Background:

The 1997 SIMC Rural Area Plan included policy language about recreation activities that are "complementary" to natural and environmental resources, so use of the word is not new in this context.

In 2015, a new SIMC Rural Area Plan was developed and adopted by the county. Metro chose not to participate in that process. The SIMC plan included these policies:

> **8.9** Continue to coordinate with Metro to ensure compliance with Rural Reserve designations, implementation of Metro's Greenspaces Master Plan, and planning for Howell Park. In particular, work with Metro to:
>
> > Strategy 1. Ensure activities will complement natural and environmental resources of local and regional significance; and
> >
> > Strategy 2. Ensure that Howell Territorial Park uses and improvements maintain harmony with the rural character of the plan area as well as natural and cultural resources.
>
> **8.10** Support only those recreational activities within the SIMC area that are complementary to and do not negatively impact natural and environmental resources on Sauvie Island and along Multnomah Channel and its tributaries that are identified in Goal 5.

The Comprehensive Plan CAC adapted one of these SIMC policies for the West Hills, making it slightly less restrictive:

> **8.8** Support only those recreational activities within the West Hills area that are complementary to, and do not cause undue negative impacts on natural and environmental resources that are identified in Goal 5.

Because Metro expressed written concern that the word "complementary" would prevent any recreation in Goal 5 resource areas, more clarity was needed.

Proposal

We request that the draft Comprehensive Plan be amended to restore the language from the adopted SIMC Plan and that was approved by the CAC. To reassure everyone about the meaning of "complementary," we are providing definitions of complementary and undue, as well as an a more detailed explanation of the policy intent, to provide assurance that these policies, are not intended to block all recreation in Goal 5 resource areas. Lastly, we ask for an explicit statement that subarea policies control where there is overlap with countywide policies.

These four elements are presented below.

1. New Definitions to add, probably in the glossary:

Complementary: *Going together well; working well together; harmonious*.

Undue: *Not appropriate, unsuitable.*

We also suggest additional language for Chapter 8 (below) to explain how the definition of *complementary* relates to the parks and recreation policies, making it clear that some recreation can be allowed.

2. Clarify relationship between subarea and countywide policies

We couldn't find a statement in the Comp Plan that makes the relationship between the subarea specific policies and the countywide policies explicit. We've all been assuming that where they overlap the subarea specific policies would control, so we would like to add this statement for clarity:

> *Where subarea specific policies apply and overlap with countywide policies, the subarea policies control.*

That sentence could go in Chapter 8, but since there are subarea specific policies in several chapters and it should apply to all of them, we suggest that it be added in Chapter 1, p. 22, in the section about Subareas, near this language:

> "Many of those former Rural Area Plan policies and strategies are appropriate to apply to the entire County, while others continue to be unique to specific subareas. This Plan includes narrative information describing unique conditions or circumstances in each of the subareas in order to continue to address the unique attributes of specific subareas."

3. Language to add in Chapter 8, Parks and Recreation (in blue):

Key Planning Issues and Supporting Information

A number of key planning issues affect parks and open space planning policies and practices in the rural portions of Multnomah County:

….

• **Balancing recreational use with protection of natural resources.**

Oftentimes, recreational facilities are located within environmentally sensitive areas where it is important to balance recreation needs with natural resource management and protection objectives, particularly for riparian areas and wildlife habitat. This issue was raised by community members during preparation of this Comprehensive Plan and a number of policies direct the County to balance these two different types of objectives.

In the subarea policies for SIMC and West Hills, while a high bar is intended for recreational development in Goal 5 resource areas, passive recreational and educational

use without degrading natural resources is acceptable. Appropriate opportunities to experience enjoyment of resources can be allowed, to the extent it can be done without impairing them. When there is a conflict between conserving, restoring and enhancing resources and providing for enjoyment of them, the conservation, restoration and enhancement are to be predominant.

4. Chapter 8 policy language to be restored to the original versions

GOAL, POLICIES, AND STRATEGIES

Goal: To help meet the recreational needs of Multnomah County rural residents and visitors to its rural areas through support of, and coordination with local, regional, state, and federal agencies that manage recreation facilities and sites within the County.

Policies and Strategies Applicable County-wide

The policies in this section focus on coordination with other agencies in planning for and providing recreational facilities and services and with balancing recreational needs with goals for natural resource protection. Additional related policies are found in Chapter 5 of this plan and in the County's Transportation System Plan (referenced in Chapter 12).

Parks and Recreation Planning

8.1 Support efforts of the Intertwine Alliance and other organizations in establishing a coordinated approach to create and maintain a strong, interconnected regional network of parks, trails, and natural areas.

8.2 Encourage the development of recreation opportunities by public agencies and private entities consistent with wildlife habitat and wildlife corridor protection.

8.3 Coordinate with other agencies in strategically siting new public recreational facilities to take advantage of existing infrastructure that allow for multi-modal access opportunities and shared parking. An example would be joint use of park and school facilities by locating them adjacent, or close, to each other.

> ***Strategy 8.3-1:*** *Include provisions in the Zoning Code for privately owned and operated recreational facilities as conditional uses in appropriate zones.*

8.4 Ensure that the residents of areas outside of the urban growth boundary are represented on parks and open space issues.

> ***Strategy 8.4-1:*** *Encourage Metro to appoint residents representing different rural areas of Multnomah County to Metro's parks and greenspaces citizens' advisory boards.*

8.5 Consider the impacts of proposed recreation facilities on nearby private properties and require applicants to avoid and minimize significant adverse impacts to nearby properties.

West Hills Policies and Strategies

8.7 Support the natural systems and recreational values of Forest Park and adjacent areas in concert with the City of Portland, Metro, and other agencies.

> ***Strategy 8.7-1:*** *Promote and provide incentives for voluntary use of conservation easements and habitat protection by property owners.*

8.8 Support only those recreational activities within the West Hills area that are complementary to ~~consistent with~~, and do not cause undue negative impacts on natural and environmental resources that are identified in Goal 5.

8.9 Continue to coordinate with Metro to ensure compliance with Rural Reserve designations, implementation of Metro's Greenspaces Master Plan, and planning for Howell Park. In particular, work with Metro to:

> Strategy 1. Ensure activities will complement ~~be consistent with~~ natural and environmental resources of local and regional significance; and
>
> Strategy 2. Ensure that Howell Territorial Park uses and improvements maintain harmony ~~are consistent with~~ with the rural character of the plan area as well as natural and cultural resources.

8.10 Support only those recreational activities within the SIMC area that are complementary to ~~consistent with~~ and do not negatively impact natural and environmental resources on Sauvie Island and along Multnomah Channel and its tributaries that are identified in Goal 5.