park only hunting of upland game birds is allowed in a portion of the park.

(f) Hunting of game mammals, game birds species and unprotected species is allowed in a portion of the following park boundaries:

(A) Willamette River Greenway park properties

(B) Luckiamute State Natural Area

(C) Cottonwood Canyon State Park

(D) Deschutes River State Recreation Area

(E) LaPine State Recreation Area

(gb) In those park areas where hunting is allowed, dogs being used for hunting game birds or unprotected wildlife or being trained for hunting or tracking shall be in the handler's control at all times. Dogs used for hunting shall be kept on a leash, except:

(A) While controlled by a licensed hunter when being used to hunt game birds, including going to or coming from hunting locations; and

(B) In a posted dog training area.

(e) While seasonally hunting waterfowl at the following park properties:

(A) Bowers Rock State Park;

(B) That portion of Elijah Bristow State Park located north of the main channel of the Middle Fork of the Willamette River;

(C) Portions of Fort Stevens State Park adjacent to Trestle Bay as posted;

(E) That portion of Government Island State Recreation Area including the perimeter of both Government and Lemon Islands, not above the mean high water mark as posted;

(F) That portion of Rooster Rock State Park which includes Sand Island as well as the bank which runs parallel to the south of the island, except during the special waterfowl hunting season which starts in September, as posted;

~~(G) That portion of Benson State Recreation Area at Dalton Point, north of I-84, starting 300' east of the boat ramp running to the eastern most tip of the property at river mile 134 as posted;~~

~~(H) That portion of Starvation Creek State Park, north of I-84, river mile 159.6 to 160.2 as posted;~~

~~(I) That portion of Mayer State Park including the entire Salisbury Slough area and the pond 800' Northwest of the boat ramp as posted.~~

~~(d) Seasonal hunting of game wildlife is allowed within Deschutes River State Recreational Area south of the stream gauge cable crossing line and parallel extensions of the cable crossing line to the east and west park boundaries.~~

~~(e) Seasonal hunting of deer, upland birds, and waterfowl is allowed within Luckiamute State Natural Area, except within 500 feet of parking lots and posted Safety Zones.~~

~~(fe) Seasonal hunting of deer is allowed in portions of La Pine State Recreation Area north of the east-west power line road, approximately one mile north of the campground booth.~~

~~(gf) Seasonal hunting of game wildlife and upland game birds is allowed on department property at Cottonwood Canyon State Park except:~~

~~(A) Hunting is not allowed within the 200 yard area surrounding the boat launch at the J.S. Burres site at Cottonwood Bridge, and~~

~~(B) Hunting is not allowed in any area closed by the director or designee for public safety or park-resource protection purposes. The department will post such closures at designated park entrances.~~

~~(hg) Seasonal hunting of upland game birds is allowed in Succor Creek State Park, except within 500 feet of camping areas located near the Succor Creek Bridge and posted Safety Zones.~~

~~(i) Hunting is not allowed in any area closed by the director or designee for public safety or park-resource protection purposes. The department will post Safety Zones signs around such areas.~~

~~(hj) Trapping is allowed only by special permit from the department in Bowers Rock State Park, Deschutes State Recreation Area, Elijah Bristow State Park, and Willamette Mission State Park.~~

~~(ki) Hunting is allowed permitted for deer, upland birds and waterfowl with shotguns or bows and arrows only, during authorized seasons in parks.all Willamette River Greenway on game species permitted for hunting at each park location parcels, except in those parcels described below, where all hunting is prohibited:~~

~~-(h) OPRD Hunting Map will detail species open to hunting at each park location.~~

~~(A) Wapato Access (Virginia Lake), River Mile 17.0-18.0, Multnomah Channel, Right bank when facing downstream;~~

~~(B) Oswego Creek Outlet Access, River Mile 21.3, Main Channel, Left Bank when facing downstream;~~

~~(C) Merrell OPRD W07 (Mary S. Young State Park), River Mile 23.6, Main Channel, Left Bank when facing downstream;~~

~~(D) Willamette Shores, Inc. OPRD W07 (Mary S. Young State Park), Main Channel, River Mile 24.0, Main Channel, Left Bank when facing downstream;~~

~~(E) Rock Island Landing, River Mile 29.75-30.2, Main Channel, Left Bank when facing downstream; hunting prohibited due to lease agreement with METRO, a portion of the property is a designated State Natural Area Reserve under OAR 736-045-XXX and proximity to development~~

~~(FH) Coalea Landing, River Mile 30.67, Main Channel, Right Bank when facing downstream;~~

~~(GJ) Pete's Mountain Landing, River Mile 30.68, Main Channel, Left Bank when facing downstream;~~

~~(KH) Peach Cove Landing, River Mile 301.85, Main Channel, Left Bank when facing downstream;~~

~~(I) OPRD W12 River Mile 31.5, Main Channel, Left Bank when facing downstream;~~

~~(JL) OPRD W13, River Mile 312.80, Side Main Channel, Left Bank when facing downstream;~~

~~(KM) OPRD W15, River Mile 34.1, Main Channel, Left Bank when facing downstream;~~

~~(L) OPRD W16, River Mile 34.4, Main Channel, Left Bank when facing downstream;~~

~~(M) OPRD W17, River Mile 34.6, Main Channel, Left Bank when facing downstream;~~

~~(NN) Molalla River State Park, River Mile 34.6-36.1, Main Channel, Right Bank when facing downstream NOTE: hunting is not allowed along the Molalla River within the park property.~~

~~(O) Molalla Landing, River Mile 35.5, Main Channel, Left Bank when facing downstream; hunting prohibited due to proximity of adjacent homes and small size~~

~~(OP) Willamette Meridian Landing, River Mile 37, Main Channel, Left Bank when facing downstream;~~

~~(PQ) French Prairie Access, River Mile 41.0, Main Channel, Right Bank when facing downstream;~~

~~(R) OPRD W22, River Mile 41.7, Main Channel, Left Bank when facing downstream;~~

~~(SQ) Parrett Mountain Access, River Mile 45.5-46.0, Main Channel, Left Bank when facing downstream;~~

~~(RT) Hess Creek Landing, River Mile 53, Main Channel, Left Bank when facing downstream;~~

~~(U) OPRD W26, River Mile 56.4, Main Channel, Left Bank when facing downstream;~~

~~(V) Spring Valley Access, River Mile 74.7, Main Channel, Left Bank when facing downstream;~~

~~(SW) Lincoln Access, River Mile 76.2-77.0, Main Channel, Left Bank when facing downstream;~~

~~(XT) Doak's Ferry Access, Mile 77.6, Main Channel, Left Bank when facing downstream;~~

~~(YU) Darrow Bar Access, River Mile 78.1, Main Channel, Left Bank when facing downstream; hunting prohibited due to developed trails, proximity to adjacent homes and small size;~~

~~(Z) Darrow Rocks Landing, River Mile 78.7, Main Channel, Left Bank when facing downstream; hunting prohibited due to small size;~~

~~(AA) McLane Island Landing, River Mile 82.8, Main Channel, Middle of River when facing downstream;~~

~~(WBB) Hall's Ferry Access, River Mile 91.3, Main Channel, Right Bank when facing downstream;~~

~~(CC) Springhill Access, River Mile 113.8, Main Channel, Left Bank when facing downstream;~~

~~(DD) OPRD W52, River Mile 119.9, Main Channel, Left Bank when facing downstream;~~

~~(EE) OPRD W53, River Mile 120.1, Main Channel, Left Bank when facing downstream;~~

~~(FF) OPRD W54, River Mile 120.3, Main Channel, Left Bank when facing downstream;~~

~~(GG) Truax Island Access, River Mile 128, Main Channel, Right Bank when facing downstream (closed only for 500 feet west of parking area);~~

~~(HH) River Jetty Landing, River Mile 135.9, Main Channel, Left Bank when facing downstream; hunting prohibited due to the fact that it is less than 3 acres above water, it is about 300 feet across, and is within shooting distance of a Corvallis neighborhood;~~

~~(I) Browns Landing, River Mile 167.25, Main Channel, Left Bank when facing downstream;~~

~~(KK) Marshall Island Access (Banton), River Mile 168.7, Main Channel, Left Bank when facing downstream;~~

~~(LL) Christensen Landing, River Mile 168.7, Main Channel, Right Bank when facing downstream; hunting prohibited due to its size of less than 3 acres. Also, if you examine the properties that allow hunting most of them are boat in only. Christensen has a road in and a boat ramp;~~

~~(MM) Glassbar Island: River Mile 187.2, Main Channel, Left Bank when facing downstream;~~

~~(NN) Log Jam Landing, River Mile 194, Middle Fork, Left Bank when facing downstream;~~

~~(OO) Log Jam Access, River Mile 194.4-194.8, Middle Fork, Left Bank when facing downstream;~~

~~(ZPP) Jasper Bridge Access, River Mile 195.2, Middle Fork, Right Bank when facing downstream;~~

~~(AA) OPRD W52, River Mile 119.9, Main Channel, Left Bank when facing downstream;~~

~~(BB) OPRD W53, River Mile 120.1, Main Channel, Left Bank when facing downstream;~~

~~(CC) OPRD W54, River Mile 120.3, Main Channel, Left Bank when facing downstream;~~

~~(DD) Browns Landing, River Mile 167.25, Main Channel, Left Bank when facing downstream;~~

~~(EE) Truax Island Access, River Mile 128, Main Channel, Right Bank when facing downstream (closed only for 500 feet west of parking area);~~

~~(FF) Marshall Island Access (Banton), River Mile 168.7, Main Channel, Left Bank when facing downstream;~~

~~(GG) Log Jam Access, River Mile 194.4-194.8, Middle Fork, Left Bank when facing downstream;~~

~~(HHQQ) Pengra Access, River Mile 19.5-20.2, Middle Fork, Right Bank when facing downstream;~~

~~(HRR) Cougar Mountain Access, River Mile 15.5, Coast Fork, Right Bank when facing downstream;~~

~~(JSS) Lynx Hollow Access, River Mile 16.5, Coast Fork, Left Bank when facing downstream;~~

~~(j) Glassbar Island: hunting prohibited due to its proximity to housing, the interstate, and the Eugene/Springfield UGB;~~

~~(j) Christensen Landing: hunting prohibited due to its size of less than 3 acres. Also, if you examine the properties that allow hunting most of them are boat in only. Christensen has a road in and a boat ramp;~~

~~(j) River Jetty (downstream parcel): hunting prohibited due to the fact that it is less than 3 acres above-water, it is about 300 feet across, and is within shooting distance of a Corvallis neighborhood;~~

~~(j) Spring Valley: hunting prohibited due to designated trail development throughout the property and adjacent homes;~~

~~(j) Molalla Landing: hunting prohibited due to proximity of adjacent homes and small size;~~

~~(j) OPRD W26, W22, W17, W16, W12: hunting prohibited due to proximity to adjacent homes and small size. Some properties under lease with METRO; and~~

~~(j) Rock Island Landing: hunting prohibited due to lease agreement with METRO, a portion of the property is a designated State Natural Area Reserve under OAR 736-045-XXX and proximity to development~~

~~(j) Trapping is allowed only with written authorization from the department in the Willamette River Greenway parcels closed to hunting, as listed above. Trapping is allowed in all other Willamette River Greenway parcels.~~

~~(k) When hunting on those properties allowed by this rule hunters may not erect structures or blinds with the exception of portable blinds and tree stands that must be removed daily.~~

(i) Hunters shall not leave personal property or possessions overnight as per OAR 736-010-0040 (7).

Statutory/Other Authority: ORS 390.124

Statutes/Other Implemented: ORS 390.111, 498.002, 498.006

Chapter 736
Parks and Recreation Department

736-010-0055
Park Resources

(1) A person may not excavate, injure, disturb, destroy, alter or remove any archaeological, cultural, or historical site, object, or material from a park property, unless authorized by the director as defined in ORS 390.235 and OAR 736-051-0060 to 736-051-0080.

(2) A visitor may only conduct the following activities with the written permission of the director, manager, or designated park employee unless the activity is specifically allowed by other sections of this rule:

(a) Dig up, or remove any sand, soil, rock, historical, or fossil materials;

(b) Place, remove, roll, or move any stones, logs or other objects that may endanger a person or damage park resources;

(c) Pick, cut, mutilate, trim, uproot, or remove any living vegetation;

(d) Harass, disturb, pursue, injure or kill wildlife; or

(e) Introduce or release animals onto the park property.

(3) A person may remove small quantities of natural materials from a park property for personal use without written permission of the department, but only if done in accordance with the following provisions:

(a) Collection is done at a park property or portion of a park property at which the department has not specifically prohibited the removal of natural products either by location or time of year through the posting of signs, publishing of maps or brochures, or indicating on the state park website; and

(b) Collection is for souvenirs that may serve as a reminder of a person's park visit and includes only a small quantity of agates and other rocks, driftwood, or similar non-living items collected for non-commercial, personal use.

(4) Notwithstanding section (2) or (3), a person must comply with existing state and federal rules and regulations concerning mining or the protection of public archeological features or artifacts on state and federal lands.

(5) Unless otherwise posted a person may gather for personal consumption berries, fruits, mushrooms, or similar edibles in quantities not to exceed one gallon per person per day.

(6) A person may not uproot living plants or collect roots, tubers, flowers, and stems except with written permission of the park manager or designated park employee and only for scientific collection or research purposes, or by a member of a federally recognized Oregon tribe for personal consumption as part of their traditional religious, medicinal, or other customary cultural heritage practices.

(7) Driftwood may be taken in small amounts in accordance with OAR 736-026-0010.

(8) A person may only give or offer food items to wildlife within a park property when authorized by the park manager.

(9) Hunting is not allowed in any area closed by the director or designee for public safety or park resource protection purposes. The department shall post safety zone signs at primary park entry points.

(10) Hunting, shooting and trapping is prohibited in park properties except under the following provisions;

(a) In compliance with Oregon Department of Fish and Wildlife (ODFW) hunting rules and regulations, and

(b) In those park properties where hunting of game species and unprotected species is specifically allowed by this rule, and

(c) With written authorization by the park manager, trapping is permitted only at park properties that are open to hunting, and

(d) Unprotected species can only be hunted during authorized deer, elk and game bird hunting seasons, except as authorized by the park manager, and

(e) In areas identified on OPRD Hunting Map found at the department website. Proposed zones will be posted on the department website for a minimum of 30 days prior to the effective date.

(f) Hunting shall be permitted with shotguns or bows and arrows only during ODFW authorized seasons in designated parks, unless otherwise specified in this section. Refer to OPRD Hunting Map for location and details on game species permitted for hunting at each park location.

(g) Hunting shall be permitted with rifle in portions of LaPine State Park, Cottonwood Canyon State Park and Deschutes River State Recreation Area only during ODFW authorized seasons. Refer to OPRD Hunting Map for location and details on game species permitted within the park.

(h) Hunting waterfowl is allowed in a portion of the following park boundaries:

(A) Benson State Recreation Area

(B) Bowers Rock State Park

(C) Elijah Bristow State Park

(D) Fort Stevens State Park

(E) Government Island State Recreation Area and Lemon Island

(F) Mayer State Park

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(J) At Succor Creek State Park only hunting of upland game birds is allowed in a portion of the park.

(i) Hunting of game mammals, game birds and unprotected species is allowed in a portion of the following park boundaries:

(A) Willamette River Greenway park properties

(B) Luckiamute State Natural Area

(C) Cottonwood Canyon State Park

(D) Deschutes River State Recreation Area

(E) LaPine State Recreation Area

(j) Dogs shall be kept on a leash, except:

(A) While controlled by a licensed hunter when being used to hunt game birds, including going to or coming from hunting locations; and

(B) In a posted dog training area.

(j) Hunters may not erect structures or blinds with the exception of portable blinds and tree stands that must be removed daily.

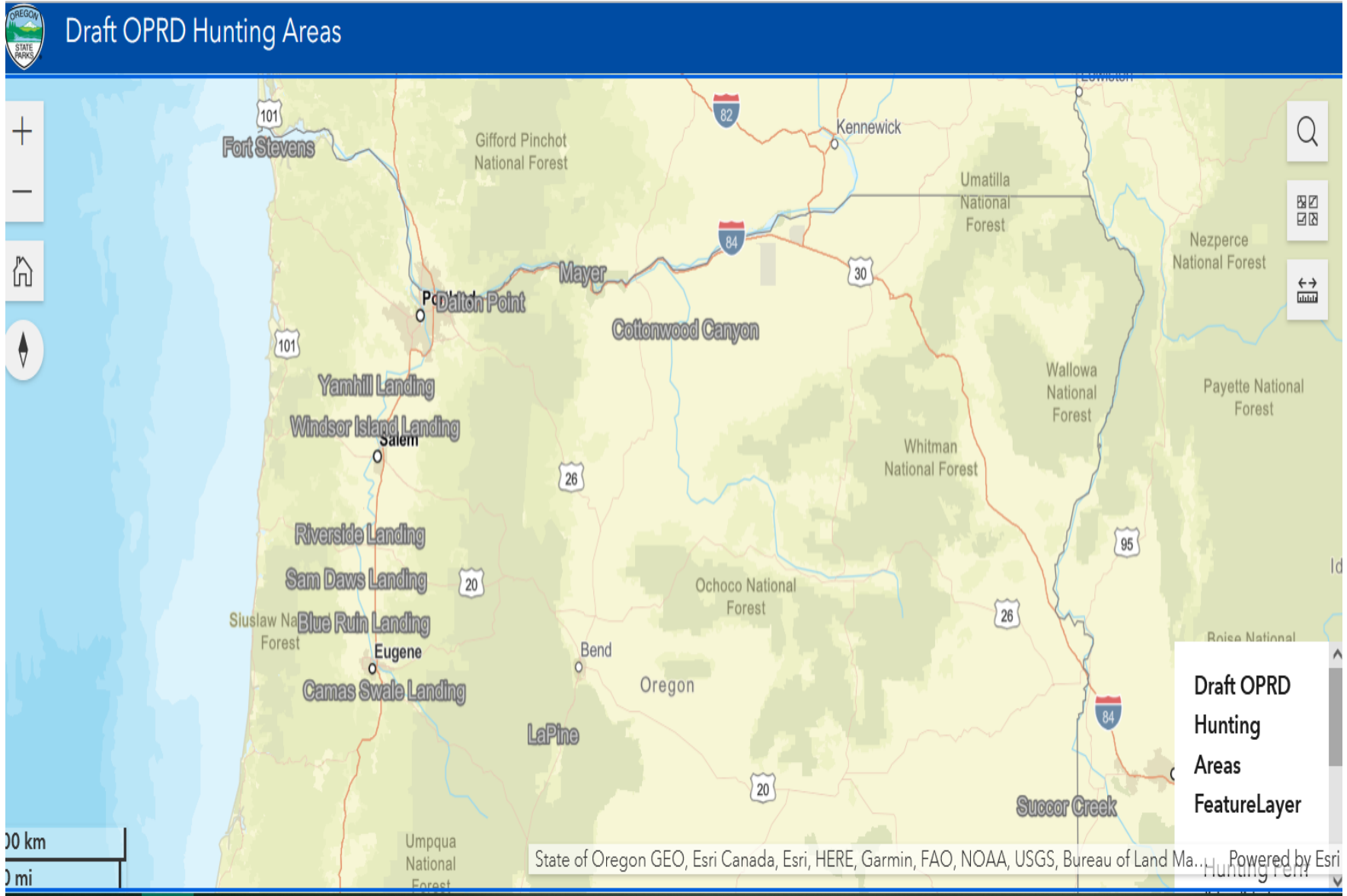
(k) Hunters shall not leave personal property or possessions overnight as per OAR 736-010-0040 (7).

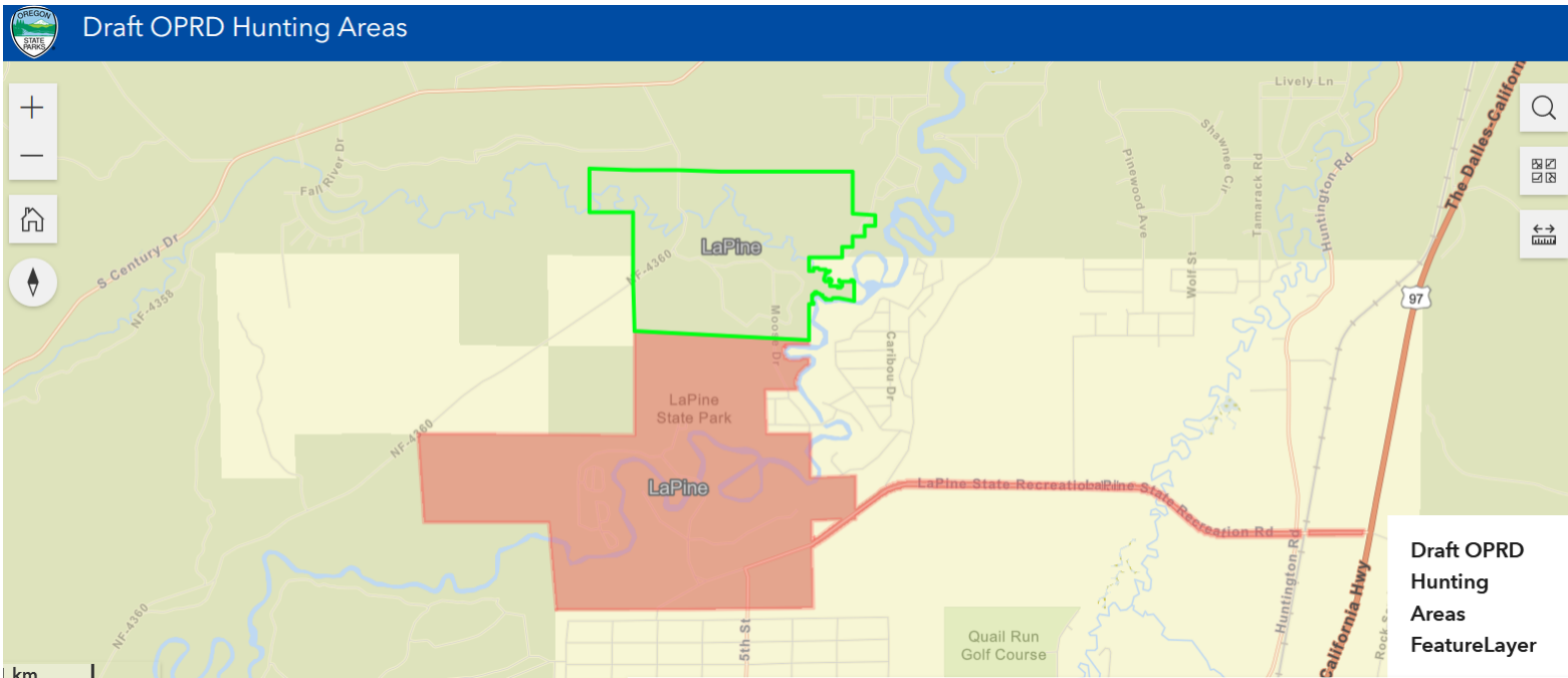
Statutory/Other Authority: ORS 390.124

Statutes/Other Implemented: ORS 390.111, 498.002, 498.006

9b: Attachment C OPRD Hunting Map

Draft OPRD Hunting Map <https://experience.arcgis.com/experience/35a4e8b9deaa4665b5360a70aa03adde/>





LaPine [Close] [Reset]

Game Birds: Yes

Game Mammals: Yes

Trapping: Permitted with written authorization of the park manager

Unprotected species can only be hunted during authorized deer, elk and game bird hunting seasons, except as authorized by the park manager

Permitted Hunting Methods:

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LaPine [Close] [Reset]

Permitted Hunting Methods:

Shotgun & Bow: Hunting shall be permitted with shotguns or bows and arrows only during ODFW authorized seasons in designated parks.

Rifle: Hunting shall be permitted with rifle.

Last edited by orstateparks on 1/15/2022, 1:00 PM.

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9b: Attachment C

9b: Attachment D Summary of comments

Park resources rules were open from December 3, 2021 to January 27, 2022. The agency received 28 comments during that period. The full text of comments received is available on the [agency rulemaking website](#). Additionally, a public hearing was held virtually on January 18. One public comment was submitted during this hearing in support of the rule change.

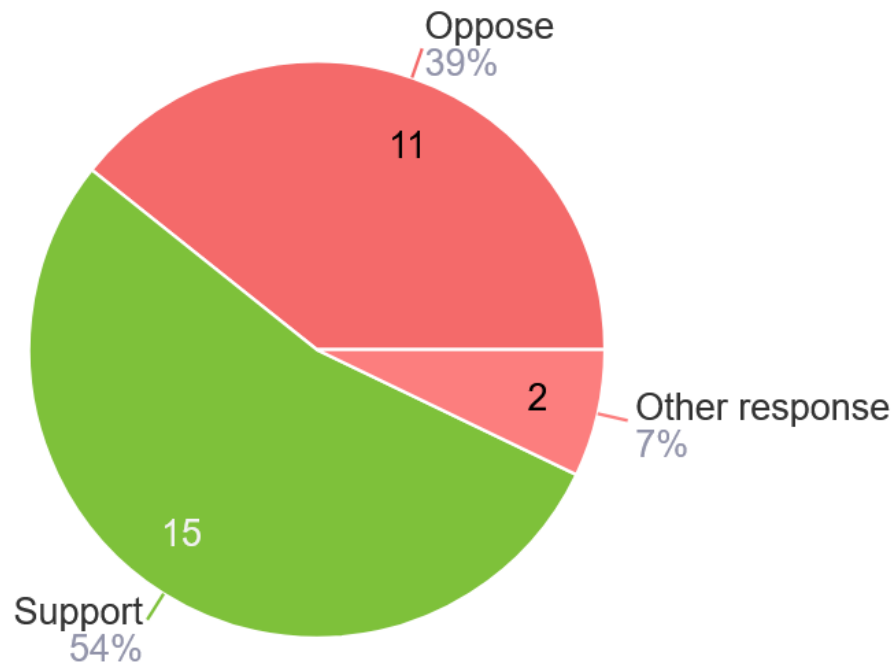
Fifteen of the public comments received are in support of updating the rule to clarify hunting boundaries and create an OPRD Hunting Map. Eleven comments in opposition are from LaPine residents requesting hunting not be allowed in LaPine State Park due to safety concerns. After seeing these concerns, the park staff are reviewing hunting areas within the park to determine how best to address concerns raised. Two responses were categorized as other: requesting hunting maps be posted in all state parks and a request to allow hunting in Cougar Valley State Park.

The OPRD Hunting Map will provide clear hunting boundary information for each park property where hunting is allowed, which incorporates safety zones established by the agency. Prior to posting the OPRD hunting map online, it will be posted on the department website for 30 days for public review and comment. The OPRD Hunting Map will be shared with 3rd party providers so that the data can be incorporated into existing applications used.

Hunting Rule Clarification

Response Summary

28 Responses



9b Attachment D Summary of comments

First name	Comment	Type	Topic
Zachary Roush	As a new hunter in Oregon, I would greatly appreciate clarification on where hunting is permitted on Oregon public lands. I fully support the creation of a map with clearly outlined boundaries and access points. If there is the possibility to make it an interactive map, the way that ODFW has for their Travel Management Areas, so that hunters can track their location on the map while offline using GPS, that would help immensely for being sure of land ownership, informing others of hunters' location, and staying within the boundaries.	Support	Hunter
David Rieben	For several years I have struggled to understand what are allowable hunting boundaries within the Willamette Greenway. I understand there is a significant effort currently underway to generate a map clearly describing what is open to hunters and what is not. This is a FANTASTIC idea and well worth the effort! My one caution is this: Over the years it seems to me that public hunting lands are restricted, discouraged, and ultimately taken away. The attitude seems all too often to favor anyone enjoying the outdoors with a bicycle, etc while fearing anyone who may choose to harvest game with a firearm outdoors. Please do not reduce the available areas in which the public is free to spend time afield hunting. It is a fantastic tradition and we are all owners of this state and river system. Please preserve our freedoms in the process of generating a map.	Support	Hunter

<p>Talha Khan</p>	<p>I sincerely appreciate OPRD for allowing hunting in Oregon State Parks where public safety is low risk. Some of my most cherished memories have been created at Oregon State Parks on bird-hunting trips with my father. Please continue to allow and expand hunting in properties where appropriate. I agree that OAR 736-010-0055 needs to be updated, particularly for the Willamette River Greenway Corridor parcels. The current rule states that "Hunting is allowed... in all Willamette River Greenway Corridor parcels, except..." followed by an unwieldy list of 36 properties, which makes it difficult to determine where hunting is allowed. Having said that, the proposed OPRD hunting maps must be made available for public review before adopting the rule change. The proposed OPRD hunting maps need to be part of the review process with public comment to ensure that hunting access is not inadvertently reduced. Also, it is being proposed to omit all language that indicates locations where hunting is allowed or prohibited, from the OAR. Since the map itself cannot be part of the OAR, it could be modified without going through the formal OAR change process. I am concerned about hunting access being reduced without going through public comment. If the objective is to clarify the hunting boundaries, why not maintain the language that indicates hunting locations in the OAR, while also publishing the OPRD hunting map? Thank you for your consideration.</p>	<p>Support</p>	<p>Provide hunting map to public to comment prior to changes</p>
<p>Stan Porter</p>	<p>Clarification of hunting in Oregon State Parks is needed to education the citizens of Oregon. A clear boundary explanation and signage would help all know where hunting is allowed. Oregon State Parks needs to work with map app companies to show the boundaries on all forms of GPS apps for hiking and hunting. Boundary signs need to be placed upon the boundaries and maps at information areas in the campgrounds need to let campground users know that hunting is allowed in a park and show the boundaries. Sharing the forests and public land is important and all users would benefit from knowing the boundaries for park useage.</p>	<p>Support</p>	<p>Hunting map educates</p>

Mike Totey	<p>The Oregon Hunters Association (OHA) is a conservation organization with 10,000 members in 26 chapters across Oregon. OHA values our public lands as a place to hunt and recreate, and also as valuable habitat for the wildlife we care about. As such, the management of these lands, and our hunting opportunities are important to OHA. We are providing comments on the proposed amending of OAR 736-010-0055 to update park resource rules to clarify hunting boundaries.</p> <p>OHA supports the proposed amending of OAR 736-010-0055 to update park resource rules to clarify hunting boundaries as submitted by the Oregon Parks and Recreation Department (OPRD). The proposed amendments will not eliminate any hunting opportunities on OPRD lands and moving from written descriptions in the OAR to a mapped format will allow users to more accurately identify areas where hunting is allowed.</p> <p>OHA is supportive of innovative efforts to clarify hunting boundaries and we believe that maps and associated programs (i.e., phone applications) will add value to the users, decrease potential use conflicts, and identify areas for enforcement if needed.</p> <p>As hunters of Oregon transition to a mobile platform for licenses, tags, and permits, these electronic maps should be made available through the ODFW and OPRD outreach platforms as this will make these recreation opportunities more clear to the users.</p> <p>OHA is supportive of, and encouraged by OPRD’s proactive approach to clarify the hunting area boundaries on these valuable public properties.</p> <p>Sincerely; Mike Totey Conservation Director Oregon Hunters Association</p>	Support	Hunter
Jacob Gibson	<p>I would like to see the parks open for night time. There are curfews on the willamette parks I use and I’ve been harassed for hiking to my fishing spot before daylight. As well as it should be open for raccoon hunting which takes place at night.</p>	Support	Hunter

Randy Davis	<p>Dear Oregon Parks and Recreation Commission,</p> <p>I'm writing in favor of clarifying hunt area boundaries within specific state parks where hunting is allowed, and expand hunting access to other state parks where hunting would make sense (hunnable populations of game, low risk of conflict with other user groups). Legal, ethical hunting is an important aspect of wildlife conservation within the state of Oregon, and legal, ethical hunters want to make sure they hunt only where they are supposed to, thus avoiding conflict with other user groups. A clear map of hunt area boundaries (especially if available on gps systems like OnX) will ensure this, and save the state the resource hassle of posting the boundaries. Any move the state makes to responsibly open more hunting access is a win.</p>	Support	Hunter
Adam Neff	<p>I support the proposal and the continued allowance of hunting in some OR State Parks where it is appropriate, and clarifications to said boundaries should be easy to change as deemed appropriate, simply publishing a map should be sufficient to identify the boundaries.</p>	Support	Support of rule and hunting map
Will H	<p>I support the use of maps rather than verbal descriptions to codify where individuals may hunt. I believe that the rule should refer to a boundary, rather than a map. "Hunters in XYZ state park are limited to the xyz state hunting zone." This zone should be depicted on a map available on the website, but also should be hosted as a WMS or JSON layer that individuals can utilize, and/or on a webmap on the website. There are many vendors that make "hunting apps" which allow hunters to see their location versus various boundaries. Providing this data publicly in a consumable geospatial format would allow those vendors to add those boundaries into their products, allowing hunters to know exactly where they are in relation to the hunt boundary.</p>	Support	Support of rule and hunting map
Mike Shulters	<p>I am in support of making it easier for the public to know if legal hunting is allowed or not allowed in certain areas. I think it would be great if this extended to all public lands within the state of Oregon, such as city and county owned properties as well</p>	Support	Support of rule and hunting map

Ricky Clark	<p>Hunting is an important pastime to many Oregonians, and outdoor recreation has recently had a resurgence. The locavore movement is creating a sort of renaissance in the hunting culture, and many new people are finding that hunting can be an impactful way for them to obtain food while simultaneously combating climate change.</p> <p>A few years ago there was a study done addressing declining hunter numbers. The impetus of the study was to try and address the problems before hunter recruitment began impacting Pittman Robertson funds to the detriment of the agencies tasked with managing our wonderful public lands. Ranked highly among reasons that people had quite hunting was a loss of access.</p> <p>Oregon is blessed with ample federal public lands, but often getting to these areas from population centers can be difficult. State lands offer Oregonians a diverse spread of public lands to recreate on, often times in good proximity to home. I would encourage the department to pursue their goal of clarifying hunting rules in state parks, and provide as much information as possible. Maps and on location postings are always great, but it would also be helpful to have this information in an accessible online portal. Many hunters and outdoorspeople use technology like OnX and similar GIS based software/ apps to locate hunting and hiking opportunities, and to confirm that they are legally recreating.</p> <p>I support the departments effort to simplify hunting rules, as well as support the retention of hunting in as many areas as can be deemed safe.</p>	Support	Support of rule and hunting map
Randy Page	As long as less access is not changed I see no issues. Somehow I feel that this is exactly where this will be headed.	Support	Support of rule and hunting map
Keith Hughes	State parks need hunting as a management tool for wildlife. Fort Stevens park is a prime example where elk populations are out of control. An idea is to do a controlled application to limit harvest. Also, limiting weapons to short range such as archery only to ensure safety.	Support	Support of rule and hunting map
David O'Connor	Yes, I support the allowance of hunting where safety and wildlife management goals can be met.	Support	Support of rule and hunting map

<p>Jorge Munoz</p>	<p>I think this would be a great move to allow hunting in state parks. Hunting season is typically a colder time of the year and folks aren't really out and about recreating at that time so the safety aspect I believe would be diminished in regards to concern with firearms going off or arrows being shot. Remember, most if not all hunters in the state of Oregon have to take a Hunters Education class before even getting a hunting license. These folks know the rules and regulations when it comes to safe practices with firearms. It would also help more people learn about their state parks that they otherwise might not even know about as well as add revenue to that area with folks spending money in local establishments while going hunting. Please consider this and know it would mean a lot to the constituents of the rural places that this would ultimately affect the most. Thank you</p>	<p>Support</p>	<p>Support of rule and hunting map</p>
<p>Haley Smith</p>	<p>Hunting maps should be posted in all campgrounds as well as all cabins and yurts in State Parks where hunting is allowed. In addition, when someone books a camping site in a state park where hunting is allowed, their reservation should include a map of the hunting areas. This is for SAFETY reasons. Re La Pine State Park specifically - allowing hunting within 1-1.5 miles of the campgrounds is too close! We are having problems in Central Oregon with dogs on trails getting shot by hunters and dogs getting caught in hunters' snares. Most people who camp in La Pine State Park hike much further than 1 mile from the campgrounds. This distance should be extended to at least 5 miles.</p>	<p>Other response</p>	<p>Post hunting maps in all state parks. Extend safety zone in LaPine</p>
<p>Theodore Chu</p>	<p>I am writing to ask that you allow hunting in Cougar Valley State Park, Tillamook County. Before this land was acquired by State Parks it was a traditional local hunting area. It has not been developed in any manner which I support and hope it will remain that way. From my observation the large majority of use of this state park occurs in the summer and consists of hiking and a place where people can allow their dogs to run. In my many visits I have never encountered another user, only seen sign of visitors and dogs. Game species commonly seen include deer, elk and ruffed grouse. I don't believe the limited seasonal hunting the area might attract would create a safety hazard for other park users. Thank you for this opportunity to comment. Please give my suggestion fair consideration.</p>	<p>Other response</p>	<p>Allow hunting in Cougar Valley State Park</p>

David Stone	<p>Regarding your proposed rule to map hunting areas in state parks. I had no idea that hunting was allowed anywhere in state parks and I'm sure few people do. Park visitors expect a quiet and peaceful visit. Visitors should not be expected to search for a list and map to plan a trip to a state park. There are vast acres across the state where hunting is allowed (far more acres than in parks) that we must avoid now and it is quite a chore to try to make sense of all the complicated seasons and rules which change every year. Please ban hunting in all state parks so we can take our families to any park without worrying about getting shot. It is not reassuring that only low use parks allow hunting. Hunting in Oregon is already in decline; now is the time to at least ban hunting in all State Parks. Any new maps should show NO areas in State parks where hunting is allowed.</p>	Oppose	Ban hunting in all state parks
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<p>Dwane Williams</p>	<p>To OPRD Rules Coordinator:I am submitting a public comment in regards to proposals to amend OAR 736-010-0055 concerning updating state park resource rules to clarify hunting boundaries. My comments pertain specifically to LaPine State Park (S.P.) , which is about a 3 mile hike or bicycle ride from my residence.The OPRD needs to reject any consideration of any hunting and trapping within the boundaries of LaPine S.P. I take issue with these specific points:Under Chapter 736 of 736-010-6055 Park Resources(9) discharging of firearms is prohibited in park properties EXCEPT while hunting and trapping wildlife, under the following provisions:&nbsp;(f) Hunting is permitted with shotguns or bows and arrows only during ODFW authorized seasons in designated parks(g) Hunting shall be permitted with rifles in LaPine S.P. only during ODFW authorized seasons(ee) Hunting waterfowl is allowed in a portion of the following park boundaries- includes LaPine S.P.My reasons for rejecting any consideration of hunting and trapping are:&nbsp;&nbsp;&nbsp;(1) We and a multitude of nearby community residents and visitors to LaPine S.P. rely on hiking, bicycling, snowshoeing, cross-country skiing, horseback riding, and other forms of outdoor recreation such as fishing, within the S.P. We do these activities especially during ODFW hunting seasons for big game, and waterfowl, as a safe haven and refuge for avoiding the dangers presented by rifle and shotgun users during these hunting times. None of us had any idea that hunting would be permitted in a S.P., especially when our National Forest that surrounds our communities near LaPine S.P. provide ample opportunity for big game hunting.&nbsp;&nbsp;&nbsp;(2) Our community borders the Upper Deschutes River. Many types of outdoor recreationists, including river floaters use the river corridor and trails along it between communities. Most are unaware of 2 small sections of the river corridor that allow waterfowl hunting. These hunting boundaries are directly across from residences on the opposite side of the river. These homes have been on the receiving end of shots discharged from hunters' shotguns. Residents of these homes have been threatened by hunters, and there have been documented infractions such as illegal hunting out of bounds, trespassing on private property, trash dumping, disturbing of native trees and environment, human waste deposited, illegal hunting blinds constructed as permanent structures, and drug paraphernalia dumped.&nbsp;These and many other infractions have been documented by a local</p>	<p>Oppose</p>	<p>LaPine resident</p>
<p>Keith Hadley, PhD</p>	<p>Please find my responses to the Oregon Department of Parks and Recreation posted as&nbsp;NOTICE OFPROPOSED RULEMAKING to CHAPTER 736.The&nbsp;attached comments and concerns regarding general and specific LaPine State Park hunting boundaries and economic concerns.Thank you&nbsp;for your consideration.Keith Hadley PhD</p>	<p>Oppose</p>	<p>LaPine resident - see attachment</p>

<p>Sevilla Rhoads</p>	<p>Re: Hunting in La Pine State Park</p> <p>My family lives near this wonderful park. We often invite friends from this area and visitors to join us on walks or to camp at the park. We know many others who walk in the park year-round.</p> <p>I have two kids and we love to bird and walk all year. During hunting season, it is too dangerous to walk or snowshoe with kids in the extensive hunting areas of the Upper Deschutes.</p> <p>Last year, despite keeping to marked trails and wearing bright colors, on the few occasions we tried to hike on trails outside developments, my kids were in danger when hunters fired in our direction on several separate occasions! Due to their camouflage, we did not know the hunters were hiding in the area and the hunters did not realize we were quietly walking along enjoying the bird calls. In winter, the light can be low even in the day and kids are not easily seen by hunters even when we dress them in bright colors. Kids tend to move quickly and suddenly and they play games along the trail like hide and seek, so hunters can easily mistake them for a target suddenly appearing. Plus, there was the trash we encountered at the multiple hide sites of used ammunition, broken beer bottles, cigarette stubs, and other items that I prefer my kids not find.</p> <p>During hunting season, there are very few natural places outside developed areas in the Upper Deschutes for families to hike, bike ride, nordic ski, snowshoe, and bird safely. La Pine State Park could be a safe haven for families trying to enjoy nature safely.</p> <p>The kids and I enjoy seeing birds in this area and we have seen owls, including a rare species, in La Pine State Park during the winter courting and breeding season. We think many owls retreat to the few non-hunting areas along the upper river. La Pine State Park is a winter birding destination for this reason. The owls are active at peak hunting times.</p> <p>Owls rely on the river meadows and clearings in La Pine State Park and they have extremely sensitive hearing. We know of families traveling to this park from other areas just to see the owls there in the winter. Unfortunately, these bird-friendly clearings are also places that attract the targets sought by hunters. Families with kids quietly moving around these areas trying to see owls and view other</p>	<p>Oppose</p>	<p>LaPine resident</p>
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<p>Carolyn Hintz</p>	<p>I live in Bend. I've lived in Oregon since 2002. Having areas in state parks where hunting is allowed is extremely dangerous and unnecessary. There is plenty of land for hunting and killing beautiful creatures on other public lands. The story I heard on the news said that at LaPine State Park the hunting boundary is just 1 mile from the campground. Wow. That is pretty close to allow lethal weapons to camping. My comment: No hunting should be allowed in State Parks at all. Thank you.</p>	<p>Oppose</p>	<p>No hunting in state parks</p>
<p>Sean Coleman</p>	<p>To Whom It May Concern,</p> <p>I am inquiring about the hunting boundaries (and rule changes for hunting zones)</p> <p>On the Northern boundary of La Pine SP, along the Fall river there is current legal hunting.</p> <p>Could you please specify how or why the area has legal hunting? It seems like a no-brainer that legal hunting should be nowhere near a highly trafficked walking, hiking, fishing area.</p> <p>There are so many hunting opportunities in Oregon, why so close to a family friendly state park? We have the third highest acreage of huntable BLM in the nation, why even take a risk in state parks where families gather?</p> <p>My family member was nearly (accidentally) shot a mile behind the Cascades Lakes Welcome Station outside Bend 2 years ago. That is obviously a different area however it's a perfect example of the kind of circumstances we all want to avoid.</p> <p>Thank you for your consideration of this matter</p>	<p>Oppose</p>	<p>LaPine resident, Fall River</p>

Rick and Willee Carter	<p>Dear State Parks Management & Commission,</p> <p>We live in an area in close proximity to Lapine State Park and are concerned with the discussion being developed to establish hunting permissions in the northern range of the park property and given the fact that there are other federal (Forest Service) properties currently in proximity to the State Park and are currently utilized by hunters, the establishment of addition hunting area is not necessary. Another concern is the increased use of high-power weapons in established hunting areas and potentially now the proposed hunting area within the park.</p> <p>Secondly, the use of these high-powered weapons can have a deadly effect on individuals driving, walking and riding horses and bicycles in the proposed hunting areas, that has a wide range of dirt roads and trails, along the northern area of La Pine State Park.</p> <p>It is our opinion, that the State Parks Management and State Park Commission should reject any further discussion or consideration regarding this project.</p>	Oppose	LaPine resident
William Waugh	<p>Hunting in La Pine State Park is not safe. Two legs of the Fall River Trail goes thru the hunting area. Hundreds of local hikers, runners, horseback riders can not use the area during hunting season. Hunting needs to be banned in La Pine State Park its...</p>	Oppose	No hunting in LaPine
M Gibbons	<p>It is not good to have hunting permission anywhere near areas that people not interested in this activity go. It is noted by myself and others that too many impulsive hunters have shot at any movement of mushroom hunters and others who's safety is clearly compromised by the many irresponsible people out there with guns , anxious to shoot anything that moves. There should be no mistakes that hunting and other outdoor recreational activities do not share common understandings or values, and should have boundaries in polarity.</p>	Oppose	No hunting in state parks

Garrett Fairchild	<p>I don't see the need to cross out all of the current language that outlines areas that are accessible to hunting and replace it with "a map" that seemingly can be changed on a whim by whoever the director is at the time. Given that there would no longer be written word for what is open and what is not, it leads a person to believe there is a reason for that. Maps without written descriptions are easy to edit and shrink year by year, so, I do not think that written information should be removed from the OAR. If there is inaccurate information, edit that and that alone, while still providing a map of the most up to date information each year. Add signs and whatever is needed to "warn" the general public of the other outdoor recreation taking place in those places that are outlined in the text and on the map to be open for hunting, and continue to post signs at entrances and on the website to inform people of any sudden closures. There isn't great (or any) cell service in some of the state parks that are open to hunting, so just having an online map and doing away with the postings at the entrances is not adequate or equitable notification for all those that visit those places for recreation. This rule clarification isn't very clear, on one hand it lessens the amount of reading, but on the other hand, it opens the door to take away access to public lands that have been open to activities like hunting and trapping for as long as they have been in existence. There are enough access issues, we don't need more to be ushered in under the guise of "clarification and safety". Please keep the language the way it is. Update anything out of date, create a map of the most up to date areas each year, provide proper notice to visitors of any changes both on the website and at the entrances to keep everyone informed, and keep as much area open to public use as possible. There are plenty of areas for people to recreate that are currently closed to hunting, and those that are currently open to hunting should remain open with concise language stating exactly where those areas are.</p>	Oppose	Leave rule language as is
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January 13, 2022

Park Resources to Clarify Hunting Boundaries

Dear Rules Coordinator Kesch:

Below are my comments, clarifications, and concerns regarding the NOTICE OF PROPOSED RULEMAKING to CHAPTER 736 by the Oregon Parks and Recreation Department. These comments are consistent with the ODPR's *Need for the Rules* to "help protect visitors and hunters alike" along with some general and specific suggestions to rule changes.

Clarifications presented in the two ODPR versions greatly improved the proposed rules identifying hunting boundaries. That noted, some of the revised rules remain confusing and misleading. Specifically, the hunting rulemaking changes in some State Parks are inconsistent and fail to meet some public safety and wildlife goals. Below I clarify my comments regarding hunting safety and boundaries, and briefly respond to possible negative economic impacts of "proposed rules on business."

In general, few agency hunting boundary maps provide *accurate* or *precise* boundary information that is *easily accessible* and used by the general public. Some of the challenges in establishing meaningful hunting boundaries are related to the location, extent, adjacency and landscape complexity of public land. Where hunting boundaries are vague, they fail to meet Oregon State, County and Federal mapping criteria needed to ensure clear boundaries within and between public and private properties.

Inadequate clarification of hunting boundaries are safety issues for at least three important reasons related to proximity and adjacency: 1) those areas where public lands typically lack clear hunting demarcation in areas that experience frequent visitor use and overlap (e.g., hunting and other recreation activities), 2) the locations of residences in WUI (Wild Urban Interface) areas that contribute to hunting and shooting public/private conflicts, and 3) unsafe hunting and shooting firearm ballistics capable of crossing large areas. Hunting safety issues consequently involve several conflicting and combined conditions. These involve: a) diverse forms of recreational use, b) the proximity and adjacency of public, residential and private land ownership, and c) jurisdictional interfaces of state, county and federal government agencies.

Considering the intersection of various park users, are the boundaries sufficiently identified to park visitors to identify hunting boundaries? If defining visitor safety is the prevue of rulemaking, what are the responsibilities and level of OPRD culpability?

The Big River Safety Committee (BRSC) focusing on a short USFS hunting area of the Upper Deschutes River, has provided USFS and Deschutes County Commission substantial physical evidence of illegal hunting and shooting impacting local residences. This is germane to hunting along the Deschutes River and to in LaPine State Park and Recreation Area as clearly demonstrated by firearm ballistics. Bluntly presented, ballistic physics combined with physical evidence and law enforcement reports of legal infractions show that hunting waterfowl and large game with modern cartridges are unsafe and ballistically indefensible.

Ballistic and projectile information is readily available in published public and private sources, including gun owner and hunting organizations.

In short, hunting in state parks are unsafe when hunting boundaries, park users, residents, are compromised by ballistics. That noted, in its most basic compromise for non-shooting recreation visitors and local residence safety, I submit the following changes to your November 30, 2021 version of the proposed rule changes:

*The following hunting and shooting **are not allowed** in LaPine State Park and Recreation Area where:*

- (a) large game hunting with firearms having ballistic capable projectile distances less than **two-miles** from WUI residences in any direction*
- (b) waterfowl shooting with shotguns having ballistic capable projectiles distance less than **840 yards** of WUI residences in any direction*
- (c) firearm ballistics capable projectile distances of overlapping or crossing within **two-miles** of official recreation trails and recreation waterways*

Negative Economics Related to Hunting and Shooting Impacts

Regarding the reduction of negative economic impacts related to the rule on business, I recommend ODPH review the research and objectives of the OSU Cascades Center for Outdoor Recreation:

<https://osucascades.edu/news/new-osu-center-outdoor-recreation-economy-will-support-788-billion-us-industry>

Dated (2016) but useful information found in OSU *Recreation Use Values Database* show most forms of outdoor recreation generate far greater economic "benefit" beyond hunting and shooting.

<https://recvaluation.forestry.oregonstate.edu/database>

Economic arguments supporting hunting and shooting in visitor-active parks are further challenged questions regarding negative economic impacts and externalities. One example pertains to whether the State of Oregon abets shooting incidents. Are there economically "cost free" law suits that involve shooting injuries in Oregon State agencies and state personnel? Other states, such as California, allow court torts and compensate involving injury-related shootings on state land.

Considering arguments of what constitutes culpability or "poor decision-making," wouldn't hunting and shooting conditions have negative economic impacts on "the rule of business?" Considering LaPine State Park as an economy-related example, what metrics do ODPH consider when comparing the positive and negative demographics of general recreation users vs hunting and shooters? How will the increasing numbers recreation users play into future per capita funding of state park budgets, related to visitor access and park services in general? Do local economic entities such as Sunriver and Bend and increased housing, add (or subtract) recreation economic contributions?

Summary of Fundamental Rulemaking Points

My fundamental rulemaking points are fourfold.

First, hunting and shooting in state parks and adjacent, non-state properties, have not and cannot be demonstrably shown to be safe in ballistically compromised areas.

Second, since the 1990s, nineteen public land hunting and shooting areas in Deschutes and Jackson Counties were closed in response to changing demographic, housing, political conditions and WUI conflicts related to the dynamic changes occurring in rural and expanding residential areas.

Third, the negative economic influence of hunting and shooting in *unsafe* State Parks is tightly woven into the conditions that engulf much of the State of Oregon, demographics and a growing, asymmetrical recreation-use demand.

Fourth, current local hunting/shooting safety issues and restrictions are being derailed by the USFS that chose to ignore the closure of unsafe hunting and shooting areas based on questionable, legal interpretations of the Dingell Act. This is now being tested by other rare agencies. That noted, the State of Oregon has the authority and legal obligation to close, restrict, or open shooting and hunting safety on state property.

Thank you for considering and replying to my comments and suggestions.

Keith Hadley