



Environmental Science & Assessment, LLC

TECHNICAL MEMORANDUM

DATE: August 29, 2025

TO: Matthew J. Conser The Conser Group

FROM: Racine Robinson
Jack Dalton

RE: ESA Listed Species Assessment and Plant Survey - Stoltz Hills
Subdivision Lebanon, OR

This memo provides an environmental assessment of potential Endangered Species Act (ESA) listed species and habitat for the proposed Stoltz Hills Subdivision located at in Lebanon, OR (TL 122W16 2300 & 2305). This memo provides findings of a project site plant species survey and review of potential listed species within and immediately adjacent to the project site. This review uses the wetland delineation prepared by Branch Engineering Inc to Oregon Department of State Lands (DSL) defining the waters of the state/US (WD# 2024-0369).

Appendices

Appendix A Figures
Appendix B Additional Species List
Appendix C Vegetative Plot Data

PROJECT AREA HABITAT DESCRIPTION

Branch Engineering, Inc staff identified eight (8) wetlands totaling 15.4-acres and Oak Creek within the study area of the proposed subdivision (WD# 2024-0369). The remainder of the site is a planted ryegrass field.

Wetlands 1 – 7 are emergent wetlands located within the open field onsite. There is no tree or shrub canopy for most of each wetland, with an exception for Wetland 8 and the northern edge of Wetland 1. Overall, the herbaceous stratum is dominant, comprised of a monoculture crop of annual ryegrass (*Lolium multiflorum*) with presence of meadow foxtail (*Alopecurus pratensis*), tufted hairgrass (*Deschampsia cespitosa*), common velvet grass (*Holcus lanatus*), marsh meadow foxtail (*Alopecurus geniculatus*), toad rush (*Juncus bufonius*), spike rush (*Eleocharis sp*), soft brome (*Bromus hordeaceus*), sticky willie (*Galium aparine*), cut leaf geranium (*Geranium dissectum*), American vetch (*Vicia americana*), common dandelion (*Taraxacum officinale*), penny royal (*Mentha pulegium*), tall false fescue (*Schedonorus arundinaceus*), annual bluegrass (*Poa annua*), shiny geranium (*Geranium lucidum*), Canada bluegrass (*Poa compressa*), corn speedwell (*Veronica arvensis*), and slender beak sedge (*Carex authrostachys*) (V-1 -5, V-8).

Wetland 8 is a forested wetland located within the floodplain of Oak Creek. The canopy is comprised of Oregon ash (*Fraxinus latifolia*) and English hawthorn (*Crataegus monogyna*), with an understory of Douglas meadowsweet (*Spiraea douglasii*), Himalayan blackberry (*Rubus armeniacus*) and common snowberry (*Symphoricarpos albus*), and a sparse herbaceous stratum comprised of large-leaf avens (*Geum macrophyllum*), slough sedge (*Carex obnupta*), gray rush (*Juncus patens*), western meadow rue (*Thalictrum occidentale*), soft brome, and common velvet grass (V-6 & 7) (WD2024-0369).

The plant community within the upland herbaceous open fields is comprised of annual ryegrass monocultures, colonial bentgrass (*Agrostis capillaris*), false tall fescue, perennial ryegrass (*Lolium perenne*), and reed canarygrass (*Phalaris arundinacea*) (WD2024-0369).

According to the National Hydrology Dataset mapped by ODFW, the segment of Oak Creek within the project area flows northwest for 12 miles before there is a confluence with Calapoovia River.

USFWS REGULATED SPECIES and ODFW Oregon Fish Habitat Distribution

A list of ESA species potentially present within the project vicinity was obtained through the USFWS on-line Information, Planning and Conservation System (IPaC) (USFWS 2019). The USFWS Endangered Species Program lists a total of nine (9) threatened or endangered species potentially occurring within the project vicinity, including three bird species, one reptile species, three insect species, and two plant species (Table 1).

Table 1. Potential Impact to Listed Species from Proposed Action - IPaC Biodiversity Report & ODFW Fish Distribution				
<i>Species</i>	<i>Status</i>	<i>Species data – Critical habitat requirements</i>	<i>Expected impacts</i>	<i>Comments</i>
Northern owl (<i>Strix occidentalis caurina</i>)	Threatened	Old growth coniferous forests	Forest area in south, does not meet requirements for old growth. No habitat opportunity onsite	No impacts to species is projected as no critical habitat is present onsite.
Streaked Horned lark (<i>Eremophila alpestris strigata</i>)	Threatened	Open dry grassland	Open herbaceous land used for agriculture, no habitat opportunity onsite.	Open herbaceous land does not meet critical habitat requirements, no impacts projected.
California Condor (<i>Gymnogyps californianus</i>)	Endangered	Open prairie, savannah, foothills, rocky and forested	No habitat opportunity onsite.	No impacts to species is projected as no critical habitat is present onsite.

		mountain landscapes		
Fender's blue butterfly (<i>Icaricia icarioides fenderi</i>)	Threatened	Wet and upland prairie and oak savannah	No habitat opportunity onsite due to agricultural use.	No impacts to species is projected as no critical habitat is present onsite.
Monarch butterfly (<i>Danaus Plexippus</i>)	Candidate threatened	No critical habitat requirements.	Habitat opportunity onsite.	Open space will be maintained in the south and small pockets within the north. No projected impacts.
Suckley bumblebee (<i>Bombus suckleyi</i>)	Proposed endangered	No critical habitat requirements.	Habitat opportunity present onsite.	Open space will be maintained in the south and small pockets within the north. No projected impacts.
Kincaid lupine (<i>Lupinus sulphureus</i>)	Threatened	Wet prairie, upland prairie, and oak woodland	Open herbaceous land used for agriculture, no habitat opportunity onsite.	Open herbaceous land does not meet critical habitat requirements, no impacts projected.
Willamette daisy (<i>Eriogonum decumbens</i> var <i>decumbens</i>)	Endangered	Wet prairie, upland prairie, and oak woodland	Open herbaceous land used for agriculture, no habitat opportunity onsite.	Open herbaceous land does not meet critical habitat requirements, no impacts projected.

ORBIC

The Oregon Biodiversity Information Center (ORBIC) provided data for rare, threatened, and endangered plant, animal, and fungi records for a two-mile radius surrounding the proposed Stoltz Hills subdivision parcel. Two (2) ESA listed species from the five (5) element occurrence records were noted within this area, all of which were individual species occurring near the project area (Appendix B).

Table 2. Expected Impact to Wildlife from Proposed Action from ORBIC Report				
<i>Species</i>	<i>Status</i>	<i>Habitat Requirements</i>	<i>ORBIC Observations</i>	<i>Expected Impacts</i>
Winter steelhead (<i>Oncorhynchus mykiss</i>), pop. 33 Upper Willamette River ESU	Threatened	Streams and lakes	Observed in Santiam Canal in 2006, approximately 1 miles northeast of site. In 2010, fish passage to canal blocked.	Oak Creek is not mapped as ESH and there are no surface water connections between the two resources. No impacts proposed to Santiam Canal as part of this project.
Spring Chinook salmon (<i>Oncorhynchus tshawytscha</i>), pop. 23 Upper Willamette River ESU	Threatened	Streams and lakes	Observed in Albany Santiam canal in 2006, approximately 1 mile northeast of site. Classified as migratory use in 2009 by ODFW. In 2010, fish passage to canal blocked.	Oak Creek is not mapped as ESH and there are no surface water connections between the two resources. No impacts proposed to Santiam Canal as part of this project.

DSL does not map Essential Salmonid Habitat (ESH) within Oak Creek, however ESH is mapped within Calapooia River 12 miles northwest of the project area.

HABITAT ASSESSMENT

ES&A staff conducted a pedestrian survey on June 11th, 2025 of the entire site of ESA listed plant species as well as evaluate listed species habitat opportunities documented within the vicinity of the project area. Eight (8) vegetation plots were recorded at random locations adjacent to the eight wetland areas onsite to document the existing vegetative conditions of the wetlands.

The plant community onsite is dominated by herbaceous vegetation excluding the forested riparian area surrounding Oak Creek in the south of the site. No ESA-listed plant species (Willamette daisy, Kincaid lupine, Drooping bush, truffle species) were observed in or directly adjacent to site due to existing agricultural use and regular grass crop planting.

Overall, invasive and non-native graminoids and weedy forbs dominate the site. There is dense cover of non-natives of water foxtail (*Alopecurus geniculatus*), creeping bentgrass (*Agrostis stolonifera*), and annual ryegrass (*Lolium multiflorum*) as well as invasives such as common velvet grass (*Holcus lanatus*) and soft brome (*Bromus hordeaceus*). There are some native wetland species such as toad rush (*Juncus bufonis*) and Oregon bentgrass (*Agrostis oregonensis*), but most of the weedy forbs are invasive and non-native such as cut-leaf geranium (*Geranium dissectum*), shiny geranium (*Geranium lucidum*), marsh cudweed (*Gnaphalium uliginosum*), and mint (*Mentha pulegium*).

There is some scattered shrub cover onsite in the northeast along the property border and a forested riparian area in the south surrounding Oak Creek. The northeast has some cover of swamp rose (*Rosa pisocarpa*) but is mostly non-native with some cherry (*Prunus sp*) saplings

and invasive Himalayan blackberry (*Rubus armeniacus*). The forested southern area has a canopy of Oregon ash (*Fraxinus latifolia*).

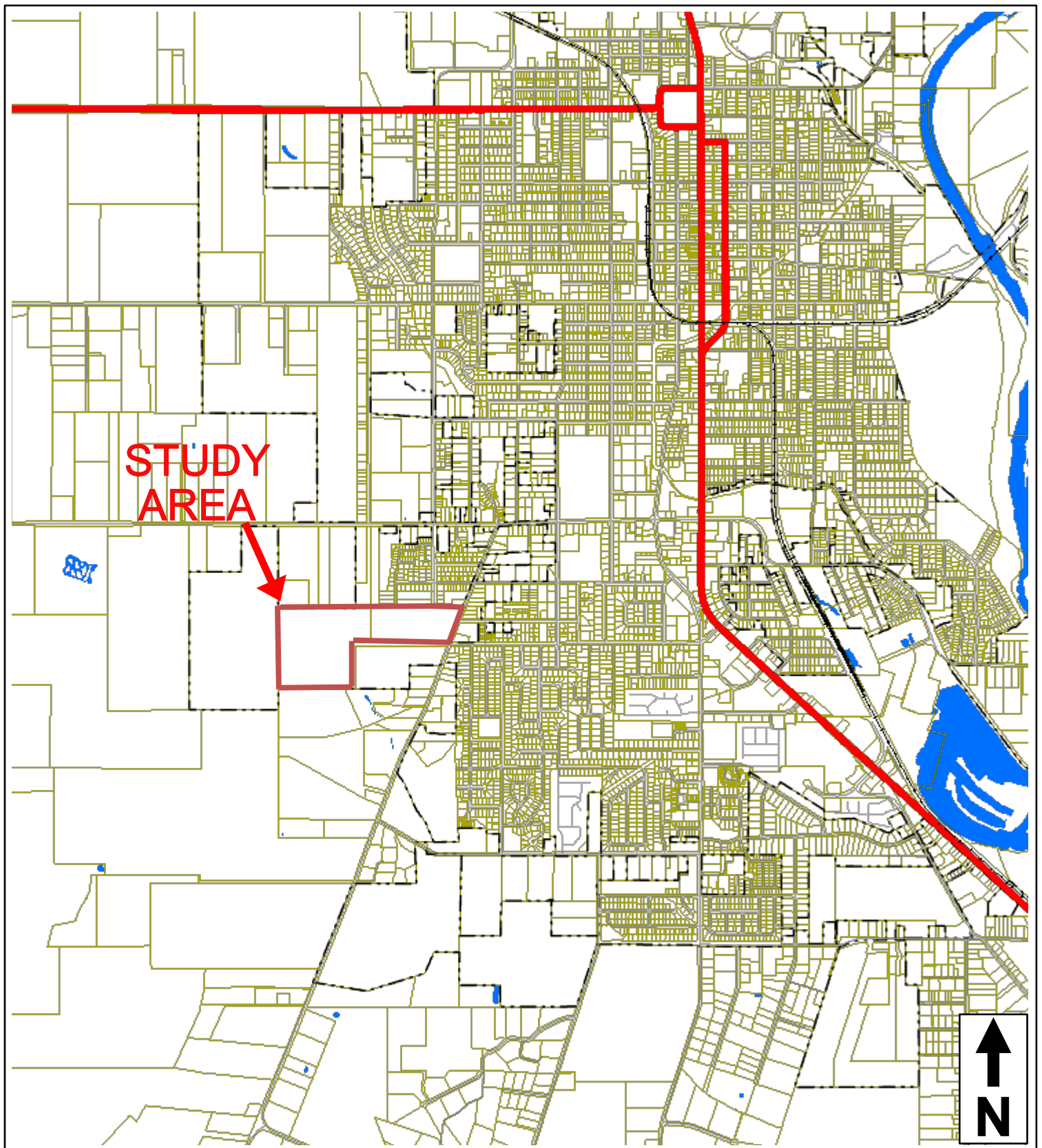
No habitat is present onsite for the northern spotted owl, streaked horned lark, or California condor. The forested riparian area in the south of the site is not coniferous old-growth forest and the wet prairie onsite is altered for agricultural use.

Because the wetland herbaceous areas are planted annually for agriculture, no habitat exists onsite for the endangered Fender's butterfly or the other candidate and proposed insect species in Table 1.

The species onsite within the Oak Creek riparian area (northwestern pond turtle, Freshwater mollusk, salmonid species, other fish species) will not be impacted by the proposed project as this area will be maintained as a separate protected tract in the proposed development. The City of Albany recorded a fish-passage barrier for the Albany Santiam Canal that restricts fish presence within the vicinity of the project area.

No listed ESA species were identified within the project area.

APPENDIX A. FIGURES



Source: Linn County Planning Application <https://gis.co.linn.or.us/portal/apps/webappviewer>

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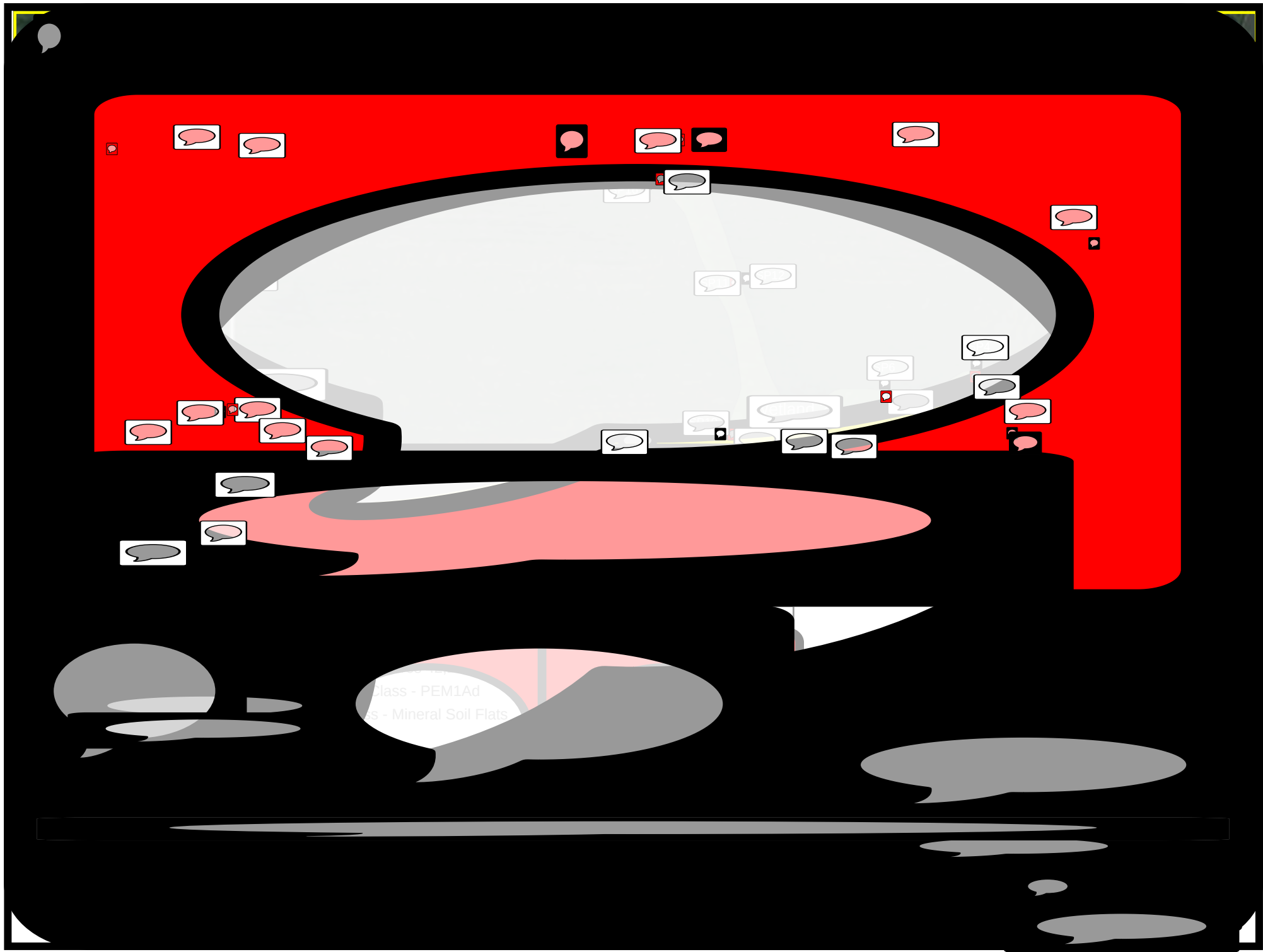


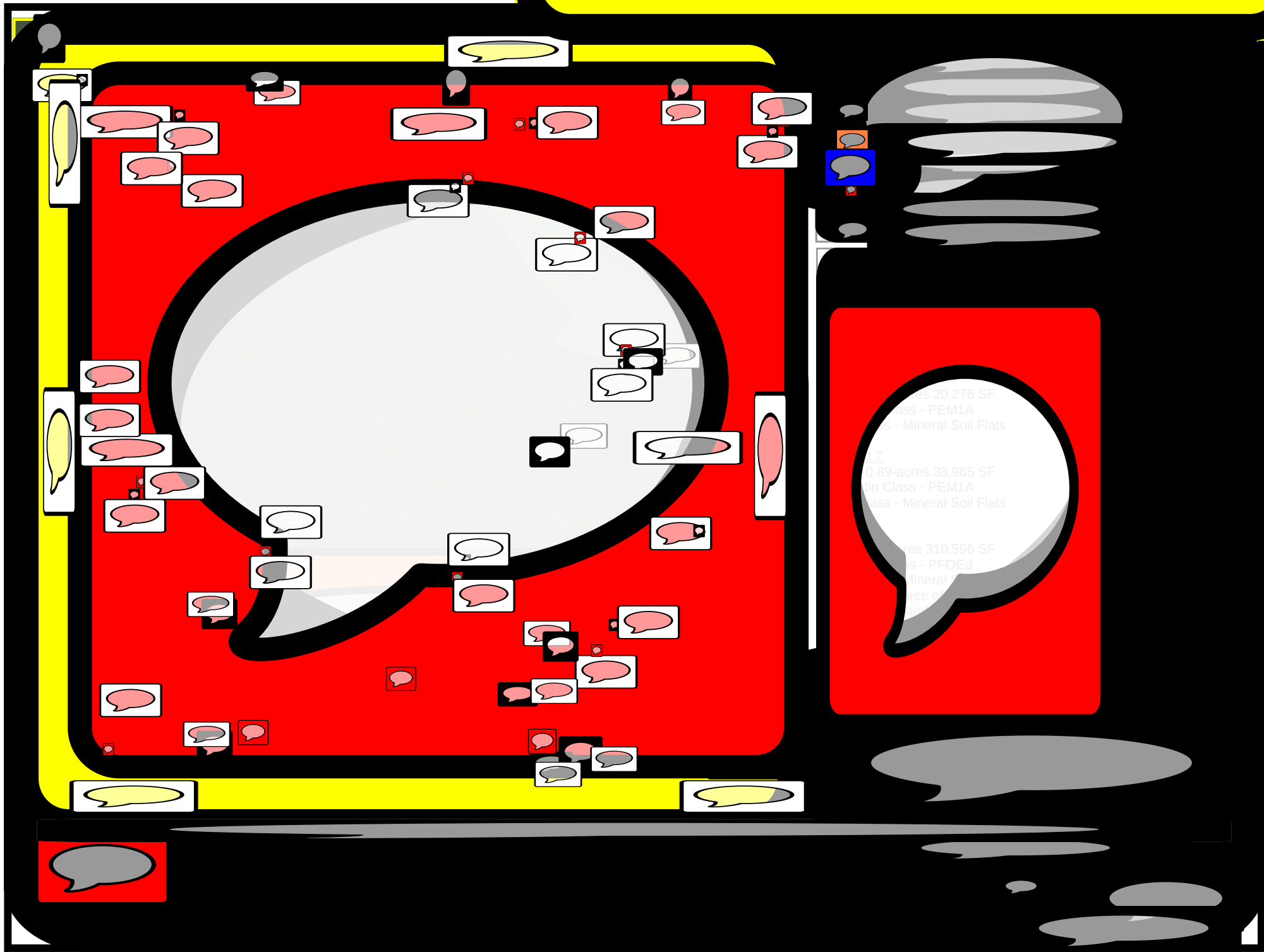
Vicinity Map Stoltz Hills Subdivision Lebanon, Oregon

Figure 1



0 mi 0.75 mi 1.5 mi

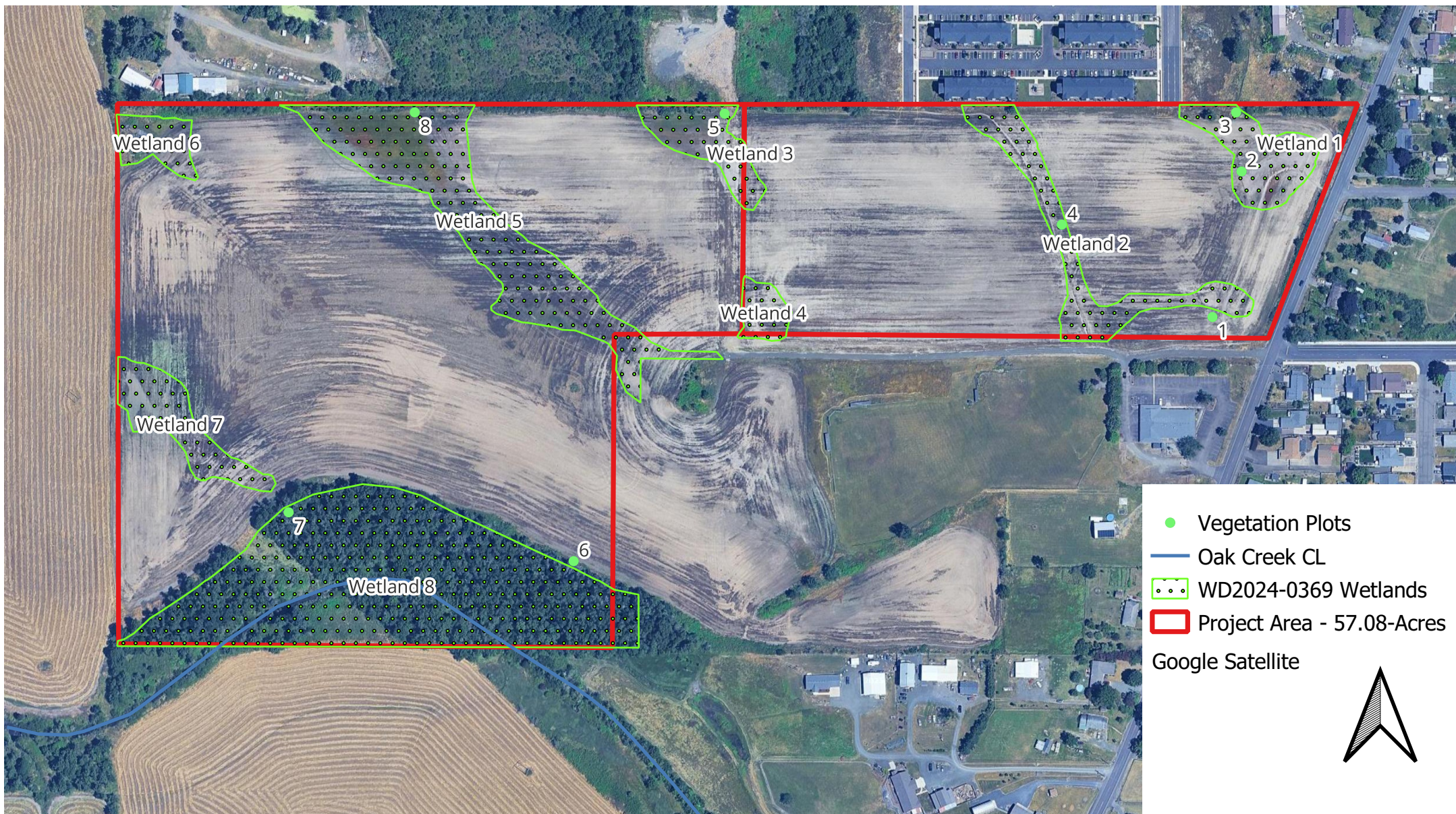




20,276 SF
Class - PEM1A
Mineral Soil Flats

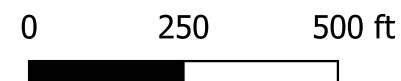
0.89-acres 38,965 SF
Min Class - PEM1A
Class - Mineral Soil Flats

310,596 SF
Class - PFOEd
Mineral Soil Flats



Vegetation Survey Stoltz Hill Subdivision Lebanon, OR

Figure 3



APPENDIX B. ADDITIONAL SPECIES

IPaC – Non-listed Species:

Northwestern pond turtle (<i>Actinemys marmorata</i>)	Species of Concern	Aquatic habitats and adjacent terrestrial areas (streams, lakes, ponds, wetlands, grasslands & woodlands adjacent)	Oak Creek onsite likely contains habitat, Oak Creek and wetland to be preserved onsite.	Existing habitat will be preserved onsite, no impacts projected.
Coastal cutthroat trout (<i>Oncorhynchus clarkia</i>)	Not listed	Streams & lakes	Mapped by ODFW as resident with multiple uses within Oak Creek onsite	Existing habitat onsite (Oak Creek) however no impacts to the resource are projected at this time.
Small-mouth bass (<i>Micropterus dolomieu</i>)	Not listed	Streams & lakes	Mapped by ODFW outside of project site, use unknown	No impacts are expected at this time.
Brown bullhead (<i>Ameiurus nebulosus</i>)	Not listed	Streams & lakes	Mapped by ODFW outside of project site, resident multiple uses	No impacts are expected at this time.

ORBIC – Non-listed Species:

Western pearlshell (<i>Margaritifera falcata</i>)	Species of Concern	Streams	Observed in 2003 in Lebanon ditch near River Road, 2 miles northeast of the project site. 2008 ODFW recorded spatial data for mollusk.	No surface water connections between Oak Creek and Lebanon ditch where species was observed. No impacts expected from proposed project.
Drooping bush (<i>Scirpus pendulus</i>)	Not listed	Marshes, wet meadows, swamps, roadside ditches	Specimen observed near Lebanon in 1936.	Habitat for the species exists onsite, areas of habitat will be preserved onsite in open spaces.
<i>Tuber quercicola</i>	Not listed	Oregon White Oak in warm, dry sites	Specimen observed at Peterson's Butte in 1987, 2 miles east of the project site.	No habitat for the species exists onsite, no impacts are projected.

APPENDIX C. VEGETATIVE COVER PLOT DATA

	V-1	V-2	V-3	V-4	V-5	V-6	V-7	V-8
HERBS								
Holcus lanatus	30	5	25	5	15	15	20	
Lolium multiflorum	70	20	20	40	15	30		25
Alopecurus pratensis	5							
Mentha pulegium					15			
Galium aparine			3					
Geranium dissectum			2			10		
Cirsium arvense								
Bromus hordeaceus			10		15	30	25	
Juncus bufonis	1	20		45				
Vicia americana					10			
Alopecurus geniculatus		60			2			15
Gnaphalium uliginosum				20				2
Schedonorus arundinaceus					10			
Eleocharis sp.	1							40
Leotodon saxatilis					15			
Agrostis stolonifera			40		5		25	
Geranium lucidum							15	
Lactuca serriola						5		
Thalictrum occidentale							5	
Camassia quamash							5	
Poa annua							15	
Triteleia hyacinthina							1	
Agrostis oregonensis								20
Total Cover	107	105	100	110	102	90	111	102
SHRUBS								
Rosa pisocarpa			10					
Prunus sp.			10					
Rubus armeniacus			5			15		
Fraxinus latifolia							10	
Total Cover	0	0	25	0	0	15	10	0
TREES								
Fraxinus latifolia							80	
Total Cover	0	0	0	0	0	0	80	0