



Kevin COOK <kevin.c.cook@multco.us>

Letters and background for Metro's North Tualatin Mountains application

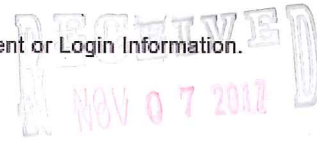
1 message

Carol Chesarek <ccaux@earthlink.net>
To: Kevin COOK <kevin.c.cook@multco.us>

Tue, Nov 7, 2017 at 10:16 AM



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Hi Kevin,

Here are the three letters from amphibian experts about the Burlington Creek site. Char Corkran is the author of Amphibians of Oregon Washington & British Columbia (2 editions). Sue Beilke is a professional biologist. The third letter is from ODFW.

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At the pre-app meeting, a Metro representative said that they had decided how many miles of trails should be in the Burlington site based on the need to create a good site for mountain bike riders to ride for two to three hours. That means the decision did not start with a careful analysis of what the site could support without harming the environment and local wildlife, but instead what they wanted to create there. Unfortunately, the high trail density could harm the state-listed Northern Red-legged frogs who need to migrate through the site twice a year, a documented wildlife corridor. The frogs like to move along creeks, but their movements are not by any means limited to narrow creek corridors. Outside breeding season, they live in upland areas (I've seen them on my front porch), so they aren't limited to creeks but creeks are particularly important.

Metro recently released a report summarizing studies of recreation impacts on natural areas ecology and wildlife. It is long, but there is a summary at the beginning plus a summary of key points at the end of each chapter. It highlights and describes the different types of impacts that trails and trail use result in. It seems like a key question will be whether some of the new trails would be a "conflicting use" in significant fish and wildlife habitat and wildlife corridors (Comp Plan policy 5.27).

<http://www.oregonmetro.gov/sites/default/files/Metro-Recreation-Ecology-Literature-Review.pdf>

Metro and folks from the mountain biking community spoke of creating a site at Burlington Creek with a good number of trail miles for mountain bikers close to Portland to save their growing community from driving to Sandy or Stubb Stewart. Metro has proposed a significant number of new trail miles designed to be suitable and attractive for mountain biking at Burlington Creek. So if this site will be highly attractive for mountain biking, they will need adequate parking to accommodate those visitors because adjacent roads do not have safe vehicle parking on their shoulder. Parking on road shoulders in this area is dangerous for individuals who park, anyone walking or cycling on the road, further discourages/endangers wildlife crossing or moving along the sides of the road, and is likely to create erosion as well as leaving additional vehicle fluids and heavy metals from brake pads along the roadside.

Metro's preliminary plan included 15 to 20 parking spaces at the Burlington Creek site.

On Saturday, October 28, 2017, I counted cars parked at several Forest Park trailheads. At 3:45 PM, when many people were heading home, there were still 17 cars parked at the Wildwood trailhead on Germantown Road (about a quarter on the road shoulder, the rest in lots). There were 29 cars parked at the Leif Erickson trailhead on Germantown Road, about a third of those were parked on the road shoulder. Leif is open to cycling. At 4PM, there were 46 cars parked at the Upper Macleay trailhead on Cornell Road, including cars in Portland Parks lots and along the road up to Portland Audubon. About a quarter of these were parked on the road shoulders. This number does not include cars parked in the Audubon and Metro lots nearby. I've been told by reliable sources that large numbers of cars parking on Newberry Road at the northern end of the Wildwood Trail are a real problem in summer.

It seems to me that there is a mismatch between the number of parking spaces Metro has planned and the highly attractive site they've planned for mountain biking.

Metro's new plan for their Chehalem Mountain site includes parking for about 70 cars, with 3 miles of trail plus a picnic/gathering area.

Recreation in Forest Park has exploded in the last 10 years, and will continue to grow as the region's population grows. There is no nearby bus service to the North Tualatin Mountains sites, and adjacent roads, I think, will not be attractive for riding mountain bikes to the sites, so most riders will arrive in cars.

Let me know if you have any questions.

Exhibit D.2

Best,

Carol

3 attachments



Corkran comments N Tual. Mtns Forests plans 111615.pdf
1841K



Burlington Creek Letter to Metro signed Beilke 11.2015.pdf
49K



ODFW Feb 26 2016 comment letter Metro NTMNA.pdf
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BY: _____

President Tom Hughes and Metro Council Members
Metro Council
600 NE Grand Ave.
Portland, OR 97232

November 14, 2015

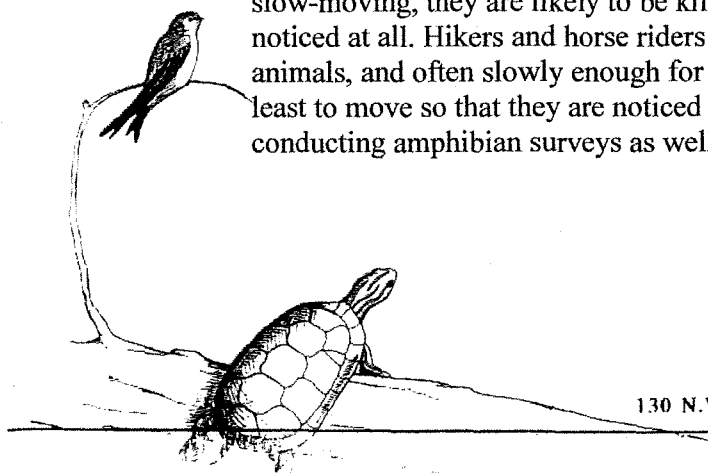
Dear President Hughes and Council Members,

Thank you for the opportunity to comment on the Recommended Alternative for the North Tualatin Mountains Natural Area. I recognize that you have a difficult job balancing your commitment to protect natural values with the desires of the public to use Metro lands for various types of recreation. In my opinion the underlying basis for making your decisions must always be sustainability of the natural areas over the long term, with particular importance on maintenance of both soil and water quality.

In general the draft plans seem too heavily focused on providing access, especially for bicycles. While I commend the Metro planners for keeping the Ennis Creek and North Abby Creek Forests as predominantly natural with no planned new public access routes yet, there are too many new trails added to the multi-use roads planned in the McCarthy Creek and especially the Burlington Creek Forests. Although I would be hesitant to plan for bikes and horses to share travel ways, the existing gravel roads are already wide and can accommodate both bikes and horses if their riders are sensible and responsible. These existing gravel roads should be sufficient routes for recreationists.

Building off-road trails, especially on the steep slopes of the Burlington Creek Forest, could compromise protection of soil and water quality from erosion, but would definitely sacrifice the integrity of these natural areas by slicing them into more narrow sections of refugia for wildlife. Particularly in light of changing climate and weather patterns, it is essential to maintain both large blocks of undisturbed natural vegetation and corridors to accommodate the seasonal movements and changing habitat needs of all wildlife. Critical to any ecosystem maintenance is the protection of stream headwaters. Although McCarthy and Burlington Creeks are small, they are extremely important to protect. New trails for any type of recreation should not be planned to cross them, or if planned should include bridges in order to not disturb streambanks or the ability of wildlife to utilize streambanks for travel ways.

Elk and other large mammals might be able to adjust to a few new trails, but are more likely to move out of these habitat sections, especially with trails for fast-moving bikes. Small animals, particularly amphibians and reptiles, are less able to move long distances. Because some are also slow-moving, they are likely to be killed by bikers or runners without being noticed at all. Hikers and horse riders move slowly enough to notice these animals, and often slowly enough for these wildlife to move out of the way or at least to move so that they are noticed before being trampled. In many years of conducting amphibian surveys as well as hiking and riding horses on a variety of



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Wildlife Consultant

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trails, I have never found amphibians killed by hikers or horses, but occasionally by bikes. This is only anecdotal evidence and not research. But it is logical that the velocity of recreationists is a key issue in minimizing conflicts with wildlife. Speed has no place in a natural area.

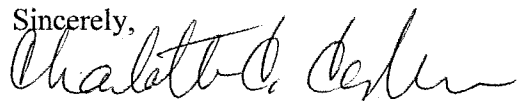
The wildlife surveys that have been conducted on the North Tualatin Mountains Forest Sites, while excellent, are incomplete. Additional, less common species could be found in the other Forests. Especially if the Burlington Creek Forest is to be considered for any additional public access, there should be surveys for all types of wildlife and assessments of the potential impacts of any planned trails, roads, or parking areas.

Even if all the wildlife species that occur in the North Tualatin Mountains Forest Sites are common to the region, they need large blocks of good habitat to persist in the face of continuing human development and activity. Climate change and emerging infectious diseases are currently threatening even the most abundant species of amphibians, bats, invertebrates, and other types of wildlife. Protecting significant habitat acreages where healthy, breeding populations of common species occur will give them the best possible chance to adapt or evolve to withstand changing conditions. For instance, Metro's surveys of the McCarthy Creek Forest found large numbers of Western Red-backed Salamander (*Plethodon vehiculum*) including juveniles. Where it does occur, this species is very common, but the number of sites where it persists in the Portland area is quite limited, giving particular importance to any large habitat area with a healthy, breeding population.

The Northern Red-legged Frog (*Rana aurora*) is known to occur in some of the Metro Forests and undoubtedly does occur on all of them. It is a traveler that requires wetlands for breeding and tadpole development but also upland habitats for adults for year-round foraging. Conifer forests provide that habitat, but only if there are streams or springs for surviving periods of heat and cold. The North Tualatin Mountains Forests provide the upland habitat for the population of Northern Red-legged Frog that breeds in the wetlands at Burlington Bottom and adjacent areas. The Metro Forests also provide corridors along the streams for seasonal migrations, as well as connections to other populations to both the north and the west. Maintaining these connections will be increasingly important. Moreover, there is an opportunity for Metro to assist in building underpasses for these frogs where they often are killed by motor vehicles while crossing Highway 30 in migrating to and from the wetland breeding habitats along the Multnomah Channel. But, at the least, not building new trails that dissect forest habitat and disturb streams would maintain habitat for this important population.

Please revise the Recommended Alternative for the North Tualatin Mountains Natural Area. Utilizing existing gravel roads to provide access for recreation is sufficient without building additional trails that would compromise soil and water quality and wildlife habitat values of these superb natural area sites. Thank you for considering these comments in your deliberations.

Sincerely,



Charlotte C. Corkran, Wildlife Consultant

November 23, 2015

TO: Metro Council

RE: Planning Alternatives for the North Tualatin Mountains Natural Areas; Ennis Creek, McCarthy Creek, Burlington Creek and North Abbey

Dear President Hughes and Councilors,

The four natural areas in the North Tualatin Mountains that are currently under planning offer important habitats for a wide range of wildlife including elk, coyote, owls, migratory songbirds, reptiles and amphibians. These areas were specifically purchased to protect and conserve habitats and wildlife that are unique and vanishing rapidly in our region. Of particular concern and importance are the amphibians including the Northern Red-legged frog, which is an Oregon State listed Sensitive-Vulnerable species because of declining populations, habitat loss and a number of other factors.

In February, 2015, I and several other volunteers with the Harborton Frog Project, found Red-legged frogs crossing Highway 30 by the hundreds below the Tualatin Mountains. Many of the frogs were dead, killed by cars trying to cross the busy highway, and many were females on their way to the wetlands to lay their eggs on their yearly migration. We also found Northwestern and Long-toed Salamanders trying to cross from the mountains to the wetlands.

These migrations of amphibians have occurred for thousands of years here in the Northwest, and are a crucial part of the life cycle of these vanishing animals. Once numbering in the millions and very abundant everywhere, amphibians are now gone from many areas, due to habitat loss and other factors. What we discovered on that night in February was an amazing journey that these vulnerable creatures make, moving down from the Tualatin Mountains to the wetlands below, and in this particular area, they were coming from Burlington Creek Natural Area, using the creeks on the site for their migration corridors to the wetlands.

Sites such as Burlington Creek provide crucial habitat for not only the Red-legged frog, but also the Pacific chorus frog, Northwestern and Long-toed salamanders, and Rough-skinned newt. These amphibians go to the wetlands to breed, but they spend most of their life in the forests above, relying on the upland forests for food, cover, and shelter throughout the seasons.

When the natural areas bond measure passed in 2006, the understanding was that sites such as Burlington Creek would be protected for habitat, wildlife, water quality and could provide some low impact, quiet, non-invasive nature related activities such as bird watching and hiking on the existing old logging roads.

The current Recommended Alternative for Burlington Creek, with its conglomeration of so many planned new trails going everywhere, leaving no area untouched, would result in huge, negative LONG TERM, LASTING impacts to wildlife and habitat and would NOT result in protection and conservation of these natural areas. Rather, it would:

- fragment existing habitat that is trying to heal from past logging operations;
- result in multiple crossings of all the creeks, leading to erosion and negative impacts to water quality;
- multiple creek crossings would sever the crucial migration corridors that all the creeks provide not only for amphibians but also many other species including birds and mammals;
- multiple creek crossing would sever important, crucial dispersal corridors for wildlife;
- new trails would open up currently closed canopy forests resulting in introduction of predators to areas previously not accessible;
- new trails would open up areas in closed canopy forested habitat and change the existing microhabitats in those areas that are crucial to maintain for wildlife, in particular amphibians, which need and depend on cool, moist habitats to survive;
- new trails would result in a huge increase in humans and an increase in disturbance, in particular increasing noise and noise levels, which can displace wildlife, disrupt breeding activity, disrupt migration, and much more.

As a member of the North Tualatin Mountains Wildlife Alliance, I and many others have a vision for the Burlington Creek site as well as the other natural areas in the North Tualatin Mountains. This vision includes the following:

- First and foremost, these areas must be protected and conserved for the habitats and wildlife that live there or that may be there in the future. Real protection and conservation can only happen IF:
 - Human use of the area is low impact and minimal so that potential impacts are also minimal. We envision using the existing logging roads as hiking trails with no new trails.
 - No new crossings of creeks should occur in order to AVOID all of the potential negative impacts (listed above).
 - Prior to any planning, surveys for wildlife should be conducted in order to better understand what species are present or could be present on the site, and how to best protect and conserve these species. To start, we recommend surveying for amphibians, breeding birds, owls, and some species of mammals. Citizens can help and many of the neighbors of these sites have a great knowledge of what species use the areas and when, such as the resident elk herd. We should be talking to them and listening as they care greatly about the wildlife and habitat in the Tualatin Mountains.

We already know Red-legged frogs are on the site, and by knowing this, we need to be much more careful and considerate of this area. These frogs are a vanishing species, and like frogs

around the world are disappearing at enormous rates. We are the caretakers of this land and these amazing species and we don't want the frogs and other wildlife to disappear from Burlington Creek due to too much human intrusion. Please join us in our effort to protect the frogs and all other wildlife and their home at Burlington Creek as well as the other three natural areas in the North Tualatin Mountains.

Thank you very much for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Sue Beilke". The signature is written in dark ink and is positioned above the printed name and address.

Sue Beilke
Wildlife biologist and frog researcher
11755 SW 114th Place
Tigard, OR 97223



Oregon

Kate Brown, Governor

Department of Fish and Wildlife

West Region
17330 SE Evelyn Street
Clackamas, OR 97015
Phone: 971-673-6000
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February 26, 2016



Olena Turula
Metro
600 NE Grand Avenue
Portland, OR 97323

Re: ODFW Comments on Tualatin Mountains Natural Area Metro's Recommended Alternative

Dear Ms. Turula,

Thank you for the opportunity to provide input on the future management of the Tualatin Mountains Natural Area (TMNA), specifically Metro's proposed Recommended Alternative affecting the Burlington Creek Forest, Ennis Creek Forest, McCarthy Creek Forest, and North Abbey Creek Forest properties. The Oregon Department of Fish and Wildlife (ODFW) recognizes Metro secured the properties as a result of voter-approved bond measures and is tasked with protection and conservation of natural resource values while providing some level of recreation and other public use benefits. In accordance to our mission and authorities, ODFW has reviewed Metro's current proposal for the TMNA and offers the following comments and recommendations:

Comments:

Habitat loss, degradation, and fragmentation is the primary threat to Oregon's fish and wildlife. Invasive species, degradation of water quality, barriers to movement, and anthropogenic caused disturbances and hazards are additional challenges. Trails fragment habitat, are vectors for invasive species, and can increase sedimentation, negatively affect water quality. While there are benefits to providing access to nature, human presence and recreational trail development can have adverse effects on wildlife by increasing stress/reducing fitness, disrupting breeding and foraging behaviors, and increasing risk of direct mortality and illegal collection. Amphibians are particularly sensitive to changes in micro-habitat conditions and vulnerable to direct mortality and illegal collection. It has been documented that amphibians can get trapped in ruts created by off-road bike tire tracks, causing them to get run over or making them more vulnerable to predation and illegal collection.

All four TMNA properties lie within Oregon Conservation Strategy (OCS) Conservation Opportunity Areas and provide fish and wildlife resource values of interest to ODFW. The Burlington Creek Forest (BCF) tract is of particular interest to ODFW because of its proximity to the 417-acre Palensky (a.k.a. Burlington Bottoms) Wildlife Mitigation Area managed by ODFW. Palensky provides important habitat for a variety of wildlife species include migratory songbirds,



waterfowl, pond-breeding amphibians, and native turtles. Red-legged frog are a target wildlife species and are monitored annually as part of the mitigation plan for the Palensky Wildlife Mitigation Area. Even though separated by Highway 30 and Burlington Northern railroad lines, seasonal movements of native amphibians including red-legged frog have been well documented between Palensky and the BCF tract. Movements are considered significant and predictable based on observations of live and dead animals recorded since acquisition of the Palensky site in 1991. It appears that the BCF tract provides important foraging and over-wintering habitat for amphibians breeding at Palensky, in particular red-legged frogs. For example, during a 20-minute period on one night in 2014, 46 red-legged frogs and 3 northwestern salamanders were observed crossing Highway 30 during a heavy rain event. This count was made standing opposite Burlington Creek (Beilke pers. comm. 2015). At the same location in 2015, 140 red-legged frogs were observed moving from BCF to Palensky during a single survey period. Red-legged frogs are on Oregon's Sensitive Species List (ODFW 2008), are classified as "Nongame Wildlife Protected" (OAR 635-044), and are Strategy Species in the OCS (ODFW 2006, 2016 *under review*)

ODFW is concerned that proposed trail development in BCF may negatively affect red-legged frogs and other native amphibians that regularly move between Palensky and BCF. ODFW is also concerned trail development on the generally steep slopes of the BCF tract may result in increased soil erosion and sedimentation into Burlington Creek and the numerous seeps, springs and unnamed tributaries present on the property. While ODFW expects wildlife in general to benefit over the long-term from Metro's planned forest management prescriptions aimed at increasing tree growth and developing mature / late-successional conifer forest characteristics (e.g., multi-layer tree canopy, snags and down wood), we are unsure if these actions will off-set negative effects likely to result from trail development (e.g., habitat fragmentation) and resulting increased human presence (e.g., disturbance).

Recommendations:

1. Avoid / Minimize construction of new trails and other infrastructure, especially in areas of high quality habitat. Utilize existing roads, trails and other right-of-ways (e.g., power-line corridors) whenever possible to reduce additional habitat fragmentation. Minimize the extent (length and width) of new trail and road.
2. Site new trails and other infrastructure away from streams, including headwater streams (perennial or intermittent). Recommended buffer widths are to be developed on a site specific basis and depend upon site characteristics (e.g., soil, topography), but generally ODFW recommends trails be sited at least 100 m from the 100-year OHW mark of streams, including intermittent and non-fish bearing streams.
3. Avoid / Minimize stream crossings by trails and roads. When crossing streams, use bridges or other designs that do not constrain the stream channel or impede fish and wildlife movement. Consider climate change in crossing designs.

4. Improve existing trails and stream crossings as necessary to improve/protect stream flow and riparian area function, water quality, and fish and wildlife movement. Decommission trails and roads whenever possible.
5. Select trail designs that minimize soil erosion and trail rutting, discourage access / use by amphibians and reptiles, and/or allow wildlife movement underneath trails at designated locations.
6. Implement seasonal trail closures to protect priority wildlife species, e.g., during the peak of amphibian activity (breeding season).
7. Survey / Monitor wildlife presence and habitat use patterns to inform trail siting, habitat management practices, and management of public access (e.g., possible seasonal trail closures).
8. Avoid and minimize direct mortality of fish and wildlife species present at the time of project construction, in particular species or age classes thereof that are not able readily move out of harm's way (e.g., amphibian larvae, aestivating turtles, nestling birds). Conduct vegetation management with wildlife in mind (e.g., nesting birds). Use exclusion techniques to keep wildlife out of active work zones. Conduct preconstruction wildlife surveys to locate wildlife. Note: an ODFW Fish Salvage Permit and/or an ODFW Wildlife CHTR Permit may be needed to facilitate avoidance / minimization of direct mortality to fish and wildlife that may be present.

We appreciate the opportunity to review Metro's proposed plans for the Tualatin Mountain Natural Area. If you have any questions or need additional information regarding ODFW's comments or recommendations above please contact me at susan.p.barnes@state.or.us or (971) 673-6010.

Sincerely,



Susan P. Barnes
Regional Conservation Biologist
West Region

Cc: ODFW (Don VandeBergh, Tom Murtagh, Mark Nebeker, Sue Beilke)