



Advocating for a liveable and sustainable  
Rogue Valley through responsible land use.

February 4, 2022

*By electronic mail*

Josephine County Planning Commission  
c/o James Black  
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**Re:** Request for approval for goal exception to allow for full hook-up RV sites at existing county park (Whitehorse Park) in Josephine County.

On behalf of Rogue Advocates, please accept the following statement for the record in the hearing before the Planning Commission for a Comprehensive Plan Amendment with Goal 3 exception for full hook-up RV sites at Whitehorse Park, 36-06-18, TL 1000, Josephine County. Please include me in any subsequent notice related to proceedings in this matter, notice of a decision made by the planning commission, and any subsequent final notice of decision.

**I. The process prejudiced the public's ability to participate and comment on the proposal.**

The objective of the state's goal exception process under Statewide Planning Goal 2 is to "[a]ssure that citizens and governmental units have an opportunity to participate in resolving plan conflicts while the exception is being developed and reviewed." OAR 660-004-0000(3)(a).

Josephine County Parks (JCP) received a land use approval for its expansion of Whitehorse Park on May 6, 2021, except for the portion of its request for full-service RV hookups on the site that requires the Goal 3 exception at hand. Staff Report at 1. In isolating the public's ability to comment on the goal exception from the consideration of the broader upgrades (many of which would not make sense without installation of the RV hookups covered separately in this exception hearing), the planning process has not adequately provided an opportunity for the public to resolve plan conflicts while the exception is being developed.

Additionally, notice was insufficient in that it misstated the date of notice as February 12, 2022—5 days after the actual hearing date scheduled for February 7, 2022.<sup>1</sup> This error causes confusion as to how the public can participate in the hearing process and prejudices community members' right to participate. The Planning Commission should hold the record open until February 27, 15 days from the date posted on the notice as stated on the notice.

**II. In failing to adequately address impacts to wildlife habitat and increased risks from natural hazards, JCP's proposed amendment does not comply with all applicable statewide and county goals and policies.**

<sup>1</sup> [https://www.co.josephine.or.us/SIB/files/PC%20Ntc%20Hrg\(8\).pdf](https://www.co.josephine.or.us/SIB/files/PC%20Ntc%20Hrg(8).pdf).

Josephine County Code (JCC) 19.46.040(A) requires that all comprehensive plan amendments “demonstrate compliance with all applicable statewide and County goals and policies.” JCP has failed to make this demonstration with regards to a number of state and County goals and policies.

### **A. Impacts to wildlife and wildlife habitat**

JCP’s entire analysis that the infrastructure updates to Whitehorse Park will be consistent with County Goal 7’s purpose to “preserve valuable limited resources, unique natural areas and historic features” is the unsupported statement that the updates “will maintain the natural beauty of the park while protecting the surrounding land.” Staff Report, Exh A at 6. JCP has not adequately demonstrated how adding full hook-up RV spots to the Park, which involves removing up to 348 trees and paving over significant portions of the property, will comply with County Goal 7, Policy 6 to “provide for wildlife protection.”

JCP advertises Whitehorse Park as a “treasured bird sanctuary” and a “great place for bird watchers.”<sup>2</sup> Audubon describes a “high [bird] species richness, due to the diversity of habitats in this small area” and surveyed the greatest number of species (144) at Whitehorse Park of 20 other sites surveyed in the Rogue Valley.<sup>3</sup> Historically, over 170 bird species have been recorded in Whitehorse Park.<sup>4</sup> The project proposal area is significantly wooded (hence the need for JCP to remove hundreds of trees to move forward with its plan), providing important habitat for these bird species. Granting this exception for full hook up RV spots and the associated infrastructure at Whitehorse Park will reduce populations and densities of nesting resident and migrant birds as their habitat are destroyed and fragmented for the project.

JCP has not addressed how removing significant portions of the forest canopy and fragmenting bird habitat will impact bird populations and other wildlife in the park, similarly impacting the public’s recreational enjoyment of the park as a prime birding destination. JCP has not addressed how its plan aims to mitigate impacts to sensitive bird populations and wildlife habitat, such as removing less trees or reducing the number of spaces.

### **B. Increased risks from wildfire and flooding**

JCP has failed to adequately address the increased risk from natural hazards associated with its plans at Whitehorse Park. In considering an amendment to the comprehensive plan, the applicant is required to address whether the proposed densities and types of use will increase hazard due to “existing or potential hazards (flood, wildfire, erosion).” JCC 19.46.040(C)(2); Local Goal 6; OAR 660-033-0130(19)(c)(B). The applicant must also demonstrate that the proposed use “will not significantly increase the risk from hazards to the residents of the development, the area, or the general public.” JCC 19.46.040(C)(4).

JCP has not adequately addressed the exacerbated wildfire risk caused by increased RV traffic and motorized recreational use in the area. Whitehorse Park is located in a high fire hazard area. Staff Report, Exh. B, at 7. Although JCP states that it is only increasing capacity by 6 new sites, in fact it is “converting 24 underutilized tent sites into 20 RV sites and 10 tent sites” and

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<sup>2</sup> <https://www.co.josephine.or.us/whitehorse>

<sup>3</sup> <https://www.audubon.org/important-bird-areas/whitehorse-county-park>

<sup>4</sup> <https://www.audubon.org/important-bird-areas/whitehorse-county-park>

upgrading sites to “accommodate modern RVs.” Staff Report, Exh A at 4. This will represent a significant change in traffic and usage of the site, including the presence of more highly flammable propane gas, and JCP has downplayed this change and not explained how the increased RV traveler traffic will not significantly increase the risk from wildfire to the surrounding area and its residents. The wildfire risk in the area is further exacerbated by the presence of another private 40-spot RV park directly to the east of Whitehorse Park.

Similarly, JCP has failed to adequately address the risks to the federally and state protected Rogue River associated with dramatically changing the nature of the use of the park to heavily cater towards RV use. Whitehorse Park is located in a flood hazard area and is graded towards the river. Staff Report, Exh B, at 7. JCP has not addressed how the land is suitable for its proposed density of RV traffic, and associated toxic fluids, in an area subject to flooding and stormwater drainage that is a 1/4 mile from the protected Rogue River.

### **III. Climate policy considerations**

Considering the already adverse consequences of climate change in our region, including wildfire, drought, and habitat loss, causing further harm to already stressed natural systems for the sake of travel heavily dependent on fossil fuels is a short-sighted policy decision. The community needs policy and planning that accounts for the ongoing impacts of climate change in this region. The community needs its decision makers and planning staff to fully consider climate change and the resulting need for habitat protection at every point in the decision-making process for all development, especially development on public property supposedly for the benefit of the public. This proposal simply fails to meet this evident and growing public need.

### **Conclusion**

The Planning Commission should not recommend approval of the application considering JCP’s failure to adequately address impacts to wildlife habitat and increased risks associated with the proposed use and therefore failure to demonstrate compliance with all state and local goals.

Additionally, the Planning Commission should hold the record open until February 24, 2022 to correct the prejudicial error on its notice for the land use hearing.



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Rogue Advocates