

BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF MULTNOMAH COUNTY, OREGON

WHEREAS, The West Hills Rural Area is a key part of a larger ecosystem with significant wildlife habitat values which includes Forest Park within the City of Portland and natural areas in Columbia and Washington Counties, eventually connecting with

the Oregon Coast range; and

WHEREAS, Three of the four West Hills subareas, the Northern Forested Area, the Western Agricultural Area, and the Balch Creek Area, are important parts of this larger ecosystem; and

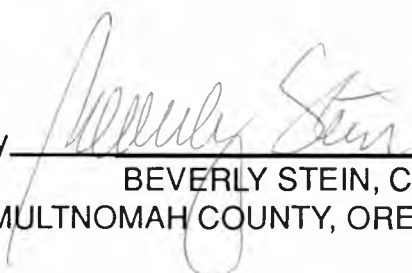
WHEREAS, the fourth West Hills subarea, the Bonny Slope area, can be further subdivided, the northern portion of the subarea consisting of mixed agricultural and forested areas with some wildlife habitat values, and the southern portion of the subarea, consisting of the Bonny Slope subdivision, consisting of rural residential uses with minimal wildlife habitat value;


THEREFORE BE IT RESOLVED, that the Multnomah County Board of Commissioners directs the Planning and Development Division staff to determine whether conflicting uses to wildlife habitat exist in the three areas recommended for designation as significant wildlife habitat in the West Hills, prepare an ESEE analysis of conflicting uses, consider and, if appropriate, prepare a program for protection of wildlife habitat resources, and undertake any other necessary actions pursuant to Oregon Statewide Planning Program Goal 5 Natural Resources as outlined in Oregon Administrative Rule Chapter 660 Division 16.

BE IT FURTHER RESOLVED, that the Multnomah County Board of Commissioners indicates its intent, at the completion of the remaining steps in the inventory and consideration of Oregon Statewide Planning Goal 5 as outlined in Oregon Administrative Rule Chapter 660 Division 16, to designate wildlife habitat as a significant natural resource for those portions of the West Hills Rural Area as shown on the attached map labeled "Exhibit 4," which modifies the Planning Commission recommendation to include that portion of the Bonny Slope subarea which is north of the Bonny Slope subdivision as significant wildlife habitat.

ADOPTED this 12th day of October, 1993.



By 
BEVERLY STEIN, CHAIR
MULTNOMAH COUNTY, OREGON


Laurence Kressel, County Counsel
of Multnomah County, Oregon



DEPARTMENT OF ENVIRONMENTAL SERVICES
DIVISION OF PLANNING AND DEVELOPMENT
2115 SE MORRISON STREET
PORTLAND, OREGON 97214 (503) 248-3043

REVISED PURSUANT TO OCT. 12 BOARD ACTION
(additions underlined)

C 4-93

STAFF REPORT

For October 12, 1993 Board of County Commissioners Hearing

WEST HILLS WILDLIFE HABITAT AREA
DETERMINATION OF SIGNIFICANCE

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II. BACKGROUND

PERIODIC REVIEW ORDER

Multnomah County's Periodic Review Order was reviewed by the Land Conservation and Development Commission on April 23, 1993. The Commission found that amendments to the County's land use regulations are required in order to comply with Statewide Planning Goals (Remand Order 93-RA-876). The county had designated "Wildlife Habitat and Travel Corridor" as a "1-B" (delay Goal 5) resource and indicated that resource identification and a protection program would be completed by the end of 1991. While a wildlife study was commissioned and completed, the County has not yet made a determination of significance pursuant to Goal 5. Consequently the County must now determine the extent and significance of wildlife habitat in the West Hills. If a resource is not significant, it is designated 1A and no further action is required. If information on location, quantity, and quality indicate that the resource is significant, the County must include it in the Comprehensive Plan inventory, and complete the Goal 5 process (ESEE analysis and protection program).

PLANNING COMMISSION RECOMMENDATION

The Planning Commission held a public hearing on the significance of wildlife habitat in the West Hills on July 26, 1993, and considered additional written testimony up until September 3, 1993. On September 7, 1993, the Planning Commission voted 6 to 0 with 1 abstention and 2 absent to recommend approval of a significant wildlife habitat designation over most of the West Hills Rural Area, excluding only the Bonny Slope area (see Exhibit 4).

III. ANALYSIS

RESOURCE DESCRIPTION

No precise definition for wildlife habitat is contained within the Oregon Statewide Planning Goals document or the Oregon Administrative Rules -- it is the responsibility of the local jurisdiction to make findings, based upon evidence, that an area is or is not significant for wildlife habitat. Multnomah County contains a number of existing areas which are identified as wildlife habitat, including areas which are important for big game, waterfowl, and sensitive bird species. However, recent studies have documented the importance of preserving whole ecosystems for a full range of wildlife, from insects to large carnivores, as opposed to identifying and preserving small areas for a certain target species of concern such as elk, or bald eagles. These studies (see bibliography for Wild About the City and A Study of Forest Wildlife Habitat in the West Hills, discussed later in this report) assert that the only way to preserve sensitive species from further

declines in population or extinction is to preserve large, contiguous areas of the entire ecosystem in which these species reside.

At the July 26, 1993 Planning Commission hearing, a very generalized definition of wildlife habitat was offered by staff. Subsequent to that hearing, the Oregon Department of Fish and Wildlife proposed an alternative definition of wildlife habitat, which was adopted by the Commission as part of its recommendation on September 7, 1993. That definition reads as follows:

""Wildlife habitat is an area containing physical and biological features which supply resources sufficient to sustain the presence of a resident or migratory wildlife species population for at least some part of their annual life cycle. Such an area is significant if it is large enough to sustain a viable population; or sustains the presence of unique, sensitive, threatened, or endangered species; or provides a critical component to a species' life requirements during some time during the year (i.e. nesting or roosting sites, big game winter range); or sustains the presence of a high diversity of native plant or animal species; or comprises a functioning ecosystem in whole or in part (i.e. wetland, old growth forest); or provides a connection between other areas of significant wildlife habitat (i.e. riparian or upland wildlife corridor)."

Staff recommends adoption of this definition of wildlife habitat as part of the proposed action.

LOCATION

Wildlife are guided in their choice of locale and movement by natural features which may allow or hinder their movement (watercourses, terrain, type of vegetation) and built features which hinder them (roads, residences, fences, agricultural operations). Given the large population of the Portland Metropolitan Area, the latter set of constraints are far more important in the patterns of wildlife habitation and migration. The West Hills rural area has a limited number of built features due to its location outside of the urban limit line and its low intensity levels of agricultural and forestry operations, and rural residential development. This area has been identified as a potential wildlife habitat area, and is a portion of a contiguous wildlife habitat area which includes lands to the southeast (Forest Park in the City of Portland) and northwest (undeveloped lands in Washington and Columbia Counties, eventually reaching the Coast Range).

The West Hills Rural Area can be divided into several sub-areas for the purpose of analyzing the potential for quality and quantity of wildlife habitat (see Exhibits 1 and 3, Pgs. 12 and 14).

Northern Forested Area

This area consists of lands north and west of Forest Park, lying to the west of Highway 30, and to the north of existing rural residential and agricultural development in the vicinity of Skyline Road, Cornelius Pass Road, and Rock Creek Road. The southern boundary of this forested area in the Rock Creek Road area continues into Washington County as the boundary between agricultural and forest lands. These lands are almost entirely designated for Commercial Forest Uses, which are in varying stages of growth and production. It should be noted that this area includes small "pockets" of developed rural lands along the west side of Highway 30 and along roads connecting Highway 30 with Skyline Blvd. such as Cornelius Pass Road, McNamee Road, Newberry Road, and Logie Trail. Also, a small area of developed rural lands lies along Gilkison Road in the far northern portion of Multnomah County(see Exhibit 3).

Western Agricultural Area

This area consists of lands along the western edge of Multnomah County, bounded to the north by the forested areas described above, to the west by Washington County agricultural lands, to the east by rural residential development and Forest Park in the City of Portland, and to the south by Springville Road. This area is primarily designated for agricultural uses, which are generally low-intensity in nature. Some commercial forestry areas and areas of rural residential development exist as well(see Exhibit 3).

Bonny Slope Area

This area consists of rural residential, forest, and agricultural lands, of a generally higher intensity than those lands to the north. It is bounded to the west and south by lands within the Urban Growth Boundary in Washington County designated for urban residential development of 4 to 7 dwelling units per acre, to the east by lands within the City of Portland's Urban Growth Boundary designated for densities of 4 dwelling units per acre, and to the north by agricultural and rural residential uses in Multnomah County and the City of Portland(see Exhibit 3). The Bonny Slope Area can be further divided into two subareas, one consisting of the Bonny Slope Subdivision along both sides of Laidlaw Road, and a subdivided area along Thompson and McDaniel Roads (an area which contains over 100 residences), the other an area of primarily forested and agricultural areas south of Springville Road.

Balch Creek Area

This area consists of the unincorporated, non -urban lands within the Balch Creek basin, as well as a small area to the far north which is within the Saltzman Creek watershed. It is mostly designated for Commercial Forestry uses, and also contains a significant amount of rural residential development. It is bounded to the west and south by urban lands both unincorporated and within the City of

Portland, and to the north and east by Forest Park and MacLeay Park within the City of Portland(see Exhibit 3).

QUANTITY

OAR 660-16-000(3)...A Determination of quantity requires consideration of the relative abundance of the resource (of any given quality).

Some amount of wildlife habitat occurs in all non-urban portions of Multnomah County. In the absence of more specific data on wildlife resources within other non-urban portions of Multnomah County, the best available standard of comparison of wildlife abundance (quantity) is the total size of each non-urban area within Multnomah County. The West Hills Rural Area is 30 square miles (approximately 19,091 acres) in size. The following table compares the size of the West Hills rural area to other non-urban portions of Multnomah County:

TABLE 1: RELATIVE SIZE OF MULTNOMAH COUNTY NON-URBAN AREAS

<u>AREA</u>	<u>SIZE</u>	<u>% OF NON-URBAN AREAS</u>
West Hills	30 sq. mi.	12%
Sauvie Island	26 sq. mi.	10%.
West of Sandy River	16 sq. mi.	6%
East of Sandy River	128 sq.mi.	51%
<u>Columbia Gorge NSA Area</u>	<u>52 sq. mi.</u>	<u>21%</u>
TOTAL NON-URBAN AREA	252 sq. mi.	100%

In addition, the quantity of the wildlife habitat resource should be measured against three other areas outside Multnomah County and one area within the City of Portland. These areas are chosen because they are directly adjacent to the West Hills Rural Plan Area(see Exhibit 2).

Washington County Forest

This area, in Washington County, is a non-urban forested area bounded to the west by Highway 26, to the north by the Washington County line, to the east by the West Hills Rural Plan Area, and to the south by mixed agricultural and rural residential uses within Washington County. It is approximately 100 square miles in size and is almost entirely designated Washington County for non-urban, forest uses. It should be noted that west of Highway 26 lie the forested natural areas of the Oregon Coast range(see Exhibit 2).

Washington County Farm

This area, also in Washington County, is a non-urban area consisting primarily of agricultural and rural residential uses which is bounded to the south by Highway 26 and the community of North Plains, to the east by the West Hills Rural Plan

Area, and to the north and west by forested lands within Washington County. It is approximately 40 square miles in size(see Exhibit 2).

Columbia County Forest

This area is within Columbia County and is designated primarily for non-urban forest uses, with some rural residential pockets included. It is bounded to the north and east by the communities of Chapman and Spitzenberg along the Scappoose-Vernonia Road, to the west by State Highway 47 and the Community of Vernonia, and to the south by the West Hills Rural Plan Area. It is approximately 80 square miles in size. It should be noted that west of Highway 47 and Vernonia lie the forested natural areas of the Oregon Coast Range(see Exhibit 2).

Forest Park

The Forest Park area within the City of Portland is a public "natural" park with significant quantities of wildlife as documented by various sources. It is bounded to the north by the West Hills Rural Plan Area, to the south by Cornell Rd., to the east by urban development within Northwest Portland, and to the west by the Balch Creek portion of the West Hills Rural Plan Area and low-density residential development within the City of Portland. It is approximately 8 square miles in size(see Exhibit 2).

The following table compares the size of the West Hills Rural Plan Area to these three areas outside of Multnomah County which are contiguous to the West Hills:

TABLE 2: RELATIVE SIZE OF NON-URBAN AREAS ADJACENT TO THE WEST HILLS

<u>AREA</u>	<u>SIZE</u>	<u>% OF AREA</u>
West Hills	30 sq. mi.	12%
Washington County Forest	100 sq.mi.	38%
Washington County Farm	40 sq. mi.	16%
Columbia County Forest	80 sq. mi.	31%
<u>Forest Park</u>	<u>8 sq. mi.</u>	<u>3%</u>
TOTAL AREA	258 sq. mi.	100%

Summary

Based upon this measurement of quantity of non-urban areas with some value for wildlife habitat, the West Hills area constitutes 12% of the total non-urban areas of Multnomah County which have some quantity of wildlife habitat. It constitutes 12% of a contiguous non-urban and natural park area northwest of and within the City of Portland. Without regard to quality, this quantity of wildlife habitat does not appear to be significant.

Staff Report

October 12, 1993

QUALITY

OAR 660-16-000(3): The determination of quality requires some consideration of the resource site's relative value, as compared to other examples of the same resource in at least the jurisdiction itself.

This report uses two attributes to measure quality of the wildlife habitat resource in the West Hills, 1) the actual quantity and diversity of the species to be found in the West Hills area along with a comparison of the wildlife values of this area with the values found in other non-urban areas within Multnomah County and adjacent areas of Washington and Columbia Counties, and 2) the connectivity of the West Hills area to other wildlife habitat areas and its relative importance in the overall framework of this larger ecosystem.

West Hills Wildlife Quantity and Diversity

Multnomah County has commissioned two studies of wildlife in the West Hills, which, along with other relevant studies, are summarized below.

WILD ABOUT THE CITY (Marcy Houle, 1990)

This report discusses the concept of contiguous areas of natural habitat for wildlife and the results of the fragmentation of habitat into "islands." In the latter instance, numerous biological studies (see bibliography for "Wild About the City") have documented the diminishment and loss of native plants and animals due to a lack of connection to a larger ecosystem. Continued development in the West Hills wildlife area would result in the fragmentation, and therefore the degradation of both the West Hills' and Forest Park's natural systems, the loss of species diversity (particularly for larger mammals such as bears, elk, and cougars which require large habitat areas for each animal), the permanent loss of natural populations to catastrophe such as fire, and the weakening of plant and animal populations due to the lack of genetic diversity available in larger areas.

A STUDY OF FOREST WILDLIFE HABITAT IN THE WEST HILLS (Esther Lev, Jerry Fugate, Lynn Sharp, 1992)

This report provides a more in depth study of existing wildlife within the West Hills area. Research for the study included a series of six transects throughout the region, representing different types of land use (forested, residential, agricultural, clear-cut forest, quarry). A total of 19 species of mammals (including coyote, black bear, mountain beaver, trowbridge's shrew, and coast mole) and 34 species of birds (including Swainson's thrush, pine siskin, downy woodpecker, and black-headed grosbeak) were observed during the field study from both trapping and observations. The specific outcome of the transect evaluations are contained within the report; however, the transect with the most species diversity and numbers were found in the "control" transect within the boundaries of Forest

Park. This indicates the high wildlife habitat values to be found within the park, and the importance of integrating Forest Park into a larger contiguous wildlife habitat area in order to protect this high value. The amount and diversity of wildlife within the rural West Hills area to the northwest of Forest Park is somewhat lower due to the impact of residential development, agriculture, quarry operations, and commercial forestry. However, each of the five transects outside of Forest Park showed significant numbers and diversity of wildlife, indicating that this area remains an important area for native plants and animals.

The study documents the need for a contiguous natural area connecting Forest Park with the large undeveloped lands to the north and west in order to maintain species diversity. This contiguous natural area would need to be a minimum of one-half mile in width, with other areas as much as one and one-half miles wide, in order to maintain the natural connections. A continuous forested connection through the area is essential in providing "cover" for wildlife habitat and migration.

OTHER STUDIES

The City of Portland has thoroughly studied the quality of wildlife habitat in the area of Forest Park to the south of the proposed West Hills wildlife habitat area/corridor. The "Northwest Hills Natural Areas Protection Plan," (adopted 1992) documents the abundance of wildlife habitat in Forest Park and the surrounding areas within the City of Portland. The "Balch Creek Watershed Protection Plan" (adopted 1990) provides information about the wildlife habitat values in the portions of the Balch Creek basin which are within the Urban Growth Boundary and the Portland City limits. Both reports provide information about wildlife habitat values within adjacent unincorporated areas west and north of Forest Park, and within the Balch Creek basin. These habitat values are significant, associated with forested lands and the wildlife which inhabit them (such as salamanders, frogs, snakes, lizards, over 80 species of birds, and 62 mammal species, from squirrels and chipmunks to bears and cougars).

The County has already identified two significant wildlife habitat areas within the West Hills Rural Area based upon information compiled by the Oregon Department of Fish and Wildlife, a big game wintering habitat within much of the Northern Forested Area, and a bald eagle roost in the vicinity of Dixie Mountain in the far northern portion of the County. Additionally, fish and riparian-based flora and fauna are a significant identified resource within major streams in the West Hills area.

Comparison with Other Non-Urban Habitat Areas

Sauvie Island

Unlike the West Hills, the Multnomah County portion of Sauvie Island Area is generally flat, and approximately two-thirds is devoted to agricultural uses, of a

significantly more intense nature than those in the West Hills, befitting the higher quality of soils on the island. Sauvie Island contains significant identified fish and wildlife habitat areas, including a large sensitive waterfowl area in the northern portion of the island. The Multnomah Channel Area, between Sauvie Island and Highway 30, contains significant identified wetland resources such as the Burlington Bottoms wetland located in the vicinity of the Sauvie Island bridge. While Sauvie Island provides very important habitat for waterfowl, fish, and wetland flora and fauna, it is relatively unimportant for terrestrial wildlife due to the preponderance of agricultural uses on the island and the its isolation by water from nearby wildlife habitat areas within the West Hills (separated by Multnomah Channel) and in Washington (separated by the Columbia River)

Eastern Multnomah County Non-Urban Areas

Two of the eastern three rural areas (East of Sandy River and Columbia Gorge NSA Area) contain significant identified wildlife habitat areas, including large big game wintering areas and osprey nests. While no significant wildlife habitat areas have been identified by the Oregon Department of Fish & Wildlife in the West of Sandy River area, the Sandy River Gorge is identified as a significant natural area. These areas appear to maintain significant connectivity to each other and to adjacent areas of the Cascade Range -- however, this wildlife community is distinct from the wildlife in the Coast Range and West Hills area.

Washington County Adjacent Non-Urban Areas

The Washington County Forested area between the West Hills Rural Area of Multnomah County and Highway 26 is designated on the Washington County Rural/Natural Resource Plan as a Wildlife Habitat Area, which contains sensitive habitat identified by the Oregon Department of Fish & Wildlife and forested areas coincidental with water areas and wetlands. The Washington County Non-urban farm areas contain a small amount of sensitive wildlife habitat. These areas are connected and contiguous to Columbia County natural areas to the north, the West Hills of Multnomah County to the east, and the Coast Range to the west and southwest.

Columbia County Adjacent Non-Urban Areas

The Columbia County forested area to the north of the West Hills Rural Area is designated by the Columbia County Comprehensive Plan as a major big game habitat area. These areas are connected and contiguous to the Washington County natural areas to the southwest, the West Hills of Multnomah County to the southeast, and the Coast Range to the west.

Forest Park Area

Based upon comprehensive studies, the City of Portland has identified large areas within and around Forest Park as significant wildlife protection areas, and

has protected these areas through implementation of an environmental overlay zone which restricts disturbance and development of sensitive areas. Forest Park is connected and contiguous to the West Hills area to the west and north-west.

West Hills Wildlife Connectivity

The West Hills Rural Area is directly connected to wildlife habitat areas to the south in the Forest Park Area of Portland, the west in Washington County, and the north in Columbia County. The two latter areas in turn are connected to a large area of wildlife habitat that extends to and throughout the Coast Range of Oregon, south of the Columbia River. Thus, elimination or degradation of wildlife habitat values in the West Hills Rural Area would break the link between the Forest Park natural areas and the larger wildlife habitat areas of the Oregon Coast Range. This would result in the degradation of natural habitat in Forest Park, due to its resultant isolation from other natural areas. Forest Park is of the highest quality of wildlife habitat, not necessarily because of its abundance of wildlife species compared to other natural areas of Western Oregon, but rather because of its abundance of wildlife species in an area immediately adjacent to the City of Portland, where wildlife has been extirpated or severely limited by urban development. The West Hills Rural Area itself is within several miles of significant metropolitan populations, which makes its wildlife habitat significantly more valuable than comparable areas in the remainder of Multnomah County, Washington County, or Columbia County. Thus, the West Hills provides the most important ability to maintain significant wildlife and natural areas in such close proximity to the populations of the Portland Metropolitan Area.

Summary

Based upon the available information regarding the quality of wildlife habitat, any portion of the West Hills Area should be considered an area with significant wildlife habitat if the following two conditions apply: 1) a generally good quality of wildlife habitat values in the area, and 2) important as part of a larger wildlife habitat area providing the link between the Forest Park area of the City of Portland and its important wildlife habitat and the Coast Range of Oregon.

IV. CONCLUSIONS

Based upon an analysis of quantity and quality of wildlife habitat areas, the Planning Commission and staff recommend the following actions regarding the significance of wildlife habitat values within the four sub-areas of the West Hills Rural Area.

Northern Forested Area

This area is the prime focus of wildlife habitat in the West Hills. The Lev study shows clearly the superior wildlife values to be found in undisturbed forest habitat, which covers much of this area. While lesser values of habitat are found in clear-cut forest and rural residential areas, such areas also contain significant amounts of wildlife habitat value. This area includes the two existing Goal 5 significant wildlife habitat areas in the West Hills. Also, this area abuts Forest Park to the south and the forested areas of Washington and Columbia Counties on the north and west, thus providing the key link in maintaining the wildlife habitat values of the Forest Park Area. THIS AREA SHOULD BE DESIGNATED A SIGNIFICANT WILDLIFE HABITAT AREA.

Western Agricultural Area

This area is less significant than the Northern Forested Area in terms of wildlife habitat, due to the development of agricultural and rural residential uses, which are of lesser value to wildlife due to the presence of humans. However, the Lev study shows that agricultural and rural residential areas in the West Hills Rural Area contain some wildlife habitat value, which is confirmed by anecdotal observations of wildlife by residents in the area. Some fragmented forested areas also exist, providing cover for wildlife. This area is connected to a similarly developed area in Washington County to the west -- both of these areas provide a "buffer zone" between the higher quality wildlife habitat forested areas to the north and the urban areas to the south. THIS AREA SHOULD BE DESIGNATED A SIGNIFICANT WILDLIFE HABITAT AREA.

Bonny Slope Area

BONNY SLOPE SUBDIVISION

This area contains lesser wildlife habitat value than the agricultural area to the north due to the higher intensity of residential and agricultural land uses (although some forest-designated lands exist in this area as well). Also, this area is bounded on three sides by lands within the urban growth boundary which are planned for residential densities of four units per acre or greater, and is not directly adjacent to any significant forest habitat areas. THIS AREA SHOULD NOT BE DESIGNATED A SIGNIFICANT WILDLIFE AREA.

AREA SOUTH OF SPRINGVILLE ROAD

This area of approximately 400 acres consists primarily of forest and agricultural lands. It also contains wildlife habitat value in that it has the headwaters of a tributary of Beaverton Creek, pursuant to studies of the adjacent Skyline West area of the City of Portland conducted by the Portland Planning Bureau. Although the areas to the east of this subarea in the City of Portland are within the Urban Growth Boundary, they also contain areas of significant environmental

resources which are protected or planned to be protected by the City of Portland. Additionally, testimony of observed wildlife in this area was presented to the Board of Commissioners at the October 12 public hearing. For these reasons, THIS AREA SHOULD BE DESIGNATED A SIGNIFICANT WILDLIFE HABITAT AREA.

Balch Creek Area

This area contains some habitat value associated with the relative lack of development in comparison to adjacent areas and the importance of the Balch Creek watershed, as documented by the City of Portland. It is also adjacent to the Forest Park area to the north and west, and provides an extension of wildlife habitat values existing in that area. Like Forest Park, its habitat value lies not in an absolute measure of wildlife abundance and diversity, but rather in its relative value as a forested watershed and wildlife area in close proximity to the Portland Metropolitan Area. THIS AREA SHOULD BE DESIGNATED A SIGNIFICANT WILDLIFE AREA

Recommendation:

Adopt the attached resolution which takes tentative action to designate the West Hills Wildlife Habitat Area 1C, a significant wildlife habitat resource. Direct preparation of a report identifying conflicting uses, determining the economic, social, environmental, and energy consequences of these conflicting uses, and developing a program to achieve the goal and resolve conflicts by either protecting the resource site, allowing conflicting uses fully, or limiting conflicting uses.

V. COMMENTS ON ADDITIONAL WRITTEN TESTIMONY

Attached to this report are all written comments received at or since the July 26 hearing, along with appropriate staff responses. Based upon a review of all of the testimony, staff has no changes to make in its recommendation. The Planning Commission considered all written testimony provided, along with the staff responses. The only change resulting from the written testimony regards the definition of Fish & Wildlife habitat, as discussed earlier in this report.

**WEST HILLS
RURAL AREA PLAN
SIGNIFICANT
WILDLIFE AREAS**

EXHIBIT 4



SIGNIFICANT WILDLIFE
HABITAT AREAS

