

## OPINIONS

## Rare plant protection and invasive species quarantine needed on BLM OHV trails

BY SUZIE SAVOIE

For 22 years, local landowners, conservationists, and concerned citizens have appealed and resisted the Medford District Bureau of Land Management's (BLM's) plans to authorize extensive off highway vehicle (OHV) use in the Middle Applegate area between Jacksonville, Ruch, and Humbug Creek. Many rural landowners are concerned about the associated trash, trespass, noise, invasive species spread, and soil erosion that occur and spread due to OHV use.

This spring the Medford District BLM gave OHV trails in the (unofficially named) Timber Mountain/John's Peak OHV Area a categorical exclusion (CX) ("categories of action that have been determined to not have a significant effect on the environment and therefore do not need to be analyzed through an EA [environmental assessment] or an EIS [environmental impact statement]": from the BLM participant guide for the National Environmental Policy Act). This CX would allow maintenance of unauthorized, user-created OHV trails in the Middle Applegate. In May 2017, four local groups—Applegate Trails Association, Applegate Neighborhood Network, Forest Creek Community Association, and the Siskiyou Chapter Native Plant Society of Oregon—appealed this ruling.

Circumventing an EA and an EIS, a CX denies public comment and does not allow for public review or input except through an appeal of the decision and a legal challenge.

Sometimes CXs are used for small projects that don't have significant environmental impacts. However, use of a CX in this case shows a blatant disregard for the significant cumulative environmental and social impacts. In

the CX document under "Categorical Exclusion Review," BLM claims that the issue is not controversial, *despite heated local controversy surrounding the issue since 1995.* (See "Note" below for link to CX.)

The CX specifically authorizes BLM to "maintain" 65 miles of OHV trails over two years. The OHV trails they seek to maintain, however, were never authorized to begin with and they were illegally created. The OHV trail creators did not seek BLM approval to build the trails, they did not build them to sustainable trail standards, and they built them without environmental review.

Continued OHV use of unauthorized, user-created trails in the CX area will irrevocably alter terrestrial habitats, hydrology, native plant communities, rare plants, wildlife habitat, and soil resources and will lead to further erosion and the spread of invasive plant species.

In some areas OHV ruts are over three feet deep, creating extensive erosion and impacts to soils and hydrology. No matter how much "maintenance" these user-created OHV trails get through the CX project, they will have lasting environmental impacts due to the inadequate design and lack of trail standards. Trail rutting and braiding will continue to occur unless BLM closes damaging trails altogether.

Because the CX avoids thorough environmental review, it is likely that adverse impacts to Gentner's fritillary (*Fritillaria gentneri*) will occur. This beautiful spring wildflower is the Applegate's favorite rare plant species and a symbol of our region. The center of the world's population of Gentner's fritillary overlaps with the CX planning area to a large extent. The flower is found in numerous locations within the CX planning area, and it is currently being

adversely impacted by unauthorized OHV trails.

BLM has not performed extensive surveys for Gentner's fritillary along the 65 miles of OHV trails they have approved for maintenance in the CX. Without knowing where these rare plants occur, BLM will be increasing the likelihood that they will be harmed by OHV use. OHVs inevitably go off-trail and create new trails, activities that will continue to impact this important species. OHV trails that currently intersect areas with populations of Gentner's fritillary have already significantly affected individual plants, population dynamics, and occupied habitat. How can BLM claim to be working to recover the rare Gentner's fritillary, but approve this CX with its likely adverse impacts?

Many noxious and invasive plant species occur within the CX area. Of acute and particular concern, however, is the recently discovered 40-acre population of shiny geranium (*Geranium lucidum*) in Forest Creek centered around Bunny Meadows. This is a new invasive species to southern Oregon. If the BLM doesn't take drastic measures to curtail the spread of shiny geranium now, this new invasive species could spread incredibly fast.

OHV trails currently pass right through shiny geranium populations within the CX area, contributing to its continued spread into other areas of the Applegate Valley. The plant has already spread to the main stem of the Applegate River. Local botanists, the Siskiyou Chapter Native Plant Society of Oregon, invasive species



Trail ruts, some over three feet deep, have been created by OHVs on unauthorized, user-created trails.

Photo: Luke Ruediger.

managers, and local Applegate community members are *all calling on the BLM to institute an immediate quarantine of the area in order to stop the spread of shiny geranium.* There should be no OHV use of any kind in this area.

The CX does not address this new noxious weed, its removal, its spread, or the implications of trail maintenance for its continued spread in the Applegate Valley.

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**Note:** Find the complete CX at [https://eplanning.blm.gov/epl-front-office/projects/nepa/77516/103691/127093/20170414\\_Middle\\_Applegate\\_ERMA\\_OHV\\_Trail\\_Maintenance\\_CX\\_FINAL.pdf](https://eplanning.blm.gov/epl-front-office/projects/nepa/77516/103691/127093/20170414_Middle_Applegate_ERMA_OHV_Trail_Maintenance_CX_FINAL.pdf)

## Your input is needed on industrial cannabis development

BY ALEXIS WOODRUFF

Blackberry season has finally come. The anticipation is over, and our waiting has come to an end. After a season of wrestling with branches and pulling thorns out of our feet, we are at last rewarded with delicious berries.

Such a sweet gift comes at a cost. Once blackberries have taken root, they're unlikely to leave. Ignore them, and they will dominate your garden. If you prune and plan for their growth, you and your berries can live in peace. This delicate balance between new growth and the established environment is taking place not only in our gardens, but in our greater community as well.

We are currently facing important decisions regarding the future of marijuana farming in southern Oregon. I think we can all agree that cannabis is here to stay and that our environmental, economic, and social landscapes continue to transform as a result of its presence.

I keep hearing the phrase, "things just aren't what they used to be." And while it's easy to focus on remembering what was, it is also important that we concentrate our energy on designing our future for the better. One of the biggest shifts we're witnessing right now is the integration of industrial-scale cannabis farming into our rural communities.

This discussion isn't just about marijuana. It's also about responsible farming practices within close-knit, rural communities. What concerns do you have about large-scale farms moving in near you? Pesticide use, noise, light leak? It is essential that we let our voices be heard quickly. Your concerns can be part of the solution. Write your county commissioners and your county planning commission to let them know what you think.

In Williams, recreational-marijuana farms on resource lands is an issue of specific concern. If you live in Williams, you can attend important upcoming town meetings organized by the Williams Town Council and Citizens' Advisory Committee (WTC/CAC). These meetings will play a key role in instituting protective standards concerning new recreational-marijuana projects on resource lands. The WTC/CAC wants your feedback. What more could we ask for?

And, if you are a Williams resident and a registered voter, you can vote in the Williams election scheduled for Monday, September 25, at the Williams Grange. Keep an eye out for more information on Jo's List, Facebook, and bulletin boards around town.

We are currently standing in our window of opportunity to contribute to the unfolding of industrial development in our community, and it is essential that we make the effort to co-create a future of which we want to be a part.

We all know that blackberry bush that teeters between friend and foe. It is purely our effort that determines the nature of our relationship with our gardens.

So let us put on our garden gloves, dust off our pruning shears, and put our gardening skills to work. It seems there is some work to be done.

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