

Exhibit GGG

Darlene
Mantel



Oregon

Kate Brown, Governor

Department of Fish and Wildlife
Rogue Watershed District
1495 East Gregory Road
Central Point, OR 97502
VOICE (541) 826-8774
FAX (541) 826-8776

06/15/2015

Jay Harland
Re: UGB Expansion and Winter Range
CSA Planning Ltd.
4497 Brownridge, Suite 101
Medford, OR 97504

RECEIVED

AUG 13 2015

Planning Dept.

Dear Jay:

The intent of this letter is to describe ODFW's opinion on the portion of your client's property that is currently within winter range that they would like to include in Medford's urban growth boundary. The property is located at 5500 Hillcrest Road and identified as Township 37S Range 1W Section 26 Tax Lot 100 on the Assessor's Records of Jackson County. ODFW does not object to the inclusion of your client's land into Medford's Urban Growth Boundary, and will recommend that the parcel no longer be mapped as winter range, provided that your client completes appropriate mitigation.

Especially Sensitive Deer and Elk Winter Range in Jackson County is considered a Category 2 habitat per ODFW's mitigation policy because it is essential and limited habitat. The mitigation goal for Category 2 habitats is no net loss of habitat quantity or quality and to provide a net benefit of habitat quality or quantity, mitigation should be in-kind and in-proximity.

ODFW requests that your client:

- Acquire and suspend development rights to a piece of property at least 60 acres in size, either through direct purchase, conservation easement, or some other binding process.
- The property should have habitat components typical of winter range such as oak woodlands or wedgeleaf brush fields that would benefit from habitat improvement projects, and be located within Jackson County's Especially Sensitive Deer and Elk Winter Range.
- Complete a habitat project on the acquired parcel to provide a net benefit to deer habitat, such as thinning conifers from an oak stand or cutting, stacking, and burning a decadent wedgeleaf brush field.

ODFW will recommend that the City of Medford not approve a zone change on the portion of the property currently within winter range prior to the completion of this project. Once the development rights have been acquired and the habitat has been improved, ODFW will provide a letter recommending the property be removed from the Especially Sensitive Deer and Elk Winter Range overlay and become available for a zone change. This process is more formally detailed below.

Please call with any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "Steve Niemela". The signature is written in a cursive style with a large initial "S" and "N".

Steve Niemela
Assistant District Wildlife Biologist

WINTER RANGE/URBAN GROWTH BOUNDARY MITIGATION PROCESS

1. A mitigation site shall be proposed by the private property owner and presented to ODFW for evaluation. The site proposed shall be approximately 60 acres. The identified site shall be located within the existing Big Game Winter Range Habitat in either the Lake Creek or Grizzly habitat units. Upon request of the property owner, ODFW will provide guidance to help identify potential mitigation site characteristics desired by the Department.
2. ODFW will complete the evaluation within 45 days of receipt of a letter requesting a mitigation site evaluation. ODFW will conduct a site visit of the proposed mitigation site. ODFW will provide a letter to the property owner that determines the suitability of the proposed site to meet the mitigation requirements in this condition. The letter shall also detail the habitat restoration efforts that will be required for the site.
3. If the property owner accepts the habitat restoration recommendations in 2 above then the restoration shall be completed and the site placed under permanent conservation easement (or other acceptable legal mechanism). Any conservation easement would need to be held by a third party with experience in managing these kinds of agreements, such as the Nature Conservancy or Southern Oregon Land Conservancy.
4. If the property owner does not accept the habitat restoration recommendations, the property owner may propose an alternative site or may propose alternative restoration measures in an attempt to reach agreement on a habitat restoration plan.
5. Upon completion of the agreed upon restoration for an approved mitigation site and evidence of the recorded conservation easement (or other adequate legal mechanism), ODFW will conduct another site visit. If mitigation is adequate, ODFW will provide the property owner a letter verifying the mitigation has been completed. ODFW will provide a copy of the letter to the Jackson County Planning Department and the City of Medford Planning Department.