



# Oregon

Tina Kotek, Governor

Department of Fish and  
Wildlife

Northwest Region  
17330 SE Evelyn St  
Clackamas, Or. 97015  
Phone: 971-673-6000  
Fax: 971-673-6070



June 14th, 2023

Mike Weston, King City Manager

King City Councilors

Jaimie Fender, King City Mayor

Submitted through email

Re: Kingston Terrace transportation plan

Thank you for the opportunity to comment on King City's transportation plan and in particular the proposed extension of Fischer Road through the property owned by Carla Bankston. ODFW provides technical expertise and input on a variety of proposed projects from restoration projects designed to benefit fish and wildlife to large development actions such as energy generation / transmission projects. ODFW's role is to provide technical guidance with the goal of avoiding and minimizing adverse impacts to fish and wildlife and their habitats. We also advise on how to compensate for unavoidable impacts. Our comments are based in the statutory authority given to us as defined in Oregon Administrative Rule (OAR), which includes ODFW's Fish and Wildlife Habitat Mitigation Policy (OAR Div. 415). The Department has reviewed the plan and provides the following preliminary comments and recommendations for consideration.

The Bankston Conservation Easement (CE) held by Columbia Land Trust is meant to preserve the habitat values of the site. It is ODFW's opinion that the condition from Metro, ordinance 18-1427 condition E. 8, has not been satisfied by the City. We recommend the other viable road options be more thoroughly considered including alternatives 3N or 4. The ecosystem services that the Bankston CE site provides must also be taken into consideration. Any development on this site will likely result in a loss of fish and wildlife habitat and ODFW recommends unavoidable negative impacts be mitigated consistent with current ODFW habitat mitigation standards (OAR 635, Division 415).

- OAR Chapter 635, Division 415 (ODFW's Fish and Wildlife Mitigation Policy found on ODFW's website at: [http://www.dfw.state.or.us/lands/mitigation\\_policy.asp](http://www.dfw.state.or.us/lands/mitigation_policy.asp) describes six habitat categories and establishes mitigation goals and standards for each wildlife habitat ranging from Category 1 (irreplaceable, essential, limited) to Category 6 (non-habitat).

We look forward to working with the City on this issue. Please let me know if you have any questions.

Sincerely,

Ariana Scipioni

Regional Habitat Biologist

[Ariana.r.scipioni@odfw.oregon.gov](mailto:Ariana.r.scipioni@odfw.oregon.gov)