

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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**Exhibit D.108.4**

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,

A handwritten signature in dark ink, appearing to read "Charlotte C. Corkran". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Charlotte C. Corkran, Wildlife Consultant