Hannah Elliott

From:

WILKES Jessica S * ODFW < Jessica.S.Wilkes@odfw.oregon.gov>

Sent:

Friday, November 7, 2025 2:35 PM

To:

Katie McDonald

Cc:

Plan; BOWLES Jamie L * ODFW; GREGORY Sara C * ODFW; JACKLE Greg S * ODFW

Subject: Attachments: ODFW comment File No. 217-25-00233-PLNG-01 217-25-000233-plng ODFW comment_FINAL.pdf

Hi Katie,

Oregon Department of Fish and Wildlife would like to submit comments for the record concerning an application for a non-farm dwelling (File No. 217-25-00233-PLNG-01). We did not comment initially because we didn't see any red flags based on the application, however upon further discussion internally, we have some concerns over growing development in the Juniper Acres area that we'd like to talk with Crook County about. We understand that there is a hearing for this application next week on Wednesday, I am going to do my best to attend in case there are any questions ODFW can answer.

We are available for conversation if you'd like to meet! Thanks, and don't hesitate to reach out if you have any questions.

Have a good weekend,

Jessica Wilkes

Regional Habitat Biologist- Deschutes Watershed Oregon Department of Fish and Wildlife 61374 Parrell Rd Bend, OR 97702

Office: 541-388-6099 Cell: 541-640-1420 Fax: 541-388-6281

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Department of Fish and Wildlife

John Day Watershed East Region 73471 Mytinger Lane Pendleton, Oregon 97801 (541) 276-2344 FAX (541)276-4414

November 7, 2025

Katie McDonald Crook County 300 NE 3rd St. Rm 12 Prineville, OR 97754

RE: Comments on Record No. 217-25-000233 PLNG; Non-farm dwelling appeal

Dear Ms. McDonald,

Oregon Department of Fish and Wildlife (ODFW) is responding to request for comment on an appeal for a non-farm dwelling application (Record No. 217-25-000233 PLNG) located at 2901 SE Myrtlewood Lane Prineville, OR 97754. Although our comments are in response to Record No. 217-25-000233 PLNG, the following is more directed towards ODFW's general concerns regarding the increasing development footprint of Juniper Acres (EFU-JA) and fragmentation of the landscape. ODFW considers this area to contain valuable (and even irreplaceable) habitat and would like to see it be protected to the maximum extent possible from continued expansion of development.

The proposed project falls within Juniper Acres, a remote subdivision located approximately 20 miles south of Prineville. Although Juniper Acres contains a series of 10-acre lots, some of which have been developed with dwellings, Juniper Acres is recognized as Open Range (Ordinance No. 18, Amendment No. 53) and contains valuable habitat for a number of species. Juniper Acres overlaps several biological boundaries, including County Goal 5 mule deer winter range and ODFW mapped habitat for both mule deer and rocky mountain elk winter range and Priority Wildlife Connectivity Areas (PWCAs). In addition, it is near low-density sage grouse habitat (OAR 635-140-0002). Areas included within these boundaries are due to the presence of resources (e.g., forage, shelter, water) important for the survival or reproductive purposes of the species or to provide movement corridors. The conservation of these resources and habitat connectivity are crucial for the persistence of these populations.

Mapped biological boundaries are an important step towards prioritizing conservation efforts, however wildlife don't recognize jurisdictional boundary lines, and therefore it is important for land managers to manage the landscape holistically for a broad range of different species. For example, the Juniper Acres area also serves as important habitat for other species that don't have special protections (e.g., pinyon jays, jackrabbits, raptors) that are reliant upon large expanses of

undisturbed juniper/sage-steppe habitat. However, the quality of this habitat has been slowly deteriorating over the years as development continues to expand and fragment the landscape. For example, the increase in number of dwellings, fencing, traffic, disturbance and domestic animals spread throughout an expanding footprint are some of the many challenges that wildlife face. Habitat loss or displacement of wildlife due to the direct and indirect impacts from development are a major concern to ODFW in Central Oregon.

ODFW would appreciate the opportunity to have further discussions with the County on the best approach to reduce continued development of Juniper Acres and to protect these valuable habitats. In addition, ODFW understands that the County is considering updating Goal 5 wildlife overlay zones and is interested in discussing this potential proposal as well.

Thank you for this opportunity to comment.

Respectfully,

Wille

Jessica Wilkes; Acting Regional Wildlife Habitat Biologist

Cc: Jamie Bowles, Acting District Wildlife Biologist
Sara Gregory, Deschutes Watershed Manager
Greg Jackle, Acting Sage Grouse Mitigation Coordinator



