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To: Trish Lindaman and Dennis Byrd, Medford BLM District Recreation Staff

From: Chant Thomas, local natural resource specialist

Topic: Natural Resource Values within the potential Anderson Butte OHV Emphasis Area

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1. Introduction

In its WOPR DIES, BLM has listed Anderson Butte as a potential OHV Emphasis Area of over 11,742 acres. While the criteria for choosing such areas appears to have been limited to current OHV use, a high level of important natural resource values indicate that Anderson Butte would be a poor choice for a destination OHV Emphasis Play Area. Several of these values are briefly described below.

2. Critical Deer Winter Range

Critical Deer Winter Range: According to WOPR DEIS (page 331), 11,094 acres of designated Deer Habitat Management Area, also known as Critical Deer Winter Range are within the potential 11,742-acre Anderson Butte OHV Emphasis Area. The present RMP ROD (page 48) directs BLM to "manage (these areas) with an emphasis on providing thermal cover and minimizing disturbances"; and to "restrict activities to avoid disturbance between approximately November 15 and April 1." Since most OHV activity occurs during autumn/winter/spring seasons and by nature is an activity that constitutes a major disturbance to wildlife, designation of this area as an OHV Emphasis Area would be counter-productive to its management as an important wildlife resource value.

3. Sensitive South Slopes

The proposed OHV Emphasis Area centers on Anderson Butte east to Bald Mountain, a long east-west trending ridge separating the Bear Creek watershed to the north and the Little Applegate River watershed to the south. While both the north and south slopes of this ridge contain Spotted Owl core areas that require seasonal protections, the two sides of the mountain are dramatically different. The north slopes are primarily forested and intensively roaded as a result of extensive timber harvest activities on BLM and private industrial lands. In contrast, the south slopes of Anderson Butte are characterized by roadless wildlands composed of a complex mosaic of various ecosystems. These southern slopes contain multiple natural resource values that must be examined when considering designation as an OHV Emphasis Area.

- a. Proposed Dakubetede Wilderness: This area comprises an approximately 6500 acre roadless area that was first nominated for consideration as Wilderness in 1980. This area's extensive and popular Sterling Mine Trail System, outstanding scenery, wilderness character, and unique biodiversity all make it a superlative candidate for the unique level of protection afforded by Wilderness designation. The Dakubetede is prominently featured in the book *Oregon Wild: Endangered Forest Wilderness* (see attachment) and is a unit of the proposed Siskiyou Crest Wilderness advocated by several conservation organizations. Its trail system is featured in several guidebooks to Oregon hiking trails. For some inexplicable reason the Dakubetede was not chosen by BLM in the WOPR DEIS process for inclusion in the list of lands with Wilderness Characteristics (pages 417-18, and Appendix K), even though it has a longer and more intensive level of advocacy for wilderness than other areas that were chosen. The issue of Wilderness protection

5527

for this area has made the Dakubetede Wildland a high profile and controversial area for decades. The lack of its inclusion as described above will likely be a source of critical comments on the WOPR DEIS. Meanwhile, designation of the Anderson Butte OHV Emphasis Area would be a most controversial decision, a controversy BLM would do well to avoid.

- b. Biodiversity Hot Spot: The proposed Dakubetede Wilderness discussed above comprises an unusual concentration of diverse ecosystems and biodiversity elements. Located in the rain-shadow of the Siskiyou's highest peaks, this area's arid microclimate is possibly the driest and sunniest location in western Oregon. As such contains the largest, most diverse, northern extent of California chaparral shrub communities in Oregon. It is home to the largest groves of old-growth juniper stands in western Oregon; contains the second largest populations of the listed *Frittilaria gentneri*, and the endemic *Sedum oblancoelatum*, and the only known Oregon location of a rare birch, *Betula occidentalis inopina*. The area has extensive intact native grasslands (a magnet for OHV traffic), and is noteworthy for its lack of yellow star thistle. Many, if not all, of these important biodiversity values (and the wildlife that depend on them for habitat) would be negatively impacted by increased OHV use.
- c. Sterling Mine Ditch Special Management Area (SMA): The Sterling Mine Ditch is an important cultural and historical resource that BLM has managed as an SMA in compliance with the Antiquities Act. The Sterling Mine Ditch, approximately 20 miles in length on BLM land, traverses the south slopes of the Anderson/Bald ridge. According to the present RMP ROD (page 60) and the WOPR DEIS (page 142), this SMA is closed to OHV use, a closure that would be extremely difficult to enforce if the surrounding 11,742 acres was designated an OHV Emphasis Area.
- d. Sterling Mine Ditch Trail System: This trail system has always been closed to OHV use, and as such, has been very popular with hiking, hunting, and horse enthusiasts who desire a wilderness trail experience without the user conflicts associated with motorized recreation. Because of its location in dry lower elevations, this trail system provides year-round access and is especially popular during winter months when higher elevation trails are covered with snow. The WOPR DEIS (table page 127) is in error regarding the extent of the Sterling Mine Ditch Trail system. The mileages in this trail system should read: Sterling Mine Ditch Trail (Deming Gulch to Little Applegate): 18 miles, Wolf Gap Trail: 2 miles, Bear Gulch Trail: 1 mile, Tunnel Ridge Trail: 1 mile (not 41 miles!), and Little Applegate Trail: 1 mile. The combined 23 miles of historically maintained hiking trails make this trail system second only to the Pacific Crest trail in length within the Medford District. According to the present RMP ROD (page 60) and the WOPR DEIS (page 142), most of the Sterling Mine Ditch Trail system is closed to OHV use, a closure that would be extremely difficult to enforce if the surrounding 11,742 acres was designated an OHV Emphasis Area.
- e. Other Hiking Trails: Hidden Creek and Listening Tree are short hiking trails (1 mile each according to WOPR DEIS [page 127] that have been managed as Environmental Education Areas with OHV use restricted to existing roads according to the present RMP ROD (page 58). Recreation opportunities and OHV related negative impacts are similar to those described in the Sterling Mine Trail System discussion above.

- f. **Dakubetede Wildland ACEC Proposal:** The WOPR DEIS (page 127) lists a potential 1796-acre Dakubetede Wildland ACEC located on the south slopes of Anderson Butte. Designating the surrounding several thousand acres as an OHV Emphasis Area would create negative OHV impacts to this sensitive area incongruent with adequate protection mandated as an ACEC.

4. **Other Important Locations**

- a. **Holton Creek Research Natural Area:** This is a 423-acre old-growth reserve located on the north slopes of Point Mountain. According to the present RMP ROD (page 61), this RNA is closed to OHV use, a closure that would be extremely difficult to enforce if the surrounding 11,742 acres was designated an OHV Emphasis Area.
- b. **Bald Mountain Cultural Resource:** There is an indigenous sculpture (boulder arrangement) in the grassland below the summit of Bald Mountain. OHV use is the biggest threat to the continued integrity of this important cultural resource.

5. **Existing OHV Damage on Crests**

OHV damage currently exists along most of the major crests in the potential Anderson Butte OHV Emphasis Area, including unauthorized trails cleared by OHV users. The damage ranges from an eroded hill climb on Goat Cabin Ridge to excessive use on the old crest trail that once connected the lookout towers that topped Anderson and Wagner Buttes. Unlike the areas hiking trails, the OHV trails are extensively littered with beer cans, bottles used for target practice, shotgun shells, and other trash. Through personal communication with several OHV users in the area over the years, it appears current OHV use is limited to relatively small groups of users, some of whom fear that designation of the area as an OHV Emphasis Area would bring in unwanted new users and further degrade the area. Such designation would undoubtedly lead to severe increases in all negative impacts of OHV use.

6. **User Group Conflicts**

Present BLM guidance under the RMP ROD (page 63) states: "Manage OHV use on BLM-administered land to protect natural resources, provide visitor safety, and minimize conflicts among various users." The potential Anderson Butte OHV Emphasis Area is already a long-established home to hikers, birders, hunters, horseback riders and others seeking quiet recreation; increased OHV use should not be added to the mix.

7. **ANN MOU**

Many residents of the Little and Upper Applegate areas who are concerned about BLM management have entered into a cooperative Memorandum Of Understanding (MOU) agreement with BLM to better explore possible solutions to management conflicts. This process has thus far been beneficial in addressing timber, wildlife, water quality and other issues. Designation of an Anderson Butte OHV Emphasis Area would be a big step backward in what has been a hopeful exercise for both residents and Ashland Resource Area management and staff.

8. **Summary**

On behalf of my neighbors in the Applegate, and my colleagues in the natural resource utilization and conservation communities, I urge you to use the discussions above as rationale for your internal BLM recommendation that the Anderson Butte area be removed from further consideration as potential OHV Emphasis Area in the Final EIS for WOPR.

