

Multnomah County Commissioners

RE: Burlington Creek Forest Natural Surface Trails Project

To whom it may concern:

I am writing in regard to the Burlington Creek Forest (BCF) site owned by Metro and the proposed development of many new trails, stream crossing and other features/structures on the site. My comments below are as a private citizen who as a wildlife biologist, has spent much of the past 30 years conducting surveys and research and restoring habitats for our native flora and fauna found in this region. In particular, a great deal of my focus for the past 20 years, working on both federal, state and private lands, has been to help protect and conserve a number of amphibian and reptile species that are declining due to habitat loss, fragmentation, invasive species and other factors. Species that my work has focused on include the Northern Red-legged frog, the Spotted owl, and the Western painted and pond turtles.

As a founding member of the Harborton Frog Project, started in 2013 and located near the community of Linnton, I set up the survey protocol and data collection, and worked with various local groups and agencies to make this project a success. We are now in the 5th year of this project and currently I continue to work with other frog team leaders and over 50 volunteers to help move and save the imperiled Red-legged frog, as well as several other species of pond-breeding amphibians that move from the forest on the Tualatin Mountains to the wetlands on the lowland side of Highway 30 to get to their breeding habitat. Each year we move an estimated 600-900 Red-legged frogs as well as other tree frogs and salamanders that otherwise would be killed on the highway as they try to get to the wetlands. Our current partners for the Harborton Frog Project include The Forest Park Conservancy, ODFW, and the Oregon Wildlife Foundation.

The BFC is an important natural area and is home to a diverse mix of native flora and fauna including elk, deer, bobcat, owls, bats, amphibians and reptiles. I have hiked the BFC using the old logging road, but have also gone off trail several times to inspect various plant species and look for amphibians. What I have found is that

the slopes on this site are very steep and unstable, and in fact contain some of the most unstable slopes and soils in the region. The Tualatin Mountains are prone to landslides every year, which is something that I have witnessed on a yearly basis. In addition, the BFC contains Burlington Creek as well as several other smaller ephemeral streams. When one hikes this area, you can observe all the many steep drainages that occur here and that creating new trails, whether for walking or biking, would seriously compromise and damage this very sensitive area. The streams are all used by wildlife for not only sources of food and water but also act as migration corridors for species including the Red-legged frog. The frogs and other species move along these corridors both during the day and at night to forage, to get to overwintering sites and to get to the wetlands below at the Burlington Bottoms site. One day when I attempted to go down slope in the BFC to inspect a small draw and look for frogs, I slid for about ten feet and realized that this steep, unstable slope was not a good place to be and could not take even the impact of just one person being there which resulted in disturbance of not only the soils but also of the plants in the area. So I got back on the old logging road and continued my exploration of the area but stayed on the road, knowing I would not do any damage or disturbance to plants or wildlife if I stayed on this road.

The many streams on the BCF all drain into the Burlington Bottoms (BB) site, which is a federal mitigation site owned by the Bonneville Power Administration (BPA). Stream flow from the BCF supplies important cold, clear water to BB, which support a very diverse mix of riparian and wetland habitats and which is home to many species of fish and wildlife, including both State and Federal listed species, including ESA listed salmonids and the Red-legged frog, and Western painted and pond turtles. In addition, stream flows from the BCF also connect to the McCarthy Creek, which is a perennial stream that has been documented to have ESA listed adult and juvenile Chinook and Coho salmon as well as cutthroat trout. Building of new trails in the BCF could jeopardize the health of this perennial stream and the listed fish through increased runoff and siltation due to the unstable slopes and soils on the BCF.

The Old Growth Grove in this area is a protected Bald Eagle nesting and roosting area and as such should not be disturbed. Creating new trails in the BFC would only encourage access to this site which could cause the eagles to abandon their nest site and leave.

The Metro plan for the BCF includes many new trails for both hiking, horseback riding and biking. I do not support the building of new trails in the BCF for a number of reasons including those listed above. This site is **extremely sensitive** for a number of reasons including:

- the fact that it has extremely steep and unstable slopes which if disturbed by the building of trails, will result in slope destabilization, degradation of streams, and siltation of the streams;
- the site provides habitat for a number of state listed species including the Red-legged frog (RLF) and the Western pond turtle (WPT). The RLF uses the BCF for ALL life requirements including active season habitat, overwintering habitat, and foraging. In addition, the RFL moves through the forest during the breeding season (November – March), as it makes its way down to the wetlands along the Multnomah Channel. Building trails, and having multiple streams crossings on this site would cause both short and long term damage to the habitat as well as disruptions to the movements of this imperiled species and could cause the frog to attempt to move to other sites, thereby causing possible even more harm if the frog has to move across roads where it is killed by cars.
 - The WPT is a state listed species but is also currently petitioned to be Federally listed due to the decline in population across Oregon. The pond turtle was observed attempting to cross Highway 30 from BB and move to the BCF in the fall of 2016. Pond turtles will use upland forests such as the BCF extensively and for much of the year for overwintering and for estivation habitat. Similar to the RLF, any building of new trails, stream crossings, etc. in the forest could result in a great deal of both short and long term disturbance and negative impacts, further jeopardizing the conservation of this imperiled turtle.
- The BCF as mentioned above, provides migration corridors for many species including the RFL and the WPT. The current plan for trails in the BCF includes the AA-Nature Loop, which would go directly through and disrupt the movement of the frogs to their breeding site. I have observed and documented that the frogs move through this area to get to their breeding habitat in the wetlands at BB. As discussed by Susan Barnes of ODFW in her comments on this nature loop, she also pointed out that this

loop trail would go through their migration corridor and could disrupt the terrestrial movements of the frogs and other species including elk, which have been observed at BB.

In conclusion, I hope that this wonderful, diverse Burlington Creek Forest is preserved as is, the current old logging road is sufficient to provide access for walking, for observing wildlife and for just being out in nature and appreciating the beauty of this amazing area. The entire forest was logged back in the 1980's and is still recovering and any new trails, stream crossings, etc. would only serve to disrupt the healing process the forest is undergoing and just as importantly, would result in severe and long term negative impacts to many species of wildlife including nesting birds, mammals, and as mentioned above, the imperiled Red-legged frog and Western pond turtle.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Sue Beilke

Wildlife biologist, frog and turtle researcher

