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Chair Wheeler and Multnomah County Commissioners
501 SE Hawthorne Blvd.
Portland, Oregon 97214

RE: Rural and Urban Reserves

Dear Chair Wheeler and Commissioners,

Thank you for this opportunity to provide comments about Urban and Rural Reserves.

Last year, I was fortunate to be selected to serve on the Multnomah County Reserves Citizen Advisory Committee (CAC). I have also served for the last few years as my neighborhood's "point person" for both Reserves and for North Bethany.

Forest Park Neighborhood is located in the West Hills, wrapping around two sides of Forest Park, and bounded on the south and west by the Washington County line. The neighborhood includes areas inside the UGB and within the city of Portland, as well as large unincorporated rural areas outside the UGB. The neighborhood has active farm and forestry lands, extensive high quality wildlife habitat, and many healthy headwater streams on both sides of the West Hills. In 2002, two areas of our neighborhood were added to the UGB: Area 93 (Bonny Slope West) and Area 94 along Skyline Blvd. (the decision to add Area 94 to the UGB was overturned on appeal).

I started following the "Reserves" process very early, when the idea of Urban and Rural Reserves was being first considered at Metro. I was able to closely follow the development of SB 1011, its passage through the legislature, and development of the administrative rules.

The CAC's final Reserves recommendations are based on extensive data and thoughtful deliberations. The committee worked hard to understand the law and administrative rules, and to weigh technical reports, city input, and public comments. I believe these recommendations reflect the county's land use values, as well as the values of the citizens of the county, and I urge you to endorse them (with one small exception for the Laidlaw Road, adjacent to Area 93).

The main reasons behind the committee recommendations are not hard to understand – City of Portland told the committee that they didn't need Urban Reserves. The only good Urban Reserve candidate land in our county is Foundation quality farmland on the east side. The West Hills are so unsuitable for transportation infrastructure that they were not even "rated" for transportation. And we have outstanding Natural Features that define the region in the Sandy River Gorge, West Hills, and Sauvie Island. Those features almost all lie on Foundation or Important agricultural land.

CAC Suitability ratings and Overall Reserves Recommendations.

The CAC continued to receive important new information through our final meeting. Our time was limited and it wasn't possible to go back and revisit suitability ratings for individual areas, so we could only use the new information for our final Reserves recommendations. This resulted in a few overall Reserve recommendations that do not appear to be consistent with our suitability ratings. The most obvious example is Area 6. The Area 6 Rural Reserve suitability (part Low, part High) was decided at meeting #14 of 16. But the CAC's final recommendation was that all of Area 6 be designated Rural Reserve, demonstrating that the CAC found it all "suitable" in our final evaluation. Area 5, which is very similar, received a "High" Rural Reserve suitability rating at meeting #16 (in spite of earlier work that appeared to be heading towards a "Low" rating).

Two things in particular caused the CAC to rethink our approach at our last two meetings.

First, at our 15th meeting we were given revised instructions about how to use Rural Reserve factors 2a and 3a about "potentially subject to urbanization." The new instructions made it clear that the county has great latitude in how we interpret and weigh these factors. [see #1 in Background section below] This was a very significant change from previous staff instructions.

Then at our final meeting on July 30th, we were provided with an updated map for Natural Features. I think the new map made it clearer to the committee that the wildlife habitat across the West Hills had been extensively studied and found to be regionally significant.

Similarly, the factor ratings for all areas should be considered preliminary, and that information should be used only with great caution. The Overall Reserve Recommendations best represent the CAC's "final answer" about suitability.

Key Points about Urban and Rural Reserves [#s refer to Background section below]:

Rural Reserve Definition [#2]. SB 1011 says that Rural Reserve "means land reserved to provide long-term protection for agriculture, forestry or important natural landscape features that limit urban development or help define appropriate natural boundaries of urbanization, including plant, fish and wildlife habitat, steep slopes and floodplains."

The concepts of **scale** and **long term edges** are important. The CAC decided it was not appropriate to use Rural Reserves to protect individual stream corridors, for example, but that Rural Reserves should protect areas that urbanization should not cross, such as the Sandy River Gorge and the network of streams in the West Hills. [#3]

Timeline [#4]. According to SB 1011, Urban Reserves "must be planned to accommodate population and employment growth for at least 20 years, and not more than 30 years" of urban growth beyond the 20 year supply inside the UGB. So Urban Reserves will only contain a 20 to 30 year land supply. If the region grows as expected, Urban Reserves will be absorbed into the UGB in 20 to 30 years. Then the region will either return to the old UGB rules or define new Urban Reserves. This means that undesignated lands will be available for urban expansion long before Rural Reserves expire.

Trends. Changing demographics, rising energy prices, and Metro forecasts showing increasing numbers of households stretching to afford housing plus transportation all seem to favor walkable urban neighborhoods with access to good transit, preferably mass transit.

County Services Implications. I can't claim to be an expert, but it seems to me that access to good, frequent public transit will be critical for access to human services. Emergency services and public transit both depend on good road networks. So you might take an especially hard look at the transportation suitability of any Urban Reserve candidate area. The West Hills, for example, are so unsuitable for a road network that the area was "not rated" for transportation in the regional infrastructure assessment.

The county's ability to maintain roads and bridges could also be affected if development of new urban areas pulls public and private infrastructure funding away from existing urban areas. Constructing and maintaining upgraded rural roads in the West Hills is likely to be expensive.

Multnomah County Planning Commission:

- Endorsed the CAC's Overall Reserves recommendations with a few minor exceptions.
- Urged designating land as either Urban or Rural Reserves, and not leaving areas undesignated.
- Warned against "leapfrog" degradation of rural resources, where urban edges degrade adjacent rural resources, those degraded resources are then urbanized because their rural value is lower, which leads to degradation of the area adjacent to the new urban development, etc.

City of Portland. The CAC was told that the city believes that they can absorb 40 to 50 years of growth inside the existing city, and that they prefer to invest limited public and private funds in upgrading infrastructure and redeveloping areas inside the city to investing in new urban areas.

Washington County [#5]

- Their advisory committee has recommended broad Rural Reserves that stretch to the outer edge of the Reserves study area, including part of the southwest face of the West Hills.
- Additional urban development in Washington County areas north of Highway 26 will add significant traffic to Cornelius Pass Road and other rural roads in the West Hills. There are well understood safety issues for these roads, and this additional traffic would also impair the important wildlife corridors between Forest Park and the Coast Range.
- Development of the area between North Bethany and Cornelius Pass Road is likely to block a "pinch point" in the wildlife corridor on the southwest side of the hills.
- A November, 2007 county memo documents \$3.7B in Transportation Capital Needs. Over a 20 year period, these projects would require \$186M each year. Best case estimates, including a funding levy that hasn't been placed before voters, show \$100M in available funds "still considerably short of the annual requirement." The North Bethany funding plan documents \$289M needed for roads, but only identifies \$103M of funding. It is not clear that road improvements needed to serve existing Bethany and North Bethany will ever be built.

Key points about two areas where staff recommendations differ from the CAC's.

Lower Springville Road (adjacent to North Bethany)

The Great Communities study examined this area, and found that portions could be developed into a small community. However, the report makes it clear that the study team did not believe that urbanizing the area would be wise [# 7]:

“The team concurs that preservation of this important ecological area is likely more important to the region than urbanizing it, especially given the other constraints (lack of connectivity and developable land area) and significant opportunities (water quality and view).”

Points supporting a Rural Reserve designation:

- Metro and Oregon Court of Appeals have cited Abbey Creek, the powerlines, and the county line as forming a buffer between urban and rural uses (see the Background section for details). These elements form a defensible urban/rural boundary along the county line in the lower Springville Road area. [#6]
- The county's in-depth Goal 5 research and reports, wildlife habitat zoning overlays, and neighborhood documentation of elk (elk map and photos) in the area demonstrate that there is significant wildlife habitat here. [#8]
- The farmland along lower Springville provides an important buffer between the best wildlife habitat and urban Bethany.
- Greg Malinowski has testified that he is profitably farming in this area, he is investing in infrastructure and looking for additional land to expand his farm, and he wants to continue farming. The nearby urban area provides a built-in market.
- There is a county wildlife habitat overlay (SEC-h) over all of this area.
- There is a county significant stream overlay (SEC-s) across much of this area. About 40% of the area is in riparian corridors.
- Metro's 2006 Natural Areas Bond measure includes a Tier 1 target area for Rock Creek Headwaters that covers a large portion of this area.
- If left undesignated, Metro will still be able to add this area to the UGB in the future, even if there is no adjacent city to provide urban services.

Points opposing an Urban Reserve designation:

- “Not rated” for transportation – physical limitations for transportation due to the Tualatin Mountains and Forest Park are likely to still be there in 40 to 50 years.
- Washington County has not identified funding to pay for all the road improvements needed to serve existing Bethany area residents and new development in North Bethany. There is no “extra” road capacity planned that would be available for a new urban area in Multnomah County.
- Cost of building and maintaining upgraded rural roads in the West Hills to serve this area. Upgraded roads in the hills and additional traffic on those roads would harm wildlife and headwater streams.

- Several neighborhoods oppose development of this area. Additional traffic on constrained rural roads through Forest Park, including Cornell Rd, is a big concern.
- Development would require new bridges across streams and will bring other urban effects (impervious surfaces, loose pets, human intrusion) that are likely to degrade the regionally significant stream corridor and wildlife habitat. Once an area is “urban,” the priority for riparian corridors and other open spaces shifts to providing recreational resources for humans and adding bridges to “connect” neighborhoods that are otherwise separated by streams.
- A significant percentage (40%?) of the area is “constrained” land, making it likely that infrastructure will be less efficient and more expensive.
- Governance is doubtful. Candidate area is not adjacent to City of Portland, and Beaverton may not be able to annex areas up to the county line.
- Jim Emerson and I met with Beaverton’s Mayor Doyle, City Councilor San Soucie, and interim Community Development Director Steven Sparks. We were told that the city wanted Multnomah County to decide whether the Lower Springville Road area should be an Urban Reserve or not, and that if the county wanted the area to urbanize then the City of Beaverton would be happy to discuss governing the area. No one indicated that the city was requesting in Urban Reserve in this area. The city currently has a policy of not annexing areas unless 100% of property owners request annexation. I believe that this policy will limit the city’s ability to annex the Bethany area, making it difficult for the city to create an adjacent boundary that would allow them to annex and serve the Lower Springville Road area.
- Physical features making the area a poor Urban Reserve candidate (transportation rating, riparian corridors, impact on natural resources and nearby rural roads) are unlikely to change over time. Leaving this area “undesignated” would mean that we have avoided making a hard decision. Rural Reserve designation, while long lasting, is not permanent.

Areas 5 and 6: West Hills (a few key points not included in staff report)

- These areas, together with Area 7, include wildlife habitat and corridors that are critical to the health of Forest Park, the “crown jewel” of the regional parks system.
- Steep slopes, proximity to Forest Park, and difficulty in providing urban services didn’t deter Metro from adding Areas 93 and 94 to the UGB in 2002.
- There is a county scenic view overlay across the northeast side of the hills.
- Washington County preliminary recommendations include Rural Reserves across the southwest fact of the West Hills in Washington County, to the outer edge of the study area.

Conclusion

I hope that the Board will endorse the CAC's Overall Recommendations with just one small change.

As an individual (representing only myself), I agree with the staff recommendation that the area east of Bonny Slope West (Area 93) should be the top priority for Urban Reserves on the west side of the county. While this area scores very poorly for virtually all of the Urban Reserve factors, the value of connecting Area 93 to City of Portland so that Portland can annex the area and provide urban services outweighs the other considerations. But I believe that the area recommended for Urban Reserve should be made as small as possible because there is so little buildable land in this area (see attached maps). Making the urban area larger than necessary won't add enough homes to offset the additional infrastructure costs to serve them, and is likely to harm valuable headwater streams.

The CAC recommendations are also in accordance with letters from Forest Park Neighborhood, Hillside Neighborhood (Portland), Northwest District Association (Portland), and CPO-7 (Washington County, Bethany area) requesting Rural Reserves and no Urban Reserves north of Highway 26.

I also need to ask the Board to consider the 2002 UGB expansion candidate **Area 94**. The CAC recommended that it be included in a Rural Reserve. But because this area is inside the City of Portland, there is some controversy about whether the county can designate it as a Rural Reserve. I hope that if the city and county both agree that this land should be designated Rural Reserve that the many smart attorneys working for our governments will find a way to make it happen, but explicit Board support for a Rural Reserve may be needed to inspire the effort.

Please designate Reserves Study Areas 5, 6, and 7 as Rural Reserves to protect farm and forestry land, and important habitat for native wildlife. Only the small area east of Area 93 should be designated as an Urban Reserve on the west side. I also support the CAC's east county Reserves recommendations.

Rural Reserves don't offer perfect protection for wildlife habitat and riparian corridors, farm and forestry lands, but they will provide these important resources with long-term protection from their biggest threat -- urban development.

Thank you.

Sincerely,

Carol Chesarek

BACKGROUND INFORMATION:

#1: Potentially Subject to Urbanization. Dick Benner (Metro attorney) and Jim Johnson of Oregon Department of Agriculture have both said that these factors (2a and 3a) were included to ensure that Rural Reserves were used to protect areas threatened by urbanization. The concern was that a county might designate only lands far from the UGB as Rural Reserves, leaving all land near the UGB unprotected.

Clearly there is a range of interpretations allowed for these factors. To unravel them a bit, first note that these factors say “Are situated in an area that is otherwise potentially subject to urbanization during the applicable period” (underline added) – the factor doesn’t require that an area is subject to urbanization today, but asks if it is potentially subject to urbanization during the next 40 to 50 years if it is not protected with a Rural Reserve designation.

Here are a couple of helpful insights from Dick Benner:

‘The history of the factor in the rulemaking process indicates that it was intended to focus attention on land close to the UGB. A number of participants noted that designation as RR of land distant from the UGB would accomplish little good because it needs no protection from UGB expansion. Of course, “close” and “distant” are themselves vague terms. But the rule provisions to refer to three miles and the decision by the four local governments to study land generally within five miles of the UGB suggests that “close” has already been interpreted to mean three to five miles from the UGB.’

“I believe the rule may be interpreted this way: anything within our self-defined Study Area is “subject to urbanization.” It is, of course, not the only way to interpret it.”

Factor (2)(a) for farm and forest lands goes on to say “as indicated by proximity to a UGB or proximity to properties with fair market values that significantly exceed agricultural values for farmland, or forestry values for forest land;” This language does not appear in Factor (3)(a) for Natural Landscape Features.

The County Counsel memo dated July 23, 2009 says in part:

‘Natural Landscape Features: OAR 660-027-0060(3)(a) also requires consideration of a factor that addresses suitability for urbanization. In relevant part it provides:

“(3) Rural Reserve Factors: When identifying and selecting lands for designation as rural reserves intended to protect important natural landscape features, a county must consider those areas identified in Metro’s February 2007 “Natural Landscape Features Inventory” and other pertinent information, and shall base its decision on consideration of whether the lands proposed for designation: (a) Are situated in an area that is otherwise potentially subject to urbanization during the applicable period described OAR 660-027-0040(2) or (3).”

This factor differs from OAR 660-027-0060(2)(a) in that it does not identify “proximity” as an indicator for potential urbanization. However, proximity (actual distance, access distance and urban services functional distance) can be considered. Even if an area has a low potential for urbanization, a high ranking for other Rural Reserve designation factors could provide the necessary findings for a designation to protect features that, overall, define or limit well-planned urban growth.’

#1 (cont) and #2: The definition of Rural Reserve from SB 1011 says (underlining is mine):

“SECTION 1. As used in sections 1 to 4 of this 2007 Act:

- (1) “Rural reserve” means land reserved to provide long-term protection for agriculture, forestry or important natural landscape features that limit urban development or help define appropriate natural boundaries of urbanization, including plant, fish and wildlife habitat, steep slopes and floodplains.”

Further, The Purpose and Objective section (660-027-0005) in the administrative rules repeats this intention, and provides additional information (underlining is mine):

“Rural reserves under this division are intended to provide long-term protection for large blocks of agricultural land and forest land, and for important natural landscape features that limit urban development or define natural boundaries of urbanization. The objective of this division is a balance in the designation of urban and rural reserves that, in its entirety, best achieves livable communities, the viability and vitality of the agricultural and forest industries and protection of the important natural landscape features that define the region for its residents.”

The Definitions section (660-027-0010) provides further guidance:

‘(6) “Important natural landscape features” means landscape features that limit urban development or help define appropriate natural boundaries of urbanization, and that thereby provide for the long-term protection and enhancement of the region's natural resources, public health and safety, and unique sense of place. These features include, but are not limited to, plant, fish and wildlife habitat; corridors important for ecological, scenic and recreational connectivity; steep slopes, floodplains and other natural hazard lands; areas critical to the region's air and water quality; historic and cultural areas; and other landscape features that define and distinguish the region.’

The County Counsel memo concludes:

‘**CONCLUSION:** The interpretation of the Rural Reserves designation factors, each of which must simply be “considered,” gives the County and Metro a great deal of discretion. The Planning Commission and the Board of County Commissioners can be given a range of options within that discretion in which they balance rural values and protections with constituent concerns, as well as the need to come to a “meeting of the minds” in order to execute the required IGA with Metro.’

Clackamas County's analysis of factors 2a and 3a for Rural Reserves considers proximity to a UGB and whether the area has access to a highway. Washington County planning directors have recommended extensive Rural Reserves extending to the outer edge of the study area, including the southwest face of the West Hills.

One other related point worth noting:

- Factors 2a and Factor 4 (the “safe harbor” provision) both refer to “a UGB” – we are not limited to considering proximity or distance to the Portland metro UGB, any UGB can be used including those of cities outside Metro’s jurisdiction such as Scappoose or North Plains.

#3: Factor (3)(d) This factor for Rural Reserves for Natural Landscape Features reads: "Are necessary to protect water quality or water quantity, such as streams, wetlands and riparian areas;"

The committee received guidance that it was important to consider both scale and the purpose of this type of rural reserves to "limit urban development or help define appropriate natural boundaries of urbanization". The CAC decided that this factor was not intended to protect small stretches of creeks or small wetlands, but that we needed to consider whether it was important (for water quality and quantity) to stop urbanization short of a natural feature rather than including it in a new urban area and relying on Goal 5 and Title 13 to protect the feature. The standard that the CAC agreed on was "Is it important to stop urbanization short of this feature to protect water quality and water quantity?"

#4: Timelines for Urban and Rural Reserves. Section 6 of SB 1011 says :

"(4) Urban reserves designated by a metropolitan service district and a county pursuant to subsection (1)(b) of this section must be planned to accommodate population and employment growth for at least 20 years, and not more than 30 years, after the 20-year period for which the district has demonstrated a buildable land supply in the most recent inventory, determination and analysis performed under ORS 197.296."

Let's make a few simplifying assumptions. Assume that Metro decides in 2010 that the UGB already holds a 20 year land supply and does not need to be expanded. Assume that in 2010 the region decides to designate Urban Reserves to accommodate 20 years of growth, and that to meet that need 20 "units" of land are designated Urban Reserves (the average need being one "unit" of land per year). Further, assume that the region grows at the average rate. In that case:

In 2010, Metro would designate 20 units of land as Urban Reserves (UR).

In 2015, Metro would bring 5 units of UR land into the UGB, leaving 15 units in Urban Reserves.

In 2020, Metro would bring 5 units of UR land into the UGB, leaving 10 units in Urban Reserves.

In 2025, Metro would bring 5 units of UR land into the UGB, leaving 5 units in Urban Reserves.

In 2030, Metro would bring 5 units of UR land into the UGB, leaving 0 units in Urban Reserves.

By 2035 the region would have no more Urban Reserves, and would need to decide whether to designate new Urban Reserves or use the old UGB expansion rules.

But the applicable period for Rural Reserves designated in 2010 would be 40 years, until 2050. So only lands not designated as Rural Reserves could be brought into the UGB or designated as new Urban Reserves in 2035.

This means that undesignated lands could be brought into the UGB or designated as Urban Reserves 15 years before Rural Reserve designations expire. And there is no restriction on when additional Urban Reserves can be designated – the region could choose to designate additional Urban Reserves at any time. While it is doubtful that the region would do so any time soon, it might be prudent to designate additional Urban Reserves before the first set are consumed to avoid speculation around the urban edge.

Undesignated areas near neighboring cities (outside Metro's jurisdiction) can be added to those city's Urban Reserves or UGB. Rural Reserve areas cannot be added to any Urban Reserve or UGB.

#5: Washington County Transportation Funding.

The November, 2007 memo is available on page 58 of the North Bethany Funding Plan, which is available online:

http://www.co.washington.or.us/LUT/PlanningProjects/Bethany/upload/NB_funding_strategy_02-23-09_PRINT.pdf

#6: Boundaries and buffers (Rural Reserves factor 3f)

In Areas 6 and 7, Abbey Creek, the powerlines, and the county line have been cited by Metro and the Oregon Court of Appeals as forming a buffer between urban and rural uses.

These elements, together with the powerline corridor extending east of North Bethany that is supported by another riparian corridor along the UGB south of Springville Road, provide an appropriate buffered edge for a Rural Reserve.

Exhibit C to Metro Ordinance No. 02-987A FOR THE PURPOSE OF AMENDING THE URBAN GROWTH BOUNDARY TO ADD LAND IN THE BETHANY AREA, adopted December 12, 2002 says:

“The inclusion of all of areas 84-87 allows Abby (sic) Creek and the adjoining riparian zone to form a natural buffer separating the Bethany area from the resource land and existing rural neighborhoods to the north, and it utilizes the powerlines and also the Multnomah County line as clear demarcations along the expansion area’s eastern border.” (page 2)

“The Bethany expansion area will have clear boundaries that serve to both visibly highlight the line separating urban and rural uses, and to also serve as a buffer between urban development and rural uses. NW 185th Avenue, Abby (sic) Creek and its adjoining riparian zone and slopes and the powerline easement coupled with the Multnomah County boundary line all serve to clearly demarcate and buffer the proposed expansion area.” (page 9)

These same elements were also cited as buffers in the Oregon Court of Appeals decision affirming the North Bethany UGB expansion area (text is paraphrased from an email from Jim Emerson to Chuck Beasley on April 16, 2009):

Case # A122169 (which decision was consolidated with case #'s A122246 and A122444,) “City of West Linn et al V. LCDRC et al” was decided by the Oregon Court of Appeals on September 8, 2005. In affirming the inclusion of Areas 84-87 (North Bethany) into the UGB, the Court said: “The Bethany expansion area will have clear boundaries that serve to both visibly highlight the line separating urban and rural uses, and to also serve as a buffer between urban development and rural uses. NW 185th Ave., Abby (sic) Creek and its adjoining riparian zones and slopes and the powerline easement coupled with the Multnomah County boundary line all serve to clearly demarcate and buffer the proposed expansion area.”

#7: Great Communities Report

The regional Great Communities study included a large section of the West Hills, including the Lower Springville Road area. This “Northwest Hills test area” is referenced in three places in the summary report:

“1. Community Design

... The Northwest Hills test area is a good example of an area in which it would be difficult to create the level of connectivity required for communities with great design. The topography makes it necessary to build many costly bridges between isolated centers to create any level of connectivity. In addition, the presence of Forest Park and the West Hills may give the area stronger value for the region to remain if it remains as is.”

“3. Ecological Systems

... In the Northwest Hills area for example, the buildable lands map revealed a major riparian system that feeds the Tualatin River as well as numerous riparian corridors within the rolling rural landscape. This ecological web modulates the landscape and defines potential development spaces. The team concurs that preservation of this important ecological area is likely more important to the region than urbanizing it, especially given the other constraints (lack of connectivity and developable land area) and significant opportunities (water quality and view).”

“5. Governance

...An example of the issue involved in the application of the governance criterion is the Northwest Hills area. Of the three test areas, the Northwest Hills faces the greatest challenge for governance. Although the area is located in Multnomah County, its strongest connection to an existing community (and the accompanying services) is in Washington County and, more specifically, the City of Beaverton. While governing and providing services to this area in the future is possible through intergovernmental agreements, annexations, and creatively-financed infrastructure, it is significantly complicated by the fact that there is not one governing body that can easily provide the core urban services needed to create a Great Community in that area.”

#8: Natural Features Inventory and related County reports

The Natural Features Inventory map is not the only indicator of whether natural features are present in an area. The Natural Features Inventory is focused on wildlife habitat and riparian areas. It makes no effort to include “sense of place” features, most notably scenic views but also recreational, historical, and cultural resources.

The map itself includes a note saying that the map “is to be used as a guide ... and not to be used on a site by site analysis. Individual sites will need separate assessment beyond this landscape overview.” So “holes” on the map do not necessarily indicate that an important natural landscape feature is not present. Where there is other credible data about natural features, that data should be considered.

This is especially relevant in the West Hills, where the county did extensive research for its Goal 5 Reconciliation Report and West Hills Rural Area Plan. The Reconciliation Report makes use of at least two detailed studies of wildlife habitat in the West Hills, including one which analyzed transects through the area. These reports find that all of the West Hills are significant wildlife habitat except a small area in Bonny Slope.

Elk, for example, use both open fields for fodder and forest canopy for cover. Forest Park Neighborhood Association has documented elk using the open fields in Area 6 and Area 7 where there are “holes” in the Natural Features Inventory. This neighborhood documentation reinforces the validity of the county assessment of the wildlife habitat in the area, and the county wildlife habitat overlays that extend across almost all of the West Hills.

Here are some quotes from these county reports that document the value of this wildlife habitat in the West Hills (underlining is mine):

From the Multnomah County West Hills Reconciliation Report Revised – May 1996:

Page V-9,10,11 (Wildlife Habitat):

“Finally, the West Hills’ relationship to Forest Park is critical to the West Hill’s significance... Forest Park, in isolation, is not large enough to support self-sustaining populations of medium and large size mammals, such as elk, bobcats, mountain lions ... and black bears [footnote: the implication is not that Forest Park should be managed exclusively for bear and elk; rather, the point is that managing Forest Park and the adjacent wildlife are for bear and elk will ensure sufficient habitat for smaller mammal and bird species that reside in the Portland region.] for which hundreds of square miles of habitat would be required.

...

Thus it is the quantity of the West Hills Wildlife Habitat Area in relation to its quality and location that are critical to this inquiry. High quality habitat elsewhere in Multnomah County cannot substitute for even medium quality habitat in the West Hills. It is because medium quality habitat is limited, and threatened by conflicting uses at a particular location, that makes the West Hills a significant Goal 5 resource.

The environmental consequences of losing a small amount of West Hills wildlife habitat in certain locations are much greater than losing a great deal of habitat in other portions of Multnomah County. Simply put, loss of the prime wildlife habitat in the West Hills threatens the connecting link between Forest Park and the thousands of acres of wildlife habitat in the Coast Range.

From the county's West Hills Rural Area Plan:

"WILDLIFE HABITAT

Wildlife Habitat has been identified as a significant Goal 5 resource in the West Hills. All of the West Hills, excepting a small area consisting of the Bonny Slope subdivision along Laidlaw Road and adjacent areas, has been determined to be significant wildlife habitat, because it is all part of an ecosystem which supports a diverse wildlife population relatively undisturbed by the rural levels of development in the West Hills. This ecosystem is part of a larger system which includes Forest Park to the south and east and natural areas in Washington and Columbia Counties, stretching eventually to the Oregon Coast Range, on the north and west. Forest Park is especially dependent upon a natural connection to the West Hills in order to retain the diversity of wildlife which makes the park a unique recreational facility not only in Portland, but throughout the United States. It should be noted that the Balch Creek area is also an integral part of this wildlife habitat resource, because it is adjacent to Forest Park and is also close to the Portland metropolitan area, and also because it has been demonstrated by the City of Portland that it has significant wildlife habitat values. The existence of the Portland Audubon Society lands and other adjacent parcels owned by the Oregon Parks Foundation are testament to Balch Creek's wildlife habitat value."
