



Marion County
OREGON

Board of Commissioners

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July 11, 2019

**BOARD OF
COMMISSIONERS**

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**CHIEF
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OFFICER**

Jan Fritz

ATTN: Director Jim Rue
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Re: Metro 2018 UGB Growth Management Decision – Marion County Objection

Dear Director Rue and LCDC Commissioners:

Marion County is in receipt of department's July 1, 2019 Report, and is concerned with the department's recommendation that our objection to the Metro 2018 UGB decision be rejected. While the statewide land use process does not provide a means to coordinate across county lines, the impacts of Metro's growth on Marion County's water resources and transportation network are too important to remain unaddressed.

Marion County is concerned that metro's plans for urbanization rely on drawing water from the Willamette River System. The potential for reduced annual water in the Cascade Range is not addressed. The United State Army Corps of Engineers (USACE) proposal to reallocate water storage and free-flow river water resources in the Willamette River System in a manner to supersede the existing system of water rights is not analyzed or addressed. With existing demands on the Willamette River's water supply, it is increasingly unlikely that Metro cities will be able to guarantee a reliable water supply.

Metro's plans for urbanization rely on drawing water from the Willamette River System. This will likely cause several small cities in Marion County to lose the ability to exercise their water rights with significant local effects. In addition, many farms within Marion County rely on water for irrigation. Marion County is the largest producing agricultural county in the state of Oregon, with 800 agricultural firms employing over 16,000 people and a payroll of nearly \$550 million dollars.

Marion County's economy relies heavily on water in the North Santiam Watershed, which is part of the Willamette River System. In total, a report prepared by EcoNorthwest and titled "Importance of Water in the North Santiam Basin" (Exhibit A) concludes that the economic value of water in the North Santiam Watershed exceeds \$180 million per year, including \$36.5 million from recreation and \$59.8 million from irrigation-related agriculture. Based on those figures, and the fact that more than half of the North Santiam Watershed is in Marion County, and more than one-third of the County is in the North

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Santiam Watershed, the County estimates that low water conditions could result in an economic loss of \$11 million per year to local businesses and industries just for recreation purposes. This is a loss that the County cannot afford and that would negatively impact many of our local communities.

Metro traffic impacts, especially in northern Marion County, are significant. While additional housing in Metro may reduce the need for housing elsewhere, there is, and will remain, a significant number of travelers every day between Marion County and the Metro area. The impact of this traffic must be addressed in this process. Actions taken on the roadway network in Metro alters the demand for different highways and roadways in the Metro area that then changes traffic patterns in Marion County. The outcome of these impacts of Metro on Marion County roadways, and the decisions that Metro makes to improve and change its own roadways have a significant effect on Marion County traffic and quality of life which must be addressed before the Metro 2018 UGB decision proceeds.

The I-5 Boone Bridge which traverses the Willamette River between Portland and Salem sees daily heavy traffic congestion many hours of the day, which will only continue to worsen with the proposed UGB plan. Currently the I-5 Boone Bridge is inadequate for the 130,000 vehicles that cross it daily; it does not have the capacity for the growth planned in the proposed UGB expansion. Increases in population have caused traffic back-ups that can extend up to ten miles in either direction of the Boone Bridge and forces commuters to plan for extra time when traveling along I-5. An I-5 Wilsonville Facility Plan has been adopted by ODOT in 2018, however, it only addresses the SB bottleneck through Wilsonville to the Canby exit and does not discuss the effects to the transportation network outside of the southbound I-5 corridor; nor does it evaluate or make recommendations for the northbound corridor.

In our previous letter we identified several possible remedies. The statewide land use process provides a means to coordinate the concerns of all affected local jurisdictions within a county and consider these remedies. However, that coordination responsibility does not extend across county lines or between different jurisdictions. Regardless, the impacts of the proposed UGB expansion are a real and significant concern to Marion County. For that reason, we support entering into alternative dispute resolution as recommended in DLCD's report and ask that the Metro 2018 UGB decision not become final until after an alternative dispute resolution process has occurred. Marion County may seek legal alternatives if the needs of local communities are not satisfied either through alternative means or by department action.

Sincerely,


Kevin Cameron, Chair


Sam Brentano, Vice Chair


Colm Willis, Commissioner

Attached: Importance of Water in the North Santiam Basin – Exhibit A