

Carol Chesarek
13300 NW Germantown Road
Portland, OR 97231

May 2, 2016

To: Multnomah County Planning Commission
c/o Multnomah County Department of Community Services
1600 SE 190th Ave.
Portland, OR 97233

Subject: Suggested Revisions to the Draft Comprehensive Plan and TSP

Chair Ingle and Commissioners,

Thank you for the opportunity to provide some comments on the draft Comprehensive Plan and the draft Transportation System Plan (TSP). While I was not a member of the Citizens Advisory Committee, I attended all of their meetings, including all but two of the subcommittee meetings. I also met regularly with CAC members from the West Hills to discuss policies.

General points:

- 1) Most of the content in these documents is excellent and should be adopted.
- 2) County staff and the citizen advisory committee generally did terrific work.
- 3) While the process resulted in proposed changes to existing policies and some new policies, in most cases the intent of previous policies did not change – most of the policies in this draft are minor revisions of previous policies, not radical new material. We want to protect farm and forest lands. Protect Natural Resources. Try not to put structures in dangerous places. Manage the transportation system so it is safe and effective but also will help reduce carbon emissions.
- 4) There are a few changes I'd like to request, described below.

I want to express my appreciation for staff's patience and willingness to work with the CAC and interested members of the public to craft good policy language. I'm especially appreciative of the language about context sensitive design, options other than 4' paved shoulders for bicyclists, and wildlife crossings in the TSP.

Here are my specific suggested changes:

Comprehensive Plan

Map Formats

Maps are important, not just as a form of reference information, but also to help us understand the unique characteristics of the places we live. We have 4 very unique rural areas that are being “streamlined” into a single plan. That’s OK. But combining these plans also tends to homogenize the rural lands that are referred to, without valuing their unique characteristics. It is important to have all the right maps, presented in a good format, to help property owners better understand the places we live, and to provide context for all the different policies in this plan.

I am disappointed at the treatment of some of the maps in the Comprehensive Plan. I know that staff believes that most people will view the plan online and that as long as high resolution maps are available online then all will be fine. But I think that we can do better in the printed, first view plan (without adding 11 x 17 fold outs).

Instead of including maps like the zoning map (Land Use p. 4) that spread all of Multnomah County across the top of a page at a tiny scale that’s of little use, separate the maps into east county and west county. The current format wastes a lot of area on the middle of the county, urban land which isn’t governed by this plan. A west county map can provide good scale of Sauvie Island and the West Hills on a 8.5 x 11 page. East county maps fit well sideways on an 8.5 x 11 page. Those maps can follow or introduce each section, they don’t need to be embedded in the middle. Or the larger maps could be included in an appendix at the end of the document if including them with the text disrupts the flow of the document.

Another example of the problem (I won’t try to list them all) is Figures 2 and 3 showing east and west Farm Zones on pages 4 & 5 of the Farm Land section – there is a lot of wasted map content that results in the useful content being far too small to be useful even for casual use.

Some of us do still use printed documents, which are handy to be able to put next to the computer as a reference while we’re working, or that can be used to look things up without (gasp!) turning on a computer or smart phone.

Missing Maps

There were a number of maps that we requested which were not included in the draft plan. Staff included most of the maps we asked for, but there are a few still missing that we’d value.

Existing maps/images included in the West Hills Rural Area Plan which are not currently in the Comprehensive Plan:

- Rural Centers
- Water districts
- Public and private non-profit lands (these are not necessarily associated with Recreation and should be in the land use section). Include BLM land, Forest Park Conservancy and Metro properties. Include Oregon Parks Foundation lands mentioned in the section on Wildlife Habitat (don’t know if these are still in the same ownership). Show non-profit and agency lands around Forest Park, including Forest Park, Audubon, and Metro ownerships near Audubon to show the connection to similar ownership in county

jurisdiction. The “Parks and Open Space” map categories are too general to be useful, particularly the “Open Space” designation.

And I’d like to see one new maps:

- If the new DOGAMI landslide hazard maps aren’t available, it would be helpful to include the historical landslide map. Many people aren’t aware of how widespread past landslides have been, and this map could help educate them.

Land Use

Policy 2.6 Protect farmland and forest land from encroachment by residential and other non-farm or non-forest uses that locate in the RR zone. (Land Use p. 10)

Encroachment¹ doesn’t seem like quite the right term, it sounds like we’re fending off RR uses that might creep into farm and forest lands, but the concern is usually what’s called out more specifically in the Policy 2.7 – ensuring that new, replacement, or expanding uses in the RR zone minimize impacts on farm and forest uses. But the Policy 2.7 is about right-to-farm covenants that protect farms from complaints about farm practices, not about limiting rural residential uses that conflict with nearby farm and forest uses.

Consider instead:

Policy 2.6 Protect farmland and forest land ~~from adverse impacts due to by-encroachment-by~~ residential and other non-farm or non-forest uses that locate in the RR zone.

Other policies use language like “minimize adverse impacts of XX on farm and forest uses” so that’s another option you could consider.

Grading and Fill

The county should stop allowing Large Fills (exceeding 5,000) cubic yards in RR zones. This idea was discussed at the CAC, but the discussion kept coming back to the requirements that needed to be met (which are good) before such fill should be allowed, and never really got to whether such a large fill is ever appropriate in RR zones even if it is not allowed on landslide prone slopes or in riparian zones.

5000 cubic yards of fill is over 400 dump truck loads, and will cover an acre of ground more than 1’ deep in fill.

¹ **Simple Definition of *encroach*** from the Merriam-Webster's Learner's Dictionary

- to gradually move or go into an area that is beyond the usual or desired limits
- to gradually take or begin to use or affect something that belongs to someone else or that someone else is using

The draft (and current) policy would allow more than 5000 cu yards of fill on RR and MUA properties. The draft policy won't allow this much fill on resource lands (EFU and CFU), why would we allow it on smaller RR properties?

Proposed change to stop allowing more than 5000 cu yards of fill on RR properties:

Policy 2.43 Establish limits for fill that does not qualify as an agricultural management practice and is subject to County review requirements. (Land Use p. 21)

Strategy 2.43-1: Amend the Zoning Code to clarify that in all zones except for the MUA-20 ~~and RR zones~~, a total cumulative limit of 5,000 cubic yards of fill per each Lot of Record is allowed. Large Fills exceeding 5,000 cubic yards are only permitted in the MUA-20 ~~and RR zones~~ subject to approval of a Conditional Use permit.

Strategy 2.43-2: Amend the Zoning Code to clarify that Large Fills must be in conjunction to an approved use.

Farm Land

The CAC representatives from the West Hills asked to have the recently adopted Sauvie Island agri-tourism policies apply in the West Hills too. But SIMC Policy 3.24 (Farm Land p. 16) didn't get written into the West Hills policy section. It would be good to add it (replacing "Sauvie Island" with "West Hills.")

Policy 3.24 Support the direct sale of farm crops and livestock raised on Sauvie Island farms through u-pick facilities and farm stands in a manner that retains a maximum supply of agricultural land in productive farm use and minimizes impacts on nearby farming operations, residents, roads, traffic circulation, wildlife, and other natural resources.

Natural Resources

First, two small things. Policy 5.17-6 appears likely intended to apply both to wetlands and riparian areas (it is in a section that discusses both), but only riparian areas are mentioned. Add wetlands:

Strategy 5.17-6: Periodically review and consider new data to update the inventory of significant wetlands and riparian corridors.

Also, I'd like to see Policy 5.48 apply to the West Hills, if not county-wide. The CAC was not provided with the Sauvie Island policies for consideration until after their work on the Natural Resources section was completed.

Policy 5.48 Encourage educational programs regarding the maintenance and restoration of wildlife habitat in the SIMC area, including programs addressing:

1. Maintenance and restoration of wildlife corridors.
2. Restoration and enhancement of wetlands, riparian areas, and grasslands.
3. Planting of native vegetation hedgerows.
4. Conserving Oregon white oak habitat and bottomland cottonwood/ash forests.
5. Use of wildlife-friendly fencing.

I think we should add parallel policies in the Wetlands and Riparian Areas section (Policy 5.17, Natural Resources p. 20) to match those in the Fish and Wildlife Habitat section (Policy 5.25, Strategies 5.25-2 through 5.25-6, Natural Resources pages 22-23). In the Riparian section, the first and sixth Strategies (echoed in the Wildlife Habitat section as 5.25-1 and 5.25-6) provide general direction about updating inventories, but do not include performing ESEE analysis or applying SEC overlays to protect newly identified resources.

Strategies 5.27-2 and -3 are about a riparian inventory done by Metro on land within 1 mile of the UGB several years ago. There are no strategies for doing an ESEE analysis and applying SEC overlays under Policy 5.17 as there is in Policy 5.25. If we do a new inventory, we should at least consider doing a new ESEE analysis and applying SEC overlays if appropriate.

Here is the relevant policy language for comparison:

Wetlands and Riparian Areas

Strategy 5.17-1: *Maintain inventories and continue to protect all significant riparian corridors and wetlands in accordance with applicable ESEE analysis reports.*

Strategy 5.17-2: *Update the inventory of riparian corridors, including water areas and adjacent riparian areas, to include significant riparian corridors identified in Metro's Urban Growth Management Functional Plan Title 13, Nature in Neighborhoods inventory within unincorporated Multnomah County.*

Strategy 5.17-3: *As appropriate, rely upon the findings contained within Metro's analysis of "Economic, Social, Environmental, and Energy" (ESEE) consequences to apply the Significant Environmental Concern overlay for streams (SEC-s) to riparian corridors that have been added to the updated inventory.*

Strategy 5.17-6: *Periodically review and consider new data to update the inventory of significant riparian corridors.*

Fish and Wildlife Habitat

Strategy 5.25-1: *Maintain inventories and continue to protect all significant wildlife habitats in accordance with applicable ESEE analysis reports.*

Strategy 5.25-2: *Periodically review and consider any new data to update the inventory of significant wildlife habitats.*

Strategy 5.25-3: *Update the inventory of wildlife habitat and associated wildlife corridors in accordance with Statewide Planning Goal 5.*

Strategy 5.25-5: *Conduct an analysis of "Economic, Social, Environmental, and Energy" (ESEE) consequences on wildlife habitat that has been added to the inventory.*

Strategy 5.25-6: *If warranted by an ESEE analysis, apply the Significant Environmental Concern overlay for wildlife habitat (SEC-h) to any newly identified significant wildlife habitat.*

Transportation System Plan

I'd like to request that we add to the Bike and Ped Solutions (Summary Table p. 37) a gravel or soft shoulder option for pedestrians that does not require hard surface paving.

I'd also like to ask staff to add detailed descriptions of more of the Transportation Demand Management options mentioned in Policy 13 in the TDM section (TD-1 through 8). The current options cover Sauvie Island's needs but there were additional options discussed for the West Hills such as car pools.

I support TSP Policy 11, which is taken directly from an existing West Hills Rural Area Plan policy² opposing creation of a Westside Bypass. The only problem with Policy 11 is that it doesn't include the background information about why the community opposes a Westside Bypass that was provided in the Westside Transportation Plan. It would be very helpful to include some of this context in the new TSP.

Policy 11: Mobility and Freight

Oppose placement of new regional roadways on Multnomah County roads, should such roadways be contemplated by any regional transportation authority in the future.

On p. 74, Policy 21, Strategy (a) has a typo – there's a missing space in the sentence after Ordinance.

² From the current West Hills Rural Area Plan's Transportation section:

"Western Bypass"

Regional transportation maps from the 1960's show a conceptual route for a "Western Bypass" roadway northward from Highway 26 in Washington County, over Cornelius Pass, through Sauvie Island, and then over the Columbia River to Washington State. However, no studies of such a route have been conducted by O.D.O.T. and none are planned. O.D.O.T. is currently studying a "Western Bypass" roadway to the south of the West Hills, which would run from Interstate 5 in Wilsonville to Highway 26 in Washington County. This study is currently in the Alternatives Analysis phase, which will review five alternatives for resolving transportation problems in southwestern Washington County. Once the alternatives analysis is completed, O.D.O.T. will subject the preferred alternative to an Environmental Impact Statement (EIS). The EIS must include projected changes to traffic volumes and character on Cornelius Pass Road as a result of any new roadway to the south.

Any future consideration of extending a "Western Bypass" roadway northerly from Highway 26 over Cornelius Pass would require consensus of the jurisdictions through which the roadway would pass, including Multnomah County. Such a roadway, while perhaps conducive to regional traffic, would bring major changes to the West Hills in terms of the following issues:

2. Negatively impacting agricultural and timber lands through which the roadway might pass;
3. Negatively impacting identified Goal 5 resources in the West Hills. Significant scenic views of the east face of the West Hills would be interrupted by a major roadway. Any roadway would cross several significant streams. And any roadway would critically interrupt significant wildlife habitat areas connecting Forest Park and the Coast Range.
4. Negatively impacting the rural character of the area. This change would be most significant, since placement of a major regional road corridor through the West Hills would lead to strong pressures to urbanize the West Hills.

POLICY 8: Oppose placement of regional roadways in the West Hills Rural Area, should such roadways be under consideration by any regional transportation authority in the future.

Closing Comments

It is my understanding that Metro is planning to offer several suggested changes to the Comprehensive Plan. I'd like to ask that the Planning Commission hold another hearing on the Comprehensive Plan before acting on those suggestions so that members of the public may review and comment on them.

I will offer one other bit of information in case you consider acting on these plans tonight. I know Mark Greenfield wanted to review the draft documents and provide suggestions, but he's been too busy to provide the time and attention they deserve. He asked me if there would be more than one hearing where he could submit comments. I told him I wasn't sure.

Thank you for your consideration.



Carol Chesarek