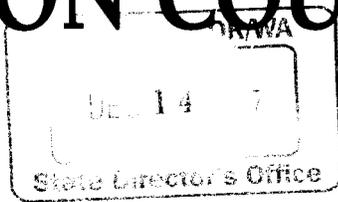




# JACKSON COUNTY

Oregon

December 11, 2007



930 Dick Prother

Board of Commissioners 1408

Dave Gilmour, MD (541) 774-6117  
Jack Walker (541) 774-6118  
Dennis CW Smith (541) 774-6119  
Fax (541) 774-6705

10 South Oakdale, Room 200  
Medford, Oregon 97501

RECEIVED

DEC 17 2007

Mr. Ed Shepard, Director  
Oregon Bureau of Land Management  
333 S.W. 1<sup>st</sup> Avenue  
Portland, Oregon 97208

Dear Mr. Shepard:

RE: Proposed BLM OHV Areas in Jackson County

The U.S. Bureau of Land Management (BLM) through the Western Oregon Plan Revision (WOPR) process is considering eight areas in Jackson County for use by Off Highway Vehicle (OHV) enthusiasts. These include Elderberry Flats, Ferris Gulch, Salt Creek, Lake Creek, Worthington/Obenchain, East Howard, Anderson Butte, and John's Peak.

As you well know, the use of OHV on public lands is extremely controversial.

Proponents view OHV use as clean family fun, and as a means of assisting people with disabilities to access remote natural regions. They also cite cleanup activities by their organizations and the fact that most OHV riders are respectful of private property, riparian zones, and off trail vegetation.

Opponents feel that OHV use on trails is incompatible with hiking and equestrian uses. They also cite noise, litter, damage to off trail and riparian vegetation by errant OHV riders, the potential of wildfires, landslides on steep slopes and the disruption of migration patterns.

In order to determine potential conflicts, Jackson County has produced maps overlaying the OHV areas under consideration with: areas of extreme wildfire risk, areas of environmental concern, "conservation opportunity areas," sensitive habitat for migratory species, areas of steep slopes (19-55%) and known landslides, ownership of private lands (both within and adjacent to the proposed areas), and fish bearing streams.

After review of the maps, the following observations and recommendations can be made:

**ELDERBERRY FLAT:**

- Extreme wildfire risk: None
- Areas of critical environmental concern: None

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- Conservation opportunity areas: None
- Sensitive wildlife habitat: Small percentage
- Steep slope: Approximately half
- Landslides: None
- Land ownership: Immediate neighbors mostly industrial forest lands with few residences
- Fish bearing streams: Area bisected by West Fork Evans Creek. Battle Creek lies outside of the proposed area to the south

RECOMMENDED FOR OHV USE. PROTECTION OF RIPARIAN ZONE OF THE WEST FORK EVANS CREEK WILL BE NEEDED.

#### **FERRIS GULCH:**

- Extreme fire risk: None
- Areas of critical environmental concern: None
- Conservation opportunity areas: None
- Wildlife habitat: Most "sensitive"
- Steep slope: Approximately half of the area
- Land ownership: With the exception of a small cluster of relatively small lots to the north, most neighbors are industrial forest lands
- Fish bearing streams: None within proposed area. Thompson Creek lies outside and to the east. Applegate River lies outside and to the north

RECOMMENDED FOR OHV USE. RESTRICTIONS WILL NEED TO BE IN PLACE TO PROTECT MIGRATORY SPECIES.

#### **LAKE CREEK:**

- Extreme fire risk: Lost Lake fire occurred within this area in 2002. Reforestation success could be impacted by errant OHV use
- Area of critical environmental concern: Lost Lake within boundary
- Conservation opportunity area: Approximately 7/8 within "Antelope Creek C.O.A."
- Wildlife habitat: All "very sensitive"
- Steep Slope: Minimal impact
- Land ownership: Most either industrial forest lands or large ranches
- Fish bearing streams: Both Lake and Lost Creeks within area. Deer Creek lies outside and to the east, Antelope Creek lies outside and to the south

NOT RECOMMENDED FOR OHV USE.

**EAST HOWARD:**

- Extreme wildfire risk: None
- Areas of critical environmental concern: Moon Prairie and Hoxie Creek lie within proposed OHV area
- Conservation opportunity areas: None
- Wildlife habitat: No “sensitive” or “very sensitive” listings
- Steep slopes: None
- Fish bearing streams: None
- Land ownership: Few adjoining small parcels or residences
- Other: Area has heavy equestrian use, the County-owned Lily Glen Barn just to the north

NOT RECOMMENDED FOR OHV USE.

**ANDERSON BUTTE:**

- Extreme wildfire risk: Western edge
- Areas of critical environmental concern: Much of the Sterling Mine Ditch and all of the large proposed Dakubetede Wild land area lie within the proposed Anderson Butte OHV area
- Conservation opportunity areas: approximately 7/8 within the “Anderson Butte C.O.A.”
- Wildlife habitat: Approximately half “very sensitive”
- Steep slopes: Almost all of the proposed area (14 known slides within 11 adjacent to the proposed OHV area)
- Land ownership: Multiple adjacent small parcels and residences to the north, west and south
- Fish streams: Griffin Creek and Coleman Creek are within and Little Applegate Creek is adjacent to the south
- Other: Historic Sterling Mine Ditch and Trail within

NOT RECOMMENDED FOR OHV USE

**JOHN’S PEAK:**

- Extreme fire risk: High-risk western, northern and eastern boundaries
- Areas of critical environmental concern: Long Gulch proposed on southern edge
- Conservation opportunity areas: None
- Wildlife habitat: Small area “sensitive”

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- Steep slope: Most, with known landslides on Foothills Creek and Forest Creek
- Land ownership: Multiple small privately-owned parcels within and adjacent, along with some industrial forest lands. Strong sentiment against OHV use by 1600+ property owners within and adjacent to area
- Fish bearing streams: Glass Creek, Jackson Creek, Forest Creek and Humbug Creek all within area

NOT RECOMMENDED FOR OHV USE

In summary, Elderberry Flat, Ferris Gulch and Salt Creek are recommended for OHV use. Lake Creek, Worthington Obenchain, East Howard, Anderson Butte, and John's Peak are not recommended for OHV use. East Howard should be designated as a wintertime snowmobile area.

Sincerely,

A handwritten signature in black ink, appearing to read "David R. Gilmour", with a long, sweeping horizontal line extending to the right.

David R. Gilmour, MD  
Jackson County Commissioner