



Coalition to Protect Forest Park

Chairperson Vega Pederson and Commissioners Meieran, Jayapal, Brim-Edwards, and Stegmann,

I am the President of the Coalition to Protect Forest Park, a diverse group of Multnomah County residents who are devoted to the preservation of Forest Park, our country's largest urban wilderness environment. We are writing in opposition to Metro's proposal to change the County's Comprehensive Plan to implement the provisions of the North Tualatin Mountains Access Master Plan.

The proposed changes will impact four Metro-owned parcels of forested land. As described by Metro, "Collectively, the sites preserve in perpetuity large blocks of upland forest, streams and habitat connectivity northwest of Forest Park and southeast of NW Cornelius Pass Road." The Coalition's opposition to the Plan change is borne out of the close proximity of the parcels to Forest Park and the impact on Forest Park wildlife that will inevitably result from the Plan change.

Of immediate concern to the Coalition is the proposal for the Burlington Creek Forest site, which includes both a Development proposal as well as a proposed Plan change. The Burlington Creek proposal would fundamentally change the nature of the forest land within the site. As the Staff Report describes, the proposal is "to develop recreational trails, restrooms, trail bridges, parking, and related amenities" on the site. The proposed trails, which include significant elevation changes as well as sharp turns and switchbacks, would be "mixed use" trails used both by pedestrians and cyclists.

The Coalition believes the County should approach the proposal from the perspective adopted by the City of Portland in the Forest Park Natural Resources Management Plan. The Management Plan makes clear that no development should occur in Forest Park until after appropriate studies have been completed on the wildlife, plants, and geology

of the Park. The philosophy of the Management Plan is one of “science first, then development if it is consistent with the science.

Metro’s proposal often takes precisely the opposite approach. Metro has completed no wildlife survey of the Burlington Creek site nor does the proposal require such a survey in the future so that the impact of the development can be measured against a baseline. The proposal promises future “monitoring” and “adaptive management,” but neither are a substitute for wildlife censuses. Metro’s proposal addresses only amphibians, focusing on two species, Red-Legged Frogs and Terrestrial Salamanders. The proposal entirely fails to address the impact of the development on mammals, insects, and fish.

Beyond the lack of a comprehensive wildlife study, the arguments made by Metro are disturbing. For example, the Red-Legged Frog is considered to be a “declining and vulnerable” species by the Oregon Department of Fish and Wildlife. The core of Metro’s position is that Red-Legged Frogs are capable of traveling 1/2 mile or more between their habitats, so “comprehensive monitoring would not lead to increased protection,” and that frogs generally move at night and during rain events, times when the trails would be less likely to be used, so that the resulting frog mortality would be small and at an acceptable level. This is not the sort of conservation policy the County should be following with a “declining and vulnerable” species.

The Forest Park Natural Resources Management Plan recommends regular monitoring of natural resources, the establishment of permanent wildlife monitoring stations, the development of a sustainable resources program, and a commitment that the health of natural resources should be “the top priority” for park managers. Metro’s proposal contains none of these commitments.

Beyond the matter of natural resources is the proposal’s request for “mixed use” trails on which both hiking and cycling would be allowed. “Mixed use” trails traversing slopes in forested areas are simply a bad and unsafe idea. Once again, Forest Park provides a ready reference. Cycling is allowed in Forest Park only on Leif Erikson Drive and fire lanes; it is not permitted on trails such as Wildwood, Wild Cherry, Aspen, and Dogwood. The trails are used by a wide range of individuals, including children, individuals with disabilities, and the elderly. Creating “mixed use” trails in the Burlington site would inevitably result in collisions between cyclists and hikers.

Finally, the attitudes of the public are important. The City of Portland's latest survey, conducted in 2017, reveals that 80% of respondents opposed any additional cycling in Forest Park. An earlier "trailhead" survey conducted by Portland State University resulted in only 6% of respondents listing "Increase Bike Trails/Mountain Bike Access" as a priority that would enhance enjoyment of the Park. To the extent that demand exists for more cycling in forested areas, the nearby Rocky Point Mountain Biking Trails, recently leased by the Northwest Trail Alliance from Weyerhaeuser, meet that demand.

The Coalition urges the Board to reject Metro's proposal.

A handwritten signature in black ink, reading "Will Aitchison". The signature is written in a cursive, flowing style.

Will Aitchison, President