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Testimony for Planning Commission SIMC RAP, Jan 5 Meeting

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Wed, Dec 31, 2014 at 9:32 AM

To: Kevin COOK <kevin.c.cook@multco.us>

Cc: Deborah Kafoury <mult.chair@multco.us>, Bailey Jules <district1@multco.us>, Kim PEOPLES <kim.e.peoples@multco.us>, "Donnelly, Jennifer" <jennifer.donnelly@state.or.us>

December 31, 2014

Planning Commission
c/o Kevin Cook, Planner
Multnomah County Department of Community Services



Dear Planning Commissioners:

I appreciate the opportunity to comment on the draft of the Sauvie Island Multnomah Channel Rural Area Plan (SIMC RAP). I served on the Community Advisory Committee (CAC) and have lived on Sauvie Island for 30 years. The plan policies that will guide decision makers over the next 20-plus years are critical. These comments are motivated from a great love and respect for this beautiful place.

There are two attachments - one contains summary notes about the CAC process that were previously sent to Kim Peoples, Director of Community Services for Multnomah County, after meeting with him to express my profound concerns regarding the process we went through. The other attachment is a definition of rural character that was submitted to planning staff in August, 2014. A portion of this language was included in the plan narrative, but staff chose not to include the section describing "threats" to rural character. The entire plan rests on a vision statement - "The vision for the Sauvie Island and the Multnomah Channel planning area is to retain its cherished rural character and agricultural productivity, to enhance resource protections, and to reduce and manage cumulative impacts of recreation, visitation, and commercial activities in order to preserve the distinctive character of the island and channel for future generations."

You will have received comment from Mark Greenfield dated December 18, 2014, describing a close working relationship with five other island residents who served on the CAC and/or Technical Advisory Committee. I am one of them - and in an effort not to be redundant - I want to say that I fully support both the substantive policy modifications that have been forwarded to you on our behalf, under separate cover, by Kevin Cook, as well as the clarifying language changes. I believe these policies go much further to accomplish the vision, than the policies in the draft plan.

I request that throughout the hearings you carefully consider that the initial Scoping Report stated, "Many of the issues identified during the scoping process were directed at keeping the island and channel as a rural area, with a focus on farming, connections to wildlife and nature, and an overarching concern about the future development of the area. *Almost every response submitted indicated that the rural character of the area is threatened. Another major issue raised was inconsistent and unclear policies, regulation, and enforcement.*" (italics are mine)

The Scoping Report eloquently captured the concerns of the community - that were further emphasized in public comment (28 people commented) at the meeting of the Planning Commission on Sauvie Island on January 6, 2014. While the plan narrative describes concerns and background, the policies in this plan do not adequately address the very genuine plea of the community to preserve and protect the rural and agricultural character of the island. With a few notable exceptions - the policies are not clear or specific - and lack commitment to unambiguous policy choices that support the vision statement.

The staff has put forward their report and draft plan - and we have offered very specific alternate policies and refining language in an effort to actually preserve rural character, productive agriculture and the protection and preservation of resources, wildlife and habitat. What I feel desperate for you to hear is - the island cannot be all

things to all people without losing its unique character. The island has some of the best soil in the region for agriculture and is home and habitat for diverse wildlife. It is home to 4-500 households on land - and another 250-300 homes on the waterways. It is a rural agricultural community that is sparsely populated. People who come to live here tend not to leave for decades - some families for over a century.

The current trend of Multnomah County expanding allowable "uses" on the land has already changed the island profoundly in the last decade. If the rate of change and demand for "use" in the area during the last decade, combined with projected population growth of the Portland-Metro area are modeled going forward, it is difficult to imagine what this island community will look like one and two decades from now. There may not be a lot of new buildings - but the density of vehicles, parking and sheer numbers of people at destination points will not be rural in nature. We see and will increasingly see high density urban scale use in a rural setting. The policies in this document do not go far enough to address these issues - and instead leave a wide subjective interpretive field that will allow continued incremental degradation of the area and probably unending lawsuits. One community member used the term to describe these incremental changes as "death by a thousand cuts".

I urge the Planning Commission to take the time to consider all of the written and verbal testimony carefully - and to refuse to accept or forward a plan to the Board of County Commissioners that does not genuinely meet the needs of the SIMC community expressed in the Scoping Report and repeatedly throughout the CAC process. The modified policies go much further toward the realization of the vision statement through well-stated goals and specific policies to meet those goals.

Thank you for considering these comments.

Sincerely,

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2 attachments



Island&Channel Rural Character Final.docx
22K



Notes about CAC process.docx
19K

8/17/2014

RURAL CHARACTER OF THE SAUVIE ISLAND MULTNOMAH CHANNEL AREA

The vision for the Sauvie Island/Multnomah Channel (SIMC) planning area is to retain its cherished rural character and agricultural productivity, to enhance resource protections, and to reduce and manage cumulative impacts of recreation, visitation, and commercial activities in order to preserve the distinctive character of the island and channel for future generations.

What is the cherished rural and distinctive character of the island and channel that is to be preserved for future generations?

The SIMC Scoping Report states “Many of the issues identified during the scoping process were directed at **keeping the island and channel as a rural area, with a focus on farming, connections to wildlife and nature, and an overarching concern about the future development of the area.** Almost every response submitted indicated that the rural character of the area is threatened.” 3.2, p.8

Sauvie Island consists primarily of a state wildlife refuge that occupies most of the northern 2/3rds of the island and agricultural lands in large blocks that occupy most of the southern third of the island. Acreage homesites, many in farm use or habitat restoration, are concentrated in several areas along or near Gillihan Road, Sauvie Island Road and Lucy Reeder Road, and there are several moorages/marinas located near the intersection of Sauvie Island Road and Reeder Road. The impression one gets upon visiting the island is of a sparsely occupied area dedicated to agricultural production, wildlife habitat and open space, where people use the land to produce food and share the land with wildlife.

The rural and distinctive character of the SIMC area to be preserved, its “sense of place”, includes the following:

- **Natural beauty:** The openness and greenery of the area, together with expansive views of four Cascade peaks and two rivers, give the island a rare and special beauty in the Portland metropolitan area.
- **Sparse population and low-intensity uses:** The land is intended for growing food, raising livestock and preserving wildlife and habitat.
- **Low environmental impacts:** Low-density vehicular traffic, thriving diverse wildlife and plant life, quietude, good air quality, good water quality and availability, and residents committed to protecting and enhancing the environment contribute significantly to low impacts.
- **Diverse landscapes, life forms & uses in a single bounded area:** Rich productive farm land, rivers and lakes, fields and forests, wildlife, marine life, plant life, all coexist with a small human population in the SIMC area.
- **High-value farmland:** All of the agricultural land on Sauvie Island is foundation farmland, which is considered by the State of Oregon to be the most highly valued agricultural land in the State. For this reason, Multnomah County and the State of Oregon have designated Sauvie Island as a Rural Reserve.
- **Family-owned farms:** Some farms have been in the same families for generations.

- **Wildlife and habitat reserves:** 11,564 of 26,000 acres of the island area is owned by the Oregon Department of Fish and Wildlife (ODFW) and reserved for wildlife and habitat.
- **Finite geographical features:** Unlike other rural areas, access and egress and the area itself, are defined by the water on all sides, a single bridge, and minimal road connectivity.
- **Undeveloped natural features:** There are few paved surfaces other than main roads, minimal signage, an absence of commercial enterprises & buildings other than farms and a few cottage industries, and a notable absence of suburban-like developments and subdivisions.
- **Island/Channel community services:** There are no sewers or public water facilities. Ground water via wells supply all water needs. Sheriff's patrol and the small volunteer RFPD provide police, fire and emergency services
- **Access to off-island community services:** Unlike many rural areas, services are easily accessible within 10-15 miles to the north, south and west, in urban areas, including grocery stores, hospitals, and an entire full-service Portland metropolitan area.
- **Sense of place:** The community and visitors to the island value and are inspired by open farmland, open waterways and vistas, nature, wildlife, habitat and the serene and quiet quality of rural life. Islanders are committed to retaining and improving the environmental quality of land, water and sky for future generations and all life forms.
- **True rural community:** Sauvie Island is an outstanding example of a supportive rural community. Islanders are all each others neighbors, regardless of distance. While interests are diverse, they enjoy each others company and are there to help one another in times of need.

The American Society of Landscape Architects urges that the unique qualities of rural landscapes and communities be protected, even as competing needs of a growing population and vibrant economies are met. The rural landscape, whether forest, field, farm, or village contains vital ecological, economic and cultural qualities that are a finite and dwindling resource. Their protection, conservation and preservation are important to the well being of the nation. Saving these assets for the benefit of future generations can only be achieved through the application of sound principles, policies and practices including wise land use planning, design and management.

As population expands, greater pressures are placed on the rural landscape to meet a variety of demands. Uses imposed upon the natural landscape without consideration of and respect for aesthetic values, natural processes and cultural and historic heritage can pose severe and irreversible harm. (American Society of Landscape Architects, Policy on Rural Landscapes, 2007)

The following pose real and current threats to the rural character, rural landscape and distinctive sense of place of Sauvie Island:

- **Increased visitation in numbers that often exceed capacity:** Sauvie Island is currently estimated to have over a million visitors annually. Continual increase in visitation may exceed the island's capacity to absorb it. The population of the Portland Metropolitan area is predicted to grow by another 800,000 in the next 20 years. The Sauvie Island/ Multnomah Channel area already attracts visitors to beaches, waterways, farm stands, events, parks and wildlife areas in numbers that exceed parking capacity during peak use days. The island roads themselves attract

cycling enthusiasts from the region and beyond. Without clear purposeful policies, the increasing popularity and intensive use of the area will irrevocably change the distinctive rural character of the island that is cherished by residents and visitors.

- **Entrepreneurial events:** Though the community is generally supportive of agricultural-related promotional activities for farm stands to sell crops, offer u-picks, educate children about farming, etc, the recent trend of adding concerts, prepared food, alcohol, and drawing large crowds and hundreds of vehicles to a single event, has already begun to change the peaceful rural character of the island with noise, crowds, traffic and congestion. These activities also impact the ability of commercial farmers to operate efficiently and economically. There is significant concern that event-farming could begin to change land use patterns intended for productive agriculture.
- **Promotion of the Sauvie Island Multnomah Channel area as a premier regional recreation destination:** This creates an unprecedented need for management, services and road development to accommodate high-density recreational use on an increasing number of days and weekends each year. While creating bike lanes and multi-use paths may temporarily decrease conflicts between users, all indications are that use will continue to grow with those accommodations. Developing sufficient infrastructure to safely accommodate 1-2 million visitors annually would create a situation akin to a large managed island recreation park for tourists, rather than a rural natural setting where a small community lives, grows food, and cherishes its quietude and relationship with nature. ODFW has already noted the impact of increased visitor numbers on wildlife.
- **Lack of recognition/understanding of the ineffable quality of rural life:** People often choose a rural way of life to farm, to be in close daily relationship to land, water, nature and wildlife. They purposefully seek low population density, low traffic, quietude, etc. Relative quiet, peace, solitude, space and a preponderance of the natural world are highly valued and preferred over what high-density lifestyle offers. To allow increased levels of visitation with attending noise, traffic, speed, accidents, crime, signage, litter and other types of pollution into the SIMC area, is to change its fundamental character and undermine a cherished way of life for residents and visitors who seek renewal and refreshment that is qualitatively different than what urban and suburban areas offer. This is counter to the vision statement of this plan and against the hopes and desires of the community.
- **Mass and other gatherings:** Laws authorizing gatherings allow an almost limitless variety of large-scale events to occur without any attention to whether the type of event requires a venue within active agricultural lands, with little to no regulation by the County or any agency. These types of events, left unchecked, allow single individuals to undermine the quality of life for all other island residents. The County can and should exercise all options to limit the social and environmental impacts of gatherings on the SIMC area to maintain and preserve its existing rural character.
- **Failure to enforce:** The County's voluntary compliance policy has resulted in code violations going unchecked on the island, eg, weddings, concerts and other large scale commercial events. In an island community of under 500 households, neighbors are reluctant to file formal complaints and have no other means of inquiring about which uses are legal. Suggestions have been repeatedly made to attach enforcement costs to permits.

Notes sent to Kim Peoples, Multnomah County Community Services Director after meeting to discuss Community Advisory Committee process

Cindy Reid's notes/follow-up re: CAC process & outcome (12-9-2014)

- **Scoping Report & first Planning Commission meeting** clearly demonstrated community's concern that the rural character of Sauvie Island is threatened and requested that a host of issues be addressed in a way that would result in greater clarity and specificity regarding policies, procedures and standards – and that they be actionable and enforceable on the ground. In a careful read of the scoping report and the draft plan – the concerns of the scoping report have not been sufficiently addressed at the level so clearly requested. The first PC meeting where public comment was taken, repeated the concerns of the Scoping Report in spades.
- **Building a “common vision”** for Sauvie Island was never fully developed or completed. There was a visual preference survey that resulted in some hot spots on a dark map of Sauvie Island without language to support what those images meant (or look like). There was almost an active dismissal of continuous requests to give definition to “rural character” in a way that one could know at some future date if efforts toward preservation were successful. A portion of a rural character definition was finally included in the draft plan but left off half of the document that discussed threats to that character. Every effort to get visual examples, definitions or standards as to what “preservation of rural character” would look like on the island roadways (level of vehicular density and flow), and at destination parking areas – was left unaddressed in a meaningful way. (Everything left to a future demand management study – that has no stated “vision” for the rural roadways).
- **Differing views** re: agri-tourism and marina development became apparent very early on, even looking at the composition of the CAC. There was an effort to delineate the differences and seek clarification of the law, where possible – but we missed the opportunity to deepen the dialogue toward building a possible common vision. For example, there is huge support for agriculture, farms, farm stands, farming families – and for agricultural related events – the great divide occurs when those events, noise and traffic encroach on the livability of residents, or begin to take prime farmland out of production, or are perceived as fully unrelated to agriculture and moving in directions that threaten rural character. There were no real discussions about how to get at underlying needs and fears – needs for farming income and viability and passing on those opportunities to one's children – as well as needs for living in peace and quiet and enjoying one's property and surroundings. It seems that some high-level mediation skills combined with facilitation may have brought forth more of the true common ground and vision – but instead – we spent months re-iterating (the same) differences and perhaps inadvertently driving them deeper. At several junctures, members of the CAC wanted more time – and the ground rules provided to make “more time” – but those requests often went unheeded (throughout the process, not just at the end)

- **Hard to know where things stood after meetings** – clear meeting summaries did not come out in a timely way – or really at all – We received huge packets of materials sometimes just days before meetings with little time to read or organize meaningful comment – eventually we got things at least a week in advance – but there were no timely summaries of meetings after they occurred and it was difficult to know where things stood going forward.
- **Big breakdowns** occurred when fairly specific policy language proposals formulated by the CAC, consultants and staff morphed into a document that was allegedly whittled down by “County Legal” into something far less committal very late in the game. I don’t recall the exact date of that meeting (June or July) – but it resulted in the full CAC expressing dismay. The next meeting, Aug. 4th, also resulted in several attorneys in the room representing very different points of view, all oddly agreeing that the draft plan document, as written, was fodder for lawsuits due to lack of specificity and clarity. Phil Grillo called the policy language “flaccid”. All but one CAC member did not want to support the plan draft in its Aug 4th form. I believe it was at this meeting (or perhaps an earlier meeting) that Chris Foster suggested that if we were dissatisfied with County’s policies – we should write our own as alternatives.
- **Hiatus after Aug 4th** – during this time (a couple of weeks with no info from County re: CAC or game plan for proceeding) a group of CAC and TAC members made an effort to contribute policies and a rural character definition – and requested that this work be forwarded to full CAC and others . This request was declined by County staff. The work was sent to CAC (by the authors) with the intention of helping the full discussion move forward – but was instead characterized as the work of a “breakaway” group – and was never given consideration by staff at subsequent meetings, despite being told by staff that language was going to be rolled back to June 10th language, and that all new policy suggestions would be welcomed. They were not only not welcomed, there was never time permitted to even bring them to the table in either of the last two sub-committee meetings or at the final CAC meeting. They are instead going to the Planning Commission never having been fully discussed or developed by the CAC.
- **Clear policy language** – the CAC process was to have helped to develop a shared community vision and to make recommendations toward a new RAP with clear policy options. The decision to use almost wholly non-binding, vague language throughout the policy document with a couple of notable exceptions (agri-tourism and floating homes) was and is troubling. The RAP is to provide a clear framework for decision makers going forward. Yet, we were repeatedly told during the last two subcommittee meetings by Casey Filice, “we can’t tell any other County department what to do”, “we can’t tell other agencies what to do”. This RAP document is to provide the vision and policy framework so that the County and other agencies can indeed “know what to do” regarding the Sauvie Island Multnomah Channel (SIMC) area. That is the point of having a plan. The County and its various departments are the actors sitting at the tables where the decisions affecting SIMC are made. This plan was to have been a clear blueprint for those decisions.
- **Cumulative impacts of County Land Use decisions on SIMC area** – at the very beginning of the CAC process, the issue of cumulative impacts of various activities, uses and events was brought up as a critical issue. Staff and consultants decided that this area of concern would probably

come up throughout the sub-committees and best get dealt with toward the end of the process and did not want to make it a main topic area of its own. To date, the plan – and the Land Use and Transportation Dept – do not provide a means of predicting, measuring or managing cumulative impacts. While each “business” has to submit a traffic impact study – there is no on-going review or monitoring – so parking lots expand over farm fields at will – concerts drawing 100-150 people have grown into concerts that have 500 or more cars at \$10 a carload – and reported counts of up to 2000 people in attendance at times – at just ONE farmstand. This summer-fall season had an unprecedented number of rock concerts at farm stands (called by whatever euphemism). No one is watching, no one is counting, no one is enforcing – but the delineated “parking lots” don’t hold the crowds, the cars are out into the fields, the noise bothers neighbors – and rural character is fully compromised at those times. This isn’t “the future”, it is now.

On October 17th, traffic was backed up on Hwy 30 at some parts of the day such that people waited over an hour to get onto the island and had to turn around, costing some people money, others frustration. Later in the day, traffic was backed up on the island for miles in every direction for hours. No one really knows if resetting the traffic light after the power failure would have made enough of a difference to keep traffic moving. All of this “impact” with “only” 3 event farmstands operating - what happens when Multnomah County’s Land Use dept allows more farmstands with events, more concerts, more catered food/wine venues, because no one has a handle on, or a will to deal with cumulative impacts directly? This plan is not substantive, concrete or specific enough to affect a shift in what is **actually already happening** on the ground, and will continue to happen in increasing numbers.

The Scoping Report and testimony at the first planning commission meeting should have sufficiently set the stage for creating a substantive plan for protecting the rural and agricultural character of the SIMC area now going into the future – but after 15 months and tremendous effort – we didn’t get there – and I’m not yet seeing how that will happen in the course of the Planning Commission and Board of County Commissioners hearings. I hope a venue and highly skilled facilitation/mediation is provided to resolve these issues in a meaningful way as we go forward.