

Multnomah Board of County Commissioners

1600 SE 190th Avenue

Portland, OR 97233-5910

October 18, 2023

To: County Chair Pederson, Commissioners Meieran, Jayapal, Brim-Edwards, and Stegman

Subject: Approval of mountain biking trails in Metro properties adjacent to Forest Park
Case T3-2017-9165/T4-2017-9166/EP-2017-6780.

You are holding a public hearing on October 26, 2023 to review approval of a Type IV Comprehensive Plan amendment that will change the current zoning of Metro owned properties on the North Tualatin Mountains adjacent to Forest Park to convert part of the area from wildlife habitat into a mountain biking park. Burlington and McCarthy Creek areas are targeted for mountain bike development. I object to this amendment.

Planning staff denigrate the wildlife habitat in this area to justify turning it into a mountain bike park. The Bond issues that supported the purchase of this wildlife habitat, Measures 26-80 and 26-152, were passed on the promise that the funds would be used to "**preserve** natural areas, **protect** fish, wildlife, and improve water quality." (emphasis added) Barbara Roberts statement in favor of Measure 26-152 is similar in intent: "Measure 26-152 will preserve our region's legacy of natural beauty by protecting rivers, streams, natural areas, and wildlife habitat. This will ensure that our children, grandchildren and all future generations enjoy the same quality of life we do."

The purchase, preservation and protection of the North Tualatin Mountains and their natural resources are fully in line with the statements in the Bond Measures and the voters pamphlet. Putting in mountain bike trails would have the opposite effect.

In addition, these properties lie in a "wildlife corridor." Presently, Forest Park's northwestern terminus maintains a natural link that extends all the way to Oregon's rural Coast Range through the Metro properties. 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.

As Marcy Houle, wildlife biologist, has pointed out in her comment letter on this proposed amendment, Metro purchased the properties with taxpayer funding to protect this corridor. The Multnomah County Comprehensive Plan designated these lands to be protected for wildlife movement. The proposed change would change this goal, and put recreation and the development of numerous mountain biking trails ahead of wildlife habitat preservation.

"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." Exhibit 1, p. 194-5 The Planning Commission is mistaken. Wildlife biologists and scientists with the Oregon Department of Fish and Wildlife disagree. Over the past few years, they have written letters and testified to the contrary. Marcy Houle attached their prior written testimony to her letter to you regarding this proposed amendment.

Moreover, the Planning Commission cannot reach this conclusion without requiring baseline wildlife surveys before adding trails. The proposal only promises future "monitoring" and "adaptive management" for salamanders and red-legged frogs, not insects, birds, mammals and fish. The monitoring suggested, but not required, is not true monitoring of wildlife populations. Before expanding mountain biking in Forest Park, the 1995 Forest Park Natural Resource Management Plan requires the monitoring of the natural resources in the Park. Similar requirements should be applied to the Metro properties on the North Tualatin Mountains before allowing a mountain bike park there.

"In conjunction with recreation use surveys, begin regular monitoring of natural resources to determine if resources are being sustained, improved, or degraded over time." (pp. iii-iv) This is required to be done through the Sustainable Resources Program.

"Protection of natural resources is a top priority and will be implemented through a new Sustainable Resources Program (SRP) for Forest Park. The essence of the program is regular monitoring of natural resource functions and values coupled with effective management response aimed at sustaining resources over time." (p.100)

"1. Monitor resources to determine their overall condition and to determine the effects of management actions."

"2. Take the following actions:

Establish permanent wildlife monitoring stations.

Develop monitoring protocol.

Monitor stations on an annual basis.

Conduct periodic nighttime wildlife censuses.

Coordinate (these data) with recreation monitoring programs." (p.100)

The new mountain bike trails pose an unacceptable threat of increased disruption of animal communities in Metro's properties that has not been properly evaluated. In one study evaluated by Dr. Vandeman, it was noted "Because flushing from recreational activity may come at the cost of energy needed for normal survival, growth, and reproduction ..., and because it may cause animals to avoid otherwise suitable habitat ..., it is important that recreationists understand that their activities can flush wildlife and may make suitable habitat unavailable." "Science Proves Mountain Biking Is More Harmful Than Hiking, The Impacts of Mountain Biking on Wildlife and People, A Review of the Literature, by Michael J. Vandeman, Ph.D, July 3,2004. http://www.culturechange.org/mountain_biking_impacts.htm Dr. Vandeman concludes that since bikers are able, and typically do, travel several times as far as hikers, bikers have several times as much impact on wildlife as hikers. After reviewing a number of studies comparing the impacts of hiking and mountain biking, Dr. Vandeman concludes:

“Some of the important characteristics of mountain biking that have been ignored are: speed; distance traveled; the increase in number of visitors that bikes allow; increased trail-building, with its attendant habitat destruction; the displacement of soil (other than downhill); the killing of roots and soil organisms and ecosystems; most effects on wildlife; manner of riding (skidding, braking, acceleration, turning, and representativeness); tire tread; and noise (bikes are relatively quiet, but a rattling chain may be perceived as "alien" to natural surroundings).”

Moreover, “on the east flank of the Tualatin Mountains. . . . Elevations rise from about 75 feet mean sea level along the Willamette to 850 to 1100 feet along the Skyline. . . . As with Forest Park “the landscape is deeply dissected by streams originating along the crest and draining east to the Willamette River . . . stream gradients reach as much as 11.5%. (600 feet per mile) . . .” 1995 Forest Park Natural Resource Management Plan, p. 32

“Forest vegetation moderates the effects of winds and storms, stabilizes and enriches soil, and slows runoff from precipitation.” p. 29 But the North Tualatin Mountains’ terrain is particularly susceptible to erosion. “Because of the steep terrain and fine-textured soils, a minor amount of accelerated erosion was found in disturbed areas where soil was exposed. This includes fire lanes, roads and trails that exist on all soil types.” p. 34 Soils on the property do not infiltrate water well and there is a very high risk of landslides. It is for these reasons that The Forest Park Plan allows bikes on 30 miles of roads and certain firelanes, but not the soft dirt trails of Forest Park that are reserved for pedestrians. The Plan, pp. 75-77 and map in between. Bike trails must be hard packed dirt or gravel and at least 8 feet wide. The Plan, p. 174. For these reasons the Metro properties on North Tualatin Mountains are not suitable for off road cycling trails.

It is laughable to suggest that trails can be designed to minimize erosion and rutting, Exhibit 1, p. 194, “skidding, braking, acceleration, and turning” are the point of mountain biking in soft dirt trails. Off-road cyclists accelerate erosion for several reasons. For example, in the adjacent Forest Park they seek the excitement of rapid movement up and down the steep terrain that is often wet, “a more engaging riding experience.” Frequently Asked Question, **Why is the Off-road Cycling Master Plan exploring options in Forest Park**, on the Bureau of Planning’s off-road cycling website.

In the Oregon Statewide Recreation Trails Plan for 2016-25, p.89, single-track riders self-evaluated their desired pace as moderate (37%) to vigorous (42%). Single-track riders want 27% of nearby trails to be at a challenging level of difficulty and 58% of trails outside their communities at a challenging level of difficulty. Figures 67, 68, p. 95. While 75% of hikers prefer a trail length of less than 5 miles, 85% of single track riders prefer trails longer than 5 miles, (33% 6-10 miles) (29% 11-15 miles) (24% over 15 miles).

George Wuerthner describes these and other adverse impacts from mountain bike access in his 2019 Wildlife News article: <https://www.thewildlifeneeds.com/2019/06/18/impacts-of-mountain-biking/> If mountain bikes, including e-bikes, are given a new parking lot and expanded access to the North Tualatin Mountains on natural surface single track trails, these significant adverse impacts will extend throughout the area. As George Wuerthner observed in his Wildlife News article:

“Due to these improvements, it is reasonable for a mountain biker to cover 20-30 miles in two or three hours. By contrast, all but the fittest hiker is going to have trouble traveling even 20 miles in an entire day. The ability to travel farther and faster, “shrinks” wildlands. That is why mountain bikers continuously advocate for more trails and routes. One of the problems with the mechanical improvements of mountain bikes over the years has been a greater ecological footprint. The distance one can travel, and the places one can access has increased tremendously. This means mountain bikers “chew up” trails and landscapes and the potential for displacement of wildlife is vastly amplified.”

George Wuerthner also points out that one of the rationales given by mountain bikers to justify the ever-expanding trail systems is that it allows one to get closer to nature or out in nature.”

But if one takes the industry advertisement as insight into the mind of the user, communing with nature is not the primary goal. Instead it seems the main goal is tearing up the miles and self-gratification. Roaring along at high speeds on a machine is hardly conducive to communing with nature. If anything, thrillcraft use exacerbates our society’s alienation from nature, creating a barrier that separates people from experiencing nature on its own terms.

It is also for this reason that adding mountain bike trails would not “provide opportunities for people from around the region to experience nature close to home” as Measure 26-252 suggested. To the contrary, creating mixed use trails for hikers and bikers reduces hikers’ enjoyment of nature. The Forest Park Conservancy formed a Committee with mountain bikers and the Portland Parks and Recreation Department to produce a White Paper on Off-Road Cycling in Forest Park, dated May 19, 2009. The Committee stated:

“It appears that user conflicts between pedestrians and cyclists are increasing within the Park. While there are no systematic counts of conflicts, the Forest Park Conservancy receives complaints about cyclists on trails designated pedestrian-only, as well as reports of conflict on the shared use trails, roads, and fire lanes which are open to bikes. With the growing popularity of off-road cycling, these problems will potentially worsen unless this issue is addressed in a comprehensive manner that addresses both conflicts with user groups and efforts to protect the Park’s natural resources.” p.3

Wuerthner also writes that a key threat to wildlife habitat is the tendency of many mountain bikers to create rogue trails. “One of the similarities is the ‘outlaw mentality’ among many motorized abusers of the land, and the same attitude seems to permeate many mountain bikers as well.” Mountain bikers cause more adverse soil and vegetation impacts when they engage in unpermitted off-trail riding. In Forest Park studies “Morlock and others (2006) noted that the frequency of unpermitted off-trail activity by mountain bikes was the greatest cause of adverse soil and vegetation impacts. They concluded that the ecological impact of unpermitted off-trail routes was the primary argument for limiting mountain biking access to public lands.”

Planning staff have prioritized new mountain bike trails over repair of damage and protection of natural features in the area. But in the Oregon Statewide Recreation Trails Plan for 2016-25,

p.100, the highest priorities for new trails and maintenance identified in Region 2 where the North Tualatin Mountains are located were repair of major damage and protection of natural features. (77% each). New trails were a low priority, with hiking, ADA and running trails ahead of new natural surface trails for bikers. (24%) Another “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.

Moreover, planning staff pursue mountain bike trails on behalf of a small wealthy user group in region 2 where hiker runner activity days dwarf biker activity days on unpaved trails, 61,473,000 to 3,550,100. Trails Plan for 2016-25, pp. 84-85, Table 19. According to the same Trails Plan, figure 52, p. 83, 19% of Oregonians had incomes in excess of \$75,000/yr., while 47% of unpaved bikers had incomes in excess of \$75,000/yr.

http://www.oregon.gov/oprd/Trail_Programs_Services/Documents/2016OregonStatewideTrailsPlan.pdf

The National Association for Olmsted Parks issued a statement in 2018 that warned against building mountain bike trails in Forest Park to serve “a small segment of the local population at great risk to the rest and the landscape itself”:

Introduction of single-track trails would be destructive in a great many ways, and irreparable damage done. The overarching loss would be the park’s treasured natural character and tranquility. Erosion, slope destabilization, canopy loss, fragmentation of fragile vegetation and wildlife habitat and dangerously incompatible uses are but some of the foreseeable consequences.

Their comments apply with equal force to Metro’s North Tualatin Mountain properties.

Instead of placing a mountain bike park on the North Tualatin Mountains, you should follow the advice of former Commissioner Nick Fish who opposed putting single track bike trails in Forest Park. On September 30, 2010 Commissioner Fish and Parks Director Santner expressed a commitment to expanding single track cycling access in other parts of the Portland metropolitan area:

- With the support of Mayor Sam Adams, PP&R will take the lead role in managing Gateway Green and prioritizing single track cycling in this new park.
- PP&R will work in partnership with the NW Trail Alliance to construct two new temporary skills parks.
- With the support of Commissioner Randy Leonard, PP&R and the Portland Water Bureau will improve the recreational experience for pedestrians, equestrians, and bikers, while also increasing natural area protections at Powell Butte Natural Area.
- The City will continue to work with Metro and Intertwine partners to provide more single track cycling opportunities in the Portland region.

The North Tualatin Mountains are a reservoir of Earth’s biodiversity that should be preserved. In *Half-Earth, Our Planet’s Fight for Life*, 2016, p. 135, Edward O. Wilson wrote:

“The clear lesson of biodiversity research is that the diversity of species, arrayed in countless natural ecosystems on the land and in the sea, is under threat. Those who have studied the database most carefully agree that human activity, which has raised the species extinction rate a thousand times over its prehuman level, threatens to extinguish or bring to the brink of extinction half of the species still surviving into this century. Yet there remain scattered around the world many reservoirs of Earth’s biodiversity, from a few acres in area to authentic original wildernesses with areas in excess of many thousands of square kilometers. Almost all of these last domains of the natural living environment are under some degree of threat or other, but they can be saved for future generations if those alive today have the will to act on their behalf.”

Mountain bikes threaten this “last domain(s) of the natural living environment,” but this domain “can be saved for future generations if those alive today have the will to act on their behalf.”

Approving the plan to turn a fragile biodiverse key wildlife corridor into a mountain biking park would break the promise made in the bond measures.

I am a 1972 graduate of the University of Washington. I attended the environmental group convocation at the first UN Conference on the Environment in Stockholm in 1972. I am a 1975 graduate of the University of Washington School of Law. I was a staff attorney with the Fish and Game Division of the Washington State Attorney General’s Office from 1977 to 1984. I retired in 2014 as Deputy General Counsel for the Bonneville Power Administration after nearly 30 yrs. at BPA. I also provided pro bono legal advice to the Columbia Land Trust and the Coalition of Oregon Land Trusts and its members from 2008 until 2019.

I rode my bike to work at BPA for most of my 30 years there, but never in Forest Park. I have hiked every trail in Forest Park since I moved to Portland in 1984. Sharing the shrubs and trees with the wildlife and the elements, I find peace and comfort there. As John Muir observed, when you hike in nature: “Nature’s peace will flow into you as sunshine flows into trees. The winds will blow their own freshness into you and the storms their energy, while cares will drop off like autumn leaves.”

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