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

Subject: Additional Comments on the Draft Comprehensive Plan

Chair Ingle and Commissioners,

Thank you for the opportunity to provide some additional 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.

I will to elaborate on a few of my previous comments, add comments about Metro's suggested revisions, and make a few new suggestions. I will try not to duplicate my previous comments except as needed to ensure my comments make sense.

Comprehensive Plan

Maps

I mentioned in my previous comments that maps are important to provide local context in a plan that homogenizes our 4 very different rural areas. I forgot to mention that the Sauvie Island/Multnomah Channel Plan includes many maps and photos that provide ample local color and context. Unfortunately the other three rural areas have not, so far, been provided with the same quantity and quality of local maps and photos.

Through this process, it feels like 90% of the local information in the West Hills Rural Area Plan has been lost, including the context for many policies. In most cases, familiar policy language lives on, but the paragraphs explaining why the policy was important in the West Hills context has been lost or reduced to short mentions in a chapter introduction that's not as closely related to the policy language as we had in the West Hills Rural Area Plan.

I understand how and why we got here, but I think it is a serious mistake not to at least provide more good quality maps, which can help compensate for some of the lost local context in the text.

For example, compare the SIMC zoning map (Figure 1.1 on p. 14 of the SIMC Plan) to the zoning map provided in Figure 1, Page 4 of the Land Use Chapter of the draft Comprehensive Plan. The difference in usability is stark.

The SIMC Plan includes a historic (1919) soil survey map, a map of priority oak habitat, historic habitat maps, Geography Prior to Levees, and many more interesting resources, provided at usable scales. I'm not asking for all those maps and resources for all the other rural areas (the ones I want added are listed in my May 2 letter), but I wanted to show that as recently as last year this information was seen as valuable and relevant for one of our rural areas. I don't think it is unreasonable to ask that some additional (and better quality) maps be provided for our other rural areas.

The SIMC Plan also includes many photos which show unique and distinctive features of Sauvie Island, as opposed to the "generic farmland" and "generic forestland" photos in the draft Comp Plan, most of which could have been taken anywhere in the US or Canada – a farm tractor, a pile of logs, a grain elevator, a hosta plant, a river, a stream with grassy banks, a rural road, a Christmas Tree farm (OK, probably Pacific NW because it shows Douglas Firs). Aside from a handful of photos taken in the Columbia River Gorge (which for the most part won't be affected by this plan), and a few with views with Mt. Hood in the background, how many photos in the Comp Plan show a location that can be identified as being within Multnomah County, let alone in a particular rural area? I'm not asking for better local photos, I realize that's probably asking too much. But I do want more and better maps to help show that the other three rural areas have interesting and unique features too.

Natural Resources

Chapter 5 has several policies relating to stormwater management (Water Quality and Erosion Control). There are other stormwater policies in Chapter 11 (Public Facilities -- Stormwater Drainage, Policy 11.14). This can lead to some confusion, and it isn't clear why they are in separate chapters. Please consider combining these policies in one place.

I'm not comfortable that we've done all we should to address air quality and odor generation in policies 5.39 and 5.40, especially given the current attention to air pollution issues in the urban portion of the county, but I don't know enough about these topics to suggest better language.

Comments on Metro's Proposed Revisions

The Sauvie Island/Multnomah Channel (SIMC) Plan was adopted less than a year ago after a lengthy and extensive process that included many opportunities for public input and many Planning Commission hearings. Controversy during plan development resulted in detailed attention to language, with in depth discussion and compromises about language that were developed and reviewed by experts in land use law.

I'm told that Metro was invited to participate in the SIMC process as a member of the Technical Advisory Committee but that they declined. Metro did not participate in the Comprehensive Plan development process – they did not attend any advisory committee meetings.

Given the low level of Metro participation in these extensive and thorough processes, it is fascinating that they believe Metro knows better than the people involved in developing those

plans what language was intended. The words “complement” and “complementary” are used repeatedly in the SIMC plan, which strongly indicates that their selection was not accidental, but deliberate.

I don’t think it would be appropriate for the county to reopen the SIMC Plan less than a year after it was approved to incorporate changes suggested by an agency that declined to participate in developing that plan. I think it will be sufficient to update the maps of Metro’s properties and references to Metro’s planning documents in the County Comprehensive Plan.

My response to Metro’s other comments (underlines are my addition):

#1, p. 26 Discussing the characteristics of the West Hills

Metro requests deleting “ensure wildlife connectivity”, adding “promote fish and wildlife habitat,” “for county residents” and “recreational.”

As far back as Metro’s 1992 Metropolitan Greenspaces Plan, Metro recognized the importance of wildlife habitat connectivity for Forest Park:

“Forest Park Inholdings (Willamette River and Tualatin River watersheds)

Scattered privately owned lands in 5,000-acre city park, the largest protected naroral area in metropolitan area. Part of significant wildlife habitat, providing ecological connection between Columbia River, the Tualatin Valley and the Coast Range.”

Metro’s 2006 Natural Areas Acquisition Program Forest Park Connections Target Area Refinement Plan in Metro Resolution 07-3833 (also note the name of this target area: Forest Park Connections) includes this:

“The 2006 Natural Areas bond measure stated:

Connecting Forest Park to Rock Creek and the Westside Trail will keep important wildlife corridors intact and provide trail connections between the region’s largest urban park and Washington County. Acquiring key properties will capitalize on recent successful acquisitions of land adjacent to and beyond Forest Park, connecting the park with the larger Pacific Greenway.”

In their 2006 Natural Areas bond measure, Metro told the public that they were acquiring properties around Forest Park to preserve wildlife corridors and connections. It is disappointing that Metro is now trying to minimize this purpose and emphasize recreation uses instead.

The 2006 bond measure said “Approved bonds will:

- Preserve specified natural areas
- Protect and restore watersheds for improved water quality
- Protect streams, fish and wildlife
- Increase the presence of nature in neighborhoods “

Further, this is descriptive introductory language in the Comprehensive Plan, not binding policy language. There's no good reason to delete "ensure wildlife connectivity," it is one important purpose but doesn't preclude others.

Later, Metro seems confused about their mission. On page 2 of their May 2 letter, they say that "Metro's Parks and Nature mission is to protect water quality, fish and wildlife habitat, and create opportunities to enjoy nature close to home..." But lower down on p.2 in their suggested revisions they say that in the West Hills their goal is to "protect water quality, promote fish and wildlife habitat, and create opportunities for county residents to enjoy nature."

"Promote" is a much more ambiguous term which sounds like Metro plans only to provide cheerleading and public service advertisements about the benefits of habitat, but not protection.

I also find it odd that Metro suggested that they only want to "create opportunities for county residents to enjoy nature" (especially given their later objection to the county's policy referring to "rural residents"). What about residents of other nearby counties? Are they not supposed to enjoy these properties? Did Metro forget their indignant arguments about equity made in #7?

I oppose the Metro proposals to drop "ensure wildlife connectivity" and to add "county residents" and "recreational." Since Metro says their mission is to "protect water quality, fish and wildlife habitat, and create opportunities to enjoy nature close to home..." I suggest that we correct their suggested language to say "protect water quality, ~~promote~~ fish and wildlife habitat, and create opportunities ~~for county residents~~ to enjoy nature" instead.

Metro's explanation of their requested changes also says that the public lands in the Tualatin Mountains include a large and extensive network of interconnected trails. But the existing trail network that's open to the public is almost entirely in Portland's Forest Park, in the urban area and therefore not managed by the County, and not subject to this plan. This Comprehensive Plan manages the County's rural lands, and the Comprehensive Plan should not be expected to manage County rural lands as if they were urban, or as if they were part of Forest Park.

Metro seems confused about the purpose of the County Comprehensive Plan.

#2, Chapter 5 Natural Resources

p. 23, Fish and Wildlife Habitat. Policy 5.26. Metro objects to "within natural ecosystems." This language is in the current County Comprehensive Plan and doesn't seem to have resulted in problems for the County or landowners since it was adopted quite a long time ago.

I oppose Metro's proposed revision.

#3, Chapter 8 Parks and Recreation

p. 3, overview of Metro. Other agencies are content with a single paragraph overview of their role, but Metro wants a full page of promotional material. I politely suggest that Metro content themselves with a single paragraph such as has been given to other agencies, and remind them that this document is the Multnomah County Comprehensive Plan, not a Public Service Announcement about Metro.

I suggest this slimmed down language instead:

Metro. Metro is a regional government agency serving Multnomah County residents and the greater Portland area. In 1995, Metro assumed ownership and operation of a number of park and recreational facilities previously owned and operated by the County, including Oxbow Regional Park, Blue Lake Regional Park, Glendoveer Golf Course and Fitness Trail, Howell Territorial Park, Gleason Memorial Boat Ramp, Broughton Beach, Chinook Marine Facility, historic cemeteries, and a number of other facilities. Metro also owns and manages a number of natural areas and nature preserves in Multnomah County managed to protect water quality, fish and wildlife habitat, and provide citizen access to nature.

#4, Chapter 8, p. 4, Discussing Sandy River recreational facilities

I support this requested change.

#5, Chapter 8, p. 4 and 5, Figures 1 and 2

I support updating the maps in the Comprehensive Plan to correctly depict Metro's holdings.

I strongly oppose modifying the maps to treat "park" and "open space" as the same thing. As described in my May 2 letter to the Planning Commission, I believe that instead more detail should be added to show which agencies or non-profits own these lands.

#6, Chapter 8, p. 6, Discussion of planning documents.

I support deleting the words "land acquisition."

I oppose the suggested addition of a web site reference to Metro's Parks and Nature System Plan, which is unlikely to remain stable for the life of the County's Comprehensive Plan.

#7, Chapter 8, p. 8, Goals, Policies, and Strategies

I oppose the suggested removal of the word "rural". I agree with Stephanie Nystrom's comment at the May 2 hearing – "rural residents and visitors to its rural areas" covers everyone whether they live in the rural or urban area, in Multnomah County or elsewhere. Apparently Metro stopped reading after "rural residents," and their comments implying that the document attempts to limit access to rural residents are inappropriately critical. I would also politely remind Metro that this document is the County's Comprehensive Plan, which is a plan for the County's rural lands -- it does not "govern" urban County residents. I hope in the future that Metro will read more carefully before accusing the county of proposing a policy that is not equitable.

#8, Chapter 8, p. 8, Parks and Recreation Planning

I support the requested addition of Metro to Policy 8.1.

I don't object to the requested replacement of "consistent" with "compatible" in Policy 8.2, but "to complement" would be more consistent with related policy language (see next item).

#9, Chapter 8, p. 9, West Hills Policies and Strategies

I support removing the reference to Metro's Greenspaces Master Plan and Refinement Plan.

I strongly oppose the suggested removal of “are complementary to.” This language was deliberately requested to follow the language in the adopted SIMC Plan. There is nothing wrong with holding optional recreational development to a higher standard than “other forms of development” such as residential development that we are required to allow. I find Metro’s argument that recreational development should be allowed to be as destructive as residential development puzzling coming from an agency who’s stated mission includes protecting habitat.

We can’t prevent people from building homes on many properties -- we can only try to limit harm that might result. But we can and should hold optional recreational development to a higher standard. This is not to say that recreation is not important, it is to say that we should be careful where and what we allow recreation facilities, which can be quite harmful. We are not required to allow golf course development on forestry lands, for example. As noted above, the language in the SIMC Plan was the result of lengthy and thoughtful development. The West Hills representatives on the CAC asked to use the same language and the CAC, after deliberation and discussion (which resulted in some other minor changes), adopted this language as their recommendation. This is not a new term that was dreamed up to inconvenience Metro.

Further, Metro’s recently adopted NORTH TUALATIN MOUNTAINS ACCESS MASTER PLAN says (p.iii):

At the North Tualatin Mountains, the top priority is to protect water quality and preserve core habitat areas 30 acres or larger, including upland forests and streams that wildlife depend on for connections between Forest Park and the Coast Range. Within those parameters are opportunities to provide visitors with new destinations to experience nature.

This language indicates that Metro believes that opportunities to experience nature in this area will not undermine their stated top priority of preserving core habitat and wildlife connections.

I think it is also important to remember that these policies will apply to all recreational development in the West Hills, including private and for-profit facilities, and not just Metro projects.

#10 - #16 all request changes to the recently adopted SIMC Plan, and as stated above I oppose changing that plan.

Revisions Proposed by the Multnomah County Attorney’s office

Most of the requested changes are fine. I had concerns about just two, and one place with similar language that the County Attorney and Planning Commissioner might want to review because it wasn’t included.

Page 10 of the County Attorney’s letter addresses Policy 4.1 in Chapter 4 Forest Land. I am pleased to see that the Attorney’s office suggested removing the redundant conjunctions, but don’t understand the legal view of the language well enough to know if we need to keep the “and” at the end of (4) to ensure that all conditions listed in (1) through (5) are required, not just one of them, or if the “or” at the end of (5) is needed to make it clear that (6) can be used in

place of (1) through (5), at least as I read it. In other words, is the original meaning maintained if we delete all the conjunctions, or do we need to keep one or two of them?

Also, I'm not sure why Policy 3.6 in Chapter 3 Farm Land didn't get a similar clean-up, it has a similar use of conjunctions in a list.

Page 12 of the County Attorney's letter proposes changes to Policy 4.9 in Chapter 4 Forest Land. I am grateful to the Attorneys for unwinding an overly complex sentence but wonder if part of the intent was lost. As I read their proposed revision, it simplifies to "not allowing dwellings ... according to any or all of the following conditions:" This doesn't seem right. We don't want to allow dwellings on the types of lands listed, but we do want to allow dwellings on other Commercial Forest Use lands according to the conditions listed with this policy. I wonder if the policy should instead read something like (my additional language is highlighted):

- 4.9 Recognize differences among Commercial Forest Use zoning around the County by not allowing non-forestry related uses, such as residences dwellings on Commercial Forest Use lands on large commercial forest tracts adjacent to the National Forest Boundary or on lands not in the Mt. Hood National Forest or on large commercial forest tracts adjacent to the National Forest Boundary, but allowing them on other CFU lands according to any or all of the following conditions:"

Thank you for your time and attention.



Carol Chesarek