

Jerry Grossnickle
13510 NW Old Germantown Road
Portland, OR 97231

August 23, 2016

Chair Deborah Kafoury
Commissioner Jules Bailey, Commissioner Loretta Smith, Commissioner Judy Shiprack,
Commissioner Diane McKeel
Multnomah County Board of Commissioners
501 SE Hawthorne Blvd., Suite 600
Portland, OR 97214

Re: Multnomah County Comprehensive Plan update
Planning for Habitat Protection and Recreational Opportunities

Dear Chair Kafoury and Commissioners:

I served as a member of Multnomah County's Community Advisory Committee for the Comprehensive Plan update and on its Air, Land, Water, Wildlife and Hazards subcommittee. I also served on Metro's North Tualatin Mountains Stakeholder Advisory Committee. During the period of these deliberations, I also served as President of Forest Park Neighborhood Association and now serve as Chair of its Land Use Planning Committee.

Having read Metro's August 4 comments to the Board of Commissioners, I feel compelled to add my own perspective on language in the Comprehensive Plan that seeks to accommodate both wildlife habitat protection and recreational opportunities in the county's natural areas.

The Comprehensive Plan should recognize that there are natural areas within the county that are not suited to a typical "balancing" formula, where recreational opportunities and wildlife resources are seen as equal goals on the same lands. One of these natural areas is in Metro's North Tualatin Mountains acquisition properties north of Forest Park.

It is disappointing to me that Metro would like to strike "to ensure wildlife connectivity" from the Plan's description of these lands, despite the fact that Metro explicitly relied on this goal when promoting the bond measures that provided funding for the acquisition. The CAC recognized that these lands were particularly important to the health of the natural areas of the West Hills not only for their habitat values, but also for their strategic location, and we very deliberately included the "to ensure wildlife connectivity" language in our draft to reflect that fact.

And indeed, these properties were selected by Metro because of their critically important location within the narrow forested neck that connects the West Hills to the larger natural

habitats of the Coast Range. Of course Metro should be able to describe its own reasons for purchasing the North Tualatin Mountains properties, but the CAC wanted to make sure that the Multnomah County Comp Plan acknowledges that one of the central reasons for preserving these particular natural areas is to preserve the wildlife corridors and connections that the West Hills area has to the Coast Range and its wildlife habitat. I recommend that this or similar language be retained in the Comprehensive Plan. It is important to the CAC, to Forest Park, to the Forest Park Neighborhood Association, to the residents of the West Hills, and of course to the wildlife of the West Hills, that these wildlife corridors and connections are protected, for they are important to the health of wildlife (both plant and animal) in all the remaining natural areas of the West Hills that depend on renewal and migration to and from the larger Coast Range habitat lands.

With this idea in mind, but also knowing Metro is planning to provide for some level of recreation on these lands, the CAC was deliberate in its choice of language. The CAC did not wish to prohibit recreational development, nor could we agree that the Sauvie Island (SIMC) formulation was completely applicable, so after considerable discussion we decided on wording that we think strikes the right balance between protecting natural areas and providing for recreational development in the West Hills. I believe that the additional tweaking by the Planning Commission ("complementary to" became "consistent with") did not significantly weaken our recommendation:

(8.8) Support only those recreational activities within the West Hills area that are *consistent with*, and do not cause *undue negative* impacts on, natural and environmental resources identified in Goal 5. (italics added)

Metro objects to our language, and would change "consistent with" to "compatible with" and would change "undue negative" impacts to "significant" impacts.

In my opinion Metro's suggestions do not improve the formulation and provide no discernible standards.

I have read the August 19 letter by Mark Greenfield and the August 21 letter written by Carol Chesarek and applaud their comments on this section, and in particular, I believe that the clarifying language offered by Ms. Chesarek would be a helpful addition to the Comprehensive Plan's discussion of balancing recreational use with protection of natural resources (after second bullet of "Key Planning Issues and Supporting Information", page 8 of Section 8):

"In the subarea policies for SIMC and West Hills, while a high bar is intended for recreational development in Goal 5 resource area, opportunities to enjoy Goal 5 resources may be allowed. When there is a conflict between conserving, restoring and enhancing resources and providing for enjoyment of them, the conservation, restoration and enhancement are to be predominant."

Finally, in order for the Comprehensive Plan to provide a better framework for making sound decisions that appropriately balance natural resource and recreational use, there

should be an explicit recognition of the fundamental fact that some environmentally sensitive areas must be given a higher level of protection than other natural resource lands, and that recreational development in these areas should be subject to greater scrutiny.

While the paragraph mentioned above (the second bullet of Key Planning Issues, page 8 of Section 8) does point out that for recreational facilities located within environmentally sensitive areas, it is important to balance recreation needs with natural resource management and protection objectives, particularly for riparian areas and wildlife habitat, there is no specific policy or strategy that describes how such balance is to be achieved. Ms. Chesarek's suggested addition helpfully provides that when there is a conflict between Goal 5 resource protection and recreational development, resource protection should predominate.

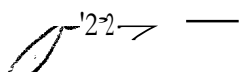
A further common-sense refinement could be that the Comp Plan explicitly state that **the greater the environmental significance a natural area has, the greater the scrutiny a recreational development in that area should have.** This analytical framework would have helped Metro's North Tualatin Mountains Stakeholder Advisory Committee in our deliberations on the recreational development vs. environmental protection issues that were often the primary focus of our SAC meetings. In the end, the Committee's recommendations did in fact give greater scrutiny to recreational proposals that were in more environmentally sensitive areas, and Metro dropped some of its initial proposals as potentially too damaging. But truth be told, we reached these results not because of rigorous analysis, but largely as a result of an emotionally fraught political process.

It would have been helpful to have had a cogent set of guidelines. I think the proposed Multnomah County Comprehensive Plan update shows considerable evidence that the CAC and county staff seriously considered the many complex issues of land use planning in our natural areas, and I congratulate everyone involved for a job well done. But improvement is always possible. I urge the Board of Commissioners to further improve the county's guidelines by adding the following language to the Comp Plan as **Strategy 8.8-1:**

Strategy 8.8-1 Ensure that a higher level of scrutiny is given to recreational development in environmentally sensitive areas; the greater the environmental significance a natural area has, the more important it is to limit the scope of recreational development in that area.

Thank you for your consideration of these suggestions.

Sincerely,


erry Grossnickle