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Testimony on the Metro North Tualatin Mountain applications

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February 3, 2023

Multnomah County Planning Commission

Multnomah County Land Use Planning

1600 SE 190th Avenue

Portland, OR. 97231

Submitted by e-mail to: lup-hearings@multco.us

Re: Testimony on the Metro North Tualatin Mountains applications

Case No. T3-2017-9165 / T4-2017-9166

Dear Chair Ingle and Planning Commissioners:

Thank you for the opportunity to provide testimony about two associated proposals submitted to you by Metro.

As noted in the application: the first is an application for a **Quasi-Judicial Plan Revision to the Multnomah County Comprehensive Plan to designate a local park.**

The second proposal is for a **public nature park project in a portion of Burlington Creek Forest.** This includes applications to develop recreational trails, restrooms, trail bridges, parking, and related amenities in a portion of the Burlington Creek Forest.

At the outset of my testimony, I would like to say that building the numerous shared-use additional trails that Metro is proposing has multiple severe impacts: such trail building and use by fast moving cyclists will compromise soil and water quality and the wildlife habitat values of these exceptional natural area sites

Exhibit D.113

that were purchased with tax-payer dollars to protect native wildlife and the critical wildlife corridor that extends along Tualatin Mountain, from Forest Park to the Coast Range of Oregon. Using the existing gravel roads in the area to provide access for recreation would allow a sufficient compromise, blending recreational needs with essential protection for declining wildlife and amphibian populations, as well as offer protection to the site's important headwaters. Further, the proposed trails do not take into account the 2019-2023 Oregon Statewide Outdoor Recreation Plan (SCORP) goals for equity, diversity, and inclusivity.

My concerns with the proposals are five-fold.

1. **I was a member of the Citizen Advisory Committee (CAC) for the Multnomah County Comprehensive Plan. The application by Metro does not agree with the defined intent of the Multnomah County Comprehensive Plan.**

We, as CAC members, spent countless hours discussing policies specific to protecting wildlife in northwest Multnomah County. Our task was to help define how to “protect significant native fish and wildlife habitat and wildlife corridors and specifically limit conflicting uses within natural ecosystems and sensitive big game winter habitat areas.”

Unfortunately, Metro's Burlington Creek SCP (Exhibit A.3, page 100 of the PDF) states : “A thorough ecological inventory and assessment has not been done for the site. Listed and rare species, such as Chinook salmon (juvenile Chinook salmon were detected during fish surveys on Burlington Creek Forest in 2012), northern red-legged frog and others almost certainly occur in Burlington Creek Forest. Coho and winter steelhead are present in lower Burlington Creek Forest.” Which leads to #2:

2. **There are no goals or conservation targets for wildlife in any of these SCPs.**

Without these studies or knowledge, native wildlife face another barrier to their survival. Many bird species, for example, are facing devastating declines. *The United States and Canada have lost 3 billion birds since 1970.* To give them a chance for survival in the next fifty years, it is essential to maintain large sections of undisturbed natural vegetation and corridors to accommodate animals' seasonal movements

and requirements. The act of building multiple off-road trails that crisscross this native area, many on steep slopes, compromises the health and cohesion of Burlington Creek Forest by segmenting the crucial natural habitat into narrow, isolated sections for wildlife.

3. The application is seriously outdated. It does not comply with either the original goals of protection of wildlife habitat nor the

current goals around trail accessibility. It has not resolved concerns raised about impacts on water, soil, and wildlife raised during the

original development of the plan by ODFW and Multnomah County Soil and Water Conservation District.

4. ODFW has identified that there are significant numbers of sensitive Northern Red-Legged Frogs that migrate across

Burlington Creek Forest in large quantities. Oregon Department of Fish and Wildlife has expressed concern that heavy

recreation use could impact this species and populations could suffer further decline.

5. Metro's current application is strongly focused on building trails that are heavily biased towards off-road biking, at the

exclusion of other recreational needs and user groups.

The 2019-2023 Oregon Statewide Outdoor Recreation Plan (SCORP), entitled *Outdoor Recreation in Oregon: Responding to*

Demographic and Societal Change, has determined that the most underserved populations are the middle old, Asian, the

young old, Latino, and low income populations. SCORP states that recreation providers consider the needs of these underserved

demographic groups in their planning efforts. Top recreational needs are to develop walking / hiking trails closer to home – the most

important action for families with children, low income, persons, young old, middle old male and female populations—and to provide trails for the disabled. None of these factors appears to have been considered in the trail system being proposed, therefore the current plan seems to ignore the need for inclusivity, diversity, and equity according to SCORP Oregon goals.

While I greatly appreciate the work and effort of the scientists and staff involved in this planning effort for these two proposals, I adjure you to consider in your deliberation the serious problems that I have raised.

Very truly yours,

Marcy Cottrell Houle