



LUP Hearings <lup-hearings@multco.us>

TESTIMONY, regarding Case File: T3-2017-9165/T4-2017-9166/EP-2017-6780.

2 messages

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Dear Multnomah County Commissioners:

I would like to submit the following as written testimony regarding Case File: T3-2017-9165/T4-2017-9166/EP-2017-6780.

What is being recommended is "approval of a Type IV Quasi-Judicial Revision to the Multnomah County Comprehensive Plan." This revision is proposing "to designate the subject properties as four units of a local park" and include "approval of the Type IV Comprehensive Plan amendment."

As a professional wildlife biologist, author, and scientist who has studied Forest Park's amazing diversity of wildlife for three decades, I respectfully, and completely, disagree with the assessment as stated in the application. It states that the proposal "will not adversely affect natural resources." Further, the Planning Commission states that "the standard does not require a finding of 'no affect', but rather whether the proposal will have an 'adverse affect' on natural resources. After weighing the evidence in the record, the Planning Commission finds that the proposal appropriately balances recreational access and conservation goals; and on balance, the proposal will not adversely affect natural resources."

In my professional opinion, and those of other wildlife biologists and scientists with the Oregon Department of Fish and Wildlife, this is not at all the case. Granting approval to change the current zoning and to convert the area into a mountain biking park will have deleterious impacts on sensitive species of wildlife and also will influence, not only the future of North Tualatin Mountain natural area, but also what Forest Park will become in the future.

The properties in question lie in what is scientifically termed a "wildlife corridor." Presently, Forest Park's northwestern terminus maintains a natural link that extends all the way to Oregon's rural Coast Range along Tualatin Mountain and the properties in question. Acting like a funnel, this forested connection allows native animals to wander in and out of the park at will, thereby increasing the chances that local mammals and birds will be able to find suitable mates and appropriate habitat conditions. Mobility is crucial to survival for many species.

METRO purchased these properties with taxpayer funding to protect native wildlife and this corridor. The Multnomah County Comprehensive Plan, which I was a CAC member, designated these lands to be protected for wildlife movement. The proposed change would change this goal, and put recreation and the development of numerous mt. biking trails as the area's focus. This would be unfortunate, as the trails will infringe on elk breeding habitat and will degrade habitat that is very important red-legged frogs -- the largest native frog in the Pacific Northwest and suffering declining numbers. It is listed as a vulnerable species by the US Fish and Wildlife Service.

These concerns directly apply to the approval criteria submitted by planning staff, for four significant reasons:

1. **The application by Metro does not agree with the defined intent of the Multnomah County Comprehensive Plan.**

CAC members, of which I was one, 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.***" Metro's Burlington Creek SCP (Exhibit A.3, page 100 of the PDF) states: "A thorough ecological inventory and

Exhibit HH.18

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."

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. 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.

4. 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.

For all of these reasons, I adjure you to consider the science and social consequences of your decision and to deny approval of the applicant's proposal as currently written. As

David Barrios, an Indigenous Mescalero Apache, says of Forest Park and of this Tualatin Mountain land, "We are not the owners of it. We are borrowing it from our children and grandchildren and future generations."

The decision by the County Commissioners will make will make all the difference what this future will be.

Thank you.

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