

# The Forest Park Conservancy



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September 9, 2009

**To:** Ted Wheeler, Chair, Multnomah County Board of Commissioners

**CC:** Multnomah County Board of Commissioners, Metro Council, Reserves Steering Committee

**From:** Forest Park Conservancy

**Re:** Urban and Rural Reserve Candidate Areas 5, 6, & 7

The Forest Park Conservancy would like to submit comments related to your decision regarding urban and rural reserve candidate areas 5, 6 and 7.

Our primary concern is to see long-term protection for the natural landscape features situated in close proximity to Forest Park. These areas contain important wildlife habitat and headwater streams that are critical to the long-term ecological health and biodiversity of Forest Park, and also represent important ecological connectivity with the Coast Range. For these reasons, we support the recommendations of the citizen's advisory committee to establish rural reserves in these areas, and believe that clear language in support of this position can be found in State law OAR 660-027.

In designating urban and rural reserves, Metro and the Counties must apply several factors identified in State law OAR 66-027 relating to ecological systems and natural landscape features. The purpose and objective statement (660-027-0005) of the law includes the following language:

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.

In section 660-027-0010, "important natural landscape features" are defined as:

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.

We believe that if the law is applied, significant portions of areas 5, 6, and 7 would be deemed suitable and appropriate for rural reserve designation.

State law also requires the use of Metro's February 2007 Natural Landscape Features Inventory (NLFI) and other pertinent information in making these decisions. The NLFI identifies the general location of natural features but not the relative suitability for urban or rural reserve designation based on the factors.

In order to apply the factors in OAR 660-027 and designate urban and rural reserves, Metro and the Counties must identify the relative suitability of important natural landscape features for designation as urban and rural reserves. While the NLFI does not assess relative quality, it does contain component layers identifying particularly unique wildlife habitats and corridors that are conservation priorities within the Metro region and within the Willamette Valley. As such, the NLFI does contain the necessary technical information to identify the relative suitability of some lands for inclusion in urban and rural reserves. In the NLFI, unique wildlife habitats and corridors are clearly identified in the vast majority of candidate areas 5, 6 & 7.

The Forest Park Conservancy supports the establishment of rural reserves in areas 5, 6 & 7. However, regardless of their ultimate designation, we want to reiterate the importance of protecting the natural landscape features contained within these areas.

Thank you for your consideration.

Sincerely,



Michelle Bussard  
Executive Director  
Forest Park Conservancy



Stephen Hatfield  
Stewardship Director  
Forest Park Conservancy