



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Tualatin River National Wildlife Refuge  
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February 7, 2023

Jamie Fender, King City Mayor  
Mike Weston, King City Manager  
King City Council  
King City Planning Commission

City of King City  
15300 SW 116th Ave  
King City, OR 97224-2658

Submitted via email and mail

Re: King City Transportation Plan Survey Comments

This letter is in regards to the proposed East/West Circulation Alternatives Transportation Analysis which is Appendix B of the more comprehensive East/West Circulation Alternatives analysis that is being prepared as part of the Kingston Terrace Master Plan for King City, Oregon.

The Tualatin River National Wildlife Refuge (Refuge), part of the U.S. Fish and Wildlife Service (Service), was established in 1992 and officially opened to the public in 2006. The story of this Refuge is unique since it was proposed by local citizens who, witnessing the continual sprawl of Portland, urged the Service to create a wildlife refuge here to protect the wildlife and habitats in this portion of the Tualatin River watershed for future generations. It is a designated Urban Refuge, one of about 100 refuges throughout the nation so designated to bridge the divide between wildlife and their habitats and the public.

The Refuge has been a participant in the technical advisory group as part of the King City Planning process. As the Tualatin River is the lifeblood of the Refuge, we have always emphasized the importance of protecting open space, wildlife corridors, and creeks and streams feeding the Tualatin River. The Refuge has undergone several major restoration efforts with our partners. Most recently, we completed the restoration of Chicken Creek which connects to the Refuge and meanders through what is now 2 miles of wetland habitat before it connects to the Tualatin River. The restoration returned 280 acres of healthy habitat to the system. The 280 acres of restored wetland are directly adjacent to the King City Planning area, just on the other side of the river.

If the southernmost route is chosen and implemented, the environmental impacts, and specifically the impacts to resources protected in perpetuity by the Refuge in context and responsibility to the Tualatin River watershed, would be significant.

The planning efforts documented in the draft plan appear to be focused on moving residents from the east (current) portion of King City to the future western extension of King City in an alignment which would traverse multiple creeks and streams that are already eroding significantly as the creeks get closer to the river. As the Refuge can attest, having just restored a half mile long artificial ditch back into a 2 mile meandering creek, maintenance of infrastructure in a flashy river environment is highly problematic. The draft plan does not appear to contain nor refer to adequate BMPs that would be implemented to minimize degradation to riparian zones and the small tributaries that come off of the hillside.

The Refuge strongly recommends selecting an alternative that clearly results in transportation corridors with minimal impacts to natural areas, including protected areas and watercourses feeding the Tualatin River. Such an alternative would also mitigate water quality impacts. Areas remaining in a rural and natural state allow water to penetrate the substrate, thus significantly minimizing runoff and erosion. By contrast, development of these areas, particularly road creation, creates an impermeable substrate, resulting in nutrient overload and water runoff into the creeks and rivers in an already strained system. This degradation of water quality may in turn impact Steelhead populations and their habitat which are dependent on the Tualatin River. In addition, Olive-sided and Willow Flycatchers and Northern Red-legged treefrogs are three state species of concern found on various units of the Refuge including those Refuge units adjacent to the proposed transportation corridor. It is reasonable to presume those same species would currently be found in and around creeks in the proposed transportation corridor. By providing buffers around creeks and intact forest habitats in the proposed transportation corridor ensures the continued success of the listed species. Additional information regarding the importance of this area to aquatic species of concern is provided here: <https://nrimp.dfw.state.or.us/nrimp/information/streamflow/02willamette/02Streams.PDF> and <https://nrimp.dfw.state.or.us/nrimp/information/streamflow/02Willamette.pdf>.

We appreciate the opportunity to comment. Should you have any questions or concerns please reach out to me at 503-625-5944.

Sincerely,



Rebecca Gómez Chuck, Refuge Manager