



LUP Hearings <lup-hearings@multco.us>

North Tualatin Mountains Park

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To Multnomah County Board of Commissioners.

My name is John Chen. I am a new member of the Multnomah County Planning Commission but in this matter I am strictly providing input as a citizen and neighbor. I was not on the Commission in the spring when the proposal came to the Commission for consideration, but I did give input to the Commission, again as a neighbor and citizen.

You will be deciding on whether to approve Metro's proposal for a nature park and specifically the building of multi-use trails in the section known as Burlington Creek Forest. You will also note that the Commission voted on 3/6/23 to approve Metro's proposal 4-3 with 2 absences. You may or may not know that ODFW submitted testimony on 3/23/23 with multiple concerns regarding Metro's proposal. This information was not available to the Planning Commissioners at the 3/6/23 meeting. At the 4/3/23 meeting, the Planning Commissioners were notified that ODFW had submitted additional testimony but the Commissioners were not given the content of that testimony. That would only be available if the group decided to re-open the hearing process. Ultimately the Commissioners chose not to re-open the hearing process as there would have been an additional 2 months delay. In short, this input from one of the most credible and important voices was not considered by the Planning Commission and we won't know how the vote would have gone if that information was available.

I have copied and pasted a few select sections from ODFW's testimony:

"ODFW is concerned that the approval of this conditional use of new multi-use trails in this area has the potential to adversely affect natural resources and that the mitigation proposed by Metro will not compensate for those impacts." p. 3

"ODFW suggests avoiding any trail placement in the lower elevations in the blue highlighted area in Figure 1 below to reduce adverse impacts to RLF upland non-breeding habitat." p.4

"Metro's current proposal to reduce adverse impacts is greatly appreciated, but, in ODFW's opinion, does not sufficiently address adverse impacts that will likely result from increased trail density, such as modifications to frog migratory behavior, and other direct and indirect negative impacts described above." p. 6

"ODFW recommends a thorough ecological inventory and assessment be performed **before** approval of the Conditional Use permit" p. 7 (bold is mine)

"In summary, ODFW finds the project, as proposed, to have adverse (negative) impact and thus may not meet the Conditional Use criteria (County Code § 36.6010 (B) and Policy 8.8)" p. 7

Some have called the local community's concerns NIMBYism. On the contrary, I welcome more parks, especially ones closer to the main city. It's a challenge to find a place to walk on a sunny weekend day. One either has to get up early for a parking spot at one of the Forest Park trailheads or drive 45 minutes to a hour out of town. My concern is Metro's plans to put in additional "multi-use trails." There is already a graveled road that is about 3.5 miles that could easily accommodate a higher traffic of walkers, equestrian and bikers. It's wide and easy to see around the bends so that a shared path is safe. The proposed "multi-use" trail will not be used by walkers (much less equestrians) as no-one in their right mind is going to walk up a 30 inch wide trail while a mountain biker is careening down the hill. Moreover, there are established walking trails in the Ancient Preserve that FPC owns. Lastly, if we really need more trails, the roads used to maintain the powerlines can be accessed with much less impact (and cost) to the environment. The additional trails

aside, I am in favor of Metro's plans to develop the property with additional and safer parking, toilet facilities, seating and picnic tables. Lastly, the BFC property is one of the few parks that can possibly be accessed by public transport. I would urge Metro to work with CC Rider and/or Trimet to add a stop at Cornelius Pass and a paved sidewalk to the trailhead.

Metro's lawyer argued at the 4/3/23 Planning Commission meeting not to reopen the hearing process as it has already been years and a delay would be an imposition. That argument should not sway you as you make your decision on whether to approve Metro's request. It would be hubris to ignore ODFW's testimony and pretend it did not happen.

Sincerely, John Chen

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