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October 16, 2009

To: Metro Reserves Steering Committee and Core 4

From: Mike Houck

Re: Urban Greenspaces Institute Input on Reserves and Making

**Greatest Places Recommendations** 

Our comments are in response to both the Making the Greatest Place, strategies for a sustainable and prosperous region and on the Reserves Process on behalf of the Urban Greenspaces Institute, the Coalition for a Livable Future's natural resource working group, and as a member of the Reserves Steering Committee. A more completed set of comments on the COO report were submitted in a separate letter on October 15<sup>th</sup>.

We are supportive of the COO's report as it relates to:

- 1). Focusing future growth in centers and within the existing Urban Growth Boundary;
- Focusing on maintaining existing assets;
- 3). Increasing options for travel;
- Addressing Climate Change; and
- Guiding Principles.

However, we feel strongly that two concepts need to be integrated throughout the COO report and that should guide the Reserves designations. They are Green Infrastructure and Climate Change, both of which are interrelated. Investing in green solutions to water quality, flood reduction, and responding to Climate Change through adaptation will produce multiple benefits for every dollar of private and public money spent. These concepts are relevant to the Reserves process both with regard to how Urban Reserves are eventually developed and the concept planning that should precede urbanization.

The COO report states, "Energy instability and climate change require us to rethink everything—from where we live to where we get our food to how we get around." We agree. The region needs to move beyond mere mitigation of carbon emissions and incorporate Adaptation into

regional growth management strategies, including addressing the potential for increased flooding, urban/wildland interface wild fires, landslides and increased stormwater runoff in our residential neighborhoods. Better protection of natural resources inside the UGB, avoidance of UGB expansions onto floodplains, stream corridors and steep slopes, and better use of the region's green infrastructure must be incorporated into the region's response to Climate Change.

A key principle of the COO's report is to "Protect our urban growth boundary." Again, we agree. But we need to <u>simultaneously</u> protect, restore and better manage our green infrastructure, including natural resources, urban forest canopy, and access to nature within the existing UGB and Urban Reserves. Likewise, we strongly support using land inside the UGB more efficiently, but only if we simultaneously protect water quality, fish and wildlife habitat and ecosystem health inside the boundary while we limit unnecessary expansion into farmland, forest land and onto floodplains and natural ecosystems. Using developable land inside the UGB more "efficiently" must not be at the expense of ecosystem and watershed health.

We strongly support the COO's recommendations that we provide more protection for farmland. However, we feel that a complementary commitment to protect natural resources, in both Rural and Urban Reserves, is necessary. Designation of Urban Reserves should minimize loss of the region's most significant landscape features, floodplains, wetlands and fish and wildlife habitat. When designating urban reserves, we should leave space---including rural reserves when appropriate---between them and our neighbor cities so those cities can retain their identities and achieve their own aspirations, while protecting the entire region's sense of place through retention of significant landscape features.

We agree with the COO's report that the Core Four should make good on this commitment to working farm and forest families by pursuing additional actions to keep the farms and woodlots in the reserves available for food and fiber production. But, However, it's just as important that they make good on the promise to the region's residents that we will maintain a high quality of life in both the urban and rural landscapes by providing ready access to nature nearby and protection water quality and ecological values that all the region's residents have repeatedly told us they expect to be delivered by this planning effort.

**Extent of Rural Reserves**: Responding to comments from state agencies and Clackamas County's preference for fewer, smaller Rural Reserves, our position is that the purpose Rural Reserve designation is not <u>solely</u> to respond to threat of urbanization, while that is clearly of paramount importance.

We have understood the function of Rural Reserves to assure urban expansion does not occur in those landscapes that contribute to the region's sense of place, that are ecologically important, and that are important working landscapes. While we concur that designating an area that possesses these qualities does not "protect" that area, per se, we do feel it is important for the region to acknowledge, through Rural Reserve designation those landscapes that perform one or more of the functions listed.

We also concur with 1000 Friends of Oregon's recommendation that areas that have any one of high value farm, forest or ecological values be considered for Rural Reserves status. Of course those areas that possess a mosaic of these features are even more appropriate for Rural Reserve consideration. We have noted those areas in our UR discussion and map annotations.

Site Specific Comments: What follows are comments specific to the sites discussed at the October 14<sup>th</sup> Reserves Committee Meeting. I have included maps of the Urban and Rural Reserve areas that were discussed that are keyed to the following comments. I have numbered my comments to coincide with the numbers on each page of maps. One caveat regarding our comments: Our recommendations are based on documented natural resource values (floodplains, habitats of concern, stream corridors and wetlands, Oregon Department of Fish and Wildlife Conservation Priority Areas, The Nature Conservancy Priority Areas and other layers in the Regional Natural Landscape Inventory), the one exception being where there is a mosaic of natural resource and foundation agricultural lands. Areas in blue on the attached maps are Natural Landscape Features. There may be other factors, such as serviceability or governance that would disqualify an area as an Urban Reserve, which we did not take into consideration in our analysis.

## RR = Rural Reserve

Map 1: URAA: Yes to northern area, South section should be RR

UR 13: Yes UR, but stream protection

UR Z: Buttes to west should all be RR, not UR; UR to east okay, but with

Stream protection

Map 2: URY: Yes UR, but with significant upland forest and stream protection

Undesignated area south of URY should be RR with area north of

Clackamas River RR.

Map 3: URT, yes UR

UR U, yes UR

UR W, yes UR, but protection of Newell Creek and steep slopes

Adjacent to Newell Creek

UR 12, should be undesignated

UR X, should be RR, as well as all areas west of URX in RR

Map 4: UR R, No, should be RR

URS, okay as UR from natural resource perspective

UR 10, Major concern is impact on adjacent Wilson Creek UR 11, Major concern is impact on adjacent Wilson Creek

Map 5: UR O, okay UR

UR P, okay UR

UR Q, No UR designation, but if designated UR protect significant Forest stand

Map 6: UR N, left portion okay as UR, but stream corridor to east protect

UR M, okay as UR with stream protection

UR L, no should be RR and area between UR M and UR L should

All be RR

UR 9, okay as UR, although steep slopes are constraint

UR K, okay as UR but enhanced stream protection

UR 7, southern portion okay as UR, but Chicken Creek north

Should be in RR designation (see map 7)

Map 7: UR 7, south of Chicken Creek and floodplain okay as UR, everything

From southern floodplain of Chicken Creek north should be RR

UR 8, western portion okay as UR, eastern portion RR

Map 8: UR J, should all be RR, adjacent to Tualatin River National Wildlife

Refuge and slopes of Bull Mountain

UR I, only portion cross hatched on map should be UR, rest should be

Designated RR

Map 9: UR H, RR

UR 6, RR

UR 5, RR based on Agricultural/Natural Resource Mosaic

Map 10: UR G, West and southern portion as indicated on map should be RR

NW corner, UR

Map 11: UR D, okay for UR

UR E, should be designated RR based on both agricultural and floodplain Area was inundated in flood of 1996 and likely to expand over time as

Floodplain; unsuitable for residential development.

UR F, southern portion should be RR, northern portion okay for UR, with

stream protection and restoration.

UR 3, Agricultural and Natural Mosaic, should be RR

Map 12: UR C, Okay as UR but we agree with 1000 Friends observation that

The area should be smaller in size. Furthermore, the boundary adjacent to be pulled back considerably to the east of McKay Creek (as noted by arrows on map) and north of floodplain and tributary stream to McKay

Creek.

UR 2, RR based on agricultural and natural resource mosaic

Map 13: UR 1, All of UR 1 west of cross hatched area should be RR UR A, both are okay for UR, but they seem to be highly constrained By slopes and streams.

Map 14: UR 2, Should be RR owing to mosaic of agricultural and natural resource Lands
UR B, Small area in SE corner okay for UR, but rest to the west should Also be RR due to Rock Creek corridor.

Map 15: UR 14, Troutdale. We are not aware of the exact boundaries of this UR Area, but have significant concerns if it is adjacent to the proposed RR Area associated with the Sandy River. We strongly support this RR Designation. There appear to be significant stream corridors associated With UR 14 which either should disqualify it as an UR or would Significant stream protection if it were designated an UR.

Respectfully,

Mike Houck, Executive Director

## Comments on Urban and Rural Reserves October 15, 2009

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