



**WEST MULTNOMAH**  
Soil & Water Conservation District

DRAFT – STAFF RECOMMENDATION -- DRAFT

Multnomah County Planning Commission  
c/o Kevin Cook  
Multnomah County Land Use Planning Office  
1600 SE 190th Avenue  
Portland Oregon 97233-5910

RE: Metro Park and Nature's North Tualatin Mountains Access Master Plan  
(Case File: T3-2017-9165 / T4-2017-9166 / EP-20176780)

Dear Multnomah County Planning Commissioners,

The West Multnomah Soil & Water Conservation District is a public service district dedicated to the conservation of soil and water resources for people, wildlife and the environment. Our service territory is that portion of Multnomah County west of the Willamette River, all of Sauvie Island including the Columbia County portion of the Island and a portion of Washington County that lies within an area in the north Tualatin Mountains known as Bonny Slope.

The West Multnomah Soil & Water Conservation District supports Metro Parks and Nature's application for a Quasi-Judicial Revision to the Multnomah County Comprehensive Plan to adopt Metro's North Tualatin Mountains Access Master Plan and for the necessary land use permits to develop park related parking, trails, restrooms and related amenities for Metro's Burlington Creek Forest. Our comment provided here relates most directly to the approval criterion – Significant Environmental Concern (SEC) and Erosion and Sediment Control.

Our support for Metro's application stems from our view that Metro's Access Master Plan recognizes the importance of providing for core habitat and natural area at landscape level consistent with the District's goals for Healthy Soil, Habitat and Biodiversity and Water Quality as described in our Long-Range Business Plan. We also feel that providing public access to nature is important to the region because these opportunities cultivate the public's understanding and support for the conservation of natural resources – which we all know is vital to the livability and sustainability of our region. We share a similar goal in our work as described in our Long Range Business Plan – Cultivate Land Stewards of All Ages.

Public access to nature can take many forms and it is not within our purview here to suggest we support fully the specifics of what Metro is proposing for related parking, trails, restroom and related amenities for Metros' Burlington Creek Forest. But we do support the context and

the general scope of Metro's proposed trail development based on our experience in providing forest conservation assistance to private landowners in the North Tualatin Mountains. This assistance, both technical and financial, takes place with individual property owners and residents, but also in the context of the greater forested landscape. This greater landscape conservation context takes into account how our forest conservation assistance on private lands interfaces with ecological, social and economic goals that span the juxtaposition of forestland ownership, both public and private, in the north Tualatin Mountains. In this regard, we support the Access Master Plan because of the 1300 acres of Metro's forest ownership in the north Tualatin Mountains, the Access Master Plan leaves 970 of those acres as core habitat not subject to multi-use trail development and related parking, restrooms and other developed amenities. Further, from a vegetative cover perspective, the Burlington Creek Forest property contains the most common forest cover type in our region (Douglas-fir) – a forest type that is not threatened by the type of public use proposed in the Access Master Plan.

Our support does not come without qualification.

- Soil Erosion and Water Quality -- We agree with expressed concerns that Metro has not provided enough technical support for the proposed multi-use trails in the Burlington Creek Forest to alleviate concerns over soil erosion and impacts to water quality from both trail construction and use. As the permitting process unfolds, we ask the County to be diligent in seeking the requisite design plans showing specificity in trail location, density and the specific best management practices to control erosion, protect water quality and provide for fish passage at stream crossings. In addition, a water quality monitoring plan should be a condition of approval of Metro's application.
- Fish and Wildlife – We also agree with expressed concerns that the lack of baseline monitoring data about existing fish and wildlife use does weaken Metro's ability to fully understand the impacts of the proposed trail development and intended use to fish and wildlife; specifically red legged frogs and elk. However, we are confident that the development of a rigorous monitoring plan based on specific concerns about unwanted impacts to fish, frogs, elk and other identified wildlife – and Metro Parks and Nature's commitment to adaptive management measures should the monitoring show that unwanted impacts are indeed occurring – will be sufficient to guide intended trail use moving forward. Our recommendation is that the County make this type of fish and wildlife monitoring plan, and attendant commitment to adaptive management, a condition of approving Metro Parks and Nature's application. The District is willing to help Metro develop such a plan because by necessity it will need to cover the greater forested landscape surrounding the Burlington Creek Forest, much of which is privately owned land. We anticipate the results of this wildlife monitoring plan will not only inform management and public use of the Burlington Creek Forest, but our own work in providing technical and financial forest conservation assistance to surrounding private lands.

- Build Trust with the Local Community – We request that the County urge Metro to develop a formal advisory structure for the local property owners and residents that surround the Burlington Creek Forest so they can have meaningful interaction with Metro in the management, public use and monitoring of the Burlington Creek Forest. The last thing we want to see is continued polarization between Metro and those that live proximate to the Burlington Creek Forest. We recognize that setting up this type of structure is unique in its idea and challenging to accomplish. The Oregon Department of Forestry’s (ODF) State Forest Advisory Committee – which provides a forum for citizens and interest groups to discuss issues, opportunities and concerns, and offer advice and guidance to ODF’s implementation of the Northwest Oregon State Forests Management Plan – is a model that comes to mind for serving this need; though for its application to the Burlington Creek Forest, it would be implemented on a much smaller scale geographically. The District is willing to facilitate the development of such an advisory structure so local residents feel they have a voice in Metro’s management of the Burlington Creek Forest property.

We would like to close by thanking Metro Parks and Nature for being a leader in conservation for our region. It is commendable the Metro Parks and Nature staff are willing share their expertise with partner natural resource agencies and organizations such as ourselves. Further, Metro Parks and Nature staff are often found serving in leadership positions in developing regional conservation strategic action plans and tools that support The Intertwine Alliance Regional Conservation Strategy. Such demonstrated commitment to natural resource conservation gives the District the confidence that Metro has the capacity and expertise to implement the North Tualatin Access Master Plan and the proposed trail development in the Burlington Creek Forest. We feel that the County’s approval of Metro’s application – with the conditions we recommend herein – captures the opportunity for all of us to better understand fish, wildlife and water quality interactions with recreational trail development and use.

Sincerely,

Terri Preeg Riggsby  
Board Chair and Zone 5 Director  
West Multnomah Soil & Water Conservation District

cc: West Multnomah Soil & Water Conservation District Board of Directors; Metro Parks and Nature