

Department of Land Conservation and Development

Director's Office

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7/11//2019

Pursuant to OAR 660-025-0160(5) herewith are exceptions to the Rejections of Donoghue Objections to Metro Ordinance No. 18-1427 made available on July 1, 2019 from LCDC.

1. I am not indicating a desire for “better natural resource protections than currently exists in Washington County.” I am saying that there is nothing in the Metro (and Beaverton) record that indicates that they seriously involved Washington County in their role as defining and protecting Significant Natural Areas in the county. (Refer to documentation citations in my original objection letter.) There is no indication that they consulted the “Washington County Rural/Natural Resource Plan Element”, or that they talked to the Washington County biologist. The fact that Washington County plan elements may not have been rigorously enforced doesn't imply that they should be ignored.
2. Goal 5 (OAR 660-015) says that “Local governments shall adopt programs that will protect natural resources and conserve scenic, historic and open space resources for present and future generations. ... “The following resources **shall be inventoried**: “ (Which I then enumerated in my original objection.) Are you saying that “local government” that should inventory them is Metro/Beaverton? Then it has not been done. If you are saying that it should be inventoried by Washington County, then have they been involved in the UGB expansion process to acquire their inventory?
3. You refer to the Metro's analysis of environmental impacts in “the record at 2111”. (heading Environmental). That sections discusses numerous stream corridors, mainly in the western part of the reserve south (downstream) of the Cooper Mountain Nature Park. “The overwhelming majority of these streams are within forested riparian corridors and numerous portions of streams have slopes greater than 25% adjacent to the stream corridor. As you would expect there is a significant amount of riparian and upland habitat identified throughout this network of streams.” There are also over 28000 square feet of National Wetland Inventory wetlands identified. This section of the document also indicates that any east-west connections would need to cross numerous streams and impact a large segment of the habitat area, “the cost of which

may be prohibit such road connections.”

Given this the last few sentences of this section still state that “urbanization of the reserve can occur with minimal impacts to these stream corridors and habitat areas, especially if east-west road connections are not made through this location.” It goes on to say that if east-west connections are developed then there would be significant impacts on stream corridors and habitat areas ....and ... “urbanization of the area could occur with **minimal** to moderate or high impacts ...” Minimal, really?

In other words, although the resources and risks are significant there is no mandate in how developers should protect them.

This less-than-page environmental analysis at 2111 of the record assumes that riparian areas, stream flows and perhaps habitat are the only environment/resource elements. There is no talk of wildlife corridors, groundwater resources, natural hydrologic flows, etc. There is no indication that biologists (like the Washington County biologist) and other scientist were involved in studying the area. The assumption appeared to be that each riparian area could be sealed up and protected in its own little band of land.

4. Metro’s analysis of local roadway transportation resources (2108 ff. in the record) appears to be based upon 2015 pm volume/capacity studies. And they appear to be focused on existing arterials that are close to (Scholls Ferry Road) or across (175<sup>th</sup> Ave.) Cooper Mountain, as well as collectors on Cooper Mountain. There does not appear to be any future projections of what the new traffic flows will be coming from the South Cooper Mountain, River Terrace and other new developments to the south, or of the South Hillsboro development to the west. These are on the order of 10’s of thousands of homes being developed in the near term. Many of the residents to the south will try to commute around or over the mountain to jobs in Beaverton or Hillsboro. Even without apparently including these new traffic sources the Metro analysis states that “175<sup>th</sup> Ave would see additional traffic as would SW 170<sup>th</sup> Ave, SW 185<sup>th</sup> Ave, SW Gassner Road and SW Grabhorn Road which could lead to future congestion issues on SW Farmington Road” .... Murray Blvd .... SW Roy Rogers Road ... etc. None of the costs indicated in the analysis (2110 in the record) are designated for these other arterials.

Furthermore, the analysis indicates at there are no Tri-met resources on top of the mountain, and there are minimal pedestrian resources. I found it humorous that bike lanes were being discussed for Weir Road and 175<sup>th</sup> Road. Anyone who rides a bike on these roads over the mountain does not do it to commute. It is quite steep. I used to

ride up these roads on the weekend when I was younger as a gut busting aerobic exercise ... until my knees gave out.

Finally, in that Washington County and the state are mainly responsible for the arterial roads, I found no indication that Washington County and the state were involved in the analysis or in the determination of costs and timelines for any arterial remediation or additions.

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Cooper Mountain

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