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Tim Knapp, Mayor

July 14, 2010

Urban and Rural Reserves Specialist
Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

**Re: Objections – Urban and Rural Reserves
Metro Ordinance No. 10-1238A**

Dear Urban and Rural Reserves Specialist:

Please accept the following objections to the urban and rural reserves, as codified in Metro Ordinance No. 10-1238A, on behalf of the City of Wilsonville. Wilsonville is located in both Washington and Clackamas Counties and has been directly involved in decisions made by Metro and both counties relative to the reserves. Wilsonville now has large areas of both urban and rural reserves adjacent to our city limits.

To put Wilsonville's future growth in perspective, we note that our community currently has:

- Over two million square feet of fully constructed but vacant commercial and industrial floor area;
- More than 1,000 acres of largely undeveloped land within the Urban Growth Boundary that has not yet been annexed into the City; and
- Approximately 1,200 acres of urban reserve lands adjacent to the city limits.

Summary of objections:

The City of Wilsonville raises one primary objection, that an excessive amount of land has been designated within urban reserves. This leads to specific objections about land included within urban reserves in the Tonquin Geologic Corridor and in the Stafford area:

- 1) Land within the Tonquin Geologic Corridor (Metro area 5-F) has been inappropriately included within the urban reserves, in spite of being mapped for its significance in Metro's Natural Landscape Feature Inventory and therefore subject to OAR 660-027-0060(3). Metro did not adequately address the required Factors of OAR 660-027-0050 in designating Area 5-F in the Tonquin Geologic Corridor as an urban reserve, with no reasonable expectation that it can be developed to urban standards; and

2) An excessive amount of land within the Stafford area (Metro area 4-D, northeast of Wilsonville) has been included within urban reserves, with no reasonable expectation of receiving urban services.

Summary of participation:

The City of Wilsonville participated in the urban and rural reserves process, reserve hearings and open houses before the Clackamas County Planning Commission, Clackamas County Board of County Commissioners, and the Metro Council on a number of occasions during 2009 and 2010. Wilsonville Mayor Tim Knapp served as the “Other Cities of Clackamas County” representative to the Metro Urban and Rural Reserves Steering Committee and participated actively in discussions. Testimony before these governmental bodies has been presented orally and in writing by different City staff members, Wilsonville Mayor Tim Knapp, City Councilors and Planning Commissioners. Examples include:

- August 10, 2009 – oral testimony to Clackamas County Planning Commission;
- September 8, 2009 – oral and written testimony to Clackamas County Board of County Commissioners (copy attached – **Exhibit 1**);
- October 13, 2009 – oral testimony to Metro Council (with hard copies of maps submitted – **Exhibit 2**);
- January 21, 2010 – oral and written testimony to Metro Council (copy of City Council Resolution 2225 attached, with maps – **Exhibit 3**);
- February 17, 2010 – written testimony to Metro Council (copy attached – **Exhibit 4**); and
- May 18, 2010 – written testimony to Metro Council (copy attached – **Exhibit 5**).

Explanation of objections:

Primary Objection: The number of acres proposed for urban reserves exceeds the statutory 50-year limit {ORS 195.145(4)}. This may have contributed to Metro’s decision to include an excessive amount of land within the Tonquin Geologic Corridor and land within the Stafford area as urban reserves.

Metro has designated 28,615 acres as urban reserves, intended to be for a 50-year time period. The amount of land included in urban reserves exceeds the statutory 50-year limit, by underestimating the capacity of the current UGB, in at least three ways.

First, Metro assumes that the existing urban zoning, adopted and acknowledged by each city and county, will not be realized within the 20-year time period of the urban growth boundary (UGB), absent a demonstration that public investments or policies are currently in place or underway to cause the zoned level of urban development to happen. Assuming that existing planning and zoning will not be met and the investments will not be made over the 20-year UGB planning period is unrealistic, does not meet the requirements of ORS 197.296 and Goal 14, and is contrary to the methodology used by the Department of Land Conservation and Development in evaluating other UGBs. Given the high cost of providing urban infrastructure to greenfield UGB expansions (Damascus and North Bethany provide examples), it is predictable that densities within the existing UGB will increase over time, but Metro appears to have minimized this fact in their assumptions about future growth.

To assume that densities allowed by zoning will not be met over a 40–50 year time period is not rational and it is a statement that the Metro Council does not believe in or support the acknowledged land use, transportation, and public facility plans of its partner jurisdictions within the region. If Metro truly believes that the cities and counties of the region cannot be built-out as projected, Metro must clearly state how the local plans are inaccurate. Metro should also have objected to past periodic reviews of its partner cities and counties on that basis.

Second, and related to the first point above, Metro assumes that cities will meet their current zoning only if certain investments are made—such as in infrastructure, urban renewal, various subsidies, or waivers—and Metro requires a level of certainty about those investments before relying on them to assume that higher densities are achieved in any city. However, those cities all have acknowledged public facilities plans that “*describe[] the water, sewer and transportation facilities which are to support the land uses designated in the appropriate acknowledged comprehensive plans...*” for the 20-year planning period. OAR 660-011-0005(1), (4). Public facilities plans also include cost estimates, estimates of when each facility project will be needed, and discussions of funding mechanisms.

Therefore, it would be more logical for Metro to assume that these 20-year public investments will at least be made over the 40–50 year time period, and adjust its UGB capacity estimate accordingly. By adjusting the UGB capacity estimate, Metro would also be reducing the need for urban reserve acreage.

Third, Metro’s capacity estimate for the UGB assumes there will be no upzoning over either the 20- year or 50-year period. There is no evidence for that assumption, and it is contrary to past experience. Metro Councilors have commented repeatedly that roughly 95% of the urban development that has occurred within the region over the last 25 years has taken place on land that was already in the UGB at the start of that period. In other words, relatively little of the region’s urban growth has occurred within newly urbanized land. In analyzing the capacity of its UGB, Metro is required to examine the housing density, mix, and trends over at least the past five years, or since the last periodic review, and use that in its assessment of future land needs and trends. Evaluation of a UGB requires analysis of the full zoning capacity as well as upzoning potential. Although Metro has not yet completed its UGB analysis, its reserves analysis is for a longer time period and therefore must rely upon the same legal and factual

assumptions as it will for its UGB decision. In its reserves analysis, Metro must still have an adequate factual and legal basis, and there is none for its assumption that there will be no upzoning by cities.

Metro continues to rely on its “Corridors and Centers” strategy to accommodate much of the expected population and employment growth in the region. The July 2004 ECONorthwest *Report on Corridors*, prepared for Metro, reviewed the planning and zoning for nine corridors and concluded that currently: “Corridors tend to be lower-density and more auto-oriented.” The Report shows that in 2004, the region had 41,907 gross acres of “Corridors,” of which 13,296 acres were zoned for single family and more than 5,400 acres were zoned “rural,” “agriculture,” or “forest” uses.

Although these facts have been raised in the reserves proceedings, we are unaware of evidence in the record to show what assumptions Metro has made about the future build-out of the corridors. However, to meet the region’s “2040 Growth Concept” requirements and market demands over the 20-year UGB period and the full 50-year reserves period, some part of the corridors will clearly be re-zoned to higher density and mixed uses.

Another important consideration when evaluating the overall extent of lands designated as urban reserves concerns the cost and feasibility of providing urban infrastructure, especially transportation improvements. The Metro Council adopted the 2035 Regional Transportation Plan (RTP) on June 10, 2010, which was in development concurrent to the Metro Urban/Rural Reserves process. According to Metro, the 2035 RTP “*presents the overarching policies and goals, system concepts for all modes of travel, funding strategies and local implementation requirements,*” and “*focuses on outcomes and achieving the region's 2040 Growth Concept – a publicly supported vision for directing growth toward centers, corridors and employment areas.*” See “2035 Regional Transportation Plan update,” <http://www.oregonmetro.gov/index.cfm/go/by.web/id=25038>.

Projects listed in the RTP are designed to support the region’s current UGB —“downtowns, main streets, employment areas and major travel corridors.” Given that the transportation needs of urban reserves are not addressed in the RTP, it increases the importance of a careful analysis of the costs of providing transportation improvements to potential urban reserves. The RTP lists nearly \$20 billion in overall transportation projects costs, many of which will go unfunded. See “Investing in transportation projects,” <http://www.oregonmetro.gov/index.cfm/go/by.web/id=139>.

Given that the region cannot fund needed infrastructure within the existing UGB, and the arguments noted above about excess lands added to the urban reserves, it raises questions about Metro’s findings relative to OAR 660-027-0050, that Areas 5-F and 4-D can realistically be urbanized and efficiently provided with urban infrastructure over the next 50 years.

Recommended remedy: Because Metro has underestimated the capacity of the UGB for both the 20-year UGB period and the 40-50 year reserves period, the 28,615 acres of urban reserves exceeds the 50-year time limit and may have resulted in Metro’s decision to include an excessive amount of land within the Tonquin Geologic Corridor and land within the Stafford area as urban

reserves. LCDC should remand the decision to Metro with direction to fully account for upzoning, rezoning, and meeting zoned densities over the reserves time period, and decrease the amount of urban reserves, particularly in areas 5-F and 4-D, accordingly.

Specific Objection 1: The inclusion of land within the Tonquin Geologic Corridor (Area 5-F) has not been supported by evidence in the record.

Land within the Tonquin Geologic Corridor (Metro area 5-F) has been inappropriately included within the urban reserves, in spite of being mapped for its significance in Metro's Natural Landscape Feature Inventory and therefore subject to OAR 660-027-0060(3). Metro did not adequately address the required Factors of OAR 660-027-0050 in designating Area 5-F in the Tonquin Geologic Corridor as an urban reserve, with no reasonable expectation that it can be developed to urban standards.

Even if it could be justified that a large area of urban reserves will be needed for future industrial development, we are unaware of evidence in the record that Metro adequately considered the unique characteristics of the Tonquin Geologic Corridor in choosing to include Area 5-F within the urban reserves to help address such a need. Specific to the Tonquin Geologic Corridor, important natural landscape features are intended to be designated as rural reserves based on their qualitative and locational characteristics. They must be located to "*limit urban development or define natural boundaries of urbanization, including plant, fish and wildlife habitat, steep slopes and floodplains.*" ORS 195.137(1), OAR 660-027-0005(2).

It is important to start with an understanding of the subject geography. There is a continuous natural resource corridor that connects the Tualatin River National Wildlife Refuge to the Tonquin Geologic area, to both Rock Creek and Coffee Creek to Coffee Lake.

The City of Wilsonville argued before Metro that Area 5-E (in Clackamas County) should be designated as a rural reserve, and also argued that the rural designation should be continued to the north into Washington County (5-F). Quoting Metro's staff report in describing Area 5-A, "*...part of the Tualatin National Wildlife Refuge, an important natural landscape feature that defines the extent of urbanization from the cities of Sherwood and Tualatin.*" We respectfully submit that, if that description applies in Area 5-A (and we believe it does), it applies just as well to Area 5-F, where much of the land is within the Tualatin River National Wildlife Refuge. Using that logic, area 5-F should be a rural reserve, defining the extent of urbanization from nearby cities.

Also attached is a copy of Metro's 2007 map labeled "Natural Landscape Features Inventory." The significance of that inventory was not lost on the State in establishing the Factors for designating Rural Reserves in OAR 660-027-0060(3):

"When identifying and selecting lands for designation as rural reserves intended to protect important natural landscape features, a county must consider those areas identified in Metro's 2007 Natural Landscape Features Inventory."

In spite of the fact that the Tonquin Geologic Corridor is prominently displayed on the 2007 Natural Landscape Features Inventory map, the National Wildlife Refuge was not even mentioned in Metro's description of proposed urban reserve Area 5-F, which is instead described as "*suitable for potential future industrial development and freight movement...*" It seems that Metro has chosen to disregard one of the region's most important natural resource areas, in spite of clear direction from the State to consider it. Metro produced a staff report, relied upon by the Metro Council in reaching its decision, that in one paragraph extolled the importance of the natural resources and landscape features of the Wildlife Refuge and the Tonquin area, and then followed it in the next paragraph with the statement that the area is suitable for industrial development — ignoring the fact that a contiguous swath of that land has already been acquired by the federal government US Fish and Wildlife Service, Department of the Interior, and included within the National Wildlife Refuge.

Metro's past history in protecting natural resources has been evidenced in two bond measures for open-space acquisitions, formally known as the 1995 and 2006 Natural Areas Program (including acquisitions within the Tonquin Geologic Corridor by Metro and support for federal acquisitions as part of the Tualatin River National Wildlife Refuge), Titles 3 and 13 of the Urban Growth Management Functional Plan, and Metro's Nature in Neighborhoods program, based in Chapter 3 of the Regional Framework Plan. Metro chose to ignore that history of resource protection to a significant portion of the Wildlife Refuge and Tonquin Geologic Corridor by designating the area an urban reserve.

The "Metro's Tonquin Geologic Area goals and objectives," dated January 2010 and located online at <http://www.oregonmetro.gov/index.cfm/go/by.web/id=28333>, states that Metro's Goal is to "*Protect unique geologic features that provide valuable wildlife habitat. Acquire additional lands needed for a future regional trail corridor connecting Wilsonville to Tualatin.*" Metro lists, under the heading of "1995 Natural Areas Program goals and accomplishments," several items, including:

- “• *Create a Tonquin Greenway and wildlife corridor connecting the Tualatin River National Wildlife Refuge in the north to the Willamette River in the south.*”
- “• *Preserve the remaining unique natural features, such as kolk ponds, in the Tonquin Geological Area, which were created by the Bretz (aka Missoula) floods.*”
- “• *Preserve riparian buffers and wetland areas in the Rock, Coffee and Mill Creek floodplains.*”

Metro continued the public-policy theme of protection for the Tonquin Geologic Corridor under the heading of "New focus for Metro's 2006 Natural Areas Program":

“Protect and preserve the area's rare geologic features, wetlands, ponds and riparian buffers. Secure additional sections of the 12- to 16-mile wildlife and trail corridor connecting the cities of Wilsonville, Sherwood and Tualatin and the Tualatin and Willamette rivers.”

How can Metro reconcile past and recent pronouncements that Metro should "*Preserve the remaining unique natural features... in the Tonquin Geological Area,*" "*Preserve riparian buffers and wetland areas in the Rock, Coffee and Mill Creek floodplains*" that compose the Tonquin area, and "*Protect and preserve the area's rare geologic features, wetlands, ponds and riparian buffers*"

with a new determination that overlooks the factors for a rural reserve determination in favor of unsubstantiated support for an urban reserve designation that indicates the Tonquin area is “suitable for potential future industrial development and freight movement?” Metro erred in designating any portion of the Tonquin Geologic Corridor as an urban reserve.

Of the eight Factors that the counties and Metro were required by OAR 660-027-0050 to consider in designating urban reserves, five are problematic in terms of the future urbanization of all of Area 5-F (Tonquin). Those are Factors 1, 3, 5, 7, and 8.

Factor 1. *Can (the area) be developed at urban densities in a way that makes efficient use of existing and future public and private infrastructure investments?*

The City of Wilsonville argued that there was no way that the Metro Council could properly and realistically conclude that designating the area as an urban reserve that supports “*future urban densities in a way that makes efficient use of existing and future public and private infrastructure investments.*” The City argued that there is no efficient way to provide a full range of urban infrastructure across a broad riparian zone and that there is no evidence that the area can be “*developed at urban densities.*”

Factor 3. *Can (the area) be efficiently and cost-effectively served with public schools and other urban-level facilities and services by appropriate and financially capable service providers?*

Given the topography and natural features of the Tonquin Geologic Corridor, it is difficult to imagine how the Metro Council could conclude that the area “*can be efficiently and cost-effectively served by appropriate and financially capable service providers.*” As recognized in this factor, financial capability is a significant issue for those of us in the business of providing urban services. Including land with significant natural features and enormous topographic limitations within the urban reserves does not give ample consideration to Factor 3.

Factor 5. *Can (the area) be designed to preserve and enhance natural ecological systems?*

This Factor is a major concern. Metro’s own documents, and even the language of the Oregon Administrative Rule, mention the significance of the Tonquin Geologic Corridor in terms of natural resources. The City of Wilsonville joined the members of the Agricultural – Natural Resources Coalition in arguing that this area should be designated as a rural reserve and questioned how the Metro Council could appropriately conclude that this area “*can be designed to preserve and enhance natural ecological systems*” while including it within the urban reserves.

Factor 7. *Can (the area) be developed in a way that preserves important natural landscape features included in urban reserves?*

As with Factor 5, above, the City argued that the Metro Council cannot realistically conclude that this area can be designated an urban reserve and that it “*can be developed in a way that preserves important natural landscape features included in urban reserves.*”

Factor 8. *Can (the area) be designed to avoid or minimize adverse effects on farms and forest practices, and adverse effects on important natural landscape features, on nearby land including land designated as rural reserves?*

The City of Wilsonville argued that the Tonquin Geologic Corridor cannot be urbanized and still “*be designed to avoid or minimize adverse effects on important natural landscape features.*”

The City of Wilsonville maintains that Metro erred in designating Area 5-F as an urban reserve and that Metro failed to adequately address the required factors of OAR 660-027-0050. This area qualifies as a rural reserve, simply because placing it in that designation would “protect important natural resource features.” Metro’s decision to add an excessive amount of land to the urban reserves may threaten the future of the Tonquin Geologic Corridor, including the Tualatin River National Wildlife Refuge.

Recommended remedy: Remand to Metro to delete the Tonquin Geologic Corridor (Area 5-F) from the urban reserves and designate it a rural reserve.

Specific Objection 2: An excessive amount of land within the Stafford area (Metro area 4-D, northeast of Wilsonville) has been included within urban reserves, with no reasonable expectation of developing to urban densities or receiving urban services.

The “South Stafford Basin” Urban Reserve Area 4-D is part of the largest contiguous expanse of urban reserves in the region (also including Urban Reserve Areas 4-A, 4-B and 4-C). The entire “Stafford Basin” urban reserve spreads from Wilsonville and Tualatin all the way to Lake Oswego and West Linn, along Stafford Road. None of the adjacent cities has either the inclination or the ability to provide urban services to more than a part of this expansive area, and Wilsonville will clearly not be able to serve Area 4-D. This urban reserve is outside of the area that the City has included within its aspirations for long-term growth and due to topographic issues and other considerations would be cost-prohibitive for Wilsonville to serve with urban services.

Factors 1 and 3, required to be considered in establishing urban reserves (OAR 660-027-0050) both emphasize efficiency in the provision of public infrastructure. A large portion of the Stafford basin can clearly not be provided with transportation improvements or other public infrastructure in an efficient manner.

“Factor 1. *Can (the area) be developed at urban densities in a way that makes efficient use of existing and future public and private infrastructure investments?* “

“Factor 3. *Can (the area) be efficiently and cost-effectively served with public schools and other urban-level facilities and services by appropriate and financially capable service providers?*”

Although one might argue that there are no longer any “*financially capable service providers*” the fact remains that the four cities surrounding the Stafford basin (Lake Oswego, West Linn, Tualatin and Wilsonville) have today, and will continue to have, limited resources for providing urban infrastructure. While each of the cities may provide services to parts of the Stafford area, even a combination of the cities will not be able to efficiently and cost-effectively provide services to the entire area. None of the cities has any intention of providing urban services to Area 4-D over the life of the reserves.

Recommended remedy: Remand to Metro to delete Area 4-D from the urban reserves.

Additional considerations:

Finally, the City of Wilsonville fully supports the decisions of both the Clackamas County Board of Commissioners and the Metro Council to designate the foundation farmlands of the French Prairie area, south of Wilsonville, as a rural reserve. We mention this here, just as we have in testimony to both Metro and Clackamas County, in order to preserve the opportunity to rebut any arguments that French Prairie should be designated as other than rural reserve.

The Commission recognized the importance—and finite quantity—of these characteristics in its administrative rule. Any lands identified as “foundation” by the Oregon Department of Agriculture by definition means that they automatically meet the rural reserve factors. Foundation lands cannot be designated as urban reserves unless there are findings and reasons explaining why they must be used for urban reserves, rather than other lands that are not foundation. OAR 660-027-0040(11). As noted in Oregon Administrative Rule 660-027-0060(4): “... a county may deem that Foundation Agricultural Lands or Important Agricultural Lands within three miles of a UGB qualify for designation as rural reserves ... without further explanation...” Thus, the Legislature provided for rural reserves because it recognized that the characteristics of the land base essential for one of Oregon’s most productive, and growing, industries—agriculture—is finite, significant, place-based, and not fungible. LCDC supported that in establishing the Oregon Administrative Rules applying to rural reserves.

Thank you for your consideration of these objections and comments.

Sincerely,



Tim Knapp
Mayor, City of Wilsonville
Mayor@ci.wilsonville.or.us

Copies: Clackamas County Board of Commissioners
Washington County Board of Commissioners
Metro Council

Attachments:

Exhibit 1 -- September 8, 2009 – written testimony to Clackamas County Board of Commissioners;

Exhibit 2 -- October 13, 2009 – hard copies of maps submitted with oral testimony to Metro Council;

Exhibit 3 -- January 21, 2010 – written testimony to Metro Council (Wilsonville City Council Resolution 2225 with maps);

Exhibit 4 -- February 17, 2010 – written testimony to Metro Council;

Exhibit 5 -- May 18, 2010 – written testimony to Metro Council;

Exhibit 6 – January, 2010 – Metro’s Tonquin Geologic Area Goals and Objectives



29799 SW Town Center Loop E
Wilsonville, Oregon 97070
(503) 682-1011
(503) 682-1015 Fax Administration
(503) 682-7025 Fax Community Development

September 8, 2009

Chair Lynn Peterson
Board of County Commissioners
2051 Kaen Road
Oregon City OR 97045

Chair Peterson and County Commissioners,

Thank you for this opportunity to provide additional information and to restate the City's position on Urban and Rural Reserve designations in the Wilsonville area. The City of Wilsonville has worked closely with the County Planning staff and the Policy Advisory Committee (PAC) as they have spent countless hours working through all the reserve factors in order to recommend reserve areas for your consideration. We also took part in the County Planning Commission's hearings on reserves.

The City supports most, but not all of, the PAC and Planning Commission recommendations as contained in the *August 31, 2009 Polling on Reserve Discussion Areas, with Input from Staff and Planning Commission*. We offer the following additional clarification:

Area 1: West of Wilsonville, South of Sherwood

Recommendations:

Urban Reserve – only one small area south of Wilsonville Road (Wilsonville area 9) and another along the east side of Grahams Ferry Road (a portion of Wilsonville area 10).

Rural Reserve – the area mapped as floodplain, wetlands and Tonquin geologic area (remainder of Wilsonville area 10).

Undesignated – all other areas previously studied should remain undesignated until jointly concept planned by the Cities of Wilsonville, Sherwood, and Tualatin.

The City supports the combined staff, PAC and PC recommendations to designate only a portion of the area for Rural Reserves. We support the *Clackamas County Board Priorities for Rural Reserves Map* identifying the



Tonquin geologic area and Coffee Lake wetlands as a priority for Rural Reserves. A Rural Reserve designation for these very important natural resource areas is consistent with the Washington County recommendation for Rural Reserves for the adjacent portion of the same natural resource area in Washington County. (See the *Washington County Revised Recommended Rural and Urban Reserves Draft Map* dated September 1, 2009, attachment 1). Note that OAR 660-027-0060 (3) contains the following language which is applicable to the Tonquin geologic area and Coffee Lake wetlands:

“When identifying and selecting lands for designation as rural reserves intended to protect important natural landscape features, a county must consider those areas identified in Metro’s February 2007 “Natural Landscape Features Inventory.”

The County Planning Commission and the PAC both identified land north of Tooze Road as appropriate for inclusion as Urban Reserves. Given the aforementioned Administrative Rule language applicable to the Tonquin geologic area and Coffee Lake wetlands, the City of Wilsonville recommends that only that small area of land north of Tooze Road and east of Grahams Ferry Road (a portion of that area referred to as “Wilsonville Area 10”), be included as Urban Reserve.

Please note that the City also supports the PAC and PC recommendation that a small area south of Wilsonville Road, and immediately west of the city limits (referred to as “Wilsonville Area 9”), be included as Urban Reserve.

Area II: French Prairie.

Recommendation:

Rural Reserve – all.

The City supports the PAC, PC and staff recommendations for Rural Reserve designation for this entire area. This area is foundation farmland. The hard edge of the Metro Urban Growth Boundary should remain in its present location at the south city limits of Wilsonville to protect this important agricultural resource.

Area III: East of Wilsonville

Recommendations:

Urban Reserve – only where requested by the City of Wilsonville.

The City supports the PAC Majority opinion to consider only Wilsonville’s area of interest as Urban Reserve. The City has looked carefully at a 50-year residential land need and the City’s ability to provide infrastructure in a fiscally responsible way, and has identified these lands, and only these lands, as our recommendation for Urban Reserves. The City of Wilsonville has neither the ability nor the

inclination to provide infrastructure to most of this area east and north of Wilsonville. (Please see attachment 2.)

Area IV: Stafford

Recommendations:

The City takes no position.

The City does not take a position on designations in the Stafford Basin, other than to express concerns about future traffic impacts on Stafford Road and the North Wilsonville/I-5 Interchange. The City of Wilsonville has neither the ability nor the inclination to provide infrastructure to the Stafford area.

Thank you for your consideration of this testimony and for all of your work towards establishing Urban and Rural Reserves.

Sincerely,

A handwritten signature in black ink, appearing to read "Arlene Loble". The signature is fluid and cursive, with the first name being more prominent than the last.

Arlene Loble
City Manager

Copies: Mayor Knapp and Wilsonville City Council

Attachments:

1. *Washington County Revised Recommended Rural and Urban Reserves Draft Map* dated September 1, 2009.
2. City of Wilsonville Proposed Urban and Rural Reserves, September 8, 2009.

Washington County

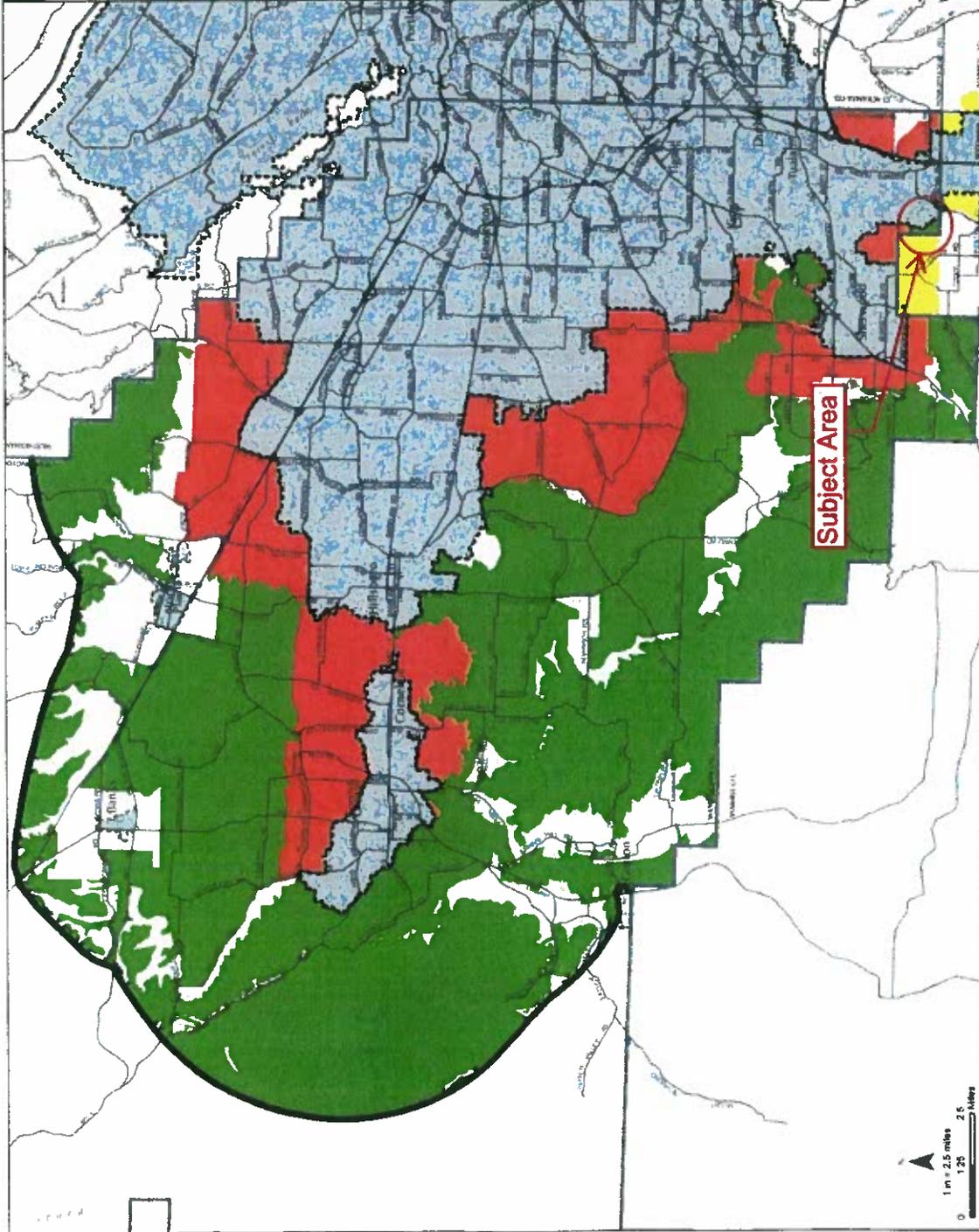
Revised Recommended Rural and Urban Reserves DRAFT

-  Recommended Rural Reserve
-  Recommended Urban Reserve
-  Recommended Urban Reserve in Clackamas County
-  Existing Urban Area
-  Extent of Reserves Study Area
-  Urban Growth Boundary
-  County Boundary

Disclaimer:

This information on the map was derived from data prepared on Washington County Geographic Information System (GIS). Care should be taken to verify the accuracy of the information and to assume no responsibility for errors, omissions, or incomplete information. The information is provided as a general guide only. The information is not intended to be used for any purpose other than that for which it was prepared. No liability is assumed for any errors or omissions.

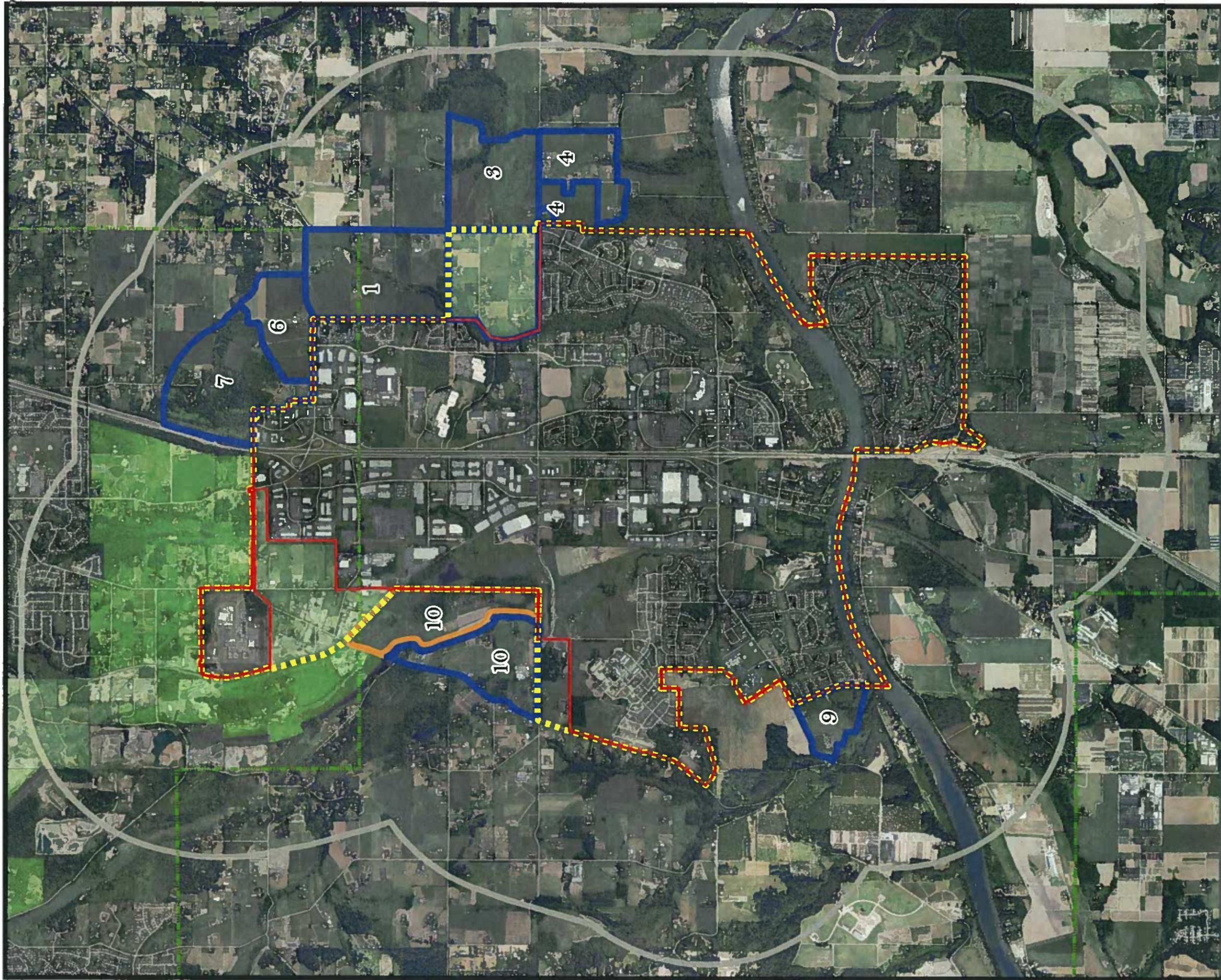
Washington County Long Range Planning Division
 155 North First Avenue, Suite 350 MS 14
 Hillsboro, OR 97124
 ph (503) 848-3619
 fax (503) 848-4412
 subplan@co.washington.or.us



Urban and Rural Reserves Staff Retiwt

September 1, 2009

Attachment 1



-  2002 UGB Expansion
-  2004 UGB Expansion
-  Proposed Urban Reserve Area
-  Proposed Rural Reserve Area
-  Current UGB
-  City Limits
-  UGB + One Mile
-  County Boundary



September 2009

Attachment 2

The City of Wilsonville Proposed Urban and Rural Reserve Areas

Note: All information is subject to change. Every effort is taken to eliminate errors and omissions but please contact the City of Wilsonville to confirm information before taking any action.

Outline of Testimony
October 13, 2009
Stephan A. Lashbrook
Assistant Community Development Director
City of Wilsonville

Urban Growth Report

The City of Wilsonville supports Metro's overall approach and the conclusions of the Urban Growth Report.

- The Portland region has demonstrated over the last 30 years that infill development and redevelopment are generally preferable and more efficient than outward expansion.
- The region has also proven that infill development and redevelopment can occur without sacrificing natural resources -- which are better protected today than at any point in the region's past.
- Local communities have discovered that they have limited ability to fund the infrastructure to accommodate significant outward urban expansion. Most local communities are looking to infill and redevelopment to help fund the maintenance of the existing infrastructure.

Urban Reserves

The City of Wilsonville supports recent decisions by both Clackamas and Washington Counties for Urban Reserves immediately adjacent to Wilsonville.

- We are most concerned about, and strongly support the inclusion of the Advance Road area (#4 on the attached map) – planned for two schools and a large park.

- Also, area #1 on the attached map is seen as an important addition in the City's efforts to provide infrastructure to the Frog Pond area (that was previously added to the UGB).
- We have serious questions about the inclusion of a large area south of Sherwood as an Urban Reserve. We have been told that this land is needed for future urban growth for two reasons: to provide Sherwood with employment land and to help support the planned I-5/99W Connector.
 - * We submit the attached maps showing natural resource areas and topography between Sherwood and Wilsonville and question whether these characteristics really lend themselves to either employment uses or the construction of a major arterial roadway.
 - * We remind all concerned of the environmental significance of the Tonquin Geologic Corridor and the Coffee Lake /Coffee Creek wetlands. The area is specifically listed in Metro's 2007 Natural Landscape Features Inventory – and OAR 660-027-0060 (3) references that inventory within the factors for Rural Reserve consideration.

Rural Reserves

The City of Wilsonville supports the designation of the French Prairie area (south of Wilsonville) as a Rural Reserve. We believe that protecting foundation farmland from conflicting uses will be increasingly important for the future of the region and the future of the planet. There are numerous reasons why this area should be a Rural Reserve, but its importance for Oregon agriculture should be sufficient reason.

Thank you !



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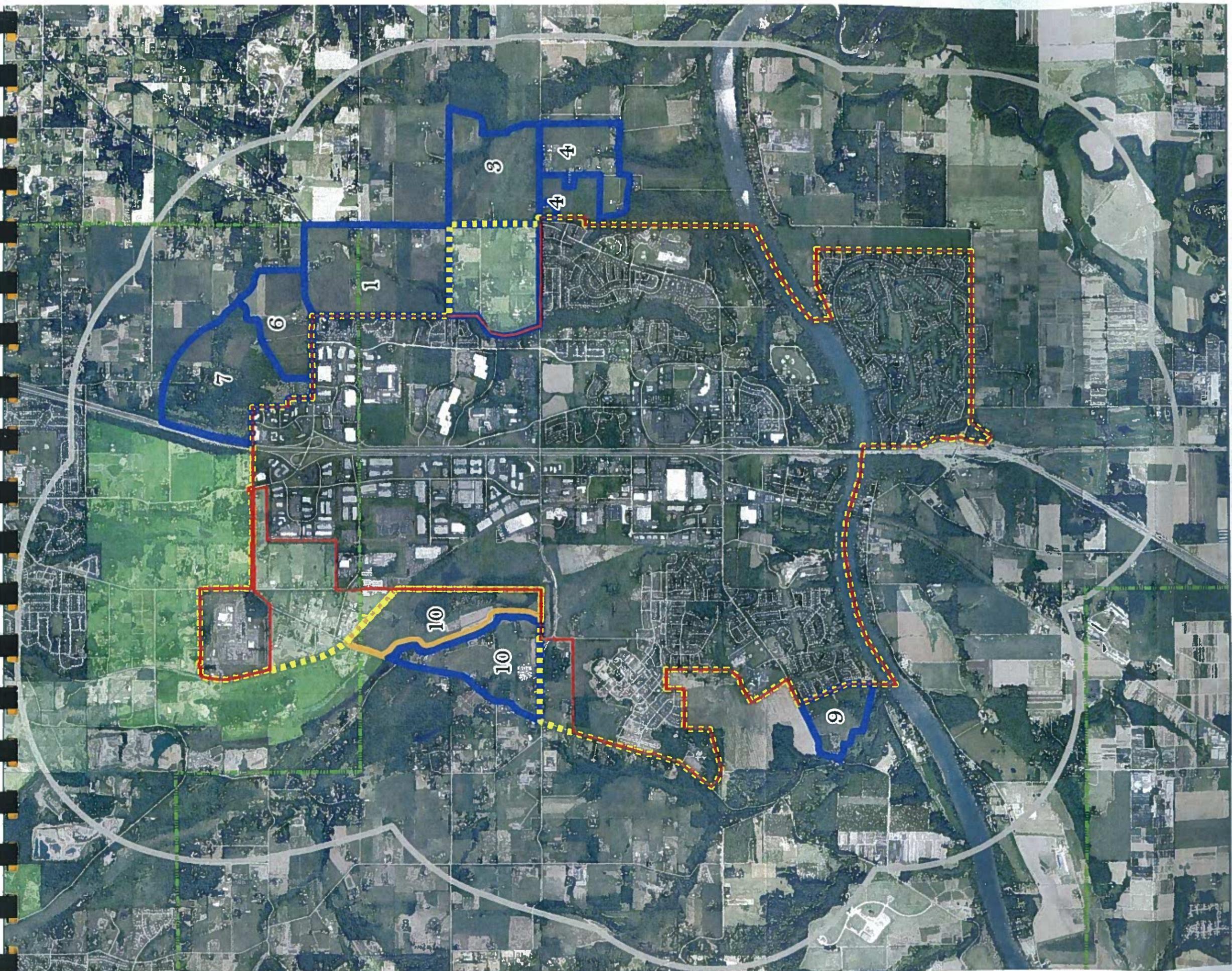
September 2009

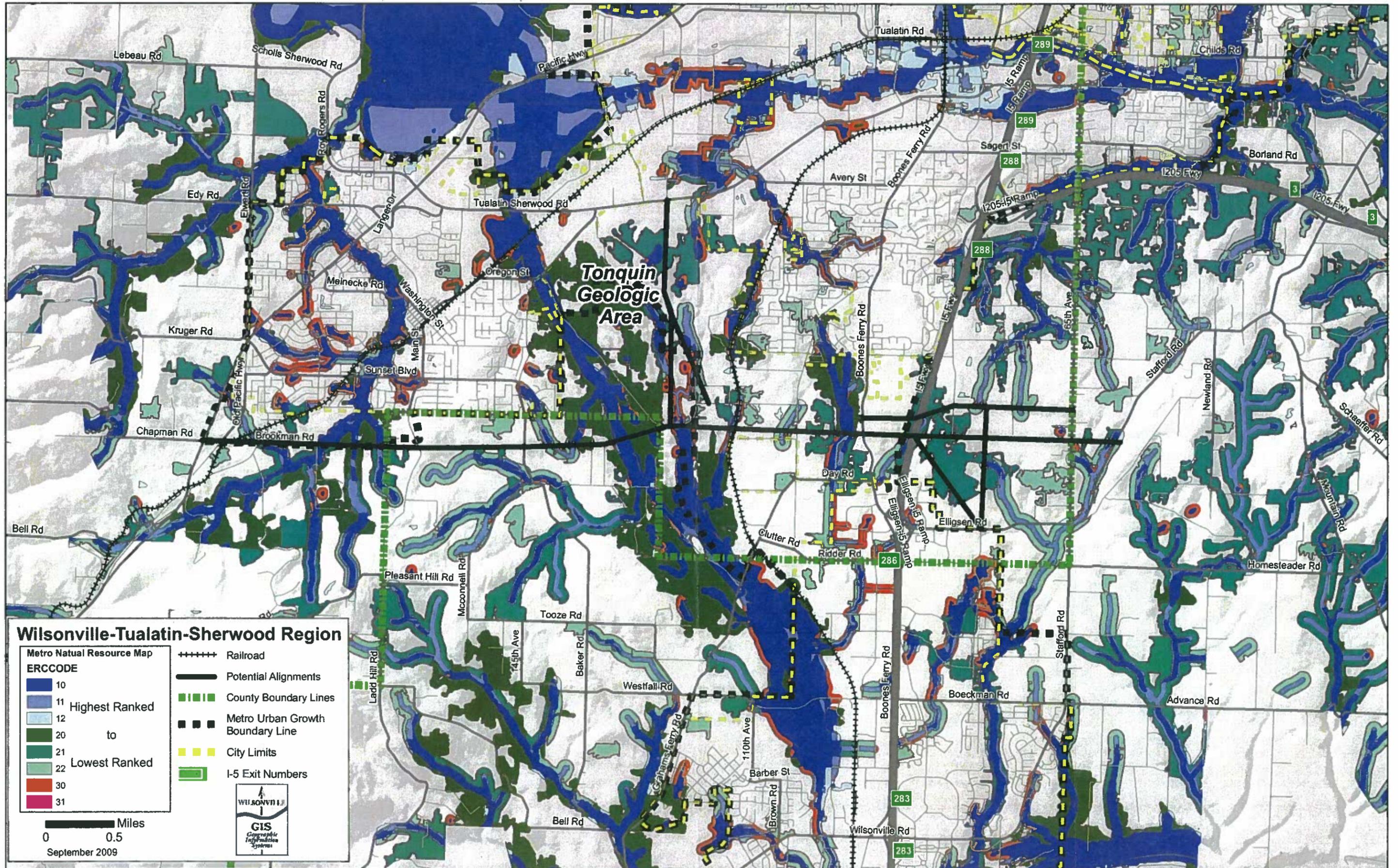
Attachment

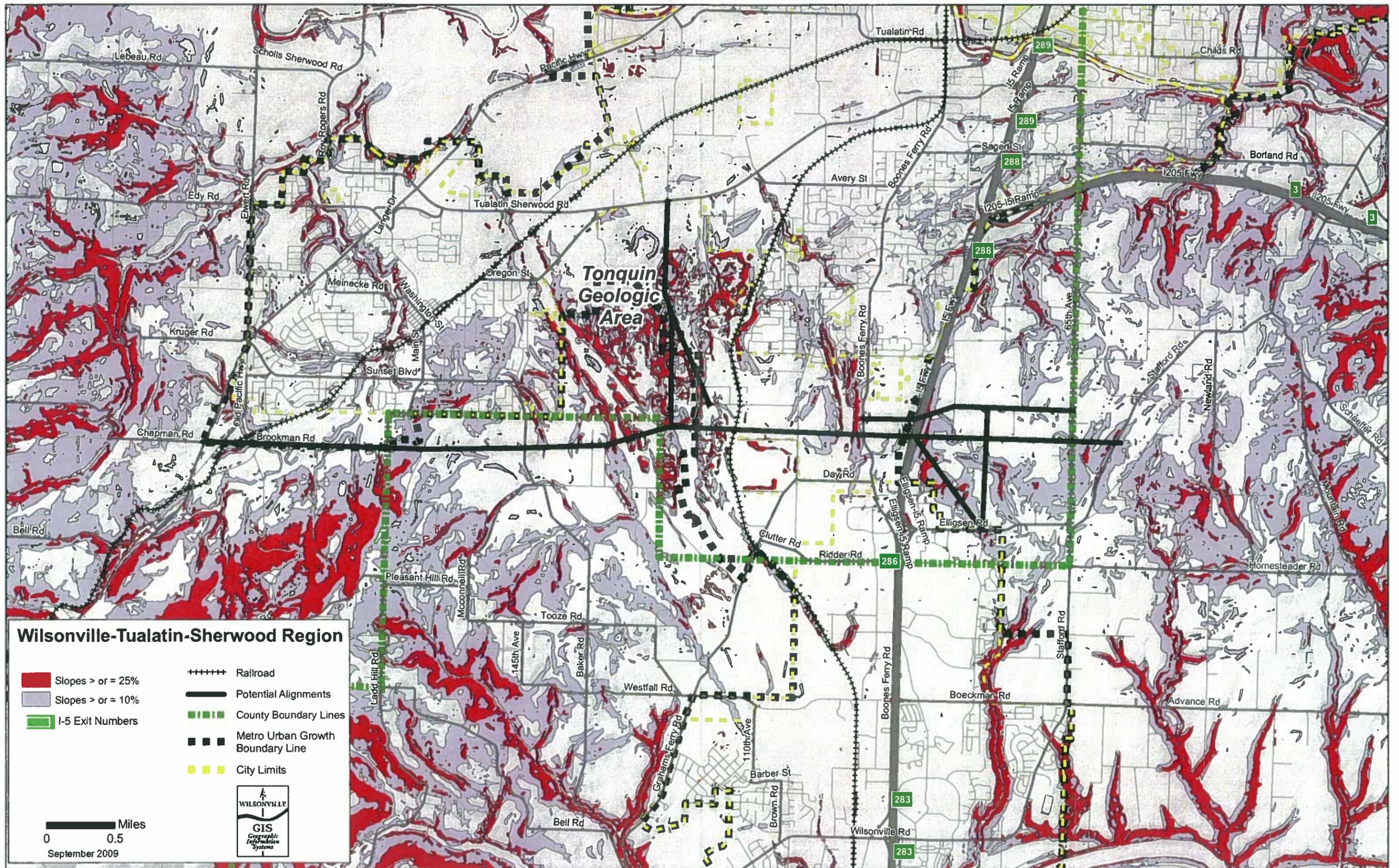
The City of Wilsonville Proposed Urban and Rural Reserve Areas

Note: All information is subject to change. Every effort is taken to eliminate errors and omissions but please contact the City of Wilsonville to confirm information before taking any action.

-  2002 UGB Expansion
-  2004 UGB Expansion
-  Proposed Urban Reserve Area
-  Proposed Rural Reserve Area
-  Current UGB
-  City Limits
-  UGB + One Mile
-  County Boundary







RESOLUTION NO. 2225**A RESOLUTION OF THE CITY OF WILSONVILLE APPROVING TESTIMONY TO BE PRESENTED IN THE METRO URBAN AND RURAL RESERVES PUBLIC HEARING.**

WHEREAS, prior to adoption of SB 1011 by the State Legislature, the City Council and Planning Commission desired a pro-active approach to the designation of future urban land and embarked on an extensive public process to analyze areas surrounding the city; and

WHEREAS, following numerous public meetings where landscape features, natural resources, zoning, soils, tax lots, agricultural viability, productivity, slopes, floodplains, parks, transportation systems, and required infrastructure costs necessary to serve various geographic areas were analyzed, a series of recommendations emerged that became the “aspirations” of the community; and

WHEREAS, the City’s recommendations were based on forecasted need, and focused primarily on areas for housing to help balance the local jobs to housing ratio imbalance; and

WHEREAS, the recommendations thoughtfully applied the urban and rural reserve administrative rule ‘factors’ as well as Metro’s Making the Greatest Place criteria; and

WHEREAS, the City’s recommendations carefully weighed our ability to provide urban services of all kinds, including transportation, and build upon areas added to the UGB in 2002 in an attempt to continue to make the greatest places; and

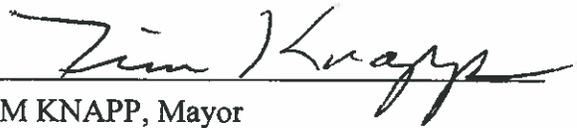
WHEREAS, the City Council has thoughtfully recommended a conservative amount of future urban land, balancing the desire for a vibrant city center and existing infrastructure with the need for new areas for growth and expansion; and

WHEREAS, the City Council strongly supports the designation of the foundation farm lands in French Prairie south of the City and the entirety of the Tonquin Geologic Area identified by Metro as an important natural landscape feature as rural reserves.

NOW, THEREFORE, THE CITY OF WILSONVILLE RESOLVES AS FOLLOWS:

1. The City Council supports the attached maps and testimony as being appropriate for the community and as satisfying the required factors for establishment of urban and rural reserve designation; and
2. City staff is instructed to convey the attached written testimony to Metro in support of the City Council's Resolution.

ADOPTED by the Wilsonville City Council at a special meeting thereof this 20th day of January, 2010, and filed with the Wilsonville City Recorder this date.


TIM KNAPP, Mayor

ATTEST:


Sandra C. King, City Recorder, MMC

SUMMARY OF VOTES:

| | |
|------------------|---------|
| Mayor Knapp | Yes |
| Councilor Kirk | Yes |
| Councilor Hurst | Excused |
| Councilor Ripple | Excused |
| Councilor Nunez | Yes |

Urban and Rural Reserve Testimony
City of Wilsonville
January 21, 2010

French Prairie

First – thank you all for your unanimous support of designating the French Prairie area as a Rural Reserve. Generations ahead will be grateful for that decision. French Prairie sits at the doorstep of the Metro Region. There is no question that the French Prairie area is threatened by urbanization and it is well documented that this area has some of the most critical foundation farmland in the Willamette Valley. As noted in Oregon Administrative Rule 660-027-0060(4): “... a county may deem that Foundation Agricultural Lands or Important Agricultural Lands within three miles of a UGB qualify for designation as Rural Reserves ... without further explanation...” The Metro Council, the Core-4, and the Clackamas County Board of Commissioners have all agreed that French Prairie is exactly the kind of area for which the Rural Reserve process was created.

Wilsonville’s Growth Aspirations and Capabilities

The City of Wilsonville has taken the required ‘Factors’ of the Administrative Rules seriously. We have worked through a deliberative process to determine which areas best qualify as Urban Reserves and which qualify as Rural. We have conducted a detailed public process to establish our local aspirations for growth over 20 and 50-year horizons. We have not attempted any sort of “land grab.” We have focused on the legal requirements and we have carefully weighed our ability to provide urban services of all kinds, including transportation services.

Proposed Urban Reserves Adjoining Wilsonville

As noted above, the City of Wilsonville has based its Urban Reserve aspirations on the community’s projected growth needs and on our ability to provide needed urban services. While we question the future growth potential of much of the Stafford area, we support the use of Metro’s maps showing projected growth areas at the following specific locations adjoining the City on the community’s east, west and north sides:

4-D Options -- is a large area spreading from Wilsonville to Highway 205 along Stafford Road. As the City has stated publically before, the City of Wilsonville has neither the inclination nor the ability to provide urban services to Area 4-D. This is outside the area that the City has included within its aspirations for long-term growth and due to topographic issues and other considerations would be cost-prohibitive for Wilsonville to serve.

4-F Options – should be labeled “4-F Urban.” The City of Wilsonville has expressed a willingness and capacity to serve this area, but will be best positioned to provide service to 4-F if Area 4-G is also included (thus allowing the City to provide sewer service through 4-G to 4-F). Note that this is simply a matter of topography and drainage patterns through the area. Please see explanation regarding 4-G, below.

4-G Urban – should be included as an Urban Reserve because it is needed to meet community growth projections and efficiently provide sewer service. Area 4-G is directly north of the Frog Pond area which was added to the UGB in 2002 and which has still not been developed, largely because of the lack of sanitary sewer service. The City is moving forward with plans to design the sewer collection infrastructure to serve the Frog Pond area. By including Area 4-G within the long-range service plans for the Frog Pond area it will reduce public costs over time. Note that it will be much less expensive to simply oversize gravity sewer pipes to serve Frog Pond (thinking ahead to eventual service of Area 4-G, and on to 4-F) than to have to go back later and either replace those pipes with larger ones or run additional pipes parallel to the existing ones. Planning now to provide eventual urban services to 4-G is a simple matter of efficiency in spending scarce public infrastructure dollars. The City strongly supports the inclusion of Area 4-G as an Urban Reserve.

4-H Urban – should be included as an Urban Reserve. A significant portion of this land has already been acquired by the public for future park and school development (anticipating the eventual construction of both an elementary and a middle school) which will serve the Frog Pond area when it is built out to urban densities. The City is committed to provide urban services to Area 4-H and strongly supports its inclusion within the Urban Reserves.

5-G and 5-H -- should be included as Urban Reserves. Both of these areas have been included within the City's aspiration areas for future growth. The City is committed to provide urban services to these areas.

The Tonquin Geologic Area and Coffee Lake

As Metro looks ahead at designating land for both rural and urban land needs over the long term, we ask that you consider some of Metro's own fine past work that has helped to make this the greatest place. We ask this because we are concerned about the potential impacts of today's decisions on some of the Region's most significant natural resources. One such critical and unique natural resource area is the Tonquin Geologic Corridor.

In an effort to minimize confusion, our comments will refer to Areas as mapped and described by Metro. We have also attached other maps that we feel are relevant. Please note the following comments relative to Areas 5-E, 5-F and 5-G. Let's start with some local geography. It is important to remember that there is a continuous natural resource corridor that connects the Tualatin River Wildlife Refuge to the Tonquin Geologic area, to both Rock Creek and Coffee Creek to Coffee Lake.

The City supports the proposed Rural Reserve designation as mapped in Area 5-E, and also argues that the rural designation should be continued to the north into Washington County. Quoting Metro's report, in describing Area 5-A, "*...part of the Tualatin National Wildlife Refuge, an important natural landscape feature that defines the extent of urbanization from the cities of Sherwood and Tualatin.*" We respectfully submit that, if that description applies in Area 5-A (and we believe it does), it applies just as well to Area 5-F, where much of the land (see attached map) is part of the Tualatin River National Wildlife Refuge.

Also attached is a copy of Metro's 2007 map labeled "Natural Landscape Features Inventory." The significance of that inventory was not lost on the State in establishing the Factors for designating Rural Reserves in OAR 660-027-0060(3):

"When identifying and selecting lands for designation as Rural Reserves intended to protect important natural landscape features, a county must consider those areas identified in Metro's 2007 Natural Landscape Features Inventory." Please note that the Tonquin Geologic Corridor is prominently displayed on that map. Ironically, the National Wildlife Refuge is not even mentioned in Metro's description of Area 5-F, which is instead described as *"suitable for potential future industrial development and freight movement..."* It seems that Metro has chosen to disregard one of the region's most important natural resource areas in the interest of justifying the proposed I-5 – 99W Connector. Metro has produced a document that, in one paragraph extols the importance of the natural resources and landscape features of the Wildlife Refuge and the Tonquin area, and then follows it in the next paragraph with the statement that the area is suitable for urbanization – ignoring the fact that a contiguous swath of that land has already been acquired by the federal government and included within the Wildlife Refuge.

Metro's past history in protecting natural resources has been evidenced in two bond measures for open space acquisitions (including acquisitions within the Tonquin Corridor by Metro and support for federal acquisitions as part of the Tualatin River National Wildlife Refuge), Titles 3 and 13 of the Urban Growth Management Functional Plan, and Metro's Nature in Neighborhoods program, based in Chapter 3 of the Regional Framework Plan. Metro has the opportunity to extend that history of resource protection to a significant portion of the Wildlife Refuge and Tonquin Geologic Corridor by designating it a Rural Reserve.

Arguments supporting the Rural Reserve designation of the eastern portion of Area 5-E (south and east of Sherwood, north of Morgan Road).

- This area is within the Tonquin Geologic Corridor (area 10 on Metro's Natural Landscape Features Map -- attached);
- The Rock Creek drainage in this area was ranked by Metro to be among the region's highest priority natural resource areas. It includes a wide riparian corridor and adjoins the Tualatin River National Wildlife Refuge;
- The area floods, with the lowest trough about 500 feet across – the riparian corridor probably exceeds 1,000 feet in width;
- The area adjoins land to the south that is slated for Rural Reserve designation on both the Bragdon/Hosticka and Liberty/Park maps. This is a logical extension of an area that is obviously going to be a Rural Reserve. It does not create an isolated island of either Urban or Rural Reserves; and
- It is proposed as a Rural Reserve area on the map proposed by the Agricultural and Natural Resources Coalition (January 11, 2010).

Of the eight Factors that Metro is required to consider in designating Urban Reserves, five are problematic in terms of urbanizing the eastern portion of Area 5-E. Those are Factors 1, 3, 5, 7, and 8.

Factor 1. *Can (the area) be developed at urban densities in a way that makes efficient use of existing and future public and private infrastructure investments?*

The City of Wilsonville respectfully submits that there is no way that the Metro Council can properly and realistically conclude that designating this particular area as Urban Reserve supports “future urban densities in a way that makes efficient use of existing and future public and private infrastructure investments?” We can think of no efficient way to provide a full range of urban infrastructure across a riparian zone that is as much as 800 to 1,000 feet wide and there is no evidence that the area can be “developed at urban densities.”

Factor 3. *Can (the area) be efficiently and cost-effectively served with public schools and other urban-level facilities and services by appropriate and financially capable service providers?*

Given the topography and natural features of the area, it is difficult to imagine how the Metro Council could conclude that the area “can be efficiently and cost-effectively served by appropriate and financially capable service providers?” As recognized in this factor, financial capability is a significant issue for those of us in the business of providing urban services. Including land with significant natural features and enormous topographic limitations within the Urban Reserves does not give ample consideration to Factor 3.

Factor 5. *Can (the area) be designed to preserve and enhance natural ecological systems?*

This Factor is a major concern. Metro’s own documents, and even the language of the Oregon Administrative Rule, mention the significance of the Tonquin Geologic Area in terms of natural resources. The City of Wilsonville joins the members of the Agricultural – Natural Resources Coalition in arguing that this area should be designated as a Rural Reserve and questions how the Metro Council could appropriately conclude that this area “can be designed to preserve and enhance natural ecological systems” if it is included within an Urban Reserve.

Factor 7. *Can (the area) be developed in a way that preserves important natural landscape features included in urban reserves?*

As with Factor 5, above, the City submits that the Metro Council cannot realistically conclude that this area can be designated an Urban Reserve and that it “can be developed in a way that preserves important natural landscape features included in Urban Reserves.”

Factor 8. *Can (the area) be designed to avoid or minimize adverse effects on farms and forest practices, and adverse effects on important natural landscape features, on nearby land including land designated as rural reserves?*

The City of Wilsonville respectfully submits that this area cannot be urbanized and still “be designed to avoid or minimize adverse effects on important natural landscape features.”

The City of Wilsonville maintains that the eastern portion of the proposed Urban Reserve south of Sherwood (Area 5-E) does not qualify for Urban Reserve status. This area does qualify as a Rural Reserve, simply because placing it in that designation would “protect important natural resource features.”

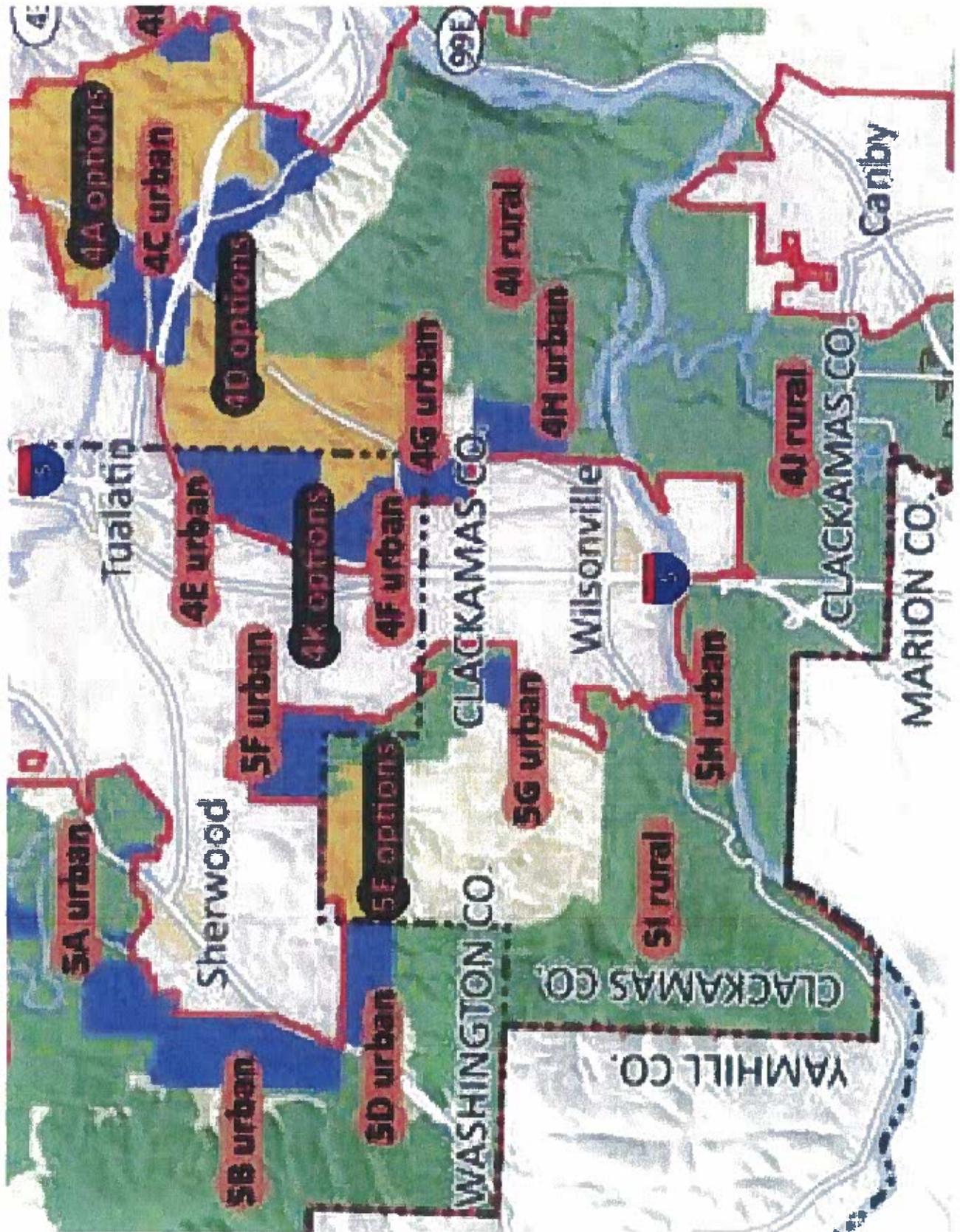
Proposed I-5 – 99W Connector

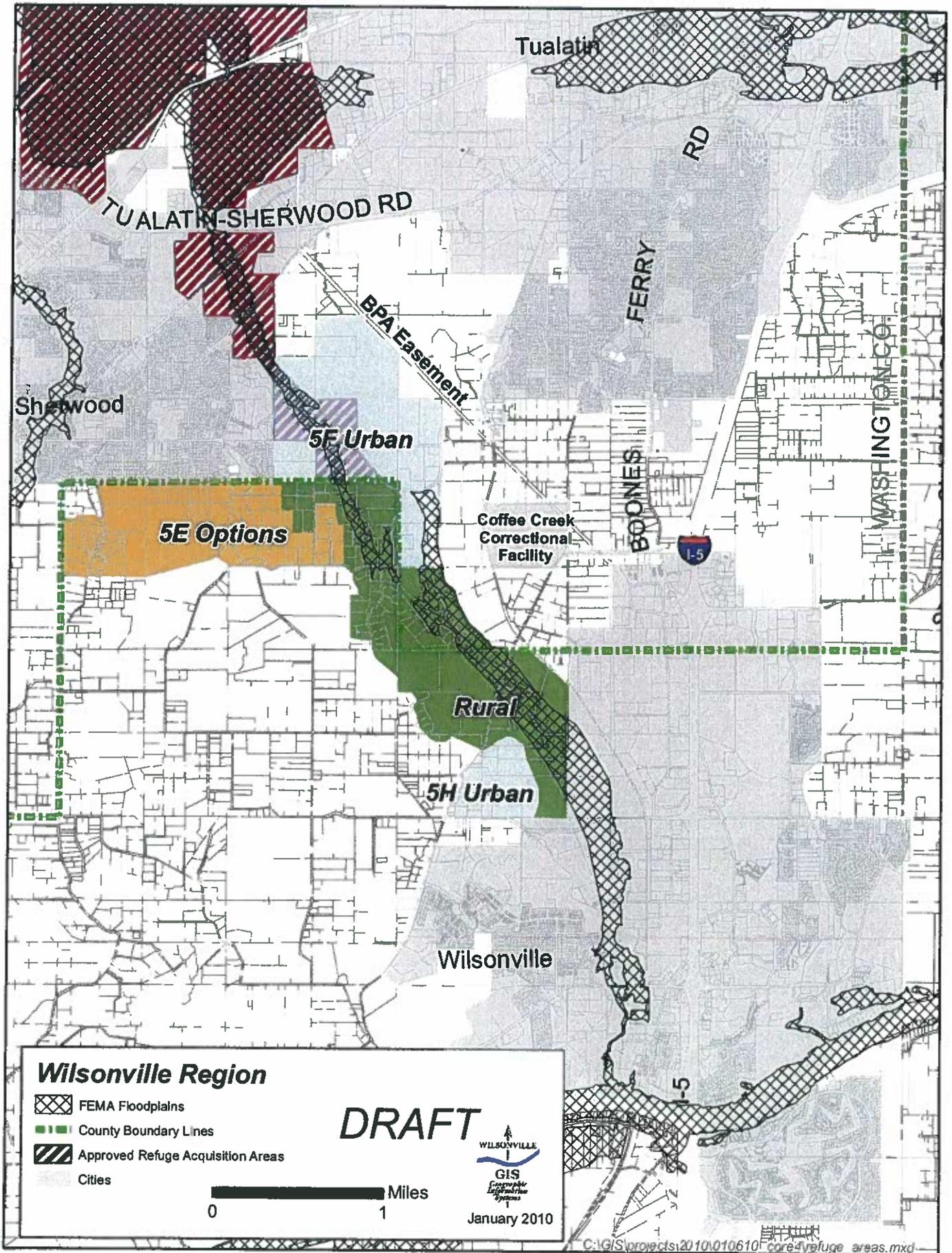
There is another disturbing pattern to the arguments posited by Metro in support of urbanizing Areas 5-E and 5-F. Those arguments are based on the circular logic that the areas are needed for urban development in order to build the Connector, and the Connector is needed in order to justify the urbanization of the areas. That sort of reasoning damages the credibility of the entire process and has caused some to ask whether the Urban Reserve process is being used to resurrect the West Side Bypass of bygone days.

Thank you for your consideration of our comments.

Attachments:

- Metro Proposed Urban and Rural Reserves map (1/11/10);
- Metro Reserves map – Wilsonville focus (1/11/10);
- Map – Tualatin River National Wildlife Refuge acquisition area,
- FEMA 100-year flood plain, Tonquin Geologic Area, and proposed reserves;
- Map – Metro’s 2007 Natural Landscape Features Inventory;
- Landscape Features Inventory Map – Wilsonville focus;
- Map – City of Wilsonville Proposed Reserves (January 2010);
- Aerial photo with proposed reserves – areas 5-E and 5-F; and
- Map – Agricultural and Natural Resources Coalition, Proposed Reserve Areas (1/11/10).



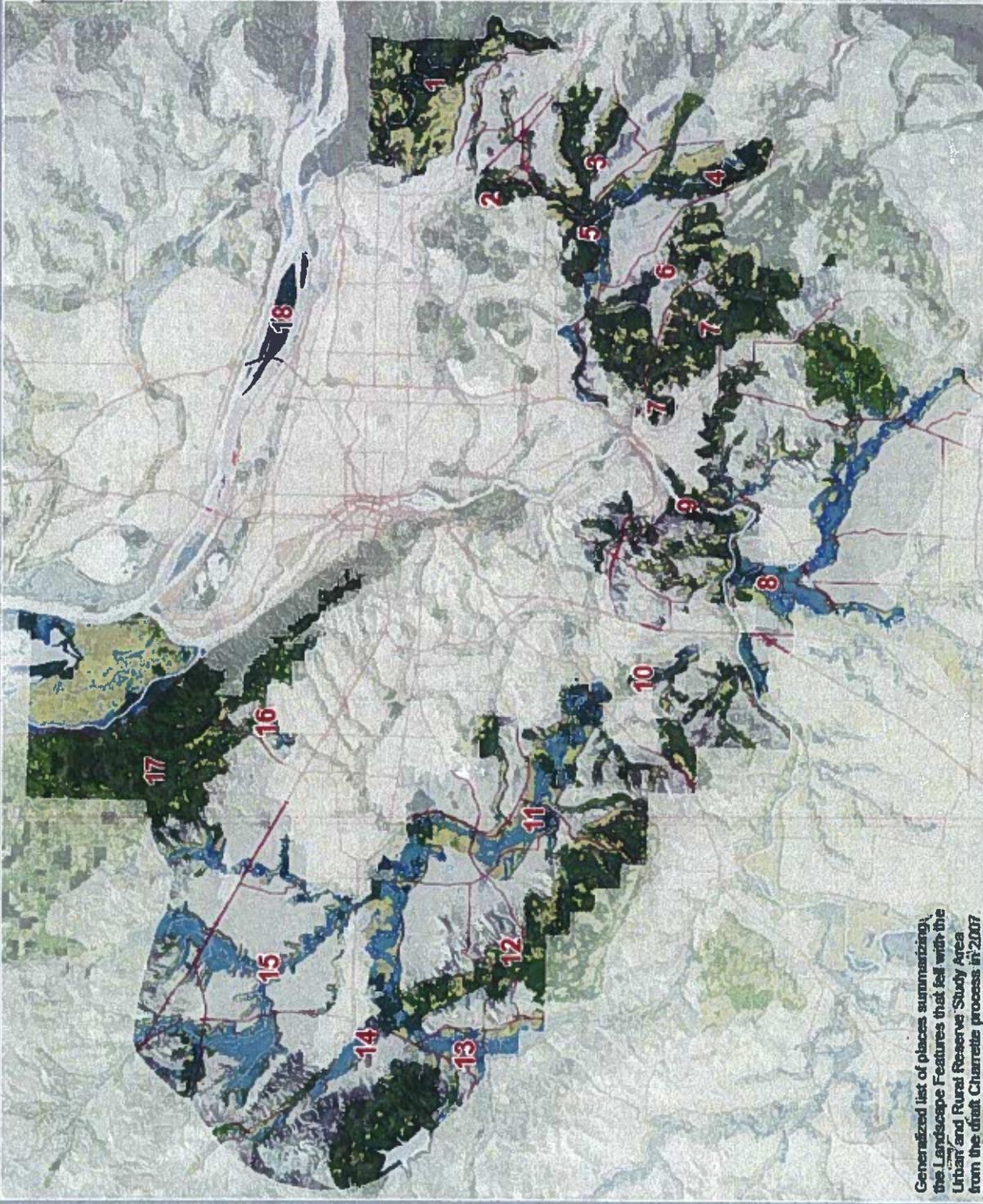


New Look

Natural Landscape Features Inventory
February 2007

In a process to identify key natural features on a broad landscape scale, we brought participants familiar with the area, to view a number of available datasets and clarify what areas define the significant regional features. Then a charrette was composed of this extended region, extending from the Coast Range to the Cascades and from Salem to the North Fork of the Lewis River.

In this map we brought in the graphic and aligned it with the Urban and Rural Reserve's Study Area. In Project06 and We have attempted to break down these general descriptions with the GIS data. This is to help Counties overlay the Natural Features with the regionally important Agricultural and Forest layers.



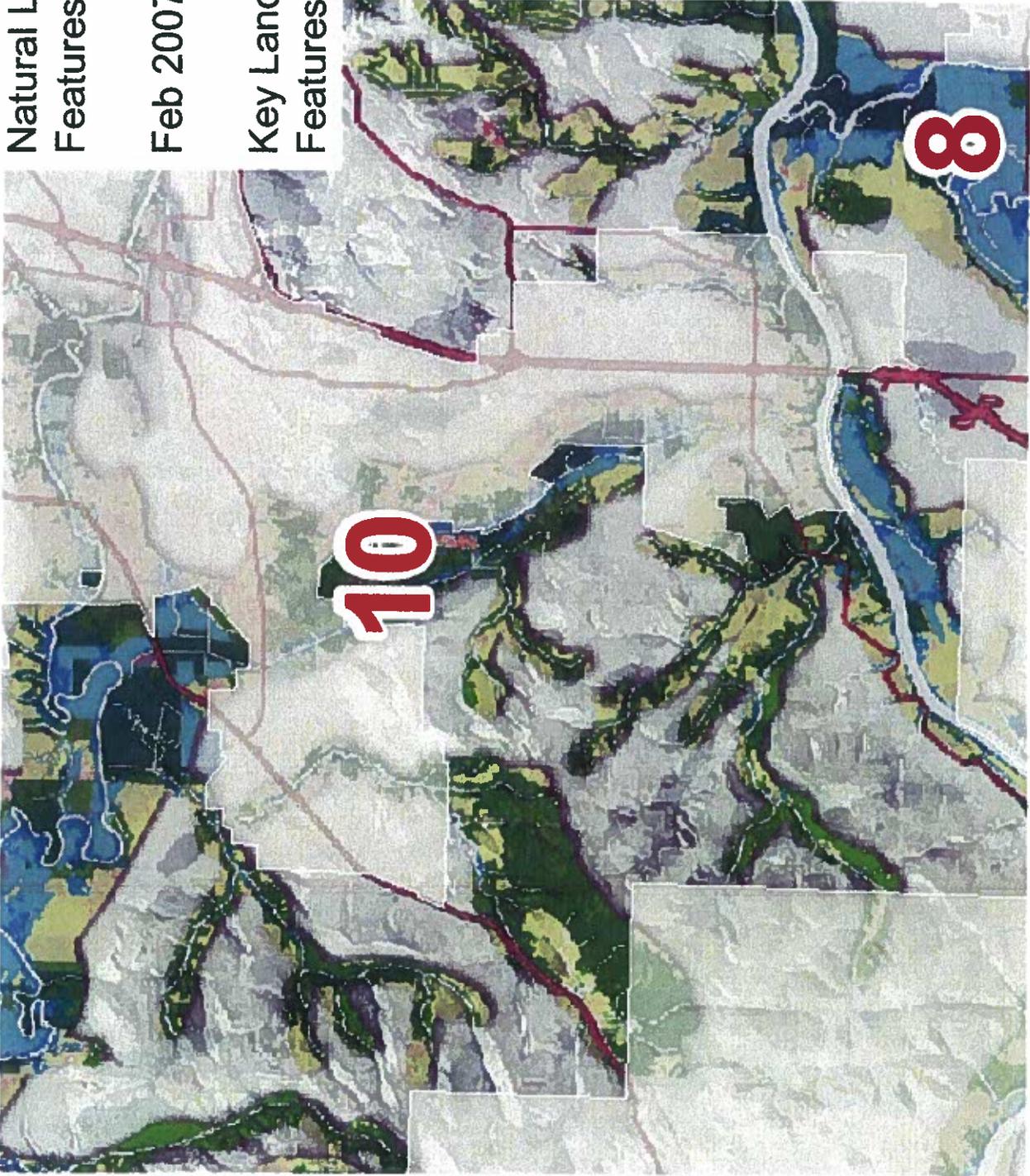
Generalized list of places summarizing the Landscape Features that fell with the Urban and Rural Reserve Study Area from the draft Charrette process in 2007

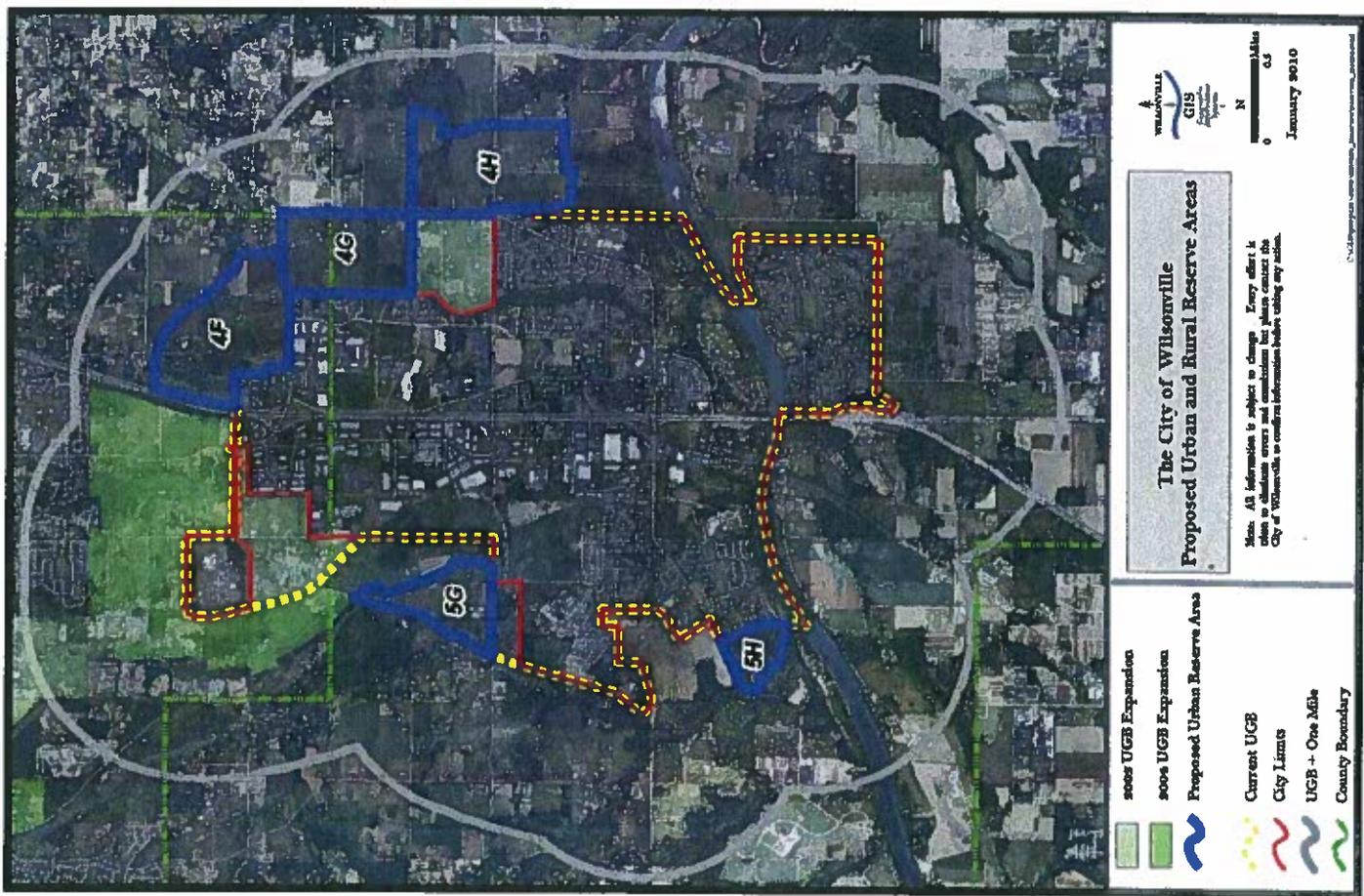
- | | | |
|---|--|-----------------------------|
| # | 1) Sandy River | 15) Dairy & McKay Creeks |
| | 2) East Buttes | 16) Rock Creek Headwaters |
| | 3) Deep Creek Canyon | 17) Forest Park Connections |
| | 4) Clackamas River | 18) Columbia River Island |
| | 5) Clackamas River Bluffs & Greenway | |
| | 6) Clear Creek Canyon | |
| | 7) Newell Creek | |
| | 7) Abernathy Creek | |
| | 8) Lower Pudding River | |
| | 9) Willamette Narrows to Canemah Bluff | |
| | 10) Tonquin Geologic Area | |
| | 11) Tualatin River | |
| | 12) Chehalam Mountain | |
| | 13) Wapato Lake | |
| | 14) Lower Gales Creek | |

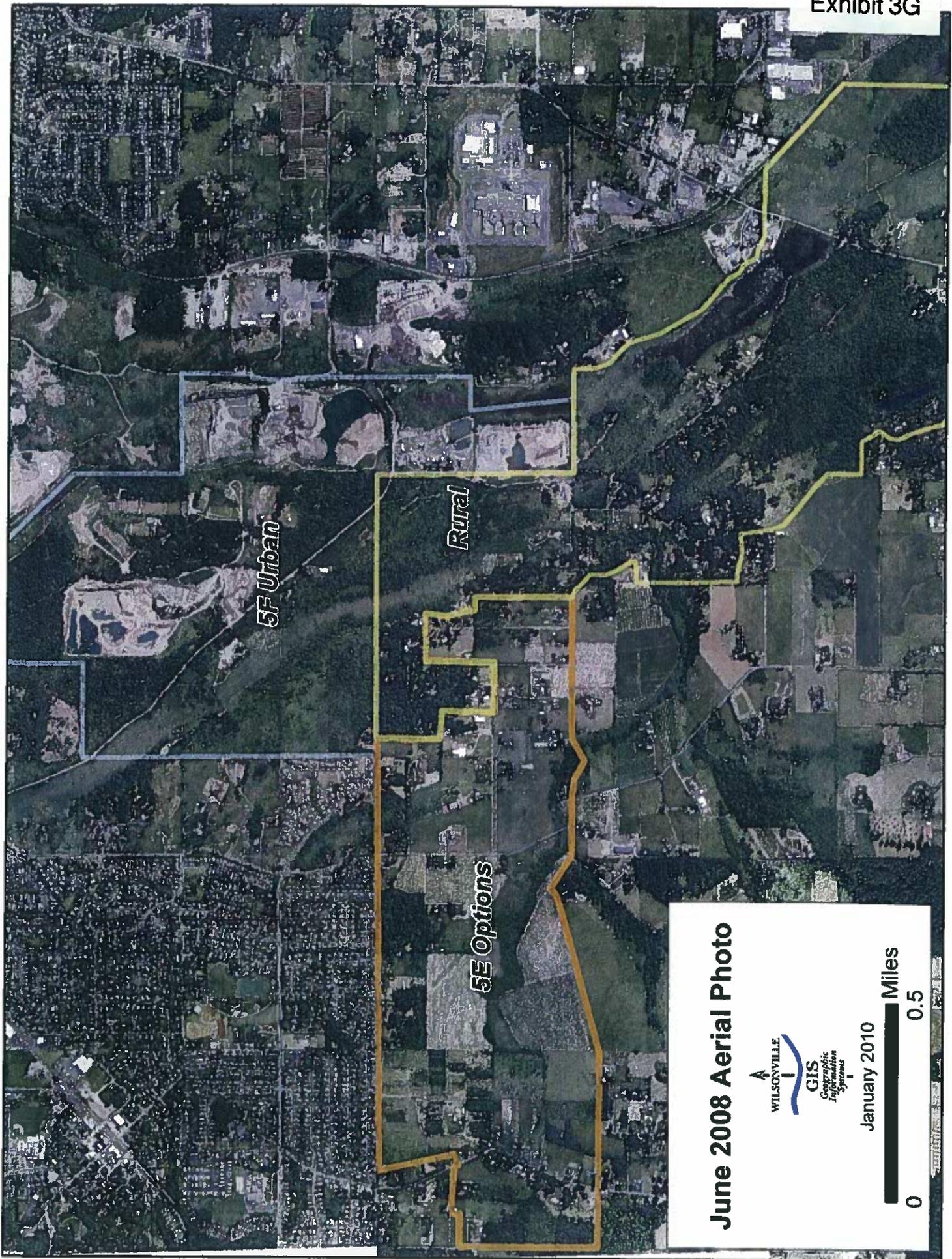
Natural Landscape
Features Inventory

Feb 2007

Key Landscape
Features







5F Urban

Rural

5E Options

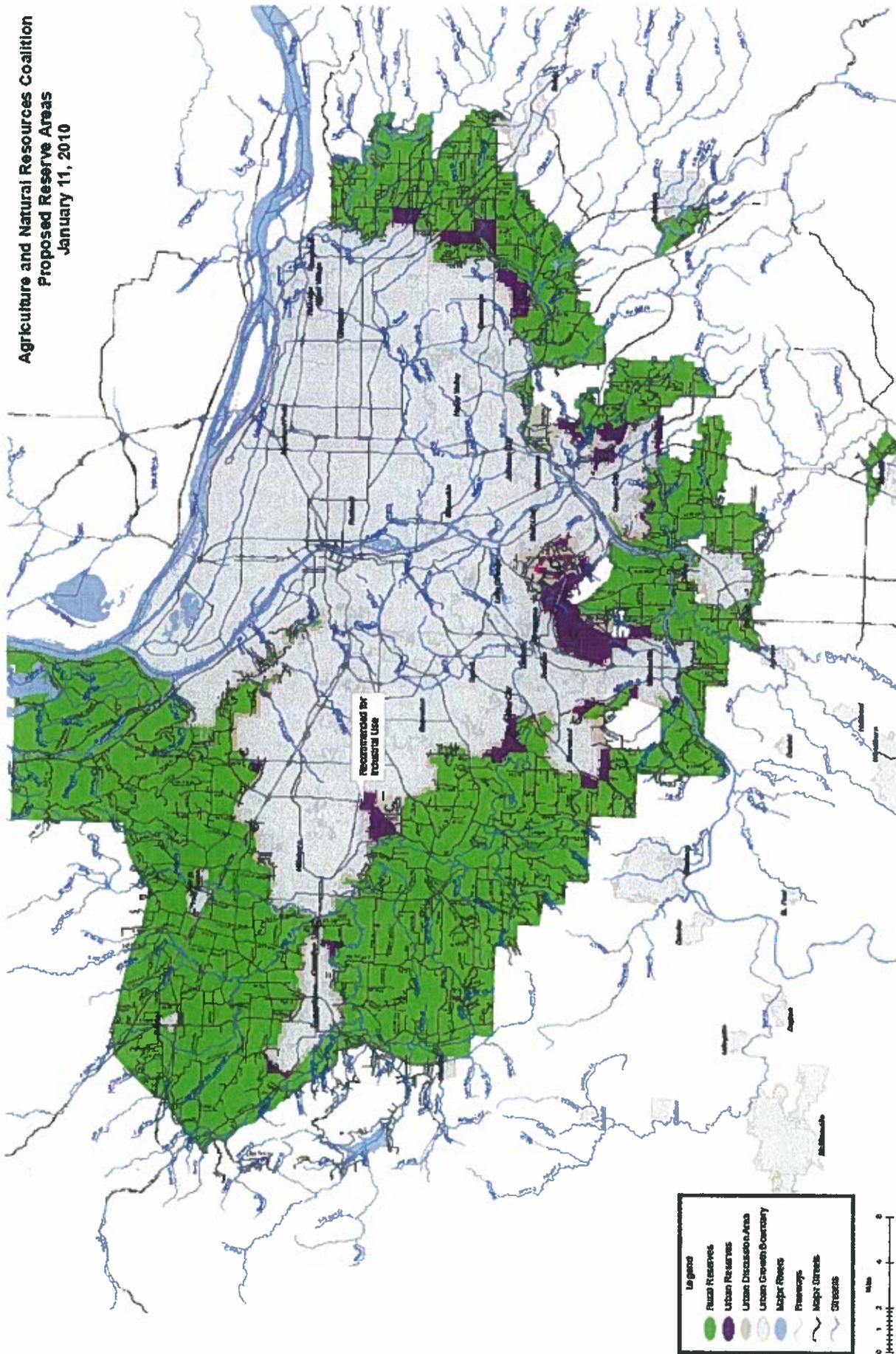
June 2008 Aerial Photo

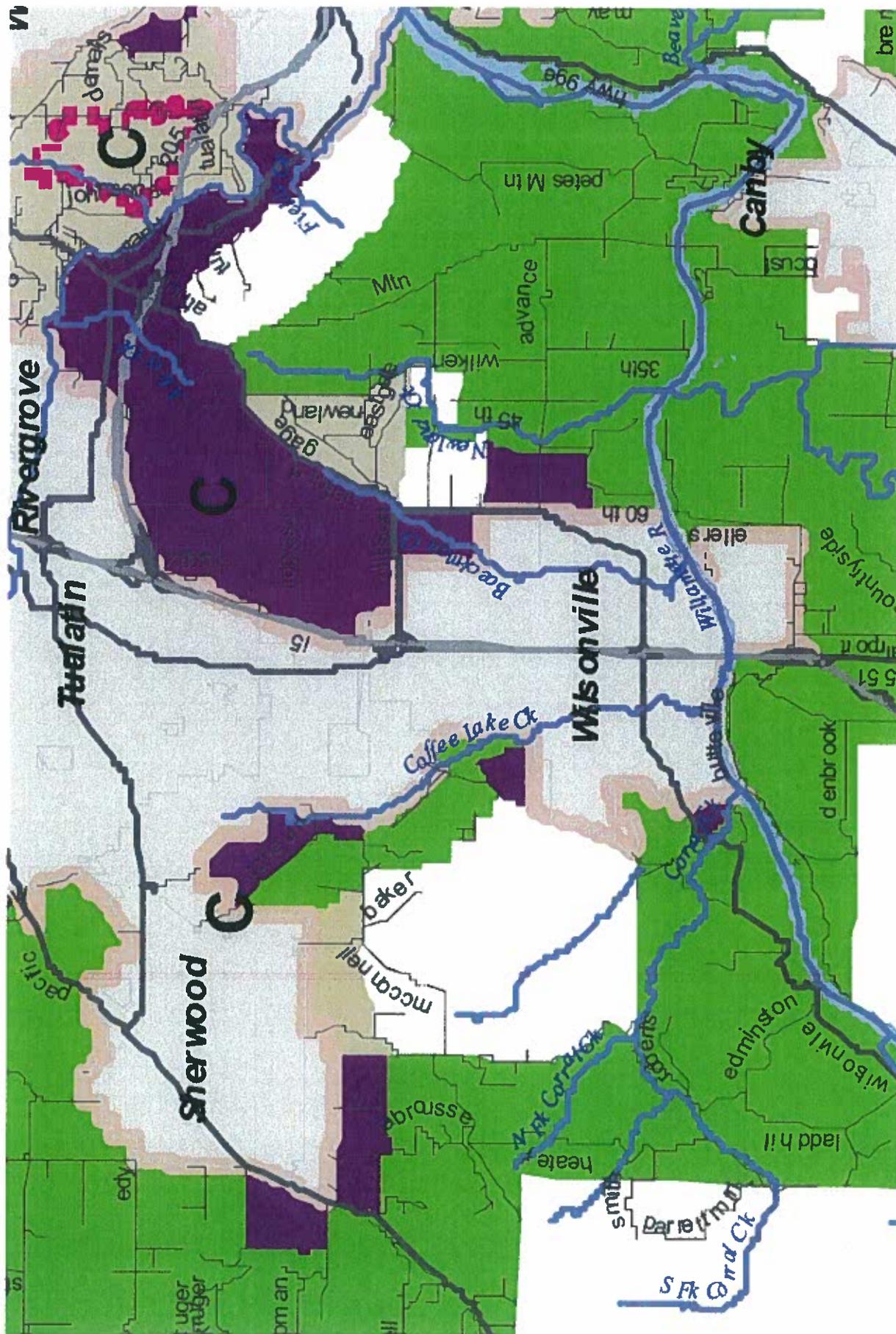


January 2010



Agriculture and Natural Resources Coalition
Proposed Reserve Areas
January 11, 2010





February 17, 2010



29799 SW Town Center Loop E
Wilsonville, Oregon 97070
(503) 682-1011
(503) 682-1015 Fax Administration
(503) 682-7025 Fax Community Development

Honorable David Bragdon, Council President
Honorable Rod Park, Councilor, District 1
Honorable Carlotta Collette, Councilor, District 2
Honorable Carl Hosticka, Councilor, District 3
Honorable Kathryn Harrington, Councilor, District 4
Honorable Rex Burkholder, Councilor, District 5
Honorable Robert Liberty, Councilor, District 6
Metro Council
600 NE Grand Ave.
Portland 97232-2736

RE: Wilsonville-Area Lands of Concern Mapped by the "Core 4 Urban and Rural Reserves Proposal" to Metro Council, Dated February 8, 2010

Dear Council President Bragdon and Councilors Park, Collette, Hosticka, Harrington, Burkholder and Liberty:

The Wilsonville City Council wishes to thank you and members of the "Core 4" Urban/Rural Reserves Steering Committee for your time, dedication and commitment to the urban and rural reserves process mandated by Senate Bill 1011.

Following up on our testimony before the Metro Council on January 21, 2010, we would like to comment on a few issues of agreement and concern pertaining to the areas near Wilsonville that appear in the most recent map, dated February 8, 2010, and entitled the "Core 4 Urban & Rural Reserves Proposal" to the Metro Council.

Areas of Agreement

We appreciate the consideration of the Core 4 that Areas 4G, 4H, 5G and 5H were designated as urban reserves. The city's urban reserve aspirations are modest as we pursue a compact urban form with increasing density that we have the capacity to serve. These particular areas, along with the city's existing urban reserves brought into the urban growth boundary in 2002 and 2004, are locales that the city is willing and able to provide governance and urban services infrastructure.

We appreciate that Area 4J, French Prairie, is recommended as rural reserve since this area of foundation farmland qualifies very well under factors of SB1011 as a rural reserve.

Areas of Concern

There are a number of areas in the greater Wilsonville vicinity that are proposed as reserves for which we have some concerns.

Proposed urban reserve Areas 4D and 4F, collectively "South Stafford region," are of particular concern since no city in the immediate area—namely Tualatin and Wilsonville—has indicated an interest, willingness or ability to provide governance and urban services to these areas. As we noted in our January 21 testimony, these areas are "outside of the area that the City has included within its aspirations for long-term growth and due to topographic issues and other considerations would be cost-prohibitive for Wilsonville to serve."



We are pleased that the Core 4 map appears to show the southern portion of the Tonquin Geologic Area and Coffee Creek/Lake wetlands as a rural reserve that is not labeled with an area name or letter, but is shown as a green shade on the map. As the Metro Council recognized in 2007, the Tonquin Geologic Area is one of the greater Portland region's most significant "natural landscape features," as catalogued in the Metro Natural Landscape Features Inventory.

We are somewhat puzzled by the proposed designations to some of the lands west of Wilsonville. In particular, the northern portion of the Tonquin Geologic Area, Area 5F, is proposed as an urban reserve, when in reality only a fraction of this land is developable due to the extensive presence of wetlands, creeks, shallow water table, unstable soils and portions of land authorized for acquisition by Congress for the Tualatin National Wildlife Refuge. A substantial amount of Area 5F is well qualified under the natural resource factors of SB1011 to be designated as a rural reserve.

Area 5E Options can be considered as two distinct regions: the Tonquin Geologic Area in the eastern portion and the northern reach of Ladd Hill in the western half. Consistent with our testimony and recommendation on Areas 5F and 5E, the entire 17-square-mile Tonquin Geologic Area should be designated a rural reserve. The remainder area of 5E, the north side of Ladd Hill, appears to meet neither set of factors well for urban or rural reserve designation under SB1011, and therefore should be considered as undesignated, similar to the recommended status for the remainder of the Ladd Hill area.

In reviewing the "Public comment report, Core 4 Review draft 2 (2/8/10)," we note that Area 5E received a very large amount of public comment favoring rural reserve designation for the Tonquin Geologic Area.

We also have some concern regarding Metro Council's thought of designating important natural resource features like the Tonquin Geologic Area as urban reserves and then protecting these areas under existing laws and rules or through "principles" attached to intergovernmental agreements. As the Metro Policy Advisory Committee (MPAC) discussed on January 27, 2010, designating natural resources in urban reserves can be highly problematic; MPAC members cited the example of land-use conflicts over the Buttes area of Damascus by landowners who believe that they have the right to develop lands brought into the urban growth boundary that are significant natural resources. Our understanding of SB1011 is that significant natural resources were to be protected as rural reserves and not as urban reserves to be protected by other laws and rules.

We thank you for your time and consideration to hear our issues of agreement and concern regarding the proposed reserve areas near Wilsonville.

Sincerely,


Tim Knapp, Mayor

cc: Honorable Charlotte Lehan, Commissioner, Clackamas County representative to Core 4
Honorable Jeff Cogan, Commissioner, Multnomah County representative to Core 4
Honorable Tom Brian, Commission Chair, Washington County representative to Core 4



May 18, 2010

Metro Councilor President Bragdon and
Metro Councilors
Metro Regional Center
600 NE Grand Ave.
Portland, OR 97232

RE: Adoption of reserves

Dear President Bragdon and members of the Council:

I am writing on behalf of the City of Wilsonville. As you know, we have been actively involved in the reserves process since its inception and we remain both interested and concerned.

First, we want to thank you again for working cooperatively with Clackamas County in designating the French Prairie area south of the Willamette River as a rural reserve. As with other foundation farmland in the region that can remain productive, we all share a responsibility to do what we can to protect it from conflicting uses. We thank you for recognizing the long-term importance of the French Prairie farmlands.

The City of Wilsonville remains generally satisfied with both the urban and rural reserve designations around Wilsonville. We remain, however, concerned about the long-term future of the large swath of urban reserve land between Wilsonville and Lake Oswego, Tualatin and West Linn. At this point, it is difficult to imagine that any of the four surrounding cities will be able or willing to provide urban services to more than a small portion of the total area. Wilsonville, having studied both the potential build-out and the costs of providing services, is neither willing nor able to provide urban services beyond the tier of properties adjacent to the City limits.

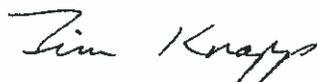
Our concern is that the urban reserve designation may create unrealistic expectations for numerous property owners that are unlikely to receive urban services from any city over the next 50 years.

Finally, we now find that, even before the designation process is complete, we must shift our attention from the process of designating the reserves to the rule-making process for reserves now taking place at the state level. We would encourage your Council to join those calling for strict rules on the activities and land uses that will be allowed to occur, especially in rural

reserves. To do otherwise could diminish all of the work that has gone into the reserves process over the last three years.

Thank you for your consideration of our comments and for all of your long hours of work on reserves.

Sincerely,

A handwritten signature in black ink that reads "Tim Knapp". The signature is written in a cursive style with a large, stylized "T" and "K".

Tim Knapp, Mayor

Copies: Chair Peterson and Clackamas County Board
Tualatin Mayor Ogden
Lake Oswego Mayor Hoffman
West Linn Mayor Kovash
Wilsonville City Council

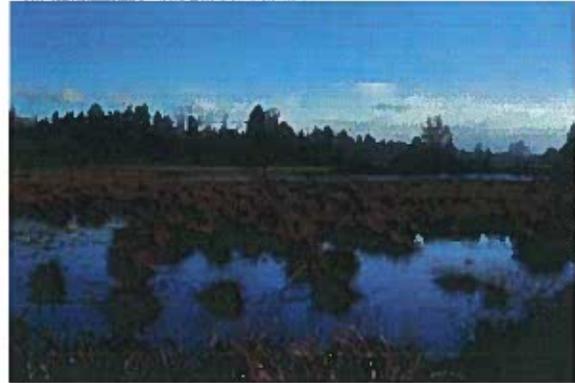
Metro's Tonquin Geologic Area goals and objectives

<http://www.oregonmetro.gov/index.cfm/go/by.web/id=28333>

JANUARY 2010

PLANNING AND CONSERVATION › NATURAL AREAS, PARKS AND TRAILS › ACQUIRING NATURAL AREAS › TONQUIN GEOLOGIC AREA › GOALS AND OBJECTIVES

Learn about the goals and objectives for habitat and water quality protection in the Tonquin Geologic Area target area. View maps illustrating the Metro Council's priorities in this area and learn more about the importance of the area to our region.



The Metro Council's goal and objectives for the Tonquin Geologic Area target area are:

Goal

Protect unique geologic features that provide valuable wildlife habitat. Acquire additional lands needed for a future regional trail corridor connecting Wilsonville to Tualatin.

Objectives

Tier I Objectives

- Acquire lands within the Coffee Lake Creek and Rock Creek for completing restoration on Coffee Creek and on permanent protection of the unique geologic features.

Acquire lands within the Coffee Lake Creek and Rock Creek areas for regional trail connections.

Tier II Objectives

- Acquire lands to protect unique geologic features within the Basalt Creek area.
- Acquire land for the trail corridor, particularly along Hedges Creek, Basalt Creek and adjacent to Tonquin Road.

About the area

The Tonquin Geologic Area comprises approximately 17 square miles of land in Washington and Clackamas counties. The natural area extends from the communities of Tualatin and Sherwood south to Wilsonville. This area has a unique landscape with extensive evidence of the Bretz Floods (or Missoula Floods) that scoured the Columbia River Gorge and extended into the Willamette Valley multiple times between approximately 13,000 and 15,000 years ago. Receding floodwaters from these events left behind unique geologic formations such as kolk ponds and channels, basalt hummocks and knolls, which are still present throughout the area today. This landscape contains considerable and diverse plant, fish and wildlife habitat. Coffee Lake Creek originates in the Tualatin-Sherwood area and flows south through Wilsonville to the Willamette River. The wetland habitat along the creek supports many important species of migratory and residential wildlife and wetland plants.

The Tonquin Trail is a regional trail envisioned to connect the Tualatin River Wildlife Refuge in Sherwood to the Willamette River and the Willamette River Greenway in Wilsonville. A second "Y" in the northern half of the trail would connect the Tonquin Trail up to the city of Tualatin and join up with the Fanno Creek Greenway. A trail bridge has been constructed across the Tualatin River at this location, linking Tualatin to Tigard and Durham and eventually connecting Portland all the way to Wilsonville. A feasibility study for a trail alignment has been completed by regional and local government partners.

Federal transportation funding will provide for the development of a master plan for the Tonquin Trail beginning in 2007. A section of the trail running through the new "Villebois" neighborhood in Wilsonville will be built by the area's developers. Other landowners or developers in the area could also follow this example.

2006 Natural Areas Program bond description

Bearing visible marks left by the ancient floods that shaped our region, the area from Wilsonville to Sherwood and Tualatin is unique. Protection of the rocky outcrops that frame these former lake bottoms will provide wildlife habitat of considerable complexity and richness and preserve the area's rare geologic features. Within this area, a 12-mile trail corridor will connect nearby cities and the new town center of Villebois to regionally significant natural areas (e.g., Graham Oaks Natural Area, Tualatin River National Wildlife Refuge, Kolk Ponds, the Cedar Creek Greenway in Sherwood and the Willamette River Greenway). The corridor will also provide an important recreation and commuter connector from Wilsonville north to Tualatin.

1995 Natural Areas Program goals and accomplishments

- Create a Tonquin Greenway and wildlife corridor connecting the Tualatin River National Wildlife Refuge in the north to the Willamette River in the south.
- Preserve the remaining unique natural features, such as kolk ponds, in the Tonquin Geological Area, which were created by the Bretz (aka Missoula) floods.
- Acquire the state-owned "Wilsonville Tract" for a future natural area.
- Preserve riparian buffers and wetland areas in the Rock, Coffee and Mill Creek floodplains.

To date 487 acres have been acquired in the Tonquin Geologic Area, including the 250-acre Graham Oaks Natural Area and the 165-acre Coffee Lake Bottomlands, which provide valuable protection and potential corridors for a proposed regional trail through the area.

New focus for Metro's 2006 Natural Areas Program

Protect and preserve the area's rare geologic features, wetlands, ponds and riparian buffers. Secure additional sections of the 12- to 16-mile wildlife and trail corridor connecting the cities of Wilsonville, Sherwood and Tualatin and the Tualatin and Willamette rivers.

Field research and scientific data findings

- The Tonquin Geologic Area supports high quality natural resources that are unique to the region.
- Diverse habitat types (oak woodland, madrone woodland, ash and oak forested wetlands, emergent wetlands, rock outcrops and kolk ponds) exist within close proximity to each other offering excellent opportunities for wildlife and education.
- The wetland habitats along Rock Creek and Coffee Lake Creek support many important species of migratory and residential wildlife and wetland plants.

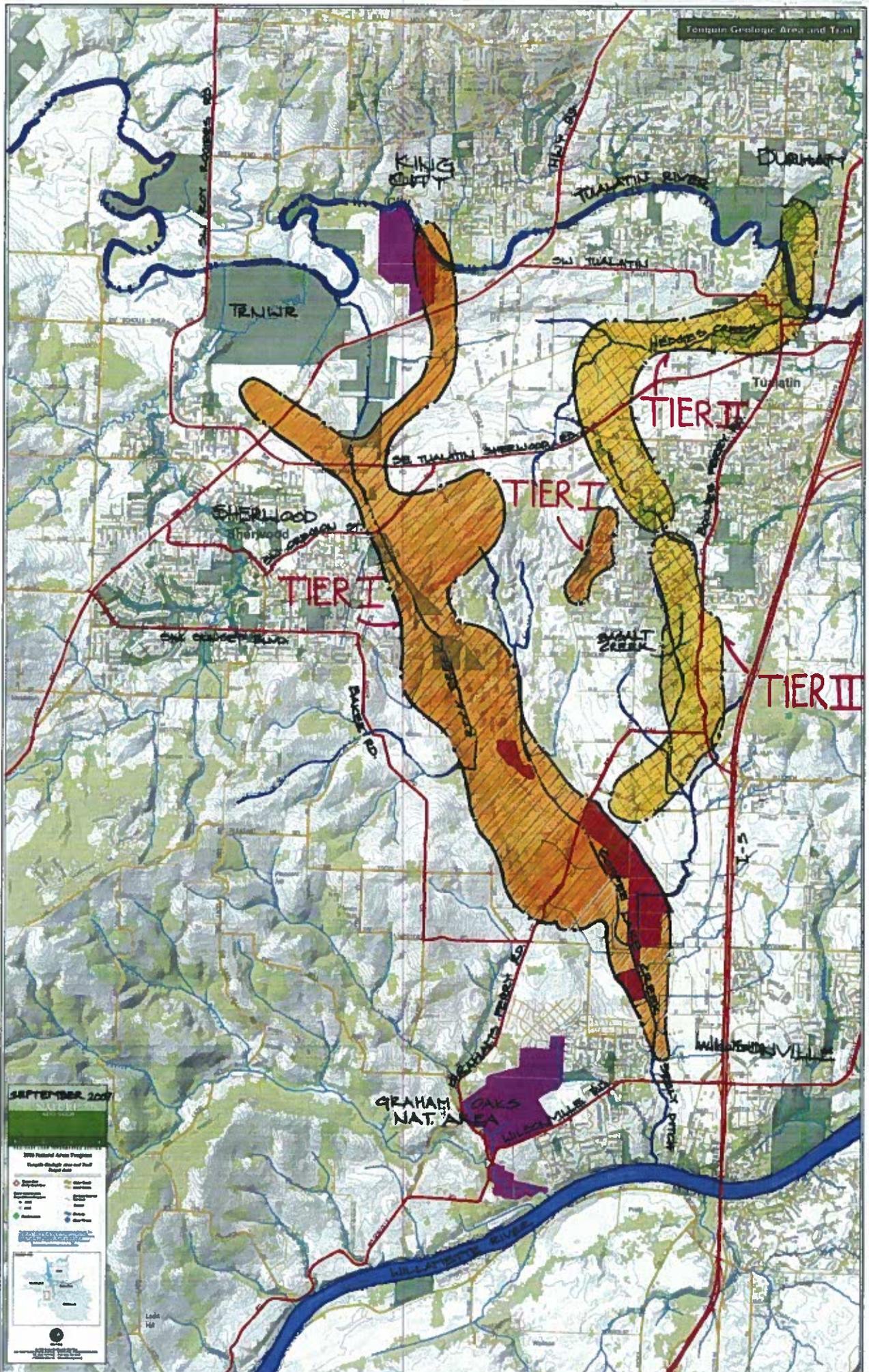
Public input helps Metro Council set priorities

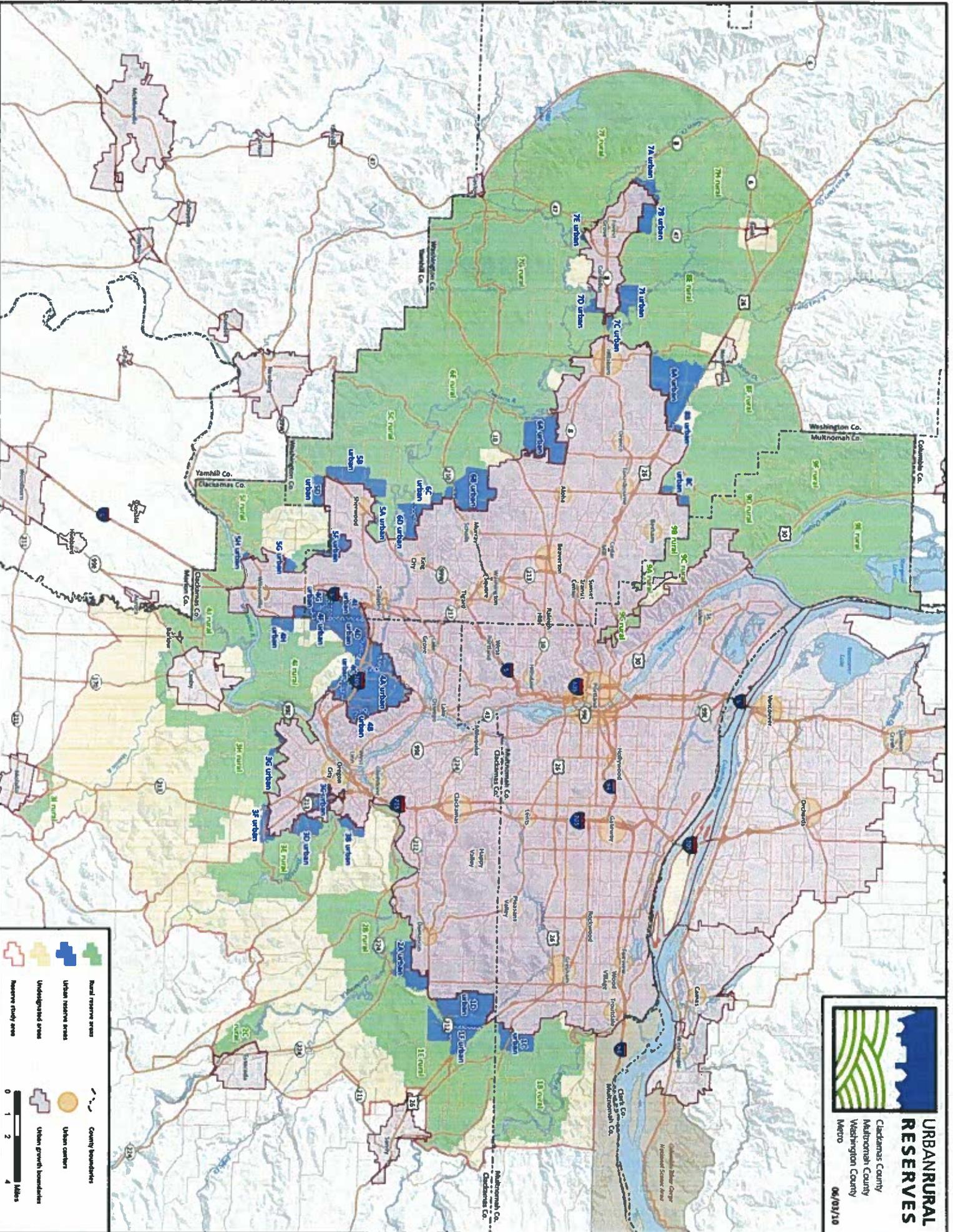
In September 2007 the Metro Council approved acquisition plans for each of the 27 regional target areas. The Metro Council established these priorities with the input of natural resource and land use experts, scientists, citizens and local land managers. More than 500 people attended eight community open houses to share their ideas with Metro Councilors. Nearly 1,000 people filled out questionnaires ranking their priorities and offering ideas for partnerships and other ways to stretch the public's investment. The acquisition plans include a map, goals and objectives for each target area.

NEED ASSISTANCE?

Metro Natural Areas Program, 503-797-1545, naturalareas@oregonmetro.gov.

To stay informed about the natural areas program, get on the natural areas mailing list by calling 503-797-1741 or sending e-mail to metroparks@oregonmetro.gov. For media inquiries, call Karen Kane at 503-797-1942 or Heather Nelson Kent at 503-797-1739.





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