



SISKIYOU CHAPTER

Native Plant Society of Oregon

*Dedicated to the enjoyment, conservation, and study
or Oregon's native vegetation*

April 9, 2014

Bureau of Land Management (Attention: Trish Lindaman)
3040 Biddle Road
Medford, OR 97504

re: Mountain of the Rogue trail system

Dear BLM Officials,

Thank you for this opportunity to comment on the proposed Mountain of the Rogue bicycle and hiking trail near the town of Rogue River, Oregon. The Siskiyou Chapter of The Native Plant Society of Oregon is a nonprofit organization with more than 130 local members dedicated to the enjoyment, conservation, and study of Oregon's native plants and habitats. We support BLM's interest in augmenting the economic and physical health of our community by providing additional mountain biking and hiking recreation opportunities in our area. However, we oppose this project as currently conceived because it is likely to adversely affect a significant population of Gentner's fritillary, a native plant species formally recognized as endangered by the U.S. Fish and Wildlife Service since 1999.

Despite the need to protect and conserve Federal listed species and their habitats, the current design calls for eliminating plant habitat from more than 13% of the proposed Gentner's fritillary management area with nearly 1 of the 7 acres to be dedicated to parking and trail tread. Additional habitat within the plant's current range would be impacted by cut banks and trailside activities.

Conservation also requires provision of a buffer area around each population for protection from neighboring activities and allowance for population shifts and expansion. The trail as proposed would eliminate an additional 1.6 to 2.4 acres of otherwise suitable habitat from the buffer zone.

Even with planned mitigation measures, invasive nonnative weeds, identified as a major threat to Gentner's fritillary, will be spread through the endangered population by trail construction and use. Being subject to available personnel and funding, long term management of these weeds may or may not happen in the years to come.

Gentner's fritillary was listed as endangered due, in part, to impacts and threats from loss and degradation of habitat, competition from invasive nonnative plants, and trail maintenance activities, each of which are expected to increase under this proposal. These impacts are likely to have long term negative consequences for the plant. For these reasons, The Siskiyou Chapter of The Native Plant Society of Oregon opposes the project as currently conceived.

With more than 4000 acres of BLM land in the project area, we would encourage alternatives be developed which avoid disturbing the sensitive 7-acre Gentner's fritillary population and its surrounding suitable habitat. Thank you.

Respectfully,

The Siskiyou Chapter of The Native Plant Society of Oregon

Contact: Pete Gonzalves, Conservation Chair
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