

**Responses to Public Submittals on
South Ridgeline Habitat Study**

August 2007

After the November 2006 Draft Inventory and Assessment Report was made available for public review, 38 submittals containing comments or information were received by the City. Planning and Development Department staff and the project consultant Salix Associates, both reviewed all 38 submittals in detail. The following table briefly describes the submittals and notes the response to each.

Name/Date	Submittal/Concern	Affected HAU/VMU	Response
<p>L. Warnes 5/7/06</p> <p>Email with 9 attachments.</p>	<p>Assessment of possible park acquisition from Eugene Parks and Open Space Division. No specific request related to SRHS.</p> <p>Christmas Bird Count information for South Hills. No specific request related to SRHS.</p> <p>Six additional short attachments related to rare species and habitat values.</p>	<p>HAU 12 (portion known as "Green" property)</p> <p>Unknown HAU.</p> <p>HAU 12 ("Green" property)</p>	<p>Assessment submitted mostly is general regarding wildlife habitat, and contains errors or is out-dated (e.g., white-tailed deer not known in this area; several highly invasive species are present in large quantities on the site). Value of forest habitat not presented in larger context relative to other habitat values used for SRHS assessment. Mature forest character and rare species suitabilities are already accounted for in draft SRHS study. Northern Red-legged Frog confirmed near drainageway (AJ).</p> <p>Response: Added Northern Red-Legged Frog sighting for VMU 12AJ.</p> <p>Two uncommon/rare species were included on the list provided (Pileated Woodpecker, Western Bluebird), but lack of specific location data did not allow the information to be associated with any SRHS HAUs.</p> <p>Response: No change required.</p> <p>All of this information was utilized in the SRHS assessment of the site.</p> <p>Response: No change required.</p>
<p>L. Warnes 11/15/06</p> <p>Email with 12 attachments.</p>	<p>Assessment of possible park acquisition from Eugene Parks and Open Space Division.</p> <p>Site information from Ethen Perkins,</p> <p>No specific request related to SRHS.</p>	<p>HAU 12 (portion known as "Green" property)</p>	<p>All of this information was utilized in the SRHS assessment of the site. Several items duplicate items previously submitted 5/7/06.</p> <p>Response: No change required.</p>

	Northern Red-legged Frog photo	Apparently HAU 12 ("Green" property)	No new information. Duplicates item in 5/7/06 submittal. Response: No change required.
	Photo of Pileated Woodpecker.	Apparently HAU 12 ("Green" property)	No new information. Response: No change required.
	Photo of Tall bugbane.	Apparently HAU 12 ("Green" property)	No new information. Response: No change required.
S. Palsbo 2/28/07	ORV and hiker use of their private property is occurring. Native landscaping would be preferred at entry to development area, not ornamentals. Wild turkey management plan desired.	HAU 3	Information submitted is not pertinent to SRHS inventory and assessment. Response: No change required.
C. Jackson 3/13/07 3/15/07	Remove northern portion of tax lot 1803174001002 from inventory, as it is being landscaped with ornamental rock garden. Lacks vegetation continuity to E and W.	HAU 13U,Y	Consultant field checked on 20 June 2007. Consultant agreed that active landscaping of this area had lowered habitat values below threshold for inclusion in SRHS inventory. Response: Moved VMU 13Y line south to tree line.
R. Ingram D. Ingram 3/20/07	Buy more land and create corridors for forest wildlife, provide trails, limit development, restrict UGB expansion, do not create oak-pine savannas as there is too much rainfall here.	Not site specific	Comments about land acquisition and regulation are beyond scope of SRHS inventory and assessment, but will be incorporated in later phases. Rainfall is not a limiting factor in the presence or persistence of savanna habitat within the study area. Limiting factors include invasion by Douglas fir, transition to other forest or woodland habitats, and conversion to urban land uses. Response: No change required.

<p>M. Holden 3/23/07</p>	<p>Map, photos, and descriptive information about plants and habitat features in VMUs 17A, 17B, and 17C. No specific request related to SRHS.</p>	<p>HAU 17A-C HAU 16F-G</p>	<p>Submittal information considered and area revisited by consultant, who found that viewing site from streets is very difficult. PIWO sighting information is not specific, but PIWO foraging information is specific, and has now been added to data sheet 17-C.</p> <p>Response: Added the following areas to the inventory:</p> <ul style="list-style-type: none"> - HAU 17 A-C: add VMU 17M between A and C - HAU 17-C: add new oak forest VMU 17L at SE corner - HAU 17-C: expand on NE and SW to include additional forest areas - HAU 16-G: expand shrubland (VMU 17F) and add steep meadows (VMU 17G)
<p>C. Land 3/27/07</p> <p>Letter with 3 attachments.</p>	<p>Property should not be included in SRHS because: Class VI soils not suitable for woodland production, proximity to I-5 endangers wildlife, power line easement should be exempt from Goal 5, and survey did not take into consideration neighborhood factors, including impact of homeless camps.</p>	<p>HAU 21S (et al.)</p>	<p>This submittal is relevant more to Lane County zoning designation rather than the SRHS. Only the extreme NW corner of the specified tax lot is within the UGB and the SRHS. That corner has characteristics and values similar to the surrounding, undeveloped area within the UGB (thus was included in the City's study area), and was inventoried and assessed similarly. No power line corridor is visible on aerial photos in that area. There is a power line corridor to the west of the area addressed by these comments. It has some habitat value, and is assessed separately</p> <p>Soil type is not included as a factor in the classification and assessment of habitat as defined in regional conservation documents cited nor as applied in the SRHS. "Marginal land" is a Lane County zoning term, and is not a category used in the SRHS. Connectivity issues affecting terrestrial wildlife species were considered in the SRHS (see HAU 21 rating sheet). NW corner of tax lot is similar to adjacent lands within UGB, and was treated similarly.</p> <p>Response: No change required.</p>
<p>J. Lange K. Gardner 3/26/07</p>	<p>SRHS boundary includes treeless areas (back yards on aerial photo).</p>	<p>HAU 17K</p>	<p>Mapped correctly to exclude these backyards on original field map, but a mapping error occurred during GIS translation.</p> <p>Response: Corrected map by moving east edge of 17K to west to exclude two back yards.</p>

<p>H. Bashi 3/28/07</p>	<p>Conserve HAU 10 areas because they would expand the Ridgeline Park and serve as a connection between two high value areas.</p>	<p>HAU 10</p>	<p>Park expansion, per se, is not a consideration of SRHS Inventory and Assessment ratings. Connectivity is, however, and was factored into the HAU 10 ratings.</p> <p>Response: No change required.</p>
<p>Mittge/Hughes 3/28/07</p>	<p>The issues in this submittal are paraphrased into the four listed here: A. Not all developed areas on these tax lots were excluded from the inventory, but should be. B. Site is not suitable for some specific rare plant species. C. Grazing eliminates rare plant suitability. D. Portions of the subject site have lower tree cover than the mapped cover type definitions indicate. A sliver on the north side of Owl Road should not be mapped as woodland.</p>	<p>HAU 10AE</p>	<p>A. To be consistent with the SRHS mapping in other areas (and in agreement with the comment), the developed area on the west side of the structures on tax lot 2300 should be expanded. Inclusion of the dwelling area on tax lot 2400 as habitat, however, is consistent with the inventory, in that it has an overstory of ponderosa pine and Oregon white oak. Values of this type of overstory are discussed in the report and attachments. B. The SRHS assessment of general habitat suitability for rare species is <u>not lot specific</u>, and a determination of which individual species may or may not be present on a specific lot in a portion of a larger, general mapped cover (habitat) type area was beyond the scope of this project. The SRHS rating system uses other considerations to modify the general cover type suitability ratings at the scale of each VMU. C. Although grazing, especially heavy grazing, can degrade native habitats and impact rare species, grazing does not necessarily eradicate all rare plants (or wildlife). For example, the largest population of Kincaid's lupine (federally listed as Threatened) known in Lane County was discovered in a pasture that was being grazed by horses. D. It is expected and typical throughout the inventory that tree densities will vary within a cover type. It is important to note that assessment and ratings do not apply to a portion of a mapped VMU (such as the small area along Owl Road), but rather, to a mapped VMU in its entirety. In general, developed areas where little or no native plant or wildlife habitat remain were mapped DV (developed), and generally, are not considered as habitat for purposes of the SRHS. Houses occurring in areas with valuable overstory generally were included in the inventory. Minimum habitat patch size for mapping was 2 acres for most habitats, and smaller for some high quality rare habitats. That is, different types of habitats occurring in patches smaller than 2 acres typically were included within larger habitat patch mapping, and notes were made regarding their occurrence on the VMU inventory sheet and incorporated into ratings where important. Habitat mapping is done typically at a scale small enough to show important detail, but large enough to recognize ecological character at a landscape (broader) scale.</p> <p>Response: Extended DV (developed) area on Tax Lot 2300 to west.</p>

<p>Hiaasen/ Cordell 3/28/07</p>	<p>A. Septic drainfield occupies half of area N of house to property line. Was planted with clover/meadow mix. Entire N ½ understory maintained to some degree. Even one tree seen in an aerial photo caused designation of a habitat area.</p> <p>B. Inconsistency: tree strip along Woodleaf Village excluded vs. tree strip across Fox Hollow included. Why was WV excluded from inventory?</p> <p>C. Inconsistency scoring habitat values at HAU 9 vs. HAU 10 specific locations.</p> <p>D. Small strip of trees that is part of St. Jude was not included.</p> <p>E. Why are two similar properties at NW corner and SW corner of Fox Hollow and Owl rated differently?</p>	<p>HAU 9, 10, 12</p>	<p>A. Assessment was done using offsite methods (see SRHS Report). Septic drainfield appears on aerial to be relatively small part of area N of house, but somewhat difficult to tell on aerial because of many trees and shadows. The house and cleared area to north of it were not included in inventory (labeled DV – Developed). Although the cover type of an area may score high, the additional factors of exotic-dominated understory and disturbance can reduce a VMU score – as in this case. The actual VMU score is not high. Both areas with and without tree cover are included in the inventory. Many valuable areas in the inventory are treeless.</p> <p>Response: No change required.</p> <p>B. Tree strip on Woodleaf side is very narrow, while across street clearly is much wider. Draft inventory followed City's original study area boundary in that area, which does include part of the small finger of trees along Fox Hollow at Woodleaf. We recommend extending it northward to include more, although the values of that area are fairly low because of its narrow configuration.</p> <p>Response: Added small strip of trees on east edge of HAU 12 along Fox Hollow just north of West Amazon.</p> <p>C. Habitats do not score higher for being near manicured lawns (i.e., cemetery), and tree cover types are rated differently. For example, mixed forests score higher than conifer forests. This methodology, including all the factors which were considered, is explained in detail in the report.</p> <p>Response: No change required.</p> <p>D. The small area of trees in front of and to south of St. Jude is below the minimum size threshold for inclusion in the SRHS.</p> <p>Response: No change required.</p> <p>E. Maps and rating sheets explain in detail the answer to this question. In summary, each of these two corners is a part of a different VMU. One VMU is a cover type of woodland (to the north), the other VMU is forest (to the south). The overall qualities of each VMU are rated in the SRHS, but the individual qualities of every small area within each VMU could not be rated within the scope of the SRHS.</p> <p>Response: No change required.</p>
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C. Jackson 4/1/07	Duplicate of 4, with some additional information.	---	---
M. Holden 4/9/07	Supplements her 3/23/07 submittal. Additional woodpecker tree photo, near first photo location. Additional wildlife and native vegetation information.	HAU 17	White-tailed deer are not documented in this area. Black-tailed deer are often mistaken for them, however. Partial albinism is documented in black-tailed deer. Response: No further change required.
L. Warnes 4/11/07 Letter with 3 attachments.	No specific request related to SRHS related to SRHS. Submittal of additional information for Exhibit A: Map of rare plants, RLF. Exhibit B: Natural resource site survey. Exhibit C: Habitat values. Exhibit D: Non-vascular plant survey. Exhibit E: NRLF narrative. Exhibit F: Natural resources assessment.	HAU 12 (portion known as "Green" property)	Exhibit A shows locations of species. The species of SRHS conservation concern already were documented on site and the information recorded on the data sheets for the area. Exhibit B appears to be very similar to previous submittal. No new information readily apparent. Exhibit C is a duplicate of previous submittal. Exhibit D (nonvascular information) while interesting, is not addressed in the SRHS assessment methodology. Exhibit E provides good background on NRLF biology and potential effects of development, but is not directly applicable to SRHS assessment. Response: No change required.
L. Warnes 4/11/07	No specific request related to SRHS related to SRHS. Rare species analysis.	HAU 12 (portion known as "Deerbrook PUD" property)	The attached report was previously submitted as testimony for a PUD application. It discusses the original <i>Eucephalus (Aster) vialis</i> population present, a transplanting operation, the apparent survival of some plants in the source and destination sites, and a second (apparent) transplant operation. The survival of EUCVIA at the source site is apparently not documented (nor is it at the destination site). Other rare species which could occur on site are discussed more generally. (Note: <i>Presence</i> of rare species is not used in SRHS evaluation.) Response: No change required.
L. Warnes 4/11/07	No specific request related to SRHS related to SRHS. Photographs of common native plant species.	HAU 12 "Beverly Parcel"	Plant species pictured are common throughout the study area and in the Willamette Valley. Response: No change required.

K. Matthews 4/11/07	No specific request related to SRHS related to SRHS. 12 pages of notes of site observations associated with GPS data points.	HAU 12 Owl Road area.	The submittal was examined for facts relevant to SRHS inventory and assessment. Several PIWO and large tree references checked against SRHS data sheets. All were previously noted on VMU data sheets. Other sightings were smaller trees, common wildflowers, etc., not specifically relevant to SRHS assessment. Response: No change required.
R. Karmy 4/11/07	No specific request related to SRHS related to SRHS. Accounts of sightings of common wildlife species, including some exotic (pheasant, turkey, opossum). No map submitted.	HAU 8O? (interpreted)	This area was inventoried as part of the SRHS. No locations or distances included with submittal, so scale of area discussed not known. Some species mentioned are exotics (see to left). Response: No change required.
D. Grant 4/11/07	No specific request related to SRHS.	HAU 10M? (interpreted)	Very general information submitted. Map appears drawn with north-south reversed. Area was inventoried in detail for SRHS as HAU 10. Response: No change required.
D. Goldfarb 4/11/07	No specific request related to SRHS. Very general information submitted (raptors, turkeys, etc.).	HAU 12	Area was inventoried in detail for SRHS. Turkeys are an exotic species. Response: No change required.
D. Mardane 4/11/07	No specific request related to SRHS. Common wildlife species listed.	N/A	One exotic species identified (turkey). Area not within SRHS delineated study area. Was identified as part of a potential future study area (addition). Response: No change required.
T. Krumm 4/11/07	No specific request related to SRHS. Two common wildlife species listed: turkeys (feed them) and deer. Fir trees.	HAU 17? (Not clear from submittal.)	Turkeys are an exotic species. Fir trees very common. Probably subject area was inventoried in detail for SRHS (HAU 17). Response: No change required.

W. McDonald 4/11/07	No specific request related to SRHS. Blue herons noted in trees.	N/A	Area addressed apparently is NW portion of Fox Hollow School property. Not included within the City's original study area, and too small to be considered for an addition. Could be considered in a future study. Great blue herons are not a rare species, but a rookery (nesting site) would be important. With adjacent school grounds and residences, likely it is not a long term rookery. Roosting is mentioned in submittal, but nesting is not. Response: No change required.
S. Youngsblood 4/11/07	No specific request related to SRHS. Common wildlife species listed for meadow at base of Baldy. Pond, wetlands mentioned.	HAU 13B & D	Area was inventoried in detail for SRHS; no new information provided. Response: No change required.
C. Madrone S. Madrone 4/11/07	No specific request related to SRHS. Common wildlife and plant species listed.	HAU 13	One listed species (turkey) is exotic. Fir trees very common. Apparent subject area was inventoried in detail for SRHS (HAU 13-AB), but northern end was recommended for deletion because it is developed. No access permission was granted for this area, so it was evaluated from roads and aerial photos. No new relevant information provided. Response: No change required.
D. Kofranak 4/11/07	Non-vascular plant survey.	HAU 12 (portion known as "Deerbrook PUD" property)	Non-vascular information is interesting, but as it is not available for other sites, it was not included in the SRHS assessment system. (And some of the listing statuses for some species in the report are not accurate.) Response: No change required.
K. Saranpa 4/11/07	Wants Crest Drive inventoried trees included in inventory.	Possibly HAU 9	No map included. In general, if the trees were within important habitat areas, and were in or adjacent to the delineated study area, they were included in the SRHS inventory area. Response: No change required.
S. Giustina 3/29/07	Agrees with stand age determined in SRHS inventory.	HAU 17C	No specific proposal, but see proposed addition under #7 above. Response: No change required.

G. Wuerthner 4/7/07	Supports Ridgeline study and more park land purchase.	General.	No specific proposal. Response: No change required.
D. Moon 4/20/07	Supports SRHS and preservation of oak habitats.	General.	No specific proposal. Response: No change required.
L. Howard 4/12/07	Disenchanted with previous City efforts to conserve lands. Hopes this time will be better.	General.	No specific proposal. Response: No change required.
K. Matthews 4/27/07	Numerous photographs provided to incorporate into study.	HAU 12	These photos support written notes submitted with his 4/11/07 submittal. No new information provided. See response above. Response: No change required.
K. Matthews, B. Elliot 4/27/07	Spotted owl observed in Spencer Butte Park just west of Fox Hollow.	HAU 10W (likely)	Likely an incidental sighting of a dispersing juvenile bird, not nesting or foraging of a resident bird. If regular use of habitat was occurring there, the local bird watching community would be very aware of the bird. A similar sighting (with accompanying photograph) occurred just southeast of Spencer Butte Park across Willamette Street (outside the UGB) several years ago. Response: Added Northern Spotted Owl to 10-W species list.
T. Bielfeldt 4/25/07	No specific request related to SRHS. Common wildlife and plant species listed.	HAU 17	Area of interest was in SRHS inventory as VMUs A and C. No new information provided. Response: No change required.