From: Sillydog Farms
To: Planning Department
Subject: Rebuttal with reference to HBCU-22-001
Date: Friday, December 16, 2022 11:56:48 AM

This Message originated outside your organization.

Esteemed Comitteemembers,

I have several point to refute in the "Bandon Biota" application for an 18-hole golf course.

Firstly, my own property was incorrectly zoned in the application. It is actually RR2/RC.

Secondly, I can assure you that Leff, Nelson and Krannick lands are all in full agricultural operation at this time and for many decades prior.

Third, I have several items of contention with the text of the application. These issues are as follows:

1. "*The development and maintenance of a golfcourse is essentially a farm activity consisting of seeding, irrigating, fertilizing, and mowing specialty grasses at various lengths….There is no reason to believe that the development of a golfcourse, or the day-to-day maintenance of the course will conflict with other types of adjacentfarm uses, and specifically the production of cranberries that employs similar management practices and activities." (Application, p. 6-7).* I know for a fact that golf-course management, especially of greens on sand, is NOT equivalent to the agricultural activities that occur in THIS area. The proposed practices and water-usage would wildly impact the ability of local farmers to continue operations. The crops and practices of local growers are and have been water-conscious because the resource is finite. Bogs recycle water and pastures are mostly un-irrigated to preserve just enough water to harvest the cranberries without as little impact as possible on local residential wells, which already do see an impact at harvest time. Water-usage by said farms is seasonal, whereas golf courses pump at maximum capacity year-round to keep a non-native grass alive in sand. The local crops are water thrifty by nature, whereas turf grass is quite the opposite in such applications. (I do, however, commend the lead grounds-keeper of The Dunes for utilizing foliar-feed - that's smart horticulture.)
2. "The proposed golf course is directly adjacent to Recreation (Rec) zoned land to the west (Bandon State Park)and EFU land to the east,north and south. The State ownership to the west consists of vacant open space land. Although the park land is available for recreational use by the public, it is heavily vegetated in gorse,and therefor largely inaccessible." It is so easy to walk from those protected park lands into the former-forest (not gorse) that Bandon Biota has already knocked down, burned and bulldozed in early 2021, that I have accidentally done so several times. Bandon Biota has, in fact, allowed gorse to grow up on these properties, presumably for the purpose of arguing that is has always been that

way. It has not.

3. *"There are no nearby commercialforest practices occurring that could be impacted by the proposed golf course. The management activities associated with a golfcourse are so similar to other types of agriculturalpractices, that they can only be deemed as compatible."* Those operations, as described in Exhibit C and as practiced at The Dunes and other courses in the area, have already had a massive impact on the local farms. David Leff has had thousands of dollars of damage done to his bottom-lands by Bandon Crossings and has pursued compensation for a decade without satisfaction.
4. *"The agricultural uses (cranberry bogs) adjacent to the proposed golfcourse generally utilize surface water from the shallow water bearing zone that ranges from 4 to 25feet below the ground surface, while the test wells for the golfcourse were drilled to a depth of approximately 130 feet. This indicates that adjacent agricultural uses and the proposed golf course could potentially be utilizing water from separate water bearing zones."* That is not the aquafer they propose to use, as stated in Exhibit C - they propose to use the shallower of the two marine layers, from 55-95 feet. This water is the backup that those farms rely upon when the surface water fails. It is not renewable in the same manner, and letting the golf course use it as they propose would dry up these farms and cripple cranberry production in the area.
5. *"Based upon water rights law protecting senior water rights, the proposed golfcourse cannot, and will not, impact the viability of existing agricultural uses in the area as a result of water usage."* *Exhibit C states that the first sign of trouble is salt-water inundation, and that cannot be undone - monitoring will only alert that the worst has already happened.*
6. *"It is anticipated that the water source for irrigation and domestic use will be from deep water wells and potentially reservoirs or ponds. Any groundwater irrigation sources developed in conjunction with the golf course will require water permits through the Oregon Water Resources Department (OWRD). Water use in conjunction with the golf course will be monitored to assure that the use will not impact other water uses in the vicinity.* *My well is in this zone at 85-feet, and I practice horticulture. This will radically impact my ability to work and live here.*

Thank you for your help in this matter.

Sincerely,

Marie B. Richie
47651 Hwy. 101