

1/27/2019

I participated in the Metro UGB amendment process in reference to Metro Resolution No 18-2914 / Ordinance No. 18-1427 by giving public testimony on 9/27/2018, and by providing written documentation at the same time (attached.) What follows here are my objections to the adoption of the ordinance. My objections center on the expansion of the UGB into the Urban Reserve on mid-Cooper Mountain and the City of Beaverton's planning to place 3700+ homes in this area of Washington County.

While my testimony and documentation enumerated four areas of concern, I will focus on two of them here, Natural Resources (or Natural Areas) protection and transportation challenges in the area. There is something common to both. There seems to be a mismatch between Metro/Beaverton and Washington County when it comes to the roles and responsibilities related to Natural Resource protection and transportation needs:

- 1) While Metro and Beaverton address them somewhat in their UGB expansion documentation, the major designation of Significant Natural Areas (SNA or SNRA) and Wildlife Habitat is done by Washington County.
- 2) While Metro and Beaverton address local transportation in or near areas being considered for UGB expansion, they are not integrating the bigger picture issues of the transportation flow within the county among existing and new housing developments. That is expected to be the role of the county, and perhaps the state.

Washington County's role and involvement in this Metro UGB expansion process was not very well integrated, if at all.

Natural Resources

Washington County defines Significant Natural Areas (SNA) and Wildlife Areas throughout the county including on Cooper Mountain. Along with these designations comes constraints to be considered when developing these areas. These constraints are spelled out in the "Washington County Rural/Natural Resource Plan Element", Policy 10 (Fish and Wildlife Habitat) and Policy 11 (Significant Natural Areas). The document can be accessed via the following URL:

https://www.co.washington.or.us/LUT/Divisions/LongRangePlanning/upload/RuralResourcePlan_2016_112516.pdf

The subheading for Policy 11 is "It is the policy of Washington County to protect and enhance Significant Natural Areas." Among some of the listed points of this policy are:

c.) Encourage property owners with lands that qualify as open space to apply for assessment under this category if the proposed use of the land meets the standards specified by ORS 308-740-790, including to "preserve or enhance natural or scenic resource."

d.) Review development proposed in Significant Natural Areas to reduce its impact on the Area's unique or fragile character or features.

e.) Limit development and the alteration of natural vegetation in riparian zones and in locations identified as significant water areas and wetlands. Since these areas overlap with several significant natural areas, the regulations should serve to protect significant natural areas from degradation.

The Metro Ordinance Ordinance No. 18-1427 document for the current UGB expansion does not seem to take this into consideration. In Exhibit F to Ordinance No. 18-1427, paragraph F. Statewide Planning Goals, there is only one sentence relating to state Goal 5:

“Goal 5 (Natural Resources): The Metro Council finds that adoption of Ordinance No. 18-1427 does not impact any inventoried Goal 5 resources and is therefore consistent with Goal 5 and its implementing rules.”

That’s it. There is no included document to show that there are no Goal 5 resources. They don’t detail what they consider the inventoried Goal 5 resources particularly in the Urban Reserve on mid-Cooper Mountain. There is nothing to indicate that they involved the Washington County biologist in their analysis.

The state specification of Goal 5 resources (OAR 660-015-0000(5)) says that the following resources shall be inventoried:

- a. Riparian corridors, including water and riparian areas and fish habitat;
- b. Wetlands;
- c. Wildlife Habitat;
- ...
- f. Groundwater Resources
- ...
- h. Natural Areas
- ...

A good portion of the Rural Reserve on mid-Cooper Mountain includes these types of resources. The “headwaters” of McKiernan Creek (flowing to the Tualatin River) begin just to the S and SW of the Cooper Mountain Nature park. The area has several riparian areas, tall tree canopy and an amazing amount of wildlife. Included with the Cooper Mountain Nature Park it has significant wildlife corridors.

What did not happen in South Cooper Mountain

The South Cooper Mountain (SCM) Concept Plan (December 2014) stated that there were some key habitats on Cooper Mountain (including just north of the projected SCM development) that provide wildlife for the Metro Cooper Mountain Nature Park and water management that inhibits erosion that would compromise the homes downhill in SCM. Quoting from the document, “A basic premise of the scenarios and of this planning effort is that the natural resources within the planning area are among the most important amenities and should be protected and enhanced as much as possible”

Yet trees continue to get removed in SCM developments. Notification was recently given with the Vineyards application (a development in the north part of SCM) of plans for tree removal to make way for the development. Since much of the undeveloped areas on Cooper Mountain have 12-20 degree grades, or are in designated landslide sectors, or have ponds, streams or other high-water tables, it just does not make sense to take an aggressive approach to urbanization of

Reserves on Cooper Mountain. Heavy development of this area would seem to preclude LID (Low-Impact Development) principles that strive to mimic “predisturbance” hydrologic processes.

What happened in 2003 in a North Cooper Mountain SNA: A Cautionary Tale

On the north slope of Cooper Mountain, Fallatin Homeowners Association (FHA) and a neighboring homeowners association own and maintain a 12+ acre “green space” of old growth trees. The green space shelters parts of Beaverton’s Johnson Creek whose headwaters start on the north side of Cooper Mountain not too far from the Cooper Mountain Nature Park. This green space was shown on county resource maps to be part of a larger Significant Natural Area.

In 2003, when I was president of the FHA, plans were made public for the New Renaissance Point II development just to the north of the green space. The plans showed that the development encroached on a fair amount of the SNA. FHA and several other neighbors actively protested this encroachment at the Washington County hearings on the development, but after a couple of rounds of hearings the hearing officer essentially stated what he couldn’t really stop the development. All he could do was widen the defined riparian areas a little, but otherwise the development could proceed as planned.

Today if you look at the Washington County resources maps for the Aloha-Reedville-North Cooper Mountain area, that area near our green space that used to be designated as an SNA no longer has that designation. Despite the county’s designation of the area as an SNA that needed extra protection, the actual development of the area, not a county decision, erased the SNA from the map.

Transportation

Even before all the new development in this area began residents of Cooper Mountain have been noticing an increase in traffic on our steep streets and roads. In particular, traffic is becoming heavier on the snow-zone designated 175th Avenue, the only North-South arterial crossing the 792-foot mountain. The road is a major route for commuters in Tigard, Sherwood, Tualatin, etc. connecting them to jobs in Beaverton and Hillsboro (e.g. Intel, Nike, etc.)

The new development of about 6000 homes along Scholls Ferry Road and 175th (South Cooper Mountain, River Terrace, etc.), and the new development of about 9000 homes in South Hillsboro within a few miles of Cooper Mountain, lead us to think our future will include increasing gridlock. It does not appear that the impact of all these new developments is being evaluated in relation to Washington County’s planning and funding for future transportation needs. We fear that all this heavy new development is vastly outpacing the funding and timing of new or improved roads or other transit solutions.

And now with Metro’s Ordinance No. 18-1427 for UGB expansion and the City of Beaverton’s plans to build 3760 homes in the Urban Reserve we are even more concerned. The documentation supporting the ordinance and planning appears to give just a small nod to the

transportation impacts of the new development outside of the planning area. Regional transportation needs and integration of the new UGB into existing and pending housing developments and regional transportation systems is hardly considered.

Conclusion

Maybe it is not Metro's role in writing ordinances to mandate protection of Significant Natural Areas, Wildlife Habitat and wetlands in coordination with Washington County policies. Or perhaps it is not their role to require that UGB expansion be done in close coordination with county transportation futures studies and funding. But if not, how does this get done so that development doesn't outstrip the ability of the county to manage its natural resources and transportation needs?

I and many others think that Beaverton's Concept Plan proposes to do too much, too fast – at the possible expense of the current and future residents' quality of life. Without knowing what transportation problems will stem from the 15000+ homes currently under construction in the area, it wants to add 3760 more within 10 years. And it may sacrifice essential natural resources in the Rural Reserve that provide amazing wildlife habitat and natural water management: despite the vision to value and protect natural resources in the 2014 South Cooper Mountain concept plan, plenty of exceptions have already been made to alter current hydrologic processes and remove old trees. Would this be the pattern for the Rural Reserve in the future?

We hope the Beaverton City planners take this mid-Cooper Mountain development slower and reduce their targets to allow the transportation infrastructure to catch up with the high Growth Communities already in progress around us. We feel that a slower, less aggressive plan would lead to better managed growth, better preserved natural resources and the best solution for the public good.

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Comments to Metro on Beaverton UGB Expansion – Resolution 18-4914

9/27/2018

Council president and members of the council, for the record my name is Michael Donoghue and I am a member of the 175th Neighborhood Association on Cooper Mountain. I speak in qualified opposition to the City of Beaverton's plan to expand the Urban Growth Boundary into the Urban Reserve on mid-Cooper Mountain in order to build 3700 houses there.

Traffic and Transportation

The 175th Neighborhood Association is a grass roots group started in an effort to improve traffic safety for the residents of the 400 homes which have no other access to the outside world other than 175th Avenue. This road is critical to existing and future residents' quality of life, but it is also the major North-South arterial across the mountain. It is also designated as a snow zone requiring traction devices from Scholls Ferry Road to Rigert Road.

While our group was dealing with increasing traffic density issues before the advent of the South Cooper Mountain (SCM) development, the building of thousands of new homes from Oldham Meadows to SCM to River Terrace in Tigard to Sherwood has us greatly concerned. We expect (and are already seeing) an increasing volume of traffic across the mountain, probably with work destinations in Beaverton and Hillsboro. Washington County LUT has been doing a great job working on incremental changes to 175th which makes sense, but as we all know that the real solution is to invest in diverting traffic to a safe all-weather route Around Cooper Mountain. But adding 3700 new homes on the mid-Cooper Mountain Urban Reserve does nothing to divert traffic from 175th (or 185th or Grabhorn Road.)

I personally have no dog in this fight: I live on the north side of Cooper Mountain and I own no property in the Urban Reserve Area. But my neighbors and I are acutely aware of the increased traffic coming across the mountain. We are also aware of the increasing volumes of traffic on the "destination" arteries for this traffic on the north side of the mountain, - Farmington Road, TV Highway, US26, etc. And we haven't even mentioned all the traffic that will be generated from the thousands of homes in the new South Hillsboro development. We fear that all this heavy new development is vastly outpacing the funding and timing of new or improved roads.

Local Opposition

We have recently collected signatures of 263 residents in the Cooper Mountain Urban Reserve area who are in opposition Beaverton's expansion proposal in its current state. There are 61 households who are unwilling sellers, and this already represents 135 acres of the 600 acres in

the Beaverton Concept Plan's "buildable area". There are at least 10-15 homes with 5+ acre parcels which are in gated communities with swimming pools and tennis courts whom we have not contacted. Clearly these residents relish their seclusion and are not probably not ready to sell.

Natural Resources

The mid-Cooper Mountain Urban Reserve area is a significant natural resource. It has a number of riparian areas and an amazing amount of wildlife. Included with the Cooper Mountain Nature Park it has significant wildlife corridors. Many parts were designated as county Significant Natural Areas (SNA).

According to pages 52-55 of the South Cooper Mountain (SCM) Concept Plan, published in December 2014, there are some key habitats on Cooper Mountain which provide wildlife for the Metro Cooper Mountain Nature Park and also water management, so erosion does not compromise the homes downhill in SCM. Quoting from the document, "A basic premise of the scenarios and of this planning effort is that the natural resources within the planning area are among the most important amenities and should be protected and enhanced as much as possible"

Yet trees continue to get removed in SCM developments. Notification was recently given with the Vineyards application (a development in the north part of SCM) of plan for tree removal to make way for the development. Since much of the undeveloped areas on Cooper Mountain have 12-20 degree grades, or are in designated landslide sectors, or have ponds, streams or other high water tables, it just does not make sense to take an aggressive approach to urbanization of Reserves on Cooper Mountain. Heavy development of this area would seem to preclude LID (Low-Impact Development) principles that strive to mimic "predisturbance" hydrologic processes.

Affordable Housing

Metro needs to identify growth opportunities including affordable housing for healthy economic growth. We do not dispute this at all. And we do not doubt Beaverton's good intentions in wanting to build affordable housing. But is mid-Cooper Mountain an appropriate and feasible location for affordable housing? The new SCM houses are now being priced beginning at \$600,000. At the Kemmer Ridge development just north of the Urban Reserve Area, houses start at \$550,000. There are no public facilities on Cooper Mountain, no public transportation and no affordable shopping within walking distance.

Our Conclusion, Our Hope

The 175th Neighborhood's consensus is that Beaverton's Concept Plan proposes to do too much, too fast – at the expense of the current and future residents' quality of life. And it sacrifices essential natural resources that provide amazing wildlife habitat and natural water management

Most of us believe that the Urban Growth Boundary concept is a good one. It has done Oregon a great service. But in this case, we feel that the planners need to take this slower and reduce their targets to allow the transportation infrastructure to catch up with the High Growth Communities already in progress to the south of us. We feel that a slower, less aggressive plan would be better managed growth and be the best solution for the public good. We would be happy to partner with the City of Beaverton to revisit their plans to identify a significantly reduced plan for the area that can be implemented at an appropriate time.

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From: [Michael J. Donoghue](#)
To: [DLCD PR-UGB](#)
Subject: Objections to Metro Ordinance No. 18-1427
Date: Thursday, January 31, 2019 9:43:31 AM
Attachments: [Objections to OR State about Metro Ordinance No 18-1427.docx](#)
[Comments to Metro on UGB Expansion in Mid Cooper Mountain.docx](#)

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Attached are my objections related to Metro's ordinance No. 18-1427 in December 2018. Also attached is the document corresponding to my testimony at a Metro public meeting on the subject on 9/27/2018.